

**MUNICIPAL SOLID WASTE FACILITY
TYPE V PERMIT MODIFICATION
NUMBER 2069**

WASTE ACCEPTANCE AND ANALYSIS PROCEDURES

for

LIQUID ENVIRONMENTAL SOLUTIONS OF TEXAS, LLC

**Dallas Facility
11115 Goodnight Lane
Dallas, Texas, 75229**

**CN No. 601540404
RN No. 103002713**

Prepared by:

**Liquid Environmental Solutions of Texas, LLC
1801 Royal Lane, Suite 500
Dallas, Texas 75229**

and

**Brown and Caldwell
1100 NE Loop 410, Suite 300
San Antonio, TX 78209**

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A. Introduction

The Liquid Environmental Solutions of Texas, LLC (LES) Dallas facility, located at 11115 Goodnight Lane in Dallas, Dallas County, Texas, is permitted pursuant to the Texas Commission on Environmental Quality (TCEQ) Municipal Solid Waste (MSW) Section to process grease trap/food-related wastes and grit trap wastes as described in the facility Waste Acceptance and Analysis Plan. This document provides more detail regarding specific acceptance and analysis procedures for both waste categories.

B. Waste Acceptance Procedures

1. Grease Trap and Food-Related Wastes

When a load of grease trap/food-related material arrives at the site, it must be accompanied by the appropriate manifest or trip ticket. An LES Operator questions the transporter about the type and characteristics of material to be offloaded. The use of an appropriate manifest/trip ticket and the transporter/pumper's knowledge regarding the grease trap material, are sufficient to satisfy acceptance requirements. Because food establishments do not generally use hazardous constituents when processing or manufacturing foods for consumption, grease trap and food-related wastes are typically not subjected to pre-approval profiling and sampling prior to acceptance.

2. Municipal Grit Trap Wastes

Prior approval is required before grit trap waste is accepted at the facility. In order to be approved, the waste must be profiled and laboratory analysis is required in the profile. A copy of the Generator Liquid Profile Sheet (GLPS) is included in Appendix 1. The following sequence of events will be used to accept this waste:

- a. For new waste streams, new clients or the annual review of the waste stream, a GLPS must be submitted along with a representative sample for pre-approval analysis. Municipal grit trap waste generators must also submit a copy of their most recent analysis (<1 year old) for evaluation.
- b. When the waste has been approved for acceptance, vacuum trucks will be authorized to submit waste to the Facility.
- c. Drivers will check in at the office with a trip ticket/manifest
- d. LES personnel will compare trip ticket/manifest information to waste profile information for consistency.

- e. If trip ticket/manifest information does not significantly vary from the information on the waste profile, a waste sample will be taken from the truck and analyzed.
- f. If a waste exhibits a pH of less than 2.0 or greater than 12.5 units (<2.0 or >12.5), it will not be accepted. If a load is rejected for any other reason, the generator will be contacted and, with generator approval, paperwork for further analysis will be prepared. If the load is subsequently accepted, the customer will be notified of any additional processing charges before it is unloaded. If a load is rejected, the driver will be instructed to leave the facility and transport the waste to a location determined by the generator.
- g. If a load is accepted, the driver will be forwarded to an off-load operator who will direct the driver to the appropriate receiving location.
- h. Results on in-bound shipment analysis will be recorded on the Daily Receiving Report, which is kept in the Facility office for a minimum of three years.

3. Rejected Wastes

Rejected wastes will not be accepted, and therefore not offloaded at the facility (TAC 330.203, TAC 330.225).

C. Waste Analysis Procedures

Grit trap wastes will be subjected to various waste analysis procedures consisting of waste profile pre-approval analysis (i.e., analysis conducted before the waste is delivered to the Facility) and screening analysis at the Facility.

1. Waste Profile Pre-Approval Analysis and Generally Acceptable Limits

Table 1 identifies the waste profile pre-approval analysis and the generally acceptable limits:

ANALYSIS	LIMIT
Administrative	Waste Profile is complete, recent (<1 year old) independent laboratory analysis is complete
pH	Between (and not including) 2.0 and 12.5 pH units
COD	<15,000 mg/L
Flame Test	Positive or Negative, if positive note color
Flash Point	Greater than or equal to 140°F (≥140°F)

Total Halogens	Less than 1,000 ppm
Toxicity	Below TCLP regulatory levels indicated in 30 TAC 335.521 (a) (1) and 40 CFR 261.24 (b) Table 1
Physical Appearance	Consistent with waste type

Table 1: Waste Profile Pre-Approval Analysis – Generally Acceptable Limits

Under no circumstances will a waste that fails the stated criteria in Table 1 for pH, flash point, and/or toxicity be accepted for processing by the Facility.

Generators wishing to dispose of petroleum-contaminated wastes with total halogen concentrations of greater than or equal to 1,000 ppm ($\geq 1,000$ ppm) at this facility must demonstrate that the wastes are not hazardous in accordance with 40 CFR 279.10(b)(1)(ii). Such a demonstration will require that the generator analyze the waste through an independent environmental laboratory for hazardous compounds listed in 40 CFR Part 261, Subpart D and for polychlorinated biphenyl (PCB) wastes as defined in 40 CFR 761. Per 40 CFR 761, PCB concentrations in waste materials that are less than 50 ppm are generally not considered to be PCB wastes.

2. Screening Analysis and Generally Acceptable Limits

When grit trap wastes arrive on site, samples are analyzed to ensure that the pH is within the range indicated in Table 1 and that the physical appearance of the waste is consistent with both the waste type and the waste profile. The trip ticket must also be complete and consistent with the current waste profile.

Under no circumstances will a waste with a pH of less than or equal to 2.0 or greater than or equal to 12.5 pH units (≤ 2.0 or ≥ 12.5) be accepted for processing by the Facility. Loads that do not conform to physical appearance expectations or that lack a completed trip ticket will also be rejected.

When loads are rejected, the generator will be notified of applicable alternatives. The generator will have the option of allowing an off-site laboratory selected by LES to analyze the load for parameters for hazardous waste characterization, having the load returned to the generator, or having the load delivered to an alternative processing or disposal facility. If additional characterization is performed and the analytical results for the sample are within acceptable ranges for the Facility, the waste will be accepted for processing. If the analytical results for the waste are outside the acceptable ranges, the generator will determine if the waste is to be returned to their facility or transported to an alternative processing facility.

In accordance with 30 TAC 330.203 (c), wastes received by the facility must be analyzed at least annually for benzene, lead, and total petroleum hydrocarbons

(TPH). Grit trap wastes must also be analyzed at least annually for biochemical oxygen demand (BOD) and total suspended solids (TSS).

D. Sample Collection Procedures

LES will collect samples of the waste presented for processing for testing prior to acceptance.

E. Waste Analytical Methods

All waste analyses must be conducted in accordance with EPA-approved methods in order to be accepted by the facility. Such analyses include all testing of wastes reported on the waste profile as well as waste acceptance analyses.

F. LES Quality Assurance and Quality Control (QA/QC) Program Overview

1. Purpose

The purpose of the QA/QC program is to ensure that all data is scientifically valid and of known precision and accuracy.

2. Analytical Performance Evaluation

On an annual basis, samples will be collected from two truck loads of grit trap waste. These samples will be analyzed by both an independent laboratory and by facility staff for any constituents other than pH measured by facility staff. Results of the split sampling will be compared. If substantial deviations in analytical results are observed, additional sampling will be conducted and/or corrective measures will be implemented as appropriate. To ensure quality pH measurements, all pH instruments will be calibrated in accordance with manufacturer's instructions at least daily prior to use.

3. Reagent/Standard Preparation

All reagents and standards will be obtained commercially prepared. Only reagents and standards that are within expiration dates will be used by the laboratory. All reagents and standards that have expired will be removed from the laboratory and properly disposed of.

4. Decontamination

All equipment that is reused will be decontaminated. Decontamination consists of washing equipment with soap and rinsing with distilled water. When possible, single use, disposable equipment, will be used. Clean equipment will be protected from potential contamination.

5. Audits and Corrective Action

Audits of analytical procedures performed by facility personnel will be conducted at least annually. At least semiannually, sample collection practices will be evaluated for each applicable employee to ensure they are collecting and handling samples in accordance with standard laboratory practices. All review and audit findings and corrective actions will be documented and maintained in the office at the Facility.

G. Record Retention

LES will retain all waste analysis results and records as part of the operating record. Operating records will be retained at the Facility for not less than three (3) years.

H. Emergency Preparedness and Spill Contingency Summary

A separate Employee/Fire Action Plan has been prepared for the facility. Training records for this plan are kept with the employee files at the Corporate office for the life of the site, along with other employee training records for topics such as spill prevention and site safety.

The City of Dallas Fire Department and Hazardous Chemical Response emergency telephone number is 911.

APPENDICES

APPENDIX 1

Generator Liquid Profile Sheet