SPRING BRANCH TRANSFER STATION

MSW PERMIT No. 2419
HILL COUNTRY WASTE SOLUTIONS LLC (OPERATOR)
SPRING BRANCH, COMAL COUNTY, TEXAS

PART IV: SITE OPERATING PLAN

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This Site Operating Plan (SOP) contains information about how Hill Country Waste Solutions LLC will conduct operations at its solid waste transfer station but is not intended to be a comprehensive operating manual. The SOP represents the general instruction for facility management and personnel to operate the facility in a manner consistent with the approved design and the Texas Commission on Environmental Quality's rules to protect human health and the environment and prevent nuisances.

The site of the Spring Branch Transfer Station is located within the incorporated limits of the City of Spring Branch on U.S. Highway 281 N approximately 2,500 feet north of the intersection of Highway 281 and Jumbo Evans Boulevard in Comal County, Texas. The facility will serve as a transfer station for solid waste generated by the citizens and businesses of Comal County and adjacent counties. The facility will be operated by Hill Country Waste Solutions LLC and owned by Spring Branch Partners LLC (facility owner and landowner).

The SOP is Part IV of the MSW permit/registration application and consists of the information required by Title 30, Texas Administrative Code (TAC), Chapter 330, Subchapter E: Operational Standards for Municipal Solid Waste Storage and Processing Units, 30 TAC §330.201 - §330.249. At a minimum, the SOP must include provision for facility management and operating personnel to meet the general and site specific requirements of these rules. The sections below are divided by rule citation.

TRANSFER STATION PERSONNEL

The following table summarizes the minimum number and types of personnel located at the Spring Branch Transfer Station, along with a brief description of their required training and responsibilities:

PERSONNEL TYPES AND DESCRIPTIONS			
Position	**Number of Personnel**	**Training**	**Responsibilities**
Supervisor/ Loaders	1	The facility supervisor will be licensed in accordance with Chapter 30, Subchapters A and F. Must hold and maintain MSW Supervisor Occupational license Grade B or above.	Responsible for managing daily work operations; equipment maintenance and repair; personnel safety.
			Responsible for screening for prohibited or unauthorized waste.
			Inspect the material to be dumped and question the driver of the vehicle to be sure unauthorized waste is not dumped.
			Instruct drivers on proper use of the transfer station and aid them when needed.
			Inspect containers periodically for signs of fire and/or other potential problems
			Operates the front end loader to load the trailers
			Locking the site when it is to be unattended.
Helper	1	Trained by the Supervisor in the SOP	Moves the transfer trailers in and out of the loading area
			Controls and directs traffic entering the facility
			Wash-down transfer station (and appurtenances) when necessary
			Serve as an additional spotter for screening of waste
			Keep site free of blowing paper
Scale House Attendant	1	Trained by Supervisor in the SOP, record keeping requirements, and waste screening	Interacts with drivers and customers
			Maintain records
			Organized the movement of collection vehicles to clients and transfer vehicles to landfill

More detailed job descriptions along with written descriptions of the type and amount of introductory and continued training provided to each employee will be maintained in the facility operating record.

SECTION 2
FACILITY INSPECTION AND MAINTENANCE

The following table outlines the facility inspection and maintenance list of the facility. The facility supervisor is responsible for overseeing the performance of these tasks and performing frequent inspections to verify their completion. The inspection documentation will be retained in the operating record.

FACILITY INSPECTION AND MAINTENANCE LIST			
Item	**Task**	**Frequency**	**Reference**
Access Control	When the transfer station is not in operation (or unattended) the gates will be locked to prevent unauthorized entrance.	As needed	Section 12
Waste Screening	Inspect the material to be dumped and question the driver of the vehicle to be sure unauthorized waste is not dumped.	Per Vehicle	Section 13
Wind-blown Waste	Keep site free of wind-blown waste	At least Daily	Section 17
Inspection of fences and gates	Inspect integrity of perimeter fences and gates and repair any access control breaches as needed	At least Daily	Section 12
Facility Access Road	Inspect facility access road	At least Daily	Section 19
	Maintenance of facility access road	As needed	Section 19
Waste spilled on route to the facility	Police the entrance areas and all roads at least 2 miles in either direction from the facility entrances for loose trash. Clean up as necessary.	Daily	Section 10
Wash-down	Wash-down all working surfaces at the transfer station that have come into contact with waste	Twice Weekly	Section 22
Sweeping	Sweep all working surfaces at the transfer station that have come into contact with waste	Daily	Section 22
Walking Floor Trailer	Inspect periodically for signs of fire and/or other potential problems	At least Daily	Section 11
	Empty and replace the transport container	As needed	Section 7 and 8
Odor	Inspect the perimeter of the facility to access the performance of facility operations to control odor.	Daily	Section 22
Facility signs	Inspect all facility signs for damage, general location, and accuracy of posted information.	Weekly	Section 16

Personnel training records will be maintained in accordance with §330.219(b)(2). Personnel operator licenses issued in accordance §30, Subchapter F, Municipal Solid Waste Facility Supervisors, will be maintained as required:

3.1 SUPERVISOR - The owner or operator will ensure that the transfer station supervisor is knowledgeable in the proper operation of a municipal solid waste facility and the current operational standards required by the TCEQ. The facility supervisor will be licensed in accordance with Chapter 30, Subchapters A and F. The supervisor will be experienced and will maintain a Class B license (or higher). The supervisor will ensure that all personnel are properly trained and are operating the transfer station in accordance with this SOP and operational standards required by the permit/registration and the TCEQ municipal solid waste regulations. During situations when the supervisor is temporarily off-site and other personnel temporarily assume his duties, the supervisor will ensure that those personnel have equivalent training to that licensed position.

3.2 PERSONNEL TRAINING PROGRAM - The personnel training program will be directed by a person trained in waste management procedures, and will include instruction that teaches facility personnel waste management procedures and contingency plan implementation relevant to the positions in which they are employed.

3.3 NEW EMPLOYEE TRAINING - New employees will receive a comprehensive overview of all aspects of transfer station operations, focusing on information that is necessary to protect the health and welfare of the new employee and enable them to perform their duties in accordance with this SOP and operational standards required by the permit/registration and the TCEQ municipal solid waste regulations. Initial training subject matter will included applicable requirements found in the Site Development Plan (SDP), attachments to the SDP, the SOP., and general safety procedures. Following the initial training, the new employee training will continue during monthly training sessions, during on-the-job training, and during the annual review of their initial training. Personnel filling the scale attendant and equipment operator positions will have the equivalent training to the Supervisor so that they have the ability to temporarily assume his or her duties if off-site.

3.4 TRAINING MEETINGS - Training meetings will be scheduled and conducted for all employees at least once per month. If a regular monthly meeting is canceled, it will be rescheduled or combined with the scheduled training the next month. Training sessions will be scheduled to allow facility operations to be uninterrupted. Records of personnel attending each training session and the topics covered will be maintained at the facility.

The monthly safety training will include fire safety on a monthly basis. Additional topics for training may vary, but will be conducted annually for the following:

- Safety
- Emergency response
- Litter control and windblown waste pick-up
- Waste screening
- Prohibited waste management
- Random inspection procedures

3.5 REVIEW OF INITIAL TRAINING - Facility personnel will take part in an annual review of their initial training. A written description of the type and amount of introductory and continued training provided to each employee will be maintained in the facility operating record.

4.1 AUTHORIZED WASTES - The wastes that can be accepted at this site are municipal household and commercial solid wastes, and construction debris generated by residents of Comal County and surrounding counties or municipalities.

Also, a portion of the Transfer Station building will be set aside and designated as a sludge storage area. Treated and de-watered municipal sewage sludge from local wastewater treatment plants will be stored there in its own covered bins, separate from the rest of the solid waste at the facility. These bins will be constructed of stackable concrete blocks. The modular nature of the concrete blocks allows for the bins to be disassembled and relocated within the transfer station building if needed. When full, the contents of the container will be loaded into an end dump trailer with sealed rear tailgate and then will be transported to a TCEQ permitted beneficial use site for disposal.

No medical waste, hazardous waste, Class I waste, or electronic waste will be accepted at this facility. None of the items listed under Prohibited Wastes (Section 4.2 below) will be accepted at this facility. No constituent or characteristic of these wastes is expected to be a limiting parameter that will impact or influence the design and operation of the facility.

Hill Country Waste Solutions, LLC currently provides service to approximately 13,000 residential customers and 1,500 commercial clients. Those numbers are expected to increase significantly by the time this facility opens due to recent development and population growth in their service area. The design for this facility is based on a daily maximum limit of waste acceptance of 1,500 tons of waste per day ultimately. However, at the beginning of operations the maximum daily rate of solid waste received is expected to be less than that based on their current operations. At no time will the amount of waste accepted at this facility exceed the permitted maximum of 1,500 tons per day. This facility will not accept regulated hazardous waste. The facility supervisor will accept no waste that he or she is unsure.

The facility will be equipped with walking floor trailers. Each trailer will be filled and dispatched to an approved landfill as rapidly as possible. In the event that the trailer is not able to be dispatched immediately, then it will be tarped and the sealed trailer will be staged in the transfer trailer parking area (a parking area with road base that is separate from the transfer station building) until transport to the landfill becomes available. Under normal operating conditions, solid waste should be hauled to the landfill at least once per day. In no event will the solid waste be stored at the transfer station longer than 72 hours per week. At no time will the amount of waste stored overnight exceed 900 tons per day. At full capacity, It is anticipated that the incoming waste will be approximately 80% residential and commercial solid waste, approximately 17% roll-off waste, and approximately 3% sludge; these relative percentages are also applicable to the division of wastes stored on-site. At full capacity with a permitted daily waste acceptance limit of 1,500 tons, this would equate to: 1,200 tons of residential/commercial waste; 255 tons of roll-off; and 45 tons of sludge. Based on a maximum of 900 tons of waste stored overnight, this would equate to: 720 tons of residential/commercial waste; 153 tons of roll-off waste; and 27 tons of sludge. Waste that is stored on-site will be located within the transfer station building (in closed containers as required or on the working floor) or in tarped transport trailers that are staged within the transfer trailer parking area.

4.2 PROHIBITED WASTES - The Spring Branch Transfer Station will only accept household and commercial solid waste, and construction debris. This waste will not contain special wastes. No hazardous wastes will be accepted. A portion of the Transfer Station Building will also be set aside as a designated area for the temporary storage of treated and de-watered municipal wastewater treatment plant sludge.

The facility supervisor will accept no wastes that he or she is unsure of. The solid wastes accepted at the facility shall not contain and the transfer station will not accept the following:

- Large Items - Items that will not fit in the box will not be accepted.

- Containers containing liquids will not be accepted.
- Empty or Full Containers that are marked with a skull and cross bones, marked Hazardous, or labeled as a chemical container will not be accepted.
- Dead animals (or live animals) will not be accepted.
- Industrial wastes will not be accepted.
- No hazardous waste will be accepted.
- No liquids or sludge will be accepted (other than the treated de-watered municipal sewage sludge listed above).
- No ashes will be accepted.
- No medical wastes will be accepted.
- No gasoline or diesel fuel will be accepted.
- No chemical wastes will be accepted.
- No whole used or scrap tires.
- Special Wastes - This facility will not accept special wastes as defined in 30 TAC §330.3(154).
- Batteries - This facility will not accept lead acid storage batteries
- Chlorinated Fluorocarbons - Items containing chlorinated fluorocarbons (CFC's), such as refrigerators, freezers, and air conditioners, will not be accepted.
- Regulated Asbestos Containing Materials (RACM's) will not be accepted at this facility.
- Polychlorinated Biphenyls (PCBs) wastes, as defined under 40 Code of Federal Regulations, Part 761.

4.3 MEASURES FOR CONTROLLING PROHIBITED WASTES - Procedures to detect and control the receipt of prohibited wastes include:

- The facility will be utilized by Hill Country Waste Solutions LLC as a transfer station. However, Hill Country Waste Solutions, LLC intends to allow the public to have access to the facility. Procedures will call for all customers (both regular and one-time) and drivers of incoming waste hauling vehicles that have indicated they will deliver waste to the facility to be informed by: (1) Posting one or more signs at the facility listing prohibited wastes; and (2) Providing all customers, vehicle drivers and transfer station operators with a written list of prohibited wastes.
- Facility personnel will be trained to inspect vehicles and identify regulated hazardous waste, polychlorinated biphenyl (PCB) waste, and other prohibited wastes. They will also be trained in inspection procedures for prohibited waste. The personnel will be trained on an on-the-job basis by their supervisors. Records of employee training on prohibited waste control procedures will be maintained in the facility operating record. The personnel will be trained to look for the following indications of prohibited waste: (1) Yellow hazardous waste or PCB labels; (2) DOT hazard placards or markings; (3) Liquids; (4) 55-gallon drums; (5) 85-gallon overpack drums; (6) Powders or dusts; (7) Odors or chemical fumes; (8) Bright or unusual colored wastes; or (9) Sludges.
- Random inspections of incoming loads in accordance with the procedures described in this section.

- Maintaining records of all inspections.
- Notification of the Executive Director of any incident involving a regulated hazardous waste or a PCB waste.
- Remediation of any regulated hazardous waste or PCB waste discovered at the facility in accordance with 30 TAC §335.349.

If transfer station personnel identify any of the above indications with an incoming load, then that load will be directed to an area out of the flow of traffic, and the personnel will further assess the load. If the load is determined to contain prohibited waste or if there is any possibility that it may be prohibited waste, the load will be rejected and directed back to the generator. The supervisor will be diligent in looking for trucks bringing in waste loads from potential sources of prohibited waste such as industrial facilities, microelectronics manufacturers, electronic companies, metal plating industry, automotive and vehicle repair service companies, and dry cleaning establishments.

4.4 WASTE ANALYSIS - Walking floor trailers will be utilized at the facility to transfer waste from the transfer building to an approved landfill for final disposal. Each walking floor trailer will be of the 130 cubic yard variety with a legal carrying capacity of 26 tons. This will require approximately 58 trailer loads per day at the maximum permitted limit of 1,500 tons of municipal waste. These trailers will be driven down the ramp to the loading area on the south side of the transfer building where waste will be loaded onto them from the working floor. When full, the trailers will be covered and removed from the loading area and either driven directly to the receiving landfill or staged for transport in the transfer trailer parking area. Note that the transfer trailer parking area is separate from the transfer station building.

Only wastes that conform to the landfill's permit will be sent to the landfill. Under normal operating conditions, municipal solid waste should be hauled to the landfill at least once per day. In no event will the solid waste be stored in the box at the transfer station longer than 72 hours. All of the landfills in the area are closed on Sundays and on select holidays. The 72 hours of storage would allow for those times when the landfills are closed on Sunday with a holiday on the following Monday. Under normal circumstances the longest time that municipal solid waste would be stored on-site would typically be from Friday afternoon to Monday morning (around 60 hours). At no time will the amount of stored waste exceed the ultimate capacity of the facility.

Similarly, it is also proposed that the facility be equipped with a dedicated C&D roll-off recycling facility in the future. When the C&D recycling and storage area becomes operational, those materials will be stored on-site for a maximum of 7 days. The C&D roll off recycling area will consist of an enclosed building and qualified containers will be provided as needed to be consistent with the requirements of 30 TAC §330.245 and §330.209.

It is anticipated that the treated and de-watered municipal sewage sludge will be stored on-site for no longer than 72 hours.

At no time will the amount of stored waste exceed the ultimate capacity of the facility.

FACILITY-GENERATED WASTES [30 TAC §330.205]

30 TAC 330.243 requires that working surfaces at processing facilities that operate on a continuous basis be swept daily and washed down at least two times per week. In compliance with that requirement, all working surfaces that come into contact with solid waste at the Spring Branch Transfer Station will be swept daily and washed down at least twice weekly. However, complying with that requirement will result in wash-water being generated at the facility. This wash-water is the only liquid waste expected to be generated by this transfer station. It will be managed in accordance with TAC §330.207 (Contaminated Water Management). Refer to Section 6 below for more information.

As noted in Section 4 (above) this facility accepts municipal household and commercial solid wastes, and construction debris generated by residents of Comal County and surrounding counties or municipalities. The working surfaces at the facility that come into contact with this solid waste will be washed-down at least twice per week and more often if odors or unsightly conditions prevail. The wash-water generated from washing-down the working surfaces is expected to contain some small percentage of waste from washing-down the working surfaces but will mostly consist of water. In other words, the exact concentration of waste in the wash-water will vary from day to day depending on circumstances and the amount of cleaning necessary but will be a very small percentage of the total volume of wash-water generated.

The wash-water will be emptied from the holding tank on an as-needed basis by a certified hauler and disposed of at a TCEQ approved and permitted facility. Documentation that the wash-water can be adequately managed by other authorized facilities will be obtained from the TCEQ approved facility prior to disposal in accordance with 30 TAC §330.205(a).

All wastes generated by a facility must be processed or disposed at an authorized solid waste management facility in accordance with 30 TAC §330.205(b).

SECTION 6
CONTAMINATED WATER MANAGEMENT [30 TAC §330.207]

All contaminated water generated at the facility will be managed as contaminated water in accordance with 30 TAC §330.207. No contaminated water is allowed to pond at the transfer station or to run off as surface drainage.

As noted in Section 22 (below), the working surfaces at the facility will be washed at least twice per week and more often if odors or unsightly conditions prevail. Washing-down the working surfaces will result in wash-water being generated at the facility. Wash-water is the only liquid that will be generated at the facility during normal operations. All wash-water resulting from the operation of the transfer station will be disposed of in a manner that will not cause surface water or groundwater pollution. The facility will be equipped with drains in the pit area to direct wash-water to a sump from which it will be pumped to an above-ground contaminated water holding tank. The holding tank will be emptied on an as-needed basis and the contents taken to a TCEQ approved facility for disposal. The holding tank will be equipped with a concrete berm to provide secondary containment for the worst case spill or release from that unit should the tank ever be compromised. In the unlikely event that a breach of both the tank and the berm occurs, then the unit will be repaired or replaced and all affected areas will be remediated by removing contaminated soil and transporting it to a TCEQ approved facility for disposal and then replacing it with clean backfill.

Portable restrooms will be provided at various locations to serve the public and employees of the facility. The portable restrooms will be cleaned, maintained, and emptied on a regular schedule and the contents hauled to a TCEQ approved facility for final disposal. The facility will not discharge to a septic system.

The operator will not discharge contaminated water without specific written authorization. Any rain water coming into contact with the waste will be collected in the holding tank as described above.

At a minimum, effluent from the holding tank will be analyzed annually for TPH, fats, oil and grease, and pH. Other tests will be conducted per requirements by the facility that receives the effluent. Records of each analysis will be maintained at this facility for a minimum of three years. All sampling and analyses will be done according to EPA approved methods.

STORAGE REQUIREMENTS [30 TAC §330.209]

Each walking floor trailer will be filled and dispatched to a TCEQ approved landfill as rapidly as possible. In no event will the solid waste be stored in the box at the transfer station longer than 72 hours. At no time will more than 900 tons of waste be stored at this facility.

All solid waste at the transfer station will be accommodated in such a manner that it does not constitute a fire, safety, or health hazard or provide food or harborage for animals and vectors, and shall be contained so as not to result in litter. Storage containers of an adequate size and strength, and in sufficient numbers, will be utilized at the facility to contain all solid waste generated in the period of time between collections.

APPROVED CONTAINERS [30 TAC §330.211]

The Spring Branch Transfer Station is equipped with walking floor trailers. These trailers are loaded by the Hill Country Waste Solutions LLC personnel from the working floor of the transfer building. The trailers are filled, loaded onto transport trucks, and driven to the receiving landfill. When a trailer is filled, it will be covered and dispatched to the receiving landfill or be staged in the transfer trailer parking area. A new trailer will then be moved down the ramp to begin receiving waste. Note that the transfer trailer parking area is separate from the transfer station building.

All solid waste containing food wastes will be stored in covered or closed odor-retaining containers that are leakproof, durable, and designed for safe handling and easy cleaning. The containers must be maintained in a clean condition so that they do not constitute a nuisance and to retard the harborage, feeding, and propagation of vectors. The mechanically handled containers are designed to prevent spillage or leakage during storage, handling, and transport.

All containers to be emptied manually will be capable of being serviced without the collector coming into physical contact with the solid waste.

Walking floor trailers will be utilized at the facility to transfer waste from the transfer building to an approved landfill for final disposal. Each walking floor trailer will be of the 130 cubic yard variety with a legal carrying capacity of 26 tons. This will require approximately 58 trailer loads per day at the maximum permitted waste acceptance rate limit of 1,500 tons of municipal waste.

CITIZEN'S COLLECTION STATIONS [30 TAC §330.213]

No citizen collection station will be located at this facility.

SECTION 10

RECORD KEEPING AND REPORTING REQUIREMENTS [30 TAC §330.219]

A copy of the permit/registration, the approved application, site operating plan, and any other required plan or other related document will be maintained at the Spring Branch Transfer Station on-site at the office. An as-built set of construction plans and specifications will also be maintained there. These plans and specifications will be furnished upon request to TCEQ representatives and made available for inspection by both TCEQ representatives and other interested parties in accordance with 30 TAC §330.219(a). These plans and documents are part of the facility operating record.

The operating record will be maintained in an organized format which will allow information to be easily located and retrieved. All information contained within the operating record and the different required plans will be retained during the active life of the facility until after certification of closure.

The following records will be kept, maintained, and filed as part of the facility operating record. Log books and schedules may be used.

- Access Control Inspection and Maintenance
- Daily Litter Pickup
- Windblown Waste and Litter Control Operations
- Access Roadway Maintenance
- Fire Occurrence Notices, if applicable
- Documentation of Compliance with Approved Odor Management Plan
- Records of quantities of daily accepted waste and quantities of waste stored overnight (to ensure that the permitted levels are not exceeded)

In addition to the plans and documents listed above, the information listed in the following table will be recorded and retained in the operating record. This information will be placed in the operating record within seven working days of completion or upon receipt of analytical data, as appropriate. The owner or operator will sign all reports and other information as required by 30 TAC § 330.219.c.

OPERATING RECORD	
Records To Be Maintained	**Rule Citation**
All location-restriction demonstrations	§330.219(b)(1)
Inspection records and training procedures	§330.219(b)(2)
Closure plans and any monitoring, testing, or analytical data relating to closure requirements	§330.219(b)(3)
All cost estimates and financial assurance documentation relating to financial assurance for closure	§330.219(b)(4)
Copies of all correspondence and responses relating to the operation of the facility, modifications to the permit/registration, approvals, and other matters pertaining to technical assistance	§330.219(b)(5)
Any other document(s) as specified by the approved permit/registration or by the executive director	§330.219(b)(7)
Trip tickets	§312.145 §330.219(b)(8)
Alternative schedules and notification requirements if applicable	§330.219(g)
Inspection records and training procedures relating to fire prevention and facility safety	§330.221

OPERATING RECORD	
Records To Be Maintained	**Rule Citation**
Access control breach and repair notices	§330.223
Waste unloading/prohibited waste discovery	§330.225
Record of alternative operating hours (if applicable)	§330.229(b)

The facility will provide the quarterly and annual reports required by 30 TAC § 330.675 to the Executive Director. Records will be maintained on-site availabe to the TCEQ.

Any person signing a report shall make the certification in 30 TAC 305.44(b).

FIRE PROTECTION [30 TAC §330.221]

In the event of a fire, the facility supervisor will immediately call the Spring Branch Volunteer Fire Department by dialing 911. In addition, if it can be safely accomplished, the facility supervisor will attempt to extinguish the fire with a hand-held fire extinguisher provided at the site. This fire protection plan will comply with local fire codes.

The facility supervisor will be trained to observe incoming loads in the transport vehicles to ascertain that there is no fire in the load while performing his inspection. If a fire is observed, the vehicle will unload on a designated area of paved ground.

11.1 FIRE PROTECTION - The following steps are taken regularly by facility personnel in order to prevent fires:

- Check every load for fire before it is unloaded. Be alert for signs of burning waste such as smoke, steam, or heat being released from incoming waste loads.
- Do not allow open flames in the unloading areas or near the boxes.
- Keep the grass within the site area mowed and do not allow grass, leaves, trash, or other combustibles to accumulate.
- Do not keep fuel or other combustibles in non-approved containers.
- Inspect the fire extinguisher to ensure it is in operating condition, that it does not have an expired date, and be aware of where it is.
- This will be a "No Smoking" facility.
- Routinely clean equipment that is used to move waste with high pressure water or steam cleaners. The high pressure water or steam cleaning will remove combustible and caked material which can cause equipment overheating and increase fire potential.

11.2 PROCEDURES IN THE EVENT OF A FIRE - The facility staff will take the following steps if a fire is discovered:

- Contact the Spring Branch Volunteer Fire Department by calling 911 or (830) 885-7151
- Alert other facility personnel.
- Assess the extent of the fire, possibilities for the fire to spread, and alternatives for extinguishing the fire.
- If it appears that the fire can be safely fought with available fire extinguisher(s) until the arrival of the Fire Department, attempt to contain or extinguish the fire. Under no circumstances shall the transfer station personnel place themselves or anyone helping them in danger of being injured.
- Upon arrive of Fire Department personnel, direct them to the fire and provide assistance as appropriate.
- Be familiar with the use and limitations of firefighting equipment available on-site. Do not attempt to fight the fire alone or without adequate personal protective equipment.

11.3 FIRE EQUIPMENT - Dry chemical fire extinguishers shall be provided for all structures, waste management equipment, and vehicles at the facility. The office/scale house and transfer building will

each be equipped with a 5 lb ABC Dry Chemical Fire Extinguisher. The garbage trucks will each be equipped with 10 lb ABC Dry Chemical Fire Extinguishers. All fire extinguishers at the facility will be inspected on an annual basis and recharged as necessary by a qualified service company. The extinguishers will display a current inspection tag. Inspection and recharging of extinguishers will be performed following each use. A telephone is also available at the site to call the Fire Department.

An adequate supply of water at sufficient pressure for fire fighting is supplied to the facility a private water well and/or Canyon Lake Water Service Company's public water supply system. In addition, the Spring Branch Volunteer Fire Department (3 miles away) will be the first responder to the facility in the event of a fire. The fire department is equipped with fire trucks that carry their own supply of water for fighting fires.

11.4 FIRE PROTECTION TRAINING - Transfer station employees will receive fire safety training when hired. They shall also be given instructions on fire fighting techniques and given safety precautions to ensure their well being. The training of on-site personnel in firefighting techniques, fire prevention, response and the fire protection aspects of this Site Operating Plan will be provided by local volunteer fire departments or other established professionals on an annual basis.

Training shall include fighting all types of fires (including vehicle fires) that could occur from material deposited in the transfer station. The local volunteer fire departments will be given information on the types of materials that it is possible for the transfer station to contain so that the Fire Department may use proper techniques.

Personnel will be familiar with the use and limitations of firefighting equipment available on-site. Records of this training will be included in the operating record. Personnel will not attempt to fight the fire alone or without adequate personal protective equipment.

11.4.1 FIRE FIGHTING METHODS - There are four components necessary to start and sustain a fire: (1) Fuel or Reducing Agent; (2) Heat; (3) Self-sustaining chemical reaction; and (4) Oxygen or oxidizing agent. A fire can be extinguished by taking away any of those four components. The most common methods available to accomplish this by facility personnel are as follows:

- Chemical Flame Inhibition - This utilizes dry chemical or halogenated agents to interrupt the combustion reaction and stop flaming. This method is effective on gas and liquid fuels because they must flame to burn.

  Chemical flame inhibition can be provided by the hand-held fire extinguishers that are provided at the facility. Small fires might be controlled with these extinguishers.

- Application of Water - The application of water does several things to help extinguish a fire. First of all, water vaporizes when it comes into contact with the fire and the conversion from a liquid to steam absorbs massive amounts of heat. Without heat, the fuel no longer has the conditions required to sustain the fire. In addition, the steam also dilutes the oxygen in the air and can lower it to a concentration below the minimum amount that is required for the flame to burn.

  The application of water can be provided by on-site water hoses using the pressurized water provided to the facility by the public water system.

- Fuel Removal - Removing fuel that is in the path of the fire will help to contain fire and prevent its spread. If it can be done safely, burning material should be separated from other waste. Similarly, if a fire is too large to be effectively extinguished it may be more feasible to isolate it and allow it to burn until all of its fuel is consumed, at which point the fire will self-extinguish.

11.4.2 WATER SUPPLY - The potable water at this facility is obtained from either a private water well

or from the Canyon Lake Water Service Company's water distribution system. Both sources are capable of providing the facility with an around-the-clock supply of potable water.

11.5 TCEQ NOTIFICATION - After any fire (related to waste management activities that cannot be extinguished within 10 minutes of discovery) occurs, the TCEQ regional office will be contacted. The notification to the regional office will include:

- Contacting by telephone as soon as possible, but no later than 4 hours following fire discovery, and
- Providing a written description of the cause and extent of fire and the resulting fire response within 14 days of the fire detection.

The facility will provide to the appropriate TCEQ regional office as much information as possible regarding the fire and fire-fighting efforts, as soon as possible after the fire occurs.

The fire prevention and fire control procedures for the facility will be revisited following the occurrence of a significant fire to determine if modifications are warranted.

Public access will be controlled to minimize unauthorized vehicular traffic, unauthorized and illegal dumping, and public exposure to hazards associated with waste management.

12.1 FACILITY SECURITY - The entire transfer station will be enclosed within intruder-resistant fencing. The entrance will be equipped with lockable gate. Facility personnel will inspect the integrity of the fence and gate on a daily basis on the days when the facility is in operation. Any access control breaches will be repaired as needed. The following schedule and notification requirements will be complied with for any access breach:

SCHEDULE FOR AND NOTIFICATION REQUIREMENTS FOR ACCESS BREACHES		
Requirements	**Access Breach**	
	If Repaired Within 8 Hours	**If Not Permanently Repaired Within 8 Hours**
Notify TCEQ Region Office of the breach and repair	Not Required	Within 24 Hours
Make temporary repairs	Not Required	Within 24 Hours
Make permanent repairs	Within 8 Hours	Within the schedule submitted to the TCEQ Regional Office in the initial phase
Notify TCEQ Regional Office when permanent repair is completed	Not Required	Within the schedule submitted to the TCEQ Regional Office in the initial notice

12.2 VEHICLE ACCESS - The transfer station is equipped with all-weather drives to allow vehicular access to the facility. This roadway has been designed to accommodate the expected traffic flow and is equipped with two travel lanes to provide safe on-site access for commercial collection vehicles. The paved entry driveways and gravel surface will eliminate dust and mud being tracked to and from the facility. The roadway design includes adequate turning radii for vehicles that will use the roadway and to avoid the disruption of normal traffic patterns. Vehicle parking is also provided for employees, equipment, and visitors. Access will be provided during waste acceptance hours. Entrance gates will be locked when the facility is unattended. Operating and transport unit storage areas will be located within the perimeter security fencing.

Traffic will enter from Highway 281 through the gate on the east side of the site via the 2 lane all weather driveway and then proceed to the transfer building. Appropriate signage will be utilized to indicate where vehicles are to unload. Additional signage will be posted to discourage indiscriminate dumping.

The unloading area will be monitored by the facility supervisor (or approved designee). Public users of the facility will be directed to the tipping floor within the transfer station building to unload their waste. It is the responsibility of the facility supervisor to inform persons using the transfer station when they are violating the regulations of the transfer station. If they refuse to take corrective action or continue to violate those regulations, the supervisor shall immediately notify the Comal County Sheriff's Office and/or the Spring Branch Police Department at 911 and request assistance.

UNLOADING OF WASTE [30 TAC §330.225]

13.1 INSPECTION - The facility supervisor will inspect each load as it is unloaded:

- The facility supervisor shall inspect the load as best he or she can before it is unloaded to ascertain that the waste is acceptable at this facility.
- Any inappropriate waste should not be unloaded. If it is unloaded, it must be picked up immediately by the hauler and removed from the site.
- The facility supervisor is responsible to prevent inappropriate loads from entering the site. If, at some future date, the facility allows public access, then the facility supervisor will have the authority to refuse to accept a load if, in his or her judgement, it is inappropriate. If a hauler is not cooperative, the Comal County Sheriff should be called at 911 or (830) 620-3400. If a vehicle appears to have a fire in the waste, allow the hauler to unload this waste on the parking area and call the Spring Branch Fire Volunteer Department by dialing 911 if there is a fire. If a hauler deposits an illegal waste and departs from the site, the facility supervisor should attempt to determine the license plate number and a description of the vehicle and hauler. Do not attempt to physically restrain the hauler.

13.2 UNLOADING AREA - Municipal solid waste is delivered to the facility by Hill Country Waste Solution, LLC's collection trucks. The facility is equipped with all-weather drives and a retaining structure. Waste will be unloaded into walking floor trailers from the working floor of the transfer station building. The waste deposited into the trailers will be hauled to a TCEQ approved landfill for final disposal.

Facility personnel will oversee public users and direct them to the tipping floor within the transfer station building to unload their waste.

30 TAC §330.225(a) states that "*the unloading of solid waste shall be confined to as small an area as practical*". The unloading of solid waste at this facility will be confined to the area of the working floor and loading dock of the transfer building. The owner or operator is not required to accept any solid waste that he or she determines will cause or may cause problems in maintaining full and continuous compliance with TCEQ requirements.

The unloading of waste in unauthorized areas is prohibited. Trained personnel will be present at the facility at all times during operating hours to monitor all incoming loads of waste and direct traffic to the appropriate unloading area. Facility personnel will be familiar with the rules and regulations governing the various types of waste that can or cannot be accepted into the facility and will have a basic understanding of both industrial and hazardous wastes and their transportation and management requirements. Any waste deposited in an unauthorized area will be removed immediately and disposed of properly. The unloading of prohibited wastes (as described in Section 4) is not allowed. Any prohibited waste will be returned immediately to the transporter or generator of that waste. The transporter may be advised where the waste may be managed or disposed of legally and will be responsible for the proper handling of this waste. In the event that the unauthorized waste is not discovered until after the delivery vehicle has gone, the waste will be segregated and controlled as necessary. The facility supervisor will make an effort to identify the entity that deposited the prohibited waste and have them return to the facility and property dispose of the waste. In the event that identification is not possible, the supervisor will notify the TCEQ and seek guidance on how to remove and dispose of the waste as soon as practical. A record of the unauthorized waste will be maintained in the operating record.

Appropriate signage will be utilized to indicate where vehicles are to unload. Additional signage will be posted to discourage indiscriminate dumping.

SECTION 14

SPILL PREVENTION AND CONTROL [30 TAC §330.227]

The requirements in 30 TAC §330.227 requires that storage and processing areas be designed to control and contain spills and contaminated water from leaving the facility.

The transfer station will be designed to collect all contaminated water and direct it to an above-ground holding tank. Containment drainage controls will be designed to be adequate for the 25-year, 24-hour storm event. The facility will be designed to control and contain a worst case spill or release. No contaminated water will be allowed to pond on the surface or run off as surface drainage. All wash-water resulting from the operation of the transfer station will be disposed of in a manner that will not cause surface water or groundwater pollution.

Portable restrooms will be provided at several locations at the facility to serve employees and visitors. These portable restrooms will be maintained, cleaned, and emptied on a regular schedule. The contents will be transported to a TCEQ approved disposal facility.

The transfer building's working floor and loading area will be equipped with drains to collect wash-water and any rainwater that may come into contact with the waste and direct it to an above-ground holding tank. The holding tank will also be equipped with a concrete berm for secondary containment that is designed to be large enough accommodate a worst case spill or release. In the unlikely event that a breach of both the tank and the berm occurs, then the unit will be repaired or replaced and all affected areas will be remediated by removing contaminated soil and transporting it to a TCEQ approved facility for disposal and then replacing it with clean backfill. The holding tank will be emptied regularly and its contaminated water hauled to a TCEQ approved facility for final disposal.

All contaminated rainwater and/or wash-water resulting from the operation of the transfer station will be disposed of in a manner that will not cause surface water or groundwater pollution.

SECTION 15

FACILITY OPERATING HOURS [30 TAC §330.229]

The facility is authorized to accept waste and operate during the time frames indicated in the following sections. In addition to the waste acceptance and operating hours, other non-waste management activities including administrative and maintenance activities may occur twenty-four hours a day, seven days a week.

15.1 WASTE ACCEPTANCE HOURS - Hill Country Waste Solutions, LLC. operates their waste collection service on a 24-hour basis. Therefore, the facility will be open continuously, accepting waste 24 hours a day - 7 days per week from Hill Country Waste Solutions LLC collections.

The facility will not be open to the public initially. However, it is anticipated that the facility will probably open to the public within two months of beginning operations. When that occurs, the facility will be open to the public from 8:00 AM - 4:30 PM, Monday through Friday, and from 8:00 AM - 11:00 AM on Saturdays.

In the unlikely event that the facility supervisor is required to leave the site unattended the gate must be locked in his or her absence.

15.2 OPERATING HOURS - Normal hours of operation will be the same as the waste acceptance hours noted above.

FACILITY SIGN [30 TAC §330.231]

A conspicuous sign measuring a minimum four feet by four feet is maintained at the public entrance to the facility. The sign states, in letters at least three inches high, the following information:

Spring Branch Transfer Station
Authorized by TCEQ Permit Number: (Still pending)

Hours of Operation: 24 hours per day/ 7 days per week

Hours Open to the Public: 8:00 AM - 4:30 PM; Monday through Friday; 8:00 AM - 11:00 AM Saturday

Emergency 24-hour Contact Number: 911
Local Emergency Fire Department Number: 911 or 830-885-7151 (Spring Branch Volunteer Fire Department - Central Station)

The sign is visible and readable from the facility entrance. Signs at the entrance will also state the wastes that are prohibited from receipt at the facility. Signs prohibiting smoking will be posted near the facility entrance. A sign will be prominently displayed at the facility entrance stating that all loads will be properly covered or otherwise secured.

SECTION 17

CONTROL OF WINDBLOWN MATERIAL AND LITTER [30 TAC §330.233]

The facility's operating area is enclosed by fencing. The facility supervisor will patrol the site and surrounding area at least once per day on days when the facility is in operation. The facility supervisor is responsible for cleaning the site and surrounding area of any windblown material and will do the following as needed:

- Collect litter or windblown material resulting from the operation and return it to the transfer building at least daily to minimize unsightly conditions and fire hazards.

- The site facility supervisor will inspect all roads to the site daily for windblown litter.

All trucks operated by Hill Country Waste Solutions LLC are covered. When private haulers are allowed access to the facility, a sign will be posted at the facility encouraging haulers to use enclosed vehicles to haul their loads, or to provided a tarpaulin, net, or other means to effectively secure the load in order to inhibit litter along roadways.

SECTION 18

MATERIAL ALONG THE ROUTE TO THE FACILITY [30 TAC §330.235]

In compliance with 30 TAC§330.235 (pertaining to Materials Along the Route to the Facility), the facility operator will take steps to encourage that vehicles hauling waste to the facility are enclosed or provided with a tarpaulin, net, or other means to effectively secure the load in order to prevent the escape of any part of the load by blowing or spilling. The operator will take actions such as posting signs, reporting offenders to proper law enforcement officers, adding surcharges, or similar measures. On days when the facility is in operation, the operator will be responsible for at least once per day cleanup of waste materials spilled along and within the right-of-way of public access roads serving the facility for a distance of two miles in either direction from any entrances used for the delivery of waste to the facility. The facility operator will consult with the Texas Department of Transportation concerning cleanup of public access roads and rights-of-way. An alternative clean-up frequency and distance may be approved by the executive director.

The Spring Branch Transfer Station will take the following steps to encourage that vehicles hauling waste to the facility effectively secure their loads in order to prevent the escape of any part of the load by blowing or spilling:

- A sign will be posted at the facility to encourage haulers to utilize vehicles that are enclosed or are provided with a tarpaulin, net, or other means to effectively secure the load.

- The facility supervisor will be responsible for daily cleanup of waste materials spilled along and within the right-of-way of the public access roads serving the facility for a distance of 2 miles in either direction from any entrances used for the delivery of waste to the facility.

FACILITY ACCESS ROADS [30 TAC §330.237]

The Spring Branch Transfer Station is located adjacent to Highway 281. An all-weather drive provides access to the transfer station from the highway and is briefly described below:

19.1 ALL-WEATHER ROADS - Vehicles will have access to the transfer station via all-weather concrete driveway. At no time will a vehicle be on an unimproved road. The interior transfer station road surfaces are constructed of flexible base (6" soil cement with 8" limestone base).

19.2 DUST CONTROL - Dust is not expected to be generated by the interior roadways. Similarly, Highway 281 is paved with asphalt and will not create a dust issue. As such, dust from on-site and other access driveway will not become a nuisance to surrounding areas.

However, in the unlikely event that dust ever becomes an issue at the facility, the operator will use whatever means necessary to control the dust on site. Water will be utilized to spray dusty areas to eliminate potential nuisances.

19.3 MAINTENANCE - Maintenance of Highway 281 will be performed by the Texas Department of Transportation (TxDOT). Regrading, repair, and maintenance of the internal roadway will be conducted by Hill Country Waste Solutions LLC on an as-needed basis to eliminate or minimize depressions, ruts, and potholes. Litter along these roadways will be picked up at least daily and taken to the collection area. The operator will consult with TxDOT regarding the clean up of spilled waste along roadways.

SECTION 20
NOISE POLLUTION AND VISUAL SCREENING [30 TAC §330.239]

The Spring Branch Transfer Station is located on a 23.80 acre tract located in Comal County, Texas. The proposed transfer station will only occupy a portion of the larger 23.80 acre site. The facility itself will be located on the southeastern portion of the tract adjacent to Highway 281 and will occupy approximately 9.52 acres of the site. Generally speaking, the site is bordered by Highway 281 to the east, by a commercial garden center to the north, and Jumbo Evans Sports Park to the west and south.

The nearest offsite residence is located approximately 1,100 feet southwest of the facility's southern boundary (on the opposite side of Jumbo Evan's Sports Park).

Access to the site will be controlled by a four wire fence around it to prevent the entry of livestock and to discourage unauthorized entry by the public. Some additional screening is provided by existing brush and trees which will be maintained during the operations of the facility.

Transfer activities will occur within a covered partially enclosed building equipped with walls on three sides to help mute noise. In addition, the entry to the transfer building faces the interior of the site and is equipped with roll-up doors that can be lowered to help mute noises within the building. Noise pollution should not be a problem.

SECTION 21

OVERLOADING AND BREAKDOWN [30 TAC §330.241]

The design capacity of the Spring Branch Transfer Station will not be exceeded during operation. Solid waste accumulated at the facility will be processed within such time as will preclude the creation of odors, insect breeding, or harborage of other vectors. If such accumulations occur, additional solid waste will not be received until the adverse conditions are abated.

In no event will solid waste be stored at the transfer station longer than 72 hours prior to transport off-site. Each walking floor trailer will be filled and dispatched to a TCEQ approved landfill as rapidly as possible.

The facility will restrict additional solid waste receipt if a significant work stoppage should occur due to a mechanical breakdown or other causes. Under such circumstances, incoming solid waste will be diverted to an approved backup storage, processing, or disposal facility. If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harborage of vectors, steps will be taken to remove the accumulated solid waste from the facility to an approved backup storage, processing, or disposal facility within 24 hours.

All working surfaces that come into contact with wastes will be swept daily.

The walking floor trailers at the facility will be situated on a curbed loading dock which provides access for unloading trucks. During normal operations, hose-down or scrubbing activities are not required for the trailers because they are washed off-site and come back clean. However, a water line and hose are provided at the site to facilitate wash-down in the event that such an action is ever required.

The pads, curbs, and retaining walls at the facility are constructed of materials which can be hosed down twice weekly. The facility supervisor will wash the concrete slabs at least twice per week and more often if odors or unsightly conditions prevail. In order to prevent the creation of odors or an attraction to vectors, wash water will not be allowed to accumulate on-site without proper treatment. The working floor and loading area of the transfer building is sloped in such a way as to direct wash water to the drains and thence to the above-ground holding tank. The holding tank will be emptied as-needed and its contents hauled to a TCEQ approved facility for final disposal.

In addition, no water will be allowed to pond on the site. If any rainwater ponds, the owner will be notified so that ponding can be eliminated.

Potable water will be supplied to the facility by water well or by the Canyon Lake Water Service Company. Both sources are capable of providing a sufficient supply of potable water to the facility.

Portable toilet facilities will be provided at several locations on-site for all employees and visitors. The wastewater generated from these restrooms will be removed on a regular basis and hauled to a TCEQ approved facility for final disposal.

SECTION 23
VENTILATION AND AIR POLLUTION CONTROL [30 TAC §330.245]

The facility will not cause or contribute to air pollution. As required by 30 TAC §330.245c, all solid waste and liquid waste is stored in odor-retaining containers and vessels. Walking floor trailers are loaded by the Hill Country Waste Solutions LLC's collection trucks which deposit solid waste at the facility. The trailers are filled, loaded onto transport trucks, and driven to the receiving landfill. When a trailer is filled, it will be covered and dispatched to the receiving landfill and a new trailer will then begin receiving waste. Please note that Hill Country Waste Solutions LLC does not collect wastes from commercial customers (such as restaurants) that consist solely of food waste. However, the waste collected from their residential and commercial customers is expected to have some food residue as an incidental component. Any solid waste containing large concentrations of food wastes or residue that is stored overnight will be mechanically separated from the incoming waste stream and stored in covered or closed odor-retaining containers or stored within tarped and sealed transfer trailers that are leakproof, durable, and designed for safe handling and easy cleaning. The containers will be stored within the transfer station building for no longer than 72 hours under normal conditions. There will be no designated storage area specifically set aside for containers with food waste, but the containers themselves can be marked to indicated their contents for easy identification by facility personnel if necessary. Similarly, any of the tarped and sealed transfer trailers that are not immediately dispatched to the landfill will be staged in the transfer trailer parking area for no longer than 72 hours under normal conditions. The odor-retaining containers will be maintained in a clean condition so that they do not constitute a nuisance and to retard the harborage, feeding, and propagation of vectors. The mechanically handled odor-retaining containers are designed to prevent spillage or leakage during storage, handling, and transport. All working surfaces at the project site will be cleaned and maintained regularly so as to prevent nuisance odors. Cleaning and maintenance of mobile waste processing unit equipment shall be performed each day of operation to reduce odors. Waste transfer activities will be conducted within the transfer building and all working floors (where putrescible waste will be handled) and the loading area containing the active transfer trailer will be enclosed within the transfer building and covered by the building's roof. The transfer building will be designed so as to be enclosed on the three sides by walls that are facing the property boundaries in order to preclude odors from migrating in the directions of adjacent properties. The entry ways to the building are located on the side of the transfer building facing into the interior of the project site to allow for ventilation of the building. The entry ways to the transfer building's working floor and ramped pit-area are also equipped with roll-up doors. The roll up doors may also be closed should operations be suspended due to nuisance odors; should such a situation arise, then all employees and public users will be evacuated from the building until the situation can be remedied. In addition, the entire site will be screened from the surrounding areas by a security fence and limited vegetation that will also serve to inhibit odors from leaving the site.

Any ponded water at the facility shall be controlled to avoid its becoming a nuisance. The working floor of the transfer building will be sloped so that wash water (or any other liquid) will be directed to drains which will collect wash water (or any other liquid) and direct it via drain line to a sump, thence it will be pumped to an above-ground contaminated water holding tank. The holding tank will be monitored daily to ensure their capacities are not exceeded and will be emptied on an as-needed basis and the contents hauled to a TCEQ approved facility for final disposal. The gravel surface will be sloped so as to direct runoff away from the transfer building. Similarly, the ground at the project site will be contoured so that stormwater runoff will be directed away from the transfer building. The entry driveway will be concrete paved and equipped with a crown to shed rainfall and prevent ponding there. In the event that ponding occurs on any of the lawn areas of the facility, those areas will be filled in and re-contoured so as to prevent standing water from occurring. In the event that objectionable odors do occur, appropriate measures shall be taken to alleviate the condition.

The design capacity of the Spring Branch Transfer Station will not be exceeded during operation. Solid waste accumulated at the facility will be processed within such time as will preclude the creation of odors, insect breeding, or harborage of other vectors. If such accumulations occur, additional solid waste will not be received until the adverse conditions are abated. In no event will solid waste be stored at the transfer station longer than 72 hours prior to transport off-site. At no time will the amount of stored waste exceed the ultimate capacity of the facility and it is anticipated that the facility will never exceed 900 tons of storage overnight.

If nuisance odors are found to be passing the facility boundary, the operator may suspend operations until the nuisance is abated or immediately take action to abate the nuisance. The facility will restrict additional solid waste receipt if a significant work stoppage should occur due to a mechanical breakdown or other causes. Under such circumstances, incoming solid waste will be diverted to an approved backup storage, processing, or disposal facility. If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harborage of vectors, steps will be taken to remove the accumulated solid waste from the facility to an approved backup storage, processing, or disposal facility within 24 hours.

A secondary procedure will be put in place should the transfer station become inoperable for more than 24 hours. This procedure will consist of the collection trucks hauling their collected solid waste directly to TCEQ landfills for final disposal. This procedure will remain in operation until the transfer station is returned to operation.

Reporting of emissions events shall be made in accordance with 30 TAC §101.201 (pertaining to Emissions Event Reporting and Record Keeping Requirements) and reporting of scheduled maintenance shall be made in accordance with 30 TAC §101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Record-keeping Requirements).

23.1 VENTILATION - The transfer station will include a covered building. The health and safety of the operator and the individuals unloading at the station are not expected to be adversely impacted due to lack of proper ventilation due to the fact that the building is partially enclosed with three walls and the front end of the building equipped with roll-up doors to allow for ventilation. Portable fans will also be provided at the facility which can be utilized on an as-needed basis to assist in ventilating the facility.

23.2 AIR POLLUTION 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 operator will prevent nuisance odors from leaving the boundary of the facility. If nuisance odors are found to be passing the facility boundary, the operator may suspend operations until the nuisance is abated or immediately take action to abate the nuisance.

The interior transfer station road surfaces will be of flexible base (6" soil cement with 8" limestone base). Dust should not pose a problem with this all-weather surface. However, in the unlikely event that dust does become a problem at the site, water and water hoses are available to dampen the problem areas to reduce dust.

23.3 AIR POLLUTION CONTROL DEVICES - If required in the future, this facility will obtain authorization for all constructed air pollutant devices under 30 TAC Chapter 116 (relating to Control of Air Pollution by Permits for New Construction or Modifications) or 30 TAC 330 Subchapter U (relating to Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations), as applicable, from the TCEQ Air Permits Division prior to the start of construction, except as authorized in Texas Health and Safety Code, §382.004 (pertaining to Construction While Permit Application Pending).

If air pollution control devices are required at some future date, they will be cleaned and maintained as per manufacturer's recommendations and as necessary so that the equipment efficiency can be adequately maintained in accordance with 30 TAC §330.245(e).

23.4 DISCUSSION OF COMPLIANCE WITH 30 TAC §330.245(f) - 30 TAC §330.245(f)(1) through (4) (pertaining to Ventilation and Air Pollution Control) states that "the owner or operator shall employ one or more of the following measures: (1) air scrubber units for odor control; (2) on-site buffer zones for odor control...; (3) additional waste handling procedures, storage procedures, and clean-up procedures for odor control when accepting putrescible waste; or (4) alternative ventilation and odor control measures". These are addressed in more detail below:

- Air Scrubber Units - No air scrubber units are proposed for the facility at this time.

- On-Site Buffer Zones - The 50 foot buffer zone around the transfer station building and the transfer trailer parking area is indicated on the proposed site layout plan; as shown therein, the distance from both structures to the facility boundary line is in excess of 50 feet. Specifically, there is a distance of approximately 170 feet from the transfer building to the southern property line (bordering Jumbo Evans Sports Park). Similarly, there is a distance of approximately 80 feet from the transfer trailer parking area to that same boundary. In effect, this extra distance will function as an additional on-site buffer zone to assist in odor control at the facility.

- Additional Waste Handling/Storage/Clean-up Procedures when Accepting Putrescible Waste - As noted above, if facility personnel visually identify incoming waste that contains a high percentage of food residue or food waste that will need to be stored overnight, then it will be either transferred from the working floor to a covered transfer trailer (and staged in the transfer trailer parking area) or to a covered odor-retaining container (and stored within the transfer station building). The filled trailers and containers will be stored at the facility for no longer than 72 hours under normal conditions.

- Alternative Ventilation and Odor Control Measures - Portable fans will also be provided at the facility which can be utilized to assist in ventilating the facility if needed.

Facility personnel will be trained in the appropriate sections of the facility's health and safety plan.

SECTION 25

EMPLOYEE SANITATION FACILITIES [30 TAC §330.249]

The facility will obtain potable water from a water well and/or the Canyon Lake Water Service Company's existing water distribution system. Sanitary hand-washing facilities are available for all employees. Portable toilet facilities are also furnished for employees at the site.

Vectors (such as rodents, flies, and mosquitoes) will be controlled through proper daily facility operations. If necessary, a licensed professional will apply pesticides for control of vectors to ensure that proper chemicals are used and that they are properly applied.

27.1 SALVAGING - No salvaging is scheduled to take place at the facility. However, the roll-off slots are for brush and metal recycling. Also, it is proposed that a C&D recycling facility is expected to be constructed at the facility at some future date.

27.2 SCAVENGING - Scavenging shall not be allowed.

The operator will provide visual screening of waste materials.