



Everett Griffith, Jr. & Associates Inc.
ENGINEERS • SURVEYORS

October 26, 2023

Frank Zeng
Project Manager
Municipal Solid Waste Permits (MC 124)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087
E-Mail: frank.zeng@tceq.texas.gov

SENT VIA E-MAIL AND CERTIFIED MAIL

Re: Response to Notice of Deficiency 2
Hill Country Waste Solutions, LLC - Spring Branch Transfer Station
Spring Branch, Comal County, Texas
Municipal Solid Waste Permit Number 2419
CN605838861/RN111746988; Tracking No. 28682402
New MSW Type V Transfer Station Permit Application

Dear Mr. Zeng:

The following items are provided in response to your Notice of Deficiency letter dated September 26, 2023. For ease of reading, they are addressed in the same numerical order as provided in your letter. Each of your comments is listed in the table below (in bold) followed by the response. The location of each revision is also referenced by part, section, and page number:

NOD ID	Location	Description/Response
1	Part I, Supplementary Technical Report (Pg 4) Part II, Attachment II-H	<p>As we notified you on September 19, 2023, TCEQ's Edwards Aquifer Protection Program has indicated that this proposed facility is subject to that program's regulation. Please contact the TCEQ's Edwards Aquifer Protection Program for more information about the required authorizations and review. Submit documentation of communication with that program.</p> <p>In accordance with your prior notification, Hill Country Waste Solutions, Inc. has retained the services of TX2 Engineering to obtain the needed authorizations from the TCEQ's Edwards Aquifer Protection Program.</p> <p>A copy of correspondence is included herewith for inclusion in Part II (Attachment II-H).</p> <p>Additional updates will be provided as appropriate as the application progresses.</p>

NOD ID	Location	Description/Response
2	<p>Part I; Supplementary Technical Report, Section B.1 (Pg 2);</p> <p>Part II; Section 2.1.2 (Pg II-5); Section 2.1.5 (Pg II-7); Section 5 (Pg II-11); Attachment II-C</p> <p>Part III; Section 3.1.3 (Pg III-10); Section 9.1.5 (Pg III-18); Attachment III-B</p> <p>Part IV; Section 4.4 (Pg IV-8); Section 27.1 (Pg IV-36); Attachment III-C</p>	<p>The response did not properly address the comments. Please specify the types of activities for the C&D waste (storing, sorting, bailing, crushing, etc.). Include an anticipated timeframe when those operations will begin if it is different from other facility operations.</p> <p>Hill Country Waste Solutions, Inc. has decided not to pursue the future C&D waste storage area for this permit.</p> <p>All references to the C&D waste storage area have therefore been removed from the application.</p>
3	<p>Part II, Section 2.1.2 (Pg II-5); Section 9.2 (Pg II-17); and Section 9.2.2.F (Pg II-19)</p> <p>Part II, Section 2.1.2 (Pg II-5)</p>	<p>a. Note that "capacity" is not a parameter used and regulated in MSW rules. This word/concept used in the application may not be interpreted as a substitute of or an alternative to the "daily maximum limit of waste acceptance."</p> <p>The word "capacity" has been replaced with "daily maximum limit of waste acceptance" in the indicated sections of Part II.</p> <p>b. Clarify whether the transfer station building, and other identified storage areas have sufficient space (lateral and vertical) to safely store the specified amount of wastes (especially in the building). Revise as necessary.</p> <p>This clarification statement has been added to Part II as requested.</p>
4	<p>Part II, Section 2.1.2 (Pg II-5)</p> <p>Part II, Section 5 (Page II-11)</p>	<p>The response to the original comment states that the transfer trailer parking area is separate from the transfer station building. Revise to specify that only leak-free transfer trailers will be used.</p> <p>The indicated sections of Part II have been revised to specify that only leak-free transfer trailers will be used.</p>

NOD ID	Location	Description/Response
5	Part IV, Section 4.1 (Page IV-6)	<p>Revise to clarify whether Hill Country Waste Solutions, Inc., is a registered sludge transporter; and address the original comment. Clarify that the sludge transport (into the station, storage, and out of the station) will comply with the transporter registration conditions. If sludge transporter registration is not required for transporting the specified sludge, revise to explain/clarify as such.</p> <p>Hill Country Waste Solutions, Inc. Is a registered sludge transporter (Sludge Transporter Registration No. 25980). Only Hill Country Waste Solutions, Inc. vehicles will transport sludge to and from this facility; sludge will not be accepted by other transporters. Sludge transport into and out of the transfer station will comply with the transporter registration conditions. Storage of the sludge while at the transfer station will also comply with the conditions of the transporter registration.</p>
6	Part IV, Section 23 (Pg IV-31)	<p>Revise the first sentence in the first paragraph on the revised page 32 (per redline strike-out format) to read as "..., the operator will immediately take actions to abate the nuisance, which may include suspending operations until the nuisance is abated."</p> <p>The sentence has been revised as requested.</p>

An itemized list of the attachments that accompany this letter is provided below:

- A. **FORMS** - Form TCEQ-20714 has been completed an attached herewith. It references Tracking No. 28682402. Four (4) copies have been attached herewith.
- B. **PART I** - The following items are attached herewith to be replaced in Part I of the application:
 - Revised Cover and Table of Contents for Part I.
 - Revised Part I form (Form TCEQ-00650). The certification signature page has been signed and notarized by the applicant.
 - Revised Supplementary Technical Report.
- C. **PART II** - The following attachments are provided for replacement in Part II of the application:
 - Revised Cover and Table of Contents for Part II.
 - Revised Pages II-5 through II-7; revised Page II-11; and revised pages II-17 through II-20.
 - Revised figure entitled *Project Site at Proposed Conditions* for replacement in Attachment II-C.
 - Copies of correspondence pertaining to the Edwards Aquifer authorization to be included in Attachment II-H.
- D. **PART III** - The following attachments are provided for replacement in Part III of the application:

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- Revised Cover and Table of Contents for Part III.
- Revised Pages III-10 and III-11; and revised page III-18.
- Revised figure entitled *Schematic Diagram* for replacement in Attachment III-B.
- Revised figures entitled *Site Grading Plan, Sheet 1 of 2* and *Sheet 2 of 2* for replacement in Attachment III-C.

E. **PART IV** - The following attachments are provided for replacement in Part IV of the application:

- Revised Cover and Table of Contents for Part IV.
- Revised Pages IV-6 through IV-8; revised Pages IV-31 and IV-32; and revised Page IV-36.

An original and two (2) un-marked copies of the above listed items have been attached herewith. Where applicable, one (1) redline/strike-out copy has also been included that identifies all modifications from the previous submittal. These items have been three-hole punched to allow for replacement in the applications binders. Please note that one un-marked copy of the above items has also been sent directly to the TCEQ Region 13 Office to the attention of the Waste Section Manager, 14250 Judson Road, San Antonio, TX 78233-4480.

If you have any questions, comments, or require any additional information regarding this project, please let us know.

Sincerely,



Craig Largent

encl.

cc: Karlis Ercums, IV (President) - Hill Country Waste Solutions, LLC.
Waste Section Manager, TCEQ Region 13 Office, 14250 Judson Rd, San Antonio, TX 78233-4480