

1415 Louisiana
Suite 2500
Houston, Texas 77002

Tel: (713) 759-0999
Fax: (713) 308-3886

www.browncaldwell.com

November 6, 2007

**BROWN AND
CALDWELL**

Bobbie A. Rogans
Waste Permits Division
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building F, MC - 126
Austin, Texas 78753

**SUBJECT: RESPONSE TO ADMINISTRATIVE NOTICE OF DEFICIENCIES
LIQUID ENVIRONMENTAL SOLUTIONS OF TEXAS, LLC
11961 RAILROAD DRIVE, EL PASO, EL PASO COUNTY,
TEXAS 79934
APPLICATION FOR MSW PERMIT NO. 2355
CN 601540404 RN 105336006**

Dear Ms. Rogans:

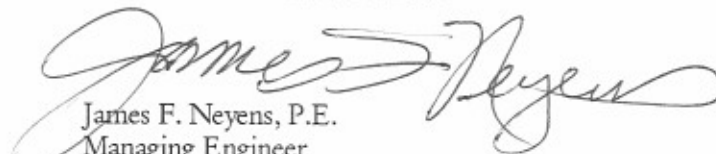
Enclosed are one original and three (3) copies of our additional response to your Notice of Deficiencies (NOD) dated September 28, 2007. Our first NOD response was dated October 30, 2007.

A supplementary technical report that addressed the criteria of §305.45 (a) (8) was enclosed as Attachment 2 in our October 30, 2007 NOD response. As requested, we are resubmitting this report as Attachment 14 in Part III.

We appreciate your review of this additional NOD response, and welcome any questions or comments. Please do not hesitate to contact Jim Neyens of Brown and Caldwell at 713-759-0999 if you have any questions.

Yours very truly,

BROWN AND CALDWELL


James F. Neyens, P.E.
Managing Engineer

cc: Mr. Pat Reilly, Liquid Environmental Solutions
 Mr. John Love, Liquid Environmental Solutions
 Mr. Todd Ford, Liquid Environmental Solutions

 Brown and Caldwell Project File

PART III

SITE DEVELOPMENT PLAN
TYPE V MUNICIPAL SOLID WASTE FACILITY
PERMIT APPLICATION

for

LIQUID ENVIRONMENTAL SOLUTIONS OF TEXAS, LLC

El Paso Facility
11961 Railroad Drive
El Paso, Texas 79934
MSW Permit No. 2355
CN No. 601540404
RN No. 105336006

August 31, 2007
Revised November 6, 2007

Prepared by:

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

and

Brown and Caldwell
1415 Louisiana, Suite 2500
Houston, Texas 77002



Part III Table of Contents

1.	Site Development Plan.....	3
2.	General Facility Design	3
3.	Facility Surface Water Drainage Report.....	6
4.	Waste Management Unit Design	9
5.	Geology Report.....	10
6.	Groundwater Sampling and Analysis Plan	10
7.	Landfill Gas Management Plan.....	10
8.	Closure Plan	10
9.	Post-Closure Plan.....	13
10.	Cost Estimate for Closure and Post-Closure Care	13

Tables

1	Closure Cost Estimate.....	14
---	----------------------------	----

Attachments

1	Site Development Sequence.....	A-1
2	Facility Access Plan – Phase 1.....	A-2
3	Facility Access Plan – Phase 2.....	A-3
4	Facility Access Plan – Phase 3.....	A-4
5	Grease Processing Flow Diagram.....	A-5
6	Grit Processing Flow Diagram	A-6
7	Waste Receiving and Storage Site Plans.....	A-7
8	Grease Receiving and Storage Facility Plan.....	A-8
9	Processing Building Plan	A-9
10	Grit/Solids Receiving Facility Plan.....	A-10
11	Existing Site Drainage Plan.....	A-11
12	Proposed Drainage Plan	A-12
13	Operations Area Drainage Plan	A-13
14	Supplementary Technical Report.....	A-14



**PART III – ATTACHMENT 14
SUPPLEMENTARY TECHNICAL REPORT
LIQUID ENVIRONMENTAL SOLUTIONS OF TEXAS, LLC
EL PASO FACILITY
MSW PERMIT NO. 2355**

OCTOBER 26, 2007

This supplementary technical report is intended to address the requirements of 30 TAC 305.45 (a)(8). It was prepared by the undersigned Texas licensed professional engineer, a qualified person who is both competent and experienced in the field to which this permit application relates, and is thoroughly familiar with the operation and project for which the application is made.

A. General Description of the Facilities And Systems For Collection, Transportation, Treatment And Disposal Of Waste

Waste consists of liquid materials with some associated solids that is collected from grease traps (initially), grit traps and septic tanks (future). Collection is accomplished by vacuum trucks of various sizes. Transportation to the proposed facility is by these same vehicles, some of which are owned and operated by the applicant and some by other commercial liquid waste haulers. In either case, the waste is completely enclosed in water-tight steel tanks during transport.

Treatment at the proposed facility may consist of some and eventually all of the following:

- Screening the remove coarse solids
- pH adjustment
- Heating to improve separation of water and fats, oils and grease (FOG)
- Gravity separation to facilitate removal of both grit and other heavier-than-water solids and the lighter FOG
- Dissolved air floatation for enhanced removal of FOG, and
- Solids dewatering with a filter press.

Incoming liquid wastes are generally 90 to 95 percent or more water. The treatment options discussed above are used to separate FOG and solids from the liquid, which is then treated as necessary to meet the wastewater discharge criteria of the El Paso Water Utilities, which operates a publicly owned treatment works (POTW). This treated wastewater is monitored for flow and water quality parameters, and discharged to a sewer leading to the POTW.

Dewatered solids are hauled to and disposed at an El Paso-area, State-permitted landfill. Recovered FOG is beneficially reused or recycled, such as a feedstock for the production of methane gas. If no market exists for beneficial reuse, the FOG may be landfilled.

B. Waste Volumes and Characteristics

Depending on the origin/nature of the waste, incoming waste is deposited at the grease trap waste (initial) or grit trap/septic tank (future) receiving areas. Following are the anticipated average and maximum rates of waste receiving and processing over representative time periods:

	Grease Trap Waste	FOG	Grit-Trap Waste/Septage Sludge
Initial Ave. Rate, gal/day	40,000	2,000	40,000 / 4,000
Initial Max Rate, gal/mo	1,200,000	600,000	1,200,000 / 120,000
10 year Ave. Rate, gal/day	200,000	10,000	200,000 / 20,000
10 year Max Rate, gal/mo ¹	6,000,000	300,000	6,000,000 / 600,000
Approx. Characteristics ²	95% Water, 5%	FOT	90% Water, 10% Grit and Solids

Note: 1) Proposed maximum monthly limit is 6,000,000 gallons per month, in any combination of pre-approved waste streams.

2) Wastes have no significant physical, thermal, organic bacteriological or radiological properties or characteristics, other than those described previously in this Supplementary Technical Report.

C. Other Information

Other information regarding the proposed project and operation may be found in Parts I through IV of this permit application. Each of these parts is preceded by a Table of Contents which serves as a guide to the location specific information.

Nothing in this proposed project or operation pertains to §331.121 of this title (relating to Class I Wells), §331.122 of this title (relating to Class III Wells), §305.50 of this title (relating to Additional Requirements for an Application for a Hazardous or Industrial Solid Waste Permit and for a Post-Closure Order), §305.48 of this title (relating to Additional Contents for Applications for Wastewater Discharge Permits), §305.54 of this title (relating to Additional Requirements for Radioactive Material Licenses), §336.207 of this title (relating to General Requirements for Issuance of a License), §336.513 of this title (relating to Technical Requirements for Active Disposal Sites), §336.617 of this title (relating to Technical Requirements for Inactive Disposal Sites), and §336.705 of this title (relating to Content of Application). Information required Chapter 330, Subchapter E of this title (relating to Permit Procedures) is found in Parts I through IV of this application.

Prepared by:


James F. Neyens, P.E.

