



RAILROAD COMMISSION OF TEXAS

OIL AND GAS DIVISION

Permit No. STF-038 AMENDED

US LIQUIDS OF LA, LP
16945 NORTHCASE DRIVE STE 2200
HOUSTON, TX 77060

Based on information contained in your application received May 6, 2011 and subsequent information received to date, you are hereby authorized to receive, store, handle, treat and dispose of certain oil and gas wastes as specified below at the following facility:

Eagle Ford West Facility, Commercial Oil & Gas Waste Separation/Treatment/Recycling Facility
Texas and New Orleans Railroad Survey, A-758
Dimmit County, Texas
RRC District 01

Incoming waste will be offloaded at one of several areas of the facility depending on the liquid content and composition of the waste. The Staging Cells will be used for receiving and separating of the wet materials. Liquids will go to the Water Management Pond or the injection well system. Solid wastes will be unloaded at the Receiving Area. The Water Management Pond will be used to contain water from the waste separation and dewatering processes and contact storm water runoff from the site. The Thermal Desorption System will be used to treat drilling fluids and associated cuttings. Waste solids will be applied to the Treatment Cells for further drying/processing. After dewatering, solids will be taken to the Roadbase Recycling Area and blended with a coarse aggregate and binding agent to create recyclable product or disposed of in one of the Disposal Cells.

Authority is granted to receive, store, handle, treat and dispose of oil and gas wastes in accordance with Statewide Rule 8 and subject to the following minimum conditions:

I. GENERAL PERMIT CONDITIONS

- A. This permit is effective **April 25, 2013**, and expires **August 8, 2017**.
- B. This permit may be considered for administrative renewal upon request and subsequent review by the Commission.
- C. This permit is nontransferable without the consent of the Commission.
- D. No waste may be received at the referenced facility until a site-specific Spill Prevention, Control and Countermeasure (SPCC) Plan is provided to and approved by

Technical Permitting. A copy of the approved SPCC Plan must be maintained on-site and made available for review and inspection.

- E. The permittee shall make all records available for review and/or copying during normal business hours upon request of Commission personnel.
- F. All laboratory analyses required to be performed by Conditions II.B.2, II.B.3, II.B.4, IX.K, XII.I, XII.P, and XIII.I shall be performed by an independent laboratory neither owned nor operated by the permittee.
- G. Failure to comply with any provision of this permit will be cause for modification, suspension, or termination of this permit.
- H. The permittee shall submit a Semiannual Report containing the applicable information required in Conditions III.B, IV.H, V.C, VII.D, IX.C, IX.N, XI.R, XII.O, XII.R, and XIV.E of this permit.

The first Semiannual Report shall cover the period beginning on the effective date of the permit and ending December 31, 2012. The reporting periods shall thenceforth be 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 and the San Antonio District Office no later than the 31st day of the month following each reporting period, or each January 31 and each July 31, respectively.

II. INCOMING WASTES

A. AUTHORIZED WASTES

- 1. Only non-hazardous wastes subject to the jurisdiction of the Railroad Commission of Texas may be received or processed at this facility. This permit authorizes the receipt and disposal of only the following oil and gas wastes:
 - a. Water based drilling fluids and associated cuttings;
 - b. Oil based drilling fluids and associated cuttings;
 - c. Iron sulfide, which has been fully oxidized;
 - d. Contaminated soils from crude oil spills, pipeline and saltwater spills;
 - e. Absorbent pads from crude oil spills;
 - f. Formation sands and other solids from saltwater storage tanks or vessels and saltwater pits;
 - g. Solid waste from gas dehydration and sweetening (spent filters and filter media, molecular sieves, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber sludge);

- h. Production tank bottoms which do not exceed 7% in oil content as determined by a Standard API Shakeout;
 - i. Waste solids resulting from crude oil reclamation;
 - j. Liners from reserve and washout pits;
 - k. Non-hazardous oil and gas wastes from Mexico.
2. No produced water or free oil may be disposed of at the facility.
 3. No iron sulfide waste may be received or disposed of at the facility unless the waste has been fully oxidized.
 4. No oil and gas NORM (Naturally Occurring Radioactive Material) waste defined in 16 TAC §4.603 or waste from a facility that is licensed by the Texas State Health Services to process or treat oil and gas NORM waste may be received at this facility.
 5. 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. No hazardous waste as defined by the U.S. Environmental Protection Agency in 40 CFR Part 261 or industrial waste may be received or disposed of at the facility.

B. TESTING REQUIREMENTS FOR INCOMING WASTES

1. For the purposes of this permit, a representative sample of incoming waste is defined as a composite sample composed of one grab sample from each 50 cubic yards of waste material from each job (e.g., from each well, pit, spill location.)
2. Prior to receipt at the site, representative samples of waste from commercial oil and gas facilities and reclamation plants must be analyzed and may not exceed the limit for 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 prior to receipt of waste.

3. Prior to receipt at the site, representative samples of incoming RCRA non-exempt waste must be analyzed for the following parameters and may not exceed the following levels:

<u>PARAMETER</u>	<u>LIMITATION</u>
Corrosivity	pH 6 – 10
Ignitability	No materials exhibiting the characteristic

Reactivity	of ignitability as defined by RCRA No materials exhibiting the characteristic of reactivity as defined by RCRA
Toxicity	No material exhibiting the characteristic of toxicity as defined by RCRA

<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

<u>PARAMETER</u>	<u>LIMITATION</u>
Benzene	< 0.5 mg/l

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

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

<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
Benzene	< 0.5 mg/l

5. 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 microroentgens 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 combined with Radium-228 or 150 picocuries per gram of any other radionuclide.

III. RECORDKEEPING REQUIREMENTS

- A. The permittee shall maintain the following records on each load of waste received at the facility for a period of three (3) years from the date of receipt:
 1. Description of the site where the waste was generated, including:
 - a. Generator name;
 - b. Lease name and number or gas ID or API Well Number;
 - c. County;
 2. Name of transporter;
 3. Amount of waste material (specify units); and
 4. A description of the type of waste material, including:
 - a. Fluid-to-Solid ratio; and
 - b. Detailed description of the type of waste including any analysis required by II.B.2, II.B.3 and II.B.4 above.
- B. A report of all records required by Condition III.A. above, as well as a summary of waste receipts including the volume of each type of material received on a monthly basis shall be submitted to Technical Permitting in Austin and the San Antonio District Office as part of the Semiannual Report required in Condition I.I. of this permit.

IV. GENERAL SITE CONSTRUCTION AND MAINTENANCE REQUIREMENTS

- A. The general layout and arrangement of the facility shall be consistent with the site layout received June 29, 2012, which is attached to and incorporated as part of this permit as **Permit Appendix A**.
- B. The facility will be developed in three phases. Phase I will consist of a Receiving Area, a Thermal Desorption Area, a Truck Washout Area, a Road Base Recycling

Area, three 0.80-acre Staging Cells, one 1.92-acre Water Management Pond, five 2.48-acre Treatment Cells, and Two 4.86-acre Disposal Cells. Phase II will consist of the conversion of Treatment Cells No. 4 and 5 into Disposal Cell No.3 (6.86-acre). Phase III will consist of the conversion of Treatment Cells No. 1 through 3 into Disposal Cells No. 4 and 5 (3.74-acre).

- C. A sign shall be posted at each entrance to the facility, which shall show the permit number in letters and numerals at least one-inch in height.
- D. A perimeter berm shall be constructed to surround the entire facility and shall be designed to prevent storm water run-on and prevent storm water runoff from the site. The perimeter berm shall be constructed at a minimum 2 feet high, a minimum 1 foot wide at the top and a minimum of 7 feet wide at the base. The perimeter berm shall be built with a minimum 3:1 (width to height).
- E. Non-contact storm water contained within the perimeter berm shall be controlled and diverted around the various waste receiving, treatment, disposal, and recycling areas and directed to the Storm Water Detention Pond.
- F. All above ground tanks shall be diked. Dikes shall be constructed and maintained to contain the largest tank's maximum capacity, plus 12 inches of freeboard.
- G. All tanks must be maintained in a leak-free condition. If inspection of a tank reveals deterioration and/or leaks, the tank must be emptied and repaired before resuming use.
- H. The permittee must maintain a record of when the tanks are inspected and the results of each inspection. A copy of the records shall be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition I.I. of the permit.
- I. The perimeter of the property shall be enclosed with a fence suitable to keep out unauthorized access. The site is to be attended continuously or secured when unattended. Access gates shall be closed and locked when not attended by facility personnel.
- J. Protection bollards shall be installed around the oil well (Tumlinson Unit well #A-3) located at the site.
- K. Any spill of waste, or any other material shall be promptly cleaned up and disposed of in an authorized manner.

V. RECEIVING AREA CONSTRUCTION AND OPERATION

- A. The general layout and arrangement of the Receiving Area shall be consistent with the detailed layout of the Receiving Area received June 29, 2012, which is attached to and incorporated as part of this permit as **Permit Appendix B**. The Receiving Area shall consist of the following equipment:
 - Two 3,890-bbl concrete pits;
 - Four 450-bbl steel receiving boxes;
 - Two 12-bbl shaker tanks;
 - Two 90-bbl receiving liquids tanks;

- Two 420-bbl oil storage tanks;
 - Two shaker tables connected to belt conveyors;
 - Four 500-bbl liquid receiving tanks;
 - Three centrifuges;
 - One 300-bbl centrifuge feed tank;
 - One 300-bbl centrifuge centrate tank;
 - Two 950-bbl oil/water skimmer tank;
 - One 300-bbl water transfer tank.
- B. The concrete pits must be constructed of concrete at least 20 inches thick at the base of the pit, and 16 inches thick on the walls of the pit. Concrete slabs will include reinforcing steel.
- C. The integrity of the bottom of the concrete pits will be inspected monthly. If a problem is found, the San Antonio District office must be notified within 48 hours and use of the pit must cease until repaired. The permittee must maintain a record of when the bottom of the pit is inspected and the results of each inspection. This record shall be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition I.I. of this permit. Any solid or liquid waste discovered during inspection shall be removed and disposed of in an authorized manner.
- D. Unless otherwise required by conditions of this permit, construction, use, and maintenance of the pit shall be in accordance with the information represented on the application and attachments thereto.

VI. THERMAL DESORPTION AREA CONSTRUCTION AND OPERATION

- A. The Thermal Desorption Area shall consist of a treatment unit used to thermally treat drilling fluids and associated cuttings. Oil and water will be recovered and pumped to two 500-bbl storage tanks. The tanks shall be maintained in a leak-free condition.
- B. Earthen berms shall be constructed to a minimum height of 1.5 feet and minimum width of ten feet at the base surrounding the Thermal Desorption Area to prevent storm water run-on and runoff.
- C. Waste must not accumulate on the ground. Any spill of waste, or any other material, shall be promptly cleaned up and the resulting waste shall be disposed of in an authorized manner.
- D. Treated solids must be transferred to the Roadbase Recycling Area, or disposed of in a Disposal Cell.

VII. TRUCK WASHOUT AREA CONSTRUCTION AND OPERATION

- A. The general layout and arrangement of the Truck Washout Area shall be consistent with the layout of the Truck Washout Area received June 29, 2012, which is attached to and incorporated as part of this permit as **Permit Appendix C**. The

Truck Washout Area shall consist of four tanker truck wash bays and two end dump wash bays and the following equipment:

- Two 420-bbl oil storage tanks;
 - Two 950-bbl oil/water skimmer tanks;
 - Two 500-bbl wash water storage tanks;
 - One 50-bbl wash water sump;
 - One 500-bbl solids removal tanks.
- B. The Truck Washout Area equipment shall be supported on a concrete slab with a thickness of at least 16 inches. A 6-inch curb will surround the Truck Washout Water Treatment slab.
- C. The 50-bbl wash water sump will be contained within a concrete vault. The vault must be constructed of concrete at least 16 inches thick at the base and 10 inches thick on the walls of the vault.
- D. The integrity of the bottom of the concrete vault shall be inspected monthly. If a problem is found, the San Antonio District Office must be notified within 48 hours and use of the vault must cease until repaired. The permittee must maintain a record of when the bottom of the vault is inspected and the results of each inspection. This record shall be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition I.I. of this permit. Any solid or liquid waste discovered during inspection shall be removed and disposed of in an authorized manner.

VIII. STAGING CELL CONSTRUCTION AND OPERATION

- A. The Staging Cells shall be constructed with a compacted clay liner having a minimum thickness of three feet, compacted in 6-inch lifts, on the cell floor and the corresponding sidewalls. The compacted clay liner shall have a documented hydraulic conductivity of 1.0×10^{-7} cm/sec or less. A berm shall be constructed around the cell with a minimum width of 12 feet at the top and have a slope no steeper than 3H:1V. The Staging Cell floors will have a grade of 1%.
- B. The liner shall be installed in accordance with sound engineering practices.
- C. The capacity of each cell shall be a maximum of 30,400-bbl.
- D. At least two feet of freeboard must be maintained between the fluid level in the cell and the top of the berm.
- E. The liner system must be constructed in accordance with the liner installation methods included in Appendix 3 of the May 7, 2012 response to the request for additional data and as shown in Attachments 1.3.1 through 1.3.3 of the permit application engineer's drawings received June 29, 2012.
- F. Liquids separated in the staging cells will be transferred to the Water Management Pond or to the injection well for disposal.

- G. Solids shall be taken to a Treatment Cell for further dewatering or to a Disposal Cell for disposal.
- H. Storm water collected in the Staging Cells will be transferred to the Water Management Pond or to the injection well for disposal.
- I. A sign shall be posted identifying each Staging Cell using letters and numerals at least one-inch in height.

IX. TREATMENT CELL CONSTRUCTION AND OPERATION

- A. The Treatment Cells shall be constructed with a natural clay floor with the subgrade prepared by removing all deleterious items found. The subgrade will be constructed with a minimum grade of 0.5 %. A berm will be constructed around the cell with a minimum width of 5 feet at the top and have a slope no steeper than 3H:1V.
- B. Treatment Cell construction will be in accordance with the liner installation methods included in Appendix 3 of the May 7, 2012 response to the request for additional data and as shown in Attachments 1.4.1 through 1.4.4 of the permit application engineer's drawings received June 29, 2012.
- C. Waste materials applied to the Treatment Cells shall not contain free liquids. Waste materials from the Treatment Cells must pass the Paint Filter Test (EPA Method 9095) prior to placement in a Disposal Cell. Test results from each Paint Filter Test must be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition I.I of this permit.
- D. A maximum of one foot thick layer of waste material (4,000 cubic yards) may be placed in a Treatment Cell. This waste material will be dried and then removed for disposal or further processing prior to the placement of any additional waste to the cell.
- E. The Treatment Cell floors shall be inspected each time after excavation of waste and before new waste is applied and at least once each quarter. The cell floor will be inspected for deterioration and leakage. Any deterioration or leak must be repaired prior to subsequent use of the cell.
- F. The waste in the Treatment Cells shall be disked once a week to promote drying.
- G. Waste that has been sufficiently dried in the Treatment Cells shall be transferred to a Disposal Cell or to the Roadbase Recycling Area.
- H. Wastes shall not be applied to a Treatment Cell during periods of rainfall.
- I. Storm water which has come in contact with waste in the Treatment Cells will be transferred to the Water Management Pond or to the injection well for disposal.
- J. For the purposes of monitoring and sampling of soils, each Treatment Cell shall be divided into three equal-size sections. One core sample from each Treatment Cell section shall be collected using ASTM-standard approved sampling and collection procedures. One grab sample shall be obtained from each of the three zones (0-12 inches, 12-24 inches, and 24-36 inches depth below grade) in each core. The

samples from each zone shall be composited to obtain one composite sample for each of the three zones in each Treatment Cell.

- K. The composite samples for each of the three zones shall be analyzed as follows using EPA approved laboratory methods or EPA methods approved on an interim basis:

Once for baseline prior to waste application, composite samples from all three zones analyzed for TPH (carbon range up to C40+), EC, SAR, pH, As, Ba, Cr, Pb, Zn.

Thereafter:

<u>Zone</u>	<u>Frequency</u>	<u>Parameters</u>
0-12 inches	Quarterly	TPH, EC, SAR, pH
0-12 inches	Annual	As, Ba, Cr, Pb, Zn
12-24 inches	Semi-Annual	TPH, EC, SAR, pH
12-24 inches	Annual	As, Ba, Cr, Pb, Zn
24-36 inches	Annual	TPH, EC, SAR, pH, As, Ba, Cr, Pb, Zn

- L. More frequent analyses may be required depending on the results of analyses required by Condition No. IX.K.
- M. The San Antonio District Office shall be notified at least 48 hours prior to any sampling event.
- N. A data interpretation and summary of the sampling analysis including chain-of-custody and QA/QC data shall be submitted to Technical Permitting and the San Antonio District Office as part of the Semiannual Report required in Condition No. I.I. of this permit.
- O. A sign shall be posted identifying each Treatment Cell using letters and numerals at least one-inch in height.
- P. The area where the five Treatment Cells are located will be converted into Disposal Cells as the facility is developed. During Phase II development, Treatment Cell Nos. 4 and 5 will be converted into Disposal Cell No. 3. During Phase III, Treatment Cell Nos. 1, 2, and 3 will be converted into Disposal Cell Nos. 4 and 5.
- Q. Prior to conversion of a Treatment Cell, all waste must be removed and disposed of in an authorized manner.
- R. Three representative soil samples shall be obtained from each Treatment Cell and be analyzed for the constituents listed in Condition XIII.I of this permit and the constituents shall not be exceeded.
- S. A map showing the sample locations and copies of the analysis required by Condition XIII.I shall be submitted to Technical Permitting in Austin. When acceptable constituent levels have been verified in writing by Technical Permitting, the area where the Treatment Cell was located can then be converted for use as a Disposal Cell. The Disposal Cells shall be constructed in accordance with Condition XI. of this permit.

X. WATER MANAGEMENT POND CONSTRUCTION AND OPERATION

- A. Technical Permitting in Austin and the San Antonio District Office must be notified in writing upon final completion of construction of the Water Management Pond. The permittee may not begin using the pond until the District Office has completed an inspection of the cell and provided written verification that the pond is constructed in accordance with the application and permit.
- B. A sign shall be posted identifying the Water Management Pond using letters at least one-inch in height.
- C. A berm shall be constructed around the Water Management Pond with a minimum width of 22 feet at the top and have a slope no steeper than 3H:1V.
- D. A liner anchor trench must be used to key the synthetic liner to the berm.
- E. At least 3 feet of freeboard must be maintained between the fluid level of the pond and the top of the berm.
- F. Unless otherwise required by the conditions of this permit, construction, use, maintenance, and closure of the cell shall be in accordance with the information represented on the permit application and the attachments thereto.
- G. The Water Management Pond must be lined with a high-density polyethylene primary liner with a thickness of at least 60 mils and a high-density polyethylene secondary liner with a thickness of at least 40 mils.
- H. The Water Management Pond must be equipped with a leak detection system, which will consist of a geonet (on the floor) and geocomposite (on the side slopes) placed between the primary and secondary liners.
- I. The pond must be constructed, and the liner/leak detection system must be installed, in accordance with sound engineering practices and liner/leak detection system manufacturer's specifications.
- J. The Water Management Pond must be constructed in accordance with the liner installation methods included in Appendix 3 of the May 7, 2012 response to the request for additional data and as shown in Attachments 1.8 and 1.9 of the permit application engineer's drawings received June 29, 2012.
- K. The leak detection system must be monitored at least weekly and the permittee must maintain a record of when the liner and the leak detection system are inspected and the results of each inspection. This record shall include date of fluid level measuring, fluid level, volume of fluid removed and electric conductivity and chloride concentration of the fluids removed. This record must be maintained by the permittee for the life of the pond, and upon request of the Commission, the record shall be filed with the Commission.

- L. If the leak detection system indicates liner failure, the San Antonio District Office must be notified of that fact within 24 hours of detection of liner failure. Liner system failure is defined as any of the following:
1. A leak rate from the primary liner greater than 1,917 gallons per day.
 2. Any failure in the leak detection and return system or any component thereof.
 3. Any detected damage to or leakage from the secondary liner.
- M. If a liner system failure is detected, the affected component must be inspected for deterioration and leaks within 7 days of detection of liner failure. After inspection, the affected component must be replaced or repaired before use of the pond is resumed.
- N. No free oil may be allowed to accumulate on top of the waste stored in the pond. Any free oil on top of the waste must be skimmed off.
- O. Permit does not authorize discharge of waste from the pond to the surface or surface water. Waste may only be transferred to the injection well.
- P. Unless otherwise required by the conditions of this permit, construction, use, maintenance, and closure of the pond shall be in accordance with the information represented on the permit application and the attachments thereto.
- Q. Upon final cessation of the use of the Water Management Pond, the cell must be closed in accordance with Condition XIII.G of this permit. Any request to modify the closure plan must be filed with Technical Permitting. Upon final closure, Technical Permitting in Austin and the District Office shall be notified in writing.
- R. Technical Permitting in Austin and the San Antonio District Office must be notified in writing at least 45 days prior to commencement of closure activities.

XI. DISPOSAL CELL CONSTRUCTION AND OPERATION

- A. Technical Permitting in Austin and the San Antonio District Office must be notified in writing upon final completion of construction of a disposal cell. The permittee may not begin using the cell until the District Office has completed an inspection of the cell and provided written verification that the cell is constructed in accordance with the application and permit.
- B. A sign shall be posted identifying each Disposal Cell using letters and numerals at least one-inch in height.
- C. The capacity of the disposal cells may not exceed the following:
- Phase I – Disposal Cells 1 & 2 = 497,000 cubic yards
 - Phase II – Disposal Cell 3 = 558,000 cubic yards
 - Phase III – Disposal Cells 4 & 5 = 469,000 cubic yards

- D. This permit does not authorize the discharge of any oil and gas waste from a disposal cell.
- E. Unless otherwise required by the conditions of this permit, construction, use, maintenance, and closure of the cell shall be in accordance with the information represented on the permit application and the attachments thereto.
- F. Earthen berms shall be constructed to a minimum height of three feet and minimum width at the base of twelve feet surrounding each disposal cell to prevent storm water run-on and runoff.
- G. A liner anchor trench must be using to key the synthetic liner to the berm.
- H. Disposal Cells must be lined with a high-density polyethylene primary liner with a thickness of at least 60 mils and a high-density polyethylene secondary liner with a thickness of at least 60 mils.
- I. Disposal Cells must be equipped with a leak detection system, which will consist of a geonet (on the floor) and geocomposite (on the side slopes) placed between the primary and secondary liners.
- J. A geocomposite drainage layer shall be installed on top of the primary liner on the floor of the disposal cells which will convey any leachate to the leachate sumps for removal.
- K. Leachate collected in the leachate collection sump must be removed through the leachate removal pipe and disposed of in an authorized manner.
- L. The Disposal Cells must be constructed, and the liner/leak detection system must be installed, in accordance with sound engineering practices and liner/leak detection system manufacturer's specifications.
- M. The Disposal Cells must be constructed in accordance with the liner installation methods included in Appendix 3 of the May 7, 2012 response to the request for additional data and as shown in Attachment 1.5.1 through 1.5.3, Attachments 1.6.1 and 1.6.2, Attachments 1.7.1 through 1.7.3, and Attachments 1.9 of the permit application engineer's drawings received June 29, 2012.
- N. The leak detection system must be monitored at least weekly and the permittee must maintain a record of when the liner and the leak detection system are inspected and the results of each inspection. This record shall include date of fluid level measuring, fluid level, volume of fluid removed and electric conductivity and chloride concentration of the fluids removed. This record must be maintained by the permittee for the life of the cell, and upon request of the Commission, the record shall be filed with the Commission.
- O. If the leak detection system indicates a failure, the San Antonio District Office must be notified of that fact within 24 hours of detection of liner failure. Liner system failure is defined as any of the following:
 - 1. A leak rate from the primary liner greater than 4,865 gallons per day for Phase I (Disposal Cells 1 and 2).

2. A leak rate from the primary liner greater than 6,855 gallons per day for Phase II (Disposal Cell 3).
 3. A leak rate from the primary liner greater than 3,740 gallons per day for Phase III (Disposal Cells 4 and 5).
 4. Any failure in the leak detection and return system or any component thereof.
 5. Any detected damage to or leakage from the secondary liner.
- P. If liner system failure is detected, the affected component must be inspected for deterioration and leaks within 7 days of detection of liner failure. After inspection, the affected component must be replaced or repaired before use of the Disposal Cell is resumed.
- Q. No free oil may be allowed to accumulate on top of the waste stored in the disposal cell. Any free oil on top of the waste must be skimmed off.
- R. All waste shall pass the Paint Filter Test (EPA Method 9095) prior to disposal in a disposal cell. Test results from each Paint Filter Test must be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition I.I of this permit.
- S. No freestanding fluids may accumulate in a disposal cell. Any fluids must be removed within 72 hours of discovery and disposed of in an authorized manner.
- T. Upon final cessation of the use of a disposal cell, the cell must be closed in accordance with Condition XIII.H of this permit. Any request to modify the closure plan must be filed with Technical Permitting. Upon final closure, Technical Permitting in Austin and the District Office shall be notified in writing.
- U. Technical Permitting in Austin and the San Antonio District Office must be notified in writing at least 45 days prior to commencement of closure activities.

XII. ROADBASE RECYCLING AREA CONSTRUCTION AND OPERATION

- A. The Roadbase Recycling Area shall be constructed on a 3.71 acre portion of the facility (Roadbase Cell) shown on the site layout (Permit Appendix A).
- B. The Roadbase Recycling Area shall be surrounded by a compacted earthen berm. This berm shall be keyed into the underlying soil and shall be constructed to a height of two feet and width at the base of six feet and have a slope no steeper than 3H:1V.
- C. The floor will be graded to a slope ranging from 0.25% to 0.5%.
- D. No more than 5,000 tons of untreated waste and 20,000 tons of treated material may be stored in the Roadbase Recycling Area at any one time.
- E. Any emulsion material shall be stored in above ground steel tank(s) and shall be positioned within a bermed area.
- F. The cementing agent shall be stored in a bulk storage tank.

- G. Incoming waste must be unloaded and stockpiled in the oil & gas waste staging area.
- H. Waste shall be mixed/processed through a pug mill with appropriate amounts of coarse aggregate, cementing agent, and/or emulsion material.
- I. A sample of the partially treated waste shall be taken every 800 tons. All samples of the partially treated waste shall be analyzed for the following parameters:

PARAMETER	LIMITATION
Compressive Strength by Method Tex 126-E	35-psi minimum
SPLP by EPA Method 1312:	
Arsenic	<5.00 mg/l
Barium	<100.00 mg/l
Cadmium	<1.00 mg/l
Chromium (total)	<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
SPLP Leachate Test Method 1:4 Solid Solution:	
Chlorides	<700.0 mg/l
TPH	<100.0 mg/l
pH	Standard Units 6 to 12.49

- J. Any material not meeting the limitations in Permit Condition XII.I shall be returned to the mixing cycle and reprocessed or disposed of in a Diposal Cell.
- K. Processed material meeting the limitations listed in Permit Condition XII.I is suitable for use as roadbase material and may be used on facility roads or as roadbase off-site.
- L. Partially treated waste and recyclable product must be placed in separate stockpiles within the Roadbase Recycling Area.
- M. Stockpiles of partially treated waste shall be identified as such with a sign listing the lot number/sample identification number.
- N. The following records shall be kept at the facility for a period of three years from the date of removal for each load of recyclable product:

1. The date the recyclable product is removed from the facility or if used on-site, the area of the facility where the product was used.
 2. The volume of recyclable product removed from or used at the facility.
 3. The identification of the recipient.
 4. Documentation that the lease operator of the oil/gas lease has approved the use of the recyclable product on the lease roads.
 5. Documentation that the landowner of the receiving location has approved the use of the recyclable product on the landowner's roads if used on private roads.
 6. Documentation that the recyclable product has met the specifications required by the final user.
 7. Documentation indicating the approximate location where the recyclable product is used.
- O. Copies of analyses demonstrating that the recyclable product has met the limitations in Permit Condition XII.I shall be submitted to Technical Permitting as part of the Semiannual Report required in Condition I.I. of this permit.
- P. Quarterly confirmation soil sampling will be conducted in areas where waste material has been stockpiled. Soil samples will be collected from a depth of 0 to 1 foot and analyzed for TPH.
- Q. If the sample's TPH concentration exceeds 1%, the area around the sample location will be excavated. Additional soil sampling and removal will continue in 6-inch depth increments until all of the contaminated soil with TPH concentrations exceeding 1% have been removed from that area. Clean fill shall be used to backfill any excavation.
- R. A summary of the soil sampling analysis and a map showing sample locations shall be submitted to Technical Permitting as part of the Semiannual Report required in Condition I.I. of this permit.

XIII. CLOSURE OF THE SITE

- A. All waste must be processed through the facility or disposed of in an authorized manner.
- B. The facility shall be closed and restored to natural grade as shown on Attachment 1.10.1 of the permit application engineer's drawings received June 29, 2012.
- C. Closure of the Receiving Area shall proceed as follows:
 1. The contents of all tanks, vessels, or other containers shall be disposed of in an authorized manner.
 2. All equipment shall be removed and salvaged, if possible, or disposed of in an authorized manner.

3. All concrete pads and vaults shall be demolished and the rubble disposed of in an authorized manner.
4. Affected soils underlying the concrete pads/vaults shall be removed and disposed of in an authorized manner.
5. One representative soil sample shall be obtained from Areas I, II, and III in the Receiving Area. The soil samples shall be analyzed for the constituents listed in Condition XIII.I of this permit and the constituent levels shall not be exceeded.
6. A map showing the sampling locations and copies of the analysis required by Condition XIII.I. shall be submitted to Technical Permitting in Austin. When acceptable constituent levels have been verified in writing by Technical Permitting, the Receiving Area will be backfilled with clean fill and restored to natural grade. Topsoil shall then be contoured and seeded with appropriate vegetation.

D. Closure of the Thermal Desorption Area shall be as follows:

1. The contents of all tanks, vessels, or other containers shall be disposed of in an authorized manner.
2. All equipment shall be removed and salvaged, if possible, or disposed of in an authorized manner.
3. Base material shall be removed and disposed of in an authorized manner.
4. One representative soil sample shall be obtained from the Thermal Desorption Area and be analyzed for the constituents listed in Condition XIII.I of this permit and the constituent levels shall not be exceeded.
5. A map showing the sample location and copies of the analysis required by Condition XIII.I shall be submitted to Technical Permitting in Austin. When acceptable constituent levels have been verified in writing by Technical Permitting, the Thermal Desorption Area will be restored to natural grade. Topsoil shall be contoured and seeded with appropriate vegetation.

E. Closure of the Truck Washout Area shall be as follows:

1. The contents of all tanks, vessels, or other containers shall be disposed of in an authorized manner.
2. All equipment shall be removed and salvaged, if possible, or disposed of in an authorized manner.
3. All concrete pads shall be demolished and the rubble disposed of in an authorized manner.

4. Affected soils underlying the concrete pads shall be removed and disposed of in an authorized manner.
5. One representative soil sample shall be obtained from the Truck Washout Area and be analyzed for the constituents listed in Condition XIII.I of this permit and the constituent levels shall not be exceeded.
6. A map showing the sample location and copies of the analysis required by Condition XIII.I shall be submitted to Technical Permitting in Austin. When acceptable constituent levels have been verified in writing by Technical Permitting, the Truck Washout Area will be restored to natural grade. Topsoil shall be contoured and seeded with appropriate vegetation.

F. Closure of the Staging Cells shall be as follows:

1. All waste must be removed from each Staging Cell and disposed of in an authorized manner.
2. One foot of the compacted clay liner shall be excavated and disposed of in an authorized manner.
3. One representative soil sample shall be obtained from each Staging Cell and be analyzed for the constituents listed in Condition XIII.I of this permit and the constituent levels shall not be exceeded.
4. A map showing the sample locations and copies of the analysis required by Condition XIII.I shall be submitted to Technical Permitting in Austin. When acceptable constituent levels have been verified in writing by Technical Permitting, the Staging Cells will be backfilled with clean fill and restored to natural grade. Topsoil shall be contoured and seeded with appropriate vegetation.

G. Closure of the Water Management Pond shall be as follows:

1. All waste must be removed from the Water Management Pond and disposed of in an authorized manner.
2. The synthetic liner shall be removed and disposed of in an authorized manner.
3. Five representative soil samples shall be obtained from the Water Management Pond and be analyzed for the constituents listed in Condition XIII.I of this permit and the constituent levels shall not be exceeded.
4. A map showing the sample locations and copies of the analysis required by Condition XIII.I shall be submitted to Technical Permitting in Austin. When acceptable constituent levels have been verified in writing by Technical Permitting, the Water Management Pond shall be backfilled with

clean fill and restored to natural grade. Topsoil shall be contoured and seeded with appropriate vegetation.

H. Closure of the Disposal Cells shall be as follows:

1. Once a disposal cell has achieved its capacity, the cell will be covered with a cap and closed in accordance with construction details shown in Attachments 1.10.1 through 1.10.3 of the permit application engineer's drawings received June 29, 2012. The cap will be seeded with appropriate vegetation.

I. Soil samples shall be analyzed and the following constituent levels shall not be exceeded:

Constituent (units)	Closure Limit
pH (s.u.)	6.0 to 10.0
Electrical Conductivity (EC)	4.0
TPH (mass %)	<1
BTEX (mg/kg)	30.0
Metals (mg/kg):	
Arsenic	10.0
Barium	10000.0
Cadmium	10.0
Chromium	100.0
Lead	200.0
Mercury	10.0
Selenium	10.0
Silver	200.0

XIV. POST-CLOSURE CARE AND MONITORING:

- A. The site will be monitored for a period of no less than five years after closure of the facility.
- B. Post-closure care shall include the quarterly inspections of the entire facility by a registered professional engineer for signs of deterioration.
- C. Any areas showing signs of erosion shall be contoured and backfilled or reseeded.

- D. The leak detection systems and the leachate collection systems shall be maintained and monitored quarterly. Any leachate detected shall be pumped out and disposed of in an authorized manner.
- E. A summary of the results of the post-closure monitoring activity shall be submitted to Technical Permitting in Austin as part of the Semiannual Report required in Condition I.I of this permit.
- F. The permittee must request in writing permission to cease post-closure monitoring. Post-closure monitoring requirements may be extended by Technical Permitting based on the monitoring results.

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



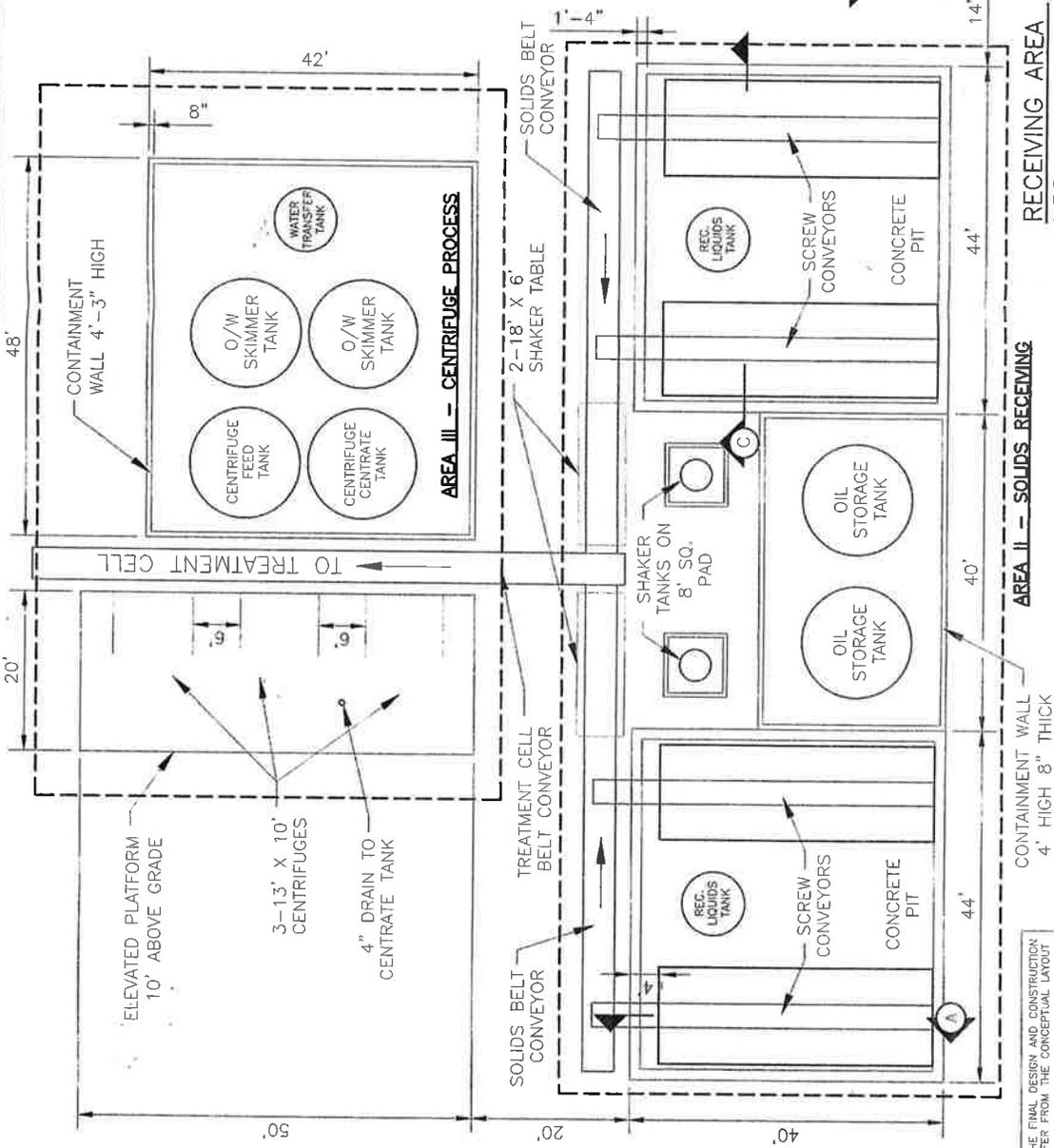
Michael Sims, P.E. Manager
Environmental Permits and Support
Technical Permitting

Note:

1. This permit supersedes the permit issued to R-360 Environmental Solutions on August 9, 2012 and changes the name to US Liquids of LA, L.P.

RECEIVING AREA

TANK	# OF UNITS	VOLUME/TANK (BBL)	TOTAL VOLUME (BBL)
O/W SKIMMER TANK	2	950	1,900
OIL STORAGE	2	420	840
CENTRIFUGE CENTRATE	1	300	300
CENTRIFUGE FEED	1	300	300
RECEIVING BOX	4	450	1,800
RECEIVING LIQUIDS	2	90	180
CONCRETE PIT	2	3,880	7,760
LIQUID RECEIVING TANKS	4	500	2,000
SHAKER TANKS	2	12	24
WATER TRANSFER TANK	1	300	300

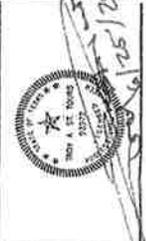


RECEIVED
RRG OF TEXAS
11/14/2012
ORIG
ALBUQUERQUE

PERMIT NO. STF-038
PERMIT APPENDIX B

NOTE: FOR ALL SECTIONS SEE SHEET 2.8

NOTE: THE FINAL DESIGN AND CONSTRUCTION MAY DIFFER FROM THE CONCEPTUAL LAYOUT SHOWN.

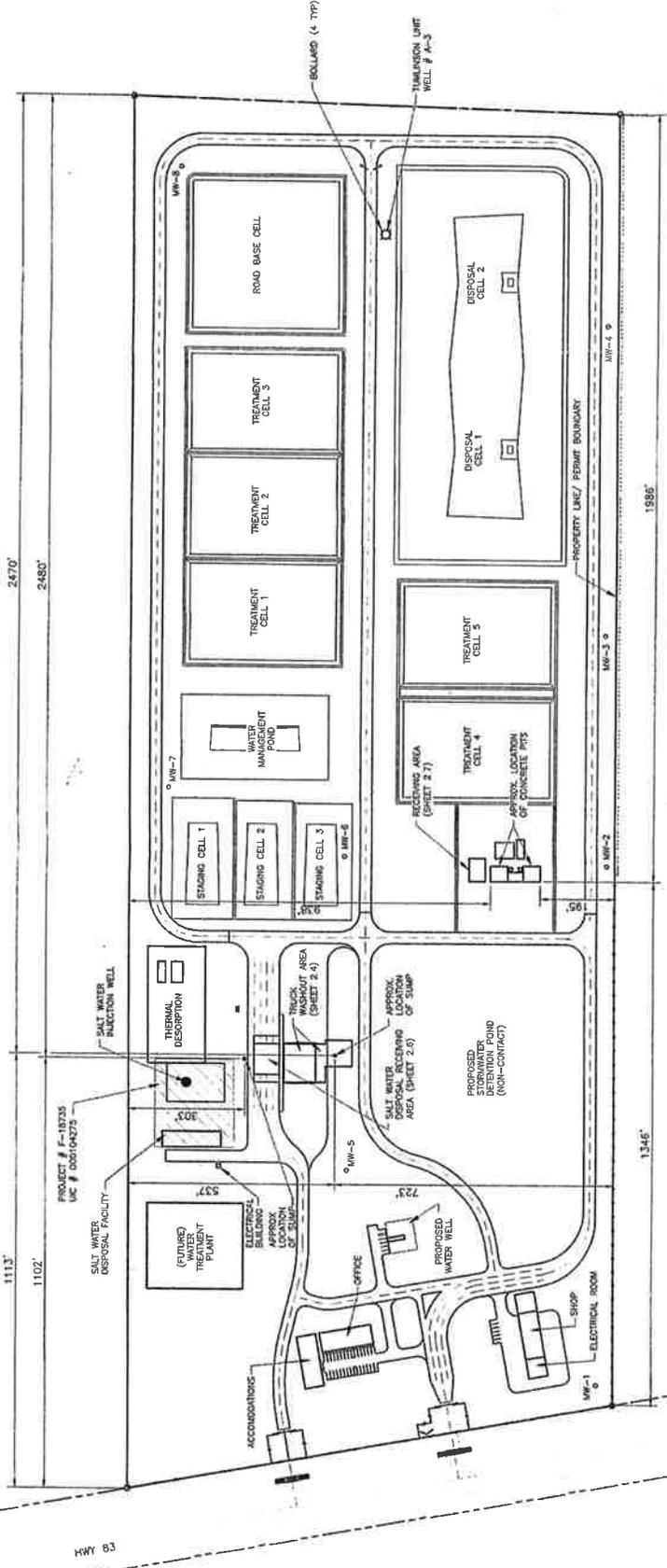


PROJECT MANAGER	A. STOUPS
DESIGNED BY	P. NEVELL
DRAWN BY	C. AMBUL
CHECKED BY	
PROJECT DATE	
PROJECT NUMBER	1000000001-9724

ISSUE	DATE	DESCRIPTION
03	04/25/2013	NEPAL SUBMITTAL
02	03/03/2013	ISSUED FOR PERMIT
01	03/02/2013	ISSUED FOR CONSTRUCTION



FILE NAME	RRG-VOLUME-214
SCALE	NOT TO SCALE
SHEET	2.7



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 RRC OF TEXAS
 JULY 29 2012

STATE
 AUTHORITY

PERMIT NO. STF-038
 PERMIT APPENDIX A

**EAGLE FORD WEST FACILITY
 DIMMIT COUNTY, TEXAS
 SITE LAYOUT**

FILE NAME: EOP-WEST-FACILITY.dwg
 SCALE: 1" = 150'

2.1

A360
 ENVIRONMENTAL
 SOLUTIONS

**EAGLE FORD - WEST FACILITY
 CATARINA, TEXAS**

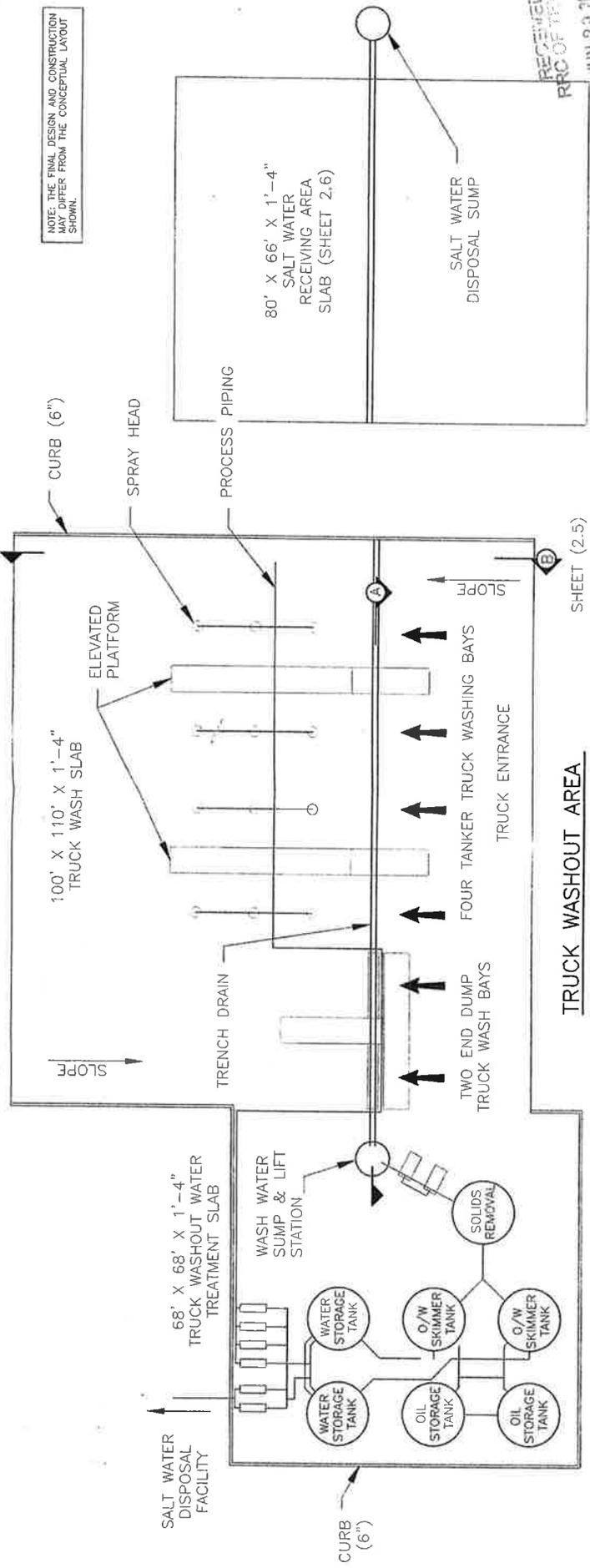


PROJECT MANAGER	A. STUBBS
DESIGNED BY	P. REWELL
DRAWN BY	C. AMUND
CHECKED BY	
PROJECT DATE	
PROJECT NUMBER	00000000125

ISSUE	DATE	DESCRIPTION
02	06/25/2012	PERMIT SUBMITAL
01	04/10/2012	ISSUED FOR PERMIT REVIEW

HR
 HDR Engineering, Inc.
 1000 P.O. Box
 Registration No. A-794

NOTE: THE FINAL DESIGN AND CONSTRUCTION MAY DIFFER FROM THE CONCEPTUAL LAYOUT SHOWN.



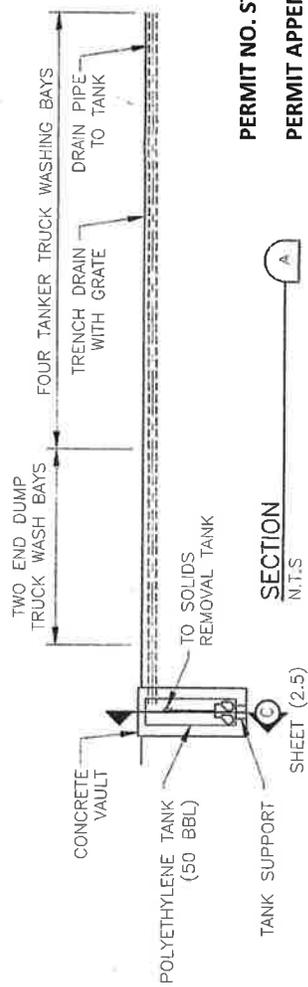
TRUCK WASHOUT AREA
N.T.S.

RECEIVED
PRC OF TEXAS
JUN 29 2012
AUSTIN TX

NOTE: ALL CONCRETE SLABS WILL INCLUDE REINFORCING STEEL. STEEL REINFORCING SIZING AND PLACEMENT WILL BE DETERMINED IN THE FINAL DESIGN.

TRUCK WASHOUT AREA

TANK	# OF UNITS	VOLUME/TANK (BBL)	TOTAL VOLUME (BBL)
OIL STORAGE	2	420	840
O/W SKIMMER TANK	2	950	1,900
WASHWATER STORAGE	2	500	1,000
WASHWATER SUMP	1	50	50
SOLIDS REMOVAL	1	500	500



PERMIT NO. STF-038
PERMIT APPENDIX C

SECTION A-A
N.T.S.

EAGLE FORD WEST FACILITY
DIMMIT COUNTY, TEXAS
TRUCK WASHOUT AREA

PROJECT MANAGER: A. STIVERS
DESIGNED BY: P. JENELL
DRAWN BY: C. AMMOL
CHECKED BY:
PROJECT DATE:
PROJECT NUMBER: 100000009312712

03 09/25/2012 PERMIT SUBMITTAL
02 03/03/2012 ISSUED REVISED
01 03/02/2012 ISSUED FOR REVIEW
NOT FOR CONSTRUCTION

EAGLE FORD - WEST FACILITY
CATARINA, TEXAS

FILENAME: ESRP-RES-DRWG-24.dwg
SCALE: NOT TO SCALE

SHEET 2.4