

**TYPE V MUNICIPAL SOLID WASTE FACILITY  
TCEQ MSW PERMIT 2234A**

**PART IV  
SITE OPERATING PLAN**

**for**

**LIQUID ENVIRONMENTAL SOLUTIONS OF TEXAS, LLC**

**Houston Facility  
250 Gellhorn Street  
Houston, Texas 77013**

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**TBPE Reg. # F-2139  
August 26, 2009**

**Part IV (Site Operating Plan)  
TYPE V PERMIT APPLICATION  
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## 1. Introduction

Liquid Environmental Solutions of Texas, LLC (LES) is in the business of processing non-hazardous liquid wastes. The LES Houston Facility is a de-watering, recycling, and pre-treatment facility. 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 such wastes requires a Type V Municipal Solid Waste (MSW) permit.

The purpose of this major permit amendment is to increase the monthly permitted waste receipts from 6 million gallons per month to 8.35 million gallons per month. The basis for this request is included in Attachment SDP-1 to the Site Development Plan (SDP). Additional changes requested in this permit submittal include changing the name of the Owner/Operator from “Liquid Environmental Solutions of Texas, L.P.” to “Liquid Environmental Solutions of Texas, LLC” and replacing the facility boiler. The facility has received a temporary authorization from the Texas Commission on Environmental Quality (TCEQ) regarding the boiler replacement. The new boiler is reflected in Table SDP-4 of the SDP.

The original MSW permit application for Permit 2234A, currently owned and operated by LES, was submitted on April 15, 1994. Since that time, there have been a total of eight 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
4/15/1994	Original	Original (Old)	Original	Original
7/13/1995	-	-	Revision 1	Revision 1
10/13/1995	Revision 1	-	-	Revision 2
6/1/2004	Revision 2	Revision 1	Revision 2	Revision 3
11/1/2005	Revision 3	Revision 2	-	Revision 4
2/1/2006	Revision 4	Revision 3	Revision 3	Revision 5
11/27/2006	-	Original (New)	-	Revision 6
6/28/2007	-	Revision 1	-	Revision 7
5/30/2008	-	Revision 2	Revision 4	Revision 8

**Table SOP-1: Revision history for MSW Permit No. 2234A.**

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 Houston, 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, 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 discharge 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 SDP 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 groundwater contamination incidents; and
- performing shutdown operations.

The facility's personnel training hard copy files are kept on site and 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 waste receipts from 6 million gallons to 8.35 million gallons.

## 7. Facility-Generated Wastes (330.205)

The wastes and recyclable products generated by the 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 will be discharged into the City of Houston sanitary sewer system pursuant to the facility's Industrial Waste Permit No. 6817 provided as Attachment SDP-2 in the SDP. The facility's daily flow rate is not limited in the permit. As indicated in the discharge permit, the facility is subject to the United States Environmental Protection Agency's (EPA's) Centralized Waste Treatment (CWT) Rule at 40 CFR Part 437. In addition to the constituents listed in this discharge permit, facility effluent must be analyzed at least annually for total petroleum hydrocarbons (TPH), fats, oil, and grease, and pH in accordance with 30 TAC 330.203 (c). Sampling and analyses conducted to satisfy this regulatory requirement will be conducted in accordance with EPA approved methods.
- Solids/sludges – solid waste will be disposed of 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. To reduce the possibility of disposal of hazardous waste from the facility, LES samples its recovered oil product for total organic halides (TOX) using field test kits. If TOX concentrations exceed 1,000 parts per million (ppm), LES will send samples to commercial laboratories for analysis for total halogenated hydrocarbons. These tests are used to prevent the disposal/recycling of recovered oil that does not meet the regulatory definition of used oil found in 30 TAC 324 and 40 CFR 279.10.

Sludges produced on site which will 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) Test 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. Sludges exceeding these limits may not be transported to a municipal solid waste landfill for disposal. In accordance with 30 TAC 330.203 (c), sludges disposed of at municipal solid waste landfills must be analyzed for

these constituents at least annually. Sampling and analyses conducted to satisfy this regulatory requirement will be conducted in accordance with EPA approved methods.

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 will be controlled to minimize surface water running onto, into, and off of the process areas. Water that has the potential to become impacted by process operations will be collected within bermed process areas or hydraulically-separated drainage areas. This potentially contaminated stormwater is normally collected and either directly treated or stored for treatment. Either way, all potentially contaminated water is typically pre-treated on site and routed to the City of Houston sewer system for additional treatment in accordance with the City of Houston industrial user discharge permit. 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. Additionally, oil and grease concentrations of treated effluent must not exceed 200 mg/L.

Stormwater from non-process areas is excluded from the process area stormwater and flows off site as non-contact water. Additional detail on stormwater management is provided in Section 9 of the SDP. As described in Section 13 of the SDP, the facility is engaged in a series of projects to improve stormwater segregation capability.

No contaminated waters will be discharged off site without approval under Texas Pollutant Discharge Elimination System (TPDES) authority. All waste acceptance, storage, and processing activities are conducted within concrete paved areas. The facility will not discharge to a septic system.

### **9. Storage Requirements (330.209)**

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

### **10. Approved Containers (330.211)**

Any solid waste containing food wastes will be 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 training records will be maintained in accordance with 30 TAC 330.219(b)(2).

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:
  - The authorization is made in writing by the owner or operator as described in 30 TAC 305.44(a);
  - 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
  - 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 solid waste summary reports and the annual 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 3 years.

## **15. Fire Protection (330.221)**

The facility is within the jurisdiction of the City of Houston 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 adjacent to the site on Gellhorn Drive and Woodforest Boulevard.

While the nonhazardous wastes handled by the facility 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 annual 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 plant operator 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. An employee emergency action plan is maintained on site.

## **16. Access Control (330.223)**

The site is enclosed by a minimum 6-foot high chain link fence topped with barbed wire and 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:

- The facility must notify the TCEQ regional office within 24 hours of the breach and of a repair schedule;
- The facility must make temporary repairs within 24 hours;

- The facility must make permanent repairs within the schedule provided to the TCEQ regional office;
- The facility must notify the TCEQ regional office that the repair has been completed within the schedule provided; and
- 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. Truck access is described in Section 2 of the SDP. All truck traffic must proceed directly to the laboratory. 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 gates are secured when the facility is not operational.

#### **17. Unloading of Waste (330.225)**

Offloading occurs at the non-hazardous industrial waste basins, the grit basin, the grease trap unloading basin, and the solidification area. These areas 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 2 to the WAAP. As described in these procedures, a facility operator is always present to direct drivers to the appropriate receiving location and to ensure that wastes are off-loaded to the desired storage vessel or processing unit. Facility staff are present most of the time 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, the entrance gate is locked to prevent unauthorized entry.

The facility is closed to dumping of any kind. Any waste unloading in an unauthorized area will be promptly removed. Video surveillance as described in Section 2 of the SDP aids in the monitoring of unloading areas. Unloading of waste will be confined to the specified unloading areas and unloading will be monitored by trained personnel. Any prohibited waste received will be promptly returned to the transporter or generator of such waste; the facility will maintain records in the site operating records of unauthorized material rejected or removed from the facility.

#### **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 has been permitted by the TCEQ to operate 24 hours per day, 7 days per week. A sign is prominently posted to inform the public that the facility's normal hours of operation are from 6:30 AM to 6:30 PM on Monday through Friday, 7:30 AM to 12:30 PM on Saturday, and after hours by appointment only.

**20. Facility Sign (330.231)**

Both the entrance and exit to the site through which wastes are received conspicuously display 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, and 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 site is enclosed by a fence, as described in Section 16. 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/or 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. All interior roads are of concrete construction to minimize tracking of mud and trash onto public roadways and are considered all-weather roads. While the gravel truck parking area does not cause issues with mud, some dust is tracked off this area. The dust is usually confined within

approximately 3 feet of the truck parking area. A skid steer is used to sweep up the dust as needed. Otherwise, mud and dust do not pose any issues at the facility and are not tracked off the property.

The access roads and parking lots are checked daily as indicated in Table SOP-3 and are maintained as needed to minimize depressions, ruts, or potholes.

#### **24. Noise Pollution and Visual Screening (330.239)**

The facility is screened from public view along Gellhorn Drive with existing and added native landscaping including trees, shrubbery, or equivalent flora. This vegetation will be maintained and replaced if disturbed. Additional landscaping, trees, shrubbery, or equivalent flora shall be added and maintained along the frontage of the fenced property to further shield and conceal the processing areas from public view. The site office and laboratory building provides an effective visual barrier between the receiving and operations areas and public view approaching and near the site.

Noise generated by the facility is primarily the result of the operations of pumps and trucks. No excessively loud devices are used at the facility. Adequate distances to neighboring properties and the absence of residences in the immediate vicinity should eliminate potential problems arising from noise.

#### **25. Overloading and Breakdown (330.241)**

Incoming solid waste will not be accumulated in quantities in which processing can not begin within 72 hours. Incoming wastes are typically off-loaded directly into processing units and processed liquid materials (oil and grease) are stored in fixed-roof vented tanks to reduce odors and prevent insect breeding and harboring of other vectors. Processed wastewater is not stored on site; it is discharged to the City sewer system. Receipt of additional wastes beyond those that can be introduced into processing 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. If needed during periods of substantial precipitation, the maximum amount of waste to be accepted at the facility will be reduced such that the sum of the runoff collected in the process area for treatment and the waste accepted is not in excess of the capacity of the facility or permit limits.

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 24 hours, additional wastes will be received only to the capacities of the receiving stations. If the upset or breakdown period is anticipated to last longer than 24 hours, on-site 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)**

All working surfaces to which employees are regularly exposed and which come into contact with wastes will be washed down on at least a weekly basis. Processing floors and slabs will be swept daily and washed down at least two times per week.

Wash waters will not be allowed to accumulate on site without proper treatment. Floor sumps are provided to facilitate collection of wash-down liquids. Liquids thus collected will be treated by the facility through the wastewater treatment system and discharged to the sanitary sewer.

## **27. Ventilation and Air Pollution Control (330.245)**

Ventilation and odor control measures are described in Section 4 of the SDP. As indicated in Section 9, all liquid wastes and recovered materials are stored in fixed-roof vented tanks. While some waste processing activities occur outdoors in open units, the facility empties waste receiving units daily and washes the process areas at least weekly. The facility also uses the misting/fogging system network described in Section 4 of the SDP to control the spread of odors off site using regular monitoring for odors and wind direction and three stages of control as required. The first stage consists of misting at the source of odors (grease trap offloading, the grease vibrating screen(s), and the industrial basins). The second stage includes misting along the perimeter fence and solidification area. The third stage includes fogging using the entire network. Monitoring for odors is conducted daily as indicated in Table SOP-3 in Section 4. Additionally, the facility maintains a minimum 50-foot buffer between the process area and the property boundary. The misting/fogging system is properly maintained in accordance with manufacturer recommendations.

Additional practices are used to control odors from the Facility. The municipal solid waste permit requires that all processing of incoming grease and grit trap wastes begin within seventy-two hours. 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. .

The facility is conducting an audit to assess compliance with the Texas Clean Air Act.

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 orientation class prior to starting their assigned job and re-fresher training when applicable per Occupational Safety and Health Administration (OSHA) standards for general industry. Orientation provides OSHA training for, at a minimum, the following: Haz-Com, Material Safety Data Sheets (MSDS), Forklift-Backhoe-Skid loader, Fire Extinguisher Use, Ladder Safety, Slip, Trip, and Fall, Lock-out-Tag-out, Boiler Safety, Confined Space Awareness, Personal Protective Equipment (PPE) (head, hand, foot, respirator), Hearing Conservation, Spill Contingency Plan, Compressed Gas Cylinder, Employee Emergency Action Plan.

## **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. The office building also contains a locker room for plant operators, which contains a sanitary wash basin, commodes, and showers. Another restroom is available for vehicle operators in the laboratory. The processing building contains a sanitary wash basin, and an additional employee restroom is located next to the boiler room.

## **30. Disease Vector Control**

Wastes are fully contained within the processing area and materials are stored in an enclosed building, vessel, or container. Spills outside of containment will be removed and processed immediately and spills inside containment are controlled and cleaned up regularly. 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.