

LIQUID ENVIRONMENTAL SOLUTIONS of TEXAS, LLC

Policy and Procedures Recordkeeping and Reporting Houston, Texas Facility

Proper recordkeeping and reporting procedures will be conducted during waste processing operations within the facility. The waste management record keeping procedures that will be followed and the reporting requirements that will be met are summarized below.

Waste Management Recordkeeping:

Manifests must accompany all Class I wastes accepted for processing. In accordance with 30 TAC Section 335.12, the following procedures will be maintained for manifested wastes:

- a. The manifest must accompany the shipment and must designate Liquid Environmental Solutions of Texas, LLC (LES) as the receiving facility.
- b. An authorized LES representative will sign and date the manifest and return at least one copy of the signed manifest to the transporter.
- c. One copy is to be retained for LES files for a minimum of three years.
- d. Within 30 days of delivery, one copy of the completed manifest must be returned to the generator or primary exporter.

LES will maintain a data management system at the facility to track and record the wastes processed at the facility. The following information will be recorded for each waste in the data management system:

- Waste analysis testing,
- Fingerprint analysis testing, and
- Waste acceptance testing and sampling results.

Reporting:

The Laboratory Manager will assume the responsibility of maintaining monitoring records and preparing the reports required by the Texas Commission on Environmental Quality (TCEQ). LES will provide regular reports to the TCEQ for the following facility operational areas:

- Manifest discrepancy reports as required by 30 TAC Chapter 335.12. Discrepancies include different wastes received other than what is specified on the manifest, variations in bulk volume of greater than 10% (which would also represent a 10% variation in weight), or differences in the piece count of a shipment. If the discrepancy is not resolved within 15 days after receiving the waste shipment, LES will report the discrepancies to the Executive Director of the TCEQ by letter.
- Monthly summary reports of Class I waste shipments received at the facility as required by 30 TAC Chapter 335.15. These reports are required to be submitted on forms provided by the TCEQ on or before the 25th of each month for wastes or manifests received during the previous month. Reports must be prepared and submitted even if no waste is received.

- An Annual Waste Summary report detailing Class I waste management as required by 30 TAC Chapter 335.9. This annual report is due on or before January 25th of each calendar year and will be submitted in the format required by the TCEQ.
- Oral reports as specified in 30 TAC Chapter 305.145 will be provided within 24 hours to report any noncompliance including solid waste releases, discharges, fires, or explosions that may present a threat to human health, public safety, or the environment. In addition to the oral report, a written report will be provided within five days of the discovery of the event.

Records of inspections, monitoring, and reports will be maintained at the facility for a minimum period of three years except as otherwise specified. Copies of all permanently archived records will be maintained at the LES corporate office in Dallas, Texas.

Authorized TCEQ personnel may make copies of all inspections, records, and reports available for review at the facility during inspections. Although all required records are maintained on site, advance notification will facilitate the assembling of requested materials for review during inspections.