LIQUID ENVIRONMENTAL SOLUTIONS OF TEXAS, LLC BURLESON ROAD FACILITY, AUSTIN, TRAVIS COUNTY, TEXAS

MSW TYPE V REGISTRATION APPLICATION NO. 40285

Part IV

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LIST OF ATTACHMENTS

ATTACHMENT

- 1 CONTAMINATED WATER MANAGEMENT PLAN
- 2 FIRE PROTECTION PLAN
- 3 SITE HEALTH AND SAFETY PLAN





4.0 §330.65 CONTENTS OF PART IV OF THE APPLICATION

4.1 §330.65(a) SITE OPERATING PLAN

This site operating plan (SOP) provides general operating procedures for the day-to-day facility operations. The SOP will be retained during the active life of the facility. The SOP is designed to provide a description of how the requirements of 330 Texas Administrative Code Subchapter E will be implemented.

4.2 §330.65(b) ENVIRONMENTAL MANAGEMENT SYSTEM

Environmental management system is not applicable to this MSW Type V Facility.

4.3 §330.65(c) LEACHATE AND GAS CONDENSATE

Recirculation of leachate and gas condensate are not applicable to this MSW Type V Facility.

4.4 §330.65(d) TEXAS POLLUTION DISCHARGE SYSTEM REQUIREMENTS

The facility will comply with the requirements under the Texas Pollution Discharge Elimination System (TPDES) and any permit requirements imposed by other agency's to include the City of Austin's pretreatment program.

4.5 SUBCHAPTER E: OPERATIONAL STANDARDS FOR MUNICIPAL SOLID WASTE STORAGE AND PROCESSING UNITS

4.5.1 §330.201 Applicability

Subchapter E of 30 TAC §330 is applicable to this MSW Type V Facility. Compliance with each rule of this subchapter is discussed in the following sections of this Part IV of the Registration Application.

4.5.2 §330.203 Waste Acceptance and Analysis

The facility dewaters, reclaims and pre-treats liquid and semi liquid waste by separating the solid material and oil/grease portion from the aqueous portion of these wastes. The facility will receive for storage, transfer and processing those waste streams identified in Part I, Supplemental Technical Report. Waste received at this facility will be non-hazardous and compatible with this type of treatment facility. The facility will not accept

waste defined in 30 TAC §330.15, relating to General Prohibitions unless otherwise identified in this application and the issued Registration.

LES is developing the facility in two phases. The two phases will impact building size, available equipment and extent of recycling performed on-site. This application has been written to show the initial (Phase I) and final (Phase II) facility design. Waste acceptance volume and waste storage, as well as closure cost estimates, are based on final facility design at maximum capacity.

Waste acceptance for both Phase I and II begins as liquid waste is delivered to the facility via tanker truck/hauling truck. Before off-loading the waste and discharging the material into the Storage/Processing Tanks, the waste load manifest is checked to determine acceptability of waste. If the material is identified as an unauthorized or a prohibited waste, it will not be accepted at the facility. The tanker truck/hauling truck will back into the truck bay for off-loading.

A detailed description of the Phase I and II waste movement can be found in Part III, Section 3.2.2

The management of these waste streams will in no way cause the operation of the facility to deviate from applicable Federal, State or Local regulations. There are no usual constituents or characteristics associated with these wastes that will impact the design or operation of the facility.

4.5.2.1 §330.203(a) Sources and Characteristics of Waste

The sources and characteristics for the types of waste to be received at the facility include the following:

<u>Grease trap waste</u>. Grease trap wastes typically from restaurants, food preparation facilities and other food-related industries. These generators include municipal commercial sources including municipalities, food manufacturers, food preparation facilities and restaurants. A grease trap is an interceptor in the sanitary sewer line designed to trap food grease that is generated from dishwashing in a restaurant or any washdowns in a food processing facility. Grease traps help prevent high levels of fats, oil and grease (FOG),

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total suspended solids (TSS) in the liquid wastes from being discharged into the sanitary sewer. Typically, this waste contains floating matter made up primarily of animal and vegetable grease and oil, settled food particles, and wastewater containing large amounts of dissolved or suspended food mater. This waste is characterized by high levels of TSS and is acidic, with pH levels generally in the 4.0 to 5.0 range. Treatability is based on generator submitted information, and/or physical and chemical evaluation.

4.5.2.2 §330.203(b) Types and Estimated Amounts of Waste

During the initial facility design (phase I) operations, waste acceptance and storage will be limited to onsite tank capacity. This capacity is approximately 85,000 gallons of waste that can be held in storage not including waste being processed which is estimated to be approximately 47,025 gallons of waste. When phase II operations begin the maximum amount of waste to be received at the facility is 150,000 gallons per day (GPD). The maximum and average length of time waste will remain at the facility is shown in Table 1 below:

TABLE 1
RECEIPT, STORAGE AND PROCESSING DATA

Waste Type	Daily Volume Received (gallons)	Maximum Waste Storage (gallons)	Storage of Unprocessed Waste (Hours)		Time On Site (Days)		Processing Time (Days)	
			Max	Ave	Max	Ave	Max	Ave
Grease trap waste and those wastes found in Part I, Section 1.1 of the Supplemental	150,000	Phase 1 132,025 Phase 2	72	24	13	1	10	1
Technical Report		240,000						
Total Waste Volume	150,000	240,000	-	-	-	-	-	-

Solids are sent to an approved MSW landfill or other authorized facility. Grease product will be sent off-site to an approved processor or end user and all wastewater will be discharged to the City of Austin publicly owned treatment works (POTW).



The recovered grease will be at least 10% by volume of the incoming waste. The facility will maintain records and report on a quarterly basis provide this information to the Executive Director.

4.5.2.3 §330.203(c) Sampling Methods for Waste

Grease trap waste will be sampled once within 60 days of the initial receipt of waste and annually thereafter. The waste will be analyzed for benzene (EPA8021B), lead (EPA6020) and TPH using EPA-approved methods, with the results maintained in the operating record for three years.

Solids that are disposed at a municipal solid waste landfill will pass the Paint Filter Test, (EPA Method 9095) as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Publication Number SW-846). These solids will also be tested annually by approved EPA methods and analyzed for benzene, lead and total petroleum hydrocarbons (TPH). Additional testing differentiating TPH from fats, oils and greases and/or solids(FOGS) may be conducted to ensure the landfill does not receive petroleum hydrocarbon waste greater than 1,500 mg/kg. Additionally, process knowledge may be used in waste classification.

Table 2 identifies the standards, set in the MSW regulations that will not be exceeded:

TABLE 2
SOLIDS CONTAMINATE TESTING/LIMITS

CONTAMINANT	TOTAL LIMIT	TCLP LIMIT	TEST METHOD
Benzene	10 mg/kg	0.5 mg/L	EPA 8021B
Lead	30 mg/kg	1.5 mg/L	EPA 6020
TPH	1,500 mg/kg	NA	TX Method 1005/1006



Any additional testing required by individual landfills or composting sites for waste classification will be followed and all records of analysis will be retained on-site for a minimum of three years.

Process wastewater sampling and testing will be conducted at least annually for TPH; fats, oils, and greases and pH. Additionally, process knowledge may also be used in waste classification.

4.5.3 §330.205 Facility Generated Wastes

4.5.3.1 §330.205(a) Characteristics of Facility Generated Wastes

Wastes generated by the facility include wastewater and solids. The concentrated grease generated is a product and is not included in this discussion. All solids resulting from the process are dewatered and sent to an authorized facility. The remainder of the waste stream is wastewater which is discharged to a City of Austin POTW. Constituent concentrations for each facility generated waste will be at levels that can be adequately managed by an authorized facility or City of Austin POTW.

4.5.3.2 §330.205(b) Processing or Disposal of Facility Generated Waste

All solid waste generated by the facility can be adequately managed by this facility and/or TCEQ approved MSW landfills.

4.5.3.3 §330.205(c) Wastewater Management

Wastewaters generated by the facility will be managed in accordance with §330.207 relating to contaminated water management (Part IV, Attachment 1, Contaminated Water Management Plan).

4.5.3.4 §330.205(d) Facility Generated Sludge

Sludges and solids that are disposed at a municipal solid waste landfill will pass the Paint Filter Test, (EPA Method 9095) as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Publication Number SW-846). These solids will also be tested annually by approved EPA methods and analysis for benzene, lead and total petroleum hydrocarbons (TPH). Table 2 found in 4.5.2.3, §330.203(c) Sampling Methods for Waste, identifies the standards set in the MSW regulations that will not be exceeded.



Sludges that exceed the limits found in Table 2 shall not be disposed in an approved MSW landfill and will be sent to authorized facility for further processing or disposal as a hazardous waste, as appropriate or disposed in a municipal solid waste landfill with dedicated Class 1 industrial solid waste cells if the sludge is non-hazardous.

4.5.4 §330.207 Contaminated Water Management

A Contaminated Water Management Plan is included as Attachment 1 of this part.

- 4.5.5 §330.209 Storage Requirements
- 4.5.5.1 §330.209(a) Storage of Solids Waste

All waste will be stored in a manner that does not constitute a fire, safety or health hazard or provide food or harborage for animals and vectors and shall be contained so as not to result in litter. All storage containers will be of adequate size and strength and in sufficient numbers to contain all waste generated at the facility.

- 4.5.5.2 §330.209(b) and (c) *Source Separated or Recycled Material*Information required by this provision is not applicable to this MSW Type V Facility.
- 4.5.6 §330.211 Approved Containers

 Information required by this provision is not applicable to this MSW Type V Facility.
- 4.5.7 §330.213 Citizen's Collection Stations

 Information required by this provision is not applicable to this MSW Type V Facility.
- 4.5.8 §330.215 Requirements for Stationary Compactors

 Information required by this provision is not applicable to this MSW Type V Facility.
- 4.5.9 §330.217 Pre-Operation Notice

 Information required by this provision is not applicable to this MSW Type V Facility.
- 4.5.10 §330.219 Recordkeeping and Reporting Requirements

 The facility will maintain all records required by §330.219.



4.5.10.1 §330.219(a) Facility Maintained Records

A copy of the registration, the approved registration application, and all other required plans or related documents, including as-built construction drawings and specifications (if applicable), will be maintained at the facility or alternate location approved by the Executive Director. All plans will be considered part of the operating record for the facility. These plans will be available for inspection by agency representatives.

4.5.10.2 §330.219(b) Required Records for Recordkeeping

Information and data will be promptly recorded, as appropriate, in the operating record and retained at the facility during the active life of the facility. The owner or operator will promptly record and retain the following information, in either a printed or electronic format, in the operating record:

- (1) Any and all applicable location-restriction demonstrations.
- (2) Inspection records and training procedures.
- (3) Closure plans and any monitoring, testing, or analytical data relating to closure requirements.
- (4) All cost estimates and financial assurance documentation relating to financial assurance for closure.
- (5) Copies of all correspondence and responses relating to the operation of the facility, modifications to the registration, approvals, and other matters pertaining to technical assistance.
- (6) All documents, manifests, shipping documents, trip tickets, etc., involving special waste.
- (7) Any other document(s) as specified by the approved authorization or by the Executive Director.
- (8) Not Applicable.
- (9) Recordkeeping provisions to justify, on a quarterly basis, that the relevant percentage of the incoming waste is processed to recover recycled products for applicable



facilities. The owner or operator shall submit per §330.675 an annual report to the Executive Director by March 1st summarizing the recycling activities and percent of incoming solid waste that was recycled during the past calendar year. All fee's required by §330.671(b)(3) will be paid and the receipt of fee payment will be kept as part of the facility's recordkeeping requirements.

4.5.10.3 §330. 219(c) Signatory Requirements

For signatories to reports, the following conditions apply;

4.5.10.3.1 <u>§330.219(c)(1) Signing of Reports</u>

The owner or operator will sign all reports and other information requested by the Executive Director as described in 30 TAC §305.44(1) or by a duly authorized representative of the owner or operator. Authorization of the duly authorized representative will be in accordance with §330.219(c)(1)(A)-(C).

4.5.10.3.2 <u>§330.219(c)(2) Assignment of New Signatory</u>

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 §330.219(c) will be submitted to the Executive Director prior to, or together with, any reports, information, or applications to be signed by an authorized representative.

4.5.10.3.3 §330.219(c)(3) Signatory Certification Statement

Authorized signatories will make the certification in 30 TAC §305.44(b).

4.5.10.4 §330.219(d) Composting and Landfill Mining Records

Information required by this provision is not applicable to this MSW Type V Facility.

4.5.10.5 §330.219(e) Records Availability

All information contained in the operating record will be furnished upon request to the Executive Director and will be made available at all reasonable times for inspection by the Executive Director.

4.5.10.6 §330.219(f) Records Retention

The owner or operator will retain all information contained within the operating record and the different plans required for the facility for the life of the facility.



4.5.10.7 §330.219(g) Alternate Recordkeeping Schedule

The Executive Director may set alternative schedules for recordkeeping and notification requirements as specified in subsections §330.219 (a)-(e).

4.5.11 §330.221 Fire Protection

An adequate supply of water under pressure will be available for firefighting purposes. Firefighting equipment will be available as required by local fire codes.

A Fire Protection Plan has been developed; please refer to Part IV, Attachment 2. All employees will be properly trained in the contents and use of this Fire Protection Plan. If local fire codes are changed, the Fire Protection Plan will be revised as needed.

4.5.12 §330.223 Access Control

4.5.12.1 §330.223(a) Public Access Control

Public access to the loading/unloading areas of the facility is controlled by a perimeter fence consisting of four-foot barbed wire fence or a six-foot chain-link fence or equivalent which is appropriate to protect human health and safety and the environment. Uncontrolled access to the facility, to include administrative offices, storage and processing areas shall be prevented. An attendant shall be on-site during operating hours. While the facility is approved for 24/7 operations, the facility may choose not to operate 24/7, therefore access control will be maintained when waste handling activities are occurring.

4.5.12.2 §330.223(b) Facility Access Road

The facility access is an all-weather driveway designed for the expected traffic flow. There are adequate turning radii for all transport vehicles that will utilize the facility. Parking will be provided for transport trucks/trailers, employees and visitors. The all-weather surfaces within the facility will be maintained to control dust and mud.

4.5.12.3 §330.223(c) Perimeter Access

Access to the registration boundary will be controlled by a perimeter fence with lockable gates. The perimeter fence will consist of a four-foot barbed wire fence or a six-foot chain-link fence or equivalent. Waste storage will be located within the perimeter fencing and/or processing



building but will not be located within the buffer zone or any easements or right-of-way crossing the facility. An attendant shall be on-site during operating hours. While the facility is approved for 24/7 operations, the facility may choose not to operate 24/7, therefore access control will be continuously maintained.

4.5.13 §330.225 Unloading of Waste

4.5.13.1 §330.225(a) Waste Unloading Area

Incoming trucks will be directed through signs to the unloading area. The unloading of waste is confined to the unloading area as shown in Part III, Figures 4A and 4B, Facility Floor Layout Plan. Waste is unloaded in the unloading area where incoming tanker truck(s) will be connected to a hose that is connected to a large debris filter or rock box. The waste passes through the debris filter/rock box to holding tanks for further waste processing.

An attendant is present to monitor all incoming loads or waste. The facility is not required to accept any solid waste that is determined to cause or may cause a problem in maintain full and continuous compliance with this application or the approved registration.

4.5.13.2 §330.225(b) Prohibitions on Waste Unloading Area

The unloading of waste in unauthorized areas is prohibited. The facility will ensure that any waste that is deposited in a unauthorized area will be promptly removed and managed appropriately. The facility will maintain records of material that is removed from the site.

4.5.13.3 §330.225(c) Prohibition on Incoming Waste Streams

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.

4.5.14 §330.227 Spill Prevention and Control

Refer to Contaminated Water Management Plan (Part IV, Attachment 1) for additional details on the management of spills and contaminated water. A summary and layout for the individual containment areas and calculations for secondary containment are included in Part III, Attachment 2.

4.5.15 §330.229 Facility Operating Hours

4.5.15.1 §330.229(a) Specific Operating Hours

The facility may receive, transfer and process waste twenty-four (24) hours per day, (7) seven days per week. The facility may conduct 24/7 operations for maintenance and housekeeping.

4.5.15.2 §330.229(b), (c) and (d) Alternative and Temporary Operating Hours

Not applicable. The facility is authorized to operate 24/7 days per week.

4.5.16 §330.231 Facility Sign

A sign will be conspicuously displayed at the entrance of the facility. The facility sign will measure a minimum of four feet by four feet with letters at least three inches in height stating the following:

- Facility name;
- Type of facility;
- Hours and days of operation;
- Registration number; and
- Facility rules if applicable.

Additional information may be added to the sign per the discretion of facility management. Additional signs, regarding such site rules as speed limits and exclusion of regulated hazardous and unacceptable waste streams, may also be posted.

4.5.17 §330.233 Control of Windblown Material and Litter

Windblown litter is not anticipated as this is a liquid waste processing facility where operations, including off-loading, occur inside the processing building. Additionally, waste is managed through enclosed systems. When windblown litter is found, it will be picked up at least once per day on the days the facility is in operation to minimize unhealthy, unsafe, or unsightly conditions. Additional fencing or screening will not be required due to the nature of the incoming waste.

4.5.18 §330.235 Materials along the Route to the Facility

Since the facility receives liquid wastes in enclosed tanker trucks, spills of waste material along access routes are not expected to occur, and if it occurs, it should be insignificant. Steps will be

taken by the facility personnel in order to help ensure that trucks bringing waste to the site are properly secured in order to prevent any spillage. This includes:

- Checking that the valves are in the correct position before loading, unloading, or moving the vehicle.
- Informing truck drivers about leaks observed in truck valves, hoses or pumps. Also, recommending that discharge ports be equipped with a quick connect end cap, to help prevent leakage from the valve; and
- Each manifested load will be checked for completeness. Any violators whose manifests do not match up will be reported to the TCEQ and to proper law officials. Records will be maintained as identified in 4.5.10.2 §330.219(b) Required Records for Recordkeeping. Roadside inspection(s) for spilled liquids manifested to the site and cleanup will not be conducted unless requested by TxDOT or the City.

4.5.19 §330.237 Facility Access Roads

4.5.19.1 §330.237(a) All Weather Roads

Paved surfaces are provided within the facility for wet weather operations. All-weather surfaces will be maintained to prevent the tracking of mud and debris onto public roadways.

4.5.19.2 §330.237(b) Dust Control

Dust from on-site and other access roadways are not anticipated as on-site and other access roads to the facility are paved.

4.5.19.3 §330.237(c) Access Road Maintenance

All on-site roadways will be maintained on a regular basis to minimize depressions, ruts, and potholes, as appropriate. Off-site access roads and their repairs are under the jurisdiction of the City of Austin and/or TxDOT.

4.5.20 §330.239 Noise Pollution and Visual Screening

The transfer and/or unloading of waste will occur inside the building loading area. Steps will be taken to minimize the amount of noise pollution generated from the site. While the majority of activity will take place within the processing building, steps to reduce noise pollution outside of

the building may include, but is not limited, to turning waste transport vehicles off during loading/unloading.

4.5.21 §330.241 Overloading and Breakdown

The design capacity of the facility will never be exceeded during operation. If the facility receives waste quantities that cannot be processed within a time frame to prevent the creation of odors, insect breeding or vector harboring, additional waste will not be received until the problem conditions are abated. The maximum storage times are identified in Part II, Table 1. The maximum time unprocessed waste will be held on-site is 72 hours. However, waste that is in process may be held longer than 72 hours.

The maximum number, size, type, and function of the equipment to be utilized at the facility based on the estimated waste acceptance rate and other operational requirements are listed in Part III, Tables 1A and 1B. If a major mechanical breakdown or a significant work stoppage occurs which causes the waste storage tanks to become entirely filled, no additional material will be accepted. If there is an extended breakdown that would cause the facility to become inoperable for longer than 24 hours and if this delay would be predicted to cause unprocessed waste to stay on site for more than their approved times as identified in Part II, Table 1, all the incoming material will be diverted to another approved facility.

If the units are operable but the transfer pump, dewatering equipment or the floor drainage system is inoperable, material may be received if storage capacity is available. If there is an extended breakdown, all the incoming material will be diverted to another approved facility.

4.5.22 §330.243 Sanitation

All working surfaces that come into contact with wastes shall be washed down on a weekly basis at the completion of processing. If continual operations are conducted, exposed working surfaces that come in contact with waste material will be swept daily, and washed down at least two times per week. Wash waters used to clean the facility will be captured in a sump and those waters will be collected and processed at the facility. Wash waters shall not be allowed to accumulate on site without proper treatment to prevent the creation of odors or an attraction to vectors. All wash waters shall be collected and disposed of in an authorized manner.

4.5.23 §330.245 Ventilation and Air Pollution Control

4.5.23.1 §330.245 (a) Air Emissions

The facility will not cause or contribute to air pollution as defined in the Texas Clean Air Act. All in-plant driveways and work areas will be cleaned by pressure washing as necessary to obtain maximum control of dust emissions.

4.5.23.2 §330.245(b) Abatement Devices

Any air pollution abatement devices the facility utilizes will be authorized as applicable according to 30 TAC §116 relating to Control of Air Pollution By Permits for New Construction or Modification.

4.5.23.3 §330.245(c) – (f) Odor Control and Ventilation

The facility will be designed and operated to provide adequate ventilation for odor control and employee safety. All activities that could result in the increased odor emissions will be conducted in such a manner that does not create a nuisance conditions. Building openings such as doors, windows, and louvers will be controlled for ventilation and to prevent releases of nuisance odors from leaving the property boundary of the facility. Odor will also be controlled at this facility by minimizing contact between unprocessed waste and air and by following good housekeeping practices. Wastes will be transferred in hoses and pipes and stored in enclosed tanks. Under these conditions, airflow is limited over the surfaces of liquid as the waste is transferred and processed, and odors will not be mixed with large volumes of air and widely distributed in the building or throughout the site. Odor control may also be maintained through the use of a commercially available deodorant such as a biological deodorant or bleach.

Air pollution emission capture and abatement equipment will be maintained and operated according to manufacturer specifications when used.

4.5.23.4 §330.245(g) Recovery of Material

Not applicable.

4.5.23.5 §330.245(h) Exposure of Liquid Waste

Airflow is limited over the surfaces of the liquid waste as it is transferred, unloaded, and processed due to the use of hoses and pipes to transfer waste to enclosed storage tanks.

4.5.23.6 §330.245(i) Mobile Waste Processing Units Not applicable.

4.5.23.7 §330.245(j) Emissions Event Reporting and Recordkeeping

The facility will promptly notify the TCEQ and local air pollution control programs defined in 30 TAC §101.201(a) of any reportable emissions event that in any 24-hour period, results in an unauthorized emission from any emissions point equal to or in excess of the reportable quantity as defined in 30 TAC §101.1(89) (Reportable quantity). For emissions events that are not reportable, records will be maintained as required under 30 TAC §101.201(b).

4.5.23.8 §330.245(k) Controlling Ponded Water

The facility will control any ponded water onsite so that objectionable odors can be dealt with if they occur. Any ponded water within the building will either be pumped dry or swept by a squeegee towards the drains. If necessary, a deodorant will be used. If nuisance odors are found to be passing the facility boundary, the facility operator may be required to suspend operations until the nuisance is abated.

4.5.24 §330.247 Health and Safety

Facility personnel will be trained in the appropriate sections of the facility's health and safety plan. The Site Health and Safety Plan for this facility is included in Part IV, Attachment 3.

4.5.25 §330.249 Employee Sanitation Facilities

Potable water and sanitary facilities are provided for all employees and visitors.



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ATTACHMENTS



ATTACHMENT 1 CONTAMINATED WATER MANAGEMENT PLAN



ATTACHMENT 1 §330.207 CONTAMINATED WATER MANAGEMENT

§330.207(a) Disposal of Liquids

All liquids resulting from the operation of the facility will be disposed of in a manner that will not cause surface water or groundwater pollution. The operator will provide for authorized disposal of wastewaters resulting from managing the waste or from cleaning and washing by discharge to the City sanitary sewer or transport to a wastewater facility. Contaminated water will not be discharged to surface water without specific written authorization.

§330.207(b) Collection of Contaminated Water and Leachate

No contaminated water will be discharged off-site without specific written authorization. Management of discharges will be in accordance with local requirements and all necessary authorizations and approvals will be obtained and retained within the operating record at the facility.

Rainwater contact with municipal solid waste is not anticipated as all operations occur inside the facility building. For storage tanks located outside, contact between rainwater and waste is not anticipated as these tanks are fully enclosed. Loading/unloading and processing areas located inside the facility building will be concrete surfaces and all areas containing wastes have the capacity to contain any spills. The required secondary containment calculations for the Processing Area, Dewatering Area, Offloading Area, and Tank Farm Area are provided in Part III, Attachment 1. Drains, collection sumps, pumps and/or vacuum trucks will be provided to recover any contaminated water for proper disposal.

§330.207(c) Use of Leachate and Gas Condensate

This section is not applicable to this MSW Type V Processing Facility.

§330.207(d) Discharge to a Septic System

This facility will not discharge to a septic system.

§330.207(e) Off-Site Discharge of Contaminated Waters

No contaminated water will be discharged off-site without specific written authorization under Texas Pollution Discharge Elimination System (TPDES) authority.



§330.207(f) Wastewaters Discharges to Treatment Facility

Wastewaters discharged to the sanitary sewer system and a wastewater treatment facility will not:

- 1. Interfere with or pass-through the treatment facility processes or operations,
- 2. Interfere with or pass-through its sludge processes, use, or disposal, or
- Otherwise be inconsistent with the prohibited discharge standards, including 40 Code of Federal Regulations Part 403, General Pretreatment Regulations for Existing and New Source Pollution.

The City of Austin will identify discharge requirements upon issuance of a wastewater permit. The requirements for discharge to the sewer will be met.

§330.207(g) Oil & Grease Concentration in Effluent

The City of Austin will identify discharge requirements upon issuance of a wastewater permit. The requirements for discharge to the sewer will be met.

§330.207(h) Liquid Waste Transfer Facility

Lagoons, open-top storage tanks, open vessels and underground storage units are prohibited at this facility.



ATTACHMENT 2 FIRE PROTECTION PLAN

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ATTACHMENT 2 §330.221(c) FIRE PROTECTION PLAN

This Fire Protection Plan is designed to serve as a guide to aid personnel in the proper procedures/protocols in the event of a fire or other emergency situation.

Liquid Environmental Solutions (LES) will ensure all fire detection/fighting equipment will be in continuous compliance with local fire codes. If local fire codes are changed, the Fire Protection Plan will be revised as needed. The following fire protection plan shall be followed.

I. Fire Prevention Procedures

- ♦ No burning will be permitted at the site.
- ♦ No smoking will be allowed in the waste storage areas.

II. Source of Fire Protection

- ◆ 2012 International Fire Code as adopted by the City of Austin
- ◆ The City of Austin will be a primary source of fire protection.

III. Employee Training and Safety Procedures

- ♦ All personnel will be properly trained on fire extinguisher use and capabilities.
- All personnel will be properly trained on the general rules for fighting fires.

IV. General Rules for Fire Fighting

◆ Call 911 to notify the Fire Department and give the following prepared information:

Name of Company: Liquid Environmental Solutions Address of Company: 7005 Burleson Road, Austin, Texas Nearest Cross Street(s): Between Smith School Rd and McKinney Fall's Pkwy



- Alert other facility personnel and tenants so they may evacuate the onsite buildings using the closest exit. If safe, shut all doors, and turn off the ventilation system to prevent spread of fire.
- Personnel are to assemble at a pre-designated site, not closer than 50 ft. from the building.
- Assess extent of fire, possibilities for the fire to spread, and alternatives for extinguishing the fire.
- If it appears the fire can be safely fought with available fire fighting devices, attempt to contain or extinguish the fire, until the Fire Department arrives.
- ◆ If a fire extinguisher is to be used, the PASS method will be utilized: Pull pin, Aim at base of fire, Squeeze trigger, and Sweep from side to side.
- Upon arrival of Fire Department personnel, maintain access to the facility by having gates opened. Alert/direct fire department to the fire and provide assistance.
- Do not attempt to fight a fire alone.
- Do not attempt to fight a fire without adequate personal protective equipment.
- Be familiar with the uses and limitations of firefighting equipment.



ATTACHMENT 3 SITE HEALTH AND SAFETY PLAN



ATTACHMENT 3 §330.247 SITE HEALTH AND SAFETY PLAN

I. Introduction

This plan has been prepared to provide guidance for a safe work environment and a guideline in the event an emergency situation arises during the normal course of work for Liquid Environmental Solutions (LES) employees while working at the Burleson Road facility. All employees will be instructed in safe operating procedures and emergency preparedness.

II. Training

Each employee will be instructed by management as to proper procedures for performing the specific job for which they were hired during the first thirty (30) days of employment. The instruction will include a tour of the entire facility to familiarize themselves with the location of the following:

- 1. Fire extinguishers,
- 2. Telephones,
- 3. Emergency telephone numbers, and
- Locations of safety equipment.

III. Safety and Awareness Meetings

Management will conduct monthly safety meetings to review safety procedures and refresh employees on the importance of safety in the workplace.

IV. Basic Personal Protective Equipment

Personnel protective equipment may include the following:

- 1. Safety glasses,
- 2. Face mask,
- 3. Gloves (latex and kevlar),



- 4. Coveralls, and
- Non-skid footwear.

V. Basic Elements

Below is a list of proper safety procedures to be followed during daily operations.

Shift Supervisor

- 1. Watch for trucks entering the facility.
- 2. Wear gloves while working with waste.
- 3. Inspect loads as outlined in the Site Operating Plan.
- 4. Lock facility gates after closing hours.
- 5. Manage receiving floor.
- 6. Use common sense.

Facility Supervisor / Facility Manager

- 1. Watch for trucks unloading.
- 2. Wear gloves while working with waste.
- 3. Be cautious around operating equipment.
- 4. Lock facility gates after closing hours.
- 5. Use common sense.
- 6. Check fire extinguishers at least annually to insure proper working order.

VI. Emergency Procedures

In the event of an emergency, it may be necessary to seek outside assistance from other agencies. Primary emergency phone numbers are listed below:



• Fire 911

• Police 911

Ambulance 911

General procedures to be followed in the event of an emergency are as follows:

- An employee detecting an emergency should notify 911 and then the LES
 emergency coordinator, or designee. Until the emergency coordinator or
 designee arrives, the employee should direct site personnel and visitors to
 evacuate if there is imminent risk to their personal safety.
- The employee may administer emergency first aid, if qualified, if someone has been injured. If the injury is moderate, arrangements to transport the injured person to the nearest hospital will be made. If the injury is severe, emergency personnel at 911 will be contacted. Emergency care will be administered until the ambulance arrives.
- In the event of a fire or explosion, the employee detecting the fire or explosion
 will notify 911 and the LES emergency coordinator, or designee, describing the
 location and extent of the fire or explosion and any need for immediate
 assistance for first aid or fire containment. The employee must be prepared to
 assist the emergency coordinator and/or response team.