This letter is your notice that the Texas Commission on Environmental Quality (TCEQ) executive director (ED) has issued final approval of the above-named application. According to 30 Texas Administrative Code (TAC) Section 50.135 the approval became effective on March 31, 2014, the date the ED signed the permit or other approval unless otherwise specified in the permit or other approval.

You may file a motion to overturn with the chief clerk. A motion to overturn is a request for the commission to review the TCEQ ED's approval of the application. Any motion must explain why the commission should review the TCEQ executive director's action. According to 30 TAC Section 50.139 an action by the ED is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the chief clerk within 23 days after the date of this letter. An original and 7 copies of a motion must be filed with the chief clerk in person, or by mail to the chief clerk's address on the attached mailing list. On the same day the motion is transmitted to the chief clerk, please provide copies to the applicant, the ED's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request judicial review of the ED's approval. According to Texas Water Code Section 5.351 a person affected by the ED's approval must file a petition appealing the ED's approval in Travis County district court within 30 days after the effective date of the approval. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.
Individual members of the public may seek further information by calling the Public Education Program, toll free, at 1-800-687-4040.

Sincerely,

Bridget C. Bohac
Chief Clerk
BCB/lg
Enclosure
MAILING LIST
for
US Ecology Texas, Incorporated
Permit Nos. 278, 279

FOR THE APPLICANT:
Mark John, General Manager
US Ecology Texas, Incorporated
P.O. Box 307
Robstown, Texas 78380

PROTESTANTS/INTERESTED PERSONS:
Derek McDonald
Baker Botts, LLP
98 San Jacinto Boulevard, Suite 1500
Austin, Texas 78701

FOR THE EXECUTIVE DIRECTOR
via electronic mail:
Brian Christian, Director
Texas Commission on Environmental Quality
Small Business and Environmental Assistance
Public Education Program MC-108
P.O. Box 13087
Austin, Texas 78711-3087

Guy Henry, Senior Staff Attorney
Texas Commission on Environmental Quality
Environmental Law Division MC 173
P.O. Box 13087
Austin, Texas 78711-3087

Jan Bates, Technical Staff
Texas Commission on Environmental Quality
Underground Injection Control Permits Division MC 233
P.O. Box 13087
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL
via electronic mail:
Blas J. Coy, Jr., Attorney
Texas Commission on Environmental Quality
Public Interest Counsel MC 103
P.O. Box 13087
Austin, Texas 78711-3087

FOR THE CHIEF CLERK
via electronic mail:
Bridget C. Bohac, Chief Clerk
Texas Commission on Environmental Quality
Office of Chief Clerk MC 105
P.O. Box 13087
Austin, Texas 78711-3087
April 2, 2014

Mr. Mark John
General Manager
US Ecology Texas, Inc.
P.O. Box 307
Robstown, Texas 78380

Re: Transmittal of Underground Injection Control Renewal Permits
WDW278 and WDW279
SWR No. 50052
RN101445666/CN603247974

Dear Mr. John:

Enclosed are copies of the above-referenced underground injection control renewal permits issued pursuant to the Texas Water Code, Chapter 27 and the Texas Health and Safety Code, Chapter 361. This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Questions should be directed to Jan Bates, Underground Injection Control Permits Section, at jan.bates@tceq.texas.gov or (512) 239-6627. If you will be responding by letter, please include mail code MC 233 in the mailing address.

Sincerely,

Charles W. Maguire, Director
Radioactive Materials Division
Office of Waste

CWM/JJB

Enclosures

cc: Mr. Jose Torres, EPA Region 6, 6WQ-S
Texas Commission on Environmental Quality
Austin, Texas

Permit to Conduct
Class I Underground Injection
Under Provisions of Texas Water Code
Chapter 27 and Texas Health and Safety Code Chapter 361

I. Permittee

US Ecology Texas, Incorporated
P.O. Box 307
Robstown, Texas 78380

II. Type of Permit

Initial __ Renewal __ X Amended ___
Commercial __ Noncommercial X
Hazardous X Nonhazardous X
Onsite X Offsite ___

Authorizing Disposal of Waste from Captured Facility ___
Authorizing Disposal of Waste from Off-site Facilities Owned by Owner/Operator __

III. Nature of Business

The permittee operates a commercial storage, processing and disposal facility that manages industrial hazardous, nonhazardous and municipal solid wastes via landfilling.

CONTINUED on Pages 2 through 6

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

DATE ISSUED: March 31, 2014

For The Commission
IV. General Description and Location of Injection Activity

The disposal well is used to dispose of hazardous and nonhazardous wastes generated on-site by the permittee's facility from the operation of the storage, processing and disposal units. The well is located 13,700 feet from the south line and 1,050 feet from the east line of Mariano Lopez de Herrera Survey, A-606, Latitude 27°43'49" North, Longitude 97°39'28" West, Nueces County, Texas. The injection zone is within the Frio Formation at the depths of 4130 to 5180 feet below ground level. The authorized injection interval is within the Frio Formation at the depths of 4720 to 5110 feet below ground level.

V. Character of the Waste Streams

A. Industrial hazardous and nonhazardous waste authorized to be injected by this permit shall consist solely of the following waste streams:

1. Wastes generated on-site which include:
   a. Contaminated groundwater recovered as part of the facility's groundwater restoration program;
   b. Laboratory wastes;
   c. Wash waters from the truck garage, decontamination pad, stabilization building #2, and stabilization building #3;
   d. Ponded rainwater and leachate recovered from active and closed land disposal cells;
   e. Wastewater generated by permitted waste management units and/or activities;
   f. Wastewater from the oil reclamation facility which includes process water from oil water separators, wash water, filtered water from mechanical dewatering devices, cooling tower blowdown and stormwater collected on the processing pad; and
   g. Discharge water from washing of employee uniforms.

2. Other associated wastes such as groundwater and rainfall contaminated by the above authorized wastes, spills of the above authorized wastes, and wash waters and solutions used in cleaning and servicing the waste disposal well system equipment which are compatible with the permitted waste streams, injection zone and well materials.

3. Wastes generated during well construction or closure of the well and associated facilities that are compatible with permitted wastes, injection zone and the well.

B. The injection of wastes is limited to those wastes authorized in Provision V.A. above, into the Frio Formation within the injection zone between the depths of 4130 to 5180 feet below ground level.
C. The pH of injected waste streams shall be greater than 5.0.

D. Except when authorized by the Executive Director, the specific gravity of injected fluids shall not be greater than 1.046 or less than 0.998 as measured at 68° F.

VI. Waste Streams Prohibited From Injection

Unless authorized by Provision V.A., the following waste streams are prohibited:

A. Wastes prohibited from injection in 40 CFR Part 148, Subpart B, are specifically prohibited from injection by this permit, unless an exemption from prohibition has been granted pursuant to 40 CFR Part 148, Subpart C, or the wastes meet or exceed the applicable treatment standards in 40 CFR Part 268, Subpart D;

B. Any by-product material as defined by Texas Health & Safety Code §401.003(3);

C. Any low-level radioactive waste as defined by Texas Health & Safety Code §401.004;

D. Any naturally occurring radioactive material (NORM) waste as defined by Texas Health & Safety Code §401.003(26); and

E. Any oil and gas NORM waste as defined by Texas Health & Safety Code §401.003(27).

VII. Operating Parameters

The well shall be operated in compliance with the requirements of 30 TAC Chapters 305, 331, and 335; the plans and specifications of the permit application; and the following conditions:

A. Surface injection pressure shall not cause pressure in the injection zone to:
   1. initiate any new fractures or propagate existing fractures in the injection zone;
   2. initiate new fractures or propagate existing fractures in the confining zone; or
   3. cause movement of fluid out of the injection zone that may contaminate underground sources of drinking water (USDWs), and fresh water.

B. The operating surface injection pressure shall not exceed 900 psig.

C. The maximum injection rate shall not exceed 100 gallons per minute. The average injection rate, as calculated on a monthly basis, shall not exceed 55 gallons per minute. For WDW278 and WDW279 the cumulative maximum injection rate shall not exceed 100 gallons per minute and the average cumulative injection rate, as calculated on a monthly basis, shall not exceed 55 gallons per minute.

D. The volume of wastewater injected into WDW278 shall not exceed 2,455,200 gallons per month, or 28,908,000 gallons per year, based on 55 gallons per minute. The cumulative volume of wastewater injected into WDW278 and WDW279 shall not
exceed 2,455,200 gallons per month, or 28,908,000 gallons per year, based on the cumulative injection rate of 55 gallons per minute.

E. A positive pressure of at least 100 psig over tubing injection pressures shall be maintained in the tubing-casing annulus for the purpose of leak detection. Temporary deviations from this requirement which are a part of normal well operations are authorized but may not exceed 15 minutes in duration. For 15 minutes after the pressure differential drops below 100 psig, the permittee shall conduct troubleshooting and proceed to restore a minimum 100 psig pressure differential. If a minimum 100 psig pressure differential cannot be achieved within 15 minutes, the permittee shall notify the Texas Commission on Environmental Quality (TCEQ) and commence shut-in procedures on the well. The permittee may continue to operate the well under flow conditions that maintain a minimum 100 psig pressure differential.

F. The permittee shall notify the Executive Director at least 24 hours prior to commencing any workover which involves taking the injection well out of service. Approval by the Executive Director shall be obtained before the permittee may begin work. Notification shall be in writing and shall include plans for the proposed work. The Executive Director may grant an exception to the prior written notification and approval when immediate action is required to prevent pollution according to 30 TAC §331.5. Completion of the well outside the approved injection interval, by perforation of casing, setting of screen, or establishment of open hole section, requires that the permitted injection interval be changed according to 30 TAC §331.62(a)(3)(C) to include the depths of all well completion. Pressure control equipment shall be installed and maintained during workovers which involve the removal of tubing.

VIII. Monitoring and Testing Requirements

A. Monitoring and testing shall be in compliance with the requirements of 30 TAC §305.125, §331.64, the plans and specifications of the permit application, and the following conditions.

B. The integrity of the long string casing, injection tubing, and annular seal shall be tested by means of an approved pressure test with a liquid or gas annually and whenever there has been a well workover. The integrity of the cement within the injection zone shall be tested by means of an approved radioactive tracer survey annually. A radioactive tracer survey may be required after workovers that have the potential to damage the cement within the injection zone.

C. The pressure buildup in the injection zone shall be monitored annually, including at a minimum, a shutdown of the well for a sufficient time to conduct a valid observation of the pressure fall-off curve.

D. A temperature log, noise log, oxygen activation log or other approved log is required at least once every five years to test for fluid movement along the entire borehole.

E. A casing inspection, casing evaluation, or other approved log shall be run whenever the owner or operator conducts a workover in which the injection string is pulled, unless the Executive Director waives this requirement due to well construction or
other factors which limit the test’s reliability, or based upon the satisfactory results of a casing inspection log run within the previous five years. The Executive Director may require that a casing inspection log be run every five years if there is sufficient reason to believe the integrity of the long string casing of the well may be adversely affected by naturally occurring or man-made events.

F. Injection fluids shall be tested in accordance with 30 TAC §331.64(b) and the approved waste analysis plan.

G. The pH and specific gravity of the injected waste shall be monitored continuously at a minimum frequency of at least once every 24 hours and whenever the waste stream changes.

H. Corrosion monitoring of well materials shall be conducted quarterly and in accordance with 30 TAC §331.64(g). Test materials shall be the same as those used in the wellhead, injection tubing, packer, and long string casing, and shall be continuously exposed to the waste fluids except when the well is taken out of service.

I. The permittee shall ensure that all waste analyses used for waste identification or verification and other analyses for environmental monitoring have been performed in accordance with methods specified in the current editions of EPA SW-846, ASTM or other methods accepted by the TCEQ. The permittee shall have a Quality Assurance/Quality Control program that is consistent with EPA SW-846 and the TCEQ Quality Assurance Project Plan.

IX. Record Keeping Requirements

The permittee shall keep complete and accurate records as required by 30 TAC Chapters 305, 331, and 335.

X. Financial Assurance for Well Closure

In accordance with 30 TAC Chapter 37, §§305.154(a)(9), and §§331.142-144, the permittee shall secure and maintain financial assurance, in a form approved by the Executive Director, in the amount of $263,200 (cost estimate prepared June 2013 in current dollars). Adjustments to the cost estimates for plugging and abandonment in current dollars, and to financial assurance based thereon, shall be made in accordance with 30 TAC §331.143(d) and Chapter 37.

XI. Additional Requirements

A. Acceptance of this permit by the permittee constitutes an acknowledgment and agreement that the permittee will comply with all the terms and conditions embodied in the permit, and the rules and other orders of the Commission.

B. This permit is subject to further orders and rules of the Commission. In accordance with the procedures for amendments and orders, the Commission may incorporate into permits already granted, any condition, restriction, limitation, or provision reasonably necessary for the administration and enforcement of Texas Water Code, Chapter 27 and Texas Health and Safety Code, Chapter 361.
C. This permit does not convey any property rights of any sort, nor any exclusive privilege, and does not become a vested right in the permittee.

D. The issuance of this permit does not authorize any injury to persons or property or an invasion of other property rights, or any infringement of state or local law or regulations.

E. The following rules are incorporated as terms and conditions of this permit by reference:

1. 30 TAC Chapter 305, Consolidated Permits;

2. 30 TAC Chapter 331, Underground Injection Control; and

3. 30 TAC Chapter 335, Industrial Solid Waste and Municipal Hazardous Waste.

F. The express incorporation of the above rules as terms and conditions of this permit does not relieve the permittee of an obligation to comply with all other laws or regulations which are applicable to the activities authorized by this permit.

G. Incorporated Application Materials. This permit is based on, and the permittee shall follow, the plans and specifications contained in the Class I Underground Injection Control Application dated March 16, 2012, as revised on April 19, 2012, December 12, 2012, March 8, 2013, June 27, 2013 and October 11, 2013, which are hereby approved subject to the terms of this permit and any other orders of the TCEQ.

These materials are incorporated into this permit by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this permit upon the date of approval by the Commission.

H. All pre-injection units servicing this well are authorized under Resource Conservation and Recovery Act (RCRA) permit HW50052 under 30 TAC Chapter 335 or are exempt from the requirement for a permit under 30 TAC §335.69.

I. The Texas solid waste registration (SWR) number for this site is 50052.
Texas Commission on Environmental Quality

Protecting Texas by Reducing and Preventing Pollution

May 3, 2017

9489 0090 0027 6009 3379 14
CERTIFIED MAIL

Mr. Andrew McDaniel
General Manager
US Ecology Texas, Inc.
P.O. Box 307
Robstown, Texas 78380

Re: Transmittal of Underground Injection Control Minor Modification
   Permit No. WDW278
   SWR No. 50052
   RN101445666/CN603247974

Dear Mr. McDaniel:

In response to your minor modification application dated February 28, 2017, enclosed is the
minor modification to the above-referenced permit issued under the authority of 30 TAC
§305.72(b)(5). This action is taken under authority delegated by the Executive Director of the
Texas Commission on Environmental Quality. Your minor modification application requests
installation of a 5-1/2” casing liner, 2-7/8” injection tubing and packer, and additional
perforations. This permit modification should be attached to the subject permit.

If you have any questions or comments regarding this matter please contact Jan Bates,
Underground Injection Control Permits Section, at jan.bates@tceq.texas.gov or (512) 239-6627.
If you will be responding by letter, please include mail code MC 233 in the mailing address.

Sincerely,

Charles W. Maguire, Director
Radioactive Materials Division
Office of Waste

CWM/JB/krh-d

Enclosure

cc: Mike Johnson, Strata Technologies, LLC
    Mr. Jose Torres, EPA Region 6, 6WQ-S
MINOR MODIFICATION TO
CLASS I UNDERGROUND INJECTION CONTROL PERMIT NO. WDW278

ISSUED ON MARCH 31, 2014

TO US ECOLOGY TEXAS, INCORPORATED

AND

MODIFIED ON JUNE 24, 2015

Class I UIC Permit No. WDW278 is hereby modified as follows:

Page 6 of 6

Provision XI.G.

Incorporated Application Materials. This permit is based on, and the permittee shall follow, the plans and specifications contained in the Class I Underground Injection Control Application dated March 16, 2012, as revised on April 19, 2012, December 12, 2012, March 8, 2013, June 27, 2013 and October 11, 2013, and the following amendments and modifications to the permit, which are hereby approved subject to the terms of this permit and any other orders of the TCEQ:

CONTINUED on Page 2

This Minor Modification is part of Permit No. WDW278 and should be attached thereto.

APPROVED, ISSUED AND EFFECTIVE in accordance with 30 Texas Administrative Code §305.72(b)(5).

ISSUED DATE: May 3, 2017

[Signature]

For The Commission
<table>
<thead>
<tr>
<th>Permit Action</th>
<th>Application Date</th>
<th>Description of Change</th>
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<tbody>
<tr>
<td>Minor modification</td>
<td>Application dated</td>
<td>Revise well schematic to include casing</td>
</tr>
<tr>
<td></td>
<td>April 17, 2015</td>
<td>hole within injection interval</td>
</tr>
</tbody>
</table>

These materials are incorporated into this permit by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this permit upon the date of approval by the Commission.

is replaced with

Incorporated Application Materials. This permit is based on, and the permittee shall follow, the plans and specifications contained in the Class I Underground Injection Control Application dated March 16, 2012, as revised on April 19, 2012, December 12, 2012, March 8, 2013, June 27, 2013, and October 11, 2013, and the following amendments and modifications to the permit, which are hereby approved subject to the terms of this permit and any other orders of the TCEQ:

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</tr>
<tr>
<td></td>
<td>February 28, 2017 and</td>
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</tr>
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<td></td>
<td>revised</td>
<td>additional perforations</td>
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<td>March 29, 2017 and</td>
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<td></td>
<td>April 10, 2017</td>
<td></td>
</tr>
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These materials are incorporated into this permit by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this permit upon the date of approval by the Commission.
I. Permittee

US Ecology Texas, Incorporated
P.O. Box 307
Robstown, Texas 78380

II. Type of Permit

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

III. Nature of Business

The permittee operates a commercial storage, processing and disposal facility that manages industrial hazardous, nonhazardous and municipal solid wastes via landfilling.

CONTINUED on Pages 2 through 7

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

DATE ISSUED: March 31, 2014

For The Commission
IV. General Description and Location of Injection Activity

The disposal well will be used to dispose of hazardous and nonhazardous wastes generated on-site by the permittee's facility from the operation of the storage, processing and disposal units. The well will be located approximately 13,850 feet from the south line and approximately 1,100 feet from the east line of Mariano Lopez de Herrera Survey, A-606, Latitude 27°43'51" North, Longitude 97°39'28" West, Nueces County, Texas. The injection zone is within the Frio Formation at the depths of 4130 to 5180 feet below ground level. The authorized injection interval is within the Frio Formation at the depths of 4680 to 5130 feet below ground level.

V. Drilling and Completion Requirements

A. The drilling and completion of the well shall be done in accordance with 30 TAC Section (§) 331.62, the plans and specifications of the permit application, and the following conditions.

B. The permittee shall set and cement surface casing to a minimum subsurface depth of 1550 feet below ground level and long string casing into or through the injection zone in order to properly protect each underground source of drinking water (USDW) or freshwater aquifer.

C. To protect the ground surface from spills and releases, the base of the wellhead shall be enclosed by a diked, impermeable pad or sump. Any liquid collected shall be disposed of in an appropriate manner.

D. Mechanical integrity shall be demonstrated prior to authorization by the Executive Director to conduct injection operations.

E. Any changes to the plans and specifications in the original application shall be approved in writing by the Executive Director that said changes provide protection standards equivalent to or greater than the original design criteria.

VI. Character of the Waste Streams

A. Industrial hazardous and nonhazardous waste authorized to be injected by this permit shall consist solely of the following waste streams:

1. Wastes generated on-site which include:
   a. Contaminated groundwater recovered as part of the facility's groundwater restoration program;
   b. Laboratory wastes;
   c. Wash waters from the truck garage, decontamination pad, stabilization building #2, and stabilization building #3;
   d. Ponded rainwater and leachate recovered from active and closed land disposal cells;
e. Wastewater generated by permitted waste management units and/or activities;

f. Wastewater from the oil reclamation facility which includes process water from oil water separators, wash water, filtered water from mechanical dewatering devices, cooling tower blowdown and stormwater collected on the processing pad; and

g. Discharge water from washing of employee uniforms.

2. Other associated wastes such as groundwater and rainfall contaminated by the above authorized wastes, spills of the above authorized wastes, and wash waters and solutions used in cleaning and servicing the waste disposal well system equipment which are compatible with the permitted waste streams, injection zone and well materials.

3. Wastes generated during well construction or closure of the well and associated facilities that are compatible with permitted wastes, injection zone and the well.

B. The injection of wastes is limited to those wastes authorized in Provision VI.A. above, into the Frio Formation within the injection zone between the depths of 4130 to 5180 feet below ground level.

C. The pH of injected waste streams shall be greater than 5.0.

D. Except when authorized by the Executive Director, the specific gravity of injected fluids shall not be greater than 1.046 or less than 0.998 as measured at 68° F.

VII. Waste Streams Prohibited From Injection

Unless authorized by Provision VI.A., the following waste streams are prohibited:

A. Wastes prohibited from injection in 40 CFR Part 148, Subpart B, are specifically prohibited from injection by this permit, unless an exemption from prohibition has been granted pursuant to 40 CFR Part 148, Subpart C, or the wastes meet or exceed the applicable treatment standards in 40 CFR Part 268, Subpart D;

B. Any by-product material as defined by Texas Health & Safety Code §401.003(3);

C. Any low-level radioactive waste as defined by Texas Health & Safety Code §401.004;

D. Any naturally occurring radioactive material (NORM) waste as defined by Texas Health & Safety Code §401.003(26); and

E. Any oil and gas NORM waste as defined by Texas Health & Safety Code §401.003(27).
VIII. Operating Parameters

The well shall be operated in compliance with the requirements of 30 TAC Chapters 305, 331, and 335; the plans and specifications of the permit application; and the following conditions:

A. Surface injection pressure shall not cause pressure in the injection zone to:
   1. initiate any new fractures or propagate existing fractures in the injection zone;
   2. initiate new fractures or propagate existing fractures in the confining zone; or
   3. cause movement of fluid out of the injection zone that may contaminate USDWs and fresh water.

B. The operating surface injection pressure shall not exceed 900 psig.

C. The maximum injection rate shall not exceed 100 gallons per minute. The average injection rate, as calculated on a monthly basis, shall not exceed 55 gallons per minute. For WDW278 and WDW279 the cumulative maximum injection rate shall not exceed 100 gallons per minute and the average cumulative injection rate, as calculated on a monthly basis, shall not exceed 55 gallons per minute.

D. The volume of wastewater injected into WDW279 shall not exceed 2,455,200 gallons per month, or 28,908,000 gallons per year, based on 55 gallons per minute. The cumulative volume of wastewater injected into WDW278 and WDW279 shall not exceed 2,455,200 gallons per month, or 28,908,000 gallons per year, based on the cumulative injection rate of 55 gallons per minute.

E. A positive pressure of at least 100 psig over tubing injection pressures shall be maintained in the tubing-casing annulus for the purpose of leak detection. Temporary deviations from this requirement which are a part of normal well operations are authorized but may not exceed 15 minutes in duration. For 15 minutes after the pressure differential drops below 100 psig, the permittee shall conduct troubleshooting and proceed to restore a minimum 100 psig pressure differential. If a minimum 100 psig pressure differential cannot be achieved within 15 minutes, the permittee shall notify the Texas Commission on Environmental Quality (TCEQ) and commence shut-in procedures on the well. The permittee may continue to operate the well under flow conditions that maintain a minimum 100 psig pressure differential.

F. The permittee shall notify the Executive Director at least 24 hours prior to commencing any workover which involves taking the injection well out of service. Approval by the Executive Director shall be obtained before the permittee may begin work. Notification shall be in writing and shall include plans for the proposed work. The Executive Director may grant an exception to the prior written notification and approval when immediate action is required to prevent pollution according to 30 TAC §331.5. Completion of the well outside the approved injection interval, by perforation of casing, setting of screen, or establishment of open hole section, requires that the permitted injection interval be changed according to 30 TAC §331.62(a)(3)(C) to include the depths of all well completion. Pressure control
equipment shall be installed and maintained during workovers which involve the removal of tubing.

IX. Monitoring and Testing Requirements

A. Monitoring and testing shall be in compliance with the requirements of 30 TAC §305.125, §331.64, the plans and specifications of the permit application, and the following conditions.

B. The integrity of the long string casing, injection tubing, and annular seal shall be tested by means of an approved pressure test with a liquid or gas annually and whenever there has been a well workover. The integrity of the cement within the injection zone shall be tested by means of an approved radioactive tracer survey annually. A radioactive tracer survey may be required after workovers that have the potential to damage the cement within the injection zone.

C. The pressure buildup in the injection zone shall be monitored annually, including at a minimum, a shutdown of the well for a sufficient time to conduct a valid observation of the pressure fall-off curve.

D. A temperature log, noise log, oxygen activation log or other approved log is required at least once every five years to test for fluid movement along the entire borehole.

E. A casing inspection, casing evaluation, or other approved log shall be run whenever the owner or operator conducts a workover in which the injection string is pulled, unless the Executive Director waives this requirement due to well construction or other factors which limit the test’s reliability, or based upon the satisfactory results of a casing inspection log run within the previous five years. The Executive Director may require that a casing inspection log be run every five years if there is sufficient reason to believe the integrity of the long string casing of the well may be adversely affected by naturally occurring or man-made events.

F. Injection fluids shall be tested in accordance with 30 TAC §331.64(b) and the approved waste analysis plan.

G. The pH and specific gravity of the injected waste shall be monitored continuously at a minimum frequency of at least once every 24 hours and whenever the waste stream changes.

H. Corrosion monitoring of well materials shall be conducted quarterly and in accordance with 30 TAC §331.64(g). Test materials shall be the same as those used in the wellhead, injection tubing, packer, and long string casing, and shall be continuously exposed to the waste fluids except when the well is taken out of service.

I. The permittee shall ensure that all waste analyses used for waste identification or verification and other analyses for environmental monitoring have been performed in accordance with methods specified in the current editions of EPA SW-846, ASTM or other methods accepted by the TCEQ. The permittee shall have a Quality Assurance/Quality Control program that is consistent with EPA SW-846 and the TCEQ Quality Assurance Project Plan.
X. Record Keeping Requirements

The permittee shall keep complete and accurate records as required by 30 TAC Chapters 305, 331, and 335.

XI. Financial Assurance for Well Closure

In accordance with 30 TAC Chapter 37, §305.154(a)(9), and §§331.142-144, the permittee shall secure and maintain financial assurance, in a form approved by the Executive Director, in the amount of $263,200 (cost estimate prepared June 2013 in current dollars). Adjustments to the cost estimates for plugging and abandonment in current dollars, and to financial assurance based thereon, shall be made in accordance with 30 TAC §331.143(d) and Chapter 37. Financial assurance shall be obtained at least 60 days prior to the commencement of drilling of the well.

XII. Additional Requirements

A. Acceptance of this permit by the permittee constitutes an acknowledgment and agreement that the permittee will comply with all the terms and conditions embodied in the permit, and the rules and other orders of the Commission.

B. This permit is subject to further orders and rules of the Commission. In accordance with the procedures for amendments and orders, the Commission may incorporate into permits already granted, any condition, restriction, limitation, or provision reasonably necessary for the administration and enforcement of Texas Water Code, Chapter 27 and Texas Health and Safety Code, Chapter 361.

C. This permit does not convey any property rights of any sort, nor any exclusive privilege, and does not become a vested right in the permittee.

D. The issuance of this permit does not authorize any injury to persons or property or an invasion of other property rights, or any infringement of state or local law or regulations.

E. The following rules are incorporated as terms and conditions of this permit by reference:

1. 30 TAC Chapter 305, Consolidated Permits;

2. 30 TAC Chapter 331, Underground Injection Control; and

3. 30 TAC Chapter 335, Industrial Solid Waste and Municipal Hazardous Waste.

F. The express incorporation of the above rules as terms and conditions of this permit does not relieve the permittee of an obligation to comply with all other laws or regulations which are applicable to the activities authorized by this permit.

G. Incorporated Application Materials. This permit is based on, and the permittee shall follow, the plans and specifications contained in the Class I Underground Injection Control Application dated March 16, 2012, as revised on April 19, 2012, December 12,
2012, March 8, 2013, June 27, 2013 and October 11, 2013, which are hereby approved subject to the terms of this permit and any other orders of the TCEQ.

These materials are incorporated into this permit by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this permit upon the date of approval by the Commission.

H. All pre-injection units servicing this well are authorized under Resource Conservation and Recovery Act (RCRA) permit HW50052 under 30 TAC Chapter 335 or are exempt from the requirement for a permit under 30 TAC §335.69.

I. The Texas solid waste registration (SWR) number for this site is 50052.