CORRESPONDENCE COVER SHEET
WASTE PERMITS DIVISION
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Date: August 6, 2025
Facility Name: Daniels Arlington Facility
Permit or Registration No.: MSW-40345

Nature of Correspondence:
☐ Initial/New
☒ Response/Revision*

*If Response/Revision, please provide previous TCEQ Tracking No.: 31578569
(Previous TCEQ Tracking No. can be found in the Subject line of the TCEQ's response letter to your original submittal.)

This cover sheet should accompany all correspondences submitted to the Waste Permits Division and should be affixed to the front of your submittal as a cover page. Please check the appropriate box for the type of correspondence being submitted. For questions regarding this form, please contact the Waste Permits Division at (512) 239-2335.

Table 1 - Municipal Solid Waste

APPLICATIONS	REPORTS and RESPONSES
☐ New Notification	☐ Closure Report
☐ New Permit (including Subchapter T)	☐ Groundwater Alternate SRC Demonstration
☐ New Registration (including Subchapter T)	☐ Groundwater Corrective Action
☐ Major Amendment	☐ Groundwater Monitoring Report
☐ Minor Amendment	☐ Groundwater Statistical Evaluation
☐ Limited Scope Major Amendment	☐ Landfill Gas Corrective Action
☐ Notice Modification	☐ Landfill Gas Monitoring
☐ Non-Notice Modification	☐ Liner Evaluation Report
☐ Transfer/Name Change Modification	☐ Soil Boring Plan
☐ Temporary Authorization	☐ Special Waste Request
☐ Voluntary Revocation	☐ Other:
☐ Subchapter T Workplan	
☒ Other: N**OD Response**	

Table 2 - Industrial & Hazardous Waste

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

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August 6, 2025

Ms. Madison Howard, Project Manager
Municipal Solid Waste Permits Section (MC-124)
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

RE: Response to Notice of Deficiency
Application for Medical Waste Registration
Daniels Arlington Facility
Municipal Solid Waste – Registration No. 40345
Response to Notice of Deficiency (NOD)
Tracking No. 31578569; RN112211545/CN603401506

Dear Ms. Howard:

This letter is provided on behalf of Daniels Sharpsmart, Inc. in response to TCEQ's June 13, 2025 Notice of Deficiency email for the above-mentioned registration application. The attached Table of deficiencies details the TCEQ's NOD descriptions and the applicant's response to each NOD item.

The following replacement pages are included with this response:

- Binder Cover
- Application Form TCEQ-20789, cover page, table of contents, pages 9-13, 15, 16, 19-21 and 23 (applicant's certification)
- Attachment 2, Facility Access and Layout Map, Figures 1 and 2
- Attachment 6, pages 1 and 2
- Attachment 9 (add pages)
- Attachment 14, Manufacturer's Specifications (add pages)
- Attachment 15, pages 3 and 4

An original plus one copy of the revised pages is included with this submittal. One redline/strikeout copy is included. A copy of this submittal will be provided to the TCEQ Region 4 office. If you have any questions or comments, please contact me at (361) 883-1984 or [redacted]

Sincerely,

Amy R. Hesseltine, P.E.
Environmental Group Leader

cc: Kyle Little, Director of Compliance, Daniels Sharpsmart, Inc.
Erin Gorman, Waste Section Manager, TCEQ Region 4

Table of Deficiencies

NOD ID	Citation	Location	NOD Type	NOD Description	Applicant Response
1	326.71(a)(5)(C)	Section 2.1	Inconsistent	Clarify whether the distance to the nearest commercial facility is 0.01 miles or 0.1 miles.	The correct distance is 0.01 miles. Section 2.1 on page 9 of application form TCEQ-20489 was revised to correct the typographical error.
2	326.71(e)	Section 2.2, Table 2	Incorrect	For existing traffic please use the most recent year of data.	The Existing Vehicle Traffic Volume, Table 2 on page 10 of application form TCEQ-20789 was updated to the most recent year of data (2023).
3	326.71(h)(3)	Section 2.4	Incorrect	Demonstrate that a 25-foot buffer zone is not feasible and that the proposed buffer zone affords ready access for emergency response and maintenance. The buffer zone must not be narrower than necessary to provide safe passage for firefighting and other emergency vehicles.	A 25 ft buffer is not feasible because of location of existing infrastructure (building and covered platform) in relation to property boundary. The proposed alternative buffers coincide with the distances between the registration boundary/property lines and the existing infrastructure. Since the alternative buffers coincide with exiting structures, the alterative buffers do not impose additional limitiations to access. The alternative buffer zone affords ready access for emergency and response vehicles. Section 2.4 on page 11 of application form TCEQ-20789 was updated to include this text.
4	326.71(i)(4)	Section 2.5, Contaminated Water Management	Inconsistent	Describe how an open top container will prevent waste from exposure to animals, rain, water, and wind.	Reference to open top container has been removed from the application. Treated waste will be stored in compactor, enclosed trailer, or covered container. Section 2.5 was updated to include the option of a stationary compactor and to add a walking floor trailer. Specifications for the walking floor trailer were added to Attachment 14.
5	326.71(m)	Section 3.2	Ambiguous	Specify that the total cost is in U.S. dollars.	A note was added to Section 3.2 on page 15 of application form TCEQ-20789 to state that *Cost are in US dollars* . Also $ was added to each line item cost.
6	326.75(b)	Section 4.2	Incomplete	a. Specify that any materials mixed or contacting medical waste shall be managed as medical waste. b. Explain how the facility will limit the maximum storage of waste to 50 tons per day when the maximum amount of waste to be received daily is 50 tons per day and the autoclave can only process 2 tons per cycle. c. Specify the intended destination of solid waste.	a. Section 4.2 (page 19 of application form TCEQ-20789) was revised to specify that any materials mixed with or contacting medical waste shall be managed as medical waste. b. The approximate process rate was corrected to 2.5 tons/cycle. At a processng rate of 2.5 tons per cycle and 24 cycles per day (8 cycles in 1st shift, 8 cycles in 2nd shift, and 8 cycles in 3rd shift), the autoclave can process 60 tons/day. The facility will not store more than 50 tons at any given point in time. c. The intended destination of solid waste including treated medical waste is a TCEQ approved municipal solid waste landfill. This is specified in Sections 4.2 and 4.3 of application form TCEQ-20789 and in Attachment 6.
7	326.75(g)	Section 4.4	Ambiguous	Clarify whether a four-foot-high barbed wire fence will be used around the entire property.	Access to the facility will be controlled by a six foot chainlink fence topped with barbed wire and building walls. Section 4.4 of application form TCEQ-20789 was updated to convey this information.
8	326.75(i)	Section 4.5	Incomplete	Provide justification for the proposed operating hours of 24 hours 7 days a week.	The Daniels Arlington Facility may operate up to 24 hours a day 7 days a week. The ability to operate is critical for maintaining public health, environmental safety, and regulatory compliance. It ensures medical waste is promptly and properly managed, reducing health risks and supporting the uninterrupted and continuous generation of regulated medical waste. Therefor Daniels is requesting to operate up to 24 hours a day 7 days a week for the following reasons: 1. The continuous generation of regulated medical waste – medical waste is continuously generated and with 24/7 service / processing ability it helps manage storage volumes, contamination risks, and potential non-compliances. 2. Regulatory Compliance and Safety – Continuous processing minimize storage time and helps reduce odors, pests, and potential exposures. 3.Volume Mgt and Emergency Response – During pandemics or outbreaks the volume of medical waste can dramatically fluctuate. A 24/7 facility is better equipped to scale operates rapidly, manage fluctuations and ensure no backlog compromises compliance, safety, or customer service. 4. Operational Efficiency – Spreading process across 24 hours allow for better use of equipment and personnel, reducing peak load stress. This information has been added to Section 4.5 of application form TCEQ-20789.

Table of Deficiencies					
NOD ID	**Citation**	**Location**	**NOD Type**	**NOD Description**	**Applicant Response**
9	326.71(a)(2)	Attachment 2, Figures 1 and 2	Incomplete	a. Show all public access roads serving the facility and all site entrance roads from the public access roads. b. Depict the locations of the facility interior roadways. c. The line used for the fencing is not visible. d. Show the location of the recyclables storage and processing areas.	a. Public access roads are shown on General Location Map (Attachment 1). Site entrances from public access roads are shown on Attachment 1 Figures 1 and 2. b. The facility does not have interior "roadways". Paved areas for truck parking, loading and unloading is shown on Attachment 2, Figures 1 and 2. c. The line type used for the fence was thickened/darkened to make improve visibility of the line. d. Attachment 2, Figures 1 and 2 have been updated to show the location of recyclables storage and processing areas.
10	326.71(e)	Attachment 9	Incomplete	Provide a response letter from TxDOT.	A response letter from TxDOT has not been received. A coordination letter dated December 19, 2024was initially sent to TxDOT's Fort Worth District Engineer. A second coordination letter dated June 19, 2025 was sent to TxDOT's Fort Worth District Engineer and a copy sent to Fort Worth Area Engineer and Euless Area Engineer. A copy of the December 19, 2024 letter was included in the initial application submittal. A copy of the June 19, 2025 letter is included with this response to NOD submittal.
11	326.71(a)(4)		Omitted	Provide a published zoning map.	A published zoning map for the City of Arlington was not found. The City of Arlington has an online GIS map for zoning (and other information). The online GIS map (https://gis.arlingtontx.gov/mapsonline/) is the source used to create the Land Use Map provided as Attachment 3 of the application. The land uses correspond with the zoning. The subtitle *Land Use/Zoning* was added to the legend of Attachment 3.
12		Attachment 6	Incorrect	Revise the typo of “medial waste” to say “medical waste.”	Page 1 of Attachment 4 was revised to correct the typo.
13	326.75(g)	Attachment 15	Ambigouos	a. Access Roads: Clarify whether the access roads are at least two lanes. b. Perimeter Fencing: Define the height of the wooden fence or otherwise explain how it is equivalent to a four-foot barbed wire fence or a six-foot chain link fence. Also, describe the fencing used on the eastern portion of the property boundary.	a. 110th Street is a two lane asphalt paved road. East Randol Mill Road is a six lane divided (3 lanes each direction) concrete paved road. This was added to the Facility Layout Maps in Attachment 2. b. Perimeter Fencing: A wooden fence will not be used at the facility. References to wooden fence have been removed from the application. There is a small section of chainlink fence on the eastern portion of the property boundary from the NE corner of the building to the NE corner of the property. Otherwise, access along the eastern property boundary is provided by the building walls.
14	326.71(f)		Omitted	Address 326.71(f)(2)-(4).	Section 2.3 of application form TCEQ-20789 was updated to address 326.71(f)(2)-(4).
15	326.71(i)	Section 2.5, Attachment 14	Incomplete	Provide manufacturer specifications for the autoclave and boiler.	Manufacturer specifications for autoclave and boiler are provided in Attachment 14 of the application. The specifications provided are consistent with information provided in previous applications for other medical waste treatment facilities. A brochure from the manufacturer is included with this submittal.

Texas Commission on Environmental Quality

Application for a Medical Waste Registration

Daniels Arlington Facility

Registration 40345

Arlington, Tarrant County, Texas

April 2025

Technical Review 1: July 2025

Prepared for

Daniels Sharpsmart, Inc.

111 W. Jackson Blvd, Suite 1900

Chicago, IL 60604

Prepared by

Amy Hesseltine, PE

Ardurra Group, Inc.

TBPE Firm Registration Number 10053

801 Navigation Blvd, Suite 300

Corpus Christi, Texas 78408

7/31/25
Amy Hesseltine
FOR PERMITTING PURPOSES

Table of Contents

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Amy R Hesseltine
FOR PERMITTING PURPOSES

Section 2—Facility Design Information

2.1 Impact on Surrounding Area [30 TAC §326.71(a)(5)(A) & (B)]

This section addresses the facility's impacts on cities, communities, groups of property owners, or individuals (attach additional pages to answer the following questions, if necessary):

Describe the character of the surrounding area land uses within one mile of the facility:

The area surrounding the facility is predominately industrial. A residential subdivision is located approximately 0.61 miles east of the facility.

Identify growth trends within five miles of the facility with directions of major development:

The area within 5 miles of the facility is has been developed for over a decade. There is limited undeveloped tracts within 5 miles for development

Indicate the approximate number of residences and other uses (e.g. schools, churches, cemeteries, historic structures and commercial sites, etc.) within one mile of the facility:

Within approximately 1 mile of the facility are an estimated 450 residences, 150 commerical site, 2 churches, and 1 cemetary. No public schools or historic structures were found within 1 mile of the facility.

Indicate the distance to the nearest residence(s): 0.61 ☐ feet ☒ miles

Provide directions to the nearest residence(s):

0.61 miles east of the facility

Indicate the distance to the nearest commercial establishment(s): 0.01 ☐ feet ☒ miles

Provide directions to the nearest commercial establishment(s):

0.01 miles west

2.2 Transportation [30 TAC §326.71(e)]

Access Roads

Complete Table 1 regarding the roads that will be used to access the site.

Table 1. Roads That Will be Used to Access the Site.

Name of Road	Surface Type and Number of Lanes
E. Randol Mill Rd	Concrete, 6-lane divided (3 each direction)

Name of Road	Surface Type and Number of Lanes
State Highway 360	Asphalt, 6-lane divided (3 each direction)
State Highway 161	Concrete, 8-lane divided (4 each direction)

Daily Traffic Volume

Complete Table 2 regarding existing and expected volume of vehicular traffic on access roads within one mile of the facility, and the projected volume of traffic expected to be generated by the facility on access roads within one mile of the facility.

Table 2. Traffic Volume.

Vehicle Traffic	Volume (vehicles per day)
Existing Vehicle Traffic	6011 (2023)
Expected Vehicle Traffic	7787 (2042)
Projected Vehicle Traffic Generated by Facility	30

Describe the source of or method used to obtain the volumes (attach additional pages to answer this question if necessary):

Existing (2023) average annual daily traffic (AADT) was obtained from Alamo Area MPO (https://geoportal-mpo.opendata.arcgis.com/datasets/TXDOT::txdot-annual-daily-traffic-counts-public/explore) and future/expected (2042) AADT was obtained from TxDOT Statewide Planning Map (txdot.gov/apps/statewide_mapping/statewideplanningmap.html)

If traffic volume was determined by counts in the field, indicate the locations where the counts were conducted (attach additional pages to answer this question if necessary):

N/A

2.3 Floodplain and Wetlands [30 TAC §326.71(f)]

Will the facility be located within a 100-year floodplain?

Yes ☐ No ☒ Identify the floodplain zone Zone X, See Attachment 10 for FEMA Map (Map Number 48439C0360L effective 3/21/2019). Zone X is not in the 100-year floodplain. Therefore, additional documentation is not required to demonstrate that the facility is designed and will be operated in a manner to prevent washout of waste during a 100-year storm event. The facility will be constructed, maintained, and operated to manage run-on and run-off during the peak discharge of a 25-yr rainfall event and will prevent the off-site discharge of waste. Surface water drainage in and around the facility will be

controlled to minimize surface water running onto, into, and off the storage, transfer, and waste processing areas. Waste processing will occur inside the building which is covered and elevated above natural ground and surface water drainage. Waste transfer will occur at the covered loading docks or from vehicle to vehicle. Both waste transfer methods keep the waste in areas elevated above natural ground and surface water drainage. Waste will be stored inside the building, in closed transport vehicles or in covered waste containers.

The facility will obtain the appropriate Texas Pollutant Discharge Elimination System (TPDES) storm water permit coverage when required.

Attach a copy of the Federal Emergency Management Administration administrator (FEMA) flood map for the area.

If the facility will be within a 100-year floodplain, attach documentation demonstrating that the facility is designed and will be operated in a manner to prevent washout of waste during a 100-year storm event, or that the facility has obtained a conditional letter of map amendment from the FEMA.

Will the facility be located in wetlands?

Yes ☐ No ☒

If yes, attach documentation to the extent required under Clean Water Act, §404 or applicable state wetlands laws.

2.4 Buffer Zones and Easement Protection [30 TAC §326.71(h)(3)]

Is the buffer zone in any location at the facility less than 25 feet wide?

Yes ☒ No ☐

If yes, describe your alternative buffer zone and how it will allow access for emergency response and maintenance (attach additional pages to answer this question if necessary):

A 25 ft buffer is not feasible because of location of existing building and covered platform with docks in relation to property boundary. Waste processing will be conducted inside of the enclosed waste processing building. The waste processing building is on the eastern property line/registration boundary, approximately 15 ft from the western property line, and approximately 20 ft from the northern property line/registration boundary. The covered docks are approximately 11 ft from the southern property boundary/registration boundary. The proposed alternative buffers coincide with the distance between the registration boundary and the existing structures. Refer to Facility Location Map in Attachment 2 for locations and distances of alternative buffers. Access to the facility is from the south and west sides where 25 ft buffer will be maintained. Since the alternative buffers coincide with exiting structures, the alterative buffers do not impose additional limitiations to access. The alternative buffer zone affords ready access for emergency and response vehicles. No solid waste loading/unloading, transfer, storage, or processing will occur within the buffer zone or any easement crossing the registration boundary. Temporary waste storage in locked, refrigerated transport vehciles parked in the buffer zone, however is allowed.

2.5 Waste Management Unit Designs [30 TAC §326.71(i)]

Waste Management Unit Details

List each waste management unit in Table 3. Include attachments documenting manufacturer specifications.

Table 3. Design Details and Manufacturer Specifications for Waste Management Units.

Unit Type	Minimum Number of Units	Design Details	Approximate Dimensions	Approximate Capacity per Unit
Autoclave	1	See Attachment 14	6 ft by 34 ft	5000 lb/cycle
Boiler	1	See Attachment 14	Length: 13.5 ft Width: 6.5 ft Height: 7 ft	6,696,000 btu/hr
Cart Tipper	1	Typical Hydraulic Cart Lift/Tip	Length: 36" Width: 58" Height: 72"	300 lbs / tip
Tunnel Washer	1	See Attachment 14	Length: 32 ft Width: 7 ft Height: 7 ft	20,000 units/week
WashSmart	1	See Attachment 14	Length: 36 ft Width: 19.5 ft	30,000 units/week
Refrigerated Tractor Trailer (or equivalent)	1	Typical standard freight trailer (or equivalent)	Length: 24, 48, or 53 ft Width: Typical Height: Typical	18 tons
Compactor	1	Typical self contained compactor or Typical staionary compactor and container	Length: 22.5 ft Width: 8.25 ft Height: 8.5 ft	34 cubic yards

Unit Type	Minimum Number of Units	Design Details	Approximate Dimensions	Approximate Capacity per Unit
Walking Floor Trailer/Unloading Trailer	1	See Attachment 14	Length: 50 ft Width: 8 ft Height: 8.5 ft	113 cubic yards

Foundations and Supports

Provide a generalized description of construction materials for slab and subsurface supports of all storage and processing components (attach additional pages to answer this question if necessary):

Medical waste processing and storage will be conducted inside the existing building supported on the concrete foundation capable of supporting the waste processing equipment. Waste processing equipment will be installed on the existing concrete foundation. No additional foundation reinforcement will be required to support the equipment.

Contaminated Water Management

Describe how storage and processing areas will be designed to control and contain spills and prevent contaminated water from leaving the facility. For unenclosed containment areas, also account for precipitation from a 25-year, 24-hour storm (attach additional pages to answer this question if necessary):

Waste processing units will be located in the enclosed waste processing building which is capable of controlling and containing worst case spills or releases and contaminated water from leaving the facility. Untreated waste will be stored inside the enclosed waste processing building or inside fully enclosed transportation unit(s). Liquids generated during waste processing, container washing, and routine cleaning will be controlled and contained to prevent spills and to prevent contaminated water from leaving the facility. Liquids generated from waste processing is steam condensate which will be discharged to the sanitary sewer system. Water generated from container washing units will be reused in the units or discharged to the sanitary sewer.

Any spills will be immediately contained, collected, and placed into the processing unit or discharged to the sanitary sewer via sink and floor drains in the processing building. Tools that may be used to contain and collect spills include absorbant materials, mop, bucket and/or broom. Any free liquids received at the facility shall be packaged with sufficient sorbent material to absorb 100% of the free liquids within the package in accordance with 49 CFR 173.197(c)(2). Therefore, free liquids should not be generated during potential spills.

Treated waste will be stored in covered compactor, enclosed trailer and/or covered container. Since waste is under cover, contaminated water resulting from precipitation in

contact with untreated medical waste will not be generated. Storage of medical waste will be in a secure manner and location that affords protection from theft, vandalism, inadvertent human or animal exposure, rain, water, and wind. The waste will be managed so as not to provide a breeding place or food for inspects or rodents, and not generate noxious odors.

2.6 Treatment Requirements [30 TAC §326.71(j)]

Attach a written procedure for the operation and testing of any equipment used, and for the preparation of any chemicals used in treatment.

3.2 Closure Cost Estimate [30 TAC §326.71(m)]

Provide itemized closure cost estimates in Table 4. The cost estimates must meet the requirements listed in 30 TAC §326.71(m). **Cost are in US dollars.**

Attach documents detailing any additional unit closure costs not itemized. Enter the total of those additional unit closure costs on line 13 of the closure cost worksheet in Table 4.

Table 4. Closure Cost Estimates Worksheet.

Item No.	Item Description	Unit of Measure-ment	Quantity	Unit Cost	Total Cost
1	Site Evaluation and Engineering Review	NA	1	$5000	$5000
2	Bid Document and Procurement	NA	1	$3000	$3000
3	Contract Award and Administration	NA	1	$3000	$3000
4	Clean-Up, Removal and Transport of Waste Stored On-Site	NA	1	$9000	$9000
5	Disposal of Waste at an Authorized Facility	TONS	50	$45	$2250
6	Waste Treatment	TONS	50	$360	$18000
7	Process Units Dismantling	NA	1	$2500	$2500
8	Wash Down and Disinfection of Facility and Processing Units	NA	1	$2500	$2500
9	Vector Control	NA	1	$300	$300
10	Site Security	NA	1	$300	$300
11	Signs, Newspaper Notice and TCEQ Notice	NA	1	$2000	$2000
12	Facility Inspection and Closure Certification by Licensed Engineer	NA	1	$5000	$5000
13	Additional Storage and Processing Unit Closure Cost Items (describe in attachments)	Identify Attachments	NA	NA	0

Item No.	Item Description	Unit of Measure-ment	Quantity	Unit Cost	Total Cost
14	Storage and Processing Unit Closure Costs Subtotal	NA	NA	NA	$52850
15	Contingency Cost 10%	NA	NA	NA	$5285
16	Total Closure Cost Estimate	NA	NA	NA	$58,135

7/31/25

Amy R Hesseltine

FOR PERMITTING PURPOSES

Section prior to temporary storage of hazardous waste in transit. Regulated medical waste will not be stored in the designated 10-day hazardous waste storage area.

There are no waste constituents or characteristics that could be a limiting parameter that may impact or influence the design and operation of the facility.

Describe the sources and characteristics of recyclable materials, if applicable, to be received for storage and processing (attach additional pages to answer this question if necessary):

Acceptable source separated recyclables include confidential documents and cardboard. These waste streams will be received from off-site sources such as hospitals, clinics, nursing homes, and other health care related facilities. Confidential documents may be shredded and recycled. Cardboard boxes may be baled and recycled. Reusable plastic containers may be washed and returned to customers for reuse.

Maximum amount of waste to be received daily: 50 ☐ pounds/day ☒ tons /day

Maximum amount of waste to be stored at any point in time: 50 ☐ pounds ☒ tons

Maximum length of time waste is to remain at the facility: 30 ☐ hours ☒ days

Specify the maximum time that unprocessed and processed wastes will be allowed to remain on-site:

Processed: 10 ☐ hours ☒ days

Unprocessed: 30 ☐ hours ☒ days

Identify the intended disposition of processed and unprocessed waste received at the facility (attach additional pages to answer this question if necessary):

Untreated medical waste will be managed in accordance with 25 TAC Subchapter K and 30 TAC Chapter 326. Materials mixed with or in contact with medical waste will be managed as medical waste. Untreated medical waste may be temporarily stored at the facility unrefrigerated for up to 72 hours after receipt at the facility. Untreated medical waste held longer than 72 hours after receipt at the facility will be stored at a temperature of 45 degrees Fahrenheit or less. Once treated in the autoclave unit(s), the steam sterilized waste will be placed in covered compactor, enclosed trailer, and/or covered container for temporary storage prior to transport and disposal at an approved landfill in accordance with 25 TAC §1.136 and 30 TAC §326.75(r). In the event the waste generator specifically requests a waste to be incinerated, the facility will accept, segregate for temporary storage, and transfer the waste off-site to an appropriately permitted facility.

The facility will also accept hazardous wastes in transit for temporary storage (less than or equal to 10 days).

4.3 Generated Waste [30 TAC §326.75(c)]

Describe how all liquids and solid waste resulting from the facility operations will be disposed of in a manner that will not cause surface water and groundwater pollution (attach additional pages to answer this question if necessary):

All liquids resulting from the facility operations will be generated inside the waste processing building with impervious concrete flooring and will be disposed of in a manner that will not cause surface water or groundwater pollution. Liquids generated during waste processing, washing, and routine cleaning will be controlled, collected, and either placed into the treatment unit or discharged to the sanitary sewer. Condensate from the autoclave system will also be discharged to the sanitary sewer system. Liquids generated at the facility can be properly managed without collection units (i.e. storage tanks and/or lined units). All necessary authorizations and approvals will be obtained and retained within the operating record at the site.

Solid wastes including treated medical waste generated by the facility are characterized as municipal solid waste. Municipal solid wastes generated by the facility can be adequately managed by MSW landfills permitted by the TCEQ. Treated waste will be stored in a covered compactor, enclosed trailer and/or covered container for temporary storage prior to transport to the landfill for disposal. Since waste will be stored under cover, contaminated water resulting from contact with untreated medical waste is not anticipated.

4.4 Access Control [30 TAC §326.75(g)]

Describe how public access to the facility will be controlled (attach additional pages to answer this question if necessary):

Public access to the facility will be controlled by artificial barriers. Fencing, locked gates, and buildings are used to control access to the facility. Access along the northern and western boundaries are controlled with a chainlink fence with barbed wire. The entrance to the facility along 110th Street (western boundary) is a locked sliding gate/swing gate combination. Access along the eastern boundary is provided by the building walls and a small section of chainlink fencing with barbed wire from the building to the fence on the northern boundary. The southern boundary of the facility that is shared with the adjoining property to the southwest, has a chainlink fence to control access. There is a steel gate between the facility and the adjoining property to the southwest. Building walls and lockable doors control access to the waste processing building where waste processing and storage occurs. Untreated waste may also be stored in enclosed, lockable transport vehicles. Transport vehicles and compactor/roll-off units storing treated waste are surrounded by fencing. The figures in Attachment 2 call out the fencing, entrance gate, and buildings referenced in this section.

Describe how access roads and parking areas will be maintained to control dust and prevent mud from being track off-site (attach additional pages to answer this question if necessary):

Dust and mud are not anticipated due to the access roads and on-site parking areas being paved. Public roads used by transport vehicles to access the facility are paved. Access roads

and parking areas within the facility are also paved. In the event there is a problem related to windblown dust, water will be used to control windblown dust. Within the facility, a standard garden hose connected to an on-site water source may be sufficient to apply water.

Access to the facility will be controlled by a perimeter fence, with lockable gates. Identify or describe the type of fence that will be installed at the facility:

☐ A four-foot-high barbed wire fence;

☒ A six-foot-high chain-link fence; or

☒ Other: building walls

4.5 Operating Hours [(30 TAC §326.75(i)]

Provide the operating hours of the facility; ***include justification for hours outside of 7:00 a.m. to 7:00 p.m., Monday through Friday***:

Waste acceptance and transfer hours for commercial waste transportation companies are 24 hours per day, seven days per week. Operating hours for waste processing units is 24 hours per day, seven days per week. The facility may conduct operations for maintenance and housekeeping, as needed, 24 hours per day, seven days per week.

The Daniels Arlington Facility may operate up to 24 hours a day 7 days a week. The ability to operate is critical for maintaining public health, environmental safety, and regulatory compliance. It ensures medical waste is promptly and properly managed, reducing health risks and supporting the uninterrupted and continuous generation of regulated medical waste. Therefor Daniels is requesting to operate up to 24 hours a day 7 days a week for the following reasons:
1. The continuous generation of regulated medical waste – medical waste is continuously generated and with 24/7 service / processing ability it helps manage storage volumes, contamination risks, and potential non-compliances.
2. Regulatory Compliance and Safety – Continuous processing minimize storage time and helps reduce odors, pests, and potential exposures.
3.Volume Mgt and Emergency Response – During pandemics or outbreaks the volume of medical waste can dramatically fluctuate. A 24/7 facility is better equipped to scale operates rapidly, manage fluctuations and ensure no backlog compromises compliance, safety, or customer service.
4. Operational Efficiency – Spreading process across 24 hours allow for better use of equipment and personnel, reducing peak load stress.

List the alternative operating hours, if any, of up to five days in a calendar-year period:

The need for alterative operating hours for special occasions, special purpose events, holidays, or other special occurrences is not anticipated.

Section 6—Applicant Certification and Signature

The applicant is the person or entity who would be the owner of the facility and in whose name the registration would be issued. If the application is signed by an authorized representative for the applicant, the applicant must complete the delegation of signature authority.

Certification by Applicant or Authorized Signatory [30 TAC §305.44]

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

Name of applicant, or other person authorized to sign: Jennifer Vaisnoras

Title of person signing: Compliance Attorney

Signature: Jennifer Vaisnoras Date: 8/6/25

Notarization

SUBSCRIBED AND SWORN to before me by the said _____

On this 06 day of AUGUST, 2025.

My commission expires on the 17 day of JUNE, 2028.

Jacqueline Barragan

Notary Public in and for

Cook County, ~~Texas~~ Illinois

OFFICIAL SEAL
JACQUELINE BARRAGAN
Notary Public, State of Illinois
Commission No. 912078
My Commission Expires June 17, 2028

Applicant's Delegation of Signature Authority [30 TAC §305.43]

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

Name of applicant's representative: _____

Name of person who is the applicant, or officer or official representing corporation or public agency that is the applicant: _____

Signature: _____ Date: _____

Notarization

SUBSCRIBED AND SWORN to before me by the said _____

On this _____ day of _____, _____.

My commission expires on the _____ day of _____, _____.

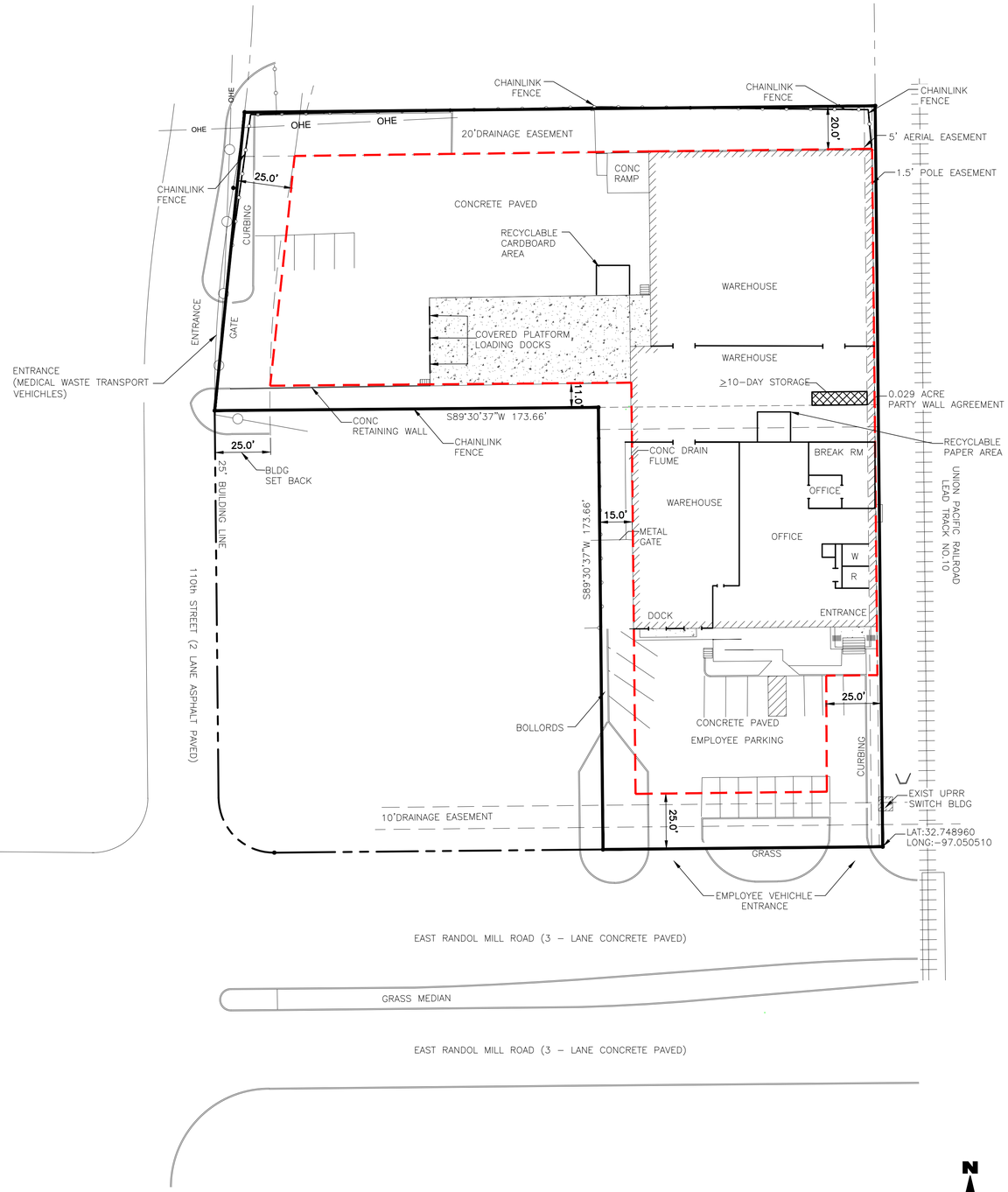
_____

Notary Public in and for

_____ County, Texas

ATTACHMENT 2

FACILTY ACCESS AND LAYOUT MAP



FACILITY LAYOUT MAP

- EXIST BUILDING
- REGISTRATION BOUNDARY
- PROPERTY LINE
- RAILROAD
- CHAIN LINK FENCE
- 1/2" REBAR
- POWER POLE
- OHE — OVERHEAD ELECTRICAL
- CONCRETE
- BUFFER ZONE
- ≥10 DAY HAZARDOUS WASTE STORAGE AREA

NOTES:

1. THE ≤ 10 HAZARDOUS WASTE AREA IS FOR TEMPORARY STORAGE OF HAZARDOUS WASTE IN TRANSIT.
2. FACILITY WILL INITIALLY OPERATE AS A TRANSFER AND STORAGE FACILITY. THIS FIGURE ILLUSTRATES THE FACILITY LAYOUT FOR WASTE TRANSFER AND STORAGE OPERATIONS.

N

1 — FACILITY LAYOUT MAP - WASTE TRANSFER

SCALE: HORIZ: 1"=60'
SCALE: HORIZ: 1"=30'

0 30' 60'

THE SEAL APPEARING ON THIS DOCUMENT WAS AUTHORIZED BY AMY REIN HESSELTINE, P.E. NO. 93578 ON 04-22-25. ALTERATION OF A SEALED DOCUMENT WITHOUT PROPER NOTIFICATION TO THE RESPONSIBLE ENGINEER IS AN OFFENSE UNDER THE TEXAS ENGINEERING PRACTICE ACT.

STATE OF TEXAS — AMY REIN HESSELTINE — 93578 — LICENSED PROFESSIONAL ENGINEER

07/31/25

801 Navigation Suite 300
Corpus Christi, Texas 78408
Phone: (361) 883-1984
www.Ardurra.com

Engineering License #F-10053
Ardurra Group, Inc.
Surveying Firm 10194688
Architectural Firm BR4160

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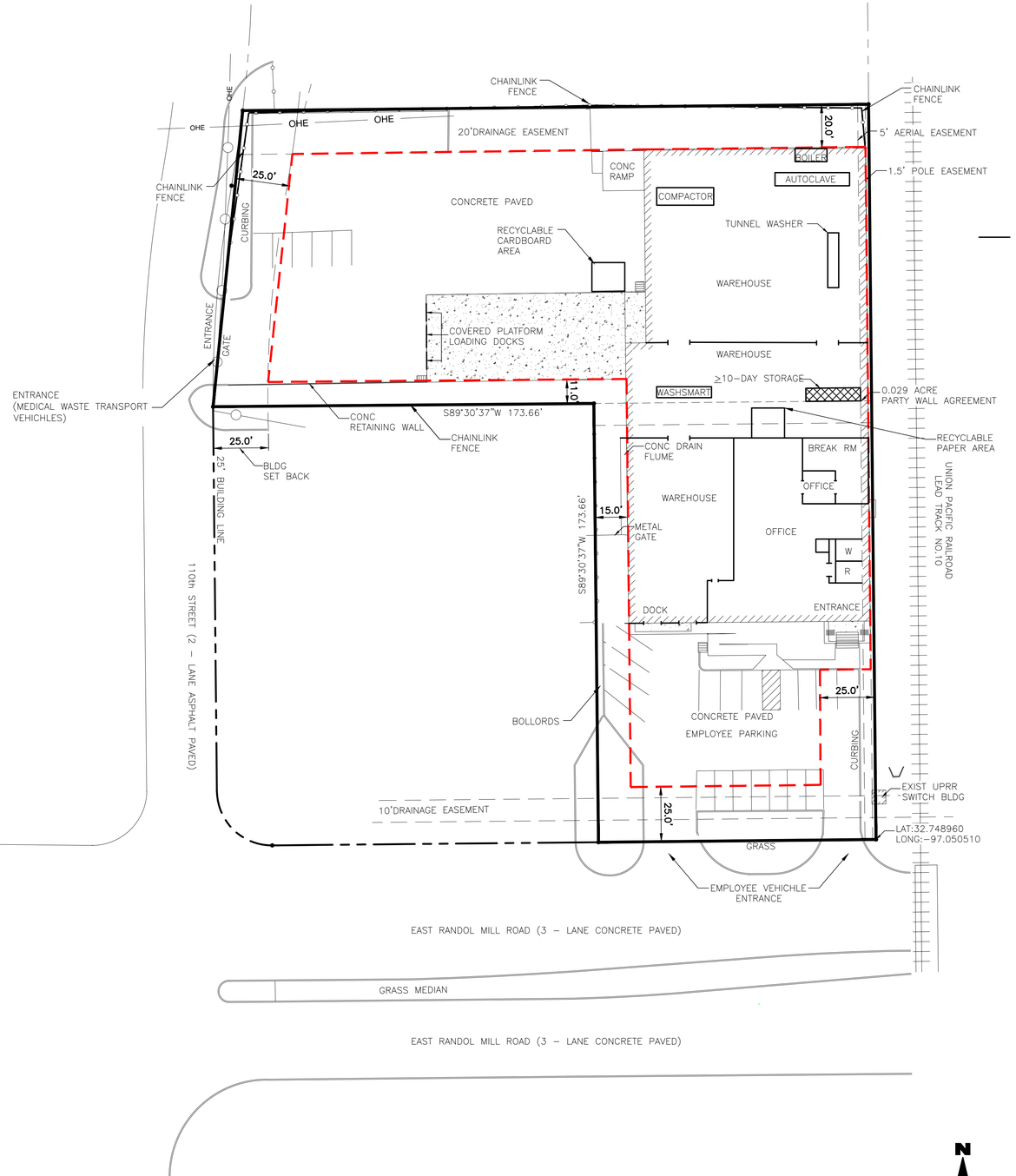
DANIELS ARLINGTON FACILITY
3221 E. RANDOL MILL RD.
ARLINGTON, TEXAS

FACILITY LAYOUT MAP - WASTE TRANSFER
ATTACHMENT2, FIGURE 1

DATE:	04/22/25
DRAWN BY:	TSH/AA
CHECKED BY:	AH
APPROVED BY:	AH
JOB NO:	2024-1853-00

REVISIONS		
7/25	1	ADD RECYCLE AREAS
DATE	NO.	DESCRIPTION

U:\Daniels Health\2024-1853-00 TCEQ Registration-Arlington\000\90-Survey\EXHIBIT- ATT 2 FIG 1.dwg
Friday August 01, 2025, 3:28pm



FACILITY LAYOUT MAP

- EXIST BUILDING
- REGISTRATION BOUNDARY
- PROPERTY LINE
- RAILROAD
- CHAIN LINK FENCE
- 1/2" REBAR
- POWER POLE
- OHE — OVERHEAD ELECTRICAL
- CONCRETE
- BUFFER ZONE
- ≥10 DAY HAZARDOUS WASTE STORAGE AREA

NOTES:

1. THE ≤ 10 HAZARDOUS WASTE AREA IS FOR TEMPORARY STORAGE OF HAZARDOUS WASTE IN TRANSIT.
2. FACILITY WILL INITIALLY OPERATE AS A TRANSFER AND STORAGE FACILITY, PRIOR TO INSTALLATION OF WASTE PROCESSING EQUIPMENT.
3. THIS FIGURE ILLUSTRATES FACILITY LAYOUT FOR WASTE PROCESSING.

N

1 -- FACILITY LAYOUT MAP - WASTE PROCESSING

SCALE: HORIZ: 1"=60'
SCALE: HORIZ: 1"=30'

0 30' 60'

THE SEAL APPEARING ON THIS DOCUMENT WAS AUTHORIZED BY AMY REIN HESSELTINE, P.E. NO. 93578 ON 04-22-25. ALTERATION OF A SEALED DOCUMENT WITHOUT PROPER NOTIFICATION TO THE RESPONSIBLE ENGINEER IS AN OFFENSE UNDER THE TEXAS ENGINEERING PRACTICE ACT.

STATE OF TEXAS
AMY REIN HESSELTINE
93578
LICENSED PROFESSIONAL ENGINEER

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DANIELS ARLINGTON FACILITY
3221 E. RANDOL MILL RD.
ARLINGTON, TEXAS

FACILITY LAYOUT MAP - WASTE PROCESSING ATTACHMENT2, FIGURE 2

DATE:	04/22/25
DRAWN BY:	TSH/AA
CHECKED BY:	AH
APPROVED BY:	AH
JOB NO:	2024-1853-00

REVISIONS

DATE	NO.	DESCRIPTION
7/25	1	ADD RECYCLE AREAS

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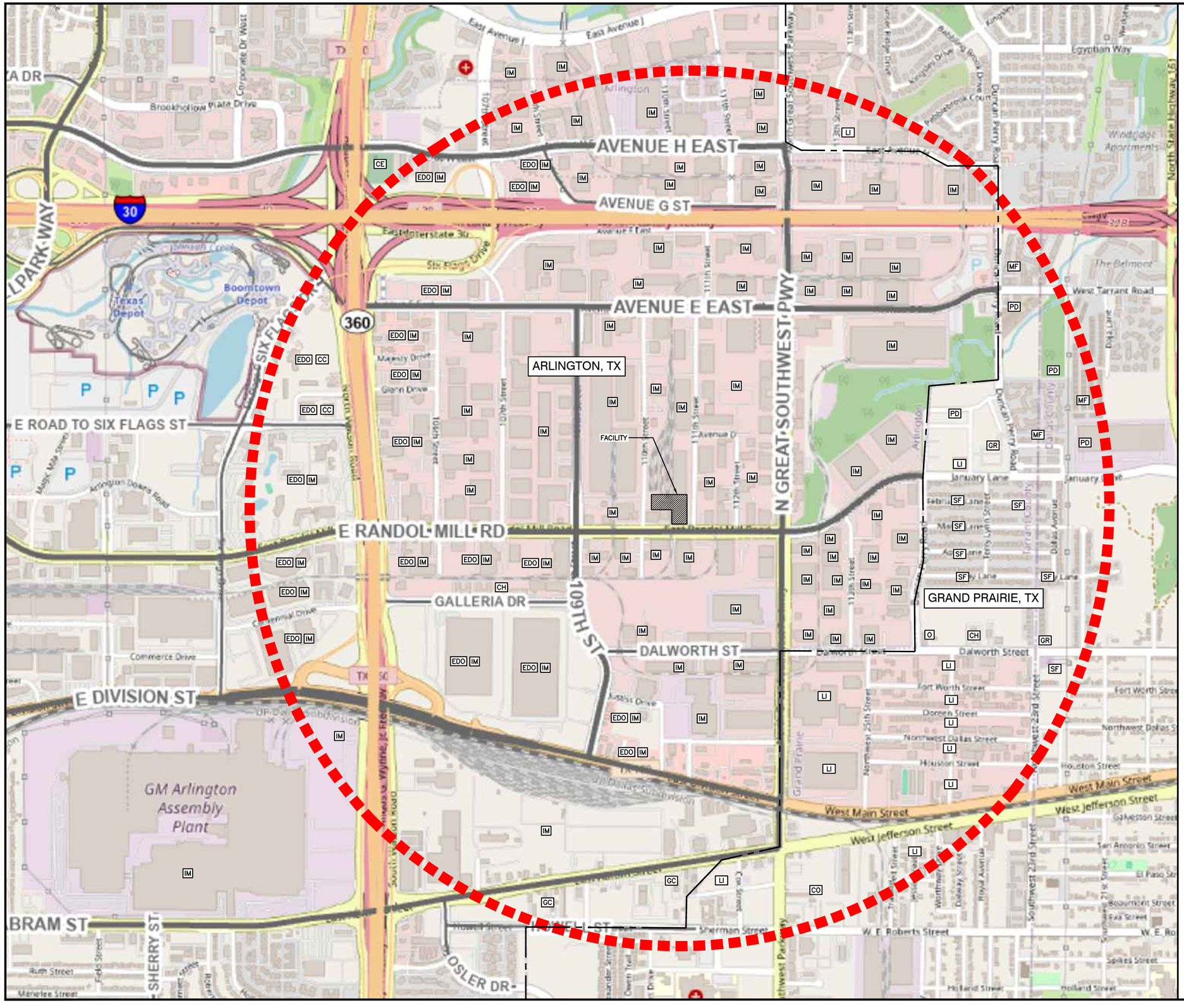
Friday August 01, 2025, 3:26pm

ATTACHMENT 3

LAND USE MAP



LEGEND:

- 1 MILE RADIUS FROM FACILITY/ REGISTRATION BOUNDARY
- CITY LIMITS

LAND USE/ZONING:

- FACILITY/REGISTRATION BOUNDARY
- IM
- O = INDUSTRIAL MANUFACTURING
- LI = OFFICE
- GC = LIGHT INDUSTRIAL
- CC = GENERAL COMMERCIAL
- P = COMMUNITY COMMERCIAL
- CH = PARK
- PD = CHURCH
- CE = PLANNED DEVELOPMENT
- EDO = CEMETARY
- GR = ENTERTAINMENT DISTRICT OVERLAY
- CO = GENERAL RETAIL
- SF = COMMERCIAL OFFICE
- MF = SINGLE FAMILY
- = MULTI FAMILY

NOTES:

1. MAP DERIVED FROM CITY OF ARLINGTON MAPS ONLINE AT: https://gis.arlingtontx.gov/mapsonline/?data_id=widget_65_output_config_1%3A0 AND CITY OF GRAND PRAIRIE INTERACTIVE MAP ONLINE AT https://gis.gptx.org/maps/.

N

LAND USE MAP
SCALE: 1"=600'
0 600' 1,200'

THIS DOCUMENT IS FOR INTERIM REVIEW AND IS NOT INTENDED FOR CONSTRUCTION, BIDDING, PERMIT AND/OR GOVERNMENTAL PURPOSES. THESE DOCUMENTS/PLANS WERE AUTHORIZED TO BE RELEASED.

BY: AMY R. HESSELTINE P.E.
LICENSE NO.: 93578 DATE: 01/31/2025

801 Navigation Suite 300
Corpus Christi, Texas 78408
Phone: (361) 883-1984
www.Ardurra.com

Engineering License #F-10053
Ardurra Group, Inc.
Surveying Firm 10194688
Architectural Firm BR4160

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DANIELS ARLINGTON FACILITY
3221 E. RANDOL MILL RD.
ARLINGTON, TEXAS

LAND USE MAP
ATTACHMENT 3

DATE:	04/22/25
DRAWN BY:	TSH/AA
CHECKED BY:	AH
APPROVED BY:	AH
JOB NO:	2024-1853-00

REVISIONS		
7/25	1	LEGEND
DATE	NO.	DESCRIPTION

U:\Daniels Health\2024-1853-00 TCEQ Registration-Arlington\000\20-Drawings\Exhibits-Imagery\2024-1853-00 - Exhibit Land Use Map - Att 3.dwg
Friday August 01, 2025, 3:30pm

ATTACHMENT 6

PROCESS FLOW DIAGRAM AND NARRATIVE

PROCESS FLOW DIAGRAM AND NARRATIVE

§326.71(h)(4) Flow Diagram and Narrative

A flow diagram indicating the receipt, storage, and transfer sequences for the various types of wastes received is provided in this Attachment 6 of the application. A narrative of each phase is provided below.

Arrival of Waste at Facility: Medical waste is delivered by a TCEQ registered medical waste transporter to the medical waste management facility. Only those waste streams specified in this registration application will be unloaded. The unloading of prohibited wastes will not be allowed.

Visual Inspection and Manifest Review: Incoming waste and accompanying manifests/shipping documents will be visually inspected by employees trained to identify prohibited waste. Random visual inspections of packaging for incoming waste containers will be conducted a minimum of once per week to verify proper markings have been placed on all containers of waste.

Waste Accepted: The facility will accept medical waste as defined in §326.3(23), non-hazardous pharmaceuticals, trace chemotherapeutic waste, and confidential documents. §326.3(23) defines medical waste as treated and untreated special waste from health care-related facilities that is comprised of animal waste, bulk blood, bulk human blood, bulk human body fluids, microbiological waste, pathological waste, and sharps as those terms are defined in 25 TAC §1.132 (relating to Definitions). Hazardous waste in transit will also be accepted for temporary (≤10 day) storage in a designated area.

Reject / Return to Transporter: Any prohibited waste discovered prior to unloading will be rejected and returned promptly to the transporter or generator of the waste. In the event unauthorized materials are unloaded at the site, the material will be rejected, and the transporter will be required to immediately remove the waste along with any contaminated materials from the facility. Any undisclosed prohibited waste discovered after unloading will be isolated until the material can be adequately identified.

Waste Transfer: Waste may be transferred to another appropriately permitted/registered facility for treatment. Transfer of waste will occur at the loading/unloading docks or from truck to truck. In the event the waste generator specifically requests a waste to be incinerated, the facility will accept, segregate for temporary storage, and transfer the waste off-site to an appropriately permitted facility.

Temporary Storage of Untreated Waste: Untreated medical waste may be temporarily stored at the site unrefrigerated for up to 72 hours. Putrescible or biohazardous untreated medical waste held longer than 72 hours after being received at the facility will be stored at a temperature of 45 degrees Fahrenheit or less. Stand-alone refrigeration units or transport trucks/trailers with refrigeration units will be used to store untreated medical waste held longer than 72 hours after receipt at the facility.

Transfer Waste to Autoclave Bin: A cart tipper or manual means will safely transfer untreated waste from containers into autoclave bins for processing.

Waste Processing by Autoclave: Waste received at the facility (expect non-hazardous trace chemotherapeutic waste and pathological waste) will be treated by steam sterilization disinfection using autoclave unit(s) with associated boiler(s). This treatment technology is a Texas Department of State Health Services approved treatment technology. The process consists of placing the untreated waste in a pressure vessel/autoclave unit and forcing steam into the chamber and through the waste. When the waste is exposed to the proper temperatures for the approved time, the waste will be rendered sterilized. The parameters of time, temperature and pressure of the autoclave(s) used at this facility will meet or exceed those required by the Department of State Health Services requirements for steam disinfection found in 25 TAC §1.133(b)(4)(B). 25 TAC §1.133(b)(4)(B) states that when subjecting waste to steam under pressure, the temperature in the chamber of the autoclave must reach at least 121 degrees Celsius and there must be at least 15 pounds per square inch gauge pressure for at least 30 minutes. Autoclave bins loaded with untreated waste are rolled into the autoclave unit for treatment.

Temporary Storage of Treated Waste: Autoclave bins containing treated waste will be emptied into waste compactor, enclosed trailer, and/or covered container. Treated waste will be temporarily stored on-site and then transported off-site for disposal at a TCEQ approved municipal solid waste landfill.

Transport of Treated Waste to MSW Landfill: Treated waste will be transported to a TCEQ permitted landfill for disposal.

Empty Container Washing: The empty waste containers will be washed with pressurized water and detergent. Clean containers will be returned to generators for reuse.

Paper Shredding: Paper such as confidential documents will be shred with a paper shredder. Shredded paper may be baled recycled and/or disposed of at a municipal solid waste landfill.

Cardboard Baling: A cardboard baler may be used to compress and bale cardboard boxes. The baled cardboard may be recycled.

Temporary Storage of Hazardous Waste in Transit: Hazardous waste in transit will be temporarily stored in a designated area for 10 days or less. Proper notification (TCEQ Form 00002) will be submitted to TCEQ's Registration and Reporting Section for this activity.

ATTACHMENT 9

TEXAS DEPARTMENT OF TRANSPORTATION COORDINATION LETTERS

ARDURRA
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June 19, 2025

David M. Salazar, Jr., P.E.
Fort Worth District Engineer
Texas Department of Transportation
2501 W. Loop 820
Fort Worth, Texas 76133

Re: Request for Coordination Letter
Daniels Arlington Facility
Proposed Medical Waste Management Facility
3221 E. Randol Mill Rd, Arlington, Tarrant County, Texas 76011

Dear Mr. Salazar:

The purpose of this letter is to request documentation of coordination with the Texas Department of Transportation for traffic and location restrictions in accordance with requirements set forth in the Texas Commission on Environmental Quality (TCEQ) Regulations regarding medical waste management, specifically 30 TAC §326.71(e)(4).

Ardurra Group, Inc. is preparing a TCEQ application for a medical waste facility to store, transfer and treat medical waste from health-care related facilities. The location for the facility is 3221 E. Randol Mill Rd, Arlington, Texas. A map depicting the location is attached.

The facility will utilize mostly box trucks and some tractor trailers with a maximum trailer length of 28 feet. A maximum of 30 vehicles/day are expected to access the facility at full operating capacity. This volume will be distributed throughout the day and will not cause disruption of normal traffic patterns. Interstate 30, Highway 360, Highway 161, Highway 180, N. Great SW Parkway, and E. Randol Mill Rd are the main roadways that will normally provide access to the facility. No public roadway improvements such as turning lanes are proposed for this facility.

Please provide a response letter providing traffic and/or location restrictions, if any, on roadways within 1 mile of the facility. If there are no restrictions, please provide a response letter stating so. The information provided will be used to document coordination with your agency, to show adequate road service for the facility and to show that added traffic will not adversely affect the roadways.

Thank you for your assistance. If you have any questions, please feel free to contact me at (361) 883-1984 or [redacted].

Sincerely,

Amy R. Hesseltine, P.E.
Project Manager

Attachment

cc: Justin Thomey, P.E., Fort Worth Area Engineer
Daniel Poole, P.E. Euless Area Engineer
Madison Howard, Texas Commission on Environmental Quality, Municipal Solid Waste Permits


3221 E. Randol Mill Rd
Proposed Medical Waste Facility
Daniels Arlington Facilty
(TCEQ Application - TXDOT Coordination)
CP Waggoner Park
N Carrier Pkwy
President George Bush Tpk
Texas Collision Centers
NEW YORK PIZZERIA
Six Flags Dr
Six Flags Over Texas
Whataburger
3221 E. Randol Mill Rd
January Ln
NW 19th St
Pioneer Restaurant
E Division St
Hotel and Spa Trademark Collection
Shoot Smart. Range. Training. Gunsmith
W Main St
Jack Cooper Transport
E Abram St
Daiquiri Depot
S Great SW Pkwy
30
360
161
Google Earth
© 2023 Google
1 mi
N

ATTACHMENT 14

MANUFACTURER SPECIFICATIONS

BONDTECH

MEDICAL WASTE

& BIOLOGICAL CONTAMINATED WASTE TREATMENT SYSTEMS

USDA APHIS

FULLY AUTOMATED & SEMI AUTOMATED OPTIONS AVAILABLE

BONDTECH
TREATMENT TECHNOLOGY
Toll Free: 1 (800) 414-4231
Email: sales@bondtech.net

DESIGN · ENGINEERING · FABRICATION · CONTRACTING

BONDTECH TREATMENT TECHNOLOGY


Typical Hospital Installation of a Bondtech Autoclave System

Bondtech has been supplying high vacuum/high pressure autoclave systems to the waste treatment industry for over thirty (30) years.

Bondtech has made a total commitment to provide a reliable as well as a durable autoclave system.

Bondtech is the world's largest supplier of autoclave systems for the medical waste/ biological waste industry. Our ability to provide high quality equipment at competitive prices has made us the proven leader in the autoclave/sterlization market and it has given us the respect of the industry.

Services We Offer:

- Turnkey Site Design
- Engineering
- Permitting
- Environmental Impact

- Equipment
- Autoclaves
- Shredders
- Compactors
- Material Handling

- Supplies
- Waste Bins
- Autoclavable (High Temperature) Bags
- Medical Waste Containers
- Spare Parts

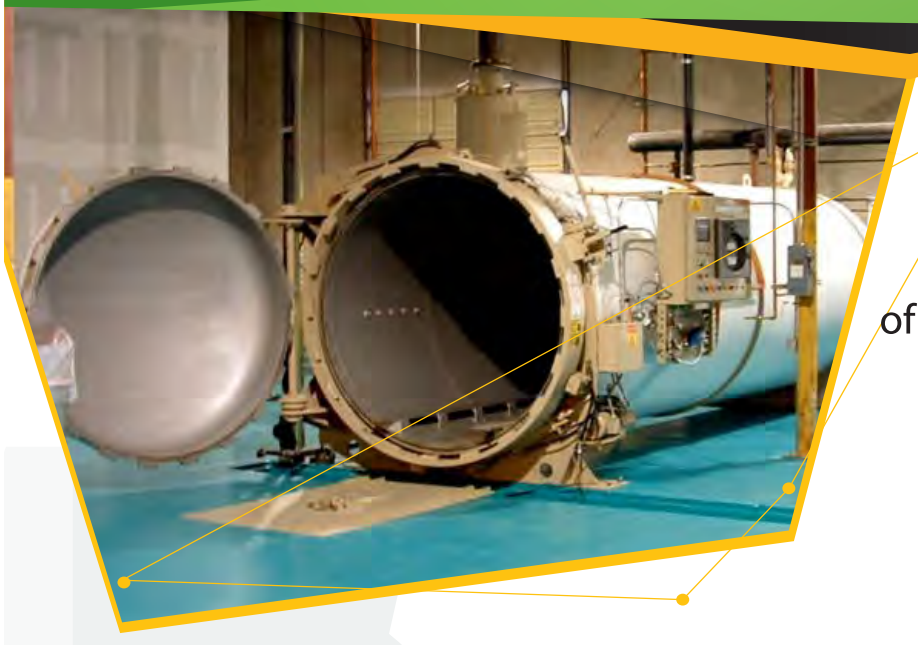
- Technical Support
- Preventative Maintenance
- Calibration
- Operator Certification Training

Direct: (606) 677-2616 • Toll Free: (800) 414-4231
1278 Highway 461 · Somerset KY 42503

BONDTECH
TREATMENT TECHNOLOGY

THE BONDTECH DESIGN

ABOUT US



Bondtech Corporation is the world leader in the design, engineering and manufacturing of high-tech autoclave systems for disinfection and sterilization of infectious wastes and biological wastes.

WASTE TYPES INCLUDE:

- Infectious
- Medical
- International/Foreign Origin
- Biological Contaminated
- USDA/APHIS
- Food

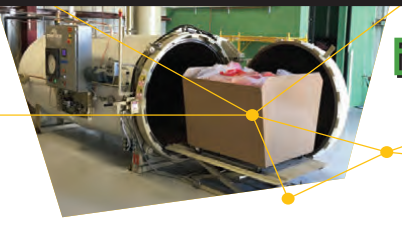
Process Description

Bondtech Treatment Technology Systems are designed for high vacuum and high pressure capability. Bondtech proprietary designed autoclaves are subject to a pre-vacuum cycle, saturated steam cycle and a post-vacuum cycle to facilitate faster and more uniform penetration of steam into the medical waste to be treated.

Bondtech autoclave's high vacuum is achieved by using a proven proprietary vacuum system design. Bondtech autoclaves are supplied with a locking ring, quick opening door which is used in the most sophisticated aerospace autoclaves, and designed with safety in mind. In this particular design, the door is stationary and the locking ring is mounted on the periphery of the vessel and is rotated through a short arc by hydraulic cylinders located on the side of the vessel.

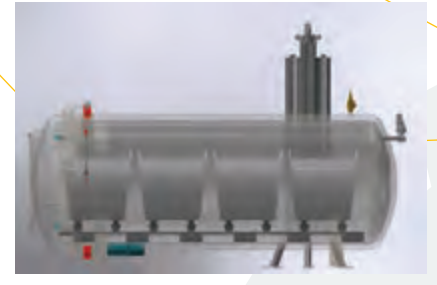
TREATMENT METHOD

PROCESS DESCRIPTION



Bin Loading: Autoclave bins are loaded with infectious waste and are transferred into the autoclave vessel for treatment. *This process can be performed by an automated or semi-automated conveying system.*

Treatment: The autoclave is controlled by the state-of-the-art programmable logic controller (PLC) with modem hook up capabilities for online support. The autoclave can be manufactured with an automatic or semi-automatic material handling system.



Record Keeping: Bondtech Autoclave Systems have an automated chart recorder and/or strip recorder, at the control panel which continuously records and generates the temperature, vacuum and pressure data. This information is maintained on permanent, hard copy records for each load of medical waste treated, further complying with quality control and satisfying environmental regulatory requirements. In addition Bondtech provides the capability to export digital data to provide historical record keeping.

Unloading: Once the cycle is completed, a green light will be illuminated indicating the door is ready to be opened. The operator will then unload the autoclave and the bin dumper will empty the bins into a compactor or a shredder.

Shredders: Bondtech shredders are heavy duty, single or double stage shredders to meet required particle size. Each knife configuration has been designed to suit the material for maximum throughputs and optimum size.

Advantages and Waste Volume Reduction:

After autoclaving and compaction the waste volume is reduced in excess of 75%. Further volume reduction can be realized with the installation of an optional post-treatment shredder. The major advantages of steam sterilization are the low costs associated with this process as well as the reliability of this well-known technology.

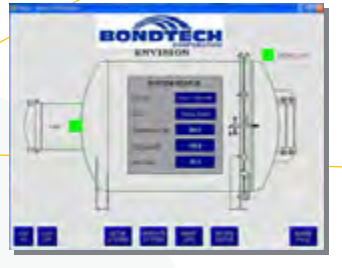
TECHNICAL BACKGROUND

"PROVEN AND RELIABLE MEDICAL WASTE TREATMENT SYSTEMS"

Bondtech has designed, supplied and installed over 1,500 autoclave systems worldwide for various applications. Today, ***Bondtech Treatment Technology systems*** are processing over 6 million pounds (3 million kg) per day (over 1 million+ tons per year) of medical waste.

BTT PLC Control System

Bondtech Corporation's high performance control and data acquisition systems have been thoroughly proven in high-tech aerospace manufacturing plants.



The BTT PLC control system is designed to provide maximum flexibility to address any site specific waste treatment requirements.

BTT systems can be configured with the following options:

- Color Graphics Display illustrating real time data and autoclave cycle conditions.
- Weight Scale Integration
- Hard Drive Data Acquisition

The Following Features Have Made Bondtech the Worldwide Leader in Biomedical Waste Autoclaves:

- **Ruggedly Designed and Built for Commercial Use.**
- **Hydraulic Quick Opening Door/with Safety Pin Interlock.**
- **Vacuum Pump or Vacuum Ejector for High Vacuum Operation.**
- **Temperature Probes for Added Protection Assurance.**
- **Programmable Control Systems.**
- **Recorders.**
- **Packaged and Modularized for Easy Installation.**
- **Volume Reduction Achieved by the Vacuum Cycle and the Heat Cycle and Further Reduced by Shredding.**
- **Weight Reduction at Time of Final Disposal Achieved by Removal of Moisture.**
- **Built in Strict Accordance with the ASME Boiler and Pressure Vessel Code, Section VIII, Division 1.**

World Wide Installations

Bondtech has installed autoclaves on all Continents.

IMPORTANT FACTORS TO CONSIDER

Today, landfills across the world, where medical waste is regulated, accept autoclaved medical waste. Medical waste that is properly autoclaved is rendered noninfectious and safe for disposal at sanitary landfills. The autoclaved medical waste does not generate any leachate characteristics (heavy metals, etc.), as found in ash generated by incinerators.

To maximize landfill space, autoclaved medical waste can be safely compacted to achieve over 75% volume reduction. Further reduction can be realized by installation of an optional shredder. The shredding process is performed only after the waste has been treated by the ***Bondtech Autoclave System***. Today the bulk of the medical waste treatment capacity is by autoclave technology.

The steam autoclave is the most popular and effective medical waste treatment technology. Unlike the incinerator, the autoclave technology does not generate any hazardous combustion air pollutant emissions, such as hydrochloric acid, carbon monoxide, dioxin/furnans, metal (particulate matter), etc.

The autoclaved medical waste byproduct is sanitized and safe for landfill disposal. More than 90% of the newly permitted North American commercial medical waste facilities since 1990 employ state of the art autoclave technology by ***Bondtech***.

Bondtech Corporation is the world's largest supplier of commercial medical and USDA waste autoclave treatment systems, we process more waste than any other technology world wide.

In an effort to assist our customers with the reliable equipment as well as a one-stop accountable supplier, ***Bondtech*** also offers the following auxiliary equipment and accessories.

- Shredders for biomedical waste, sharps and paper destruction
- Reusable medical waste containers
- Aluminum and stainless steel bins
- Red bags and Chemo bags
- Compactors and balers
- Bin Dumpers
- Autoclave bags
- Scissor lifts
- Boilers and more

Visit us on the Web!
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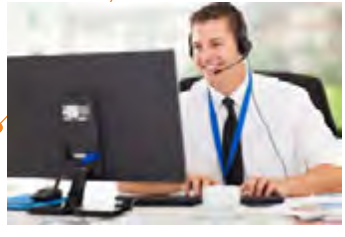
BONDTECH AUTOCLAVE SERVICE, ENGINEERING & PERMITTING

- Control system repair or replacement, including complete redesigns and modernization with or without automation.
- Installation and Start-up of your new or existing autoclave system
- Trouble shooting control or equipment issues
- Testing and calibration
- Engineering services
- Complete system refurbishment services, in our shop or on your site
- Medical waste autoclave Engineering and Permitting





Field Installation and Repairs

Bondtech has been installing and repairing autoclaves for more than 30 years. We are able to work with any type of autoclave fast and effectively. We can supply you a new autoclave and field install it on a timely basis.

Bondtech field service is first class and covers, but is not limited to the following:

- New or Used Autoclave Installations
- New or Used Autoclave Start-up
- Autoclave shell code welding and repair
- Vessel integrity testing as per ASME requirements
- On-site inspections
- Misc. field work and modifications as per customer's requirements
- Field installation of Hodge or Harris Quick opening doors
- Hodge or Harris Quick opening door re-wedging, and roller replacement/repair
- Hodge or Harris Hydraulic cylinder repair or replacement
- On-Site Operations

Support Service

There are various options for this service, and you may pick one that best suit your needs:

Standard

Service is provided Monday-Friday, 8:00am – 5:00pm EST. Our Service Technicians will work with you to provide technical and troubleshooting advice via telephone or remote desktop support (if available).

Preferred

One day on-site service support. This service is scheduled and can be provided outside working hours (additional charges may apply). Our Service Technicians will work directly with you to troubleshoot your issues. A Report of Findings and/or Inspection Report will be provided.

Exclusive

Three Day on-site startup and training. After purchase of a new or refurbished system, we can provide supervision during the installation of the system. Once the installation is complete, our technicians will train operators on the control systems and preventative maintenance. We will provide preventive maintenance service and operator's training once a year for 3-years from the time of commissioning.

Emergency

Required service with Less than 24-hour notice.

All Service Plans include Telephone Support

Bondtech Field Service Features

- **24-48 hour emergency service**
- **Experienced and professional**
- **Cost Effective**
- **Reduction of downtime**
- **Extended service life**
- **Sole source responsibility**

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HIGH TEMP LINERS

"PROTECT YOUR INVESTMENT"

EASY AS 1...2...3...

1. LINE THE EMPTY AUTOCLAVE CART

2. DEPOSIT WASTE IN TO CART AND TREAT

3. DUMP THE TREATED WASTE

Ever melted those cheap liners and bags when autoclaving? Is cleaning your messy autoclave carts a bother? Protect your investment! Get ***Bondtech's*** high heat and easy to install "***PRO-TECH***" liners for your autoclave carts or other high temperature lining purpose.

The ***Bondtech*** "***PRO-TECH***" liners provide several advantages to enhance your operation:

- Utilizing will extend the life cycle of every cart
- Reduce wear and tear on your dumper by dumping the treated waste easily.
- Enhance perception of clean/safe operation: Maintain carts free of debris.
- Eliminate a potential source of nuisance odors.
- Eliminate labor required to periodically remove waste debris from carts.
- Consistent full capacity utilization, eliminating waste build-up inside carts.
- Reduce occupational exposure, potential injuries related to cleaning waste from carts.

Bondtech's "***PRO-TECH***" liners are custom made to meet our customer's specifications.

Optional customization options include:

- ***Size***
- ***Gauge***
- ***Printed / Unprinted***
- ***Temperature Strips***
- ***Color***

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MEDICAL WASTE

CONTAINERS

ALL CONTAINERS MEET ALL D.O.T. REGULATIONS

Med770 - 200 Gallon Red

- Leak-proof, Spill-Proof
- Tamper-Proof
- Puncture Resistant
- Reinforced
- 4" Rubber Wheels Standard

Additional Sizes Available

- Useful for Large Volumes of Waste
- Ideal for using one container per floor

Med360 - 96 Gallon Red

- Stackable
- Easy to Handle
- Slim Line Design
- Roto-Lock for Tamper Proofing
- Dimension 24" W x 35" D x 43" H
- 8" Rubber Wheels Standard *Additional Sizes Available*

18-38 Gallon Containers

- Durable Design · Snap fit lid
- Resistant to leaks and punctures
- Nesting bins and lids
- Stackable, Easy to Handle
- Injection molded handles for manual handling

Med18

- 18 Gallon Red
- 18.9" W x 18.9" D x 15.25" H

Med28

- 28 Gallon Red
- 18.9" W x 18.9" D x 22.9" H

Med38

- 38 Gallon Red
- 18.9" W x 18.9" D x 32.5" H

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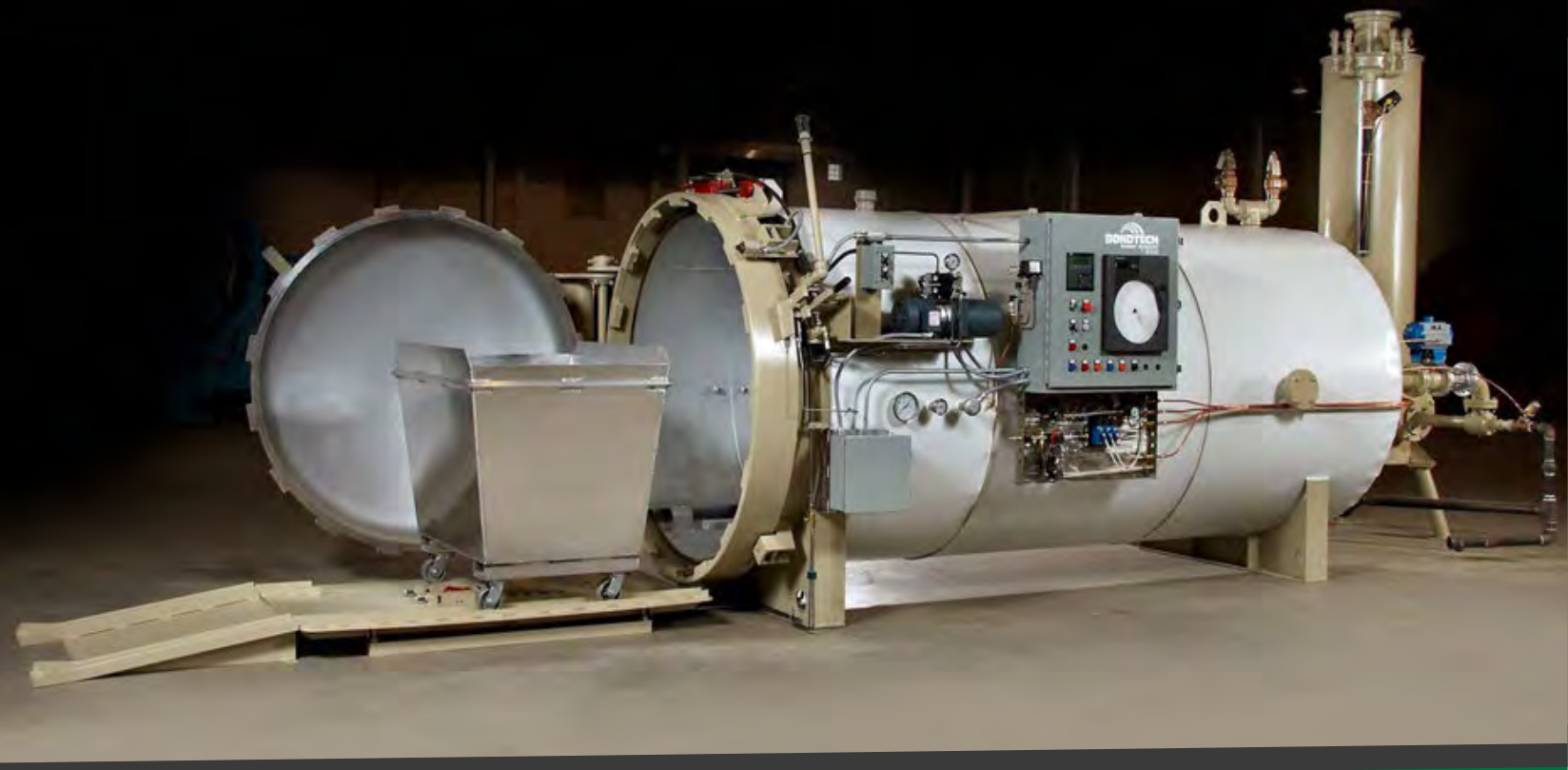
TREATMENT TECHNOLOGY



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- Aerospace Composites
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- Medical Waste
- Wood Treatment
- APHIS Waste
- Foreign Origin Waste
- Glass Lamination

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DESIGN · ENGINEERING · FABRICATION · CONTRACTING

WALKING FLOOR TRAILER/UNLOADING TRAILER

PRODUCTION BUILD SHEET **CODE: WF**

EAST UNLOADER TRAILER

CLOSED TOP [X]

SCHEDULE DATE : _____

ITEM:

CUSTOMER: HALE-ALLENTOWN-MARKERT **DATE:** 8/19/2024 **SERIAL #**

Q8112B **REF: 81967**

BODY:		TAILGATE:		CHASSIS:	
WIDTH (INCHES)	96	HEIGHT	FULL	MODEL	TANDEM
LENGTH (FEET)	50	TYPE TT SPLIT	45% GATE WEDGE	TYPE	ALUM SUB FRAME
HEIGHT (INCHES)	100	STYLE	SHEET & POST	AXLE TO AXLE	49"
SIDE MAT'L	3/16" (7)	MAT'L THICKNESS	3/16"	REAR AXLE SETTING	50.5"
TOP RAIL	UNLOADER	S / S HINGE ON	STEEL PIANO HINGE	5TH WHEEL HT	49"
ROOF	FULL (8)	GATESEAL	RUBBER WATER SEAL	PIN SETTING	36" + 3/8" KP PLATE
ROOF MAT'L	GENESIS	GATE LADDER	NONE	SUSPENSION	REYCO 21B
BULKHEAD	1/4" (1)	TARP HOOKS	NONE	SPRINGS	SINGLE LEAF
TARP HOOKS	NONE	WINDERS	3 ON BOTTOM-EVENLY	AXLES	TP SPINDLES
TARP BASKET	NONE	GATE GUIDE	YES	BRAKES	16-1/2" x 7"
TARP	NONE	GATE CONTROL MECH	PADDLE LATCH	DUSTSHIELDS	YES
CATWALK	NONE	POCKETS	FABBED / EXTRUDED	BRAKE CHAMBERS	ON TOP OF AXLE
B.H. LADDER	COMMERCIAL D/S	CROSSPIPE (S)	NONE	ABS	4S / 2M
CROSSMEMBER	"I" BEAM -12" C/L			HUBS	10 S STEEL
FLOOR MAKE	KEITH - 3" DRIVES			DRUMS	CAST
FLOOR MAT'L	2145 - LP-III (14)	COMPACTOR:		WHEELS	8.25" x 24.5"
WEARPADS	NONE	SIDE LATCH	NO		STEEL DISC
HORIZONTALS	YES	CENTER LATCH	YES	TIRES	11R 24.5" R250ED
45° DIRT SHEDDERS	8" SMOOTH	PIN DIA.	3"		BS 16 PLY
TARP BAR	NONE			DOLLIES	2 SPEED JOST A451
TAPE COLOR	BLUE	HYDRAULICS:		LOCATION	D/S CRANK
LIGHT PANEL	LED IN TAILGATE	HOSES	TWO 4000PSI	BUMPER	STEEL UNDERRIDE
MARKER LIGHTS	LED -(3)	LENGTH	108"	TOW HOOK(S)	TWO
MIDMOUNT SIGNALS	LED - MODEL 60	FITTINGS	PUSH-PULL	PUSH BLOCKS	NONE
MUDFLAPS	YES	HP	1" WINGNUT	PAINT	BLACK
HOSE HANGER	D/S BY LADDER	LP	1 1/4" WINGNUT		
TIRE CARRIER	NONE	HOSE LOCATION	DRIVER SIDE		
		AIR & ELECTRICAL	DRIVER SIDE		

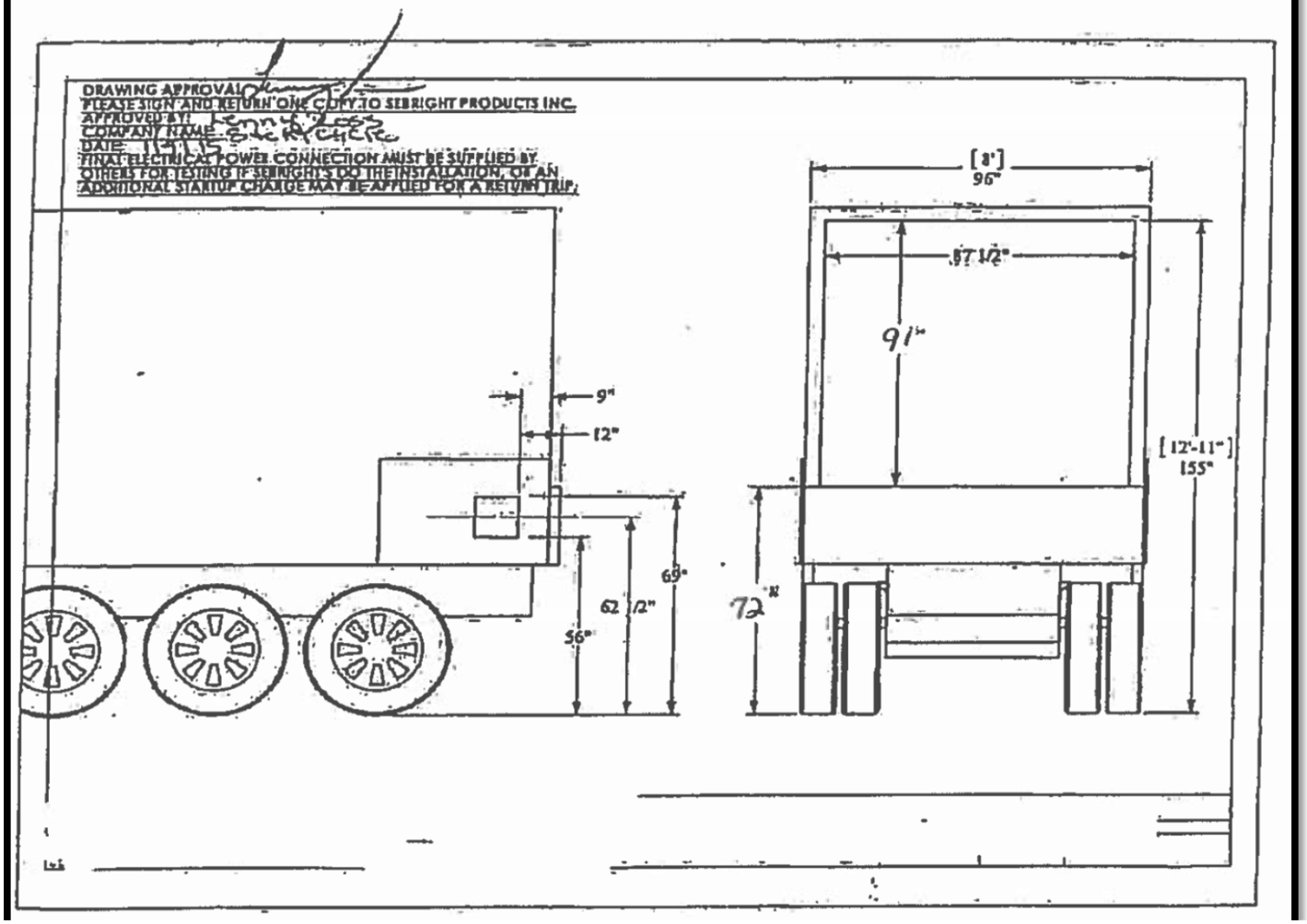
REMARKS: REF 81967

1. NO INSIDE BULKHEAD STEPS.
2. STAINLESS STEEL HARWARE ON SLOPE PLATE.
3. 3 PAIR PER SIDE TOP & BOTTOM BOXED IN.
4. FILTERED GLAD HANDS.
5. ADD REGISTRATION HOLDER TO D/S LANDING GEAR BRACKET TRUCKLITE 536-05015-20.
6. ALUMINUM AIR TANKS TO HAVE CABLE OPERATED DRAINS EXTENDED TO D/S BOTTOM RAIL.
7. 3/16" SIDES WITH LAST 80.5" TO BE 1/4". ADD 3 EXTRA UPRIGHTS.
8. FULL 50' OF LID TO BE .150 GENESIS PANELS
9. TWO 3" DRAINS W/ STAINLESS STEEL BALL VALVES & STAINLESS STEEL DRAIN PIPES @ REAR-1 EACH SIDE..INSTALL FROM BOTTOM SO NOT ABOVE FLOOR LEVEL.
10. UNIT MUST BE COMPLETELY SEALED AND HAVE NO LEAKS-WATER TEST UNIT
11. ONE FULL LENGTH - TRIPLE ROWS LAST 7 PANELS
12. 45 DEGREE GATE WEDGE INSIDE.
13. FROM GROUND TO TOP OF LOWER DOOR TO BE 72"
14. KEITH K-2145 LP-III (LEAKPROOF) FLOOR WITH 3" DRIVES
15. EXTEND THE GATE RELEASE HANDLE AFTER THE BEND WHERE CUSTOMER GRABS IT

OVERALL HEIGHT (FT) 12.92 **EMPTY WEIGHT (#)** 20,833 **CUBIC YARDS** 113

(EMPTY WEIGHT VARIANCE +/- 3%) **DS**

HALE 55336


DRAWING APPROVAL
PLEASE SIGN AND RETURN ONE COPY TO SEBRIGHT PRODUCTS INC.
APPROVED BY:
COMPANY NAME:
DATE:
FINAL ELECTRICAL POWER CONNECTION MUST BE SUPPLIED BY
OTHERS FOR TESTING IF SEBRIGHT'S DO THE INSTALLATION, OR AN
ADDITIONAL STARTUP CHARGE MAY BE APPLIED FOR A RETURN TRIP.
[8']
96"
57 1/2"
91"
[12'-11"]
155"
9"
12"
69"
62 1/2"
56"
72"

ATTACHMENT 15

OTHER SITE OPERATING PLAN, FINANCIAL ASSURANCE, AND CLOSURE REQUIREMENTS

true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fines an imprisonment for knowing violations."

§326.75(e)(4) Records Availability

All information contained in the operating record will be furnished upon request to the executive director and will be made available at all reasonable times for inspection by the executive director.

§326.75(e)(5) Records Retention

The owner or operator will retain all information contained within the operating record and the different plans required for the facility for the life of the facility.

§326.75(e)(6) Alternate Record Keeping Schedule

Alternate schedules for recordkeeping and notification stated above may be set by the executive director.

§326.75(e)(7) Shipping Document

When accepting delivery of untreated medical waste for which a shipping document/manifest is required, the owner or operator will ensure each of the following requirements is met:

(A) A shipping document accompanies the shipment, which designates the facility to receive the waste;

(B) The owner or operator signs the shipping document and immediately gives at least one copy of the signed shipping document to the transporter;

(C) The owner or operator retains one copy of the shipping document; and

(D) Within 45 days after the delivery, the owner or operator sends a written or electronic copy of the shipping document to the generator that includes the total weight of waste received and a statement that the waste was treated in accordance with 25 TAC §1.136 (relating to Approved Methods of Treatment and Disposition).

Copies of waste shipping documents will be maintained at the facility for three years. The shipping documents may be maintained in electronic format.

§326.75(f) FIRE PROTECTION

An adequate supply of water under pressure for firefighting purposes is available via fire hydrants located along E. Randol Mill Rd and 110th Street. Firefighting equipment such as fire extinguishers will be readily available at the facility. A Fire Protection Plan is included in Attachment 16 of this Application for a Medical Waste Registration.

§326.75(g) ACCESS CONTROL

§326.75(g)(1) Public Access Barriers

Public access to the facility will be controlled by artificial barriers appropriate to protect human health and safety and the environment. Fencing, locked gates, and buildings are used to control access to the facility. The northern and western boundaries have a six foot high chainlink fence topped with barbed wire. Along the boundary with the adjoining property to the southwest, there is also a six foot tall chainlink fence. The facility has two locked gates. The entrance to the facility along 110th Street has a sliding gate/swing gate combination. There is a steel gate between the facility and the adjoining property to the southwest. Building walls, lockable doors, and a chainlink

fence control access to the waste processing building where waste processing and storage occurs. The figures in Attachment 2 call out the fencing, entrance gate, and buildings referenced in this section.

§326.75(g)(2) Access Roads, Vehicle Parking, and Safety Measures

The facility will be accessed from publicly owned roads (E. Randol Mills Rd. and 110th Street). E. Randol Mills Rd. is concrete paved six-lane road (three-lane each direction) with grass median. At the entrance to the facility, 110th Street is asphalt paved two-lane road. There is adequate turning radii for the vehicles expected to access the facility. Within the facility, are concrete paved driving and parking areas. Vehicle parking is provided for equipment, transport vehicles, employee vehicles, and visitor vehicles. Safety bumpers will be provided at hoppers.

Dust and mud are not anticipated due to the access roads and on-site parking areas being paved. Public roads used by transport vehicles to access the facility are paved. Access roads and parking areas within the facility are also paved. In the event there is a problem related to windblown dust, water will be used to control windblown dust. Within the facility, a standard garden hose connected to an on-site water source may be sufficient to apply water.

§326.75(g)(3) Perimeter Fencing

Access to the facility is controlled by fencing, locked gates, and buildings. The northern and western boundaries have a six foot tall chainlink fence topped with barbed wire. Along the boundary with the adjoining property to the southwest is also a chianlink fence. The facility has two locked gates. The entrance to the facility along 110th Street has a sliding gate/swing gate combination. There is a steel gate between the facility and the adjoining property to the southwest. Building walls, lockable doors and a six foot tall chainlink fence control access along the eastern boundary of the facility. Transport vehicles and compactor/roll-off units storing treated waste are surrounded by fencing. An attendant will be onsite during operating hours.

§326.75(h) UNLOADING OF WASTE

§326.75(h)(1) Waste Unloading Area

The unloading of waste will be confined to as small an area as practical. A trained employee will monitor all incoming loads of waste to help prevent the receipt of prohibited waste and to direct the unloading of waste. The owner or operator is not required to accept any waste which they determine will cause or may cause problems in maintaining full and continuous compliance with applicable regulations. Signs may be used to indicate where vehicles are to unload.

§326.75(h)(2) Unauthorized Waste Unloading Areas

The unloading of waste in unauthorized areas will not be allowed. Vehicles will only be allowed to unload material within the processing area and dock area or transfer the material to another transport vehicle/trailer. Any waste deposited in an unauthorized area will be removed immediately and managed properly.

§326.75(h)(3) Prohibited Wastes

Only those waste streams specified in this registration application will be unloaded. The unloading of prohibited wastes will not be allowed. Incoming waste will be inspected by a trained employee. Any prohibited waste discovered prior to unloading will be rejected and returned promptly to the transporter or generator of the waste.

In the event unauthorized materials are unloaded at the site, the material will be rejected and the transporter will be required to immediately remove the waste along with any contaminated materials from the facility. Any undisclosed prohibited waste discovered after unloading will be

REDLINE/STRIKEOUT COPY

Section 2—Facility Design Information

2.1 Impact on Surrounding Area [30 TAC §326.71(a)(5)(A) & (B)]

This section addresses the facility's impacts on cities, communities, groups of property owners, or individuals (attach additional pages to answer the following questions, if necessary):

Describe the character of the surrounding area land uses within one mile of the facility:

The area surrounding the facility is predominately industrial. A residential subdivision is located approximately 0.61 miles east of the facility.

Identify growth trends within five miles of the facility with directions of major development:

The area within 5 miles of the facility is has been developed for over a decade. There is limited undeveloped tracts within 5 miles for development

Indicate the approximate number of residences and other uses (e.g. schools, churches, cemeteries, historic structures and commercial sites, etc.) within one mile of the facility:

Within approximately 1 mile of the facility are an estimated 450 residences, 150 commerical site, 2 churches, and 1 cemetary. No public schools or historic structures were found within 1 mile of the facility.

Indicate the distance to the nearest residence(s): 0.61 ☐ feet ☒ miles

Provide directions to the nearest residence(s):

0.61 miles east of the facility

Indicate the distance to the nearest commercial establishment(s): 0.01 ☐ feet ☒ miles

Provide directions to the nearest commercial establishment(s):

0.01 miles west

2.2 Transportation [30 TAC §326.71(e)]

Access Roads

Complete Table 1 regarding the roads that will be used to access the site.

Table 1. Roads That Will be Used to Access the Site.

Name of Road	Surface Type and Number of Lanes
E. Randol Mill Rd	Concrete, 6-lane divided (3 each direction)

Name of Road	Surface Type and Number of Lanes
State Highway 360	Asphalt, 6-lane divided (3 each direction)
State Highway 161	Concrete, 8-lane divided (4 each direction)

Daily Traffic Volume

Complete Table 2 regarding existing and expected volume of vehicular traffic on access roads within one mile of the facility, and the projected volume of traffic expected to be generated by the facility on access roads within one mile of the facility.

Table 2. Traffic Volume.

Vehicle Traffic	Volume (vehicles per day)
Existing Vehicle Traffic	~~5562~~ 6011 (2023) ~~(2019)~~
Expected Vehicle Traffic	7787 (2042)
Projected Vehicle Traffic Generated by Facility	30

Describe the source of or method used to obtain the volumes (attach additional pages to answer this question if necessary):

Existing (2023) average annual daily traffic (AADT) was obtained from Alamo Area MPO (https://geoportal-mpo.opendata.arcgis.com/datasets/TXDOT::txdot-annual-daily-traffic-counts-public/explore) and future/expected (2042) AADT was obtained from TxDOT Statewide Planning Map (txdot.gov/apps/statewide_mapping/statewideplanningmap.html)

If traffic volume was determined by counts in the field, indicate the locations where the counts were conducted (attach additional pages to answer this question if necessary):

N/A

2.3 Floodplain and Wetlands [30 TAC §326.71(f)]

Will the facility be located within a 100-year floodplain?

Yes ☐ No ☒ Identify the floodplain zone Zone X, See Attachment 10 for FEMA Map (Map Number 48439C0360L effective 3/21/2019). Zone X is not in the 100-year floodplain. Therefore, additional documentation is not required to demonstrate that the facility is designed and will be operated in a manner to prevent washout of waste during a 100-year storm event. The facility will be constructed, maintained, and operated to manage run-on and run-off during the peak discharge of a 25-yr rainfall event and will prevent the off-site discharge of waste. Surface water drainage in and around the facility will be

controlled to minimize surface water running onto, into, and off the storage, transfer, and waste processing areas. Waste processing will occur inside the building which is covered and elevated above natural ground and surface water drainage. Waste transfer will occur at the covered loading docks or from vehicle to vehicle. Both waste transfer methods keep the waste in areas elevated above natural ground and surface water drainage. Waste will be stored inside the building, in closed transport vehicles or in covered waste containers.

The facility will obtain the appropriate Texas Pollutant Discharge Elimination System (TPDES) storm water permit coverage when required.

Attach a copy of the Federal Emergency Management Administration administrator (FEMA) flood map for the area.

If the facility will be within a 100-year floodplain, attach documentation demonstrating that the facility is designed and will be operated in a manner to prevent washout of waste during a 100-year storm event, or that the facility has obtained a conditional letter of map amendment from the FEMA.

Will the facility be located in wetlands?

Yes ☐ No ☒

If yes, attach documentation to the extent required under Clean Water Act, §404 or applicable state wetlands laws.

2.4 Buffer Zones and Easement Protection [30 TAC §326.71(h)(3)]

Is the buffer zone in any location at the facility less than 25 feet wide?

Yes ☒ No ☐

If yes, describe your alternative buffer zone and how it will allow access for emergency response and maintenance (attach additional pages to answer this question if necessary):

A 25 ft buffer is not feasible because of location of existing building and covered platform with docks in relation to property boundary. Waste processing will be conducted inside of the enclosed waste processing building. The waste processing building is on the eastern property line/registration boundary, approximately 15 ft from the western property line, and approximately 20 ft from the northern property line/registration boundary. The covered docks are approximately 11 ft from the southern property boundary/registration boundary. The proposed alternative buffers coincide with the distance between the registration boundary and the existing structures. Refer to Facility Location Map in Attachment 2 for locations and distances of alternative buffers. Access to the facility is from the south and west sides where 25 ft buffer will be maintained. Since the alternative buffers coincide with exiting structures, the alterative buffers do not impose additional limitiations to access. The alternative buffer zone affords ready access for emergency and response vehicles. No solid waste loading/unloading, transfer, storage, or processing will occur within the buffer zone or any easement crossing the registration boundary. Temporary waste storage in locked, refrigerated transport vehciles parked in the buffer zone, however is allowed.

2.5 Waste Management Unit Designs [30 TAC §326.71(i)]

Waste Management Unit Details

List each waste management unit in Table 3. Include attachments documenting manufacturer specifications.

Table 3. Design Details and Manufacturer Specifications for Waste Management Units.

Unit Type	Minimum Number of Units	Design Details	Approximate Dimensions	Approximate Capacity per Unit
Autoclave	1	See Attachment 14	6 ft by 34 ft	5000 lb/cycle
Boiler	1	See Attachment 14	Length: 13.5 ft Width: 6.5 ft Height: 7 ft	6,696,000 btu/hr
Cart Tipper	1	Typical Hydraulic Cart Lift/Tip	Length: 36" Width: 58" Height: 72"	300 lbs / tip
Tunnel Washer	1	See Attachment 14	Length: 32 ft Width: 7 ft Height: 7 ft	20,000 units/week
WashSmart	1	See Attachment 14	Length: 36 ft Width: 19.5 ft	30,000 units/week
Refrigerated Tractor Trailer (or equivalent)	1	Typical standard freight trailer (or equivalent)	Length: 24, 48, or 53 ft Width: Typical Height: Typical	18 tons
Compactor	1	Typical self contained compactor or Typical staionary compactor and container	Length: 22.5 ft Width: 8.25 ft Height: 8.5 ft	34 cubic yards

Unit Type	Minimum Number of Units	Design Details	Approximate Dimensions	Approximate Capacity per Unit
Walking Floor Trailer/Unloading Trailer	1	See Attachment 14	Length: 50 ft Width: 8 ft Height: 8.5 ft	113 cubic yards

Foundations and Supports

Provide a generalized description of construction materials for slab and subsurface supports of all storage and processing components (attach additional pages to answer this question if necessary):

Medical waste processing and storage will be conducted inside the existing building supported on the concrete foundation capable of supporting the waste processing equipment. Waste processing equipment will be installed on the existing concrete foundation. No additional foundation reinforcement will be required to support the equipment.

Contaminated Water Management

Describe how storage and processing areas will be designed to control and contain spills and prevent contaminated water from leaving the facility. For unenclosed containment areas, also account for precipitation from a 25-year, 24-hour storm (attach additional pages to answer this question if necessary):

Waste processing units will be located in the enclosed waste processing building which is capable of controlling and containing worst case spills or releases and contaminated water from leaving the facility. Untreated waste will be stored inside the enclosed waste processing building or inside fully enclosed transportation unit(s). Liquids generated during waste processing, container washing, and routine cleaning will be controlled and contained to prevent spills and to prevent contaminated water from leaving the facility. Liquids generated from waste processing is steam condensate which will be discharged to the sanitary sewer system. Water generated from container washing units will be reused in the units or discharged to the sanitary sewer.

Any spills will be immediately contained, collected, and placed into the processing unit or discharged to the sanitary sewer via sink and floor drains in the processing building. Tools that may be used to contain and collect spills include absorbant materials, mop, bucket and/or broom. Any free liquids received at the facility shall be packaged with sufficient sorbent material to absorb 100% of the free liquids within the package in accordance with 49 CFR 173.197(c)(2). Therefore, free liquids should not be generated during potential spills.

Treated waste will be stored in covered compactor, enclosed trailer and/or covered open top container. Since waste is under cover, contaminated water resulting from precipitation in

contact with untreated medical waste will not be generated. Storage of medical waste will be in a secure manner and location that affords protection from theft, vandalism, inadvertent human or animal exposure, rain, water, and wind. The waste will be managed so as not to provide a breeding place or food for inspects or rodents, and not generate noxious odors.

2.6 Treatment Requirements [30 TAC §326.71(j)]

Attach a written procedure for the operation and testing of any equipment used, and for the preparation of any chemicals used in treatment.

3.2 Closure Cost Estimate [30 TAC §326.71(m)]

Provide itemized closure cost estimates in Table 4. The cost estimates must meet the requirements listed in 30 TAC §326.71(m). **Cost are in US dollars.**

Attach documents detailing any additional unit closure costs not itemized. Enter the total of those additional unit closure costs on line 13 of the closure cost worksheet in Table 4.

Table 4. Closure Cost Estimates Worksheet.

Item No.	Item Description	Unit of Measure-ment	Quantity	Unit Cost	Total Cost
1	Site Evaluation and Engineering Review	NA	1	$5000	$5000
2	Bid Document and Procurement	NA	1	$3000	$3000
3	Contract Award and Administration	NA	1	$3000	$3000
4	Clean-Up, Removal and Transport of Waste Stored On-Site	NA	1	$9000	$9000
5	Disposal of Waste at an Authorized Facility	TONS	50	$45	$2250
6	Waste Treatment	TONS	50	$360	$18000
7	Process Units Dismantling	NA	1	$2500	$2500
8	Wash Down and Disinfection of Facility and Processing Units	NA	1	$2500	$2500
9	Vector Control	NA	1	$300	$300
10	Site Security	NA	1	$300	$300
11	Signs, Newspaper Notice and TCEQ Notice	NA	1	$2000	$2000
12	Facility Inspection and Closure Certification by Licensed Engineer	NA	1	$5000	$5000
13	Additional Storage and Processing Unit Closure Cost Items (describe in attachments)	Identify Attachments	NA	NA	0

Item No.	Item Description	Unit of Measure-ment	Quantity	Unit Cost	Total Cost
14	Storage and Processing Unit Closure Costs Subtotal	NA	NA	NA	$52850
15	Contingency Cost 10%	NA	NA	NA	$5285
16	Total Closure Cost Estimate	NA	NA	NA	$58,135

7/31/25

Amy R Hesseltine

FOR PERMITTING PURPOSES

Section prior to temporary storage of hazardous waste in transit. Regulated medical waste will not be stored in the designated 10-day hazardous waste storage area.

There are no waste constituents or characteristics that could be a limiting parameter that may impact or influence the design and operation of the facility.

Describe the sources and characteristics of recyclable materials, if applicable, to be received for storage and processing (attach additional pages to answer this question if necessary):

Acceptable source separated recyclables include confidential documents and cardboard. These waste streams will be received from off-site sources such as hospitals, clinics, nursing homes, and other health care related facilities. Confidential documents may be shredded and recycled. Cardboard boxes may be baled and recycled. Reusable plastic containers may be washed and returned to customers for reuse.

Maximum amount of waste to be received daily: 50 ☐ pounds/day ☒ tons /day

Maximum amount of waste to be stored at any point in time: 50 ☐ pounds ☒ tons

Maximum length of time waste is to remain at the facility: 30 ☐ hours ☒ days

Specify the maximum time that unprocessed and processed wastes will be allowed to remain on-site:

Processed: 10 ☐ hours ☒ days

Unprocessed: 30 ☐ hours ☒ days

Identify the intended disposition of processed and unprocessed waste received at the facility (attach additional pages to answer this question if necessary):

Untreated medical waste will be managed in accordance with 25 TAC Subchapter K and 30 TAC Chapter 326. Materials mixed with or in contact with medical waste will be managed as medical waste. Untreated medical waste may be temporarily stored at the facility unrefrigerated for up to 72 hours after receipt at the facility. Untreated medical waste held longer than 72 hours after receipt at the facility will be stored at a temperature of 45 degrees Fahrenheit or less. Once treated in the autoclave unit(s), the steam sterilized waste will be placed in covered compactor, enclosed trailer, and/or covered container for temporary storage prior to transport and disposal at an approved landfill in accordance with 25 TAC §1.136 and 30 TAC §326.75(r). In the event the waste generator specifically requests a waste to be incinerated, the facility will accept, segregate for temporary storage, and transfer the waste off-site to an appropriately permitted facility.

The facility will also accept hazardous wastes in transit for temporary storage (less than or equal to 10 days).

4.3 Generated Waste [30 TAC §326.75(c)]

Describe how all liquids and solid waste resulting from the facility operations will be disposed of in a manner that will not cause surface water and groundwater pollution (attach additional pages to answer this question if necessary):

All liquids resulting from the facility operations will be generated inside the waste processing building with impervious concrete flooring and will be disposed of in a manner that will not cause surface water or groundwater pollution. Liquids generated during waste processing, washing, and routine cleaning will be controlled, collected, and either placed into the treatment unit or discharged to the sanitary sewer. Condensate from the autoclave system will also be discharged to the sanitary sewer system. Liquids generated at the facility can be properly managed without collection units (i.e. storage tanks and/or lined units). All necessary authorizations and approvals will be obtained and retained within the operating record at the site.

Solid wastes including treated medical waste generated by the facility are characterized as municipal solid waste. Municipal solid wastes generated by the facility can be adequately managed by MSW landfills permitted by the TCEQ. Treated waste will be stored in a covered compactor, enclosed trailer and/or covered container for temporary storage prior to transport to the landfill for disposal. Since waste will be stored under cover, contaminated water resulting from contact with untreated medical waste is not anticipated.

4.4 Access Control [30 TAC §326.75(g)]

Describe how public access to the facility will be controlled (attach additional pages to answer this question if necessary):

Public access to the facility will be controlled by artificial barriers. Fencing, locked gates, and buildings are used to control access to the facility. Access along the northern and western boundaries are controlled with a chainlink fence with barbed wire. The entrance to the facility along 110th Street (western boundary) is a locked sliding gate/swing gate combination. Access along the eastern boundary is provided by the building walls and a small section of chainlink fencing with barbed wire from the building to the fence on the northern boundary. The southern boundary of the facility that is shared with the adjoining property to the southwest, has a chainlink fence to control access. There is a steel gate between the facility and the adjoining property to the southwest. Building walls and lockable doors control access to the waste processing building where waste processing and storage occurs. Untreated waste may also be stored in enclosed, lockable transport vehicles. Transport vehicles and compactor/roll-off units storing treated waste are surrounded by fencing. The figures in Attachment 2 call out the fencing, entrance gate, and buildings referenced in this section.

Describe how access roads and parking areas will be maintained to control dust and prevent mud from being track off-site (attach additional pages to answer this question if necessary):

Dust and mud are not anticipated due to the access roads and on-site parking areas being paved. Public roads used by transport vehicles to access the facility are paved. Access roads

and parking areas within the facility are also paved. In the event there is a problem related to windblown dust, water will be used to control windblown dust. Within the facility, a standard garden hose connected to an on-site water source may be sufficient to apply water.

Access to the facility will be controlled by a perimeter fence, with lockable gates. Identify or describe the type of fence that will be installed at the facility:

☐ A four-foot-high barbed wire fence;

☒ A six-foot-high chain-link fence; or

☒ Other: building walls ~~wood fence~~.

4.5 Operating Hours [(30 TAC §326.75(i)]

Provide the operating hours of the facility; ***include justification for hours outside of 7:00 a.m. to 7:00 p.m., Monday through Friday***:

Waste acceptance and transfer hours for commercial waste transportation companies are 24 hours per day, seven days per week. Operating hours for waste processing units is 24 hours per day, seven days per week. The facility may conduct operations for maintenance and housekeeping, as needed, 24 hours per day, seven days per week.

The Daniels Arlington Facility may operate up to 24 hours a day 7 days a week. The ability to operate is critical for maintaining public health, environmental safety, and regulatory compliance. It ensures medical waste is promptly and properly managed, reducing health risks and supporting the uninterrupted and continuous generation of regulated medical waste. Therefor Daniels is requesting to operate up to 24 hours a day 7 days a week for the following reasons:
1. The continuous generation of regulated medical waste – medical waste is continuously generated and with 24/7 service / processing ability it helps manage storage volumes, contamination risks, and potential non-compliances.
2. Regulatory Compliance and Safety – Continuous processing minimize storage time and helps reduce odors, pests, and potential exposures.
3.Volume Mgt and Emergency Response – During pandemics or outbreaks the volume of medical waste can dramatically fluctuate. A 24/7 facility is better equipped to scale operates rapidly, manage fluctuations and ensure no backlog compromises compliance, safety, or customer service.
4. Operational Efficiency – Spreading process across 24 hours allow for better use of equipment and personnel, reducing peak load stress.

List the alternative operating hours, if any, of up to five days in a calendar-year period:

The need for alterative operating hours for special occasions, special purpose events, holidays, or other special occurrences is not anticipated.

PROCESS FLOW DIAGRAM AND NARRATIVE

§326.71(h)(4) Flow Diagram and Narrative

A flow diagram indicating the receipt, storage, and transfer sequences for the various types of wastes received is provided in this Attachment 6 of the application. A narrative of each phase is provided below.

Arrival of Waste at Facility: Medical waste is delivered by a TCEQ registered medical waste transporter to the medical waste management facility. Only those waste streams specified in this registration application will be unloaded. The unloading of prohibited wastes will not be allowed.

Visual Inspection and Manifest Review: Incoming waste and accompanying manifests/shipping documents will be visually inspected by employees trained to identify prohibited waste. Random visual inspections of packaging for incoming waste containers will be conducted a minimum of once per week to verify proper markings have been placed on all containers of waste.

Waste Accepted: The facility will accept medical waste as defined in §326.3(23), non-hazardous pharmaceuticals, trace chemotherapeutic waste, and confidential documents. §326.3(23) defines medical waste as treated and untreated special waste from health care-related facilities that is comprised of animal waste, bulk blood, bulk human blood, bulk human body fluids, microbiological waste, pathological waste, and sharps as those terms are defined in 25 TAC §1.132 (relating to Definitions). Hazardous waste in transit will also be accepted for temporary (≤10 day) storage in a designated area.

Reject / Return to Transporter: Any prohibited waste discovered prior to unloading will be rejected and returned promptly to the transporter or generator of the waste. In the event unauthorized materials are unloaded at the site, the material will be rejected, and the transporter will be required to immediately remove the waste along with any contaminated materials from the facility. Any undisclosed prohibited waste discovered after unloading will be isolated until the material can be adequately identified.

Waste Transfer: Waste may be transferred to another appropriately permitted/registered facility for treatment. Transfer of waste will occur at the loading/unloading docks or from truck to truck. In the event the waste generator specifically requests a waste to be incinerated, the facility will accept, segregate for temporary storage, and transfer the waste off-site to an appropriately permitted facility.

Temporary Storage of Untreated Waste: Untreated medical waste may be temporarily stored at the site unrefrigerated for up to 72 hours. Putrescible or biohazardous untreated medical waste held longer than 72 hours after being received at the facility will be stored at a temperature of 45 degrees Fahrenheit or less. Stand-alone refrigeration units or transport trucks/trailers with refrigeration units will be used to store untreated medical waste held longer than 72 hours after receipt at the facility.

Transfer Waste to Autoclave Bin: A cart tipper or manual means will safely transfer untreated waste from containers into autoclave bins for processing.

Waste Processing by Autoclave: Waste received at the facility (expect non-hazardous trace chemotherapeutic waste and pathological waste) will be treated by steam sterilization disinfection using autoclave unit(s) with associated boiler(s). This treatment technology is a Texas Department of State Health Services approved treatment technology. The process consists of placing the untreated waste in a pressure vessel/autoclave unit and forcing steam into the chamber and through the waste. When the waste is exposed to the proper temperatures for the approved time, the waste will be rendered sterilized. The parameters of time, temperature and pressure of the autoclave(s) used at this facility will meet or exceed those required by the Department of State Health Services requirements for steam disinfection found in 25 TAC §1.133(b)(4)(B). 25 TAC §1.133(b)(4)(B) states that when subjecting waste to steam under pressure, the temperature in the chamber of the autoclave must reach at least 121 degrees Celsius and there must be at least 15 pounds per square inch gauge pressure for at least 30 minutes. Autoclave bins loaded with untreated waste are rolled into the autoclave unit for treatment.

Temporary Storage of Treated Waste: Autoclave bins containing treated waste will be emptied into waste compactor, enclosed trailer, and/or covered~~open-top~~ container. Treated waste will be temporarily stored on-site and then transported off-site for disposal at a TCEQ approved municipal solid waste landfill.

Transport of Treated Waste to MSW Landfill: Treated waste will be transported to a TCEQ permitted landfill for disposal.

Empty Container Washing: The empty waste containers will be washed with pressurized water and detergent. Clean containers will be returned to generators for reuse.

Paper Shredding: Paper such as confidential documents will be shred with a paper shredder. Shredded paper may be baled recycled and/or disposed of at a municipal solid waste landfill.

Cardboard Baling: A cardboard baler may be used to compress and bale cardboard boxes. The baled cardboard may be recycled.

Temporary Storage of Hazardous Waste in Transit: Hazardous waste in transit will be temporarily stored in a designated area for 10 days or less. Proper notification (TCEQ Form 00002) will be submitted to TCEQ's Registration and Reporting Section for this activity.

true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fines an imprisonment for knowing violations."

§326.75(e)(4) Records Availability

All information contained in the operating record will be furnished upon request to the executive director and will be made available at all reasonable times for inspection by the executive director.

§326.75(e)(5) Records Retention

The owner or operator will retain all information contained within the operating record and the different plans required for the facility for the life of the facility.

§326.75(e)(6) Alternate Record Keeping Schedule

Alternate schedules for recordkeeping and notification stated above may be set by the executive director.

§326.75(e)(7) Shipping Document

When accepting delivery of untreated medical waste for which a shipping document/manifest is required, the owner or operator will ensure each of the following requirements is met:

(A) A shipping document accompanies the shipment, which designates the facility to receive the waste;

(B) The owner or operator signs the shipping document and immediately gives at least one copy of the signed shipping document to the transporter;

(C) The owner or operator retains one copy of the shipping document; and

(D) Within 45 days after the delivery, the owner or operator sends a written or electronic copy of the shipping document to the generator that includes the total weight of waste received and a statement that the waste was treated in accordance with 25 TAC §1.136 (relating to Approved Methods of Treatment and Disposition).

Copies of waste shipping documents will be maintained at the facility for three years. The shipping documents may be maintained in electronic format.

§326.75(f) FIRE PROTECTION

An adequate supply of water under pressure for firefighting purposes is available via fire hydrants located along E. Randol Mill Rd and 110th Street. Firefighting equipment such as fire extinguishers will be readily available at the facility. A Fire Protection Plan is included in Attachment 16 of this Application for a Medical Waste Registration.

§326.75(g) ACCESS CONTROL

§326.75(g)(1) Public Access Barriers

Public access to the facility will be controlled by artificial barriers appropriate to protect human health and safety and the environment. Fencing, locked gates, and buildings are used to control access to the facility. The northern and western boundaries have a six foot high chainlink fence topped with barbed wire. Along the boundary with the adjoining property to the southwest, there is also a six foot tall chainlink ~~wooden~~ fence. The facility has two locked gates. The entrance to the facility along 110th Street has a sliding gate/swing gate combination. There is a steel gate between the facility and the adjoining property to the southwest. Building walls, ~~and~~ lockable

doors, and a chainlink fence control access to the waste processing building where waste processing and storage occurs. The figures in Attachment 2 call out the fencing, entrance gate, and buildings referenced in this section.

§326.75(g)(2) Access Roads, Vehicle Parking, and Safety Measures

The facility will be accessed from publicly owned roads (E. Randol Mills Rd. and 110th Street). E. Randol Mills Rd. is concrete paved six-lane road (three-lane each direction) with grass median. At the entrance to the facility, 110th Street is asphalt paved two-lane road. There is adequate turning radii for the vehicles expected to access the facility. Within the facility, are concrete paved driving and parking areas. Vehicle parking is provided for equipment, transport vehicles, employee vehicles, and visitor vehicles. Safety bumpers will be provided at hoppers.

Dust and mud are not anticipated due to the access roads and on-site parking areas being paved. Public roads used by transport vehicles to access the facility are paved. Access roads and parking areas within the facility are also paved. In the event there is a problem related to windblown dust, water will be used to control windblown dust. Within the facility, a standard garden hose connected to an on-site water source may be sufficient to apply water.

§326.75(g)(3) Perimeter Fencing

Access to the facility is controlled by fencing, locked gates, and buildings. The northern and western boundaries have a six foot tall chainlink fence topped with barbed wire. Along the boundary with the adjoining property to the southwest is also a chianlink ~~, there is a wooden~~ fence. The facility has two locked gates. The entrance to the facility along 110th Street has a sliding gate/swing gate combination. There is a steel gate between the facility and the adjoining property to the southwest. Building walls, ~~and~~ lockable doors and a six foot tall chainlink fence control access along the eastern boundary of the facility. Transport vehicles and compactor/roll-off units storing treated waste are surrounded by fencing. An attendant will be onsite during operating hours.

§326.75(h) UNLOADING OF WASTE

§326.75(h)(1) Waste Unloading Area

The unloading of waste will be confined to as small an area as practical. A trained employee will monitor all incoming loads of waste to help prevent the receipt of prohibited waste and to direct the unloading of waste. The owner or operator is not required to accept any waste which they determine will cause or may cause problems in maintaining full and continuous compliance with applicable regulations. Signs may be used to indicate where vehicles are to unload.

§326.75(h)(2) Unauthorized Waste Unloading Areas

The unloading of waste in unauthorized areas will not be allowed. Vehicles will only be allowed to unload material within the processing area and dock area or transfer the material to another transport vehicle/trailer. Any waste deposited in an unauthorized area will be removed immediately and managed properly.

§326.75(h)(3) Prohibited Wastes

Only those waste streams specified in this registration application will be unloaded. The unloading of prohibited wastes will not be allowed. Incoming waste will be inspected by a trained employee. Any prohibited waste discovered prior to unloading will be rejected and returned promptly to the transporter or generator of the waste.