

**TCEQ DOCKET NO. 2024-1407-MSW**

**APPLICATION BY  
SOUTHWASTE DISPOSAL, LLC  
FOR LIMITED-SCOPE MSW PERMIT  
AMENDMENT NO. 2317**

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**BEFORE THE  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**

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**EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS  
AND REQUESTS FOR RECONSIDERATION**

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The Executive Director of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Hearing Requests and Requests for Reconsideration (Response) on the limited-scope amendment application (LSA Application) by SouthWaste Disposal, LLC (SouthWaste Disposal or Applicant) for a composting facility, Municipal Solid Waste (MSW) Permit Number 2317. The LSA Application would change the hours of operation, equipment used, energy and mass balance calculations, closure and post-closure care plan, and increase the amount of feedstocks received at the composting site.

The Office of the Chief Clerk (OCC) received timely hearing requests from: Vincent Arreguin, Kathryn Avila, Ashley Perez, and Rolando Ramirez.

The Executive Director recommends that the Commission find the following requestors are affected persons and grant their hearing requests:

Vincent Arreguin and Kathryn Avila.

Attached for the Commission's consideration are two Geographic Information Systems (GIS) maps of requestors in the area of the facility (Attachment A), along with a list of landowners within 1/2 mile of the facility (Attachment B). The Draft Permit, Technical Summary, Executive Director's Preliminary Decision, and Executive Director's Response to Public Comment can be found in the Agenda backup materials filed for the Commission's consideration.

**I. Introduction**

***A. Facility Description***

SouthWaste Disposal, 16350 Park Ten Place #215, Houston, Texas 77084 currently operates a composting facility located at 20805 Old Lamm Road, Elmendorf, Bexar County, Texas 78112. The facility consists of a 28.6-acre tract of land located less than one mile southeast of the intersection of Interstate Highway 37 and Loop 1604. The facility processes waste products such as grease trap waste into beneficial reuse compost. The permitted facility includes bulk material chipping and storage areas, a lined grease trap waste/septic/sewage sludge (GSS) processing area (composting pad), separate composting areas for other approved wastes, retention pond, post-processing area, aboveground feedstock storage tanks, and office areas (which include toilet and

potable water facilities). GSS composting and curing processes are restricted to this lined GSS processing area, which comprises 6.5 acres of the facility.

### ***B. Application Description***

SouthWaste Disposal has applied to the TCEQ for a permit amendment to authorize changes to the hours of operation, equipment used, energy and mass balance calculations, closure and post-closure care plan, and increase the amount of feedstocks received at the composting site. The LSA Application, if granted, would change the hours of operation from 7:00 am to 6:00 pm to 8:00 am to 5:00 pm, Monday through Friday. The equipment used would change the above ground storage tanks from ten 18,000-gallon tanks to four 30,000-gallon tanks. The energy and mass balance calculations, which are used to determine the expected final product quantity from the processing of specified amounts of bulking material and feedstocks, would be updated to reflect proposed feedstocks increase. The closure and post-closure care plan would change the current cost of the anticipated closure from \$356,621 to \$599,497. The amount of feedstocks received at the composting site would increase from 36,400 tons to 73,000 tons annually. During normal operations, the processing area contains multiple rows of compost in various stages of maturity. The volume of this immature compost is anticipated to change from approximately 8,840 cubic yards (approximately 4,860 tons) to 16,900 cubic yards (approximately 6,350 tons).

### ***C. Procedural Background***

The LSA Application was received on August 7, 2023. An administrative Notice of Deficiency letter (NOD) was mailed on August 15, 2023. A response to the NOD was sent on August 18, 2023. The LSA Application was declared administratively complete on September 6, 2023. The Notice of Receipt of Application and Intent to Obtain Municipal Solid Waste Permit Amendment (NORI) was issued on September 6, 2023, and mailed on September 13, 2023. The NORI was published on September 10, 2023, in Spanish in *La Prensa Texas* and on September 14, 2023, in *San Antonio Express-News* (both in Bexar County, Texas).

A technical NOD was mailed on October 10, 2023. A response to the NOD was sent on October 17, 2023. The Executive Director completed the technical review of the LSA Application on March 18, 2024. The Notice of Application and Preliminary Decision was published on March 22, 2024, in *San Antonio Express-News*; and on March 24, 2024, in Spanish in *La Prensa Texas* (both in Bexar County, Texas). The public comment period for the LSA Application ended on April 23, 2024. On June 18, 2024, the Executive Director filed a Response to Public Comment as required by Title 30 of the Texas Administrative Code (30 TAC) § 55.156. On June 25, 2024, the Executive Director preliminarily determined that the LSA application meets the requirements of applicable law and is to be considered before the commissioners at a regularly scheduled public meeting before any action is taken on this application unless all requests for contested case hearing or reconsideration have been withdrawn before that meeting. The 30-day

period to request a contested case hearing or reconsideration of the executive director's decision ended on July 25, 2024.

This application was filed on or after September 1, 2015; therefore, this application is subject to the procedural requirements adopted pursuant to House Bill 801, 76th Legislature (1999) and Senate Bill 709, 84th Legislature (2015), both implemented by the Commission in its rules under 30 TAC Chapters 39, 50, and 55.

## **II. Evaluation of Hearing Requests**

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment, and the Commission's consideration of hearing requests. SB 709 amended the requirements for comments and contested case hearings. One of the changes required by SB 709 is that the Commission may not find that a "hearing requestor is an affected person unless the hearing requestor timely submitted comments on the permit application." Texas Water Code (TWC) § 5.115(a-1)(2)(B).

### ***A. Legal Authority to Respond to Hearing Requests***

"The [E]xecutive [D]irector, the public interest counsel, and the applicant may submit written responses to [hearing] requests . . ."¹

"Responses to hearing requests must specifically address:

- (1) whether the requestor is an affected person;
- (2) which issues raised in the hearing request are disputed;
- (3) whether the dispute involves questions of fact or law;
- (4) whether the issues were raised during the public comment period;
- (5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director's Response to Comment;
- (6) whether the issues are relevant and material to the decision on the application; and
- (7) a maximum expected duration for the contested case hearing."²

### ***B. Hearing Request Requirements***

For the Commission to consider a hearing request, the Commission must first determine whether the request meets certain requirements.

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¹ 30 TAC § 55.209(d).

² 30 TAC § 55.209(e).

“A request for a contested case hearing by an affected person must be in writing, . . . filed with the chief clerk within the time provided . . . , [based only on the requestor’s timely comments, and] may not be based on an issue that was raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director’s Response to Comment.”<sup>3</sup>

“A hearing request must substantially comply with the following:

- (1) give the name, address, daytime telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who shall be responsible for receiving all official communications and documents for the group;
- (2) identify the person’s justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor’s location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- (3) request a contested case hearing;
- (4) . . . list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the [C]ommission’s determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the [E]xecutive [D]irector’s responses to the requestor’s comments that the requestor disputes, the factual basis of the dispute, and list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application.”<sup>4</sup>

***C. Requirement that Requestor be an Affected Person***

In order to grant a contested case hearing, the Commission must determine that a requestor is an affected person.

- (a) “For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest.

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<sup>3</sup> 30 TAC § 55.201(c).

<sup>4</sup> 30 TAC § 55.201(d).

- (b) . . . Governmental entities, including local governments and public agencies, with authority under state law over issues raised by the application may be considered affected persons.
- (c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
  - (1) whether the interest claimed is one protected by the law under which the application will be considered;
  - (2) distance restrictions or other limitations imposed by law on the affected interest;
  - (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
  - (4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
  - (5) likely impact of the regulated activity on use of the impacted natural resource by the person;
  - (6) . . . whether the requestor timely submitted comments on the application that were not withdrawn; and
  - (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.
- (d) [In making this determination,] the [C]ommission may also consider the following:
  - (1) the merits of the underlying application and supporting documentation in the [C]ommission's administrative record, including whether the application meets the requirements for permit issuance;
  - (2) the analysis and opinions of the [E]xecutive [D]irector; and
  - (3) any other expert reports, affidavits, opinions, or data submitted by the [E]xecutive [D]irector, the applicant, or hearing requestor.”<sup>5</sup>

#### ***D. Referral to the State Office of Administrative Hearings***

“When the [C]ommission grants a request for a contested case hearing, the [C]ommission shall issue an order specifying the number and scope of the issues to be referred to [SOAH] for a hearing.”<sup>6</sup> “The [C]ommission may not refer an issue to SOAH for a contested case hearing unless the [C]ommission determines that the issue: (1) involves a disputed question of fact or a mixed question of law and fact; (2) was

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<sup>5</sup> 30 TAC § 55.203.

<sup>6</sup> 30 TAC § 50.115(b).

raised during the public comment period . . . by an affected person . . .; and (3) is relevant and material to the decision on the application.”<sup>7</sup>

### **III. Analysis of the Requests**

The Executive Director has analyzed the hearing requests to determine whether they comply with Commission rules, who qualifies as an affected person, what issues may be referred for a contested case hearing, and the appropriate duration of the hearing.

#### ***A. Whether the Individual Requestors Complied with 30 TAC § 55.201(c) and (d).***

##### **i. Individuals the Executive Director Recommends the Commission Find are Affected Persons**

The Executive Director reviewed the factors in 30 TAC §§ 55.201(c) and (d) and 55.203 for determining if a requestor is an affected person and recommends the Commission find that the following requestors are affected persons. All hearing requests were in writing, provided the required contact information, and raised the issues that are the basis of the individual hearing requests in the requestors’ timely comments.

##### **1. Vincent Arreguin**

The Executive Director reviewed the factors found in 30 TAC §§ 55.201(c) and (d) and 55.203 for determining if a person is an affected person and recommends the Commission find that Vincent Arreguin is an affected person.

The residential address provided by Vincent Arreguin is approximately 2.29 miles southwest from the facility. The commercial address provided by Vincent Arreguin is much closer, slightly less than 1/2 mile north of the facility.

Vincent Arreguin submitted two timely hearing requests in writing, provided the required contact information, and raised the issues that are the basis of his hearing request in his timely comments.

In his hearing requests, Vincent Arreguin raised several concerns, including odors, potential impacts of expanded operations on his properties, and negative health effects that emissions could have on children and nearby residents, especially those with asthma and other respiratory concerns. Vincent Arreguin also states that he is unable to use and enjoy his properties by spending time outdoors or sleeping with the windows open at night, and that the facility’s odors have caused a lack of interest in his commercial property. Based on the location and distance of Vincent Arreguin’s properties and the issues he raised, the Executive Director has determined that Vincent Arreguin has demonstrated that he has a personal justiciable interest in the application

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<sup>7</sup> 30 TAC § 50.115(c).

that is not common to members of the general public, and therefore, is an affected person.

In his request, Vincent Arreguin raised Issues 1 and 2, which the Executive Director recommends referring. Vincent Arreguin also raised Issue 3, which the Executive Director does not recommend referring.

## **2. Kathryn Avila**

The Executive Director reviewed the factors found in 30 TAC §§ 55.201(c) and (d) and 55.203 for determining if a person is an affected person and recommends the Commission find that Kathryn Avila is an affected person.

The address provided by Kathryn Avila is approximately 1 mile west-northwest from the facility. Kathryn Avila submitted a timely hearing request in writing, provided the required contact information, and raised the issues that are the basis of her hearing request in her timely comments.

In her hearing request, Kathryn Avila raised several concerns, including odors impacting her in and around her home, potential impacts of expanded operations on the surrounding businesses, and negative health effects that emissions could have on children and nearby residents, especially those with asthma and other respiratory concerns. Kathryn Avila also states that she is unable to spend time outdoors at her property and that odors permeating into her home cause her to experience nausea. Based on the location, distance, and direction of Kathryn Avila's property and the issues she raised, the Executive Director has determined that Kathryn Avila has demonstrated that she has a personal justiciable interest in the application that is not common to members of the general public, and therefore, is an affected person.

In her request, Kathryn Avila raised Issues 1 and 2, which the Executive Director recommends referring. Kathryn Avila also raised Issue 3, which the Executive Director does not recommend referring.

## **ii. Individuals the Executive Director Does Not Recommend the Commission Find are Affected Persons**

### **1. Ashley Perez**

The Executive Director reviewed the factors found in 30 TAC §§ 55.201(c) and (d) and 55.203 for determining if a person is an affected person and recommends the Commission find that Ashley Perez is NOT an affected person because of her distance from the facility and because she did not demonstrate a personal justiciable interest that would be affected by the application.

Ashley Perez submitted a timely hearing request in writing, provided the required contact information, and raised the issues that are the basis of her hearing request in her timely comments.

In her hearing request, Ashley Perez raised several concerns, including odors impacting her in and around her property, potential impacts of expanded operations on the surrounding businesses, and negative health effects that emissions could have on children and nearby residents, especially those with asthma and other respiratory concerns. Ashley Perez also states that she is unable to spend time outdoors at her property or conduct any kind of business there. However, it appears that Ashley Perez copied the substance of her comment from Vincent Arreguin, including a statement that she “[has] property located less than a block away” from the facility. This indicates that she lacks a personal justiciable interest that will be affected by the application. Additionally, although Ashley Perez did go on to provide a unique address when she submitted her comment, GIS mapping shows that location to be much further from the facility (1.57 miles) than Vincent Arreguin’s commercial property and Kathryn Avila’s residence.

Based on the lack of issues unique to her and her distance from the facility, the Executive Director has determined that Ashley Perez has not demonstrated that she has a personal justiciable interest in the application that is not common to members of the general public, and therefore, is not an affected person.

## **2. Rolando Ramirez**

The Executive Director reviewed the factors in 30 TAC §§ 55.201(c) and (d) and 55.203 for determining if a person is an affected person, and recommends the Commission find that Rolando Ramirez is NOT an affected person because of his location relative to the facility (4.42 miles) and because he did not demonstrate a personal justiciable interest that would be affected by the application.

Rolando Ramirez submitted a timely hearing request in writing, provided the required contact information, and raised the issues that are the basis of his hearing request in his timely comments.

In his hearing request, Rolando Ramirez raised several concerns in relation to his experience as the Superintendent of a local school district, Southside ISD. Rolando Ramirez refers to his experiences in managing odors at school facilities and concerns about potential impacts on air quality affecting students and staff. However, Rolando Ramirez’s comment is made in his individual capacity and does not constitute or refer to official action by Southside ISD’s board of trustees.

### ***B. Whether the Issues Raised May be Referred to SOAH for a Contested Case Hearing.***

The Executive Director has identified issues of disputed questions of fact or mixed questions of law and fact, raised during the comment period, in the requests for a contested case hearing, and relevant to the decision on the application that could be referred to SOAH if the Commission determines that a requestor is an affected person. The issues discussed were raised during the public comment period and addressed in



the Executive Director's Response to Public Comment (RTC). None of the issues were withdrawn. All issues identified in this response are considered disputed, unless otherwise noted.

**i. Disputed Issues of Fact that are Relevant and Material to the Commission's Consideration of the Application**

The Executive Director recommends that the Commission refer the following issues to SOAH for a Contested Case Hearing:

**1. Whether the amended permit, if issued, will cause nuisance odors.** (RTC Comment No. 1). The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown that the proposed changes will cause nuisance odors, that information would be relevant and material to a decision on the application.

This issue was raised by Vincent Arreguin and Kathryn Avila, who the Executive Director recommends the Commission find are affected persons. This issue was also raised by Ashley Perez and Rolando Ramirez, who the Executive Director recommends the Commission find are not affected persons.

**2. Whether the amended permit, if issued, will negatively impact human health, safety, or quality of life of the surrounding community.** (RTC Comment No. 3). The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown the draft permit does not provide sufficient controls to prevent a negative impact to human health, safety, or quality of life, that information would be relevant and material to a decision on the application.

This issue was raised by Vincent Arreguin and Kathryn Avila, who the Executive Director recommends the Commission find are affected persons. This issue was also raised by Ashley Perez and Rolando Ramirez, who the Executive Director recommends the Commission find are not affected persons.

**ii. Issues that are not Relevant or Material to the Commission's Consideration of the Application or that are Matters of Law or Policy**

**3. Whether the amended permit, if issued, will negatively affect businesses in the area.** (RTC Comment No. 2). The issue involves a disputed question of mixed fact and law, was raised during the comment period, and was not withdrawn; however, it is not relevant and material to a decision on the application.

The TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rule. Accordingly, the TCEQ lacks jurisdiction to

consider generalized economic or tax impacts in surrounding areas when determining whether to approve or deny a permit application.

#### **IV. Contested Case Hearing Duration**

If there is a contested case hearing on this application, the Executive Director recommends that the duration of the hearing be six months from the preliminary hearing to the presentation of a proposal for decision to the Commission.

#### **V. Requests for Reconsideration**

The TCEQ did not receive any Requests for Reconsideration regarding the application.

#### **VI. Executive Director's Recommendation**

The Executive Director recommends the following actions by the Commission:

1. The Executive Director recommends the Commission find that the following are affected persons and grant their hearing requests: Vincent Arreguin and Kathryn Avila.
2. The Executive Director recommends that the Commission find that all other requestors are not affected persons and deny their hearing requests.
3. If referred to SOAH, that the duration of the hearing be six months from the preliminary hearing to the presentation of the proposal for decision to the Commission.
4. If referred to SOAH, concurrently refer the matter to Alternative Dispute Resolution.
5. If referred to SOAH, refer Issues 1 and 2 listed above in Part III of this response:

**Whether the amended permit, if issued, will cause nuisance odors.** (RTC Comment No. 1). The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.

**Whether the amended permit, if issued, will negatively impact human health, safety, or quality of life of the surrounding community.** (RTC Comment No. 3). The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel  
Executive Director

Charmaine Backens, Deputy Director  
Environmental Law Division



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REPRESENTING THE EXECUTIVE  
DIRECTOR OF THE TEXAS COMMISSION  
ON ENVIRONMENTAL QUALITY

### CERTIFICATE OF SERVICE

I certify that on September 16, 2024, the Executive Director's Response to Hearing Requests and Requests for Reconsideration on the LSA Application by SouthWaste Disposal, LLC, for a MSW facility, Permit Number 2317, was filed with the TCEQ Office of the Chief Clerk and that a complete copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, inter-agency mail, electronic submittal, or by deposit in the U.S. Mail.



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Nicholas Pilcher, Staff Attorney  
Environmental Law Division

MAILING LIST  
SouthWaste Disposal, LLC  
TCEQ Docket No./TCEQ Expediente N.º 2024-1407-MSW;  
MSW Permit No./MSW Permiso N.º 2317

FOR THE APPLICANT/PARA EL SOLICITANTE

Ben Camacho  
Southwest Disposal, LLC  
16350 Park Ten Pl, Suite 215  
Houston, Texas 77084  
  
Spencer Harvey Parkhill  
800 South Polk Street, Suite 200  
Amarillo, Texas 79101

Mattie Neira  
Lloyd Gosselink Rochelle & Townsend PC  
816 Congress Avenue, Suite 1900  
Austin, Texas 78701

Jeffrey S. Reed  
Lloyd Gosselink Rochell & Townsend PC  
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Austin, Texas 78701

FOR THE EXECUTIVE DIRECTOR/PARA EL DIRECTOR EJECUTIVO  
via electronic mail/vía correo electrónico:

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Ryan Vise, Deputy Director  
Texas Commission on Environmental Quality  
External Relations Division  
Public Education Program, MC-108  
P.O. Box 13087  
Austin, Texas 78711

FOR PUBLIC INTEREST COUNSEL/PARA ABOGADOS DE INTERÉS PÚBLICO

via electronic mail/vía correo electrónico:

Garrett T. Arthur, Attorney  
Texas Commission on Environmental Quality  
Public Interest Counsel, MC-103  
P.O. Box 13087  
Austin, Texas 78711

FOR ALTERNATIVE DISPUTE RESOLUTION/PARA LA RESOLUCIÓN ALTERNATIVA DE DISPUTAS

via electronic mail/vía correo electrónico:

Kyle Lucas  
Texas Commission on Environmental Quality  
Alternative Dispute Resolution, MC-222  
P.O. Box 13087  
Austin, Texas 78711

FOR THE CHIEF CLERK/PARA EL SECRETARIO OFICIAL

via eFilings:

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

<https://www.tceq.texas.gov/goto/efilings>

REQUESTER(S)/INTERESTED PERSON(S)/ SOLICITANTE(S)/ PERSONA(S) INTERESADA(S)

See attached list/Ver lista adjunta.

REQUESTER(S)/ SOLICITANTE(S)

Arreguin, Vincent V.  
3024 Cenizo  
San Antonio Tx 78264-9504

Avila, Kathryn  
20415 Buffalo Rdg  
San Antonio Tx 78264-4026

Perez, Ashley  
3491 S Loop 1604 E  
San Antonio Tx 78264-9530

Ramirez, Rolando  
Southside ISD  
1460 Martinez Losoya Rd  
San Antonio Tx 78221-9648

# Attachment A



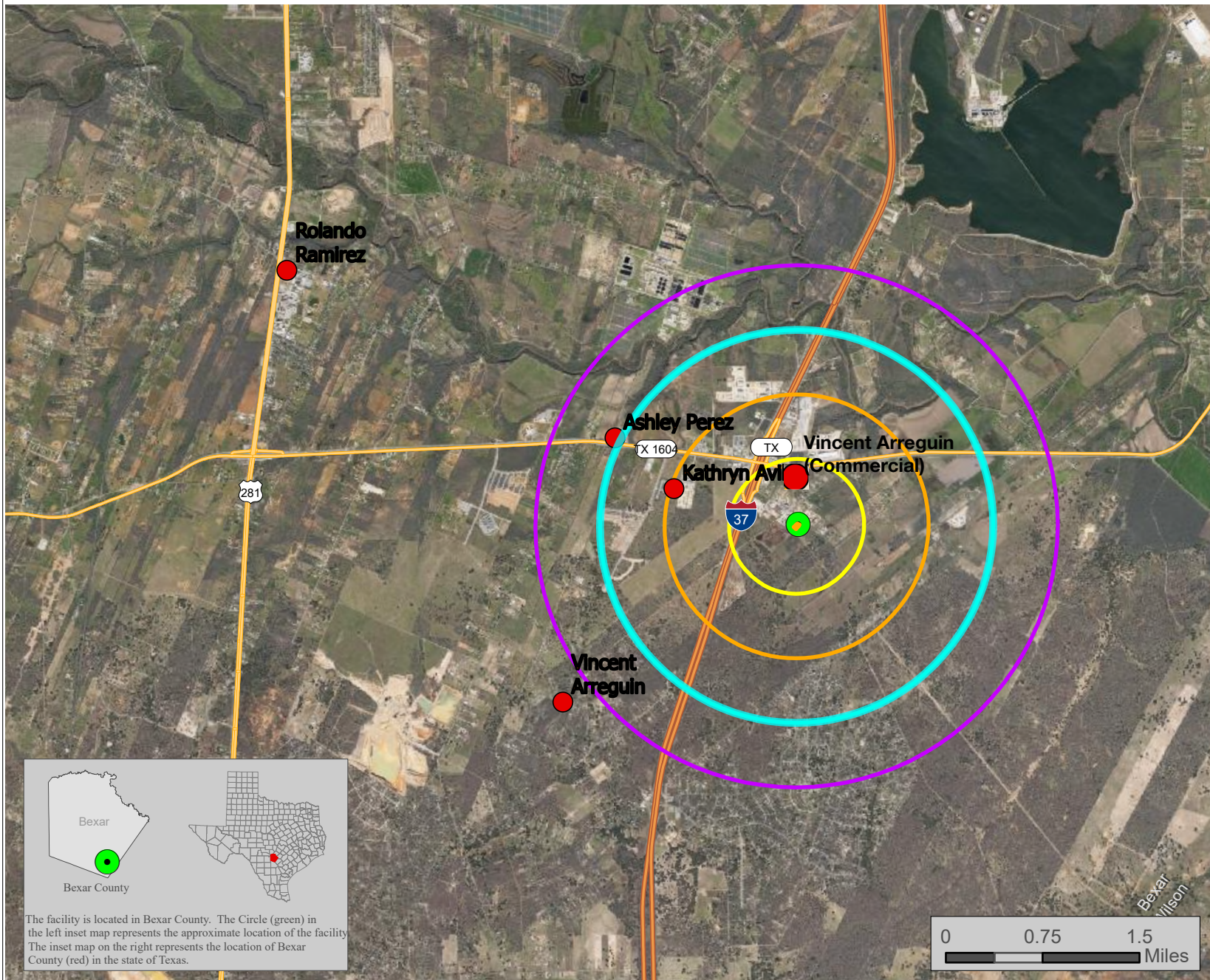
# Hearing Requests for SouthWaste Disposal, LLC MSW Permit No. 2317

Map Requested by TCEQ Office of Legal Services  
for Commissioners' Agenda



*Protecting Texas by  
Reducing and  
Preventing Pollution*

Texas Commission on Environmental Quality  
GIS Team (Mail Code 197)  
P.O. Box 13087  
Austin, Texas 78711-3087  
Date: 8/5/2024  
CRF 0109095Map  
Cartographer: PNeeruko



- Requestor Locations
- Facility Coordinate
- 0.5 Mile Facility Border
- 1 Mile Facility Border
- 1.5 Mile Facility Border
- 2 Mile Facility Border
- Facility Outline
- County Boundary

Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.

The facility is located in Bexar County. The Circle (green) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of Bexar County (red) in the state of Texas.

0 0.75 1.5 Miles



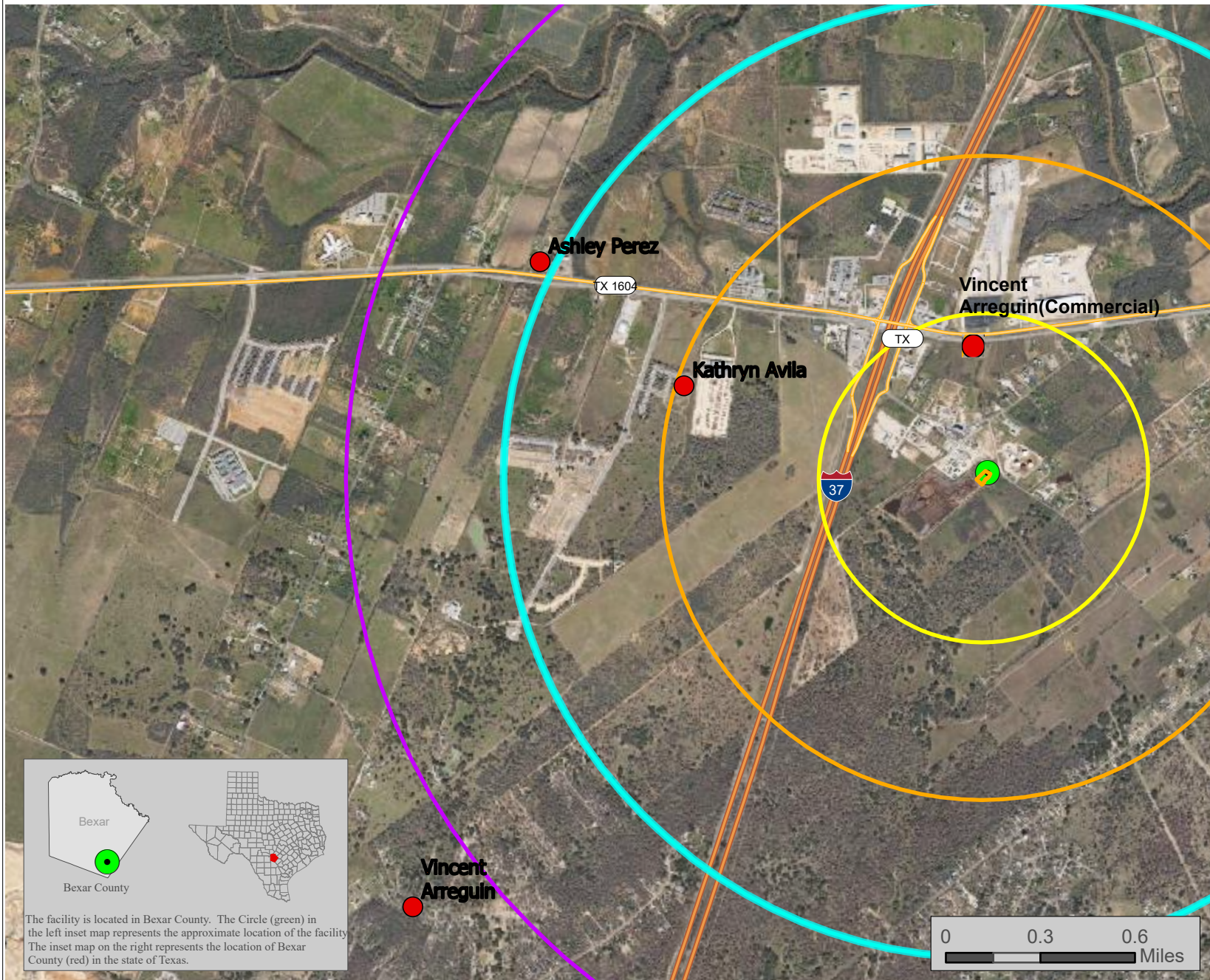
# Hearing Requests for SouthWaste Disposal, LLC MSW Permit No. 2317



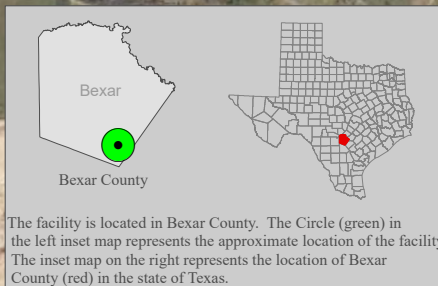
*Protecting Texas by  
Reducing and  
Preventing Pollution*

Map Requested by TCEQ Office of Legal Services  
for Commissioners' Agenda

Texas Commission on Environmental Quality  
GIS Team (Mail Code 197)  
P.O. Box 13087  
Austin, Texas 78711-3087  
Date: 8/5/2024  
CRF 0109095Map  
Cartographer: PNeeruko



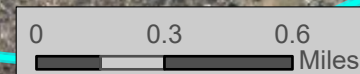
- Requestor Locations
- Facility Coordinate
- 0.5 Mile Facility Border
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The facility is located in Bexar County. The Circle (green) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of Bexar County (red) in the state of Texas.

Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor.

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# Attachment B

## 8.0 LANDOWNER LIST [§332.47(11)]

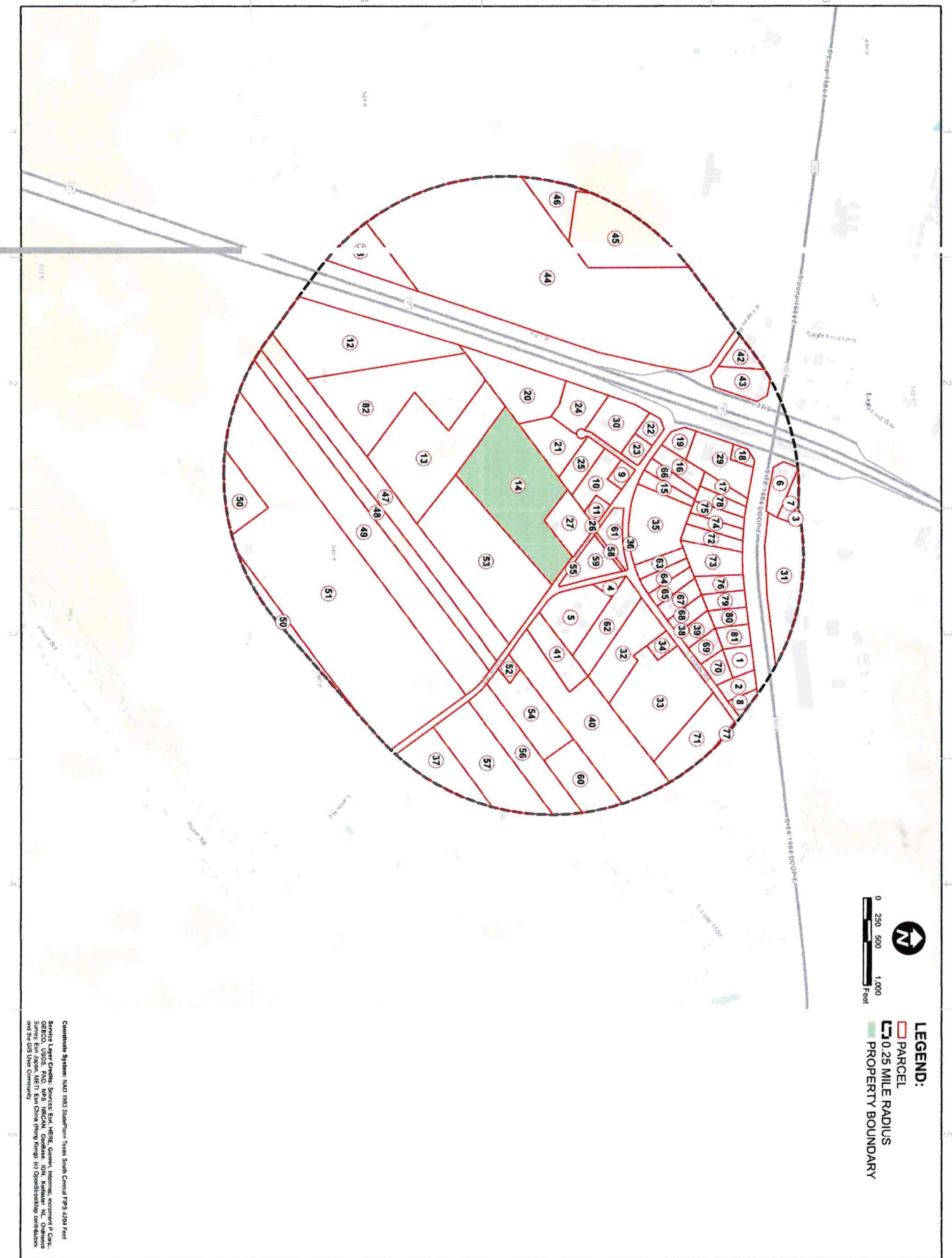
The following is a list of all landowners within ½ mile of the property boundaries. A map showing the location of each property and keyed to the table below is provided in Appendix J.

Map ID	Owner	Address	City	State	Zip
1	JKLB LLC	8118 DATAPOINT DR	SAN ANTONIO	TX	78229-3228
2	FLORES MARIA G	4581 S FLORES RD	ELMENDORF	TX	78112-9710
3	COMAL COUNTY METRO INV INC	PO BOX 1810	MCALLEN	TX	78505-1810
4	ENTERPRISE HYDROCARBONS LP	PO BOX 4018	HOUSTON	TX	77210-4018
5	THE SAN ANTONIO REFINERY LLC	1 BDA CROSSING STE 100	SAN ANTONIO	TX	78235
6	ELMENDORF METRO INVESTMENTS LLC	PO BOX 1810	MCALLEN	TX	78505-1810
7	BK METRO LAND COMPANY LTD	PO BOX 1810	MCALLEN	TX	78505-1810
8	VILLARREAL JOSE LUIS	112 CENTURY DR N	LAREDO	TX	78046-6001
9	LABUS PROPERTIES LLC	303 E ARMY TRAIL RD STE 205	BLOOMINGDALE	IL	60108-2143
10	MARKWARDT EDGAR K	109 CHEROKEE LN	SAN ANTONIO	TX	78232
11	CITY OF SAN ANTONIO/CITY PUBLIC SERVICE BOARD	145 NAVARRO ST	SAN ANTONIO	TX	78205-2934
12	TL REAL ESTATE HOLDINGS LLC	PO BOX 90504	SAN ANTONIO	TX	78209
13	RICHARDSON TIMOTHY G	20707 OLD LAMM RD	ELMENDORF	TX	78112-9627
14	SOUTHWASTE DISPOSAL LLC	16350 PARK TEN PL STE 215	HOUSTON	TX	77084-5053
15	RODRIGUEZ ROBERT	4271 S FLORES	ELMENDORF	TX	78112
16	ZAMORA LAWRENCE ALEXANDER	PO BOX 241390	SAN ANTONIO	TX	78224-8390
17	MENDEZ CARLOS JIL & MELENDEZ JOSE	5961 LABUS RD	ELMENDORF	TX	78112
18	MR W FIREWORKS INC	PO BOX 114	SOMERSET	TX	78069-114
19	BIG TEX TRAILER WORLD INC	950 INTERSTATE HIGHWAY 30 E	MT PLEASANT	TX	75455-7711
20	BOTA PARTNERS LLC	3707 N SAINT MARYS ST STE 201	SAN ANTONIO	TX	78212-3130
21	SERVISFLEET LEASING INC	1023 FERGUSON DR	HARLINGEN	TX	78550-9041
22	BOTA PARTNERS LLC	3707 N SAINT MARYS ST STE 201	SAN ANTONIO	TX	78212-3130
23	BOTA PARTNERS LLC	3707 N SAINT MARYS ST STE 201	SAN ANTONIO	TX	78212-3130
24	SERVISFLEET LEASING INC	1023 FERGUSON DR	HARLINGEN	TX	78550-9041
25	BOTA PARTNERS LLC	3707 N SAINT MARYS ST STE 201	SAN ANTONIO	TX	78212-3130
26	BEXAR COUNTY	233 N PECOS LA TRINIDAD STE 420	SAN ANTONIO	TX	78207-3188
27	ENTERPRISE HYDROCARBONS LP	PO BOX 4018	HOUSTON	TX	77210-4018
28	HALLER LONNIE	21155 INTERSTATE 37 S LOT 1	ELMENDORF	TX	78112-4750
29	BIG TEX TRAILER WORLD INC	950 INTERSTATE HIGHWAY 30 E	MT PLEASANT	TX	75455-7711
30	BOTA PARTNERS LLC	3707 N SAINT MARYS ST STE 201	SAN ANTONIO	TX	78212-3130
31	NAVISTAR INC	2701 NAVISTAR DR	LISLE	IL	60532-3637



Map ID	Owner	Address	City	State	Zip
32	GAUTREAUX CAROL J EST OF	4460 S FLORES RD	ELMENDORF	TX	78112-9712
33	BRITO CELSA	1804 CYNTHIA LN	PALMHURST	TX	78573
34	BONANNO DOUGLAS MARK & RAELEE ERICA	4474 S FLORES	SAN ANTONIO	TX	78214
35	LUBRIZOL CORPORATION	29400 LAKELAND BLVD	WICKLIFFE	OH	44092-2298
36	WEST TEXAS GAS INC	211 N COLORADO ST	MIDLAND	TX	79701-4607
37	JOHNSON ROBERT KENNETH & BERNA E	4126 LAKECLIFF DR	HARKER HEIGHTS	TX	76548-8609
38	LA IGLESIA VEN A CRISTO	4475 S FLORES RD	ELMENDORF	TX	78112-9762
39	LOPEZ RAY	4475 S FLORES RD	ELMENDORF	TX	78112-9762
40	WHITE CLAW CRUDE LLC	5151 BELT LINE RD STE 715	DALLAS	TX	75254
41	SALINAS CELESTINO &	14439 BOXER BAY	LIVE OAK	TX	78233-7227
42	MCDONALD JIMMY D	4130 S LOOP 1604 E	SAN ANTONIO	TX	78264-9567
43	QT SOUTH LLC	4705 S 129TH EAST AVE	TULSA	OK	74134-7008
44	KORUS ERNEST R & MAGDALEN REVOCABLE TRUST	PO BOX 1092	PLEASANTON	TX	78064
45	DIAMOND ENVIRONMENTAL MGMNT LP	2900 NACOGDOCHES RD	SAN ANTONIO	TX	78217-5019
46	DIAMOND ENVIRONMENTAL MGMNT LP	2900 NACOGDOCHES RD	SAN ANTONIO	TX	78217-5019
47	CAMACHO GERONIMO S &	20927 LAMM RD	ELMENDORF	TX	78112-9629
48	CAMACHO GERONIMO S &	20927 LAMM RD	ELMENDORF	TX	78112-9629
49	LAMM & 37 DEVELOPMENT PARTNERS LTD	100 NE LOOP 410 STE 775	SAN ANTONIO	TX	78216
50	LAMM & 37 DEVELOPMENT PARTNERS LTD	100 NE LOOP 410 STE 775	SAN ANTONIO	TX	78216
51	LAMM & 37 DEVELOPMENT PARTNERS LTD	100 NE LOOP 410 STE 775	SAN ANTONIO	TX	78216
52	RAMIREZ MATTHEW	20934 LAMM ROAD	ELMENDORF	TX	78112
53	HETSKO EDWARD	804 MORNING DOVE LN	FRIENDSWOOD	TX	77546-3556
54	GONZALEZ ERNESTO	21022 LAMM RD	ELMENDORF	TX	78112-1100
55	BEXAR COUNTY	PO BOX 839950	SAN ANTONIO	TX	78283-3950
56	VILLARREAL ROBERTO	5563 LARKDALE DR	SAN ANTONIO	TX	78233-5079
57	JOHNSON ROBERT KENNETH & BERNA E	4126 LAKECLIFF DR	HARKER HEIGHTS	TX	76548-8609
58	GUAJARDO JOE A	212 NORTHCREST DR	SAN ANTONIO	TX	78213-2234
59	ENTERPRISE HYDROCARBONS LP	PO BOX 4018	HOUSTON	TX	77210-4018
60	TREVINO JUAN J	PO BOX 10773	SAN ANTONIO	TX	78210-773
61	LUBRIZOL CORPORATION	29400 LAKELAND BLVD	WICKLIFFE	OH	44092-2298
62	LUBRIZOL CORPORATION	29400 LAKELAND BLVD	WICKLIFFE	OH	44092-2298
63	MARTINEZ ROGELIO IRACHETA & IRACHETA JOE LUIS	8502 AHERN DR APT 216	SAN ANTONIO	TX	78216-5754
64	ALLSTATE PROPERTIES MGMT LLC - SERIES 2	7243 HIDDEN HLS N	SAN ANTONIO	TX	78244-1512
65	CLAKLEY DANNY T	4431 S FLORES RD	ELMENDORF	TX	78112-9762
66	RODRIGUEZ LUIS T & PEREZ ANNETTE	4521 S FLORES RD	ELMENDORF	TX	78112
67	LOPEZ REYNALDO & VIRGINIA	4475 S FLORES RD	ELMENDORF	TX	78112-9762

Map ID	Owner	Address	City	State	Zip
68	GONZALES HENRY M & TRACY L	4465 S FLORES RD	ELMENDORF	TX	78112-9762
69	LOPEZ REYNALDO	4475 S FLORES RD	ELMENDORF	TX	78112-9762
70	SANCHEZ DAVID BONILLA	34 MCLENNAN OAK	SAN ANTONIO	TX	78240
71	TYLAR REVOCABLE TRUST	1317 S CROCKETT DR	ABILENE	TX	79605-3637
72	ARREGUIN VINCENT	3024 CENIZO	SAN ANTONIO	TX	78264-9504
73	BLACKSTOCK RILEY JR	22706 RED MOUNTAIN DR	ELMENDORF	TX	78112
74	LOKA KRISHNA R	4204 ENGADINA PASS	ROUND ROCK	TX	78665-1270
75	MENDEZ CARLOS JIL & MELENDEZ JOSE	5961 LABUS RD	ELMENDORF	TX	78112
76	TEXAS UNITED LAND LLC	PO BOX 6760	PAHRUMP	NV	89041-6760
77	TYLAR REVOCABLE TRUST	1317 S CROCKETT DR	ABILENE	TX	79605-3637
78	MENDEZ CARLOS JIL & MELENDEZ JOSE	5961 LABUS RD	ELMENDORF	TX	78112
79	TEXAS UNITED LAND LLC	PO BOX 6760	PAHRUMP	NV	89041-6760
80	TEXAS UNITED LAND LLC	PO BOX 6760	PAHRUMP	NV	89041-6760
81	BARTLEY DAVID RUSSELL & HAILEY RUTH GUERRERO	4520 S LOOP 1604 E	ELMENDORF	TX	78112-9697
82	RICHARDSON TRACY	2909 MINERAL SPRINGS RD	LOCKHART	TX	78644-3989



**LEGEND:**  
[Red outline] PARCEL  
[Dashed line] 0.25 MILE RADIUS  
[Green fill] PROPERTY BOUNDARY

0 250 500 1,000 Feet



Coordinate System: NAD 1983 StatePlane Texas South Central FIPS 4201 Feet  
Service Layer Credits: Source: Esri, HERE, Garmin, Intermap, increment P Corp.,  
Swiss Federal Institute of Technology, DeLorme, NAVTEQ, United States Geological  
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and the GIS User Community

**Parkhill**



ISSUED FOR  
PERMITTING ONLY

**SOUTHWASTE DISPOSAL  
SAN ANTONIO FACILITY**  
TCEQ MSW PERMIT NO. 2317A



A WRM Company

**SOUTHWASTE DISPOSAL LLC**  
20005 OLD LAMAR RD  
EDINBURGH, TX 78112

**PROJECT NO.**  
MSW 21

DATE	DESCRIPTION

**LAND  
OWNERSHIP MAP  
FIG. J.1**