

Questions:

- 1 Does the Permit require modification to receive E&P wastes?
- 2 Any special reporting?
- 3 Setback requirements?
- 4 Waste Profile sheets?
- 5 Landfill SWMPs?
- 6 Any additional testing (storm water, leachate, air, etc.)?

	Does Permit Require Modification?	Any special reporting?	Setback requirements?	Waste profile sheets?	Landfill SWMPs?	Add'l testing?
MO	No, E&P waste is not identified as a prohibited waste. As a "special" waste, it may be accepted upon characterization as non-Haz. and approved by LF operator.	No, other than all "special" waste approvals are to be retained in the site operating record.	None beyond the normal landfill design setbacks of 100 feet.	Yes, must use MDNR form to document approval and retain form in site operating record.	No specific plan required. Permit application may have limited discussion of waste approval and acceptance procedures.	None due solely to E&P wastes.
AR	No, E&P waste is not identified as a prohibited waste, such as Hazardous Waste or PCB Waste.	None other than retaining the waste characterization lab results for special wastes in operating record.	None beyond the normal landfill design setbacks of 100 feet.	No specific profile sheet specified.	Yes, a Hazardous Waste Exclusion Plan is required. Plan must address role of LF personnel, wastes to be excluded, sampling and analysis procedures, random load inspections, personnel training, record-keeping and contingency.	None due solely to E&P wastes.
OK	No, E&P waste is not identified as a prohibited waste, nor is it specifically identified as Nonhazardous Industrial Waste (NHIW). Components of E&P waste would be addressed as NHIW.	No, not specific to E&P waste. Required to report monthly NHIW amounts greater than 10 cubic yards per calendar month.	None beyond the normal landfill design setbacks of 100 feet.	No specific profile sheet specified. A ODEQ NHIW Certification form is required for all NHIW wastes. This completed form is to be retained in the site operating record.	Yes, a Waste Exclusion Plan is required. The Plan is to address inspection of loads, recordkeeping, personnel training, rejected waste handling, etc.	None due solely to E&P wastes.
TX	No, E&P waste is not identified as a prohibited waste, but is included in the definition of "Special" waste.	None other than retaining the waste characterization lab results for special wastes in operating record.	None beyond the normal landfill design setbacks.	No specific profile sheet specified. A Special Waste Disposal Request Form is to be submitted to the TCEQ for approval of all special waste not specifically listed in the solid waste regulations.	No, however procedures to detect and prevent prohibited waste is to be included in the Site Operating Plan. Some LFs may submit for approval a separate Waste Acceptance Plan (WAP) that describes wastes to be accepted and characterization procedures. An WAP eliminates the requirement to obtain waste specific approval from the TCEQ.	None due solely to E&P wastes.