Part III – Site Development Plan
MSW Registration No. (To Be Issued)

Prepared For:

Terrabon, Inc.
Demonstration Facility
Bryan, TX
Brazos County

Prepared By:

RPS

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For Permitting Purposes Only

PART III - SITE DEVELOPMENT PLAN

Information contained in Part III of the application contains design information for Terrabon, Inc.'s (Terrabon's) Demonstration Facility in support of the overall objectives for protection of the environment as well as human health, welfare, and property. It should be noted that the Terrabon facility is an existing facility that was built to demonstrate conversion of biomass materials to energy products, and this plan has been prepared to describe the design of the Terrabon facility as it currently exists in its transition from using other feedstocks (e.g., crop silage, paper, etc.) to using solid waste (e.g., municipal solid waste [MSW]) as a feedstock. Information in this plan has been prepared in consideration of the following topics:

- Facility description;
- Land use/zoning;
- Materials managed;
- General design features;
- Drainage;
- Unit design;
- Other considerations; and
- Closure and financial assurance.

Terrabon believes that information presented in this Site Development Plan (per the requirements of 30 TAC 330.63) and associated attachments demonstrate safeguarding of the health, welfare, and physical property of the public and the environment. We further believe that the information included herein on site development has been prepared by giving proper consideration to geology, soil conditions, drainage, land use, zoning, adequacy of access roads and highways, and other considerations as they relate to this specific site.

It should be noted that the facility is a Type V facility and is not a municipal solid waste landfill. As such, the following requirements of 30 TAC Chapter 330 are not applicable per details reflected in the following regulatory citations:

- Geology Report – 30 TAC 330.63(e);
- Groundwater Sampling and Analysis Plan – 30 TAC 330.63(f); and
- Landfill Gas Management Plan – 30 TAC 330.63(g).

Per the general application requirements of 30 TAC 330.57(g), a title page and table of contents sealed by a professional engineer, as required by the Texas Engineering Practice Act, are provided.

1.0 Facility Description

The purpose of the Terrabon facility, which is the subject of this application, is to demonstrate on a large scale the commercial viability of receive incoming solid waste from residential, commercial, and certain industrial sources and conversion of the materials, which serve as feedstock, into energy and/or chemical products.

Attachment III-A provides a process flow diagram outlining the major steps associated with the Terrabon facility. The Terrabon facility will receive and utilize a maximum of 40 wet tons/week of MSW as feedstock. MSW may originate from multiple source areas but is primarily from household collection routes. Prior to being received at the Demonstration Facility, MSW is typically processed using a "pulping process", which applies heat and steam, and downstream screening system, which removes materials such as plastic, metal, larger objects, etc., so that it is more amenable to use directly as a feedstock by Terrabon. Load weight records for each shipment of MSW to the facility are logged by origination source (e.g., landfill name), maintained, and reported to TCEQ under 30 TAC Chapter 330, Subchapter P.

Upon entering the site, incoming MSW is typically unloaded on a designated area of the tipping building floor; however, certain materials (e.g., fluids, slurries, etc.) may be directly unloaded into the fermentation basin. MSW unloading and storage operations are primarily conducted within an enclosed building that is protected from adverse weather conditions (e.g., wind or rain) and exposure to environmental media (e.g., soil, surface water, ground water, etc.). Upon arrival, transport trucks are directed to the appropriate location after they have been checked in. Since inputs to the fermentation basin must be made at smaller loading rates and the pulping process produces larger unit quantities, storage of the incoming MSW is required. The tipping building is fully enclosed and can be provided with air conditioning, if needed, such that temperatures of 45 °F or less can be maintained. To minimize litter dispersion during unloading operations, trucks back into the loading bay(s) and unload MSW within the enclosed building.

Front end and/or tele loaders are used within the building to transport the MSW from the tipping floor area to a hydromulcher located outside the tipping building. From the hydromulcher, the MSW is pumped on an as-needed basis to the fermentation basin for subsequent use. On the

tipping floor, any materials found to not be conducive for processing will be placed in containers and subsequently removed.

Materials targeted for removal on the tipping floor area are those not conducive to processing in the fermentation basin and/or that may cause operational problems for the equipment such as large metallic objects, bulky items, and/or sizeable inert materials (e.g., concrete, electronics, etc.) that may be present. While the vast majority of these non-conducive items should be removed through the pulping/screening processes, some may still exist in the incoming MSW. Any removed (culled) materials not conducive to operations are transferred to containers (e.g., bins, rolloff boxes, etc.) for subsequent management at either a reuse/recycling facility for amenable materials (e.g., aluminum materials, ferrous metal materials, glass, electronics, etc.) or a landfill for disposal.

As a result of the fermentation and energy production process, three primary waste streams are generated from the Terrabon facility: 1) culled MSW; 2) ash/residue; and 3) remaining process waters. As mentioned earlier, culled materials will be transferred for subsequent management at either another reuse/recycling facility for amenable materials or a landfill for proper management. Waste streams generated from the Terrabon facility as well as MSW that will be accepted for management at the facility are discussed briefly below and in more detail in Part II of the application.

2.0 Solid Wastes Managed

The Terrabon facility processes solid wastes (including MSW) for use as feedstock. Additional detail regarding solid waste managed at the facility is provided in Part II of the application as well as in the Waste Acceptance Plan in the Site Operating Plan (SOP) in Part IV of this application.

3.0 General Design Features

The following section provides information regarding general design features of the Terrabon facility per the requirements of 30 TAC 330.63(b). The facility is to be registered as a Type V facility. As such, the facility is not a municipal solid waste landfill. Attachment III-B is an overall site plan for the Terrabon facility, and Attachment III-C is an operations layout drawing for the facility. General design features are also provided in Attachments III-D through III-J, which are design drawings produced for construction of the facility.

3.1 Facility Access

Access to the facility is via Mumford Road, which is accessed via Farm to Market Road 2818 (N. Harvey Mitchell Pkwy.). Mumford Road is a two-lane, asphalt public roadway with a gross vehicle limit of 58,420 pounds. Mumford Road is maintained by the City of Bryan and Brazos County. Farm to Market Road 2818 is also a two-lane, asphalt public roadway, which is maintained by the City of Bryan, Brazos County, and Texas Department of Transportation (TxDOT). Internal facility roadways used for loading/unloading are constructed of 8-inch thick flexible base compacted to 95% of standard proctor density to provide an all-weather driving surface. MSW is unloaded onto the concrete floor of the tipping building.

Access to the site is restricted to prevent entry of unauthorized persons and livestock as well as protect the public from exposure to MSW management activities and discourage uncontrolled disposal of MSW at the site. A four-foot high barbed wire fence is constructed along all four boundaries of the facility to restrict access.

3.2 MSW Movement

This section provides a general process design and working plan for the facility as well as generalized construction details for key facility components. Attachment III-A contains a flow diagram showing a schematic view of the facility and the flow of incoming MSW through the facility during the various stages of conversion to energy products at the Terrabon facility.

3.3 Potable Water, Building Drainage, Ventilation, Sanitation, and Noise Abatement

Primary components of the Terrabon energy production process include the tipping building, fermentation basin, and liquid storage/recirculation tanks. Attachment III-B is an overall site plan for the facility, and Attachment III-C is an Operations Layout Drawing. These two drawings provide a summary of water, drainage, ventilation, sanitation, and noise abatement features of the facility. Incoming MSW is typically already processed and the tipping building and fermentation basin are enclosed. As such, MSW management activities are conducted indoors and potential wind-blown materials (e.g., plastic bags, paper, etc.) have been processed/removed via the prior pulping/screening, screening is not provided for the fence surrounding the facility.

Most MSW received at the facility will have been processed into a “pulped” consistency to facilitate fermentation and materials not conducive for energy production (e.g., metal, plastic, etc.) will have been removed. If the incoming materials are going to be stored for more than 72

hours and have not been previously processed (e.g., sterilized via pulping), the tipping building can be equipped, if needed, with air conditioning to facilitate storage in refrigerated conditions at 45 °F or lower. The maximum time that incoming MSW materials would be stored on site would be one week, which equates to 40 wet tons.

Potable Water

As reflected on Attachments III-B through III-J, hose bibs providing potable water are strategically located at the facility to provide cleaning of floor and wall surfaces. For vector control, the flooring and walls of all working surfaces associated with the unloading/tipping area at the facility are washed down following movement of MSW into the fermentation basin. Wash waters from these wash down events are routed to the floor drain system where it subsequently flows to the fermentation basin for use as process water. If necessary, wash waters can also be routed (e.g., if the fermentation basin is between batches) to the collection system for subsequent treatment at the City of Bryan's publicly owned treatment works (POTW).

Process liquids within the fermentation basin are designed to flow towards the recirculation sump situated on the southern portion of the basin building. Floor drains are situated in the sump and connected to piping installed in the concrete foundation that typically routes liquids to the liquids storage/recirculation tanks to the east of the basin. During periods where the fermentation basin is not in use (e.g., between batches, during maintenance, etc.) wash waters can be directed to the sump and subsequent treatment (e.g., filtration), if necessary, and storage for later use as process water and/or discharge to the City of Bryan's POTW.

Since wash down waters are sent directly to the fermentation basin or the collection system for the City of Bryan's POTW, accumulation of wash waters would not typically occur such that odor creation and/or vector attraction exists. When storage in one of the storage/recirculation tanks occurs, emissions from those tanks are routed to the systems air pollution control equipment, which consists of a biofilter, scrubber, and flare. Authorization to discharge wastewater to the City of Bryan's POTW is regulated per terms of Sections 122-177 through 122-186 of the City of Bryan's Code of Ordinances, which details rules by the City of Bryan with regard to water, sewers, and sewage disposal. Authorization for emissions is regulated per terms of permits by rule established by TCEQ.

In addition to potable water to support operations, adequate supply and pressure of potable water is provided to the facility for firefighting capabilities, and a fire hydrant is located at the southeast corner of the facility property.

Drainage

The drainage of storm waters at this facility is controlled. As mentioned earlier, all loading and unloading operations occur within the building, which is equipped with sloped flooring and collection drains that are routed to the fermentation basin for use as process water or the City of Bryan's POTW for subsequent treatment. While being transferred to the fermentation basin, materials are loaded from the tipping floor into the hydromulcher, which is located just outside the tipping building, where it is pumped directly to the fermentation basin. Accordingly, only materials managed in the hydromulcher area at the facility are exposed to storm water, and that area is provided with a minimum curbing height of six inches and drains connecting to the floor drain system. Any storm water flows from the hydromulcher area are routed to the fermentation basin for use as process water or the City of Bryan's POTW for subsequent treatment.

Runoff from outdoor areas within the permitted boundaries of the facility, which is not in contact with MSW, is carried away from the site via storm drains that discharge to stormwater ditches along the southern property boundary. Storm water discharges are authorized via TCEQ's Multi-Sector General Storm Water Permit.

Tipping floor area is constructed of reinforced concrete and raised in elevation with respect to surrounding grade. Building walls are constructed of metal siding, which provides for containment and prevents MSW from coming in contact with storm water.

Ventilation

Ventilation of the facility is provided for the safety and comfort of the operators and in compliance with applicable air regulations of the TCEQ's Office of Air Quality. Administrative offices and restroom areas are equipped with an air handling system under positive air pressure. The tipping building and fermentation basin, which are both fully enclosed, are maintained under negative air pressure with this air being directed to the air pollution control system for treatment through biofilter, scrubber, and/or flare prior to being emitted.

The fermentation basin operates under anaerobic conditions to facilitate conversion to energy products. As such, the unit typically operates in an environment of no oxygen, and personnel do not enter the area while in use. However, if required, a forced-ventilation fan is provided to create a safe working environment.

Sanitation

As detailed above in the discussion under potable water and elsewhere in this application, hose bibs and floor drains are provided inside the building and hard surfaces (e.g., concrete). Floors

are washed down following processing of MSW loadings (i.e., after batches). Wash waters are routed to the floor drains and pumped to the fermentation basin for use as process water and/or discharged to a POTW. Adequate connections and equipment are provided for these water cleanings. Further, as detailed in Section 4.2, run-on and run-off features are designed to prevent run-on/run-off from contacting MSW in the process areas. Employee sanitation facilities are also provided. Restroom facilities with toilets and sinks are provided in the office area. In addition, an emergency shower for use by employees is provided outside the office area. Sanitation facilities are shown on the drawings included as Attachments III-B and III-C.

Noise Abatement

With most processing equipment being enclosed within buildings, noise levels outside the building are minimized. However, noise levels within the building may be somewhat elevated as a result of these enclosures. As such, noise generated within the facility (with focus inside the buildings) is determined in accordance with provisions established in the Health and Safety Plan, which is provided as an attachment to the SOP. Accordingly, appropriate safety precautions will be required and protective measures implemented based on observed noise levels.

4.0 Surface Water Drainage

The following sections describe facility design features to prevent impacts to ground and/or surface water (and thus impacts to human health and the environment) from the management of MSW at the facility.

4.1 Discharge Authorization

The Terrabon facility has been designed and constructed to prevent the discharge of solid waste or pollutants into any waters of the state in accordance with the requirements of Section 26.121 of the Texas Water Code (Unauthorized Discharges Prohibited) and the Texas Pollutant Discharge Elimination System (TPDES). No wetlands are located on or near the permitted site. Wastewater generated by wash down events is routed to the fermentation basin for use as process water or routed to the City of Bryan's POTW for subsequent treatment. Residual process wastewater following production of end products will be routed to the City of Bryan's POTW. As such, process wastewater will not be discharged into waters of the state. All MSW transported to this facility will be retained in the delivery vehicle until it is offloaded into the processing building. MSW located within the tipping building and/or fermentation basin will not come in contact with storm water. Therefore, no waste materials can be carried by storm water

to waters of the state. The operation of this facility will not result in a discharge of waste, leachate, or sanitary water of any type into waters of the state; therefore, this facility will not be in violation of the requirements of Section 26.121 of the Texas Water Code or the TPDES program.

This facility has been designed and constructed to prevent the discharge of pollutants into waters of the state. No wetlands are located on or near the permitted site. Therefore, this facility will not be operated in violation of the National Pollutant Discharge Elimination System (NPDES) requirements per Section 402 of the Federal Clean Water Act. This facility has been designed and constructed to prevent the discharge of dredged or fill materials into waters of the state. No wetlands are located on or near the site. Therefore, this facility will not be operated in violation of Section 404 of the Federal Clean Water Act.

This facility has been designed and constructed to prevent the discharge of non-point source pollution into waters of the state. No wetlands are located on or near the site. Therefore, this facility will not be operated in violation of Sections 208 or 319 of the Federal Clean Water Act.

4.2 Run-on and Run-off Controls

The facility has been designed and constructed to prevent surface or ground water from contacting the MSW. MSW will remain in incoming vehicles until it is offloaded in the tipping building. This will substantially eliminate the potential for contact with surface water or surrounding soils.

As noted earlier, the Terrabon facility is a Type V facility and not a municipal solid waste landfill unit. Therefore, the requirements for run-on controls that apply only to a landfill unit are not applicable. Nonetheless, the fermentation building is situated on a grade that is higher than the surrounding property with loading/unloading ramps sloped up to the working floor elevation. As such, the need for run-on controls is eliminated. As part of this registration application, peak discharge from a 25-year storm was evaluated for the facility. A copy of that evaluation is provided as Attachment III-K.

MSW managed within the processing areas are totally contained within buildings. As such, no rainfall will come in contact with MSW managed at the facility. The floors of the tipping and fermentation buildings slope towards floor drain systems, which are connected to the collection system for subsequent discharge to the City of Bryan's POTW.

Storm water (i.e., outside the building) is not typically in contact with MSW, and discharges of storm water are regulated pursuant to the TCEQ's Multi-Sector General Permit.

4.3 Drainage Systems

As mentioned, the Terrabon facility generates waters from various wash down activities (e.g., tipping floor, fermentation basin, etc.) as well as sanitary facilities. The facility is designed to collect contaminated waters from each source and route it through a collection system with associated cleanouts/sumps for subsequent use as process water and/or to the collection system for the City of Bryan's POTW. Facility personnel attempt to minimize the amount of MSW in the wash down process in order to prevent clogging of sump drain apertures by first sweeping area floors clean of larger MSW material. As such, there will be no discharge of contaminated waters from the facility to Waters in the State.

Sump drains used for wash water collection and removal inside the building are designed for expected wheel loads from transport trucks and from front-end loaders. Wheel loads from these vehicles and equipment are greater than loads from MSW materials expected to be piled on top of the drains. Therefore, the drains are of sufficient strength and thickness to prevent collapse. The drains and pipes are designed and operated to function through the scheduled closure of the facility.

4.4 Drainage Calculations

The facility consists of 11.69 acres of land. The storm water management analysis for the facility is provided as Attachment III-K. Calculations to support sizing of the drainage features are also provided in Attachment III-K. The facility design complies with the requirements of 30 TAC 330.303.

4.5 Maintenance Plan

The storm water drainage system is comprised of curbing and sump drains near and inside buildings and swales and ditches on the perimeter of the property. Facility operations personnel conduct routine monitoring of the drainage system structures (e.g., drains, piping, covers, etc.) to assure that the drainage system continues to function as designed. Drain lines and ditches must remain clear of large debris that would impede drainage. If any significant sediment deposition is observed, it will be removed prior to causing a condition of blockage. Flow lines will be maintained as designed.

4.6 Erosion and Sedimentation Control Plan

Since the facility outdoor areas used for transporting, transporting, and receiving vehicles is paved and earthen drainage structures (e.g., ditches, berms, etc.) are not needed for storm water management, there is no erosion and sedimentation control plan for the facility.

4.7 100-Year Flood Protection

A copy of the 100-year floodplain for the area, along with the facility location, is provided as Attachment III-L. As indicated, the nearest 100-year floodplain in the area is indicated by and associated with Thompsons Branch, which is approximately 400 feet from the western edge of the Terrabon facility. Correlating the site grading plan for the facility (Attachments III-D and III-E) as well as topographic map (Attachment II-B of Siting Report) of the area with the floodplain map (Attachment II-K of Siting Report) yields that the approximate elevation of Thompsons Branch as occupied by a 100-year flood event is 296 feet above mean sea level (msl). The lowest elevation of the Terrabon facility as reflected on Attachments III-D and III-E is 300 feet msl (i.e., four feet above floodplain level). In the vicinity of the facility, lands to the north of the facility are generally higher in elevation. Viewing the location of the Terrabon facility on topographic maps indicates there are no other prominent surface water features in the vicinity that could impact the facility and/or be impacted by the facility. Since the Terrabon facility is outside the 100-year floodplain, the requirement to design for management of storm water from a 100-year storm event is not applicable.

5.0 Unit Design

Primary components of the Terrabon energy production process include the tipping building, fermentation basin, and liquid storage/recirculation tanks. The following drawings provide information regarding key facility components:

- Attachment III-A – Process Flow Diagram;
- Attachment III-B – Overall Site Plan;
- Attachment III-C – Operations Layout Drawing;
- Attachment III-D – Site Grading Plan - North (C-2);
- Attachment III-E – Site Grading Plan - South (C-2A);
- Attachment III-F – Site Utility Plan (C-3);
- Attachment III-G – Plant Facility Plans (P-1 and P1);
- Attachment III-H – Unloading/Tipping Sections (P2);
- Attachment III-I – Plant Facility Cross Sections (P-3);
- Attachment III-J – Plant Facility Longitudinal Section (P-4);

- Attachment III-K – Stormwater Analysis; and
- Attachment III-L – Final Closure Plan.

The Terrabon facility has units used for storage of and subsequent conversion of MSW to energy products. Accordingly, this section provides information required under 30 TAC 330.63(d)(1) and (2). For an understanding of the overall facility operations, a discussion of the major components is provided. With the exception of the hydromulcher, which is used to pump the pulped MSW to the fermentation basin, equipment at the Terrabon facility is located within buildings. It should be noted that equipment has been permitted by the TCEQ's Air Permits Division, which has reviewed operations and established operating limits.

5.1 Unloading Area

Upon entering the site, incoming MSW is typically either unloaded on the concrete floor of the tipping building; however, certain materials (e.g., liquids, slurries, etc.) may be unloaded directly into the fermentation basin. All MSW unloading and storage operations are conducted within the enclosed tipping building, which is protected from adverse weather conditions (e.g., wind or rain). Transport trucks are directed to the tipping building and appropriate location for unloading. Depending on the size of the truck transporting the MSW, the maximum number of incoming trucks would range from two (larger) to five (smaller). In the event that unloading bay(s) are unavailable when an incoming truck arrives, the incoming truck will be queued on an area with flexible base. To minimize litter dispersion during unloading operations, trucks back into the loading bays and are unloaded within this enclosed area associated with the processing building.

Since inputs to the fermentation basin must be made at smaller loading rates and the pulping process, which is situated off-site, produces larger unit quantities, storage of incoming MSW is required. For this reason, the tipping building can be provided with air conditioning, if needed, such that temperatures of 45 °F or less can be maintained.

Front end and/or tele loaders are used within the tipping building to remove and transport the MSW from the tipping floor area to a hydromulcher located outside the tipping building. From the hydromulcher, the MSW is pumped on an as-needed basis to the fermentation basin for subsequent use.

5.2 Fermentation Basin

The fermentation basin consists of a large rectangular basin where materials, water, microorganisms, and nutrients are combined in an anaerobic environment to facilitate conversion of the materials to energy products. Design details for the fermentation basin are provided on drawings provided as Attachments III-G through III-J. The following are the primary components of fermentation basin:

- Concrete basin having exterior dimensions of approximately 90 feet x 100 feet;
- Sidewall drainage trenches;
- Wet well with recirculation pumps;
- Air blower, piping, and diffusers;
- Building cover constructed of a polyvinyl chloride material;
- Exhaust fan; and
- Air pollution control equipment (biofilter, scrubber, and flare).

Materials are typically pumped into the fermentation basin via piping from the hydromulcher. Piping connections are also available such that liquid/slurry materials (e.g., septage, MSW landfill leachate) could be pumped directly into the basin on the northern side of the building via access on the perimeter road.

During the fermentation process anaerobic conditions persist during the conversion to energy products. Accordingly, significant quantities of methane, hydrogen sulfide, carbon dioxide, and/or ammonia may be present. Personnel do not enter the basin unless it is necessary due to process upsets in which case air is pumped into the vapor space to create a safe environment for workers. In this regard, the building is equipped with monitors for methane, hydrogen sulfide, carbon dioxide, ammonia, and oxygen. Emissions from the fermentation basin building are maintained in accordance with requirements of the TCEQ air quality permit, and exhaust gases are treated through a combination of biofilter, scrubber, and/or flare.

During the energy production process, products are partitioned into the liquid phase through the “broth” that is being recirculated through the basin and associated tanks. Upon culmination of the process, the broth is pumped to one of the four storage/recirculation tanks for subsequent sale. Vapors in the basin are then routed to the air pollution control equipment until sufficient drying has occurred at which time remaining solids are removed from the basin and managed as facility-generated wastes as described in the SOP.

5.3 Storage/Recirculation Tanks

As described, the four storage/recirculation tanks support operation of the fermentation process by recirculating broth and then for storing final broth (i.e., product). The tanks are constructed of fiberglass reinforced plastic, and each has a diameter of 14 feet and capacity of 30,000 gallons. The four tanks are situated within a common secondary containment structure made of concrete with rough dimensions of 20 feet by 85 feet and a wall height of 18.5 inches.

5.4 Other Equipment

In addition to units and equipment described above, the Terrabon facility typically maintains or arranges for the following pieces of other equipment to support operations:

- Tele handler for movement of pallets, etc.;
- Spare parts of key equipment components; and
- Miscellaneous equipment (e.g., hand tools) to support operations.

5.5 Alternate Processing or Disposal

In the event that the production process is not in operation and MSW is onsite, there will be management options. If the shutdown is short enough, incoming material shipments will be halted and available storage at the facility will likely be sufficient to accommodate materials on-site while the unit(s) is being brought back into service. Should the shutdown be long enough that storage limits (e.g., available storage at the facility is insufficient and/or potential for significant odor/vector attraction is high, etc.) will be exceeded, then the solid wastes can be diverted to another authorized facility.

6.0 Miscellaneous Design Features

Since the facility is an energy recovery facility and not a municipal solid waste landfill, the design features for final cover and landfill markers are not applicable.

7.0 Closure, Post-Closure, and Financial Assurance

The Final Closure Plan (Attachment III-L) has been prepared according to the requirements of 30 TAC Chapter 330, Subchapter K to detail the procedures to be used for closure of the facility. Because the facility is an energy recovery facility and does not have land-based units (i.e., is not a landfill) and because it is not located in the 100-year floodplain, no specific fill and capping is required and no post-closure plan is required.

Closure costs reflected in the Final Closure Plan have been developed to reflect “worst-case” closure requirements detailed in 30 TAC Chapter 330, Subchapter L, which include closure by a

third party and disposition of maximum inventories. At closure, all MSW will be removed and decontamination will be accomplished. The Terrabon facility is not subject to the post-closure care requirements of 30 TAC 330.463(a)(1). After all final facility closure activities have been completed, a request for voluntary permit revocation may be submitted.

After review and concurrence by TCEQ with the closure costs estimate reflected in Attachment III-L, Terrabon will submit to TCEQ's Financial Administration Division evidence of financial assurance pursuant to the requirements of 30 TAC 330.505(b) and 30 TAC Chapter 37 will be submitted.

8.0 Buffer Zone

In accordance with 30 TAC 330.543, the Terrabon facility maintains a buffer zone in excess of the 50 foot requirement. Attachments III-B and III-C reflect this buffer zone.

ATTACHMENTS TO SITE DEVELOPMENT PLAN

Attachment III-A – Process Flow Diagram

Attachment III-B – Overall Site Plan (C1)

Attachment III-C – Operations Layout Drawing

Attachment III-D – Site Grading Plan – North (C-2)

Attachment III-E – Site Grading Plan – South (C-2A)

Attachment III-F – Site Utility Plan (C-3)

Attachment III-G – Plant Facility Plans (P-1 and P1)

Attachment III-H – Unloading/Tipping Sections (P2)

Attachment III-I – Plant Facility Cross Sections (P-3)

Attachment III-J – Plant Facility Longitudinal Section (P-4)

Attachment III-K – Stormwater Analysis

Attachment III-L – Final Closure Plan

Attachment III-A

Process Flow Diagram

Attachment III-B

Overall Site Plan (C1)

Attachment III-C

Operations Layout Drawing

Attachment III-D

Site Grading Plan – North (C-2)

Attachment III-E

Site Grading Plan – South (C-2A)

Attachment III-F

Site Utility Plan (C-3)

Attachment III-G

Plant Facility Plans (P-1 and P1)

Attachment III-H

Unloading/Tipping Sections (P2)

Attachment III-I

Plant Facility Cross Sections (P-3)

Attachment III-J

Plant Facility Longitudinal Section (P-4)

Attachment III-K

Stormwater Analysis

Attachment III-L

Final Closure Plan