Texas Commission on Environmental Quality

Application for a Medical Waste Registration

TERRABELLA ENVIRONMENTAL SERVICES PLEASANTON RN110896578

Registration TBD

Pleasanton, Atascosa County, Texas

Initial Application Date: 31 MARCH 2020

Application Revision Date: NA

Prepared for

TERRABELLA ENVIRONMENTAL SERVICES INC

433 Zander Lane

Pleasanton, TX 78064

Prepared by

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Q&A Diversified, LLC

Texas Registered Engineering Firm F-15923

PO Box 761283

San Antonio, TX 78245

3/3/2020

RN110896578 Medical Processing Facility Initial Application Submittal Date (03/31/2020)

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Section 1— General Information

1.1	Facility Information (must match regulated entity information on
Core	Pata Form)

Facility Name: Terrabella Environmental Services Pleasanton					
Regulated Entity Refe	Regulated Entity Reference No. (if issued): RN110896578				
Physical or Street Add	Physical or Street Address (if available): 433 Zander Ln				
City: <u>Pleasanton</u>	County: <u>Atascosa</u>	State: TX	Zip Code: <u>78064</u>		
(Area Code) Telephone Number: <u>210-892-4496</u> Email Address: <u>mcarr@terrabellaes.com</u>					
Latitude (Degrees, Minutes, Seconds, or Decimal Degrees): 28° 58' 56.33" N					
Longitude (Degree, Minutes, Seconds, or Decimal Degrees): 98° 26' 32.30" W					
Activities Conducted a	at the Facility (check all th	at apply)			
	tment ⊠ Transfer	□ Other:			
Describe the location	of the facility with respect	to known or easily identif	iable landmarks:		
The facility is approxim (IH-37) with Corgey F	mately 0.65 miles northwe	est of the intersection of Ir	nterstate Highway 37		
Detail access routes fi	rom the nearest United Sta	ates or state highway to th	ne facility:		
	d on IH-37, take exit 109. Road, then turn left onto Z				
1.2 Applicant In	formation				
The owner of a facility	is the applicant, to whom	n the registration would be	e issued.		
Owner of Facility (must match customer information on Core Data Form)					
Owner Name: Terrabella Environmental Services Inc					
Contact Person's Name: Michael Carr Title: President					
Customer Reference N	No. (if issued): CN <u>6043349</u>	904			
Mailing Address: PO B	ox 39				
City: <u>Leming</u>	County: <u>Atascosa</u>	State: <u>Texas</u>	Zip Code: <u>78050</u>		
(Area Code) Telephon	e Number: 210-892-4496	Email Address: mcar	r@terrabellaes.com		

Operator of Facility (if not the same as Owner of Facility) Operator Name: Same as Owner Contact Person's Name: ______ Title: Customer Reference No. (if issued): CN______ Mailing Address: City: _____ State: ____ Zip Code: _____ (Area Code) Telephone Number: _____ Email Address: _____ **Consultant (if applicable)** Firm Name: Q&A Diversified LLC Texas Board of Professional Engineers Firm Registration Number: F-15923 Contact Person's Name: <u>Hilda Quinones</u>, P.E. ___ Title: <u>President</u> Texas Board of Professional Engineers License Number (if applicable): 111655 Mailing Address: PO Box 761283 City: San Antonio County: Bexar State: Texas Zip Code: 78245 (Area Code) Telephone Number: 210-896-8711 Email Address: hildag@gnadiversified.com 1.3 Governmental Entities Information **Texas Department of Transportation** District: San Antonio District Engineer's Name: Mario R. Jorge, PE Street Address or P.O. Box: 4615 NW Loop 410 City: San Antonio County: Bexar State: TX Zip Code: 78229 (Area Code) Telephone Number: 210-615-1110 Email Address: Local Government Authority Responsible for Road Maintenance (if applicable) Agency Name: TXDOT Pleasanton Office Contact Person's Name: Clint Rodriguez

City: Pleasanton County: Atascosa State: TX Zip Code: 78064

(Area Code) Telephone Number: 830-281-5384 Email Address:

Street Address or P.O. Box: 2154 S. Second St.

City Mayor
City Name: Pleasanton
City Mayor's Name: <u>Travis Hall, Jr.</u>
Mailing Address: 108 Second St.
City: Pleasanton County: Atascosa State: TX Zip Code: 78064
(Area Code) Telephone Number: 830-569-3867 Email Address: mayor@pleasantontx.gov
Council of Governments (COG)
COG Name: Alamo Area Council of Governments (AACOG)
COG Representative's Name: The Honorable Robert L. Hurley
COG Representative's Title: County Judge, Atascosa County
Street Address or P.O. Box: 8700 Tesoro Dr, Suite 160
City: San Antonio County: Bexar State: TX Zip Code: 78217
(Area Code) Telephone Number: 210-362-5260 Email Address:
Local Government Jurisdiction
Is the facility located outside the territorial limits or extraterritorial jurisdiction of a city or town? (30 TAC §326.67(a)) Yes \boxtimes No \square
If yes, and county requires a license, you must obtain a license from the county, and the county must send a copy of the license to the appropriate TCEQ regional office.
City Health Authority (if applicable)
Agency Name: Defer to the Texas Department of State Health Services (TDSHS)
Contact Person's Name: Gale Morrow, MPH, MCHES
Street Address or P.O. Box: 7430 Louis Pasteur Dr
City: San Antonio County: Bexar State: TX Zip Code: 78229
(Area Code) Telephone Number: 210-949-2000 Email Address:
County Judge Information
County Judge's Name: The Honorable Robert L. Hurley
Street Address or P.O. Box: 1 Courthouse Circle Dr, Suite 206
City: <u>Jourdanton</u> County: <u>Atascosa</u> State: TX Zip Code: <u>78026</u>
(Area Code) Telephone Number: 830-769-3093 Email Address:

County Health Authority (if applicable) Agency Name: Defer to the Texas Department of State Health Services (TDSHS) Contact Person's Name: Gale Morrow, MPH, MCHES Street Address or P.O. Box: 7430 Louis Pasteur Dr City: San Antonio County: Bexar State: TX Zip Code: 78229 (Area Code) Telephone Number: 210-949-2000 Email Address: **State Representative** House District Number: 31 Representative's Name: Ryan Guillen District Office Address: 1411 Bensdale Rd, Room 108 City: Pleasanton County: Atascosa State: TX Zip Code: 78064 (Area Code) Telephone Number: 830-569-4222 Email Address: **State Senator** Senate District Number: 19 State Senator's Name: Pete Flores District Office Address: 1 University Way, TAMU SA - CAB Room 354 City: San Antonio County: Bexar State: TX Zip Code: 78224 (Area Code) Telephone Number: 210-784-5024 Email Address: _____ 1.4 Posting of Application on Website [30 TAC §326.69(e)] Provide the web address (URL) of the publicly accessible internet website where the application and all revisions will be posted: http:// https://www.gnadiversified.com/permits 1.5 Copy of Application for Public Viewing

City: Pleasanton County: Atascosa State: TX Zip Code: 78064

(Area Code) Telephone Number: 830-569-5901

Name of the Public Place: Pleasanton Public Library

Physical Address: 115 N Main St

1.6 Notice of Opportunity to Request Public Meeting

Notice Requirement

The owner or operator is required by 30 TAC §326.73 to provide notice of the opportunity to request a public meeting, and to post notice signs.

Indicate the party responsible for publishing notice:

1.7 Application Fee

Indicate how the application fee was paid. Attach a photocopy of the check or a copy of the electronic payment receipt.

Check □ Online ⊠

If paid online, e-Pay confirmation number: Voucher Numbers 461994 and 461995

1.8 Facility Supervisor's License [30 TAC §326.71(c)]

Indicate the type of license that the Solid Waste Facility Supervisor (as defined in 30 TAC Chapter 30), will obtain prior to commencing facility operations:

Class A □ Class B ⊠

Section 2— Facility Design Information

2.1 Impact on Surrounding Area [30 TAC §326.71(a)(5)(A) & (B)]

This section addresses the facility's impacts on cities, communities, groups of property owners, or individuals (attach additional pages to answer the following questions, if necessary):

Describe the character of the surrounding area land uses within one mile of the facility:

The facility site location is in a rural industrial/commercial area. Surrounding land uses within one (1) mile of the facility include industrial/commercial areas, residential areas, pasture land and undeveloped areas. Large tracts and pasture land surround the immediate area of the facility. All access roads to the property are paved. Maps showing the general character of the areas adjacent to the facility, including public roads, towns and the nature of development of adjacent lands are shown in Attachment 3.

Identify growth trends within five miles of the facility with directions of major development:

An interview with the property owners and review of historic aerial imagery from 1996, 1999, 2010, 2018 and 2020, reveals limited growth within five miles of the facility. However, the area along Corgey Road (south) has experienced significant growth in the last five years. Commercial and industrial facilities have been developed at a high rate. Zander Lane appeared on the aerials around 2014, and several industrial developments have occurred to the south and west of the property since then.

Indicate the approximate number of residences and other uses (e.g. schools, churches, cemeteries, historic structures and commercial sites, etc.) within one mile of the facility:

There are no schools, daycares or hospitals within one mile. Two small cemeteries are located 0.5 miles west of the property along Corgey Road. There are also three churches and approximately 49 commercial sites, 77 residences, and zero historic structures. The nearest residence is located on the parcel that borders the property to the north approximately 30 LF from the edge of the property and 330 LF from the edge of lot 2 where a fence-line of the work area will be located.

Indicate the distance to the nearest residence(s):	30	$_{_} oxtimes$ feet \Box miles
Provide directions to the nearest residence(s):		

From Terrabella Environmental Services Inc located at 433 Zander Lane, head west on Zander Lane for 0.3 miles, then turn right on Corgey Road. Travel 0.5 miles, then turn right onto TX-97 E. Travel 0.3 miles and nearest residence will be on the right at 3269 TX-97, Pleasanton, TX 78064.

Indicate the distance to the nearest commercial establishment(s): $\underline{0} \boxtimes$ feet \square miles

Provide directions to the nearest commercial establishment(s):

The nearest commercial establishment is located on the parcel that borders the property to the west on Zander Lane.

2.2 Transportation [30 TAC §326.71(e)]

Access Roads

Complete Table 1 regarding the roads that will be used to access the site.

Table 1. Roads That Will be Used to Access the Site.

Name of Road	Surface Type and Number of Lanes
Zander Lane	Asphalt, 2 Lane
Corgey Road	Asphalt, 2 Lanes
TX-97 Interstate 37	Asphalt, 4 Lanes Asphalt, 4 Lanes

Daily Traffic Volume

Complete Table 2 regarding existing and expected volume of vehicular traffic on access roads within one mile of the facility, and the projected volume of traffic expected to be generated by the facility on access roads within one mile of the facility.

Table 2. Traffic Volume.

Vehicle Traffic	Volume (vehicles per day)	
Existing Vehicle Traffic	Zander Lane 2018 AADT 150	
	Corgey Road 2018 AADT 680	
	TX-97 2018 AADT 9,945	
	IH-35 2018 AADT 24,248	
Expected Vehicle Traffic	Zander Lane 2038 AADT 225	
	Corgey Road 2038 AADT 952	
	TX-97 2038 AADT 13,923	
	IH-35 2038 AADT 34,199	
Projected Vehicle Traffic Generated by Facility	Less than 50 per day	

Describe the source of or method used to obtain the volumes (attach additional pages to answer this question if necessary):

The TXDOT Statewide Planning Map viewer (https://www.txdot.gov/inside-txdot/division/transportation-planning/maps/statewide-planning.html) was accessed on

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March 23, 2020. The data reflects the 2018 annual average daily traffic (AADT) counts in vehicles per day and their locations.

If traffic volume was determined by counts in the field, indicate the locations where the counts were conducted (attach additional pages to answer this question if necessary):

NA

2.3	Floodplain and Wetlands	[30 TAC §326.71(f)
2.5	i looupialli alla Wetlallus	[30 170 325017 1(1)

2.4 Buffer Zones and Easement Protection [30 TAC §326.71(h)(3)]

is the buffer zone in any	location at the facility	y less than 25 feet	wide?
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Yes □ No ⊠

If yes, describe your alternative buffer zone and how it will allow access for emergency response and maintenance (attach additional pages to answer this question if necessary):

NA

2.5 Waste Management Unit Designs [30 TAC §326.71(i)]

Waste Management Unit Details

List each waste management unit in Table 3. Include attachments documenting manufacturer specifications.

Table 3. Design Details and Manufacturer Specifications for Waste Management Units.

Unit Type	Minimum Number of Units	Design Details	Approximate Dimensions	Approximate Capacity per Unit
Autoclave	2	Yes	Typical	3,000 lbs/hr
Boiler	1	No	Typical	NA
Container Wash	1	No	Typical	NA
Alternate Treatment Technology	1	Yes	Typical	Varies 400-2,000 lbs/hr
Refrigerated Containers	1	None. Typical semi-trailers and box trucks.	Varies (24ft to 50ft trailers/trucks)	Varies (30-130 cubic yards)

Foundations and Supports

Provide a generalized description of construction materials for slab and subsurface supports of all storage and processing components (attach additional pages to answer this question if necessary):

The facility building is supported on a reinforced concrete slab-on-grade foundation of sufficient thickness capable of supporting the building and waste processing activities.

Processing units and containerized waste will rest directly on the slab-on-grade building foundation. Specially designed slabs or subsurface supports are not required. Building slab details are provided in Attachment 2. Concrete slabs, curbs and walls will provide the required spill storage capacity. Minimum curb dimensions and spill containment calculations are also presented in Attachment 2.

Contaminated Water Management

Describe how storage and processing areas will be designed to control and contain spills and prevent contaminated water from leaving the facility. For unenclosed containment areas, also account for precipitation from a 25-year, 24-hour storm (attach additional pages to answer this question if necessary):

The facility will be constructed, maintained and operated to manage run-on and run-off during the peak discharge of a 25-year rainfall event and prevent off-site discharge of waste, including in-process and processed materials. Waste storage will occur in enclosed building in non-bulk containers and/or holding tanks located inside and outside the

processing building. Secondary containment curbing inside the building has been designed to manage run-on and run-off during peak discharge of a 25-year rainfall event.

The site operator will monitor the activities at the facility to ensure that no pollutants, solid waste, or non-point source pollution of the waters of the United States or Waters of the State, or adjacent to, occurs at any time.

To ensure that the facility is not endangered, the building and access roads will be located at least 100 feet from the flood plain.

The waste processing area is located inside the enclosed building with a concrete floor. The facility is designed so that surface water drainage, in and around the facility, will not run onto, into, or off the storage area from outside the building. Transport trucks are elevated which prevents surface water from running onto or into them.

Due to the processing of the waste inside the building and the packaging requirements of the waste, no surface water contamination from operations at this facility is anticipated.

CONTAMINATED WATER MANAGEMENT PLAN

DISPOSAL OF LIQUIDS

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

Contaminated water resulting from contact with untreated medical waste is not anticipated unless a spill occurs. In the event of a spill, the waste will be collected and placed into the treatment unit. Any contaminated water generated from contact with untreated medical waste resulting from a spill will be absorbed and managed as untreated medical waste and placed into the treatment unit.

Working surfaces, including containers, that have come in contact with untreated medical waste will be cleaned and/or sanitized. Process water resulting from routine cleaning and sanitizing activities in the building will be managed within the building and placed into the treatment unit or discharged into the City of Pleasanton sanitary sewer system. Cleaning and sanitizing of reusable containers may be conducted outside of the building within the covered area with concrete curbing. The concrete paving and curbing will prevent water

generated from cleaning and sanitizing in this area from being discharged off-site. The water generated from cleaning and sanitizing in this area will be controlled and directed by the concrete curbing and discharged to the City of Pleasanton sanitary sewer system via a drain located within the concrete curbing. Process water generated from condensation of autoclave steam will be discharged to the City of Pleasanton sanitary sewer system. Management of discharges will be in accordance with local requirements, and all necessary authorizations and approvals will be obtained and retained within the operating record at the site.

Waters not generated from the sanitation of surfaces in contact with untreated medical waste (i.e. water from restroom, office area) will be discharged to the City of Pleasanton sanitary sewer system.

COLLECTION OF CONTAMINATED WATER AND LEACHATE

Any contaminated water generated from contact with untreated medical waste resulting from a spill will be absorbed and managed as untreated medical waste and placed into the treatment unit. Process water resulting from routine cleaning and sanitizing activities will be absorbed (i.e. with cloth or paper towel) or collected (i.e. with mop and bucket) and either placed into the processing unit or discharged to the City of Pleasanton sanitary sewer system. Water generated from cleaning and sanitizing containers within the covered area will be contained by the concrete paving and curbing and discharged to the City of Pleasanton sanitary sewer system via a drain located within the concrete curbing. Contaminated water can be properly managed without collection units (i.e. storage tanks and/or lined units).

Waste will be stored inside the enclosed building, an enclosed transport vehicle/trailer or covered roll-off outside of building. Therefore, no contaminated water or leachate will occur outside of the building or transport vehicle/trailer and collection units will not be required.

<u>LEACHATE AND GAS CONDENSATE - This section is not applicable to this MSW Processing</u> Facility.

<u>SEPTIC DISCHARGE - No contaminated water will be discharged to a septic system.</u>

<u>OFF-SITE DISCHARGE - No contaminated water will be discharged off-site without specific written authorization under Texas Pollutant Discharge Elimination System (TPDES)</u> authority.

WASTEWATER DISCHARGE

<u>Wastewaters discharged to a treatment facility permitted under the Texas Water Code,</u> <u>Chapter 26 must not:</u>

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

OIL AND GREASE EFFLUENT

The concentration of oil and grease in the daily effluent leaving the facility and entering the public sewer system will not exceed 200 milligrams per liter, the concentration established by the treatment facility permitted under Texas Water Code, Chapter 26, or the National Pollutant Discharge Elimination System.

<u>LAGOONS</u>, <u>OPEN-TOP STORAGE TANKS</u>, <u>OPEN VESSELS</u>, <u>AND UNDERGROUND STORAGE - This facility is not a liquid waste transfer facility, therefore §330.207(h) is not applicable to this MSW Processing Facility.</u>

2.6 Treatment Requirements [30 TAC §326.71(j)]

Attach a written procedure for the operation and testing of any equipment used, and for the preparation of any chemicals used in treatment.

Medical waste shall be treated in accordance with the provisions of 25 TAC 1.136 (relating to Approved Methods of Treatment and Disposition).

GENERAL DESCRIPTION AND TREATMENT 326.71 (j)(1)

The processing area at the facility will be located within a fully enclosed metal building with closeable bay doors. The building has reinforced concrete floors and concrete parking areas outside. The building was designed in accordance with all applicable local building code and land development code requirements. The facility will be surrounded a four-foot barbed wire

<u>fence or a six-foot chain-link fence or equivalent with lockable gates. Refer to Attachment 2</u>
<u>- Facility Layout Map.</u>

No disposal operations will take place at the facility; only waste transfer, storage and processing. Solid waste will be transported into the facility in private or commercial collection vehicles. The containerized waste will be unloaded and visually inspected to verify shipping document/manifest information as well as proper labeling and packaging per State and Federal regulations. Packaging requirements for regulated medical waste received by this facility include, but are not limited to, the following: Texas Commission on Environmental Quality - 30 TAC 330.1207, United States Department of Transportation - 49 CFR 178, and Occupational Safety and Health Administration - 29 CFR 1910. In the event unauthorized waste is discovered prior to unloading, the waste will be rejected and returned to the generator via the transporter. The unloading of containerized waste will be confined to the processing area of the building. Untreated medical waste will be managed in accordance with the provisions of 25 TAC Subchapter K and 30 TAC Subchapter Y.

In the event that reusable sharps containers are received at the facility, the reusable sharps containers will be diverted to a sharps consolidation area. The containerized sharps will be taken to the autoclave unit for processing and the reusable sharps containers will be washed and returned to generators. Terrabella Environmental Services Inc may use an automated sharps container washer at the facility.

In the event untreated medical waste needs to be refrigerated, the applicant's registered transport refrigeration vehicles will be utilized. The size and capacity of the company's fleet of refrigeration vehicles may change from time to time due to increase/decrease in fleet size. Currently, the fleet includes, but is not limited to, 24 foot to 50 foot box trailers and trucks with capacities ranging from approximately 60 to 130 cubic yards. Terrabella Environmental Services Inc may also rent additional refrigeration units, if necessary.

The waste may be treated by steam sterilization or a Texas Department of Health approved alternate treatment technology. The two processes for the treatment of untreated medical waste that may be utilized at the facility are described below.

1. STEAM STERILIZATION: The steam sterilization system will consist of Bond-Tech autoclaves, or equivalent. Steam sterilization is a widely accepted waste processing system used in Texas for meeting regulations requiring medical waste to be treated and rendered non-infectious prior to the final disposal at an approved municipal solid waste landfill. The process consists of placing the untreated waste in a pressure vessel and forcing steam into the chamber and through the waste. When the waste is exposed to the proper temperatures as defined by the 25 Texas Administrative Codes for autoclave technology for the approved time, the waste will be rendered sterilized. The parameters of time, temperature and pressure of the steam sterilization system used at this facility will meet or exceed those required by the Department of State Health Services requirements for steam sterilization found in 25 TAC 1.133(b)(4)(8). Once the waste is sterilized, the treated waste will be stored on-site and then transported and disposed of at a TCEQ approved municipal solid waste landfill in accordance with 25 TAC 1.136 and 30 TAC 1219(b)-(e).

2. ALTERNATE TREATMENT TECHNOLOGY: Once the waste is received, the waste is transferred into a tub/cart and the net weight of the waste is electronically recorded. Once the waste has been placed on the lift and weighed, the operator engages the automated cart lift system and the lid covering the feed hopper is opened while the tub is raised and tilted to allow the waste to enter the feed hopper. As the hopper lid closes, the waste is drawn into the primary treatment chamber where the waste is treated using a Texas Department of Health approved chemical agent. The waste proceeds through the primary treatment chamber continually being shredded/macerated by the cutting blades.

After passing through the primary treatment chamber, the waste moves to the secondary treatment chamber which is located directly below the primary treatment chamber where the final mixing and shredding/maceration will occur. The treated waste is forced from the secondary chamber into the waste exit chute. The waste passes a pH probe prior to being deposited in a waste container. A pH reading below 11 or above 12.5 will result in an automated shut-down of the system. In the event an automated shut-down occurs, the operator shall capture the waste in the waste exit chute and place it in red bags to be reprocessed until an acceptable pH range is achieved. Once treated, the shredded/macerated, dry waste is considered routine municipal solid waste and will be disposed of at a TCEQ approved municipal solid waste landfill.

TESTING 326.71 (J)(2

The operator will conduct weekly biological testing for autoclaved waste to verify if waste has been treated in accordance with applicable rules.

DISPOSAL

Treated waste will be disposed in accordance with 30 TAC 326.41(c) and 25 TAC 1.136 in a permitted municipal solid waste landfill or other authorized disposal of processing facility.

An average transport frequency is expected to be five days. Waste shipments will be manifested.

Prior to shipment, the waste may be compacted, and all visible markings identifying the waste as medical waste will be covered with a label clearly identifying that the waste is treated medical waste. Treated sharps will be placed in containers designed for sharps and marked or labeled as containing treated waste. Treated medical waste that contains non-encapsulated hypodermic needles or syringes or intact red bags will be accompanied by a shipping document that includes a statement that the shipment contains such items and that these items have been treated in accordance with 25 TAC 1.136.

Section 3— Facility Closure

3.1 Closure Plan [30 TAC §326.71(k)]

The operator must comply with the closure requirements listed in 30 TAC §326.71(k).

List other activities that the facility will conduct during closure, if any (attach additional pages to answer this question if necessary):

The facility's closure plan is prepared in accordance with applicable portions of 30 TAC 326.71.

CLOSURE REQUIREMENTS

Waste Removal 326.71(1) - Upon closure, the owner or operator shall remove all waste, waste residue, and any recovered materials. All facility units shall be dismantled and removed off-site or decontaminated.

<u>Final Disposition of Waste 326.71(2) - The owner or operator will evacuate all untreated</u> <u>medical waste to a TCEQ authorized facility and disinfect all receiving, processing and post-processing areas. Final disposition of treated medical waste will be at an authorized facility.</u>

Facility Closure Completion 326.71(3) - Closure of the facility will be completed within 180 days following the last acceptance of processed or unprocessed materials unless otherwise directed or approved in writing by the executive director.

CERTIFICATION OF FINAL FACILITY CLOSURE 326.71 (I)

Public Notice 326.71(I)(1) - No later than 90 days prior to the initiation of final facility closure, Terrabella Environmental Services Inc, through a public notice in the newspaper(s) of largest circulation in the vicinity of the facility, will provide public notice for final facility closure. This notice will provide the name, address, and physical location of the facility; the registration number; and the last date of intended receipt of waste. Terrabella Environmental Services Inc will also make available an adequate number of copies of the approved final closure plans for public access and review.

Terrabella Environmental Services Inc will also provide written notification to the executive director of the intent to close the facility and place the notice of intent in the site operating record.

Signage 326.71(I)(2) - Terrabella Environmental Services Inc shall post a minimum of one sign at the main entrance and all other frequently used points of access for the facility

notifying all persons who may utilize the facility of the date of closing for the entire facility and the prohibition against further receipt of waste materials after the stated date. Further, suitable barriers shall be installed at all gates or access points to adequately prevent the unauthorized dumping of solid waste at the closed facility.

Required Submittals to Executive Director 326.71(I)(3) - Within ten days after completion of final closure activities of the facility, the owner and operator shall submit to the executive director by registered mail:

- (A) A certification, signed by an independent licensed professional engineer, verifying that final facility closure has been completed in accordance with the approved closure plan. The submittal to the executive director shall include all applicable documentation necessary for certification of final facility closure; and
- (B) A request for voluntary revocation of the facility registration.

3.2 Closure Cost Estimate [30 TAC §326.71(m)]

Provide itemized closure cost estimates in Table 4. The cost estimates must meet the requirements listed in 30 TAC §326.71(m).

Attach documents detailing any additional unit closure costs not itemized. Enter the total of those additional unit closure costs on line 13 of the closure cost worksheet in Table 4.

Table 4. Closure Cost Estimates Worksheet.

Item No.	Item Description	Unit of Measurement	Quantity	Unit Cost	Total Cost
1	Site Evaluation and Engineering Review	NA	1	1,200	1200
2	Bid Document and Procurement	NA	1	500	500
3	Contract Award and Administration	NA	1	1,000	1000
4	Clean-Up, Removal and Transport of Waste Stored On- Site	NA	1	10,000	10000
5	Disposal of Waste at an Authorized Facility	TON	50	26	1300
6	Waste Treatment	TON	50	200	10000
7	Process Units Dismantling	NA	1	1,440	1440

8	Wash Down and Disinfection of Facility and Processing Units	NA	1	1,440	1440
9	Vector Control	NA	1	100	100
10	Site Security	NA	1	100	100
11	Signs, Newspaper Notice and TCEQ Notice	NA	1	1,750	1750
12	Facility Inspection and Closure Certification by Licensed Engineer	NA	1	1,500	1500
13	Additional Storage and Processing Unit Closure Cost Items (describe in attachments)	NA	NA	NA	NA
14	Storage and Processing Unit Closure Costs Subtotal	NA	NA	NA	NA
15	Contingency Cost 15%	NA	NA	NA	4550
16	Total Closure Cost Estimate	NA	NA	NA	34880

Section 4— Site Operating Plan

4.1 General [30 TAC §326.75(a)]

Provide the function and minimum qualifications for each category of key personnel to be employed at the facility including supervisory personnel in the chain of command (attach additional pages to answer this question if necessary):

The facility will employ three categories of key personnel for day-to-day operations. These categories include:

Manager - The General Manager, Facility Manager or Manager's Designee. The manager's function in daily operations is to oversee daily facility operations and compliance, equipment maintenance and repair, training and personnel safety. The manager may act as a Waste Handler or Records Administrator if the need warrants. The minimum qualification for Manager is general facility and regulatory knowledge.

Waste Handler - The Waste Handler's function in daily operations is to control facility access and screen incoming waste. The Waste Handler operates the facility in compliance with the TCEQ approved Site Operating Plan as well as the company's Standard Operating Procedures which do not require a TCEQ authorization. Items under the Waste Handler's purview include but are not limited to: equipment operation, manage waste flow, container flow and facility housekeeping. The Waste Handler may act as Records Administrator or Manager if the need warrants. The minimum qualification for Waste Handlers is general facility and regulatory knowledge.

Records Administrator -The Records Administrator controls recordkeeping and reporting. They assist with maintaining the facility operating record as described in §326.7S(e). The Records Administrator may act as the Waste Handler or Manager if the need warrants. The minimum qualification for Records Administrators is general facility and regulatory knowledge.

A trained facility employee will be responsible for accepting and directing the transport of all wastes and being at the unloading area each time that waste is unloaded.

As the trucks and containers enter the building for delivery, the load will be visually checked for appropriate waste packaging by trained employees for unauthorized or prohibited waste before processing. If the load is characteristic of an authorized waste and appears to conform to the waste designated on the manifest or bill of lading, the vehicle will be directed to the unloading area.

If the waste appears to be unrepresentative of the source designated on the documentation accompanying the load, if it is suspected or confirmed as containing an unauthorized, unknown, hazardous or PCB waste, or if the contents are determined to be incompatible with facility operations, it will not be unloaded, and the transporter will remove the waste from the site. The observation and analysis results for such loads will be documented and kept in the site records.

Appropriate signs and all-weather access routes to the unloading area will be used to indicate where trucks can unload.

The unloading of any hazardous waste or prohibited waste at this facility shall not be allowed. Any hazardous waste or prohibited waste identified shall be segregated and returned promptly to the transporter or generator of the waste.

The unloading of waste in unauthorized areas is prohibited. The owner or operator shall ensure that any waste deposited in an unauthorized area will be removed immediately and disposed of properly. The unloading of the waste will be confined to as small an area as practical. If the site operator becomes aware that hazardous wastes have been inadvertently accepted, he will immediately contain the accepted waste by terminating waste flow and will return it to the transporter or generator if practical, or contact a company licensed and permitted to handle and dispose of such wastes. The TCEQ will be immediately notified if any prohibited or unauthorized wastes are accidentally accepted. Records of the notification will be kept in the site operating record and will include the date and time of notification, the individual contacted, and the information reported.

At the time of this application, Mr. Michael Carr is the Operations Director who will be responsible for operating the facility. Mr. Carr has 28 years of management experience in the liquid waste and industrial waste processing business. Mr. Carr holds a Class B MSW license. Mr. Aaron Campbell is the Facility Manager / Operator that will be responsible for the operating of the facility. Mr. Campbell has 23 years of management experience in the liquid waste and industrial waste processing business.

Describe the procedures that the operating personnel will follow for the detection and prevention regarding the receipt of prohibited wastes, including random inspections of packaging of incoming loads, records, and training (attach additional pages to answer this question if necessary):

Various procedures to detect and control the receipt of prohibited wastes will be implemented at the facility. These procedures include but are not limited to: 1) random inspections of packaging for incoming loads; 2) recording inspections and inspection results; 3) training for appropriate facility personnel responsible for inspecting or observing loads to recognize prohibited waste and informing facility customers of prohibited wastes. Facility personnel may inform waste transportation drivers of facility requirements and screening for prohibited wastes. Information regarding the prohibited wastes may be posted on facility signs or provided as a written list to customers and drivers.

<u>If facility personnel identify prohibited waste or portions of prohibited waste within a collection vehicle, that vehicle or portions of waste within that vehicle will be rejected and immediately sent back to the waste generator.</u>

4.2 Waste Acceptance [30 TAC §326.75(b)]

Describe all sources and characteristics of medical wastes to be received for storage and processing or disposal (attach additional pages to answer this question if necessary):

The facility will process, store and transfer medical waste, outdated/off specification pharmaceuticals and seized drugs. Sources of these waste streams include hospitals, clinics, nursing homes, and other health care related facilities. In addition to these waste streams, the facility may accept Animal and Plant Health Inspection Services (APHIS) and International Maritime Pollution Protocol (MarPol) wastes. Prior to accepting APHIS and/or MarPol wastes, the facility will seek approval from the Administrator of APHIS. The facility may also receive municipal solid waste (MSW) that would be classified as medical waste if it were generated by health care-related facilities as identified in 326.61(h). After the receipt of MSW as previously described, the waste will be subjected to the same requirements as regulated medical waste.

Regulated medical waste will be received in approved Federal and State required packaging. Packaging requirements for regulated medical waste received by this facility include, but are not limited to, the following: Texas Commission on Environmental Quality - 30 TAC 326.19 relating to Packaging, 30 TAC 326.21 relating to Labeling Containers Excluding Sharps, United States Department of Transportation - 49 CFR Part 78, and Occupational Safety and Health Administration - 29 CFR Part 1910.

Describe the sources and characteristics of recyclable materials, if applicable, to be received for storage and processing (attach additional pages to answer this question if necessary):

<u>Information required by this provision is not applicable to this MSW Facility. No liquid or solid waste will be recycled at this time.</u>

Maximum amount of waste to be received daily: $50 \square$ pounds/day \square tons /day
Maximum amount of waste to be stored at any point in time: $\underline{50} \square$ pounds \boxtimes tons
Maximum length of time waste is to remain at the facility: $\underline{182} \ \Box$ hours \boxtimes days
Specify the maximum time that unprocessed and processed wastes will be allowed to remain on-site:
Processed: 30 □ hours ⊠ days
Unprocessed: 182 □ hours ☒ days

Identify the intended disposition of processed and unprocessed waste received at the facility (attach additional pages to answer this question if necessary):

<u>Treated waste will be sent to a TCEQ approved municipal solid waste landfill for disposal.</u>

<u>Untreated medical waste will be managed in accordance with 25 TAC Subchapter K and all applicable sections found in 30 TAC Chapter 326.</u>

4.3 Generated Waste [30 TAC §326.75(c)]

Describe how all liquids and solid waste resulting from the facility operations will be disposed of in a manner that will not cause surface water and groundwater pollution (attach additional pages to answer this question if necessary):

All liquids resulting from the operation of the facility will be disposed of in a manner that will not cause surface water or groundwater pollution. The operator will provide for authorized disposal of wastewaters resulting from managing the waste or from cleaning and washing by transport to a wastewater facility. Contaminated water will not be discharged.

All process and wash water will be either placed back into the processing unit or will be discharged to the City of Pleasanton sanitary sewer system. Management of process water will be in accordance with Local, State, and Federal requirements. All necessary authorizations and approvals will be obtained and retained within the operating record at the site.

Effluent from the facility will be analyzed annually for TPH, fats, oil and grease, and pH. Records of each analysis will be maintained at the facility for a minimum of three years. Sampling and analysis will be done according to EPA-approved methods.

The waste processing area is located inside the enclosed building with a concrete floor. The facility is designed so that surface water drainage, in and around the facility, will not run onto, into, or off the storage area from outside the building. Transport trucks are elevated which prevents surface water from running onto or into them.

Contaminated water resulting from contact with untreated medical waste is not anticipated unless a spill occurs. In the event of a spill, the waste will be collected and placed into the treatment unit. Any contaminated water generated from contact with untreated medical waste resulting from a spill will be absorbed and managed as untreated medical waste and placed into the treatment unit.

Solid wastes generated by the facility are characterized as municipal solid waste. Solid wastes treated at the facility can be adequately managed by TCEQ or other appropriate agency approved MSW processing facilities.

Due to the processing of the waste inside the building and the packaging requirements of the waste, no surface water or groundwater contamination from operations at this facility is anticipated. The site operator will monitor the activities at the facility to ensure that no pollutants, solid waste, or non-point source pollution occurs at any time.

4.4 Access Control [30 TAC §326.75(g)]

Describe how public access to the facility will be controlled (attach additional pages to answer this question if necessary):

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

Describe how access roads and parking areas will be maintained to control dust and prevent mud from being track off-site (attach additional pages to answer this question if necessary):

The facility access road is a two-lane, paved road designed for the expected traffic flow.

There are adequate turning radii for all transport vehicles that will utilize the facility. Parking will be provided for transport trucks/trailers, employees and visitors.

The all-weather surfaces within the facility will be maintained to control dust and mud.

The on-site area to be used by transport vehicles will be paved or gravel. In the event there is a problem related to windblown dust, water will be used to control windblown dust. Within the facility, a standard garden hose connected to an on-site water source may be sufficient to apply water.

The tracking of mud onto public roadways from the processing facility is not anticipated due to the access roads and on-site road being paved. All-weather surfaces will be maintained to prevent/minimize the tracking of dust and mud onto public access roads.

Access to the facility will be controlled by a perimeter fence, with lockable gates. Identify or describe the type of fence that will be installed at the facility:
□ A four-foot-high barbed wire fence;
☐ A six-foot-high chain-link fence; or

☑ Other: Access to the registration boundary will be controlled by a perimeter fence with lockable gates. The perimeter fence will consist of a four-foot barbed wire fence or a six-foot chain-link fence or equivalent. Waste storage will be located within the perimeter fencing and/or processing building but will not be located within the buffer zone or any easements or right-of-way crossing the facility.

4.5 Operating Hours [(30 TAC §326.75(i)]

Provide the operating hours of the facility; *include justification for hours outside of* **7:00** *a.m. to* **7:00** *p.m.*, *Monday through Friday*:

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

List the alternative operating hours, if any, of up to five days in a calendar-year period:

<u>Terrabella Environmental Services Inc does not anticipate the need for alternative operating hours for special occasions, special purpose events, holidays, or other special occurrences as this facility is approved for 24 hours per day, seven days per week.</u>

Section 5— Other Site Operating Plan, Financial Assurance, and Closure Requirements

Attach additional pages describing how the facility will comply with the following requirements.

30 TAC §326.75(d), Storage

Storage of Solids Waste Requirements 326.75 (d) (1)(2)

Waste will be stored in a secure manner and location that affords protection from theft, vandalism, inadvertent human or animal exposure, rain, water, and wind. Solid wastes will be stored in a manner that does not constitute a fire, safety, or health hazard, provide food or harborage for animals and vectors or generate noxious odors. Solid waste will be contained as not to result in litter.

Untreated medical waste may be temporarily stored at the site unrefrigerated for a time period not to exceed 72 hours. For untreated medical waste held longer than 72 hours, the waste will be stored at a temperature of 45 degrees Fahrenheit or less.

Windblown litter is not anticipated at the waste processing facility. Medical waste, or other approved waste, transported to the site must be packaged/containerized according to state/federal requirements. Waste will be unloaded within the building or loading/unloading dock area. In the event of heavy winds, the overhead doors of the building may be closed to minimize the potential for windblown waste and/or litter. When windblown litter is found, it will be picked up at least once per day on the days the facility is in operation to minimize unhealthy, unsafe, or unsightly conditions. A portable fence, perimeter fencing, or other suitable practice may be employed to confine windblown material resulting from operations, as needed.

Containers Storage of Solids Waste 326.75 (d)(3)

Containers shall be of suitable strength to minimize animal scavenging or rupturing during the collection process. Reusable containers will be maintained in a clean condition so that the containers used for wastes do not constitute a nuisance and to retard the harborage, feeding and propagation of vectors. Containers to be mechanically handled will be designed to prevent spillage or leakage during storage, handling, or transport.

30 TAC §326.75(e), Recordkeeping and Reporting

Recordkeeping and Reporting Requirements 326.75(e)(1)

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

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

1. Any and all applicable location-restriction demonstrations.

- 2. Inspection records and training procedures.
- 3. Closure plans and any monitoring, testing, or analytical data relating to closure requirements.
- 4. All cost estimates and financial assurance documentation relating to financial assurance for closure.
- 5. Copies of all correspondence and responses relating to the operation of the facility, modifications to the registration, approvals, and other matters pertaining to technical assistance.
- 6. All documents, manifests, shipping documents, trip tickets, etc., involving special waste.
- 7. Any other document(s) as specified by the approved authorization or by the Executive Director.

Signatory Requirements 326.75 (e)(3)

For signatories to reports, the following conditions apply.

Signing of Reports 326.75 (e)(3)(a)

The owner or operator will sign all reports and other information requested by the Executive Director as described in 30 TAC 305.128 or by a duly authorized representative of the owner or operator. Authorization of the duly authorized representative will be in accordance with 305.44(a) of this title.

Assignment of New Signatory 326.75 (e)(3)(b)

If an authorization under this section is no longer accurate because of a change in individuals or position, a new authorization will be submitted to the Executive Director prior to, or together with, any reports, information, or applications to be signed by an authorized representative.

Signatory Certification Statement 326.75 (e)(3)(c)

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

Records Availability 326.75 (e)(4)

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

Records Retention 326.75 (e)(5)

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

Alternate Recordkeeping Schedule 326.75 (e)(6)

The Executive Director may set alternative schedules for recordkeeping and notification requirements as specified in in 326.75 (e) 1-5.

Transportation 326.75 (e)(7)

In accordance with 30 TAC 330.1211, transporters must provide documentation of each waste shipment from the point of collection through and including the unloading of the waste at a facility authorized to accept the waste.

Owners or operators of a medical waste processing facility accepting delivery of untreated medical waste for which a shipping document is required for processing shall ensure each of the following requirements are met:

- When accepting delivery of untreated medical waste for which a shipping document/manifest is required under 30 TAC 330.1211, the owner or operator will ensure each shipment is accompanied by a shipping document which designates the processing facility to receive the waste. The owner or operator will sign the shipping document/manifest and immediately give at least one copy of the signed shipping document to the transporter.
- 2. The primary transporter will certify receipt of the waste, and the name and TCEQ number of the transfer station will be provided if transfer of waste occurs.
- 3. A copy of the shipping document will be retained showing receipt by a secondary transporter, if applicable, or the treatment facility.
- 4. The original shipping document will accompany each shipment of untreated waste to its final destination.
- 5. Shipping documents will contain the information required by 30 TAC 330.1211 (h).
- 6. Within 45 days after the delivery, the owner or operator will send a written or electronic copy of the shipping document to the generator. The shipping document/manifest will include a statement that the waste was treated in accordance with 25 TAC 1.136.
- 7. Copies of waste shipping documents will be maintained for three years in the main transporter office.

30 TAC §326.75(f), Fire Protection Plan

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

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

- 1. Fire Prevention Procedures
 - No burning will be permitted at the site.
 - ♦ No smoking will be allowed in the waste storage areas.
- 2. Source of Fire Protection

- ♦ Fire extinguishers will be kept within the building as required by the local fire code and all other applicable regulations. Once an extinguisher has been used, it will be refilled or replaced prior to returning it to its proper location. Each extinguisher will be installed and maintained in accordance with NFPA 10, or as amended.
- ♦ Fire extinguishers will be rated as ABC extinguishers.
- ♦ Fire extinguishers will be tagged and inspected on an annual basis and recharged as necessary.
- Smoke detector(s) will be placed in the building.
- ♦ The City of Pleasanton will be a primary source of fire protection. 2012 International Fire Code as adopted by the City of Pleasanton.

3. Employee Training and Safety Procedures

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

4. General Rules for Fire Fighting

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

Name of Company: Terrabella Environmental Services Pleasanton

Address: 433 Zander Lane, Pleasanton, TX 78064

Nearest Cross Street(s): Zander Lane and Corgey Road

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

30 TAC §326.75(g), Access Control

Public Access Control 326.75(g)(1)

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

30 TAC §326.75(g)(2), Access Roads, Vehicle Parking, and Safety Measures

Facility Access Road 326.75(g)(2)

The facility access road is a two-lane, paved road designed for the expected traffic flow. There are adequate turning radii for all transport vehicles that will utilize the facility. Parking will be provided for transport trucks/trailers, employees and visitors.

The all-weather surfaces within the facility will be maintained to control dust and mud. Incoming waste will be off loaded directly into the facility building or into another transfer vehicle/trailer, therefore safety bumpers will not be provided.

The on-site area to be used by transport vehicles is paved. In the event there is a problem related to windblown dust, water will be used to control windblown dust. Within the facility, a standard garden hose connected to an on-site water source may be sufficient to apply water.

The tracking of mud onto public roadways from the processing facility is not anticipated due to the access roads and on-site road being paved. All-weather surfaces will be maintained to prevent/minimize the tracking of dust and mud onto public access roads.

All on-site and other access roadways will be maintained on a regular basis to minimize depressions, ruts, and potholes, as appropriate. Off-site access roads and their repairs are under the jurisdiction of Atascosa County and TXDOT.

Perimeter Access 326.75(g)(3)

Access to the registration boundary will be controlled by a perimeter fence with lockable gates. The perimeter fence will consist of a four-foot barbed wire fence or a six-foot chain-link fence or equivalent. Waste storage will be located within the perimeter fencing and/or processing building but will not be located within the buffer zone or any easements or right-of-way crossing the facility.

30 TAC §326.75(h), Unloading of Waste

Unloading of Waste 326.75(h)

The unloading of waste will be confined to as small an area as practical. A trained employee will monitor all incoming loads of waste to help prevent the receipt of prohibited waste and to direct the unloading of waste. If needed, additional trained staff will be available to direct and observe the unloading of waste. All authorized waste will be unloaded within the

processing area or dock area (See Facility Layout Plan). Appropriate signs will be used to indicate where vehicles are to unload. The use of forced access lanes or other means will be used in conjunction with signs for the prevention of indiscriminate dumping. The owner or operator is not required to accept any waste which they determine will cause or may cause problems in maintaining full and continuous compliance with all regulations.

The unloading of waste in unauthorized areas is prohibited. The facility will ensure that any waste deposited in an unauthorized area will be promptly removed and disposed of properly. Vehicles will only be allowed to unload material within the processing area and dock area or transfer the material to another transport vehicle/trailer. The facility will maintain records of material that is removed from the site.

The unloading of prohibited wastes will not be allowed. Only those waste streams specified in this registration application will be unloaded. Trained employees shall observe each load and require unauthorized material to be removed by the transporter, and/or have the unauthorized material removed by on-site personnel or otherwise properly managed by the facility. Trained employees may also assess appropriate surcharges for the detection and/or management of unauthorized material. Any prohibited waste discovered prior to unloading will be rejected and returned promptly to the transporter or generator of the waste.

In the event unauthorized materials are unloaded at the site, the material will be rejected and the transporter will be required to immediately remove the waste along with any contaminated materials from the facility. Any undisclosed prohibited waste discovered after unloading will be isolated until the material can be adequately identified. All equipment operators, clerks, and the facility manager have the authority and responsibility to reject loads and require the transporter to immediately remove rejected waste streams and contaminated materials from the site. The facility will maintain records in the site operating records of unauthorized material rejected or removed from the facility.

30 TAC §326.75(i)(3), Recording of Applicable Alternative Hours (if used)

The facility is authorized for 24/7 operation and alternate hours is not necessary.

30 TAC §326.75(j), Signs at Facility Entrances

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

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

Additional information may be added to the sign per the discretion of facility management. Additional signs, regarding such site rules as speed limits and exclusion of regulated hazardous and unacceptable waste streams, may also be posted. The posting of erroneous or misleading information shall constitute a violation of 30 TAC Chapter 326.

30 TAC §326.75(k), Control of Windblown Material and Litter

Windblown litter is not anticipated at the waste processing facility. Medical waste, or other approved waste, transported to the site must be packaged/containerized according to state/federal requirements. Medical waste, or other approved waste, will be unloaded within the building or loading/unloading dock area. In the event of heavy winds, the overhead doors of the building may be closed to minimize the potential for windblown waste and/or litter.

When windblown litter is found, it will be picked up at least once per day on the days the facility is in operation to minimize unhealthy, unsafe, or unsightly conditions. Additional fencing or screening will not be required due to the nature of the incoming waste.

A portable fence, perimeter fencing, or other suitable practice may be employed to confine windblown material resulting from operations, as needed.

Waste falling from vehicles is not anticipated due to the strict packaging requirements for Special Waste From Health Care Related Facilities (SWFHCRF). In the event SWFHCRF falls from a vehicle, the waste will be picked up immediately and re-packaged in accordance with applicable state/federal rules.

The owner or operator will take steps to ensure vehicles hauling waste to the facility are enclosed and properly secured in order to prevent the escape of waste. The transportation of medical wastes is regulated by the U.S. Department of Transportation as well as the TCEQ. In accordance with 30 TAC 330.1201, TCEQ requires all registered transporters to transport untreated waste in a manner that would not cause harm to human health and the environment.

30 TAC §326.75(I), Facility Access Roads

Paved or gravel surfaces are provided within the facility for wet weather operations. All-weather surfaces will be maintained to prevent the tracking of mud and debris onto public roadways. All weather roads including the main entrance road and main access road will be designated for wet weather operation. The tracking of mud and trash onto public roadways from the facility is not anticipated due to the location of the facility.

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

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

30 TAC §326.75(m), Noise Pollution and Visual Screening

The transfer and/or unloading of waste will occur inside the building loading area. Steps will be taken to minimize the amount of noise pollution generated from the site. While the majority of activity will take place within the covered loading dock, steps to reduce noise pollution outside of the building may include, but are not limited, to turning waste transport vehicles off during loading/unloading.

30 TAC §326.75(n), Overloading and Breakdown

The design capacity of the facility, 50 tons of waste in a 24 hour period, will never be exceeded during operation. If the facility receives waste quantities that cannot be processed within a time frame to prevent the creation of odors, insect breeding or vector harboring, additional waste will not be received until the problem conditions are abated. Alternately, incoming waste may be transported to another registered Processing Facility.

If a significant work stoppage should occur at the facility due to mechanical breakdown or other causes, additional processing units may be brought in to treat waste. Any additional units brought in to treat waste will be the same as existing processing units. In the event the facility cannot bring in an additional processing unit, the facility will restrict the receiving of waste accordingly. Under such circumstances, incoming waste will be diverted or transported to an approved processing facility.

If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harborage of vectors, the accumulated solid waste will be transferred to a refrigeration unit or removed from the site and taken to an approved processing facility. Cleaning and maintenance will be performed as recommended by the manufacturer and as necessary so the equipment efficiency can be adequately maintained. Additional transport vehicles or refrigeration units will be brought in as needed. Additional transport units will meet the requirements of 30 TAC Chapter 326 relating to Transporters of Untreated Medical Waste.

30 TAC §326.75(o), Sanitation

All working surfaces that come in contact with wastes shall be washed down on a weekly basis at the completion of processing. The facility will be swept daily and washed down at least two times per week when the facility is operating on a continuous basis.

In the event of a spill, the waste will be collected and packaged in accordance with 30 TAC 326.19, United States Department of Transportation 49 CFR 178, and Occupational Safety and Health Administration 29 CFR 1910.

Working surfaces contacted by untreated medical waste will be sanitized with a commercial grade disinfectant. The mixture will be absorbed with paper towels, cloth or equivalent material and managed as untreated medical waste.

Wash waters will not be allowed to accumulate onsite to prevent the creation of odors or an attraction of vectors. All wash waters shall be collected and disposed of in an authorized manner.

Potable water and sanitary facilities are provided for all employees and visitors. The sewer system is provided by and maintained by the City of Pleasanton.

30 TAC §326.75(p), Ventilation and Air Pollution Control

This facility is subject to TCEQ jurisdiction concerning air pollution control. Air emissions from this facility will not cause or contribute to a condition of air pollution as defined in the Texas Clean Air Act.

The facility and constructed air pollution abatement devices will obtain authorization, as applicable, from the Air Permits Division.

Untreated medical waste will be received in closed containers. In the event untreated medical waste will be held longer than 72 hours after receipt, the waste will be refrigerated to control odors.

The facility will be designed and operated to provide adequate ventilation for odor control and employee safety. The facility does not anticipate an odor issue due to the short holding time of medical waste. In the event an odor problem does arise, the overhead doors may be closed, as necessary, to prevent nuisance odors from passing beyond the facility boundary. The control of odors may also be accomplished through commercially available odor masking sprays or through the refrigeration of untreated waste. If utilized at the facility, all air pollution emission capture and abatement equipment will be properly maintained and operated. Cleaning and maintenance of the abatement equipment will be performed as recommended by the manufacturer and as necessary so the equipment efficiency can be adequately maintained.

Cleaning and maintenance of mobile waste processing units, if utilized, will be performed each day the unit is in operation to ensure the unit is in working condition to reduce odors.

The reporting of emissions events will be made in accordance with 30 TAC 101.201 relating to Emissions Event Reporting and Recordkeeping Requirements. The reporting of scheduled maintenance will be made in accordance with 30 TAC 101.211 relating to scheduled maintenance, startup, and shutdown reporting and recordkeeping requirements.

Any ponded water at the facility will be controlled to avoid it from becoming a nuisance. In the event objectionable odors do occur, appropriate measures shall be taken to alleviate the condition.

30 TAC §326.75(q), Health and Safety

I. Introduction

This plan has been prepared to provide guidance for a safe work environment and a guideline in the event an emergency situation arises during the normal course of work for Terrabella Environmental Services Inc employees while working at the Pleasanton facility. All employees will be instructed in safe operating procedures and emergency preparedness.

II. Training

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

- a. Fire extinguishers,
- b. Telephones,
- c. Emergency telephone numbers, and
- d. Locations of safety equipment.

III. Safety and Awareness Meetings

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

IV. Basic Personal Protective Equipment

Personnel protective equipment may include the following:

- a. Safety glasses,
- b. Face mask,
- c. Gloves (latex and kevlar),
- d. Coveralls, and
- e. Non-skid footwear.

V. Basic Elements

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

- a. Shift Supervisor
 - i. Watch for trucks entering the facility.
 - ii. Wear protective equipment while working with waste.
 - iii. Inspect loads as outlined in the Site Operating Plan.
 - iv. Lock facility gates after closing hours.
 - v. Manage receiving floor.
 - vi. Use common sense.
- b. Facility Supervisor / Facility Manager
 - i. Watch for trucks unloading.
 - ii. Wear protective equipment while working with waste.
 - iii. Be cautious around operating equipment.
 - iv. Lock facility gates after closing hours.
 - v. Use common sense.
 - vi. Check fire extinguishers at least annually to ensure proper working order.

VI. Emergency Procedures

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

- Fire 911
- Police 911
- Ambulance 911

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

- An employee detecting an emergency should notify 911 and then the Terrabella Environmental Services Inc emergency coordinator, or designee. Until the emergency coordinator or designee arrives, the employee should direct site personnel and visitors to evacuate if there is imminent risk to their personal safety.
- The employee may administer emergency first aid, if qualified, if someone has been injured. If the injury is moderate, arrangements to transport the injured person to the nearest hospital will be made. If the injury is severe,

- emergency personnel at 911 will be contacted. Emergency care will be administered until the ambulance arrives.
- In the event of a fire or explosion, the employee detecting the fire or explosion will notify 911 and the Terrabella Environmental Services Inc emergency coordinator, or designee, describing the location and extent of the fire or explosion and any need for immediate assistance for first aid or fire containment. The employee must be prepared to assist the emergency coordinator and/or response team.

30 TAC 326.75(r), Disposal of Treated Medical Waste

Medical wastes that have been treated in accordance with the provisions of 25 TAC 1.136 may be managed as routine municipal solid waste unless otherwise specified in the rules.

Below are the requirements for the disposal of specific types of medical waste. These specific waste streams are typically found in waste from healthcare related facilities. This facility may only accept those waste streams that are approved in the registration.

- Treated microbiological waste, blood, blood products, body fluids, laboratory specimens of blood and tissue, and animal bedding may be disposed of in a permitted landfill. Any markings that identify the waste as a medical waste shall be covered with a label that identifies the waste as treated medical waste. The identification of the waste as treated may be accomplished by the use of color coded, disposable containers for the treated waste or by a label that states that the contents of the disposable container have been treated in accordance with the provisions of 25 TAC § 1.136.
- Treated carcasses and body parts of animals designated as a medical waste may, after treatment, be disposed of in a permitted landfill in Texas Commission on Environmental Quality Page 26 Chapter 326 - Medical Waste Management accordance with Chapter 330 of this title. The collection and transportation of these wastes shall conform to the applicable local ordinance or rule, if such ordinance or rule is more stringent than this subsection.
- Treated recognizable human body parts, tissues, fetuses, organs, and the products
 of human abortions, spontaneous or induced, shall not be disposed of in a municipal
 solid waste landfill. These items shall be disposed of in accordance with the
 provisions of 25 TAC 136(a)(4).
- Sharps treated and containerized with one of the approved methods as described under 25 TAC §1.136(a)(5) shall be disposed of in a permitted landfill in accordance with Chapter 330 of this title. Unused sharps shall be disposed of as treated sharps.

30 TAC §326.71(n), Financial Assurance

A copy of the documentation required to demonstrate financial assurance as specified in Chapter 37, Subchapter R of this title (relating to Financial Assurance for Municipal Solid Waste Facilities) shall be submitted 60 days prior to the initial receipt of waste. Continuous financial assurance coverage for closure must be provided until all requirements of the final closure plan have been completed and the facility is determined to be closed in writing by the executive director.

30 TAC §326.71(I)(1), Public Notice

No later than 90 days prior to the initiation of final facility closure, Terrabella Environmental Services Inc, through a public notice in the newspaper(s) of largest circulation in the vicinity of the facility, will provide public notice for final facility closure. This notice will provide the name, address, and physical location of the facility, the registration number, and the last date of intended receipt of waste. Terrabella Environmental Services Inc will also make available an adequate number of copies of the approved final closure plans for public access and review.

Terrabella Environmental Services Inc will also provide written notification to the executive director of the intent to close the facility and place the notice of intent in the site operating record.

30 TAC §326.71(I)(2), Signage

Terrabella Environmental Services Inc shall post a minimum of one sign at the main entrance and all other frequently used points of access for the facility notifying all persons who may utilize the facility of the date of closing for the entire facility and the prohibition against further receipt of waste materials after the stated date. Further, suitable barriers shall be installed at all gates or access points to adequately prevent the unauthorized dumping of solid waste at the closed facility.

30 TAC §326.71(I)(3), Required submittals to executive director

Within ten days after completion of final closure activities of the facility, the owner and operator shall submit to the executive director by registered mail:

- A certification, signed by an independent licensed professional engineer, verifying that final facility closure has been completed in accordance with the approved closure plan. The submittal to the executive director shall include all applicable documentation necessary for certification of final facility closure; and
- A request for voluntary revocation of the facility registration.

Section 6—Applicant Certification and Signature

The applicant is the person or entity who would be the owner of the facility and in whose name the registration would be issued. If the application is signed by an authorized representative for the applicant, the applicant must complete the delegation of signature authority.

Certification by Applicant or Authorized Signatory [30 TAC §305.44]

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

Name of applicant, or other person authorized to sign: Michael D. Carr
Title of person signing: President
Signature: MACO
Notarization
SUBSCRIBED AND SWORN to before me by the said Michael D Carry CAR
On this 25 day of March , 2020.
My commission expires on the day of November, 2023.
Enly Carcing
Notary Public in and for
Atasaa County, Texas
Applicant's Delegation of Signature Authority [30 TAC §305.43]
before the Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application. Name of applicant's representative:N/A
Name of person who is the applicant, on officer or official representing corporation or public agency
Signature: Date: 25MA2
Notarization
SUBSCRIBED AND SWORN to before me by the said Michael D Carr
On this 25 day of March , 200.
My commission expires on the day of November, 2022. Notary Public in and for
A SOSCI County, Texas
TCEQ-20789, Application for a Medical Waste Registration (09-28-18)

Section 7—Property Owner Affidavit

Affidavit [30 TAC §326.71(b)]

This section must be completed by the owner of the property on which the facility would be located.

I am the owner of the land on which the proposed facility would be located. I acknowledge that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure of the facility. I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and after closure for the purpose of inspection and maintenance.

closure for the purpose of inspection and maintenance.
Property owner name: Agronf. Campal Techablla Environment
Signature: Date: 3/25/20
Notarization
SUBSCRIBED AND SWORN to before me by the said Aaron T (ampbell
On this 25 day of Maurch , 200
My commission expires on the day of November 2022
Notary Dublish and for
Notary Public in and for
County, Texas

Attachments

Table Att-1. Required Attachments

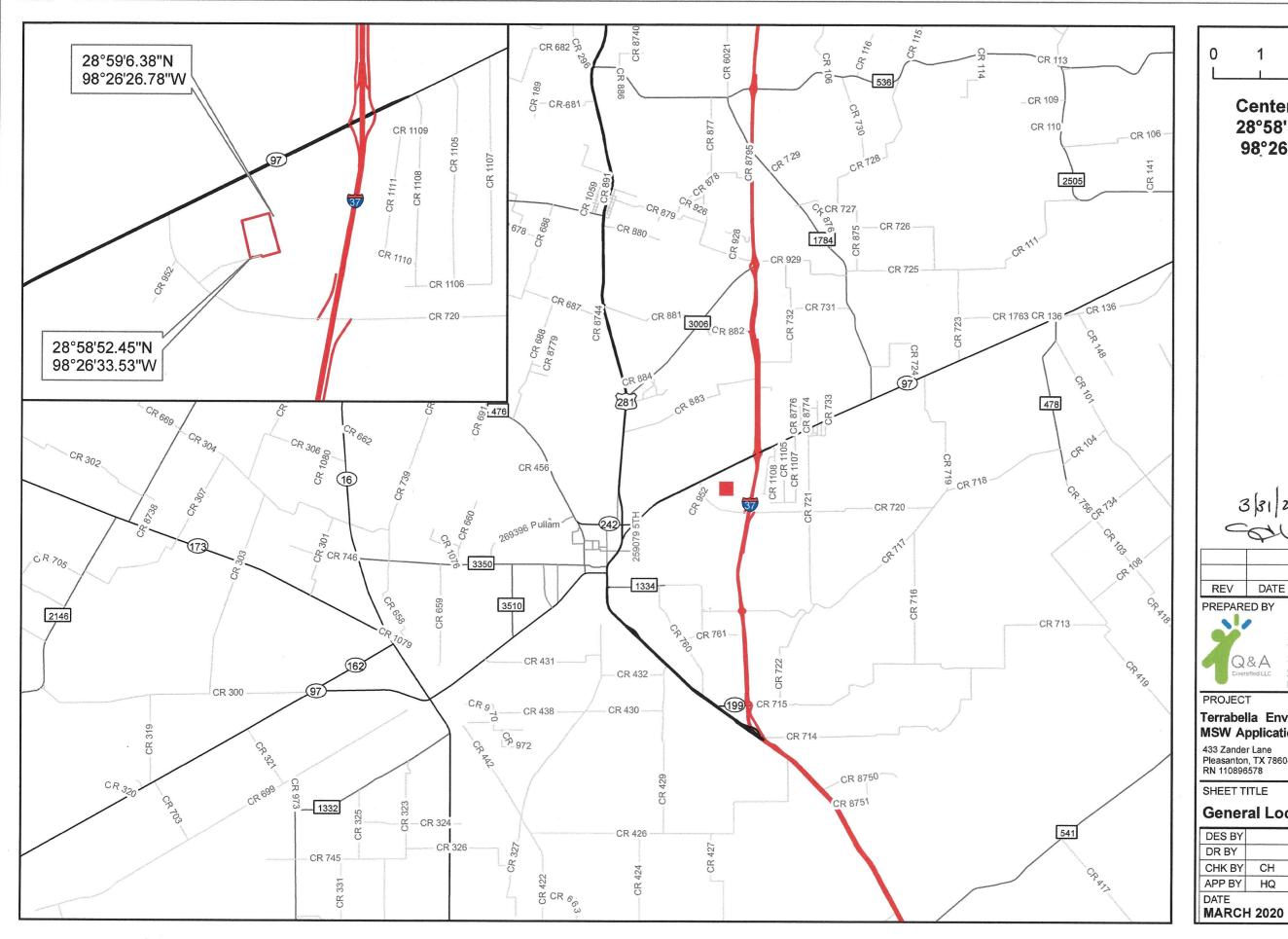
Attachments	Attachment No.
General Location Map	1
Facility Access Map	2
Facility Layout Map	2
Land Use Map	3
Land Ownership Map	4
Land Ownership List	5
Land Ownership Hard Copy and Electronic Mailing List or Mailing Labels	6
Metes and Bounds Drawing and Description	7
Copy of Authorization to Discharge Wastewater to a Treatment Facility	8
Process Flow Diagrams and Narrative	9
Procedures for Operation and Testing of Treatment Equipment, if applicable	10
Procedures for Preparation of any Chemical used in Treatment, if applicable	11-NA
Verification of Legal Status	12
Texas Department of Transportation Coordination Letters	13
Entity Exercising Maintenance Responsibility of Public Roadway, if applicable	14-NA
FEMA Map	15
□Facility Design Demonstration for Flood Management, or □ Conditional Letter of Map Amendment from FEMA, if applicable	16

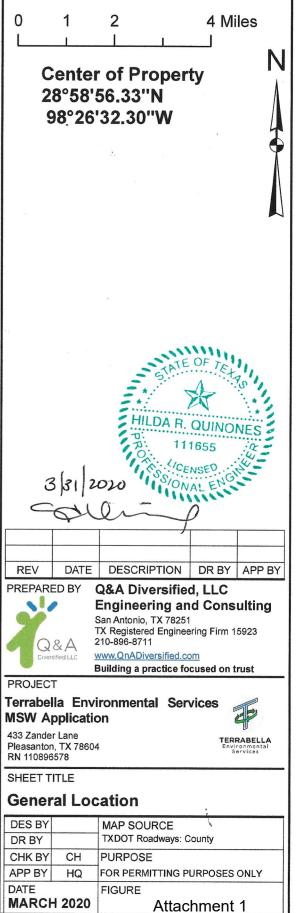
Wetland Documentation, if applicable	17-NA
Council of Governments Review Request Coordination Letters	18

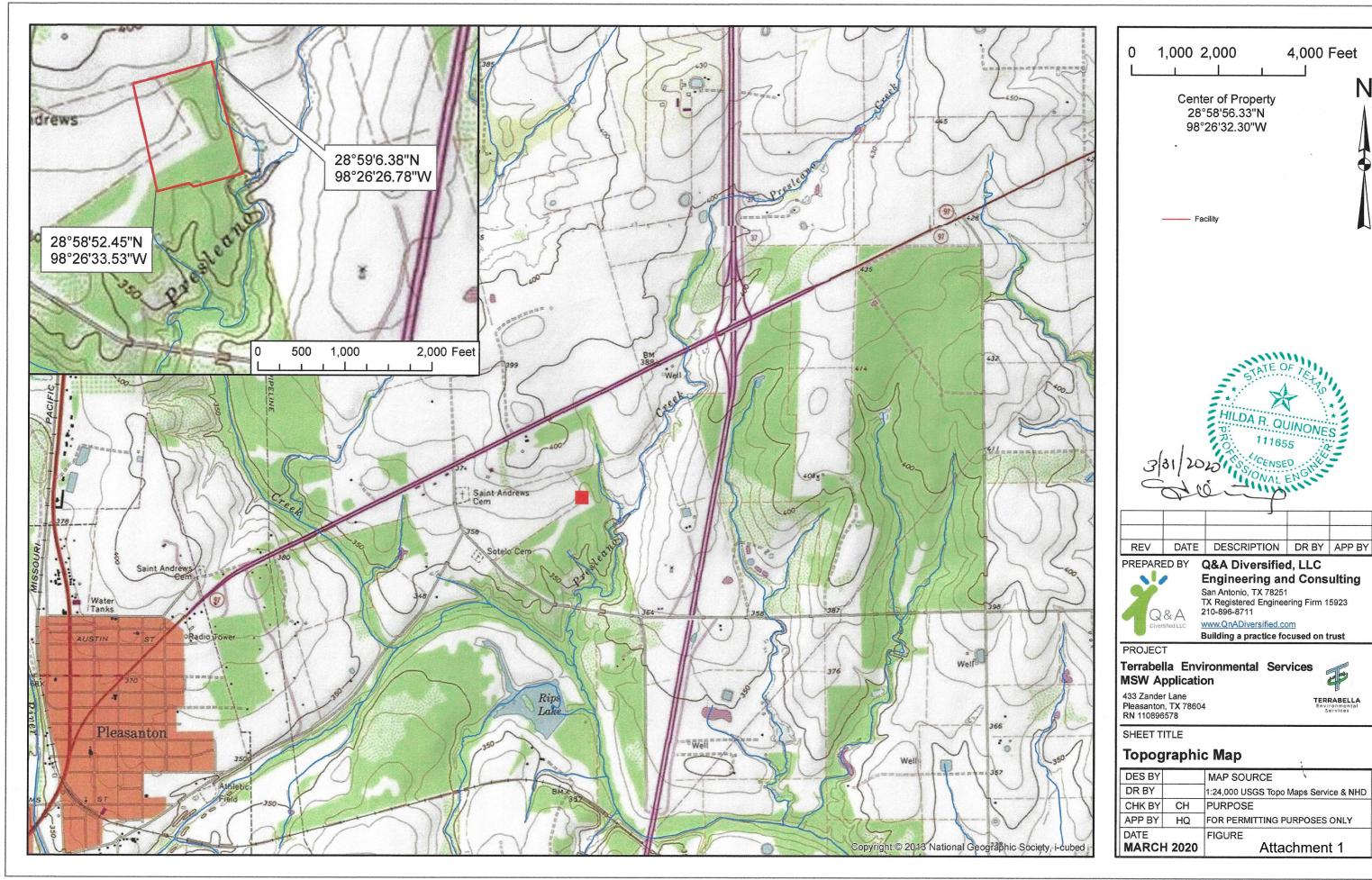
Table Att-2. Additional Attachments; check all that apply.

Attachments	Attachment No.
☑ TCEQ Core Data Form(s)	19
☑ Fee Receipt or copy of check	20
□ Published Zoning Map	21-NA
□ Delegation of Signatory Authority	22-NA
☑ Manufacturer Specifications for Waste Management Units	23
☐ Additional Storage and Processing Unit Closure Cost Items	24-NA
□ Confidential Documents	25-NA

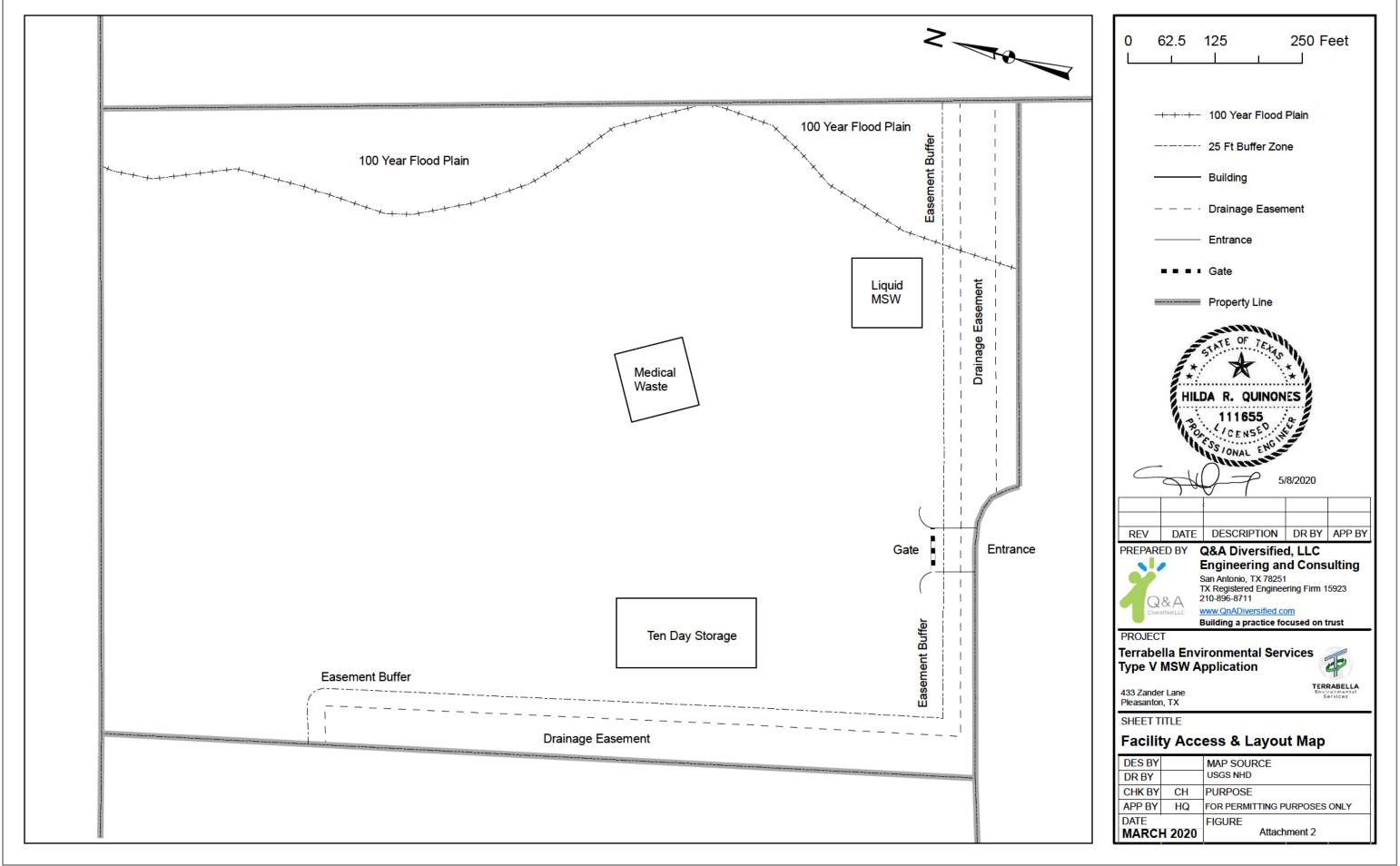
GENERAL LOCATION MAP

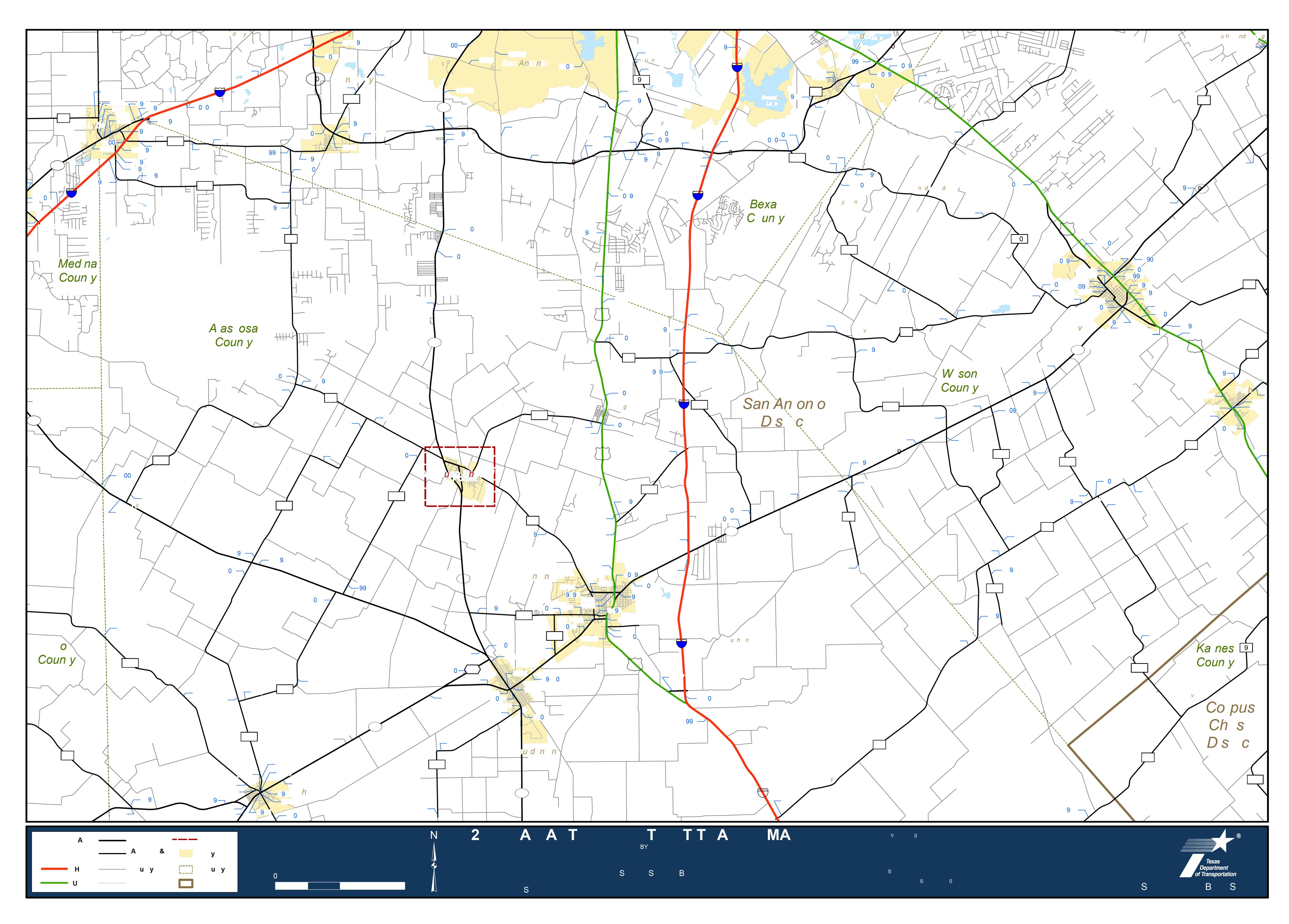




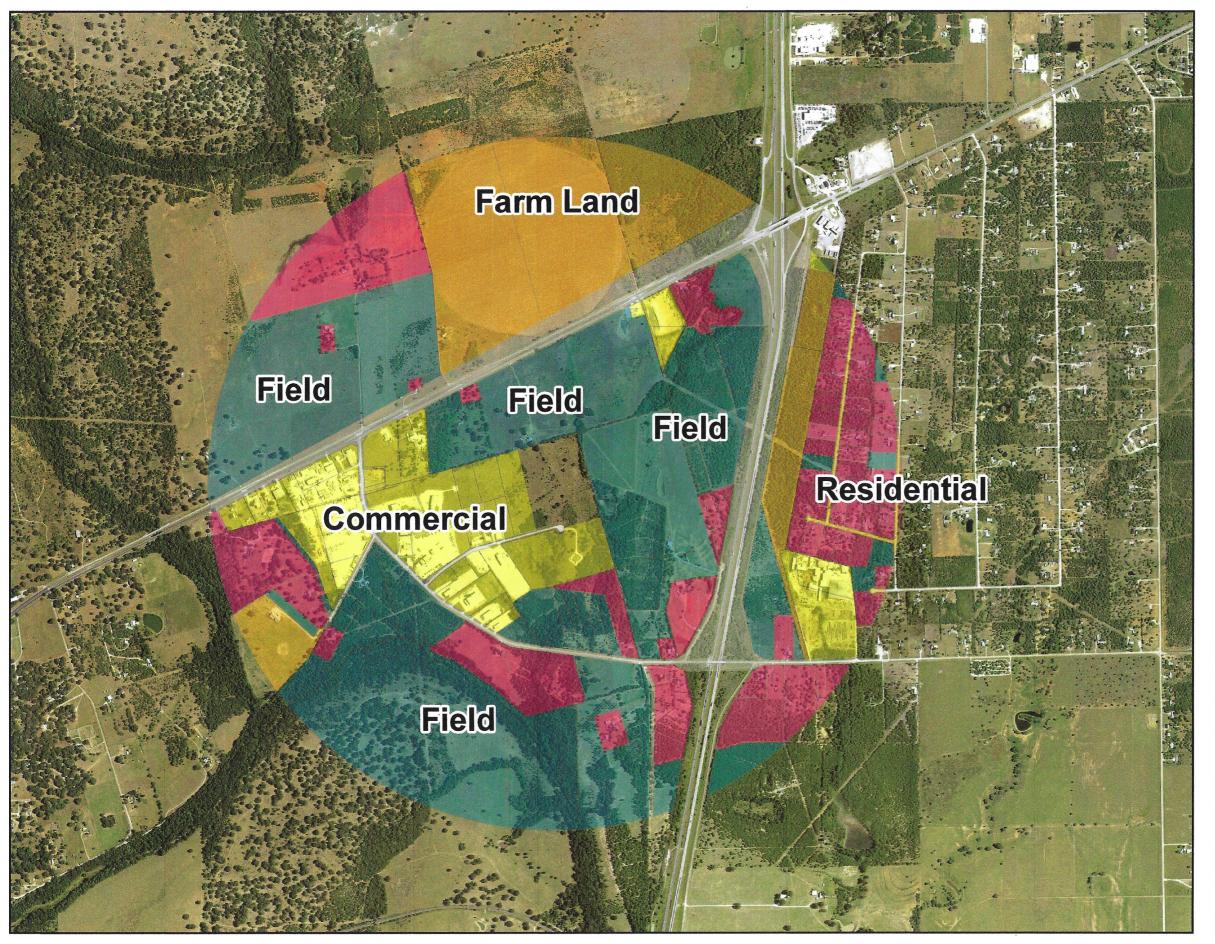


FACILITY ACCESS MAP FACILITY LAYOUT MAP





LAND USE MAP





LAND OWNERSHIP MAP



LAND OWNERSHIP LIST

Land Ownership List

Landowners Cross-Referenced to Landowners Map

The persons identified below would be considered as affected persons.

Property ID	Owner Name	Address 1	City	State	Zip
16053	ATASCOSA COUNTY	1 COURTHOUSE CIRCLE DR STE 101	JOURDANTON	TX	78026
16055	DICARO GREG	PO BOX 367	PLEASANTON	TX	78064
16298	STANUSH 4 FARMS, LP	4123 DESERT VIEW	SAN ANTONIO	TX	78217
16299	STANUSH 4 FARMS, LP	4123 DESERT VIEW	SAN ANTONIO	TX	78217
18004	FIGUEROA PEDRO JR & ROSA	345 SCOGIN LN	PLEASANTON	TX	78064
18006	FIGUEROA PEDRO JR & ROSA	345 SCOGIN LN	PLEASANTON	TX	78064
79224	MOSS GERALD R & JUDY Y	25274 CAMINO DE TIERRA	DESCANSO	CA	91916
79226	ENTERPRISE CRUDE OIL LLC ATTN: ADVALOREM TAX	PO BOX 4018	HOUSTON	TX	77210
79377	SOUTHCOAST HOLDINGS LLC	PO BOX 80673	LAFAYETTE	LA	70598
163513	JOHNSON PERMIAN INTERESTS LTD	PO BOX 7946	HOUSTON	TX	77270
176629	GULF COAST COMPANIES INC	PO BOX 1810	ABBEVILLE	LA	70511
176630	GULF COAST COMPANIES INC	PO BOX 1810	ABBEVILLE	LA	70511
176749	WYTEX PROPERTIES LLC	25528 GENESEE TRAIL RD	GOLDEN	СО	80401
176750	HOLLISTER JANET & HOLLISTER LORI	14 DRAKES COVE RD	LARKSPUR	CA	94939
176751	LUCKY'S INVESTMENTS LLC	24005 OAK BENO DR	LUTHER	OK	73020
176752	WYTEX PROPERTIES LLC	25528 GENESEE TRAIL RD	GOLDEN	СО	80401
176754	BX3 PROPERTIES LLC	PO BOX 162145	FT WORTH	TX	76161
181988	REGANN RESOURCES LLC	P. O. BOX W	BASTROP	TX	78602
182005	CERNY REAL ESTATE LLC REESE INTERESTS LLC	2825 WILCREST SUITE 300	HOUSTON	TX	77042
182185	REESE INTERESTS LLC	2825 WILCREST SUITE 300	HOUSTON	TX	77042
189087	CALZADA JOSEFINA	1155 CORGEY RD	PLEASANTON	TX	78064
189881	IZAGUIRRE OCTAVIO & ANAMARIA B	2220 TERRELL AVE	JOURDANTON	TX	78026
189882	TORRES AUGUSTIN BRAVO	5023 ARIZONA BAY	SAN ANTONIO	TX	78244
189883	ORTEGA JOSE TOBIAS LARA UNDEL	826 WINSHIP RD	PLEASANTON	TX	78064
189884	LOPEZ JUAN RAMON CENTENO	419 BRADLEY ST	SAN ANTONIO	TX	78211
189885	SANTIAGO CATARINO CERVANTES	25390 WHISPERING WIND DR	SAN ANTONIO	TX	78264
197478	HUNTING TITAN INC	PO BOX 2316	PAMPA	TX	79066
200569	ACCEL LOGISTICS INC	134 FM 2738	ALVARADO	TX	76009

Mineral Interest Ownership Under The Facility

Based on a tax appraisal record search (Tax Year: 2019 Property ID 16055), no separate mineral interest ownership is apparent at this property.

Facility Easement Holders

Owner Name	Address 1	City	State	Zip
ATASCOSA COUNTY	1 COURTHOUSE CIRCLE DR STE 101	JOURDANTON	TX	78026

LAND OWNERSHIP HARD COPY AND ELECTRONIC MAILING LIST OR MAILING LABELS

RN110896578 Medical Processing Facility Initial Application Submittal Date (03/31/2020) STANUSH 4 FARMS LP ATASCOSA COUNTY FIGUEROA PEDRO JR ROSA 345 SCOGIN LN **4123 DESERT VIEW** 1 COURTHOUSE CIRCLE DR STE 101 SAN ANTONIO TX 78217 **JOURDANTON TX 78026** PLEASANTON TX 78064 MOSS GERALD R JUDY Y FIGUEROA PEDRO JR ROSA STANUSH 4 FARMS LP 345 SCOGIN LN 4123 DESERT VIEW 25274 CAMINO DE TIERRA PLEASANTON TX 78064 **SAN ANTONIO TX 78217 DESCANSO CA 91916** ENTERPRISE CRUDE OIL LLC SOUTHCOAST HOLDINGS LLC JOHNSON PERMIAN INTERESTS LTD ATTN ADVALOREM TAX PO BOX 80673 PO BOX 7946 PO BOX 4018 LAFAYETTE LA 70598 **HOUSTON TX 77270 HOUSTON TX 77210 GULF COAST COMPANIES INC GULF COAST COMPANIES INC** WYTEX PROPERTIES LLC PO BOX 1810 PO BOX 1810 25528 GENESEE TRAIL RD ABBEVILLE LA 70511 ABBEVILLE LA 70511 **GOLDEN CO 80401** WYTEX PROPERTIES LLC **BX3 PROPERTIES LLC** LUCKYS INVESTMENTS LLC 25528 GENESEE TRAIL RD 24005 OAK BENO DR PO BOX 162145 **GOLDEN CO 80401 FT WORTH TX 76161** LUTHER OK 73020 **CERNY REAL ESTATE LLC REGANN RESOURCES LLC HOLLISTER JANET HOLLISTER LORI** REESE INTERESTS LLC PO BOX W BASTROP TX 78602 14 DRAKES COVE RD 2825 WILCREST SUITE 300 LARKSPUR CA 94939 **HOUSTON TX 77042** REESE INTERESTS LLC CALZADA JOSEFINA IZAGUIRRE OCTAVIO ANAMARIA B 2825 WILCREST SUITE 300 1155 CORGEY RD 2220 TERRELL AVE **HOUSTON TX 77042** PLEASANTON TX 78064 **JOURDANTON TX 78026 TORRES AUGUSTIN BRAVO** ORTEGA JOSE TOBIAS LARA LOPEZ JUAN RAMON CENTENO **5023 ARIZONA BAY** UNDEL 419 BRADLEY ST SAN ANTONIO TX 78244 826 WINSHIP RD SAN ANTONIO TX 78211

PLEASANTON TX 78064

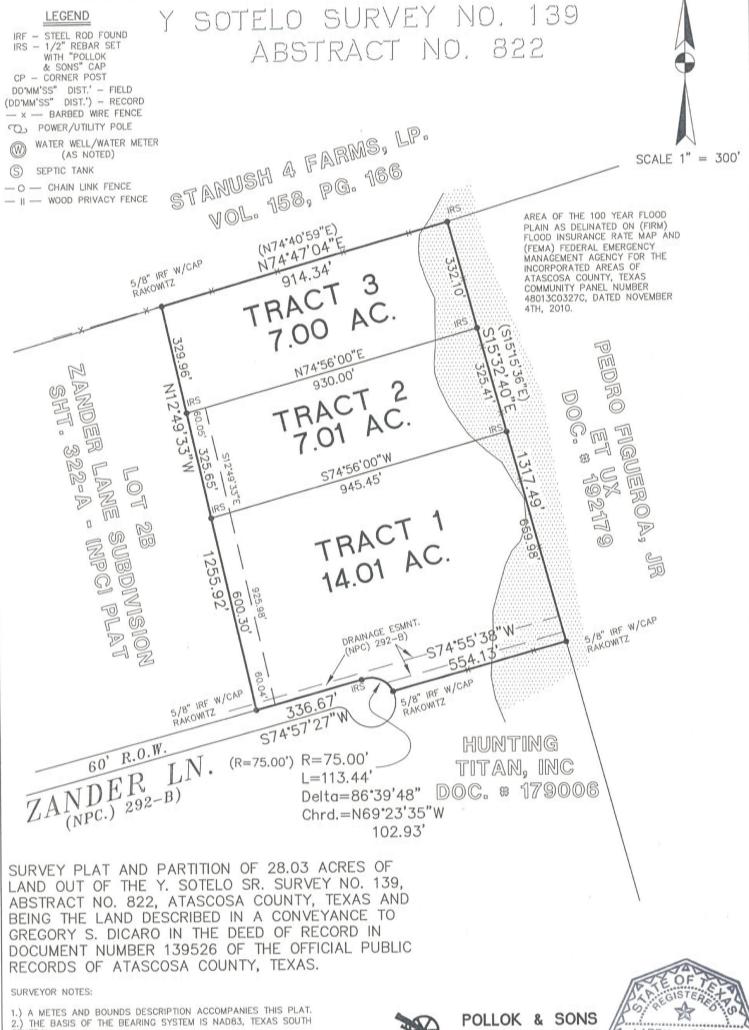
SANTIAGO CATARINO CERVANTES 25390 WHISPERING WIND DR SAN ANTONIO TX 78264

HUNTING TITAN INC PO BOX 2316 **PAMPA TX 79066**

ACCEL LOGISTICS INC 134 FM 2738 **ALVARADO TX 76009**

DICARO GREG **PO BOX 367** PLEASANTON TX 78064

METES AND BOUNDS DRAWING AND DESCRIPTION



- CENTRAL.

 3.) THIS PLAT WAS PREPARED FOR GRGORY DICARO. NO LICENSE HAS BEEN CREATED, EXPRESSED, OR IMPLIED TO COPY THIS SURVEY EXCEPT AS IS NECESSARY IN CONJUNCTION WITH THE ORIGINAL TRANSACTION.
- ORIGINAL TRANSACTION.

 4.) THIS SURVEY IS ONLY VALID WITH THE SURVEYOR'S ORIGINAL SIGNATURE IN GREEN INK. THE SURVEYOR ASSUMES NO LIABILITY FOR THIS SURVEY WITHOUT AN ORIGINAL SEAL AND SIGNATURE.

 5.) IT IS THE OWNERS/SELLERS/BUYERS RESPONSIBILITY TO ENSURE THAT ANY TRANSACTION UTILIZING THIS SURVEY IS IN COMPLIANCE WITH THE ATASCOSA COUNTY DEVELOPMENT STANDARDS.

REFERENCE:

DOC. # 135926 - DEED

DOC. # 141132 - WATER ESMNT.(BLNKT.)

DOC. # 142617 - ELEC. ESMNT. (BLNKT.) DOC. # 142618 - ELEC. ESMNT. (BLNKT.) DOC. # 142619 - ELEC. ESMNT. (BLNKT.) DOC. # 142894 - TEL. ESMNT. (BLNKT.)



SURVEYING, INC. 10052700 FIRM NO.

FLORESVILLE, TEXAS (830) 393-4770

STATE OF TEXAS COUNTY OF ATASCOSA

I HEREBY CERTIFY THAT THE ABOVE PLAT REPRESENTS AN ACTUAL SURVEY MADE ON THE GROUND BY PEOPLE WORKING UNDER MY DIRECT SUPERVISION

25TH SEPTEMBER , 20<u>19</u>_A.D.

S. POLLOK LARRY © 2019 ALL RIGHTS RESERVED R.P.L.S. NO.5186

JOB NO. 19-0320

Attachments Page 17 of 69

FIELD NOTES FOR 14.01 ACRES OF LAND TRACT 1

BEING 14.01 ACRES OF LAND OUT OF THE Y. SOTELO SR. SURVEY NO. 139, ABSTRACT NO. 822, ATASCOSA COUNTY, TEXAS AND BEING KNOWN AS TRACT 1 IN A SURVEY AND PARTITION OF THE LAND DESCRIBED IN A CONVEYANCE TO GREGORY S. DICARO IN THE DEED OF RECORD IN DOCUMENT NUMBER 139526 OF THE OFFICIAL PUBLIC RECORDS OF ATASCOSA COUNTY, TEXAS AND BEING MORE PARTICULARLY DESCRIBED BY METES AND BOUNDS AS FOLLOWS:

BEGINNING at a found 5/8" pin with a "Rakowitz" cap on the northerly right-of-way of Zander Lane for the southeasterly corner of Lot 2B, Zander Lane Subdivision as shown on the plat of record on Sheet 322-A, NPC, New Plat Cabinet of Atascosa County, Texas and the southwesterly corner of the Dicaro land and of this tract;

THENCE North 12° 49' 33" West, with the common line of said Lot 2B, a distance of 600.30 feet to a set ½" rebar with a "Pollok & Sons" cap for the southwesterly corner of a 7.01 acre tract known as TRACT 2 in this survey and partition and the northwesterly corner of this tract;

THENCE North 74° 56' 00" East, into and across the Dicaro land and with the common line of said TRACT 2, a distance of 945.45 feet to a set ½" rebar with a "Pollok & Sons" cap on the westerly line of the Pedro Figueroa, Jr., et ux land as described in Document 192179 of the Official Public Records of Atascosa County, Texas for the southeasterly corner of said TRACT 2 and the northeasterly corner of this tract;

THENCE South 15° 32' 40" East, with the common line of said Figueroa land, a distance of 659.98 feet to a found 5/8" pin with a "Rakowitz" cap for the northeasterly corner of the Hunting Titan, Inc. land as described in Document 179006 of the Official Public Records of Atascosa County, Texas and the southeasterly corner of the Dicaro land and of this tract;

THENCE South 74° 55' 38" West, with the common line of said Hunting Titan, Inc. land, a distance of 554.13 feet to a found 5/8" pin with a "Rakowitz" cap on the easterly end of a culde-sac of the aforementioned Zander Lane for a corner of said Hunting Titan, Inc. land and of this tract;

THENCE with said Zander Lane right-of-way as follows:

With a curve to the left having a radius of 75.00 feet, a length of curve of 113.44 feet, and a chord bearing of North 69° 23' 35" West, a distance of 102.93 feet to a set ½" rebar with a "Pollok & Sons" cap;

South 74° 57' 27" West, a distance of 336.67 feet to the **POINT OF BEGINNING** and containing 14.01 acres of land as shown on a plat that accompanies this description.

The bearing system is based on NAD83, Texas South Central.

POLLOK & SONS SURVEYING, INC

Firm No. 10052700

September 25, 2019

Refer. 19-0322

FIELD NOTES FOR 7.01 ACRES OF LAND TRACT 2

BEING 7.01 ACRES OF LAND OUT OF THE Y. SOTELO SR. SURVEY NO. 139, ABSTRACT NO. 822, ATASCOSA COUNTY, TEXAS AND BEING KNOWN AS TRACT 2 IN A SURVEY AND PARTITION OF THE LAND DESCRIBED IN A CONVEYANCE TO GREGORY S. DICARO IN THE DEED OF RECORD IN DOCUMENT NUMBER 139526 OF THE OFFICIAL PUBLIC RECORDS OF ATASCOSA COUNTY, TEXAS AND BEING MORE PARTICULARLY DESCRIBED BY METES AND BOUNDS AS FOLLOWS:

BEGINNING at a set ½" rebar with a "Pollok & Sons" cap on the easterly line of Lot 2B, Zander Lane Subdivision as shown on the plat of record on Sheet 322-A, NPC, New Plat Cabinet of Atascosa County, Texas for the northwesterly corner of a 14.01 acre tract known as TRACT 1 in this survey and partition and the southwesterly corner of this tract from which a found 5/8" pin with a "Rakowitz" cap on the northerly right-of-way of Zander Lane for the southeasterly corner of said Lot 2B and the southwesterly corner of the Dicaro land bears South 12° 49' 33" East, a distance of 600.30 feet;

THENCE North 12° 49' 33" West, with the common line of said Lot 2B, a distance of 325.65 feet to a set ½" rebar with a "Pollok & Sons" cap for the southwesterly corner of a 7.00 acre tract known as TRACT 3 in this survey and partition and the northwesterly corner of this tract;

THENCE North 74° 56' 00" East, into and across the Dicaro land and with the common line of said TRACT 3, a distance of 930.00 feet to a set ½" rebar with a "Pollok & Sons" cap on the westerly line of the Pedro Figueroa, Jr., et ux land as described in Document 192179 of the Official Public Records of Atascosa County, Texas for the southeasterly corner of said TRACT 3 and the northeasterly corner of this tract;

THENCE South 15° 32' 40" East, with the common line of said Figueroa land, a distance of 325.41 feet to a set ½" rebar with a "Pollok & Sons" cap for the northeasterly corner of the aforementioned TRACT 1 and the southeasterly corner of this tract;

THENCE South 74° 56' 00" West, into and across the Dicaro land and with the common line of said TRACT 1, a distance of 945.45 feet to the **POINT OF BEGINNING** and containing 7.01 acres of land as shown on a plat that accompanies this description.

The bearing system is based on NAD83, Texas South Central.

POLLOK & SONS SURVEYING, INC.

Firm No. 10052700

Larry J. Pollok, RPLS #5186

September 25, 2019

Refer. 19-0322

FIELD NOTES FOR A 60 FEET INGRESS/EGRESS EASEMENT

BEING A 60 FEET INGRESS/EGRESS EASEMENT OUT OF THE Y. SOTELO SR. SURVEY NO. 139, ABSTRACT NO. 822, ATASCOSA COUNTY, TEXAS AND BEING A PART OR PORTION OF THE LAND DESCRIBED IN A CONVEYANCE TO GREGORY S. DICARO IN THE DEED OF RECORD IN DOCUMENT NUMBER 139526 OF THE OFFICIAL PUBLIC RECORDS OF ATASCOSA COUNTY, TEXAS AND BEING MORE PARTICULARLY DESCRIBED BY METES AND BOUNDS AS FOLLOWS:

BEGINNING at a found 5/8" pin with a "Rakowitz" cap on the northerly right-of-way of Zander Lane for the southeasterly corner of Lot 2B, Zander Lane Subdivision as shown on the plat of record on Sheet 322-A, NPC, New Plat Cabinet of Atascosa County, Texas and the southwesterly corner of the Dicaro land, a 14.01 acre tract known as TRACT 1 in this survey and partition, and of this easement;

THENCE North 12° 49' 33" West, with the common line of said Lot 2B, a distance of 925.95 feet to a set ½" rebar with a "Pollok & Sons" cap for the southwesterly corner of a 7.00 acre tract known as TRACT 3 in this survey and partition and the northwesterly corner of a 7.01 acre tract known as TRACT 2 in this survey and partition and of this easement;

THENCE North 74° 56' 00" East, into the Dicaro land and with the common line of said TRACT 1 and TRACT 2, a distance of 60.05 feet to the northeasterly corner of this easement;

THENCE South 12° 49' 33" East, a distance of 925.98 feet to the aforementioned northerly right-of-way of Zander Lane for the southeasterly corner of this easement;

THENCE South 74° 57' 27" West, with said right-of-way, a distance of 60.04 feet to the **POINT OF BEGINNING** as shown on a plat that accompanies this description.

The bearing system is based on NAD83, Texas South Central.

POLLOK & SONS SURVEYING, INC.

Firm No. 10052700

September 25.2019

Refer: 19-0322

FIELD NOTES FOR 7.00 ACRES OF LAND TRACT 3

BEING 7.00 ACRES OF LAND OUT OF THE Y. SOTELO SR. SURVEY NO. 139, ABSTRACT NO. 822, ATASCOSA COUNTY, TEXAS AND BEING KNOWN AS TRACT 3 IN A SURVEY AND PARTITION OF THE LAND DESCRIBED IN A CONVEYANCE TO GREGORY S. DICARO IN THE DEED OF RECORD IN DOCUMENT NUMBER 139526 OF THE OFFICIAL PUBLIC RECORDS OF ATASCOSA COUNTY, TEXAS AND BEING MORE PARTICULARLY DESCRIBED BY METES AND BOUNDS AS FOLLOWS:

BEGINNING at a set ½" rebar with a "Pollok & Sons" cap on the easterly line of Lot 2B, Zander Lane Subdivision as shown on the plat of record on Sheet 322-A, NPC, New Plat Cabinet of Atascosa County, Texas for the northwesterly corner of a 7.01 acre tract known as TRACT 2 in this survey and partition and the southwesterly corner of this tract from which a found 5/8" pin with a "Rakowitz" cap on the northerly right-of-way of Zander Lane for the southeasterly corner of said Lot 2B and the southwesterly corner of the Dicaro land bears South 12° 49' 33" East, a distance of 925.95 feet;

THENCE North 12° 49' 33" West, with the common line of said Lot 2B, a distance of 329.96 feet to a found 5/8" pin with a "Rakowitz" cap on the southerly line of the Stanush 4 Farms, LP land as described in Volume 158, Page 166 of the Deed Records of Atascosa County, Texas for the northeasterly corner of said Lot 2B and the northwesterly corner of the Dicaro land and of this tract;

THENCE North 74° 47' 04" East, with the common line of said Stanush 4 Farms, LP land, a distance of 914.34 feet to a set ½" rebar with a "Pollok & Sons" cap for the northwesterly corner of the Pedro Figueroa, Jr., et ux land as described in Document 192179 of the Official Public Records of Atascosa County, Texas and the northeasterly corner of the Dicaro land and of this tract;

THENCE South 15° 32' 40" East, with the common line of said Figueroa land, a distance of 332.10 feet to a set ½" rebar with a "Pollok & Sons" cap for the northeasterly corner of the aforementioned TRACT 2 and the southeasterly corner of this tract;

THENCE South 74° 56' 00" West, into and across the Dicaro land and with the common line of said TRACT 2, a distance of 930.00 feet to the **POINT OF BEGINNING** and containing 7.00 acres of land as shown on a plat that accompanies this description.

The bearing system is based on NAD83, Texas South Central.

POLLOK & SONS SURVEYING, INC.

Firm No. 10052700

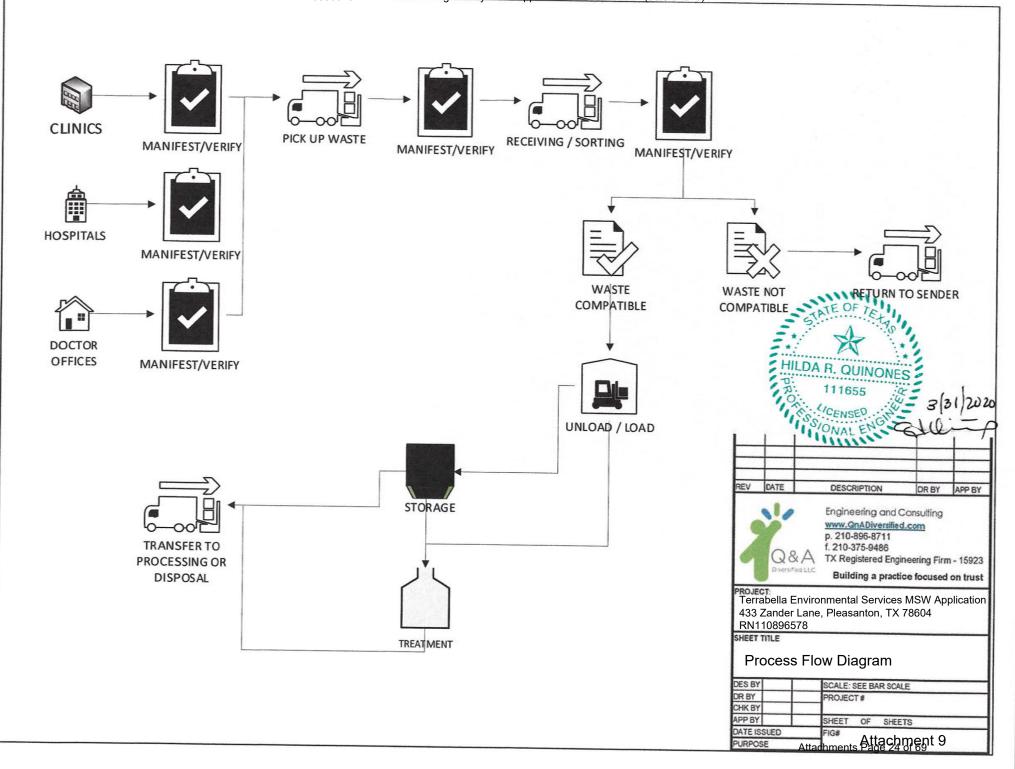
Larry J. Pollok, RPLS #5186

Refer. 19-0322

COPY OF AUTHORIZATION TO DISCHARGE WASTEWATER TO A TREATMENT FACILITY

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

PROCESS FLOW DIAGRAMS AND NARRATIVE



Attachment 9

Flow Diagram Narrative

Untreated medical waste is generated and identified at a health care facility. Sourceseparation may occur before the waste is containerized and labeled. Packaging requirements for regulated medical waste received by this facility include, but are not limited to, the following: 30 TAC 326.19, Department of Transportation - 49 CFR 178, and Occupational Safety and Health Administration - 29 CFR 1910. The containerized waste shall be collected by a registered transporter and transported to the commissionregistered medical waste facility for transfer, storage, and processing as defined in 326.3(40). Upon arrival at the registered facility, the manifest(s) and waste shall be reviewed and inspected by facility personnel before the transfer of waste. Once reviewed and inspected, the waste is accepted for treatment or rejected and returned to the generator as defined in 326.75(b). Accepted waste shall be unloaded in accordance with 326.75(h). The registered facility may store waste in temporary storage prior to processing. If waste is stored for more than 72 hours, waste will be refrigerated to a temperature of 45 degrees Fahrenheit or less. Waste shall be processed at the facility as defined in §326.3(40) by registered methods. Treated waste is periodically sampled for parameters as described in §326.41 (b)(4)(A). Finally, a registered transporter will collect the treated medical waste for transport to a commission-permitted landfill for disposal as defined in 326.41(c).

PROCEDURES FOR OPERATION AND TESTING OF TREATMENT EQUIPMENT

Attachment 10

Operation and Testing Procedures

The processing area at the facility will be located within a fully enclosed metal building with closeable bay doors. The building has reinforced concrete floors and concrete parking areas outside. The building was designed in accordance with all applicable local building code and land development code requirements. The facility will be surrounded a four-foot barbed wire fence or a six-foot chain-link fence or equivalent with lockable gates.

No disposal operations will take place at the facility; only waste transfer, storage and processing. Solid waste will be transported into the facility in private or commercial collection vehicles. The containerized waste will be unloaded and visually inspected to verify shipping document/manifest information as well as proper labeling and packaging per State and Federal regulations. Packaging requirements for regulated medical waste received by this facility include, but are not limited to, the following: Texas Commission on Environmental Quality - 30 TAC 330.1207, United States Department of Transportation - 49 CFR 178, and Occupational Safety and Health Administration - 29 CFR 1910. In the event unauthorized waste is discovered prior to unloading, the waste will be rejected and returned to the generator via the transporter. The unloading of containerized waste will be confined to the processing area of the building. Untreated medical waste will be managed in accordance with the provisions of 25 TAC Subchapter K and 30 TAC Subchapter Y.

In the event that reusable sharps containers are received at the facility, the reusable sharps containers will be diverted to a sharps consolidation area. The containerized sharps will be taken to the autoclave unit for processing and the reusable sharps containers will be washed and returned to generators. Terrabella Environmental Services Inc may use an automated sharps container washer at the facility.

In the event untreated medical waste needs to be refrigerated, the applicant's registered transport refrigeration vehicles will be utilized. The size and capacity of the company's fleet of refrigeration vehicles may change from time to time due to increase/decrease in fleet size. Currently, the fleet includes, but is not limited to, 24 foot to 50 foot box trailers

and trucks with capacities ranging from approximately 60 to 130 cubic yards. Terrabella Environmental Services Inc may also rent additional refrigeration units, if necessary.

The waste may be treated by steam sterilization or a Texas Department of Health approved alternate treatment technology. The two processes for the treatment of untreated medical waste that may be utilized at the facility are described below.

1. STEAM STERILIZATION

The steam sterilization system will consist of Bond-Tech autoclaves, or equivalent. Steam sterilization is a widely accepted waste processing system used in Texas for meeting regulations requiring medical waste to be treated and rendered non-infectious prior to the final disposal at an approved municipal solid waste landfill. The process consists of placing the untreated waste in a pressure vessel and forcing steam into the chamber and through the waste. When the waste is exposed to the proper temperatures as defined by the 25 Texas Administrative Codes for autoclave technology for the approved time, the waste will be rendered sterilized. The parameters of time, temperature and pressure of the steam sterilization system used at this facility will meet or exceed those required by the Department of State Health Services requirements for steam sterilization found in 25 TAC 1.133(b)(4)(8). Once the waste is sterilized, the treated waste will be stored on-site and then transported and disposed of at a TCEQ approved municipal solid waste landfill in accordance with 25 TAC 1.136 and 30 TAC 1219(b)-(e).

2. ALTERNATE TREATMENT TECHNOLOGY

Once the waste is received, the waste is transferred into a tub/cart and the net weight of the waste is electronically recorded. Once the waste has been placed on the lift and weighed, the operator engages the automated cart lift system and the lid covering the feed hopper is opened while the tub is raised and tilted to allow the waste to enter the feed hopper. As the hopper lid closes, the waste is drawn into the primary treatment chamber where the waste is treated using a Texas Department of Health approved chemical agent. The waste proceeds through the primary treatment chamber continually being shredded/macerated by the cutting

blades.

After passing through the primary treatment chamber, the waste moves to the secondary treatment chamber which is located directly below the primary treatment chamber where the final mixing and shredding/maceration will occur. The treated waste is forced from the secondary chamber into the waste exit chute. The waste passes a pH probe prior to being deposited in a waste container. A pH reading below 11 or above 12.5 will result in an automated shut-down of the system. In the event an automated shut-down occurs, the operator shall capture the waste in the waste exit chute and place it in red bags to be reprocessed until an acceptable pH range is achieved. Once treated, the shredded/macerated, dry waste is considered routine municipal solid waste and will be disposed of at a TCEQ approved municipal solid waste landfill.

PROCEDURES FOR PREPARATION OF ANY CHEMICAL USED IN TREATMENT

THIS SECTION IS NOT APPLICABLE

VERIFICATION OF LEGAL STATUS

Corporations Section P.O.Box 13697 Austin, Texas 78711-3697



Hope Andrade Secretary of State

Office of the Secretary of State

CERTIFICATE OF CONVERSION

The undersigned, as Secretary of State of Texas, hereby certifies that a filing instrument for

Terrabella Environmental Services LLC File Number: 801034159

Converting it to

TERRABELLA ENVIRONMENTAL SERVICES INC File Number: 801586147

has been received in this office and has been found to conform to law. ACCORDINGLY, the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law, hereby issues this certificate evidencing the acceptance and filing of the conversion on the date shown below.

Dated: 04/23/2012

Effective: 04/23/2012



Hope Andrade Secretary of State

og Aml

Phone: (512) 463-5555 Prepared by: Lynda Boots Fax: (512) 463-5709 TID: 10340 Dial: 7-1-1 for Relay Services

Document: 418475300002

Attachments Page 32 of 69

Page 2

2553 (Rev. 12-2007)	ormation (continued)		L			
J ne and address of each hareholder or former hareholder required to	Shareholders' Consent Statement. Under penalties of perjury, we declare that we delection of the above-named corporation to be an under section 1362(a) and that we have examine	Stock own percentage of (see instru	ownership actions)	M Social security number or employer	N Shareholder's tax year ends	
neent to the election. see the instructions for column K.)	and to the best of our knowledge and bellef, it is to complete. We understand our consent is binding withdrawn after the corporation has made a valid and date below.)	rue, correct, and	Number of shares or percentage of ownership	Date(s) acquired	identification number (see instructions)	(month and day)
	Signature					
ICHEAL D CARR	y philles		50%	04/23/12		12/31
ARON T AMPBELL	V Par Al Doll			04/23/12		12/31
LEASANTON	NULL CONTRACTOR	1	50%	-		
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TEXAS DEPARTMENT OF TRANSPORTATION COORDINATION LETTERS

March 31 2020

Mario R. Jorge
District Engineer - Project Review
Texas Department of Transportation (TxDOT)
4615 NW Loop 410
San Antonio, TX 78229-0928

Certified Mail: _______

Re:

Type V Registration Application Terrabella Environmental Services Inc. Pleasanton, Atascosa County, Texas

Dear Mr. Jorge: *

On behalf of our client, Terrabella Environmental Services Inc (TES), Q&A Diversified would like to take this opportunity to inform you of the pending submittal of the TES application to the Texas Commission on Environmental Quality (TCEQ) for a Type a medical waste transfer site. The medical waste transfer station will process, store and transfer medical waste, outdated/off specification pharmaceuticals and seized drugs. Sources of these waste streams include hospitals, clinics, nursing homes, and other health care related facilities. In addition to these waste streams, the facility may accept Animal and Plant Health Inspection Services (APHIS) and International Maritime Pollution Protocol (MarPol) wastes.

If the TxDOT has any comments or concurrence that the facility complies with the traffic and location restrictions for this road, please send them to me in writing. They will be included as a supplement to the application. If the project will be considered at a meeting of the TxDOT advisory committee, please advise as soon as you can so arrangements can be made to attend.

Thank you for your time and assistance. If you have any questions or need any additional information, please call me at 210-896-8711 or e-mail me at hildaq@qnadiversified.com.

Sincerely,

Hilda R. Quinones, P.E.

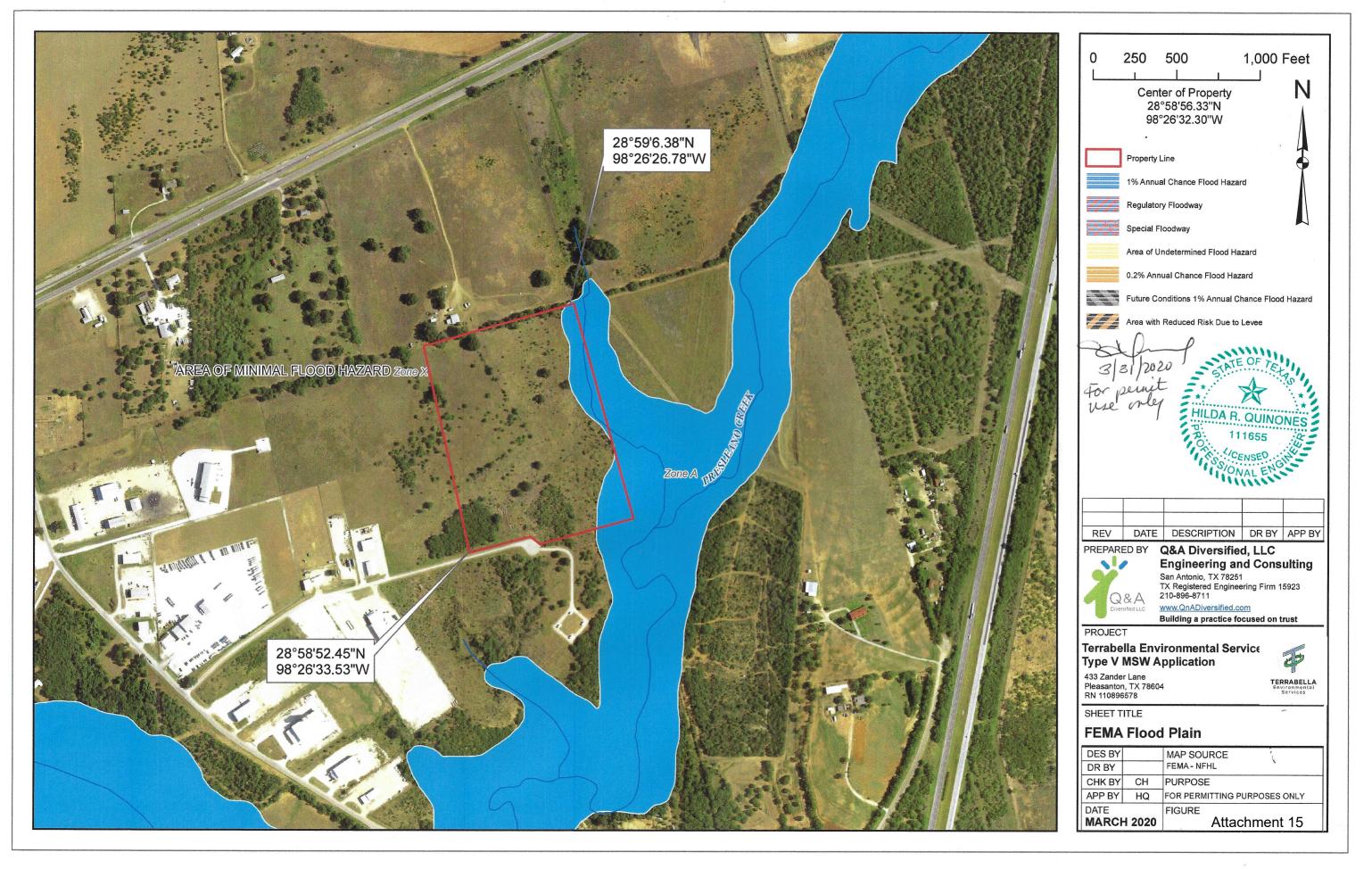
Enclosure



ENTITY EXERCISING MAINTENANCE RESPONSIBILITY OF PUBLIC ROADWAY

THIS SECTION IS NOT APPLICABLE

FEMA MAP

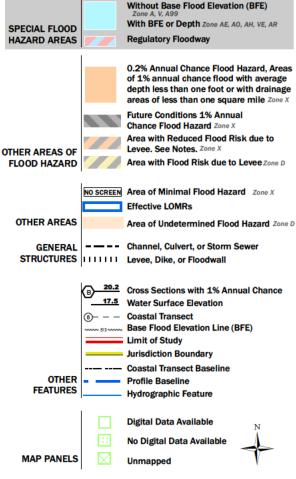


National Flood Hazard Payer Riverte Initial Application Submitted Date (03/31/2020)



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/16/2020 at 8:53:21 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

The pin displayed on the map is an approximate point selected by the user and does not represent

an authoritative property location.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

FACILITY DESIGN DEMONSTRATION FOR FLOOD MANAGEMENT, OR CONDITIONAL LETTER OF MAP AMENDMENT FROM FEMA

ATTACHMENT _____
FACILITY SURFACE WATER DRAINAGE REPORT
CERTIFICATION STATEMENT

I, Michael D Care Feralla Sinu, (owner and/or operator) certify the following:

- (1) The facility will be constructed, maintained, and operated to manage run-on and run-off during the peak discharge of a 25-year rainfall event and must prevent the off-site discharge of waste and feedstock material, including, but not limited to, in-process and/or processed materials.
- (2) Surface water drainage in and around a facility will be controlled to minimize surface water running onto, into, and off the treatment area.
- (3) The owner or operator will obtain the appropriate Texas Pollutant Discharge Elimination System storm water permit coverage when required; or shall provide the permit number for coverage under an individual wastewater permit.
- (4) The facility will be located outside of the 100-year floodplain unless the owner or operator can demonstrate that the facility is designed and will be operated in a manner to prevent washout of waste during a 100-year storm event, or the facility obtains a conditional letter of map amendment from the Federal Emergency Management Administration administrator.
- (5) The facility will not be located in wetlands unless the owner or operator provides documentation to the extent required under Clean Water Act, §404 or applicable state wetlands laws, that steps have been taken to attempt to achieve no net loss of wetlands.

Signature:

Date:

WETLAND DOCUMENTATION

THIS SECTION IS NOT APPLICABLE

COUNCIL OF GOVERNMENTS REVIEW REQUEST COORDINATION LETTERS

March 31, 2020

Christopher Moken Solid Waste Management Coordinator Project Review Alamo Area Council of Governments 8700 Tesoro Dr., Suite 160 San Antonio, TX 78217

Re:

Type V Registration Application

Terrabella Environmental Services Inc. Pleasanton, Atascosa County, Texas

Dear Mr. Moken:

On behalf of our client, Terrabella Environmental Services Inc (TES), Q&A Diversified would like to take this opportunity to inform you of the pending submittal of the TES application to the Texas Commission on Environmental Quality (TCEQ) for a Type a medical waste transfer site. The medical waste transfer station will process, store and transfer medical waste, outdated/off specification pharmaceuticals and seized drugs. Sources of these waste streams include hospitals, clinics, nursing homes, and other health care related facilities. In addition to these waste streams, the facility may accept Animal and Plant Health Inspection Services (APHIS) and International Maritime Pollution Protocol (MarPol) wastes.

The facility address is 433 Zander Lane, Pleasanton, Atascosa County, Texas 78064. Please refer to the enclosed General Location Map. The TCEQ registration application can be viewed online at http://www.qnadiversified.com/permits. The drawings located in the application will provide you with information regarding not only the facility location but also general land use.

If the AACOG has any comments or concurrence that the facility complies with the regional solid waste plan, please send them to me in writing. They will be included as a supplement to the application. If the project will be considered at a meeting of the AACOG solid waste advisory committee, please advise as soon as you can so arrangements can be made to attend.

Thank you for your time and assistance. If you have any questions or need any additional information, please call me at 210-896-8711 or e-mail me at hildaq@qnadiversified.com.

Sincerely,

Hilda R. Quinones, P.E.

Enclosure





Board of Directors

Robert L. Hurley, Chairman County Judge, Atascosa County Suzanne de Leon, Vice Chair Mayor, City Balcones Heights Luana Buckner

Board Chair, Edwards Aquifer Authority

Tommy Calvert

Commissioner, Bexar County James Danner

Mayor, City of Hondo Cris Euaster

Chief Operating Officer, CPS Energy

Richard A. Evans

County Judge, Bandera County Dr. Adriana Rocha Garcia Councilwoman, City of San Antonio

Robert W. Gregory

Mayor, City of La Vernia Tim Handren

Mayor, City of Boerne James C. Hasslocher

Board Member , University Health System

Wade Hedtke

County Judge, Karnes County

Richard L. Jackson

County Judge, Wilson County Rob Kelly

County iudae. Kerr County

Sherman Krause

County Judge, Comal County

Arnulfo Luna County Judge, Frio County

Darrel L. Lux

County Judge, Kendall County

Justin Meadows

Councilman, New Braunfels

Jose Menendez

Senator, State of Texas, District 26

Andrew Murr

State Representative, District 53

Clayton Perry

Councilman, City of San Antonio

Katie N. Reed

Trustee, Northside ISD Sergio "Chico" Rodriauez

Commissioner, Bexar County

Thomas A. Schoolcraft Mayor, City of Helotes

Chris Schuchart

County Judge, Medina County

Mark Stroeher

County Judge, Gillespie County James E. Teal

County Judge, McMullen County Roberto C. Trevino

Councilman, City of San Antonio

John Williams

Mayor, City of Universal City Kevin A. Wolff

Commissioner, Bexar County

Jim O. Wolverton Commissioner, Guadalupe County

Kyle Biedermann (Ex-Officio)

State Representative, District 73 Ryan Guillen (Ex-Officio)

State Representative, District 31

John Kuempel (Ex-Officio)

State Representative, District 44

COL. Peter Velesky (Ex-Officio)

Joint Base San Antonio

Judith Zaffirini (Ex-Officio)

State Senator, District 21

April 28, 2020

Office of the Chief Clerk, MC-105 TCEQ P.O. Box 13087 Austin, TX 78711

RE: Terrabella Environmental Services, Inc. MSW Facility Registration **Applications**

Dear Office of the Chief Clerk:

The Alamo Area Council of Governments (AACOG) received notice from Terrabella Environmental Services, Inc. that they are applying to TCEQ for 3 new facilities: Type V Medical Liquid Waste Facility, Medical Waste Transfer Station, and Medical Waste Processing Facility. The AACOG Resource Recovery Committee (RRC) held a meeting on April 15, 2020, where the RRC Checklist for the 3 new facilities proposed by Terrabella Environmental Services, Inc. in the AACOG region were reviewed. The RRC agreed the proposed facilities, to be located at 433 Zander Lane. Pleasanton, 78064 and 5376 FM 1784, Pleasanton, TX 78064 comply with the AACOG Regional Solid Waste Management Plan (RSWMP).

On April 22, 2020, the AACOG Board of Directors approved the RRC recommendation to submit a letter to TCEQ acknowledging the facilities comply with AACOG's RSWMP contingent upon AACOG receiving approval for the facilities from either the Atascosa County Judge or the Precinct Commissioner in which the facilities would be located.

Concurrence with the proposed MSW facilities was received from the Atascosa County Judge and Atascosa County Commissioner representing Precinct 4 on April 28, 2020.

Please do not hesitate to contact Christopher Moken at cmoken@aacog.com for any questions or comments on this letter.

Sincerely,

Diane D. Rath **Executive Director** March 31, 2020

Hon. Robert L Hurley
County Judge
Project Review Letter Request
Atascosa County
1 Courthouse Circle Dr., Suite 101
Jourdanton, TX 78026

Certified	Mail:	

Re:

Type V Registration Application Terrabella Environmental Services Inc Pleasanton Processing Facility Pleasanton, Atascosa County, Texas

Dear Hon. Robert L Hurley:

On behalf of our client Terrabella Environmental Services Inc (TES), Q&A Diversified LLC would like to take this opportunity to inform you of a TES application to the Texas Commission on Environmental Quality (TCEQ) for a *Type V Registration* for the operation for a municipal solid waste (MSW) transfer facility. The facility address is 433 Zander Lane, Pleasanton, Atascosa County, TX 78064. Please refer to the General Location Map available online at https://www.qnadiversified.com/permits.

I am requesting acknowledgement, in writing, that the TES MSW Transfer Facility will be in compliance with the local solid waste plan. In accordance with the rules, this letter of acknowledgement will be submitted to the TCEQ application review personnel.

Thank you for your time and assistance. If you have any questions or need additional information, please call me at 210-896-8711 or email me at hildag@gnadiversified.com.

Sincerely,

Hilda R. Quinones, P.E.

Enclosure

The document on our website is titled "Terrabella Liquid Waste MSW Application Zander Lane."





Robert L. Hurley
Atascosa County Judge
1 Courthouse Circle Dr. Suite 206
Jourdanton, Texas 78026
countyjudge@atascosacounty.texas.gov
830-769-3093

April 28, 2020

- Re: 1. Medical Waste Transfer & Processing Facility 433 Zander Lane, Pleasanton, TX 78064
 - 2. Liquid Waste MSW Facility 433 Zander Lane, Pleasanton, TX 78064
 - 3. Medical Waste Transfer Station 5376 FM 1784, Pleasanton, TX 78064

To Whom It May Concern;

Regarding the three applications for Terrabella Environmental Services Inc. (TES): Type V medical waste transfer site to be located at 433 Zander Lane, Pleasanton, Atascosa County, Texas; Type V Registration for the operation of a municipal solid waste transfer facility at 5376 FM 1784, Pleasanton, Atascosa County, Texas and Type V Registration for the operation of a municipal solid waste (MSW) transfer facility at 433 Zander Lane, Pleasanton, Atascosa County, Texas. TES has made contact with the Atascosa County Commissioners Court regarding each of these applications informing us of the processes and plans. We have determined that they will be in compliance with the Atascosa County solid waste plan for each of the aforementioned projects.

If you should have any questions please do not hesitate to contact this office.

Sincerely,

Robert L. Hurley

Atascosa County Judge

March 31, 2020

Kennard "Bubba" Riley
County Commissioner – Precinct 4
Project Review Letter Request
Atascosa County
1 Courthouse Circle Dr., Suite 105
Jourdanton, TX 78026

Re: Type V Registration Application

Terrabella Environmental Services Inc Pleasanton, Atascosa County, Texas

Dear Mr. Riley:

On behalf of our client Terrabella Environmental Services Inc (TES), Q&A Diversified LLC would like to take this opportunity to inform you of a TES application to the Texas Commission on Environmental Quality (TCEQ) for a Type V medical waste transfer site. The medical waste transfer station will process, store, and transfer medical waste, outdated/off specification pharmaceuticals and seized drugs. Sources of these waste streams include hospitals, clinics, nursing homes, and other health care related facilities. In addition to these waste streams, the facility may accept Animal and Plant Health Inspection Services (APHIS) and International Maritime Pollution Protocol (MarPol) wastes.

The facility address is 433 Zander Lane, Pleasanton, Atascosa County, TX 78064. Please refer to the General Location Map available online at https://www.qnadiversified.com/permits. The document is titled "Terrabella Medical Waste Processing Application Zander Lane." The drawings located int eh application will provide you with information regarding not only the facility location, but also general land use.

I am requesting acknowledgement, in writing, that the TES Processing Facility will be in compliance with the local solid waste plan. In accordance with the rules, this letter of acknowledgement will be submitted to the TCEQ application review personnel.

Thank you for your time and assistance. If you have any questions or need additional information, please call me at 210-896-8711 or email me at hildaq@qnadiversified.com.

Sincerely,

Hilda R. Quinones, P.E.

Enclosure



March 31, 2020

Mark Wolfe State Historic Preservation Officer Texas Historical Commission P.O. Box 12276 Austin, TX 78711-2276

Re: Type V Registration Application

Terrabella Environmental Services Inc Pleasanton, Atascosa County, Texas

Dear Mr. Wolfe:

Q&A is preparing a Type V *Medical Processing Registration* application for Terrabella Environmental Services Inc located at 433 Zander Lane, Pleasanton, Atascosa County, TX 78064. Please refer to the enclosed General Location Map and Topographic Map. The registration application is being prepared to allow Terrabella Environmental Services Inc to transfer, store and treat regulated medical waste.

This letter is being written in accordance with the TCEQ MSW Regulation 30 TAC 330.61(o) which states:

"The owner or operator shall submit a review letter from the Texas Historical Commission documenting compliance with the Natural Resources Code, Chapter 191, Texas Antiquities Code."

I am requesting acknowledgement, in writing, that the Terrabella Environmental Services Inc's Processing Facility complies with the current Texas Historical Commission's requirements. If you determine that the above referenced project may proceed, past practices of stamping the request letter with your determination is acceptable documentation. In accordance with the rules, this letter of acknowledgement will be submitted to the TCEQ application review personnel.

Thank you for your time and assistance. If you have any questions or need any additional information, please call me at 210-896-8711 or e-mail me at hildaq@qnadiversified.com.

Sincerely,

Hilda R. Quinones, P.E.

Enclosure



TCEQ CORE DATA FORM(S)



TCEQ Core Data Form

TCEQ Use Only

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

SECTION I: General Information							
Reason for Submission (If other is checked please describe in space provided.)							
New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)							
Renewal (Core Data Form should be submitted with the renewal form)							
2. Customer Reference Number (if issued) Follow this link to search 3. Regulated Entity Reference Number (if issued)							
CN 604334904	for CN or RN numbers in Central Registry**	RN 110896578					

SECTION II: Customer Information 4. General Customer Information 5. Effective Date for Customer Information Updates (mm/dd/yyyy) 3/1/2020 New Customer □ Update to Customer Information Change in Regulated Entity Ownership Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts) The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA). 6. Customer Legal Name (If an individual, print last name first: eq: Doe, John) If new Customer, enter previous Customer below: Terrabella Environmental Services Inc 7. TX SOS/CPA Filing Number 8. TX State Tax ID (11 digits) 10. DUNS Number (if applicable) 9. Federal Tax ID (9 digits) 801586147 12634459726 11. Type of Customer: □ Corporation Individual Partnership: General Limited Other: Government: ☐ City ☐ County ☐ Federal ☐ State ☐ Other Sole Proprietorship 12. Number of Employees 13. Independently Owned and Operated? 101-250 251-500 501 and higher X Yes ☐ No 14. Customer Role (Proposed or Actual) - as it relates to the Regulated Entity listed on this form. Please check one of the following Owner Operator Owner & Operator Occupational Licensee Responsible Party ☐ Voluntary Cleanup Applicant Other: PO Box 39 15. Mailing Address: ZIP + 4 ZIP 78050 0039 City Leming State TX17. E-Mail Address (if applicable) 16. Country Mailing Information (if outside USA) mcarr@terrabellaes.com 18. Telephone Number 19. Extension or Code 20. Fax Number (if applicable) (210)892-4496 (210) 892-4497

SECTION III: Regulated Entity Information

23. Street Address the Regulated Entit (No PO Boxes) 24. County 25. Description to	y:	3 Zar	nder Lane								- 4	
24. County 25. Description to												
25. Description to	City	/	Pleasante	on	State	TX		ZIP	780	064	ZIP + 4	
	Ata	ascos	a						1,0	001	2.11 . 4	
		En	ter Physical L	ocatio	n Descrin	tion if no	etrooi	addross	ic prov	idad		
Physical Location:					2 000119		311001	aduless	is prov	iueu.		
26. Nearest City			A						State		Ne	arest ZIP Cod
27. Latitude (N) In	Decimal:		28.98276	50		1.	20 1 6	naitudo (IA/\ I	Desimal	00.4415	1000
Degrees	Minut	es	20.70270	Secon	ds		Degree	ongitude (vv) ir	Decimal:	-98.4417	Seconds
28			58		56.33		-5	98			26	32.30
29. Primary SIC Cod	le (4 digits)	30.	Secondary SI	C Cod		31. Pi	rimar	NAICS C	ode	32. Se	condary NA	
3999		42				5416				(5 or 6 or 4841		
33. What is the Prim	ary Busine	ss of t	his entity?	(Do not i	epeat the SIC	or NAICS d	escripti	on.)				
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FEE RECEIPT OR COPY OF CHECK

RN110896578 Medical Processing Facility Initial Application Submittal Date (03/31/2020)

Questions or Comments >>

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Transaction Information

Trace Number: 582EA000386002

Date: 03/27/2020 03:20 PM

Payment Method: CC - Authorization 0000036293

Amount: \$150.00
ePay Actor: Hilda Quinones

Actor Email: hildaq@qnadiversified.com

IP: 24.28.151.54

-Payment Contact Information -

Name: Hilda Quinones
Company: Q&A Diversified Llc

Address: 9542 Bertram St, San Antonio, TX 78251

Phone: 210-896-8711

Cart Items

Click on the voucher number to see the voucher details.

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MANUFACTURER SPECIFICATIONS FOR WASTE MANAGEMENT UNITS

1.1 Bondtech Autoclave/Sterilizer System Specifications

High vacuum/High pressure, Computer controlled, Bondtech autoclave system to treat biomedical waste on-site

1.1.1 AUTOCLAVE DIMENSIONS AND CAPACITY

Waste Density Assumption: 5.5 lbs/ ft3

MODEL	Bins/Load	Volume/Cycle	Capacity/Cycle (Cycle Time: ~45 міл)	Capacity/Hour
B]17(5)X(9)	3.	99 ft ³	545 llas	726 lbs

1.1.2 AUTOCLAVE VESSEL SPECIFICATIONS

Working Pressure

Pressure Vent

75 PSIG

Opening Assembly Loading Arrangement Single Door/Quick Opening Door/Safety Pin Interlock

Horizontal

Spray Condenser

1.1.3 INSULATION

The exterior of the autoclave will be insulated with 2" of fiberglass, which will be covered with a white aluminum jacket to protect the insulation, and to make sure the equipment can be kept clean.

1.1.4 PROCESS VALVES

Complete with the process valves including steam supply, pressure vent and safety relief. The steam inlet valve is a high-resolution pneumatic proportional valve for a smooth accurate control of steam pressure. For safety, the steam inlet valve is a normally closed valve that closes in the event of any power loss.

1.1.5 AUTOCLAVE VESSEL DESIGN

The autoclave vessel is designed, fabricated, tested and certified in accordance with the ASME Boiler and Pressure Vessel Code, Section VIII, Division 1, for Unfired Pressure Vessels. The vessel is designed for full vacuum. The sterilization unit is formed and welded into a horizontal cylindrical pressure vessel with a hydraulic quick opening door. The vessel includes two rigid support saddles to facilitate a simple installation. The front face of the vessel has a machine groove for the rigid high temperature seal gasket.

1.1.6 VACUUM SYSTEM

Vacuum System:

Vacuum: 24-28" Hg.

High Efficiency Steam Ejector.

Vacuum Capability:

24"-28" Hg, 3-4 minutes

Pre-vacuum:

The pre-vacuum process will evacuate the autoclave 24"-28" Hg. This process will achieve the removal of air from the autoclave to provide a quick and efficient penetration of steam

throughout the medical waste load.

Post-vacuum:

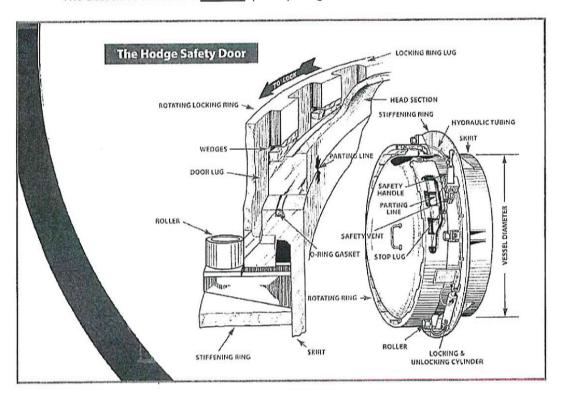
The post-vacuum process removes excess steam from the vessel and expedites the steam purging process. This process removes excess moisture from waste load resulting in a lighter/drier treated waste product for disposal. Moisture removal effectively controls nuisance odors.

1.1.7 STEAM CONDENSER

Independent steam condenser manufactured of pressure-grade steel. The condenser is designed for quick and efficient steam purge from the autoclave vessel. Process steam is fully condensed externally to the autoclave vessel. **Steam purge process is completed within approx 1.5 minutes.**

1.1.8 DOOR OPERATION, SEALING AND LOCKING MECHANISM

The autoclave includes a **HODGE** quick opening door as shown below.



The door is hinged mounted on the autoclave. Mounting arrangements provide full movement to a full open position. Preferred sealing systems utilize one-piece extruded material O-ring seal type (Fixed O-Ring Seal). The door has a positive lock type safety design per the ASME requirements. The locking mechanism is interlocked with the control system to prevent opening the door while under pressure, and to prevent pressurization when the door is unlocked.

The door is designed with several safety features that include electric/mechanical interlock switch, PLC interlock, door safety handle interlock, visual site gauge for pressure monitor and analog dial pressure/temperature indicators.

1.1.9 MATERIAL HANDLING: AUTOMATIC LIFT TABLE

Bondtech Automatic Lift Table Tracks are provided at the bottom of the autoclave to match the lift table. The hydraulically operated lift table provides for safe and easy loading and unloading of the autoclave vessel. Operator operates lift table with a simple two position (up or down) switch.

With the Bondtech lift table, there are no ramps for loading and unloading. Automatic Lift table provides for safe and easy loading and unloading of autoclave bins.

1.1.10 SYSTEM PIPING

The autoclave system will be completely piped at the factory prior to shipment for simple installation. The system piping will consist of the following:

- Steam condenser piping steam outlet piping direct to steam condenser. Steam is condensed by controlling water flow through the steam condenser with respect to steam pressure inside the vessel. The water flow control minimizes the consumption of water.
- Condensate Drains Steam traps (2) front and rear steam traps maintain the vessel free
 of condensate.
- Vacuum Valve/Piping autoclave is hard piped to either steam ejector or vacuum pump for integrating vacuum system to vessel
- Steam Inlet Valve/Strainer proportionally controlled steam inlet valve for smooth and accurate control of steam pressure inlet. Steam inlet valve is controlled by a PID loop controlled by the PLC.

1.1.11 CONTROL SYSTEM/PROCESS VALVES/CONTROL PANEL & INSTRUMENTATION

The autoclave control panel is package in a NEMA 12 rated panel. The autoclave system is controlled by a state-of-the-art "SuperMicro" Programmable Logic Controller (PLC) with modem hookup capabilities for online support. The PLC performs automatic sterilization control control that includes pre-vacuum, pressurization/heat soak, vent and post-vacuum. The PLC monitors pressure vessel conditions for providing safety interlock for door operation.

1.1.12 (a) SUPERMICRO PROGRAMMABLE LOGIC CONTROLLER (PLC)

The FX2N Series PLC provides the function controls that automatically command the process cycle steps for the autoclave system. Extensive data memory (over 8,000 Data Registers) for capturing real time operating parameters that continuously monitors autoclave system performance.

The FX2N Series PLC support on-line troubleshooting/programming functions, used in system development and commissioning. Remote programming/monitoring capability by modem provides for immediate technician support. This PLC system has the external data link integration capability for communication with other peripheral systems (PC, network, control systems, etc).

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Powerful features include:

- Windows Programming Use Ladder, List or SFC languages.
- Operator Interfaces Flexible selection to match specific customer application
- Extensive Program Memory 8,000/16,000 steps
- Extensive Data Memory 8000 Data Registers
- Enhanced Program Throughput 80 nanoseconds/step
- Enhanced Process Control Auto-Tuning, PID loop
- High-Speed Processing-60KHz counters,10ms timed&50us hardware interrupts
- Embedded Motion Control 20,000 hz pulse train, Trapezoidal ramp instructions
- High Function Math 32 bit floating point, Square Root, Trigonometry
- Year 2000 Compliant Y2K Compliant, 4 digit year
- Real Time Clock/Date For scheduling date and time stamping
- Flexible Configurations From 16 to 256 I/O & extensive special function I/O capabilities
- Communications Built-in 2nd port (RS-232/RS422/RS485) & PLC-PLC networking
- Open Network Connectivity Modules for Profibus DP, Profibus DP I/O, AS-I & CC Link

1.1.12 (b) SYSTEM PROGRAMMING

PLC program application is based on the industry standard ladder logic. Programming can be performed by authorized personnel with access to system entry code.

Simple pushbutton entry pad allows the authorized personnel to enter specific parameters including the following:

MARKE EARLY SECTIONS OF RESISTENCE PARTY.

- Pre-Vacuum Set Point
- Pre-Vacuum Timer
- Sterilization Temperature/Pressure
- Sterilization Heat Soak Time
- Vent Time Set Control
- Post-Vacuum Set Point
- Post-Vacuum Timer

In addition to the above, specific alarms are setup for triggering equipment shutdown and notifying the operator in the event that temperature and/or pressure parameters are not satisfied.

The startup program will be installed and tested by **Bondtech** technicians during startup. Efficacy testing will be performed to certify that the **Bondtech** autoclave cycle satisfies the minimum requirements established by the medical waste regulations.

1.1.13 TRULINE CIRCULAR CHART RECORDER

The control system printer is a state of the art Honeywell printer. The Honeywell Truline 4500 series printer generates continuous data that provides the history of every autoclave cycle. The printer will record and generate chart data that includes the following:

- Time and Date of every autoclave cycle.
- Cycle Start and Cycle End Time.
- Continuous Cycle Vacuum & Pressure
- Continuous Cycle Temperature

2.0 Start-up/Testing/Training.

The Bondtech start-up supervision will include the following:

Bondtech Start-up supervision, Operator Training & Equipment Documentation

Bondtech will conduct classroom and "hands-on" training sessions. The Bondtech training program will focus: 1. Safe Operation 2. Compliance 3. System Maintenance Bondtech will provide a comprehensive training program that includes the following:

- a) <u>Bondtech Medical Center SOP</u> Bondtech will develop a Standard Operation Procedure (SOP) specific for the facility's operation. The SOP will address compliance with State medical waste treatment regulations.
- b) <u>Bondtech Classroom Training</u> Bondtech will perform a classroom type training session. Personnel will receive his/her own copy of the <u>Bondtech</u> SOP. After the classroom training is completed, all trained personnel will execute the SOP Training Certification Form.
- c) <u>Bondtech Equipment Operation Training</u> After the classroom SOP training, <u>Bondtech</u> will conduct a comprehensive equipment operation & maintenance "hands-on" training session.
- d) <u>Bondtech Operation and Maintenance Manuals</u> <u>Bondtech</u> will provide two copies (three ring binders) of the <u>Bondtech</u> Operation and Maintenance (O&M) manuals. The O&M manuals will include complete installation drawings, parts/components properly identified and electrical/control wiring schematics.



General Information Package

I. General

Positive Impact Waste Solutions, LLC ("PIWS") is a manufacturer of mobile and fixedsite units for the treatment of special waste from health care related facilities ("regulated medical waste" or "RMW"). We have been processing hospital medical waste continuously since 1997 with our mobile technology - the PIWS-3000 and at fixed-site locations in Texas, Kansas and China since 2004. Our patented unit, the PIWS-3000, processes over 2,000 pounds an hour and a single unit can process over 11,000,000 pounds of waste annually. We also have a smaller unit, the PIWS-3000 On-Site Unit, which processes over 400 pounds per hour. Our patented process uses a proprietary dry chemical - Cold-Ster®, which is the only dry chemical approved by the EPA for the treatment of regulated medical waste. The PIWS-3000 renders regulated medical waste unrecognizable and landfill-ready via the general waste stream. The grinding action employed in the process reduces the waste stream by over 70%. The PIWS-3000 is environmentally friendly and does not produce any air or wastewater emissions or other hazardous by-products. Because the regulated medical waste will be processed on-site, the elimination of transportation over public roadways will significantly reduce the risk of hazardous spills for which medical facilities are responsible.

II. Company Information

Positive Impact Waste Solutions, LLC is a privately held Delaware corporation. It manufactures its patented PIWS-3000 RMW processing unit in Odessa, Texas. The company has been operating the PIWS-3000 at medical facilities continuously since 1997. Its current owners moved the manufacturing operations and headquarters to Odessa, Texas in 1999. PIWS has customers with established operations in both the United States and internationally. In 2002, PIWS partnered with companies that have placed units in operation in the Northeast United States and Texas. These companies have substantial growth plans for the United States. We also have distributed our smaller unit at hospitals in the United States. PIWS is also marketing its technology internationally with its first international units having been sold in Europe in 2001 and China in 2004. PIWS has also sold units which are operating in a number of locations throughout China under a long-term, multi-unit contract. The PIWS-3000 has two patents within the United States and international patents in China, Russia, United Kingdom, Mexico, Korea, Canada, Germany, Turkey, France, Italy, Spain and Ireland and PIWS has filed for international patent rights in several other significant international communities.

PIWS' headquarters and manufacturing complex are located in Odessa, Texas. PIWS has achieved a consistent growth rate which has allowed for continued quality service. During 2005, PIWS sold its processing operations to a larger public company (MedSolutions, Inc.) and will focus on the manufacturer and sale of the proprietary processing systems others. MedSolutions, Inc. sold their operating business including the PIWS-3000 units to Stericycle in late 2007. During PIWS' processing operations growth, the customer base included large hospital groups, including Presbyterian Hospital in Dallas, Harris Methodist Ft. Worth Hospital, Methodist Healthcare System (San Antonio), Via Christi Regional Medical Center (Wichita, Kansas), Hendrick Medical Center (Abilene, Texas), to smaller facilities in West and North Texas and small generators in Kansas which are transported to a central processing facility in Emporia, Kansas. Our customers have significant expansion plans and will use the PIWS-3000 system in their operations.

III. Business Summary

The PIWS-3000 provides hospitals and other medical facilities with an environmentally friendly, and cost-effective alternative for the treatment of regulated medical waste. The PIWS-3000 and the proprietary product Cold-Ster®, the dry chemical used in the PIWS-3000, furnish the highly fragmented and under-served RMW industry with an innovative alternative to the outdated technologies being utilized today. The mobile capability of the PIWS-3000 and the on-site treatment program provides the RMW industry with a vastly improved method of treating RMW at a time when government regulators, RMW generators, and the general public are searching for a better way of disposing of this waste.

The Company's PIWS-3000, is a patented, fully integrated machine that combines the following characteristics:

- <u>Flexibility</u>. The PIWS-3000 can be configured as either a mobile or a fixed-site unit. This flexibility allows the Company to respond to the needs of all RMW generators, large or small. In addition, the mobile capability of the PIWS-3000 will allow the system to capitalize on any further shift in the delivery of health care services (e.g. from hospitals to outpatient facilities).
- <u>Mobile/Onsite</u>. The mobile/onsite capability of the PIWS-3000 and the low cost structure provide RMW generators the one feature they most desire: cost-effective, on-site treatment of RMW in order to reduce their risk of RMW disposal. The PIWS-3000, with its mobile capability and high volume capacity, will provide the RMW industry with a treatment method that is economically, environmentally, and operationally superior to the methods currently being utilized. In this respect, the PIWS-3000 will not only compete with waste hauling companies; but, the Company will provide the RMW industry with an alternative technology which will change the way the RMW industry conducts business.
- <u>High volume</u>. The PIWS-3000 is a continuous feed RMW processor with an average volume of over 2,000 pounds per hour for the large unit and 400 pounds for the

smaller On-Site unit. Although other systems claim this throughput, the PIWS-3000 has a proven track-record of achieving these results consistently over years of use. This high volume contributes to PIWS-3000's low cost structure and allows the system to enter the commercial RMW market. This extremely high throughput is due to patented shredder technology and the proprietary Cold-Ster® dry chemical. The compact design of the PIWS-3000 allows the mobile unit to be configured in a 30-foot trailer, providing easy access to hospital treatment sites.

- <u>Cost-effective</u>. The cost of the PIWS-3000 combined with the unit's high volume capability provide users with a low cost structure. This low cost per pound of treated RMW allows the PIWS-3000 system to be price competitive with the outdated technologies being utilized today. In addition, the Company believes that the advantage of its low cost structure will be further enhanced when its competitors that use old technologies are forced to comply with current and future regulations and the demands of landfills for unrecognizable RMW.
- <u>Environmentally friendly</u>. The PIWS-3000 renders RMW unrecognizable and landfill-ready via the general waste stream. The environmental friendliness of the PIWS-3000 is further enhanced by the fact that the unit does not produce any air or wastewater emissions or other hazardous by-product.
- "<u>Cradle to Grave</u>" <u>Responsibility</u>. Of major importance to medical waste generators is the "cradle to grave" responsibility factor defined by federal and state regulations. Large and small generators are held liable for their RMW as long as it remains untreated or recognizable. It is this responsibility that drives the interest in more effective treatment, thus ending the cycle and liability of the generator. Treatment of the waste at the point of origin offers the greatest opportunity for risk reduction.

IV. Summary of PIWS' Process

The PIWS-3000 is located on site at facilities or the waste is taken to a central processing facility where small generators are gathered for centralized processing. The PIWS-3000 has an on-board computer interface that monitors the entire process. The operator stages and loads the waste directly into a feed hopper. The feed hopper captures the net weight of the load and the computer identifies the date and time. The proper amount of the registered dry chemical and water mist required to treat the volume of waste to be processed is then added. The automated cart lift mechanism transfers the waste into twin treatment chambers for the large unit and a single grinding chamber for the smaller unit, where the registered dry chemical is chemically bound to the waste material. The RMW is ground and mixed for approximately 10-30 minutes per load. This process balances the pH level and renders the organic material and microbiological organisms noninfectious. In addition, the processing blades of the PIWS-3000 reduce the original volume by more than 70% and renders the waste unrecognizable. The treated material is continuously monitored as it is augured out for the required pH level. The treated material is then emptied into the medical facility's general waste stream. The PIWS-3000's on-board computer captures all required information for permanent and regulatory records.

SUITABLE WASTE TYPES FOR THE PIWS-3000 PROCESSING

CLASS 1 CULTURES AND STOCKS

- CULTURES AND STOCKS FROM MEDICAL AND PATHOLOGICAL LABS
- CULTURES AND STOCKS OF INFECTIOUS AGENTS FROM RESEARCH AND INDUSTRIAL LABS
- DISCARDED LIVE AND ATTENUATED VACCINES
- WASTES FROM THE PRODUCTION OF BIOLOGICALS
- CULTURE DISHES AND DEVICES USED FOR TRANSFER, INOCULATE AND MIX CULTURES

CLASS 2 PATHOLOGICAL WASTES

CLASS 3 HUMAN BLOOD AND BLOOD PRODUCTS

- WASTE HUMAN BLOOD AND BLOOD PRODUCTS
- ITEMS SATURATED OR CAKED WITH BLOOD
- INTRAVENOUS BAGS AND TUBING

CLASS 4 USED SHARPS

- ALL SHARPS USED IN HUMAN PATIENT OR ANIMAL CARE
- HYPODERMIC NEEDLES
- SYRINGES
- PIPETTES
- SCALPEL BLADES
- BLOOD VIALS AND TEST TUBES
- CULTURE DISHES
- BROKEN OR UNBROKEN GLASSWARE THAT WERE IN CONTACT WITH INFECTIOUS AGENTS

CLASS 5 ANIMAL WASTE

- BEDDING OF ANIMALS EXPOSED TO INFECTIOUS AGENTS FOR PRODUCTION OF BIOLOGICALS OR PHARMACEUTICAL TESTING

CLASS 6 ISOLATION WASTES

- BIOLOGICAL WASTE AND MATERIALS CONTAMINATED FROM HUMANS OR ANIMALS WHO ARE ISOLATED FOR HIGHLY COMMUNICABLE DISEASE

CLASS 7 UNUSED SHARPS

- UNUSED SHARPS INCLUDING HYPODERMIC NEEDLES, SUTURE NEEDLES, SYRINGES, AND SCALPEL BLADES

ADDITIONAL STORAGE AND PROCESSING UNIT CLOSURE COST ITEMS

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CONFIDENTIAL DOCUMENTS

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