

Ellie Guerra

From: PUBCOMMENT-OCC
Sent: Wednesday, December 21, 2022 9:24 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 1586B
Attachments: 221220 withdraw greenbelt comments to TCEQ .pdf

WC

From: elita.castleberry@pcs.hctx.net <elita.castleberry@pcs.hctx.net>
Sent: Tuesday, December 20, 2022 4:54 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 1586B

REGULATED ENTY NAME GREENBELT LANDFILL

RN NUMBER: RN101287852

PERMIT NUMBER: 1586B

DOCKET NUMBER:

COUNTY: HARRIS

PRINCIPAL NAME: WASTE CORPORATION OF TEXAS LP

CN NUMBER: CN602528804

FROM

NAME: Elita Bartley Castleberry

EMAIL: elita.castleberry@pcs.hctx.net

COMPANY: Harris County Pollution Control Services

ADDRESS: 101 RICHEY ST Suite H
PASADENA TX 77506-1020

PHONE: 7132746236

FAX: 7132746475

COMMENTS: Harris County Pollution Control Services respectfully submits the withdrawal letter as a pdf.

Harris County Pollution Control

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Harris County Pollution Control Services

Dr. Latrice Babin, Executive Director



December 20, 2022

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC 105
PO Box 13087
Austin, TX 78711-3087

Re: Withdrawal of Comments on Waste Corporation of Texas, L.P. for Permit Amendment
Application 1586B in Harris County, TX

Dear Ms. Gharis,

Harris County Pollution Control Services (PCS) hereby withdraws all July 1, 2022, comments related to the above-referenced application and have no further objections to the issuance of the Permit. The applicant has addressed our concerns.

Sincerely,

Dr. Latrice Babin
Executive Director

cc: Helen Bonnyman - Harris County Judge's Office
Sarah Utley - Harris County Attorney's Office
Kristen Lee - Harris County Precinct 2
Nicole Bealle - TCEQ Region 12
Marcos Elizondo - GFL
Steve Howard - GFL
JRoy Murray - SCS Engineers

MSW
126339

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Tuesday, July 5, 2022 1:47 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 1586B
Attachments: 220531 Greenbelt comment letter 1586B_.pdf

From: elita.castleberry@pcs.hctx.net <elita.castleberry@pcs.hctx.net>
Sent: Friday, July 1, 2022 9:45 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 1586B

REGULATED ENTY NAME GREENBELT LANDFILL

RN NUMBER: RN101287852

PERMIT NUMBER: 1586B

DOCKET NUMBER:

COUNTY: HARRIS

PRINCIPAL NAME: WASTE CORPORATION OF TEXAS LP

CN NUMBER: CN602528804

FROM

NAME: Elita Bartley Castleberry

EMAIL: elita.castleberry@pcs.hctx.net

COMPANY: Harris County Pollution Control Services

ADDRESS: 101 RICHEY ST Suite H
PASADENA TX 77506-1020

PHONE: 7132746236

FAX: 7132746475

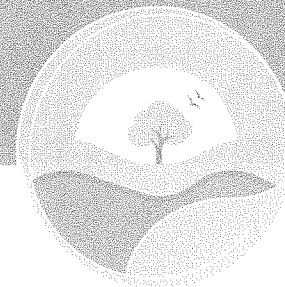
COMMENTS: Harris County Pollution Control Services respectfully submits the comment letter as a pdf.

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Dr. Latrice Babin, Executive Director



July 1, 2022

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC 105
PO Box 13087
Austin, TX 78711-3087

Re: Comments on Waste Corporation of Texas, L.P. for Permit Amendment Application
1586B in Harris County, TX

Dear Ms. Gharis,

Harris County Pollution Control Services (PCS) respectfully submits the following comments on the Waste Corporation of Texas, L.P. for the Greenbelt Landfill (Greenbelt) application referenced above. The application is requesting a major amendment to an existing Type IV municipal solid waste (MSW) disposal facility for authorization of a lateral and vertical expansion.

PCS inspects facilities in Harris County for compliance with solid waste laws and regulations, reviews permit applications, and submits comments to the Texas Commission on Environmental Quality (TCEQ) on permitting actions. PCS also works closely with the TCEQ's Houston Region 12 office, which refers a substantial portion of environmental complaints, including nuisance complaints, from Harris County citizens to PCS. PCS then investigates these complaints and, when appropriate, issues Violation Notices and refers cases to the Harris County Attorney's Office or District Attorney's Office for civil or criminal enforcement.

Greenbelt is located at 550 Genoa-Red Bluff Road, Houston, Texas 77034. PCS has conducted a review of the application and submits the following comments and recommendations for your consideration.

Transportation and Airport Safety

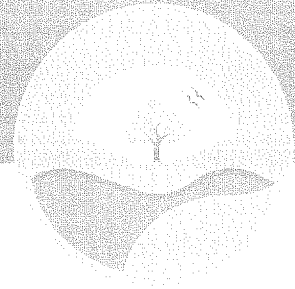
Greenbelt is located within 7,500 feet of a runway used by turbojet aircraft and, based on the application, needs to demonstrate how to operate so not to pose a bird hazard to aircraft. According to the application, Ellington Airfield is within 1 mile southeast, and Hobby Airport is 5.5 miles northwest of the Facility. According to the application, because Greenbelt doesn't accept putrescibles, bird hazards are not expected.

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A letter dated April 7, 2022, from the United States Department of Transportation Federal Aviation Administration (FAA), had no objection to the lateral or vertical expansion of the Facility based on the FAA guidance for hazardous wildlife attractants on or near airports.

Houston Spaceport

The Houston Spaceport is an FAA licensed urban commercial spaceport co-located at Ellington Airfield. Houston Spaceport offers a launch and landing site for suborbital, reusable launch vehicles. On May 11, 2022, Axiom Space, the future of low-Earth orbit and human spaceflight, broke ground at a new headquarters at Ellington Airfield.

Compost/Mulching Facility

The Facility has proposed an area designated for a compost/mulching facility. The compost feedstocks include brush, clean wood material, yard trimmings, manure, meat feedstocks, fish feedstocks, dead animal carcass, vegetative material, oils and greases, dairy material feedstocks, paper, and other notification feedstocks.

PCS Recommendations

PCS is concerned with the proximity of Greenbelt to the Ellington Airfield, especially with increased activity from the Houston Spaceport.

Due to increased waste disposal activity and from potential composting and mulching activities which may accept putrescibles, PCS recommends Greenbelt include a plan to prevent birds from congregating at the landfill.

Existing Conditions Summary

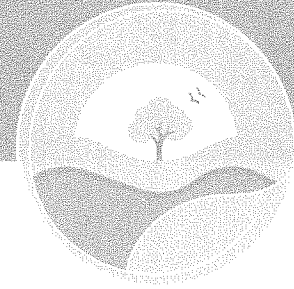
Approximately 3,935 single-family homes are within a one mile radius, with the nearest resident 30 feet from the northern boundary on Old Genoa Red Bluff Road. A church is approximately 700 feet from the landfill and a licensed day care is approximately 1,200 feet away, both west of Greenbelt. In addition, 8 schools are within one mile of Greenbelt.

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Per 30 TAC 330.5(a)(2) MSW facility - Type IV. A Type IV landfill unit may only accept brush, construction, or demolition waste and/or rubbish. A Type IV landfill unit may not accept putrescible wastes, conditionally exempt small quantity generator waste, or household wastes.

PCS Recommendations

PCS is concerned the community and residents will object to the vertical expansion of the landfill in the area, especially with the nearest resident being 30 feet away.

PCS recommends the permit have in place plans to address nuisance complaints about odors and vermin, which may result from the breakdown of drywall, wood, or other waste. PCS also recommends the addition of an odor control system that can be utilized to mitigate any odors which may emanate from the site.

PCS is also concerned the Facility is applying as a Type IV landfill which does not allow for putrescible waste but is also requesting for the ability to compost using feedstock material such as manure, meat, fish, dead animal carcass, vegetative material, dairy, etc. which are considered putrescible wastes.

PCS recommends the permit not allow for any putrescible waste per 30 TAC §330.5(a)(2) to be brought onsite for composting or other purposes which could potentially be disposed of, inadvertently contaminating, in the Type IV landfill.

Should composting using putrescible waste be authorized, PCS recommends the facility have a detailed procedure for the receipt and handling of putrescibles for composting purposes to ensure none are inadvertently disposed of in the landfill.

Tire Staging Area

The Facility will accept for disposal split and quartered or shredded tires.

Compost/Mulching Facility

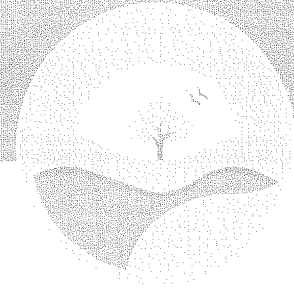
The Facility may have an area designated for a compost/mulching facility. Compost feedstocks and brush may be stored at the compost/mulching facility for on-site compost/mulching.

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Compost Plan

Greenbelt may operate a composting facility with hours of operation set at the discretion of site management.

2007 Volume I and II: Regional Solid Waste Management Plan

The TCEQ requires all MSW facilities proposed for siting in the Houston-Galveston Area Council (H-GAC) region must conform to the Regional Solid Waste Management Plan (SWMP), as stipulated in the Texas Health and Safety Code §363.066 and the TCEQ rules 30 TAC §330.566. Per the currently in effect 2007 SWMP, the first regional goal is to provide services and technical assistance support for local and regional solid waste management planning, the second regional goal is to promote the planning for adequate MSW disposal, handling, and management facilities, and the third regional goal is to promote the options for reduction and recycling of waste disposal in MSW management facilities. Subchapter E of the TCEQ's permitting procedures 30 TAC §330.51(10) states that it is the responsibility of the applicant to demonstrate conformance with the regional SWMP.

PCS Recommendations

PCS is concerned the Facility replaced active verbs with weaker discretionary forms such as "may operate" and "may have" which does not indicate a definitive action regarding the compost/mulching facility or recycling operations.

PCS also recommends a definitive plan with active non-discretionary verbs be used to conform to the SWMP goals and to encourage recycling. PCS recommends Greenbelt send all recyclables such as brush and yard waste to the onsite or a local mulch facility. Scrap tires (split, quartered or shredded), and other recyclable materials are recommended to be disposed of at recycling facilities to extend the life of the Facility and promote conservation through reuse per Texas Health and Safety Code §363.066, 30 TAC §330.566 and the H-GAC SWMP.

PCS noted there already exists an operational mulch facility in close proximity to the landfill, which could potentially receive the brush and yard waste.

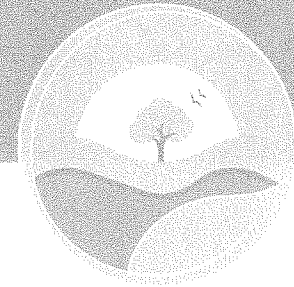
PCS recommends Greenbelt explore that option should the proposed mulching operation not materialize.

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Groundwater Characterization and Monitoring Report Pollutant Pathway

Groundwater flows in a southeast direction towards the Gulf of Mexico and Galveston Bay. The existing groundwater monitoring system consists of four upgradient groundwater monitoring well and three downgradient groundwater monitoring wells for a total of 7. Groundwater at the Facility has been sampled and analyzed since 1984.

PCS Recommendations

PCS is concerned there are 33 water wells within 500 feet and more within a 1 mile radius of the Facility that may become or are contaminated by the Facility. PCS is also concerned there are only 7 groundwater monitoring wells.

PCS recommends Greenbelt provide a description of mitigation measures which will be taken if contaminants of concern are measured above MCL in monitoring wells. PCS also recommends additional groundwater monitoring wells be required to ensure the groundwater and drinking water are protected.

Groundwater Sampling and Analysis Plan

Electronic data of groundwater sampling and analysis results will be submitted to the TCEQ on format as specified by the TCEQ.

PCS Recommendation

PCS requests to be provided a copy of the submittal of groundwater sampling and analysis results.

Site Operating Plan

The SOP notes the landfill manager is responsible for determining the random inspection schedule, but a minimum of one inspection per week will be conducted.

PCS Recommendation

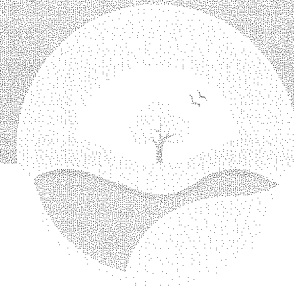
PCS recommends the TCEQ require the applicant to amend the permit application to include a provision requiring random inspections be performed daily for more than 10% of the incoming loads to ensure prohibited wastes do not enter the landfill and maintain a log of all inspections.

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Site Operating Plan

Recordkeeping training for maintaining the site operating record (Section 1.2 of the Site Operating Plan) will be performed at a frequency as needed for the Gate Attendant. Per section 1.2 the following information will be recorded and retained within seven working days of completion or receipt of any relevant analytical data: location restriction demonstrations; inspection records, training procedures, and notification procedures relating to excluding the receipt of prohibited waste; results from gas monitoring and any remediation plans relating to explosive and other gases, including notices and reports regarding the detection of explosive and other gases above regulatory limits in accordance with the landfill gas contingency plan; demonstration, certification, findings, monitoring, testing, and analytical data relating to groundwater monitoring and corrective action; closure and post-closure care plans, and any monitoring, testing, or analytical data relating to post-closure requirements; cost estimates and financial assurance documentation relating to final closure and post-closure care; copies of all correspondence and responses relating to the operation of the Facility, including written notifications made to the TCEQ, modifications or amendments to the permit, approvals, and other matters pertaining to technical assistance; training records; personnel operator licenses; annual and quarterly solid waste summary reports; and any other document(s) as specified by the approved permit or by the TCEQ.

Cover Application Log and Inspection Record

Throughout the landfill operation, a cover application log is maintained and is readily available for inspection in accordance with 30 TAC §330.165(h). For intermediate cover and weekly cover, the log specifies the area covered (by use of the grid system), how it was placed, and when it was completed. For final cover, the log shows the final cover area, reports the date the final cover was applied, reports the thickness of the final cover applied on that date, and references the final cover certification report for each area. Each entry is certified by the signature of the landfill manager that the work was accomplished as stated in the log.

PCS Recommendation

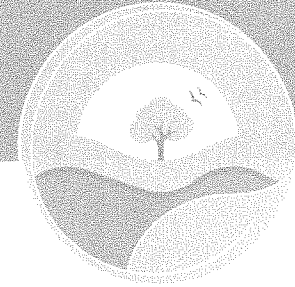
PCS conducts inspections at facilities and often has noted recordkeeping to be inadequate resulting in violations. PCS is concerned because the Cover Application Log was not specified in the recordkeeping section 1.2 of the Site Operating plan. Additionally, the Cover Application Log is required to be signed by the landfill manager, who should also receive recordkeeping training.

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PCS recommends the landfill manager, office clerk, and gate attendant be required to receive annual recordkeeping training. PCS also recommends the Section 1.2 of the Site Operating plan be updated to include Cover Application Log.

Alternative Weekly Cover Operating Plan

The alternative weekly cover (AWC) material proposed in this plan was approved for permanent use as an alternative weekly soil cover. The proposed AWC material will consist of a mixture of drywall and soil. Drywall, also called gypsum drywall or wallboard, is typically made of gypsum plaster pressed between two thick sheets of paper. The landfill manager or designated alternate will document where weekly cover has been placed and will visually inspect the areas during placement to ensure that a minimum of 6 inches of the AWC has been placed and that no waste is exposed. On a weekly basis, the landfill manager or designated alternate will document the AWC placement area and maintain the cover inspection record in the site operating record. In accordance with §330.165(d)(3), alternative daily cover must not be allowed when the landfill is closed for a period greater than 24 hours, unless the TCEQ approves a longer period. It is requested that the maximum period of 24 hours for AWC be extended to a period of one week.

Per **30 TAC 330.165(h)** Cover inspection record. Each landfill must keep a cover application record on site readily available for inspection by commission representatives and authorized agents or employees of local governments having jurisdiction. This record must specify the date cover (no exposed waste) was accomplished, how it was accomplished, and the last area covered. This applies to daily, intermediate, and alternative daily cover. For final cover, this record must specify the area covered, the date cover was applied, and the thickness applied that date. Each entry must be certified by the signature of the on-site supervisor that the work was accomplished as stated in the record. The cover inspection record must document inspections required under subsection (g) of this section, the findings, and corrective action is taken when necessary.

Per **30 TAC 330.165(d)(3)** Alternative daily cover must not be allowed when the landfill is closed for a period greater than 24 hours unless the executive director approves an alternative length of time.

PCS Recommendation

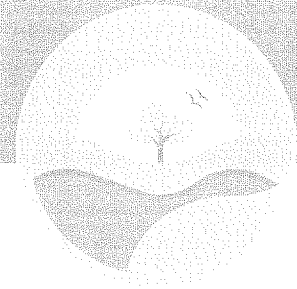
Application of AWC should be logged in the Cover Application Log but was not specified in the AWC Operating Plan.

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PCS recommends the TCEQ require the applicant to update the application, specifically noting in the AWC Operating Plan to include the Cover Application Log along with the same process specified per the Cover Application Log section of "For intermediate cover and weekly cover, the log specifies the area covered (by use of the grid system), how it was placed, and when it was completed" per 30 TAC §330.165(h). Additionally, per 330.165(d)(3) PCS requests specifics on the length of time AWC was/is authorized.

General Geology and Soil Statement and Regional Physiography and Topography

In the above sections, the area rainfall was cited as 49.77 inches from 1981 to 2010, according to NOAA. In Appendix D, Evaluation of Current Site Hydrological Conditions, PCS calculated the average rainfall from 2010 to 2019 as 52.2 inches based on the data provided with a range from 25 to 71 inches of cumulative annual rainfall during the more recent time span.

PCS Recommendation

PCS is concerned that given recent changes in weather conditions, the rainfall amount provided for 1981 to 2010 was lower at 49.77 inches than the more recent value of 52.2 inches. Therefore PCS recommends the TCEQ require the applicant to utilize more current rainfall data in any calculations since the information was provided in Appendix D.

Landfill Gas Management Plan

There is a low probability of gas migration therefore there will be quarterly monitoring of methane gas with adequate maximum spacing between permanent gas probes. A total of 12 gas monitoring probes have been installed around the existing Facility at a lateral spacing of approximately 1,000 feet. The following will be plugged and abandoned GP-05, GP-06, GP-07, and GP-08. GP-6A, GP-7 A, and GP-8A will replace the plugged and abandoned gas probes. Three additional gas monitoring

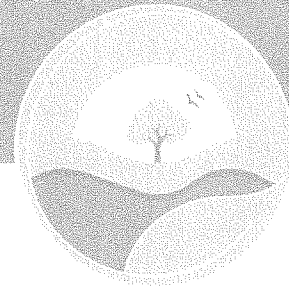
probes (GP-13, GP-14, and GP-15) are proposed. A total of 14 probes will be in place and working. If any damage to the monitoring probe is observed, the damage will be noted on the form, and the monitoring probe will be repaired. If the probe is irreparable, following approval of the TCEQ, it will be decommissioned and replaced with a new gas monitoring probe.

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PCS Recommendation

PCS is concerned that the amount of waste is proposed to increase from 12,859,908 cubic yards to 18,706,057 cubic yards. This includes 1,737,000 cubic yards of the in-place waste for the Type I area which was closed in 1993. The total site volume with the expansion is calculated at 19,921,211 cubic yards. The number of gas monitoring probes is going from the 12 which are present to 14 after plugging and replacing GP-06, GP-07, and GP-08. PCS is concerned the proposed Landfill Gas Management Plan does not adequately address the gas monitoring needs of the proposed expansion. PCS recommends the TCEQ assess the need for additional gas monitoring probes due to the proposed increase in volume.

PCS appreciates the opportunity to submit these comments for your consideration. Should you or other TCEQ staff have questions, contact Elita Castleberry at (713) 274-6236 or by email at elita.castleberry@pcs.hctx.net.

Sincerely,

Andrew Brady For

Dr. Latrice Babin
Executive Director

cc: Helen Bonnyman - Harris County Judge's Office
Sarah Utley - Harris County Attorney's Office
Kristen Lee - Harris County Precinct 2
Nicole Bealle - TCEQ Region 12