

Attachment #1
INDUSTRIAL HAZARD WASTE
FOLDER LEVEL

WST IHW #: 30664

File Type: CORRESPONDENCE

Volume: 001

Inclusive Dates: 1/1/2005 - 12/31/2006

Media Code/ Form

- Microfiche
- Roll Microfilm
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IHW 30664 CO

*** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ***
Industrial and Hazardous Waste
NOR2 Load Success Report

04/18/2006

Data Set: 041806

TCEQ-ID	File	Wst/Unit	New Data	Old Data	Type of Change
30664	N1	30664	MARRERO, RAYMOND, DIRECTOR OF OPERATIONS	, KEITH, HADDOCK,	Steers Contact Name Change
30664	N1	30664	, 2121, MURPHY, W, ST, , , ODESSA, TX, 79763-	, 11490, WESTHEIMER, , , SUITE 1000, HOUSTON TX, 77077-	Steers Contact Address
30664	N1	30664	432-332-0903	281-721-4200	Steers Contact Phone Change
30664	N1	30664	432-332-3053		Steers Contact Fax Number Change
30664	N1	30664	[REDACTED]		Steers Contact Email Change
30664	N1	30664	, , DIRECTOR OF OPERATIONS,	, Plant Manager	Facility Contact Name Change
30664	N1	30664	432-332-3053		Facility Contact Fax Number Change
30664	N1	30664	[REDACTED]		Facility Contact Email Change
30664	N3	001	00113902		Waste currently managed, Added
30664	N3	001	00123902		Waste currently managed, Added
30664	N3	001	132		System Type Code added
30664	N4	001			Unit Desc Replaced-Only Old Shown
30664			***** End of Success *****		

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IHW 30664 CO

*** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ***
Industrial and Hazardous Waste
NOR2 Load Success Report

03/07/2006

Data Set: 030706

TCEQ-ID	File	Wst/Unit	New Data	Old Data	Type of Change
30664	N1	30664	CESQG	SQG	Hazardous Waste Generator Status
30664	N2	0004203H	Inactive	Active	Waste Status Changed
30664	N2	00052051	Inactive	Active	Waste Status Changed
30664	N2	0501203H	Inactive	Active	Waste Status Changed
30664	N2	05023081	Inactive	Active	Waste Status Changed
30664	N2	0800490H	Inactive	Active	Waste Status Changed
30664	N4	0004203H	WASTE METHYL ETHEL KEYTONE		Wst Desc Replaced-Only Old Shown
30664	N4	00052051	WASTE SOLVENT-PETROLEUM OIL		Wst Desc Replaced-Only Old Shown
30664	N4	0501203H	SPENT SOLVENT		Wst Desc Replaced-Only Old Shown
30664	N4	05023081	empty 5 gallon pail of Epoxy-crushed		Wst Desc Replaced-Only Old Shown
30664	N4	0800490H	Abrasive blast media.		Wst Desc Replaced-Only Old Shown
30664		*****	End of Success *****		

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717
1-31-06
TB

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IHW <u>30664</u>	CO

Notification For Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400). You may copy this section as needed for each waste stream at your site.

Part II. Waste Stream Notification

Section A. Notification Type and Registration Numbers

If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.

1. Notification type (check one): Initial Update

2. Solid Waste Registration Number: 30664

3. EPA Identification Number: TX D041404252

4. Customer Reference Number: CN _____

5. Regulated Entity Number: RN _____

6. Company Name: Perman Enterprises

7. Site Name: same

Section B. Waste Stream Information

1. Texas Waste Code: 1685
Sequence Number

603
Texas Form Code
(See Appendix B)

H 1 2 3
Class Code
(Circle Class Code)

2. Waste Description and Generating Process:
Dirt/Oil Sludge

3. Date of Generation: ____/____/____
Month Day Year

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4. Origin Code (check one):

- 1. The waste was generated on-site from a product process or service activity.
- 2. The waste resulted from a spill clean-up, equipment decommissioning, or emergency removal by company.
- 3. The waste was derived from the on-site management of a non-hazardous waste.
- 4. The waste was received from off-site and was not recycled or treated on-site.
- 5. The waste was residual from the on-site treatment, disposal or recycling of previously existing hazardous waste.
- 6. The waste was from a state, federal, or locally funded cleanup.
- 7. The waste was from a corrective action or closure.

5. New Chemical Substance: Yes No

If you check "yes" and the waste is Class 2 or Class 3, attach copies of all information, documentation and rationale used to classify the waste.

6. Waste Management Location (check all that apply): On-site Off-site

Provide the 3-digit waste management unit sequence number for any ON-SITE waste management units where this waste is treated, stored or disposed. If the waste management unit is new, leave blank, and include waste stream in Part III Waste Management Unit Notification, question 9.

7. If this waste is recycled, see TCEQ Form 0525 "Generator Notification Form for Recycling Hazardous or Industrial Waste".

Received

TCEQ-00002 (Rev. 4-25-2005)
JAN 09 2006

Page 1 of 2

Reporting Section

TB
UH
1/10/06

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Please provide the 8-digit Texas Waste Code from Item 1 of Section B of the previous page:
1 6 8 5 0 0 3 1

If this waste is non-hazardous, skip Questions 8-13 and go to Section C. Certification of Waste Stream Information

8. EPA Hazardous Waste Numbers (EPA Codes): N/A

9. NAICS Code:

10. Source Code (See Appendix C): G

11. Mixed Radioactive Waste: Yes No

12. System Type Code (See Appendix D): H
*Only fill out System Type Code if you selected Origin Code 5 from the previous page.

13. EPA Form Code (See Appendix E): W

Section C. Certification of Waste Stream Information

I certify that the information submitted herein is complete and accurate to the best of my knowledge.

<u>S Palma</u> Printed Preparer's Name	<u>332-0904</u> Telephone Number
<u>Saul Palma</u> Preparer's Name	<u>12-28-05</u> Date

Kathleen Hartnett White, *Chair*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



ihw/sob64/w

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 6, 2006

Raymond Marrero
Permian Enterprises
2121 W Murphy
Odessa, TX 79763

Re: Permian Enterprises
Solid Waste Registration Number: 30664
Texas Waste Code: 00133082

Dear Raymond Marrero:

The Texas Commission on Environmental Quality (TCEQ) would like to thank you for your cooperation in our audit process of your facility's classification of the waste stream represented by the Texas waste code 00133082.

The TCEQ has completed its audit and finds no reason to request additional information at this time. If you have any questions regarding this review, please do not hesitate to contact me at (512) 239-6412.

Sincerely,

M. Scott Green

Scott Green, Chemist
I&HW Permits Section, MC-130
Waste Permits Division

cc: TCEQ Region 07 Office, Odessa, Texas

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MAR 14 2006
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INDUSTRIAL WASTE CLASSIFICATION CHECK-SHEET

TNRCC Solid Waste Registration Number:

Texas Waste Code:

Waste Description: empty 5 gallon containers

Description of Process which Generates the Waste: emptying & crushing 5 gallon containers that previously held an epoxy pipe coating

Part A. HAZARDOUS WASTE DETERMINATION *to be performed by all generators of waste (taken from 40 Code of Federal Regulations (CFR) Part 261)*

If the answer to any of the following questions in this Part is "yes", then the waste is hazardous. If the waste is hazardous it can not be classified as a non-hazardous waste. **IF IT IS A HAZARDOUS WASTE, YOU NEED NOT PROCEED TO PART B.**

DETERMINATION	Status	Method Used
Is the waste a listed hazardous waste (F,K,P,U listed), mixed with listed hazardous waste, or derived from a listed hazardous waste per 40 CFR §261.31, §261.32, and §261.33?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste ignitable per 40 CFR §261.21?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste corrosive per 40 CFR §261.22?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste reactive per 40 CFR §261.23?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste toxic per 40 CFR §261.24?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others

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If the answers are "NO" to all of the preceding questions and the waste is an industrial waste, proceed to the nonhazardous determination. If the waste is non-industrial, Stop here.

Part B CLASS 1 & Class 2 WASTE DETERMINATION *applicable to nonhazardous industrial waste only (taken from 30 Texas Administrative Code (TAC) Section (8) 335.505 and §335.508)*

If the answer to any of the following non-numbered questions in this Part is "yes", then the non-hazardous waste is a Class 1 waste. If all the answers to the following non-numbered questions in this Part are "no", then the waste can be considered a Class 2 waste.

<p>Has the generator chosen to classify his non-hazardous waste as a Class 1 waste?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others</p>
<p>Are any of the answers to questions (1) or (2) below "NO"?</p> <p><i>If the waste is a container, greater than 5 gallons in holding capacity, which has held a Hazardous Substance (as defined in 40 CFR Part 302), a hazardous waste, a Class 1 waste, and/or a material which would be classified as a hazardous or Class 1 waste if disposed, answer questions (1) and (2). If not, proceed to the next non-numbered question.</i></p> <p>(1) Has the container had all its residues removed?</p> <p>(2) Has the container been rendered unusable?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others</p>
<p>Does the waste contain asbestos material identified as Regulated Asbestos Containing Material (RACM) as defined in 40 CFR Part 61?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others</p>
<p>Is the waste contaminated by a material which originally contained greater than or equal to 50 parts per million total polychlorinated biphenyls (PCBs)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others</p>
<p>Does the waste contain greater than or equal to 50 ppm PCBs?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others</p>
<p>Does the waste contain greater than 1500 ppm total petroleum hydrocarbons (TPH) by TNRCC 1005 Method?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others</p>
<p>Is the waste from the production of a "new chemical substance" (as defined by the federal Toxic Substances Control Act, 15 U.S.C.A §2602(9))?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others</p>

If the waste is a liquid, does it have a flash point of less than 65.6 degrees C (150 degrees F)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste a solid or semi-solid which, under conditions normally incident to storage, transportation, and disposal, is liable to cause fires through friction, retained heat from manufacturing or processing, or which can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste a semi-solid or solid which, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution having a pH less than or equal to 2 or greater than or equal to 12.5?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R when submitted to the Toxicity Characteristic Leaching Procedure (TCLP)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others

For a list of Class 1 toxic constituents and their regulatory limit, please see 30 Texas Administrative Code (TAC) 335, Table 1 Appendix of Subchapter R.

Part C: CLASS 3 WASTE DETERMINATION - applicable to nonhazardous industrial waste which does not meet the definition of a Class 1 waste and is not specifically identified as a Class 2 waste (taken from 30 TAC §335.507 and §335.508)

If the answer to any of the following questions is "YES", then the non-hazardous, industrial waste can not be considered a Class 3 waste.

Is the waste essentially insoluble**?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
** Please note that "if the waste is liquid, then it <u>cannot</u> be a Class 3 industrial waste."		
Is the waste an empty container?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste a medical waste regulated under the 30 TAC Chapter 330 Subchapter Y?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
When submitted to the 7-Day Distilled Water Leachate Test, does the waste leach constituents at or above the Maximum Contaminant Levels listed in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others

When submitted to the Toxicity Characteristic Leaching Procedure (TCLP), does the waste leach Class 1 toxic constituents* listed in Table 1, Appendix 1 of Subchapter R at or above their detection levels? * Excluded from this list of Class 1 toxic constituents are those constituents which are addressed in the previous question (ie. constituents identified in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Does the waste contain petroleum hydrocarbons (Method: TNRCC 1005)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Does the waste contain polychlorinated biphenyls (PCBs)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste readily decomposable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others

If all the answers to the preceding questions are "NO", proceed to the next question to continue the Class 3 evaluation.

Is the waste inert? (Inertness refers to chemical inactivity of an element, compound, or a waste.)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
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If all the answers to the questions in Part C.1. are "NO", and all the answers to the questions in Part C.2. are "YES", then the non-hazardous waste can be considered a Class 3 waste.

IF YOU USE THIS CHECK-SHEET TO SUPPORT YOUR WASTE'S CLASSIFICATION, BE SURE TO ATTACH COPIES OF ALL THE INFORMATION YOU USED IN ANSWERING THE QUESTIONS. Examples of such information might include, but is not limited to, the following: process knowledge, material safety data sheets, analytical results, an explanation of why any samples taken are representative of the waste, and "chain of custodies" for any samples taken.

Reviewed By: Scott Green	Completion Date: 8/12/05
Status: <input checked="" type="checkbox"/> OK <input type="checkbox"/> INACTIVE <input type="checkbox"/> PENDING <input type="checkbox"/> NO ACTION REQUIRED	COMMENTS: empty 5 gallon container, class 2 per 30 TAC 335.506 (2) (A) (ii)

Analytical Review Checklist

ANALYTICAL QA/QC	CHECKSHEET	Any comments
Chain of Custody complete and signed	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Date Sx taken	__/__/__	
Date Sx Extracted	__/__/__	
Date Sx Analyzed	__/__/__	Any Hold Times exceeded: Yes <input type="checkbox"/> No <input type="checkbox"/>
Sx Preserved and Containerized Properly	Yes <input type="checkbox"/> No <input type="checkbox"/>	See SW-846, Chapter 2, hold time between sampling & extraction, hold time between extraction and analytical test
Appropriate Extraction Procedure	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Appropriate Analytical Procedure	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Calibration Curve; Linear, 2nd order or 3rd Order:	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Detection Limits OK	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Interference Check sample (ICP only)	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Laboratory Control Samples	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Check Standards; Calibration still OK	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Duplicate Sx OK, if duplicates and spike are wrong, then data is invalid	Yes <input type="checkbox"/> No <input type="checkbox"/>	Check Laboratory Numbers and make sure they are at least what are set by EPA for the method type
Spike Recovery OK	Yes <input type="checkbox"/> No <input type="checkbox"/>	Check Laboratory Numbers and make sure they are at least what are set by EPA for the method type
Surrogate Recovery OK	Yes <input type="checkbox"/> No <input type="checkbox"/>	Check Laboratory Numbers and make sure they are at least what are set by EPA for the method type
Are Field Blanks Non-detect	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Are Method Blanks Non-detect	Yes <input type="checkbox"/> No <input type="checkbox"/>	

Precision: Relative Percent Difference (for Duplicates)

$$\frac{(Sx_1 - Sx_{1dup})}{(Sx_1 + Sx_{1dup})/2} \times 100$$

Accuracy: Percent recovery (Spikes)

$$\frac{\text{Spike } Sx - \text{Unspiked } Sx}{\text{Amount Spiked}} \times 100$$

AA = Atomic Absorption
ICP = Inductively coupled plasma

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 19, 2005

Raymond Marrero
Permian Enterprises
2121 W Murphy
Odessa, TX 79763

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
30664-00133082-A

Re: Permian Enterprises
Solid Waste Registration Number: 30664
Texas Waste Code: 00133082

Dear Raymond Marrero:

In order to better protect the environment of Texas, The Texas Commission on Environmental Quality (TCEQ) randomly performs audits on waste stream notifications, specifically the proper waste classification. The waste stream identified by the Texas waste code 00133082 has been chosen for such a review.

The TCEQ requests that your facility submit all information and rationale that was used in classifying this waste. This submittal must be provided to the Technical Analysis staff and to the TCEQ Region 07 Office within 10 days of your receipt of this letter. In the submittal, please reference the following number:

30664-00133082-A

For your review, we have enclosed a handout regarding waste classification documentation.

If you have any questions regarding this letter or the review process, please contact a member of the Technical Analysis staff at (512) 239-6412.

Sincerely,

M. Scott Green

Scott Green
I&HW Permits Section, MC-130
Waste Permits Division

Enclosure

cc: TCEQ Region 07 Office, Odessa, Texas



August 2, 2005

Certified Mail
Return Receipt Requested
7003 1680 0006 6222 1303

AMARILLO, TX

921 North Bivins
Amarillo, TX 79107
806-467-0607
FAX: 806-467-0622

AUSTIN, TX

13009 Dessau Road
Suite A
Austin, TX 78754
512-989-3428
FAX: 512-989-3487

MIDLAND, TX

#9 East Industrial Loop
Midland, TX 79701
432-522-2133
FAX: 432-522-2180

NEW BRAUNFELS, TX

707 N. Walnut Ave., Suite 208
New Braunfels, TX 78130
210-579-0235
FAX: 210-568-2191

TULSA, OK

1439 East 41st Street
Tulsa, OK 74105
918-742-0871
FAX: 918-742-0876

HOBBS, N.M.

318 East Taylor
Hobbs, N.M. 88241
505-393-4261
FAX: 505-393-4658

Environmental:

Biologists

Chemists

Corrective Action
Project Managers

Engineers

Geologists

Scientists

Toll Free: 866-742-0742
www.llano-permian.com

Texas Commission on Environmental Quality (TCEQ)
I&HW Permits Section (MC-130)
Waste Permits Division
P.O. Box 13087
Austin, Texas 78711-3087

Attn: Scott Green

Re: 30664-00133082-A
Permian Enterprises, LTD.
Solid Waste Registration Number: 30664
Texas Waste Code: 00133082

Dear Mr. Green:

The following information is being provided to address the request for information in your July 19, 2005 letter (30664-00133082-A) on behalf of Permian Enterprises, LTD. in Odessa, Ector County, Texas. Your letter requests submittal of all information and rationale that was used in classifying Texas Waste Code 00133082.

Waste stream 00133082 is described as: RCRA empty crushed 5-gal. containers on the TCEQ Notice of Registration (NOR) for this facility.

In accordance with 30 TAC §335.508(2)(A)(ii) (referenced below), Permian Enterprises generates empty 5-gal. metal containers that previously held an epoxy pipe coating material. The containers are turned upside down over a screen and waste container to drain any liquid remaining in the containers that will flow. The 5-gal. containers are then crushed and rendered unusable and are stored in a roll-off box. The containers from the roll-off box are then sent for disposal.

Attached to this letter is a recent Manifest, #3651837, for transport/disposal at the Republic CSC landfill, State Facility ID: H1209, in Avalon, Texas.

A copy of this letter has been sent via certified mail to the TCEQ Region 07, Midland Office.

RECEIVED

AUG 08 2005

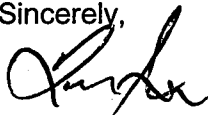
WASTE PERMITS DIVISION
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY
LLH

DOC # 5366

UIC Scott Green

If you have any questions or need additional information, please contact me or Raymond Marrero, Permian Enterprises LTD.-Director of Operations at 432-332-0903.

Sincerely,



Terry Jordan
Sr. Project Manager
Llano-Permian Environmental
P 432-522-2133
F 432-522-2180
E [REDACTED]



Raymond Marrero
Director of Operations
Permian Enterprises, LTD.
2121 W. Murphy St.
Odessa, Texas 79763
P 432-332-0903
F 432-332-3053
E [REDACTED]

Attachment:

Copy of Manifest #3651837
06/13/05

Cc:

TCEQ Region 7 (Midland) Office
3300 North A St., Bldg. 4-107
Midland, TX 79705-5451

Certified Mail
Return Receipt Requested
7003 1680 0006 6222 1310

Regulatory Reference:

30 TAC §335.508. Classification of Specific Industrial Solid Wastes.

The following nonhazardous industrial solid wastes shall be classified no less stringently than according to the provisions of this section.

(2) Empty containers that are a solid waste as defined in §335.1 (relating to Definitions) shall be subject to the following criteria:

(A) A container which has held a Hazardous Substance as defined in 40 CFR Part 302, a Hazardous waste, a Class 1 waste, or a material which would be classified as a Hazardous or Class 1 waste if disposed of, and is empty per §335.41(f)(2) of this title (relating to Purpose, Scope and Applicability concerning empty containers):

(ii) may be classified as a Class 2 waste if the container has a capacity of five gallons or less;

SECTION ON
MENTAL QUALITY

Box 13087

ustin, Texas 78711-3087



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

Form approved. OMB No. 2050-0029

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. TXD0004252		Manifest Document No. 54025		2. Page 1 of 1		Information in the shaded areas is not required by EPA.	
3. Generator's Name and Mailing Address ICO Perlan Enterprizes, LTD Contact: Raymond Marrero 316 S. Williams Odessa, TX 79753				6. US EPA ID Number TXR000042697		A. State Manifest Document No. 3651837		B. State Generator's ID 88 6566 3066	
Generator's Phone (432) 332-0903				7. Transporter 1 Company Name SET Environmental		C. State Transporter's ID 26776		D. Transporter's Phone 800/544-1313	
7. Transporter 2 Company Name				8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Republic CSC 101 Republic Way Avalon, TX 76623				10. US EPA ID Number TXD000836585		G. State Facility's ID H1206		H. Facility's Phone 800/256-9278	
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.			
	a. DOT Non-Regulated, EPA Non-Hazardous RCRA Empty Crushed Pails & Buckets	00	CM	00025	Y	6566007 09063082 00133082 R99 08/02/05			
	b.								
	c.								
	d.								
J. Additional Descriptions for Materials Listed Above 11A) 0405 04 0117						K. Handling Codes for Wastes Listed			
15. Special Handling Instructions and Additional Information Emergency Contact: @ SET Environmental Services 800/544-1313 or Generator @ (432) 332-0903									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimize present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name RYNALDO GARZA JR.				Signature <i>Rynaldo Garza Jr.</i>		Month Day Year 6 13 05			
Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name BOBBY BOWEN				Signature <i>Bobby Bowen</i>		Month Day Year 06 13 05			
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name				Signature CSC Disposal, Inc.		Month Day Year			
19. Discrepancy Indication Space PO Box 236 Avalon, TX 76623 (972) 813-413 FF83									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name PATSY MCGRAW				Signature <i>Patsy McGraw</i>		Month Day Year 6 13 05			

REPUBLIC /
CSC DISPOSAL & LANDFILL, INC.

FACSIMILE TRANSMITTAL SHEET

From

TO: *Jerry Jordan*
COMPANY:

FROM: *Jeri Miller*
DATE:

FAX NUMBER:
432-522-2180
PHONE NUMBER

TOTAL NO. OF PAGES INCLUDING COVER:
2
SENDER'S PHONE NUMBER:
800/256-9278 or 972/627-3413

RE:
SENDER'S FAX NUMBER:
972/627-3461

- URGENT
- FOR REVIEW
- PLEASE COMMENT
- PLEASE REPLY

NOTES/COMMENTS

Copy of manifest

Ms. Miller,

Would you please correct your copy of the manifest for
the following Waste No. 00133082

SENDING REPORT

Aug. 02 2005 11:59AM

YOUR LOGO :LLAND PERMIAN ENVIRONMENT
YOUR FAX NO. :432522180

NO.	OTHER FACSIMILE	START TIME	USAGE TIME	MODE	PAGES	RESULT
01	19726273461	Aug. 02 11:58AM	01'14	SND	02	OK

TO TURN OFF REPORT, PRESS 'MENU' #04 SET.
THEN SELECT OFF BY USING 'JOG-DIAL'.

FOR FAX ADVANTAGE ASSISTANCE, PLEASE CALL 1-800-HELP-FAX (435-7329).

ihw/30664/100

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

JHW/WAT 30664-00133082-A
Permian Enterprises Ltd
Attn: Raymond Marrero
2121 W Murphy
Odessa, TX 79763

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
X-Melinda Ryan Addressee

B. Received by (Printed Name) C. Date of Delivery
 7-25-05

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

E. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number 7004 1160 0002 0737 1678
(Transfer from service label)

AM 6-7-05 TB

IHW 30664 CO



INDUSTRIAL and HAZARDOUS WASTE CHANGE FORM

This form is to be used by a Facility Representative and/or a TNRCC Investigator to request a change be made in the information in the TNRCC and EPA databases (TRACS and RCRIS).

Current Site Information - SECTION I must be complete for this form to be valid. Please write "N/A" in boxes that do not apply in Section I.

SECTION I:

TNRCC Registration Number:	F Number: 30664	EPA I.D. Number: TXD041404252
Current Company Name: Permian Enterprises, LTD	Current Facility Name: Permian Enterprises, Ltd.	
TNRCC Region #:	County: Ector	
Complete Site Address: 316 S. Williams Odessa, TX 79763		
Contact Person: Raymond Maverera Telephone Number (include area code): (432) 332-0903		
Facility Type (circle all that apply): <input checked="" type="checkbox"/> Generator Transporter for Hire/Self (Circle) (TRP) Receiver: <input type="checkbox"/> Treatability Study (Hazardous waste only) <input type="checkbox"/> Landfill <input type="checkbox"/> Class 1 <input type="checkbox"/> Class 2 <input type="checkbox"/> Class 3 <input type="checkbox"/> Hazardous <input type="checkbox"/> Municipal/Nonindustrial <input type="checkbox"/> Recycler <input type="checkbox"/> Hazardous <input type="checkbox"/> Class 1 <input type="checkbox"/> Other <input type="checkbox"/> Treatment <input type="checkbox"/> Storage <input type="checkbox"/> Injection Well <input type="checkbox"/> Incineration <input type="checkbox"/> Recovery <input type="checkbox"/> Energy <input type="checkbox"/> Metals <input type="checkbox"/> Solvents <input type="checkbox"/> Other <input type="checkbox"/> Other disposal Transfer Facility	Generator Type (circle all that apply): <input checked="" type="checkbox"/> Industrial <input type="checkbox"/> Nonindustrial <input type="checkbox"/> Municipal <input type="checkbox"/> Railroad Commission Jurisdiction	
Facility is currently registered as (circle all that apply): <input type="checkbox"/> Large Quantity Generator (LQG) <input checked="" type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) <input type="checkbox"/> No Hazardous Waste (NHW) - Generates more than 100kg/220 lbs monthly <input type="checkbox"/> Class 1 industrial waste but no hazardous waste		

3881 TB

UH 5-4-05

MAY 04 2005

Requested Changes - SECTION II - VII: It is only necessary to fill out the section(s) for which you are requesting changes.

SECTION II: Registration Number Needed: (complete if applicable)

Facility is required by rule to register with (Circle all that apply): TNRCC EPA
Facility is not required by rule to register but needs a Field Operations Identification Number (Circle below): F Number needed

SECTION III: Company Name Change: (complete if applicable)

Name is being changed to:
Reason for name change:

SECTION IV: Site Name Change: (complete if applicable)

Name is being changed to:
Reason for name change:

SECTION V: Mailing Address Change: (complete if applicable)

New and complete mailing address: 2121 W. Murphy Odessa, TX 79763

SECTION VI: Contact Person and/or Telephone Number Change: (complete if applicable)

New contact person:
Title:
Telephone number (include area code) of new contact person:

SECTION VII: Generator Status/Facility Type Change (complete if applicable)

<p>Facility Type (circle all that apply):</p> <p>Generator</p> <p>Transporter for Hire/Self (Circle) (TRP)</p> <p>Receiver:</p> <p><input type="checkbox"/> Treatability Study (Hazardous waste only)</p> <p><input type="checkbox"/> Landfill</p> <p style="margin-left: 20px;"><input type="checkbox"/> Class 1 <input type="checkbox"/> Class 2 <input type="checkbox"/> Class 3</p> <p style="margin-left: 20px;"><input type="checkbox"/> Hazardous <input type="checkbox"/> Municipal/Nonindustrial</p> <p><input type="checkbox"/> Recycler</p> <p style="margin-left: 20px;"><input type="checkbox"/> Hazardous <input type="checkbox"/> Class 1 <input type="checkbox"/> Other</p> <p><input type="checkbox"/> Treatment</p> <p><input type="checkbox"/> Storage</p> <p><input type="checkbox"/> Injection Well</p> <p><input type="checkbox"/> Incineration</p> <p><input type="checkbox"/> Recovery</p> <p style="margin-left: 20px;"><input type="checkbox"/> Energy <input type="checkbox"/> Metals</p> <p style="margin-left: 20px;"><input type="checkbox"/> Solvents <input type="checkbox"/> Other</p> <p><input type="checkbox"/> Other disposal</p> <p>Transfer Facility</p>	<p>Generator Type (circle all that apply):</p> <p>Industrial</p> <p>Nonindustrial</p> <p>Municipal</p> <p>Railroad Commission Jurisdiction</p>
---	---

Generator/Facility Status (circle all that apply):

Large Quantity Generator (LQG)

Small Quantity Generator (SQG)

Conditionally Exempt Small Quantity Generator (CESQG)

No Hazardous Waste Generator (NHW) (Generates more than 100kg/220 lbs monthly of Class 1 industrial waste but no hazardous waste)

Inactive (no waste of any kind is being generated but may have hazardous or non-hazardous waste left on-site)

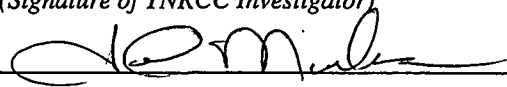
Non-Handler (an active site that does not generate hazardous waste and does not generate more than 100kg/220 lbs monthly of Class 1 Industrial waste)

Abandoned (no identifiable responsible party for the site)

Closed RCRA Unit(s) [RCRA Permit Number(s) _____]

SECTION VIII: Additional Comments: (Optional):

SECTION IX: Signature Block: (must be signed by TNRCC Investigator and/or Facility Representative for this form to be considered valid):

<p>(Signature of TNRCC Investigator)</p> 	<p>(Date)</p> <p>4/22/05</p>
<p>(Signature of Facility Representative)</p>	<p>(Date)</p>

Facility Representatives should send this form to:
Industrial and Hazardous Division/Waste Evaluation Section, MC-129
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, Texas 78753

RECEIVED
JUN 3 2005
ICEA - CENTRAL FILE ROOM

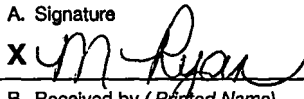
D

JUL 30664/CO

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE Mr. Raymond Marrero	
Postage	\$ 6.00
Certified Fee	0.10
Return Receipt Fee (Endorsement Required)	1.95
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 8.05
NOV for CEI Permian Enterprises Ltd 316 S Williams Ector County #30664 TXD041404252 WME/clh 4/29/05	
Sent To Permian Enterprises Ltd Street, Apt. No., or PO Box No. 2121 W Murphy City, State, ZIP+4 Odessa, TX 79763	
PS Form 3800, June 2002 See Reverse for Instructions	

5967 9E65 7000 0T40 2002

RECEIVED
 JUL 05 2005
 TCEQ
 CENTRAL FILE ROOM

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Mr. Raymond Marrero Permian Enterprises Ltd 2121 W Murphy Odessa, Tx 79763		B. Received by (Printed Name) <i>M Ryan</i> Date of Delivery <i>JUL 05 2005</i>	
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number 7002 2410 0001 5936 1995 (Transfer from service label)			
PS Form 3811, February 2004 Domestic Return Receipt		102595-02-M-1540	

subsequently undergone SK Engineering's standard decontamination procedures. The sample is then handled in accordance with SK Engineering's standard sample handling procedures. The results of a sample collected in this manner should provide the TNRCC with evidence of whether decontamination and sample collection and handling procedures are effective.

QA/QC rinsate blanks and duplicate samples are utilized to check the reliability and accuracy of laboratory results. Approximately one duplicate per 10 samples and one rinsate blank per 10 samples are shipped to the lab for analysis. If only a small number of samples are collected at a site, a single duplicate sample and or rinsate blank may be used for QA/QC at more than one site. Chain of custody sample identification on duplicates and rinsate blanks is assigned and recorded such that the lab cannot discern them from actual samples.