

Original Application – June 1, 1987

Major Document Reorganization – August 24, 2009

**TYPE V MUNICIPAL SOLID WASTE FACILITY
TCEQ MSW PERMIT 2069**

**PART IV
SITE OPERATING PLAN**

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**

**TBPE Reg. #F-2139
August 24, 2009**

**Part IV (Site Operating Plan)
TYPE V PERMIT APPLICATION**

Table of Contents

1.	Introduction.....	1
2.	Personnel.....	3
3.	Equipment	4
4.	Facility Inspections and Maintenance.....	4
5.	Training Requirements	4
6.	Waste Acceptance and Analysis (330.203).....	5
7.	Facility-Generated Wastes (330.205)	6
8.	Contaminated Water Management (330.207)	7
9.	Storage Requirements (330.209).....	7
10.	Approved Containers (330.211).....	7
11.	Citizen’s Collection Stations (330.213).....	8
12.	Requirements for Stationary Compactors (330.215).....	8
13.	Pre-Operation Notice (330.217)	8
14.	Recordkeeping and Reporting Requirements (330.219)	8
15.	Fire Protection (330.221)	9
16.	Access Control (330.223)	10
17.	Unloading of Waste (330.225)	11
18.	Spill Prevention and Control (330.227).....	11
19.	Facility Operating Hours (330.229).....	11
20.	Facility Sign (330.231)	11
21.	Control of Windblown Material and Litter (330.233).....	12
22.	Materials along the Route to the Facility (330.235).....	12
23.	Facility Access Roads (330.237)	12
24.	Noise Pollution and Visual Screening (330.239).....	12
25.	Overloading and Breakdown (330.241)	13
26.	Sanitation (330.243)	13
27.	Ventilation and Air Pollution Control (330.245).....	14
28.	Health and Safety (330.247)	14
29.	Employee Sanitation Facilities (330.249)	14
30.	Disease Vector Control.....	15

Tables

- SOP-1 Revision History for MSW Permit No. 2069**
- SOP-2 Job Descriptions**
- SOP-3 Inspection and Maintenance Checklist**
- SOP-4 Sludge Characterization Standards**

1. INTRODUCTION

Liquid Environmental Solutions of Texas, LLC (LES) is in the business of processing certain non-hazardous liquid wastes. The LES Dallas Facility processes grease trap/food-related and grit trap waste streams. The facility is designed to separate and process the waste streams received into recyclable components, water suitable for discharge into the sanitary sewer system and solid materials for appropriate disposal. The acceptance and processing of these wastes requires a Type V Municipal Solid Waste (MSW) permit.

The purpose of this major permit amendment is to increase the monthly grease trap/food-related waste permitted capacity from 2.4 million gallons per month to 4.8 million gallons per month. This amendment request is supported by an engineering evaluation of the grease trap treatment facility capacity performed by Brown and Caldwell. A Technical Memorandum describing this evaluation is included as Attachment SDP-1 to the Site Development Plan. LES is also requesting the following amendments to the permit:

- Addition of a second shaker screen to the grease trap treatment process. This additional shaker screen will facilitate the requested grease trap/food-related waste receipts increase.
- Addition of a grinder pump with a capacity up to 350 gpm to facilitate the processing of grease trap and food-related wastes with large solids or high solids content. This improvement is planned for the future and LES proposes to notify the Texas Commission on Environmental Quality (TCEQ) prior to placing a grinder pump in service.
- Removal of special provisions that have historically been associated with this permit. These permit documents have been prepared to address all applicable regulatory requirements.
- Addition of authorization to accept food-related wastes which are Class 2 industrial solid wastes. LES has determined that these wastes, which include solids-laden liquid wastes from food manufacturing facilities, can be effectively processed through the existing LES treatment system.

The original MSW permit application for Permit 2069, currently owned and operated by LES, was submitted on June 1, 1987. Since that time, there have been a total of fourteen revisions to the permit documents which constitute the permit, as indicated in the following Table SOP-1. The Site Operating Plan (SOP) underwent a major reorganization in the November 27, 2006 revision to comply with extensive new regulatory requirements.

Date	Site Development Plan (SDP)	Site Operating Plan (SOP)	Waste Acceptance and Analysis Plan (WAAP)	Permit Edition
6/1/1987	Original	-	-	Original
3/30/1988	Revision 1	-	-	Revision 1
3/19/1989	Revision 2	-	-	Revision 2
May 1991	-	Original (Old)	-	Revision 3
September 1991	-	Revision 1	-	Revision 4
5/18/1999	Revision 3	-	-	Revision 5
8/24/2003	Revision 4	Revision 2	Original	Revision 6 ^A
2/2/2004	Revision 5	Revision 3	Revision 1	Revision 7
6/25/2004	Revision 6	Revision 4	Revision 2	Revision 8
2/1/2005	Revision 7	Revision 5	-	Revision 9
4/5/2005	Revision 8	Revision 6	-	Revision 10
8/5/2005	Revision 9	Revision 7	-	Revision 11
11/27/2006	-	Original (New)	-	Revision 12
6/8/2007	-	Revision 1	-	Revision 13
5/30/2008	Revision 10	Revision 2	Revision 3	Revision 14

Notes:

A. Date for SDP is 8/24/2003, date for SOP and WAAP is 8/25/2003.

Table SOP-1: Revision history for MSW Permit No. 2069.

This permit document submittal represents a major reorganization of the previous permit documents. The documents have been reorganized to better align with the corresponding regulatory requirements. Where applicable, regulatory citations are noted. With the concurrence of the TCEQ, these documents are being submitted as clean copies without markups.

This SOP contains information about how LES will conduct operations at its Dallas, Texas facility. The SOP represents the general instruction for facility management and personnel to operate the facility in a manner consistent with the approved design and the regulatory requirements to protect human health and the environment and prevent nuisances.

The SOP is Part IV of the MSW permit/registration application and consists of the information required by Title 30, Texas Administrative Code (TAC), Chapter 330, Subchapter E: Operational Standards for Municipal Solid Waste Storage and Processing Units, 30 TAC §330.201–§330.249. At a minimum, the SOP must include provisions for facility management and operating personnel to meet the general and site-specific requirements of these rules. The sections in the SOP are organized by regulatory citation in 30 TAC 330 Subchapter E. Additional requirements pertaining to Personnel, Equipment, Facility Inspections and Maintenance, Training Requirements, and Disease

Vector Control are also included, as specified by the TCEQ and as provided in the agency’s Part IV Site Operating Plan Template for Transfer Stations.

2. PERSONNEL

Job descriptions for this facility are presented in Table SOP-2. The Plant Manager, Operations Supervisor and/or Operator-In-Charge will be responsible for operating this facility in compliance with the permit and the applicable regulations. The Plant Manager, Operations Supervisor and/or Operator-In-Charge will designate a person identified in Table SOP-2 to act for him during his absence. The designee will have the same training including certification as the Plant Manager, Operations Supervisor and/or Operator-In-Charge.

Position	Minimum Number	Training	Responsibilities
Plant Manager/Supervisor Operations Supervisor and/or Operator-In-Charge	1	Shall receive instruction in basic solid waste management practices and Texas MSW regulations. Must hold and maintain MSW Class B License (30 TAC 30, Subchapters A and F)	The primary function is to hire, train and supervise plant, laboratory, and administrative employees at the facility who operate safely and in compliance at all times. The Plant Manger is responsible for profitability, maintaining equipment, tracking chemical inventory, following the SOP as established, and maintaining permits and licenses.
Wastewater Treatment Operator	1	6 months minimum experience in equipment operation or on-the-job training by supervisor. Training to include recognition of facility prohibited wastes.	The primary functions are to treat wastewater, determine water quality, and drain treated effluent into the sewer. Must manage chemical addition and verify capacity in the system to route material into the treatment system.

Table SOP-2: Job Descriptions

Facility personnel receive initial pre-assignment, ongoing, and refresher training based on position. In addition, in accordance with 30 TAC Chapter 30 Subchapters A and F, the Plant Manager, Operations Supervisor and/or Operator-In-Charge shall receive instruction in basic solid waste management practices and Texas MSW regulations and

must qualify to receive and possess an MSW Class B License issued by the State of Texas. The solid waste license shall be renewed as specified by the issuing authority.

More detailed job descriptions along with written descriptions of the type and amount of introductory and continued training provided to each employee will be maintained in the facility operating record.

3. EQUIPMENT

Tables SDP-2, SDP-3, and SDP-4 in the Site Development Plan include a listing of storage units, processing units, and major ancillary equipment routinely used at the facility. The general type, minimum number, typical size, and functions of the equipment are also included. LES may supplement this basic equipment with other similar equipment as needed to operate the facility in the event of a failure or breakdown of existing equipment, to improve operational efficiency, or to meet special needs. The TCEQ will be consulted if new equipment may require an amendment to the facility permit.

4. FACILITY INSPECTIONS AND MAINTENANCE

Table SOP-3 contains the facility inspection and maintenance list for the facility. The facility supervisor or a designee will perform the task. The inspection documentation will be retained in the operating record.

ITEM	TASK	Frequency
Fence/Gates (Section 16)	Inspect perimeter fence and gates for damage. Make repairs if necessary.	Weekly
Windblown Waste (Section 21)	Check working area, access roads, entrance areas, and perimeter fence for loose trash. Clean up as necessary.	Daily
Facility Access Road (Section 23)	Inspect facility access road for damage from vehicle traffic, erosion, or excessive mud accumulation. Maintain as needed.	Daily
Facility Signs (Section 20)	Inspect all facility signs for damage, general location, and accuracy of posted information.	Weekly
Odor (Section 27)	Inspect the perimeter of the facility to assess the performance of facility operations to control odor.	Daily

Table SOP-3: Inspection and Maintenance Checklist

5. TRAINING REQUIREMENTS

The owner or operator will ensure that the Plant Manager, Operations Supervisor and/or Operator-In-Charge, subsequently referred to as manager/supervisor, is/are knowledgeable in the proper operation of a municipal solid waste facility and the current operational standards required by the TCEQ. The manager/supervisor will be

experienced and will maintain a facility supervisor license as specified in 30 TAC 30 Subchapters A and F. The manager/supervisor will ensure that all personnel are properly trained and are operating the facility in accordance with this SOP and operational standards required by the facility's permit and the TCEQ municipal solid waste regulations.

New employees in positions related to MSW operations or management will successfully complete an orientation training program of classroom instruction and on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with MSW permit regulations and the facility permit, including this SOP. Information necessary to protect the health and welfare of the employee will be provided and communicated. The training program will provide a written description of the type and amount of both introductory and continuing training that will be given to each person at the facility. This program will be directed by a person trained in waste management procedures, and will include instruction that teaches facility personnel waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. At a minimum, the training program will be designed to ensure that facility operations personnel are able to screen inbound waste and respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- recognizing and/or using communications or alarm systems;
- responding to fires or explosions;
- responding to ground-water contamination incidents; and
- performing shut down operations.

The facility's personnel training files are maintained electronically. Training records are available for review upon request.

Facility personnel will take part in an annual review of their initial training. A written description of the type and amount of introductory and continued training provided to each employee will be maintained in the facility operating record.

6. WASTE ACCEPTANCE AND ANALYSIS (330.203)

Waste acceptance and analysis procedures are described in the Waste Acceptance and Analysis Plan (WAAP) (Attachment II-1 to Part II of the permit documents). All of the requirements specified in 30 TAC 330.203 are addressed in the WAAP. With this amendment, LES is requesting an increase in permitted monthly grease trap/food-related waste processing from 2.4 million gallons to 4.8 million gallons. LES processes a maximum of 600,000 gallons per month of grit trap waste.

7. FACILITY-GENERATED WASTES (330.205)

The wastes and recyclable products generated at this facility will include pretreated water, solids/sludges, and recovered oils and greases. After treatment, these wastes and recyclable products leave the facility as indicated below for further treatment, disposal, and/or re-use.

- Wastewater - pre-treated wastewater (which includes the treated water separated from the incoming grease trap/food-related and grit/lint wastes) will be discharged into the City of Dallas sanitary sewer system pursuant to the facility's industrial user wastewater discharge permit. The City of Dallas permit to discharge is renewed every five years and includes limits for constituents regulated under the Clean Water Act and EPA's Centralized Waste Treatment (CWT) Rule at 40 CFR Part 437. In addition to the constituents listed in the discharge permit, facility effluent must be analyzed annually for Total Petroleum Hydrocarbons (TPH), fats, oil, and grease, and pH in accordance with 30 TAC 330.203(c). The facility's average daily flow rate is not currently limited in the permit.
- Solids/sludges - solid waste may be disposed in a TCEQ permitted sanitary landfill or transported to a permitted beneficial re-use facility. Beneficial re-use includes composting, use as a fuel source for cement kilns, bunker fuel, or other alternative fuel, or other similar beneficial uses. LES will ensure that solid wastes meet the acceptance requirements of the selected off-site receiving facility prior to leaving the site.
- Oils and Greases - recovered oils and greases will be sent only to other facilities licensed or permitted by appropriate agencies to receive such materials. Recovered oil and grease is generally transported for beneficial re-use such as recycling, use as alternate fuel, or anaerobic digestion. Oily water is transported to a permitted disposal or processing facility.

Sludges produced on site that may be disposed of at a municipal solid waste landfill must meet associated disposal requirements. These sludges must pass the Paint Filter Liquids Test, United States Environmental Protection Agency (EPA) Method 9095 as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Publication Number SW-846, September 1986 or later editions). Additionally, sludges to be disposed of at a municipal solid waste landfill must not exceed the standards indicated in Table SOP-4. In accordance with 30 TAC 330.203 (c), sludges disposed of at municipal solid waste landfills must be analyzed for these constituents annually. Sludges exceeding these limits may not be transported to a municipal solid waste landfill for disposal.

Contaminant	Total Limit	TCLP Limit
Benzene	10 milligrams per kilogram (mg/kg)	0.5 milligrams per liter (mg/L)
Lead	30 mg/kg	1.5 mg/L
Total petroleum hydrocarbons (TPH)	1,500 mg/kg	not applicable

Table SOP-4: Sludge Characterization Standards**8. CONTAMINATED WATER MANAGEMENT (330.207)**

Surface drainage in and around the facility is controlled to minimize surface water running onto, into, and off of the process areas. As described in Section 10 of the SDP, the facility is covered under the multi-sector general permit for industrial stormwater discharges but does not normally discharge stormwater associated with industrial activity. Water that has the potential to become impacted by process operations is collected within bermed process areas or hydraulically-separated drainage areas. Potentially contaminated stormwater is normally either directly treated along with process wastewaters in the facility's wastewater treatment system and then discharged to the sanitary sewer in accordance with the City of Dallas industrial user discharge permit or transferred to storage tanks prior to treatment. All potentially contaminated water is thus normally pre-treated on site and routed to the City sewer system for additional treatment, with the exception of oily wastewater which is transported off-site for additional processing at an authorized facility. The City discharge permit prohibits discharges which interfere with or pass-through either the treatment facility processes and operations or the sludge processes, use, and disposal. Discharges must comply with Chapter 49 of the Dallas City Code and 40 CFR 403. Additionally, oil and grease concentrations of treated effluent must not exceed the limits established in the City of Dallas discharge permit.

9. STORAGE REQUIREMENTS (330.209)

Most liquid wastes and recovered materials are stored in fixed-roof vented tanks. As described in Section 26, process areas are washed daily. The use of fixed-roof tanks and frequent washing of process areas reduce the attraction of vectors.

10. APPROVED CONTAINERS (330.211)

All solid waste containing food wastes are stored in fixed-roof, vented tanks that are leak proof, durable, and designed for safe handling and easy cleaning. Reusable containers are maintained in a clean condition so that they do not constitute a nuisance and to retard the harborage, feeding, and propagation of vectors. All containers to be emptied manually are capable of being serviced without the collector coming into physical contact with the solid waste. Containers to be mechanically handled are designed to prevent spillage or leakage during storage, handling, or transport. The facility does not use non-reusable containers.

11. CITIZEN’S COLLECTION STATIONS (330.213)

Citizen’s collection stations are not applicable since this facility does not provide waste services to the general public.

12. REQUIREMENTS FOR STATIONARY COMPACTORS (330.215)

This facility does not use stationary compactors.

13. PRE-OPERATION NOTICE (330.217)

These requirements do not apply to this Type V MSW liquid waste processing facility.

14. RECORDKEEPING AND REPORTING REQUIREMENTS (330.219)

Personnel operator licenses issued in accordance with 30 TAC Chapter 30, Subchapter F (Municipal Solid Waste Facility Supervisors), will be maintained as required.

In accordance with 30 TAC 330.219, a copy of the permit documents and other required plans or related documents shall be maintained at the facility. As-built construction plans and specifications shall also be maintained at the facility. These documents shall be considered a part of the operating record for the facility.

The facility shall promptly record and retain in the operating record the following information within seven (7) working days of completion or receipt of analytical data related to them:

- all location-restriction demonstrations;
- inspection records and training procedures;
- closure plans and any monitoring, testing, or analytical data relating to closure requirements;
- all cost estimates and financial assurance documentation relating to financial assurance for closure;
- copies of all correspondence and responses relating to the operation of the facility, modifications to the permit, approvals, and other matters pertaining to technical assistance;
- all documents, manifests, shipping documents, trip tickets, etc., involving special waste;
- any other document(s) as specified by the approved authorization or by the executive director; and
- record retention provisions for trip tickets as required by 30 TAC 312.145 (relating to Transporters - Record Keeping).

Other written records as specified in this SOP will be maintained as part of the operating record for the facility. The facility shall retain all information contained within the operating record and the different required plans for the life of the facility. The executive

director may set alternative schedules for recordkeeping and notification requirements as specified in subsections 30 TAC 330.219 (a) - (e). All information contained in the operating record shall be furnished upon request to the Executive Director and shall be made available at all reasonable times for inspection by the Executive Director or authorized agency representatives.

For signatories to reports, the following conditions apply:

- All reports and other information requested by the executive director as described in 30 TAC 305.44(a) shall be signed by the owner or operator or by a duly authorized representative of the owner or operator. A person is a duly authorized representative only if:
 1. The authorization is made in writing by the owner or operator as described in 30 TAC 305.44(a);
 2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity or for environmental matters for the owner or operator, such as the position of plant manager, environmental manager, or a position of equivalent responsibility. A duly authorized representative may thus be either a named individual or any individual occupying a named position; and
 3. The written authorization is submitted to the executive director.
- If an authorization under this section is no longer accurate because of a change in individuals or position, a new authorization satisfying the requirements of this section must be submitted to the executive director prior to, or together with, any reports, information, or applications to be signed by an authorized representative.
- Any person signing a report shall make the certification in 30 TAC 305.44(b).

The facility will maintain records to document the annual waste acceptance rate for the facility. Documentation must include maintaining the quarterly municipal solid waste summary reports and the annual municipal solid waste summary reports required by 30 TAC §330.675 in the operating record.

In accordance with 30 TAC 330.203 (c), required analytical data records as described in the WAAP and in this document are maintained at the facility for a minimum of three years.

15. FIRE PROTECTION (330.221)

The facility is located within the jurisdiction of the City of Dallas Fire Department. The facility is served by a 911 emergency response system that coordinates fire department, police, and medical emergency calls for minimum response time. Fire hydrants are located on Goodnight Lane.

While the wastes handled by the facility, grit trap and grease trap wastes, do not typically pose fire hazards, operators and facility staff stay alert for signs of fire such as smoke, steam, or excessive heat. Equipment is regularly cleaned to remove combustible waste and caked material which can cause overheating and increase fire potential. Smoking is not permitted near waste management areas.

Fire extinguishers are visually inspected monthly and the inspection/maintenance will be completed by a State licensed fire protection contractor. The facility shall notify the appropriate TCEQ Regional office in the case that a fire cannot be extinguished within 10 minutes of detection.

The emergency action plan in the event of a fire is:

- The facility operator in charge will see to the immediate safety of personnel.
- Call 911 and report the fire. Phones are located in the office building.
- If the fire is small and localized, use one or more of the fire extinguishers to control the spread of the fire.

ABC type fire extinguishers are located on-site; all employees will be trained in fire extinguisher safety and the employee emergency action plan for emergency evacuation procedures.

16. ACCESS CONTROL (330.223)

To protect human health, safety and the environment, the site is enclosed by a minimum six-foot-high fence with lockable gates, as described in Section 2 of the Site Development Plan. The fence shall be inspected on a weekly basis as part of the internal Environmental, Health, and Safety audit as indicated in Table SOP-3 in Section 4. If an access breach is permanently repaired within eight hours of discovery, the breach will be noted in the facility operating record but no further actions will be required. Otherwise, the following actions must occur if the breach can not be permanently repaired within eight hours:

1. The facility must notify the TCEQ regional office within 24 hours of the breach and of a repair schedule;
2. The facility must make temporary repairs within 24 hours;
3. The facility must make permanent repairs within the schedule provided to the TCEQ regional office;
4. The facility must notify the TCEQ regional office that the repair has been completed within the schedule provided; and
5. The facility must document the breach and corresponding actions in the facility operating record.

Permanent repairs consist of replacing damaged pickets or sections. T-stakes can be used as a temporary repair to fence poles until permanent repairs are completed within the committed schedule.

Public and facility access roads are paved, all-weather roads. There is one authorized entrance onto the site. All truck traffic must proceed directly to the facility office receiving area. Only vehicles authorized by the manager/supervisor, personal vehicles of employees, and authorized haul vehicles have access beyond the facility entrance and its adjacent parking lot. All inbound and outbound traffic is closely monitored by facility personnel. Signage is posted to notify all visitors to check in at the office. High wattage phosphorescent lights illuminate the unloading and processing areas at night. The entrance/exit gate is secured when the facility is not operational.

17. UNLOADING OF WASTE (330.225)

Offloading occurs in the Offloading Area and in the Process Building, both of which are indicated in the facility map included as Attachment II-2 to Part II of the application. Specific waste acceptance procedures are described in Attachment I to the WAAP. As described in these procedures, an LES employee is always present to ensure that wastes are offloaded to the desired storage vessel or processing unit. LES employees are present at any time waste is offloaded and will not allow offloading of wastes in unauthorized areas or offloading of prohibited wastes, as described in the WAAP. When facility staff are not present, access gates are locked to prevent unauthorized entry.

18. SPILL PREVENTION AND CONTROL (330.227)

Spill prevention and control features of the facility are described in Section 13 of the SDP.

19. FACILITY OPERATING HOURS (330.229)

The facility is permitted to operate 7 days per week, 24 hours per day. Normal waste acceptance occurs between 5:00 a.m. and 7:00 p.m., Monday through Friday, with additional receiving hours by appointment only. However, the facility routinely operates 7 days per week, 24 hours per day. Waste acceptance hours are posted at the site entrance as described in Section 20.

20. FACILITY SIGN (330.231)

The entrance to the site through which wastes are received conspicuously displays a sign measuring at least 4 feet by 4 feet with letters at least 3 inches in height stating the name of the facility, type of disposal site, the hours and days of operation, a 24 hour emergency phone number to contact a supervisor/manager with the authority to obligate the facility after hours, local emergency fire department phone number, and the MSW permit number. The general condition of these signs is checked weekly in accordance with Table SOP-3 in Section 4.

21. CONTROL OF WINDBLOWN MATERIAL AND LITTER (330.233)

The liquid and sludge wastes processed by the facility are not of the type to be blown by the wind. The entire processing area is enclosed by a minimum 6-foot fence. Operations personnel will collect windblown material daily from inside and outside the facility and dispose of it properly in accordance with Table SOP-3.

22. MATERIALS ALONG THE ROUTE TO THE FACILITY (330.235)

The facility shall provide spill response training to all LES employees that operate Company owned or leased enclosed vessel (tank) vehicles. LES will assume cleanup responsibilities for releases from their vehicles.

In accordance with State permit requirements, waste haulers are responsible for spills and leaks from their vehicles. In the event a leaking vehicle arrives at the facility, the hauler will be notified and will be responsible for clean up activities along the route to the facility. Should a third party independent transporter cause a vehicle to operate in a manner inconsistent with Federal and State transporter regulations with respect to leaking vehicles, LES will take steps to report the independent third party transporter(s) to the TCEQ and or local law enforcement as applicable.

All clean up activities along and within the right-of-way of public access roads serving the site shall be coordinated with local authorities and the Texas Department of Transportation prior to commencement of any clean up operations.

23. FACILITY ACCESS ROADS (330.237)

All access roads leading into the site are concrete or asphalt paved. The facility does not have any interior roads, although vehicles drive and park in the offload area and/or inside the process building. Both the offload area and the floor of the process building are concrete construction which minimize tracking of mud and trash onto public roadways. Mud tracking and dust is not an issue at this site because of the concrete surface of all process areas and paving of all access roads.

The access roads, offload area, and parking lots are maintained as needed to minimize depressions, ruts or potholes.

24. NOISE POLLUTION AND VISUAL SCREENING (330.239)

The facility processing area is screened on all sides and from public view along Goodnight with fencing. The site office and laboratory building provides an effective visual barrier between the operations areas and the public roadway.

Noise generated by the facility is primarily the result of the operations of pumps, the filter press, and vacuum trucks. No excessively loud devices are used at the facility. Adequate distances to neighboring properties and the absence of residences in the immediate

vicinity have yielded no problems arising from noise. Additionally, most facility operations are performed behind fencing and inside buildings, which provide adequate barrier to noise pollution at the facility.

25. OVERLOADING AND BREAKDOWN (330.241)

Incoming solid waste will not be accumulated in quantities that cannot be processed within 72 hours. Grease trap/food-related wastes and processed materials are stored in fixed-roof vented tanks to reduce odors and prevent insect breeding and harboring of other vectors. Receipt of additional wastes beyond those that can be processed within 72 hours will be curtailed until any adverse conditions are abated. As a safeguard against overloading, the size of each load received into the facility is entered into a tracking program. Depending on several factors such as variations in the waste matrix, temperature, etc., the average processing time will range from 1½ hours up to 4 hours. LES waste acceptance has systems to protect the facility from overloading, such as load/gallon tracking software, continuous and efficient waste processing, and excess tank storage capacity.

If a significant work stoppage or slowdown occurs for any reason, the facility will accordingly restrict the receipt of waste and divert loads to another approved processing or disposal facility. If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harboring of other vectors, steps will be taken to remove accumulated solid waste from the site to an approved backup processing or disposal facility.

If a processing upset or major breakdown occurs that can be remedied in 72 hours, additional wastes will be received only to the capacities of the unloading pits and tanks. If the upset or breakdown period is anticipated to last longer than 72 hours, onsite wastes will be transferred for processing and disposal to another approved facility. LES-operated vacuum trucks or authorized third party transporters shall pump all unprocessed or partially processed materials from tanks, pits, vessels, and basins and haul to authorized disposal or processing facilities. Processed wastes will be disposed of as described in Section 7.

26. SANITATION (330.243)

Working surfaces to which employees are regularly exposed and which come into contact with wastes will be washed down on a daily basis. Processing floors and slabs will be washed down at a minimum twice weekly. Wash waters will be removed and pumped to waste management units for proper treatment.

Floor sumps are provided to facilitate collection of wash-down waters. Wash down waters thus collected will be pre-treated by the facility through the wastewater treatment system used for grease trap/food-related waste processing and discharged to the City of Dallas sanitary sewer system.

27. VENTILATION AND AIR POLLUTION CONTROL (330.245)

Grease trap and food-related waste processing occurs within the enclosed process building. The enclosed processing area ventilation system is connected to an air scrubber. Openings to the processing building must be controlled such that the building is under negative pressure. The doors to the process building are to remain closed except when in use.

The scrubber is utilized to control odors and maintain a safe working environment. The scrubber is properly maintained and operated. Cleaning and maintenance are performed so that equipment efficiency is adequately maintained while operating.

Additional practices are used to control odors from the Facility. The municipal solid waste permit requires all incoming grease and grit trap wastes be processed within seventy-two hours. Maskants are dispersed by atomizers and/or misters to reduce odors. No hazardous or toxic wastes are received for processing at the facility. Equipment and processing equipment such as screens are washed frequently to minimize odors. Most wastes and recovered materials are stored in fixed-roof vented tanks. As indicated in Table SOP-3, the perimeter of the facility is checked daily for indications of odor issues.

The facility is committed to performing an audit to assess compliance with the Texas Clean Air Act within six months from the date of this document submittal.

The facility utilizes sumps to minimize the ponding of water within process areas. Accumulated water within process areas is transferred to storage and treatment as described in Section 8.

28. HEALTH AND SAFETY (330.247)

The operator has developed and implemented a written safety plan in connection with the operator training program. Supervision of all activities will be maintained to ensure the safety of all persons on the premises. All LES employees are required to attend an appropriate health and safety training class prior to starting their assigned job, and to take refresher training when applicable, per OSHA standards for general industry.

29. EMPLOYEE SANITATION FACILITIES (330.249)

A restroom including a commode and sink with potable water is provided for the use of all employees and visitors in the office area.

30. DISEASE VECTOR CONTROL

Wastes are fully contained within the processing site, and materials will be stored in an enclosed building, vessel, or container. Spills will be removed and processed immediately. No materials will be left to attract vectors. If a problem develops, a professional pest control service will be consulted. The services provided may include placing rat baits for rodent control, spraying insecticides, and/or placing insect baits for insect control. Additional pesticide management may occur as recommended by the pesticide service. Daily sanitation is performed as a good housekeeping practice, reducing the attraction of potential vectors. Minimizing ponded water also reduces the attraction of potential vectors.

LES reserves the right to train its employees and obtain applicable licenses and/or certifications to apply pesticides at the facility. The pesticides would be applied in accordance with manufacturer's instructions and in conformance with applicable federal, state, and local regulations.