

#### Texas Commission on Environmental Quality Waste Permits Division Correspondence Cover Sheet

Date: <u>May 26, 2023</u> Facility Name: <u>South Texas DeWatering Facility</u> Permit or Registration No.: <u>2417</u> Nature of Correspondence:

- Initial/New
- Response/Revision to TCEQ Tracking No.: <u>28154406</u> (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Applications	Reports and Notifications
New Notice of Intent	Alternative Daily Cover Report
Notice of Intent Revision	Closure Report
$\square$ New Permit (including Subchapter T)	Compost Report
New Registration (including Subchapter T)	Groundwater Alternate Source Demonstration
🗌 Major Amendment	Groundwater Corrective Action
Minor Amendment	Groundwater Monitoring Report
Limited Scope Major Amendment	Groundwater Background Evaluation
Notice Modification	Landfill Gas Corrective Action
Non-Notice Modification	Landfill Gas Monitoring
Transfer/Name Change Modification	Liner Evaluation Report
Temporary Authorization	🗌 Soil Boring Plan
Uvoluntary Revocation	Special Waste Request
Subchapter T Disturbance Non-Enclosed Structure	Other:
Other:	

#### Table 1 - Municipal Solid Waste Correspondence

#### Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
□ New	Annual/Biennial Site Activity Report
Renewal	CPT Plan/Result
Post-Closure Order	Closure Certification/Report
🗌 Major Amendment	Construction Certification/Report
Minor Amendment	CPT Plan/Result
CCR Registration	Extension Request
CCR Registration Major Amendment	Groundwater Monitoring Report
CCR Registration Minor Amendment	🗌 Interim Status Change
Class 3 Modification	Interim Status Closure Plan
Class 2 Modification	Soil Core Monitoring Report
Class 1 ED Modification	Treatability Study
Class 1 Modification	Trial Burn Plan/Result
Endorsement	Unsaturated Zone Monitoring Report
Temporary Authorization	U Waste Minimization Report
Voluntary Revocation	Other:
335.6 Notification	
Other:	



INTERA Incorporated 9600 Great Hills Trail, Suite 300W Austin, Texas 78759 USA 512.425.2000

May 26, 2023

Mr. Cody Seal Project Manager Municipal Solid Waste Permits – MC 124 Texas Commission on Environmental Quality 12100 Park 35 Circle, Building F Austin, Texas 78753

#### RE: Technical Notice of Deficiency Email Dated May 2, 2023 – Tracking No. 28154406 MSW Permit No. 2417 – South Texas Dewatering Facility

Dear Mr. Seal:

On behalf of South Texas Dewatering, INTERA Incorporated (INTERA) is submitting responses to your Technical Notice of Deficiency (NOD) email dated May 2, 2023, regarding the Type V permit application for the South Texas Dewatering Facility in Alice. The enclosed documents address the NOD items listed in your email. The following information is included in this response:

- List of NOD comments immediately followed by a response for each comment.
- List of enclosures and replacement page instructions.

#### May 2, 2023 NOD Comments and Responses

1. Provide a diagram showing the access routes and the expected flow of traffic within the facility.

Response: The enclosed Figure 2 (Topographic Site Location Map) has been revised to show the access routes to the facility. The enclosed Figure 9 (Site Layout Plan) has been revised to show the expected flow of traffic within the facility.

2. Provide more details about the parametric limitations of each type of waste to be managed by the facility.

### Response: Revised Sec 4.1.3 on page 4-4 contains a reference to parametric limitations of any waste.

3. Provide more details on how and where the effluent produced from processing operations and other discharged liquids will be disposed of.

### Response: Revised Sec 3.1.2.4 on page 3-5 includes other discharged liquids and lists several types of facilities which may have an authorization to accept the effluent.

4. Provide a description of how noise pollution and adverse visual impacts will be controlled if it occurs.

Response: These items are required only for Transfer Stations, but processing is in a building and set back about 200' from the road.

5. Provide the third-party processors quote, referred to in the Closure Cost Estimate, for the disposal of liquid waste at the rate of \$0.15/gal. Update to include the washdown water to be disposed of in the same manner as the other liquid waste are to be disposed of during closure.

# Response: Appendix 5 now contains a quote for the liquid waste/washdown water disposal, and the closure cost estimate uses this cost for both types of wastewater. Refer to Appendix 5 (revised pages App. 5-5 and 5-6 and new page App. 5-7).

6. Provide a biological assessment of whether the facility is located within an endangered species range and describe how the facility will be designed to protect endangered species.

### Response: Section 2.9 on pages 2-10 and 2-11 and Section 3.1.4 on page 3-7 have been revised to include additional information to address this.

7. Provide the review letter from the Texas Historical Commission documenting compliance with the Natural Resources Code, Chapter 191, Texas Antiquities Code.

#### Response: This letter has been provided for inclusion in Appendix 6.

8. Provide an explanation of the difference between "Asphalt Paving" and "Asphalt Pavement" in figure 9.

#### Response: The enclosed Figure 9 has been revised to show only asphalt paving.

9. Acknowledge that the owner & State shall have access during life of the facility and during closure.

### Response: This information is contained in the existing Property Owner Affidavit in Appendix 2 that was previously submitted.

10. Provide a list of all solid waste sites in all states, territories, or countries in which the owner or operator has a direct financial interest. The type of site shall be identified by location, operating dates, name, and address of the regulatory agency, and the name under which the site was operated. If there are none please indicate so.

### Response: This information is contained in the existing Appendix 2 Evidence of Competency table that was previously submitted.

11. Provide the names of principals and supervisors of the owner's or operator's organization with previous affiliations with other organizations involved in solid waste activities. If there are none please indicate so.

### Response: This information is contained in the existing Appendix 2 Evidence of Competency table that was previously submitted.

12. Indicate the airport in Figure 1.

#### Response: A callout was added to further label the airport in Figure 1 (Vicinity Map).

13. Provide more information about the type of water connections and the types of equipment used for cleaning.



#### Response: Section 3.1.3 on page 3-7 is revised to include this information.

14. Acknowledge that wastewaters discharged to a facility permitted under Texas Water Code, Chapter 26 must not interfere with or pass-through the treatment facility processes.

#### Response: Revised Section 4.1.7 on page 4-8 contains this information.

15. Indicate that the daily effluent design standard for oil and grease concentration leaving the facility and entering a public sewer system shall not exceed 200 milligrams per liter, the concentration established in the wastewater discharge permit pretreatment limit or the concentration established by the treatment facility permitted under Texas Water Code, Chapter 26, the National Pollutant Discharge Elimination System, or the limits established in 30 TAC §330.207, if the discharge points do not require compliance with locally set limits.

#### Response: Revised Section 4.1.7 on page 4-8 contains this information.

16. Describe the types of coverings used to help contain loaded solids and how covering practices of waste hauler vehicles will be encouraged.

# Response: The last paragraph of Section 4.1.6 on the bottom of page 4-7 has been revised so containers are described as tarped onsite and during transport. Incoming wastes arrive in haulers' enclosed tanker trucks.

17. Provide more information about buildings used at the facility including the construction material and description of the sides/walls.

Response: In revised Section 4.2 on page 4-8, processing buildings are described as enclosed and construction materials are described.

#### List of Enclosures and Replacement Page Instructions

Enclosed are an original and two copies of the following:

- 1. Sealed and signed replacement Cover Page for Application Document that should replace the current cover at the front of the document.
- 2. Sealed and signed replacement Table of Contents pages iv and v that should replace the current pages iv and v.
- 3. A signed and notarized Part I Form Signature Page to replace the current Signature page.
- 4. Sealed and signed replacement Cover Page for Part II that should replace the current Part II Cover Page.
- 5. Replacement Part II pages 2-10, 2-11, and 2-12 that should replace current pages 2-10, 2-11, and 2-12. A new page 2-13 is included due to one sentence being pushed to the top of that page because of a change on a previous page.
- 6. Sealed and signed Cover Page for Part III that should replace the current Part III Cover Page.
- 7. A replacement Part III page 3-5 that should replace the current Part III page 3-5.
- 8. Replacement Part III pages 3-7 and 3-8 that should replace the current Part III pages 3-7 and 3-8.



- 9. Sealed and signed Part IV Cover Page that should replace the current Part IV Cover Page.
- 10. Replacement Part IV pages 4-4 and 4-5 that should replace the current Part IV pages 4-4 and 4-5.
- 11. Replacement Part IV Pages 4-7 through 4-23 to replace the current Part IV pages 4-7 through 4-23.
- 12. Replacement Figure 1 to replace the current Figure 1.
- 13. Replacement Figure 2 to replace the current Figure 2.
- 14. Replacement Figure 9 to replace the current Figure 9.
- 15. Sealed and signed Appendix 5 pages App. 5-5 and App. 5-6 to replace current Appendix 5 pages App. 5-5 and App.5-6.
- 16. A new Appendix 5 page App. 5-7.
- 17. Correspondence from the Texas Historical Commission that should be placed at the end of Appendix 6.

One marked/redlined copy of the application cover pages and changes to the text in Parts II, III, and IV is also included.

An unmarked copy is also being mailed to the Waste Section Manager of the TCEQ Region 14 Office.

We appreciate your review of this application. Please contact me via email at <u>jglaser@intera.com</u> or via phone at 512.425.2058 if you have any questions.

Sincerely,

**INTERA** Incorporated

ull Slaser

Jeff Glaser, P.E. Principal Engineer

Enclosure

cc: Mr. Howard Adams Mr. Brian Dudley, P.E. TCEQ Region 14 Waste Section Manager



### SOUTH TEXAS DEWATERING FACILITY, ALICE, JIM WELLS COUNTY, TEXAS MSW PERMIT NO. 2417

**TCEQ MSW Type V Permit Application** 

#### Prepared for:

South Texas DeWatering LLC P.O. Box 721005 McAllen, TX 78504

#### Prepared by:



INTERA Incorporated 9600 Great Hills Trail Suite 300W Austin, Texas 78759 This document is issued for permitting purposes only.



J. Jeffrey Glaser, P.E. INTERA Incorporated Registered Engineering Firm F-4722

Permit Application December 12, 2022 Revision 1 (Admin NOD) January 17, 2023 Revision 2 (Technical NOD) May 26, 2023



3.6	NON APPLICABLE REGULATORY SECTIONS
4.0	SITE OPERATING PLAN, 330.65(a) and (d) 4-1
4.1	WASTE ACCEPTANCE, DISPOSAL AND ANALYSIS 330.203, 330.205, and 330.207
4.1.1 4.1.2 4.1.3 4.1.4 4.1.5 4.1.6 4.1.7	Authorized Wastes4-1Prohibited Wastes4-3Waste Pre-Approval and Testing4-4Waste Acceptance Procedures4-5Processing Facility Operations Waste Analyses4-5Waste Storage and Disposal4-6Contaminated Water Management, 330.2074-8
4.2	STORAGE CONTAINER REQUIREMENTS 330.209 and 330.211
4.3	RECORDKEEPING AND REPORTING 330.219
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4.4	FIRE PROTECTION PLAN, 330.221
4.5	SITE ACCESS AND CONTROL 330.223 and 330.237
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4.10	CONTROL OF WINDBLOWN MATERIAL AND LITTER 330.233 4-18
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4.12	EQUIPMENT INSPECTION AND CONTINGENCY PLANS FOR OVERLOADII AND BREAKDOWN 330.241	NG -19
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4.17	NON APPLICABLE REGULATORY SECTIONS 4-	-22

#### Signature Page

#### Site Operator or Authorized Signatory

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Howard A	\dams	Title:	
Email Address:	stwwrgv@aol.com	,	
Signature:	Ð	Date: 5/24/23	

#### **Operator or Principal Executive Officer Designation of Authorized Signatory**

To be completed by the operator if the application is signed by an authorized representative for the operator.

I hereby designate \_\_\_\_\_\_\_\_ as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Operator or Principal Executive Officer Name:	
Email Address:	
Signature:	Date:
Notary	
SUBSCRIBED AND SWORN to before me by the said	loward Adams
On this <u>24</u> day of <u>May</u> , <u>2023</u>	
My commission expires on the $02$ day of MM	,2026
Virily Ontra	
Notary Public in and for	NAILA ORTIZ
<u> </u>	Comm. Expires 05-02-202 Notary ID 133738311

Note: Application Must Bear Signature & Seal of Notary Public

### SOUTH TEXAS DEWATERING FACILITY

Part II Facility and Area Conditions and Characteristics

#### Prepared for:

South Texas DeWatering LLC P.O. Box 721005 McAllen, TX 78504

#### Prepared by:



INTERA Incorporated 9600 Great Hills Trail Suite 300W Austin, Texas 78759



J. Jeffrey Glaser, P.E. INTERA Incorporated Registered Engineering Firm F-4722

December 12, 2022 Revision 1 (Admin NOD) January 17, 2023 Revision 2 (Technical NOD) May 26, 2023



K, L, O or T. In addition, stormwater discharges from the facility are not subject to federal categorical effluent limitations for stormwater in 40 CFR Subchapter N (Parts 400-471), and the facility has not been designated by the TCEQ Executive Director as requiring coverage under Sector AD (Miscellaneous Industrial Activities). Therefore, this facility is not a category of industrial activity that is regulated by, and its operation will not require authorization under, the TPDES MSGP. However, if current requirements change such that TPDES permitting is required, Wastewater Residuals Management LLC will obtain the appropriate permit coverage, as certified in Appendix 2.

Small quantities of fresh to moderately saline water from the Lissie Formation is present in some wells located in eastern Jim Wells County. Groundwater from the Goliad Formation, located beneath the Lissie, is the primary aquifer for the area. The Goliad yields small to large quantities of fresh to slightly saline groundwater. The Goliad has a maximum thickness of 1,100 feet (Regional Water Supply Study – Duval and Jim Wells Counties, Texas, October 1996). A nearby and unused City of Alice water well was drilled to a depth of 896 feet (Texas Water Development Board Groundwater Data Viewer). According to records for the well, the well was screened in the Goliad sand with a producing interval between 340 to 896 feet below ground surface.

#### 2.8 FLOODPLAINS AND WETLANDS [330.61(m), 330.547, and 330.553]

The site is not located within the 100-year floodplain according to the Federal Emergency Management Agency Flood Insurance Rate Map for Jim Wells County, Panel 240D (Effective August 15, 2017). The FEMA Map depicting the site and surrounding area is provided as Figure 6. The facility is not located on or adjacent to any wetlands. Prior to facility development, the site was operated by Simons Petroleum.

#### 2.9 ENDANGERED SPECIES COMPLIANCE [330.61(n) and 330.551]

Previously, the site was operated by Simons Petroleum as a bulk petroleum liquids distribution company. The site is completely paved or mowed and has contained a building and commercial activity since before 1985. The facility and its operation will not result in the destruction or adverse modification of the critical habitat of endangered or threatened species. The facility will not cause

or contribute to the taking of any endangered or threatened species.

The Texas Parks and Wildlife Department's *Rare, Threatened, and Endangered Species of Texas by County* website was researched, and its records indicated 64 listed rare, threatened, or endangered species as occurring in Jim Wells County, Texas. They included 4 amphibians, 13 birds, 1 fish, 14 mammals, 3 insects, 1 mollusk, 10 reptiles, and 18 plants. Habitat conditions were evaluated and compared to the preferred habitat of the species known or having historically occurred in Jim Wells County. The 3.277-acre facility is in an industrial area within the City of Alice and would not be a preferred habitat of the listed species. The site has been utilized for industrial purposes for over 35 years and is currently surrounded by industrial or commercial facilities. Some trees are located within the fenced facility. There are currently no plans to remove any trees.

# 2.10 COUNCIL OF GOVERNMENT REVIEW 330.61(p), REVIEW OF APPLICATION BY GOVERNMENTAL AGENCIES 39.103 (c)

The Coastal Bend Council of Governments was provided with Parts 1 and 2 of this application and asked for a determination of conformance with the Regional Solid Waste Plan (See Appendix 6). Any response received will be included in the facility's Operating Record. The site is located within the jurisdiction of the City of Alice, Jim Wells County. The Mayor, County Judge and Health Authority are listed below:

Mayor Cynthia Carrasco P.O. Box 3229 Alice, TX 78333 Juan Rodriguez – Jim Wells County Judge

200 N. Almond Street, Ste. 101 Alice, TX 78332

**Public Health Region 11** Emilie Prot, Regional Medical Director 601 W. Sesame Dr. Harlingen, TX 78550

#### 2.11 EASEMENTS AND BUFFER ZONES [330.543]

A 50-foot buffer zone exists between the permit boundary and waste loading, storage, and processing areas except along the boundary east of the operations area, where a 28 ft buffer exists as shown on Figure 9.

A full 50-foot buffer zone along the east boundary near the liquid processing facilities is not needed for access to the waste management areas at the STD facility. In accordance with 30 TAC §330.543(b)(1), safe passage for firefighting and other emergency vehicles is provided by the main entrance to the facility and pavement between the operations area and east boundary, which allows for access to either side of the operations area. STD seeks TCEQ approval for the less than 50-foot buffer zone along the east boundary of the site.

There is a 25 ft lead track easement east-west across middle of the tract that is a vestige of a unused provision for a rail spur to a now-abandoned rail main line. Industrial buildings have been constructed on the spur alignment on nearby lots. There is no processing planned in this area, and there are no other easements on the facility property.

#### 2.12 NON-APPLICABLE REGULATORY SECTIONS

The following sections of the MSW regulations are not applicable to the subject facility.

- §330.61(b)(1)(B and C), waste acceptance requirements applicable only for transfer stations and landfills;
- §330.61(d)(3), applicable only for facilities with monitor wells, which is not this facility;
- §330.61(d)(7), for screening. This facility does not require screening since the processing occurs inside a building and waste is not visible.
- §330.61(d)(9), applicable only for landfill units;
- §330.61(i)(5), applicable only for landfill units;
- §330.61(j)(2), (3), and (4), applicable only for landfill units;
- §330.61(n)(2), applicable only for landfill units;
- §330.543(b)(2) and (3), applicable only for landfill units and alternative buffer zone requirements;
- §330.545, airport requirements applicable only at landfills;
- §330.549, applicable only for facilities located over recharge zone of the Edwards Aquifer, which this facility is not;
- §330.553(b), is not applicable, because the facility is not located in wetlands;
- §330.555(a), applicable only for landfills and waste disposal in fault areas;
- §330.557, applicable only for landfills in seismic impact zones;
- §330.559, applicable only for landfills in unstable areas;
- §330.561, applicable only for landfills in coastal areas; and

• §330.563, applicable only for Type I and Type IV Permit issuance to landfills.

### SOUTH TEXAS DEWATERING FACILITY

Part III Site Development Plan

#### Prepared for:

South Texas DeWatering LLC P.O. Box 721005 McAllen, TX 78504

#### Prepared by:



INTERA Incorporated 9600 Great Hills Trail Suite 300W Austin, Texas 78759



December 12, 2022 Revision 2 (Technical NOD) May 26, 2023

Unit Name	Maximum Number	Maximum Size	Materials of Construction	Function
PHASE II (ADDITIONAL EQUIPMENT)				
9. Heated Brown Grease Holding Tank	optional	12,000 gal	Steel	Storage of recovered grease for recycling
10.Waste Storage/Processing Tanks	Up to 4 additional	20,000 gal/each	Steel	Waste and Effluent Storage, Wastewater Buffering
11.Polymer Injection System	1 additional	1000 gal	HDPE or fiberglass	flocculant storage and injection into waste stream
12.Belt Press with conveyor and ancillary equipment for operation	optional	Typically 2.0 meter		DeWatering of the waste
13.Processing Unit	1 additional	30 cy, nominal	Steel	DeWatering of waste and transfer of solids from facility
14.Dissolved Air Floatation (DAF) Unit	optional		Steel	Wastewater pretreatment

All concrete slabs, curbs and walls contain steel reinforcement. A representative storage or processing tank and rolloff processing unit are illustrated in Appendix 3.

### 3.1.2.4 Storage, Analysis and Disposition of Processed Materials 330.63(b)(2)(G) and (H), 330.63(d)(1)(C)

Processing at the facility separates the liquid wastes into wastewater and solids which will be stored and removed from the site as described below. The maximum time that unprocessed material will be allowed to remain on-site is 72 hours. The average time that unprocessed material will remain on-site is estimated to be 24 hours.

#### Processed Wastewater

Effluent from the processing operation and other discharged liquids will be discharged to the City sewer in accordance with its requirements or transported to another authorized treatment or disposal facility such as a wastewater treatment plant or processing facility, compost facility, or anerobic digester.

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.

Further description of waste sampling and testing is contained in Section 4.1.3

#### 3.1.3 Sanitation and Water Pollution Control, 330.63(b)(3) AND (4)

The processing takes place at spill-contained paved surfaces that prevent surface water runoff onto, into and off of the processing area. The processing equipment will be inspected regularly and cleaned as required to minimize solids loading. Wash waters will not be allowed to accumulate on site without proper treatment to prevent the creation of odors or an attraction to vectors.

Pressurized water connections and washdown equipment, including hoses, sprayers and pressure washers, will be provided for the process and unloading areas. Slabs and walls adjacent to unloading areas, operating areas and equipment which require frequent washdown will be constructed of asphaltic concrete, reinforced concrete, steel or other non-porous hard-surfaced material.

All unloading areas, waste storage tanks, processing areas and transport staging slabs will be in areas with spill containment. There will be no surface water discharges from these areas. The slabs will be designed to allow collection of any minor spills and facility washdown water, which will then be routed to the sewer or through the processing equipment. All disposal of process liquids will be in a manner that will not cause surface or groundwater pollution.

The facility will not discharge contaminated water without specific written authorization.

#### 3.1.4 Endangered Species Protection, 330.63(b)(5)

No special design is required for endangered species protection at the site. Trees at the site will be left in place. See Section 2.9 for additional information.

#### 3.2 SITE DRAINAGE, 330.63(c) and 330.303

Surface water drainage at the facility will be controlled to minimize surface water running into and off the operations area. The run-on and runoff associated with the 25-year, 24-hour rainfall event will be controlled so there is no discharge of waste caused by the associated stormwater

#### conditions.

No levees are required since the facility is not located within the 100-year floodplain.

# 3.3 WASTE MANAGEMENT UNIT DESIGN AND SPILL PREVENTION/CONTROL, 330.63(d)(1)(A-c) and 330.227

Unprocessed and processed waste liquids will be stored in enclosed tanks at the facility. The number and size of tanks used for processing and storage have been selected to provide the facility with the capacity to process all the waste received each day. With equipment that has a maximum Phase 2 process capacity of 180,000 gal/day (as described in Section 4.1.6) or 110% of the 164,000 gal/day maximum waste acceptance rate, the holding time of solid waste is minimized. The liquid waste, which may be capable of creating public health hazards or nuisances, will be stored in tanks and processed or transferred promptly. It will not be allowed to result in nuisances or public health hazards.

Anticipated processing rates and storage times for unprocessed and processed materials are described in Sections 3.1.2.1, 3.1.2.4 and 4.1.6.

#### Spill Prevention and Control

All liquid waste unloading areas, waste storage tanks, and processing areas will contain curbs and spill containment capacity. No stormwater runs onto the slabs, and no contaminated stormwater or wastewater will drain off the slabs to surrounding ground and leave the facility.

Each area has been designed to contain a spill equal to the capacity of the largest tank within the area along with managing the 25-year, 24-hour rainfall event storm volume. The calculations for spill containment are included in Appendix 4 of this report.

<u>Storage tank Area</u> -- The storage tank area contains a paved slab and perimeter walls that have sufficient capacity to contain a spill from the largest storage tank of 21,000 gallons and the 25-year, 24-hour storm if no roof will cover the area. Calculations in Appendix 4 show that sufficient spill containment can be provided with 31-inch walls if no roof is provided or 20-inch walls with a roof.

3-8

### SOUTH TEXAS DEWATERING FACILITY

#### Part IV Site Operating Plan

#### Prepared for:

South Texas DeWatering LLC P.O. Box 721005 McAllen, TX 78504

#### Prepared by:



INTERA Incorporated 9600 Great Hills Trail Suite 300W Austin, Texas 78759



J. Jeffrey Glaser, P.E. INTERA Incorporated Registered Engineering Firm F-4722

December 12, 2022 Revision 2 (Technical NOD) May 26, 2023

#### 4.1.3 Waste Pre-Approval and Testing

All waste sources must be evaluated by facility staff and pre-approved prior to waste delivery to the facility except grease trap, septic, raw sewage, lift station, chemical toilet and food wastes. Shipments of these wastes are still subject to inspections and must be properly manifested. Pre-approval of these wastes is not deemed necessary because the characteristics of these nonhazardous wastes are well known and the wastes are easily recognizable by staff inspecting the arriving waste.

For waste pre-approval, the waste generator must submit a Liquid Waste Profile Form, waste sample and analytical information consistent with the following, except for the wastes listed in the above paragraph. With the Form, the generator is required to submit accurate descriptions of the waste, all relevant information necessary for proper material characterization and identification of known and suspected hazards. The generator also certifies that the waste is non-hazardous and does not meet the definition of a hazardous waste as outlined in 40 CFR Part 261 Subpart C (characteristic hazardous wastes) and Part 261 Subpart D (listed hazardous wastes). An example of the Form is included on Appendix 2, and all analysis records shall be maintained in the facility operating record for no less than three years.

A waste sample provided by the generator assists the facility in evaluating waste characteristics such as physical appearance, odor, pH, and percent solids. These characteristics are used to compare incoming waste shipments to the wastes originally approved in order to limit the risk of unauthorized wastes arriving at the facility. A waste sample also allows the facility to evaluate the treatability of the waste.

Waste information submitted to the facility, including analytical data and process knowledge, is used in the determination of whether the waste may be hazardous and to support the facility's decision whether it may be appropriately accepted. The parameters for hazardous waste determination include ignitability, corrosivity, reactivity, and toxicity and must be derived from a sample that is representative as defined in 40 CFR 261 -- Appendix 1 or by using an equivalent method. Parameters that would render a waste as unacceptable are those contained in the rules referenced in Section 4.1.2. The facility may opt to use more strict parameters and material characteristics that promote good operations. The facility will select constituents requiring analysis based upon the generator-supplied information and any other relevant and available

information. Some of the required analyses may be performed at the facility. An outside laboratory may be contracted for needed analytical testing not performed at the facility.

The Liquid Waste Profile Form information and process knowledge review and verification may occasionally provide sufficient information to make a waste characterization and waste acceptance determination without further analytical data. Examples are lint trap waste from a laundromat without dry cleaning activities or stormwater culvert cleanout water from a site without industrial or chemical handling activity.

Liquid Waste Profile Forms will be renewed at least every two years. Additionally, all changes occurring in the character of the waste (i.e., changes in the process or new analytical results) are to be identified by the generator and disclosed to the facility.

#### 4.1.4 Waste Acceptance Procedures

The procedures for acceptance or rejection of incoming waste streams are as follows.

- 1. Except for certain wastes as listed in 4.1.3, a Liquid Waste Profile Form must have been submitted and accepted by the facility. The transporter may then deliver waste to the facility for processing.
- 2. Each arriving load will be observed by facility staff for appearance and odor prior to unloading.
- 3. The manifest or trip ticket for the incoming material will be collected and its information verified as described in Section 4.3.2.
- 4. Wastewater that has failed any inspection procedures will be rejected and not allowed to unload at the facility. Any rejected loads will be documented and kept with the manifest records.

#### 4.1.5 Processing Facility Operations Waste Analyses

In accordance with 30 TAC 330.203 (c), analyses for wastes received will be made for benzene, lead, and total petroleum hydrocarbons (TPH). Grit trap wastes will be analyzed annually for BOD, total suspended solids, benzene, lead and TPH. Sampling and analyses conducted to satisfy this regulatory requirement will use EPA-approved methods, with the results maintained in the operating record.

gallon capacity each), or 62,000 gallons with the addition of a 20,000 gallon (maximum capacity) storage tank in Phase II.

The design capacity of the processing units exceeds the maximum waste acceptance rate for each Phase. The capacity is based on working one shift with each of the units processing 2 batches daily. Each batch processes about 25,000 gallons of waste. Thus, the daily total processing capacity is 100,000 gal/day for Phase I (2 units x 2 batches x 25,000 gal/batch).

For Phase II, two processing tanks are added, each of which can process two 20,000 gallon batches daily. Processing capacity is increased by 80,000 gallons/day to 180,000 gallons/day in Phase 2 (2 processing units x 2 batches x 25,000 gallons/batch + 2 processing tanks x 2 batches x 20,000 gallons/batch).

Typically, the dewatered material will be on-site no more than 72 hours. Post-processing holding time will not exceed 7 days unless the material is reprocessed. The solids content of the wastes being processed will vary from 1% to over 25%, depending on waste type and source. An average 12% solids content can be conservatively assumed for an estimate of the maximum amount of solids which may be produced daily from a mixed waste stream. Assuming an average solids content of 12%, the quantity of processed waste solids expected at maximum production is 97 cy/day (wastes processed = 164,000 gallon/day  $\rightarrow$  21,925 cf/day x 0.12 typical avg. solids content = 2,631 cf/day = 97 cy/day).

If brown grease is recovered from the process, it may be stored in holding tanks for a period not longer than 30 days. The grease can be recycled into energy related products or other beneficial use products.

Any loaded solids containers will be tarped at the site and during transport. The solids will be taken to an authorized compost facility, processor or one of the permitted MSW landfills located in the area. If solids will go to a compost facility, grit trap waste will either be handled separately from other wastes, or it will be tracked through the process so that recovered grit trap solids or liquids will not be transported to a compost facility. Permitted MSW Landfills and compost facilities in the San Antonio and Corpus Christi areas have indicated they can manage wastes that will come from this facility.

#### 4.1.7 Contaminated Water Management, 330.207

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 sewer or transport to a wastewater facility. Discharge to a septic system is prohibited.

Wastewaters discharged to a facility permitted under TWC, Ch 26 must 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 daily effluent design standard for oil and grease concentration leaving the facility and entering a public sewer system shall not exceed 200 mg/l, the concentration established in the wastewater discharge permit, pretreatment limit or the concentration established by the treatment facility permitted under TWC, Ch 26, the NPDES, or limits in 30 TAC 330.207, if the discharge points do not require compliance with locally set limits.

Rainwater contact with municipal solid waste will be controlled. All loading/unloading and processing areas will be paved surfaces and all areas containing wastes have the capacity to contain spills. Drains, collection sumps, pumps and/or vacuum trucks will be provided to recover contaminated water for proper disposal. Contaminated water will not be discharged without specific written authorization.

#### 4.2 STORAGE CONTAINER REQUIREMENTS 330.209 and 330.211

All processing buildings will be enclosed, and tanks and containers storing wastes and recovered material at the site will be enclosed or covered so that they do not constitute a fire, safety or health hazard or provide food or harborage for animals and vectors. Slabs and walls adjacent to unloading areas, operating areas and equipment which require frequent washdown will be constructed of asphaltic concrete, reinforced concrete, steel, or other non-porous hard-surfaced material.

Reusable waste containers will be maintained in a clean condition so that they do not constitute a nuisance and to retard the presence of vectors. If a vector problem develops, a pest control service will be consulted, and actions taken to eliminate the problem.

Control of odors, vectors, and windblown waste from the storage area will be maintained by keeping the waste containers covered and immediately cleaning up any spills on the concrete surfaces.

Storage containers will be provided of an adequate size and strength, and in sufficient numbers, to contain all solid waste that the facility generates in the period between collections.

Non-reusable containers must be of suitable strength to minimize animal scavenging or rupturing during collection operations. Containers to be emptied manually must be capable of being serviced without the collector coming into physical contact with the solid waste, and containers to be mechanically handled must be designed to prevent spillage or leakage during storage, handling and transport.

#### 4.3 RECORDKEEPING AND REPORTING 330.219

A copy of the permit, the approved copy of the permit application, the approved site operating plan, and any other required plan and documents will be maintained at the facility or offsite at the main company office at all times. After completion of new construction, an as-built set of construction plans and specifications will be maintained in the records. Reports required by 330.675 relate to quarterly and annual waste reporting and will be submitted to the Executive Director as applicable. These documents will be considered as part of the operating record for the facility.

#### 4.3.1 Operating Record

The following documents and records will be promptly recorded and retained either on site or offsite at the main company office (currently in McAllen, TX) by the owner/operator in the facility's Operating Record during the life of the facility and during closure:

#### **Operating Record**

Reco	rds To Be Maintained	Rule Citation
1.	Application-related documents as described above	§330.219(a)
2.	All location-restriction demonstrations.	§330.219(b)(1)
3.	Inspection records and training procedures.	§330.219(b)(2)
4.	Closure plans and any monitoring, testing, or analytical data relating to closure requirements.	§330.219(b)(3)
5.	All cost estimates and financial assurance documentation relating to financial assurance for closure.	§330.219(b)(4)
6.	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.	§330.219(b)(5)
7.	All documents, manifests, shipping documents, trip tickets, etc., involving special waste. Waste profile and analysis records are kept for three years.	§330.219(b)(6)
8.	Any other document(s) as specified by the approved permit or by the executive director.	§330.219(b)(7) §330.675
9.	Trip tickets (manifests) of §312.141 wastes received (kept for five years as described in Section 4.3.2, "Manifest Retention"); Other waste manifests, Profile Forms and analysis records (kept three years).	§330.219(b)(8)
10.	Alternative schedules and notification requirements, if approved by the executive director.	§330.219(g)
11.	Personnel operator licenses	§330.125(f)

The information contained in the Operating Record will be made available upon request for inspection by the TCEQ.

#### 4.3.2 Manifest Retention 330.219(b)(8) and 312.145

Trip tickets and/or manifests will be retained on-site as required by 30 TAC §312.145 for sewage sludge, waste treatment sludge, domestic septage, chemical toilet waste, grit trap waste, or grease trap waste. Trip tickets are divided into five parts and records of trip tickets are maintained as follows: One part of the trip ticket will have the generator and transporter information completed and is given to the generator at the time of waste pickup. The remaining four parts of the trip ticket will have all required information completely filled out and signed by the appropriate party before distribution of the trip ticket. One part of the trip ticket will be kept by STD in its records; one part will be returned by the transporter to the person who generated the wastes within 15 days after the waste is received at the processing facility; one part will go to the transporter, who will retain a copy of all trip tickets showing the collection and disposition of waste; and finally, one part of the trip ticket must to go to the local authority, if needed. Paper or electronic copies of trip tickets will be retained for five years for §312.145 wastes and three years for other wastes. They will be readily available for review by commission's staff or be submitted to the executive director upon request.

The wastes received at the facility shall be manifested. The manifests must have information required by TCEQ. The following information is expected:

#### Generator Information:

- 1. Name of the waste generator;
- 2. Physical address of the waste generator;
- 3. Telephone number of responsible party; and
- 4. Signature (with date) of waste generator.

#### Waste Profile:

- 1. Type of waste generated and removed;
- 2. Size of waste vessel;
- 3. Volume of waste removed; and
- Hazardous Waste Disclaimer; requires the generator to certify that the waste does not meet the definition of a hazardous waste as outlined in 40 Code of Federal Regulation (CFR) Part 261 Subpart C and Part 261 Subpart D.

#### Transporter Information:

- 1. Name of the transporter;
- 2. Telephone number of the transporter;
- 3. TCEQ registration of the transporter;
- 4. Vehicle or disposal permit number of the transporter; and
- 5. Signature of the transporter (with date).

#### Processor Information:

- 1. Disposal or processing site;
- 2. Address of disposal or processing site;
- 3. Permit number of disposal or processing site; and
- 4. Signature (and date) of the site operator.

#### The material will be rejected if:

- Discrepancies on the manifest are found;
- Visual inspection, odor and if necessary, subsequent analysis of the sample indicates a prohibited waste; or
- The waste can't be identified.

The facility must note any significant discrepancies on each copy of the trip ticket. Trip ticket discrepancies are differences between the type of waste designated on the trip ticket and the quantity or type of waste a facility actually received. Significant discrepancies in type are obvious differences that can be discovered by routine inspection. Upon discovering a significant discrepancy, the transporter must attempt to reconcile the discrepancy with the waste generator or STD (e.g., with telephone conversations). If the discrepancy is not resolved within 15 days after delivering the waste, the transporter must immediately submit to the executive director a letter describing the discrepancy and attempts to reconcile it, and a copy of the trip ticket.

The facility will not accept waste from a transporter that is not registered.

#### 4.3.3 Report Signatures 330.219(c)

The owner/operator or duly authorized representative as defined in 305.44(a) or 330.219(c) will sign all reports and other information requested by the Executive Director and the person signing a report will make the following certification, as required by 305.44(b):

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

If an authorization is no longer accurate because of a change in individual or position, a new authorization satisfying the requirements of 330.219(c) must be submitted to the executive director prior to, or together with, any reports, information, or applications to be signed by an authorized representative.

#### 4.4 FIRE PROTECTION PLAN, 330.221

The local fire department will be informed of the location and processes used at the facility. Staff will be available to guide emergency personnel through the facility to help familiarize them with the process and system. The facility and its fire protection plan will comply with local fire codes. An adequate supply of water under pressure for firefighting is available on site and from a city fire hydrant. In an emergency, the City of Alice Fire Department can be reached by dialing 911. Neighboring business phones and mobile phones can be used in the event of phone system failure. Type ABC hand-held fire extinguishers will be located at the office and near the truck unloading area and will be readily available for use on trash, flammable liquid or electrical fires.

All facility personnel will be trained in the contents of the fire protection plan, fire extinguisher use, and in communications and response in the event of a grease, grass, structural or equipment fire.

The liquid waste has sufficient water content to prevent an ignition hazard. During waste processing, generation of heat or flammable vapors is not significant. Never use water on a grease fire; use a Type ABC fire extinguisher.

Other measures and precautions to be followed at the facility to minimize the occurrence of fires include:

- Clean up any grease, oil and chemical spills immediately, and keep work areas free of any extra paper, boxes or rags.
- Don't string electrical cords across floors or walkways where they can be stepped on and frayed, exposing the facility up to the possibility of an electrical fire.
- De-energize machinery before any maintenance work is started and thoroughly inspect that equipment before the power is turned back on.
- Use caution when using tools that cause friction or sparks near flammable materials.

#### Procedures in the Event of a Fire

Staff will take the following steps if a fire is discovered:

- Contact the Local Fire Department by calling 911.
- Alert other facility personnel.
- Assess extent of fire, possibilities for the fire to spread, and alternatives for extinguishing the fire. If it appears that the fire can be safely fought with available fire fighting devices until arrival of the Local Fire Department, attempt to contain or extinguish the fire.
- It is not advisable to attempt to fight the fire alone. Personal protective equipment could be needed. Be familiar with the use and limitations of firefighting equipment available onsite.
- Upon arrival of Local Fire Department personnel, direct them to the fire and provide assistance as appropriate.

#### 4.5 SITE ACCESS AND CONTROL 330.223 and 330.237

Public access will be controlled to minimize unauthorized vehicular traffic, unauthorized and illegal dumping, and public exposure to hazards associated with waste management. Access to the site is controlled by a minimum four foot barbed wire or six foot high chain link fence around the entire

facility and vehicular gates at locations shown on Figure 9. The vehicular gates will be locked at all times when the site is closed and not attended.

Safe on-site access for commercial vehicles will be provided with a two-way driveway approximately 24 ft wide and adequate turning radii off Commerce Road. The facility provides vehicle parking for equipment, employees and visitors. Driveways and all areas used by vehicles will have an all-weather pavement or aggregate surface. Driveways will accommodate 2-way commercial vehicle operation.

Facility traffic will travel on the all-weather access surfaces and should not track mud onto area roadways. If mud accumulates on the road from the site, it will be removed by the end of the day. Driveways will be maintained as necessary by grading or adding all-weather material to minimize depressions, ruts and potholes.

Dust generation is not anticipated due to extensive parking lot pavement and slow truck speeds. However, in the event that dust control is needed, the driveway can be periodically sprayed with water.

#### 4.6 UNLOADING OF WASTES AND INSPECTION OF INCOMING LOADS 330.225

The facility is not required to accept any waste that may cause problems in maintaining continuous compliance with TCEQ rules. To help ensure that only authorized liquid waste is received, the facility has adopted the following procedures for receiving and unloading wastes:

 All customers using the facility will be informed that this facility municipal or Class 2 or Class 3 nonhazardous industrial wastes comprised of grease trap, grit trap, lint trap and septage waste; raw sewage, lift station and chemical toilet waste; drinking water treatment and wastewater treatment sludge; food waste; stormwater and groundwater collection/drainage system cleanout wastes, landfill and compost leachate and gas collection condensate, and other municipal and Class 2 or Class 3 nonhazardous industrial waste liquids and sludges. Receipt of any other waste could contaminate the end product and cannot be unloaded. Drivers will affirm that the incoming material is only a waste authorized to be received, and they will also be informed that laboratory tests may be conducted on the waste and their customers could be interviewed to confirm information contained on the manifest.

- A trained facility employee will be responsible for accepting and directing the transport of all wastes and being at the unloading area each time that waste is unloaded. The employee will observe all loads of material coming into the facility and inspect it for odor and appearance. If the load is characteristic of an authorized waste and appears to conform to the waste designated on the manifest, the vehicle will be directed to the appropriate area for unloading. Drivers may unload waste without a facility employee present if that driver has been properly trained by the facility operator regarding acceptable wastes, recordkeeping, waste storage operation and the Site Operating Plan.
- If the waste appears to be unrepresentative of the source designated on the manifest, or if the contents are determined to be incompatible with plant operations, the load will be refused and directed to an alternate site for disposal. The observation and analysis results will be documented and kept in the site records.
- Appropriate signs and all-weather access routes to the unloading area will be used to indicate where trucks can unload.
- The unloading or processing of any hazardous waste or prohibited material at this facility shall not be allowed. Any hazardous waste or prohibited material shall be returned promptly to the transporter or generator of the material.
- The unloading of liquid waste in unauthorized areas is prohibited. Any wastes deposited in unauthorized areas will be removed immediately and disposed of properly. The unloading of the waste will be confined to as small an area as practical. Liquid waste may only be unloaded at the truck unloading and processing slabs which contain spill containment.
- If facility solids will go to a compost facility, grit trap waste will either be handled separately from other wastes, or it will be tracked through the process so that recovered grit trap solids or liquids will not be transported to a compost facility.

#### 4.7 SPILL PREVENTION AND CONTROL 330.227

If a spill occurs in areas other than the unloading areas, the necessary steps that will be taken by facility personnel to control and contain the spill may include:

- Begin cleanup immediately. Confine it to a small area by using industrial absorbents or temporary containment devices;
- Recover the spill by a vacuum truck or pump it into an available facility tank as soon as possible;
- Contact a cleanup contractor if the spill is unmanageable;
- Never wash leaks, spills or used cleanup materials onto nearby ditches and water courses; and
- Dispose of all used cleanup materials in a garbage can or the municipal landfill.

Processing of material will be conducted only by trained facility personnel. Personnel will periodically inspect all connections and piping during facility operations. If leakage is detected, processing of waste material will be stopped and the leak will be repaired. Spilled material will be collected or stabilized with absorbent material. A supply of industrial absorbent and deodorant or bleach will be maintained on site.

#### 4.8 OPERATING HOURS 330.229

Waste acceptance and processing operations, including transporting materials and heavy equipment operation, may occur 24-hours a day, 7-days a week. These waste acceptance and processing hours are needed because this facility serves food service businesses and restaurants, which are typically open seven days a week and late into the evenings. Grease trap pumping must occur at some facilities over the weekend or after normal operating hours, and this facility will provide a location for receipt of that waste. Acceptance of waste at theses expanded hours may require handling, processing, and transport of materials using heavy equipment at all hours. This allows the facility to operate effectively without upset and interruption of waste management services.

#### 4.9 SITE SIGN 330.231

The facility sign will be conspicuously displayed at all entrances to the facility through which wastes are received. It will measure at least four feet by four feet with letters at least three inches in height stating;

- (a) site name and type;
- (b) the actual waste acceptance hours and days;
- (c) the permit number; and

A 24-hour emergency contact number and 911 emergency response numbers are also recommended for the sign. The facility sign will be readable from the facility entrance and will contain up-to-date information.

#### 4.10 CONTROL OF WINDBLOWN MATERIAL AND LITTER 330.233

Liquid waste unloading and processing do not involve materials that are susceptible to becoming windblown litter, so special litter control practices would not be suitable or effective at the site. All driveways and other areas within the facility boundary, however, will be inspected daily for litter and other debris and if present, will be collected to minimize unhealthy, unsafe or unsightly conditions.

## 4.11 MATERIALS ALONG THE ROUTE TO THE SITE AND CONTROL OF ACCIDENTAL SPILLAGE 330.235

Since the facility receives liquid wastes in enclosed tanker trucks, spills of waste material along access routes aren't expected to occur. Facility personnel will inspect all incoming loads to assure that transport trucks bringing sludge material to the site are properly sealed and not leaking material. Inspection may include the tank(s), valve(s), and hoses. If leaks are observed, the driver will be informed of possible leaks. If the vehicle is found to have leaked prior to entrance into the facility, the transport company will be responsible for roadside inspections and cleanup of spilled liquids. Roadside inspection for spilled liquids manifested to the site and cleanup of spilled wastes are typically not desired by TxDOT or the City because potential traffic disturbance by such actions outweigh the potential benefits. Roadside cleanup, however, will be conducted if requested by TxDOT or the City.

#### 4.12 EQUIPMENT INSPECTION AND CONTINGENCY PLANS FOR OVERLOADING AND BREAKDOWN 330.241

Facility equipment, containment structures, and access control fencing will be inspected at least monthly for damage and improper operation. Maintenance and repairs will be performed when needed.

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 time for unprocessed waste is 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 Section 3.1.2 of this report. 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 72 hours, all the incoming material will be diverted to another approved facility.

In the event that a processing unit is inoperable and a replacement or duplicate unit is not available, material in excess of the amount capable of being processed by equipment on hand will not be accepted. Incoming loads which cannot be processed will be routed to another facility authorized by TCEQ.

If the units are operable but the transfer pump, processing 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. For breakdowns interrupting processing for longer than 72 hours, unprocessed waste can be processed by a mobile processor or transported to other liquid processing or solidification facilities.

#### 4.13 SANITATION AND PERIODIC CLEANING 330.243

All working surfaces that come into contact with wastes shall be washed down on a weekly basis, generally at the completion of processing. If continual operations are conducted, exposed working surfaces that come in contact with waste material will be washed down at least two times

per week. Wash waters used to clean tanks and tankers will be processed with waste materials or pumped to the sewer. 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.

#### 4.14 VENTILATION AND AIR POLLUTION CONTROL 330.245

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 compacted, watered and cleaned as necessary to obtain maximum control of dust emissions. Vehicular speeds on non-paved areas will not be allowed to exceed 10 miles per hour.

All liquid and solid waste will be stored in odor retaining containers and vessels. Liquids will be pumped from the unloading pits into the storage tanks without exposure to the air. The storage tanks are enclosed tanks. Other odor controls are described in Section 3.1.2.2.

A deodorant such as a biological deodorant or bleach will be at the site at all times to treat accidental spills of waste.

The facility will control any ponded water onsite so that objectionable odors can be dealt with if they occur. Any ponded water 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.

All of the operations at the facility are covered by one of the following permits by rule:

- 30 TAC §106.472 (organic and inorganic liquid loading and unloading for tank trucks, drums; storage containers, reservoirs, tanks); and
- 30 TAC §106.532 (water and wastewater treatment units).

No further air quality registration with TCEQ is required.

As required under 30 TAC §101.201 - Emissions Event Reporting and Recordkeeping Requirements, the facility will promptly notify the TCEQ and local air pollution control programs

of any 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 event). For emissions events that are not reportable, records will be maintained as required under 30 TAC §201(b)(2).

30 TAC 101.1(28) defines an emissions event as "Any upset event or unscheduled maintenance, startup, or shutdown activity, from a common cause that results in unauthorized emissions of air contaminants from one or more emissions points at a regulated entity". Emissions of air contaminants from the facility during normal operations are negligible and are permitted by rule via 30 TAC 106.532.

The facility does not anticipate any scheduled maintenance or startup and shutdown activity that will cause emissions in excess of the reportable quantity of an individual air contaminant. All equipment will be maintained in good operating condition and if any planned maintenance, startup, or shutdown are foreseen that may cause excessive emissions, the TCEQ will be notified at least 10 days in advance (or soon as practical) per the requirements of 30 TAC 101.211 - Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping requirements. Records will be maintained of the type and quantity of emissions during these periods as well as actions taken to minimize these emissions.

#### 4.15 HEALTH AND SAFETY PLAN 330.247

Prior to initiating operations, safety procedures will be developed and adapted for the facility, and training will be provided for all employees. All the activities will be supervised by the facility supervisor to ensure the safety of all persons on the site. At least one of the supervisors or managers of operations for the facility will have a solid waste facility supervisor license, as defined in 30 TAC 30.

Facility personnel must successfully complete a program of on-the-job training that teaches them to perform their duties in a way that promotes safety and ensures the facility's regulatory compliance. This training can be provided by supervisors or knowledgeable staff. This training will be performed before an individual is qualified to inspect incoming loads.

At minimum, the training program must be designed to ensure that personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including and as applicable:

- (A) procedures for using, inspecting, repairing, and replacing facility emergency equipment;
- (B) response to fires or explosions; and
- (C) shutdown of operations.

Topics for training will include:

- All aspects of the operation of the facility, including the Site Operating Plan, material acceptance procedures and recordkeeping,
- Fire protection, prevention, and evacuation,
- Fire extinguisher use,
- Emergency response,
- Litter control and windblown waste pick-up,
- Hazardous waste and PCB waste detection and control, and
- Characteristic odors and appearance of accepted wastes and unauthorized wastes.

#### 4.16 EMPLOYEE SANITATION FACILITIES, 330.249

A rest room with a sink, toilet and potable water is provided for the use of all employees and visitors in the office area of the facility.

#### 4.17 NON APPLICABLE REGULATORY SECTIONS

- §330.207 (c) is not applicable since there will be no use of leachate and gas condensate use in any mining process;
- §330.207(h), applicable only for liquid waste transfer facilities;

- §330.209(c), applicable only for transfer stations;
- §330.213, applicable only for citizen's collection stations. There will not be any citizen's collection station at this site;
- §330.215, applicable only for stationary compactors;
- §330.217, applicable only for Type V mobile liquid waste processing and Type VI demonstration projects;
- §330.219(b)(6), (d), and (h); applicable only for special waste or medical wastes, which are not accepted at this facility, or applicable only for composting and landfill mining facilities;
- §330.219(b)(9) applicable only for registered facilities and not for permitted facilities;
- §330.239, applicable only for transfer stations and not applicable for this processing facility; and
- §330.245(i), is not applicable since there are no mobile liquid waste processing units.





S:\AUS\STXWW.M001.MSW\CAD\STXWW.M001.MSW002 Site Location Fig 2R1.dwg



#### CLOSURE COST ESTIMATE SOUTH TEXAS DEWATERING FACILITY PHASE 1

CLOSURE ELEMENT DESCRIPTION - PHASE I	Unit Measure	Unit Cost	Number of Units	Tota	al Cost	<i>i</i> * **
A. State administration of site closure						J. JEFFREY GLASER
1. Observe site and review file to determine closure activities	Hour	\$150.00	16	\$	2,400	v: 79731 .€
2. Prepare bid documents and procure bids	Hour	\$150.00	20		3,000	On KIODISED
3. Contract award and administration of contract	Hour	\$150.00	16		2,400	IS CEINSE NG
				_		STONAL
			Subtotal Part A.	\$	7,800	
B. General cleanup of the site and process unit(s)					-	For permitting only 5/26/2023
1. Waste Sampling / testing / classification						hold Deman
a. Classification Sampling (3 samples)						They sand
- Liquids (1 Composite Sample)	Sample	\$800.00	1	\$	800	
- Solids (1 Composite Sample)	Sample	\$590.00	1		590	
b. Sampler Costs	Hour	\$130.00	3		390	
c. Sampling supplies /travel / per diem	Lump Sum	\$250.00	1		250	
2. Transport and/or disposal of waste at a properly authorized facility						
a. Unprocessed waste disposed - 2 receiving tanks	gallon	\$0.15	42,000		6,300	
<li>b. Processed solids (transport and disposal at a landfill)</li>	Rolloff unit (each)	\$1,032.00	2		2,064	
c. Processed sludge tank	gallon	\$0.15	0		0	
d. Washdown water	gallon	\$0.15	4,000		600	
e. Preparation of disposal paperwork	Hour	\$130.00	2		260	
f. Lime and polymer tanks	gallon	\$0.15	4,000		600	
3. General cleanup	0					
(labor and supplies for washdown, disinfection, decontamination of concrete and						
units, disconnecting and storage of equipment)	Hour	\$100.00	16		1,600	
4. Vector control procedures	Lump sum/month	\$300.00	1		300	
				_		
			Subtotal Part B.	\$	13,754	
C. Completion of cleanup						
1. Sign installation, securing buildings and access	Lump Sum	\$1,000.00	1		1,000	
2. Perform site inspection and prepare certification of work completion	Hour	\$150.00	16		2,400	
				_		
			Subtotal Part C.	\$	3,400	
D. Contingency cost	1	15% of AC. To	tal	\$	3,743	
			2022 dollars)		28 607	
				Ψ	20,037	

#### ASSUMPTIONS:

- 1. All costs reflect the work being performed by an independent third party contractor, administered by TCEQ.
- 2. No waste material will be accepted after the closure filing date.
- 3. Assume two waste receiving tanks are full with unprocessed waste (2 x 21,000 gallons = 42,000 gallons).
- Liquid will be hauled to a liquid processing or compost facility or landfill for disposal at \$0.15/gal based on processor quote.
- 4. Assume dewatering processing units are 80% full with processed waste (fill ports prevent further filling). Disposal cost is \$732 at Corpus Christi landfill and haul is \$300/rolloff container = \$1032
- 5. Assume the polymer and lime tanks are full (1000 + 3000 gallons = 4,000 gallons) and hauled to a processing facility for use or disposal at \$0.15/gal per processor quote.
- 6. Concrete & other built structures, after decon, will be abandoned in place.

7. Classification Sampling includes: (solids) SVOC's, VOC's, FOG, RCRA8 metals and TPH Tests; Same for Liquids plus FOG, BOD, and TSS. Unit costs are from a commercial lab rate sheet.

 The unit transportation and disposal costs are representative of the cost to contract an outside disposal company to remove the tank contents and transport them for disposal/recycling to at facility licensed for disposal of this kind of waste.

#### CLOSURE COST ESTIMATE SOUTH TEXAS DEWATERING FACILITY PHASE 2

CLOSURE ELEMENT DESCRIPTION - PHASE 2	Unit Measure	Unit Cost	Number of Units	Total Cost		
A. State administration of site closure						
1. Observe site and review file to determine closure activities	Hour	\$150.00	16	\$	2,400	
2. Prepare bid documents and procure bids	Hour	\$150.00	20		3,000	
3. Contract award and administration of contract	Hour	\$150.00	16	_	2,400	
			Subtotal Part A.	\$	7,800	
B. General cleanup of the site and process unit(s)						
1. Waste Sampling / testing / classification						
a. Classification Sampling (3 samples)						
- Liquids (1 Composite Sample)	Sample	\$800.00	2	\$	1,600	
- Solids (1 Composite Sample)	Sample	\$590.00	2		1,180	
b. Sampler Costs	Hour	\$130.00	4		520	
c. Sampling supplies /travel / per diem	Lump Sum	\$250.00	1		250	
<ol><li>Transport and/or disposal of waste at a properly authorized facility</li></ol>						
a. Unprocessed waste and process tank - 2 @21 Kgal + 3 @20 Kgal	gallon	\$0.15	102,000		15,300	
<li>b. Grit and Processed solids (transport and disposal at a landfill)</li>	Rolloff or Process Unit (each)	\$1,032.00	4		4,128	
c. Processed Sludge tank	gallon	\$0.15	20,000		3,000	
d. Washdown water and DAF effluent	gallon	\$0.15	10,000		1,500	
e. Preparation of disposal paperwork	Hour	\$130.00	3		390	
f. Lime and polymer tanks	gallon	\$0.15	4,000		600	
3. General cleanup						
(labor and supplies for washdown, disinfection, decontamination of concrete and						
units, disconnecting and storage of equipment)	Hour	\$100.00	24		2,400	
4. Vector control procedures	Lump sum	\$300.00	1	_	300	
			Subtotal Part B.	\$	31,168	
C. Completion of cleanup	Luman Cum	¢4 000 00	4		4 000	
Sign installation, securing buildings and access		\$1,000.00	1		1,000	
2. Perform site inspection and prepare certification of work completion	Hour	\$150.00	10		2,400	
			Subtotal Part C.	\$	3,400	
D. Contingency cost	15	% of AC. To	otal	\$	6,355	
	CLOSURE CO	OST TOTAL	(2022 dollars)	\$	48,723	

#### ASSUMPTIONS:

1. All costs reflect the work being performed by an independent third party contractor, administered by TCEQ.

2. No waste material will be accepted after the closure filing date.

 Assume three waste receiving tanks and two processing tanks are full with unprocessed waste (2 x 21,000 gallons +3 X 20,000 gallons = 102,000 gallons). Liquid will be hauled to a liquid processing or compost facility or landfill for disposal at \$0.15/gal based on processor quote.

- 4. Assume one processed sludge tank is full (1 x 20,000 gal=20,000 gallons) .
- Liquid will be hauled to a nearby liquid processing facility or landfill for disposal at \$0.15/gal based on processor quote.

5. Assume 3 dewatering processing units are 80% full with processed waste (fill ports prevent further filling). Assume grit area is full with 1 ft depth of grit. 27.8 cy of grit is placed in one processing unit for transport and is of similar weight as a full processing unit. Disposal cost is \$732 at Corpus Christi landfill and haul is \$300/rolloff container = \$1032.

6. Assume the polymer and lime tanks are full (1000 + 3000 gallons = 4,000 gallons) and hauled to a processing facility for use or disposal at \$0.15/gal per processor quote.

7. Concrete & other built structures, after decon, will be abandoned in place.

8. Classification Sampling includes: (solids) SVOC's, VOC's, FOG, RCRA8 metals and TPH Tests; Same for Liquids plus FOG, BOD, and TSS. Unit costs are from a commercial lab rate sheet.

9. The unit transportation and disposal costs are representative of the cost to contract an outside disposal company to remove the tank contents and transport them for disposal/recycling to at facility licensed for disposal of this kind of waste.

JEFFREY GLAS

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J. Jeffrey Dlaser

For permitting only

5/26/2023



1375 Creekview Drive San Antonio, Texas

May 9, 2023

South Texas DeWatering 502 Commerce Rd Alice, Texas

#### Re: South Texas DeWatering Transport & Disposal Proposal 5-9-23

Please see the rate sheet below. This estimate has been prepared for future closure activities for transport and disposal of liquid waste to one of SouthWaste's disposal facilities. No dump fees to a third party are calculated into this rate. If that changes, we will have to reevaluate the proposal.

#### Waste transport and disposal will be charged at a rate of:

\$.15 per gallon

Sincerely,

Ben Camacho, Director of Compliance, South Disposal, LLC.

#### Jeff Glaser

Subject:

South Texas DeWatering, INTERA

#### This Correspondence sent to jglaser@intera.com on 01-04-2023



Re: Project Review under the Antiquities Code of Texas THC Tracking #202303330 Date: 01/04/2023 South Texas DeWatering, INTERA 502 Commerce Rd

Description: Type V municipal solid waste permit for the operation of a municipal liquid waste processing facility

Dear Client:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the Executive Director of the Texas Historical Commission (THC), pursuant to review under the Antiquities Code of Texas.

The review staff, led by Jeff Durst, has completed its review and has made the following determinations based on the information submitted for review:

#### **Archeology Comments**

• No effect on identified archeological sites or other cultural resources. However, if cultural materials are encountered during project activities, work should cease in the immediate area; work can continue where no cultural materials are present. Please contact the THC's Archeology Division at 512-463-6096 to consult on further actions that may be necessary to protect the cultural remains.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: <a href="mailto:leff.Durst@thc.texas.gov">leff.Durst@thc.texas.gov</a>.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <a href="http://thc.texas.gov/etrac-system">http://thc.texas.gov/etrac-system</a>.

Sincerely,

Willim J. Marth

for Mark Wolfe, State Historic Preservation Officer Executive Director, Texas Historical Commission

Please do not respond to this email.

cc: <u>matthew.udenenwu@tceq.texas.gov</u>



Donna McCarver Office Manager/Team Leader Archeology Division P.O. Box 12276, Austin, Texas 78711-2276 Phone: +1 512 463 6096 Fax: +1 512 463 8927

