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# Audit Handbook

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 TM Corpus Christi Services LLC  
6901 Greenwood Drive, Corpus Christi, Texas 78415

October 16, 2020

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

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## **TM CORPUS CHRISTI SERVICES LLC AUDIT HANDBOOK**

### **1.0 GENERAL INFORMATION**

Facility Name	TM Corpus Christi Services LLC
Physical Address	6901 Greenwood Drive Corpus Christi, Texas 78415
EPA Identification No.	TXR000001016
TCEQ Solid Waste Registration No.	83093
Facility Phone No.	(361) 852-8284
Facility Fax No.	(361) 852-3167

TM Corpus Christi Services LLC offers hazardous and non-hazardous waste treatment, storage, and disposal services centered on the facility's on-site deepwell.

### **2.0 FACILITY AUTHORIZATIONS**

#### **2.1 Permits**

See Permit Table 2.1 for a list of existing permits and expiration dates. Attachment 2.1 contains the cover pages for the permits listed in Table 2.1. If a permit is undergoing renewal with the authorizing agency, a copy of the transmittal letter for the renewal application can be found in Attachment 2.1, also.

#### **2.2 Facility History**

The facility was originally owned by Petrolite Chemical and operated by International Pollution Control (IPCI). IPCI's primary function was oil recovery. Deepwell disposal was used as an alternative to surface discharge when the water quality discharge parameters were not met. The initial Underground Injection Control (UIC) permit was granted December 2, 1969.

Significant demand for disposal capacity for commercial industrial waste encouraged IPCI to request a permit amendment to increase their rate of flow to the deepwell. The WDW-70 permit was amended and approved on April 9, 1979 to a maximum flow rate of 150 gallons per minute (gpm) at 750 pounds per square inch (psi) surface pressure.

IPCI was purchased by Chemical Waste Management, Inc. (CWM), on February 26, 1980, although CWM took over operations on January 1, 1980. CWM constructed landfills on-site to dispose of on-site generated waste. Landfill activities started in late 1980 and were concluded on January 26, 1983. In 1981, a recovery trench was

installed by CWM to capture and recover contaminated groundwater from the operation of these units and to minimize any release from the facility.

In 1987 and 1988, concrete secondary containment was installed in the tank, well, and process areas, a three-bay truck off-loading area was constructed and many of the existing tanks were removed and replaced. In 1990, the drum storage building (DSB) was constructed.

The original Part B permit was issued June 23, 1987. The original No Migration Petition (NMP) was issued April 23, 1990.

CWM transferred ownership of the RCRA, UIC, and NMP permits, and the operation of the storage/process tanks, process equipment, truck unloading area, DSB, laboratory, deepwell, and the office and maintenance buildings associated with the 14.273 acre tract to Disposal Systems of Corpus Christi, Inc. (DSICC) on March 10, 1995. CWM retained ownership of the closed landfills and associated areas including the recovery trench area. CWM has the responsibility to continue to maintain these portions of the facility, the associated post-closure care, corrective action measures, and the associated financial assurance requirements. CWM also retained, as part of the acquisition by DSICC all liability associated with the landfill operations, past, present, and future.

The assets of DSICC was purchased by TM Corpus Christi Services LLC (TMCC) on September 20, 2001.

### **2.3 Authorizing Agency Contacts**

TCEQ  
IHW Permits Section (MC-130)  
Attn: Ms. Joy Archuleta  
P.O. Box 13087  
Austin, Texas 78711

(512) 239-6614

TCEQ – Region 14  
Attn: Tim Perdue, Waste Section Manager  
NRC Bldg, Suite 1200  
6300 Ocean Dr, Unit 5839  
Corpus Christ, Texas 78412

(361) 825-3100

## **3.0 SITE DESCRIPTION**

### **3.1 Facility Location**

TMCC is located on a 14.273 acre site at 6901 Greenwood in Corpus Christi, Texas.

### **3.2 Land Use**

The area is largely industrialized, and the nearest neighborhood lays approximately 1/2 of a mile to the North.

### **3.3 Flood Zone**

The facility is outside the One-Hundred Year Floodplain. The nearest body of water is La Volla Creek which borders the western facility boundary.

### **3.4 Security**

The facility is enclosed by a six (6) foot hurricane fence. Entrance is through the scale house gate that is manned during business hours. All gates are locked and under video surveillance while the facility is closed.

## **4.0 WASTE MANAGEMENT SERVICES**

### **4.1 Staffing**

TMCC has a staff of five employees. Technical support staff is provided by TM Deer Park Services LLC (TMDP), located in Deer Park, Texas and is composed of environmental, safety and deepwell professionals.

### **4.2 Waste Management Options**

Current facility operations consist of storage in tanks and containers, filtration, and deepwell disposal. TMCC receives waste at the facility largely in tanker trucks; roll-off containers and drums can also be accepted. TMCC handles a variety of aqueous and water-soluble wastes from weak acids to strong caustics. The facility can also handle liquids with higher solids content through its filter press system. Waste acceptance is discussed further in Section 5.0.

Disposal of received wastes is via the on-site Class 1 injection well. The deepwell is 4,700 feet deep and is exempt from the land ban regulations (see Attachment 2.1). The deepwell is required to undergo a Mechanical Integrity Test (MIT) annually which consists of reservoir pressure fall-off, radioactive tracer, and annulus pressure testing. Approval of the latest MIT report by the TCEQ can be found in Attachment 4.1.

### **4.3 Transportation**

Transporters hauling wastes to TMCC are pre-approved before entry into the site, provided they have the proper registrations and insurance coverage. Transportation companies can be approved by submitting an Inbound Transporter Qualification Form (see Attachment 4.2).

### **4.4 Storage Facilities**

TMCC has 14 RCRA-permitted tanks with a combined storage capacity of approximately 902,000 gallons. In addition, the RCRA permit allows storage of up to 27,147 gallons of containerized wastes.

## **5.0 WASTE STREAM APPROVAL & RECEIPT**

### **5.1 Waste Analysis Plan**

A copy of the facility's Waste Analysis Plan (WAP) can be found in Attachment 5.1. Sections 5.1 through 5.5 of this handbook summarizes the WAP.

### **5.2 Waste Approval**

If an inquiry from a potential client indicates that the waste stream is potentially acceptable by the facility, the customer typically provides a pre-acceptance sample along with relevant paperwork to TMCC. Relevant paperwork includes a waste profile, at a minimum. For hazardous wastes, a Land Disposal Restriction Notification (LDRN) may also be submitted for review prior to approval. TMCC's waste profile document and LDRN can be found in Attachment 5.2.

The pre-acceptance sample is analyzed by the TMCC on-site laboratory to confirm compliance with safety and regulatory requirements, and to determine waste handling procedures.

TMCC reviews the waste profile form and any supporting documents (e.g., laboratory analysis, safety data sheets, etc.) for technical adequacy. The review addresses: i) environmental and permit compliance; ii) treatability and handling; and iii) health and safety issues. Errors or omissions discovered during the review process are resolved through contact with the customer.

### **5.3 Scheduling & Shipping**

Once a stream is approved and a Sales and Pricing Agreement is executed, the customer may contact our customer service department for scheduling. At the time of shipment, the generator is required by law to present a properly completed manifest or shipping paper, and possibly a LDRN (40 CFR 262 Subpart A and 40 CFR 268.7), depending on the waste's regulatory classification.

### **5.4 Waste Receipt & Analysis**

Upon receipt, a computer database and tracking system is utilized to confirm the load and assure regulatory compliance. A fingerprint analysis of the truckload of waste is run and compared against the profiled characteristics for any discrepancies. TMCC will resolve discrepancies with the customer. Once confirmed, the truck or drum is accepted for processing. The EPA codes are tracked through the subsequent processes and disposal.

### **5.5 Waste Residuals**

Residual solids and media are sent off-site for disposal or further waste management at a RCRA-permitted facility. Liquid organics are typically sent for fuel blending. A list of TMCC-audited and approved off-site facilities is included as Attachment 5.3.

## **6.0 COMPLIANCE & SAFETY PERFORMANCE**

### **6.1 Employee Training Program**

Training Programs are developed by the TMCC Environmental, Health, and Safety (EHS) Department. All operations personnel receive a minimum of twenty-four (24) hours HAZWOPER training. An annual eight (8) hour HAZWOPER refresher course is mandatory and safety meetings are held daily. Additionally, operators receive annual environmental training which covers facility permits and associated plans. The training programs are developed and conducted by the facility's Environmental and Safety professionals, or by third-party contractors. The programs are constantly updated and are tailored specifically to TMCC's needs.

### **6.2 Safety & Industrial Hygiene**

The EHS Department has developed and implemented programs designed to provide maximum protection for company employees. Personnel monitoring and medical surveillance programs, along with sound work practices, ensure a safe working environment. Daily safety meetings reinforce training and awareness. TMCC's latest experience moderator rate (EMR) and last three years' OSHA 300A logs can be found in Attachments 6.1 and 6.2, respectively.

### **6.3 Inspections**

As a RCRA facility, TMCC has an extensive internal inspection/audit program. Inspections are conducted daily, weekly, monthly, quarterly and annually by facility staff or the EHS Department.

### **6.4 Contingency Plan**

A TCEQ-approved Contingency Plan has been developed in the event an emergency is declared. Local authorities including police, fire fighters, and other potential responders have been provided with a copy of the plan.

### **6.5 Regulatory Investigations**

As a highly-regulated facility, TMCC is investigated regularly by regulatory agencies, such as the TCEQ. A copy of investigation findings from all regulatory agencies from the last five years can be found in Attachment 6.3. The TCEQ's Compliance Rating for the facility is currently 0. A rating of 0 to 0.1 is considered "high" performance, 0.1 to 55 is considered "satisfactory" performance, and over 55 is considered "unsatisfactory."

## **7.0 FINANCIAL RESPONSIBILITY**

### **7.1 Insurance**

In addition to general liability, automobile liability and worker's compensation, TMCC maintains maximum coverage for environmental impairment liability insurance. An

example certificate of insurance and the endorsement for liability coverage is included as Attachment 7.1.

## **7.2 Financial Assurance**

RCRA and UIC Closure Cost estimates are reviewed when the facility adds or removes units. The latest closure plan can be found in Attachment 7.2. TMCC has established a Surety Bond to provide financial responsibility for facility closure. See Attachment 7.3 for the facility's current financial assurance documentation.

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**TABLES**

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Table 2.1    Permit Table

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**TABLE 2.1  
PERMIT TABLE**

<b><u>PERMIT NAME</u></b>	<b><u>PERMIT NUMBER</u></b>	<b><u>EXP. DATE</u></b>	<b><u>AUTHORITY</u></b>
UIC Deepwell (Active)	WDW-070	9/21/2019 <sup>1</sup>	TCEQ
RCRA Part B	50372	8/14/2030	TCEQ
State Facility Registration	83093	-----	TCEQ
RCRA ID Number	TXR000001016	-----	US EPA Region 6
LDR No Migration Exemption	-----	12/31/2028	US EPA Region 6
Storm Water	TXR05U691	8/14/2021	TCEQ

NOTE: The following information is offered as verification of permit authority and may not include permit details. Complete permit files may be reviewed in our office.

<sup>1</sup> Renewal application submitted to the TCEQ on March 19, 2019; is currently undergoing technical review.

**TM CORPUS CHRISTI SERVICES LLC  
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**ATTACHMENTS**

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**TM CORPUS CHRISTI SERVICES LLC  
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**ATTACHMENT 2.1  
PERMIT COVER SHEETS**

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Texas Commission on  
Environmental Quality  
Austin, Texas

Permit No. WDW070  
This permit supersedes and replaces  
Permit No. WDW070 issued  
June 5, 1998

Permit To Conduct  
Class I Underground Injection  
under Provisions of Texas Water Code,  
Chapter and 27 and Texas Health and Safety  
Code Chapter 361

I. Permittee

TM Corpus Christi Services Limited Partnership  
P.O. Box 7809  
Corpus Christi, TX 78467

II. Type of Permit

Initial \_\_\_\_\_ Renewal  X  Amended \_\_\_\_\_  
Commercial  X  Noncommercial  X   
Hazardous  X  Nonhazardous  X   
Onsite  X  Offsite  X   
Authorizing Disposal of Waste from Captured Facility \_\_\_\_\_  
Authorizing Disposal of Waste from Off-site Facilities Owned by Owner/Operator \_\_\_\_\_

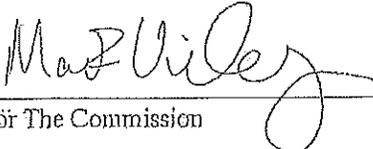
III. Nature of Business

Commercial hazardous and nonhazardous waste storage, processing, and disposal well facility.

CONTINUED on Pages 2 through 6

The permittee is authorized to conduct injection in accordance with limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules and orders of the Commission, and the laws of the State of Texas. The permit will be in effect for ten years from the date of approval or until amended or revoked by the Commission. If this permit is appealed and the permittee does not commence any action authorized by this permit during judicial review, the term will not begin until judicial review is concluded.

ISSUED: September 21, 2009

  
\_\_\_\_\_  
For The Commission



TM Corpus Christi Services Limited Partnership

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March 19, 2019

Lorrie Council, P.G  
Manager  
UIC Permits Section, MC-233  
Texas Commission on Environmental Quality  
12100 Park 35 Circle  
Austin, Texas 78753

**Re: UIC Permit Renewal Application  
TM Corpus Christi Services Limited Partnership, Corpus Christi, Texas  
UIC Permit No.: WDW-070  
Industrial Solid Waste Registration No. 83093  
EPA ID No. TXR000001016**

Dear Ms. Council,

TM Corpus Christi Services Limited Partnership (TMCC) is hereby submitting a renewal application for UIC Permit No. WDW-070.

Please find enclosed one original and two copies of the application materials requested by the TCEQ application form as summarized below:

- A copy of the check for payment of the application fee;
- Pre-printed mailing labels for adjacent landowners and mineral rights owners;
- An updated UIC permit application form; and
- Additional information requested by Sections II-XIII of the application.

Should you have any questions concerning this document, please contact me at 281-930-2593.

Sincerely,

Christina Perez  
Director - EHS

Enclosures

cc: Environmental Services, Oil and Gas Division, Railroad Commission of Texas, Austin, Texas  
Brandon Schulte, P.E., WSP, Houston, Texas



Hazardous Waste Permit No. 50372  
EPA ID. No. TXR000001016  
ISWR No. 83093

**Texas Commission on  
Environmental Quality  
Austin, Texas**

Permit for Industrial Solid Waste  
Management Site issued under  
provisions of Texas Health and Safety  
Code ANN. Chapter 361 and Chapter 26  
of the Texas Water Code

Name of Permittee: TM Corpus Christi Services, LLC  
6901A Greenwood Drive  
Corpus Christi, Texas 78415

Site Owner: TM Corpus Christi Services, LLC  
6901A Greenwood Drive  
Corpus Christi, Texas 78415

Classification of Site: Hazardous and Nonhazardous Class 1, Class 2 and  
Class 3 industrial solid waste, on-site/off-site  
storage and processing, commercial facility.

The permittee is authorized to manage wastes in accordance with the limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission, and laws of the State of Texas. This permit does not exempt the permittee from compliance with the Texas Clean Air Act. This permit will be valid until canceled, amended, modified or revoked by the Commission, except that the authorization to store, process and dispose of wastes shall expire midnight, ten (10) years after the date of this renewal permit approval. This permit was originally issued on September 25, 1998, and subsequently renewed on November 23, 2009.

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (\*) stem from Federal authority and will implement the applicable requirements of Hazardous and Solid Waste Amendments of 1984 (HSWA) for which the Texas Commission on Environmental Quality has not been authorized.

Issued Date: August 13, 2020

  
\_\_\_\_\_  
For the Commission



ACKNOWLEDGEMENT OF NOTIFICATION  
OF REGULATED WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA ID. NUMBER

INSTALLATION ADDRESS

TX 00000001016 06/09/95  
DISPOSAL SYSTEMS OF CO., INC.  
PO BOX 1917  
DEER PARK TX 77530  
STATE OF TEXAS ENVIRONMENTAL AGENCY  
6901 GALENHUDD RD. BLDG. 7  
CORPUS CHRISTI, TX 78411



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

NOV 19 2018

CERTIFIED MAIL 7004 1160 0003 0358 5375 RETURN RECEIPT REQUESTED

Ms. Christina Perez  
EHS Manager  
TM Corpus Christi Services L.P.  
P.O. Box 1914  
Deer Park, TX 77536

RE: TM Corpus Christi Services L.P. (TMCC)  
Petition Reissuance Final Approval Decision for WDW-70

Dear Ms. Perez,

The land disposal restrictions prohibit the injection of hazardous waste unless a petitioner can demonstrate to EPA, to a reasonable degree of certainty, that there will be no migration of hazardous constituents from the injection zone for as long as the wastes remain hazardous. The land disposal restrictions for injection wells codified in 40 CFR Part 148 provide the standards and procedures by which petitions to dispose of an otherwise prohibited waste by injection will be reviewed and by which exemptions pursuant to these petitions will be granted or denied. Part 148 also provides for the reissuance of an exemption if the reissuance complies with the above-mentioned standards.

A letter dated August 21, 2018, informed TMCC that EPA was proposing to approve its petition reissuance request for an exemption to the land disposal restrictions. The public comment period associated with this decision began on August 28, 2018, and closed on October 15, 2018, and no comments were received.

Based on a detailed technical review of the petition reissuance request and support documents, EPA has determined that this information for the TMCC site meets the requirements of 40 CFR Part 148 by demonstrating that, to a reasonable degree of certainty, there will be no migration of hazardous constituents from the injection zone for 10,000 years.

The following are conditions of this land disposal restrictions exemption.

Petition Reissuance Final Approval Conditions

This final approval of a petition for reissuance of an exemption to allow the injection of restricted hazardous wastes is subject to the following conditions, which are necessary to assure that the standard in 40 CFR § 148.20 (a) is met. Noncompliance with any of these conditions is grounds for termination of the exemption in accordance with 40 CFR § 148.24(a)(1). This exemption is applicable to the TMCC injection well WDW-70, located at the Corpus Christi, Texas facility.



**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
**Texas Pollutant Discharge Elimination System**  
**Stormwater Multi-Sector General Permit**

The Notice of Intent (NOI) for the facility listed below was received on November 11, 2016. The intent to discharge stormwater associated with industrial activity under the terms and conditions imposed by the Texas Pollutant Discharge Elimination System (TPDES) stormwater multi-sector general permit TXR050000 is acknowledged. Your facility's TPDES multi-sector stormwater general permit authorization number is:

**TXR05U691**

Coverage Effective: February 21, 2007

Sector: K Primary SIC code: 4953

TCEQ's stormwater multi-sector general permit requires certain stormwater pollution prevention and control measures, possible monitoring and reporting, and periodic inspections. Among the conditions and requirements of this permit, you must have prepared and implemented a stormwater pollution prevention plan (SWP3) that is tailored to your industrial site. As a facility authorized to discharge under the stormwater multi-sector general permit, all terms and conditions must be complied with to maintain coverage and avoid possible penalties.

**Project/Site Information:**

RN102977535  
Tm Corpus Christi Service  
6901A Greenwood Dr  
Corpus Christi, TX 78415  
Nueces County

**Operator:**

CN601522477  
Tm Corpus Christi Services Limited Partnership  
6901 Greenwood Dr  
Corpus Christi, TX 78415

This permit expires on August 14, 2021, unless otherwise amended. If you have any questions related to processing, you may contact the Stormwater Processing Center by email at [swpermit@tceq.texas.gov](mailto:swpermit@tceq.texas.gov) or by telephone at (512) 239-3700. For technical issues, you may contact the stormwater technical staff by email at [swgp@tceq.texas.gov](mailto:swgp@tceq.texas.gov) or by telephone at (512) 239-4671. Also, you may obtain information on the TCEQ web site at [http://www2.tceq.texas.gov/wq\\_dpa/index.cfm](http://www2.tceq.texas.gov/wq_dpa/index.cfm). A copy of this document should be kept with your SWP3.

A handwritten signature in black ink, appearing to read "R. A. Hylb".

FOR THE COMMISSION

Issued Date: November 11, 2016

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 4.1  
ANNUAL MECHANICAL INTEGRITY REPORT APPROVAL**

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Jon Niermann, *Chairman*  
Emily Lindley, *Commissioner*  
Bobby Janecka, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 14, 2019

Ms. Christina Perez  
Environmental Manager  
TM Corpus Christi Services, Limited Partnership  
6901 Greenwood Drive  
Corpus Christi, Texas 78415

Re: Approval of 2019 Mechanical Integrity Testing and Reservoir Pressure Testing for TM Corpus Christi Services, LP, Corpus Christi (Nueces County), Texas  
Regulated Entity No.: 102977535; TCEQ ID No.: WDW-070; Investigation No.: 1609571

Dear Ms. Perez:

This is to acknowledge receipt of the report entitled "2019 Annual and Five-Year Mechanical Integrity Testing and Reservoir Pressure Testing of WDW-070" prepared by Strata Technologies, LLC dated October 30, 2019. It has been determined from review of the MIT report, and from observation of the testing, that mechanical integrity of this well was confirmed, in accordance with 30 TAC § 331.43(a), by an annulus pressure test, a radioactive tracer survey, and a differential temperature survey conducted on October 9-10, 2019. Please keep a copy of this letter with the waste disposal well records so that it may be available for review by TCEQ staff during investigations.

We also acknowledge receipt of the reservoir pressure testing report included with the MIT report. You may be contacted by our staff, or the U.S. Environmental Protection Agency Region 6, if there are any questions or comments on the static bottom hole pressure testing.

If you have any questions regarding this matter, please contact Mr. Heitzenrater at the Corpus Christi Region Office at (361) 825-3125.

Sincerely,

  
Timothy C. Perdue, CHMM  
Waste Section Manager  
Corpus Christi Region Office

TCP/RH/mjc

cc: Mr. Jose Torres, EPA Region 6, 6WQ-s  
Ms. Catherine Skurow, TM Corpus Christi Services, Limited Partnership  
Mr. Mike Johnson, Strata Technologies, LLC, Austin, TX

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 4.2  
INBOUND TRANSPORTER QUALIFICATION FORM**

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**TM Corpus Christi Services Limited Partnership  
Inbound Transporter Qualification Form**

**I. Requirements**

- A. Return form in Section II. Transporter Information; and
- B. Submit the following to [kgreen@texasmolecular.com](mailto:kgreen@texasmolecular.com):

<b>Insurance Requirements</b>	
<b>Type</b>	<b>Minimum Limits of Liability</b>
Commercial General Liability	\$ 1,000,000 - Each Occurrence
	\$ 2,000,000 - General Aggregate
Automobile Liability	\$ 1,000,000 - Combined Single Limit; <b>or</b> \$ 5,000,000 - Combined Single Limit (if Excess/Umbrella is not met)
Excess/Umbrella Liability	\$ 4,000,000 - Aggregate
Worker's Compensation & Employer's Liability	\$ 1,000,000 - Each Accident
	\$ 1,000,000 - Disease Policy Limit
<b>Additional Special Provisions:</b>	
1) Additional insured in favor of <b>TM Corpus Christi Services LP</b> (for General Liability and Automobile).	
2) Waiver of Subrogation in favor of <b>TM Corpus Christi Services LP</b> (for General Liability, Automobile, and Worker's Compensation).	
3) <i>Requested, but not required:</i> Alternative Employer Endorsement in favor of <b>TM Corpus Christi Services LP</b> (for Worker's Compensation).	

**II. Transporter Information:**

Company Name:	
DBA Name:	
Physical Address:	
Mailing Address:	
City, State, Zip:	
24-Hr/Dispatch Phone:	
Contact Name:	
Texas Solid Waste Registration No.: <small>(required if hauling hazardous and/or Class 1 non-hazardous wastes)</small>	
EPA Identification No.: <small>(required if hauling hazardous waste)</small>	

**III. Approval (for TM use only)**

Transporter Code Assigned: <small>(required if hauling waste)</small>	
Insurance Expires:	
Approved to Haul: <small>(select all that apply)</small>	<input type="checkbox"/> Hazardous <input type="checkbox"/> Class 1 <input type="checkbox"/> Class 2 <input type="checkbox"/> Product
Approval/Date:	

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 5.1  
WASTE ANALYSIS PLAN**

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**PART B SECTION IV  
WASTE ANALYSIS PLAN**

**Hazardous Waste Permit Renewal Application**

Hazardous Waste Permit No. 50372  
TM Corpus Christi Services LLC, Corpus Christi, Texas

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***ATTACHMENT IV.1***

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Waste Analysis Plan (*revised*)

Notes:

1. Items listed on this page are being provided as part of the Response to Initial Draft Permit Issued 13 March 2020 and represent replacement pages in the Hazardous Waste Permit Renewal Application for TM Corpus Christi Services LLC as submitted 14 June 2019

GSI Job No. 4887



**ATTACHMENT IV.1  
WASTE ANALYSIS PLAN**

**Hazardous Waste Permit Renewal Application**

Hazardous Waste Permit No. 50372  
TM Corpus Christi Services Limited Partnership, Corpus Christi, Texas

**ATTACHMENT IV.1  
WASTE ANALYSIS PLAN**

**Hazardous Waste Permit Renewal Application**

Hazardous Waste Permit No. 50372  
TM Corpus Christi Services LLC, Corpus Christi, Texas

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## 1.0 INTRODUCTION

### 1.1 Scope of WAP

This Waste Analysis Plan (WAP) describes how the TM Corpus Christi Services LLC (TMCC) facility analyzes wastes to be managed in permitted hazardous waste management units. The plan addresses waste verification for wastes received from off-site and characterization of wastes generated at TMCC.

This WAP has been prepared to comply with the provisions of 40 CFR 264.13, as adopted by the Texas Commission on Environmental Quality (TCEQ) in 30 TAC 335.152(a)(1). The WAP is employed to obtain information needed to treat, store, or dispose of wastes in accordance with applicable state and federal requirements and permit provisions. The WAP also addresses important safety considerations. Certain wastes when mixed with others may produce hazardous situations through heat generation, fires, explosions, or release of toxic substances. Proper waste analysis, characterization, and handling allow for safe waste management and facility operations.

### 1.2 Facility Overview

TMCC offers treatment, storage, and disposal services to generators of hazardous and non-hazardous waste and wastewaters. Disposal of liquid waste via injection well is the only on-site waste disposal activity. Other wastes, either in bulk or containers (e.g., spent filters, sludges and solids, liquid organic wastes, solids, etc.), are consolidated, as appropriate, and sent off-site to authorized facilities for further management or disposal.

TMCC handles a wide variety of wastes that are liquid, semi-solid, or solid, as listed in Table IV.B (see Part B application). TMCC primarily manages wastes generated off-site, as follows:

- Non-hazardous wastes;
- Characteristically hazardous wastes (D-code wastes per 40 CFR 261.21, 261.22, 261.23, and 261.24);
- Hazardous wastes from non-specific sources (F-code wastes per 40 CFR 261.31);
- Hazardous wastes from specific sources (K-code wastes per 40 CFR 261.32);
- Discarded and off-specification commercial chemical products (P- and U-code wastes per 40 CFR 261.33);

TMCC is **not** authorized to manage the following wastes:

- *Polychlorinated biphenyls (PCBs)  $\geq 50$  ppm*, as defined by the EPA in regulations issued pursuant to the Toxic Substances Control Act (40 CFR Part 761), unless TMCC is compliant with the federal requirements for PCB storage specified in 40 CFR Part 761;
- *Radioactive wastes*, unless TMCC becomes authorized to store, process and dispose of radioactive wastes in compliance with specific licensing and permitting requirements

under Chapter 401 of the Texas Health and Safety Code and any other rules of state or federal authorities;

- *Explosive material*, as defined by the Department of Transportation (DOT) under 49 CFR Part 173;
- *Special Waste* from Health-care Related Facilities subject to 25 TAC Chapter 1 or 30 TAC Chapter 330.

### 1.3 WAP Organization

Sections 2.0 – 4.0 focus on wastes received from off-site generators. Section 5.0 describes wastes generated on site from facility operations.

## 2.0 OFF-SITE GENERATED WASTES

### 2.1 Waste Evaluation (Profiling) for New Waste Streams

The purpose of a waste evaluation is to determine whether wastes are acceptable (i.e., allowable under the permit) and to ensure safe and proper handling practices are used during processing. This waste evaluation (profiling) process applies to new waste streams.

#### 2.1.1 Pre-Acceptance Sample

If an inquiry from a potential client indicates the feasibility of managing a new waste, then the customer (i.e., generator or authorized agent) typically provides a pre-acceptance sample along with relevant paperwork to TMCC.

The pre-acceptance sample is analyzed by the TMCC “fingerprint” laboratory to confirm compliance with safety and regulatory requirements and to determine waste handling procedures. Alternatively, the pre-acceptance sample may be submitted to a third-party laboratory accredited under the Texas Laboratory Accreditation Program.

A pre-acceptance sample is typically required for all bulk streams. However, in some cases sufficient information is already available regarding the waste and/or the matrix of the waste such that no pre-acceptance sample is needed for analysis. In addition, a pre-acceptance sample may not be required for waste streams that will be shipped in small volumes, such as drums or totes.

Paperwork submitted by the customer along with the pre-acceptance sample includes, at a minimum, a waste profile (see Figure IV.1.1). For hazardous wastes, a Land Disposal Restriction (LDR) Notification may also be submitted for review prior to approval (see Figure IV.1.2). Note that the forms provided on Figures IV.1.1 and IV.1.2 are examples only and may be updated as needed in the future.

The waste profile form provides detailed information on the waste stream's chemical and physical properties, generating process, and state/EPA waste codes. On this form, the customer also certifies that the information is correct, complete, and accurate and that waste details are based on analysis of a representative sample or use of process knowledge, per EPA guidelines.

### 2.1.2 TMCC Review

TMCC reviews the waste profile form and any supporting documents (e.g., laboratory analyses, material safety data sheets, etc.) for technical adequacy. The review addresses i) environmental/permit compliance; ii) treatability/handling; and iii) health and safety issues.

Errors or omissions discovered during the review process are resolved through contact with the customer by phone, letter, or other means. This contact is typically coordinated by a member of the Sales/Customer Service Department.

### 2.1.3 Waste Stream Approval

If final approval for waste acceptance is granted, unique customer and waste stream identification numbers are issued for tracking purposes. The identification numbers are maintained in a database. Waste profile forms and supporting information are maintained in the facility operating record (see Section 4.0).

### 2.1.4. Shipping

After the waste profile and supporting information is accepted by TMCC, the customer may schedule shipments.

## **2.2 Waste Stream Verification**

TMCC receives off-site generated waste in bulk containers (e.g., tanker trucks, vacuum trucks, roll-off boxes, vacuum boxes, etc.), smaller containers (e.g., drums, totes, etc.), and via pipeline from adjacent facilities. TMCC requires the customer to submit a properly completed manifest or shipping papers and land disposal notification forms along with the waste shipment as specified by regulation (40 CFR 264 Subpart E, 40 CFR 268).

As required by 40 CFR 264.13(a)(4), TMCC inspects and, if necessary, analyzes each hazardous waste movement received at the facility to verify that the waste matches the identity of the waste specified on the accompanying manifest or shipping paper. As further specified in 40 CFR 264.13(c), this WAP describes inspection and analysis procedures for each movement of hazardous waste received at the facility, as follows:

- *Waste Identity, 40 CFR 264.13(c)(1):* Procedures used to determine the identity of each movement of waste managed at the facility are described below in Sections 2.2.1 - Waste Receipt and 2.2.2 - Paperwork and Waste Inspection.

- *Waste Sampling 40 CFR 264.13(c)(2)*: Sampling methods employed to obtain a representative sample of the waste to be identified are described below in Sections 2.2.3 - Fingerprinting and 3.0 – Waste Sampling and Analysis.

Wastes received from co-located or adjacent facilities via pipeline will be transferred to a dedicated receiving tank(s). All wastes transferred via pipeline will be preapproved in accordance with Section 2.1 above. Fingerprint analysis for wastes received via pipeline will be in accordance with Section 2.2.3 below. The fingerprint sample will be taken at the receiving tank prior to removing the waste from the tank. Wastes found to be non-conforming may be rejected.

The following process, for bulk or containerized waste receipts, is used to ensure that only approved wastes are accepted by the facility.

### 2.2.1 Waste Receipt

When waste arrives at TMCC, but prior to off-loading, records in the computer database and tracking system are checked to confirm that the waste has been approved for acceptance (see Section 2.1.3).

### 2.2.2 Paperwork and Waste Inspection

TMCC staff check the paperwork (i.e., manifest or shipping papers) accompanying the waste shipment to make sure that paperwork matches the waste being delivered, in accordance with 40 CFR 264.13(a)(4). If applicable, shipments of hazardous waste may also be accompanied by a Land Disposal Restriction (LDR) Notification Form (see Figure IV.1.2). If any item is missing or incorrect, the discrepancy is resolved prior to accepting the load.

After the paperwork has been reviewed, the load is visually inspected to verify that the identity of the waste is consistent with previous information provided to TMCC. For shipments in containers (e.g., drums), each container is inspected to confirm the condition. If a container holding hazardous waste is compromised (e.g., severe rusting, apparent structural defects, leaking), the waste is transferred to a container in good condition which is compatible with the waste to be stored (40 CFR 264.171).

### 2.2.3 Fingerprinting

A sample is taken in order to perform the "fingerprint" analysis. Fingerprint parameter selection is described in Section 3.2.2. Table IV.C summarizes fingerprint parameters, sampling methods, and sampling frequencies (see Part B application for Table IV.C).

The results of the fingerprint sample are compared to the database and waste description developed during the waste profiling process. If fingerprint results indicate minor differences from the waste description (e.g., pH marginally higher or lower than anticipated), the waste may be accepted based on the review of a person qualified to ensure that the waste can be managed within the conditions of the permit. Qualified

individuals include lead operators, their supervisors, or the environmental manager. Other discrepancies, if any, are directed to the customer service representative for resolution with the customer. If discrepancies cannot be resolved, the load is rejected. TMCC staff documents the reason for the rejection on the manifest and signs the manifest as required.

#### 2.2.4 Waste Acceptance

After the paperwork, inspection, and fingerprint steps are completed, the shipment is accepted for processing. Any identified discrepancies are resolved prior to waste acceptance for bulk loads received for disposal via injection well so that waste management is consistent with the properties included in the waste profile.

TMCC staff sign the manifest acknowledging receipt of the shipment. Note that in occasions of waste rejection, TMCC staff also sign the document because manifest requires signature regardless of acceptance. The manifest is maintained in the facility operating record. The waste tracking database is also updated.

For bulk waste, the general storage location for the waste stream is assigned during the profile approval process (see Section 2.1). The specific storage location for all wastes depends on compatibility and storage capacity at the time of receipt. Additional testing may be done to ensure compatibility prior to further processing. For example, the compatibility of drummed waste with material in a processing tank may be verified by testing small quantities (i.e., samples) of mixtures of the materials. If an adverse reaction is observed (e.g., generation of hydrogen sulfide (H<sub>2</sub>S) or hydrogen cyanide (HCN) as measured with colorimetric tubes, heat generation, or gas generation as evidenced by bubbling or popping), the person conducting the test will contact his or her supervisor. Results of the testing will be taken into account when considering options for waste management in order to prevent adverse reactions.

Special precautions are taken for ignitable, reactive, or incompatible wastes, in accordance with 40 CFR 264.17. These wastes are segregated and managed to prevent reactions which may, for example, produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment.

### **2.3 Waste Profile Re-Evaluation**

Waste profiles are re-evaluated whenever the generator has notified TMCC of a change in the waste or TMCC has reason to think that the waste has changed.

## **3.0 WASTE SAMPLING AND ANALYSIS**

### **3.1 Sampling Methods**

The methods and equipment used for sampling are matched with the form, consistency, and location of the waste materials to be sampled. Methods used by TMCC to obtain representative samples, sampling locations (containers, drums, bins, etc.), and sampling

frequencies for the various waste types are summarized on Table IV.C (see Part B application). The list of sampling methods included in Table IV.C has been developed to be consistent with requirements of 40 CFR 261 Appendix I and USEPA SW-846. Note that in the event that a different waste type, sampling point/location, or sampling container is encountered, TMCC will use a sampling method consistent with USEPA SW-846 or other appropriate guidance. Additionally, exceptions to the sampling methods listed in Table IV.C apply to certain operating conditions and miscellaneous special wastes such as chemical waste from a laboratory (organic waste under pressure, highly odoriferous, lab packs, etc.), in which case a grab or other type of sample will be collected at a valve outlet or other sampling point, as appropriate. An exception may also apply in the case of a waste having significant safety concerns. In such cases, determination of the hazardous waste codes will not be based upon sampling and analyses, but rather on process knowledge and/or published data, such as material safety data sheets. In addition, TMCC typically does not collect a sample of debris, but rather observes the condition of debris.

## 3.2 Analytical/Testing Procedures and Parameters

### 3.2.1 Laboratory Guidelines

Laboratory analyses may be used to aid in waste verification and/or characterization and determine appropriate management methods. The analyses follow guidelines, including QA/QC measures, from published method specifications such as:

- *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*, USEPA Publication SW846, 1987, as revised;
- *Standard Methods for the Evaluation of Wastes and Waste Water*, 18th edition, 1992, as revised;
- *Methods for Chemical Analysis of Water and Wastes*, USEPA Publication 600/4-79-020, 1979;
- *ASTM Standard Test Methods* (e.g., Flash Point by Penske-Martens Closed Tester, American Society for Testing and Materials, Philadelphia);
- HAZCAT Chemical Identification System; or
- *Other*: Alternate standard methods generally accepted by the industry may also be employed for laboratory analyses.

### 3.2.2 Waste Fingerprinting

Fingerprinting is a screening tool employed to confirm that waste received from off-site conforms to the description developed during waste profiling. Each load is sampled and results are compared to the waste profile. Key parameters for fingerprint analysis and rationale for analysis are as follows:

Test	Rationale
<i>pH</i>	<ul style="list-style-type: none"> <li>Determine whether the waste is acidic (pH &lt;7), basic (pH &gt; 7), or neutral (pH 7). If the waste profile specifies the pH as a single value, a pH range of +/- 3 units in shipped wastes is acceptable unless the value results in a change in the classification of the waste to waste code D002.</li> <li>Determine compatibility, processing, and safety requirements.</li> <li>Not applicable to certain types of wastes (e.g., solids).</li> </ul>
<i>Flash Point</i>	<ul style="list-style-type: none"> <li>Verify waste characterization.</li> <li>Not applicable to certain types of wastes (e.g., solids).</li> </ul>
<i>Specific Gravity</i>	<ul style="list-style-type: none"> <li>Verify waste characterization.</li> <li>Not applicable to certain types of wastes (e.g., solids).</li> <li>Help determine the level of processing that may be needed prior to disposal via injection well (i.e., ensure that UIC permit limits are met).</li> </ul>
<i>Reactivity</i>	<ul style="list-style-type: none"> <li>Help determine processing and safety requirements. Cyanide and sulfide waste streams are tested for reactivity and for HCN or H<sub>2</sub>S gas in the headspace of the waste container.</li> <li>Cyanide and sulfide waste streams do not need to be analyzed for reactivity for hazardous waste classification if the pH is less than 2 (40 CFR 261.23(a)(5)).</li> </ul>
<i>Screening for Cyanides</i>	<ul style="list-style-type: none"> <li>Determine whether the waste will produce hydrogen cyanide when mixed with other wastes or water (i.e., compatibility testing).</li> </ul>
<i>Screening for Sulfides</i>	<ul style="list-style-type: none"> <li>Determine whether the waste will produce hydrogen sulfide when mixed with other wastes or water (i.e., compatibility testing).</li> </ul>
<i>Compatibility</i>	<ul style="list-style-type: none"> <li>Avoid hazardous reactions.</li> </ul>
<i>Insoluble Organics</i>	<ul style="list-style-type: none"> <li>Help determine processing requirements. Insoluble organics may be separated and sent off-site for management or rejected.</li> </ul>
<i>Insoluble Solids</i>	<ul style="list-style-type: none"> <li>Help determine processing requirements. Insoluble solids may be separated and sent for alternate disposal, either incineration, stabilization and off-site disposal (landfill) or rejected.</li> </ul>

The specific parameters analyzed depend on the type of waste being evaluated (see Table IV.C in Part B application). Parameter selection is based on i) the physical state of the waste (e.g., pH testing does not apply to solids), ii) the analyses needed to confirm that the wastes match the waste profile, and iii) safety considerations. Supplemental testing may be done at the discretion of Operations personnel, for example, to evaluate treatment and handling needs.

**4.0 RECORD KEEPING**

TMCC maintains documentation such as waste profiles and manifests in the facility operating record. This documentation may be maintained in an electronic format. TMCC also maintains an electronic database which tracks waste movement in the facility. All records received from off-site generated waste are kept in accordance with the applicable regulations (40 CFR 262.11(f) and 262.40).

**5.0 ON-SITE GENERATED WASTES**

Wastes may be generated on site during facility operations (e.g., treatment residues). For wastes generated on site, TMCC completes at the point of waste generation a hazardous waste determination as required under 40 CFR 262.11. The waste determination includes an evaluation of the following factors:

1. *Regulatory Exclusions:* Determination of whether the waste is excluded from regulation per 40 CFR 261.4.
2. *Listed Wastes:* Determination of whether the waste meets the description of a listed hazardous waste under 40 CFR Part 261 Subpart D.
3. *Characteristic Wastes:* Determination of whether the waste meets the definitions of characteristic hazardous waste per 40 CFR Part 261 Subpart C.

The waste classification is done by i) obtaining a chemical analysis of a representative sample of the waste, or ii) using process knowledge to identify hazardous constituents that may be present in the waste, or iii) reviewing existing published or documented data, or iv) using a combination of waste identification methods (40 CFR 262.11).

Waste classification is repeated as necessary to ensure that the evaluation is accurate and up to date per 40 CFR 264.13(a)(3).

Sampling, if performed to comply with 40 CFR 264.13(a)(4), is conducted as described in Section 3.1. Laboratory analyses may be conducted on wastes generated on site or wastes to be disposed off-site, as follows:

Test	Rationale
<i>Toxicity Characteristic Leaching Procedure</i>	<ul style="list-style-type: none"> <li>• Determine whether the waste is characteristically hazardous.</li> </ul>
<i>Total concentrations of organic constituents</i>	<ul style="list-style-type: none"> <li>• Specified in Land Disposal Restrictions per 40 CFR 268.40 and 268.48.</li> </ul>

Types of records maintained for on-site generated hazardous waste include:

- *Signed Manifests:* Copies are retained at least three years from the date of waste acceptance by the initial transporter [40 CFR 262.40(a)].
- *Biennial Reports and Exception Reports:* Copies are retained at least three years from the due date of the report [40 CFR 262.40(b)].
- *Test results, waste analysis, or other hazardous waste determinations:* Copies are retained at least three years from the date the waste is last sent to on- or off-site treatment, storage, or disposal [40 CFR 262.40(c)].
- *Land disposal restriction documentation:* Copies of notices, certifications, and waste analysis data are retained at least three years from the date the waste is last sent for on- or off-site treatment, storage or disposal [40 CFR 268.7(a)(8)].

**PART B SECTION IV  
WASTE ANALYSIS PLAN**

**Hazardous Waste Permit Renewal Application**

Hazardous Waste Permit No. 50372  
TM Corpus Christi Services Limited Partnership, Corpus Christi, Texas

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**TABLES**

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Table IV.A	Waste Management Information ( <i>updated</i> )
Table IV.B	Wastes Managed in Permitted Units ( <i>revised</i> )
Table IV.C	Sampling and Analytical Methods ( <i>revised</i> )

Notes:

1. Items listed on this page are being provided as part of the Response to Technical Notice of Deficiency Issued 25 October 2019 and represent replacement pages in the Hazardous Waste Permit Renewal Application for TM Corpus Christi Services LP as submitted 14 June 2019
2. Revised = Items which include new information for consistency with other portions of the Application for proposed changes to waste management units.  
Updated = Items which include current information based on existing waste management practices at the site.

**Table IV.A. – Waste Management Information**

Waste Type(s)	Source	Volume (tons/year) <sup>1</sup>
<b>Aqueous wastes</b>	<b>Various off-site sources and on-site</b>	<b>33,956,301 lbs (2018)</b>
<b>Organic Liquid Waste</b>	<b>Various off-site sources and on-site</b>	
<b>Solids/Debris</b>	<b>Various off-site sources and on-site</b>	
<b>Sludges</b>	<b>Various off-site sources and on-site</b>	

**Note:**

1. Amount is approximate and based on 2018 data. Actual amount received and/or generated will vary from year to year.

**Table IV.B. – Wastes Managed In Permitted Units**

No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes (see Note 1)
a	Aqueous wastes	See Note 2	001, 003, 004, 009 101-117, 119, 198, 199  H, 1, 2, 3
b	Organic Liquid Waste	See Note 2	001, 003, 004, 009 201-212, 219, 296-299  H, 1, 2, 3
c	Solids/Debris	See Note 2	001-004, 009 301-316, 319, 388-399 401-407, 409, 488-499 902, 999  H, 1, 2, 3
d	Sludges	See Note 2	001, 003, 004, 009 391-392 491,492, 439 501-516, 519, 597-599 601-609, 695-699  H, 1, 2, 3

**Note:**

1. All wastes are evaluated for reactivity, compatibility, and other parameters as specified in the Waste Analysis Plan, to ensure proper handling.
2. EPA Hazardous Waste Numbers include: D001-D043, F001-F012, F019-F028, F032, F034-F035, F037-F039, K001-K011, K013-K052, K060-K062, K069, K071, K073, K083-K088, K093-K118, K123-K126, K131-K132, K136, K141-K145, K147-K151, K156-K159, K161, K169-K172, K174-K178, K181, P001-P018, P020-P024, P026-P031, P033-P034, P036-P051, P054, P056-P060, P062-P078, P081-P082, P084-P085, P087-P089, P092-P099, P101-P106, P108-P116, P118-P123, P127-P128, P185, P188-P192, P194, P196-P199, P201-P205, U001-U012, U014-U039, U041-U053, U055-U064, U066-U099, U101-U103, U105-U138, U140-U174, U176-U194, U196-U197, U200-U201, U203-U211, U213-U223, U225-U228, U234-U240, U243-U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372-U373, U387, U389, U394-U395, U404, U409-U411

**Table IV.C. - Sampling and Analytical Methods<sup>4</sup>**

Waste No. <sup>1</sup>	Sampling Location	Sampling Method	Frequency	Parameter	Test Method <sup>5,6</sup>	Desired Accuracy Level <sup>3</sup>
<b>Aqueous Liquids and Organic Liquid Wastes</b> a, b	From the arriving transport vehicle at the designated sampling area or on the unloading pad <i>or</i> From the consolidation tank or container after bulking at the point of consolidation, in the designated sampling area or in the container storage areas	COLIWASA (or top, middle, bottom composite), dipper, Bomb sampler, or sampling port/valve outlet	Per Note 4 <i>or</i> As necessary after filling tank or container	• pH	• USEPA SW846 Method 9040 <sup>2</sup> <i>or</i> • USEPA SW846 Method 9041 <sup>2</sup>	• +/- 0.1 units  • +/- 1 unit
				• Flash Point	• ASTM D3278-78 <sup>2</sup>	• </>140° F
				• Reactivity	• Lower pH with acid and observe reaction	• No numerical criteria specified by regulation
				• Compatibility	• Carefully combine wastes and observe reaction	• No numerical criteria specified by regulation.
				• Percent Insoluble Organics	• Centrifuge and note organics	• No numerical criteria or regulatory requirement; used by facility for proper operation of injection well.
				• Percent Insoluble Solids	• ASTM D6050 <sup>2</sup>	• No numerical criteria or regulatory requirement; used by facility for proper operation of injection well.
				• Specific Gravity	• ASTM D891 <sup>2</sup>	• No numerical criteria or regulatory requirement; used by facility for proper operation of injection well.
• Reactivity	• Lower pH with acid and observe reaction	• No numerical criteria specified by regulation				

**Table IV.C. - Sampling and Analytical Methods<sup>4</sup>**

Waste No. <sup>1</sup>	Sampling Location	Sampling Method	Frequency	Parameter	Test Method <sup>5,6</sup>	Desired Accuracy Level <sup>3</sup>
<b>Solids/Debris:</b> c	From the arriving transport vehicle or the container at the designated sampling area or on the unloading pad <i>or</i> From the consolidation tank or container after bulking at the point of consolidation, in the designated sampling area or in the container storage areas	Sampling trier, thief, trowel, scoop	Per Note 4 <i>or</i> As necessary after filling container	• Compatibility	• Carefully combine wastes and observe reaction	• No numerical criteria specified by regulation
				• pH	• USEPA SW846 Method 9040 <sup>2</sup> <i>or</i> • USEPA SW846 Method 9041 <sup>2</sup>	• +/- 0.1 units  • +/- 1 unit
<b>Sludges:</b> d	From the arriving transport vehicle at the designated sampling area or on the unloading pad <i>or</i> From the consolidation tank or container after bulking at the point of consolidation, in the designated sampling area or in the container storage areas	COLIWASA, sampling trier, thief, trowel, scoop, sampling port or valve	Per Note 4 <i>or</i> As necessary after filling tank or container	• Flash Point	• ASTM D3278-78 <sup>2</sup>	• </>140° F
				• Reactivity	• Lower pH with acid and observe reaction	• No numerical criteria specified by regulation
				• Compatibility	• Carefully combine wastes and observe reaction	• No numerical criteria specified by regulation
				• Percent Insoluble Organics	• Centrifuge and note organics	• No numerical criteria or regulatory requirement; used by facility for waste management
				• Percent Insoluble Solids	• ASTM D6050 <sup>2</sup>	• No numerical criteria or regulatory requirement; used by facility for waste management
				• Specific Gravity	• ASTM D891 <sup>2</sup>	• No numerical criteria or regulatory requirement; used by facility for proper operation of injection well.

### Table IV.C. - Sampling and Analytical Methods<sup>4</sup>

<sup>1</sup> from Table IV.B, first column

<sup>2</sup> Sampling and Test/Analysis methods should be specified in enough detail to allow determination of whether they are suitable and correct for the purpose indicated while allowing flexibility in selection and future updates to the specified method. Standard methods, such as those from SW-846, will generally require no further submittal. Non-standard and proprietary methods may require additional information to determine suitability. ASTM methods may require submittal of a copy of the specified method.

<sup>3</sup> Desired Accuracy Level should provide a specified numeric minimum performance level (maximum acceptable reporting limit) for method detection and quantitation limits that will be accepted from the laboratory performing the analysis and must ensure that reported data will allow determinations of compliance with regulatory limits for the parameter tested.

#### Additional Notes:

<sup>4</sup> **Loads received from off-site are sampled as described below:**

- **Drums:** At least 10% of the drums are sampled from each load for a given waste stream (i.e., if the shipment contains fewer than 10 drums, then at least one drum is sampled per waste stream).
- **Bulk Waste:** 5% of multiple shipments of a single waste stream from a single operator or source are sampled. If fewer than 20 truckloads are received of a single waste stream from a single operator or source, at least one truck will be sampled.

<sup>5</sup> Analyses may be conducted as needed for wastes received from off-site, wastes generated on-site, or wastes to be shipped off-site.

<sup>6</sup> An equivalent method may be used from USEPA SW846, Standard Methods, ASTM Methods, or Industry Accepted Standards, as appropriate to parameter.

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 5.2  
WASTE PROFILE DOCUMENT AND LAND DISPOSAL RESTRICTION NOTIFICATION**

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HA 7 cfdi g7\ f]gh'GYfj ]Wg' @a ]hX'DUf'Yfg\ ]d'  
K 5 GH9 'DFC: =@'

HA77'DfcZ'Y#K G :

\* - \$%; fYYbk ccX'8fj] Y' -7 cfdi g7\ f]gh]ZHL'+, (% ...D\ cbY.' '\*%#) &, & ( ...: U.' '\*%#) &' % +

**#7I GHCA9F# 9B9F5HCF -B: CFA5HCB.**

Customer Name _____	Generator Name _____
Billing Address _____	Physical Address _____
_____	_____
Contact _____	Mailing Address _____
Phone _____	_____
Fax _____	24-Hour Contact _____
E-MAIL _____	24-Hour Phone _____

**#K 5 GH9 ; 9B9F5HCB'85H5.**

Waste Name: \_\_\_\_\_

Describe the process that generates this waste: \_\_\_\_\_

\_\_\_\_\_

Annual Volume: \_\_\_\_\_ lbs \_\_\_\_\_ tons \_\_\_\_\_ gals \_\_\_\_\_ drums Container Size/Type: \_\_\_\_\_ Shipping Frequency: \_\_\_\_\_ per \_\_\_\_\_

EPA ID No. [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] State ID No. [ ] [ ] [ ] [ ] State Waste Code [ ] [ ] [ ] [ ] [ ] [ ] SIC# [ ] [ ] [ ] [ ]

**#F7F5'85H5.**

Is waste hazardous per RCRA? Yes No If yes, please attach completed Land Disposal Restriction Notification Form.

EPA Hazardous \_\_\_\_\_

Waste Codes: \_\_\_\_\_

**#K 5 GH9 'DFCD9FH9G.**

(A) pH Range: _____ to _____	(G) Flash Point: _____ ° F ° C
(B) Specific Gravity: _____ to _____	Closed Cup Open Cup
(C) Appearance (e.g. yellow, clear, turbid, etc.): _____	(H) Vapor Pressure: _____ (PSI)
(D) Physical State: Solid Liquid Semi-Solid	(I) Settled Solids (by vol.): _____ to _____ %
(E) Odor: Strong Mild None	(J) Insoluble Constituents (by vol.): _____ to _____ %
(F) Describe Odor (acidic, rancid, etc.): _____	(K) Dry Weight Factor: _____

Mark if any of the following pertain to this waste: \_\_\_\_\_ Does the waste liberate any gases above PEL into the headspace?

Pyrophoric	Pesticides	PCBs > 50 ppm	Hydrogen Cyanide	_____
Hydrophobic	Dioxins	Universal	Hydrogen Sulfide	_____
Biological	Carcinogens	Lab Pack	Sulfur Dioxide	_____
Explosives	Sulfides	NESHAP-Regulated	Other Toxic Gas	_____
Radioactive	Organics	(Part____, Subpart____)	Specify: _____	

**J"G<-DD-B; -B: CFA5HCB.**

DOT Shipping Name: \_\_\_\_\_

DOT Hazard Class: \_\_\_\_\_ UN/NA Number: \_\_\_\_\_ Packing Group: \_\_\_\_\_ Reportable Qty. (Lbs): \_\_\_\_\_

Required personnel protective equipment & procedures: \_\_\_\_\_

\_\_\_\_\_

Other comments or hazards including effects on human health in the event of a release: \_\_\_\_\_

\_\_\_\_\_





**TM Corpus Christi Services Limited Partnership**  
**LAND DISPOSAL RESTRICTION (LDR) NOTIFICATION**

<b>Generator Name:</b>	
<b>TMCC Profile/WS #:</b>	
<b>Manifest Number:</b>	

<b>EPA Waste Code(s)</b>	<b>Wastewater (WW)/ Non-wastewater (NW)</b>	<b>Subcategory / Constituent(s) of Concern<sup>1</sup></b>	<b>Treatment Status Code</b>

*The following are the underlying hazardous constituents (UHCs)<sup>2</sup> applicable to the waste listed above:*

**TREATMENT STATUS CODES:** Use the following codes for each EPA Waste Code applicable to the waste.

- A. REQUIRES TREATMENT:** The untreated waste identified above is subject to the LDRs. The constituents of concern for F001-F005 and F039 wastes are listed above<sup>1</sup> and the UHCs (see 40 CFR 268.2(i))<sup>2</sup> in characteristic wastes are also listed above.
  - A1. **Debris:** The waste is a debris to be treated with the alternative treatment technologies provided by and to comply with 268.45, the contaminants subject to treatment are listed above.
  - A2. **Soil:** *This contaminated soil [DOES/DOES NOT] contain listed hazardous waste and [DOES/DOES NOT] exhibit a characteristic of hazardous waste and is subject to the soil treatment standards as provided by 268.49(c) or the universal treatment standards. The constituents subject to treatment are listed above.*
- B. MEETS TREATMENT STANDARDS:** *I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.*
  - B1. **Soil:** *This contaminated soil [DOES/DOES NOT] contain listed hazardous waste and [DOES/DOES NOT] exhibit a characteristic of hazardous waste and complies with the soil treatment standards as provided by 268.49(c) or the universal treatment standards. The constituents subject to treatment are listed above.*
- C. TREATED TO MEET TREATMENT STANDARDS:** *I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.*
  - C1. **Soil:** *This contaminated soil [DOES/DOES NOT] contain listed hazardous waste and [DOES/DOES NOT] exhibit a characteristic of hazardous waste and complies with the soil treatment standards as provided by 268.49(c) or the universal treatment standards. The constituents subject to treatment are listed above.*
- D. SUBJECT TO EXEMPTION:** The waste identified above is not prohibited from land disposal because the waste qualifies for one of the following exemptions:
  - D1. A case-by-case extension under 40 CFR Section 268.5 (date waste is subject to prohibition: \_\_\_\_\_)
  - D2. A national or case-by-case capacity variance (date waste is subject to prohibition: \_\_\_\_\_)
  - D3. Disposal in a no-migration unit under 40 CFR Section 268.6.
  - D4. D001 (<10% TOC), D002 or D012-D043 waste treated in Class I Injection Well, Clean Water Act (CWA) System or CWA-equivalent system.
- E. NON-RESTRICTED:** The waste identified above is not restricted from land disposal.
- F. LAB PACKS:**
  - F1. **Direct land disposal:** *The waste identified above meets the requirements of 264.316 and may be directly disposed in a hazardous waste landfill.*
  - F2. **Incineration:** *I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under appendix IV to 40 CFR part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.*

By my signature below, the generator acknowledges that this is being submitted to TM Corpus Christi Services Limited Partnership (TMCC) pursuant to applicable federal regulations, including 40 CFR §268.7, and that TMCC and its representatives may rely on the statements and information presented on this form. The generator hereby attests to the applicable certifications set forth in italics above, and I represent that the statements and information on this form, to the best of my knowledge and belief, are true, accurate and complete in all respects.

Signature: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_  
 Printed Name: \_\_\_\_\_

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 5.3  
OFFSITE FACILITIES**

---

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 5.3  
OFFSITE FACILITIES**

- **Subtitle C Hazardous/Class 1 Non-Hazardous Landfill**
  - US Ecology Texas, Inc. – Robstown, Texas
  
- **Class 2 Non-Hazardous Landfill**
  - Republic Services – El Centro Landfill, Robstown, Texas
  
- **Subtitle C Hazardous Incinerators: Solids & Liquids**
  - Veolia Environmental Services – Port Arthur, Texas
  
- **Cement Kiln: Liquid Fuels**
  - Cadence Chemicals / Ash Grove Cement – Foreman, Arkansas
  
- **Carbon Regeneration**
  - Evoqua Water Technologies – Parker, Arizona

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 6.1  
EXPERIENCE MODERATOR RATE**

---

February 18, 2020

Texas Molecular Holdings, LLC.  
P.O. Box 1914  
Deer Park, TX 77536

**Re: Experience Modifier**

To Whom It May Concern:

This letter will confirm the current Experience Modifier for Texas Molecular and all entities/divisions for 2019 is as follows:

Rating Effective Date:

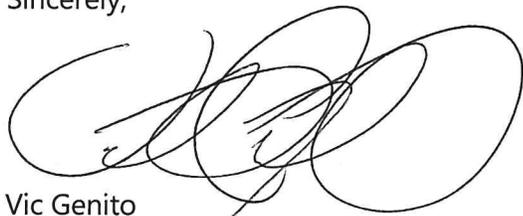
9/19/2019

Experience Modifier:

0.69

If you have any questions regarding the above, please do not hesitate to contact us.

Sincerely,



Vic Genito  
Account Manager  
Lockton Companies, LLC.



**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 6.2  
OSHA 300A LOGS**

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**Note: You can type input into this form and save it.**  
 Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the free Adobe PDF Reader.



# Summary of Work-Related Injuries and Illnesses

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

## Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	0
(G)	(H)	(I)	(J)

## Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
(K)	(L)

## Injury and Illness Types

Total number of . . . (M)			
(1) Injuries	0	(4) Poisonings	0
(2) Skin disorders	0	(5) Hearing loss	0
(3) Respiratory conditions	0	(6) All other illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

Public reporting burden for this collection of information is estimated to average 50 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

**Establishment information**

Your establishment name TM Corpus Christi Services LP

Street 6901 Greenwood Drive

City Corpus Christi State TX Zip 78415

Industry description (e.g., *Manufacture of motor truck trailers*)  
Hazardous Waste Treatment, Storage, and Disposal Facility

Standard Industrial Classification (SIC), if known (e.g., 3715)  
4953

OR \_\_\_\_\_

North American Industrial Classification (NAICS), if known (e.g., 336212)  
562211

**Employment information** (If you don't have these figures, see the Worksheet on the next page to estimate.)

Annual average number of employees 6

Total hours worked by all employees last year 11468

**Sign here**

**Knowingly falsifying this document may result in a fine.**

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Neil Edwards VP - Operations  
 Company executive Title

Phone 281 - 930 - 2543 Date 1 / 29 / 20

Save Input

# Summary of Work-Related Injuries and Illnesses

**Note: You can type input into this form and save it.**  
 Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the free Adobe PDF Reader.

Year 20 18



U.S. Department of Labor  
 Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

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0	0	0	0
(G)	(H)	(I)	(J)

### Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
(K)	(L)

### Injury and Illness Types

Total number of . . . (M)			
(1) Injuries	0	(4) Poisonings	0
(2) Skin disorders	0	(5) Hearing loss	0
(3) Respiratory conditions	0	(6) All other illnesses	0

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### Establishment information

Your establishment name TM Corpus Christi Services LP

Street 6901 Greenwood Drive

City Corpus Christi State TX Zip 78415

Industry description (e.g., *Manufacture of motor truck trailers*)

Hazardous Waste Treatment, Storage, and Disposal Facility

Standard Industrial Classification (SIC), if known (e.g., 3715)

4593

OR

North American Industrial Classification (NAICS), if known (e.g., 336212)

562211

**Employment information** (If you don't have these figures, see the Worksheet on the next page to estimate.)

Annual average number of employees 4

Total hours worked by all employees last year 8748

**Sign here**

**Knowingly falsifying this document may result in a fine.**

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Signature] CEO  
 Company executive Title

Phone 281 - 930 - 2519 Date 1 / 22 / 2019

Save Input

# Summary of Work-Related Injuries and Illnesses

**Note: You can type input into this form and save it.**  
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Year 20 17



U.S. Department of Labor  
 Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

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Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0."

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Number of Cases			
Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
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Number of Days	
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(K)	(L)

Injury and Illness Types			
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4593

OR

North American Industrial Classification (NAICS), if known (e.g., 336212)  
562211

**Employment information** (If you don't have these figures, see the Worksheet on the next page to estimate.)

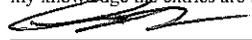
Annual average number of employees 5

Total hours worked by all employees last year 11457

**Sign here**

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

 CEO  
 Title

Company executive

Phone 281 - 930 - 2519 Date 01 / 31 / 18

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 6.3  
REGULATORY INVESTIGATIONS**

---

Jon Niermann, *Chairman*  
Emily Lindley, *Commissioner*  
Bobby Janecka, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 19, 2019

Mr. Chris Lobue  
CEO  
Texas Molecular  
P.O. Box 1914  
Deer Park, Texas 77536

Re: Compliance Evaluation Investigation at:  
Texas Molecular Corpus Christi Services, 6901 Greenwood Drive, Corpus Christi  
(Nueces County), Texas  
Regulated Entity No.: 102977535; TCEQ ID No.: 83093; EPA ID No.: TXR000001016;  
Investigation No.: 1616510

Dear Mr. Lobue:

On December 10, 2019, Ms. Marissa Wooten of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for industrial and hazardous waste and used oil. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Wooten in the Corpus Christi Region Office at (361) 825-3100.

Sincerely,

  
Timothy C. Perdue, CHMM  
Waste Section Manager  
Corpus Christi Region Office

TCP/MW/mjd

cc: Ms. Christina Perez, Environmental Manager

Jon Niermann, *Chairman*  
Emily Lindley, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 8, 2019

**CERTIFIED MAIL #91 7199 9991 7039 6482 1765**  
**RETURN RECEIPT REQUESTED**

Ms. Christina Perez  
Environmental Manager  
TM Corpus Christi Services, Limited Partnership  
6901 Greenwood Drive  
Corpus Christi, Texas 78415

Re: Notice of Violation for Compliance Evaluation Investigation at:  
TM Corpus Christi Services, LP, Corpus Christi (Nueces County), Texas  
Regulated Entity No.: 102977535; TCEQ ID No.: WDW-070; Investigation No.: 1580197

Dear Ms. Perez:

On June 20, 2019, Mr. Rich Heitzenrater of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for underground injection control regulations. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violation. Therefore, no further action is required.

In the listing of the alleged violation, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Corpus Christi Region Office at 361-825-3100 or the Central Office Publications Ordering Team at 512-239-0028. Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at 800-490-9198.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the Corpus Christi Region Office within 10 days from the date of this letter. At that time, a manager will schedule a violation review meeting to be conducted within 21 days from the date of this letter.

Ms. Christina Perez

Page 2

August 8, 2019

However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the enclosed Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Heitzenrater in the Corpus Christi Region Office at (361) 825-3125.

Sincerely,



Timothy C. Perdue, CHMM, Waste Section Manager  
Corpus Christi Region Office  
Texas Commission on Environmental Quality

TCP/RH/mjc

cc: Mr. Jose Torres, EPA Region 6, 6WQ-s  
Ms. Catherine Skurow, TM Corpus Christi Services

## Summary of Investigation Findings

<b>TM CORPUS CHRISTI SERVICES</b> 6901A GREENWOOD DR CORPUS CHRISTI, NUECES COUNTY, TX 78415	Investigation # 1580197 Investigation Date: 06/20/2019
Additional ID(s): 83093 50372 WDW070 TXR000001016	

### ALLEGED VIOLATION(S) NOTED AND RESOLVED ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 720644

30 TAC Chapter 305.125(1)  
30 TAC Chapter 331.64(d)  
40 CFR Chapter 146.13(b)(2)

**PERMIT WDW070, PP.VIII.A MONITORING AND TESTING**

Monitoring and testing shall be in compliance with the requirements of 30 TAC §305.125, §331.64, the plans and specifications of the permit application, and the following conditions (VIII.B. - VIII.I.).

**Alleged Violation:**

Investigation: 1580197

Comment Date: 08/07/2019

Specifically, on January 7, 2017, instrumentation recorded erroneous data from approximately 6:00 am to 10:00 am. The permittee attributed this to freezing of the transmitters due to inclement weather. On April 14, 2018, the data collection system did not record data from approximately 4:00 am to 9:25 am. The permittee attributed this to an area wide power outage caused by high winds in the area that day.

**Resolution:** On June 20, 2019, during the investigation, the permittee provided adequate compliance documentation to resolve the violation.

Track No: 720647

30 TAC Chapter 305.125(1)  
30 TAC Chapter 331.63(f)

**PERMIT WDW070, PP.VII.D. OPERATING PARAMETERS**

The maximum injection rate shall not exceed 150 gallons per minute.

**Alleged Violation:**

Investigation: 1580197

Comment Date: 07/19/2019

Specifically, on January 18, 2018, during startup of the well, the injection flow rate increased to 157.5 gallons per minute (gpm) for less than one minute. The alarms and automatic shutoffs were then triggered and shut in the well.

**Resolution:** On June 20, 2019, during the investigation, the permittee provided adequate compliance documentation to resolve the violation.

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Jon Niermann, *Commissioner*  
Emily Lindley, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 23, 2018

Mr. Chris Lobue  
CEO  
Texas Molecular  
P.O. Box 1914  
Deer Park, Texas 77536

Re: Compliance Evaluation Investigation at:  
Texas Molecular Corpus Christi Services, 6901 Greenwood Drive, Corpus Christi (Nueces County), Texas  
Regulated Entity No.: 102977535; TCEQ ID No.: 83093; Investigation No. 1510747

Dear Mr. Lobue:

On July 30, 2018, Ms. Stephanie Lichtblau, Mr. Timothy Perdue, and Ms. Susan Clewis of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for the management of industrial solid and hazardous waste and used oil. No violations are being alleged as a result of the investigation; however, please see the enclosed Areas of Concern.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Lichtblau in the Corpus Christi Region Office at 361-825-3100.

Sincerely,

A handwritten signature in blue ink that reads "Timothy Perdue".

Mr. Timothy Perdue, CHMM  
Waste Section Manager  
Corpus Christi Region Office

TP/SL/mjc

Enclosure: Summary of Investigation Findings

cc: Mrs. Christina Perez, Environmental Manager

## Summary of Investigation Findings

TM CORPUS CHRISTI SERVICES 6901A GREENWOOD DR CORPUS CHRISTI, NUECES COUNTY, TX 78415	Investigation # 1510747 Investigation Date: 07/30/2018
Additional ID(s): 83093 50372 TXR000001016	

### AREA OF CONCERN

Track No: 688213

30 TAC Chapter 335.261(a)

40 CFR Chapter 273.13(d)

**Alleged Violation:**

Investigation: 1510747

Comment Date: 08/15/2018

Failed to manage universal waste lamps in containers or packages that are structurally sound, adequate to prevent breakage, compatible with the contents of the lamps, that remain closed, and that lack evidence of leakage, spillage, or damage that could cause leakage under reasonable foreseeable conditions.

Specifically, during the investigation conducted on July 30, 2018, two boxes of universal waste lamps, one box of 8 foot lamps and another box of 2 foot lamps, were observed open in the shop area of the facility.

**Recommended Corrective Action:** The regulated entity shall submit adequate compliance documentation, including photographs, indicating that boxes storing universal waste lamps are closed except when adding or removing items.

**Resolution:** On July 30, 2018, during the investigation, the facility closed the boxes of universal waste lamps. Investigators took photographs of the closed boxes providing adequate compliance documentation to resolve the alleged violation.

Track No: 688218

30 TAC Chapter 335.152(a)(8)

40 CFR Chapter 264.193(e)(1)(iii)

**Alleged Violation:**

Investigation: 1510747

Comment Date: 08/15/2018

Failed to maintain a hazardous waste tank external liner system that is free of cracks or gaps.

Specifically, during the investigation conducted on July 30, 2018, it was observed that while inspecting Tank T-29 (NOR006), the liner was appeared to have cement exposed in five areas on the foundation of the tank.

**Recommended Corrective Action:** The regulated entity shall submit adequate compliance documentation including photographs indicating repairs to the secondary containment around T-29 (NOR006) has been repaired.

**Resolution:** On July 30, 2018, during the investigation, the facility repaired the liner to the secondary containment around T-29 (NOR006). Investigators took photographs of the repaired liner providing adequate compliance documentation to resolve the alleged violation.



P.O. Box 12847 Austin, Texas 78711 ♦ (800) 835-5832 ♦ (512) 463-7476 ♦  
 Hearing impaired: (800) 735-2988 voice ♦ www.texasagriculture.gov

**FILE COPY**

K.10

E.A

RWM-778

**Texas Department of Agriculture**  
*Device Inspection Findings*

COMMISSIONER SID MILLER

<b>SECTION A</b>	<b><sup>1</sup> VERIFICATION INFORMATION</b>	
	Client Name TM CORPUS CHRISTI SERVICES LIMITED PARTNERSHIP	TDA Client No. 00473110
	Facility Name TM CORPUS CHRISTI SERVICES LIMITED PARTNERSHIP	TDA Account No. 0622653

<b>SECTION B</b>	<b><sup>1</sup> INSPECTION INFORMATION</b>		
	Inspection Type Routine	Inspection ID No. 8636170606071317	
	Inspector ID 08636	Inspector Name JUAN L CORTEZ	Region <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5
	Date 06/06/2017 <small>Enter as MM/DD/YYYY</small>	Time 09:41 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	County Code 355

<b>SECTION C</b>	<b><sup>1</sup> FINDINGS</b>
	<b><sup>2</sup> REMARKS</b>
	Contact: Cathy Skurow / Telephone#: (281) 930-2598 / Truck Scale passed inspection on this time and date. Class III Scale Capacity: 120,000lbs x 20lbs



**Texas Department of Agriculture**  
**Regulatory Notice of Inspection**

**R - 003**

COMMISSIONER SID MILLER

<b>SECTION A</b>	<b>1 VERIFICATION INFORMATION</b>	
	Client Name TM CORPUS CHRISTI SERVICES LIMITED PARTNERSHIP	TDA Client No. 00473110
	Facility Name TM CORPUS CHRISTI SERVICES LIMITED PARTNERSHIP	Account No Expiration 0622653 05/31/2017

<b>SECTION B</b>	<b>1 INSPECTION INFORMATION</b>		
	Inspection Type Routine	Inspection ID No. 8636170606071317	
	Inspector ID 08636	Inspector Name JUAN L CORTEZ	Region <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5
	Date 06/06/2017 Enter as MM/DD/YYYY	Time 09:07 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	County Code 355 County NUECES

<b>SECTION C</b>	<b>1 NOTIFICATION</b>
	As a licensee under the jurisdiction of the Texas Department of Agriculture (TDA) you are subject to inspection by TDA. You are hereby notified that you are to be inspected by TDA at this time, as authorized by the law or laws marked below. Your inspection may include the review, copying, sampling, testing, or seizure of records, land, equipment, products, or other tangible items. You may also be required to provide copies of records or other documents on or before a given date, whether the items are available for immediate inspection or not. Refusal of inspection may result in the assessment of an administrative penalty against you.
	<input checked="" type="checkbox"/> Weights & Measures – Texas Agriculture Code Sections 13.039(a), 13.035, 13.101, 13.257(b), and/or 13.1001
	<input type="checkbox"/> Nursery Floral – Texas Agriculture Code Sections 12.021, 71.005, 71.0081, 71.0082, 71.0083, 71.009, 71.0091, 71.042, 71.044, 71.046, 71.053, 71.102, 71.114, and/or 71.0101
	<input type="checkbox"/> Egg – Texas Agriculture Code Sections 132.003, 132.004, 132.005(b), 132.006(a), 132.043, 132.061(c), and/or 132.071(c)
	<input type="checkbox"/> Grain Warehouse – Texas Agriculture Code: Sections 14.012, 14.015, 14.023(a)(2), 14.057(f), 14.059(b)
<input type="checkbox"/> Handling and Marketing of Perishable Commodities – Texas Agriculture Code Sections 101.015(b), 101.016(b), 101.016(d), 101.017(b), and/or 101.018	
<input type="checkbox"/> Organics - Texas Administrative Code 18.400, and/or 18.670	

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 23, 2016

**CERTIFIED MAIL #9171999991703134601692**  
**RETURN RECEIPT REQUESTED**

Ms. Christina Perez  
Environmental Manager  
TM Corpus Christi Services, Limited Partnership  
6901 Greenwood Drive  
Corpus Christi, Texas 78415

Re: Notice of Violation for Compliance Evaluation Investigation at:  
TM Corpus Christi Services, LP, Corpus Christi (Nueces County), Texas  
Regulated Entity No.: 102977535; TCEQ ID No.: WDW-070; Investigation No.: 1335295

Dear Ms. Perez:

On May 20, 2016, Mr. Rich Heitzenrater of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for underground injection control. Enclosed is a summary which lists the investigation findings. During the investigation, a certain outstanding alleged violation was identified for which compliance documentation was required. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violation. Therefore, no further action is required.

In the listing of the alleged violation, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled Obtaining TCEQ Rules (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Corpus Christi Region Office at (361) 825-3100 or the Central Office Publications Ordering Team at (512) 239-0028.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the Corpus Christi Region Office within 10 days from the date of this letter. At that time, a manager will schedule a violation review meeting to be conducted within 21 days from the date of this letter.

Ms. Christina Perez  
Page 2  
June 23, 2016

However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the enclosed Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you have any questions regarding this matter please contact Mr. Rich Heitzenrater at the Corpus Christi Region Office at (361) 825-3119.

Sincerely,



Michelle Phillips, Waste Section Manager  
Corpus Christi Region Office  
Texas Commission on Environmental Quality

MP/RH/mjc

Enclosure: Summary of Investigation Findings

cc: Mr. Jose Torres, EPA Region 6, 6WQ-s  
Ms. Catherine Skurow, TM Corpus Christi Services

## Summary of Investigation Findings

TM CORPUS CHRISTI SERVICES

6901A GREENWOOD DR  
CORPUS CHRISTI, NUECES COUNTY, TX 78415

Investigation #  
1335295  
Investigation Date: 05/20/2016

Additional ID(s): 83093  
50372  
WDW070  
TXR000001016

### ALLEGED VIOLATION(S) NOTED AND RESOLVED ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 607024

30 TAC Chapter 331.63(f)

PERMIT WDW070, PP. VII. D.

The maximum injection rate shall not exceed 150 gallons per minute.

**Alleged Violation:**

Investigation: 1335295

Comment Date: 06/20/2016

Failed to maintain the injection rate below the maximum permitted limit of 150 gallons per minute.

Specifically, on December 2, 2014. During normal operation of the well, the injection flow rate increased to 154.1 gallons per minute (gpm) for less than 15 seconds. The alarms and automatic shutoffs were triggered and shut in the well. On March 10, 2016, during well startup, the injection rate increased to 157.5 gpm for approximately four seconds. The alarms and automatic shutoffs were triggered and shut in the well.

**Recommended Corrective Action:** The facility shall maintain the injection rate below the maximum permitted limit of 150 gallons per minute.

**Resolution:** On March 10, 2016, the alarm set limits on the automatic shutoff system were reset to prevent future exceedances of the injection rate.

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 21, 2015

Mr. Frank Marine  
President  
Texas Molecular Corpus Christi Services LP  
P. O. Box 1914  
Deer Park, Texas 77536

Re: Compliance Evaluation Investigation at:  
Texas Molecular, 6901A Greenwood Drive, Corpus Christi (Nueces), Texas  
Regulated Entity No.: 102977535, TCEQ ID No.: 83093, EPA ID No.: TXR00001016  
Investigation No.: 1281231

Dear Mr. Marine:

On September 29, 2015, Mr. Thomas Mason and Ms. Kendra Bernhagen of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for industrial solid waste management. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Mason in the Corpus Christi Region Office at 361-825-3100.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Phillips".

Michelle Phillips  
Waste Section Program Manager  
Corpus Christi Region Office

MP/TM/mjd

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 7.1  
INSURANCE DOCUMENTS**

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All policies (except Workers' Compensation/EL) include a blanket automatic additional insured endorsement [provision] that confers additional insured status to the certificate holder only if there is a written contract between the named insured and the certificate holder that requires the named insured to name the certificate holder as an additional insured. In the absence of such a contractual obligation on the part of the named insured, the certificate holder is not an additional insured under the policy.

All policies include a blanket automatic waiver of subrogation endorsement [provision] that provides this feature only when there is a written contract between the named insured and the certificate holder that requires it. In the absence of such a contractual obligation on the part of the named insured, the waiver of subrogation feature does not apply.

All policies (except Workers' Compensation/EL) contain a special endorsement with "primary and noncontributory" wording.



TM Corpus Christi Services Limited Partnership

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October 4, 2019

Mr. Mark Stuebner  
Financial Analyst  
Financial Assurance Unit, MC-184  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Re: Certificate of Insurance for Liability  
TM Corpus Christi Services Limited Partnership  
Hazardous Waste Permit No. 50372  
UIC Permit No. WDW-070  
Industrial Solid Waste Registration No. 83093  
EPA ID No. TXR000001016

Dear Mr. Stuebner:

Please find enclosed one (1) original Certificate of Insurance for Liability issued and effective on September 19, 2019 for the above-referenced facility located in Corpus Christi, Texas.

If you have any questions or need further information, please feel free to call me at (281) 930-2593.

Sincerely,

Christina Perez  
Director - EHS

Enclosure

cc: Cathy Skurow, Facility Manager, TMCC, Corpus Christi, Texas

**ENDORSEMENT NO.13**

**This endorsement, effective 12:01 AM:** September 19, 2019

**Forms a part of policy no.:** EG 18154991

**Issued to:** TEXAS MOLECULAR LIMITED PARTNERSHIP

**By:** AIG SPECIALTY INSURANCE COMPANY

**THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.**

**TEXAS ENDORSEMENT FOR LIABILITY**

It is hereby agreed that the Policy is amended as follows:

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 30 TAC §37.404 (relating to Liability Requirements for Sudden and Nonsudden Accidental Occurrences). The coverage applies at TCEQ SWR # 32299, TCEQ Permit #50058, WDW 169, WDW 249, WDW 422 TM Deer Park Services Limited Partnership, 2525 Independence Parkway Deer Park, TX 77536 and TCEQ SWR # 83093, TCEQ Permit #HW 50372, WDW 070, TM Corpus Christi Services Limited Partnership, 6901 Greenwood Drive, Corpus Christi, TX 78415 for sudden and nonsudden accidental occurrences. The limits of liability are \$4,000,000 each occurrence and \$8,000,000 annual aggregate limits of the Insurer's liability, exclusive of legal defense costs.
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of this Paragraph are hereby amended to conform with subsections (a) through (e):
  - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
  - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 30 TAC §37.541 (relating to Financial Test for Liability).
  - (c) Whenever requested by the TCEQ executive director, the Insurer agrees to furnish to the executive director a signed duplicate original of the policy and all endorsements.

**ENDORSEMENT NO. 13 (Continued)**

- (d) Cancellation of this endorsement, whether by the Insurer, the Insured, or a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the facility, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the TCEQ executive director.
- (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of 30 days after a copy of such written notice is received by the TCEQ executive director.

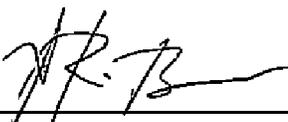
Attached to and forming part of policy No. 18154991 issued by AIG Specialty Insurance Company, herein called the Insurer, of 175 Water Street, New York, NY, 10038 to Texas Molecular Limited Partnership on behalf of TM Deer Park Services, LP and TM Corpus Christi Services, LP of 2525 Independence Parkway Deer Park, TX 77536 this 19th day of September 2019. The effective date of said policy is September 19, 2019.

I hereby certify that the wording of this endorsement is identical to the wording specified in 30 TAC §37.641 as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer in Texas.

Signature of Authorized Representative of Insurer - See Below  
Date September 19, 2019  
Kerry Simon, Executive Vice President

Authorized Representative of AIG Specialty Insurance Company  
175 Water Street, New York, NY, 10038

All other terms, conditions and exclusions remain the same.

  
\_\_\_\_\_  
**Authorized Representative  
or countersignature (where required by law)**

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 7.2  
CLOSURE PLAN**

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**PART B SECTION VII  
CLOSURE AND POST-CLOSURE PLANS**

**Hazardous Waste Permit Renewal Application**

Hazardous Waste Permit No. 50372  
TM Corpus Christi Services Limited Partnership, Corpus Christi, Texas

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***ATTACHMENT VII.1***

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Closure Plan

GSI Job No. 4887



**ATTACHMENT VII.1  
CLOSURE PLAN**

**Hazardous Waste Permit Renewal Application**

Hazardous Waste Permit No. 50372  
TM Corpus Christi Services Limited Partnership, Corpus Christi, Texas

**ATTACHMENT VII.1  
CLOSURE PLAN**

**Hazardous Waste Permit Renewal Application**

Hazardous Waste Permit No. 50372  
TM Corpus Christi Services Limited Partnership, Corpus Christi, Texas

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## 1.0 INTRODUCTION

### 1.1 Scope

This plan addresses the closure of hazardous waste management units at the TM Corpus Christi Services Limited Partnership (TMCC) facility. Closure refers to the process of permanently removing from service a waste management unit or an entire facility. This plan has been developed to comply with the Federal (40 CFR Part 264 Subpart G) and State (30 TAC 335.8 and Subchapter F, and 30 TAC 350) requirements as well as applicable technical guidance.

The TMCC facility includes hazardous waste treatment and storage operations conducted under the following permit and registration numbers:

TCEQ Solid Waste Registration No.	83093
TCEQ Hazardous Waste Permit No.	50372
EPA Identification No.	TXR000001016

Units subject to this closure plan include container storage areas, tanks, and associated secondary containment areas (see Table VII.A). General closure standards applicable to all units are described in Section 2.0 of this closure plan. Procedures specific to each type of unit are described in Section 3.0.

### 1.2 Wastes Managed On Site

Wastes managed on site are listed on Table IV.B - Wastes Managed In Permitted Units (see Part B Section 4 of this renewal application). Wastes managed at the site have included and will include the chemical constituents of the characteristically hazardous wastes included on Table IV.B as well as the chemical constituents which served as the basis for the listed hazardous wastes codes.

## 2.0 GENERAL REQUIREMENTS

### 2.1 Closure Performance Standards

By implementing the closure procedures described below, individual waste management units or the entire facility will be closed in a manner that minimizes the need for care after closure and ensures that the unit(s) will not pose a future threat to human health and the environment, as required by 40 CFR 264.111.

To achieve this performance standard, closures will involve removal and disposal of wastes and waste residues from each unit, decontamination of the unit and associated equipment, and verification of decontamination. Attainment of closure standards will be documented in reports discussed further below.

**2.2 Partial and Final Closures**

*2.2.1 Partial Closure*

Circumstances which may prompt closure of an individual waste management unit (i.e., partial closures) may include i) modification to facility operations; or ii) the end of the useful service life of the unit.

*2.2.2 Final Closure*

Final facility closure will be implemented after all individual hazardous waste management units are taken out of service. Although it is anticipated that individual unit closures will occur periodically throughout the operating life of the facility, the closure cost estimate (Section 5.0) has been based on the assumption that the maximum inventory of hazardous wastes is present at the time of facility closure.

After final closure of the facility TMCC will conduct a RCRA Facility Investigation (RFI) as specified in a TCEQ letter dated 22 December 2008 (see Attachment IX.3 of Section XI - Releases from Solid Waste Units and Corrective Action). The RFI will evaluate the potentially impacted soils beneath the areas of former and current tanks. Additional information on previous evaluations of site conditions is provided in Section IX.

**2.3 Schedule**

Operation and subsequent closure of individual permitted units will depend upon actual TMCC waste management needs and requirements; therefore, no date has been set for the closures. An estimated schedule prepared in accordance with the time limits specified in 40 CFR 264.112, 113, 115, and TCEQ guidance is provided below. This schedule will be followed for unit closures as well as final facility closure.

<b>Time from Final Waste Receipt</b>	<b>Closure Task Description</b>
10 to 45 days prior to final waste receipt and initiation of closure activities	Provide written notice to TCEQ Region and Central Office of intent to close unit: <ul style="list-style-type: none"> <li>• Unit Closure: Provide notice at least 10 days prior to closure activities [TCEQ, 2009a]. A schedule for confirmation sampling will either be included with the notice or will be submitted separately.</li> <li>• Final Facility Closure: Provide notice at least 45 days prior to final waste receipt [40 CFR 264.112(d)].</li> </ul>
0 days	Discontinue receipt of hazardous waste and commence closure.
90 days	Remove and dispose of waste at authorized on-site or off-site facility [40 CFR 264.113(a)].
120 days	Complete decontamination process.
180 days	Complete closure activities [40 CFR 264.113(b)].
240 days	Submit closure certification to the TCEQ. Closure certification reports will be submitted for final facility closure [40 CFR 264.115] as well as for individual unit closures.

Although not anticipated, the closure process may require longer than the 90 day period allowed in 40 CFR Subpart G for waste inventory removal or the 180 day period allowed for completion of closure activities. If a longer period is required, an extension request will be submitted to the TCEQ.

### 3.0 CLOSURE PROCEDURES

#### 3.1 Container Storage Areas

Closure of permitted container storage areas will be conducted in accordance with 40 CFR 264.178, as adopted by 30 TAC 335.152(a)(7), as well as 30 TAC 350, if necessary, and appropriate technical guidance. To ensure that closures are completed in accordance with the closure plan, the activities will be supervised by TMCC and reviewed by an independent professional engineer registered in Texas.

The overall schedule for closure is provided in Section 2.3 above. Specific steps include the following:

- *Notification:* Notification of the intent to close the unit will be submitted to the TCEQ.
- *Waste Removal and Disposal:* Hazardous wastes remaining in the unit at the time of closure will be removed and disposed in accordance with applicable regulations including Land Disposal Restrictions (LDR) referenced in 40 CFR Part 268. Visible waste residues from secondary containment structures will be removed after all bulk or containerized wastes are removed.

Hazardous wastes may be disposed in the permitted on-site injection well. Wastes or waste residues that cannot be managed on-site will be removed from the facility by truck or rail, and will be disposed at authorized off-site facilities.

- *Decontamination:* Equipment used for removal, storage, and transport of hazardous waste during closure will be decontaminated. The wash water generated during the decontamination process will be treated and/or disposed in the on-site injection well or at another authorized facility.
- *Verification of Decontamination:* At the end of the decontamination process, rinsate samples will be collected. The samples will be analyzed and results evaluated as described in Section 4.0 below. The decontamination process will be repeated, as needed, until the verification samples meet regulatory requirements. As noted in Section 2.3 (Schedule), the TCEQ Regional Office will be provided initial notice of the closure activities including verification sampling.
- *Inspection:* After closure activities are completed, the container storage area will be visually inspected for evidence of contamination or cracks or gaps that could constitute pathways for release of hazardous waste or waste constituents to the environment. Facility operating records will be reviewed to determine whether releases occurred

during the operating life of the unit. Evidence of a potential release will consist of records in the facility operating record or other visual evidence that a spill has occurred and has not been cleaned up in accordance with applicable regulatory or permit requirements. If evidence of a potential release is identified, TMCC will conduct follow-up actions in accordance with 30 TAC 327 or 30 TAC 350, as appropriate.

- *Closure Certification:* A report describing the closure activities will be prepared and submitted to the TCEQ in accordance with the schedule in Section 2.3.

### 3.2 Tanks

Tank closures will be conducted in accordance with 40 CFR 264.197, as adopted by 30 TAC 335.152(a)(8), as well as 30 TAC 350, if necessary, and appropriate technical guidance. To ensure that closures are completed in accordance with the closure plan, the activities will be supervised by TMCC and reviewed by an independent professional engineer registered in the State of Texas.

The overall schedule for closure is provided in Section 2.3 above. Specific steps include the following:

- *Notification:* Notification of the intent to close the unit will be submitted to the TCEQ.
- *Waste Removal and Disposal:* At the time of closure, hazardous waste receipt will be discontinued. The contents of the tank(s) and associated piping will be removed and the system flushed of remaining waste materials. Waste fluids remaining in the tanks and appurtenances will be removed for disposal either by i) pumping to a permitted on-site injection well or ii) transport to a permitted off-site disposal facility. Any waste solids collected in the tank(s) will be removed. These solids may be i) treated on-site to meet applicable requirements of 40 CFR Part 268 and sent off site to an authorized disposal facility, or ii) sent off site for treatment, if necessary, and authorized disposal.
- *Decontamination:* On the basis of operating plans at the time of closure, equipment for the tank(s) will be managed in one of the following ways: i) decontamination and retention in service; ii) decontamination, demolition, and salvage; or iii) demolition and disposal. Various components of the tank system may be managed in different ways (e.g., some items may be salvaged and others disposed). The tank(s), piping, and appurtenances will be decontaminated by steam cleaning, pressure washing, or other appropriate methods. Pumps, piping, and other mechanical equipment will be flushed and salvaged or left in place. The decontamination process will typically involve a triple-rinse of the tanks and appurtenances using water or another solvent, if necessary.

Equipment used during closure operations will be decontaminated by pressure washing, steam cleaning, or other appropriate methods.

The rinsate generated during the decontamination process may be disposed in a permitted on-site injection well. Wastes or waste residues that cannot be managed on-site will be disposed at an authorized off-site facility. Wastes (e.g., solids) to be

land disposed will be treated as necessary to meet applicable Land Disposal Restrictions per 40 CFR Part 268.

- *Verification of Decontamination:* At the end of the decontamination process, rinsate samples will be collected. The samples will be analyzed and results evaluated as described in Section 4.0 below. The decontamination process will be repeated as needed until the verification samples meet regulatory requirements. As noted in Section 2.3 (Schedule), the TCEQ Region Office will be provided initial notice of the closure activities including verification sampling.
- *Inspection:* After completion of the tank cleaning process, the tank area will be visually inspected for evidence of contamination or cracks or gaps that could constitute pathways for release of hazardous waste or waste constituents to the environment. Facility operating records will be reviewed to determine whether releases occurred during the operating life of the unit. Evidence of a potential release will consist of records in the facility operating record or other visual evidence that a spill has occurred and has not been cleaned up in accordance with applicable regulatory or permit requirements. If evidence of a potential release is identified, TMCC will conduct follow-up actions in accordance with 30 TAC 327 or 30 TAC 350, as appropriate.
- *Closure Certification:* A report describing the closure activities will be prepared and submitted to the TCEQ in accordance with the schedule in Section 2.3.

### 3.3 Secondary Containment Areas

The secondary containment areas at the TMCC facility provide secondary containment for hazardous waste management units, which may include permitted and permit-exempt units.

Secondary containment areas include the following permitted tanks: i) Tanks F-1A, F-2A, T-28, T-30, T-31, T-32, T-33 (proposed in this permit application) and V-1; ii) Tanks T-1A, T-2A, and T-29; and iii) Tanks T-7A, T- 8A, T-12A, and T-14A. The containment areas will be closed after all waste management activities within the areas have been discontinued and the units closed.

The closure process will follow the timeline outlined in Section 2.3. Specific steps include the following:

- *Notification:* Notification of the intent to close will be submitted to the TCEQ.
- *Decontamination:* Hard-surfaced areas will be decontaminated by steam cleaning, pressure washing, or other appropriate methods. Equipment used to clean the containment areas will also be decontaminated. The rinsate generated during the decontamination process may be disposed in the permitted on-site injection well. Wastes or waste residues that cannot be managed on-site will be disposed at an authorized off-site facility. Wastes (e.g., solids) to be land disposed will be treated as necessary to meet applicable Land Disposal Restrictions per 40 CFR Part 268.

- *Verification of Decontamination:* At the end of the decontamination process, rinsate samples will be collected. The samples will be analyzed and results evaluated as described in Section 4.0 below. The decontamination process will be repeated, as needed, until the verification samples meet regulatory requirements. As noted in Section 2.3 (Schedule), the TCEQ Region Office is provided initial notice of the closure activities including verification sampling.
- *Inspection:* After completion of the cleaning process, the area will be visually inspected for evidence of contamination or cracks or gaps that could constitute pathways for release of hazardous waste or waste constituents to the environment. Facility operating records will be reviewed to determine whether releases occurred during the operating life of the unit from unit(s) formerly situated within the containment area or from the containment area itself. Evidence of a potential release will consist of records in the facility operating record or other visual evidence that a spill has occurred and has not been cleaned up in accordance with applicable regulatory or permit requirements. If evidence of a potential release is identified, TMCC will conduct follow-up actions in accordance with 30 TAC 327 or 30 TAC 350, as appropriate.
- *Closure Certification:* A report describing the closure activities will be prepared and submitted to the TCEQ in accordance with the schedule in Section 2.3. Reports concerning containment areas may be combined with unit-specific closure reports.

#### 4.0 ATTAINMENT OF CLOSURE STANDARDS

Samples, such as rinsate samples, will be collected to verify whether each container storage area, tank, or secondary containment area has been adequately decontaminated during the closure process. Because of the potentially broad spectrum of wastes managed over the lifetime of a unit at TMCC, indicator parameters have been selected to evaluate the adequacy of decontamination. Therefore, rinsate samples will be analyzed for the following if relevant to the material stored: i) pH; ii) RCRA metals; and iii) Total Petroleum Hydrocarbons (TPH) by Method TX1005. TPH by Method TX1005 will be used to provide concentrations of total hydrocarbon boiling point ranges, typically between C6 and C28. These ranges correspond to TCEQ-calculated, risk-based criteria which will be used to determine whether the closure standard has been met.

Decontamination will be considered complete when no visible evidence of contamination is observed and when the results from verification sampling and analysis indicate that concentrations of RCRA metals and TPH are below Remedy Standard A Protective Concentration Levels (PCLs) as specified in the Texas Risk Reduction Program rules (TRRP; 30 TAC 350), and pH of the rinsate is within the range of 6-9. Institutional controls such as deed recordation will be implemented as required under TRRP in the event that concentrations of COCs are evaluated with respect to Standard A commercial/industrial PCLs, rather than residential PCLs.

## 5.0 CLOSURE COST ESTIMATES

### 5.1 Basis for Closure Cost Estimates

For the purpose of preparing financial assurance documentation, cost estimates have been prepared for container storage areas, tanks, and secondary containment areas on the TMCC facility (see Tables VII.B.1 through VII.B.3, respectively). Third-party unit rates for labor and equipment, transportation, waste disposal, laboratory analyses, and certification are provided on Table VII.B.4. Closure costs for all units are summarized on Table VII.E.1. Calculations and assumptions for the cost estimates are provided below.

### 5.2 Assumptions

In accordance with TCEQ guidance (e.g., TCEQ, 2011 and 2017), closure costs have been estimated based on a scenario of facility abandonment at full permitted capacity (i.e., a scenario that would make closure the most expensive). This scenario assumes that no operable on-site equipment is available, all wastes are shipped and disposed off site, and that the closure activities are conducted by a third party. Unit rates for closure activities, including labor and equipment for waste removal, transport, and disposal, have been obtained from contractors utilized by TMCC for such work (see Table VII.B.4). Conservative assumptions used for preparing the closure cost estimates are as follows.

#### 5.2.1 Container Storage Areas

For closure cost estimates, container storage areas have been assumed to be storing the maximum permitted volume of waste at the time of closure. For most waste streams, the waste has been assumed to be present in drums which are removed from the unit for off-site disposal without removing the waste from the drums. However, for characteristic and listed sludges and solids which are stored in larger containers, the waste will be bulked into roll-off boxes prior to off-site management.

Off-site management includes the following options for wastes removed from container storage areas: i) incineration, ii) injection well, iii) landfilling of hazardous wastes, and iv) landfilling of non-hazardous wastes. The percentage of each type of waste to be disposed by each of these options at the time of facility closure was estimated by reviewing disposal practices for the past five years at TMCC (see Table VII.B.1). The volume of decontamination rinsate to be disposed has been estimated as the volume corresponding to a depth of 0.05 ft over the entire area of the unit. Decontamination rinsate will be transported off site for disposal in a permitted injection well.

#### 5.2.2 Tanks

For closure cost estimates, tanks have been assumed to be storing the maximum permitted volume of waste at the time of closure. Of the waste volume in the tank, 98% is assumed to be liquid and 2% is assumed to be sludge; however, the sludge volume is assumed to be no greater than 5,000 gallons. The volume of decontamination rinsate is equal to 5% of the tank volume. Liquid tank contents and decontamination rinsate will be

disposed and managed in accordance with applicable regulations under 40 CFR 262.11 and 262.20-22.

### 5.2.3 Containment Areas

Wastes will have been removed from tanks within each containment area at the time of closure; therefore, no waste will need to be removed from the containment areas. Each containment area will be decontaminated by rinsing with a volume of water estimated as the volume corresponding to a depth of 0.05 ft over the entire area of the unit. Decontamination rinsate will be transported off site for disposal in a permitted injection well.

## 6.0 REFERENCES

TCEQ, 2009, TRRP Compatibility with RCRA, RG-366/TRRP-03, Revised March 2009.

TCEQ, 2011, Closure of Waste-Management Units Subject to TRRP, RG-366/TRRP-2A, Remediation Division, July 2011.

TCEQ, 2017, Technical Guideline No. 10, Topic: Closure and Post-Closure Care Cost Estimates, Issued 12 October 1984, Revised 7 December 2017.

**PART B SECTION VII  
CLOSURE AND POST-CLOSURE PLANS**

**Hazardous Waste Permit Renewal Application**

Hazardous Waste Permit No. 50372  
TM Corpus Christi Services Limited Partnership, Corpus Christi, Texas

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**TABLES**

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Table VII.A	Unit Closure
Table VII.B.1	Unit Closure Cost: Container Storage Areas
Table VII.B.2	Unit Closure Cost: Tanks
Table VII.B.3	Unit Closure Cost: Secondary Containment Areas
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Table VII.C.5	Land-Based Units Closed Under Interim Status <i>(not applicable)</i>
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Table VII.E.1	Permitted Unit Closure Cost Summary
Table VII.E.2	Permitted Unit Post-Closure Cost Summary <i>(not applicable)</i>

### Table VII.A. - Unit Closure

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

Equipment or HWM Unit	Possible Methods of Decontamination <sup>1</sup>	Possible Methods of Disposal <sup>1</sup>
Container Storage Building	Pressure Wash	Contents and wash water to disposal well
Covered Roll-off Box Area	Pressure Wash	Contents and wash water to disposal well
Container Storage Area 2	Pressure Wash	Contents and wash water to disposal well
Container Storage Area 3	Pressure Wash	Contents and wash water to disposal well
F-1A	Pressure Wash	Contents and wash water to disposal well
F-2A	Pressure Wash	Contents and wash water to disposal well
T-1A	Pressure Wash	Contents and wash water to disposal well
T-2A	Pressure Wash	Contents and wash water to disposal well
T-7A	Pressure Wash	Contents and wash water to disposal well
T-8A	Pressure Wash	Contents and wash water to disposal well
T-12A	Pressure Wash	Contents and wash water to disposal well
T-14A	Pressure Wash	Contents and wash water to disposal well
V-1	Pressure Wash	Contents and wash water to disposal well
T-28	Pressure Wash	Contents and wash water to disposal well
T-29	Pressure Wash	Contents and wash water to disposal well
T-30	Pressure Wash	Contents and wash water to disposal well
T-31 (formerly V-5A/V-6A)	Pressure Wash	Contents and wash water to disposal well
T-32 (formerly V-7A/V-8A)	Pressure Wash	Contents and wash water to disposal well
T-33	Pressure Wash	Contents and wash water to disposal well

<sup>1</sup>Applicants may list more than one appropriate method.

**Table VII.B.1 - Unit Closure Cost: Container Storage Areas**

Unit ID	Permit Unit No.	Permitted Capacity (gallons)	Area (sq ft)	Decon Rinsate Volume (gallons)	Cost Factors	Waste Removal and Transportation				Waste Disposal				Secondary Containment Decontamination			Certification	Unit Closure Cost	10% Contingency	Unit Closure Cost (incl. 10% Contingency)
						Characteristic Sludges & Solids: Oxidation, Stabilization & Landfill	Listed Sludges & Solids: Incineration	Non-Hazardous Liquids & Sludges: Solidification & Landfill	Hazardous Liquids: Landfill	Characteristic Sludges & Solids: Oxidation, Stabilization & Landfill	Listed Sludges & Solids: Incineration	Non-Hazardous Liquids & Sludges: Solidification & Landfill	Hazardous Liquids: Injection Well	Triple Rinsing, Rinsate Removal, & Laboratory Analysis	Rinsate Transportation (Non-Hazardous)	Rinsate Disposal (Non-Hazardous): Injection Well	Inspection & Certification by P.E.			
% of Permitted Capacity:						50%	40%	5% (note 1)	5% (note 1)	50%	40%	5% (note 1)	5% (note 1)	—	—	—	—	—	—	—
Unit Rate:						\$0.11/gal	\$0.40/gal	\$0.75/gal	\$0.75/gal	\$1.15/gal	\$3.49/gal	\$1.26/gal	\$0.23/gal	\$0.13/sq ft	\$0.09/gal	\$0.23/gal	\$ 1,300	—	—	—
<b>Active Container Storage Areas</b>																				
Container Storage Building	1	13,640	4,550	1,702	—	\$ 750	\$ 2,182	\$ 512	\$ 512	\$ 7,843	\$ 19,041	\$ 859	\$ 157	\$ 592	\$ 153	\$ 391	\$ 1,300	\$ 34,292	\$ 3,429	\$ 37,700
Covered Roll-off Box Area (note 1)	2	4,040	796	298	—	\$ 222	\$ 646	\$ -	\$ -	\$ 2,323	\$ 5,640	\$ -	\$ -	\$ 103	\$ 27	\$ 68	\$ 1,300	\$ 10,329	\$ 1,033	\$ 11,400
Covered Roll-off Box Area (note 1)	3	4,040	See Note 3	—	—	\$ 222	\$ 646	\$ -	\$ -	\$ 2,323	\$ 5,640	\$ -	\$ -	See Note 3			See Note 3	\$ 8,831	\$ 883	\$ 9,700
Container Storage Area 2	36	5,427	3,000	1,122	—	\$ 298	\$ 868	\$ 204	\$ 204	\$ 3,121	\$ 7,576	\$ 342	\$ 62	\$ 390	\$ 101	\$ 258	\$ 1,300	\$ 14,724	\$ 1,472	\$ 16,200
<b>Proposed Container Storage Area</b>																				
Container Storage Area 3	41	8,080	796	298	—	\$ 444	\$ 1,293	\$ -	\$ -	\$ 4,646	\$ 11,280	\$ -	\$ -	\$ 103	\$ 27	\$ 68	\$ 1,300	\$ 19,161	\$ 1,916	\$ 21,100

Notes:

1. The Covered Roll-off Box Area only stores wastes containing no free liquids, and these wastes are typically stored in roll-off boxes. The permitted capacity listed in this table is in gallons (4,040 gallons), which has been converted from cubic yards (each unit permitted for a 20 cubic yard roll-off box).
2. Volume of rinsate was estimated as a 0.05-ft depth over the area of the secondary containment area. Rinsate for secondary containment was assumed to be non-hazardous.
3. The Covered Roll-off Box Units are co-located on the same area with the dimensions of 39.8 ft x 20 ft (796 sq ft). Therefore, in the calculation of the cost for Secondary Containment Decontamination, it is assumed that both units would be closed simultaneously, so costs to decontaminate the secondary containment and certify the closure are only accounted for once.
4. See Table VII.B.4 for unit rates and sources.
5. Unit closure costs have been rounded to the nearest \$100.

**Table VII.B.2 Unit Closure Cost: Tanks**

Unit ID	Permit Unit No.	Permitted Capacity (gallons)	Manages Listed or Characteristic Hazardous Wastes?	Cost Factors	Waste Removal			Waste Transportation			Waste Disposal			Laboratory Analysis (2 per unit)	Inspection and Certification by Professional Engineer	Unit Closure Cost	10% Contingency	Unit Closure Cost (incl. 10% Contingency)
					Labor and Equipment for Waste Transfer & Loading	Labor and Equipment for Sludge Removal	Labor and Equipment for Tank Decontamination	Liquid Contents of Tank (Hazardous)	Hazardous Sludges: Characteristic or Listed	Decontamination Rinsate: Non-Hazardous or Listed	Liquid Contents of Tank (Hazardous): Injection Well	Sludge Removed From Tank: Characteristic to Landfill or Listed to Incineration	Decontamination Rinsate (Non-Hazardous): Injection Well					
% of Tank Volume					98%	2%; max 5,000 gal	5%	98%	2%; max 5,000 gal	5%	98%	2%; max 5,000 gal	5%	—	—	—	—	—
Unit Rate					\$0.08/gal	\$0.12/gal	\$0.10/gal	\$0.24/gal	Note 2	Note 3	\$0.23/gal	Note 2	\$0.23/gal	\$ 110	\$ 1,300	—	—	—
<b>Active Tanks</b>																		
F-1A	32	5,100	Listed	—	\$ 400	\$ 12	\$ 26	\$ 1,200	\$ 33	\$ 61	\$ 1,150	\$ 356	\$ 59	\$ 220	\$ 1,300	\$ 4,817	\$ 482	\$ 5,300
F-2A	33	5,100	Listed	—	\$ 400	\$ 12	\$ 26	\$ 1,200	\$ 33	\$ 61	\$ 1,150	\$ 356	\$ 59	\$ 220	\$ 1,300	\$ 4,817	\$ 482	\$ 5,300
T-1A	4	204,400	Listed	—	\$ 16,025	\$ 491	\$ 1,022	\$ 48,075	\$ 1,308	\$ 2,453	\$ 46,072	\$ 14,267	\$ 2,351	\$ 220	\$ 1,300	\$ 133,584	\$ 13,358	\$ 146,900
T-2A	5	204,400	Listed	—	\$ 16,025	\$ 491	\$ 1,022	\$ 48,075	\$ 1,308	\$ 2,453	\$ 46,072	\$ 14,267	\$ 2,351	\$ 220	\$ 1,300	\$ 133,584	\$ 13,358	\$ 146,900
T-7A	10	19,850	Listed	—	\$ 1,556	\$ 48	\$ 99	\$ 4,669	\$ 127	\$ 238	\$ 4,474	\$ 1,386	\$ 228	\$ 220	\$ 1,300	\$ 14,345	\$ 1,435	\$ 15,800
T-8A	11	121,600	Listed	—	\$ 9,533	\$ 292	\$ 608	\$ 28,600	\$ 778	\$ 1,459	\$ 27,409	\$ 8,488	\$ 1,398	\$ 220	\$ 1,300	\$ 80,085	\$ 8,009	\$ 88,100
T-12A	15	30,400	Listed	—	\$ 2,383	\$ 73	\$ 152	\$ 7,150	\$ 195	\$ 365	\$ 6,852	\$ 2,122	\$ 350	\$ 220	\$ 1,300	\$ 21,162	\$ 2,116	\$ 23,300
T-14A	17	30,400	Listed	—	\$ 2,383	\$ 73	\$ 152	\$ 7,150	\$ 195	\$ 365	\$ 6,852	\$ 2,122	\$ 350	\$ 220	\$ 1,300	\$ 21,162	\$ 2,116	\$ 23,300
V-1	24	20,300	Listed	—	\$ 1,592	\$ 49	\$ 102	\$ 4,775	\$ 130	\$ 244	\$ 4,576	\$ 1,417	\$ 233	\$ 220	\$ 1,300	\$ 14,638	\$ 1,464	\$ 16,100
T-28	40	10,000	Listed	—	\$ 784	\$ 24	\$ 50	\$ 2,352	\$ 64	\$ 120	\$ 2,254	\$ 698	\$ 115	\$ 220	\$ 1,300	\$ 7,981	\$ 798	\$ 8,800
T-29	6	204,400	Listed	—	\$ 16,025	\$ 491	\$ 1,022	\$ 48,075	\$ 1,308	\$ 2,453	\$ 46,072	\$ 14,267	\$ 2,351	\$ 220	\$ 1,300	\$ 133,584	\$ 13,358	\$ 146,900
T-30	18	19,630	Listed	—	\$ 1,539	\$ 47	\$ 98	\$ 4,617	\$ 126	\$ 236	\$ 4,425	\$ 1,370	\$ 226	\$ 220	\$ 1,300	\$ 14,204	\$ 1,420	\$ 15,600
T-31 (formerly V-5A/V-6A)	27	8,830	Listed	—	\$ 692	\$ 21	\$ 44	\$ 2,077	\$ 57	\$ 106	\$ 1,990	\$ 616	\$ 102	\$ 220	\$ 1,300	\$ 7,225	\$ 723	\$ 7,900
T-32 (formerly V-7A/V-8A)	29	14,680	Listed	—	\$ 1,151	\$ 35	\$ 73	\$ 3,453	\$ 94	\$ 176	\$ 3,309	\$ 1,025	\$ 169	\$ 220	\$ 1,300	\$ 11,005	\$ 1,101	\$ 12,100
<b>Proposed Tanks</b>																		
T-33	42	19,630	Listed	—	\$ 1,539	\$ 47	\$ 98	\$ 4,617	\$ 126	\$ 236	\$ 4,425	\$ 1,370	\$ 226	\$ 220	\$ 1,300	\$ 14,204	\$ 1,420	\$ 15,600

- Notes:
1. See Table VII.B.4 for unit rates and sources.
  2. Costs vary depending on whether tank manages listed or characteristically hazardous waste. See Table VII.B.4.
  3. Decontamination rinsate from tanks managing characteristic waste assumed to be non-hazardous. Decontamination rinsate from tanks managing listed wastes assumed to be listed.
  4. Unit closure costs have been rounded to the nearest \$100.

**Table VII.B.3 - Unit Closure Cost: Secondary Containment Areas**

Unit ID	Permit Unit No.	Permitted Capacity (gallons)	Area (sq ft)	Decontamination Rinsate Volume (gallons)	Cost Factors	Decontamination and Waste Disposal			Laboratory Analysis (2 per unit)	Inspection and Certification by P.E.	Unit Closure Cost	10% Contingency	Unit Closure Cost (incl. 10% Contingency)
						Triple Rinsing, Rinsate Removal	Rinsate Transportation (Non-Hazardous)	Rinsate Disposal: Injection Well					
					Unit Rate	\$0.13/sq ft	\$0.09/gal	\$0.23/gal	\$ 110	\$ 1,300	—	—	—
F-1A, F-2A, T-28, T-30, T-31, T-32, V-1, T-33	NA	NA	14,618	5,467	—	\$ 1,900	\$ 492	\$ 1,258	\$ 220	\$ 1,300	\$ 5,170	\$ 517	\$ 5,700
T-1A, T-2A, T-29	NA	NA	10,266	3,840	—	\$ 1,335	\$ 346	\$ 883	\$ 220	\$ 1,300	\$ 4,084	\$ 408	\$ 4,500
T-7A, T-8A, T-12A, T-14A	NA	NA	11,124	4,161	—	\$ 1,446	\$ 374	\$ 957	\$ 220	\$ 1,300	\$ 4,297	\$ 430	\$ 4,700

Notes:

1. Volume of rinsate was estimated as a 0.05-ft depth over the area of the secondary containment area.
2. Costs for removal and subsequent management and disposal of wastes contained in permitted tanks are provided on Table VII.B.2.
3. These secondary containment areas are not permitted as Container Storage Areas, but only serve as secondary containment for permitted tanks.  
Therefore, for these secondary containment areas, only closure of the concrete containment area is required. Rinsate is assumed to be non-hazardous.
4. Tank T-33 is a proposed unit in this Hazardous Waste Permit Application.
4. See Table VII.B.4 for unit rates and sources.
5. Unit closure costs have been rounded to the nearest \$100.
6. NA = Not Applicable.

**Table VII.B.4 Closure Cost Estimate: Unit Rates**

	Cost for Closure Estimate		Quote from Vendor		Reference		
	Unit Cost	Unit	Unit Cost	Unit	Company	Contact	Telephone
<b>1. Container Storage Areas</b>							
<b>Waste Removal and Transportation</b>							
Characteristic sludges & solids: oxidation, stabilization, & landfill	\$ 0.11	gal					
Waste removal and bulking to roll-off box	\$ 0.04	gal	\$ 0.04	gal	Miller Environmental	Mario Ledesma	361-289-9800
Waste transportation	\$ 0.07	gal	\$ 350	25-cu yd roll-off	US Ecology Texas	Glenda Felkner	830-693-7733
Listed sludges and solids: incineration	\$ 0.40	gal					
Waste removal and bulking to roll-off box	\$ 0.04	gal	\$ 0.04	gal	Miller Environmental	Mario Ledesma	361-289-9800
Waste transportation	\$ 0.36	gal	\$ 1,800	25-cu yd roll-off	Sprint Waste	Wade Haynes	361-387-4180
Non-hazardous liquids and sludges: solidification and landfill	\$ 0.75	gal	\$ 1,030	25-drum load	US Ecology Texas	Glenda Felkner	830-693-7733
Hazardous liquids: landfill	\$ 0.75	gal	\$ 1,030	25-drum load	US Ecology Texas	Glenda Felkner	830-693-7733
<b>Waste Disposal</b>							
Characteristic sludges and solids: oxidation, stabilization, & landfill	\$ 1.15	gal	\$ 230	ton	US Ecology Texas	Glenda Felkner	830-693-7733
Listed solids and sludges: incineration	\$ 3.49	gal	\$ 0.35	lb	Veolia	Margie Ratcliff	281-425-7167
Non-hazardous liquids and sludges: solidification and landfill	\$ 1.26	gal	\$ 1.26	gal	US Ecology Texas	Glenda Felkner	830-693-7733
Hazardous liquids: injection well	\$ 0.23	gal	\$ 0.23	gal	TM Deer Park	Frank Marine	281-930-2500
<b>Secondary Containment Decontamination</b>							
Triple rinsing, rinsate removal, and laboratory analysis	\$ 0.13	sq ft	\$ 0.13	sq ft	Miller Environmental	Mario Ledesma	361-289-9800
Rinsate transportation (non-hazardous)	\$ 0.09	gal	\$ 450	5000-gal load	Sprint Waste	Wade Haynes	361-387-4180
Rinsate disposal (non-hazardous): injection well	\$ 0.23	gal	\$ 0.23	gal	TM Deer Park	Frank Marine	281-930-2500
<b>2. Tanks</b>							
<b>Waste Removal</b>							
Labor and equipment for waste transfer and loading	\$ 0.08	gal	\$ 0.08	gal	Miller Environmental	Mario Ledesma	361-289-9800
Labor and equipment for sludge removal	\$ 0.12	gal	\$ 0.12	gal	Miller Environmental	Mario Ledesma	361-289-9800
Labor and equipment for tank decontamination	\$ 0.10	gal	\$ 0.10	gal	Miller Environmental	Mario Ledesma	361-289-9800
<b>Waste transportation</b>							
Transportation of liquid contents of tank (hazardous): injection well	\$ 0.24	gal	\$ 1,200	5000-gal load	Sprint Waste	Wade Haynes	361-387-4180
Transportation of hazardous sludges							
Characteristically Hazardous	\$ 0.07	gal	\$ 350	25-cu yd roll-off	US Ecology Texas	Glenda Felkner	830-693-7733
Listed Hazardous	\$ 0.32	gal	\$ 1,600	5000-gal load	Sprint Waste	Wade Haynes	361-387-4180
Transportation of decontamination rinsate							
Non-Hazardous	\$ 0.09	gal	\$ 450	5000-gal load	Sprint Waste	Wade Haynes	361-387-4180
Listed Hazardous	\$ 0.24	gal	\$ 1,200	5000-gal load	Sprint Waste	Wade Haynes	361-387-4180
<b>Waste disposal</b>							
Liquid contents of tank (hazardous): injection well	\$ 0.23	gal	\$ 0.23	gal	TM Deer Park	Frank Marine	281-930-2500
Sludge removed from tank							
Characteristic sludges and solids: oxidation, stabilization, & landfill	\$ 1.15	gal	\$ 230	ton	US Ecology Texas	Glenda Felkner	830-693-7733
Listed sludges: incineration	\$ 3.49	gal	\$ 0.35	lb	Veolia	Margie Ratcliff	281-425-7167
Decontamination rinsate (non-hazardous): injection well	\$ 0.23	gal	\$ 0.23	gal	TM Deer Park	Frank Marine	281-930-2500
<b>3. Containment Areas</b>							
<b>Concrete Decontamination</b>							
Triple rinsing, rinsate transportation, and laboratory analysis	\$ 0.13	sq ft	\$ 0.13	sq ft	Miller Environmental	Mario Ledesma	361-289-9800
Rinsate transportation (non-hazardous)	\$ 0.09	gal	\$ 450	5000-gal load	Sprint Waste	Wade Haynes	361-387-4180
Rinsate disposal (non-hazardous): injection well	\$ 0.23	gal	\$ 0.23	gal	TM Deer Park	Frank Marine	281-930-2500
<b>4. General Costs</b>							
Laboratory Analysis	\$ 110	analysis	\$ 110	analysis	Typical cost	—	—
Inspection and certification by a professional engineer (note 2)	\$ 1,300	certification	\$ 1,300	certification	Typical cost	—	—

## **Table VII.B.4 Closure Cost Estimate: Unit Rates**

Notes:

1. Containers of characteristic and/or listed sludges and solids are principally comprised of filter cake from on-site waste treatment having an approximate density of 1.2 g/mL.
2. For disposal of sludges removed from tanks, the cost per gallon was calculated using a density of 1.2 g/mL.
3. Inspection and certification assumes all Container Storage Areas, tanks, and secondary containment areas are closed at the same time, allowing for economies of scale in certifications.  
The unit rate of \$1,250 per closure corresponds to a total of \$26,250 for all closures.



**Table VII.D. - Unit Post-Closure Cost Estimate**

**Not applicable; no post-closure or contingent post-closure care required.**

Task	Cost
<i>(Name of permitted unit, e.g., East Landfill)</i>	
Verbal description of annual task, e.g., leachate collected ( <i>amount generated x disposal cost/unit amount</i> )	\$\$\$\$
Verbal description of annual task, e.g., cap maintenance ( <i>material needed x cost/unit amount</i> )	\$\$\$\$
Verbal description of annual task, e.g., detection monitoring system ( <i># of wells x # sample events/well/year x lab analysis cost</i> )	\$\$\$\$
Verbal description of annual task	\$\$\$\$
Other annual tasks	\$\$\$\$
Other annual tasks	\$\$\$\$
<b>Subtotal</b>	<b>\$\$\$\$,\$\$\$</b>
<b>Contingency (10% minimum)</b>	<b>\$\$\$\$</b>
<b>Total Unit Post-Closure Care Cost x 30 yrs. (or other post-closure care period)</b>	<b>\$\$\$\$,\$\$\$ (20__)</b>
<i>(Name of permitted unit, e.g., Surface Impoundment West)</i>	
Verbal description of annual task, e.g., leachate collected ( <i>amount generated x disposal cost/unit amount</i> )	\$\$\$\$
Verbal description of annual task, e.g., cap maintenance ( <i>material needed x cost/unit amount</i> )	\$\$\$\$
Verbal description of annual task, e.g., detection monitoring system ( <i># of wells x # sample events/well/year x lab analysis cost</i> )	\$\$\$\$
Verbal description of annual task	\$\$\$\$
Other annual tasks	\$\$\$\$
Other annual tasks	\$\$\$\$
<b>Subtotal</b>	<b>\$\$\$\$,\$\$\$</b>
<b>Contingency (10% minimum)</b>	<b>\$\$\$\$</b>
<b>Total Unit Post-Closure Care Cost x 30 yrs. (or other post-closure care period)</b>	<b>\$\$\$\$,\$\$\$ (20__)</b>
<b>Total Permitted Facility Closure Cost (all unit costs combined)</b>	<b>\$\$\$\$,\$\$\$ (20__)</b>

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

Existing Unit Closure Cost Estimate		
Unit	Permit Unit No.	Cost (note 2)
<b>Container Storage Areas</b>		
Container Storage Building	1	\$37,700
Covered Roll-off Box Area	2	\$11,400
Covered Roll-off Box Area	3	\$9,700
Container Storage Area 2	36	\$16,200
<b>Tanks</b>		
F-1A	32	\$5,300
F-2A	33	\$5,300
T-1A	4	\$146,900
T-2A	5	\$146,900
T-7A	10	\$15,800
T-8A	11	\$88,100
T-12A	15	\$23,300
T-14A	17	\$23,300
V-1	24	\$16,100
T-28	40	\$8,800
T-29	6	\$146,900
T-30	18	\$15,600
T-31 (formerly V-5A/V-6A)	27	\$7,900
T-32 (formerly V-7A/V-8A)	29	\$12,100
<b>Secondary Containment</b>		
F-1A, F-2A, T-28, T-30, T-31, T-32, T-33, V-1	NA	\$5,700
T-1A, T-2A, T-29	NA	\$4,500
T-7A, T-8A, T-12A, T-14A	NA	\$4,700
Total Existing Unit Closure Cost Estimate		\$752,200 (in 2019 Dollar)

Proposed Unit Closure Cost Estimate		
Unit	Permit Unit No.	Cost (note 2)
<b>Container Storage Area</b>		
Container Storage Area 3	41	\$21,100
<b>Tank</b>		
T-33	42	\$15,600

- As units are added or deleted from these tables through future permit amendments or modifications, the remaining itemized unit costs should be updated for inflation when re-calculating the revised total cost in current dollars.
- Closure costs for proposed units are presented in 2019 dollars.
- NA = Not applicable; units are not permitted, but rather only serve as secondary containment for the tanks listed.

**Table VII.E.2. - Permitted Unit Post-Closure Cost Summary**

**Not applicable; no post-closure or contingent post-closure care required.**

Existing Unit Post-Closure Cost Estimate	
Unit	Cost
Total Existing Unit Post-Closure Cost Estimate	\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$ (in 20__ Dollar) <sup>1</sup>

Proposed Unit Post-Closure Cost Estimate	
Unit	Cost

<sup>1</sup> As units are added or deleted from these tables through future permit amendments or modifications, the remaining itemized unit costs should be updated for inflation when re-calculating the revised total cost in current dollars.

**TM CORPUS CHRISTI SERVICES LLC  
AUDIT HANDBOOK**

**ATTACHMENT 7.3  
FINANCIAL ASSURANCE**

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March 10, 2020

Executive Director  
Texas Commission on Environmental Quality  
Attn: Mark Stoebner, MC-184  
12100 Park 35 Circle  
Austin, TX 78753

Re: Surety Bond Guaranteeing Performance No. SUR0041435  
TM Corpus Christi Services LLC

Dear Mr. Stoebner:

This letter is being provided to the TCEQ to fulfill the requirements of 30 TAC §37.221(a). Please find attached an updated Surety Bond Rider effective date of March 9, 2020, updating the original surety bond sent to you on October 29, 2018. The rider was requested to increase funds adjusted to reflect the inflationary increase of 1.8% to adjust to 2020 dollars.

Issuing Institution: Argonaut Insurance Company

Surety's Bond No: SUR0041435

Date: October 22, 2018

Facilities covered by the subject Surety Bond are as follows:

**RCRA Facility Permit**

TM Corpus Christ Services LLC

SWR No. 83093

Permit No. 50372

Facility Address: 6901 Greenwood Drive, Corpus Christi, Texas 78415

Mailing Address: P.O. Box 1914, Deer Park, Texas 77536

The amount of funds assured by the subject Surety Bond for the above RCRA facility for closure costs is \$752,200. Please note that the renewal application for the above-referenced permit is currently undergoing technical review and TMCC is anticipating its renewal in the coming months. The amount of funds presented here is from the renewal application dated June 19, 2019 as recently updated on December 6, 2019.

**Underground Injection Control (UIC) Permit**

TM Corpus Christi Services LLC

Permit No. WDW-070

Facility Address: 6901 Greenwood Drive, Corpus Christi, Texas 78415

Mailing Address: P.O. Box 1914, Deer Park, Texas

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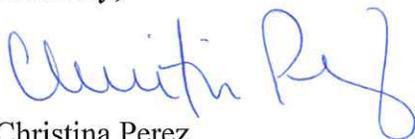
Mark Stoebner  
March 10, 2020  
Page 2 of 2

The amount of funds assured by the subject Surety Bond for the above UIC facilities for closure/post-closure costs is \$306,000. Please note that the renewal application for the above-referenced permit is currently undergoing technical review and TMCC is anticipating its renewal in the coming months. The amount of funds presented here is from the renewal application dated March 19, 2019 as recently updated on January 14, 2020.

The total of all cost estimates listed above that are guaranteed by the subject Surety Bond is \$1,058,200.

If you have any questions do not hesitate to contact me at 281-930-2593 or Mr. Kyle McClellan at 281-930-2511.

Sincerely,



Christina Perez  
Director - EHS

Enclosure

cc: Catherine A. Skurow, P.E., Plant Manager, TMCC, Corpus Christi, Texas

## SURETY BOND RIDER

To be attached and form a part of

Type of Bond: PERFORMANCE BOND

Bond No. : SUR0041435

Dated effective: 10/22/2018  
(MONTH, DAY, YEAR)

executed by: TM CORPUS CHRISTI SERVICES LIMITED PARTNERSHIP, as Principal,  
(PRINCIPAL)

and by: ARGONAUT INSURANCE COMPANY, as Surety,  
(SURETY)

and in favor of : TEXAS COMMISSION ON ENVIRONMENTAL QUALITY.  
(OBLIGEE)

In consideration of the mutual agreements herein contained the Principal and the Surety hereby consent to changing

INFORMATION	FROM	TO
Permit number, name, physical and mailing addresses, and closure, post closure, or corrective action amounts(s) for each facility guaranteed by this bond (indicate closure, post closure, or corrective action amounts separately for each facility):	WDW No. 070, Closure: \$204,677	WDW No. 070, Closure/Post-Closure: \$306,000
	SWR No. 83093, Closure: \$618,470	SWR No. 83093, Closure: \$752,200
	Total penal sum of bond: \$823,147	Total penal sum of bond: \$1,058,200
	Principal Name:  TM Corpus Christi Services Limited Partnership	Principal Name:  TM Corpus Christi Services LLC

Nothing herein contained shall vary, alter or extend any provision or condition of this bond except as herein expressly stated.

This rider is effective 03/09/2020  
(MONTH, DAY, YEAR)

Signed and Sealed 03/05/2020  
(MONTH, DAY, YEAR)

TM CORPUS CHRISTI SERVICES LLC  
PRINCIPAL

BY:  KYLE MCCLELLEN, VP-ADMINISTRATION  
ARGONAUT INSURANCE COMPANY

BY:  Mary Ann Garcia, ATTORNEY-IN-FACT  
SURETY

**Argonaut Insurance Company**  
**Deliveries Only: 225 W. Washington, 24th Floor**  
**Chicago, IL 60606**

Bond Number: SUR0041435

**United States Postal Service: P.O. Box 469011, San Antonio, TX 78246**

**POWER OF ATTORNEY**

KNOW ALL MEN BY THESE PRESENTS: That the Argonaut Insurance Company, a Corporation duly organized and existing under the laws of the State of Illinois and having its principal office in the County of Cook, Illinois does hereby nominate, constitute and appoint:

Mary Ann Garcia

Their true and lawful agent(s) and attorney(s)-in-fact, each in their separate capacity if more than one is named above, to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed any and all bonds, contracts, agreements of indemnity and other undertakings in suretyship provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed the sum of:

\$85,000,000.00

This Power of Attorney is granted and is signed and sealed under and by the authority of the following Resolution adopted by the Board of Directors of Argonaut Insurance Company:

"RESOLVED, That the President, Senior Vice President, Vice President, Assistant Vice President, Secretary, Treasurer and each of them hereby is authorized to execute powers of attorney, and such authority can be executed by use of facsimile signature, which may be attested or acknowledged by any officer or attorney, of the Company, qualifying the attorney or attorneys named in the given power of attorney, to execute in behalf of, and acknowledge as the act and deed of the Argonaut Insurance Company, all bond undertakings and contracts of suretyship, and to affix the corporate seal thereto."

IN WITNESS WHEREOF, Argonaut Insurance Company has caused its official seal to be hereunto affixed and these presents to be signed by its duly authorized officer on the 8th day of May, 2017.



Argonaut Insurance Company

by: 

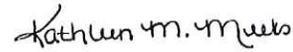
Joshua C. Betz, Senior Vice President

STATE OF TEXAS  
COUNTY OF HARRIS SS:

On this 8th day of May, 2017 A.D., before me, a Notary Public of the State of Texas, in and for the County of Harris, duly commissioned and qualified, came THE ABOVE OFFICER OF THE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of same, and being by me duly sworn, deposed and said that he is the officer of the said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said corporation, and that Resolution adopted by the Board of Directors of said Company, referred to in the preceding instrument is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand, and affixed my Official Seal at the County of Harris, the day and year first above written.





(Notary Public)

I, the undersigned Officer of the Argonaut Insurance Company, Illinois Corporation, do hereby certify that the original POWER OF ATTORNEY of which the foregoing is a full, true and correct copy is still in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand, and affixed the Seal of said Company, on the 5th day of March, 2020.





James Bluzard, Vice President-Surety

# IMPORTANT NOTICE

TO OBTAIN INFORMATION OR MAKE A COMPLAINT: YOU MAY CONTACT THE TEXAS DEPARTMENT OF INSURANCE TO OBTAIN INFORMATION ON COMPLANIES COVERAGES, RIGHTS OR COMPLAINTS AT:

1-800-252-3439

YOU MAY WRITE THE TEXAS DEPARTMENT OF INSURANCE:

P.O. BOX 149104  
AUSTIN, TX 78714-9104  
FAX # (512)475-1007

## PREMIUM OR CLAIM DISPUTES

SHOULD YOU HAVE A DISPUTE CONCERNING YOUR PREMIUM OR ABOUT A CLAIM YOU SHOULD CONTACT THE AGENT OR COMPANY FIRST. IF THE DISPUTE IS NOT RESOLVED, YOU MAY CONTACT THE TEXAS DEPARTMENT OF INSURANCE.

## ATTACH THIS NOTICE TO YOUR POLICY

THIS NOTICE IS FOR INFORMATION ONLY AND DOES NOT BECOME A PART OR CONDITION OF THE ATTACHED DOCUMENT.