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Subject: The Form "Rules Comment Form" was submitted
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General Comment

Here is a new comment from the Web.

Comment

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Amend §3.8 and new/amended Chapter 4, waste management

Name

Chad Hayden

Address

575 N. Dairy Ashford

City

Houston

State

TX

Zip

77079

Business Phone, Fax

1-888-425-2832

Email Confidentiality Preference

Yes, I consent to allow the RRC to release my e-mail address.

Email Address

chad@galateatech.com

Comments concerning proposed rulemakings

My name is Chad Hayden and I am the CEO of Galatea Technologies. Galatea works with commodity producers across the globe helping companies digitalize their waste management processes. We applaud the RRC's proposed rules which will bring Texas up to the global standard in environmental compliance. Today, in Texas, we work with numerous producers to provide electronic waste manifesting within the scope of the proposed regulations. One of the gaps in the regulations that we noticed was the absence of the requirement for discrepancy handling. In other jurisdictions we have seen this requirement prove incredibly valuable as a way to ensure that what was shipped was what was received. Having a discrepancy requirement for volume, characterization and classification and incomplete documents provides a self auditing mechanism which furthers regulatory adoption and oversight. As an example, here is an excerpt from the Alberta Energy Regulator's Directive 058 focused on discrepancy handling. 3.2 Alberta Energy Regulator Reconciling Discrepancies in the Waste Form 14) The oilfield waste generator must reconcile any differences between the waste details entered in the waste form by the receiver and those entered by the generator. Discrepancies could include differences in recorded waste quantities that may be due to inaccurate measurement in the field. 15) If the discrepancy has not been reconciled within 60 days from the date of the shipment, the oilfield waste generator must notify the AER at Directive058@aer.ca. 3.2.1 Serious Discrepancies 16) The oilfield waste receiver must notify the waste generator and the transporter within 24 hours of finding a serious discrepancy regarding the quantities or characteristics of the waste shipped relative to what

was received. A serious discrepancy is one that may have resulted in an impact to the environment (e.g., spills, leaks, waste that did not arrive at the intended receiver) or one where the waste received differs significantly from the waste sent by the generator. 17) Upon being notified or becoming aware of a serious discrepancy, the oilfield waste generator must notify the AER at Directive058@aer.ca of the discrepancy as soon as possible by the quickest, most effective means available, investigate the discrepancy, and take corrective action. 18) In cases where a serious discrepancy is the result of an activity by the transporter (e.g., truck spill), the oilfield waste generator must have procedures in place for the transporter to contact them within 24 hours of the occurrence.

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Origin

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