

LIQUID ENVIRONMENTAL SOLUTIONS OF TEXAS, LLC

Policy and Procedures Waste Acceptance Procedures Houston, Texas Facility

Statement of Policy

Liquid Environmental Solutions of Texas, LLC (LES) will provide a mechanism by which previously approved wastes will be screened for acceptance for processing at the facility. The purpose of this mechanism will be to provide consistent Waste Acceptance Procedures that will allow the facility to operate in accordance with federal, state and local regulations. The procedures will assure that incoming wastes are consistent with profile samples and are processed accordingly.

Procedure

This document outlines the minimum required steps involved with the proper acceptance and treatment of approved wastes. It details the necessary procedures, paperwork, analytical data and processing requirements for all wastes accepted for treatment at the LES facility.

All wastes must be accompanied by a manifest or trip ticket in order to be accepted for processing at the facility. No wastes will be accepted unless accompanied by a properly completed manifest or trip ticket signed by both the generator and the transporter of the waste. Spot checks will be performed on at least 10 percent of the waste loads coming into the facility. In addition, operations and laboratory personnel are authorized and encouraged to check suspicious loads for any contaminant. Plant personnel will monitor unloading of all trucks. The methodology for sampling and analysis of suspect loads begins with observation of wastes and detection of potential problems by sight and smell.

Septic wastes and grease trap/food-related wastes are in general unlikely to contain hazardous waste constituents or to be characteristically hazardous. However, additional waste acceptance procedures are followed for other incoming wastes to provide an additional level of assurance that the wastes are consistent with their waste profile. If consistent with the waste profile, as described in the Pre-Acceptance Requirements, the wastes should not be hazardous and should be compatible with treatment processes and other wastes received at the facility.

Prior to acceptance, all incoming wastes except septic and grease trap wastes must have been 1) evaluated in accordance with the Pre-Acceptance Requirements, 2) approved for treatment by the Laboratory Manager, and 3) assigned a profile number. If any of the above elements are not completed, the waste must be rejected by the facility.

The acceptance of wastes for processing at the LES facility will be contingent upon both generator compliance with established requirements and the implementation of proper waste shipment acceptance procedures at the facility. Both routine and special waste verification evaluations may have to be conducted by LES in order to confirm that waste

shipments are accurately characterized by the generator-supplied documentation. An overview of projected daily waste receipts and a discussion of facility waste acceptance procedures are presented herein.

Projected Daily Waste Receipts

The daily volume of waste to be received and processed at the facility is expected to vary throughout the life of the facility. Waste deliveries will be scheduled so that waste receipts do not exceed the facility's treatment capacities. The actual amount of waste received for processing on any given day will be influenced by the following two primary factors:

- ◆ The demand for commercial processing capacity.
- ◆ The treatment capacity of the facility.

In no event will wastes receipts exceed the proposed permitted limit of 8.35 million gallons per month.

Waste Acceptance Procedures

Prior to the acceptance of any waste shipment for processing, that waste must be approved by LES management in accordance with the Pre-Acceptance Requirements. Subsequent to management acceptance, waste acceptance procedures will then be followed. These managerial and operational waste acceptance procedures are described in detail herein.

Scheduling of Incoming Waste

All incoming waste must be coordinated through the Plant Manager or designated individual for the facility. The incoming waste schedule will be prepared based upon the daily available treatment capacity for the facility. The schedule will be communicated to the appropriate facility manager on a daily basis.

Incoming Waste Acceptance Procedure and Waste Recordkeeping

Upon arrival of all wastes into the facility, the Laboratory Manager or designated individual will perform the following steps to accept the material into the facility for treatment:

1. Obtain the manifest or bill of lading for the incoming material and verify that the generator information is correct, that LES is shown as the designated facility, that the incoming material has a valid profile number (if applicable) shown on the manifest, and that the manifest or bill of lading has all the appropriate signatures.
2. Compare the volume of the material with the total volume shown on the manifest(s) or bill(s) of lading.
3. Except for septic and grease trap/food-related wastes, collect a representative verification sample of the incoming waste and perform the

necessary analyses to determine consistency with the Fingerprint analyses performed on the treatability sample. This information will be recorded in the Fingerprint Log to establish a time trend for the waste. Representative samples will be collected in accordance with the following protocol.

The Unloading Attendant will collect a one-pint sample of waste from each shipment of waste that arrives at the facility and place it in a sample jar. Jars containing waste samples taken from incoming transport vehicles for submission to the laboratory will be marked with the following information:

- Date,
- Generator name,
- Waste manifest number,
- LES waste profile number,
- pH,
- Flash point, and
- Special handling instructions when applicable.

The generator-supplied waste characterization will provide LES with information concerning both the distribution and nature of the components within the received wastes. Field-sampling methods will be employed to obtain a representative sample of a specific waste shipment to the facility. The purpose of the inspection and testing at this point will be to ensure that the shipped waste is indeed the waste designated on the accompanying manifest. This evaluation will also help target the appropriate techniques to be used to treat the waste stream.

The laboratory, which is located in proximity to the Inspection and Sampling Area, has the capability for conducting the analyses required to quickly characterize a waste sample. The field sampling protocol is based on prior experience with the waste generator and transporter and the consistency of accurately documented waste streams previously accepted. Particular caution is exercised when evaluating one-time bulk waste shipments.

The sample will be evaluated for one or more of the following parameters using the procedures as describe below:

Color and Physical State: A visual inspection of the waste will be made to help verify that the waste received corresponds to the Fingerprint Analysis.

Odor: Strong incidental odors will be noted and recorded for consistency with the Fingerprint Analysis.

Ignitability: The waste sample may be tested to determine whether it is ignitable at 140°F or less.

pH: A calibrated meter will be used to measure the pH of the waste sample.

Chemical Oxygen Demand: COD may be tested to compare to fingerprint values.

Density/Specific Gravity: The specific gravity or density of the waste sample may be measured and recorded for comparison to the Fingerprint Analysis.

Total Suspended Solids: The fraction of suspended solids present in the sludge and slurry wastes may be determined for the sample for comparison to Fingerprint values.

Should the results of the inspection and/or the field testing by the Laboratory Manager warrant a further evaluation, additional information may be requested from the generator to reconcile discrepancies. If it becomes apparent that hazardous or unauthorized wastes are being transported, disposal must be refused until all concerns about waste characterization and/or bill of lading/uniform manifest discrepancies have been satisfied.

Records associated with the acceptance of waste material will be retained at the facility for a minimum of three years from the date of acceptance.