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RAILROAD COMMISSION OF TEXAS

OIL AND GAS DIVISION

May 21, 2010

US LIQUIDS OF LA, L.P.
411 SAM HOUSTON PKWY E STE 400
HOUSTON TX 77060

Re: Financial Security (Rule 78)
South Texas Disposal Facility
Zapata County, Texas
Permit No. STF-006

We are in receipt of your financial security in the amount of \$1,471,734.00 for the above-referenced facility. The approved closure cost estimate submitted, dated April 17, 2008, is for the amount of \$1,514,532.00. The remaining \$42,798.00 must be submitted and approved prior to use of the eastern portion of the rainwater collection pond for the storage of contact rainwater (as referenced in Permit Condition VII.A.4.b.).

Within 30 days of the date of this letter, an appropriate financial security instrument should be sent to my attention at the following address: Railroad Commission of Texas, P.O. Box 12967, Austin, Texas, 78711-2967.

Please contact me at (512) 463-6797 should you have any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jill Hybner".

Jill Hybner, Manager
Environmental Permits & Support
Technical Permitting

JMH/mg

cc: RRC – Corpus Christi/ 04



RAILROAD COMMISSION OF TEXAS

PERMIT TO RECEIVE, STORE, HANDLE, TREAT AND DISPOSE OF CERTAIN NONHAZARDOUS OIL AND GAS WASTES

Stationary Treatment Facility Permit,
STF Permit No. 006
Amended & Renewed, Supersedes Permit
dated May 1, 2003

US LIQUIDS OF LA, L.P.
411 SAM HOUSTON PKWY E STE 400
HOUSTON TX 77060

Based on information contained in the original application dated March 21, 1991, subsequent information submitted June 18, 1991, and July 10, 1991, the amendment requests dated July 6, 1993, September 27, 1993, November 17, 1993, November 21, 1994, December 14, 1994, July 19, 1995, July 20, 1995, November 18, 1997, and May 30, 2000, and your renewal and amendment request dated April 22, 2008, and subsequent information received, you are hereby authorized to receive, store, handle, treat, dispose of, and recycle certain non-hazardous oil and gas wastes as specified below at the following facility:

South Texas Disposal Facility
120-Acres
Share 3, Tract "A" of the L. L. Haynes Partition
Las Comitas Grant, A-559
Zapata County, Texas
RRC District 04

Authority is granted to receive, store, handle, treat, and dispose of certain non-hazardous oil and gas wastes in accordance with Statewide Rule 8 and to recycle waste in accordance with 16 TAC Chapter 4, Subchapter B, subject to the following minimum conditions:

I. GENERAL PERMIT CONDITIONS:

- A. The construction of any cell or subcell may not begin until financial security covering closure of that cell or subcell has been provided to and approved by the Commission, in accordance with Rule 78. Financial security currently covers

landtreatment cells 1, 2, 3, 4, 5, 6 and 7, and landfill cells 1 and 4 (subcells 1A, 1B, 1C, 4A, 4B and 4C).

- B. The effective date of this permit is May 21, 2010.
- C. The authority granted by this permit expires on May 20, 2015
- D. This permit may be considered for administrative renewal upon review by the Commission.
- E. The permittee shall submit a Semiannual Report containing the applicable information required in Condition II.B.7, V.D.5, VI.D.4, VIII.B.4.b, VIII.C.8, VIII.F.3, VIII.F.4, and IX.E, of this permit.

The Semiannual Report shall cover the 6-month period from January 1 through June 30 and July 1 through December 31 of each year.

The Semiannual Reports shall be submitted to Technical Permitting in Austin no later than the 31st day of the month following each reporting period, or each January 31 and each July 31, respectively, through the end of the Post-Closure monitoring period.

- F. This permit is not transferable without the consent of the Commission. Any request for transfer of this permit must be filed with Technical Permitting in Austin at least 60 days before the permittee wishes the transfer to take place.
- G. This permit does not authorize the discharge of any oil or gas waste from the facility.
- H. No oil and gas NORM (Naturally Occurring Radioactive Material) waste as defined in 16 TAC §4.603 or waste from a facility that is licensed by the Texas Department of State Health Services to process or treat oil and gas NORM waste may be received at this facility.
- I. The permittee shall make all records available for review and/or copying during normal business hours upon request of Commission personnel.
- J. Failure to comply with any provision of this permit shall be cause for modification, suspension or termination of this permit. This permit may be canceled if Technical Permitting determines that the facility is in violation of the conditions of this permit or if operation of the facility is causing or allowing pollution of surface or subsurface water.

II. INCOMING WASTES:

A. AUTHORIZED WASTES:

Only non-hazardous wastes subject to the jurisdiction of the Railroad Commission of Texas may be received or disposed of at the facility. You may receive, store, handle, treat, and dispose of only the following oil and gas wastes, including those wastes generated in Mexico:

non-injectable, water base drilling fluid and the associated cuttings; non-reclaimable oil base drilling fluids and the associated cuttings; non-reclaimable, non-hazardous tank bottoms from gas plants, crude oil reclamation plants and crude oil production/separation facilities; non-injectable, non-hazardous waste material from produced water collecting pits; produced formation sand; soil contaminated with produced water or crude oil; solid wastes from gas dehydration and sweetening, such as spent glycol and amine filters, solid filter media, molecular sieves, and precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber sludge; iron sulfide; spent activated carbon and other filtering and separation media; liners from pits that contained exempt oil and gas wastes; inert wastes as defined by Statewide Rule 8 such as uncontaminated concrete or wood; and other non-hazardous oil and gas waste generated in connection with the exploration, development and production of oil and gas resources.

No waste may be received or disposed of at the facility if it is not a waste under the jurisdiction of the Railroad Commission of Texas or it is a listed hazardous waste or it exhibits one or more hazardous waste characteristics.

No asbestos-containing material may be accepted for disposal at the facility.

No wastes, such as metal, glass, or oil, may be disposed of at the facility if that material is recyclable or reclaimable.

B. TESTING/RECORDKEEPING REQUIREMENTS FOR INCOMING WASTES:

1. All incoming wastes shall be pre-characterized, profiled and/or tested in accordance with the procedures outlined in the "Facility Waste Acceptance Plan" dated May 29, 2000, incorporating the revised Table 1 dated October 5, 2000, which is attached to and incorporated as part of this permit as **Permit Appendix B**. Each load of incoming waste, other than water base drilling fluid and the associated cuttings or oil base drilling fluid and the associated cuttings, must be scanned for the presence of naturally occurring radioactive material (NORM) using a scintillation meter with a sodium iodide detector. Any load with a maximum reading of 50 microrentgens per hour or more may not be unloaded or processed at the facility unless further analysis of the waste demonstrates that the waste does not exceed 30

picocuries per gram Radium- 226 or Radium-228 or 150 picocuries per gram of any other radionuclide. The method used to determine NORM concentration in picocuries per gram must be submitted to and approved by Technical Permitting prior to use for purposes of this permit.

2. Prior to receipt at the site, waste from commercial oil and gas facilities and reclamation plants must be analyzed and may not exceed the limit on the following parameter:

<u>PARAMETER</u>	<u>LIMITATION</u>
TOX (Total Organic Halides)	100 mg/kg

Special authorization for disposal of waste with a TOX >100 mg/kg may be considered. Authority must be obtained from Technical Permitting in Austin.

3. Representative samples of incoming RCRA non-exempt waste must be analyzed for the following parameters and may not exceed the following limitations:

<u>PARAMETER</u>	<u>LIMITATION (TCLP)</u>
Metals	
Arsenic (As)	< 5.0 mg/1
Barium (Ba)	< 100.0 mg/1
Cadmium (Cd)	< 1.0 mg/1
Chromium (Cr)	< 5.0 mg/1
Lead (Pb)	< 5.0 mg/1
Mercury (Hg)	< 0.2 mg/1
Selenium (Se)	< 1.0 mg/1
Silver (Ag)	< 5.0 mg/1
Benzene	< 0.5 mg/1

4. Prior to receipt of any waste from Mexico at the site, a representative sample of each waste shipment from each site must be analyzed for the following parameters and may not exceed the following limitations:

<u>PARAMETER</u>	<u>LIMITATION</u>
TOX	100 mg/kg
Corrosivity	pH 6 - 10
Reactivity	No materials exhibiting the characteristic of reactivity as defined by RCRA

III. GENERAL FACILITY DESIGN:

- A. The general layout and arrangement of the facility shall be consistent with the "Facility Site Plan", dated April 8, 2008, which is attached to and incorporated as part of this permit as **Permit Appendix A-Amended dated April 8, 2008**.
- B. A minimum 50-foot buffer zone shall be maintained between the boundaries of the property and any treatment or disposal area.
- C. A perimeter dike with a minimum height of four (4) feet shall surround the facility. The dike must be keyed into the natural clay soils, and must be constructed and maintained to ensure the integrity of the dike system and its ability to prevent storm-water run-off from exiting the facility.
- D. Dikes shall be placed around all waste and chemical storage areas. Dikes shall be constructed and maintained to adequately serve their intended purpose, i.e. control storm-water run-on and run-off; contain a tank's maximum capacity plus twelve (12) inches of freeboard; divert or channel storm-water flow, etc.
- E. CONTAMINATED RAINWATER/LEACHATE STORAGE AREA: Four (4) above-ground fiberglass or steel storage tanks with 210 to 500 barrel capacity shall be installed to store contaminated rainwater and leachate prior to disposal.
- F. SECURITY: The facility shall have security to prevent unauthorized access. The entire facility shall be surrounded by a game-proof fence. Access shall be secured by a locked gate when the facility is unattended and by a security guard when attended. Only employees of the permittee may have a key to the lock.
- G. The general layout and arrangement of the commercial recycling facility shall be consistent with the "Commercial Recycling Facility Plan View", dated April 8, 2008, which is attached to and incorporated as part of this permit as **Permit Appendix C**.

IV. STABILIZATION BASINS:

- A. Construction
 - 1. The facility shall include two stabilization basins. Each stabilization basin shall be constructed of steel and have approximate dimensions of 40' x 9' x 5' high. The basins shall be located to the south of Cell 5, designated as T3 and T4 on **Permit Appendix A – Amended** dated April 8, 2008.
 - 2. An earthen ramp shall be constructed to provide truck access to the top of the basins.

B. Operation

1. Incoming wastes that contain over 3000 mg/l of chlorides shall be placed in the stabilization basins and allowed to dry for a period not exceeding one week.
2. After the drying period, native soil shall be added to the stabilization basins and mixed with the high chloride wastes. The wastes will be successfully treated when it passes the Paint Filter Test (EPA Method 9095), has a TPH of 5% or less, and has a chloride concentration of 9000 ppm or less (dry weight basis).
3. Successfully treated waste shall be removed from the stabilization basins and placed in a landfill cell.

C. Any spills of waste or any other materials shall be promptly cleaned up and processed through the treatment cycle or disposed of in an authorized manner.

V. LANDTREATMENT AREA:

A. CONSTRUCTION OF LANDTREATMENT AREA:

1. The landtreatment area shall be constructed in a rotating plot configuration consisting of seven (7) cells, each 2.5 to 3.5 acres, for a total of 18.5 acres. These plots shall be arranged and numbered as indicated on the facility diagram, **Permit Appendix A-Amended dated April 8, 2008.**
2. A perimeter levee shall be constructed to surround the entire landtreatment area. This levee shall be keyed into the underlying soil and shall be constructed to a minimum height of three (3) feet and a minimum width at base of nine (9) feet.
3. The landtreatment cells shall be separated using levees to partition waste in the individual cells. These levees shall be constructed and maintained to a minimum height of one (1) foot and width at base of at least three (3) feet.
4. The treatment cells shall be designed with a slope of between 0.75 and 1.5 percent to direct runoff from the landtreatment plots to facilitate removal of rainwater.
5. Run-on shall be controlled and diverted around the landtreatment plots.
6. An off-load ramp shall be constructed for each treatment cell.

B. AUTHORIZED WASTES FOR LANDTREATMENT AREA:

1. The following wastes are authorized for treatment in the landtreatment cells provided the chloride concentration is 3000 mg/l or less:

Non-reclaimable oil base mud and associated cuttings, water base drilling fluids and associated cuttings, tank bottoms, washwater from the washout of vacuum trucks and other waste streams suitable for landtreatment as authorized by Condition II.A and meet the testing requirements of Condition II.B.

C. LANDTREATMENT AREA OPERATION

1. A freeboard of at least one (1) foot must be maintained between the level of the waste in the treatment cells and the top of the cell levees and at least two (2) feet from the top of the perimeter levee at all times.
2. The waste will be successfully treated when it passes the Paint Filter Test (EPA Method 9095) and has a TPH of 5% or less.
3. Successfully treated waste material may be removed from the treatment cells for disposal in a landfill cell.

D. LANDTREATMENT AREA MONITORING

1. For the purposes of monitoring and sampling the soils in the landtreatment cells, the following definitions will be employed:

SOIL CORE SAMPLING DEPTHS -- TREATMENT ZONES

Name	Zone Depth	Sampling Depth
Waste Treatment Zone (Includes applied waste)	Above grade residual to 12"	Above grade to 12" below cell surface
Upper Treatment Zone	12" to 60"	48" to 60"
Lower Treatment Zone	60" to subsoil clay	12" above subsoil clay
Compliance Monitoring	top 12" of subsoil clay	top 12" of subsoil clay

2. Four (4) randomly selected core samples from each treatment cell shall be collected using standard approved sampling and collection procedures.

These samples shall be composited into one soil sample for each Treatment Zone.

3. Soil sampling shall be performed as follows:

<u>Sampling Frequency</u>	<u>Zone</u>	<u>Parameters to be analyzed</u>
Once for baseline prior to waste application		pH, EC (Saturated paste), CEC, TOC, SAR, TPH (Carbon range up to C40+), soluble anions and cations, Ag, As, Ba, Cd, Cr, Cu, Fe, Mg, Mn, Ni, Pb, Hg, Se, Zn
Quarterly	WTZ UTZ	pH, EC (Saturated Paste), SAR, TPH Carbon range up to C40+), Cl, Na
Prior to waste removal	WTZ	Cl, TPH (Carbon range up to C40+)
Semi-annual	WTZ, UTZ, LTZ, CMZ	pH, EC (Saturated Paste), SAR, TPH (Carbon Range up to C40+), Ba, soluble anions and cations, Cr, Ni, Pb, Zn

4. The Corpus Christi District Office shall be notified at least 48 hours prior to any sampling event.
5. A semi-annual data interpretation and summary shall be submitted to Technical Permitting in Austin and the Corpus Christi District Office as part of the Semiannual Report required by Condition No. I.E. of this permit.

E. CLOSURE OF LANDTREATMENT AREA:

1. Prior to commencing closure of a landtreatment cell, representative samples shall be obtained from the cell and analyzed. The following constituent levels shall not be exceeded:

<u>PARAMETER</u>	<u>PRE-CLOSURE LIMIT</u>
TPH (weight %)	Less than 1
Chlorides (mg/l)	2500 or background

Metals (mg/kg maximum):	
Arsenic	300
Barium	2000
Beryllium	50
Cadmium	3
Chromium	1000
Cobalt	200
Copper	250
Metals (mg/kg maximum):	
Lead	1000
Manganese	1000
Mercury	40
Molybdenum	5000
Nickel	100
Selenium	5
Vanadium	500
Zinc	1000

2. Any soil determined to exceed the prescribed limits in this permit must be removed and disposed of in a landfill cell.
3. When acceptable soil constituent levels have been verified, a two (2) foot clay cap shall be placed over the landtreatment cell in accordance with cap construction techniques described in permit application Section IV.D. The cap shall be sloped in the direction of the rainwater collection pond, with a maximum slope of 2.9 percent. Eighteen (18) inches of topsoil shall then be placed, contoured, and seeded with appropriate vegetation.

VI. LANDFILL AREA:

A. CONSTRUCTION OF LANDFILL AREA:

1. The landfill area shall consist of four (4) cells, with each cell divided into 3 to 4 subcells, for a total disposal capacity of approximately 1,979,200 cubic yards for cells 1, 2 and 4 (subcells 1A, 1B, 1C, 2A, 2B, 2C, 3A, 3B, and 3C) and 2,154,750 cubic yards for cell 3R.
2. Each of the four (4) cells shall be constructed using the continuous method of development: development of a large cell by systematically excavating, lining, and filling individual subcells in sequential order.
3. Each sub-cell shall be constructed with a re-compacted clay liner across the bottom of the cells and the side-walls with a minimum thickness of three (3) feet. The clay liner shall be installed and compacted in eight (8) inch lifts to a dry density of at least 95% of the maximum dry density until the required

three (3) feet has been installed. A soil liner evaluation report (SLER) shall be submitted to Technical Permitting in Austin upon completion of each landfill sub-cell. This SLER shall provide information that a minimum coefficient of permeability of 1.0×10^{-7} cm/sec or less has been obtained. The clay liner must be overlain by a high-density polyethylene liner with a thickness of at least 60 mils.

4. Interior toe dikes must be constructed to a minimum of one and a half (1 ½) feet in height around the perimeter of each active cell to prevent run-off of storm-water into the cell.
5. A leachate collection and removal system shall be installed in each of the disposal cells.
6. The top liner must have a slope of one percent (1%) both laterally and longitudinally to draw the liquids to the centrally located leachate collection system.
7. Cells 2 and 3 shall be lined with a 3-foot thick compacted clay secondary liner and a 60-mil HDPE primary liner, or alternatively with a 60-mil HDPE secondary liner and a 60-mil HDPE primary liner. If the permittee constructs cells 2 or 3, or subcells of these cells with HDPE secondary liners, then a geonet drainage layer must be placed between the HDPE primary and secondary liners to detect leaks in the primary liner.
8. The liners and leak detection systems must be installed in accordance with the liner manufacturer's specifications and sound engineering practices.
9. An alternative geomembrane liner material may be substituted for 60-mil HDPE upon prior approval of the material by Technical Permitting in Austin.
10. Disposal cells 2 and 3, or subcells of these cells may be constructed with the base of the excavation at an alternative grade level above the standard grade level (i.e., the alternative depth of excavation is less deep than the standard level), as shown in the amendment application dated April 22, 2008, provided updated soil balance calculations, showing a net soil surplus for the facility closure at the time of cell construction, are submitted to and approved by Technical Permitting. The soil balance calculations must be submitted under seal of a professional engineer registered in Texas.

B. AUTHORIZED WASTES FOR LANDFILL AREA:

Only solid wastes listed in Condition No. II.A of this permit that pass the Paint Filter Test (EPA Method 9095), have a TPH of 5% or less, and has a chloride

concentration of 9000 ppm or less (dry weight basis), and inert wastes as defined by Rule 8 may be disposed of in the landfill cells.

C. OPERATION OF LANDFILL AREA:

1. Waste placed in each landfill cell shall be compacted on a daily basis. Intermediate cover shall be placed on a weekly basis during periods when wastes are added to the landfill.
2. Non-recyclable containers, such as old fiberglass storage tanks, must be crushed or cut-up into small pieces to eliminate potential voids in the landfill cells.

D. MONITORING OF LANDFILL AREA:

1. The leak detection systems for all cells shall be monitored weekly for the presence of liquids.
2. Any leachate collected shall be sampled and analyzed for pH, TPH, and chlorides. Leachate shall be stored until the analysis is complete and then managed appropriately (*i.e.*, leachate with 3000 mg/l chlorides or less may be applied to a landtreatment cell or disposed in a permitted injection well; leachate with greater than 3000 mg/l chlorides may be treated in a stabilization basin or disposed in a permitted injection well.)
3. The permittee must maintain and keep a record of when the leak detection systems are monitored and the results of each monitoring event. This record must be maintained by the permittee for the life of each cell.
4. Results of leak detection system monitoring shall be submitted to Technical Permitting in Austin and to the Corpus Christi District Office as part of the Semiannual Report required in Condition I.E. of this permit.
5. Technical Permitting in Austin and the Corpus Christi District Office must be notified within 24 hours if the leak detection system indicates liner failure.
6. If the leak detection system indicates liner failure, disposal into the cell must cease immediately and the liner must be inspected for deterioration and leaks within five (5) days. The liner must be repaired before use of the cell may resume.
7. The maximum level of waste allowed in each landfill cell shall not exceed 40 feet above grade and shall be in conformance with the lines and grades shown in the amendment application dated April 22, 2008.

E. CLOSURE OF LANDFILL CELLS:

1. When the level of waste in a cell reaches the maximum allowable level specified in Condition VI.D.7, closure of the cell shall commence.
2. Four (4) feet of clay-rich material shall be placed over the waste. The outer edges of the cap shall be keyed into the perimeter dikes. The clay cap shall be installed and compacted in eight (8) inch lifts to a dry density of at least 95% of the maximum dry density until the required four (4) feet has been installed.
3. Eighteen inches of topsoil shall be placed over the clay cap and vegetated.

VII. RAINWATER COLLECTION AREA:

A. CONSTRUCTION OF RAINWATER COLLECTION POND:

1. A ten-acre rainwater collection pond shall be constructed within the confines of the perimeter dikes to contain rainwater runoff from the site.
2. The collection pond shall be lined on the bottom and sides with a minimum of one (1) foot of re-compacted clay.
3. At least one (1) foot of freeboard must be maintained between the level of the rainwater in the pond and the top of the collecting pond dikes.
4. The permittee may construct the eastern portion of the rainwater collection pond for the storage of contact rainwater collected from the landtreatment cells, as described in the permit application dated April 22, 2008, provided:
 - a. The contact rainwater collected from the landtreatment cells contains less than 3,000 mg/l chlorides and no phase-separated hydrocarbons.
 - b. Financial security must be submitted to and approved by Technical Permitting in Austin prior to use of the eastern portion of the rainwater collection for the storage of contact rainwater.
 - c. Technical Permitting in Austin and the Corpus Christi District Office are notified at least 30 days prior to beginning construction.
 - d. The Corpus Christi District Office must inspect the facility and verify the eastern portion of the rainwater pond has been constructed in accordance with the permit amendment application dated April 8, 2008.

B. OPERATION OF RAINWATER COLLECTION AREA:

1. Rainwater shall be disposed of by one of the following methods:
 - a. spray irrigated on the Landtreatment Area provided it contains less than 3,000 mg/l chlorides; or
 - b. disposed of in an authorized injection well; or
 - c. allowed to evaporate

VIII. COMMERCIAL RECYCLING AREA– ROADBASE PROCESS

A. GENERAL DESIGN OF COMMERCIAL RECYCLING AREA:

1. The roadbase process shall be maintained within the confines of Cell 7, including associated process equipment, storage equipment, and ingredients. The only exception shall be inert materials, which may be stored outside the cell.
2. The general layout and arrangement of the roadbase process shall be consistent with the diagram labeled “Commercial Recycling Facility Plan View,” which is attached to and incorporated as part of this permit as **Permit Appendix C**. The commercial recycling facility shall include all the components (i.e., pugmill, pozzolon silo, feed bins, conveyors, emulsified asphalt tank, etc.) and storage areas (i.e., untreated waste, inert material/coarse aggregate, and partially treated waste/recycled product) shown in **Permit Appendix C**, but the actual as-built location of each component and storage area within Cell 7 may differ slightly from the Commercial Recycling Facility diagram.
3. Berms for Cell 7 shall be constructed and maintained in accordance with Permit Condition V.A.2 and V.A.3.
4. Any chemical used in the treatment process shall be stored in vessels designed for the safe storage of the particular chemical and these vessels shall be maintained in a leak free condition.

B. AUTHORIZED WASTES FOR COMMERCIAL RECYCLING AREA:

1. Only oil and gas waste solids authorized by Permit Condition No. II.A. may be treated for reuse as roadbase.
2. Any oil and gas waste solids intended for reuse as roadbase must meet the requirements of Permit Condition Nos. II.B. and V.C.2.
3. Inert materials including, but not limited to, caliche, gravel, non-hazardous concrete rubble, brick, cinder block and rock may be stored at the facility and used as necessary for the manufacturing of roadbase at the facility.

4. STABILIZATION MATERIAL TESTING REQUIREMENTS

- a. Prior to receipt at the facility, representative samples of incoming cement kiln dust (CKD) must be analyzed by the supplier for the following parameters and may not exceed the following levels:

<u>PARAMETER</u>	<u>LIMITATION</u>
Metals:	TCLP
Arsenic	< 5.0 mg/l
Barium	< 100.0 mg/l
Cadmium	< 1.0 mg/l
Chromium	< 5.0 mg/l
Lead	< 5.0 mg/l
Mercury	< 0.2 mg/l
Selenium	< 1.0 mg/l
Silver	< 5.0 mg/l

- b. The permittee shall maintain records documenting the source of each shipment of cement kiln dust received at the facility for a period of three (3) years from the date of receipt. These records shall include copies of lab analyses demonstrating compliance with Condition No. VIII.D.4.a. Copies of these records shall be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition I.E. of this permit.
- c. The permittee must submit a proposal for the use of any additional cementitious material in the treatment of waste at the facility to Technical Permitting in Austin. Use of the additional cementitious material is contingent upon Commission approval.

C. CONSTRUCTION OF COMMERCIAL RECYCLING AREA:

1. Untreated waste shall be staged within Cell 7, as generally shown on the recycling facility plan view, **Permit Appendix C**.
2. The 6,000-gallon emulsified asphalt tank shall be surrounded by compacted earthen berms and positioned within Cell 7, as generally shown on the recycling facility plan view, **Permit Appendix C**. Any spilled asphalt and asphalt-affected soil must be removed and immediately processed through the pugmill.
3. The pug mill and associated feed bins, pozzolon silo, conveyors, and ancillary processing equipment shall be located within Cell 7, as generally shown on the recycling facility plan view, **Permit Appendix C**.

4. Partially treated waste shall be staged in 800-ton lots within Cell 7 as shown on the recycling facility plan view, **Permit Appendix C**.
5. Recyclable product shall be staged in 800-ton lots within Cell 7 as shown on the recycling facility plan view, **Permit Appendix C**.
6. No permanent tanks shall be kept within Cell 7 without authorization. Leased tanks may be used in the production of recycled product.
7. The combined volume of untreated waste, partially treated waste, and recycled product at the roadbase facility shall not exceed 5,000 yards, or 10,000 tons, at any given time.
8. Records shall be maintained on site showing the combined tons and cubic yards of untreated waste, partially treated waste, and recycled product maintained within Cell 7. The records shall be updated at least once per week, and shall include documentation for density conversion (ton to cubic yard) for each waste type.

Copies of the records must be submitted as part of the Semiannual Report required in Condition I.E. of this permit.

D. OPERATION OF COMMERCIAL RECYCLING AREA:

1. The general recycling process shall be consistent with the "Roadbase Process Flow", dated April 10, 2008, which is attached to and incorporated as part of this permit as **Permit Appendix D**.
2. Material Safety Data Sheets must be submitted to the Austin Office for any chemical proposed to be used in the roadbase process. Use of the chemical is contingent upon Commission approval.
3. Any soil, media, or other debris contaminated by a spill of waste or any other materials shall be promptly cleaned up and processed through the treatment cycle or disposed of in an authorized manner.
4. Any leased tanks entering the facility must be free of leaks and must be maintained in a leak-free condition while on the premises.
5. Excess rainwater collected within the bermed area of Cell 7 or within the bermed area of the emulsified asphalt tank shall be removed and disposed of in an authorized manner or reused in the recycling process.

6. Waste shall be processed through the pug mill system with appropriate amounts of emulsified asphalt, inert aggregate, and additional pozzolon ingredient as needed, so that the partially treated waste meets the limitations in Condition VIII.E.2. of this permit.
7. To maintain adequate segregation of partially treated waste until laboratory results are received and demonstrate that the partially treated waste meets permit specifications for use as roadbase, the partially treated waste shall be stored within Cell 7 as follows:

Partially treated waste and/or recyclable product shall be placed in lots of 800 tons each.

Each lot shall be labeled with a sign that includes a unique lot identification number that corresponds to the lot's laboratory analyses report number. Signage shall be color-coded as follows:
 - a. Untreated waste shall be labeled with a red sign;
 - b. Partially treated waste shall be labeled with a yellow sign;
 - c. Recyclable product shall be labeled with a green sign.
8. Appropriate measures shall be taken to control dust at all times.

E. PROCESS CONTROL OF COMMERCIAL RECYCLING AREA:

1. Bench scale tests shall be performed as needed to determine optimum mixing design.
2. A sample of the partially treated waste shall be tested for the parameters listed below for every 800 tons of waste produced. The 800-ton lot sample shall be composed of a composite of four (4) sub-samples obtained at 200-ton intervals. Each 800 ton lot sample shall be analyzed for the following parameters:

<u>PARAMETER</u>	<u>LIMITATION</u>
Minimum Compressive Strength by Method Tex-117-E	35 psi

<u>PARAMETER</u>	<u>LIMITATION</u>
SPLP by EPA Method 1312 Metals	

Arsenic	<5.00 mg/l
Barium	<100.00 mg/l
Cadmium	<1.00 mg/l
Chromium	<5.00 mg/l
Lead	<5.00 mg/l
Mercury	<0.20 mg/l
Selenium	<1.00 mg/l
Silver	<5.00 mg/l
Benzene	<0.50 mg/l

1:4 Solid: Solution 7 Day Leachate Test (LA 29-B Method)

Chlorides	<700.00
TPH	<100.00
pH (Standard Units)	6 – 12.49

3. Any partially treated waste not meeting the limitations in Condition VIII.E.2. shall be returned to the mixing cycle and reprocessed or disposed of in an authorized manner.

F. FINAL DISPOSITION OF RECYCLED ROADBASE MATERIAL:

1. Partially treated waste meeting or exceeding process control parameters listed in Condition VIII.E.2. is suitable for use as roadbase material and may be used as roadbase.
2. The following records shall be kept at the facility for a period of three (3) years from the date of removal for each load of recyclable product:
 - a. the date the recyclable product is removed from the facility;
 - b. the volume of recyclable product removed from the facility;
 - c. the identification of the recipient; and
 - d. documentation indicating the approximate location where recyclable product is used.
3. Copies of analyses demonstrating that processed material has met the limitations in Condition No. VIII.E.2. shall be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition No. I.E.
4. Oil and gas waste may not be accumulated speculatively. Beginning with the effective date of the permit, and annually thereafter, the amount of

waste that is recycled must equal at least 75% by volume of the cumulative amount of waste received into Cell 7 on the anniversary of the effective date of this permit. US Liquids of LA., L.P. must keep records showing the volume of waste on hand as of the effective date of this permit, the amount of waste received during each year from the effective date of this permit, and the amount of waste remaining on each anniversary of the effective date of this permit. A copy of the records shall be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition I.E. and submitted on the anniversary date of this permit.

G. CLOSURE OF COMMERCIAL RECYCLING AREA

1. All untreated waste and partially treated waste must be processed through the roadbase facility, disposed of using a method otherwise authorized by this permit, or disposed of at another permitted facility.
2. The contents of all vessels, tanks, holding cells, silos, sumps, or other containers shall be disposed of in an authorized manner.
3. The pug mill, vessels, silos, other containers and production equipment shall be removed from the facility.
4. Technical Permitting in Austin and the Corpus Christi District Office must be notified in writing 45 days prior to commencement of closure activities associated with the roadbase facility.
5. Roadbase facility closure shall be conducted in accordance with the requirements of Condition V.E. and all other applicable provisions of this permit.

IX. GROUNDWATER MONITORING:

- A. Six (6) monitor wells shall be installed at the site in the locations indicated on the facility diagram, Permit Appendix A-Amended dated April 8, 2008.
- B. Background sampling shall be conducted on a quarterly basis the first year after installation of the monitor wells.
- C. The samples collected from the monitor wells during the quarterly background sampling events and samples from the monitoring well collected once every fourth year thereafter, shall be analyzed for the following parameters:

METALS:

Arsenic
Barium
Cadmium
Chromium
Copper
Iron
Lead

Manganese
Mercury
Nickel
Selenium
Silver
Zinc

OTHER PARAMETERS:

Ammonia-nitrogen
Calcium
Magnesium
Sodium
Carbonate
Bicarbonate
Sulfate
Chloride
Fluoride
Nitrate (as N)
Gross Alpha
Gross Beta
Groundwater elevation (MSL)
Total Petroleum Hydrocarbon

Total dissolved solids
Phenolphthalein alkalinity
as CaCO
Alkalinity as CaCO₃
Hardness as CaCO₃
pH
Specific Conductance
Anion-cation balance
Total organic carbon (TOC)
Benzene
Toluene
Ethylbenzene
Xylene

- D. After background values have been established, at least one (1) sample per well shall be collected on a semiannual basis and analyzed for the following parameters:

pH
Total Petroleum Hydrocarbon (TPH)
Chloride
Specific Conductance
Groundwater elevation (MSL)
Total organic carbon (TOC)
Benzene
Toluene
Ethylbenzene
Xylene
Metals:

Arsenic
Barium
Chromium
Iron

Lead
Manganese
Nickel
Zinc

- E. A copy of all analytical results from the above sampling events must be submitted to Technical Permitting in Austin and to the Corpus Christi District Office as part of the Semiannual Report required by Condition No. I.E. of this permit.

X. GENERAL FACILITY CLOSURE:

- A. The contents of all vessels, tanks, sumps, pits, or other containers shall be disposed of in an authorized manner.
- B. Provisions shall be taken to prevent erosion both during and following closure.
- C. The estimated cost to accomplish closure of the facility shall be itemized and reported to Technical Permitting in Austin in accordance with Rule 78. This estimate shall be revised each year to consider volume of waste and inflation. A copy of the annual estimate shall also be sent to Mr. Rolando Raymond, 1405 Guatemozin, Laredo, TX 78040.
- D. Technical Permitting in Austin and the Corpus Christi District Office must be notified in writing 45 days prior to commencement of closure activities.
- E. A notation on the deed to the property shall be made to notify any potential purchaser of the property that the land has been used for disposal of oil and gas wastes and that disturbance of the site acreage is prohibited.

XI. POST-CLOSURE CARE AND MONITORING:

- A. The site shall be monitored for a period of no less than five (5) years after closure of the facility.
 - 1. Post-closure care shall include the quarterly inspections of the entire facility by a registered professional engineer for signs of deterioration.
 - 2. Any areas showing signs of erosion shall be re-capped and re-seeded in a timely manner.
 - 3. Each leachate collection sump shall be checked. If leachate is discovered, it shall be pumped out and analyzed for hazardous waste characteristics. Non-hazardous leachate shall be disposed of in an authorized off-site injection well. If any of the analyses of the leachate indicate hazardous waste characteristics, Technical Permitting shall be notified immediately.
 - 4. The groundwater monitoring wells shall be sampled annually and the fluid analyzed for the parameters listed in Condition No. IX.D. of this permit.

5. A summary of the results of the post-closure inspections and copies of all analyses required during the post-closure monitoring activity must be submitted to Technical Permitting in Austin and the Corpus Christi District Office.
6. The permittee must request in writing permission to cease post-closure monitoring. Post-closure monitoring requirements may be extended by Technical Permitting in Austin based on the results of the monitoring results.
7. Upon receiving permission to cease post-closure monitoring, the monitoring wells shall be properly plugged.

XII. SPECIAL CONDITIONS:

- A. A 200-foot buffer zone shall be maintained between the permitted facility and its southeastern offsetting property.
- B. Landscape screening will be provided between the service road at the base of the landfill slope and the southeastern property boundary for a distance of approximately 800 feet, beginning at a point 220 feet from the southeast corner of the facility. Screen plantings will consist of mostly native Texas trees and shrubs arranged in a naturalistic manner so as to harmonize with the natural vegetation and be self-sustaining once established. The trees will be planted in a mixture of sizes from 15 gallons up to 100 hundred gallons. The spacing between the trees, shrubs, and ground covers will be established so as to provide proper growth characteristics for the species of plants used, as well as allow for any required maintenance.

This authorization is granted subject to review and cancellation should investigation show that such authorization is being abused.



Jill Hybner, Manager
Environmental Permits and Support
Technical Permitting

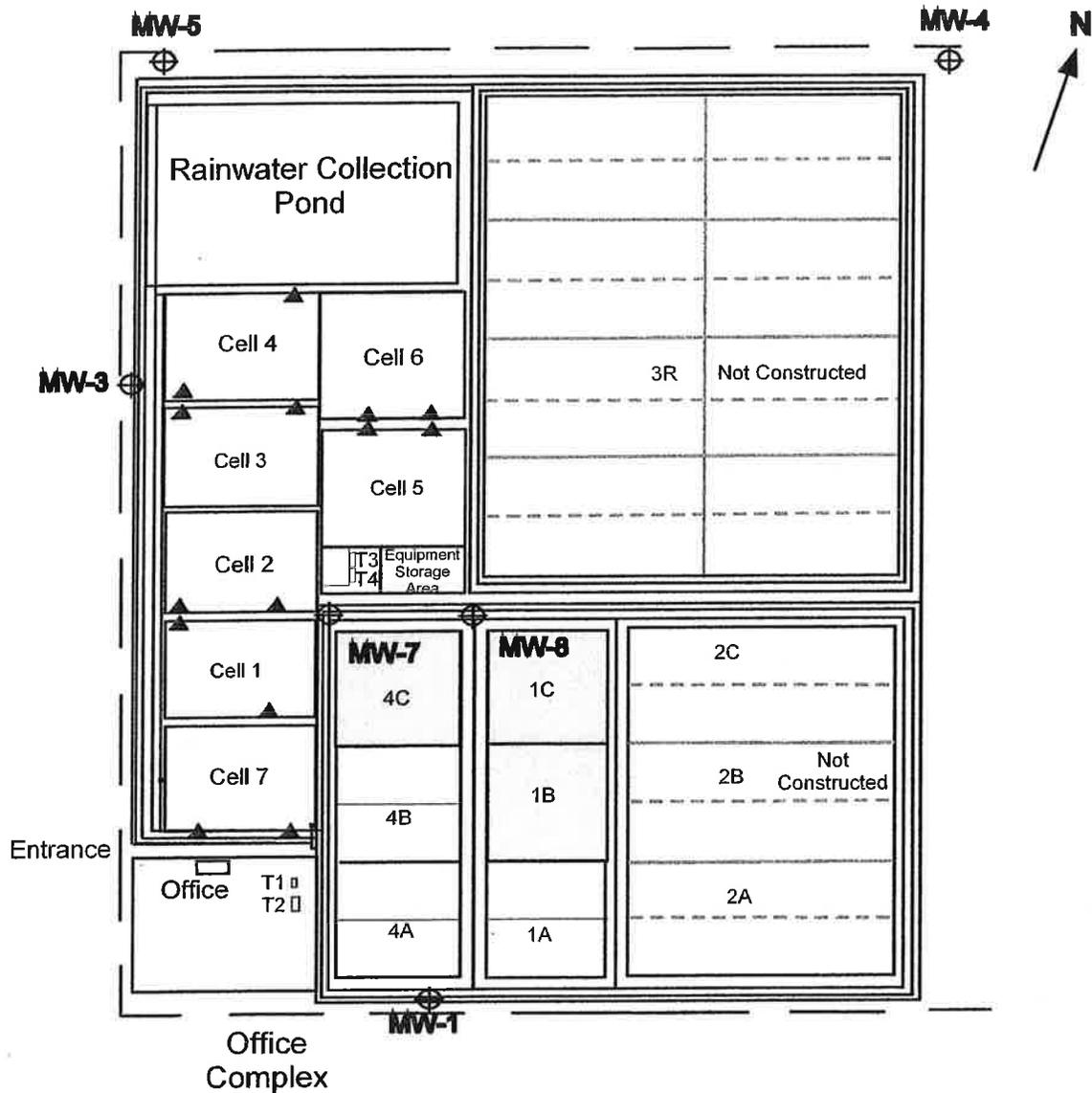
Notes:

- (1) Amends permit to delete the term "Environmental Services" and replace with the term "Technical Permitting."
- (2) Amends first introductory paragraph to authorize the permittee to recycle certain non-hazardous wastes as specified by the permit.

- (3) Amends second introductory paragraph to state that this permit grants authority to “recycle waste in accordance with” 16 TAC Chapter 4, Subchapter B.
- (4) Amends Condition No. I.E to incorporate the leak detection system records from Condition No. VI.D.4, and the commercial roadbase recycling process records from Condition Nos. VIII.B.4.b, VIII.C.9, VIII.F.3, VIII.F.4 in the Semiannual Report, and to clarify the six-month reporting period and due dates for the report.
- (5) Amended Condition No. I.H to replace reference to Texas Department of Health with Texas Department of State Health Services.
- (6) Amended Condition No. II.B.1 to replace “combined with” with “or” to match the wording of the Texas Department of State Health Services NORM rule; and to remove the phrase “Beginning six months from the date of this permit” from the second sentence.
- (7) Amended Condition No. II.B.5.d to replace reference to Appendix 1 of the permit application with Permit Appendix B.
- (8) Amended Condition No. III.D to remove the phrase “Prior to beginning operations” because the facility has already begun operations.
- (9) Amended Condition No. III.F to remove the phrase “Prior to beginning operations” because the facility has already begun operations.
- (10) Amended to add Condition No. III.G to reference and incorporate new commercial recycling facility plan view as Permit Appendix C.
- (11) Amended to remove Condition No. V.A.7 requiring lysimeters to monitor the soil-pore liquid in the Landtreatment Area.
- (12) Amended to remove Condition No. V.D.4 requiring analyses of soil-pore liquid in the lysimeters to monitor the Landtreatment Area, and renumbered former Condition Nos. V.D.5 and V.D.6 as V.D.4 and V.D.5, respectively.
- (13) Amended Condition No. VI.A.1 to enumerate the designated landfill subcells and to renumber Cell 2R to Cell 2.
- (14) Amended Condition No. VI.A.3 to clarify the clay cap be installed and compacted in eight (8) inch lifts to a dry density of at least 95% of the maximum dry density.
- (15) Amended to add Condition No. VI.A.7 to authorize an alternative 60-mil HDPE secondary liner and, if used, a geonet drainage layer between the liners.
- (16) Amended to add Condition No. VI.A.8 to require the liners and leak detection systems are installed in accordance with the manufacturer’s specifications and sound engineering practices.
- (17) Amended to add Condition No. VI.A.9 to authorize an alternative synthetic liner material to the 60-mil HDPE, upon prior approval of the material by Technical Permitting.
- (18) Amended to add Condition No. VI.A.10 to authorize disposal cells 2 and 3 be constructed with the base of the excavation at an alternative grade level provided updated soil balance calculations showing a net soil surplus for the facility closure at the time of construction are submitted to and approved by Technical Permitting.
- (19) Amended to add Condition No. VI.D.1 to require the landfill leak detection systems be monitored weekly for the presence of liquids.
- (20) Amended to add Condition No. VI.D.3 to require recordkeeping of the leak detection system monitoring results.

- (21) Amended to add Condition No. VI.D.4 to require the results of leak detection system monitoring to be submitted as part of the Semi-Annual Report
- (22) Amended to add Condition No. VI.D.5 to require notification of Technical Permitting and the Corpus Christi District Office within 24 hours if the leak detection system indicates liner failure.
- (23) Amended to add Condition No. VI.D.6 to require, if the leak detection system indicates liner failure, disposal into the landfill cell must cease immediately and the liner inspected for deterioration and leaks within 5 days and the liner must be repaired before use of the cell may continue.
- (24) Amended Condition No. VI.D.7 to increase the maximum level of waste allowed in each landfill cell from 24 to 40 feet above grade as shown on the amendment application received April 22, 2008.
- (25) Amended to add Condition No. VI.E. CLOSURE OF LANDFILL CELLS; and renumber previous condition nos. VI.D.3, VI.D.4, and VI.D.5, as Condition Nos. VI.E.1, VI.E.2, and VI.E.3, respectively.
- (26) Renames previous "VII. RAINWATER/LEACHATE COLLECTION AREA" as "VII. RAINWATER COLLECTION AREA" to clarify that leachate is not stored in this area.
- (27) Amended to add Condition No. VII.A.4 to authorize the option to construct the eastern portion of the rainwater collection pond for the purpose of storing contact rainwater collected from the landtreatment cells, provided: a) the chloride concentration is less than 3,000 mg/l, b) financial security is submitted to and approved by Technical Permitting in Austin prior to use of the eastern portion of the rainwater collection pond for the storage of contact rainwater, c) Technical Permitting in Austin and the Corpus Christi District Office are notified at least 30 days prior to beginning construction, and d) The Corpus Christi District Office verifies the eastern portion of the rainwater pond has been constructed in accordance with the permit amendment application dated April 8, 2008.
- (28) Amends permit to add new section entitled "VIII. COMMERCIAL RECYCLING AREA – ROADBASE PROCESS", which includes Conditions VIII.A through VIII.G. Authorizes treatment of authorized wastes for reuse as roadbase and specifies the general design, construction, operation, process control, final disposition and closure of the Commercial Recycling Area.
- (29) Renumbers previous "VIII. GROUNDWATER MONITORING" as "IX. GROUNDWATER MONITORING" due to addition of new Commercial Recycling Area conditions as Section VIII.
- (30) Renumbers previous "IX. GENERAL FACILITY CLOSURE" as "X. GENERAL FACILITY CLOSURE" due to addition of new Commercial Recycling Area conditions as Section VIII.
- (31) Amended Condition No. IX.A (formerly Condition No. VIII.A) to update referenced diagram for monitoring well locations from the permit application attachment II to the facility diagram, Permit Appendix A – Amended dated April 8, 2008.
- (32) Renumbers previous "X. POST-CLOSURE CARE AND MONITORING" as "XI. POST-CLOSURE CARE AND MONITORING" due to addition of new Commercial Recycling Area conditions as Section VIII.

- (33) Renumbers previous "XI. SPECIAL CONDITIONS" as "XII. SPECIAL CONDITIONS" due to addition of new Commercial Recycling Area conditions as Section VIII.
- (34) Amended Condition No. XI.A.2 (formerly Condition No. X.A.2) to add requirement that any areas showing signs of erosion shall be re-capped and re-seeded "in a timely manner".
- (35) Amended Condition No. XII.A.1 (formerly Condition No. XI.A.1) to replace 100-foot buffer zone with 200-foot buffer zone.
- (36) Amended to replace the former facility diagram Permit Appendix A – Amended with new Permit Appendix A – Amended dated April 8, 2008.
- (37) Amended to add roadbase process flow diagram as Permit Appendix D.



- ⊕ Monitoring Well Locations
- ▲ Lysimeter Locations
- - - Site Boundary
- Constructed Landfill Cell

Permit Appendix A - Amended
US LIQUIDS OF LA, L.P.
 Stationary Treatment Facility (STF) Permit
 South Texas Disposal Facility
 Zapata County - 120-Acres
 Permit No. STF-006
 Effective Date: May 21, 2010



South Texas Disposal Facility	
Project: Zapata	Date: April 8, 2008
Approved:	Figure 2

US Liquids of LA
Zapata Facility
STF-006

Waste Acceptance Plan
Revision 1
May 29, 2000

PERMIT APPENDIX B

PERMIT NO. STF-006

WASTE ANALYSIS PLAN

WASTE ACCEPTANCE PROCEDURES FOR THE US LIQUIDS' ZAPATA FACILITY

Companies that engage in waste management activities accept certain responsibilities. The main responsibilities accepted by the Zapata facility include ensuring that the wastes received are within the criteria set by the RRC; that the wastes are compatible with the design and construction of the facility; and that the wastes will not degrade or impact the environment. To meet these responsibilities, the Zapata facility will follow the procedures outlined in this Waste Analysis Plan (WAP) for profiling, screening and receiving wastes.

1.0 AUTHORIZED WASTES

The wastes that are authorized by this permit are outlined in Section II.A and B of Permit No. STF-006 (Permit). The Zapata facility accepts oil and gas wastes that are generated in the United States and Mexico. Wastes from Mexico will be accepted at the Zapata facility based on the Permit conditions and limitations. Once the wastes enter Texas, they will be under the jurisdiction of the RRC.

USL will utilize a three Tier system to organize, define and manage the wastes at the Zapata Facility. The authorized wastes, as listed in the Section II.A and B, are presented in Table 1 with the USL Tier designation.

Tier I waste includes the routine RCRA exempt exploration and production wastes from the oil and gas industry as outlined in the permit. These wastes will go directly into the land treatment cells or occasionally into the solidification basins or into the landfill cells. (Materials that go directly to a landfill cell will meet Permit Condition VI.B.) Tier II includes non-exempt oil and gas wastes as defined in the Permit, oil and gas wastes from Mexico, and tank bottoms from gas plants, crude oil reclamation plants and crude oil production/separation facilities. The waste materials will either be placed in the land treatment cells, solidification basins, or a landfill cell. Tier III wastes are solid materials that will go directly to a disposal cell.

USL Response**Table 1 (Revised)**

Tier Number	Authorized Wastes
I	Water-base drilling fluid and associated cuttings
I	Oil-base drilling fluids and associated cuttings
I	Waste material from produced water collecting pits
I	Produced formation sands
I	Soil contaminated with produced water, crude oil, or condensate
II	Tank bottoms from gas plants, crude oil reclamation plants, and crude oil production/separation facilities
II	RCRA non-exempt waste
II	Wastes from Mexico
III	Solid wastes from gas dehydration and sweetening, such as spent glycol and amine filters, solid filter media, molecular sieves, and precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber sludge.
III	Iron sulfide
III	Spent activated carbon and other filtering and separation media
III	Liners from pits that contained exempt oil and gas waste
III	Inert wastes as defined by Statewide Rule 8
III	And other non-hazardous, non-injectable, non-reclaimable, oil and gas waste generated in connection with the exploration, development and production of oil and gas resources.

2.0 WASTE PROFILES

Waste profiles will be developed for each waste stream that enters the Zapata Facility. At a minimum, this will include a completed US Liquids manifest and a set of screening analysis. The screening analysis will be conducted either prior to acceptance of the waste at the facility or at the facility at the time of the first waste shipment. The screening analyses will include pH, EC, soluble chlorides and oil and grease content. Procedures for these analyses are provided in 4.0. USL will maintain a data base with all entries of each waste stream.

Once a waste stream has been characterized, all additional loads for that waste stream will be analyzed, at a minimum, for soluble chlorides, electrical conductivity and pH. USL may choose to run other screening analysis on each waste load, as they deem necessary.

USL will implement the following formalized profiling procedures in order to evaluate each waste stream on a case by case basis. These procedures are organized by Tier level and are presented in Table 2.

Table 2. Profiling Requirements for the Tier I, II, and III Wastes

Tier Level	Profiling Requirements
I	<ul style="list-style-type: none"> <input type="checkbox"/> Complete USL Manifest <input type="checkbox"/> Screening analysis for pH, EC, soluble chlorides and hydrocarbon concentration
II	<ul style="list-style-type: none"> <input type="checkbox"/> Complete USL Manifest <input type="checkbox"/> Screening analysis for pH, EC, soluble chlorides and hydrocarbon concentration <input type="checkbox"/> Complete Oilfield Waste Characterization Data Sheet <input type="checkbox"/> Prior to receipt at the site, representative samples of the following wastes will be subjected to analyses and limitations presented below: <ul style="list-style-type: none"> ▪ Waste from commercial oil and gas facilities and reclamation plants will include Permit requirements presented in Section II.B.2. ▪ Waste from incoming RCRA non-exempt waste will include Permit requirements presented in Section II.B.3. ▪ Waste from Mexico waste will include Permit requirements presented in Section II.B.4.
III	<ul style="list-style-type: none"> <input type="checkbox"/> Complete USL Manifest <input type="checkbox"/> Screening analysis for pH, EC, soluble chlorides and hydrocarbon concentration <input type="checkbox"/> Complete Oilfield Waste Characterization Data Sheet

3.0 WASTE MANIFESTS AND WASTE CHARACTERIZATIONS SHEETS

3.1 Manifests

The Zapata facility will require a manifest to accompany each load of waste that enters the facility. The first Manifest for a waste stream will serve as part of the Profiling information and as the manifest for that particular waste shipment. The manifest will be delivered to Zapata personnel in the office when the truck arrives at the Zapata facility. Manifests will be kept onsite for three years.

A copy of the manifest is provided as Attachment I of this WAP. The manifest includes the following information:

- Generator name
- Origin site identification and RRC lease and/or permit number
- Carrier name

- Amount of waste shipped
- Type of waste and generator waste description
- Nonhazardous declaration statement by generator
- Screening analysis results (Note that the current manifest does not include Hydrocarbons, but this will be added to the next printing and will be written in on the current manifests.)

3.2 Oilfield Waste Characterization Sheets

An Oilfield Waste Characterization Data Sheet (OWCDS) will be completed for all Tier II and Tier III wastes. The OWCDS form is presented as Attachment II. The OWCDS will be completed in full. In the case where the generator does not know or is unclear of a particular section of the sheet, he will indicate so by placing N/A (not available) as an answer. All information provided by the generator pertaining to the waste stream will be attached to the OWCDS.

4.0 WASTE PROFILE SCREENING PROCEDURES

4.1 Sample Collection

Upon arrival at the facility, the first load of a waste stream shall be checked for conformity if a pre-analysis has been conducted. If the analysis is performed at the facility, a composite sample will be collected for the screening analyses. For loads arriving in a vacuum truck, a composite sample will be obtained with a Coliwassa (Composite Liquid Waste Sampler), a Kemmerer Sampler or other suitable device that will obtain and yield a representative sample of the waste load. For loads arriving in dump truck type vehicles, a sample will be obtained by collecting a composite of grab samples utilizing a scoop, shovel or similar device.

After the USL representative obtains or supervises and witnesses the sampling of an incoming load, it will be contained in an appropriate container and labeled with appropriate details for the Generator, Lease of site name, number, survey and/or county, description of the waste, manifest number, date and person sampling.

All information obtained will be recorded on the "Daily Waste Acceptance Log", which the facility uses for tracking all incoming waste loads. Samples taken will be kept in the facility's archives for a period of 60 days.

4.2 Analyses Procedures

The onsite screening procedures are provided below.

4.2.1 pH.

The pH of solid waste materials will be determined by creating a 1:1 slurry of the waste with deionized water and then testing the slurry. For samples that produce free water, the water portion of the sample will be directly tested. Solid samples will be rinsed with deionized water and the rinsate tested.

4.2.2 Electrical Conductivity and Soluble Chlorides

The electrical conductivity of wastes will be performed by first obtaining a relatively clear liquid sample (using a vacuum filtration system if necessary) by utilizing a conductivity meter. The chloride content will be determined from the reading obtained by appropriate conversion methods or by using a chloride titration method. Solid samples will be rinsed with deionized water and the rinsate tested.

4.2.3 Oil and Grease Content

Laboratory analytical procedures for oil and grease or TPH (Method 418.1) may be used to determine the hydrocarbon content. For onsite determinations, the Baroid Oil and Water Retort Method will be used to determine the oil content. Solid samples that have hydrocarbon contamination associated with them will be rinsed with deionized water and the rinsate tested. For samples that are visually not impacted by hydrocarbons, this analysis will not be conducted, and the Hydrocarbon space on the Manifest will be marked "NA" for not appropriate.

5.0 WASTE VERIFICATION PROCEDURES

The Zapata facility will verify each load of waste that comes into the facility. First, the manifest will be reviewed to be sure it is complete. Any omissions will be completed prior to unloading the wastes. Each load will also be visually checked to verify the material is consistent with the manifest. A subsample will be collected from each incoming waste load and analyzed for soluble chlorides. If deemed necessary, USL will also analyze pH, EC and/or hydrocarbon concentration. Once the laboratory determinations are completed, the truck will be directed to the proper location for unloading.

If USL determines that there are any discrepancies in the manifest or the waste load, then the generator will be contacted. If the discrepancies cannot be explained, then USL will refuse to accept the load.

6.0 RECORDKEEPING

The waste generator will complete a manifest supplied by the Zapata facility. US Liquids will maintain manifests and generator sample analysis reports on file for three years. Facility personnel will compile a summary of waste quantities received for each semiannual report.

ATTACHMENT I

US Liquids Oil and Gas Waste Manifest



NON - HAZARDOUS
OILFIELD WASTE MANIFEST

FOR OFFICE USE ONLY
Customer Acct. No. _____
Ticket No. _____

GENERATOR

NO. 49443

Generator's Name _____
Address _____
Phone No. _____

Well/Lease Name _____
Number _____
County _____
R.R.C. No. _____

WASTE DESCRIPTION/CODE	QUANTITY	UNITS

CODES
D - DRUM
B - BARREL
C - CARTON
P - POUNDS
Y - YARDS
O - OTHER

I hereby certify that the above listed material(s), is (are) not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law. That such waste has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulation.

AUTHORIZED AGENT'S NAME (PRINT) DATE SIGNATURE

TRANSPORTER

Transporter's Name _____
Address _____
Phone No. _____

Driver's Name _____
(Print) _____
Vehicle's No. _____
R.R.C. No. _____

I hereby certify that the above named material(s) was/were picked up at the Generator's site listed above and delivered without incident to the disposal facility listed below.

SHIPMENT DATE DRIVER'S SIGNATURE DELIVERY DATE DRIVER'S SIGNATURE

DISPOSAL FACILITY

Name _____ Phone No. _____
Address _____
Chemical Analysis: Chloride _____ Conductivity (mmhos/cm) _____ pH _____

I hereby certify that the above material has been accepted and that the information presented on this document are true and accurate.

NAME (PRINT) DATE ORIGINAL SIGNATURE

ATTACHMENT II

US Liquids Oilfield Waste Characterization Data Sheet

**US LIQUIDS OF LA
OILFIELD WASTE CHARACTERIZATION DATA SHEET**

Generator Information

Operators Name _____	Lease Name _____
Address _____	Well Unit # _____
Company Rep. _____	County _____
Title _____	RRC # _____

General Waste Stream Information

Description of Waste: _____
 Process Generating Waste: _____
 Composition: ___ % Solids ___ % Liquids ___ % Hydrocarbons ___ % Other (describe) _____
 Would this waste be considered a listed or characteristic hazardous waste as defined in 40 CFR Part 261? ___ Yes ___ No
 Is this waste produced in connection with the Exploration, Development or Production of Oil and/or Gas? ___ Yes ___ No
 Anticipated volume: _____ Bbls _____ Cubic Yards _____ Tons _____ Other
 Frequency: _____ Day _____ Week _____ Month _____ Year _____ One Time _____ Other

Waste Properties at 72 Degrees Fahrenheit

a) Physical State	___ Solid	___ Semi-solid	___ Liquid	___ Powder	___ Combination
b) Odor	___ None	___ Mild	___ Strong	Describe _____	_____
c) Flash Point (F)	___ <100	___ 101 - 140	___ > 140	___ NA	_____
d) Chlorides	_____ ppm	e) EC	_____ mhos/cm	f) Hydrocarbons	_____ %
g) pH	___ <2.0	___ 2.1 - 7.0	___ 7.1 - 12.5	___ >12.5	___ NA
h) Metals (ppm)	___ NA	___ Arsenic	___ Barium	___ Cadmium	___ Chromium
		___ Lead	___ Silver	___ Mercury	___ Selenium
i) Density Range	___ NA	___ lbs/gal	___ lbs/ yd ³	___ g/cc	___ other
j) Color	Describe: _____				
k) Organics	TCLP	___ was performed	___ was not performed		
l) Other constituents of concern	_____				

Reactivity

Note if the waste exhibits any of the following reactive properties:
 ___ Water reactive ___ Alkaline reactive ___ Acid reactive ___ None of the above
 ___ Thermally sensitive ___ Explosive ___ Pyrophoric

This Waste Contains

___ Free liquids	___ Free sulfide	___ Pesticides	___ Radioactive materials
___ Free cyanide	___ Organic solvents	___ Used or waste oils	___ None of the above

Supplemental Information

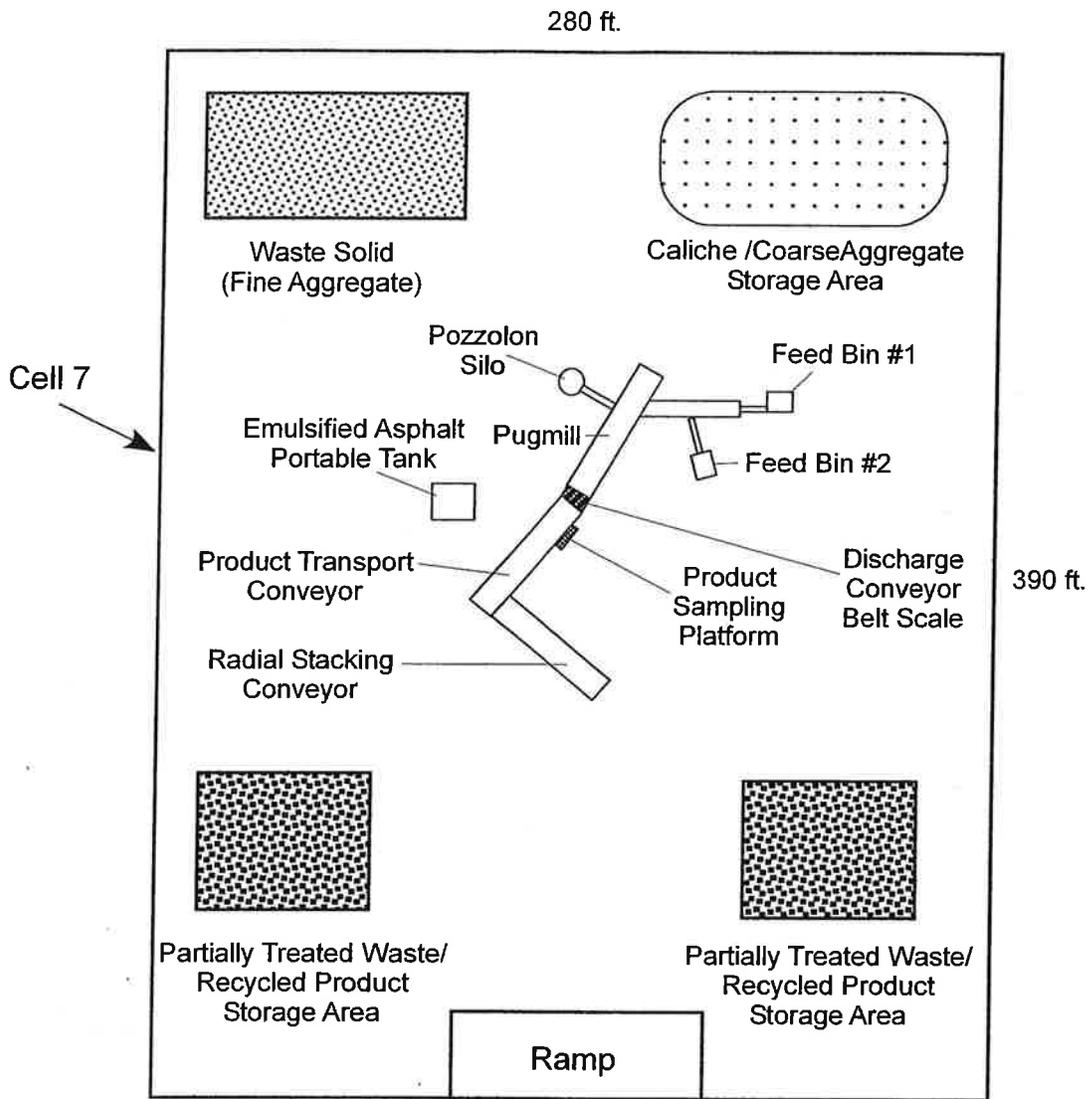
___ None ___ MSDS ___ Analytical Data ___ Memo/Letter ___ Other (_____)

Generators Information

I hereby certify the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exists, that all known or suspected hazards have been disclosed and that the waste is not a listed waste or exhibits hazardous characteristics set forth in 40 CFR 261.20 - .24.

Generator's Authorized Signatory: _____ Date: _____

_____	_____	_____	_____
Print Name	Signature	Title	Initials



Waste Solids
(as authorized by STF-006)

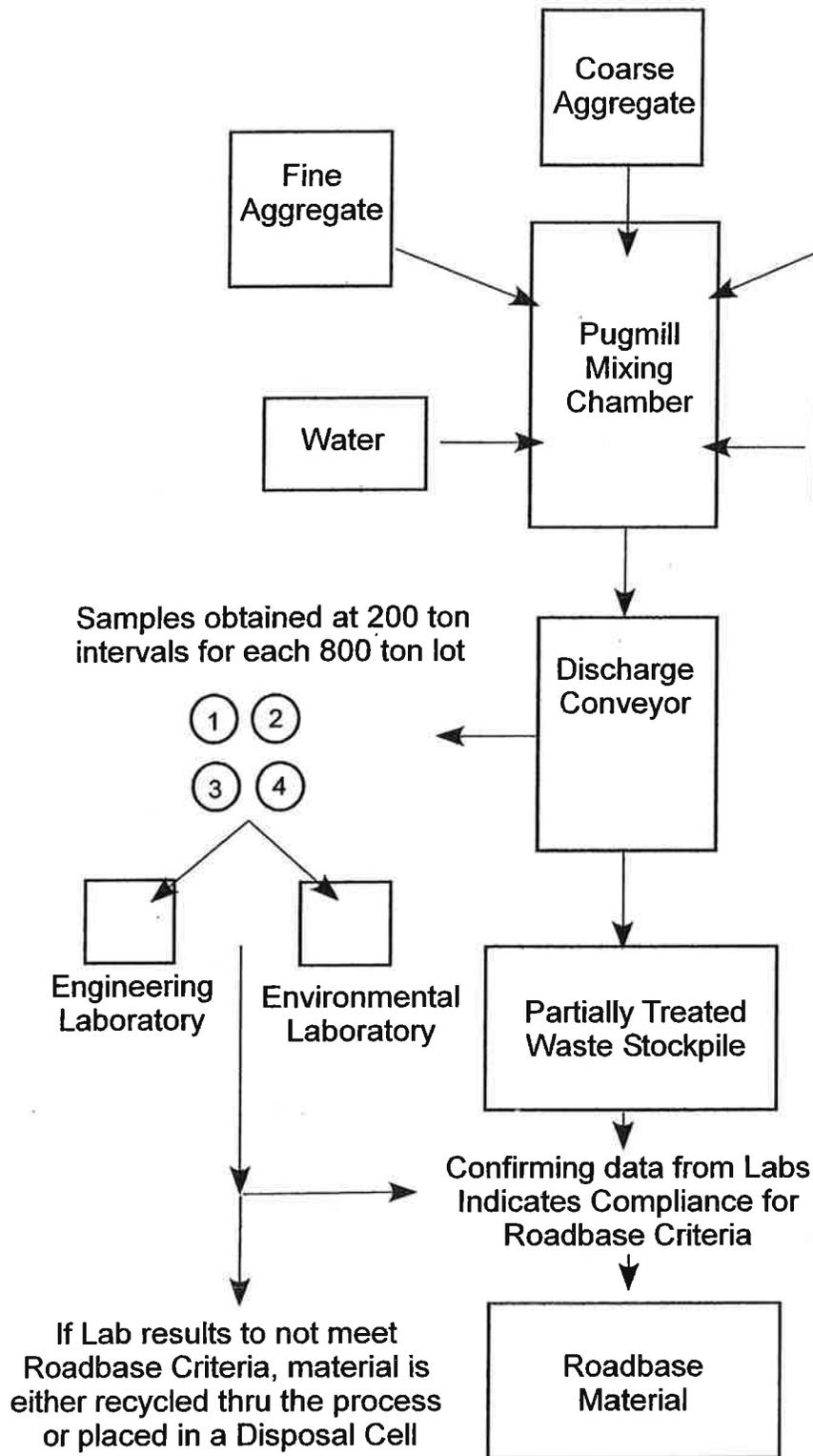
Source:
Disposal Cells
Land Treatment Cells
Incoming Trucks

Permit Appendix C
US LIQUIDS OF LA, L.P.
 Stationary Treatment Facility (STF)
 South Texas Disposal Facility
 Zapata County - 120-Acres
Permit No. STF-006
Effective Date: May 21, 2010

N →
Not to scale



Commercial Recycling Facility Plan View	
Zapata Facility	April 8, 2008
Approved :	Figure 7.2



Permit Appendix D
US LIQUIDS OF LA, L.P.
 Stationary Treatment Facility (STF)
 South Texas Disposal Facility
 Zapata County - 120-Acres
Permit No. STF-006
Effective Date: May 21, 2010



Roadbase Process Flow	
Zapata Facility	April 10, 2008
Approved:	Figure 7.4