



July 28, 2026

Mr. Umair Hassan, Project Manager/Environmental Permit Specialist
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Commission on Environmental Quality
12100 Park 35 Circle
Building F, MC 130
Austin, Texas 78753

RE: Final NOD Response Documents
Safety-Kleen Systems, Inc. – Pasadena, Harris County, Texas
Hazardous Waste Permit No. 50260
Industrial Solid Waste Registration No. 71143

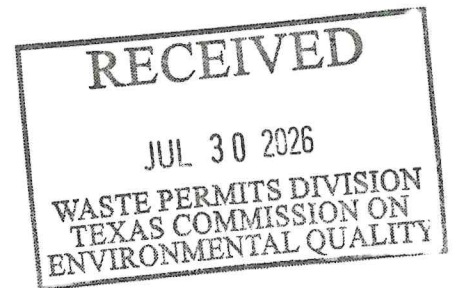
Dear Mr. Hassan:

Safety-Kleen Systems, Inc. (Safety-Kleen) has enclosed the responses to Notice of Deficiency (NOD) 1, NOD 2 and the revised pages of Appendix IX for inclusion into the permit renewal application that was received by TCEQ on January 30, 2026. A Part B Signature page has also been enclosed.

If you have any questions, please don't hesitate to contact Ricardo Saucedo at (210) 241-2619 or at ricardo.saucedo@cleanharbors.com or myself at (308) 241-0889 or at zebre.jessica@cleanharbors.com.

Sincerely,

Jessica Zebre
Vice President Environmental Compliance
Safety-Kleen Systems, Inc.





Replacement Part B Signature Page

Signature Page

I, Ricardo Saucedo, Sr. Environmental Compliance Mgr,
(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: [Signature] Date: 7/24/2026

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

I, N/A, hereby designate N/A
[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.

N/A

Printed or Typed Name of Operator or Principal Executive Officer

N/A

Signature

SUBSCRIBED AND SWORN to before me by the said Sr. Environmental compliance mgr

On this 24th day of July, 2026

My commission expires on the 2nd day of March, 2030

Notary Public in and for Bexar County, Texas

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

[Signature]



Application Deficiencies – Technical NOD 1 - Compliance Plan

ID ¹	App. Part	App. Section	Location ²	Citation	Error Type ³	Safety-Kleen Deficiency Description/Resolution
CP1	B	XI	XI.A and XI.DCP Tables VII, VIII, and IX	30 TAC §335.166, §305.45(a)(8)(C), §350.4(a)(40) and §335.1(190)	Inconsistent/Omitted	Safety-Kleen has updated and provided all nine CP tables into the forms provided by TCEQ. CP Table IX was also provided, which was not previously submitted in the renewal application dated February 26, 2026. All nine CP tables should replace the original CP Tables from the February 2026 submittal as Appendix XI.
CP2	B	XI	XI.A.3	30 TAC §305.50	Incomplete	Section XI.A.3 has been updated to provide the history of the facility and the <i>“Historic Spillage Area”</i> . For reference, Historic Spillage Area is SWMU No.5.
CP3	B	XI.A	XI.A.4.g, XI.A.4.h, and XI.A.4.j	40 CFR 270.14(c) and 30 TAC §350.51	Omitted/Inconsistent	Safety-Kleen has provided the following information within Attachment B: • Current contaminant plume maps; • Cross-sections; and • Well construction diagram A well construction diagram could not be located for AW-1, but is assumed to be similar in kind to AW-2.

¹ Deficiency ID – Key: A#=Administrative deficiency (ex. A12); T#=Technical deficiency relating to Sections I-X and Sections XII-XIII of the Part B application (ex. T10); C#=Comment only (ex. C1); CP#=Technical deficiency relating to Section XI-Compliance Plan of the Part B application (ex. CP14); Number in parenthesis (n) = nth instance of same deficiency (ex. T1(2) is the second instance of deficiency T1 originally identified in previous NOD).

² Location of deficiency in submittal/application. Items in square brackets [] refer to applicant’s supplemental information submitted as attachments to the application form.

³ Possible Error Types: Ambiguous, Incomplete, Inconsistent, Incorrect, Omitted, Typo, or Format.

ID ¹	App. Part	App. Section	Location ²	Citation	Error Type ³	Safety-Kleen Deficiency Description/Resolution
CP4	B	XI.A and XI.D	Table XI.A.1. and CP Table VI	30 TAC §335.162 and §335.166	Incorrect	NOR Unit 001-004 were closed in September 1999, NOR Units 005 was closed in November of 2009. NOR Units 006-007 are associated with recovery system that is no longer active. The Historic Spillage Area is associated with NOR Unit 005. CP Table VI, CP Table I or Table XI.A.1. have been updated to be consistent. The waste management history of the Historic Spillage Area (also called AA Area as referenced in the SAP) and Table XI.A.1. and CP Table VI have been updated.
CP5	B	XI.D	XI.D.2.a(5)-(6)	30 TAC §335.166	Omitted	The historic and current type of corrective action system implemented for the Historic Spillage Area has been provided. The description of how recovered/purged affected groundwater is stored, treated and disposed of is also provided.
CP6	B	XI.D	XI.D.3. CP Table V, and CP Attachment A figures	30 TAC §335.166	Incomplete/Omitted	Safety-Kleen has clarified the type of monitoring wells that are included in facility groundwater monitoring well network. Secondly, Safety-Kleen revised CP Table V and CP Attachment A figures to clearly identify the network monitor wells. These wells include 4 POC wells, 1 background well, 4 point of exposure (POE) wells, and 4 Corrective Action Observation wells (i.e., "Supplemental wells").
CP7	B	XI.B and XI.D.3.a(4)	CP Table III	30 TAC §335.151 and §335.166	Incorrect	Safety-Kleen has revised CP Table III to correct that the ^{GW}GW_{ing} protective concentration level for Chloroform is 0.08 mg/l based on the 2025 Tier 1 protective concentration level tables.

ID ¹	App. Part	App. Section	Location ²	Citation	Error Type ³	Safety-Kleen Deficiency Description/Resolution
CPT8	B	XI.B and XI.D.3.a(4)	CP Table IIIA	30 TAC §335.151 and §335.166	Ambiguous/ Omitted	Safety-Kleen has clarified how the groundwater “indicator parameters” were selected for CP Table IIIA, which will be monitored on a semi-annual basis as part of the RCRA Corrective Action Program for the “ <i>Historic Spillage Area</i> ”.
CP9	B	XI.E	Table XI.E	30 TAC §335.156 and §335.179	Incomplete	Safety-Kleen has completed and provided table XI.E.
CP10	B	XI.E	Tables XI.E.2 and XI.E.3	30 TAC §335.156 and §335.179	Inconsistent	Safety-Kleen has revised the cost estimate tables based on the response to comment CP6.

ID ¹	App. Part	App. Section	Location ²	Citation	Error Type ³	Safety-Kleen Deficiency Description/Resolution
CP11	B	CP Attachment C	Sampling and Analysis Plan (SAP)	30 TAC §335.163 and §335.165	Omitted / Incorrect/Inconsistent	Safety-Kleen has made the following edits to the SAP and provided in CP Attachment C: a) SAP Section 1.0 has been edited to replace Area AA language to be the “<i>Historic Spillage Area</i>” identified as the release area in Table XI.A.1, CP Tables I, II, III, IIIA, V, and VI. b) Figure 1 has been provided that depicts the location of the release area and groundwater monitoring well locations. c) SAP Section 3.1 has been revised to include gauging each monitoring well for the presence/absence of light and dense non-aqueous phase liquids prior to purging the monitoring well as specified in the Permit application instructions. d) SAP Section 3.3 has been revised to describe that purged water will be transported to an approved off-site facility for treatment and/or disposal. e) SAP Tables 1 and 2 to have been revised to include the correct hazardous constituents listed in CP Table III and indicator parameters listed in CP Table IIIA; and f) Table 2 has been revised to use the most recently published version of each laboratory analytical method to analyze the groundwater samples (e.g., use Method 8260D for VOCs, not 8260B).

Response to Application Deficiencies – Technical NOD 2 - Compliance Plan

ID ¹	App.	App. Section	Location ²	Citation	Error Type ³	Safety-Kleen Deficiency Resolution Summary
CP1-2	B	XI	CP VIII	30 TAC §335.166,	Incomplete	Safety-Kleen has submitted a revised CP Table VIII. It has been filled out in all the applicable spaces in the second-left hand column of CP Table. Also, note 2 at the bottom of the table was deleted.
CP4-2	B	XI.A and XI.D	Table XI.A.1. and CP Table VI	30 TAC §335.162 and §335.166	Incorrect	Safety-Kleen has provided updated Table XI.A.1 that lists all the NOR Units and their current status: • NOR Unit 001-004 were closed in September 1999, • NOR Units 005 was closed in November of 2009. The Historic Spillage Area is associated with NOR Unit 005 • NOR Units 006-007 are associated with recovery system that is no longer active. Also, CP Table VI has been revised to include the dates for the end of the compliance period, beginning and end of post-closure care for the Historic Spill Area.
CP7-2	B	XI.B and XI.D.3.a(4)	CP Tables III and IIIA	30 TAC §335.151 and §335.166	Incomplete	Safety-Kleen has revised both CP Tables III and IIIA to include the groundwater protection standard (GWPS) in Column C for each chemical of concern (COC) that is applied at the point-of-exposure (POE) wells that are listed in CP Table V. The GWPS is based on the residential ^{GW} GW _{ing} protective concentration level for all COCs at the POE.

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² Location of deficiency in submittal/application. Items in square brackets [] refer to applicant's supplemental information submitted as attachments to the application form.

³ Possible Error Types: Ambiguous, Incomplete, Inconsistent, Incorrect, Omitted, Typo, or Format.



Replacement Appendix XI

Appendix XI Compliance Plan

List of Appendices	
Appendix XI.A.1	Table XI.A.1 – Facility History for Waste Management Units
Appendix XI.E.1	Table XI.E.1 – Corrective Action Program Cost Estimate
Appendix XI.E.2.e	Table XI.E.2.e – Groundwater Monitoring Cost Estimate
Appendix XI.E.3	Table XI.E.3 – Financial Assurance Summary
CP Table I	CP Table I: Waste Management Units and Areas Subject to Groundwater Corrective Action and Compliance Monitoring
CP Table II	CP Table II: Solid Waste Management Units and/or Areas of Concern Addressed in Permit Section XI.H. for which Corrective Action Applies Pursuant to 30 TAC Section 335.167
CP Table III	CP Table III: Corrective Action Program Table of Detected Hazardous and Solid Waste Constituents and the Groundwater Protection Standard
CP Table IIIA	CP Table IIIA: Corrective Action Program Table of Indicator Parameters and the Groundwater Protection Standard
CP Table IV	CP Table IV: Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Quantitation Limits RESERVED
CP Table IVA	CP Table IVA: Compliance Monitoring Program Table of Detected Hazardous Constituents and Groundwater Protection Standard RESERVED
CP Table V	CP Table V: Designation of Wells
CP Table VI	CP Table VI: Compliance Period for RCRA-Regulated Units
CP Table VII	CP Table VII: Reporting Requirements
CP Table VIII	CP Table VIII: Compliance Schedule
CP Table IX	CP Table IX: Description of Uppermost Aquifer
CP Attachment A	Sheet 1 of 3 Site Facility Map
	Sheet 2 of 3 SWMU Location Map
	Sheet 3 of 3 Well Location Map
CP Attachment B	Site Geology, Hydrogeologic Conditions, and Relationship to Surface Water
CP Attachment C	Attachment C – Sampling and Analysis Plan

Appendix XI Compliance Plan Part B Application

A. Site Specific Information

1. General Site Information (provide the following information):
 - a. An overall plan view map of the entire facility delineating the facility's property boundary, Facility Operations Area (FOA) boundaries, as applicable, and the plume management zone (PMZ) boundaries as applicable;

Not Applicable

All CP Attachment A Maps should be provided in Appendix XI of the application.

- b. A 7.5 minute U.S.G.S. quadrangle topographic map showing the entire facility;
NOTE: This information is supplemental only and is not intended to be included as figures in the final draft permit.

Not Applicable

- c. All oversized (larger than 8.5" by 11") drawings submitted in accordance with A, above, should be accompanied with legible photocopies of the reduced drawing on 8.5" by 11" sheet(s) of paper which shall be used as "CP Attachment A" maps in the final draft Permit/Compliance Plan. The applicant should title the map(s) accordingly as "CP Attachment A, Sheet 1 of xx - Facility Site Map"; "CP Attachment A, Sheet xx of xx FOA Lateral Boundary Map"; "CP Attachment A, Sheet xx of xx, PMZ Boundary Location Map"; and

See CP Attachment A Sheets 1 to 3

- d. Aerial photographs through time depicting changes in the land use, if available.
NOTE: This information is supplemental only and is not intended to be included as figures in the final draft permit

2. Waste Management
Provide a complete list and a plan view drawing(s) locating and identifying the following waste management units at the scale of 2.5 centimeters (1 inch) equal to not more than 61.0 meters (200 feet). All oversized (larger than 8.5" by 11") drawings should be accompanied with legible photocopies of the reduced drawing on 8.5" by 11" sheet(s) of paper. Please provide information for each waste management unit listed

below on CP Table XI.A.I. - Facility History for Waste Management Units.

All CP Attachment A Maps should be provided in Appendix XI of the application.

- a. All hazardous waste management units regulated under the Industrial Solid Waste and Municipal Hazardous Waste Rules (Chapter 335) required to be monitored in accordance with 30 TAC 335.164 (Detection Monitoring), 335.165 (Compliance Monitoring Program) and 335.166 (Corrective Action Program);

Not Applicable

- b. All solid waste management units (SWMUs) and Areas of Concern (AOCs) regulated under 335.167 which are recommended for further investigation and/or corrective action in the RCRA Facility Assessment (RFA) shall include those identified in accordance with the permit requirements subsequent to the initial RFA

Not Applicable

- c. All on site wastewater treatment units.

Not Applicable

3. Facility History

Based on the information provided in CP Table XI.A.I., complete CP Table I - Waste Management Units and Areas Subject to Groundwater Corrective Action and Compliance Monitoring accordingly in the format provided.

For the SWMUs or AOCs listed in CP Table XI.A.I. regulated under 30 TAC 335.167 which are recommended for further investigation and/ or corrective action in the RCRA Facility Assessment (RFA), including those identified in accordance with permit requirements subsequent to the initial RFA, complete CP Table II - Solid Waste Management Units and Areas of Concern for which Corrective Action applies pursuant to 30 TAC 335.167. CP Table II will become part of the Compliance Plan.

Operations began at the facility in May 1979. The SK-Pasadena facility served as a distribution center for Safety-Kleen products and as a consolidation center for incoming waste and recyclable materials.

Impacts to groundwater were discovered during a spill assessment in June 1993. The impacts are due to incidental spillage while unloading waste liquids. A recovery system was installed in 1994 to remediate the groundwater. The groundwater action is being conducted under Compliance Plan CP-50260-001 issued August 1, 1997.

In November 1993, a RCRA Hazardous Waste Permit was issued for the facility authorizing the operation of units for storage and processing industrial and hazardous waste. The permit included a closure plan

describing the procedures for removal, cleaning and disposal of the underground waste storage tanks, and cleaning and decommissioning the other waste management units.

In 1998, Safety-Kleen Systems, Inc. was acquired by Laidlaw Environmental Services, Inc. As a result of the merger, the SK-Pasadena facility was designated for consolidation into the former Laidlaw Environmental Services facility in LaPorte, Texas. The underground storage tanks were removed in March 1999. In April 1999, business operations were suspended and the SK-Pasadena facility was closed.

Three TNRCC permitted waste units at Safety-Kleen's former Pasadena Service Center in Pasadena, Texas have been closed in accordance with (1) TNRCC permit No. HW-50260-001, (2) the TNRCC approved closure plan, (3) a TNRCC approved Class 1 Modification to the Closure Plan, (4) Title 30, Texas Administrative Code, Chapter 335 (30 TAC 335), and (5) Title 40 U.S. Code of Federal Regulations Part 264 Subchapter G (40 CFR 264 Subpart G). These units are Unit 02 (container storage area), Unit 03 (tank system) and Unit 04 (tank system). Documentation of these closures was provided in the original closure report (Closure of TNRCC Permitted Waste Units, Documentation of Waste Units Closure and Certificate of Completion; Environmental Decision Group, Inc., August 1999). The closure report also documents removal of Unit 01 (underground waste storage tank) and excavation of impacted soil with off-site disposal of the waste.

See CP Table II.

4. Site Geology, Hydrogeologic Conditions, and Relationship to Surface Water

For New, modified/amended Compliance Plan, please provide a Geology Report as required by Section VI.B of this application containing updated site geologic information including the following descriptions, maps and tables with appropriate supporting documentation [All maps should be at the scale of 1 inch equal to not more than 200 feet and legible when reduced to 8.5" by 11" letter size paper]:

- a. A description of the site geology for the facility. The geologic description should include a site geology map and sufficient cross sections (see Item h. below) to describe the uppermost aquifer and any confining stratigraphic unit(s) beneath the site.

See CP Table IX; Attachment B.

- b. A description of the site soils and subsurface lithologies using the Unified Soil Classification System. For those soil units which do not extend beneath the entire site area, the soil description should include a plan view map designating the soil's areal extent;

Not Applicable

c. Where a soil remedy is required in a corrective action program of Section XI.D.I. of this application for a Regulated Unit, SWMU and / or AOC, the applicant shall submit a description of contamination in soils of the vadose zone (unsaturated zone above the uppermost aquifer). The soil description should include maps indicating lateral and vertical extent of contamination;

Not Applicable

- d. A description and designation of the uppermost saturated zone or uppermost aquifer including the name, the type of unit (e.g. perched, confined, etc.), and groundwater characteristics (flow rates, directions, hydraulic conductivity, etc.). As defined in 40 CFR 260.10, an aquifer is a geologic formation, group of formation, or part of a formation, capable of yielding significant amount of groundwater to wells or springs. Persons using Texas Risk Reduction Program (TRRP) should also consider the definition of a groundwater bearing unit as a saturated geologic formation, group of formations, or part of a formation with a hydraulic conductivity of equal to or greater than 1×10^{-5} centimeters/second (30 TAC 350.4(a)40).

Based on the information contained in the Geology Report, complete CP Table IX-Description of Uppermost Aquifer. CP Table IX will become part of the Compliance Plan.

See CP Table IX; Attachment B.

- e. Present the geologic, stratigraphic and hydrogeological information; and
- f. **See CP Table IX; Attachment B.** Maps indicating the lateral and vertical extent of the contamination for each stratigraphic unit affected, with supporting documentation.

Not Applicable

- g. Current Contaminant Plume Map(s) Locating and identifying the extent of contamination as determined from previous monitoring on a separate facility base map(s). Locate and identify all monitor wells and waste management units/areas.
- h. **See Attachment B.** Cross section Cross section transect lines should be indicated on the Contaminant Plume Map. The applicant, at a minimum, must submit two (2) stratigraphic cross sections for each waste management unit/area. One cross section should be drawn through all the point of compliance wells and the second cross section should be drawn along the direction of the movement of the

contaminant plume released from the unit/ area. Cross sections should follow the requirements outlined in the Geologic and Hydrogeologic Report of Parts IV and V of this application. At a minimum, the cross sections should include the following information:

1. the stratigraphic interpretation (e.g., surface grade, uppermost aquifer, aquiclude);
 2. lithology/geologic description of the uppermost aquifer and aquiclude;
 3. the potentiometric surface;
 4. detected non-aqueous phase liquids (NAPLs) and hazardous constituents; and
 5. screen length and screen depth for each well in the cross section.
- i. **See Attachment B.** Well Construction diagram The report should include a well construction diagram for all wells used in the cross section. The well construction diagram should include the information in "Attachment B" of this (Compliance Plan) application. The well construction diagram information may be included on the geologic cross-section(s).
- j. **See Attachment B.** Describe the potential for any surface water bodies to be hydraulically connected to groundwater containing hazardous constituents. Apply the guidance provided in Determining PCLs for Surface Water and Sediment, RG-366/TRRP-24 Revised, December 2002, in order to determine the water body type and applicable surface water criteria for human health, aquatic life and wildlife, as applicable.

Not Applicable

B. Hazardous Constituents In Groundwater And Groundwater Protection Standards (GWPSs) Hazardous Constituents in Groundwater

For each contaminated hydrogeologic unit beneath a waste management unit/area (40 CFR 264.95), provide a list of all 40 CFR Part 264 Appendix IX hazardous constituents that have been detected in groundwater samples above background values, Practical Quantitation Limits (PQLs), or Method Quantitation Limits (MQLs). Please submit for each unit/area the most recent Appendix IX laboratory analysis results showing the constituents, constituent concentrations, methods used for analysis and associated laboratory QA/QC.

The groundwater samples (collected for the purpose of determining whether constituents listed in Appendix IX are present) shall be from each waste management unit/area monitoring well system as required by 30 Texas Administrative Code (TAC) 335.164 (detection monitoring program).

If the waste management unit/ area is subject to Corrective Action Program required by 30 TAC 335.166 or 335.167 and/or Compliance Monitoring required by 30 TAC 335.165, then list the unit/area and include the list of hazardous constituents and their principal degradation constituents in:

CP Table III - Corrective Action Program Table of Detected Hazardous and Solid Waste Constituents and the Groundwater Protection Standard; and

Constituents presented in CP III and CP IIIA were based on the original constituent list outlined in the initial permit issued November 10, 1993, and renewed November 1, 2004 and August 1, 20016. The list of detected constituents (Table III) and indicator parameters (Table IIIA), were used in the current renewal package and were previously approved on August 1, 2016. Table III constituents identified based on the historic knowledge of the waste managed in the units. Table IIIA are those constituents from Table III that have been detected.

See Table III.

CP Table IV - Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Practical Quantitation Limits or Method Quantitation Limits for Compliance Monitoring.

1. Groundwater Protection Standards (GWPSs)
The GWPS (30 TAC 335.158) is designed to ensure that hazardous constituents (30 TAC 335.159) identified in groundwater and their principal degradational constituents do not exceed concentrations that pose a present or potential hazard to human health and the environment. Compliance monitoring and corrective action programs for a Regulated Unit (30 TAC 335.165 and 335.166) and a corrective action program for a solid waste management unit (SWMU) (30 TAC 335.167) require human health and the environment to be protected from all releases of hazardous wastes and constituents. These corrective action and monitoring programs are evaluated using the GWPS. The GWPS is based on the following criteria.
 - a. Background Levels Background levels authorized under 30 TAC 335.160(a)
 - (1) are defined as constituent concentration values that are naturally occurring or are not influenced by contamination coming from the waste management unit. These values are established by statistical analysis of upgradient well sampling data. Analytical results from a sufficient number of independent samples are required to be utilized with an approved and appropriate statistical method. For guidance on the statistical methods consult, Statistical Analysis of Groundwater Data at RCRA Facilities-Unified Guidance, U.S. EPA, March 2009, and any subsequent updates to this document.Practical Quantitation Limits (PQLs) or Method Quantitation Limits (MQLs) are utilized in lieu of background values unless a background demonstration establishes concentrations for naturally occurring constituents. The PQL or MQL is defined in the footnote of CP Tables III and IV.
 - b. Primary and Secondary Maximum Contaminant Levels (MCLs) Maximum permissible level of a contaminant in water which is delivered to any user

- of a public water system (40 CFR Part 141 and 143, Federal Safe Drinking Water Act).
- c. Alternate Concentration Limits (ACLs) determined in accordance with 30 TAC 335.160(b) and are defined in footnote of CP Tables III and IV.
2. Establishing the Groundwater Protection Standard (GWPS)
 - a. If background, PQL or MQLs are proposed for the GWPS, the applicant must list all constituents (i.e., detected and degradational constituents) for which a GWPS is being applied for and the appropriate concentration limits. This information shall be submitted in the format of CP Tables III, and IV.

Alternate Concentration Limits (ACLs) ACLs are established at the point of compliance (POC) for a regulated or solid waste management unit (SWMU). All concentration values or limits listed in Section XI.B.I.c. are considered ACLs. ACLs are evaluated in accordance with the provisions of 30 TAC 335.160(b) and other regulations acceptable to the executive director. If an ACL is requested on the basis of Section XI.B.I.c. (MCLs), then no ACL demonstration is necessary. The ACL demonstration must establish constituent concentrations in groundwater in accordance with regulations acceptable to the executive director. This information shall be submitted in the format of CP Tables III and IV. Note that depending upon the rule employed [i.e., 30 TAC 335 Subchapter S - Risk Reduction Rules (RRR) or 30 TAC 350 - Texas Risk Reduction Program (TRRP)], the applicant should determine the GWPS for the point of compliance and point of exposure, as applicable, in accordance with the remedy standard being utilized.
 - b. If the contaminant plume discharges or has a potential to discharge into surface water, then the facility must also comply with 30 TAC Chapter 307 (Texas Surface Water Quality Standards) unless other regulatory requirements acceptable to the executive director are requested.

CP Table IV does not apply.

C. Compliance Monitoring Program

This submittal is a renewal of existing plan and no changes are required to the existing Compliance Monitoring Program.

As required by 30 TAC 335.165, an owner or operator must monitor the groundwater to determine whether Regulated Units are in compliance with the Groundwater Protection Standard (GWPS) under 30 TAC 335.158. The applicant must provide the following information when proposing a compliance monitoring program.

1. Groundwater Monitoring Program Description
 - a. Describe the proposed groundwater monitoring system to be used to monitor compliance with the GWPS which includes the following information.
 - (1) Changes, if applicable, from the current detection monitoring system or compliance monitoring system groundwater monitoring program at the waste management unit that will be required to comply with the compliance monitoring program described in 30 TAC 335.165. This description should

address changes concerning:

- (a) Geological and/or hydrogeological information differences since the submittal of the previous application [must submit an updated Geologic and Hydrogeologic Report required by Section XI.A.4];
- (b) Waste management areas/units;
- (c) Construction details for monitor wells to evaluate compliance with "Attachment B" well specification requirements;
- (d) The number and locations of additional monitor wells [also see Section XI.C.I.b.(2)];
- (e) Sample handling, chain of custody, and analytical procedures (also see "Attachment C");
- (f) Frequency of monitoring;
- (g) Monitoring parameters;
- (h) Evaluation of compliance with GWPS (Statistical Methods);
- (i) Other Sampling and Analysis Plan information to be compliant with "Attachment C";
- (j) Compliance period as defined in Section XI.E.I.c. of the application;
- (k) Financial assurance (see Section XI.E.); and
- (l) An ACL variance under 30 TAC 335.160(b), if applicable.

Not Applicable

- (2) The number, depth and location of all monitor wells (Background Wells, Point of Compliance Wells, Observation Wells, Piezometers, etc.). Complete CP Table V – Designation of Wells by Function and make changes as applicable to plans referenced in Section XI.C.1.b.

Not Applicable

- (3) The proposed hazardous constituent monitoring list which is based on constituents that were monitored during detection monitoring (if applicable), constituents detected in accordance with 30 TAC 335.164, and degradational constituents identified in CP Table III accordingly to develop the constituent list for the Corrective Action Monitoring Program. CP Table III shall become part of the final Compliance Plan.

CP Table III is Not Applicable.

- (4) The proposed indicator parameter monitoring list. From the list of constituents and GWPS identified in CP Table III complete CP Table IIIA - Corrective Action Program Table of Indicator Parameters and the Groundwater Protection Standard, accordingly. CP Table IIIA shall become part of the Compliance Plan to be analyzed at least semiannually as required by 30 TAC 335.166(7).

Please see CP Table III and CP Table IIIA.

- (5) Frequency of monitoring should be specified in CP Table VIII

CP Table VIII is Not Applicable because no changes are being made to the currently approved Compliance Plan.

- (6) Provisions for reporting groundwater data at least on an annual basis should be specified in CP Table VII

Please see CP Table VII.

- (7) Annual determination of contamination plume rate and direction of migration.

- (8) Compliance period. Calculate the compliance period as required by 30 TAC 335.162 and 335.165(1)(d). Include calculations and complete CP Table VI - Compliance Period for RCRA-Regulated Units which shall become part of the final Compliance Plan

b. Submit the following plans and reports.

- (1) Current Sampling and Analysis Plan. The Sampling and Analysis Plan must include information required by 30 TAC 335.163(4) and 335.163(5) and 40 CFR Subpart 270.30(j). For guidance, please see "Attachment C" to the application.

Please see CP Attachment C Sampling and Analysis Plan.

- (2) Monitoring System Plan If the applicant is proposing a monitoring well or a monitoring system in the application, the applicable well installation specifications outlined in "Attachment B" of this application should be followed. All new monitoring wells must be installed in accordance with the specifications outlined in "Attachment B", unless an alternative design is approved by the agency prior to installation. If the applicant proposes as part of the monitoring system, any well (existing or proposed) that does not meet or exceed the requirements outlined in "Attachment B", then the proposed alternative design must be described in detail in the Monitoring System Plan and must be submitted with this application. The Monitoring System Plan must include:

- (a) Monitoring System Design and Specifications Certified by a qualified engineer and/or geologist which provides detailed plans and specifications on the monitoring system design; and
- (b) Well Drilling and Well Casing Specifications Certified by a qualified engineer and/or geologist which provides details on well casing specification, drilling logs and reports.

Not Applicable

- (3) Current Geologic and Hydrogeologic Report Provide a report per Section X.I.A.4 of this application discussing the geologic and hydrogeologic conditions of the facility and the specific area affected by the waste management areas. This report should include the most up-to-date information from which the design of the groundwater monitoring system was based.

Not Applicable

2. Waste Management Units Monitored
- a. Delineate and identify the following for each waste management unit in the proposed groundwater monitoring program.
1. Boundary of the waste management unit and, if applicable, the proposed waste management area which includes more than one waste management unit (identify all waste management units which are included in the waste management area). These waste management units subject to compliance monitoring should be listed in CP Table I - Waste Management Units and Areas Subject to Groundwater Corrective Action and Compliance Monitoring which shall become part of the final Compliance Plan.
 2. The proposed point of compliance (30 TAC 335.161) and point of exposure wells.
 3. Any other proposed monitor wells such as supplemental wells, observation wells, background wells, etc. If appropriate the groundwater monitoring system should have a sufficient number of wells be designated to monitor the downgradient extent of the plume.
 4. Features which may serve as conduits for subsurface contamination.
- b. For each waste management unit/area in the proposed groundwater monitoring system, submit the locations of individual waste management unit/area monitor wells (existing or proposed) and any soil borings plugged and unplugged specifically drilled for assessment of contamination. These individual monitor wells shall be identified by respective well number on a plan view drawing and only the background, point of compliance and/or point of exposure wells should be indicated in CP Table V - Designation of Wells by Function. The plan view map depicting the location of individual monitoring wells for compliance monitoring should be labeled as "CP Attachment A, sheet xx of xx" in the text box. The title box should also include reference to the facility name, Permit/Compliance Plan Number, Solid Waste Registration Number, Unit Description or name with Notice of Registration (NoR) Unit No. 0000. The "CP Attachment A" map(s) and CP Table V shall also become part of the final Compliance Plan.
3. Implementation Schedule
- Itemize and discuss, in detail, the estimated time schedule necessary for any testing and assessments, system design, construction and installation, and final implementation of the groundwater monitoring program for each Regulated Unit and solid waste management unit. If the schedule of implementation for items are not completed at the time of the application or are not completed at the time of

issuance of the final draft Permit/Compliance Plan, then the items should be added to the CP Table VIII - Compliance Schedule of the application.

Not Applicable

D. Corrective Action Program

Over the history of the site, the Corrective Action Program has included installation of a product recovery system (NOR Unit 006 and 007; both no longer in use and injection of sodium persulfate in temporary injection points. Currently, the site is utilizing natural attenuation and routine monitoring as the corrective action for the site, as outlined in the Sampling and Analysis Plan (CP Attachment C).

E. Cost Estimates For Financial Assurance

As required by 30 TAC 335.156 and 335.167, the applicant must provide cost estimates for groundwater monitoring and corrective action to determine the amount of financial assurance. Please complete the applicable parts of this form. Cost estimates should be filled out for each proposed corrective action/monitoring system at the site; or any additional corrective action system not covered in this Part. Please note, the Executive Director may request from the applicant documentary evidence for cost estimates.

If an item is not applicable, please mark it NA.

General Information:

1. For each Waste Management Area (WMA) list the following:

- a. A description of the waste management unit(s) in the WMA (e.g., landfill, surface impoundment, land treatment);

All WMAs are closed at the facility.

- b. The NoR unit number(s) in the WMA; and the compliance period for the WMA listed above.
Year(s) = _____
- c. (The compliance period is the number of years equal to the active life of the waste management area as defined in 30 TAC 335.162).
- d. In instances where the compliance period is equal to or exceeds 30 years, the maximum amount of financial assurance required will be based on 30 years because the required post-closure care period to perform corrective action and groundwater monitoring is 30 years. In instances where the compliance period is less than 30 years, the financial assurance for corrective action or compliance monitoring will be based on the longest time frame established by one of the following criteria:
 - (1) The duration of your compliance plan;

- (2) The time frame for clean-up based on model projections and historical data as approved by the Executive Director; or
- (3) The compliance period for the unit/area/
Total Years Used to Calculate the Financial Assurance for the
Corrective Action and/or Compliance Monitoring Program
Year(s) = 10

2. Please complete Table XI.E.1. – Corrective Action Program Cost Estimate.

Not Applicable

3. Please complete Table XI.E.2. – Groundwater Monitoring Cost Estimate.

See Appendix XI.E.2.e - Table XI.E.2.e

4. Please complete Table XI.E.3. – Financial Assurance Summary.

See Appendix XI.E.3 - Table XI.E.3.

Table XI.A.1. - Facility History for Waste Management Units

Name of Waste Management Unit ¹	Type of Waste Management Unit	Notice of Registration Unit Number	Date Waste Was <i>First</i> Placed in Unit	EPA Waste Code	Estimated Capacity of Unit	Quantity of Waste Left in Place	Date Waste Was Last Placed in Unit ²	Date of Unit Closure or Projected Closure	Date Unit Certified Closed ³	Is There Evidence of a Release of Hazardous Constituent(s) ⁴ to Groundwater? (Yes, No, or Unknown)
1	Storage for groundwater treatment system and groundwater monitoring	SWMU No. 6 & 7	N/A	03011011 20041141	515	0	2014	No longer active		Not from these units
2	Tank (sub-surface)	1	11/1993	0501203H, 0527695H	12,000	0	03/1999	09/1999		Not from this unit
3	Container Storage Area	2	11/1993	NA	4,464	0	08/1999	09/1999		Not from this unit
4	Tank (Surface)	3	11/1993	0501203H, 0527695H	162	0	08/1999	09/1999		Not from this unit
5	Tank (Surface)	4	11/1993	0501203H, 0527695H	162	0	08/1999	09/1999		Not from this unit
6	Miscellaneous storage containers	5	11/1993	03009992, 03011011	10,000	0	08/1999	11/2009		Not from this unit

Footnotes:

1. Indicate by asterisk (*) those waste management units that have received any hazardous waste constituent listed in Appendix VIII of 40 CFR Part 261.
2. For the purposes of this Compliance Plan Application, a waste management unit receiving hazardous waste after July 26, 1982, shall be considered a RCRA-regulated Unit. A waste management unit that ceased receiving hazardous waste on or before that date shall be considered a Solid Waste

Management Unit (SWMU).

3. The date the applicant submitted certification of closure to the Commission.
4. Hazardous constituents are those hazardous constituents listed in Appendix IX of 40 CFR Part 264.

Table XLE. – General Information

Waste Management Area/Unit Description	NOR No. (if applicable)	Compliance Period for Waste Management Area/Unit ^{1, 2}
Historic Spillage area	#005 – closed 2002	7

Footnotes:

1. The compliance period is the number of years equal to the active life of the waste management area as defined in 30 TAC 335.162
2. In instances where the compliance period is equal to or exceeds 30 years, the maximum amount of financial assurance required will be based on 30 years because the required post-closure care period to perform Corrective Action and groundwater monitoring is 30 years. In instances where the compliance period is less than 30 years, the financial assurance for Corrective Action or Compliance Monitoring will be based on the longest time frame established by one of the following criteria:
 - a. the duration of your Compliance Plan;
 - b. the estimated time frame for clean-up based on model projections and historical data as approved by the Executive Director; or
 - c. the compliance period for the unit/area.

Table XLE.1. Corrective Action Program Cost Estimate

Task	Cost
1. Pumping Capacity Per Year:	
A. Daily average system pumping rate	gal/day
B. Annual groundwater volume recovered	gal/yr
2. Off-Site Liquid Treatment / Disposal Cost:	
A. Volume of treated contaminated water to be disposed of off-site yearly	50 gal/yr
B. Transportation of liquid waste disposed of off-site yearly	
(1) Transportation cost per gallon	5 \$/gal
(2) Gallons of contaminated water shipped per year	50 gal/yr
(3) Annual cost of transportation (1 x 2)	250 \$/yr
C. On-site yearly storage cost prior to off-site disposal	50 \$/yr
D. Off-site yearly treatment cost of liquid waste	
(1) Treatment charge per gallon	0.40 \$/gal
(2) Total volume to be treated per year	50 gal/yr
(3) Annual treatment cost (1 x 2)	20 \$/yr
E. Off-site disposal cost of liquid waste per year	
(1) Disposal charge per gallon	\$/gal
(2) Total volume to be disposed per year	gal/yr
(3) Annual disposal cost (1 x 2)	\$/yr
Annual Off-Site Liquid Treatment / Disposal Cost (2B3 + 2C + 2D3 + 2E3)	320 \$
3. On-site Wastewater Treatment System Cost and On-site Treatment / Disposal Cost:	
Submit a cost estimate for a treatment system specifically designed and used exclusively for the groundwater Corrective Action Program and operational after some start up maintenance. Estimates to clean out the system should also be included in the following cost.	
A. Initial capital expenditure for treatment system including start up maintenance	\$
On-Site Wastewater Treatment System Capital Cost (3A)	\$

B. Gallons of contaminated water to be treated on-site per year	gal/yr
C. Cost of on-site treatment per gallon	\$/gal
D. Cost of sludge or solids disposal per year	\$/yr
E. Cost per year of maintenance on treatment system and recovery system, along with any additional equipment and repairs needed for the systems	\$/yr
F. Cost of on-site disposal per year	\$/yr
Annual On-Site Treatment / Disposal Cost [(3B x 3C) + 3D + 3E + 3F]	\$
4. Inspections, Maintenance and Operation Cost for the Corrective Action Program:	
A. Operator's time on-site for inspections and maintenance per year	hr/yr
B. Charge of salary per hour	\$/hr
C. Annual cost of labor (4A x 4B)	\$/yr
D. Replacement cost of parts and equipment per year	\$/yr
E. Electricity cost per year	\$/yr
Annual Inspections / Maintenance / Operation Cost for the Corrective Action Program (4C + 4D + 4E)	\$

Table XIE.2.e - Groundwater Monitoring Cost Estimate

Task	Cost
1. Annual Sampling and Analysis Cost	
A. Background Wells	
(1) Number of wells	1
(2) Sample analysis cost per well	150 \$/well
(3) Number of sampling events per year	2 /yr
(4) Sampling cost (1 x 2 x 3)	\$300
B. Point of Compliance Wells	
(1) Number of wells	4
(2) Sample analysis cost per well	150 \$/well
(3) Number of sampling events per year	2 /yr
(4) Sampling cost (1 x 2 x 3)	\$1,200
C. Recovery Wells	
(1) Number of wells	2
(2) Sample analysis cost per well	150 \$/well
(3) Number of sampling events per year	2 /yr
(4) Sampling cost (1 x 2 x 3)	\$600
D. Corrective Action Observation Wells	
(1) Number of wells	5
(2) Sample analysis cost per well	150 \$/well
(3) Number of sampling events per year	2 /yr
(4) Sampling cost (1 x 2 x 3)	\$1,500
E. Point of Exposure Wells	
(1) Number of wells	4
(2) Sample analysis cost per well	150 \$/well
(3) Number of sampling events per year	2 /yr
(4) Sampling cost (1 x 2 x 3)	\$1,200
F. Supplemental Wells	
(1) Number of wells	

(2) Sample analysis cost per well	\$/well
(3) Number of sampling events per year	/yr
(4) Sampling cost (1 x 2 x 3)	
G. Field Quality Control Sampling	
(1) Number of wells	1
(2) Sample analysis cost per well	150 \$/well
(3) Number of sampling events per year	2 /yr
(4) Sampling cost (1 x 2 x 3)	\$300
2. Sampling Labor Cost:	
A. Hours of sampling per well	1 hrs/well
B. Number of sampling technicians per well	2 /yr
C. Charge per hour	50 \$/hr
D. Total number of wells to be sampled annually	
E. Total number of wells sampled semi-annually	13
F. Total number of wells sampled quarterly	
G. Total number of wells sampled monthly	
H. Total number of wells sampled per year (2D) + (2E x 2) + (2F x 4) + (2G x 12)	26
I. Sampling Labor Cost (2A x 2B x 2C x 2H)	\$2,600
Annual Groundwater Monitoring Cost (Annual Sampling and Analysis Cost + Sampling Labor Cost)	\$7,700
3. Well Installation (typical cost):	
A. Monitor well installation cost per well	\$/well
B. Number of monitor wells to be installed	
C. Cost of monitor well system (3A x 3B)	
D. Recovery well installation cost per well	\$/well
E. Number of Recovery Wells to be installed	
F. Cost of Recovery well system (3D x 3E)	
Total Well Installation Cost (3C + 3F)	
4. Administrative Cost:	
A. Annual cost for record-keeping and report preparation	\$5,000

Annual Administrative Cost (4A)	5,000 \$
5. Inspection and Maintenance Cost for the Monitoring Program:	
A. Operator's time (hours) on-site for inspections and maintenance per year	52 \$/hr
B. Charge or salary per hour	50 \$/hr
C. Annual cost of labor (4A x 4B)	2,600 \$/hr
D. Replacement of parts and equipment per year	1,000 \$/hr
Annual Inspections / Maintenance Cost for the Groundwater Monitoring Program (5C + 5D)	\$3,600

Table XIE.3. - Financial Assurance Summary

Task	Cost
Annual Off-Site Liquid Treatment / Disposal Cost	\$320
Annual On-Site Treatment / Disposal Cost	
Annual Inspection / Maintenance / Operation Cost for the Corrective Action Program	
Annual Groundwater Monitoring Cost	\$7,700
Annual Administrative Cost	\$5,000
Annual Inspection and Maintenance Cost for the Groundwater Monitoring Program	\$3,600
Annual Subtotal	\$16,620
Total Years Used for Calculating Financial Assurance for Corrective Action and/or Compliance Monitoring Program	10 Years
Remediation Cost (Annual Subtotal x Total Years Used)	\$166,200
On-Site Wastewater Treatment System Capital Cost Total	\$0
Total Well Cost	\$0
10% Contingency	\$16,620
Grand Total Cost (round to nearest \$1000)	\$183,000

**CP Table I: Waste Management Units and Areas Subject to Groundwater
Corrective Action and Compliance Monitoring**

A. Corrective Action¹ (30 TAC Section 335.166)

Unit Name	Notice of Registration (NOR) Number, if applicable
Historic spillage area	#005

B. Compliance Monitoring¹ (30 TAC Section 335.165)

Unit Name	Notice of Registration (NOR) Number, if applicable
Reserved	

C. Corrective Action² (30 TAC Section 335.167)

Unit Name	Notice of Registration (NOR) Number, if applicable	Unit Type (SWMU or AOC)
Reserved		

D. Alternative Corrective Action³ (30 TAC Section 335.151)

Unit Name	Notice of Registration (NOR) Number, if applicable	Unit Type (RCRA-regulated unit, SWMU, or AOC)
Reserved		

E. Facility Operations Area (FOA)⁴ (30 TAC Section 335.156 and Chapter 350 Subchapter G)

Unit Name	Notice of Registration (NOR) Number, if applicable	Unit Type (RCRA-regulated unit, SWMU, or AOC)
Reserved		

Footnotes:

1. Program applies to RCRA-regulated units only.

2. Program applies to releases from solid waste management units (SWMUs) and/or areas of concern (AOCs).
3. Program applies to commingled releases from a RCRA-regulated unit(s) and from one or more SWMUs and/or AOCs.
4. List the RCRA-regulated units, SWMUs, and/or AOCs which are located within the FOA boundary that are subject to Corrective Action.

List the RCRA-regulated units, SWMUs, and/or AOCs which are located outside of the FOA boundary and are subject to Compliance Monitoring and/or Corrective Action separately in CP Table I.A., I.B., I.C., or I.D. as appropriate.

CP Table II: Solid Waste Management Units and/or Areas of Concern Addressed in Permit Section XI.H. for which Corrective Action Applies Pursuant to 30 TAC Section 335.167

Unit Name ³	NOR Number, if applicable	SWMU or AOC	Affected Media ¹	Date Program Requirement and Remedy Standard Completed ²
Historic Spillage area	#005	NA	Groundwater	Reserved

SWMU = Solid Waste Management Unit; AOC = Area of Concern; NOR = Notice of Registration

Footnotes:

1. Specify the affected media [i.e., soil, groundwater (GW), surface water (SW), or sediment (SED)].
2. For each SWMU or AOC which has completed the Corrective Action Program objectives, specify the Remedy Standard (or Risk Reduction Standard) that was completed, the date of the Commission's No Further Action (NFA) approval letter for all affected media of concern, and the land use used to obtain NFA.
3. For sites with an authorized Facility Operations Area (FOA), list all SWMUs and/or AOCs located within the FOA boundary and outside of the FOA boundary that are subject to Corrective Action at the site.

Please separate the SWMUs and/or AOCs that are located within the FOA boundary from the SWMUs and/or AOCs that are located outside of the FOA boundary.

Notes:

- a) CP Table II lists SWMUs and/or AOC which have been identified in the RCRA Facility Assessment (RFA) Report as having a release(s) or potential releases of hazardous waste, hazardous constituents, or other chemicals of concern. The Permittee is thus required to meet Corrective Action objectives in accordance with Permit Section XI.H. and 30 TAC Section 335.167.
- b) The Permittee shall update CP Table II when a new SWMU and/or AOC which requires Corrective Action is identified.
- c) The Permittee shall also update CP Table II when the Corrective Action status of an affected media for a SWMU or AOC has changed as outlined in Footnote No. 2.
- d) SWMUs and/or AOCs shall not be deleted from this table when the Corrective Action

objectives have been completed and a NFA determination has been approved for the SWMU and/or AOC. In accordance with Permit Section XI.H., CP Table II is intended to be a historical record of the facility's corrective actions and to reflect when the Corrective Action objectives have been met for each SWMU/AOC.

- e) There may be cases in which the Permittee fulfills the Corrective Action objectives for soils at a SWMU/AOC, but long-term monitoring and corrective action may be necessary to meet the groundwater Corrective Action objectives. In such instances, the SWMU/AOC would be listed in CP Table I.C and would be subject to all applicable provisions of this Compliance Plan. If a release from a SWMU/AOC is commingled with a RCRA-regulated unit, then the unit and the SWMU/AOC would be listed in CP Table I.D. In accordance with Permit Section XI.H, once the Corrective Action objectives for groundwater are completed, then the Permittee shall modify or amend the Compliance Plan to reassign the SWMU/AOC in CP Table I.C (or CP Table I.D) to CP Table II. CP Table II should reflect the new status of the SWMU/AOC and include the Remedy Standard (or Risk Reduction Standard) that was completed, the date of the NFA approval letter for all affected media of concern, and the land use used to obtain NFA.

CP Table III: Corrective Action Program Table of Detected Hazardous and Solid Waste Constituents and the Groundwater Protection Standard

Unit Name	Column A Hazardous Constituents	Column B Groundwater Protection Standards (mg/L) at the POC ^{1,3}		Column C Groundwater Protection Standards (mg/L) at the POE, APOE, or FBOC ^{2,3}	
Historic spillage area	Acetone	22	GWGWIng	22	GWGWIng
	Benzene	0.005	GWGWIng	0.005	GWGWIng
	2-Butanone (MEK)	15	GWGWIng	15	GWGWIng
	Chlorobenzene	0.1	GWGWIng	0.1	GWGWIng
	Chloroethane	9.8	GWGWIng	9.8	GWGWIng
	Chloroform	0.08	GWGWIng	0.08	GWGWIng
	*1,2 Dichlorobenzene	0.60	GWGWIng	0.60	GWGWIng
	1,4 Dichlorobenzene	0.075	GWGWIng	0.075	GWGWIng
	1,1 Dichloroethane	4.9	GWGWIng	4.9	GWGWIng
	cis-1,2-Dichloroethene	0.070	GWGWIng	0.070	GWGWIng
	trans-1,2-Dichloroethene	0.10	GWGWIng	0.10	GWGWIng
	Ethylbenzene	0.70	GWGWIng	0.70	GWGWIng
	1,1,1,2-Tetrachloroethane	0.035	GWGWIng	0.035	GWGWIng
	1,1,2,2-Tetrachloroethane	0.0046	GWGWIng	0.0046	GWGWIng
	1,1,1-Trichloroethane	0.2	GWGWIng	0.2	GWGWIng
	Trichloroethene	0.005	GWGWIng	0.005	GWGWIng
	Toluene	1.0	GWGWIng	1.0	GWGWIng
	Vinyl Chloride	0.002	GWGWIng	0.002	GWGWIng
	Xylenes	10.0	GWGWIng	10.0	GWGWIng
	Chromium	0.10	GWGWIng	0.10	GWGWIng
	Lead	0.015	GWGWIng	0.015	GWGWIng

Notes:

- If the Corrective Action Program (Provision XI.E.) does not apply to the RCRA-regulated units, SWMUs, or AOCs at the facility, delete the contents of the table and add "Reserved" to the first row of CP Table III.
- CP Table III represents the long list of hazardous constituents that are reasonably expected to be in, or derived from, the waste placed in each RCRA-regulated unit, SWMU, and/or AOC listed in the table. CP Table III also lists the hazardous constituents that

have been historically detected in the groundwater for each RCRA-regulated unit, SWMU, and/or AOC. These hazardous constituents are monitored in accordance with Provision XI.F.3.c.(1).

- c) In accordance with Provision XI.D.6., the Groundwater Protection Standards (GWPS) must be met before the Corrective Action Program can be terminated for the RCRA-regulated unit, SWMU, and/or AOC.
- d) If applicable, "Appendix IX" can be used in Column A for a unit instead of listing each chemical of concern (COC). The Permittee may petition the Executive Director for the deletion of a specific COC from the Appendix IX analysis if the Permittee can demonstrate that the COC was never used in the facility's operations nor was disposed of in the unit.
- e) Attenuation monitoring point (AMP) wells, corrective action system (CAS) wells, and corrective action observation (CAO) wells should not be listed in CP Table III. These wells should only be depicted in the CP Attachment A maps. Once an AMP, CAS, or CAO well meets its respective attenuation action levels (AALs) or GWPS, then the Permittee may propose to discontinue monitoring that well without modification to the Permit. If the AMP, CAS, or CAO well is listed in CP Table III, then any proposed change to the well would require modification to the Permit. Changes to the wells depicted in the CP Attachment A maps can be approved in the Groundwater Monitoring Report required by CP Table VII and Provision XI.G.3 and become a part of the Permit by reference.
- f) POC = point of compliance; POE = point of exposure; APOE = alternate point of exposure (only applicable for an authorized plume management zone [PMZ]); and FBOC = Facility Operation Area (FOA) Boundary of Compliance (only applicable for an authorized FOA).

Footnotes:

- 1. Use Column B to specify the GWPS assigned at the POC for a RCRA-regulated unit subject to Corrective Action or for a SWMU/AOC subject to the Risk Reduction Rules. Put "N/A" if not applicable.
- 2. Use Column C to specify the GWPS assigned at the POE, APOE (PMZ only), or FBOC (authorized FOA only). Put "N/A" if not applicable.
- 3. For each COC, include the appropriate GWPS designation to demonstrate that the Corrective Action Program objectives are being achieved either under the Risk Reduction Rules (RRR) pursuant to 30 TAC Chapter 335 or the Texas Risk Reduction Program (TRRP) pursuant to 30 TAC Chapter 350. The RRR and TRRP GWPS designations and definitions may not be combined pursuant to 30 TAC Section 350.2(m).

ACL = alternative concentration limit; PCL = protective concentration level; RSA = Remedy Standard A; RSB = Remedy Standard B

RRR GWPS Designations and Definitions

MSC	ACL pursuant to 30 TAC Section 335.160(b) based upon the groundwater Medium-Specific Concentration (MSC), Residential (or Industrial) Risk Reduction Standard No. 2 (or No. 3) specified in 30 TAC Section 335 Subchapter S.
MCL	ACL pursuant to 30 TAC Section 335.160(b) based upon the Groundwater

Maximum Contaminant Level (MCL) specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subparts B and G.

SMCL	ALC pursuant to 30 TAC Section 335.160(b) based upon the Groundwater Secondary Maximum Contaminant Level (SMCL) specified in 40 CFR Part 143, National Secondary Drinking Water Regulations.
AL	ACL pursuant to 30 TAC Section 335.160(b) based upon the Action Level (AL) specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subpart I.
BKG	Background as determined in accordance with <u>Provision XI.F.1.</u>
ND	Non-detectable at the practical quantitation limit (PQL) as determined by the analytical methods of the most recent edition of EPA SW-846, and as listed in the July 8, 1987, edition of the Federal Register and later editions. The PQL is the lowest concentration of an analyte in groundwater that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating conditions.

TRRP GWPS Designations and Definitions

^{GW} GW _{Ing}	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater ingestion PCL determined under RSA or RSB (Residential or Commercial/Industrial) for Class 1 or Class 2 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table. In accordance with 30 TAC Section 350.72(b), ^{GW} GW _{Ing} PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to 1x10E-4) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 noncarcinogenic chemicals of concern within a source medium.
^{GW} GW _{Class3}	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater PCL determined under RSA or RSB (Residential or Commercial/Industrial) for Class 3 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
^{Air} GW _{Inh-V}	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the inhalation of volatile constituents from groundwater PCL determined under RSA or RSB (Residential or Commercial/Industrial) for Class 1, 2, or 3 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
^{SW} GW	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater-to-surface water PCL determined under RSA or RSB (Residential or Commercial/Industrial). The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

^{SED} GW	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater-to-sediment PCL determined under RSA or RSB (Residential or Commercial/Industrial). The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
^{ECO} GW	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater PCL protective of ecological receptor(s) determined under RSA or RSB (Residential or Commercial/Industrial). The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
BKG	Background as determined in accordance with <u>Provision XLF.1</u> .
ND	Non-detectable at the method quantitation limit (MQL) as determined by the analytical methods of the most recent edition of EPA SW-846 and as listed in the July 8, 1987, edition of the Federal Register and later editions. The MQL is defined in 30 TAC Section 350.4(54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

CP Table IIIA: Corrective Action Program Table of Indicator Parameters and the Groundwater Protection Standard

Unit Name	Column A Hazardous Constituents	Column B Groundwater Protection Standards (mg/L) at the POC ^{1, 3}		Column C Groundwater Protection Standards (mg/L) at the POE, APOE, or FBOC ^{2, 3}	
Historic Spillage area	Benzene	0.005	GWGWIng	0.005	GWGWIng
	Chlorobenzene	0.1	GWGWIng	0.1	GWGWIng
	1,2 Dichlorobenzene	0.60	GWGWIng	0.6	GWGWIng
	1,4 Dichlorobenzene	0.075	GWGWIng	0.075	GWGWIng
	cis-1,2-Dichloroethene	0.070	GWGWIng	0.070	GWGWIng
	trans-1,2-Dichloroethene	0.10	GWGWIng	0.1	GWGWIng
	Ethylbenzene	0.70	GWGWIng	0.7	GWGWIng
	1,1,1-Trichloroethane	0.2	GWGWIng	0.2	GWGWIng
	Toluene	1.0	GWGWIng	1.0	GWGWIng
	Vinyl Chloride	0.002	GWGWIng	0.002	GWGWIng
	Xylenes	10.0	GWGWIng	10.0	GWGWIng
	1,1 Dichloroethane	4.9	GWGWIng	4.9	GWGWIng
	Chromium	0.10	GWGWIng	0.10	GWGWIng
	Lead	0.015	GWGWIng	0.015	GWGWIng

Notes:

- If the Corrective Action Program (Provision XI.E.) does not apply to the RCRA-regulated units, SWMUs, or AOCs at the facility, delete the contents of the table and add "Reserved" to the first row of CP Table IIIA.
- CP Table IIIA represents the short list of hazardous constituents (i.e., indicator parameters) developed from CP Table III and are monitored on a frequency specified in CP Table VIII to verify that the ground water protection standards (GWPS) are met.
- In accordance with Provision XI.D.6, the GWPS must be met before the Corrective Action Program can be terminated for the RCRA-regulated unit, SWMU and/or AOC.
- If applicable, "Appendix IX" can be used in Column A for a unit instead of listing each chemical of concern (COC). The Permittee may petition the Executive Director for the deletion of a specific COC from the Appendix IX analysis if the Permittee can demonstrate that the COC was never used in the facility's operations nor was disposed of in the unit.
- Attenuation monitoring point (AMP) wells, corrective action system (CAS) wells, and corrective action observation (CAO) wells should not be listed in CP Table IIIA. These wells should only be depicted in the CP Attachment A maps. Once an AMP, CAS, or CAO well meets its respective attenuation action levels (AALs) or GWPS, then the Permittee

may propose to discontinue monitoring that well without modification to the Permit. If the AMP, CAS, or CAO well is listed in CP Table IIIA, then any proposed change to the well would require modification to the Permit. Changes to the wells depicted in the CP Attachment A maps can be approved in the Groundwater Monitoring Report required by CP Table VII and Provision XI.G.3 and become a part of the Permit by reference.

- f) POC = point of compliance; POE = point of exposure; APOE = alternate point of exposure (only applicable for an authorized plume management zone [PMZ]); FBOC = Facility Operations Area (FOA) Boundary of Compliance (only applicable for an authorized FOA).

Footnotes:

1. Use Column B to specify the GWPS assigned at the POC for a RCRA-regulated unit subject to Corrective Action or for a SWMU/AOC subject to the Risk Reduction Rules. Put "N/A" if not applicable.
2. Use Column C to specify the GWPS assigned at the POE, APOE, or FBOC. Put "N/A" if not applicable.
3. For each COC, include the appropriate GWPS designation to demonstrate that the Corrective Action Program objectives are being achieved either under the Risk Reduction Rules (RRR) pursuant to 30 TAC Chapter 335 or the Texas Risk Reduction Program (TRRP) pursuant to 30 TAC Chapter 350. The RRR and TRRP GWPS designations and definitions may not be combined pursuant to 30 TAC Section 350.2(m).

ACL = alternative concentration limit; PCL = protective concentration level; RSA = Remedy Standard A; RSB = Remedy Standard B

RRR GWPS Designations and Definitions

MSC	ACL pursuant to 30 TAC Section 335.160(b) based upon the groundwater Medium-Specific Concentration (MSC), Residential (or Industrial) Risk Reduction Standard No. 2 (or No. 3) specified in 30 TAC Section 335 Subchapter S.
MCL	ACL pursuant to 30 TAC Section 335.160(b) based upon the groundwater Maximum Contaminant Level (MCL) specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subparts B and G.
SMCL	ALC pursuant to 30 TAC Section 335.160(b) based upon the groundwater Secondary Maximum Contaminant Level (SMCL) specified in 40 CFR Part 143, National Secondary Drinking Water Regulations.
AL	ACL pursuant to 30 TAC Section 335.160(b) based upon the Action Level (AL) specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subpart I.
BKG	Background as determined in accordance with <u>Provision XI.F.1.</u>
ND	Non-detectable at the practical quantitation limit (PQL) as determined by the analytical methods of the most recent edition of EPA SW-846 and as listed in the July 8, 1987, edition of the Federal Register and later editions. The PQL is the lowest concentration of an analyte in groundwater that can be reliably determined within specified limits of precision and accuracy by the indicated

methods under routine laboratory operating conditions.

TRRP GWPS Designations and Definitions

^{GW} GW _{Ing}	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater ingestion PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table. In accordance with 30 TAC Section 350.72(b), ^{GW} GW _{Ing} PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to 1x10E-4) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 noncarcinogenic chemicals of concern within a source medium.
^{GW} GW _{Class3}	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 3 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
^{Air} GW _{Inh-V}	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the inhalation of volatile constituents from groundwater PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1, 2, or 3 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
^{SW} GW	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater-to-surface water PCL determined under RSA or RSB (Residential or Commercial/Industrial). The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
^{SED} GW	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater-to-sediment PCL determined under RSA or RSB (Residential or Commercial/Industrial). The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
^{ECO} GW	ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater PCL protective of ecological receptor(s) determined under RSA or RSB (Residential or Commercial/Industrial). The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
BKG	Background as determined in accordance with <u>Provision XLF.1</u> .
ND	Non-detectable at the method quantitation limit (MQL) as determined by the analytical methods of the most recent edition of EPA SW-846 and as listed in the July 8, 1987, edition of the Federal Register and later editions. The MQL is

defined in 30 TAC Section 350.4(54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

CP Table IV: Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Quantitation Limits

Unit Name	Column A Hazardous Constituents	Column B Concentration Limits (mg/L) ^{1, 2}	
RESERVED			

Notes:

- If there are no RCRA-regulated units subject to the Compliance Monitoring Program pursuant to 30 TAC Section 335.165, delete the contents of the table and add “Reserved” to the first row of CP Table IV.
- CP Table IV represents the long list of hazardous constituents that are reasonably expected to be in, or derived from, waste placed in a RCRA-regulated unit but may not be detected in the groundwater above the chemical of concern’s (COC) concentration limit.
- If applicable, “Appendix IX” can be used in Column A for a RCRA-regulated unit instead of listing each COC. The Permittee may petition the Executive Director for the deletion of a specific COC from the Appendix IX analysis if the Permittee can demonstrate that the COC was never used in the facility’s operations nor was disposed of in the unit.
- CP Table IV chemicals of concern (COCs) are to be monitored annually in accordance with Provision XLF.3.c(2)(b). Any CP Table IV COCs detected in the groundwater at a concentration greater than the COC’s concentration limit should be added to CP Table IVA through permit modification or amendment.

Footnotes:

- Use Column B to specify the concentration limit assigned at the point of compliance (POC).
- For each COC, include the appropriate concentration limit designation according to either the Risk Reduction Rules (RRR) pursuant to 30 TAC Chapter 335 or the Texas Risk Reduction Program (TRRP) pursuant to 30 TAC Chapter 350. The RRR and TRRP concentration limit designations and definitions may not be combined pursuant to 30 TAC Section 350.2(m).

RRR Concentration Limit Designations and Definitions

ND Non-detectable at the practical quantitation limit (PQL) as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987, edition of the Federal Register and later editions. The PQL is the lowest concentrations of analytes in groundwater that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating conditions.

BKG Background as determined in accordance with Provision XI.F.1.

TRRP Concentration Limit Designations and Definitions

ND Non-detectable at the method quantitation limit (MQL) as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987, edition of the Federal Register and later editions. The MQL is defined in 30 TAC Section 350.4(54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

BKG Background as determined in accordance with Provision XI.F.1.

CP Table IVA: Compliance Monitoring Program Table of Detected Hazardous Constituents and the Groundwater Protection Standard

Unit Name	Column A Hazardous Constituents	Column B Groundwater Protection Standards (mg/L) ^{1, 2}	
RESERVED			

Notes:

- If there are no RCRA-regulated units subject to the Compliance Monitoring Program pursuant to 30 TAC Section 335.165, delete the contents of the table and add "Reserved" to the first row of CP Table IVA.
- CP Table IVA represents the short list of hazardous constituents released from a RCRA-regulated unit which are detected in the groundwater above the concentration limits specified in CP Table IV, Column B.
- CP Table IVA chemicals of concern (COCs) are monitored in accordance with the frequency specified in CP Table VIII to verify the groundwater protection standards (GWPS) are met.

Footnotes:

- Use Column B to specify the GWPS assigned at the point of compliance (POC).
- For each COC, include the appropriate GWPS designation that applies to verify the Compliance Monitoring Program objectives are being achieved either under the Risk Reduction Rules (RRR) pursuant to 30 TAC Chapter 335 or the Texas Risk Reduction Program (TRRP) pursuant to 30 TAC Chapter 350. The RRR and TRRP GWPS designations and definitions may not be combined pursuant to 30 TAC Section 350.2(m).

ACL = alternative concentration limit; PCL = protective concentration level; RSA = Remedy Standard A; RSB = Remedy Standard B.

RRR GWPS Designations and Definitions

- MSC ACL pursuant to 30 TAC Section 335.160(b) based upon the Groundwater Medium-Specific Concentration, Residential (or Industrial) Risk Reduction Standard No. 2 (or No. 3) specified in 30 TAC Section 335 Subchapter S.
- MCL ACL pursuant to 30 TAC Section 335.160(b) based upon the Groundwater Maximum Contaminant Level specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subparts B and G.
- SMCL ACL pursuant to 30 TAC Section 335.160(b) based upon the Groundwater Secondary Maximum Contaminant Level specified in 40 CFR Part 143, National Secondary Drinking Water Regulations.
- AL ACL pursuant to 30 TAC Section 335.160(b) based upon the Action Level (AL) specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subpart I.
- BKG Background as determined in accordance with Provision XLF.1.
- ND Non-detectable at the practical quantitation limit (PQL) as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987, edition of the Federal Register and later editions. The PQL is the lowest concentrations of analytes in groundwater that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating conditions.

TRRP GWPS Designations and Definitions

- ^{GW}GW_{Ing} ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater ingestion PCL determined under RSA or RSB (Residential or Commercial/Industrial) for Class 1 or Class 2 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table. In accordance with 30 TAC Section 350.72(b), ^{GW}GW_{Ing}, PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to 1x10E-4) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 noncarcinogenic chemicals of concern within a source medium.
- ^{GW}GW_{Class3} ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater PCL determined under RSA or RSB (Residential or Commercial/Industrial) for Class 3 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
- ^{Air}GW_{Inh-V} ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the inhalation of volatiles from groundwater PCL determined under RSA or RSB (Residential or Commercial/Industrial) for Class 1, 2, or 3 groundwater. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
- ^{SW}GW ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is

based upon the groundwater-to-surface water PCL determined under RSA or RSB (Residential or Commercial/Industrial). The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

^{SED}GW ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater-to-sediment PCL determined under RSA or RSB (Residential or Commercial/Industrial). The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

^{ECO}GW ACL pursuant to 30 TAC Section 335.160(b) and 30 TAC Chapter 350 which is based upon the groundwater PCL protective of ecological receptor(s) determined under RSA or RSB. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

BKG Background as determined in accordance with Provision XI.F.1.

ND Non-detectable at the method quantitation limit (MQL) as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987, edition of the Federal Register and later editions. The MQL is defined in 30 TAC Section 350.4(54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

CP Table V: Designation of Wells

Add "Reserved" in the "Unit Name" column if a table is not applicable. Delete all text in italics.

Point of Compliance (POC) Wells

Unit Name	Well Numbers
Historic spillage area	MW-1, MW-2, MW-3 and MW-4.

Point of Exposure (POE) Wells

Unit Name	Well Numbers
Historic spillage area	MW-6 and RW-2 (not to be sampled unless groundwater treatment system restarted), MW-9, and MW-10.

Alternate Point of Exposure (APOE) Wells

Unit Name	Well Numbers
None	None

Background Wells

Unit Name	Well Numbers
Historic spillage area	MW-7

FOA Boundary of Compliance (FBOC) Wells

Unit Name	Exposure Pathway	Well Numbers
N/A	None	None

Note:

Attenuation monitoring point (AMP) wells, corrective action system (CAS) wells, and corrective action observation (CAO) wells required by Permit Section XI.B.2. should not be listed in CP Table V. These wells should only be depicted in the CP Attachment A maps. Once an AMP, CAS, or CAO well meets its respective attenuation action levels (AALs) or GWPS, then the Permittee may propose to discontinue monitoring that well without modification to the Permit. If the AMP, CAS, or CAO well is listed in CP Table V, then any proposed change to the well

would require modification to the Permit. Changes to the wells depicted in the CP Attachment A maps can be approved in the Groundwater Monitoring Report required by Provision XI.G.3. and CP Table VII and become a part of the Permit by reference.

CP Table VI: Compliance Period and Post Closure Period for RCRA-Regulated Units

[Historic Spillage Area: NOR #005]	Year or Number of Years
Year Waste Management Activities Initiated	1993
Year Closed	2009
Compliance Period	16
Compliance Period Begin Date	1993
Compliance Period End Date	2009
Post Closure Care Period	30
Post Closure Care Period Begin Date	2009
Post Closure Care Period End Date	2039

Note:

If there are no RCRA-regulated units listed in CP Table I that are subject to Corrective Action or Compliance Monitoring, mark "Reserved" in the first editable row of the table and then delete the remainder of the contents in the table.

Delete all text in italics upon completing this table.

CP Table VII: Reporting Requirements

Item	Program	Reporting Frequency	Requirements
1.	All programs	Annually by January 21st	Each report shall be certified by a qualified engineer and/or geoscientist.
2.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	A table of all modifications and amendments made to this Compliance Plan with their corresponding approval dates by the Executive Director (or the Commission) and a brief description of each action;
3.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	A summary of any activity and/or response actions implemented since the last reporting period within an area subject to an institutional control.
4.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Tabulation of well casing elevations in accordance with CP Attachment C;
5.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Provide a certified well installation diagram for any new monitoring well installed or replaced during the reporting period. Provide the certification for all wells plugged and abandoned during the reporting period;
6.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Recommendation for any changes to the program;
7.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Any other items requested by the Executive Director;

Item	Program	Reporting Frequency	Requirements
8.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Prepare water table maps from the groundwater data collected pursuant to Permit Section XI. F. and reported in accordance with Provision <u>XI.G.3.</u> The Permittee shall also include in the report an evaluation of the following parameters: a. Development and maintenance of a cone of depression during operation of the groundwater recovery system(s), if applicable; b. Direction and gradient of groundwater flow; c. Effectiveness of hydrodynamic control of the contaminated groundwater zone during operation of the groundwater recovery system(s), if applicable; and d. Estimation of the rate and direction of groundwater contamination migration.
9.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	The Permittee shall submit the groundwater monitoring report required by Provision <u>XI.G.3.</u> to each recipient listed in <u>Provision XI.I.3.</u> The report must include all applicable information listed in this table (CP Table VII: Reporting Requirements) for the reporting period. If both Corrective Action and Compliance Monitoring Programs are authorized, then the report shall contain the applicable information required for both programs.
10.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Discuss the Corrective Action System(s) authorized under <u>Provision XI.B.3.</u> that was in operation during the reporting period. Provide a narrative summary of the evaluations made for each system for the preceding reporting period in accordance with Permit Sections <u>XI.E.</u>, <u>XI.F.</u>, and <u>XI.G.</u> The reporting periods shall be January 1st through June 30th and July 1st through December 31st for the Corrective Action Program, unless an alternative schedule is approved by the Commission. The reporting period for the Compliance Monitoring Program shall be based on the calendar year.
11.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Discuss the method(s) used to manage recovered/purged groundwater in accordance with <u>Provision XI.B.8.</u> The Permittee shall maintain this information as part of the facility's operating record and make it available for inspection upon request.

Item	Program	Reporting Frequency	Requirements
12.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Provide an updated table and map of all monitoring and corrective action system wells. The wells to be sampled shall be those wells proposed in the Compliance Plan Application referenced in Provision I.B. and any changes subsequently approved by the Executive Director pursuant to Provisions <u>XI.B.2.</u> and <u>XI.B.3.</u> Provide in chronological order a list of those wells which have been added to, or deleted from, the groundwater monitoring program and remediation systems since original issuance of the Compliance Plan. Include the date of the Commission's approval for each well;
13.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Provide the results of the chemical analyses, submitted in a tabulated format acceptable to the Executive Director, which clearly indicates each chemical of concern (COC) that exceeds the Groundwater Protection Standard (GWPS) or Concentration Limit. Copies of the original laboratory report(s) which contain the appropriate quality control and quality assurance data and the detection limit for each COC shall be provided if requested by the Executive Director;
14.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Tabulation of all water level elevations, depth to water measurements, and total depth of well measurements collected since the previous groundwater monitoring report was submitted as required by <u>Provisions XI.F.3.d.(1) and XI.F.3.d.(4).</u> Also include in the table an evaluation of the silt accumulated in each well and clearly indicate the wells which require corrective action for silt accumulation as required by <u>Provision XI.F.3.d.(4).;</u>
15.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Provide potentiometric surface maps showing the elevation of the water table at the time of sampling, delineation of the radius of influence of the Corrective Action System, and the direction of groundwater flow gradients outside any radius of influence;
16.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Tabulation of all data evaluation results pursuant to <u>Provision XI.F.4.</u> Include the compliance status of each well regarding the Corrective Action objectives, GWPS, and/or Concentration Limits;

Item	Program	Reporting Frequency	Requirements
17.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Provide an updated summary as required by CP Table VIII;
18.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Provide a summary of any changes made to the groundwater monitoring program and/or Corrective Action Program. Include a summary of well inspections, repairs, and any operational difficulties;
19.	Corrective Action and/or Compliance Monitoring	Annually by January 21st	Include a notation of the presence or absence of light and/or dense non-aqueous phase liquids (NAPLs) in each well during each sampling event. Provide a tabulation of the depth and thickness of the NAPL, if detected, for each well;
20.	Corrective Action only	Annually by January 21st	Provide quarterly tabulations of the quantities of recovered groundwater and NAPLs, and graphs of monthly recorded flow rates versus time for the corrective action recovery wells in operation during the reporting period. Also provide a narrative summary which describes and evaluates the NAPL recovery program;
21.	Corrective Action only	Annually by January 21st	Tabulation of the total contaminant mass recovered from each groundwater recovery system in operation during the reporting period;
22.	Corrective Action only	Annually by January 21st	Provide maps of the area(s) where GWPSs are exceeded. Depict the concentrations of CP Table IIIA COCs, and any newly detected CP Table III COCs, as isopleth contours or discrete concentrations if isopleth contours cannot be inferred. Clearly delineate the area(s) where concentrations of COCs exceed the GWPS. Depict the boundary of the plume management zone (PMZ), if applicable;
23.	Corrective Action only	Annually by January 21st	Provide maps and tables which include the extent and thickness of detected light and/or dense NAPLs;

Item	Program	Reporting Frequency	Requirements
24.	Corrective Action only	Annually by January 21st	Annually provide a Corrective Measures Implementation (CMI) Progress Report or Response Action Effectiveness Report (RAER) in accordance with <u>Provision XI.H.6</u>. The Permittee must also include a narrative summary of the status of the approved final corrective measures conducted in accordance with the approved CMI Workplan or Response Action Plan and must demonstrate that the requirements of <u>Provisions XI.H.6 and XI.H.7</u> are being met. The CMI Progress Report must include: a) A summary of the response actions taken since the last reporting period; b) An estimate of the percentage of the response action(s) which has been completed; c) An estimate in years of the additional time necessary to complete the response action(s); d) A determination whether sufficient progress is being made to complete the response actions within a reasonable timeframe; and e) Any other reasonable information required by the Executive Director. The RAER must include: f) The information required by Title 30 Texas Administrative Code (TAC) Section 350.93; or g) The Permittee may complete and submit the RAER Form (TCEQ Form 10327/RAER). The required CMI Progress Report/RAER may be submitted as a separate section in the groundwater monitoring report required by <u>Provisions XI.G.3</u>. Alternatively, the required elements of the CMI Progress Report/RAER may be incorporated within the groundwater monitoring report, but each requirement must be clearly identified within the groundwater monitoring report.

Item	Program	Reporting Frequency	Requirements
25.	Corrective Action only	Annually by January 21st	The Permittee must include a narrative summary of the status of each Solid Waste Management Unit (SWMU) and/or Area of Concern (AOC) subject to the requirements of Permit Section XI.H. The Permittee must also discuss the Interim Corrective Measures (ICM) Program for each applicable SWMU and/or AOC and document that the objectives of Provision <u>XL.H.8.b.</u> are being achieved.
26.	PMZ	Not Applicable	Provide a summary evaluating the effectiveness of the Corrective Action system in controlling migration beyond the downgradient boundary and vertical limit of the PMZ to achieve the GWPS. The summary shall include an evaluation of whether the attenuation action levels are exceeded at their respective attenuation monitoring points pursuant to 30 TAC Sections 350.33(f)(4)(A) and 350.33(f)(4)(D)(ii);
27.	PMZ	Not Applicable	Provide an estimate of the percentage of the response action which has been completed within the PMZ;
28.	PMZ	Not Applicable	Include an estimate in years of the additional time necessary to complete the response actions for the PMZ;
29.	PMZ	Not Applicable	Provide a determination whether sufficient progress is being made to achieve the selected remedy standard within a reasonable time frame given the circumstance of the affected property within the PMZ.
30.	Facility Operations Area (FOA) only	Not Applicable	Provide additional reporting requirements to fulfill the requirements of 30 TAC Section 350.134 and 30 TAC Section 350.135. These requirements include, but are not limited to: a. Provide an average of both lost workday injury case rates and injury incidence rates for the most recent three (3) year period compared to the most recent specific industry national average published by the Bureau of Labor Statistics; b. Document that the worker health and safety program meet the requirements of the Occupational Safety and Health Administration (OSHA) by providing records of the OSHA compliance history or the results of the most recent audit of the health and safety programs by the OSHA or a third party certified professional

Item	Program	Reporting Frequency	Requirements
			industrial hygienist and safety specialist. An audit is required anytime there is a significant change to the health and safety program, or at a minimum every three (3) years, the results of which indicate the program is satisfactory; c. Document a compliance history ranking of average or better for the TCEQ; d. Document the pollution prevention program that has a goal of prevention of releases of COCs to environmental media within the FOA; e. Provide a statement that the program required in 30 TAC Section 350.134(a)(7) to protect workers within the FOA from environmental media having concentrations of COCs greater than protective concentration levels (PCLs) or action levels based on the health and safety program is still in effect. In addition, the Permittee shall provide, for the preceding year, an updated map delineating areas where the Soil Response Action Plan has been implemented pursuant to 30 TAC Section 350.135(a)(5); f. Document there have not been any significant outstanding non-compliance issues resulting from inspections for compliance with the RCRA permit or Order, if any; g. Document areas of ecological impact identified within the FOA and procedures for responding to these identified ecologically impacted areas on a continual basis. Review any ecologically impacted areas annually and report any new ecological impacts within thirty (30) days of verification of impact; h. Document activity associated with tracking and responding to releases to soil and groundwater above reportable quantities, which occur within the FOA after the issuance of the Compliance Plan, in accordance with 30 TAC Section 350.135(a)(7); i. Document any NAPL occurrences and any procedure(s) used to address known NAPLs and any NAPLs identified during the operational life of the FOA. This should

Item	Program	Reporting Frequency	Requirements
			include any previously discovered NAPL occurrences; and j. Provide documentation that access is restricted to the FOA.

CP Table VIII: Compliance Schedule

Item	Compliance Schedule (from the date of issuance of the Compliance Plan unless otherwise specified)	Regulatory Citation	Requirement
A.	60 days	Compliance Plan	Submit to the Executive Director a schedule summarizing all activities required by the Compliance Plan. The schedule shall list the starting dates of all routine activities. The permittee shall include an updated schedule in the groundwater monitoring report required by <u>Provision XI.G.3.</u> and CP Table VII. The schedule shall list the activity or report, the Compliance Plan Section which requires the activity or report, and the calendar date the activity or report is to be completed or submitted (if this date can be determined.)
B.	Requirement completed on April 24, 2026	30 TAC §335.163(4) and Provision XI.F.2.	Submit to the Executive Director for review and approval a Sampling & Analysis Plan (SAP) unless the SAP has been submitted with the application and referenced in <u>Provision I.B.</u>
C.	During the first thirty (30) days of each second and fourth quarter	30 TAC §335.166	Corrective Action monitoring shall be conducted on a semiannual basis for the RCRA-regulated units listed in CP Table I.A. which are subject to the Corrective Action Program.
D.	Not Applicable	30 TAC §335.165	Compliance Monitoring shall be conducted on <u>Choose an item.</u> basis for the RCRA-regulated units listed in CP Table I.B. which are subject to the Compliance Monitoring Program.
E.	During the first thirty (30) days of each second and fourth quarter	30 TAC §335.167	Corrective Action monitoring shall be conducted on a semiannual basis for the solid waste management units (SWMUs) and/or areas of concern (AOCs) listed in CP Table I.C. which are subject to the Corrective Action Program.

Item	Compliance Schedule (from the date of issuance of the Compliance Plan unless otherwise specified)	Regulatory Citation	Requirement
F.	Not Applicable	30 TAC §335.151	Alternative Corrective Action monitoring shall be conducted on Choose an item. basis for the RCRA-regulated units, SWMUs, and/or AOCs listed in CP Table I.D. which are subject to the Corrective Action Program.
G.	Not Applicable	30 TAC Section 335.156 and Chapter 350	FOA Corrective Action monitoring shall be conducted on Choose an item. basis for the RCRA-regulated units, SWMUs, and/or AOCs listed in CP Table I.E., which are located within the FOA Boundary and are subject to the Corrective Action Program.
H.	Not Applicable	30 TAC §350.31(g) and §350.33(f) (4)(C)(i)	If a plume management zone (PMZ) has been authorized, submit to the Executive Director proof of compliance with the institutional control requirements which provides notice of the existence and location of the PMZ and which prevents exposure to groundwater from this zone until such a time when the concentrations of the chemicals of concern are less than the groundwater protection standards (GWPS) listed on CP Table III.
I.	Not Applicable	30 TAC §350.33(k)	If a PMZ has been authorized, after an unexpected event occurs which indicates that additional response actions will be required at an affected property.

Notes:

1. Please note that Corrective Action monitoring is conducted on semiannual basis unless a less frequent monitoring schedule is approved based on plume stability and achievement of Corrective Action objectives.

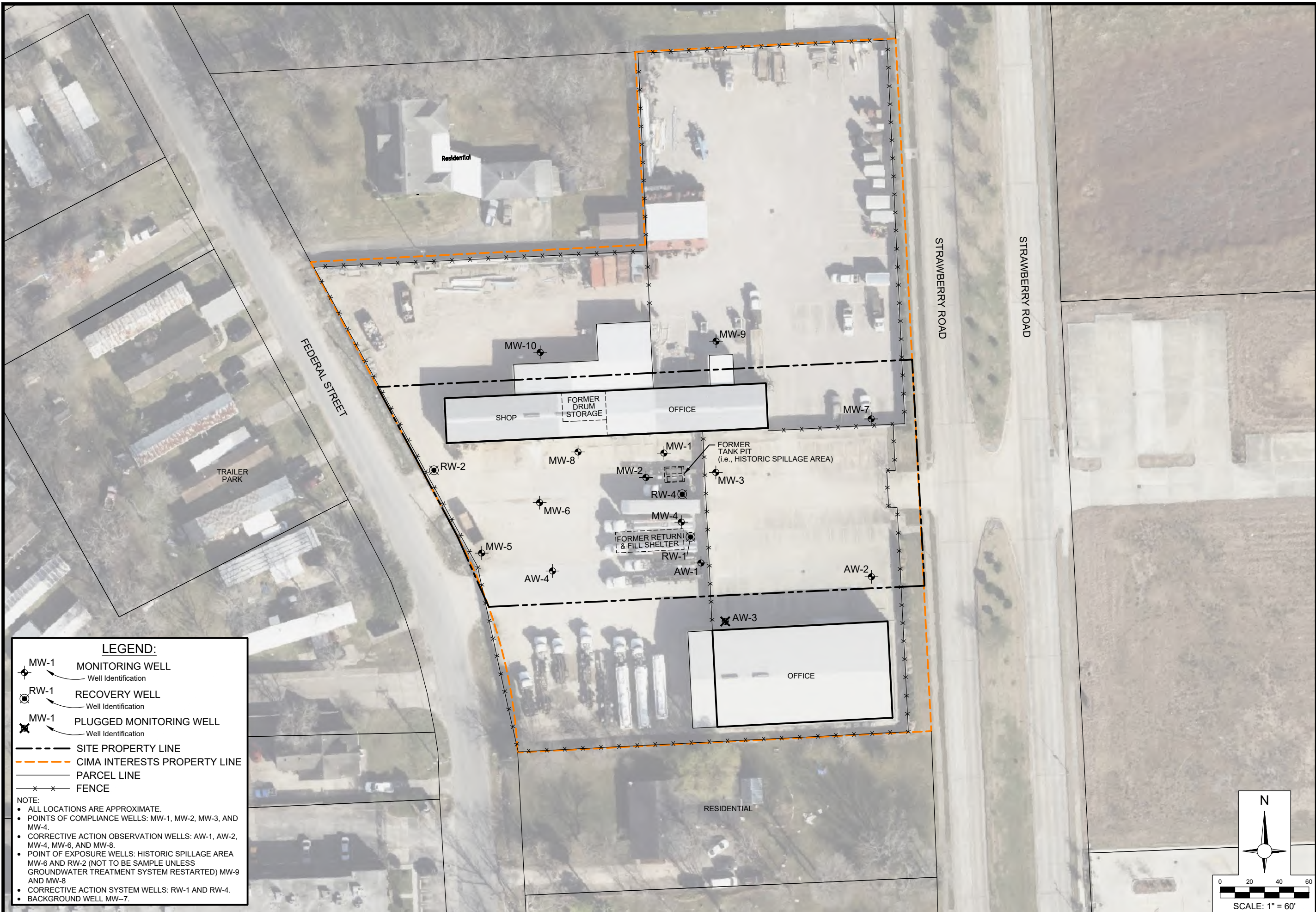
CP Table IX: Description of Uppermost Aquifer

The term "Uppermost Aquifer" as referenced in this Compliance Plan refers to the **Groundwater is typically encountered approximately 15 feet below grade 15 feet below Mean Sea Level in the uppermost aquifer. The uppermost aquifer is part of the Beaumont Formation and consists of clays, sand, silts and gravels ranging in thickness from 0 to 100 feet. Groundwater flow is generally toward the southwest.**

CP Attachment A

Figures

C:\USERS\DAVID HUGHES\ONEATLAS\DIGITAL SERVICES - FILE SERVER\2026\CAD DEPARTMENT\SAFETY KLEEN\PASADENA, TX\SKL0003-SITE DWG, FIG1



SITE MAP
SAFETY-KLEEN
3333 FEDERAL ROAD
PASADENA, TEXAS 77504

Project Number:
SKL0003

Date:
04/21/2026

Drn. By:
DH

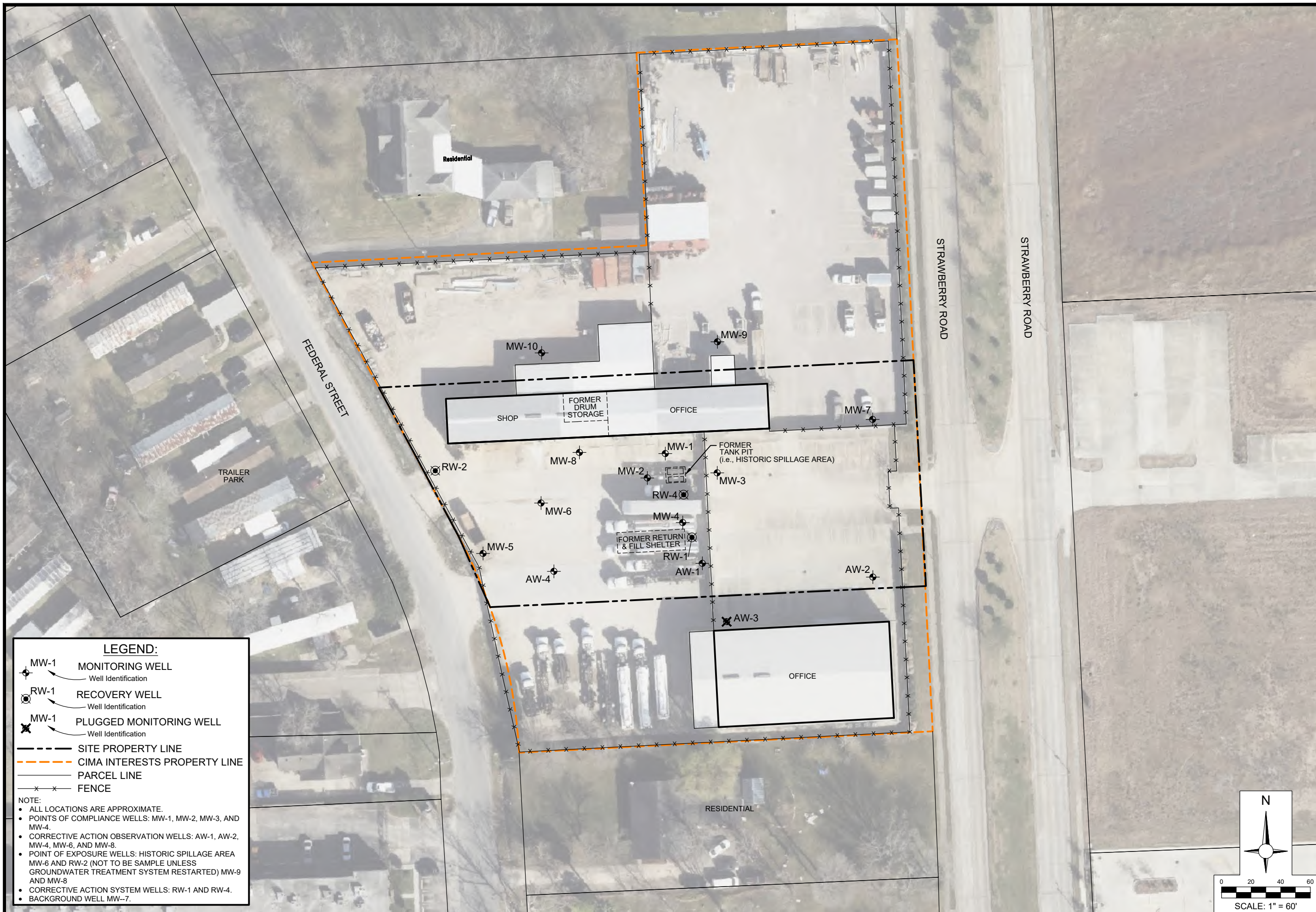
Ckd. By:
CY

Scale:
AS SHOWN

Figure:

1

C:\USERS\DAVID HUGHES\ONEATLAS\DIGITAL SERVICES - FILE SERVER\2026\CAD DEPARTMENT\SAFETY KLEEN\PASADENA, TX\SKL0003-SITE DWG, FIG2



SWMU LOCATION MAP
SAFETY-KLEEN
3333 FEDERAL ROAD
PASADENA, TEXAS 77504

Project Number:
SKL0003

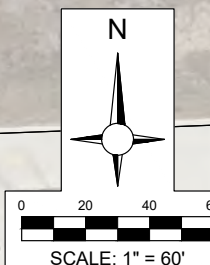
Date:
04/21/2026

Drn. By: DH Ckd. By: CY

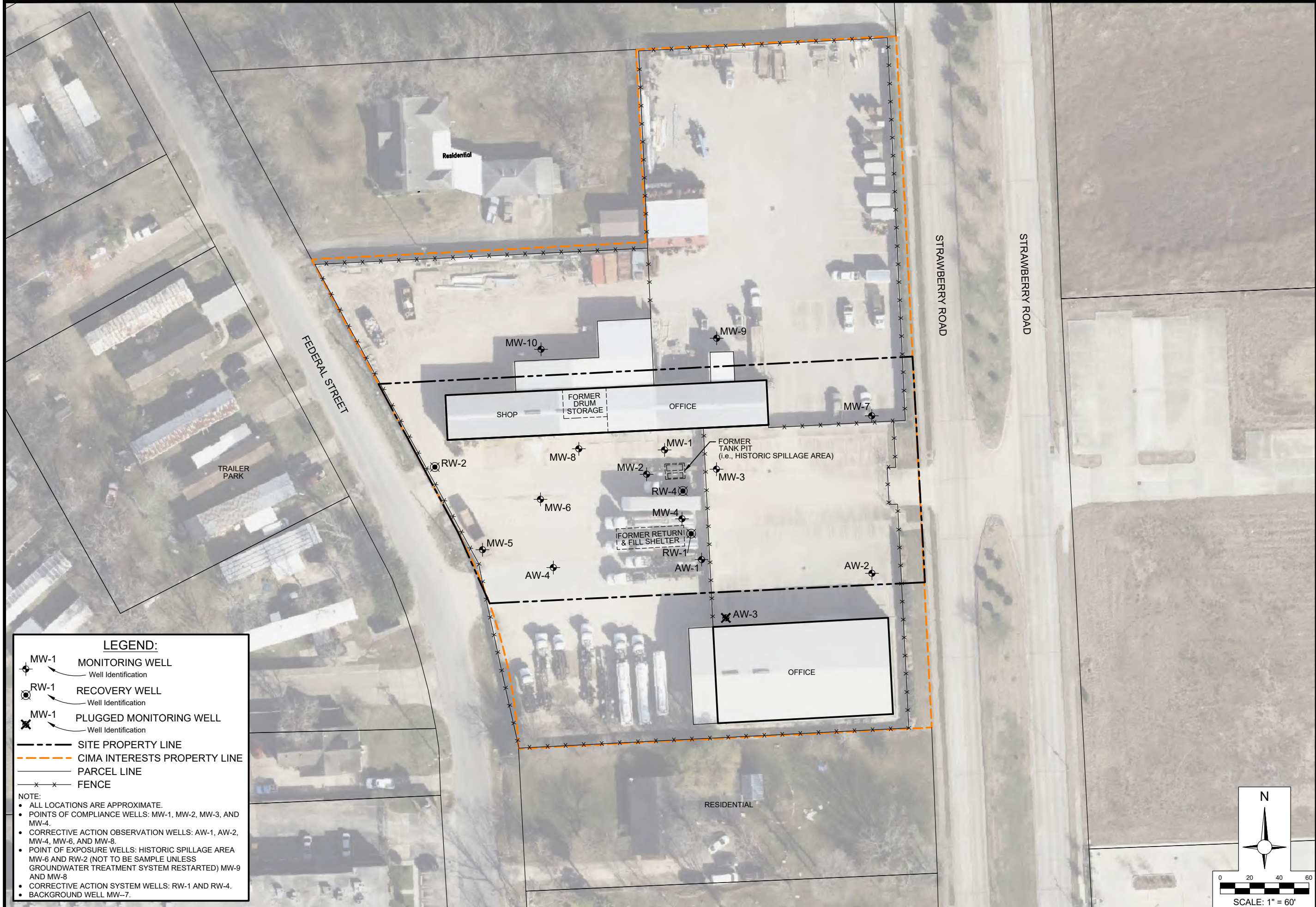
Scale:
AS SHOWN

Figure:

2



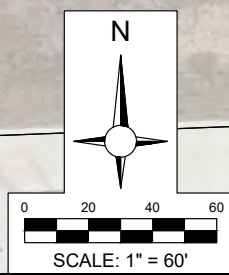
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WELL LOCATION MAP
SAFETY-KLEEN
3333 FEDERAL ROAD
PASADENA, TEXAS 77504

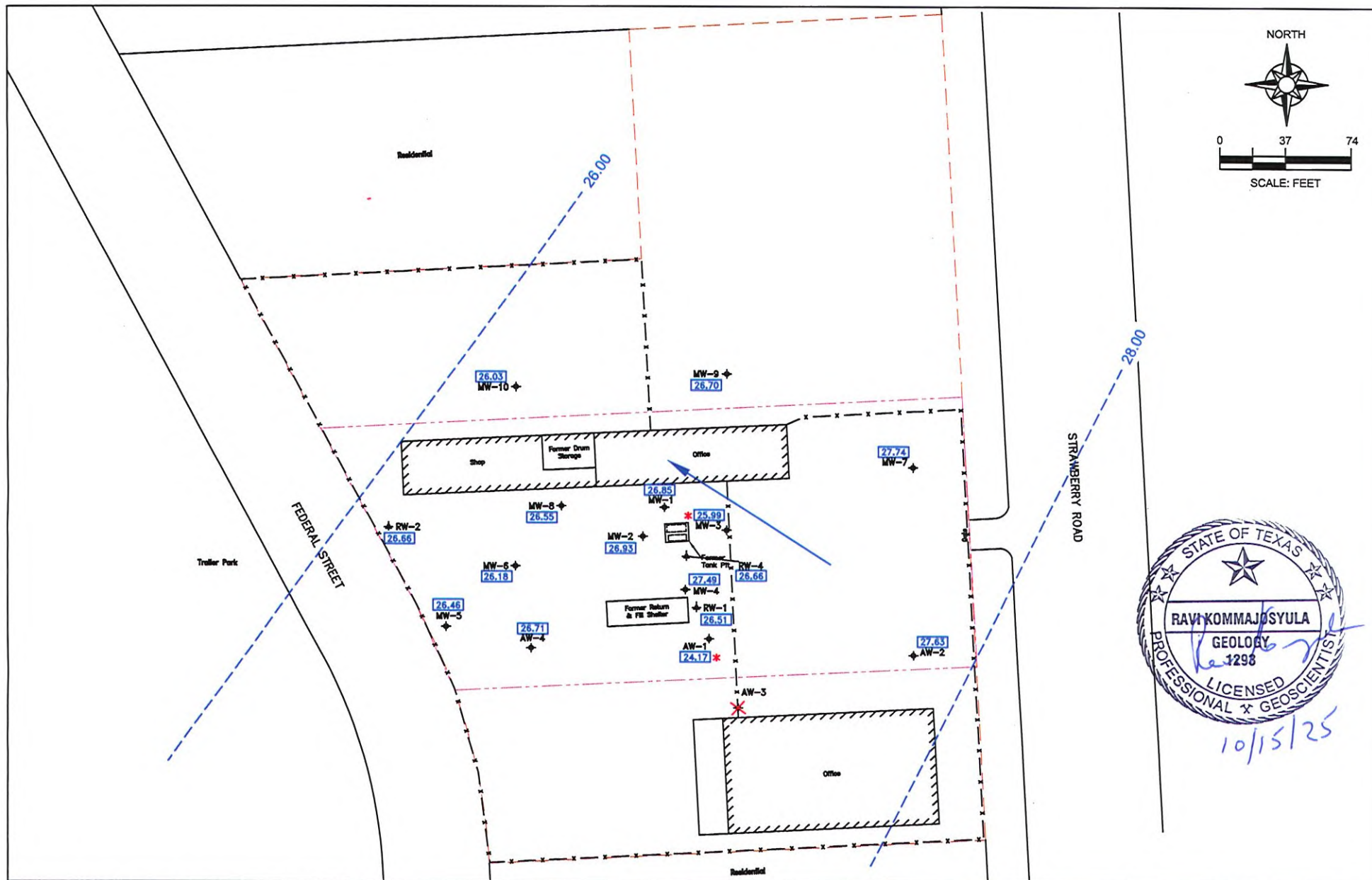
Project Number: SKL0003	
Date: 04/21/2026	
Drn. By: DH	Ckd. By: CY
Scale: AS SHOWN	
Figure:	

3



CP Attachment B

**Site Geology, Hydrogeology Conditions, and
Relationship to Surface Water**



POTENTIOMETRIC SURFACE MAP **6/18/2025**

Safety-Kleen
3333 Federal Road
Pasadena, Texas 77504

LEGEND

- x --- Fence Line
- Safety-Kleen Property Line
- CIMIA Interests Property Line
- 22.76 Ground Water Elevation, ft.
- 23.00 Ground Water Elevation Contour, ft.
- Inferred Groundwater Elevation Contour
- Apparent Ground Water Flow Direction
- AW-2 Monitor Well (Off Site)
- AW-3 Plugged Monitor Well
- RW-1 Recovery Well
- MW-6 Monitor Well (On Site)
- AW-1, MW-3 Not Included in Contour Calculations

PROJECT NUMBER:
Z73SKCH006

FIGURE
2

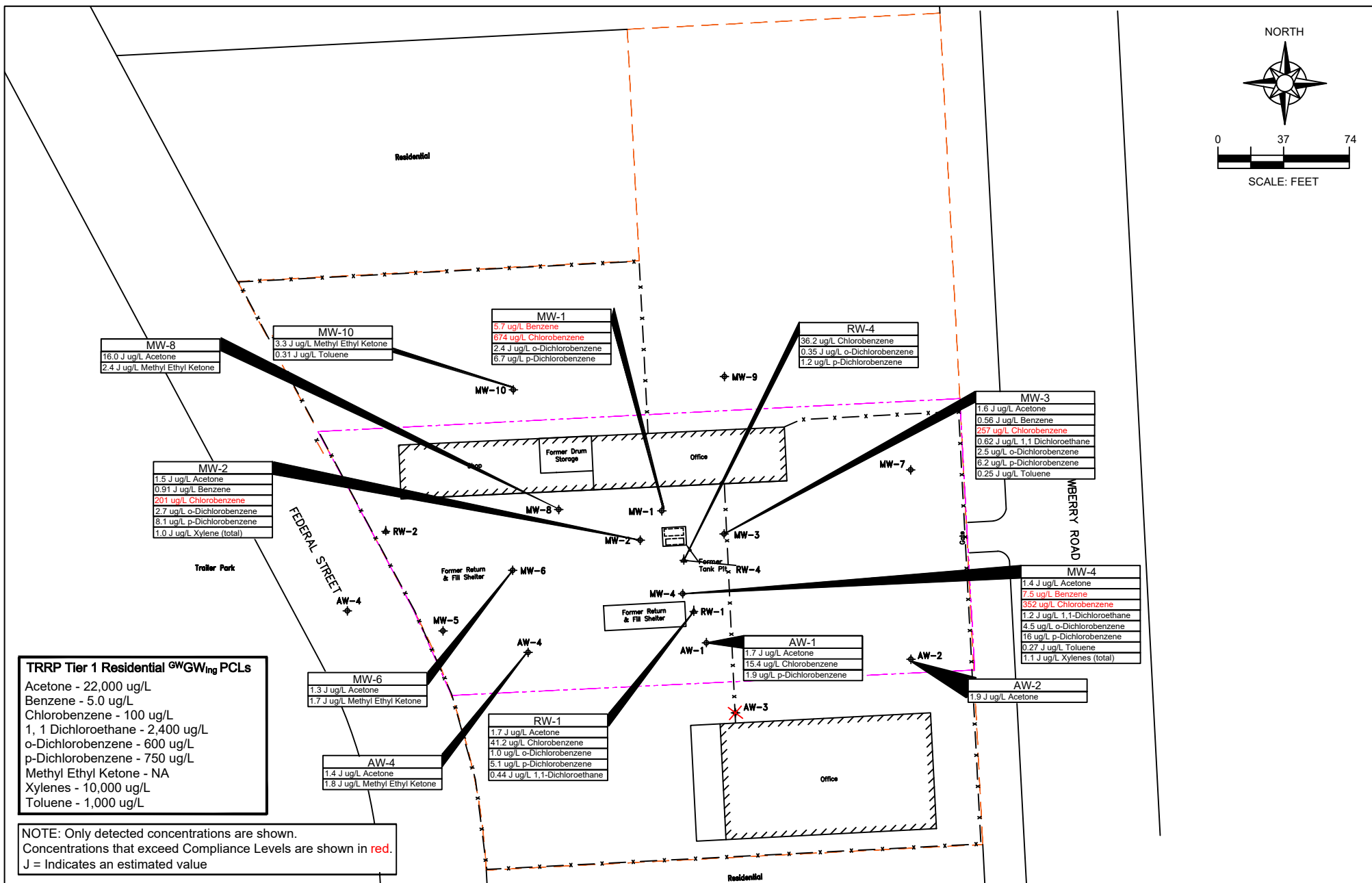
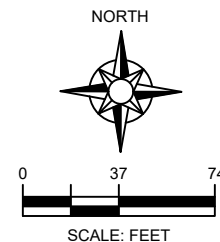
CHECKED
BY: JA

SCALE:
SEE ABOVE

DRAWN BY: AG 8/26/25

DRAWING FILE: S:\Admin\CAD - Out of Town Files\Houston\Safety Kleen\Pasadena

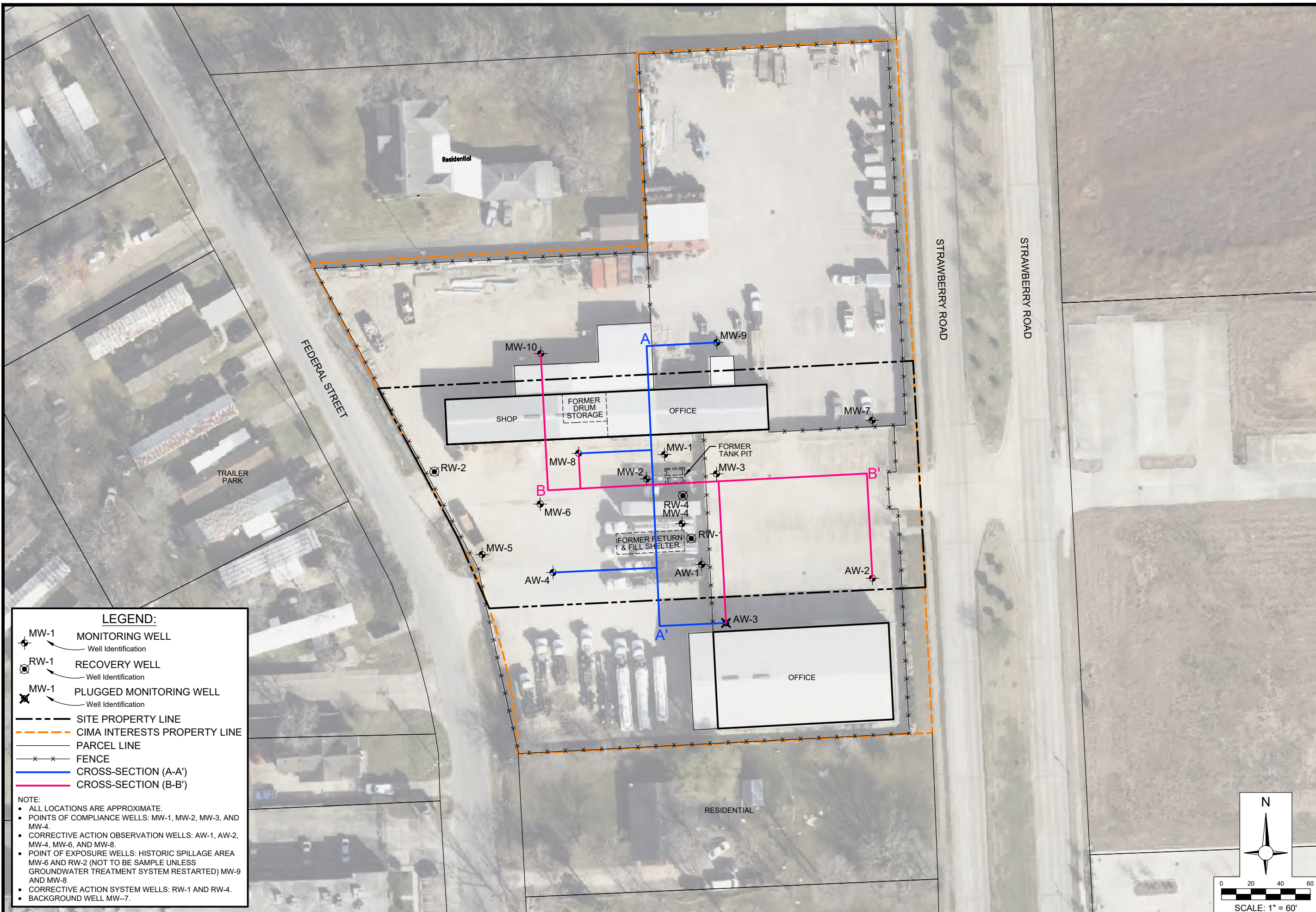
ATLAS



CHEMICALS OF CONCERN CONCENTRATION MAP **Sampling Date: 06/18-19/25**

Safety-Kleen
3333 Federal Road
Pasadena, Texas 77504

C:\USERS\DAVID.HUGHES\ONEATLAS\DIGITAL SERVICES - FILE SERVER\2026\CAD DEPARTMENT\SAFETY KLEEN\PASADENA, TX\SKL0003-XSEC.DWG, FIG1



LEGEND:

- MW-1 MONITORING WELL
Well Identification
- RW-1 RECOVERY WELL
Well Identification
- MW-1 PLUGGED MONITORING WELL
Well Identification
- SITE PROPERTY LINE
- CIMA INTERESTS PROPERTY LINE
- PARCEL LINE
- FENCE
- CROSS-SECTION (A-A')
- CROSS-SECTION (B-B')

- NOTE:
- ALL LOCATIONS ARE APPROXIMATE.
 - POINTS OF COMPLIANCE WELLS: MW-1, MW-2, MW-3, AND MW-4.
 - CORRECTIVE ACTION OBSERVATION WELLS: AW-1, AW-2, MW-4, MW-6, AND MW-8.
 - POINT OF EXPOSURE WELLS: HISTORIC SPILLAGE AREA MW-6 AND RW-2 (NOT TO BE SAMPLE UNLESS GROUNDWATER TREATMENT SYSTEM RESTARTED) MW-9 AND MW-8.
 - CORRECTIVE ACTION SYSTEM WELLS: RW-1 AND RW-4.
 - BACKGROUND WELL MW-7.



SITE MAP WITH CROSS-SECTION TRACE

SAFETY-KLEEN
3333 FEDERAL ROAD
PASADENA, TEXAS 77504

Project Number:
SKL0003

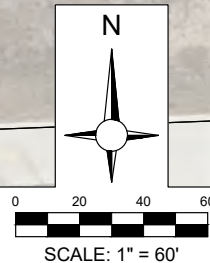
Date:
04/21/2026

Drn. By:
DH

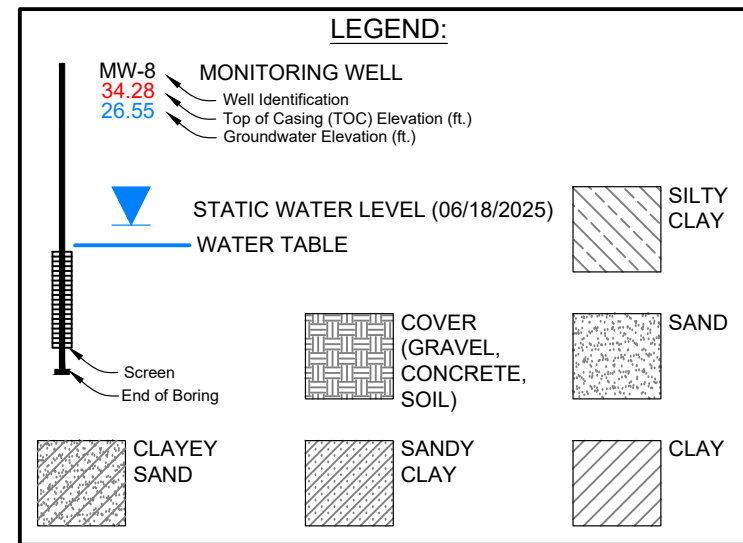
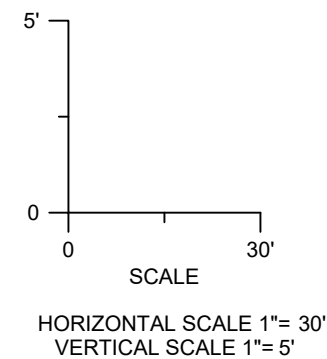
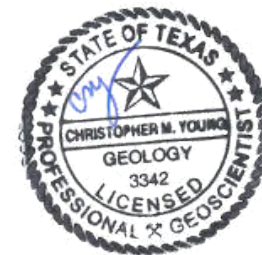
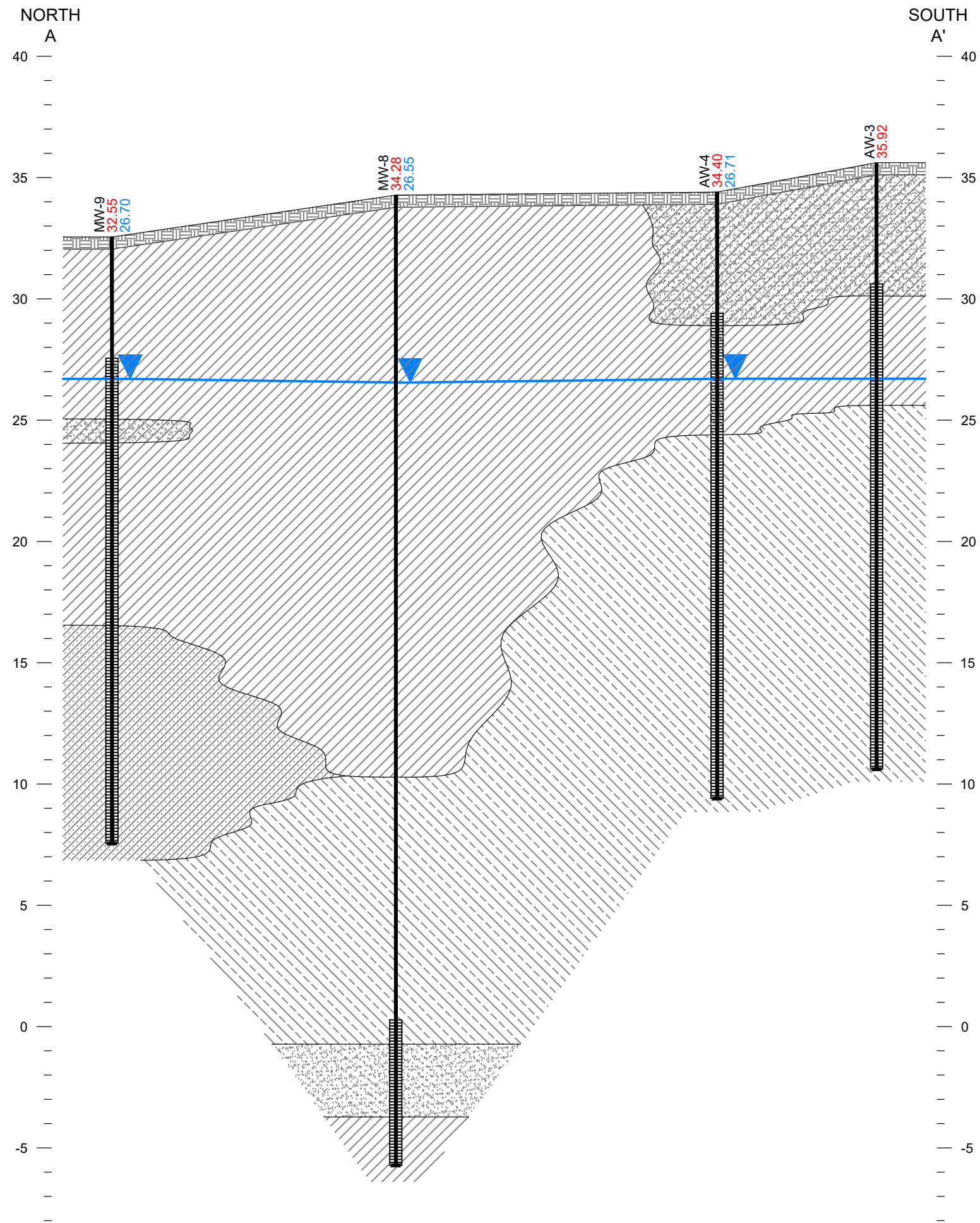
Ckd. By:
CY

Scale:
AS SHOWN

Figure:
1



C:\USERS\DAVID.HUGHES\ONEATLAS\DIGITAL SERVICES - FILE SERVER\2026\CAD DEPARTMENT\SAFETY KLEEN\PASADENA, TX\SKL0003-XSEC.DWG, FIG2A



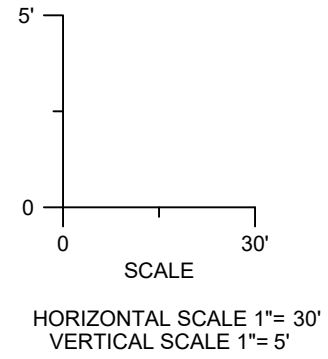
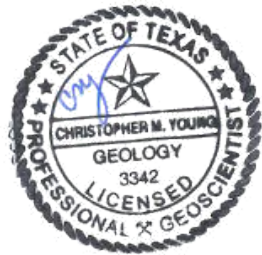
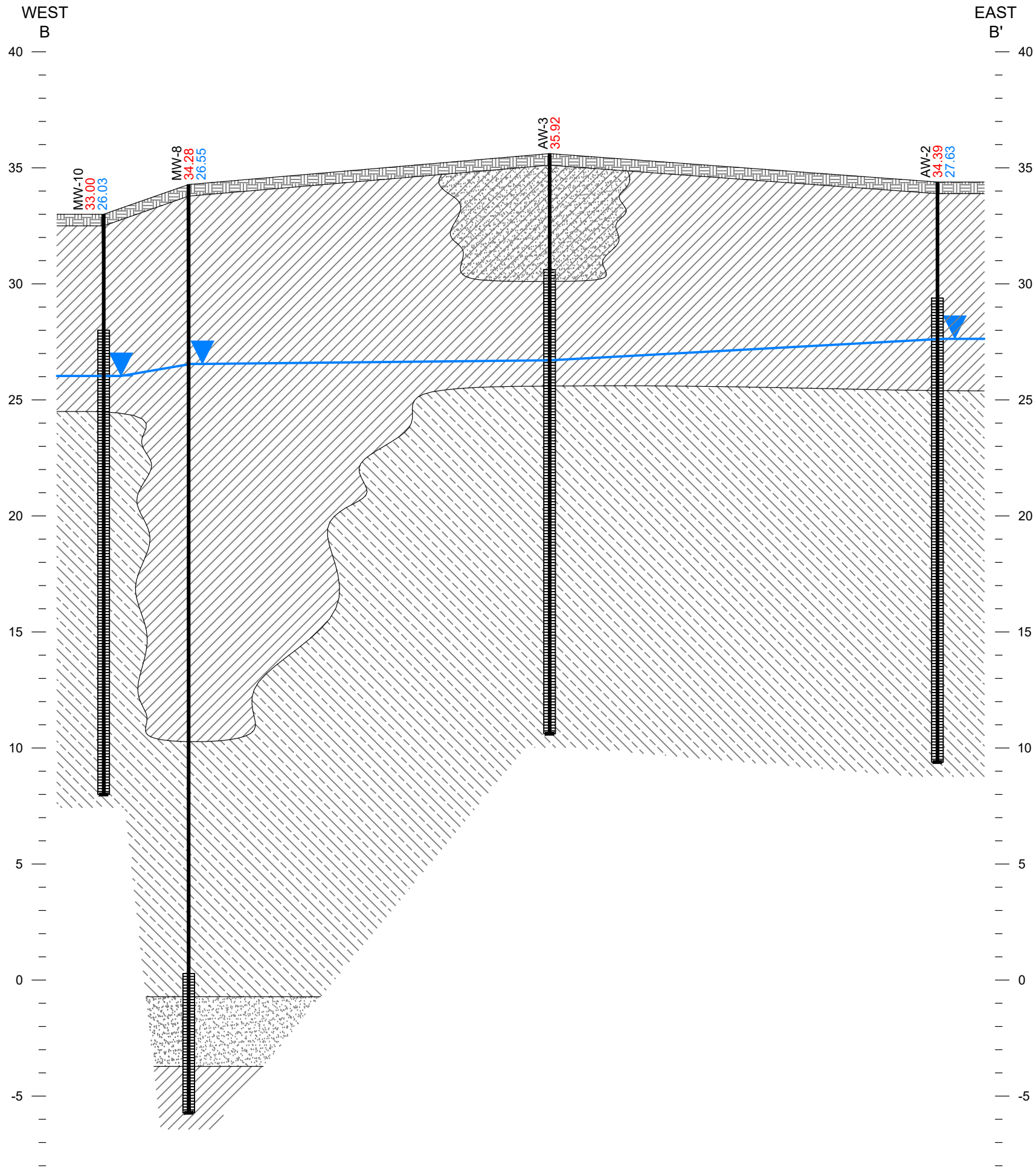
CROSS-SECTION A-A'

SAFETY-KLEEN
3333 FEDERAL ROAD
PASADENA, TEXAS 77504

Project Number: SKL0003	
Date: 04/09/2026	
Dwn. By: DH	Ckd. By: CY
Scale: AS SHOWN	
Figure: 2A	

ATLAS

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LEGEND:

MW-8
34.28
26.55

MONITORING WELL

Well Identification

Top of Casing (TOC) Elevation (ft.)

Groundwater Elevation (ft.)

STATIC WATER LEVEL (06/18/2025)

WATER TABLE

Screen

End of Boring

CLAYEY SAND

SANDY CLAY

CLAY

SILTY CLAY

SAND

COVER (GRAVEL, CONCRETE, SOIL)



CROSS-SECTION B-B'
SAFETY-KLEEN
3333 FEDERAL ROAD
PASADENA, TEXAS 77504

Project Number: SKL0003	
Date: 04/09/2026	
Dwn. By: DH	Ckd. By: CY
Scale: AS SHOWN	
Figure: 2B	

Attention Owner:
Confidentiality Privilege Notice
on reverse side of owner's copy.

Texas Department of License and Regulation
Water Well Driller/Pump Installer Program
P.O. Box 12157 Austin, Texas 78711 (512) 463-7880 FAX (512) 463-8616
Toll free (800) 803-9202
Email address: water.well@license.state.tx.us

This form must be completed
and filed with the department
and owner within 60 days
upon completion of the well.

WELL REPORT

1) OWNER

A. WELL IDENTIFICATION AND LOCATION DATA

Name Safety - Kleen Systems	Address 4800 S. Old Peach Tree Rd.	City Norcross	State GA	Zip 30071
---------------------------------------	--	-------------------------	--------------------	---------------------

2) WELL LOCATION AW-2

County Harris	Physical Address 3333 Federal Road	City Pasadena	State TX	Zip 77504
-------------------------	--	-------------------------	--------------------	---------------------

3) Type of Work

☒ New Well ☐ Deepening
☐ Reconditioning

Lat. **29 39 26N** Long. **95 11 35W** Grid # **65-23-8**

4) Proposed Use (check) ☒ Monitor ☐ Environmental Soil Boring ☐ Domestic
☐ Industrial ☐ Irrigation ☐ Injection ☐ Public Supply ☐ De-watering ☐ Testwell
If Public Supply well, were plans submitted to the TNRCC? ☐ Yes ☐ No

5) N↑

6) Drilling Date

Started **6/7/2004**

Completed **6/7/2004**

Diameter of Hole

Dia. (in)	From (ft)	To (ft)
11	0	25

7) Drilling Method (check) ☐ Driven

☐ Air Rotary ☐ Mud Rotary ☒ Bored
☐ Air Hammer ☐ Cable Tool ☐ Jetted
☐ Other _____

From (ft)	To (ft)	Description and color of formation material
0	.05	concrete
.05	1	clay dark gray
1	6	clay dk gray - silty
6	9	clay green/gray
9	19	clay yellow/red silty
19	24	clay brn silty
24	25	silt clayey brn

8) Borehole Completion ☐ Open Hole ☐ Straight Wall
☐ Under-reamed ☒ Gravel Packed ☐ Other _____
If Gravel Packed give the interval from **3** ft. to **25** ft.

Casing, Blank Pipe, and Well Screen Data

Dia. (in.)	New Or Used	Steel, Plastic, etc. Perf., Slotted, etc. Screen Mfg., if commercial	Setting (ft)		Gage Casing Screen
			From	To	
4	N	pvc - LSWP	0	5	riser
4	N	pvc - LSWP	5	25	.010

9) Cementing Data

Cementing from **0** ft. to **2** ft. # of sacks used **1**
_____ ft. to _____ ft. # of sacks used _____

Method Used **pump & tremmie**

Cementing By **driller**

Distance to septic system field or other concentrated contamination _____ ft.

Method of verification of above distance _____

(Use reverse side of Well Owner's copy, if necessary)

13) Plugged

☐ Well plugged within 48 hours

Casing left in well:

Cement/Bentonite placed in well:

From (ft)	To (ft)	From (ft)	To (ft)	Sacks used

14) Typepump

☐ Turbine ☐ Jet ☐ Submersible ☐ Cylinder
☐ Other _____

Depth to pump bowls, cylinder, jet, etc., _____ ft.

15) Water Test

Typetest ☐ Pump ☐ Bailor ☐ Jetted ☐ Estimated

Yield: _____ gpm with _____ ft. drawdown after _____ hrs.

16) Water Quality

Did you knowingly penetrate any strata which contain undesirable constituents?

☐ Yes ☒ NO If yes, did you submit a REPORT OF UNDESIRABLE WATER?

Type of water **fresh** Depth of Strata **8**

Was a chemical analysis made? ☐ Yes ☒ No

10) Surface Completion

☒ Specified Surface Slab Installed
☐ Specified Surface Sleeve Installed
☐ Pitless Adapter Used
☐ Approved Alternative Procedure Used

11) Water Level

Static level _____ ft. below _____ Date _____

Artesian Flow _____ gpm. _____ Date _____

12) Packers

Type _____ Depth _____

Bentonite Seal

2-3

Company or Individual's Name (type or print) **Master Monitoring Services, Inc.**

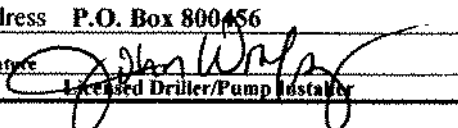
Lic. No. **3044 M**

Address **P.O. Box 800456**

City **Houston**

State **Tx**

Zip **77280-0456**

Signature 
Licensed Driller/Pump Installer

Date **7-1-04**

Signature _____

Apprentice

Date _____

Attention Owner:
Confidentiality Privilege Notice
on reverse side of owner's copy.

Texas Department of License and Regulation
Water Well Driller/Pump Installer Program
P.O. Box 12157 Austin, Texas 78711 (512) 463-7880 FAX (512) 463-8616
Toll free (800) 803-9202
Email address: water.well@license.state.tx.us

This form must be completed
and filed with the department
and owner within 60 days
upon completion of the well.

WELL REPORT

1) OWNER

A. WELL IDENTIFICATION AND LOCATION DATA

Name **Safety-Kleen Systems** Address **4800 S. Old Peach Tree Rd.** City **Norcross** State **GA** Zip **30071**

2) WELL LOCATION AW-3

County **Harris** Physical Address **3333 Federal Road** City **Pasadena** State **TX** Zip **77504**

3) Type of Work

☒ New Well ☐ Deepening
☐ Reconditioning

Lat. **29** **39** **26N** Long. **95** **11** **35W** Grid # **65-23-8**

4) Proposed Use (check) ☒ Monitor ☐ Environmental Soil Boring ☐ Domestic
☐ Industrial ☐ Irrigation ☐ Injection ☐ Public Supply ☐ De-watering ☐ Testwell
If Public Supply well, were plans submitted to the TNRCC? ☐ Yes ☐ No

5) N↑

6) Drilling Date

Started **6/7/2004**

Completed **6/7/2004**

Diameter of Hole

Dia. (in)	From (ft)	To (ft)
11	0	25

7) Drilling Method (check) ☐ Driven

☐ Air Rotary ☐ Mud Rotary ☒ Bored
☐ Air Hammer ☐ Cable Tool ☐ Jetted
☐ Other _____

From (ft)	To (ft)	Description and color of formation material
0	.05	concrete
.05	5.5	sand clayey dk brn
5.5	10	clay dk gray
10	15	clay yellow/red silty
15	16	silt clayey dk brn
16	23	clay silty hard dk gray
23	25	silty clayey dk gray

8) Borehole Completion ☐ Open Hole ☐ Straight Wall
☐ Under-reamed ☒ Gravel Packed ☐ Other _____
If Gravel Packed give the interval from **3** ft. to **25** ft.

Casing, Blank Pipe, and Well Screen Data

Dia. (in.)	New Or Used	Steel, Plastic, etc. Perf., Slotted, etc. Screen Mfg., if commercial	Setting (ft)		Gage Casing Screen
			From	To	
4	N	pvc - LSWP	0	5	riser
4	N	pvc - LSWP	5	25	.010

9) Cementing Data

Cementing from **0** ft. to **2** ft. # of sacks used **1**
_____ ft. to _____ ft. # of sacks used _____

Method Used **pump & tremmie**

Cementing By **driller**

Distance to septic system field or other concentrated contamination _____ ft.

Method of verification of above distance _____

13) Plugged

☐ Well plugged within 48 hours

Casing left in well: Cement/Bentonite placed in well:

From (ft)	To (ft)	From (ft)	To (ft)	Sacks used

14) Typepump

☐ Turbine ☐ Jet ☐ Submersible ☐ Cylinder
☐ Other _____

Depth to pump bowls, cylinder, jet, etc., _____ ft.

15) Water Test

Testest ☐ Pump ☐ Bailor ☐ Jetted ☐ Estimated
Yield: _____ gpm with _____ ft. drawdown after _____ hrs.

16) Water Quality

Did you knowingly penetrate any strata which contain undesirable constituents?
☐ Yes ☒ NO If yes, did you submit a REPORT OF UNDESIRABLE WATER?

Type of water **fresh** Depth of Strata **8**

Was a chemical analysis made? ☐ Yes ☒ No

10) Surface Completion

☒ Specified Surface Slab Installed
☐ Specified Surface Sleeve Installed
☐ Pitless Adapter Used
☐ Approved Alternative Procedure Used

11) Water Level

Static level _____ ft. below _____ Date _____
Artesian Flow _____ gpm. _____ Date _____

12) Packers

Type _____ Depth _____

Bentonite Seal

2-3

Company or Individual's Name (type or print) **Master Monitoring Services, Inc.**

Lic. No. **3044 M**

Address **P.O. Box 800456**

City **Houston**

State **Tx**

Zip **77280-0456**

Signature 
Licensed Driller/Pump Installer

7/1/04

Date

Signature _____

Apprentice

Date _____

Attention Owner:
Confidentiality Privilege Notice
on reverse side of owner's copy.

Texas Department of License and Regulation
Water Well Driller/Pump Installer Program
P.O. Box 12157 Austin, Texas 78711 (512) 463-7880 FAX (512) 463-8616
Toll free (800) 803-9202
Email address: water.well@license.state.tx.us

This form must be completed
and filed with the department
and owner within 60 days
upon completion of the well.

WELL REPORT

1) OWNER

A. WELL IDENTIFICATION AND LOCATION DATA

Name **Safety-Kleen Systems** Address **4800 S. Old Peach Tree Rd.** City **Norcross** State **GA** Zip **30071**

2) WELL LOCATION AW-4

County **Harris** Physical Address **3333 Federal Road** City **Pasadena** State **TX** Zip **77504**

3) Type of Work

☒ New Well ☐ Deepening
☐ Reconditioning

Lat. **29** **39** **26N** Long. **95** **11** **35W** Grid # **65-23-8**

4) Proposed Use (check) ☒ Monitor ☐ Environmental Soil Boring ☐ Domestic
☐ Industrial ☐ Irrigation ☐ Injection ☐ Public Supply ☐ De-watering ☐ Testwell
If Public Supply well, were plans submitted to the TNRCC? ☐ Yes ☐ No

5) N↑

6) Drilling Date

Started **6/7/2004**

Completed **6/7/2004**

Diameter of Hole

Dia. (in)	From (ft)	To (ft)
11	0	25

7) Drilling Method (check) ☐ Driven

☐ Air Rotary ☐ Mud Rotary ☒ Bored
☐ Air Hammer ☐ Cable Tool ☐ Jetted
☐ Other _____

From (ft)	To (ft)	Description and color of formation material
0	.05	concrete
.05	5.5	sand clayey dk brn
5.5	10	clay dk gray
10	15	clay yellow/red silty
15	16	silt clayey dk brn
16	23	clay silty hard dk gray
23	25	silty clayey dk gray

8) Borehole Completion ☐ Open Hole ☐ Straight Wall
☐ Under-reamed ☒ Gravel Packed ☐ Other _____
If Gravel Packed give the interval from **3** ft. to **25** ft.

Casing, Blank Pipe, and Well Screen Data

Dia. (in.)	New Or Used	Steel, Plastic, etc. Perf., Slotted, etc. Screen Mfg., if commercial	Setting (ft)		Gage Casing Screen
			From	To	
4	N	pvc - LSWP	0	5	riser
4	N	pvc - LSWP	5	25	.010

9) Cementing Data

Cementing from **0** ft. to **2** ft. # of sacks used **1**
_____ ft. to _____ ft. # of sacks used _____

Method Used **pump & tremmie**

Cementing By **driller**

Distance to septic system field or other concentrated contamination _____ ft.

Method of verification of above distance _____

13) Plugged

☐ Well plugged within 48 hours

Casing left in well:

Cement/Bentonite placed in well:

From (ft)	To (ft)	From (ft)	To (ft)	Sacks used

14) Typepump

☐ Turbine ☐ Jet ☐ Submersible ☐ Cylinder
☐ Other _____

Depth to pump bowls, cylinder, jet, etc., _____ ft.

15) Water Test

Typetest ☐ Pump ☐ Bailer ☐ Jetted ☐ Estimated
Yield: _____ gpm with _____ ft. drawdown after _____ hrs.

16) Water Quality

Did you knowingly penetrate any strata which contain undesirable constituents?
☐ Yes ☒ NO If yes, did you submit a REPORT OF UNDESIRABLE WATER?

Type of water **fresh** Depth of Strata **2**

Was a chemical analysis made? ☐ Yes ☒ No

10) Surface Completion

☒ Specified Surface Slab Installed
☐ Specified Surface Sleeve Installed
☐ Pitless Adapter Used
☐ Approved Alternative Procedure Used

11) Water Level

Static level _____ ft. below _____ Date _____
Artesian Flow _____ gpm. _____ Date _____

12) Packers

Type _____ Depth _____

Bentonite Seal

2-3

Company or Individual's Name (type or print) **Master Monitoring Services, Inc.**

Lic. No. **3044 M**

Address **P.O. Box 800456**

City **Houston**

State **Tx**

Zip **77280-0456**

Signature *John W. [Signature]*
Licensed Driller/Pump Installer

7/1/04

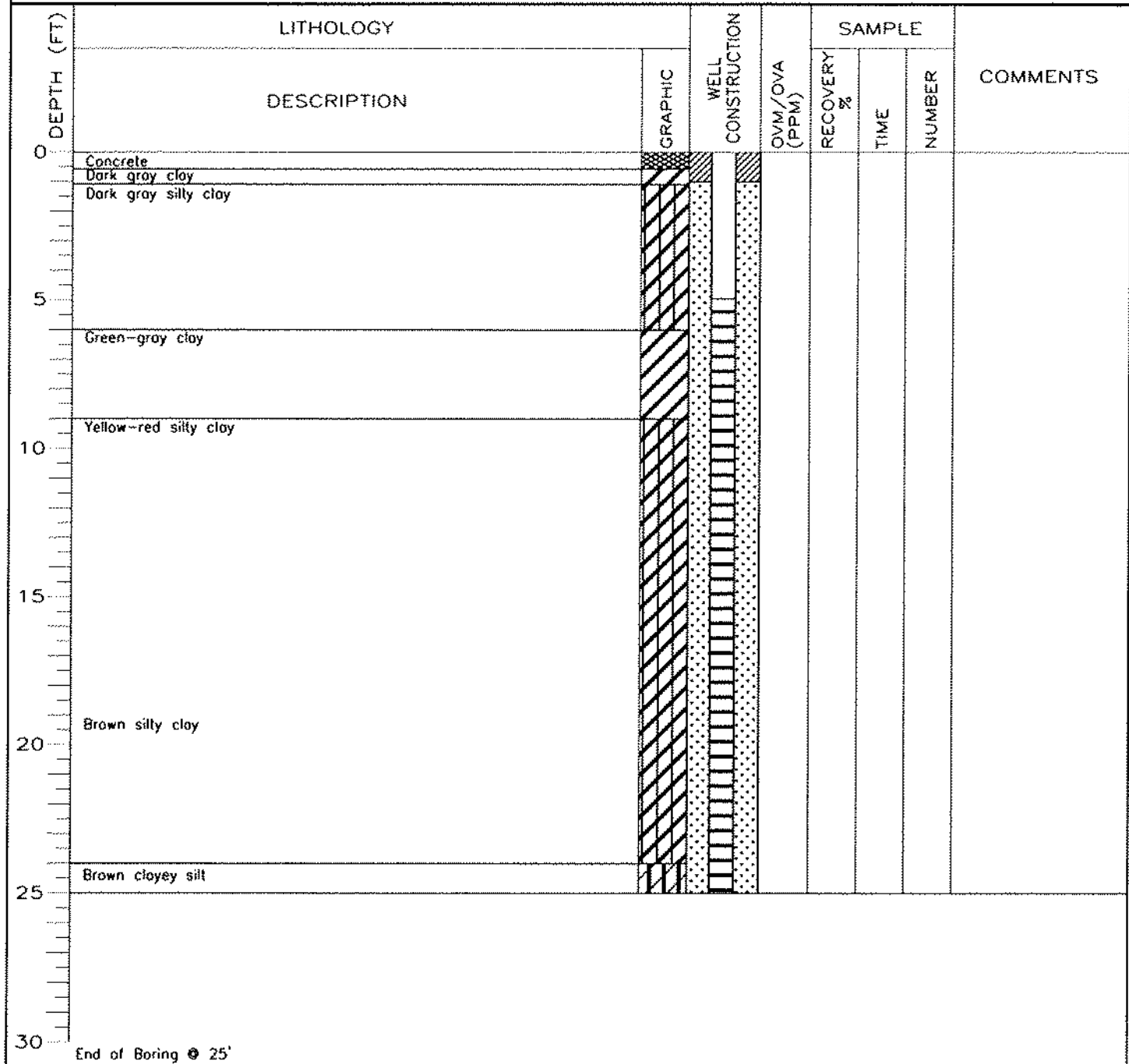
Date

Signature _____

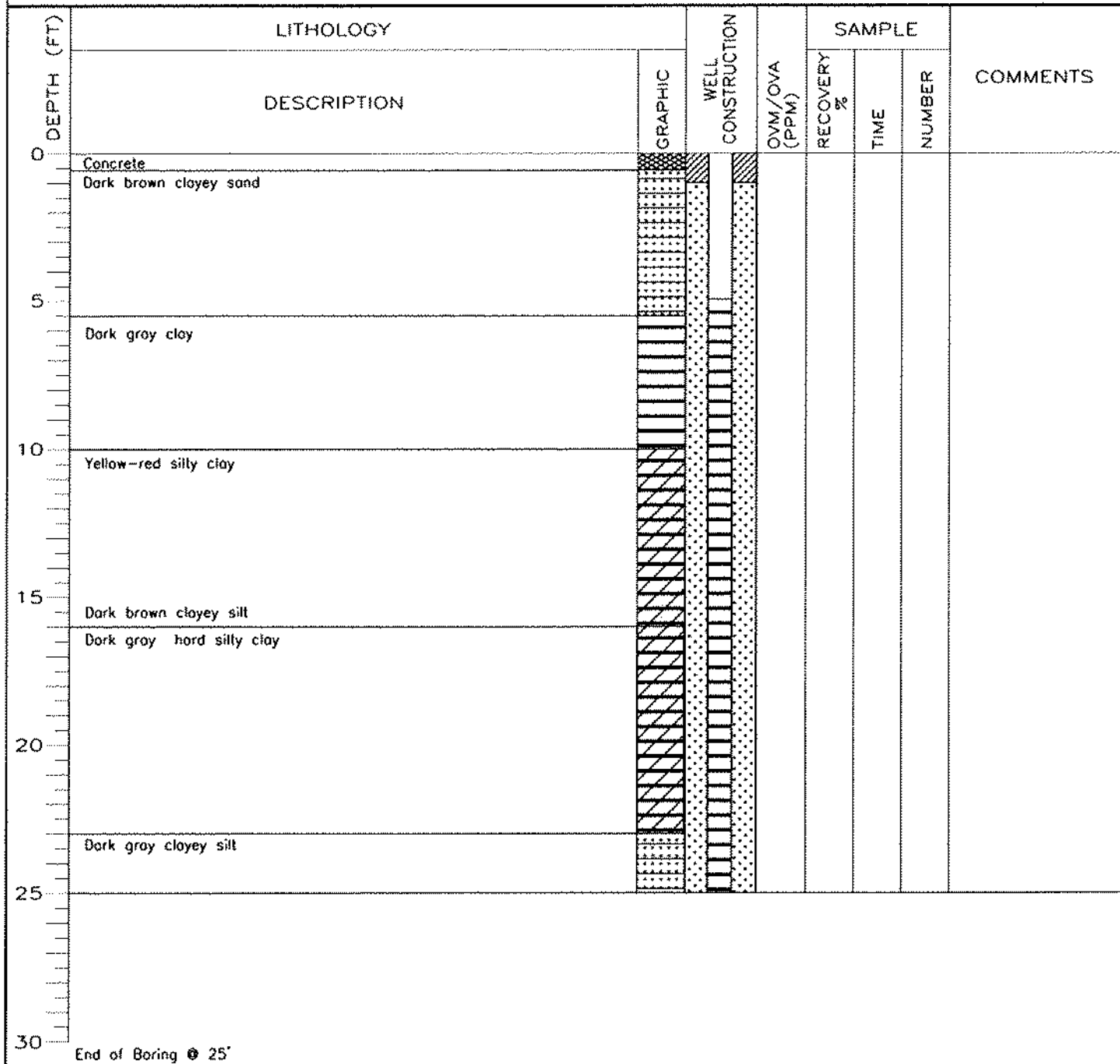
Apprentice

Date _____

PROJECT ▶ Safely-Kleen Pasadena		Well Log	PROJECT NUMBER ▶ 73.75115.0002	
LOGGED BY ▶			START DATE ▶ 06-07-04	
CHECKED BY ▶			COMPLETION DATE ▶ 06-07-04	
GROUND SURFACE ELEVATION DATUM (FT-MSL) ▶			DRILLING COMPANY ▶ Master Monitoring	
DRILLING EQUIPMENT ▶ B-61, HSA			DRILLER ▶ John	
BORING DEPTH(FT) ▶ 25	WELL DEPTH(FT) ▶ 25	WATER DEPTH(FT) - Initial: Complete:		
WELL MATERIALS ▶ 4" PVC WELL SCREEN			OVM/OVA ▶	
BACKFILL MATERIAL ▶				



PROJECT ▶ Safety-Kleen Pasadena		Well Log	PROJECT NUMBER ▶ 73.75115.0002	
LOGGED BY ▶			START DATE ▶ 06-07-04	
CHECKED BY ▶			COMPLETION DATE ▶ 06-07-04	
GROUND SURFACE ELEVATION DATUM (FT-MSL) ▶			DRILLING COMPANY ▶ Master Monitoring	
DRILLING EQUIPMENT ▶ B-61, HSA			DRILLER ▶ John	
BORING DEPTH(FT) ▶ 25	WELL DEPTH(FT) ▶ 25	WATER DEPTH(FT) - Initial: Complete:		
WELL MATERIALS ▶ 4" PVC WELL SCREEN		OVM/OVA ▶		
BACKFILL MATERIAL ▶				



PROJECT ▶ Safety-Kleen Posodeno		Well Log	PROJECT NUMBER ▶ 73.75115.0002	
LOGGED BY ▶			START DATE ▶ 06-07-04	
CHECKED BY ▶			COMPLETION DATE ▶ 06-07-04	
GROUND SURFACE ELEVATION DATUM (FT-MSL) ▶		DRILLING COMPANY ▶ Master Monitoring		
DRILLING EQUIPMENT ▶ B-61, HSA		DRILLER ▶ John		
BORING DEPTH(FT) ▶ 25	WELL DEPTH(FT) ▶ 25	WATER DEPTH(FT)-Initial: Complete:		
WELL MATERIALS ▶ 4" PVC WELL SCREEN		OVM/OVA ▶		

BACKFILL MATERIAL ▶

DEPTH (FT)	LITHOLOGY		WELL CONSTRUCTION	OVM/OVA (PPM)	SAMPLE			COMMENTS
	DESCRIPTION	GRAPHIC			RECOVERY %	TIME	NUMBER	
0	Concrete							
	Dark brown clayey sand							
5								
	Dark gray clay							
10								
	Yellow-red silty clay							
15								
	Dark brown clayey silt							
	Dark gray hard silty clay							
20								
	Dark gray clayey silt							
25								
30	End of Boring @ 25'							

BORING DESIGNATION
AW-4



PAGE NUMBER
1 OF 1

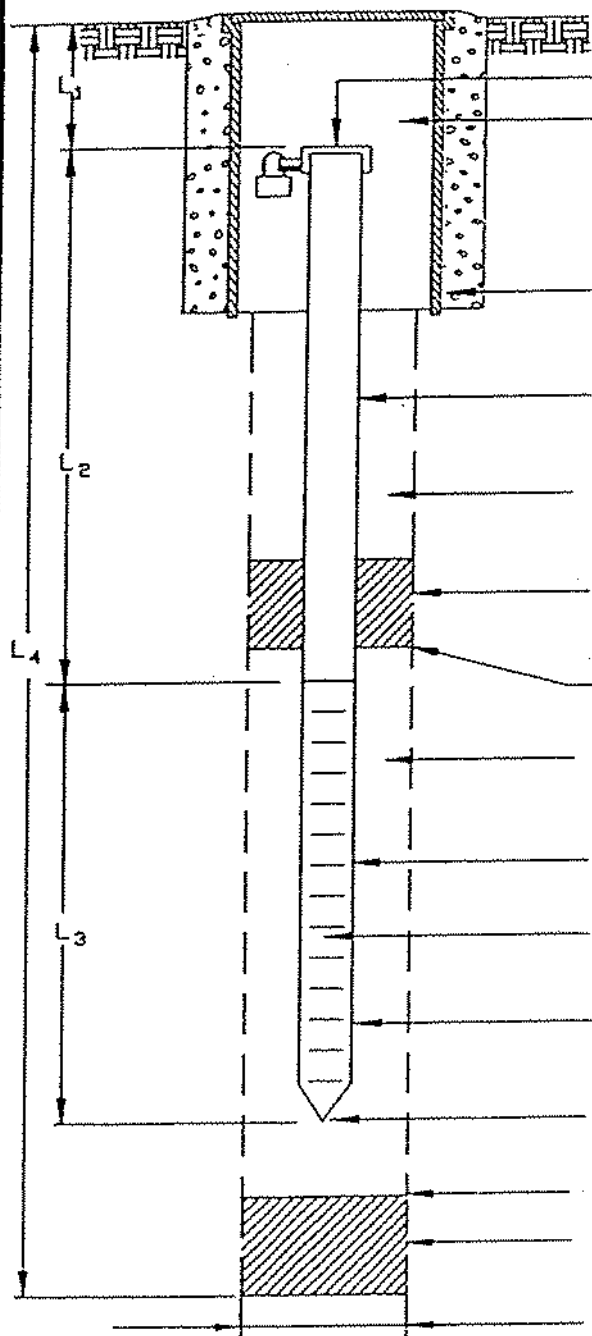
INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: Safety-Kleen Pasadena

MONITORING WELL NO. MW-1 (SB-1)

JOB NO. 60-93-036.01

TDP OF RISER ELEVATION:



WATER-TIGHT CAP

FLUSH GRADE WELL CONSTRUCTION

DIAMETER & MATERIAL

TOTAL LENGTH

LENGTH ABOVE GROUND

-THICKNESS & TYPE OF SEAL

DIAMETER, MATERIAL & JOINT TYPE
OF RISER PIPE

TYPE OF BACKFILL AROUND RISER

THICKNESS & TYPE OF SEAL.

-DISTANCE OF FILTER SAND ABOVE TOP
OF SCREEN

TYPE OF FILTER AROUND SCREEN

MONITORING WELL MATERIAL

SCREEN GAUGE OR SIZE OF OPENING
(SLOT SIZE)

DIAMETER & LENGTH OF SCREEN

DEPTH TO THE BOTTOM OF MONITORING
WELL

DEPTH TO BOTTOM OF FILTER SAND

THICKNESS & TYPE OF SEAL

DIAMETER OF BOREHOLE

16 inch steel

12 inches

●

4 inch concrete

4 inch PVC

screw joint

concrete/bentonite
slurry

2 feet bentonite pellets

2 feet

20/40 sand

4 inch, PVC

10 slot

4 X 10 inch

22 feet

22 feet

NA

6.25

$$\begin{array}{lcl} L_1 = & \frac{0.8}{11.2} & \text{FT} \\ L_2 = & \frac{11.2}{10} & \text{FT} \\ L_3 = & \frac{10}{22} & \text{FT} \\ L_4 = & \frac{22}{0.8} & \text{FT} \end{array}$$

INSTALLATION COMPLETED

DATE: _____

TIME: _____

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
06/01/93	1100	17 feet

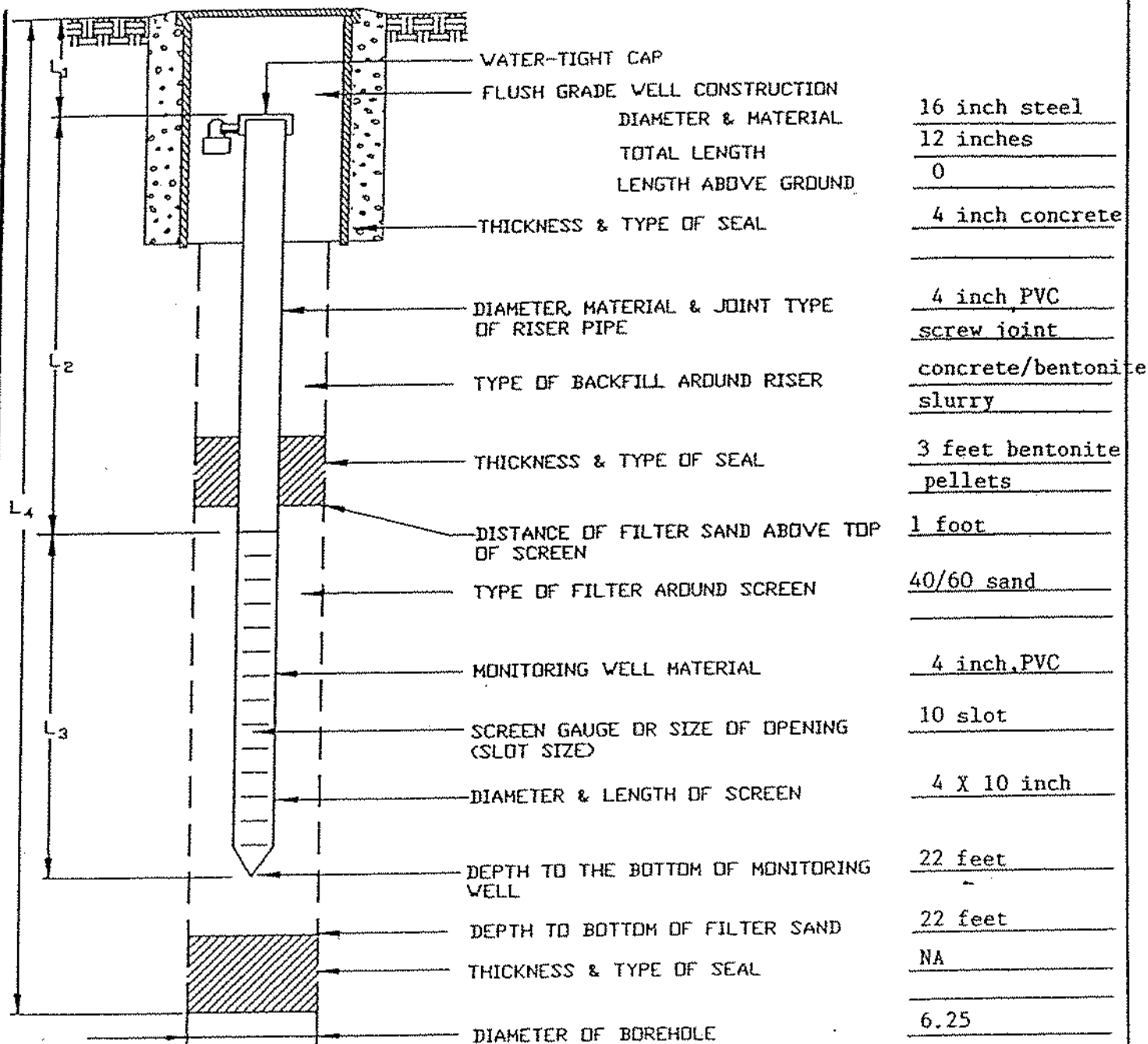
(*) DEPTH BELOW TOP OF RISER



Delta
Environmental
Consultants, Inc.

INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: Safety-Kleen Pasadena MONITORING WELL NO. MW-2 (SB-2)
 JOB NO. 60-93-036.01 TOP OF RISER ELEVATION: _____



L₁ = 0.8 FT
 L₂ = 11.2 FT
 L₃ = 10 FT
 L₄ = 22 FT

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
06/01/93	1545	16.2 feet

INSTALLATION COMPLETED:
 DATE: _____
 TIME: _____

(*) DEPTH BELOW TOP OF RISER



Delta
 Environmental
 Consultants, Inc.

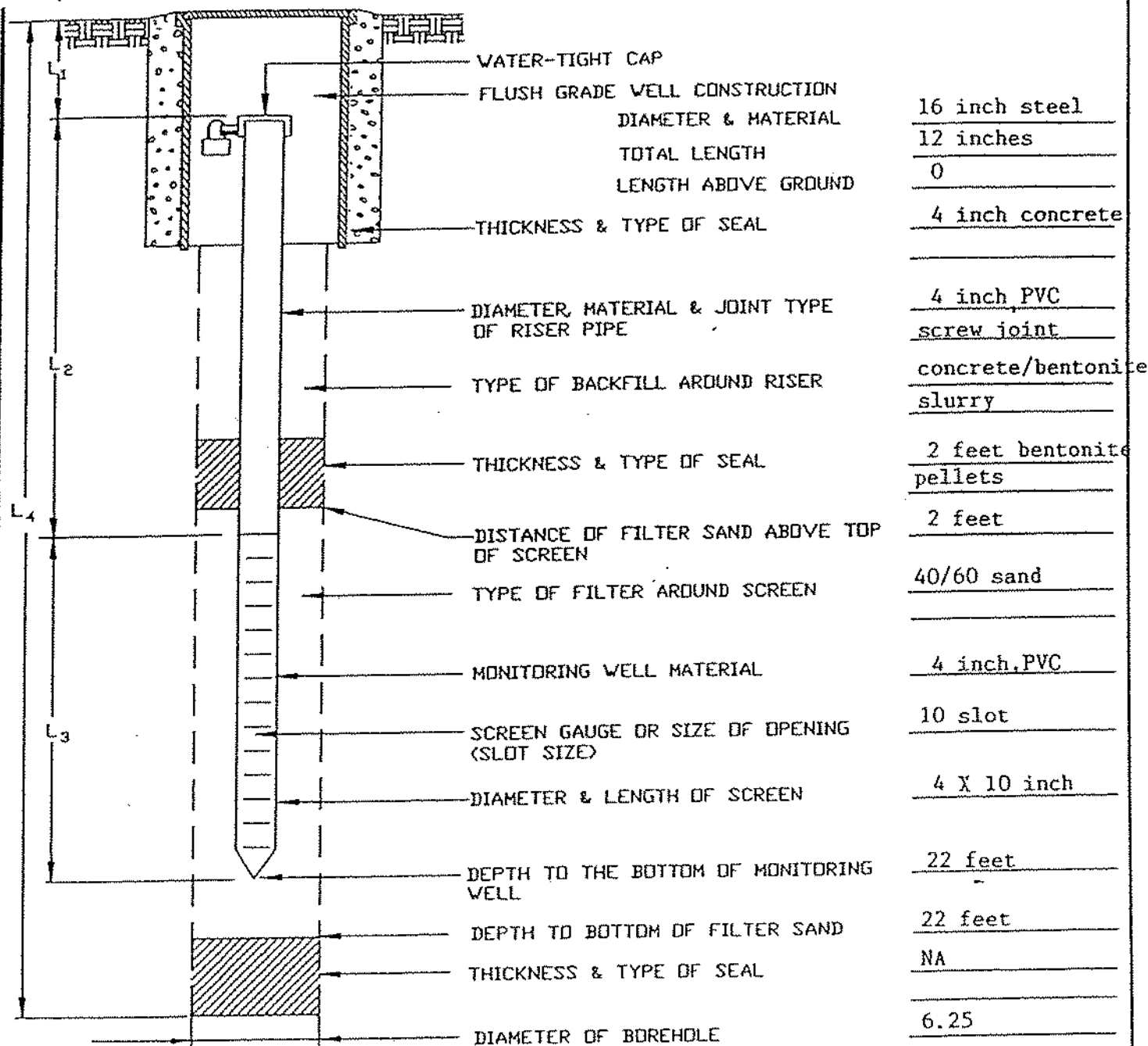
INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: Safety-Kleen Pasadena

MONITORING WELL NO. MW-3 (SB-4)

JOB NO. 60-93-036.01

TOP OF RISER ELEVATION: _____



L₁ = 0.8 FT
L₂ = 11.2 FT
L₃ = 10 FT
L₄ = 22 FT

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
06/02/93	9:00	16.3 feet

INSTALLATION COMPLETED:
DATE: _____
TIME: _____

(*) DEPTH BELOW TOP OF RISER



Delta
Environmental
Consultants, Inc.

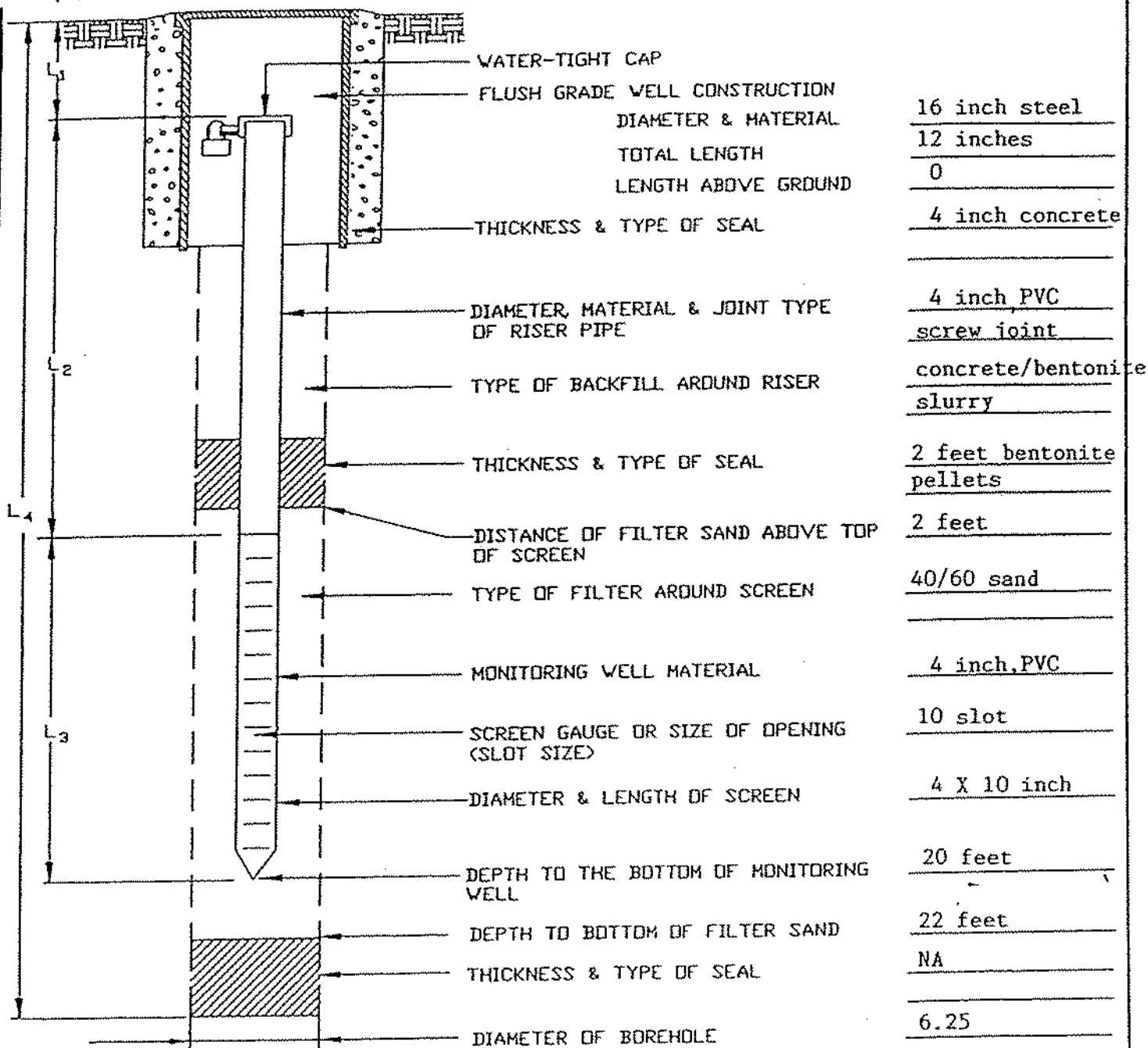
INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: Safety-Kleen Pasadena

MONITORING WELL NO. MW-4 (SB-5)

JOB NO. 60-93-036.01

TOP OF RISER ELEVATION: _____



L₁ = 0.8 FT

L₂ = 9.2 FT

L₃ = 10 FT

L₄ = 22 FT

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
06/03/93	1215	7.2 feet

INSTALLATION COMPLETED: _____

DATE: _____

TIME: _____

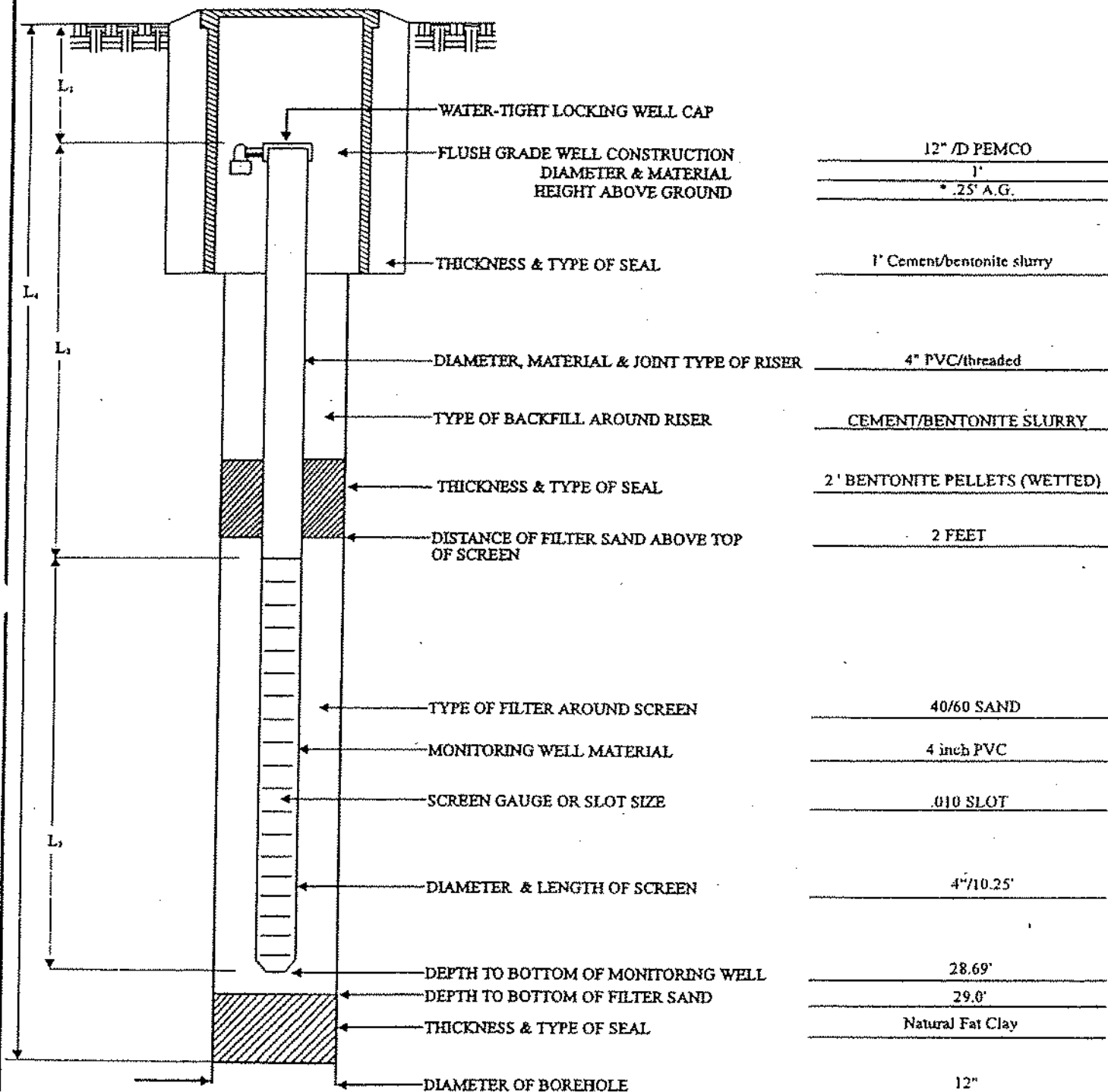
(*) DEPTH BELOW TOP OF RISER



Delta
Environmental
Consultants, Inc.

INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: SAFETY-KLEEN PASADENA, TX MONITORING WELL NO.: MW-5
 JOB NO.: E193-016-5 TOP OF RISER ELEVATION: 96.68 Feet



L₁ = 44 FT
 L₂ = 18 FT
 L₃ = 10.25 FT
 L₄ = 28.69 FT

INSTALLATION COMPLETED:

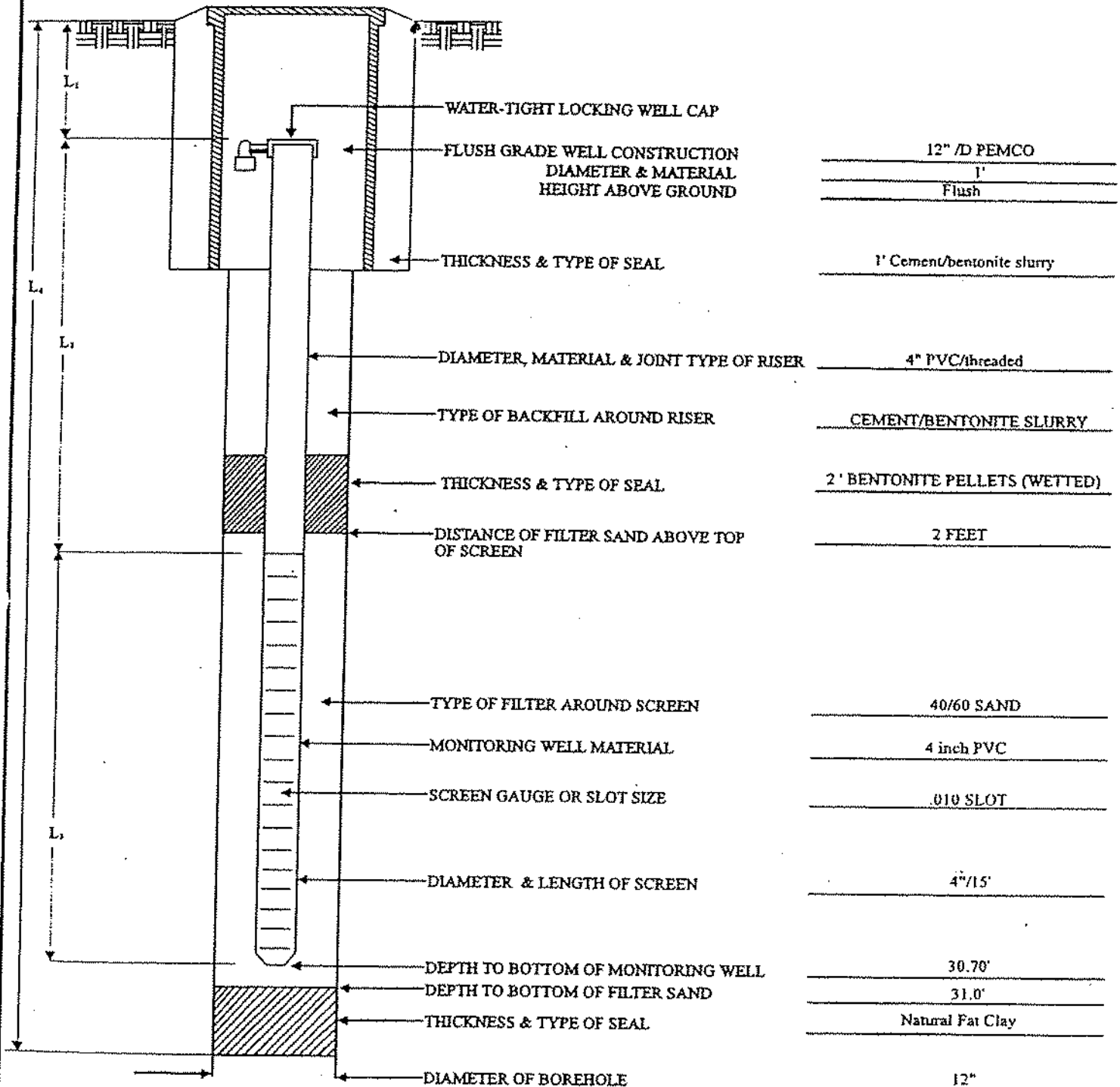
DATE: 09/30/94
 TIME: 12:30

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
10-11-93	8:15	12.30'

(* Depth Below Top Of Riser)

INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: SAFETY-KLEEN PASADENA, TX MONITORING WELL NO.: MW-6
 JOB NO.: F193.036.5 TOP OF RISER ELEVATION: 98.36 Feet



L₁ = .46 FT
 L₂ = 15 FT
 L₃ = 15.25 FT
 L₄ = 30.71 FT

INSTALLATION COMPLETED:

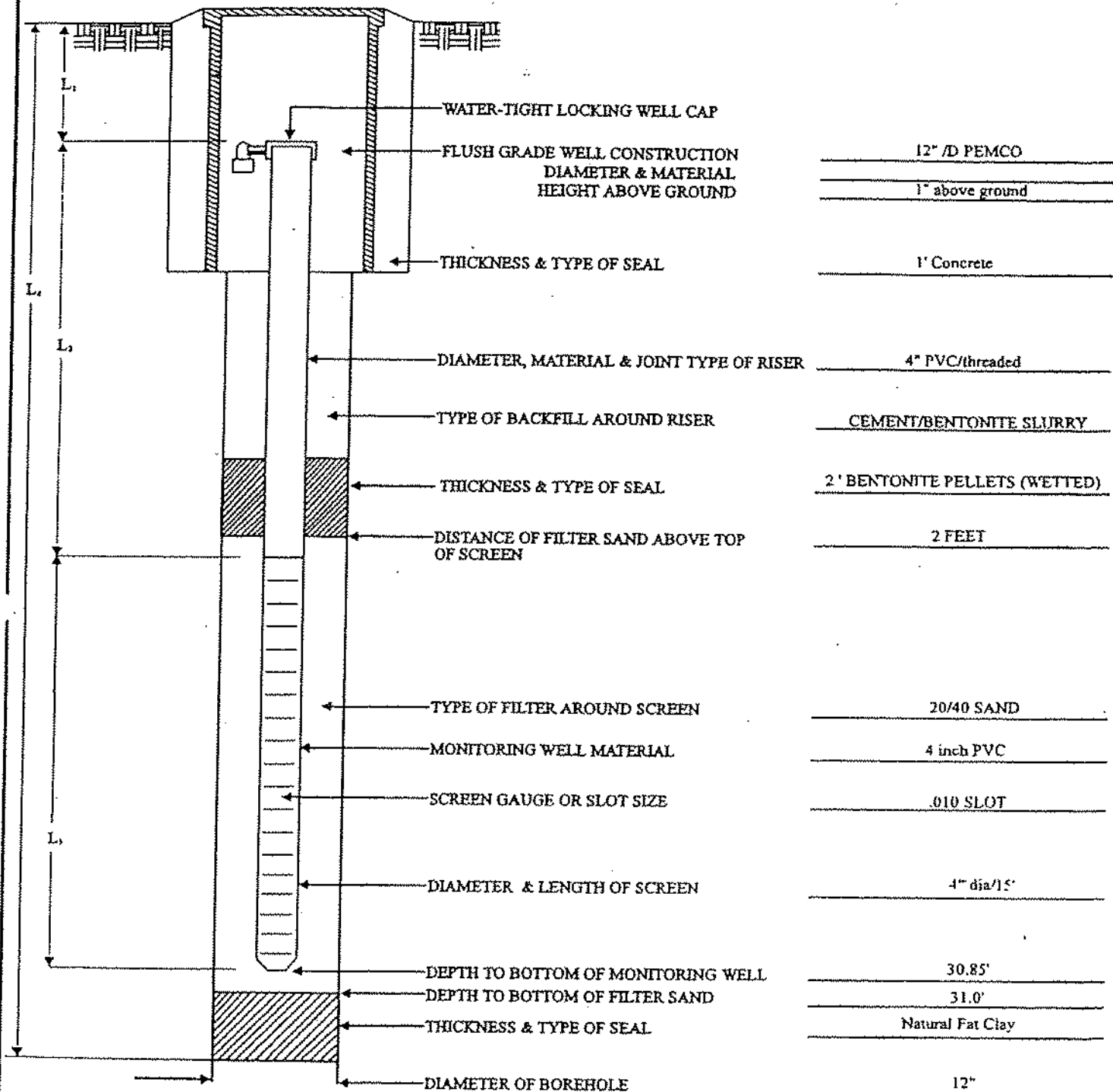
DATE: 09/30/94
 TIME: 15:30

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
10-11-93	8:30	11.99'

(*) Depth Below Top Of Riser

INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: SAFETY-KLEEN PASADENA, TX MONITORING WELL NO.: MW-7
 JOB NO.: F193.036-5 TOP OF RISER ELEVATION: 99.32 Erel



L₁ = .60 FT
 L₂ = 15 FT
 L₃ = 15.25 FT
 L₄ = 30.85 FT

INSTALLATION COMPLETED:

DATE: 09/30/94
 TIME: 18:45

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
10-11-93	8:50	12.60'

(*) Depth Below Top Of Riser



Drilling Log

Monitoring Well MW-8

Project Safety Kleen Pasadena Owner Safety Kleen
 Location Pasadena Proj. No. 05040-0690
 Surface Elev. _____ Total Hole Depth 40 ft. Diameter 15.5 in.
 Top of Casing _____ Water Level Initial _____ Static _____
 Screen: Dia 4 in. Length 5 ft. Type/Size 0.010 in.
 Casing: Dia ic:4; oc:10 in. Length ic:34; oc:31 ft. Type SCH 40
 Fill Material 20/40 Rig/Core Split Spoon
 Drill Co. Best Drilling Method HSA
 Driller Keith Barge Log By Ray Anderson Date 10/08/97 Permit # _____
 Checked By _____ License No. _____

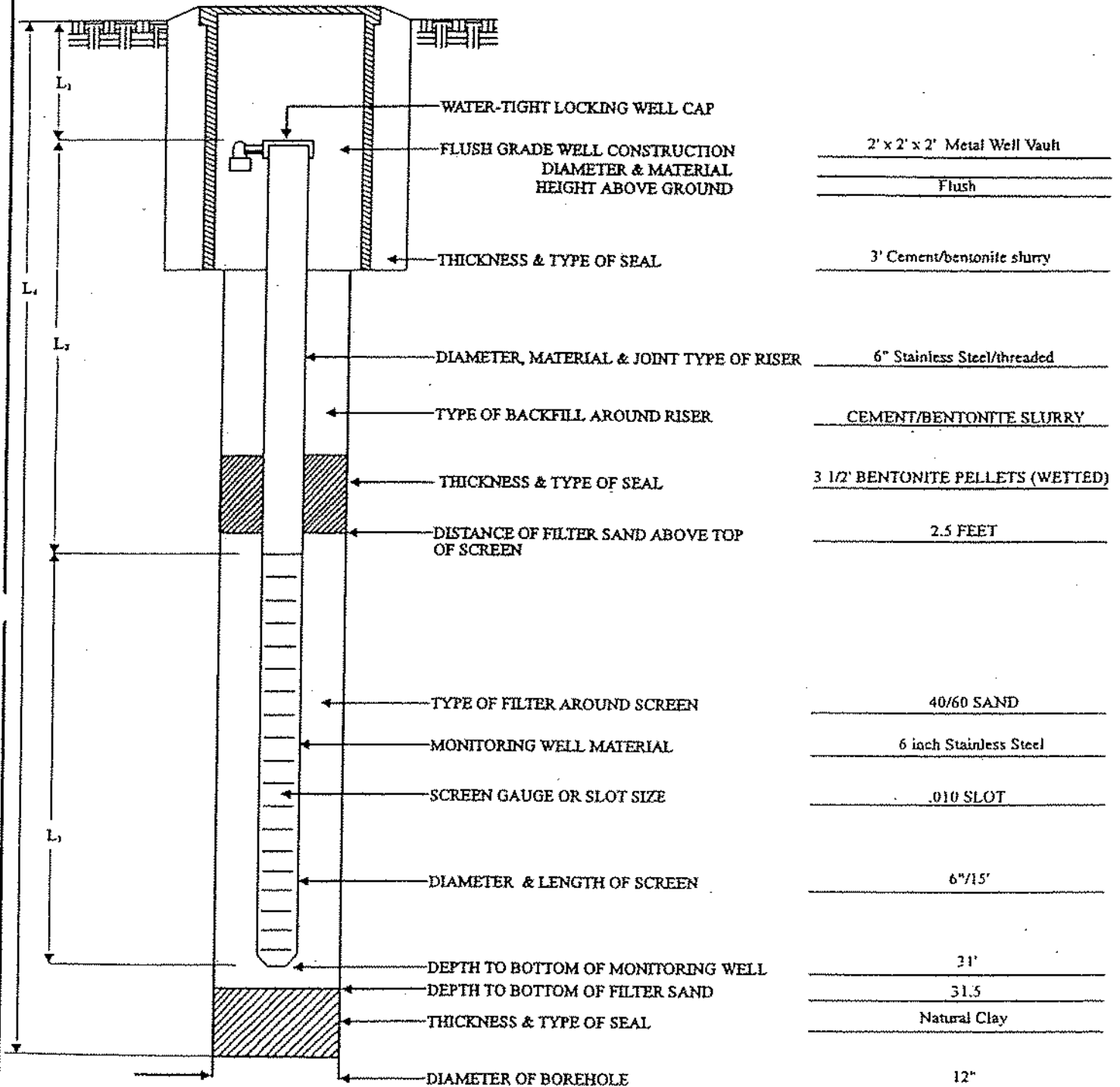
See Site Map
For Boring Location

COMMENTS:

Depth (ft)	Well Completion	PID (ppm)	Sample ID	Blow Count/ Recovery	Graphic Log	USCS Class.	Description (Color, Texture, Structure) Trace < 10%, Little 10% to 20%, Some 20% to 35%, And 35% to 50%
-2							
0							0.0'-0.5' concrete with rebar
2		11.0				CL	0.5'-1.0' CLAY, dark gray to yellow/red, hard
4		12.8					1.0'-6.0' CLAY, dark grey, silty, hard, iron staining
6		123.8					6.0'-9.0' CLAY, green/grey, hard, slight odor
8		47.8					9.0'-14.0' CLAY, yellow/red, silty, hard
10							
12							
14		37.7				CL	14.0'-19.0' CLAY, yellow/red, silty, hard
16							
18							19.0'-24.0' CLAY, brown, silty, hard
20		48.2					
22							
24		20.3					24.0'-29.0' SILT, clayey, soft, wet
26						ML	
28							
30		18.8				CL	29.0'-30.0' CLAY, brown, to yellow/red, silty
32		0.0					30.0'-35.0' SILT and CLAY interbedding, yellow/red, hard, no odor
34						CL	
36		0.0					35.0'-38.0' SAND, yellow/red, silty, hard, no odor
38						SM	
40		0.0				CL	38.0'-40.0' CLAY, yellow/red, silty with sand lenses throughout, hard, no odor
42							END OF BORING

INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: SAFETY-KLEEN PASADENA, TX MONITORING WELL NO.: RW-1
 JOB NO.: F193-036-5 TOP OF RISER ELEVATION: 98.45 Feet



L₁ = 1.0 FT
 L₂ = 15 FT
 L₃ = 15 FT
 L₄ = 31.5 FT

INSTALLATION COMPLETED:

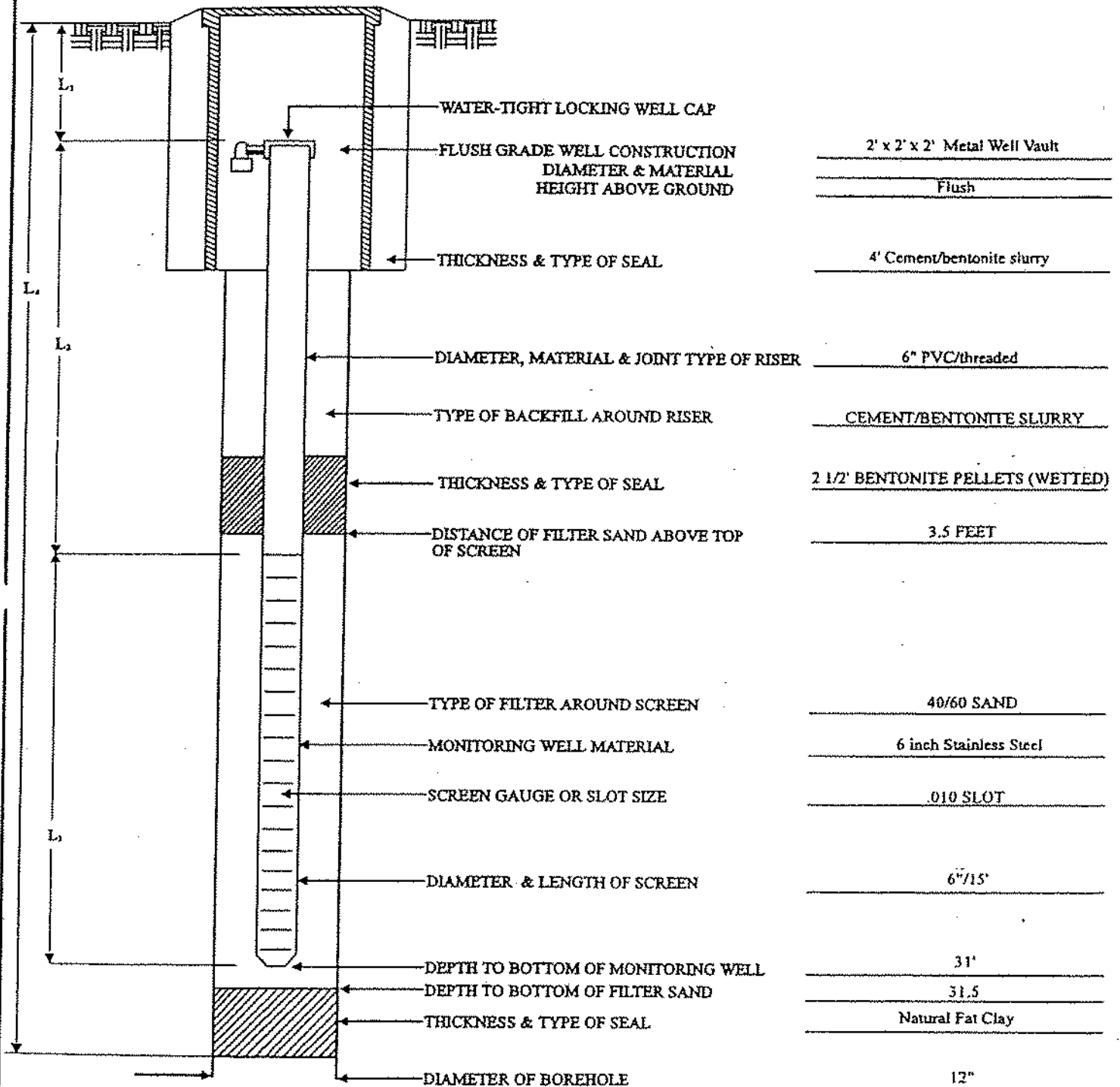
DATE: 09/29/94
 TIME: 16:00

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
10-11-93	9:10	12.04'

(*) Depth Below Top Of Riser

INSTALLATION OF FLUSH GRADE MONITORING WELL

PROJECT: SAFETY-KLEEN PASADENA, TX MONITORING WELL NO.: RW-2
 JOB NO.: E193.036-5 TOP OF RISER ELEVATION: 98.06 Feet



L₁ = .75 FT
 L₂ = 15 FT
 L₃ = 15.25 FT
 L₄ = 31.5 FT

INSTALLATION COMPLETED:

DATE: 10/01/94
 TIME: 15:00

MONITORING WELL WATER LEVEL MEASUREMENTS		
DATE	TIME	WATER LEVEL *
10-11-93	8:00	11.63'

(*) Depth Below Top Of Riser



Drilling Log

Monitoring Well RW-4

Project Safety Kleen Pasadena Owner Safety Kleen
 Location Pasadena Proj. No. 05040-0690
 Surface Elev. _____ Total Hole Depth 31 ft. Diameter 15.5 in.
 Top of Casing _____ Water Level Initial _____ Static _____
 Screen: Dia 6 in. Length 20 ft. Type/Size 0.010 in.
 Casing: Dia 6 in. Length 11 ft. Type Stainless screen/SCH 40
 Fill Material 20/40 Rig/Core Split Spoon
 Drill Co. Best Drilling Method HSA
 Driller Keith Borge Log By Ray Anderson Date 10/09/97 Permit # _____
 Checked By _____ License No. _____

See Site Map
For Boring Location

COMMENTS:

Depth (ft.)	Well Completion	PID (ppm)	Sample ID Blow Count/ X Recovery	Graphic Log	USCS Class.	Description (Color, Texture, Structure) Trace < 10%, Little 10% to 20%, Some 20% to 35%, And 35% to 50%
-2						
0					conc	0-0.5' concrete with rebar
2					SC	0.5'-5.5' SAND, clayey, loose, wet, strong odor
4		258				
6					CL	5.5'-10' CLAY, dark grey, hardy, strong odor
8						
10		480			CL	10'-15' CLAY, yellow/red, silty, hard, odor
12						
14						
16		690			ML	15'-18' SILT, clayey, soft, wet, odor
18						
20					CL	18'-23' CLAY, silty, hard, odor
22		120				
24		83			CL	23'-25.5' SILT, clayey, soft, wet, odor
26						
28					CL	25.5'-31' CLAY, brown to yellow/red, silty, hard, odor
30		24				
32						END OF BORING
34						
36						
38						
40						

Send original copy by certified
return receipt requested mail to:

TDLR
P.O. Box 12157
Austin, TX 78711

State of Texas
PLUGGING REPORT

(This form must be completed and filed with the TDLR
within 30 days following the date the well is plugged as
required by current statutory law.)

A. WELL IDENTIFICATION AND LOCATION DATA

1) OWNER: Safety Klean Corp. ADDRESS: 3333 Federal St. Pasadena TX 77504
(Name) (Street or RFD) (City) (State) (Zip)
2) ADDRESS OF WELL: Harris Co. 3333 Federal St. Pasadena TX 77504 LONG. LAT.
County (Street, RFD or other) (City) (State) (Zip) GRID # 15-23-9
3) OWNER'S WELL NO: OW-3 4) WELL TYPE (Check): ☐ Water ☒ Monitor ☐ Injection ☐ De-watering

Driller, Pump installer, or Landowner performing the plugging operations must locate and identify the location of the well within a specific grid on a full scale-gridded County map available from the Texas Water Development Board. The location of the well should be denoted within the grid by placing a corresponding dot in the grid to the right. The legal description section below is optional.

h. LEGAL DESCRIPTION:

Section No. _____ Block No. _____ Township _____

Abstract No. _____ Survey Name _____

Distance and direction from two
intersecting section lines or survey lines: _____

B. HISTORICAL DATA ON WELL TO BE PLUGGED (If available)

6) Driller N/A License No. _____ City _____
7) Drilled Mo/Day Year 8) Diameter of hole _____ inches; 9) Total depth of well _____ feet.

C. CURRENT PLUGGING DATA

10) Date well plugged 3-16-99

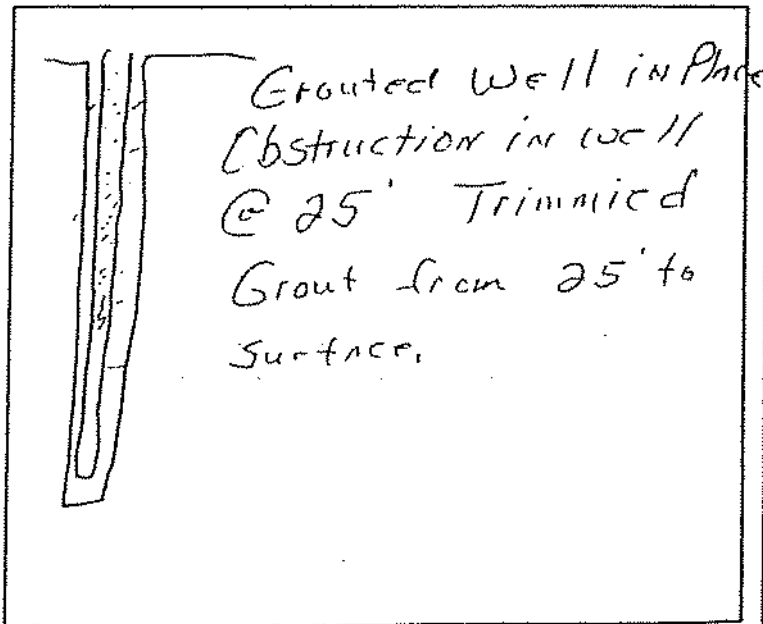
Sketch of well: Using space at right, show method of plugging the well
including all casing and cemented intervals.

12) Name of Driller/Pump Installer actually performing the plugging operations

John Loden
License number 3213 DMN

13) Casing and cementing data relative to the plugging operations:

DIAMETER (Inches)	CASING LEFT IN WELL	
	FROM (feet)	TO (feet)
4"	0	32
CEMENT / BENTONITE PLUG(S) PLACED IN WELL		SACK(S) OF CEMENT USED
FROM (feet)	TO (feet)	
0	25'	3



D. VALIDATION OF INFORMATION INCLUDED IN FORM

I certify that I plugged this well (or the well was plugged under my supervision) and that each and all of the statements herein are true and correct. I understand that failure to complete items 1 thru 13 will result in the report(s) being returned for completion and resubmittal.

Company or Individual's Name (type or print) CCI EnviroDrilling Inc.
Address: Street or RFD 1717 W. 22nd St City Houston State Tx Zip 77008

Signatures:

John Loden 3-16-99
Licensed Driller/Pump Installer Date Trained/Apprentice Date

PROJECT ▶ Former Safety-Kleen 3333 Federal Road, Pasadena, TX		Boring Log		PROJECT NUMBER ▶ 73.75118.2475	
LOGGED BY ▶ T.Tisch				START DATE ▶ 02/21/14	
CHECKED BY ▶ TLC				COMPLETION DATE ▶ 02/21/14	
GROUND SURFACE ELEVATION DATUM (FT-MSL) ▶			DRILLING COMPANY ▶ BEST Drilling		
DRILLING EQUIPMENT ▶ DPT & Hollow Stem Augar			DRILLER ▶ Benny		
BORING DEPTH(FT) ▶ 25		WELL DEPTH(FT) ▶ 25		WATER DEPTH(FT)—Initial: Complete:	
WELL MATERIALS ▶			OVM/OVA ▶ OVM		
BACKFILL MATERIAL ▶					

DEPTH (FT)	LITHOLOGY		GRAPHIC	WELL CONSTRUCTION	OVM/OVA (PPM)	SAMPLE			COMMENTS
	DESCRIPTION					RECOVERY %	TIME	NUMBER	
0	Soil Cover								Casing 0-5 feet Screen 5-25 feet Filter: 20/40 sand 4.5'-25' Seal: Bentonite chips 0.5'-4.5' Cover: 8" Flushmount
	CLAY, black with tree roots, moist, no HC odor			0	90+				
	CLAY, moist, no HC odor								
5	- turns gray			0	90+				
	CLAYEY SAND, red & brown mottles, moist, no HC odor								
	CLAY, reddish-brown with gray mottles, moist, no HC odor			0	90+				
10	- turns light gray								
	- turns reddish-brown with gray mottles			0	90+				
15	SANDY CLAY, reddish-brown, saturated, no HC odor					1035		MW-9 16'	
	CLAY, reddish-brown with gray mottles, saturated, no HC odor			0	90+				
20	SANDY CLAY, reddish-brown, saturated, no HC odor								
				0	90+			MW-9 20'	
25	End Of Boring @ 25'								
30									

BORING DESIGNATION MW-9		PAGE NUMBER 1 OF 1
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CP Attachment C
Sampling and Analysis Plan

GROUNDWATER SAMPLING AND ANALYSIS PLAN

Hazardous Waste Permit No. HW-50260-001
Compliance Plan No. CP-50260
Safety-Kleen Systems, Inc. – Pasadena Facility

1.0 INTRODUCTION

Impacts to groundwater were discovered during a spill assessment in June 1993. The impacts are due to incidental spillage (i.e., “Historic Spillage Area”, NOR # 005) while unloading waste liquids. A recovery system was installed in 1994 to remediate the groundwater. The groundwater action is being conducted under Compliance Plan CP-50260-001 originally issued August 1, 1997.

Safety-Kleen Systems, Inc. has established a corrective action program to monitor releases of hazardous constituents from the Historic Spillage Area as shown on the site map (Figure 1) of the facility at 3333 Federal Road, Pasadena, Texas 77504. As part of the Compliance Plan, Safety-Kleen is responsible for installation, operation, and maintenance of a Groundwater Monitoring System to evaluate the effectiveness of the Corrective Action Program.

Groundwater sampling and analysis under this program will be conducted according to this Sampling and Analysis Plan and in accordance with the USEPA publication, “Test Methods for Evaluating Solid Waste, Third Edition, (SW-846)”.

Copies of this Groundwater SAP will be maintained in the files at the Safety-Kleen Pasadena facility and used by personnel conducting sampling activities in the field. This SAP supersedes any previous SAP.

2.0 PRE-MOBILIZATION ACTIVITIES

2.1 Sampling Program Coordination

Prior to mobilization to the field for the sampling program, sampling personnel will review the Groundwater SAP to ensure collection of all necessary field data and conformance with the procedures described below. All necessary equipment will be procured and/or prepared for use prior to commencement of field activities.

The sampling program will be coordinated with the contract laboratory to ensure that properly prepared sample kits are available. The sample kits will include all necessary sample containers with closures and appropriate preservatives; coolers; waterproof labels; and chain-of-custody/analysis request forms.

Records of sampling events are maintained in logbooks and/or on standardized form such as the examples attached with this SAP, or other appropriate forms. Information to be recorded during the sampling event includes the following:

- Identification of sampling personnel;
- Identification of wells measured/sampled;
- Dates and times of measurement/sample collection;

- Results of static water level measurements and well soundings;
- Deficiencies in the physical condition of wells noted during well inspections;
- Purging/sampling methods and volumes;
- Results of field water quality measurements and visual inspection of samples; and
- Analyses to be performed, container types, and preservatives.

2.2 Health and Safety Plan Review

Field personnel will review the Health and Safety Plan prior to mobilization. Based on previous experience with groundwater sampling at Safety-Kleen, modified Level D protection, consisting of coveralls, hard hat, safety glasses, and steel-toed shoes, is adequate to ensure worker protection. Latex or other chemical resistant gloves will be worn during well purging and sampling. Field personnel will also review health and safety procedures for the Safety-Kleen facility to insure that all field personnel are prepared in the event of a medical emergency.

3.0 SAMPLING EQUIPMENT AND PROCEDURES

3.1 Static Water Level Survey

During each sampling event, a static water level survey will be conducted prior to well purging and sampling. Furthermore, each monitor well will be gauged for the presence/absence of light and dense non-aqueous phase liquids prior to purging the monitor well. The top of each well has been surveyed to a standard elevation.

Static water levels will be measured from the top of casing using an electronic water level indicator or other suitable device in all designated wells during each sampling event. Data will be recorded in logbooks and/or on forms (see attachments). To minimize the potential for cross-contamination, wells that have historically been clean will be measured before wells with elevated constituent concentrations. The downhole measuring device will be thoroughly rinsed with distilled or deionized water between well locations.

3.2 Well Integrity Inspection

Prior to purging, wells without permanently installed pumps will be sounded to total depth to detect the presence of silt accumulation at the base of the well or other obstruction. For each monitoring well or recovery well having a permanently installed pump, the total depth will be measured when the pump is pulled for maintenance or replacement, or when the production rate of the recovery well decreases by 25% or more from the baseline production rate.

The wells will also be inspected to confirm well integrity and identify needed repairs. Well inspections will document any observed deficiencies in the condition of the well casing, cap/protective cover, surface pad, and dedicated sampling equipment, if applicable. Any noted exceptions will be recorded in the logbooks or standard forms and brought to the attention of appropriate Safety-Kleen personnel upon completion of the sampling event.

3.3 Well Purging

Purging Equipment and Method

Wells to be sampled will be purged by slow-purge pumping prior to sample collection. Acceptable pumps include peristaltic and submersible electric pumps. When non-dedicated pumps are used for purging, they will be thoroughly cleaned prior to use in each well.

Non-dedicated pumps and associated cable will be cleaned by running the pump for several minutes each in: 1) a bucket of non-phosphate soap solution; 2) a bucket of deionized or distilled water; and 3) a second bucket of deionized or distilled water. The pump and cable will be submerged in the buckets during the cleaning process. The soap solution and rinse water buckets will be prepared at the beginning of each day and are replaced after four cycles of pump cleaning. At least once per day, in which non-dedicated pumps are used, a sample will be taken from the final rinse water bucket after completion of four cycles of pump cleaning. The samples will be analyzed for the parameters listed in Table 1. As an alternative to cleaning, as described above, the tubing used in a peristaltic pump can be replaced with new, unused tubing between use in each well.

Purging of each well may be accomplished through removing water using “micro-purging” until water quality indicator parameters stabilize. Either method should employ low-flow (i.e., a flow rate that does not exceed the rate at which the well was developed, 0.1 L/minute) techniques to minimize stress on the aquifer. Water level drawdown provides the best indication of stress imparted by a given flow-rate for a given hydrogeological situation. If a pump is used, the intake should be placed immediately below the air/water interface.

Management of Purge Water

The water will be transported to an approved off-site facility for treatment and/or disposal.

3.4 Groundwater Sample Collection

Timing of Sampling

The corrective action monitoring program will be conducted on a quarterly basis. Semi-annual reports will be submitted to the TCEQ to document monitoring program results.

Sampling Order of Wells and Timing of Sample Collection

To minimize potential for cross-contamination, wells included in the sampling program that have historically been clean will be sampled before wells previously showing elevated constituent concentrations. Sampling will be conducted as soon as practicable following purging. In the event that a well has been purged, but cannot be sampled on the same day, the well may be sampled within 24 hours following completion of purging without additional purging.

Sampling Equipment

Monitoring well will be sampled using either dedicated or non-dedicated equipment. Acceptable sampling devices include a syringe sampler (bailer) or the following submersible pumps: gear drive, bladder, helical rotor, piston (gas-driven), and centrifugal (low-rate). Equipment made from inert, non-reactive materials such as Teflon, stainless steel, Tygon, or other suitable materials will be used. If non-dedicated equipment is used, the equipment will be thoroughly cleaned as described above prior to use in each well, or will be replaced with new equipment.

Groundwater Sample Handling

Groundwater samples will be collected and handled in such a way so to minimize the potential for cross-contamination, loss of volatile constituents, or other interferences. Sampling personnel will wear clean latex, nitrile, or other suitable chemical resistant, non-reactive gloves when handling sampling equipment and containers, and will minimize contact with the sampled groundwater. Care will be taken to prevent contact of the downhole sampling equipment such as pumps, bailers, and cords, with the ground or other potential sources of sample contamination. Gloves will be changed between sampling locations.

Groundwater samples will be collected using techniques appropriate for the analytes to be tested. If pumps are used to collect samples for VOCs, the sampling flowrate will be regulated so the samples are collected at relatively low flow rates (approximately 100 ml/min). When bailers are used for sample collection, they will be lowered into the well slowly and poured carefully to minimize agitation. Samples for analysis of volatile compounds will not be collected using techniques that could excessively aerate the samples.

Collected samples will be retained in coolers pending transport to the laboratory with adequate ice to maintain samples at a temperature of approximately 4° C until received by the laboratory.

Sample Appearance and Field Parameter Analysis

A sample will be collected at each location for field analysis of temperature, specific conductance, pH, turbidity, dissolved oxygen, and oxidation-reduction potential (ORP). Equipment used to measure these parameters will be calibrated beforehand on the day of sampling. Equipment out of calibration by 10% or more will not be used for field measurements. Laboratory measurements of specific conductance and/or pH made within 24 hours of sample collection may augment or replace field measurements, in the event of field instrument malfunction or other factors.

The color, turbidity, and odor of each sample along with the field analysis parameters will be noted by the field technician and recorded in a logbook or on a field sample form (see attachments). Purge volume information, field parameter test results, and other sample information will also be recorded in a logbook and/or on a form.

Sample Containers, Preservatives, and Labels

Samples will be collected in clean, method-specified containers, with appropriate preservatives, supplied by the laboratory. The appropriate sample container and preservative for each analysis are specified on Table 2. Prior to use, sample containers will be stored, with lids secured, in a clean cooler or box.

Once a sample is collected, the sample container will be secured with a tight-fitting lid and a waterproof adhesive label affixed. The label will include sample identification, time and date of collection, sampler's initials, and other pertinent information, as appropriate. The sample containers will be retained in a cooler at or below 4 degrees Celsius as described above pending transport to the laboratory.

Sample Custody Control, and Shipment and Receipt of Samples

Sampling personnel will be responsible for the care of collected samples until custody has been transferred to the laboratory, courier, or shipping department. Sample custodians will assure that the sample containers are in the custodians' physical possession, in view at all times, or stored in a secure area to prevent tampering.

After sample collection, the chain-of-custody forms will be filled out in ink, in legible writing, listing all sample containers and will accompany the samples throughout all phases of shipment and handling (see attached example chain-of-custody form). Samples will be packed on sufficient ice to achieve a temperature of 4 degrees Celsius and sealed prior to shipment. To the extent practical, samples will be submitted to the laboratory within 24 hour of sample collection. If samples are delivered to the laboratory by a third party courier, a custody seal will be affixed to the cooler such that the cooler cannot be opened without breaking the seal.

Upon delivery of samples to the laboratory or courier, the sampler will retain a copy of the chain-of-custody form, signed by the sampler and/or laboratory personnel indicating the date and time the samples were relinquished and received. A copy of the chain-of-custody form showing all signatures from the sampler to the laboratory will be incorporated in the corrective action monitoring program records.

3.5 Collection of Quality Control Field Samples

For the purpose of the field sample Quality Control (QC) program, two laboratory-prepared Trip Blanks per sampling event will be submitted for analysis of volatile organic compounds. One Field Blank will be collected per day of sampling for analysis of the parameters listed on Table 1. Duplicate Samples will be collected from selected wells at a frequency of one Duplicate Sample for every ten groundwater samples collected per sampling event. The Duplicate Samples will be submitted for analysis of the parameters listed on Table 1.

4.0 ANALYTICAL LABORATORY PROCEDURES

Upon receipt, the laboratory will measure the internal temperature of each sample cooler. The samples will then be logged in and maintained at the appropriate temperature pending extraction and/or analysis within the method-specified holding times. In the event of sample container breakage or other problems with the sample shipment, the laboratory will contact the sampling contractor immediately.

Groundwater samples will be analyzed in accordance with EPA-specified protocol or other approved methods. Table 1 lists the compounds to be analyzed during the corrective action monitoring program. Table 2 lists the analytical methods, containers, preservatives, and holding times for the groundwater monitoring parameters.

4.1 Laboratory Methods and Sample Containers

Laboratory methods for analysis of various groundwater constituents and the appropriate sample containers and preservation methods are specified on Table 2. All laboratory analyses will be performed in accordance with the QA/QC protocol specified in USEPA publications "Test Methods for Evaluating Solid Waste", SW-846, 1996; "Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-20, 1983; or other appropriate methods. Minimum laboratory QA/QC requirements are outlined below.

4.2 Data Reduction, Validation, and Management

Data Reduction

Calculations and data reduction will be completed by laboratory personnel in accordance with procedures specified by USEPA in “Test Methods for Evaluating Solid Waste”, SW-846, 1996; “Methods for Chemical Analysis of Water and Wastes”, EPA/600/4-79-020, 1983; or other appropriate methods. Procedures, units, and equations used in data reduction will be consistent with the analysis method.

Data Validation

The contracted laboratory will verify that the data are properly documented and filed according to chain-of-custody records, and that calculations made from raw data are correct. Results from calibration standards will be examined to ensure they are within expected ranges. Blank, duplicate, spike, standard, and QC data for each batch will be examined to ensure conformance with specified QA/QC goals.

Data Management

The sampling contractor will be responsible for tabulation, management, and statistical analysis of analytical data received from the laboratory.

4.3 Laboratory Quality Control Analyses

To monitor system performance, control samples, including blanks, duplicates, spike duplicates, analytical standards, and reference materials, will be incorporated in the operation of the laboratory facility. The laboratory selected to complete the specified analyses must submit laboratory QC data consistent with the provisions specified in this SAP. Minimum QC sampling and testing requirements follow.

Matrix Spikes

Matrix spike samples will be run at a frequency of one per sample batch, one per every 20 samples analyzed, or consistent with EPA guidance. The results from these analyses will be compared to the control limits established for precision and bias to assess whether or not the analysis is in statistical control.

Method Blanks

To monitor potential contamination in the laboratory, method blanks will be run at the frequency of one every 20 samples, or a minimum of one per sample batch, or as specified in EPA guidance. For organic analyses, blank results will be acceptable if the concentration of the target analytes in the blank are below the practical quantitation limit for each analyte. In accordance with EPA guidance (USEPA, 1988), exceptions will be made for common laboratory contaminants (methylene chloride, acetone, 2-butanone, toluene, and phthalate esters may be present at concentrations up to five times the method-specified practical quantitation limit) and the results for the blank will still be acceptable.

Matrix Spike Duplicates

Analysis of a matrix spike duplicate will be used to determine matrix-specific precision. A matrix duplicate or matrix spike duplicate will be run at the frequency of one in 20, or a minimum of one per sample batch, or as specified in EPA guidance.

4.4 Preventive Maintenance

Routine maintenance of instrumentation will be performed per manufacturer's recommendations according to standard operating procedures for each piece of equipment. Qualified instrument technicians will be consulted as required for repair, maintenance, or advice. The laboratory Quality Assurance Project Plan (QAPP) will include maintenance procedures for laboratory instrumentation.

4.5 Data Assessment Procedures and Corrective Action

Procedures for evaluating the precision, accuracy, representativeness, and comparability of laboratory test results are detailed in the EPA publications "Test Methods for Evaluating Solid Waste" and "Methods of Chemical Analysis of Water and Wastes". As an indicator of statistical control, precision and bias will be estimated by tracking spike recoveries and standard deviations of replicates. Corrective action will be taken when QC data are outside acceptable precision and accuracy values, blank concentrations exceed acceptable limits, or unanticipated changes in method detection limits are encountered. Corrective action may include recalibration of instruments with freshly prepared standards, replacement of solvents or reagents giving high blank values, additional training, or other appropriate measures.

TABLE 1

ANALYTICAL PARAMETERS
Safety-Kleen Systems, Inc. – Pasadena

1a – Detected Hazardous and Solid Waste Constituents (Table III – Corrective Action Program)

Acetone
Benzene
2-Butanone (MEK)
Chlorobenzene
Chloroethane
Chloroform
*1,2 Dichlorobenzene
1,4 Dichlorobenzene
1,1 Dichloroethane
cis-1,2-Dichloroethene
trans-1,2-Dichloroethene
Ethylbenzene
1,1,1,2-Tetrachloroethane
1,1,2,2-Tetrachloroethane
1,1,1-Trichloroethane
Trichloroethene
Toluene
Vinyl Chloride
Xylenes
Chromium
Lead

1b – Indicator Parameters (Table IIIA– Corrective Action Program)

Benzene
Chlorobenzene
1,2 Dichlorobenzene
1,4 Dichlorobenzene
cis-1,2-Dichloroethene
trans-1,2-Dichloroethene
Ethylbenzene

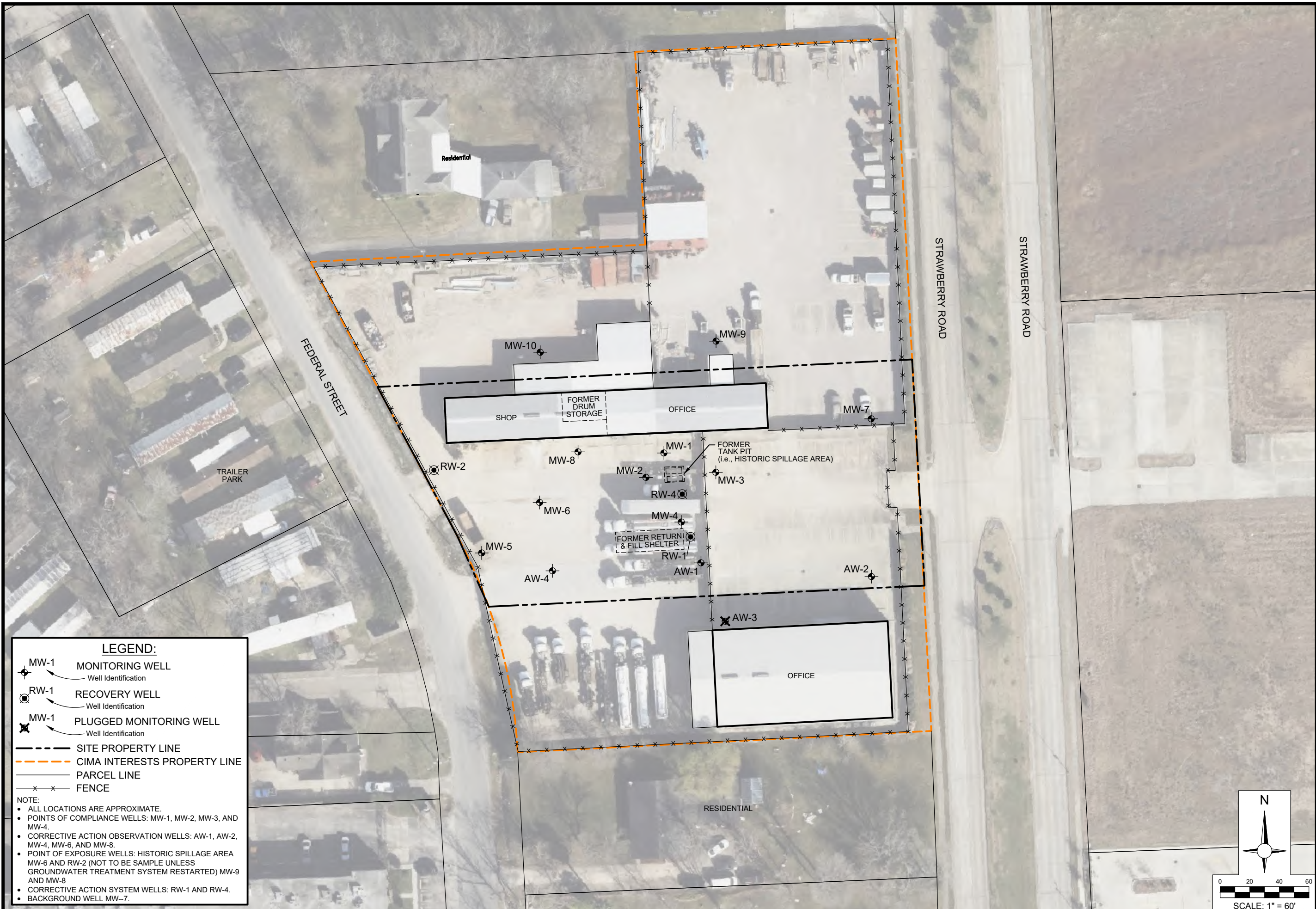
1,1,1-Trichloroethane
Toluene
Vinyl Chloride
Xylenes
1,1 Dichloroethane
Chromium
Lead

TABLE 2**ANALYTICAL METHODS, CONTAINERS, PRESERVATIVES AND HOLDING TIMES**

Safety-Kleen Systems, Inc. – Pasadena

Constituent	Analytical Method Numbers	Sample Container and Preservative	Maximum Holding Time
<i>Volatile Organic Compounds</i>			
Benzene Chlorobenzene 1,2 Dichlorobenzene 1,4 Dichlorobenzene cis-1,2-Dichloroethene trans-1,2-Dichloroethene Ethylbenzene 1,1,1-Trichloroethane Toluene Vinyl Chloride Xylenes 1,1 Dichloroethane	EPA 8260D	(3) 40 ml glass vials, headspace free / HCl (pH<2), cool to 4°C	14 days

C:\USERS\DAVID HUGHES\ONEATLAS\DIGITAL SERVICES - FILE SERVER\2026\CAD DEPARTMENT\SAFETY KLEEN\PASADENA, TX\SKL0003-SITE DWG, FIG1



SITE MAP
SAFETY-KLEEN
3333 FEDERAL ROAD
PASADENA, TEXAS 77504

Project Number:
SKL0003

Date:
04/21/2026

Drn. By:
DH

Ckd. By:
CY

Scale:
AS SHOWN

Figure:

1

