EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT

Inspection Date(s):	9-30-2014 to 10-2-2014		
Media:	RCRA		
Regulatory Program(s)	Hazardous Waste		
Company Name:	**Tubal Cain Gas Free Services, Inc.**		
Facility Name:	**Tubal Cain Gas Free Services**		
Facility Physical Location:	8000A Old Yacht Club Road		
(city, state, zip code)	Port Arthur, Texas 77642		
Mailing address:	P.O. Box 2364		
(city, state, zip code)	Beaumont, Texas 77704-2364		
County/Parish:	Jefferson County		
Facility Contact:	Randy Cooper	Operations Manager	
	randy@tcmarineservices.com		
FRS Number:			
Identification/Permit Number:	TXR000080426		
Media Number:	TCEQ Solid Waste ID #90733		
NAICS:	488320		
SIC:			
Facility Representatives:	Cade Durio	Manager of Gas Free Operations	409 962 8806
	Randy Cooper	Operations Manager	409 790 2661
	John Boyd	Yard Manager	409 962 5945
	Greg Bowman (outside consultant)	President GB Sales and Consulting	713 419 6076
	Ryke Anderson and Gina Anderson (outside consultants)	RW Anderson Incorporated	337 296 2033
	Ron Reeves	Outside Consultant	
EPA Inspectors:	David Robertson	EPA/6EN-HE	214 665 7363
	Adolphus Talton	EPA/6EN-HE	214 665 6651
State Inspector(s):	n/a		
Other Inspector(s):	n/a		
EPA Lead Inspector Signature/Date			
	David Robertson David Roberts		Date 4-27-15
Supervisor Signature/Date			
	Guy Tidmore		Date 4/27/15

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors David Robertson and Adolphus Talton arrived at the Tubal-Cain Gas Free Services on September 30, 2014 for an unannounced inspection. Tubal-Cain Gas Free (Gas Free) Services is a sister facility to Tubal-Cain Marine Services. Although the facilities are separated by approximately ½ mile, and each has its own office and personnel they also share some office space and personnel. Therefore, the opening conference for both facilities was conducted at Gas Free. We met with Cade Durio, Manager, Tubal-Cain Gas Free Services and Randy Cooper, Operations Manager, Tubal-Cain Marine Services. I presented my credentials to both Mr. Durio and Mr. Cooper and informed them that this was an EPA inspection to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA). I explained that EPA Region 6 employees were in the area conducting inspections at several facilities that were suspected to be in the business of barge washing. The inspection covered on site and off site waste management, as well as management of material claimed to be "product" by the facility.

Gas Free has been in operation at this location for 3.5 years. Gas free operations were conducted at Tubal-Cain Marine Services for approximately 6 years prior to opening this location.

After initially allowing full access to the facility on September 30, 2014, Mr. Durio and Mr. Cooper stated on the morning of October 1, 2014, that they would no longer grant EPA access to their site. I explained the access provisions of RCRA and asked if they would sign a piece of paper stating why we were being denied access. Mr. Durio stated that he would like to discuss the situation with the group and asked us to step outside. Adolphus Talton and I waited outside the facility from approximately 0830 to 0910 while facility representatives discussed denial of access. I called back to the R6 office and explained the situation to management. At approximately 0910, Mr. Durio asked us to come back into the facility where full access was again provided.

According to Mr. Durio, all records are kept by the facility in electronic format. Mr. Durio stated that the computer where these records are kept crashed in 2012 and that no records are available prior to that time.

FACILITY DESCRIPTION

According to the Gas Free Services website (http://tcmarineservices.com), the facility conducts the following activities:

- product overhead stripping,
- cold, hot and chemical wash,
- strip and squeegee, slop tank/drip pan cleaning,

- bilge cleaning,
- engine room cleaning,
- flare services,
- steam services
- boiler services
- removal of glycols, acids, gasolines, benzenes, volatile organic carbons (VOCs), chlorinated solvents and other chemicals
- flaring covered under TCEQ permit by rule that meets the proposed flaring regulation 33 CFR 154 subpart B.

During the inspection, Tubal Cain employees confirmed that the above processes are still conducted at the Gas Free site. The website also asserts that the facility is permitted by the TCEQ and the USCG.

A TCEQ compliance investigation was conducted, for disturbance to a closed landfill at this site, in 2012. No formal or informal enforcement actions have been brought against this site in the last five years according to the EPA Enforcement and Compliance History Online database (ECHO).

Section II - OBSERVATIONS

I asked Mr. Durio to describe his barge cleaning process and explain how material removed from barges being cleaned is handled. Mr. Durio explained that 99% of material removed goes off site for beneficial re-use. Mr. Durio also stated that the facility has a 5 year plan to get to zero hazardous waste disposed. According to Mr. Durio, Tubal-Cain cleans barges in several steps: first, heels are removed, labeled and kept separately (chemicals in totes and oils in frac tanks), second, the barge is washed with water. Chemical barge wash water is managed in totes. Oil barge wash water is managed in frac tanks. Finally, the barge is hand cleaned removing final liquids, sludges, rust and dirt – these solids are managed in an open roll-off as described in the "Frac Tanks" section of this report. Specialized barges – like those carrying chlorinated solvents are managed using an off-site company (recently Purgit Inc). Chlorinated solvents are recovered using a vapor chiller system that removes and condenses the solvents from the barge. Bottle barges are managed by flaring where appropriate.

Heels and some other wastes are managed through waste brokers. The facility uses two main waste brokers: Mr. RW Anderson in Lafayette, Louisiana and Mr. Greg Bowman, operating as GB Sales in Houston, Texas. Mr. Anderson generally handles sales of petroleum distillates that can be sent off site without recovery other than on-site physical separation while assisting in "inventory management" as described in the "RW Anderson" section of this report. Mr. Bowman assists the facility in managing their wastes. Mr. Bowman also operates GB Sales, Value Resources, and works closely with Bluebonnet Petrochemical Services all at 6450 N. Main Street, in Baytown, Texas. These three entities attempt to "reclaim" some of Tubal Cain's waste and manage chemical heels as described later in this report.

Note on photographs. Photographs in this report are referred to by the final 2 numbers in the file name assigned by the camera when the photograph was taken. For example photograph labeled by the camera metadata as

P9300003.jpg will be referred to as Photo 3 in this report. Likewise Photo P93000056.jpg will be referred to as Photo 56. All photos are filed in Appendix 1. An overview of the facility can be seen in Photos 1-3.

Heel management

During the inspection I observed heels managed in totes and in frac tanks.

According to Mr. Durio, the facility's waste consultant, G.B. Sales which is headed by Greg Bowman, manages crude oil sales or disposal as well as making the determination as to whether a particular heel, heel and solid material or heel and wash water are a product or a waste. Mr. Durio stated that G.B. Sales makes the determination as to which materials can be blended with other products and which must be disposed. Material awaiting final use determination is accumulated in the "Tote Area". The Tote Area is surrounded by a low concrete berm and is constructed of fly ash over soil.

Material Accumulated in Tote area and time of storage based upon the date on the container. Photographs are in the photo log (Appendix 1).

Chemical name on label[1]	Photo-graph #	% Full (estimated)[2]	Condition of Container	Facility Profile # and indication	Labeled as Hazardous waste	Date on Container[3]
Styrene	6	80	Open – partially polymerized	Barge K10334 Profile available D001	No	6/25/14 97 days
Slop oil	7	80	Good	Unreadable	No – potentially "Used Oil"	3/29/14 185 days
Caustic	8	50 – 350 gallon tote	Good	Unreadable	No	6/11/14 111 days
Caustic	9	Can't tell – does contain material	Good	Unreadable	No	6/11/14 111 days
Sulfuric Acid	10	Nearly empty	Good	None – according to R Cooper, facility uses for "neutralization"	No	3/27/14 187 days
Styrene wash water	11	80	Poor, open, material appears partially polymerized	K22300	No	7/28/14 64 days
Hexmethylene-diamine	12	Not observable	Poor, 55-gallon drum closed with plastic trash	DBL89	No	8/15/14 46 days

Chemical name on label[1]	Photo-graph #	% Full (estimated)[2]	Condition of Container	Facility Profile # and indication	Labeled as Hazardous waste	Date on Container[3]
			bag			
Methyl Methacrylate	13	80	Good	IB1946	No	8/16/14 45 days
Methyl Ethyl Ketone	14	55	Good	Kirby 10557	No	9/6/14 24 days
Trichloroethylene wash water	15	75	Good	NM 1017	No	9/11/14 19 days
Trichloroethylene wash water	16	60	Good	NM 1017	No	9/11/14 19 days
No label[4]	17	80	Good	Unknown	No	Unknown

[1] Containers labeled with a chemical name only are heel. Containers labeled with a chemical name plus the words "wash water" spent wash water from cleaning the chemical listed.
[2] Unless otherwise noted, container size is 250 gallon tote.
[3] Date calculated using internet date calculator timeanddate.com.
[4] According to Thomas Tull, the unlabeled tote contains trichloroethylene wash water from NM 1017.

According to Mr. Bowman and/or documentation received during the inspection, totes containing chemical heel are managed in several ways including:

- continued use for the original purpose either on-site or off-site (caustic used for acid neutralization for example);
- blending into wastewater sent off site for disposal (generally Ecowerks or New Park);
- blending into fuels managed by Mr. Anderson;
- disposed as hazardous or non-hazardous wastes.

For example: The facility was managing 2 totes containing "trichloroethylene wash water" in the Totes area (Photos 15 and 16). I was given three different stories as to how the trichloroethylene wash water was normally handled and I have included all three below:

1) According to Randy Cooper, trichloroethylene wash water can be mixed into distillate sent off site as a fuel at a rate of 100-200 gallons per 5000 gallon load.
2) Mr. Cooper noted that trichloroethylene wash water can usually be sent off site in a few weeks after generation using the above mentioned technique. Mr. Cooper stated that TC sent out linear alkylate benzene using the same technique one day previously.
3) 2) John Boyd, Yard Manager, later stated that trichloroethylene would not be blended with distillate, but benzene could. Mr. Boyd stated that trichloroethylene is metered into water disposed by Ecowerks. Mr. Boyd stated that prior to mixing, G.B. Sales samples both the totes and the frac tank of water and lets TCGF know in what ratio to mix the two. Mr. Boyd later stated that chlorinated solvents are not sent to Ecowerks but are kept separate for disposal.

The facility was able to produce a manifest for chlorinated solvent disposal 002332782GBF which was shipped to Tradebe Treatment and Recycling of Tennessee (TND000772186) (Appendix 2). In addition, the facility disposed spent solvent at Texas Molecular via Bluebonnet Petroleum Solutions. Bluebonnet (TXR000081178) is registered as a CESQG, but does not appear to be a registered transporter of hazardous waste. Trichloroethylene wash water is a spent material and a solid waste and should be managed as a hazardous waste unless it can be re-used for its intended purpose without reclamation. The facility has a waste profile describing trichloroethylene wash water as a D039 hazardous waste (Appendix 3). The trichloroethylene wash water was not labeled with the words "hazardous waste".

The facility manages 8 frac tanks for material removed from barges during cleaning or generated on-site and one frac tank for storage of off-road diesel for on-site use (Photos 18-31). The frac tanks sit in small plastic containment, designed to catch drips rather than 100% of the volume of the tank, over fly ash on soil surrounded by a low concrete berm. The tank levels listed in the chart below come from the 9/25/14 Daily Gauge Sheet provided by the facility (Appendix 4). The frac tanks are not labeled with the words "hazardous waste" or with the beginning date of accumulation. In addition, frac tank "B Tank" containing low flash distillate had an open hatch at the time of the inspection (Photo 18). I measured VOC emissions from the open hatch at 600 ppm using the Multi-Rae Pro 4 gas meter. Frac Tanks Water 1 and Water 2 also had open hatches. I observed black staining atop Frac Tank Water 2 indicating a potential overflow via the open hatch (Photo 19).

Frac Tanks

Frac Tank name	Photo#	Level per 9/25/14 Daily Gauge sheet (118" is full)	Contents per label	Facility Profile # and indication (Appendix 4)	Labeled as Hazardous waste	Date on container
Grey Split	22	88" front; 9" rear	Slop Oil; Slop Oil		No	None
Water 1	23	60"	Oily Water	Ecoserv; Class 1 Lone Star Ecology; Hazardous	No	None
Water 2	24	Rust	Oily Water	Ecoserv; Class 1 Lone Star Ecology; Hazardous	No	None
A-Tank	25	32"	Lube Oil		No	None
B-Tank	26	12"	Low Flash		No	None
C1 and C2	27	39"; 11"	Caustic; Benzene		No	None
D-Tank	28	15"	High Flash		No	None
E1 and E2	29	11"; 23"	6 oil; Oily water		No	None

At the time of the inspection, oily water was managed in 2 Frac Tanks labeled Water 1 and Water 2. Oil in the water may be hydrocarbon based - anything from crude oil to benzene - or agricultural in origin - like palm oil or soybean oil. Mr. Bowman stated that spent wash water containing oil is pumped to the frac tanks and allowed to settle. Ecowerks sends trucks in to pull the water layer from between the sludge (rust, dirt, solids) layer on the bottom and the floating oil/hydrocarbon layer (Photo 32). After multiple integrations of this process, either the solids or hydrocarbon layer gets large enough to be removed. The hydrocarbon layer, including non-petroleum oils, is sent to Value Resources on a BOL for "recovery" and the solids layer is moved to an open roll-off for treatment by solidification (evaporation and/or mixing of drying agent like fly ash) prior to disposal at Seabreeze Landfill in Angleton, Texas, or to the Newton County Landfill.

At least one instance "rust" was disposed as hazardous waste (D018) at US Ecology was noted. The facility has a waste profile for "dry rust" indicating that the material is a non-hazardous waste (Appendix 5). However, the facility does not have a hazardous waste determination for the waste "as generated" (the point of generation is upon removal from the barge not following treatment as the facility alleges). In addition, Mr. Bowman provided copies of e-mail between Seabreeze landfill and G. Bowman asking why the "rust" sent to their landfill and later rejected by the receiving facility had a low flashpoint Appendix 6. During the site tour I observed roll-off box # RB-1125035 (photo 5) which contained material that was being dried by evaporation (Mr. Durio stated that if rain appears likely the roll-off will be covered with a tarp). I measured VOC concentration at the roll-off at 2500 ppb (background was 600 ppb).

Rejected loads of wastewater shipped to Ecowerks

Most wastewater generated by the facility is shipped on "non-RCRA; non-DOT" manifests for treatment and disposal at Ecowerks in Port Arthur, Texas. I found records recording multiple loads of wastewater rejected by Ecowerks (Table 1 and Appendix 7). Mr. Bowman stated that when a load of wastewater sent to Ecowerks is rejected (typically due to flashpoint according to Mr. Bowman), that load is brought back to Gas Free. It is then placed in a frac tank, where it is allowed to settle. Following settling, hydrocarbon is removed from the upper portion of the frac tank for "recycling" by shipping to Value Resources. The remaining water is then shipped back to Ecowerks.

Randy Cooper stated that if water shipped to Ecowerks is rejected due to flash, it is later sent to Value Resources on a Bill of Lading for "hydrocarbon recovery" (a specific example of this is provided in the next paragraph). Value Resources is in Baytown, Texas and owned by G. Bowman. According to Mr. Bowman, Value Resources recovers hydrocarbons from wastewater by first allowing the waters to settle then heating them to enhance separation. I reviewed one year of manifests provided by the facility during the inspection (October 2013-October 2014). For the same period, I also included any loads listed as "rejected" in the Gas Free spreadsheet provided by the facility during the inspection (Appendix 7). The manifests (all stating non DOT/non RCRA or some variation of that) listed in the table below were all rejected by Ecowerks. Note: based on position in the folder provided by Mr. Bowman and on

the records in the Gas Free spreadsheet (Appendix 7), I believe the manifest dated 1/30/2013 was actually generated on 1/30/2014.

TABLE 1			
Date	Volume	Manifest #	Notes
8/1/2014	5000 gal	002333026GBF	
8/1/2014	5000 gal	002333027 GBF	
7/28/2014	5000 gal	002333020 GBF	solids
6/23/2014		002333869 GBF	
6/23/2014	5000 gal	002333876 GBF	high pH
6/30/2014	5000 gal	002333885 GBF	high pH
10/23/2014	5000 gal	002333869 GBF	
5/2/2014	5000 gal	002333814 GBF	
2/28/2014	5000 gal	002333729 GBF	
2/26/2014	5000 gal	002333728 GBF	
2/25/2014	5000 gal	002333719 GBF	
2/18/2014	5000 gal	002333712 GBF	
2/18/2014	5000 gal	002333710 GBF	
2/14/2014	5000 gal	002333704 GBF	
2/11/2014	5000 gal	002333701 GBF	Flash 65
1/30/2013	5000 gal	002333685 GBF	Flash 119
12/29/2013	4000 gal	002333641 GBF	
12/26/2013	5000 gal	002333637 GBF	
10/29/2013	5000 gal	002228675 GBF	gasoline on top
10/18/2013	5000 gal	PO GF13362	rejected for flash and COD
10/16/2013	5000 gal	002228689 GBF	transported to VR
10/11/2013	5000 gal	005794158JJK	

During the inspection, Mr. Bowman explained that wastewater shipped to Ecowerks on 10/29/13 via manifest 002228675GBF was rejected due to flash. Mr. Bowman stated that the waste water contained either soybean oil or hydrocarbon. A note on the facility's internal spreadsheet referring to manifest 002228675GBF (Appendix 8) indicates "gasoline on top". Following rejection by Ecowerks the wastewater was shipped to Value Resources for "hydrocarbon recovery" and disposal of the residual. The manifests and Bill of Lading (BOL) for shipments to Value Resources are included as Appendix 8.

Wastewater from Gas Free is a spent material, it has been used and as a result of contamination can no longer serve the purpose for which it was produced without processing. Wastewater sent off-site for disposal is a solid waste. Wastewater rejected by Ecowerks due to flashpoint below 140°F and shipped

off site for reclamation is a hazardous waste (D001) under the RCRA. Gas Free did not make an appropriate hazardous waste determination prior to sending the material off site for disposal. Once the hazardous characteristic was noted by the disposal facility, Gas Free did not ship the waste on an appropriately completed uniform hazardous waste manifest, or ensure the waste was shipped to an authorized facility, and did not ensure the transporter (Ecowerks) was a registered hazardous waste transporter. Manifest 002333637GBF represents one of 22 loads of wastewater that Ecowerks rejected in the year prior to the inspection (Table 1). The wastewater on Manifest 002333637GBF was later brought back to Gas Free for physical separation with the removed hydrocarbons shipped to Value Resources.

On-site potential "Treatment" of hazardous wastes

Triethylamine

Triethylamine (TEA) has a flash point of 17°F according to a MSDS on ScienceLab.com and is a listed hazardous waste. Commercial chemical product TEA like barge heels or barge heels plus wash water, when disposed should include both D001 and U404 hazardous waste codes. Mixing TEA into wash water for disposal is RCRA treatment by dilution, and prohibited under 40 CFR § 268.3. The facility did not have a waste analysis plan for conducting this treatment. I requested but never received all mixing "recipes" for material treated on-site and then shipped off-site. I also requested but never received "blend logs" of what has been blended in the past.

At Gas free, oily wastewater consists of oily water generated during barge cleanout, and other chemicals metered in at a pre-defined rate for disposal. For example: According to information given verbally during the inspection, the facility metered 500 gallons of TEA into wash water shipped to Ecowerks on Manifest 002333691GBF. Furthermore, documentation provided during the inspection indicates that the facility metered 75 gallons TEA into wash water sent to New Park Environmental (New Park) on Manifest 002333696 GBF, 500 gallons of TEA and DEA (listed as TEA in the Job section of the spreadsheet and "DEA" in the notes section of the spreadsheet) were metered into wastewater sent to New Park on Manifest 002333690 GBF, and "about 500 gallons" TEA was sent to New Park on Manifest 002333694 GBF (Appendix 9). All these waste streams were listed as "Non DOT; Non RCRA" on the manifest. The facility did not have a hazardous waste determination for wash water containing TEA or for waste TEA alone. Gas Free did include "amines" on the supplemental waste information page of the waste profile for Ecowerks (Appendix 10).

Treatment of naphthenic caustic in roll-off container

The facility conducted on-site treatment of Naphthenic Caustic (nap caustic) prior to disposal. Appendix 11 includes the lifecycle of nap caustic treatment and disposal. It includes laboratory analytical results of the nap caustic done prior to any treatment. The analysis shows the material would be hazardous

waste if disposed (D001 and D002) - flashpoint 115°F and pH 12.61 SU. The material was treated in a roll off by addition of "a solution containing sulfuric acid, glycol and water"; industrial bleach was added in an attempt to control the odor (Appendix 11). The water was separated to a separate tank using a filtration system. The water was sent to Texas Molecular as hazardous waste (D001). Fly ash was used to solidify the sludge (Appendix 11) then the waste was shipped as non-hazardous to SeaBreeze Landfill in Angleton, Texas as "Non RCRA, Non-haz Class 1 Oily Sludge, Rust W/Solids and Naphthenic Caustic". The facility shipped a total of 150 cubic yards of treated material between 11-27-13 and 12-3-13, manifests are included in Appendix 11. The treatment was conducted outside secondary containment (Photo 33).

Treatment of acrylic acid wastewater

According to Mr. Bowman, Gas Free treated acrylic acid wastewater at their location by neutralization using 12 drums of caustic received from Bluebonnet, in June 2012. The acrylic acid wastewater was generated by washing residual acrylic acid from a barge after the heel had been removed. Virgin acrylic acid when disposed is a listed hazardous waste (U008). Note: U008 is listed for ignitibility as denoted with an (I) in the listing. The treatment was conducted in rented poly tanks according to Mr. Bowman. The tanks would not meet the wastewater treatment unit exemption – they are not part of a wastewater treatment system or the elementary neutralization exemption (the exemption is limited to "corrosive only" wastes). In addition, Land Disposal Restrictions (LDRs) requires the treatment method "CMBST" – meaning thermal treatment is required for U008.

The treatment was unpermitted RCRA treatment and the resultant wastewater should have carried the listing and been disposed at an authorized hazardous waste disposal facility. The resultant wastewater was sent to New Park for disposal. Gas Free could not produce the manifest (stating that pre-2013 records were lost in a computer crash), but did provide a spreadsheet showing the manifest numbers and date shipped (Appendix 12). The waste was disposed under Waste Code 0082051 which according to the NOR (Appendix 16) is a non-hazardous barge wash containing oil. I called New Park on April 14, 2015 and asked if they would send copies of the two manifests. The manifests were received on April 15, 2015 (Appendix 16). According to Mr. Boyd, Gas Free has conducted this activity 3 times since 2012, however, I was later told that acrylic acid was treated once and "another" acid was treated once in this manner.

RW Anderson

Mr. Anderson is an off-site consultant who stated that he helps manage Gas Free inventory by providing mixing specifications describing what chemicals can be mixed with low flashpoint distillates prior to shipping them off-site for further fuel blending (Appendix 13). Mr. Anderson stated that up to 10% of a load of petroleum distillate can be "oxygenates" like Methyl Ethyl Ketone (MEK). For example: on

September 24, 2012, RW Anderson shipped a mixed load containing: high flash distillate from Gas Free Tank D, low flash distillate from Gas Free Tank B, 1000 gallons of crude oil and 500 gallons of MEK to Intergulf in LaPorte, Texas (see Record of Material Loading in Appendix 14). The material was shipped on BOL 501109 via trailer 7041. Mr. Anderson stated that the MEK was virgin and qualified to go into fuel (Appendix 14). The BOL lists Petroleum Distillate, n.o.s. (naphtha, alkylate). There is no mention on the BOL of the crude or the MEK. The transporter was Intergulf (TXR000076604). Virgin MEK is a hazardous waste (U159) when burned for energy recovery.

I explained to Mr. Anderson that fuels can be mixed with other fuels and remain a non-solid waste fuel. However, if a fuel is mixed with a non-fuel chemical and that mixture is burned for energy recovery – that would be considered "disposal" of a hazardous waste.

Facility representatives made several mentions of other activities that could be considered RCRA "treatment" I was able to locate few if any records to support the information given to me. Below is a summary of some of activities described that would meet the definition of RCRA treatment:

- Treating wastewater onsite by iterative removal of "water" layer from between hydrocarbon or other floating oil and solid layer.
- Greg Bowman stated that soybean sludge is normally sent off site to Seabreeze Landfill. If the sludge flashes hazardous it is treated on-site by solidification. (Any and all flash testing is done by Mr. Bowman at his Baytown Location).

The facility is registered as a large quantity generator under the RCRA (Appendix 15). The facility's Notice of Registration (NOR),updated following the inspection, is included as Attachment 16.

Record Review conducted by Adolphus Talton.

- Contingency Plan is non-compliant with 265.52 (None of the requirements were kept):
  It does not describe the arrangements agreed with local police departments, fire departments, hospitals, State and local emergency response team;
  It does not identify all the names, addresses, and phone numbers of all persons qualified to act as emergency coordinator nor is it kept updated;
  It does not list all emergency equipment at facility nor is it kept updated; and
  No records on file that indicate a copy was submitted to local authorities (i.e. Police Dept., Fire Dept. etc.).

- SPCC is outdated. It does not identify key personnel.

- Training Program is inadequate and non-compliant with 265.16:
  Hazardous Training is inadequate: Only 8 out of 53 personnel has completed 40 hour HAZWOPER training. Safety meeting used as training (i.e. Hazardous Waste handling, MSDS, emergency procedure, PPE, etc.). No Annual 8 hour HAZWOPER refresher training administered;

Attendees not signing the sign-in sheet.

- Preparedness and Prevention Training (265 Subpart C):
  Training is inadequate: Attendees not signing the sign-in sheet.

Section III – AREAS OF CONCERN

1 40 CFR 270.1 – Permit Required Treatment

- Treatment of potentially hazardous waste solids (rust, heels and sludge) by evaporation and solidification
- Treatment of potentially hazardous waste oily wash water by iteratively removing the "water" layer for disposal and accumulating the hydrocarbon and solid layer for later treatment or "reclamation".
- Treatment of triethylamine (TEA) (D001, U404) by metering it into wastewater sent off site as non-hazardous waste.
- Treatment of naphthenic caustic (D001 and D002) by on-site neutralization, separation and solidification of solids.
- Treatment of acrylic acid wastewater (U008) by neutralization followed by shipment off site as a non-hazardous waste.
- Treatment of Methyl Ethyl Ketone (MEK) by fuel blending with petroleum distillates prior to shipment off-site for further fuel blending.

The facility did not have a waste analysis plan describing treatment methods and sampling strategies for any of these wastes as required by 268.7 (a)(5).

2 40 CFR 262.34 (a)(1)(ii) – Accumulation of hazardous waste in tanks.

During the inspection, I noted that the generator stored and/or treated hazardous waste in tanks without adequate secondary containment.

- Frac tanks Water 1 and Water 2 containing oil bearing "wash water" which is periodically a RCRA hazardous waste (D001) do not have secondary containment capable of containing 100% of the volume of the largest tank in that containment.
- Roll-off RB-1125035 used to treat potentially hazardous solids removed from barges via evaporation and solidification do not have secondary containment capable of containing 100% of the volume of the largest tank in that containment.

3 40 CFR 262.11 - Hazardous Waste Determination

During the inspection, I noted that the facility failed to complete hazardous waste determinations on many wastes at the point of generation and again following treatment. Some of the wastes for which hazardous waste determinations were inadequate include:

- Spent washwater from barge cleaning.
- Spent washwater from barge cleaning following treatment by iterative water layer removal.
- Spent washwater from barge cleaning following rejection by disposal facility
- Spent washwater from barge cleaning containing heels from barge cleaning.
- Sludges removed from treated spent washwater.
- Rust and solids removed from spent washwater.
- Floating oils removed from treated spent washwater.
- Non-fuel component heel removed from barges and blended with fuels.
- Heel removed from barges and diluted into spent washwater.
- Solid residue derived from treating listed hazardous waste barge heel.
- Liquid residue derived from treating listed hazardous waste barge heel.
- Acrylic acid washwater prior to treatment.
- Acrylic acid washwater following treatment.

I requested that the facility conduct appropriate hazardous waste determinations for all wastes generated.

4 40 CFR 262.20 (a)(1) – Manifesting (proper completion of manifest)

During the inspection, I noted that the facility failed to ensure that hazardous wastes were shipped on appropriately completed manifests. Between October 2013 and October 2014, the facility had 18 loads of wastewater rejected due to low flashpoint. Those 18 loads were initially shipped on manifests with the waste described as “non-DOT/non-RCRA” and were either shipped back to TC for treatment or shipped to Value Resources for treatment using a bill of lading or a manifest with the waste described as “non-DOT/non-RCRA”.

5 40 CFR 262.20 (a)(1) – Manifesting (designated facility)

During the inspection, I noted that hazardous waste as described below was shipped to a facility which was not authorized to handle hazardous waste. Examples of hazardous wastes shipped to unpermitted facilities:

- Wastewater previously rejected from other facilities then shipped to Value Resources
- Treated residual from listed hazardous waste shipped to Seabreeze landfill.
- Non-fuel heels (MEK; U159) blended with oils and shipped to Intergulf Corporation.
- Wastewater containing diluted listed heels shipped to Ecowerks.
- Liquid waste derived from treating listed hazardous waste and shipped to New Park Environmental Services in Winnie, Texas.

6 40 CFR 263.11 – Transporter Requirements

During the inspection, I noted that hazardous wastes were shipped using transporters that were not registered as RCRA transporters. The facility shipped spent wastewater that was later determined to exhibit a low flashpoint on manifest 002228675 GBF using Ecowerks as a transporter. Following the determination of the low flashpoint, Ecowerks transported the same waste to Value Resources on a bill of lading. Ecowerks is not registered as a hazardous waste transporter. In addition, the facility shipped triethylamine (TEA) diluted into wash water to Ecowerks with no transporter listed on Manifest 002333691GBF. The facility shipped waste trichloroethylene (D040) using Manifest 002332782 GBF using Bluebonnet Petrochemical Services as Transporter 1.

7 40 CFR 262.40 – Recordkeeping

During the inspection, I noted that Gas Free keeps environmental records electronically. Mr. Durio stated that the computer where the records were kept failed in 2012. Records were only available for review for 2 years prior to the inspection.

8 Section 3007 (a) of the Resource Conservation and Recovery Act

During the inspection, the EPA inspection team was asked to leave the facility while facility representatives met to discuss officially denying the team's access to hazardous waste management records. After approximately 40 minutes, the inspectors were invited to continue the inspection.

9 40 CFR 262.42 – Manifesting (Exception Reporting)

The facility shipped waste trichloroethylene (D040) using Manifest 002332782 GBF. The manifest retained by the facility is not signed by the designated facility. The facility shipped the hazardous waste more than 45 days prior to the inspection and the facility did not provide an exception report for the missing signature.

10 40 CFR 270.1 – Permit Required Storage
During the inspection I observed partially polymerized styrene that had been stored for over 90 days in the tote storage area. In addition, the container was not labeled with the words "hazardous waste".

11 40 CFR 262.34 (a)(3) – Container Storage Requirements
I noted that the facility accumulated two totes of waste trichloroethylene wash water (D040; U228) and one tote of waste styrene (D001) from washing barge heels. The totes were not labeled with the words "hazardous waste". In addition, the facility accumulated a mixture of spent oil bearing wash waters that periodically exhibits the characteristic of ignitability (D001) in

frac tanks Water 1 and Water 2. The frac tanks were not labeled with the words "hazardous waste".

12 40 CFR 262.34 (a)(1)(i) – Container Storage Requirements

I noted that the facility accumulated hazardous waste styrene wash water (D001) in a tote that was not closed. In addition, the facility accumulated a mixture of spent oil bearing wash waters that periodically exhibits the characteristic of ignitability (D001) in frac tanks Water 1 and Water 2. The frac tanks were equipped with ullage hatches that were not closed during the inspection.

13 40 CFR 268.40(a)(3) – Treatment Standards

I noted that waste acrylic acid (U008) was treated by neutralization rather than the LDR required treatment (CMBST).

14 40 CFR 262.34(a)(4) – Preparedness, Prevention and Personnel Training

The facility did not have adequate personnel training or an adequate contingency plan.

Section IV – LIST OF APPENDICES

1 Photo Log
2 Records of chlorinated solvent disposal
3 Waste profile for trichloroethylene wash water
4 Daily gauge sheet
5 Waste profile for "dry rust"
6 E-mail from Seabreeze landfill to G. Bowman regarding "rust" with a low flashpoint
7 Example rejected manifests
8 "lifecycle" example of a rejected load from Ecowerks to Value Resources
9 Triethylamine (U404) metered into spent wash water sent to Ecowerks for disposal
10 Wastewater profile provided to Ecowerks
11 "lifecycle" example of nap caustic treatment
12 Acrylic acid treatment
13 RW Anderson e-mail dictating mixing ratios for petroleum distillates and non-fuel wastes
14 Record of material loading for crude oil mixed with MEK
15 Annual Waste Summary from 2011-2013
16 TCEQ Notice of Registration

APPENDIX 1

Photographs

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Overview Map

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	P9300001.JPG
Title	Tubal-Cain Gas Free
Subject	Overview of facility - the white frac tanks contain crude oil and rust
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 9:42:23 AM
Port Arthur, Texas	State ID - 90733

P9300001.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300002.JPG
Title	Tubal-Cain Gas Free
Subject	Overview of facility
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 9:42:31 AM
Port Arthur, Texas	State ID - 90733

P9300002.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300003.JPG
Title	Tubal-Cain Gas Free
Subject	Overview of facility
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 9:42:48 AM
Port Arthur, Texas	State ID - 90733

P9300003.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	P9300004.JPG
Title	Tubal-Cain Gas Free
Subject	Drum labeled "crude" opened by facility at my request for photo.
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 9:57:50 AM
Port Arthur, Texas	State ID - 90733

P9300004.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300005.JPG
Title	Tubal-Cain Gas Free
Subject	Rust and liquid in roll-off RB-1125035
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:07:02 AM
Port Arthur, Texas	State ID - 90733

P9300005.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300006.JPG
Title	Tubal-Cain Gas Free
Subject	Styrene heel from barge K10334 - appears partially polymerized
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:15:52 AM
Port Arthur, Texas	State ID - 90733

P9300006.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	P9300007.JPG
Title	Tubal-Cain Gas Free
Subject	Slop oil - from slop oil tank on tug boat - approximately 80% full
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:18:30 AM
Port Arthur, Texas	State ID - 90733

P9300007.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300008.JPG
Title	Tubal-Cain Gas Free
Subject	350 gallon tote of caustic. No barge #.
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:20:15 AM
Port Arthur, Texas	State ID - 90733

P9300008.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300009.JPG
Title	Tubal-Cain Gas Free
Subject	250 gallon tote caustic
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:22:42 AM
Port Arthur, Texas	State ID - 90733

P9300009.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	P9300010.JPG
Title	Tubal-Cain Gas Free
Subject	Nearly empty sulfuric acid tote. Dated 3-27-14. This material is used to "neutralize" waste in frac tanks.
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:24:49 AM
Port Arthur, Texas	State ID - 90733

P9300010.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300011.JPG
Title	Tubal-Cain Gas Free
Subject	Styrene wash water tote - dated 7-28-14
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:26:49 AM
Port Arthur, Texas	State ID - 90733

P9300011.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300012.JPG
Title	Tubal-Cain Gas Free
Subject	55-gallon drum - no lid closed with trash bag. Labeled hexmethylenediamine - from barge 89.
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:29:06 AM
Port Arthur, Texas	State ID - 90733

P9300012.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	P9300013.JPG
Title	Tubal-Cain Gas Free
Subject	Tote labeled methyl methacrylate - dated 8-16-14
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:30:46 AM
Port Arthur, Texas	State ID - 90733

P9300013.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300014.JPG
Title	Tubal-Cain Gas Free
Subject	Tote labeled methyl ethyl ketone from barge Kirby 10557 - dated 9-6-14
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:33:17 AM
Port Arthur, Texas	State ID - 90733

P9300014.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300015.JPG
Title	Tubal-Cain Gas Free
Subject	Tote labeled trichloroethylene wash water from Barge NM1017 - dated 9-11-14
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:35:05 AM
Port Arthur, Texas	State ID - 90733

P9300015.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	P9300016.JPG
Title	Tubal-Cain Gas Free
Subject	Tote labeled Trichloroethylene wash water from Barge NM1017 - dated 9-11-14
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:35:51 AM
Port Arthur, Texas	State ID - 90733

P9300016.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300017.JPG
Title	Tubal-Cain Gas Free
Subject	No label on tote. Thomas Tull stated that the tote contained trichloroethylene wash water from Barge NM1017
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:36:31 AM
Port Arthur, Texas	State ID - 90733

P9300017.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300018.JPG
Title	Tubal-Cain Gas Free
Subject	Open ullage hatch on low flash distillate frac tank. I measured 600 ppm VOC at the open hatch using MultiRae PID
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:49:04 AM
Port Arthur, Texas	State ID - 90733

P9300018.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	P9300019.JPG
Title	Tubal-Cain Gas Free
Subject	Lube oil and wash water frac tanks north of low flash distillate frac tank. All hatches are open.
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:52:03 AM
Port Arthur, Texas	State ID - 90733

P9300019.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	P9300020.JPG
Title	Tubal-Cain Gas Free
Subject	Caustic, benzene, high flash distillate, and fuel oil in frac tanks south of the low flash distillate frac tank.
Photographer - David Robertson	TXR000080426
Date Time Stamp	9/30/2014 10:54:12 AM
Port Arthur, Texas	State ID - 90733

P9300020.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010021.JPG
Title	Tubal-Cain Gas Free
Subject	Frac tanks looking from north toward south
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:36:05 AM
Port Arthur, Texas	State ID - 90733

PA010021.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	PA010022.JPG
Title	Tubal-Cain Gas Free
Subject	Frac tank containing wash water according to Mr. Boyd
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:38:27 AM
Port Arthur, Texas	State ID - 90733

PA010022.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010023.JPG
Title	Tubal-Cain Gas Free
Subject	Frac tank containing wash water according to Mr. Boyd
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:38:34 AM
Port Arthur, Texas	State ID - 90733

PA010023.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010024.JPG
Title	Tubal-Cain Gas Free
Subject	Frac tank containing wash water according to Mr. Boyd
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:38:47 AM
Port Arthur, Texas	State ID - 90733

PA010024.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	PA010025.JPG
Title	Tubal-Cain Gas Free
Subject	Frac tank containing lube oil according to Mr. Boyd
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:39:21 AM
Port Arthur, Texas	State ID - 90733

PA010025.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010026.JPG
Title	Tubal-Cain Gas Free
Subject	Frac tank containing low flash distillate according to Mr. Boyd
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:39:27 AM
Port Arthur, Texas	State ID - 90733

PA010026.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010027.JPG
Title	Tubal-Cain Gas Free
Subject	Split frac tank containing caustic wash water in one tank and benzene in the other according to Mr. Boyd
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:39:33 AM
Port Arthur, Texas	State ID - 90733

PA010027.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	PA010028.JPG
Title	Tubal-Cain Gas Free
Subject	Frac tank containing high flash distillate according to Mr. Boyd
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:39:40 AM
Port Arthur, Texas	State ID - 90733

PA010028.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010029.JPG
Title	Tubal-Cain Gas Free
Subject	Split frac tank containing six oil fuel oil in one side and with the second tank empty according to Mr. Boyd
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:39:46 AM
Port Arthur, Texas	State ID - 90733

PA010029.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010030.JPG
Title	Tubal-Cain Gas Free
Subject	Tote storage area as described in Photos 6-17 and 74-79
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:39:54 AM
Port Arthur, Texas	State ID - 90733

PA010030.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	PA010031.JPG
Title	Tubal-Cain Gas Free
Subject	Frac tank containing red diesel for use on-site
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:40:01 AM
Port Arthur, Texas	State ID - 90733

PA010031.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010032.JPG
Title	Tubal-Cain Gas Free
Subject	EcoWerks truck loading wash water from Frac Tank W2.
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:42:33 AM
Port Arthur, Texas	State ID - 90733

PA010032.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA010033.JPG
Title	Tubal-Cain Gas Free
Subject	General area where napthenic caustic treatment was conducted in 2012. (note photos 34-73 show Tubal-Cain Marine Services and can be seen in that report).
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/1/2014 11:45:59 AM
Port Arthur, Texas	State ID - 90733

PA010033.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	PA020074.JPG
Title	Tubal-Cain Gas Free
Subject	Vinyl acetate heel tote 80% full
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/2/2014 11:12:25 AM
Port Arthur, Texas	State ID - 90733

PA020074.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA020075.JPG
Title	Tubal-Cain Gas Free
Subject	Vinyl acetate heel tote 50% full
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/2/2014 11:12:33 AM
Port Arthur, Texas	State ID - 90733

PA020075.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA020076.JPG
Title	Tubal-Cain Gas Free
Subject	Vinyl acetate wash water
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/2/2014 11:13:29 AM
Port Arthur, Texas	State ID - 90733

PA020076.JPG

Title: Tubal-Cain Gas Free

Tubal-Cain Gas Free Services

TXR000080426

Port Arthur, Texas

Attributes	
File Name	PA020077.JPG
Title	Tubal-Cain Gas Free
Subject	Vinyl acetate wash water
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/2/2014 11:13:50 AM
Port Arthur, Texas	State ID - 90733

PA020077.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA020078.JPG
Title	Tubal-Cain Gas Free
Subject	Vinyl acetate wash water
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/2/2014 11:14:06 AM
Port Arthur, Texas	State ID - 90733

PA020078.JPG

Title: Tubal-Cain Gas Free

Attributes	
File Name	PA020079.JPG
Title	Tubal-Cain Gas Free
Subject	Vinyl acetate wash water
Photographer - David Robertson	TXR000080426
Date Time Stamp	10/2/2014 11:14:15 AM
Port Arthur, Texas	State ID - 90733

PA020079.JPG

Title: Tubal-Cain Gas Free

APPENDIX 2

Records of Chlorinated Solvent Disposal (9 pages)

Tubal Cain Gas Free Services
Port Arthur, Texas

TCGF 8 (9/11)

TXR000080426

Invoice

GB Sales & Consulting
14303 Hartshill Dr
Houston, TX 77044
PH 713-419-6076 / FX 832-553-2897
E-mail gallenb1963@gmail.com

Date	Invoice #
9/17/2014	13055

Bill To

Tubal-Cain Marine Services
8737 Old Yacht Club Rd
Port Arthur, TX 77642
PH: 409-962-8806

P.O. No.	Terms	Project
GF14966	Net 30	

Quantity	Description	Rate	Amount
2	8/14 - TCE totes, 002332782gbf	2,950.00	5,900.00
1	8/14 - Freight	850.00	850.00

Thank you for your business.

Payments/Credits $0.00

Total $6,750.00

Balance Due $6,750.00

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter).

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: TXR000080426
2. Page 1 of 1
3. Emergency Response Phone: 409-762-8800
4. Manifest Tracking Number: 002332782 GBF

5. Generator's Name and Mailing Address: Tubal Cain Gas Free, 8757 Old Yacht Club Rd, Port Arthur TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-762-8800

6. Transporter 1 Company Name: Bluebonnet Petrochemical Solutions LLC
U.S. EPA ID Number: TXR000081178

7. Transporter 2 Company Name: THUNDERBIRD TRUCKING, LLC
U.S. EPA ID Number: INR000123497

8. Designated Facility Name and Site Address: Tradebe Treatment & Recycling of TN, 5485 Victory Lane, Millington, TN 38053
U.S. EPA ID Number: ~~INR000123497~~ TND000772186

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
Y	1. UN1710, Waste Trichloroethylene, 9, Class 6.1, PG III	2	TP	325	P	D040
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1. WST GBSC-026-14, TCE
737213

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Thomas Thiel
Signature:
Month 08 Day 14 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Francis Villalta
Signature: Francis Villalta
Month 08 Day 14 Year 14

Transporter 2 Printed/Typed Name: James Little
Signature:
Month 8 Day 14 Year 14

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

TRANSPORTER'S COPY

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Invoice

GB Sales & Consulting
14303 Hartshill Dr
Houston, TX 77044
PH 713-419-6076 / FX 832-553-2897
E-mail gallenb1963@gmail.com

Date	Invoice #
9/17/2014	13044

Bill To

Tubal-Cain Marine Services
8737 Old Yacht Club Rd
Port Arthur, TX 77642
PH: 409-962-8806

P.O. No.	Terms	Project
GF14965	Net 30	

Quantity	Description	Rate	Amount
1,500	8/14 - Management of TCE wash water, 002333054gbf	1.15	1,725.00
1	8/14 - Freight	850.00	850.00

Thank you for your business.

Payments/Credits $0.00

Total $2,575.00

Balance Due $2,575.00

Tubal Cain Gas Free Services
Port Arthur, Texas

TR1#VT125 Job# 4231

TXR000080426

Actual Qty 6700 lbs 795 gal

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: TXR000080426
2. Page 1 of 1
3. Emergency Response Phone: 409-962-8300
4. Manifest Tracking Number: 002333054 GBF

5. Generator's Name and Mailing Address: Tubal Cain Marine, 8337 Old Yacht Club Rd, Port Arthur TX 77642
Generator's Site Address (if different than mailing address):
Generator's Phone:

6. Transporter 1 Company Name: TCB 281-824-7927
U.S. EPA ID Number: TXR000080426

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Texas Molecular, 2525 Independence Pkwy, Deer Park TX 77536
U.S. EPA ID Number: TXD007119518
Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. UN 1710, Hazardous waste liquid NOS, (Trichloroethylene), 6.1, PG III	01	TT	1500	G	D000 F020 H H D040
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Waste # 11140513

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: K. Thomas Thul
Signature:
Month 6 Day 14 Year 14

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: K. Travis Crow
Signature:
Month 8 Day 14 Year 14
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space: ☒ Quantity ☒ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
>10% weight discrepancy, Actual 6,700 lbs. Missing TMDP placard in box 5. Missing generator phone # in box 5. Manifest Reference Number: (L. Brown) 281-930-2525 Missing TMDP placard in box 9. Hazardous waste liquid, N.O.S. (Tri chloroethylene) BOL should read NA3082, Hazardous waste liquid, N.O.S. (Tri chloroethylene) Cat. 1, PG III
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H134 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: William Carpenter
Signature:
Month 8 Day 14 Year 14

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Tubal Cain Gas Free Services
Port Arthur, Texas

Form Approved. OMB ...

GBF

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: TXR000080426
2. Page 1 of 1
3. Emergency Response Phone: 409-962-8800
4. Manifest Tracking Number: 002332782 TXR000080426

5. Generator's Name and Mailing Address: Tubal Cain Gas Free, 8737 old Yacht Club Rd, Port Arthur, TX 77642
Generator's Phone: 409-962-8800
Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Bluebonnet Chemical Solutions LLC — U.S. EPA ID Number: TXR000081678
7. Transporter 2 Company Name: THUNDERBIRD TRUCKING, LLC — U.S. EPA ID Number: INR000123497
8. Designated Facility Name and Site Address: Tradebe Treatment & Recycling of TN, 5485 Victory Lane, Millington, TN 38053 — U.S. EPA ID Number: ~~DKR000023977~~ TND000772186
Facility's Phone: Millington, TN 38053

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
Y	1. UN1710, Waste Trichloroethylene, Class 6.1, PG III	2	TP	325 / 300	G / LB	D040
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1. LDR# CBSC-07E-14, TCE 737213

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packa marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Prim Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.
Generator's/Offeror's Printed/Typed Name: Thomas Thul — Signature: Thomas Thul — Month 08 Day 1

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only): Signature: Month 08

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Francis Villalta — Signature: Francis Villalta — Month 8
Transporter 2 Printed/Typed Name: JAMES LITTLE — Signature: [illegible]

18. Discrepancy ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ F
18a. Discrepancy Indication Space — Manifest Reference Number: — U.S. EPA ID Number
Accepted for Greg Rainer
18b. Alternate Facility (or Generator) — Month
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a — Mo
Printed/Typed Name: [illegible] — Signature: [illegible]

GENERATOR → TRANSPORTER INT'L → DESIGNATED FACILITY

DESIGNATED FACILITY

Form 8700-22 (Rev.3-05) Previous editions are obsolete.

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number	22. Page	23. Manifest Tracking Number
TXR000080426	2 of 2	002332782 GBF

24. Generator's Name: Tubal Cain, Gassfree

25. Transporter 3 Company Name: Thunderbird Trucking LLC — U.S. EPA ID Number: TXR000123497

26. Transporter ____ Company Name: — U.S. EPA ID Number:

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
	For Transportation Only							

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name: Tom Lacombe — Signature: [signature] — Month: 8 Day: 20 Year: 14

34. Transporter ____ Acknowledgment of Receipt of Materials
Printed/Typed Name: — Signature: — Month: Day: Year:

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Tubal Cain Gas Free Services
Port Arthur, Texas

Actual Qty 6700 lb 795 gal
TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: TXR000080426
2. Page 1 of: 1
3. Emergency Response Phone: 409-962-8800
4. Manifest Tracking Number: 002333054 GBF

5. Generator's Name and Mailing Address: Tubal Cain Marine, 8754 Old Yacht Club Rd, Port Arthur TX 77642
Generator's Site Address (if different than mailing address):
Generator's Phone:

6. Transporter 1 Company Name: TCB 281-864-7927
U.S. EPA ID Number: TXR000080496

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Texas Molecular, 2629 Independence Pkwy, Deer Park TX 77536
U.S. EPA ID Number: TXD007119518
Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. UN 2810, Hazardous waste liquid N.O.S. (Trichlorethylene), 6.1, PG III	01	TT	1500	G	D040	D039	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
Waste Stream
1114 0513

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Thomas Thul — Signature: — Month 8 Day 14 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: — Signature: — Month 8 Day 14 Year 14
Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☒ Quantity ☒ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
>10% weight discrepancy. Actual 6,700 lbs. Missing TMDP phone # in box 5. Missing generator phone # in box 8. Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H134 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: William Carpenter — Signature: — Month 8 Day 14 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

TM Deer Park Services Limited Partnership
WASTE PROFILE

TMDP Profile/WS#:

P.O. Box 1914 • 2525 Independence Parkway South • Deer Park, TX 77536-1914 • Phone: 281/930-2525 • Fax: 281/930-2535

I. CUSTOMER/GENERATOR INFORMATION:

Customer Name: GB Sales and Consulting
Billing Address: 14303 Hartshill Drive
Houston, TX 77044
Contact: Greg Bowman
Phone: 713-419-6076
Fax:
E-MAIL: gallenb1963@gmail.com

Generator Name: Tubal-Cain Marine Services
Physical Address: 8737 Old Yacht Club Road
Port Arthur, TX 77642
Mailing Address:
24-Hour Contact: Cade Durio
24-Hour Phone: 409-960-9273

II. WASTE GENERATION DATA:

Waste Name: Perc Water

Describe the process that generates this waste: Product is stripped from barge before wash/rinse. Once all product is removed, barge is washed and rinsed. The wash/rinse water is then removed and placed into totes for disposal.

Annual Volume: ____ ☐ lbs ☐ tons ☐ gals ☐ drums Container Size/Type: 275 Shipping Frequency: 1 per qtr

EPA ID No. TXR000080426 State ID No. 90733 State Waste Code 05062-04H SIC# ___

III. RCRA DATA:

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

EPA Hazardous Waste Codes: D039

IV. WASTE PROPERTIES:

(A) pH Range: 6 to 8
(B) Specific Gravity: 1.0 to 1.2
(C) Appearance (e.g. yellow, clear, turbid, etc.): Clear to off white
(D) Physical State: ☐ Solid ☒ Liquid ☐ Semi-Solid
(E) Odor: ☐ Strong ☒ Mild ☐ None
(F) Describe Odor (acrid, rancid, etc.):
(G) Flash Point: ____ ☐ °F ☐ °C ☐ Closed Cup ☐ Open Cup
(H) Vapor Pressure: ____ (PSI)
(I) Settled Solids (by vol.): ____ to ____ %
(J) Insoluble Constituents (by vol.): ____ to ____ %
(K) Dry Weight Factor:

Mark if any of the following pertain to this waste:

☐ Pyrophoric	☐ Pesticides	☐ PCBs > 50 ppm
☐ Hydrophobic	☐ Dioxins	☐ Universal
☐ Biological	☒ Carcinogens	☐ Lab Pack
☐ Explosives	☐ Sulfides	☐ NESHAP-Regulated
☐ Radioactive	☒ Organics	(Part____, Subpart____)

Does the waste liberate any gases above PEL into the headspace?

	Yes	No	AMOUNT
Hydrogen Cyanide	☐	☒	
Hydrogen Sulfide	☐	☒	
Sulfur Dioxide	☐	☒	
Other Toxic Gas	☐	☒	

Specify:

V. SHIPPING INFORMATION:

DOT Shipping Name: UN 1897 Waste water with tetrachloroethylene
DOT Hazard Class: 6.1 UN/NA Number: 1897 Packing Group: III Reportable Qty. (Lbs):
Required personnel protective equipment & procedures:

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

VI. COMPONENTS: Account for 100% of the waste components. Include metals, UHCs, TRI-reportable chemicals, etc.

CAS # (Optional)	Constituent	Range	Unit	CAS # (Optional)	Constituent	Range	Unit
127-18-4	Tetrachloroethylene	0-	78 ppm				

Specific constituents of concern: [X] Check here if the following constituents do not apply to the waste described in this document.

79-06-1	Acrylamide	N/A		7446-27-7	Lead phosphate	N/A	
309-00-02	Aldrin	N/A		628-86-4	Mercury fulminate	N/A	
20859-73-8	Aluminum phosphide	N/A		56-49-5	3-Methylcholanthrene	N/A	
7778-39-4	Arsenic acid	N/A		79-46-9	2-Nitropropane	N/A	
1303-28-2	Arsenic pentoxide	N/A		924-16-3	N-Nitrosodi-n-butylamine	N/A	
1327-53-3	Arsenic trioxide	N/A		1116-54-7	N-Nitrosodiethanolamine	N/A	
92-87-5	Benzidine	N/A		55-18-5	N-Nitrosodiethylamine	N/A	
98-07-7	Benzotrichloride	N/A		62-75-9	N-Nitrosodimethylamine	N/A	
319984-6	alpha-BHC	N/A		10595-95-6	N-Nitrosomethylethylamine	N/A	
319-85-7	beta-BHC	N/A		684-93-5	N-Nitroso-N-methylurea	N/A	
107-30-2	Chloromethylmethyl ether	N/A		930-55-2	N-Nitrosopyrrolidine	N/A	
111-44-4	sym-Dichloroethyl ether	N/A		7803-51-2	Phosphine	N/A	
542-88-1	sym-Dichloromethyl ether	N/A		50-55-2	Reserpine	N/A	
60-57-1	Dieldrin	N/A		1314-80-3	Sulphur phosphide	N/A	
56-53-1	Diethylstilbesterol	N/A		78-00-2	Tetraethyl lead	N/A	
122-66-7	1,2-Diphenylhydrazine	N/A		1314-32-5	Thallic oxide	N/A	
621-64-7	Di-n-propylnitrosamine	N/A		6533-73-9	Thallium carbonate	N/A	
	Dioxins	N/A		7791-12-0	Thallium chloride	N/A	
298-04-4	Disulfoton	N/A		10102-45-1	Thallium nitrate	N/A	
115-29-7	Endosulfan	N/A		12039-52-0	Thallium selenite	N/A	
33213-6-5	Endosulfan II	N/A		7446-18-6	Thallium sulfate	N/A	
	Endrin metabolites	N/A		62-56-6	Thiourea	N/A	
106-93-4	Ethylene dibromide	N/A		137-26-8	Thiram	N/A	
76-44-8	Heptachlor	N/A		99-35-4	1,3,5-Trinitrobenzene	N/A	
302-01-2	Hydrazine	N/A		1314-84-7	Zinc phosphide	N/A	
7439-92-1	Lead	N/A					

Waste characterization determined by: [X] Process Knowledge [X] Waste Analysis (Provide copy) [X] MSDS/SDS(s) (Provide copy)

VII. Certification

I hereby certify and warrant that the information supplied on this form, and any attachments, represents a complete and accurate identification and description of this waste material, its constituents and its known or suspected hazards. I further certify and warrant that this information is the result of an analysis of a representative sample of the waste obtained and analyzed in accordance with testing procedures of the U.S. Environmental Protection Agency or by the application of knowledge of the process generating the waste materials per EPA Guidelines.

PRINTED NAME: _____ SIGNATURE: _____ DATE: _____

APPENDIX 3

Trichloroethylene Wash Water Profile (5 pages)

TM Deer Park Services Limited Partnership
WASTE PROFILE

TMDP Profile/WS# : 11140513

P.O. Box 1914 • 2525 Independence Parkway South • Deer Park, TX 77536-1914 • Phone: 281/930-2525 • Fax: 281/930-2535

I. CUSTOMER/GENERATOR INFORMATION:

Customer Name: GB Sales and Consulting
Billing Address: 14303 Hartshill Drive
Houston, TX 77044
Contact: Greg Bowman
Phone: 713-419-6076
Fax:
E-MAIL: gallenb1963@gmail.com

Generator Name: Tubal-Cain Marine Services
Physical Address: 8737 Old Yacht Club Road
Port Arthur, TX 77642
Mailing Address:
24-Hour Contact: Cade Durio
24-Hour Phone: 409-960-9273

II. WASTE GENERATION DATA:

Waste Name: Trichloroethylene

Describe the process that generates this waste: Product is stripped from barge before wash/rinse. Once all product is removed, barge is washed and rinsed. The wash/rinse water is then removed and placed in totes for disposal.

Annual Volume: ____ ☐ lbs ☐ tons ☒ gals ☐ drums Container Size/Type: 275 Shipping Frequency: 1 per qtr

EPA ID No. T X R 0 0 0 0 8 0 4 2 6 State ID No. 9 0 7 3 3 State Waste Code 0 0 0 6 2 0 4 H SIC# ____

III. RCRA DATA:

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

EPA Hazardous: D040

Waste Codes:

IV. WASTE PROPERTIES:

(A) pH Range: 6 to 8
(B) Specific Gravity: .97 to 1.2
(C) Appearance (e.g. yellow, clear, turbid, etc.): clear to off white
(D) Physical State: ☐ Solid ☒ Liquid ☐ Semi-Solid
(E) Odor: ☐ Strong ☒ Mild ☐ None
(F) Describe Odor (acrid, rancid, etc.): none to mild
(G) Flash Point: >140 ☒ °F ☐ °C ☐ Closed Cup ☐ Open Cup
(H) Vapor Pressure: 0 (PSI)
(I) Settled Solids (by vol.): 0 to .25 %
(J) Insoluble Constituents (by vol.): 0 to 0 %
(K) Dry Weight Factor: 1

Mark if any of the following pertain to this waste:

☐ Pyrophoric	☐ Pesticides	☐ PCBs > 50 ppm
☐ Hydrophobic	☐ Dioxins	☐ Universal
☐ Biological	☒ Carcinogens	☐ Lab Pack
☐ Explosives	☐ Sulfides	☐ NESHAP-Regulated
☐ Radioactive	☒ Organics	(Part____, Subpart____)

Does the waste liberate any gases above PEL into the headspace?

	Yes	No	AMOUNT
Hydrogen Cyanide	☐	☒	
Hydrogen Sulfide	☐	☒	
Sulfur Dioxide	☐	☒	
Other Toxic Gas	☐	☒	

Specify:

V. SHIPPING INFORMATION:

6.1 TH 5/21/14

DOT Shipping Name: Hazardous waste liquid, N.O.S. (Trichloroethylene) ~~6~~, UN1710, PG III

DOT Hazard Class: 6.1 UN/NA Number: 1710 Packing Group: III Reportable Qty. (Lbs):

Required personnel protective equipment & procedures:

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

11140513

VI. COMPONENTS: Account for 100% of the waste components Include metals, UHCs TRI-reportable chemicals etc

CAS # (Optional)	Constituent	Range	Unit	CAS # (Optional)	Constituent	Range	Unit
	water	99.99 - 100	%			-	
79-01-6	trichloroethylene	0 - 78	ppm			-	
	Dirt and Rust	0 - .25	%			-	
		-				-	
		-				-	
		-				-	
		-				-	
		-				-	
		-				-	
		-				-	

Specific constituents of concern: ☑ Check here if the following constituents do not apply to the waste described in this document.

79-06-1	Acrylamide	N/A		7446-27-7	Lead phosphate	N/A	
309-00-02	Aldrin	N/A		628-86-4	Mercury fulminate	N/A	
20859-73-8	Aluminum phosphide	N/A		56-49-5	3-Methylcholanthrene	N/A	
7778-39-4	Arsenic acid	N/A		79-46-9	2-Nitropropane	N/A	
1303-28-2	Arsenic pentoxide	N/A		924-16-3	N-Nitrosodi-n-butylamine	N/A	
1327-53-3	Arsenic trioxide	N/A		1116-54-7	N-Nitrosodiethanolamine	N/A	
92-87-5	Benzidine	N/A		55-18-5	N-Nitrosodiethylamine	N/A	
98-07-7	Benzotrichloride	N/A		62-75-9	N-Nitrosodimethylamine	N/A	
31984-6	alpha-BHC	N/A		10595-95-6	N-Nitrosomethylethylamine	N/A	
319-85-7	beta-BHC	N/A		684-93-5	N-Nitroso-N-methylurea	N/A	
107-30-2	Chloromethylmethyl ether	N/A		930-55-2	N-Nitrosopyrrolidine	N/A	
111-44-4	sym-Dichloroethyl ether	N/A		7803-51-2	Phosphine	N/A	
542-88-1	sym-Dichloromethyl ether	N/A		50-55-2	Reserpine	N/A	
60-57-1	Dieldrin	N/A		1314-80-3	Sulphur phosphide	N/A	
56-53-1	Diethylstilbesterol	N/A		78-00-2	Tetraethyl lead	N/A	
122-66-7	1,2-Diphenylhydrazine	N/A		1314-32-5	Thallic oxide	N/A	
621-64-7	Di-n-propylnitrosamine	N/A		6533-73-9	Thallium carbonate	N/A	
	Dioxins	N/A		7791-12-0	Thallium chloride	N/A	
298-04-4	Disulfoton	N/A		10102-45-1	Thallium nitrate	N/A	
115-29-7	Endosulfan	N/A		12039-52-0	Thallium selenite	N/A	
33213-6-5	Endosulfan II	N/A		7446-18-6	Thallium sulfate	N/A	
	Endrin metabolites	N/A		62-56-6	Thiourea	N/A	
106-93-4	Ethylene dibromide	N/A		137-26-8	Thiram	N/A	
76-44-8	Heptachlor	N/A		99-35-4	1,3,5-Trinitrobenzene	N/A	
302-01-2	Hydrazine	N/A		1314-84-7	Zinc phosphide	N/A	
7439-92-1	Lead	N/A					

Waste characterization determined by: ☒ Process Knowledge ☒ Waste Analysis (Provide copy) ☒ MSDS/SDS(s) (Provide copy)

VII. Certification

I hereby certify and warrant that the information supplied on this form, and any attachments represents a complete and accurate identification and description of this waste material, its constituents and its known or suspected hazards I further certify and warrant that this information is the result of an analysis of a representative sample of the waste obtained and analyzed in accordance with testing procedures of the U S. Environmental Protection Agency or by the application of knowledge of the process generating the waste materials per EPA Guidelines.

PRINTED NAME: Joshua McDonald SIGNATURE: DATE: 5/15/14

11140513

TM Deer Park Services Limited Partnership

Waste Profile Document Modification Form

Customer:
GB Sales and Consulting
14303 Hartshill Drive
Houston, TX 7704

Generator:
Tubal-Cain Marine Services
8737 Old Yacht Club Road
Port Arthur, TX 77642

TMDP Waste Stream #: 11140513

Waste Description: Trichloroethylene

The following modifications shall be made to the referenced waste stream and this document shall become a part of the original waste profile document.

ADDITION(S):
Add NA3082 to PSN

DELETION(S):
Delete UN1710 from PSN

COMMENTS:

I hereby certify and warrant the above waste stream identification for the materials offered for disposal as appears on this form and the information contained on any attachments or supplements is true and correct. My certification is based on personal examination of the information submitted, or is based upon my inquiries of those individuals responsible for obtaining the information. I further certify and warrant that the identification is the result of an analysis of a representative sample obtained and analyzed in accordance with testing procedures specified by the U.S. Environmental Protection Agency or applying knowledge of the process generating the specific waste being offered for disposal.

Signature

Date 8/22/14

Title Logistics

Revised 9/24/01

Tubal Cain Gas Free Services TC TCE waste
Port Arthur, Texas TXR000080426

TRADEBE
Environmental Services LLC

TRADEBE TREATMENT AND RECYCLING, LLC

Profile # GBSC-02E-14

GENERATOR WASTE STREAM PROFILE SHEET

Process Code

Fax or email completed profile sheet to: **TTR Fax: 219-397-6411** **UIS Fax: 203-238-6744** usa.approvals@tradebe.com

A. GENERATOR INFORMATION:

MAILING OR SITE ADDRESS

USE CONTINUATION IF SITE & MAILING ADDRESSES ARE DIFFERENT

Generator #: 90733
Generator Name: **Tubal Cain**
Generator Address: 8700 Old Yacht clu Rd
City: **Port Arthur** State: **tx** Zip: **77642**
Contact Name: **Cade Durio**
Generator Phone: **409-960-9273**
Generator Fax:
Generator Email: **cade@tcmarineseervices.com**
Generator USEPA/Federal ID # : **TXR000080426**

CUSTOMER INFORMATION:

Customer #: 1100021863
Customer Name: GB Sales and Consulting
Customer Address: **14303 Hartshill Dr**
City: **Houston** State: **TX** Zip: **77044**
Contact Name: Greg Bowman
Customer Phone: 713-419-6076
Customer Fax:
Customer Email: gallenb1963@gmail.com
Customer Service/Sales Rep: Cargle / Hurst

If no ID number is the Generator a "Conditionally Exempt Small Quantity Generator?" ___ Yes ___ No
Generator SIC (or NAIC) Code: **488320** Generator State ID # (If applicable): **90733**
Please check if generator has "No Canada Disposal" policy ___ Yes X No
Please check if generator has "No Landfill" policy ___ Yes X No

B. WASTE STREAM INFORMATION:

Generator's Waste Name: Tricholorethylene Waste
Original Process Generating Waste: **Discarding barge / tank heels**

Is this waste exempt from RCRA regulation? ___ Yes X No
If "yes" explain or cite regulation on continuation (Example HHW, CESQG):
Current method of disposal:
Is this waste from a CERCLA cleanup site? ___ Yes X No
Waste determination was made by: __ Testing X Generator Knowledge X MSDS __ Sample __ Other
(Attach analytical, MSDS, or other supporting documentation used for waste determination)
Does the Waste have any of the following characteristics? ___ Yes *(if yes check all that apply)* X No

___ Oxidizer	___ Dioxin or Suspect	___ Water Reactive	___ Air Reactive	___ Organic Peroxide
___ Hexachrome	___ Infectious Waste	___ Radioactive	___ Chelating Agent	___ Lachrymator
___ Explosive	___ Shock Sensitive	___ Polymerizer	___ Pyrophoric	___ Inhalation Hazard, Zone ___

C. GENERAL CHARACTERISTICS:

Color: colorless	Physical state @ 70 F		Phases	BTU/lb	pH	
Odor: sweet	100 % liquid	___ aerosol	X single layer	___ <3000(*Ex:* water)	__ <2 (Acid)	__ 10.0-12.5
___ None	___ % solid	___ powder	___ double layer	___ 3,000-5,000	__ 2.0-4.0	__ >12.5 (Base)
X Mild	___ % sludge	___ other	___ >2 layers	X 5,000-10,000	X 4.0-10.0	
___ Strong	___ % debris		___ how many?	___ >10,000 (*Ex:* oil)		

Liquid Flashpoint: ___ <73 F ___ 73 to 99 F ___ 100 to 139 F ___ 140 to 200 F ___ >200 F X None
Boiling Point ___ Specific Gravity: 1.464 Total Halogens: ___ % Total Organic Carbon (TOC): ___ % Viscosity: ___

D. CHEMICAL COMPOSITION: Total of Maximum concentration must be > or = to 100%.

Constituents	Min%	Max%	ppm	Constituents	Min%	Max%	ppm
Trichloroethylene	95	100	%				
Water	0	5	%				
Dirt and Rust	0	.5	%				

Does the Waste contain any of the following?
Metal Pieces: ___ Yes X No *If yes, Describe Metal:*
Nitrocellulose: ___ Yes X No *Metal Powder or Flake:* ___ Yes X No *Sharps:* ___ Yes X No
Isocyanates: ___ Yes X No *Asbestos: (If yes must be double bagged and wetted)* ___ Yes X No
Reactive cyanide: (If yes indicate level in ppm) ___ Yes X No ___ *Range of reactive cyanide*
Reactive sulfide: (If yes, indicate level in ppm) ___ Yes X No ___ *Range of reactive sulfide*
PCBs: X *None* __ *0-49 ppm* __ *50-499 ppm* __ *500+ ppm* ***(If waste contains PCBs, certification form is required)***
Does the waste contain Benzene? ___ Yes X No
If yes, check all SIC codes that cover operations at your facility ___ Yes X No

__ 2812 __ 2813 __ 2816 __ 2819 __ 2821 __ 2822 __ 2823 __ 2824 __ 2833 __ 2834 __ 2835 __ 2836 __ 2841 __ 2842 __ 2843 __ 2844 __ 2851 __ 2861
__ 2865 __ 2869 __ 2873 __ 2874 __ 2875 __ 2879 __ 2891 __ 2892 __ 2893 __ 2896 __ 2899 __ 2911 __ 2999 __ 3312 __ 4953 __ 4959 __ 9511

If waste contains benzene and falls under one of the above SIC codes, Tradebe's benzene NESHAP form is required for each shipment

WASTE WATER ANALYSIS Profile # _____

For waste streams being managed through United's wastewater treatment operations only:

Phases: Oil ____ % Water ____ % Interface ____ % Sediments ____ % DNAPL ____ %

Petroleum Phase	Suspected Level	Actual Level	Aqueous Phase	Suspected Level	Actual Level	Aqueous Phase	Suspected Level	Actual Level
PCB			Copper			Cobalt		
Halogens			Cadmium			Mercury		
Solvents			Chromium			Arsenic		
Arsenic			Lead			Barium		
Cadmium			Nickel			Sulfides		
Chromium			Silver			Cyanides		
Lead			Zinc			Phenols		
			COD			Glycols		
			Iron			Selenium		

List Specific Solvents: _____

E. OTHER WASTE STREAM INFORMATION:

Is this waste a USED OIL per 40CFR PART 279? ___ Yes **X** No
If Yes, does the total halogen content exceed 1,000 ppm? ___ Yes ___ No
If Yes, can you identify the Chlorinated Constituent present in the oil? ___ Yes ___ No
If Yes, can you rebut the presumption that this material is a Hazardous Waste? ___ Yes ___ No
Is the Waste subject to RCRA 40 CFR Subpart CC controls (Are Volatile Organic Compounds >500ppmw)? **X** Yes ___ No
Does the Waste contain any Class I or Class II ozone-depleting substances? ___ Yes **X** No
Does waste contain EPCRA 313 chemicals identified in 40 CFR 372.65? ___ Yes **X** No
If yes list in Additional Information on Continuation Page.
Does this waste contain any Chemicals of Interest listed in *6 CFR Part 27 Appendix A* (Department of Homeland Security)? *If yes please list in Additional Information on Continuation Page.* ___ Yes ___ No

F. RCRA CHARACTERIZATION:

Is this a USEPA Hazardous Waste as defined in 40 CFR 261.3? **X** Yes ___ No
Is this a Universal Waste per 40 CFR part 273? ___ Yes **X** No
Please list any characteristic codes (D001-D043): D040

Does the waste contain UHCs above treatment standards levels? (40 CFR 268.48, 268.7) ___ Yes **X** No
If yes identify those chemicals in Appendix I - Underlying Hazardous Constituents
Please list any applicable "F" or "K" codes: N/A
Please list any applicable "U" or "P" codes N/A
Please list any state regulated codes: 0006204H

G. SHIPPING VOLUME & FREQUENCY:

___ Bulk Liquid (tanker) _____ Approximately how many gallons? ____ Bulk Solids(roll-off box, vacuum box, etc)
___ Cubic Yard Boxes **X** Totes 275 size in gallons ___ Metal **X** Plastic
___ Skid ___ Other *If other*, please describe: _____
___ Drums (Specify size) __85 __55 __30 __15 __5 ___ Metal ___ Plastic ___ Fiberboard
Is waste a combination package (e.g. Drum with inner containers or skid with cases of consumer products) ___ Yes ___ No
Shipping Frequency: Number of Units **12-14** Per ___ Month ___ Quarter **X** Year ___ Other _____

H. DOT SHIPPING INFORMATION

Is this a U.S. Department of Transportation (USDOT) Hazardous Material? **X** Yes ___ No
Shipping Name per 49 CFR 172.101 Hazardous Materials Table: Waste Trichloroethylene

Hazard Class or Division: 6.1 UN/NA #: **UN1710** Packing Group: __ I __ II **X** III ERG #: 160
Technical descriptors if required: _____ RQ if required: _____
DOT Special Permit that may apply (*Include copy of permit*): _____ Inhalation Hazard: Zone _____

I. GENERATOR CERTIFICATION:

I agree by affixing my authorized signature that I hereby certify that the above and attached description is complete and accurate and that no omissions of characteristics, composition or properties exist and that all known or suspected hazards have been disclosed. I also certify that each sample provided to Tradebe is representative of the waste material described above and give Tradebe permission and consent to make amendments and corrections and that I am an authorized agent of the Generator.

Name(print): Joshua L. McDonald Title: Product Control Coordinator
Signature: _____ Date: **5/28/2014**

INTERNAL USE ONLY: *Please indicate which Tradebe Facility(s) are being utilized for this Profile*

___ TTR, LLC, East Chicago, IN ___ TTR of TN, LLC, Millington, TN ___ United Oil Recovery, Inc Meriden, CT
___ Bridgeport United Recycling Bridgeport CT ___ United Oil Recovery Inc Newington NH
___ ECC Stoughton, MA ___ Zecco Northboro, MA ___ Norlite Corp Cohoes NY

APPENDIX 4

Daily Gauge Sheet (2 pages)

Tubal Cain Gas Free Services
Port Arthur, Texas

Completely full ~ 110"

TXR000080426

9-25-14 DAILY GAUGES				
TANK	PREV. LEVEL	CURR. LEVEL	WATER	
WATER 1	rust	60		oily water
WATER 2	89	rust		oily water
A-TANK	67	32	6	Lube oil
B-TANK	38	12	7	Low Flash
C1-TANK	39	39		Caustic
C2-TANK	11	11	0	Benzene
D-TANK	62	15	11	High Flash
E1-TANK	11	11		6 oil
E2-TANK	23	23		oily water
DIESEL TANK	15	15	0	
Crude 1	99	100		
Crude 2	104	104		
Crude 3	103	103		
Crude 4	106	103		
Crude Lights	46	38	17	

1 Flow

	Grey Split front	88	88	H	slop oil
outside berth	Grey split rear	9	9	H	slop oil

Notes
currently cleaning
Caustic
Benzene
6 Oil
water

ydrocarbon from water tanks

ydrocarbon from water tanks

APPENDIX 5

Waste Profile “dry rust” (2 pages)

Tubal Cain Gas Free Services
Port Arthur, Texas TC dry rust

TXR000080426

FOR OFFICE USE ONLY

APPROVAL NUMBER: SBL13635

EXPIRATION DATE: 06/28/2014

APPROVED BY: PRP

SPECIAL WASTE APPROVAL

(This Page for OFFICE USE ONLY)

H. ENVIRONMENTAL COMPLIANCE SUPERVISOR DECISION

1. ☒ Acceptable ☐ Not Acceptable Reason Metals, Benzene, RCI; Rust, Scale, and sludge from barge cleaning; Tubal-Cain Gas Free Services

2. Name: Phillip Porter, CHMM	3. Date: 06/28/2014
4. Signature: 2013.06.28 08:40:53 -06'00'	5. Phone: (303) 867-5510

I. INSTRUCTIONS/HANDLING PROCEDURES

This Section is to be completed by BOTH the Environmental Compliance Supervisor and the Facility Manager.

1. Disposal Method(s): ☒ Landfill ☐ Solidification ☐ Approved ADC ☐ Bioremediation ☐ Other:

2. Review and approval of waste is based upon a submitted documentation from generator/customer. Approval is granted subject to the enforcement of the following conditions. Failure to comply may result in rejection of the wastes.

   A. Customer/Generator shall receive a copy of this sheet upon approval and shall conform to all instructions/limitations noted herein.
   B. Loads may be randomly inspected upon receipt at the landfill to ensure wastes conform to description on Application.
   C. This material must be properly contained, bagged, or covered prior to and during shipment and disposal.
   D. The customer must contact the respective landfill to schedule the waste shipment 24 hours prior to delivery or alternative arrangements agreed upon by the facility management.

3. The conditions marked below apply to this waste stream.

APPROVAL CONDITION(S):

☐ BLANKET APPROVAL: The manifest accompanying each load of waste shall denote the specific waste generation address/location(s) for that load.

☐ CONDITIONAL APPROVAL: This is a conditional approval/extension. Upon receipt of additional analyses, this approval may be extended up to three (3) years from the original approval date. SPECIFIC CONDITION:

WASTE CONDITION(S):

☐ ABSORBENT MATERIALS: Absorbent material (pads, booms, diapers, socks, soils, etc.) must not be supersaturated so as to release free liquids on handling. Wastes that would not pass a paint filter test must be solidified prior to placement in the landfill.

☐ ASBESTOS CONTAINING MATERIAL (ACM): ☐ Friable ☐ Non-Friable

☐ CARE UNLOADING: Maintain integrity of container/packaging.

☒ FREE LIQUIDS/SLUDGE: Free liquids are prohibited from landfill disposal. Wastes containing free liquids must be solidified and able to pass a paint filter test prior to placement at active face.

☒ OTHER: Accept as a dry substance only/

LANDFILL SPECIAL HANDLING PROCEDURES:

☐ DISPOSAL LOCATION RESTRICTION: Dispose at least ___ feet from edge of slope or boundary.

☐ DUST: Materials may become airborne. Use appropriate control measures to prevent the material from becoming airborne.

☐ IRRITANT DUST: Materials may be dusty and are likely to cause irritation to skin and/or eyes. Use appropriate dust control measures and PPE as needed to prevent airborne dust and/or employee exposure. See MSDS for additional information.

☐ HOT: Potential Hot Load. Isolate from combustible materials. ☐ See MSDS for proper handling procedures:

☐ ODOR: Bury immediately upon arrival. ☐ ADDITIONAL HANDLING INSTRUCTIONS: Metals, Benzene, RCI; Rust, Scale, and sludge from barge cleani

☐ SLUDGE: Potential traction issue on work face.

☐ SPECIAL BURIAL REQUIREMENTS: Immediately cover waste ☐ MSW ☐ Dirt prior to compaction.

☐ SURVEY REQUIREMENT: Materials must be surveyed in or indicated on a grid.

Seabreeze Landfill
10310 FM 523
Angleton, TX 77515
PH: 979.864.4442
FX: 800.313.0680

FOR OFFICE USE ONLY
APPROVAL NUMBER: 13-635
EXPIRATION DATE:
APPROVED BY:

SPECIAL WASTE APPLICATION

Information utilized for completion of this form must originate from an authorized representative of the generator of the waste material.
The information on this form must be **COMPLETELY FILLED OUT, TYPE WRITTEN,** and the form must be **SIGNED BY AUTHORIZED REPRESENTATIVE.**

A. PROFILE INFORMATION

1. ☒ Initial ☐ Recertification, list prior approval number(s):
2. Have there been any changes to the composition of, or process generating this waste stream that would alter the characteristics of the waste stream?
☐ YES ☒ NO (Updated analysis may be required even if no change to process or composition.)

B. GENERATOR INFORMATION

1. Generator Name: Tubal-Cain Gas Free Services
2. Address: 8700 old Yacht Club Rd
City: Port Arthur | County: Jefferson
State: TX | Zip: 77642
3. Site Location (if different):
4. Contact Name: Cade Durio
5. Phone Number: (409) 960-9273 | 6. Fax Number: (409) 962-8806
7. Email Address: cade@tcmarineservices.com
8. State Facility ID # (if applicable): 90733
9. State Waste Code (if applicable): 00133071

C. CUSTOMER/BILLING INFORMATION

1. Billing Name: GB Sales and Consulting, LLC
2. Address: 14303 Hartshill Dr
City: Houston | County: Harris
State: TX | Zip: 77044
3. Contact Name: Greg Bowman
4. Phone Number: (713) 419-6076 | 5. Fax Number:
6. Email Address: gallenb1963@gmail.com
7. Is there a service agreement on file? ☐ YES ☐ NO
8. Agent / Consultant: Greg Bowman
9. Letter of Authorization: ☒ YES ☐ NO

D. TRANSPORTER/SHIPPING INFORMATION

1. Name:
2. Street Address:
City: | State: | Zip:
3. Phone Number: | 4. Fax Number:
5. Contact Name:
6. EPA or State Transporter ID #:
7. Designated Landfill(s):
8. Packaging: ☐ Bulk Solids ☐ Bulk Liquids ☐ Drums ☒ Roll-Off ☐ Dump Truck ☐ Tank Truck ☐ Vacuum Box ☐ Bagged
9. Estimated Volume: _____ ☐ Tons ☐ Cubic Yards ☐ Drums ☐ Gallons ☒ Other: _____
10. Shipping Frequency: 4 per: ☐ One Time Project ☒ Month ☒ Quarter ☐ Year ☐ Other: _____

E. WASTE STREAM INFORMATION

1. Common Name of Material or Waste Stream:
Rust, scale and sludge from barge cleaning (
2. Detailed Description of Process or How Generated (Attach additional sheet if needed):
Rust, scale, sludge (with trace hydrocarbon) from barge cleaning
3. Physical State at 70°F: ☒ Solid ☒ Semi-Solid ☐ Sludge ☐ Liquid ☐ Powder ☐ Other _____
4. Free Liquids: ☒ NO ☐ YES % Liquids:
5. Color: Brown, Black, Rust | 6. pH Range: 7
7. Odor: ☒ None ☒ Mild ☐ Significant Describe:
8. Flash Point: 118 ☒ °F ☐ °C
9. Reactive: ☒ NO ☐ YES with:
10. State Required Information (if applicable):

F. NON-HAZARDOUS DETERMINATION

1. Attached Document(s) (check all that apply): ☐ Not Applicable ☐ Process Knowledge ☐ MSDS ☒ Certified Analytical Report ☐ Exempt Waste
2. If Process Knowledge, provide details: Rust, scale and sludge solids removed after barge cleaning and repair - remove after drain liquid
3. If analytical data is attached, is the data derived from testing a representative sample in accordance with 40 CFR 261 and/or other applicable laws?
☒ YES ☐ NO Type of Sample: ☐ Composite ☒ Grab Analysis Provided:
4. If Exempt Waste, check applicable item below: ☐ UST Corrective Action – 40 CFR 261.4(b)(10) ☐ PCB Bulk Product Waste – 40 CFR 761.62 ☐ Oil & Gas E&P Waste – 40 CFR 261.4(b)(5) ☐ RCRA-Empty Containers – 40 CFR 261.7 ☐ Other (provide reference):

G. GENERATOR CERTIFICATION STATEMENT:

I hereby certify that all information contained herein is true and correct, and the material described is properly identified, classified, packaged, labeled, and prepared as indicated. I certify this waste is not hazardous or dangerous as defined by the U.S. EPA, or the state or province of origin. I certify this waste does not contain any regulated radioactive materials, that all known and suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by government or local authority, and does not contain PCB's regulated by TSCA or any other regulatory authority. I certify that all samples used for this analysis are representative of the materials described herein. I understand that all wastes may undergo inspection upon arrival at the designated facility and may be refused if the delivered material does not conform to the description herein. Notification will be provided immediately if there is a change in the composition of, or process generating this waste stream, prior to offering the waste for shipment or management.

Randy Cooper
AUTHORIZED REPRESENTATIVE NAME/TITLE

Tubal-Cain Gas Free Services
COMPANY NAME

AUTHORIZED REPRESENTATIVE SIGNATURE

06/24/2013
DATE COMPLETED

APPENDIX 6

E-mail from Seabreeze landfill to G. Bowman regarding “rust” with a low flashpoint

(12 pages)

From: Rose Bainum
To: Phillip Porter
Subject: Fw: Fwd: GB Sales-Tubal Cain***RUSH*****
Date: Wednesday, June 26, 2013 1:56:58 PM

From: Greg Bowman [mailto:gallenb1963@gmail.com]
Sent: Wednesday, June 26, 2013 12:51 PM
To: Rose Bainum
Subject: Fwd: GB Sales-Tubal Cain***RUSH*****

See below

Sent from my iPhone

Begin forwarded message:

From: greg B <gallenb1963@gmail.com>
Date: June 25, 2013, 8:24:05 PM CDT
To: Matt Bowman <mbowman@mlbconsultant.com>
Subject: Fwd: FW: GB Sales-Tubal Cain*RUSH*****

Tubal Cain cleans barges containing a variety of hydrocarbons including some low flash material like naptha, and rafinate. Small traces of this material may be contained in the sludge. In addition, sludge and rust scale may contain some trace elements of alcohols (i.e. - ethanol, isopropyl, butanol)

This stream was previously accepted by Waste Management as class 1 with the restriction of no free liquids.

---------- Forwarded message ----------
From: **Rose Bainum** <RoseBa@wasteconnections.com>
Date: Tue, Jun 25, 2013 at 6:41 PM
Subject: FW: GB Sales-Tubal Cain***RUSH*****
To: greg B <gallenb1963@gmail.com>

Greg please call me ASAP 2814135278. See below.

Respectfully,

Rose Bainum

Special Waste Consultant

Waste Connections, Inc.

www.wasteconnections.com

Seabreeze Environmental Facility

www.seabreezelandfill.com

10310 FM 523

Angleton, Texas

Cell - 979.481.3199

Fax - 800.313.0680 0r 800.861.9641

roseba@wasteconnections.com

From: Phillip Porter
Sent: Tuesday, June 25, 2013 6:26 PM
To: Rose Bainum
Subject: RE: GB Sales-Tubal Cain***RUSH*****

I am concerned about the low flash point. I know it is a solid and the hazardous waste rules apply but I want to ensure the safety of our facility and personal. I was not expecting to see a low flash point for scale and rust from a barge cleaning so there is something else causing the low flash point and that is not lubricating oil which has flash points above 150 to 200 F.

Please get me a description from the generator on what is causing the low flash.

From: Rose Bainum
Sent: Tuesday, June 25, 2013 1:27 PM
To: Phillip Porter
Cc: Bobby Howell; Sandy Roberts; Jeremy King
Subject: GB Sales-Tubal Cain***RUSH*****
Importance: High

Please review

Respectfully,

Rose Bainum

Special Waste Consultant

Waste Connections, Inc.

www.wasteconnections.com

Seabreeze Environmental Facility

www.seabreezelandfill.com

10310 FM 523

Angleton, Texas

Cell - 979.481.3199

Fax - 800.313.0680 0r 800.861.9641

roseba@wasteconnections.com

From: Rose Bainum [mailto:rosebainum@yahoo.com]
Sent: Tuesday, June 25, 2013 2:15 PM
To: Rose Bainum
Subject: GB Sales-Tubal Cain

From: Rose Bainum <RoseBa@WasteConnections.com>
To: '"rosebainum@yahoo.com"' <rosebainum@yahoo.com>
Sent: Tuesday, June 25, 2013 2:01 PM
Subject: FW: Pls find the ammeded Report with QC Details

Respectfully,

Rose Bainum

Special Waste Consultant

Waste Connections, Inc.

www.wasteconnections.com

Seabreeze Environmental Facility

www.seabreezelandfill.com

10310 FM 523

Angleton, Texas

Cell - 979.481.3199

Fax - 800.313.0680 0r 800.861.9641

roseba@wasteconnections.com

From: Greg Bowman [mailto:gallenb1963@gmail.com]
Sent: Tuesday, June 11, 2013 7:05 PM
To: Rose Bainum
Subject: Fwd: Pls find the ammeded Report with QC Details

Hi rose - here is analytical i mentioned earlier. I will get you the profile shortly.

Sent from my iPhone

Begin forwarded message:

> **From:** Cade Durio <Cade@tcmarineservices.com>
> **Date:** June 11, 2013, 1:37:02 PM CDT

To: "Greg Bowman (gallenb1963@gmail.com)" <gallenb1963@gmail.com>
Subject: FW: Pls find the ammeded Report with QC Details

From: CHEMTEX [mailto:chemtexpa@sbcglobal.net]
Sent: Friday, October 26, 2012 1:39 PM
To: randy
Cc: Cade Durio
Subject: Fw: Pls find the ammeded Report with QC Details

CHEMTEX
3082 25th St.
PORT ARTHUR, TX 77642.
Phone: (409) 983-4575
Fax: (409) 982-1522
e-mail: chemtexpa@sbcglobal.net

--- On **Tue, 10/23/12, CHEMTEX <chemtexpa@sbcglobal.net>** wrote:

This report was sent Tuesday evening. Please let us know if there anything else you may need.

Thanks,

Angela

From: CHEMTEX <chemtexpa@sbcglobal.net>
Subject: Pls find the ammeded Report with QC Details
To: "Tubal-Cain" <cade@tcmarineservices.com>
Date: Tuesday, October 23, 2012, 6:21 PM

CHEMTEX
3082 25th St.
PORT ARTHUR, TX 77642.
Phone: (409) 983-4575
Fax: (409) 982-1522
e-mail: chemtexpa@sbcglobal.net

CHEMTEX
Environmental & Industrial Hygiene Services
3082 25th Street, Port Arthur, Texas 77642 (409) 983-4[illegible] FAX (409) 982-1522
5544 Leopard Street, Corpus Christi, Texas 78408 (361) 299-9900 FAX (361) 299-1155
138 S. Cities Service Hwy., Sulphur, Louisiana 70663 (337) 626-2121 FAX (337) 626-2126
401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Tubal-Cain Gas Free Services, Inc.
8700 Old Yacht Club Rd.
Port Arthur, TX 77642

Attn: Mr. Cade Durio/Randy Cooper
Phone: 962-8800 Fax: 962-8806
Email: cade@tcmarineservices

Reporting Date: 10/23/12
Sample Matrix: Solid
Date Collected: 10/04/12
Time Collected: 6:00
Collected by: Randy Cooper
Date Received: 10/04/12
Time Received: 12:45pm
CHEMTEX File #: P12100131A

AMENDED RESULTS OF ANALYSIS FOR CHEMTEX FILE #: P12100131

PROJECT: Kirby 28049
SITE/LOCATION: TCGF

CHEMTEX ID	Sample ID	Parameter	Units	Results	RL	Reg Limit
P12100131	RUST SCALE	**TCLP Metals**				
		TCLP Arsenic	mg/L	<0.05	0.050	5.0
		TCLP Barium	mg/L	0.201	0.200	100.0
		TCLP Cadmium	mg/L	<0.05	0.050	1.0
		TCLP Chromium	mg/L	<0.05	0.050	5.0
		TCLP Lead	mg/L	<0.05	0.050	1.0
		TCLP Selenium	mg/L	<0.05	0.050	5.0
		TCLP Silver	mg/L	<0.05	0.050	5.0
		TCLP Mercury	mg/L	0.0025	0.0004	0.2
		TCLP Benzene	mg/L	0.064	0.005	0.5

RL: Reporting Limit.

Method References/Analysis Dates & Analysts

Parameter	Method Reference	Date Analyzed/Analyzed By
TCLP Metals	SW-846 1311/6010B	10/09/12 PSL
TCLP Mercury	SW-846 1311/7470A	10/12/12 PSL
TCLP Benzene	SW-846 1311/8021B	10/15/12 TRS

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CHEMTEX
Environmental & Industrial Hygiene Services
3082 25th Street, Port Arthur, Texas 77642 (409) 983-4575 FAX (409) 982-1522
5544 Leopard Street, Corpus Christi, Texas 78408 (361) 299-9900 FAX (361) 299-1155
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401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Tubal-Cain Gas Free Services, Inc.
8700 Old Yacht Club Rd.
Port Arthur, TX 77642

Attn: Mr. Cade Durio/Randy Cooper
Phone: 962-8800 Fax: 962-8806
Email: cade@tcmarineservices

Reporting Date: 10/23/12
Sample Matrix: Solid
Date Collected: 10/04/12
Time Collected: 6:00
Collected by: Randy Cooper
Date Received: 10/04/12
Time Received: 12:45pm
CHEMTEX File #: P12100131A

AMENDED RESULTS OF ANALYSIS FOR CHEMTEX FILE #: P12100131

PROJECT: Kirby 28049
SITE/LOCATION: TCGF

CHEMTEX ID	Sample ID	Parameter	Units	Results	RL
P12100131	RUST SCALE	Reactive Cyanide	mg/kg	<5	5
		Reactive Sulfide	mg/kg	<10	10
		Ignitability	° F	118	---
		Corrosivity as pH	pH units	5.50	---

RL: Reporting Limit.

Method References/Analysis Dates & Analysts

Parameter	Method Reference	Date Analyzed/Analyzed By
Reactive Cyanide	SW-846/7.3.3	10/08/12 CHR
Reactive Sulfide	EPA SW-846/7.3.4	10/08/12 CHR
Ignitability	EPA 1010A	10/08/12 CHR
Corrosivity as pH	EPA 9040C	10/04/12 CHR

NOTICE/DISCLAIMER: The analytical results, opinions or interpretations contained in this report are based upon information and material supplied by the client for whose exclusive and confidential use this report has been made. No person or entity other than the client may relay on this report. Any such reliance will be unjustified. Any person other than the client, that reads this report does so at his or her own risk. The analytical results, opinions and/or interpretations expressed herein represent the best judgement of Chemtex, based on the information and instructions received from the client. Chemtex makes no warranty or representation, express or implied, of any type, and expressly disclaims same. This report shall not be reproduced, in whole or in part, without the written approval of Chemtex. In no event shall Chemtex be responsible for any damage greater than the amount that it received for the analysis per formed.

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Environmental & Industrial Hygiene Services
3082 25th Street, Port Arthur, Texas 77642 (409) 983-4[illegible] FAX (409) 982-1522
5544 Leopard Street, Corpus Christi, Texas 78408 (361) 299-9900 FAX (361) 299-1155
138 S. Cities Service Hwy., Sulphur, Louisiana 70663 (337) 626-2121 FAX (337) 626-2126
401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Tubal-Cain Gas Free Services, Inc.
8700 Old Yacht Club Rd.
Port Arthur, TX 77642

Reporting Date: 10/23/12
CHEMTEX File #: P12100131A

LABORATORY QUALITY CONTROL DATA
Surrogate Recovery

CHEMTEX #:	Parameter	Units	Recovery	% Rec. Limits
TCLP Benzene				
P12100131	4-Bromoflourobenzene	%	70	70-130
BTEX MB 101512	4-Bromochlorobenzene	%	106	70-130
BTEX LCS 101512	4-Bromochlorobenzene	%	96	70-130
BTEX MS 101512	4-Bromochlorobenzene	%	92	70-130

NOTICE/DISCLAIMER: The analytical results, opinions or interpretations contained in this report are based upon information and material supplied by the client for whose exclusive and confidential use this report has been made. No person or entity other than the client may relay on this report. Any such reliance will be unjustified. Any person other than the client, that reads this report does so at his or her own risk. The analytical results, opinions and/or interpretations expressed herein represent the best judgement of Chemtex, based on the information and instructions received from the client. Chemtex makes no warranty or representation, express or implied, of any type, and expressly disclaims same. This report shall not be reproduced, in whole or in part, without the written approval of Chemtex. In no event shall Chemtex be responsible for any damage greater than the amount that it received for the analysis per formed.

AIHA
nelap Accredited Laboratory

CHEMTEX
Environmental & Industrial Hygiene Services
3082 25th Street, Port Arthur, Texas 77642 (409) 983-4[illegible] FAX (409) 982-1522
5544 Leopard Street, Corpus Christi, Texas 78408 (361) 299-9900 FAX (361) 299-1155
138 S. Cities Service Hwy., Sulphur, Louisiana 70663 (337) 626-2121 FAX (337) 626-2126
401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Tubal-Cain Gas Free Services, Inc.
8700 Old Yacht Club Rd.
Port Arthur, TX 77642

Reporting Date: 10/23/12
CHEMTEX File #: P12100131A

LABORATORY QUALITY CONTROL DATA

Method Blank (mg/L)

QC Batch ID	MB ID	Parameter	CAS #	Result	RL
QbMA100912	DW100912MB	TCLP Arsenic	7440-38-2	<0.050	0.050
		TCLP Barium	7440-39-3	<0.200	0.200
		TCLP Cadmium	7440-43-9	<0.050	0.050
		TCLP Chromium	7440-47-3	<0.050	0.050
		TCLP Lead	7439-92-1	<0.050	0.050
		TCLP Selenium	7782-49-2	<0.050	0.050
		TCLP Silver	7440-22-4	<0.050	0.050
QbHg101212	DW101212MB	TCLP Mercury	7439-97-6	<0.004	0.004
QbBTEX101512	BTEX MB 101512	TCLP Benzene	71-43-2	<0.005	0.005

LCS (mg/L)

QC Batch ID	LCS ID	Parameter	Spk Added	LCS Result	LCS % Rec	% Rec Limit
QbMA100912	M100912LCS	TCLP Arsenic	1.000	1.006	101	80-120
		TCLP Barium	1.000	0.997	100	80-120
		TCLP Cadmium	1.000	1.010	101	80-120
		TCLP Chromium	1.000	1.015	102	80-120
		TCLP Lead	1.000	1.003	100	80-120
		TCLP Selenium	1.000	1.043	104	80-120
		TCLP Silver	1.000	0.980	98	80-120
QbHg101212	Hg101212LCS	TCLP Mercury	0.0050	0.0046	91	85-115
QbBTEX101512	BTEX LCS 101512	TCLP Benzene	0.020	0.020	98	70-130

Duplicate(mg/L)

QC Batch ID	Dup ID	Parameter	Sample Result	Sample Dup Result	RPD	RPD Limit
QbMA100912	P12100131Dup	TCLP Arsenic	<0.05	<0.05	---	20
		TCLP Barium	0.201	0.196	3	20
		TCLP Cadmium	<0.05	<0.05	---	20
		TCLP Chromium	<0.05	<0.05	---	20
		TCLP Lead	<0.05	<0.05	---	20
		TCLP Selenium	<0.05	<0.05	---	20
		TCLP Silver	<0.05	<0.05	---	20
QbHg101212	P12100040Dup	TCLP Mercury	0.0019	0.0019	0	20
QbBTEX101512	P12100321Dup	TCLP Benzene	<0.005	<0.005	---	20

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CHEMTEX
Environmental & Industrial Hygiene Services
3082 25th Street, Port Arthur, Texas 77642 (409) 983-4[illegible]982-1522
5544 Leopard Street, Corpus Christi, Texas 78408 (361) 299-9900 FAX (361) 299-1155
138 S. Cities Service Hwy., Sulphur, Louisiana 70663 (337) 626-2121 FAX (337) 626-2126
401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Tubal-Cain Gas Free Services, Inc.
8700 Old Yacht Club Rd.
Port Arthur, TX 77642

Reporting Date: 10/23/12
CHEMTEX File #: P12100131A

LABORATORY QUALITY CONTROL DATA
MS and MSD (mg/L)

QC Batch ID	MS ID	Parameter	Sample Result	MS Spk Added	MS Result	MS % Rec	% Rec Limit
QbMA100912	P12100131MS	Arsenic	<0.05	2.000	1.917	96	70-130
		Barium	0.201	2.000	2.053	93	70-130
		Cadmium	<0.05	2.000	1.949	97	70-130
		Chromium	<0.05	2.000	1.916	96	70-130
		Lead	<0.05	2.000	1.712	86	70-130
		Selenium	<0.05	2.000	1.938	97	70-130
		Silver	<0.05	2.000	1.858	93	70-130
QbHg101212	P12100040MS	Mercury	0.0019	0.00200	0.00388	100	70-130
QbBTEX101512	P12100321MS	Benzene	<0.005	0.020	0.022	112	70-130

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3082 25th Street, Port Arthur, Texas 77642 (409) 983-4[illegible] FAX (409) 982-1522
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138 S. Cities Service Hwy., Sulphur, Louisiana 70663 (337) 626-2121 FAX (337) 626-2126
401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Tubal-Cain Gas Free Services, Inc.
8700 Old Yacht Club Rd.
Port Arthur, TX 77642

Reporting Date: 10/23/12
CHEMTEX File #: P12100131A

LABORATORY QUALITY CONTROL DATA

Method Blank (mg/kg)

QC Batch ID	MB ID	Parameter	Result	RL
QbRCS100812	DW100812MB	Reactive Cyanide	<5	5
QbRCS100812	DW100812MB	Reactive Sulfide	<10	10

LCS (mg/kg)

QC Batch ID	LCS ID	Parameter	Spk Added	LCS Result	LCS % Rec	% Rec Limit
QbRCS100812	CVA100812LCS	Reactive Cyanide	10	9.8	98	80-120
QbRCS100812	SUL100812LCS	Reactive Sulfide	10	10.2	102	80-120
QbFP100812	Pxyl100812LCS	Ignitability (^{o}F)	80	81	---	78-82
QbpH100412	12W046	pH (pH units)	7.00	7.01	---	6.90-10.10*

Duplicate (mg/kg)

QC Batch ID	Dup ID	Parameter	Sample Result	Sample Dup Result	RPD	RPD Limit
QbRCS100812	P12100131Dup	Reactive Cyanide	<5	<5	---	20
QbRCS100812	P12100131Dup	Reactive Sulfide	<10	<10	---	20
QbFP100812	P12100131Dup	Ignitability (^{o}F)	118	120	0	20
QbpH100412	P12100131Dup	pH (pH units)	5.50	5.51	0	20

* Tolerance

CNReddy

Dr. C. N. Reddy, Ph.D, CIH, ASP
Laboratory Director

cdb/amd/CNR

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CHEMTEX

3082 25th Street, Port Arthur, TX 77642
Phone:(409)983-4575; Fax:(409)982-1522
Email:pa@chemtexas.com

CHAIN OF CUSTODY RECORD
ENVIRONMENTAL
ANALYTICAL SERVICES REQUEST

Tubal Cain Gas Free Services
Port Arthur, Texas

CLIENT: TUBAL-CAIN GAS FREE SERVICES
Attn: CADE DURIO/ RANDY COOPER
Adress: 8700 Old Yacht Club Rd. Port Arthur, TX 77642
Billing Adress: P.O. Box 2364 Beaumont, tx 77704
Samples Collected By: Randy Cooper

Phone: (409) 962-8800
Fax: (409) 962-8806
Email: cade@tcmarineservices.com
P.O.#:
Project No:
Project: Kirby 28049
Site/Location: TCGF

Expected Turn Around Time
- [ ] Emergency Rush
- [ ] 2-4 hrs Rush
- [ ] 24 hrs Rush
- [ ] 48 hrs Rush
- [x] 5-7 Days
- [ ] 7-14 Days
- [ ] Non-Regulatory
- [ ] Regulatory

Sample Matrix Codes: Drinking Water-DW; Ground Water-GW;Liquid Waste-LW; Oils-O; Paint Chips-PC; Sand-Sn; Sludge-Sl; Soil/Solid-S; Solid Waste-SW; Water-W; Wipes-WP; Waste Water-WW;

CHEMTEX# (Lab Use Only)	Sample Identification	Collection Date	Collection Time	Sample Matrix	Comp. / Grab	Chemical Preservative	Sample Containers No.	Sample Containers Size	Sample Containers Type	TCLP METALS	TCLP BENZENE	RCI				
P1210131	RUST SCALE	10/4/2012	6:00	SOLID	Grab	None	1		G	x	x	x				

Analysis Requested

Special remarks: Samples must be preserved on ice after collection and must be transported in ice chest.
Temperature(Lab):
Comments (if any): PLEASE ALSO EMAIL RESULTS TO : randy@tcmarineservices.com
Non-Regulatory

Relinquished by:	Date&Time:	Relinquished by:	Date&Time:
Randy Cooper	10/4/12 1100 Am	Sadie	10/4/12 12:45 Pm
Relinquished by:	Date&Time:	Relinquished by:	Date&Time:

Facilities also available at: 5544 Leopard St., Corpus Christi, TX 78408; (361)299-9900 cc@chemtexas.com and 138 S. Cities Service Hwy., Sulphur, LA 70663 (337) 626-2121 lc@chemtexas.com

NOTICE / DISCLAIMER: Client has asked Chemtex to perform the analyses listed above, on the samples described herein. Any analytical results, opinions or interpretations which may be provided to Client are based upon the information and material supplied by Client, for whose exclusive and confidential use a report will be made. No person or entity other than Client may rely on any such report. Any such reliance will be unjustified. Any person, other than Client, that reads or relies on any such report, does so at his or her own risk. Chemtex makes no warranty or representation, express or implied, of any type, and expressly disclaims same. Any report provided by Chemtex shall not be reproduced, in whole or in part, without the written approval of Chemtex. In no event shall Chemtex be responsible for any damage greater than the amount that it received for performing some or all of the analyses listed above

TXR000080426

APPENDIX 7

Example rejected manifests

(13 pages)

Page 1 – Ecowerks intake form

Pages 2-4 Rejected manifests

Pages 5-13 Internal Tubal Cain spreadsheet indicating waste disposition

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

EcoWerks

6200 Procter St. Ext.,
Port Arthur, TX 77642
Office: 409-962-7480 www.EcoWerks.com Fax: 409.962.7480

Serving Industry, preserving our environment.

PLANT INTAKE **(CIRCLE ONE/OR BOTH)** **WASHOUT**

Job #: 092313.03 **On Going Job:** YES OR NO

Date / Fecha: 9 / 23 / 2013 **Time In / Tiempo Adentro:** 1220 am / pm

Client: GB Sales **Generator:** Tubal Cain **Transporter:** EWI
Cliente Generador Transporador

PLANT INTAKE

Quantity Received: [illegible] Bbls = 5000 Gals **Manifest/BOL#** 005794211
Cantidad Recibida

VEHICLE / CONTAINER #: TR601

START TIME:
FINISH TIME:

Description of Contents: barge tankwash water
Descripcion del contenido

WASHOUT

☐ Vacuum Truck / Super Sucker 70 bbl — Carro Del Vacio Lechon Estupendo
☐ Tanker 130 bbl — Petrolero
☐ Roll off Box — Caiga la caja
☐ Containment Berm
☐ Vacuum Box — Carro caja
☐ Frac Tank — Tenque De Frac
☐ Poly Tanks: _____ gallons — Tenques Poly galones
☐ Other / Otro: _____

VEHICLE / CONTAINER #: _____
Vehicul / del envase Onumero

Quantity of Solids: _____ Drums
Cantidad de solidos

TYPE OF SOLIDS: _____

Reject

CONDITION OF EQUIPMENT UPON ARRIVAL / CONDICION DEL EQUIPO SONBRE LLEGADA

☐ Slight Oily Film — Pelicula Aceitosa Leve
☐ Heavy Oily Film — Pelicula Aceitosa Pesada
☐ Thick Oil on Walls & Floor — Aceite Grueso en las Paredes Y Piso
☐ Slight Dagree of Dirt — Gredo leve de suciedad
☐ Moderate Degree of Dirt — Grado Moderado de suciedad
☐ Heavy Degree of Dirt — Grado pesado de suiedad
☐ Heavy Dirt, Rust, Grease, Sludge — Suciedad pesada, Moho, Grasa, Lodo
☐ Other: — Otro

Dropped off: YES OR NO

I agree with the above condition of the equipment / Convengo con la condicion antedicha del equipo

Client Representative: Gerald Edwards
Representante Del Cliente

CONDITION OF EQUIPMENT UPON DEPARTURE

CLEANING START TIME: _____ **CLEANING FINISH TIME:** _____ **TOTAL CLEANING TIME:** _____

Equipment cleaning is: Satisfactory / Satisfactorio — Unsatisfactory - Why: / Insatisfactorio - porque

Date / Fecha: / / 2013 **Time Out / Tiempo Fuere de:** _____ am / pm

Client Rep. Signature: _____ **Print Name:** _____
Representante Del Cliente Firma

*******MY SIGNATURE ALSO INDICATES THAT I ACKNOWLEDGE THE AMOUNT OF SOLIDS IN THE ABOVE CONTAINMENT*******

EcoWerks Rep. Signature: _____

CLEAN NOTIFICATION:

DATE: _____ COMMENTS: _____

TIME: _____

NOTIFIED: _____

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002333637 GBF

5. Generator's Name and Mailing Address: Tubal-Cain Gas Free, 8700 Old Yacht Club Rd., Port Arthur, TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: Ecowecks
U.S. EPA ID Number

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: Ecowecks, 1090 Peaches St, Port Arthur, TX 77642
U.S. EPA ID Number
Facility's Phone: 409-982-6069

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. Non DOT Non RCRA City Water	1	TT	5,000	gal	
	2.					
	3.					
	4.					

HC
Pulled & sent to UR

14. Special Handling Instructions and Additional Information

Rejected

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Cody Borron
Signature
Month Day Year: 12 26 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Gerald Edwards
Signature
Month Day Year: 12 26 13
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☒ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: R. DeLosSantos
Signature
Month Day Year: 12 26 13

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Rejected

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1 Generator ID Number: 90733

2 Page 1 of

3 Emergency Response Phone

4. Manifest Tracking Number: 002333704 GBF

5 Generator's Name and Mailing Address: Tubal Cain Marine
8800 old yacht club Rd.
Port Arthur, Tx 77642

Generator's Phone: 409 962 8800

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Ecowerks

U S EPA ID Number

7 Transporter 2 Company Name

U S EPA ID Number

8 Designated Facility Name and Site Address: Ecowerks
6200 Procter St. Ext
Port Arthur, Tx 77642

Facility's Phone: 409 962 6469

U S EPA ID Number

9a HM	9b. U.S. DOT Description (including Proper Shipping Name Hazard Class ID Number and Packing Group (if any))	10. Containers No.	Type	11 Total Quantity	12 Unit Wt./Vol.	13 Waste Codes		
	1 NON DOT, NON RCRA, Barge wash water	1	TT	5000	G			
	2							
	3							
	4							

14 Special Handling Instructions and Additional Information

Rejected

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Conner Trahan

Signature

Month 2 Day 14 Year 14

16 International Shipments ☐ Import to U S ☐ Export from U S Port of entry/exit:

Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Gerald Edwards

Signature

Month 2 Day 14 Year 14

Transporter 2 Printed/Typed Name

Signature

Month Day Year

18. Discrepancy

18a Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b Alternate Facility (or Generator)

U S EPA ID Number

Facility's Phone:

18c Signature of Alternate Facility (or Generator)

Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1 2 3 4

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name

Signature

Month Day Year

GENERATOR

INT'L

TRANSPORTER

DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002333729 GBF

5. Generator's Name and Mailing Address: Tubal Cain Marine, 8737 Old Yacht Club Rd., Port Arthur, Tx 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: Ecoworks
U.S. EPA ID Number

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: Ecoworks, 6200 Proctor St. Ext., Port Arthur, TX 77642
U.S. EPA ID Number
Facility's Phone: 409-962-7469

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON DOT, NON RCRA, Barge Wash Water	1	TT	5000	G	
	2.					
	3.					
	4.					

REJECTED

14. Special Handling Instructions and Additional Information

GENERATOR

16. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Carmen Trahan
Signature
Month 2 Day 28 Year 14

TRANSPORTER INTL

18. International Shipments: ☐ Import to U.S. ☐ Export from U.S.
Port of entry/exit:
Transporter signature (for exports only):
Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Gerald Edwards
Signature
Month 2 Day 28 Year 14

Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Charity District 8
Signature: Charity Schulte
Month 02 Day 28 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

to prevent fire while working

over product

custom	Trans/vendor	PO	Project	Date	Job	Manifest	facility	Invoice	FRT Bill	Disp bill	Other invoice	Gallons/to	Notes
TC	SKS	GF 11331		6/15/2012	solids disposal	005803276 jjk	Seabreeze	12034	4780			11 totes	
TC	K3	GF 11391		6/18/2012	water blanket	003444153 jjk	lonestar	12036	103510			5,040	
TC	K3	GF 11391		6/18/2012	water blanket	003444155 jjk	lonestar	12036	103510			5,880	
TC	K3	GF 11391		6/18/2012	water blanket	003444156 jjk	lonestar	12036	103510			5,880	
TC	K3	GF 11391		6/18/2012	water blanket	005259937 fle	lonestar	12036	103510			5,124	
TC	K3	GF 11391		6/18/2012	water blanket	003444154 JJK	Newpark	12036	103510			5,880	
TC	K3	GF 11391		6/19/2012	water blanket	009998474 jjk	lonestar	12036	103510			5,124	
TC	K3	GF 11391		6/19/2012	water blanket	005259923 fle	lonestar	12036	103510			6,000	
TC	K3	GF 11400		6/22/2012	OW	007131990 JJK	Newpark	12037	103510			5,880	
TC	K3	GF 11400		6/22/2012	OW	007131994 JJK	Newpark	12037	103510			5,880	
TC	K3	GF 11407		6/29/2012	OW	001118208jjk	Newpark	12047	103903			5,100	
TC	K3	GF 11407		6/29/2012	OW	009998210jjk	Newpark	12047	103903			5,000	
tc	SKS	GF 11470		7/2/2012	OW	005803287 JJK	lonestar	12048	4923			4,000	
TC	K3	high ph		7/2/2012	OW	009998231 jjk	Newpark	12062	103903				
tc	SKS	GF 11468		7/3/2012	Caustic	4247A & B	Rapid	12046	4931			4,200	Used to neutralize
TC	K3	GF 11470		7/12/2012	OW	007131993 JJK	lonestar	12048	104363			5,460	
TC	SKS	GF 11469		7/13/2012	Caustic to riverside	BOL 5515 B	Riverside	12056	4989			4,200	
TC	donovan	GF-11544		7/16/2012	High PH, delivery of		TC	12062	2585				
tc	SKS	GF-11544		7/17/2012	High PH, .39 per gal	005803304 JJK	lonestar	12062	5035			5,000	
tc	SKS	GF-11544		7/17/2012	High PH, .39 per gal	005803303 JJK	lonestar	12062	5032			5,000	
tc	K3	GF 11471		7/17/2012	OW	BOL 238965	Ecowerks	12061	104341			5,964	
TC	SKS	GF-11544		7/23/2012	High PH, .39 per gal	005803309 JJK	lonestar	12062	5084			5,000	
tc	SKS	GF-11544		7/24/2012	High PH, .39 per gal - white take got messed up. PH to 4 then bounce to brouwn tank - two loads water.	005803310 JJK	lonestar	12062	5093			5,000	
tc	SKS	GF-11544		7/27/2012	High PH, .39 per gal	005803313 JJK	lonestar	12062				5,000	
tc	Alamo	GF-11544		7/27/2012	High PH, .39 per gal	bol 11417	Alamo oil	12062				4,000	
TC	donovan	GF 11566		8/6/2012	TC water	007617746 JJK	Newpark	12082	2829				
TC	donovan	GF 11566		8/6/2012	TC water	007617745 JJK	Newpark	12082	2829				
TC	donovan	GF 11566		8/7/2012	TC water	007617749 JJK	Ecowerks	12082	2829				
TC	donovan	GF 11566		8/7/2012	TC water	007131992 JJK	Ecowerks	12082	2829				
TC	donovan	GF 11566		8/7/2012	TC water	003444166 JJK	Ecowerks	12082	2829				
TC	donovan	GF 11566		8/7/2012	TC water	003444167 JJK	Ecowerks	12082	2829				
TC	SKS	GF 11567		8/10/2012	Caustic		Rapid	12076					
TC	SKS	GF 11568		8/14/2012	Caustic		Rapid	12077				4,100	
TC	donovan	GF11624		8/17/2012	Barge water	bol 2757	Ecowerks	12089	2859			5,460	
TC	donovan	GF11624		8/17/2012	Barge water	bol 2758	Ecowerks	12089	2859			4,620	
TC	donovan	GF11624		8/17/2012	Barge water	bol 2759	Ecowerks	12089	2859			4,620	
TC	donovan	GF11624		8/17/2012	Barge water	bol 2760	Ecowerks	12089	2859			5,460	
TC	SKS	GF11624		8/18/2012	Barge water	005803334 JJK	Lonestar	12089	5280			5,000	
TC	Debusk	GF11625		8/23/2012	Barge water	BOL 003444161 JJK	Ecowerks	12090	992			4,647	
TC	Debusk	GF11625		8/23/2012	Barge water	BOL 003444164 JJK	Ecowerks	12090	992			4,700	
TC	Debusk	GF11625		8/23/2012	Barge water	BOL 003444165 JJK	Ecowerks	12090	992			5,400	
TC	Debusk	GF11713		8/27/2012	water w/reject	003444162 JJK	Ecowerks	12115	1012			-	Water with soybean. pickup up but trlr did not leave yd
TC	Debusk	GF11713		8/28/2012	water w/reject	003444162 JJK	Ecowerks	12115	1057			4,800	first load to ecowerks, second load reject..then diggout at Baytown on 8/30 and washout of sludge from soybean project
TC	Debusk	GF11680		8/30/2012	Soybean solids	005795983 JJK	Seabreeze	12101	1056			15	
TC	Debusk	GF11680		8/30/2012	Soybean solids	005795984 JJK	Seabreeze	12101	1056			15	

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TC	Debusk	GF11713		8/30/2012	water w/reject	003444162 JJK	Ecowerks	12115		10021357			washout of sludge from soybean solids project
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795985 JJK	Seabreeze	12101	1056			15	
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795982 JJK	Seabreeze	12101	1056			15	
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795986 JJK	Seabreeze	12101	1056			15	
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795988 JJK	Seabreeze	12101	1059	6973		15	
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795989 jjk	Seabreeze	12101	1059	6973		15	
TC	Debusk	GF11713		8/31/2012	water	005795987 JJK	Ecowerks	12116	1058			4,500	
TC	Debusk	GF11713		9/4/2012	Water	005795990 JJK	Ecowerks	12117	1113	10021433		4,500	
TC	Debusk	GF11713		9/4/2012	Water (first load deduct 1 hr debusk, ecowerks charge is $	003444163 JJK	Ecowerks	12117	1113	10021433		4,400	
TC	Debusk	GF11713		9/7/2012	water	005795993 JJK	Ecowerks	12118	1184	10021490		4,500	
TC	Debusk	GF11681		9/10/2012	soybean sludge -	005795992 JJK	Newpark	12104	1133			4,602	
TC	Debusk	GF11681		9/11/2012	soybean sludge -	005795991 jjk	Newpark	12104	1184			4,532	
TC	Debusk	GF11681		9/11/2012	soybean sludge -	010397822 jjk	Newpark	12104	1184			4,511	
TC	Debusk	GF11681		9/13/2012	soybean sludge - brown frac	010397820 JJK	Seabreeze	12104	1184	6973		3,000	initial load on 9/12 for a few hours, then load went to seabreeze at
TC	Debusk	GF11713		9/14/2012	water	010397809 JJK	Ecowerks	12119	1184	10021544		5,600	
TC	Debusk	GF11713		9/14/2012	water	010397808 JJK	Ecowerks	12119	1184	10021544		5,600	
TC	Debusk	GF11713		9/20/2012	water	005795981 JJK	Ecowerks	12120	1201	10021612		5,400	
TC	Debusk	GF11713		9/20/2012	water	005795966 JJK	Ecowerks	12120	1201	10021612		5,400	
TC	Debusk	GF11814		9/25/2012	water, 1 load	005795980 jjk	Ecowerks	12129	1280	10021663		5,250	
TC	Debusk	GF11814		9/26/2012	water, 1 load	005795979 jjk	Ecowerks	12129	1280	10021676		5,400	
TC	Debusk	GF 11816		9/27/2012	Gulfmark, water	005795968 JJK	Lonestar	12131	1263	1160		1,470	800 frt
TC	GBSC	GF11813		9/28/2012	Ammonia Drums	GBSC0003	GBSC	12130				4 drums	
TC	Pulido	GF 11816		9/28/2012	Gulfmark, Rag	GBSC0001	Bluebonnet	12131	37708			6,500	1800 frt Fraction of water & oil Value Recovered
TC	Debusk	GF11815		9/28/2012	water, 1 load	005795970 JJK	Ecowerks	12132	1263	10021702		5,460	
TC	Pulido	GF 11816		10/1/2012	Gulfmark, Rag	GBSC0002	Bluebonnet	12131	37734			2,340	1800 frt
TC	Debusk	GF 11812		10/4/2012	Water - reject for	rec	Ecowerks	12139	1354	10021768			
TC	Debusk	GF 11812		10/8/2012	Water - reject for	rec	Ecowerks	12139	1355	10021798			
tc	TWM	GF 11812		10/10/2012	water	005795969 JJK	Ecowerks	12139	77452	10021816		4,900	
TC	Debusk	12154		10/12/2012	Water	005795976 JJK	Ecowerks	12154	1394	10021849		2,400	
TC	Debusk	12154		10/12/2012	water	005795977 JJK	Ecowerks	12154	1394	10021849		5,460	
TC	GBSC	12156		10/18/2012	delivery of totes		TC	12156					
TC	Pulido	12156		10/18/2012	Gulfmark (Extra)	TCM101812	VR	12156	37813	1013		3,000	Maybe related to above
tc	Debusk	12155		10/19/2012	wash water	005795974 JJK	Ecowerks	12155	1456	100201936		3,000	70 bbl, 65 per hr + 12%
TC	Debusk	12155		10/19/2012	wash water	005795975 JJK	Ecowerks	12155	1456	100201936		3,000	70 bbl, 65 per hr + 12%
TC	Debusk	12156		10/23/2012	Acrylic Acid Sodium	010397818 JJK	Newpark	12156	1507			4,077	
TC	Debusk	12156		10/23/2012	Acrylic Acid Sodium	010397819 jjk	Newpark	12156	1507			4,386	
TC	Debusk	12158		10/23/2012	soybean	0010397817 jjk	Ecowerks	12158	1507	10021969		5600	
TC	Debusk	12157		10/23/2012	Wash water	005795973 jjk	Ecowerks	12157	1507	10021965		5800	
TC	Debusk	12156		10/24/2012	Acrylic Acid Sodium Salt & wash water	010397814 jjk	Newpark	12156	1509			1,200	
TC	Debusk	12157		10/24/2012	Acrylic Acid Sodium Salt & wash water	010397814 jjk	Newpark	12157	1509			4,260	
TC	Debusk	12158		10/24/2012	soybean	010397816jjk	Ecowerks	12158	1554	10021969		5600	
TC	Debusk	12157		10/24/2012	Wash water	010397815jjk	Ecowerks	12157	1554	10021979		5460	
TC	Debusk	12186		10/25/2012	wash water	010397813 jjk	Ecowerks	12186	1512	10021994		5,600	
TC	Debusk	12186		10/26/2012	wash water	005795965jjk	Ecowerks	12186	1526	10022005		5,600	
TC	Debusk	12187		10/30/2012	wash water	005795963jjk	Ecowerks	12187	1561	10022034		5,600	
TC	Debusk	12187		10/30/2012	wash water	005795964jjk	Ecowerks	12187	1561	10022034		5,600	
TC	Debusk	12189		11/6/2012	wash water	005795962jjk	Ecowerks	12189	1614	10022122		5,000	
TC	Debusk	12190		11/6/2012	Wash water w/diethylene glycol	010397812jjk	Newpark	12190	1614			3,029	

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tc	Debusk	12188		11/8/2012	OW	005795960JJK	Ecowerks	12188	1649	10022155		5,000	
tc	Debusk	12188		11/8/2012	OW	005795961JJK	Ecowerks	12188	1649	10022155		5,000	
TC	Debusk	12191		11/9/2012	OW	005795959jjk	Ecowerks	12191	1647	10022169		5,000	
TC	Debusk	12191		11/9/2012	OW	005795958jjk	Ecowerks	12191	1647	10022169		5,000	
TC	Debusk	12192		11/12/2012	OW	005795956jjk	Ecowerks	12192	1646	10022186		5,000	
TC	Debusk	12192		11/12/2012	OW	005795957jjk	Ecowerks	12192	1646	10022186		5,000	
TC	Debusk	GF12066		11/19/2012	OW	005795955jjk	Ecowerks	12206	1731	10022232		5,000	
TC	Debusk	GF12066		11/19/2012	OW	005795954jjk	Ecowerks	12206	1731	10022232		5,000	
TC	Debusk	GF12067		11/26/2012	OW	005795953jjk	Ecowerks	12207	1741	10022266		5,000	
TC	Debusk	GF12067		11/26/2012	OW	005795952jjk	Ecowerks	12207	1741	10022266		5,000	
TC	Debusk	GF12068		11/27/2012	OW	005795951jjk	Ecowerks	12208	1739	10022282		5,000	
TC	Debusk	GF12068		11/27/2012	OW	005795950jjk	Ecowerks	12208	1739	10022282		5,000	
TC	SKS	GF12069		11/29/2012	hydrocarbon recovery	TCM112912	VR	12209	6015	1015		4,200	
TC	Debusk	GF12070		12/3/2012	OW	005795947jjk	Ecowerks	12210	1770	10022336		5,000	
TC	Debusk	GF12070		12/3/2012	OW	005795948jjk	Ecowerks	12210	1770	10022336		5,000	
TC	Debusk	GF12070		12/3/2012	OW	005795949jjk	Ecowerks	12210	1770	10022336		5,000	
TC	Debusk	GF12071		12/6/2012	OW	005795945jjk	Ecowerks	12211	1791	10022368		5,000	
TC	Debusk	GF12071		12/6/2012	OW	005795946jjk	Ecowerks	12211	1791	10022368		5,000	
TC	SKS	GF12072		12/7/2012	caustic	tcm120712b	Rapid	12212	6073			5,000	
TC	SKS	GF12071		12/7/2012	hydrocarbon	tcm120712a	VR	12211	6068			2,500	Oil to bluebonnet
TC	Debusk	GF12074		12/10/2012	WW, 70 bbl	005795931jjk	Ecowerks	12214	1845	10022384		2,940	70 bbl, 65 per hr + 12%
TC	Debusk	GF12074		12/10/2012	WW, 70 bbl	005795943jjk	Ecowerks	12214	1845	10022384		2,940	70 bbl, 65 per hr + 12%
TC	Debusk	GF12074		12/10/2012	WW, 70 bbl	005795944jjk	Ecowerks	12214	1845	10022384		2,940	70 bbl, 65 per hr + 12%
TC	Debusk	GF12074		12/10/2012	WW, 70 bbl	005795932jjk	Ecowerks	12214	1845	10022384		2,940	70 bbl, 65 per hr + 12%
TC	Debusk	GF12075		12/11/2012	OW	005795933jjk	Ecowerks	12215	1858	10022407		5,000	
TC	Debusk	GF12075		12/11/2012	OW	005795934jjk	Ecowerks	12215	1858	10022407		5,000	
TC	SKS	GF12073		12/12/2012	Caustic	BOL TCM121212 /	Rapid	12213	6125			4,500	
tc	Debusk	GF12123		12/13/2012	OW	005795935jjk	Ecowerks	12216	1857	10022437		5,000	
tc	Debusk	GF12123		12/13/2012	OW	005795936jjk	Ecowerks	12216	1857	10022437		5,000	
tc	Debusk	GF12124		12/17/2012	OW	005795941jjk	Ecowerks	12217	1863	10022462		5,000	
tc	Debusk	GF12124		12/17/2012	OW	005795942jjk	Ecowerks	12217	1863	10022462		5,000	
TC	Debusk	GF12124		12/18/2012	OW	005795937jjk	Ecowerks	12217	1880	10022462		5,000	
TC	Debusk	GF12124		12/18/2012	OW	005795938jjk	Ecowerks	12217	1880	10022462		5,000	
TC	Debusk	GF12124		12/18/2012	OW	005795939jjk	Ecowerks	12217	1880	10022462		5,000	
TC	SKS	GF12125		12/20/2012	Naptha water	BOL TCM122012 /7091	VR	12218	6198	1017		1,500	
TC	Debusk	GF12126		12/21/2012	OW	005795929jjk	Ecowerks	12219	1920	10022515		5,000	
TC	Debusk	GF12126		12/21/2012	OW	005795930jjk	Ecowerks	12219	1920	10022515		5,000	
tc	Debusk	GF12127		12/27/2012	OW	005795903JJK	Ecowerks	12220	1921	10022556		5,000	
tc	Debusk	GF12167		12/28/2012	OW	005795904jjk	Ecowerks	12223	1922	10022566		5,000	1666.5
tc	Debusk	GF12167		12/28/2012	OW	005795928jjk	Ecowerks	12223	1922	10022566		5,000	
TC	SKS	GF12128		12/29/2012	caustic	BOL TCM122912A /	rapid	12221	6274			3,950	37580 LBS, 9.514 LBS/GAL
TC	SKS	GF12128		12/29/2012	caustic	BOL TCM122912B /	rapid	12221	6273			3,100	30860 lbs, 9.95 lbs/gal
TC	Debusk	GF12168		1/2/2013	OW	005795927jjk	Ecowerks	12230	1948 & 9	122600		5,000	
TC	Debusk	GF12168		1/2/2013	OW	005795926jjk	Ecowerks	12230	1948 & 9	122600		5,000	
TC	Debusk	GF12169		1/2/2013	OW	005795925jjk	Ecowerks	12230	1948 & 9	122600		5,000	
TC	Debusk	GF12169		1/4/2013	OW	005795919jjk	Ecowerks	12231	1990	122632		2,940	
TC	Debusk	GF12169		1/4/2013	OW	005795920jjk	Ecowerks	12231	1990	122632		2,940	
TC	Debusk	GF12169		1/4/2013	OW	005795921jjk	Ecowerks	12231	1990	122632		2,940	
TC	Debusk	GF12169		1/4/2013	OW	005795922jjk	Ecowerks	12231	1990	122632		2,940	
TC	Debusk	GF12169		1/4/2013	OW	005795923jjk	Ecowerks	12231	1990	122632		2,940	
TC	Debusk	GF12169		1/4/2013	OW	005795924jjk	Ecowerks	12231	1990	122632		2,940	
TC	SKS	GF12171		1/7/2013	caustic	BOL TCM010713 /	Rapid	12233	6320			3,500	
TC	Debusk	GF12170		1/7/2013	OW	005795905jjk	Ecowerks	12232	1991	122643		5,000	
TC	Debusk	GF12170		1/7/2013	OW	005795906jjk	Ecowerks	12232	1991	122643		5,000	

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TC	Debusk	GF12172		1/9/2013	OW	005795907jjk	Ecowerks	12234	1992	122663		5,000	
TC	Debusk	GF12172		1/9/2013	OW	005795908jjk	Ecowerks	12234	1992	122663		5,000	
TC	Debusk	GF12247		1/14/2013	ow	005795909jjk	Ecowerks	12235	2031	122699		5,000	ran two, then ecowerks had problem so pushed remainder to
TC	Debusk	GF12247		1/14/2013	ow	005795910jjk	Ecowerks	12235	2031	122699		5,000	ran two, then ecowerks had problem so pushed remainder to
tc	Debusk	GF12248		1/15/2013	OW	005795911jjk	Ecowerks	12236	2029	122720		5,000	
TC	Debusk	GF12248		1/15/2013	OW	005795912jjk	Ecowerks	12236	2029	122720		5,000	
TC	Debusk	GF12249		1/16/2013	OW	005795918jjk	Ecowerks	12237	2030	122731		5,000	
TC	Debusk	GF12249		1/16/2013	OW	005795917jjk	Ecowerks	12237	2030	122742		5,000	
TC	Debusk	GF12250		1/17/2013	OW	005795916jjk	Ecowerks	12238	2028	122742		5,000	
TC	Debusk	GF12250		1/17/2013	OW	005795915jjk	Ecowerks	12238	2028	122742		5,000	Rejected
TC	Debusk	GF12251		1/22/2013	ow	005795913jjk	Ecowerks	12239	2115	122804		5,000	
TC	Debusk	GF12251		1/22/2013	ow	005795914jjk	Ecowerks	12239	2115	122804		5,000	
TC	Debusk	GF12251		1/22/2013	OW	005259924fle	Ecowerks	12239	2115	122804			
TC	SKS	GF12333		1/24/2013	Heavy Oil	7456	VR	12251	6454	122841			
TC	SKS	GF12333		1/24/2013	Heavy Oil	7456	VR	12251	6454	122841			
TC	SKS	GF12333		1/24/2013	Heavy Oil	7455	VR	12251	6553	122841			
TC	SKS	GF12333		1/26/2013	Heavy Oil	7458	VR	12251	6455	122841			
TC	SKS	GF12333		1/26/2013	Heavy Oil	7457	interstate	12251	6460	122841			
tc	Debusk	GF12326		1/28/2013	OW	005259925fle	Ecowerks	12244	2117	122849		5,000	
tc	Debusk	GF12326		1/28/2013	OW	005259922fle	Ecowerks	12244	2117	122849		5,000	
tc	Debusk	GF12327		1/30/2013	OW	005259927fle	Ecowerks	12245	2148	122876		5,000	
tc	Debusk	GF12327		1/30/2013	OW	005795861jjk	Ecowerks	12245	2148	122876		5,000	
tc	SKS	GF12333		2/1/2013	Heavy Oil	7529	VR	12251	6575	122841			No wash, third load to US, heavy oil
tc	SKS	GF12333		2/1/2013	Heavy Oil	7529	VR	12251	6575	122983			
tc	SKS	GF12328		2/1/2013	OW	005795862jjk	Ecowerks	12246	6550	122906		5,000	No wash, third load to US, heavy oil
tc	SKS	GF12328		2/1/2013	OW	005803453jjk	Ecowerks	12246	6550	122906		5,000	No wash, third load to US, heavy oil
TC	Debusk	GF12329		2/4/2013	OW	005795863jjk	Ecowerks	12247	2244	122924		5,000	truck schedule for next day, no
TC	Debusk	GF12329		2/4/2013	OW	005795865jjk	Ecowerks	12247	2244	122924		5,000	truck schedule for next day, no
TC	Debusk	GF12329		2/4/2013	OW	005795864jjk	Ecowerks	12247	2244	122924		5,000	truck schedule for next day, no
TC	Debusk	GF12330		2/5/2013	OW	005795867jjk	Ecowerks	12248	2244	122935		5,000	
TC	Debusk	GF12330		2/5/2013	OW	005795866jjk	Ecowerks	12248	2244	122935		5,000	
TC	Debusk	GF12331		2/6/2013	OW	005795869jjk	Ecowerks	12249	2244	122958		5,000	
TC	Debusk	GF12331		2/6/2013	OW	005795870jjk	Ecowerks	12249	2244	122958		5,000	
tc	SKS	GF12333		2/7/2013	Heavy oil	7602	VR	12251	6582	122983 / 1018		5,000	
tc	SKS	GF12333		2/7/2013	Heavy Oil	7601	interstate	12251	6583	122983			
TC	Debusk	GF12332		2/7/2013	OW	005795873jjk	Ecowerks	12250	2243	122974		5,000	
TC	Debusk	GF12332		2/7/2013	OW	005795872jjk	Ecowerks	12250	2243	122958		5,000	
TC	Debusk	GF12332		2/7/2013	OW	005795871jjk	Ecowerks	12250	2243	122974		5,000	
TC	Debusk	GF12414		2/11/2013	OW	005795874jjk	Ecowerks	12252	2242	123015		5,000	
TC	Debusk	GF12414		2/11/2013	OW	005795875jjk	Ecowerks	12252	2242	123015		5,000	
TC	Debusk	GF12415		2/14/2013	OW	005795876jjk	Ecowerks	12253	2285	123063		5,000	
TC	Debusk	GF12416		2/15/2013	OW	2033	Ecowerks	12254	2283	123074		5,300	
TC	Debusk	GF12417		2/21/2013	OW	005795879jjk	Ecowerks	12255	2364	123154		5,000	
TC	Debusk	GF12417		2/21/2013	OW	005795878jjk	Ecowerks	12255	2364	123154		5,000	
TC	Debusk	GF12417		2/21/2013	OW	005795877jjk	Ecowerks	12255	2364	123154		5,000	
TC	SKS	GF12418		2/21/2013	OW	BOL TCM022113 /	Bluebonnet	12259	6688			5,751	
TC	SKS	GF12419		2/22/2013	Caustic	TCM 022213 / 7758	rapid	12258	6735			3,002	
TC	Debusk	GF12420		2/22/2013	OW	005795885jjk	Ecowerks	12256	2364	123174		5,000	
TC	Debusk	GF12420		2/22/2013	OW	005795889jjk	Ecowerks	12256	2364	123174		5,000	
TC	Debusk	GF12420		2/22/2013	OW	005795883jjk	Ecowerks	12256	2364	123174		5,000	
TC	Debusk	GF12420		2/22/2013	OW	005795880jjk	Ecowerks	12256	2364	123174		5,000	
TC	Debusk	GF12420		2/22/2013	OW	005795888jjk	Ecowerks	12256	2364	123174		5,000	
TC	Debusk	GF12420		2/22/2013	OW	005795881jjk	Ecowerks	12256	2364	123174		5,000	
TC	Debusk	GF12420		2/22/2013	OW	005795882jjk	Ecowerks	12256	2364	123174		5,000	

custom	Trans/vendor	PO	Project	Date	Job	Manifest	facility	Invoice	FRT Bill	Disp bill	Other invoice	Gallons/to	Notes
TC	Debusk	GF12420		2/22/2013	OW	005795884jjk	Ecowerks	12256	2364	123174		5,000	
TC	Debusk	GF12420		2/22/2013	OW	005795886jjk	Ecowerks	12256	2364	123174		5,000	
tc	Debusk	GF12421		2/25/2013	OW	005795890jjk	Ecowerks	12257	2400	123202		5,000	
tc	Debusk	GF12421		2/25/2013	OW	005795891jjk	Ecowerks	12257	2400	123202		5,000	not sure about 3rd load
TC	Debusk	GF12494		3/11/2013	OW	005795893jjk	Ecowerks	12268	2518	123360		5,000	
TC	Debusk	GF12494		3/11/2013	OW	005795894jjk	Ecowerks	12268	2518	123360		5,000	
TC	Debusk	GF12494		3/11/2013	OW	005795892jjk	Ecowerks	12268	2518	123360		5,000	
TC	Debusk	GF12495		3/12/2013	OW	005795895jjk	Ecowerks	12269	2501	123374		5,000	delays at ecowerks
TC	Debusk	GF12495		3/12/2013	OW	005795896jjk	Ecowerks	12269	2501	123374		5,000	delays at ecowerks
TC	Debusk	GF12496		3/13/2013	OW	005795897jjk	Ecowerks	12270	2519	123399		3,000	
TC	Debusk	GF12496		3/13/2013	OW	005795898jjk	Ecowerks	12270	2519	123399		3,000	
TC	Debusk	GF12497		3/14/2013	OW	005795899jjk	Ecowerks	12271	2521	123427		2,500	
TC	Debusk	GF12498		3/18/2013	OW	005795900jjk	Ecowerks	12272	2592	123453		5,000	
TC	Debusk	GF12499		3/19/2013	OW	005795902jjk	Ecowerks	12273	2618	123461		5,000	
TC	Debusk	GF12499		3/19/2013	OW	005795901jjk	Ecowerks	12273	2618	123461		5,000	
TC	Debusk	GF12500		3/20/2013	OW	005795761jjk	Ecowerks	12274	2618	123491		5,000	
TC	Debusk	GF12500		3/20/2013	OW	005795762jjk	Ecowerks	12274	2618	123491		5,000	
TC	Debusk	GF12500		3/20/2013	OW	005795764jjk	Ecowerks	12274	2618	123491		5,000	
TC	Debusk	GF12500		3/20/2013	OW	005795765jjk	Ecowerks	12274	2618	123491		5,000	
TC	Debusk	GF12500		3/20/2013	OW	005795763jjk	Ecowerks	12274	2618	123491		5,000	
TC	Debusk	GF12501		3/21/2013	OW	005795755jjk	Ecowerks	12275	2685	123510		5,000	
TC	Debusk	GF12501		3/21/2013	OW	005795759jjk	Ecowerks	12275	2685	123510		5,000	
TC	Debusk	GF12501		3/21/2013	OW	005795760jjk	Ecowerks	12275	2685	123510		5,000	
TC	Debusk	GF12501		3/21/2013	OW	005795756jjk	Ecowerks	12275	2685	123510		5,000	
TC	SKS	GF12502		3/22/2013	OW / hydrocarbon	TCM032213 / 5020	VR	12276	6944			5,500	Included 500 gal light ends
TC	Debusk	GF12567		3/25/2013	OW	005795758jjk	Ecowerks	12283	2657	123544		5,400	
TC	Debusk	GF12567		3/25/2013	OW	005795757jjk	Ecowerks	12283	2657	123544		5,400	
TC	Debusk	GF12567		3/25/2013	OW	005795754jjk	Ecowerks	12283	2657	123544		4,200	
TC	donovan	GF12568		3/28/2013	OW	005795751jjk	Ecowerks	12284	4322	123589		4,500	
TC	Debusk	GF12568		3/28/2013	OW, 70 bbl	005795749jjk	Ecowerks	12284	2683	123589		2,940	
TC	Debusk	GF12568		3/28/2013	OW, 70 bbl	005795752jjk	Ecowerks	12284	2683	123589		2,940	
TC	SKS	GF12569		3/28/2013	Product Totes, 3 DHR	BOL 5035	VR	12285	6983			Totes	Totes on invoices 12285 and 12286
TC	SKS	GF12570		3/28/2013	Reacted Vam totes	005795810jjk	Seabreeze	12286	7026	8508		totes	Totes on invoices 12285 and 12286
TC	donovan	GF12571		3/29/2013	OW	005795698jjk	Ecowerks	12287	4322	123614		5,460	
TC	debusk	GF12571		3/29/2013	OW	005795699jjk	Ecowerks	12287	2684	123614		4,371	
TC	TWM	Soybean 2	soybean	4/3/2013	Soybean from 15	TCM040313 / 6354	VR	12281	77993			3,900	soybean from 15 totes
TC	Debusk	GF12572		4/4/2013	OW	005795700jjk	Ecowerks	12288	2727	123707		4,850	
TC	Debusk	GF12572		4/4/2013	OW	005795701jjk	Ecowerks	12288	2727	123707		5,577	
TC	Debusk	GF12573		4/5/2013	OW, 70 bbl	005795702jjk	Ecowerks	12289	2788	123722		2,940	
TC	Debusk	GF12573		4/5/2013	OW, 70 bbl	005795703jjk	Ecowerks	12289	2788	123722		2,940	
TC	Debusk	GF12573		4/5/2013	OW, 70 bbl	005795704jjk	Ecowerks	12289	2788	123722		2,520	
TC	Debusk	GF12574		4/8/2013	OW	005795707jjk	Ecowerks	12290	2788	123744		5,000	
TC	Debusk	GF12574		4/8/2013	OW	005795706jjk	Ecowerks	12290	2788	123744		5,000	
TC	Debusk	GF12574		4/8/2013	OW	005795705jjk	Ecowerks	12290	2788	123744		5,000	
TC	Miller	GF12575		4/9/2013	Hydrocarbon and	TCM040913	vr	12291	76419	123777		5,300	
TC	Debusk	GF12575		4/9/2013	OW	005795709jjk	Ecowerks	12291	2788	123763		5,000	
TC	SKS	GF12576		4/10/2013	caustic	8247A	rapid	12292	7087			4,888	Dec Pack Independence
TC	Bulk	12293		4/11/2013	Alcohol	BOL TCM041113 /	New Mexico	12296 and 12311 (credit)				6,000	credit for water load
TC	Debusk	GF12653		4/16/2013	OW	005795744jjk	Ecowerks	12311	2851	123860		4,888	
TC	Debusk	GF12653		4/16/2013	OW	005795746jjk	Ecowerks	12311	2851	123860		4,888	
TC	Debusk	GF12653		4/16/2013	OW	005795747jjk	Ecowerks	12311	2851	123860		4,888	
TC	SKS	GF12654		4/17/2013	caustic	TCM041713 / 8342	rapid	12312	7176			4,500	
TC	Debusk	GF12655		4/17/2013	OW	005795743jjk	Ecowerks	12313	2851	123906		5,500	
TC	Debusk	GF12655		4/17/2013	OW	005795745jjk	Ecowerks	12313	2851	123906		5,000	

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TC	Debusk	GF12655		4/19/2013	OW	005795742jjk	Ecowerks	12313	2852	123950		4,716	
TC	Debusk	GF12656		4/22/2013	OW	005795739jjk	Ecowerks	12314		123949		5,200	
TC	Debusk	GF12656		4/22/2013	OW	005795740jjk	Ecowerks	12314		123949		5,200	
TC	Debusk	GF12656		4/22/2013	OW	005795741jjk	Ecowerks	12314		123949		5,200	
TC	Debusk	GF12656		4/23/2013	OW	005795711jjk	Ecowerks	12314		123972		5,200	
TC	Debusk	GF12656		4/23/2013	OW	005795737jjk	Ecowerks	12314		123972		5,200	
TC	Debusk	GF12656		4/23/2013	OW	005795710jjk	Ecowerks	12314		123972		5,200	
TC	Debusk	GF12656		4/23/2013	OW	005795738jjk	Ecowerks	12314		123972		5,200	
TC	Debusk	GF12656		4/23/2013	OW	005795712jjk	Ecowerks	12314		123972		5,200	
TC	Debusk	GF12656		4/26/2013	OW	005795735jjk	Ecowerks	12314	2936	124022		5,200	
TC	Debusk	GF12657		4/29/2013	OW, 70 bbl	005795714jjk	Ecowerks	12315	2949	124050		2,800	
TC	Debusk	GF12657		4/29/2013	OW, 70 bbl	005795732jjk	Ecowerks	12315	2949	124050		2,800	
TC	Debusk	GF12657		4/29/2013	OW, 70 bbl	005795731jjk	Ecowerks	12315	2949	124050		2,940	
TC	Debusk	GF12657		4/30/2013	OW, 70 bbl	005795715jjk	Ecowerks	12315	2949	124074		2,800	
TC	Debusk	GF12657		4/30/2013	OW, 70 bbl	005795716jjk	Ecowerks	12315	2949	124074		2,940	
TC	Debusk	GF12657		4/30/2013	OW, 70 bbl	005795717jjk	Ecowerks	12315	2949	124074		2,800	
TC	Debusk	GF12657		5/1/2013	OW, 70 bbl	005795730jjk	Ecowerks	12315	3030	124110		2,800	
TC	Debusk	GF12657		5/1/2013	OW, 70 bbl	005795718jjk	Ecowerks	12315	3030	124110		2,800	
TC	Debusk	GF12657		5/1/2013	OW, 70 bbl	005795729jjk	Ecowerks	12315	3030	124110		2,940	
TC	Debusk	GF12657		5/3/2013	OW, 70 bbl	005795719jjk	Ecowerks	12315	3031	124125		2,800	
TC	Miller	GF12731		5/7/2013	OW	005795728jjk	Ecowerks	12331	76469	124166		5,460	3 hrs demurage at ecowerks, plus broght other trl for wash
TC	Bates	GF12731		5/7/2013	Purchase soda ash	13059259	TC	12331			13059259	2,500	
TC	Miller	GF12732		5/10/2013	OW	005795727jjk	Ecowerks	12332	76470	124228		5,460	
TC	Miller	GF12732		5/10/2013	OW	005795726jjk	Newpark	12332	76470	17390		3,535	problem with ecowerks
TC	Ecowerks	GF12733		5/13/2013	OW	005795722jjk	Ecowerks	12333	124533	124533		5,460	
TC	Ecowerks	GF12733		5/14/2013	OW	005795725jjk	Ecowerks	12333	124542	124542		5,460	
TC	Ecowerks	GF12733		5/14/2013	OW	005795723jjk	Ecowerks	12333	124542	124542		5,460	
tc	Ecowerks	GF12733		5/14/2013	OW	005795693jjk	Ecowerks	12333	124542	124542		5,460	
tc	Ecowerks	GF12733		5/14/2013	OW - rejected	005795724jjk	Ecowerks	12333	124542	124542		-	Rejected
tc	Ecowerks	GF12734		5/15/2013	OW	005795692jjk	Ecowerks	12334	124674	124674		5,460	
tc	Ecowerks	GF12734		5/15/2013	OW	005795691jjk	Ecowerks	12334	124674	124674		5,460	
TC	Miller	GF12823		5/16/2013	Hydrocarbon and	TCM051615	VR	12345	76471	1021		5,000	
TC	Ecowerks	GF12735		5/17/2013	OW	005795690jjk	Ecowerks	12435	124675	124675		5,460	
TC	Ecowerks	GF12735		5/17/2013	OW	005795689jjk	Ecowerks	12435	124675	124675		5,460	
TC	Ecowerks	GF12735		5/17/2013	OW	005795688jjk	Ecowerks	12435	124675	124675		5,460	
TC	Ecowerks	GF12736		5/19/2013	OW	005795687jjk	Ecowerks	12436	124676	124676		5,000	
TC	Ecowerks	GF12736		5/19/2013	OW	005795685jjk	Ecowerks	12436	124676	124676		5,000	
TC	Ecowerks	GF12736		5/19/2013	OW	005795686jjk	Ecowerks	12436	124676	124676		5,000	
TC	Ecowerks	GF12737		5/20/2013	OW	005795684jjk	Ecowerks	12437	124677	124677		5,460	
TC	Ecowerks	GF12737		5/20/2013	OW	005795683jjk	Ecowerks	12437	124677	124677		5,460	
TC	Ecowerks	GF12737		5/20/2013	OW	005795682jjk	Ecowerks	12437	124677	124677		5,460	
TC	Miller	GF12738		5/22/2013	Chloroform water	005795670jjk	Lonestar	12338	76473	1567		5,460	
TC	Miller	GF12738		5/23/2013	Chloroform water	006100942fle	Lonestar	12338	76473	1568		5,450	
TC	Miller	GF12738		5/23/2013	Chloroform water	006100941fle	Lonestar	12338	76473	1568		5,200	
TC	Miller	GF12738		5/24/2013	Chloroform water	006100943fle	Lonestar	12338	76473	1568		2,520	
TC	Ecowerks	GF12822		5/24/2013	OW	005795632jjk	Ecowerks	12339	124678	124678		5,460	
TC	Miller	GF12739		5/28/2013	OW	005795633jjk	Ecowerks	12340	76474	124404		5,460	
TC	Miller	GF12739		5/28/2013	OW	005795634jjk	Ecowerks	12340	76474	124404		5,460	
TC	Miller	GF12739		5/31/2013	OW	005795635jjk	Ecowerks	12340	76475	124465		5,460	Arrived late, may be a late charge
TC	SKS	GF12741		5/31/2013	Totes, 5 EDA, 3 BOP, 2 EG, 4 EG		VR	12342	7507				Cluster fuck on pickup. Sat load cancelled by SKS. Rescheduled memorial day cancell by tc after
TC	Ecowerks	GF12740		6/1/2013	OW, water blanket	005795639jjk	Ecowerks	12341	124682	124682		5,460	first truck at 7, second truck at 8....11 before first load
TC	Ecowerks	GF12740		6/1/2013	OW, water blanket	005795637jjk	Ecowerks	12341	124682	124682		5,460	

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TC	TCB	GF14288		5/4/2014	OW	002333818gbf	Ecowerks	12891	14-1561	128149		5,000	Guys at ecowerks were told to be there at 9. TCB didn't show up until 1:30.
TC	TCB	GF14288		5/4/2014	OW	002333820gbf	Ecowerks	12891	14-1561	128149		5,000	
TC	Ecowerks	GF14288		5/5/2014	OW	002333821gbf	Ecowerks	12891	128126	128126	128126	5,000	
TC	Ecowerks	GF14288		5/5/2014	OW	002333822gbf	Ecowerks	12891	128126	128126	128126	5,000	
TC	Ecowerks	GF14288		5/5/2014	OW	002333823gbf	Ecowerks	12891	128126	128126	128126	5,000	
TC	TCB	GF14289		5/6/2014	OW with DEA	002333824gbf	Newpark	12899	14-1562	19786		5,400	
TC	TCB	GF14289		5/6/2014	OW with DEA	002333826gbf	Newpark	12899	14-1562	19786		5,400	
TC	Ecowerks	GF14290		5/8/2014	OW	002333827gbf	Ecowerks	12892	128180	128180	128180	5,000	
TC	Ecowerks	GF14290		5/8/2014	OW	002333828gbf	Ecowerks	12892	128180	128180	128180	5,000	
TC	Ecowerks	GF14290		5/9/2014	OW	002333829gbf	Ecowerks	12892	128181	128181	128181	5,000	
TC	Ecowerks	GF14290		5/9/2014	OW	002333830gbf	Ecowerks	12892	128181	128181	128181	5,000	
TC	Ecowerks	GF14291		5/12/2014	OW	002333831gbf	Ecowerks	12900	128198	128198	128198	5,000	
TC	Ecowerks	GF14291		5/12/2014	OW	002333832gbf	Ecowerks	12900	128198	128198	128198	5,000	
TC	Ecowerks	GF14291		5/12/2014	OW	002333833gbf	Ecowerks	12900	128198	128198	128198	5,000	
TC	Ecowerks	GF14292		5/14/2014	OW	002333834gbf	Ecowerks	12905	128221	128221	128221	5,000	
TC	Ecowerks	GF14292		5/14/2014	OW	002333835gbf	Ecowerks	12905	128221	128221	128221	5,000	
TC	Ecowerks	GF14292		5/15/2014	OW	002333836gbf	Ecowerks	12905	128222	128222	128222	5,000	
TC	Ecowerks	GF14292		5/15/2014	OW	002333837gbf	Ecowerks	12905	128222	128222	128222	5,000	
TC	Ecowerks	GF14292		5/16/2014	OW	002333838gbf	Ecowerks	12905	128246	128246	128246	5,000	
TC	Ecowerks	GF14292		5/16/2014	OW	002333839gbf	Ecowerks	12905	128246	128246	128246	5,000	
TC	TCB	GF14406		5/17/2014	hydrocarbon and water 265 water	TCM051714	VR	12920	14-1622			5,000	
TC	TCB	GF14407		5/19/2014	Hydrocarbon from 265	TCM051914	VR	12921	14-1622			3,000	#1 tank. Delivered 5/19. BSW 42%, 5K gal, CL (less than 300)
TC	TCB	GF14710		5/21/2014	TCE wash water	002332856gbf	Texas Molecu	12910	14-1652	239435		1,750	
TC	Ecowerks	GF14408		5/23/2014	OW	002333841gbf	Ecowerks	12908	128346	128346	128346	5,000	
TC	Ecowerks	GF14408		5/23/2014	OW	002333843gbf	Ecowerks	12908	128346	128346	128346	5,000	
TC	Ecowerks	GF14408		5/27/2014	OW	001333844gbf	Ecowerks	12908	128347	128347	128347	5,000	
TC	Ecowerks	GF14408		5/27/2014	OW	002333845gbf	Ecowerks	12908	128347	128347	128347	5,000	
TC	Ecowerks	GF14408		5/29/2014	OW	002333847gbf	Ecowerks	12908	128372	128372	128372	5,000	
TC	Ecowerks	GF14408		5/29/2014	OW	002333848gbf	Ecowerks	12908	128372	128372	128372	5,000	
TC	TCB	GF14555		5/30/2014	OW with DEA	002333849gbf	Newpark	12928	14-1591	19920		4,800	
TC	Ecowerks	GF14409		6/2/2014	OW	002333850gbf	Ecowerks	12914	128415	128415	128415	5,000	
TC	Ecowerks	GF14409		6/2/2014	OW	002333851gbf	Ecowerks	12914	128415	128415	128415	5,000	
TC	Ecowerks	GF14409		6/2/2014	OW	002333852gbf	Ecowerks	12914	128415	128415	128415	5,000	
TC	Ecowerks	GF14409		6/2/2014	OW	002333853gbf	Ecowerks	12914	128415	128415	128415	5,000	
TC	Ecowerks	GF14410		6/3/2014	OW	002333854gbf	Ecowerks	12919	128442	128442	128442	5,000	
TC	Ecowerks	GF14410		6/3/2014	OW	002333855gbf	Ecowerks	12919	128442	128442	128442	5,000	
TC	SKS	GF14556		6/5/2014	3 TCE, 3 Perc	002332862gbf / 002332863gbf	Tradebe	12931	10389	4411012174 / 4411013234		6	
TC	Ecowerks	GF14411		6/5/2014	OW	002333856gbf	Ecowerks	12926	128443	128443	128443	5,000	
TC	Ecowerks	GF14411		6/5/2014	OW	002333857gbf	Ecowerks	12926	128443	128443	128443	5,000	
TC	Ecowerks	GF14557		6/6/2014	OW	002333858gbf	Ecowerks	12927	128457	128457	128457	5,000	
TC	Ecowerks	GF14557		6/6/2014	OW	002333859gbf	Ecowerks	12927	128457	128457	128457	5,000	
TC	Ecowerks	GF14558		6/9/2014	OW	002333860gbf	Ecowerks	12937	128471	128471	128471	5,000	
TC	TCB	GF14711		6/10/2014	hydrocarbon to VR	TCM060914	VR	12979	14-1598			4,794	BSW 6%. Chlorides: almost 0%. Too much heel in trailer. Drop trailer and work it next day to get down to 5 or 6 inches.

Tubal Cain Gas Free Services
Port Arthur, Texas
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custom	Trans/vendor	PO	Project	Date	Job	Manifest	facility	Invoice	FRT Bill	Disp bill	Other invoice	Gallons/to	Notes
TC	Ecowerks	GF14558		6/11/2014	OW	002333862gbf	Ecowerks	12937	128489	128489	128489	5,000	
TC	Ecowerks	GF14558		6/11/2014	OW	002333863gbf	Ecowerks	12937	128489	128489	128489	5,000	
TC	Ecowerks	GF14559		6/13/2014	OW	002333864gbf	Ecowerks	12942	128537	128537	128537	5,000	
TC	Ecowerks	GF14559		6/13/2014	OW	002333865gbf	Ecowerks	12942	128537	128537	128537	5,000	
TC	Ecowerks	GF14559		6/13/2014	OW	002333866gbf	Ecowerks	12942	128537	128537	128537	5,000	
TC	Bealine	GF14956		6/17/2014	caustic	TCM061714	GCWDA	13038			2652	5,300	driver was originally sent to baytown but should have gone to TC first. Error is on Tidal. Bill this on the following day...cost.
TC	Ecowerks	GF14560		6/18/2014	OW	002333867gbf	Ecowerks	12953	128567	128567	128567	5,000	
TC	Ecowerks	GF14560		6/18/2014	OW	002333868gbf	Ecowerks	12953	128567	128567	128567	5,000	
TC	Miller	GF14562		6/19/2014	OW	002333870gbf	Ecowerks	12959	76998	128624		5,000	Some hours on Miller invoice need to be rebilled to TCB. Note from Rodney @ Miller: One truck hauling two loads of water to ecowerks. One truck on crude. At 12 noon water truck is setting with load on back side of overturn truck and trailer. Crude truck dumping his load at this time and he hurry's over to site and vacuum crude to his truck. So from noon on it was delays due to truck over turn. Rebill 7 hours to TCB.
TC	Ecowerks	GF14561		6/23/2014	OW	002333873gbf	Ecowerks	12956	128594	128594	128594	5,000	
TC	Ecowerks	GF14561		6/23/2014	OW	002333874gbf	Ecowerks	12956	128594	128594	128594	5,000	
TC	Ecowerks	GF14561		6/23/2014	OW	002333875gbf	Ecowerks	12956	128594	128594	128594	5,000	
TC	Miller	GF14562		6/23/2014	OW - rejected	002333869gbf	Ecowerks	12959	76998	128624		-	rejected load from 6/20
TC	Ecowerks	GF14561		6/23/2014	OW - rejected	002333876gbf	Ecowerks	12956	128594	128594	128594	5,000	rejected for high pH
TC	Ecowerks	GF14562		6/24/2014	OW	002333878gbf	Ecowerks	12959	128625	128625	128625	5,000	
TC	Miller	GF14957		6/24/2014	TCE wash water - rejected	002333880gbf	Texas Molecu	13043	76998	240258			Load rejected. 25% organics. One of the totes labled as TCE ww must have been TCE.
TC	SKS	GF14713		6/25/2014	4 TCE (one added from reject load above)	002332865gbf	Tradebe	13002	10516	4.411E+09		4	
TC	Ecowerks	GF14563		6/25/2014	OW	002333882gbf	Ecowerks	12961	128636	128636	128636	5,000	
TC	Ecowerks	GF14563		6/25/2014	OW	002333883gbf	Ecowerks	12961	128636	128636	128636	5,000	
TC	Ecowerks	GF14563		6/25/2014	OW	002333884gbf	Ecowerks	12961	128636	128636	128636	5,000	
TC	Miller	GF14712		6/25/2014	TCE wash water	002333881gbf	Texas Molecu	12969	76998	240319	128691	814	Drained 1.5 totes from bottom. Gravity only. Sent load back the tex mol.
TC	Bealine	GF14704	TC vac boxe	6/27/2014	vac box solids	002333887gbf	US ecology	12992	BE196159	T94945		11.54	
TC	Bealine	GF14704	TC vac boxe	6/27/2014	vac box solids	002333886gbf	US ecology	12992	BE196159	T94945		8.19	560 per ton plus 1700 for freight. Freight cost is 1715 per load with 80/hr for demurage over 3 hrs.
TC	Ecowerks	GF14564		6/30/2014	OW	002333888gbf	Ecowerks	12966	128714	128714	128714	5,000	
TC	Ecowerks	GF14564		6/30/2014	OW	002333891gbf	Ecowerks	12966	128714	128714	128714	5,000	
TC	Ecowerks	GF14564		6/30/2014	OW - rejected	002333885gbf	Ecowerks	12966	128714	128714	128714	-	rejected for high pH
TC	Bealine	GF14704	TC vac boxe	6/30/2014	vac box solids	002333890gbf	US ecology	12992	BE196159	T94945		6.70	

custom	Trans/vendor	PO	Project	Date	Job	Manifest	facility	Invoice	FRT Bill	Disp bill	Other invoice	Gallons/to	Notes
TC	Ecowerks	GF14728		7/28/2014	OW	002333019gbf	Ecowerks	13009	128983	128983	128983	5,000	
TC	Ecowerks	GF14728		7/28/2014	OW - rejected	002333020gbf	Ecowerks	13009	128983	128983	128983	-	rejected due to solids
TC	Ecowerks	GF14728		7/29/2014	OW	002333021gbf	Ecowerks	13009	128983	128983	128983	5,000	
TC	Ecowerks	GF14959		7/30/2014	OW	002333023gbf	Ecowerks	13012	128985	128985	128985	5,000	
TC	TCB			7/31/2014	hydrocarbon to VR	TCM073114-1	VR		14-1671			5,040	bsw 40% (39 water), .9138 sg , cl around 800 but inflated by water. Flash between 95 and 104
TC	Ecowerks	GF14959		7/31/2014	OW	002333024gbf	Ecowerks	13012	128995	128995	128995	5,000	
TC	Ecowerks	GF14959		7/31/2014	OW	002333025gbf	Ecowerks	13012	128995	128995	128995	5,000	
TC	Ecowerks	GF14961		8/1/2014	OW	002333028gbf	Ecowerks	13013	129029	129029	129029	5,000	
TC	Ecowerks	GF14961		8/1/2014	OW - rejected	002333026gbf	Ecowerks	13013	129029	129029	129029	-	
TC	Ecowerks	GF14961		8/1/2014	OW - rejected	002333027gbf	Ecowerks	13013	129029	129029	129029	-	
TC	Ecowerks	GF14961		8/4/2014	OW	002333029gbf	Ecowerks	13013	129041	129041	129041	5,000	
TC	Ecowerks	GF14961		8/4/2014	OW	002333030gbf	Ecowerks	13013	129041	129041	129041	5,000	
TC	Ecowerks	GF14962		8/6/2014	OW	002333031gbf	Ecowerks	13015	129066	129066	129066	5,000	
TC	Ecowerks	GF14962		8/6/2014	OW	002333032gbf	Ecowerks	13015	129066	129066	129066	5,000	
TC	Ecowerks	GF14962		8/6/2014	OW	002333033gbf	Ecowerks	13015	129066	129066	129066	5,000	
TC	Ecowerks	GF14962		8/6/2014	OW	002333034gbf	Ecowerks	13015	129066	129066	129066	5,000	
TC	TCB			8/9/2014	hydrocarbon to VR	TCM080914	VR		14-1659			5,000	truck issue - truck pump broken
TC	Ecowerks			8/11/2014	OW	002333035gbf	Ecowerks		129110	129110	129110	5,000	
TC	Ecowerks			8/11/2014	OW	002333036gbf	Ecowerks		129110	129110	129110	5,000	
TC	Ecowerks			8/11/2014	OW	002333037gbf	Ecowerks		129110	129110	129110	5,000	
TC	Ecowerks	GF14963		8/13/2014	OW	002333038GBF	Ecowerks	13018	129145	129145	129145	5,000	
TC	Ecowerks	GF14963		8/13/2014	OW	002333039GBF	Ecowerks	13018	129145	129145	129145	5,000	
TC	Ecowerks	GF14963		8/13/2014	OW	002333055GBF	Ecowerks	13018	129145	129145	129145	5,000	
TC	Ecowerks	GF14964		8/14/2014	OW	002333052gbf	Ecowerks	13040	129146	129146		5,000	
TC	Ecowerks	GF14964		8/14/2014	OW	002333053gbf	Ecowerks	13040	129146	129146		5,000	
TC	TCB	GF14965		8/14/2014	TCE wash water	002333054gbf	Texas Molecul	13044	14-1679	241735		1,500	10am. Didn't leave until 2. TCB driver had a wreck. Deal with that. Take TCE to TM late afternoon or tonight. TCE wasn't decanted.
TC	BPS	GF14966		8/14/2014	Tote pickup: 2 TCE to 10 day, 3 MEG & 4 PG to baytown. PG	002332782gbf	Tradebe	13055	2735	4.411E+09		2	8am. See email from Javier on 8/14. Subject line: Tubal Cain shipment 8/14/14. lots of trucks loading at TC. Forklift availability. Truck departed first time at 10am then turned around to pick up propylene glycol. TCE delivered 8/25
TC	Ecowerks	GF14967		8/15/2014	OW	002333050gbf	Ecowerks	13041	129242	129242	129242	5,000	
TC	Ecowerks	GF14967		8/15/2014	OW	002333051gbf	Ecowerks	13041	129242	129242	129242	5,000	
TC	Ecowerks	GF14968		8/18/2014	OW	002333040gbf	Ecowerks	13042	129168	129168	129168	5,000	
TC	Ecowerks	GF14968		8/18/2014	OW	002333041gbf	Ecowerks	13042	129168	129168	129168	5,000	
TC	Ecowerks	GF14969		8/19/2014	OW	002333049gbf	Ecowerks	13045	129183	129183		5,000	
TC	Ecowerks	GF14972		8/20/2014	OW	002333042gbf	Ecowerks	13050	129201	129201	129201	5,000	
TC	Ecowerks	GF14972		8/20/2014	OW	002333048gbf	Ecowerks	13050	129201	129201	129201	5,000	
TC	Ecowerks	GF14971		8/21/2014	OW	002333043gbf	Ecowerks	13051	129202	129202	129202	5,000	
TC	Ecowerks	GF14971		8/21/2014	OW	002333044gbf	Ecowerks	13051	129202	129202	129202	5,000	
TC	Ecowerks	GF14970	water blank	8/22/2014	OW	002333045gbf	Ecowerks	13057	129231	129231	129231	5,000	
TC	Ecowerks	GF14970	water blank	8/22/2014	OW	002333046gbf	Ecowerks	13057	129231	129231	129231	5,000	
TC	Ecowerks	GF14970	water blank	8/22/2014	OW	002333047gbf	Ecowerks	13057	129231	129231	129231	5,000	

Tubal Cain Gas Free Services
Port Arthur, Texas
TXR000080420

APPENDIX 8

"lifecycle" example of a rejected load from Ecowerks to Value Resources

(2 pages)

Page 1 – Rejected manifest

Page 2 – Bill of Lading for the same load now sent to GB Sales

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90023
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002228675 GBF

5. Generator's Name and Mailing Address: Tubal Cain Gas Free, 140 Old Nat Chase Rd, Port Arthur TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-982-5000

6. Transporter 1 Company Name: Tubal
U.S. EPA ID Number

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: Evergreen Gas Recovery, Port Arthur TX 77642
U.S. EPA ID Number
Facility's Phone: 409-722-0449

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. Non DOT Non RCRA Only Water	1	TT	3,000	gal	
	2.					
	3.					
	4.					

Rejected

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Cody Rogers
Signature
Month 10 Day 25 Year 12

16. International Shipments ☐ Import to U.S. ☐ Export from U.S.
Port of entry/exit:
Transporter signature (for exports only):
Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Michael Beaty
Signature: Michael Beaty
Month 10 Day 29 Year 12

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

TRANSPORTER'S COPY

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

THIS SHIPPING ORDER must be legibly filled in, in Ink, in Indelible Pencil, or in Carbon, and retained by the Agent.

Shipper's No. 90233

Carrier's Name: ES&H

Carrier's No.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

GB Sales (Date) 10/31/13 FROM Tubal Cain

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO GB Sales Tubal Cain

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination GB Sales Street 6450 N. Main City Baytown County State Texas Zip

Route Delivery Address★

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier ES&H Car or Vehicle Initials and No.

Collect on Delivery $ And Remit to

Street City State

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Flammable liquid, NOS, 1991, PG3	2200 GAL	3	

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignee shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignee.)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification."
†Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE.—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

Shipper, Per

Permanent post-office address of shipper,

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

Actually UR used to Frey. UR recovered oil residual (water)

From rejected manifest 00222 8675 GBF

10-29-13

Harbor - soybean barge → soybean oil → water tank → emulsion pulls HC oil into water. → UR recovered oil + sent water off site for disposal. or could be start HC + water

APPENDIX 9

Triethylamine (U404) metered into spent wash water sent to Ecowerks for disposal

(6 pages)

Page 1 – Page from Tubal Cain internal spreadsheet indicating the load went to New Park with two totes of "DEA"

Pages 2-6 Manifests showing disposal of varying amounts of TEA as "non RCRA; non DOT" waste or referred to in Page 1

	Trans/vendor	PO	Project	Date	Job	Manifest	facility	Invoice	FRT Bill	Disp bill	Other invoice	Gallons/tc	Notes
	Ecowerks	GF13810		1/14/2014	OW	002333664gbf	Ecowerks	12714	127021	127021	127021	5,000	
TC	Ecowerks	GF13810		1/14/2014	OW	002333665gbf	Ecowerks	12714	127021	127021	127021	5,000	
TC	Ecowerks	GF13810		1/14/2014	OW	002333667gbf	Ecowerks	12714	127021	127021	127021	5,000	
TC	TCB	GF13810		1/14/2014	OW	002333666gbf	Ecowerks	12714	14-1453	127021	127021	5,000	
TC	Ecowerks	GF13811		1/16/2014	OW	002333668gbf	Ecowerks	12715	127066	127066	127066	5,000	
TC	Ecowerks	GF13811		1/16/2014	OW	002333669gbf	Ecowerks	12715	127066	127066	127066	5,000	
TC	Ecowerks	GF13811		1/16/2014	OW	002333671gbf	Ecowerks	12715	127066	127066	127066	5,000	
TC	Ecowerks	GF13811		1/17/2014	OW	002333672gbf	Ecowerks	12715	127066	127066	127066	5,000	
TC	Ecowerks	GF13811		1/17/2014	OW	002333673gbf	Ecowerks	12715	127066	127066	127066	5,000	
TC	Ecowerks	GF13811		1/17/2014	OW	002333674gbf	Ecowerks	12715	127066	127066	127066	5,000	
TC	TCB	GF13812	TC Caustic	1/20/2014	Caustic, filter at VR then GCWDA	TCM012014	GCWDA	12755	14-1455		14-1455	4,500	
TC	Ecowerks	GF13813		1/20/2014	OW	002333676gbf	Ecowerks	12721	127078	127078	127078	5,000	
TC	Ecowerks	GF13813		1/20/2014	OW	002333675gbf	Ecowerks	12721	127078	127078	127078	5,000	
TC	Ecowerks	GF13813		1/20/2014	OW	002333677gbf	Ecowerks	12721	127078	127078	127078	5,000	
TC	TCB	GF13814		1/22/2014	OW	002333678gbf	Ecowerks	12730	14-1460	127124		5,000	
TC	TCB	GF13814		1/22/2014	OW	002333679gbf	Ecowerks	12730	14-1460	127124		5,000	
TC	TCB	GF13814		1/23/2014	OW	002333680gbf	Ecowerks	12730	14-1462	127124		5,000	Driver came back to get water without authorizaton. Only pay for time from tc to ecowerks thru
TC	TCB	GF13814		1/27/2014	OW	002333681gbf	Ecowerks	12730	14-1463	127124		5,000	
TC	TCB	GF13814		1/27/2014	OW	002333682gbf	Ecowerks	12730	14-1463	127124		5,000	
TC	Ecowerks	GF13815		1/30/2014	OW	002333683gbf	ecowerks	12740	127216	127216	127216	5,000	
TC	Ecowerks	GF13815		1/30/2014	OW	002333684gbf	ecowerks	12740	127216	127216	127216	5,000	
TC	Ecowerks	GF13815		1/30/2014	OW - rejected	002333685gbf	ecowerks	12740	127216	127216	127216	5,000	Rejected for flash around 119
TC	Ecowerks	GF13815		1/31/2014	OW	002333688gbf	Ecowerks	12740	127216	127216	127216	5,000	Driver got there late - around 230 - took forever messing around to see his weight. They did get two loads but second would not have arrived at ecowerks unitl after 5. Ro indicated no later charges.
TC	Ecowerks	GF13815		1/31/2014	OW	002333687gbf	Ecowerks	12740	127216	127216	127216	5,000	
TC	SKS	GF13816		1/31/2014	Totes (2 vam, 1 acrylic acid, 6 dirty perc) rtn caustic and feric to yard	002333686gbf	Tradebe	12736	9570	4.411E+09			
TC	Ecowerks	GF14071		2/3/2014	OW	002333691gbf	Ecowerks	12769	127394	127394	127394	5,000	Charity said VacServ made these 2
TC	Ecowerks	GF13819		2/3/2014	OW with TEA	002333690gbf	Newpark	12763	127394	19325	127394	4,908	Load went to Newpark w/2 totes of DEA. Second load redirected to ecowerks because ecowerks does not have transport number.
TC	Ecowerks	GF13817		2/3/2014	tank bottoms from water tank	002333689gbf	US ecology	12762	127221	T90177	127221	12	Trip rate $1500. Includes 3 hour of load/unload time. Robstown. Job Delayed due to weather. Reset for Monday 2/3. Washout VB0725023.
TC	TCB	GF13818		2/5/2014	OW	002333692gbf	Ecowerks	12757	14-1479	127195		5,000	
TC	TCB	GF13819		2/5/2014	OW with TEA	002333694gbf	Newpark	12763	14-1479	19325		4,957	
TC	SKS	GF14070	Higman	2/7/2014	boxes from higman barge	1 Kleave rust box	VR	12776	9620			6,000	
TC	TCB	GF13818		2/7/2014	OW	002333695gbf	Ecowerks	12757	14-1481	127259	127259	5,000	

TXR000080426

Tubal Cain Gas Free Services
Port Arthur, Texas

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of 1
3. Emergency Response Phone:
4. Manifest Tracking Number: 002333690 GBF

5. Generator's Name and Mailing Address: Tubal Cain Gas Free, 8737 Old Yacht Club Rd, Port Arthur, Tx 77642

Generator's Site Address (if different than mailing address):

Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: Ecowater — U.S. EPA ID Number: 81604

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Waste Management, New Park Ind., 2400 Gilbert Rd, Winnie, TX 77665, 409-724-3119 — U.S. EPA ID Number: 39098

Facility's Phone:

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. Non RCRA Barge wash water Non DOT (w/gasoline residue)	1	TT	5000	G	D018	D035	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information: 0614131702BH

4908 gal

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Joshua L McDonald — Signature: [signature] — Month 2 Day 3 Year 14

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Gerald Edwards — Signature: [signature] — Month 2 Day 3 Year 14

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H134 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a

Printed/Typed Name: Vicki Heffner — Signature: [signature] — Month 2 Day 18 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002333691 GBF

5. Generator's Name and Mailing Address: Tubal-Cain Gas Free, 8737 Old Yacht Club Rd, Port Arthur, TX 77642
Generator's Phone: 409-962-8800
Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name — U.S. EPA ID Number

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Ecoworks, 6200 Procter St. Ext., Port Arthur, TX 77642
U.S. EPA ID Number: TXD 012287
Facility's Phone: 409-962-6469

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. Non DOT Barge Wash water NON NCRA	1	TT	5000	G	D008	D005	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Joshua L McDonald — Signature: [signature] — Month 2 Day 3 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Gerald Edwards — Signature: [signature] — Month 2 Day 3 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: R. DeLos Santos — Signature: [signature] — Month 2 Day 3 Year 14

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002333692 GBF

5. Generator's Name and Mailing Address: Tubal Cain Gas Free, 8737 Old Yacht Club Rd, Port Arthur, TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: ~~Ecoworks~~ TCB
U.S. EPA ID Number: TXR0000 80496

7. Transporter 2 Company Name
U.S. EPA ID Number: TXR000079853

8. Designated Facility Name and Site Address: Ecoworks, 6200 Proctor St. Ext., Port Arthur, TX 77642
U.S. EPA ID Number: TX0112 887
Facility's Phone: 409-962-6469

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. NON DOT NON RCRA Barge Wash water	1	TT	5000	G			
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Joshua L Mc Donald
Signature:
Month 2 Day 5 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Bill PARKS
Signature:
Month 2 Day 5 Year 14
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: CHARITY SCHULTZ
Signature:
Month 02 Day 05 Year 14

GENERATOR — INTL — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone: 409-962-8800
4. Manifest Tracking Number: 002333694 GBF

5. Generator's Name and Mailing Address: Tubal Cain - Gas Free, 8737 Old Yacht Club Rd., Port Arthur, TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: ACR
U.S. EPA ID Number: TXR 000 80496

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: New Pork Industrial Environmental Services, 36400 Wilber Rd., Winnie, TX 77665
U.S. EPA ID Number: TX 34098
Facility's Phone: 409-794-3189

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. NON DOT Barge Wash water/FEA (about 500 gallons) NON RCRA "Triethanolamine"	1	TT	5000	G	D038	D05	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
061432702BH
495 Nape

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator/Offeror's Printed/Typed Name: Connor Trahan
Signature:
Month 2 Day 5 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Bill Baker
Signature:
Month 2 Day 5 Year 14
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
H134 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Vicki Hoffmann
Signature:
Month Day Year 2 5 14

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-09) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone: 409 962 8800
4. Manifest Tracking Number: 002333696 GBF

5. Generator's Name and Mailing Address: Tubal Cain Marine Services
8737 Old Vacuum Club Rd
Port Arthur, TX 77642

Generator's Site Address (if different than mailing address)

Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: TCB
U.S. EPA ID Number: ~~[illegible]~~ 908134

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: WCW Park ~~Industrial~~ Environmental Svcs
86400 Wilber Rd.
Winnie, TX 77642

U.S. EPA ID Number: TXD 990988

Facility's Phone: 409-794-3119

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. NON DOT, NON RCRA, "Barge Wash Water" 75 gallons "TEA" Triethanolamine	1	TP	5000 est	G	D008	D035	I
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information:
Profile # 0614131702 BH

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Conner Tabor
Signature:
Month 12 Day 17 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: TCB Enviro
Signature:
Month 12 Day 17 Year 14

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H134 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Vicki Hoffmeier
Signature:
Month 12 Day 22 Year 14

GENERATOR

TRANSPORTER INTL

DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Tubal Cain Gas Free
Port Arthur, Texas TXR000080426

APPENDIX 10

Wastewater profile provided to Ecowerks

(6 pages)

081515206 7BH TXR000080426 5

GENERATOR KNOWLEDGE DOCUMENTATION

GENERATOR: Tubal-Cain Marine Services
Facility I.D. #: 90733
Waste Name: Barge wash water and water blanket
State Waste Code #: 00082051

Detailed Description of Waste Generation Process:
Product is stripped from barge (including sumps) and kept in separate storage. Barge container is then washed and rinsed. Wash and rinse water is then pumped into storage container used exclusively for that purpose. Wash and rinse water is then pumped from container to tank truck for movement to disposal site.

Laboratory analysis of the hazardous waste characteristics, listed below, was not perfomed based upon the following generator knowledge:

TOXICITY

TCLP/Total Metals: See analysis

TCLP/Total Volatile Organics: See analysis

TCLP/Total Semivolatile Organics: See analysis

TCLP/Total Herbicides and Pecticides
No RCRA regulated Herbicides and/or Pesticides are handled, managed or used at this facility nor are they introduced into the waste generation process. Therefore, there are none in the waste.

REACTIVITY: See analysis

CORROSIVITY: See analysis

IGNITABILITY: See analysis

Signature:
Title: Joshua McDonald
Date: Product Control Coordinator
Employer: Tubal-Cain Marine Services

TXR000080426

081515206 7BH

Laboratory Analysis Report

Total Number of Pages: 14

Job ID : 14071541

10100 East Freeway, Suite 100, Houston, TX 77029 tel: 713-453-6060, fax: 713-453-6091, http://www.ablabs.com

Client Project Name :
TCM Water Tank

Report To :	Client Name:	GB Sales & Consulting	P.O.#.:
	Attn:	Greg Bowman	Sample Collected By:
	Client Address:	14303 Hartshill Drive	Date Collected: 07/31/14
	City, State, Zip:	Houston, Texas, 77044	

A&B Labs has analyzed the following samples...

Client Sample ID	Matrix	A&B Sample ID
TC Water	Water	14071541.01

Alisha Hughes

Released By: Alisha Hughes
Title: Project Manager
Date: 8/6/2014

This Laboratory is NELAP (T104704213-14-11) accredited. Effective: 04/01/2014; Expires: 03/31/2015
Scope: Non-Potable Water, Drinking Water, Air, Solid, Hazardous Waste

I am the laboratory manager, or his/her designee, and I am responsible for the release of this data package. This laboratory data package has been reviewed and is complete and technically compliant with the requirements of the methods used, except where noted in the attached exception reports. I affirm, to the best of my knowledge that all problems/anomalies observed by this laboratory (and if applicable, any and all laboratories subcontracted through this laboratory) that might affect the quality of the data, have been identified in the Laboratory Review Checklist, and that no information or data have been knowingly withheld that would affect the quality of the data.

This report cannot be reproduced, except in full, without prior written permission of A&B Labs. Results shown relate only to the items tested. Samples are assumed to be in acceptable condition unless otherwise noted. Blank correction is not made unless otherwise noted. Air concentrations reported are based on field sampling information provided by client. Soil samples are reported on a wet weight basis unless otherwise noted. Uncertainty estimates are available on request.

Date Received : 07/31/2014 14:28

081515206 7BA TXR000080426 3

Supplemental Waste Information (Page 1 of 2)

For Barge wash water and water blanket waste stream from Tubal-Cain Marine Services (SWR#90733 and TXC# 00082051)

Components

Hydrocarbons and chemical materials: (0-5%)

- Oil
- Kerosene
- 6 Oil
- VGO
- Naphtha
- Crude Oil
- Acrylates
- Styrene
- Glycol
- Glycol ethers
- Amines
- Organic acids

FOOD/FEED based materials (0-5%)

- Sugars
- Fats
- Oils

081515 2067BH

Salts	0-1%
NAOH/H2SO4	0-.1%
Alcohols	0-3%

081515206TBH TXR000080426

LABORATORY TEST RESULTS

Job ID : 14071541

Date 8/6/2014

Client Name: GB Sales & Consulting
Project Name: TCM Water Tank

Attn: Greg Bowman

Client Sample ID: TC Water
Date Collected: 07/31/14
Time Collected: 14:30
Other Information:

Job Sample ID: 14071541.01
Sample Matrix Water

Test Method	Parameter/Test Description	Result	Units	DF	Rpt Limit	Reg Limit	Q	Date Time	Analyst
SW-846 1010A	Ignitability (Flash Point)								
	Ignitability	>150	°F	1				08/04/14 08:00	MAM
SW-846 7.3	Reactive Cyanide								
	Reactive Cyanide[1]	BRL	mg/L	1	25			08/04/14 14:00	SR
SW-846 7.3	Reactive Sulfide								
	Reactive Sulfide[1]	BRL	mg/L	1	25			08/04/14 15:10	SR
SW-846 8260C	TCLP VOC								
	1,1-Dichloroethylene	BRL	mg/L	10	1.3	0.6		08/02/14 05:33	BPC
	1,2-Dichloroethane	BRL	mg/L	10	1.3	0.5		08/02/14 05:33	BPC
	1,4-Dichlorobenzene	BRL	mg/L	10	1.5	7.5		08/02/14 05:33	BPC
	Benzene	BRL	mg/L	10	1.3	0.5		08/02/14 05:33	BPC
	Carbon tetrachloride	BRL	mg/L	10	1.3	0.5		08/02/14 05:33	BPC
	Chlorobenzene	BRL	mg/L	10	1.5	70		08/02/14 05:33	BPC
	Chloroform	BRL	mg/L	10	1.3	6		08/02/14 05:33	BPC
	MEK	BRL	mg/L	10	1.3	200		08/02/14 05:33	BPC
	Tetrachloroethylene	BRL	mg/L	10	1.3	0.7		08/02/14 05:33	BPC
	Trichloroethylene	BRL	mg/L	10	1.3	0.5		08/02/14 05:33	BPC
	Vinyl Chloride	BRL	mg/L	10	1.3	0.2		08/02/14 05:33	BPC
	1,2-Dichloroethane-d4(surr)	113	%	10	70-130			08/02/14 05:33	BPC
	Dibromofluoromethane(surr)	110	%	10	70-130			08/02/14 05:33	BPC
	p-Bromofluorobenzene(surr)	124	%	10	70-130			08/02/14 05:33	BPC
	Toluene-d8(surr)	98	%	10	70-130			08/02/14 05:33	BPC
SW-846 8270D	TCLP Semivolatiles								
	1,4-Dichlorobenzene	BRL	mg/L	2	0.1	7.5	D1	08/05/14 18:30	PNS
	2,4,5-Trichlorophenol	BRL	mg/L	2	0.1	400		08/05/14 18:30	PNS
	2,4,6-Trichlorophenol	BRL	mg/L	2	0.1	2		08/05/14 18:30	PNS
	2,4-Dinitrotoluene	BRL	mg/L	2	0.1	0.13		08/05/14 18:30	PNS
	2-Methylphenol	0.249	mg/L	2	0.1	200		08/05/14 18:30	PNS
	3- & 4-Methylphenols	0.587	mg/L	2	0.2	200		08/05/14 18:30	PNS
	Hexachlorobenzene	BRL	mg/L	2	0.1	0.13	V1	08/05/14 18:30	PNS
	Hexachlorobutadiene	BRL	mg/L	2	0.1	0.5		08/05/14 18:30	PNS
	Hexachloroethane	BRL	mg/L	2	0.1	3		08/05/14 18:30	PNS
	Nitrobenzene	BRL	mg/L	2	0.1	2		08/05/14 18:30	PNS
	Pentachlorophenol	BRL	mg/L	2	0.5	100		08/05/14 18:30	PNS
	Pyridine	BRL	mg/L	2	0.1	5		08/05/14 18:30	PNS
	2,4,6-Tribromophenol(surr)	86	%	2	10-120			08/05/14 18:30	PNS
	2-Fluorobiphenyl(surr)	73.1	%	2	30-115			08/05/14 18:30	PNS
	2-Fluorophenol(surr)	74.8	%	2	15-111			08/05/14 18:30	PNS
	Nitrobenzene-d5(surr)	72.8	%	2	20-120			08/05/14 18:30	PNS

G81515 2067BH TXR000080426

LABORATORY TEST RESULTS

Job ID : 14071541

Date 8/6/2014

Client Name: GB Sales & Consulting
Project Name: TCM Water Tank

Attn: Greg Bowman

Client Sample ID: TC Water
Date Collected: 07/31/14
Time Collected: 14:30
Other Information:

Job Sample ID: 14071541.01
Sample Matrix Water

Test Method	Parameter/Test Description	Result	Units	DF	Rpt Limit	Reg Limit	Q	Date Time	Analyst
SW-846 8270D	TCLP Semivolatiles								
	Phenol-d6(surr)	79	%	2	15-120			08/05/14 18:30	PNS
	p-Terphenyl-d14(surr)	63	%	2	18-137			08/05/14 18:30	PNS
SW-846 9040C	Corrosivity, pH								
	pH	10.02	s.u.				H3	08/01/14 09:40	AJ
	Temperature when read, °C[1]	21.4	s.u.				H3	08/01/14 09:40	AJ

[1]-Parameter not available for accreditation

APPENDIX 11

"lifecycle" example of nap caustic treatment

(27 pages)

Page 1 – email from G. Bowman to C. Durio describing planned treatment

Pages 2-12 – Pre-treatment laboratory test results

Pages 13-15 – Waste profile indicating the material is hazardous waste

Pages 16-17 - G. Bowman's chart showing management of nap caustic

Pages 18-19 – Modified Class 1 profile for sludge derived from treating nap caustic

Page 20 - Analytical for treated water removed from nap caustic indicating that the wastewater is non-hazardous

Pages 21-26 – Manifests for disposal of nap caustic sludge as non-hazardous waste

Page 27 – Records showing some nap caustic in storage

claim redacted 10-1-14
~~CBI claim~~

Cade Durio

From: greg B <gallenb1963@gmail.com>
Sent: Monday, November 11, 2013 11:52 AM
To: Cade Durio
Cc: Matt Bowman; Jenelle Honey
Subject: Project plan for nap caustic vacuum boxes

1. We will add some bleach to the boxes to help dampen the odor as this could cause problems with disposal sites even if all other parameters are acceptable.

2, Once this is done, we will add a weak acidic solution to neutralize the PH and insure the box is properly mixed. We will use nitrogen to facilitate the mixing.

3. Once the box has settled, we will remove the liquid phase and take this to texas molecular for disposal as haz water (D001). I am sending a profile for your signature. Also, we will need to get your folks to add a waste to your NOR at TCEQ.

4. Remaining solids will be stabilized with fly ash in an open top rolloff box. Resulting box will be taken to seabreaze as class 1 under existing profile (rust and sludge).

As part of this project, we are delivering several totes of acidic solution. ALso we will have the bleach delivered on Tuesday. tentative plan to begin project on Wednesday.

--
Greg Bowman
PH: 713-419-6076
FX: 832-553-2897

LABORATORY TEST RESULTS

Job ID : 13101510

Naphthenic Caustic
Before Stabilization & Neutralization

Date 11/4/2013

Client Name: GB Sales & Consulting
Project Name: TCM Nap Caustic

Attn: Greg Bowman

Client Sample ID: TCM Nap Caustic
Date Collected: 10/31/13
Time Collected:
Other Information:

Job Sample ID: 13101510.01
Sample Matrix Sludge

Test Method	Parameter/Test Description	Result	Units	DF	Rpt Limit	Reg Limit	Q	Date Time	Analyst
SW-846 1010A	Ignitability (Flash Point)								
	Ignitability	115	°F	1				11/01/13 13:00	MAM
SW-846 6010C	TCLP Metals								
	Arsenic	BRL	mg/L	2.5	0.1	5.0	D1	11/04/13 14:30	GG
	Barium	0.47	mg/L	2.5	0.1	100.0		11/04/13 14:30	GG
	Cadmium	BRL	mg/L	2.5	0.1	1.0	D1	11/04/13 14:30	GG
	Chromium	BRL	mg/L	2.5	0.1	5.0	D1	11/04/13 14:30	GG
	Lead	BRL	mg/L	2.5	0.1	5.0	D1	11/04/13 14:30	GG
	Selenium	BRL	mg/L	2.5	0.25	1.0	D1	11/04/13 14:30	GG
	Silver	BRL	mg/L	2.5	0.1	5.0	D1	11/04/13 14:30	GG
SW-846 7.3	Reactive Cyanide								
	Reactive Cyanide[1]	BRL	mg/Kg	5.00	125			11/01/13 17:50	SR
SW-846 7.3	Reactive Sulfide								
	Reactive Sulfide[1]	BRL	mg/Kg	1	25			11/04/13 09:45	SR
SW-846 7470A	TCLP Mercury								
	Mercury	BRL	mg/L	4	0.002	0.2	D1	11/04/13 13:34	SS
SW-846 8270D	TCLP Semivolatiles								
	1,4-Dichlorobenzene	BRL	mg/L	10	0.5	7.5		11/04/13 16:35	YZ
	2,4,5-Trichlorophenol	BRL	mg/L	10	0.5	400		11/04/13 16:35	YZ
	2,4,6-Trichlorophenol	BRL	mg/L	10	0.5	2		11/04/13 16:35	YZ
	2,4-Dinitrotoluene	BRL	mg/L	10	0.5	0.13		11/04/13 16:35	YZ
	2-Methylphenol	BRL	mg/L	10	0.5	200		11/04/13 16:35	YZ
	3- & 4-Methylphenols	BRL	mg/L	10	1	200		11/04/13 16:35	YZ
	Hexachlorobenzene	BRL	mg/L	10	0.5	0.13		11/04/13 16:35	YZ
	Hexachlorobutadiene	BRL	mg/L	10	0.5	0.4		11/04/13 16:35	YZ
	Hexachloroethane	BRL	mg/L	10	0.5	3		11/04/13 16:35	YZ
	Nitrobenzene	BRL	mg/L	10	0.5	2		11/04/13 16:35	YZ
	Pentachlorophenol	BRL	mg/L	10	2.5	100		11/04/13 16:35	YZ
	Pyridine	BRL	mg/L	10	0.5	4		11/04/13 16:35	YZ
	2,4,6-Tribromophenol(surr)	25	%	10	10-120			11/04/13 16:35	YZ
	2-Fluorobiphenyl(surr)	42.7	%	10	30-115			11/04/13 16:35	YZ
	2-Fluorophenol(surr)	N/A	%	10	17-115		S6	11/04/13 16:35	YZ
	Nitrobenzene-d5(surr)	22	%	10	20-120			11/04/13 16:35	YZ
	Phenol-d6(surr)	4.50	%	10	15-120		S6	11/04/13 16:35	YZ
	p-Terphenyl-d14(surr)	54.3	%	10	30-140			11/04/13 16:35	YZ
SW-846 9045D	Corrosivity, pH								
	pH	12.61	s.u.					11/04/13 10:10	AJ
	Temperature when read, °C[1]	20.9	s.u.					11/04/13 10:10	AJ

[1]-Parameter not available for accreditation

QUALITY CONTROL CERTIFICATE

Job ID : 13101510 **Date :** 11/4/2013

Analysis : Ignitability (Flash Point) **Method : SW-846 1010A** **Reporting Units : °F**

QC Batch ID : Qb13110167 **Created Date :** 11/01/13 **Created By :** MMaldonado

Samples in This QC Batch : 13101510.01

QC Type: Duplicate

QC Sample ID: 13101510.01

Parameter	QCSample Result	Sample Result	Units	RPD	RPD CtrlLimit		Qual
Ignitability	115	115	°F	0	20		

QC Type: LCS and LCSD

Parameter	LCS Spk Added	LCS Result	LCS % Rec	LCSD Spk Added	LCSD Result	LCSD % Rec	RPD	RPD CtrlLimit	%Recovery CtrlLimit	Qual
Ignitability	83	85	102	83	86	104	1.2	20	75-125	

Refer to the Definition page for terms.

QUALITY CONTROL CERTIFICATE

Job ID : 13101510 **Date :** 11/4/2013

Analysis : **Corrosivity, pH** **Method :** **SW-846 9045D** **Reporting Units :** **s.u.**

QC Batch ID : Qb13110416 **Created Date :** 11/04/13 **Created By :** Ajohn

Samples in This QC Batch : 13101510.01

QC Type: Duplicate

QC Sample ID: 13101510.01

Parameter	QCSample Result	Sample Result	Units	RPD	RPD CtrlLimit		Qual
pH	12.62	12.61	s.u.	0.1	5		

QC Type: LCS and LCSD

Parameter	LCS Assigned	LCS Result		LCSD Assigned	LCSD Result		RPD	RPD CtrlLimit	Tolerance	Qual
pH	4.0	4.00							3.95-4.05	

Refer to the Definition page for terms.

QUALITY CONTROL CERTIFICATE

Job ID : 13101510 **Date :** 11/4/2013

Analysis : **Reactive Sulfide** **Method :** **SW-846 7.3** **Reporting Units :** **mg/Kg**

QC Batch ID : Qb13110424 **Created Date :** 11/01/13 **Created By :** Srani

Samples in This QC Batch : 13101510.01

Sample Preparation : PB13110416 **Prep Method :** SW-846 7.3 **Prep Date :** 11/01/13 16:00 **Prep By :** Srani

QC Type: Method Blank

Parameter	CAS #	Result	Units	D.F.	RptLimit		Qual
Reactive Sulfide		BRL	mg/Kg	1	25		

QC Type: Duplicate

QC Sample ID: 13101510.01

Parameter	QCSample Result	Sample Result	Units	RPD	RPD CtrlLimit		Qual
Reactive Sulfide	BRL	-16	mg/Kg		20		

QC Type: LCS and LCSD

Parameter	LCS Spk Added	LCS Result	LCS % Rec	LCSD Spk Added	LCSD Result	LCSD % Rec	RPD	RPD CtrlLimit	%Recovery CtrlLimit	Qual
Reactive Sulfide	1000	804.64	80.5	1000	844.48	84.4	4.8	20	40-120	

Refer to the Definition page for terms.

QUALITY CONTROL CERTIFICATE

Job ID : 13101510 **Date :** 11/4/2013

Analysis : **Reactive Cyanide** **Method :** **SW-846 7.3** **Reporting Units :** **mg/Kg**

QC Batch ID : Qb13110426 **Created Date :** 11/01/13 **Created By :** Srani

Samples in This QC Batch : 13101510.01

Sample Preparation : PB13110418 **Prep Method :** SW-846 7.3 **Prep Date :** 11/01/13 16:00 **Prep By :** Srani

QC Type: Method Blank

Parameter	CAS #	Result	Units	D.F.	RptLimit		Qual
Reactive Cyanide		BRL	mg/Kg	5.00	125		

QC Type: Duplicate

QC Sample ID: 13101510.01

Parameter	QCSample Result	Sample Result	Units	RPD	RPD CtrlLimit		Qual
Reactive Cyanide	BRL	BRL	mg/Kg		20		

QC Type: LCS and LCSD

Parameter	LCS Spk Added	LCS Result	LCS % Rec	LCSD Spk Added	LCSD Result	LCSD % Rec	RPD	RPD CtrlLimit	%Recovery CtrlLimit	Qual
Reactive Cyanide	25	11.5	46.1	25	12.1	48.4	4.8	20	40-120	

Refer to the Definition page for terms.

QUALITY CONTROL CERTIFICATE

Job ID : 13101510 **Date :** 11/4/2013

Analysis : **TCLP Metals** **Method :** **SW-846 6010C** **Reporting Units :** **mg/L**

QC Batch ID : Qb13110458 **Created Date :** 11/04/13 **Created By :** Ggorane

Samples in This QC Batch : 13101510.01

Digestion :	PB13110443	**Prep Method :**	SW-846 3010A	**Prep Date :**	11/04/13 10:21	**Prep By :**	Eperez
TCLP Prep :	PB13110401	**Prep Method :**	SW-846 1311	**Prep Date :**	11/01/13 17:00	**Prep By :**	Sgarcia

QC Type: Method Blank

Parameter	CAS #	Result	Units	D.F.	RptLimit		Qual
Arsenic	7440-38-2	BRL	mg/L	1	0.04		
Barium	7440-39-3	BRL	mg/L	1	0.04		
Cadmium	7440-43-9	BRL	mg/L	1	0.04		
Chromium	7440-47-3	BRL	mg/L	1	0.04		
Lead	7439-92-1	BRL	mg/L	1	0.04		
Selenium	7782-49-2	BRL	mg/L	1	0.1		
Silver	7440-22-4	BRL	mg/L	1	0.04		

QC Type: LCS and LCSD

Parameter	LCS Spk Added	LCS Result	LCS % Rec	LCSD Spk Added	LCSD Result	LCSD % Rec	RPD	RPD CtrlLimit	%Recovery CtrlLimit	Qual
Arsenic	2	2.14	107	2	2.19	109	2.3	20	80-120	
Barium	2	1.82	91.2	2	1.82	90.9	0.3	20	80-120	
Cadmium	2	1.98	98.8	2	2.02	101	2.3	20	80-120	
Chromium	2	1.95	97.3	2	1.96	98.1	0.8	20	80-120	
Lead	2	1.77	88.5	2	1.82	90.8	2.6	20	80-120	
Selenium	2	2.12	106	2	2.18	109	2.6	20	80-120	
Silver	2	2.00	99.9	2	2.00	100	0.3	20	80-120	

QC Type: MS and MSD
QC Sample ID: 13101549.01

Parameter	Sample Result	MS Spk Added	MS Result	MS % Rec	MSD Spk Added	MSD Result	MSD % Rec	RPD	RPD CtrlLimit	%Rec CtrlLimit	Qual
Arsenic	BRL	2	2.16	108						45-138	
Barium	0.3300	2	2.12	89.3						39-135	
Cadmium	BRL	2	1.97	98.5						56-125	
Chromium	BRL	2	1.93	95						52-125	
Lead	BRL	2	1.69	84.4						55-125	
Selenium	BRL	2	2.15	107						18-137	
Silver	BRL	2	1.99	99.7						26-148	

Refer to the Definition page for terms.

QUALITY CONTROL CERTIFICATE

Job ID : 13101510 **Date :** 11/4/2013

Analysis : **TCLP Metals, Mercury** **Method :** **SW-846 7470A** **Reporting Units :** **mg/L**

QC Batch ID : Qb13110462 **Created Date :** 11/04/13 **Created By :** Ssrinivasan

Samples in This QC Batch : 13101510.01

Digestion :	PB13110448	**Prep Method :**	SW-846 7470A	**Prep Date :**	11/04/13 08:50	**Prep By :**	Ssrinivasan
TCLP Prep :	PB13110401	**Prep Method :**	SW-846 1311	**Prep Date :**	11/01/13 17:00	**Prep By :**	Sgarcia

QC Type: Method Blank

Parameter	CAS #	Result	Units	D.F.	RptLimit		Qual
Mercury	7439-97-6	BRL	mg/L	1	0.0005		

QC Type: LCS and LCSD

Parameter	LCS Spk Added	LCS Result	LCS % Rec	LCSD Spk Added	LCSD Result	LCSD % Rec	RPD	RPD CtrlLimit	%Recovery CtrlLimit	Qual
Mercury	0.005	0.0048	96.4	0.005	0.0047	93.2	3.4	20	71-143	

QC Type: MS and MSD
QC Sample ID: 13101500.01

Parameter	Sample Result	MS Spk Added	MS Result	MS % Rec	MSD Spk Added	MSD Result	MSD % Rec	RPD	RPD CtrlLimit	%Rec CtrlLimit	Qual
Mercury	BRL	0.005	0.0051	102						61-175	

Refer to the Definition page for terms.

QUALITY CONTROL CERTIFICATE

Job ID : 13101510 **Date :** 11/4/2013

Analysis : **TCLP Semivolatiles** **Method :** **SW-846 8270D** **Reporting Units :** **mg/L**

QC Batch ID : Qb13110468 **Created Date :** 11/04/13 **Created By :** Yzhang

Samples in This QC Batch : 13101510.01

Extraction :	PB13110447	**Prep Method :**	SW-846 3510C	**Prep Date :**	11/04/13 10:00	**Prep By :**	Msoria
TCLP Prep :	PB13110401	**Prep Method :**	SW-846 1311	**Prep Date :**	11/01/13 17:00	**Prep By :**	Sgarcia

QC Type: Method Blank

Parameter	CAS #	Result	Units	D.F.	RptLimit		Qual
1,4-Dichlorobenzene	106-46-7	BRL	mg/L	1	0.05		
2,4,5-Trichlorophenol	95-95-4	BRL	mg/L	1	0.05		
2,4,6-Trichlorophenol	88-06-2	BRL	mg/L	1	0.05		
2,4-Dinitrotoluene	121-14-2	BRL	mg/L	1	0.05		
2-Methylphenol	95-48-7	BRL	mg/L	1	0.05		
3- & 4-Methylphenols	108-39-4 & 106-44-5	BRL	mg/L	1	0.1		
Hexachlorobenzene	118-74-1	BRL	mg/L	1	0.05		
Hexachlorobutadiene	87-68-3	BRL	mg/L	1	0.05		
Hexachloroethane	67-72-1	BRL	mg/L	1	0.05		
Nitrobenzene	98-95-3	BRL	mg/L	1	0.05		
Pentachlorophenol	87-86-5	BRL	mg/L	1	1.25		
Pyridine	110-86-1	BRL	mg/L	1	0.05		
2-Fluorophenol(surr)	367-12-4	37.1	%	1	17-115		
Phenol-d6(surr)	13127-88-3	23.7	%	1	15-120		
Nitrobenzene-d5(surr)	4165-60-0	69.7	%	1	20-120		
2-Fluorobiphenyl(surr)	132-60-8	76.3	%	1	30-115		
2,4,6-Tribromophenol(surr)	118-79-6	16.1	%	1	10-120		
p-Terphenyl-d14(surr)	1718-S1-0	108	%	1	30-140		

QC Type: LCS and LCSD

Parameter	LCS Spk Added	LCS Result	LCS % Rec	LCSD Spk Added	LCSD Result	LCSD % Rec	RPD	RPD CtrlLimit	%Recovery CtrlLimit	Qual
1,4-Dichlorobenzene	0.25	0.134	53.6	0.25	0.152	60.8	12.6	35	24-134	
2,4,5-Trichlorophenol	0.25	0.088	35.2	0.25	0.086	34.4	2.3	35	6-115	
2,4,6-Trichlorophenol	0.25	0.063	25.2	0.25	0.074	29.6	16.1	35	4-138	
2,4-Dinitrotoluene	0.25	0.12	48	0.25	0.153	61.2	24.2	35	32-114	
2-Methylphenol	0.25	0.104	41.6	0.25	0.101	40.4	2.9	35	6-132	
3- & 4-Methylphenols	0.5	0.161	32.2	0.5	0.17	34	5.4	35	29-132	
Hexachlorobenzene	0.25	0.16	64	0.25	0.183	73.2	13.4	35	44-142	
Hexachlorobutadiene	0.25	0.123	49.2	0.25	0.137	54.8	10.8	35	20-124	
Hexachloroethane	0.25	0.158	63.2	0.25	0.181	72.4	13.6	35	14-136	
Nitrobenzene	0.25	0.166	66.4	0.25	0.211	84.4	23.9	35	38-146	
Pyridine	0.25	0.061	24.4	0.25	0.068	27.2	10.9	35	6-112	

Refer to the Definition page for terms.

QUALITY CONTROL CERTIFICATE

Job ID : 13101510 **Date :** 11/4/2013

Analysis : TCLP Semivolatiles **Method : SW-846 8270D** **Reporting Units : mg/L**

QC Batch ID : Qb13110468 **Created Date :** 11/04/13 **Created By :** Yzhang

Samples in This QC Batch : 13101510.01

QC Type: MS and MSD
QC Sample ID: 13101312.01

Parameter	Sample Result	MS Spk Added	MS Result	MS % Rec	MSD Spk Added	MSD Result	MSD % Rec	RPD	RPD CtrlLimit	%Rec CtrlLimit	Qual
1,4-Dichlorobenzene	BRL	0.25	0.151	60.4						24-134	
2,4,5-Trichlorophenol	BRL	0.25	0.192	76.8						6-115	
2,4,6-Trichlorophenol	BRL	0.25	0.186	74.4						4-138	
2,4-Dinitrotoluene	BRL	0.25	0.176	70.4						32-114	
2-Methylphenol	0.127	0.25	0.233	42.4						6-132	
3- & 4-Methylphenols	BRL	0.5	0.24	48						29-132	
Hexachlorobenzene	BRL	0.25	0.229	91.6						44-142	
Hexachlorobutadiene	BRL	0.25	0.195	78						20-124	
Hexachloroethane	BRL	0.25	0.207	82.8						14-136	
Nitrobenzene	BRL	0.25	0.201	80.4						38-146	
Pentachlorophenol	BRL	0.25	0.038	15.2						25-125	M2
Pyridine	BRL	0.25	0.015	6.00						6-112	

Refer to the Definition page for terms.

A & B Labs — *Chain of Custody* — The Chain of Custody is a Legal Document — Page ____ of ____

10100 East Fwy (I-10)
Suite 100
Houston, TX 77029
713-453-6060
1-877-478-6060 Toll Free
713-453-6091 Fax
ablabs.com

A&B JOB ID # 1310510

5. Project #

1. REPORT TO:
Company: GBSC
Address: 14303 Hwitsh, TX
Contact: Grey Bowman
Phone: 713-419-6076
Fax: ☐
E-mail: ☐ gallenb1963@gmail.com

2. INVOICE TO:
Company:
Address:
Contact:
Phone:
Fax: ☐
E-mail: ☐

3. PO #
3a. A&B Quote #
4. Turnaround Time (Business Days)
☐ 1 Day* ☐ Other:
☒ 2 Days*
☐ 3 Days* *Surcharge applies
☐ 7 Days - Standard

Tubal Cain Gas Free Services
Port Arthur, Texas

6. Project Name/Location: TCM Nap Caustic

7. Reporting Requirement:
☐ TRRP Limits only ☐ TRRP Rpt. Package ☐ See Attached ☐ Standard Level II ☐ PST ☐ MDL ☐ EDD

8. Sampler's Name & Company (PLEASE PRINT) — Sampler's Signature & Date

LAB USE ONLY	9. Sample ID and Description	10. Sampling Date	Time 24hr	11. Comp.	Grab	12. Matrix: Water	Soil	Sludge	Oil	Drinking Water	Air	Other	No. of Containers	Analyses/Methods: TCLP Metals	TCLP Sem. Volatiles	RCL				18. REMARKS
01	TCM Nap Caustic	10/31						X						X	X	X				

13. 14. Containers* / 15. Preservatives** / 16. PH-Lab Only / 17.

19. RELINQUISHED BY	DATE	TIME	20. RECEIVED BY	DATE	TIME
1 Grey Bowman	10/31	1240	Amber Becerra	10/31/13	12:37 pm
2					
3					

21. KNOWN HAZARDS/COMMENTS

Temperature: 22.4 °C
Thermometer ID 1020-23320
Intact: Y or N Initials AB

A&B cannot accept verbal changes
Please FAX written changes to 713-453-6091

Samples will be disposed of after 30 days

*Containers: VOA - 40 ml vial; 4 oz/8 oz - glass wide mouth; A/G - Amber/Glass 1 Liter; P/O - Plastic/other ____

**Preservatives: C - Cool; OH - NaOH; H - HCl; T - $NA_2S_2O_3$; N - HNO_3; X - Other ____; S - H_2SO_4

METHOD OF SHIPMENT

BILL OF LADING/TRACKING #

LAB USE ONLY SAMPLING RENTAL PAL

Page 1 of 13

TXR000080426

Sample Condition Checklist

A&B JobID : **13101510**	Date Received : **10/31/2013**	Time Received : **12:37PM**
Client Name : **GB Sales & Consulting**		
Temperature : **22.4°C**	Sample pH : **na**	
Thermometer ID : **102002320**	pH Paper ID : **na**	

	Check Points	Yes	No	N/A
1.	**Cooler seal present and signed.**		X	
2.	**Sample(s) in a cooler.**		X	
3.	**If yes, ice in cooler.**		X	
4.	**Sample(s) received with chain-of-custody.**	X		
5.	**C-O-C signed and dated.**	X		
6.	**Sample(s) received with signed sample custody seal.**		X	
7.	**Sample containers arrived intact. (If no comment).**	X		
8.	**Matrix :** Water ☐ Soil ☐ Liquid ☐ Sludge ☑ Solid ☐ Cassette ☐ Tube ☐ Bulk ☐ Badge ☐ Food ☐ Other ☐			
9.	**Sample(s) were received in appropriate container(s).**	X		
10.	**Sample(s) were received with proper preservative**	X		
11.	**All samples were logged or labeled.**	X		
12.	**Sample ID labels match C-O-C ID's**	X		
13.	**Bottle count on C-O-C matches bottles found.**	X		
14.	**Sample volume is sufficient for analyses requested.**	X		
15.	**Samples were received within the hold time.**	X		
16.	**VOA vials completely filled.**			X
17.	**Sample accepted.**	X		

Comments : Include actions taken to resolve discrepancies/problem:

Received by : ABecerra

Check in by/date : ABecerra / 10/31/2013

TM Deer Park Services Limited Partnership
WASTE PROFILE

TMDP Profile/WS#:

P.O. Box 1914 • 2525 Independence Parkway South • Deer Park, TX 77536-1914 • Phone: 281/930-2525 • Fax: 281/930-2535

I. CUSTOMER/GENERATOR INFORMATION:

Customer Name: GB Sales & Consulting
Billing Address: 14303 Hartshill Dr
Houston, TX 77044
Contact: Greg Bowman
Phone: 713-419-6076
Fax:
E-MAIL: gallenB1963@gmail.com

Generator Name: Tubal Cain Gas Free
Physical Address: 8700 Old Yacht Club Rd
Port Arthur, TX 77642
Mailing Address: 8700 Old Yacht Club Rd
Port Arthur, TX 77642
24-Hour Contact: Cade Durio
24-Hour Phone: 409-960-9273

II. WASTE GENERATION DATA:

Waste Name: Neutralized Naphthenic Caustic Solution
Describe the process that generates this waste: Naphthenic caustic solution neutralized with a solution of ethylene glycol and Sulfuric Acid. Bleach also added to control odor.
Annual Volume: 25,000 [ ] lbs [ ] tons [X] gals [ ] drums Container Size/Type: TT Shipping Frequency: ____ per Year
EPA ID No. TXR000086426 State ID No. 90733 State Waste Code [ ] SIC# [ ]

III. RCRA DATA:

Is waste hazardous per RCRA? [X] Yes [ ] No If yes, please attach completed Land Disposal Restriction Notification Form.
EPA Hazardous Waste Codes: D001 D002

IV. WASTE PROPERTIES:

(A) pH Range: 1.8 to 4.5
(B) Specific Gravity: 1.05 to 1.19
(C) Appearance (e.g. yellow, clear, turbid, etc.): Cobalt Blue
(D) Physical State: [ ] Solid [X] Liquid [ ] Semi-Solid
(E) Odor: [X] Strong [ ] Mild [ ] None
(F) Describe Odor (acrid, rancid, etc.): Naphthenic Acid Odor
(G) Flash Point: 115 [X] °F [ ] °C [X] Closed Cup [ ] Open Cup
(H) Vapor Pressure ____ (PSI)
(I) Settled Solids (by vol.): 0 to .5 %
(J) Insoluble Constituents (by vol.): .1 to 2 %
(K) Dry Weight Factor: 2-6%

Mark if any of the following pertain to this waste:

[ ] Pyrophoric [ ] Pesticides [ ] PCBs > 50 ppm
[ ] Hydrophobic [ ] Dioxins [ ] Universal
[ ] Biological [ ] Carcinogens [ ] Lab Pack
[ ] Explosives [ ] Sulfides [ ] NESHAP-Regulated
[ ] Radioactive [ ] Organics (Part____, Subpart____)

Does the waste liberate any gases above PEL into the headspace?

	Yes	No	AMOUNT
Hydrogen Cyanide	[ ]	[X]	
Hydrogen Sulfide	[ ]	[X]	
Sulfur Dioxide	[ ]	[X]	
Other Toxic Gas	[ ]	[X]	

Specify: N/A

V. SHIPPING INFORMATION:

DOT Shipping Name: Waste Corrosive Liquids, Acidic, inorganic (Contains Sulfuric Acid)
DOT Hazard Class: 8 UN/NA Number: UN3264 Packing Group: III Reportable Qty. (Lbs): N/A
Required personnel protective equipment & procedures: Gloves, goggles, Boots, PVC Apron
Other comments or hazards including effects on human health in the event of a release: N/A

VI. COMPONENTS: Account for 100% of the waste components. Include metals, UHCs, TRI-reportable chemicals, etc.

CAS # (Optional)	Constituent	Range	Unit	CAS # (Optional)	Constituent	Range	Unit
	Sodium Sulfate	3 - 5				-	
	Dirt, silt, sand	.1 - .3				-	
	Water	95 - 98				-	
	Sodium Naphthenates	.1 - .4				-	
	Diethyl Disulfide	Trace / Very low ppm				-	
	Dimethyl Disulfide	Trace / Very low ppm				-	
	Mercaptans	Trace / Very low ppm				-	
	Jet fuel	Trace / Low ppm				-	
		-				-	
		-				-	

Specific constituents of concern: ☐ Check here if the following constituents do not apply to the waste described in this document.

79-06-1	Acrylamide	N/A		7446-27-7	Lead phosphate	N/A	
309-00-02	Aldrin	N/A		628-86-4	Mercuric fulminate	N/A	
20859-73-8	Aluminum phosphide	N/A		56-49-5	3-Methylcholanthrene	N/A	
7778-39-4	Arsenic acid	N/A		79-46-9	2-Nitropropane	N/A	
1303-28-2	Arsenic pentoxide	N/A		924-16-3	N-Nitrosodi-n-butylamine	N/A	
1327-53-3	Arsenic trioxide	N/A		1116-54-7	N-Nitrosodiethanolamine	N/A	
92-87-5	Benzidine	N/A		55-18-5	N-Nitrosodiethylamine	N/A	
98-07-7	Benzotrichloride	N/A		62-75-9	N-Nitrosodimethylamine	N/A	
31984-6	alpha-BHC	N/A		10595-95-6	N-Nitrosomethylethylamine	N/A	
319-85-7	beta-BHC	N/A		684-93-5	N-Nitroso-N-methylurea	N/A	
107-30-2	Chloromethylmethyl ether	N/A		930-55-2	N-Nitrosopyrrolidine	N/A	
111-44-4	sym-Dichloroethyl ether	N/A		7803-51-2	Phosphine	N/A	
542-88-1	sym-Dichloromethyl ether	N/A		50-55-2	Reserpine	N/A	
60-57-1	Dieldrin	N/A		1314-80-3	Sulphur phosphide	N/A	
56-53-1	Diethylstilbesterol	N/A		78-00-2	Tetraethyl lead	N/A	
122-66-7	1,2-Diphenylhydrazine	N/A		1314-32-5	Thallic oxide	N/A	
621-64-7	Di-n-propylnitrosamine	N/A		6533-73-9	Thallium carbonate	N/A	
	Dioxins	N/A		7791-12-0	Thallium chloride	N/A	
298-04-4	Disulfoton	N/A		10102-45-1	Thallium nitrate	N/A	
115-29-7	Endosulfan	N/A		12039-52-0	Thallium selenite	N/A	
33213-6-5	Endosulfan II	N/A		7446-18-6	Thallium sulfate	N/A	
	Endrin metabolites	N/A		62-56-6	Thiourea	N/A	
106-93-4	Ethylene dibromide	N/A		137-26-8	Thiram	N/A	
76-44-8	Heptachlor	N/A		99-35-4	1,3,5-Trinitrobenzene	N/A	
302-01-2	Hydrazine	N/A		1314-84-7	Zinc phosphide	N/A	
7439-92-1	Lead	N/A					

Waste characterization determined by: ☒ Process Knowledge ☒ Waste Analysis (Provide copy) ☐ MSDS/SDS(s) (Provide copy)

VII. Certification

I hereby certify and warrant that the information supplied on this form, and any attachments, represents a complete and accurate identification and description of this waste material, its constituents and its known or suspected hazards. I further certify and warrant that this information is the result of an analysis of a representative sample of the waste obtained and analyzed in accordance with testing procedures of the U.S. Environmental Protection Agency or by the application of knowledge of the process generating the waste materials per EPA Guidelines.

PRINTED NAME: Cade Durio SIGNATURE: [signature] DATE: 11/14/13

TM Deer Park Services Limited Partnership

LAND DISPOSAL RESTRICTION (LDR) NOTIFICATION

Generator Name:	Tubal Cain Gas free
TMDP Profile/WS #:	
Manifest Number:	

EPA Waste Code(s)	Wastewater (WW)/ Non-wastewater (NW)	Subcategory / Constituent(s) of Concern[1]	Treatment Status Code
D001	WW	N/A	D4
D002	WW	N/A	D4
The following are the underlying hazardous constituents (UHCs)[2] 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[1] and the UHCs (see 40 CFR 268.2(i))[2] 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 Deer Park Services Limited Partnership (TMDP) pursuant to applicable federal regulations, including 40 CFR §268.7, and that TMDP 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: Cade Durio
Printed Name:

Plant Manager
Title

11/14/13
Date

(Rev. 9-19-2012)

Troy Bowman chart on Nap Caustic

custom	Trans/vendor	PO	Project	Date	Job	Manifest	facility	Invoice	FRT Bill	Disp bill	Other invoice	Gallons/to	Notes
GBSC	A&B		TC Nap	10/31/2013	Nap Caustic Tests	na	A&B Labs	NC			179250		
GBSC	Airgas		TC Nap	10/31/2013	nitrogen		TC	NC			9.914E+09		
GBSC	VR		TC Nap	11/8/2013	Jose Albarran		GBSC	NC			1051		
GBSC	Bates		TC Nap	11/13/2013	deliver 9 drums bleach	13119611	TC	NC			13119611		
GBSC	GBSC	GF13499	TC Nap	11/14/2013	Nap caustic management, 4 vac		Seabreeze	12662				4	
GBSC	ESH		TC Nap	11/15/2013	Avery - suck and filter water from		TC	NC			1-32258		
GBSC	ESH		TC Nap	11/16/2013	Avery - suck and filter water from		TC	NC			1-32259		
GBSC	Source One		TC Nap	11/17/2013	Labor, Services, and Per Diem (11/14-		GBSC	NC			1112		
GBSC	ESH		TC Nap	11/18/2013	Avery - suck and filter water from		TC	NC			1-32260		
GBSC	Bates		TC Nap	11/19/2013	Fly Ash (10 super	13119615	TC	NC			13119615		
GBSC	Airgas		TC Nap	11/20/2013	Deliver 12 pack to TC		TC	NC			9.022E+09		12 pack
GBSC	Bates		TC Nap	11/20/2013	Fly Ash (22 super sacs)	13119622	TC	NC			13119622		
GBSC	ESH		TC Nap	11/20/2013	Washout		Ecowerks	NC		126578	1-32262		only washed 4 hoses
GBSC	Tidal		TC Nap	11/21/2013	Rolltop box(11/18-11/21)			NC			BE185173		
GBSC	Bates		TC Nap	11/22/2013	Fly Ash (10 super	13119629	TC	NC			13119629		
GBSC	VR		TC Nap	11/22/2013	Jose Albarran		TC	NC			1055		
GBSC	Source One		TC Nap	11/22/2013	Labor and Per Diem (11/18-11/22)		GBSC	NC			1114		
GBSC	A&B		TC Nap	11/22/2013	RCI - 3 Day Rush, check flash on nap		A&B Labs	NC			180393		
GBSC	Tidal		TC Nap	11/27/2013	RB1025054 to TC. Nap box to seabreeze	002228718GBF	Seabreeze	NC	BE185395	10429	BE185395	19	
GBSC	Bates		TC Nap	11/27/2013	Fly Ash (20 super sacs)	13119640	TC	NC			13119640		
GBSC	Source One		TC Nap	11/27/2013	Labor and Per Diem (11/26-11/27)		GBSC	NC			1116		Lowes - Insulation
GBSC	Tidal		TC Nap	11/27/2013	Nap box to seabreeze	002228717GBF	Seabreeze	NC	BE185576	10429	BE185576	15	unable to pick up 2nd box
GBSC	Tidal		TC Nap	11/29/2013	Nap box to seabreeze	002228714GBF	Seabreeze	NC	BE185394	10429	BE185394	16	
GBSC	Tidal		TC Nap	11/30/2013	Frac Box (11/15-11/30)		TC	NC			BE185175		
GBSC	Airgas		TC Nap	11/30/2013	nitrogen		TC	NC			9.914E+09		
GBSC	Tidal		TC Nap	11/30/2013	Roll top Box (11/19-11/30)		TC	NC			BE185171		
GBSC	Tidal		TC Nap	11/30/2013	Roll top box (11/21-11/30)		TC	NC			BE185168		
GBSC	Tidal		TC Nap	11/30/2013	Roll top box (11/27-11/30)		TC	NC			BE185166		
GBSC	Tidal		TC Nap	11/30/2013	Roll top box (11/27-11/30)		TC	NC			BE185167		
GBSC	Tidal		TC Nap	11/30/2013	Roll top box and vac box (11/18-11/30)	1	TC	NC			BE185172		

Tubal Cain Gas Free Services
Port Arthur, Texas
GKR0008326

TXR000080426

custom	Trans/vendor	PO	Project	Date	Job	Manifest	facility	Invoice	FRT Bill	Disp bill	Other invoice	Gallons/to	Notes
GBSC	Bates		TC Nap	12/2/2013	fly ash for nap boxes (10 super sacs)	13129645	TC	NC			13129645		
GBSC	Tidal		TC Nap	12/2/2013	Nap box to seabreeze	002228715gbf	Seabreeze	NC	BE185396	10558	BE185396		
GBSC	Tidal		TC Nap	12/3/2013	Nap box to seabreeze	002333602gbf	Seabreeze	NC	BE185397	10558	BE185397		Driver showed up a 7 but wasn't supposed to be there until 10. Start clock at 10am.
GBSC	Tidal		TC Nap	12/3/2013	Nap box to seabreeze, vacuum box VB-0725017	002333605gbf	Seabreeze	NC	BE185574	10558	BE185574		
GBSC	Bluebonnet		TC Nap	12/4/2013	Nebin United Rentals (off road forklift and excavator off rent. About 10 days rent)		TC	NC			2400		The off road forklift and mini excavator were called off rent today. These are the units we have been using at tubal Cain. The off rent number is 20000905
GBSC	Source One		TC Nap	12/6/2013	John blue water		TC	NC			1117		
TC	na	GF13506	TC Nap	12/9/2013	credit TC for 8000		TC	12666				8,000	

Tubal Cain Gas Free Services
Port Arthur, Texas

Cade Durio

From: greg B <gallenb1963@gmail.com>
Sent: Monday, November 18, 2013 11:53 AM
To: Rose Bainum; Cade Durio
Cc: Matt Bowman; Jenelle Honey
Subject: modification of profile
Attachments: Analytical on TCM Spent Napthenic caustic.pdf

Rose - we would like to modify the Tubal Cain profile for Class 1 rust and sludge. Modifications as follows...

Odor - mild to strong

Material may contain solids from neutralized spent napthenic caustic generated from neutralization process. This material will be dry. See analysis of spent napthenic caustic solution (prior to neutralization and solidification).

--
Greg Bowman
PH: 713-419-6076
FX: 832-553-2897

Total Cam/Gas Fred Services
Port Arthur, Texas
TXR000080426

greg B <gallenb1963@gmail.com>

aqueous phase of neutralized napthenic caustic

1 message

greg B <gallenb1963@gmail.com> Wed, Nov 20, 2013 at 11:39 AM
To: Cliff Hardy <CHardy@newpark.com>
Cc: Jenelle Honey <gbscassistant@gmail.com>
Bcc: Matt Bowman <mbowman@mlbconsultant.com>

Cliff - here is a summary of the material we discussed this morning.

The raw material is spend napthenic caustic (see attached analysis on raw material - RCI/TCLP metals and semi-volatiles.

To mitigate some of the odor issues, we added some industrial bleach.
To neutralize the PH, we added a solution containing sulfuric acid, glycol and water.
We drove the PH to around 3. At this point, the material separated into an oily organic phase and an aqueous phase. We segregated the water through a filter into a separate tank. The material is cobalt blue and has some odor but not particularly strong as mercaptans go. I will run an RCI on this material to verify that it does not have a flash.

I will bring a sample of this material to your facility tomorrow around 10AM.
--
Greg Bowman
PH: 713-419-6076
FX: 832-553-2897

Analytical on TCM Spent Napthenic caustic.pdf
1214K

LABORATORY TEST RESULTS

Job ID : 13111135

Date 11/27/2013

Client Name: GB Sales & Consulting

Attn: Greg Bowman

Project Name: TCM Nap Water

Client Sample ID: TCM Nap Water
Date Collected: 11/22/13
Time Collected: 16:00
Other Information:

Job Sample ID: 13111135.01
Sample Matrix Water

Test Method	Parameter/Test Description	Result	Units	DF	Rpt Limit	Reg Limit	Q	Date Time	Analyst
SW-846 1010A	Ignitability (Flash Point)								
	Ignitability	>150	°F	1				11/25/13 09:45	MAM
SW-846 7.3	Reactive Cyanide								
	Reactive Cyanide[1]	BRL	mg/L	1	25			11/22/13 16:45	SR
SW-846 7.3	Reactive Sulfide								
	Reactive Sulfide[1]	BRL	mg/L	1	25			11/22/13 16:55	SR
SW-846 9040C	Corrosivity, pH								
	pH	3.70	s.u.				H3	11/26/13 15:10	AJ
	Temperature when read, °C[1]	19.9	s.u.				H3	11/26/13 15:10	AJ

[1]-Parameter not available for accreditation

Tubal Cain Gas Free Services
Port Arthur, Texas Solids from naphthenic caustic treatment

TXR000080426

TCGF 1

Rinse 195 Filter 88100

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002228718 GBF

5. Generator's Name and Mailing Address: Tubal Cain Gas Free, 8300 Old Yacht Club Rd., Port Arthur TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: Tri-Parks Bearing Service Co.
U.S. EPA ID Number: TX

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: Seabreeze Landfill, 10310 FM 523, Angleton TX 77515
U.S. EPA ID Number
Facility's Phone: 979-864-4442

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. Non DOT non RCRA Non Haz Class 1 Oily Sludge Rust w/ solids/salts and Naphthenic Caustic	1	Roll.	25	gards	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Profile: SBL 13900 (Amended)
13-635 per Rose

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Cody Boggan
Signature
Month Day Year: 11 27 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Aaron Parmer
Signature
Month Day Year: 11 27 13
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Jim Lorsme
Signature
Month Day Year: 11 27 13

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

73680 RO-207 501

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) FEW

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90735
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002228717 GBF

5. Generator's Name and Mailing Address: Tubal-Cain Gas Free, 8700 Old Yacht Club Rd., Port Arthur, TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-967-8800

6. Transporter 1 Company Name: ETW Inc — U.S. EPA ID Number: 87489

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Seabreeze Land Fill, 10310 FM 523, Angleton, TX 77515 — U.S. EPA ID Number:
Facility's Phone: 979-864-4442

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON. DOT Non Haz. Non RCRA Class 1 Oily Sludge Rust w/ solids Scale and Naphthalic Coating	1	Roll.	25	Yrd.	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
RB-0225121 Port 19915 13-635

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Cody Boggs — Signature: — Month 11 Day 27 Year 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ricky Tucker Jr — Signature: — Month 11 Day 27 Year 13
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H132 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Jim Ne[illegible] — Signature: — Month 11 Day 27 Year 13

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 96733
2. Page 1 of
3. Emergency Response Phone:
4. Manifest Tracking Number: 002228714 GBF

5. Generator's Name and Mailing Address: Tubal Cain Gas Free, 8700 Old Yacht Club Rd., Port Arthur, TX 77642
Generator's Site Address (if different than mailing address):
Generator's Phone: 409-902-8800

6. Transporter 1 Company Name: Tidal Tanks
U.S. EPA ID Number:

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Seabreeze Land Fill, 10310 FM 523, Angleton TX 70555
U.S. EPA ID Number:
Facility's Phone: 979-864-4442

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. Non DOT Non Haz Non RCRA Oily Sludge / Rust w/solids Scale and Naturally occurring	1	RLF	25	yards	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Profile: 13-0035

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Cody Briggs
Signature:
Month Day Year: 11 29 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Arturo Ramirez
Signature:
Month Day Year: 11 29 13
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H132 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name:
Signature:
Month Day Year: 11 29 13

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

145 2843 7 5040

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002228715 GBF

5. Generator's Name and Mailing Address: Tubal-Cain Gas Free, 6700 old Yacht Club Rd, Port Arthur TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: Eddie tanks
U.S. EPA ID Number:

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Seabreeze Landfill, 10310 FM 623, Angleton TX 77515
U.S. EPA ID Number:
Facility's Phone: 979-504-4442

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. Non DOT Non HAZ Non RCRA Oily Sludge/Rust w/ scale and Solids and Naphthenic Caustic	1	Roll.	25	yards	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Profile: 13-635

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Cody Boggan
Signature:
Month 12 Day 2 Year 13

GENERATOR

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

INT'L

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Aragon Pancho
Signature:
Month 12 Day 2 Year 13
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

TRANSPORTER

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H202 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name:
Signature:
Month 12 Day 2 Year 13

DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO COMPLETE AND RETURN ONE COPY TO GENERATOR

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Blim 195 7840

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90735
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002333605 GBF

5. Generator's Name and Mailing Address: Tubal Cain Gas Free, 8700 Old Yacht Club Rd, Port Arthur TX 77642
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-962-8800

6. Transporter 1 Company Name: [illegible]
U.S. EPA ID Number:

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Seabrook Landfill, 10310 FM 1625, Angleton TX 77515
U.S. EPA ID Number:
Facility's Phone: 979-864-4442

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NA 3077 Non Regu Liq Sludge N.O.S. (Oil and Gas Non Haz Nonhazardous waste)	1	Roll	25	gals	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Roll off 13-635

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Cody Roggen
Signature:
Month 12 Day 3 Year 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Arturo Palacios
Signature:
Month 12 Day 3 Year 13

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H130 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name:
Signature:
Month 12 Day 3 Year 13

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (if not the same as above)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Blue 4002 1447 (RB0625367)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 002333602 GBF

5. Generator's Name and Mailing Address: Tubal-Cain Gas Free, 9700 Old Yacht Club Rd, Port Arthur, TX 77692
Generator's Site Address (if different than mailing address)
Generator's Phone: 409-960-5800

6. Transporter 1 Company Name: Bealine Service Co Inc
U.S. EPA ID Number: TXR000066019

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: Seabrook Landfill, 10300 FM 523, Angleton TX 77515
U.S. EPA ID Number
Facility's Phone: 979-964-4442

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. Non DOT Non Haz Non RCRA Oily Sludge/Rust w/ trace oil Solids Naphthenic Sensitive	1	Roll	35	gyrads	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Profile 13-635

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Cody Rogers
Signature
Month 12 Day 3 Year 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Arthur Thatcher Thatcher
Signature: Arthur Thatcher
Month 12 Day 3 Year 13
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H132 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a
Printed/Typed Name
Signature
Month 12 Day 13 Year 13

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DISTRIBUTE COPIES AS APPROPRIATE

TANK	PREV. LEVEL	CURR. LEVEL	WATER
SPECIAL TANK	58	58	0
WATER 1	94	45	
WATER 2	55	47	
A-TANK	36	36	0
B-TANK	19	40	9
C1-TANK	103	103	
C2-TANK	0	0	
D-TANK	79	79	9
E-TANK	41	49	12
DIESEL TANK	23	20	0
DIESEL YARD TANK			
F-TANK	0	0	0
DIESEL PUMP	QUARTER	QUARTER	
G1-TANK	0	0	0
G2-TANK	clean	clean	

TOTES

DATE	PRODUCT	GALLONS	NUMBER
6/15/2013	ACRYLIC ACID	250	1
9/28/2013	vam	500	2
9/28/2013	vam water	250	1
10/24/2013	Nap. Spent Caustic	500	2
11/26/2013	ketone	1000	4
11/21/2013	caustic	750	3
12/6/2013	DEA	500	2
12/17/2013	used oil	750	3
EXTRA WATER TANK		38	WW

APPENDIX 12

Acrylic acid treatment

(6 pages)

Page 1 – Internal Tubal Cain spreadsheet showing acrylic acid (U008) management

Page 2 – email requesting modification of non-hazardous profile to include acrylic acid salt

Pages 3 - Waste profile indicating the material is non-hazardous waste

Pages 4 – email indicating that profile has been updated

Pages 5-6 – Manifests shipping treated acrylic acid (U008) as a non-hazardous waste

TXR000080426

Tubal Cain Gas Free Services
Port Arthur, Texas

	Trans/vendor	PO	Project	Date	Job	Manifest	facility	Invoice	FRT Bill	Disp bill	Other invoice	Gallons/to	Notes
TC	Debusk	GF11713		8/30/2012	water w/reject	003444162 JJK	Ecowerks	12115		10021357			washout of sludge from soybean solids project
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795985 JJK	Seabreeze	12101	1056			15	
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795982 JJK	Seabreeze	12101	1056			15	
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795986 JJK	Seabreeze	12101	1056			15	
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795988 JJK	Seabreeze	12101	1059	6973		15	
TC	Debusk	GF11680		8/31/2012	Soybean solids	005795989 jjk	Seabreeze	12101	1059	6973		15	
TC	Debusk	GF11713		8/31/2012	water	005795987 JJK	Ecowerks	12116	1058			4,500	
TC	Debusk	GF11713		9/4/2012	Water	005795990 JJK	Ecowerks	12117	1113	10021433		4,500	
TC	Debusk	GF11713		9/4/2012	Water (first load deduct 1 hr debusk, ecowerks charge is $	003444163 JJK	Ecowerks	12117	1113	10021433		4,400	
TC	Debusk	GF11713		9/7/2012	water	005795993 JJK	Ecowerks	12118	1184	10021490		4,500	
TC	Debusk	GF11681		9/10/2012	soybean sludge -	005795992 JJK	Newpark	12104	1133			4,602	
TC	Debusk	GF11681		9/11/2012	soybean sludge -	005795991 jjk	Newpark	12104	1184			4,532	
TC	Debusk	GF11681		9/11/2012	soybean sludge -	010397822 jjk	Newpark	12104	1184			4,511	
TC	Debusk	GF11681		9/13/2012	soybean sludge - brown frac	010397820 JJK	Seabreeze	12104	1184	6973		3,000	initial load on 9/12 for a few hours then load went to seabreeze at
TC	Debusk	GF11713		9/14/2012	water	010397809 JJK	Ecowerks	12119	1184	10021544		5,600	
TC	Debusk	GF11713		9/14/2012	water	010397808 JJK	Ecowerks	12119	1184	10021544		5,600	
TC	Debusk	GF11713		9/20/2012	water	005795981 JJK	Ecowerks	12120	1201	10021612		5,400	
TC	Debusk	GF11713		9/20/2012	water	005795966 JJK	Ecowerks	12120	1201	10021612		5,400	
TC	Debusk	GF11814		9/25/2012	water, 1 load	005795980 jjk	Ecowerks	12129	1280	10021663		5,250	
TC	Debusk	GF11814		9/26/2012	water, 1 load	005795979 jjk	Ecowerks	12129	1280	10021676		5,400	
TC	Debusk	GF 11816		9/27/2012	Gulfmark, water	005795968 JJK	Lonestar	12131	1263	1160		1,470	800 frt
TC	GBSC	GF11813		9/28/2012	Ammonia Drums	GBSC0003	GBSC	12130				4 drums	
TC	Pulido	GF 11816		9/28/2012	Gulfmark, Rag	GBSC0001	Bluebonnet	12131	37708			6,500	1800 frt Freedom of [illegible]
TC	Debusk	GF11815		9/28/2012	water, 1 load	005795970 JJK	Ecowerks	12132	1263	10021702		5,460	oil Value Removed
TC	Pulido	GF 11816		10/1/2012	Gulfmark, Rag	GBSC0002	Bluebonnet	12131	37734			2,340	1800 frt
TC	Debusk	GF 11812		10/4/2012	Water - reject for	rec	Ecowerks	12139	1354	10021768			
TC	Debusk	GF 11812		10/8/2012	Water - reject for	rec	Ecowerks	12139	1355	10021798			
tc	TWM	GF 11812		10/10/2012	water	005795969 JJK	Ecowerks	12139	77452	10021816		4,900	
TC	Debusk	12154		10/12/2012	Water	005795976 JJK	Ecowerks	12154	1394	10021849		2,400	
TC	Debusk	12154		10/12/2012	water	005795977 JJK	Ecowerks	12154	1394	10021849		5,460	
TC	GBSC	12156		10/18/2012	delivery of totes		TC	12156					
TC	Pulido	12156		10/18/2012	Gulfmark (Extra)	TCM101812	VR	12156	37813	1013		3,000	Maybe related to above
tc	Debusk	12155		10/19/2012	wash water	005795974 JJK	Ecowerks	12155	1456	100201936		3,000	70 bbl, 65 per hr + 12%
TC	Debusk	12155		10/19/2012	wash water	005795975 JJK	Ecowerks	12155	1456	100201936		3,000	70 bbl, 65 per hr + 12%
TC	Debusk	12156		10/23/2012	Acrylic Acid Sodium	010397818 JJK	Newpark	12156	1507			4,077	
TC	Debusk	12156		10/23/2012	Acrylic Acid Sodium	010397819 jjk	Newpark	12156	1507			4,386	
TC	Debusk	12158		10/23/2012	soybean	0010397817 jjk	Ecowerks	12158	1507	10021969		5600	
TC	Debusk	12157		10/23/2012	Wash water	005795973 jjk	Ecowerks	12157	1507	10021965		5800	
TC	Debusk	12156		10/24/2012	Acrylic Acid Sodium Salt & wash water	010397814 jjk	Newpark	12156	1509			1,200	
TC	Debusk	12157		10/24/2012	Acrylic Acid Sodium Salt & wash water	010397814 jjk	Newpark	12157	1509			4,260	
TC	Debusk	12158		10/24/2012	soybean	010397816jjk	Ecowerks	12158	1554	10021969		5600	
TC	Debusk	12157		10/24/2012	Wash water	010397815jjk	Ecowerks	12157	1554	10021979		5460	
TC	Debusk	12186		10/25/2012	wash water	010397813 jjk	Ecowerks	12186	1512	10021994		5,600	
TC	Debusk	12186		10/26/2012	wash water	005795965jjk	Ecowerks	12186	1526	10022005		5,600	
TC	Debusk	12187		10/30/2012	wash water	005795963jjk	Ecowerks	12187	1561	10022034		5,600	
TC	Debusk	12187		10/30/2012	wash water	005795964jjk	Ecowerks	12187	1561	10022034		5,600	
TC	Debusk	12189		11/6/2012	wash water	005795962jjk	Ecowerks	12189	1614	10022122		5,000	
TC	Debusk	12190		11/6/2012	Wash water w/diethylene glycol	010397812jjk	Newpark	12190	1614			3,029	

Acrylic Acid
with water treated
on-site in poly tank (rented)
w/ NaOH from Bluebonnet

~~New Facility~~

Cliff Hardy
Newpark Environmental Services LLC
409-781-6996
CHardy@newpark.com /
YHudspeth@newpark.com

Cade Durio
Tubal-Cain Marine Services
8737Old Yacht Club Rd
Port Arthur , Tx 77642
409-960-9273

10/22/2012

Dear Cliff;
Please take whatever actions are necessary at Newpark Environmental Services, LLC to modify our profile (0614131702BH) as follows:

Add up to 3% concentration of acrylic acid sodium salt.

Thank you very much for your assistance in this matter.

Cade Duiro
Project Manager
Tubal-Cain Marine Services

Used process knowledge + pH test

Page 1 of 2

Profile # 0614131702BH

NES TX/NID

NONHAZARDOUS SOLID WASTE DISPOSAL APPLICATION

1. GENERATOR CERTIFICATION

I hereby certify that I am the legal generator of the waste described below. The waste description on this form and all attachments are, to the best of my knowledge and ability, representative, complete, and accurate. This waste is not a regulated hazardous waste by USEPA, State of Origin, or State of Disposal, nor does it contain PCB's regulated by TSCA (ie., 40 CFR 761) or any local authority.

GENERATOR'S SIGNATURE/GENERATOR'S AUTHORIZED SIGNATORY:

Date: 6/11/12 Signature: Randy Cooper

Printed/Typed Name, Title, Employer: Randy Cooper, Operations Manager, Tubal-Cain Marine Services

2. GENERATOR INFORMATION

a. Generator's Name: Tubal-Cain Gas Free Yard
b. Generator's Address: 8737 Old Yacht Club Rd
City: Port Arthur State: TX Zip: TX
Telephone: (409) 982-8806
Fax: ( )
c. Generator Representative: Randy Cooper
Title: Operations Manager
Telephone: ( ) same as above
Fax: ( )

d. Billing Name: GB Sales & Consulting, LLC
e. Billing Address: 20123 Sunny Shores
City: Humble State: TX Zip: 77346
f. Contact Person: Greg Bowman
g. Telephone: 713-419-6076
Fax: ( )
Email: gallenb1963@gmail.com

3. WASTE DESCRIPTION

a. Waste Name/Waste Description: Barge wash water and water blanket

b. Process of Waste Generation: Water Blanket or wash water from barge cleaning operations

c. TCEQ Waste Code # (If Applicable): 00082051

d. Origin of Waste:

( ) Oil and Gas Facility
Field Name/#:
Lease Name/#
Well Name/#:
Rig Name/#:
Parish/County:
State:

(X) Industrial Facility
Facility Name: Tubal-Cain Gas Free Yard
Address: 8700A Old Yacht Club Rd
City: Port Arthur
Parish/County Jefferson
State: TX
Facility State Id 90733

e. Physical State: ( ) Solid ( ) Semi-Solid ( ) Liquid ( ) Powder ( ) Combination

f. Color Clear to dark brown or black Odor varis, organic, oily PPE Level (A-K,X) D

g. Anticipated Waste Volume: 15K ( ) Tons ( ) CuYds (X) Gals ( ) CuMtrs ( ) BBls
Frequency: ( ) Year ( ) Month (X) Week ( ) Day ( ) One Time ( ) Other

h. Specify Method of Shipment: Tank Truck

4. WASTE COMPOSITION & CONSTITUENTS

Physical Components	Concentration Range	Units	Amendments (Newpark Only)
Oil and Grease:	0 - ~~5~~ 10	%	MAS 9-13-12
Water:	~~00 - 100~~ 40 - 100	%	MAS 9-13-12
Solids:	0 - ~~2~~ 40	%	MAS 9-13-12
Foreign Debris:	< 1	%	
Other (List Below):			
See atatched	Supplemental Info Pages		
acrylic acid sodium salt	0-3	%	POC 10-22-2012
pH:	2.1-12.0	standard units	
Specific Gravity:	.98 - 1.05		
NORM Ra 226:	< 30	pCi/g	
Total Activity:	< 150	pCi/g	

revised 1/11/07

greg B <gallenb1963@gmail.com>

Profile Modification

1 message

Hudspeth, Yvonne <YHudspeth@newpark.com> Mon, Oct 22, 2012 at 2:44 PM
To: Greg Bowman <gallenb1963@gmail.com>
Cc: "Hoffpauir, Vicki" <VHoffpauir@newpark.com>

Greg,

I have attached the profile modification you requested this morning. We have added acrylic acid sodium salt 0-3% to your profile 0614131702BH. Let me know if you will ship tomorrow.

Thank you,

Yvonne Hudspeth

Newpark Environmental Services

26400 Wilber Rd

Winnie, TX 77665

Office: 409-794-3119

Fax: 409-794-1355

Email: yhudspeth@newpark.com

0614131702BH Tubal Cain revised 3.pdf
359K

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of 1
3. Emergency Response Phone: 409-962-8800
4. Manifest Tracking Number: 010397819 JJK

5. Generator's Name and Mailing Address
Tubal Cain Gas Free
8737 Old Yacht Club Rd
Port Arthur, TX 77642
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Schunk Services
U.S. EPA ID Number: 91061

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Newpark Environmental Services LLC
26400 Wilber Rd.
Winnie, TX 77665 409-794-3119
Facility's Phone:
U.S. EPA ID Number: 39098

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. Non-RCRA/Non-DOT Regulated Waste Water up to 3% Acrylic Acid	001	TT	5800 EST	G	0008	205	1
	2. Sodium Salt							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
Profile # 0614131702BH
4386 gal

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Michael Wells
Signature:
Month 10 Day 23 Year 12

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Jeremy Brandon
Signature:
Month 10 Day 23 Year 12
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H134 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Vicki Hoffpauir
Signature:
Month 10 Day 23 Year 12

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Tubal Cain Gas Free Services
Port Arthur, Texas

TXR000080426

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 90733
2. Page 1 of: 1
3. Emergency Response Phone: 409-962-8800
4. Manifest Tracking Number: 010397818 JJK

5. Generator's Name and Mailing Address
Tubal Cain Gas Free
8737 Old Yacht Club Rd
Port Arthur, TX 77642
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Debusk Services
U.S. EPA ID Number: 91061

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Newpark Environmental Services LLC
26400 Wilber Rd.
Winnie, TX 77665 409-794-3119
Facility's Phone:
U.S. EPA ID Number: 39098

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1 Non-RCRA/Non-DOT Regulated Waste Water up to 3% Acrylic Acid Sodium Salt	001	TT	5600	G	0008	205	1
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
Profile # 0614131702BH
4577 gal

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Michael Wells
Signature:
Month 10 Day 23 Year 12

INTL
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER
17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Jeremy Brandon
Signature: Jeremy Brandon
Month 10 Day 23 Year 12
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

DESIGNATED FACILITY
18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H134 2. 3. 4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Vicki Hoffauer
Signature:
Month 10 Day 23 Year 12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

APPENDIX 13

RW Anderson e-mail dictating mixing ratios for petroleum distillates and non-fuel wastes

(2 pages)

Robertson, David

From: Ryke Anderson <ryke.anderson@rykeanderson-inc.com>
Sent: Tuesday, September 02, 2014 2:13 PM
To: Cade Durio
Subject: COLLECTION APPROVAL REQUEST: PETROLEUM DISTILLATE, 09/03/2014 (WED)

Cade,

Please acknowledge Tubal-Cain Gas Free's approval of the below. RWA will issue PO upon approval.

1. RW Anderson, Inc. agrees to order material(s) listed below and to be collected from tanks/totes described for each load (per **Loading Summary** to be issued).

COLLECTION SCHEDULE:

Date:	**9/03/2014 (WED)**				
LOAD #:	TIME:	MATERIAL:	TANK(s):	UN/NA #:	Comments:
1	0800 (8am)	PETROLEUM DISTILLATE	B,C2,D	1268	***needs TCGF approval***
2	1000 (10am)	PETROLEUM DISTILLATE	B,C2,D	1268	***needs TCGF approval***
3					

2. **Petroleum Distillate Mixture/Hi Flash/Lo Flash** materials will meet the qualifications as is described below in **GREEN** and **BLUE**.
3. **Crude Oil** materials will meet the qualifications as is described below in **PURPLE.**
4. **Lube Oil** materials will meet the qualifications as is described below in **BROWN.**

TERMS:

a. NO OTHER MATERIALS, OR INVENTORY HOLDING(S), WILL BE DEEMED ACCEPTABLE FOR COLLECTION BY RW ANDERSON, INC - EXCEPT BY EXPRESSED WRITTEN APPROVAL FROM RWA AS AN ADDENDUM TO THIS "COLLECTION APPROVAL REQUEST".

b. PER SAID MATERIAL AND TANK IDENTIFICATION (ABOVE): MATERIAL WILL BE EXTRACTED FROM INVENTORY NOT TO EXCEED A REMAINDER 12 INCH HEEL WITHOUT WRITEN APPROVAL.

ONLY 400 GALLONS OF BENZENE MAY BE APPROVED FOR PLACEMENT IN LO-FLASH, OR MIXED (i.e.: COMBINATION OF HIFLASH AND LOFLASH), MATERIAL (and is acceptable to be drawn from Tote Container for loading to trailer)

PENDING RWA RE-APPROVAL: 500gal per FTL (MAX) Polar Material in LoFlash and/or Mixed ONLY.... (due to hygroscopic nature of methanol, ethanol, acetone and ketones - RWA will perform quick field test to indicate quality)

Overheads (i.e: LoFlash) general specifications:

- All constituents are pre-approved by RWA

Green

- *RVP, psi <7*
- *MON >80*
- *Sulfur, ppm <100*
- *Oxygenates % <10 (i.e.: alcohols, ethers, glycols)*
- *Gum, washed % <5*
- *Benzene % <4*
- *no free-phase water or debris*

Green

Bottoms (i.e.: HiFlash) general specs:

- API Gravity >25
- Ash % <0.05
- Sulfur % <0.5
- All constituents are pre-approved by RWA
- No free-phase water or debris

Blue

Crude Oil general specifications:

Total BS&W	**60% MAX**
Solids	**2% MAX**
Organic Chlorides	**5ppm MAX**
Sulfur	**0.5% MAX**
Oxygenates	**none**
Vanadium	**none**

Purple

Lube Oil general specifications:

Moisture	**less than 2000ppm**
Color	**less than Color Standard (approximately "brown tea-colored")**
Odor	**mild (or, less) and NOT aromatic**

Red

Ryke Anderson

RW ANDERSON, INC
PO Box 82415
Lafayette, LA 70598

337-296-2033 office
337-857-6993 fax
337-304-5672 cell

Notice: This is a private and confidential communication for the intended recipient only. If you are not the intended recipient, immediately notify the sender, and delete and destroy all copies of this communication. The unauthorized disclosure, dissemination, copying, or use of information contained herein may violate local, state, provincial, or national laws, rules, and regulations.

APPENDIX 14

Record of material loading for crude oil mixed with MEK

(5 pages)

Page 1 – Loading record showing high flash distillate, low flash distillate, crude oil and MEK all loaded into truck

Page 2 – Cleaning record of trailer prior to loading

Pages 3-5 – Bill of Ladings and scale information for the above load. Neither indicate the presence of MEK

RW Anderson - Record of Material Loading

Collection: Petroleum Distillate

BOL: 50109

DATE: 9-24-12 | Gate Appointment: 11:00 | Actual Arrival Time: 10:13

Transporter Company: Integrit | Load No: 3 | No of Loads Today: 4

Trailer No: 7041 | Truck No: 841

TRAILER — PRE-LOAD

RWA Visual Trailer Inspection - Clean?: YES NO N/A
Clean Ticket number: 20018418 NO N/A
Prior Material Hauled:

Checked for Water in Valves: YES NO N/A
SarGel of trailer before loading: YES NO N/A
Is trailer DOT compliant?: YES NO
Is transporter equipment compliant to TOS?: YES NO
Empty Weight Scale Ticket: YES NO ... Empty Wt(#): 31,660
40' of 3" hose, connections, working pump: YES NO
Water Present: YES NO
Water level (inches): 0
Number of Hoses required for Trailer to TCGF Tank: 0

Pass Inspection: YES NO

Comments:

TANK

12inch "U" filter Connection used? YES NO

#1 Material being loaded: High Flash
Tank No.: D S.G.: .90 Density (#/gal): 7.5 Material Color (1-5): 3
SarGel of Frac tank before loading (inches): 11 Material Clarity (1-5): 3
Initial Tank Strapping from Bottom to Surface (inches): 20 Gallons: Material Moisture (For FP > 200 F°):
Tank Strapping After Loading to Transport (inches): 15 Gallons:
Estimated Gallons Loaded:

#2 Material being loaded: Low Flash
Tank No.: B S.G.: .81 Density (#/gal): 6.8 Material Color (1-5): 2
SarGel of Frac tank before loading (inches): 6 Material Clarity (1-5): 2
Initial Tank Strapping from Bottom to Surface (inches): 37 Gallons:
Tank Strapping After Loading to Transport (inches): 12 Gallons:
Estimated Gallons Loaded:

#3 Material being loaded: Crude 1000 gal 500 gal MEK Material Color (1-5):
Quantity of Totes: Volume per Tote: Tank No.: S.G.: Density (#/gal): Material Clarity (1-5):

Column sample retained from loaded trailer?: YES NO
Moisture of Retain (ppm): N/A (MAX = 2000 ppm)
Material Color* (1-5): 3
Material Clarity** (1-5): 3

More than one free-phase layer: YES NO
Milky appearance: YES NO
Particulates observed in column or settled (light test): YES NO
Discuss with RWA if any are answered "YES"

PREMIUM CANDIDATE REQUIRED:

	LoFlash	Lube
* Color =	2 MAX	4 MAX
** Clarity =	1 MAX	n/a

KEEP A COLUMN SAMPLE RETAIN of the material loaded onto the trailer immediately after loading (so it is well mixed). Place the sample in a Ziploc bag and label with: (1) material's name; (2) date; (3) BOL

ALLOW LOAD TO SETTLE IN TRAILER FOR 15 MINUTES - OPEN VALVES AND TEST WITH SARGEL

TRAILER — POST-LOAD

Use the Truck Driver's Strapping Chart:
#1 Strapping of Trailer after loading (inches): 57 3/4 Gallons: 6547
#2 Strapping of Trailer after loading (inches): Gallons:
#3 Strapping of Trailer after loading (inches): Gallons:

Measured Specific Gravity (from Truck Retain): .83 (MAX = 0.90) Density (#/gal): 6.9 (MAX = 7.5 #/gal)
Est. Trailer Loaded Weight (lbs): 45,174

SarGel of trailer after loading (circle one): YES NO
All water removed (circle one): YES NO N/A
Water level (inches): 0

Load Time - Start: 12:00 TOP Seal No: 00018623
Load Time - Complete: 2:20 BOTTOM Seal No: 00018627
Departure Time: 2:55

Comments:

WA Representative (signature): (print): Brenden Bart
Shipper (signature): (print): Thomas Thul
Transport Driver (signature): (print): WILFRIED ABREU

RETURN SIGNED RML TO RWA OFFICE

FOR OFFICE USE
Received by: Candidate for Premium Value: Yes No n/a Premium Qualified: Yes No n/a
Date: If "NO", explanation: If "NO", explanation:
Possible deduction: Yes- Why? No

(337) 281-9158 cellular
(337) 296-2033 main
(337) 857-6993 fax

RW Anderson, Inc
PO Box 82415
Lafayette, LA 70518

Tubal Cain Gas Free Services
Port Arthur, Texas

®DANA CONTAINER, INC.

CLEANING DIVISION
P.O. BOX 150
AVENEL, N.J. 07001
732-750-9100

- ☐ AVENEL
- ☐ BALTIMORE
- ☐ CHARLOTTE
- ☐ DETROIT
- ☐ HAMMOND
- ☐ LA PORTE
- ☐ NITRO
- ☐ PAULSBORO
- ☐ SUMMIT
- ☐ CRESTWOOD

2001848 TXR000080426

PO #: 165719

TRACTOR:

TRAILER: 7041 (type)

DROP-OFF DRIVER:

DATE: 9 23 14

CUSTOMER: Integrity

ADDRESS:

SERVICES	PRODUCT HAULED	WORK ORDERED	WORK PERFORMED	TIME	RATE	CHARGE
Comp I:	Tulol	03	03			
Comp II:	Cutter					
Comp III:						
Comp IV:						
Comp V:						
Pump:						
Hoses:						
Heel:						

Waste Treatment Surcharge:

Sub-Total	$
Sales Tax	$
Total	$

Term. Sup. Approved

P/U Driver: DATE:

WORK CODE:

01 Steam & Dry
02 Rinse, Steam & Dry
03 Detergent Wash & Dry
04 Solvent Flush
05 Caustic Wash & Dry
06 Air Dry
07 Dry Bulk Trailer
08 External Trailer Wash
09 External Tractor Wash
10 Valve Pack
11 Steam Internally
12 Steam Coils
13 Pump w/Trailer
14 Pump w/out Trailer
15 Hoses
16 Hand Labor - 2 Men
17 Product Residue
18 Extras

Tubal Cain Gas Free Services
Port Arthur, Texas

Interguif Driver Confirmation / Time Log

Print Date : 8/23/2014
TXR000080426

INTERGULF CORPORATION

Driver Name : Wilfrido Abreu
Vessel / Tank: **7041**

Load No
165864

Pick up Information

Generator Name : RW Anderson, Inc.
Date of Load : 08/23/2014
Pick up Location : Tubal Cain Marine Service, 8700 Old Yacht Rd, Port Arthur 77
Time of Load : 11:00
Site Contact : Ryke Anderson 3273045672

Trucking Information

Carrier : Interguif Corporation
Type of Equipment : Tanker
Truck Number : 841
Trailer Number : 7041

Load Information

Material Code : Petroluem Dist.
Estimated Qty : 5000
Material Description : Mixture of Naptha, LCO, Kerosine, and Light Naptha from Sa
Manifest Type : Bill of Lading

Delivery Information Interguif Distillation - 8989 Highway 225 La Porte, TX 77571

Tank Number :
Delivery / Release Number : BOL # 501109
Wash Out : Before Load
Weight Ticket : Yes

Special Instructions

MUST GET LIGHT & HEAVY WEIGHTS
BOL # 501109

Pick up Time Log

Depart for Load : 08:45
Arrive at Location : 10:13
Start Pumping : 12:00
End Pumping : 14:20
Depart Facility : 14:35

Driver Notes :

Delivery Time Log

Arrive Delivery Location :
Start Pumping :
End Pumping :
Depart Delivery Facility :
Load Complete :

Driver Notes :

Weights Gross : Tare : Net :

Notes :

Driver Signature :
Generator Signature :
Manifest / TCEQ Number : 16534

74358050

TICKET NUMBER

Tubal Cain Gas Free Services
Port Arthur, Texas

THE CAT SCALE GUARANTEE

The CAT Scale Company guarantees that our scales will give an accurate weight. What makes us different from other scale companies is that we back up our guarantee with cash.©

CAT SCALE COLLECTOR CARD INSIDE!

"WEIGH WHAT WE SAY OR WE PAY"®

If you get an overweight fine from the state **AFTER** one of our CAT Scales showed a legal weight, we will immediately check our scale and we will:

(1) Reimburse you for the cost of the overweight fine if our scale is wrong, **OR**

(2) A representative of CAT Scale Company will appear in court **WITH** the driver as an expert witness if we believe our scale was correct.

IF YOU SHOULD GET AN OVERWEIGHT FINE, YOU SHOULD DO THE FOLLOWING TO GET THE PROBLEM RESOLVED:

1) Post bond and request a court date.
2) Call CAT Scale Company direct 24 hours a day at 1-877-CAT-SCALE, ext. 7 (Toll Free) or visit www.catscaleguarantee.com for instructions.
3) **IMMEDIATELY** send a copy of the citation, CAT Scale Ticket, your name, company, address, and phone number to CAT Scale Company Attn: Guarantee Department.

CERTIFIED AUTOMATED TRUCK SCALE

CAT SCALE COMPANY
P.O. BOX 630
WALCOTT, IA 52773
(563) 284-6263
www.catscale.com

* The four weights shown below are separate weights. The GROSS WEIGHT is the CERTIFIED WEIGHT and was weighed on a full length platform scale. All weights are guaranteed by CAT Scale.

DATE: [redacted]

APPROX TIME: [redacted] 3:15

SCALE LOCATION: 2054
LA PORTE TRAVEL PLAZA
9119 HWY 225
LA PORTE TX

74358050

PUBLIC WEIGHMASTER'S CERTIFICATE OF WEIGHT & MEASURE

STEER AXLE	10540 lb
DRIVE AXLE	12280 lb
TRAILER AXLE	8840 lb
* GROSS WEIGHT	31660 lb

This is to certify that the following merchandise was weighed, counted, or measured by a public weigher, and when properly signed shall be prima facia evidence of the accuracy of the weight shown as prescribed by law.

DEPARTMENT OF AGRICULTURE • TEXAS •

LICENSE#: 0610816

LIVESTOCK, PRODUCE, PROPERTY, COMMODITY, OR ARTICLE WEIGHED FREIGHT ALL KINDS

COMPANY INTERGULF U TRACTOR # 461 TRAILER # 7041

WEIGH NUMBER 8050

FEE $10.50

WEIGHER SIGNATURE AND LICENSE NUMBER ROSY #

FULL WEIGH TICKET # (IF REWEIGH)

DRIVER IN TRUCK UNLESS CHECKED HERE:

CUSTOMER COPY

© CAT Scale® TX 3052 06/14

TXR000080426

STRAIGHT BILL OF LADING - SHORT FORM

BOL: 501109

SHIPPING DATE	Wednesday, September 24, 2014		
CARRIER	Intergulf Transport	Truck #: 841	Trailer #: 7041
CONSIGNEE	Intergulf Corporation		
DESTINATION	LaPorte	STATE: TX	ZIP: 77572
ROUTE	8989 HWY 225 West	PHONE: 281-474-2810	
DELIVERING CARRIER	Intergulf Transport	CONTACT: Mike or Clint	

NO. PACKAGES	HAZARDOUS MATERIALS	DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS		WEIGHT (Subject to Correction)	RATE
1	1268	Petroleum Distillate	SEAL NUMBER(S):	~22 Tons	85
			1. 00018623		
		Petroleum Distillates, n.o.s. (Naphtha, Alkylate)	2. 00018634		
		UN/NA 1268 HC- 3 PG-2	3.		
		ERG-128	4.		

1. Driver WILL strap trailer to ensure effective load. Strapping: 57 3/4 (inches) 6542 (Gals)
2. Driver WILL ensure supplier sign BOL at loading. Driver WILL ensure receiver signs BOL. Driver WILL issue signed copies of BOL to Supplier and Receiver.
3. Transporter WILL provide loading pump
4. Driver MUST arrive to collection with EMPTY WEIGHT SCALE TICKET - or, will be refused entry.

REFER TO "TERMS OF SERVICE" PROVIDED. TRANSPORTER WILL BE RESPONSIBLE FOR COMPLIANCE TO THESE TERMS.

LOAD TIME AT 11:00AM

SHIPPER Tubal-Cain Gas Free
8700 Old Yacht Club Road
Port Arthur TX 77642
(409) 962-8800
Cade Durio

SHIPPER'S CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SIGNATURE:

DRIVER'S CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SIGNATURE:

RECEIVER'S CERTIFICATION: Receiver states that product matches receiver's order and is in good condition, hose connections are proper and sufficient space is available for delivery.

SIGNATURE:

RW Anderson, Inc
102 Innisbrook Drive Broussard, LA 70518
(337) 296-2033

Shipper, Per Tubal-Cain Gas Free

Agent, Per RW Anderson, Inc

Tubal Cain Gas Free Services
Port Arthur, Texas

APPENDIX 15

Annual Waste Summary from 2011-2013

(8 pages)

TC GF6

REGISTRATION AND REPORTING SECTION, MC 129
PERMITTING AND REGISTRATION SUPPORT DIVISION
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087 TELEPHONE: (512) 239-6413

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE REGISTRATION #: 90733

REPORT YEAR: 2011

TXR000080426

COMPANY NAME AND ADDRESS
TUBAL CAIN GAS FREE SERVICES
8700 A OLD YACHT CLUB RD
PORT ARTHUR, TX 77642

☐ NO REPORT REQUIRED
(See 30 TAC 335.9(a)(3); also see instructions)

☒ ORIGINAL SUMMARY
☐ REVISED SUMMARY
☐ SUPPLEMENTAL SUMMARY

GENERATOR COMPANY NAME IF DIFFERENT FROM ABOVE

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS
0009206H	D001	D018				40940.00	P

WMC: Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
Z14600.00	P	H 039		50052	TXD069452340	
19480.00	P	H 039		50052	TXD069452340	
		H				

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS

WMC: Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
		H				
		H				
		H				

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

COMPANY AUTHORIZED AGENT: RANDY COOPER

SIGNATURE OF COMPANY AUTHORIZED AGENT

SIGNATURE DATE

PHONE NUMBER ( )

TITLE: OPERATIONS MANAGER

Did this facility generate 1.1 tons or more of hazardous waste in any one month of the report year? Yes ☒ No ☐

Did this facility generate 2.2 lbs or more of acute hazardous waste in any one month of the report year? Yes ☐ No ☒

Tubal Cain Gas Free Services
Port Arthur, Texas

RMITTING AND REGISTRATION SUPPORT DIVISION
XAS COMMISSION ON ENVIRONMENTAL QUALITY
. BOX 13087
STIN, TEXAS 78711-3087 TELEPHONE: (512) 239-6413

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE REGISTRATION #: 90733

REPORT YEAR: 2012

TCGF6

MPANY NAME AND ADDRESS

Tubal-Cain Gas Free Services
8700 A Old Yacht Club Rd
Port Arthur, TX 77642

TXD000704421

☐ NO REPORT REQUIRED
(See 30 TAC 335.9(a)(3); also see instructions)

☒ ORIGINAL SUMMARY Page 1 of 2
☐ REVISED SUMMARY
☐ SUPPLEMENTAL SUMMARY

NERATOR COMPANY NAME IF DIFFERENT FROM ABOVE

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS
0007110H	D001	D002			Caustic aqueous waste	47313	P

WMC: Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
17742	P	H 081		39068	TXR000031288	
29571	P	H 081		39068	TXR000031288	
		H				

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS
)009206H	D001	D018			Barge cleaning - waste oil	*50080	P

WMC: Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
20920	P	H 039		78380	TXD069452340	
14320	P	H 039		78380	TXD069452340	
		H				* Additional quantities on page 2 of 2

Tubal Cain Gas Free Services
Port Arthur, Texas

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

MPANY AUTHORIZED AGENT: Andy Cooper

SIGNATURE OF COMPANY AUTHORIZED AGENT

SIGNATURE DATE

PHONE NUMBER ( )

TLE: Operations Manager

Did this facility generate 1.1 tons or more of hazardous waste in any one month of the report year? Yes ☒ No ☐

Did this facility generate 2.2 lbs or more of acute hazardous waste in any one month of the report year? Yes ☐ No ☒

RMITTING AND REGISTRATION SUPPORT DIVISION
XAS COMMISSION ON ENVIRONMENTAL QUALITY
. BOX 13087
STIN, TEXAS 78711-3087 TELEPHONE: (512) 239-6413

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE REGISTRATION #: 90733

REPORT YEAR: 2012

MPANY NAME AND ADDRESS

Tubal-Cain Gas Free Services
8800 A Old Yacht Club Rd
Port Arthur, TX 77642

TXR000080042

☐ NO REPORT REQUIRED
(See 30 TAC 335.9(a)(3); also see instructions)

☒ ORIGINAL SUMMARY Page 2 of 2
☐ REVISED SUMMARY
☐ SUPPLEMENTAL SUMMARY

NERATOR COMPANY NAME IF DIFFERENT FROM ABOVE

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS
)009206H	D001	D018			Barge cleaning - waste oil	*50080	P

WMC: Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
14840	P	H039		78380	TXD069452340	* Additionaly quantities on page 1 of 2
21360	P	H039		78380	TXD069452340	
18420	P	H039		78380	TXD069452340	

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS

WMC: Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
		H				
		H				
		H				

Tubal Cain Gas Free Services
Port Arthur, Texas

ertify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible obtaining the information, I believe that the submitted information is true, accurate, and complete.

)MPANY AUTHORIZED AGENT: Andy Cooper

SIGNATURE OF COMPANY AUTHORIZED AGENT

SIGNATURE DATE

PHONE NUMBER ( )

TLE: Operation Manager

Did this facility generate 1.1 tons or more of hazardous waste in any one month of the report year? Yes ☒ No ☐

Did this facility generate 2.2 lbs or more of acute hazardous waste in any one month of the report year? Yes ☐ No ☒

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Industrial and Hazardous Waste
Annual Waste Summary Error Resolution Letter

June 26, 2013

RANDY COOPER
TUBAL-CAIN GAS FREE SERVICES INC
PO BOX 2364
BEAUMONT, TX 77704 2364

Re: SWR# 90733
TUBAL-CAIN GAS FREE SERVICES
8700A OLD YACHT CLUB RD, PORT ARTHUR, TX 77642

Dear Generator:

Thank you for submitting your 2012 Annual Waste Summary. A review of your submission indicates invalid information that needs to be resolved. Please see the attached report that lists the data to be corrected. The report is listed in Texas Waste Code (TWC) order which shows the information received from your site. Below each TWC record is a list of errors which describe the missing or invalid data. To the right of each error item there is an area labeled "Correction" with space for you to provide the correct data. There could be one or more errors for each TWC listed. Multiple errors are listed separately and space is provided to correct each.

Please return the attached error report with your corrections within two weeks from the receipt of this letter to the following address:

Texas Commission On Environmental Quality
Registration and Reporting Section, MC 129
PO Box 13087
Austin, TX 78711-3087

If you have questions regarding the errors on your Annual Waste Summary, please contact the Industrial and Hazardous Waste Registration Team at 512-239-6413.

Date: 6/26/2013
Site: TUBAL-CAIN GAS FREE SERVICE
Page: 1

Texas Commission on Environmental Quality
Industrial and Hazardous Waste
Annual Waste Summary Error Resolution Letter

SWR: 90733
Report Year: 2012

TXR000080426

Texas Waste Cd	EPA Codes	Total Quantity Generated/Units	Total Quantity Handled/Units	Facility Num	Facility Rcvr EPA ID	Sys Type	Fee Exmt	WM Code	Rpt Meth	Record ID
0009206H	D001	50080.0000 P	89860.0000 P	78380	TXD069452340	039		X	P	10147394
Errors:	Receiver's EPA ID: Inconsistent with Tx Registration No.					Correction:				
0007110H	D001 D002	47313.0000 P	47313.0000 P	TXR00		081		X	P	10147393
Errors:	Facility Number: Invalid					Correction:				
	Receiver's EPA ID: Missing					Correction:				

Company Authorized Agent Printed Name: _____

Company Authorized Agent Signature: _____

Date: _____ Telephone: _____

Tubal Cain Gas Free Services
Port Arthur, Texas

Date: 6/26/2013
Site: TUBAL-CAIN GAS FREE SERVICE
Page: 1

Texas Commission on Environmental Quality
Industrial and Hazardous Waste
Annual Waste Summary Error Resolution Letter

SWR: 90733
Report Year: 2012

TXR000080426

Texas Waste Cd	EPA Codes	Total Quantity Generated/Units	Total Quantity Handled/Units	Facility Num	Facility Rcvr EPA ID	Sys Type	Fee Exmt	WM Code	Rpt Meth	Record ID
0009206H	D001	50080.0000 P	89860.0000 P	78380	TXD069452340	039		X	P	10147394
Errors:	Receiver's EPA ID: Inconsistent with Tx Registration No.					Correction:	50052			
0007110H	D001 D002	47313.0000 P	47313.0000 P	TXR00		081		X	P	10147393
Errors:	Facility Number: Invalid					Correction:	39068			
	Receiver's EPA ID: Missing					Correction:	TXR000031286			

Company Authorized Agent Printed Name: _____

Company Authorized Agent Signature: _____

Date: _____ Telephone: _____

Tubal Cain Gas Free Services
Port Arthur, Texas

RMITTING AND REGISTRATION SUPPORT DIVISION
XAS COMMISSION ON ENVIRONMENTAL QUALITY
, BOX 13087
STIN, TEXAS 78711-3087 TELEPHONE: (512) 239-6413

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE REGISTRATION #: 90733

REPORT YEAR: 2013 TCGF6

MPANY NAME AND ADDRESS

Tubal-Cain Gas Free Services
8000A Old Yacht Club Rd
Port Arthur, TX 77642

TXR000030422

☐ NO REPORT REQUIRED
(See 30 TAC 335.9(a)(3); also see instructions)

☐ ORIGINAL SUMMARY
☒ REVISED SUMMARY PAGE 1 OF 2
☐ SUPPLEMENTAL SUMMARY

NERATOR COMPANY NAME IF DIFFERENT FROM ABOVE

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS
0009206H	D001	D018			Barge cleaning waste oil	10872	P

WMC: Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
4000	P	H141		30271	TXD074196338	PHILIP SERVICES CORP.
6872	P	H061		50207	TXD010791184	LONESTAR ECOLOGY LLC
		H				

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS
0014119H	D001				Barge cleaning oil/chloroform	162681	P

WMC: Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
162681	P	H061		50207	TXD010791184	LONESTAR ECOLOGY LLC
		H				
		H				

Tubal Cain Gas Free Services
Port Arthur, Texas

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible obtaining the information, I believe that the submitted information is true, accurate, and complete.

OMPANY AUTHORIZED AGENT: ANDY COOPER

SIGNATURE OF COMPANY AUTHORIZED AGENT

SIGNATURE DATE

PHONE NUMBER ( )

TLE: OPERATIONS MANAGER

	Yes	No
Did this facility generate 1.1 tons or more of hazardous waste in any one month of the report year?	X	
Did this facility generate 2.2 lbs or more of acute hazardous waste in any one month of the report year?		X

RMITTING AND REGISTRATION SUPPORT DIVISION
XAS COMMISSION ON ENVIRONMENTAL QUALITY
. BOX 13087
STIN, TEXAS 78711-3087 TELEPHONE: (512) 239-6413

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE REGISTRATION #: 90733

REPORT YEAR: 2013

MPANY NAME AND ADDRESS

Tubal-Cain Gas Free Services
8000A Old Yacht Club Rd
Port Arthur, TX 77642

TXR000030426

☐ NO REPORT REQUIRED
(See 30 TAC 335.9(a)(3); also see instructions)

☐ ORIGINAL SUMMARY
☒ REVISED SUMMARY PAGE 2 OF 2
☐ SUPPLEMENTAL SUMMARY

NERATOR COMPANY NAME IF DIFFERENT FROM ABOVE

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS
00053071					Barge cleaning solids	266940	P

WMC: ☐ Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
235040	P	H132		H1539	H1539	SEABREEZE ENVIRONMENTAL LANDFILL
31900	P	H132		H2242	TXR000079853	NEWTON COUNTY LANDFILL
		H				

TEXAS WASTE CODE	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	EPA HAZARDOUS WASTE NO.	WASTE DESCRIPTION	TOTAL QUANTITY GENERATED	UNITS
00082051					Barge cleaning oil/water mix	76460	P

WMC: ☐ Waste Minimization Comment:

QUANTITY HANDLED	UNITS	SYS TYPE CODE	FEE	FACILITY NUMBER	RECEIVER'S EPA ID	COMMENTS
46460	P	H132		H2242	TXR000079853	NEWTON COUNTY LANDFILL
30000	P	H134		39098	TXR000036731	BIG HILL INJECTION
		H				

Tubal Cain Gas Free Services
Port Arthur, Texas

ertify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible obtaining the information, I believe that the submitted information is true, accurate, and complete.

OMPANY AUTHORIZED AGENT: ANDY COOPER

SIGNATURE OF COMPANY AUTHORIZED AGENT

SIGNATURE DATE

PHONE NUMBER ( )

TLE: OPERATIONS MANAGER

Did this facility generate 1.1 tons or more of hazardous waste in any one month of the report year? Yes ☒ No ☐

Did this facility generate 2.2 lbs or more of acute hazardous waste in any one month of the report year? Yes ☐ No ☒

APPENDIX 16

TCEQ Notice of Registration

(7 pages)

*** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ***
Notice of Registration
Industrial and Hazardous Waste

90733 TUBAL-CAIN GAS FREE SERVICES

Solid Waste Registration Number: 90733 **EPA Id:** TXR000080426

Company Name: TUBAL-CAIN GAS FREE SERVICES INC
Site Name: TUBAL-CAIN GAS FREE SERVICES
Site Location:
Primary Contact: COOPER, RANDY
Mailing Address: PO BOX 2364
BEAUMONT, TX 77704-2364

Region: 10
County: 123 JEFFERSON
Land Type: Private
Title:
Site Street Address: 8700A OLD YACHT CLUB RD
PORT ARTHUR, TX 77642

Initial Registration Date: 09/29/2011
Last Amendment Date: 10/27/2014
Last Date NOR Computer update: 12/16/2014
Phone: 409-962-8800

Registration Status: Active
Registration Type: Generator
Generator Type: Industrial
Receiver Type:
Transporter Type:
Transport Wst Class:

Reporting Method: PAPER
Hazardous Waste Generation Status: Large Quantity Generator

Universal Waste Activity:
Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more): No
Type(s) Managed:
Destination Facility for Universal Waste: No

NAICS Code: 488320 Marine Cargo Handling
Tax Identification #: 32043275729
Handler Status:

Operator Information

Name: TUBAL-CAIN GAS FREE SERVICES INC
Phone: 409-962-8800
Address: PO BOX 2364
BEAUMONT, TX 77704-2364

Owner Information:

Name: TUBAL-CAIN GAS FREE SERVICES INC
Phone: 409-962-8800
Address: PO BOX 2364
BEAUMONT, TX 77704-2364

Billing Contact:
Billing Address:
PO BOX 2364
BEAUMONT, TX 77704-2364

Title:

Phone: 409-962-8800

Other Contact: Manager, Environmental
Mailing Address: PO BOX 2364
BEAUMONT, TX 77704-2364

Role: IHW: Owner Contact

Phone: 409-962-8800

As of 10/27/2014 - The next unassigned sequence number for WASTES is 0021 and
The next unassigned sequence number for UNITS is 004

90733 TUBAL-CAIN GAS FREE SERVICES

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
****** Active Wastes ******						
00019992	2	Active	10/27/2014	On & Off	No	No

Description from Generator: PLANT REFUSE
Texas Form Code: 999 Class 2 plant trash
Origin Code: 1 Generated on-site from a product process or service activity
Current Management Units: Container storage area 001

00022061	1	Active	10/27/2014	On-site	No	No

Description from Generator: EQUIPMENT OIL CHANGES AND SPILL CLEANUP
Texas Form Code: 206 Waste oil
Origin Code: 1 Generated on-site from a product process or service activity
Current Management Units: Miscellaneous storage containers 003

00033102	2	Active	10/27/2014	On-site	No	No

Description from Generator: EQUIPMENT OIL FILTER CHANGES
Texas Form Code: 310 Spent solid filters or adsorbents
Origin Code: 1 Generated on-site from a product process or service activity
Current Management Units: Miscellaneous storage containers 003

00043012	2	Active	10/27/2014	On-site	No	No

Description from Generator: SOILS CONTAINING SPILLED PETROLEUM PRODUCTS
Texas Form Code: 301 Soil contaminated with organics
Origin Code: 2 Result of spill clean-up, equipment decommissioning or emergency removal
Current Management Units: Container storage area 001

00053071	1	Active	10/27/2014	On-site	No	No

Description from Generator: BARGE CLEANING RUST, SCALE & SCRAP CONTAINING HYDROCARBON PRODUCTS
Texas Form Code: 307 Metal scale, filings or scrap
Origin Code: 1 Generated on-site from a product process or service activity
Current Management Units: Container storage area 001

90733 TUBAL-CAIN GAS FREE SERVICES

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
****** Active Wastes ******						
0006204H	H	Active	10/27/2014	On-site	No	No

Description from Generator: BARGE CLEANING CONTAINING HALOGENATED/NON-HALOGENATED SOLVENT MIXTURE
Texas Form Code: 204 Halogenated/non-halogenated solvent mixture
EPA Form Code: W204 Concentrated halogenated/ non-halogenated solvent mixture
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488320 Marine Cargo Handling
EPA Hazardous Waste Numbers: D001
Current Management Units: Container storage area 002

0007110H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: BARGE CLEANING CONTAINING CAUSTIC AQUEOUS WASTE
Texas Form Code: 110 Caustic aqueous waste
EPA Form Code: W110 Caustic aqueous waste without cyanides
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D002
Current Management Units: Container storage area 002

00082051	1	Active	10/27/2014	On & Off	No	No

Description from Generator: Barge cleaning containing oil-water mixture.
Texas Form Code: 205 Oil-water emulsion or mixture
Origin Code: 1 Generated on-site from a product process or service activity
Company's Internal Code(s): 00082051
Current Management Units: Container storage area 002

0009206H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: BARGE CLEANING OF WASTE OIL
Texas Form Code: 206 Waste oil
EPA Form Code: W206 Waste oil
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001 D018
Current Management Units: Container storage area 002

90733 TUBAL-CAIN GAS FREE SERVICES

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
****** Active Wastes ******						
0010207H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: BARGE CLEANING RINSE/WASH WATER FROM PETROLEUM SOURCE AND ETHANOL
Texas Form Code: 207 Concentrated aqueous solution of other organics
EPA Form Code: W113 Other aqueous waste or wastewaters
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001
Current Management Units: Container storage area 002

0011101H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: BARGE CLEANING RINSE/WASH WATER FROM PETROLEUM SOURCE (AQUEOUS WASTE WITH LOW SOLVENTS)
Texas Form Code: 101 Aqueous waste with low solvents
EPA Form Code: W101 Very dilute aqueous waste containing more than 99% water
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G13 Cleaning out process equipment
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001
Current Management Units: Container storage area 002

0012205H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: BARGE CLEANING RINSE/WASH WATER EMULSION FROM PETROLEUM SOURCE (OIL-WATER EMULSION OR MIXTURE)
Texas Form Code: 205 Oil-water emulsion or mixture
EPA Form Code: W205 Oil-water emulsion or mixture
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G13 Cleaning out process equipment
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001
Current Management Units: Container storage area 002

00133012	2	Active	10/27/2014	On & Off	No	No

Description from Generator: BARGE CLEANING RINSE/WASH WATER EMULSION FROM PETROLEUM SOURCE (OIL-WATER EMULSION OR MIXTURE)
Texas Form Code: 301 Soil contaminated with organics
Origin Code: 1 Generated on-site from a product process or service activity
Current Management Units: Container storage area 001

90733 TUBAL-CAIN GAS FREE SERVICES

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
****** Active Wastes ******						
0014119H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: BARGE CLEANING RINSE/WASH WATER EMULSION FROM PETROLEUM SOURCE CONTAINING CHLOROFORM
Texas Form Code: 119 Other inorganic liquids
EPA Form Code: W113 Other aqueous waste or wastewaters
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G13 Cleaning out process equipment
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001
Current Management Units: Container storage area 002

0015603H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: Oily vessel wash containing benzene
Texas Form Code: 603 Oily sludge
EPA Form Code: W603 Oily sludge
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001 D018
Current Management Units: Container storage area 002

0016609H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: Vinyl acetate heel
Texas Form Code: 609 Other organic sludges
EPA Form Code: W609 Other organic sludge
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001
Current Management Units: Container storage area 002

0017609H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: Acrylic acid heel
Texas Form Code: 609 Other organic sludges
EPA Form Code: W609 Other organic sludge
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001 D002
Current Management Units: Container storage area 002

90733 TUBAL-CAIN GAS FREE SERVICES

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
****** Active Wastes ******						
0018609H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: Tetrachloroethylene heel
Texas Form Code: 609 Other organic sludges
EPA Form Code: W609 Other organic sludge
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D039
Current Management Units: Container storage area 002

0019489H	H	Active	10/27/2014	On & Off	No	No

Description from Generator: OILY SOLIDS FROM BARGE CLEANING CONTAINING BENZENE
Texas Form Code: 489 Petroleum contaminated solids
EPA Form Code: W409 Other organic solids
Origin Code: 1 Generated on-site from a product process or service activity
Source Code: G09 Other production or service-related processes
NAICS Code: 488310 Port and Harbor Operations
EPA Hazardous Waste Numbers: D001 D018
Current Management Units: Container storage area 002

00204891	1	Active	10/27/2014	On & Off	No	No

Description from Generator: OILY TRASH
Texas Form Code: 489 Petroleum contaminated solids
Origin Code: 1 Generated on-site from a product process or service activity
Current Management Units: Container storage area 001

As of 10/27/2014, The next unassigned sequence number for WASTES is 0021

90733 TUBAL-CAIN GAS FREE SERVICES

**** UNITS AT THIS SITE MANAGING WASTE ****

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
001	Container storage area	ACTIVE	09/29/2011	1 / NA	NA	NA	05 Non-Hazardous Regulated	YES /

Description from Company: COMMERCIAL CONTAINER STORAGE
System Types: 141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.
Wastes Currently Managed at Unit: 00133012 BARGE CLEANING, 00053071 BARGE CLEANING, 00204891 OILY TRASH, 00043012 SOILS CONTAINING, 00019992 PLANT REFUSE

003	Miscellaneous storage containers	ACTIVE	09/29/2011	12 / NA	NA	NA	05 Non-Hazardous Regulated	YES /

Description from Company: DRUM STORAGE
System Types: 141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.
Wastes Currently Managed at Unit: 00033102 EQUIPMENT OIL, 00022061 EQUIPMENT OIL

002	Container storage area	ACTIVE	09/29/2011	NA / N	NA	NA	03 RCRA Permit Exempt<90 Day Storage	YES /

Description from Company: FRAC CONTAINER STORAGE
System Types: 141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.
Wastes Currently Managed at Unit: 0011101H BARGE CLEANING, 0014119H BARGE CLEANING, 0007110H BARGE CLEANING, 00082051 Barge cleaning containing, 0017609H Acrylic acid heel, 0010207H BARGE CLEANING, 0009206H BARGE CLEANING OF, 0012205H BARGE CLEANING, 0018609H Tetrachloroethylene heel, 0016609H Vinyl acetate heel, 0015603H Oily vessel wash, 0006204H BARGE CLEANING, 0019489H OILY SOLIDS FROM

As of 10/27/2014, The next unassigned sequence number for UNITS is 004