

1P159449
①

TCEQ Public Meeting Form

February 22, 2011

Micro Dirt, Inc. d.b.a. Texas Organic Recovery
Proposed Municipal Solid Waste Permit No. 2361

MSW
69059

PLEASE PRINT

Name: Edwin Benner

Mailing Address: 6020 Turnersville Rd, Creedmoor

Physical Address (if different): _____

City/State: Creedmoor, TX Zip: 78610

****This information is subject to public disclosure under the Texas Public Information Act****

Email: creedmoor cowboy@hotmail.com ✓

Phone Number: (512) 461-6499 cell 512 243 9161 home

• Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? Creedmoor Grocery

Please add me to the mailing list. ✓

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

CHIEF CLERKS OFFICE
2011 FEB 24 AM 10:53
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Please give this form to the person at the information table. Thank you.

EW

OFFICE RECEIVED

FEB 22 2011

AT PUBLIC MEETING

Edwin E. Benner
6020 Burnersville Rd.
Creedmoor, Tx 78610
512 461-6499
February 22, 2011

Dear People,

This is the second Public Hearing on Microdirt that I have attended. At the first meeting, Microdirt was applying for a permit to process grease trap waste.

Some of Microdirt's neighbors complained of the odor that comes from Microdirt. A woman talked about the environmental impact of Microdirt treating sewage sludge.

I have thought about the location of Microdirt. It would be hard for Microdirt to be much further south or east and still be in Travis County. There are very few neighbors within 1/2 a mile, and maybe 10 or so within a mile of Microdirt. The dirt is a heavy black clay, with a subsoil of yellow clay. As far as I know, there are no aquifers under Microdirt.

Microdirt turns a potential pollutant, sewage sludge, into harmless fertilizer. This is a good thing for the soil.

Sincerely yours,
Edwin E. Benner

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
FEB 24 10 53 AM
CHIEF CLERK'S OFFICE

FIVE STAR
FIVE STAR
FIVE STAR
FIVE STAR
FIVE STAR

EW

page 2

Edwin E. Benner
6020 Turnersville Rd.
Creedmoor, TX 78610
512 461-6499
February 22, 2011

Dear People,

I have talked to the owner of Micro dirt since the first Public Meeting. Apparently, one reason that Micro dirt is having a second public hearing is that Micro dirt's competitor wants to put them out of business. Then the competitor can charge a large price for its recycled sewage.

This might make its product too expensive for your ordinary gardener.

Micro dirt apparently charges less to recycle sewage sludge, so businesses are willing to truck their wastes a little farther out to Micro dirt.

Micro dirt then composts the sewage sludge with straw, brush and turns it into a harmless fertilizer. They sell this fertilizer more cheaply than their competitor.

By composting the sewage sludge with wood chips, Micro dirt turns a pollutant into a harmless fertilizer. This is good for the environment.

Sincerely yours,
Edwin E. Benner

TEXAS
COMMISSION ON
ENVIRONMENTAL
QUALITY
FEB 24 AM 10:53
CHIEF CLERK'S OFFICE

FIVE STAR
FIVE STAR
FIVE STAR
FIVE STAR
FIVE STAR
FIVE STAR
FIVE STAR

TCEQ Public Meeting Form

September 2, 2010

Micro Dirt, Inc. dba Texas Organic Recovery Proposed MSW Registration No. 43024 and Permit No. 2361

PLEASE PRINT

Name: Edwin E. Benner

Mailing Address: 6020 Turnersville Rd

Physical Address (if different): _____

City/State: Creedmoor, TX Zip: 78610

****This information is subject to public disclosure under the Texas Public Information Act****

Email: creedmoorcowboy@hotmail.com ✓

Phone Number: (512) 461 6499

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list for Registration 43024.

Please add me to the mailing list for Permit 2361.

I wish to provide formal *ORAL COMMENTS* for Registration 43024. ✓ (2)

I wish to provide formal *ORAL COMMENTS* for Permit 2361. did not speak

I wish to provide formal *WRITTEN COMMENTS* for Registration 43024.

I wish to provide formal *WRITTEN COMMENTS* for Permit 2361.

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
SEP -9 PM 3:22
CHIEF CLERKS OFFICE

Please give this form to the person at the information table. Thank you.

Microdirt Composting

Registration 43024

Permit 2361

OPA RECEIVED

AUG 02 2010

Dear ladies and gentlemen,

I have come here tonight to support composting of human waste with brush. Microdirt does it at a place far away from most people. Some people, like the Kunzes can smell it from almost a mile away. Most people in Travis County can't. Microdirt is almost as far south as you can get in Travis County.

AT PUBLIC MEETING

People talk about global warming, and protecting the environment. Then other people, like the City of Creedmoor push down every tree in the city park. 100 year old mesquite trees die and will rot, adding CO₂ to the air.

TEXAS
COMMISSIONER
OF ENVIRONMENT
AND NATURAL
RESOURCES
OFFICE
1000
PH 512
281

Microdirt is composting carbon. They are enriching the soil so it will grow more plants. They are using something that would otherwise pollute the rivers and the ocean.

Chris

DAVIDSON 60

NRCC

The Texas Natural Resources Commission regulates septic tanks. They may have to hire a new man to inspect Microdirt. This would cause them to have to ask for more money from the state. On the other, the city of Austin makes Dilho dirt from the same stuff Microdirt uses. NRCC does not shut the city down. Why should they shut Microdirt down? Do they not want the middle class to make money? Rich people like the city of Austin make money. Why can't ordinary people do it?

Thank you and

Goodnight.

Edwin E. Benner
9/2/2010

TCEQ Public Meeting Form

September 2, 2010

Micro Dirt, Inc. dba Texas Organic Recovery Proposed MSW Registration No. 43024 and Permit No. 2361

PLEASE PRINT

Name: JOE and Dorothy GUNN

Mailing Address: 6506 Williamson Rd

Physical Address (if different): _____

City/State: Creedmoor Zip: 78618

****This information is subject to public disclosure under the Texas Public Information Act****

Email: _____

Phone Number: (512) 243 6222

- Are you here today representing a municipality, legislator, agency, or group? Yes No
If yes, which one? _____

Please add me to the mailing list for Registration 43024.

Please add me to the mailing list for Permit 2361.

I wish to provide formal *ORAL COMMENTS* for Registration 43024. (4)

I wish to provide formal *ORAL COMMENTS* for Permit 2361. (3)

I wish to provide formal *WRITTEN COMMENTS* for Registration 43024. *did not submit*

I wish to provide formal *WRITTEN COMMENTS* for Permit 2361. *did not submit*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
SEP - 9 PM 3: 22
CHIEF CLERKS OFFICE
Joe Gunn

Please give this form to the person at the information table. Thank you.

34

1 P1 60429
3

TCEQ Public Meeting Form

February 22, 2011

Micro Dirt, Inc. d.b.a. Texas Organic Recovery Proposed Municipal Solid Waste Permit No. 2361

PLEASE PRINT

Name: Carter Mayfield

Mailing Address: PO Box 201480

Physical Address (if different): 1375 Creekview Dr.

City/State: San Antonio, TX Zip: 78220-8480

****This information is subject to public disclosure under the Texas Public Information Act****

Email: Carter.Mayfield.wg83@wharton.upenn.edu ✓

Phone Number: (210) 422-4249

• Are you here today representing a municipality, legislator, agency, or group? Yes No
If yes, which one? _____

Please add me to the mailing list. ✓

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.
(Written comments may be submitted at any time during the meeting)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2011 FEB 24 AM 10:53
CHIEF CLERKS OFFICE

Please give this form to the person at the information table. Thank you.

CM

5

TCEQ Public Meeting Form

February 22, 2011

Micro Dirt, Inc. d.b.a. Texas Organic Recovery Proposed Municipal Solid Waste Permit No. 2361

PLEASE PRINT

Name: Phillip McLammon II

Mailing Address: 14928^{FM} RR 620 N

Physical Address (if different): _____

City/State: TX Aust Zip: 78717

****This information is subject to public disclosure under the Texas Public Information Act****

Email: _____

Phone Number: () _____

• Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

CHIEF CLERKS OFFICE
2011 FEB 24 AM 10:53
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Please give this form to the person at the information table. Thank you.

CM

IP 12393
4

TCEQ Public Meeting Form

February 22, 2011

Micro Dirt, Inc. d.b.a. Texas Organic Recovery Proposed Municipal Solid Waste Permit No. 2361

PLEASE PRINT

Name: Robin Schneider

Mailing Address: 611 S. Congress Ave #200

Physical Address (if different): _____

City/State: Austin Zip: 78704

****This information is subject to public disclosure under the Texas Public Information Act****

Email: robin@texasenvironment.org ✓

Phone Number: (512) 326 5655

- Are you here today representing a municipality, legislator, agency, or group? Yes No
If yes, which one? Tx Campaign for the Environment

Please add me to the mailing list. ✓

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.
(Written comments may be submitted at any time during the meeting)

CHIEF CLERKS OFFICE
2011 FEB 24 AM 10:53
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Please give this form to the person at the information table. Thank you.

MW

TCEQ Public Meeting Form

September 2, 2010

Micro Dirt, Inc. dba Texas Organic Recovery Proposed MSW Registration No. 43024 and Permit No. 2361

PLEASE PRINT

Name: Robin Schneider

Mailing Address: 611 S. Congress Ave #200

Physical Address (if different): _____

City/State: Austin Zip: 78704

****This information is subject to public disclosure under the Texas Public Information Act****

Email: robin@texasenvironment.org ✓

Phone Number: (512) 326 5655

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? Texas Campaign for the Envir.

Please add me to the mailing list for Registration 43024.

Please add me to the mailing list for Permit 2361.

I wish to provide formal *ORAL COMMENTS* for Registration 43024.

I wish to provide formal *ORAL COMMENTS* for Permit 2361.

I wish to provide formal *WRITTEN COMMENTS* for Registration 43024.

I wish to provide formal *WRITTEN COMMENTS* for Permit 2361.

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
2010 SEP -9 PM 3:22
CHIEF CLERKS OFFICE

(3)
(2)

Please give this form to the person at the information table. Thank you.

Robin

From: PUBCOMMENT-OPA
To: PUBCOMMENT-OCC2
Date: 9/3/2010 10:27 AM
Subject: Fwd: Public comment on Permit Number 2361
Place: PUBCOMMENT-OCC2
Attachments: Travis County Comments 9-2-101.pdf

>>> PUBCOMMENT-OCC 9/2/2010 4:24 PM >>>

>>> <jon.white@co.travis.tx.us> 9/2/2010 4:21 PM >>>

REGULATED ENTITY NAME:TEXAS ORGANIC RECOVERY
RN NUMBER:RN101287548
PERMIT NUMBER:2361
DOCKET NUMBER:
COUNTY:TRAVIS
PRINCIPAL NAME:MICRO DIRT INC
CN NUMBER:CN602441610
FROM
NAME:Jon White
E-MAIL:jon.white@co.travis.tx.us
COMPANY:Travis County
ADDRESS:PO BOX 1748
AUSTIN TX 78767-1748
PHONE:5128547212
FAX:
COMMENTS:See attached

*MSW
69059*

MSW

TRANSPORTATION AND NATURAL RESOURCES

JOSEPH P. GIESELMAN, EXECUTIVE MANAGER

NATURAL RESOURCES & ENVIRONMENTAL QUALITY DIVISION



411 West 13th Street
Executive Office Building
PO Box 1748
Austin, Texas 78767
(512) 854-9383
FAX (512) 854-4697

2 September 2010

Office of the Chief Clerk (MC 105)
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

Re: Micro Dirt, Inc. d.b.a. Texas Organic Recovery
Registration Application #43024 New MSW Grease Trap Waste Processing Facility
(Type V)
Permit Application #2361 MSW Grease Trap Waste Processing and Composting Facility

Sir or Madame:

Travis County is in receipt of a public notice dated August 9, 2010, inviting public comment on the above-referenced applications. In response, our department would appreciate your consideration of the following comments.

1. We note that Registration Application #43024 was originally for a Type VI demonstration facility i.e. using new or unproven methods for managing MSW. It is unclear to us how the original proposal could have been construed as a new or unproven method, but it is equally unclear how the proposal has evolved to make this a Type V waste process. We see no difference other than the volume of waste to be accepted.
2. Travis County commented previously on the need for enclosing waste processing areas. Specifically TCEQ operational standards for municipal solid waste storage and processing units (30 TAC §330.245(g)) state that "Process areas that recover material from solid waste that contains putrescibles shall be maintained totally within an enclosed building. Openings to the process area shall be controlled to prevent releases of nuisance odors from leaving the property of the facility."

A heater vessel is proposed as part of the process area to process and further separate grease trap waste streams. However, the heater vessel is not proposed to be maintained within an enclosed building. Enclosure and control of emissions from grease trap processing is required. Travis County believes the applicant's proposal will result in

uncontrolled, putrid odors with the potential to migrate off-site with deleterious impacts on nearby residents and the normal enjoyment of property.

The TCEQ response to this comment was that the heating vessel is "...an enclosed tank and therefore, does not expose waste to the atmosphere." We maintain that this interpretation is inconsistent with the plain language in 30 TAC §330.245 which clearly differentiates between containers and vessels as opposed to an enclosed building.

We urge reconsideration of this issue especially in light of the past odor issues at the Micro Dirt facility and the ongoing lack of good site management practices (see additional comments below).

3. Travis County also commented previously on the lack of adequate management of the site in terms of vegetative cover and stabilization of slopes on the existing impoundment to contain runoff. In particular, TCEQ requirements under 30 TAC §330.205(c) and §330.207 specify that the operator of a processing facility must manage and dispose of liquids generated in a manner that will not cause surface water pollution. The applicant proposes to route excess wastewater to its windrow composting operation with contaminated liquid runoff from windrows to flow into a surface impoundment on-site.

Travis County inspected the surface impoundment at the Micro Dirt site in association with our review of this application. The impoundment side slopes had noticeable rills. Berms and side slopes of the impoundment lacked vegetative cover and stabilization to reduce erosion and sediment pollution that would flow into water in the state. Without stabilization, the integrity of the impoundment will eventually be compromised. The permit and registration should include provisions that require the stabilization and continued maintenance of a vegetative cover on the surface impoundment. Proper contaminated water management includes maintenance of all facilities at the site and is integral to compliance under both the registration and the permit.

The TCEQ response to this comment was that the impoundment is considered a waste management unit and there is no requirement for such surface impoundments to have a vegetative cover. However it is our position that the deficiencies in ongoing management of the impoundment and disturbed lands throughout the working area reflect basic, inadequate management practices that will contribute to inadequate functioning of the impoundment and the potential discharge of sediment in stormwater runoff. The site should be stabilized by whatever best management practices prove necessary on the site. In addition, we request an opportunity to review a Storm Water Pollution Protection Plan for this site prepared in accordance with requirements of the Texas Water Code and the federal Clean Water Act.

4. The site operating plan for this facility does not provide adequate procedures for waste acceptance and analysis. The inadequate procedures create a high likelihood for nuisance odor conditions. The past performance of this facility, especially with respect to nuisance odors, also suggests a high likelihood of future odor issues. The application provides no information with respect to how sources of waste will be screened, how an effective

inspection of loads will be conducted upon entry, what specific training the staff will have and how odor issues will be addressed. Methods relying completely on visual waste analysis by the operator may have been satisfactory for a demonstration facility but are not adequate for a fully operational facility being considered for authorization of a greater magnitude.

5. The proposal does not provide for adequate controls or response to nuisance odors. This concern arises from:
 - a. Failure to provide for enclosed waste processing areas as detailed in item 2 above;
 - b. Inadequate controls over waste acceptance and inspection as described in item 4 above;
 - c. Past history of serious odor issues on this site; and
 - d. General concerns over inadequate operations as exemplified by the ongoing failure to maintain the site using best management practices.

Travis County appreciates you providing a meaningful opportunity to participate in this authorization process and the opportunity to provide these comments. If you have any questions, you may contact me at (512) 854-7212 or Thomas Weber of my staff at 854-4629.

Sincerely,



Jon A. White, Director
Natural Resources and Environmental Quality Division
Transportation and Natural Resources Department

JAW

cc: T. Weber