Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: 10/31/2025
Facility Name: VLS New Braunfels
Permit or Registration No.: SWR 99200

Nature of Correspondence:
☒ Initial/New
☐ Response/Revision to TCEQ Tracking No.: _____ (from subject line of TCEQ letter regarding initial submission)

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

Table 1 - Municipal Solid Waste Correspondence

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

Table 2 - Industrial & Hazardous Waste Correspondence

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

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VLS ENVIRONMENTAL SOLUTIONS

PERMIT APPLICATION
NEW NON-HAZARDOUS INDUSTRIAL WASTE RECYLING AND PROCESSING FACILITY

VLS NEW BRAUNFELS

Physical Site Address
5350 Buffalo Ranch Drive
New Braunfels, Texas 78132

Applicant
VLS Environmental Solutions, LLC
19500 State Highway 249, Suite 440
Houston, TX 77070

Prepared by
Geosyntec Consultants, Inc.
10777 Westheimer Road, Suite 900
Houston, Texas 77042
Texas Eng Firm Reg No. 1182

Beth Ann Gross

10/16/2025

STATE OF TEXAS
BETH ANN GROSS
79864
LICENSED PROFESSIONAL ENGINEER

October 2025

Texas Commission on Environmental Quality

Permit Application
to Store or Process Industrial Nonhazardous Waste

Form Availability:

This form, along with other Industrial and Hazardous Waste documents, is available online at: https://www.tceq.texas.gov/permitting/waste_permits/ihw_permits/ihw_permit_forms.html. The number for this form is 0024. Questions may be e-mailed to ihwper@tceq.texas.gov.

1. A person (individual, corporation or other legal entity) who stores or processes industrial solid waste (except as exempted in Title 30 Texas Administrative Code Section 335.2) must obtain a permit pursuant to the Texas Water Code and the Texas Health and Safety Code, Texas Solid Waste Disposal Act. In applying to the Texas Commission on Environmental Quality, hereafter referred to as the Commission, the applicant shall follow the procedures outlined below, on the attached application form and consistent with the Rules of the Commission.

2. The original application plus three (3) copies for New, Renewal, Major Amendments and Class 3 Modification should be submitted to:

   Texas Commission on Environmental Quality
   Attention: Waste Permits Division, MC- 126
   P. O. Box 13087
   Austin, Texas 78711-3087

   The original application plus three (3) copies for Class 1, 1[1], Class 2 Modifications and Minor Amendments should be submitted to:

   Texas Commission on Environmental Quality
   Attention: Industrial and Hazardous Waste Permits Section, MC 130
   Waste Permits Division
   P. O. Box 13087
   Austin, Texas 78711-3087

   Telephone Inquiries:
   (512) 239-2335 Technical - Industrial and Hazardous Waste Permits Section, Waste Permits Division

   (512) 239-6413 Waste Identification - Registration, Review and Reporting Division

   (512) 239-0300 Fees - Financial Administration Division

3. Signature on Application (30 TAC Section 305.44): The person who signs the application form will often be the applicant himself; when another person signs on behalf of the applicant, his title or relationship to the applicant will be shown. In all cases, the person signing the form must be authorized to do so by the applicant. An application submitted by a corporation must be signed by a principal executive officer or at least the level of vice president or by his duly authorized representative, if such

representative is responsible for the overall operation of the facility. In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or the proprietor, respectively. In the case of a municipal, state, federal or other public facility, the application must be signed by a principal executive officer or a ranking elected official. A person signing an application on behalf of an applicant must provide notarized proof of authorization.

4. An application cannot be processed until all information required to properly evaluate the application has been submitted. If an application is severely lacking in detail, or if the applicant fails to submit additionally requested information in a timely manner, the application will be returned in accordance with 30 TAC Section 281.18 or Class 1 and Class 1[1] modifications may be rejected pursuant to 30 TAC 305.69(b).

5. Fees and Costs.

   a. The fee for filing an application is $100 plus $50 for the cost of required notice. Therefore, a person filing an application for an original permit or an amended permit, must submit a fee of $150. A renewal of a permit must include an additional $15 for a total fee of $165. (30 TAC Section 305.53).

   b. The applicant for a permit is required to bear the cost of publication of notice in a newspaper as prescribed by 30 TAC Section 39.5 and 39.103.

6. A person is encouraged not to commence construction of an industrial solid waste management facility until the Commission has issued a permit to authorize the management of industrial solid waste at the facility.

7. Designation of Material as confidential.

   a. The designation of material as confidential is frequently carried to excess. The Commission has a responsibility to provide a copy of each application to other review agencies and to interested persons upon request and to safeguard confidential material from becoming public knowledge. The Commission suggests that the applicant **NOT** submit confidential information as part of the permit application. However if this cannot be avoided, the Commission requests that an applicant (1) be prudent in the designation of material as confidential and (2) submit such material only when it might be essential to the staff in their development of a recommendation.

   b. Reasons of confidentiality include the concept of trade secrecy and other related legal concepts which gave a business the right to preserve confidentiality of business information to obtain or retain advantages for its right in the information. This includes authorization under 5 U.S.C. 5552(b)(4), 18 U.S.C. 1905, and special rules cited in 40 CFR 552.301-2.309.

   c. Section 381.037 of the Texas Solid Waste Disposal Act does not allow an applicant for an industrial solid waste permit to claim as confidential any record pertaining to the characteristics of the industrial solid waste.

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

8. Completing This Application:

   This permit application form has been designed to solicit specific information, with reports to be attached or inserted. A response must be made for each informational request in the application form. If an item is not applicable please state “not applicable” and explain. All information included in the application must be listed by the format of the application. For example, if an engineering report is attached to the application to fulfill the requirements of Section IV, then each subsection of the engineering report must correlate with the corresponding subsection in the application form. If

information is provided which does not correspond with the application form, the specific rule or regulation which requires submittal of the information must be cited. Each report should be attached behind the summary form or table for the report and submitted as one document with the pages sequentially numbered at the bottom. Maps, bluelines, and drawings that cannot be folded to 8-1/2" x 11" may be submitted as separate documents. Engineering plans and specifications submitted with an application must be approved and sealed by a licensed Professional Engineer, with current license and designating the Registered Engineering Firm's name and Registration Number as required by the Texas Engineering Practice Act. Geology reports, geologic maps, and geologic cross-sections submitted with an application must be approved and sealed by a licensed Professional Geologist, with current license required by the Texas Geoscience Practice Act.

9. Submittal:

The complete application should be prepared using word processing. The third copy in the submittal package should consist of paper copies or PDF files of all surveys, reports, plot plans, diagrams, P&IDs, maps, etc., and a Compact Disk (CD) of the completed application form document and tables formatted in MS Word. Files may be compressed using PKZIP Ver. 2 or a 100% compatible program. For Renewal, Amendment, and Modification applications, the MS Word files should include both a finalized version and, where available, a redline/strikeout version clearly identifying all proposed changes from the existing permit. For revised application sections and incorporated documents where redline/strikeout versions are not available, submit a detailed listing of all proposed changes to the existing permit. In addition, the submitted electronic version of the application should be easily searchable during the review process by TCEQ staff.

Electronic Versions of the Application: TCEQ will publish electronic copies of the application and associated documents online. Applicants must provide copy of the administratively complete application and technically complete application. The electronic copy provided would be the current, complete version with revisions and replacements made throughout the document and without redline/ strikeout text. TCEQ will also publish electronic versions of NOD responses online.

a. For a new permit application or renewal, submit:

   1. an original permit application plus three (3) full copies (including the electronic third copy)
   2. a check for payment of permit application fees transmitted directly to the TCEQ Financial Administration Division with a photostatic copy of the check included in the original permit application or documentation of payment by TCEQ e-Pay; and
   3. Pre-printed mailing labels of the adjacent landowners or an electronic mailing list on Compact Disk (CD) in MS Word format.

b. For major amendments to an issued waste permit, submit:

   1. an original permit application plus three (3) full copies, consisting of, at a minimum, Section I of the permit application **plus** replacement pages for the changed portions of the application that change as a result of the amendment;
   2. an explanation of why the major amendment is needed;
   3. a check for payment of permit application fees transmitted directly to the TCEQ Financial Administration Division with a photostatic copy of the check included in the permit amendment application or documentation of payment by TCEQ e-Pay ; and
   4. Pre-printed mailing labels of the adjacent landowners or an electronic mailing list on Compact Disk (CD) in MS Word format.

c. For minor amendments to an issued waste permit, submit:

   1. an original permit application plus three (3) full copies, consisting of, at a minimum, Section I of the permit application **plus** replacement pages for the changed portions of

the application that change as a result of the amendment; and
an explanation of why the minor amendment is needed; a check for payment of permit application fees transmitted directly to the TCEQ Financial Administration Division with a photostatic copy of the check included in the permit amendment application or documentation of payment by TCEQ e-Pay ; and

2. Pre-printed mailing labels of the adjacent landowners or an electronic mailing list on Compact Disk (CD) in MS Word format.

d. For Class 3 modifications to an issued waste permit, submit:

1. an original permit application plus three (3) full copies, consisting of, at a minimum, Section I of the permit application **plus** replacement pages for the changed portions of the application that change as a result of the modification;
2. a description of the exact changes to be made to the permit conditions and supporting documents referenced by the permit;
3. an explanation of why the Class 3 modification is needed;
4. evidence of the public notice mailing and publication (after the public meeting, please submit a statement that the public meeting was held within the required timeframes);
5. a check for payment of permit application fees transmitted directly to the TCEQ Financial Administration Division with a photostatic copy of the check included in the original permit modification application or documentation of payment by TCEQ e-Pay ; and
6. Pre-printed mailing labels of the adjacent landowners or an electronic mailing list on Compact Disk (CD) in MS Word format.

e. For Class 2 modifications to an issued waste permit, submit:

1. an original permit application plus three (3) full copies, consisting of, at a minimum, Section I of the permit application **plus** replacement pages for the changed portions of the application that change as a result of the modification;
2. a description of the exact changes to be made to the permit conditions and supporting documents referenced by the permit;
3. an explanation of why the Class 2 modification is needed;
4. evidence of the public notice mailing and publication (after the public meeting, please submit a statement that the public meeting was held within the required timeframes);
5. a check for payment of permit application fees transmitted directly to the TCEQ Financial Administration Division with a photostatic copy of the check included in the original permit modification application or documentation of payment by TCEQ e-Pay; and
6. Pre-printed mailing labels of the adjacent landowners or an electronic mailing list on Compact Disk (CD) in MS Word format.

f. For Class 1[1] modifications to an issued waste permit, submit:

1. an original permit application plus three (3) full copies, consisting of, at a minimum, Section I of the permit application **plus** replacement pages for the changed portions of the application that change as a result of the modification;
2. a description of the exact changes to be made to the permit conditions and supporting documents referenced by the permit;
3. an explanation of why the Class 1[1] modification is needed; and

4. a check for payment of permit application fees transmitted directly to the TCEQ Financial Administration Division with a photostatic copy of the check included in the original permit modification application or documentation of payment by TCEQ e-Pay.

g. For Class 1 modifications to an issued waste permit, submit:

1. an original permit application plus three (3) full copies, consisting of, at a minimum, Section I of the permit application **plus** replacement pages for the changed portions of the application that change as a result of the modification;
2. a description of the exact changes to be made to the permit conditions and supporting documents referenced by the permit;
3. an explanation of why the Class 1 modification is needed; and
4. a check for payment of permit application fees transmitted directly to the TCEQ Financial Administration Division with a photostatic copy of the check included in the original permit application or documentation of payment by TCEQ e-Pay.

10. Application Revisions:

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

11. Waivers:

Any request for waiver of any of the applicable requirements of this permit application must be fully documented.

12. Designation of Material as Confidential:

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

The Commission suggests that the applicant **not** submit confidential information as part of the permit application. However, if this cannot be avoided, the confidential information should be described in non-confidential terms throughout the application, cross-referenced to Section VIII: Confidential Material, and submitted as a separate Section VIII document or binder, and conspicuously marked "***CONFIDENTIAL***."

Reasons of confidentiality include the concept of trade secrecy and other related legal concepts which give a business the right to preserve confidentiality of business information to obtain or retain advantages from its right in the information.

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

13. Bilingual Notice Instructions:

For certain permit applications, public notice in an alternate language is required. If an elementary school or middle school nearest to the facility offers a bilingual program, notice may be required to be published in an alternative language. The Texas Education Code, upon which the TCEQ alternative language notice requirements are based, requires a bilingual education program for an entire school district should the requisite alternative language speaking student population exist. However, there may not be any bilingual-speaking students at a particular school within a district which is required to

offer the bilingual education program. For this reason, the requirement to publish notice in an alternative language is triggered if the nearest elementary or middle school, as part of a larger school district, is required to make a bilingual education program available to qualifying students and either the school has students enrolled at such a program on-site, or has students who attend such a program at another location to satisfy the school's obligation to provide such a program.

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

Bilingual Notice Application Form:

Bilingual notice confirmation for this application:

1. Is the school district of the elementary or middle school nearest to the facility required by the Texas Education Code to have a bilingual program? __**X**_ YES ____ NO
   (If NO, alternative language notice publication not required)

2. If YES to question 1, are students enrolled in a bilingual education program at either the elementary school or the middle school nearest to the facility? __**X**_ YES ____ NO
   (IF YES to questions 1 and 2, alternative language publication is required; If NO to question 2, then consider the next question)

3. If YES to question 1, are there students enrolled at either the elementary school or the middle school nearest to the facility who attend a bilingual education program at another location? ____ YES ____ NO
   (If Yes to questions 1 and 3, alternative language publication is required; If NO to question 3, then consider the next question)

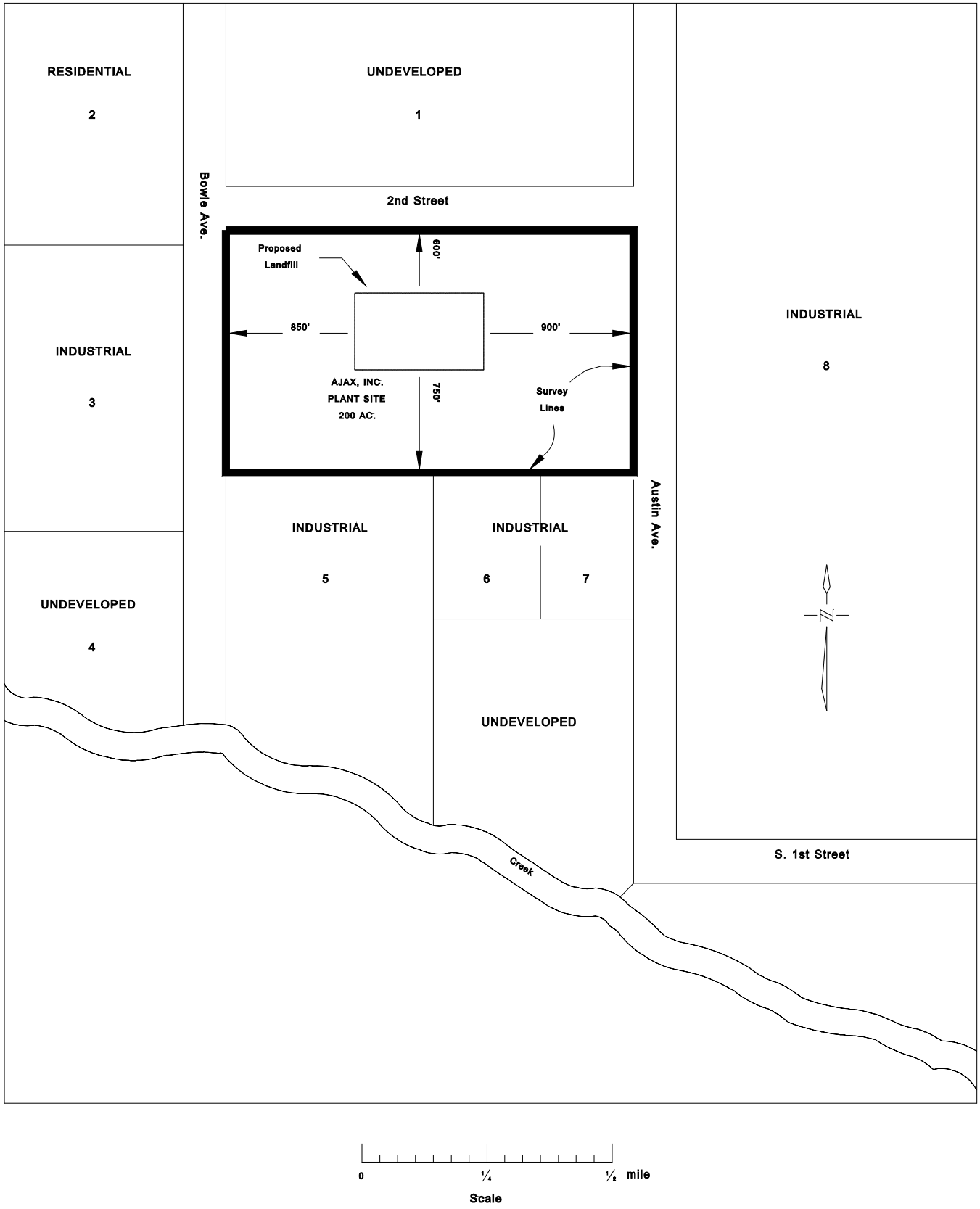
4. If YES to question 1, would either the elementary school or the middle school nearest to the facility be required to provide a bilingual education program but for the fact that it secured a waiver from this requirement, as available under 19 TAC §89.1205(g)?
   ____ YES ____ NO
   (If Yes to questions 1 and 4, alternative language publication is required; If NO to question 4, alternative language notice publication not required)

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

14. Adjacent Landowners Map and List

SAMPLE APPLICATION MAP

ALL ADJACENT LANDOWNERS SHALL BE IDENTIFIED



Landowners Cross-Referenced to Application Map

The persons identified below would be considered as affected persons.

1. MR & MRS SAMUEL L DAVIS
   11901 STAR BLVD
   AUSTIN TX 78759

2. MR & MRS EDWARD SANCHEZ
   1405 LINE ROAD
   WACO TX 76710

3. TEX-LINK CORP
   8411 N W HWY
   HOUSTON TX 77590

4. MR & MRS TED GOLDSBY
   3210 AUSTIN AVE
   WACO TX 76724

5. JAXSON BREWING CO
   4240 KNIGHTS BRIDGE
   DALLAS TX 77640

6. PLAINVIEW COMPANY
   6647 CRAIGMOUT LANE
   HOUSTON TX 77590

7. ABC CHEMICALS IN
   1212 ZIP STREET
   DALLAS TX 77640

8. BIG-C BOTTLE CO
   10024 REGIONAL BLVD
   BOVINA TX 79402

In accordance with 30 TAC 39.5(b), please also submit this list electronically, for mailing labels, in MS Word. The electronic mailing list must contain only the name, mailing address, city, state, and zip code with no reference to the lot number or lot location. The list should contain 30 names, addresses, etc. (10 per column) per page (MS WORD Avery Standard 5160 – ADDRESS template). **An electronic mailing list is being submitted with the Permit Application.**

Alternatively, the applicant may elect to submit pre-printed mailing labels of this mailing list with the application. If you wish to provide the list on printed labels, please use sheets of labels that have 30 labels (10 labels per column) to a page (for example: Avery® Easy Peel® White Address Labels for Laser Printers 5160). Please provide four complete sets of labels of the adjacent landowners list.

Table of Contents

Beth Ann Gross

10/16/2025

Attachment IV.F.1 Container Storage Area Drawings

Attachment IV.F.2 Engineering Description of Container Storage Area

Attachment IV.G.1 Mixing Tank Drawing

Attachment IV.G.3 Engineering Description of Tank Systems

Attachment VII.A.2 Closure Plan

Attachment VII.A.4 VLS Statement of Financial Mechanism for Closure

Beth Ann Gross

10/16/2025

Application for Permit to Store or Process
Industrial Nonhazardous Solid Waste

I. General Information

A. Applicant Information

Name of Applicant: **VLS Environmental Solutions, LLC**
(individual, Corporation or Other Legal Entity Name – must match the Secretary of State's database records)

Previous or former names of the facility, if applicable: **N/A**

Address: **5350 Buffalo Ranch Drive**

City: **New Braunfels** State: **Texas** Zip Code: **78132**

Telephone Number: **713-936-0960**

Street Address (if available): **5350 Buffalo Ranch Drive**

TCEQ Registration No.: **SWR 99200** EPA I.D. No.: **To Be Determined (TBD)**

Permit No. **TBD** County: **Comal**

Regulated Entity Name: **VLS New Braunfels**

Regulated Entity Reference Number: **RN112239843**

Customer Name: **VLS Environmental Solutions, LLC**

Customer Number: **CN603340787**

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

800915411
(Charter Number)

B. Facility Contact Information

1. List those persons or firms, to include a complete mailing address and telephone number, authorized to act for the applicant during the processing of the permit application.

   Bennett M.L. Sansbury, Technical Director - Waste Services
   VLS Environmental Solutions, LLC
   19500 State Highway 249, Suite 440
   Houston, TX 77070-3022
   713-936-0960

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

   Not Applicable (N/A). Application is submitted by a corporation in TX.

3. List the individual who will be responsible for causing notice to be published in the newspaper and his/her mailing address, telephone number and fax number. If e-mail is available, please provide an e-mail address.

Bennett M.L. Sansbury, Technical Director - Waste Services,
VLS Environmental Solutions, LLC.
19500 State Highway 249, Suite 440
Houston, TX 77070
713-936-0960

C. Application Location Information

For applications for new permits, renewals, major amendments and class 3 modifications, a copy of the application must be made available at a public place in the county where the facility is, or will be located for review and copying by the public (30 TAC Section 39.405(g)). Identify the public place in the county (e.g., public library, county courthouse, city hall), including the address, where the application will be made available to the public for review and copying.

New Braunfels Public Library Westside Branch
2910 S I-35 South Frontage Rd, New Braunfels, TX 78130

D. Type of Permit for Which Application is Submitted:

1. Original _____**X**_____ Permit Number _____**TBD**_____
(Will be Assigned by the Commission)

2. Amendment: Major _____ Minor _____

3. Modification: Class 1 _____ Class 1[1] _____ Class 2 _____ Class 3 _____

4. Renewal Permit: Yes _____ No __

5. Provide a brief description of the portion of the facility covered by this application, including the changes for which an amendment or modification is requested.

Permit Section	Brief Description of Proposed Change	Modification or Amendment Type	Supporting Regulatory Citation
N/A	**Application for issuance of a permit for a new commercial industrial non-hazardous waste recycling and processing facility.**	**New application**	**30 TAC 305 Subchapter C**

6. Does the application contain confidential material? Yes _____ No _**X**_

If yes, cross-reference the confidential material throughout the application to Section VIII: CONFIDENTIAL MATERIAL, and submit as a separate Section VIII document or binder conspicuously marked "CONFIDENTIAL".

E. List of Other Permits:

List any other permits, existing or pending, which pertain to pollution control activities conducted by this plant or at this location.

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

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

Government Relevant Program and/or Law	Permit No.	Agency*
13. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act	**None**	**None**
14. Dredge or fill permits under section 404 of the Clean Water Act	**None**	**None**
15. Other relevant environmental permits	**None**	**None**

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

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

F. Facility Information:

1. Name and address of operator or person in charge of facility (if different from the applicant):

   Name: **N/A, Same as Applicant.**

   Address: **19500 State Highway 249, Suite 440**

   City: **Houston** Zip Code: **77070** Phone **713-936-0960**

2. Name and address of Owner of facility (if different from applicant):

   Name: **N/A. Owner of facility is same as Applicant.**

   Address:_____

   City: _____ Zip Code _____ Phone _____

3. If facility is not owned by the applicant, a copy of the lease for use of said facility must accompany this application. (Note: The lease must address the duration and the land usage.)

   N/A. Facility is owned by Applicant.

4. Provide a brief description of the facility (*i.e.*, the nature of the business) and the activities to be permitted. 30 TAC Sections 305.45(a)(4) and (a)(5)

   VLS New Braunfels is a proposed new commercial industrial non-hazardous waste recycling and processing facility that is being designed and permitted to: (i) recycle industrial non-hazardous materials and certain similar commercial waste as alternative engineered fuel (AEF); and (ii) process

non-hazardous solid waste by consolidation, solidification, and/or blending. The waste recycling operations and the waste processing operations will be co-located in one building, but will have their own receiving, processing and storage areas. AEF will be shipped to industrial facilities (e.g., cement kilns) for use as an alternative fuel. Non-hazardous solid waste profiled for beneficial use by the generator will be either processed and shipped to industrial facilities for use as an alternative fuel or mixed with AEF and then shipped to those facilities. Processed waste not designated for use as an alternative fuel will be shipped to a permitted landfill facility for disposal.

5. Ownership Status

Private		___X___
(1)	Corporation	___X___
(2)	Partnership	_____
(3)	Proprietorship	_____
(4)	Non-profit	_____
Public		_____
(1)	Federal	_____
(2)	Military	_____
(3)	Regional	_____
(4)	Municipal	_____
Other (specify)		_____

If "Other", please specify
N/A_____

6. Are your waste management operations within the incorporated limits or extraterritorial jurisdiction of a municipality?

Yes___If so, what municipality? __**New Braunfels Extraterritorial Jurisdiction (ETJ)**_____

7. Are your industrial solid waste processing or storage operations in an area in which the governing body of the county or municipality has prohibited the processing, storage or disposal of municipal hazardous waste or industrial solid waste. Yes_____ No_**X**_

If "yes", provide a copy of the ordinance or order.

8. Is the facility located on Indian lands? Yes _____ No __**X**__

9. Is the facility within the Coastal Management Program boundary? Yes ____ No_**X**_

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

    The proposed VLS New Braunfels site is located in New Braunfels ETJ southwest of the City of New Braunfels and approximately 1.5 miles west of IH-35, Exit 183 (Solms Road). It is north of the Union Pacific Railroad and accessed from Buffalo Ranch Road on the west side of Krueger Canyon Road.

11. Coordinates of the Facility

    29 ° **39** ' **49.63** " North Latitude

    98 ° **11** ' **40.55** " West Longitude

12. Legal Description of Facility

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

    The waste management operations will occur within a 21.917-acre permit boundary located on the 32.656 acre property owned by VLS Environmental Solutions, LLC. The legal description and survey plat of permit boundary are provided in Attachment I.F.12. The full extent of the VLS Environmental Solutions, LLC property is shown on the Map of Adjacent Landowners (Drawing I.L-1 in Attachment I.L).

13. Total acreage of the facility being permitted: **21.917 acres**

14. Identify the name of the drainage basin and segment where the facility is located:

    Drainage Basin: Guadalupe River Basin. Segment: 1811A, Dry Comal Creek (unclassified water body)

G. List of Other Sites:

Provide a list of sites owned, operated, or controlled by the applicant in the State of Texas. 30 TAC Section 305.50(a)(2)

VLS Baytown, 1050 S FM 565 Rd, Baytown, TX 77523, RN105877302

VLS Hockley, 17020 Premium Drive, Hockley, TX 77447-9109, RN100215961

VLS Houston, 17360 Premium Drive, Hockley, TX 77447-8014, RN110578051

VLS Marine Services Port Arthur, 8700 Old Yacht Club Rd, Port Arthur, TX 77642-0385, RN111766002

VLS Victoria, 403 Warehouse Rd, Victoria, TX 77905-0514, RN100214535

TM Deer Park Services, 2525 Independence Rd, Deer Park, TX 77536, RN100209568

TM Corpus Christi Services, 6901A Greenwood Dr, Corpus Christi, TX 78415, RN102977535

H. Wastewater and Stormwater Disposition:

If there will be a discharge of either process water or storm water, describe the effluent route to the nearest identifiable watercourse.

N/A. Neither process water nor stormwater from waste management areas will be discharged to nearby surface waters.

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

   Yes _____ No __**X**_ (WDW Permit No(s)._____)

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

   Yes _____ No __**X**_

3. If YES, is this discharge regulated by a TPDES or TCEQ permit? **N/A**

   Yes _____ Permit No._____(TCEQ) Permit No._____(TPDES)

   No _____ Date TCEQ discharge permit application filed _____

   Date TPDES discharge permit application filed_____

4. Is the facility subject to permitting requirements in 30 TAC Section 335.2(n) for commercial industrial solid waste facilities that receive industrial solid waste for discharge to a publicly owned treatment works? Yes _____ No __**X**__

   If yes, please identify the publicly owned treatment works facility(ies) authorized to receive discharges from the facility.

   _____

I. Waste Management Units:

Please complete Table I. (Waste Management Unit List) for each waste management unit to be permitted.

See Table I.

J. Date of Operation:

What estimated date will waste management operations begin; or if operations have begun, what date did waste management operations begin at the site described by this application?

Operation of the non-hazardous waste processing side of the facility will begin after a permit is issued, construction is complete, and financial assurance has been provided for closure.

For the AEF side of the facility, the previously submitted recycled waste receiver registration was acknowledged by TCEQ on October 7, 2025.

Operation will begin after construction is complete, TCEQ has acknowledged the generator notification form (TCEQ-0525) of the sending facility, and financial assurance has been provided for closure of the outdoor area of AEF Receiving.

K. Application Map:

Submit an application map which extends at least one mile beyond the facility boundaries. The map shall be on a scale of not less than one inch equals one mile and shall include the following information: 30 TAC Section 305.45(a)(6)

See Drawings I.K-1 and I.K-2 in Attachment K.

1. The approximate boundaries of the tract of land on which the waste management activity is or will be conducted; **See Drawings I.K-1 and I.K-2 in Attachment K.**

2. The location of the areas of storage or processing; **See Drawing I.K-3 in Attachment K.**

3. The general character of the areas adjacent to the waste facility including public roads, towns and the nature of development of adjacent lands such as residential, commercial, agricultural, recreational, undeveloped, etc.; **See Drawing I.K-2 in Attachment K.**

4. The boundaries of all affected tracts of land within a reasonable distance from the area of storage, processing, or disposal; and **See Drawing I.K-2 in Attachment K.**

5. Each well, spring, and surface water body or other water in the state within the map area. **See Drawing I.K-1 in Attachment K.**

L. Information Required to Provide Public Notice

State Officials List

Provide the name and mailing address for the State Senator and State Representative in the district in which the facility is or will be located. Either local district addresses or capitol addresses are acceptable. **This list should not be included in the Adjacent Landowners List required below.** [30 TAC 39.103(b)]

State Senator:
Honorable Donna Campbell
P.O. Box 12068, Capital Station
Austin, TX 78711

State Representative:
Representative Carrie Issac
P.O. Box 12910, Capital Station
Austin, TX 78711-2910

Local Officials List

Provide the name and mailing address of the mayor and health authority of the municipality in whose territorial limits or extraterritorial jurisdiction the facility is or will be located. In addition, please provide the county judge and health authority of the county in which the facility is located. **This list should not be included in the Adjacent Landowners List required below.** [30 TAC 39.103(c)]

New Braunfels Mayor:
Neal Linnartz
550 Landa St.
New Braunfels, TX 78130

New Braunfels Senior Health Specialist:
Carl Tepe
550 Landa St.
New Braunfels, TX 78130

Comal County Judge:
Sherman Krause
100 Main Plaza
New Braunfels, Texas 78130

Comal County Public Health Director:
Cheryl Fraser, BSN, RN
1297 Church Hill, Suite 102
New Braunfels, Texas 78130

Adjacent Landowners List

Submit a map indicating the boundaries of all adjacent parcels of land, and a list (see samples in the instructions) of the names and mailing addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map, sketch, or drawing with a scale adequate enough to show the cross-referenced affected landowners. **The list should be updated prior to any required public notice. It is the applicant's responsibility to ensure that the list is up-to-date for any required public notice.** For all applications (with the exception of Class 1 and Class 11 modifications) this mailing list should be submitted on:

1. a Compact Disk (CD) using software compatible with MS Word [30 TAC 39.5(b)]; or

2. four sets of printed labels.

If the adjacent landowners list is submitted on a compact disk (CD), please label the disk with the applicant's name and permit number. Within the file stored on the disk, type the permit number and applicant's name on the top line before typing the addresses. Names and addresses must be typed in the format indicated below. This format is required by the U.S. Postal Service for machine readability. Each letter in the name and address must be capitalized, contain no punctuation, and the appropriate two-character abbreviation must be used for the state. Each entity listed must be blocked and spaced consecutively as shown below. The list is to be 30 names, addresses, etc. (10 per column) per page (MS WORD Avery Standard 5160 – ADDRESS template).

Example:

Industrial Hazardous Waste Permit No. 50000, Texas Chemical Plant

TERRY M JENKINS
RR 1 BOX 34
WACO TX 76710

MR AND MRS EDWARD PEABODY
1405 MONTAGUE LN
WACO TX 76710-1234

A list submitted on compact disk (CD) should be the only item on that disk. Please do not submit a list on a disk that includes maps or other materials submitted with your application.

If you wish to provide the list on printed labels, please use sheets of labels that have 30 labels to a page (10 labels per column) (for example: Avery® Easy Peel® White Address Labels for Laser Printers 5160). Please provide four complete sets of labels of the adjacent landowners list.

The Adjacent Landowners List and Map of Adjacent Landowners (Drawing I.L-1) are provided in Attachment I.L.

A printed copy of the adjacent landowner mailing labels is also provided in Attachment I.L, and an electronic copy of the mailing labels is being submitted with this Permit Application.

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

__**X**__Yes _____No
Bilingual Language(s):_**Spanish**_____

M. Landowner List Information Source:

The names and mailing addresses of persons identified as affected parties, item L. above, were obtained from:

Comal County Appraisal District and the City of New Braunfels Property Record

(Source, City, County, School or Water District Records or Abstract Co.)

N. TCEQ Core Data Form

The TCEQ requires that a Core Data Form (Form 10400) be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number has been issued by the TCEQ and no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ Web site at

http://www.tceq.texas.gov/permitting/central_registry/guidance.html

Please label any attachments with name of applicant.

A copy of the Core Data Form previously submitted to TCEQ when obtaining a Regulated Entity Number and Solid Waste Registration Number is provided in Attachment I.N.

O. Plain Language Summary

Complete the following form(s) as applicable, and submit with any industrial hazardous waste, or industrial solid waste, permit application that is subject to 30 Texas Administrative Code §39.405(k) [applications for a Class 3 permit modification, permit amendment, permit renewals, and for a new permit]. For more information regarding the Plain Language Summary forms, call (512) 239-5175, follow the links below, or go to the TCEQ Web site at

https://www.tceq.texas.gov/permitting/waste_permits/ihw_permits/ihw_permit_forms.html

Plan Language Summary Form - Instructions

Plain Language Form Summary - English

Plain Language Form Summary - Spanish

The English and Spanish Plain Language Summary Forms are provided in Attachment I.O.

Signature Page

I, Keith Cordesman, President
(Print or Type Name of Person Signing for Applicant) (Title)

I, _____, _____
(Print or Type Name of Owner if different from Applicant)

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: _____ Date: 10.16.25
(Applicant)

Signature: _____ Date: _____
(Owner)

To be completed by the applicant when the above statement is signed by an agent for the applicant.

I, _____ hereby designate _____ as my agent
(Print or Type Name) (Print or Type Name)

and hereby authorize said agent 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 Solid Waste Disposal Act permit. I further understand I am responsible for the contents of this application, for oral statement given by my agent in support of the application and for compliance with the terms and conditions of any permit which might be issued based upon this application.

_____
Printed or Typed Name of Applicant
or Chief Executive Officer

_____
Signature

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

Subscribe and Sworn to before me by the said

Keith Cordesman on this 16 day of October, 20 25

My commission expires on the 31 day of March, 20 28

MAGDELANA EVITA LARA
Notary ID #128954691
My Commission Expires
March 31, 2028

Magdelana Zuvadon
Notary Public in and for
Harris County, Texas

II. Facility Management

A. Security: Describe site access control, screening traffic control, and safety. 30 TAC Section 305.45(a)(8)(C)

The VLS New Braunfels facility will be located within part of a property owned by VLS Environmental Solutions, LLC. Site security measures, consisting of security fencing and access control, will be implemented at the facility to prevent inadvertent or unauthorized entry by persons or livestock.

As shown on Drawing II.A-1 in Attachment II.A, the facility is surrounded by a fence (chain link or barbed wire) along the permit boundary or outside of the permit boundary, but on adjacent property owned by VLS Environmental Solutions, LLC. The perimeter fence and the natural buffers (e.g., stormwater pond) minimize the possibility for unauthorized entry.

Access to the facility is only available via an access easement from Krueger Canyon Road (see Drawing I.L-1 in Attachment I.L) to the facility. The road in this easement has been recorded by Comal County as Buffalo Ranch Road. After reaching the facility from the easement, access into the facility requires passing through a gate with security guards or secure identification confirmation systems controlling access 24 hours/day for 7 days/week. Also, the facility building used to process AEF and non-hazardous solid waste will remain locked when there are no employees present on-site.

B. Inspection and Maintenance:

1. Complete Table II. for all of the waste management units to be permitted. Please note that inspection criteria should be provided for each component of each permitted unit (*e.g.*, tank system, tank, secondary containment area, ancillary equipment). 30 TAC Section 305.45(a)(8)(C)

See Table II.

2. Describe the inspection procedures for the units listed in Table II. 30 TAC Section 305.45(a)(8)(C)

Inspection procedures provide a mechanism to prevent and detect system malfunctions, equipment deterioration, and operator errors. At a minimum, qualified and trained facility personnel will inspect units and equipment associated with waste management (i.e., container storage area, storage tanks, and mixing tanks) on a weekly basis. Items for inspection and possible problems to evaluate during the inspections are also summarized in Table II.

Weekly inspections will be documented using weekly inspection forms. An example of the forms for the waste management units is provided in Attachment II.B.2. If deficiencies are identified during the inspections, the facility will document these problems on the inspection forms and will remedy them as appropriate.

C. Personnel: Describe the staffing pattern and qualifications of all key operating personnel. 30 TAC Section 305.50(a)(2)

The qualifications and duties of all key operating personnel at the facility are provided in Attachment II.C.1.

D. Equipment: Describe the types of equipment and minimum number of each type to be provided by the site operator in order to conduct the operation in conformance with the design and operational standards. 30 TAC Section 305.45(a)(8)(A)

The equipment plan for the facility is provided in Attachment II.D.

E. Record keeping: Describe the record keeping practices. 30 TAC Section 305.45(a)(8)(C)

The facility will maintain an electronic database of wastes accepted through the waste control screening process. This database will include: the date received; generator's name, address, and telephone number; transporter's name, address, telephone number, and permit number; type of container; number of containers; non-hazardous waste profile number; non-hazardous waste manifest number; waste screening test information if waste screening is required; a general description of the waste; weight/volume of waste accepted; and final disposition of the waste.

When waste arrives at the facility but is rejected, the facility will use the waste segregation and rejection procedures described in the Non-Hazardous Waste Analysis Plan (Attachment III.D). The facility will document the following regarding rejected wastes: generator's name, address, telephone number, and contact person; date the shipment was received; shipment type; number of containers; non-hazardous waste profile number; reasons for non-conformance; results of waste screening tests if performed; disposition of the waste; and date that the generator removed the material from the facility.

Records of waste information will be maintained for a minimum of three years from receipt of the waste in a manner such that they are readily available upon request.

F. Roads: Describe roads used for entry, exit and operations within the facility. 30 TAC Section 305.45(a)(8)(C)

Personnel and non-hazardous waste loads enter and exit the facility via Krueger Canyon Road (see Drawing II.A-1 in Attachment II.A). After turning onto Buffalo Ranch Road from Krueger Canyon, traffic proceeds west to the facility gate. After being allowed to pass through the gate, traffic moves in a counterclockwise direction around the main building at the facility (see Drawing I.K-3 in Attachment I.K). The perimeter road around the building and adjacent areas are paved with flexible base consisting of, from top to bottom: 18 inches of flexible base aggregate, 6 inches of lime-treated subgrade, and geogrid.

All transporters of waste first stop at the weigh station on the east side of the facility (see Drawing I.K-3). Then they proceed to the waste unloading docks on the south side of the building. Waste receiving, processing, and loading occurs in the southern portion of the building (see Drawing I.K-3 in Attachment I.K). Transporters carrying waste in non-bulk containers (e.g., drums, totes, and pails) back into the covered ramp for unloading. The containers will be unloaded into the container storage area once accepted by the facility. Transporters of waste in bulk containers also back into the building and unload after waste acceptance. Bulk loads are unloaded into the Mixing Tanks or the Storage Tanks. After unloading, transporters exit the facility via Buffalo Ranch Drive.

III. Waste Analysis Plan

A. Complete Table III.A. (Waste Management Information) for each waste, source, and volume of waste to be stored or processed in the facility units to be permitted. 30 TAC Section 305.45(a)(8)(C)

See Table III.A

B. For inclusion into a permit, complete Table III.B. (Wastes Managed in Permitted Units) for each waste to be managed in a permitted unit. Guidelines for the Classification & Coding of Industrial Wastes and Hazardous Wastes, TCEQ publication RG-22, contains guidance for how to properly classify and code industrial waste in accordance with 30 TAC 335, Subchapter R. 30 TAC Section 305.45(a)(8)(C)

See Table III.B

1. Applicants need not specify the complete 8-digit waste code formulas for their wastes but only the 3-digit form codes and 1-digit classification codes. This allows the applicant to specify major categories of wastes in an overall manner without having to list all the specific waste streams.

   See Table III.B

2. Are hazardous wastes defined in 30 TAC Section 335.1 managed or proposed to be managed in permitted units in accordance with 30 TAC Section 335.41(d)(8)?

   Yes _____ No __**X**__

   N/A for 2.a and 2.b below as Hazardous wastes will not accepted for management in permitted units at the facility.

   a. If yes, include the Environmental Protection Agency Waste Numbers as defined in 40 Code of Federal Regulations (CFR) Part 261 (e.g., D001, D002, D018, F039, etc.) for each hazardous waste to be managed in permitted units on Table III.B.

   b. If yes, provide documentation of compliance with 40 CFR Section 264.17(b) if management of hazardous wastes includes diluting hazardous ignitable (D001) wastes (other than the D001 High TOC Subcategory as defined in 40 CFR Section 268.40) or reactive (D003) waste to remove the characteristic before land disposal. 30 TAC Section 335.41(d)(8).

C. For inclusion into a permit, complete Table III.C. for each waste listed in Table III.B. For each waste listed in the table, please include the sampling location, the sampling method, the sample frequency, the analytical parameters (*e.g.*, pH, density, viscosity), and the analytical method for each parameter. Please note that process knowledge may be used for difficult to sample and/or measure wastes or parameters. 30 TAC Section 305.45(a)(8)(C)

See Table III.C

D. Submit a waste analysis plan which specifies procedures which will be used to inspect and if necessary, analyze each industrial solid waste received at the facility. The plan must describe methods which will be used to determine the identity of each waste managed at the facility. In addition, please specify methods for managing flammable and incompatible wastes. 30 TAC Section 305.45(a)(8)(C)

See Attachment III.D

IV. Engineering Report

The engineering report represents the conceptual basis for the storage or processing units at the industrial nonhazardous waste management facility. It should include calculations and other such engineering information as may be necessary to follow the logical development of the facility design. Plans and specifications are an integral part of the report. They should include construction procedures, materials specifications, dimensions, design capacities relative to the volume of wastes (as appropriate). Since these reports may be incorporated into any issued permit, the report should not include trade names, manufacturers, or vendors of specific materials, equipment, or services unless such information is critical to the technical adequacy of the material. Technical specifications and required performance standards are sufficient to conduct a technical review.

Submit a detailed engineering design report prepared and sealed by a professional engineer, with current license and designating the Registered Engineering Firm's name and Registration Number as required by the Texas Engineering Practice Act. Include in the report the following information shown below. 30 TAC Section 305.45(a)(8)

(Please note that in accordance with 30 TAC §305.50(a)(7), any engineering plans and specifications (*e.g.*, engineering drawings, engineering calculations) submitted as part of the permit application shall be sealed by a licensed professional engineer who is currently registered in the state of Texas).

A. Waste Management Unit Information: Complete Table IV. for each waste management unit to be permitted at the facility.

See Table IV

B. Flow Diagram/Description

Submit a process flow diagram and step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each waste listed in Table III.A.

See Attachment IV.B

The flow diagrams and/or descriptions should include the following information:

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

C. United States Geological Survey: Submit a 72-minute quadrangle map which shows the location of the facility and it uses a scale of not less than 1:24,000.

See Drawing I.K-1 in Attachment K.

D. Site Map: Submit a "site map" prepared by a registered surveyor. The map must show the approximate boundaries of the facility, denoting the areas where waste management activity is or will be conducted. The map shall also show (1) contours, using a contour interval of 5 feet if the slope is >5% and a contour interval of 2 feet if the slope is <5%, (2) plant facilities and other improvements such as fences, roads, pits, ponds, ditches, dikes, location of boreholes if applicable etc. The scale of this map should not be less than 1 inch = 200 feet.

A survey plat prepared by a registered surveyor that shows the permit boundary for the facility is provided in Attachment I.F.12. A site plan grading that shows the proposed topographic contours for the facility is provided on Figure II.A-1 in Attachment II.A. A site plan layout that shows the proposed facility and the site improvements is provided on Drawing I.K-3 in Attachment I.K.

E. Aerial Photograph: For land-based storage or treatment units (such as surface impoundments and land treatment units) submit an aerial photograph approximately 9" x 9" with a scale within a range of 1" =1667' to 1" =3334' and showing the area within at least a one-mile radius of the site boundaries. The site boundaries and actual fill areas should be marked.

N/A. Land-based storage or treatment units are not proposed for the facility.

Waste Management Units (30 TAC Section 305.45(a)(8)(A)):

F. Container Storage Areas

1. Submit engineering plans and specifications which fully depict each container storage area (CSA)(*e.g.*, CSA, secondary containment system, ancillary equipment).

See Attachment IV.F.1

2. Provide an engineering description of each CSA. Please note that the engineering description should include a description of the materials of construction, run-on prevention, overflow prevention, and the container management practices for each CSA.

See Attachment IV.F.2

G. Tank Systems

1. Submit engineering plans and specifications which fully depict each tank system (*e.g.*, tank, secondary containment system, ancillary equipment).

See Attachment IV.G.1

2. Submit piping and instrumentation drawings (P&IDs) of each tank system.

N/A. No piping or instrumentation is associated with the storage tank and mixing tank systems.

3. Provide an engineering description of each tank system. Please note that the engineering description should include a description of the materials of construction, external corrosion protection, spill prevention controls, and overfill prevention controls for each tank system.

See Attachment IV.G.3

H. Containment Buildings

N/A. Containment buildings are not proposed for the facility.

1. Submit engineering plans and specifications which fully depict each containment building.

2. Provide an engineering description of each containment building. Please note that the engineering description should include a description of the materials of construction and the waste management practices of each unit.

I. Drip Pads

N/A. Drip pads are not proposed for the facility.

1. Submit engineering plans and specifications which fully depict each drip pad. If there is a liner(s) (soil and/or artificial), leachate collection system, and/or leak detection monitoring system associated with a drip pad, include engineering drawings of these components as well.

2. Provide an engineering description of each drip pad including a description of any liner, leak detection system, leachate collection system, run-off prevention controls, and/or run-on control system that may be in place. Please note that the description should also describe the materials of construction for each component of each drip pad and the operating practices for each drip pad.

J. Waste Piles

N/A. Waste piles are not proposed for the facility.

1. Submit engineering plans and specifications which fully depict any liner(s) (soil and/or artificial), leachate collection, and/or leak detection monitoring system associated with each waste pile.

2. Provide an engineering description of any liner, leak detection system, leachate collection system, run-off prevention controls, and/or run-on control system that may be in place for each waste pile. Please note that the description should describe the materials of construction for each component of a waste pile and the operating practices for each waste pile.

K. Incinerators

N/A. Incinerators are not proposed for the facility

1. Submit engineering plans and specifications which fully depict each incinerator and any associated air pollution control equipment.

2. Submit Piping &Instrumentation Drawings (P&ID) for each incinerator and any associated air pollution control equipment (APCE).

3. Provide an engineering description of each incineration system. Each description should include the name and model number of the unit, the type of unit, a description of any APCE associated with the unit, the materials of construction for each component of the system, the types of auxiliary fuels used, the operating ranges of key parameters (*e.g.*, combustion chamber temperature, waste feed rates, air pollution control equipment parameters), and the types of stack gas monitoring equipment used (if any).

L. Miscellaneous Units

N/A. Miscellaneous units are not proposed for the facility.

1. Submit engineering plans and specifications which fully depict each miscellaneous unit. If there is a liner(s) (soil and/or artificial), leachate collection system, and/or leak detection monitoring system associated with a drip pad, please include engineering drawings of these components. If there is any APCE associated with a unit, please submit engineering drawings of that equipment as well.

2. Submit P&IDs for each miscellaneous unit, if applicable.

3. Provide an engineering description of each miscellaneous unit including a description of any APCE, liners, leak detection system, leachate collection system, run-off prevention controls, and/or run-on control system that may be associated with the unit. Please note that the description should also describe the materials of construction for each component of each miscellaneous unit and the operating practices for each unit.

M. Surface Impoundments

N/A. Surface impoundments are not proposed for the facility.

1. Submit engineering plans and specifications which fully depict each surface impoundment. The plans should include all significant features of the surface impoundment(s) and should indicate the 100-year flood zone. Cross-sectional drawing(s) detailing significant design features should be shown.

2. Describe liner specifications including type and thickness.

3. For in-place liners describe site preparation planned including scarification and compaction, and any other chemical or physical treatment to be effected.

4. For imported reworked soils, describe liner installation methodology including lift size, moisture content during compaction, compaction method, design density, and determination of hydraulic conductivity.

5. For artificial liner materials provide pertinent specifications and a description of how liner/waste compatibility has been determined. Also describe installation method.

6. For all liners describe quality control measures to be followed during liner installation.

7. Provide an engineering description of any leak detection system, leachate collection, run-off prevention controls, and/or run-on control system that may be in place for each surface impoundment.

N. Land Treatment Units

N/A. Land treatment units are not proposed for the facility.

1. Submit engineering plans and specifications which fully depict each land treatment unit. The plan should include all significant features of the land treatment unit and should indicate the 100-year flood zone.

2. Submit a performance evaluation plan describing how the degradation of waste constituents will be monitored. The plan should include the depth below ground surface of the treatment zone and management methods to be utilized within the treatment zone.

3. Describe necessary site preparation including soil importation, preparation, chemical amendments, etc.

4. Describe waste application method(s), including depth of incorporation and frequency of cultivation, equipment to be used, etc.

5. Submit an application rate table indicating the application rate of waste constituents to be applied to the treatment zone.

6. Provide an engineering description of any leachate collection, run-off prevention controls, and/or run-on control system that may be in place for each land treatment unit.

V. Geology Report (30 TAC 305.45(a)(8)(C)

(This section is applicable only to those facilities utilizing land-based storage or treatment facilities such as surface impoundments, land treatment units and waste piles.)

N/A. Land-based storage or treatment units are not proposed for the facility. Therefore, neither a Geology Report nor a Subsurface Soils Investigation Report is required.

A. Submit a Geology Report (prepared by a Texas licensed professional geoscientist) which describes the regional geology and hydrogeology in the vicinity of the solid waste management facility. The report should provide a discussion of stratigraphy, structural setting, topography, faulting, and land surface subsidence and any other active geologic processes in the vicinity of the facility. Include both geologic maps and cross-sections as necessary. The report should also identify regional aquifers and discuss the groundwater bearing and transmitting properties of subsurface units, and contain a water table contour or potentiometric surface map for the facility.

1. Indicate the location of all water-producing wells within one mile of the facility. A United States Geological Survey map may be used to show the wells. Provide uses of the water in these wells (for example: domestic, livestock watering, industrial, agricultural, etc.)

2. Provide an analysis of ground water at the waste management site.

B. Submit a Subsurface Soils Investigative Report which is sufficiently detailed to establish the soil conditions in the vicinity of the waste management facility. The applicant should consult TCEQ technical guidelines to determine the recommended number of borings, location and depth of borings, and frequency of engineering classification tests. Such investigation should be conducted in accordance with recognized subsurface soils investigation practices. The report should at a minimum contain the following information:

1. The logs of borings performed at the waste management area. All borings must be conducted in accordance with established field exploration methods. Investigation procedures should be discussed in the report. A sufficient number of borings should be performed to establish subsurface stratigraphy and to identify and allow assessment of potential pathways for pollution migration. Borings must be sufficiently deep to allow identification of the uppermost aquifer and underlying hydraulically interconnected aquifers. Boring logs should include a detailed description of materials encountered including any discontinuities such as fractures, fissures, slickensides, lenses or seams. The hollow stem auger boring method is recommended in those instances where an accurate determination of initial water levels is important. A key explaining both the symbols used on the boring logs and the classification terminology for soil type, consistency, and structure should be provided.

2. Complete Table V. and provide in the report data which describes the geotechnical properties of the subsurface soil materials. All laboratory and field tests must be performed in accordance with recognized procedures. A brief discussion of test procedures should be included. All major strata encountered during the field investigation phase should be characterized with regard to: Unified Soil Classification, moisture content, percent less than number 200 sieve, Atterberg limits (liquid limit, plastic limit, and plasticity index), and coefficient of permeability. Field permeability tests should be used to determine the coefficient of permeability of sand or silt units and should also be used to supplement laboratory tests for more clay-rich soils. In addition, particle size distribution and relative

density based upon penetration resistance should be determined for coarse-grained soils. For fine-grained soils the following parameters should also be determined: cohesive shear strength based upon either penetrometer or unconfined compression tests, dry unit weight, and degree of saturation(s). For the major soil strata encountered, the maximum, minimum, and average for each of these variables should be compiled.

3. Coefficient of permeability in units of cm/sec should be determined for any in-place or constructed soil liners to be used to control waste migration. Separate values shall be determined with ground water from the site and waste or leachate from waste as test fluids. A description of testing methods is required.

4. For land treatment units, provide a description of the surficial soils at the site which includes:

   (a) The name and description of the soil series at the site;

   (b) Important physical properties of the series such as depth, permeability, available water capacity, soil pH, and erosion factors;

   (c) Engineering properties and classifications such as USDA texture, Unified Soil Classification, size gradation, and Atterberg limits (liquid limit, plastic limit, and plasticity index); and

   (d) The cation exchange capacity (CEC) of the soil(s) expressed in units of meq/100g.

   Much of this information may be obtained by consulting the county soil survey published by the United States Department of Agriculture, Soil Conservation Service. If available, a copy of an aerial photograph showing soil series units on the land treatment area should be provided.

   If an aerial photograph is not available, include a soil series map as an attachment to this subsurface soils investigation report.

VI. Ground and Surface Water Protection (30 TAC 305.45(a)(8)(C)

A. Submit a ground and surface water protection plan drawn to scale consisting of a sheet reflecting locations and typical sections of levees, dikes, liners, drainage channels, culverts, curbs, holding ponds, storm sewers, leachate collections systems and all other units relating to protection of the site from contact with ground and surface water. Adequacy of provisions for safe passage of any internal or adjacent external floodwaters should be reflected here. Cross-sections of levees should be shown tied into contours.

All stormwater run-off at the site will be sloped to drain to Channel A (west side of the Waste Processing Building) or Channel B (east side of the Waste Processing Building), which convey run-off to the detention pond northwest of the main facility building. The pond discharges water into the floodplain of Dry Comal Creek (see Drawing II.A-1 in Attachment II.A).

All non-hazardous wastes brought to the facility will be in smaller non-bulk containers (e.g., drums) that are not leaking or larger bulk containers (e.g., roll-off boxes, tanker trucks) that unload wastes directly into the storage tank or the mixing tank. Rigid base pavement (7 inches of concrete, 6 inches of flexible base aggregate, and 6-inches of lime-treated subgrade) is used in waste receiving and operational areas adjacent to the facility to provide a sufficient foundation to support unloading and operational activities and a barrier between the ground

and any potential spills or releases (see Drawing I.K-3 in Attachment I.K). Additionally, the covered concrete ramp on the south side of the facility building that is used for unloading of non-bulk containers is sloped towards a floor trench drain and has curbing to prevent any potential releases from exiting the concrete-lined area.

All waste processing operations occur within the fully enclosed non-hazardous waste processing side of the building. This area has a concrete slab floor and a 6-inch (minimum) high curb to prevent run-off and for overflow protection. The Container Storage Area (CSA) is sloped towards the in-ground Mixing Tanks. Any potential releases from the CSA will be collected within the Mixing Tanks via floor trench drains. The Mixing Tanks are designed with a 1-inch steel plate liner and underlying 1-foot thick reinforced concrete foundation and secondary containment.

The Storage Tanks will be double walled frac tanks (providing secondary containment) and located on a concrete frac pad. The Storage Tanks and frac pad will be uncovered, but the pad includes a perimeter containment wall that provides additional containment.

In the event any leaks are detected (via weekly inspections/observations), any potential releases from the CSA will be collected within the Mixing Tanks via floor trench drains. No incompatible wastes will be stored in the CSA, so there will be no concern about wastes mixing if a release should happen. If leaks are observed from the Mixing Tanks and/or Storage Tanks, the leaking unit will be taken out of service for further inspection and/or repairs.

B. Submit a subsurface monitoring plan including descriptions of the location, operation, construction and installation of each monitoring device, subsurface zone to be monitored, constituents to be analyzed, analytical method to be employed, frequency of sampling and how a release from the waste management unit will be determined. Include logs of borings performed.

N/A. Land-based storage or treatment units are not proposed for the facility. Therefore, neither Groundwater Monitoring nor Unsaturated Zone Monitoring are required.

1. Groundwater Monitoring (This section may apply only to those facilities utilizing land-based storage or treatment facilities such as surface impoundments, land treatment units and waste piles.)

N/A. Land-based storage or treatment units are not proposed for the facility. Therefore, Groundwater Monitoring is not required.

(a) For inclusion into a permit, complete Table VI.A. for each unit to be monitored, to specify any proposed monitoring well system.

(b) For inclusion into a permit, for each unit to be monitored, complete Table VI.B. to specify the following:

(1) the suite of waste specific parameters (indicator parameters, waste constituents, or reaction products) which will be analyzed at each sampling event for each well or group of wells. These parameters must provide a reliable indication of the presence of hazardous constituents in the ground water;

(2) the sampling frequencies and calendar intervals (*e.g.*, monthly; quarterly within the second 30 days of each quarter; semiannually within the first 30 days of the 2nd and 4th quarters, etc.);

(3) the analytical method and the achievable detection limit of the sample preparation and analysis methods for the selected parameters. This detection limit will represent the capability of the sampling and analysis to reliably and accurately determine the presence of the selected parameters in the sample; and

(4) the concentration limit which will be the basis for determining whether a release has occurred from the waste management unit/area.

2. Unsaturated Zone Monitoring (This section may apply to facilities which contain land treatment units):

N/A. Land treatment units are not proposed for the facility. Therefore, Unsaturated Zone Monitoring is not required.

(a) List all hazardous constituents that have been or will be monitored.

(1) Current parameters

(2) Proposed parameters

(b) Number of soil-pore liquid sampling points

(1) Depth of sampling points

(2) Equipment used for soil pore liquid monitoring

(c) Number of soil core sampling points

(1) Depth of soil core sampling points

(2) Indicate on a facility map locations of all sampling points.

C. Climate

1. Describe regional climatic conditions

The climate of Comal County is characterized as humid subtropical, with hot and humid summers and mild winters.

(a) Indicate the magnitudes, in inches, of the following storm events. **(Values from NOAA Precipitation Frequency Data Server** https://hdsc.nws.noaa.gov/pfds/)

(b) **12.7”**

(c) 50-yr./24-hr. **10.6”**

(d) 25-yr./24-hr. **8.78”**

2. Indicate the average monthly and annual rainfall for the area.

From the Texas Waste Development Board precipitation and lake evaporation data statistics for gridded quadrangles across Texas (https://waterfortexas.org/lake-evaporation-rainfall), the average monthly and annual precipitation rates in the area (i.e., quadrangle 809) from January 1940 to December 2024 are 2.58 inches and 30.99 inches, respectively. The highest average monthly precipitation rates occurs in spring months and early fall (i.e., 2.65 inches in April, 3.96 inches in May, 3.57 inches in September, and 3.32 inches in October), and the lowest average monthly precipitation rates occur in the winter months (i.e., 1.80 to 1.93 inches in December, January, and February).

3. Is the facility located within a 100-year flood zone?

   No, See Attachment II.A

4. Is the facility located within a coastal surge zone?

   No

5. Indicate the average monthly and annual evaporation rate for the area.

   From the Texas Waste Development Board precipitation and lake evaporation data statistics for gridded quadrangles across Texas (https://waterfortexas.org/lake-evaporation-rainfall), the average monthly and annual evaporation rates in the area (i.e., quadrangle 809) from January 1940 to December 2024 are 4.46 inches and 53.53 inches, respectively. The highest average monthly evaporation rates occurs in summer months when temperatures are highest (i.e., 7.31 inches in July and 7.03 inches in August), and the lowest average monthly evaporation rates occur in the winter months when temperatures are lowest (i.e., 2.18 inches in December and 2.17 inches in January).

D. Explain how rainfall runoff and any other wastewaters within the boundary of the facility are controlled to prevent pollution of ground and surface waters in the area during construction and operation of the units.

The Mixing Tanks and Container Storage Area (CSA) will be located within the covered Waste Processing Building and will not be exposed to rainfall or run-on. Further, the Waste Processing Building will have 6-inch high curbing all the way around it to prevent run-off from the building. The covered concrete ramp used for unloading containers is covered and sloped towards a self-contained floor drain, which will be emptied in a timely manner if a release should occur. The covered concrete ramp also has a 24-inch wide rolled curb with 4-inch high curbing on the south side to prevent run-off from entering the ramp. A 6-inch high curb borders the covered concrete ramp to the west and east. The north side of the covered concrete ramp is bordered by the CSA staging area.

The Storage Tanks and frac pad will be uncovered but will sloped from south to north and have a perimeter containment. At the north, the frac pad is bordered by a 2-ft high elevated pump pad; a 6-inch high rolled curb bounds the south; the sawdust bin bounds the east; and the west side of the frac pad is bounded by a 1.5-ft (minimum) high containment wall.

All non-contact run-off at the Facility will be sloped to drain to two collection channels which convey run-off to the detention pond located northwest of the

Waste Processing Building that discharges water into the floodplain of Dry Comal Creek (see Drawing II.A-1 in Attachment II.A).

E. Is it possible for surface waters originating outside the facility to enter said facility? Give explanation of answer.

No, as shown on Drawing II.A-1 in Attachment II.A, the proposed permit boundary of the Facility is not located within the regulatory floodway (Federal Emergency Management Agency [FEMA] FIRM 48091C0440F, effective September 2, 2009). The Facility is located in Flood Hazard Zone X (unshaded), which FEMA defines as an area of minimal flood hazard. While the base flood elevation in the floodway near the Facility is approximately 667 feet the Waste Processing Building is located on an elevated platform of fill and has a finished floor elevation of 673 feet. See above for run-on control details.

F. If an accidental discharge did occur, trace the route which the water would follow (for example: into an unnamed creek adjacent to the facility; thence into Red Creek; thence into the Trinity River).

In the unlikely event of a catastrophic failure that resulted in liquid non-hazardous waste migrating off-site, it would move into Dry Comal Creek; thence into Comal River; thence into the Guadalupe River.

VII. Closure and Post-Closure Plans

The applicant must close the facility in a manner that minimizes need for further maintenance and controls, or eliminates, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated rainfall, or waste decomposition products to the ground water, or surface waters, or to the atmosphere.

A. Closure

1. Complete Table VII.A. for each waste management unit to be permitted and list the possible methods of decontamination, and possible methods of disposal of wastes and waste residues, generated during unit closure. (30 TAC Section 335.8)

See Table VII.A

2. Submit a closure plan for the facility which includes each permitted waste management unit. The closure plan should describe in detail the procedures (*e.g.*, disposition of wastes, decontamination procedures, procedures for soil sampling and analysis) to be followed and the materials and manpower to be used in accomplishing final closure of the waste management facility. If the facility contains land based units (*e.g.*, land treatment units), please ensure the closure plan includes information on such items as: type, volume and source of cover material; dismantling/demolition of structures and other improvements; ultimate disposition of liquid wastes; final grading/contouring of the facility; topsoil, seed, fertilizer and irrigation necessary to establish cover, where applicable; equipment and manpower (man hours) to accomplish closure. Please include a schedule or timetable for closure of the facility. (30 TAC Section 335.8)

See Attachment VII.A.2

3. Complete Table VII.B. by providing an itemized closure cost estimate (*e.g.*, cost for any decontamination, costs for soil and/or rinsate sampling, cost for analyses) for each permitted waste management unit at the facility. (30 TAC Section 335.8) Closure cost estimates should be prepared on a "worst case" basis (cost of closure by a third party in the

event of sudden or total abandonment of the management facility by the operator). The cost estimate must include the cost of closure at the point in the facilities operating life when the extent and manner of its operation would make closure the most expensive. Please consult TCEQ Technical Guideline No. 10, Closure and Post-Closure Cost Estimates, for details and assumptions in calculating closure costs.

See Table VII.B

Complete Table VII.C. by providing a closure cost estimate, in current dollars, for final closure of each permitted unit at the facility. Please refer to 30 TAC Chapter 37, Subchapter P, for the financial assurance requirements for closure and provide a signed statement from an authorized signatory per 30 TAC 305.44 regarding how the owner or operator will comply with this provision.

See Table VII.C. A signed statement from an authorized signatory indicating the financial mechanism VLS will use to comply with the financial assurance requirements for closure is provided in Attachment VII.A.4.

4. If the financial mechanism(s) has been obtained, please provide a copy of the mechanism(s) to the TCEQ.

   A financial assurance mechanism is not provided as a financial mechanism has not yet been obtained.

5. Submit a contingent closure plan for each permitted unit in the case where a release from the unit to the environment has occurred. (30 TAC Chapter 350)

   N/A. The facility has not yet been constructed and a release has not occurred.

B. Post-closure (This section may apply to land-based units such as surface impoundments and land treatment units). Provide a post-closure care plan that includes:

N/A. No land-based units are proposed for the facility in this Permit Application. Therefore, a post-closure plan is not required.

1. any maintenance or monitoring of waste containment systems;
2. any monitoring or reporting of groundwater monitoring systems;
3. any monitoring or reporting of unsaturated zone monitoring systems;
4. any security measures; and/or
5. a discussion of the future use of the land.

VIII. Confidential Material

Any information requested in the previous Sections I. through VII. of this application which is deemed confidential shall be provided in this section as a separate collective document and clearly labeled CONFIDENTIAL.

N/A. This Permit Application does not include Confidential Information.

Table I. - Waste Management Unit List

Waste Management Unit	TCEQ N.O.R. Unit #	Function(s) of Unit (storage/processing)	Design Capacity[1]
Container Storage Area (proposed)	001	**Storage**: Storage of containerized liquid, sludge, and solid wastes before processing	1296 55-gallon container equivalents for a total of 71,280 gallons
Storage Tank 1 (proposed)	TBD	**Storage:** Storage of bulk liquid wastes before processing	20,000 gallons
Storage Tank 2 (proposed)	TBD	**Storage:** Storage of bulk liquid wastes before processing	20,000 gallons
Mixing Tank 1 (proposed)	TBD	**Processing**: Mixing and solidification of waste materials; mixing of Alternative Engineered Fuels (AEF) and wastes profiled for beneficial use	16,000 gallons
Mixing Tank 2 (proposed)	TBD	**Processing:** Mixing and solidification of waste materials; mixing of AEF and wastes profiled for beneficial use	16,000 gallons

[1]Cubic yards, gallons, pounds, gallons/minute, pounds/hour, BTUs/hour, etc.

Table II. - Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
Container Storage Area (including secondary containment)	Cracks, deterioration, spills/leakage	Visual inspection weekly
Containers in Container Storage Area	Insufficient aisle space, open, not labeled, deterioration, leaking	Visual inspection weekly
Mixing Tanks (including tanks and secondary containment)	Cracking, deterioration, spills/leakage	Visual inspection weekly
Storage Tanks (including frac tanks and frac pad)	Cracking, deterioration, signs of spills/leakage, accumulation of precipitation in frac pad area	Visual inspection weekly; visual inspection after storm events
Facility Gates and Fencing	Deterioration, breaks, damage	Visual inspection weekly
Fire Prevention Equipment	Deterioration, damage, expired chemicals	Visual inspection monthly
Safety Equipment	Deterioration, damage, expired or missing equipment	Visual inspection weekly
Facility Stormwater Drainage and Structures	Damage, erosion	Visual inspection after storm events

Table III.A. - Waste Management Information

Waste	Source	Volume (tons/year)
Non-hazardous Wastes (Solids, Sludges, and Liquids)	Offsite Generators	Approximately 195,000 tons/year

Table III.B. - Wastes Managed In Permitted Units

No.	Waste	Physical Form (e.g., solid, liquid, sludge)	TCEQ Waste Form Codes and Classification Codes
1	Inorganic Liquids	Liquid	101-199 (1,2)
2	Organic Liquids	Liquid	201-299[1] (1,2)
3	Inorganic Solids	Solid	301-393[2] (1,2)
4	Organic Solids	Solid	401-493 (1,2)
5	Inorganic Sludges	Sludge	501-597[3] (1,2)
6	Organic Sludges	Sludge	601-697 (1,2)

Notes:
*Form Code (Classification Code). No hazardous wastes will be accepted.
(1) Excludes form codes 297 and 298 (PCB containing nonhazardous liquids)
(2) Excludes form code 311 (Asbestos solids and debris)
(3) Excludes form code 515 (Asbestos slurry or sludge)

Table III.C. - Sampling and Analytical Methods

Waste No.[1]	Sampling Location	Sampling Method	Frequency	Parameter[2]	Test Method[3]
1-6	Grab sample from received container (e.g., drum, roll-off box, etc.)	Coliwasa, bottle, dipper, pump, scoop, shovel, auger, trier	Every received waste with an estimated aqueous liquid fraction of more than 10%	pH	SW-846 Method 9040C
2,4,6	See above	See above	Every received waste with an estimated aqueous liquid fraction of more than 10%	Organic Vapor Analyzer (OVA) Screening	Container exhibiting an OVA reading of greater than 50 ppm above background readings will be considered to have organic vapors present.
1,2,5,6	See above	See above	All containers with a ≥ 50 ppm OVA reading and a free liquid layer	Flashpoint	ASTM D-93-15a, D-3278-96 SW-846 1010A, 1020B
2,4,6	See above	See above	As needed	Volatile organic constituents	SW-846 8260B, 8021B
2,4,6	See above	See above	As needed	Semi-volatile and other organic constituents	SW-846 8270D, 8275A
1-6	See above	See above	As needed	Metals content	SW-846 6010D, 6020B, EPA Method 200.7
1-6	See above	See above	As needed	PCB content	SW-846 8275A
1-6	See above	See above	As needed	Total petroleum hydrocarbons content	TCEQ1005, modified SW-846 8015C, SW846 9074
1,2,5,6	See above	See above	As needed	Cyanide	SW-846 Chapter 7, Section 7.3.3, SW-846 9010C, 9012B, 9013A, 9014

1,2	See above	See above	As needed	Halogen content	EPA Method 300.0, ASTM D4327-11, SW-846 9022
1,2,5,6	See above	See above	As needed	Hydrogen Sulfide	SW-846 Chapter 7, Section 7.3.4, SW-846 9034
1,2	See above	See above	As needed	Reactivity	SW-846 Chapter 7, Section 7.3, ASTM E537-12, ASTM E2012-06(2012)
1-6	See above	See above	As needed	Toxicity Characteristic Leaching Procedure (TCLP) determination	SW-846 1311 coupled with other analyses as listed above

(1) From first column of Table III.B.
(2) Parameter measured depends on the waste type.
(3) Or an updated version of the method listed, as described in "Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods" (EPA-SW-846), "Methods for Chemical Analysis of Water and Wastes"(EPA-600/4-79/020), "Standard Methods for the Examination of Water and Wastewater," or American Society for Testing and Materials (ASTM) methods.

Table IV. - Waste Management Unit Information

Permit Unit No.	Waste Management Unit	TCEQ N.O.R. No.	Waste Nos.[1] Managed in Unit	Function(s) of Unit (storage/processing)	Rated Capacity of Unit
1	Container Storage Area (proposed)	001	1-6	Storage	71,280 gal
2	Storage Tank 1 (proposed)	TBD	1-2	Storage	20,000 gal
3	Storage Tank 2 (proposed)	TBD	1-2	Storage	20,000 gal
4	Mixing Tank 1 (proposed)	TBD	1-6	Processing	16,000 gal
5	Mixing Tank 2 (proposed)	TBD	1-6	Processing	16,000 gal

[1]from first column of Table III.B.

Table V. - Waste Management Area Subsurface Conditions

N/A. Land-based storage or treatment units are not proposed for the facility. Therefore, a neither a Geology Report nor a Subsurface Soils Investigation Report is required.

Boring Number	Depth Below Grade	Stratum	USC Symbol	Liquid Limit	Plasticity Index	Percent Passing #200 Sieve	Permeability	Percent Porosity

Maximum depth:

_____feet below grade

_____feet above MSL

Table VI.A. - Unit Groundwater Detection Monitoring System

N/A. Land-based storage or treatment units are not proposed for the facility. Therefore, groundwater monitoring is not required.

For each unit/area which requires groundwater monitoring, specify the number and type of wells which will comprise the groundwater monitoring system for the unit/area. Prepare additional tables as necessary.

Waste Management Unit/Area Name[1]

Well Number(s)						
Hydrogeologic Unit Monitored						
Type (e.g.,. point of compliance, background, observation, etc.)						
Up or Down Gradient						
Casing Diameter and Material						
Screen Diameter and Material						
Screen Slot Size (in.)						
Top of Casing Elevation (ft, MSL)						
Grade or Surface Elevation (ft, MSL)						
Well Depth (ft,)						
Screen Interval, From(ft) To(ft)						
Facility Coordinates (e.g., lat/long or company coordinates)						

[1]From Tables in Section V.

Table VI.B. - Groundwater Sample Analysis

N/A. Land-based storage or treatment units are not proposed for the facility. Therefore, groundwater monitoring is not required.

For each well or group of wells, specify the suite of parameters for which groundwater samples will be analyzed.

Well No(s).

Parameter	Sampling Frequency	Analytical Method	Detection Limits	Concentration Limits[1]

[1] The concentration limit is the basis for determining whether a release has occurred from the waste management unit/area.

Table VII.A. - Unit Closure

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

Equipment of HWM Unit	Possible Methods of Decontamination[1]	Possible Methods of Disposal [1]
Container Storage Area	High pressure water rinsing of secondary containment to remove any residues.	Off-site stabilization and disposal of containerized waste at landfill; Off-site management of rinsate via solidification and disposal or disposal well.
Storage Tanks	Flushing and high pressure water rinsing to remove any residues.	Off-site stabilization and disposal of waste at landfill; Off-site management of rinsate via solidification and disposal or disposal well.
Mixing Tanks	Flushing and high pressure water rinsing to remove any residues	Off-site stabilization and disposal of waste at landfill; Off-site management of rinsate via solidification and disposal or disposal well.

[1]Applicants may list more than one appropriate method.

Table VII.B. - Unit Closure Cost Estimate

Task	Cost
Container Storage Area (1296 55-gallon container equivalents for a total of 71,280 gallons)	
Liquid waste removal and transport to landfill (71,280 gal x $0.32/gal)	$22,810
Liquid waste stabilization and disposal (71,280 gal x $0.92/gal)	$65,578
Decontamination (decon) of secondary containment (1 day at $1,400/day lump sum)	$1,400
Decon water transport to landfill (11,900 ft2 containment: 1,190 gal x $1500/load)	$1,500
Decon water disposal (1,190 gal x $0.92/ gal)	$1,095
Verification sampling (2 samples x $500/sample)	$1,000
Inspection and Certification by Professional Engineer ($3,500 lump sum)	$3,500
Subtotal	$96,882
Contingency (10% minimum)	$9,688
Total Unit Closure Cost to Nearest $1,000 Year 2024	$107,000

Task	Cost
Storage Tanks (2 20,000-gallon tanks)	
Liquid waste removal and transport to landfill (40,000 gal x $0.32/gal)	$12,800
Liquid waste stabilization and disposal (40,000 gal x $0.92/gal)	$36,800
Tank decon, disposal of decon water, and disassembly ($5,000/tank x 2 tanks)	$10,000
Verification sampling (2 samples x $500/sample x 2 tanks)	$2,000
Inspection and Certification by Professional Engineer ($3,500 lump sum x 2 tanks)	$7,000
Subtotal	$68,600
Contingency (10% minimum)	$6,860
Total Unit Closure Cost to Nearest $1,000 Year 2024	$75,000
Total Unit Closure Cost to Nearest $1,000 / Storage Tank Year 2024	$38,000

Task	Cost
Mixing Tanks (2 16,000-gallon tanks)	
Liquid waste removal and transport to landfill (32,000 gal x $0.32/gal)	$10,240
Liquid waste disposal (32,000 gal x $0.92/gal)	$29,440
Decontamination (decon) of tanks ($1,500/tank)	$3,000
Decon water transport to landfill (3,200 gal x $1,500/load)	$1,500
Decon water disposal (3,200 gal x $0.32/ gal)	$1,024
Verification sampling (2 samples x $500/sample x 2 tanks)	$2,000
Inspection and Certification by Professional Engineer ($4,000 lump sum x 2 tanks)	$8,000
Subtotal	$55,204
Contingency (10% minimum)	$5,520
Total Unit Closure Cost to Nearest $1,000 Year 2024	$61,000
Total Unit Closure Cost to Nearest $1,000 / Mixing Tank Year 2024	$31,000

Notes:
The cost estimate for closure of the non-hazardous waste management units at the VLS New Braunfels facility presented in Table VII.B was developed in general accordance with Texas Commission on Environmental Quality (TCEQ) Draft Technical Guideline (TG) No. 10, "Closure and Post- Closure Care Cost Estimates", dated December 2017. The estimate is based upon the following assumptions:

Table VII.B. - Unit Closure Cost Estimate (continued)

- The estimate is in 2024 dollars.
- The estimate is based on industrial non-hazardous waste unit closure when the Facility is at its maximum extent of operations and waste inventory. Per TCEQ (2024), it is also assumed that the Facility has been abandoned with no operable on-site equipment. Further, estimates of the salvage value from the sale of Facility assets are not included.
- All wastes in the Container Storage Area, Storage Tanks, and Mixing Tanks are Class 1 wastes that require stabilization before disposal at a municipal solid waste landfill permitted to accept Class 1 waste.
- Secondary containment areas will generate 0.1 gallons/ft2 of area during decontamination.
- Rinsate water will be stabilized and disposed at a municipal solid waste landfill permitted to accept Class 1 waste for solidification and disposal.
- No escape of waste outside of secondary containment areas has occurred.
- Tank systems are well maintained with no leakage or spillage.
- Closure activities will be conducted by a third party and will be documented in a closure report prepared by a third party.
- The estimate includes a 10% contingency factor.
- The unit costs for each line item included in Table VII.B are based on Geosyntec's experience with similar closure projects and unit prices from vendors:
    - Waste hauling to the Covel Gardens Landfill in San Antonio, Texas by GFL Environmental,
    - Stabilization and disposal of waste and rinsate water at the Covel Gardens Landfill, and
    - Tank decontamination and removal, concrete decontamination by EIG.

Table VII.C. - Permitted Unit Closure Cost Summary

Existing Unit Closure Cost Estimate

Unit	Cost
N/A	
Total Existing Unit Closure Cost Estimate (2024 dollars)	

Proposed Unit Closure Cost Estimate

Unit	Cost
Container Storage Area	$107,000
Storage Tanks (2)	$75,000
Mixing Tanks (2)	$61,000
Total Proposed Unit Closure Cost Estimate (2024 dollars)	$243,000

ATTACHMENT I.F.12

Legal Description and Survey Plat

HMT
ENGINEERING & SURVEYING
290 S. Castell Avenue, Ste. 100
New Braunfels, TX 78130
(830) 625-8555
TBPE-FIRM F-10961
TBPLS FIRM 10153600

METES AND BOUNDS DESCRIPTION
FOR A 21.917 ACRE TRACT OF LAND
EXHIBIT "A"

Being a 21.917 acre tract of land located in the J.M. Veramendi Survey, Abstract No. 2, Comal County, Texas, being out of a called 32.656 acre tract, recorded in Document No. 202506005195 of the Official Public Records of Comal County, Texas. Said 21.917 acre tract of land of land being more particularly described as follows:

BEGINNING at a found 1/2" iron pin with cap "MDS" in the North right-of-way line of the Union Pacific Railroad for the East corner of a called 20.682 acre tract, "Tract Two", recorded in Document No. 202406023846, Official Public Records, Comal County, Texas, same point being the South corner of said 32.656 acre tract and the South corner of the herein described tract;

THENCE departing the North right-of-way line of the Union Pacific Railroad, with the Southwest lines of said 32.656 acre tract and the Northeast line of said 20.682 acre tract, "Tract Two", N 29°10'42" W, a distance of 1170.15 feet to a found 1/2" iron pin with cap "MDS" for a corner;

THENCE crossing and severing said 32.656 acre tract N 05°41'15" W, a distance of 63.96 feet to a 3" pipe post found for an interior corner of said 32.656 acre tract and a called 93.889 acre tract, Tract A, recorded in Document No. 202406013121, Official Public Records, Comal County, Texas;

THENCE along the common line of said Tract A and said 32.656 acre tract, N 11°27'20" E, a distance of 331.08 feet to a point for a corner;

THENCE crossing and severing said 32.656 acre tract, the following three (3) calls:

1. N 80°45'47" E, a distance of 160.72 feet to a point for a corner;
2. N 58°00'27" E, a distance of 107.59 feet to a point for a corner;
3. S 82°54'51" E, a distance of 192.75 feet to a point for a corner lying along the Northeast line of said 32.656 acre tract the Southwest line of a called 19.968 acre tract, recorded in Document No. 201306010386, Official Public Records, Comal County, Texas;

THENCE with the Southwest line of said 19.968 acre tract and the Northeast line of said 32.656 acre tract, S 30°29'06" E, a distance of 534.96 feet to a found 5/8" iron pin in concrete for the West corner of a called 14.082 acre tract, recorded in Document No. 202106039334, Official Public Records, Comal County, Texas, same point being the South corner of said 19.968 acre tract, a corner of said 32.656 acre tract, and a corner of the herein described tract;

THENCE continuing with the Southwest line of said 14.082 acre tract and the Northeast line of said 32.656 acre tract, S 30°11'41" E, a distance of 793.10 feet to a found 1/2" iron pin for the West corner of a called 0.34 of an acre tract recorded in Volume 339, Page 402, Deed Records, Comal County, Texas, same point being the South corner of said 14.082 acre tract, a corner of said 32.656 acre tract, and a corner of the herein described tract;

HMT
ENGINEERING & SURVEYING
290 S. Castell Avenue, Ste. 100
New Braunfels, TX 78130
(830) 625-8555
TBPE-FIRM F-10961
TBPLS FIRM 10153600

THENCE continuing with the Southwest line of said 0.34 of an acre tract, S 30°12'32" E, a distance of 69.53 feet to a found 1/2" iron pin with cap "Pape-Dawson" in the aforementioned North right-of-way line of the Union Pacific Railroad, for the Southwest corner of said 0.34 of an acre tract, the same point being the East corner of said 32.656 acre tract and the herein described tract;

THENCE with the North right-of-way line of the Union Pacific Railroad and the South line of said 32.656 acre tract, S 67°34'23" W, a distance of 687.34 feet to the POINT OF BEGINNING, containing 21.917 acres of land in Comal County, Texas.

NOTE: THIS PROPERTY DOES NOT HAVE FRONTAGE ON A PUBLIC ROAD. IT HAS ACCESS TO KRUEGER CANYON ROAD VIA A 1.134 ACRE ACCESS EASEMENT THROUGH THE ADJOINING 14.082 ACRE TRACT AS DESCRIBED IN DOCUMENT NO. 202406015783 OF THE OFFICIAL PUBLIC RECORD OF COMAL COUNTY, TEXAS AS SHOWN HEREON.

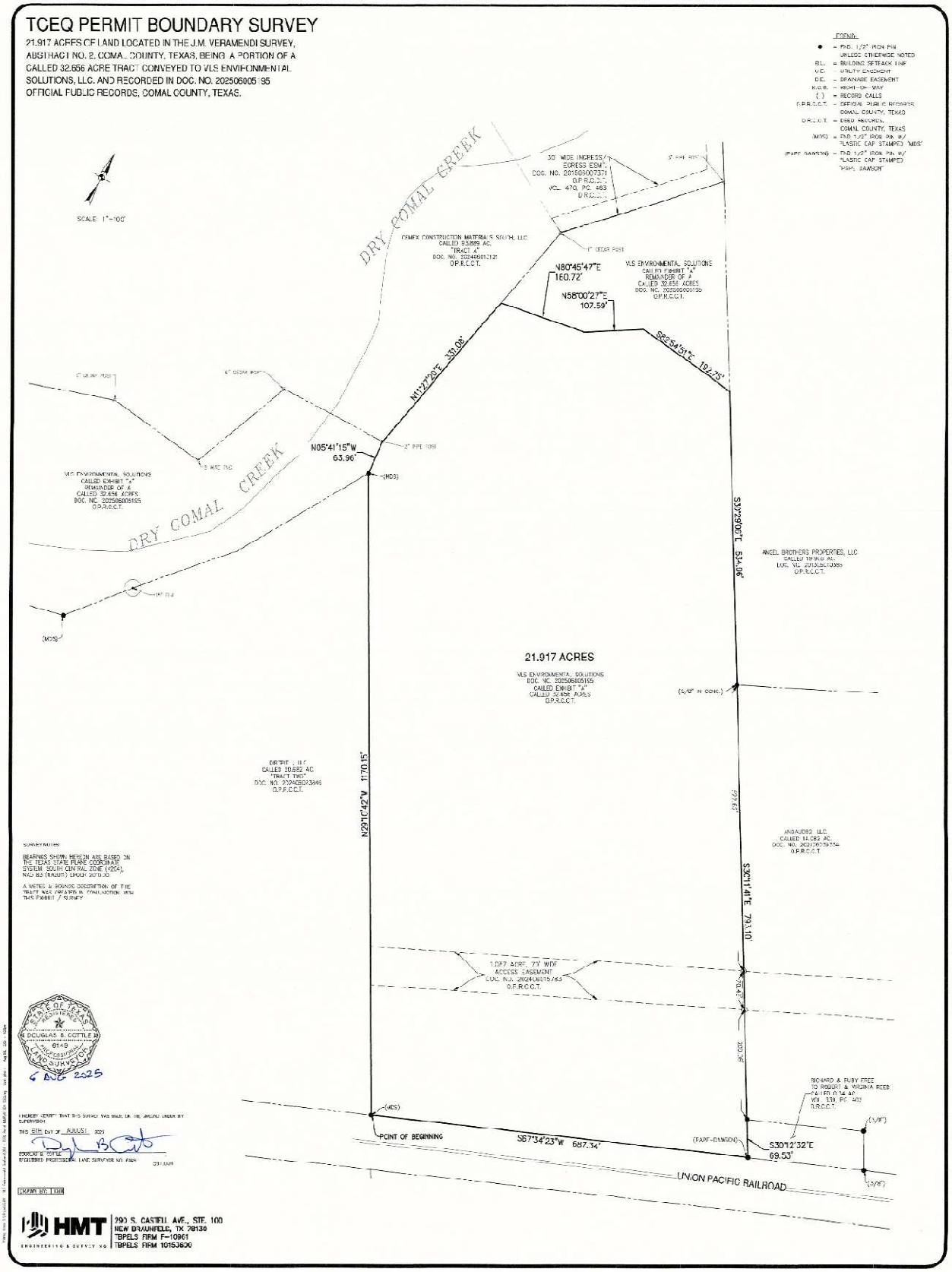
Bearings shown hereon are based on the Texas State Plane Coordinate System, South Central Zone (4204), NAD 83 (NA2011) Epoch 2010.00.

Written August 6, 2025.

Reference exhibit of said 21.917 acre tract of land prepared this same date.

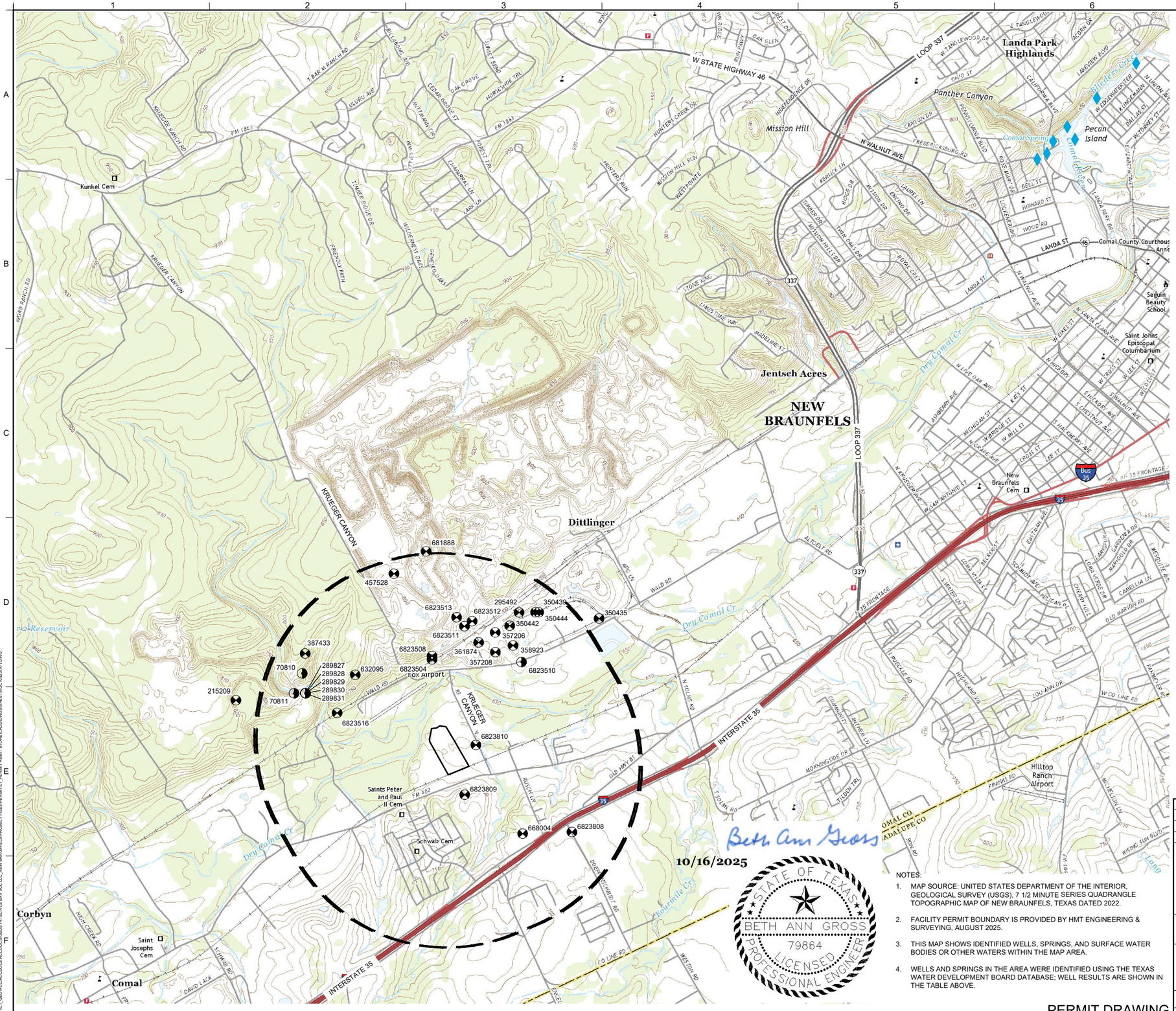
Douglas B. Cottle
Registered Professional Land Surveyor No.6149
S:\Projects\591 - VLS Environmental Solutions\004 - TCEQ Permit M&B\M&B's\21.917 AC. M&B.docx

6 AUG 2025


TCEQ PERMIT BOUNDARY SURVEY
21.917 ACRES OF LAND LOCATED IN THE J.M. VERAMENDI SURVEY, ABSTRACT NO. 2, COMAL COUNTY, TEXAS, BEING A PORTION OF A CALLED 32.656 ACRE TRACT CONVEYED TO VLS ENVIRONMENTAL SOLUTIONS, LLC. AND RECORDED IN DOC. NO. 202506005195 OFFICIAL PUBLIC RECORDS, COMAL COUNTY, TEXAS.
LEGND:
● = FND. 1/2" IRON PIN UNLESS OTHERWISE NOTED
B.L. = BUILDING SETBACK LINE
U.E. = UTILITY EASEMENT
D.E. = DRAINAGE EASEMENT
R.O.W. = RIGHT-OF-WAY
( ) = RECORD CALLS
O.P.R.C.C.T. = OFFICIAL PUBLIC RECORDS, COMAL COUNTY, TEXAS
D.R.C.C.T. = DEED RECORDS, COMAL COUNTY, TEXAS
(MDS) = FND 1/2" IRON PIN W/ "PLASTIC CAP STAMPED "MDS"
(RAPF-DAWSON) = FND 1/2" IRON PIN W/ "PLASTIC CAP STAMPED "RAPF- DAWSON"
SCALE: 1"=100'
DRY COMAL CREEK
CEMEX CONSTRUCTION MATERIALS SOUTH, LLC
CALLED 53.889 AC.
"TRACT A"
DOC. NO. 202409081212
O.P.R.C.C.T.
30' WIDE INGRESS/EGRESS ESM'T.
DOC. NO. 201509007371
O.P.R.C.C.T.
VOL. 470, PG. 463
D.R.C.C.T.
VLS ENVIRONMENTAL SOLUTIONS
CALLED EXHIBIT "A"
REMAINDER OF A
CALLED 32.656 ACRES
DOC. NO. 202506005195
O.P.R.C.C.T.
N80°45'47"E
160.72'
N58°00'27"E
107.59'
S82°34'51"E 192.75'
N11°27'29"E 331.08'
N05°41'15"W
63.96'
S33°26'00"E 514.96'
21.917 ACRES
VLS ENVIRONMENTAL SOLUTIONS
DOC. NO. 202506005195
CALLED EXHIBIT "A"
CALLED 32.656 ACRES
O.P.R.C.C.T.
ANGEL BROTHERS PROPERTIES, LLC
CALLED 19.910 AC.
DOC. NO. 202106070350
O.P.R.C.C.T.
DIRTPIT I, LLC
CALLED 20.662 AC.
TRACT TWO
DOC. NO. 2024EO03646
O.P.R.C.C.T.
N29°11'42"W 1170.15'
ANDAUREA, LLC
CALLED 14.282 AC.
DOC. NO. 202106039354
O.P.R.C.C.T.
S35°14'43"E 790.10'
1.087 ACRE, 73' WIDE ACCESS EASEMENT
DOC. NO. 202406015763
O.P.R.C.C.T.
RICHARD & RUBY FREE TO ROBERT & VIRGINIA REED
CALLED 0.14 AC.
VOL. 339, PG. 402
D.R.C.C.T.
POINT OF BEGINNING
S67°34'23"W 687.34'
S30°12'32"E
69.53'
UNION PACIFIC RAILROAD
SURVEY NOTES:
BEARINGS SHOWN HEREON ARE BASED ON THE TEXAS STATE PLANE COORDINATE SYSTEM SOUTH CENTRAL ZONE (4204), NAD 83 (2022) EPOCH 2010.00.
A METES & BOUNDS DESCRIPTION OF THE TRACT WAS PREPARED IN CONJUNCTION WITH THIS EXHIBIT / SURVEY
STATE OF TEXAS
R. DOUGLAS B. COTTLE III
6149
REGISTERED PROFESSIONAL LAND SURVEYOR
6 AUG 2025
I HEREBY CERTIFY THAT THIS SURVEY WAS MADE OR DID ABOUND UNDER MY SUPERVISION
THIS 6TH DAY OF AUGUST 2025
R. DOUGLAS B. COTTLE
REGISTERED PROFESSIONAL LAND SURVEYOR NO. 6149
DRAWN BY: TBH
HMT
ENGINEERING & SURVEYING
293 S. CASTELL AVE., STE. 100
NEW BRAUNFELS, TX 78130
TBPELS FIRM F-10961
TBPELS FIRM 10153500

ATTACHMENT I.K

Application Maps



LEGEND

- PERMIT BOUNDARY
- ONE MILE RADIUS FROM PERMIT BOUNDARY
- 6823512 — WITHDRAWAL OF WATER WELL
- 6823510 — OBSERVATION WELL
- APPROXIMATE SPRING LOCATION (COMAL SPRINGS)
- STREAM
- SURFACE WATER BODY

ROAD CLASSIFICATION

Expressway	Local Connector
Secondary Hwy	Local Road
Ramp	4WD
Interstate Route	US Route
State Route	

0 1500' 3000'

SCALE IN FEET

STATE WELL NUMBER	OWNER	WATER USE	WELL DEPTH	WELL TYPE
6823504	CITY OF MARION WELL #1	PUBLIC SUPPLY	215	WITHDRAWAL OF WATER
3823508	CITY OF MARION WELL #2	PUBLIC SUPPLY	225	WITHDRAWAL OF WATER
6823808	ROY BARTRAM	PLUGGED OR DESTROYED	530	WITHDRAWAL OF WATER
6823809	MILTON SCHMIDT	STOCK	700	WITHDRAWAL OF WATER
3823810	ROBERT REED	DOMESTIC	459	WITHDRAWAL OF WATER
6823511	CEMEX	UNKNOWN	120	WITHDRAWAL OF WATER
3823512	CEMEX	UNKNOWN		WITHDRAWAL OF WATER
3823513	CEMEX	UNKNOWN	440	WITHDRAWAL OF WATER
3823516	WILLIAM FEY	UNKNOWN	89	WITHDRAWAL OF WATER
215209	HOLCIM LP	PUBLIC SUPPLY	1300	WITHDRAWAL OF WATER
387433	CAPITAL AGGREGATE	INDUSTRIAL	1302	WITHDRAWAL OF WATER
632095	CEMEX	INDUSTRIAL	410	WITHDRAWAL OF WATER
457528	CEMEX	DOMESTIC	280	WITHDRAWAL OF WATER
681888	CEMEX	INDUSTRIAL	380	WITHDRAWAL OF WATER
357206	CEMEX	INDUSTRIAL	440	WITHDRAWAL OF WATER
361874	CEMEX	INDUSTRIAL	440	WITHDRAWAL OF WATER
357208	CEMEX	INDUSTRIAL	367	WITHDRAWAL OF WATER
358923	CEMEX	INDUSTRIAL	350	WITHDRAWAL OF WATER
350442	CEMEX	INDUSTRIAL	400	WITHDRAWAL OF WATER
350435	CEMEX	INDUSTRIAL	340	WITHDRAWAL OF WATER
295492	CEMEX	INDUSTRIAL	380	WITHDRAWAL OF WATER
350439	CEMEX	INDUSTRIAL	300	WITHDRAWAL OF WATER
350444	CEMEX	INDUSTRIAL	400	WITHDRAWAL OF WATER
668004	ET ANIMAL REAL ESTATE, INC.	STOCK	790	WITHDRAWAL OF WATER
6823510	CEMEX	UNUSED	145	OBSERVATION
289831	COMAL COUNTY	MONITOR	39	OBSERVATION
289828	COMAL COUNTY	MONITOR	41	OBSERVATION
289829	COMAL COUNTY	MONITOR	41	OBSERVATION
289827	COMAL COUNTY	MONITOR	41	OBSERVATION
289830	COMAL COUNTY	MONITOR	39	OBSERVATION
70811	CH2M HILL, INC.	MONITOR	180	OBSERVATION
70810	CH2M HILL, INC.	MONITOR	100	OBSERVATION

NOTES:

1. MAP SOURCE: UNITED STATES DEPARTMENT OF THE INTERIOR, GEOLOGICAL SURVEY (USGS), 7 1/2 MINUTE SERIES QUADRANGLE TOPOGRAPHIC MAP OF NEW BRAUNFELS, TEXAS DATED 2022.
2. FACILITY PERMIT BOUNDARY IS PROVIDED BY HMT ENGINEERING & SURVEYING, AUGUST 2025.
3. THIS MAP SHOWS IDENTIFIED WELLS, SPRINGS, AND SURFACE WATER BODIES OR OTHER WATERS WITHIN THE MAP AREA.
4. WELLS AND SPRINGS IN THE AREA WERE IDENTIFIED USING THE TEXAS WATER DEVELOPMENT BOARD DATABASE; WELL RESULTS ARE SHOWN IN THE TABLE ABOVE.

PERMIT DRAWING

REV	DATE	DESCRIPTION	DRN	APP

VLS ENVIRONMENTAL SOLUTIONS, LLC
19500 STATE HIGHWAY 249, SUITE 440
HOUSTON, TX 77070

Geosyntec consultants
TEXAS ENG. FIRM REG. NO. 1182
GEOSYNTEC CONSULTANTS, INC.
10777 WESTHEIMER ROAD, SUITE 900
HOUSTON, TEXAS 77042
PHONE: 281.920.4601

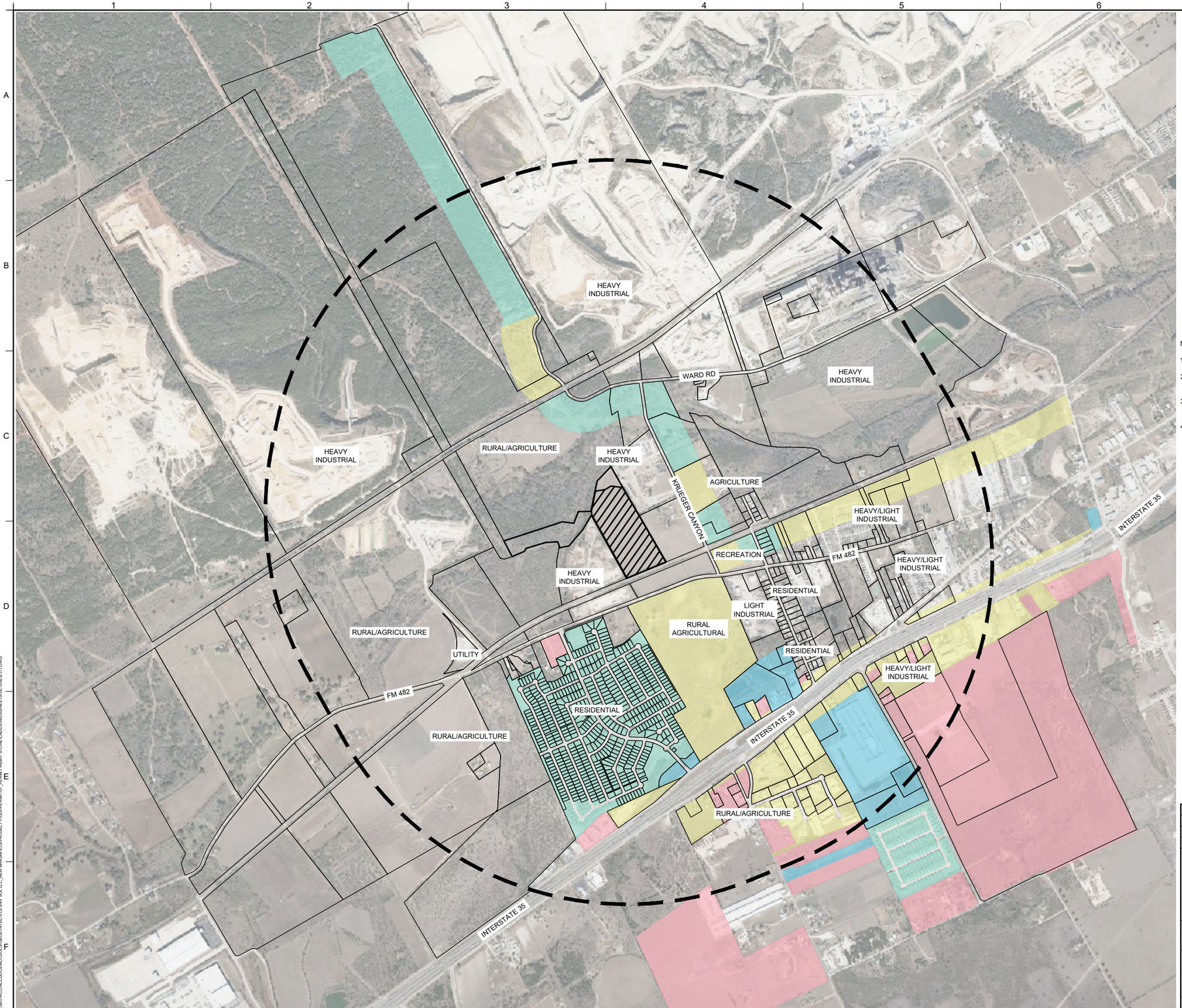
TITLE:

APPLICATION MAP

PROJECT:

VLS NEW BRAUNFELS
INDUSTRIAL NONHAZARDOUS WASTE PERMIT APPLICATION

PROJECT NO.:	GC10923	DESIGN BY:	LS	REVIEWED BY:	JJV	DRAWING NO.:
FILE:	GC10923I.K-1	DRAWN BY:	MDN	APPROVED BY:	BG	I.K-1



PERMIT DRAWING

LEGEND

- PERMIT BOUNDARY
- ONE MILE RADIUS FROM PERMIT BOUNDARY
- VLS ENVIRONMENTAL SOLUTIONS, LLC OWNED PROPERTY
- LAND OWNER PARCEL BOUNDARY
- RESIDENTIAL ZONED AREA
- COMMERCIAL ZONED AREA
- INDUSTRIAL ZONED AREA
- AGRICULTURAL ZONED AREA

N

0 800' 1600'

SCALE IN FEET

NOTES:

1. FACILITY PERMIT BOUNDARY IS PROVIDED BY HMT ENGINEERING & SURVEYING, AUGUST 2025.
2. LAND OWNERSHIP PARCEL BOUNDARIES AND ID NUMBERS OBTAINED FROM COMAL COUNTY APPRAISAL DISTRICT, AUGUST, 2025.
3. ZONING BOUNDARIES ARE PROVIDED BY THE CITY OF NEW BRAUNFELS WEBSITE: HTTPS://OPEN-DATA-NEWBRAUNFELS.HUB.ARCGIS.COM/
4. IMAGERY SOURCE: AERIAL IMAGERY FROM LIVE © 2025 MICROSOFT CORPORATION © 2025 MAXAR © CNES (2025) DISTRIBUTION AIRBUS DS MICROSOFT® BING™ MAPS USING AUTODESK CIVIL 3D.

Beth Ann Gross

10/16/2025

STATE OF TEXAS
BETH ANN GROSS
79864
LICENSED
PROFESSIONAL ENGINEER

REV	DATE	DESCRIPTION	DRN	APP

VLS ENVIRONMENTAL SOLUTIONS
VLS ENVIRONMENTAL SOLUTIONS, LLC
19500 STATE HIGHWAY 249, SUITE 440
HOUSTON, TX 77070

Geosyntec consultants
TEXAS ENG. FIRM REG. NO. 1182
GEOSYNTEC CONSULTANTS, INC.
10777 WESTHEIMER ROAD, SUITE 900
HOUSTON, TEXAS 77042
PHONE: 281.920.4601

TITLE:

LAND USE MAP

PROJECT:

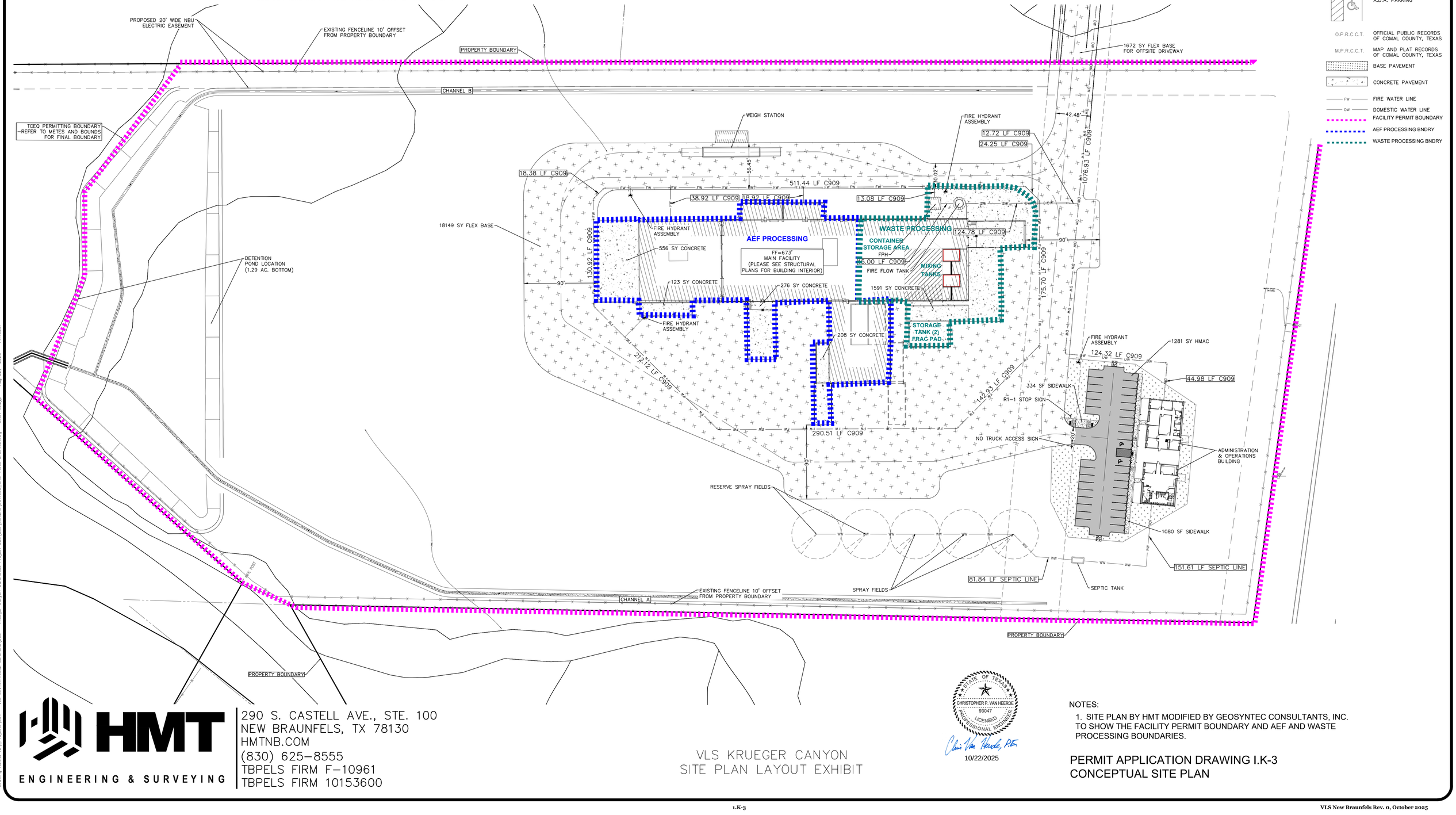
VLS NEW BRAUNFELS
INDUSTRIAL NONHAZARDOUS WASTE PERMIT APPLICATION

PROJECT NO.:	GC10923	DESIGN BY:	LS	REVIEWED BY:	JJV	DRAWING NO.:
FILE:	GC10923I.L-1	DRAWN BY:	MDN	APPROVED BY:	BG	I.K-2

FLEXIBLE PAVEMENTS		
PAVEMENT MATERIAL	CONCRETE	BASE
CONCRETE	7"	–
FLEXIBLE BASE	6"	18"
LIME TREATED SUBGRADE	6"	6"
GEOGRID	NO	YES

NOTE:

1. ALL PAVEMENT CONSTRUCTION SHALL BE PERFORMED IN ACCORDANCE TO THE "GEOTECHNICAL ENGINEERING STUDY FOR NEW VLS RECYCLING FACILITY", BY RABA KISTNER, DATED APRIL 25, 2025.
2. ALL PAVEMENT SECTIONS SHOWN ON THE ABOVE TABLE SHALL SUPERCEDE ANY STANDARD DETAILS WITH RESPECT TO DEPTH OF MATERIALS ASSOCIATED WITH THIS PROJECT.
   2.1. THE SUBGRADE SHOULD BE STABILIZED USING LIME IN ACCORDANCE WITH THE GEOTECHNICAL REPORT. SEE THE "LIME TREATMENT OF SUBGRADE" SECTION WITHIN THE REPORT FOR MORE INFORMATION ON SPECIFICATIONS.
3. THE SUBGRADE SOILS SHOULD BE TESTED FOR SOLUBLE SULPHATE CONTENT PRIOR TO INSTALLATION OF THE LIME OR CEMENT.
4. CONTRACTOR SHALL BE RESPONSIBLE TO ATTAIN A COPY OF THE GEOTECHNICAL REPORT AND THE CONTENTS OF THE REPORT.



LEGEND

- PROPERTY BOUNDARY
- U.E. UTILITY EASEMENT
- B.L. BUILDING LINE
- PROPOSED FIRE LANE
- EDGE OF PAVEMENT
- PROPOSED FIRE HYDRANT
- A.D.A. RAMPS
- A.D.A. PARKING
- O.P.R.C.C.T. OFFICIAL PUBLIC RECORDS OF COMAL COUNTY, TEXAS
- M.P.R.C.C.T. MAP AND PLAT RECORDS OF COMAL COUNTY, TEXAS
- BASE PAVEMENT
- CONCRETE PAVEMENT
- FW FIRE WATER LINE
- DW DOMESTIC WATER LINE
- FACILITY PERMIT BOUNDARY
- AEF PROCESSING BNDRY
- WASTE PROCESSING BNDRY

0 25 50 100
SCALE: 1" = 50'

HMT
ENGINEERING & SURVEYING
290 S. CASTELL AVE., STE. 100
NEW BRAUNFELS, TX 78130
HMTNB.COM
(830) 625-8555
TBPELS FIRM F-10961
TBPELS FIRM 10153600

VLS KRUEGER CANYON
SITE PLAN LAYOUT EXHIBIT

STATE OF TEXAS
CHRISTOPHER P. VAN HEERDE
93047
LICENSED
PROFESSIONAL ENGINEER
Chris Van Heerde, P.E.
10/22/2025

NOTES:

1. SITE PLAN BY HMT MODIFIED BY GEOSYNTEC CONSULTANTS, INC. TO SHOW THE FACILITY PERMIT BOUNDARY AND AEF AND WASTE PROCESSING BOUNDARIES.

PERMIT APPLICATION DRAWING I.K-3
CONCEPTUAL SITE PLAN

Drawing Name: N:_Projects\V91 - VLS Environmental Solutions\003 - Krueger Canyon Warehouse Project CDs\CDs\Exhibits\V91.003_SITE_PLAN_UPDATED.dwg User: kvlopp Aug 22, 2025 - 11:10am

ATTACHMENT I.L

Adjacent Landowners List and Map

ADJACENT LANDOWNER AND PROPERTY ID

PROPERTY ID: 71973
CEMEX CONSTRUCTION MATERIALS SOUTH LLC
10100 KATY FREEWAY STE 300
HOUSTON TX 77043

PROPERTY ID: 71912
VLS ENVIRONMENTAL SOLUTIONS LLC
19500 STATE HIGHWAY 249 STE 400
HOUSTON TX, 77070

PROPERTY ID: 470190
FM 482 PARTNERS LLC
6812 WEST AVENUE STE 200
SAN ANTONIO TX, 78213

PROPERTY ID: 78956
STAATS CAROL A ESTATE ET AL
5751 FM 482
NEW BRAUNFELS TX, 78132

PROPERTY ID: 78959
STAATS KENNETH G
1237 HILLCREST DR
NEW BRAUNFELS TX, 78130

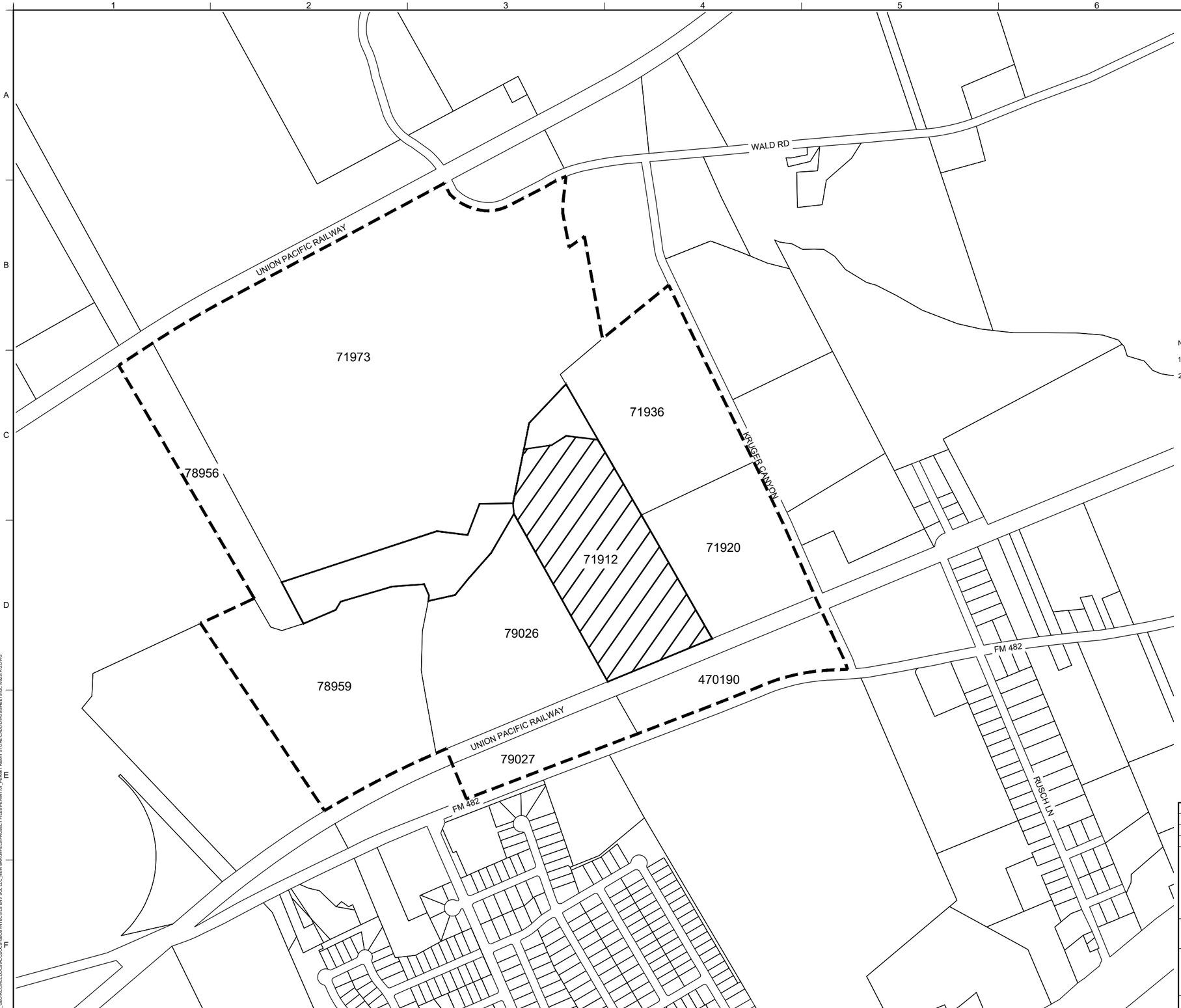
PROPERTY IDS: 79026 & 79027
DIRTPIT I LLC
850 S STATE HWY 46 #5
NEW BRAUNFELS TX, 78130

PROPERTY ID: 71936
ANGEL BROTHERS PROPERTIES LLC
PO BOX 570
BAYTOWN TX, 77522

PROPERTY ID: 71920
ANDAUDB2 LLC
437 LAGUNA VISTA
SEGUIN TX, 78155

ADJACENT LANDOWNER MAILING LABELS (SWR# 99200)

CEMEX CONSTRUCTION MATERIALS SOUTH LLC **10100 KATY FREEWAY STE 300** **HOUSTON TX 77043**	**VLS ENVIRONMENTAL SOLUTIONS LLC** **19500 STATE HIGHWAY 249 STE 400** **HOUSTON TX 77070**	**FM 482 PARTNERS LLC** **6812 WEST AVENUE STE 200** **SAN ANTONIO TX 78213**
STAATS CAROL A ESTATE ET AL **5751 FM 482** **NEW BRAUNFELS TX 78132**	**STAATS KENNETH G** **1237 HILLCREST DR** **NEW BRAUNFELS TX 78130**	**DIRTPIT I LLC** **850 S STATE HWY 46 #5** **NEW BRAUNFELS TX 78130**
ANGEL BROTHERS PROPERTIES LLC **PO BOX 570** **BAYTOWN TX 77522**	**ANDAUDB2 LLC** **437 LAGUNA VISTA** **SEGUIN TX 78155**	



LEGEND

- PERMIT BOUNDARY
- BOUNDARY ENCLOSING THE FACILITY AND THE PROPERTIES OF ADJACENT LANDOWNERS
- VLS ENVIRONMENTAL SOLUTIONS, LLC OWNED PROPERTY
- LAND OWNER PARCEL BOUNDARY (NOTE 2)
- 71912 — COMAL COUNTY PARCEL ID NUMBER (NOTE 2)

0 300' 600'
SCALE IN FEET

NOTES:

1. FACILITY PERMIT BOUNDARY IS PROVIDED BY HMT ENGINEERING & SURVEYING, AUGUST 2025.
2. LAND OWNERSHIP PARCEL BOUNDARIES AND ID NUMBERS OBTAINED FROM COMAL COUNTY APPRAISAL DISTRICT, AUGUST, 2025.

Beth Ann Gross

10/16/2025

STATE OF TEXAS
BETH ANN GROSS
79864
LICENSED
PROFESSIONAL ENGINEER

REV	DATE	DESCRIPTION	DRN	APP

VLS ENVIRONMENTAL SOLUTIONS, LLC
19500 STATE HIGHWAY 249, SUITE 440
HOUSTON, TX 77070

Geosyntec consultants
TEXAS ENG. FIRM REG. NO. 1182
GEOSYNTEC CONSULTANTS, INC.
10777 WESTHEIMER ROAD, SUITE 900
HOUSTON, TEXAS 77042
PHONE: 281.920.4601

TITLE: MAP OF ADJACENT LANDOWNERS

PROJECT: VLS NEW BRAUNFELS
INDUSTRIAL NONHAZARDOUS WASTE PERMIT APPLICATION

PROJECT NO.:	GC10923	DESIGN BY:	LS	REVIEWED BY:	JJV	DRAWING NO.:
FILE:	GC10923I.K-2	DRAWN BY:	MDN	APPROVED BY:	BG	I.L-1

PERMIT DRAWING

ATTACHMENT I.N

Core Data Form

TCEQ Use Only

TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission *(If other is checked please describe in space provided.)*		
☒ New Permit, Registration or Authorization *(Core Data Form should be submitted with the program application.)*		
☐ Renewal *(Core Data Form should be submitted with the renewal form)*		☐ Other
2. Customer Reference Number *(if issued)*	Follow this link to search for CN or RN numbers in Central Registry**	**3. Regulated Entity Reference Number** *(if issued)*
CN 603340787		**RN**

SECTION II: Customer Information

4. General Customer Information	**5. Effective Date for Customer Information Updates** (mm/dd/yyyy)	5/30/2025
☐ New Customer ☒ Update to Customer Information ☐ Change in Regulated Entity Ownership ☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)		
The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).		
6. Customer Legal Name *(If an individual, print last name first: eg: Doe, John)*	*If new Customer, enter previous Customer below:*	
VLS Environmental Solutions, LLC		

7. TX SOS/CPA Filing Number	**8. TX State Tax ID** (11 digits)	**9. Federal Tax ID** (9 digits)	**10. DUNS Number** *(if applicable)*
800915411	12615737645	26-1573764	

11. Type of Customer:	☒ Corporation	☐ Individual	Partnership: ☐ General ☐ Limited
Government: ☐ City ☐ County ☐ Federal ☐ Local ☐ State ☐ Other		☐ Sole Proprietorship	☐ Other:

12. Number of Employees	**13. Independently Owned and Operated?**
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☒ 501 and higher	☒ **Yes** ☐ **No**

14. Customer Role (Proposed or Actual) – *as it relates to the Regulated Entity listed on this form. Please check one of the following*

☐ Owner ☐ Operator ☒ Owner & Operator
☐ Occupational Licensee ☐ Responsible Party ☐ VCP/BSA Applicant ☐ Other:

15. Mailing Address:	19500 State Highway 249, Suite 440						
	City	Houston	**State**	TX	**ZIP**	77070	**ZIP + 4**	3022

16. Country Mailing Information *(if outside USA)*	**17. E-Mail Address** *(if applicable)*
	[redacted]

18. Telephone Number	19. Extension or Code	20. Fax Number *(if applicable)*
(713) 936-0960		( ) -

SECTION III: Regulated Entity Information

21. General Regulated Entity Information *(If 'New Regulated Entity" is selected, a new permit application is also required.)*

☒ New Regulated Entity ☐ Update to Regulated Entity Name ☐ Update to Regulated Entity Information

The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).

22. Regulated Entity Name *(Enter name of the site where the regulated action is taking place.)*

VLS New Braunfels, LLC

23. Street Address of the Regulated Entity: ***(No PO Boxes)***	5350 Buffalo Ranch Drive							
	City	New Braunfels	**State**	TX	**ZIP**	78132	**ZIP + 4**	
24. County	Comal							

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

25. Description to Physical Location:	On IH-35 from New Braunfels, take exit 183. Turn right onto N. Solms Rd. Go 0.2 mi. and then turn left on FM 482. In 0.2 mi. stay right on FM482 and continue 1 mi. Then turn right onto Krueger Canyon Road. In 0.2 miles turn left onto the easement to access the property that is west of Kruger Canyon Road and North of the Union Pacific Railroad.					
26. Nearest City				**State**		**Nearest ZIP Code**
New Braunfels				TX		78132

Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).

27. Latitude (N) In Decimal:	29.663785		**28. Longitude (W) In Decimal:**	-98.194596	
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
29	39	49.63	98	11	40.55

29. Primary SIC Code (4 digits)	**30. Secondary SIC Code** (4 digits)	**31. Primary NAICS Code** (5 or 6 digits)	**32. Secondary NAICS Code** (5 or 6 digits)
4953	5093	562219	N/A

33. What is the Primary Business of this entity? *(Do not repeat the SIC or NAICS description.)*

Stabilization of nonhaz industrial waste

34. Mailing Address:	**19500 State Highway 249, Suite 440**							
	City	**Houston**	**State**	**TX**	**ZIP**	**77070**	**ZIP + 4**	**3022**
35. E-Mail Address:	**bennett.sansbury@vlses.com**							
36. Telephone Number		**37. Extension or Code**		**38. Fax Number** *(if applicable)*				

(713) 936-0960		( ) -

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

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☐ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☐ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

SECTION IV: Preparer Information

40. Name:	Beth Gross	**41. Title:**	Senior Consultant/Principal

42. Telephone Number	**43. Ext./Code**	**44. Fax Number**	**45. E-Mail Address**
(512) 658-3944		( ) -	[redacted]

SECTION V: Authorized Signature

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

Company:	VLS Environmental Solutions, LLC	**Job Title:**	Chief Counsel and Head of Govt Affairs
Name *(In Print)*:	Brian Brantley	**Phone:**	(413) 404- **2899**
Signature:	[signature]	**Date:**	6/5/25

ATTACHMENT I.O

Plain Language Summary Forms

Texas Commission on Environmental Quality

Plain Language Summary

Industrial and Hazardous Waste Permit Applications

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

Application Information	
Purpose of application: ☒ New ☐ Renewal ☐ Modification/Amendment	
Date Submitted to TCEQ: October 2025	
Customer Name: VLS Environmental Solutions, LLC	
Facility Name: VLS New Braunfels	
CN: CN603340787	**RN:** 112239843
Permit Number: To Be Determined (TBD)	**Solid Waste Registration Number:** 99200
Facility Street Address: 5350 Buffalo Ranch Drive, New Braunfels, TX 78132	
Weblink to Street Address: https://arc.is/19TXbP	

Facility Information *(check all that apply)*	
What is the primary type of business?	☐ Chemical manufacturing ☐ Oil refinery ☒ Treatment, storage or disposal facility plant ☐ Other **If other, enter description:**
What does the facility produce?	☐ Chemicals ☐ Fuels / lubricants ☒ No products ☐ Other **If other, enter description:**

Waste Management Information *(check all that apply)*	
What types of wastes are managed?	☒ Nonhazardous industrial ☐ Hazardous ☐ Other **If other, enter description:**
Where does the waste come from?	☒ Off-site source ☐ On-site source
How is the waste managed?	☒ Storage ☒ Process / Treatment ☐ Disposal ☐ Other **If other, enter description:**
What type of units manage the waste?	☒ Active ☐ Post-Closure **Type and count:** A container storage area, two storage tanks, and two mixing tanks.
What happens to waste managed at the facility?	☒ Transported off-site ☐ Disposed on-site ☐ Other **If other, enter description:**

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

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

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

Clear Form

Comisión de Calidad Ambiental de Texas

Resumen en Lenguaje Sencillo

Solicitudes de Permisos de Desechos Industriales y Peligrosos

Instrucciones

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

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

Información de la Solicitud

Propósito de la solicitud:	☒Nuevo	☐Renovación	☐Modificación/Enmienda
Sometido a TCEQ: Octobre de 2025			
Nombre del Cliente: VLS Environmental Solutions, LLC			
Nombre de la Instalación: VLS New Braunfels			
CN: CN603340787	**RN:**112239843		
Número de Permiso: Por determinar	**Número de Registro de Desechos Sólidos:** 99200		
Dirección de la Instalación: 5350 Buffalo Ranch Drive, New Braunfels, TX 78132			
Enlace Web a la Dirección Postal: https://arcg.is/19TXbP			

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

¿Cuál es el tipo principal de negocio?	☐Planta de manufactura química	☐Refinería de aceite	☒ Instalación de tratamiento, almacenamiento o eliminación
	☐Otro **Si es otro, introduzca la descripción:** Introduzca la descripción		
¿Qué produce la instalación?	☐Químicos	☐Combustibles / lubricantes	☒Sin productos
	☐Otro **Si es otro, introduzca la descripción:** Introduzca la descripción		

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

¿Qué tipos de desechos se gestionan?	☒Industrial no peligroso	☐Peligroso	
	☐Otro **Si es otro, introduzca la descripción:** Introduzca la descripción		
¿De dónde provienen los desechos?	☒Fuente externa	☐Fuente interna	
¿Cómo se gestionan los desechos?	☒Almacenar	☒Procesar / Tratar	☐Eliminación
	☐Otro **Si es otro, introduzca la descripción:** Introduzca la descripción		
¿Qué tipo de unidades gestionan los desechos?	☒ Activo ☐ Postcierre **Teclee y cuente:** una área de contenedores de almacenamiento, dos tanques de almacenamiento, y dos tanques de mezclando		

¿Qué sucede con los desechos gestionados en la instalación?	☒Transportados fuera del sitio ☐Eliminado en el sitio ☐Otro **Si es otro, introduzca la descripción:** Introduzca la descripción

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

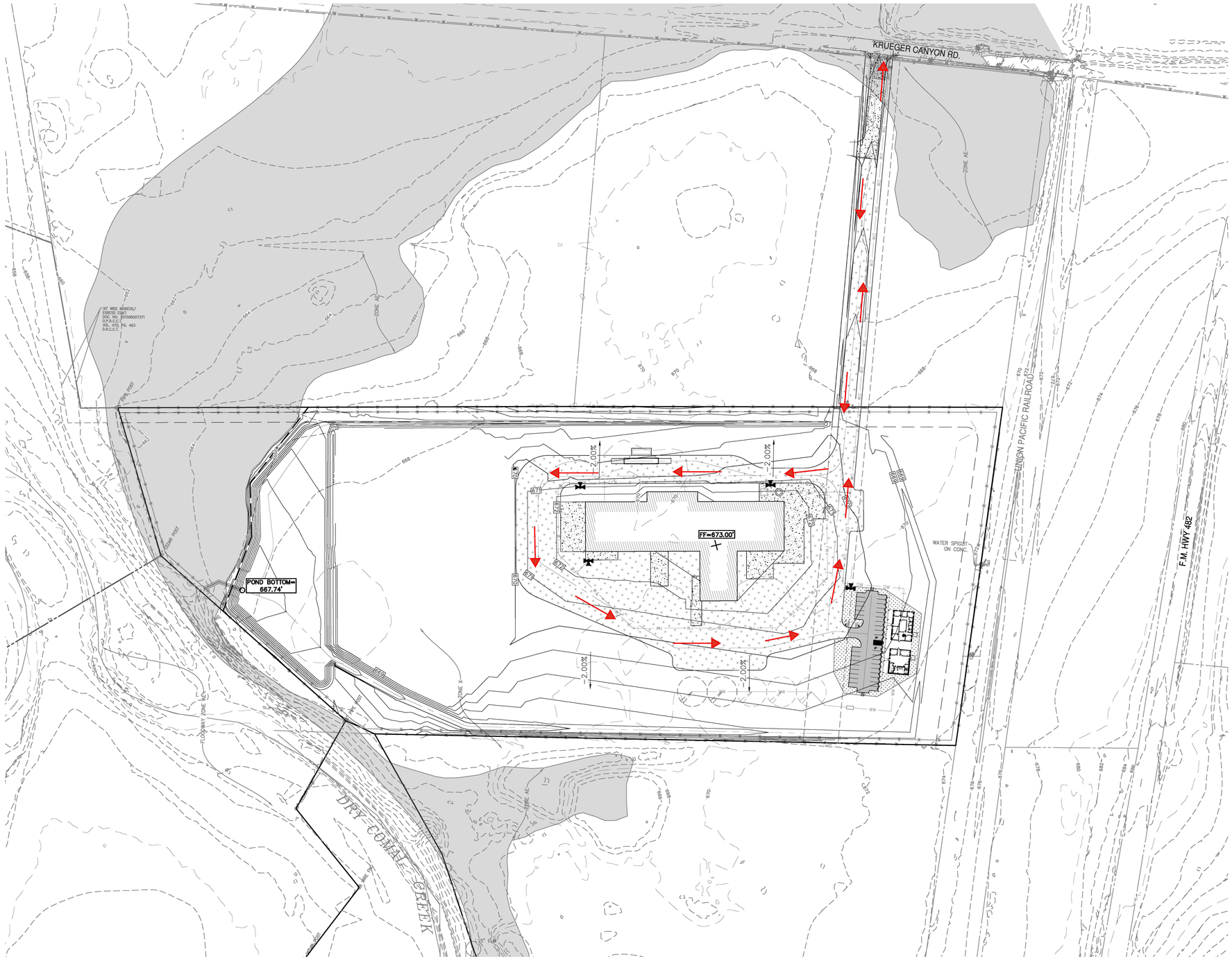
Descripción de la Actualización (*solo para Modificaciones y Enmiendas de Clase 3)*

Liste y explique cualquier cambio que esta modificación o enmienda haría a las dos secciones anteriores: **Información de Gestión de Desechos** y **Métodos de Control de la Contaminación**.

Introduzca una descripción concisa

ATTACHMENT II.A

Site Access and Traffic Controls



0 50 100 200
SCALE: 1" = 100'

CUT/FILL VOLUMES	
CUT	40108.58 CU. YD.
FILL	17662.56 CU. YD.

TRAFFIC DIRECTION

HMT
ENGINEERING & SURVEYING

290 S. CASTELL AVE., STE. 100
NEW BRAUNFELS, TX 78130
HMTNB.COM
(830) 625-8555
TBPELS FIRM F-10961
TBPELS FIRM 10153600

VLS SITE PLAN GRADING EXHIBIT

STATE OF TEXAS
CHRISTOPHER P. VAN HEERDE
93047
LICENSED
PROFESSIONAL ENGINEER
10/22/2025

NOTES:

1. SITE PLAN GRADING BY HMT MODIFIED BY GEOSYNTEC CONSULTANTS, INC. TO SHOW THE FACILITY PERMIT BOUNDARY AND AEF AND WASTE PROCESSING BOUNDARIES.

PERMIT APPLICATION DRAWING II.A-1
SITE ACCESS AND TRAFFIC PLAN

ATTACHMENT II.B.2

Example Weekly Inspection Forms for Waste Management Units

Solid Waste Processing Facility Weekly Inspection Form

Date of Inspection: _____ **Time of Inspection:** _____ **Inspector:** _____

1. Does the sump area need to pump down?

Comments: _____

2. Does retainer curb show signs of deterioration?

Comments: _____

3. Does area show any sign of leaked or spilled waste?

Comments: _____

4. Does concrete show signs of deterioration?

Comments: _____

5. Is processing occurring in any bulk containers?

Comments: _____

6. Are all containers closed and labeled?

Comments: _____

7. Is there sufficient aisle space?

Comments: _____

8. Does the solidification pit lining show any signs of deterioration or malfunction?

Comments: _____

9. Do hoses and fitting show any signs of deterioration?

Comments: _____

10. Does the bulking agent storage area show signs of deterioration?

Comments: _____

CONTAINER STORAGE AREA
WEEKLY INSPECTION FORM

Date	Time	Inspector's Name	Are all containers free of leaks? Pass or Fail (comment)	Are all containers closed? Pass or Fail (comment)	Are all containers properly labeled? Pass or Fail (comment)	Are containers in good condition? Yes or No (comment)	Are containment basins free of cracks and signs of leakage? Pass or Fail (comment)	Is the general area clean and free of spills? Pass or Fail (comment)

ATTACHMENT II.C.1

Facility Staff Qualifications and Duties

FACILITY STAFF QUALIFICATIONS AND DUTIES

Environmental Managers, Operations Supervisors, and Operators are all potentially involved with the operations at the VLS New Braunfels non-hazardous waste storage and processing facility (Facility). The Environmental Manager will be responsible for selecting effective waste processes and will act as the contact person with regulatory agencies. The Operations Supervisor will be responsible for the routine activities of processing non-hazardous wastes including acceptance of non-hazardous wastes to the Facility, preparing reports for regulatory agencies, and supervising employees carrying out waste processing activities. Operators will be tasked with conducting the waste processing activities including carrying out waste processing procedures and conducting Facility inspections. Operators will also potentially be trained in recognition of acceptable and unacceptable wastes. In addition to the positions described below, the Facility Manager will be responsible for all aspects of operations at the Facility. Other employees may be used within the Facility, and positions and duties will be established in accordance with needs.

Environmental Manager Duties

- Act as a contact person with regulatory agencies
- Ensure process is effective (as necessary)

Operations Supervisor Duties

- Approves or disapproves solid waste streams for acceptance at the Facility based upon information on the waste profile form, the shipping document, the waste acceptance procedures in the Non-Hazardous Waste Analysis Plan (Attachment III.D), and other information as needed
- Prepares reports for regulatory agencies

Lead Operator Duties

- Conducts Facility inspections
- Carries out waste processing procedures

Personal Training Program

Facility operations employees will receive the following training as a minimum:

1. Operations employees will have eight (8) hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Awareness Level training.
2. Operations employees will be trained in mechanical guards and hazards (lock-out/tag out of hazardous energy, rotational hazards, conveyor hazards, grinder/shredder hazards, etc.).
3. Forklift operators will be trained and licensed as required by the Occupational Safety and Health Administration (OSHA).
4. Operations employees will be trained in Spill Response.

5. Operations employees will be trained in the solid waste processing procedures, including the fact that hazardous wastes are not allowed in the non-hazardous waste processing area.
6. Operations employees will be trained in the Facility's Operations Plan.
7. Operations employees will be trained in collection of waste samples for Toxicity Characteristic Leaching Procedure (TCLP) analysis.
8. Operations employees will be trained in the use, calibration, and maintenance of analytical devices used for waste screening.

A twenty-four (24) hour HAZWOPER, Cardiopulmonary Resuscitation (CPR), and First Aid trained supervisor will be on-site during all hours of operation.

Operations employees will undergo an annual refresher training course in addition to the monthly safety meetings conducted to review the safety topics listed above and to continually update safety training. Records documenting personnel training will be kept on-file at the Facility and will be provided upon request.

ATTACHMENT II.D

Equipment Plan

EQUIPMENT PLAN

The VLS New Braunfels facility (Facility) uses equipment for non-hazardous waste storage and processing operations and for waste acceptance procedures outlined in the Non-Hazardous Waste Analysis Plan (Attachment III.D).

Non-Hazardous Waste Acceptance Procedures Equipment

The following equipment is used at the Facility to perform non-hazardous waste acceptance procedures (see Attachment III.D for a description of uses):

- pH Meter
- Organic Vapor Analyzer (OVA)
- Flashpoint Measurement Equipment
- Sample Collection Equipment (See Attachment III.D for descriptions of potential sample collection equipment)

The equipment will be calibrated and maintained in accordance with the manufacturer's requirements.

Non-Hazardous Waste Processing Operations Equipment

Facility operations include moving waste and waste containers, dumping waste materials into the Mixing Tanks for mixing with stabilization agents as well as other waste or AEF, and loading outbound mixed material into containers. If any waste is spilled outside of the Mixing Tanks, absorbent material and appropriate personal protective equipment will be used for clean-up.

- Forklift and Drum Lift – A forklift is used to offload palletized containers when deliveries are made. If drums are not palletized, a drum lift is attached to the forklift. If waste is delivered in totes, a forklift is used to unload and stage totes.
- Front End Loader – A frontend loader or similar piece of equipment is used to move sawdust and absorbent materials to the Mixing Tanks.
- Excavator – An excavator is used for blending the material within the Mixing Tanks and loading outbound containers.

The Facility will maintain at least one piece of the processing operations equipment listed above. Should a piece of equipment require maintenance and/or repair, an additional piece of equipment will be leased from a contract leasing company until maintenance or repairs are complete.

ATTACHMENT III.D

Non-Hazardous Waste Analysis Plan

NON-HAZARDOUS WASTE ANALYSIS PLAN

The VLS New Braunfels non-hazardous waste storage and processing facility (Facility) accepts non-hazardous industrial wastes for processing through consolidation, mixing, and solidification. These non-hazardous wastes include but are not limited to the following types of wastes: non-hazardous inorganic and organic liquids, inorganic and organic solids, and inorganic and organic sludges. All processed wastes will either be landfilled offsite or will be sold to industrial facilities as an alternative fuel.

Because the non-hazardous wastes vary with the source, the Facility uses waste profiling and acceptance procedures outlined in the following sections to determine whether a waste is suitable for acceptance and treatment at the Facility.

Waste Profile Approval Procedures

Prior to accepting non-hazardous waste at the Facility for consolidation, mixing, or solidification, it is necessary to confirm the regulatory status and determine the appropriate processing requirements for the waste. This is accomplished by having the generator complete a generator's waste profile form such as the one provided in Attachment III.D.1. Generators may use their own profiles as long as the completed profile contains the necessary information and a statement from the generator certifying that the waste is non-hazardous.

Each profile describes the characteristics of the non-hazardous waste material that will be accepted by the Facility. Information provided on the waste profile is based upon one or more of the following:

- The generator's knowledge of the physical and chemical properties of the waste;
- Analytical data representative of the waste stream that is no more than two (2) years old; and/or,
- Safety Data Sheets (SDSs) associated with materials used in the process that generated the waste.

In order for the Facility to accept a waste material, the generator of the waste must certify in the waste profile that a hazardous waste evaluation has been performed and that the solid waste is non-hazardous, as specified in Title 40 of the Code of Federal Regulation (CFR), Parts 260-262, as appropriate. For unused or off specification commercial chemical products and processes where the ingredients or formulations are known to the generator, an SDS can be submitted with the profile in support of the generator's characterization of the waste material.

Once submitted, VLS staff reviews each profile to determine whether the information presented is complete and reasonable. If necessary, the generator is contacted to request additional information. If the generator does not provide the necessary information, the profile will be rejected and the waste will not be accepted at the Facility. In some cases, VLS may request a representative sample of the waste material. The sample may be analyzed in-house by at the Facility or sent to a TCEQ-certified National Environmental Laboratory Accreditation Program (NELAP) contracted laboratory for analysis to complete the waste characterization process.

Based on the information provided on the waste profile and any testing that may have been done on the waste stream, the waste profile is either accepted or rejected by the Environmental Manager or their designated representative. If approved, the Environmental Manager or designated representative assigns a profile number, signs the waste profile, and notifies the generator that the non-hazardous waste material has been accepted for processing at the Facility.

Profiles will typically be submitted, reviewed, and approved electronically. If a hard copy profile is submitted, it is processed in one of two ways: (1) the paper profile is scanned, stored in an electronic database, reviewed, assigned a profile number, and signed electronically upon approval or (2) the paper profile is reviewed, assigned a profile number, physically signed, and scanned to be stored in the electronic database.

Waste profiles are updated by the generator on an annual basis or for any of the following reasons:

- When processing changes at the generating facility change the characteristic of the waste; or
- When changes in applicable regulations make modifications necessary.

Profiles can be updated in two ways. If the characteristics of the waste stream have not changed, the profile is recertified by the generator using a Recertification Form similar to the one included as Attachment III.D.2. Waste stream approvals may be authorized using similar forms as long as all of the information required on the Recertification Form is provided. If the characteristics of the waste material may have changed, a new waste profile form must be submitted by the generator and undergo the waste profile approval process described previously.

VLS strives to be environmentally conscious; therefore, submission of paper copies of profiles and recertifications are discouraged, and hard copies are not retained. VLS maintains all profiles and recertifications electronically on the secure corporate server for a minimum of three (3) years.

The only acceptable waste at the Facility is non-hazardous industrial waste that is free of asbestos, polychlorinated biphenyls (PCBs), and reactive materials. No municipal solid waste, hazardous waste, pesticide waste, herbicide waste, biological-infectious waste, biomedical waste, or radioactive waste is to be accepted at the Facility.

Transporter Check In and Shipping Documents

Upon arrival to the Facility, the transporter will check in with the attending Facility staff at the entrance gate. The staff will then contact the processing facility operator prior to allowing the transporter access beyond the gate.

The transporter will provide VLS with a shipping document prior to being unloaded. The only accepted forms of shipping documents are non-hazardous waste manifests, uniform hazardous waste manifests for non-hazardous wastes that are regulated as state hazardous wastes in another state, and non-hazardous waste bills of lading. An Operations Supervisor or trained Operator will review the shipping documents to determine that the shipping documents are filled out completely, the waste is designated for the Facility, and that the waste has an active and accepted profile on file.

Resource Conservation and Recovery Act (RCRA) hazardous waste will not be accepted. If hazardous waste and non-hazardous waste are shipped in the same vehicle, the hazardous waste must be unloaded at a hazardous waste facility prior to the non-hazardous waste being unloaded to the non-hazardous waste processing area at the Facility. Hazardous waste-bearing containers will not be allowed into the non-hazardous waste processing area.

Solid Waste Receiving and Acceptance

The Facility receives non-hazardous wastes in containers. A container is any portable device in which a material is stored, transported, or otherwise handled. The most common containers that arrive at the site are drums (typically 55-gallon), totes (typically 275-gallon), pails, over-the-road tankers, roll-off boxes, dump trailers, dump trucks, and box trailers.

Non-Bulk Container Receiving and Acceptance

Once the non-hazardous waste manifest is verified, non-bulk containers (e.g., drums, totes, and pails) are off-loaded from the truck. As the containers are unloaded, the operator will assess whether or not any containers are leaking. If a container is damaged and/or leaking, the damaged container may be handled by either transferring the material to a new container with proper labeling, placing the container in a containment structure, or placing the container in a suitable over-pack container.

The steps for screening and acceptance of individual containers are as follows:

A. Upon arrival at the Facility, the containers are unloaded and inspected for acceptable non-hazardous waste labels. Acceptable non-hazardous waste labels may be supplied to the generator by VLS. These labels are either pre-printed with the proper information or have spaces for the generator to enter the non-hazardous waste information. Labels should contain the generator name, address, and a description of the contents of the container. VLS also requires that the generator include the profile number (if available) in the contents section of the container label.

B. The operator compares the non-hazardous waste description and profile number on the label with the information on the non-hazardous waste manifest or bill of lading. Similarly, the operator confirms that the information on the label and non-hazardous waste manifest or bill of lading corresponds with the information on the non-hazardous waste profile. The operator also confirms that the number of containers received corresponds with the number of containers listed on each line item on the non-hazardous waste manifest or bill of lading. If the label information and quantity match the shipping document, the operator signs the shipping document to indicate receipt of the container(s). However, receipt does not necessarily mean acceptance.

C. After the label and shipping document information have been confirmed, the Operator opens each container by removing the lid, cap, or bung to evaluate the contents for consistency with the information on the label and waste profile. As described below, based visual observation of the waste, the Operator may collect a sample of the waste in order to check the pH and the organic vapor analyzer (OVA) reading. If the OVA reading is greater than 50 ppm the sample will also be evaluated for flashpoint. If there is a discrepancy, the

Operator notifies the Environmental Manager or designated representative to review the profile and the generator may be contacted to resolve the discrepancy.

a. pH Testing – If the aqueous liquid fraction is estimated to be more than 10% of the total volume of the container, a designated Operator will measure the pH of the aqueous liquid. The corrosivity characteristics for aqueous liquids as determined by pH (Method 9040C) applies to aqueous wastes and those multiphase wastes where the aqueous phase constitutes at least 20% of the total volume; therefore, VLS is conservative in its estimate of free aqueous liquid. In order to provide a margin of safety, the waste will not be accepted if the pH reading is less than 2.25 standard units (s.u.) or greater than 12.25 s.u., unless the generator can provide certified laboratory results that shows that the pH of the material falls into the non-hazardous waste range of greater than 2.0 s.u. or less than 12.50 s.u. and certifies that the waste is non-hazardous. For off-spec product wastes, an SDS sheet is acceptable for pH certification. If the generator cannot provide analysis or SDS for the material, then the waste will be rejected.

b. OVA Screening – If the aqueous liquid fraction is estimated to be more than 10% of the total volume of the container, the container is screened for organic vapors using an OVA. An OVA is a portable instrument used to detect the presence of organic vapors using photo-ionization detection technology. Containers with free liquids exhibiting an OVA reading of greater than 50 ppm above ambient air background readings will be considered to have organic vapors present. If organic vapors are present, a flashpoint test will be conducted in order to identify the flashpoint of the waste material.

c. Flashpoint – Flashpoint testing is performed on all containers deemed to have organic vapors at greater than 50 ppm which have a free liquid layer. For this purpose and to provide a margin of safety, wastes with a flashpoint less than 150°F will not be accepted unless the generator can provide certified laboratory flash point test results that show the flash point is greater than 140°F and can certify that the waste is not hazardous. If the generator cannot provide certified analysis, the waste will be rejected.

D. In addition to the previously described screening process, the Facility may perform supplemental physical or chemical testing as desired. Additional screening may include but is not limited to, analysis for metals, PCBs, and halogenated compounds. See Attachment III.D.3 for EPA methods.

E. If the waste characteristics are consistent with the profile upon completion of the screening assessment, the waste is accepted for processing at the Facility. An operator enters the information about the waste into an electronic database that tracks the waste through the process. For tracking, the operator will enter the following information:
- Date received;
- Generator's Name;
- Generator's Address;
- Generator's Telephone Number;

- Transporter's Name;
- Transporter's Address;
- Transporter's Telephone Number;
- Transporter's Permit Number;
- Type of Container;
- Number of containers;
- Non-hazardous waste profile number;
- Non-hazardous waste manifest number;
- Screening information (based on visual observation, possibly pH, OVA, and flashpoint);
- Waste Description;
- Weight / Volume; and
- Ultimate disposition.

All records will be available for TCEQ review and are kept for a minimum of three (3) years.

Bulk Container Receiving and Acceptance

Bulk containers include, but are not necessarily limited to, vacuum trucks, over-the-road tankers, dump trucks, dump trailers, and roll-off boxes. The steps for screening and acceptance of bulk containers are as follows:

A. After the Operator reviews the non-hazardous waste manifest or bill of lading and confirms that the material identified on the paperwork conforms to the wase profile, the Operator signs the shipping document to indicate receipt of the container. However, receipt does not necessarily mean acceptance.

B. If it is safe to do so and appropriate personal protective equipment (PPE) for the task is worn, the operator collects a grab sample from the sample port or top of the container and evaluates the contents for consistency with the information on the waste profile. The operator does this by checking the pH, the OVA reading, and the flashpoint as described in the Non-Bulk Container Receiving and Acceptance Section above. If there is a discrepancy, the operator notifies the Environmental Manager or their designated representative.

C. If the waste characteristics are consistent with the profile upon completion of the screening assessment, the waste is accepted for processing at the Facility. An Operator enters the information about the waste into an electronic database that tracks the waste through the process. For tracking, the Operator will enter the following information:

    - Date received;
    - Generator's Name, Address, and Telephone Number;
    - Transporter's Name, Address, Telephone Number, and Permit Number;
    - Type of container;
    - Number of containers;
    - Non-hazardous waste manifest number;

- Screening information ((based on visual observation, possibly pH, OVA, and flashpoint);
- Waste Description;
- Weight / Volume; and,
- Ultimate disposition.

All records will be available for TCEQ review and are kept for a minimum of three (3) years.

Sampling Procedures

The sampling strategies utilized at the Facility depend on the variability of the waste. Grab samples are collected to conduct the procedures for receiving and acceptance of solid waste. Selecting appropriate sampling equipment is a function of the physical and chemical properties of the waste as well as any potentially site-specific conditions relating to the waste, which may need to be considered. Personnel responsible for collecting samples take these factors into consideration as well as their safety and the safety of others. Prior to sampling, the necessary equipment (e.g., sample containers, labels, personal protective equipment, logbook, etc.) is collected and a preliminary sampling strategy is developed.

The Facility uses a variety of equipment to collect representative samples of waste materials being analyzed. The sampling equipment and methods of use are those listed in 40 CFR 261 Appendix I, and the associated references ("Test Methods for the Evaluation of Solid Waste Physical/Chemical Method" EPA publication SW-846; "Samplers and Sampling Procedures for Hazardous Waste Streams" EPA 600/2-80-018, January 1980; "Standard Methods for the Examination of Water and Wastewater," or American Society for Testing and Materials (ASTM) methods. The decision on the type of equipment used for sampling a particular waste stream is a function of the sample matrix and expected variability within that matrix. Types of sampling equipment that are used include ethe following:

- Composite Liquid Waste Sampler (Coliwasa) – A Coliwasa consists of a glass, plastic, or metal tube equipped with an end closure that can be opened and closed while the tube is submerged in the material to be sampled. The Coliwasa is most appropriate for sampling free-flowing liquids and slurries contained in drums, shallow tanks, pits, and similar containers. The Coliwasa is also well suited for sampling wastes with immiscible liquid phases.
- Bottle – A bottle used for sampling consists of a glass or plastic bottle with a stopper and may also consist of a weight and line that is used to lower, raise, and open the bottle. The bottle is most appropriate for sampling liquids and free-flowing slurries.
- Thief – A thief consists of two slotted concentric tubes, usually made of stainless steel or brass, with the outer tube having a conical pointed tip to facilitate penetration of the material being sampled. The inner tube is rotated to open and close the sampler. A thief is most appropriate for sampling dry granules or powdered wastes with particle diameters less than one-third the width of the slots.
- Trier – A trier consists of a tube cut in half lengthwise with a sharpened tip that can be used to loosen soil and facilitates sampling in sticky solids. A trier is most appropriate for

sampling moist or sticky solids with a particle diameter less than one-half the diameter of the trier.

- Auger – An auger consists of sharpened spiral blades attached to a hard metal central shaft. An auger is most appropriate for sampling hard or packed solid wastes or soil.
- Scoops and shovels – Scoops and shovels consist of spaded tools that can be used to sample a variety of solid and semi-solid matrices. Scoops and shovels are most appropriate for sampling granular or powdered material in bins, shallow containers, and conveyor belts.
- Pumps – Pumps are most appropriate for sampling an aqueous matrix and can consist of a variety of pumps (e.g., suction, positive displacement, bladder, etc.).

Certain sampling situations, safety considerations (e.g., the need to minimize exposure), and/or sampling logistics (e.g., accessibility to sampling locations) may dictate that alternate sampling equipment, aside from those listed above, be used. Sampling equipment will be selected ensuring that it yields representative samples from the matrix being sampled and is equivalent to that listed in 40 CFR 261 Appendix I.

Decontamination of sampling equipment used in multiple sampling events is necessary to maintain the integrity of samples collected. Whenever possible, disposable (which is disposed of after each use) or dedicated (which remains at the same sampling location) sampling equipment is used to eliminate the possibility of cross contamination. Also, when appropriate, "certified clean" containers will be used to collect samples. However, when it is impractical to use disposable sampling equipment, sampling equipment is decontaminated between collection of individual samples using a mixture of industrial detergent and distilled and/or reagent-grade water followed by a distilled water rinse.

Some analytical methods require that the sample be preserved to maintain its integrity until analysis. The preservation requirements in the analytical methods listed in Attachment III.D.3 should be followed.

Rejected Waste

If a container is not properly labeled or if a discrepancy is noted between the visual evaluation or grab sample results and the waste characterization information on the waste profile, the container(s) are isolated in the non-conforming waste storage area of the Facility. The date and reason for non-conformance will be written on the label and on the non-hazardous waste manifest. The Environmental Manager or their designated representative will contact the generator to resolve the labeling or characterization discrepancy. If the discrepancy cannot be resolved within 72 hours, the container(s) will be rejected and returned to the generator. If non-conforming waste is received from the same profile on more than once occasion, the profile will be suspended and the generator will be required to provide a written explanation for nonconformance. Any waste that could be possibly be classified as hazardous waste, based on VLS screening protocol, will be rejected back to the generator. The waste container(s) will be segregated and the generator will be contacted to remove the container from the Facility.

VLS maintains an electronic record of non-conforming containers that are received at the Facility. The records are maintained for a minimum of 3 years. The records include information regarding the following:

- The generator's name, address, and telephone number;
- Shipment date, type and number of containers;
- Profile number;
- Reasons for non-conformance;
- Results of waste screening tests, if performed; and
- Disposition of the waste including date generator removed waste from the Facility.

ATTACHMENT III.D.1

Example Generator's Waste Profile Form

Generator Waste Profile

VLS Environmental Solutions, LLC
Phone: (877) 861-8588

Profile Number: _____

☐ **Choose Location**
Select your location from the drop-down

VLS Armor: approvals-armor@vlses.com

☐ PO Required ☐ Portal Submission

I. General Information

A. Generator Name: _____
B. Generator Address: _____
_____
C. Generator Contact: _____
D. Generator EPA ID No.: _____
E. Generator State ID No.: _____
F. Generator Phone No.: _____
G. Generator Email: _____

H. Billing Name: _____
I. Billing Address: _____
_____
J. Billing Contact: _____
K. Billing Phone No.: _____
L. Billing Email: _____
M. VLS Sales Contact: _____

II. Waste Information - Please use full names rather than acronyms

A. Name of waste stream _____
B. Describe process generating the waste: _____
C. Volume: _____ D. Frequency: _____ E. Waste Container (Truck, Drum, etc.): _____
F. Is this waste incompatible with other material? ☐ Yes ☐ No If yes, explain: _____

III. Physical Characteristics of Waste Stream

A. Flashpoint: _____ °F B. pH: _____ C. Color/Appearance: _____
D. Solids: _____ % E. Odor: _____ F. Phases/Layers: ☐ Single ☐ Multiple
G. BTU Value: _____ /lb H. Physical State: (check all that apply) ☐ Liquid ☐ Sludge ☐ Solid ☐ Powder

IV. Chemical Composition-Constituents • Do not use generic terms (eg. Organics, Salt, Solids, Oils) • Attach SDS for products

_____	_____	ppm or %	_____	_____	ppm or %
_____	_____	ppm or %	_____	_____	ppm or %
_____	_____	ppm or %	_____	_____	ppm or %
_____	_____	ppm or %	_____	_____	ppm or %

No Acronyms - Please use full chemical name Total _____ % (Must be ≥ 100%)

V. Waste Content • Please indicate if the waste contains any of the following: (Attach Analytical where Applicable)

Sulfide	_____ ppm	☐ Yes	☐ No	Radioactive?	☐ Yes	☐ No	Explosive Material?	☐ Yes	☐ No
Cyanide	_____ ppm	☑ Yes	☐ No	PCB's >50 ppm?	☐ Yes	☐ No	OSHA Concerns?	☐ Yes	☐ No
Benzene	_____ ppm	☑ Yes	☐ No	Heavy Metals?	☐ Yes	☐ No	Medical/Blood Pathogens?	☐ Yes	☐ No
Lithium Batteries		☑ Yes	☐ No	Pesticide/Herbicide?	☐ Yes	☐ No	Asbestos?	☐ Yes	☐ No

VI. Regulatory Determination (SDS) Analytical

A. Above information is based on the provided safety data sheet? ☐ Yes- SDS is attached? ☐ No
B. Above information is based on generator knowledge? ☐ Yes ☐ No

VI. Regulatory Determination *(Continued)*

VLS Environmental Solutions, LLC
Phone: (877) 861-8588

C. Analytical data is attached? ☐ Yes ☐ No

D. Is this material generated from a metal working or plating process? ☐ Yes ☐ No

E. Is this a DOT regulated material? ☐ Yes ☐ No If yes, please list shipping description _____

F. Does this waste stream qualify for the "Alcohol Exclusion" Per 40CFR 261.21? ☐ Yes ☐ No

If "yes" then Exclusion Certification must be submitted.

G. Is this waste "Used Oil" as defined in 40 CFR 279 or generator state regulations? ☐ Yes ☐ No

If Yes, please complete **Section VIII.** Used Oil Warranty.

H. Is this material an EPA regulated waste? ☐ Yes ☐ No

I. State Waste Code(s) (if applicable) _____

VII. Desired Treatment Technology

Generator waste disposal preference: ☐ Subtitle C/D Landfill ☐ Waste to Energy ☐ Recycling ☐ Wastewater Treatment ☐ Oil Recovery ☐ Carbon Slurry ☐ Wood Grinding

VIII. Used Oil Warranty (complete if waste is a "Used Oil" or contains "Used Oil") ☐ Not Applicable

1. Has this "Used Oil" been mixed with Hazardous Waste? ☐ Yes ☐ No ***If yes, this waste cannot be accepted at VLS.*

**Used oil is oil that has been refined from crude or syntehtic oil and used as a lubricant.*

2. Does this Used Oil contain Total Halogens greater than 1,000 ppm? ☐ Yes *If yes, must complete VIII(3) below.*
☐ No *(Confirmed by Chlor D Tect or equivalent – US EPA Method 9075.)*

**If no, the Used Oil is non-hazardous and the Used Oil Warranty is complete. Please initial Section VIII and continue to Section IX.*

3. If yes to VIII (2) above, can you rebut the presumption that the Used Oil is a Hazardous Waste? ☐ Yes ☐ *No

*** If no to VIII (3), this waste cannot be accepted at VLS.**

(Pursuant to EPA 40 CFR 279, WI DNR NR 679, 35 IL Adm. Code Part 739, 25 PA Chapter 298, IN 329 IAC 13 and IA Code 455B.)

If yes to VIII (2) above, Generator must Rebut the Presumption by:

a. Demonstrating the total halogen content is due to the presence of a Halogenated Constituent of the oil formulation; for example, Chlorinated Parrafins. This Used Oil has not been mixed with a chlorinated solvent or other hazardous waste.
Safety Data Sheet MUST be attached.

b. Providing a certified laboratory analysis is affirming the used oil does not contain a concentration in excess of 100 ppm for any F001/F002 constituent.

Generator's Initials _____

IX. Generator's Certification

Signature _____ Printed (or typed) Name & Title _____ Date _____

The sample submitted is representative as defined in 40 CFR 261-appenxis I and EPA SW-846, chapter 9. I hereby certify that (i) the above and attached description is complete and accurate to the best of my knowledge and ability to determine that, (ii) no deliberate or willful omissions of composition or properties exist and that (iii) all known or suspected hazards have been disclosed. I authorize VLS to obtain a sample from any waste shipment. By my signature above I hereby acknowledge that I have carefully read and agree to VLS Terms and Conditions as set forth on its website at https://www.vlses.com/waste-services-terms-conditions and hereby represent and warrant complete authority to enter into said agreement on behalf of company.

X. VLS Environmental Solutions, LLC

Signature _____ Printed (or typed) Name & Title _____ Date _____

RWC (Lancaster Only) _____

ATTACHMENT III.D.2

Example Recertification Form

Generator Waste Profile Re-Certification for Non-Hazardous Waste Stream

Date: _____

Customer Name: _____

Waste Generator Name: _____

Name of Waste Stream: _____

Profile Number: _____

This letter is being submitted to certify that the above Generator Waste Profile is in compliance with State regulations and VLS:

1. There has been no change to the process at the generating facility that changed the characteristics of the waste.
2. There have not been regulatory changes that would make any modifications necessary.

This waste stream has been fully characterized as indicated on the original certified "Generator's Waste Profile" (GWP). None of the pertinent chemical and physical data as shown on the GWP has changed. Also, any submitted MSDS sheets and analytical data remain accurate.

Signature: _____ Title: _____

Printed Name: _____ Company: _____

ATTACHMENT III.D.3

Frequency and Analytical Methods

FREQUENCY AND ANALYTICAL METHODS

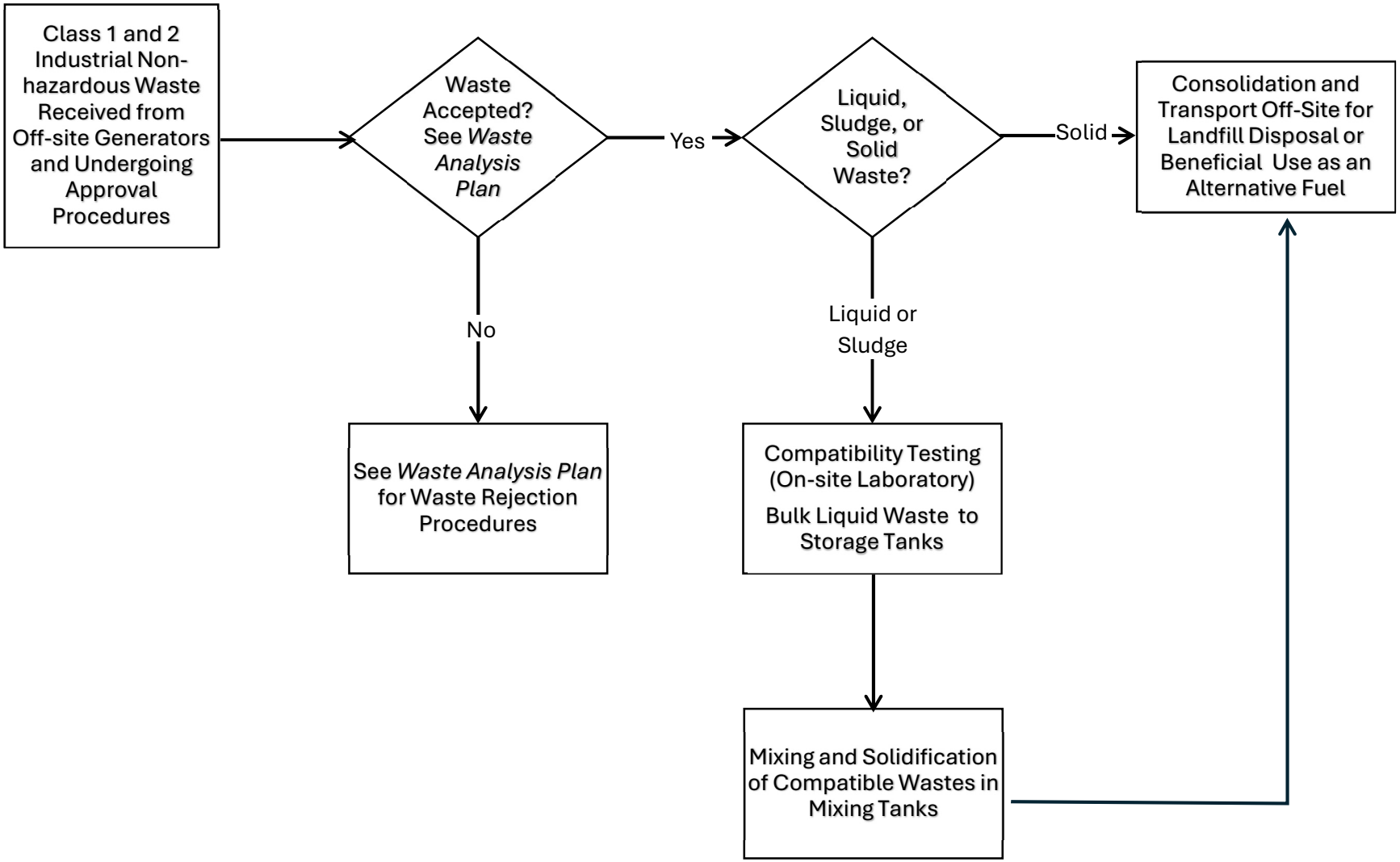
Parameter	Sampling Location	Sampling Method	Frequency	Test Method*
pH	Grab sample from received container (e.g., drum, roll-off box, etc.)	Coliwasa, bottle, dipper, pump, scoop, shovel, auger, trier	Every received waste with an estimated aqueous liquid fraction of more than 10%	SW-846 Method 9040C
Organic Vapor Analyzer (OVA) Screening	See above	See above	Every received waste with an estimated aqueous liquid fraction of more than 10%	Containers exhibiting an OVA reading of greater than 50 ppm above background readings will be considered to have organic vapors present
Flashpoint	See above	See above	All containers with a ≥ 50 ppm OVA reading and a free liquid layer	ASTM D-93-15a, D-3278-96, SW-846 1010A, 1020B
Volatile organic constituents	See above	See above	As needed	SW-846 8260B, 8021B
Semi-volatile and other organic constituents	See above	See above	As needed	SW-846 8270D, 8275A
Metals content	See above	See above	As needed	SW-846 6010D, 6020B, EPA Method 200.7
PCB content	See above	See above	As needed	SW-846 8275A
Total petroleum hydrocarbons content	See above	See above	As needed	TCEQ1005, modified SW-846 8015C, SW-846 9074
Cyanide	See above	See above	As needed	SW-846 Chapter 7, Section 7.3.3, SW-846 9010C, 9012B, 9013A, 9014
Halogen content	See above	See above	As needed	EPA Method 300.0, ASTM D4327-11, SW-846 9022
Hydrogen Sulfide	See above	See above	As needed	SW-846 Chapter 7, Section 7.3.4, SW-846 9034
Reactivity	See above	See above	As needed	SW-846 Chapter 7, Section 7.3, ASTM E537-12, ASTM E2012-06(2012)
Toxicity Characteristic Leaching Procedure (TCLP) determination	See above	See above	As needed	SW-846 1311 coupled with other analyses as listed above

*or an updated version of the method listed, as described in "Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods" (EPA SW-846), "Methods for Chemical Analysis of Water and Wastes" (EPA-600/4-79/020), "Standard Methods for the Examination of Water and Wastewater", or American Society for Testing and Materials (ASTM) methods.

ATTACHMENT IV.B

Process Flow Diagram and Description

Facility Process Flow Diagram



FACILITY PROCESS FLOW DESCRIPTION

1. Solid Waste Receiving and Acceptance

See Waste Analysis Plan (Attachment III.D) for waste receiving and acceptance procedures.

2. Solid Waste Processing

For wastes processed at the VLS New Braunfels non-hazardous waste processing facility (Facility), a scanned electronic copy of the waste profile and signed shipping document (waste manifest or bill of lading) is retained by the Facility and a signed copy of the shipping document is returned to the generator.

A. Waste streams will either be processed independently or will be mixed with other compatible wastes. If processed independently, the waste will be segregated and, if needed, solidified prior to being consolidated for transport to its final destination. If compatible with other wastes, the waste material may undergo the process below.

B. Different waste streams may be combined if review of the physical and/or chemical composition of the wastes demonstrates that the waste materials are known to be compatible and/or bench scale testing shows compatibility. As necessary, bench scale testing will be performed to determine if undesired reactions will occur. Bench scale testing may include monitoring pH, volatile emissions using an organic vapor analyzer (OVA), and temperature. These tests will be performed in the on-site laboratory. The Facility maintains an electronic log to document compatibility testing. If the wastes are found to be incompatible, the wastes will be processed independently, packaged independently, and consolidated for shipment to the final disposal or recycling Facility. The consolidation process is described in Section 4.

C. Compatible waste materials are blended together in the Mixing Tank(s) until the material passes the paint filter test. The Operator will add suitable solidification agent into the tank and mix the waste and solidification agent thoroughly. Solidification agents used at the Facility include, but are not limited to, sawdust, kiln ash/dust, or a super absorbent, such as sodium polyacrylate. A log of all solidification agents received and used at the Facility is maintained in paper or electronic format for up to two (2) years.

D. After thorough mixing, the Operator will collect a sample of the solidified material and test for free liquids using the paint filter test (EPA method SW-846/9095). If the waste passes the paint filter test, then the material is considered to be ready for the off-site disposal or recycling. If the waste does not pass the paint filter test, then additional solidification agent will be added until the material passes the paint filter test.

3. Disposal or Recycling of Solidified Wastes

A. Solidified material is loaded directly into a roll-off box, dump trailer, dump truck, or other container for transportation to the disposal or recycling facility.

B. Solidified material shall be shipped to a suitably permitted landfill, recycling facility, or waste-to-energy facility under a waste profile approved by the receiving facility.

C. The Facility will make every effort to recycle or reuse empty containers. Containers that cannot be reused or recycled will be managed as solid waste. Metal containers may be crushed on-site using a drum crusher or with an excavator and recycled as scrap metal.

4. Consolidation Process

A. Wastes may be processed independently and managed in separate containers for various reasons including: incompatibility with other wastes or to ship materials due to time or storage compliance.

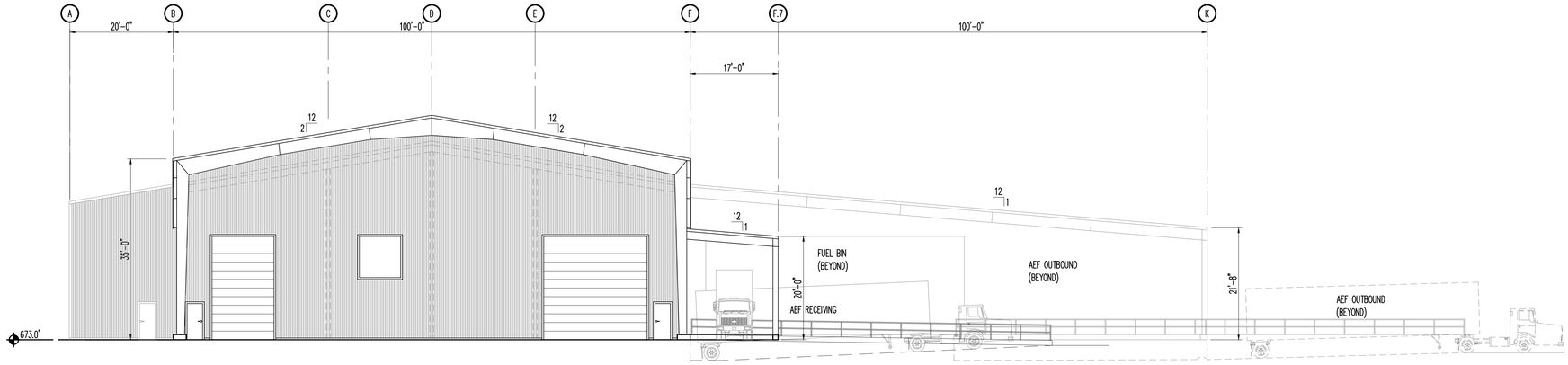
B. After undergoing the solidification process, solidified materials will be containerized and prepared by the Operator for shipment to a suitably permitted landfill, recycling facility or waste-to-energy facility under approved profiles. Prior to transport off-site, each container is examined to confirm (1) the container is correctly labeled, (2) the container is properly closed or covered, and (3) the container is secured to a pallet (if applicable).

C. The Operator will then load the containers onto the transport vehicle and ensure the containers are properly enclosed, strapped down, or barred off.

D. The driver will then be provided with the appropriate paperwork for the designated disposal facility.

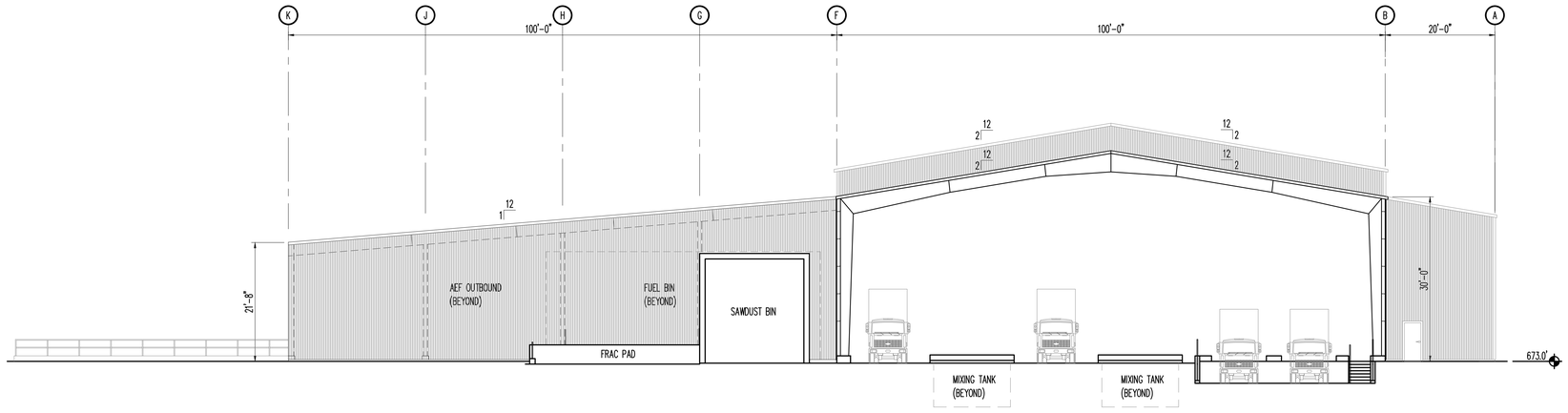
ATTACHMENT IV.F.1

Container Storage Area Drawings



NORTH ELEVATION – AEF RECEIVING & PROCESSING

SCALE : 3/32" = 1'-0"



SOUTH ELEVATION – SOLID WASTE PROCESSING & RECEIVING

SCALE : 3/32" = 1'-0"

REI
ROYAL ENGINEERING INC.
P.O. BOX 17828
GREENVILLE, S.C. 29606
(864)-235-4425
FAX 864-235-1330

NO.	DATE	DESCRIPTION
		PRELIMINARY NOT FOR CONSTRUCTION

10/22/25

VLS ENVIRONMENTAL SOLUTIONS

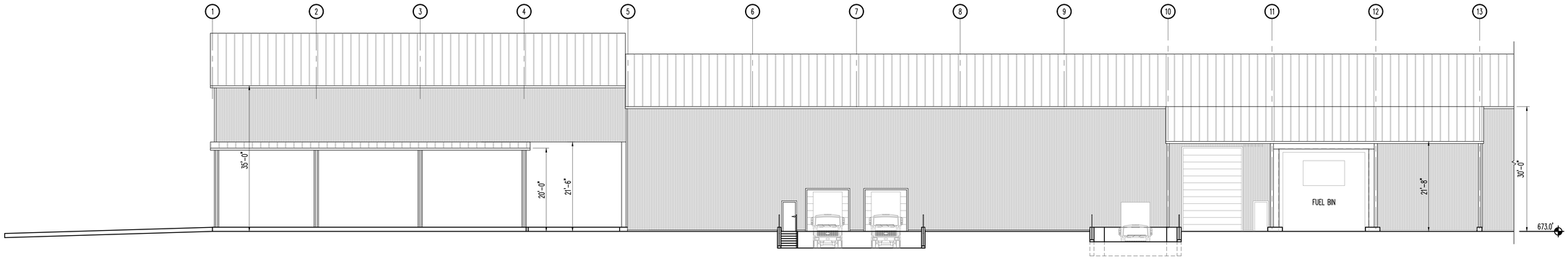
EXTERIOR ELEVATIONS

VLS New Braunfels

5350 Buffalo Ranch Dr.
New Braunfels, TX 78132

DRAWN	CJ
CHECKED	BR
DATE	10-22-25
SCALE	NOTED
JOB NO.	25-006
SHEET	A2.0

3 OF 5 SHEETS



WEST ELEVATION – AEF RECEIVING & OUTBOUND

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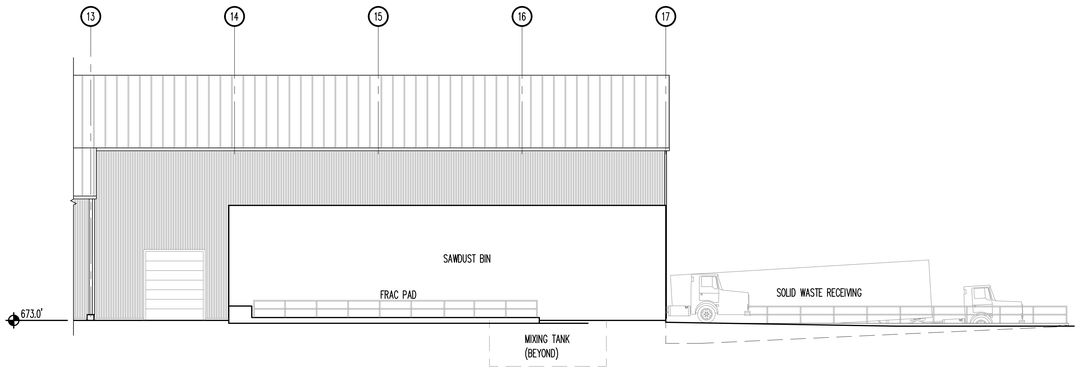
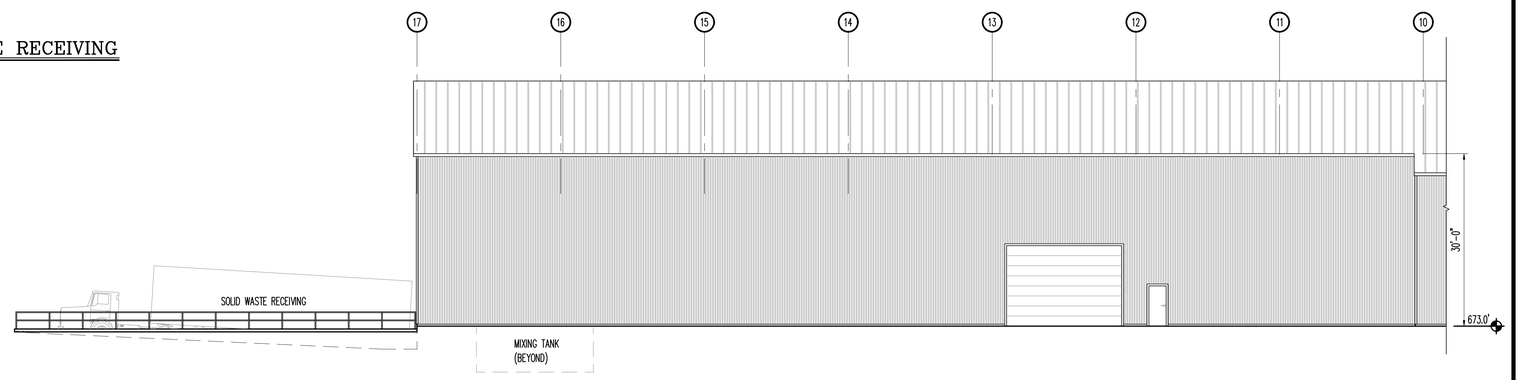


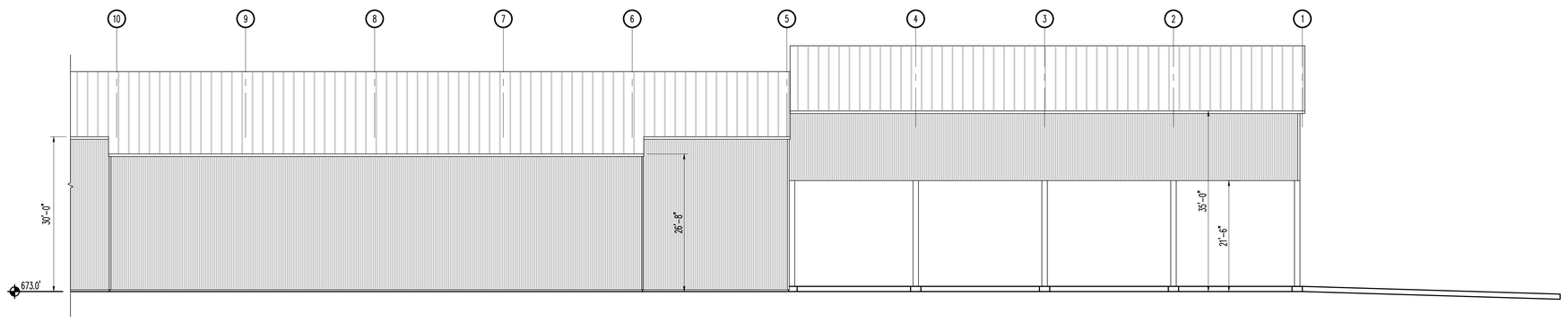
WEST ELEVATION – SOLID WASTE RECEIVING

SCALE : 3/32" = 1'-0"



EAST ELEVATION – SOLID WASTE RECEIVING

SCALE : 3/32" = 1'-0"



EAST ELEVATION – AEF RECEIVING

SCALE : 3/32" = 1'-0"

REI
ROYAL ENGINEERING INC.
P.O. BOX 17828
GREENVILLE, S.C. 29606
(864)-235-4425
FAX 864-235-1330

REVISIONS:

NO.	DATE	DESCRIPTION

PRELIMINARY
NOT FOR CONSTRUCTION

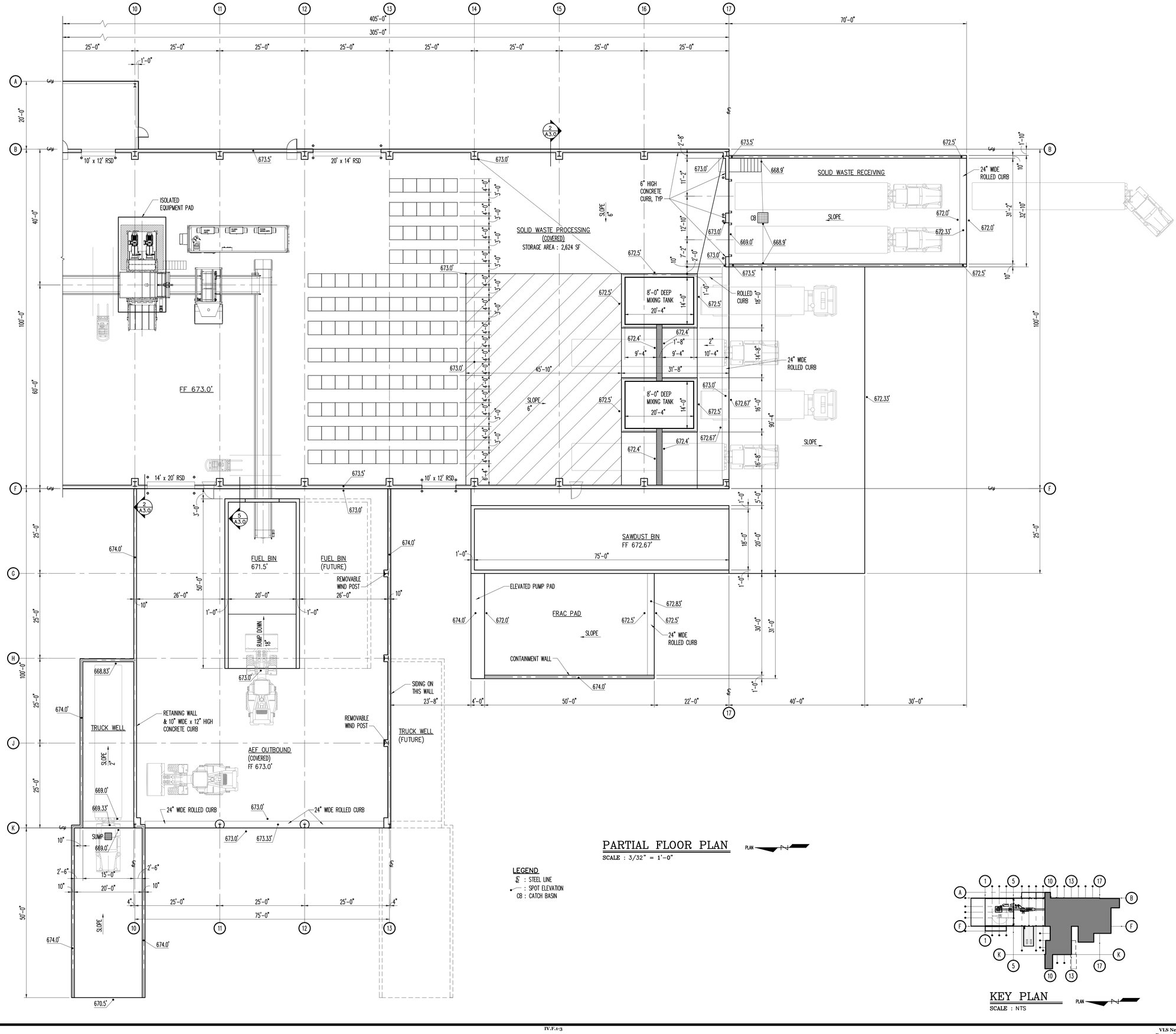
10/22/25

VLS ENVIRONMENTAL SOLUTIONS

EXTERIOR ELEVATIONS
VLS New Braunfels
5350 Buffalo Ranch Dr.
New Braunfels, TX 78132

DRAWN	CJ
CHECKED	BR
DATE	10-22-25
SCALE	NOTED
JOB NO.	25-006
SHEET	A2.1

4 OF 5 SHEETS



PARTIAL FLOOR PLAN

SCALE : 3/32" = 1'-0"

LEGEND
- ℄ : STEEL LINE
- ⟷ : SPOT ELEVATION
- CB : CATCH BASIN

KEY PLAN

SCALE : NTS

REI
ROYAL ENGINEERING INC.
P.O. BOX 17828
GREENVILLE, S.C. 29606
(864)-235-4425
FAX 864-235-1330

NO.	DATE	DESCRIPTION	BY
		PRELIMINARY NOT FOR CONSTRUCTION	

10/22/25

VLS ENVIRONMENTAL SOLUTIONS

PARTIAL FLOOR PLAN – PHASE 1

VLS New Braunfels

5350 Buffalo Ranch Dr.
New Braunfels, TX 78132

DRAWN	CJ
CHECKED	BR
DATE	10-22-25
SCALE	NOTED
JOB NO.	25-006
SHEET	A1.1

2 OF 5 SHEETS

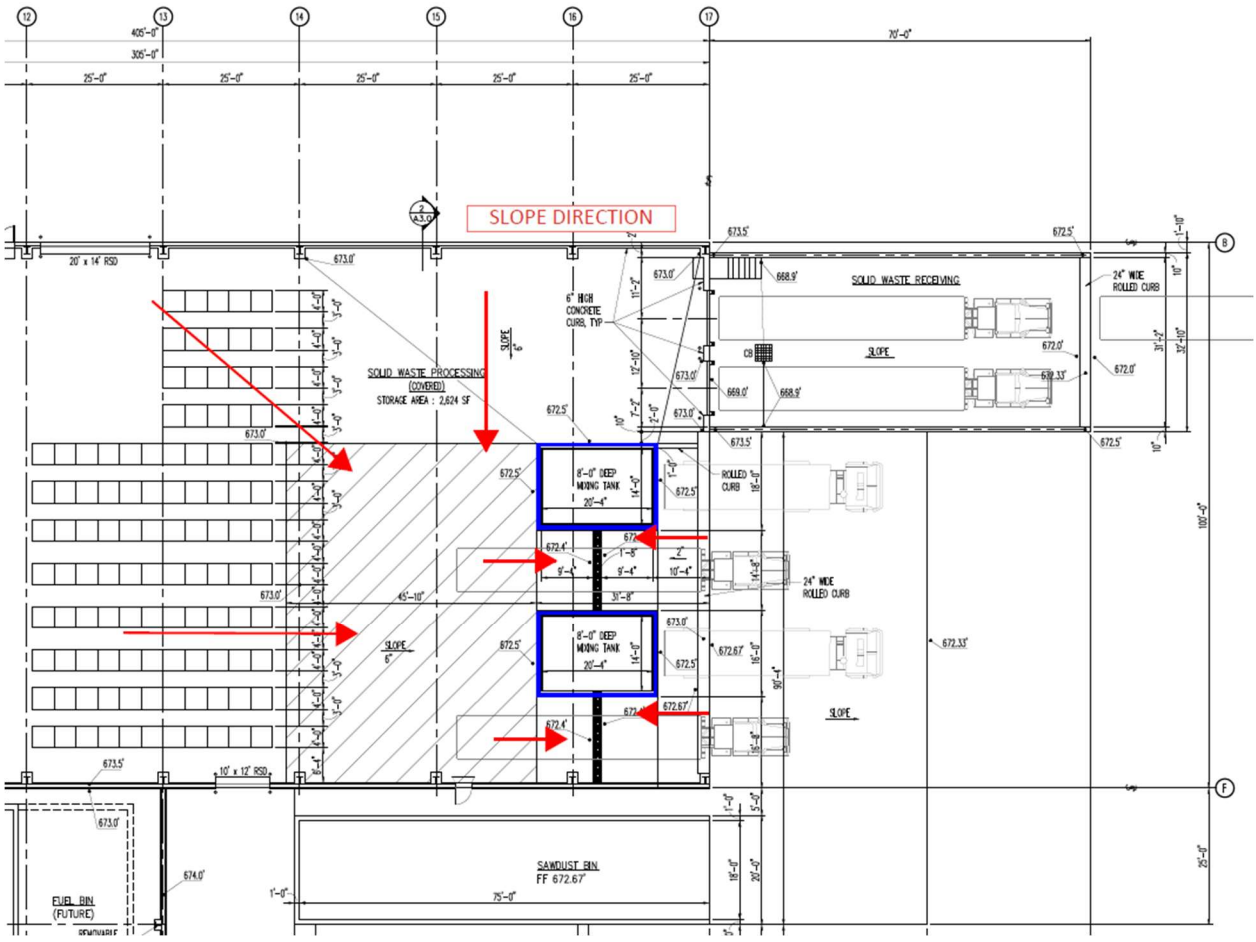
ATTACHMENT IV.F.2

Container Storage Area Engineering Description

CONTAINER STORAGE AREA ENGINEERING DESCRIPTION

The VLS New Braunfels non-hazardous waste processing facility (Facility) accepts non-hazardous industrial wastes for processing through consolidation, solidification, or recycling. There is one container storage area (CSA) within the waste processing section of the Facility (see Attachment IV.F.1). The CSA is designed to store up to 1,296 55-gal container equivalents (71,280 gallons) of waste, assuming triple-stacked palleted containers with four containers per pallet.

The secondary containment for the CSA was designed to provide sufficient capacity to contain the greater of ten percent (10%) of the total volume of containers and the volume of the largest container. Because only smaller containers will be stored in the CSA, 10% of the maximum storage capacity of the CSA (i.e., 7,128 gal) is the greater of the two scenarios. The required secondary containment for the CSA is provided by the two 16,000 gal mixing tanks. As detailed in Attachment IV.F.1 and shown schematically below, the CSA floor slopes from all directions towards the drainage trenches which convey flow to the two mixing tanks. Further, the slope and curbing of the waste processing area provides addition volume for storage of liquids.



Materials of Construction

The waste processing area, including the CSA, has a 8-in or 12-inch thick reinforced concrete slab floor sloped toward the floor trench drains. The 4,000-psi concrete slabs are designed to withstand the load from the maximum storage capacity of the CSA. The floor must also be maintained free of significant cracks or gaps. To provide this water stops are provided at concrete joints, and the concrete surface is regularly inspected.

Run-On and Overflow Prevention

The site is graded to direct stormwater run-off from the site to Channel A (west side of the Waste Processing Building) or Channel B (east side of the Waste Processing Building), which convey run-off to the detention pond northwest of the main facility building. The pond discharges water into the floodplain of Dry Comal Creek (see Attachment II.A).

The CSA is isolated from precipitation and run-on by locating the unit within the main building at the Facility. The building has a framed structure with a roof and concrete slab floor constructed on an elevated platform of compacted fill. A 6-inch curb will be maintained around the entire building for additional run-on and overflow protection. The concrete slab floor of the CSA is sloped towards the floor trench drains within the waste processing area that collect and remove liquids resulting from leaks or spills. The floor trench drains, in turn, convey liquids to the Mixing Tanks.

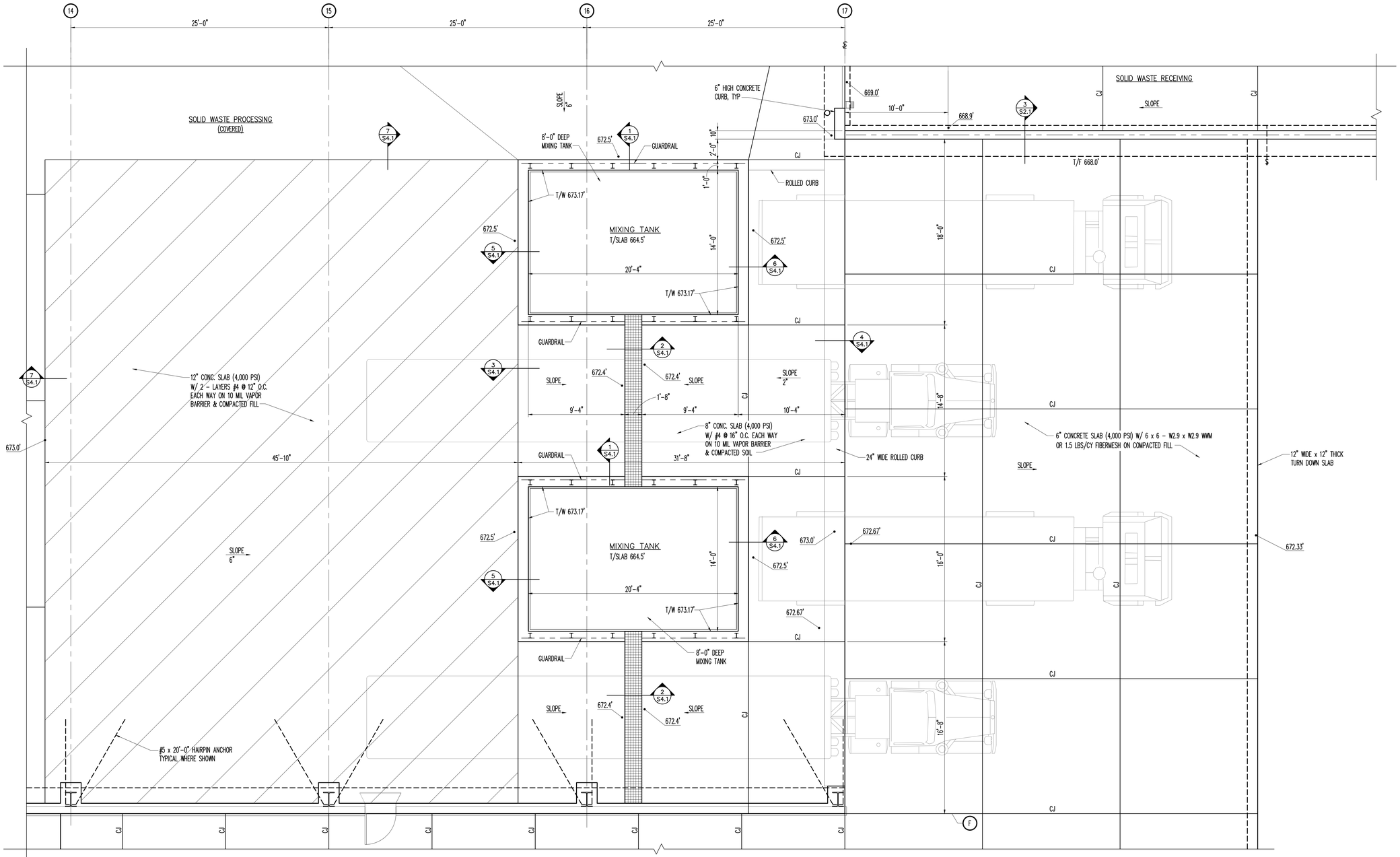
There are covered concrete drives or a ramp to the top of perimeter curbing for the waste processing area at all waste receiving points on the southern side of the Waste Processing Building (see Attachment IV.F.1). The ramp used for unloading containers is sloped towards a self-contained floor drain, which will be emptied in a timely manner to prevent overflow of collection systems, should a release occur. There is also a 4-inch high rolled curb on the south side of the ramp to prevent run-off from entering the ramp.

Container Management Practices

The CSA will be maintained using good housekeeping practices. All containers are required to be constructed using materials that are compatible with the waste they store. Any visibly damaged containers will be removed and waste will be transferred into a container in good condition. Containers will be stored in rows with adequate unobstructed aisle space to allow handling and emergency equipment to access containers. Containers greater than 30 gallons will not be stacked more than three high.

ATTACHMENT IV.G.1

Mixing Tank Drawings



FOUNDATION PLAN – MIXING TANKS

SCALE : ¼" = 1'-0"

PLAN N

LEGEND

℄ : STEEL LINE
T/W : TOP OF WALL ELEVATION
CJ : SAWED CONTROL JOINT

MATERIAL SPECIFICATIONS

CONCRETE : 4,000 PSI @ 28 DAYS
REBAR : GRADE 60
STEEL SHAPES & PLATES : A36
WELDS : E70XX
WATER STOP : LOCKSTOP BY SIKA, OR EQUAL

REI
ROYAL ENGINEERING INC.
P.O. BOX 17828
GREENVILLE, S.C. 29606
(864)-235-4425
FAX 864-235-1330

REVISIONS:
NO. DATE DESCRIPTION
PRELIMINARY
NOT FOR CONSTRUCTION

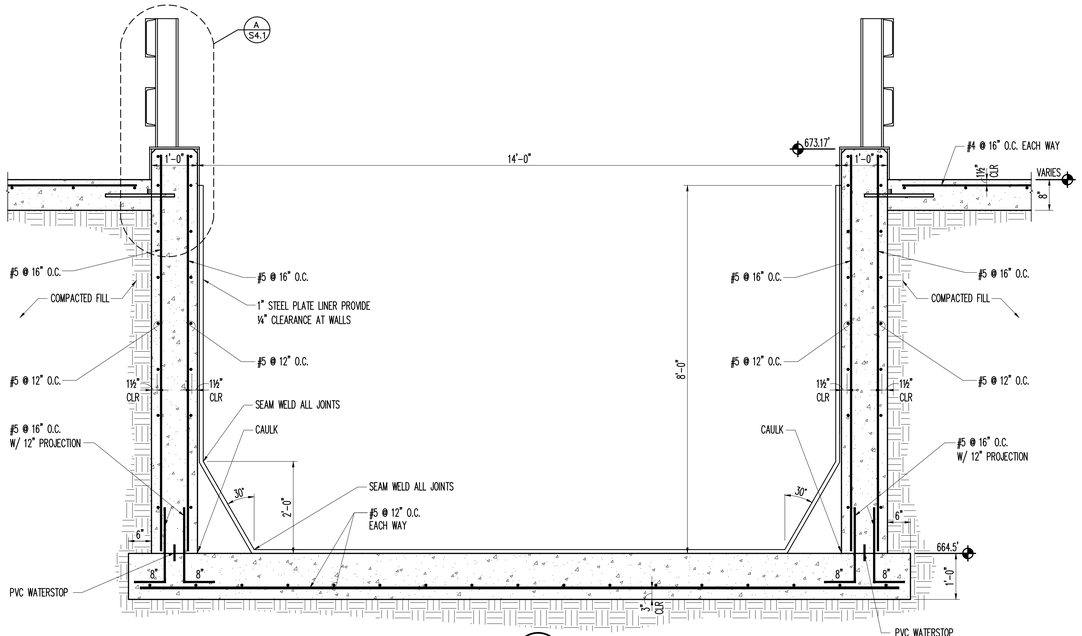
10/22/25

VLS ENVIRONMENTAL SOLUTIONS

FOUNDATION PLAN – MIXING TANKS
VLS New Braunfels
5350 Buffalo Ranch Dr.
New Braunfels, TX 78132

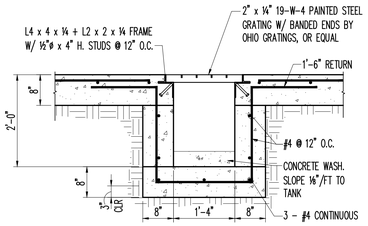
DRAWN	CJ
CHECKED	BR
DATE	10-22-25
SCALE	NOTED
JOB NO.	25-006
SHEET	S4.0

9 OF 12 SHEETS

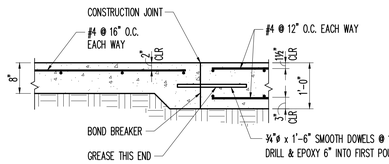


SECTION 1 — SCALE : ¾" = 1'-0" — S4.1

NOTE : SEE DETAIL B/S4.1 FOR CORNER DETAIL



SECTION 2 — SCALE : ¾" = 1'-0" — S4.1



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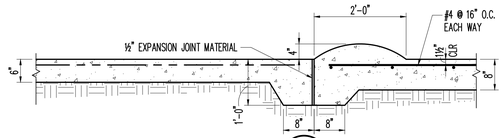
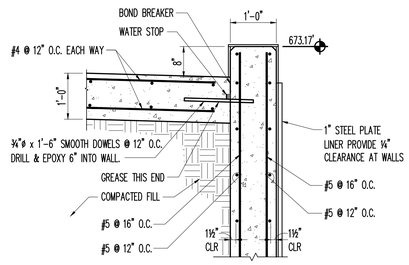
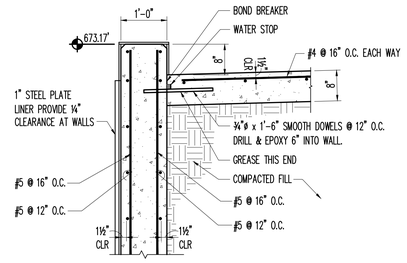


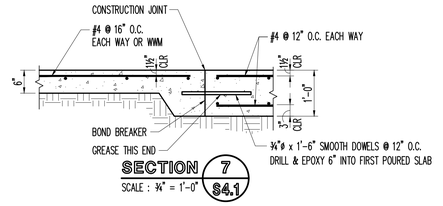
SECTION 4 — SCALE : ¾" = 1'-0" — S4.1



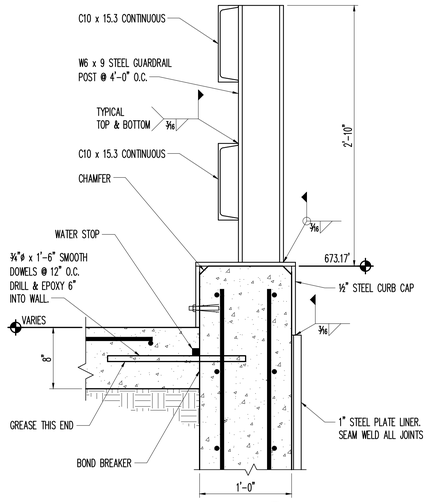
SECTION 5 — SCALE : ¾" = 1'-0" — S4.1



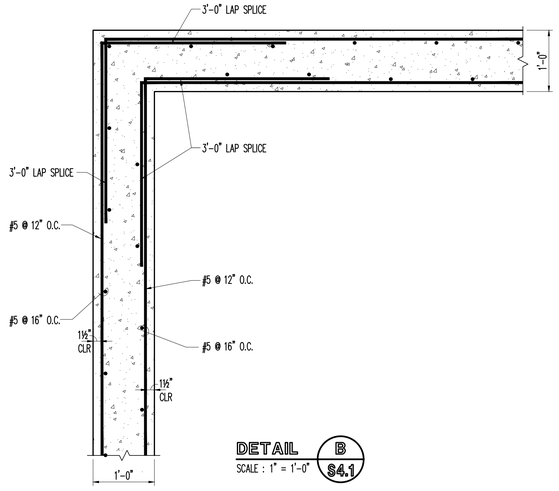
SECTION 6 — SCALE : ¾" = 1'-0" — S4.1



SECTION 7 — SCALE : ¾" = 1'-0" — S4.1



DETAIL A — SCALE : 1½" = 1'-0" — S4.1



DETAIL B — SCALE : 1" = 1'-0" — S4.1

REI
ROYAL ENGINEERING INC.
P.O. BOX 17828
GREENVILLE, S.C. 29606
(864)-235-4425
FAX 864-235-1330

NO.	DATE	DESCRIPTION
		PRELIMINARY NOT FOR CONSTRUCTION

10/22/25

VLS ENVIRONMENTAL SOLUTIONS

SECTIONS & DETAILS – MIXING TANKS

VLS New Braunfels

5350 Buffalo Ranch Dr.
New Braunfels, TX 78132

DRAWN	CJ
CHECKED	BR
DATE	10-22-25
SCALE	NOTED
JOB NO.	25-006
SHEET	S4.1

10 OF 12 SHEETS

ATTACHMENT IV.G.3

Tanks Engineering Description

MIXING TANK SYSTEMS ENGINEERING DESCRIPTION

The Facility accepts non-hazardous industrial wastes for processing through consolidation, solidification, mixing, or recycling. There are two open Mixing Tanks, each with a capacity of approximately 16,000 gallons, within the waste processing area (see Attachment IV.F.1). Non-hazardous waste materials are added to the Mixing Tanks and mixed with solidification agents. Alternative Engineered Fuel (AEF) may also be mixed with non-hazardous waste and reagents in the tanks. The mixing action in the Mixing Tanks is provided by external equipment.

Materials of Construction

The Mixing Tanks will be constructed with a 1-inch steel plate liner within a 14 foot by 20.3 foot by 8 foot deep concrete box (Attachment IV.G.1). The reinforced concrete box is 12 inches thick. The steel plate liner provides waste containment and protects the concrete during mixing. The reinforced concrete provides structural support for the steel liner and a foundation for the tank. The reinforced concrete will extend 8 inches above the concrete slab floor of the waste processing area except where it intersects the floor drains. The Mixing Tanks are designed to withstand the maximum capacity of the Mixing Tanks and the forces exerted from the external mixing equipment.

Run-On and Overflow Prevention

The site is graded to direct stormwater run-off from the site to Channel A (west side of the Waste Processing Building) or Channel B (east side of the Waste Processing Building), which convey run-off to the detention pond northwest of the main facility building. The pond discharges water into the floodplain of Dry Comal Creek (see Attachment II.A).

Similar to the CSA, the Mixing Tanks are isolated from precipitation and run-on by locating them unit within the main building at the Facility. The building has a framed structure with a roof and concrete slab floor constructed on an elevated platform of compacted fill. The reinforced concrete walls on the Mixing Tanks extend 8-inches above the concrete slab floor to prevent run-on and for overflow protection. A 6-inch curb will be maintained around the entire building for additional run-on and overflow protection. Further, the concrete slab floor of the waste processing area is sloped towards the floor trench drain, which convey liquid into the Mixing Tanks. No incompatible wastes will be accepted and/or stored in the waste processing area, so any released or spilled material can be routed to the Mixing Tanks for treatment and disposal or recycling.

Tank Systems Management Practices

The Mixing Tanks will be maintained using good housekeeping practice. Visual inspections of the Mixing Tanks will occur weekly. Weekly inspections will evaluate for any cracks or gaps in the steel plate liner for leakage. The Mixing Tanks will be removed from service if any cracks or gaps in the steel plate liner are discovered or if a leak is detected until the Mixing Tank can be repaired.

STORAGE TANK SYSTEM ENGINEERING DESCRIPTION

The Facility accepts non-hazardous industrial wastes for processing through consolidation, solidification, or recycling. There will be two approximately 20,000-gallon Storage Tanks located adjacent to the waste processing building (See Attachment IV.F.1). Non-hazardous liquid wastes will be pumped into the Storage Tanks for storage until ready to be treated. The non-hazardous liquid waste material will then be added to the Mixing Tanks and will be mixed with solidification agents.

Materials of Construction

The Storage Tanks are closed-top horizontal frac tanks constructed with double-walled 1/4-inch thick carbon steel panels with double-welded seams. The Storage Tanks are designed to withstand their permitted capacity. The interior is epoxy coated for durability. The tanks are securely fastened to the reinforced concrete frac pad. The pad has reinforced concrete walls around its perimeter that extend 1.5 feet or more above the frac pad. As the tanks are not located under cover, precipitation collected in the supplemental containment around the double-walled tanks is required to be routinely removed.

The Storage Tanks will be installed with spill prevention controls, manual controls, and vents as discussed in more detail in the Tank Systems Practices section.

Run-On and Overflow Prevention

The Storage Tanks will be isolated from run-on by means of the concrete walls encompassing the two tanks. The frac pad will be sloped to the north where a sump is located to remove accumulated precipitation. The accumulated precipitation will be disposed of in an appropriate manner.

Tank Systems Practices

Spill prevention controls for truck unloading, such as check valves and quick connect couplings, will be used for the Storage Tanks. Visual inspections of the tanks and containment structures will occur weekly. Weekly inspections will evaluate for any cracks or gaps in the steel tanks and/or the concrete pad and containment wall. The Storage Tanks will be removed from service if any cracks or gaps are discovered or if a leak is detected until the repair is made.

ATTACHMENT VII.A.2

Closure Plan

CLOSURE PLAN

1. INTRODUCTION

This Closure Plan for the VLS New Braunfels non-hazardous waste processing facility (Facility) describes how the waste management units at the Facility (Container Storage Area, Storage Tanks, and Mixing Tanks) will be closed. Wastes will be received at the Facility no fewer than 30 days prior to the anticipated closure date. The date for final waste processing will be included in the Notice of Closure submitted to the Texas Commission on Environmental Quality (TCEQ).

The remainder of this Closure Plan is organized as follows:

- the maximum extent of unclosed operations and maximum inventory waste on-site during the active life of the Facility is discussed in Section 2;
- the closure plan for the Container Storage Area is presented in Section 3;
- the closure plan for the Storage Tanks is presented in Section 4; and
- the closure plan for the Mixing Tanks is presented in Section 5.

2. MAXIMUM EXTENT OF OPERATIONS AND WASTE INVENTORY

This Closure Plan describes the steps necessary to perform partial closure of one or more of the waste management units while the Facility is operation and closure of all of the units during final Facility closure. Closure of one or more units (i.e., partial closure) could occur due to modification of operations or the end of the useful service life of a unit. The maximum extent of operations which will be unclosed during the active of the Facility would occur when all of the proposed waste management units have been constructed and are in operation. The proposed waste management units and their capacities are listed in Table I.

The maximum inventory of wastes ever on-site over the active life of the Facility would occur when the Facility is at its maximum extent of operations with all proposed waste management units constructed and with all units containing their permitted volume of waste. Thus, the maximum volume of waste ever on site during the Facility's active life is estimated to be approximately 143,280 gallons.

3. CONTAINER STORAGE AREA CLOSURE PLAN

3.1 General Information

At closure, VLS will process or remove any remaining waste containers in the area and decontaminate, as necessary, the secondary containment system. To verify that clean closure of the secondary containment system is achieved, VLS will conduct closure activities and sampling and analysis as described in Section 3.2 of this plan.

When closure occurs, VLS will provide a copy of this closure plan to the TCEQ with the Notification of Closure letter (if required by the permit). In the event that VLS proposes amendments to this Closure Plan based on changes in the operating plans or Facility design that

may affect closure implementation, a permit modification will be submitted to the TCEQ for review and approval. Closure Plan amendments may also be proposed as result of unexpected events that occur during closure.

3.2 Closure Activities

The methodology for closure of the Container Storage Area will consist of several steps designed to remove waste from and subsequently decontaminate, as necessary, the secondary containment system. The steps that will be used to close the Container Storage Area are as follows:

- All remaining waste containers will be removed and transported off-site for treatment, recycling or disposal at an authorized facility.
- The Container Storage Area will be flushed using potable water to remove any waste residues. Wash waters will be collected, containerized and transported off-site for treatment, recycling or disposal.

Certain situations may warrant optional cleaning methods which may include: hydroblasting, detergent wash, abrasive cleaning, and steam cleaning. Optional cleaning methods will be outlined, as necessary, in the Notification of Closure letter.

Closure activities will involve reviewing inspection information, talking with operating personnel, and inspecting the secondary containment to determine if there is visual evidence that spills/leaks have occurred or to determine if the secondary containment has cracks or other integrity problems that would necessitate additional investigation or sampling. The closure report will either document a finding that no such spills/leaks had occurred or that the spills/leaks that had occurred did not result in a release to the environment.

3.3 Sampling and Analysis

Sampling of the water rinsate generated from flushing activities will be performed to demonstrate adequate decontamination. Analyses of the collected samples will be performed by a TCEQ-approved National Environmental Laboratory Accreditation Program (NELAP) certified testing laboratory that is familiar with analytical methods for solid waste.

To confirm that adequate decontamination has been achieved, VLS will analyze for indicator constituents. Indicator constituents proposed to demonstrate decontamination of the secondary containment system will be based on those constituents (i.e., volatile and semi-volatile organics) which are representative of the wastes which have been managed in the Container Storage Area. If the applicable critical Protective Concentration Level (PCL) for Remedy Standard A according to the Texas Rusk Reduction Program (TRRP) in Title 30 Texas Administrative Code (TAC) Chapter 350 [30 TAC Chapter 350] is exceeded for an indicator constituent, additional rinsing activities will be performed until acceptable analytical results are received for closure.

If the integrity of the secondary containment structure may have been compromised during operations which may have allowed leaked or spilled material to reach underlying or surrounding soils, such a release will be responded to outside the scope of this closure plan in accordance with the TRRP.

3.4 Decontamination

Following completion of closure and receipt of analytical results demonstrating decontamination, equipment that may have been contaminated during closure will be decontamination. Decontamination will generally consist of rinsing with water; however, any of the methods used for decontamination of the secondary containment system may also be used.

3.5 Safety, Health and Emergency Response

Appropriate protocols for health and safety procedures will be followed during closure activities. These will address health, safety, and emergency response aspects for personnel associated with the closure of the Container Storage Area and secondary containment system. The protocols cover the following topics:

- Selection of appropriate personal protection equipment;
- Establishment of work zones;
- Decontamination procedures; and
- Emergency response procedures.

When the closure activities have been completed and a successful demonstration of decontamination through analytical results has been accomplished, a closure certification report will be prepared and submitted to TCEQ. Certification of closure will be submitted within 60 days after the completion of the closure activities. The certification will be signed by VLS and by a Texas-registered, professional engineer and will certify that the unit has been closed in accordance with this approved Closure Plan. This certification will be sent via certified mail to the Executive Director of the TCEQ.

3.6 Closure Schedule

Following receipt of the final volume of waste in the Container Storage Area, VLS will initiate closure of that unit. The time for closure of the Container Storage Area is estimated to be approximately 180 days and is based on the following activities:

- Removal of waste containers from the unit and rinsing, as necessary, of the secondary containment system; and
- Verification of decontamination and completion closure activities.

The proposed schedule for closure of the Container Storage Area is:

Activity	Timing
TCEQ Notification of Closure (if required by permit)	≥30 Days Prior to Final Volume of Waste to Unit
Final volume of waste to unit	Day 0
Removal of containerized waste	By Day 90

Activity	Timing
Rinsing of secondary containment and disposal of rinsate	
Final rinse of secondary containment and collection of samples for demonstration of decontamination	By Day 180
Verification of decontamination	
Completion of closure activities	

4. STORAGE TANK CLOSURE PLAN

4.1 General Information

At closure, VLS will remove any waste remaining in the Storage Tanks and decontaminate the tanks, associated ancillary equipment, and, as necessary, the frac pad. To verify that removal of waste and clean closure of the tanks, frac pad, and associated ancillary equipment is achieved, VLS will conduct closure activities and sampling and analysis as specified in Section 4.2 of this plan.

When closure occurs, VLS will provide a copy of this closure plan to the TCEQ with the Notification of Closure Letter. In the event that VLS proposes amendments to this Closure Plan based on changes in the operating plans or Facility design that may affect closure implementation, a permit modification will be submitted to the TCEQ for review and approval. Closure Plan amendments may also be proposed as a result of unexpected events that occur during closure.

4.2 Closure Activities

The methodology for closure of the Storage Tanks will consist of several steps designed to remove waste from and decontaminate the tanks, associated ancillary equipment, and the frac pad in accordance with 30 TAC 335.8. The steps to be used to close the Solidification/Mixing Tanks are as follows:

- All waste remaining in the tank and/or ancillary equipment will be removed and transported off-site for treatment, recycling or disposal at an authorized facility.
- The tanks, ancillary equipment, and frac pads will be flushed using potable water to remove any waste residues. Wash waters will be collected, containerized, and transported off-site for treatment, recycling, or disposal.
- The tanks will be removed, cleaned using appropriate rinsate, and sent for recycling.

Certain situations may warrant optional cleaning methods which may include: hydroblasting, detergent wash, abrasive cleaning, or steam cleaning. Optional cleaning methods will be outlined, as necessary, in the Notification of Closure letter (if required by the permit).

Run-off and run-on will be controlled during closure by maintaining the curbing associated with the frac tank pad until the closure activities, including decontamination, are completed. The

Storage Tanks are double-walled to prevent the flow of spills/leaks to the frac pad. Closure activities will involve review of inspection information, interviews with operating personnel, and inspection of the Storage Tanks and frac pad. Closure activities will be conducted to determine if there is visual evidence of spills or leaks from the Storage Tanks or if there are cracks or other evidence that the integrity of the frac pad has been compromised. The closure report will either document a finding that no such spills/leaks had occurred or that the spills/leaks that had occurred did not result in a release to the environment.

4.3 Sampling and Analysis

Sampling of the water rinsate generated from rinsing activities will be performed to demonstrate decontamination. Analyses of the collected samples will be performed by a TCEQ-approved NELAP certified testing laboratory that is familiar with analytical methods for solid waste.

To confirm that adequate decontamination has been achieved, VLS will analyze for indicator constituents. Indicator constituents proposed to demonstrate decontamination of the frac pad and associated ancillary equipment will be based on those constituents (i.e., volatile and semi-volatile organics) that are representative of the wastes which have been managed in the Storage Tanks. If the applicable critical PCL for Remedy Standard A according to the TRRP in Title 30 TAC Chapter 350 is exceeded for an indicator constituent, additional rinsing activities will be performed until acceptable analytical results are achieved for closure.

If the integrity of the frac pad may have been compromised during operations which may have allowed leaked or spilled material to reach underlying or surrounding soils, such a release will be responded to outside the scope of this closure plan in accordance with the TRRP.

4.4 Decontamination

Following completion of closure and receipt of analytical results demonstrating decontamination of the unit, equipment that became contaminated during closure will be decontaminated. Decontamination will generally consist of rinsing with water; however, any of the methods used for decontamination of the Storage Tanks and frac pad may also be used.

4.5 Safety, Health and Emergency Response

Appropriate protocols for health and safety procedures will be followed during closure activities. These will address health, safety, and emergency response aspects for personnel associated with the closure of the Storage Tanks and frac pad. The protocols cover the following topics:

- Selection of appropriate personal protection equipment;
- Establishment of work zones;
- Decontamination procedures; and
- Emergency response procedures.

When the closure activities have been completed and a successful demonstration of decontamination through analytical results has been accomplished, a closure certification report will be prepared and submitted to TCEQ. Certification of closure will be submitted within 60 days

after the completion of the closure activities. The certification will be signed by VLS and by a Texas-registered, professional engineer and will certify that the unit has been closed in accordance with this approved Closure Plan. This certification will be sent via certified mail to the Executive Director of the TCEQ.

4.6 Closure Schedule

Following receipt of the final volume of waste in the Storage Tanks, VLS will initiate closure of the tanks and their associated ancillary equipment. The time for closure of the Storage Tanks is estimated to be approximately 180 days and is based on the following activities:

- Removal of waste from tank and associated ancillary equipment;
- Flushing with suitable solvent, removal of waste/solvent mixture, and subsequent treatment/disposal;
- Final rinsing of tank/ancillary equipment and collection of samples for demonstration of decontamination; and
- Verification decontamination and complete closure activities.

The proposed schedule for closure of a Storage Tank is:

Activity	Timing
TCEQ Notification of Closure (if required by permit)	≥30 Days Prior to Final Volume of Waste to Unit
Final volume of waste to unit	Day 0
Removal of waste from tank and ancillary equipment	By Day 90
Flushing of tank/ancillary equipment and removal and treatment/disposal of waste/water mixture	
Final rinse of tank/ancillary equipment and collection of samples for demonstration of decontamination	By Day 180
Verification of decontamination	
Completion of closure activities	

5. SOLIDIFICATION/MIXING TANK CLOSURE PLAN

5.1 General Information

At closure, VLS will remove any material remaining in the Solidification/Mixing Tanks and decontaminate the Solidification/Mixing Tanks, associated ancillary equipment, and secondary containment system. To verify that removal of waste and clean closure of the tanks, secondary containment system, and associated ancillary equipment is achieved, VLS will conduct closure activities and sampling and analysis as specified in Section 5.2 of this plan.

When closure occurs, VLS will provide a copy of this closure plan to the TCEQ with the Notification of Closure Letter. In the event that VLS proposes amendments to this Closure Plan based on changes in the operating plans or Facility design that may affect closure implementation, a permit modification will be submitted to the TCEQ for review and approval. Closure Plan amendments may also be proposed as a result of unexpected events that occur during closure.

5.2 Closure Activities

The methodology for closure of the Solidification/Mixing Tanks will consist of several steps designed to remove waste from and decontaminate the tanks, associated ancillary equipment, and the secondary containment system in accordance with 30 TAC 335.8. The steps to be used to close the Solidification/Mixing Tanks are as follows:

- All waste remaining in the tank and/or ancillary equipment will be removed and transported off-site for treatment, recycling or disposal at an authorized facility;
- The tank and ancillary equipment will be flushed using potable water to remove any waste residues. Wash waters will be collected, containerized, and transported off-site for treatment, recycling, or disposal.
- The steel tank will be removed, cleaned using appropriate rinsate and sent for recycling.
- The concrete secondary containment will be triple-flushed using potable water. Rinsate water will be collected, containerized and transported off-site for treatment, recycling, or disposal.

Certain situations may warrant optional cleaning methods which may include: hydroblasting, detergent wash, abrasive cleaning, or steam cleaning. Optional cleaning methods will be outlined, as necessary, in the Notification of Closure letter (if required by the permit).

Run-off and run-on will be controlled during closure by maintaining the curbing associated with the Waste Processing Building until the closure activities, including decontamination, are completed. The Solidification/Mixing Tanks have secondary containment system designed to prevent the flow of spills/leaks to surrounding soils. Closure activities will involve review of inspection information, interviews with operating personnel, and inspection of the Solidification/Mixing Tanks and secondary containment. Closure activities will be conducted to determine if there is visual evidence of spills or leaks form the Solidification/Mixing Tanks or if there are cracks or other evidence that the integrity of the secondary containment has been compromised. The closure report will either document a finding that no such spills/leaks had occurred or that the spills/leaks that had occurred did not result in a release to the environment.

5.3 Sampling and Analysis

Sampling of the water rinsate generated from rinsing activities will be performed to demonstrate decontamination. Analyses of the collected samples will be performed by a TCEQ-approved NELAP certified testing laboratory that is familiar with analytical methods for solid waste.

To determine if decontamination has been achieved, VLS will analyze for indicator constituents. Indicator constituents proposed to demonstrate decontamination of the tank, secondary containment system, and associated ancillary equipment will be based on those constituents (i.e., volatile and semi-volatile organics) that are representative of the wastes which have been managed in the tanks. VLS will also analyze samples of the (raw) decontamination wash water for indicator constituents to ensure an appropriate baseline for the rinsate is established. If the applicable critical PCL for Remedy Standard A according to the TRRP in 30 TAC Chapter 350 is exceeded for an indicator constituent, additional closure activities as described in the above section will be performed until acceptable analytical results are achieved for closure.

If areas are identified within the secondary containment structure that exhibit signs of deterioration or compromise, soil sampling will be performed adjacent to, and potentially beneath, the secondary containment system to confirm the presence or absence of soil contamination. Analyses will be performed by a testing laboratory that is familiar with analytical methods for hazardous and solid waste and is appropriately certified. Indicator constituents proposed will be based on those constituents that are representative of the waste materials which have been managed in the tank.

If the integrity of the secondary containment may have been compromised during operations which may have allowed leaked or spilled material to reach underlying or surrounding soils, such a release will be responded to outside the scope of this closure plan in accordance with the TRRP.

5.4 Decontamination

Following completion of closure and receipt of analytical results demonstrating decontamination of the unit, equipment that became contaminated during closure will be decontaminated. Decontamination will generally consist of rinsing with water; however, any of the methods used for decontamination of the Solidification/Mixing Tanks and secondary containment may also be used.

5.5 Safety, Health and Emergency Response

Appropriate protocols for health and safety procedures will be followed during closure activities. These will address health, safety, and emergency response aspects for personnel associated with the closure of the tanks, ancillary equipment, and secondary containment system The protocols cover the following topics:

- Selection of appropriate personal protection equipment;
- Establishment of work zones;
- Decontamination procedures; and
- Emergency response procedures.

When the closure activities have been completed and a successful demonstration of decontamination through analytical results has been accomplished, a closure certification report will be prepared and submitted to TCEQ. Certification of closure will be submitted within 60 days after the completion of the closure activities. The certification will be signed by VLS and by a Texas-registered, professional engineer and will certify that the unit has been closed in accordance

with this approved Closure Plan. This certification will be sent via certified mail to the Executive Director of the TCEQ.

5.6 Closure Schedule

Following receipt of the final volume of waste in the Mixing Tanks, VLS will initiate closure of the tanks and their associated ancillary equipment. The time for closure of the Solidification/Mixing Tanks is estimated to be approximately 180 days and is based on the following activities:

- Removal of waste from tank and associated ancillary equipment.
- Flushing with suitable solvent, removal of waste/solvent mixture, and subsequent treatment/disposal;
- Final rinse of tank/ancillary equipment and collection of samples for demonstration of decontamination; and
- Verification decontamination and complete closure activities.

The proposed schedule for closure of a Mixing Tank is:

Activity	Timing
TCEQ Notification of Closure (if required by permit)	≥30 Days Prior to Final Volume of Waste to Unit
Final volume of waste to unit	Day 0
Removal of waste from tank and ancillary equipment	By Day 90
Flushing of tank/ancillary equipment and removal and treatment/disposal of waste/water mixture	
Final rinse of tank/ancillary equipment and collection of samples for demonstration of decontamination	By Day 180
Verification of decontamination	
Completion of closure activities	

ATTACHMENT VII.A.4

VLS Statement of Financial Mechanism for Closure

October 16, 2025

Mr. Martin Torres
Manager, Industrial and Hazardous Waste Permits Section
Texas Commission on Environmental Quality
Building F, MC 130
12100 Park 35 Circle
Austin, Texas 78753

Re: Financial Disclosure Letter for *VLS Environmental Solutions, LLC*
Permit Application for New Industrial Nonhazardous Waste Storage and Processing Facility
Industrial Solid Waste Registration No. 98656
RN112239843; CN603340787

Dear Mr. Torres:

This letter is furnished to you to provide assurance that VLS Environmental Solutions, LLC has sufficient resources to comply with financial assurance requirements as applicable under Title 30, Texas Administrative Code (30 TAC), Section 335.7.

In keeping with financial assurance requirements, I hereby certify that VLS Environmental Solutions, LLC is adequately capitalized and has sufficient financial resources to close, provide post-closure care for and perform corrective action for the above-referenced facility in a safe manner, and in compliance with the permit and all applicable rules.

VLS Environmental Solutions, LLC will provide, as financial assurance mechanism as set out in 30 TAC, Chapter 37, Subchapter C to meet VLS Environmental Solutions, LLC's financial assurance obligations the following: **Performance Bond for Closure Obligations**.

I am authorized to make these statements on behalf of VLS Environmental Solutions, LLC. I understand that the TCEQ may request additional information as part of their review.

Sincerely,

Kris Terrill
Chief Financial Officer
VLS Environmental Solutions, LLC
(713) 936-0960 Ext 2112
[redacted]

Tracking No. 32553583

TCEQ Use Only
ISW PERMIT NO. 99200

TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission *(If other is checked please describe in space provided.)*

☒ New Permit, Registration or Authorization *(Core Data Form should be submitted with the program application.)*

☐ Renewal *(Core Data Form should be submitted with the renewal form)* ☐ Other

2. Customer Reference Number *(if issued)*	Follow this link to search for CN or RN numbers in Central Registry**	**3. Regulated Entity Reference Number** *(if issued)*
CN 603340787		**RN** RN112239843

SECTION II: Customer Information

4. General Customer Information	**5. Effective Date for Customer Information Updates** (mm/dd/yyyy)	5/30/2025

☐ New Customer ☒ Update to Customer Information ☐ Change in Regulated Entity Ownership
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)

The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).

6. Customer Legal Name *(If an individual, print last name first: eg: Doe, John)* *If new Customer, enter previous Customer below:*

VLS Environmental Solutions, LLC

7. TX SOS/CPA Filing Number	**8. TX State Tax ID** (11 digits)	**9. Federal Tax ID** (9 digits)	**10. DUNS Number** *(if applicable)*
800915411	12615737645	26-1573764	

11. Type of Customer: ☒ Corporation ☐ Individual Partnership: ☐ General ☐ Limited
Government: ☐ City ☐ County ☐ Federal ☐ Local ☐ State ☐ Other ☐ Sole Proprietorship ☐ Other:

12. Number of Employees
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☒ 501 and higher

13. Independently Owned and Operated?
☒ Yes ☐ No

14. Customer Role (Proposed or Actual) – *as it relates to the Regulated Entity listed on this form. Please check one of the following*

☐ Owner ☐ Operator ☒ Owner & Operator
☐ Occupational Licensee ☐ Responsible Party ☐ VCP/BSA Applicant ☐ Other:

15. Mailing Address:	19500 State Highway 249, Suite 440						
	City	Houston	**State**	TX	**ZIP**	77070	**ZIP + 4**	3022

16. Country Mailing Information *(if outside USA)*	**17. E-Mail Address** *(if applicable)*
	[redacted]

18. Telephone Number	19. Extension or Code	20. Fax Number *(if applicable)*
(713) 936-0960		( ) -

SECTION III: Regulated Entity Information

21. General Regulated Entity Information *(If 'New Regulated Entity" is selected, a new permit application is also required.)*

☒ New Regulated Entity ☐ Update to Regulated Entity Name ☐ Update to Regulated Entity Information

The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).

22. Regulated Entity Name *(Enter name of the site where the regulated action is taking place.)*

VLS New Braunfels, LLC

23. Street Address of the Regulated Entity: ***(No PO Boxes)***	5350 Buffalo Ranch Drive							
	City	New Braunfels	**State**	TX	**ZIP**	78132	**ZIP + 4**	
24. County	Comal							

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

25. Description to Physical Location:	On IH-35 from New Braunfels, take exit 183. Turn right onto N. Solms Rd. Go 0.2 mi. and then turn left on FM 482. In 0.2 mi. stay right on FM482 and continue 1 mi. Then turn right onto Krueger Canyon Road. In 0.2 miles turn left onto the easement to access the property that is west of Kruger Canyon Road and North of the Union Pacific Railroad.					
26. Nearest City				**State**		**Nearest ZIP Code**
New Braunfels				TX		78132

Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).

27. Latitude (N) In Decimal:	29.663785		**28. Longitude (W) In Decimal:**	-98.194596	
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
29	39	49.63	98	11	40.55

29. Primary SIC Code (4 digits)	**30. Secondary SIC Code** (4 digits)	**31. Primary NAICS Code** (5 or 6 digits)	**32. Secondary NAICS Code** (5 or 6 digits)
4953	5093	562219	N/A

33. What is the Primary Business of this entity? *(Do not repeat the SIC or NAICS description.)*

Stabilization of nonhaz industrial waste

34. Mailing Address:	**19500 State Highway 249, Suite 440**							
	City	**Houston**	**State**	**TX**	**ZIP**	**77070**	**ZIP + 4**	**3022**
35. E-Mail Address:	**bennett.sansbury@vlses.com**							
36. Telephone Number		**37. Extension or Code**		**38. Fax Number** *(if applicable)*				

(713) 936-0960		( ) -

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

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☐ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☐ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

SECTION IV: Preparer Information

40. Name:	Beth Gross	**41. Title:**	Senior Consultant/Principal

42. Telephone Number	**43. Ext./Code**	**44. Fax Number**	**45. E-Mail Address**
(512) 658-3944		( ) -	[redacted]

SECTION V: Authorized Signature

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

Company:	VLS Environmental Solutions, LLC	**Job Title:**	Chief Counsel and Head of Govt Affairs
Name *(In Print)*:	Brian Brantley	**Phone:**	(413) 404- **2899**
Signature:	[signature]	**Date:**	6/5/25