



**CORRESPONDENCE COVER SHEET
WASTE PERMITS DIVISION
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

Date: 01/09/2019
Facility Name: STRD Transfer Facility
Permit or Registration No.: 40296

Nature of Correspondence:
☐ Initial/New
☒ Response/Revision*

*If Response/Revision, please provide previous TCEQ Tracking No.: 22990646

(Previous TCEQ Tracking No. can be found in the Subject line of the TCEQ's response letter to your original submittal.)

This cover sheet should accompany all correspondences submitted to the Waste Permits Division and should be affixed to the front of your submittal as a cover page. Please check the appropriate box for the type of correspondence being submitted. For questions regarding this form, please contact the Waste Permits Division at (512) 239-2335.

Table 1 - Municipal Solid Waste

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New Notification	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate SRC Demonstration
<input checked="" type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Statistical Evaluation
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> Subchapter T Workplan	
<input type="checkbox"/> Other:	

Table 2 - Industrial & Hazardous Waste

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CfPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Extension Request
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> 335.6 Notification	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Other:	<input type="checkbox"/> Waste Minimization Report
	<input type="checkbox"/> Other:

January 9, 2019



Email, FedEx

Mr. Terance Virtue, P.G., MSW Permits Section
Office of Waste, Permitting and Registration Division
Texas Commission on Environmental Quality
Building F, Mail Code 124
12100 Park 35 Circle
Austin, TX 78753

Re: Type V Transfer Station Registration Application- 40296-Notice of Deficiency
South Texas Refuse Disposal, Inc.
1278 CR. 532, Hondo, TX 78861
Tracking No.22993373; RN105450134/CN603317926
GSE Project No. 291290

Dear Mr. Virtue:

On behalf of South Texas Refuse Disposal, Inc. (STRD), Grove Scientific & Engineering Co. (GSE) and Environmental Business Partners, LLC (TX Reg. # F-17149) are responding to your call and emails Notice of Deficiency on January 2 and 3, 2019 relating to clarification of waste acceptance rates and operating hours for the subject Type V MSW transfer station registration application. This response has been formatted to allow revised application pages to be replaced with revised pages.

The requested original, unmarked copies, and marked copies are enclosed. One copy of this response has also been sent to the local TCEQ Region 13 office. We have also posted these revisions to the online application. We trust that our responses have adequately addressed your comments and will allow approval of the subject registration.

Sincerely,

Grove Scientific and Engineering Company

A blue ink signature of James E. Golden, written in a cursive style.

James E. Golden, P.G.
Vice President, Sr. Project Manager

A circular professional engineer seal for the State of Texas. The seal contains a five-pointed star in the center, the text "STATE OF TEXAS" around the top, and "LICENSED PROFESSIONAL ENGINEER" around the bottom. The name "WILLIAM A. DECKER" and the number "84430" are stamped in the center. A black ink signature of William A. Decker is written over the seal.

William A. Decker, P.E.
Environmental Business Partners, LLC

cc: Felimon Cuellar, STRD; TCEQ Reg. 13

Enclosures

6140 EDGEWATER DRIVE • SUITE F • ORLANDO, FLORIDA 32810-4810
PHONE (407)298-2282 • FAX (407)290-9038 • www.grovescientific.com

**Part II-TCEQ Type V Transfer
Station Application
Existing Conditions, Waste
Acceptance Plan and Land Use
Impacts**

STRD Transfer Facility
Hondo, Medina County, Texas

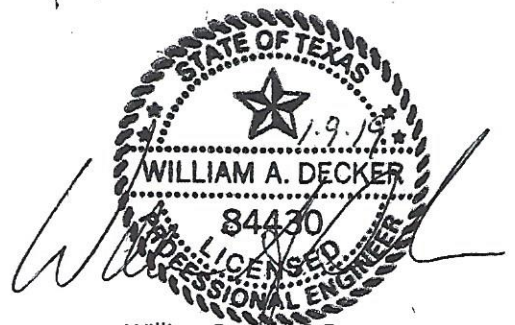
Prepared for:

South Texas Refuse Disposal , Inc.
1384 CR 532, Hondo, TX 78861

Prepared by:

Grove Scientific & Engineering Company
6140 Edgewater Drive, Suite F
Orlando, FL 32810

January 2019



William Decker, P.E.
Texas PE # 84430

**Part II Type V Transfer Station Application
South Texas Refuse Disposal-**

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Appendix B	TPDES Permit
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1.0 PURPOSE

This Part II of the transfer station application was prepared to address the requirements of Texas Commission on Environmental Quality (TCEQ) municipal solid waste (MSW) rules, Title 30 Texas Administrative Code, Chapter 330.61. for the proposed South Texas Refuse Disposal, Inc. (STRD), Hondo, Texas. The proposed Facility will process MSW household and commercial wastes, and, the subset of MSW, construction & demolition debris (C&D) as defined in TAC Chapter 330.

2.0 SITE LOCATION AND DESCRIPTION

The proposed facility location is 7.18 acres and its physical address is 1278 County Road 532, Hondo, Texas. A USGS Topographic Map (Figure 1) shows the location of the site. A recent aerial photograph within 1 mile of the site is attached as Figure 2. The residences in the vicinity are shown on Figure 3 (attached).

The facility will be a private transfer station and recycling facility, and only accept MSW and C&D from the STRD hauling routes and Citizen drop off centers primarily serving Medina County, Texas. Recyclable materials are separated from the C&D waste stream via processing within a proposed transfer station building through onsite recycling equipment, or directly loaded onto transfer trucks and hauled to a designated recycling facility. Non-recyclable materials and MSW will be placed into transport vehicles and hauled to an authorized C&D or MSW facility.

3.0 WASTE ACCEPTANCE PLAN

The STRD Facility primarily will serve the surrounding communities of the City of Hondo and Medina County. Within this County limits, the Facility is estimated to serve a population of approximately 50,066 (2017), and the City of Hondo with a population of 9,017 (2016 estimate), and other residential and commercial customers within 50 miles of the site. Both Medina County and Hondo have their own MSW collection services.

The sources of wastes expected to be received at the Facility include residential and commercial municipal solid waste, construction and demolition debris, cardboard, concrete, asphalt, wood wastes, yard trimmings, cloth, paper, glass, metal, plastic, and furniture. No Special Wastes will be accepted.

STRD estimates that a total average of 600 cubic yards of MSW, that consists of 300 cubic yards of household and commercial waste and 300 cubic yards of C&D, will be initially accepted at the facility.

The Table 1 below presents the 5-year projected waste acceptance rates, at a 10% annual rate increase.

Table 1. Projected Waste Acceptance Rates

All in Cubic Yards	Year 1	Year 2	Year 3	Year 4	Year 5
Max. Daily Amount	600	660	726	799	878
52 Saturdays	200	220	242	266	293
260 Weekdays	600	660	726	799	878
Annual Totals	166,400	183,040	201,344	221,572	243,516

Once the MSW is transferred into the 40 CY transfer trucks, it is transported to an authorized MSW landfill in San Antonio, or a similar permitted facility.

The transfer building would be planned to be expanded to 120-feet by 60-feet within 5 years. The wastes will be tipped in designated areas within the 60 foot by 60 foot enclosed transfer station building on the proposed site, see Figure 4, Site Plan. All MSW household and commercial solid wastes will be removed or transferred out of the facility daily, therefore, no MSW household wastes will be stored for more than 24 hours.

The average amount of MSW household and commercial wastes that can be stored in the transfer building is 300 CY, and for C&D another 300 CY, for a total of 600 CY of waste storage. The maximum waste storage within the transfer building is 439 CY MSW household and commercial waste, and 439 CY C&D wastes, for a total maximum of 878 CY per day. Unprocessed C&D debris will be stored for no more than a maximum of 7 days within the transfer building. The average C&D processing time will be 3 days. The estimated amount of recovered recyclables (metals, cardboard, etc.) from the C&D to be stored on the site is 1000 cubic yards, and for a period of no more than 6 months, see Site Plan for location of storage. An on-site storage area for source-separated or recyclable materials will be provided that is separate from the transfer station or process area. Control of odors, vectors, and windblown waste from the storage area will be maintained.

The percentage of C&D debris that is expected to be recycled is estimated to be from 10-25%. These recyclables will be primarily metals, cardboard, clean wood, and plastics. The method to document the percent of recyclables per the total waste received will be use the average measured weight of MSW per cubic yard hauled to the landfill at 500 lbs./CY, and for C&D the average is 300 lbs./CY. These densities will be used by STRD to calculate the total weight of all incoming wastes. Then, recyclables will be weighed at the recovery location, and those totals from weight tickets will be used to document the 10% or more recovery efficiency. These waste weights will be documented daily and monthly, and reported to the TCEQ as required. The primary processing will be manually or front-end loader for material separation. These recycled materials will be shipped to local reuse markets for re-manufacturing into products, such as Paper Retrievers and Danny's metal recyclers in San Antonio. The rejected C&D will be transported to an authorized C&D facility.

The STRD transfer station will not accept: special wastes, industrial wastes, hazardous wastes, automobile wastes, paints, used oil or liquids (other than the typical MSW contents), or medical wastes. See Part IV, Operating Plan for more details on control of unacceptable wastes.

4.0 FACILITY IMPACT

The STRD transfer station is proposed to be located within a predominately agricultural area of Medina County, see Figure 5, Zoning and land use map within 1-mile. However, there are rural residences adjacent to the eastern and southern site boundaries. STRD has been in operation as a waste hauling firm at this location since about 2012, proving to be compatible with the surrounding land uses.

Visual buffering in the form of opaque fencing, or landscaping, will be provided along those sides of the facility. In addition, the enclosed transfer station building will have walls facing the north, east and western sides on the site, to prevent litter, odors, and visual impacts to the adjacent properties. See Part III Site Development Plan for more impact mitigation details.

The daily transfer of all MSW household and commercial wastes from the facility, and cleaning of the transfer station floor, will insure that putrescible wastes do not create any odors. Also, no processing of recycled products, such as chipping or screening will be conducted to reduce potential noise generation. A cardboard baler may be added in the future. All heavy equipment will have mufflers and only be operated during business hours.

A local City of Hondo Wind Rose is depicted on Figure 6. This shows that the prevailing winds are from the southeast, or towards the side and rear of the proposed transfer station building. The orientation of the transfer building entrance to the west will prevent odors and litter from being emitted from the facility.

Traffic impacts will not be significant to CR 532 or other local roads, with only an estimated 10 hauling trucks, twice per day accessing the site, along with 6 to 10 employee vehicles, see Transportation section for more details.

There are no significant impacts anticipated to the local City of Hondo. To the contrary, STRD will provide a needed local service to collect MSW for proper disposal, and to recycle C&D debris into recovered products. Reviewing historical aerial photographs, it appears that the City of Hondo is slowly growing to the south and east along Hyw 90. Some rural residential growth is apparent over the last 20 years along CR 532. Land uses within 1 mile of the site have been stable agricultural over the last 20 years.

Medina County has no zoning code and no provision for a use permit for the proposed transfer station. The only permits required in the County are for: water wells, floodplain development, or septic systems. Local county Judges or Commissioners approve these permits. The Medina County Environmental Health Department is also reviewing this application to comment on compatibility with local land uses. STRD will provide this review to the TCEQ when available. We believe that the proposed transfer station facility will be compatible with the surround land uses.

The closest airport is the Hondo Municipal Airport approximately 4 miles to the north, see

Figure 7.

5.0 EXISTING CONDITIONS

5.1 SURROUNDING LAND USE AND ZONING

The STRD site is currently a trucking facility. Medina County has no zoning code. The surrounding land uses are agricultural and rural residential uses, see Figure 5, depicting the local land uses and growth with 5 miles of the site. Sensitive receptors, such as schools, hospitals, and commercial areas are all in Hondo, more than 2 miles north of the site. As mentioned previously, local growth has been slow and stable, with some residential growth in the area over the last 20 years. Growth trends in Hondo approximately 3 miles to the north, are to the east and west along SR 90, with little growth to the south, toward the site. Proximity to rural residences is shown on Figure 3. There are nine (9) residential properties within 500 feet of the proposed facility. The closest residences are 200 feet to the south of the site. A 50-foot setback and visual buffers will be maintained to mitigate impacts to these properties. The owner of STRD, Mr. Felimon Cuellar, owns the properties immediately to the west of the site.

5.2 WELL INVENTORY

No water wells have been identified within 500 feet of the site. A well survey was conducted by EDR within 1 mile of the site, see Figure 8, with details in Appendix A. The site, and surrounding properties are serviced water by Medina County.

The nearest oil or gas well is about ¼ mile to the south of the site.

5.3 TOPOGRAPHY

The site is relatively flat and is at an elevation of 845 feet NGVD (see Figures 1 and 4). The highest elevations are to the north at 850 feet NGVD and slopes to the south of the site at 840 feet NGVD. The site gently slopes to the west down to about 842 feet.

5.4 WETLANDS AND FLOODPLAINS

The Wetlands Inventory Map (Figure 9) does not identify any wetlands within the site. The FEMA 100-year floodplain impacts the southern 200-250 feet of the site, see Figure 10. No solid wastes are to be stored or processed in this portion of the site. Recyclable materials recovered from the C&D debris will be temporarily stored in containers in the southeastern portion of the site, outside of the floodplain. These materials will either be stored in containers or will be on rollers off the ground, and will not impact the flow or the storage needed for the 100-year flood, see Figure 4.

5.5 SURFACE WATER AND GROUNDWATER

Figures 1 and 9 depict a surface water feature approximately 1000 feet to the west of the site. This feature is an intermittent tributary to the Little Live Oak Creek to the south east of the site. There are no surface waters on the site.

The facility will comply with the Texas Pollutant Discharge Elimination System (TPDES) and the US EPA Clean Water Act. The STRD facility is currently permitted under number TXR05DW73, see Appendix B. This permit may be modified to cover the proposed transfer station development, see Part III.

Groundwater depth at the site is expected to be more than 6 feet. Flow direction is expected to be to the south-southwest. The site is not within the Edwards Aquifer recharge area.

5.6 SOILS AND GEOLOGY

The project site soils are classified as Knippa clays, see Figure 11. These soils are a class C, or have slow infiltration rates with moderate fine textures. These soils are silts and clays with low permeability rates, see Appendix A-EDR Report. The geology of the area is stable, and bedrock is below 60 inches, and is a stratified rock sequence from the Mesozoic era.

6.0 TRANSPORTATION

6.1 ACCESS ROADS

A 2-lane, 25-foot wide , 425 foot access road connects the site to CR 532. Currently, the access road is gravel. STRD plans to improve this access road by adding a 2-3 inch layer of an asphalt type sealcoat. This improvement will prevent dust and provide for an all-weather road. The interior site roads are also planned to be improved with a sealcoat. Traffic flow within the facility is depicted on Figure 4, Site Plan.

The main public access road, CR 532 is a 2-lane, 25 foot paved right of way maintained by the County. The low population density of the agricultural area results in low traffic volumes. Other local access roads within 1 mile, such as CR 462 also are expected to have low traffic volumes. TXDOT and Medina County will be consulted prior to operation as to the need for any roadway improvements.

6.2 TRIP GENERATION

Traffic is estimated by STRD at 10 dump trucks (medium -30 to 40 CYDs) per day entering the facility (20 total truck trips), six (6) employee vehicles (12 total employee trips), and two service vehicle trips (4 total service vehicle trips) at full operation. Five-year growth may increase roll-off trucks to 15. Table 1 provides the average distribution of the trip generation for the arrivals and departures throughout a typical weekday (as provided by STRD).

Table 2 Estimated Daily Trip Generation

Weekday Time Period	ESTIMATED INBOUND TRAFFIC		
	Trucks	Employees	Service
7:00 - 9:00 a.m.	4	6	1
9:00 - 11:00 a.m.	3		
11:00 a.m. - 1:00 p.m.	3		1
1:00 - 3:00 p.m.	2		
3:00 - 4:00 p.m.	3		
4:00 - 5:00 p.m.	2		
5:00 - 6:00 p.m.	2		
6:00 - 7:00 p.m.	1		
TOTAL	20	6	2

Weekday Time Period	ESTIMATED OUTBOUND TRAFFIC		
	Trucks	Employees	Service
7:00 - 9:00 a.m.	4		1
9:00 - 11:00 a.m.	3		
11:00 a.m. - 1:00 p.m.	3		1
1:00 - 3:00 p.m.	2		
3:00 - 4:00 p.m.	3		
4:00 - 5:00 p.m.	2	5	
5:00 - 6:00 p.m.	2	1	
6:00 - 7:00 p.m.	1		
TOTAL	20	6	2

The facility operating hours will be from 7:00 a.m. to 7:00 p.m. Monday through Friday and 7:00 am to 5:00 pm Saturday. The facility will be closed on Sunday. The morning peak period of the facility occurs between 7:00 a.m. and 9:00 a.m. The afternoon peak hour is 4:00 to 5:00 p.m.

Traffic will be controlled by signage and onsite personnel. A sign at the intersection of the access road and CR 532 will identify the site. A sign located at the site entrance will state facility rules, acceptable and unacceptable wastes, and direct all trucks to the transfer station building. An attendant at the building will also be directing truck traffic to the correct MSW or C&D tipping area. After dumping their load, trucks will egress via the same route. A scale will not be utilized by trucks. Volume of each truck load (10,20,30 CY) will be used to track volumes tipped at the facility. Transfer trucks picking up MSW or C&D reject waste or trucks removing recyclables will use the same route through the site.

7.0 HISTORICAL COMMISSION

STRD will provide documentation to the TCEQ of compliance with Natural Resources Code Chapter 191 (Texas Antiquities Code) prior to application completion. A request for State Historic Preservation Officer (SHPO) consultation form and information for the proposed permit has been submitted to the Texas Historical Commission, see form and review letter in Appendix C. No adverse effects, based on the location and small proposed development area, were noted.

8.0 COMMISSION OF GOVERNMENTS REVIEW

STRD will provide the TCEQ with documentation that Parts I and II of the application were submitted for review to the applicable (Alamo) Council of Governments for compliance with regional solid waste plans. Email documentation is included in Appendix C.

STRD acknowledges that they have requested a review letter from Medina County, as appropriate for compliance with local solid waste plans, see letter in Appendix C. A review letter is not a prerequisite to a final determination on a permit or registration application.

9.0 SUBCHAPTER M LOCATION RESTRICTIONS

9.1 GROUNDWATER AND SURFACE WATER

As previously stated, STRD acknowledges that the proposed site is not within the Edwards Aquifer recharge area. Existing surface water drainage patterns will not be adversely altered by the proposed facility.

9.2 FLOODPLAINS AND WETLANDS

The proposed waste storage and processing areas are not within the 100-year floodplain in compliance with rule TAC 330.63(c). The recovered recyclables containers will also not be stored within the floodplain, see Figure 4.

STRD acknowledges that the facility's construction & operations shall not cause or contribute to violations of state water quality standards, violation of any applicable toxic effluent standard or prohibition under the Clean Water Act §307; jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of a critical habitat, protected under the Endangered Species Act of 1973, or violate any requirement under the Marine protection, Research, & Sanctuaries Act

9.3 ENDANGERED SPECIES

STRD acknowledges that the operation of this facility shall not result in the destruction or adverse modification of the critical habitat of endangered or threatened species.

9.4 EASEMENTS AND BUFFER ZONES

No solid waste unloading, storage, disposal, or processing operations shall occur within any easement, buffer zone, or right-of-way that crosses the facility. No MSW wastes will be stored or processed within 50 feet of the site property line, therefore, a 50-foot buffer zone will be provided along the periphery of the site.

No solid waste disposal will occur within 25 ft. of the center line of any utility or pipeline easements but no closer than the easement, unless otherwise authorized by the TCEQ executive director.

Part IV-Operating Plan

STRD Transfer Facility
Type V Transfer Station Facility
Hondo, Medina County, Texas

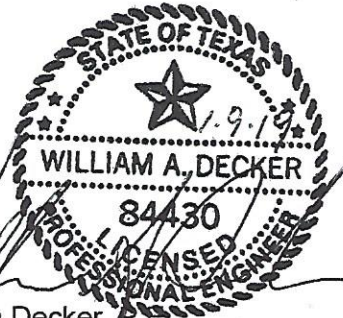
Prepared for

South Texas Refuse Disposal, Inc.
1384 CR 532, Hondo, TX 78861

Prepared by

Grove Scientific & Engineering Co.
6140 Edgewater Drive , Suite F
Orlando, FL
32810

January 2019



William Decker, P.E.
Texas PE # 84430

- Acceptable Wastes List: (see Section 4.0)
- Unacceptable Wastes List: (see Section 4.0)

The sign will be visible and readable from the facility entrance. The sign will state that the following wastes are prohibited from receipt at the facility: List all unauthorized or prohibited waste. Some site-specific examples can be industrial solid waste, hazardous waste, or PCBs and PCB items, whatever the operator has decided not to accept.

Signs prohibiting smoking will be posted near the facility entrance. A sign will be prominently displayed at the facility entrance and exit stating that all loads will be properly covered or otherwise secured prior to exiting.

7.2 FACILITY ACCESS ROAD

A 2-lane facility access road will be provided from CR 532 to the facility. The all-weather road is designed to handle the expected traffic flow, and proper truck turning radii. The facility will abide by the following aspects regarding facility access road:

Tracked mud and associated debris at the entrance to the facility and on the public roadway at the entrance to the facility and trash on public roadways will be removed at least once per day on days when mud and associated debris are being tracked onto the public roadway, to the extent that mud can be reasonably considered to be associated with facility operations.

The facility will keep records to demonstrate compliance with the requirement.

Dust from on-site and other access roadways will not become a nuisance to surrounding areas. A water source and necessary equipment or other means of dust control approved by the TCEQ executive director will be provided.

Litter and any other debris on-site and other access roadways will be picked up at least daily and taken to the collection area.

Access roadways will be regraded to minimize depressions, ruts, and potholes.

For all-weather roads within the facility to the unloading area designated for wet-weather operation, the haul roads and access roads will be constructed with appropriate materials to provide all weather access.

Tracking of mud and trash onto public roadways will be minimized by the use of asphaltic contact. For dust from on-site and other access roadways, the haul roads and access roads will be maintained in a reasonable dust-free condition by periodic spraying from a water truck.

All on-site and other access roadways will be maintained on a regular basis to minimize depressions, ruts, and potholes.

8.0 FACILITY OPERATING HOURS

The facility is will be authorized to accept waste and operate during the following timeframes: The regular waste acceptance hours from 7:00 a.m. to 5:00 p.m., Monday through Friday and from 8:00 a.m. to 12:00 p.m. on Saturday. Operation hours (for on-site waste processing, maintenance, etc.), will be

from 7:00 am to 7:00 pm, Monday thru Friday, and 8:00 am thru 5:00 pm Saturday. These hours will be posted on a sign at the entrance to the facility.

In addition, the transfer station will include alternative operating hours to accommodate special occasions, special purpose events, holidays, or other special occurrences, as notified to the TCEQ regional office. When warranted, the facility manager/supervisor will request approval from the Commission's regional office to allow additional temporary operating hours to address disaster or other emergency situations, or other unforeseen circumstances (such as traffic delays or adverse weather) that could result in the disruption of waste management services in the area. The facility manager/supervisor will document the reason or reasons for the delay for each day on which a delay occurs and place the documentation in the operating record.

In addition to the waste acceptance and operating hours, other non-waste management activities including administrative and maintenance activities may occur twenty-four hours per day, seven days per week.

9.0 VENTILATION, AIR POLLUTION AND ODOR CONTROL

Air emissions from the facility will not cause or contribute to a condition of air pollution as defined in the Texas Clean Air Act. The construction and operation of the STRD transfer facility shall comply with the air pollution control of Subchapter U of TCEQ Chapter 330.55 (relating to Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations) or other approved air authorizations. STRD will consult with the Air Permits Division on the need for an air permit.

All liquid waste and solid waste will be stored in odor-retaining containers and vessels. The facility will be designed and operated to provide adequate ventilation for odor control and employee safety. The operator will prevent nuisance odors from leaving the boundary of the facility. If nuisance odors are found to be passing the facility boundary, the facility operator may suspend operations until the nuisance is abated or immediately take action to abate the nuisance.

The owner or operator will employ the following measures:

- On-site buffer zones for odor control. An additional buffer zone of 50 feet will be utilized within the facility property boundary for odor control
- Additional waste handling procedures such as daily tipping floor cleaning for odor control when accepting putrescible waste
- Alternative ventilation and odor control measures such as misters with odor control substances will be used for odor control, if required.

Process areas that recover material from solid waste that contains putrescibles will be maintained totally within an enclosed building. Openings to the process area will be controlled to prevent releases of nuisance odors from leaving the property boundary of the facility.

Reporting of emissions events will be made in accordance with 30 TAC §101.201, Emissions Event Reporting and Recordkeeping Requirements and reporting of scheduled maintenance will be made in accordance with 30 TAC §101.211, Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements.

Any ponded water at the facility will be controlled to avoid its becoming a nuisance. In the event that objectionable odors do occur, appropriate measures will be taken to alleviate the condition such as the following actions.