JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, PH.D.
SECRETARY

RECEIVED
APR 23 2018

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

4/11/2018

Telephone: (214) 665-6750
Fax (214) 665-6762
Email: Fruitwala.Kishor@epamail.epa.gov

Mr. Kishor Fruitwala
EPA Region VI
1445 Ross Avenue
Dallas, TX 752022733

RE: Request for Public Comments on A Draft Site Specific Feedstock Variance From Classification As A Solid Waste
Thermaldyne LLC - Thermaldyne Port Allen Facility
AI198467, PER20170004, EPA ID Number LAR 000 101 236
Port Allen, West Baton Rouge Parish, Louisiana

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your review a copy of the Draft Site Specific Feedstock Variance and public notice for the above referenced facility.

The legal notice is scheduled to be published in/or announced on:

WJBO -AM 1150	*Thursday, April 19, 2018*
West Side Journal	*Thursday, April 19, 2018*
Advocate	*Thursday, April 19, 2018*

The notice is also posted on the LDEQ Website, found at www.deq.state.la.us. Written comments on this action may be submitted to Public Participation Group, LDEQ-OES, Permit Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 198467.

Should you have any questions, additional information may be obtained from Nora Lane, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact me at (225) 219-3277.

Please complete the attached 'Verification by EPA' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or fax to (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

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VERIFICATION BY EPA

The undersigned verifies that Region VI, 1445 Ross Avenue, Dallas, TX has received a copy of the Draft Site Specific Variance associated with the following public notice:

Request for Public Comments on a Hazardous Waste Site Specific Variance
Thermaldyne LLC - Thermaldyne Port Allen Facility
AI198467, PER20170004, EPA ID Number LAR 000 101 236
Port Allen, West Baton Rouge Parish, Louisiana

EPA Region VI:

By: _____ **Date:** _____

Please complete and return this form promptly to the address listed below:

Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permit Support Services Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
THERMALDYNE, LLC, THERMALDYNE PORT ALLEN FACILITY
DRAFT SITE SPECIFIC FEEDSTOCK VARIANCE FROM CLASSIFICATION AS A SOLID WASTE

The LDEQ, Office of Environmental Services, is accepting written comments on the draft "site specific feedstock variance from classification as a solid waste" for Thermaldyne, LLC, 45 Maryeanna Road, Atlanta, Georgia 30342 for the Port Allen Facility. **The facility is located at 2325 North Line Road, Port Allen, West Baton Rouge Parish.**

Thermaldyne, LLC, is seeking a site-specific variance from the classification as a solid waste in accordance with LAC 33:V.105.O.1.b and 105.O.2.b. .

Thermaldyne proposes to utilize a centrifuge process and/or a thermal desorption process to reclaim the oil from Oil Bearing Hazardous Secondary Materials (OBHSM). Centrifuges will be used to initially process low-solids OBHSM, which typically consists of mostly liquid (i.e., 70 – 90%). Thermal desorption will be used to process high-solids OBHSM, which consists of mostly solids (i.e., 40 – 70%), with the remaining volume consisting of oil and water.

This site specific feedstock variance was processed as an expedited action in accordance with LAC 33:I.Chapter 18.

Comments and requests for a public hearing or notification of the final decision can be submitted via personal delivery, U.S. mail, email, or fax. **Comments and requests for public hearings must be received by 4:30 pm CST, Monday, May 21, 2018.** Delivery may be made to the drop-box at 602 N. 5th St., Baton Rouge, LA 70802. U.S. Mail may be sent to LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. Emails may be submitted to DEQ.PUBLICNOTICES@LA.GOV and faxes sent to (225) 219-3309.

Please see additional instructions for comment submission, hand delivery and information regarding electronic submission at http://www.deq.louisiana.gov/page/the-public-participation-group or call (225) 219-3276.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The draft site specific feedstock variance from classification as a solid waste application and related documents are available for review at the LDEQ, Public Records Center, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

An additional copy may be reviewed at the West Baton Rouge Library, 830 North Alexander Avenue, Port Allen, Louisiana 70767.

Inquiries or requests for additional information regarding this draft action should be directed to Nora Lane, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3422.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at DEQ.PUBLICNOTICES@LA.GOV or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Public notices including electronic access to the draft decision and associated information can be viewed on the LDEQ permits public webpage at http://www.deq.louisiana.gov/public-notices and general information related to the public participation in permitting activities can be viewed at. http://www.deq.louisiana.gov/page/the-public-participation-group.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://louisiana.gov/Services/Email_Notifications_DEQ_PN/.

All correspondence should specify AI Number 198467, EPA ID Number LAR 000 101 236, and Activity Number PER20170004.

Scheduled Publication Date: April 19, 2018

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05/02/17

JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Agency Interest No.: 198467
EPA ID No. : LAR 000 101 236
TEMPO Activity No.: PER20170004

Mr. Ricky Cates
Thermaldyne, LLC
45 Maryeanna
Atlanta, Georgia 30342

RE: Draft Proposed Site Specific Feedstock Variance from the Classification as a Solid Waste for Oil Bearing Hazardous Secondary Materials (LAC 33:V.105.O.1.b and 105.O.2.b.)
Thermaldyne, LLC
2325 North Line Road
Port Allen, West Baton Rouge Parish, Louisiana

Dear Mr. Cates:

The Waste Permits Division has received your submittal dated December 1, 2017, and subsequent information dated February 14, and 23, 2018, requesting a feedstock variance from the classification as a solid waste for Oil Bearing Hazardous Secondary Materials (OBHSM) generated at petroleum refineries. The variance will cover the OBHSM from the point of generation at the generating refinery to the Thermaldyne facility. The recovered crude oil will not need further reclamation and will be re-inserted directly into refinery production processes.

Attached is a copy of the proposed draft decision document for the site-specific variance and additional documentation, which will be made available during a thirty (30) day comment period. A final decision document will be prepared after the end of the public comment period.

Please reference your Agency Interest No.: 198467, EPA ID No.: LAR 000 101 236, and Permit Activity No.: (PER20170004) on all future correspondence pertaining to this matter. If you have any questions, please contact Ms. Nora Lane (general questions) at (225) 219-3422 or Ms. Sarah Baquet (engineering questions) at (225) 219-3276.

Sincerely,

Elliott B. Vega
Assistant Secretary
Office of Environmental Services

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Attachment

SITE SPECIFIC FEEDSTOCK VARIANCE

Thermaldyne, LLC
2325 North Line Road
Port Allen, Louisiana 70767

West Baton Rouge Parish

Agency Interest No.: 198467
EPA ID No. : LAR 000 101 236
TEMPO Activity No.: PER20170004

FACT SHEET

FACT SHEET
DRAFT DECISION

SITE-SPECIFIC FEEDSTOCK VARIANCE

PREPARED FOR

Thermaldyne, LLC
2325 North Line Road
Port Allen, Louisiana 70767

West Baton Rouge Parish

Agency Interest No.: 198467
EPA ID No. : LAR 000 101 236
TEMPO Activity No.: PER20170004

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft site-specific variance for Thermaldyne, LLC (EPA ID Number LAR 000 101 236, Agency Interest Number 198467), located in Port Allen, West Baton Rouge Parish, Louisiana.

Thermaldyne is seeking a site-specific variance from the classification as a solid waste in accordance with LAC 33:V.105.O.1.b and 105.O.2.b. Thermaldyne proposes to utilize a centrifuge process and/or a thermal desorption process to reclaim the oil from Oil Bearing Hazardous Secondary Materials (OBHSM). Centrifuges will be used to initially process low-solids OBHSM, which typically consists of mostly liquid (i.e., 70 – 90%). Thermal desorption will be used to process high-solids OBHSM, which consists of mostly solids (i.e., 40 – 70%), with the remaining volume consisting of oil and water.

The Louisiana Department of Environmental Quality (LDEQ), under the authority granted by the Louisiana Environmental Quality Act, in particular La. R.S. 30:2014; by the Executive Reorganization Act, in particular La. R.S. 36:234; and by Section 105 of Title 33, Part V of the Louisiana Administrative Code (LAC 33:V.105), particularly LAC 33:V.105.O.1.b and 105.O.2.b, has prepared this proposed draft site-specific variance. The Administrative Authority for this variance is the Secretary of the LDEQ, or his/her designee.

On December 1, 2017, Thermaldyne submitted a feedstock variance request from the classification as a solid waste for the reclamation of OBHSM. These materials, if discarded, may be identified with one or more of the following hazardous waste codes: F037, F038, K048, K049, K050, K051, K169, K170, K171, K172, and/or other hazardous waste characteristic codes.. Pursuant to LAC 33:V.105.O.1.b and 105.O.2.b, the material, once reclaimed, will be re-inserted and used as petroleum refinery feedstock in the original production process. The submittal has been reviewed by the LDEQ Waste Permits Division and a draft decision document for a site-specific variance for this activity has been prepared for public notice and comment.

II. THE VARIANCE PROCESS

The purpose of this fact sheet is to initiate and document the variance decision process. The LDEQ Office of Environmental Services-Waste Permits Division has prepared this fact sheet to accompany the draft site-specific variance. This fact sheet and draft site-specific variance sets forth all applicable conditions with which the facility must comply.

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The variance process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the information presented in the application for the site-specific variance from the classification of a solid waste, and the draft variance, which contains the regulatory requirements that the applicant is required to comply with for the term of the feedstock variance.

The public is given a minimum of thirty (30) days to review and comment on the draft site-specific variance. The Administrative Authority, prior to making a decision or taking any final action on the draft site-specific variance, will consider all significant comments.

A. DRAFT SITE-SPECIFIC VARIANCE

The Waste Permits Division reviewed the site-specific feedstock variance request and other pertinent technical information, and prepared a draft site-specific variance that contains the language pertaining to the management of the OBHSM at the listed facility.

This draft site-specific variance is a not the final decision of the Administrative Authority. The final decision of the Administrative Authority shall be to issue or deny the site-specific variance.

B. PUBLIC COMMENT PERIOD

LAC 33:V.105.K.2.b requires that the public be given thirty (30) days to comment on the draft site-specific variance decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. To ensure consideration of your comment, any person interested in commenting on the draft site-specific variance must do so within the thirty (30) day comment period.

Public notice of the draft site-specific variance shall be published in specified newspapers and/or announced on the designated radio station.

A public hearing for the draft site-specific variance may be held if requested in writing or at the Administrative Authority's discretion. The date, location and time would be provided in separate public notice. LDEQ will hold the hearing at least thirty (30) days after the date on which the public notice is given.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents is on file at the LDEQ Public Records Center, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected (except for proprietary information granted "confidential" by the Department) and copied (at $0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays). The record may also be viewed electronically at http://edms.deq.louisiana.gov/app/doc/querydef.aspx under AI 198467.

In addition, a copy of the draft site-specific variance, fact sheet, and supporting documents are available for review at the **West Baton Rouge Library located at 830 North Alexander Avenue, Port Allen, Louisiana.**

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D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft feedstock variance to the Administrative Authority, at the address listed below, no later than the closing date of the comment period. All comments should include:

1. the name and address of the commenter,

2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,

3. identification of the facility commented on (the EPA Identification Number and AI number), and

4. supporting relevant facts upon which the comments are based.

All comments and/or further requests for information (including copies of this decision, fact sheet, and any requests by public interest groups or individuals who would like to be included in the mailing list) should be made in writing to:

Ms. Tommie Milam
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft site specific feed-stock variance should be addressed to:

Ms. Nora Lane
Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
Post Office Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3422 or fax (225) 219-3158

II. DESCRIPTION OF OVERALL SITE

The reclamation facility, owned and operated by Thermaldyne, LLC, is located at 2325 North Line Road, Port Allen, Louisiana 70767. The area is zoned *industrial, moderate*. There is no residential housing adjacent to the site.

Approximately seven acres of the 28.2-acre site will be used to reclaim OBHSM. The proposed processing area of the site is surrounded by a buffer zone exceeding 200-feet and the entire site is fenced and secure.

Primary access to the facility is from Interstate I-10, exiting south and proceeding approximately one mile on Louisiana Highway 1, then proceeding west on North Line Road. North Line Road may only be accessed from Louisiana Highway 1.

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III. RECLAMATION PROCESSING

All steps in the reclamation of OBHSM will occur upon concrete pads with secondary containment to prevent impacts to the soil and groundwater. A synthetic liner will be installed below the concrete in all process areas. The receiving area for the OBHSM will be located inside an enclosed building and, therefore, is not subject to storm water run-on/runoff. The entire perimeter of the OBHSM-handling area will have an 8-inch curb to prevent surface drainage from flowing through the operating areas of the facility.

The facility reclaims oil from OBHSM by utilizing a 3-phase centrifuge process and an indirect thermal desorption (ITD) process. The OBHSM consists of sludges, byproducts, spent or other oil-bearing materials generated at petroleum refineries. The oil that is reclaimed is returned to petroleum refineries for reinsertion into the refining process.

Residuals generated during the reclamation process (including wastewater and solids) will be managed in accordance with applicable regulations and in a manner protective of human health and the environment. The facility will operate in compliance with its minor source Air Permit No. 3120-00116-00.

Thermaldyne will collect all wastewater, i.e., water not recycled into the reclamation process in containers (e.g., frac tanks) prior to treatment in an onsite wastewater treatment system. Treated wastewater will be discharged in accordance with Thermaldyne's LPDES permit. Wastewater that is not recycled in the process or treated in the onsite system will be collected in containers and shipped offsite for treatment or disposal at a permitted facility in accordance with applicable regulations.

Residual solids will be containerized and transferred offsite for treatment and/or disposal in accordance with applicable regulations. None of the residual solids will be disposed on site.

Financial Assurance

Thermaldyne has committed to providing the financial assurance described in LAC 33:V.3707 and 3715. Thermaldyne will provide financial assurance no later than 270 days after start-up of the reclamation facility. Thermaldyne has prepared a detailed written estimate, in current dollars, of the cost of disposing any OBHSM as listed hazardous waste, and the potential cost of closing the facility as a treatment, storage, and disposal facility. The cost estimate is incorporated by Reference in Table 1 of the Feedstock Variance (and may be reviewed at EDMS Doc. # 11006091).

IV. REVIEW OF REGULATORY CRITERIA

LAC 33:V.105.O.2.b.i-vii and LAC 33:V.105.R sets forth the criteria that LDEQ uses to evaluate requests for a variance from classifying as a solid waste those materials that are reclaimed and then reused as feedstock within the original primary production process in which the materials were generated. LDEQ has reviewed each of the criteria and determined that the reclamation of OBHSM at the Thermaldyne facility meets or exceeds the requirements of LAC 33:V.105.O.2.b.i-vii. and LAC 33:V.105.R.

Please see EDMS Document # 10984054 for a complete copy of the detailed description of the criteria and responses to LAC 33:V.105.O.2.b and LAC 33:V.105.R.

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DRAFT
SIGNATURE PAGE
AND
SITE SPECIFIC
FEEDSTOCK VARIANCE
CONDITIONS

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
VARIANCE FROM CLASSIFICATION AS SOLID WASTE

Facility Name : Thermaldyne. LLC

EPA ID #: LAR 000 101 236

Agency Interest #: 198467

TEMPO Activity # : PER20170004

Type of Variance: Feedstock Variance (LAC 33:V.105.O.1.b), materials that are reclaimed and then re-used within the original production process in which they were generated.

Facility Location: 2325 North Line Road, Port Allen, Louisiana, West Baton Rouge Parish

This feedstock variance from classification as solid waste (feedstock variance) is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law La. R.S. 30:2171 et seq., and the regulations adopted there under, (LAC 33:V.105.O.1.b and LAC 33:V.105.O.2.b), to **Thermaldyne, LLC**, to reclaim oil bearing hazardous secondary materials (OBHSM), and return the recovered oil back to petroleum refinery production. This reclamation activity is authorized to be conducted at the facility located at 2325 North Line Road, Port Allen, Louisiana, West Baton Rouge Parish at latitude 30° 26' 04" N and longitude 91° 13' 56" W.

For the purposes of this feedstock variance, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality or his/her designee.

Thermaldyne must comply with all terms and conditions of this feedstock variance which consists of the conditions contained herein and the applicable regulations contained in the Louisiana Administrative Code, Title 33, Part V, Subpart I (LAC 33:V.Subpart 1.) Applicable regulations are those which are in effect on the effective date of issuance of this feedstock variance. This variance is based on the assumption that the information provided to LDEQ by the applicant is accurate. Any inaccuracies found in the submitted information may be grounds for the termination, or modification, of this feedstock variance.

Thermaldyne shall inform the LDEQ by written notification in a timely manner, of any deviation from or changes to the information in the variance request which would affect its ability to comply with applicable regulatory requirements or variance conditions. This variance may be suspended, modified, revoked, reissued or terminated for cause.

The granting of this variance does not constitute a defense against any past or future non-compliance with state or federal regulations. Additionally, the granting of this variance does not constitute Department approval for any activity or process that may require a permit.

In accordance with LAC 33:V.105.Q, the Administrative Authority may issue a variance from classification as solid waste for a duration not to exceed a maximum term of ten (10) years.

ISSUANCE DATE: _____

EXPRIATION DATE: _____

_____ _____

Elliott B. Vega, Assistant Secretary Date
Louisiana Department of Environmental Quality

SITE SPECIFIC FEEDSTOCK VARIANCE
(LAC 33:V.105.O.2.b.i-vii)

OIL BEARING HAZARDOUS SECONDARY MATERIALS (OBHSM)

Thermaldyne, LLC
2325 North Line Road,
Port Allen, Louisiana 70767

West Baton Rouge Parish

Agency Interest No.: 198467
EPA ID No. : LAR000101236
TEMPO Activity No.: PER20170004

I. MATERIALS SUBJECT TO THIS VARIANCE:

Oil Bearing Hazardous Secondary Materials (OBHSM) generated in the petroleum refining industry, as described below, are not solid wastes so long as the conditions of this variance are met:

- Dissolved air float (DAF)
- Slop oil emulsion solids
- Heat exchanger bundle cleaning sludge
- API separator sludge
- Tank bottoms (leaded)
- Crude oil tank sediment
- Clarified slurry oil tank sediment and/or in-line filter/separation solids
- Primary refinery oil/water/solids separation sludge
- Secondary (emulsified) oil/water/solids separation sludge
- Spent hydro treating catalyst
- Spent hydro refining catalyst
- Any other oil-containing secondary material (*e.g.*, spent material, by-product, or sludge)

II. DISPOSAL OR DISCARD OF OBHSM SUBJECT TO THIS VARIANCE:

If at any time the OBHSM listed in Condition I are sent for disposal prior to final reclamation, the material shall regain the hazardous waste listings and be properly disposed of at a permitted disposal facility in accordance with the Hazardous Waste Regulations. If discarded, these materials will carry the following hazardous waste codes, as applicable: F037, F038, K048, K049, K050, K051, K169, K170, K171, K172, and/or other hazardous waste characteristic codes.

III. FEEDSTOCK VARIANCE CONDITIONS

A. The management and transport of the OBHSM shall not: 1) cause a discharge or imminent threat of a discharge into or adjacent to the waters of the state 2) create and maintain a nuisance or 3) violate any applicable provisions of the Louisiana Administrative Code and the U.S. and Louisiana Department of Transportation laws and regulations.

B. Containment. All OBHSM must be contained in accordance with LAC 33:V.109.contained and managed in accordance with LAC 33:V.105.R.4 and R.7.

C. Recordkeeping. All records of how the OBHSM are reclaimed and oil returned to petroleum refineries must be maintained on site and made available, within a reasonable time, for review upon request by the administrative authority. These records must be maintained for no less than three years after operations have ceased.

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D. Generation and Disposal of Residuals. The operator must make a hazardous waste determination on any residuals generated from the reclamation of the OBHSM. The residuals are a point of new generation of material. Upon intent to be discard the residuals must be properly characterized and managed in accordance with Louisiana Solid Waste and/or Hazardous Waste Regulations, as applicable.

E. Financial Responsibility: Financial assurance voluntarily committed to by the applicant shall be finalized and supplied to the LDEQ no later than 270 days after start-up of the reclamation activities.

F. Legitimacy. All reclamation activities must comply with LAC 33:V.105.R.1-4 (legitimate recycling requirements).

G. Reporting. The operator must comply with all criteria in LAC 33:V.105.O.2.b. A notification must be sent by March 1 of every even-numbered year to the administrative authority using the hazardous waste activity form HW-1 which contains the notification information included in LAC 33:V.105.Q.1.a-i.

H. Tracking/Transportation: The materials subject to this feedstock variance are excluded from classification of solid waste, from the point of generation, transportation to the Thermaldyne facility, and reclamation conducted at the Thermaldyne facility. Feedstock materials are not required to be transported and tracked using a hazardous waste manifest, but must be transported under tracking documentation that correctly identifies the materials and the relationship between the generating facility and the receiving facility. The recovered crude oil stored on-site prior to transportation back to refinery production processes does not require further reclamation and, therefore, is not a solid waste.

I. Processing. All processing shall be in conformance with the Operation Description and Material Acceptance Plan (EDMS Doc. # 11006089) which are incorporated by reference (See Table 1). Upon arrival at Thermaldyne, the OBHSM must be processed immediately or when a sufficient quantity (approximately 20 truck loads) has been received to ensure efficient processing. The reclaimed oil will be then returned to petroleum refineries upon completion of a batch process, the lesser of a maximum of 90 days from the receipt of the OBHSM, or when a sufficient quantity has been generated.

IV. ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE

All attachments and documents required by this variance (Table 1), including all plans and schedules, are incorporated into this variance by reference and are enforceable requirements. When applicable, the owner/operator must determine if any change will require a modification to the variance whenever there is a variation in any attachment.

The applicant shall maintain, at the facility, the all variance documents and amendments, revisions, and modifications to these documents. Documents may be maintained electronically. If any variance language conflicts with the regulations, the regulations shall prevail. All documents maintained at the facility shall be made readily available for inspection upon request by the administrative authority.

Table 1: FACILITY SPECIFIC DOCUMENTS INCORPORATED BY REFERENCE, AND MAINTAINED AT THE FACILITY

Name of Plan/Document	Date	EDMS Document ID#
HW-1 Form & HSM Addendum	2/14/2018	10984054
Facility Operation Description	2/23/2018	11006089
Material Acceptance Plan	2/23/2018	11006089
Contingency Plan	2/23/2018	11006090
Closure Plan and Cost Estimate	2/23/2018	11006091
Feedstock Variance Application	12/1/2017	10886279
Response to NOD #1	2/14/2018	10984054

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