SET ENVIRONMENTAL, INC.

HOUSTON FACILITY
SITE PROFILE

SET ENVIRONMENTAL, INC. SITE PROFILE

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Revised – July 2024

EXHIBITS

SET ENVIRONMENTAL, INC.

SITE PROFILE

I. GENERAL INFORMATION

NAME:	**SET Environmental, Inc.**
MAILING ADDRESS:	5738 Cheswood Houston, Texas 77087
FACILITY ADDRESS:	5743 Cheswood Houston, Texas 77087
TELEPHONE:	(800) 598-7328 or (713) 645-8710
FAX:	(713) 649-1027
CONTACTS:	Dave DeVries CEO Joel Tameling President Walter C. Kilgus Facility General Manager Scott Skoog Facility Engineer Daniel A. Didier Compliance Director James Vasquez Safety Manager Pamela Page Nowlin General Manager-Houston Field Services/Sales Manager
OFFICE HOURS:	8:00 a.m. to 5:00 p.m. (Weekdays)
RECEIVING HOURS:	8:00 a.m. to 4:00 p.m. (Weekdays)

II. SITE DESCRIPTION

LAYOUT

The facility is situated on a one (1) acre site and has three (3) permitted storage buildings (a map of the facility is included as Exhibit A):

1. Warehouse - used for various types of hazardous waste storage, and metal drum compaction. This storage building has a concrete base that is coated with an epoxy sealant. To prevent run-on, run-off and accumulation of rainwater this building is roofed, has walls and is surrounded by a six-inch high concrete curb. Six-inch high concrete curbs within the containment area are used to separate incompatible material. Each separate storage area has the capacity to contain a minimum of 10% of the volume of waste stored in that area and 100% of the largest container in that area.

2. Process Building - used for chemical treatment, compressed gas and lab pack processing. This storage building also has a concrete base, is roofed and has walls. A six-inch high concrete secondary containment curb also surrounds this building. This building houses two permitted container storage units (CS-1 and CS-3) and three chemical treatment tanks (PT-2, PT-11, PT-12).

3. Ignitable Storage Building - used for the storage of flammable wastes in containers. This container storage area has a concrete base, is roofed and enclosed on three sides. The container storage area is sloped to a low point in the center of the building and has the capacity to contain a minimum of 10% of all waste and 100% of the largest container stored in this area. This building is divided into three separate permitted storage units (CS-4, CS-5 and CS-6). Prior to 2009 this building housed 4 fuel blending tanks that have been clean closed and removed. A permit modification authorized November 13, 2017 expanded CS-6 to include the old fuel blend tank farm.

LOCATION

The facility is located outside the 100-year flood plain and on top of a divide between two watersheds. This explains why, with all the flooding Houston has experienced, there has never been any flooding near the facility. The surrounding area within one mile of the facility is classified as mixed commercial, residential and industrial. The nearest home is 1,100 feet north, the nearest school is 3,500 feet southeast and the nearest surface water (Sims Bayou) is 7,250 feet southeast of the facility. There are no down gradient drinking water wells within one (1) mile. Storm water flows to Brays Bayou located 2 miles north of the facility.

SECURITY

A six (6) foot high chain link fence topped with three (3) strands of barbed wire encloses the entire facility. All gates are closed and locked using magnetic locks and/or case-hardened chains and pad locks. On-site security personnel patrol the facility during non-operational hours. The facility is equipped with an intrusion detection and CCTV System. As required by 40 CFR 264.24, signs that state “Danger - Authorized Personnel Only” are posted on the perimeter of the site. These signs are posted in English and are visible from at least 25 feet.

FACILITY HISTORY

SET Environmental, Inc. was incorporated in the State of Illinois on April 4, 1979 and purchased the facility from Nuclear Sources and Services Inc. (NSSI) on April 8, 1988. At the time of purchase, the facility was under interim status and had been operated by NSSI since 1985.

The site was used for agricultural purposes up to 1930. Between 1930 and 1981 the property was privately owned. During this time no entities were identified that would suggest any on site industrial or commercial activities. Aerial photographs taken in 1969 and 1975 show the property to be vacant. Nuclear Sources and Services, Inc. (NSSI) purchased the property in 1981. NSSI began construction of the existing facility in 1985 for the purpose of hazardous waste treatment and storage.

Prior to purchasing the facility, SET Environmental hired an independent engineering and consulting firm to conduct a pre-acquisition environmental risk assessment of the property. The assessment included sampling of soil and groundwater. There were no signs of contamination observed in the groundwater; however, low concentrations (highest level = 3.1 ppm) of PCBs were detected in the upper foot of soil at the southern most end of the facility. Soil core analysis at two- and three-foot depth did not show any contamination. The soil showing low concentrations of PCB's in the upper foot was excavated and disposed of in April of 1988.

SET Environmental, Inc. was issued a Part B Permit on October 4, 1990 from the Texas Natural Resource Conservation Commission and December 14, 1990 from the United States Environmental Protection Agency. SET Environmental's RCRA permit was renewed in 2002, 2013, June 6, 2024 and will expire on June 6, 2034. The facility name was changed from Treatment One, Division of SET Environmental to SET Environmental, Inc. in March of 2002 to better convey the comprehensive services offered by the company.

III. FINANCIAL INFORMATION

CORPORATE OFFICE:	SET Environmental, Inc. 450 Sumac Road Wheeling, Illinois 60090 (800) 634-6856 or (847) 537-9221
FORM OF OWNERSHIP:	Private Corporation
COMPANY OFFICERS:	Dave Devries, CEO Bernard Tameling, Secretary/Treasurer
DUN & BRADSTREET NO:	09-897-9297
CLOSURE PLAN MECHANISM:	Trust Fund (fully funded)
CLOSURE COST ESTIMATE:	$1,157,710 (Last Update: December 2023)
INSURANCE CERTIFICATE:	See Exhibit B
NUMBER OF EMPLOYEES:	Approximately 650 (Total), 40 (Houston Facility)

IV. REGULATORY INFORMATION

USEPA ID NO:	TXD055135388	
STATE REGISTRATION NO:	50267	
PART B PERMIT NO:	HW-50267-001 (See Exhibit C)	
SIC CODE:	4953	Refuse Systems
	4953-01	Hazardous Waste Collection and Distribution
NAICS CODE:	562211	Hazardous Waste Treatment and Disposal
REGULATORY STATUS:	SET - Houston is currently under no enforcement action by any regulatory body.	
PERMIT WRITER:	Texas Commission on Environmental Quality Fabienne Rambaud, P.E, MC130 Waste Permits Division Industrial and Hazardous Wastes Permits Section P.O. Box 13087 Austin, TX 78711-3087 fabienne.rambaud@tceq.texas.gov	
INSPECTION OFFICIAL:	Texas Commission on Environmental Quality, Region 12 5425 Polk Avenue, Suite H Houston, Texas 77023 Ms. Oindrila Das, (713) 767-3749	

V. ADMINISTRATIVE INFORMATION

BACKGROUND OF KEY PERSONNEL:

Dave DeVries, CEO, B.S. Business Administration
1997 - Present – SET Environmental, Inc.
1994 - 1997 - General Manager; Treatment One, Division of SET Environmental
1991 - 1994 - General Manager; SET Environmental, Inc.- Remediation Division
1986 - 1991 - Various Positions; SET Environmental, Inc.

Walter (Chuck) Kilgus, Facility General Manager, B.S. Biology, Minor Chemistry
1998 – Present – SET Environmental, Inc.
1995 - 1998 – Environmental Field Services Manager, SET Environmental
1991 - 1995 - Lab Pack Approvals Coordinator; SET Environmental

Bob Mann, Facility Chemist, M.S. Chemistry
1989 - Present – SET Environmental, Inc.
1987 - 1989 - ENSCO; Chief Chemist

Scott Skoog, Facility Engineer, B.S. Chemical Engineering, PE
1995 – Present – SET Environmental, Inc.
1993 - 1995 – Operations Manager, Treatment One, Division of SET Environmental
1985 - 1993 - SET Environmental, Inc; Permitting

Daniel A. Didier, Health Safety & Compliance Director, B.S. Forestry
Certified Hazardous Materials Manager, 1993
1988 - Present – SET Environmental, Inc.
1986 - 1988 - SET Environmental, Inc; Project Manager

James Vasquez, CSP, CSP, CSST/CSSS/ST/FS-NCCER, Safety Manager
2023 – Present SET Environmental, Inc.
2019 - 2022 Area Safety, Hi-Tech Industrial Services, LLC, Decatur, IL,
2015 - 2019 Safety, Stronghold Companies (Stronghold Inspection, EPC, ETS, Turnkey I&E, and Citadel), La Porte, TX
2014 - 2015 Laboratory, Inspectorate Bureau Veritas,
2005 - 2014 Chemical, Operations, and Laboratory, SGS North America Inc., Multiple Locations, TX

Pamela Page Nowlin, Sales Manager
1996 - Present – SET Environmental, Inc.
1992 - 1996 - Shipping, Receiving & Inventory/Administration Manager
1991 - 1992 - Canonie Environmental; Business Development Manager
1990 - 1991 - MSP Technical Service; District Account Manager
1986 - 1990 - Chemical Waste Management; Customer Service

BREAKDOWN OF EMPLOYEES BY DEPARTMENT:

Sales (off site) 4
Customer Service (off-site) 4
Waste Approvals 3
Finance & Billing (off-site) 2
Laboratory 2
Drum Processing 3
Lab Pack Processing 3
Shipping and Receiving 3
Cylinder Management 7
Maintenance 4
Compliance and Safety 2
Administration & Human Resources 5

VI. WASTE PROCESSING SYSTEMS

CHEMICAL TREATMENT: There are three tanks that make up the chemical treatment system. The tanks: identification numbers are PT-2, PT-11, and PT-12; permit numbers are 8, 9, and 16, and capacities are 1,870, 1,500, and 1,500 gallons, respectively.

All four tanks and associated ancillary equipment are:

(1) Above ground;
(2) Equipped with sealed secondary containment capable of containing the contents of the largest tank;
(3) Equipped with agitators except PT-12;
(4) Inspected every three (3) years for integrity by an independent registered professional engineer, and are;
(5) Inspected each workday by qualified facility personnel. The purpose of this inspection is to identify any leaks, corrosion or other system failure in the tanks, ancillary equipment and secondary containment.

PT-2, PT-11 ancillary equipment:

(1) Equipped with corrosion protection (Kynar liners PT-2 and PT-11 or electroless nickel plating PT-12);
(2) Connected to an air emissions control system that is composed of a recirculating caustic counter current packed scrubber in line with an 8000-pound activated carbon bed PT-2 and PT-11.

PT-12 ancillary equipment:

(1) Equipped with corrosion protection (electroless Nickel clad carbon steel tank);
(2) Connected to an air emissions control system that is composed of a recirculating counter current packed scrubber in line with a cyclonic separator and venturi for particulate removal. The scrubber medium will either be caustic for acid gas treatment or potassium permanganate for treatment of reducing compounds.

The treatment processes designated for each tank are as follows: PT-2 and PT-12 are used for neutralization, chemical oxidation, chemical reduction and hydrolysis of compressed or liquified gases, and PT-11 is used primarily for hydrolysis of water reactive acids, oxidation/reduction and neutralization of liquids, solids.

GAS CYLINDER PROCESSING: SET Environmental, Inc. has a variety of scrubbing techniques used for the treatment and disposal and recycling of compressed gases. All processing activities take place under emission-controlled atmosphere. All tanks are equipped with an vented enclosure the allows for remote handling of gas cylinders. The flow of gases through the scrubbing systems is controlled from outside the treatment building, thereby eliminating potential exposure to the gases.

Several portable processing units are used for the treatment of compressed gases. Each primary treatment unit is equipped with a back-up unit of equal capacity. These portable processing units are connected to an air emissions control system

consisting of a caustic scrubber to remove acidic fugitive emissions and venturi scrubber to remove particulates.

Four large enclosures, maintained under negative pressure are utilized while connecting compressed gas cylinders to manifold systems. Air exhaust from each hood is controlled by an air emission control system (i.e., carbon beds, caustic scrubber, or hydride scrubber). Each system is designed to prevent employee exposure and capture any potential fugitive emissions.

In addition to processing compressed gases, SET Environmental, Inc. has the capability to overpack or repack cylinders in poor condition and to process cylinders with inoperable valves.

VII. EMISSIONS CONTROL SYSTEMS

ACTIVATED CARBON BEDS: Two separate activated carbon beds are utilized throughout the facility. The following chemical processing areas have emissions controlled with activated carbon.

1. Lab Pack Processing Unit
2. Two chemical treatment tanks (PT2 and PT11)
3. Portable Gas Cylinder Processing Units
4. Enclosure at PT-2

CAUSTIC SCRUBBERS: The facility has four caustic scrubbing units. Three are vertical, counter current, recirculating, packed towers. The fourth unit is a horizontal, caustic bath scrubber.

The following areas have emissions controlled with caustic scrubbers.

1. Chemical Treatment Tanks (PT2, PT11 and PT-12)
2. Gas Cylinder Processing Units and Enclosures
3. Lab Pack Consolidation Enclosure

PARTICULATE SCRUBBERS: The facility utilizes a reverse pulse, high efficiency particulate filtration system (HEPA) to collect silica generated during the treatment of hydride gases. Connected to one of the caustic scrubbers is a venturi particulate scrubber to capture fine particulates generated from the treatment of acidic gases. The air emissions system for PT-12 is equipped with a cyclonic separator and venturi.

VIII. WASTE TREATMENT INFORMATION

WASTE MANAGEMENT METHODS: Neutralization, Oxidation/Reduction, Hydrolysis, Repackaging, and Storage.

PACKAGING REQUIREMENTS: SET Environmental, Inc. will only accept DOT authorized packagings for shipments of hazardous materials; non-hazardous materials may be shipped in non-DOT specification packagings. Lab Pack and Gas Cylinder Protocols are available upon request.

UNACCEPTABLE MATERIAL: TSCA regulated PCBs, Radioactive Material, Explosives, Infectious Wastes and Dioxins.

EMPTY DRUM HANDLING: All drums are power washed and are either reused by SET Environmental, Inc. or are rendered unusable. Metal drums are crushed and cylinders are cut in half and sent off-site for scrap metal recycling. Poly drums are cut up and shipped off-site for land disposal.

IX. SAFETY AND TRAINING

TRAINING: SET Environmental, Inc. has developed a comprehensive training program structured into five areas: Administrative, Safety, Regulatory, Technical and Operational. Initial training includes 40 hours of classroom instruction. Each facility employee is certified in CPR/Standard First Aid. Continuing education includes a minimum of eight hours annual review complimented with monthly safety meetings.

MEDICAL MONITORING: SET Environmental, Inc.'s medical surveillance program includes a pre-employment and an annual physical examination as well as an examination upon any suspected exposure and upon termination of employment. A physician experienced in industrial medicine monitors medical surveillance results.

SAFETY EQUIPMENT: Phones readily accessible near the point of operations that can be used to summon emergency assistance. Emergency response and first aid stations are located near each processing area. See Exhibit D for description emergency response equipment. Each building is equipped with an automatic fire suppression system. The system activates when thermal detectors are exposed to a temperature of 190ºF or a temperature rise of 15º F in one minute or less. Each hood enclosure is also equipped with a separate automatic dry chemical fire extinguishing system. Once automatic systems are activated, an alarm sounds to evacuate employees and a monitoring service contacts the Fire Department. The facility is also equipped with a general alarm to aid in evacuation of the facility personnel for other emergencies. Activators are located in all facility exit routes.

X. LABORATORY INFORMATION

PERSONNEL: Experienced, degreed chemists staff SET ENVIRONMENTAL, INC.'s laboratory.

EQUIPMENT: The Houston lab is equipped with a flashpoint tester, a bomb calorimeter, halogen analyzers, pH meter, Karl Fischer titration unit, hydrometer, fourier-transform infrared spectrometer (FT-IR), and mass spectrometer.

WASTE ANALYSIS: A minimum of ten percent of the containers are sampled for each wastestream in each shipment, although SET Environmental, Inc. typically takes a composite sample of 100 percent of the containers. The sample is then analyzed to verify that wastes received are those described on the wastestream profile. Depending on the type of waste, analysis may include: % water, flashpoint, pH, BTU, %halides, specific gravity, reactive sulfide, reactive cyanide, qualitative tests for peroxides and oxidizing potential. Lab packs are unpacked and checked for conformance with

approved lab pack inventories. If the waste stream or lab pack does not conform to previously approved paperwork, SET Environmental, Inc. will contact the generator or the generator's agent in an effort to resolve the discrepancy. If the discrepancy requires further investigation, SET Environmental, Inc. will conditionally accept the waste if authorized by the generator until further analysis can be conducted. If the discrepancy cannot be resolved (this rarely occurs) the waste will be returned to the generator or an alternate facility.

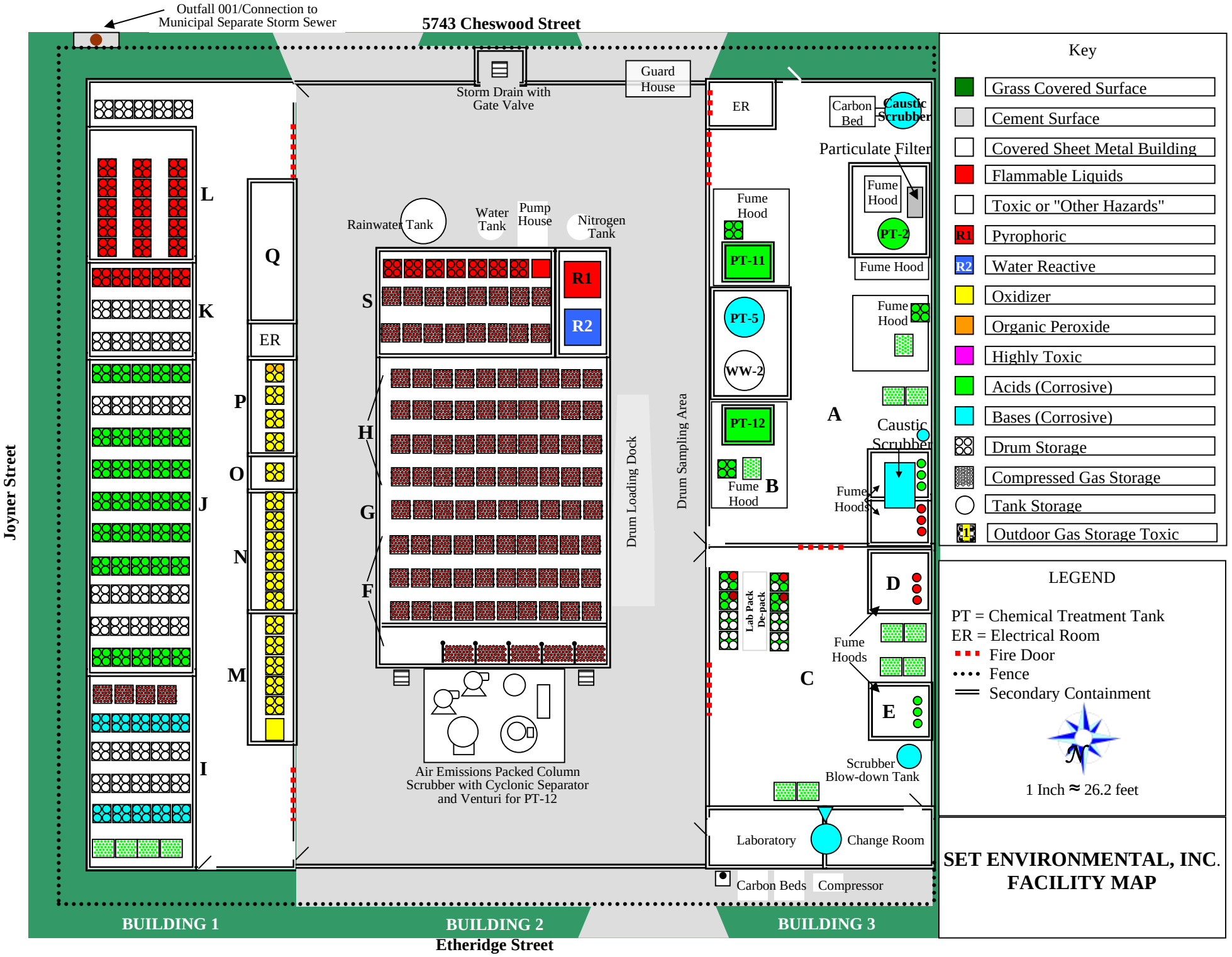
XI. RECORD KEEPING AND REQUIRED FORMS

INTERNAL RECORDS: The following records and documents are maintained by SET Environmental, Inc.: Container Inventory and Tracking System, Contingency Plan, Spill Prevention Control and Counter Measure Plan, Waste Minimization Program, Waste Analysis Plan, Inspection Schedule, Training Documentation.

WASTE PROFILE: Waste Profile sheets are required for each individual wastestream.

LAB PACK INVENTORIES Lab Pack inventories must be submitted with a Lab Pack summary form signed by the packaging agent and generator for each Lab Pack project.

CYLINDER PROFILE: Cylinder Profiles must be submitted with each batch of cylinders for approval. In addition to the completed Gas Cylinder Profile, a Gas Cylinder Inspection and Evaluation Report must be completed and attached to the Profile. The Gas Cylinder Profile must be signed by the packaging agent and generator. If at all possible, include pictures of each cylinder.


Outfall 001/Connection to Municipal Separate Storm Sewer
5743 Cheswood Street
Storm Drain with Gate Valve
Guard House
Joyner Street
Rainwater Tank
Water Tank
Pump House
Nitrogen Tank
ER
Carbon Bed
Caustic Scrubber
Particulate Filter
Fume Hood
PT-2
PT-11
PT-5
WW-2
PT-12
R1
R2
L
K
J
I
Q
P
O
N
M
S
H
G
F
A
B
C
D
E
Drum Loading Dock
Drum Sampling Area
Lab Pack De-pack
Fume Hoods
Caustic Scrubber
Scrubber Blow-down Tank
Air Emissions Packed Column Scrubber with Cyclonic Separator and Venturi for PT-12
Laboratory
Change Room
Carbon Beds
Compressor
BUILDING 1
BUILDING 2
BUILDING 3
Etheridge Street
Key
Grass Covered Surface
Cement Surface
Covered Sheet Metal Building
Flammable Liquids
Toxic or "Other Hazards"
Pyrophoric
Water Reactive
Oxidizer
Organic Peroxide
Highly Toxic
Acids (Corrosive)
Bases (Corrosive)
Drum Storage
Compressed Gas Storage
Tank Storage
Outdoor Gas Storage Toxic
LEGEND
PT = Chemical Treatment Tank
ER = Electrical Room
Fire Door
Fence
Secondary Containment
N
1 Inch ≈ 26.2 feet
SET ENVIRONMENTAL, INC.
FACILITY MAP

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 05/22/2024

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Acrisure LLC 1621 Colonial Parkway Inverness IL 60067	**CONTACT NAME:** **PHONE (A/C, No, Ext):** (847)330-5000 **FAX (A/C, No):** (847) 705-1075 **E-MAIL ADDRESS:** tgcerts@hni.com
INSURED SET Environmental, Inc. 450 Sumac Road Wheeling IL 60090-6350	**INSURER(S) AFFORDING COVERAGE** / **NAIC #** **INSURER A :** Indian Harbor Insurance Company 36940 **INSURER B :** XL Insurance America, Inc 24554 **INSURER C :** **INSURER D :** **INSURER E :** **INSURER F :**

COVERAGES **CERTIFICATE NUMBER:** 01) 24-25 CERT (MAIN) **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	☒ COMMERCIAL GENERAL LIABILITY ☐ CLAIMS-MADE ☒ OCCUR ☒ X,C,U Included ☐ GEN'L AGGREGATE LIMIT APPLIES PER: ☒ POLICY ☐ PRO-JECT ☐ LOC ☐ OTHER:			GEC0031513-14	05/07/2024	05/07/2025	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG |	$ 1,000,000 $ 100,000 $ 10,000 $ 1,000,000 $ 2,000,000 $ 2,000,000 $
B	AUTOMOBILE LIABILITY ☒ ANY AUTO ☐ OWNED AUTOS ONLY ☐ SCHEDULED AUTOS ☒ HIRED AUTOS ONLY ☒ NON-OWNED AUTOS ONLY ☒ MCS-90 ☒ CA9948			AEC0031511-14	05/07/2024	05/07/2025	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident) |	$ 1,000,000 $ $ $ $
A	☐ UMBRELLA LIAB ☒ OCCUR ☒ EXCESS LIAB ☐ CLAIMS-MADE ☐ DED ☐ RETENTION $			UEC0031512-14	05/07/2024	05/07/2025	EACH OCCURRENCE AGGREGATE |	$ 11,000,000 $ 11,000,000 $
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) ☐ Y / N If yes, describe under DESCRIPTION OF OPERATIONS below	N / A					☐ PER STATUTE ☐ OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $ $ $
A	PROFESSIONAL & POLLUTION LEGAL LIABILITY			PEC0031514-14	05/07/2024	05/07/2025	EACH OCCURRENCE AGGREGATE	$10,000,000 $10,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

This certificate supercedes any previously issued certificates.

CERTIFICATE HOLDER

**********Proof of Coverage**********

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 3/12/2024

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Cottingham & Butler 800 Main St. Dubuque IA 52001	**CONTACT NAME:** To Request a Certificate **PHONE (A/C, No, Ext):** 888-785-4677 **FAX (A/C, No):** 563-587-5990 **E-MAIL ADDRESS:** certificates@cottinghambutler.com
INSURED SETENV1 SET Environmental, Inc. 450 Sumac Road Wheeling IL 60090	**INSURER(S) AFFORDING COVERAGE** / **NAIC #** **INSURER A :** The Travelers Indemnity Company of America — 25666 **INSURER B :** **INSURER C :** **INSURER D :** **INSURER E :** **INSURER F :**

COVERAGES **CERTIFICATE NUMBER:** 779021828 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
	COMMERCIAL GENERAL LIABILITY ☐ CLAIMS-MADE ☐ OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: ☐ POLICY ☐ PRO-JECT ☐ LOC ☐ OTHER:						EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG [blank]	$ $ $ $ $ $ $
	AUTOMOBILE LIABILITY ☐ ANY AUTO ☐ OWNED AUTOS ONLY ☐ SCHEDULED AUTOS ☐ HIRED AUTOS ONLY ☐ NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident) [blank]	$ $ $ $ $
	☐ **UMBRELLA LIAB** ☐ OCCUR ☐ **EXCESS LIAB** ☐ CLAIMS-MADE ☐ DED ☐ RETENTION $						EACH OCCURRENCE AGGREGATE [blank]	$ $ $
A	**WORKERS COMPENSATION AND EMPLOYERS' LIABILITY** Y / N ANYPROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? ☐ **(Mandatory in NH)** If yes, describe under DESCRIPTION OF OPERATIONS below	N / A		UB-3L88586A-24-NG-G	3/1/2024	3/1/2025	X PER STATUTE ☐ OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $ 1,000,000 $ 1,000,000 $ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

CERTIFICATE HOLDER

For Information Only
Please Send Your Certificate Request To:
certificates@cottinghambutler.com
Or Fax To:
(563) 587-5990

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Hazardous Waste Permit No. 50267

EPA ID No. TXD055135388

ISWR No. 50267

Original Date of Issuance:
October 3, 1990

Renewal Date: August 12, 2002

Texas Commission on Environmental Quality
Austin, Texas

Permit for Industrial Solid Waste Management Site issued under provisions ofTexas Health and Safety Code ANN. Chapter 361 and Chapter 26 of the Texas Water Code

Name of Permittee:	SET Environmental, Inc. 5738 Cheswood Street Houston, Texas 77087
Site Owner:	SET Environmental, Inc. 5738 Cheswood Street Houston, Texas 77087
Registered Agent for Service:	Keith Hopson Brown McCarrol & Oaks Hartline 111 Congress Avenue Austin, TX 78701

Classification of Site:

Waste Classification:	Site Type:	Permit Type:
Hazardous	On-Site	Storage
Nonhazardous:	Off-Site	Processing
Industrial Class 1 waste		

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of Hazardous and Solid Waste Amendments of 1984 (HSWA) for which the Texas commission on Environmental Quality (TCEQ) has not been authorized. Those provisions marked witha double asterisk (**) stem from federal authority only.

This permit is granted subject to the terms and conditions of the permit, rules of the commission and other Orders of the commission, and laws of the State of Texas. This permit does not exempt the permittee from compliance with the Texas Clean Air Act. This permit will be valid until canceled, amended, modified or revoked by the commission, except that the authorization under the permit shall expire midnight, ten (10) years after the date of permit approval.

Issued Date: June 6, 2024

K Keel

For the Commission

Table of Contents

List of Tables:

List of Attachments:

Permit/Compliance Plan Acronyms

ACL.....Alternate Concentration Limit

AAL.....Attenuation Action Level(s)

ALR.....Action Leakage Rate

AMP.....Attenuation Monitoring Point

AOC.....Area(s) of Concern

APA.....Affected Property Assessment

APAR.....Affected Property Assessment Report

APOE.....Alternate Point of Exposure

Appendix VIII.....40 CFR 261, Appendix VIII (Identification and Listing of Hazardous Waste - Hazardous Constituents)

ASTM.....American Society for Testing and Materials

BGS.....Below Ground Surface

BLRA.....Baseline Risk Assessment

CAO.....Corrective Action Observation

CAS.....Corrective Action System

CCC.....Coastal Coordination Council

CEMS.....Continuous Emissions Monitoring System

CFR.....Code of Federal Regulations

CMI.....Corrective Measures Implementation

CMP.....Texas Coastal Management Program

CMS.....Corrective Measures Study

COC.....Constituent(s) of Concern

EPA.....United States Environmental Protection Agency

EPA SW-846.....Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, Third Edition, November 1986

GWPS.....Groundwater Protection Standard

HSWA.....Hazardous and Solid Waste Amendments of 1984

ICM.....Interim Corrective Measures

LDR.....Land Disposal Restrictions

MDL.....Method Detection Limit

MQL.....Method Quantitation Limit

MSL.....Mean Sea Level

NAPL.....Non-Aqueous Phase Liquid

NOR.....Notice of Registration

PCB.....Polychlorinated Biphenyl

PCL.....Protective Concentration Level

PMZ .....Plume Management Zone

POC.....Point of Compliance

POE.....Point of Exposure

ppm.....Parts Per Million

ppmv.....Parts Per Million by Volume

PQL.....Practical Quantitation Limit

Psi.....Pounds Per Square Inch

QA/QC.....Quality Assurance/Quality Control

RACR.....Response Action Completion Report

RAER.....Response Action Effectiveness Report

RAP.....Response Action Plan (for Action Leakage Rate in landfills)

RAP.....Remedial Action Plan

RCRA.....Resource Conservation and Recovery Act

RFA.....RCRA Facility Assessment

RFI.....RCRA Facility Investigation

RRR.....TCEQ Risk Reduction Rules

RRS.....Risk Reduction Standard

RSA.....Remedy Standard A

RSB.....Remedy Standard B

SR/WM.....Source Reduction and Waste Minimization

SSI.....Statistically Significant Increase

SWDA.....Solid Waste Disposal Act

SWMU.....Solid Waste Management Unit(s)

TAC.....Texas Administrative Code

TCEQ.....Texas Commission on Environmental Quality

TCEQ QAPP.....“Quality Assurance Project Plan for Environmental Monitoring and Measurement Activities Relating to the Resource Conservation and Recovery Act and Underground Injection Control”

THC.....Total Hydrocarbons

TRRP.....Texas Risk Reduction Program

I. Facility Description

A. Size and Location of Site

A permit is issued to SET Environmental, Inc. (hereafter called the permittee), to manage a hazardous waste facility located at 5738 Cheswood Street, Houston, in Harris County, Texas, and within the drainage area of Segment 1007 in the San Jacinto River Basin (North Latitude 29° 40' 32", West Longitude 95° 18' 24"). The legal description of the facility submitted in Permit No. 50267 application received November 8, 2022, is hereby made a part of this permit as "Attachment A." The hazardous waste management facility as delineated by the permittee's application map is hereby made a part of this permit as "Attachment B."

B. Incorporated Application Materials

This permit is based on, and the permittee shall follow the Part A and Part B Industrial & Hazardous Waste Application submittals, and the subsequent revisions to the permit and permit application that are listed in "Attachment C", and the Application Elements listed in "Attachment D", which are hereby approved subject to the terms of this permit and any other orders of the TCEQ.

These materials are incorporated into this permit by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this permit upon the date of approval by the commission.

II. General Facility Standards

A. Standard Permit Conditions

The permittee has a duty to comply with the Standard Permit Conditions under 30 Texas Administrative Code (TAC) Section 305.125. Moreover, the permittee has a duty to comply with the following permit conditions:

1. Modification of Permitted Facilities

The facility units and operational methods authorized are limited to those described herein and by the application submittals identified in Section I.B. All facility units and operational methods are subject to the terms and conditions of this permit and TCEQ rules. Prior to constructing or operating any facility units in a manner which differs from either the related plans and specifications contained in the permit application or the limitations, terms or conditions of this permit, the permittee must comply with the TCEQ permit amendment/ modification rules as provided in 30 TAC Sections 305.62 and 305.69.

2. Duty to Comply

The permittee must comply with all the conditions of this permit, except that the permittee need not comply with the conditions of this permit to the extent and for the duration such noncompliance is authorized in an emergency order issued by the commission. Any permit noncompliance, other than noncompliance authorized by an emergency order, constitutes a violation of the Resource Conservation and Recovery Act (RCRA) and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial

of a permit renewal application. [30 TAC Section 305.142]

3. Severability

The provisions of this permit are severable. If any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected.

4. Definitions

For purposes of this permit, terms used herein shall have the same meaning as those in 30 TAC Chapters 305, 335, and 350 unless this permit specifically provides otherwise; where terms are not defined in the regulations or the permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

Application data - data used to complete the final application and any supplemental information.

5. Permit Expiration

In order to continue a permitted activity after the expiration date of the permit the permittee shall submit a new permit application at least 180 days before the expiration date of the effective permit, unless permission for a later date has been granted by the executive director. Authorization to continue such activity will terminate upon the effective denial of said application.

6. Certification Requirements

For a new facility, the permittee may not commence storage, processing, or disposal of solid waste; and for a facility being modified, the permittee may not process, store or dispose of solid waste in the modified portion of the facility, except as provided in 30 TAC Section 305.69 (relating to Solid Waste Permit Modification at the Request of the Permittee) until the following has been accomplished [30 TAC Section 305.144]:

a. The permittee has submitted to the executive director and the local Regional Office of the TCEQ, by certified mail or hand delivery, a letter signed by the permittee, and signed and sealed by a Texas Professional Engineer stating that the facility has been constructed or modified in compliance with the permit. If the certification is being provided to document proper closure of a permitted unit, or to certify installation or repair of a tank system, then the certification must be signed and sealed by an independent Texas licensed Professional Engineer. Required certification shall be in the following form:

"This is to certify that the following activity (specify activity, e.g., construction, installation, closure, etc., of an item) relating to the following item (specify the item, e.g., the particular facility, facility unit, unit component, subcomponent part, or ancillary component), authorized or required by TCEQ Permit No. 50267 has been completed, and that construction of said facility component has been performed in accordance

with and in compliance with good engineering practices and the design and construction specifications of Permit No. 50267."

b. A certification report has been submitted, with the certification described in Provision II.A.6.a., which is logically organized and describes in detail the tests, inspections, and measurements performed, their results, and all otherbases for the conclusion that the facility unit, unit component, and/or closure have been constructed, installed and/or performed in conformance with the design and construction specifications of this permit and in compliance with this permit. The report shall describe each activity as it relates to each facility unit or component being certified including referenceto all applicable permit provisions. The report shall contain the following items, at a minimum:

(1) Scaled, as-built plan-view and cross-sectional drawings which accurately depict the facility unit and all unit components and subcomponents and which demonstrate compliance with the design and construction specifications approved and detailed in the terms of this permit;

(2) All necessary references to dimensions, elevations, slopes, construction materials, thickness and equipment; and

(3) For all drawings and specifications, the date, signature, and seal of a Professional Engineer who is licensed in the State of Texas.

c. The executive director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or if within fifteen (15) days of submission of the letter required by paragraph (a)of this section, the permittee has not received notice from the executive director of the intent to inspect, prior inspection is waived and the permittee may commence processing, storage, or disposal of solid waste.

7. Land Disposal Restrictions

The permittee shall comply with the land disposal restrictions as found in 40 Code of Federal Regulations (CFR) 268 and any subsequent applicable requirements promulgated through the Federal Register. Requirements include modifying/amending the permittee's waste analysis plan to include analyses to determine compliance with applicable treatment standards or prohibition levels, pursuant to 40 CFR 268.7(c) and 264.13(a).

8. Dust Suppression

Pursuant to 40 CFR 266.23(b)/30 TAC Section 335.214(b), the permittee shall not use waste, used oil, or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability) for dust suppression or road treatment.

9. Permit Reopener

This permit shall be subject to review by the executive director five (5) years from the date of permit issuance or reissuance and shall be modified as

necessary to assure that the facility continues to comply with currently applicable requirements of the Solid Waste Disposal Act (SWDA) and the rules and regulations of the commission. The permittee shall submit any information as may be reasonably required by the executive director to ascertain whether the facility continues to comply with currently applicable requirements of the SWDA and the rules and regulations of the commission.

10. Texas Coastal Management Program

The TCEQ has reviewed the permit application for consistency with the goals and policies of the Texas Coastal Management Program (CMP) in accordance with the regulations of the Coastal Coordination Council (CCC) and has determined that the permit is consistent with the applicable CMP goals and policies. [30 TAC Section 281.43(a)(1)]

11. Monitoring of Commercial Hazardous Waste Management Facility Operations

Within the first year after commission initial action on this permit and any subsequent amendment, modification, transfer, extension, or renewal of this permit, the permittee shall provide notice to affected persons of the intent to have an independent annual environmental audit of the facility performed. The notice shall be issued in accordance with the requirements of 30 TAC Section 305.147(1). If an affected party requests the audit, then the permittee must follow the requirements of 30 TAC Sections 305.147(2)-(6), and (8), for selecting an independent inspector, paying for the notice and audit, submission of a written report, and determining the scope of the inspection.

12. Failure to Submit Relevant Facts in Permit Application

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or any report to the executive director, the permittee shall promptly submit the correct information or facts to the executive director. [30 TAC Section 305.125(19)]

13. Hazardous Waste Combustion Facility Provision (Reserved)

14. Waste Management Fee Assessment, Fee Payment, and Records and Reporting

a. If applicable, the permittee is subject to the assessment of fees for hazardous wastes which are stored, processed, disposed, or otherwise managed and for Class 1 industrial wastes which are disposed at a commercial facility. [30 TAC Section 335.325]

b. As applicable and except as provided in Provision II.A.14.c., the permittee shall pay waste management fees monthly. Monthly fee payments shall be due by the 25th day following the end of the month for which payment is due. [30 TAC Section 335.328(b)]

c. If required, the permittee owes waste management fees in an amount less than $500 for a calendar month or less than $1,500 for a calendar quarter,the permittee may file a quarterly report and pay a quarterly fee. [30 TACSection 335.328(c)]

d. If required, the permittee shall document the basis for the assessment of any applicable waste management fees, including any adjustment to or exemption from assessment. [30 TAC Section 335.329(b)(4)]

e. If required, the permittee shall submit a monthly report of on-site waste management activities subject to the assessment of waste management fees on forms furnished or approved by the executive director. This report shall be due by the 25th day following the end of the month (or quarter) for which a report is made. Monthly (or quarterly) reports shall be submitted, regardless of whether any storage, processing, or disposal was made during a particular month (or quarter), by preparing and submitting a summary indicating that no waste was managed during that month (or quarter). [30 TAC Section 335.329(b)(5)]

f. As applicable, the permittee shall maintain the required records and reports in accordance with 30 TAC Sections 335.329(c) and (d).

15. Transfer of Ownership and/or Operational Control

The transfer of ownership and/or operational control of this permit is subject to the transfer requirements of 30 TAC Section 305.64 and permit modification requirements of 30 TAC Section 305.69. The new owner and/or operator seeking a transfer of ownership and/or operational control of this permit shall submit a Class 1[1] permit modification (with prior written approval by the executive director) at least 90 days prior to the scheduled transfer in accordance with 30 TAC Section 305.69(b)(2). Prior to the executive director issuing the permit modification transferring the permit, the new owner or operator shall provide a fully executed financial assurance mechanism satisfactory to the TCEQ executive director, for all existing units which have received waste and any corrective action required under this permit, in compliance with 30 TAC Chapter 37, Subchapter P. [30 TAC Section 305.64(g)]

B. Recordkeeping and Reporting Requirements

1. Monitoring and Records

a. All data submitted to the TCEQ shall be in a manner consistent with the latest version of the "Quality Assurance Project Plan for Environmental Monitoring and Measurement Activities Relating to the Resource Conservation and Recovery Act and Underground Injection Control" (TCEQ QAPP).

b. Monitoring samples and measurements shall be taken at times and in a manner so as to be representative of the monitored activity. The method used to obtain a representative sample of the material to be analyzed shall be the appropriate method from Appendix I of 40 CFR Part 261 or an equivalent method approved in writing prior to use by the executive director of the TCEQ. Laboratory methods shall be the latest version specified in current edition of Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846 (EPA SW-846); Standard Methods for the Examination of Water and Wastewater; RCRA Groundwater Monitoring: DraftTechnical Guidance, 1992, OSWER Directive 9950.1; or an equivalent method; as specified in the Waste Analysis Plan, Section IV of the Part B Application, and approved in writing prior to use by the

executive director. [30 TAC Section 305.125(11)(A)]

c. The permittee shall retain in an organized fashion and furnish to the executive director, upon request, records of all monitoring information, copies of all reports and records required by this permit, and the certification required by 40 CFR 264.73(b)(9), for a period of at least three (3) years from the date of the sample, measurement, report, record, certification, or application. [30 TAC Section 305.125(11)(B)]

d. Records of monitoring shall include the following [30 TAC Section 305.125(11)(C)]:

(1) The date, time, and place of sample or measurement;

(2) The identity of individual who collected the sample or measurement;

(3) The dates analyses were performed;

(4) The identity of individual and laboratory who performed the analyses;

(5) The analytical techniques or methods used; and

(6) The results of such analyses or measurements.

e. All engineering and geoscientific information submitted to the TCEQ shall beprepared by, or under the supervision of, a licensed professional engineer orlicensed professional geoscientist, and shall be signed, sealed, and dated by qualified professionals as required by the Texas Engineering Practice Act and the Texas Geoscience Practice Act and the licensing and registration boards under these acts.

2. Operating Record

In addition to the recordkeeping and reporting requirements specified elsewhere in this permit, the permittee shall maintain a written operating record at the facility, in accordance with 40 CFR 264.73. These records will be made available to representatives of the TCEQ upon request.

3. Retention of Application Data

Throughout the terms of the permit, the permittee shall keep records of data used to complete the final application and any supplemental information. All copies of renewals, amendments, revisions and modifications must also be kept at the facility such that the most current documents are available for inspection at all times. All materials, including any related information, submitted to complete the application shall be retained, not just those materials which have been incorporated into the permit. [30 TAC Section 305.47]

4. Reporting of Noncompliance

The permittee shall report to the executive director of the TCEQ information regarding any noncompliance which may endanger human health or the environment. [30 TAC Section 305.125(9)]

a. Report of such information shall be provided orally within twenty-four (24) hours from the time the permittee becomes aware of the noncompliance.

b. A written submission of such information shall also be provided within five (5) days of the time the permittee becomes aware of the noncompliance. The written submission shall contain the following:

(1) A description of the noncompliance and its cause;

(2) The potential danger to human health or safety, or the environment;

(3) The period of noncompliance, including exact dates and times;

(4) If the noncompliance has not been corrected, the anticipated time it is expected to continue; and

(5) Steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance, and to mitigate its adverse effects.

5. Twenty-Four Hour Reporting

The following shall be included as information which must be reported orally within twenty-four (24) hours pursuant to 30 TAC Section 305.125(9) [30 TAC Section 305.145]:

a. Information concerning release of any solid waste that may cause an endangerment to public drinking water supplies; and

b. Any information of a release or discharge of solid waste, or of a fire or explosion which could threaten the environment or human health or safety,outside the facility. The description of the occurrence and its cause shall include:

(1) Name, address, and telephone number of the owner or operator;

(2) Name, address, and telephone number of the facility;

(3) Date, time, and type of incident;

(4) Name and quantity of material(s) involved;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to the environment and human health or safety outside the facility, where this is applicable; and

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

6. Notice Waiver

The executive director may waive the five (5) day written notice requirement specified in Provision II.B.4.b. in favor of a written report submitted to the

commission within fifteen (15) days of the time the permittee becomes aware of the noncompliance or condition. [30 TAC Section 305.145(b)]

7. Biennial Report

The permittee shall prepare and submit to the executive director all information and records required by 40 CFR 264.75. By March 1st of each even-numbered year for the preceding odd-numbered year's activities the permittee shall submit either a Biennial Report or letter certifying submission of the above. One copy of the report/letter shall be submitted to the TCEQ Industrial & Hazardous Waste Permits Section and an additional copy shall be submitted to the appropriate TCEQ Regional Office.

8. Pollution Prevention

Facilities subject to 30 TAC Chapter 335, Subchapter Q - Pollution Prevention: Source Reduction and Waste Minimization must prepare a five (5) year Source Reduction and Waste Minimization Plan and submit a Source Reduction and Waste Minimization (SR/WM) Annual Report to the TCEQ Environmental Assistance Division. This report must be submitted annually on the dates specified in the rule.

9. Annual Detection Monitoring Report (Reserved)

10. Manifest Discrepancy Report

If a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy. If not resolved within fifteen (15) days,the permittee must submit a report, describing the incident, to the executive director, as per the requirements of 30 TAC Section 335.12. A copy of the manifest must be included in the report.

11. Unmanifested Waste Report

A report must be submitted to the executive director within fifteen (15) days of receipt of unmanifested waste, as per the requirements of 30 TAC Section 335.15(3).

12. Monthly Summary

The permittee shall prepare a monthly report, of all manifests received during the month, summarizing the quantity, character, transporter identity, and the method of storage, processing and disposal of each hazardous waste or Class 1 waste shipment received, itemized by manifest document number. This monthly summary report shall be submitted to the TCEQ Registration and Reporting Section on or before the 25th day of each month for waste received during the previous month. [30 TAC Section 335.15(2)]

13. Annual Unsaturated Zone Monitoring Report (Reserved)

14. Annual Zone of Incorporation Monitoring Report (Reserved)

C. Incorporated Regulatory Requirements

1. State Regulations

The following TCEQ regulations are hereby made provisions and conditions of the permit to the extent applicable to the activities authorized by this permit.

- 30 TAC Chapter 37, Subchapter P: Financial Assurance for Hazardous and Nonhazardous Industrial Solid Waste Facilities;
- 30 TAC Chapter 305, Subchapter A: General Provisions;
- 30 TAC Chapter 305, Subchapter C: Application for Permit;
- 30 TAC Sections 305.61 - 305.69 (regarding amendments, renewals,transfers, corrections, revocation and suspension of permits);
- 30 TAC Sections 305.121 - 305.125 (regarding permit characteristics and conditions);
- 30 TAC Sections 305.127 - 305.129 (regarding permit conditions, signatories and variance procedures);
- 30 TAC Chapter 305, Subchapter G: Additional Conditions for Hazardous and Industrial Solid Waste Storage, Processing and Disposal Permits;
- 30 TAC Chapter 305, Subchapter I: Hazardous Waste Incinerator Permits;
- 30 TAC Chapter 305, Subchapter J: Permits for Land Treatment Demonstrations Using Field Tests or Laboratory Analyses;
- 30 TAC Chapter 305, Subchapter K: Research, Development and Demonstration Permits;
- 30 TAC Chapter 305, Subchapter Q: Permits for Boilers and Industrial Furnaces Burning Hazardous Waste;
- 30 TAC Chapter 335, Subchapter A: Industrial Solid Waste and Municipal Hazardous Waste in General;
- 30 TAC Chapter 335, Subchapter B: Hazardous Waste Management General Provisions;
- 30 TAC Section 335.152, Standards;
- 30 TAC Sections 335.153 - 335.155 (regarding reporting of emergency situations and additional reports required);
- 30 TAC Sections 335.156 - 335.167 (regarding applicability of groundwater monitoring programs and corrective action requirements);
- 30 TAC Sections 335.168 - 335.169 (regarding the design and operating requirements and closure and post-closure care of surface impoundments);
- 30 TAC Section 335.170 (regarding the design and operating requirements of waste piles);

- 30 TAC Sections 335.171 - 335.172 (regarding the design and operating requirements and closure and post-closure care of land treatment units);
- 30 TAC Sections 335.173 - 335.174 (regarding the design and operating requirements and closure and post-closure care of landfills);
- 30 TAC Sections 335.175 - 335.176 (regarding special requirements for containers and bulk and containerized waste);
- 30 TAC Sections 335.177 - 335.179 (regarding general performancestandard, cost estimate for closure, and financial assurance);
- 30 TAC Section 335.221 (regarding hazardous waste burned for energy recovery);
- 30 TAC Sections 335.325, 335.328 and 335.329 (regarding waste management fee assessment, fee payment, and records and reports);
- 30 TAC Chapter 335, Subchapter Q: Pollution Prevention: Source Reduction and Waste Minimization; and
- 30 TAC Chapter 350, Texas Risk Reduction Program.

Issuance of this permit with incorporated rules in no way exempts the permittee from compliance with any other applicable state statute and/or commission Rule.

2. Federal Regulations

The following provisions of 40 CFR Parts 264, 266 Subpart H, 266 Subpart M, and Part 268, adopted by reference by 30 TAC Section 335.152, 30 TAC Section 335.221(a), and 335 Subchapter O, are hereby made provisions and conditions of this permit, as applicable, to the extent consistent with the Texas Solid Waste Disposal Act, Texas Health and Safety Code Ann., Chapter 361 (Vernon), and the rules of the TCEQ:

- Subpart B -- General Facility Standards;
- Subpart C -- Preparedness and Prevention;
- Subpart D -- Contingency Plan and Emergency Procedures;
- Subpart E -- Manifest System, Recordkeeping, and Reporting;
- Subpart G -- Closure and Post-Closure;
- Subpart H -- Financial Requirements;
- Subpart I -- Use and Management of Containers;
- Subpart J -- Tank Systems;
- Subpart K -- Surface Impoundments;

- Subpart L -- Waste Piles;
- Subpart M -- Land Treatment;
- Subpart N -- Landfills;
- Subpart O -- Incinerators;
- Subpart X -- Miscellaneous Units;
- Subpart AA -- Air Emission Standards for Process Vents;
- Subpart BB -- Air Emission Standards for Equipment Leaks;
- Subpart CC -- Air Emission Standards for Tanks, Surface Impoundments, and Containers;
- Subpart DD -- Containment Buildings;
- Subpart EE -- Hazardous Waste Munitions and Explosives Storage;
- 40 CFR Part 266 Subpart H -- Hazardous Waste Burned in Boilers and Industrial Furnaces; and
- 40 CFR Part 268 -- Land Disposal Restrictions (LDR).

III. Facility Management

A. Operation of Facility

The permittee shall construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, as required by 40 CFR 264.31. All equipment and structures used to manage hazardous waste at the facility shall be maintained in proper operating condition.

B. Personnel Training

The permittee shall ensure that all facility personnel involved with hazardous waste management successfully complete a training program as required by 40 CFR 264.16. The permittee shall maintain training documents and records, as required by 40 CFR 264.16(d) and (e).

C. Security

1. The permittee shall provide a twenty-four (24) hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; or
2. The permittee shall provide and maintain an artificial or natural barrier which completely surrounds the active waste management portion(s) of the facility and shall have a means to control entry, at all times, through gates or other entrances to these same facility areas; and

3. The permittee shall post warning signs at all points of access to the active waste management portion(s) of the facility and along the natural and/or artificial barriers in sufficient numbers to be seen from any approach to that (those) portion(s) of the facility. The signs shall be printed so that they may be clearly read from a distance of at least twenty-five (25) feet, and shall state "Danger - Unauthorized Personnel Keep Out" in English and in an alternate language per 40 CFR 264.14(c), as applicable.

D. General Inspection Requirements

The permittee shall follow the inspection schedule contained in the permit application submittals identified in Section I.B. of this permit and as set out in Table III.D. - Inspection Schedule. The permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by 40 CFR 264.15(c). Records of inspection shall be kept, as required by 40 CFR 264.15(d). Any remedial actions taken in response to facility inspections and the date of the remediation shall be included in the inspection records.

E. Contingency Plan

1. The permittee shall follow the Contingency Plan, developed in accordance with 40 CFR Part 264 Subpart D, and contained in the permit application submittals identified in Section I.B. of this permit. Copies of this plan shall be available to all employees involved in waste management at the facility.

2. The permittee shall immediately initiate clean-up procedures for removal of any spilled hazardous or industrial nonhazardous wastes and waste residues and shall take all steps necessary to prevent surface water or groundwater contamination as a result of any spills.

3. Collected hazardous or industrial nonhazardous wastes, spills, leaks, clean-up residues, and contaminated rainfall runoff, including contaminated stormwater from the drainage control system(s) associated with the permitted units, shall be removed promptly after the spillage and/or rainfall event in as timely a manner as is necessary to prevent overflow of the system by the following method(s):

    a. Removal to an on-site authorized facility unit;

    b. Removal to an authorized industrial solid waste management facility or authorized off-site facility; or

    c. Discharge in accordance with a wastewater discharge permit.

4. The permittee shall ensure that any equipment or vehicles which have come in contact with waste in the loading/unloading, storage, processing, and/or disposal areas have been decontaminated prior to their movement into designated uncontaminated areas of the site property. At a minimum, all contaminated equipment shall be externally decontaminated and contaminated vehicles shall have their undercarriages and tires or tracks decontaminated to remove all waste residues and to prevent contamination of uncontaminated areas. All wash water generated shall be collected and disposed of in accordance with Provision III.E.3.

5. Preparedness and Prevention

a. At a minimum, the permittee shall equip the facility as set forth in Table III.E.3. - Emergency Equipment contained in the permit application identified in Section I.B. of this permit, as required by 40 CFR 264.32.

b. All sumps, pumps, fire- and spill-control equipment, decontamination equipment, and all other equipment and structures authorized or required through the Contingency Plan shall be tested and maintained, as necessary, to assure its proper operation in time of emergency, as required by 40 CFR 264.33.

c. The permittee shall maintain access to the communications or alarm system,as required by 40 CFR 264.34.

d. A trained emergency coordinator shall be available at all times in case of an emergency and will have the responsibility for coordinating all emergency response measures as required by 40 CFR 264.55 and 264.56. Emergency number(s) shall be posted in all waste management portions of the facility and all employees in those areas shall be trained in the location of those postings.

IV. Waste and Waste Analysis

A. Waste Analysis Plan

The permittee shall follow the Waste Analysis Plan, developed in accordance with40 CFR 264.13 and the permit application identified in Section I.B. of this permit.

B. Authorized Wastes

1. The permittee is authorized to manage hazardous and nonhazardous industrial and municipal solid wastes listed in Table IV.B. - WastesManaged in Permitted Units, subject to the limitations provided herein. Wastes authorized for storage and processing include those generated from facility sources and from off-site sources.

2. Hazardous and Nonhazardous Waste Received From Off-Site Sources

When authorized wastes include hazardous or nonhazardous waste from an off-site source (except where the permittee is also the generator), as described in the Part B application, Section IV, the permittee shall inform the generator in writing that the permittee has the appropriate permits and will accept the waste the generator is shipping. The permittee shall keep a copy of this written notice as part of the operating record. [40 CFR 264.12(b)]

3. The wastes authorized in Table IV.B. shall not contain any of the following unless authorized:

a. PCB waste, as defined by the Environmental Protection Agency (EPA) in regulations issued pursuant to the Toxic Substances Control Act under 40 CFR Part 761, unless the permittee is compliant with the federal requirements for PCB storage as specified in 40 CFR Part 761;

b. Radioactive materials/wastes unless the permittee is authorized to store and process these wastes in compliance with specific licensing and

permitting requirements under Chapter 401 of the Texas Health and Safety Code. In accordance with 30 TAC Section 336.203, no person shall dispose of radioactive material unless that person has a license or an exemption from the Texas Commission on Environmental Quality (TCEQ) under Texas Health and Safety Code, Section 401.106(a);

c. Explosive material, as defined by the Department of Transportation under 49 CFR Part 173;

d. Dioxin-containing wastes, identified by EPA as F020, F021, F022, F023, F026, and F027 wastes in 40 CFR 261.31;

e. Garbage as defined in 30 TAC Section 330.3;

f. Municipal Solid Waste that is composed of garbage, rubbish, ashes, street cleanings, used tires, dead animals and abandoned automobiles;

g. Putrescible Waste as defined in 30 TAC Section 330.3; or

h. Special Waste from Health-Care Related Facilities subject to 25 TAC Part 1 or 30 TAC Chapter 326.

4. Prior to accepting any additional wastes not authorized in Table IV.B., the permittee shall follow the permit amendment or modification requirements listed in 30 TAC Sections 305.62 and 305.69.

5. The permittee may store wastes restricted under 40 CFR Part 268 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of 40 CFR 268.50(a)(2) including, but not limited to the following:

   a. Clearly marking each container to identify its contents and the date each period of accumulation begins; and

   b. Clearly marking each tank with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at that facility.

C. Sampling and Analytical Methods

1. Table IV.C. - Sampling and Analytical Methods, shall be used in conjunction with the Waste Analysis Plan referenced in Section IV.A. of this permit, in performing all waste analyses.

2. The permittee shall ensure that all waste analyses utilized for waste identification or verification have been performed in accordance with methods specified in the current editions of EPA SW-846, American Society for Testing and Materials (ASTM) or other methods accepted by the TCEQ. The permittee shall have a Quality Assurance/Quality Control (QA/QC) program that is consistent with EPA SW-846 and the TCEQ QAPP.

V. Authorized Units and Operations

A. Authorized Units

1. The permittee is authorized to operate the permitted facility units listed in "Attachment E" in accordance with terms and conditions of this permit and subject to the limitations herein. All waste management activities not otherwise exempted from permitting under 30 TAC Section 335.2 shall be confined to the authorized facility units subject to permitting listed in "Attachment E." References hereinafter in this permit to "TCEQ Permit Unit No. ____" shall be to the authorized permitted facility units listed in "Attachment E." All authorized units must be clearly identified as numbered in "Attachment E." These units must have signs indicating "TCEQ Permit Unit No. ____."

2. The permittee shall comply with 40 CFR 264.17, relating to general requirements for ignitable, reactive, or incompatible wastes.

3. The permittee shall prevent inundation of any permitted units and prevent any discharges of any waste or runoff of waste contaminated stormwater from permitted units. Additionally, each loading or unloading area, associated with a permitted hazardous or nonhazardous waste management unit, shall be provided with a drainage control system which will collect spills and precipitation in such a manner as to satisfy the following:

   a. Preclude the release from the system of any collected spills, leaks or precipitation;

   b. Minimize the amount of rainfall that is collected by the system; and

   c. Prevent run-on into the system from other portions of the facility.

4. The permittee shall construct, operate, and maintain the facility to prevent washout of any hazardous waste by a 100-year flood, as required by 40 CFR 264.18(b)(1).

B. Container Storage Areas

1. Container storage areas and their management method are shown in Table V.B. - Container Storage Areas. The permittee is authorized to operate the facility container storage areas subject to the limitations contained herein.

2. Containers holding hazardous waste shall be managed in accordance with 40 CFR 264.171, Condition of containers; 40 CFR 264.172, Compatibility of waste with containers; and 40 CFR 264.173, Management of containers.

3. The permittee shall construct and maintain the containment systems for the container storage areas in accordance with the drawings and details included in the Part B Application identified in Section I.B. At a minimum, the containment system must meet the requirements of 40 CFR 264.175.

4. The permittee must comply with the requirements of 40 CFR Part 264, Subpart CC, as applicable.

C. Tanks and Tank Systems

1. The permitted tank units and their approved waste types are shown in Table V.C. - Tanks and Tank Systems. The permittee is authorized to operate the permitted tank units for storage and processing subject to the limitations contained herein.

2. The permittee shall not place hazardous waste or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. [40 CFR 264.194(a)]

3. The permittee shall prevent spills and overflows from the tank or containment system as per the requirements of 40 CFR 264.194(b).

4. Secondary containment systems must be provided with a leak-detection system that is operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within twenty-four (24) hours.

5. The permittee shall report to the executive director within twenty-four (24) hours of detection when a leak or spill occurs from the tank system or secondary containment system to the environment. [40 CFR 264.196(d)(1)] (A leak or spill of one pound or less of hazardous waste that is immediately contained and cleaned-up need not be reported.) [40 CFR 264.196(d)(2)] (Releases that are contained within a secondary containment system need not be reported.)

6. Within thirty (30) days of detecting a release to the environment from the tank system or secondary containment system, the permittee shall report the following information to the executive director: [40 CFR 264.196(d)(3)]

    a. Likely route of migration of the release;

    b. Characteristics of the surrounding soil (including soil composition, geology, hydrology, and climate);

    c. Results of any monitoring or sampling conducted in connection with the release. If the permittee finds it will be impossible to meet this time period, the permittee shall provide the executive director with a schedule of when the results will be available. This schedule must be provided before the required thirty (30) day submittal period expires;

    d. Proximity of downgradient drinking water, surface water, and populated areas; and

    e. Description of response actions taken or planned.

7. The permittee shall submit to the executive director all certifications of major repairs to correct leaks within seven (7) days of returning the tank system to use. [40 CFR 264.196(f)]

8. The permittee must comply with the requirements of 40 CFR Part 264, Subpart CC, as applicable.

D. Surface Impoundments (Reserved)

E. Waste Piles (Reserved)

F. Land Treatment Units (Reserved)

G. Landfills (Reserved)

H. Incinerators (Reserved)

I. Boilers/Industrial Furnaces (Reserved)

J. Drip Pads (Reserved)

K. Miscellaneous Units (Reserved)

L. Containment Buildings (Reserved)

VI. Groundwater Detection Monitoring (Reserved)

A. Groundwater Monitoring Program (Reserved)

B. Construction, Certification, and Plugging (Reserved)

C. Detection Monitoring System Operation (Reserved)

D. Sampling and Analysis (Reserved)

E. Response Requirements for SSI (Reserved)

F. Revised Detection Monitoring Program (Reserved)

G. Annual Detection Monitoring Reporting Requirements (Reserved)

H. Record Keeping Requirements (Reserved)

I. Compliance Scheduling Requirements (Reserved)

VII. Closure and Post-Closure Requirements

A. Facility Closure

1. The permittee shall follow the closure plan, developed in accordance with 40 CFR Part 264 Subpart G for hazardous waste management units, and the approved Closure Plan for nonhazardous waste management units, and contained in the permit application submittals identified in Section I.B except as modified in Section VII of this permit.

   In addition, facility closure shall commence:

   a. Upon direction of the TCEQ for violation of the permit, TCEQ rules, or state statutes; or

   b. Upon suspension, cancellation, or revocation of the terms and conditions of this permit concerning the authorization to receive, store, process, or dispose of waste materials; or

   c. Upon abandonment of the site; or

d. Upon direction of the TCEQ for failure to secure and maintain an adequate bond or other financial assurance as required by Provision VII.B.1.

2. Request for Permit Modification or Amendment

The permittee shall submit a written request for a permit modification or amendment to authorize a change in the approved closure Plan(s), in accordance with 40 CFR 264.112(c). The written request shall include a copy of the amended closure Plan(s) for approval by the executive director.

3. Time Frames for Modification/Amendment Request Submittal

The permittee shall submit a written request for a permit modification or amendment in accordance with the time frames in 40 CFR 264.112(c)(3).

4. Closure Notice and Certification Requirements

a. The permittee shall notify the executive director, in writing, at least sixty (60) days prior to the date on which he expects to begin partial or final closure of a surface impoundment, or landfill unit, or final closure of a facility with such a unit; or at least forty-five (45) days prior to the date on which he expects to begin partial or final closure of a facility with processing or storage tanks, container storage, or incinerator units; or at least forty-five (45) days prior to the date on which he expects to begin partial or final closure of a boiler or industrial furnace, whichever is earlier. A copy of the notice shall be submitted to the TCEQ Regional Office.

b. The permittee shall notify the TCEQ Regional Office at least ten (10) days prior to any closure sampling activity required by the permit in order to afford regional personnel the opportunity to observe these events and collect samples.

5. Unless the executive director approves an extension to the closure period, as per the requirements of 40 CFR 264.113(b), the permittee must complete partial and final closure activities within 180 days after receiving the final known volume of hazardous wastes at the hazardous waste management unit or facility.

6. As per the requirements of 40 CFR 264.115, within sixty (60) days of completion of closure of each permitted hazardous waste surface impoundment, or landfill unit, and within sixty (60) days of the completion of final closure, the permittee shall submit to the executive director, by registered mail, with a copy to the TCEQ Regional Office, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure Plan and this permit. The certification, which shall be signed by the permittee and by a Professional Engineer licensed in Texas, must be in the form described in Provision II.A.6. A closure certification report shall be submitted with the required certifications which includes a summary of the activities conducted during closure and the results of all analyses performed. The certification report shall contain the information required by Provision II.A.6 and 30 TAC Section 350.32 (Texas Risk Reduction Program (TRRP) Remedy Standard A) and 30 TAC Section 350.33 (TRRP, Remedy Standard B) and 30 TAC Section 350.95 (response Action Completion Report (RACR), as applicable.

Documentation supporting the licensed Professional Engineer's certification shall be furnished to the executive director upon request until the executive director releases the permittee from the financial assurance requirements for closure under 40 CFR 264.143(i).

7. For each disposal unit closed after permit issuance, the permittee shall submit documentation to demonstrate compliance with 40 CFR 264.116 (relating to survey plat) and 264.119 (relating to post-closure notices). Documentation to demonstrate compliance with survey plat requirements must be submitted to the TCEQ at the time of submission of the certification of closure. Documentation to show compliance with post-closure notices must be submitted to the TCEQ no later than sixty (60) days after certification of closure.

8. Final closure is considered complete when all hazardous waste management units at the facility have been closed in accordance with all applicable closure requirements so that hazardous waste management activities under 40 CFR Parts 264 and 265 are no longer conducted at the facility unless subject to the provisions in 40 CFR 262.16 and 40 CFR 262.17.

9. All units, sumps, pumps, piping and any other equipment or ancillary components which have come in contact with hazardous wastes shall either be decontaminated by removing all waste, waste residues, and sludges or be disposed of at an authorized unit at this facility or at an authorized off-site facility.

10. All equipment/structures and liners (i.e., debris), contaminated with hazardous waste, and intended for land disposal shall be treated in a manner which meets or exceeds the treatment standards for hazardous debris contained in 40 CFR268.45 or removed and managed at an authorized industrial solid waste management facility. All contaminated dikes and soils intended for land disposal shall be treated in a manner which meets or exceeds the treatment standards for hazardous soils contained in 40 CFR 268.49 or removed and managed at an authorized industrial solid waste management facility.

11. All hard-surfaced areas within the hazardous waste management unit areas shall be decontaminated and the wash water generated treated and/or disposed at an authorized unit at this facility or at an authorized off-site facility.

12. Verification of decontamination shall be performed by analyzing wash water, and as necessary, soil samples for the hazardous constituents which have been in contact with the particular item being decontaminated. In addition, the permittee shall perform visual inspections of the equipment/structures for visible evidence of contamination.

13. Unless it can be demonstrated that soil contamination has not occurred, soils shall be sampled and analyzed. Sufficiently detailed analyses of samples representative of soils remaining in non-hard-surfaced areas of the storage and processing facility area shall be performed to verify removal or decontamination of all waste and waste residues.

14. Soil and/or wash water samples shall be analyzed using laboratory methods specified in Provision II.B.1.b. Equivalent or modified methods must be specified in the closure plan and have written approval of the executive director prior to

use. All data submitted to the TCEQ shall be in a manner consistent with the latest version of the TCEQ QAPP.

15. Decontamination shall be deemed complete when no visible evidence of contamination is observed and when the results from verification sampling and analyses for wash water and soil meet the following criteria:

    a. Decontamination of hard-surfaced areas used for waste management (such as tank interiors, secondary containment structures, ancillary equipment, sumps, loading/unloading docks, etc.) shall be deemed complete when the concentration of each chemical of concern in the final rinsate sample(s) collected from the wash water is below TCEQ Texas Risk Reduction Program (TRRP), Remedy Standard A, Tier 1 Residential Class 1 Groundwater PCL; and

    b. Unless it can be demonstrated that soil contamination has not occurred, underlying soils shall be decontaminated or removed to the TRRP Remedy Standard A, Residential PCL, for no further action. If the underlying soils are decontaminated or removed to the PCL for Remedy Standard A, Commercial/Industrial Land use, the permittee shall comply with the institutional controls requirements of 30 TAC Section 350.111, as required.

B. Financial Assurance for Closure

1. The permittee shall provide financial assurance for closure of all existing permitted units covered by this permit in an amount not less than as shown on Table VII.E.1 - Permitted Unit Closure Cost Summary. Financial assurance shall be secured and maintained in compliance with 30 TAC Chapter 37, Subchapter P; and 30 TAC Section 335.179. Financial assurance is subject to the following:

    a. Adjustments to Financial Assurance Amount

    (1) At least sixty (60) days prior to acceptance of waste in proposed permitted units listed in Table VII.E.1 - Permitted Unit Closure Cost Summary, the permittee shall increase the amount of financial assurance required for closure by the amounts listed in Table VII.E.1. and shall submit additional financial assurance documentation.

    (2) The amount of financial assurance for closure of existing units, may be reduced by the amount listed in Table VII.E.1. - Permitted Unit Closure Cost Summary, upon certification of closure of an existing permitted unit, in accordance with Provisions VII.A.4 and VII.A.6, and upon written approval of the executive director.

    b. Annual Inflation Adjustments

    Financial assurance for closure, including any adjustments after permit issuance, shall be corrected for inflation according to the methods described by 30 TAC Sections 37.131 and 37.141.

2. The permittee shall submit to the executive director, upon request, such information as may be required to determine the adequacy of the financial assurance.

C. Storage, Processing, Combustion Unit and Land Treatment Unit Closure Requirements

The permittee shall close the storage, processing, combustion units, and Land Treatment units identified in Attachment E within 90 days after receiving the final volume of waste, or a later date approved by the executive director, in accordance with the closure plan incorporated in Section I.B, 40 CFR Part 264, Subpart G, 40 CFR 264.178 (container storage), 264.197 (tanks), 264.351 (incinerators), 266.102(e) (11), 266.102(a)(2)(vii), (boilers & industrial furnaces), and 264.280 (land treatment unit), as applicable and the Texas Risk Reduction Program of 30 TAC Chapter 350 and the following requirements.

If all contaminated soils cannot be removed or decontaminated to TRRP Remedy Standard A (RSA), the permittee shall close the tank system and perform post-closure care in accordance with the closure and post-closure requirements for landfills, 30 TAC Section 335.152(a)(5) and 30 TAC Chapter 350, Subchapter B, and an approved contingent closure and post-closure plan no later than sixty (60) days (closure plan) or ninety (90) days (post- closure care plan) from the date that the permittee or the executive director determines that the hazardous waste management unit must be closed as a landfill, subject to the requirements of 30 TAC Section 335.174, or no later than sixty (60) days (closure plan) from that date if the determination is made during partial or final closure. Within ninety (90) days of determining that the tank system must be closed as a landfill, the permittee shall submit a permit modification for closure and post-closure as a landfill.

D. Surface Impoundment Closure Requirement (Reserved)

E. Landfill Closure and Certification Requirements (Reserved)

F. Containment Buildings Closure Requirements (Reserved)

G. Facility Post-Closure Care Requirements (Reserved)

H. Financial Assurance for Post-Closure (Reserved)

VIII. Liability Requirements

A. Sudden and Nonsudden Accidental Occurrences

The permittee shall demonstrate continuous compliance with the requirements of 30 TAC Chapter 37 Subchapter P and 30 TAC Section 335.152(a)(6) to maintain liability coverage for sudden accidental occurrences of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense cost.

B. Incapacity of Owners or Operators, Guarantors, or Financial Institutions

The permittee shall comply with 30 TAC Section 37.71, regarding bankruptcy, whenever necessary.

IX. Corrective Action for Solid Waste Management Units

A. Notification of Release from Solid Waste Management Unit

If a solid waste management unit (SWMU) or area of contamination not previously addressed in the RCRA Facility Assessment (RFA) dated October 19, 1988, or any release of hazardous waste or hazardous constituents that may have occurred from any SWMU and/or Area of Concern (AOC), that is discovered subsequent to issuance of this permit, the permittee shall notify the executive director in writing within fifteen (15) days of the discovery. Within forty-five (45) days of such discovery, the permittee shall submit an RFA for that unit or release which shall be based on EPA's RCRA Facility Assessment Guidance, October 1986, NTIS PB 87-107769. If the RFA indicates a release or suspected release warrants further investigation, the permittee shall comply with the requirements of Section IX.B.

B. Corrective Action Obligations

The permittee shall conduct corrective action as necessary to protect human health and the environment for all releases of hazardous waste, hazardous constituents listed in Appendix VIII and/or 40 CFR Part 264, Appendix IX and/or other COCs from any SWMU and/or AOC according to 30 TAC Section 335.167. Corrective action shall consist of an Affected Property Assessment (APA), determination of protective concentration levels, selection of a remedy standard (if necessary), development and implementation of a response action (if necessary), and submittal of required reports according to 30 TAC Chapter 350.

In the case of SWMUs and/or AOCs that have been grandfathered under 30 TAC Chapter 335, Subchapters A and S, Risk Reduction Standards (RRS), corrective action shall consist of the RCRA Facility Investigation (RFI) and if necessary, Interim Corrective Measures (ICM), Baseline Risk Assessment (BLRA), Corrective Measures Study (CMS) and Corrective Measures Implementation (CMI). For grandfathered SWMUs and/or AOCs, the permittee may continue to complete the corrective action requirements under 30 TAC Chapter 335, Subchapters A and S, provided the permittee complies with the notification and schedule requirements pursuant to 30 TAC Sections 335.8 and 350.2(m). If on the basis of the RFI/APA, it is determined that COCs have been or are being released into the environment, the permittee may be required to conduct necessary ICMs and/or corrective actions.

Upon executive director's review of the Corrective Action Program obligations, the permittee may be required to perform any or all of the following:

1. Conduct investigation(s);

2. Provide additional information;

3. Conduct additional investigation(s);

4. Investigate an additional unit(s);

5. Proceed to the next task in the Corrective Action Program; and/or

6. Submit an application for a new compliance plan to implement corrective measures.

   Any additional requirements must be completed within the time frame(s) specified by the executive director.

C. Units Requiring Investigation (Reserved)

D. Variance from Investigation

The permittee may elect to certify that no hazardous waste or hazardous constituents listed in 40 CFR Part 261, Appendix VIII and/or 40 CFR Part 264, Appendix IX are or were present/managed in a unit listed in Section IX.C. in lieu of performing the investigation required in Sections IX.B. and E., provided that confirmation data is submitted for the current and past waste(s) managed in the respective unit. The permittee shall submit such information and certification(s) on a unit-by-unit basis in the time frame required in Section IX.E. for review and approval by the executive director of the TCEQ. If the permittee cannot demonstrate and certify that hazardous waste or hazardous constituents are not or were not present in a particular unit, the investigation required in Sections IX.B. and shall be performed for the unit and/or AOC.

E. RCRA Facility Investigation (RFI)/Affected assessment (APA)

Within sixty (60) days from the date of issuance of this permit the permittee shall submit a schedule for completion of the RFI(s)/APA for the SWMU(s) or AOC listed in Section IX.C. to the executive director for approval. Also, within sixty (60) days of approval of an RFA Report which recommends further investigation of a SWMU(s) or AOC in accordance with Section IX.A., the permittee shall submit a schedule for completion of the RFI(s)/APA to the executive director for approval. The permittee shall initiate the investigations in accordance with the approved schedule and guidance contained in the EPA publication EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994 and in accordance with state regulations referenced in Section IX.B. If the permittee elects to use an alternate investigation approach, executive director approval of the workplan will be required prior to initiation of investigation(s). The results of the RFI/APA must be appropriately documented in a report and submitted to the executive director for approval within the time frame established in the approved schedule. The Report shall be considered complete when the full nature and extent of the contamination, the QA/QC procedures and the Data Quality Objectives are documented to the satisfaction of the executive director. The permittee shall propose or conduct Interim Corrective Measures (ICMs), as necessary, to protect human health and the environment.

F. Remedy Selection

Upon approval of the RFI Report/APA Report (APAR), if it is determined that there has been a release of COCs into the environment, which poses a potential risk to human health and the environment, then the permittee shall propose a remedy in accordance with the 30 TAC Chapter 335, Subchapters A and S, Risk Reduction Standards (if applicable), the TRRP rules, or as otherwise authorized by the executive director. This may require a BLRA and/or CMS Report to be submitted for review and approval within the time frame(s) specified by the executive director. For facilities that are grandfathered under 30 TAC Chapter 335, Subchapter S, this report shall address RRS requirements, and the applicable items contained in the EPA publications referenced in Section IX.E. or other guidance acceptable to the executive director. For projects conducted under TRRP, the risk assessment process shall be addressed in the APAR and the evaluation of corrective measures shall be conducted as part of the remedy standard selection process.

1. Corrective Measures Implementation (CMI)/Remedial Action Plan (RAP). The permittee shall submit a RAP within the time frame required by the executive

director, not to exceed 180 days from the date of approval of the APAR. The RAP shall address all of the items for Corrective Measures Implementation (CMI) Workplans contained in the U.S. EPA publication EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994. If the RAP does not propose a permanent remedy, then a RAP shall be submitted as part of a new Compliance Plan application or as a modification/amendment application to an existing compliance plan. The RAP shall contain detailed final engineering design and monitoring plans and schedules necessary to implement the selected remedy. Implementation of the corrective measures shall be addressed through a new and/or a modified/amended Compliance Plan. Upon installation of a corrective action system based upon the approved RAP, the permittee shall submit a RACR. Approval of the RACR places the SWMU in a status of conditional No Further Action, reflecting that the remedy is in place, controls must be maintained, and effectiveness must be monitored. To report the progress of the corrective measures, the permittee shall submit the Post-Response Action Care Report (PRACR) to the TCEQ in accordance with the schedule specified in the Compliance Plan to show the progress of actions taken.

If on the basis of the RFI and/or BLRA and/or CMS or APA, it is determined that there is a risk to human health and/or the environment, then the permittee shall submit for approval a CMI Work Plan(s) or propose a response action (TRRP) within 180 days of receipt of approval of the RFI and/or BLRA/CMS Report or APAR unless otherwise extended by the executive director. The CMI Workplan shall address all of the applicable items contained in the EPA publications referenced in Section IX.B. or other guidance acceptable to the executive director. Response actions, including TRRP Remedy Standard A or Risk Reduction Standard (RRS) No. 2, cannot be self-implemented as normally allowed by TRRP or RRS because under HSWA corrective action requires the CMI workplan to be reviewed prior to approval and public participation (see also Provision IX.F.2). For TRRP response actions, the permittee shall submit a RAP in accordance with schedules and requirements of 30 TAC Chapter 350. The CMI Workplan or RAP shall contain detailed final proposed engineering design, monitoring plans and schedule to implement the selected remedy and assurances of financial responsibility for completing the corrective action. Upon completion of the response action, the permittee shall submit a CMI Report or RACR to the TCEQ for review and approval. The CMI Report shall address all the applicable items in the EPA publications EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994 or other guidance acceptable to the executive director. The RACR shall address all the applicable items in Title 30 TAC Chapter 350 and applicable guidance.

If the response action does not propose a permanent remedy (e.g., RRS No. 3 or Remedy Standard B), or the response action requires long-term groundwater monitoring in order to demonstrate attainment of a permanent remedy (e.g., monitored natural attenuation to demonstrate Remedy Standard A), the permittee must submit a CMI Workplan or RAP as part of a Compliance Plan application to establish corrective action and provide financial assurance to satisfy the requirements of 30 TAC Section 335.167. The Compliance Plan application must be submitted within 180 days of approval of the CMS/BLRA or APAR. The permittee may propose an alternative schedule to be approved by the executive director to incorporate several approved CMI Workplans or RAPs into a single Compliance Plan application when CMI Workplans or RAP schedules coincide. Implementation of the corrective measure(s) shall be addressed through issuance of a new Compliance Plan.

To report the progress of the corrective measures, the permittee shall submit to the TCEQ CMI Progress Reports or RAERs (TRRP) on a semi-annual basis, or schedule approved by the executive director in the CMI Workplan or RAP. For waste and contaminated media approved to remain in place above background or health-based concentration levels after completion of the corrective action program, the permittee shall record an instrument in the county deed records for the facility to specifically identify the areas of contamination exceeding background or health-based values. The deed certification shall follow the requirements of 30 TAC Sections 335.560 and 335.569 or 30 TAC Section 350.111, where applicable. The permittee shall within ninety (90) days of approval for the final corrective action submit to the executive director for review and approval the required proof of deed notice.

2. Public Notice

a. The permittee shall conduct public notice when:

(1) CMI Work Plan or RAP is submitted to the executive director, in accordance with Provision IX.F.1., which contains the proposed final corrective measure for SWMU(s) and/or AOC(s) from which a release has occurred, and with proposed institutional control (as applicable). This process occurs through the submittal of an application for a new Compliance Plan; or

(2) If on the basis of the RFI/BLRA or APAR required by Sections IX.E. and IX.F., it is determined the release from SWMU(s) and/or AOC(s) meets the performance standards under RRR or TRRP such that no remedy is needed, there is no risk to the human health and/or the environment, and the permittee seeks approval of no further action determination by the executive director. This process occurs through the corrective action process.

b. No public notice is required when it is determined based on the results of the RFA required by Section IX.A., or the RFI or APAR required by Section IX.E., that no release occurred from a SWMU and/or AOC. The purpose of the public notice is to give the members of the public the opportunity to submit written comments on the proposed corrective measure(s) or proposed no further action determination.

G. Compliance Plan (Reserved)

X. Air Emission Standards

A. General Conditions

1. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in Section 382.003 of the Texas Health and Safety Code Ann. or violate Section 382.085 of the Texas Health and Safety Code Ann. If the executive director of the TCEQ determines that such a condition or violation occurs, the permittee shall implement additional abatement measures as necessary to control or prevent the condition or violation.

2. The permittee shall include in the Biennial Report, required in Provision II.B.7., a statement that hazardous waste management units or associated ancillary equipment

at this facility are not subject to any of the requirements in Section X.B.5 and X.B.6, if these requirements are not applicable to any hazardous waste management units or associated ancillary equipment at this facility. If at any time any hazardous waste management units or associated ancillary equipment become subject to the requirements in Section X.B.5 and X.B.6, the permittee must immediately comply with these requirements.

3. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in that table. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on Attachment E - Emission Sources—Maximum Allowable Emission Rates. [30 TAC 116.115(b)(2)(F)].

4. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the MAERT. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions.

5. Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)].

6. The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)].

7. The appropriate regional office of the TCEQ and Harris County Pollution Control Department (HCPCD) shall be notified prior to the start of any governmentally required air monitoring of the facility units authorized by this permit in such a manner that a representative of the TCEQ and HCPCD may be present during monitoring.

8. The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit;

and retain information in the file for at least five years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)].

9. Permittee shall maintain a duplicate record of a current inventory of materials regulated under this permit at an offsite location.

B. Federal Applicability

10. Process Vents: The permittee must comply with the requirements of 30 TAC Section 335.152(a) (17)/40 CFR Part 264 Subpart AA, as applicable.

11. Equipment Leaks: The permittee must comply with the requirements of 30 TAC Section 335.152(a) (18)/40 CFR Part 264, Subpart BB, as applicable.

12. Tanks, Surface Impoundments, and Containers: The permittee must comply with the requirements of 40 CFR Part 264 Subpart CC, as applicable.

C. Process Vents, Containers, and Tanks

13. Containers of hazardous waste shall be opened only for the purposes authorized by the terms and conditions of this permit.

14. Except for labels, logos, etc. not to exceed 15 percent of the tank total surface area, uninsulated tank exterior surfaces exposed to the sun shall be white or unpainted aluminum. Storage tanks must utilize submerged fill pipes.

15. Capacity and type of wastes stored in the containers and tanks is limited to the representation as listed in Attachment D, Table V.B Container Storage Area and Table V.C Tanks and Tank System of the Permit Renewal application dated March 04, 2023. Sample calculations that were used to determine the MAERT limits in the permit renewal application Industrial Hazardous Waste (IHW) One Stop Permit Renewal application dated March 04, 2023, shall be attached to a copy of this permit at the plant site.

D. Carbon Adsorption System (CAS)

16. Process tanks PT-2 and PT-11 shall vent through a carbon adsorption system designated as Carbon Adsorber 010211 (EPN: CAR010211). The lab pack fume hoods (FIN: CS-1) shall vent through a carbon adsorption system designated as Carbon Adsorber 30 (EPN: CAR30). The lab pack fume hoods (FIN: CS-3) shall vent through a carbon adsorption system designated as Carbon Adsorber 30 (EPN: CAR-30). The following FINs: Process tanks PT-2 and PT-11, and the lab pack fume hoods shall vent through a carbon adsorption system (CAS EPN: CAR010211, and CAR30 respectively).

A. The carbon adsorbers shall be sampled once each calendar week when they are in use. The sampling point shall be in the stack after passing through the carbon. Sampling shall be performed with the blower on and when:

(a) Organic liquids are being transferred in the fume hoods connected to two carbon beds in parallel EPN: CAR 30.

(b) Waste is present in Tank FIN: PT-2 and/or FIN: PT-11 connected to EPN: CAR010211.

B. The VOC sampling and analysis shall be performed using an instrument with a flame ionization detector (FID), photo ionization detector (PID) or a TCEQ-approved alternative detector. The instrument/FID or PID must meet all requirements specified in Section 8.1 of EPA Method 21 (40 CFR 60, Appendix A). Sampling and analysis for VOC breakthrough shall be performed as follows:

(a) Immediately prior to performing sampling, the instrument/FID shall be calibrated with zero and span calibration gas mixtures. Zero gas shall be certified to contain less than 0.1 ppmv total hydrocarbons. Span calibration gas shall be methane at a concentration within ± 10 percent of 100 ppmv and certified by the manufacturer to be ± 2 percent accurate. Calibration error for the zero and span calibration gas checks must be less than ± 5 percent of the span calibration gas value before sampling may be conducted.

(b) The sampling point shall be in the exhaust stack near the outlet of the carbon adsorber. Sample ports or connections must be designed such that air leakage into the sample port does not occur during sampling.

(c) During sampling, data recording shall not begin until after two times the instrument response time. The VOC concentration shall be monitored for at least 5 minutes, recording 1-minute averages, while the control device is in use as defined in X.D.16.A.

C. Breakthrough shall be defined as the highest 1-minute average measured VOC concentration at or exceeding 100 ppmv. When the condition of breakthrough of VOC from the carbon adsorber occurs (1) Cease operations (i.e., no further transfer of waste between containers or no further additions to tanks PT-2 or PT-11), (2) Turn off the blower drawing air into the carbon canister, (3) Replace spent carbon with new carbon. Operations that vent organic air contaminants to the carbon adsorber may not be resumed until the carbon has been replaced. Sufficient new activated carbon shall be maintained at the site to replace spent carbon.

D. Records of the CAS monitoring maintained at the plant site, shall include (but are not limited to) the following:

A. Sample time and date.

B. Monitoring results (ppmv).

C. Corrective action taken including the time and date of that action.

D. Process operations occurring at the time of sampling.

E. Alternate monitoring or sampling requirements that are equivalent or better may be approved by the TCEQ Regional Manager. Alternate requirements must be approved in writing before they can be used for compliance purposes.

E. Scrubbers: FIN: SCR010211, EPN: SCR 36 and EPN: SCR 30, EPN: SCR 36 / SPCAU36, EPN: SCR12 and FIN: WPS12

17. Scrubber (FIN: SCR010211, EPNs: SCR 36 and SCR 30, SCR12 and FIN: WPS12) shall operate with no less than the efficiencies and maximum outlet (ppmv) as listed for contaminants identified in Attachment A on an hourly average.

18. The minimum liquid flow to the scrubber's shall be as listed in the Table I. below. For Scrubber EPNs EPN: SCR010211, SCR 30, SCR36 and EPN: SCR12, the minimum liquid

flow to the absorber shall be as listed in the Table I. below. The circulation rate shall be monitored and recorded as specified in Table I.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

Quality assured (or valid) data must be generated when the (facility generating emissions as specified in X.D.16.A) is operating except during the performance of a daily zero check. Loss of valid data due to periods of monitor breakdown, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the (facility generating emissions as specified in X.D.16.A) operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

19. The scrubbing solution shall be maintained at or above a pH of 10 as listed in the Table I. below, when the scrubbers is charged with a basic material to control emissions. For Scrubber EPNs SCR010211, SCR30, SCR 36 and SCR12, the scrubbing solution shall be maintained at or above a pH of 10 when the scrubbers are charged with a basic material to control emissions. The pH shall be continuously analyzed and recorded at the frequency specified in Table 1. below. Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within ± 0.5 pH unit.

Quality assured (or valid) data must be generated when the (facility generating emissions as specified in X.D.16.A) is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the (facility generating emissions as specified in X.D.16.A) operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

XI. Compliance Plan (Reserved)

Table III.D. – Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
TANKS		
Valves in Gas/Vapor or Light Liquid Service	Leaks [40 CFR §264.1063(b) & Method 21 Leak Detection]	Monthly[1]
Valves	Leaks/Corrosion	Each Workday
Other Tank Connectors (e.g., Flanges, Plugs, Pressure Release Device, Agitator, Conservation Vent, Sample/Gauge Hatch, Man-way)	Leaks [Visual or Olfactory Evidence]	Each Work Day[2]
Open Ended Lines	Cap Missing	Each Workday
Tank Level	Overfilling	Each Workday
Tank Shell	Leaks/Corrosion	Each Workday
Temperature	Improper operation	Each Workday
Temperature Probe	Improper calibration	Annually
pH Probe	Improper calibration	Annually
Detailed Integrity Testing	Loss of tank integrity	Every 3 Years
Secondary Containment Vault and Lining	Loss of Containment Integrity (e.g., Cracks, Erosion, Damaged sealant, Leaks)	Each Workday
PUMPS IN LIGHT LIQUID SERVICE	Pump Seal Leaks [Visual Evidence]	Weekly
	Pump Seal Leaks [40 CFR §264.1063(b) & Method 21]	Monthly
CONTAINER STORAGE, LOADING AND UNLOADING AREAS		
Containers Covers and Closure Devices	Cracks, Holes, Gaps or Other Open Spaces	When Received[3]
Containers	Leaks	Weekly
	Corrosion	Weekly
	Sever dents that could predispose the drum to leak.	Weekly
	Unsecured closures	Weekly
	Cylinders unsecured	Weekly
	Unstable stacking	Weekly
	Inadequate aisle space between double rows of drums (30" Min)	Weekly
Concrete Slab of Storage Areas	Cracks	Weekly

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
Containment Curbs of Storage Areas	Cracks	Weekly
Roof Drains	Holes causing rain to enter storage area	Weekly
FIRE SUPPRESSION SYSTEMS		
Pull Stations (9)	Physical Damage	Weekly
Strobes/Bells/Horns	Physical Damage	Weekly
Supply Water Level	Inadequate Supply (system not charging)	Weekly
Emergency Exits	Obstructions/Closed/Operability	Weekly
Dry Chemical Cylinder Charge	Not Fully Charged	Weekly
Automatic Overhead Doors	Inoperable	Annually
Dry Chemical System	Detailed Integrity Testing	Annually
High Expansion Foam System	Detailed Integrity Testing	Annually
PORTABLE FIRE EXTINGUISHERS		
Gauge	Charge (In Green Operating Range)	Weekly
Complete Unit	Detailed Integrity Testing	Annually
EMERGENCY COMMUNICATION SYSTEM	Operability	Weekly
SPILL CONTROL EQUIPMENT	Inadequate Inventory or Condition	Monthly
SAFETY EQUIPMENT	Inadequate Inventory and Condition	Weekly
FIRST AID KIT	Inadequate Inventory	Weekly
SAFETY SHOWER/EYE WASH	Inoperable	Monthly
DECONTAMINATION CHEMICALS	Inadequate Inventory	Monthly
GATES AND FENCES		
Fence	Holes	Monthly
Signs	Missing or Not Legible	Monthly
AIR EMISSIONS SYSTEMS		
Activated Carbon	Breakthrough (100 ppm Total Organics)	Weekly
Caustic Scrubbers		
(SCR 30 – Lab Pack)	Alkalinity[4]	Daily - Monthly
(SCR 36 – QC)	pH[5] Range: <4 or > 10	Hourly - Daily

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
(SCR 12 - Scrubber to PT-12)	Flow Rate[6]	Daily at start-up
(SCR 010211 – PT-2, PT-11)	Oxidation Potential[7]	Daily at start-up

FOOTNOTES

1. Any valve for which a leak is not detected for two successive months may be monitored the first month of every succeeding quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for two successive months.
2. If evidence of a potential leak (found by visual, audible, olfactory or other means) is found, flanges and other connectors will be monitored with 5 days in accordance with Method 21.
3. Container covers and their closure devices will be visually inspected when received and if a container remains at the facility beyond one year (i.e., in the case of reusable containers) this inspection will be conducted annually.
4. Alkalinity will be tested daily at start-up for all caustic scrubber except SCR 30 which will be monitored monthly to estimate time the scrubbing solution will remain above pH 10.
5. At start up pH will be monitored for all caustic scrubbers. Hourly pH measurements will be taken for SCR 010211 (Chemical Treatment System Scrubber) while material is being added to a tank system connected to the scrubber. If the scrubber is charged with a basic material, the pH of the scrubbing material must be maintained above 10. If the scrubber is charged with an acid (e.g., appropriate when neutralizing Ammonia), the pH must be maintained below 4.0.
6. Flow rate is based on a pressure gauge reading on the discharge of the spray pump or a calibrated unit designed to read in gallons per minute (e.g., in-line turbine flow meters).
7. If the scrubber is charged with a reducing agent (e.g., Sodium bisulfite) or oxidizing agent (e.g., Sodium hypochlorite, Potassium permanganate), Oxidation Reduction Potential (ORP) in millivolts will be used to determine when the scrubbing solution reaches 1% concentration and requires recharging. ORP will be tested at start-up prior to treating oxidizing or reducing compounds in the system.

Table IV.B. – Wastes Managed In Permitted Units

No.	*Waste*	*EPA Waste Codes*	*TCEQ Waste Codes (Form Code for Off-site Waste)*	*TCEQ Waste Classifications (H, 1, 2, 3[1])*
On-Site and Off-site Waste				
1.	Oxidizers, solid, liquid and sludges	D001, D002, D004-D011, D018-D043, Applicable P & U Codes	101, 102, 103, 104, 105, 113, 114, 119, 319,	H
2.	Corrosive wastes	D002, D004-D011, D018-D043, K062 Applicable P & U Codes	103, 104, 105, 106, 109, 110, 113, 114, 115, 119, 219, 309, 501, 502, 505, 506, 507, 508, 511,	H
3.	Metallic salts, solids solutions and sludges	D004-D011, D018-D043, F006, F012,F019, K062, Applicable P & U Codes	101, 102, 103, 105, 106, 107, 113, 114, 115, 119, 198, 302, 303, 304, 305, 306, 307, 309, 310, 312, 316, 502, 505, 506, 507, 508, 510, 511, 514,	H, 1
4.	Ignitable liquids, solvents, and other organic liquids	D001, D002, D004-D011, D018-D043, F001-F005, K048-K052, K086 Applicable P & U Codes	201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 219, 296, 299,	H, 1
5.	Ignitable and other solids and sludges	D001,D002,D004-D011,D018-D043, K048-K052, K086, F001-F005, F037, F038, Applicable P & U Codes	301, 307, 403, 404, 406, 407, 409, 488, 489, 490, 493, 503, 601, 602, 603, 604, 605, 606, 609, 695, 696,	H, 1,
6.	Reactive solids, liquids, and sludges	D001, D002, D003, D004-D011, D018-D043, F007-F011, Applicable P & U Codes	107, 108, 111, 112, 302, 307, 309, 310, 312, 313, 314, 315, 393, 405, 493, 506, 507, 508, 509, 597, 605, 609, 697,	H
7.	Non-reactive Cyanides and Sulfides	D002, D004-D011, Applicable P & U Codes	107, 108, 302, 312, 506, 507, 508,	H
8.	Metallic Mercury	D009, U151	117,	H
9.	Compressed Gases	D001, D002, D003, D004-D011, D012-D016, D018-D043, Applicable P & U Codes	701, 801,	H, 1
10.	Pesticides	D001, D002, D004-D011, D012-D016, D018-D043, Applicable P & U Codes	119, 201, 202, 203, 204, 205, 207, 319, 401, 402, 601, 602, 609,	H, 1

No.	*Waste*	*EPA Waste Codes*	*TCEQ Waste Codes (Form Code for Off-site Waste)*	*TCEQ Waste Classifications (H, 1, 2, 3[1])*
11.	Polychlorinated Biphenyls	N/A	297, 298, 394, 395, 397, 398, 399, 494, 495, 496, 497, 498, 499, 598, 599, 698, 699,	1
12.	Lab Packs	D001, D002, D003, D004-D016, D018-D043, F001-F005, Applicable P & U Codes	001, 002, 003, 004, 009,	H, 1
13.	Wastewater	D001, D002, D004-D011, D012-D016, D018-D043, Applicable P & U Codes	101, 102, 113, 114, 115, 119, 199, 299,	H, 1
14.	Inorganic solids and sludges	D004-D011, D012-D016, D018-D043 Applicable P & U Codes	301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 319, 388, 389, 390, 391, 392, 393, 501, 502, 503, 505, 504, 506, 507, 508, 510, 511, 514, 515, 516, 519, 597,	H, 1, 2
Waste Generated On-Site from the Management of Commercial Off-Site Waste (Off-site Waste)				
15	Empty containers (For Disposal)	None	308	1
16	Aerosol Cans	D001, D004-D016, D018-D043, Applicable P and U Codes	801	H
17	Emissions control waste (Spent Caustic)	D002, D004-D016, D018-D043, P and U-Codes	115	H
18	Emissions Control Waste (Spent Carbon)	D004-D016, D018-D043, P and U-Codes	404	H
19	Absorbents from spill clean-up	D004-D016, D018-D043, F001-F007 Applicable P and U Codes	310	H
20	PPE (Contaminated)	D004-D043, F001-F007, P and U-Codes	409	H
21	Filtered or Precipitated Solids	D004-D016, D018-D043, F001-F005, P & U Codes	316	H
22	Empty Containers (Metal)	None	308	2

No.	*Waste*	*EPA Waste Codes*	*TCEQ Waste Codes (Form Code for Off-site Waste)*	*TCEQ Waste Classifications (H, 1, 2, 3[1])*
23	Empty Containers (Plastic)	None	407	2
24	Rinse water (Cleaning Drums with Inorganics)	D002, D004-D011, P & U Codes	114	H
25	Rinse Water (Cleaning Drums with Organics)	D001, D004-D043, F001-F005, P & U-Codes	102	H
26	Rainwater	None	114	1
27	Laboratory Waste Liquids	D001, D002, D004-D016, D018-D043, F001-F005	110, 204	H
28	PPE (Uncontaminated)	None	409	1
29	Rinse Water (Cleaning Non-Hazardous Drums)	None	114	1
30	Laboratory Waste Solids	None	319	1
31	Chemical Treatment Process Water	D001, D002, D004-D016, D018-D043 Applicable P and U-codes	113	H
32	Broken Pallets	None	488	1
33	Rinse Water (Routine Housekeeping)	None	114	1
34	Rinse Water (Power washing contaminated floors)	D001-D043	102	H
35	Vermiculite	None	192	1
36	Silica	None	319	1
37	Used Oil Filters	None	489	1
38	Treatment Solids	D001, D003, D004 –D043, Applicable P and U-Codes	310	H
39	Sandblast waste from scouring concrete and other surfaces.	D004-D011, D018-D043, F001-F005 Applicable P and U-listed waste.	319	H

Table IV.C. – Sampling and Analytical Methods

Waste No[1]	*Sampling Location*	*Sampling Method*	*Frequency*	*Parameter*	*Test Method (or equivalent)*	*Desired Accuracy Level*
1.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D 4979-95	N/A ± Result
				Cyanide[5]	ASTM D4282-95	N/A ± Result
				Sulfide[5]	ASTM D 4978-89	N/A ± Result
				pH	SW-846 9041A	1
					SW-846 9040B	0.1
				Specific Gravity or Bulk Density	ASTM D 1298-99	0.1
				VO Content[8]	40 CFR 60 - 25D[10]	1 ppm
				Vapor Pressure[9]	ASTM D5191[10]	± 76.6 kPa
2.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D 4979-95	N/A Observation
				Flash Point or	SW-846 1020A	5°F
				Flammability Potential[2]	ASTM D 4982-95	N/A ± Result
				Oxidizer Screen	ASTM D 4981-95	N/A ± Result
				Cyanide[5]	ASTM D4282-95	N/A ± Result
				Sulfide[5]	ASTM D 4978-95	N/A ± Result
				pH	SW-846 9041A	1
					SW-846 9040B	0.1
				Specific Gravity or Bulk Density	ASTM D1298-99	0.1
				VO Content[8]	40 CFR 60 - 25D[10]	1 ppm
				Organic Vapor Pressure[9]	ASTM D5191[10]	± 76.6 kPa
3.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				Flash Point or	SW-846 1020A	5°F
				Flammability Potential[2]	ASTM D4982-95	N/A ± Result
				Oxidizer Screen	ASTM D 4981-95	N/A ± Result
				Cyanide	ASTM D4282-95	N/A ± Result
				Sulfide	ASTM D4978-95	N/A ± Result
				pH	SW-846 9041A	1
					SW-846 9040B	0.1
				Specific Gravity or Bulk Density	ASTM D1298-99	0.1
				Presence of Liquids[12]	SW-846 9095	N/A ± Result

Waste No[1]	Sampling Location	Sampling Method	Frequency	Parameter	Test Method (or equivalent)	Desired Accuracy Level
				VO Content[8]	40 CFR 60-25D[10]	1 ppm
				Vapor Pressure[9]	ASTM D5191[10]	± 76.6 kPa
4.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				Flash Point or	SW-846 1020A	5°F
				Flammability Potential	ASTM D 4982-95	N/A ± Result
				BTU Content[7]	ASTM D5468-95	500 BTU/lb
				Chloride and/or	SW-846 9253[10] or 9212[10]	0.1%
				Fluoride	SW-846 9214	0.1%
				Water Content	ASTM E 203-96	1%
				pH	SW-846 9041A	1
					SW-846 9040B	0.1
				Specific Gravity or Bulk Density	ASTM D 1298-99	0.1
				Vapor Pressure[9]	ASTM D5191[10]	± 76.6 kPa
5.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				Flash Point or	SW-846 1020A	5°F
				Flammability Potential	ASTM D4982-95	N/A ± Result
				BTU Content[7]	ASTM D5468-95	1
				Chloride and/or	SW-846 9253[10] or 9212[10]	0.1%
				Fluoride	SW-846 9214	0.1%
				Specific Gravity	ASTM D1298-99	0.1
6.[6]	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				Cyanide	ASTM D4282-95	N/A ± Result
				Sulfide	ASTM D4978-95	N/A ± Result
				pH	SW-846 9041A	1
					SW-846 9040B	0.1
				Specific Gravity or Bulk Density	ASTM D1298-99	0.1
				VO Content[8]	40 CFR 60-25D[10]	1 ppm
				Vapor Pressure[9]	ASTM D5191[10]	± 76.6 kPa
7.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				Cyanide	ASTM D4282-95	N/A ± Result
				Sulfide	ASTM D4978-95	N/A ± Result
				pH	SW-846 9041A	1
					SW-846 9040B	0.1

Waste No[1]	Sampling Location	Sampling Method	Frequency	Parameter	Test Method (or equivalent)	Desired Accuracy Level
				Specific Gravity or Bulk Density	ASTM D1298-85	0.1
				VO Content[8]	40 CFR 60-25D[10]	1 ppm
				Vapor Pressure[9]	ASTM D5191[10]	± 76.6 kPa
8.	Container Receiving Area	SW-846 or equivalent	No sample will be taken. However, contents of containers will be visually inspected and documented visually inspected upon receipt.	Physical Description	ASTM D4979-95	N/A Observation
9.	Not applicable. Due to the physical state of this material and inherent hazards in sampling and analysis, this material will not be sampled.					
10.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				pH	SW-846 9041A	1
					SW-846 9040B	0.1
				Flashpoint	SW-846 1020A	5°F
				Specific gravity	ASTM D1298-99	0.1
11.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				Flash Point	SW-846 1020A	5°F
				PCB Content	SW-846 8082	1 ppm
12.	Not applicable. Due to the physical configuration of this waste, sampling and analysis is not practical.					
13.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				Flash Point or	SW-846 1020A	5°F
				Flammability Potential	ASTM D4982-95	N/A ± Result
				Oxidizer Screen	ASTM D4981-95	N/A ± Result
				Cyanide	ASTM D4282-95	N/A ± Result

Waste No[1]	Sampling Location	Sampling Method	Frequency	Parameter	Test Method (or equivalent)	Desired Accuracy Level
				Sulfide	ASTM D4978-95	N/A ± Result
				pH	SW-846 9041A	1
					SW-846 9040B	0.1
				Specific Gravity or Bulk Density	ASTM D1298-99	0.1
				VO Content[8]	40 CFR 60-25D[10]	1 ppm
				Vapor Pressure[9]	ASTM D5191[10]	± 76.6 kPa
14.	Container Receiving Area	SW-846 or equivalent	Individual samples will be taken for each waste stream in each shipment within 24 hours of unloading containers and prior to placement in tanks.	Physical Description	ASTM D4979-95	N/A Observation
				Oxidizer Screen	ASTM D4981-95	N/A ± Result
				Cyanide	ASTM D4282-95	N/A ± Result
				Sulfide	ASTM D4978-95	N/A ± Result
				pH	SW-846 9041A	1
					SW-846 9040B	0.1
				Specific Gravity or Bulk Density	ASTM D1298-85	0.1
15,22,23	Not applicable, empty containers will not be sampled and analyzed.					
16	Not applicable, aerosol cans will not be sampled and analyzed.					
17.	Scrubber or Containers	SW-846 or equivalent	Sampling and analysis will be conducted annually unless the waste is assumed to exhibit all hazardous characteristics applicable to waste being treated under the control of the air emissions system.	TC Metals	SW-846 1311, 6010/7470	1 - 0.001
				pH	SW-846 9040B	0.1
				Flash Point	SW-846 1020A	5°F
18.	Carbon beds or Containers	SW-846 or equivalent	Sampling and analysis will be conducted annually (or when generated) unless the waste is assumed to exhibit all hazardous	Toxicity Characteristics	SW-846 1311, 6010/7470	1 - 0.001

Waste No[1]	*Sampling Location*	*Sampling Method*	*Frequency*	*Parameter*	*Test Method (or equivalent)*	*Desired Accuracy Level*
			characteristics applicable to waste being treated under the control of the air emissions system.			
19. Waste classification will be based on the derived from rule, absorbents will retain the same EPA waste codes as the spilled material.						
20,28	Containers in storage areas CS-1, CS-2, CS-3, CS-4, CS-6.	SW-846 or equivalent	Sampling and analysis of contaminated PPE will be conducted annually unless the waste is assumed to exhibit all toxicity characteristics reasonably expected to be present in the waste.	Toxicity Characteristics	SW 846 1311, 6010, 7470, 8081, 8151, 8260, 8270	1 - 0.001
21.	Containers	SW-846 or equivalent	If the treated waste originally exhibited a hazardous characteristic or contained cyanides, sulfides or underlying hazardous constituents; sampling and analysis will be conducted with each batch to verify the waste meets the treatment standards or the waste will be assumed to exhibit the same hazards or constituents present in the waste prior to treatment.	Toxicity Characteristic	SW 846 1311, 6010,7470, 8081,8151,8260,8270	1 - 0.001 ppm
				Presence of liquids	SW-846 9050	N/A ± Result
				pH	SW-846 9040B	1
				Flash Point[4]	SW-846 1020A	5°F
				Total Cyanide	SW-846 9012[10]	1 ppm
				Amenable Cyanide	EPA 335.1	1 ppm
				Total Sulfide	ASTM D4978-95	N/A ± Result

Waste No[1]	Sampling Location	Sampling Method	Frequency	Parameter	Test Method (or equivalent)	Desired Accuracy Level
24,25,29	Containers in storage areas CS-1	SW-846 or equivalent	Utilizing process knowledge, rinse water will be assumed to exhibit any toxicity characteristic that would have applied to the waste previously held in the container or will be analyzed with each batch for toxicity characteristics and pH (if the waste previously held in the container was corrosive).	Toxicity Characteristics	SW 846 1311, 6010, 7470, 8081, 8151, 8260, 8270	1 - 0.001
				pH	SW-846 9040B	1
26.	Container storage area floors or Containers	SW-846 or equivalent	Annually	pH	SW-846 9040B	0.1
				Flash Point	SW-846 1020A	5°F
				Toxicity Characteristics	SW 846 1311, 6010,7470, 8081,8151,8260,8270	1 - 0.001
				Underlying Hazardous Constituents[11]	SW-846 6010, 7470, 8260, 8270, 8081	1 - 0.001
27.	Container and Tanks	SW-846 or equivalent	Sampling and analysis will be conducted annually unless the waste is assumed to exhibit all toxicity characteristics reasonably expected to be present in the waste.	Toxicity Characteristic	SW 846 1311, 6010,7470, 8081,8151,8260,8270	1 - 0.001
				pH	SW-846 9040B	0.1
				Flash Point	SW-846 1020A	5°F
30.	Containers	SW-846 or equivalent	Sampling and analysis will be conducted annually unless the waste is assumed to exhibit all toxicity characteristics reasonably expected to be present in the waste.	Toxicity Characteristic	SW 846 1311, 6010,7470, 8081,8151,8260,8270	1 - 0.001
31.	Tanks PT2, PT-11, WW-2, PT-12	SW-846 or equivalent	If the treated waste originally exhibited a hazardous characteristic or contained cyanides, sulfides or underlying hazardous constituents; sampling and analysis will be conducted with each batch to verify the waste meets the treatment standards or the waste will be assumed to exhibit the same	Flash Point	SW-846 1020A	5°F
				pH	SW-846 9040B	0.1
				Toxicity Characteristics	SW 846 1311, 6010,7470, 8081,8151,8260,8270	1 - 0.001
				Total Cyanide	SW-846 9012[10]	1 ppm

Waste No[1]	Sampling Location	Sampling Method	Frequency	Parameter	Test Method (or equivalent)	Desired Accuracy Level
			hazards or constituents present in the waste prior to treatment.	Amenable Cyanide	EPA 335.1	1 ppm
				Sulfide	ASTM D4978-95	N/A ± Result
				Underlying Hazardous Constituents	SW-846 6010, 7470, 8260, 8270, 8081	1 - 0.001 ppm
Pallets contaminated with waste from a leaking container will be classified in accordance with the derived from rule (i.e., EPA waste codes associated with the spilled material will be applied to the contaminated pallet).						
33.	Containers	SW-846 or equivalent	Annually	pH	SW-846 9040B	0.1
				Toxicity Characteristics	SW 846 1311, 6010, 7470, 8081,8151,8260, 8270	1 - 0.001
34. Rinse water generated during spill clean-up (Waste Number 34) will be classified in accordance with the derived from rule and will retain all hazardous characteristics, listed EPA waste codes and underlying hazardous constituents that applied to the waste prior to being spilled.						
35. Vermiculite is used to cushion containers in a lab pack and absorb liquids if lab pack bottles break. Vermiculite contaminated as a result of a broken container will be classified in accordance with the derived from rule and will retain all hazardous characteristics, listed EPA waste codes and underlying hazardous constituents that applied to the waste in the broken container. Uncontaminated vermiculite is classified as a class 1 non-hazardous waste based on process knowledge (no broken bottles in lab pack) and analysis. A Class 2 determination has also been demonstrated on two occasions through analysis that included all constituents specified in 30 TAC 335 Subchapter R Appendix 1 Table 1						
36. Silica is generated from the treatment of Silane. The waste determination for this material is based on process knowledge in that the byproduct of treating Silane with oxygen in air produces silica. One time analysis has also been conducted to demonstrate the Class 1 non-hazardous waste determination. Future analysis will be conducted if the process changes						
37. Used oil filters removed from company vehicles are classified in accordance with the hazardous waste exclusion in 40 CFR 261.4(b)(13).						
38. An absorbent material such as activated carbon is used to absorb certain compressed gases. The absorbent is classified in accordance with the derived from rule in that any listed EPA waste codes associated with the compressed gas will be assigned to the spent carbon. The spent carbon will also be assumed to exhibit the same characteristics of the compressed gas or will be analyzed for toxicity characteristics with each batch.						
39. Abrasives may be used to clean hard contaminated surfaces. Classification will be based on TCLP analysis for toxic hazardous constituents and from the derived from rule if the cleaning effort is the result of a spill (i.e., the sandblast media will be assigned the same listed codes as the material that spilled).						

FOOTNOTES

[1]Item numbers in this column correspond to the numbers in the first column of Table IV.B.

[2] Sampling and Test/Analysis methods should be specified in enough detail to allow determination of whether they are suitable and correct for the purpose indicated while allowing flexibility in selection and future updates to the specified method. Standard methods, such as those from SW-846, will generally require

no further submittal. Non-standard and proprietary methods may require additional information to determine suitability. ASTM methods may require submittal of a copy of the specified method.

Desired Accuracy Level should provide a specified numeric minimum performance level (maximum acceptable reporting limit) for method detection and quantitation limits that will be accepted from the laboratory performing the analysis and must ensure that reported data will allow determinations of compliance with regulatory limits for the parameter tested.4Flash point or flammability potential analysis is conducted on waste containing liquids only.

Cyanide or sulfide analysis will not be conducted on aqueous waste with a pH ≤ 2.

Analysis identified for Waste number "6" applies to reactive cyanide or reactive sulfide bearing wastes. Fingerprint analysis listed does not apply to other types of reactive waste (e.g., water reactives, air reactives) that cannot be sampled or analyzed due to inherent hazards.

BTU, % Water, TOX, and Chlorine analysis will be conducted on waste intended for fuel blending by SET Environmental.

The Volatile Organic (VO) Content determination (based on knowledge or analysis) will be conducted on hazardous waste intended to be placed in tanks exempt from 40 CFR Subpart CC controls due to their VO content.

Vapor pressure determinations (based on knowledge or analysis) will be conducted on hazardous waste intended to be placed in tanks meeting 40 CFR Subpart CC level 1 controls.

[10]The primary method is indicated; however, an alternate equivalent method may be used.

[11] This analysis is conducted when the waste exhibits a hazardous characteristic subject to 40 CFR §268.48 standards.

[12] If the waste will be placed in a permitted storage area that is not equipped with a secondary containment system.

Table V.B. – Container Storage Areas

Permit Unit No.	Container Storage Area	N.O.R. No.	Waste Nos.[4]	Rated Capacity[3]	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable[1], Reactive[1], or Incompatible[2] waste (state all that apply)
1	CS-1	1	2,3,4,8,9,10,12,13,14,15,16,17, 18,19,20,21,22,23,24,25,26, 27,28,29,30,31,33,36,38	6,600	48' x 100'	14,350	Ignitable, and Reactive Waste*
2	CS-2	3	1,2,3,4,6,7,8,9,10,11,12,13,14,15, 16,17,18,19,20,21,22,23,24,25 26,27,28,29,30,31,33,36,37,38	88,880	44' x 169'	14,540	Ignitable, Reactive and Incompatible Waste
3	CS-3	17	2,3,4,8,9,12,13,14,15,16,17, 18,19,20,21,22,23,24,25, 26,27,28,29,30,31,33,38	11,110	48' x 54'	8,843	
4	CS-4	2	2,3,4,8,9,11,10,12,13,14,15,16,17, 18,19,20,21,22,23,24,25, 26,27,28,29,30,31,33,37,38	48,400	51' x 68.5'	16,749	Ignitable, and Reactive Waste
5	CS-5	15	4,6,9,12,14	880	10.6' x 23.5'	380	Ignitable, Reactive
6	CS-6	16	2,3,4,6,9,10,12,13,14,15,16,17, 18,19,20,21,22,23,24,25, 26,27,28,29,30,31,33,27,38	15,840	36' x 23.5'	2,696	Ignitable, and Reactive Waste

1 Containers managing ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line.
2 Incompatible waste must be separated from other waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments by means of a dike, berm, wall, or other device.
3 Container Storage Areas need to include in capacity calculations any nonhazardous wastes and universal wastes managed in the unit in addition to hazardous wastes.
4 from Table IV.B, first column
* Applies to ignitable and reactive waste treated in tanks.

Table V.C. – Tanks and Tank System

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos.[1]	Rated Capacity	Dimensions (feet)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible Waste (state all that apply)
8	PT-2	20	Storage and Processing	1, 2, 3, 6, 13, 14, 17, 21, 24, 26, 29, 31, 33, 34	1,870	D=6.5', H=8.6'	2,917	Ignitable, Reactive Incompatible
9	PT-11[(2)]	21	Storage and Processing	1, 2, 3, 6, 13, 14, 17, 21, 24, 26, 29, 31, 33, 34	1,500	W=5.7', L=8', H=4.4'	1,615	Ignitable, Reactive Incompatible
14	PT-5	30	Storage and Processing	2, 3,7, 13, 31	7,000	D=9', H=17'	7,135[(3)]	None
15	WW-2	39	Storage	2, 3,7, 13, 31	6,500	D=8.5' H=17.5'	7,135[(3)]	None
16	PT-12[2]	51	Storage and Processing	1, 2, 3, 6,9, 13, 14, 17, 21, 24, 26, 29, 31, 33, 34, 36, 38	1,548	W=6', L=7.7', H=4.5'	2754 W=7.5' x L=9.5' x H=5.2'	Ignitable, Reactive Incompatible

[1] from Table IV.B, first column
[2] PT-11 and PT-12 are rectangular tanks located in an in-ground vault.
[3] Tanks PT-5 and WW-2 are located within a shared concrete containment structure.

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Table VII.E.1. - Permitted Unit Closure Cost Summary

Existing Unit Closure Cost Estimate	
Unit	Cost
TRRP Sampling Analysis and Closure Certifications	$13,389
PT-2 (Permit Unit No. 8)	$4,821
PT-5 (Permit Unit No. 14)	$10,543
PT-11 (Permit Unit No. 9)	$3,733
WW-2 (Permit Unit No. 15)	$9,713
PT-12 (Permit Unit No. 16)	$3,733
CS-1 (Permit Unit No. 1)	$86,983
CS-2 (Permit Unit No. 2)	$471,979
CS-3 (Permit Unit No. 3)	$71,671
CS-4 (Permit Unit No. 4)	$231,341
CS-5 (Permit Unit No. 5)	$103,258
CS-6 (Permit Unit No. 6)	$146,546
Total Existing Unit Closure Cost Estimate (in 2022 Dollars)	$1,157,710

Proposed Unit Closure Cost Estimate	
Unit	Cost
Response: Not Applicable since there are no proposed units as part of this permit renewal application.	$0.00

1 As units are added or deleted from these tables through future permit amendments or modifications, the remaining itemized unit costs should be updated for inflation when re-calculating the revised total cost in current dollars.

Table X.1. - Parameters to be Measured and Maintained for the Scrubbers

Parameter	SCR010211	SCR 36 / SPCAU36	SCR 30	SCR 12	WPS12 – Wet water venturi type particulate scrubber ****
Alkalinity	Daily*	Daily*	Monthly	Daily*	-
pH or ORP*****	Hourly**	Daily*	Daily*	Daily*	-
pH value at or above*****	10	10	10	10	-
Flow Rate***	Daily*	Daily*	Daily*	Daily*	Daily*
Minimum liquid flow rate (gpm)	75	90	90	315	9000 scfm

* During start-up.
** When material is being added to either Tank PT-2 or PT-11.
*** Flow rate is based on a pressure gauge reading on the discharge side of the spray pump or a device (e.g., inline turbine flow meter) that measures flow rate in gallons per minute.
****Particles are removed by the Stage 1 venturi scrubber using recirculating water. The emissions from the treatment unit (FIN PT-12) are emitted through EPN SCR12 which is the exhaust from two scrubbers which are operated in series. The first scrubber is a venturi type particulate scrubber (WPS12) and the second is a packed bed chemical (caustic sodium hydroxide or potassium hydroxide) solution (SCR 12).
*****If the scrubber is charged with a basic material, the pH of the scrubbing material must be as indicated in the table. If the scrubber is charged with an acid (e.g., appropriate when neutralizing Ammonia), the pH must be maintained below 2.0. If the scrubber is charged with a reducing agent (e.g., Sodium metabisulfite) or an oxidizer (e.g., Sodium hypochlorite or Potassium permanganate) the quality control measurement will be oxidation reduction potential (ORP).

Section X - Attachment A – Tables 1- 8

Removal Efficiencies / Maximum outlet concentration (ppmv) and outlet grain loading for the following scrubbers: Caustic Scrubber: EPN: SCR010211, FINs: SCR 36 and SCR 30, SPCAU36 and EPN: SCR12 and FIN: WPS12 – Wet particulate scrubber.

Table 1 - Acid Gases

Compound	Scrubber Removal Efficiency	Max Outlet PPMV (ppmv)
Antimony	99%	10
Boron Tribromide	99%	17
Boron Trichloride	98%	10
Boron Trifluoride	97%	10
Bromine	99%	13
Carbonyl	95%	10
Chlorine	99%	25
Deuterium	99%	50
Deuterium	99%	50
Deuterium	99%	50
Deuterium Iodide	99%	50
Germanium	98%	10
Germanium Tetrafluoride	97%	10
Hydrogen Bromide	99%	50
Hydrogen Chloride	99%	50
Hydrogen Fluoride	99%	50
Hydrogen Iodide	99%	50
Molybdenum Hexafluoride	95%	10
Phosphorus Oxyfluoride	98%	10
Phosphorus Oxytrichloride	98%	10
Phosphorus Pentafluoride	95%	10
Phosphorus Trichloride	95%	10
Phosphorus Trifluoride	90%	10
Phosporus Tribromide	97%	10
Silicon Tetrafluoride	97%	10
Sulfur Bromide Pentafluoride 207.6100 29 > 0.25%	90%	10
Sulfur Choride Pentafluoride 163 100 22 > 0.25%	90%	10
Sulfur Dioxide	99%	25
Sulfuryl Chloride Fluoride	95%	10
Thionyl Bromide	97%	10
Thionyl Fluoride	95%	10
Trifluoromethyltriflate	90%	10
Trimethylborane	90%	10
Tungsten Hexafluoride	90%	10

Section X - Attachment A – Tables 1- 8

Removal Efficiencies / Maximum outlet concentration (ppmv) and outlet grain loading for the following scrubbers: Caustic Scrubber: EPN: SCR010211, FINs: SCR 36 and SCR 30, SPCAU36 and EPN: SCR12 and FIN: WPS12 – Wet particulate scrubber.

Table 2 - Ammonia, Sulfides & Selenides

Compound	Scrubber Removal Efficiency	Max Outlet PPMV (ppmv)
Ammonia	99%	36
Carbonyl Sulfide	80%	10
Deuterium Sulfide	99%	21
Hydrogen Selenide	99%	21
Hydrogen Sulfide	99%	21

Notes: 1. Ammonia cannot be effectively scrubbed out of an air stream using recirculating plain water; rather an acid is required for neutralizing the Ammonia as it absorbs into the recirculating solution. Typical acid of choice for scrubbing Ammonia is Sulfuric Acid.

Table 3 - Organo Silanes

Compound	Scrubber Removal Efficiency	Max Outlet PPMV (ppmv)
Chlorosilane	99%	17
Dichlorosilane	99%	13
Dimethyl Chlorosilane	99%	17
Hexachlorodisilane	98%	10
Hexafluorodisilane	97%	10
Methyl Dichlorosilane	99%	13
Methyl Trichlorosilane	99%	10
Trichlorosilane	99%	10
Trifluorosilane	98%	10

Table 4 - Fluorinated Organic Acids

Compound	Scrubber Removal Efficiency	Max Outlet PPMV (ppmv)
(Fluorosulfonyl) difluoroacetyl fluoride, 2-	98%	10
Heptafluoro butyryl Fluoride	90%	10
Nitrogen Trifluoride	50%	10
Tetraethylortho silicate	98%	10

Section X - Attachment A – Tables 1- 8

Removal Efficiencies / Maximum outlet concentration (ppmv) and outlet grain loading for the following scrubbers: Caustic Scrubber: EPN: SCR010211, FINs: SCR 36 and SCR 30, SPCAU36 and EPN: SCR12 and FIN: WPS12 – Wet particulate scrubber.

Tetrakis (Dimethylamido) Hafnium	99%	<10
Tetrakis (Dimethylamido) Platinum	99%	<10
Tetramethyl disiloxane	90%	10
Trifluoromethane sulfonyl Fluoride	90%	10

Table 5 – NOx

Compound	Scrubber Removal Efficiency	Max Outlet PPMV (ppmv)
Nitric Oxide	50%	10
Nitrogen Dioxide	70%	10
Nitrogen Trioxide	70%	10
Nitrosyl Chloride	98%	10

Table 6 – Hydrides

Compound	Removal efficiency	Max. Outlet gr/DSCF
Arsine - Arsenic Pentoxide	99.6%	0.01
Diborane - Boric Acid	99.6%	0.01
Phosphine - Phosphorous Pentoxide	99.6%	0.01
Diethyl Telluride - Tellurium Dioxide	99.6%	0.01
Germane - Germanium Dioxide	99.6%	0.01
Silane - Silicon Dioxide	99.6%	0.01
Iridium Hexafluoride - Iridium Dioxide	99.6%	0.01
Stannic Chloride - Stannic Dioxide	99.6%	0.01
Titanium Trichloride - Titanium Dioxide	99.6%	0.01
Titanium Tetrachloride - Titanium Dioxide	99.6%	0.008
Vanadium Tetrachloride - Vanadium Pentoxide	99.6%	0.01

Section X - Attachment A – Tables 1- 8

Removal Efficiencies / Maximum outlet concentration (ppmv) and outlet grain loading for the following scrubbers: Caustic Scrubber: EPN: SCR010211, FINs: SCR 36 and SCR 30, SPCAU36 and EPN: SCR12 and FIN: WPS12 – Wet particulate scrubber.

Stannic Chloride - Stannic Dioxide	99.6%	0.01
Titanium Trichloride - Titanium Dioxide	99.6%	0.01

Table 7 - Acutely Toxic Corrosive

Compound	Scrubber Removal Efficiency	Max Outlet PPMV (ppmv)
Arsenic Pentafluoride	97%	10
Arsenic Trifluoride	90%	10
Bromine	98%	10
Carbonyl Fluoride	99%	13
Cyanogen Chloride	90%	10
Germanium Tetrafluoride	97%	10
Hydrogen Cyanide	99%	50
Phosgene	95%	10
Sulfur Tetrafluoride	97%	10
Sulfuryl Chloride	95%	10
Sulfuryl Chloro Fluoride	90%	10
Sulfuryl Fluoride		10

Table 8 - Fluorinated Oxidizers

Compound	Scrubber Removal Efficiency	Max Outlet PPMV (ppmv)
Bromine Chloride	99%	25
Bromine Pentafluoride	98%	10
Bromine Trifluoride	99%	13
Chlorine Monofluoride	99%	25
Chlorine Trifluoride	99%	13
Fluoroxytrifluoro methane	50%	10
Iodine Heptafluoride	50%	10
Iodine Pentafluoride	99%	10
Perchloryl Fluoride	50%	10
Tetrafluoro hydrazine	50%	10

Section X - Attachment A – Tables 1- 8

Removal Efficiencies / Maximum outlet concentration (ppmv) and outlet grain loading for the following scrubbers: Caustic Scrubber: EPN: SCR010211, FINs: SCR 36 and SCR 30, SPCAU36 and EPN: SCR12 and FIN: WPS12 – Wet particulate scrubber.

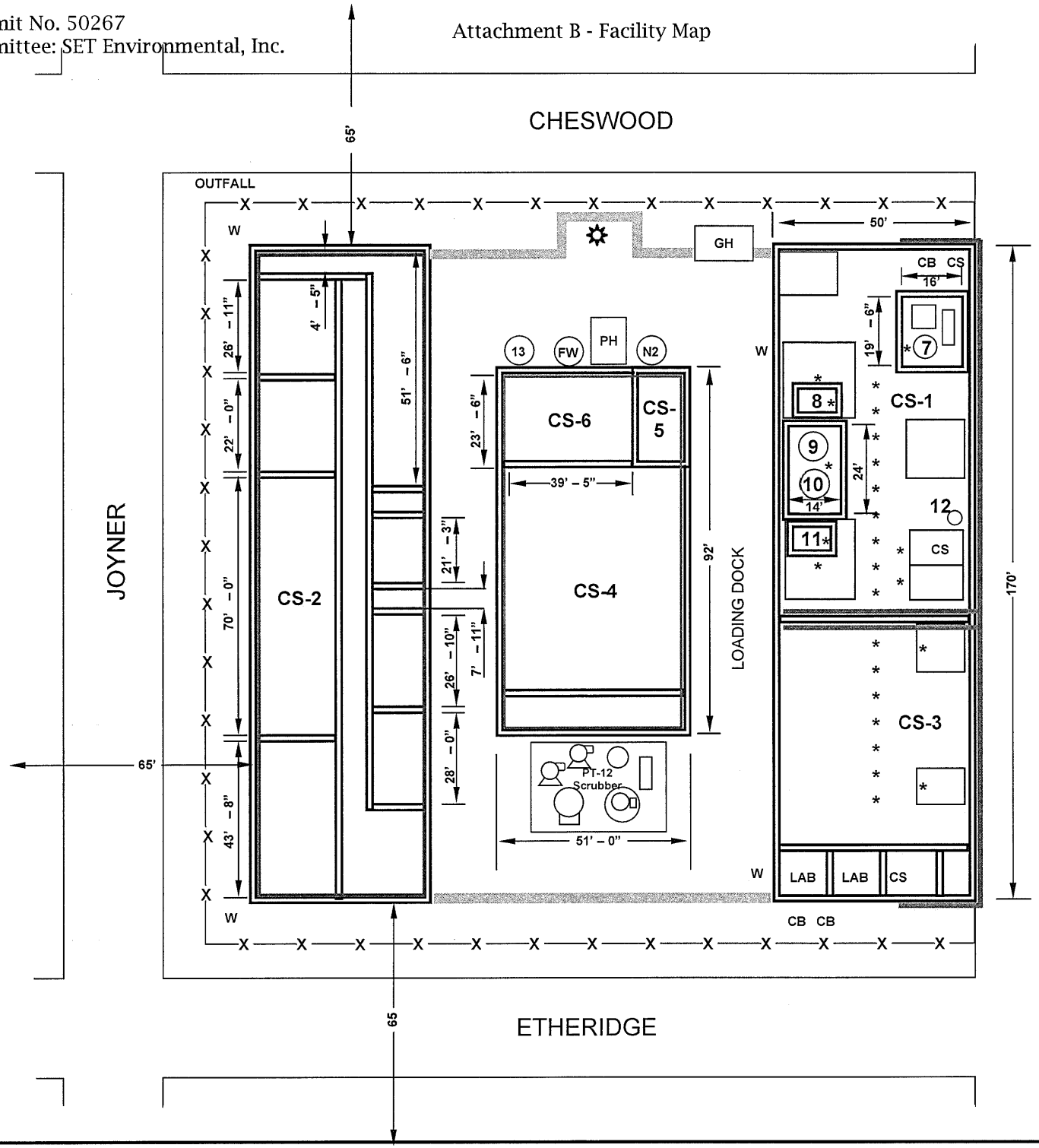
Trifluoromethyl hypofluorite	50%	10
Xenon Difluoride	98%	10
Fluorine	99%	25

Attachment A – Legal Description of Facility

Lots Nine (9), Ten (10), Eleven (11), Twelve (12), Thirteen (13), Fourteen (14), Fifteen (15), Sixteen (16) of Block 38 of Kings Court, an addition in the City of Houston, Harris County, Texas according to the map thereof, recorded on Volume 7, Page 65, of the Map of Records of Harris County, Texas.

Permit No. 50267
Permittee: SET Environmental, Inc.

Attachment B - Facility Map



LEGEND

- Secondary Containment
- X Fence
- * Blind Sump
- W Well
- Concrete Berm
- CB Carbon Bed
- CS Caustic Scrubber
- Sump to Storm Sewer
- PH Pump House
- N2 Nitrogen Tank
- FW Fire Suppression Water Tank
- GH Guard House
- Ignitable Storage Area
- 4 Hour Fire Wall

Item	Name	NOR No.	Permit No.
1	CS-1	1	1
2	CS-2	3	2
3	CS-3	17	3
4	CS-4	2	4
5	CS-5	15	5
6	CS-6	16	6
7	PT-2	20	8
8	PT-11	21	9
9	PT-5	30	14
10	WW-2	39	15
11	PT-12	51	16
12	90 Day Tank	25	NA
13	Stormwater tank	48	NA

N

0 15 30

Scale in Feet

SET Environmental, Inc

FIGURE V-1
Facility Layout Plan
Houston, Texas

Attachment C – Permit Application Revision Chronology

Classification	Revision No.	Application Date	Purpose
Renewal with minor amendments	0	November 8, 2022	Application for renewal of Permit No. 50267 issued on May 10, 2013
Revisions to permit renewal application	1	December 6, 2022	Administrative NOD Responses
Revisions to permit renewal application	2	March 12, 2023 November 16, 2023	Technical NOD Responses (IHW) Technical NOD Responses (Air Permits)

Attachment D - List of Incorporated Application Materials

The following is a list of Part A and Part B Industrial & Hazardous Waste Application elements which are incorporated into all Industrial & Hazardous Waste permits by reference as per Section I.B.

TCEQ Part A Application Form

I. General Information
II. Facility Background Information
III. Wastes and Waste Management
IV. Index of Attachments

TCEQ Part B Application Form

I. General Information

A. General Information
B. TCEQ Core Data Form (Form 10400)
C. Signature Page
D. Interim Status Land Disposal Unit(s) Certification (Reserved)
Table I - General Information
Table I.1 - Description of Proposed Application Changes

II. Facility Siting Criteria

A. Requirements for Storage or Processing Facilities, Land Treatment Facilities, Waste Piles, Storage Surface Impoundments, and Landfills
B. Additional Requirements for Land Treatment Facilities (Reserved)
C. Additional Requirements for Waste Piles (Reserved)
D. Additional Requirements for Storage Surface Impoundments (Reserved)
E. Additional Requirements for Landfills (and Surface Impoundments Closed as Landfills with Wastes in Place) (Reserved)
F. Flooding
G. Additional Information Requirements
Table II – Facility Siting Criteria Information

III. Facility Management

A. Compliance History and Applicant Experience
B. Personnel Training Plan
C. Security
D. Inspection Schedule
E. Contingency Plan
F. Emergency Response Plan

Table III.D. - Inspection Schedule
Table III.E.1. - Arrangements with Local Authorities
Table III.E.2. - Emergency Coordinators
Table III.E.3. - Emergency Equipment

IV. Wastes And Waste Analysis

Attachment D - List of Incorporated Application Materials

A. Waste Management Information (Reserved)
B. Wastes Managed In Permitted Units
C. Sampling and Analytical Methods
D. Waste Analysis Plan

Table IV.B. - Wastes Managed in Permitted Units
Table IV.C. - Sampling and Analytical Methods

V. Engineering Reports

A. General Engineering Reports
B. Container Storage Areas
C. Tanks and Tank Systems
D. Surface Impoundments (Reserved)
E. Waste Piles (Reserved)
F. Land Treatment Units (Reserved)
G. Landfills (Reserved)
H. Incinerators (Reserved)
I. Boilers and Industrial Furnaces (Reserved)
J. Drip Pads (Reserved)
K. Miscellaneous Units (Reserved)
L. Containment Buildings (Reserved)

Table V.A. Facility Waste Management Handling Units
Table V.B. - Container Storage Areas
Table V.C. - Tanks and Tank Systems

VI. Geology Report

A. Geology and Topography
B. Facility Groundwater (Reserved)
C. Exemption from Groundwater Monitoring for an Entire Facility (Reserved)
D. Unsaturated Zone Monitoring (Reserved)

VII. Closure And Post-Closure Plans

A. Closure
B. Closure Cost Estimate
C. Post-closure (Reserved)
D. Post-closure Cost Estimate (Reserved)
E. Closure and Post-Closure Cost Summary (Reserved)

Table VII.A. - Unit Closure
Table VII.B. - Unit Closure Cost Estimate

VIII. Financial Assurance

A. Financial Assurance Information Requirements for all Applicants
B. Applicant Financial Disclosure Statements for a new permit, permit amendment, or permit modification, or permit renewal
C. Applicants Requesting Facility Expansion, Capacity Expansion, or New Construction

Attachment D - List of Incorporated Application Materials

Information for Applicants Subject to Financial Capability Requirements (Reserved)

IX. Releases From Solid Waste Units And Corrective Action

A. Preliminary Review Checklists
For Applications for a New Hazardous Waste Permit (Reserved)
For Applications for a Renewal/Amendment/Modification of an Existing Hazardous Waste Permit
Preliminary Review Facility Checklist
Preliminary Review Unit Checklist
Appendices to Preliminary Review (PR)

X. Air Emission Standards

A. Process Vents
B. Equipment Leaks
C. Tanks, Surface Impoundments, and Containers
D. "One - Stop" Permit

Table X.A. - Process Vents
Table X.B. - Equipment Leaks
Table X.C. - Tanks, Surface Impoundments, and Containers Subject to Air Emission Controls
Table X.D.1(a) - Emission Point Parameters
General Instructions for Table X.D.1(a)
Table X.D.7 - For Fugitive Sources
Table 74-82 - Storage Tank Summary

XI. Compliance Plan (Reserved)
XII. Hazardous Waste Permit Application Fee
Table XII.A. – Hazardous Waste Units (For Application Fee Calculations)
Table XII.B. - Hazardous Waste Permit Application Fee Worksheet

XIII. Confidential Material (Reserved)

Attachment E - List of Permitted Facility Units

Authorized Permitted Units

TCEQ Permit Unit No.[1]	Unit Name	NOR No.[1]	Unit Description	Capacity	Unit Status[2]
1	Process Container Storage Area, CS-1	001	Container Storage Area	6,600	Active
2	Process Container Storage Area, CS-2	003	Container Storage Area	88,880	Active
3	Process Container Storage Area, CS-3	017	Container Storage Area	11,110	Active
4	Process Container Storage Area, CS-4	002	Container Storage Area	48,400	Active
5	Process Container Storage Area, CS-5	015	Container Storage Area	880	Active
6	Process Container Storage Area, CS-6	016	Container Storage Area	15,840	Active
8	PT-2	020	Tank	1,870	Active
9	PT-11	021	Tank	1,615	Active
14	PT-5	030	Tank	7,000	Active
15	WW-2	039	Tank	6,500	Proposed to Close
16	PT-12	051	Tank	1,548	Active

Historical Permitted Units No Longer Subject to this Permit[4]

TCEQ Permit Unit No.[1]	Unit Name	NOR No.[1]	Unit Description[3]	Capacity	Unit Status[2]
7	PT-1	019	Tank, Clean Closed 10-7-2003, Cut-up and Disposed		Closed

Attachment E - List of Permitted Facility Units

10	FB-1	008	Tank, Clean Closed 5-29-2009 Cut-up and Disposed	4,000	Closed
11	FB-2	009	Tank, Clean Closed 5-29-2009 Cut-up and Disposed	4,000	Closed
12	FB-3	010	Tank, Clean Closed 5-29-2009 Cut-up and Disposed	4,000	Closed
13	FB-4	011	Tank, Clean Closed 5-29-2009 Cut-up and Disposed	4,000	Closed

[1]Permitted Unit No. and NOR No. cannot be reassigned to new units or used more than once and all units that were in the Attachment D of a previously issued permit must be listed.
[2]Unit Status options: Active, Closed, Inactive (built but not managing waste), Proposed (not yet built), Never Built, Transferred, Post-Closure.
[3]If a unit has been transferred, the applicant should indicate which facility/permit it has been transferred to in the Unit Description column of Table V.A.
[4]The historical units are closed and/or no longer subject to RCRA permit requirements and [is/are] included in this table for informational purposes.

Attachment F - Emission Sources - Maximum Allowable Emission Rates

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
CAR010211	Carbon Bed 010211 and Scrubber SCR010211 PT-2 and PT-11 through SCR010211	VOC (5)	1.80	3.29
		Cl2 (5)	1.06	0.19
		HCl (6)	0.72	0.91
		SO2 (6)	0.76	0.27
CAR30	Carbon Bed controlling Lab Pack Fume Hoods	VOC	0.11	0.50
SCR30	Scrubber controlling Lab Packs	HCl	<0.01	<0.01
SPCT 010211	Chemical Treatment Area Caustic Scrubber	IOC	<0.01	<0.01
SCR 36 / SPCAU36	Cylinder QC Caustic Scrubber	HCl	<0.01	<0.01
PT-5	Caustic Storage Tank	IOC	<0.01	<0.01
Fugitives	Fugitives (7)	VOC	0.63	2.76
SCR12	PT-12 Process Tank PT-12 through WPS12 and SCR12	PM	0.10	0.08
		PM10	0.10	0.08
		PM2.5	0.02	0.02
		NOX	0.91	0.23
		SO2	0.06	0.25
		HF	0.15	0.66
		HCL	1.58	2.39

Attachment F - Emission Sources - Maximum Allowable Emission Rates

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
		CL2	0.36	0.79
		Ammonia	1.50	6.57
		H2S	0.83	0.50
		IOC	11.08	26.22

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) Exempt Solvent - Those carbon compounds or mixtures of carbon compounds used as solvents which have been excluded from the definition of volatile organic compound.
VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1. Total VOC includes HAPs.
IOC-U - inorganic compounds (unspeciated)
NO_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented
PM_{10} - total particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$, as represented
$PM_{2.5}$ - particulate matter equal to or less than 2.5 microns in diameter
HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
(5) Emissions when controlling Process Tank PT-11.
(6) Emissions when controlling Process Tank PT-2.
(7) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

EMERGENCY EQUIPMENT (ref. Table III.E.3. of TNRCC Application Instructions)

Included below is a list of all types of emergency equipment at the facility (such as fire-extinguishing systems, spill-control equipment, communications and alarm systems (internal and external), and decontamination equipment). The list includes a physical description of each item on the list and a brief outline of its capabilities.

ITEM	LOCATION	PHYSICAL DESCRIPTION	CAPABILITIES
Fire Extinguishing Systems	CS-1, CS-2, CS-3	Automatic High Expansion Foam Fire Suppression System	Extinguish Class A & B Fires after thermal detectors identify a temperature rise of 15°F in #1 or a maximum temperature of 190°F.
	CS-4	Automatic Total Flooding Dry Chemical Fire Suppression System	Class A, B & C Fires after thermal detectors identify a temperature rise of 15EF in #1 or a maximum temperature of 190EF.
	PT-11 Hydrolysis Booth, CS-6	Manual Stationary Push Button Dry Chemical Fire Suppression System	Extinguish Class A, B & C Fires
	CS-1, CS-2, CS-3, CS-4	11 - 20 Pound Portable Fire Extinguishers	Extinguish Class A, B & C Fires
	CS-1 and CS-5	2 - Ansul Metal-X Hand Held Fire Extinguishers	Extinguish Class D Fires (Water Reactives)
	CS-1	1 - Ansul Metal-X Wheel Mounted Fire Extinguishers	Extinguish Class D Fires (Water Reactives)
	East and West of CS-4	2 - Ansul-33-D Wheel Mounted Foam Fire Extinguishers	Extinguish fires involving flammable liquids.
	CS-1 and CS-3	Automatic dry chemical extinguishing system in hoods.	Class A, B & C Fires after thermal detectors identify a temperature rise of 15°F in #1 or a maximum temperature of 190°F.
	South side of facility	2 - City of Houston Fire Hydrants	Class A, B Fires
Spill Control Equipment	CS-1, CS-2, CS-3	Clay Based Absorbent	Absorb organic and aqueous liquids
	CS-1, CS-2, CS-3	Brooms	Removal of solids
	CS-1, CS-2, CS-3	Non-Sparking Shovels	Removal of solids
	CS-1, CS-2, CS-3	Caustic Soda or Lime Powder	Neutralization of acids

ITEM	LOCATION	PHYSICAL DESCRIPTION	CAPABILITIES
	CS-1, CS-2, CS-3	85 gallon capacity salvage drums constructed of metal or polyethylene.	Overpack leaking drums
Communications and Alarm System	Laboratory, CS-2 Office	Telephone/Intercom/PA System	Internal and external Communications
	CS-1, CS-2, CS-3 (Outside of Buildings)	Fire alarm bell sounds when first thermal detector activates, horn sounds and strobe light flashes when second thermal detector activates.	Inform personnel to evacuate facility due to fire. Notify Monitoring Service which then notifies fire department.
Decontamination Equipment	CS-1, CS-2, CS-3, CS-4	5 - Stationary Safety Showers/Eywash Stations	Personnel Decontamination
	Material Supply Building	Hypochlorite Aqueous detergents	Removal of organic and inorganic chemicals from equipment.
	CS-1 and CS-2, Laboratory, Change Room	2 - Eye and Skin Neutralizer Stations equipped with buffer solution.	Neutralization of chemical burns
Personal Protective Equipment	Employee Issued	Chemical resistant steel toad boots (PVC, Rubber or Neoprene)	Protect feet from chemical exposure and falling/rolling objects.
	Employee Issued	Full face air purifying respirators	Personal protection from inhalation of hazardous vapors and particulates.
	Employee Issued	Safety glasses, goggles and face shields	Protect eyes from chemical splashes.
	Employee Issued	Hard Hat	Protect head from falling or flying objects.
	Employee	Uniform (Long sleeve shirt and pants)	General protection
	Material Supply Building	Chemical resistant gloves (e.g., Nitrile, Butyl Rubber, Neoprene, Silver Shield)	Protection hands from chemical hazards.
	Material Supply Building	Coverall (e.g., Tyvek, Saranek)	Protect skin from chemical hazards.
	Material Supply Building	Boot Covers (Tyvek, Saranek)	Control spread of contamination during spill response.
	Material Supply Building	Ear Plugs	Noise Protection
	Material Supply Building	2 - MSA supplied air respirators with egress bottle	Respiratory Protection
	Material Supply Building	2 - MSA 45 min rated SCBA	Respiratory Protection

ITEM	LOCATION	PHYSICAL DESCRIPTION	CAPABILITIES
	Material Supply Building	Level A Fully Encapsulated Suit (2)	Chemical Protection
Drum Manipulation Equipment	General	LPS Rated Forklifts	Movement of drums and other heavy equipment.
	General	Drum Hand Trucks	Manual movement of individual drums
	General	Forklift operated hydraulic drum tilter	Individual drum retrieval, movement and pouring.
	West of CS-4	Forklift mounted manual drum tilters	Individual drum pouring
	General	Manual Drum Deheaders	Remove tops from metal closed head drums.
	General	Cloth & Metal Drum Chimes	Lift drums for overpacking utilizing forklift.
	General	Steel Forklift Mounted Drum Grabbers	Lift and place or remove drums from pallets.
Other	CS-2, Lab Office	First Aid Kit	General
	Material Supply Building	Intrinsically safe flash light	Lighting

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2021

U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	0
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	0
(K)	(L)

Injury and Illness Types

Total number of…	(M)		
(1) Injury	0	(4) Poisoning	0
(2) Skin Disorder	0	(5) Hearing Loss	0
(3) Respiratory Condition	0	(6) All Other Illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Establishment information

Your establishment name: SET Environmental Inc.

Street: 5738 Cheswood

City: Houston State: TX Zip: 77087

Industry description (e.g., Manufacture of motor truck trailers)
Waste Treatment and Storage

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 5 3

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
5 6 2 2 1 1

Employment information

Annual average number of employees: 43

Total hours worked by all employees last year: 91,878

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Daniel Didier
Company executive

General Manager
Title

(713) 645-8710
Phone

1/17/2022
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2022

U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	0
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	0
(K)	(L)

Injury and Illness Types

Total number of...	(M)		
(1) Injury	0	(4) Poisoning	0
(2) Skin Disorder	0	(5) Hearing Loss	0
(3) Respiratory Condition	0	(6) All Other Illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Establishment information

Your establishment name SET Environmental Inc.

Street 5738 Cheswood

City Houston State TX Zip 77087

Industry description (e.g., Manufacture of motor truck trailers)
Waste Treatment and Storage

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 5 3

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
5 6 2 2 1 1

Employment information

Annual average number of employees 44

Total hours worked by all employees last year 97,138

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Chuck Kilgus
Company executive

General Manager
Title

(713) 645-8710
Phone

1/16/2023
Date

OSHA's Form 300A (Rev. 01/2004)
Summary of Work-Related Injuries and Illnesses

Year 2023

U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	1	0	1
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
4	0
(K)	(L)

Injury and Illness Types

Total number of… (M)			
(1) Injury	1	(4) Poisoning	0
(2) Skin Disorder	0	(5) Hearing Loss	0
(3) Respiratory Condition	1	(6) All Other Illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Establishment information

Your establishment name: SET Environmental Inc.

Street: 5738 Cheswood

City: Houston State: TX Zip: 77087

Industry description (e.g., Manufacture of motor truck trailers)
Waste Treatment and Storage

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
5 6 2 2 1 1

Employment information

Annual average number of employees: 46

Total hours worked by all employees last year: 100,856

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Chuck Kilgus
Company executive

General Manager
Title

(713) 645-8710
Phone

1/15/2024
Date

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 14, 2020

CERTIFIED MAIL #91 7199 9991 7038 7442 6487
RETURN RECEIPT REQUESTED

Mr. Daniel A. Didier, Compliance Director
SET Environmental, Inc.
5738 Cheswood St.
Houston, Texas 77087

Re: Notice of Enforcement for Compliance Evaluation Investigation at:
SET Environmental, 5738 Cheswood St., Houston (Harris County), Texas
Regulated Entity No.: 100607126, TCEQ SWR No.: 50267, Permit No.: 50267, EPA ID No.: TXD055135388

Dear Mr. Didier:

On October 8, 2019, Mr. Casimir Onwuka of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for industrial solid waste. During this investigation, certain outstanding alleged violations were documented and have been resolved based on subsequent corrective action. In addition, a certain alleged violation and additional issues were documented which remain outstanding. Enclosed is a summary which lists the investigation findings and recommended corrective actions. Additional recommended corrective actions may be provided by the Enforcement Division.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at http://www.tceq.texas.gov for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Houston Region Office at (713) 767-3500 or the Central Office Publications Ordering Team at 512-239-0028. Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at 800-490-9198.

Also, please be advised that the Legislature has granted enforcement powers to the TCEQ to carry out its mission to protect human health and the environment. Due to the apparent seriousness of one of the alleged violations, formal enforcement action has been initiated, and additional violations may be cited upon further review. We encourage you to immediately begin taking actions to address the outstanding alleged violation and additional issues.

In responding with prompt corrective action, the administrative penalty to be assessed may be limited.

The Commission recognizes that the great majority of the regulated community wants to prevent pollution and to comply with environmental laws. We dedicate considerable resources toward making voluntary compliance achievable. But where compliance has not been met it is our duty to protect the public and the environment by enforcing the state's environmental laws, regulations, and permits.

Also, if you believe the violations documented in this notice have been cited in error, **and** you have additional information that we are unaware of, you may request a meeting to discuss this enforcement matter. To request a meeting, send a letter describing the additional information to the address shown below.

Manager, Waste Section
Enforcement Division, MC 219
Re: Enforcement Meeting Request
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

If you or members of your staff have any questions, please feel free to contact Mr. Onwuka in the Houston Region Office at (713) 767-3606.

Sincerely,

Carlos Romo
for Guadalupe Quiroz

Guadalupe Quiroz, Team Leader
Waste Section
Houston Region Office

GQ/CEO/na

Enclosures: Summary of Investigation Findings

Summary of Investigation Findings

SET ENVIRONMENTAL
5738 CHESWOOD ST
HOUSTON, HARRIS COUNTY, TX 77087

Investigation # 1612830
Investigation Date: 10/08/2019

Additional ID(s): 50267
P00724
TXD055135388
50267

AREA OF CONCERN

Track No: 742002

30 TAC Chapter 335.69(d)(1)
40 CFR Chapter 262.34(c)(1)(i)
40 CFR Chapter 265.173(a)

Alleged Violation:

Investigation: 1612830 Comment Date: 03/30/2020

The facility failed to ensure that containers holding hazardous waste remain closed except when adding or removing waste.

Investigation of the Satellite Accumulation Areas (SAAs) in the facility's laboratory revealed two open containers holding hazardous waste when waste was not being added to or removed from the containers. Containers holding hazardous waste must remain closed except when adding or removing from the containers.

Recommended Corrective Action: The facility was requested to ensure that containers in SAAs remain closed except when adding or removing waste and provide documentation to the TCEQ to verify compliance.

Resolution: This alleged violation has been resolved as an area of concern based on subsequent corrective action performed by the facility. The laboratory technician closed both containers at the time of investigation.

Summary of Investigation Findings

SET ENVIRONMENTAL Investigation # 1612830

5738 CHESWOOD ST
HOUSTON, HARRIS COUNTY, TX 77087

Investigation Date: 10/08/2019

Additional ID(s): 50267
P00724
TXD055135388
50267

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF ENFORCEMENT

Track No: 741974 **Compliance Due Date: To Be Determined**
30 TAC Chapter 305.125(1)

PERMIT II.A.2./IV.B.3.a.

Alleged Violation:
Investigation: 1612830 Comment Date: 04/13/2020

No person may cause, suffer, allow, or permit any activity of storage or disposal of any industrial solid waste or municipal hazardous waste unless such activity is authorized by a permit, amended permit, or other authorization from the Texas Commission on Environmental Quality (commission) or its predecessor agencies; or permit its wastes to be stored, processed, or disposed of at an unauthorized facility or in violation of a permit.

The facility failed to prevent the receipt, storage, and shipment of unauthorized waste without the required permit.

On August 22, 2018, the facility accepted and stored for 36 days one 55-gallon drum containing 226 kilograms of polychlorinated biphenyl (PCB) contaminated waste without first obtaining authorization from the TCEQ. The facility also shipped the unauthorized waste to an unauthorized facility, US Ecology Texas, Robstown, Texas, for disposal in a landfill.

During the investigation, the facility representative indicated the waste had been excavated and disposed of at an authorized facility, Veolia ES Technical Solutions in Port Arthur, Texas.

Recommended Corrective Action: The facility shall ensure that only authorized wastes are received and stored onsite. The facility shall also ensure that wastes are disposed of at authorized facilities.

ALLEGED VIOLATION(S) NOTED AND RESOLVED ASSOCIATED TO A NOTICE OF ENFORCEMENT

Track No: 741985
30 TAC Chapter 335.152(a)(7)
40 CFR Chapter 264.173

PERMIT II.C.1.j. and C.2.g.

Alleged Violation:
Investigation: 1612830 Comment Date: 04/02/2020

The facility failed to ensure that containers holding hazardous waste were always closed except when adding or removing waste.

During the investigation of permitted Container Storage Areas (CSAs) CS-2 and CS-3, two 55-gallon drums and one 55-gallon drum, respectively, containg hazardous waste were open.

Recommended Corrective Action: The facility shall close the drums and provide documentation of corrective action taken to the TCEQ to verify compliance.

Resolution: This alleged violation has been resolved based on documentation, including photographs, received from the facility on December 20, 2019, indicating the drums have been fitted with new lids ensuring they remain closed.

Track No: 741993

30 TAC Chapter 305.125(1)

PERMIT V.A.1.

Alleged Violation:

Investigation: 1612830 Comment Date: 04/02/2020

The facility failed to clearly identify authorized units with signs indicating the "TCEQ Permit Unit No.", as required by the permit.

During the investigation, it was noted that permitted tank, PT-12, had no identifying sign, and signs on permitted Container Storage Areas (CSAs), CS1 and CS3 had faded and were illegible.

Recommended Corrective Action: The facility was requested to clearly identify the permitted units with signs indicating the authorized units as listed in the permit and provide documentation demonstrating corrective action taken to the TCEQ to verify compliance.

Resolution: This alleged violation has been resolved based on documentation including photographs, received from the facility on December 20, 2019, indicating that identifying signs have been placed on the identified permitted tank and CSAs.

ADDITIONAL ISSUES

Description	Additional Comments
Item #2	During the investigation, debris and equipment were observed in the secondary containment associated with a permitted tank, PT-2. The secondary containment should be operated free of debris and equipment to ensure maintenance of 100 percent capacity of the largest tank within its boundary. The facility was requested to clear the secondary containment of debris and equipment and to provide documentation demonstrating corrective action taken to the TCEQ to verify compliance. This additional issue has been addressed based on documentation received from the facility on December 20, 2019, indicating that the items and the equipment observed in the secondary containment have been removed.

Item #6	During the investigation of Container Storage Area (CSA), CS1, waste drums were observed with multiple labels, some indicating both hazardous and non-hazardous waste on the same drum. The facility representative explained that the labels became invalid once the waste drums and accompanying shipping manifests were processed to confirm the waste and barcodes generated to replace the labels for identification. The facility is advised to review the procedures for consideration of having markers or labels immediately removed or crossed out from containers once they become invalid to minimize mishandling of waste.

December 20, 2019

TCEQ
Casimir Onwuka
5425 Polk Street, Suite H
Houston, TX 77023

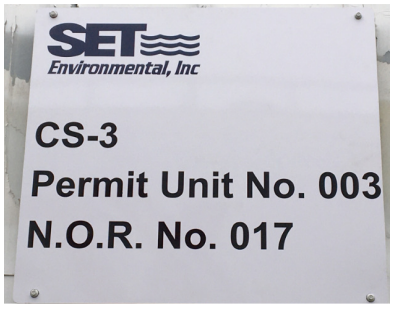
Re: Response to October 8, 2019 CEI
Registration/Permit No. 50267
EPA I.D. No. TXD055135388
CN600360200, RN100607126

Dear Mr. Onwuka,

Please accept this letter and attachments in response to issues identified during the October 8, CEI. Resolution of the investigation findings are summarized below and listed in the same order as they are listed in Exit Interview.

Issue 1: Missing Permit Sign for PT-12 and illegible permits signs for CS-1 and CS-3

Response: On 10/9/2019 SET Environmental added the sign for PT-12 and replaced the signs for CS-1 and CS-3 as pictured below.



Issue 2: Secondary containment was not free of debris for tank PT-2

Response: On 10/8/2019 SET Environmental removed pallets, a stool and a bucket from the containment system for PT-2.

Issue 3: Open containers in laboratory satellite accumulation area and in container storage area CS-2.

Response: During the inspection on 10/8/2019 SET Environmental closed the two satellite accumulation area containers in the laboratory fume hood. On 10/8/19 SET Environmental purchased new container lids for PPE disposal in the lab and CS-2. Lids were delivered and installed on Monday October 14th.

Satellite Accumulation in Lab Hood

PPE Drum in Lab

PPE Drums in CS-2

Remaining Issues 4-6: SET received and shipped unauthorized waste to an unauthorized facility. TCEQ requested a copy of clean-up plan and waste removal documentation.

Response: SET reported this issue to the TCEQ on July 28, 2019. US Ecology also reported to TCEQ Region 14 – Corpus Christi. During the CEI on October 8, 2019, SET explained and provided documents (manifests) that the unauthorized waste was removed from the landfill and disposed of properly. SET Environmental requested a copy of the clean-up plan from US Ecology on October 8th; however, the document SET received is attached.

If you have any questions regarding this response or require any additional information, please feel free to contact me at your convenience, ddidier@setenv.com of (713) 641-7574.

Sincerely,

Daniel A. Didier, CHMM
Compliance Director
SET Environmental, Inc

US ecology

3277 County Road 69, P.O. Box 307, Robstown, TX 78380
800.242.3209 361.387.0794

September 26, 2019

Tim Perdue
Waste Section Manager
Texas Commission on Environmental Quality
6300 Ocean Dr., Unit 5839
Corpus Christi, TX 78412-5839

RE: Notification of Incident- PCB drum
US Ecology Texas, Inc. - Robstown, Texas
TCEQ Permit No. HW-50052
EPA ID: TXD069452340-1
RN101445666/CN603247974

Dear Mr. Purdue,

As previously notified and discussed with TCEQ-Region 14 team members on July 19, 2019 and August 5, 2019 this letter serves as the report involving the 55-gallon PCB drum that was mistakenly sent to USET by SET Environmental for disposal as a non-TSCA regulated waste.

In summary, on September 28, 2018, the SET Environmental Houston facility sent, what was believed to be, one 55-gallon drum of non-hazardous waste to US Ecology Texas (USET). The SET Houston facility was later notified by the generator (North Shore Gas Company) that the drum apparently contained 116 ppm PCBs. Documents submitted to the SET Houston facility before the waste was received indicated that the waste was not TSCA regulated. The waste profile specified that waste contained less than 50 ppm PCB and the analysis submitted with the waste profile indicated that PCBs were below laboratory detection limits. During the review of the Annual PCB Summary Report, a SET program manager determined that the PCB analysis reported in ug/kg were incorrectly converted to ppm and the wrong analysis was submitted with the waste profile to the SET Houston facility.

The incident report was sent to USET on July 29, 2019 and includes the detailed investigation findings and corrective actions, please see Appendix 1. USET immediately notified TCEQ-Region 14 (Stephanie Lichtblau) on July 29, 2019and began removal of the material from the landfill on July 30, 2019. USET completed the removal actions on August 2, 2019. The removed

material was then placed into two-rolloff boxes and taken offsite for incineration to Veolia (Port Arthur, TX 77640) on September 18, 2019.

If you have any questions or need additional information regarding this incident, please contact me via email at celina.camarena@usecology.com or by phone at 361-387-3518 ext. 2223.

Sincerely,

Celina Camarena, Ph.D.
Environmental, Health and Safety Manager

cc: Mr. Srinath Venkat, P.E.
Industrial and Hazardous Waste Permits Section
Texas Commission on Environmental Quality
12100 Park 35 Circle, MC-130
Austin, Texas 78573

APPENDIX 1

SET Environmental, Inc.
Root-Cause Analysis Report

SET Environmental, Inc.

Root Cause Analysis Report

Incident Number: 2019-1327

Date of Incident: September 28, 2018

Description: A 55-gallon drum of waste liquids containing 116 ppm PCB-1254 was incorrectly transported to and disposed at the US Ecology Texas Landfill, Robstown, TX as non-TSCA regulated waste.

Prepared by: Stevan Pavlovich, CSP, CHMM Director, HSE

Approved by: Joel Tameling, President

Date Approved: July 29, 2019

Investigation Participants: Stevan Pavlovich, Kevin Kiefer, Nate Bartley

Executive Summary:

On Friday, September 28, 2018, a 55-gallon drum containing 226 kilograms of PCB-contaminated liquids was incorrectly transported from the SET Environmental, Inc. treatment, storage and disposal facility in Houston TX (SET TSDF) to the US Ecology hazardous waste landfill in Robstown TX as non-regulated waste where the waste was treated and disposed.

The drum was originally generated by the North Shore Gas Company, Libertyville, IL and SET Environmental, Inc. (SET) was contracted to transport and dispose of the waste. A sample was taken from the drum on June 6, 2018 and analysis of the sample completed on June 21, 2018. The analytical results report the sample as containing 116000 µg/kg (116 ppm) of PCB-1254 (Arochlor 1254).

An error was made by an SET Account Manager in converting the units from µg/kg, as reported on the analytical report, to ppm. This error contributed to an incorrect waste determination being made and this documented on the waste profile which describes the waste as containing < 50 ppm PCB. An additional error was made by an SET customer services representative who mistakenly attached the analytical results associated with another waste container at the same site which contained no detectable concentration of PCBs.

The waste profile and incorrect analytical report were submitted to the SET TSDF Approvals Coordinator who approved the waste for acceptance at the SET TSDF.

The waste drum was transported to the SET TSDF and received on 8/22/18. The drum was then stored at the SET TSDF until 9/27/18 when it was shipped to the US Ecology landfill for disposal.

On June 11, 2019, during review of the Annual PCB Summary Report for North Shore Gas Company, an SET program manager recognized that this report included an entry for waste shipped to the SET TSDF on 8/17/18. Follow up investigation after this review ultimately led to the discovery that one drum containing 116 ppm PCBs had been shipped to the Houston TSDF.

Detailed Description and Timeline of Events:

On June 1, 2018, SET received a request from WEC Energy Group (WEC), to collect samples for the purpose of disposing of several 55-gallon drums of waste located at North Shore Gas Company, 2101 W. Peterson Road, Libertyville, IL 60048.

North Shore Gas is a subsidiary of WEC which delivers natural gas to customers in Chicago's northern suburbs. Regulated levels of PCB contamination have previously been detected in the North Shore Gas (NSG) distribution system. The source of the PCB contamination is believed to be from PCB-containing lubricants that were used at one time in the propane injection system air compressors at the Peterson Road facility. This equipment was removed from the facility in 2017 during remediation and decommissioning of the affected engines. It is believed that the remaining source of PCB's at this facility, that were detected during analysis of waste drums, is associated with residual amounts present in piping or other similar equipment. There are no other known sources as defined in the EPA PCB regulations (e.g. scrubbers or filter separators that would accumulate PCB liquid) installed in the North Shore Gas distribution system.

On June 6, 2018, an SET Account Manager travelled to the site and sampled three, 55-gallon drums containing liquids. The drums were assigned and marked with the numbers 1, 2 and 3, respectfully. Both drum number 1 and drum number 2 had been previously labeled by the generator with a "Used Oil" and "Nonhazardous Waste" label. Drum Number 3 had been previously marked and labeled by the generator as containing "Antifreeze and Glycol" and a "Universal Waste" label was affixed to the drum.

A chain of custody form was created by the SET Account Manager and sample numbers were assigned on the chain of custody form as: "NSG Peterson Rd #1", "NSG Peterson Rd #2, and "NSG Peterson Rd #3" to correspond with the three drums (1, 2, and 3). The chain of custody and the three samples were then shipped to Pace Analytical Services, LLC (Pace) in Minneapolis, MN for analysis for PCB Oil.

The samples were received by Pace on 6/16/18 and analysis of the samples was completed on 6/21/18. The sample results, recorded on the "Pace Project No. 40170981" report *(Attachment*

A.), were provided to a WEC Senior Environmental Consultant (representative) and the SET Account Manager on 6/25/18.

Analytical results recorded on this report specify that:

Sample "NSG Peterson Rd #2" contains 10700 µg/kg of PCB-1254 (Arochlor 1254),

Sample "NSG Peterson Rd #3" contains 116000 µg/kg of PCB-1254 (Arochlor 1254) and,

Sample "NSG Peterson Rd #1" contains no PCB's at the limit of detection.

The WEC representative submitted an email to the SET Account Representative the same day indicating that 2 of the three drums contained greater than 10 ppm PCB's.

The SET Account Manager reviewed the analytical report and correctly converted the results for sample "NSG Peterson Rd #2" from 10700 µg/kg to 10.7 ppm. However, he incorrectly converted the results of sample NSG Peterson Rd #3" from 116000 µg/kg to 11.6 ppm. On 6/27/18 the Account Manager forwarded an email to his designated SET customer services representative (CSR) with a summary of the results for all three drums including the notation "Sample 3 55-gallon drum of used antifreeze – PCB at 11.6 ppm."

On 7/19/18, the same SET Account Manager returned to the North Shore Gas Site in Libertyville, IL to collect an additional sample from one, 55-gallon drum containing used oil. The Account Manager assigned and marked this container as # 5 and a corresponding sample Identification number was assigned and recorded on the chain of custody as "Peterson Rd Oil #5." This sample was delivered to the same Pace laboratory to test for the presence of PCB oils and the results documented on the "Pace Project No. 40173016" report *(Attachment B)*.

This report, which specified that no PCB's were present at the detection limit, was provided by Pace to a WEC representative on 7/30/18 and then forwarded to the SET CSR on 7/31/18.

On 8/01/18 the SET CSR submitted a request to the SET Profile Coordinator to determine if the SET TSDF, located in Houston, TX (USEPA ID number TXD055135388) could accept "low level PCB's in oily water and antifreeze." The email request included the description that Sample 2 represented a 55-gallon drum containing oily water containing PCB's at 10.7 ppm and that Sample 3 represented a 55-gallon drum of used antifreeze containing PCB's at 11.6 ppm. A copy of the "Pace Project No. 40170981" analytical report was also submitted to the profile coordinator. After requesting additional information regarding the process generating the waste and verification that the PCB's were not from a TSCA source, the SET Profile Coordinator created SET Profile number 134458 *(Attachment C)* on 8/7/18 to request acceptance of the two waste drums at the SET TSDF. The SET profile describes the waste name as "Oily water /

Antifreeze, non-TSCA PCB" and, in the Waste Composition section of the profile, lists PCB concentration at < 50 ppm.

On 8/20/18, the SET CSR submitted SET Profile 134458 to the WEC representative for signature. However, the CSR mistakenly attached the "Pace Project No. 40173016" laboratory report that listed the results for the "Peterson Rd Oil #5" sample that was obtained from Drum #5. The signed profile and incorrect analytical report were then submitted by the SET CSR to the SET TSDF Approvals Coordinator who approved the waste for acceptance at the SET Houston TSDF.

The waste drums were removed by an SET Chicago division driver on 8/17/18 and transported to the SET Houston TSDF where they were accepted on 8/22/18. Uniform Hazardous Waste Manifest number 017176269 JJK *(Attachment D)* was used as the tracking and shipping document for the waste shipment.

The drums were stored at the SET Houston TSDF until 9/28/18 on which date they were transported to US Ecology Landfill for disposal. Uniform Hazardous Waste Manifest number 019420893 JJK *(Attachment E)* was used as the tracking and shipping document for the waste shipment from the SET Houston TSDF to the US Ecology Landfill for disposal.

On June 11, 2019, during review of the Annual PCB Report Summary prepared for North Shore Gas Company, an SET Program Manager discovered this report included an entry for waste shipped to the SET TSDF on 8/17/18. The annual summary had been generated by SET to assist North Shore Gas (WEC) in meeting its annual recordkeeping and reporting requirements as specified in 40 CFR 761.180, Subpart J.

Follow up investigation from this review ultimately led to the discovery that one of the drums shipped to the Houston TSDF contained 116 ppm PCB's and that the total weight of material shipped in the drums was 226 kg.

Following this discovery, notification was made to officials at the Houston TSDF, US Ecology and to WEC Energy Group on July 18, 2019.

Causal Analysis:

Direct Causes

1. Human performance errors by SET Account Manager and Profile Coordinator in evaluating analytical results and correctly converting units from µg/kg to ppm.
   In reviewing the analytical results provided on the "Pace Project No. 40170981" report, the SET Account Manager, mistakenly converted the units for sample "NSG Peterson Rd #3" from 116000 µg/kg of PCB-1254 to 11.6 ppm. The Account Manager correctly

converted the results reported for "NSG Peterson Rd #2" sample from 10700 µg/kg of PCB-1254 to 10.7 PPM.
When questioned, the Account Manager stated he understands how to convert units between µg/kg and ppm and was able to demonstrate the correct conversion of units.

The Account Manager distributed an email to the SET CSR stating the results for "Sample 3" as 11.6 ppm PCB's which was then communicated to the SET Profile Coordinator. The Profile Coordinator is responsible for characterizing wastes in accordance with applicable regulations and completing waste profiles for disposal facilities on behalf of SET clients. Although, the Profile Coordinator had the correct analytical report, she failed to recognize that the results for sample number "NSG Peterson Rd #3", reported at 116000 µg/kg of PCB-1254, would, after conversion of units, indicate a concentration of 116 ppm and not 11.6 ppm as stated on the email received from the SET CSR.

The Approvals Coordinator has extensive knowledge and experience in reviewing analytical reports and characterizing wastes on behalf of SET clients. It appears this human performance error was not due to a lack of knowledge.

2. Human performance error by SET Customer Service Representative when attaching the incorrect analytical report.
   After receiving the completed SET profile 134458 from the SET Approvals Coordinator, the SET Customer Services Representative mistakenly submitted an incorrect analytical report (Pace Project 40173016), in association with the waste profile, to the WEC representative for signature. Additionally, both the signed profile and incorrect analysis was submitted to the SET TSDF Approvals Coordinator. As a result, the Approvals Coordinator received a profile that incorrectly listed the waste name as "Oily water / Antifreeze, non-TSCA PCB" and listed the PCB concentration of the waste at < 50 ppm as well as an analytical report that specified no detectable levels of PCB's.

   Based on the information listed on the profile and analytical report, the waste was approved for acceptance at the SET TSDF as a non-TSCA regulated waste.

Contributing Factors

1. Characterizing waste for regulatory requirements required conversion of units
   While regulatory requirements for disposal of PCB's are expressed in parts per million (ppm), the analytical report expressed the results of the PCB analysis in micrograms per kilogram (µg/kg). This required a conversion of units to milligrams per kilogram (mg/kg) which is equal to ppm. If the analytical report had expressed the PCB concentrations in ppm, conversion of units would not have been required and the likelihood of errors in classifying the waste for disposal would have been significantly reduced.

2. Communication of incorrect results by Account Manager and CSR
   The Profile Coordinator assumed that the PCB concentration of 11.6, specified in the email correspondence from the CSR, for "Sample 3" was correct.

Root Cause

1. Inadequate safeguards to correct errors during waste characterization and profiling
   The current process used by SET to characterize waste streams in accordance with regulatory requirements and complete accurate waste profiles includes provisions to assure quality. Included among these are:

   - Limiting the role of waste characterization and profile creation to qualified individuals dedicated to this task and;

   - In the case of waste streams shipped to the SET TSDF, having an Approvals Coordinator, independent of the waste characterization role, who verifies information provided on waste profiles, analytical reports and other sources of information.

   In this incident, due to the errors made by the Account Manager, Profile Coordinator and Customer Services Representative, the SET TSDF Approvals Coordinator received an inaccurate waste profile and the wrong analytical report which eliminated the possibility of recognizing the discrepancy which existed between the profile and correct analytical report.

   Investigation of this incident discovered some significant findings, related to the waste characterization and profile creation process, which include:

a. The waste profile does not include a reference to the associated analytical reports. Having a reference on the profile, or associated document, to the analytical report number could provide an additional quality assurance safeguard.

b. The CSR, after receiving the signed profile, submitted the profile and wrong analysis directly to the Approvals Coordinator. The preferred practice, during SET's waste approval process, is for the signed profile to be submitted back to the Profile Coordinator who then submits the signed profile, analysis and other supporting documentation to the Approvals Coordinator. Had this occurred, it is less likely that the incorrect analysis would have being submitted to the Approvals Coordinator.

Corrective Actions:

SET is currently in the late stages of development of an updated waste tracking management system that will be used in association with SET's TSDF and all third party TSFDs. This upgrade will offer significantly improved quality assurance features and support to personnel tasked with characterization of waste streams and creation of waste profiles, manifests, and labels Preliminary testing of the new software is scheduled to begin in August 2019 and a company-wide roll out is planned for January 1, 2020.

The following are some of the features of the revised program to help eliminate errors during characterization of waste streams and creation of profiles:

1. Defined user roles are established that limit system access to qualified staff who are authorized to characterize waste and create waste profiles.

2. The system will require that results for key analytes (including PCB, RCRA metals, etc.) must be entered into the waste profile section as they appear on the analytical report. Programming will automatically convert units for comparison with regulatory levels.

3. An enhanced attachments tab has been developed that allows for multiple documents (analytical results, correspondence, signed documents) to be uploaded for review/approval at the time of profile creation.

4. Newly created Analytical tab has been created which will require, for all waste streams, the entry of the laboratory report number, sample ID number and chain of custody number, when an analytical report has been submitted as part of waste characterization.

5. The creation of a new SET profile document which includes a section that identifies the analytical report numbers associated with the waste stream to alert the generator and the Approval Coordinator.

List of Attachments

Attachment A	Pace Project No. 40170981 Analytical Results
Attachment B	Pace Project No. 40173016 Analytical Results
Attachment C	SET Profile Number 134458
Attachment D	Uniform Hazardous Waste Number 017176269 JJK
Attachment E	Uniform Hazardous Waste Number 019420893 JJK

SET Environmental, Inc

July 29, 2019

Texas Commission on Environmental Quality
Industrial and Hazardous Waste Permits Section, MC130
Waste Permits Division
P.O. Box 13087
Austin, Texas 78711-3087
Attn: Mr. Michael Pimentel

Re: Improper Disposal of PCB Contaminated Waste
Industrial and Solid Waste Registration No. 50267
Hazardous Waste Permit No. 50267
EPA ID No. TXD055135388
CN600360200; RN100607126

Dear Mr. Pimentel,

On September 28, 2018, the SET Environmental Houston facility forwarded, what was believed to be, one 55-gallon drum of non-hazardous waste to US Ecology in Robstown Texas. The SET Houston facility was subsequently notified that the drum apparently contained 116 ppm PCBs.

The SET Environmental Houston facility was notified of this incident in writing today. The notification that includes detailed investigation findings and corrective actions is attached.

In summary, documents submitted to the SET Houston facility before the waste was received indicated that the waste was not TSCA regulated. The waste profile specified that waste contained less than 50 ppm PCB (Attachment C of Incident Investigation) and the analysis submitted with the waste profile indicated that PCBs were below laboratory detection limits (Attachment B of Incident Investigation).

The investigation determined that the PCB analysis reported in ug/kg were incorrectly converted to ppm and the wrong analysis was submitted with the waste profile to the SET Houston facility.

The investigation report was sent to US Ecology and the generator of the waste today. US Ecology intends to notify the TCEQ and the generator stated that they intend on notifying the USEPA.

If you have any questions regarding this incident, please feel free to contact me at your convenience ddidier@setenv.com.

Sincerely,

Daniel A. Didier, CHMM
Compliance Director
SET Environmental, Inc

cc: Ms. Nicole Bealle, Program Manager, Industrial and Hazardous Waste, TCEQ - Region 12

SET Environmental, Inc

July 29, 2019

Texas Natural Resource Conservation Commission, Region 12
Industrial and Hazardous Waste
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486
Attn: Ms. Nicole Bealle

Re: Improper Disposal of PCB Contaminated Waste
Industrial and Solid Waste Registration No. 50267
Hazardous Waste Permit No. 50267
EPA ID No. TXD055135388
CN600360200; RN100607126

Dear Nicole,

Please see attached notification to our Permit Writer in Austin regarding the improper disposal of TSCA regulated PCB waste at US Ecology in Robstown, TX.

On September 28, 2018, the SET Environmental Houston facility forwarded, what was believed to be, one 55-gallon drum of non-hazardous waste to US Ecology in Robstown Texas. The SET Houston facility was subsequently notified that the drum apparently contained 116 ppm PCBs.

In summary, documents submitted to the SET Houston facility before the waste was received indicated that the waste was not TSCA regulated. The waste profile specified that waste contained less than 50 ppm PCB (Attachment C of Incident Investigation) and the analysis submitted with the waste profile indicated that PCBs were below laboratory detection limits (Attachment B of Incident Investigation).

The investigation determined that the PCB analysis reported in ug/kg were incorrectly converted to ppm and the wrong analysis was submitted with the waste profile to the SET Houston facility.

If you have any questions regarding this incident, please feel free to contact me at your convenience ddidier@setenv.com.

Sincerely,

Daniel A. Didier, CHMM
Compliance Director

SET Environmental, Inc.

Root Cause Analysis Report

Incident Number: 2019-1327

Date of Incident: September 28, 2018

Description: A 55-gallon drum of waste liquids containing 116 ppm PCB-1254 was incorrectly transported to and disposed at the US Ecology Texas Landfill, Robstown, TX as non-TSCA regulated waste.

Prepared by: Stevan Pavlovich, CSP, CHMM Director, HSE

Approved by: Joel Tameling, President

Date Approved: July 29, 2019

Investigation Participants: Stevan Pavlovich, Kevin Kiefer, Nate Bartley

Executive Summary:

On Friday, September 28, 2018, a 55-gallon drum containing 226 kilograms of PCB-contaminated liquids was incorrectly transported from the SET Environmental, Inc. treatment, storage and disposal facility in Houston TX (SET TSDF) to the US Ecology hazardous waste landfill in Robstown TX as non-regulated waste where the waste was treated and disposed.

The drum was originally generated by the North Shore Gas Company, Libertyville, IL and SET Environmental, Inc. (SET) was contracted to transport and dispose of the waste. A sample was taken from the drum on June 6, 2018 and analysis of the sample completed on June 21, 2018. The analytical results report the sample as containing 116000 µg/kg (116 ppm) of PCB-1254 (Arochlor 1254).

An error was made by an SET Account Manager in converting the units from µg/kg, as reported on the analytical report, to ppm. This error contributed to an incorrect waste determination being made and this documented on the waste profile which describes the waste as containing < 50 ppm PCB. An additional error was made by an SET customer services representative who mistakenly attached the analytical results associated with another waste container at the same site which contained no detectable concentration of PCBs.

The waste profile and incorrect analytical report were submitted to the SET TSDF Approvals Coordinator who approved the waste for acceptance at the SET TSDF.

The waste drum was transported to the SET TSDF and received on 8/22/18. The drum was then stored at the SET TSDF until 9/27/18 when it was shipped to the US Ecology landfill for disposal.

On June 11, 2019, during review of the Annual PCB Summary Report for North Shore Gas Company, an SET program manager recognized that this report included an entry for waste shipped to the SET TSDF on 8/17/18. Follow up investigation after this review ultimately led to the discovery that one drum containing 116 ppm PCBs had been shipped to the Houston TSDF.

Detailed Description and Timeline of Events:

On June 1, 2018, SET received a request from WEC Energy Group (WEC), to collect samples for the purpose of disposing of several 55-gallon drums of waste located at North Shore Gas Company, 2101 W. Peterson Road, Libertyville, IL 60048.

North Shore Gas is a subsidiary of WEC which delivers natural gas to customers in Chicago's northern suburbs. Regulated levels of PCB contamination have previously been detected in the North Shore Gas (NSG) distribution system. The source of the PCB contamination is believed to be from PCB-containing lubricants that were used at one time in the propane injection system air compressors at the Peterson Road facility. This equipment was removed from the facility in 2017 during remediation and decommissioning of the affected engines. It is believed that the remaining source of PCB's at this facility, that were detected during analysis of waste drums, is associated with residual amounts present in piping or other similar equipment. There are no other known sources as defined in the EPA PCB regulations (e.g. scrubbers or filter separators that would accumulate PCB liquid) installed in the North Shore Gas distribution system.

On June 6, 2018, an SET Account Manager travelled to the site and sampled three, 55-gallon drums containing liquids. The drums were assigned and marked with the numbers 1, 2 and 3, respectfully. Both drum number 1 and drum number 2 had been previously labeled by the generator with a "Used Oil" and "Nonhazardous Waste" label. Drum Number 3 had been previously marked and labeled by the generator as containing "Antifreeze and Glycol" and a "Universal Waste" label was affixed to the drum.

A chain of custody form was created by the SET Account Manager and sample numbers were assigned on the chain of custody form as: "NSG Peterson Rd #1", "NSG Peterson Rd #2, and "NSG Peterson Rd #3" to correspond with the three drums (1, 2, and 3). The chain of custody and the three samples were then shipped to Pace Analytical Services, LLC (Pace) in Minneapolis, MN for analysis for PCB Oil.

The samples were received by Pace on 6/16/18 and analysis of the samples was completed on 6/21/18. The sample results, recorded on the "Pace Project No. 40170981" report *(Attachment*

A.), were provided to a WEC Senior Environmental Consultant (representative) and the SET Account Manager on 6/25/18.

Analytical results recorded on this report specify that:

Sample "NSG Peterson Rd #2" contains 10700 µg/kg of PCB-1254 (Arochlor 1254),

Sample "NSG Peterson Rd #3" contains 116000 µg/kg of PCB-1254 (Arochlor 1254) and,

Sample "NSG Peterson Rd #1" contains no PCB's at the limit of detection.

The WEC representative submitted an email to the SET Account Representative the same day indicating that 2 of the three drums contained greater than 10 ppm PCB's.

The SET Account Manager reviewed the analytical report and correctly converted the results for sample "NSG Peterson Rd #2" from 10700 µg/kg to 10.7 ppm. However, he incorrectly converted the results of sample NSG Peterson Rd #3" from 116000 µg/kg to 11.6 ppm. On 6/27/18 the Account Manager forwarded an email to his designated SET customer services representative (CSR) with a summary of the results for all three drums including the notation "Sample 3 55-gallon drum of used antifreeze – PCB at 11.6 ppm."

On 7/19/18, the same SET Account Manager returned to the North Shore Gas Site in Libertyville, IL to collect an additional sample from one, 55-gallon drum containing used oil. The Account Manager assigned and marked this container as # 5 and a corresponding sample Identification number was assigned and recorded on the chain of custody as "Peterson Rd Oil #5." This sample was delivered to the same Pace laboratory to test for the presence of PCB oils and the results documented on the "Pace Project No. 40173016" report *(Attachment B*).

This report, which specified that no PCB's were present at the detection limit, was provided by Pace to a WEC representative on 7/30/18 and then forwarded to the SET CSR on 7/31/18.

On 8/01/18 the SET CSR submitted a request to the SET Profile Coordinator to determine if the SET TSDF, located in Houston, TX (USEPA ID number TXD055135388) could accept "low level PCB's in oily water and antifreeze." The email request included the description that Sample 2 represented a 55-gallon drum containing oily water containing PCB's at 10.7 ppm and that Sample 3 represented a 55-gallon drum of used antifreeze containing PCB's at 11.6 ppm. A copy of the "Pace Project No. 40170981" analytical report was also submitted to the profile coordinator. After requesting additional information regarding the process generating the waste and verification that the PCB's were not from a TSCA source, the SET Profile Coordinator created SET Profile number 134458 *(Attachment C)* on 8/7/18 to request acceptance of the two waste drums at the SET TSDF. The SET profile describes the waste name as "Oily water /

Antifreeze, non-TSCA PCB" and, in the Waste Composition section of the profile, lists PCB concentration at < 50 ppm.

On 8/20/18, the SET CSR submitted SET Profile 134458 to the WEC representative for signature. However, the CSR mistakenly attached the "Pace Project No. 40173016" laboratory report that listed the results for the "Peterson Rd Oil #5" sample that was obtained from Drum #5. The signed profile and incorrect analytical report were then submitted by the SET CSR to the SET TSDF Approvals Coordinator who approved the waste for acceptance at the SET Houston TSDF.

The waste drums were removed by an SET Chicago division driver on 8/17/18 and transported to the SET Houston TSDF where they were accepted on 8/22/18. Uniform Hazardous Waste Manifest number 017176269 JJK *(Attachment D)* was used as the tracking and shipping document for the waste shipment.

The drums were stored at the SET Houston TSDF until 9/28/18 on which date they were transported to US Ecology Landfill for disposal. Uniform Hazardous Waste Manifest number 019420893 JJK *(Attachment E)* was used as the tracking and shipping document for the waste shipment from the SET Houston TSDF to the US Ecology Landfill for disposal.

On June 11, 2019, during review of the Annual PCB Report Summary prepared for North Shore Gas Company, an SET Program Manager discovered this report included an entry for waste shipped to the SET TSDF on 8/17/18. The annual summary had been generated by SET to assist North Shore Gas (WEC) in meeting its annual recordkeeping and reporting requirements as specified in 40 CFR 761.180, Subpart J.

Follow up investigation from this review ultimately led to the discovery that one of the drums shipped to the Houston TSDF contained 116 ppm PCB's and that the total weight of material shipped in the drums was 226 kg.

Following this discovery, notification was made to officials at the Houston TSDF, US Ecology and to WEC Energy Group on July 18, 2019.

Causal Analysis:

<u>Direct Causes</u>

1. <u>Human performance errors by SET Account Manager and Profile Coordinator in evaluating analytical results and correctly converting units from µg/kg to ppm.</u>
   In reviewing the analytical results provided on the "Pace Project No. 40170981" report, the SET Account Manager, mistakenly converted the units for sample "NSG Peterson Rd #3" from 116000 µg/kg of PCB-1254 to 11.6 ppm. The Account Manager correctly

converted the results reported for “NSG Peterson Rd #2” sample from 10700 µg/kg of PCB-1254 to 10.7 PPM.
When questioned, the Account Manager stated he understands how to convert units between µg/kg and ppm and was able to demonstrate the correct conversion of units.

The Account Manager distributed an email to the SET CSR stating the results for “Sample 3” as 11.6 ppm PCB’s which was then communicated to the SET Profile Coordinator. The Profile Coordinator is responsible for characterizing wastes in accordance with applicable regulations and completing waste profiles for disposal facilities on behalf of SET clients. Although, the Profile Coordinator had the correct analytical report, she failed to recognize that the results for sample number “NSG Peterson Rd #3”, reported at 116000 µg/kg of PCB-1254, would, after conversion of units, indicate a concentration of 116 ppm and not 11.6 ppm as stated on the email received from the SET CSR.

The Approvals Coordinator has extensive knowledge and experience in reviewing analytical reports and characterizing wastes on behalf of SET clients. It appears this human performance error was not due to a lack of knowledge.

2. <u>Human performance error by SET Customer Service Representative when attaching the incorrect analytical report.</u>
   After receiving the completed SET profile 134458 from the SET Approvals Coordinator, the SET Customer Services Representative mistakenly submitted an incorrect analytical report (Pace Project 40173016), in association with the waste profile, to the WEC representative for signature. Additionally, both the signed profile and incorrect analysis was submitted to the SET TSDF Approvals Coordinator. As a result, the Approvals Coordinator received a profile that incorrectly listed the waste name as “Oily water / Antifreeze, non-TSCA PCB” and listed the PCB concentration of the waste at < 50 ppm as well as an analytical report that specified no detectable levels of PCB’s.

   Based on the information listed on the profile and analytical report, the waste was approved for acceptance at the SET TSDF as a non-TSCA regulated waste.

Contributing Factors

1. Characterizing waste for regulatory requirements required conversion of units
   While regulatory requirements for disposal of PCB's are expressed in parts per million (ppm), the analytical report expressed the results of the PCB analysis in micrograms per kilogram (µg/kg). This required a conversion of units to milligrams per kilogram (mg/kg) which is equal to ppm. If the analytical report had expressed the PCB concentrations in ppm, conversion of units would not have been required and the likelihood of errors in classifying the waste for disposal would have been significantly reduced.

2. Communication of incorrect results by Account Manager and CSR
   The Profile Coordinator assumed that the PCB concentration of 11.6, specified in the email correspondence from the CSR, for "Sample 3" was correct.

Root Cause

1. Inadequate safeguards to correct errors during waste characterization and profiling
   The current process used by SET to characterize waste streams in accordance with regulatory requirements and complete accurate waste profiles includes provisions to assure quality. Included among these are:

   - Limiting the role of waste characterization and profile creation to qualified individuals dedicated to this task and;

   - In the case of waste streams shipped to the SET TSDF, having an Approvals Coordinator, independent of the waste characterization role, who verifies information provided on waste profiles, analytical reports and other sources of information.

   In this incident, due to the errors made by the Account Manager, Profile Coordinator and Customer Services Representative, the SET TSDF Approvals Coordinator received an inaccurate waste profile and the wrong analytical report which eliminated the possibility of recognizing the discrepancy which existed between the profile and correct analytical report.

   Investigation of this incident discovered some significant findings, related to the waste characterization and profile creation process, which include:

a. The waste profile does not include a reference to the associated analytical reports. Having a reference on the profile, or associated document, to the analytical report number could provide an additional quality assurance safeguard.

b. The CSR, after receiving the signed profile, submitted the profile and wrong analysis directly to the Approvals Coordinator. The preferred practice, during SET's waste approval process, is for the signed profile to be submitted back to the Profile Coordinator who then submits the signed profile, analysis and other supporting documentation to the Approvals Coordinator. Had this occurred, it is less likely that the incorrect analysis would have being submitted to the Approvals Coordinator.

Corrective Actions:

SET is currently in the late stages of development of an updated waste tracking management system that will be used in association with SET's TSDF and all third party TSFDs. This upgrade will offer significantly improved quality assurance features and support to personnel tasked with characterization of waste streams and creation of waste profiles, manifests, and labels Preliminary testing of the new software is scheduled to begin in August 2019 and a company-wide roll out is planned for January 1, 2020.

The following are some of the features of the revised program to help eliminate errors during characterization of waste streams and creation of profiles:

1. Defined user roles are established that limit system access to qualified staff who are authorized to characterize waste and create waste profiles.

2. The system will require that results for key analytes (including PCB, RCRA metals, etc.) must be entered into the waste profile section as they appear on the analytical report. Programming will automatically convert units for comparison with regulatory levels.

3. An enhanced attachments tab has been developed that allows for multiple documents (analytical results, correspondence, signed documents) to be uploaded for review/approval at the time of profile creation.

4. Newly created Analytical tab has been created which will require, for all waste streams, the entry of the laboratory report number, sample ID number and chain of custody number, when an analytical report has been submitted as part of waste characterization.

5. The creation of a new SET profile document which includes a section that identifies the analytical report numbers associated with the waste stream to alert the generator and the Approval Coordinator.

List of Attachments

Attachment A	Pace Project No. 40170981 Analytical Results
Attachment B	Pace Project No. 40173016 Analytical Results
Attachment C	SET Profile Number 134458
Attachment D	Uniform Hazardous Waste Number 017176269 JJK
Attachment E	Uniform Hazardous Waste Number 019420893 JJK

Attachment A

Pace Project No. 40170981 Analytical Results

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

June 25, 2018

Andi Gregg
WEC Energy Group
333 W. Everett St.
Milwaukee, WI 53203

RE: Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

Dear Andi Gregg:
Enclosed are the analytical results for sample(s) received by the laboratory on June 16, 2018. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Laurie Woelfel

Laurie Woelfel
laurie.woelfel@pacelabs.com
(920)469-2436
Project Manager

Enclosures

cc: Bob Nimmo, SET Environmental

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

CERTIFICATIONS

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

Minnesota Certification IDs

1700 Elm Street SE, Suite 200, Minneapolis, MN 55414-2485
A2LA Certification #: 2926.01
Alabama Certification #: 40770
Alaska Contaminated Sites Certification #: 17-009
Alaska DW Certification #: MN00064
Arizona Certification #: AZ0014
Arkansas Certification #: 88-0680
California Certification #: 2929
CNMI Saipan Certification #:MP0003
Colorado Certification #: MN00064
Connecticut Certification #: PH-0256
EPA Region 8+Wyoming DW Certification #: via MN 027-053-137
Florida Certification #: E87605
Georgia Certification #: 959
Guam EPA Certification #: MN00064
Hawaii Certification #: MN00064
Idaho Certification #: MN00064
Illinois Certification #: 200011
Indiana Certification #: C-MN-01
Iowa Certification #: 368
Kansas Certification #: E-10167
Kentucky DW Certification #: 90062
Kentucky WW Certification #: 90062
Louisiana DEQ Certification #: 03086
Louisiana DW Certification #: MN00064
Maine Certification #: MN00064
Maryland Certification #: 322
Massachusetts Certification #: M-MN064
Michigan Certification #: 9909
Minnesota Certification #: 027-053-137
Mississippi Certification #: MN00064
Montana Certification #: CERT0092
Nebraska Certification #: NE-OS-18-06
Nevada Certification #: MN00064
New Hampshire Certification #: 2081
New Jersey Certification #: MN002
New York Certification #: 11647
North Carolina DW Certification #: 27700
North Carolina WW Certification #: 530
North Dakota Certification #: R-036
Ohio DW Certification #: 41244
Ohio VAP Certification #: CL101
Oklahoma Certification #: 9507
Oregon NwTPH Certification #: MN300001
Oregon Secondary Certification #: MN200001
Pennsylvania Certification #: 68-00563
Puerto Rico Certification #: MN00064
South Carolina Certification #:74003001
Tennessee Certification #: TN02818
Texas Certification #: T104704192
Utah Certification #: MN00064
Virginia Certification #: 460163
Washington Certification #: C486
West Virginia DW Certification #: 9952 C
West Virginia DEP Certification #: 382
Wisconsin Certification #: 999407970

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1241 Bellevue Street - Suite 9
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(920)469-2436

SAMPLE SUMMARY

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40170981001	**NSG PETERSON RD #1**	Non Aqueous	06/06/18 10:00	06/16/18 09:20
40170981002	**NSG PETERSON RD #2**	Non Aqueous	06/06/18 10:05	06/16/18 09:20
40170981003	**NSG PETERSON RD #3**	Non Aqueous	06/06/18 10:10	06/16/18 09:20

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(920)469-2436

SAMPLE ANALYTE COUNT

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
40170981001	**NSG PETERSON RD #1**	EPA 8082A	SNG	12	PASI-M
40170981002	**NSG PETERSON RD #2**	EPA 8082A	SNG	12	PASI-M
40170981003	**NSG PETERSON RD #3**	EPA 8082A	SNG	12	PASI-M

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

Sample: NSG PETERSON RD #1 **Lab ID: 40170981001** Collected: 06/06/18 10:00 Received: 06/16/18 09:20 Matrix: Non Aqueous Liquid

Results reported on a "wet-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082A GCS PCB Oil	Analytical Method: EPA 8082A Preparation Method: EPA 3580								
PCB-1016 (Aroclor 1016)	**<1980**	ug/kg	6590	1980	1	06/20/18 08:49	06/21/18 09:50	12674-11-2	
PCB-1221 (Aroclor 1221)	**<1820**	ug/kg	6060	1820	1	06/20/18 08:49	06/21/18 09:50	11104-28-2	
PCB-1232 (Aroclor 1232)	**<1760**	ug/kg	5860	1760	1	06/20/18 08:49	06/21/18 09:50	11141-16-5	
PCB-1242 (Aroclor 1242)	**<2030**	ug/kg	6760	2030	1	06/20/18 08:49	06/21/18 09:50	53469-21-9	
PCB-1248 (Aroclor 1248)	**<2850**	ug/kg	9490	2850	1	06/20/18 08:49	06/21/18 09:50	12672-29-6	
PCB-1254 (Aroclor 1254)	**<2850**	ug/kg	9490	2850	1	06/20/18 08:49	06/21/18 09:50	11097-69-1	
PCB-1260 (Aroclor 1260)	**<2120**	ug/kg	7060	2120	1	06/20/18 08:49	06/21/18 09:50	11096-82-5	
PCB-1262 (Aroclor 1262)	**<2580**	ug/kg	8590	2580	1	06/20/18 08:49	06/21/18 09:50	37324-23-5	
PCB-1268 (Aroclor 1268)	**<1960**	ug/kg	6530	1960	1	06/20/18 08:49	06/21/18 09:50	11100-14-4	
PCB, Total	**<1760**	ug/kg	5860	1760	1	06/20/18 08:49	06/21/18 09:50	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	97	%.	75-127		1	06/20/18 08:49	06/21/18 09:50	877-09-8	
Decachlorobiphenyl (S)	86	%.	75-134		1	06/20/18 08:49	06/21/18 09:50	2051-24-3	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

Sample: NSG PETERSON RD #2 **Lab ID: 40170981002** Collected: 06/06/18 10:05 Received: 06/16/18 09:20 Matrix: Non Aqueous Liquid

Results reported on a "wet-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082A GCS PCB Oil	Analytical Method: EPA 8082A Preparation Method: EPA 3580								
PCB-1016 (Aroclor 1016)	**<1980**	ug/kg	6590	1980	1	06/20/18 08:49	06/21/18 11:22	12674-11-2	
PCB-1221 (Aroclor 1221)	**<1820**	ug/kg	6060	1820	1	06/20/18 08:49	06/21/18 11:22	11104-28-2	
PCB-1232 (Aroclor 1232)	**<1760**	ug/kg	5860	1760	1	06/20/18 08:49	06/21/18 11:22	11141-16-5	
PCB-1242 (Aroclor 1242)	**<2030**	ug/kg	6760	2030	1	06/20/18 08:49	06/21/18 11:22	53469-21-9	
PCB-1248 (Aroclor 1248)	**<2850**	ug/kg	9490	2850	1	06/20/18 08:49	06/21/18 11:22	12672-29-6	
PCB-1254 (Aroclor 1254)	**10700**	ug/kg	9490	2850	1	06/20/18 08:49	06/21/18 11:22	11097-69-1	
PCB-1260 (Aroclor 1260)	**<2120**	ug/kg	7060	2120	1	06/20/18 08:49	06/21/18 11:22	11096-82-5	
PCB-1262 (Aroclor 1262)	**<2580**	ug/kg	8590	2580	1	06/20/18 08:49	06/21/18 11:22	37324-23-5	
PCB-1268 (Aroclor 1268)	**<1960**	ug/kg	6530	1960	1	06/20/18 08:49	06/21/18 11:22	11100-14-4	
PCB, Total	**10700**	ug/kg	5860	1760	1	06/20/18 08:49	06/21/18 11:22	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	93	%.	75-127		1	06/20/18 08:49	06/21/18 11:22	877-09-8	
Decachlorobiphenyl (S)	79	%.	75-134		1	06/20/18 08:49	06/21/18 11:22	2051-24-3	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

Sample: NSG PETERSON RD #3 **Lab ID: 40170981003** Collected: 06/06/18 10:10 Received: 06/16/18 09:20 Matrix: Non Aqueous Liquid

Results reported on a "wet-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082A GCS PCB Oil	Analytical Method: EPA 8082A Preparation Method: EPA 3580								
PCB-1016 (Aroclor 1016)	**<9900**	ug/kg	33000	9900	5	06/20/18 08:49	06/21/18 11:52	12674-11-2	
PCB-1221 (Aroclor 1221)	**<9100**	ug/kg	30300	9100	5	06/20/18 08:49	06/21/18 11:52	11104-28-2	
PCB-1232 (Aroclor 1232)	**<8800**	ug/kg	29300	8800	5	06/20/18 08:49	06/21/18 11:52	11141-16-5	
PCB-1242 (Aroclor 1242)	**<10200**	ug/kg	33800	10200	5	06/20/18 08:49	06/21/18 11:52	53469-21-9	
PCB-1248 (Aroclor 1248)	**<14200**	ug/kg	47500	14200	5	06/20/18 08:49	06/21/18 11:52	12672-29-6	
PCB-1254 (Aroclor 1254)	**116000**	ug/kg	47500	14200	5	06/20/18 08:49	06/21/18 11:52	11097-69-1	
PCB-1260 (Aroclor 1260)	**<10600**	ug/kg	35300	10600	5	06/20/18 08:49	06/21/18 11:52	11096-82-5	
PCB-1262 (Aroclor 1262)	**<12900**	ug/kg	43000	12900	5	06/20/18 08:49	06/21/18 11:52	37324-23-5	
PCB-1268 (Aroclor 1268)	**<9800**	ug/kg	32600	9800	5	06/20/18 08:49	06/21/18 11:52	11100-14-4	
PCB, Total	**116000**	ug/kg	29300	8800	5	06/20/18 08:49	06/21/18 11:52	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	98	%.	75-127		5	06/20/18 08:49	06/21/18 11:52	877-09-8	D3
Decachlorobiphenyl (S)	87	%.	75-134		5	06/20/18 08:49	06/21/18 11:52	2051-24-3	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

QC Batch: 545787 Analysis Method: EPA 8082A
QC Batch Method: EPA 3580 Analysis Description: 8082A GCS PCB Oil
Associated Lab Samples: 40170981001, 40170981002, 40170981003

METHOD BLANK: 2967645 Matrix: Non Aqueous Liquid
Associated Lab Samples: 40170981001, 40170981002, 40170981003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	ug/kg	<1980	6590	06/21/18 08:49	
PCB-1221 (Aroclor 1221)	ug/kg	<1820	6060	06/21/18 08:49	
PCB-1232 (Aroclor 1232)	ug/kg	<1760	5860	06/21/18 08:49	
PCB-1242 (Aroclor 1242)	ug/kg	<2030	6760	06/21/18 08:49	
PCB-1248 (Aroclor 1248)	ug/kg	<2850	9490	06/21/18 08:49	
PCB-1254 (Aroclor 1254)	ug/kg	<2850	9490	06/21/18 08:49	
PCB-1260 (Aroclor 1260)	ug/kg	<2120	7060	06/21/18 08:49	
PCB-1262 (Aroclor 1262)	ug/kg	<2580	8590	06/21/18 08:49	
PCB-1268 (Aroclor 1268)	ug/kg	<1960	6530	06/21/18 08:49	
Decachlorobiphenyl (S)	%.	96	75-134	06/21/18 08:49	
Tetrachloro-m-xylene (S)	%.	106	75-127	06/21/18 08:49	

LABORATORY CONTROL SAMPLE: 2967646

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	ug/kg	100000	92600	93	73-125	
PCB-1260 (Aroclor 1260)	ug/kg	100000	90900	91	75-132	
Decachlorobiphenyl (S)	%.			101	75-134	
Tetrachloro-m-xylene (S)	%.			109	75-127	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2967647 2967648

Parameter	Units	40170981001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
PCB-1016 (Aroclor 1016)	ug/kg	<1980	100000	100000	93100	92700	93	93	48-150	0	30	
PCB-1260 (Aroclor 1260)	ug/kg	<2120	100000	100000	83100	82700	83	83	58-136	0	30	
Decachlorobiphenyl (S)	%.						87	86	75-134			
Tetrachloro-m-xylene (S)	%.						100	100	75-127			

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALIFIERS

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor and percent moisture.

LOQ - Limit of Quantitation adjusted for dilution factor and percent moisture.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-M	Pace Analytical Services - Minneapolis

ANALYTE QUALIFIERS

D3	Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: WE ENERGIES-NSG PETERSON RD
Pace Project No.: 40170981

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40170981001	**NSG PETERSON RD #1**	EPA 3580	545787	EPA 8082A	545902
40170981002	**NSG PETERSON RD #2**	EPA 3580	545787	EPA 8082A	545902
40170981003	**NSG PETERSON RD #3**	EPA 3580	545787	EPA 8082A	545902

SET Environmental, Inc.

mH

40170981

Chain of Custody Record

450 Sumac Road, Wheeling, IL 60090 Ph: 847-537-9221 * Fax: 847-537-9265 www.setenv.com

COC # : 33590

Client: WE Energies - NSG Peterson Rd

Address: 333 W. Everette St.
Milwaukee WI, 53203

Phone #: Fax #:

P.O. #: Proj #:

Client Contact: Andi Gregg

Sampler: Robert Nimmo

Sample Type:
1. Waste Water 4. Sludge 7. Groundwater (filtered)
2. Drinking Water 5. Oil 8. Other Coolant
3. Soil 6. Groundwater

Container Type:
P-Plastic V-VOC Vial O-Other
G-Glass B-Tedlar Bag

Preservative:
1. None 3. HN03 5. HCl 7. On Ice
2. H2SO4 4. NaOH 6. MeOH 8. Other

Sample I.D. / Drum Numbers	Sample Type	Container Size	Container Type	Container No.	Sampling pH	Sampling Temp	Sampling Date	Sampling Time	Preservation Field	Preservation Lab	Analyses: PCB's w/ Includ. 1262
001 NSG ~~Waukegan~~ Peterson Rd #1 6/6/18	5	1 gal	G	1	-	-	6/6/18	10:00	-	-	X
002 NSG Peterson Rd #2 6/6/18	5	1 gal	G	1	-	-	6/6/18	10:05	-	-	X
003 NSG Peterson Rd #3 6/6/18	8	1 gal	G	1	-	-	6/6/18	10:10	-	-	X

Relinquished By:	Date: 6/13/18 Time: 12:00	Received By: Kathy Arnold	Date: 6/15/18 Time: 11:15
Relinquished By: Kathy Arnold	Date: 6/15/18 Time: 17:00	Received By: CS Logistics	Date: 6/15/18 Time:
Relinquished By: CS Logistics	Date: 6/16/18 Time: 09:20	Received By: Paul Page	Date: 6/16/18 Time: 09:20

Notes/Waste Generated:

SPECIAL INSTRUCTIONS:

Turnaround Time:
- ☐ **Rush** (circle one) **1 2** or **3** day TAT
- ☒ **Routine** (5-10 days)

Due Date: ____-____-____

SET Contact: Robert Nimmo

Lab: Pace

Received On Ice: Yes ☑ No ☐

Temperature: 1 °C

Rev. May 2007

Pace Analytical Services, LLC
1241 Bellevue Street, Suite 9
Green Bay, WI 54302

Sample Preservation Receipt Form

Client Name: We energies Project # 40170981

All containers needing preservation have been checked and noted below: □Yes □No ☑N/A

Lab Lot# of pH paper: Lab Std #ID of preservation (if pH adjusted): Initial when completed: Date/ Time:

Pace Lab #	Glass							Plastic							Vials						Jars			General			VOA Vials (>6mm) *	H2SO4 pH ≤2	NaOH+Zn Act pH ≥9	NaOH pH ≥12	HNO3 pH ≤2	pH after adjusted	Volume (mL)
	AG1U	AG1H	AG4S	AG4U	AG5U	AG2S	BG3U	BP1U	BP2N	BP2Z	BP3U	BP3C	BP3N	BP3S	DG9A	DG9T	VG9U	VG9H	VG9M	VG9D	JGFU	WGFU	WPFU	SP5T	ZPLC	GN						
001																										1						2.5 / 5 / 10
002																										1						2.5 / 5 / 10
003																										1						2.5 / 5 / 10
004																																2.5 / 5 / 10
005																																2.5 / 5 / 10
006																																2.5 / 5 / 10
007																																2.5 / 5 / 10
008																																2.5 / 5 / 10
009																																2.5 / 5 / 10
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014																																2.5 / 5 / 10
015																																2.5 / 5 / 10
016																																2.5 / 5 / 10
017																																2.5 / 5 / 10
018																																2.5 / 5 / 10
019																																2.5 / 5 / 10
020																																2.5 / 5 / 10

Exceptions to preservation check: VOA, Coliform, TOC, TOX, TOH, O&G, WI DRO, Phenolics, Other: _____ Headspace in VOA Vials (>6mm) : □Yes □No ☑N/A ***If yes look in headspace column**

AG1U	1 liter amber glass	BP1U	1 liter plastic unpres	DG9A	40 mL amber ascorbic	JGFU	4 oz amber jar unpres
AG1H	1 liter amber glass HCL	BP2N	500 mL plastic HNO3	DG9T	40 mL amber Na Thio	WGFU	4 oz clear jar unpres
AG4S	125 mL amber glass H2SO4	BP2Z	500 mL plastic NaOH, Znact	VG9U	40 mL clear vial unpres	WPFU	4 oz plastic jar unpres
AG4U	120 mL amber glass unpres	BP3U	250 mL plastic unpres	VG9H	40 mL clear vial HCL		
AG5U	100 mL amber glass unpres	BP3C	250 mL plastic NaOH	VG9M	40 mL clear vial MeOH	SP5T	120 mL plastic Na Thiosulfate
AG2S	500 mL amber glass H2SO4	BP3N	250 mL plastic HNO3	VG9D	40 mL clear vial DI	ZPLC	ziploc bag
BG3U	250 mL clear glass unpres	BP3S	250 mL plastic H2SO4			GN:	4oz ag unpres jar

Pace Analytical 1241 Bellevue Street, Green Bay, WI 54302	Document Name: **Sample Condition Upon Receipt (SCUR)**	Document Revised: 25Apr2018
	Document No.: **F-GB-C-031-Rev.07**	Issuing Authority: Pace Green Bay Quality Office

Sample Condition Upon Receipt Form (SCUR)

Project #:

WO# : 40170981

40170981

Client Name: We energies

Courier: ☑ CS Logistics ☐ Fed Ex ☐ Speedee ☐ UPS ☐ Waltco ☐ Client ☐ Pace Other: _____

Tracking #: _____

Custody Seal on Cooler/Box Present: ☐ yes ☑ no Seals intact: ☐ yes ☐ no

Custody Seal on Samples Present: ☐ yes ☑ no Seals intact: ☐ yes ☐ no

Packing Material: ☐ Bubble Wrap ☑ Bubble Bags ☐ None ☐ Other

Thermometer Used SR - 76 **Type of Ice:** Wet Blue Dry None ☑ Samples on ice, cooling process has begun

Cooler Temperature Uncorr: 2.5 /Corr:)

Temp Blank Present: ☐ yes ☑ no **Biological Tissue is Frozen:** ☐ yes ☐ no

Temp should be above freezing to 6°C.
Biota Samples may be received at ≤ 0°C.

Person examining contents:
Date: 6/16/18
Initials: _____

Chain of Custody Present:	☑Yes ☐No ☐N/A	1.
Chain of Custody Filled Out:	☑Yes ☐No ☐N/A	2.
Chain of Custody Relinquished:	☑Yes ☐No ☐N/A	3.
Sampler Name & Signature on COC:	☐Yes ☑No ☐N/A	4.
Samples Arrived within Hold Time:	☑Yes ☐No	5.
- VOA Samples frozen upon receipt	☐Yes ☐No	Date/Time:
Short Hold Time Analysis (<72hr):	☐Yes ☑No	6.
Rush Turn Around Time Requested:	☐Yes ☑No	7.
Sufficient Volume: For Analysis: ☑Yes ☐No MS/MSD: ☐Yes ☑No ☐N/A		8.
Correct Containers Used:	☑Yes ☐No	9.
-Pace Containers Used:	☑Yes ☐No ☐N/A	
-Pace IR Containers Used:	☐Yes ☐No ☑N/A	
Containers Intact:	☑Yes ☐No	10.
Filtered volume received for Dissolved tests	☐Yes ☐No ☑N/A	11.
Sample Labels match COC:	☑Yes ☐No ☐N/A	12. no collect times 6/16/18
-Includes date/time/ID/Analysis Matrix: 6/16/18 SOIL		
Trip Blank Present:	☐Yes ☐No ☑N/A	13.
Trip Blank Custody Seals Present	☐Yes ☐No ☑N/A	
Pace Trip Blank Lot # (if purchased): _____		

Client Notification/ Resolution: If checked, see attached form for additional comments ☐

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: Samples will be placed in freeze product fridge 6/16/18

Project Manager Review: _____ **Date:** 6/18/18

Attachment B

Pace Project No. 40173016 Analytical Results

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

July 30, 2018

Andi Gregg
WEC Energy Group
333 W. Everett St.
Milwaukee, WI 53203

RE: Project: PETERSON RD
Pace Project No.: 40173016

Dear Andi Gregg:
Enclosed are the analytical results for sample(s) received by the laboratory on July 25, 2018. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Laurie Woelfel

Laurie Woelfel
laurie.woelfel@pacelabs.com
(920)469-2436
Project Manager

Enclosures

cc: Bob Nimmo, SET Environmental

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

CERTIFICATIONS

Project: PETERSON RD
Pace Project No.: 40173016

Minnesota Certification IDs

1700 Elm Street SE, Minneapolis, MN 55414-2485
A2LA Certification #: 2926.01
Alabama Certification #: 40770
Alaska Contaminated Sites Certification #: 17-009
Alaska DW Certification #: MN00064
Arizona Certification #: AZ0014
Arkansas DW Certification #: MN00064
Arkansas WW Certification #: 88-0680
California Certification #: 2929
CNMI Saipan Certification #: MP0003
Colorado Certification #: MN00064
Connecticut Certification #: PH-0256
EPA Region 8+Wyoming DW Certification #: via MN 027-053-137
Florida Certification #: E87605
Georgia Certification #: 959
Guam EPA Certification #: MN00064
Hawaii Certification #: MN00064
Idaho Certification #: MN00064
Illinois Certification #: 200011
Indiana Certification #: C-MN-01
Iowa Certification #: 368
Kansas Certification #: E-10167
Kentucky DW Certification #: 90062
Kentucky WW Certification #: 90062
Louisiana DEQ Certification #: 03086
Louisiana DW Certification #: MN00064
Maine Certification #: MN00064
Maryland Certification #: 322
Massachusetts Certification #: M-MN064
Michigan Certification #: 9909
Minnesota Certification #: 027-053-137
Minnesota Dept of Ag Certifcation #: via MN 027-053-137
Minnesota Petrofund Certification #: 1240
Mississippi Certification #: MN00064
Montana Certification #: CERT0092
Nebraska Certification #: NE-OS-18-06
Nevada Certification #: MN00064
New Hampshire Certification #: 2081
New Jersey Certification #: MN002
New York Certification #: 11647
North Carolina DW Certification #: 27700
North Carolina WW Certification #: 530
North Dakota Certification #: R-036
Ohio DW Certification #: 41244
Ohio VAP Certification #: CL101
Oklahoma Certification #: 9507
Oregon NwTPH Certification #: MN300001
Oregon Secondary Certification #: MN200001
Pennsylvania Certification #: 68-00563
Puerto Rico Certification #: MN00064
South Carolina Certification #:74003001
Tennessee Certification #: TN02818
Texas Certification #: T104704192
Utah Certification #: MN00064
Virginia Certification #: 460163
Washington Certification #: C486
West Virginia DW Certification #: 9952 C
West Virginia DEP Certification #: 382
Wisconsin Certification #: 999407970
Wyoming UST Certification #: via A2LA 2926.01

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

SAMPLE SUMMARY

Project: PETERSON RD
Pace Project No.: 40173016

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40173016001	**PETERSON RD OIL #5 7/19/18**	Non Aqueous	07/19/18 10:00	07/25/18 09:50

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

SAMPLE ANALYTE COUNT

Project: PETERSON RD
Pace Project No.: 40173016

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
40173016001	**PETERSON RD OIL #5 7/19/18**	EPA 8082A	RAG	12	PASI-M

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: PETERSON RD
Pace Project No.: 40173016

Sample: PETERSON RD OIL #5 7/19/18 **Lab ID: 40173016001** Collected: 07/19/18 10:00 Received: 07/25/18 09:50 Matrix: Non Aqueous Liquid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082A GCS PCB Oil	Analytical Method: EPA 8082A Preparation Method: EPA 3580								
PCB-1016 (Aroclor 1016)	**<1980**	ug/kg	6590	1980	1	07/27/18 10:19	07/27/18 17:56	12674-11-2	
PCB-1221 (Aroclor 1221)	**<1820**	ug/kg	6060	1820	1	07/27/18 10:19	07/27/18 17:56	11104-28-2	
PCB-1232 (Aroclor 1232)	**<1760**	ug/kg	5860	1760	1	07/27/18 10:19	07/27/18 17:56	11141-16-5	
PCB-1242 (Aroclor 1242)	**<2030**	ug/kg	6760	2030	1	07/27/18 10:19	07/27/18 17:56	53469-21-9	
PCB-1248 (Aroclor 1248)	**<2850**	ug/kg	9490	2850	1	07/27/18 10:19	07/27/18 17:56	12672-29-6	
PCB-1254 (Aroclor 1254)	**<2850**	ug/kg	9490	2850	1	07/27/18 10:19	07/27/18 17:56	11097-69-1	
PCB-1260 (Aroclor 1260)	**<2120**	ug/kg	7060	2120	1	07/27/18 10:19	07/27/18 17:56	11096-82-5	
PCB-1262 (Aroclor 1262)	**<2580**	ug/kg	8590	2580	1	07/27/18 10:19	07/27/18 17:56	37324-23-5	
PCB-1268 (Aroclor 1268)	**<1960**	ug/kg	6530	1960	1	07/27/18 10:19	07/27/18 17:56	11100-14-4	
PCB, Total	**<1760**	ug/kg	5860	1760	1	07/27/18 10:19	07/27/18 17:56	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	91	%.	75-127		1	07/27/18 10:19	07/27/18 17:56	877-09-8	
Decachlorobiphenyl (S)	82	%.	75-134		1	07/27/18 10:19	07/27/18 17:56	2051-24-3	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: PETERSON RD
Pace Project No.: 40173016

QC Batch: 553109
QC Batch Method: EPA 3580
Analysis Method: EPA 8082A
Analysis Description: 8082A GCS PCB Oil
Associated Lab Samples: 40173016001

METHOD BLANK: 3004950
Matrix: Non Aqueous Liquid
Associated Lab Samples: 40173016001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	ug/kg	<1980	6590	07/27/18 16:55	
PCB-1221 (Aroclor 1221)	ug/kg	<1820	6060	07/27/18 16:55	
PCB-1232 (Aroclor 1232)	ug/kg	<1760	5860	07/27/18 16:55	
PCB-1242 (Aroclor 1242)	ug/kg	<2030	6760	07/27/18 16:55	
PCB-1248 (Aroclor 1248)	ug/kg	<2850	9490	07/27/18 16:55	
PCB-1254 (Aroclor 1254)	ug/kg	<2850	9490	07/27/18 16:55	
PCB-1260 (Aroclor 1260)	ug/kg	<2120	7060	07/27/18 16:55	
PCB-1262 (Aroclor 1262)	ug/kg	<2580	8590	07/27/18 16:55	
PCB-1268 (Aroclor 1268)	ug/kg	<1960	6530	07/27/18 16:55	
Decachlorobiphenyl (S)	%.	92	75-134	07/27/18 16:55	
Tetrachloro-m-xylene (S)	%.	97	75-127	07/27/18 16:55	

LABORATORY CONTROL SAMPLE: 3004951

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	ug/kg	100000	87000	87	73-125	
PCB-1260 (Aroclor 1260)	ug/kg	100000	84300	84	75-132	
Decachlorobiphenyl (S)	%.			97	75-134	
Tetrachloro-m-xylene (S)	%.			102	75-127	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3004952 3004953

Parameter	Units	40173016001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
PCB-1016 (Aroclor 1016)	ug/kg	<1980	100000	100000	97600	97200	98	97	48-150	0	30	
PCB-1260 (Aroclor 1260)	ug/kg	<2120	100000	100000	79000	81500	79	82	58-136	3	30	
Decachlorobiphenyl (S)	%.						81	82	75-134			
Tetrachloro-m-xylene (S)	%.						97	95	75-127			

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALIFIERS

Project: PETERSON RD
Pace Project No.: 40173016

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor and percent moisture.

LOQ - Limit of Quantitation adjusted for dilution factor and percent moisture.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-M Pace Analytical Services - Minneapolis

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: PETERSON RD
Pace Project No.: 40173016

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40173016001	**PETERSON RD OIL #5 7/19/18**	EPA 3580	553109	EPA 8082A	553227

SET Environmental, Inc.

SKW

40173016

Chain of Custody Record

450 Sumac Road, Wheeling, IL 60090 Ph: 847-537-9221 * Fax: 847-537-9265 www.setenv.com

COC # : 33703

Client: We Energies - PGL Peterson Rd
Address: 333 W. Everett - A23
Milwaukee, WI 53203
Phone #: Fax #:
P.O. #: Proj #:
Client Contact: Andi Gregg / Robert Nimmo
Sampler: Robert Nimmo

Sample Type:
1. Waste Water 4. Sludge 7. Groundwater (filtered)
2. Drinking Water 5. Oil 8. Other
3. Soil 6. Groundwater

Container Type:
P-Plastic V-VOC Vial O-Other
G-Glass B-Tedlar Bag

Preservative:
1. None 3. HN03 5. HCl 7. On Ice
2. H2SO4 4. NaOH 6. MeOH 8. Other

Sample I.D. / Drum Numbers	Sample Type	Container Size	Container Type	Container No.	Sampling pH	Sampling Temp	Sampling Date	Sampling Time	Preservation Field	Preservation Lab	Analyses: PCB including 1262									
Peterson Rd oil #5 7/19/18	5	1 liter	G	1	-	-	7/19	10:30	-	-	X					001				

Relinquished By:	Date: 7/20/18 Time: 12:00	Received By: Kathy Wendel	Date: 7/24/18 Time: 10:50
Relinquished By: Kathy Wendel	Date: 7/24/18 Time: 17:00	Received By: CS Logistics	Date: 7/24/18 Time: :
Relinquished By: CS Logistics	Date: 7/25/18 Time: 09:50	Received By:	Date: 7/25/18 Time: 09:50

Notes/Waste Generated:

SPECIAL INSTRUCTIONS:

Turnaround Time:
☐ **Rush** (circle one)
1 **2** or **3** day TAT
☒ **Routine** (5-10 days)
Due Date: 8-1-18

SET Contact: Robert Nimmo

Lab: Pace

Received On Ice: Yes ☒ No ☐

Temperature: 0.5 °C

Rev. May 2007

Pace Analytical Services, LLC
1241 Bellevue Street, Suite 9
Green Bay, WI 54302

Sample Preservation Receipt Form

Client Name: SET Project # 40173016

All containers needing preservation have been checked and noted below: □Yes □No ☒N/A Initial when completed: Date/ Time:

Lab Lot# of pH paper: Lab Std #ID of preservation (if pH adjusted):

Pace Lab #	Glass							Plastic							Vials						Jars			General			VOA Vials (>6mm) *	H2SO4 pH ≤2	NaOH+Zn Act pH ≥9	NaOH pH ≥12	HNO3 pH ≤2	pH after adjusted	Volume (mL)
	AG1U	AG1H	AG4S	AG4U	AG5U	AG2S	BG3U	BP1U	BP2N	BP2Z	BP3U	BP3C	BP3N	BP3S	DG9A	DG9T	VG9U	VG9H	VG9M	VG9D	JGFU	WGFU	WPFU	SP5T	ZPLC	GN						
001																										1						2.5 / 5 / 10
002																																2.5 / 5 / 10
003																																2.5 / 5 / 10
004																																2.5 / 5 / 10
005																																2.5 / 5 / 10
006																																2.5 / 5 / 10
007																																2.5 / 5 / 10
008																																2.5 / 5 / 10
009																																2.5 / 5 / 10
010																																2.5 / 5 / 10
011																																2.5 / 5 / 10
012																																2.5 / 5 / 10
013																																2.5 / 5 / 10
014																																2.5 / 5 / 10
015																																2.5 / 5 / 10
016																																2.5 / 5 / 10
017																																2.5 / 5 / 10
018																																2.5 / 5 / 10
019																																2.5 / 5 / 10
020																																2.5 / 5 / 10

Exceptions to preservation check: VOA, Coliform, TOC, TOX, TOH, O&G, WI DRO, Phenolics, Other: _____ Headspace in VOA Vials (>6mm) : □Yes □No ☒N/A ***If yes look in headspace column**

AG1U	1 liter amber glass	BP1U	1 liter plastic unpres	DG9A	40 mL amber ascorbic	JGFU	4 oz amber jar unpres
AG1H	1 liter amber glass HCL	BP2N	500 mL plastic HNO3	DG9T	40 mL amber Na Thio	WGFU	4 oz clear jar unpres
AG4S	125 mL amber glass H2SO4	BP2Z	500 mL plastic NaOH, Znact	VG9U	40 mL clear vial unpres	WPFU	4 oz plastic jar unpres
AG4U	120 mL amber glass unpres	BP3U	250 mL plastic unpres	VG9H	40 mL clear vial HCL		
AG5U	100 mL amber glass unpres	BP3C	250 mL plastic NaOH	VG9M	40 mL clear vial MeOH	SP5T	120 mL plastic Na Thiosulfate
AG2S	500 mL amber glass H2SO4	BP3N	250 mL plastic HNO3	VG9D	40 mL clear vial DI	ZPLC	ziploc bag
BG3U	250 mL clear glass unpres	BP3S	250 mL plastic H2SO4			GN:	1 liter clear glass unpreserved

Pace Analytical 1241 Bellevue Street, Green Bay, WI 54302	Document Name: **Sample Condition Upon Receipt (SCUR)**	Document Revised: 25Apr2018
	Document No.: **F-GB-C-031-Rev.07**	Issuing Authority: Pace Green Bay Quality Office

Sample Condition Upon Receipt Form (SCUR)

Project #: **WO# : 40173016**

Client Name: SET

Courier: ☒ CS Logistics ☐ Fed Ex ☐ Speedee ☐ UPS ☐ Waltco
☐ Client ☐ Pace Other: _____

Tracking #: _____

Custody Seal on Cooler/Box Present: ☒ yes ☐ no Seals intact: ☒ yes ☐ no

Custody Seal on Samples Present: ☐ yes ☒ no Seals intact: ☐ yes ☐ no

Packing Material: ☐ Bubble Wrap ☒ Bubble Bags ☐ None ☐ Other _____

Thermometer Used SR - 50 **Type of Ice:** (Wet) Blue Dry None ☒ Samples on ice, cooling process has begun

Cooler Temperature Uncorr: 0 /Corr: 0.5

Temp Blank Present: ☒ yes ☐ no **Biological Tissue is Frozen:** ☐ yes ☐ no

Temp should be above freezing to 6°C.
Biota Samples may be received at ≤ 0°C.

Person examining contents:
Date: 7/25/18
Initials: TL

Chain of Custody Present:	☒Yes ☐No ☐N/A	1. orginal copy 7/25/18 TL
Chain of Custody Filled Out:	☒Yes ☐No ☐N/A	2.
Chain of Custody Relinquished:	☒Yes ☐No ☐N/A	3.
Sampler Name & Signature on COC:	☐Yes ☒No ☐N/A	4.
Samples Arrived within Hold Time:	☒Yes ☐No	5.
- VOA Samples frozen upon receipt	☐Yes ☐No	Date/Time:
Short Hold Time Analysis (<72hr):	☐Yes ☒No	6.
Rush Turn Around Time Requested:	☐Yes ☒No	7.
Sufficient Volume:		8.
For Analysis: ☒Yes ☐No MS/MSD:	☐Yes ☒No ☐N/A	
Correct Containers Used:	☒Yes ☐No	9.
-Pace Containers Used:	☒Yes ☐No ☐N/A	
-Pace IR Containers Used:	☐Yes ☐No ☒N/A	
Containers Intact:	☒Yes ☐No	10.
Filtered volume received for Dissolved tests	☐Yes ☐No ☒N/A	11.
Sample Labels match COC:	☐Yes ☒No ☐N/A	12. no time
-Includes date/time/ID/Analysis Matrix: DW		7/25/18 TL
Trip Blank Present:	☐Yes ☐No ☒N/A	13.
Trip Blank Custody Seals Present	☐Yes ☐No ☒N/A	
Pace Trip Blank Lot # (if purchased): _____		

Client Notification/ Resolution: If checked, see attached form for additional comments ☐

Person Contacted: _____ Date/Time: _____

Comments/ Resolution:
no Sample will be located in free product fridge 7/25/18 TL
7/25/18 TL

Project Manager Review: _____ **Date:** 7/25/18

Attachment C

SET Profile Number 134458

SET PROFILE 134458

As of 8/7/2018 12:17:02

SET Number: **134458** Name: **Oily water/Antifreeze, non-TSCA PCB**

Date Approved:

Contact Id: **Erik Ehrengren**
(414) 221-4778

Broker: **SET Env - Wheeling, IL**
450 Sumac Rd
Wheeling, IL 60090-

Sales Rep: **Bob Nimmo**
Cust Svc Rep: **Danielle Weiss**

DOT Ship Name	**Non-DOT/RCRA Regulated**
UN/NA:	
Hazard Class:	Packing Group:
Rq: ☐	RQ Value:

Qty containers: **2**

Frequency: **Once**

Process Desc: **Spent/used Draining of fluids from generator and cleaning of unit**

TSDF: **SET Environmental, Inc.**
Address: **5738 Cheswood Street, Houston, TX**
US EPA ID: **TXD055135388**

Generators' Sites

Name	US EPA Id	St.Waste Cd	Site Address	TSDF	Off Site Profile#
North Shore Gas Company	ILR000067751	OUTS2051	2101 W. Peterson Rd., North Shore Gas, Libertyville, IL 60048	T1	

	Waste Composition	CAS #	% Average	% Low	% High
3	Water		95.0	50	95
2	Antifreeze		50.0	50	100
1	Oil		5.0	1	5
4	PCB <50ppm		0.0	0	0

Characteristic	Typical Value	LO Val	HI Val	UOM
COLOR	Varied			
LAYER	Homogenous			
ODOR	Mild			
PHYST	Liquid			
SOLID	0.0	0.0	5.0	%
FLASH	-			
OXIDIZ	-			
PH	7.0	4.0	10.0	pH
SPGRAV	1.000	0.900	1.100	

SET PROFILE 134458

As of 8/7/2018 12:17:02

1. Is the hazardous waste determination based on the generator's detailed knowledge of the waste?	No
2. Is the hazardous waste determination based on the analysis of the waste? If yes, please attach analysis.	Yes
3. Does this waste meet the definition of debris in 40 CFR 268.2(g)?	No
4. Does this waste meet the definition of Univeral Waste in 40 CFR part 273?	No
5. If this is a characteristically hazardous waste (i.e., D-Coded), does it contain any underlying hazardous constituents as defined in 40 CFR 268.2(i)? If yes, identify each constituent and their percentages in Waste Composition.	No
6. Does this waste contain any of the EPCRA 313 chemicals identified in 40 CFR 372.65? If yes, list these chemicals, CAS # and their percentages in Waste Composition.	No
7. Does this waste contain any of the EHS identified in section 302 of EPCRA? If yes, list these chemicals, CAS # and their percentages in Waste Composition.	No
8. Is this waste regulated under the National Emissions Standard for Benzene Waste Operations (40 CFR Part 61 Subpart FF)?	No
9. Does this waste meet the definition of a wastewater (40 CFR 268.2(f))?	No
10. Is this waste being shipped in DOT specification packages authorized for the material they contain?	Yes
11. Is the total organic halogen (TOH) content of this used oil >= 1,000 ppm? If the answer is "Yes", this material will be considered a hazardous waste unless sufficient documentation is provided to rebut the presumption that the used oil is a hazardous waste (see 40 CFR §279.44).	N/A

I hereby certify that the information identified above and attached to this profile is complete and accurate to the best of my knowledge and ability to determine that no omissions of composition or properties exist, and that all known or suspected hazards have been disclosed. I also understand it is my responsibility to properly identify and classify my waste in accordance with USEPA, US DOT and State regulations.

Anndelee Gregg
PRINTED NAME

SIGNATURE

Sr. Environmental Consultant
TITLE

August 20, 2018
DATE

Attachment D

Uniform Hazardous Waste Number 017176269 JJK

VIII

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
ILR000067751	1	877-437-7455	017176269 JJK

GENERATOR

5. Generator's Name and Mailing Address
North Shore Gas Company
2101 W. Peterson Rd. North Shore Gas
Libertyville, IL 60048
Generator's Phone: 312-946-6817

Generator's Site Address (if different than mailing address)
2101 W. Peterson Rd.
North Shore Gas
Libertyville, IL 60048

6. Transporter 1 Company Name: SET Environmental, Inc.
U.S. EPA ID Number: ILD981957236

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
SET Environmental, Inc.
5743 Cheswood
Houston, TX 77087
Facility's Phone: (713) 645-8710
U.S. EPA ID Number: TXD055135388

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. Non-DOT/RCRA Regulated	01	dm	55	G	OUTS2051
	2. Non-DOT/RCRA Regulated	01	df	55	G	OUTS2051
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1=134458:Oily water/Antifreeze, non-TSCA PCB 1X55 2=134458:Oily water/Antifreeze, Non TSCA PCB 1X55 1808 0393

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Louis Monticello
Signature:
Month 08 Day 17 Year 18

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Eric Camafeo
Signature: Eric Camafeo
Month 08 Day 17 Year 18

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141	H141		

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Andrea Coleman
Signature: Andrea Coleman
Month 08 Day 22 Year 18

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Attachment E

Uniform Hazardous Waste Number 019420893 JJK

WO 136222

Please print or type. Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: TXD055135388
2. Page 1 of: 4
3. Emergency Response Phone: 832-418-3636
4. Manifest Tracking Number: 019420893 JJK

GENERATOR

5. Generator's Name and Mailing Address
SET Environmental, Inc.
5738 Cheswood Street
Houston, TX 77087
Generator's Phone: 713-645-8710

Generator's Site Address (if different than mailing address)
5743 Cheswood Street
Houston, TX 77087

6. Transporter 1 Company Name: SET Environmental, Inc.
U.S. EPA ID Number: ILD981957236

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
US Ecology Texas
3277 County Road 69
Robstown, TX 78380-0000
Facility's Phone: (800) 242-3209
U.S. EPA ID Number: TXD069452340

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
RQ	1. NA3077 Hazardous waste, solid, n.o.s. 9 PGIII (Dichloromethane)	1	DF	190	P	F002		051019H
RQ	2. UN3219 Waste Nitrites, inorganic, aqueous solution, n.o.s. (Sodium Nitrite, Potassium Nitrite) 5.1 PGIII (D001 D002)	7	DF	3064	P	D002	D001	052119H
RQ	3. UN3219 Waste Nitrites, inorganic, aqueous solution, n.o.s. (Sodium Nitrite, Potassium Nitrite) 5.1 PGIII (D001 D002)	2	DF	1220	P	D002	D001	052119H
RQ	4. UN3219 Waste Nitrites, inorganic, aqueous solution, n.o.s. (Sodium Nitrite, Potassium Nitrite) 5.1 PGIII (D001 D002)	1	TP	1785	P	D002	D001	052119H

14. Special Handling Instructions and Additional Information: LDR attached; certificate of disposal requested
1=090047265-1:DEBRIS, HAZARDOUS [MACRO] 2=09-004-9289:OXIDIZER, LIQUIDS, NITRITES [NO2] 3=09-004-9289:OXIDIZER, LIQUIDS, NITRITES [NO2] 4=09-004-9289:OXIDIZER, LIQUIDS, NITRITES [NO2] JAN#1107

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Damon Gwinn
Signature: Damon Gwinn
Month: 9 Day: 27 Year: 18

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Leo Pedroza
Signature: Leo Pedroza
Month: 9 Day: 28 Year: 18

Transporter 2 Printed/Typed Name:
Signature:
Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Line 2: 3 DS 090058806-0, UN1477, Nitrates Inorganic N.O.S. 5.1, SWC TSDF319H, D001, per Jay Sturges 10/3/18 HK
Line 4: 1 DS 090060344-0, UN3098, Oxidizing Liquid, Corrosive, NOS, SWC, TSDF110H Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H110 H132	H110 H141	H110 H141	H110 H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Richard Hayes
Signature:
Month: 9 Day: 28 Year: 18

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

UC 32138
WO 1362222

Please print or type. Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number: TXD055135388

22. Page: 2 of 4

23. Manifest Tracking Number: 019420893JJK

24. Generator's Name: SET Environmental, Inc.
5738 Cheswood Street
Houston, TX 77087- 713-645-8710 50267

25. Transporter _____ Company Name — U.S. EPA ID Number

26. Transporter _____ Company Name — U.S. EPA ID Number

GENERATOR

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
RQ	5 UN3266: Waste Corrosive liquid, basic, inorganic, n.o.s. (Sodium Hydroxide) 8 PG:III (D002)	1	DF	360	P	D002		0535106H
RQ	6 UN3266: Waste Corrosive liquid, basic, inorganic, n.o.s. (Sodium Hydroxide) 8 PG:III (D002)	1	TP	1660	P	D002		0535106H
X	7 UN3266: Waste Corrosive liquid, basic, inorganic, n.o.s. (4-(n-ethyl-n-2-methane sulfonyl aminoethyl)-2-methyl phenyl 8 PG:III (D002)	2	DF	321	P	D002		TSDF110H
RQ	8 UN2922: Waste Corrosive liquids, toxic, n.o.s. (Hydrofluoric Acid, Ammonium Bifluoride) 8 (6.1) PG:II (D002)	4	DF	1884	P	D002		0536103H
X	9 UN1830: Waste Sulfuric acid 8 PG:II (D002)	1	TP	1277	P	D002		TSDF103H
	10 Non-Regulated Material	1	DF	50	P			05073191
X	11 NA2212: Asbestos 9 PG:III	3	DM	861	P			05283111
	12 Non Regulated Material	7	DF	322	P			05316091
	13 Non Regulated Material	6	DM	2489	P			05316091
	14 Non Regulated Material	4	TP	8124	P			05316091

32. Special Handling Instructions and Additional Information

09-005-3569 DF

5=090052566:BASES, UNLISTED [VAT] 6=090052566:BASES, UNLISTED [VAT] 7=09-007-3191:BASES, DEVELOPER-H 8=09-008-2167;SST Waste 9=09-008-9710:ACIDS, SULFURIC, CONCENTRATED 93% 10=090049025:NON-HAZ - COMMPK [NH PACK] 11=09-004-0086:ASBESTOS [ASBESTOS] 12=090042153-1:NON-HAZ, LIQUIDS / SLUDGES 13=090042153-1:NON-HAZ, LIQUIDS / SLUDGES 14=090042153-1:NON-HAZ, LIQUIDS / SLUDGES

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

H121 H132 H100 H132	H121 H132 H132 H132	H121 H132 H110 H132	H110 H132 H110 H132	H121 H132 H110 H132

EPA Form 8700-22A (Rev. 12-17) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

UC 32138
WC 136222

Please print or type. Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number	22. Page	23. Manifest Tracking Number
	TXD055135388	3 of 4	019420893JJK

24. Generator's Name: SET Environmental, Inc.
5738 Cheswood Street
Houston, TX 77087- 713-645-8710 50267

25. Transporter _____ Company Name — U.S. EPA ID Number

26. Transporter _____ Company Name — U.S. EPA ID Number

GENERATOR

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
	15 Not Regulated (MDI)	1	DM	68	P	05316091
	16 Not Regulated (MDI)	1	DF	56	P	05316091
	17 Non Regulated Solids	3	DF	1098	P	05073191
	18 Non Regulated Solids	14	DM	3546	P	05073191
	19 Non Regulated Solids	2	DF	150	P	05073191
	20 Non Regulated Solids	2	DF	130	P	05073191
	21 Non Regulated Solids	1	CF	480	P	05073191
X	22 UN3262: Corrosive solid, basic, inorganic, n.o.s. (Sodium Hydroxide) 8 PG:III	4	DF	760	P	05073191
X	23 UN3262: Corrosive solid, basic, inorganic, n.o.s. (Sodium Hydroxide) 8 PG:III	1	CW	480	P	05073191
	24 Non Regulated Material	1	DF	497	P	TSDF1191

32. Special Handling Instructions and Additional Information
15=09-004-6978:NON-HAZ, LIQUIDS, MDI 16=09-004-6978:NON-HAZ, LIQUIDS, MDI 17=090050175-1:NON-HAZ, SOLIDS [COS] 18=090050175-1:NON-HAZ, SOLIDS [COS] 19=090050175-1:NON-HAZ, SOLIDS [COS] 20=090050175-1:NON-HAZ, SOLIDS [COS] 21=090050175-1:NON-HAZ, SOLIDS [COS] 22=090050175-1:NON-HAZ, SOLIDS, BASES 23=090050175-1:NON-HAZ, SOLIDS, BASES 24=090042153-1:N/S: NON-HAZ, LIQUIDS / SLUDGES

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

H100 H130	H100 H130	H132	H132	H132
H132	H132	H132	H132	H100 H132

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number	22. Page	23. Manifest Tracking Number
TXD055135388	4 of 4	019420893 JJK

24. Generator's Name: SET Environmental, Inc.
5738 Cheswood Street
Houston, TX 77087- 713-645-8710 50267

25. Transporter _____ Company Name — U.S. EPA ID Number

26. Transporter _____ Company Name — U.S. EPA ID Number

GENERATOR

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
	25 Non Regulated Material	1	DM	505	P		TSDF1191	

32. Special Handling Instructions and Additional Information
25=090042153-1:N/S: NON-HAZ, LIQUIDS / SLUDGES

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
H100 H170

853498

Please print or type. Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
TXD069452340	1	(800) 839-3975	020115799 JJK

GENERATOR

5. Generator's Name and Mailing Address
US ECOLOGY TEXAS, INC
3277 COUNTY ROAD 69
ROBSTOWN TX 78380
Generator's Phone: (361) 387-3518

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: ACTION RESOURCES INC — U.S. EPA ID Number: ALR000007237

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
VEOLIA
HWY 73, 3.5 MILES WEST OF TAYLOR BAYOU
PORT ARTHUR TX 77640
Facility's Phone: (409) 736-2821
U.S. EPA ID Number: TXD000838896

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3432, WASTE POLYCHLORINATED BIPHENYLS, SOLID, 9, PII 9-2349 TSDF3981	1	CM	~~25483~~ 28660	P JM	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
OF4898 1:565912 Box # RT2153
P-TA565912 OOSD 6-1-18 SEP 23 '19 8:47

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Qiana Myles — Signature — Month 09 Day 13 Year 19

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: TOM MESA — Signature — Month 09 Day 18 Year 19 JM

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H040			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Tesle Carpenter — Signature — Month 9 Day 23 Year 19

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. **DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM**

853574

Please print or type. Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
TXD069452340	1	(800) 839-3975	020115800 JJK

GENERATOR

5. Generator's Name and Mailing Address
US ECOLOGY TEXAS, INC
3277 COUNTY ROAD 69
ROBSTOWN TX 78380
Generator's Phone: (361) 387-3518

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: ACTION RESOURCES INC — U.S. EPA ID Number: ALR000007237

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
VEOLIA
HWY 73, 3.5 MILES WEST OF TAYLOR BAYOU
PORT ARTHUR TX 77640
Facility's Phone: (409) 736-2821

U.S. EPA ID Number: TXD000838896

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3432, WASTE POLYCHLORINATED BIPHENYLS, SOLID, 9, PII TSDF3981	1	CM	~~28000~~ 23640 JAN	P	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
OF4897 1:565912 BOX RT4167
OOSD 6-1-18
Trailer RT4167
SEP 23 '19 8:47

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Qiana Myles — Signature — Month: 09 Day: 13 Year: 19

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Jose A. Nacianceno — Signature — Month: 9 Day: 18 Year: 19

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H040			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Tesla Carpenter — Signature: Tesla Carpenter — Month: 9 Day: 23 Year: 19

RECEIVED APR 2 0 2020

US Ecology Texas, Inc.
P.O. Box 307
3277 County Road 69
Robstown, TX 78380

Phone: (800) 242 3209
(361) 387-3518
Fax: (361) 387 0794
(361) 387-0577

US Ecology Texas, Inc.

a *US Ecology Inc.* company

INVOICE

SET ENVIRONMENTAL
Attn : ACCOUNTS PAYABLES
5738 CHESWOOD ST
HOUSTON, TX 77087--400

Invoice #: TC163951
Invoice date: 04/20/2020
Customer ID: 7566 / 7566
AX Customer ID: C002779
AX Invoice Customer ID: C002779

Please remit checks to:
P O Box 936227
Atlanta, GA 31193-6227

Terms: **30 Days**

Please wire to:
Bank: Wells Fargo Bank, N.A.
ABA: 121000248 **Account #:** 4140909680
Account Name: US Ecology Livonia, Inc.

PO# 213276

Quantity	Unit	DESCRIPTION	Rate	Total
Reference #:				
28448	POUNDS	DISPOSAL OF TRANSFORMER OIL/PCB'S DUG UP FROM USET, MANIFEST 020115799JJK, 9/13/19	$0.9605	$27,324.30
23468	POUNDS	DISPOSAL OF TRANSFORMER OIL/PCB'S DUG UP FROM USET, MANIFEST 020115800JJK, 9/13/19	$0.9605	$22,541.01
2	PER HOUR	ROLL-OFF TRUCK	$95.00	$190.00
4	PER HOUR	DOZER	$150.00	$600.00
16	PER HOUR	EXCAVATOR	$150.00	$2,400.00
1	LOAD	TRANSPORTATION (MANIFEST 020115800JJK)	$1,500.00	$1,500.00
16	PER HOUR	ENVIRONMENTAL SUPERVISOR	$65.00	$1,040.00
1.5	EACH	LANDFILL EXCAVATION ($7,500/10 FT)	$7,500.00	$11,250.00
1	LOAD	TRANSPORTATION (MANIFEST 020115799JJK)	$1,500.00	$1,500.00
1	EACH	FUEL SURCHARGE 22%	$330.00	$330.00
1	EACH	FUEL SURCHARGE 22%	$330.00	$330.00
16	PER HOUR	ENVIRONMENTAL TECH/OPERATOR	$45.00	$720.00
			Total	**$69,725.31**

code per Dawn

RCV'D	APRV'D
GL ACCT#	AMOUNT
01-1L-MUCH-06-4200	69,725.31
OD 2025 / 4200	(
PER	TOTAL 69,725.31

* ok per Michaela Dave

ENTERED APR 2 1 2020

** Minimum quantity/minimum charge applied.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN	**§**	**BEFORE THE**
ENFORCEMENT ACTION	**§**	
CONCERNING	**§**	**TEXAS COMMISSION ON**
SET ENVIRONMENTAL, INC.	**§**	
RN100607126	**§**	**ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2020-0592-IHW-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding SET ENVIRONMENTAL, INC. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 361 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a hazardous waste treatment and disposal facility located at 5738 Cheswood Street in Houston, Harris County, Texas (the "Facility"). The Facility involves or involved the management of industrial and hazardous waste ("IHW") as defined in TEX. HEALTH & SAFETY CODE ch. 361.

2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 361 and the rules of the TCEQ.

3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

4. An administrative penalty in the amount of $15,764 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid $12,612 of the penalty and $3,152 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.

7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.

8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Facility:

   a. Placed new lids on two 55-gallon drums located in container storage area ("CS") 2 and one 55-gallon drum in CS-3 containing hazardous waste with new lids on December 20, 2019;

   b. Provided signage for permitted tank PT-12 and two permitted container storage areas CS-1 and CS-2 on December 20, 2019; and

   c. Disposed of the polychlorinated biphenyl (“PCB”) contaminated waste at an authorized facility on September 23, 2019.

II. ALLEGATIONS

During an investigation conducted on October 8, 2019, an investigator documented that the Respondent:

1. Failed to prevent the receipt and storage of IHW without the required permit and allowed the disposal of IHW at an unauthorized facility, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1), 335.2, and 335.4(3) and Hazardous Waste Permit No. 50267 Permit Provision ("PP") II.A.2, II.A.7, and IV.B.3.a. Specifically, the Facility accepted and stored for 36 days one 55-gallon drum containing 226 kilograms of PCB contaminated waste before shipping it to an unauthorized disposal facility.

2. Failed to ensure that hazardous waste containers remain closed when in storage except when adding or removing waste, in violation of 30 TEX. ADMIN. CODE § 335.152(a)(7) and 40 Code of Federal Regulations § 264.173(a) and Hazardous Waste Permit No. 50267 PP II.A.2, II.C.1.j, and C.2.g. Specifically, two 55-gallon drums located in container storage area CS-2 and one 55-gallon drum in CS-3 were open.

3. Failed to clearly identify authorized storage units with signs indicating "TCEQ Permit Unit No." , in violation of 30 TEX. ADMIN. CODE § 305.125(1) and Hazardous Waste Permit No. 50267 PP II.A.2 and V.A.1. Specifically, permitted tank PT-12 did not have an identifying sign and signs on permitted container storage areas CS-1 and CS-2 were faded and illegible.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: SET ENVIRONMENTAL, INC., Docket No. 2020-0592-IHW-E" to:

   Financial Administration Division, Revenue Operations Section
   Attention: Cashier's Office, MC 214
   Texas Commission on Environmental Quality
   P.O. Box 13088
   Austin, Texas 78711-3088

2. All relief not expressly granted in this Order is denied.

3. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.

4. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

5. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

6. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized,

converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

7. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

_____ _____
For the Commission Date

_____ _____
For the Executive Director Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

_____ _____
Signature Date

_____ _____
Name (Printed or typed) Title
Authorized Representative of
SET ENVIRONMENTAL, INC.

☐ *If mailing address has changed, please check this box and provide the new address below:*

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.

Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014) — *PCW Revision March 26, 2014*

DATES						
	Assigned	20-Apr-2020				
	PCW	23-Apr-2020	**Screening**	22-Apr-2020	**EPA Due**	

RESPONDENT/FACILITY INFORMATION

Respondent	SET ENVIRONMENTAL, INC.		
Reg. Ent. Ref. No.	RN100607126		
Facility/Site Region	12-Houston	**Major/Minor Source**	Major

CASE INFORMATION

Enf./Case ID No.	59252	**No. of Violations**	3
Docket No.	2020-0592-IHW-E	**Order Type**	1660
Media Program(s)	Industrial and Hazardous Waste	**Government/Non-Profit**	No
Multi-Media		**Enf. Coordinator**	Stephanie McCurley
		EC's Team	Enforcement Team 7

Admin. Penalty $ Limit Minimum $0 Maximum $25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) — *Subtotal 1*: **$24,250**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History **-10.0%** Adjustment — *Subtotals 2, 3, & 7*: **-$2,425**

Notes: Reduction for High Performer classification.

Culpability No **0.0%** Enhancement — *Subtotal 4*: **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments — *Subtotal 5*: **-$6,061**

Economic Benefit **0.0%** Enhancement* — *Subtotal 6*: **$0**

Total EB Amounts $3,804
Estimated Cost of Compliance $70,875

**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 — *Final Subtotal*: **$15,764**

OTHER FACTORS AS JUSTICE MAY REQUIRE **0.0%** — *Adjustment*: **$0**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount: **$15,764**

STATUTORY LIMIT ADJUSTMENT — *Final Assessed Penalty*: **$15,764**

DEFERRAL **20.0%** Reduction — *Adjustment*: **-$3,152**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY: **$12,612**

Screening Date 22-Apr-2020 **Docket No.** 2020-0592-IHW-E **PCW**

Respondent SET ENVIRONMENTAL, INC.

Case ID No. 59252

Reg. Ent. Reference No. RN100607126

Media Industrial and Hazardous Waste

Enf. Coordinator Stephanie McCurley

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Compliance History Worksheet

>> Compliance History *Site* Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (*number of NOVs meeting criteria*)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (*number of judgments or consent decrees meeting criteria*)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

High Performer

Adjustment Percentage (Subtotal 7) -10%

>> Compliance History Summary

Compliance History Notes

Reduction for High Performer classification.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) -10%

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** -10%

Screening Date 22-Apr-2020 **Docket No.** 2020-0592-IHW-E **PCW**

Respondent SET ENVIRONMENTAL, INC.

Policy Revision 4 (April 2014)

Case ID No. 59252

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100607126

Media Industrial and Hazardous Waste

Enf. Coordinator Stephanie McCurley

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 305.125(1), 335.2, and 335.4(3) and Hazardous Waste Permit No. 50267 Permit Provision ("PP") II.A.2, II.A.7, and IV.B.3.a

Violation Description Failed to prevent the receipt, storage, and shipment of industrial and hazardous waste ("IHW") without the required permit and allowed disposal of the IHW at an unauthorized facility. Specifically, the Facility accepted and stored for 36 days one 55-gallon drum containing 226 kilograms of polychlorinated biphenyl contaminated waste before shipping it to an unauthorized disposal facility.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual			
Potential		x	

Percent 15.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment $21,250

$3,750

Violation Events

Number of Violation Events: 5 — 397 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty $18,750

Five quarterly events are recommended from the August 22, 2018 date waste was accepted at the facility to the September 23, 2019 date of compliance.

Good Faith Efforts to Comply

25.0% Reduction $4,687

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: The Respondent came into compliance on September 23, 2019 prior to the NOE dated April 14, 2020.

Violation Subtotal $14,063

Economic Benefit (EB) for this violation

Estimated EB Amount $3,792

Statutory Limit Test

Violation Final Penalty Total $12,188

This violation Final Assessed Penalty (adjusted for limits) $12,188

Economic Benefit Worksheet

Respondent SET ENVIRONMENTAL, INC.
Case ID No. 59252
Reg. Ent. Reference No. RN100607126
Media Industrial and Hazardous Waste
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal	$69,725	22-Aug-2018	23-Sep-2019	1.09	$3,792	n/a	$3,792
Permit Costs				0.00	$0	n/a	$0
Other (as needed)				0.00	$0	n/a	$0
Notes for DELAYED costs	Actual cost per invoice (rounded to the dollar) to dig up and transport the waste to an authorized facility. The Date Required is the date the Respondent accepted the waste and the Final Date is the date of compliance.						
Avoided Costs	**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs							

Approx. Cost of Compliance $69,725

TOTAL $3,792

Screening Date 22-Apr-2020 **Docket No.** 2020-0592-IHW-E **PCW**

Respondent SET ENVIRONMENTAL, INC.

Policy Revision 4 (April 2014)

Case ID No. 59252

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100607126

Media Industrial and Hazardous Waste

Enf. Coordinator Stephanie McCurley

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code § 335.152(a)(7) and 40 Code of Federal Regulations § 264.173(a) and Hazardous Waste Permit No. 50267 PP II.A.2, II.C.1.j, and C.2.g

Violation Description Failed to ensure that hazardous waste containers remain closed when in storage except when adding or removing waste. Specifically, two 55-gallon drums located in container storage area CS-2 and one 55-gallon drum in CS-3 were open.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual			
Potential		x	

Percent 15.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment $21,250

$3,750

Violation Events

Number of Violation Events: 1

73 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty $3,750

One quarterly event is recommended from the October 8, 2019 investigation date to the December 20, 2019 date of compliance.

Good Faith Efforts to Comply

25.0% Reduction $937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: Respondent came into compliance by providing photographs of the drums with new lids on December 20, 2019 prior to the Notice of Enforcement ("NOE") dated April 14, 2020.

Violation Subtotal $2,813

Economic Benefit (EB) for this violation

Estimated EB Amount $2

Statutory Limit Test

Violation Final Penalty Total $2,438

This violation Final Assessed Penalty (adjusted for limits) $2,438

Economic Benefit Worksheet

Respondent SET ENVIRONMENTAL, INC.
Case ID No. 59252
Reg. Ent. Reference No. RN100607126
Media Industrial and Hazardous Waste
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$150	8-Oct-2019	20-Dec-2019	0.20	$2	n/a	$2
Notes for DELAYED costs	Estimated delayed cost to fit the three drums with new lids ($50 per lid). The Date Required is the investigation date and the Final Date is the date of compliance.						
Avoided Costs	**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	$150	TOTAL	$2

Screening Date 22-Apr-2020 **Docket No.** 2020-0592-IHW-E **PCW**

Respondent SET ENVIRONMENTAL, INC.

Policy Revision 4 (April 2014)

Case ID No. 59252

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100607126

Media Industrial and Hazardous Waste

Enf. Coordinator Stephanie McCurley

Violation Number 3

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1) and Hazardous Waste Permit No. 50267 PP II.A.2 and V.A.1

Violation Description Failed to clearly identify authorized storage units with signs indicating "TCEQ Permit Unit No.". Specifically, permitted tank PT-12 did not have an identifying sign and signs on permitted container storage areas CS-1 and CS-2 were faded and illegible.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor
		x	

Percent 7.0%

Matrix Notes: 30-70% of the rule requirement was not met.

Adjustment $23,250

$1,750

Violation Events

Number of Violation Events 1 — 73 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty $1,750

One quarterly event is recommended from the October 8, 2019 investigation date to the December 20, 2019 date of compliance.

Good Faith Efforts to Comply

25.0% Reduction $437

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: Respondent came into compliance by providing photographs of the signage on December 20, 2019 prior to the NOE dated April 14, 2020.

Violation Subtotal $1,313

Economic Benefit (EB) for this violation

Estimated EB Amount $10

Statutory Limit Test

Violation Final Penalty Total $1,138

This violation Final Assessed Penalty (adjusted for limits) $1,138

Economic Benefit Worksheet

Respondent SET ENVIRONMENTAL, INC.
Case ID No. 59252
Reg. Ent. Reference No. RN100607126
Media Industrial and Hazardous Waste
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$1,000	8-Oct-2019	20-Dec-2019	0.20	$10	n/a	$10
Notes for DELAYED costs	Estimated delayed cost to provide signage for the tank and two storage areas. The Date Required is the investigation date and the Final Date is the date of compliance.						
Avoided Costs	ANNUALIZE avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	$1,000	TOTAL	$10

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 3, 2022

Mr. Daniel Didier, Compliance Director
SET Environmental, Inc.
5738 Cheswood Street
Houston, Texas 77087

Re: Compliance Evaluation Investigation at:
SET Environmental, 5738 Cheswood Street, Houston (Harris County), Texas
TCEQ SWR No.: 50267; Permit No.: 50267; EPA ID No.: TXD055135388

Dear Mr. Didier:

On December 02, 2021, Ms. Naomi Hall, of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for industrial solid waste. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Hall in the Houston Region Office at (713) 767-3702.

Sincerely,

Carlos R. Romo

Carlos R. Romo Team Leader
Waste Section
Houston Region Office

CRR/NGH/lm

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 8, 2023

Mr. Daniel Didier, Compliance Director
Set Environmental, Inc.
5738 Cheswood Street
Houston, Texas 77087

Re: Compliance Evaluation Investigation at:
Set Environmental, 5738 Cheswood Street, Houston (Harris County), Texas
TCEQ SWR No.: 50267; Permit No. 50267; EPA ID No.: TXD055135388

Dear Mr. Didier:

On October 23, 2023, Ms. Oindrila Das of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for industrial solid waste and municipal solid waste. Enclosed is a summary which lists the investigation findings.

During the investigation, some concerns were noted which were alleged violations that have been resolved as Areas of Concern based on subsequent corrective action. In addition, some additional issues were identified that have been addressed. No further response from you is necessary concerning this investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Das in the Houston Region Office at (713) 767-3749.

Sincerely,

Kendra Bernhagen

Kendra Bernhagen, Team Leader
Waste Section
Houston Region Office

KB/OD/sj

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

SET ENVIRONMENTAL
5738 CHESWOOD ST
HOUSTON, HARRIS COUNTY, TX 77087

Investigation # 1924719
Investigation Date: 10/23/2023

Additional ID(s): 50267
TXD055135388
50267

AREA OF CONCERN

Track No: 860610

30 TAC Chapter 335.6(c)

PERMIT 50267, Permit Provision (PP) II.C.1.h.

Alleged Violation:

Investigation: 1924719 Comment Date: 12/07/2023

The facility failed to maintain and update their Notice of Registration (NOR) as required.

The facility's NOR needs to be updated as follows:

a. Add waste currently managed at unit to NOR No. 045 or update waste management unit (Nonhazardous miscellaneous storage container) as inactive.

Recommended Corrective Action: The facility is requested to update the NOR through the State of Texas Environmental Electronic Reporting System (STEERS) and/or by sending a form (Notification for hazardous and industrial waste management) to the TCEQ Registration and Reporting Section (PO Box 13087, Mail Code 129, Austin, Texas 78711-3087).

Resolution: The alleged violation has been resolved as an area of concern based on the documentation submitted on October 29, 2023, to the TCEQ Houston Region Office, indicating that the NOR has been updated.

Track No: 860612

30 TAC Chapter 305.142

PERMIT 50267, PP II.A.2./V.A.1.

Alleged Violation:

Investigation: 1924719 Comment Date: 11/08/2023

The facility failed to label or mark the authorized waste management unit, permitted tank (Permit No. 015/NOR No. 039) with a sign indicating "TCEQ Permit Unit No. 015, as required by the permit.

Recommended Corrective Action: The facility was required to label the permitted tank properly and provide photographic documentation to the TCEQ Houston Region Office to verify compliance.

Resolution: The alleged violation has been resolved as an area of concern based on the photographic documentation submitted on October 29, 2023, to the TCEQ Houston Region Office.

ADDITIONAL ISSUES

Description **Additional Comments**

Item #3	During the walkthrough, the SAAs 3, 4, and 5 were noted without the label or mark 'Satellite Accumulation Area. The facility was requested to label or mark the area properly and send the photographic documentation to the TCEQ Houston Region Office. The additional issue has been addressed based on the documentation submitted on October 29, 2023, to the TCEQ Houston Region Office.
Item #4	During the investigation, the permitted tank, NOR No. 051, was noted to be inactive. Additionally, it was noted that the permitted tank, NOR No. 039, has not been in use for a year. The facility was requested to review the permitted tanks for closure per 30 TAC §335.8 - Closure and Remediation, and 30 TAC §350 - Texas Risk Reduction Program. The additional issue has been addressed based on the documentation submitted on November 16, 2023, to the TCEQ Houston Region Office, stating that the facility reviewed and elected to close the tank, NOR No. 039 and to retain the tank, NOR No. 051 for future use.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 17, 2024

Mr. Walter Kilgus
General Manager
SET Environmental, Inc.
5738 Cheswood Street
Houston, Texas 77087-4002
Via Email

Re: General Compliance Letter for the Modified Comprehensive Compliance Investigation at:
SET Environmental, Inc. 5743 Cheswood Street, Houston, Harris County, Texas
Regulated Entity No.: 100607126, TCEQ ID No.: WQ0004123000, EPA ID No.: TX0119211
Investigation No.: 1994541

Dear Mr. Kilgus:

On June 18, 2024, Ms. Jimi Savage of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced facility to evaluate compliance with the applicable requirements for wastewater treatment. No violations are being alleged as a result of the investigation; however, please see the attached Area of Concern.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Jimi Savage in the Houston Region Office at (713) 767-3657.

Sincerely,

Elaine Fowler
Water Section Team Leader
Houston Region 12

EF/JS/kg

cc: Mr. Daniel Didier, Compliance Director, SET Environmental, Inc.
Via Email

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

SET ENVIRONMENTAL **Investigation # 1994541**

5738 CHESWOOD ST **Investigation Date: 06/18/2024**

HOUSTON, HARRIS COUNTY, TX 77087

Additional ID(s): WQ0004123000
TX0119211

AREA OF CONCERN

Track No: 883609

30 TAC Chapter 305.125(1)
30 TAC Chapter 319.7(d)

PERMIT WQ0004123000, Monitoring & Reporting Requirements 1
EPA ID TX0119211, Monitoring & Reporting Requirements 1

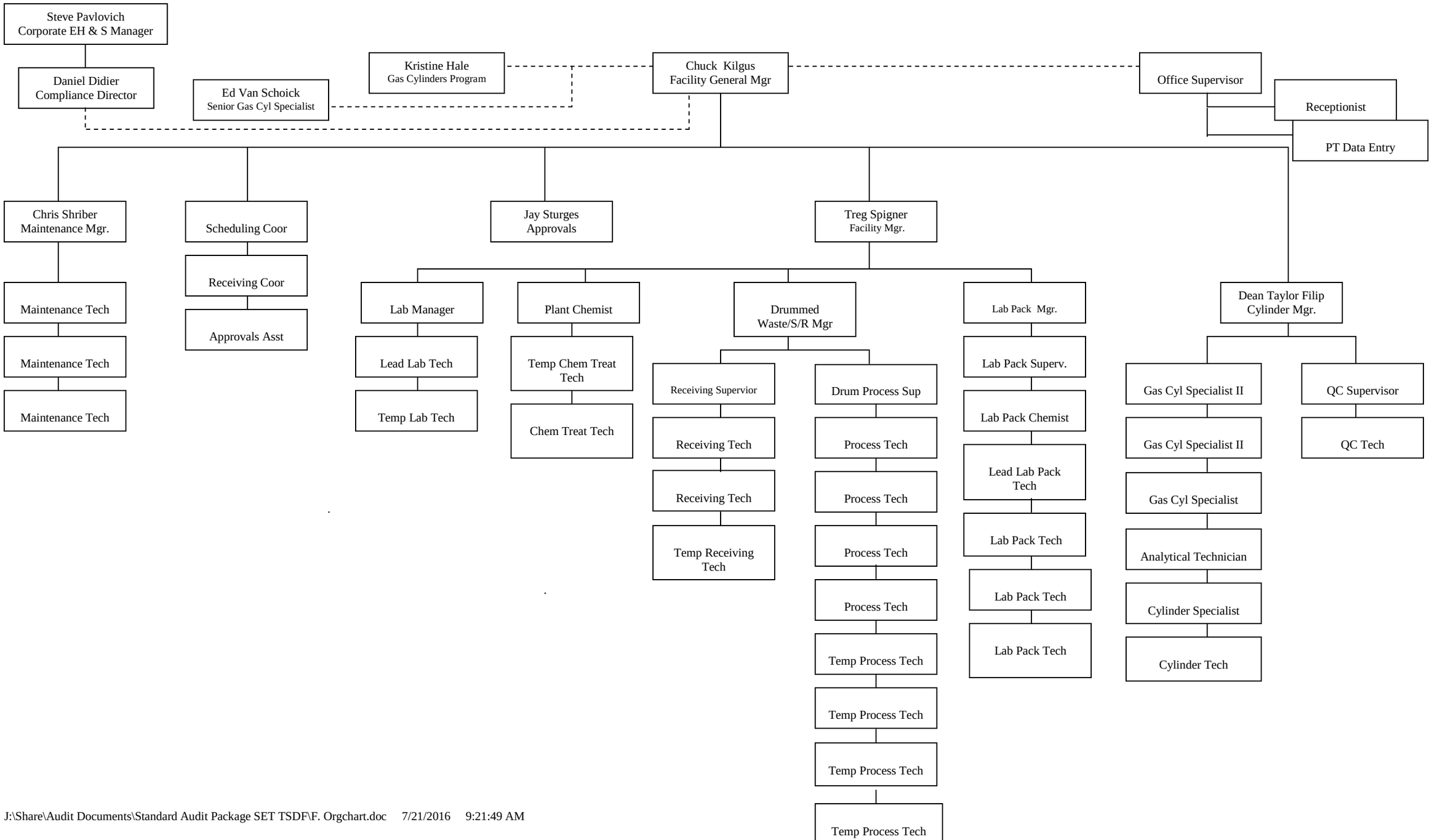
Alleged Violation:

Investigation: 1994541 Comment Date: 06/21/2024

Failure to submit the discharge monitoring reports (DMRs) within the required timeframe. Specifically, during the record review period of June 2023 through June 2024, three (3) monthly DMRs (October 2023, February 2024, and March 2024) were submitted after the 20th day of the following months (November 28, 2023, March 28, 2024, and April 22, 2024, respectively).

Recommended Corrective Action: DMRs must be submitted by the 20th day of the month following the month in which the DMR was submitted for. The regulated entity shall submit documentation indicating that DMRs are being submitted on time.

Resolution: DMRs for the months of April and May 2024 were submitted on time by the regulated entity.


Steve Pavlovich
Corporate EH & S Manager
Daniel Didier
Compliance Director
Ed Van Schoick
Senior Gas Cyl Specialist
Kristine Hale
Gas Cylinders Program
Chuck Kilgus
Facility General Mgr
Office Supervisor
Receptionist
PT Data Entry
Chris Shriber
Maintenance Mgr.
Maintenance Tech
Maintenance Tech
Maintenance Tech
Scheduling Coor
Receiving Coor
Approvals Asst
Jay Sturges
Approvals
Treg Spigner
Facility Mgr.
Lab Manager
Lead Lab Tech
Temp Lab Tech
Plant Chemist
Temp Chem Treat Tech
Chem Treat Tech
Drummed Waste/S/R Mgr
Receiving Supervior
Receiving Tech
Receiving Tech
Temp Receiving Tech
Drum Process Sup
Process Tech
Process Tech
Process Tech
Process Tech
Temp Process Tech
Temp Process Tech
Temp Process Tech
Temp Process Tech
Lab Pack Mgr.
Lab Pack Superv.
Lab Pack Chemist
Lead Lab Pack Tech
Lab Pack Tech
Lab Pack Tech
Lab Pack Tech
Dean Taylor Filip
Cylinder Mgr.
Gas Cyl Specialist II
Gas Cyl Specialist II
Gas Cyl Specialist
Analytical Technician
Cylinder Specialist
Cylinder Tech
QC Supervisor
QC Tech

XVII. PERSONNEL TRAINING PROGRAM

1.0 PURPOSE

The purpose of this program is to establish procedures for effective classroom and on-the-job training in company and governmental environmental, health and safety requirements. To this end training will focus on:

1. The hazardous nature of chemicals and chemical wastes.
2. The purpose of applicable governmental regulations and the importance of maintaining compliance with these regulations.
3. Proper handling and storage procedures.
4. Emergency procedures.
5. Standard operating and safety procedures.
6. Cardiopulmonary resuscitation (CPR) and standard first aid.

SET Environmental training program is divided into the following five categories:

- Administrative
- Safety
- Technical
- Regulatory
- Operational

Provisions are made for updating or revising training programs as necessary to ensure compliance with company and government requirements.

2.0 FREQUENCY, TYPE AND AMOUNT OF TRAINING

Training must be completed prior to actual work participation. New employees spend their first three months of employment in training. Initial training includes a minimum of forty hours of classroom instruction and demonstration for each new employee. Initial training obtained prior to employment at SET Environmental will be accepted for non-site specific topics if proof of training can be provided to SET Environmental. In addition to classroom training, each new employee is required to complete 456 hours (or the balance of three months) of on-the-job training under the direct supervision of an employee trained and experienced in the same or similar job position.

Employees will receive a minimum of eight hours of annual review training to maintain their competencies obtained through initial training in a classroom instruction format. Although authorized by 1910.120(q)(8), SET Employees may not demonstrate competency in lieu of actual annual classroom instruction. When successfully completed a certificate of training will be issued. Review training provided on an annual, biannual or triennial frequency is specified in

Figures 1 and 2. Annual review for TSDF employees will also include discussion on the following topics:

1. The status of storage and operating conditions and procedures, noting any areas where there are problems or potential problems. Employees participate in developing effective solutions.
2. The requirements of the facility's RCRA permit, noting any changes that have occurred in the past year. Areas where maintenance of compliance is a problem are identified and discussed; effective solutions are sought.
3. Incidents that occurred in the past year that required implementation of the contingency plan or emergency action. This review focuses on the cause of the incident and identification of steps to be taken to prevent or to ensure better handling of such events in the future.

The chart below summarizes the amount of initial and continued training.

Initial Training

Classroom instruction	40 hours
On-the-job training	456 hours

Continuation Training

Annual review	8 hours/year

Training is supplemented by memorandum format updates on new or modified policies and procedures required as a result of regulatory changes, receipt of new equipment, etc. This information will be presented to employees during daily tailgate meetings, monthly safety meetings of formal classroom instruction. For administrators and managers, ongoing training will also include outside technical seminars or training programs on hazardous waste management and emergency response.

3.0 TRAINER CREDENTIALS

Program administrator for each location identified below directs SET Environmental's training program.

LOCATION	PLAN ADMINISTRATOR
Houston	Daniel A. Didier
Dallas	Tad Defrange
Wheeling	Steve Pavlovich
Bridgeview	Mike Ortiz

In order to maximize training efficiency and effectiveness, SET Environmental personnel or off-site training organizations may present actual classroom instruction.

Trainers shall have satisfactorily completed a training course for teaching the subjects they are expected to teach or they shall have the training and/or academic credentials and instructional experience necessary to demonstrate competent instructional skills and a good command of the subject matter of the courses they are to teach. SET will choose trainers that have obtained a high level of expertise either through education and/or experience.

No one individual can provide expertise in every area. Therefore SET's will utilize the talents of several employees throughout the organization, including but not limited to:

- Compliance Director
- Safety Officer
- General Manager
- Chemical Engineer
- Department Heads
- Project and Area Manager
- Supervisor
- Chemists

4.0 JOB DESCRIPTIONS

As an environmental management company virtually all SET employees (with the exception of certain administrative staff) perform or have the potential to perform tasks that involve handling hazardous waste, substances and/or materials. SET Environmental requires all employees to be involved in the degree of training appropriate to their responsibilities. The following is a description of divisions within the SET organization.

1. Administration is concerned primarily with overall division management at the facility with a focus on the regulatory and policy oriented aspects of hazardous waste management at the facility.

2. The Environmental Field Services Division provides lab-packing services for; drum surveys and sampling, site remediation, and emergency response for SET Environmental customers.

3. The Approval and Permitting Division is responsible for regulatory and technical approval of waste stream profiles and lab pack inventories submitted by customers. Personnel in this division will also profile waste streams and lab packs destined for off-site treatment, disposal, recycling or use.

4. The Laboratory Division is responsible for sample prequalification (verification of analytical data provided with waste stream profile and assessment for treatability), load fingerprinting, characterization of materials for off-site disposal and testing required for process monitoring.

5. The Transportation Division is responsible for the safe loading, unloading and movement of hazardous and non-hazardous materials from the generator to disposal facility.

6. The TSDF Production Division is directly involved in hazardous waste handling at SET's TSDF in Houston. This division is responsible for the processing (fuel blending, neutralization, chlorination, hydrolysis, segregation and consolidation) of hazardous wastes, sampling incoming loads, truck loading and unloading and facility housekeeping and maintenance.

7. The Industrial Cleaning Division is primarily involved with site remediation activities.

Each SET location will maintain a list of current employees, with job titles and descriptions (see Figure 4).

5.0 TRAINING SUBJECT MATTER

Figure 1 outlines area of instruction by major training topics (e.g., Administration, Safety). Figure E-2 identifies training required by regulatory agencies that applies to activities performed by SET Environmental personnel. Depending on job responsibilities, each employee may not be required to complete every area of instruction under the major training topic. With respect to the Topic entitled "Hazardous Waste And Emergency Response" Training shall be based on the duties and function to be performed by each employee as detailed below.

5.1 First Responder Awareness Level

These are employees who are likely to witness or discover a hazardous substance release and have been trained to initiate an emergency response sequence by notifying proper company officials or proper authorities of the release (e.g., maintenance worker or security guard). To this end training will focus on recognizing, identify and understanding the hazards associated with hazardous substances when released. In the event of a hazardous substance release, the employee will have received training that enables them to notify appropriate company employees and/or out side entities. Employees trained at the first responder awareness level would not take part in further emergency response activities. The length of training will be sufficient to train the employee to perform these functions.

5.2 First Responder Operations Level

These employees would respond to releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. Their primary objective will be to contain the release from a safe distance, keep it from spreading, and prevent exposures without actually trying to stop the release. These employees will receive training equivalent to that provided to the first responder awareness level employee. In addition the first responder operations level employee will be trained to understand the following:

- Basic hazard and risk assessment techniques.
- Selection and use proper PPE.
- An understanding of basic hazardous materials terms.
- Perform basic control, containment operations.
- Implementation of basic decontamination procedures.
- Standard operating and termination procedures.

The length of training is a minimum of 8 hours.

5.3 Hazardous Materials Technician

These are employees that respond to releases for the purpose of stopping the release. Hazardous materials technicians will be provided with a minimum of 24 hours of training equal to the first responder operations level and have understand the following:

- Implementation of SET's emergency response plan.
- Classification, identification and verification of known and unknown materials by using field survey instruments and equipment.
- Be able to function within an assigned role in the Incident Command System.
- Selection and use proper specialized chemical personal protective equipment.

- Hazard and risk assessment techniques.
- Perform advance control, containment operations.
- Decontamination procedures.
- Termination procedures.
- Basic chemical and toxicological terminology and behavior.

5.4 Hazardous Materials Specialist

These employees respond with and provide support to hazardous materials technicians. Their duties are similar to the hazardous materials technician, however, will have a higher level of knowledge of the substance. The specialist may also act as the site liaison with Federal, state, local and other government authorities when authorized for that role by the incident commander. Hazardous materials specialists will receive a minimum of 24 hours of training equal to the technician level and understand the following areas:

- Implementation of the local emergency response plan.
- Classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment.
- State emergency response plan.
- Selection and use proper specialized chemical personal protective equipment.
- In-depth hazard and risk techniques.
- Perform specialized control, and containment operations.
- Decontamination procedures.
- Develop a site safety and control plan.
- Chemical, radiological and toxicological terminology and behavior.

5.5 On Scene Incident Commander

This individual will assume control of the incident scene beyond the first responder awareness level and will receive at least 24 hours of training equal to the first responder operations level and in addition have understand the following areas:

- Implemention of SET's incident command system.
- Implementation of SET's emergency response plan.
- Hazards and risks associated with employees working in chemical protective clothing.
- Implementation of local emergency response plan.
- The state emergency response plan and knowledge of the Federal Regional Response Team.
- Importance of decontamination procedures.

5.6 Certification of Training

SET will certify that training has been successfully completed. This certification will include the employees name, level/position of training (e.g., technician, specialist), number of hours completed, and the date of completion.

6.0 RECORD KEEPING

Records documenting the job title for each position, job descriptions, names of employees, and completed training will be kept at the SET Environmental office. These records and other documents verifying training will be kept for all current employees and for three years from the date of the individual employee's termination.

FIGURE 1

SET TRAINING OUTLINE

ADMINISTRATIVE

- Internal Policies
- Internal Forms and Recordkeeping

SAFETY TOPICS

Workplace Hazards and Safety

- Bloodborne Pathogens
- Chemical and Physical Hazards
- Confined Space Entry
- Control of Hazardous Energy (Lockout/Tagout)
- Electrical Safety
- Fall Protection
- First Aid and CPR
- Hazard Communication
- Hazardous Waste Operations and Emergency Response
- Introduction to Toxicology
- Occupational Exposure to Hazardous Chemicals in Laboratories
- Portable Fire Extinguishers
- Scafolding
- Trenching and Shoreing
- Welding Cutting and Hotwork

Personnel Protective Equipment

- Respiratory Protection Program
- Personnel Protective Equipment

Contingency Plan and Emergency Procedures

- Emergency Procedures
- Emergency Equipment
- Emergency Systems
- Procedures for using, inspection, repairing and replacing facility emergency and monitoring equipment.
- Key parameters for manual waste feed cutoff systems.
- Communications and alarm systems
- Response to fires or explosions
- Shutdown of operations

TECHNICAL TOPICS

Hazardous Waste Chemistry

Sampling Techniques

REGULATORY TOPICS

Hazardous Waste and Materials Management[3]

- Waste Classification (RCRA)
- Hazardous Substance Determination and Reporting Requirements (CERCLA)
- Hazardous Materials Classification (DOT)
- Shipping Descriptions
- Packaging
- Container Marking
- Container Labeling
- Hazardous Materials Segregation
- Manifest System
- Land Disposal Restriction Regulations
- Placarding for Highway Transportation

OPERATIONAL TOPICS

Equipment

- Drum Movement/Operating Equipment (Forklift Operation)
- Equipment and Capabilities

Record Keeping and RCRA Requirements

- Waste Inventory System
- Operating Record System
- Inspection Procedures
- Waste Analysis

Standard Operating Procedures

- Shipping and Receiving
- Organic Liquids Processing
- Waste Consolidation
- Chemical Treatment (Neutralization, Re-Dox, Hydrolysis)
- Lab Pack Operations
- Laboratory Operations

FIGURE 2
GOVERNMENTAL TRAINING REQUIREMENT SUMMARY

DESCRIPTION	REGULATORY SITE		INITIAL	ANNUAL REVIEW	OTHER REVIEW FREQUENCY	CERTIFICATION REQUIRED[1]
	CFR	Paragraph	(Hours)	(Hours)	(See foot notes)	(Yes, No)
Emergency Action Plans	29	1910.38(e)&(f)	X		2	N
Hearing Conservation	29	1910.95(k)	X	X		N
Hazwoper Uncontrolled Waste Sites	29	1910.120(e)	40	8		Y
Hazwoper TSDF Operations	29	1910.120(p)(7)	24	8		Y
Hazwoper ER First Responder Awareness Level	29	1910.120(q)(6)(i)	X			N
Hazwoper ER First Responder Operations Level	29	1910.120(q)(6)(ii)	8	X		Y
Hazwoper ER Hazardous Materials Technician	29	1910.120(q)(6)(iii)	24	X		Y
Hazwoper ER Hazardous Materials Specialist	29	1910.120(q)(6)(iv)	24	X		Y
Hazwoper ER On Scene Incident Commander	29	1910.120(q)(6)(v)	24	X		Y
Personal Protective Equipment (Eye, Head and Hand)	29	1910.132(f)	X		3	Y
Respiratory Protection	29	1910.134(k)	X	X	3	N
Confined Space Entry	29	1910.146(g)	X		3	Y
Confined Space Entry Rescue Training with CPR and First Aid	29	1910.146(k)(2)	X	X		N
First Aid and CPR	29	1910.146(k)(2)	X	X	3	Y
Control of Hazardous Energy (Lockout/Tagout)	29	1910.147(c)(7)	X		3	Y
Portable Fire Extinguishers	29	1910.157(g)	X	X		N
Powered Industrial Trucks (e.g., Forklifts)	29	1910.178(l)	X		4	Y
Welding Cutting and Hotwork	29	1910.253	X			N
Electrical Safety	29	1910.332(b)	X		3	N
Asbestos Abatement	29	1910.1001	X	X		N
Bloodborne Pathogens	29	1910.1030(g)(2)	X	X		N
Hazard Communication	29	1910.1200(h)	X		5	N
Occupational Exposures to Hazardous Chemicals in Laboratories	29	1910.1450(f)	X		5	N
Scafolding	29	1926.454	X		3	N
Fall Protection	29	1926.503	X		3	Y
Trenching and Shoreing	29	1926.651	X			N
Contingency Plan and Emergency Preparedness (RCRA)	40	265.16	X	X		N
Hazardous Materials (DOT)	49	172.700	X		4	Y

1 Although a specific certification may not be required by the standard, SET must document training and demonstrate that the employee understands the material covered. Most of these standards specify areas of training that must be covered and understood.

2 When the plan or the employees responsibilities under the plan change.

3 Recurrent training is required when changes in the workplace or safety procedures render previous training obsolete; or an employees use or knowledge of the safety procedures are inadequate.

4 Recurrent training is required every three (3) years.

5 Recurrent training is required when a new physical or health hazard is introduced into the employees work area that they have not previously received training on.

X Initial and/or recurrent training is required; however, the number of hours is not mandated by law.

FIGURE 3
HOUSTON CURRENT EMPLOYEES, DIVISION, and JOB TITLES

Available upon request.

FIGURE 4
JOB DESCRIPTIONS

Available upon request.

SET Environmental, Inc.
5738 Cheswood • Houston, Texas 77087
Main: 713 645 8710 • Fax: 713 649 1027
www.setenv.com

Approval No. _____ - _____
Page _____ of _____

GAS CYLINDER PROFILE

U.S. EPA I.D. NO. TXD055135388 TWC Permit No. HW-50267

GENERAL INFORMATION

GENERATOR NAME: _____
MAILING ADDRESS: _____ SITE ADDRESS: _____
_____ _____
CONTACT: _____ _____
PHONE: ( ) _____

U.S. EPA I.D. NO. | | | | | | | | | | | | **TWC REG. NO.** | | | | |

TEXAS WASTE CODES:
| | | | | | | | | | | | |

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Main: 713 645 8710 • Fax: 713 649 1027
www.setenv.com

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GAS CYLINDER PROFILE
CONTINUATION SHEET

U.S. EPA I.D. NO. TXD055135388 TWC Permit No. HW-50267

DESCRIPTION AND QUANTITY

❶ COMPONENTS/PERCENT	❷ EPA WASTE NUMBER	❸ DOT HAZARD CLASS	❹ NO OF CYLINDERS	❺ SIZE DIAM. X LENGTH (INCHES)	❻ CYLINDER IDENTIFICATION NUMBER(S)	❼ DRUM OR BOX NO (If Applicable)	T1 USE ONLY TRT CODE	T1 USE ONLY UNIT PRICE	T1 USE ONLY UNIT ACCRUAL

CERTIFICATIONS

GENERATOR: I hereby certify that the items described in this summary and attached inventories are not radioactive, pathogenic or infectious and do not contain 2, 3, 7, 8-tetrachloro-p-dibenzodioxon (dioxon) or bidenzofurans I further certify that all information submitted in this and all attached documents is complete and accurate, and that all known or suspected hazards have been disclosed. I understand that I am responsible for the representation of every container of waste material and that any misrepresented unidentified off-specification or unapproved containers may result in drum rejection additional charges being assessed and/or materials being returned to generator.

SIGNATURE: _____ TITLE: _____ DATE: _____

Printed Name: _____

PACKAGING AGENT: I certify that all materials have been packaged in accordance with 49 CFR 173 25 I certify that any and all information necessary for specific representation of the waste has been disclosed on the attached inventories

SIGNATURE: _____ TITLE: _____ DATE: _____

Printed Name: _____

Copy distribution: white-T1; yellow-generator

SET Environmental, Inc.
5743 Cheswood Street - Houston, IX 77087
713-645-8710 // 800-598-7328 // Fax: 713-649-1027

Cylinder ID Number(s): _____

_____

Total Number Cylinders Exactly Matching this Report: ☐

COMPRESSED GAS CYLINDER INSPECTION REPORT

I. GENERAL INFORMATION

GENERATOR: _____ BROKER NAME: _____

EPA CODE(S): ☐ ☐ TEXAS WASTE CODE: ☐

CONTENTS

_____
(enter gas name here)
Content Information is based on: ☐ Mfg Lable ☐ Suspected ☐ Analysis (Please Attach)

SHIPMENT MODE

☐ Boxes ☐ Drums ☐ Palletized
☐ Other (Specify) _____

II. CYLINDER INFORMATION:

DIMENSIONS (Inches): _____ (Length (not including valve)) X _____ (Diameter) WEIGHT (Pounds): _____ (Gross), _____ (Tare), _____ (Net)

SIZE

☐ Lecture <3" x <12" ☐ Small <4" x <24"
☐ Medium <10" x <36" ☐ Large <16' x <54"

EXTERNAL CONDITION

☐ Excellent ☐ Good ☐ Fair
☐ Poor ☐ Questionable

CYLINDER COMMENTS

_____
_____
_____

PHYSICAL STATE

☐ Liquified Compressed Gas ☐ Compressed Gas ☐ Non-Pressurized Liquid

MFG LABLE ATTACHED

☐ Yes ☐ No

VALVE PROTECTIVE CAP

Present: ☐ Yes ☐ No
Removable: ☐ Yes ☐ No

DOT/ICC Spec: _____ Last Hydrostatic Test Date: ☐

COLORS: _____

III. VALVE INFORMATION:

EXTERNAL CONDITION

☐ Excellent ☐ Good ☐ Fair
☐ Poor ☐ Questionable

WORKING CONDITION

☐ Yes ☐ No ☐ Unknown

VALVE COMMENTS

_____
_____
_____

Pressure Relief: ☐ Yes ☐ No **Location:** ☐ On Valve ☐ On Cylinder **Type:** ☐ Plug ☐ Disk ☐ Spring Loaded

CGA OUTLET NUMBER(If known): ☐

IV. SHIPPING INFORMATION:

DOT SHIPPING DESCRIPTION: _____

HAZARD CLASS: ☐ UN/NA: ☐

Poison Inhalation: ☐ Yes ☐ No **ZONE:** ☐ A, ☐ B, ☐ C, ☐ D

NOTE: GASES WITH CLASS 2.3 MUST HAVE A VALVE OUTLET PLUG OR CAP.

Inspection Completed by: _____ Date: _____

SET Environmental, Inc.
5738 Cheswood • Houston, Texas 77087
Main: 713 645 8710 • Fax: 713 649 1027
www.setenv.com

Approval No _____ - _____
Page _____ of _____

LAB PACK SUMMARY

U.S. EPA I.D. NO. TXD055135388 TWC Permit No. HW-50267

GENERATOR NAME: _____

MAILING ADDRESS: _____ SITE ADDRESS: _____

_____ _____

CONTACT: _____ _____

PHONE: ( ) _____ FAX: ( ) _____

U.S. EPA I.D. NO. | | | | | | | | | | | | **TWC REG. NO.** | | | | |

BROKER NAME: _____ CONTACT: _____

BILLING ADDRESS: _____ PHONE: ( ) _____

_____ FAX: ( ) _____

TREATMENT CODE	CONTAINER SIZE	CONTAINER ID NUMBER	TEXAS WASTE CODE*	T1 USE ONLY	

TOTAL NO. OF CONTAINERS

*If you are an out of state generator, you may assign the Texas Waste Code which best describes the contents of the container in the following manner: Start with the sequence number OUTS, then add the form code (described below) and end with the classification code (described below). If the generating facility is located in Texas, assign the Texas Waste Code which best describes the contents of the container in the same manner as described above except you should assign an arbitrary 4 digit sequence number that will be used each time you ship a particular form of lab pack. If this will be the only time lab packs will be shipped from this facility then form TWC0757 must be completed and submitted to the TNRCC In this situation the TNRCC will assign the Texas Waste Code

FORM CODES

001 – Lab packs of old chemicals only
002 – Lab packs of debris only
004 – Lab packs containing acute hazardous wastes

CLASSIFICATION CODES

H – Hazardous per RCRA
1 – Class 1 (nonhazardous)

Packing Medium: Vermiculite _____ Clay-based _____ Sawdust _____ Corn Cob (Slikwik) _____ Other: _____

Packing exemption, if any: DOT E- _____

Comments: _____

GENERATOR: I hereby certify that the items described in this summary and attached inventories are not radioactive, pathogenic or infectious and do not contain 2, 3, 7, 8-tetrachloro-p-dibenzodioxon (dioxon) or bidenzofurans I further certify that all information submitted in this and all attached documents is complete and accurate, and that all known or suspected hazards have been disclosed. I understand that I am responsible for the representation of every container of waste material and that any misrepresented unidentified off-specification or unapproved containers may result in drum rejection additional charges being assessed and/or materials being returned to generator

SIGNATURE: _____ TITLE: _____ DATE: _____

Printed Name: _____

PACKAGING AGENT: I certify that all materials have been packaged in accordance with 49 CFR 173 25. I certify that any and all information necessary for specific representation of the waste has been disclosed on the attached inventories

SIGNATURE: _____ TITLE: _____ DATE: _____

Printed Name: _____

Copy distribution: white-T1; yellow-generator

SET Environmental, Inc.
5738 Cheswood • Houston, Texas 77087
(713) 645-8710 • (800) 598-7328 • Fax (713) 649-1027
visit our website: www.setenv.com

LAB PACK INVENTORY

GENERATOR: _____

DOT SHIPPING DESCRIPTION: _____

_____

PRIMARY DOT HAZARD CLASS: _____ CONTAINER SIZE: _____

DOT IDENTIFICATION NUMBER: _____ PG _____ CONTAINER TYPE: _____

DOT ADDITIONAL DESCRIPTORS: _____ PACKING MEDIUM: _____

DOT LABELS ___ 3 ___ 4.1 ___ 4.2 ___ 4.3
___ 5.1 ___ 5.2 ___ 6.1 ___ 8 ___ 9

CONTAINER NO: _____

PROFILE NO: _____

MANIFEST NO: _____

PACKED BY: _____

DATE PACKED: _____

T-1 USE ONLY ROUTE	ITEM (1)	DESCRIPTION: All items must be 100% identified with all components and concentrations listed (2)	SL or G (3)	QTY (4)	PRIMARY HAZARD CLASS (5)	SUB. HAZARD CLASS (6)	PG I II III (7)	LAND DISPOSAL RESTRICTION NOTIFICATION INFORMATION			
								RCRA WASTE CODE (8)	SUBCATEGORY CODE (9)	F-Solvent or UHC Codes (10)	WW NWW (11)

Copy Distribution: white – SET Environmental; yellow – generator; pink – manifest; goldenrod – drum

Revised June, 2004
Form #: TO-018

SET Environmental, Inc.
5738 Cheswood Street - Houston, TX 77087
713-645-8710 // 800-598-7328
Fax: 713-649-1027
www.setenv.com

TNRCC Permit No. HW-50267
EPA ID No. TXD055135388

WASTESTREAM PROFILE

Treatment One Use Only

Approval No : _____ Treatment/Handling Code: _____
Sales Rep: _____ Disposal Accrual: _____
Pricing: _____

I. GENERATOR INFORMATION

Generator _____ **Broker Name** _____
Contact _____ **Contact** _____
Telephone _____ **Telephone** _____
Fax _____ **Fax** _____
Mailing Address _____ **Mailing Address** _____
City, State Zip _____ **City, State Zip** _____
Site Address _____
City, State Zip _____

U.S. EPA ID No: _____ Texas Generator ID No. _____

II. GENERAL WASTE INFORMATION

Wastestream Name: _____

FREQUENCY
☐ One Time ☐ Yearly
☐ Monthly ☐ Quarterly
☐ Other _____

CONTAINER TYPE
☐ Metal ☐ Wood
☐ Poly ☐ Fiber

QUANTITY
_____ ☐ Tote
☐ Drum ☐ Gallons ☐ Pounds ☐ Cu Yard

CONTAINER SIZE
_____ _____ Gal
_____ Gal _____ Cu Yd
_____ Gal _____ Tote

III. SPECIFIC HAZARDS Please identify all that apply.

Explosive	☐ Yes	☐ No	Organic Peroxide	☐ Yes	☐ No	Polymerizer	☐ Yes	☐ No
Shock Sensitive	☐ Yes	☐ No	Poison	☐ Yes	☐ No	PCB >1 ppm	☐ Yes	☐ No
Compressed Gas	☐ Yes	☐ No	Infectious	☐ Yes	☐ No			
Flammable	☐ Yes	☐ No	Carcinogen	☐ Yes	☐ No			
Pyrophoric	☐ Yes	☐ No	Radioactive	☐ Yes	☐ No			
Water Reactive	☐ Yes	☐ No	Corrosive	☐ Yes	☐ No			
Oxidizer	☐ Yes	☐ No	Dioxin or Suspect	☐ Yes	☐ No			

IV. PROCESS

Describe the process generating the waste, including raw materials and final product

☐ Unused (Attach MSDS)
☐ Used/Spent (Attach laboratory analysis)

V. WASTE COMPOSITION

Total of components must equal 100%

Components	CAS #	Average %	Range
			to
			to
			to
			to
			to
			to
			to
			to
			to
			to
			to
			to
			to
			to
			to
			to

VI. CHARACTERISTICS

Specific Gravity _____ Odor _____ Color _____

TURBIDITY

☐ Clear
☐ Cloudy ☐ Opaque

VISCOSITY

☐ Low
☐ High ☐ Medium

PHYSICAL STATE

	Percent
☐ Solid	
☐ Sludge	
☐ Liquid	
☐ Gas	

FLASHPOINT

☐ = or< 73°F ☐ 140°F - 200°F
☐ 73°F - 99°F ☐ = or> 200°F
☐ 100°F - 139°F
Exact _____

LAYERING

☐ Homogeneous
☐ Bilayered
☐ Multilayered

pH

☐ < 2 ☐ 8 to 10
☐ 2 to 4 ☐ 10 to 12 5
☐ 4 to 6 ☐ > 12 5
☐ 6 to 8
Exact _____

METALS PRESENT

			PPM
Aluminum	☐ Yes	☐ No	
Antimony	☐ Yes	☐ No	
Arsenic	☐ Yes	☐ No	
Barium	☐ Yes	☐ No	
Beryllium	☐ Yes	☐ No	
Cadmium	☐ Yes	☐ No	
Chromium	☐ Yes	☐ No	
Cobalt	☐ Yes	☐ No	
Copper	☐ Yes	☐ No	
Lead	☐ Yes	☐ No	
Maganese	☐ Yes	☐ No	
Mercury	☐ Yes	☐ No	
Nickel	☐ Yes	☐ No	
Selenium	☐ Yes	☐ No	
Silver	☐ Yes	☐ No	
Thallium	☐ Yes	☑ No	
Zinc	☐ Yes	☐ No	

VAPOR PRESSURE @ 100°F

☐ < 76 6 kPa (575 mmHg)
☐ > 76.6 kPa (575 mmHg)

Total Cyanide _____ ppm
Reactive Cyanide _____ ppm
Total Sulfide _____ ppm
Reactive Sulfide _____ ppm
TOC _____ ppm

		LOW	HIGH
BTU/lb	Range		
Ash %	Range		
Water %	Range		
Sulfur %	Range		
Chlorine %	Range		
Fluorine %	Range		
Bromine %	Range		

VII. REGULATORY INFORMATION

Texas Waste Code ☐

Is the hazardous waste determination based on the generator's detailed knowledge of the waste?	☐ Yes	☐ No
Is the hazardous waste determination based on the analysis of the waste? If yes, please attach analysis	☐ Yes	☐ No
Does this waste meet the definition of debris in 40 CFR 268 2(g)?	☐ Yes	☐ No
If this is a characteristically hazardous waste (i e , D-Coded), does it contain any underlying hazardous constituents as defined in 40 CFR 268 2(i)? If yes, identify each constituent and their percentages in Section V. Waste Composition.	☐ Yes	☐ No
Does this waste contain any of the EPCRA 313 chemicals identified in 40 CFR 372 65? If yes, list these chemicals, CAS # and their percentages in Section V. Waste Composition. http://www.epa.gov/tri/chemical/chemlist2001.pdf	☐ Yes	☐ No
Does this waste contain any of the EHS identified in section 302 of EPCRA? If yes, list these chemicals, CAS # and their percentages in Section V. Waste Composition. http://www.epa.gov/swercepp/ehs/ehsalpha.html	☐ Yes	☐ No
Is this waste regulated under the National Emissions Standard for Benzene Waste Operations (40 CFR Part 61 Subpart FF)?	☐ Yes	☐ No
Does this waste meet the definition of a wastewater (40 CFR 268 2 (f))?	☐ Yes	☐ No
Is this waste being shipped in DOT specification packages authorized for the material they contain?	☐ Yes	☐ No

EPA Hazardous Waste No.	Subcategory	EPA Hazardous Waste No.	Subcategory

Shipping Name _____ Additional Descriptors _____

Technical Names _____

Hazard Class ☐ UN/NA Number ☐ Packing Group ☐ RQ ☐

VII. GENERATOR'S CERTIFICATION

I hereby certify that the information identified above and attached to this profile is complete and accurate to the best of my knowledge and ability to determine that no omissions of composition or properties exist and that all known or suspected hazards have been disclosed I also understand it is my responsibility to properly identify and classify my waste in in accordance with USEPA US DOT and State regulations

_____ _____

GENERATOR'S NAME **TITLE**

_____ _____

SIGNATURE **DATE**

SET Environmental, Inc.
5738 Cheswood Street - Houston, TX 77087
713-645-8710 // 800-598-7328 // Fax: 713-649-1027

NOTIFICATION FOR WASTE RESTRICTED FROM LAND DISPOSAL

I. GENERAL INFORMATION

GENERATOR _____
MAILING ADDRESS _____
CITY, STATE ZIP _____

U.S. EPA ID No: _____

State Manifest Document Number: _____

Manifest Document Number: _____

II. LAND DISPOSAL RESTRICTION TABLE

Approval Number	RCRA Waste Code	Subcategory Codes (From Table I)	F-Solvent (Table II) or UHC Codes (Table III)	Treatability Group (WW) or (NWW)

III. CERTIFICATION

I am supplying this notification to SET Environmental, Inc. in accordance with the provisions of 40 CFR 268.7. I have determined that the material described above is restricted from land disposal and must be treated to conformance with the treatment standards specified in 40 CFR 268.40 and 268.48.

I hereby certify that all information supplied above is complete and accurate to the best of my knowledge and ability to determine that no omissions or errors exist.

SIGNATURE _____ TITLE _____

NAME (Printed or Typed) _____ DATE _____

Copy Distribution: One copy to T1; One copy to Generator ;

TABLE I - WASTE CODE SUBCATEGORIES

Code	A	B	C	D	E
D001	High TOC ignitable characteristic liquids.	All other ignitable characteristic waste.			
D003	Reactive cyanides	Reactive sulfides	Explosives	Water reactives	Other Reactives
D006	Cadmium containing batteries				
D008	Lead acid batteries				
D009	High Mercury - Organic (Nonwastewaters)	High Mercury - Inorganic (Nonwastewaters)	Low Mercury (Nonwastewaters)	Mercury Containing Wastewaters	
P047	4,6-Dinitro-o-cresol	4,6-Dinitro-o-cresol salts			
P065 & P092	Non-incinerator or non-RMERC residues.	Incinerator or RMERC residues with ≥ 260 mg/kg total mercury.	RMERC residues with < 260 mg/kg total mercury.	Incinerator residues with < 260 mg/kg total mercury.	All wastewaters
U151	High mercury	RMERC residues with < 260 mg/kg total mercury.	Non-RMERC residues with < 260 mg/kg total mercury.	All wastewaters.	
U240	2,4-Dichlorophenoxyacetic acid	2,4-Dichlorophenoxyacetic acid salts and esters.			
F003 & F005	Waste that contain only the F-listed solvents Carbon disulfide, Cyclohexanone and/or Methanol.	Wastes that contain only the F-listed solvent 2-Nitropropane.	Wastes that contain only the F-listed solvent 2-Ethoxyethanol.		

TABLE II - F CODE SOLVENT CONSTITUENTS

Code	Constituent	Code	Constituent	Code	Constituent	Code	Constituent	Code	Constituent
5	Acetone	11	Cresol (o, m, or p isomers)	17	Ethyl ether	23	Nitrobenzene	29	1,1,2-Trichloro-1,2,2-trifluoroethane
6	Benzene	12	Cresylic acid	18	Isobutanol	24	Pyridine		
7	n-Butyl alcohol	13	Cyclohexanone	19	Methanol	25	Tetrachloroethylene	30	Trichloroethylene
8	Carbon disulfide	14	1,2-Dichlorobenzene	20	Methylene chloride	26	Toluene	31	Trichlorofluoromethane
9	Carbon tetrachloride	15	Ethyl acetate	21	Methyl ethyl ketone	27	1,1,1-Trichloroethane	32	Xylene
10	Chlorobenzene	16	Ethyl benzene	22	Methyl isobutyl ketone	28	1,1,2-Trichloroethane		

TABLE III - UNIVERSAL TREATMENT STANDARDS
(Underlying Hazardous Constituents (UHC)

33	Acenaphthylene
34	Acenaphthene
35	Acetone
36	Acetonitrile
37	Acetophenone
38	2-Acetylaminofluorene
39	Acrolein
40	Acrylamide
41	Acrylonitrile
251	Aldicarb sulfone
42	Aldrin
43	4-Aminobiphenyl
44	Aniline
45	Anthracene
46	Aramite
47	alpha-BHC
48	beta-BHC
49	delta-BHC
50	gamma-BHC (Lindane)
252	Barban
254	Bendiocarb
255	Benomyl
51	Benzene
52	Benz(a)anthracene
53	Benzal chloride
54	Benzo(b)fluoranthene
55	Benzo(k)fluoranthene
56	Benzo(g,h,i)perylene
57	Benzo(a)pyrene
58	Bromodichloromethane
59	Methyl bromide
60	4-Bromophenyl phenyl ether
61	n-Butanol
62	Butyl benzyl phthalate
63	2-sec-Butyl-4,6-dinitrophenol
256	Butylate
257	Carbaryl
258	Carbenzadim
260	Carbofuran
259	Carbofuran phenol
64	Carbon disulfide
65	Carbon tetrachloride
261	Carbosulfan
66	Chlordane (alpha and gamma isomers)
67	p-Chloroaniline
68	Chlorobenzene
69	Chlorobenzilate
70	2-Chloro-1,3-butadiene
71	Chlorodibromomethane
72	Chloroethane
73	bis(2-Chloroethoxy)methane
74	bis(2-Chloroethyl)ether
75	Chloroform
76	bis(2-Chloroisopropyl)ether
77	p-Chloro-m-cresol
78	2-Chloroethyl vinyl ether
79	Chloromethane
80	2-Chloronaphthalene
81	2-Chlorophenol
82	3-Chloropropylene
83	Chrysene
84	o-Cresol
85	m-Cresol
86	p-Cresol
262	m-Cumyl methylcarbamate
87	Cyclohexanone
88	1,2-Dibromo-3-chloropropane
89	Ethylene dibromide
90	Dibromomethane
91	2,4-Dichlorophenoxyacetic acid
92	o,p'-DDD
93	p,p'-DDD
94	o,p'-DDE
95	p,p'-DDE
96	o,p'-DDT
97	p,p'-DDT
98	Dibenzo(a,h)anthracene
99	Dibenz(a,e)pyrene
100	m-Dichlorobenzene
101	o-Dichlorobenzene
102	p-Dichlorobenzene
103	Dichlorodifluoromethane
104	1,1-Dichloroethane
105	1,2-Dichloroethane
106	1,1-Dichloroethylene
107	trans-1,2-Dichloroethylene
108	2,4-Dichlorophenol
109	2,6-Dichlorophenol
110	1,2-Dichloropropane
111	cis-1,3-Dichloropropylene
112	1,3-Dichloropropylene, trans
113	Dieldrin
114	Diethyl phthalate
115	2,4-Dimethylphenol
116	Dimethyl phthalate
117	Di-n-butyl phthalate
118	1,4-Dinitrobenzene
119	4,6-Dinitro-o-cresol
120	2,4-Dinitrophenol
121	2,4-Dinitrotoluene
122	2,6-Dinitrotoluene
123	Di-n-octyl phthalate
124	p-Dimethylaminoazobenzene
125	Di-N-propylnitrosamine
126	1,4-Dioxane
127	Diphenylamine
128	Diphenylnitrosamine
129	1,2-Diphenylhydrazine
130	Disulfoton
265	Dithioncarbamates
131	Endosulfan I
132	Endosulfan II
133	Endosulfan Sulfate
134	Endrin
135	Endrin Aldehyde
266	EPTC
136	Ethyl acetate
137	Ethyl cyanide (Propanenitrile)
138	Ethyl benzene
139	Ethyl ether
140	bis(2-Ethylhexyl) phthalate
141	Ethylmethacrylate
142	Ethylene oxide
143	Famphur
144	Fluoranthene
145	Fluorene
267	Formetanate hydrochloride
146	Heptachlor
147	Heptachlor epoxide
148	Hexachlorobenzene
149	Hexachlorobutadiene
150	Hexachlorocyclopentadiene
151	HxCDDs (All hexachlorodibenzo-p-dioxins)
152	HxCDFs (All Hexachlorodibenzo-furans)
153	Hexachloroethane
154	Hexachloropropylene
155	Indeno (1,2,3-c,d) pyrene
156	Iodomethane
157	Isobutyl alcohol
158	Isodrin
159	Isosafrole
160	Kepone
161	Methacrylonitrile
162	Methanol
163	Methapyrilene
270	Methiocarb
271	Methomyl
164	Methoxychlor
165	3-Methylcholanthrene
166	4,4-Methylene-bis-(2-chloroaniline)
167	Methylene chloride
168	Methyl ethyl ketone
169	Methyl isobutyl ketone
170	Methyl methacrylate
171	Methyl methansulfonate
172	Methyl parathion
272	Metolcarb
273	Mexacarbate
274	Molinate
173	Naphthalene
174	2-Naphthylamine
175	o-Nitroaniline
176	p-Nitroaniline
177	Nitrobenzene
178	5-Nitro-o-toluidine
179	o-Nitrophenol
180	p-Nitrophenol
181	N-Nitrosodiethylamine
182	N-Nitrosodimethylamine
183	N-Nitroso-di-n-butylamine
184	N-Nitrosomethylethylamine
185	N-Nitrosomorpholine
186	N-Nitrosopiperidine
187	N-Nitrosopyrrolidine
275	Oxamyl
188	Parathion
276	Pebulate
189	PCBs, Total (sum of all PCB isomers, or all Aroclors
190	Pentachlorobenzene
191	PeCDDs (All pentachlorodibenzo-p-dioxins)
192	PeCDFs (All Pentachlorodibenzo-furans)
193	Pentachloroethane
194	Pentachoronitrobenzene
195	Pentachlorophenol
196	Phenacetin
197	Phenanthrene
198	Phenol
199	Phorate
200	Phthalic acid
201	Phthalic anhydride
279	Physostigmine salicylate
278	Physostigmine
280	Promecarb
202	Pronamide
281	Propham
282	Propoxur
283	Prosulfocarb
203	Pyrene
204	Pyridine
205	Safrole
206	Silvex
207	2,4,5-Trichlorophenoxyacetic acid
208	1,2,4,5-Tetrachlorobenzene
209	TCDDs (All Tetrachlorodibenzo-p-dioxins)
210	TCDFs (All tetrachlorodibenzo-furans)
211	1,1,1,2-Tetrachloroethane
212	1,1,2,2-Tetrachloroethane
213	Tetrachloroethylene
214	2,3,4,6-Tetrachlorophenol
284	Thiodicarb
285	Thiophanate-methyl
215	Toluene
216	Toxaphene
287	Triallate
217	Tribromomethane
288	2,4,6-Tribromophenol
218	1,2,4-Trichlorobenzene
219	1,1,1-Trichloroethane
220	1,1,2-Trichloroethane
221	Trichloroethylene
222	Trichlorofluoromethane
223	2,4,5-Trichlorophenol
224	2,4,6-Trichlorophenol
225	1,2,3-Trichloropropane
226	1,1,2-Trichloro-1,2,2-trifluoroethane
289	Triethylamine
227	2,3-tris-(Dibromopropyl) phosphate
290	Vernolate
228	Vinyl chloride
229	Xylene mixed isomers

Inorganic Constituents

230	Antimony
231	Arsenic
232	Barium
233	Beryllium
234	Cadmium
235	Chromium [Total]
236	Cyanides (Total)
237	Cyanides (Amenable)
239	Lead
240	Mercury-Nonwastewater from retort
241	Mercury (All others)
242	Nickel
244	Silver
246	Thallium

249 None Apply

SHIPMENT SCHEDULING REQUEST FORM

Customer Name & Contact Name: _____ **Contact Phone No:** _____

Transporter: _____ **Van or Load No:** _____

SET to Arrange Transportation? ☐ **Yes** ☐ **No** **Requested Receiving Date:** _____ **Requested ETA:** _____

Generator Name	**SITE Address** (Street Address, City, State)	**Profile No.**	**Waste Name or** Lab Pack/Cylinder No.	**No. of Drums**	**Drum Size**	**Manifest Number** (If Known)
			Subtotal Of Drums:	0		

Email or Fax this form to Darnell Hodge: 713-649-6022 (fax), 713-641-7557 (direct line) dhodge@setenv.com

SHIPMENT SCHEDULING REQUEST FORM
CONTINUATION PAGE

Customer Name & Contact Name: 0

Transporter: 0 **Van or Load No:** 0

Generator Name	SITE Address (Street Address, City, State)	Profile No.	Waste Name or Lab Pack/Cylinder No.	No. of Drums	Drum Size	Manifest Number (If Known)
			Total	0		

Email or Fax this form to Darnell Hodge: 713-649-6022 (fax), 713-641-7557 (direct line) dhodge@setenv.com