

Clean Harbors La Porte, LLC 500 Independence Parkway South La Porte, Texas 77571 281.884.5500 www.cleanharbors.com

August 21, 2020

Sent via Fed Ex & eMail

Gulay Aki, P.E., Section Manager (MC 130) Industrial & Hazardous Waste Permits Section Waste Permits Division Texas Commission on Environmental Quality 12100 Park 35 Circle, Building F Austin, Texas 78753 (512) 239-1000 EunJu.Lee@tceq.texas.gov

Re: Facility Response to Technical Notice of Deficiency Letter

Clean Harbors La Porte, LLC La Porte, Harris County, Texas

Hazardous Waste Permit Number: 50225 Industrial Solid Waste Number: 50225

Tracking No. 2521390; RN102949021/CN603661844 Permit Renewal/Minor Amendment to the Permit

Dear Ms. Aki:

Please allow this correspondence to serve as the referenced facility's response to TCEQ's Technical Notice of Deficiency received via email on 7/16/2020 and 7/22/2020. The format of this response provides a table (see Enclosure) that outlines the information requested by TCEQ relative to this matter in the stipulated manner.

This response is being emailed to the attention of Eun Ju Lee, with the original and three (3) hardcopies being sent to TCEQ as instructed in the letter that accompanied the list of TNODs.

Please contact me at <u>desha.david@cleanharbors.com</u> or (423) 413-1218 with any questions or comments you have concerning this matter.

Sincerely.

David A. DeSha

Sr. Environmental Compliance Manager Clean Harbors Environmental Services, Inc.

cc: Steve Venti – Clean Harbors La Porte, LLC (w/o attachments)

Facility File



Enclosure



CORRESPONDENCE COVER SHEET WASTE PERMITS DIVISION TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Date: 8/21/2020 Facility Name: Clean Harbors La Porte, LLC Permit or Registration No.: 50225 *If Response/Revision, please provide previous TCEQ Trace	_	
(Previous TCEQ Tracking No. can be found in the Subject li	ne of	the TCEQ's response letter to your original submittal.)
This cover sheet should accompany all correspondence be affixed to the front of your submittal as a cover page correspondence being submitted. For questions regard at (512) 239-2335.	e. Ple	ease check the appropriate box for the type of this form, please contact the Waste Permits Division
Table 1 - Muni APPLICATIONS	Стра	REPORTS and RESPONSES
New Notification		Closure Report
	┵┝	Groundwater Alternate SRC Demonstration
New Permit (including Subchapter T)	- -	Groundwater Corrective Action
New Registration (including Subchapter T)	<u> </u>	
Major Amendment	┵┝	Groundwater Monitoring Report
Minor Amendment	-	Groundwater Statistical Evaluation
Limited Scope Major Amendment		Landfill Gas Corrective Action
Notice Modification		Landfill Gas Monitoring
Non-Notice Modification		Liner Evaluation Report
Transfer/Name Change Modification	<u> </u>	Soil Boring Plan
Temporary Authorization		Special Waste Request
Voluntary Revocation	L	Other:
Subchapter T Workplan		
Other:		
Table 2 - Industria	1&1	Hazardous Waste
APPLICATIONS		REPORTS and RESPONSES
New		Annual/Biennial Site Activity Report
Renewal		CfPT Plan/Result
Post-Closure Order		Closure Certification/Report
Major Amendment	Ī	Construction Certification/Report
Minor Amendment		CPT Plan/Result
Class 3 Modification		Extension Request
Class 2 Modification	┪	Groundwater Monitoring Report
Class 1 ED Modification		Interim Status Change
Class 1 Modification	┪╴	Interim Status Closure Plan
Endorsement	╅	Soil Core Monitoring Report
Temporary Authorization	Ħ	Treatability Study
Voluntary Revocation		Trial Burn Plan/Result
335.6 Notification	┪┝	Unsaturated Zone Monitoring Report
Other:	┧┝	Waste Minimization Report
		Other: T NOD

TCEQ-20714 (11-23-15)
Page 1 of 1

ID ^[1]	App. Part	App. Sectio n	Location ¹	Citation	Error Type ^[3]	Deficiency Description/Resolution	Facility Response
Т1	A	I.A & I.H	Page 1 & Section III.22	Core Date Form (TCEQ - 10400) Instructions	Incorrect	Correct regulated entity name.	See Attachment 1 which provides a replacement for the Core Data Form in the application Parts A (after Signatory Page) & B (before Signatory Page).
T2	В	I	Table I-1	Part B Instructions	Incomplete	Include all changes for which modifications are requested.	See Attachment 2 which provides a replacement for Table I-1.
Т3	В	V.A	Page 3 & Overall Facility Map		Inconsistent	Explain why southwest portion of the facility was not surrounded by fencing on the facility map.	Southwest portion of facility is surrounded by fencing. Overall Facility Plan revised to show fence at questioned point. See Attachment 3 which provides a replacement for the Overall Facility Plan in the application's Parts A (i.e., in associated Attachment C) & B.
T4	В	V.A	Overall Facility Plan		Incomplete	Depict proposed units, chemical treatment tank, R-2 and cylinder unit 2 at warehouse III and explain why Class 2 dumpster (NOR #2) is shown at 2 locations.	Proposed units R-2 and cylinder unit 2 removed from permit application – i.e., will not be constructed. 2 nd dumpster location revised as NOR #037. See Attachment 3 which provides a replacement for the Overall Facility Plan in the application's Parts A & B.

Deficiency ID – Key: A#=Administrative deficiency (ex. A12); T#=Technical deficiency relating to Sections I-X and Sections XII-XIII of the Part B application (ex. T10); C#=Comment only (ex. C1); CP#=Technical deficiency relating to Section XI-Compliance Plan of the Part B application (ex. CP14); Number in parenthesis (n) = nth instance of same deficiency (ex. T1(2) is the second instance of deficiency T1 originally identified in previous NOD).

^[2] Location of deficiency in submittal/application. Items in square brackets [] refer to applicant's supplemental information submitted as attachments to the application form.

 $^{^{\}scriptscriptstyle{[3]}} \ Possible \ Error \ Types: Ambiguous, Incomplete, Inconsistent, Incorrect, Omitted, Typo, or Format.$

Т5	В	V.A	Other Maps (Plot, Traffic, and Topo)		Incomplete	Correct scale & depict proposed outdoor container storage area, chemical treatment tank (R-2) and cylinder release unit 2 at warehouse III as stated in Section V.K (page V.K.ii-4).	Proposed units R-2 and cylinder unit 2 removed from permit – will not be constructed. Outdoor Bulk Storage Area added to the Plot Plan and Site Plan Facility Traffic Patterns. New Topographic Site Plans drafted for ANOD response revised accordingly. See Attachment 4 which provides replacements for the Plot Plan and Site Plan Facility Traffic Patterns as well as the new and revised Topographic Site Plans.
Т6	В	V.A	Page 7	30 TAC 305.149	Incomplete	Specify construction schedule for outdoor container storage area.	See Attachment 5 which provides a replacement for Page 7 in V.A.
Т7	В	V.A	Table V.A		Incomplete	Include capacity unit and revise capacity for chemical reactor tank R-1 (NOR No. 26) to match with Engineering Report R-1 (page V.C.i-2). Additionally, include storage area dimensions for bulk container storage area (NOR No. 33) in unit description and capacities for cylinder release units 1 and 2.	See Attachment 6 which provides a replacement for Table V.A.
Т8	В	V.B.iv	Page 2	40 CFR 270.14	Incomplete	Provide design or proposed construction details for outdoor container storage area as stated.	See Attachment 7 which provides a replacement for Page V.B.iv-2.
Т9	В	V.C.iii		40 CFR 270.14	Incomplete	Provide design/engineering plan for proposed chemical reactor tanks R-2 & R-1A and include information in tank shell thickness summary table for R-2 (page 6).	Proposed increase for R-1A and proposed units R-2 and cylinder unit 2 removed from permit application – i.e., will not be constructed. Remove entire Section V.C.iii from the application.

T10	В	V.C & V.K		30 TAC 305.149	Incomplete	Provide construction schedule for proposed units (R-2 and Cylinder 2) and replacement information for Reaction Tank R-1A.	Proposed increase for R-1A and proposed units R-2 and cylinder unit 2 removed from permit application – i.e., will not be constructed. Remove Sections V.C.iii and V.K.ii from the application and replace Pages V.C.ii-2 and V.C.ii-15 as well as Tables V.C and V.K with those herein Attachment 8 .
T11	В	V.K		40 CFR 270.14	Incomplete	Provide specifications for cylinder release units.	See Attachment 8 which provides a replacement for Table V.K.
T12	В	V.B	Drawings (67LT- 7200-501 & 502)		Inconsistent	Warehouse II dimensions (76x189) with Tables V.A & V.B.	See Attachment 9 which provides a replacement for Table V.B.
T13	В	V.B	Table V.B & Page V.B.iv-2		Inconsistent	Capacity (18775 gallons) for outdoor Container Storage Area (NOR No. 033) with Table V.A.	See Attachment 9 which provide a replacement for Table V.B. See Attachment 7 which provides a replacement for Page V.B.iv-2.
T14	В	V.B	Table V.B		Incomplete	Add footnote for superscripts and ignitable waste for CSA 1 & 2 that was mentioned on pages V.B.i-2 and ii-2.	See Attachment 9 which provides a replacement for Table V.B.
T15	В	V.K	Table V.K		Incomplete	Include capacity and dimensions.	See Attachment 8 which includes a replacement for Table V.K.
T16	В	VII.A	Table VII.A		Incomplete	Add footnote and correct methods of decontamination for waste treatment tanks and miscellaneous area.	See Attachment 10 which provides a replacement for Table VII.A.
T17	В	VII.A	Page VII.A-7		Incorrect	Correct company name.	See Attachment 11 which provides a replacement for Page VII.A-4 (as discussed Page VII.A-7 was not the subject of this TNOD).

T18	В	VII	Sections 3.0 & 4.0 and Table VII.D	Technical Guideline No. 10	Incomplete	SWMUs in closure plan, complete closure cost estimate for cylinder release units 1 & 2 and proposed R-1A. Update Tables VII.D. and VII.E.1 as necessary.	Proposed increase for R-1A and proposed units R-2 and cylinder unit 2 removed from permit application – i.e., will not be constructed. See Attachment 12 which provides replacements for Page VII.A-15, Table VII.B (Table VII.D is reserved) Pages VII.B.1-4 through VII.B.1-6 and Table VII.E.1.
FA1	В	VIII	Section VIII	30 TAC 305.50(a)(4)	Incomplete	company's financial capability, you will need to complete the Financial Disclosure Letter relating to permit	The required Financial Disclosure Statement was/is included in the 5/29/2020 permit application. Please refer to Attachment VIII.B.1 in Section VIII. of the application.

TCEQ TNOD (7-22-2020)

ID ^[1]	App. Part	App. Section	Location ^[2]	Citation	Error Type ^[3]	Deficiency Description/Resolution	Facility Response
T19	В	III.D.1.	Page III.D- 26 through III.D-30, Section III		Incomplete	heading.	See Attachment 13 which provides replacements for Page III.D-26 through III.D-30 for Table III.D.
T20	В	IV.A.~.	Page IV.A- 1, Section IV	305.50(a)(9)	Omitted	Revise to N/A: Table IV.A. is for either a new facility or capacity expansion. Any expansion would be processed as a separate Class 3 Modification.	See Attachment 14 which provides Table IV.A marked N/A.
T21	В	IV.B.	Page IV.B- 1, Section IV	335.501- 335.515; 261.21- 261.24; 261.30- 261.33	Comment Only		See Attachment 15 which provides replacements for Page IV.B-1 of Table IV.B.

^[1] Deficiency ID – Key: A#=Administrative deficiency (ex. A12); T#=Technical deficiency relating to Sections I-X and Sections XII-XIII of the Part B application (ex. T10); C#=Comment only (ex. C1); CP#=Technical deficiency relating to Section XI-Compliance Plan of the Part B application (ex. CP14); Number in parenthesis (n) = nth instance of same deficiency (ex. T1(2) is the second instance of deficiency T1 originally identified in previous NOD).

^[2] Location of deficiency in submittal/application. Items in square brackets [] refer to applicant's supplemental information submitted as attachments to the application form.

 $^{^{\}tiny{\texttt{[3]}}}\ Possible\ Error\ Types:\ Ambiguous,\ Incomplete,\ Inconsistent,\ Incorrect,\ Omitted,\ Typo,\ or\ Format.$

T22	В	IV.C.	Page IV.C- 1, Section IV	264.13(a), (b)(1-4), and (c)(2); 261 Appendix I; 261 Appendix II; 261 Appendix III; or any sampling method approved by EPA; 264.13(b)(5-8)	Comment Only	Use footnotes for the short explanations added to various rows/columns. The explanations are redundant and distract from the sampling location, method, and parameters; example "See WAPCertain test methods have been modified as indicated in the WAP" & "These are the primary sampling locations only." etc.	See Attachment 16 which provides a replacement for Page IV.C-1 of Table IV.C.
							See Attachment 17 for a replacement Table III-2, Attachment D cover and associated Photos 13-15 (i.e., now Photos 13-14) in the application's Part A.
							See Attachment 18 for a replacement signatory page for the subject permit application's Part A.
							See Attachment 19 for a replacement signatory page for the subject permit application's Part B.
							See Attachment 20 the facility's letter of request to remove a proposed WMU and upgrade to an existing WMU to be inserted into Section V.





TCEQ Use Only

TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION	I: Gen	eral Inforn	nation								
1. Reason fo	r Submis	sion (If other is o	hecked please	describe	in space p	rovid	ed.)				
☐ New Per	mit, Regis	tration or Author	ization (Core E	ata Form	should be	subm	itted wit	h the	program applicatio	n.)	
⊠ Renewa	(Core Da	nta Form should b	e submitted w	ith the ren	newal form)	□ 0	ther			
2. Customer	Reference	e Number (if iss	iued)	Follow thi	is link to sea	arch	3. Reg	ulate	d Entity Reference	e Number (if issued)
CN 6036	61844			for CN or	RN number al Registry*	rs in	RN	102	949021		
SECTION	II: Cu	stomer Info	ormation								
4. General C				Date for	Customer	Infor	mation	Upda	ntes (mm/dd/yyyy)	05/29	/2020
	 □ New Customer □ Change in Regulated Entity Ownership □ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts) 								Entity Ownership		
											active with the
										irent and	acuve with the
		f State (SOS)				IDIIC					F . F .
6. Customer	Legal Na	me (If an individua	l, print last name	e first: eg: L	Doe, John)		<u>If r</u>	ew C	ustomer, enter previ	ious Custom	er below:
Clean Har	bors La	Porte, LLC									
7. TX SOS/CI	PA Filing	Number	8. TX State	Tax ID (11	digits)		9.	Fede	ral Tax ID (9 digits)		S Number (if applicable)
00100689	06		10426989	9991			48	126	3744	15779	36
11. Type of C	Customer	: ⊠ Corporat	ion	☐ Individual				Partnership:			
Government:	☐ City ☐	County 🔲 Federal 🛭	☐ State ☐ Other		Sole P	roprie	torship		Other:		
12. Number o	of Employ 21-100	/ees 101-250	251-500	<u></u>	1 and high	er	13	Inde Yes	ependently Owned Mo	and Opera	ited?
14. Custome	r Role (Pr	oposed or Actual) -	- as it relates to	the Regula	ated Entity li	sted or	n this for	n. Ple	ase check one of the	following	
☐Owner ☐Occupation	nal Licens	Opera	tor onsible Party		Owner & Voluntary	•		olican	t Other:		
	500 In	dependence	Parkway S	outh	,						
15. Mailing	000 11	- P									
Address:	City	La Porte		Stat	e TX		ZIP	77:	571	ZIP + 4	9768
16. Country		formation (if outs	ide USA)			17. [E-Mail A	ddre	SS (if applicable)		
	3	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,									
18. Telephon	e Numbe	ra na sa sa sa		19. Exte	ension or (Code			20. Fax Number	r (if applicat	ble)
(281) 88				5519					()		
SECTION	III. D	egulated E1	tity Info	matio	n						
						electe	helow	thic fi	orm should be acco	mnanied hy	a permit application)
New Regu			to Regulated						d Entity Information		a portini application
									CEQ Agency D		lards (removal
		endings such				-, 40	10 1110				
		lame (Enter name				is takir	ng place.)	ĪġĪ			
Clean Har	bors La	Porte									

23. Street Address of	500 Inc	lependence l	Parkway Sout	h					
the Regulated Entity: (No PO Boxes)	City	La Porte	State	TX	ZIP	77571	ZIP + 4	9768	
24. County	Harris								
		Enter Physical I	Location Descrip	tion if no st	reet addre	ss is provided.			
25. Description to Physical Location:	500 Ind	lependence I	Parkway Sout	h					
26. Nearest City						State	Nea	rest ZIP Code	
La Porte						TX	77:	571	
27. Latitude (N) In Decir	nal:	4		28.	Longitude	(W) In Decimal:			
Degrees	Minutes		Seconds	Degr	ees	Minutes		Seconds	
29		42	24.30		95		05	28.70	
29. Primary SIC Code (4	digits) 30	. Secondary SI	C Code (4 digits)	31. Prima (5 or 6 digi	ary NAICS		econdary NA digits)	ICS Code	
4953	226		562211	1	493	110			
33. What is the Primary	Business	of this entity?	(Do not repeat the Si	C or NAICS de	scription.)				
Hazardous/non-haz						age/treatment	& distribut	ion center	
34. Mailing			50	00 Independ	dence Park	way South			
Address:	City	La Porte	State	TX	ZIP	77571	ZIP+4	9768	
35. E-Mail Address									
36. Teleph	one Numbe	er	37. Extens	ion or Code		38. Fax Nu	mber (if appl	icable)	
. TCEQ Programs and I			ns and write in the p	519 permits/registr	ation number	rs that will be affected) - by the updates	submitted on this	
m. See the Core Data Form								I Hazardous Wast	
Dam Safety	Distric	CIS	☐ Edwards Ad	quirer	LIEMIS	Emissions Inventory Air		☐ Industrial Hazardous Wast	
Municipal Colid Monto	Now 6	Source Review Air	OSSF		□ Potro	leum Storage Tank	50225 ⊠ PWS		
Municipal Solid Waste						leum Storage Fank			
50225 Sludge		Multiple 1 Water	☐ Title V Air		☐ Tires		1012759 ⊠ Used Oil		
_1 Oldage		1 1100	La rido v rin				A85635		
☐ Voluntary Cleanup	☐ Waste	e Water	☐ Wastewater	Agriculture	☐ Wate	r Rights	✓ Other:		
							TXD9822	90140	
ECTION IV: Pro	eparer I	nformation	<u>n</u>		<u> </u>				
0. David DeSh	a			41. Title	s: Sr.	Environmental	Complian	ce Mgr	
2. Telephone Number	43. Ext./Co	de 44. Fa	ax Number	45. E-I	Mail Addres	3S			
423) 413-1218		() -	desha	a.david@	cleanharbors.	com		
ECTION V: Au	thorized	Signature	<u> </u>	1					
By my signature below nature authority to submentified in field 39.	, I certify, to	o the best of my	- knowledge, that tl						
	Harbors La	a Porte, LLC		Job Tit	le: Sr	Environmental Con	npliance Mana	ger	
	LA. DeSha		1/	1000116	01.	Phone:	(423) 413-		



Permittee: Clean Harbors La Porte, LLC

Page 1 of 1

Table I.1-Description of Proposed Application Changes

Permit/Compliance	Brief Description of	Modification or Amendment Type	Supporting Regulatory Citation
Plan Application Appendix/Section	Proposed Change	Amenament Type	Citation
Application Parts A	Updates for all	Renewal/Minor	30 TAC
and B as well as	Sections for current	Amendment	§305.42, 305
supporting	renewal date.		Subchapter D
documentation	Revisions to applicable		
uocumentudon	Sections for:		
	The removal of		
	permitted but		
	not		
	constructed		
	waste		
	management		
	unit Cylinder		
	Release Unit 2		
	(Permit Unit		
	#028, NOR		
	#032; and		
	 The removal of 	¥7	
	proposed 1500		
	gallon		
	replacement		
	for Tank R-1A		
	(Permit Unit		
	#025, NOR		
	#027 but retain		
	the currently		
	permitted/inst		
	alled 500		
	gallon Tank R-		
	<u>1A.</u>		
	Updates and		
	corrections only for		
	renewal application -		
	i.e., no changes to		
	permitted hazardous		
	waste management		
	units		

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TCEQ Part B Application TCEQ-00376

 $\mbox{Revision No.} \quad \frac{\theta 1}{}$ $\mbox{Revision Date } \frac{\mbox{May 29August 21}}{\mbox{Page I.1.1-1 of Page I.1.1-1}} \label{eq:Revision}$

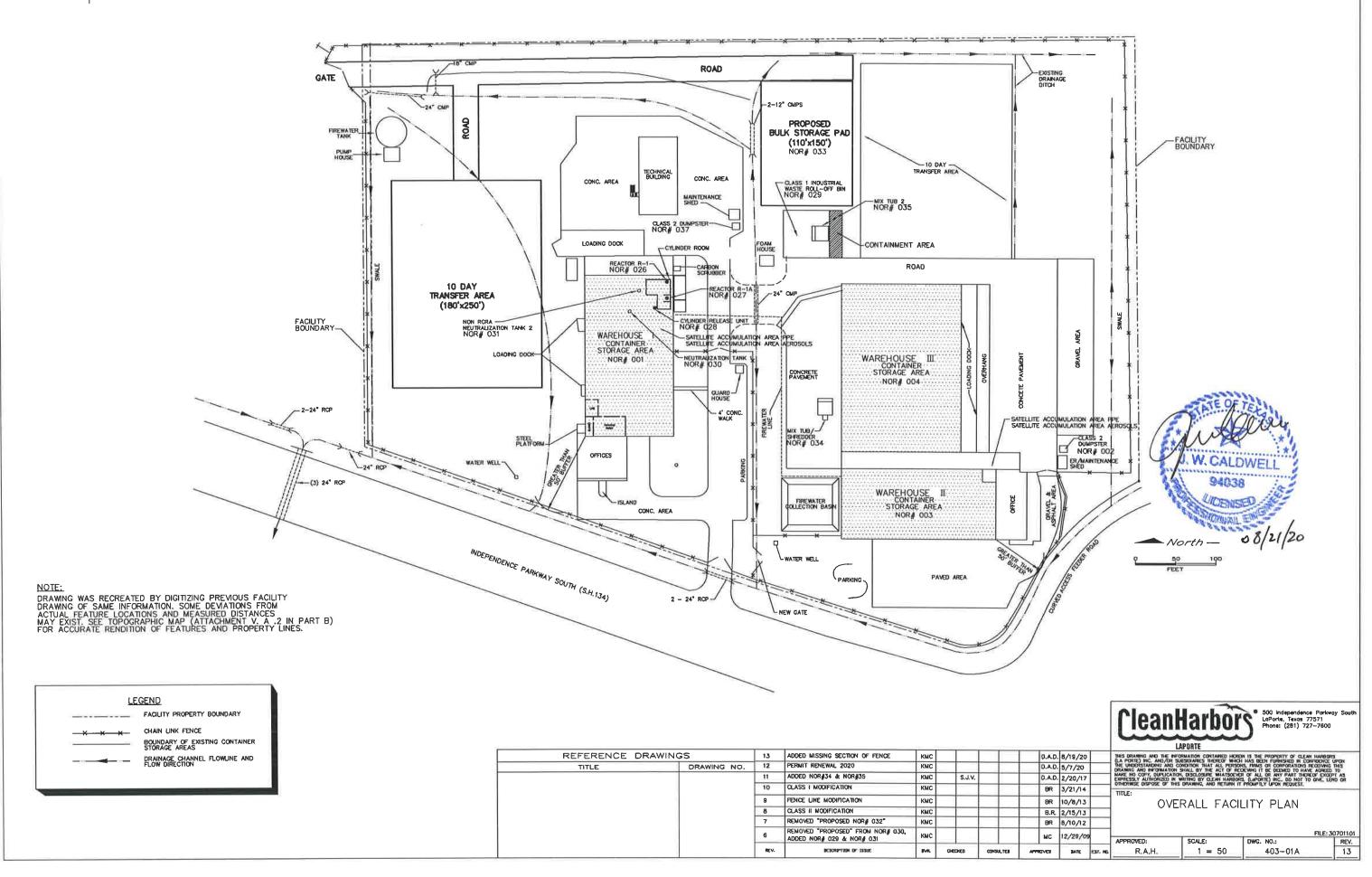
Permittee: Clean Harbors La Porte, LLC Page 1 of 1

Table I.1-Description of Proposed Application Changes

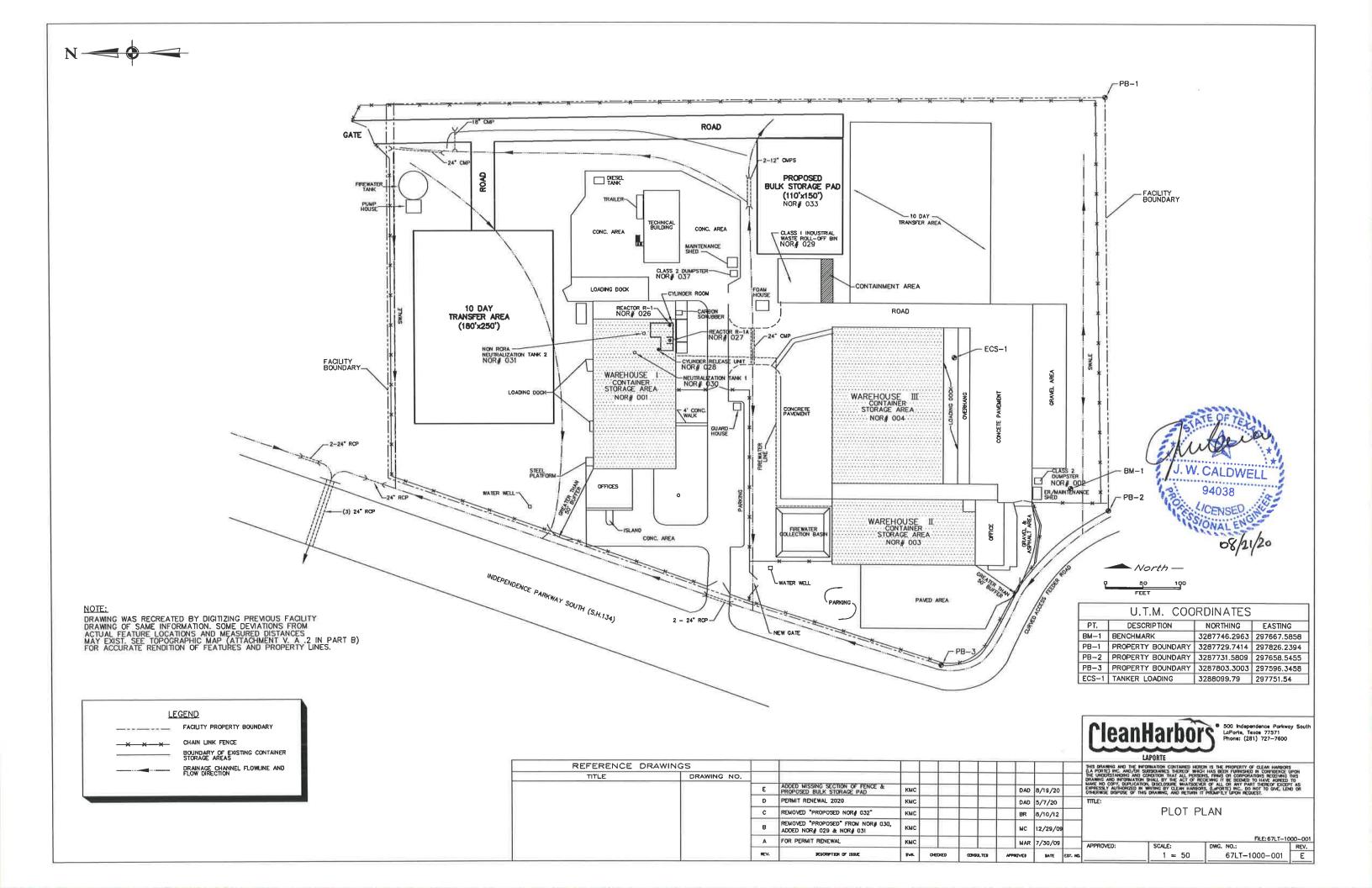
Permit/Compliance Plan Application Appendix/Section	Brief Description of Proposed Change	Modification or Amendment Type	Supporting Regulatory Citation
Application Parts A and B as well as supporting documentation	Updates for all Sections for current renewal date. Revisions to applicable Sections for: • The removal of permitted but not constructed waste management unit Cylinder Release Unit 2 (Permit Unit #028, NOR #032; and • The removal of proposed 1500 gallon replacement for Tank R-1A (Permit Unit #025, NOR #027 but retain the currently permitted/inst alled 500 gallon Tank R-1A.		30 TAC §305.42, 305 Subchapter D

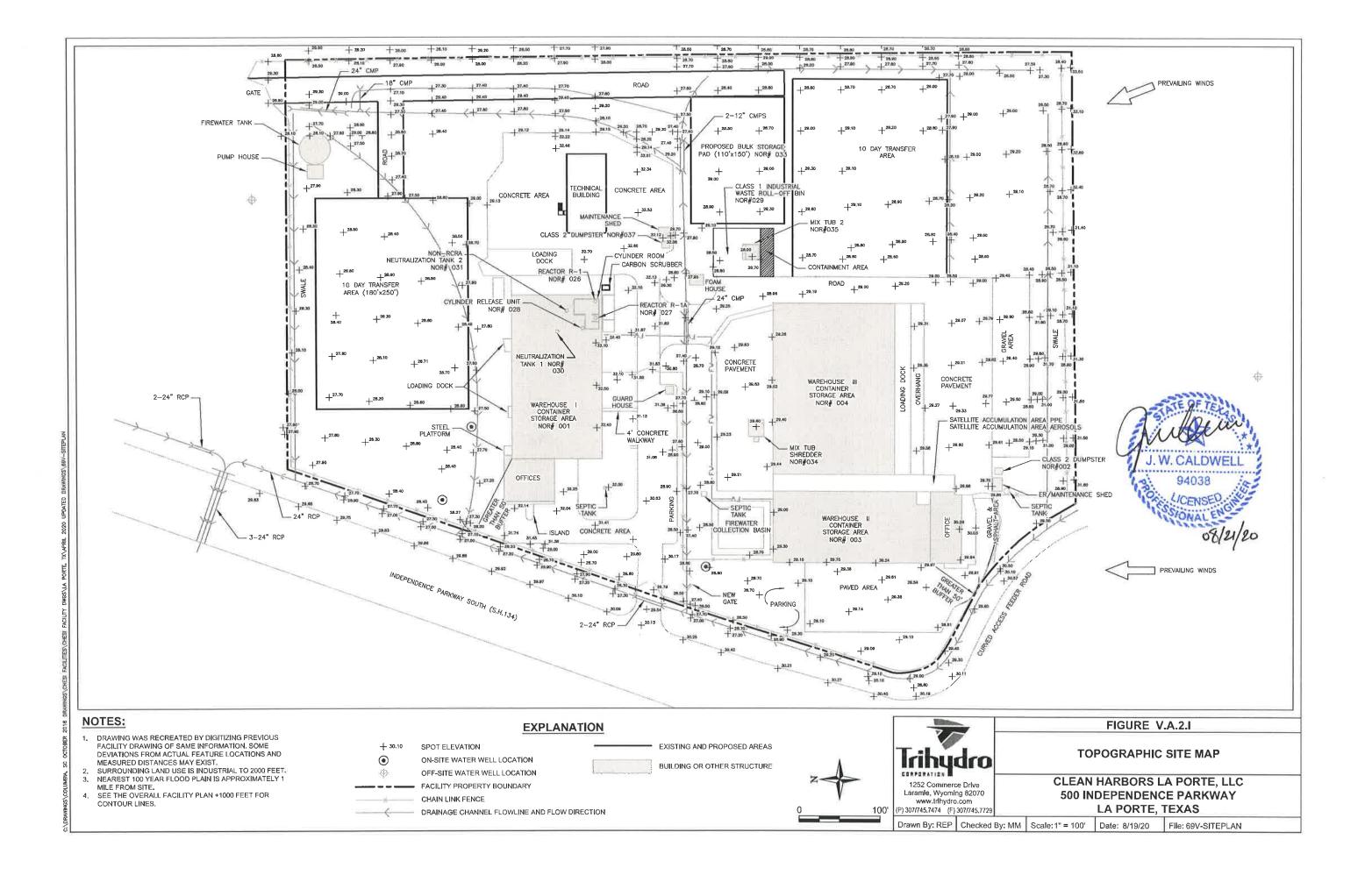


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ROAD GATE -2-12" CMPS PROPOSED
BULK STORAGE PAD
(110'x150')
NOR# 033 FACILITY BOUNDARY - 10 DAY -TRANSFER AREA CONC. AREA CONC. AREA CLASS 1 INDUSTRIAL WASTE ROLL-OFF BIN CLASS 2 DUMPSTER NOR # Q37 CYLINDER ROOM: CONTAINMENT AREA LOADING DOCK 10 DAY TRANSFER AREA REACTOR R-1-NOR# 026 ROAD (180'x250') FACILITY BOUNDARY-WAREHOUSE CONTAINER STORAGE AREA WAREHOUSE III CONTAINER STORAGE AREA NOR# 001 CONCRETE PAVEMENT NOR# 004 -2-24" RCP 4' CONC J. W. CALDWELL CLASS 2 DUMPSTER NOR # 002 STEEL PLATFORM-OFFICES ER/MAINTENANCE SHED -(8) 24° RCP WAREHOUSE II CONTAINER STORAGE AREA CONC. AREA NOR# 003 INDEPENDENCE PARKWAY SOUTH (S.N. 134) North — PAVED AREA DRAWING WAS RECREATED BY DIGITIZING PREMIOUS FACILITY DRAWING OF SAME INFORMATION, SOME DEVIATIONS FROM ACTUAL FEATURE LOCATIONS AND MEASURED DISTANCES MAY EXIST. SEE TOPOGRAPHIC MAP (ATTACHMENT V. A .2 IN PART B) FOR ACCURATE RENDITION OF FEATURES AND PROPERTY LINES. 2 - 24" RCP NEW GATE **LEGEND** _____ FACILITY PROPERTY BOUNDARY CHAIN LINK FENCE BOUNDARY OF EXISTING CONTAINER STORAGE AREAS LAPORTE ADDED MISSING SECTION OF FENCE & PROPOSED BULK STORAGE PAD REFERENCE DRAWINGS DRAINAGE CHANNEL FLOWLINE AND FLOW DIRECTION DAD 8/19/20 TITLE DRAWING NO. 10 PERMIT RENEWAL 2020 KMC DAD 5/7/20 CLASS I MODIFICATION KMC BR 3/21/14 FENCE LINE MODIFICATION В KMC BR 10/8/13 SITE PLAN REMOVED "PROPOSED NOR# 032" BR 8/10/12 FACILITY TRAFFIC PATTERNS REMOVED "PROPOSED" FROM NOR # 030, KMC MC 12/29/09 ADDED NOR# 029 & NOR# 031 REVISED ADDRESS, REMOVED ADJACENT PROPERTY INFORMATION & ADDED NOR #'S FILE: 403-01E REV. 11 MAR 7/30/09 DWG. NO.: REV. CHECKED BATE R.A.H. 1 = 50403-01E CONSULTED ATTRIVES



Permit #: 50225

CONSTRUCTION SCHEDULE

Construction Schedule for Addition of Outdoor storage area Outdoor 033

- Project start date Day o
- Submit bid specifications for unit ~30 days from project start date
- Review bids and select contractor ~30 days from date bids are received
- Start construction ~30 days from date of contractor selection
- Construction completion ~30 days from construction start date

Total Time - ~120 days (weather permitting)

Submit specifications for unit—Approval plus o month

Choose contractor—Approval plus o months Installation—Approval plus 2 months

Plus 2 months Completion—Approval plus 2 months

Permit #: 50225

CONSTRUCTION SCHEDULE

Construction Schedule for Bulk Container Storage Area (NOR # 033)

- Project start date Day o
- Submit bid specifications for unit ~30 days from project start date
- Review bids and select contractor ~30 days from date bids are received
- Start construction ~30 days from date of contractor selection
- Construction completion ~30 days from construction start date

<u>Total Time - ~120 days (weather permitting)</u>



Permit No. 50225

Clean Harbors LaPorte, LLC Permittee:

Page 1 of 3

Table V.A. - Facility Waste Management Handling Units

TCEQ Permit Unit No. ¹	Unit Name	NOR No.1	Unit Description ³	Capacity	Unit Status ²
1	Container Storage Area I (Warehouse I) 001 202' x 109' covered storage area		403,960 <u>gallons</u>	Active	
2	Container Storage Area II (Warehouse II)	003	188' 189' x 76' covered storage area	264,970 <u>gallons</u>	Active
3	Container Storage Area III (Warehouse III)	004	209' x 142' covered storage area	395, 340 gallons	Active
4	Tank VS-593-1001	005	Storage Tank	22,500 <u>gallons</u>	Never Built and No Longer Permitted
5	Tank VS-593-1002	006	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
6	Tank VS-593-2001	007	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
7	Tank VS-593-2002	008	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
8	Tank VS-593-2003	009	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
9	Tank VS-593-2004	010	Storage Tank	22,500 gallons	Never Built and No Longer Permitted

TCEQ Part B Application TCEQ-00376

Revision No. $\theta 1$

Revision Date May 29 August 21, 2020

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Permit No. 50225

Permittee: Clean Harbors LaPorte, LLC

Page 2 of 3

TCEQ Permit Unit No. ¹	Unit Name	NOR No. ¹	Unit Description ³	Capacity	Unit Status ²
10	Tank VS-593-2005	011	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
11	Tank VS-593-3001	012	Storage Tank	22,500_gallons	Never Built and No Longer Permitted
12	Tank VS-593-3002	013	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
13	Tank VS-593-3003	014	Storage Tank	22,500_gallons	Never Built and No Longer Permitted
14	Tank VS-593-2101	015	Storage Tank	1,300 gallons	Never Built and No Longer Permitted
15	Tank VS-593-3101	016	Processing Tank	1,300 gallons	Never Built and No Longer Permitted
16	Tank VS-593-2006	017	Storage Tank	8,500 gallons	Never Built and No Longer Permitted
17	Tank VS-593-2007	018	Storage Tank	8,500_gallons	Never Built and No Longer Permitted
18	Tank VS-593-3004	019	Storage Tank	8,500 <u>gallons</u>	Never Built and No Longer Permitted
19	Tank VS-593-3005	020	Storage Tank	8,500_gallons	Never Built and No Longer Permitted
20	Tank VS-593-6101	021	Processing Tank	100 gallons	Never Built and No Longer Permitted

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TCEQ Permit Unit No. ¹	Unit Name	NOR No. ¹	Unit Description ³ Capacity		Unit Status ²
21	Tank VS-593-4001	022	Storage Tank 5,100 gallons		Never Built and No Longer Permitted
22	Solids Shredder & Compactor	023	Miscellaneous Unit	To Be Determined	Never Built and No Longer Permitted
23	Drum Washer	024	Miscellaneous Unit	To Be Determined	Never Built and No Longer Permitted
24	Chemical Reactor Tank R-1	026	Processing Tank located inside Warehouse I	500 200 gallons	Active
25	Chemical Reactor Tank R-1A	027	Processing Tank located inside Warehouse I (Replacement Processing Tank to be located inside Warehouse I)	500 <u>gallons</u> (Proposed 1,500 <u>gallons</u>)	Active- Never Built and No Longer Permitted (Proposed)
26	Cylinder Release Unit 1	028	Miscellaneous Unit, located inside Warehouse I	19,800 Cubic Ft per hourN.A.	Active
28	Cylinder Release Unit 2	032	Miscellaneous Unit, located inside Warehouse III	N.A.	Never Built and No Longer Permitted Proposed
033	Bulk Container Storage Area	033	110'x150' Bulk Outdoor Container Storage Area	181,777 gallons (28 roll- off boxes)	Proposed
027	Chemical Reactor Tank R-2	030	Processing Tank located inside Warehouse I	500	Proposed

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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.

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- 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.

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Table V.A. - Facility Waste Management Handling Units

TCEQ Permit Unit No. ¹	Unit Name	NOR No. ¹	Unit Description ³	Capacity	Unit Status ²
1	Container Storage Area I (Warehouse I)	001	202' x 109' covered storage area	403,960 gallons	Active
2	Container Storage Area II (Warehouse II)	003	189' x 76' covered storage area	264,970 gallons	Active
3	Container Storage Area III (Warehouse III)	004	209' x 142' covered storage area	395, 340 gallons	Active
4	Tank VS-593-1001	005	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
5	Tank VS-593-1002	006	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
6	Tank VS-593-2001	007	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
7	Tank VS-593-2002	008	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
8	Tank VS-593-2003	009	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
9	Tank VS-593-2004	010	Storage Tank	22,500 gallons	Never Built and No Longer Permitted

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TCEQ Permit Unit No. ¹	Unit Name	NOR No. ¹	Unit Description ³	Capacity	Unit Status ²
10	Tank VS-593-2005	011	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
11	Tank VS-593-3001	012	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
12	Tank VS-593-3002	013	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
13	Tank VS-593-3003	014	Storage Tank	22,500 gallons	Never Built and No Longer Permitted
14	Tank VS-593-2101	015	Storage Tank	1,300 gallons	Never Built and No Longer Permitted
15	Tank VS-593-3101	016	Processing Tank	1,300 gallons	Never Built and No Longer Permitted
16	Tank VS-593-2006	017	Storage Tank	8,500 gallons	Never Built and No Longer Permitted
17	Tank VS-593-2007	018	Storage Tank	8,500 gallons	Never Built and No Longer Permitted
18	Tank VS-593-3004	019	Storage Tank	8,500 gallons	Never Built and No Longer Permitted
19	Tank VS-593-3005	020	Storage Tank	8,500 gallons	Never Built and No Longer Permitted
20	Tank VS-593-6101	021	Processing Tank	100 gallons	Never Built and No Longer Permitted

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TCEQ Permit Unit No. ¹	Unit Name	NOR No. ¹	Unit Description ³	Capacity	Unit Status ²
21	Tank VS-593-4001	022	Storage Tank 5,100 gallons		Never Built and No Longer Permitted
22	Solids Shredder & Compactor	023	Miscellaneous Unit	To Be Determined	Never Built and No Longer Permitted
23	Drum Washer	024	Miscellaneous Unit	To Be Determined	Never Built and No Longer Permitted
24	Chemical Reactor Tank R-1	026	Processing Tank located inside Warehouse I	200 gallons	Active
25	Chemical Reactor Tank R-1A	027	Processing Tank located inside Warehouse I (Replacement Processing Tank to be located inside Warehouse I)	500 gallons	Active Never Built and No Longer Permitted
26	Cylinder Release Unit 1	028	Miscellaneous Unit, located inside Warehouse I	19,800 Cubic Ft per hour	Active
28	Cylinder Release Unit 2	032	Miscellaneous Unit, located inside Warehouse III	N.A.	Never Built and No Longer Permitted
033	Bulk Container Storage Area	033	110'x150' Bulk Outdoor Container Storage Area	181,777 gallons (28 roll- off boxes)	Proposed

^{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.

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^{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.



Clean Harbors La Porte, LLC, La Porte, TX EPA ID#: TXD982290140 Permit #: 50225

ENGINEERING REPORT - CONTAINER STORAGE AREA 4BULK CONTAINER STORAGE AREA

GENERAL INFORMATION

This Engineering Report contains details specific to Container Storage Area 4 (TCEQ unit 033, NOR 033) of the Clean Harbors LaPorte, LLC facility. For additional details on this unit see: Current Site Plan included in the General Engineering Report (Appendix V.A of the Part B application); Tables V.A and V.B of Part B application.

Container Storage Area 4 (Outdoor Storage 033) is proposed to be constructed east of Container Storage Area 3. This unit was permitted on January 7, 2016 as a Class 2 Permit Modification based on an initial submittal in June 2015 and revisions through December 2015. The container storage area is a proposed outdoor container storage pad used to store bulk storage container bins that will be constructed with containment to accommodate thirty cubic yard units. The proposed unit is permitted to store waste with no free liquids. The area will mirror all storage conditions and requirements of the previously permitted storage areas but will not have a roof. Area will be 150' x 110'. Existing area will be graded as needed. Area will be rolled after grade is established. A layer of geo fabric will be laid out. 8" of cement crushed concrete will be brought in, leveled out and rolled. After that, 8" of 3000 PSI concrete will be poured on top with #4 rebar on 12" centers each way. In the north east corner, a 4' x 4' catch basin will be installed with a 2" drain pipe and valve outside of new slab. On the front side a slight ramp will be poured and a 6" x 6" curb will be poured on the remainder three sides The approximate dimensions of Outdoor Storage 033 are 110 feet wide by 150 feet long.

The storage and staging area will have concrete bases with floors that have been sealed with an epoxy coating. The proposed perimeter curbs are a minimum of 6 inch high reinforced concrete. Either a gently sloped concrete berm or metal ramp is provided for safe movement of container handling equipment over the curbs. between the subdivided areas within each container storage and staging areas. The Overall Facility Plan attached to the General Engineering Report (Appendix V.A) shows proposed construction details for Outdoor Storage 033 (i.e., curbs, dimensions).

Outdoor Storage 033 is located outside a 100 year flood plain (see FEMA Map attached to Section II.F) and is more than 15 meters (50 ft) from the property line as required by 40 CFR 264.176 (see the Overall Facility Plan attached to Appendix V.A). Final design details are pending construction..

As shown on Table V.B of the Part B application, Outdoor Storage 033 is designed to store 181,775 777 gallons (3,305 55-gallon drum equivalents) in DOT containers that contain a wide variety of organic and inorganic wastes including wastes that maybe ignitable, reactive or incompatible. No free liquids are to be stored in Outdoor Storage 033. Specific waste numbers are found on Table IV.B and Table V.B of the Part B application.

The remaining sections below are structured based on the requirements of 40 CFR

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264.171-264.173 and 264.175-264.177. The information outlined in 40 CFR 270.15 is

Appendix V.B.iv Engineering Report: CSA4 21, 2020

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ENGINEERING REPORT - BULK CONTAINER STORAGE AREA

GENERAL INFORMATION

This Engineering Report contains details specific to Container Storage Area 4 (TCEQ unit 033, NOR 033) of the Clean Harbors LaPorte, LLC facility. For additional details on this unit see: Current Site Plan included in the General Engineering Report (Appendix V.A of the Part B application); Tables V.A and V.B of Part B application.

Container Storage Area 4 (Outdoor Storage 033) is proposed to be constructed east of Container Storage Area 3. This unit was permitted on January 7, 2016 as a Class 2 Permit Modification based on an initial submittal in June 2015 and revisions through December 2015. The container storage area is a proposed outdoor container storage pad used to store bulk storage container bins that will be constructed with containment to accommodate thirty cubic yard units. The proposed unit is permitted to store waste with no free liquids. The area will mirror all storage conditions and requirements of the previously permitted storage areas but will not have a roof. Area will be 150' x 110'. Existing area will be graded as needed. Area will be rolled after grade is established. A layer of geo fabric will be laid out. 8" of cement crushed concrete will be brought in, leveled out and rolled. After that, 8" of 3000 PSI concrete will be poured on top with #4 rebar on 12" centers each way. In the north east corner, a 4' x 4' catch basin will be installed with a 2" drain pipe and valve outside of new slab. On the front side a slight ramp will be poured and a 6" x 6" curb will be poured on the remainder three sides.

The storage and staging area will have concrete bases with floors that have been sealed with an epoxy coating. The proposed perimeter curbs are a minimum of 6 inch high reinforced concrete. Either a gently sloped concrete berm or metal ramp is provided for safe movement of container handling equipment over the curbs. between the subdivided areas within each container storage and staging areas. The Overall Facility Plan attached to the General Engineering Report (Appendix V.A) shows proposed construction details for Outdoor Storage 033 (i.e., curbs, dimensions).

Outdoor Storage 033 is located outside a 100 year flood plain (see FEMA Map attached to Section II.F) and is more than 15 meters (50 ft) from the property line as required by 40 CFR 264.176 (see the Overall Facility Plan attached to Appendix V.A). Final design details are pending construction..

As shown on Table V.B of the Part B application, Outdoor Storage 033 is designed to store 181,777 gallons (3,305 55-gallon drum equivalents) in DOT containers that contain a wide variety of organic and inorganic wastes including wastes that maybe ignitable, reactive or incompatible. No free liquids are to be stored in Outdoor Storage 033. Specific waste numbers are found on Table IV.B and Table V.B of the Part B application.

The remaining sections below are structured based on the requirements of 40 CFR 264.171-264.173 and 264.175-264.177. The information outlined in 40 CFR 270.15 is



Attachment 8

ENGINEERING REPORT – R-1A

GENERAL INFORMATION

The drawings listed below are included with this Engineering Report (R-1A) for Clean Harbors LaPorte, LLC.

Drawing No. 6726-M-01 Drawing No. L-201A-PF-001-D Drawing No. L-201A-PI-001-D

This section provides basic descriptions and specifications for the current permitted tank system (Permitted unit # 025). Chemical Treatment Reactor Tank R-1A described herein is utilized to treat certain wastes received at the facility. The tank is operated independently and in batch-mode and is designed to operate with zero emissions. The tank utilizes a two-stage wet scrubber for potential upset emission control. They contain solutions designed to react with the various wastes and convert them to less toxic byproducts. The solutions contained within the tanks may be acidic, alkaline, oxidizing or reducing depending on the nature of the waste being treated. Once a batch is complete the contents of the tank are drained and placed into containers. The containers are stored in a Container Storage Area until being shipped off-site for disposal

The Table V.C. and the table below list the tank currently permitted and in operation, the current permit unit number and rated capacity and process description. A General description follows.

Reaction Tanks						
Permit Unit No.	Tank Designation	Rated Capacity (gallons)	Tank Process Description			
025	R-1A	500 (Proposed 1,500)	Chemical Treatment Reactor Tank			

The permitted tank was constructed in accordance with the design requirements of 40 CFR Part 264, Subpart J and has a concrete secondary containment system with a chemical resistant coating. The chemical treatment tank is located in Warehouse I to eliminate the effects of contact with rainfall. Warehouse I secondary containment volume is sufficient to meet the requirements of the unit.

ENGINEERING REPORT – R-1A

GENERAL INFORMATION

The drawings listed below are included with this Engineering Report (R-1A) for Clean Harbors LaPorte, LLC.

Drawing No. 6726-M-01 Drawing No. L-201A-PF-001-D Drawing No. L-201A-PI-001-D

This section provides basic descriptions and specifications for the current permitted tank system (Permitted unit # 025). Chemical Treatment Reactor Tank R-1A described herein is utilized to treat certain wastes received at the facility. The tank is operated independently and in batch-mode and is designed to operate with zero emissions. The tank utilizes a two-stage wet scrubber for potential upset emission control. They contain solutions designed to react with the various wastes and convert them to less toxic byproducts. The solutions contained within the tanks may be acidic, alkaline, oxidizing or reducing depending on the nature of the waste being treated. Once a batch is complete the contents of the tank are drained and placed into containers. The containers are stored in a Container Storage Area until being shipped off-site for disposal

The Table V.C. and the table below list the tank currently permitted and in operation, the current permit unit number and rated capacity and process description. A General description follows.

Reaction Tanks						
Permit Unit No.	Tank Designation	Rated Capacity (gallons)	Tank Process Description			
025	R-1A	500	Chemical Treatment Reactor Tank			

The permitted tank was constructed in accordance with the design requirements of 40 CFR Part 264, Subpart J and has a concrete secondary containment system with a chemical resistant coating. The chemical treatment tank is located in Warehouse I to eliminate the effects of contact with rainfall. Warehouse I secondary containment volume is sufficient to meet the requirements of the unit.

SECONDARY CONTAINMENT CALCULATIONS

Warehouse I / Container Storage Area 1 in which Tank System R-1A is Located

Calculations from Container Storage Area 1 in Appendix V.B.i

Containment capacity = 20,610 s.f. x 0.5 ft x 0.9 usage factor x 7.48 gal./c.f. = 69,300 gallons

Storage capacity = 10x containment capacity = 693,000 gallons

Rated storage capacity = 403,960 gallons (approximately 7,345 55-gallon drum equivalents) for waste handled in Container Storage Area 1

Tank System R-1A

Tank Systems R-1, and R-1A, and R-2 are located inside

Warehouse I Tank System R-1 rated capacity = 200 gallons

Tank System R-1A rated capacity = $\frac{1,500500}{1}$ gallons

(proposed) Tank System R2 rated capacity = 500 gallons

Combined rated capacity for Container Storage Area 1, Tank System R-1, and Tank System R-1A, and Tank System R2 is:

 $403,960 \text{ gallons} + 200 \text{ gallons} + \frac{1,500500}{900} \text{ gallons} + \frac{500 \text{ gallons}}{9000} = \frac{400,1600}{9000} = \frac{1,500500}{9000} = \frac{1,50$

This combined amount is less than the calculated storage capacity for Warehouse I (693,000 gallons) in which these Units reside.

This area is covered with a perimeter berm, so rainfall and run-on do not need to be considered in containment calculations.

SECONDARY CONTAINMENT CALCULATIONS

Warehouse I / Container Storage Area 1 in which Tank System R-1A is Located

Calculations from Container Storage Area 1 in Appendix V.B.i

Containment capacity = $20,610 \text{ s.f.} \times 0.5 \text{ ft } \times 0.9 \text{ usage factor } \times 7.48 \text{ gal./c.f.} = 69,300 \text{ gallons}$

Storage capacity = 10x containment capacity = 693,000 gallons

Rated storage capacity = 403,960 gallons (approximately 7,345 55-gallon drum equivalents) for waste handled in Container Storage Area 1

Tank System R-1A

Tank Systems R-1, and R-1A are located inside Warehouse I

Tank System R-1 rated capacity = 200 gallons

Tank System R-1A rated capacity = 500 gallons

Combined rated capacity for Container Storage Area 1, Tank System R-1 and Tank System R-1A is:

403,960 gallons + 200 gallons + 500 gallons = 404,660 gallons

This combined amount is less than the calculated storage capacity for Warehouse I (693,000 gallons) in which these Units reside.

This area is covered with a perimeter berm, so rainfall and run-on do not need to be considered in containment calculations.

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Permittee: Clean Harbors La Porte, LLC

Table V.C. - Tanks and Tank System

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste 1 Nos.	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)
024	R-1	026	Processing	See Table IV.B.2	200 gallons	2.2' by 4.5'	69,300	Ignitable - No <u>Yes</u> Reactive - Yes Incompatible - Yes
025	R-1A	027	Processing	See Table IV.B.2	500 gallons (Proposed 1500 gallons)	4.0' by 5.5' (Proposed 6.0' by 8.0')	69,300	Ignitable - No <u>Yes</u> Reactive - Yes Incompatible - Yes
Proposed 027	R2	030	Processing	See Table IV.B.2	500 gallons	4.0' by 5.0'	69,300	Ignitable – Yes Reactive – Yes Incompatible – Yes

1 from Table IV.B, first column

Table V.C. - Tanks and Tank System

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste 1 Nos.	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)
024	R-1	026	Processing	See Table IV.B.2	200 gallons	2.2' by 4.5'	69,300	Ignitable– Yes Reactive – Yes Incompatible – Yes
025	R-1A	027	Processing	See Table IV.B.2	500 gallons	4.0' by 5.5'	69,300	Ignitable- Yes Reactive - Yes Incompatible - Yes

1 from Table IV.B, first column

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Table V.K. - Miscellaneous Units

Permit Unit No.*	Miscellaneous Unit	N.O.R. No.	Storage, Processing, and/or Disposal	Waste Nos. ¹	Rated Capacity	Dimensions	Unit will manage Ignitable, Reactive, or Incompatible Waste (state all that apply)
026	Cylinder Release Unit	028	Processing	See Table IV.B	19,800 Cubic Ft per hour N/A	Unit is a series of tubing, piping and valves from the cylinder connection to the atmosphere with no capacity to measure regarding storage or possessing it is direct a release unit. N/A	Ignitable and Reactive
028	Proposed Cylinder Release Unit 2	032	Processing	See Table FV.B.3	N/A	N/A	Ignitable and Reactive

1from Table IV.B, first column

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^{*}If the unit is already permitted, use the established "Permit Unit No." If the unit is not yet permitted, the number given here for the unit will become the "Permit Unit No." The numbers should be in an order that will be convenient for the facility operator.

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Permittee: Clean Harbors La Porte, LLC

Table V.K. - Miscellaneous Units

Permit Unit No.*	Miscellaneous Unit	N.O.R. No.	Storage, Processing, and/or Disposal	Waste Nos. ¹	Rated Capacity	Dimensions	Unit will manage Ignitable, Reactive, or Incompatible Waste (state all that apply)
026	Cylinder Release Unit	028	Processing	See Table IV.B	19,800 Cubic Ft per hour	Unit is a series of tubing, piping and valves from the cylinder connection to the atmosphere with no capacity to measure regarding storage or possessing – it is direct a release unit.	Ignitable and Reactive

1from Table IV.B, first column

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^{*}If the unit is already permitted, use the established "Permit Unit No." If the unit is not yet permitted, the number given here for the unit will become the "Permit Unit No." The numbers should be in an order that will be convenient for the facility operator.



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Table V.B. - Container Storage Area

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)
001	Warehouse I	001	See Table IV.B	403,960 gallons	202' x 109'	69,300 gallons	Reactive and Incompatible
002	Warehouse II	003	See Table IV.B	264,970 gallons	188' <u>189'</u> x 76'	48,000 gallons	Reactive and Incompatible
003	Warehouse III	004	See Table IV.B	395,340 gallons	209' x 142'	99,800 gallons	Ignitable, Reactive, and Incompatible
033	Outdoor Storage 033	033	See Table IV.B	181, 775 77 <u>7</u> gallons	110' x 150'	NA (no free liquids)	Ignitable, Reactive, and Incompatible

¹ Containers managing ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line.

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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

Table V.B. - Container Storage Area

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)
001	Warehouse I	001	See Table IV.B	403,960 gallons	202' x 109'	69,300 gallons	Reactive and Incompatible
002	Warehouse II	003	See Table IV.B	264,970 gallons	189' x 76'	48,000 gallons	Reactive and Incompatible
003	Warehouse III	004	See Table IV.B	395,340 gallons	209' x 142'	99,800 gallons	Ignitable, Reactive, and Incompatible
033	Outdoor Storage 033	033	See Table IV.B	181,777 gallons	110' x 150'	NA (no free liquids)	Ignitable, Reactive, and Incompatible

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



Attachment 10

Permittee:

Clean Harbors La Porte, LLC

Table VII.A. - Unit Closure

For each unit to be permitted, list the facility components to be decontaminated, the possible methods of decontamination, and the possible methods of disposal of wastes and waste residues generated during unit closure:

Equipment or HWM Unit	Possible Methods of Decontamination ^l	Possible Methods of Disposal ¹
Warehouse I:		
Waste Containers	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Secondary Containment Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Container Storage Racks	Disassembly and hydroblasting	Landfill, Recycling
Wooden pallets	send offsite with containers	Incineration, Landfill, Recyclin
Loading/Unloading Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Warehouse II:		
Waste Containers	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Secondary Containment Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Container Storage Racks	Disassembly and hydroblasting	Landfill, Recycling
Wooden Pallets	send offsite with containers	Incineration, Landfill, Recyclin
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Warehouse III:		
Waste Containers	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Secondary Containment Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Container Storage Racks	Disassembly and hydroblasting	Landfill, Recycling
Wooden Pallets	send offsite with containers	Incineration, Landfill, Recyclin
Loading/Unloading Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Solid Decontamination Waste	Removal for off-site disposalSolid Decontamination Waste	Incineration, Landfill, Off-site Treatment

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Equipment or HWM Unit	Possible Methods of Decontamination ¹	Possible Methods of Disposal ¹
Bulk Container Storage Area:		
Waste Containers	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Secondary Containment Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Waste Treatment Tanks & ancillary equipment:	Landfill, Recycling	
Waste Liquids	Pump liquids and remove for off-site disposal	Incineration, Landfill, Off-site Treatment
Tank Surfaces (interior and exterior)	Initial rinse followed by hydroblasting	Incineration, Landfill, Off-site Treatment
Secondary Containment Area	Hydroblasting	Incineration, Landfill, Off-site Treatment
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Miscellaneous Areas <u>Unit</u> :	Incineration, Landfill, Off-site Treatment	
Drum Staging Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Cylinder Release Units	Disassembly and hydroblasting	Incineration, Landfill, Recycling

1Applicants may list more than one appropriate method.

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Permit No. 50225

Clean Harbors La Porte, LLC

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Table VII.A. - Unit Closure

For each unit to be permitted, list the facility components to be decontaminated, the possible methods of decontamination, and the possible methods of disposal of wastes and waste residues generated during unit closure:

Equipment or HWM Unit	Possible Methods of Decontamination ¹	Possible Methods of Disposal 1
Warehouse I:		
Waste Containers	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Secondary Containment Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Container Storage Racks	Disassembly and hydroblasting	Landfill, Recycling
Wooden pallets	send offsite with containers	Incineration, Landfill, Recycling
Loading/Unloading Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Warehouse II:		
Waste Containers	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Secondary Containment Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Container Storage Racks	Disassembly and hydroblasting	Landfill, Recycling
Wooden Pallets	send offsite with containers	Incineration, Landfill, Recycling
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Warehouse III:		
Waste Containers	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Secondary Containment Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Container Storage Racks	Disassembly and hydroblasting	Landfill, Recycling
Wooden Pallets	send offsite with containers	Incineration, Landfill, Recycling
Loading/Unloading Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment

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Equipment or HWM Unit	Possible Methods of	Paggible Methods of Dignosel
Equipment of IIWW onit	Decontamination ¹	Possible Methods of Disposal ¹
Bulk Container Storage Area:		
Waste Containers	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Secondary Containment Areas	Hydroblasting	Incineration, Landfill, Off-site Treatment
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Waste Treatment Tanks & ancillary equipment:		
Waste Liquids	Pump liquids and remove for off-site disposal	Incineration, Landfill, Off-site Treatment
Tank Surfaces (interior and exterior)	Initial rinse followed by hydroblasting	Incineration, Landfill, Off-site Treatment
Secondary Containment Area	Hydroblasting	Incineration, Landfill, Off-site Treatment
Solid Decontamination Waste	Removal for off-site disposal	Incineration, Landfill, Off-site Treatment
Miscellaneous Unit:		
Cylinder Release Units	Disassembly and hydroblasting	Incineration, Landfill, Recycling

1Applicants may list more than one appropriate method.



Attachment 11

EPA ID#: TXD982290140 Permit #: 50225

1.0 GENERAL INFORMATION

1.1 General Site Information and Maximum Capacities

Clean Harbors La Porte, LP_LLC (Facility), located at 500 Independence Parkway South in La Porte, Texas, operates as commercial hazardous and industrial solid waste transfer and storage facility. The Facility is permitted to receive hazardous waste in containers for storage, bulking, processing or disposal. Hazardous waste is stored on-site in containers, then processed or disposed on-site or shipped off-site for treatment or disposal.

The Facility consists of three container storage areas, two treatment tanks, a cylinder release unit and upon construction one modified waste treatment tank and a second cylinder release unit. Each waste storage and management area is equipped with a secondary containment system designed to contain any leaks or spills and prevent run-on. All waste storage and management areas are covered to protect them from weather and to prevent the accumulation of rainwater. Waste loading and unloading areas are also bermed and covered.

The Facility can store up to 1,064,270 gallons of waste in containers. Waste containers may also be temporarily staged prior to acceptance for storage or shipment off-site for treatment or disposal. The Facility may stage 8,800 gallons of containerized waste in each of its three temporary staging areas (26,400 gallons total). The Facility also has two tanks and a wet scrubber with a total of 2,150 gallons of waste liquid capacity. The modified tank will add 1,000 gallons capacity.

1.2 Compliance With Risk Reduction Standards

In addition to meeting the federal requirements for closure, hazardous and industrial solid waste facilities in Texas must be closed in accordance with the Texas Risk Reduction Standards given in 30 TAC Chapter 335, Subchapter S. This closure plan has been developed to document compliance with this requirement. In particular, the site will be closed in accordance with Risk Reduction Standard Number 1 as given in 30 TAC 335.554. This involves closure and decontamination of the site to background levels. Detailed descriptions of the procedures that will take place during closure in order to attain compliance with Risk Reduction Standard Number 1 are given in subsequent sections of this plan. If it is found that the site cannot meet Risk Reduction Standard Number 1, it will amend its plan to correspond to the selected closure standard.

With the Facility meeting Risk Reduction Standard Number 1, the site does not anticipate encountering soil contamination requiring excavation and backfilling. The facility operates in a way to minimize spill events and immediately repair concrete cracking. Therefore, this plan does not include costs or schedules for soil remediation. If soil contamination is found during closure, the plan will be amended to encompass the situation. In the event a release of constituents of concern (COC"s) is found in

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1.0 GENERAL INFORMATION

1.1 General Site Information and Maximum Capacities

Clean Harbors La Porte, LLC (Facility), located at 500 Independence Parkway South in La Porte, Texas, operates as commercial hazardous and industrial solid waste transfer and storage facility. The Facility is permitted to receive hazardous waste in containers for storage, bulking, processing or disposal. Hazardous waste is stored on-site in containers, then processed or disposed on-site or shipped off-site for treatment or disposal.

The Facility consists of three container storage areas, two treatment tanks, a cylinder release unit and upon construction one modified waste treatment tank and a second cylinder release unit. Each waste storage and management area is equipped with a secondary containment system designed to contain any leaks or spills and prevent run-on. All waste storage and management areas are covered to protect them from weather and to prevent the accumulation of rainwater. Waste loading and unloading areas are also bermed and covered.

The Facility can store up to 1,064,270 gallons of waste in containers. Waste containers may also be temporarily staged prior to acceptance for storage or shipment off-site for treatment or disposal. The Facility may stage 8,800 gallons of containerized waste in each of its three temporary staging areas (26,400 gallons total). The Facility also has two tanks and a wet scrubber with a total of 2,150 gallons of waste liquid capacity. The modified tank will add 1,000 gallons capacity.

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Attachment 12

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14. If soil contamination is found in any area, the Facility will submit a revised contingent closure plan to TCEQ to propose a sampling plan that will fully define the extent of contamination in the soil.

4.2 Estimated Closure Schedule

Activity	Cumulative Time (Weeks)
Empty tanks	4
Clean tanks, containment areas and buildings	8
Disassemble and clean ancillary equipment	10
Sample and analyze rinse water	16
Inspect soils and surrounding areas	18
Removal of any contaminated soils	24
Provide certification	26

4.3 Partial Closure of the Tanks and Processing Areas

Partial closure of the tanks and processing areas will involve the closure of one or more tanks or processing areas. Partial closure will proceed using the same procedures and time line given in Sections 4.1 and 4.2, with the following exceptions.

- 1. For partial closure of one or more tank, piping to the tank undergoing closure will be isolated to prevent mixing of rinseates with active waste streams.
- 2. Inspection and removal of contaminated soils from surrounding areas will not be conducted, as waste activities will continue in adjacent areas. Therefore partial closure of a tank or process area will take approximately eight weeks less time than full closure of the area.

5.0 CLOSURE OF CYLINDER RELEASE SYSTEMS AREA

The two-Cylinder Release Systems each consists of an inert gas cylinder for line purging and ancillary equipment. Storage and processing areas are located within the existing Container Storage Area 001 (Warehouse I). Therefore, these units will be provided with secondary containment and covered to prevent the accumulation of rainwater.

Closure of the Cylinder Release Systems will consist of the following activities: removal of two cylinders; shipment of the waste to a permitted off-site facility for treatment and disposal; decontaminating all ancillary equipment; decommissioning and decontaminating all ancillary equipment; collecting and removing all decontaminating rinse waters and media for off-site disposal; and sampling to verify that proper decontamination has taken place.

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14. If soil contamination is found in any area, the Facility will submit a revised contingent closure plan to TCEQ to propose a sampling plan that will fully define the extent of contamination in the soil.

4.2 Estimated Closure Schedule

Activity	Cumulative Time (Weeks)
Empty tanks	4
Clean tanks, containment areas and buildings	8
Disassemble and clean ancillary equipment	10
Sample and analyze rinse water	16
Inspect soils and surrounding areas	18
Removal of any contaminated soils	24
Provide certification	26

4.3 Partial Closure of the Tanks and Processing Areas

Partial closure of the tanks and processing areas will involve the closure of one or more tanks or processing areas. Partial closure will proceed using the same procedures and time line given in Sections 4.1 and 4.2, with the following exceptions.

- 1. For partial closure of one or more tank, piping to the tank undergoing closure will be isolated to prevent mixing of rinseates with active waste streams.
- 2. Inspection and removal of contaminated soils from surrounding areas will not be conducted, as waste activities will continue in adjacent areas. Therefore partial closure of a tank or process area will take approximately eight weeks less time than full closure of the area.

5.0 CLOSURE OF CYLINDER RELEASE SYSTEMS AREA

The Cylinder Release System each consists of an inert gas cylinder for line purging and ancillary equipment. Storage and processing areas are located within the existing Container Storage Area 001 (Warehouse I). Therefore, these units will be provided with secondary containment and covered to prevent the accumulation of rainwater.

Closure of the Cylinder Release Systems will consist of the following activities: removal of two cylinders; shipment of the waste to a permitted off-site facility for treatment and disposal; decontaminating all ancillary equipment; decommissioning and decontaminating all ancillary equipment; collecting and removing all decontaminating rinse waters and media for off-site disposal; and sampling to verify that proper decontamination has taken place.

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Task	Cost
Contingency (10% minimum)	\$860.16
Total Unit Closure Cost	\$9,461.78

Task	Cost
Tank R-1A	
Removal of Waste Flush Tank and Piping Pressure Wash Tank	\$1,997.94
Disassemble Piping Remove Tank	\$834.00
Sample Collection 1 sample = \$52.56 Sample Analysis 1 samples = \$1681.61	\$1,734.17
Disposal tank & piping Decontamination Water Tank contents	\$2,899.56
Transportation Tank Contents, Decontamination Water, Tanks & Piping	\$1,622.91
Engineering Certification 1 tank @ \$1579.94/tank	\$6,415.48
Subtotal	\$15,504.06
Contingency (10% minimum)	\$1,550.41
Total Unit Closure Cost	\$17,054.46

Task	Cost
Tank R2	
Removal of Waste Flush Tank and Piping Pressure Wash Tank	\$1,997.94
Disassemble Piping Remove Tank	\$834.00
Sample Collection 1 sample = \$52.56 Sample Analysis 1 samples = \$1681.61	\$1,734.17

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Task	Cost
Disposal tank & piping Decontamination Water Tank contents	\$2,899.56
Transportation Tank Contents, Decontamination Water, Tanks & Piping	\$1,622.91
Engineering Certification 1 tank @ \$1579.94/tank	\$6,415.48
S ubtotal	15504.06
Contingency (10% minimum)	\$1,550.41
Total Unit Closure Cost	\$17,054.46

Task	Cost
Cylinder Release Unit 1	***************************************
Disassembly and Disposal of Unit 1 units @ \$1,266.1/ unit	\$1,226.10
Verbal description of task (waste amount generated x disposal cost/unit amount)	
Verbal description of task (waste amount generated x disposal cost/unit amount)	
Verbal description of task (waste amount generated x disposal cost/unit amount)	
Other tasks (such as labor, lab analysis, transportation, certifications, etc.)	
Other tasks	
Subtotal	\$1,226.10
Contingency (10% minimum)	\$122.61
Total Unit Closure Cost	\$1,348.71

Task	Cost
Cylinder Release Unit 2	

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Task	Cost	
Disassembly and Disposal of Unit 1 unit @ \$1,266.1/ unit	\$1,226.10	
Verbal description of task (waste amount generated x disposal cost/unit amount)		
Verbal description of task (waste amount generated x disposal cost/unit amount)		
Verbal description of task (waste amount generated x disposal cost/unit amount)		
Other tasks (such as labor, lab analysis, transportation, certifications, etc.)		
Other tasks		
Subtotal	\$1,226.10	
Contingency (10% minimum)	\$122.61	
Total Unit Closure Cost	\$1,348.71	

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Task	Cost
Contingency (10% minimum)	\$860.16
Total Unit Closure Cost	\$9,461.78

Task	Cost
Tank R-1A	
Removal of Waste Flush Tank and Piping Pressure Wash Tank	\$1,997.94
Disassemble Piping Remove Tank	\$834.00
Sample Collection 1 sample = \$52.56 Sample Analysis 1 samples = \$1681.61	\$1,734.17
Disposal tank & piping Decontamination Water Tank contents	\$2,899.56
Transportation Tank Contents, Decontamination Water, Tanks & Piping	\$1,622.91
Engineering Certification 1 tank @ \$1579.94/tank	\$6,415.48
Subtotal	\$15,504.06
Contingency (10% minimum)	\$1,550.41
Total Unit Closure Cost	\$17,054.46

Task	Cost
Cylinder Release Unit 1	
Disassembly and Disposal of Unit 1 units @ \$1,266.1/ unit	\$1,226.10
Verbal description of task (waste amount generated x disposal cost/unit amount)	
Verbal description of task (waste amount generated x disposal cost/unit amount)	
Verbal description of task (waste amount generated x disposal cost/unit amount)	
Other tasks (such as labor, lab analysis, transportation, certifications, etc.)	
Other tasks	
Subtotal	\$1,226.10
Contingency (10% minimum)	\$122.61
Total Unit Closure Cost	\$1,348.71

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

Existing Unit Closure Cost Estimate	
Unit	Cost
Tank R-1 (In 2020 Dollars)	\$9,461.78
Tank R-1A (In 2020 Dollars)	\$17,054.46
Cylinder Release Unit 1 (In 2020 Dollars)	\$1,348.71
Container Storage Area I (In 2020 Dollars)	\$2,032,454.89
Container Storage Area II (In 2020 Dollars)	\$1,327,498.55
Container Storage Area III (In 2020 Dollars)	\$2,039,157.87
Total Existing Unit Closure Cost Estimate ¹	\$5,426,976.26

Proposed Unit Closure Cost Estimate	
Unit	Cost
Outdoor Storage Area (In 2020 Dollars)	\$948,746.78
Tank R-2 (In 2020 Dollars)	\$17,054.46
Cylinder Release Unit 2 (In 2020 Dollars)	\$1,348.71

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.

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 recalculating the revised total cost in current dollars.

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

Existing Unit Closure Cost Estimate	
Unit	Cost
Tank R-1 (In 2020 Dollars)	\$9,461.78
Tank R-1A (In 2020 Dollars)	\$17,054.46
Cylinder Release Unit 1 (In 2020 Dollars)	\$1,348.71
Container Storage Area I (In 2020 Dollars)	\$2,032,454.89
Container Storage Area II (In 2020 Dollars)	\$1,327,498.55
Container Storage Area III (In 2020 Dollars)	\$2,039,157.87
Total Existing Unit Closure Cost Estimate ¹	\$5,426,976.26

Proposed Unit Closure Cost Estimate	
Unit	Cost
Outdoor Storage Area (In 2020 Dollars)	\$948,746.78

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.

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Attachment 13

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Table III.D. - Inspection Schedule

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Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
CONTAINER STORAGE AREAS/STAGING AREAS	 Curbs, floor and floor coatings have no cracks, chips and gouges. Container racks in good condition and structurally sound. Pallets holding containers in good condition and structurally sound. No spills, collected liquids, or standing liquids. No emergency equipment or emergency exits blocked. Fire extinguishers in place and full charged. Safety showers and eyewash stations operating properly. Area clear of debris and trash. All lights illuminated. Aisles unobstructed and two foot spacing maintained. Trailer and truck wheels chocked. Satellite drums closed, properly labeled/marked, not full and no clutter/debris around area. 	Daily (except weekends and holidays)

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Table III.D. - Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
CONTAINERS	Proper approved container used. No leaking or waste on the outside of drums or containers. No spills or standing liquids. No damaged, corroded, or rusted containers. Lids, Rings, Bungs, Valves, Ties, Flaps, etc. closed per US DOT standards. Containers properly secured on pallets or by other means. Labels/Markings correct, legible and facing out. Containers not stacked more than three (3) high. Bulk containers have proper markings. Exempt packages follow all requirements. Incompatible wastes are properly segregated and placed in properly designated Storage Units.	Daily (except weekends and holidays)

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Table III.D. - Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
TANKS AND ANCILLARY COMPONENTS	Overfill prevention equipment fully functional. This includes, but is not limited to, high-level alarms, automatic feed shutoffs, and emergency relief valves. Tanks, piping, valves, fittings, pumps, and foundations/supports have sufficient integrity to continue operational activities. Instrumentation, including but not limited to, flow indicators and temperature/pressure gauges, are fully functional and not transmitting abnormal information. Secondary containment system is free of cracks, gouges, chips or deterioration that could cause a physical release. Secondary containment system lining is not deteriorated such that a release could be possible. Sump system is functional with no excess accumulations. No standing water or spills. Waste loading/unloading areas are free of cracks or deterioration that could cause a possible release. Waste loading/unloading areas are free of standing liquids or spills.	Daily

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Table III.D	Inspection	Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
SAFETY EQUIPMENT	All signs are in specified locations, clearly visible and in good condition. All spill cabinets and spill kits are fully stocked and in specified locations. Emergency monitoring equipment is operational and calibrated. SCBAs and egress bottles are functional, fully charged and in specified locations. First Aid and Blood Borne Pathogen kits are stocked and in specified locations. Phones, intercoms, horns and fire alarms are operating and in specified locations. Shelter-In-Place signs and kits all fully stocked and in specified locations. Fire pump and foam house inspections completed. Monthly eye wash stations and fire extinguisher inspections complete. Fire hydrants are not blocked and are clearly visible.	Weekly
SECURITY	Fence and barbed wire in place, no gaps and in good condition. All perimeter signs in place and visible from 25 feet. Gates operating, locked (if appropriate) and in good condition. Perimeter and parking lot lights all operational. Visitor orientation, check in procedures and safety rules being followed.	Weekly

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Table III.D. - Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
FIRE AND EVACUATION ROUTES	Evacuation signs posted, legible, not obstructed and in designated locations. All wind socks are visible and in good condition. Updated emergency phone list in designated locations. Emergency procedures by phones in warehouses. Contingency plan in designated locations. Emergency exit routes are marked, unobstructed and exit signs lit. Rally points unobstructed and accessible with locks and keys working. Emergency lighting operating and in good condition. Buildings free of clutter and accumulated flammable materials. Fire lanes visible, unobstructed and in good condition.	Weekly

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Table III.D. – Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
CONTAINER STORAGE AREAS/STAGING AREAS	 Curbs, floor and floor coatings have no cracks, chips and gouges. Container racks in good condition and structurally sound. Pallets holding containers in good condition and structurally sound. No spills, collected liquids, or standing liquids. No emergency equipment or emergency exits blocked. Fire extinguishers in place and full charged. Safety showers and eyewash stations operating properly. Area clear of debris and trash. All lights illuminated. Aisles unobstructed and two foot spacing maintained. Trailer and truck wheels chocked. Satellite drums closed, properly labeled/marked, not full and no clutter/debris around area. 	Daily (except weekends and holidays)

Table III.D. – Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
CONTAINERS	 Proper approved container used. No leaking or waste on the outside of drums or containers. No spills or standing liquids. No damaged, corroded, or rusted containers. Lids, Rings, Bungs, Valves, Ties, Flaps, etc. closed per US DOT standards. Containers properly secured on pallets or by other means. Labels/Markings correct, legible and facing out. Containers not stacked more than three (3) high. Bulk containers have proper markings. Exempt packages follow all requirements. Incompatible wastes are properly segregated and placed in properly designated Storage Units. 	Daily (except weekends and holidays)

Table III.D. – Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
TANKS AND ANCILLARY COMPONENTS	 Overfill prevention equipment fully functional. This includes, but is not limited to, high-level alarms, automatic feed shutoffs, and emergency relief valves. Tanks, piping, valves, fittings, pumps, and foundations/supports have sufficient integrity to continue operational activities. Instrumentation, including but not limited to, flow indicators and temperature/pressure gauges, are fully functional and not transmitting abnormal information. Secondary containment system is free of cracks, gouges, chips or deterioration that could cause a physical release. Secondary containment system lining is not deteriorated such that a release could be possible. Sump system is functional with no excess accumulations. No standing water or spills. Waste loading/unloading areas are free of cracks or deterioration that could cause a possible release. Waste loading/unloading areas are free of standing liquids or spills. 	

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Table III.D. – Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
SAFETY EQUIPMENT	 All signs are in specified locations, clearly visible and in good condition. All spill cabinets and spill kits are fully stocked and in specified locations. Emergency monitoring equipment is operational and calibrated. SCBAs and egress bottles are functional, fully charged and in specified locations. First Aid and Blood Borne Pathogen kits are stocked and in specified locations. Phones, intercoms, horns and fire alarms are operating and in specified locations. Shelter-In-Place signs and kits all fully stocked and in specified locations. Fire pump and foam house inspections completed. Monthly eye wash stations and fire extinguisher inspections complete. Fire hydrants are not blocked and are clearly visible. 	Weekly
SECURITY	 Fence and barbed wire in place, no gaps and in good condition. All perimeter signs in place and visible from 25 feet. Gates operating, locked (if appropriate) and in good condition. Perimeter and parking lot lights all operational. Visitor orientation, check in procedures and safety rules being followed. 	Weekly

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Table III.D. – Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
FIRE AND EVACUATION ROUTES	 Evacuation signs posted, legible, not obstructed and in designated locations. All wind socks are visible and in good condition. Updated emergency phone list in designated locations. Emergency procedures by phones in warehouses. Contingency plan in designated locations. Emergency exit routes are marked, unobstructed and exit signs lit. Rally points unobstructed and accessible with locks and keys working. Emergency lighting operating and in good condition. Buildings free of clutter and accumulated flammable materials. Fire lanes visible, unobstructed and in good condition. 	Weekly



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Table IV.A. - Waste Management Information

Waste Type(s)	Source	Volume (tons/year)
N/A		



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Table IV.B. - Wastes Managed In Permitted Units

		•	
No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
101	Inorganic Liquid	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
102	Organic Liquid	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
103	Lab Packs	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
104	Inorganic Sludge	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
105	Organic Sludge	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
106	Inorganic Solid	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
107	Organic Solid	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
108	Containerized Gas	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
101	Inorganic Liquid	See codes below (2)	All Form codes indicated by waste type classified as hazardous or class 1
102	Organic Liquid	See codes below (2)	All Form codes indicated by waste type classified as hazardous or class 1
108	Containerized Gas	See codes below (2)	All Form codes indicated by waste type classified as hazardous or class 1

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Revision No. θ 1

Revision Date May 29 August 21,

2020

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Table IV.B. - Wastes Managed In Permitted Units

		_	
No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
101	Inorganic Liquid	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
102	Organic Liquid	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
103	Lab Packs	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
104	Inorganic Sludge	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
105	Organic Sludge	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
106	Inorganic Solid	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
107	Organic Solid	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
108	Containerized Gas	All appropriate permitted EPA Waste codes (1)	All Form codes indicated by waste type classified as hazardous or class 1
101	Inorganic Liquid	See codes below (2)	All Form codes indicated by waste type classified as hazardous or class 1
102	Organic Liquid	See codes below (2)	All Form codes indicated by waste type classified as hazardous or class 1
108	Containerized Gas	See codes below (2)	All Form codes indicated by waste type classified as hazardous or class 1

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Table IV.C. - Sampling and Analytical Methods

Revision 1, August 22, 2020

		1				
Waste No. ¹	Sampling Location	Sampling Method ²	Frequency	Parameter	Test Method ²	Desired Accuracy Level ³
101 102	Generator's site or container storage area 001, 002, or 003. These are the primary sampling locations only.	COLIWASA or sampling valve (for tank samples). ² See WAP for additional methods - certain test methods have been modified as indicated in the WAP.	One per shipment or blend/batch unless exempted by WAP	Fingerprint Analysis: Physical description pH/ water reactivity Ignitability screen Supplemental analysis: Specific gravity Bulk density Halogens Acid scrub Reactive cyanides/ sulfides 22Not all parameters apply to each sample: see WAP for more details.	Visual observation SW 846, 9045C SW 846 1020 Mod. ASTM D1298 ASTM D5057 ASTM D2361 mod. EPA 305.2 SW-846 9010/9030	Duplicates must match ± 1.0 S.U. duplicates must match ± 0.1 ± 20% ± 10% ± 10% ± 15%
104 105	Generator's site or container storage area 001, 002, or 003. These are the primary sampling locations only.	COLIWASA or tubing. 2See WAP for additional methods - certain test methods have been modified as indicated in the WAP.	One per shipment or blend/batch unless exempted by WAP	See Waste No. 101 above. ² Not all parameters apply to each sample see WAP for more details.	See Waste No. 101 above	See Waste No. 101 above

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Table IV.C. - Sampling and Analytical Methods

Revision 1, August 22, 2020

Waste No. ¹	Sampling Location	Sampling Method ²	Frequency	Parameter	Test Method ²	Desired Accuracy Level ³
101 102	Generator's site or container storage area 001, 002, or 003. ² These are the primary sampling locations only.	COLIWASA or sampling valve (for tank samples). ² See WAP for additional methods - certain test methods have been modified as indicated in the WAP.	One per shipment or blend/batch unless exempted by WAP	Fingerprint Analysis: Physical description pH/ water reactivity Ignitability screen Supplemental analysis: Specific gravity Bulk density Halogens Acid scrub Reactive cyanides/ sulfides ² Not all parameters apply to each sample - see WAP for more details.	Visual observation SW 846, 9045C SW 846 1020 Mod. ASTM D1298 ASTM D5057 ASTM D2361 mod. EPA 305.2 SW-846 9010/ 9030	Duplicates must match ± 1.0 S.U. duplicates must match ± 0.1 ± 20% ± 10% ± 10% ± 15%
104 105	Generator's site or container storage area 001, 002, or 003. These are the primary sampling locations only.	COLIWASA or tubing. ² See WAP for additional methods - certain test methods have been modified as indicated in the WAP.	One per shipment or blend/batch unless exempted by WAP	See Waste No. 101 above. ² Not all parameters apply to each sample - see WAP for more details.	See Waste No. 101 above	See Waste No. 101 above

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Table III-2 - Hazardous Waste Management Unit Checklist

Waste Management Unit	TCEQ N.O.R. Unit Number	Status ¹	Design Capacity (gallons)	Number of Years Utilized	Date in Service
Warehouse I Container Storage Area	<u>00</u> 1	Active	403,960	32	4/6/1988
Warehouse II Container Storage Area	<u>00</u> 3	Active	264,970	30	8/29/1989
Warehouse III Container Storage Area	<u>00</u> 4	Active	395,340	30	7/12/1990
Chemical Reactor Tank: R-1	<u>0</u> 26	Active	200	13	6/4/2007
Chemical Reactor Tank: R-1A	<u>0</u> 27	Active	500 / 1,500 (Proposed)	15	4/18/05
Cylinder Release Unit 1	<u>0</u> 28	Active	19,800 Cubic Ft per hour *	15	3/25/2005
Cylinder Release Unit 2	32	Proposed	*	NA	NA
Bulk Container Storage Area	<u>0</u> 33	Proposed	181,777	NA	NA

Notes:

[1] Indicate only one of the following: Active, Inactive, Closed, or Proposed

TCEQ - Texas Commission of Environmental Quality

NA - not applicable

N.O.R. - Notice of Registration

^{*} Unit is a series of tubing, piping and valves from the cylinder connection to the atmosphere with no capacity to measure regarding storage or possessing - it is direct a release unit.

Table III-2 - Hazardous Waste Management Unit Checklist

Waste Management Unit	TCEQ N.O.R. Unit Number	Status ¹	Design Capacity (gallons)	Number of Years Utilized	Date in Service
Warehouse I Container Storage Area	001	Active	403,960	32	4/6/1988
Warehouse II Container Storage Area	003	Active	264,970	30	8/29/1989
Warehouse III Container Storage Area	004	Active	395,340	30	7/12/1990
Chemical Reactor Tank: R-1	026	Active	200	13	6/4/2007
Chemical Reactor Tank: R-1A	027	Active	500	15	4/18/05
Cylinder Release Unit 1	028	Active	19,800 Cubic Ft per hour *	15	3/25/2005
Bulk Container Storage Area	033	Proposed	181,777	NA	NA

Notes:

TCEQ - Texas Commission of Environmental Quality

NA - not applicable

N.O.R. - Notice of Registration

^[1] Indicate only one of the following: Active, Inactive, Closed, or Proposed

^{*} Unit is a series of tubing, piping and valves from the cylinder connection to the atmosphere with no capacity to measure regarding storage or possessing - it is direct a release unit.

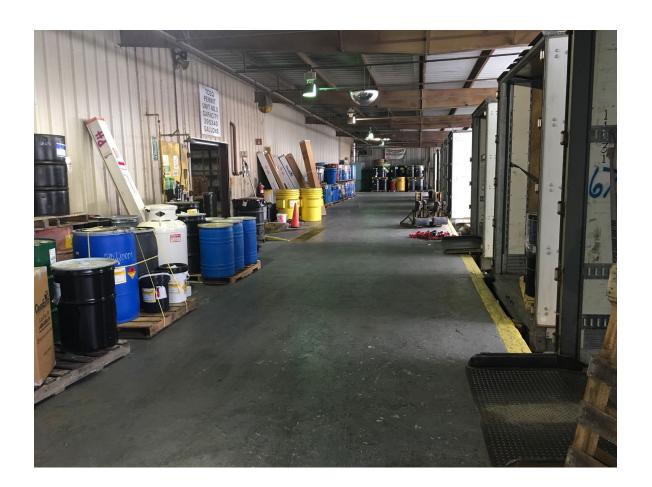
Clean Harbors La Porte, LLC RCRA Permit Application PART A ATTACHMENT D - FACILITY PHOTOS

- 1. WAREHOUSE I NORTH
- 2. WAREHOUSE I WEST
- 3. WAREHOUSE I CYLINDER RELEASE UNIT
- 4. WAREHOUSE I R1 REACTOR TANK
- 5. WAREHOUSE I R1A REACTOR TANK
- 6. WAREHOUSE II NORTH
- 7. WAREHOUSE II SOUTH
- 8. WAREHOUSE II WEST
- 9. WAREHOUSE II BIOMED WASTE PROCESSING AREA
- 10. WAREHOUSE III EAST
- 11. WAREHOUSE III SOUTH
- 12. WAREHOUSE III HIGH HAZARD VAULT
- 13. PROPOSED LOCATION IN WAREHOUSE HI FOR ADDITIONAL CYLINDER RELEASE UNIT
- 14.13. WAREHOUSE III LOADING DOCK
- 15.14. OUTDOOR STORAGE AREA (for 28 roll-off box storage-permitted; not constructed)

Clean Harbors La Porte, LLC RCRA Permit Application PART A ATTACHMENT D - FACILITY PHOTOS

- 1. WAREHOUSE I NORTH
- 2. WAREHOUSE I WEST
- 3. WAREHOUSE I CYLINDER RELEASE UNIT
- 4. WAREHOUSE I R1 REACTOR TANK
- 5. WAREHOUSE I R1A REACTOR TANK
- 6. WAREHOUSE II NORTH
- 7. WAREHOUSE II SOUTH
- 8. WAREHOUSE II WEST
- 9. WAREHOUSE II BIOMED WASTE PROCESSING AREA
- 10. WAREHOUSE III EAST
- 11. WAREHOUSE III SOUTH
- 12. WAREHOUSE III HIGH HAZARD VAULT
- 13. WAREHOUSE III LOADING DOCK
- 14. OUTDOOR STORAGE AREA (for 28 roll-off box storage-permitted; not constructed)

Photo 13 Photo 14







Clean Harbors La Porte, LLC, La Porte, TX EPA ID#: TXD982290140 Permit #: 50225 Revision 2; 8/21/2020

Signature Page

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

Operator Signature: Date: 8/19/2020
Name and Official Title (type or print): <u>James Childress / VP of Environmental Compliance</u>
Owner Signature: Date:
Name and Official Title (type or print): <u>James Childress / VP of Environmental Compliance</u>
To be completed by the operator if the application is signed by an authorized representative for the operator
I, hereby designate (operator) (authorized representative)
as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.
Printed or Typed Name of Operator or Principal Executive Officer
Signature
(Note: Application Must Bear Signature & Seal of Notary Public)
Subscribed and sworn to before me by the said amed C. Children this
day of Mugust , 2020
My commission expires of the

TCEQ Part A Application TCEQ-0283 (Rev. 8/17/2017 A. Clark)



Clean Harbors La Porte, LLC, La Porte, TX EPA ID#: TXD982290140

Permit #: 50225 Revision 2; 8/21/2020

Signature Page	
I,James Childress	, V.P. Environmental Compliance
(Operator)	(Title)
direction or supervision in accordance of properly gather and evaluate the informations who manage the system, or the information, the information submitted accurate, and complete. I am aware the information, including the possibility of	cument and all attachments were prepared under my with a system designed to assure that qualified personnel nation submitted. Based on my inquiry of the person or ose persons directly responsible for gathering the lis, to the best of my knowledge and belief, true, ere are significant penalties for submitting false f fine and imprisonment for knowing violations.
<u> </u>	Date:8/19/2020
Representative for the Operator	f the application is signed by an Authorized
I,	, hereby designate
[Print or Type Name]	[Print or Type Name]
that I am responsible for the contents o	
Signature	
Notary Public i	f lugust, 2020 2 day of March, 2023





Clean Harbors La Porte, LLC 500 Independence Parkway South La Porte, Texas 77571 281.884.5500 www.cleanharbors.com

August 20, 2020

Gulay Aki, P.E., Section Manager Industrial & Hazardous Waste Permits Section Waste Permits Division Texas Commission on Environmental Quality 12100 Park 35 Circle, Building F Austin, Texas 78753

Re: RCRA Part B Permit Renewal Application – Removal of Proposed/Not Constructed WMUs Clean Harbors La Porte, LLC - LaPorte, Harris County Hazardous Waste Permit No. 50225; Industrial Solid Waste Registration No. 50225 EPA Identification No. TXD982290140 RN102949021/CN603661844

Dear Ms. Aki:

The referenced facility respectfully requests the following proposed Waste Management Units (WMUs) be removed from the subject permit renewal:

- Increased tank size (i.e., 1500 gallons) for Tank R-1A (NOR# 027); and
- Proposed Cylinder Release Unit 2 (NOR# 032).

C Mil

These units were previously permitted but never constructed, and the facility has removed them from the permit renewal application so that the aforementioned permitted but not constructed WMUs can be removed from the permit and NOR.

Please contact David DeSha at <u>desha.david@cleanharbors.com</u> or (423) 413-1218 with any questions or comments you have concerning this matter.

Sincerely,

James Childress

VP Environmental Compliance

Clean Harbors Environmental Services, Inc.



Dear Customer,

The following is the proof-of-delivery for tracking number: 396133550762

Delivery Information:

Status: Delivered To: Mailroom

Signed for by: A.WOODS Delivery Location: 12100 PARK THIRTY FIVE C

Service type: FedEx Priority Overnight AUSTIN, TX, 78753

Special Handling: Deliver Weekday Delivery date: Aug 25, 2020 12:28

Shipping Information:

Tracking number: 396133550762 **Ship Date:** Aug 24, 2020

Weight: 7.0 LB/3.18 KG

Recipient:

ATTN: GULAY AKI, MC 130, TCEQ, 12100 PARK 35 CIR BLDG F AUSTIN, TX, US, 78753

MC 130, TCEQ,

DAVID DESHA, CLEAN HARBORS
500 INDEPENDENCE PKWY S
LA PORTE, TX, US, 77571

Shipper:

FedEx FedEx