Texas Commission on Environmental Quality Application for a Medical Waste Registration Terrabella Environmental Services - RN106033178 Registration 40314

Pleasanton, Atascosa County, Texas

Initial Application Date: 31 MARCH 2020

Application Revision Date: 15 JUNE 2020 Application Revision Date: 12 AUGUST 2020

Prepared for

TERRABELLA ENVIRONMENTAL SERVICES INC

5376 FM 1784

Pleasanton, TX 78064

Prepared by

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Q&A Diversified, LLC

Texas Registered Engineering Firm F-15923

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San Antonio, TX 78245



August 12, 2020

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May 13, 2020

Section 1— General Information

1.1	Facility Information	(must match	regulated	entity i	nformation	on
Core	Data Form)					

Facility Name: Terrabella Environmental Services
Regulated Entity Reference No. (if issued): RN <u>106033178</u>
Physical or Street Address (if available): <u>5376 FM 1784</u>
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): 29° 4' 47.2" N
Longitude (Degree, Minutes, Seconds, or Decimal Degrees): 98° 25' 11.02" W
Activities Conducted at the Facility (check all that apply)
⊠ Storage □ Treatment ⊠ Transfer □ Other: □
Describe the location of the facility with respect to known or easily identifiable landmarks:
The facility is located 0.9 miles NE of Interstate Highway 37 (IH-37) and FM1784.
Detail access routes from the nearest United States or state highway to the facility:
Heading northbound on IH-37, take FM536 exit. Turn left onto FM 536 W, then turn left onto FM 1784 and travel until you reach the address. A common dirt road is shared with the most adjacent residence 300 feet away.
1.2 Applicant Information
The owner of a facility is the applicant, to whom the registration would be 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 No. (if issued): CN <u>604334904</u>
Mailing Address: PO Box 39
City: <u>Leming</u> County: <u>Atascosa</u> State: <u>Texas</u> Zip Code: <u>78050</u>
(Area Code) Telephone Number: <u>210-892-4496</u> Email Address: <u>mcarr@terrabellaes.com</u>

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: _____ County: ____ 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 Street Address or P.O. Box: <u>2154 S. Second St.</u> City: <u>Pleasanton</u> County: <u>Atascosa</u> State: TX Zip Code: <u>78064</u> (Area Code) Telephone Number: 830-281-5384 Email Address:

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: 7806
(Area Code) Telephone Number: 830-569-3867 Email Address: mayor@pleasantontx.g
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: <u>8700 Tesoro Dr, Suite 160</u>
City: San Antonio County: Bexar State: TX Zip Code: 7821
(Area Code) Telephone Number: <u>210-362-5260</u> 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: 7822
(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: <u>1 Courthouse Circle Dr, Suite 206</u>
City: <u>Jourdanton</u> County: <u>Atascosa</u> State: TX Zip Code: <u>7802</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

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

Street Address or P.O. Box: 7430 Louis Pasteur Dr

District Office Address: 1411 Bensdale Rd, Room 108

City: <u>Pleasanton</u> County: <u>Atascosa</u> State: TX Zip Code: <u>78064</u>

(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: <u>210-784-5024</u> 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.qnadiversified.com/permits

1.5 Copy of Application for Public Viewing

Name of the Public Place: Pleasanton Public Library

Physical Address: 115 N Main St

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

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

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:

☑ Applicant (Owner or Operator)
☐ Consultant

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 462847 and 462848

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:

Information such as the character of surrounding land uses within one mile of the property is incorporated in the Land Use Map (Attachment 3). The facility is located on a developed property surrounded by a mixture of mostly commercial, farmland, residential and fields. Land use was obtained from the Atascosa County Appraisal District records.

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

Based on historic aerial photographs, there has not been significant growth or development in the area immediately surrounding the facility. However, in the past 10 years there has been some residential and commercial development within five miles of the facility. Most notably there has been some industrial warehousing and commercial development along FM 1784 intersecting with FM 536 located just 1.2 miles from the facility.

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:

As shown in the Land Use Map (Attachment 3), there are 96 parcels of land with use as follows: nine (9) parcels are categorized as commercial, one (1) parcel is an RV park, one (1) parcel is parking, 51 parcels are residential, and the remaining parcels are either used as empty fields, farmland or pasture. The nearest commercial establishment is 0.3 miles west of the facility and is currently used as a logistics truck yard. The nearest residence is located in the subdivision located approximately 100 feet to the east. There are no historic or archaeologically significant structures or sites having exceptional aesthetic quality within one mile of the facility.

Indicate the distance to the nearest residence(s): _	100	$_$ $oxtimes$ feet \Box miles
Provide directions to the nearest residence(s):		

The facility is located at 5376 FM 1784, Pleasanton, TX 78064. Heading northbound on IH-37, take the FM 536 exit. Turn left onto FM 536 W, then turn left onto FM 1784 and travel until you reach the address. A common dirt road is shared with the most adjacent residence 300 feet away.

Indicate the distance to the nearest commercial establishment(s): 395 ⋈ feet □ miles

Provide directions to the nearest commercial establishment(s):

Heading northbound on IH-37, take the FM 536 exit. Turn left onto FM 536 W, then turn left onto FM 1784 and travel until you reach the address. The commercial establishment can be found directly across from the property gate approximately 392 feet east of the facility.

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
IH-37	Concrete, 4 Lanes
FM 536	Asphalt, 2 Lanes
FM 1784	Asphalt, 2 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	10 vpd
Expected Vehicle Traffic	4 vpd
Projected Vehicle Traffic Generated by Facility	14 vpd

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

FM 1784 is designated as a minor collector road, leading to a principal arterial to the south TX-97 and a Major Collector FM 536 to the north. Both TX-97 and FM 536 lead directly to IH-37. IH-37 is a primary route and TX-97 is a secondary route within TXDOT Freight Network. Future Traffic along FM 1784, FM 536, TX-97 and IH-37 is calculated as 2% growth rate and percent truck is 24 hour.

The annual average daily traffic count for FM 1784 near the site going northbound is 963 vehicles/day and 935 vehicles/day going southbound towards TX-97. The count on FM 536 towards IH-37 is 2,021 vehicles/day and the count on TX-97 towards IH-37 is 5,042 vehicles/day. The count on IH-37, west of the facility, is 29,730.

An average 14 vehicles/day are expected to be generated by the facility at the permitted operating capacity. The expected traffic volume is estimated assuming we empty two storage tanks per week, plus 12 vehicles for incoming waste from facilities, employees and visitors resulting in 14 vehicles per day. This volume will be distributed throughout the day and will not cause any disruption of normal traffic patterns. This volume includes current activity at the facility of about 10 vehicles per day which would result in about 4 added vehicles per day.

A map, derived from the Texas Department of Transportation (TXDOT) Statewide Planning Map available on the TXDOT website, exhibiting existing (2013) and future (2033) annual average daily traffic (AADT) in vehicles per day (vpd) and their locations within a one mile radius of the property boundary is shown as Attachment 2 – Figure 4.

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):

Not applicable.

2.3	Floodplain and	Wetlands	[30 TAC	§326.7	1(f)]
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Will the facility be located within a 100-year floodplain?				
Yes □ No ☒ Identify the floodplain zoneX				
Attach a copy of the Federal Emergency Management Administration administrator (FEMA) flood map for the area.				
If the facility will be within a 100-year floodplain, attach documentation demonstrating that the facility is designed and will be operated in a manner to prevent washout of waste during a 100-year storm event, or that the facility has obtained a conditional letter of map amendment from the FEMA.				
Will the facility be located in wetlands?				
Yes □ No ⊠				
If yes, attach documentation to the extent required under Clean Water Act, §404 or applicable state wetlands laws.				

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

Is the buffer zone in any location at the facility less than 25 feet wide?

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):
Not applicable.

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
Storage Tanks	0			
Storage Area	0			
Containers	0			
Totes	0			
Unrefrigerated Containers	2	None. Typical semi-trailers and box trucks.	Varies (24ft to 50ft trailers/trucks)	Varies (30-130 cubic yards)
Refrigerated Containers	1	Watertight, semi trailer	53 ft (L) X 97.5 in (W) X 104 in (H)	20 tons

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):

No waste storage or treatment will occur on site beyond truck-to-truck transfer, therefore foundations and supports are not applicable. Waste will be transferred from truck-to-truck and will temporarily remain on site in locked transportation units (trucks).

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):

Waste will be loaded/unloaded directly from truck-to-truck thereby minimizing rain or surface water from running onto, into or off the loading areas. No waste will be loaded or unloaded in wet weather, thereby eliminating the risk of rain or surface water from running onto, into or off the loading areas. Transportation units are fully enclosed and watertight. Waste containers are sealed and will not be opened onsite thereby preventing spills or any contact with rainwater or surface runoff.

In the event of a spill, the waste will be collected and packaged in accordance with Texas Commission on Environmental Quality 30 TAC 326.19, United States Department of Transportation 49 CFR '178, and Occupational Safety and Health Administration 29 CFR '1910. Any contaminated water generated from contact with untreated medical waste resulting from a spill will be absorbed with paper towels, cloth or equivalent material, managed as untreated medical waste and placed in a disposal unit for transfer to a permitted treatment facility. Working surfaces, including containers, that have come into contact with untreated medical waste will be sanitized with a commercial grade disinfectant.

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.

Not Applicable.

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 PLAN

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.

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

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.

<u>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.</u>

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	LS	1	2,500	2,500
2	Bid Document and Procurement	NA			
3	Contract Award and Administration	NA			
4	Clean-Up, Removal and Transport of Waste Stored On- Site	TON	20	100	2,000
5	Disposal of Waste at an Authorized Facility	TON	20	50	1,000
6	Waste Treatment	TON	NA	NA	NA
7	Process Units Dismantling	NA	NA	NA	NA

8	Wash Down and Disinfection of Facility and Processing Units	LS	1	2,000	2,000
9	Vector Control	NA			
10	Site Security	NA			
11	Signs, Newspaper Notice and TCEQ Notice	LS	1	3,000	3,000
12	Facility Inspection and Closure Certification by Licensed Engineer	LS	1	4,000	4,000
13	Additional Storage and Processing Unit Closure Cost Items (describe in attachments)	NA			
14	Storage and Processing Unit Closure Costs Subtotal	NA			14,500
15	Contingency Cost 15%	NA	NA	NA	2,175
16	Total Closure Cost Estimate	NA	NA	NA	16,675

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.

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 transfer medical waste and outdated/off specification pharmaceuticals.

Outdated / off specification pharmaceuticals will be treated as nonhazardous waste. 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. Seized drugs are regulated by the US Drug Enforcement Administration (USDEA) and will not be accepted at the facility.

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.

The management of these waste streams will in no way cause the operation of the facility to deviate from these Operational Standards or other applicable Federal, State or Local regulations. The facility will not accept regulated hazardous wastes. Additionally, the facility is not required to accept any solid waste that is determined will cause or may cause problems in maintaining full and continuous compliance with all regulations.

The facility will transfer untreated medical waste, outdated/off specification pharmaceuticals, seized drugs, APHIS waste and MarPol waste. It is estimated the average amount of untreated medical waste received daily at the facility will be approximately 95% untreated medical waste with the remaining 5% being a mix of other approved waste streams. The facility will receive a maximum of 20 tons per day (tpd) of solid waste.

Untreated medical waste will be managed in accordance with 25 TAC Subchapter K and applicable sections found in 30 TAC Chapter 326. 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 temporarily stored at a temperature of 45 degrees Fahrenheit or less. On average, untreated medical waste is stored on-site less than 24 hours. The maximum allowable period of time that unprocessed medical waste will remain refrigerated at the facility is 60 days. Other approved waste streams will be stored for an average time of 30 days and a maximum allowable time of 60 days. All waste will be temporarily stored in locked, watertight transportation units to protect human

<u>health</u> and the environment. The maximum amount of waste to be stored at one time on site will not exceed 20 tons.

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: $\underline{20} \square$ pounds/day \boxtimes tons /day
Maximum amount of waste to be stored at any point in time: $\underline{20} \ \square$ pounds \boxtimes tons
Maximum length of time waste is to remain at the facility: $\underline{60}$ \square hours \boxtimes days
Specify the maximum time that unprocessed and processed wastes will be allowed to remain on-site:
Processed: <u>0</u> □ hours □ days
Unprocessed: 60 □ 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>Untreated medical waste will be managed in accordance with 25 TAC Subchapter K and applicable sections found in 30 TAC Chapter 326. Final disposition will be at a TCEQ approved treatment or disposal facility as applicable.</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):

Not applicable since treatment will not be taking place at this facility.

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 facility will be controlled by a perimeter fence consisting of four-foot barbed wire fence and security gate to prevent public access. Uncontrolled access to the facility, shall be prevented by the fencing and the security gate which remains closed at all times, except when the entry code is activated via the keypad. The gate closes automatically after each vehicle entry. An attendant shall be on-site during operating hours.

Additionally, all transportation units are equipped with locks. Units will remain locked except during active transfer. Access control will be maintained at all times whether waste handling activities are occurring or not.

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

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 and security gate with keypad.

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:

Operating hours will be from 7:00 a.m. to 7 p.m., Monday through Friday. The facility is not open to the general public for disposal. An attendant shall be on-site during operating hours. The facility may conduct additional temporary operating hours to address disaster or other emergency situations, or other unforeseen circumstances that could result in the disruption of waste management services in the area. Terrabella shall record, in the site operating record, the dates, times, and duration when any alternative operating hours are utilized.

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.</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 Solid 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.

Source-separated or recycled material activities are not applicable to this type of facility.

Containers Storage of Solid 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)

- (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 during the active life of the facility and will be considered part of the operating record for the facility. These plans will be available for inspection by agency representatives.
- (2) 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:
 - a. All applicable location-restriction demonstrations;
 - b. Inspection records and training procedures;
 - c. Closure plans, cost estimates, and financial assurance documentation relating to financial assurance for closure;

- d. 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;
- e. All documents, manifests, shipping documents, trip tickets, etc., involving special waste;
- f. 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 of this title (relating to Signatories to Reports) and §305.44(a) of this title (relating to Signatories to Applications) or by a duly authorized representative of the owner or operator. A person is a duly authorized representative only if:

- (i) the authorization is made in writing by the owner or operator as described in 30 TAC §305.44(a);
- (ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity or for environmental matters for the owner or operator, such as the position of plant manager, environmental manager or a position of equivalent responsibility. A duly authorized representative may thus be either a named individual or any individual occupying a named position; and
- (iii) the authorization is submitted to the executive director.

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
Address: 5376 FM 1784, Pleasanton, TX 78064

Nearest Cross Street(s): FM 1784 and Dead End 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 and a security gate which is appropriate to protect human health and safety and the environment. Uncontrolled access to the facility shall be prevented by the fencing and the security gate which remains closed at all times, except when the entry code is activated via the keypad. The gate closes automatically after each vehicle entry. An attendant shall be on-site during operating hours. Access control will be maintained at all times whether waste handling activities are occurring or not.

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

Facility Access Road 326.75(g)(2)

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

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 four-foot barbed wire fence and a security gate. Waste storage will be located inside refrigerated truck or box truck 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 dock area (See Facility Layout Plan, Attachment 2). 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)

Terrabella Environmental Services Inc does not anticipate the need for alternative operating hours for special occasions, special purpose events, holidays, or other special occurrences. If such an event does occur, the facility shall record the dates, times, and duration when any alternative operating hours in the site operating record.

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 loading/unloading dock area. In the event of heavy winds loading/unloading activities may cease 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

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

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 within the loading/unloading 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 loading dock, steps to reduce noise pollution 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, 20 tons of waste in a 24 hour period, will never be exceeded during operation. If the facility receives waste quantities that cannot be transferred 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 Transfer/Processing Facility.

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

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.

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. The control of odors may 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.

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

Personal 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 Flements

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

Not applicable since treatment will not take place at this facility.

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.

Initial Application Submittal Date (MM/DD/YYYY) Revision (MM/DD/YYYY)

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.

Title of person signing: President
Signature: Date: 25 MM2v
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, 2022.
Entry Carcuma
Notary Public in and for
THOSE County, Texas
Applicant's Delegation of Signature Authority [30 TAC §305.43]
I hereby delegate the person named below as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and appear for me at any hearing or 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.
be issued based upon this application. Name of applicant's representative:
be issued based upon this application.
Name of applicant's representative: Name of person who is the applicant, on officeror official representing corporation or public agency.
Name of applicant's representative: Name of person who is the applicant, on officer or official representing corporation or public agency that is the applicant:
Name of applicant's representative: Name of person who is the applicant, on officer or official representing corporation or public agency that is the applicant: Date: 25^A22
Name of applicant's representative: Name of person who is the applicant, on officer or official representing corporation or public agency that is the applicant: Date: 25 Marx Notarization SUBSCRIBED AND SWORN to before me by the said Michael D Carr
Name of applicant's representative: Name of person who is the applicant, on officer or official representing corporation or public agency that is the applicant: Date: 25^AA23 Notarization
Name of applicant's representative: Name of person who is the applicant, on officer or official representing corporation or public agency that is the applicant: Date: 25 AR2 Notarization SUBSCRIBED AND SWORN to before me by the said Michael D Carr On this 25 day of March , 2000.
Name of applicant's representative: Name of person who is the applicant, on officer or official representing corporation or public agency that is the applicant: Signature: Notarization SUBSCRIBED AND SWORN to before me by the said Michael D Carr On this 25 day of March , 2000. My commission expires on the day of November, 2022. Notary Public in and for
Name of applicant's representative: Name of person who is the applicant, on officer or official representing corporation or public agency that is the applicant: Date: 25 AR2 Notarization SUBSCRIBED AND SWORN to before me by the said Michael D Carr On this 25 day of March , 280. My commission expires on the day of November, 2022. Notary Public in and for
Name of applicant's representative: Name of person who is the applicant, on officer or official representing corporation or public agency that is the applicant: Signature: Date: 25 AND Notarization SUBSCRIBED AND SWORN to before me by the said Michael D Carr On this 25 day of March , 2020. My commission expires on the day of November, 2022.

Initial Application Submittal Date (MM/DD/YYYY) Revision (MM/DD/YYYY)

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: Haron J. Campbell Techabella Environmen
Signature: 2 Date: 3/25/20
Notarization
SUBSCRIBED AND SWORN to before me by the said Aaron T (ampbell
On this 25 day of Mourch , 200
My commission expires on the day of November 2022
Notary Dublish and for
Notary Public in and for A+as c as a County Texas
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-NA
Process Flow Diagrams and Narrative	9
Procedures for Operation and Testing of Treatment Equipment, if applicable	10-NA
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
FEMA Мар	15
□Facility Design Demonstration for Flood Management, or □ Conditional Letter of Map Amendment from FEMA, if applicable	16-NA

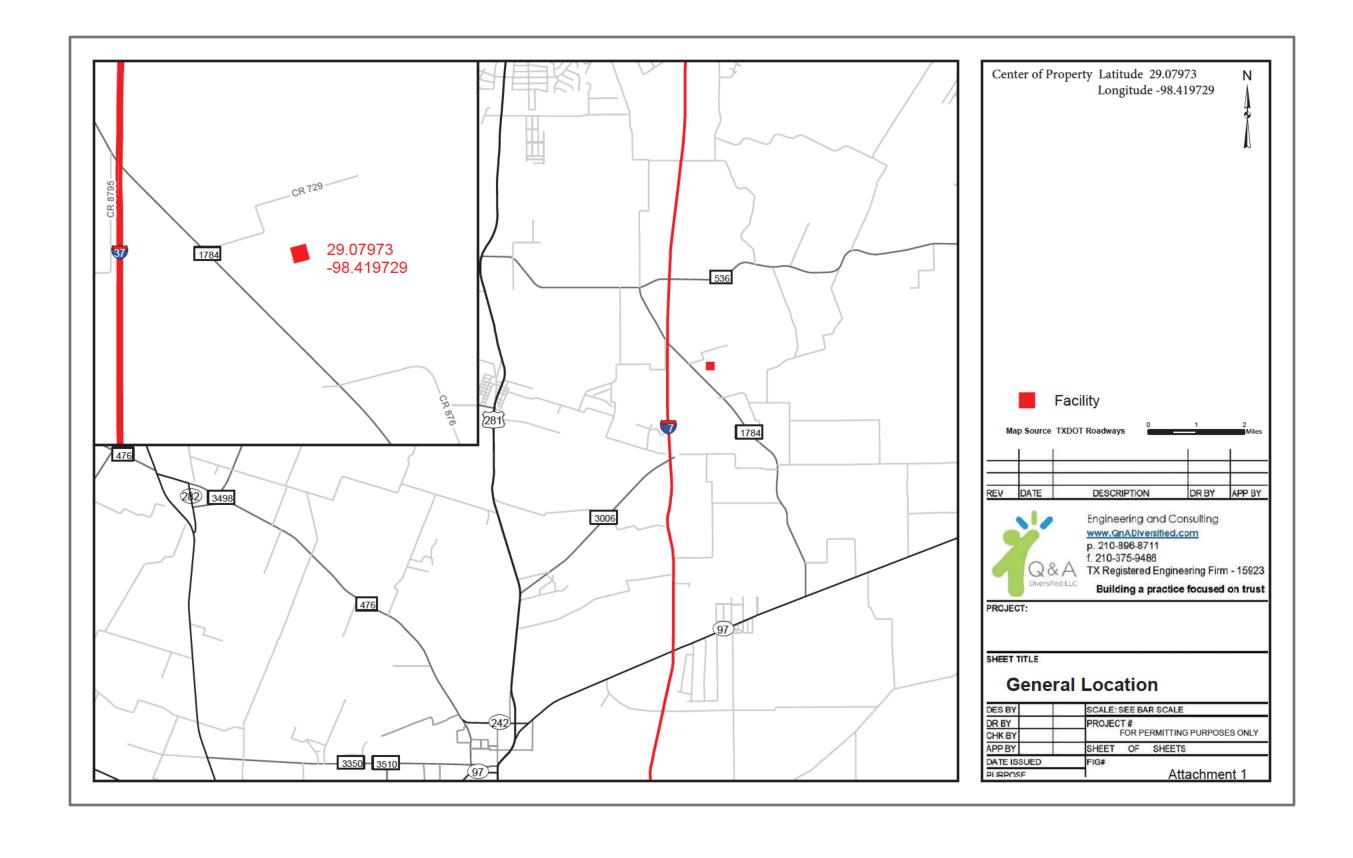
Wetland Documentation, if applicable	17-NA	
Council of Governments Review Request Coordination Letters	18	

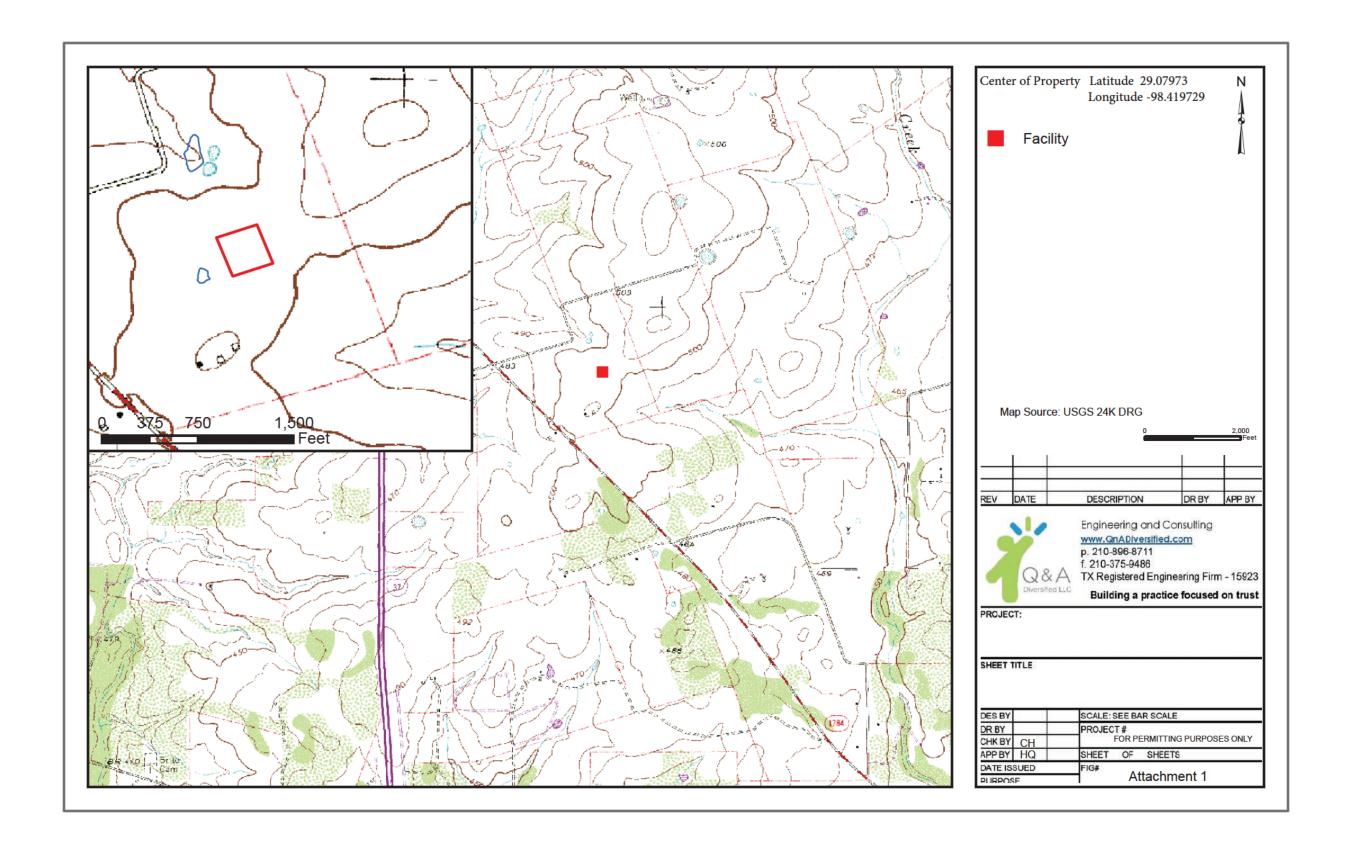
Table Att-2. Additional Attachments; check all that apply.

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
☐ Surface Water Drainage Certification	26
☑ Personnel Training Program	27

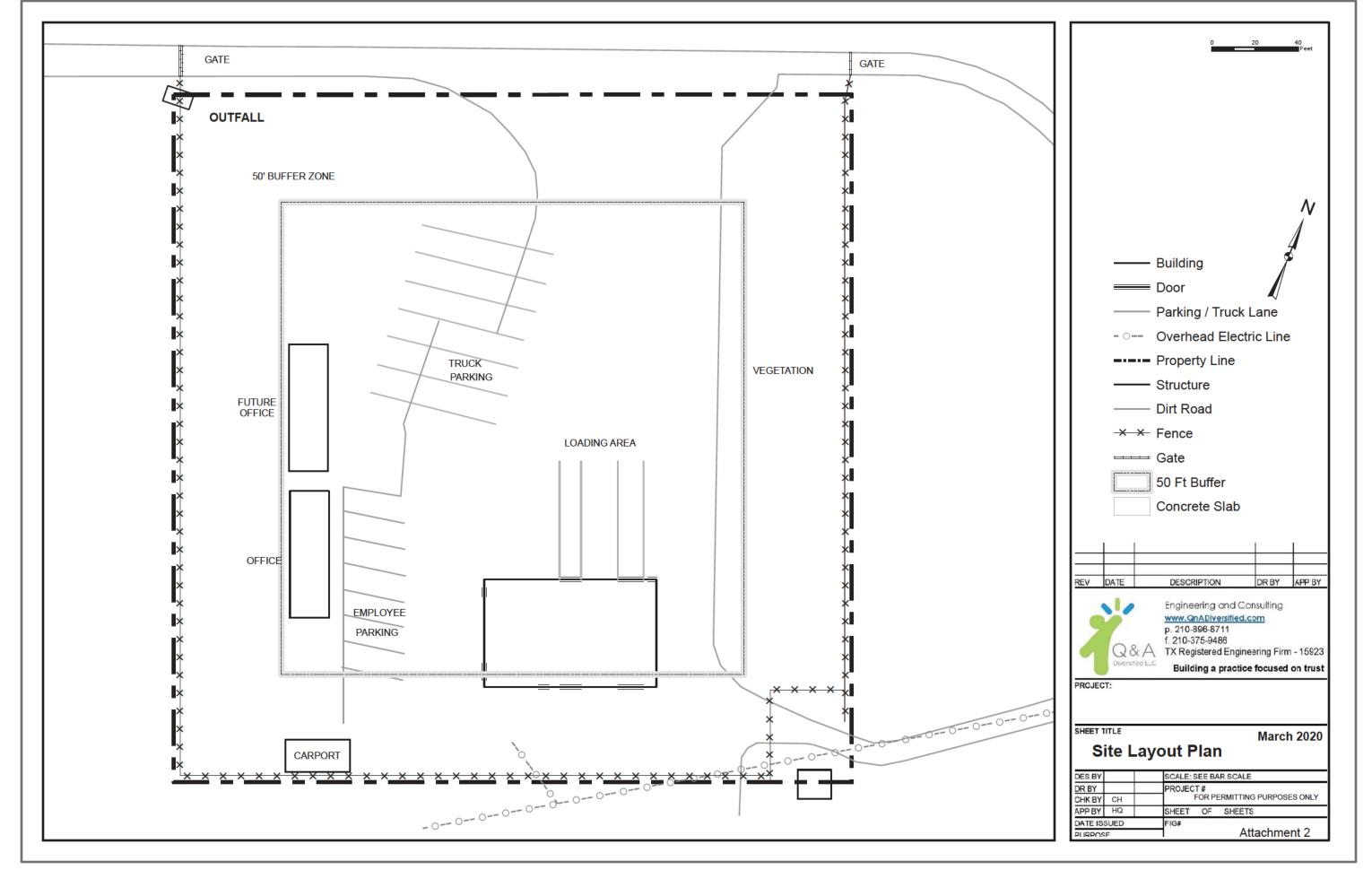
ATTACHMENT 1

GENERAL LOCATION MAP

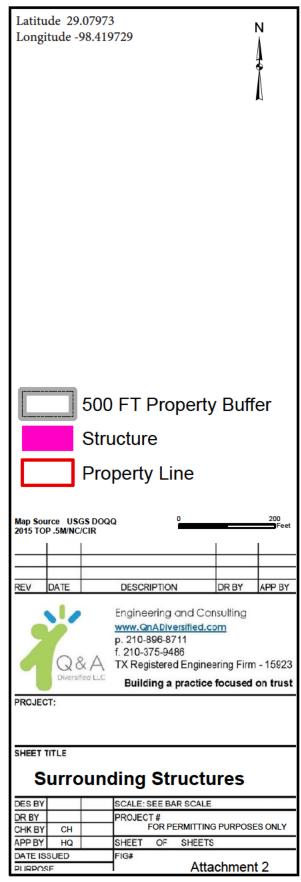


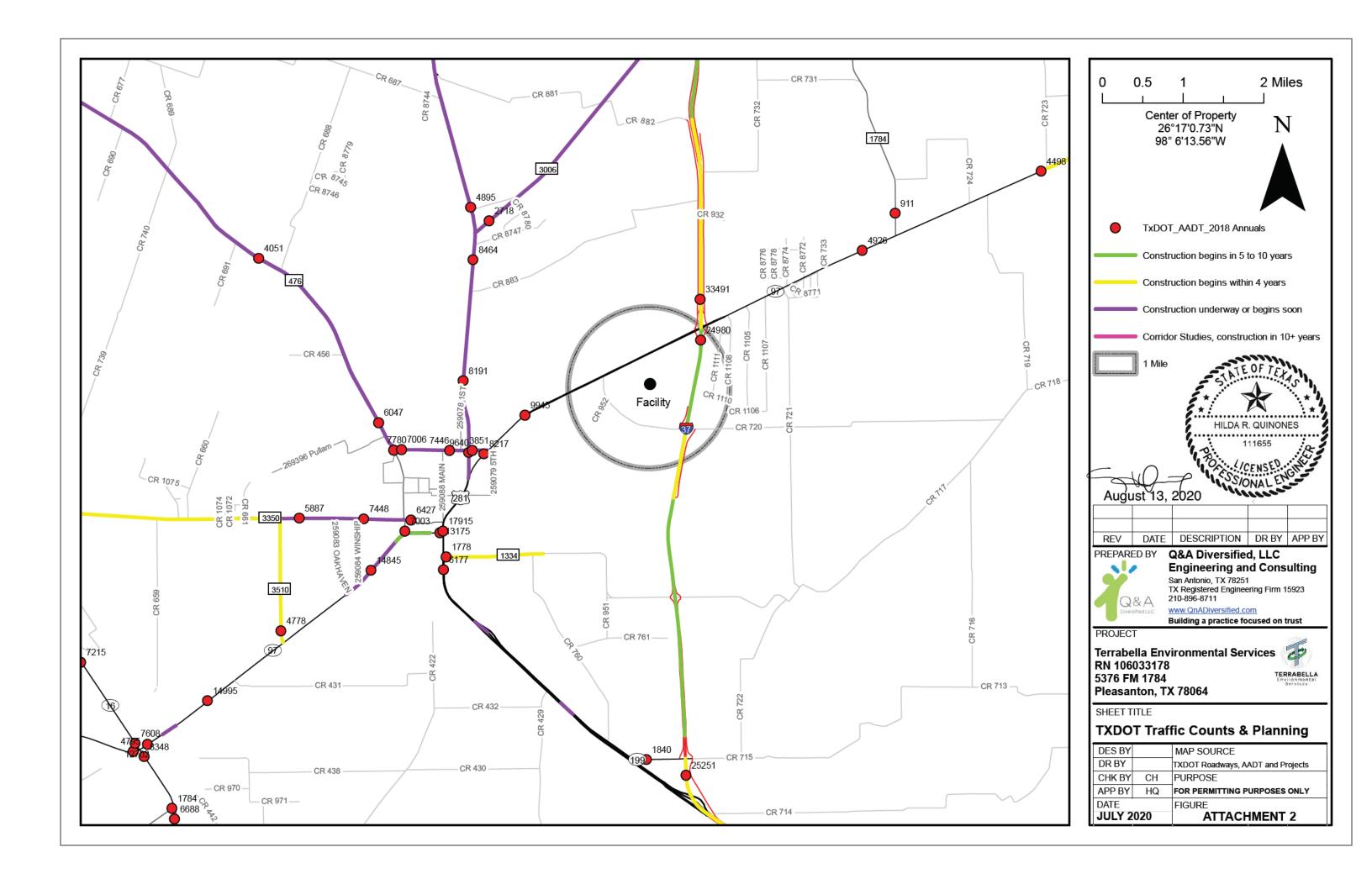


FACILITY ACCESS MAP FACILITY LAYOUT MAP

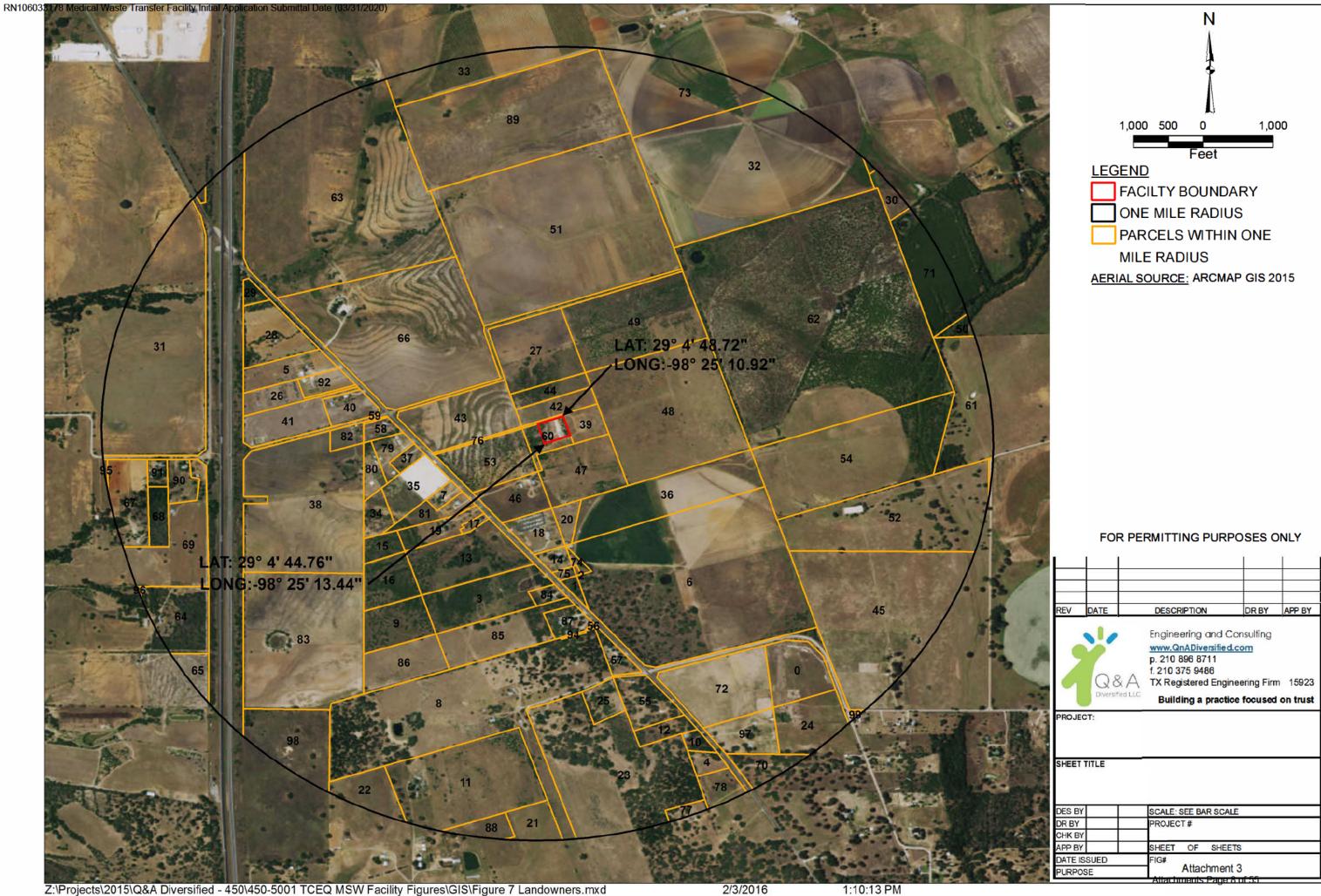




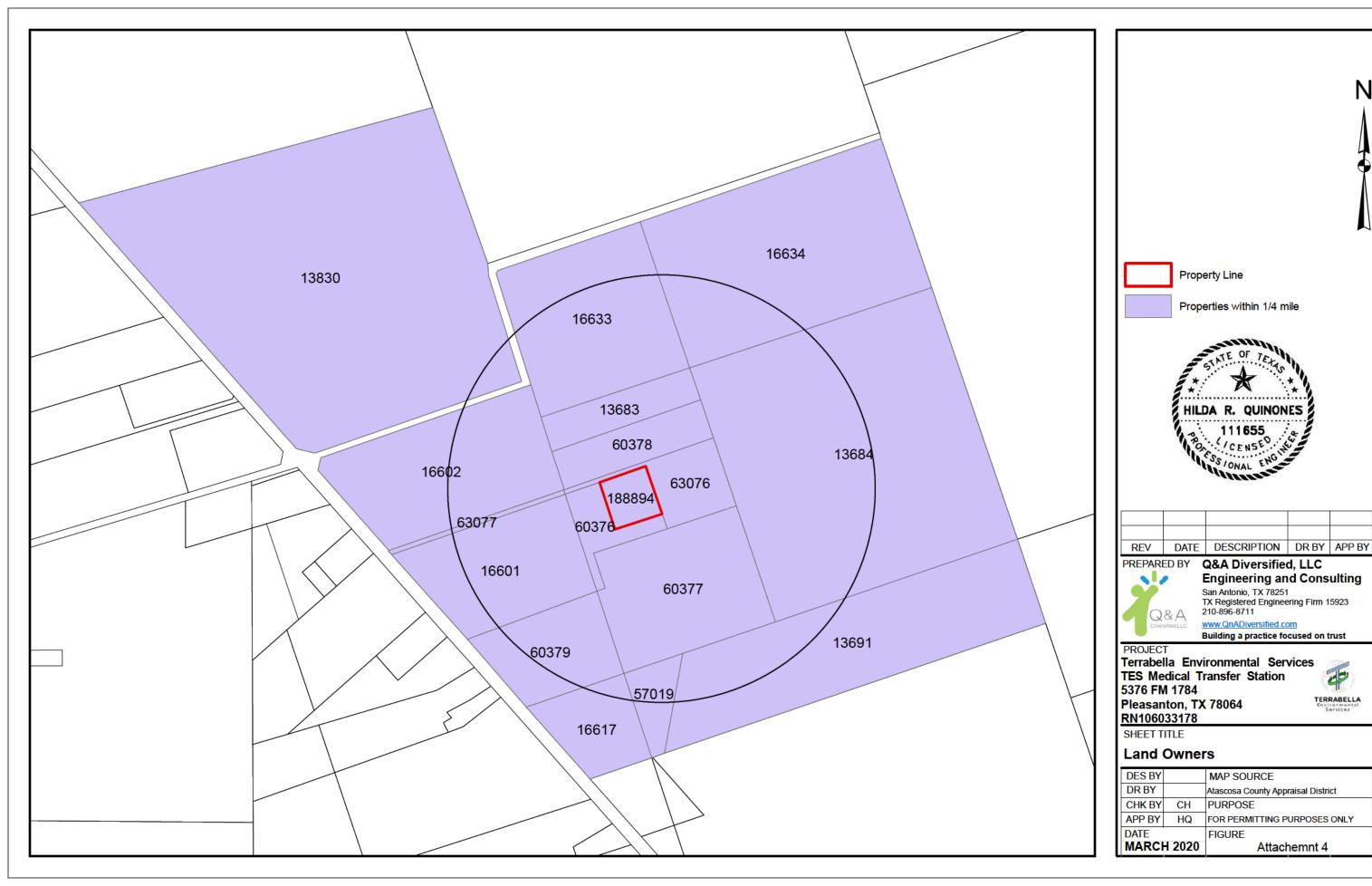




LAND USE MAP



LAND OWNERSHIP MAP



LAND OWNERSHIP LIST

RN106033178 Medical Waste Transfer Facility Initial Application Submittal Date (03/31/2020)

LACKEY ANGIE TRUSTEE PROPERTY NO. 16634 1107 TOKALON SAN ANTONIO TX, 78258 LACKEY ANGIE TRUSTEE PROPERTY NO. 13684 1107 TOKALON SAN ANTONIO TX, 78258

HUIZAR JOE A ETUX AVELINA PROPERTY NO. 13691 4813 FM 1784 PLEASANTON TX, 78064 CARAWAY TAYLOR REED PROPERTY NO. 16633 5415 COUNTY RD 137 FLORESVILLE TX, 78114

CARAWAY LYNN E PROPERTY NO. 13683 5415 COUNTY RD 137 FLORESVILLE TX, 78114 CARAWAY CECIL T JR PROPERTY NO. 60378 6262 E FM 476 PLEASANTON TX, 78064

CAMPBELL AARON THOMAS PROPERTY NO. 63076 5376 FM 1784 PLEASANTON TX, 78064 CAMPBELL GWENDOLYN G PROPERTY NO. 60376 5198 FM 1784 PLEASANTON TX, 78064

CARAWAY ROGER D PROPERTY NO. 60377 5168 FM 1784 PLEASANTON TX, 78064 CONFIDENTIAL PROPERTY NO. 57019 Confidential PLEASANTON TX, 78064

CONFIDENTIAL PROPERTY NO. 16617 Confidential PLEASANTON TX, 78064

CARAWAY ROGER D PROPERTY NO. 60379 5168 FM 1784 PLEASANTON TX, 78064

CAMPBELL GWENDOLYN G PROPERTY NO. 16601 5198 FM 1784 PLEASANTON TX, 78064 CAMPBELL AARON THOMAS PROPERTY NO. 63077 5376 FM 1784 PLEASANTON TX, 78064 RN106033178 Medical Waste Transfer Facility Initial Application Submittal Date (03/31/2020)

CARAWAY CECIL T JR PROPERTY NO. 16602 6262 E FM 476 PLEASANTON TX, 78064

KALISEK FARMS INC PROPERTY NO. 13830 9720 SOUTH PRESA ST SAN ANTONIO TX, 78223

LAND OWNERSHIP HARD COPY AND ELECTRONIC MAILING LIST OR MAILING LABELS

RN106033178 Medical Waste Transfer Facility Initial Application Submittal Date (03/31/2020)

LACKEY ANGIE TRUSTEE PROPERTY NO. 16634 1107 TOKALON SAN ANTONIO TX, 78258 LACKEY ANGIE TRUSTEE PROPERTY NO. 13684 1107 TOKALON SAN ANTONIO TX, 78258

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METES AND BOUNDS DRAWING AND DESCRIPTION

NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OR ALL OF THE FOLLOWING INFORMATION FROM ANY INSTRUMENT THAT TRANSFERS AN INTEREST IN REAL PROPERTY BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.

GWENDOLYN G. CALLAHAN

TO

AARON THOMAS CAMPBELL

GIFT DEED

I, GWENDOLYN G. CALLAHAN, formerly known as GWENDOLYN GAYLE CAMPBELL of Atascosa County, Texas, for and in consideration of the love and affection which I bear to my son, the Grantee hereinafter named, the receipt and adequacy of which is hereby acknowledged and confessed, and for which no other consideration, either express or implied, is herein given;

Have GIVEN, GRANTED, and CONVEYED, and by these presents do GIVE, GRANT, and CONVEY unto AARON THOMAS CAMPBELL of Atascosa County, Texas (as his sole and separate property), whose mailing address is 5376 F. M. Highway 1784, Pleasanton, Texas 78064, all of the following piece, parcel or tract of land lying and being situated in Atascosa County, Texas, subject to the items and reservations described below, said tract of land being more particularly described as follows:

All that certain 2.28 acre tract of land situated about 13.6 miles N 34° E of Jourdanton in Atascosa County, Texas, out of Survey No. 1085, Abstract No. 505, Mary Jordan, original grantee, and being out of a 27.06 acre tract conveyed from Mary Helen Stewart Caraway to Gwendolyn Gayle Campbell by deed dated September 26, 2002, and recorded in Volume 213, Page 324 of the Official Public Records of Atascosa County, Texas, and more particularly described as follows:

BEGINNING: At a 5/8" iron pin set in a Southwest line of a 6.00 acre tract (Volume 281, Page 591, Official Public Records) for the East corner of this tract from which a 5/8" iron pin found in the Southeast line of said 27.06 acre tract for the upper South corner of said 6.00 acre tract bears S 19° 09' 13" E 100.01 feet;

THENCE: S 71° 43' 54" W 315.05 feet to a 5/8" iron pin set for the South corner of this tract:

THENCE: N 18° 16' 06" W 314.78 feet to a 5/8" iron pin set for the west corner of this tract;

THENCE: N 70° 51' 44" E 310.14 feet with the upper Southeast line of said 6.00 acre tract to a 5/8" iron pin found for an interior corner of said 6.00 acre tract and the North corner of this tract;

THENCE: S 19° 09' 14" E 319.53 feet with a Southwest line of said 6.00 acre tract to the POINT OF BEGINNING.

Bearings shown herein are from GPS observations Texas Coordinate System NAD (83).

This conveyance is expressly made and accepted subject to any and all easements, restrictions, leases, or other matters affecting the above described property to the extent that the same are shown by instruments filed of record among the records of the County Clerk of Wilson County, Texas.

TO HAVE AND TO HOLD the above described premises together with all and singular the rights and appurtenances thereto in anywise belonging unto the said Grantee, his heirs and assigns forever, and I do hereby bind myself, my heirs, executors and administrators to WARRANT and FOREVER DEFEND all and singular the said premises unto the said Grantee, his heirs and assigns, against every person whomsoever lawfully claiming or to claim the same or any part thereof.

The above instrument was prepared solely based upon information provided to the scrivener by the parties hereto. No independent title review or title search was done of the above described property.

SIGNED this the _____ day of //// _____, 2015.

GWENDOLYN G. CALLAHAN

formerly known as

GWENDOLYN GAYLE CAMPBELL

STATE OF TEXAS

3

COUNTY OF ATASCOSA

8

This instrument was acknowledged before me on this the ______ day of _______.

2015, by GWENDOLYN G. CALLAHAN, formerly known as GWENDOLYN GAYLE

CAMPBELL.

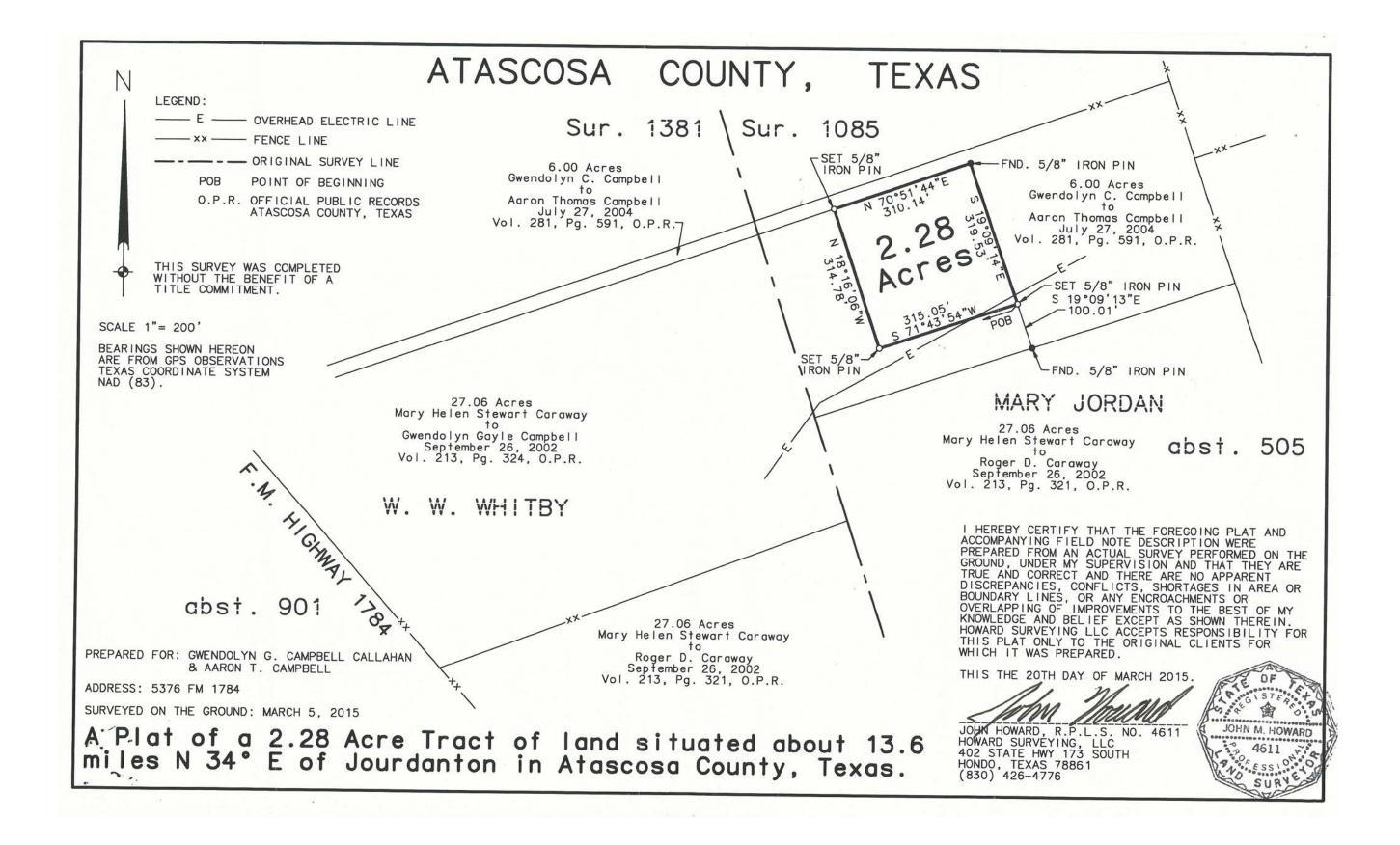
titi/Berger/ Callaban to Campbell

Prepared in the Law Offices of: HOWARD C. BERGER

HOWAYO C. TSYOND

433A West Oaklawn Pleasanton, Texas 78064 Notary Public in and for The State of Texas

After Recording, Return to: AARON THOMAS CAMPBELL 5376 F. M. Highway 1784 Pleasanton, Texas 78064



This agreement, a contract, sets forth the terms as a binding agreement between the Lessee Terrabella Environmental Services Inc. and the leaser Aaron T. Campbell, executed on this day 1st Day of June 2015.

The following terms are set forth:

- The purpose of this contract permits the lessee Terrabella Environmental Services Inc.
 exclusive use of the land owned by leaser Aaron T. Campbell for the purpose of Environmental
 management and services.
- The attached description denotes the land to be utilized in this agreement. The land base consists of 2.28 acres. A map layout of the land is attached to this document.
- The land will be leased at the rate of \$10.00 / Per Year
- 4. The annual contract period shall commence on June 1st of each year.
- All repairs to fence lines be at the expense of the Terrabella Environmental Services Inc.
- 6. Any future improvements to the land will be at the expense of the lessee, any improvements will immediately upon termination of the agreement become the property of the Leaser. If the Lessee for any reason changes ownership of the Company in any way, this agreement will become null and void. A new agreement will have to be reached with the Leaser. No permanent improvements can be made to the land without prior negotiations with the land owner.
- The landowner reserves the right to trespass on the unit so long as there is no disturbance to the operation of the business being conducted.

The above terms has been reviewed and are in mutual agreement between both the

Lessee and the leaser on this date 130×15

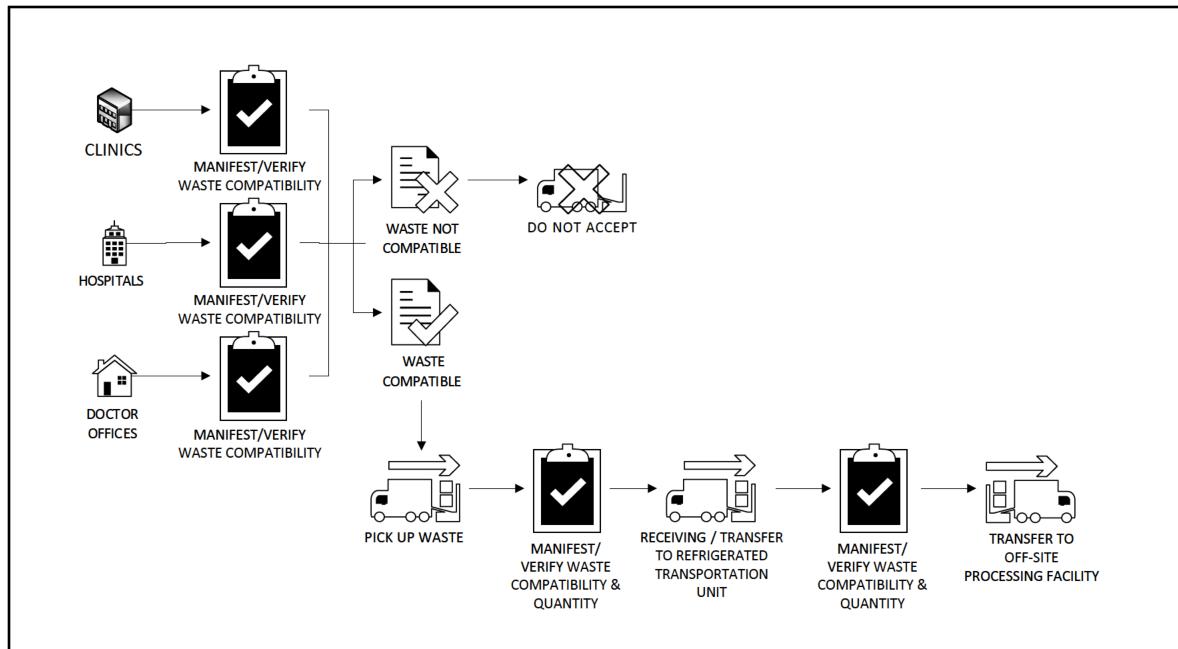
Lessee:

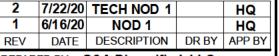
Leaser:

COPY OF AUTHORIZATION TO DISCHARGE WASTEWATER TO A TREATMENT FACILITY

NO PROCESS WATER WILL BE PRODUCED NOT APPLICABLE

PROCESS FLOW DIAGRAMS AND NARRATIVE





PREPARED BY

Q&A Diversified, LLC Engineering and Consulting

San Antonio, TX 78251 TX Registered Engineering Firm 15923 210-896-8711

www.QnADiversified.com

Building a practice focused on trust

PROJECT

Terrabella Environmental Services RN 106033178 5376 FM 1784

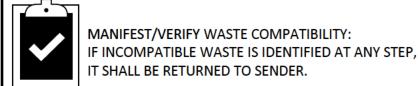
TERRABELLA Environmental Services

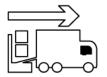
Pleasanton, TX 78064

SHEET TITLE

Process Flow Diagram

DES BY		MAP SOURCE
DR BY		
CHK BY	CH	PURPOSE
APP BY	HQ	FOR PERMITTING PURPOSES ONLY
DATE		FIGURE
APRIL 2020		ATTACHMENT 9 - REV 2





WASTE SHALL REMAIN ON SITE IN LOCKED TRANSPORTATION UNITS FOR A MAXIMUM OF 72 HOURS UNREFRIGERATED, AND 60 DAYS REFRIGERATED.

Attachment 9

Process Flow Diagram Narrative 30 TAC §326.71(h)(4)

This narrative is meant to describe the medical waste cycle from generation to final disposal of the waste as pertinent to the registration application. The narrative is meant to accompany the flow diagram included for better understanding of the process on site.

Untreated medical waste is generated and identified at a heath care facility. Source-separation 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:

- TCEQ 30 TAC §326.19
- DOT 40 CFR §178
- OSHA 29 CFR §1910

The containerized waste shall be collected by a registered transporter and transported to the TCEQ registered medical waste facility for transfer 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 further storage/transfer 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 temporarily store waste in locked transportation units prior to transfer to a treatment/disposal facility. If waste is stored for more than 72 hours, waste will be refrigerated to a temperature of 45 degrees Fahrenheit or less for a maximum of 60 days. Finally, a registered transporter will collect the untreated medical waste for transfer to a TCEQ permitted off-site treatment/disposal facility as defined in §326.3(40) and §326.41(c).

The facility shall meet the definition of the applicable TAC 326.3(56). The facility shall be used for transferring medical waste from collection vehicles to long-haul vehicles (one transportation unit to another transportation unit).

PROCEDURES FOR OPERATION AND TESTING OF TREATMENT EQUIPMENT

THIS SECTION IS NOT APPLICABLE

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

In 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 29 of 55

Page 2

Election Inf	ormation (continued)		L			
J Name and address of each shareholder or former shareholder required to	Shareholders' Consent Statement. Under penalties of perjury, we declare that we conselection of the above-named corporation to be an Stunder section 1362(a) and that we have examined the section 1362(b) and that we have examined the section 1362(b).	Stock owned or percentage of ownership (see instructions)		M Social security number or employer identification number	N Shareholder's tax year ends (month and	
onsent to the election. See the instructions for column K.)	and to the best of our knowledge and belief, it is true complete. We understand our consent is binding an withdrawn after the corporation has made a valid el and date below.)	Number of shares or percentage of ownership	Date(s) acquired	(see instructions)	day)	
	Signature	Date		V-S		
MICHEAL D CARR	y philles		50%	04/23/12		12/31
AARON T	V Day Al Many	1		04/23/12		12/31
PLEASANTON	N WY COURT NOW		50%	-		
PLEASANTON						
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		-	-	-		
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				-	-	
					5.0	

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: 1

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





SAN ANTONIO DISTRICT OFFICE | 4615 NW LOOP 410 | SAN ANTONIO, TX 78229 (210) 615-1110 | WWW.TXDOT.GOV

June 22, 2020

Mr. Cody Seal TCEQ Municipal Solid Waste Permits Section, MC-124 P.O. Box 13087 Austin, TX 78711-3087

RE: Facility Location – 5376 FM 1784, Pleasanton, Texas

Dear Mr. Seal:

TxDOT has reviewed the proposed route for the above referenced facility. We have concluded that the State maintained roadways, IH 37, FM 536, and FM 1784 in Atascosa County, are adequate and have the design capacity to safely accommodate the additional traffic vour registration applications referenced in located vour https://www.qnadiversifed.com/permits.

Based on the information provided in the coordination letter, the facility will utilize the existing driveway on FM 1784. The additional vehicles per day generated by the facility expansion. referenced in the same letter, are minimal and will not require any improvements to FM 1784. Since the facility will be utilizing box trucks and small vacuum trucks, pavement widening improvements recommended for facilities with heavy vehicle ingress/egress will not be necessary.

If you have any questions, please feel free to contact Christen Longoria at (830) 741-6607.

Sincerely,

DocuSigned by:

Mario R. Jorge, P.E.

Mario R. Jorge, P.E.

San Antonio District Engineer

Attachment:

Coordination Letter - June 4, 2020

CC:

Barrlynn West Jr. - Environmental Specialist Christen Longoria, P.E. - Hondo Area Engineer

ENTITY EXERCISING MAINTENANCE RESPONSIBILITY OF PUBLIC ROADWAY

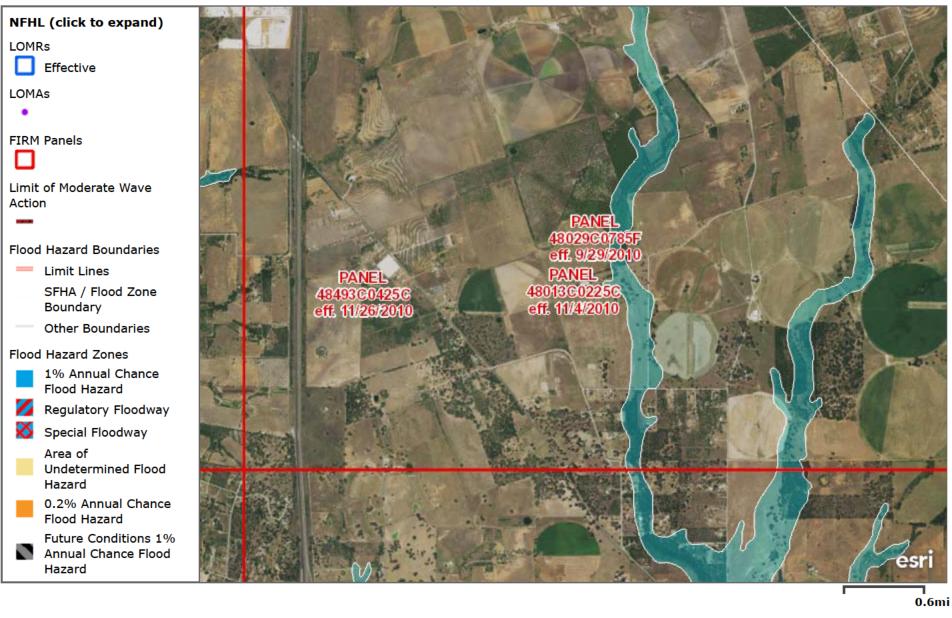
Attachment 14

Entity Exercising Maintenance Responsibility of Public Roadway

Terrabella Environmental Services Inc will maintain responsibility for the roadway leading from the facility to FM 1784. Atascosa County and/or TxDOT is responsible for the maintenance of the nearest public roadway FM 1784.

FEMA MAP

Figure II-2-5: FEMA'S National Flood Hazard Layer (Official)



Data from Flood Insurance Rate Maps (FIRMs) where available digitally. New NFHL FIRMette Print app available: http://tinyurl.com/j4xwp5e

USGS The National Map: Orthoimagery | National Geospatial-Intelligence Agency (NGA); Delta State University; Esri | Print here instead: http://tinyurl.com/j4xwp5e Support: FEMAMapSpecialist@riskmapcds.com | USGS The National Map: Orthoimagery

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

THIS SECTION IS NOT APPLICABLE

WETLAND DOCUMENTATION

THIS SECTION IS NOT APPLICABLE THERE ARE NO WETLANDS ON SITE

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" Rodriguez

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

Re: Type V Registration Application

Terrabella Environmental Services Inc. 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 of a municipal solid waste (MSW) transfer facility. The facility address is 5376 FM 1784, Pleasanton, Atascosa County, Texas 78064. Please refer to the General Location Map available online via http://www.qnadiversified.com/permits. The document title is "Terrabella Medical Waste Transfer Application FM 1784."

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 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





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

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:

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 Medical Waste Registration for the operation of a municipal solid waste (MSW) transfer facility. The facility address is 5376 FM 1784, Pleasanton, Atascosa County, Texas 78064. Please refer to the General Location Map available online via http://www.qnadiversified.com/permits. The document title is "Terrabella Medical Waste Transfer Application FM 1784."

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 TES MSW Transfer facility will be in compliance 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





Victoria Kinnamont <victoria.kinnamont@qnadiversified.com>

Section 106 Submission

1 message

noreply@thc.state.tx.us <noreply@thc.state.tx.us>
To: victoria.kinnamont@qnadiversified.com, reviews@thc.state.tx.us

Mon, Jun 29, 2020 at 10:11 AM



Re: Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas THC Tracking #202013846

Terrabella Environmental Services FM1784 5376 FM 1784 San Antonio,TX 78064

Dear Victoria Kinnamont:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the Executive Director of the Texas Historical Commission (THC), as a courtesy review only and does not suffice for review under Section 106 of the National Historic Preservation Act or the Antiquities Code of Texas.

The review staff, led by Emily Dylla and Caitlin Brashear, has completed its review and has made the following determinations based on the information submitted for review:

Above-Ground Resources

No historic properties are present or affected by the project as proposed. However, if historic properties
are discovered or unanticipated effects on historic properties are found, work should cease in the immediate
area; work can continue where no historic properties are present. Please contact the THC's History Programs
Division at 512-463-5853 to consult on further actions that may be necessary to protect historic properties.

Archeology Comments

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

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

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

Sincerely,

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

Please do not respond to this email.

1 of 1 6/29/2020, 10:12 AM

March 31, 2020

Mark Gillespie
County Commissioner – Precinct 1
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 Registration for the operation of a municipal solid waste (MSW) transfer facility. The facility address is 5376 FM 1784, Pleasanton, Atascosa County, Texas 78064. Please refer to the General Location Map available online via http://www.qnadiversified.com/permits. The document title is "Terrabella Medical Waste Transfer Application FM 1784."

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



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: Genera	l Information
--------------------------	---------------

1. 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)								if issued)			
CN 6043	CN 604334904										
SECTION	II: Cu	stomer Info	<u>ormation</u>								
4. General C	ustomer l	nformation	5. Effective D	ate for Cus	stomer	Inform	atio	n Update	es (mm/dd/yyyy)	6/1/20)20
☐ New Cust☐ Change in		ne (Verifiable wit		date to Cus cretary of St				troller of	Change in Public Accounts)	Regulated E	Entity Ownership
The Custo	mer Nar	ne submitted	here may be	updated	auto	matica	illy	based	on what is cu	rrent and	active with the
Texas Sec	retary o	State (SOS)	or Texas Co	mptroller	of Pu	ıblic A	ccc	ounts (CPA).		
6. Customer	Legal Na	ne (If an individua	l, print last name f	irst: eg: Doe,	John)		<u>l</u> 1	f new Cus	stomer, enter previ	ous Custom	er below:
Terrabella	Enviro	nmental Serv	rices Inc								
7. TX SOS/C	_	Number	8. TX State Ta	_	ts)				I Tax ID (9 digits)		S Number (if
80158614	7		126344597	726			2	263445	972	applicable) (025027696
11. Type of (11. Type of Customer:										
Government:	City	County Federal	State Other		Sole P	roprieto	rship	, -	Other:		
	12. Number of Employees □ 0-20 □ 21-100 □ 101-250 □ 251-500 □ 501 and higher □ 13. Independently Owned and Operated? □ Yes □ No										
14. Custome	r Role (Pr	oposed or Actual) -	as it relates to the	e Regulated	Entity lis	sted on t	his fo	orm. Pleas	se check one of the	following	
☐Owner ☐Occupatio	nal Licens	Operatiee Respo	or nsible Party			Operato y Cleanu		pplicant	Other:		
	PO Bo	x 39									
15. Mailing											
Address:	City	Leming		State	TX	7	ZIP	7805	50	ZIP + 4	0039
16. Country	Mailing In	formation (if outsi	de USA)			17. E-I	Vail	Address	(if applicable)		
						mear	r@	terrabe	llaes.com		
18. Telephor	18. Telephone Number 19. Extension or Code 20. Fax Number (if applicable)							ble)			
(210)89	(210) 892-4496 (210) 892-4497										
SECTION III: Regulated Entity Information											
21. General Regulated Entity Information (If 'New Regulated Entity" is selected below this form should be accompanied by a permit application)											
□ New Regulated Entity □ Update to Regulated Entity Name □ Update to Regulated Entity Information											
The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal						lards (removal					
of organizational endings such as Inc, LP, or LLC).											
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)											
Terrabella Environmental Services											

TCEQ-10400 (03/20) Page 1 of 2

23. Street Address of the Regulated Entity:	5376 F	M 1784								
(No PO Boxes)	City	Pleasanton	State	TX	ZIP	78064	1	ZIP + 4	6394	
24. County	Atasco	sa								
	T	Enter Physical Lo	cation Descrip	tion if no str	eet addres	s is provi	ded.			
25. Description to Physical Location:										
26. Nearest City						State		Nea	rest ZIP Code	
27. Latitude (N) In Deci	mal:	29.079786°		28. L	ongitude	W) In Dec	imal:	-98.4197	29°	
Degrees	Minutes	S	Seconds	Degre	es	N	linutes		Seconds	
29		4	47.2		98		25		11.02	
29. Primary SIC Code (4 digits) 30. Secondary SIC			Code (4 digits)					econdary NAICS Code digits)		
8999	42	212		541620 484			110			
33. What is the Primary			Do not repeat the S							
Providing complet	e progran	ns for hazardo	ous material	s and haza	rdous w	aste mai	nagem	ent.		
34. Mailing	PO Box 39									
Address:	1									
	City	Leming	State	TX	ZIP	78	8050	ZIP + 4		
35. E-Mail Address	s:		1	mcarr(@terrabell	aes.com				
36. Teleph	one Numbe	er	37. Extens	ion or Code		38	Fax Nu	mber (if appl	icable)	
(210)	892-4496						(21	0)892-4497		
P. TCEQ Programs and I				permits/registra	tion number	s that will be	e affected	by the updates	submitted on this	
☐ Dam Safety	☐ Distric	cts	☐ Edwards A	quifer	☐ Emiss	ions Invent	ory Air	☐ Industria	l Hazardous Waste	
Municipal Solid Waste	☐ New Source Review Air ☐ OSSF			Petroleum Storage Tank		PWS				
Sludge	Storm	Water	☐ Title V Air		Tires		Used C			
☐ Voluntary Cleanup	☐ Waste	e Water	☐ Wastewate	r Agriculture	☐ Wate	Rights		Other:		
ECTION IV: Pr	eparer I	nformation		1 %				8		

SECTION V: Authorized Signature

42. Telephone Number 43. Ext./Code

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

44. Fax Number

45. E-Mail Address

hildaq@qnadiversified.com

Company:	Terrabella Environmental Services Inc	Owner/President		
Name (In Print):	Michael D. Carr	Phone:	(210) 892-4496	
Signature:	Mul July		Date:	9APR20

TCEQ-10400 (03/20)

(210) 896-8711

FEE RECEIPT OR COPY OF CHECK

Questions or Comments >>

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Your transaction is complete. Thank you for using TCEQ ePay.

Note: It may take up to 3 working days for this electronic payment to be processed and be reflected in the TCEQ ePay system. Print this receipt and the vouchers for your records. An email receipt has also been sent.

Transaction Information

Trace Number: 582EA000386798

RN106033178 Medical Waste Transfer Facility Initial Application Submittal Date (03/31/2020)

Date: 04/08/2020 12:03 AM

Payment Method: CC - Authorization 0000024458

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.

Voucher	Fee Description	AR Number	Amount
462847	MSW PERMIT/REGISTRATION/AMEND/MOD/TEMP AUTHORIZATIONS APPLICATION FEE		\$100.00
462848	30 TAC 305.53B MWP NOTIFICATION FEE Total fees for transaction:	\$150.00	\$50.00

ePay Again Exit ePay

Note: It may take up to 3 working days for this electronic payment to be processed and be reflected in the TCEQ ePay system. Print this receipt for your records.

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PUBLISHED ZONING MAP

ATASCOSA COUNTY HAS NO ZONING LAWS THIS SECTION IS NOT APPLICABLE

DELEGATION OF SIGNATORY AUTHORITY THIS SECTION IS NOT APPLICABLE

MANUFACTURER SPECIFICATIONS FOR WASTE MANAGEMENT UNITS



UTILITY

The market leading 3000R & FSMA

The Food Safety and Modernization Act (FSMA) is having an effect on how businesses transport food. As the rules state, carriers must provide assurance to shippers that transport vehicles are clean and foods that require refrigeration for safety are transported under "adequate" temperature control.

That's why a refrigerated transport business can look to Utility trailers, and the purchase of the industry-defining 3000R as the first step in surpassing FSMA compliance. Utility thinks beyond

the "adequate" and that is reflected in the quality found in every 3000R. For example, one distinguishing aspect to the interior of a 3000R is its lack of fasteners, which eliminates potential points where moisture can get trapped and where bacteria can grow.

Here are a few ways that the 3000R provides assurance to shippers, receivers and carriers engaged in food transportation operations. In fact, Utility is committed to building trailers that exceed FSMA expectations.





Specifications

Long before food-manufacturing supply chains needed to comply with FSMA rules, Utility Trailer Manufacturing Company engineered trailers that minimized risks of contamination and delivered superior temperature control.



Thermal efficiency

The bonded foam "sandwich" design of Utility's Barrier Door", and unique vinyl gasket seal, reduce weight and helps maintain temperature better than any other door design. The 3000R reduces heat transfer in another critical way too. A low conduction thermal break between threshold and buckplate optimizes thermal efficiency and lowers reefer unit operating costs.



FDA compliant Versitex*-Utility VR2 lining

Utility's high impact lining is found on the complete interior — side walls, front walls, roof, and rear doors of the 3000R. This wards off damage from forklift impact, which reduces maintenance costs and minimizes the risk of heat loss, moisture, and pathogens getting into insulation.



Foam mandrel foam-in-place insulation

A Utility 3000R delivers optimum thermal efficiency. Our unique foam-in-place insulation provides assurance that it will deliver superior temperature control. Only Utility's foam mandrel technology provides 360-degree 100% void-free insulation, and Utility guarantees it. This process also reduces the use of fasteners throughout the trailer, eliminating points of entry to moisture and bacteria.



Watertight Aluminum Floor & Wearband

The easy-to-clean 1½" heavy-duty extruded aluminum duct floor has a 20,000 lb capacity with an integrated 3/16" thick, heavy-duty 10" wearband. In the standard configuration, neither the floor nor the wearband has exposed fasteners to back out or leak moisture into the foam insulation. All seams in both floor and the wearband turn-up are welded full length, creating a water tight barrier. This minimizes the risk of pathogens getting into the trailer superstructure and into refrigerated products.



Best in class cleanability

Less fasteners and Utility's FDA compliant lining, mean less locations for moisture to get trapped. Moisture traps are where pathogens can grow. The extruded aluminum lining corner closures are engineered with capture channels that don't require fasteners. The Utility design ensures best in class cleanability using industry standard practices, helping you achieve FSMA compliance



Optional air return bulkhead

Removable air return bulkhead provides convenient access to refrigeration unit making it easier to clean behind the bulkhead and the unit's coil, a common location for pathogen growth.

		3000R°	MULTI-TEMP
01-03 Dimensions and Deck Type	Gross vehicle weight rating (GV	WR)	
v	65,000 lb	•	~
04 Front Subframe >	Payload capacity		
05 Support Leg and	55,000 lb	~	•
Assembly >	Inside height		
06 Crossmembers and	1041/8"	~	✓
Rails	Inside width		
>	97½" at wearband	•	~
07 Rear Subframe >	Overall length		
08 Suspension, Axles and Actuation	53' 0"	•	•
>	Overall height		
09 Front Wall	13' 6" on 46½" height 5th wheel	•	•
10 Side Wall			
11 Roof >	Overall width 102%"	•	•
12 Rear Case and Doors >	10270	•	
14 Floors >		3000R°	MULTI-TEMP
15 Insulation >	Deck type		
16 Lining >	Straight	~	✓
17 Electrical			
18 Paint and Finish			
19 Miscellaneous >			
20 Tires and Wheels			

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ADDITIONAL STORAGE AND PROCESSING UNIT CLOSURE COST ITEMS

THIS SECTION IS NOT APPLICABLE

CONFIDENTIAL DOCUMENTS

THIS SECTION IS NOT APPLICABLE

SURFACE WATER DRAINAGE CERTIFICATION

Surface Water Drainage Certification 326.71(f)(1)-(3)

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 will prevent the off-site discharge of waste and feedstock material, including, but not limited to, in-process and/or processed materials.

Surface water drainage in and around the facility will be controlled to minimize surface water running onto, into, and off the treatment area.

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.

Property Owner Name: M, chae / O. Ca.	a
Signature:	Date: 07/23/20

PERSONNEL TRAINING PROGRAM

TRAINING PROGRAM

All employees will be instructed in safe operating procedures, regulatory compliance and emergency preparedness.

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.

At orientation and annually in January, employees will also be trained on bloodborne pathogens, needle-stick and OPIM (other potentially infectious materials), US DOT hazardous materials regulations, US EPA RCRA requirements, OSHA GHS, OSHA PPE, and HAZWOPER. Additionally, all employees are tested for HEP-B, HEP-C, and HIV in case of needle stick. These tests are also completed during annual physicals.

Description and Mode of Training

All facility personnel must successfully complete a program of classroom or online instruction and on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance and their safety.

Topics for training include:

- all aspects of the operation of the facility;
- waste acceptance procedures;
- characteristics and appearance of accepted wastes and unauthorized wastes;
- Procedures for the detection and prevention of the receipt of prohibited wastes; including random inspections of packaging for incoming loads and records of all inspections;
- recordkeeping and product labeling;
- prohibited activities;
- proper product transfer methods and procedures; and
- spill response and good housekeeping procedures.

A trained employee will monitor all incoming loads of waste to help prevent the receipt of prohibited waste and to direct the transfer of waste. This training will be performed before an individual is qualified to inspect incoming loads.

At minimum, the training program will ensure that all personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

- procedures for using, inspecting, repairing, and replacing facility emergency equipment;
- response to fires; and
- shutdown of operations.

Safety, Additional Training and Awareness Meetings

Management will conduct regular meetings and refresher courses to review operation and safety procedures and update employees on site specific topics.

