Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 24, 2022

TO: All interested persons.

RE: Highway 24 Transfer Station
MSW Permit No. 2411

Decision of the Executive Director.

The executive director has made a decision that the above-referenced permit application meets the requirements of applicable law. **This decision does not authorize construction or operation of any proposed facilities.** This decision will be considered by 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any action is taken on this application unless all requests for contested case hearing or reconsideration have been withdrawn before that meeting.

Enclosed with this letter are instructions to view the Executive Director's Response to Public Comment (RTC) on the Internet. Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov. A complete copy of the RTC (including the mailing list), complete application, draft permit and related documents, including public comments, are available for review at the TCEQ Central Office. Additionally, a copy of the complete application, the draft permit, and executive director's preliminary decision are available for viewing and copying at the Commerce Public Library, 1210 Park Street, Commerce, Hunt County, Texas 75428.

If you disagree with the executive director's decision, and you believe you are an "affected person" as defined below, you may request a contested case hearing. In addition, anyone may request reconsideration of the executive director's decision. The procedures for the commission's evaluation of hearing requests/requests for reconsideration are located in 30 Texas Administrative Code Chapter 55, Subchapter F. A brief description of the procedures for these two requests follows.

How to Request a Contested Case Hearing.

It is important that your request include all the information that supports your right to a contested case hearing. Your hearing request must demonstrate that you meet the applicable legal requirements to have your hearing request granted. The commission's consideration of your request will be based on the information you provide.

The request must include the following:

(1) Your name, address, daytime telephone number, and, if possible, a fax number.

(2) The name of the applicant, the permit number and other numbers listed above so that your request may be processed properly.

(3) A statement clearly expressing that you are requesting a contested case hearing. For example, the following statement would be sufficient: "I request a contested case hearing."

(4) If the request is made by a group or association, the request must identify:

(A) one person by name, address, daytime telephone number, and, if possible, the fax number, of the person who will be responsible for receiving all communications and documents for the group;

(B) the comments on the application submitted by the group that are the basis of the hearing request; and

(C) by name and physical address one or more members of the group that would otherwise have standing to request a hearing in their own right. The interests the group seeks to protect must relate to the organization's purpose. Neither the claim asserted nor the relief requested must require the participation of the individual members in the case.

Additionally, your request must demonstrate that you are an **"affected person."** 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. Your request must describe how and why you would be adversely affected by the proposed facility or activity in a manner not common to the general public. For example, to the extent your request is based on these concerns, you should describe the likely impact on your health, safety, or uses of your property which may be adversely affected by the proposed facility or activities. To demonstrate that you have a personal justiciable interest, you must state, as specifically as you are able, your location and the distance between your location and the proposed facility or activities.

Your request must raise disputed issues of fact that are relevant and material to the commission's decision on this application that were raised **by you** during the public comment period. The request cannot be based solely on issues raised in comments that you have withdrawn.

To facilitate the commission's determination of the number and scope of issues to be referred to hearing, you should: 1) specify any of the executive director's responses to **your** comments that you dispute; 2) the factual basis of the dispute; and 3) list any disputed issues of law.

How to Request Reconsideration of the Executive Director's Decision.

Unlike a request for a contested case hearing, anyone may request reconsideration of the executive director's decision. A request for reconsideration should contain your name,

address, daytime phone number, and, if possible, your fax number. The request must state that you are requesting reconsideration of the executive director's decision, and must explain why you believe the decision should be reconsidered.

Deadline for Submitting Requests.

A request for a contested case hearing or reconsideration of the executive director's decision must be **received by** the Chief Clerk's office no later than **30 calendar days** after the date of this letter. You may submit your request electronically at www.tceq.texas.gov/agency/decisions/cc/comments.html or by mail to the following address:

Laurie Gharis, Chief Clerk
TCEQ, MC-105
P.O. Box 13087
Austin, Texas 78711-3087

Processing of Requests.

Timely requests for a contested case hearing or for reconsideration of the executive director's decision will be referred to the TCEQ's Alternative Dispute Resolution Program and set on the agenda of one of the commission's regularly scheduled meetings. Additional instructions explaining these procedures will be sent to the attached mailing list when this meeting has been scheduled.

How to Obtain Additional Information.

If you have any questions or need additional information about the procedures described in this letter, please call the Public Education Program, toll free, at 1-800-687-4040.

Sincerely,

Laurie Gharis

Laurie Gharis
Chief Clerk

LG/mt

Enclosure

EXECUTIVE DIRECTOR'S RESPONSE TO COMMENTS
for
Highway 24 Transfer Station
MSW Permit No. 2411

The Executive Director has made the Response to Public Comment (RTC) for the application by Highway 24 Transfer Station for MSW Permit No. 2411 available for viewing on the Internet. You may view and print the document by visiting the TCEQ Commissioners' Integrated Database at the following link:
https://www.tceq.texas.gov/goto/cid

In order to view the RTC at the link above, enter the TCEQ ID Number for this application (2411) and click the "Search" button. The search results will display a link to the RTC.

Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov.

Additional Information

For more information on the public participation process, you may contact the Office of the Public Interest Counsel at (512) 239-6363 or call the Public Education Program, toll free, at (800) 687-4040.

You may also view a copy of the RTC, the complete application, the draft permit, and related documents, including comments, at the TCEQ Central Office in Austin, Texas. Additionally, a copy of the complete application, the draft permit, and executive director's preliminary decision are available for viewing and copying at the Commerce Public Library, 1210 Park Street, Commerce, Hunt County, Texas 75428.

MUNICIPAL SOLID WASTE PERMIT NO. 2411

PERMIT APPLICATION BY HIGHWAY 24 TRANSFER STATION FOR NEW MUNICIPAL SOLID WASTE PERMIT NO. 2411	**§ § § § §**	**BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Public Comment (Response) on the application by Highway 24 Transfer Station (Applicant) for new Municipal Solid Waste (MSW) Permit No. 2411 and on the Executive Director's preliminary decision. As required by 30 Texas Administrative Code (TAC) Section (§) 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. This Response addresses all timely filed public comments received, whether or not withdrawn. Representative Bryan Slaton requested a Public Meeting. The Office of the Chief Clerk received timely comments from the persons in Attachment A.

This Response addresses all timely public comments received, whether withdrawn or not withdrawn, regarding the Application. If you need more information about this permit application or the wastewater permitting process, please call the TCEQ Public Education Program at 1-800-687-4040. General information about the TCEQ can be found at our website at http://www.tceq.texas.gov.

PROCEDURAL BACKGROUND

The application was received on August 18, 2021, and declared administratively complete on September 14, 2021. The Notice of Receipt of Application and Intent to Obtain Permit (NORI) was published on September 23, 2021 in the *Greenville Herald-Banner.* The Executive Director completed the technical review of the application on April 21, 2022 and prepared a Draft Permit. The Notice of Application and Preliminary Decision (NAPD) was published on May 5, 2022, the *Greenville Herald-Banner.* Notices of a Public Meeting were published in the *Greenville Herald-Banner* on April 5, April 12, and April 19, 2022. A public meeting was held on April 28, 2022 in Greenville, TX. The public comment period ended on June 6, 2022. 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 in 30 TAC Chapters 39, 50, and 55.

Highway 24 Transfer Station applied to the TCEQ for a permit to authorize construction and operation of a municipal solid waste transfer station. The facility is proposed to be located in Hunt County at 3491 Highway 24, Campbell, Texas 75422.

Access to Rules and Laws

Rules and Laws applicable to this application are accessible at the following URLs:

- The Texas Secretary of State hosts official versions of the Texas Administrative Code: www.sos.state.tx.us;
- TCEQ hosts rules under Title 30 Texas Administrative Code: www.sos.state.tx.us/tac/ (select "TAC Viewer" at the bottom of the page);

- The Texas Legislative Council hosts official versions of Texas statutes: www.statutes.legis.state.tx.us;
- TCEQ's public website provides a link to TCEQ rules under Title 30 Texas Administrative Code at SOS TAC Viewer and hosts unofficial versions of Title 30 Texas Administrative Code in downloadable Adobe PDF format: www.tceq.texas.gov/; and
- The U.S. Government's Publishing Office hosts Federal environmental laws and Federal rules including those under Title 40 Code of Federal Regulations (relating to Protection of the Environment): www.gpo.gov.
- Federal rules in Title 40 of the Code of Federal Regulations are available at the EPA's public webpage at epa.gov/laws-regulations/regulations.
- Federal environmental laws are available at the EPA's public webpage at epa.gov/laws-regulations/laws-and-executive-orders.
- General information about TCEQ can be found at the Commission's public webpage at tceq.texas.gov.
- Some documents located in the Office of the Chief Clerk may also be located on the Commissioner's Integrated Database at: https://www14.tceq.texas.gov/epic/eCID/.
- General information about TCEQ and information about the municipal solid waste permitting process is available at the Commission's public webpage at tceq.texas.gov.
- Information about the municipal solid waste permitting process is available from the TCEQ Public Education Program at 1-800-687-4040.

Commission records for this application and Draft Permit are available for viewing and copying in the Office of the Chief Clerk at the TCEQ's main office in Austin at 12100 Park 35 Circle, Building F, 1st Floor. Some documents located in the Office of the Chief Clerk may also be located on the Commissioner's Integrated Database at: https://www14.tceq.texas.gov/epic/eCID/.

COMMENTS AND RESPONSES

Comment 1: Location of Public Meeting

Travis Ball, Nicolas Scott noted that the public meeting was held 20 miles away from the location for the proposed transfer station and indicated that this led to inadequate participation, particularly from students at Texas A&M University-Commerce, which has a facility located roughly across the highway from the proposed location.

Response 1:

TCEQ's rules regarding public meetings require that a public meeting be held in the county in which the facility is proposed to be located, but the rules do not set a limit for the distance a public meeting venue may be from the proposed location under consideration at that meeting. The Executive Director does not have the authority to require the applicant to hold a meeting at a specific venue, such as those at the university property.

Comment 2. Agency Should See the Site and Surroundings

Randy Harp suggested that agency staff should see the proposed site and surroundings before issuing a permit.

Response 2:

The MSW rules do not require the Executive Director's staff visit a proposed location of a transfer station before issuing a permit. Staff took the opportunity to see the proposed location and survey the surrounding community before the public meeting held on April 28, 2022.

Comment 3: Concerns that Proposed Facility is or Will Become a Landfill

Travis Ball, Michael Beane, Ted Ray Crim, Sean Dawson, Cole Fleming, Stephen Gilcrest, Cathy Giles, Karen Hammons, Michael Hoffman, Katharine Knoodle, Alyssa Logston, and Liz Medina expressed concern that the proposed facility would be a landfill. Christopher Jeremy Brecheisen asked if the proposed facility could be converted to a landfill. Kelly Kuehl indicated that "transfer" is incorrect because waste would be dumped and processed.

Response 3:

The proposed facility is for an MSW transfer station, also referred to as a Type V MSW processing facility. Transfer stations receive waste, unload on a surface that protects underlying soil and groundwater and move this waste into trailers that compact the waste to combine multiple incoming loads into a single, typically longer trip. By rule, no disposal is allowed at Type V facilities. 30 TAC § 330.5(a)(3).

A Type V facility cannot be converted into a landfill, without the submission of an application, review, public notice, and issuance of a new landfill permit This new application would follow the same process of review that the current application has undergone, with the same opportunities for public meetings and public hearings.

Waste is unloaded at transfer stations, and by definition "transfer" is a form of processing under 30 TAC § 330.3(120). If by "dump" the comment means unloading, this is correct, but if by "dump" the comment implies a landfill or other final disposal at this location, the Draft Permit would not authorize it and this activity would be prohibited.[1]

Comment 4: Compaction of Waste

Jessie Moore asked why cities don't compact waste before transportation, why waste isn't compacted at the receiving landfill, and how much compacted waste would be stored at the proposed facility.

Response 4:

Compaction is not required for MSW generators or MSW facilities other than landfills. Compaction is a choice made by transfer stations to make their operation more efficient by allowing more waste to be transported at a time. MSW rules do not require a limit for compacted waste, but Parts I/II, Section 2.2.4 of the Application indicates that up to 500 tons of waste could be stored at the facility. This limit would include both compacted and uncompacted waste.

Comment 5: Application Review

Christopher Jeremy Brecheisen, David Alan Giles, and Jonathan Manning criticized the review process, suggesting that applications are "rubber-stamped" and noted that the engineer at the public meeting representing the Executive Director, indicated that 100% of applications he had reviewed were approved. Travis Ball, Jonathan Manning suggested that the review process is for show and asked how many applications have been denied recently. Christopher Jeremy Brecheisen asked if the TCEQ can be stricter than the United States Environmental Protection Agency (USEPA) and if so, requested examples. Christopher Jeremy Brecheisen further indicated that the applicant failed to meet federal Resource Conservation and Recovery Act (RCRA) requirements for a pre-application meeting with the community.

---

[1] 30 TAC § 330.3(120). Processing--Activities including, but not limited to, the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of waste, designed to change the physical, chemical, or biological character or composition of any waste to neutralize such waste, or to recover energy or material from the waste, or render the waste safer to transport, store, dispose of, or make it amenable for recovery, amenable for storage, or reduced in volume. The term does not include pyrolysis or gasification.

Response 5:

The Executive Director performs a through and objective review of all applications. The Commission hires Professional Engineers, Professional Geologists, and Environmental Specialists to review incoming MSW applications, reports, notifications, and other submittals. This Application was reviewed by Mr. Odil, a Professional Engineer and has been with the Commission over 18 years. He reviewed the application thoroughly and objectively, like all applications reviewed by the Executive Director's staff. Application reviews are conducted to identify all deficiencies and follow established procedures to help ensure all rule requirements are met for an administratively and technically complete application.

At the public meeting, Mr. Odil noted that 100% of applications he has reviewed have been issued, however, he was referring only to applications that were determined to be technically complete. Other MSW applications reviewed by Mr. Odil did not reach technical completion and were withdrawn. Reasons for withdrawal by an applicant vary but include unsatisfactory responses to issues identified by the Executive Director's staff. In the last five years, the MSW Permits Section issued approximately 80 new permits, permit amendments, and limited-scope permit amendments. During the same period, ten applications were withdrawn and one was returned.

TCEQ rules can be more restrictive than federal rules. Texas has authority from the USEPA to regulate these facilities under its rules, so the state program is expected to meet or exceed the federal program. Examples of where the TCEQ rules are more prescriptive include, but not limited to, approvals from other governmental entities when MSW activities may potentially impact items in their purview, like Texas Department of Transportation for road suitability, Texas Historical Commission for compliance with the Texas Antiquities Code, and Federal Emergency Management Agency for 100-year floodplain impacts; buffer and easement restrictions; surrounding land-use data; and website requirements. Pre-application meetings with the community are optional under 30 TAC Chapter 330.

Comment 6: Effect on Property Values and Local Tax Revenue

Amanda Adams, Janet Anderson, Christopher Babb, Travis Ball, Cathy Beane, Dave Bickley, Tami Bishop, Amy Braley, Kathryn Brandt, Christopher Jeremy Brecheisen, Daniel Clark, Tammy Colclasure, Ted Ray Crim, Ethan Elmore, Patrick Etie, Steven Ford, Daryl Wayne Freelen, Diana Fults, Cathy Giles, David Alan Giles, Jessica Gossett, Brett Harmon, Randy Harp, Sarah Helm, Kelly Kuehl, Joan Lambert, Jonathan Manning, Kayla Price, Brad Rabe, Nicholas Scott, Roy Lee Smalley, Lynn Sutherland, and Kevin Tibboel stated that the facility would decrease property values and affect local tax revenues.

Response 6:

The TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. The TCEQ does not have jurisdiction to consider property values or resulting changes to local tax revenue when determining whether to approve or deny an application for an MSW permit.

Comment 7: Applicant's Future Plans for Proposed Facility and Remainder of His Property

Reabeccah Tarrant asked if the facility would grow exponentially.

Response 7:

If the permit is issued, it would authorize acceptance of waste starting at 400 tons per day and increasing eventually to 1,000 tons per day, as indicated in Parts I/II, Sections 2.2.2 of the Application. The facility may not physically grow, unless the permit is modified or amended. The owner must apply for a permit amendment, which contains the same public involvement requirements, if the owner wants to exceed the waste acceptance rate of 1,000 tons per day.

Comment 8: Possibility of Future Sale of the Facility

Christopher Jeremy Brecheisen asked what would happen if the permit were issued and then the permittee sells the facility.

Response 8:

TCEQ rules allow MSW permits to be transferred to another person. If the permit is issued and the facility subsequently sold, the permit would be transferred through permit modification with notice of the transfer. The requirements of the permit would not change because of a permit transfer.

Comment 9: Unused Parts of Applicant's Property

Kathryn Brandt asked what the applicant plans to do with the part of his property that would not be used by the transfer station.

Response 9:

The MSW rules do not require applicants to describe the plans for properties they own outside of an authorization boundary, except to the extent that the property is associated with the facility.

Comment 10: Environmental Impact Study

Ted Ray Crim, Denise Morgan, and Bobby Stovall noted that an Environmental Impact Study (EIS) was not performed.

Response 10:

An environmental impact statement and compliance with the National Environmental Policy Act are not required as part of the MSW permitting process. The Commission's permitting rules are established to protect the environment consistent with the underlying authority provided by state statutes. The Executive Director has determined that all applicable rules are addressed by the Application.

Comment 11: Notice and Signs

Christopher Jeremy Brecheisen requested information on newspaper publication of notice, including the newspaper in which notice was published and the dates of publication, and requested a copy of the notice. Christopher Jeremy Brecheisen and Jonathan Manning stated that the signs were inadequate and could not be read as an individual drove down the highway at the speed limit.

Response 11:

The Executive Director determined that all applicable notice requirements have been met. Three notices have been published during review of this Application: a NORI, a NAPD, and Notices of Public Meeting. All notices were published in the *Greenville Herald-Banner*. The NORI was published on September 23, 2021, the NAPD was published May 5, 2022, and the public meeting notices were published April 5, April 12, and April 19, 2022.

Requirements for signs for pending MSW Applications are found in 30 TAC § 330.57(i)(3). These rules require a sign that is at least four feet by four feet with dark letters, at least three inches in height in a block printed capital lettering on a white background. The Executive Director has reviewed the application and preliminarily determined that it satisfies the regulatory requirements regarding public notice and signage for the proposed facility.

Comment 12: Traffic and Roads

Amanda Adams, Robin Alexander, Janet Anderson, Christy Andrzejewski, Christopher Babb, Travis Ball, Billy Rhea Beane, Cathy Beane, Michael Beane, Michele Benjamin, Jimmy Babb, Dave Bickley, Jay Boshart, Amy Braley, Christopher Jeremy Brecheisen, James Brown, Karla Burke, Daniel Clark, Ted Ray Crim, Jeffrey Cross, Sean Dawson, Amanda Delisle, Ethan Elmore, Patrick

Etie, Lory Foster, Daryl Wayne Freelen, Diana Fults, Stephen Gilcrest, David Alan Giles, Raymond Green, Connie Hale, Brett Harmon, Bunny Harmon, Randy Harp, Richard Helge, Anna Knutson, Susan Lousberg, Jonathan Manning, Ronald Manning, Barba McCord, Joe McCracken, Dustin McNeese, Mary Miller, Vickie Mize, Jessie Moore, Denise Morgan, Crystal Mumphrey, Kayla Price, Brad Rabe, Mark Rudin, Amanda Scott, Alison Soeder, Daniel Starks, Karen Starks, Bobby Stovall, Janis Stroope, Lynn Sutherland, Robert Sutherland, Texas A&M University-Commerce Student Government Association, Elizabeth Tarrant, Kevin Tibboel, Cyrus Vaughan, and Jill Wickersham shared concerns over traffic on Highway 24 in the vicinity of the proposed transfer station. Tammy Colclasure, Kelly Kuehl, and Jessie Moore indicated that the associated traffic would damage roads. Kelly Kuehl was concerned that this damage would cause an increase in taxes. Janis Stroope felt that a waste facility would be disrespectful to the Flying Tiger Memorial Highway. Jessie Moore asked questions about which towns will have contracts and what roads will be used to bring trash to the proposed facility.

Response 12:

In accordance with 30 TAC § 330.61(i), an Application for an MSW transfer station permit must include data on access roads for the proposed facility, including: availability and adequacy of roads that the owner or operator will use to access the site; volume of vehicular traffic on access roads within one mile of the proposed facility, both existing and expected, during the expected life of the facility; and projections on the volume of traffic expected to be generated by the facility on the access roads within one mile of the proposed facility. This information is provided in Parts I/II, Section 3.2 of the Application. Section 3.2.2 states that State Highway 24 is adequate to handle total projected volumes throughout the expected life of the facility.

When reviewing permit applications, the Executive Director defers to the Texas Department of Transportation (TxDOT) recommendations on traffic issues and the adequacy of state-maintained roadways to be used by a proposed MSW facility. Documentation of coordination with TxDOT, required under 30 TAC § 330.61(i)(4), is provided in Parts I/II, Appendix I/II-A.3 of the Application. As documented in the Application, TxDOT did not require road improvements in the vicinity of the proposed location.

The Executive Director is not authorized to consider the effect that a proposed facility will have on road maintenance or on taxes to address it. Nor is there any prohibition to locating MSW facilities along memorial highways. Other questions regarding contracts and traffic details beyond the scope described above are outside the authorization of the Executive Director.

Comment 13: Negative Impact on Community, Including Future Development

Amanda Adams, Robin Alexander, Christopher Babb, Yumei Bao, Michael Beane, Dave Bickley, Tami Bishop, Amy Braley, Christopher Jeremy Brecheisen, James Brown, Ashley Bryan, Karla Burke, Cathy Certain, Courtney Clanton, Ted Ray Crim, Ethan Elmore, Steven Ford, Lory Foster, Noah Garcia, David Alan Giles, Connie Hale, Randy Harp, Cody Helm, Sarah Helm, Anna Knutson, Joan Lambert, Alyssa Logston, Jonathan Manning, Liz Medina, Crystal Mumphrey, Kayla Price, Cynthia Ross, Nicholas Scott, Michael Stark, Daniel Starks, Lynn Sutherland, Elizabeth Tarrant, Kevin Tibboel, and Ashley Whitmore were concerned that the proposed facility would have a negative impact on their community, including future growth and development.

Response 13:

The TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. Accordingly, the TCEQ does not have jurisdiction to consider economic impacts, such as impacts to livelihoods, on surrounding areas when determining whether to approve or deny a permit application. Growth trends are discussed in Parts I/II, Section 2.4.3 of the Application. The discussion was based primarily on communication with Hunt County, which indicated that there were no plats for development within five miles of the transfer station as of November 2021. The ground survey of the area discussed in the

Application did not reveal any growth trends or direction of major development within five miles of the proposed location. The Executive Director has determined that adequate information on growth trends was provided in the Application.

Comment 14: Land-use Map

Kathryn Brandt stated that the land-use map provided in the Application did not properly represent her property at 5829 County Road (CR) 4223 or that of her neighbor at 5828 CR 4223.

Response 14:

The land use map is provided as Figure I/II-5 in the Application. Changes were made to this map during the Application review process. Land in the vicinity of 5828 and 5829 CR 4223 are, in the technically complete Application, characterized as residential. It is unclear how recharacterizing much of these properties as agricultural instead of residential would affect the land-use compatibility of the proposed facility. The Executive Director has determined that adequate information on the land-use map was provided in the Application.

Comment 15: Land-use Compatibility

Amanda Adams, Janet Anderson, Christopher Babb, Travis Ball, Dave Bickley, Kathryn Brandt, Christopher Jeremy Brecheisen, James Brown, Cathy Certain, Daniel Clark, Ted Ray Crim, Amanda Delisle, Patrick Etie, Lory Foster, Daryl Wayne Freelen, Raymond Green, Connie Hale, Anna Knutson, Joan Lambert, Leslee Lay, Barba McCord, Kayla Price, Brad Rabe, Mark Rudin, Amanda Scott, Michael Starks, Daniel Starks, Lynn Sutherland, Keith Tarrant, Reabeccah Tarrant, Cyrus Vaughan, and Vickie Wood indicated that the proposed facility was incompatible with the community where it would be located.

Response 15:

Applicants for transfer stations must provide information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest. Specifically, an applicant must provide information, including an available published zoning map for the facility and within two miles of the facility for the county or counties in which the facility will be located; information about the character of the surrounding land uses within one mile of the proposed facility; information about growth trends within five miles of the facility with directions of major development; information on the proximity of the facility to residences, business establishments, and other uses within one mile, such as schools, churches, cemeteries, historic structures and sites, archaeologically significant sites, and sites having exceptional aesthetic quality; information regarding all known wells within 500 feet of the site; and any other information requested by the Executive Director.

The Applicant provided the required information in its Application; specifically, in Parts I/II, Section 3.1, and Figure I/II-5, Land Use Map. The Application indicates that surrounding land use within one mile of the proposed permit boundary is 58.4% open space, 21% institutional, 6.8% residential, 6.5% commercial, 4.7% agricultural, and 2.3% water bodies. The Application indicates there are 90 residences and 10 businesses within one mile of the proposed permit boundary. The nearest residence is about 150 feet from the proposed transfer station. No licensed daycare facilities or hospitals were identified within one mile. A country club and golf course are located about 1/2 mile to the east. No other parks and recreational areas were identified. Property containing facilities associated with Texas A&M University-Commerce is located across State Highway 24 to the west of the proposed transfer station. No other schools were identified within one mile. There are no known churches or cemeteries within one mile. Based on review from the Texas Historical Commission, no historical properties, archeological sites, or other cultural resources are present or would be affected by the proposed facility. Parts I/II, Section 3.1.1 of the Application indicates that the proposed location is outside of the

incorporated limits of any city and is therefore not subject to any known city zoning ordinances.

The use of any land for a MSW facility must not adversely impact human health and the environment. (30 TAC § 330.61(h)). The TCEQ rules do not establish specific limits on these factors and only require that an applicant provide current and accurate information regarding these factors in the application. The Executive Director has determined that adequate information on land-use compatibility was provided in the Application.

Comment 16: Texas Parks and Wildlife Department (TPWD) Recommendations

Karen Hardin, representing the Texas Parks and Wildlife Department (TPWD), provided suggestions for design and operation of the proposed facility if the permit is issued. These recommendations include: periods when no vegetation clearing would occur, pre-clearance surveys, minimization of exterior lighting, disturbance-free buffers along natural features, relocation of potentially affected native aquatic resources; preparation of and adherence to an aquatic invasive species transfer prevention plan; precautions to avoid impacts to Species of Greatest Conservation Need (SGCN) flora and fauna; minimization of disturbances to prairie vegetation; and avoidance of non-native species such as bermudagrass in seeding or revegetation plans.

Similarly, Christy Andrzejewski, Michelle Babb, Cathy Beane, Christopher Jeremy Brecheisen, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Steven Ford, Noah Garcia, Alicia Guerra, Connie Hale, Mike Hale, Bunny Harmon, Randy Harp, Kelly Kuehl, Leslee Lay, Chelsea Morse, Jared Mumm, Mark Rudin, Amanda Scott, Robert Sutherland, Elizabeth Tarrant, Reabeccah Tarrant, and Ashley Whitmore felt that the proposed facility would adversely affect wildlife and livestock in its vicinity.

Response 16:

An applicant for an MSW transfer station must consider the impact of the proposed facility on endangered or threatened species under 30 TAC § 330.61(n). The Application addresses these requirements in Parts I/II, Section 3.6 and in Parts I/II, Appendix II-B of the Application.

The TCEQ protects human health and the environment through the implementation and enforcement of 30 TAC Chapter 330 and other applicable regulations. The Executive Director has reviewed the application and preliminarily determined that it satisfies the statutory and regulatory requirements concerning protected wildlife, wildlife habitats, and livestock.

Comment 17: Health and Welfare of Residents

Billy Rhea Beane, Cathy Beane, Michael Beane, Michele Benjamin, Dave Bickley, Tami Bishop, Christopher Jeremy Brecheisen, Brenda Contreras, Sean Dawson, Daryl Wayne Freelen, Cathy Giles, David Alan Giles, Karen Hammons, Bunny Harmon, Leslee Lay, Vickie Mize, Chelsea Morse, Cynthia Ross, Nicholas Scott, Leanne Stevens, Bobby Stovall, Lynn Sutherland, Robert Sutherland, Elizabeth Tarrant, Reabeccah Tarrant, and Ashley Whitmore shared their concerns that the facility would have a detrimental effect on the health and welfare of residents.

Christopher Jeremy Brecheisen asked if the TCEQ considered:

1) the science that solid waste facilities, and its associated activities, has the potential to cause health and safety threats to life forms (humans, animals or plants) in the areas where they operate; and

2) the science that exposure to toxic elements in the environment can negatively impact the development of fetuses during pregnancy, or be detrimental to the development of young children?

Similarly, Christopher Jeremy Brecheisen asked the TCEQ to list the potential threats to the public's personal health and safety, as it relates to solid waste projects such as this proposed Solid Waste Transfer Station and the likelihood or probability of these threats occurring.

Response 17:

The Texas Solid Waste Disposal Act (TSWDA) in Chapter 361 of the Texas Health and Safety Code (THSC) and 30 TAC Chapter 330 were promulgated to protect human health and the environment. The role of the TCEQ is to ensure that authorized facilities are designed, constructed, and operated according to applicable rules that protect human health and the environment. The Executive Director has reviewed the application and preliminarily determined that the facility, operated according to the permit provisions, the TSWDA, and 30 TAC Chapter 330, would adequately protect human health and the environment and prevent adverse health and environmental impacts.

Comment 18: Effects on Texas A&M University-Commerce and Related Activities

Adams, Alexander, Christopher Babb, Travis Ball, Dave Bickley, Tami Bishop, Cinda Boshart, Aden Boyer, Christopher Jeremy Brecheisen, Courtney Clanton, Daniel Clark, Ted Ray Crim, Amanda Delisle, Ethan Elmore, Lory Foster, Diana Fults, Noah Garcia, Stephen Gilcrest, David Alan Giles, Raymond Green, Connie Hale, Randy Harp, Richard Helge, James Hudson, Autumn Johnson, Alyssa Logston, Jonathan Maning, Barba McCord, Tina McCord, Liz Medina, Denise Morgan, Jared Mumm, Crystal Mumphrey, Kayla Price, Mark Rudin, Tim Schauer, Amanda Scott, Alison Soeder, Michael Stark, Daniel Starks, Leanne Stevens, Bobby Stovall, Janis Stroope, Lynn Sutherland, Texas A&M Commerce Student Government Association, Kristi Taylor, Mickey Trusty, James Wickersham, and Jill Wichersham expressed their concern about the effect that the proposed facility would have on the Texas A&M University-Commerce facility located across Highway 24.

Similarly, Randy Harp and Jared Mumm indicated that the facility would have a detrimental effect on research at the facility and its funding.

Response 18:

The TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. Accordingly, the TCEQ does not have jurisdiction to consider economic impacts, such as impacts to livelihoods, research, or research funding, on surrounding areas when determining whether to approve or deny a permit application.

The Executive Director has reviewed the application and preliminarily determined that the facility, operated according to the permit provisions and 30 TAC Chapter 330, would adequately protect human health and the environment and prevent adverse health and environmental impacts.

Comment 19: Location

Christopher Babb, Christopher Jeremy Brecheisen, Daniel Clark, Ted Ray Crim, Jeffery Cross, Michael Hoffman, Jonathan Manning, Chelsea Morse, Janis Stroope, and Reabeccah Tarrant indicated that the proposed transfer station is not needed. Some of these individuals noted that the Maloy landfill in Campbell is approximately five miles away from the proposed location. Christy Andrzejewski, Travis Ball, Yumei Bao, Ted Ray Crim, Ethan Elmore, Diana Fults, Randy Harp, James Hudson, Susan Lousberg, Vickie Mize, and James Wichersham indicated that the proposed facility should be located somewhere else. Amanda Adams stated that the proposed facility would have no benefit to the community. Christopher Jeremy Brecheisen, Jonathan Manning, and Bobby Stovall indicated that the proposed location is bad or unusual. Travis Ball asked where transfer stations are typically found. Travis Ball indicated that the proposed location is not optimal and recommended the reconsideration of the North Central Texas Council of Governments (NCTCOG) approval of the proposed location.

Response 19:

TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. TCEQ does not have the authority to specify locations for transfer stations or to suggest alternatives to the location that the Applicant has proposed for the facility. The Executive Director is only permitted to review the application, as the Applicant has submitted it, for compliance with all applicable rules.

In accordance with Texas Health and Safety Code Chapter 363 and 30 TAC Chapter 330, a council of government reviews MSW applications to determine conformance with the COG's Regional Solid Waste Plan (RSWP). North Central Texas COG indicated that the proposed facility conforms with their RSWP.

Comment 20: General Opposition

Jay Boshart and Jonathan Manning asked if Commission staff would want this facility in their backyard.

Response 20:

TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. TCEQ does not have the authority to specify locations for transfer stations or to suggest alternatives to the location that the Applicant has proposed for the facility. The Executive Director is only permitted to review the application, as the Applicant has submitted it, for compliance with all applicable rules.

Comment 21: Effects on Soil Quality, Agriculture, and Vegetation

Cathy Beane, Dave Bickley, Cinda Boshart, Ted Ray Crim, Steven Ford, David Alan Giles, Connie Hale, Bunny Harmon, Tina McCord, Liz Medina, Denise Morgan, Jared Mumm, Crystal Mumphrey, Texas A&M University-Commerce Student Government Association, Elizabeth Tarrant, Reabeccah Tarrant, and Ashley Whitmore expressed concern that the facility would affect soil quality, agriculture, and vegetation.

Response 21:

The Texas Solid Waste Disposal Act (TSWDA) in Chapter 361 of the Texas Health and Safety Code (THSC) and 30 TAC Chapter 330 were promulgated to protect human health and the environment. The role of the TCEQ is to ensure that authorized facilities are designed, constructed, and operated according to applicable rules that protect human health and the environment. The Executive Director has reviewed the application and preliminarily determined that the facility, operated according to the permit provisions, the TSWDA, and 30 TAC Chapter 330, would adequately protect human health and the environment and prevent adverse health and environmental impacts. Waste is unloaded on concrete foundations and transferred to long-haul containers. Liquids that are released from this waste must be managed as contaminated water. Unpermitted discharge of contaminated water is prohibited under 30 TAC § 330.207(a). Contaminated water management is addressed in greater detail below.

Comment 22: Environmental Justice

Kayla Price and Nicholas Scott believe that the proposed facility represents an environmental injustice.

Response 22:

TCEQ is committed to protecting human health and the environment for all Texans throughout the state. When evaluating permits that would authorize transfer stations facilities, TCEQ considers the surrounding community without regard to its socioeconomic or racial status.

The TCEQ encourages participation in the permitting process. The Office of the Chief Clerk works to help the public and neighborhood groups participate in the regulatory process to ensure that agency programs that may affect human health or the environment operate without discrimination and to make sure that concerns are considered thoroughly and are handled in a

way that is fair to all. You may contact the Office of the Chief Clerk at 512-239-3300 for further information. More information may be found on the TCEQ website: https://www.tceq.texas.gov/agency/decisions/participation/title-vi-compliance.

Comment 23: Waste Acceptance, Including Sources of Waste

Christopher Jeremy Brecheisen, Tammy Colclasure, Sean Dawson, Connie Hale, Karen Hammons, Randy Harp, John Kirkpatrick, and Katharine Knoodle asked about the types of waste that would be accepted at the proposed facility, including whether "Level 5" waste and hazardous waste would be accepted, and how there could be no limitations on the waste, as indicated in the Application.

Response 23:

In accordance with 30 TAC § 330.61(b), an application for a transfer station must include the sources and characteristics of waste to be received for storage or processing. This information is specified in Parts I/II, Section 2.2; Part IV, Section 2; and Appendix IV-1 of the Application. According to the Application, the Highway 24 Transfer Station will accept MSW resulting from, or incidental to municipal, community, commercial, institutional, and recreational activities, including garbage, putrescible wastes, rubbish, ashes, brush, street cleanings, automobile parts, construction-demolition waste, and yard waste; Class 2 non-hazardous industrial solid waste; Class 3 non-hazardous industrial solid waste; and special waste. The proposed facility will not accept wastes for which storage or processing are prohibited under 30 TAC § 330.15(e) or other wastes as specified in Parts I/II, Section 2.2.1 of the Application. These prohibited wastes include regulated hazardous waste, hazardous waste from very small quantity generators, polychlorinated biphenyl (PCB) waste, radioactive waste, regulated asbestos-containing materials, liquid waste, Class 1 industrial waste, used oil, used oil filters, whole used or scrap tires, and items containing chlorinated fluorocarbons (CFCs).

"Level 5" is not a designation for waste under MSW Rules; this appears to be a misunderstanding of the "Type V" designation in Chapter 330 for MSW storage and processing facilities. 30 TAC § 330.61(b)(1) requires an applicant to explain constituents or characteristics that could be a limiting parameter for an MSW facility. An early version of the application indicated that there were no limitations on the waste that would be accepted at the facility. During the review process the applicant clarified that if contaminant concentrations indicated the waste included Class 1 industrial waste, regulated hazardous waste, or characteristics indicating prohibited wastes (such as the presence of Polychlorinated biphenyls (PCB) waste or Regulated Asbestos Containing Materials (RACM), are limiting parameters and the waste would not be accepted at the transfer station.

Comment 24: Archeological Study

Connie Hale felt that an adequate archeological study was not performed for the proposed facility.

Response 24:

MSW rules do not directly require archeological studies. 30 TAC § 330.61(o) requires applicants coordinate with the Texas Historical Commission (THC) to document compliance with the Natural Resources Code, Chapter 191, Texas Antiquities Code. Correspondence between the Applicant and the THC is provided in Parts I/II, Appendix I/II-A.2. Section 3.1.5 of the Application notes that correspondence with the THC indicates that no archeological or historic sites, or sites with exceptional aesthetic qualities were identified on the proposed site. This section further indicates that there is a documented cultural resource located about 0.8 miles from the proposed site, but that the site has to be consistent with THC protocol. The Executive Director has determined that requirements to coordinate with the THC have been met.

Comment 25: Local Ordinance Issued December 28, 2021

Kevin Tibboel indicated that the Application is in violation of a local ordinance passed by the Commissions Court of Hunt County, Texas.

Response 25:

The Hunt County Commissioners Court passed an ordinance, effective December 28, 2021, that provides siting criteria for solid waste processing facilities. This Application was received on August 18, 2021 and administratively complete on September 14, 2021, which was prior to the ordinance effective date. In accordance with Texas Health and Safety Code § 364.012(e)(1), the county commissioners court may not prohibit the processing or disposal of MSW in an area of the county where an application for a permit has been filed with and is pending before the commission.

Comment 26: Effect on Students in Campbell Independent School District (ISD)

Denise Morgan shared her concern about the effect the proposed facility would have on students in the Campbell ISD.

Response 26:

The Texas Solid Waste Disposal Act (TSWDA) in Chapter 361 of the Texas Health and Safety Code (THSC) and 30 TAC Chapter 330 were promulgated to protect human health and the environment. The role of the TCEQ is to ensure that authorized facilities are designed, constructed, and operated according to applicable rules that protect human health and the environment. The Executive Director has reviewed the application and preliminarily determined that the facility, operated according to the permit provisions, the TSWDA, and 30 TAC Chapter 330, would adequately protect human health and the environment and prevent adverse health and environmental impacts.

Comment 27: Noise

Travis Ball, David Alan Giles, Randy Harp, Jessie Moore, Jared Mumm, Crystal Mumphrey, Jillian Nichols, Mark Rudin, Amanda Scott, Texas A&M University-Commerce Student Government Association, and Kevin Tibboel believe that the proposed facility would generate noise detrimental to the surrounding neighbors.

Response 27:

The TCEQ's jurisdiction is established by the Legislature and is limited to the issues set forth in statute. TCEQ rules do not set specific limits on the amount of noise generated by transfer station activities, vehicles, or equipment. However, a permit issued by the Commission "does not authorize any injury to persons or property or an invasion of other property rights, or any infringement of state or local law or regulations," in accordance with 30 TAC § 305.122(d). The Executive Director has reviewed the application and preliminarily determined that it satisfies the regulatory requirements regarding noise for the proposed facility.

By rule, waste acceptance hours are from 7:00 a.m. to 7:00 p.m., Monday through Friday, and operating hours are from 5:00 a.m. to 9:00 p.m., Monday through Friday; however, the rule notes that other hours may be approved. In Section 15 of Part IV of the Application, the Applicant has proposed waste acceptance hours from 5:00 a.m. to 6:00 p.m., Monday through Saturday, and operating hours from 4:00 a.m. to 7:00 p.m., Monday through Saturday.

Comment 28: Contaminated Water Management

Dave Bickley, Christopher Jeremy Brecheisen, James Brown, Tammy Colclasure, Sean Dawson, Armando Delecruz, Ethan Elmore, Mike Hale, Randy Harp, Kelly Kuehl, Jessie Moore, Jared Mumm, Brad Rabe, Karen Starks, and Lynn Sutherland were concerned about liquids released from the waste and how it would be managed.

Response 28:

The definition of contaminated water in 30 TAC § 330.3(36) includes any water that has contacted waste, therefore liquids from waste at the proposed facility would be contaminated water. Unpermitted discharge of contaminated water is prohibited under 30 TAC § 330.207(a).

Part III, Sections 2.3.3 and 4.2 clarify that contaminated water, including floor wash water, will be directed by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water dual-walled storage tank with an interstitial space for leak detection monitoring. The tank would hold somewhere between 500 and 2,000 gallons. A vacuum truck would remove the wastewater from the storage tank and transport it to an authorized facility.

Comment 29: Surface Water

Michelle Babb, Yumei Bao, Michael Beane, Jay Boshart, Amy Braley, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Steven Ford, Noah Garcia, David Alan Giles, Kelly Kuehl, Denise Morgan, Jared Mumm, Crystal Mumphrey, Nicholas Scott, Karen Starks, Elizabeth Tarrant, Reabeccah Tarrant, Kevin Tibboel, and Vickie Wood stated concerns that the proposed facility would adversely affect surface water in the vicinity.

Response 29:

The definition of contaminated water in 30 TAC § 330.3(36) includes any water that has contacted waste. Unpermitted discharge of contaminated water is prohibited under 30 TAC § 330.207(a). Part III, Sections 2.3.3 and 4.2 clarify that contaminated water, including floor wash water, will be directed by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water holding tank holding somewhere between 500 and 2,000 gallons. Design for this tank is shown on Detail 1 on Figure III-1.7 in Part III of the Application. A vacuum truck will remove the wastewater and transport it to an authorized facility. Properly managed contaminated water will not contaminate surface water.

Comment 30: Groundwater, Drinking Water, and Aquifer Protection

Christy Andrzejewski, Jimmy Babb, Travis Ball, Yumei Bao, Michele Benjamin, Jay Boshart, Amy Braley, Kathryn Brandt, Christopher Jeremy Brecheisen, Daniel Clark, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Ethan Elmore, Steven Ford, Stephen Gilcrest, Cathy Giles, David Alan Giles, Alicia Guerra, Tandy Hagar, Connie Hale, Mike Hale, Brett Harmon, Randy Harp, John Kirkpatrick, Kelly Kuehl, Mary Miller, Denise Morgan, Jared Mumm, Mark Rudin, Amanda Scott, Nicholas Scott, Alison Soeder, Karen Starks, Lynn Sutherland, Elizabeth Tarrant, Keith Tarrant, and Reabeccah Tarrant shared their concerns that the facility would adversely affect groundwater and drinking water. Similarly, Jimmy Babb wanted to know if regular water tests and surprise inspections will be performed by the TCEQ and what guarantees citizens have to ensure that water supply is not contaminated. David Alan Giles indicated that the TCEQ only cares about the Edwards Aquifer. Additionally, Daryl Wayne Freelen expressed concern that the proposed facility would cause contamination to his water supply line.

Similarly, Christopher Jeremy Brecheisen asked if the TCEQ can help the community perform baseline tests of area water wells to check for toxin levels prior to project start (maybe at least those within a mile of the project). Christopher Jeremy Brecheisen noted that many local residents including families rely on well water for drinking and bathing.

Response 30:

If the permit is issued, all waste will be unloaded onto a concrete floor. Liquids would drain to a sump and then to a dual-walled storage tank with an interstitial space for leak detection monitoring. Design for this tank is shown on Detail 1 on Figure III-1.7 in Part III of the Application. A more detailed discussion of contaminated water management is provided elsewhere in this RTC. The Executive Director has concluded that features to prevent contamination of groundwater have been addressed in the Application. Groundwater monitoring is not required for transfer stations under MSW rules.

Regular water tests for groundwater are not provided by the TCEQ. Regional offices perform inspections of regulated facilities and respond to all complaints from the public. While the Edwards Aquifer is specifically protected by the prohibition from landfills, all aquifers are

protected by the other rules in Chapter 330, including requirements for liner systems at landfills and contaminated water management.

If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

Comment 31: Two-sided Building Design and Tarp Covering Waste

Christopher Babb, Christopher Jeremy Brecheisen, James Brown, Sean Dawson, Connie Hale, Kelly Kuehl, Joan Lambert, and Jonathan Manning noted the two-sided building design and the use of tarps to cover waste at night and questioned the adequacy of these practices.

Response 31:

During the technical review of the application, the Applicant was asked how a two-sided building and covering waste with a tarp overnight would be adequate to address concerns for odor, health hazards, other nuisances, windblown waste, and noise and how visual screening would be provided. While an enclosed building is not required under MSW rules for this transfer station, the proposed design was changed to provide an enclosed building to address these concerns. The draft permit contains designs for an enclosed building. The Executive Director has reviewed the application and preliminarily determined that it satisfies the regulatory requirements regarding visual screening.

Comment 32: Incineration and Other Possible "Add Ons"

Christopher Jeremy Brechheisen asked about "add ons" that could become part of this facility's operation and whether incineration or open burning would be possible here.

Response 32:

The Application currently under consideration does not include incineration or waste burning in any form. Any incineration of waste is a new and different activity from the processing of waste and would require an amendment or new permit.

Certain changes may be made to a permit after a permit is issued. These changes must meet all applicable rules and provisions of the existing permit. For changes that do not reduce the protectiveness of existing provisions, changes can be made through modification (with or without public notice, depending on the change) or through amendment (for example, in the case of an expansion of the facility boundary, an increase in the daily maximum limit of waste acceptance, or an expansion of operating hours). Amendments are essentially new permit application, with a completely new technical review, new opportunities for public meetings and public hearings, and requirements for public notice.

Comment 33: No Citizen's Collection Station (CCS)

Christopher Jeremy Brecheisen indicated that the facility has no CCS.

Response 33:

MSW rules do not require CCSs at transfer stations. CCSs are typically found as stand-alone collection points for individuals for whom no trash collection is provided, or at landfills to allow citizens to unload waste away from the active face, but in no situation is it required.

Comment 34: Adequacy of Concrete Tipping Floor to Protect Against Leaks

Denise Morgan was concerned that the concrete tipping floor would be inadequate to protect against leaks.

Response 34:

MSW rules do not specify the material for transfer station tipping floors; however, units must be designed to control spills and contaminated water from leaving the facility, which includes percolation through the foundation. Concrete foundations are used in most transfer stations for structural reliability and for impermeability. Furthermore, as discussed elsewhere, the tipping floor at this facility is designed to direct liquids to a sump and storage tank, not to store these liquids. This minimizes the depth of the contaminated water, and therefore the pressure of contaminated water on the foundation and reduces the likelihood of transmission through the foundation.

Comment 35: Odor, Dust, Vapors, Methane, and Effect on Air Quality

Janet Anderson, Christy Andrzejewski, Christopher Babb, Travis Ball, Yumei Bao, Dave Bickley, Kathryn Brandt, Christopher Jeremy Brecheisen, James Brown, Ashley Bryan, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Amanda Delisle, Daryl Wayne Freelen, Stephen Gilcrest, David Alan Giles, Raymond Green, Bunny Harmon, Randy Harp, Richard Helge, Kelly Kuehl, Jonathan Manning, Barba McCord, Dustin McNeese, Mary Miller, Jessie Moore, Denise Morgan, Jared Mumm, Crystal Mumphrey, Jillian Nichols, Kayla Price, Mark Rudin, Amanda Scott, Nicholas Scott, Alison Soeder, Wendy Speight, Daniel Starks, Janis Stroope, Lynn Sutherland, Texas A&M University-Commerce, Elizabeth Tarrant, Keith Tarrant, Reabeccah Tarrant, Kevin Tibboel, and Cyrus Vaughan raised concerns about air quality, including odor, dust, vapor, and methane.

Response 35:

Air pollution control is required by 30 TAC § 330.245. The specific air pollution control proposed by the Applicant is in Section 23 of Part IV in the Application. The Application indicates that, if the permit is granted, a minimum 50-foot buffer zone would be maintained and no waste loading, unloading, or processing would occur outside the building. Liquid and solid waste would be stored in odor-retaining containers and vessels. The tipping floor would be washed routinely. Ponding of water would not be allowed, including wash waters. If waste is stored overnight, it would be within the enclosed building.

Section 23 of the Application indicates that dust that may occur within the building will be controlled, as needed, by water sprays, mist systems, or similar methods. Roads will be asphalt or concrete, as shown on Figure III-1.3 in Part III of the Application.

Section 23 of the Application also indicates that air emissions would be controlled in accordance with current air permitting requirements and that appropriate authorizations under Chapter 116 or Chapter 330, Subchapter U would be obtained prior to operation.

Individuals are encouraged to report nuisance odors to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

Comment 36: Odor Control Chemicals

Kathryn Brandt was concerned about what odor-control chemicals would be used at the proposed facility.

Response 36:

Section 23 of Part IV of the Application refers to a possible deodorizing system that could be utilized, if necessary. MSW rules require the applicant to describe any systems that will be utilized to control odors, but specific design information or material safety data sheets are not required as part of the application. Individuals are encouraged to report nuisance odors to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

Comment 37: Vectors

Billy Rhea Beane, Dave Bickley, Kathryn Brandt, Noah Garcia, David Alan Giles, Kelly Kuehl, Jonathan Manning, Jared Mumm, and Lynn Sutherland stated that the transfer station would attract vectors, including rummaging animals.

Response 37:

TCEQ's rules define a vector as an agent, such as an insect, snake, rodent, bird, or animal capable of mechanically or biologically transferring a pathogen from one organism to another. 30 TAC § 330.3(175). The breeding of vectors is a nuisance under 30 TAC § 330.3(97). The creation and maintenance of a nuisance is prohibited under 30 TAC § 330.15(a)(2).

As described in Part III, Section 2.3.2 of the Application, if the permit is issued, waste processing will occur within the transfer station on a concrete floor within a four-sided building with doors to enclose stored waste outside of processing hours. The concrete tipping floor will be washed down weekly, as required by 30 TAC § 30.243(a). Part III, Sections 2.3.3 and 4.2 of the Application clarify that contaminated water, including floor wash water, will be directed by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water dual-walled storage tank with an interstitial space for leak detection monitoring. The Executive Director has reviewed the application and preliminary determined that is satisfies the regulatory requirement regarding vector control. Individuals are encouraged to report nuisance conditions to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

Comment 38: Windblown Waste and Waste on Roads

Travis Ball, Dave Bickley, Kathryn Brandt, James Brown, Ted Ray Crim, Sean Dawson, Armando Delacruz, Daryl Wayne Freelen, Diana Fults, David Alan Giles, Randy Harp, Jonathan Manning, Crystal Mumphrey, Mark Rudin, and Jill Wickersham were concerned about windblown waste. Travis Ball, Jeffrey Cross, Sean Dawson, Randy Harp, Jessie Moore, Nicholas Scott, Janis Stroope, Texas A&M University-Commerce, Reabeccah Tarrant, and Jill Wickersham indicated that there would be trash along the roads if the facility is authorized. Similarly, Nicholas Scott asked for details on how provisions for cleanup of waste along roadways would be enforced and what fines would be assessed.

Response 38:

The facility is responsible for picking up litter scattered throughout the site, along fences and access roads, at the gate, and along and within the right-of-way of public access roads serving the facility for two miles from the entrance (including any waste illegally dumped within the right-of-way). The litter must be collected at least once a day on the days that the facility is in operation as specified in 30 TAC § 330.233 and 30 TAC § 330.235. Additionally, in accordance with 30 TAC § 330.235, the Applicant must take steps to encourage vehicles hauling waste to the facility to be enclosed or provided with a tarpaulin, net, or other means to effectively secure the load to prevent the escape of any part of the load by blowing or spilling. Sections 17 and 18 of Part IV of the Application address these requirements.

The Executive Director has reviewed the application and preliminarily determined that it satisfies the regulator requirements regarding windblown waste and litter. Individuals are encouraged to report nuisance conditions to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

Comment 39: Operating Hours

Kathryn Brandt and Jared Mumm indicated that proposed operating hours are excessive.

Response 39:

In accordance with 30 TAC § 330.229(a), an application must include waste acceptance hours and operating hours for when the facility will transport materials on or off-site, as well as the hours for when a facility will operate heavy equipment. By rule, waste acceptance hours are from 7:00 a.m. to 7:00 p.m., Monday through Friday, and operating hours are from 5:00 a.m. to 9:00 p.m., Monday through Friday; however, the rule notes that other hours may be approved.

In Section 15 of Part IV of the Application, the Applicant has proposed waste acceptance hours from 5:00 a.m. to 6:00 p.m., Monday through Saturday, and operating hours from 4:00 a.m. to 7:00 p.m., Monday through Saturday. The Executive Director has received no information to justify restricting these proposed operating hours. If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

Comment 40: Fire, Firefighting Activities, and Volunteer Fire Department

Travis Ball, Dave Bickley, Kathryn Brandt, David Alan Giles, Randy Harp, Bobby Stovall, and Lynn Sutherland shared a concern for fires, particularly in consideration of a volunteer fire department that serves the community where the facility is proposed. Dave Bickley asked about runoff and emissions relating to fire fighting. Kathryn Brandt asked who would supply water at the facility and whether there would be an adequate supply.

Response 40:

A Fire Protection Plan, as required under 30 TAC § 330.221(c), is provided in Section 11 of Part IV of the Application. The facility will have a water tank and a 100 gallon per minute pump to ensure that water will reach all parts of the tipping floor. The final sizing of the water tank will be determined after contacting the local fire marshal and in accordance with local fire codes at the time of construction. The facility must also meet any additional local fire codes. MSW rules do not require an application to provide the source of water for a proposed facility.

Comment 41: Dumping Outside Transfer Building

Christopher Jeremy Brecheisen is concerned that waste dumping will occur outside the transfer building.

Response 41:

Section 23 of Part IV of the Application states that no waste loading, unloading, or processing may occur outside the building. Additionally, the Draft Permit does not authorize outdoor waste storage or processing, other than a wastewater storage tank. The Draft Permit does not authorize any disposal of waste.

Comment 42: Visual Damage to Community

Jillian Nichols and James Wickersham indicated that the proposed facility would visually ruin the community.

Response 42:

Section 20 of Part IV of the Application indicates that waste processing operations will be conducted within the transfer station building to minimize adverse visual impacts.

Comment 43: 72-hour Waste Storage

Travis Ball indicated that allowing 72-hour storage of waste is excessive.

Response 43:

The MSW rules do not limit waste storage time at this type of transfer stations but provide that these types of activities must not lead to nuisances, such as odor, vectors, or windblown waste. Parts I/II, Section 2.2.4 of the Application indicate that solid waste will generally be processed within 4 to 6 hours on average, but that maximum holding times on holidays or in the event of equipment breakdown will not exceed 72 hours. If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

Comment 44: Permits for Facilities Violating Other Laws or Regulations

Christopher Jeremy Brecheisen asked what happens if TCEQ issues a permit for a facility that violates other state departments or agency laws, regulations or ordinances.

Response 44:

An MSW authorization does not exempt authorized facilities from other requirements under other jurisdictions. This is noted in Provision VIII.A of the Draft Permit, which states "the permittee shall comply with all applicable federal, state, and local regulations and shall obtain any and all other required permits prior to the beginning of any on-site improvements or construction approved by this permit." Violations of requirements outside of Chapter 330, which regulates MSW facilities, would be enforced by the corresponding agency with jurisdiction.

Comment 45: Communities Served

Teresa Crow asked what counties the proposed facility would serve. Travis Ball, Ted Ray Crim, Jeffery Cross, Sean Dawson, and James Hudson noted that waste would be accepted from outside of Hunt County. Travis Ball indicated that the facility was too large for the community in which it would be located and so would be receiving waste from outside Hunt County.

Response 45:

Parts I/II, Section 2.2.1 of the Application indicates that the facility will primarily serve Hunt County and surrounding communities. Subparagraph 30 TAC § 330.61(b)(1)(A) requires a brief description of the general sources and generation areas contributing waste to a proposed facility. The rules regulating transfer stations do not limit transfer stations to accept waste from only the county where the facility is located.

Comment 46: Collection of Baseline Data

Christopher Jeremy Brecheisen asked if TCEQ ever assisted a community with a pre-project request such as gathering environmental baseline data, and if so, would the TCEQ provide examples.

Response 46:

The TCEQ has several programs where the Executive Director partners with organizations and citizens to increase the public's knowledge of water quality and nonpoint source pollution across the state (https://www.tceq.texas.gov/waterquality/nonpoint-source/projects/texas-stream-team). Additionally, 30 TAC § 70.4 provides a mechanism for private individuals to demonstrate possible violations of the law within the commission's jurisdiction. However, the rules regulating transfer stations to not include a mechanism for the Executive Director to assist in pre-project data gathering.

Comment 47: Individual Rights and Group Rights

Christopher Jeremy Brecheisen noted that approval of the Draft Permit will imply the TCEQ is willing to grant the request of a single Texan, despite opposition and over the quantifiable best interests of hundreds and possibly thousands of Texans.

Response 47:

The Texas Solid Waste Disposal Act (TSWDA) in Chapter 361 of the Texas Health and Safety Code (THSC) and 30 TAC Chapter 330 were promulgated to protect human health and the environment. The role of the TCEQ is to ensure that authorized facilities are designed, constructed, and operated according to applicable rules that protect human health and the environment.

The Executive Director has reviewed the application and preliminarily determined that the facility, operated according to the permit provisions, the TSWDA, and 30 TAC Chapter 330, would adequately protect human health and the environment and prevent adverse health and environmental impacts.

Changes Made to the Draft Permit in Response to Comments

The Application and Draft Permit comply with all applicable regulatory and statutory permitting requirements. No changes were made to the Draft Permit in response to comments received.

Respectfully submitted,

Texas Commission on Environmental Quality

Toby Baker
Executive Director

Erin Chancellor, Director
Office of Legal Services

Charmaine Backens, Deputy Director
Environmental Law



Kathy Humphreys, Staff Attorney
Environmental Law Division
State Bar No. 24046858
P.O. Box 13087, MC 173
Austin, TX 78711-3087
512-239-1939

REPRESENTING THE EXECUTIVE DIRECTOR
OF THE TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on August 12, 2022, that the "Executive Director's Response to Comments" for New Municipal Solid Waste Permit No. 2411 for the Highway 24 Transfer Station was filed with the TCEQ's Office of the Chief Clerk.

Kathy Humphreys

ATTACHMENT A

All commenters

Amanda Adams
Robin Alexander
Janet Gayle Anderson
Christy Andrzejewski
Christopher James Babb
Jimmy Babb
Michelle Babb
Travis Ball
Yumei Bao
Billy Rhea Beane
Cathy Beane
Michael Beane
Michele Benjamin
Dave Bickley
Janice Bickley
Tami R Bishop
Cinda Boshart
Jay Boshart
Aden Boyer
Amy Braley
Kathryn Brandt
Christopher Jeremy Brecheisen
James Brown
Ashley Bryan
Karla Burke
Cathy Certain
Courtney Clanton
Daniel A Clark
Brenda Michelle Contreras
Ted Ray Crim
Jeffrey W Cross
Teresa Kay Crow
Bickley Dave
Sean Dawson
Armando Delacruz
Amanda Delisle
Patrick Etie
Sharon Fisher
Cole R Fleming
Steven Ford
Lory Lee Foster
Daryl Wayne Freelen
Cassie Fritzky
Diana Fults
Jon Funderburk
Noah Garcia
Stephen Gilcrest
Cathy Giles
David Alan Giles
Jessica N Gossett
Raymond Green
Alicia Guerra
Tandy Hagar
Connie Hale
Mike W Hale
Karen Marie Hammons
Karen B Hardin
Brett W Harmon
Bunny Harmon
Randy Harp
Steven M Harrison
Richard A Helge
Cody Helm
Sarah Helm
Michael Hoffmann
James H Hudson
Renee Humphries
Autumn Johnson
John Kirkpatrick
Katharine Knoodle
Anna Knutson
Kelly Kuehl
Joan Lambert
Leslee Lay
Alyssa C Logston
Susan Lousberg
Jonathan Manning
Ronald Manning
Barba Lane Mccord
Tina Mccord
Joe Mccracken
Vickie Mcmurray
Dustin Mcneese
Liz Medina
Mary Miller
Vickie Mize
Jessie Moore
Denise Morgan
Chelsea Morse
Jared Mumm
Crystal Mumphrey
Jillian Nichols
Adriannia Palmer
Kayla Price
Brad Rabe
Cynthia Ross
Mark Rudin
Tim Schauer
Amanda Scott
Nicholas Scott
Bryan Slaton
Roy Lee Smalley
Allison Soeder
Wendy M Speight
Michael Stark
Daniel Starks
Karen Starks
Leanne Stevens
Bobby W Stovall
Janis Stroope
Lynn C Sutherland
Robert Angus Sutherland
Colclasure Tammy
Elizabeth Raylynn Tarrant
Keith R Tarrant
Reabeccah L Tarrant
Kristi M Taylor
Kevin Tibboel
Mickey J Trusty
Cyrus Vaughan
Ashley Whitmore
James Wickersham
Jill Wickersham
Echo Wofford
Vickie Wood
Joe Zhao

MAILING LIST
for
Highway 24 Transfer Station
MSW Permit No. 2411

FOR THE APPLICANT:

Josh Bray, President
Transfer Station Solutions, LLC
P.O. Box 6427
Paris, Texas 75461

Kevin Yard, P.E.
SCS Engineers
1901 Central Drive, Suite 550
Bedford, Texas 76021

Ryan Kuntz, P.E.
SCS Engineers
1901 Central Drive, Suite 550
Bedford, Texas 76021

INTERESTED PERSONS:

See attached mailing list

FOR THE EXECUTIVE DIRECTOR
via electronic mail:

Ryan Vise, Deputy Director
Texas Commission on Environmental Quality
External Relations Division
Public Education Program MC-108
P.O. Box 13087
Austin, Texas 78711-3087

Kathy Humphreys, Staff Attorney
Texas Commission on Environmental Quality
Environmental Law Division MC-173
P.O. Box 13087
Austin, Texas 78711-3087

Steve Odil, Technical Staff
Texas Commission on Environmental Quality
Waste Permits Division
MSW Permits Section MC-124
P.O. Box 13087
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL
via electronic mail:

Vic McWherter, Attorney
Texas Commission on Environmental Quality
Public Interest Counsel MC-103
P.O. Box 13087
Austin, Texas 78711-3087

FOR THE CHIEF CLERK
via electronic mail:

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

ADAMS , AMANDA
5645 E INTERSTATE 30
CAMPBELL TX 75422-2747

ALEXANDER , MRS ROBIN
CYPRESS BANK
1702 LIVE OAK ST
COMMERCE TX 75428-2552

ANDERSON , JANET GAYLE
5993 SAND HILLS DR
CAMPBELL TX 75422-1841

ANDRZEJEWSKI , CHRISTY
1042 COUNTY ROAD 4109
GREENVILLE TX 75401-1103

BABB , CHRISTOPHER JAMES
2004 STATE HIGHWAY 24
CAMPBELL TX 75422-1315

BABB , JIMMY
1441 COUNTY ROAD 4208
CAMPBELL TX 75422-1763

BABB , KASEY
1567 COUNTY ROAD 4208
CAMPBELL TX 75422-1765

BABB , MICHELLE
PO BOX 178
CAMPBELL TX 75422-0178

BALL , TRAVIS
TEXAS A&M UNIVERSITY COMMERCE
PO BOX 3011
COMMERCE TX 75429-3011

BAO , YUMEI
1369 BRIDLE BLVD
FRISCO TX 75036-4572

BEANE , BILLY RHEA
2635 COUNTY ROAD 4312
CAMPBELL TX 75422-2201

BEANE , CATHY
2635 COUNTY ROAD 4312
CAMPBELL TX 75422-2201

BEANE , MICHAEL
2553 COUNTY ROAD 4312
CAMPBELL TX 75422-2308

BENJAMIN , MICHELE
5861 COUNTY ROAD 4209
CAMPBELL TX 75422-1787

BICKLEY , DAVE
5487 LOOP 178
COMMERCE TX 75428-6451

BICKLEY , JANICE
5487 LOOP 178
COMMERCE TX 75428-6451

BISHOP , TAMI R
TEXAS A&M COMMERCE
6916 SILVER OAK CT
MCKINNEY TX 75072-5015

BOSHART , CINDA
612 COUNTY ROAD 3101
GREENVILLE TX 75402-8810

BOSHART , JAY
612 COUNTY ROAD 3101
GREENVILLE TX 75402-8810

BOYER , MR ADEN
TAMU COMMERCE
1490 WINDING LN
GREENVILLE TX 75402-9134

BRALEY , AMY
TEXAS A&M UNIVERSITY COMMERCE
PO BOX 3011
COMMERCE TX 75429-3011

BRANDT , MS KATHRYN
5829 PRIVATE ROAD 4223
CAMPBELL TX 75422-1827

BRECHEISEN , CHRISTOPHER JEREMY
BRECHEISEN FARM
1686 COUNTY ROAD 4208
CAMPBELL TX 75422-1766

BROWN , JAMES
2585 COUNTY ROAD 4312
CAMPBELL TX 75422-2308

BRYAN , ASHLEY
8880 STATE HIGHWAY 11 E
COMMERCE TX 75428-5202

BURKE , MRS KARLA
NO 177
1414 COUNTY ROAD 4216
CAMPBELL TX 75422

CERTAIN , CATHY
PO BOX 96
CAMPBELL TX 75422-0096

CLANTON , COURTNEY
TEXAS A&M UNIVERSITY COMMERCE
STE 173 LIBRARY
2600 W NEAL ST
COMMERCE TX 75428-4311

CLARK , MR DANIEL A
2479 COUNTY ROAD 4312
CAMPBELL TX 75422-2210

CONTRERAS , BRENDA MICHELLE
1110 S PATTERSON ST
CAMPBELL TX 75422-2805

COUNTIS , AMBER W
2721 TANGLEWOOD DR
COMMERCE TX 75428-3809

CRIM , MR TED RAY
2313 NEWCASTLE CIR
PLANO TX 75075-3328

CROSS , JEFFREY W
3870 WILDWOOD DR
CAMPBELL TX 75422-1844

CROW , TERESA KAY
5676 COUNTY ROAD 4120
CAMPBELL TX 75422-1724

DAVE , BICKLEY
5487 LOOP 178
COMMERCE TX 75428-6451

DAWSON , SEAN
5808 COUNTY ROAD 4209
CAMPBELL TX 75422-1786

DELACRUZ , ARMANDO
5657 COUNTY ROAD 4317
CAMPBELL TX 75422-1863

DELISLE , DR. AMANDA
TEXAS A&M UNIVERSITY COMMERCE
2628 CHARITY RD
COMMERCE TX 75428-3931

DICKEN , JEREMY
3961 FM 1568
CAMPBELL TX 75422-2255

ELMORE , ETHAN SHAWN
5787 COUNTY ROAD 4209
CAMPBELL TX 75422-1785

ETIE , PATRICK
2013 COUNTY ROAD 4312
CAMPBELL TX 75422-2211

FISHER , SHARON
1804 MORSE ST
COMMERCE TX 75428-3152

FLEMING , COLE R
6230 TAYLOR RD
KAUFMAN TX 75142-4844

FORD , STEVEN
3505 FM 499
GREENVILLE TX 75401-6038

FOSTER , LORY LEE
3894 FOSTER DR
CAMPBELL TX 75422-3332

FREELEN , MR DARYL WAYNE
5710 COUNTY ROAD 4317
CAMPBELL TX 75422-1859

FRITZKY , CASSIE
712 S PATTERSON ST
CAMPBELL TX 75422-2851

FULTS , MRS DIANA
527 TURTLE CREEK DR
GREENVILLE TX 75402-4330

FUNDERBURK , JON
3012 WOODGLEN DR
COMMERCE TX 75428-6110

GARCIA , MR NOAH
604 1ST ST
TERRELL TX 75160-2002

GARRETT , MICHAEL
4274 FM 1568
CAMPBELL TX 75422-2260

GILCREST , STEPHEN
447 FM 513 S
CAMPBELL TX 75422-5198

GILES , MRS CATHY
PO BOX 58
CAMPBELL TX 75422-0058

GILES , DAVID ALAN
PO BOX 58
CAMPBELL TX 75422-0058

GILES , DAVID ALAN
3714 STATE HIGHWAY 24
CAMPBELL TX 75422-1294

GOSSETT , JESSICA N
4071 FM 1568
CAMPBELL TX 75422-2257

GREEN , RAYMOND
3775 WILDWOOD DR
CAMPBELL TX 75422-1843

GUERRA , ALICIA
4626 COUNTY ROAD 4206
CAMPBELL TX 75422-1246

HAGAR , TANDY
4648 COUNTY ROAD 3111
CAMPBELL TX 75422-3208

HALE , MRS CONNIE
8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

HALE , DAVID
2706 TANGLEWOOD DR
COMMERCE TX 75428-3810

HALE , MR MIKE W
8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

HALL , JOHN
3307 STATE HIGHWAY 24
CAMPBELL TX 75422-1348

HALL , TIM
3305 STATE HIGHWAY 24
CAMPBELL TX 75422-1348

HAMMONS , KAREN MARIE
501 PARK ST
COMMERCE TX 75428-2117

HARDIN , KAREN B
TEXAS PARKS & WILDLIFE DEPARTMENT
4200 SMITH SCHOOL RD
AUSTIN TX 78744-3218

HARMON , BRETT W
5859 COUNTY ROAD 4209
CAMPBELL TX 75422-1787

HARMON , BUNNY
5859 COUNTY ROAD 4209
CAMPBELL TX 75422-1787

HARP , DR. RANDY
TEXAS A&M COMMERCE
PO BOX 3011
COMMERCE TX 75429-3011

HARP , DR. RANDY
64 DOLLY RD
SULPHUR SPRINGS TX 75482-6978

HARRISON , STEVEN M
HUNT COUNTY - COUNTY COMMISSIONER PCT 4
RM 107
2507 LEE ST
GREENVILLE TX 75401-4245

HASLETT , MARK
PO BOX 4504
COMMERCE TX 75429-4504

HELGE , RICHARD A
TEXAS A&M UNIVERSITY - COMMERCE
1610 SYCAMORE ST
COMMERCE TX 75428-2576

HELM , CODY
958 STATE HIGHWAY 24
CAMPBELL TX 75422-1338

HELM , SARAH
958 STATE HIGHWAY 24
CAMPBELL TX 75422-1338

HOFFMANN , MICHAEL
PO BOX 71
CAMPBELL TX 75422-0071

HUDSON , JAMES H
TURTLE CREEK INVESTMENTS
APT 804
3225 TURTLE CREEK BLVD
DALLAS TX 75219-5409

HUGHEY , GAYLORD
305 FERRELL PL
TYLER TX 75702-7109

HUMPHRIES , MRS RENEE
1820 PRIVATE ROAD 4225
CAMPBELL TX 75422-1838

JOHNSON , AUTUMN
3201 OVERLOOK DR
ROYSE CITY TX 75189-5171

KIRKPATRICK III , MR JOHN
2066 FM 3218
CAMPBELL TX 75422-2272

KNOODLE , KATHARINE
858 COUNTY ROAD 3101
GREENVILLE TX 75402-8814

KNUTSON , ANNA
1505 DEER TRL
COMMERCE TX 75428-3865

KUEHL , KELLY
5915 COUNTY ROAD 4710
COMMERCE TX 75428-5941

LAMBERT , JOAN
2013 COUNTY ROAD 4312
CAMPBELL TX 75422-2211

LAY , MRS LESLEE
A PC GEEK
2608 TAYLOR ST
COMMERCE TX 75428-3818

LOGSTON , ALYSSA C
1863 COUNTY ROAD 4109
CAMPBELL TX 75422-1207

LOUSBERG , SUSAN
414 COUNTY ROAD 4560
MOUNT PLEASANT TX 75455-8551

MANNING , DR. JONATHAN
HUNT COUNTY ANIMAL HOSPITAL
3440 STATE HIGHWAY 24
CAMPBELL TX 75422-1290

MANNING , RONALD
BEDROCK LLC
633 YELLOW BRIDGE RD
VAN ALSTYNE TX 75495-3927

MCCORD , BARBA LANE
5956 PRIVATE ROAD 4223
CAMPBELL TX 75422-1828

MCCORD , TINA
4422 COUNTY ROAD 2301
SULPHUR SPRINGS TX 75482-7836

MCCRACKEN , JOE
1205 NORTHWOOD CT
COMMERCE TX 75428-2000

MCMURRAY , VICKIE
1527 DEER TRL
COMMERCE TX 75428-3865

MCNEESE , DUSTIN
4200 TEMPLETON ST
GREENVILLE TX 75401-4918

MEDINA , LIZ
7070 STATE HIGHWAY 24
COMMERCE TX 75428-5820

MILLER , MARY
1712 COUNTY ROAD 4210
CAMPBELL TX 75422-1812

MIZE , MRS VICKIE
1780 COUNTY ROAD 4109
CAMPBELL TX 75422-1204

MOORE , JESSIE
4635 FM 2736
CAMPBELL TX 75422-1273

MORGAN , DENISE
409 N PATTERSON ST
CAMPBELL TX 75422-2869

MORGAN , DENISE
3228 COUNTY ROAD 4403
COMMERCE TX 75428-6406

MORSE , CHELSEA
1505 ARP ST
COMMERCE TX 75428-2509

MUMM , JARED
1717 DIVISION ST
COMMERCE TX 75428-3127

MUMPHREY , CRYSTAL
4923 FM 2736
CAMPBELL TX 75422-1279

NICHOLS , JILLIAN
PO BOX 8
CAMPBELL TX 75422-0008

PALMER , ADRIANNIA
5658 COUNTY ROAD 3204
CAMPBELL TX 75422-5122

PRICE , DR. KAYLA
2001 HOUSTON ST
SULPHUR SPRINGS TX 75482-5903

RABE , BRAD
4076 MEADOWVIEW DR
CAMPBELL TX 75422-1872

ROBINSON , JARED
2634 STATE HIGHWAY 24
CAMPBELL TX 75422-1310

ROSS , DR. CYNTHIA
2625 STERLING HART DR
COMMERCE TX 75428-3921

RUDIN , MARK
TEXAS A&M UNIVERSITY COMMERCE
PO BOX 3011
COMMERCE TX 75429-3011

RUDIN , MARK
1701 EDUCATION DR
COMMERCE TX 75428

SCHAUER , TIM
225 PROVIDENCE DR
VAN ALSTYNE TX 75495-2862

SCOTT , MRS AMANDA
TEXAS A&M UNIVERSITY COMMERCE
204 BROOKHAVEN TER
COMMERCE TX 75428-2002

SCOTT , NICHOLAS
APT C5
2309 WASHINGTON ST
COMMERCE TX 75428-3582

SHARPE , BRAD
5102 WHISTLING STRAITS DR
COLLEGE STATION TX 77845-3789

SLATON , THE HONORABLE BRYAN STATE REPRESENTATIVE
TEXAS HOUSE OF REPRESENTATIVES DISTRICT 2
PO BOX 2910
AUSTIN TX 78768-2910

SLATON , THE HONORABLE BRYAN STATE REPRESENTATIVE
TEXAS HOUSE OF REPRESENTATIVES DISTRICT 2
1213 CEDAR COVE PL
ROYSE CITY TX 75189-8129

SMALLEY , ROY LEE
2324 HIGHWAY 24
CAMPBELL TX 75422

SOEDER , ALLISON
137 MOCKINGBIRD WAY
CADDO MILLS TX 75135-6479

SPEIGHT , WENDY M
PO BOX 779
COMMERCE TX 75429-0779

STARK , MR MICHAEL
2804 MCCARLEY DR
COMMERCE TX 75428-3830

STARKS , DANIEL
1215 1/2 WASHINGTON ST
COMMERCE TX 75428-2613

STARKS , KAREN
2012 CREEKVIEW DR
COMMERCE TX 75428-3947

STEVENS , LEANNE
5844 COUNTY ROAD 3204
CAMPBELL TX 75422-5126

STEWART , NEAL
4120 FM 1568
CAMPBELL TX 75422-2258

STOVALL , BOBBY W
HUNT COUNTY
PO BOX 1097
GREENVILLE TX 75403-1097

STROOPE , MRS JANIS
2215 COUNTY ROAD 4208
CAMPBELL TX 75422-1775

SUAZO , MIGUEL
310 ASHBURN CV
AUSTIN TX 78738-1819

SUTHERLAND , MRS LYNN C
1507 S PATTERSON ST
CAMPBELL TX 75422-2810

SUTHERLAND , MR ROBERT ANGUS
1507 S PATTERSON ST
CAMPBELL TX 75422-2810

TAMMY , COLCLASURE
170 COUNTY ROAD 4624
COOPER TX 75432-6425

TARRANT , MS ELIZABETH RAYLYNN
2006 FM 3218
CAMPBELL TX 75422-2272

TARRANT , KEITH R
2006 FM 3218
CAMPBELL TX 75422-2272

TARRANT , MS REABECCAH L
2006 FM 3218
CAMPBELL TX 75422-2272

TAYLOR , MISS KRISTI M
TEXAS A&M UNIVERSITY COMMERCE
1508 CADDO ST
COMMERCE TX 75428-2542

TIBBOEL , KEVIN
4040 MEADOWVIEW DR
CAMPBELL TX 75422-1872

TRUSTY , MICKEY J
THE TRUSTY LAW FIRM
412 PIPELINE RD
SULPHUR SPRINGS TX 75482-2080

TRUSTY , MICKEY J
THE TRUSTY LAW FIRM
PO BOX 1099
SULPHUR SPRINGS TX 75483-1099

VAUGHAN , MS CYRUS
UNIT 1
711 S HOUSTON ST
WOLFE CITY TX 75496-3582

VOSS , PAUL
5615 COUNTY ROAD 4704
COMMERCE TX 75428-5569

WHITMORE , MS ASHLEY
5657 COUNTY ROAD 4317
CAMPBELL TX 75422-1863

WICKERSHAM , JAMES
709 STATE HIGHWAY 24
CAMPBELL TX 75422-1343

WICKERSHAM , JILL
PO BOX 8
CAMPBELL TX 75422-0008

WOFFORD , ECHO
ECHOES
1415 PARK ST
COMMERCE TX 75428-3051

WOOD , VICKIE
1611 PARK ST
COMMERCE TX 75428-3053

ZHAO , JOE
357 COUNTY ROAD 3101
GREENVILLE TX 75402-8803

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Monday, June 6, 2022 9:14 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

H

From: cbreche@yahoo.com <cbreche@yahoo.com>
Sent: Saturday, June 4, 2022 10:57 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christopher Jeremy Brecheisen

EMAIL: cbreche@yahoo.com

COMPANY: Brecheisen Farm

ADDRESS: 1686 COUNTY ROAD 4208
CAMPBELL TX 75422-1766

PHONE: 9035136875

FAX:

COMMENTS: I respectfully request a contested administrative hearing. At the recent public meeting for this permit application, TCEQ stated (amazingly) that they've approved 100% of all solid waste permit applications over at least the past 20+ years (maybe even longer). TCEQ also acknowledged that if other permit applications were filed for our area in the future, in addition to this transfer station, the two existing giant sandpits and the two existing landfills in our area (one active and one in closed status), that they would not take any of those other property value destroying projects

into consideration and would simply approve any new applications at the same rate they've approved other projects (i.e., 100%). Something is very wrong with a process that always (100% of the time) favors monied interests over the rights and interests of ordinary hard-working Texans. It's almost as if TCEQ exists solely to provide some top cover and a perception that Texans have a say on harmful projects proposed in their already established communities. It appears to many in our community that we do not, and that this whole public comment/meeting process is simply for show, IF, as it appears, this permit had a 100% chance of success the moment it was submitted in the system. Nearly all of the existing 196 transfer stations in Texas appear to be in either industrial zoned areas, or at least further away from residences than this planned project. People are losing faith in their governmental agencies nationwide and are coming to the conclusion that the fix is in and that the game is rigged. Even being an eternal optimist, it's getting harder and harder to argue against that pessimistic view. I understand that these types of permitting processes used to work their way thru the courts, and that commissions such as TCEQ only came about to help lessen the case burdens in the court system. If TCEQ, in their own acknowledgement, ONLY looks at whether boxes are checked on an application, and not does not (whether unwilling or unable) look at individual cases holistically to see how communities are impacted, then the TCEQ commission project is clearly a failure and should be replaced with more capable and qualified individuals, such has district judges in courts to fill this crucial responsibility that is currently being neglected. TCEQ are not elected and are not accountable to Texans, even though we pay their salaries. Judges appear to be better positioned to weigh the facts of a given situation and make decisions that aren't already pre-determined (100%) to go against communities. Judges are also typically members of the same general communities that many of these property value destroying and safety hazard projects are planned for. TCEQ should be allowed to sunset on schedule during the next legislative session. These types of important decisions are too important to Texas communities to be rubber stamped at 100% approval rates, especially when considering that those with those wielding the rubber stamps have no actual accountability to the communities affected.

MSW
125147

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Monday, September 26, 2022 7:37 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: TAMU-Commerce Response to Executive Director's Response to Public Comments-Permit 2411.pdf

RFR
H

From: bsharpe@tamus.edu <bsharpe@tamus.edu>
Sent: Friday, September 23, 2022 2:37 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Brad Sharpe

EMAIL: bsharpe@tamus.edu

COMPANY: Texas A&M University System

ADDRESS: 301 TARROW ST 6th Floor
COLLEGE STATION TX 77840-7896

PHONE: 9794586145

FAX:

COMMENTS: Please see attached Response Letter from Texas A&M University- Commerce.

September 23, 2022

Laurie Gharis
Chief Clerk
TCEQ, MC-105
P.O. Box 13087
Austin, TX 78711

RE: Request for Reconsideration and a Contested Case Hearing
Highway 24 Transfer Station
Applicant: Transfer Station Solutions, LLC
MSW Permit No. 2411

Dear Chief Clerk Gharis:

Texas A&M University-Commerce ("TAMUC") writes to request reconsideration by the Texas Commission on Environmental Quality ("TCEQ") and a Contested Case Hearing on the above-referenced application. TAMUC disagrees with the decision rendered by TCEQ's Executive Director ("ED") and his Response to Public Comment ("RTC") filed on August 24, 2022, regarding Permit No. 2411. As TAMUC explained in its public comments, TAMUC is an "affected person"[1] as defined under TCEQ's rules, respectfully requests reconsideration of the ED's decision,[2] and requests a hearing on the merits so that it may present facts and evidence in support of its opposition to the application submitted to TCEQ by Transfer Station Solutions, LLC.[3] TAMUC also provides its request for reconsideration of the ED's recommendation and corresponding responses to the ED's RTC below. TAMUC has repeatedly expressed its opposition to the proposed transfer station and provides its prior written communications to the Commission as **Attachments A & B,** hereto which are incorporated herein by reference and are the basis for TAMUC's hearing request.

I. Request for Reconsideration of Executive Director's Decision

TAMUC has reviewed the ED's decision, disputes that decision, and requests reconsideration[4] of that decision on the following grounds:

1. **Comment 1: Location of Public Meeting** – TAMUC respectfully requests that the ED reconsider its response to Comment 1 because it fails to thoroughly assess 30 TAC § 55.154(c). The ED has the authority to require multiple public meetings. Due to the inability of the TAMUC student body to participate in a meeting 20 miles from the

[1] 30 TAC § 55.203. TAMUC, as a higher educational institution, has an interest in performing its mission to educate the students of the State of Texas; is located across the highway from the proposed transfer station location; its operations and research will be affected by noise, traffic, odors, litter, and storm water runoff from the transfer station operations; seeks to keep its livestock and farm offerings free from interference by activities being proposed in the application; will be impacted if this proposed transfer station is approved; and owns agricultural property that will be impacted by the transfer station operations.
[2] 30 TAC § 55.201(b)(4) and (e). *See also* § 55.203.
[3] 30 TAC § 55.103. Affected person–A person 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. The determination of whether a person is affected shall be governed by § 55.203 of this title (relating to Determination of Affected Person), or, if applicable under § 55.256 of this title (relating to Determination of Affected Person).
[4] *See* 30 TAC § 55.201(e)

HB: 4861-2945-2596.1

Office of the President
P. O. Box 3011 • Commerce, TX 75429-3011 • Phone: 903.886.5014 • Fax: 903.886.5010 • www.tamuc.edu

A Member of the Texas A&M University System

location of the university and the proposed transfer station location, holding another public meeting that the TAMUC student body may more easily attend is necessary, proper, and may be hosted on the TAMUC campus at no cost to TCEQ or the applicant. TAMUC student body participation is critical so that TCEQ can ensure that the views of the students who would be most affected by the proposed transfer station may be heard and their views included in the record. The ED has the authority to call more than one meeting per the language in 30 TAC § 55.156(b)(2).

2. **Comment 2: Agency Should See the Site and Surroundings** – TAMUC respectfully requests that the ED reconsider its recommendation because the ED's response to Comment 2 is vague, and it is unclear what meaningful observations of the area surrounding the location of the proposed transfer station were made by TCEQ Staff. TAMUC requests that the ED provide a more thorough and detailed explanation of TCEQ Staff's observations so that the basis for the ED's decision and any information related to Staff's visit may be known and better understood.
3. **Comment 5: Application Review** – TAMUC respectfully requests that the ED reconsider its recommendation based on the totality of the circumstances and the impact that approving the application will have on the surrounding community. The ED's recommendation should specifically raise for the Commission the potential and particular impacts approving the transfer station might have on the community, including the TAMUC's existing research and educational facilities adjacent to this proposed transfer station. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
4. **Comment 12: Traffic and Roads** – TAMUC respectfully requests that the ED reconsider its recommendation based on information imparted at the public meeting about TAMUC's ongoing meetings with TxDOT since at least 2019 concerning numerous dangerous traffic conditions within less than one mile from the site of the proposed transfer station. Specifically, TAMUC requests that the ED address with TxDOT how the simultaneous use of the highway in the immediate vicinity of the proposed transfer station by large trash and sand trucks, TAMUC staff and students, and the general public, will not create a dangerous situation requiring at a minimum roadway modifications and improvements. TAMUC requests that the ED specifically discuss this evidence and information with TxDOT, that TxDOT provide written feedback to the ED based on TAMUC's and other affected persons' concerns, and that the ED take this written feedback into account as part of his reconsideration.
5. **Comment 13: Negative Impact on Community, Including Future Development** – TAMUC respectfully requests that the ED reconsider its recommendation by assessing 30 TAC § 330.61(h), which specifically directs TCEQ to assess the impact on the surrounding area, particularly "other factors associated with the public interest." TAMUC requests that the ED consider the impacts that approving the application might have on TAMUC and its mission to provide educational services and programs and the public's interest in assuring that those educational services and programs are not negatively impacted. TAMUC also requests that the ED state for the record his position that the approval of the transfer station is consistent with the public interest and is consistent with the uses of the surrounding area. TAMUC is deeply concerned that the presence of a trash processing facility in such close proximity to its farm and livestock offerings will chill its ability to maintain and grow these offerings immediately and

over time because of the threat that a waste facility poses to farm and livestock operations, testing, and research.

6. **Comment 15: Land-use Compatibility** – TAMUC respectfully requests that the ED state for the record his assessment of the potential impact that approving the proposed transfer station might have on the surrounding area and explain how the transfer station is compatible with surrounding area land uses. The application does not assess the impact of the facility on TAMUC, its farm and livestock offerings, programs, research, ability to draw funds to support those programs due to the threat posed by the proposed transfer station, and ability to retain and recruit talent for those programs. Further, the ED's analysis should go beyond the information that the applicant provided and include a detailed analysis of how other land uses might be impacted, which the ED fails to do in its recommendation. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
7. **Comment 16: Texas Parks and Wildlife Department (TPWD) Recommendations** – TAMUC respectfully requests that the ED explain how it determined that livestock would not be impacted when TAMUC has provided information explaining how the proposed transfer station would impact its livestock and educational offerings related to livestock. TAMUC also requests that the ED engage with TAMUC's livestock professionals and other third-party livestock professionals to better understand those impacts and explain in its subsequent recommendation how despite TAMUC's assessment of impacts to livestock from the proposed transfer station, the ED nevertheless recommends approval. Further, TAMUC respectfully requests that the ED provide evidence from TPWD that it has assessed TAMUC's concerns and provide evidence in writing of the ED consulting with TPWD.
8. **Comment 18: Effects on Texas A&M University-Commerce and Related Activities** – TAMUC respectfully requests that the ED provide a thorough assessment of the impact that the proposed transfer station might have based on "information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest" pursuant to 30 TAC § 330.61(h). The ED did not provide such analysis in its initial recommendation and requests that the ED thoroughly review the compatibility of the transfer station on the surrounding land use, as requested by numerous commenters during the public comment period.
9. **Comment 19: Location** – TAMUC respectfully requests that the ED specifically consult the North Central Texas Council of Governments (NCTCOG) or at least provide evidence that it has examined NCTCOG's new Regional Solid Waste Management Plan to ensure that the proposed transfer station is consistent with the updated plan. TAMUC also requests that the ED provide evidence that NCTCOG has considered the proposed transfer station in light of the updated NCTCOG plan, community feedback at the public meeting, and Hunt County solid waste ordinance, as part of the ED's reconsideration of his recommendation.
10. **Comment 23: Waste Acceptance, Including Sources of Waste** – TAMUC respectfully requests that the ED reconsider its recommendation because the applicant has not sufficiently detailed how it intends to screen and identify any wastes that are not acceptable at a Class V municipal solid waste facility nor has the applicant

sufficiently detailed measures the applicant intends to implement should any unacceptable wastes be identified.[5] TAMUC requests that the ED require the applicant to expressly state how it will manage such circumstances and how it will protect against inadvertently accepting such wastes.

11. **Comment 25: Local Ordinance Issued December 28, 2021** – TAMUC respectfully requests that the ED thoroughly explain how the community opposition to the proposed transfer station, which it has expressed through its local elected county representatives, is insufficient to find that the approval of the proposed transfer station is nevertheless still consistent with uses of the community and the surrounding area. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
12. **Comment 27: Noise** – TAMUC respectfully requests that the ED reconsider its recommendation based on the information provided to TCEQ in TAMUC's response to Comment 27 of the ED's RTC provided below. Specifically, the ED should also explain why in its determination the proposed transfer station and the nature of the resulting traffic do not endanger the aforementioned parties, including the impact of sudden noises and effects of those noises on animals, as was explained by Dr. Mumm and Dr. Harp during public comment.[6]
13. **Comment 28: Contaminated Water Management** – TAMUC respectfully requests that the ED reconsider its determination because of the potential for a large fire to occur and for the amount of the refuse water to exceed the capacity of the proposed transfer station to store the excess amount of water. The ED should consult with local firefighting professionals to quantify how much water might be necessary to put out a fire and whether the tanks at the transfer station are sufficient to contain that quantity of contaminated water. The ED should also address the implications and remedial actions that would be necessary in such an event and expressly explain why its recommendation is sufficient should such an event occur, including by addressing any impacts or potential impacts to surface waters.
14. **Comment 29: Surface Water** – TAMUC respectfully requests that the ED reconsider its recommendation and directs TCEQ to see its response to Comment 28.
15. **Comment 30: Groundwater, Drinking Water, and Aquifer Protection** – TAMUC respectfully requests that the ED reconsider its recommendation by considering requiring that the applicant install and maintain monitoring wells and agree to periodic testing, the results of which would be shared with affected parties, for purposes of ensuring that the aquifer and any nearby waters are protected now and over time as part of its reconsidered recommendation. Due to the shallow local aquifer and nearby surface waters, the ED's response should explain why monitoring wells are not necessary under these unique circumstances (shallow water table and nearby water sources) beyond stating that they are not required under TCEQ's rules.
16. **Comment 33: No Citizen's Collection Station (CCS)** – TAMUC respectfully requests that the ED reconsider its recommendation based on the applicant's representations at the public meeting on this issue and for the ED to require the applicant to manage and control any allowed CCS, including by providing detailed written processes and procedures by the applicant for dealing with any escaped refuse

[5] *See* 30 TAC § 330.103(5).
[6] *See* 30 TAC § 330.239.

as a result of the CCS if the proposed transfer station application is approved.[7] TAMUC and others should be allowed to monitor and verify these processes and procedures. Alternatively, the ED should require the applicant to confirm that no CCS will be allowed.

17. **Comment 35: Odor, Dust, Vapors, Methane, and Effect on Air Quality** – TAMUC respectfully requests that the ED reconsider its recommendation with respect to odor, dust, vapors, methane, and air quality, which can have an immediate impact on TAMUC's livestock programs and the animals that are part of those programs. Under the circumstances, the proximity of the transfer station to TAMUC's research farm and the constant animal presence, TAMUC believes that greater protections are necessary and a more immediate response mechanism is proper beyond providing a hotline number. TAMUC requests that the ED specifically address as part of its reconsideration why in his estimation additional protective measures are unnecessary and why the hotline number is sufficient under these specific circumstances.
18. **Comment 36: Odor Control Chemicals** – TAMUC respectfully requests that the ED reconsider its recommendation consistent with TAMUC's response to Comment 35 above.
19. **Comment 37: Vectors** – TAMUC respectfully requests that the ED reconsider its recommendation because of the acute threat that vectors would have on TAMUC's farm and livestock programs if the proposed transfer station is permitted. Specifically, the proposed protections will not sufficiently protect TAMUC's programs and animals. A hotline number is insufficient to provide a timely and effective response to the presence of various potential vectors that may contain diseases, including but not limited to rodents, fleas, flying pests, mites, etc., that may be challenging to timely identify and source. The ED should address this concern by discussing the application of TCEQ rules to his assessment.[8]
20. **Comment 38: Windblown Waste and Waste on Roads** – TAMUC respectfully requests that the ED reconsider its recommendation because ensuring that the trucks are covered is insufficient to protect the university's livestock from trash that escapes from the proposed transfer station facility. This is especially true if members of the community are allowed to utilize the facility because there will be another source of trash present that the applicant must be responsible for if TAMUC's livestock are to be protected. The ED's recommendation should include not only what the TCEQ rules require but also what makes sense due to the uses of the surrounding area. A hotline number to report nuisances is insufficient because when trash escapes from the facility, prior to arriving at the facility, or when being transported from the facility, that trash poses an immediate threat to TAMUC's farm and livestock programs and immediate action is necessary to eliminate the threat. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
21. **Comment 39: Operating Hours** – TAMUC respectfully requests that the ED reconsider his recommendation because TAMUC and others have provided clear information explaining how the operating hours proposed by the applicant will disrupt TAMUC's livestock programs and research as well as coincide with heavy use by the campus community. If the proposed transfer station is approved, the ED should

[7] *See* 30 TAC § 330.213.
[8] *See* 30 TAC § 330.7 (8) & (9).

consider requiring the applicant to begin utilizing the transfer station no earlier than 10AM and for operations to cease at 4PM, after students, faculty, and staff, and others have safely arrived at or departed from the university without having to navigate the presence of the large trash trucks associated with the transfer station. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.

22. **Comment 40: Fire, Firefighting Activities, and Volunteer Fire Department** – TAMUC respectfully requests that the ED reconsider its recommendation due to the unique nature of the surrounding area and consult the local fire marshal and local fire department(s) to confirm that the fire plan required under TCEQ rules sufficiently meets the needs of the local firefighting community. Further, the plan should also ensure that TAMUC and local residents are protected from fire threats.
23. **Comment 41: Dumping Outside Transfer Building** – TAMUC respectfully requests that the ED reconsider its recommendation in light of the fact that the applicant intends to allow members of the public to utilize the transfer station. The ED should explain specifically which measures that the applicant would be required to implement and maintain to prevent trash from being dumped outside of the facility. For example, if a member of the public arrives at the facility when it is closed, what will prevent the member of the public from leaving their trash, even if they are not supposed to do so, outside of the facility? This is a concern of TAMUC because leaving trash of unknown quality and character outside of the facility would pose a threat to TAMUC's farm and livestock programs.
24. **Comment 42: Visual Damage to Community** – TAMUC respectfully requests that the ED reconsider its recommendation by responding to the substance of the concerns regarding the visual impact that approving the transfer station would have on the surrounding area. The applicant has verbally agreed to install trees and fences to mitigate the ability of others to see the transfer station. The ED should require these details to be included in the application and approved permit if the transfer station is ultimately approved.
25. **Comment 43: 72-hour Waste Storage** – TAMUC respectfully requests that the ED reconsider its recommendation not only based on the applicable rule but based on practicality. TAMUC hosts large scale and heavily attended events that begin on Fridays during the summer and end the following week. During summer months, the Texas heat is certain to cause increased odors by decomposing the contents held within the transfer station. Because winds blow in the direction of TAMUC from the transfer station, it is certain that odors will impact TAMUC's events. While TAMUC appreciates the ED's provision of a hotline number in such events, it is unlikely that calling the hotline number on a hot Texas-summer Saturday will result in abatement of any nuisance caused by the transfer station until the following week—which could severely tarnish TAMUC events. TAMUC requests that the ED thoroughly address this circumstance and how it will be mitigated as a condition of approval if the proposed transfer station is ultimately approved. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
26. **Comment 45: Communities Served** – TAMUC respectfully requests that the ED reconsider its recommendation by clearly and thoroughly explaining why a transfer station of this size is necessary given the needs of the community. The ED should consider recommending the approval of a smaller facility that actually meets the area's

needs. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.

II. Response to ED's Responses to Public Comments (RTC)

TAMUC disputes the following responses to the RTC by the ED and provides the following for consideration. For convenience, TAMUC provides the initial comment, the ED's response, and TAMUC's response to the ED's response.

Comment 1: Location of Public Meeting

Travis Ball, Nicolas Scott noted that the public meeting was held 20 miles away from the location for the proposed transfer station and indicated that this led to inadequate participation, particularly from students at Texas A&M University-Commerce, which has a facility located roughly across the highway from the proposed location.

ED Response 1:

TCEQ's rules regarding public meetings require that a public meeting be held in the county in which the facility is proposed to be located, but the rules do not set a limit for the distance a public meeting venue may be from the proposed location under consideration at that meeting. The Executive Director does not have the authority to require the applicant to hold a meeting at a specific venue, such as those at the university property.

TAMUC's Response to ED's Response to Comment 1: TAMUC contends that the applicant deliberately opted to hold the public meeting as far away from the TAMUC campus in Commerce as possible and still be within Hunt County to prevent TAMUC students from publicly expressing their opposition to the proposed transfer station. Only two (2) students from TAMUC were able to attend the public meeting despite large numbers of students expressing interest in and opposition to the application. TAMUC believes that the students should be afforded the opportunity to participate in the public forum and is willing to host a public meeting on campus so that the students who are impacted by the proposed transfer station may have their concerns added to the record. The very rule cited by the ED in the RTC explicitly states, "[a]t any time, the executive director or the Office of the Chief Clerk may hold public meetings," meaning that while the ED may not be able to determine the location of a public meeting, the ED does have the authority to hold multiple public meetings.[9] Further, as is evidenced in Comment 2, below, the ED may decide to take actions not required under TCEQ rules such as directing TCEQ Staff to visit a site. Under the circumstances, TAMUC requests that TCEQ hold another public meeting and ensure that this meeting is more accessible to TAMUC students and local residents, who would be impacted if the transfer station is approved.

Comment 2. Agency Should See the Site and Surroundings

[9] 30 TAC § 55.154(c)

Randy Harp suggested that agency staff should see the proposed site and surroundings before issuing a permit.

ED's Response 2:

The MSW rules do not require the Executive Director's staff visit a proposed location of a transfer station before issuing a permit. Staff took the opportunity to see the proposed location and survey the surrounding community before the public meeting held on April 28, 2022.

TAMUC's Response to Comment 2: The ED's response to Comment 2 is vague. It is unclear what is meant by "took the opportunity to see the proposed location and survey the surrounding community." TAMUC respectfully requests that the ED provide detailed information about TCEQ's visit to the location and what is meant by "survey" so the public may understand the details evaluated by TCEQ Staff for purposes of better understanding the basis of the ED's decision. TAMUC is concerned that TCEQ did not adequately examine the surrounding area while performing its "survey" or learn about the various impacts to affected persons such as TAMUC. While the rules may not require TCEQ Staff to visit a site, when a facility like a transfer station is proposed along a major highway located directly across from a university, at minimum, a site visit and engagement with various stakeholders is prudent. TAMUC is glad to facilitate a tour of the area to help TCEQ better understand and visualize the impacts that the transfer station would have on its operations if the application is approved.

Comment 5: Application Review

Christopher Jeremy Brecheisen, David Alan Giles, and Jonathan Manning criticized the review process, suggesting that applications are "rubber-stamped" and noted that the engineer at the public meeting representing the Executive Director, indicated that 100% of applications he had reviewed were approved. Travis Ball, Jonathan Manning suggested that the review process is for show and asked how many applications have been denied recently. Christopher Jeremy Brecheisen asked if the TCEQ can be stricter than the United States Environmental Protection Agency (USEPA) and if so, requested examples. Christopher Jeremy Brecheisen further indicated that the applicant failed to meet federal Resource Conservation and Recovery Act (RCRA) requirements for a pre-application meeting with the community.

ED's Response 5:

The Executive Director performs a through and objective review of all applications. The Commission hires Professional Engineers, Professional Geologists, and Environmental Specialists to review incoming MSW applications, reports, notifications, and other submittals. This Application was reviewed by Mr. Odil, a Professional Engineer and has been with the Commission over 18 years. He reviewed the application thoroughly and objectively, like all applications reviewed by the Executive Director's staff. Application reviews are conducted to identify all deficiencies and follow established procedures to help ensure all rule requirements are met for an administratively and technically complete application.

At the public meeting, Mr. Odil noted that 100% of applications he has reviewed have been issued, however, he was referring only to applications that were determined to be technically complete. Other MSW applications reviewed by Mr. Odil did not reach technical completion and were withdrawn. Reasons for withdrawal by an applicant vary but include unsatisfactory responses to issues identified by the Executive Director's staff. In the last five years, the MSW Permits Section issued approximately 80 new permits, permit amendments, and limited-scope permit amendments. During the same period, ten applications were withdrawn and one was returned.

TCEQ rules can be more restrictive than federal rules. Texas has authority from the USEPA to regulate these facilities under its rules, so the state program is expected to meet or exceed the federal program. Examples of where the TCEQ rules are more prescriptive include, but not limited to, approvals from other governmental entities when MSW activities may potentially impact items in their purview, like Texas Department of Transportation for road suitability, Texas Historical Commission for compliance with the Texas Antiquities Code, and Federal Emergency Management Agency for 100-year floodplain impacts; buffer and easement restrictions; surrounding land-use data; and website requirements. Pre-application meetings with the community are optional under 30 TAC Chapter 330.

TAMUC's Response to Comment 5: The ED's response to Comment 5 only further establishes that TCEQ's approval of transfer station applications is essentially automatic. As long as an application is deemed "complete" by TCEQ staff and the ED, it will be approved. The extent of TCEQ's review and the review by professionals TCEQ tasks with assisting that review has become ministerial. TAMUC believes its students and the public deserve a less mechanical determination—especially when so many affected parties are involved. Just because an applicant can provide the requested information should not determine whether approval is correct and proper without assessing the totality of the circumstances and how the transfer station will meet the regulatory criteria. In other words, the process described by the ED reflects attention to the gathering of information and inattention to the implications of the information gathered and the project that is ultimately approved. The requirements of 30 TAC § 330.61(h), must be assessed as part of the review process.

Comment 12: Traffic and Roads

Amanda Adams, Robin Alexander, Janet Anderson, Christy Andrzejewski, Christopher Babb, Travis Ball, Billy Rhea Beane, Cathy Beane, Michael Beane, Michele Benjamin, Jimmy Babb, Dave Bickley, Jay Boshart, Amy Braley, Christopher Jeremy Brecheisen, James Brown, Karla Burke, Daniel Clark, Ted Ray Crim, Jeffrey Cross, Sean Dawson, Amanda Delisle, Ethan Elmore, Patrick Etie, Lory Foster, Daryl Wayne Freelen, Diana Fults, Stephen Gilcrest, David Alan Giles, Raymond Green, Connie Hale, Brett Harmon, Bunny Harmon, Randy Harp, Richard Helge, Anna Knutson, Susan Lousberg, Jonathan Manning, Ronald Manning, Barba McCord, Joe McCracken, Dustin McNeese, Mary Miller, Vickie Mize, Jessie Moore, Denise Morgan, Crystal Mumphrey, Kayla Price, Brad Rabe, Mark Rudin, Amanda Scott, Alison Soeder, Daniel Starks, Karen Starks, Bobby Stovall, Janis Stroope, Lynn Sutherland, Robert Sutherland, Texas A&M University-Commerce Student Government Association, Elizabeth Tarrant, Kevin Tibboel, Cyrus Vaughan, and Jill Wickersham shared concerns over traffic on Highway 24 in the vicinity of the proposed transfer station. Tammy Colclasure, Kelly Kuehl, and Jessie Moore indicated that the associated

traffic would damage roads. Kelly Kuehl was concerned that this damage would cause an increase in taxes. Janis Stroope felt that a waste facility would be disrespectful to the Flying Tiger Memorial Highway. Jessie Moore asked questions about which towns will have contracts and what roads will be used to bring trash to the proposed facility.

ED's Response 12:

In accordance with 30 TAC § 330.61(i), an Application for an MSW transfer station permit must include data on access roads for the proposed facility, including: availability and adequacy of roads that the owner or operator will use to access the site; volume of vehicular traffic on access roads within one mile of the proposed facility, both existing and expected, during the expected life of the facility; and projections on the volume of traffic expected to be generated by the facility on the access roads within one mile of the proposed facility. This information is provided in Parts I/II, Section 3.2 of the Application. Section 3.2.2 states that State Highway 24 is adequate to handle total projected volumes throughout the expected life of the facility.

When reviewing permit applications, the Executive Director defers to the Texas Department of Transportation (TxDOT) recommendations on traffic issues and the adequacy of state-maintained roadways to be used by a proposed MSW facility. Documentation of coordination with TxDOT, required under 30 TAC § 330.61(i)(4), is provided in Parts I/II, Appendix I/II-A.3 of the Application. As documented in the Application, TxDOT did not require road improvements in the vicinity of the proposed location.

The Executive Director is not authorized to consider the effect that a proposed facility will have on road maintenance or on taxes to address it. Nor is there any prohibition to locating MSW facilities along memorial highways. Other questions regarding contracts and traffic details beyond the scope described above are outside the authorization of the Executive Director.

TAMUC's Response to Comment 12: TAMUC believes that TxDOT should be further engaged to discuss the unique nature of the traffic in the area where the transfer station is proposed to be located. TAMUC has had prior and ongoing discussion with TxDOT about safety issues in this area since at least 2019. TxDOT has determined it is necessary to implement additional safety measures along this exact stretch of highway upon more detailed review after TxDOT initially determined additional safety measures were not necessary. If the transfer station is approved, large numbers of students and high volumes of trucks moving at highly varying speeds (the speed limit in this area is 75 mph) will utilize the same section of highway located between the transfer station and TAMUC campus at the same time of day and will likely, and in TAMUC's experience, certainly lead to unnecessary and dangerous situations. In addition, these sanitation trucks and students will be preforming turn maneuvers in the same cross-over area to reach their respective facilities as the transfer station and TAMUC students utilize the same intersection. There are already dangerous situations created by the trucks entering and exiting the sandpit facility, which is essentially collocated with the proposed transfer station. Further, TAMUC has already alerted TxDOT and the Texas Legislature of existing traffic issues within less than one mile of the proposed transfer station. In this case, TAMUC is certain more information and analysis of traffic patterns is critical beyond just the volume of traffic and the capability of Highway 24 to handle that volume. Further, the ED did not coordinate with TxDOT as is required under 30 TAC §

330.23(a) because no design capacity to account for the large size and volume of trucks and the simultaneous high-volume use by TAMUC students, faculty, and staff has been provided. TAMUC has engaged with TxDOT and the agency is prepared to consider additional information. TAMUC respectfully requests that the ED specifically coordinate with TxDOT on this issue and provide meaningful and substantive feedback in a supplemental response to this comment.

Comment 13: Negative Impact on Community, Including Future Development

Amanda Adams, Robin Alexander, Christopher Babb, Yumei Bao, Michael Beane, Dave Bickley, Tami Bishop, Amy Braley, Christopher Jeremy Brecheisen, James Brown, Ashley Bryan, Karla Burke, Cathy Certain, Courtney Clanton, Ted Ray Crim, Ethan Elmore, Steven Ford, Lory Foster, Noah Garcia, David Alan Giles, Connie Hale, Randy Harp, Cody Helm, Sarah Helm, Anna Knutson, Joan Lambert, Alyssa Logston, Jonathan Manning, Liz Medina, Crystal Mumphrey, Kayla Price, Cynthia Ross, Nicholas Scott, Michael Stark, Daniel Starks, Lynn Sutherland, Elizabeth Tarrant, Kevin Tibboel, and Ashley Whitmore were concerned that the proposed facility would have a negative impact on their community, including future growth and development.

ED's Response 13:

The TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. Accordingly, the TCEQ does not have jurisdiction to consider economic impacts, such as impacts to livelihoods, on surrounding areas when determining whether to approve or deny a permit application. Growth trends are discussed in Parts I/II, Section 2.4.3 of the Application. The discussion was based primarily on communication with Hunt County, which indicated that there were no plats for development within five miles of the transfer station as of November 2021. The ground survey of the area discussed in the Application did not reveal any growth trends or direction of major development within five miles of the proposed location. The Executive Director has determined that adequate information on growth trends was provided in the Application.

TAMUC's Response to Comment 13: The scope through which TCEQ interprets its own rules is too narrow to be useful given the nature of the area surrounding the location of the proposed transfer station and ignores 30 TAC § 330.61(h), which specifically directs TCEQ to assess the impact on the surrounding area, particularly "other factors associated with the public interest." In this case, TAMUC contends that the public interest of TAMUC and its mission to provide educational services and programs must be weighed with the public interest associated with a transfer station. Here, the applicant provided TCEQ with what the application requires. However, that does not indicate that the use of the transfer station is consistent with the uses of the surrounding area. TAMUC requests that the ED provide substantive and meaningful feedback in its response to this comment.

Comment 15: Land-use Compatibility

Amanda Adams, Janet Anderson, Christopher Babb, Travis Ball, Dave Bickley, Kathryn Brandt, Christopher Jeremy Brecheisen, James Brown, Cathy Certain, Daniel Clark, Ted Ray Crim, Amanda Delisle, Patrick Etie, Lory Foster, Daryl Wayne Freelen, Raymond Green, Connie Hale,

Anna Knutson, Joan Lambert, Leslee Lay, Barba McCord, Kayla Price, Brad Rabe, Mark Rudin, Amanda Scott, Michael Starks, Daniel Starks, Lynn Sutherland, Keith Tarrant, Reabeccah Tarrant, Cyrus Vaughan, and Vickie Wood indicated that the proposed facility was incompatible with the community where it would be located.

ED's Response 15:

Applicants for transfer stations must provide information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest. Specifically, an applicant must provide information, including an available published zoning map for the facility and within two miles of the facility for the county or counties in which the facility will be located; information about the character of the surrounding land uses within one mile of the proposed facility; information about growth trends within five miles of the facility with directions of major development; information on the proximity of the facility to residences, business establishments, and other uses within one mile, such as schools, churches, cemeteries, historic structures and sites, archaeologically significant sites, and sites having exceptional aesthetic quality; information regarding all known wells within 500 feet of the site; and any other information requested by the Executive Director.

The Applicant provided the required information in its Application; specifically, in Parts I/II, Section 3.1, and Figure I/II-5, Land Use Map. The Application indicates that surrounding land use within one mile of the proposed permit boundary is 58.4% open space, 21% institutional, 6.8% residential, 6.5% commercial, 4.7% agricultural, and 2.3% water bodies. The Application indicates there are 90 residences and 10 businesses within one mile of the proposed permit boundary. The nearest residence is about 150 feet from the proposed transfer station. No licensed daycare facilities or hospitals were identified within one mile. A country club and golf course are located about 1/2 mile to the east. No other parks and recreational areas were identified. Property containing facilities associated with Texas A&M University–Commerce is located across State Highway 24 to the west of the proposed transfer station. No other schools were identified within one mile. There are no known churches or cemeteries within one mile. Based on review from the Texas Historical Commission, no historical properties, archeological sites, or other cultural resources are present or would be affected by the proposed facility. Parts I/II, Section 3.1.1 of the Application indicates that the proposed location is outside of the incorporated limits of any city and is therefore not subject to any known city zoning ordinances.

The use of any land for a MSW facility must not adversely impact human health and the environment. (30 TAC § 330.61(h)). The TCEQ rules do not establish specific limits on these factors and only require that an applicant provide current and accurate information regarding these factors in the application. The Executive Director has determined that adequate information on land-use compatibility was provided in the Application.

TAMUC's Response to Comment 15: The existing land uses are incompatible with a transfer station in the proposed location. As discussed by TAMUC in its response to Comment 13 above, the impact to the surrounding area and the compatibility of land use should be taken into account. The ED satisfies itself that the requisite information has been submitted but fails to assess, analyze,

and evaluate the impact to the surrounding area and provide articulable conclusions in his response. Using this approach, it is unsurprising that all transfer stations proposed to TCEQ to be built are approved.

Comment 16: Texas Parks and Wildlife Department (TPWD) Recommendations

Karen Hardin, representing the Texas Parks and Wildlife Department (TPWD), provided suggestions for design and operation of the proposed facility if the permit is issued. These recommendations include: periods when no vegetation clearing would occur, pre-clearance surveys, minimization of exterior lighting, disturbance-free buffers along natural features, relocation of potentially affected native aquatic resources; preparation of and adherence to an aquatic invasive species transfer prevention plan; precautions to avoid impacts to Species of Greatest Conservation Need (SGCN) flora and fauna; minimization of disturbances to prairie vegetation; and avoidance of non-native species such as bermudagrass in seeding or revegetation plans. Similarly, Christy Andrzejewski, Michelle Babb, Cathy Beane, Christopher Jeremy Brecheisen, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Steven Ford, Noah Garcia, Alicia Guerra, Connie Hale, Mike Hale, Bunny Harmon, Randy Harp, Kelly Kuehl, Leslee Lay, Chelsea Morse, Jared Mumm, Mark Rudin, Amanda Scott, Robert Sutherland, Elizabeth Tarrant, Reabeccah Tarrant, and Ashley Whitmore felt that the proposed facility would adversely affect wildlife and livestock in its vicinity.

ED's Response 16:

An applicant for an MSW transfer station must consider the impact of the proposed facility on endangered or threatened species under 30 TAC § 330.61(n). The Application addresses these requirements in Parts I/II, Section 3.6 and in Parts I/II, Appendix II-B of the Application.

The TCEQ protects human health and the environment through the implementation and enforcement of 30 TAC Chapter 330 and other applicable regulations. The Executive Director has reviewed the application and preliminarily determined that it satisfies the statutory and regulatory requirements concerning protected wildlife, wildlife habitats, and livestock.

TAMUC's Response to Comment 16: TAMUC is the only party to this proceeding in the business of raising livestock with actual professionals employed for this purpose. In the opinion of TAMUC's trained livestock professionals, the proposed transfer station poses a threat to its livestock and TAMUC's offerings related to livestock raising and research.

Comment 18: Effects on Texas A&M University-Commerce and Related Activities

Adams, Alexander, Christopher Babb, Travis Ball, Dave Bickley, Tami Bishop, Cinda Boshart, Aden Boyer, Christopher Jeremy Brecheisen, Courtney Clanton, Daniel Clark, Ted Ray Crim, Amanda Delisle, Ethan Elmore, Lory Foster, Diana Fults, Noah Garcia, Stephen Gilcrest, David Alan Giles, Raymond Green, Connie Hale, Randy Harp, Richard Helge, James Hudson, Autumn Johnson, Alyssa Logston, Jonathan Maning, Barba McCord, Tina McCord, Liz Medina, Denise Morgan, Jared Mumm, Crystal Mumphrey, Kayla Price, Mark Rudin, Tim Schauer, Amanda Scott,

Alison Soeder, Michael Stark, Daniel Starks, Leanne Stevens, Bobby Stovall, Janis Stroope, Lynn Sutherland, Texas A&M University-Commerce Student Government Association, Kristi Taylor, Mickey Trusty, James Wickersham, and Jill Wickersham expressed their concern about the effect that the proposed facility would have on the Texas A&M University-Commerce facility located across Highway 24.

Similarly, Randy Harp and Jared Mumm indicated that the facility would have a detrimental effect on research at the facility and its funding.

ED's Response 18:

The TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. Accordingly, the TCEQ does not have jurisdiction to consider economic impacts, such as impacts to livelihoods, research, or research funding, on surrounding areas when determining whether to approve or deny a permit application. The Executive Director has reviewed the application and preliminarily determined that the facility, operated according to the permit provisions and 30 TAC Chapter 330, would adequately protect human health and the environment and prevent adverse health and environmental impacts.

TAMUC's Response to Comment 18: TAMUC respectfully contends that the ED is incorrect in his interpretation of TCEQ's rules. 30 TAC § 330.61(h) requires TCEQ to assess precisely what the ED claims it cannot: "information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest." The ED satisfies itself so long as the applicant submits this information but seems to decline to actually analyze that information. TAMUC requests that the ED actually address the issues raised by the rules as applied to the application and the circumstances at issue. TCEQ must also consider the large investment made by the State of Texas and its use of taxpayer funds to provide an educational environment at TAMUC for its agricultural curriculum. This proposed transfer station will not only negatively affect TAMUC's students, faculty, and staff but will negatively affect the research being performed by TAMUC.

Comment 19: Location

Christopher Babb, Christopher Jeremy Brecheisen, Daniel Clark, Ted Ray Crim, Jeffery Cross, Michael Hoffman, Jonathan Manning, Chelsea Morse, Janis Stroope, and Reabeccah Tarrant indicated that the proposed transfer station is not needed. Some of these individuals noted that the Maloy landfill in Campbell is approximately five miles away from the proposed location. Christy Andrzejewski, Travis Ball, Yumei Bao, Ted Ray Crim, Ethan Elmore, Diana Fults, Randy Harp, James Hudson, Susan Lousberg, Vickie Mize, and James Wickersham indicated that the proposed facility should be located somewhere else. Amanda Adams stated that the proposed facility would have no benefit to the community. Christopher Jeremy Brecheisen, Jonathan Manning, and Bobby Stovall indicated that the proposed location is bad or unusual. Travis Ball asked where transfer stations are typically found. Travis Ball indicated that the proposed location is not optimal and recommended the reconsideration of the North Central Texas Council of Governments (NCTCOG) approval of the proposed location.

ED's Response 19:

TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. TCEQ does not have the authority to specify locations for transfer stations or to suggest alternatives to the location that the Applicant has proposed for the facility. The Executive Director is only permitted to review the application, as the Applicant has submitted it, for compliance with all applicable rules.

In accordance with Texas Health and Safety Code Chapter 363 and 30 TAC Chapter 330, a council of government reviews MSW applications to determine conformance with the COG's Regional Solid Waste Plan (RSWP). North Central Texas COG indicated that the proposed facility conforms with their RSWP.

TAMUC's Response to Comment 19: The NCTCOG is in the process of promulgating a new Regional Waste Management Plan. While TCEQ is correct it cannot specify a location, it can examine a proposed location, identify problems and issues associated with that location and determine that the proposed location is not acceptable. Additionally, the NCTCOG voted to support the proposed transfer station at issue; however, TAMUC has subsequently discussed this transfer station with NCTCOG and at the time that the applicant presented to the NCTCOG, it was unaware that any community concerns would arise. In addition, NCTCOG confirmed that it does not have the opportunity to review any subsequent changes made to the Application and its finding is only that the transfer station conforms to the regional solid waste plan, which is a much narrower finding than TCEQ's review. TAMUC urges the ED to examine the new solid waste plan to determine whether the proposed transfer station is consistent with that plan beyond a general need for more transfer stations in north-central Texas. North Central Texas is large area and most certainly, certain locations are preferable to others. TAMUC requests that the ED provide the public reasons why the proposed transfer station is necessary in this location.

Comment 23: Waste Acceptance, Including Sources of Waste

Christopher Jeremy Brecheisen, Tammy Colclasure, Sean Dawson, Connie Hale, Karen Hammons, Randy Harp, John Kirkpatrick, and Katharine Knoodle asked about the types of waste that would be accepted at the proposed facility, including whether "Level 5" waste and hazardous waste would be accepted, and how there could be no limitations on the waste, as indicated in the Application.

ED's Response 23:

In accordance with 30 TAC § 330.61(b), an application for a transfer station must include the sources and characteristics of waste to be received for storage or processing. This information is specified in Parts I/II, Section 2.2; Part IV, Section 2; and Appendix IV-1 of the Application. According to the Application, the Highway 24 Transfer Station will accept MSW resulting from, or incidental to municipal, community, commercial, institutional, and recreational activities, including garbage, putrescible wastes, rubbish, ashes, brush, street cleanings, automobile parts, construction-demolition waste, and yard waste; Class 2 non-hazardous industrial solid waste;

Class 3 non-hazardous industrial solid waste; and special waste. The proposed facility will not accept wastes for which storage or processing are prohibited under 30 TAC § 330.15(e) or other wastes as specified in Parts I/II, Section 2.2.1 of the Application. These prohibited wastes include regulated hazardous waste, hazardous waste from very small quantity generators, polychlorinated biphenyl (PCB) waste, radioactive waste, regulated asbestos-containing materials, liquid waste, Class 1 industrial waste, used oil, used oil filters, whole used or scrap tires, and items containing chlorinated fluorocarbons (CFCs).

"Level 5" is not a designation for waste under MSW Rules; this appears to be a misunderstanding of the "Type V" designation in Chapter 330 for MSW storage and processing facilities. 30 TAC § 330.61(b)(1) requires an applicant to explain constituents or characteristics that could be a limiting parameter for an MSW facility. An early version of the application indicated that there were no limitations on the waste that would be accepted at the facility. During the review process the applicant clarified that if contaminant concentrations indicated the waste included Class 1 industrial waste, regulated hazardous waste, or characteristics indicating prohibited wastes (such as the presence of Polychlorinated biphenyls (PCB) waste or Regulated Asbestos Containing Materials (RACM), are limiting parameters and the waste would not be accepted at the transfer station.

TAMUC's Response to Comment 23: TAMUC requests that the ED require the applicant to state how it intends to identify any unacceptable waste and the processes and procedures that it will implement should any unacceptable classes of wastes be identified and disposed of at the proposed transfer station. This is required pursuant to 30 TAC § 330.103(5)(d)-(e).

Comment 25: Local Ordinance Issued December 28, 2021

Kevin Tibboel indicated that the Application is in violation of a local ordinance passed by the Commissions Court of Hunt County, Texas.

ED's Response 25:

The Hunt County Commissioners Court passed an ordinance,[10] effective December 28, 2021, that provides siting criteria for solid waste processing facilities. This Application was received on August 18, 2021, and administratively complete on September 14, 2021, which was prior to the ordinance effective date. In accordance with Texas Health and Safety Code § 364.012(e)(1), the county commissioners court may not prohibit the processing or disposal of MSW in an area of the county where an application for a permit has been filed with and is pending before the commission.

TAMUC's Response to Comment 25: While the filing of the transfer station application preceded the passage of the Hunt County ordinance, the message to the applicant and TCEQ as a result of the ordinance's passage is unmistakable: this transfer station is not welcome in Hunt County and is inconsistent with the surrounding land uses of the community. This action alone is sufficient grounds for TCEQ to disapprove the application because it evidences that the community opposes

[10] *See* Ordinance Prohibiting Solid Waste Disposal in Hunt County *available at* https://newtools.cira.state.tx.us/upload/page/8875/docs/PUBLIC%20NOTICE%20-%20Hunt%20County%20Landfill%20Regulations.pdf (Dec. 28, 2021)

the transfer station in this location and recognizes it as incompatible with the community. But for this specific transfer station application, Hunt County would not have passed the ordinance.

Comment 27: Noise

Travis Ball, David Alan Giles, Randy Harp, Jessie Moore, Jared Munn, Crystal Mumphrey, Jillian Nichols, Mark Rudin, Amanda Scott, Texas A&M University-Commerce Student Government Association, and Kevin Tibboel believe that the proposed facility would generate noise detrimental to the surrounding neighbors.

ED's Response 27:

The TCEQ's jurisdiction is established by the Legislature and is limited to the issues set forth in statute. TCEQ rules do not set specific limits on the amount of noise generated by transfer station activities, vehicles, or equipment. However, a permit issued by the Commission "does not authorize any injury to persons or property or an invasion of other property rights, or any infringement of state or local law or regulations," in accordance with 30 TAC § 305.122(d). The Executive Director has reviewed the application and preliminarily determined that it satisfies the regulatory requirements regarding noise for the proposed facility.

By rule, waste acceptance hours are from 7:00 a.m. to 7:00 p.m., Monday through Friday, and operating hours are from 5:00 a.m. to 9:00 p.m., Monday through Friday; however, the rule notes that other hours may be approved. In Section 15 of Part IV of the Application, the Applicant has proposed waste acceptance hours from 5:00 a.m. to 6:00 p.m., Monday through Saturday, and operating hours from 4:00 a.m. to 7:00 p.m., Monday through Saturday.

TAMUC's Response to Comment 27: Allowing large trash trucks at the times proposed by the applicant is detrimental because the noise from the trucks and operation of the transfer station would impact TAMUC's livestock programs. The trucks from the sandpit, which is located on the same property as the proposed transfer station already cause backups and dangerous situations. TAMUC beseeches the ED reconsider its recommendation for the safety of TAMUC students, faculty, and staff and roads or at the least, require modifications to enhance safety in this location.

Comment 28: Contaminated Water Management

Dave Bickley, Christopher Jeremy Brecheisen, James Brown, Tammy Colclasure, Sean Dawson, Armando Delecruz, Ethan Elmore, Mike Hale, Randy Harp, Kelly Kuehl, Jessie Moore, Jared Munn, Brad Rabe, Karen Starks, and Lynn Sutherland were concerned about liquids released from the waste and how it would be managed.

ED's Response 28:

The definition of contaminated water in 30 TAC § 330.3(36) includes any water that has contacted waste, therefore liquids from waste at the proposed facility would be contaminated water. Unpermitted discharge of contaminated water is prohibited under 30 TAC § 330.207(a). Part III, Sections 2.3.3 and 4.2 clarify that contaminated water, including floor wash water, will be directed

by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water dual-walled storage tank with an interstitial space for leak detection monitoring. The tank would hold somewhere between 500 and 2,000 gallons. A vacuum truck would remove the wastewater from the storage tank and transport it to an authorized facility.

TAMUC's Response to Comment 28: TAMUC is concerned that circumstances could cause water in excess of 2,000 gallons to overwhelm the proposed contaminated water containment system and urges TCEQ to ensure that the facility is built to support holding enough containment capacity if for example, a large fire occurred and multiple fire trucks were necessary to prevent contaminated water from escaping from the transfer station site. It is likely that in such an event, the water containment system would be inadequate and actual quantities must be determined. TAMUC requests that the amount of water utilized to combat a fire at the transfer station be identified and whether that amount of water is able to be contained be determined.

Comment 29: Surface Water

Michelle Babb, Yunei Bao, Michael Beane, Jay Boshart, Amy Braley, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Steven Ford, Noah Garcia, David Alan Giles, Kelly Kuehl, Denise Morgan, Jared Mumm, Crystal Mumphrey, Nicholas Scott, Karen Starks, Elizabeth Tarrant, Reabeccah Tarrant, Kevin Tibboel, and Vickie Wood stated concerns that the proposed facility would adversely affect surface water in the vicinity.

ED's Response 29:

The definition of contaminated water in 30 TAC § 330.3(36) includes any water that has contacted waste. Unpermitted discharge of contaminated water is prohibited under 30 TAC § 330.207(a). Part III, Sections 2.3.3 and 4.2 clarify that contaminated water, including floor wash water, will be directed by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water holding tank holding somewhere between 500 and 2,000 gallons. Design for this tank is shown on Detail 1 on Figure III-1.7 in Part III of the Application. A vacuum truck will remove the wastewater and transport it to an authorized facility. Properly managed contaminated water will not contaminate surface water.

TAMUC's Response to Comment 29: TAMUC directs TCEQ to see its response to Comment 28, above and reconsider its response accordingly.

Comment 30: Groundwater, Drinking Water, and Aquifer Protection

Christy Andrzejewski, Jimmy Babb, Travis Ball, Yunei Bao, Michele Benjamin, Jay Boshart, Amy Braley, Kathryn Brandt, Christopher Jeremy Brecheisen, Daniel Clark, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Ethan Elmore, Steven Ford, Stephen Gilcrest, Cathy Giles, David Alan Giles, Alicia Guerra, Tandy Hagar, Connie Hale, Mike Hale, Brett Harmon, Randy Harp, John Kirkpatrick, Kelly Kuehl, Mary Miller, Denise Morgan, Jared Mumm, Mark Rudin, Amanda Scott, Nicholas Scott, Alison Soeder, Karen Starks, Lynn Sutherland, Elizabeth Tarrant, Keith Tarrant, and Reabeccah Tarrant shared their concerns that the facility would adversely affect groundwater and drinking water. Similarly, Jimmy Babb wanted to know if regular water

tests and surprise inspections will be performed by the TCEQ and what guarantees citizens have to ensure that water supply is not contaminated. David Alan Giles indicated that the TCEQ only cares about the Edwards Aquifer. Additionally, Daryl Wayne Freelen expressed concern that the proposed facility would cause contamination to his water supply line.

Similarly, Christopher Jeremy Brecheisen asked if the TCEQ can help the community perform baseline tests of area water wells to check for toxin levels prior to project start (maybe at least those within a mile of the project). Christopher Jeremy Brecheisen noted that many local residents including families rely on well water for drinking and bathing.

ED's Response 30:

If the permit is issued, all waste will be unloaded onto a concrete floor. Liquids would drain to a sump and then to a dual-walled storage tank with an interstitial space for leak detection monitoring. Design for this tank is shown on Detail 1 on Figure III-1.7 in Part III of the Application. A more detailed discussion of contaminated water management is provided elsewhere in this RTC. The Executive Director has concluded that features to prevent contamination of groundwater have been addressed in the Application. Groundwater monitoring is not required for transfer stations under MSW rules.

Regular water tests for groundwater are not provided by the TCEQ. Regional offices perform inspections of regulated facilities and respond to all complaints from the public. While the Edwards Aquifer is specifically protected by the prohibition from landfills, all aquifers are protected by the other rules in Chapter 330, including requirements for liner systems at landfills and contaminated water management.

If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 30: TAMUC requests that due to the shallow aquifer in this area that the applicant be required to install and maintain monitoring wells and agree to periodic testing, the results of which would be shared with interested parties.

Comment 33: No Citizen's Collection Station (CCS)

Christopher Jeremy Brecheisen indicated that the facility has no CCS.

ED's Response 33:

MSW rules do not require CCSs at transfer stations. CCSs are typically found as stand-alone collection points for individuals for whom no trash collection is provided, or at landfills to allow citizens to unload waste away from the active face, but in no situation is it required.

TAMUC's Response to Comment 33: At the public meeting, the applicant indicated that members of the local community would be allowed to utilize the transfer station directly for trash disposal. TAMUC requests that the ED confirm whether members of the general public will or will not be allowed to use the transfer station through a CCS or otherwise and provide a detailed response. If the applicant confirms that a CCS will be allowed, the ED should require the applicant to provide a detailed process of allowing a CCS and dealing with escaped refuse as a result of the CCS pursuant to TCEQ rules.[11]

Comment 35: Odor, Dust, Vapors, Methane, and Effect on Air Quality

Janet Anderson, Christy Andrzejewski, Christopher Babb, Travis Ball, Yumei Bao, Dave Bickley, Kathryn Brandt, Christopher Jeremy Brecheisen, James Brown, Ashley Bryan, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Amanda Delisle, Daryl Wayne Freelen, Stephen Gilcrest, David Alan Giles, Raymond Green, Bunny Harmon, Randy Harp, Richard Helge, Kelly Kuehl, Jonathan Manning, Barba McCord, Dustin McNeese, Mary Miller, Jessie Moore, Denise Morgan, Jared Mumm, Crystal Mumphrey, Jillian Nichols, Kayla Price, Mark Rudin, Amanda Scott, Nicholas Scott, Alison Soeder, Wendy Speight, Daniel Starks, Janis Stroope, Lynn Sutherland, Texas A&M University-Commerce, Elizabeth Tarrant, Keith Tarrant, Reabeccah Tarrant, Kevin Tibboel, and Cyrus Vaughan raised concerns about air quality, including odor, dust, vapor, and methane.

ED's Response 35:

Air pollution control is required by 30 TAC § 330.245. The specific air pollution control proposed by the Applicant is in Section 23 of Part IV in the Application. The Application indicates that, if the permit is granted, a minimum 50-foot buffer zone would be maintained and no waste loading, unloading, or processing would occur outside the building. Liquid and solid waste would be stored in odor-retaining containers and vessels. The tipping floor would be washed routinely. Ponding of water would not be allowed, including wash waters. If waste is stored overnight, it would be within the enclosed building.

Section 23 of the Application indicates that dust that may occur within the building will be controlled, as needed, by water sprays, mist systems, or similar methods. Roads will be asphalt or concrete, as shown on Figure III-1.3 in Part III of the Application.

Section 23 of the Application also indicates that air emissions would be controlled in accordance with current air permitting requirements and that appropriate authorizations under Chapter 116 or Chapter 330, Subchapter U would be obtained prior to operation.

Individuals are encouraged to report nuisance odors to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 35: At the public meeting, Dr. Jared Mumm provided commentary and referenced a TAMUC study finding that odors can impact animals in numerous

[11] *See* 30 TAC § 330.213

ways. TAMUC studies and performs research on animals and it is critical that detrimental impacts to those studies and animals do not occur. The ED's provision of a hotline to report issues is dismissive at best and at worst, disregards the years of animal program development TAMUC has cultivated over many decades. TAMUC's University Farm, which is directly across from the proposed site of the transfer station, has been in its location for more than 60 years. The applicant should not be allowed to establish a foreseeable nuisance adjacent to an established public use like a state funded institution of higher learning.[12] Odors are an inherent component of trash facilities and odors will be experienced by TAMUC and its animals.

Comment 36: Odor Control Chemicals

Kathryn Brandt was concerned about what odor-control chemicals would be used at the proposed facility.

ED's Response 36:

Section 23 of Part IV of the Application refers to a possible deodorizing system that could be utilized, if necessary. MSW rules require the applicant to describe any systems that will be utilized to control odors, but specific design information or material safety data sheets are not required as part of the application. Individuals are encouraged to report nuisance odors to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 36: TAMUC directs the ED to its response to Comment 35, above.

Comment 37: Vectors

Billy Rhea Beane, Dave Bickley, Kathryn Brandt, Noah Garcia, David Alan Giles, Kelly Kuehl, Jonathan Manning, Jared Mumm, and Lynn Sutherland stated that the transfer station would attract vectors, including rummaging animals.

ED's Response 37:

TCEQ's rules define a vector as an agent, such as an insect, snake, rodent, bird, or animal capable of mechanically or biologically transferring a pathogen from one organism to another. 30 TAC § 330.3(175). The breeding of vectors is a nuisance under 30 TAC § 330.3(97). The creation and maintenance of a nuisance is prohibited under 30 TAC § 330.15(a)(2).

As described in Part III, Section 2.3.2 of the Application, if the permit is issued, waste processing will occur within the transfer station on a concrete floor within a four-sided building with doors to enclose stored waste outside of processing hours. The concrete tipping floor will be washed down weekly, as required by 30 TAC § 30.243(a). Part III, Sections 2.3.3 and 4.2 of the Application

[12] *See Marvel Wells, Inc. v. Seelig Ct.*, 115 S.W.2d 1011 (Tex. Civ. App 1938)

clarify that contaminated water, including floor wash water, will be directed by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water dual-walled storage tank with an interstitial space for leak detection monitoring. The Executive Director has reviewed the application and preliminary determined that is satisfies the regulatory requirement regarding vector control. Individuals are encouraged to report nuisance conditions to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 37: Vectors are an acute threat and concern of TAMUC due to their ability to contaminate TAMUC's livestock programs and research. We understand that the tipping floor is washed down once a week, however, vectors may operate on a different timeframe and locate in areas concealed but in proximity with the transfer station. For example, vectors may live near the transfer station knowing that the mere presence of the transfer station will present opportunities for them to obtain sustenance. Whether the transfer station itself is the source of vectors or it provides a more suitable area where vectors may locate and propagate nearby, the presence of a transfer station 100 feet from TAMUC's livestock programs presents an unacceptable threat to TAMUC's offerings. It is unlikely that once vectors are identified that the hotline number provided by the ED will be of utility. TAMUC requests that the ED reconsider its recommendation by thoroughly assessing the requirements of 30 TAC § 330.7(8) & (9) in the context of 30 TAC § 330.61(h).

Comment 38: Windblown Waste and Waste on Roads

Travis Ball, Dave Bickley, Kathryn Brandt, James Brown, Ted Ray Crim, Sean Dawson, Armando Delacruz, Daryl Wayne Freelen, Diana Fults, David Alan Giles, Randy Harp, Jonathan Manning, Crystal Mumphrey, Mark Rudin, and Jill Wickersham were concerned about windblown waste. Travis Ball, Jeffrey Cross, Sean Dawson, Randy Harp, Jessie Moore, Nicholas Scott, Janis Stroope, Texas A&M University-Commerce, Reabeccah Tarrant, and Jill Wickersham indicated that there would be trash along the roads if the facility is authorized. Similarly, Nicholas Scott asked for details on how provisions for cleanup of waste along roadways would be enforced and what fines would be assessed.

ED's Response 38:

The facility is responsible for picking up litter scattered throughout the site, along fences and access roads, at the gate, and along and within the right-of-way of public access roads serving the facility for two miles from the entrance (including any waste illegally dumped within the right-of-way). The litter must be collected at least once a day on the days that the facility is in operation as specified in 30 TAC § 330.233 and 30 TAC § 330.235. Additionally, in accordance with 30 TAC § 330.235, the Applicant must take steps to encourage vehicles hauling waste to the facility to be enclosed or provided with a tarpaulin, net, or other means to effectively secure the load to prevent the escape of any part of the load by blowing or spilling. Sections 17 and 18 of Part IV of the Application address these requirements.

The Executive Director has reviewed the application and preliminarily determined that it satisfies the regulator requirements regarding windblown waste and litter. Individuals are encouraged to report nuisance conditions to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 38: The ED's response evinces a clear need for a supplemental agreement binding the applicant to ensure that trash lost from trucks approaching, entering, or exiting the transfer station is the responsibility of the applicant. Because the rules do not account for litter that falls outside of the parameters established by TCEQ rules, a comprehensive approach to litter management and meaningful penalties for failing to manage litter is critical to protect TAMUC's programs and adjacent properties. The rules clearly contemplate that "other suitable practices be employed to control windblown material."[13] More importantly, assuming that trash is identified with certainty to be within the distances and locations established by the rule, the rules do not establish a time frame within which the litter must be removed except that it must be "collected" at least once a day on days the facility is in operation. Livestock do not operate on time frames for refuse removal. From a practical standpoint then, TAMUC will be forced to remove immediately any litter that may come into reach of its livestock. Livestock rearing depends upon stewardship and requires immediacy of action that TCEQ rules fail to achieve or require of the applicant. The reality of the ED's adherence to TCEQ's rules in this instance results only in stray waste being the problem not of the applicant but of TAMUC and any others nearby who must protect their livestock not only "at least once a day" but at all times. Finally, TCEQ must require the applicant not just to "encourage vehicles hauling waste to the facility to be enclosed" but to ensure that no waste escapes that could be consumed by nearby livestock. Such specific requirements are authorized pursuant to 30 TAC § 330.7(8)&(9) and 330.103(5)(d)-(e).

Comment 39: Operating Hours

Kathryn Brandt and Jared Mumm indicated that proposed operating hours are excessive.

ED's Response 39:

In accordance with 30 TAC § 330.229(a), an application must include waste acceptance hours and operating hours for when the facility will transport materials on or off-site, as well as the hours for when a facility will operate heavy equipment. By rule, waste acceptance hours are from 7:00 a.m. to 7:00 p.m., Monday through Friday, and operating hours are from 5:00 a.m. to 9:00 p.m., Monday through Friday; however, the rule notes that other hours may be approved.

In Section 15 of Part IV of the Application, the Applicant has proposed waste acceptance hours from 5:00 a.m. to 6:00 p.m., Monday through Saturday, and operating hours from 4:00 a.m. to 7:00 p.m., Monday through Saturday. The Executive Director has received no information to justify restricting these proposed operating hours. If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800.

[13] *See* 30 TAC § 330.233(a)(1).

Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 39: If by rule "other hours may be approved," TAMUC requests that other hours be approved because the hours proposed by the applicant conflict with critical traffic going to and from TAMUC's facilities at hours that coincide with heavy truck traffic going to and from the sandpit and the proposed waste transfer station. TAMUC requests that TCEQ disapprove the application. If TCEQ approves the application, TAMUC requests that TCEQ require the trash trucks to utilize the transfer station during hours that do not conflict with TAMUC traffic. Further, TAMUC takes exception with the ED's claim that it has not received information to justify restricting these hours because TAMUC and others at the public meeting and in public comments have explained how the hours proposed by the applicant coincide with heavy uses of the highway by TAMUC and the general public. In addition, the noise from trucks going to and from the proposed transfer station site will disrupt animal sleeping patterns and their quality of life, which impacts TAMUC's related work. TCEQ rules allow for the ED to specify alternative operating hours and TAMUC requests that the ED do so in this matter.[14]

Comment 40: Fire, Firefighting Activities, and Volunteer Fire Department

Travis Ball, Dave Bickley, Kathryn Brandt, David Alan Giles, Randy Harp, Bobby Stovall, and Lynn Sutherland shared a concern for fires, particularly in consideration of a volunteer fire department that serves the community where the facility is proposed. Dave Bickley asked about runoff and emissions relating to fire fighting. Kathryn Brandt asked who would supply water at the facility and whether there would be an adequate supply.

ED's Response 40:

A Fire Protection Plan, as required under 30 TAC § 330.221(c), is provided in Section 11 of Part IV of the Application. The facility will have a water tank and a 100 gallon per minute pump to ensure that water will reach all parts of the tipping floor. The final sizing of the water tank will be determined after contacting the local fire marshal and in accordance with local fire codes at the time of construction. The facility must also meet any additional local fire codes. MSW rules do not require an application to provide the source of water for a proposed facility.

TAMUC's Response to Comment 40: TAMUC requests that the local fire marshal and local fire departments be contacted as a condition of any approval of the transfer station. It is important that the fire plan is one that has been recently updated to account for the changes inherent in the presence of the transfer station. In this instance, the fire plan accounts only for the safety of the transfer station itself and not the safety of the surrounding area, including TAMUC campus. TAMUC requests that as a condition of any approval that a comprehensive and area-specific fire plan be developed, implemented and regularly updated to ensure the safety of TAMUC and the other neighboring properties.

Comment 41: Dumping Outside Transfer Building

[14] 30 TAC § 330.229

Christopher Jeremy Brecheisen is concerned that waste dumping will occur outside the transfer building.

ED's Response 41:

Section 23 of Part IV of the Application states that no waste loading, unloading, or processing may occur outside the building. Additionally, the Draft Permit does not authorize outdoor waste storage or processing, other than a wastewater storage tank. The Draft Permit does not authorize any disposal of waste.

TAMUC's Response to Comment 41: The ED's response is unresponsive to Mr. Brecheisen's concern. TAMUC requests that the ED clarify what measures will be implemented to prevent waste dumping from occurring and what penalties and remedies are in place to prevent dumping, especially if the community is allowed to utilize the transfer station.

Comment 42: Visual Damage to Community

Jillian Nichols and James Wickersham indicated that the proposed facility would visually ruin the community.

ED's Response 42:

Section 20 of Part IV of the Application indicates that waste processing operations will be conducted within the transfer station building to minimize adverse visual impacts.

TAMUC's Response to Comment 42: The ED's response is unresponsive to the comment and concern expressed by Ms. Nichols and Mr. Wickersham. Further, whether waste processing operations occur within the building does not address the visual impacts of the building itself or the operations that take place outside of the building. TAMUC requests that the ED address representations of the applicant that trees, fences, etc., would be installed to eliminate the visibility of the transfer station as well as other means of ensuring that if the proposed transfer station is approved, that it will not negatively impact the views and visual environment. The ED should reconsider its recommendation and require the applicant to provide screening and other measures acceptable to TAMUC and other affected persons if the application is approved pursuant to TCEQ rules.[15]

Comment 43: 72-hour Waste Storage

Travis Ball indicated that allowing 72-hour storage of waste is excessive.

ED's Response 43:

---

[15] *See* 30 TAC § 330.239

The MSW rules do not limit waste storage time at this type of transfer stations but provide that these types of activities must not lead to nuisances, such as odor, vectors, or windblown waste. Parts I/II, Section 2.2.4 of the Application indicate that solid waste will generally be processed within 4 to 6 hours on average, but that maximum holding times on holidays or in the event of equipment breakdown will not exceed 72 hours. If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 43: TAMUC hosts large scale and heavily attended events that begin on Fridays during the summer and end the following week. During summer months, the Texas heat is certain to cause increased odors by decomposing the contents held within the transfer station. Because winds blow in the direction of TAMUC from the transfer station, it is certain that odors will impact TAMUC's events. While TAMUC appreciates the ED's provision of a hotline number in such events, it is unlikely that calling the hotline number on a hot Texas-summer Saturday will result in abatement of any nuisance caused by the transfer station until the following week—which could severely tarnish TAMUC events. TAMUC requests that as a condition of approval that TCEQ require fast-response assurances to address any immediate nuisances caused by the transfer station and requests that the ED specifically address this concern in its response.

Comment 45: Communities Served

Teresa Crow asked what counties the proposed facility would serve. Travis Ball, Ted Ray Crim, Jeffery Cross, Sean Dawson, and James Hudson noted that waste would be accepted from outside of Hunt County. Travis Ball indicated that the facility was too large for the community in which it would be located and so would be receiving waste from outside Hunt County.

ED's Response 45:

Parts I/II, Section 2.2.1 of the Application indicates that the facility will primarily serve Hunt County and surrounding communities. Subparagraph 30 TAC § 330.61(b)(1)(A) requires a brief description of the general sources and generation areas contributing waste to a proposed facility. The rules regulating transfer stations do not limit transfer stations to accept waste from only the county where the facility is located.

TAMUC's Response to Comment 45: The ED's response does not address the substance of the public comments and deflects to the contents of the application and the rules instead of verifying that the size of the proposed facility corresponds with the actual needs of the area. TAMUC requests that the ED specifically explain why this size of facility is needed and how the anticipated growth of the area over several decades justifies a facility of this size. TAMUC requests that the ED specifically address this concern in the context of the definition of "population equivalent," as defined in TCEQ rules.[16]

[16] *See* 30 TAC § 330.3(115).

Conclusion: An entire local and campus community is located in close proximity to the proposed transfer station. This community will be directly affected by the transfer station operations. TCEQ needs to go beyond the applicant's description of this community; TCEQ must evaluate the application's impact on this community as required by the rules. TAMUC respectfully requests that the Commission require this application to be processed not only based on the bare minimum information but also with consideration of the impact of this facility on the entire area under the totality of the circumstances, which the rules contemplate. TAMUC believes that the best way to achieve this is for the Commission to refer this matter to the State Office of Administrative Hearings and requests that such a referral be made and that a hearing on the merits be held.

Please direct all communications and documents for TAMUC to Mr. Travis Ball, Texas A&M University-Commerce, at (903) 886-5060 or Travis.Ball@tamuc.edu .

Sincerely,

Mark Rudin
President

Attachments

c: Office of General Counsel, The Texas A&M University System

ATTACHMENT A

Since 1889

November 11, 2021

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78735

Ms. Laurie Gharis
Chief Clerk
Office of Chief Clerk, MC 105
TCEQ
P.O. Box 13087
Austin, TX 78711-3087

Re: Application of Transfer Station Solutions, LLC for Municipal Solid Waste Facility Permit

Dear Deputy Director Fritz and Chief Clerk Gharis:

Texas A&M University–Commerce (University), joins the many other concerned members of the Commerce community in opposition to the application of Transfer Station Solutions, LLC (Applicant) for a municipal solid waste facility under Permit No. 2411. The proposed transfer station will be situated directly across State Highway 24 from certain University teaching and research classrooms and facilities and is unsuitable for an educational environment (See depictions attached). In addition, the University requests more information on the Applicant's plan for the transportation of the transferred waste from the proposed transfer station. The University is concerned that such transferred waste will be taken by tractor trailers from the proposed station north along State Highway 24 running directly adjacent to the main campus of the University in Commerce to the final waste disposal site, exacerbating the negative effects on the University. The University is in the process of assessing the overall impact that this facility would have to its campus community and will submit a more formal response detailing our apprehensions, and we wanted to register our complete concern over this proposed facility.

We are certain that allowing this project to proceed will result in at least the following issues:

1. Odors and noise that will impact the University's students, veterinary instruction facility, agricultural facility, animal facilities, and research projects;
2. Increased traffic directly across from the entrance to University facilities that will endanger those accessing these University facilities;
3. Visual impacts from the University, including from the upper levels of its campus buildings;

4. Negative impacts to the University's ability to recruit faculty and students and to promote its educational opportunities due to odors, visual impacts, noise and presence of stray trash;
5. Negative impacts on the University's to-be-constructed Agricultural Expo Facility to be located on the University's property approximately 2.4 miles north of this proposed site on State Highway 24 (See depiction attached); and
6. Potential impacts to the local water table and harm to the many local water wells.

The University has worked hard and invested significantly to create a special learning and research environment that is attractive to students, faculty and alumni alike. This environment, which is critical to a successful campus and contributes to the entire Commerce community, is directly threatened by the odors, noise, traffic and environmental impact of a solid waste facility in such close proximity. The University requests that it be considered a stakeholder in all considerations of this application given the University's property is within 300 feet of the entrance to the proposed facility. We request that a public meeting be scheduled so that students, staff and faculty may have an opportunity to provide you with their thoughts on the impact a municipal solid waste facility will have on the campus.

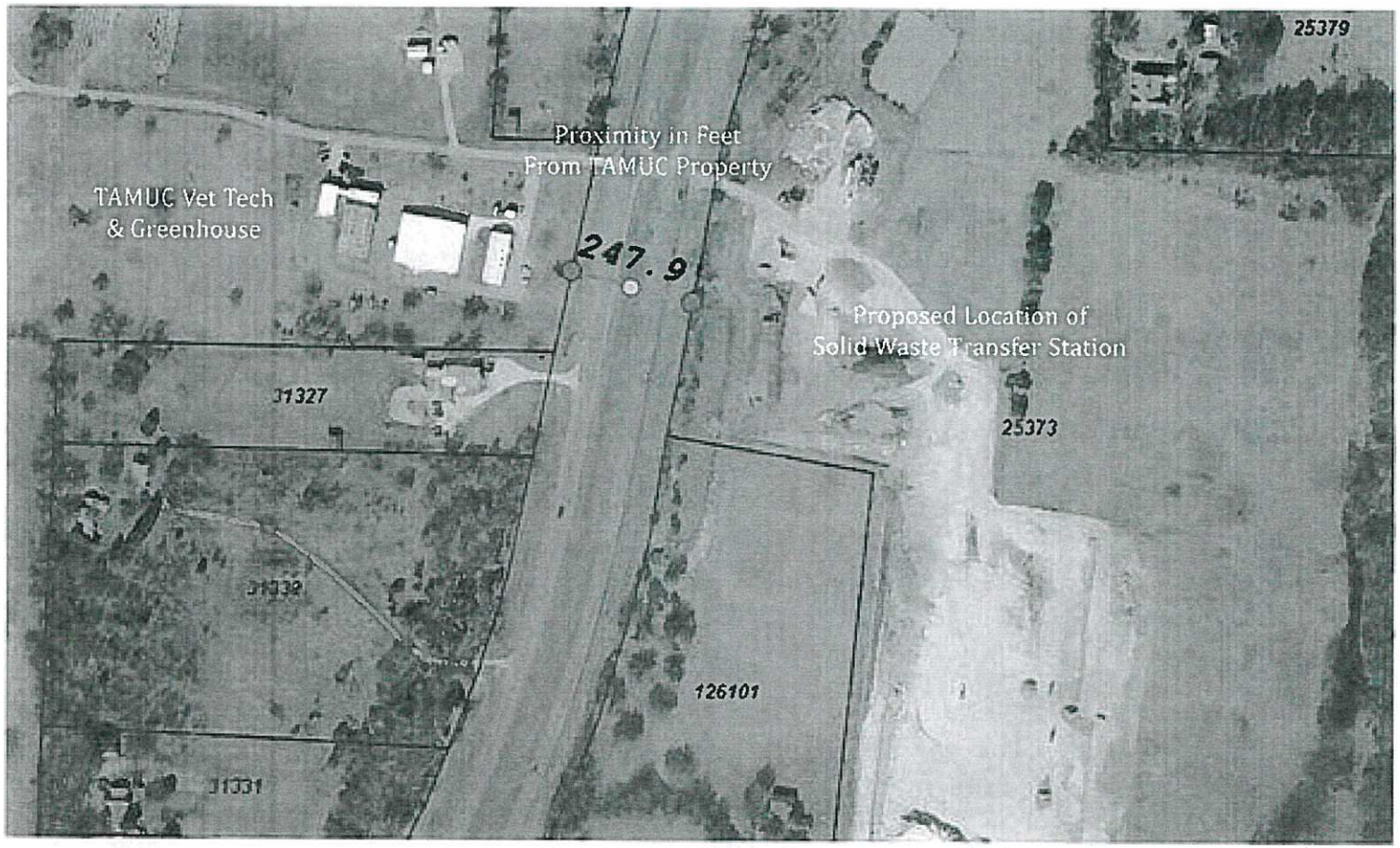
Thank you for your consideration of this important matter. Our contact for this matter will be Mr. Travis Ball, Texas A&M University-Commerce, at (903) 886-5060 or Travis.Ball@tamuc.edu.

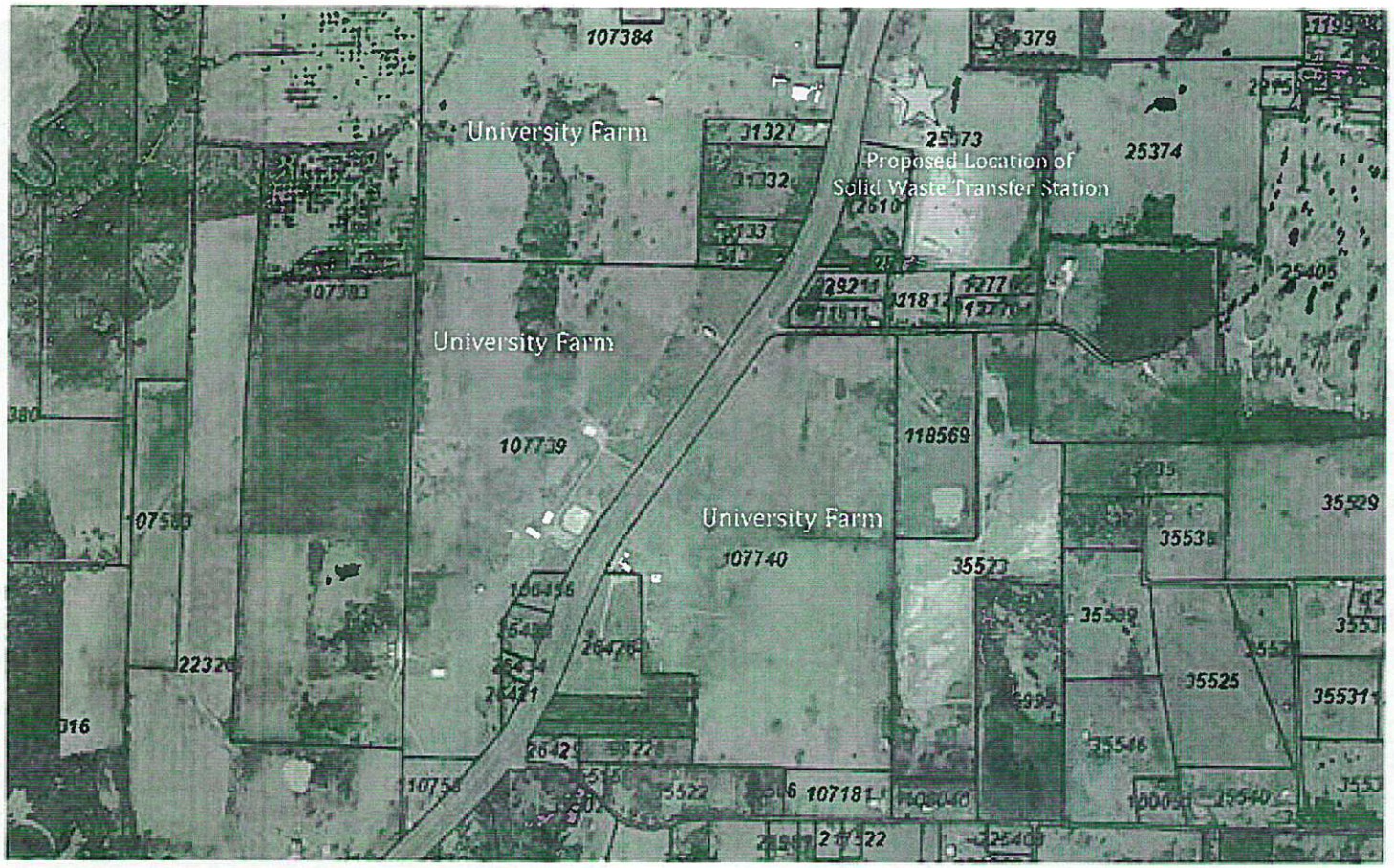
Sincerely,

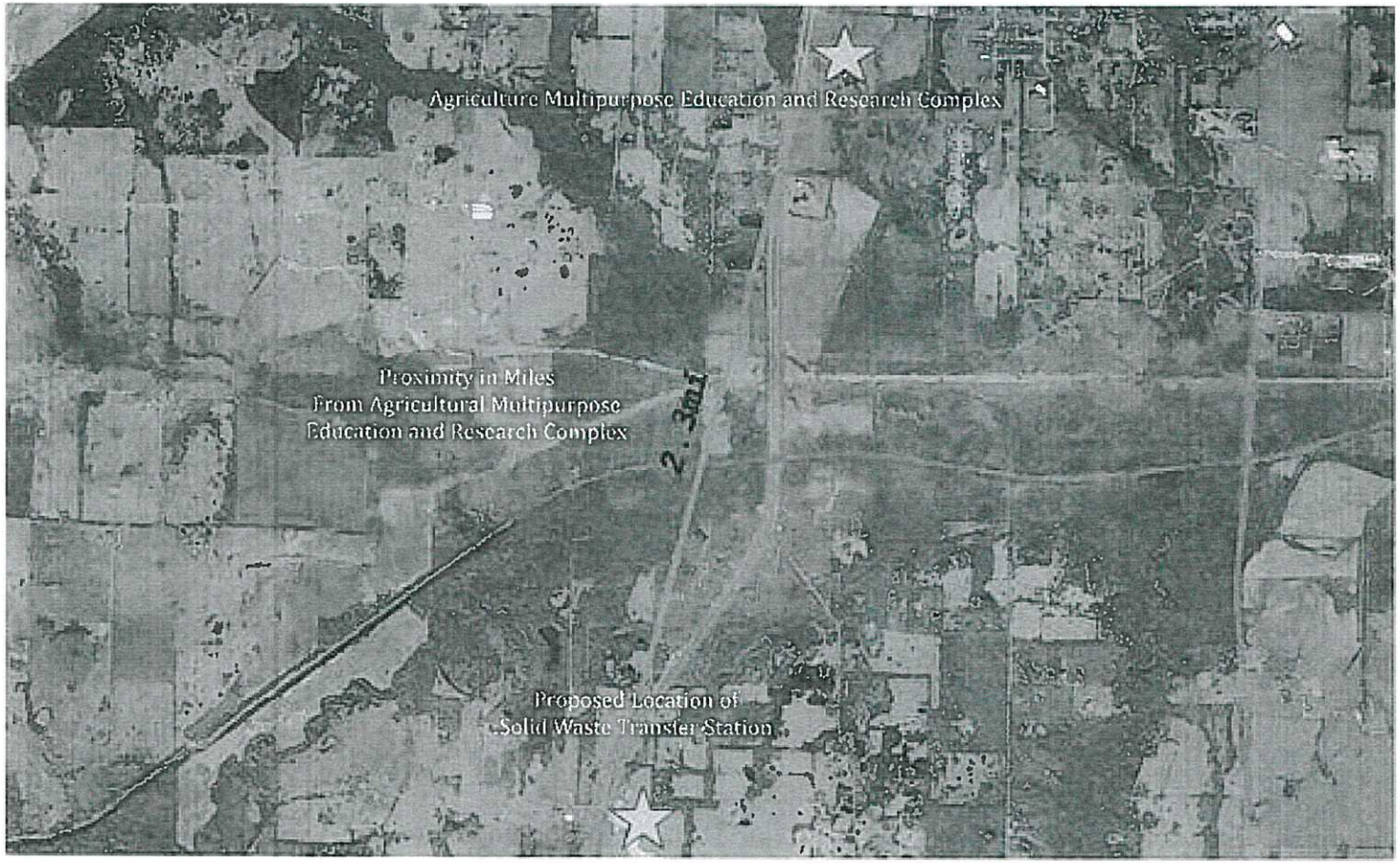
Mark Rudin
President

Attachments

c: Office of General Counsel, The Texas A&M University System


25379
Proximity in Feet
From TAMUC Property
TAMUC Vet Tech
& Greenhouse
247.9
Proposed Location of
Solid Waste Transfer Station
31327
25373
31329
126101
31331


University Farm
University Farm
University Farm
Proposed Location of
Solid Waste Transfer Station
107384
25374
118569
107740
107739
35529
35525
107181


Agriculture Multipurpose Education and Research Complex
Proximity in Miles
From Agricultural Multipurpose
Education and Research Complex
2.30mi
Proposed Location of
Solid Waste Transfer Station

ATTACHMENT B

Since 1889

April 28, 2022

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78738

Re: Application of Transfer Station Solutions, LLC for a Municipal Solid Waste Facility Permit – Additional Concerns and Request for a Contested Case Hearing on the Merits

Dear Deputy Director Fritz:

Texas A&M University–Commerce ("University") again writes to express its deep and continued opposition to the application submitted by Transfer Station Solutions, LLC (the "Applicant") for the construction of a municipal solid waste facility ("waste facility") under Permit No. 2411, to inform the Texas Commission on Environmental Quality (the "Commission") of additional issues and problems associated with the construction of this waste facility, and to request a contested case hearing on the merits to assess these issues and problems fully. The University is an affected party because its campus is located within 300 feet across the highway from the proposed location of the waste facility. Therefore, the University has legal rights and economic interests that would be impacted if the Commission approves this proposed waste facility.

The local community's opposition to the waste facility has been virtually unanimous. The community does not want this waste facility in this location. In December 2021, Hunt County even passed an ordinance prohibiting any future waste facilities without the express approval from Hunt County due to this waste facility application.[1] If this waste facility application were submitted to the Commission today, it could not be built unless Hunt County approved its construction irrespective of any approval from the Commission. Hunt County listened to its residents and acted. The University and the local community ask the Commission to do the same by at minimum, approving the application in an alternative location away from the University and the nearby residents.

Since the University filed its November 11, 2021, letter to the Commission, it has further explored the impacts of the proposed waste facility on its operations and the surrounding area. These impacts must be fully assessed, understood, and addressed prior to any final action on this waste facility. While the University does not believe reasonable accommodations for this waste facility are possible, at a minimum, the following issues must be assessed:

[1] *See* Ordinance Prohibiting Solid Waste Disposal in Hunt County, effective December 28, 2021 *available at* https://www.huntcounty.net/upload/page/8875/docs/PUBLIC%20NOTICE%20-%20Hunt%20County%20Landfill%20Regulations.pdf.

1. **Inadequate Opportunity for Participation.** The Applicant has already failed to be a "good neighbor" to the local community affected by the filing of its application. First, the Applicant opted not to conduct an optional pre-application meeting to inform and meet with the local community.[2] Second, the University offered for the April 28, 2022, public meeting to be held on campus so that students, faculty, and local residents could attend. Instead, the Applicant opted to have the public meeting at The Landmark on Lee Street in Greenville, which is over 20 miles away from the proposed location of the waste facility. This limits the ability of those most affected by this waste facility to express their concerns and hear from the Applicant. Many students and faculty have expressed concern to the University about this public meeting being in Greenville rather than Commerce and the difficulties this location presents to those who want to attend. The Commission must consider requiring another public meeting in a more convenient location—a location that is not 20 miles from the location of the proposed waste facility—so that all those impacted can have an opportunity to participate in this process, including the students of the University.

2. **Unacceptable Traffic Safety Risks.** The University has evaluated the challenges and safety issues associated with the increased truck traffic to and from the waste facility. In addition to the heavy traffic in the area, the University's analysis identified an average of over 70 vehicles per day traveling in front of the University's facilities near the waste facility at over 85 mph, with several in excess of 90 mph. With trucks already traveling in this area and the University's students, staff, and faculty forced to navigate the presence of additional large trucks associated with the waste facility, everyone who must travel to the University is endangered. If students and faculty of the University are required to share an intersection with the waste facility as proposed and the high volume of large trucks it will bring daily while simultaneously navigating the numerous accelerating and decelerating vehicles in the area, the potential for accidents rises to a high-risk level for the University community. The University recently needed to work with Texas Department of Transportation ("TXDOT") at another intersection in this area of State Highway 24 to provide new traffic control measures to address certain issues resulting from vehicles entering and exiting the University's facilities along State Highway 24. The addition of this transfer facility truck traffic will create another high traffic intersection used by University students, faculty and staff.

3. **Impact to University Research and Academic Offerings.** The University was created and is funded by Texas taxpayers to facilitate agricultural education and activities in the State of Texas. This waste facility will negatively impact the University's agricultural offerings. The University's College of Agricultural Sciences and Natural Resources has examined the likely impact of the waste facility to its current testing, operations, educational, research, and other agricultural offerings and is gravely concerned that this waste facility will limit its ability to continue its offerings without accommodations to staunch the impact of the waste facility. The University already has existing requirements and protections for trash container delivery and transit in place to avoid the impact trash collection noise and commotion has on University animal research activities. Similar noise and associated impacts from this neighboring transfer

[2] *See* 30 TAC §§ 39.501(b) and 330.53.

facility will need to be frequently assessed to determine what additional measures are necessary to counteract the negative effects of this waste facility to ongoing and future University research. Sudden noises add stress to an animal's environment and animal stress directly impacts animal health. The University cattle herd is particularly sensitive to stress triggers. It will be critical for the University to constantly assess how it will continue to maintain the levels of excellence it must offer given the presence of the waste facility. This examination will require extensive attention and resources by the University annually. The proposed location of the waste facility is in direct proximity to the University's agricultural research facilities where extensive animal research is performed annually. The University provides additional information (attached hereto as **Exhibit A**) to give the Commission a preliminary idea as to the impact of waste facilities on animal environments. Further, the University will need to conduct an exhaustive review of current and future grant applications and other funding requirements to identify whether the existence of the waste facility will complicate its ability to or disqualify it completely from continuing to receive or qualify for research funding due to the proximity of the waste facility stressors to its current and future animal operations.

4. **Property Valuation.** There are extensive studies (attached hereto as **Exhibit B**) assessing the impact of waste facilities like the proposed transfer station on nearby property values. It is critical that the Commission require further studies and analysis so that if it approves this waste facility, additional protections and accommodations to preserve community property values and the University's own property values are implemented. While there are various studies concerning the impact of waste facilities on residential property values, a thorough analysis of the impact of waste facilities on the University's property has not been performed. It will be critical to determine the impact of the waste facility on the University's property used for educational and research purposes —property it must preserve in trust on behalf of the people of Texas—now and over time.

5. **SOAH Issues.** Accordingly, the University respectfully requests that the Commission refer to the State Office of Administrative Hearings the issues listed on **Exhibit C** attached hereto.

Finally, student and faculty recruitment is an ongoing and challenging focus of the University. The University is concerned about its ability to grow, expand and attract students and faculty, and receive grants for research opportunities with a waste facility directly across from its campus. We look forward to a thorough review of these issues.

Sincerely,

Mark Rudin
President

EXHIBIT A
ANIMAL IMPACT STUDIES

1. Fernandez-Novo, Aitor., Perez-Garnelo, Sonia S., Villagra, Arantxa., Perez-Villalobos, Natividad., Astiz, Susana. 2020. The Effect of Stress on Reproduction and Reproductive Technologies in Beef Cattle—A Review. Animals.

2. Broucek. 2014. Effect of noise on performance, stress and behavior of animals. Slovak J. Anim. Sci.

3. Phil M. Urso, Abe Turgeon, Flavio R. B. Ribeiro, Zachary K. Smith & Bradley J. Johnson (2021) Review: the effects of dust on feedlot health and production of beef cattle, Journal of Applied Animal Research, 49:1, 133-138, DOI: 10.1080/09712119.2021.1903476

EXHIBIT B
STUDIES ON IMPACT OF WASTE FACILITES ON SURROUNDINGS

1. BBC Research & Consulting, *Potential Impacts of Proposed Waste Transfer Station near Carbondale*, November 26, 2012.

EXHIBIT C
LIST OF ISSUES FOR REFERAL TO THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

1. The Applicant has not sufficiently demonstrated that the proposed transfer station meets the ventilation and air pollution control requirements required under 30 TAC §§ 330.209, or 330.245; nor that the operation of the proposed transfer station will not result in noise, odors, or other nuisances under §§ 330.15 and 330.233, impacting the University community, surrounding community, wildlife, or agricultural uses in the vicinity.

2. The Applicant has not sufficiently demonstrated that the management and operation of the proposed transfer station meets the requirements under 30 TAC §§ 330.203, 330.205, 330.215, and 330.249.

3. The Applicant has not demonstrated that it has sufficient competency to operate the proposed transfer station given the unique nature of the surrounding area as required under 30 TAC § 330.59.

4. The Applicant has not demonstrated that the proposed transfer station is a compatible land use in light of the concerns raised by the university and the local community as required under 30 TAC § 330.61.

5. The Applicant has not demonstrated that the proposed accommodations for the use of the roads and the intersection in the vicinity of the transfer station adequately accommodate the needs of the transfer station and those of the current and future surrounding community as required under 30 TAC § 330.61.

6. The Applicant has not demonstrated that the proposed transfer station will not cause the endangerment of human health, welfare, or the environment as is prohibited under 30 TAC §§ 330.15(a)(3) or 330.221.

7. The Applicant has not demonstrated that it will implement adequate waste screening measures for identification and removal of hazardous or flammable wastes that could endanger the University, its buildings, its agricultural programs, and the surrounding community and neighborhoods as required under 30 TAC §§ 330.203 and 330.241.

8. The Applicant has not demonstrated adequate wetlands delineation nor has it adequately addressed potential impacts to nearby wetlands or ponds as required under 30 TAC §§ 330.61, 330.63, and 330.547.

9. The Applicant has not sufficiently demonstrated that the proposed transfer station will adequately protect the aquifer, which is shallow and permeable, or the local groundwater for the surrounding community as required under 30 TAC §§ 330.63, 33.207, 330.303, and 330.401-403.

10. The Applicant has not demonstrated that the proposed operating hours for the proposed transfer station will not impact the various operations of the University, including agricultural operations, as required under 30 TAC § 330.229.

11. The Applicant cannot meet the requirements of 30 TAC § 330.231 without negatively impacting the campus environment and violating 30 TAC § 330.239. Further, the Applicant has failed to provide signage in Spanish as required by the Commission.

12. The Applicant has not demonstrated that the proposed transfer station will not negatively impact local residential, commercial, agricultural, or educational institution property values.

13. The Applicant has not demonstrated that the proposed transfer station will actually decrease alleged "illegal dumping" in the area.

14. The Applicant has not demonstrated that if citizens are allowed to access the transfer station to dispose of waste, that the roads to and in the vicinity of the waste facility can safely accommodate the additional traffic.

15. The University requests that the Commission reconsider the Executive Director's "technically complete" determination.

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Monday, September 26, 2022 7:37 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: tceq 0 22 sept. 20223.docx

RFR

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Friday, September 23, 2022 2:32 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. David Giles

EMAIL: dgiles@gilesgroup.net

COMPANY:

ADDRESS: 3714 STATE HIGHWAY 24
CAMPBELL TX 75422-1294

PHONE: 8173662026

FAX:

COMMENTS: see attached comments

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Response to TCEQ Executive Director's Opinion
Permit 2411

I am an "affected party" and a citizen of Hunt County, Texas. I live at 3714 State Highway 24 in Campbell, Texas. As defined in the TCEQ letter of 24 August 2022, I am submitting a **request for re-consideration of the Executive Director's decision**. The basis for my request is detailed below:

Issue #1 -- Location of the Public Meeting

1. THE TCEQ Executive Director failed to ensure that the people most closely involved with this proposed facility had an opportunity to participate. Student, faculty and staff were put at a disadvantage by the TCEQ Executive Director's decision to host the community event in Greenville. This action precluded concerned citizens on a limited income and university students from being able to participate. TCEQ had the unilateral power, authority and discretion to set the sight of the meeting. TCEQ Executive Director's decision reflects his bias toward the permit applicant.

Issue #2 – Review of the Proposed Site

1. TCEQ's review and survey of the proposed site was not made public, nor did TCEQ reference their site inspection during the public meeting. TCEQ Executive Director was not transparent in their site assessment.

Issue #5 – Application Review

1. The only standard embraced by the TCEQ is whether or not the permit application meets the "rules."
    a. TCEQ cannot point to where it consulted with independent sources to verify the claims and representations made by the petitioner.
    b. TCEQ's review relies exclusively upon representations made by the applicant, which can be biased and partisan.
    c. By failing to seek independent verification of representations and claims, TCEQ is, in fact, "rubber-stamping" the application process.
2. TCEQ is abandoning its obligation to protect the Texas environment and the citizens of the state of Texas. Replacing TCEQ with a computer-generated set of forms that permit applicants can complete would streamline the application process and be a more efficient use of Texas taxpayers' funds.
    a. Just because a facility can be built; DOES NOT ANSWER the question of whether it SHOULD BE BUILT.

Issue #6 – Effect on Property Values and Local Tax Revenue

1. TCEQ Executive Director is hiding behind arguments that it does not have jurisdiction. In doing so, TCEQ is abandoning its moral and ethical obligations to the citizens of this county and state.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #10 – Environmental Impact Study

1. TCEQ is endangering the environment and the citizens of this state by relying upon the sole of the representations and claims made by self-serving permit applicants. Failure to perform and objectively consider the potential environmental impact is reckless, imprudent, and borders on dereliction of duties.

Issue #12 --- Traffic and Roads

1. TCEQ's response to this issue blatantly ignores the potential risk that this proposed facility creates. The road that serves this area is posted for 75 mph. Because this road does not have effective enforcement, most traffic travels at speeds in excess of 80 to 85 mph.
2. This road is traveled by commuter students headed to or from classes.
   a. TCEQ Executive Director intentionally ignored the presentation and discussion that occurred during the community meeting regarding the configuration of the highway in front of the proposed facility.
   b. The overhead photographs presented at the community meeting clearly shows significant curves that limit the sight and potential reaction time for drivers traveling the speed limit or above to reaction to slow-moving garbage haulers.
   c. The cross-over points at this facility are inadequate to permit an 18-wheeler to cross safely.
3. The traffic on this road has increased exponentially in recent years. This increase is expected to continue in the next few years.
4. The inescapable fact is that TCEQ is authorizing the facility to be built and operated by allowing this permit to proceed.
   a. The facility's existence and operation constitute a significant safety risk and hazard to the citizens that travel on this road.
   b. Allowing this permit to be approved will make TCEQ complicit in whatever accidents and deaths occur on this patch of ground. Make no mistake, the blood and death that will inevitably occur on this highway in front of the facility that you approve will belong to TCEQ.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #13 00 Negative Impact on Community

1. If TCEQ is jurisdictionally prohibited from considering social and economic impact, then please explain why the state of Texas needs to have your organization.
2. TCEQ again relies on a "ground survey" in the application. TCEQ fails in its duties to the citizens of this state by not seeking independent surveys and statistical data.
3. The Executive Director fails to cite the basis for the decision that "adequate information on growth trends" was provided in the application.
    a. Growth plans outlined by the Greenville Chamber of Commerce and the Hunt County Legislative Task Force present a much different picture of economic growth than outlined in the permit application.
    b. TCEQ is remiss and derelict in not even attempting to secure and consider objective economic and social growth trend data. These data are publically available if TCEQ desires accurate data.

Issue #15 – Land Use Compatibility

1. TCEQ Executive Director fails to consider the private property, commercial business operations, and the presence of a major state-supported university with significant agriculture research d related functions. These facilities are currently established; others are being planned.
2. TCEQ Executive Director fails to recognize the rights of these citizens and organizations.

Issue #18 – Effects on Texas A&M University-Commerce

1. TCEQ Executive Director flagrantly ignores the statements made regarding the devastating effects this proposed facility would have upon its agricultural research and related agricultural operations.
2. The Executive Director fails to provide objective or scientific facts to support the claims that such a facility would not harm the university's interests.
3. The Executive Director fails to justify how permitting the construction of this proposed facility would not harm the traveling public, students, facility, and staff of this university.
4. State Highway 24 is the "Gateway Access" to the university. Almost everyone traveling to the university must travel down this road. The construction of a facility where 1,000 tons per day of solid waste is being transported is imprudent and deliberatively reckless.
    a. The net impact of TCEQ's Executive Director is to sanction the invalidation and debase of a regional academic institution.

5. TCEQ's Executive Director is remiss in not defining the review process made by TCEQ in determining that the proposed facility would not compromise the health and safety of the students, faculty, and staff at Texas A&M University-Commerce.

Issue #19 – Location

1. See the comments cited in Issue #12

Issue #21 – Effects on Soil Quality, Agriculture, and Vegetation

1. TCEQ's Executive Director is silent about how TCEQ intends to monitor and enforce (consequences) unpermitted discharges of contaminated water.
2. TCEQ's Executive Director fails to require the permit applicant to demonstrate how "liquids that are released from the waste will be managed as contaminated water."
    a. TCEQ's Executive Director fails to state how TCEQ will discern and monitor these activities.

Issue #22 Environmental Injustice

1. TCEQ's Executive Director fails to address the concerns of Kayla Price and Nicholas Scott that TCEQ is failing to protect human health and the environment.
2. TCEQ's Executive Director fails to provide any objective or scientifically established publications that assert to the citizens of the state of Texas that socioeconomic and racial status variables have been considered and objectively evaluated.
3. "Just because, "you say so" does not make it so."

Comment #23 – Waste Acceptance

1. TCEQ's Executive Director is remiss in not mandating that the permit applicant articulate a protocol for screening and preventing unacceptable waste (hazardous waste, PCBs, radioactive, asbestos-containing materials, and liquid waste) from entering the proposed transfer station.
2. TCEQ's Executive Director is remiss for not establishing consequences for any violations of the screening of and permitting unacceptable waste (hazardous waste, PCBs, radioactive, asbestos-containing materials, and liquid waste) to enter the transfer station.
3. TCEQ's Executive Director is remiss for not establishing a reporting structure that publically presents the proposed transfer station's performance and designating a person to enforce the operations of the proposed transfer station.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #26 – Effect on Students in the Campbell ISD

1. TCEQ's Executive Director is remiss in not defining the review process made by TCEQ in determining that the proposed facility would not compromise the health and safety of the students of Campbell ISD.

Issue 28 & 29 --- Contaminated Water Management & Surface Water

1. TCEQ's Executive Director is silent as to the ways TCEQ intends to monitor and enforce (consequences) unpermitted discharges of contaminated water.
2. TCEQ's Executive Director fails to require the permit applicant to demonstrate how "liquids that are released from the waste will be managed as contaminated water."
    a. TCEQ's Executive Director fails to state how TCEQ will discern and monitor these activities.

Issue #30

1. This is a matter of "Cause & Effect." If TCEQ authorized the construction of the proposed facility, then TCEQ should bear the cost of monitoring the safety of the drinking water of the surrounding residents.
2. TCEQ's Executive Director is remiss in not establishing some form of monitoring system to ensure the safety of the drinking water for the surrounding residents.
3. TCEQ's Executive Director is remiss in not investigating the size and depth of the area's underground aquifer. Failure to exercise reasonable and prudent investigation is negligence and more than a flagrant disregard for health and safety – it is an unacceptable indifference characterized by lassitude and languor.

Issue #31 – Two-Sided Building

1. TCEQ's Executive Director is remiss in not mandating that a 4-side building be constructed.
2. TCEQ's Executive Director is remiss for not using his authority to protect the interests of Texans

Issue #32 – Incineration & Other "Add-Ons"

1. TCEQ's Executive Director is remiss in not specifying how "add-ons' will be monitored and sanctioned by TCEQ

Issue #35 – Air Quality

1. TCEQ's Executive Director is remiss in not mandating that the permit applicant devise a system for monitoring and correcting any significant variations in the air quality (Specifically, cancer-causing air particles and nuisance odors).

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #36 – Odor Control

1. TCEQ's Executive Director is remiss for not mandating that the permit applicant monitor odors.
2. TCEQ's Executive Director is remiss for not developing and/or mandating that the permit applicant develop a system to ensure the air quality is safe and free of odros.
2. TCEQ's Executive Director is remiss for not specifying the corrective steps to be expected by TCEQ if odors constitute a problem for the surrounding residents and business operators.

Issue #37 -- Vectors

1. TCEQ's Executive Director is remiss for not explicitly addressing the issues raised in this topic. TCEQ's Executive Director intentionally avoids the topic by repeatedly stating the design characteristics of the proposed facility. TCEQ's Executive Director's response dodges and sidesteps the reality that vectors are inevitable, especially when 1,000 tons of solid waste per day are being brought into a facility.
2. In essence, TCEQ's response is NO RESPONSE – simply because there is no plan for containing vectors.
3. The January 17, 2020 article in PUBLIC HEALTH points out that it examines the research gaps in the "vicious cycle of solid waste, disease vectors, and poverty." The results affirm that "Urban biological vector-borne diseases, especially Aedes-borne diseases, are associated with solid waste accumulation." The article describes how these vectors "create burrowing sites and food reservoirs" in waste facilities.
4. TCEQ's Executive Director is remiss for not designing a system of robust epidemiological measurements of this proposed facility.
5. TCEQ's Executive Director is remiss for not proposing a framework for solution-based research of this facility and other such facilities around the state of Texas.

Issue #40 – Fire, Fire-Fighting Activities

1. TCEQ's Executive Director is remiss for not requiring that this permit applicant – or that any permit applicant in the future not demonstrate that an adequate supply of water exists to contain and extinguish a facility fire – whether that fire was "expected" or "unexpected.
    a. TCEQ should mandate that critical event response times be formulated and that critical response teams be training in how to prevent out of control fires.

b. TCEQ should mandate that critical event response times be formulated and that critical response teams be training in how to respond to natural disasters, including flooding, tornados, power surges., etc.

2. TCEQ's Executive Director is remiss for not requiring that the permit applicant demonstrate the amount of water and water pressure needed to extinguish a facility fire.

3. TCEQ's Executive Director is remiss for not requiring that this condition be met before approval.

4. TCEQ's Executive Director is remiss not protecting the citizens, businesses, wildlife, people and property of the surrounding area.

Issue #43 – 72-Hour Waste Storage

1. TCEQ's Executive Director is remiss for not adhering to the standards that the facility "must not lead to nuisances, such as odors, vectors or windblown waste." Permitting over 1,000 tons of solid waste to be exposed to 72 hours of hot Texas sun – with temperatures in excess of 105 degrees and not expecting odors and vectors is ludicrous or borders of mental delusions.

2. TCEQ's Executive Director is remiss in offering the community the solution of reporting such "nuisances" of writing the matter to Region 4 TCEQ Office, which is located 95 miles away (2 hours by car) in Fort Worth is frankly offensive and insulting. TCEQ's Executive Director's response to this issue is both debasing and humiliating.

Issue #47 – Individual Rights

1. TCEQ's Executive Director is remiss in not grasping the importance of Mr. Brecheisen's comments. TCEQ's apparent disregard for individual rights is simply disrespectful, especially since most TCEQ's are based on biased, self-serving statements from the permit applicant.

2. TCEQ Executive Director's opinions are in direct opposition to community members, School Board members and School Board Superintendents, Community Bank officers, academic professors, university Deans, a university President, as well as the Hunt County Judge and County Commissioner, as well as representatives from state representative both state senator offices.

3. The TCEQ Executive Director's opinion directly opposes a community comprised of people, businesses, schools, universities and others that do not want this facility on State Highway 24.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

4. It is obvious that Mr. Bray is using the land and resources of Hunt County to further enrich his personal wealth. His actions are tantamount to a rape and plundering of the land, as well as despoiling the quality life of people who live and work in this community.

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Monday, September 26, 2022 7:24 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Response to the TCEQ Executive Director's Opinion - Permit 2411
Attachments: tceq 0 22 sept. 2022.docx

RFR

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Monday, September 26, 2022 7:15 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: Response to the TCEQ Executive Director's Opinion - Permit 2411

From: Dr. Dave Giles <dgiles@gilesgroup.net>
Sent: Friday, September 23, 2022 2:22 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Cc: Jeremy Brecheisen <cbreche@yahoo.com>; Jon Manning <jemanningdvm@gmail.com>; David A. Giles <dgiles@gilesgroup.net>
Subject: Response to the TCEQ Executive Director's Opinion - Permit 2411

Attached is my request for reconsideration of the Executive Director's decision regarding Permit 2411.

Dave Giles, Ph.D.
Rancho Giles
3714 Texas 24
Flying Tiger Memorial Highway
Campbell, Texas 75422
817-366-2026

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail dgiles@gilesgroup.net delete the message.

Begin forwarded message:

From: "Nautica" <nautica@eml.nautica.com>

Subject: An Extra 10% Off just for you!
Date: September 23, 2022 at 8:54:51 AM CDT
To: <dgiles@gilesgroup.net>
Reply-To: "Nautica" <reply-fef91575736002-340_HTML-21597532-515011049-230@eml.nautica.com>

Save on these must-haves styles perfect for you
Web Version

MEN WOMEN KIDS HOME SUSTAINABLY CRAFTED CLEARANCE

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Response to TCEQ Executive Director's Opinion
Permit 2411

I am an "affected party" and a citizen of Hunt County, Texas. I live at 3714 State Highway 24 in Campbell, Texas. As defined in the TCEQ letter of 24 August 2022, I am submitting a **request for re-consideration of the Executive Director's decision**. The basis for my request is detailed below:

Issue #1 -- Location of the Public Meeting

1. THE TCEQ Executive Director failed to ensure that the people most closely involved with this proposed facility had an opportunity to participate. Student, faculty and staff were put at a disadvantage by the TCEQ Executive Director's decision to host the community event in Greenville. This action precluded concerned citizens on a limited income and university students from being able to participate. TCEQ had the unilateral power, authority and discretion to set the sight of the meeting. TCEQ Executive Director's decision reflects his bias toward the permit applicant.

Issue #2 – Review of the Proposed Site

1. TCEQ's review and survey of the proposed site was not made public, nor did TCEQ reference their site inspection during the public meeting. TCEQ Executive Director was not transparent in their site assessment.

Issue #5 – Application Review

1. The only standard embraced by the TCEQ is whether or not the permit application meets the "rules."
    a. TCEQ cannot point to where it consulted with independent sources to verify the claims and representations made by the petitioner.
    b. TCEQ's review relies exclusively upon representations made by the applicant, which can be biased and partisan.
    c. By failing to seek independent verification of representations and claims, TCEQ is, in fact, "rubber-stamping" the application process.
2. TCEQ is abandoning its obligation to protect the Texas environment and the citizens of the state of Texas. Replacing TCEQ with a computer-generated set of forms that permit applicants can complete would streamline the application process and be a more efficient use of Texas taxpayers' funds.
    a. Just because a facility can be built; DOES NOT ANSWER the question of whether it SHOULD BE BUILT.

Issue #6 – Effect on Property Values and Local Tax Revenue

1. TCEQ Executive Director is hiding behind arguments that it does not have jurisdiction. In doing so, TCEQ is abandoning its moral and ethical obligations to the citizens of this county and state.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #10 – Environmental Impact Study

1. TCEQ is endangering the environment and the citizens of this state by relying upon the sole of the representations and claims made by self-serving permit applicants. Failure to perform and objectively consider the potential environmental impact is reckless, imprudent, and borders on dereliction of duties.

Issue #12 --- Traffic and Roads

1. TCEQ's response to this issue blatantly ignores the potential risk that this proposed facility creates. The road that serves this area is posted for 75 mph. Because this road does not have effective enforcement, most traffic travels at speeds in excess of 80 to 85 mph.
2. This road is traveled by commuter students headed to or from classes.
   a. TCEQ Executive Director intentionally ignored the presentation and discussion that occurred during the community meeting regarding the configuration of the highway in front of the proposed facility.
   b. The overhead photographs presented at the community meeting clearly shows significant curves that limit the sight and potential reaction time for drivers traveling the speed limit or above to reaction to slow-moving garbage haulers.
   c. The cross-over points at this facility are inadequate to permit an 18-wheeler to cross safely.
3. The traffic on this road has increased exponentially in recent years. This increase is expected to continue in the next few years.
4. The inescapable fact is that TCEQ is authorizing the facility to be built and operated by allowing this permit to proceed.
   a. The facility's existence and operation constitute a significant safety risk and hazard to the citizens that travel on this road.
   b. Allowing this permit to be approved will make TCEQ complicit in whatever accidents and deaths occur on this patch of ground. Make no mistake, the blood and death that will inevitably occur on this highway in front of the facility that you approve will belong to TCEQ.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #13 00 Negative Impact on Community

1. If TCEQ is jurisdictionally prohibited from considering social and economic impact, then please explain why the state of Texas needs to have your organization.
2. TCEQ again relies on a "ground survey" in the application. TCEQ fails in its duties to the citizens of this state by not seeking independent surveys and statistical data.
3. The Executive Director fails to cite the basis for the decision that "adequate information on growth trends" was provided in the application.
    a. Growth plans outlined by the Greenville Chamber of Commerce and the Hunt County Legislative Task Force present a much different picture of economic growth than outlined in the permit application.
    b. TCEQ is remiss and derelict in not even attempting to secure and consider objective economic and social growth trend data. These data are publically available if TCEQ desires accurate data.

Issue #15 – Land Use Compatibility

1. TCEQ Executive Director fails to consider the private property, commercial business operations, and the presence of a major state-supported university with significant agriculture research d related functions. These facilities are currently established; others are being planned.
2. TCEQ Executive Director fails to recognize the rights of these citizens and organizations.

Issue #18 – Effects on Texas A&M University-Commerce

1. TCEQ Executive Director flagrantly ignores the statements made regarding the devastating effects this proposed facility would have upon its agricultural research and related agricultural operations.
2. The Executive Director fails to provide objective or scientific facts to support the claims that such a facility would not harm the university's interests.
3. The Executive Director fails to justify how permitting the construction of this proposed facility would not harm the traveling public, students, facility, and staff of this university.
4. State Highway 24 is the "Gateway Access" to the university. Almost everyone traveling to the university must travel down this road. The construction of a facility where 1,000 tons per day of solid waste is being transported is imprudent and deliberatively reckless.
    a. The net impact of TCEQ's Executive Director is to sanction the invalidation and debase of a regional academic institution.

5. TCEQ's Executive Director is remiss in not defining the review process made by TCEQ in determining that the proposed facility would not compromise the health and safety of the students, faculty, and staff at Texas A&M University-Commerce.

Issue #19 – Location

1. See the comments cited in Issue #12

Issue #21 – Effects on Soil Quality, Agriculture, and Vegetation

1. TCEQ's Executive Director is silent about how TCEQ intends to monitor and enforce (consequences) unpermitted discharges of contaminated water.
2. TCEQ's Executive Director fails to require the permit applicant to demonstrate how "liquids that are released from the waste will be managed as contaminated water."
    a. TCEQ's Executive Director fails to state how TCEQ will discern and monitor these activities.

Issue #22 Environmental Injustice

1. TCEQ's Executive Director fails to address the concerns of Kayla Price and Nicholas Scott that TCEQ is failing to protect human health and the environment.
2. TCEQ's Executive Director fails to provide any objective or scientifically established publications that assert to the citizens of the state of Texas that socioeconomic and racial status variables have been considered and objectively evaluated.
3. "Just because, "you say so" does not make it so."

Comment #23 – Waste Acceptance

1. TCEQ's Executive Director is remiss in not mandating that the permit applicant articulate a protocol for screening and preventing unacceptable waste (hazardous waste, PCBs, radioactive, asbestos-containing materials, and liquid waste) from entering the proposed transfer station.
2. TCEQ's Executive Director is remiss for not establishing consequences for any violations of the screening of and permitting unacceptable waste (hazardous waste, PCBs, radioactive, asbestos-containing materials, and liquid waste) to enter the transfer station.
3. TCEQ's Executive Director is remiss for not establishing a reporting structure that publically presents the proposed transfer station's performance and designating a person to enforce the operations of the proposed transfer station.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #26 – Effect on Students in the Campbell ISD

1. TCEQ's Executive Director is remiss in not defining the review process made by TCEQ in determining that the proposed facility would not compromise the health and safety of the students of Campbell ISD.

Issue 28 & 29 --- Contaminated Water Management & Surface Water

1. TCEQ's Executive Director is silent as to the ways TCEQ intends to monitor and enforce (consequences) unpermitted discharges of contaminated water.
2. TCEQ's Executive Director fails to require the permit applicant to demonstrate how "liquids that are released from the waste will be managed as contaminated water."
    a. TCEQ's Executive Director fails to state how TCEQ will discern and monitor these activities.

Issue #30

1. This is a matter of "Cause & Effect." If TCEQ authorized the construction of the proposed facility, then TCEQ should bear the cost of monitoring the safety of the drinking water of the surrounding residents.
2. TCEQ's Executive Director is remiss in not establishing some form of monitoring system to ensure the safety of the drinking water for the surrounding residents.
3. TCEQ's Executive Director is remiss in not investigating the size and depth of the area's underground aquifer. Failure to exercise reasonable and prudent investigation is negligence and more than a flagrant disregard for health and safety – it is an unacceptable indifference characterized by lassitude and languor.

Issue #31 – Two-Sided Building

1. TCEQ's Executive Director is remiss in not mandating that a 4-side building be constructed.
2. TCEQ's Executive Director is remiss for not using his authority to protect the interests of Texans

Issue #32 – Incineration & Other "Add-Ons"

1. TCEQ's Executive Director is remiss in not specifying how "add-ons' will be monitored and sanctioned by TCEQ

Issue #35 – Air Quality

1. TCEQ's Executive Director is remiss in not mandating that the permit applicant devise a system for monitoring and correcting any significant variations in the air quality (Specifically, cancer-causing air particles and nuisance odors).

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #36 – Odor Control

1. TCEQ's Executive Director is remiss for not mandating that the permit applicant monitor odors.
2. TCEQ's Executive Director is remiss for not developing and/or mandating that the permit applicant develop a system to ensure the air quality is safe and free of odros.
2. TCEQ's Executive Director is remiss for not specifying the corrective steps to be expected by TCEQ if odors constitute a problem for the surrounding residents and business operators.

Issue #37 -- Vectors

1. TCEQ's Executive Director is remiss for not explicitly addressing the issues raised in this topic. TCEQ's Executive Director intentionally avoids the topic by repeatedly stating the design characteristics of the proposed facility. TCEQ's Executive Director's response dodges and sidesteps the reality that vectors are inevitable, especially when 1,000 tons of solid waste per day are being brought into a facility.
2. In essence, TCEQ's response is NO RESPONSE – simply because there is no plan for containing vectors.
3. The January 17, 2020 article in PUBLIC HEALTH points out that it examines the research gaps in the "vicious cycle of solid waste, disease vectors, and poverty." The results affirm that "Urban biological vector-borne diseases, especially Aedes-borne diseases, are associated with solid waste accumulation." The article describes how these vectors "create burrowing sites and food reservoirs" in waste facilities.
4. TCEQ's Executive Director is remiss for not designing a system of robust epidemiological measurements of this proposed facility.
5. TCEQ's Executive Director is remiss for not proposing a framework for solution-based research of this facility and other such facilities around the state of Texas.

Issue #40 – Fire, Fire-Fighting Activities

1. TCEQ's Executive Director is remiss for not requiring that this permit applicant – or that any permit applicant in the future not demonstrate that an adequate supply of water exists to contain and extinguish a facility fire – whether that fire was "expected" or "unexpected.
    a. TCEQ should mandate that critical event response times be formulated and that critical response teams be training in how to prevent out of control fires.

b. TCEQ should mandate that critical event response times be formulated and that critical response teams be training in how to respond to natural disasters, including flooding, tornados, power surges., etc.

2. TCEQ's Executive Director is remiss for not requiring that the permit applicant demonstrate the amount of water and water pressure needed to extinguish a facility fire.

3. TCEQ's Executive Director is remiss for not requiring that this condition be met before approval.

4. TCEQ's Executive Director is remiss not protecting the citizens, businesses, wildlife, people and property of the surrounding area.

Issue #43 – 72-Hour Waste Storage

1. TCEQ's Executive Director is remiss for not adhering to the standards that the facility "must not lead to nuisances, such as odors, vectors or windblown waste." Permitting over 1,000 tons of solid waste to be exposed to 72 hours of hot Texas sun – with temperatures in excess of 105 degrees and not expecting odors and vectors is ludicrous or borders of mental delusions.

2. TCEQ's Executive Director is remiss in offering the community the solution of reporting such "nuisances" of writing the matter to Region 4 TCEQ Office, which is located 95 miles away (2 hours by car) in Fort Worth is frankly offensive and insulting. TCEQ's Executive Director's response to this issue is both debasing and humiliating.

Issue #47 – Individual Rights

1. TCEQ's Executive Director is remiss in not grasping the importance of Mr. Brecheisen's comments. TCEQ's apparent disregard for individual rights is simply disrespectful, especially since most TCEQ's are based on biased, self-serving statements from the permit applicant.

2. TCEQ Executive Director's opinions are in direct opposition to community members, School Board members and School Board Superintendents, Community Bank officers, academic professors, university Deans, a university President, as well as the Hunt County Judge and County Commissioner, as well as representatives from state representative both state senator offices.

3. The TCEQ Executive Director's opinion directly opposes a community comprised of people, businesses, schools, universities and others that do not want this facility on State Highway 24.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

4. It is obvious that Mr. Bray is using the land and resources of Hunt County to further enrich his personal wealth. His actions are tantamount to a rape and plundering of the land, as well as despoiling the quality life of people who live and work in this community.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, June 2, 2022 9:46 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: TCEQ Follow-Up Response Ltr 06-01-22.pdf

MSW
125147

H

From: Travis.Ball@tamuc.edu <Travis.Ball@tamuc.edu>
Sent: Wednesday, June 1, 2022 8:44 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Travis Ball

EMAIL: Travis.Ball@tamuc.edu

COMPANY: Texas A&M University-Commerce

ADDRESS: PO BOX 3011
COMMERCE TX 75429-3011

PHONE: 9038865060

FAX:

COMMENTS: TX A&M-Commerce provides the attached letter to supplement its initial letter submitted on November 15, 2021. This supplemental letter contains additional concerns with respect to the application for a solid waste transfer station under permit No. 2411 submitted by Transfer Station Solutions, LLC.

June 1, 2022

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78738

Re: Application of Transfer Station Solutions, LLC for a Municipal Solid Waste Facility Permit – Additional Concerns and Request for a Contested Case Hearing on the Merits

Dear Deputy Director Fritz:

Texas A&M University–Commerce ("University") again writes to express its deep and continued opposition to the application submitted by Transfer Station Solutions, LLC (the "Applicant") for the construction of a municipal solid waste facility ("waste facility") under Permit No. 2411, to inform the Texas Commission on Environmental Quality (the "Commission") of additional issues and problems associated with the construction of this waste facility, and to request a contested case hearing on the merits to assess these issues and problems fully. The University is an affected party because its campus is located within 300 feet across the highway from the proposed location of the waste facility. Therefore, the University has legal rights and economic interests that would be impacted if the Commission approves this proposed waste facility.

The local community's opposition to the waste facility has been virtually unanimous. The community does not want this waste facility in this location. In December 2021, Hunt County even passed an ordinance prohibiting any future waste facilities without the express approval from Hunt County due to this waste facility application.[1] If this waste facility application were submitted to the Commission today, it could not be built unless Hunt County approved its construction irrespective of any approval from the Commission. Hunt County listened to its residents and acted. The University and the local community ask the Commission to do the same and deny this application.

Since the University filed its November 11, 2021, letter to the Commission, it has further explored the impacts of the proposed waste facility on its operations and the surrounding area. The University also learned additional and troubling information at the Public Meeting held on April 28, 2022. The following issues must be fully assessed before any final decision on the permit is issued and once assessed, the University urges the Commission to conclude that this waste facility is inappropriate in this location:

[1] *See* Ordinance Prohibiting Solid Waste Disposal in Hunt County, effective December 28, 2021 *available at* https://www.huntcounty.net/upload/page/8875/docs/PUBLIC%20NOTICE%20-%20Hunt%20County%20Landfill%20Regulations.pdf.

1. **Inadequate Opportunity for Participation.** The Applicant has already failed to be a "good neighbor" to the local community affected by the filing of its application. First, the Applicant opted not to conduct an optional pre-application meeting to inform and meet with the local community.[2] Second, the University offered for the April 28, 2022, public meeting (the "Public Meeting") to be held on campus so that students, faculty, and local residents could attend. Instead, the Applicant opted to have the Public Meeting at The Landmark on Lee Street in Greenville, which is over 20 miles away from the proposed location of the waste facility. This location limited the ability of those most affected by this waste facility to express their concerns and hear from the Applicant. Many students and faculty have expressed concern to the University about this Public Meeting being in Greenville rather than Commerce and the difficulties this location presented to those who wanted to attend. The University is very concerned that only two (2) students out of a total student body of 8,000 were able to attend the Public Meeting. The Student Government Association even released a statement opposing the application—yet none of its members were able to attend due to the inconvenient location of the Public Meeting (attached hereto as **Exhibit A**). The Commission must consider requiring another public meeting in a more convenient location—a location that is not 20 miles from the location of the proposed waste facility—so that all those impacted can have an opportunity to participate in this process, including the students of the University.

2. **Unacceptable Traffic Safety Risks.** The University has evaluated the challenges and safety issues associated with the increased truck traffic (at least 174 daily trips) to and from the waste facility. In addition to the heavy traffic in the area, the University's analysis identified an average of over 70 vehicles per day traveling in front of the University's facilities near the waste facility at over 85 mph, with several in excess of 90 mph. Trucks already travel in this area at high speed and if the University's students, staff, and faculty are forced to navigate the presence of additional large trucks associated with the waste facility, everyone who must travel to the University is endangered. Students and faculty of the University will share an intersection with the waste facility as proposed. The high volume of large trucks the waste facility will add to the existing traffic already simultaneously navigating the numerous accelerating and decelerating vehicles in this area will increase the potential for accidents to an unacceptably high-risk level for the University community. The University recently needed to work with Texas Department of Transportation ("TXDOT") at another intersection in this area of State Highway 24 to provide new traffic control measures to address issues resulting from vehicles entering and exiting the University's facilities. Unfortunately, the ability of the roads to "handle" traffic flow based on TXDOT's metrics does not adequately address the unsafe conditions created by the increased traffic and more importantly, the nature of the traffic that will result from the waste facility (e.g., a combination of widely varying vehicle speeds). The addition of the waste facility truck traffic will create another high traffic intersection used by University students, faculty and staff. To assure this area is safe enough to protect the

[2] *See* 30 TAC §§ 39.501(b) and 330.53.

University community and the general public, the waste facility cannot be approved without adequate accommodation for the facility traffic which, at a minimum must include: 1) acceleration and deceleration lanes; 2) weekly cutting of the center median foliage to avoid visibility issues from the foliage in the center median; 3) road widening to accommodate the large trucks that will be using the cross-over median area of the road. Each truck can be as long as 59 feet and the road from shoulder to shoulder is only 70 feet wide, leaving far too little room for trucks to safely maneuver in and out of the transfer station with speeding traffic in both directions. The cross-over median portion of the road must be made to accommodate the full length of each truck to facilitate safety; 4) additional lighting and warning traffic signals to be installed to indicate to traffic that there may be large trucks turning in and out of the transfer station. The costs associated with all of these measures must be borne by the Applicant.

3. **Impact to University Research and Academic Offerings.** The University was created and is funded by Texas taxpayers to facilitate agricultural education and activities in the State of Texas. This waste facility will negatively impact the University's agricultural offerings. The University's College of Agricultural Sciences and Natural Resources has examined the likely impact of the waste facility to its current testing, operations, educational, research, and other agricultural offerings. This waste facility will limit the University's ability to continue its offerings without accommodations to staunch the impact of the waste facility now and in the future. Dr. Randy Harp and Dr. Jared Mumm from the University detailed the impacts to the University's Agricultural programs at the Public Meeting and submitted their own comments to the Commission. Moreover, the University already has existing requirements and protections for trash container delivery and transit in place to avoid the impact trash collection noise and commotion has on University animal research activities. Similar noise and associated impacts from this neighboring waste facility will need to be frequently assessed to determine what additional measures are necessary to counteract the negative effects of this waste facility to ongoing and future University research. Sudden, unpredictable noises add stress to an animal's environment (e.g., disrupts an animal's eating and sleeping patterns) and animal stress directly impacts animal health. The University cattle herd is particularly sensitive to stress triggers. It will be critical for the University to constantly assess how it will continue to maintain the levels of excellence it must offer in the presence of the waste facility. This constant assessment will require an unacceptable amount of attention and resources by the University annually—including training new staff and students about how to assess current and potential threats to animals and animal programs. The University provides additional information (attached hereto as **Exhibit B**) to give the Commission a preliminary idea as to the impact of waste facilities on animal environments. Further, the University will need to conduct an exhaustive review of current and future grant applications and other funding requirements to identify whether the existence of the waste facility will complicate its ability to or disqualify it completely from continuing to receive or qualify for research funding due to the proximity of the waste facility stressors to its current and future animal operations.

4. **Unacceptable Operation of Transfer Station.** At the Public Meeting, a commenter identified that if the application is approved as submitted that trash could be held in the waste facility for up to 72 hours. Such a long time period is problematic because this amount of time will allow waste to decompose and cause odors that will impact University events and daily activities—especially during the summer months. As an example of a circumstance the University must avoid, if trash is taken to the waste facility on Friday prior to a holiday weekend, that trash could sit in the waste facility decomposing in the heat with stray trash blowing during University events such as rodeos and Memorial Day observances. The prospect of odors and trash—even with the Commission-required measures—disrupting University events cannot be allowed.

5. **Fire Safety**. At the Public Meeting, the Applicant acknowledged the possibility that should a fire occur on site, it may be necessary to call the local volunteer fire department because the onsite water tank for fire suppression could be exhausted. Because of the threat of fire from waste facilities, it is essential that this waste facility be located in an area where a professional (non-volunteer) firefighting force is present.

6. **Property Valuation.** There are extensive studies (attached hereto as **Exhibit C**) assessing the impact of waste facilities like the proposed transfer station on nearby property values. The Commission must require further studies and analysis to identify additional protections and accommodations to preserve community property values and the University's own property values. While there are various studies concerning the impact of waste facilities on residential property values, a thorough analysis of the impact of waste facilities on the University's property has not been performed. It will be critical for the Commission to determine the impact of the waste facility on the University's property used for educational and research purposes —property it must preserve in trust on behalf of the people of Texas—now and over time.

7. **Need for Transfer Station.** We understand the North Central Texas Council of Governments (NCTCOG), voted in support of the waste facility, but that vote did not include any assessment of the impact of the waste facility on the surrounding area. The Commission should further consult with the NCTCOG about whether this waste facility is in fact proposed in the optimal location.

8. **Size of Waste Facility**. At the Public Meeting, a commenter identified that the proposed waste facility is designed to serve the waste needs of up to 400,000 persons when available data indicates that Hunt County will have only 120,000 inhabitants by 2050. The sizing indicates that the Applicant intends to process the waste of an extended region and not only Hunt County. Hunt County should not be the destination for regional waste and the Commission must deny an application of this size because it does not fit the needs of the community.

9. **SOAH Hearing.** Accordingly, the University respectfully requests that the Commission refer to the State Office of Administrative Hearings the issues listed on **Exhibit D** attached hereto.

Finally, student and faculty recruitment is an ongoing and challenging focus of the University. The University is concerned about its ability to grow, expand and attract students and faculty, and receive grants for research opportunities with a waste facility directly across from its campus. We look forward to a thorough review of these issues.

Sincerely,

Mark Rudin
President

Attachments

cc: Office of General Counsel, The Texas A&M University System

EXHIBIT A

Student Government Association Statement

Student Government Association
Texas A&M University-Commerce

Transfer Station Solutions, LLC Opposition Statement

To our Student Body, Faculty, Staff, and Commerce Community,

The Student Government Association was recently informed of a waste transfer station that is applying to open in Commerce, TX. The Texas A&M University-Commerce Student Government Association joins many other concerned members of the Commerce community in OPPOSITION of Transfer Station Solutions, LLC. The proposed plan for this waste facility would sit on State Highway 24 directly across the University Farm as well as many Commerce residencies; such fulfillment would result in an unsuitable educational environment.

We are certain that by going through with this project:

- There would be increased tractor-trailer traffic going to and from the waste facility on State Highway 24 endangering students, faculty, staff, and the community traveling to and from campus and Commerce, TX;
- This would impact the ability of the university to maintain its agricultural research and educational offerings to the people of Texas;
- The waste facility would increase noise, trash, and other hazards and nuisances that are unsuitable for an educational environment;
- The noise and odors would impact not only the students, agricultural facility, animal facilities, veterinary services and instruction, but the environment and vegetation that surrounds as well;
- Potential windblown debris and odor may spread throughout the City of Commerce

TCEQ's Office of the Chief Clerk will facilitate a public meeting on Transfer Station Solutions, LLC's proposed Municipal Solid Waste (MSW) Permit No. 2411 to authorize a new Type V municipal solid waste transfer station. This hearing will be held at 7PM Thursday, April 28 2022 at The Landmark 2920 Lee St. Greenville, TX 75401. We strongly encourage students, faculty and staff, and the Commerce community to come out, participate, and let your voice be heard about this issue.

Sincerely,

Adriel Terrazas

Adriel Terrazas
Student Government Association
President

EXHIBIT B
ANIMAL IMPACT STUDIES

1. Fernandez-Novo, Aitor., Perez-Garnelo, Sonia S., Villagra, Arantxa., Perez-Villalobos, Natividad., Astiz, Susana. 2020. The Effect of Stress on Reproduction and Reproductive Technologies in Beef Cattle—A Review. Animals.

2. Broucek. 2014. Effect of noise on performance, stress and behavior of animals. Slovak J. Anim. Sci.

3. Phil M. Urso, Abe Turgeon, Flavio R. B. Ribeiro, Zachary K. Smith & Bradley J. Johnson (2021) Review: the effects of dust on feedlot health and production of beef cattle, Journal of Applied Animal Research, 49:1, 133-138, DOI: 10.1080/09712119.2021.1903476

EXHIBIT C
STUDIES ON IMPACT OF WASTE FACILITES ON SURROUNDINGS

1. BBC Research & Consulting, *Potential Impacts of Proposed Waste Transfer Station near Carbondale*, November 26, 2012.

EXHIBIT D
LIST OF ISSUES FOR REFERAL TO THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

1. The Applicant has not sufficiently demonstrated that the proposed transfer station meets the ventilation and air pollution control requirements required under 30 TAC §§ 330.209, or 330.245; nor that the operation of the proposed transfer station will not result in noise, odors, or other nuisances under §§ 330.15 and 330.233, impacting the University community, surrounding community, wildlife, or agricultural uses in the vicinity.

2. The Applicant has not sufficiently demonstrated that the management and operation of the proposed transfer station meets the requirements under 30 TAC §§ 330.203, 330.205, 330.215, and 330.249.

3. The Applicant has not demonstrated that it has sufficient competency to operate the proposed transfer station given the unique nature of the surrounding area as required under 30 TAC § 330.59.

4. The Applicant has not demonstrated that the proposed transfer station is a compatible land use in light of the concerns raised by the University and the local community as required under 30 TAC § 330.61.

5. The Applicant has not demonstrated that the proposed accommodations for the use of the roads and the intersection in the vicinity of the transfer station adequately accommodate the needs of the transfer station and those of the current and future surrounding community as required under 30 TAC § 330.61.

6. The Applicant has not demonstrated that the proposed transfer station will not cause the endangerment of human health, welfare, or the environment as is prohibited under 30 TAC §§ 330.15(a)(3) or 330.221.

7. The Applicant has not demonstrated that it will implement adequate waste screening measures for identification and removal of hazardous or flammable wastes that could endanger the University, its buildings, its agricultural programs, and the surrounding community and neighborhoods as required under 30 TAC §§ 330.203 and 330.241.

8. The Applicant has not demonstrated adequate wetlands delineation nor has it adequately addressed potential impacts to nearby wetlands or ponds as required under 30 TAC §§ 330.61, 330.63, and 330.547.

9. The Applicant has not sufficiently demonstrated that the proposed transfer station will adequately protect the aquifer, which is shallow and permeable, or the local groundwater

for the surrounding community as required under 30 TAC §§ 330.63, 33.207, 330.303, and 330.401-403.

10. The Applicant has not demonstrated that the proposed operating hours for the proposed transfer station will not impact the various operations of the University, including agricultural operations, as required under 30 TAC § 330.229.

11. The Applicant cannot meet the requirements of 30 TAC § 330.231 without negatively impacting the campus environment and violating 30 TAC § 330.239. Further, the Applicant has failed to provide signage in Spanish as required by the Commission.

12. The Applicant has not demonstrated that the proposed transfer station will not negatively impact local residential, commercial, agricultural, or educational institution property values.

13. The Applicant has not demonstrated that the proposed transfer station will actually decrease alleged "illegal dumping" in the area.

14. The Applicant has not demonstrated that if citizens are allowed to access the transfer station to dispose of waste, that the roads to and in the vicinity of the waste facility can safely accommodate the additional traffic.

15. The University requests that the Commission reconsider the Executive Director's "technically complete" determination.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, June 3, 2022 4:39 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: #32.docx

H

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Friday, June 3, 2022 4:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dr. Dave Giles

EMAIL: dgiles@gilesgroup.net

COMPANY: Rancho Giles

ADDRESS: PO BOX 58
CAMPBELL TX 75422-0058

PHONE: 8173662026

FAX:

COMMENTS: see attachment

#3

During the recent community meeting with TCEQ, it was apparent that TCEQ was relying heavily on the notion that the TX-DOT analysis that there would not be a significant amount of increase in vehicular traffic on Highway 24 because of this solid waste transfer station. This conclusion is factually accurate but if misses the point.

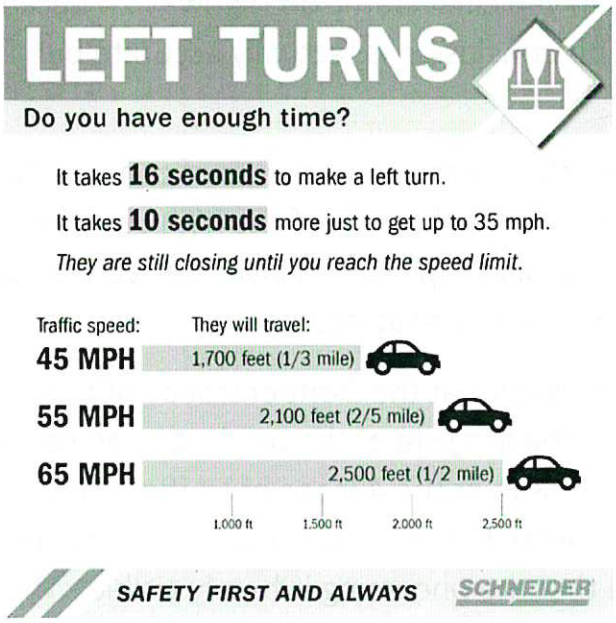
It is not the volume of traffic on state highway 24 that is of concern, but the types of vehicles that are on the highway. On this part of the highway, there are significant visual restrictions, as well as "speed and distance" concerns. These concerns, not volume-related concerns are at issue here.

Examine this phot of a front-end loader at the front entrance of the proposed state highway solid waste facility. On the left side of the road, you can see an oncoming, south-bound vehicle about to cross over the 4 loans of traffic. The oncoming vehicle is travelling at approximately 75 to 80 mph (110 to 117 feet per second). From this picture, you can see that the oncoming is barely visible. The average time required to travel (at those speeds) from this first visualization spot to the medium intersection in front of the proposed solid waste transfer station is 12 seconds.



Schneider FrieghtPower® is a world-class freight hauler with multiple operations centers. Schneider's website (https://schneiderjobs.com/blog/turn-left-with-

tractor-trailer) asserts that it takes 16 seconds for a tractor-trailer to exercute a left-hand turn. Examine material taken from Schneider's website:



- The Impact of those 16 seconds is that the opposing lanes will be blocked while the tractor-trailer completes their left- and turn. As seen in the graphic below,

Speed	TRAVELING AT PER SECOND
30 mph	44 feet
40 mph	59 feet
50 mph	73 feet
60 mph	88 feet
70 mph	103 feet
75 mph	**110 feet**
80mph	117 feet
90 mph	121 feet

A vehicle traveling on State Highway 24 at 75mph will travel 1760 feet (roughly 1/3 of a mile) during the 16 seconds that the tractor-trailer is making a left-hand turn across State Highway 24.

The same situation exists on the north-bound side of the road. But, the averages time from visual detection to crossing the median in front of the facility averages 14 seconds.

If this permit is granted, there will be collisions, injuries and deaths.

RIGHT-HAND TURNS ARE JUST AS DANGEROUS (Federal Motor Carrier Safety Administration)

https://www.fmcsa.dot.gov/ourroads/wide-turns

The Federal Motor Carrier Safety Administration has a handy graphic and guide on their website to help vehicle drivers understand how to drive around tractor trailer trucks. The graphic shows that semi rigs often have to enter the other lane of traffic to make right hand turns because the trailer requires them to turn further into the intersection for clearance.

A truck driver could easily be focused on his mirrors, watching for clearance for the back of his truck. Rather than being focused on just how far forward he's pulling into your lane as you're stopped at a light or driving with the flow of traffic and obeying the law, that truck driver could easily cause an accident if he's not careful.

The fact alone that trucks must often drive into oncoming traffic to make turns is troubling but what's more is that truck drivers, trucking companies, and even the FMCSA place blame on vehicle drivers. Anyone reading the information on the FMCSA's guide can easily see it's crafted in a way to place blame on drivers of vehicles, rather than the truck drivers.

"Pay particular attention when trucks are turning right so you don't get caught in the 'right turn squeeze,'" the guide indicates, insinuating that it's a vehicle driver's fault for not getting out of a truck's way.

Vehicle Stopping Distance and Time

Highway traffic and safety engineers have some general guidelines they have developed over the years and hold now as standards. As an example, if a street surface is dry, the average driver can safely decelerate an automobile or light truck with reasonably good tires at the rate of about 15 feet per second (fps). That is, a driver can slow down at this rate without anticipated probability that control of the vehicle will be lost in the process.

The measure of velocity is distance divided by time (fps), stated as feet per second. The measure of acceleration (or deceleration in this case) is feet per second per second. That assumes a reasonably good co-efficient of friction of about .75; better is .8 or higher while conditions or tire quality might yield a worse factor of .7 or lower

No matter the velocity, that velocity is reduced 15 fps every second. If the initial velocity is 60 mph, 88 fps, after 1 second elapsed, the vehicle velocity would be 73 fps, after 2 seconds it would be 58 fps decreasing progressively thereafter. For the true mathematical perfectionist (one who carries PI to 1000 decimal places), it would have been technically correct to indicated the formula is 'fpsps' rather than 'fps', but far less understandable to most drivers. Since at speeds of 200 mph or less, the difference from one method to the other is in thousanths of seconds, our calculations in these examples are based on the simple fps calculations.

Given the previous set of conditions, it would mean that a driver could stop the described vehicle in a total of 6.87 seconds (including a 1 second delay for driver reaction) and your total stopping distance would be 302.28 feet, slightly more than a football field in length!

Virtually all current production vehicles' published road braking performance tests indicate stopping distances from 60 mph that are typically 120 to 140 feet, slightly less than half of the projected safety distances. While the figures are probably achievable, they are not realistic and certainly not average; they tend to be misleading and to those that actually read them, they create a false sense of security.

By increasing braking skills, drivers can significantly reduce both the time it takes to stop and the distance taken to stop a vehicle. Under closed course conditions, professional drivers frequently achieve 1g deceleration (32 fpsps) or better. A reasonably skilled driver could easily get deceleration rates in excess of 20 fpsps without loss of control. It is very possible and probable that with some effort, the driver that attempts to be aware of braking safety procedures and practices can and should get much better braking (safely) than the guidelines used nationally, approaching that of the professionally driver published performance tests.

To determine how far the vehicle will travel while braking, use the formula of 1/2 the initial velocity multiplied by the time required to stop. In this case, this works out to be .5 * 88 * 4.4 = 193.6 feet, plus a reaction time of either 88 feet for a second delay in reaction time, or 176 feet for two seconds reaction time. That yields 281.6 feet or 369.6 when added to the base stopping distance of 193.6 feet. If the driver is very responsive and takes only a half a second to react, the distance is reduced to 237.6 feet. Notice that the reaction time is a huge factor since it is at initial velocity.

Based on pure math, it is evident that there is a very large difference in the reported performance tests and reality. Assuming a deceleration rate of 32 fpsps (1g), calculations indicate a braking stop time of 2.75 seconds (88/32). Distance traveled now is calculated to be 121 feet, which is for all practical purposed, the published performance figures, excluding reaction times. The intelligent driver will error on the safe side and leave room for reaction time and less than perfect conditions. That driver will also hone the braking skills to give more of a margin of safety. That margin can save lives. Pay attention to the need to react quickly.

The intelligent driver will error on the safe side and leave room for reaction time and less than perfect conditions. That driver will also hone the braking skills to give more of a margin of safety. That margin can save lives. Pay attention to the need to react quickly.

How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic

development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community.

As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

Office of the Chief Clerk

TCEQ

12100 Park 35 Circle, Bldg F
Austin, TX 78753

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, June 3, 2022 4:34 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: #4.docx

eComment = H
Attachment = H

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Friday, June 3, 2022 4:16 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dr. Dave Giles

EMAIL: dgiles@gilesgroup.net

COMPANY: Rancho Giles

ADDRESS: PO BOX 58
CAMPBELL TX 75422-0058

PHONE: 8173662026

FAX:

COMMENTS: TCEQ has repeatedly stated that they are not concerned about underground water, except for the Edwards Aquafer. In this phot, you can clearing see a pond of water in the adjoining land's sand pit. These pits are 20-25 feet deep. The water in these pits are not rain water. This water is coming from the shallow aquafer in the area. This is the

same aquafer that surrounding neighbors use for their drinking water. Yet, TCEQ remains "unconcerned." How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community. As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

My rights to enjoy my life and hard work are being sacrificed by TCEQ, which is a "rubber-stamp" organization the does not conduct their own research nor seeks to secure independent research, but instead relies (and accepts) o representations made by the permit applicant (Josh Bray). TCEQ shamefully accepts representations made by the permit applicant that has an obvious bias and self-interest. TCEQ has exhibited no scientific rigor or even expressed any concern for the scientific facts.

TCEQ'S OVER-RELIANCE AND LACK OF INDEPENDENT COLLABORATION OF FACTS AND DATA. TCEQ information is factula inaccurate as to the number of vehicles reportedly on the road on State Highway 24. I suspect that the number of trucks reportedly using State Highway 24 is also inaccurate. This is because TCEQ relied exclusively upon the representation made by the permit applicant. There was no independent sources of information cited by TCEQ during the community meeting.

TCEQ seems to lack the ability to protect the environment adequately. It appears that their main purpose is to "coach and mentor" applicants through the permit application process. While TCEQ will entertain questions from the public, they are reluctant to reject any permit application. In fact, by their own admission at the recent TCEQ Community Meeting (Steve Odil), TCEQ has never not approved a permit application.

How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community.

As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, June 3, 2022 4:39 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: #2.docx

H

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Friday, June 3, 2022 4:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dr. Dave Giles

EMAIL: dgiles@gilesgroup.net

COMPANY: Rancho Giles

ADDRESS: PO BOX 58
CAMPBELL TX 75422-0058

PHONE: 8173662026

FAX:

COMMENTS: My name is Dr. David Alan Giles. I live at 3714 State Highway 24 Campbell, Texas 75422, which is within 1 mile of the proposed solid waste transfer station (Permit 2411). My Phone number is 817-366-2026. In addition to being harmed economically, I feel that my health and the health and safety of my family, friends and neighbors will be adversely impacted if this permit if granted. Specifically, I understand that, if this permit is granted, I will be exposed to

noxious smells, contaminated trash, harmful air borne contaminates, excessive loud noises, potential wildfires and extremely hazardous driving conditions. My rights to enjoy my life and hard work are being sacrificed by TCEQ, which is a "rubber-stamp" organization the does not conduct their own research nor seeks to secure independent research, but instead relies (and accepts) o representations made by the permit applicant (Josh Bray). TCEQ shamefully accepts representations made by the permit applicant that has an obvious bias and self-interest. TCEQ has exhibited no scientific rigor or even expressed any concern for the scientific facts. TCEQ is willing to defer its responsibilities for placement and authorization of the facility and hide behind Tx DOT. TCEQ claims no responsibilities for the exit or entrance of highway traffic around this facility. Cornell Law School defines "Attractive nuisance is "a dangerous condition on a landowner's property that may particularly attract people onto the land and pose a risk to their safety." The basic elements of an attractive nuisance include: • A potentially dangerous condition exists on the property; • The landowner created and/or maintained the potential hazard; • The landowner should have known that the condition would attract people, and • The landowner should have known the condition could harm. As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

My name is Dr. David Alan Giles. I live at 3714 State Highway 24 Campbell, Texas 75422, which is within 1 mile of the proposed solid waste transfer station (Permit 2411). My Phone number is 817-366-2026. In addition to being harmed economically, I feel that my health and the health and safety of my family, friends and neighbors will be adversely impacted if this permit if granted.

Specifically, I understand that, if this permit is granted, I will be exposed to noxious smells, contaminated trash, harmful air borne contaminates, excessive loud noises, potential wildfires and extremely hazardous driving conditions.

My rights to enjoy my life and hard work are being sacrificed by TCEQ, which is a "rubber-stamp" organization the does not conduct their own research nor seeks to secure independent research, but instead relies (and accepts) o representations made by the permit applicant (Josh Bray). TCEQ shamefully accepts representations made by the permit applicant that has an obvious bias and self-interest. TCEQ has exhibited no scientific rigor or even expressed any concern for the scientific facts.

TCEQ is willing to defer its responsibilities for placement and authorization of the facility and hide behind Tx DOT. TCEQ claims no responsibilities for the exit or entrance of highway traffic around this facility. Cornell Law School defines "Attractive nuisance is "**a dangerous condition on a landowner's property that may particularly attract people onto the land and pose a risk to their safety." The basic elements of an attractive nuisance include:**

- A potentially dangerous condition exists on the property;
- The landowner created and/or maintained the potential hazard;
- The landowner should have known that the condition would attract people, and
- The landowner should have known the condition could harm.

As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, June 3, 2022 4:36 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: #1.docx

H

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Friday, June 3, 2022 4:20 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dr. Dave Giles

EMAIL: dgiles@gilesgroup.net

COMPANY: Rancho Giles

ADDRESS: PO BOX 58
CAMPBELL TX 75422-0058

PHONE: 8173662026

FAX:

COMMENTS: As posted earlier by Dr. Randy Harp, Dean of the College of Agricultural Sciences and Natural Resources (CASNR) at Texas A&M Commerce, the university division has doubled its student count and faculty in growth over the past 6 six years. As the university grows, we will be looking to expand land opportunities to accommodate our teaching, research and outreach. Thus, future barriers, such as this transfer station, will negatively alter this potential for the

animals, students and industry. Texas A&M University-Commerce has an obligation to serve the community, region and state. This proposed facility being this close to the university only promotes compromised research and would pose a significant barrier to securing future research dollars. This would cripple the university and the community. How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community. As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

#1

As posted earlier by Dr. Randy Harp, Dean of the College of Agricultural Sciences and Natural Resources (CASNR) at Texas A&M Commerce, the university division has doubled its student count and faculty in growth over the past 6 six years. As the university grows, we will be looking to expand land opportunities to accommodate our teaching, research and outreach. Thus, future barriers, such as this transfer station, will negatively alter this potential for the animals, students and industry. Texas A&M University-Commerce has an obligation to serve the community, region and state. This proposed facility being this close to the university only promotes compromised research and would pose a significant barrier to securing future research dollars. This would cripple the university and the community.

How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community.

As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, June 3, 2022 4:36 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: #6.docx

H

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Friday, June 3, 2022 4:19 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dr. Dave Giles

EMAIL: dgiles@gilesgroup.net

COMPANY: Rancho Giles

ADDRESS: PO BOX 58
CAMPBELL TX 75422-0058

PHONE: 8173662026

FAX:

COMMENTS: According to Robby DeWitt, a financial officer with the Texas Forest Service (the states's lead wildfire response agency) the costs of fighting wildfires in Texas during this fiscal year exceeds $49.2 million. TECQ has not required the permit applicant to demonstrate how they would contain a fire at the facility. The city of Campbell has a small, volunteer fire fighting company, which is located several miles from the facility. The water system, Maloy Water,

is inadequate to provide a sustained response to any uncontrolled fire that might occur at this proposed facility. No one anticipates that a fire will occur – no one expects it – but they do happen – and they are extremely destructive. If they occur, Mr. Bray and his Limited Liability Corporation, will use their corporate structure to escape any responsibility for the ensuing damages. How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community. As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

#6

Wildfires

According to Robby DeWitt, a financial officer with the Texas Forest Service (the states's lead wildfire response agency) the costs of fighting wildfires in Texas during this fiscal year exceeds $49.2 million.

TECQ has not required the permit applicant to demonstrate how they would contain a fire at the facility. The city of Campbell has a small, volunteer fire fighting company, which is located several miles from the facility. The water system, Maloy Water, is inadequate to provide a sustained response to any uncontrolled fire that might occur at this proposed facility.

No one anticipates that a fire will occur – no one expects it – but they do happen – and they are extremely destructive. If they occur, Mr. Bray and his Limited Liability Corporation, will use their corporate structure to escape any responsibility for the ensuing damages.

How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community.

As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, June 3, 2022 4:35 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411
Attachments: #52.docx

eComment = H
Attachment = H

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Friday, June 3, 2022 4:18 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dr. Dave Giles

EMAIL: dgiles@gilesgroup.net

COMPANY: Rancho Giles

ADDRESS: PO BOX 58
CAMPBELL TX 75422-0058

PHONE: 8173662026

FAX:

COMMENTS: TCEQ has repeatedly stated that they are not concerned about underground water, except for the Edwards Aquafer. In this phot, you can clearing see a pond of water in the adjoining land's sand pit. These pits are 20-25 feet deep. The water in these pits are not rain water. This water is coming from the shallow aquafer in the area. This is the

same aquafer that surrounding neighbors use for their drinking water. Yet, TCEQ remains "unconcerned." How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community. As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

#5

SHALLOW AQUIFER



TCEQ has repeatedly stated that they are not concerned about underground water, except for the Edwards Aquafer. In this phot, you can clearing see a pond of water in the adjoining land's sand pit. These pits are 20-25 feet deep. The water in these pits are not rain water. This water is coming from the shallow aquafer in the area. This is the same aquafer that surrounding neighbors use for their drinking water. Yet, TCEQ remains "unconcerned."

How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community.

As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, June 3, 2022 4:33 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

H

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Friday, June 3, 2022 4:15 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dr. Dave Giles

EMAIL: dgiles@gilesgroup.net

COMPANY: Rancho Giles

ADDRESS: PO BOX 58
CAMPBELL TX 75422-0058

PHONE: 8173662026

FAX:

COMMENTS: My rights to enjoy my life and hard work are being sacrificed by TCEQ, which is a "rubber-stamp" organization the does not conduct their own research nor seeks to secure independent research, but instead relies (and accepts) o representations made by the permit applicant (Josh Bray). TCEQ shamefully accepts representations made by the permit applicant that has an obvious bias and self-interest. TCEQ has exhibited no scientific rigor or even expressed any concern for the scientific facts. TCEQ'S OVER-RELIANCE AND LACK OF INDEPENDENT COLLABORATION OF FACTS

AND DATA. TCEQ information is factula inaccurate as to the number of vehicles reportedly on the road on State Highway 24. I suspect that the number of trucks reportedly using State Highway 24 is also inaccurate. This is because TCEQ relied exclusively upon the representation made by the permit applicant. There was no independent sources of information cited by TCEQ during the community meeting. TCEQ seems to lack the ability to protect the environment adequately. It appears that their main purpose is to "coach and mentor" applicants through the permit application process. While TCEQ will entertain questions from the public, they are reluctant to reject any permit application. In fact, by their own admission at the recent TCEQ Community Meeting (Steve Odil), TCEQ has never not approved a permit application. How can TCEQ claim their mission statement to be "strives to protect our state's public health and natural resources consistent with sustainable economic development? How can TCEQ look these Texans in the eye and claim that they are protecting their rights to a quality of life? I do not believe that TCEQ has provided an unbiased assessment of the potential harm and adverse environment consequences to the citizens of this Texas community. As an adversely impacted citizen of Texas, I respectfully request a contested administrative case hearing.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 8:43 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

RFR

From: acj2000@gmail.com <acj2000@gmail.com>
Sent: Monday, November 15, 2021 2:52 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Autumn Johnson

E-MAIL: acj2000@gmail.com

COMPANY:

ADDRESS: 3201 OVERLOOK DR
ROYSE CITY TX 75189-5171

PHONE: 9034683171

FAX:

COMMENTS: Please reconsider the location of the Transfer Station Solutions, LLC municipal solid waste facility transfer station. This location is too close to Texas A&M University-Commerce.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 29, 2021 2:47 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

RFR

From: jemanningdvm@gmail.com <jemanningdvm@gmail.com>
Sent: Monday, November 29, 2021 2:31 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Jonathan Manning

E-MAIL: jemanningdvm@gmail.com

COMPANY: Hunt County Animal Hospital

ADDRESS: 3440 STATE HIGHWAY 24
CAMPBELL TX 75422-1290

PHONE: 9038863911

FAX:

COMMENTS: November 20, 2021 Mr. Charley Fritz Deputy Director TCEQ – Waste Permits Division 12100 Park 35 Circle Austin TX, 78735 Ms. Laurie Gharis Chief Clerk Office of Chief Clerk, MC 105 TCEQ P.O. Bos 13087 Austin, TX 78711-3087 Re: Application of Transfer Station Solution Permit Dear Deputy Director Fritz and Chief Clerk Gharis, Hunt County Animal Hospital sits across the from the proposed site for the Transfer Station. To give a little history of the Clinic, it was established in 1976 by Dr. Buddy Gregg. It has been a thriving small town veterinary clinic since. It has the small town

feel to it, when you walk through the front door, the receptionist greets you by name and talks to the pet. In February of 2014, Dr. Gregg retired and Hunt County Animal Hospital started. We have grown over the last 7 years to a busy business. We service the Commerce, Campbell, Greenville area for both small and large animals. We work long hours to try and provide the best care for our patients. Having a waste transfer facility across the road would be very detrimental on the growth of the area and on my business. What the transfer facility would bring to the area would be a detriment to anything surrounding it. The towns of Commerce and Campbell are growing at increasing pace since the pandemic hit. Population in 2020 was 99,807, but there is a lot of growth potential, just look at Rockwall, Fate, and Caddo. Most people are moving out of the big city and to these small-town areas. There are three major roads going into Commerce, TX, of which the transfer station site would be on the busiest of them. I have been at this place of business for going on 8 years and can attests to the number of wrecks that happen on this road. South of us, Texas A&M Commerce had to rework Highway 24, and the entrance into facilities because of the number of wrecks. There is a sand pit, just south too that has several wrecks a year also. The speed limit is 75 mph, and to have slow trash trucks pulling in and out of this facility with traffic will cause multiple wrecks. The traffic from Hunt County Sand, as of right now is just a few trucks a day, nothing real heavy. Depending on the trucks entering this facility and their trash capacity, there would be approx. 107 haul trucks, 35 transfer trucks if they are to have 1000 tons a day brought in. I see this site as a convenience for the trash company and coming from the surrounding areas, but it is next to the Texas A&M University land, Sandhill's Golf Course, residents, veterinary clinic and Agrilife extension. There is a water treatment facility 3/10 of a mile northwest of the transfer facility. This transfer station would be situated about 2.5 miles south of the Commerce, most the time the wind is out of the south in the warm times of the year in Texas. The odors coming from the putrescible waste would be felt for miles. Growing up in Westminister, TX, there was a feed yard in Melissa, TX called Stoney Point. When the winds were right, we could smell the corn-fed steers for miles, and it was not pleasant. I hope you would reconsider the impact placing this waste transfer facility at the proposed site. The harm it would do to the community and environment around it would be too much.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:22 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

RFR

From: vickiesteam@msn.com <vickiesteam@msn.com>
Sent: Sunday, December 19, 2021 9:10 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Vickie Mize

E-MAIL: vickiesteam@msn.com

COMPANY:

ADDRESS: 1780 COUNTY ROAD 4109
CAMPBELL TX 75422-1204

PHONE: 2148789088

FAX:

COMMENTS: Please reconsider another location, we just moved out here and this is very disheartening to learn. This would also cause a lot more traffic on an already busy road. Keep our small town clean and healthy

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:31 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

RFR

From: kmtplayspiano@gmail.com <kmtplayspiano@gmail.com>
Sent: Monday, November 15, 2021 2:30 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MISS Kristi M. Taylor

E-MAIL: kmtplayspiano@gmail.com

COMPANY: Texas A&M University-Commerce

ADDRESS: 1508 CADDO ST
COMMERCE TX 75428-2542

PHONE: 9032174728

FAX:

COMMENTS: I, Kristi M. Taylor, hereby strongly encourage the HIGHWAY 24 TRANSFER STATION to be placed at a different location based upon President Dr. Rudin's submission on behalf of TAMUC and the community of Commerce, TX. Furthermore, the university has made great efforts to have an exceptional AG program, granted recent Texas legislative objectives to expand learning facilities along HWY 24. Having a waste station next to these locations would

deter the expansion of the university programs and learning experience at TAMUC proper. Please reconsider placing the station in a different location, away from this specific area.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, November 19, 2021 10:07 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

H

From: zhao.joe@gmail.com <zhao.joe@gmail.com>
Sent: Thursday, November 18, 2021 9:46 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Joe Zhao

E-MAIL: zhao.joe@gmail.com

COMPANY:

ADDRESS: 357 COUNTY ROAD 3101
GREENVILLE TX 75402-8803

PHONE: 9724671366

FAX:

COMMENTS: Re: Regulated Entity Name: HIGHWAY 24 TRANSFER STATION RN Number: RN111320396, TCEQ Permit No.: 2411, Principal Name: TRANSFER STATION SOLUTIONS LLC, CN605924968 My name is Joe Zhao. I oppose the proposed permit application. I would like to be added to the mailing list for this application process. And I would like to request a contested hearing.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, April 27, 2022 2:31 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411
Attachments: Project Sign on HWY 241.docx

MSW
125147

From: cbreche@yahoo.com <cbreche@yahoo.com>
Sent: Wednesday, April 27, 2022 2:12 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christopher Jeremy Brecheisen

EMAIL: cbreche@yahoo.com

COMPANY: Brecheisen Farm

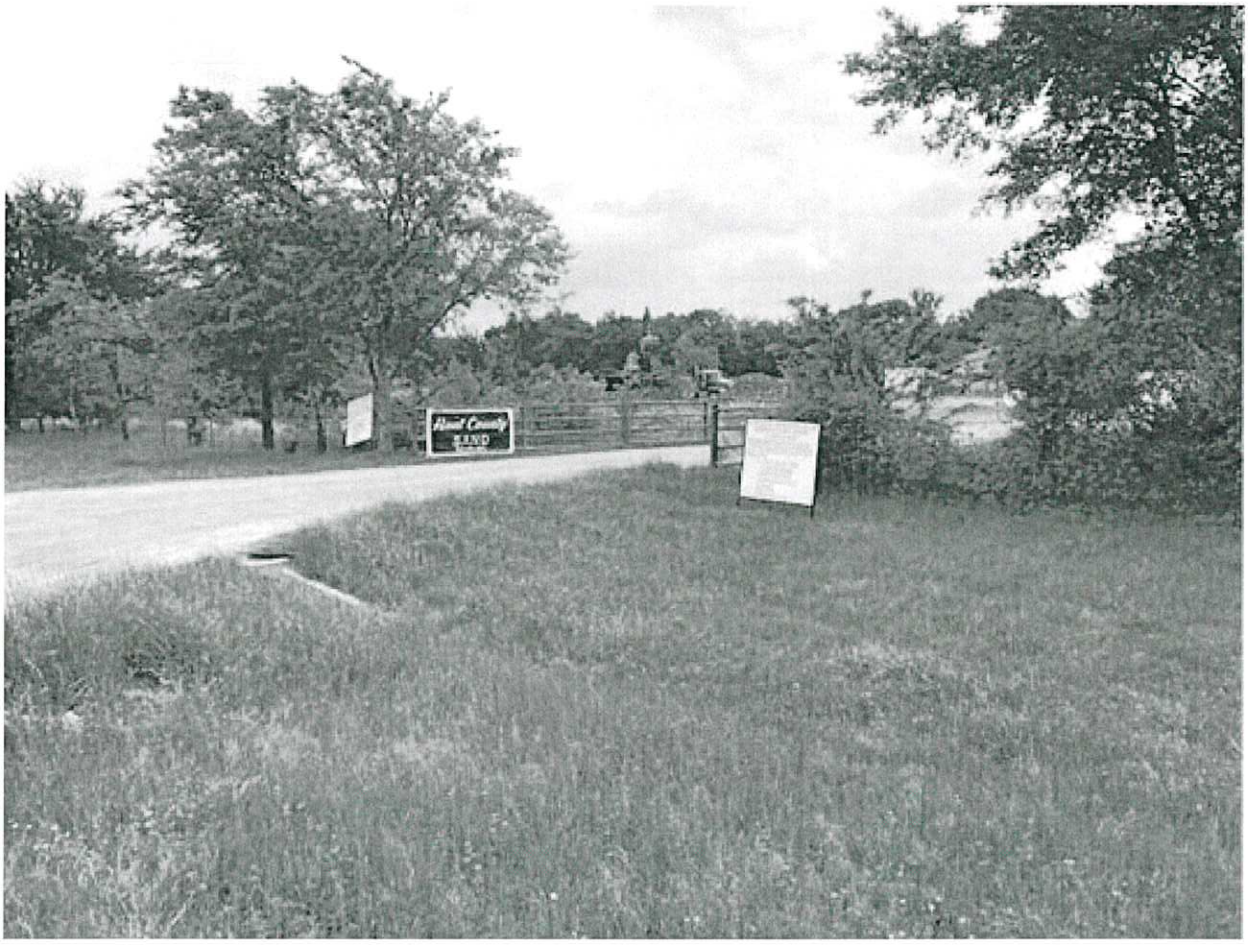
ADDRESS: 1686 COUNTY ROAD 4208
CAMPBELL TX 75422-1766

PHONE: 9035136875

FAX:

COMMENTS: In what local newspaper and on what dates did the required project notification run? Can you please provide the digital copy of the newspaper run that TCEQ keeps on file for verification so that residents know that the requirements were actually met. Additionally, I have attached a picture of the signs posted at the proposed project site. Does TCEQ believe residents are actually supposed to be able to read these signs on a four lane highway going 70 MPH

with no adequate parking area to get out and review? That seems quite unsafe actually, but I'd like TCEQ's professional opinion on reading small text signs while driving. Also, I would like TCEQ to address the sign requirements (min number required and bilingual requirements) to determine if these requirements were actually met.


Kent County
SAND

Lori Rowe

From:	PUBCOMMENT-OCC
Sent:	Tuesday, April 19, 2022 2:14 PM
To:	PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject:	FW: Public comment on Permit Number 2411

MSW
125147

From: Amanda.Delisle@tamuc.edu <Amanda.Delisle@tamuc.edu>
Sent: Tuesday, April 19, 2022 9:47 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Amanda DeLisle

EMAIL: Amanda.Delisle@tamuc.edu

COMPANY: Texas A&M University- Commerce

ADDRESS: 2628 CHARITY RD
COMMERCE TX 75428-3931

PHONE: 2145853778

FAX:

COMMENTS: I am opposed to this permit for the following reasons: •Increased traffic (Up to 200 trucks per day) in front of the university that will cause congestion and endanger students and staff entering and exiting campus •Cause an increase in odors and other nuisances that could impact the quality of campus life •Impact local property values •Impact the aquifer that the university and community use as a water supply •Visual impacts from campus and related to ensuring that the campus environment remains one future students wish to attend to further their educational goals my

veterinary teaching lab is across the street and would be seriously, negatively impacted. I also live in this community not far from the site and I do not want this happening anywhere near where I work and live.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, March 29, 2022 11:14 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: tedcrim1947@gmail.com <tedcrim1947@gmail.com>
Sent: Tuesday, March 29, 2022 8:03 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Ted Ray Crim

E-MAIL: tedcrim1947@gmail.com

COMPANY:

ADDRESS: 2313 NEWCASTLE CIR
PLANO TX 75075-3328

PHONE: 9729641546

FAX:

COMMENTS: The proposal to construct a solid waste facility in Hunt County is based upon the singular pursuit of profit for the responsible business entity with no understanding or appreciation that installation of a solid waste facility would impose on the residents of Campbell, Commerce, Greenville, Sulphur Springs and other communities in the broader area. The proposed construction site for the solid waste facility is just off the primary approach to a 133 year old institution of higher education, Texas A&M University-Commerce. Thus, proceeding with this misdirected profit making

proposal for one individual would adversely affect the quality of life for thousands of residents in the area and would degrade the prestige of an institution of higher education that has hosted U.S. Presidents', Texas Governor's, notable authors, accomplished entertainers and other luminaries that have appeared on the TAMJC campus. Highway 24 is the primary approach to Texas A&M University-Commerce campus that enrolls over 12,000 students, many of whom travel on Highway 24 to and from the campus every week day. The substantial increase in traffic that numerous large trucks and other commercial vehicles from the proposed facility that would be traveling through the University campus daily would pose exponential hazards to both faculty, staff and students of the University who traverse Highway 24 each day. TAMUC is the alma mater of the celebrated former Speaker of the U.S. House of Representatives, the Honorable Sam Rayburn (Class of 1903). TAMUC has a distinguished history in the realm of Texas higher education and has overcome myriad challenges during its illustrious 133 year history (the fifth oldest State institution of higher education in the State of Texas). TAMUC was founded a scant 13 years after Texas A&M University in College Station and only 6 years after the University of Texas in Austin. If we were talking about construction of a solid waste facility near either A&M or UT, wonder how far that would go? TAMUC is no different and any proposed business near any institution of note should pause to consider the long term detrimental affects that such a facility would have on a venerable institution of higher education that has existed in a near pristine environment for well over a century. The solid waste facility could easily be constructed in the county that the individual seeking approval for the facility resides (Lamar County). But, as we all know, the quest for monetary gain is encapulated in the perpetual claim that "business is business." Well, even if that is true, all the adversely affected residents, institutions and communities that would be degraded if such a facility is permitted to proceed, have a business as well and the business of the many citizens and communities is one of peaceful and productive existence without resulting in a negative and perpetual influence on anyone else. Whether this proposed solid waste facility is approved or not, the individual seeking that approval will simply move on to another location where his business interests can flourish without interference from opposing sources. But, doing so would not have the broad array of negative consequences that contraction of the facility at the proposed site on Highway 24 would have. Clearly, the individual seeking approval for the facility could not care less of the innumerable adverse consequences that construction of the facility in Campbell, Texas would have in perpetuity for the communities and institutions in the immediate and extended area. Most counties in the State of Texas are not fortunate enough to have a four year comprehensive University. Hunt County has enjoyed the presence and influence of TAMUC now for well over a century and that relationship has produced thousands of local graduates and those from around the world for generations. Texas A&M University-Commerce deserves much better than to have to contend with the myriad negative aspects of this proposed facility as do those who live in and around the proposed construction site. The facility can be easily constructed in a location without the expansive adverse affects that it would have on the residents, businesses and institutions in the area. It simply is not that important to construct this facility in an area that would result in disruption to the quality of life for thousands upon thousands who only wish to live in the peaceful and tranquil rural environment that attracted them the area in the first place. Respectfully submitted, Ted R. Crim Class of 1970 Texas A&M University-Commerce

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, April 4, 2022 7:28 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: lsymb@yahoo.com <lsymb@yahoo.com>
Sent: Sunday, April 3, 2022 2:53 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Yumei N/A Bao

EMAIL: lsymb@yahoo.com

COMPANY: none

ADDRESS: 1369 BRIDLE BLVD
FRISCO TX 75036-4572

PHONE: 4699700011

FAX:

COMMENTS: To place such a big trash collection site at that important location that has so many potentials for much better future growth will absolutely ruin our dream and hope. It can affect the daily life to all residents around that area. This trash site can cause air pollution and water pollution which will affect residents' physical health and mental health. My friends and clients decided not do any investment in cities around that trash collection site. Please move it to somewhere else with low growth potential. It blocks at front entrance. It is not a welcome sign.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, February 14, 2022 10:27 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: kjbrandt@hotmail.com <kjbrandt@hotmail.com>
Sent: Friday, February 11, 2022 4:42 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MS Kathryn Brandt

E-MAIL: kjbrandt@hotmail.com

COMPANY:

ADDRESS: 5829 PRIVATE ROAD 4223
CAMPBELL TX 75422-1827

PHONE: 2143179435

FAX:

COMMENTS: Wondering what water supply company they are using and if there is sufficient water for this business. I'm on a neighboring property and the water supply is a co-op.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, February 18, 2022 7:56 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jemanningdvm@gmail.com <jemanningdvm@gmail.com>
Sent: Thursday, February 17, 2022 4:10 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Jon Manning

E-MAIL: jemanningdvm@gmail.com

COMPANY: Hunt County Animal Hospital

ADDRESS: 3440 STATE HIGHWAY 24
CAMPBELL TX 75422-1290

PHONE: 9038863911

FAX:

COMMENTS: Why is this transfer station needed, there is a landfill within 3 miles of the proposed site? I don't see the necessity of putting a transfer waste facility at this location to drive down land values, increase vehicular accidents on the highway with a landfill 3 miles down the road. Why is it necessary, can they not use this facility to dump their waste? How many of these permits for transfer waste facilities have been denied in the last few years? I am getting the feeling

that this process is for show and that this permit will be decided regardless of any opposition. Why is a four sided building not required for waste transfer facility?

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, February 25, 2022 8:34 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: Stephen.Gilcrest@tamuc.edu <Stephen.Gilcrest@tamuc.edu>
Sent: Friday, February 25, 2022 7:13 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Stephen Gilcrest

E-MAIL: Stephen.Gilcrest@tamuc.edu

COMPANY:

ADDRESS: 447 FM 513 S
CAMPBELL TX 75422-5198

PHONE: 9033550849

FAX:

COMMENTS: This would cause a traffic issue with all the extra truck traffic trying to turn off of HWY 24. This is very busy highway and with the current traffic come out of this pit there have been several near miss accidents, because of trucks pulling out in front of cars. I myself have had a couple near miss accidents with the trucks pulling out of the sand pits in this area. I fell this would be detrimental to the university and to the houses in the area due to the smell and trash being

everywhere. I also feel that there is a risk of contamination of water sources that the agricultural community uses for livestock and to the water aquafer.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, February 25, 2022 2:09 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: amy.braley@tamuc.edu <amy.braley@tamuc.edu>
Sent: Friday, February 25, 2022 12:41 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Amy Braley

E-MAIL: amy.braley@tamuc.edu

COMPANY: Texas A&M University-Commerce

ADDRESS: College of Agricultural Sciences & Natural Resourc P.O. Box 3011
Commerce TX 75429

PHONE: 9038865358

FAX:

COMMENTS: I am in complete opposition to this transfer station. The station will have a negative impact to the university and surrounding individual homeowner properties. The station will cause increased traffic and congestion in front of university property endangering the lives of students and employees of the university. The odor and other nuisances will impact the quality of life. Local property values will be negatively affected. The water supply to the university and community will be adversely impacted.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, February 3, 2022 8:05 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: rmanning7674@sbcglobal.net <rmanning7674@sbcglobal.net>
Sent: Wednesday, February 2, 2022 5:31 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Ronald Manning

E-MAIL: rmanning7674@sbcglobal.net

COMPANY:

ADDRESS: 633 YELLOW BRIDGE RD
VAN ALSTYNE TX 75495-3927

PHONE: 2147964395

FAX:

COMMENTS: Section 3.2 Comments The speed limit for SH 24 near the proposed transfer station is 75MPH in both directions. Per Table I/II3.4 the expected number of crossings per day due to the transfer station will be approximately 348 (174 * 2) for trucks and other vehicles to enter/leave Hwy24 which will create and opportunity for collisions. The highway analysis does not comprehend this danger to the public. It addresses average increases in highway utilization, sight restrictions, but nowhere does it address safety. Currently there is no plan to change HWY 24 to correct this

hazard. Also, when the fully loaded semis/trailers enter SH24 fully loaded, it take more than a trivial amount of distance to reach the speed limit which will generate an opportunity for a rear end collision from cars travelling at the speed limit. This is unacceptable! 3.2.B The length of the queue driveway from SH24 to the transfer station is stated as being 445 feet. A semitruck with a trailer is approximately 70 feet but 10 ft must be added to both ends to insure maneuvering room bringing it to a total of 90 feet for each truck and trailer if only those vehicles are in the queue. That would allow ~ 5 trucks with trailers of that type in the queue. Also the typical trash truck is ~ 30 ft. It is quite possible with 174 unique vehicles (semis/trailers, trash trucks, personal vehicles, & company light vehicles) trying to enter a 1 lane entrance daily, that the entry queue may spill out onto SH24 which would create another safety problem. There needs to be more room for a longer entry queue so that safety would not be impacted.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, February 8, 2022 9:13 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
129147

From: jhudson@turtlecreekinvestments.com <jhudson@turtlecreekinvestments.com>
Sent: Monday, February 7, 2022 8:52 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: James H Hudson

E-MAIL: jhudson@turtlecreekinvestments.com

COMPANY: turtle creek investments

ADDRESS: 3225 TURTLE CREEK BLVD 804
DALLAS TX 75219-5409

PHONE: 9729655071

FAX:

COMMENTS: I own a number of multifamily buildings near the TAMU Campus that provide housing for student residents. The idea of having a solid waste station adjacent to the main road/entrance into the City of Commerce and the University is a Chamber of Commerce nightmare. No City or University wants an environmental polluter at their front door. I am against allowing a solid waste station at this location. A more remote location should be considered.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, February 11, 2022 10:27 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: kjbrandt@hotmail.com <kjbrandt@hotmail.com>
Sent: Thursday, February 10, 2022 5:12 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MS Kathryn Brandt

E-MAIL: kjbrandt@hotmail.com

COMPANY:

ADDRESS: 5829 PRIVATE ROAD 4223
CAMPBELL TX 75422-1827

PHONE: 2143179435

FAX:

COMMENTS: Why did they not correct the figure I/II – 5 when they updated the November version? It still doesn't show my house as residential or my neighbor at 5828 PR 4223 as residential. It also doesn't show the rest of my land as agriculture. If we have Ag exemptions and the land is actively used for hay production, does that not count as agriculture? If they got these drawings wrong, how many other mistakes in this application are there? On page 5 in response to managing noise, they indicate the main source of noise is from the earthmoving operation on the adjacent

property, however on page IV-26 they show they will be using heavy machinery from 4 a.m. to 7 p.m. 6 days a week. In that area they do not indicate that it is the earth moving equipment making the noise. So how loud is heavy machinery? Can the hours be restricted at least to 6a.m.? On page I/II -11 they list the short distance to Campbell and a small population, but don't list Commerce which is probably only a mile further in the other direction with a significantly higher population esp. if you count the students in residence at the University. Page IV-20 – with regard to Fire Protection, are you aware that the city of Campbell has a VOLUNTEER Fire Department? Why should Hunt County be processing neighboring county's trash? They don't take care of their own?

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, January 28, 2022 9:58 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411
Attachments: Section 3,2 commnetsA.docx

MSW
125147

From: rmanning7674@sbcglobal.net <rmanning7674@sbcglobal.net>
Sent: Thursday, January 27, 2022 1:50 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Ronald Manning

E-MAIL: rmanning7674@sbcglobal.net

COMPANY: Bedrock LLC

ADDRESS: 633 YELLOW BRIDGE RD
VAN ALSTYNE TX 75495-3927

PHONE: 2147964395

FAX:

COMMENTS: File attached below.

00157

Section 3.2 Comments

The speed limit for SH 24 near the proposed transfer station is 75MPH in both directions. Per Table I/II-3.4 the expected number of crossings per day due to the transfer station will be approximately 348 (174 * 2) for trucks and other vehicles to enter/leave Hwy24 which will create and opportunity for collisions. The highway analysis does not comprehend this danger to the public. It addresses average increases in highway utilization, sight restrictions, but nowhere does it address safety. Currently there is no plan to change HWY 24 to correct this hazard. Also, when the fully loaded semis/trailers enter SH24 fully loaded, it take more than a trivial amount of distance to reach the speed limit which will generate an opportunity for a rear end collision from cars travelling at the speed limit. This is unacceptable!

3.2.B

The length of the queue driveway from SH24 to the transfer station is stated as being 445 feet. A semi-truck with a trailer is approximately 70 feet but 10 ft must be added to both ends to insure maneuvering room bringing it to a total of 90 feet for each truck and trailer if only those vehicles are in the queue. That would allow ~ 5 trucks/trailers of that type in the queue. Also the typical trash truck is ~ 30 ft. It is quite possible with 174 unique vehicles (semis/trailers, trash trucks, personal vehicles, & company light vehicles) trying to enter a 1 lane entrance asynchronously, that the entry queue may spill out onto SH24 which would create another safety problem. There needs to be more room for a longer entry queue so that safety would not be impacted.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, January 20, 2022 11:39 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: cbreche@yahoo.com <cbreche@yahoo.com>
Sent: Thursday, January 20, 2022 10:53 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christopher Jeremy Brecheisen

E-MAIL: cbreche@yahoo.com

COMPANY: Brecheisen Farm

ADDRESS: 1686 COUNTY ROAD 4208
CAMPBELL TX 75422-1766

PHONE: 9035136875

FAX:

COMMENTS: Respectfully request to be added to any e-mail distro related to this permit application. Does the current permit application as written allow for burning/incineration? If not, could the applicant/owner amend this permit in the future to make burning/incineration an "add-on" capability? If so, this would obviously add to the growing list of health-related risks from this proposed project. Speaking of amending or future add-on capabilities to this permit, can TCEQ provide all of the possible future capabilities that could be added via amendment to this specific permit, as well as how

the local area residents would be notified in the event that this has occurred (i.e. add-ons that were not included in this initial permit application)?

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, January 10, 2022 8:43 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
129147

From: cbreche@yahoo.com <cbreche@yahoo.com>
Sent: Sunday, January 9, 2022 8:45 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christopher Jeremy Brecheisen

E-MAIL: cbreche@yahoo.com

COMPANY: Brecheisen Farm

ADDRESS: 1686 COUNTY ROAD 4208
CAMPBELL TX 75422-1766

PHONE: 9035136875

FAX:

COMMENTS: For those reading this that were not present at our last public meeting, I opened that meeting, by stating that the people in our area are not anti-this particular applicant or even anti solid waste disposal. The trash/waste business is a very important business and modern societies could not operate today without their existence or their problem solvers. To deny that is foolish and no one that I know is doing that. I do not personally know this particular applicant, nor do I have any reason to believe that he's not a decent person simply pursing a business opportunity. As a

matter of fact, several folks I've talked with at our community meeting, who were very cordial and polite BTW, vouched for the character of the applicant, on either a personal or professional level. Additionally, many of us know hard-working people in the waste disposal business who provide CRUCIAL support services to communities like ours every single week of the year! If these folks ever quit or went on strike, we would ALL know it and miss them dearly. My own personal experiences with the professionals in this business locally could not have any better or more professional over the past 6+ years! I intend to restate these sentiments again at our public meeting before we start to focus in on the major concerns and differences we have with this project in our community. Those sentiments and statements can simultaneously be true and exist in a world where the local community is still VERY concerned about their family's health and safety from this project, as well as their personal loss of property values. Those are very much a "thing" and are very important to those of us living, working and raising families in this area. Additionally, I'd like to clearly state that the TCEQ representative we've worked with, Mr. Steve Odil, has been exceptionally responsive and professional to queries at every single turn! My pointed questions for TCEQ have to do with the fact that they, as an agency, are seemingly about to approve a project that could be harmful to my family and our community and for that, and the fact that we taxpayers fund them, the minimum we request in this forum, is that they take the time to answer/clarify our questions and concerns via these public comments. Wherever TCEQ and their experts and/or resources can support our community beyond that, we would certainly welcome it and be very appreciative! Is TCEQ allowed to be more restrictive than the EPA allows, in particular in cases where TCEQ determines that it is in best interest of a Texas community's health and safety to do so? Can you please provide some examples where TCEQ has stepped in and done so, this would really help our community with a better understanding your role in the process? This is relevant on this particular permit, since we're wondering why you didn't coordinate with the applicant on the safer and more modern 4-sided facility with a self-contained ventilation system, which would provide our community with an extra layer of protection from toxic elements (to our air, soil and surface water), potentially created directly by this project. Having examples of where TCEQ has made a situation better for the impacted public, over the industry applicant's initial desires, would be very useful in our understanding of how your agency approached this particular project planned for our community. In a perfect world (and per the EPA direction for a 30-day pre-application public meeting), the applicant would have come and presented his plan to the local community and we could have discussed it in an open and public forum to see if better solutions (siting, design, etc..) could be agreed upon that might make the project more acceptable and safer for our community. There's no guarantee that we would have agreed on every aspect, but the applicant certainly would have made a much better impression locally, than the way we eventually found out about this project. Not sure why, but it would appear that that opportunity never presented itself. Does TCEQ agree with the science that solid waste facilities, and its associated activities, have the potential to cause health and safety threats to life forms (humans, animals or plants) in the areas where they operate? Does TCEQ agree with the science that exposure to toxic elements in the environment can negatively impact the development of fetuses during pregnancy, or be detrimental to the development of young children? Can TCEQ please list the potential threats to the public's personal health and safety, in TCEQ's own words, as it relates to solid waste projects such as this proposed Solid Waste Transfer Station? Can TCEQ comment on the likelihood or probability of these threats occurring (with the associated data they used to come to that conclusion)? I might disagree with TCEQ's conclusion on likelihood or probability of these dangerous possibilities occurring, but I believe it would pertinent, and in the public interest, to have this response for the public record of how you derived your data, so that we better understand TCEQ's role/position and how the agency makes determinations on permit approvals such as the one planned for our community. The TCEQ website guidance seems to help prepare applicants on how to respond to potential community concerns, however, I found little information in regard to addressing the actual threats to health and safety in a format that is advisory in nature or even helpful to concerned Texas who are opposed to toxic projects in their communities. Can TCEQ assist our community with performing baseline tests of area water wells to check for toxin levels prior to project start (maybe at least those within a mile of the project)? There are lots of local residents and families that rely on well water for drinking and bathing and would be very interested (to possibly ease their concerns and stress levels) in the response to this question. Has TCEQ ever assisted a community with a pre-project request such as gathering environmental baseline data? If so, we respectfully request TCEQ provide some examples so that we might best understand our options. Does TCEQ agree that every Texan is equal under the law (and regulations)? In this particular case (permit 2411), approval will signal bias on the side of a single Texan over the quantifiable best interests of hundreds and possibly thousands of Texans. As a point of reference for this project, what percentage of solid waste permit applications have been approved in the past 15-20 years by TCEQ, and what percentage have been denied? Can you please provide TCEQ's reasoning for those permit denials? How will the

extracted liquids from this transfer station be kept/stored on the site in the permit? Will the liquids go into open pits for storage, or will they be in fully sealed containers, or a combination of both? How long are the liquids allowed to remain on site? will the liquids and/or solid always be stored inside the facility or will they also be stored outside of the transfer station building? Where is the intended destination for both the post-processed compacted solid waste as well as the extracted liquids? Is there a plan to intentionally dump the liquids on the ground here locally? Is the applicant even allowed to dump these liquids out onto the ground? Will the facility owner provide a hotline for citizen concerns, aside from the TCEQ offices over in Fort Worth, and if so, what will be the expected turn time for addressing concerns? Will the facility owner commit to notifying local residents if the facility plans to make substantial changes in its business model in the future (e.g., increases in daily trash inputs, acceptance of medical waste, etc.)? Who would be responsible for the extra trash deposited along highway 24 from the addition trash trucks? Will the applicant (as owner) provide periodic opportunities for groups in the community to come in and visually inspect the operations as part of a community neighbor cooperation? Is the applicant willing to make facility design concessions (4-sided modern design versus very 2-sided design), along with some of the requests in the preceding sentences? How would the applicant demonstrate his intent (in writing and binding to future owners) to be a fully engaged good neighbor in this community? If TXDOT says that on and off ramps will be required for the safety of local traffic, who pays for those on/off ramps, the applicant or Texas taxpayers? If TXDOT does require these road improvements, wouldn't TCEQ have just approved an erroneous permit application if the claim is that additional highway on/off ramps are not required? What is TCEQ's response if they approve an application that includes disconnects or violations with other State departments or agency laws, regulations or ordinances? These on/off ramps on highway 24 are a HUGE deal, particularly where this proposed site is located and anyone who has ever driven that road already knows this to be the case. How are these dis-connects addressed post TCEQ permit application approval? In reviewing some of the online literature advising applicants of solid waste projects, I read something about planting new tress and/or other plants or vegetation to help absorb the toxins released into the air. If industry advice seems to acknowledge this vegetative absorption scenario as a fact, what does this mean for area gardeners who consume their backyard produce or fruits and nuts from the trees on their property today? Who is responsible for their future hesitation (based on actual science) to consume those fruits or nuts for fear of health and safety reasons (i.e., an imposed restriction on our ability to enjoy our properties like we did pre-project)? When these situations become realized, who is responsible for our loss of enjoyment and use?

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 28, 2021 9:28 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
126147

From: crossbow.77.jc@gmail.com <crossbow.77.jc@gmail.com>
Sent: Tuesday, December 28, 2021 9:02 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jeffrey W Cross

E-MAIL: crossbow.77.jc@gmail.com

COMPANY:

ADDRESS: 3870 WILDWOOD DR
CAMPBELL TX 75422-1844

PHONE: 9033359936

FAX:

COMMENTS: I have quite a few problems with there being a transfer station 1 mile from my house. To begin with there is already a dump 1 mile in another direction, right down FM1568. The amount of trash that litters HWY 24/50 is too much as it is. Now you want to add more to it with this unregulated station. Second, I have high school age kids and there friends that drive up and down this road and the increased risk to them with more 18 wheelers traveling up and down it is only asking for more accidents as inexperienced drivers compete for road space. Third, there is a large creek

that supplies water to many areas east of 24. This station risks contaminating the ground water and poisoning the local wildlife. Deer roam freely through our yards with little problems and that shouldn't be interfered with. Next, I live due north or your proposed site. South winds in the summer are going to blow every smell right to my house and my neighbors. Last, this gentleman is from Paris and is using a station in Reno. Why bring trash into Commerce then take it to Reno when it could go to Reno first? Thank you for your time Jeffrey Cross

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 28, 2021 8:55 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: babbtown43@gmail.com <babbtown43@gmail.com>
Sent: Sunday, December 26, 2021 5:35 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jimmy Babb

E-MAIL: babbtown43@gmail.com

COMPANY:

ADDRESS: 1441 COUNTY ROAD 4208
CAMPBELL TX 75422-1763

PHONE: 9034568130

FAX:

COMMENTS: The sand pit at the current location has had to stop digging in several spots. They can not contain the water that seeps up from underneath. This tells me that the water table is very high in that location. The waste transfer station will have a high probability of contaminating our water supply. If that happens will the transfer station be held liable for that damage to our water supply. It should. Is TCEQ going to conduct regular water tests and surprise

inspections of the facility? What guarantees do we as citizens have to insure that this doesn't happen. We do not want this transfer station period! _Please deny this application, It is on a main thouroghfare through our community.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 28, 2021 8:51 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jecb64@yahoo.com <jecb64@yahoo.com>
Sent: Friday, December 24, 2021 10:24 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Janice Bickley

E-MAIL: jecb64@yahoo.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034744120

FAX:

COMMENTS: Please deny this permit from ruining our town! The company/owner wanting to turn our town into a trash can would be the first person to rise up against this coming in next to his home/neighborhood/community/town or city— yet he feels like Commerce/Campbell Tx are trash! Please prevent this out of our county trash from being hauled in here & ruining our community-& ruining our property values!!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 28, 2021 8:51 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jecb64@yahoo.com <jecb64@yahoo.com>
Sent: Friday, December 24, 2021 9:37 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Janice Bickley

E-MAIL: jecb64@yahoo.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034744120

FAX:

COMMENTS: Please deny this permit from ruining our town! The company/owner wanting to turn our town into a trash can would be the first person to rise up against this coming in next to his home/neighborhood/community/town or city— yet he feels like Commerce/Campbell Tx are trash! Please prevent this out of our county trash from being hauled in here & ruining our community-& ruining our property values!!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 28, 2021 9:34 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: cdcertain@yahoo.com <cdcertain@yahoo.com>
Sent: Monday, December 27, 2021 10:28 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Cathy Certain

E-MAIL: cdcertain@yahoo.com

COMPANY:

ADDRESS: PO BOX 96
CAMPBELL TX 75422-0096

PHONE: 9034132204

FAX:

COMMENTS: It is completely wrong to allow this "temporary" dump site into our community. No one should be expected to put up with this sort of mess in their home. This business wants to bring in garbage from all over and leave it with us to put up with until it's financially good for them to move it, and then bring in more and do it all over again. Let them put something like this on their own property in their own community. It's wrong of them to foist it off on others

for their own financial gain. No taxes or payments are worth it and cannot cover the destruction of lifestyles it will impact.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 30, 2021 1:02 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: tibb000@gmail.com <tibb000@gmail.com>
Sent: Thursday, December 30, 2021 10:17 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Kevin Tibboel

E-MAIL: tibb000@gmail.com

COMPANY:

ADDRESS: 4040 MEADOWVIEW DR
CAMPBELL TX 75422-1872

PHONE: 9034561997

FAX:

COMMENTS: The proposed location of this Solid Waste Station is now excluded by and would be in direct violation of Hunt County Ordinance passed 12/28/2021 for new solid waste stations within 2,640 feet of a residence. The Hunt County ordinance can be viewed at: https://www.huntcounty.net/upload/page/8963/docs/PUBLIC%20NOTICE%20-%20Hunt%20County%20Landfill%20Regulations.pdf

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, January 5, 2022 9:39 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

PM

From: cbreche@yahoo.com <cbreche@yahoo.com>
Sent: Tuesday, January 4, 2022 5:17 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christopher Jeremy Brecheisen

E-MAIL: cbreche@yahoo.com

COMPANY: Brecheisen Farm

ADDRESS: 1686 COUNTY ROAD 4208
CAMPBELL TX 75422-1766

PHONE: 9035136875

FAX:

COMMENTS: Has the applicant already sold this proposed Solid Waste Transfer Station project or is he in current discussions to sell it? This is a highly relevant question since the public needs to know this status for when the applicant addresses questions or makes "commitments" during future public the meeting(s), where his responses will not be credible/binding if he is no longer the owner, or if he will not be the owner shortly after project approval. The community is already quite concerned that this project application is from someone outside of our County, outside our

TX Representative district and outside our TX Senate district, however, we could end up with an even worse detached "owner" situation where the new owner could be from out of State or even outside the country. In NONE of the aforementioned scenarios do any of these "owners" have any local skin in the game when it comes to the MANY negative health and safety impacts this project would cause our families and community. I'm going to assume that the applicant does not live within three miles of a Solid Waste Transfer Station. If that is correct, then the applicant has no experience living right next to one (where his kids/grandkids might play outside routinely breaching in the air, or where he grills his family's food outside (like our community will have to deal with if this substandard project is allowed to go forward)) and he therefore has no credibility as to what it is like or just how bad it actually is to live near one. At our recent community meeting on this issue, we had a significant amount of VERY CONCERNED mothers who live near the proposed site and have plenty to say about the health and safety of their children. I look forward to having their voices and concerns heard. I have little doubt that the applicant would, along with his community (valuing health and safety), fight strongly to oppose having one of these Solid Waste Transfer Stations go in a few hundred or a few thousand feet from where he and his family lives (and I would support his right to oppose it and protect his family and community), exactly like the people in our community are and will continue doing going forward. I'm told that the Waste Transfer Stations near North Park Mall and over near Plano, are four-sided designs and have ventilation systems to lessen the exposure of the toxic impact of solid waste to local residences and businesses near there. Four-sided facilities with ventilation systems would appear to be a design STANDARD to protect local residents in North Texas from many of the negative health effects that solid waste facilities can cause. Why then is this project proposing a SUB-standard Transfer Station design with only two sides, thus exposing local residents to far more damaging effects of solid waste exposure than those other North Texas communities are subject to due to their safer and more modern designed facilities? This appears to be a complete disrespect and disregard for the health, safety and well-being of those living and working in our small local community. Safer designs exist and are in use in the regional area, but were apparently not considered for this project proposed for our small rural community. The assumption would be that regard for our family's health and safety was traded for design costs. Does the applicant use a two-sided or four-sided trash can (with a lid on top) at his own home and/or place of business? If he's using standard four-sided trash cans with lids for the temporary storage of his personal and/or business office solid waste, why hasn't he converted those plastic cans/dumpsters into two-sided trash cans with only a lid on top? You know, like the two-sided Waste Transfer Station he is proposing for our community? He could save money by not including the other two sides of his trash cans, however, I bet the smell at his house and office would be MUCH worse and the local racoons, stray dogs/cats, flies, disease vectors, blowing winds, etc.. would have much more negative affects on his own solid waste disposal issues. That is essentially the exact scenario for what is proposed for our community. Within about three miles of where this proposed Waste Transfer Station is planned for, I understand that TCEQ has already previously approved two local landfills: Maloy/Republic Landfill which is active today and the City of Commerce Landfill which I understand might currently be in a closed or inactive status. It would appear that our area has been targeted and is being taken advantage of due to being in a lower socioeconomic rural area. Does TCEQ take these factors into consideration when approving projects? Once these projects are approved and go forward, the local land they sit on is irrevocably damaged for all time, with the surrounding property values are permanently negatively impacted. Our small rural community has already taken-on an unfair burden with solid waste disposal projects and we should not be subject to even more local area land degradation, simply because our area is rural and not affluent. Using Google search, one can find that where many Solid Waste projects have been located, there have been observed upticks in cancer rates, respiratory issues, vector related diseases and traffic accidents (due to the increase of big trucks going in and out of the facilities). Who will be responsible for these known health and safety problems that can easily be traced directly back to this project, if approved? Is it the applicant with his numerous LLCs? The next owner with his/her numerous LLCs? TCEQ? If we know from the statistics, that there is a very high probability that people WILL suffer increased health problems and injuries and even death from this project's directly related traffic accidents, who is responsible? The answer can't be no one. We were here first and it is YOU who are bringing health and safety problems to our community. If you believe that both the applicant and TCEQ are blameless and not liable for these obvious and known risks, I would simply like for both (Applicant and TCEQ) to standup at our future public meeting and clearly proclaim that you believe that you bare no responsibility for the direct results of your actions, so that everyone there knows where everyone in this situation stands on the topic. I would also like for this comment and the responses to it to be part of the permanent public record for when, not if, people in our community are hurt or killed (thru toxicity, disease or traffic accidents) due directly to hazards associated to this project. I will be happy to refer future unfortunate victims and/or their families, related to this project's hazards, back to this

question and subsequent answer from both parties. Similar questions to above, who is responsible for the significant loss of property values that will impact me and my family personally, as well as all of my neighbors for miles around? In addition to our own personal loss of value on our properties, Hunt County will also see a significant reduction in property taxes collected, corresponding to the drop in our personal property values. One side of this equations gains substantially (the side not living anywhere near this project), while the other side loses substantially (those raising families here long before this project). And what did local residents do to deserve such significant losses in the value of our homes and land? Well, our families bought homes here anywhere from 1-100+ years ago, we raised families, worked hard, served our country and paid our taxes. And for that (living the American dream), I anticipate that we're going to lose millions in property values in the local area. Again, we were here first. This project will no doubt cause a significant loss of value for hard working Texans and put our family's health and safety at risk.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, January 7, 2022 10:45 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: cbreche@yahoo.com <cbreche@yahoo.com>
Sent: Friday, January 7, 2022 1:34 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christopher Jeremy Brecheisen

E-MAIL: cbreche@yahoo.com

COMPANY: Brecheisen Farm

ADDRESS: 1686 COUNTY ROAD 4208
CAMPBELL TX 75422-1766

PHONE: 9035136875

FAX:

COMMENTS: In doing research on both public and private nuisance regulations and citizen rights, as they relate to my (and our neighbors) rights and expectations under the law regarding interference from others with our legal rights to enjoy our property (fresh air), I came across the following reference: https://www.epa.gov/sips-tx/texas-sip-30-tac-1014-nuisance-general-air-quality-rules#:~:text=01%20No%20person%20shall%20discharge,with%20the%20normal%20use%20and . From the preceding

reference, it states: "No person shall discharge from any source whatsoever, one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." Does TCEQ support & comply with the "Texas SIP: 30 TAC 101.4: Nuisance General Air Quality Rules"? If so, and TCEQ does believe that residents of Texas have a legal right to enjoy fresh on their already existing property, without interference from another entity, an entity in this case whose sole stated purpose of their project will be to compact solid waste (unknown chemicals) and provably release dangerous toxic & unknown particles into our local air, at SIGNIFICANTLY higher levels that are being released today (i.e., zero). Today, I'm not smelling any odors or toxins when I step outside to look at the stars or grill food on the patio, does TCEQ believe that this facility has a right to negatively change that and that I should then be expected to endure odors or for toxic particles falling on the food we eat? What TCEQ is responsible for and what does TCEQ expect from us with regard to gathering data and quantifying nuisance violations. Will TCEQ provide our community with the proper air quality sampling equipment that we'll need to prove/demonstrate interference with our clean air & rights to enjoy our property free from the toxic and dangerous hazards from this project? If so, can you provide multiple kits so we can distribute in different areas so that our continuous data collection can be optimized and our reports more detailed? I'm told that there are odor detectors that can quantify the odor levels, as well as detectors that can capture the levels of poisonous chemicals released in the air (e.g., hydrogen sulfide). I would also be interested in water, soil and plant/vegetation-based testers that we can use to sample area ponds, dirt and plants for comparison data over the course of months and/or years to help build our reports. If TCEQ cannot provide kits, then why not? If its budget based, this might be a good legislative action, with the reasoning being that when our State environmental regulators/experts tell residents that nothing harmful will happen to us as a direct result of their decisions, then the onus should be on that agency to provide the continuous monitoring to prove those statements factually to residents. If you cannot provide the equipment directly, certainly TCEQ has the proper experts on staff that can recommend industry standard equipment by part #, which could at least help us if we need to engage with our County Environmental officials to see how they might be able to support the purchase of this equipment. Additionally, can TCEQ recommend any Texas based organizations that have assisted with this type of environmental air quality sampling, so that we can start off working with the best & the most experienced folks in the field? We have already engaged with experts from outside the State, however, I would like to add some knowledgeable Texans to our team of experts. I assume that being the State's environmental experts, that you already know & are familiar with the outside experts that can help advise us. We would be very appreciative of the TCEQ if you could please answer the above questions with as much detail as possible (e.g., part #, organizational POCs with office numbers, etc..). Is TCEQ allowed to move forward accepting a certain level of risk to Texan's personal health and safety (unbeknownst to us), and if so, what documented authorities are you using to accept that risk for our health and safety? If so, can you please provide those references. Can you confirm that your permit process isn't simply be an educated guess where a certain level of harm to local residences is considered "acceptable" to TECQ? Does TCEQ utilize any sort of acceptable level of health risk matrix that they use to make their decisions? When was the last time that the major content change (not simple formatting) of TCEQ's Transfer Station application was made? What were those changes? How often do experts review it to ensure that it stays up to date with modern environmental science, or does it only change when legislation changes? Have the most recent substantial updates been driven by advances in environmental science or by the waste industry? Who will be responsible if/when our farm animals start getting sick and/or die at a usually or noticeably higher rate than prior to project approval? How about if our trees or vegetation starts to die off? Since this permit application allows for the processing of bio-hazard medical waste, what stops this facility from accepting masses of amounts of it, from say the DFW metroplex, thus exposing local area residents to even more potential health issues? Is TCEQ unequivocally guaranteeing local residents will not suffer any adverse health problems as a result of this project from bio-hazard medical waste? If so, how can you be so sure, and if not, how can you approve the project? Who will responsible when people's health is adversely affected by this project? Since by virtue of application approval, TCEQ is in effect validating the health and safety of released bio-medical waste particles into the air from compacted medical waste, we would appreciate if you would provide us with the relevant safety data, literature and/or peer reviewed papers you utilized to come to your conclusion? Aside from air quality issues and harms, what if birds carry bloody bio-hazard materials out of the substandard two-sided transfer station and into our yards and it causes us health problems and/or significant stress from the constant threat/worry? What if a child picks up a syringe dropped in their yard from a bird or other vector? Who will be responsible? If no guarantee can be made, why not, and how can you in good conscience and under the law approve this project that is planned so close to so many rural

residents? Is TCEQ aware that safer four-sided transfer stations with ventilation system designs exist and are already in use right here in North Texas? If so, why didn't TCEQ insist on the safer and more modern design for our rural community? Does TCEQ play no role in enforcing safer designs? Why hasn't TCEQ taken reasonable precautions to protect the health and safety of our community by insisting on the safer more modern four-side facility with ventilation? Does this have anything to do with the fact that we are a small rural area that is less affluent than these areas that ended up building the safer more modern facilities? Is the Waste Transfer Station allowed to process anything they wish to at this facility (e.g., radioactive material, dangerous cancer-causing pesticides such as Roundup, etc.)? If not, are they required to inspect even single article that comes thru their facility (e.g., go thru every single trash bag) to ensure that this doesn't happen? If not, how do we know that they are not regularly violating their permit and the law by routinely releasing even more toxic and more dangerous particles into the air than you'd already be giving them license to do under this permit? By acknowledging that there is really NO WAY to prevent this from happening at this facility, isn't TCEQ turning a blind eye to this reality and as a direct result putting even more risk to the health and safety of area residents? If there is a full proof checklist that ensures that TCEQ guarantees that this will absolutely never happen at this facility, can you please provide us with that document? If not, I'm going to assume that this will probably occur every single day that transfer station is open and it will be me and my family that will be breathing it in a regular on a regular basis. Our family lives inside a mile from this planned toxic facility, and we've lived here for more than six years (since I retired from the USAF and made North Texas our home). We routinely grill our food outside 3-5 times a week. We routinely go outside and marvel at the stars on clear Texas nights. We're in our sixth year of running a small organic farm. We have a significant amount of farm animals and a significant amount of open garden area and a greenhouse and this project WILL absolutely negatively affect our family's life and our ability to enjoy our property and everything that goes with that. Who is responsible for disrupting our lives like this? Please note all of your responses on paper so that they can be made part of the permanent public record.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:30 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: tarrantcowboy@gmail.com <tarrantcowboy@gmail.com>
Sent: Monday, December 20, 2021 8:33 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Keith R Tarrant

E-MAIL: tarrantcowboy@gmail.com

COMPANY:

ADDRESS: 2006 FM 3218
CAMPBELL TX 75422-2272

PHONE: 9034567419

FAX:

COMMENTS: My concerns with this transfer site are how it will affect the water supply in the area,and the smell that will permeate the area. The town of Campbell relies on well water found in the aquifers that are in this part of the country, how will another waste site impact that? They found water at the potential transfer site, and that puts this site at greater risk of contaminating the water supply of the surrounding area. The smell that will blanket over the area will

be very jarring for the community, who wants to smell hot trash in the middle of July or August in Texas? Certainly not our friends and neighbors.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:30 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: rharp72@yahoo.com <rharp72@yahoo.com>
Sent: Monday, December 20, 2021 11:01 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Randy Harp

E-MAIL: rharp72@yahoo.com

COMPANY:

ADDRESS: 64 DOLLY RD
SULPHUR SPRINGS TX 75482-6978

PHONE: 2544854295

FAX:

COMMENTS: I oppose the permit for the Transfer Station between Commerce and Campbell Texas (on Hwy 24). This will be a safety hazard for many due to the 75 MPH and the number of people, especially students at Texas A&M Commerce entering and exiting at the same crossroad at the proposed transfer station. This will be a TXDOT issue that will be critical to the safety of everyone traveling on HWY 24. I am also concerned with the lack of planning for controlling waste effluent and the water table. In addition, the trash associated and odor of the so called "dump" will not be

conducive for an educational environment for a university of the Texas A&M system. In addition, this will have a negative impact on property values for surrounding citizens currently living next door and in the immediate area. There are a lot more negatives associated with this permit request for Hunt County residents than a small group of investors who do not live in this area or county. Allow them to build this near their home instead of near others.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:23 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Patrick.etie@tesservice.com <Patrick.etie@tesservice.com>
Sent: Sunday, December 19, 2021 12:36 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Patrick Etie

E-MAIL: Patrick.etie@tesservice.com

COMPANY:

ADDRESS: 2013 COUNTY ROAD 4312
CAMPBELL TX 75422-2211

PHONE: 8179074375

FAX:

COMMENTS: This transfer station should not be built for so many reasons: -Environmental concerns at the highest level -Property values will plummet -Major increase in traffic coming from I-30 up SH 24 and then through Commerce. Local school buses and university kids, parents, emergency personnel -Major eye sore for the city of Commerce and the university.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:21 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Michelle11contreras@gmail.com <Michelle11contreras@gmail.com>
Sent: Sunday, December 19, 2021 7:55 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Brenda Michelle Contreras

E-MAIL: Michelle11contreras@gmail.com

COMPANY:

ADDRESS: 1110 S PATTERSON ST
CAMPBELL TX 75422-2805

PHONE: 4692300786

FAX:

COMMENTS: Please don't allow them to put that plant here there's a lot of children in our area and this can damage our environment we live far from the city for a reason

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:21 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: leslee.lay@sbcglobal.net <leslee.lay@sbcglobal.net>
Sent: Sunday, December 19, 2021 6:54 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS LesLee Lay

E-MAIL: leslee.lay@sbcglobal.net

COMPANY: A PC Geek

ADDRESS: 2608 TAYLOR ST
COMMERCE TX 75428-3818

PHONE: 2145426362

FAX:

COMMENTS: Please do not build this waste facility. That stretch of road is beautiful. It has an animal preserve on it. All the waste and chemicals will damage the environment and harm our health.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:21 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Efwofford@gmail.com <Efwofford@gmail.com>
Sent: Sunday, December 19, 2021 2:29 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Echo Wofford

E-MAIL: Efwofford@gmail.com

COMPANY: Echoes

ADDRESS: 1415 PARK ST
COMMERCE TX 75428-3051

PHONE: 4693299607

FAX:

COMMENTS: I don't want hazardous waste near my children. This area is bad enough.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:14 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: lonestarlizzy@gmail.com <lonestarlizzy@gmail.com>
Sent: Saturday, December 18, 2021 6:20 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Liz Medina

E-MAIL: lonestarlizzy@gmail.com

COMPANY:

ADDRESS: 7070 STATE HIGHWAY 24
COMMERCE TX 75428-5820

PHONE: 4698786690

FAX:

COMMENTS: Please understand as a neighbor community to a booming north east Texas we cannot accept the use of this land as a landfill. There are too many important investments in the county and City of Commerce including the expansions in Texas A&M to allow the addition of what could be a hazardous waste disposal process opening the community to liabilities when our focus should be on growth and community sustainability for peers sakes Texas A&M Commerce is know for its agricultural departments.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:10 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Crbeane52@gmail.com <Crbeane52@gmail.com>
Sent: Saturday, December 18, 2021 7:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Cathy Beane

E-MAIL: Crbeane52@gmail.com

COMPANY:

ADDRESS: 2635 COUNTY ROAD 4312
CAMPBELL TX 75422-2201

PHONE: 9033661749

FAX:

COMMENTS: I am totally against implementing any type of waste treatment plant. I do not want a toxic treatment plant because I fear that the health and well being of residents , farm animals, wildlife and crops will be impacted. We already have a sand and gravel pit on the same road. We do not need an increase of traffic on this two lane highway. As a realtor, I can guarantee that property values will drop dramatically. Please do not allow this treatment facility to take place.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:09 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: nickelle23@hotmail.com <nickelle23@hotmail.com>
Sent: Saturday, December 18, 2021 10:46 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Tandy Hagar

E-MAIL: nickelle23@hotmail.com

COMPANY:

ADDRESS: 4648 COUNTY ROAD 3111
CAMPBELL TX 75422-3208

PHONE: 9034615306

FAX:

COMMENTS: I have concerns about the Aquifer that could be exposed harmful chemical from the trash transfer station, my home and thousands of homes and areas business depend on it

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:07 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: karenmarie78.kh@gmail.com <karenmarie78.kh@gmail.com>
Sent: Saturday, December 18, 2021 6:09 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Karen Marie Hammons

E-MAIL: karenmarie78.kh@gmail.com

COMPANY:

ADDRESS: 501 PARK ST
COMMERCE TX 75428-2117

PHONE: 9034412409

FAX:

COMMENTS: Please do not put the Trash Level 5 waste dump in our county. That is hazardous for everyone in the area.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:07 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Bulababe14@yahoo.com <Bulababe14@yahoo.com>
Sent: Saturday, December 18, 2021 5:44 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Alicia Guerra

E-MAIL: Bulababe14@yahoo.com

COMPANY:

ADDRESS: 4626 COUNTY ROAD 4206
CAMPBELL TX 75422-1246

PHONE: 9727932538

FAX:

COMMENTS: Please don't bring this to our city. It will affect the children that plan to live here, animals that we raise to live. Our water system which barely has chemicals.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:07 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Christina.bales@yahoo.com <Christina.bales@yahoo.com>
Sent: Saturday, December 18, 2021 5:35 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christy Andrzejewski

E-MAIL: Christina.bales@yahoo.com

COMPANY:

ADDRESS: 1042 COUNTY ROAD 4109
GREENVILLE TX 75401-1103

PHONE: 8179998590

FAX:

COMMENTS: Im not ok with a dump station going in so close to my home/farm. I raise my own livestock for consumption and we pump our own well water. I moved out here from the city to her awaynfrom the hazardous material, smells, toxins and traffic. I live directly off hwy 24 and this will also increase the traffic and the likely hood of fatality accidents. Please consider putting this elsewhere. We dont want it!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:06 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: vickiemwood@gmail.com <vickiemwood@gmail.com>
Sent: Saturday, December 18, 2021 4:19 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Vickie Wood

E-MAIL: vickiemwood@gmail.com

COMPANY:

ADDRESS: 1611 PARK ST
COMMERCE TX 75428-3053

PHONE: 9034131258

FAX:

COMMENTS: There is absolutely no reason to bring such a facility to the Campbell/Commerce area. Commerce already has issues with water safety and bringing such a terrible business into an area where there is so much nature and a preserve is utterly ridiculous.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:04 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: sfisher0325@yahoo.com <sfisher0325@yahoo.com>
Sent: Saturday, December 18, 2021 10:51 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Sharon Fisher

E-MAIL: sfisher0325@yahoo.com

COMPANY:

ADDRESS: 1804 MORSE ST
COMMERCE TX 75428-3152

PHONE: 9035172630

FAX:

COMMENTS: I'm against this station in my county (Hunt)

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 8:59 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Amanda.l.adams@gmail.com <Amanda.l.adams@gmail.com>
Sent: Thursday, December 16, 2021 8:19 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Amanda Adams

E-MAIL: Amanda.l.adams@gmail.com

COMPANY:

ADDRESS: 5645 E INTERSTATE 30
CAMPBELL TX 75422-2747

PHONE: 9034221344

FAX:

COMMENTS: This will be an eyesore to the community as proposed. It is on a busy highway, just a few miles from a university and grade schools. My property value will decrease and it will discourage the growth in the area. The current plan does nothing to address any benefits for the community.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:03 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: babbtown43@gmail.com <babbtown43@gmail.com>
Sent: Saturday, December 18, 2021 9:48 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jimmy Babb

E-MAIL: babbtown43@gmail.com

COMPANY:

ADDRESS: 1441 COUNTY ROAD 4208
CAMPBELL TX 75422-1763

PHONE: 9034568130

FAX:

COMMENTS: If you grant this permit it will be the perfect solution to the areas West of Hunt County. BUT, it will be the perfect crime against the citizens of the immediate area and Hunt County. My biggest concern, will you hold this company accountable for all the surrounding destruction they will cause. A deceleration and acceleration lane of at least 200 yards would need to be built to help the traffic flow and even with that I am certain there will be a lot of accidents with loss of Life and property.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:02 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jecb64@yahoo.com <jecb64@yahoo.com>
Sent: Friday, December 17, 2021 10:59 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Janice Bickley

E-MAIL: jecb64@yahoo.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034744120

FAX:

COMMENTS: Please stop this permit from being approved!!! If a fire involves a large waste pile or a structure, copious amounts of water will need to be applied in order to control the situation and to prevent rekindling. If the ground surface of the facility is impermeable (concrete or asphalt), this water will run into on-site drainage structures, or may run off site. Such runoff may be impacted with environmentally harmful materials, depending on what was on fire and what materials are handled at the transfer station.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 11:00 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Cassie.fritzky@hotmail.com <Cassie.fritzky@hotmail.com>
Sent: Friday, December 17, 2021 7:24 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Cassie Fritzky

E-MAIL: Cassie.fritzky@hotmail.com

COMPANY:

ADDRESS: 712 S PATTERSON ST
CAMPBELL TX 75422-2851

PHONE: 7049183490

FAX:

COMMENTS: I contest against this permit in our community. I do not want this company in Campbell/Commerce.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 10:56 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jecb64@yahoo.com <jecb64@yahoo.com>
Sent: Friday, December 17, 2021 2:26 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Janice Bickley

E-MAIL: jecb64@yahoo.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034744120

FAX:

COMMENTS: Please stop this permit from being approved!!! If a fire involves a large waste pile or a structure, copious amounts of water will need to be applied in order to control the situation and to prevent rekindling. If the ground surface of the facility is impermeable (concrete or asphalt), this water will run into on-site drainage structures, or may run off site. Such runoff may be impacted with environmentally harmful materials, depending on what was on fire and what materials are handled at the transfer station.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 10:56 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: hulktarrantbeccah@gmail.com <hulktarrantbeccah@gmail.com>
Sent: Friday, December 17, 2021 1:59 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MS Reabeccah L Tarrant

E-MAIL: hulktarrantbeccah@gmail.com

COMPANY:

ADDRESS: 2006 FM 3218
CAMPBELL TX 75422-2272

PHONE: 9034951560

FAX:

COMMENTS: This transfer station would not only impact the health and well-being of the people who live in this part of North-East Texas but it would affect the water,the animals,and the level of pollution in the area. I am a young inhabitant of this area, and my family has been here for many generations. I do not want to even picture the outcome of this application being approved because it would undoubtedly be catastrophic to all living in this area. This town already has a dump that many people are not very fond of and it just keeps growing every year, what will happen to this 5.9 acre

waste transfer station in a couple of years? Will it grow exponentially like the one that is already present? I do not believe that it is wise to implement this station in this county, because it will be harmful to our way of life. The hot Texas summers will exacerbate the foul smell of waste for miles around, the vehicles that transfer the waste will have trash falling off and onto the roads, creating hazards, and the waste will permeate the ground and leech into the water systems. No matter how good the proposers make it sound, this site would be detrimental to the citizens surrounding it. The applicant can submit every possible way to keep the transfer station safe, but will it actually hold up if this site gets approved? I want my children to be able to grow up in this area and be proud to call it home,and I don't believe that will be possible if this is approved.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 20, 2021 10:55 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: bixlucky@gmail.com <bixlucky@gmail.com>
Sent: Friday, December 17, 2021 1:48 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dave Bickley

E-MAIL: bixlucky@gmail.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034131172

FAX:

COMMENTS: a solid waste transfer station could cause a hazardous situation in the event of a fire, which isn't uncommon at these types of facilities. It's not known whether the small volunteer force at the Campbell VFD would be able to handle a potentially toxic fire at this location. If a fire did occur, the resulting noxious smoke and fumes would surely drift across the adjacent family homes and the satellite campuses that surround this property, creating a dangerous situation for students and residents. Additionally the runoff from a fire-fighting operation at this location

could spread environmentally unsafe substances and chemicals from aerosols, paints, batteries, etc onto the nearby properties and possibly leech into the groundwater

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 21, 2021 8:24 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: morse.chelsea09@yahoo.com <morse.chelsea09@yahoo.com>
Sent: Monday, December 20, 2021 4:10 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Chelsea Morse

E-MAIL: morse.chelsea09@yahoo.com

COMPANY:

ADDRESS: 1505 ARP ST
COMMERCE TX 75428-2509

PHONE: 4694283753

FAX:

COMMENTS: We don't need this dumping site in our area!! There are livestock & families!! Keep Campbell & Commerce free of all the nasty hazardous toxins!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 21, 2021 8:24 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: morse.chelsea09@yahoo.com <morse.chelsea09@yahoo.com>
Sent: Monday, December 20, 2021 6:45 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Chelsea Morse

E-MAIL: morse.chelsea09@yahoo.com

COMPANY:

ADDRESS: 1505 ARP ST
COMMERCE TX 75428-2509

PHONE: 4694283753

FAX:

COMMENTS: We don't need this dumping site in our area!! There are livestock & families!! Keep Campbell & Commerce free of all the nasty hazardous toxins!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 21, 2021 8:23 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: katharine.knoodle@gmail.com <katharine.knoodle@gmail.com>
Sent: Tuesday, December 21, 2021 1:39 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Katharine Knoodle

E-MAIL: katharine.knoodle@gmail.com

COMPANY:

ADDRESS: 858 COUNTY ROAD 3101
GREENVILLE TX 75402-8814

PHONE: 9729224450

FAX:

COMMENTS: Please don't build a level 5 dump here

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 21, 2021 10:46 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: et100103@gmail.com <et100103@gmail.com>
Sent: Tuesday, December 21, 2021 10:12 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MS Elizabeth Raylynn Tarrant

E-MAIL: et100103@gmail.com

COMPANY:

ADDRESS: 2006 FM 3218
CAMPBELL TX 75422-2272

PHONE: 2544133880

FAX:

COMMENTS: I am writing to you today in hopes that the proposed waste facility in my hometown will not be built/come to fruition. The facility will be right above our water supply and severely affect the quality of our water. Not to mention the smell it will create during the hot months of the year. This facility will directly affect my community's way of life. We are an agricultural community that depends heavily on a clean and continuing water supply. Establishing a facility such as this would be absolutely catastrophic. My cousins, siblings, and myself stand to inherit my family's 400+ acres of land,

we have 8 generations of our family tied to this area...since before the Texas Revolution. This area already has an established landfill that everyone despises. It has grown exponentially since it was put in and creates hazardous conditions. Is this what we are to expect with this 5.9 acre waste facility? More hazardous living conditions, foul smells for miles, worn out infrastructure due to dump trucks constantly traveling on country roads not meant for them? Will my family or I develop cancer or other illness due to the chemical waste being carelessly dumped in our area? Is the state looking to have more costly lawsuits on their hands? Please for the love of all things Texas, do not approve this proposal. It would be detrimental to Northeast Texas. Thank you for your time, Elizabeth Tarrant 2006 FM 3218 Campbell, TX 75422

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 21, 2021 10:45 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: mrudintamuc@gmail.com <mrudintamuc@gmail.com>
Sent: Tuesday, December 21, 2021 9:33 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Mark Rudin

E-MAIL: mrudintamuc@gmail.com

COMPANY:

ADDRESS: 1701 Education Drive
Commerce TX 75428

PHONE: 2083403344

FAX:

COMMENTS: As someone who travels Highway 24 on a regular basis, I am concerned about having 100s of additional trucks using the highway on a daily basis to deliver trash to the proposed waster transfer station. There are also many students who attend the university in Commerce that use the highway on a daily basis. Due to several factors, including the posted speed limit, and difficulty seeing turnoffs from the road, I am not convinced the proposed operators of the facility have truly worked with TXDOT to address these issues.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 21, 2021 10:45 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: sutherl@swbell.net <sutherl@swbell.net>
Sent: Tuesday, December 21, 2021 9:02 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Lynn C Sutherland

E-MAIL: sutherl@swbell.net

COMPANY:

ADDRESS: 1507 S PATTERSON ST
CAMPBELL TX 75422-2810

PHONE: 9038622712

FAX:

COMMENTS: I am very concerned about the addition of the transfer station in Campbell for various reasons: 1. It is to be located on top of the aquifer that supplies water to all of Campbell and outlying areas not to mention private wells. 2. Increased traffic of heavy vehicles will cause wear and tear on Highway 24 that will increase taxpayer expense. 3. Increased traffic of heavy vehicles will increase accidents on Highway 24 when our local volunteer fire station is already stretched thin. 4. The odor and vermin will further adversely affect quality of life in and around Campbell as well as

property values. 5. The decreased property values will result in decreasing property tax income for the county. 6. It is my understanding that the location isn't adhering to health and safety requirements already, so why would be expect them to when there will be even more dire consequences to unsecured waste. 7. Extruded liquid must be stored somewhere at least temporarily, and that liquid can leak into the ground/aquifer. 8. The owners are expecting to profit for themselves by bringing waste to Hunt County that is not generated in Hunt County but will be detrimental to the citizens of Hunt County. 9. The location is around various Texas A&M-Commerce facilities and where many students travel. 10. The waste will be transported through towns increasing traffic congestion and the likelihood of even more accidents.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, December 22, 2021 10:20 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: tedcrim1947@gmail.com <tedcrim1947@gmail.com>
Sent: Wednesday, December 22, 2021 9:45 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Ted Ray Crim

E-MAIL: tedcrim1947@gmail.com

COMPANY:

ADDRESS: 2313 NEWCASTLE CIR
PLANO TX 75075-3328

PHONE: 9729641546

FAX:

COMMENTS: I would like to register my opposition to the proposed solid waste facility on Highway 24 near Campbell and Texas A&M University-Commerce in Commerce, Texas. The installation of this ill advised facility would degrade the environmental quality of the land, air and water with trash inevitably falling off of the endless procession of large waste trucks on Highway 24 that would require transit of waste material directly through Texas A&M University-Commerce itself that lies on both sides of Highway 24. Texas A&M University-Commerce was founded in 1889 and is a

comprehensive four year University that provides a vast array of academic programs and disciplines that only a top tier institution of higher education could provide. The University has produced numerous notable graduates including national historical figure, Sam Rayburn, Speaker of the U.S. House of Representatives longer than any other Speaker of the House. In addition, the University farm is immediately adjacent to this proposed waste facility that would degrade and possibly foreclose farm and animal operations and research that is conducted daily within feet of the proposed waste plant. The perpetual flow of large waste trucks both adjacent to the University research farm and their transit on Highway 24 would substantially increase the rate of traffic on Highway 24, pose a health hazard to residents in the surrounding communities, towns and cities that have existed in a relatively bucolic and largely pristine area for centuries. Texas A&M University-Commerce is, as noted, a comprehensive institution of higher education with an extensive active research programs that are pursued daily both on campus and at the nearby University farm. Not only would the environmental integrity of the proposed waste facility degrade the air, water and soil of the immediate and broader area, it would present a visual and environmental assault on an area that has been largely undisturbed for centuries. Moreover, as the perpetrators of this ill advised project seek approval for their solid waste facility, there has been NO credible or licensed environmental quality impact study completed to fully assess the broad adverse affect this dreadful waste facility would bring to the area. Of course, there are numerous other sites more rural and distant with minimal direct impact on the local quality of life that have never even been considered. And, of course, the people who want this project approved, will obtain approval for it somewhere, just not Highway 24, Campbell, Commerce, Greenville and Sulphur Springs, Texas. Local residents, the thousands of University students', staff and faculty of the University who traverse Highway 24 daily not to mention the many notable guests to the University that has included U.S. President's, political leaders', author's, entertainers' and other luminaries that, of course, would have to pass close by the unsightly and oderous solid waste facility. A comprehensive environmental evaluation study should negate construction of this dreadful waste facility before it is even considered. I doubt that doing an environmental study PRIOR to any approval for the waste facility has even been considered by the proponents of this project. Anything as critical as environmental impact would never occupy the thoughts of people who only wish to "do business" regardless of how it adversely affects thousands of people, animals, the air, water and soil of the area. Not a good idea now and not a good idea a hundred years from now.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 23, 2021 8:10 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: jecb64@yahoo.com <jecb64@yahoo.com>
Sent: Wednesday, December 22, 2021 4:35 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Janice Bickley

E-MAIL: jecb64@yahoo.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034744120

FAX:

COMMENTS: I vote no! Please don't allow this permit to destroy our community !! The filet, the traffic, the toxins, the carcinogens, the smell-this is not welcome in our neighborhood-especially from an outside county!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:24 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: windymeadowsfamilyfarm@gmail.com <windymeadowsfamilyfarm@gmail.com>
Sent: Friday, December 10, 2021 3:43 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Connie HALE

E-MAIL: windymeadowsfamilyfarm@gmail.com

COMPANY:

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034566017

FAX:

COMMENTS: We have a fine college that is helping to meet the needs of a large group of students, many comming from the Dallas and Rockwall on the I-30 corridor and have no other way to approach this university exept by HWY 24. There is already a large nummber of accidents that take place at the intersection of I-30 and HWY 24 that are being serviced by the Campbell Volenteer Fire Department. The greater amount of traffic generated by the large number of trucks also traveing along HWY 24 to reach this facilty is very concerning. These are busy, hardworking, unpaid volunteers that are

already handling close to 1000 calls for their neighborhood roads at the present time. We do not need a huge source of large dangerous trucks carrying potentially dangerous waste creating ongoing traffic for our citizens.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:23 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: windymeadowsfamilyfarm@gmail.com <windymeadowsfamilyfarm@gmail.com>
Sent: Friday, December 10, 2021 3:57 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Connie HALE

E-MAIL: windymeadowsfamilyfarm@gmail.com

COMPANY: Mike Hale

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034566017

FAX:

COMMENTS: I am one of several organic ranchers and gardeners in our neighborhood that serve our communtiy and surrounding towns with the best organic produce we can. This facilty, Level 5, means that it will accept any and all garbage that will threaten the very livelihood of our families. We drink the water from this aquafer and use it to water our gardens and feed our animals. We are very concerned for what this will do for our families and those to whom we supply.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:22 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: windymeadowsfamilyfarm@gmail.com <windymeadowsfamilyfarm@gmail.com>
Sent: Friday, December 10, 2021 4:08 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Connie HALE

E-MAIL: windymeadowsfamilyfarm@gmail.com

COMPANY: Mike Hale

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034566017

FAX:

COMMENTS: I know that dealing with garbage my be a necessary evil, but my understanding is that this facility will be accepting garbage from MANY surrounding counties and not even our own. I did not buy land to settle down into our fine neighborhood to live next to a dump station that cares not for the area in the neighborhood that they have bought land to do this project. My understanding of the facility is that they are not even wanting to spend the money for protecting this garbage in the day or two before it is actually processed and baled to move on somewhere else. I

understand the plans are for a "two sided building", with the mound of raw material to be "tarped", which sounds like some structure open on two ends that would attract some wildlife (vultures, coyotes--yes, we have plenty of both) that would carry off debris to the neighbors. Did I mention rats?? consider them said.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:21 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: windymeadowsfamilyfarm@gmail.com <windymeadowsfamilyfarm@gmail.com>
Sent: Friday, December 10, 2021 4:15 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Connie HALE

E-MAIL: windymeadowsfamilyfarm@gmail.com

COMPANY: Mike Hale

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034566017

FAX:

COMMENTS: My understanding is that the study done on for the facility did not do adequate research into the history of the area, remarking that there was no archeology of consequence or any evidence of ancient cultrues in the area where the facility is to be built. That statement is incorrect. There was archeology being studied by the the univerity in the area that included burial mounds that shuld have been included in the study that could be affected by this facility.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:20 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: s_wsp8@yahoo.com <s_wsp8@yahoo.com>
Sent: Friday, December 10, 2021 5:48 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Wendy M Speight

E-MAIL: s_wsp8@yahoo.com

COMPANY:

ADDRESS: PO BOX 779
COMMERCE TX 75429-0779

PHONE: 9034612510

FAX:

COMMENTS: I strongly disagree with this. I live directly behind Hunt County Sand. The dust from the pit is bad enough. I definitely do not want to be smelling waste.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:20 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: babbsrus69@gmail.com <babbsrus69@gmail.com>
Sent: Friday, December 10, 2021 10:38 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christopher James Babb

E-MAIL: babbsrus69@gmail.com

COMPANY:

ADDRESS: 2004 STATE HIGHWAY 24
CAMPBELL TX 75422-1315

PHONE: 9032747063

FAX:

COMMENTS: I would like to rise in opposition to the proposed waste transfer facility. Our community does not need this facility. There is a landfill that services our community and will for 33 years at present and with a new permit 100+ years. The stinch alone is reason enough for opposition. There are far more factors than just that however. This is a main thouroghfare through our community. There is not adequate infrastructure to support the number of trucks that will be leaving and entering the highway at this junction. This will create an unneccesary issue with traffic and potential

fatalities. This will negatively impact the community and the tax base. The proposed facility is two sided and does not have any air filtration. This community is supported by the college that is less than 4 miles away and has animal science buildings directly accross the highway and adjacent to the proposed site. This will negatively impact the perception of the college. We will be known as the Stnky school. This trash is not from our community. We have our community covered with an existing facility 2 miles away. We do not need or want this facility in our community.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:16 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: phdgroove@yahoo.com <phdgroove@yahoo.com>
Sent: Saturday, December 11, 2021 6:17 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Sean Dawson

E-MAIL: phdgroove@yahoo.com

COMPANY:

ADDRESS: 5808 COUNTY ROAD 4209
CAMPBELL TX 75422-1786

PHONE: 9032173087

FAX:

COMMENTS: We do not want this DUMP in our community. TYPE 5 means they will eventually be bringing hazardous materials that can lead to many many issues. Not to mention the added traffic to an already dangerous road with all the slow moving heavy trucks. At 200 per day which was one estimate, thats 20 trucks per hour in a 10 hour day. 100 trucks is 100 per hr and so on. Many walks of life travel these roads, from Highschool students, college students, mothers

taking their elementary school students to and from school, ranchers hauling livestock, to many daily commuters driving to and from work.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:15 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: phdgroove@yahoo.com <phdgroove@yahoo.com>
Sent: Saturday, December 11, 2021 6:23 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Sean Dawson

E-MAIL: phdgroove@yahoo.com

COMPANY:

ADDRESS: 5808 COUNTY ROAD 4209
CAMPBELL TX 75422-1786

PHONE: 9032173087

FAX:

COMMENTS: My family objects to this hazardous dump site being allowed to bring trash and other hazardous materials (TYPE 5) into our community from OUTSIDE Counties. Hunt Co. doesn't have a trash problem and doesn't need multiple counties trash issues winding up in its citizens backyard. This will pollute our wells, streams, and the very land we live on from the liquid run off and toxins being emitted into the air we breath. This will endanger the wellness of not only we the citizens but will also affect our livestock. Please do not grant this company a permit to destroy this community...

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:14 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: phdgroove@yahoo.com <phdgroove@yahoo.com>
Sent: Saturday, December 11, 2021 6:30 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Sean Dawson

E-MAIL: phdgroove@yahoo.com

COMPANY:

ADDRESS: 5808 COUNTY ROAD 4209
CAMPBELL TX 75422-1786

PHONE: 9032173087

FAX:

COMMENTS: It is understood that the permit requestor's only means of securing this facility is to put up two walls and a tarp the bio hard material. I am beyond skeptical as to the effectiveness of this plan. being a TYPE 5 waste site means they can bring ANYTHING in there. I also understand similar sites are fully enclosed and have state of the art filtration systems to help keep biohazard disasters to a minimal.Read that again... he plans to use TWO WALLS AND A TARP....

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:11 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: michele@lonestarsar.org <michele@lonestarsar.org>
Sent: Sunday, December 12, 2021 1:16 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Michele Benjamin

E-MAIL: michele@lonestarsar.org

COMPANY:

ADDRESS: 5861 COUNTY ROAD 4209
CAMPBELL TX 75422-1787

PHONE: 9727406499

FAX:

COMMENTS: I am against the plan to build a waste facility not far from our home and neighbors off a main road we travel every day (Hwy 24). This will be dangerous to our health because of the waste that will be transported to our area, affecting our ground water (we're on a well).. Also, the additional truck traffic will be greatly increased with the potential of more accidents. This facility should not be built here.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 9:10 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: karla@rosemound.net <karla@rosemound.net>
Sent: Sunday, December 12, 2021 8:49 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Karla Burke

E-MAIL: karla@rosemound.net

COMPANY:

ADDRESS: #177, 1414 CR 4216
Campbell TX 75422

PHONE: 9033662297

FAX:

COMMENTS: This transfer station will be be detrimental to our community.Traffic is heavy and at high speeds on HWY 24 Animals & people are killed daily. My own Grandmother was hit on this road returning to her home in the 1970's. Now there are more cars more people. School buses letting children off. College students driving to the University. Large garbage trucks turning off & on to this HWY only add more danger to those who need to be on this roadway. Please keep these trucks and the trash they bring, out of our home town and off our roads. Thank you, Karla Burke

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 3:30 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: brettharmon459@gmail.com <brettharmon459@gmail.com>
Sent: Monday, December 13, 2021 3:01 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Brett W Harmon

E-MAIL: brettharmon459@gmail.com

COMPANY:

ADDRESS: 5859 COUNTY ROAD 4209
CAMPBELL TX 75422-1787

PHONE: 9728147224

FAX:

COMMENTS: I am against this transfer station for a number of reasons. 1.I am on a well and am concerned about the possibility of water table contamination. 2.This will also have a negative impact on the wildlife. 3.Increased heavy truck traffic. A number of A&M agg facilities are either across the Hwy (24) or between the site location and Commerce where the College is located which will put our young students and faculty traveling Hwy 24 in much greater danger of accidents. 4.Decreased property values.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 3:30 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: susanlousberg@gmail.com <susanlousberg@gmail.com>
Sent: Monday, December 13, 2021 3:05 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Susan Lousberg

E-MAIL: susanlousberg@gmail.com

COMPANY:

ADDRESS: 414 COUNTY ROAD 4560
MT PLEASANT TX 75455-8551

PHONE: 9035720874

FAX:

COMMENTS: I hate to see this solid waste transfer station go in in this location. Why not put it in a more remote location? There are already crashes and some fatal, lots of traffic from school buses and college kids. I don't agree with this location at all.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, December 13, 2021 3:31 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: bunnyharmon@gmail.com <bunnyharmon@gmail.com>
Sent: Monday, December 13, 2021 2:51 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Bunny Harmon

E-MAIL: bunnyharmon@gmail.com

COMPANY:

ADDRESS: 5859 COUNTY ROAD 4209
CAMPBELL TX 75422-1787

PHONE: 2144024601

FAX:

COMMENTS: This transfer station should NOT be built in Hunt County. Many people, along with Texas A&M College Students drive this road, Hwy 24/50, daily, the additional truck traffic would add a danger to these young lives. The cattle, wildlife and people of all ages that live here and live off the land would be subject to toxic materials leached into the ground and released into the air by this filthy transfer station, causing severe illness and spreading disease. Please do not allow this transfer station to be built in our precious county.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 14, 2021 8:24 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: mjtrusty_attorney@msn.com <mjtrusty_attorney@msn.com>
Sent: Monday, December 13, 2021 5:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Mickey J Trusty

E-MAIL: mjtrusty_attorney@msn.com

COMPANY: The Trusty Law Firm

ADDRESS: PO BOX 1099 412 Pipeline Road
SULPHUR SPRINGS TX 75483-1099

PHONE: 2142441969

FAX:

COMMENTS: I am a 1972 graduate & the chairman of the Texas A&M University-Commerce in Commerce, Texas. You are proposing to put a solid waste plant at our University's Farm area, which is the DFW Metroplex gateway to our University and the City of Commerce on the main four-lane highway going through the area? This is the one thing that could destroy the city and the 3rd largest university in the Texas A&M System. No, No, No. Do you understand that our

University is the 2nd largest economic engine for this part of Northeast Texas and can easily become the largest in this area in the coming years? I will be contacting my state representative and senator tomorrow.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, December 14, 2021 8:21 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: sford03@gmail.com <sford03@gmail.com>
Sent: Tuesday, December 14, 2021 8:10 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Steven Ford

E-MAIL: sford03@gmail.com

COMPANY:

ADDRESS: 3505 FM 499
GREENVILLE TX 75401-6038

PHONE: 8107305534

FAX:

COMMENTS: I don't believe this trash transfer station is right for this area. There is a wildlife refuge nearby, a large agricultural community, and the area is growing fast. This will endanger our natural resources, some of which local residents depend on. This will also lower property valued and the overall desirability of the area.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 9:01 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Amanda.l.adams@gmail.com <Amanda.l.adams@gmail.com>
Sent: Wednesday, December 15, 2021 9:57 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Amanda Adams

E-MAIL: Amanda.l.adams@gmail.com

COMPANY:

ADDRESS: 5645 E INTERSTATE 30
CAMPBELL TX 75422-2747

PHONE: 9034221344

FAX:

COMMENTS: This will be an eyesore to the community as proposed. It is on a busy highway, just a few miles from a university and grade schools. My property value will decrease and it will discourage the growth in the area. The current plan does nothing to address any benefits for the community.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 9:01 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Jk@desertwesttech.com <Jk@desertwesttech.com>
Sent: Thursday, December 16, 2021 1:04 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR John Kirkpatrick, III

E-MAIL: Jk@desertwesttech.com

COMPANY:

ADDRESS: 2066 FM 3218
CAMPBELL TX 75422-2272

PHONE: 9728965203

FAX:

COMMENTS: I am against Having a Type V Transfer Station in Campbell Tx. The Location is very bad. I am concerned with the type of trash that will be accepted. I am concerned with the flow of contaminates into my water supply. Please do not let this facility get the TYPE V Permit.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 9:00 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jecb64@yahoo.com <jecb64@yahoo.com>
Sent: Thursday, December 16, 2021 7:57 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Janice Bickley

E-MAIL: jecb64@yahoo.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034744120

FAX:

COMMENTS: I'm writing in concern of the proposed waste transfer station they are trying to put in our neighborhood! This will bring only negative to us that live here. The traffic effects alone will be devastating and bring so much more traffic to an already busy road, and create a situation that will cause accidents & death. The negative that this will cause to the ecosystem is a huge issue as well, there is no way there will not be run off that will seep into the soil which will affect our gardens-livestock-pets. And the smell that come with this station will affect a huge area as well & all of these

issues will not only be a nuisance, but will decrease our quality of life we are used to & decrease our land value. Please do NOT approve this permit.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 9:52 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: bixlucky@gmail.com <bixlucky@gmail.com>
Sent: Thursday, December 16, 2021 9:47 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dave Bickley

E-MAIL: bixlucky@gmail.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034131172

FAX:

COMMENTS: This facility will lead to an increase of large truck traffic on an already dangerous stretch of road. I've lived in this community most of my life and have driven this same road back and forth to work for 35 years. The past 5-6 years there has been a tremendous increase in traffic on this road and subsequently an increase in accidents, many of them fatal accidents. I personally know of families leaving this area becasue of this dangerous road, and I ask our sons and daughters and their spouses to avoid it when they come to visit because there are so many bad accidents through there.

A facility like this will only increase the risk of these types of accidents. There are several satellite campuses of Texas A&M-Commerce adjacent to, or within a few hundred feet of this proposed location, so there are a lot of young drivers entering and exiting the road. Large trucks going through here at highway speeds could lead to more car crashes and loss of lives

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 10:08 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Geauxducks79@gmail.com <Geauxducks79@gmail.com>
Sent: Thursday, December 16, 2021 10:03 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Dustin McNeese

E-MAIL: Geauxducks79@gmail.com

COMPANY:

ADDRESS: 4200 TEMPLETON ST
GREENVILLE TX 75401-4918

PHONE: 2146743329

FAX:

COMMENTS: As a commuting member of this area, I have grave concerns about the environmental and safety implications of the proposed business going in this area. HWY24 is already dangerous road with a propensity for accidents and I believe this will exacerbate that. I also have concerns with the environmental and odorous impact that this will have on all of the residents/commuters in the area. In short, I vehemently oppose this measure and do not believe this is good for the residents of Hunt County in any way, shape or form.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 1:37 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: brbeane50@gmail.com <brbeane50@gmail.com>
Sent: Thursday, December 16, 2021 11:03 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Billy Rhea Beane

E-MAIL: brbeane50@gmail.com

COMPANY:

ADDRESS: 2635 COUNTY ROAD 4312
CAMPBELL TX 75422-2201

PHONE: 9033550522

FAX:

COMMENTS: I am totally against approval of this permit. I don't want other counties dangerous waste. We have extreme health and environmental concerns. We already have traffic concerns with the existing traffic from the nearby facility and the sand pits. We have had fatal wrecks. The university is working to improve this area and we don't want additional trucks from both directions in front of the crosswalk for the students. If approved, we must have an enclosed facility and additional lanes for safety and to keep birds and wild hogs from spreading disease.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 1:35 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: brbeane50@gmail.com <brbeane50@gmail.com>
Sent: Thursday, December 16, 2021 1:05 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Billy Rhea Beane

E-MAIL: brbeane50@gmail.com

COMPANY:

ADDRESS: 2635 COUNTY ROAD 4312
CAMPBELL TX 75422-2201

PHONE: 9033550522

FAX:

COMMENTS: I am totally against approval of this permit. I don't want other counties dangerous waste. We have extreme health and environmental concerns. We already have traffic concerns with the existing traffic from the nearby facility and the sand pits. We have had fatal wrecks. The university is working to improve this area and we don't want additional trucks from both directions in front of the crosswalk for the students. If approved, we must have an enclosed facility and additional lanes for safety and to keep birds and wild hogs from spreading disease.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, December 16, 2021 1:40 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: tedcrim1947@gmail.com <tedcrim1947@gmail.com>
Sent: Thursday, December 16, 2021 1:05 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Ted Ray Crim

E-MAIL: tedcrim1947@gmail.com

COMPANY:

ADDRESS: 2313 NEWCASTLE CIR
PLANO TX 75075-3328

PHONE: 9729641546

FAX:

COMMENTS: I wish to express strong opposition to the proposed solid waste facility on Highway 24, Campbell, Texas. The proposed facility is adjacent to the University Farm of Texas A&M University-Commerce where animal research and farming operations are conducted daily. The proposed solid waste facility is also very near Texas A&M University-Commerce (TAMU-C) itself on the same highway. This proposal, if approved, will degrade the broader environmental quality of several communities, small towns and cities in the general area. Environmental concerns for this proposed

facility appear none existent and would have adverse consequences to air quality, water table, the bucolic scenes of daily rural Texas that would be greatly compromised in myriad ways. The solid waste facility, as planned, would diminish the pastoral scenes that are currently undisturbed and would transform the previously serene and beautiful landscape that has been undiminished for centuries. Approval for this dreadful project would immediately degrade and devalue property values including the State owned University Farm of Texas A&M University-Commerce in perpetuity. Texas A&M University-Commerce itself would suffer the same adverse consequences if this proposal is approved that the extended surrounding area is destined to experience forever. This a merely a business proposal for a waste treatment/disposal operation that can easily redirect its efforts to construct a solid waste facility at another not so consequential location. The company will continue operations and has little or no concern for the perpetual adverse impact such a facility will have on the immediate and extended area. Highway 24 is the historical principal access to Texas A&M University-Commerce where noted dignitaries, U.S. Presidents', political leaders', authors, military leaders' and other notables often travel to the TAMUC campus using Highway 24 where the previously pristine appearance of the rural landscape would be replaced with an unsightly waste facility where trash and other refuse would be dispersed daily, not to mention the odors and debris that would emanate from such a destructive facility that virtually all campus visitor's including parents' of potential students, faculty and staff would have to pass in order to reach the nearby TAMUC campus. The cost to the University and surrounding area would be incalculable. Property values would plummet, trash and other waste material would fall off of the legions of trucks that would constantly be entering and leaving the solid waste facility and that would only be the beginning. Any facility of this kind will inevitably expand and disperse its unsavory influence over an even broader area. And all of this could easily be prevented by simply relocating the facility in a much less populated area that would not constitute a complete degradation of living conditions as the current proposal does. The company responsible for this highly undesirable project will survive and flourish regardless of where it is located. The proposed location presents multiple and compelling reasons why this facility cannot and should not be approved and I respectfully submit that the proposal to construct a solid waste facility in Campbell, Texas be declined. One additional point. It is unlikely that the owner of the company seeking approval for this proposed facility would appreciate it if another waste treatment company decided to construct such a facility virtually next door to his place of residence. The same reasoning applies to the many families who reside in the small communities, towns and cities near the proposed waste site. As indicated, this company will flourish wherever they construct the solid waste facility. The proposed site is immediately next to the Texas A&M University-Commerce farm and is very near the University itself. If such a facility was being proposed near the Texas A&M University campus, wonder how far that proposal would go. I rest my case.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 17, 2021 7:55 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jimandnellb@gmail.com <jimandnellb@gmail.com>
Sent: Thursday, December 16, 2021 6:28 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: James Brown

E-MAIL: jimandnellb@gmail.com

COMPANY:

ADDRESS: 2585 COUNTY ROAD 4312
CAMPBELL TX 75422-2308

PHONE: 9038867439

FAX:

COMMENTS: I live just down the road from the proposed transfer station. I have serious concerns about air quality, waste water runnoff, loose trash, and the amount of truck traffic. It appears there have not been any provisions for turn lanes or access/egress safety. Additionally a two sided building is not adequate for proper control of the garbage. If we must be forced to accept this outrageous operation it should at least be built to the best known techonology. HIghway 24/50 is a major north/south roadway and should not be the location of a trash facility. Such an operation downgrades

the whole community which includes a major university. Obviously someone tried to sneak this in without local input which furthur points toward an underhanded operation that can't be trusted to run a business safely.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 8:43 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: drcynross@gmail.com <drcynross@gmail.com>
Sent: Monday, November 15, 2021 2:38 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Cynthia Ross

E-MAIL: drcynross@gmail.com

COMPANY:

ADDRESS: 2625 STERLING HART DR
COMMERCE TX 75428-3921

PHONE: 5093395342

FAX:

COMMENTS: As a resident of Commerce, a mother of a small child, and a university faculty member I strongly oppose this permit. This transfer station will negatively impact our community, our university, and create a host of potential health hazards for our citizens.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 8:40 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: raybert75428@yahoo.com <raybert75428@yahoo.com>
Sent: Monday, November 15, 2021 4:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Raymond Green

E-MAIL: raybert75428@yahoo.com

COMPANY:

ADDRESS: 3775 WILDWOOD DR
CAMPBELL TX 75422-1843

PHONE: 9033669438

FAX:

COMMENTS: The proposed site is very close to my house (my property runs into Hwy24). And although I don't want a solid waste site near my house due to odor and appearance, my greatest concern is safety. Having close to 70 garbage trucks turning on and off the highway is a risk to my wife who drives that road to and from work each day and my teenage children who now drive. Additionally, having the site in between Texas A&M University-Commerce properties

will have a deleterious effect on the campus, driving down enrollment. As the university is the economic driver of the area, we can't have this happen.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 8:37 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Saucer03@yahoo.com <Saucer03@yahoo.com>
Sent: Monday, November 15, 2021 7:59 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Tim Schauer

E-MAIL: Saucer03@yahoo.com

COMPANY:

ADDRESS: 225 PROVIDENCE DR
VAN ALSTYNE TX 75495-2862

PHONE: 9033669555

FAX:

COMMENTS: As an alumni of A&M Commerce, I have deep concerns with the installation of this facility in tue city of Commerce. Having lived near one if these facilities before, I understand the issues that come with a facility of this nature. Please do not grant this permit and help protect the beauty of Commerce, TX and the campus of A&M Commerce.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:30 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: aden.boyer@tamuc.edu <aden.boyer@tamuc.edu>
Sent: Monday, November 15, 2021 2:08 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: TX

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Aden Boyer

E-MAIL: aden.boyer@tamuc.edu

COMPANY: TAMU-COMMERCE

ADDRESS: 1490 WINDING LN
GREENVILLE TX 75402-9134

PHONE: 9034686068

FAX:

COMMENTS: I would like to voice my concern for the proposed solid waste facility near the Texas A&M Commerce Agricultural research center and barns. The creation of this facility near this site would disrupt vital research and learning conducted by students and faculty at this site. Additionally, this would negatively impact A&M Commerce's ability to recruit and retain qualified faculty, staff, and students by creating a negative and disruptive environment that

is not conducive to instruction or research. I would like to ask that This permit be denied for this site or for any future site that would negatively impact any center for learning.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:30 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: gossettjessica.jg@gmail.com <gossettjessica.jg@gmail.com>
Sent: Monday, November 15, 2021 2:13 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jessica N Gossett

E-MAIL: gossettjessica.jg@gmail.com

COMPANY:

ADDRESS: 4071 FM 1568
CAMPBELL TX 75422-2257

PHONE: 9032179969

FAX:

COMMENTS: This is absolutely the worst location you could possible put this. You are going to kill real estate prices near this property and the surrounding areas. Not to mention the environmental aspect it will have on those that live close by.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:25 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411
Attachments: TAMU-Commerce Presidents Comment Letter with Depictions (TCEQ Permit 2411).PDF

PM

From: Travis.Ball@tamuc.edu <Travis.Ball@tamuc.edu>
Sent: Monday, November 15, 2021 11:29 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Travis Ball

E-MAIL: Travis.Ball@tamuc.edu

COMPANY: Texas A&M University-Commerce

ADDRESS: PO BOX 3011
COMMERCE TX 75429-3011

PHONE: 9038865060

FAX:

COMMENTS: A&M-Commerce joins many other concerned members of the local community in opposition to the permit application of Transfer Station Solutions, LLC for a solid waste facility. The proposed station would be located directly across Highway 24 from the university's agricultural learning and research facilities, negatively impacting both. See attached letter.

Since 1889

November 11, 2021

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78735

Ms. Laurie Gharis
Chief Clerk
Office of Chief Clerk, MC 105
TCEQ
P.O. Box 13087
Austin, TX 78711-3087

Re: Application of Transfer Station Solutions, LLC for Municipal Solid Waste Facility Permit

Dear Deputy Director Fritz and Chief Clerk Gharis:

Texas A&M University–Commerce (University), joins the many other concerned members of the Commerce community in opposition to the application of Transfer Station Solutions, LLC (Applicant) for a municipal solid waste facility under Permit No. 2411. The proposed transfer station will be situated directly across State Highway 24 from certain University teaching and research classrooms and facilities and is unsuitable for an educational environment (See depictions attached). In addition, the University requests more information on the Applicant's plan for the transportation of the transferred waste from the proposed transfer station. The University is concerned that such transferred waste will be taken by tractor trailers from the proposed station north along State Highway 24 running directly adjacent to the main campus of the University in Commerce to the final waste disposal site, exacerbating the negative effects on the University. The University is in the process of assessing the overall impact that this facility would have to its campus community and will submit a more formal response detailing our apprehensions, and we wanted to register our complete concern over this proposed facility.

We are certain that allowing this project to proceed will result in at least the following issues:

1. Odors and noise that will impact the University's students, veterinary instruction facility, agricultural facility, animal facilities, and research projects;
2. Increased traffic directly across from the entrance to University facilities that will endanger those accessing these University facilities;
3. Visual impacts from the University, including from the upper levels of its campus buildings;

4. Negative impacts to the University's ability to recruit faculty and students and to promote its educational opportunities due to odors, visual impacts, noise and presence of stray trash;
5. Negative impacts on the University's to-be-constructed Agricultural Expo Facility to be located on the University's property approximately 2.4 miles north of this proposed site on State Highway 24 (See depiction attached); and
6. Potential impacts to the local water table and harm to the many local water wells.

The University has worked hard and invested significantly to create a special learning and research environment that is attractive to students, faculty and alumni alike. This environment, which is critical to a successful campus and contributes to the entire Commerce community, is directly threatened by the odors, noise, traffic and environmental impact of a solid waste facility in such close proximity. The University requests that it be considered a stakeholder in all considerations of this application given the University's property is within 300 feet of the entrance to the proposed facility. We request that a public meeting be scheduled so that students, staff and faculty may have an opportunity to provide you with their thoughts on the impact a municipal solid waste facility will have on the campus.

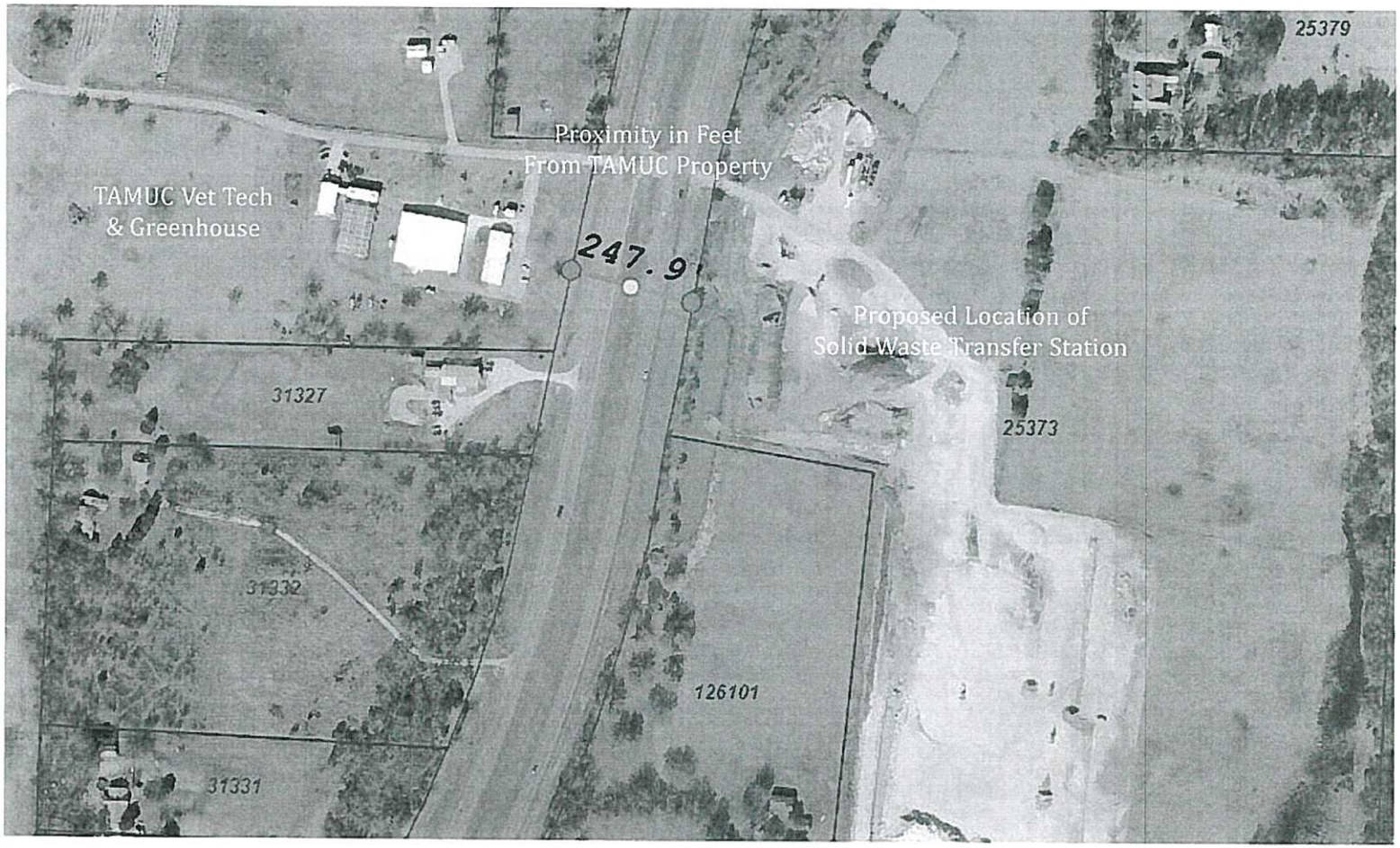
Thank you for your consideration of this important matter. Our contact for this matter will be Mr. Travis Ball, Texas A&M University-Commerce, at (903) 886-5060 or Travis.Ball@tamuc.edu.

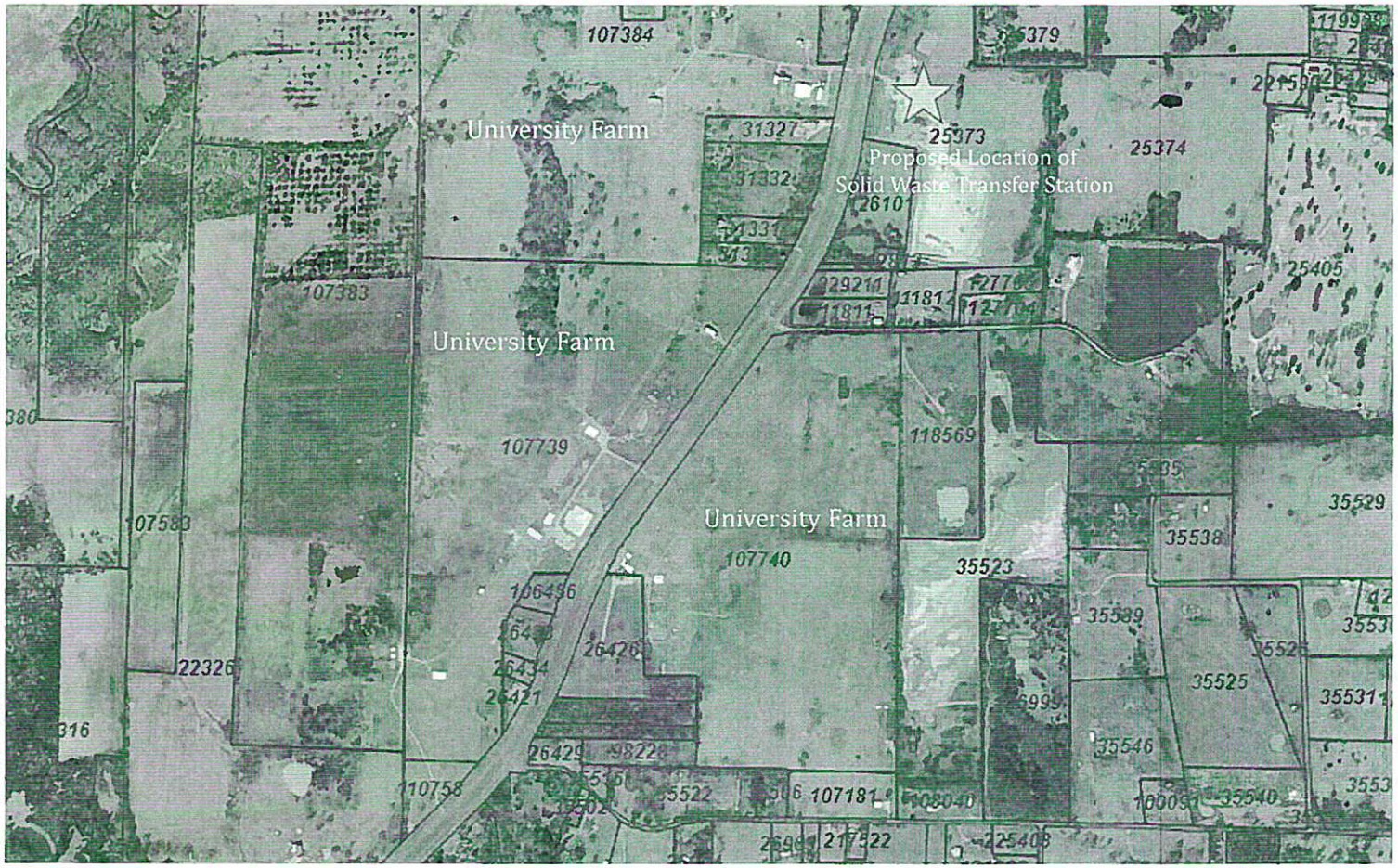
Sincerely,

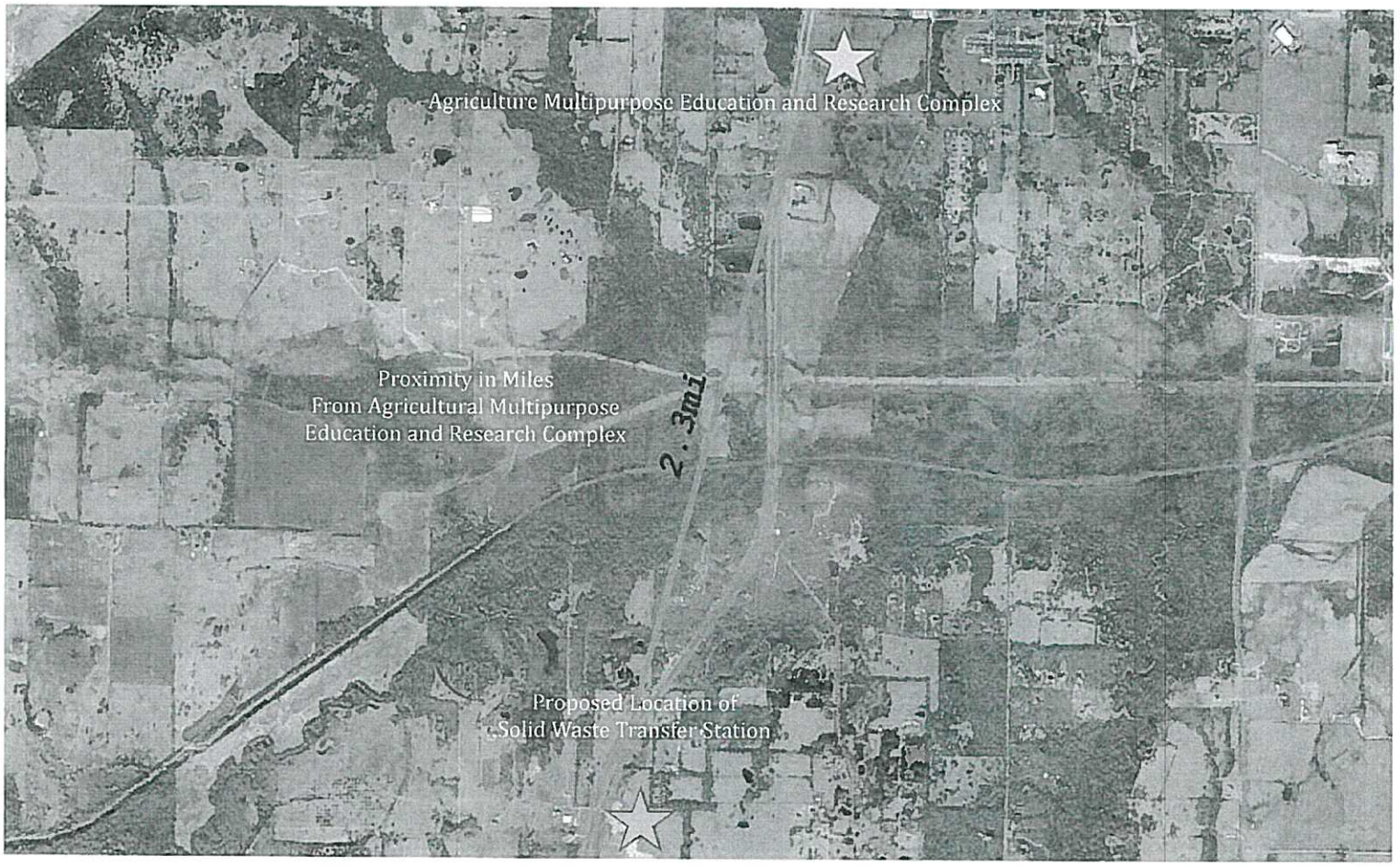
Mark Rudin
President

Attachments

c: Office of General Counsel, The Texas A&M University System


25379
Proximity in Feet
From TAMUC Property
TAMUC Vet Tech
& Greenhouse
247.9
Proposed Location of
Solid Waste Transfer Station
31327
25373
31332
126101
31331


University Farm
University Farm
University Farm
Proposed Location of
Solid Waste Transfer Station
107384
25373
25374
25405
31327
31332
26101
107383
107739
118569
107740
35523
35529
35538
35589
35525
35531
35546
35540
107181
22326
26426
26421
26429
107583
110758


Agriculture Multipurpose Education and Research Complex
Proximity in Miles
From Agricultural Multipurpose
Education and Research Complex
2.3mi
Proposed Location of
Solid Waste Transfer Station

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 1:02 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: CORRECTION: Public comment on Permit Number 2411
Attachments: TAMU-Commerce Presidents Comment Letter with Depictions (TCEQ Permit 2411).PDF

eComment = comment
Attachment = PM

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:24 PM
To: PUBCOMMENT-OCC2 <pubcomment-occ2@tceq.texas.gov>; PUBCOMMENT-OPIC <pubcomment-opic@tceq.texas.gov>; PUBCOMMENT-ELD <pubcomment-eld@tceq.texas.gov>; PUBCOMMENT-WPD <pubcomment-wpd@tceq.texas.gov>
Subject: FW: Public comment on Permit Number 2411

PM

From: Travis.Ball@tamuc.edu <Travis.Ball@tamuc.edu>
Sent: Monday, November 15, 2021 11:29 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Travis Ball

E-MAIL: Travis.Ball@tamuc.edu

COMPANY: Texas A&M University-Commerce

ADDRESS: PO BOX 3011
COMMERCE TX 75429-3011

PHONE: 9038865060

FAX:

COMMENTS: A&M-Commerce joins many other concerned members of the local community in opposition to the permit application of Transfer Station Solutions, LLC for a solid waste facility. The proposed station would be located directly across Highway 24 from the university's agricultural learning and research facilities, negatively impacting both. See attached letter.

Since 1889

November 11, 2021

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78735

Ms. Laurie Gharis
Chief Clerk
Office of Chief Clerk, MC 105
TCEQ
P.O. Box 13087
Austin, TX 78711-3087

Re: Application of Transfer Station Solutions, LLC for Municipal Solid Waste Facility Permit

Dear Deputy Director Fritz and Chief Clerk Gharis:

Texas A&M University–Commerce (University), joins the many other concerned members of the Commerce community in opposition to the application of Transfer Station Solutions, LLC (Applicant) for a municipal solid waste facility under Permit No. 2411. The proposed transfer station will be situated directly across State Highway 24 from certain University teaching and research classrooms and facilities and is unsuitable for an educational environment (See depictions attached). In addition, the University requests more information on the Applicant's plan for the transportation of the transferred waste from the proposed transfer station. The University is concerned that such transferred waste will be taken by tractor trailers from the proposed station north along State Highway 24 running directly adjacent to the main campus of the University in Commerce to the final waste disposal site, exacerbating the negative effects on the University. The University is in the process of assessing the overall impact that this facility would have to its campus community and will submit a more formal response detailing our apprehensions, and we wanted to register our complete concern over this proposed facility.

We are certain that allowing this project to proceed will result in at least the following issues:

1. Odors and noise that will impact the University's students, veterinary instruction facility, agricultural facility, animal facilities, and research projects;
2. Increased traffic directly across from the entrance to University facilities that will endanger those accessing these University facilities;
3. Visual impacts from the University, including from the upper levels of its campus buildings;

4. Negative impacts to the University's ability to recruit faculty and students and to promote its educational opportunities due to odors, visual impacts, noise and presence of stray trash;
5. Negative impacts on the University's to-be-constructed Agricultural Expo Facility to be located on the University's property approximately 2.4 miles north of this proposed site on State Highway 24 (See depiction attached); and
6. Potential impacts to the local water table and harm to the many local water wells.

The University has worked hard and invested significantly to create a special learning and research environment that is attractive to students, faculty and alumni alike. This environment, which is critical to a successful campus and contributes to the entire Commerce community, is directly threatened by the odors, noise, traffic and environmental impact of a solid waste facility in such close proximity. The University requests that it be considered a stakeholder in all considerations of this application given the University's property is within 300 feet of the entrance to the proposed facility. We request that a public meeting be scheduled so that students, staff and faculty may have an opportunity to provide you with their thoughts on the impact a municipal solid waste facility will have on the campus.

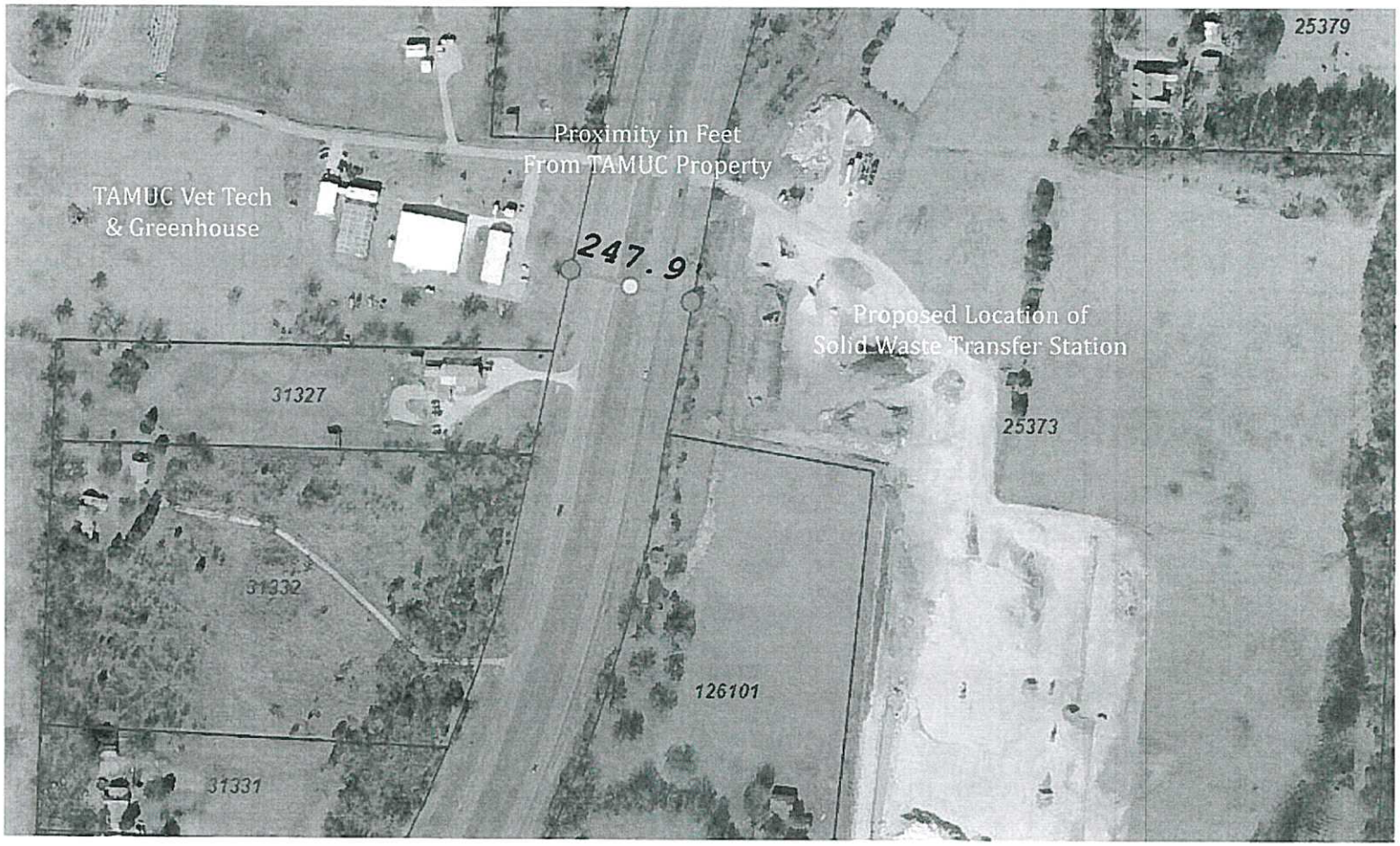
Thank you for your consideration of this important matter. Our contact for this matter will be Mr. Travis Ball, Texas A&M University-Commerce, at (903) 886-5060 or Travis.Ball@tamuc.edu.

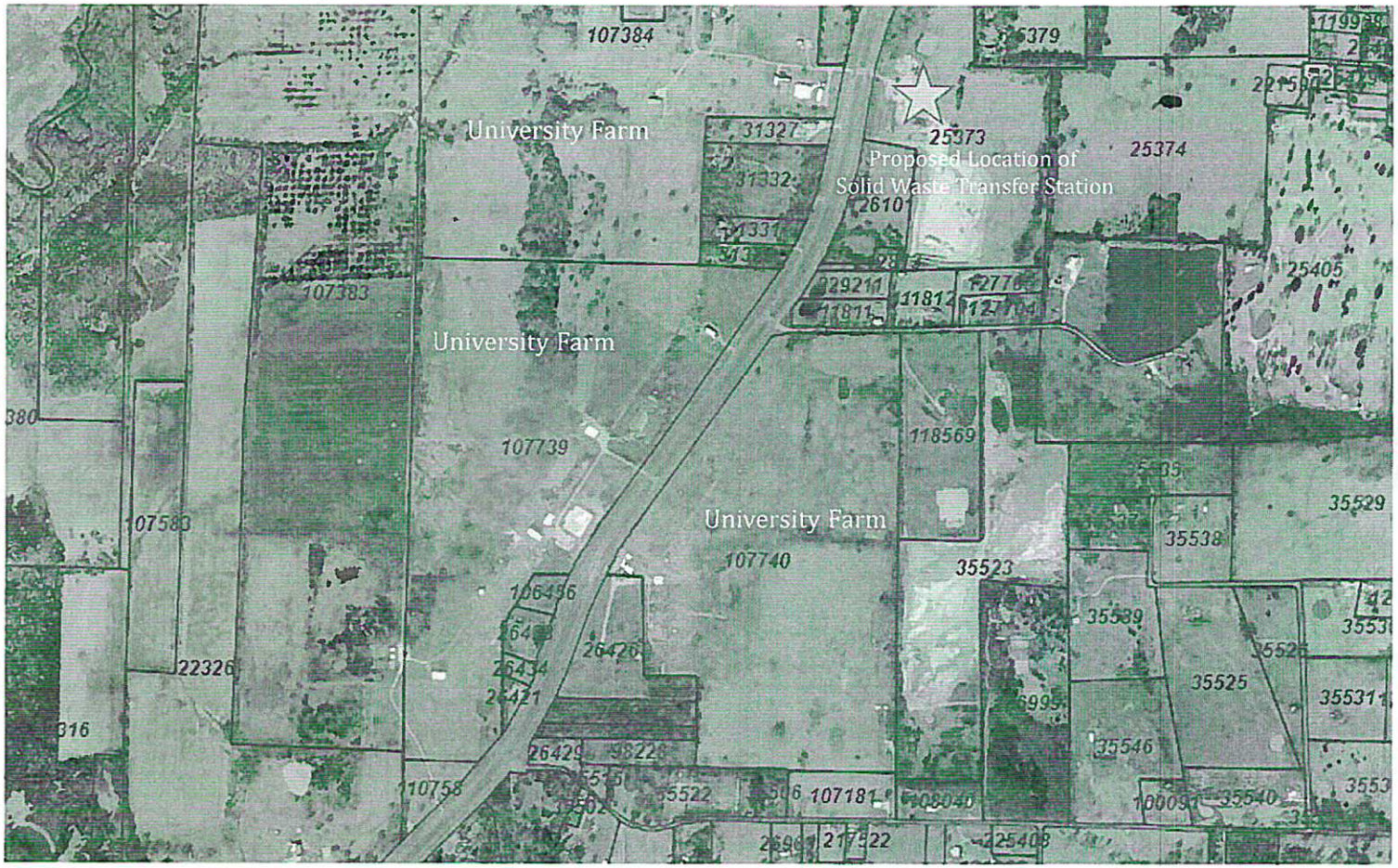
Sincerely,

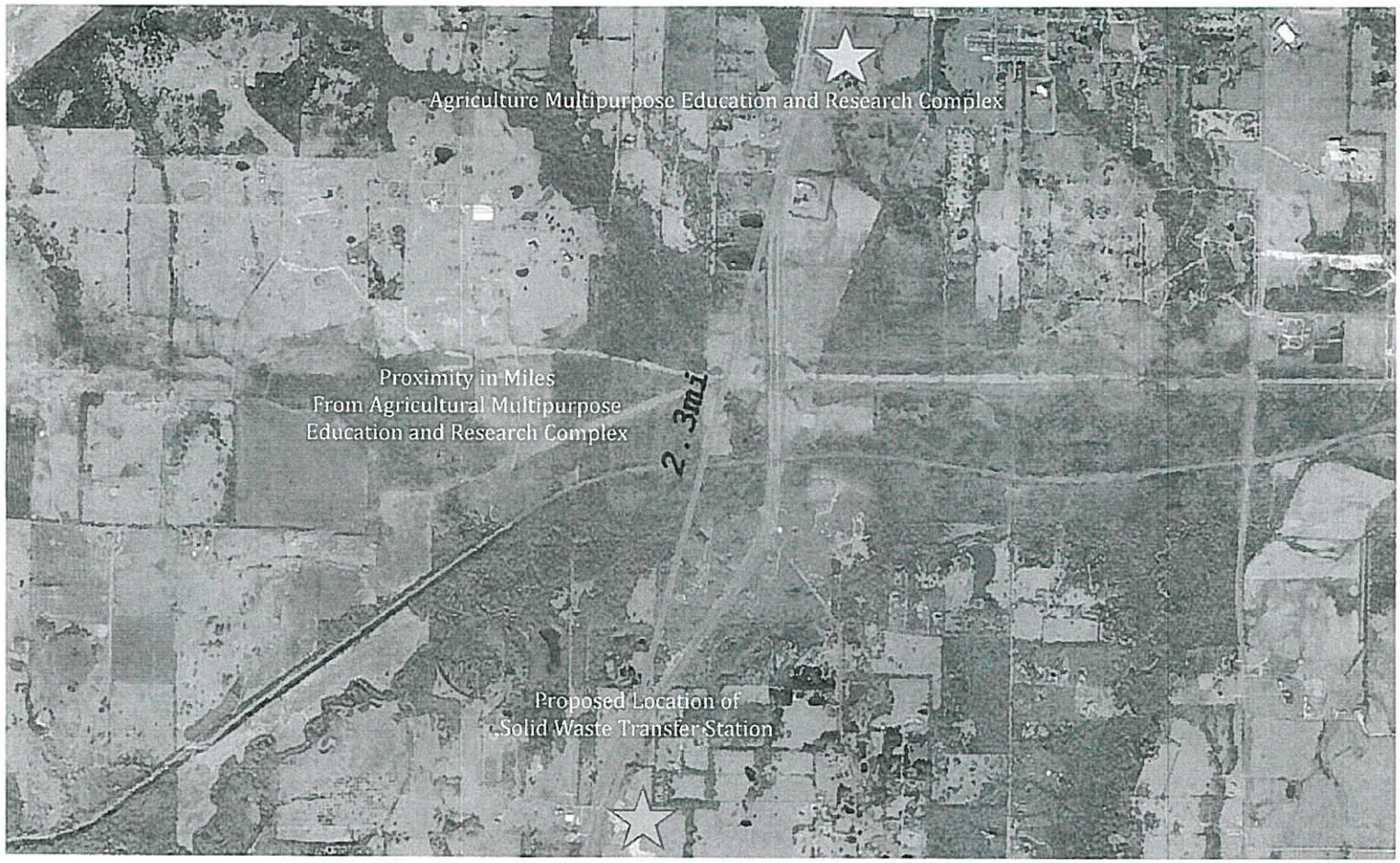
Mark Rudin
President

Attachments

c: Office of General Counsel, The Texas A&M University System


25379
Proximity in Feet
From TAMUC Property
TAMUC Vet Tech
& Greenhouse
247.9
Proposed Location of
Solid Waste Transfer Station
31327
25373
31332
126101
31331


University Farm
University Farm
University Farm
Proposed Location of
Solid Waste Transfer Station
107384
25373
25374
25405
31327
31332
26101
107383
107739
118569
107740
35523
35529
35538
35525
35546
35540
22326
107583
107181
107758
26426
26429
26434
26421
35522
217522
225408


Agriculture Multipurpose Education and Research Complex
Proximity in Miles
From Agricultural Multipurpose
Education and Research Complex
2.3mi
Proposed Location of
Solid Waste Transfer Station

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 1:01 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: CORRECTION: Public comment on Permit Number 2411
Attachments: TAMU-Commerce Presidents Comment Letter with Depictions (TCEQ Permit 2411).PDF

eComment = comment
attachment = PM

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:29 PM
To: PUBCOMMENT-OCC2 <pubcomment-occ2@tceq.texas.gov>; PUBCOMMENT-OPIC <pubcomment-opic@tceq.texas.gov>; PUBCOMMENT-ELD <pubcomment-eld@tceq.texas.gov>; PUBCOMMENT-WPD <pubcomment-wpd@tceq.texas.gov>
Subject: FW: Public comment on Permit Number 2411

PM

From: Amanda.Scott@tamuc.edu <Amanda.Scott@tamuc.edu>
Sent: Monday, November 15, 2021 2:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Amanda Scott

E-MAIL: Amanda.Scott@tamuc.edu

COMPANY: Texas A&M University - Commerce

ADDRESS: 204 BROOKHAVEN TER
COMMERCE TX 75428-2002

PHONE: 4696620031

FAX:

COMMENTS: Since we have such high ground water levels, and lack of popper drainage I am most concerned about water run off with the trash liquids. There could be major environmental impacts to the farm life in the area and the natural wildlife. We are certain that allowing this project to proceed will result in at least the following issues: Odors and noise that will impact the University's students, veterinary instruction facility, agricultural facility, animal facilities, and research projects; Increased traffic directly across from the entrance to University facilities that will endanger those accessing these University facilities; Visual impacts from the University, including from the upper levels of its campus buildings;

Since 1889

November 11, 2021

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78735

Ms. Laurie Gharis
Chief Clerk
Office of Chief Clerk, MC 105
TCEQ
P.O. Box 13087
Austin, TX 78711-3087

Re: Application of Transfer Station Solutions, LLC for Municipal Solid Waste Facility Permit

Dear Deputy Director Fritz and Chief Clerk Gharis:

Texas A&M University–Commerce (University), joins the many other concerned members of the Commerce community in opposition to the application of Transfer Station Solutions, LLC (Applicant) for a municipal solid waste facility under Permit No. 2411. The proposed transfer station will be situated directly across State Highway 24 from certain University teaching and research classrooms and facilities and is unsuitable for an educational environment (See depictions attached). In addition, the University requests more information on the Applicant's plan for the transportation of the transferred waste from the proposed transfer station. The University is concerned that such transferred waste will be taken by tractor trailers from the proposed station north along State Highway 24 running directly adjacent to the main campus of the University in Commerce to the final waste disposal site, exacerbating the negative effects on the University. The University is in the process of assessing the overall impact that this facility would have to its campus community and will submit a more formal response detailing our apprehensions, and we wanted to register our complete concern over this proposed facility.

We are certain that allowing this project to proceed will result in at least the following issues:

1. Odors and noise that will impact the University's students, veterinary instruction facility, agricultural facility, animal facilities, and research projects;
2. Increased traffic directly across from the entrance to University facilities that will endanger those accessing these University facilities;
3. Visual impacts from the University, including from the upper levels of its campus buildings;

4. Negative impacts to the University's ability to recruit faculty and students and to promote its educational opportunities due to odors, visual impacts, noise and presence of stray trash;
5. Negative impacts on the University's to-be-constructed Agricultural Expo Facility to be located on the University's property approximately 2.4 miles north of this proposed site on State Highway 24 (See depiction attached); and
6. Potential impacts to the local water table and harm to the many local water wells.

The University has worked hard and invested significantly to create a special learning and research environment that is attractive to students, faculty and alumni alike. This environment, which is critical to a successful campus and contributes to the entire Commerce community, is directly threatened by the odors, noise, traffic and environmental impact of a solid waste facility in such close proximity. The University requests that it be considered a stakeholder in all considerations of this application given the University's property is within 300 feet of the entrance to the proposed facility. We request that a public meeting be scheduled so that students, staff and faculty may have an opportunity to provide you with their thoughts on the impact a municipal solid waste facility will have on the campus.

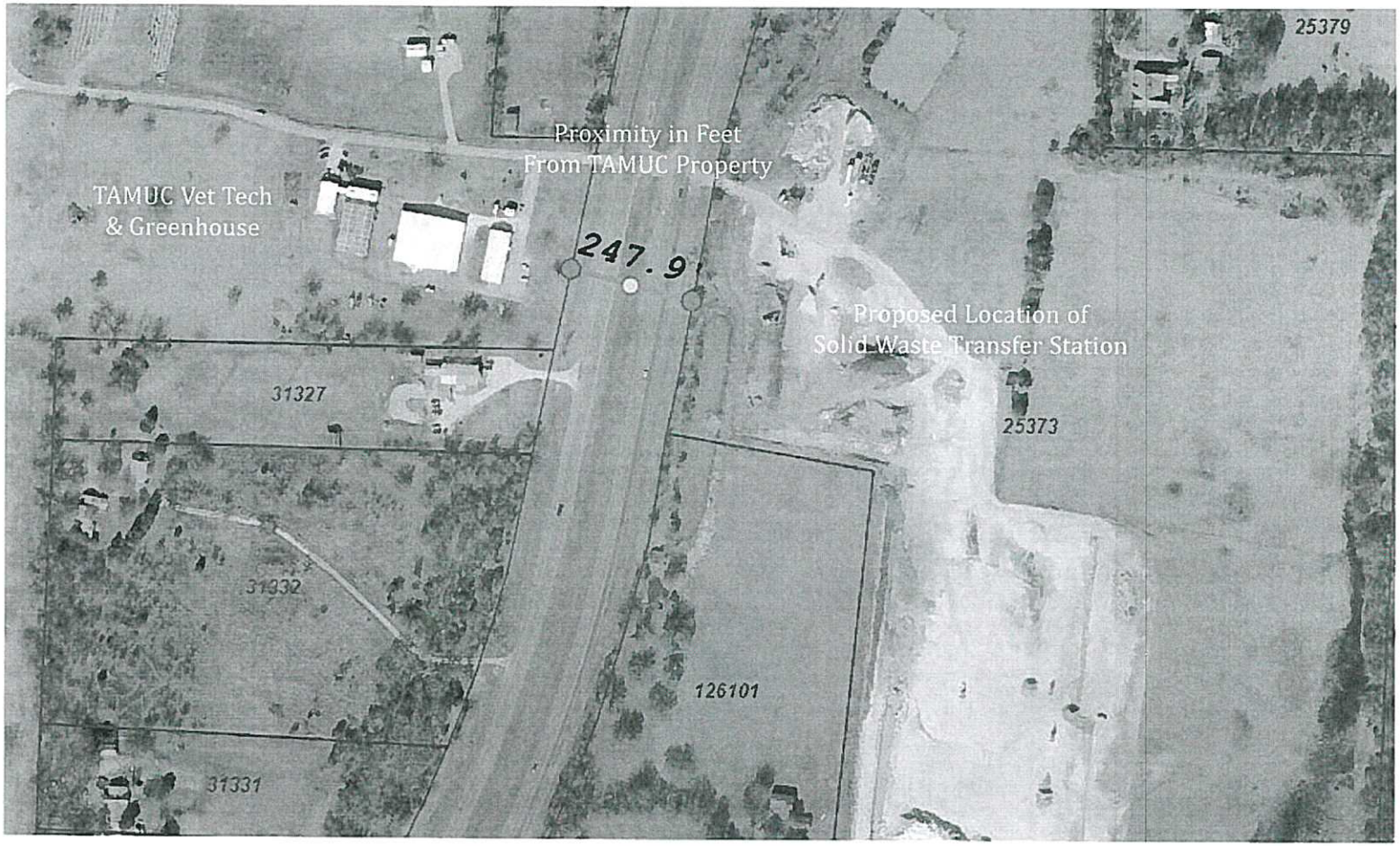
Thank you for your consideration of this important matter. Our contact for this matter will be Mr. Travis Ball, Texas A&M University-Commerce, at (903) 886-5060 or Travis.Ball@tamuc.edu.

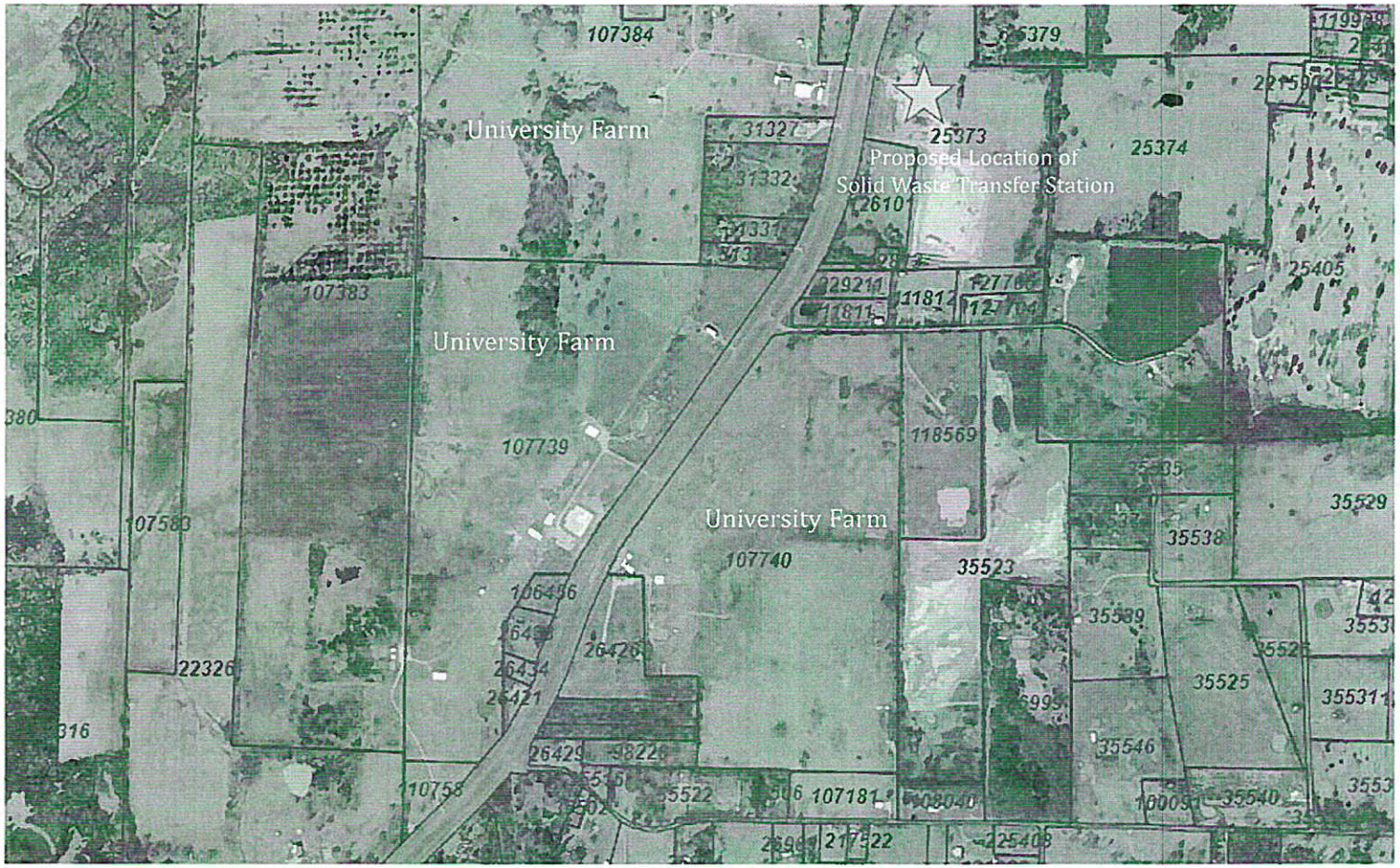
Sincerely,

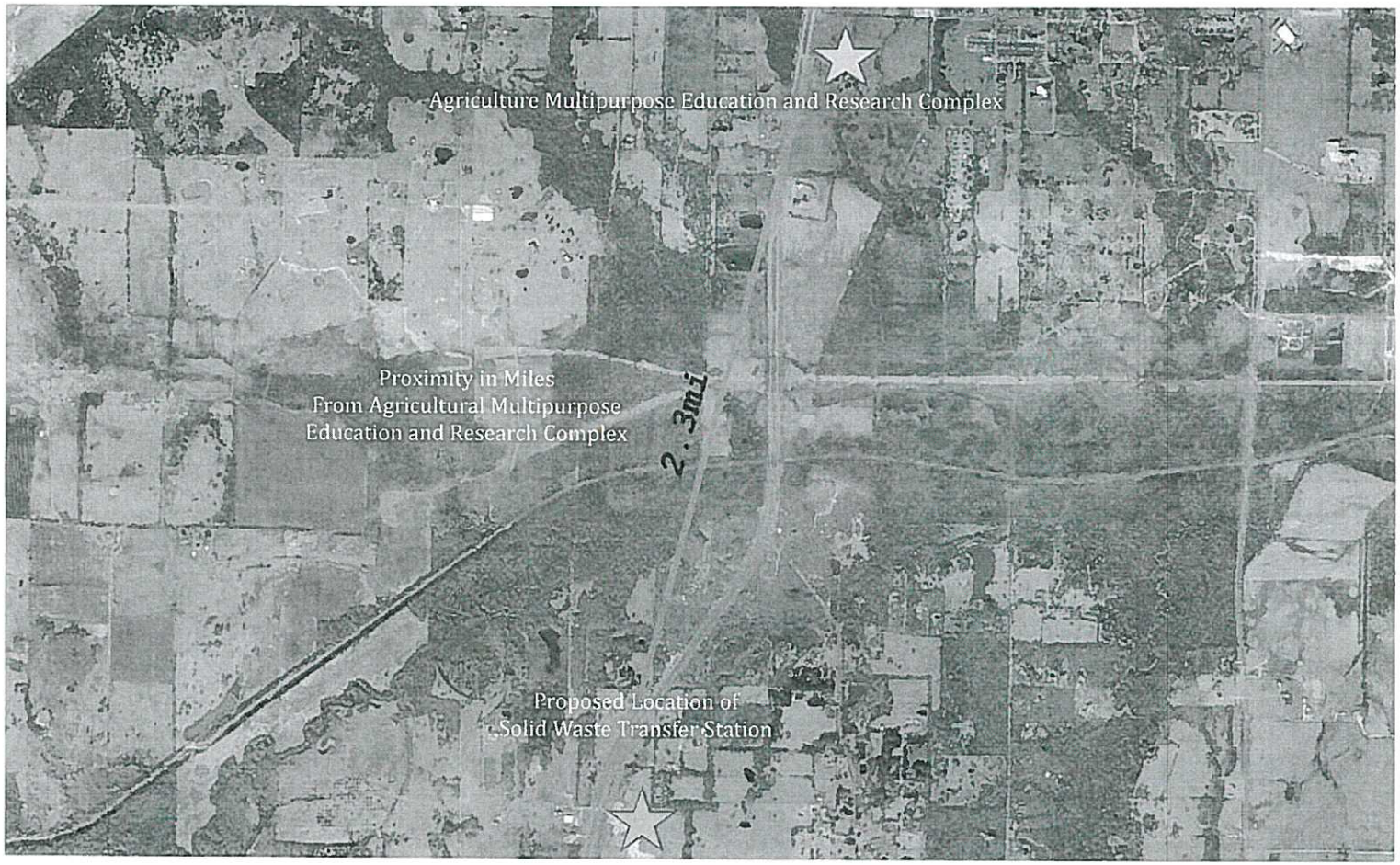
Mark Rudin
President

Attachments

c: Office of General Counsel, The Texas A&M University System


25379
Proximity in Feet
From TAMUC Property
TAMUC Vet Tech
& Greenhouse
247.9
Proposed Location of
Solid Waste Transfer Station
31327
25373
31332
126101
31331


University Farm
University Farm
University Farm
Proposed Location of
Solid Waste Transfer Station
107384
25373
25374
25405
107383
107739
107740
118569
35523
35529
35538
35525
35546
107583
22326
107181


Agriculture Multipurpose Education and Research Complex
Proximity in Miles
From Agricultural Multipurpose
Education and Research Complex
2.3mi
Proposed Location of
Solid Waste Transfer Station

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:29 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411
Attachments: TAMU-Commerce Presidents Comment Letter with Depictions (TCEQ Permit 2411).PDF

PM

From: Amanda.Scott@tamuc.edu <Amanda.Scott@tamuc.edu>
Sent: Monday, November 15, 2021 2:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Amanda Scott

E-MAIL: Amanda.Scott@tamuc.edu

COMPANY: Texas A&M University - Commerce

ADDRESS: 204 BROOKHAVEN TER
COMMERCE TX 75428-2002

PHONE: 4696620031

FAX:

COMMENTS: Since we have such high ground water levels, and lack of popper drainage I am most concerned about water run off with the trash liquids. There could be major environmental impacts to the farm life in the area and the natural wildlife. We are certain that allowing this project to proceed will result in at least the following issues: Odors and noise that will impact the University's students, veterinary instruction facility, agricultural facility, animal facilities, and

research projects; Increased traffic directly across from the entrance to University facilities that will endanger those accessing these University facilities; Visual impacts from the University, including from the upper levels of its campus buildings;

Since 1889

November 11, 2021

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78735

Ms. Laurie Gharis
Chief Clerk
Office of Chief Clerk, MC 105
TCEQ
P.O. Box 13087
Austin, TX 78711-3087

Re: Application of Transfer Station Solutions, LLC for Municipal Solid Waste Facility Permit

Dear Deputy Director Fritz and Chief Clerk Gharis:

Texas A&M University–Commerce (University), joins the many other concerned members of the Commerce community in opposition to the application of Transfer Station Solutions, LLC (Applicant) for a municipal solid waste facility under Permit No. 2411. The proposed transfer station will be situated directly across State Highway 24 from certain University teaching and research classrooms and facilities and is unsuitable for an educational environment (See depictions attached). In addition, the University requests more information on the Applicant's plan for the transportation of the transferred waste from the proposed transfer station. The University is concerned that such transferred waste will be taken by tractor trailers from the proposed station north along State Highway 24 running directly adjacent to the main campus of the University in Commerce to the final waste disposal site, exacerbating the negative effects on the University. The University is in the process of assessing the overall impact that this facility would have to its campus community and will submit a more formal response detailing our apprehensions, and we wanted to register our complete concern over this proposed facility.

We are certain that allowing this project to proceed will result in at least the following issues:

1. Odors and noise that will impact the University's students, veterinary instruction facility, agricultural facility, animal facilities, and research projects;
2. Increased traffic directly across from the entrance to University facilities that will endanger those accessing these University facilities;
3. Visual impacts from the University, including from the upper levels of its campus buildings;

4. Negative impacts to the University's ability to recruit faculty and students and to promote its educational opportunities due to odors, visual impacts, noise and presence of stray trash;
5. Negative impacts on the University's to-be-constructed Agricultural Expo Facility to be located on the University's property approximately 2.4 miles north of this proposed site on State Highway 24 (See depiction attached); and
6. Potential impacts to the local water table and harm to the many local water wells.

The University has worked hard and invested significantly to create a special learning and research environment that is attractive to students, faculty and alumni alike. This environment, which is critical to a successful campus and contributes to the entire Commerce community, is directly threatened by the odors, noise, traffic and environmental impact of a solid waste facility in such close proximity. The University requests that it be considered a stakeholder in all considerations of this application given the University's property is within 300 feet of the entrance to the proposed facility. We request that a public meeting be scheduled so that students, staff and faculty may have an opportunity to provide you with their thoughts on the impact a municipal solid waste facility will have on the campus.

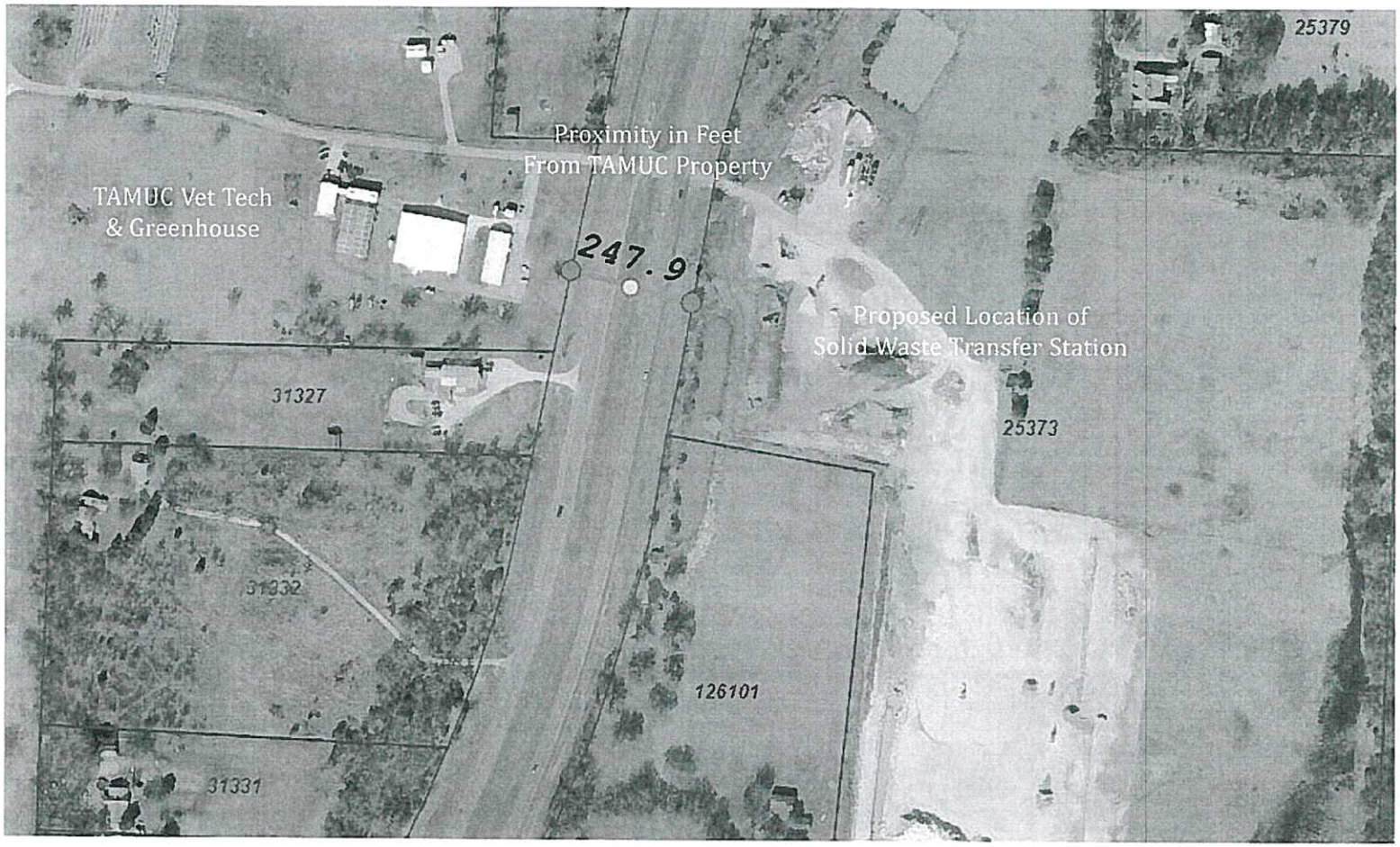
Thank you for your consideration of this important matter. Our contact for this matter will be Mr. Travis Ball, Texas A&M University-Commerce, at (903) 886-5060 or Travis.Ball@tamuc.edu.

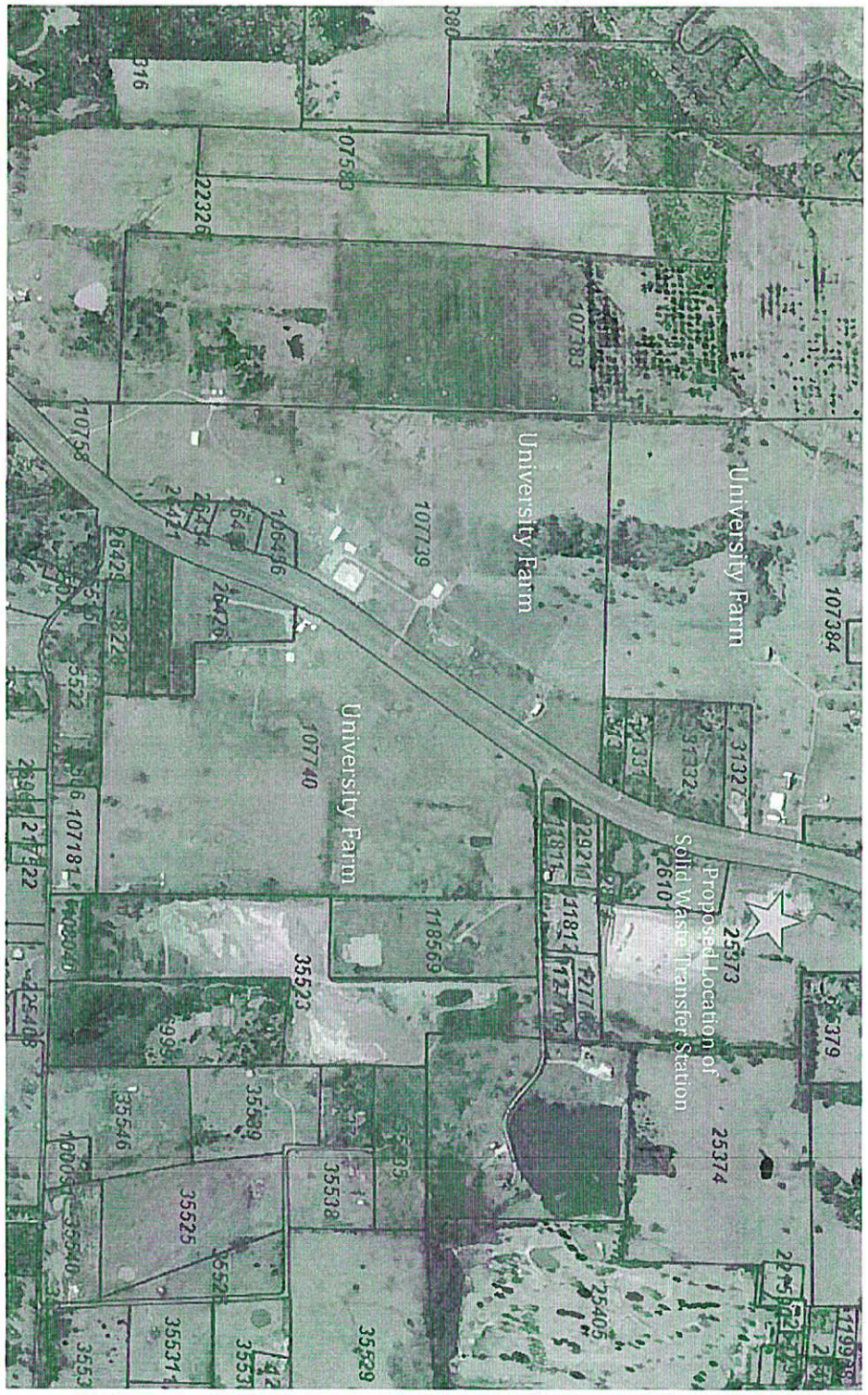
Sincerely,

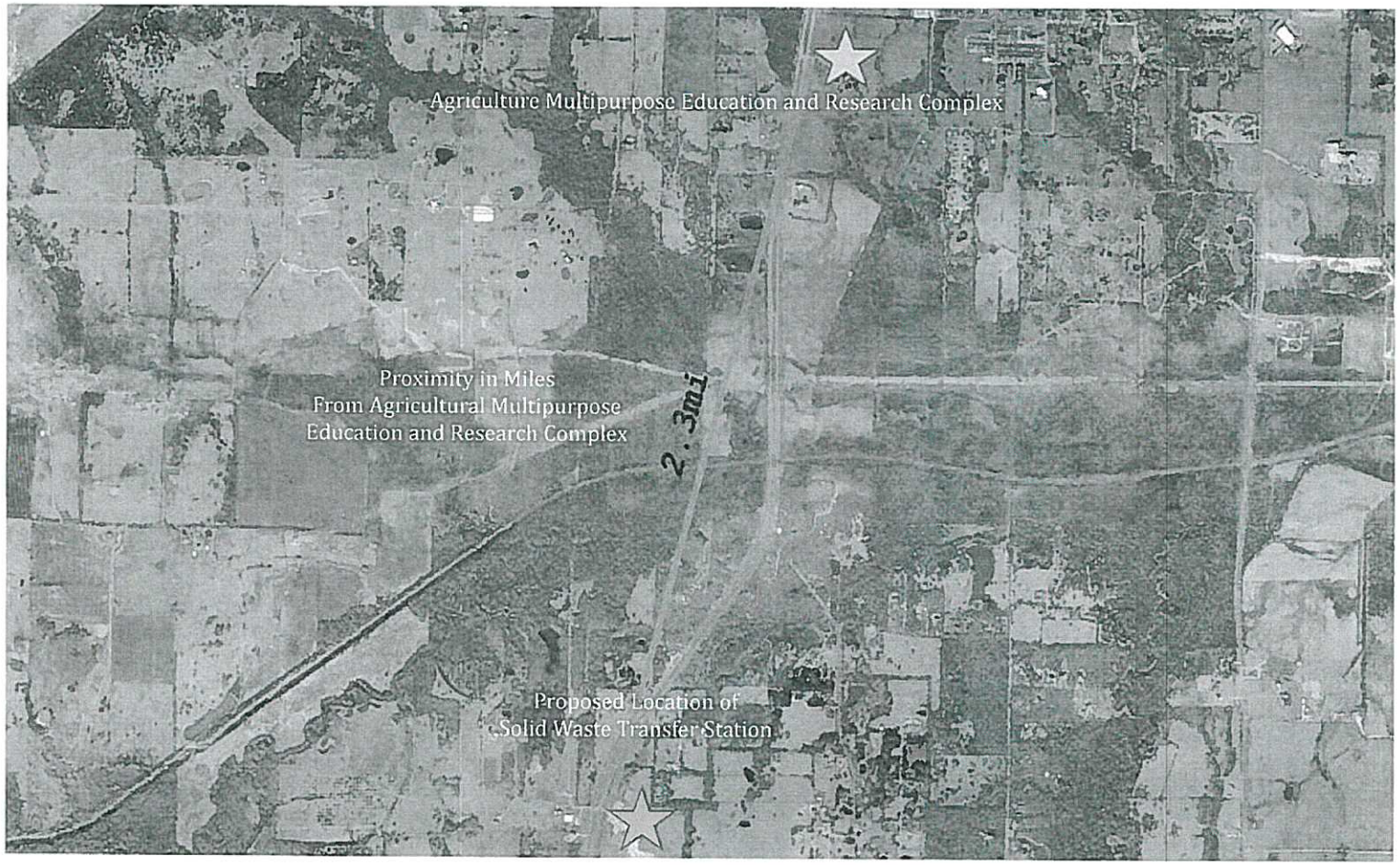
Mark Rudin
President

Attachments

c: Office of General Counsel, The Texas A&M University System


25379
Proximity in Feet
From TAMUC Property
TAMUC Vet Tech
& Greenhouse
247.9
Proposed Location of
Solid Waste Transfer Station
31327
25373
31332
126101
31331


University Farm
University Farm
University Farm
Proposed Location of
Solid Waste Transfer Station
107384
107739
107740
107583
107383
25373
25374
25405
35523
35525
35538
35529
35546
35539
35531
35522
107181
118569
22326
316
380


Agriculture Multipurpose Education and Research Complex
Proximity in Miles
From Agricultural Multipurpose
Education and Research Complex
2.3mi
Proposed Location of
Solid Waste Transfer Station

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 2:17 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Mstark77@gmail.com <Mstark77@gmail.com>
Sent: Tuesday, November 16, 2021 1:30 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Michael Stark

E-MAIL: Mstark77@gmail.com

COMPANY:

ADDRESS: 2804 MCCARLEY DR
COMMERCE TX 75428-3830

PHONE: 2626490348

FAX:

COMMENTS: As a resident of Commerce, TX, I am strongly opposed to a solid waste facility being built along the main access road to our city. This type of facility is unsightly and will have negative repercussions for our community, including property values. I also work at the largest employer located in Commerce, and believe that this facility will impact the perceptions of potential college students and their parents.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 2:13 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: pigeonsdaughter@gmail.com <pigeonsdaughter@gmail.com>
Sent: Tuesday, November 16, 2021 9:56 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Ashley Bryan

E-MAIL: pigeonsdaughter@gmail.com

COMPANY:

ADDRESS: 8880 STATE HIGHWAY 11 E
COMMERCE TX 75428-5202

PHONE: 3252608869

FAX:

COMMENTS: I oppose the permit of the pending permit for the solid waste facility. My major concern is that it would make an already struggling community an undesirable place to live. One of the advantages of living in commerce is the benefit of clean fresh air.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, November 17, 2021 12:34 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: tami.bishop@tamuc.edu <tami.bishop@tamuc.edu>
Sent: Wednesday, November 17, 2021 10:48 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Tami R Bishop

E-MAIL: tami.bishop@tamuc.edu

COMPANY: Texas A&M Commerce

ADDRESS: 6916 SILVER OAK CT
MCKINNEY TX 75072-5015

PHONE: 8328771936

FAX:

COMMENTS: As a Texas A&M Commerce student, task worker employee and North Texas resident, I do not agree with the proposal for a solid waste facility to be built near the University. Solid waste that is not managed properly can bring health hazards and infectious diseases to a community. This will also impact the economic value of our surrounding community, impacting future land cleanup with possible contamination and land resale value.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, November 17, 2021 9:56 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Courtney.Clanton@tamuc.edu <Courtney.Clanton@tamuc.edu>
Sent: Tuesday, November 16, 2021 3:29 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Courtney Clanton

E-MAIL: Courtney.Clanton@tamuc.edu

COMPANY: Texas A&M University Commerce

ADDRESS: 2600 W NEAL ST Library, Suite #173
COMMERCE TX 75428-4311

PHONE: 9032594099

FAX:

COMMENTS: I am opposed to the placement of this municipal solid waste facility. This location is too close to Univserity teaching and research sites. Also this location is along one of the major roads into the city of Commerce. This can negetively impact the city's ability to attract other types of economic growth.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, November 18, 2021 8:29 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: ngarcia22@leomail.tamuc.edu <ngarcia22@leomail.tamuc.edu>
Sent: Wednesday, November 17, 2021 6:34 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Noah Garcia

E-MAIL: ngarcia22@leomail.tamuc.edu

COMPANY:

ADDRESS: 604 1ST ST
TERRELL TX 75160-2002

PHONE: 9729789567

FAX:

COMMENTS: To whom it may concern, Building a highway transfer station to condense and compress garbage would be detrimental to both the city of Commerce, Texas, but also to Texas A&M University-Commerce. As stated in President Rudin's letter to TCEQ, building this facility would not only cause environmental harm to the the wildlife surrounding the Commerce, Texas area by way of water damage, increased invasive species harm, and by smell, but also the reputation of Commerce, Texas and TAMUC. We do not wish to be known as a garbage city or college. Thank you for your time.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, November 19, 2021 10:27 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: tedcrim1947@gmail.com <tedcrim1947@gmail.com>
Sent: Friday, November 19, 2021 7:40 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Ted R. Crim

E-MAIL: tedcrim1947@gmail.com

COMPANY:

ADDRESS: 2313 NEWCASTLE CIR
PLANO TX 75075-3328

PHONE: 9729641546

FAX:

COMMENTS: I am writing this message to express strong opposition for the potential construction of a solid waste disposal site near property owned by my collegiate alma mater, Texas A&M University-Commerce (TAMUC) and in close proximity of the TAMUC campus itself. TAMUC is among one of the oldest State institutions of higher education in Texas. The national historical figure Speaker of the U.S. House of Representatives Sam Rayburn is a graduate of TAMUC (Class of 1903) whose policies and programs continue to be felt today. The proposed construction of a solid waste facility in

the immediate vicinity of the TAMUC campus and adjacent to the University farm is highly ill advised for myriad reasons that should be obvious from even a cursory review of the facts in this matter. TAMUC was founded in 1889 and has prided itself on providing top tier academic quality in a safe and near pristine rural environment for over 132 years. TAMUC, at the time of its entry into the Texas A&M University System had existed well over a century with its own system (The East Texas State University System) and had achieved notable institutional accomplishments throughout its distinguished history including the introduction of the FIRST computer science program in the State of Texas. The proposed construction of a solid waste facility near the TAMUC campus degrades the environmental quality of the University on multiple levels including air, water, visual impact and the historically pristine rural location of the University and the broader community of Commerce, Texas. The availability of alternate locations for the solid waste facility to be constructed distant from the University and the City of Commerce is obvious and location of the solid waste facility near TAMUC presents an unnecessary and undesirable intrusion into the quiet and natural rural environment that surrounds the University itself and its outlying farms and experimental/research facilities. One final thought. If the solid waste facility was being planned for the Texas A&M University/College Station area, it is unlikely that either entity would embrace such a disruptive and undesirable operation to operate in their immediate vicinity. TAMUC is no different and considering placing such a disrutptive and environmentally harmful facility in the virtual backyard of the University's and the City of Commerce is unnecessary, unwanted and would have a negative effect on the operations of the University, the city in which it is located and the broader surrounding countryside. Please exert all available influence to reverse any and all pending plans for the construction of this ill conceived project in order that the pastoral quality of life that has existed for hundreds of years in the bucolic environment that surrounds TAMUC. With over 130.000 alumni, faculty, staff and students, TAMUC does not need nor deserve such an intrusive and debilitating influence to be installed near its campus and farms. Please do all that is possible to terminate plans for this unprecedented and destructive venture into the pleasant and picturesque landscape that surrounds the historical campus of Texas A&M University-Commerce where Presidents', notable authors, entertainers, scholars and others whose names are commonly known throughout the nation have visited the campus to enrich the educational experience at one of the nation's oldest and most respected institutions of higher education. Ted R. Crim Class of 1970

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 22, 2021 11:02 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
12/5/17

From: connie12345@icloud.com <connie12345@icloud.com>
Sent: Monday, November 22, 2021 11:02 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Connie Hale

E-MAIL: connie12345@icloud.com

COMPANY:

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034566017

FAX:

COMMENTS: One of my greatest concerns for this project is bringing greater volumes of traffic to an already busy 70 mile-an-hour highway. Not only am I concerned for my own safety going to town, but I have several of my family members who are actively involved in the Campbell Fire Department and are already called on for far too many motor-related accidents. Highway 24 was not built for this kind of traffic in mind.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 22, 2021 11:00 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: cfleming6@leomail.tamuc.edu <cfleming6@leomail.tamuc.edu>
Sent: Friday, November 19, 2021 5:12 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Cole R Fleming

E-MAIL: cfleming6@leomail.tamuc.edu

COMPANY:

ADDRESS: 6230 TAYLOR RD
KAUFMAN TX 75142-4844

PHONE: 9038216443

FAX:

COMMENTS: I am a student at A&M Commerce and I do not want a solid waste landfill near my school. Find a better solution please.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 22, 2021 7:35 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: bosharts@gmail.com <bosharts@gmail.com>
Sent: Sunday, November 21, 2021 5:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jay Boshart

E-MAIL: bosharts@gmail.com

COMPANY:

ADDRESS: 612 COUNTY ROAD 3101
GREENVILLE TX 75402-8810

PHONE: 9034611448

FAX:

COMMENTS: While I commend the idea of efficiency for the environment, as always location is one of the most important aspects for citizens and communities. Locating the transfer station in a quiet rural area with many residences brings traffic, odor and possible air and water contamination to the area. You must ask yourself, " Would I want this in my neighborhood". Your obvious answer would be NO.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 22, 2021 7:35 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: cindaboshart8@gmail.com <cindaboshart8@gmail.com>
Sent: Sunday, November 21, 2021 6:49 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Cinda Boshart

E-MAIL: cindaboshart8@gmail.com

COMPANY: NA

ADDRESS: 612 COUNTY ROAD 3101
GREENVILLE TX 75402-8810

PHONE: 9034505592

FAX:

COMMENTS: I am extremely concerned about the possibility of a trash transfer station going in at this location. I buy produce, pork, and eggs on a weekly basis from a farm very near the proposed location. The owners of this business operate as closely to an organic farm as possible, never using chemicals. It is hard to imagine that trash from the transfer station will not affect the quality of the soil of the surrounding lands. I am also concerned about the proposed transfer station's close proximity to the TAMU-C agricultural areas. They have invested in the land for decades, and the presence

of this station will surely affect the desirability of the agriculture program for prospective students. I sincerely hope the business will decide to move to a more suitable location.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 23, 2021 9:25 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: connie12345@icloud.com <connie12345@icloud.com>
Sent: Monday, November 22, 2021 6:58 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Connie Hale

E-MAIL: connie12345@icloud.com

COMPANY:

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034566017

FAX:

COMMENTS: One of my greatest concerns for this project is bringing greater volumes of traffic to an already busy 70 mile-an-hour highway. Not only am I concerned for my own safety going to town, but I have several of my family members who are actively involved in the Campbell Fire Department and are already called on for far too many motor-related accidents. Highway 24 was not built for this kind of traffic in mind.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 23, 2021 9:24 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: sarah.helm@exprealty.com <sarah.helm@exprealty.com>
Sent: Monday, November 22, 2021 7:15 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Sarah Helm

E-MAIL: sarah.helm@exprealty.com

COMPANY:

ADDRESS: 958 STATE HIGHWAY 24
CAMPBELL TX 75422-1338

PHONE: 9034080557

FAX:

COMMENTS: I am deeply concerned about this proposed facility and how it would change the neighborhood and the immediate property values around it.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 23, 2021 9:22 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: sarah.helm@exprealty.com <sarah.helm@exprealty.com>
Sent: Tuesday, November 23, 2021 7:30 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Sarah Helm

E-MAIL: sarah.helm@exprealty.com

COMPANY:

ADDRESS: 958 STATE HIGHWAY 24
CAMPBELL TX 75422-1338

PHONE: 9034080557

FAX:

COMMENTS: I am deeply concerned about this proposed facility and how it would change the neighborhood and the immediate property values around it.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 23, 2021 8:15 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: connie12345@icloud.com <connie12345@icloud.com>
Sent: Monday, November 22, 2021 3:25 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Connie Hale

E-MAIL: connie12345@icloud.com

COMPANY:

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034566017

FAX:

COMMENTS: One of my greatest concerns for this project is bringing greater volumes of traffic to an already busy 70 mile-an-hour highway. Not only am I concerned for my own safety going to town, but I have several of my family members who are actively involved in the Campbell Fire Department and are already called on for far too many motor-related accidents. Highway 24 was not built for this kind of traffic in mind.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 8, 2021 9:12 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: renee_humphries71@hotmail.com <renee_humphries71@hotmail.com>
Sent: Friday, November 5, 2021 4:59 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Renee Humphries

E-MAIL: renee_humphries71@hotmail.com

COMPANY:

ADDRESS: 1820 PRIVATE ROAD 4225
CAMPBELL TX 75422-1838

PHONE: 9034560431

FAX:

COMMENTS: We are opposing the proposed Transfer Station Permit 2411 because we have a water well and concerned about it becoming contaminated. We also have concerns about the foul smells and the additional traffic it will bring to our residential area. We have not been officially notified of the proposed transfer station and want more information on how it could pollute our water well and how the TCEQ will protect us from such hazards.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, November 10, 2021 8:11 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: cgiles@gilesgroup.net <cgiles@gilesgroup.net>
Sent: Tuesday, November 9, 2021 3:01 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Cathy Giles

E-MAIL: cgiles@gilesgroup.net

COMPANY:

ADDRESS: PO BOX 58
CAMPBELL TX 75422-0058

PHONE: 8179462875

FAX:

COMMENTS: Owning a home is the "American Dream." It is outrageous that a waste transfer station is being constructed in the middle of a residential neighborhood zone where our children and grandchildren will be physically and mentally devastated by the stench and biological pollution to our air, water and land, twenty-four hours per day for the next 100 years or longer! Our family has many distinguished veterans who have fought and died for the right to have freedom in this great nation. Let us not dishonor their service by polluting with reckless disregard, the homes they built

for their families and future generations. This property is on top of an aquifer. Surely we know better by now not to poison our own source of drinking water for the local communities. Waste belongs outside of the cities, not directly in the middle of a residential area. The residents will suffer horribly from health problems and will immediately lose the current value of their land and homes which have been their greatest life-long investment. I respectfully implore the TCEQ to cancel this application for a landfill in the middle of our neighborhood. Thank you.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 29, 2021 8:39 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: richard.helge@tamuc.edu <richard.helge@tamuc.edu>
Sent: Wednesday, November 24, 2021 10:45 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Richard A Helge

E-MAIL: richard.helge@tamuc.edu

COMPANY: Texas A&M University - Commerce

ADDRESS: 1610 SYCAMORE ST
COMMERCE TX 75428-2576

PHONE: 9034585506

FAX:

COMMENTS: I am in opposition to the transfer Station being located so near the University and my place of residence. The additional smell, traffic and congestion is unwanted for a business that will not be of any use to the community. A business of this type should not be anywhere within miles of a city. Odors, noise and traffic is a negative impact for the City of Commerce it's citizens and the University community. Please do not allow this type of business in our area.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 3, 2021 12:38 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: randy.harp@tamuc.edu <randy.harp@tamuc.edu>
Sent: Friday, December 3, 2021 12:38 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Randy Harp

E-MAIL: randy.harp@tamuc.edu

COMPANY: Texas A&M Commerce

ADDRESS: PO BOX 3011
COMMERCE TX 75429-3011

PHONE: 9038865358

FAX:

COMMENTS: I am in agreement with the letter from Dr. Mark Rudin, President at Texas A&M Commerce. I serve as the Dean for the College of Agricultural Sciences and Natural Resources. In this capacity, I hold the responsibility for the welfare and safety of our students, facilities and animals. In addition to Dr. Rudin's comments and concerns, the traffic that will incur because of the potential Solid Waste Transfer Station will compound with the 100 plus students entering and exiting (many times daily) at an intersection that is a 75 mph highway. There are no plans for additional access

roads, etc. within the proposal for the Transfer Station, and thus, the danger magnifies with this situation. The large trucks that will be used will cause additional danger on this already busy highway. This should be a TXDOT issue too. thank you

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 3, 2021 12:43 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411
Attachments: Letter opposing solid waste facility in Hunt County.docx

From: kaypri1967@yahoo.com <kaypri1967@yahoo.com>
Sent: Friday, December 3, 2021 10:44 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Kayla Price

E-MAIL: kaypri1967@yahoo.com

COMPANY:

ADDRESS: 2001 HOUSTON ST
SULPHUR SPRINGS TX 75482-5903

PHONE: 9033350705

FAX:

COMMENTS: I want to express my opposition to the proposed solid waste facility (Permit No. 2411) to be located at 3491 State Highway 24 in Commerce. I know this is the sort of thing that everyone says they prefer not to have in their neighborhood, yet we need this type of facility to exist somewhere. However, there are several problems with the proposed location, all of which negatively impact the State of Texas and its citizens. Although I no longer live or work in

Commerce, my reason for speaking up is that I am an alumna of Texas A&M University-Commerce, and my family has a long association with Old ET starting in 1935. Having lived and owned a home in Commerce for several years, I know the challenges that this community already faces. There are several reasons this location is not appropriate for a solid waste facility, but the three main reasons listed below adequately make the point. They are: 1. It will create a safety hazard by adding more traffic to Hwy 24. This is a road heavily traveled by university students, faculty and staff. It is foolhardy to add more trucks to the mix and endanger travelers on Hwy 24, many of whom are young people. There is a significant increase in 18-wheeler traffic on that Highway since I moved from Commerce in 2004, yet Highway 24 still has the same number of lanes. 2. The location of a solid waste facility at the proposed site will lower the value of State property, which affects all taxpayers in the State. 3. Highway 24 is the main entry to Commerce and the University. Approval of said location would have a significant and adverse impact on Commerce's ability to market itself to new businesses and residents. Furthermore, the University could face a major hurdle in recruiting both students and staff. Between the look of solid waste facilities, the odor connected with said facility, and the increased traffic, if this proposal is approved, it will have a devastating effect on the economy of that area. This is an area already burdened with a higher-than-average percent of low-income families, and a town that relies heavily on the University for income. Residents with income below the poverty level in 2019: Commerce: 36.6% Whole state: 13.6% Residents with income below 50% of the poverty level in 2019: Commerce: 23.1% Whole state: 6.0% Read more: https://www.city-data.com/poverty/poverty-Commerce-Texas.html One more aspect to consider is the fact that Commerce is more ethnically and racially diverse than Texas in general. It is possible that allowing such industry to locate here might be construed as an unfair or discriminatory toward some of the residents of the community. Commerce residents are: White (non-Hispanic) 53%, Black or African-American 23.4%, Hispanic 11%, and Asian 6.08%. Every parent sending their student to college wants a safe and clean environment for their students to flourish. With the City and University already suffering from the arsenic contamination that occurred in and prior to the 1990s, this community does not need another negative environmental impact. I am sure the Transfer Station Solutions, LLC could find a more appropriate location that would not have such a detrimental effect on an entire town and University. There are plenty of easily accessible, yet more remote locations available that would not have the potential to harm so many people and businesses. Please consider all the ramifications of this decision. It could negatively impact in many ways the City of Commerce and even possibly lead to serious and irreconcilable damage to Texas A&M-Commerce.

December 3, 2021

To Whom It May Concern

I want to express my opposition to the proposed solid waste facility (Permit No. 2411) to be located at 3491 State Highway 24 in Commerce. I know this is the sort of thing that everyone says they prefer not to have in their neighborhood, yet we need this type of facility to exist somewhere. However, there are several problems with the proposed location, all of which negatively impact the State of Texas and its citizens.

Although I no longer live or work in Commerce, my reason for speaking up is that I am an alumna of Texas A&M University-Commerce, and my family has a long association with Old ET starting in 1935. Having lived and owned a home in Commerce for several years, I know the challenges that this community already faces.

There are several reasons this location is not appropriate for a solid waste facility, but the three main reasons listed below adequately make the point. They are:

1. It will create a safety hazard by adding more traffic to Hwy 24. This is a road heavily traveled by university students, faculty and staff. It is foolhardy to add more trucks to the mix and endanger travelers on Hwy 24, many of whom are young people. There is a significant increase in 18-wheeler traffic on that Highway since I moved from Commerce in 2004, yet Highway 24 still has the same number of lanes.

2. The location of a solid waste facility at the proposed site will lower the value of State property, which affects all taxpayers in the State.

3. Highway 24 is the main entry to Commerce and the University. Approval of said location would have a significant and adverse impact on Commerce's ability to market itself to new businesses and residents. Furthermore, the University could face a major hurdle in recruiting both students and staff.

Between the look of solid waste facilities, the odor connected with said facility, and the increased traffic, if this proposal is approved, it will have a devastating effect on the economy of that area. This is an area already burdened with a higher-than-average percent of low-income families, and a town that relies heavily on the University for income.

Residents with income below the poverty level in 2019:
Commerce: 36.6%
Whole state: 13.6%

Residents with income below 50% of the poverty level in 2019:
Commerce: 23.1%
Whole state: 6.0%

Read more: https://www.city-data.com/poverty/poverty-Commerce-Texas.html

One more aspect to consider is the fact that Commerce is more ethnically and racially diverse than Texas in general. It is possible that allowing such industry to locate here might be construed as an unfair or discriminatory toward some of the residents of the community.

Commerce residents are: White (non-Hispanic) 53%, Black or African-American 23.4%, Hispanic 11%, and Asian 6.08%.

Every parent sending their student to college wants a safe and clean environment for their students to flourish. With the City and University already suffering from the arsenic contamination that occurred in and prior to the 1990s, this community does not need another negative environmental impact.

I am sure the Transfer Station Solutions, LLC could find a more appropriate location that would not have such a detrimental effect on an entire town and University. There are plenty of easily accessible, yet more remote locations available that would not have the potential to harm so many people and businesses.

Please consider all the ramifications of this decision. It could negatively impact in many ways the City of Commerce and even possibly lead to serious and irreconcilable damage to Texas A&M-Commerce.

Sincerely,

Kayla Price

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, December 8, 2021 11:02 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: Stevensleeanne@yahoo.com <Stevensleeanne@yahoo.com>
Sent: Wednesday, December 8, 2021 2:26 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Leanne Stevens

E-MAIL: Stevensleeanne@yahoo.com

COMPANY:

ADDRESS: 5844 COUNTY ROAD 3204
CAMPBELL TX 75422-5126

PHONE: 2145338546

FAX:

COMMENTS: This is awful. I moved from the city to the country for the great air and to get away from the pollution and now... you are moving it 2.5 miles away from me! Absolutely not. This can not be allowed we are a small community. Do you know the health affects that have risen our rates in pediatric allergens and in particular asthma. The location you have selected for this permit and pollution site to occur is near a school with over 350+ students. Should I start data collection on patients with allergies near the site what would the data reflect after implementing this in 5 years time? Is

it worth the money to cause an increase risk to our kids welfare? This is my concern. I am a mom, a healthcare provider and this should not be something that is near our homes. They can find a more appropriate location that reduces the risks to all.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, December 8, 2021 11:03 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: mmthoffmann@gmail.com <mmthoffmann@gmail.com>
Sent: Tuesday, December 7, 2021 6:14 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Michael Hoffmann

E-MAIL: mmthoffmann@gmail.com

COMPANY: none

ADDRESS: PO BOX 71
CAMPBELL TX 75422-0071

PHONE: 9032747453

FAX:

COMMENTS: I do not want this additional trash company in our community. We already have the Malloy dump just around the corner. One trash heap is enough.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 10, 2021 3:30 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: windymeadowsfarm@gmail.com <windymeadowsfarm@gmail.com>
Sent: Friday, December 10, 2021 3:26 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Connie Hale

E-MAIL: windymeadowsfarm@gmail.com

COMPANY: Windy Meadows Family Farm

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034565579

FAX:

COMMENTS: I have learned that the level of garbage that would be accepted by this facility is Level 5, which means that there is no limit to the type and chemistry of materials brought here to be processed in our neighborhood. The location of this facility is directly above the recharge zone for the aquafer that supplies the well for all of the families surounding it, including MY family. We cannot allow something like this to affect the purity of the water in our neighborhood.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 10, 2021 12:49 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jtcolclasure@hotmail.com <jtcolclasure@hotmail.com>
Sent: Friday, December 10, 2021 11:25 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Colclasure Tammy

E-MAIL: jtcolclasure@hotmail.com

COMPANY:

ADDRESS: 170 COUNTY ROAD 4624
COOPER TX 75432-6425

PHONE: 9033003910

FAX:

COMMENTS: Level 5 can include hazardous waste which can affect animals, wildlife, run of into alleyways, aquifers existing under curvy property, air quality, property owners and taxes.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 10, 2021 12:49 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: tkpmccord@gmail.com <tkpmccord@gmail.com>
Sent: Friday, December 10, 2021 11:31 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Tina Mccord

E-MAIL: tkpmccord@gmail.com

COMPANY:

ADDRESS: 4422 COUNTY ROAD 2301
SULPHUR SPRINGS TX 75482-7836

PHONE: 9034400746

FAX:

COMMENTS: This is not a good idea at all. So much agriculture would be effected and kids from kindergarten to post grads in college would be affected. Don't let money talk.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 10, 2021 8:26 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Windymeadowsfarm@gmail.com <Windymeadowsfarm@gmail.com>
Sent: Thursday, December 9, 2021 7:16 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Mike W Hale

E-MAIL: Windymeadowsfarm@gmail.com

COMPANY:

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

PHONE: 9034566024

FAX:

COMMENTS: I have an organic chicken farm about a mile form this site. I'm also on the local water board. We get our water from local wells. Affluent?

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 10, 2021 8:26 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Fizteach@swbell.net <Fizteach@swbell.net>
Sent: Thursday, December 9, 2021 7:51 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Robert Angus Sutherland

E-MAIL: Fizteach@swbell.net

COMPANY:

ADDRESS: 1507 S PATTERSON ST
CAMPBELL TX 75422-2810

PHONE: 2145431149

FAX:

COMMENTS: Eight years ago I moved my family to the country after 30 years living in Dallas. Allowing a waste transfer station to move right across the road from my veterinarian! This permit will allow the roads around and in my little town to become crowded a and dangerous to my grandkids, farm animals, and pets. Please do not allow this permit to be approved.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, December 10, 2021 3:37 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: windymeadowsfamilyfarm@gmail.com <windymeadowsfamilyfarm@gmail.com>
Sent: Friday, December 10, 2021 3:35 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Connie HALE

E-MAIL: windymeadowsfamilyfarm@gmail.com

COMPANY:

ADDRESS: 8045 COUNTY ROAD 4209
CAMPBELL TX 75422-1805

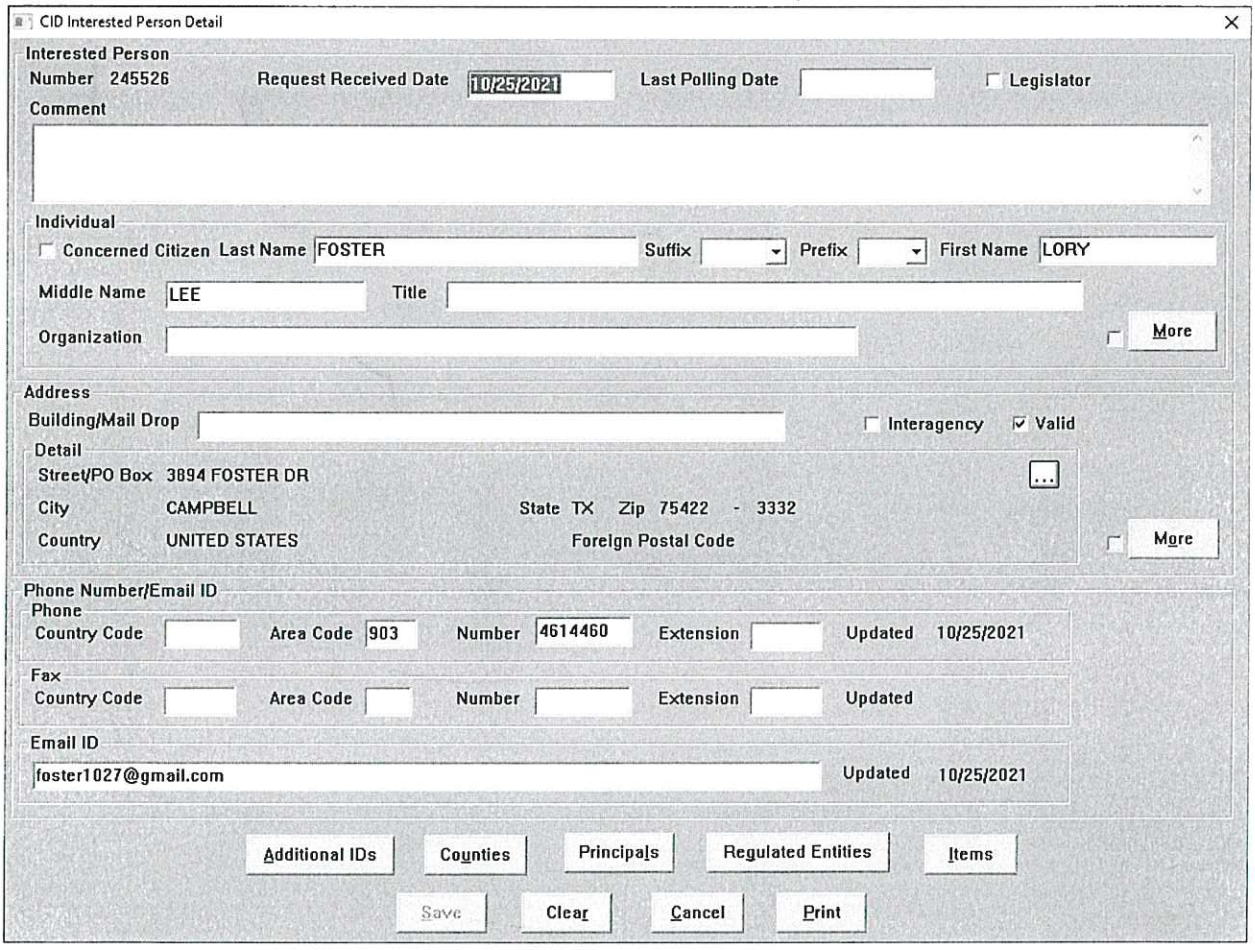
PHONE: 9034566017

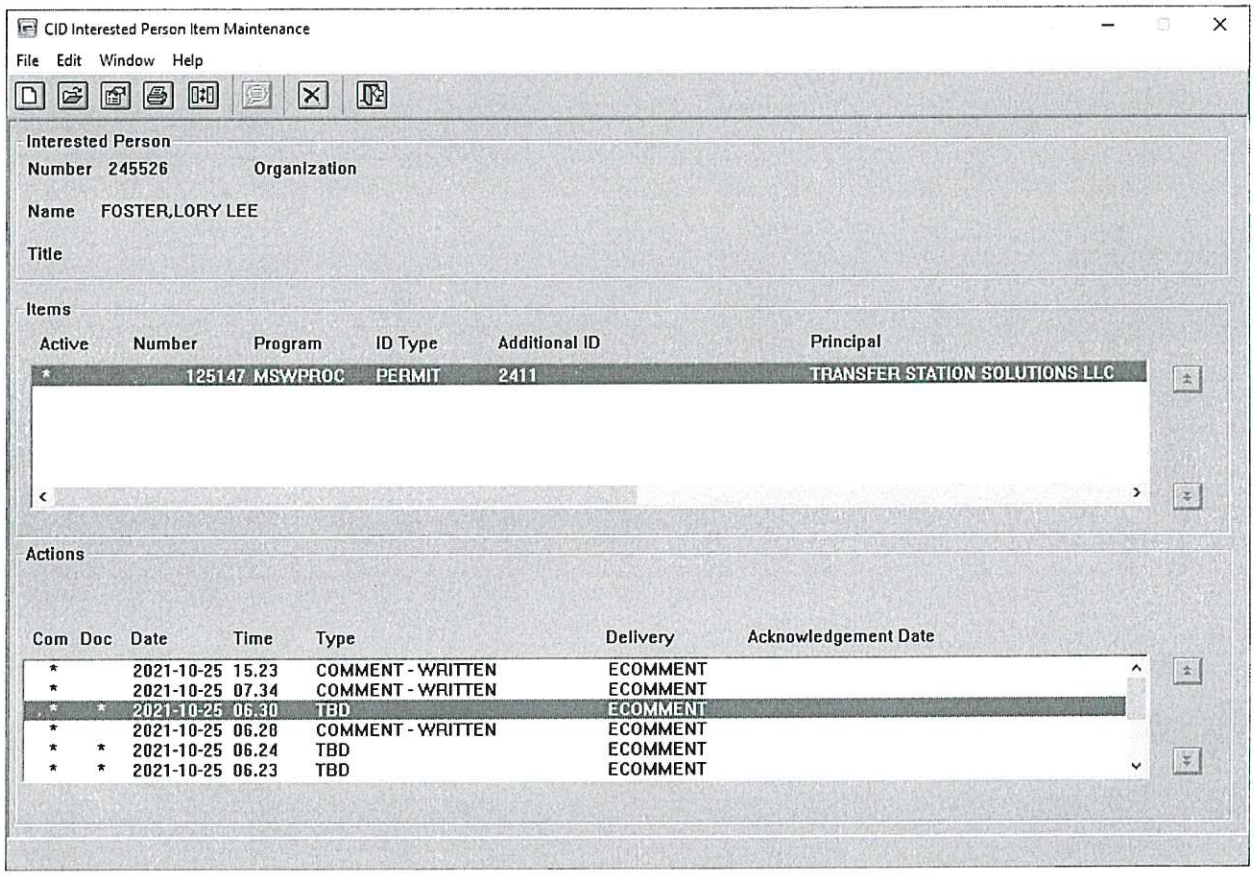
FAX:

COMMENTS: I have a major concern for the waste transfer station that is proposed for our neighborhood, for it is a neighborhood, even though our houses maybe further apart than in a town, we care about each other. I know that there are many of my neighbors that have small children that will be traveling by bus to and from school that use Hwy 24. The increase in traffic of large vehicles would be a danger to the welfare of our children, especially since I understand there are no plans to put any special entrance to this facility for the trucks to slow down and enter the plant.

MSW
12/14/17

REVIEWED
NOV 03 2021
By GCW




CID Interested Person Item Maintenance
File Edit Window Help
Interested Person
Number 245526 Organization
Name FOSTER,LORY LEE
Title
Items
Active Number Program ID Type Additional ID Principal
* 125147 MSWPROC PERMIT 2411 TRANSFER STATION SOLUTIONS LLC
Actions
Com Doc Date Time Type Delivery Acknowledgement Date
* 2021-10-25 15.23 COMMENT - WRITTEN ECOMMENT
* 2021-10-25 07.34 COMMENT - WRITTEN ECOMMENT
* * 2021-10-25 06.30 TBD ECOMMENT
* 2021-10-25 06.28 COMMENT - WRITTEN ECOMMENT
* * 2021-10-25 06.24 TBD ECOMMENT
* * 2021-10-25 06.23 TBD ECOMMENT

Protestant Comments

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Documents

FileName
☐ Garbage Processing Facility Proposed Location.docx

Prev | Next | Save | Cancel | Print

MSW
125147

REVIEWED
NOV 03 2021
By GCW

Garbage Processing Facility Proposed Location

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

REVIEWED
NOV 03 2021
By GCW

MSW
125147

CID Interested Person Detail

Interested Person

Number 245526 | Request Received Date 10/25/2021 | Last Polling Date | ☐ Legislator

Comment

Individual

☐ Concerned Citizen | Last Name FOSTER | Suffix | Prefix | First Name LORY

Middle Name LEE | Title

Organization | ☐ More

Address

Building/Mail Drop | ☐ Interagency | ☑ Valid

Detail

Street/PO Box 3894 FOSTER DR | ...

City CAMPBELL | State TX | Zip 75422 - 3332

Country UNITED STATES | Foreign Postal Code | ☐ More

Phone Number/Email ID

Phone

Country Code | Area Code 903 | Number 4614460 | Extension | Updated 10/25/2021

Fax

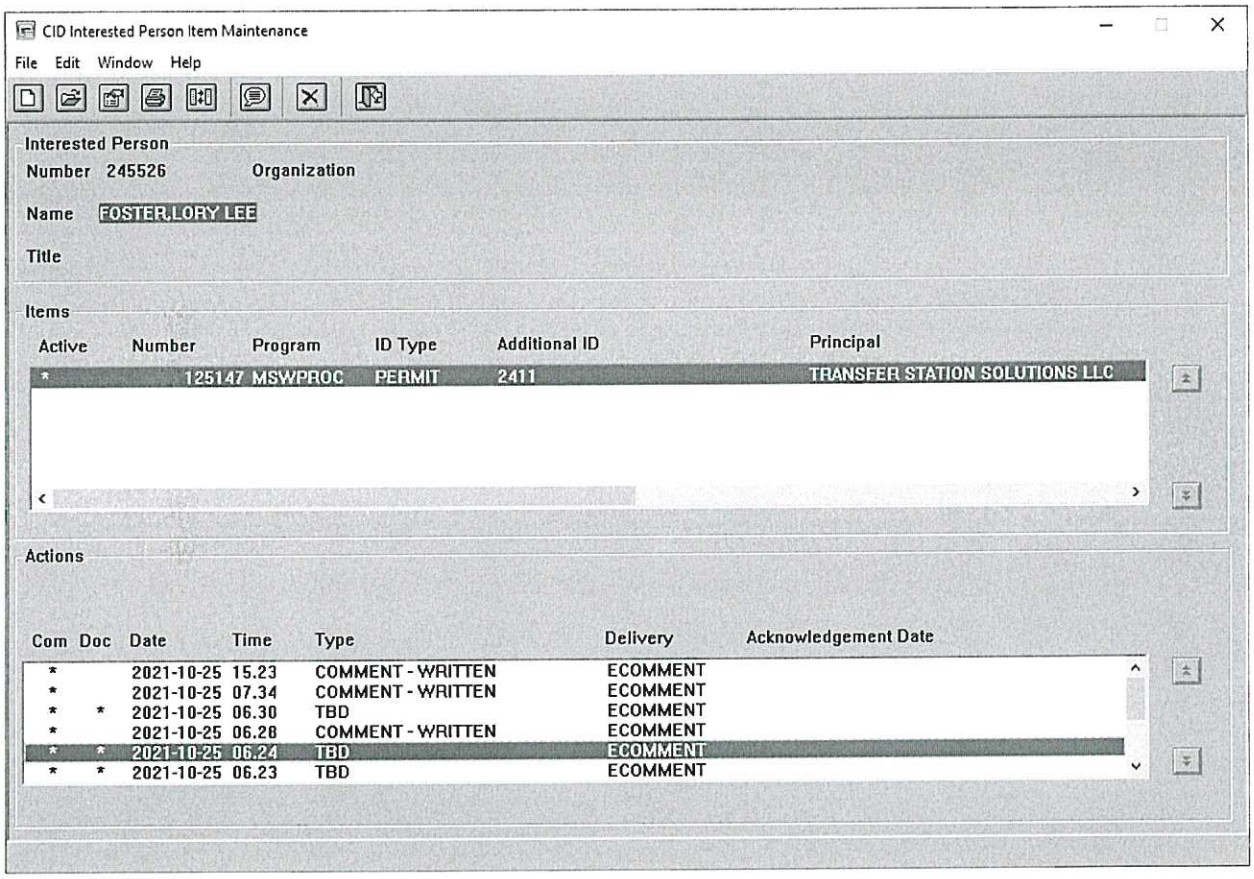
Country Code | Area Code | Number | Extension | Updated

Email ID

foster1027@gmail.com | Updated 10/25/2021

Additional IDs | Counties | Principals | Regulated Entities | Items

Save | Clear | Cancel | Print


CID Interested Person Item Maintenance
File Edit Window Help
Interested Person
Number 245526 Organization
Name FOSTER,LORY LEE
Title
Items
Active Number Program ID Type Additional ID Principal
* 125147 MSWPROC PERMIT 2411 TRANSFER STATION SOLUTIONS LLC
Actions
Com Doc Date Time Type Delivery Acknowledgement Date
* 2021-10-25 15.23 COMMENT - WRITTEN ECOMMENT
* 2021-10-25 07.34 COMMENT - WRITTEN ECOMMENT
* * 2021-10-25 06.30 TBD ECOMMENT
* 2021-10-25 06.28 COMMENT - WRITTEN ECOMMENT
* * 2021-10-25 06.24 TBD ECOMMENT
* * 2021-10-25 06.23 TBD ECOMMENT

Protestant Comments

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Documents

FileName
☐ Garbage Processing Facility Proposed Location.docx

Prev | Next | Save | Cancel | Print

MSW
125147

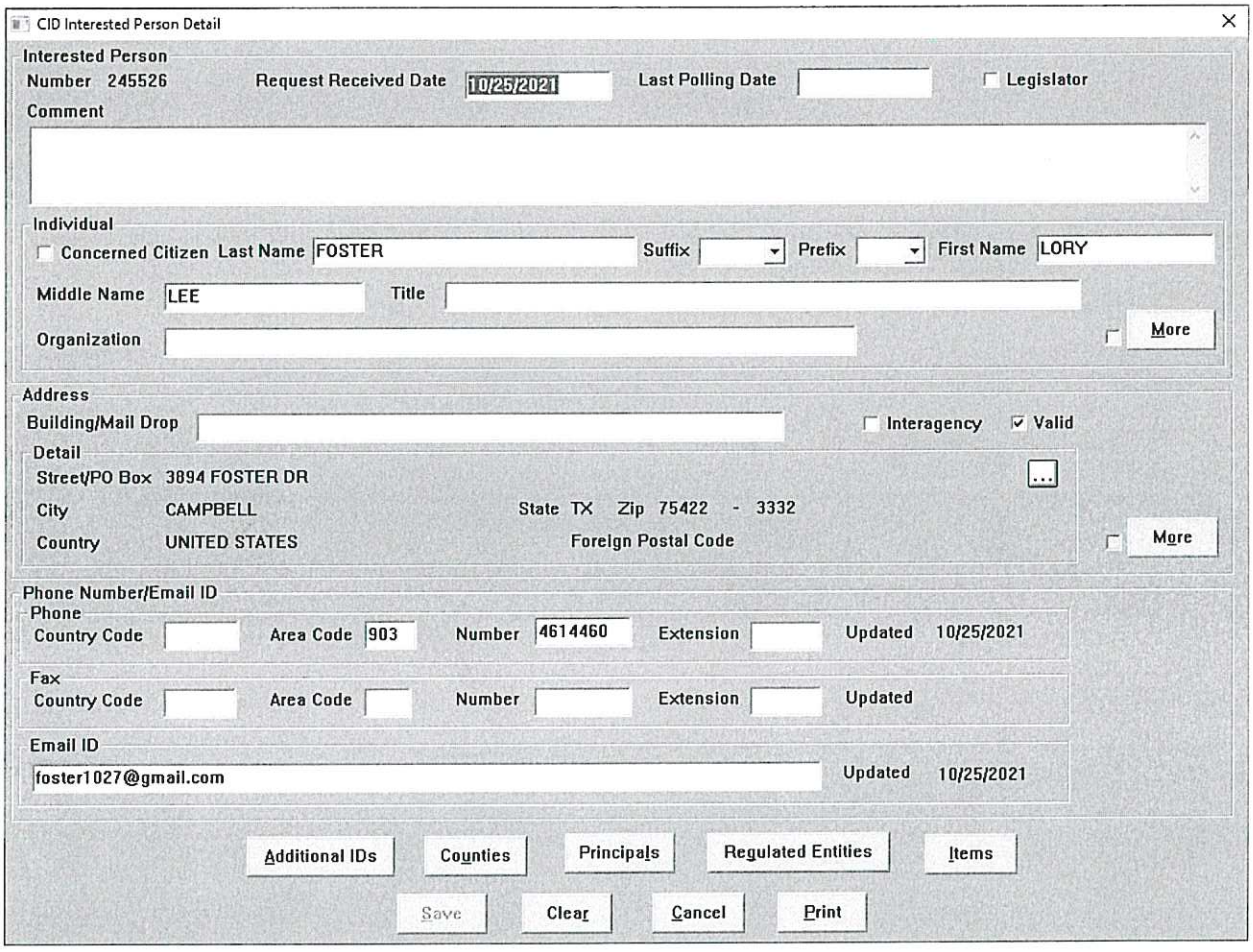
REVIEWED
NOV 03 2021
By GCW

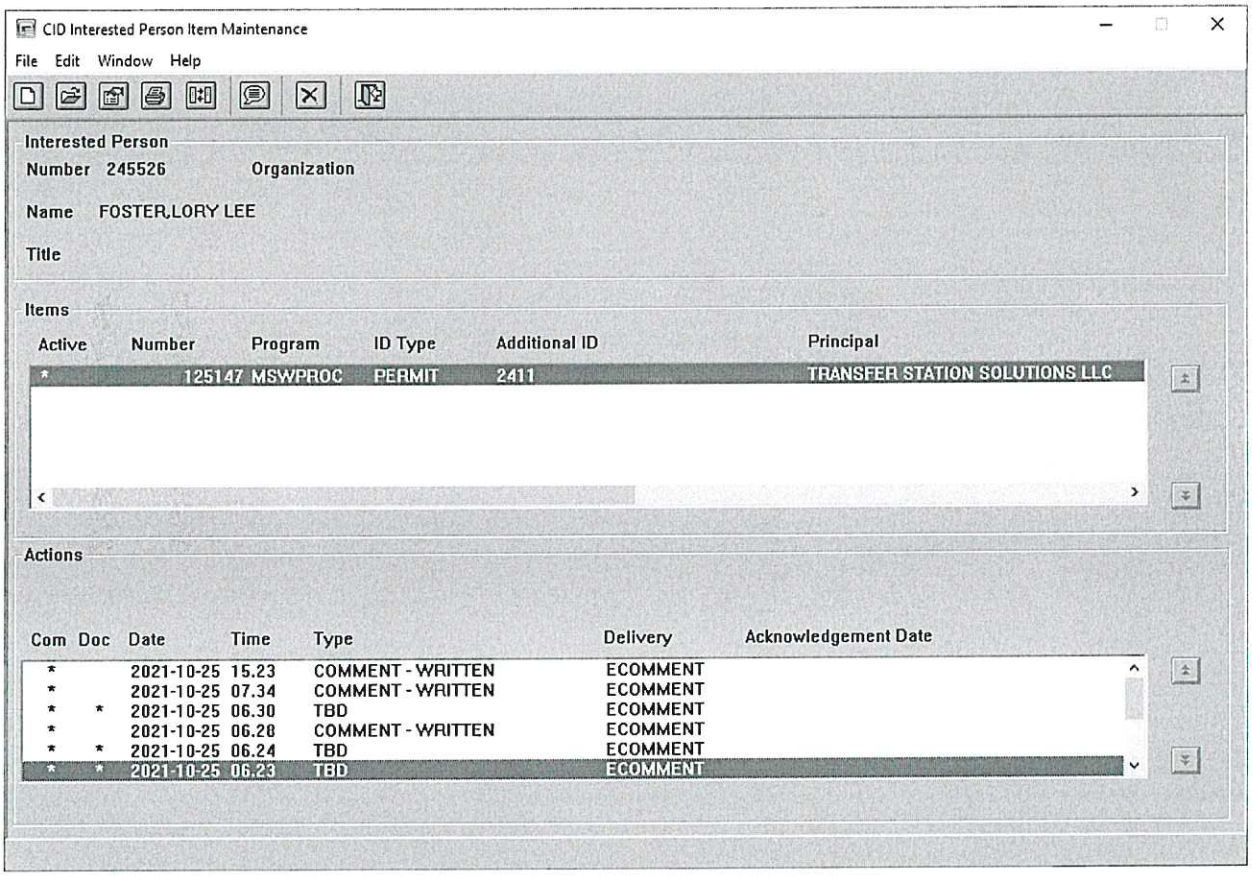
Garbage Processing Facility Proposed Location

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

REVIEWED
NOV 03 2021
By GCW

MSW
125147




CID Interested Person Item Maintenance
File Edit Window Help
Interested Person
Number 245526 Organization
Name FOSTER,LORY LEE
Title
Items
Active Number Program ID Type Additional ID Principal
* 125147 MSWPROC PERMIT 2411 TRANSFER STATION SOLUTIONS LLC
Actions
Com Doc Date Time Type Delivery Acknowledgement Date
* 2021-10-25 15.23 COMMENT - WRITTEN ECOMMENT
* 2021-10-25 07.34 COMMENT - WRITTEN ECOMMENT
* * 2021-10-25 06.30 TBD ECOMMENT
* 2021-10-25 06.28 COMMENT - WRITTEN ECOMMENT
* * 2021-10-25 06.24 TBD ECOMMENT
* * 2021-10-25 06.23 TBD ECOMMENT

Protestant Comments

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Documents

FileName
☐ Garbage Processing Facility Proposed Location.docx

Prev | Next | Save | Cancel | Print

REVIEWED
NOV 03 2021
By GW

MSW
125147

Garbage Processing Facility Proposed Location

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

REVIEWED
NOV 03 2021
By GCW

MSW
125147

CID Interested Person Detail

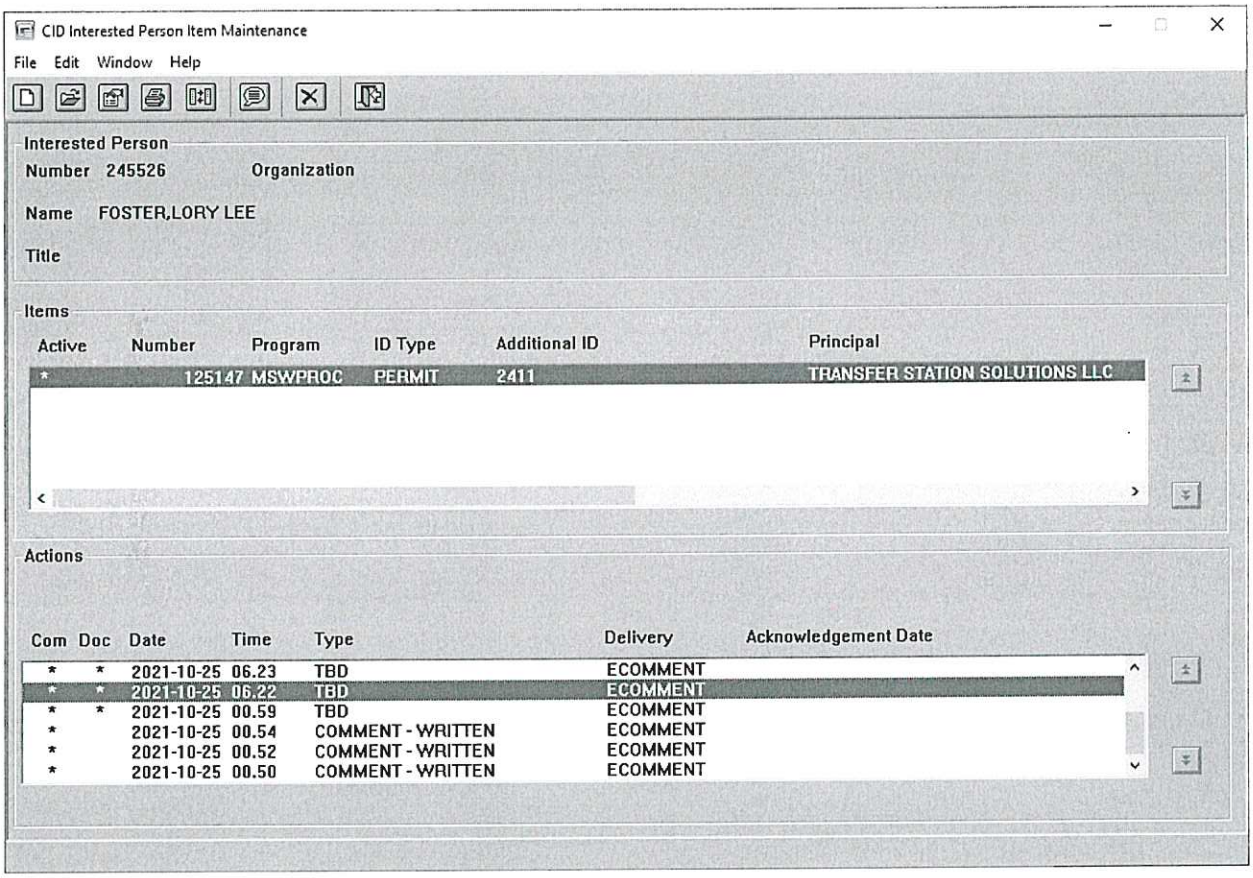
Interested Person
Number 245526 Request Received Date 10/25/2021 Last Polling Date ☐ Legislator
Comment

Individual
☐ Concerned Citizen Last Name FOSTER Suffix Prefix First Name LORY
Middle Name LEE Title
Organization ☐ More

Address
Building/Mail Drop ☐ Interagency ☑ Valid
Detail
Street/PO Box 3894 FOSTER DR
City CAMPBELL State TX Zip 75422 - 3332
Country UNITED STATES Foreign Postal Code ☐ More

Phone Number/Email ID
Phone
Country Code Area Code 903 Number 4614460 Extension Updated 10/25/2021
Fax
Country Code Area Code Number Extension Updated
Email ID
foster1027@gmail.com Updated 10/25/2021

Additional IDs | Counties | Principals | Regulated Entities | Items
Save | Clear | Cancel | Print


CID Interested Person Item Maintenance
File Edit Window Help
Interested Person
Number 245526 Organization
Name FOSTER,LORY LEE
Title
Items
Active Number Program ID Type Additional ID Principal
* 125147 MSWPROC PERMIT 2411 TRANSFER STATION SOLUTIONS LLC
Actions
Com Doc Date Time Type Delivery Acknowledgement Date
* * 2021-10-25 06.23 TBD ECOMMENT
* * 2021-10-25 06.22 TBD ECOMMENT
* * 2021-10-25 00.59 TBD ECOMMENT
* 2021-10-25 00.54 COMMENT - WRITTEN ECOMMENT
* 2021-10-25 00.52 COMMENT - WRITTEN ECOMMENT
* 2021-10-25 00.50 COMMENT - WRITTEN ECOMMENT

Protestant Comments

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Documents

FileName
☐ Garbage Processing Facility Proposed Location.docx

Prev | Next | Save | Cancel | Print

REVIEWED
NOV 03 2021
By GCW

MSW
129147

Garbage Processing Facility Proposed Location

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

REVIEWED

NOV 03 2021

By GCW

MSW
125147

CID Interested Person Detail

Interested Person

Number 245526 Request Received Date 10/25/2021 Last Polling Date [ ] Legislator

Comment

Individual

Concerned Citizen Last Name FOSTER Suffix [ ] Prefix [ ] First Name LORY

Middle Name LEE Title [ ]

Organization [ ] More

Address

Building/Mail Drop [ ] Interagency Valid

Detail

Street/PO Box 3894 FOSTER DR

City CAMPBELL State TX Zip 75422 - 3332

Country UNITED STATES Foreign Postal Code More

Phone Number/Email ID

Phone

Country Code [ ] Area Code 903 Number 4614460 Extension [ ] Updated 10/25/2021

Fax

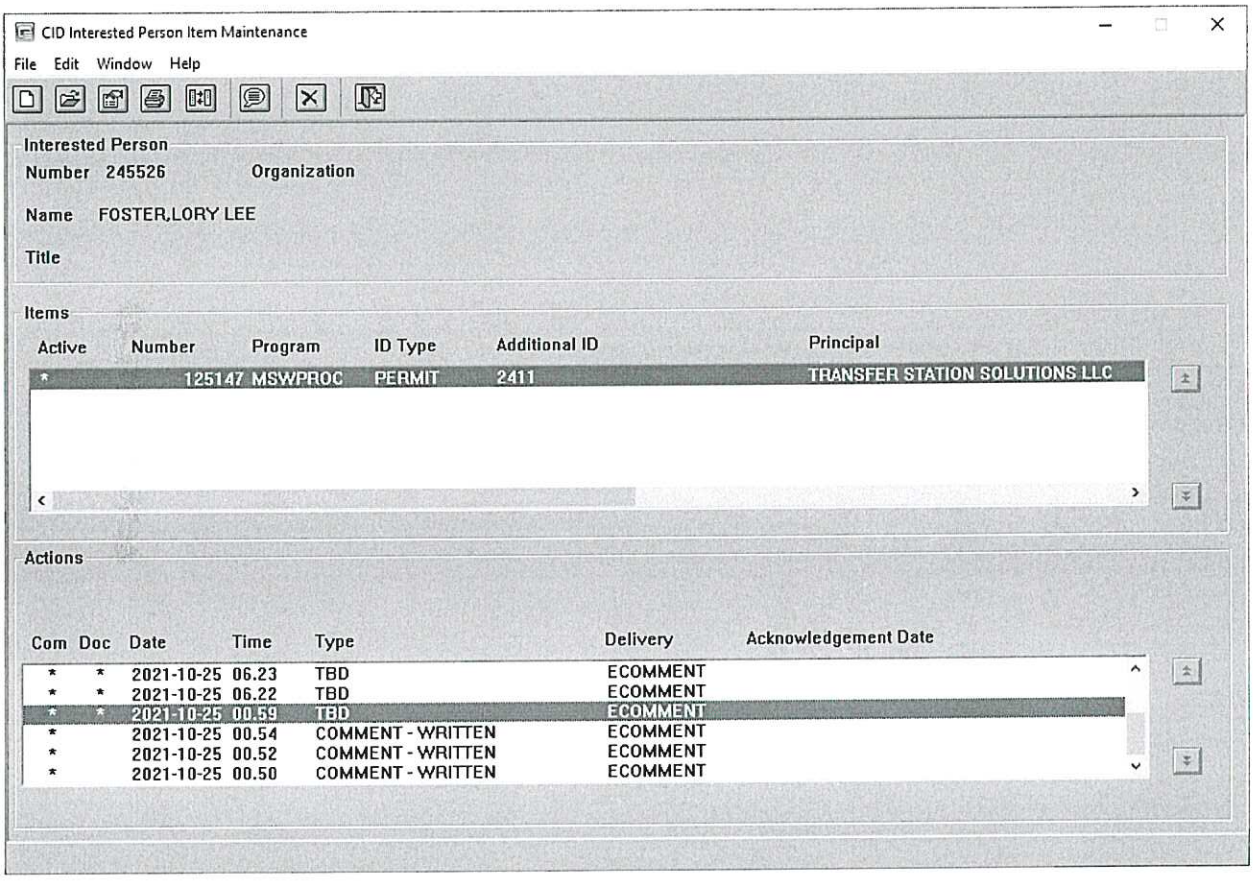
Country Code [ ] Area Code [ ] Number [ ] Extension [ ] Updated

Email ID

foster1027@gmail.com Updated 10/25/2021

Additional IDs | Counties | Principals | Regulated Entities | Items

Save | Clear | Cancel | Print


CID Interested Person Item Maintenance
File Edit Window Help
Interested Person
Number 245526 Organization
Name FOSTER,LORY LEE
Title
Items
Active Number Program ID Type Additional ID Principal
* 125147 MSWPROC PERMIT 2411 TRANSFER STATION SOLUTIONS LLC
Actions
Com Doc Date Time Type Delivery Acknowledgement Date
* * 2021-10-25 06.23 TBD ECOMMENT
* * 2021-10-25 06.22 TBD ECOMMENT
* * 2021-10-25 00.59 TBD ECOMMENT
* 2021-10-25 00.54 COMMENT - WRITTEN ECOMMENT
* 2021-10-25 00.52 COMMENT - WRITTEN ECOMMENT
* 2021-10-25 00.50 COMMENT - WRITTEN ECOMMENT

Protestant Comments

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Documents

FileName
☐ Garbage Processing Facility Proposed Location.docx

Prev | Next | Save | Cancel | Print

REVIEWED
NOV 03 2021
By GCW

MSW
125147

Garbage Processing Facility Proposed Location

We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 1, 2021 10:52 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: bixlucky@yahoo.com <bixlucky@yahoo.com>
Sent: Saturday, October 30, 2021 11:00 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Bickley Dave

E-MAIL: bixlucky@yahoo.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034131172

FAX:

COMMENTS: I am completely against the transfer facility proposal at this location. It would contribute to an increase in truck traffic on Hwy 24 which is already congested in the early morning hours with trash trucks coming from Maloy landfill. These trucks present a danger to other drivers since they come out in a convoy and have little regard for the safety of other drivers. This facility would also negatively affect our local environment by polluting the ground and would decrease property values around it

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 1, 2021 10:51 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Jecb64@yahoo.com <Jecb64@yahoo.com>
Sent: Saturday, October 30, 2021 11:15 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Janice Bickley

E-MAIL: Jecb64@yahoo.com

COMPANY:

ADDRESS: 5487 LOOP 178
COMMERCE TX 75428-6451

PHONE: 9034744120

FAX:

COMMENTS: No! This might seem like a good place to dump your trash-but this is our home-our towns -our community. This is where we raise our kids & grow our gardens.You will not only ruin our soil with toxic waste & chemicals-but there will undoubtably be a constant smell! You will ruin the value of homes & property. Plus the trucks hauling this filth will cause more congestion to this road which is already a main thoroughfare for Malloy landfill-please take your trash somewhere else! Respect our right to say no!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 1, 2021 10:49 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: Cruzaw@yahoo.com <Cruzaw@yahoo.com>
Sent: Saturday, October 30, 2021 1:13 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Armando Delacruz

E-MAIL: Cruzaw@yahoo.com

COMPANY:

ADDRESS: 5657 COUNTY ROAD 4317
CAMPBELL TX 75422-1863

PHONE: 3614556378

FAX:

COMMENTS: This compacting station would sit less than 500 yards from the front door of my house. The amount of loose trash and seepage into the ground are a few of the many negatives this facility can bring to myself and the neighboring homes. We have cattle and stock ponds which would be completely devastated by ingestion of plastics and trash picked up by the wind that we see daily. I strongly vote against such a facility to be placed in this location.

Lori Rowe

From:	PUBCOMMENT-OCC
Sent:	Monday, November 1, 2021 10:36 AM
To:	PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject:	FW: Public comment on Permit Number 2411

From: KellyKKK@mail.com <KellyKKK@mail.com>
Sent: Sunday, October 31, 2021 1:42 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Kelly Kuehl

E-MAIL: KellyKKK@mail.com

COMPANY:

ADDRESS: 5915 COUNTY ROAD 4710
COMMERCE TX 75428-5941

PHONE: 4693967267

FAX:

COMMENTS: I live in the area & find this proposed trash "transfer" facility a thoroughly toxic proposed use of land in this rural area. EVERY resident in the immediate & surrounding area will be adversely effected. Property values will drastically decline and taxes will go up. Any transportation of up to 2 MILLION pounds of garbage per DAY WILL result in: - - Untimely & premature damage / destruction of the roads/highway to the facility, due to the massive increase of heavy laden trucks, leading to increase in local taxes to repair/resurface them. - - Storing up to 2 MILLION pounds of

garbage a day & covering with a "tarp" means that the garbage WILL smell, WILL be scattered all around to the neighboring properties, WILL attract rats, opossum, raccoon, flies, bots, beetle & all other types of scavengers which will, in turn, infest local property for miles around with disease & increased pest population. - - Once "processed" the toxic liquid dumped or that may accidentally "escape" capture WILL go into the ground & will pollute not only the soil at the site, ground water, local creeks & streams but will eventually make its way into private property livestock ponds, the higher substrate aquifers, thus destroying private property soil, damaging it & making it potentially unrecoverable for growing crops or grazing livestock. - - I find the thoroughly dishonest & deceptive "naming" of this venture as a "Transfer Station" to be despicable - the name implies that all the garbage of 50 or so OTHER communities will simply be brought into the facility, TRANSFERRED into other trucks and then moved out. When, in TRUTH, it will not be simply "transferred", but WILL, in fact, be DUMPED, PROCESSED - rendering the site & all the surrounding area to deal with ALL the gross smell, rodents, disease infested scavengers, toxins & pollutants to THIS community the same as if it were a "destination" garbage dump, receiving & processing up to TWO MILLIONS POUNDS per DAY. - - So the honest naming of this proposal would be "Establishing a NEW GARBAGE DUMP for 50 OTHER cities & towns in MY backyard" I oppose this in the most vehement possible manner.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, October 25, 2021 11:18 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: michelledbabb@gmail.com <michelledbabb@gmail.com>
Sent: Friday, October 22, 2021 5:39 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Michelle Babb

E-MAIL: michelledbabb@gmail.com

COMPANY:

ADDRESS: PO BOX 178
CAMPBELL TX 75422-0178

PHONE: 2102324433

FAX:

COMMENTS: The proposed location is awfully close to the Sulfur River. Have the appropriate studies been conducted on the potential impact to the Sulphur River, wildlife and neighboring livestock been conducted?

00343

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, October 25, 2021 11:18 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: michelledbabb@gmail.com <michelledbabb@gmail.com>
Sent: Friday, October 22, 2021 6:46 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Michelle Babb

E-MAIL: michelledbabb@gmail.com

COMPANY:

ADDRESS: PO BOX 178
CAMPBELL TX 75422-0178

PHONE: 2102324433

FAX:

COMMENTS: The proposed location is awfully close to the Sulfur River. Have the appropriate studies been conducted on the potential impact to the Sulphur River, wildlife and neighboring livestock been conducted?

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, October 25, 2021 11:16 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: cbreche@yahoo.com <cbreche@yahoo.com>
Sent: Saturday, October 23, 2021 4:28 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Christopher Jeremy Brecheisen

E-MAIL: cbreche@yahoo.com

COMPANY: Brecheisen Farm

ADDRESS: 1686 COUNTY ROAD 4208
CAMPBELL TX 75422-1766

PHONE: 9035136875

FAX:

COMMENTS: After retiring from the USAF back in 2015, my wife and I decided to return to North Texas and purchase a home in Campbell, TX, where we've also run an organic practice small farm operation for the past six years. If this toxic facility had been in place on highway 24 back in 2015, we would have never chosen to live anywhere near it, and quite possibly neither will future potential residents (thus driving down the property values for all in the local area). This facility poses a potential threat to our community's well water supply, a potential increase in auto accidents on highway

24 (increase in large trash trucks turning on a 75 mph four lane highway), a visual nuisance and environmental threat to the Texas A&M University-Commerce's agricultural property, and finally, a loss of property value to everyone that lives in the local area. Allowing this to move forward will give our small Campbell, TX community the reputation of being a trash city.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, October 25, 2021 11:13 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: tmoore@peoplescom.net <tmoore@peoplescom.net>
Sent: Monday, October 25, 2021 9:59 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jessie Moore

E-MAIL: tmoore@peoplescom.net

COMPANY:

ADDRESS: 4635 FM 2736
CAMPBELL TX 75422-1273

PHONE: 9038623407

FAX:

COMMENTS: I have a few questions, please. If 2,000,000 pounds of trash are anticipated each day and if a trash truck carries approximately 30,000 pounds of trash per load, that would be 66.66 trash trucks per day making a round trip in addition to the additional trucks carrying the compacted trash to the Blossom facility. 1. Which towns have contracts and what roads will be utilized to bring the trash to the location? 2. How many trash trucks per day are anticipated from each town? 3. What is the anticipated accelerated wear and tear on the roads due to the heavy trucks? 4. Who will be

00347

picking up the extra blown-out trash litter from the roads? 5. What provisions will be made to ensure that absolutely no trash leaves the compactor to litter the site or surrounding properties? 6. What will be done with the extracted liquid? 7. Will this facility smell bad? 8. What is the noise level of the compactor and its days and hours of operation? 9. What are the operating requirements for the site and who will be responsible for inspecting it? 10. How much compacted trash will be allowed to accumulate at the site? 11. If the trash is going to Blossom, Texas for disposal and the trash needs to be compacted, why not have the compactor at the already approved Blossom location? 12. Why don't the cities compact their own trash prior to transporting?

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, October 25, 2021 4:47 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: speedo@peoplescom.net <speedo@peoplescom.net>
Sent: Monday, October 25, 2021 3:51 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: TX

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Roy Lee Smalley

E-MAIL: speedo@peoplescom.net

COMPANY:

ADDRESS: 2324 Highway 24
Campbell TX 75422

PHONE: 9727426618

FAX:

COMMENTS: Absolutely opposed due to the inevitable odor, appearance for any type of waste disposal or transfer. Our property value as well as all those along HW 24 will be directly,negatively affected. Directly adjacent to HW 24 has absolutely no benefit other than to the depositor.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, October 25, 2021 4:47 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: dgiles@gilesgroup.net <dgiles@gilesgroup.net>
Sent: Monday, October 25, 2021 3:51 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Dave Giles

E-MAIL: dgiles@gilesgroup.net

COMPANY: Rancho Giles

ADDRESS: 3714 STATE HIGHWAY 24
CAMPBELL TX 75422-1294

PHONE: 8173662026

FAX:

COMMENTS: I am extremely concerned about this proposed project. The proposed site is located adjacent to to highway with a posted 75 mph speed limit. The increased volume of large, garbage trucks turning across multiple lanes of traffic is extremely problematic and possibly tragic. In addition, the size and scope of the proposed project poses risks to the quality of life of the established neighborhood. This is especially true of surrounding landowners who are totally dependent upon their wells for their drinking water. The permit applicant's proposal is inadequate and permits rats,

hogs and other varmints to have unfettered access to millions of pounds of garbage each night. Finally, the proposed project diminishes the value of the surrounding properties. For example, my property has been in our family for over a hundred years and this person is proposing to move garbage from surrounding communities into our home area to compress it so that he can then haul the compressed garbage to Blossom, Texas.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, October 25, 2021 3:28 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: foster1027@gmail.com <foster1027@gmail.com>
Sent: Monday, October 25, 2021 3:24 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Lory Foster

E-MAIL: foster1027@gmail.com

COMPANY:

ADDRESS: 3894 FOSTER DR
CAMPBELL TX 75422-3332

PHONE: 9034614460

FAX:

COMMENTS: We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24.

Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 26, 2021 11:28 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: foster1027@gmail.com <foster1027@gmail.com>
Sent: Tuesday, October 26, 2021 6:30 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Lory Foster

E-MAIL: foster1027@gmail.com

COMPANY:

ADDRESS: 3894 FOSTER DR
CAMPBELL TX 75422-3332

PHONE: 9034614460

FAX:

COMMENTS: We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24.

Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 26, 2021 11:27 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: foster1027@gmail.com <foster1027@gmail.com>
Sent: Tuesday, October 26, 2021 6:30 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Lory Foster

E-MAIL: foster1027@gmail.com

COMPANY:

ADDRESS: 3894 FOSTER DR
CAMPBELL TX 75422-3332

PHONE: 9034614460

FAX:

COMMENTS: We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day, you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24.

Third. many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 26, 2021 11:02 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: foster1027@gmail.com <foster1027@gmail.com>
Sent: Tuesday, October 26, 2021 6:30 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Lory Foster

E-MAIL: foster1027@gmail.com

COMPANY:

ADDRESS: 3894 FOSTER DR
CAMPBELL TX 75422-3332

PHONE: 9034614460

FAX:

COMMENTS: We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third.

many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 26, 2021 11:00 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: foster1027@gmail.com <foster1027@gmail.com>
Sent: Tuesday, October 26, 2021 6:30 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Lory Foster

E-MAIL: foster1027@gmail.com

COMPANY:

ADDRESS: 3894 FOSTER DR
CAMPBELL TX 75422-3332

PHONE: 9034614460

FAX:

COMMENTS: We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summers day you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third.

many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 26, 2021 10:58 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: foster1027@gmail.com <foster1027@gmail.com>
Sent: Tuesday, October 26, 2021 6:30 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Lory Lee Foster

E-MAIL: foster1027@gmail.com

COMPANY:

ADDRESS: 3894 FOSTER DR
CAMPBELL TX 75422-3332

PHONE: 9034614460

FAX:

COMMENTS: We have lived here for over 40 years. Upon hearing of the proposed trash processing facility site being considered off of highway 24 south of Commerce Tx left us with many concerns. First, we already have a dump site south of Commerce. On a hot summer's day you can smell it for miles. Second, Highway 24 is bad enough with accidents without the additional traffic of garbage trucks turning off and on of the highway. The possibility of up to 1000 tons of garbage being processed daily would add a significant number of large trucks turning on and off of highway 24. Third.

many of the residents in the area drink from well water. The leaching of toxins into the water table. This will affect us and future generations living here. Forth, Commerce is just starting to grow a little again. The college is growing and new business are moving in. This facility will impact the future growth of the area. Who wants to smell or live near a garbage treatment facility.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, October 27, 2021 9:22 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: janetgayleanderson43@gmail.com <janetgayleanderson43@gmail.com>
Sent: Tuesday, October 26, 2021 7:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Janet Gayle Anderson

E-MAIL: janetgayleanderson43@gmail.com

COMPANY:

ADDRESS: 5993 SAND HILLS DR
CAMPBELL TX 75422-1841

PHONE: 9038864867

FAX:

COMMENTS: This does not sound like a good thing for our area. Will there be smell associated with this? What about traffic? Very concerned about this.

Lori Rowe

From:	PUBCOMMENT-OCC
Sent:	Wednesday, October 27, 2021 1:08 PM
To:	PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject:	FW: Public comment on Permit Number 2411

From: brabe0608@gmail.com <brabe0608@gmail.com>
Sent: Wednesday, October 27, 2021 11:50 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Brad Rabe

E-MAIL: brabe0608@gmail.com

COMPANY:

ADDRESS: 4076 MEADOWVIEW DR
CAMPBELL TX 75422-1872

PHONE: 2146413415

FAX:

COMMENTS: Trash Dump I protest the approval of this application Permit 2411 for numerous reasons. Environmental concerns are a big issue which can be hazardous to the wild life and residents surrounding the site. This location is in a residential area where nicer homes are located and will greatly depreciate the value of these and other surrounding properties. The entrance to this proposed site is located on busy Highway 24 and in a blind curve when driving North which could cause accidents with heavy trucks entering and exiting the site

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, October 27, 2021 1:07 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: joanlambert@icloud.com <joanlambert@icloud.com>
Sent: Wednesday, October 27, 2021 12:00 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Joan Lambert

E-MAIL: joanlambert@icloud.com

COMPANY:

ADDRESS: 2013 COUNTY ROAD 4312
CAMPBELL TX 75422-2211

PHONE: 9034564683

FAX:

COMMENTS: We own property at 2013 and 2057 CR 4312 Campbell Texas . This not something we want near our property or on the highway leading into Commerce. 2 sided covered with a tarp? The trash and animals will be awful as well as the wear snd tear on our roads. Please do not allow this to become a reality

Lori Rowe

From:	PUBCOMMENT-OCC
Sent:	Monday, October 11, 2021 1:22 PM
To:	PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject:	FW: Public comment on Permit Number 2411
Attachments:	WL47430-HUNT-TransferStationSolutionsC10-11-2021.pdf

MSW
125147

From: karen.hardin@tpwd.texas.gov <karen.hardin@tpwd.texas.gov>
Sent: Monday, October 11, 2021 12:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Karen B Hardin

E-MAIL: karen.hardin@tpwd.texas.gov

COMPANY: Texas Parks and Wildlife Department

ADDRESS: 4200 SMITH SCHOOL RD
AUSTIN TX 78744-3218

PHONE: 9033225001

FAX:

COMMENTS: See attached pdf

TEXAS PARKS & WILDLIFE

Life's better outside.®

Commissioners

Arch "Beaver" Aplin, III
Chairman
Lake Jackson

Dick Scott
Vice-Chairman
Wimberley

James E. Abell
Kilgore

Oliver J. Bell
Cleveland

Paul L. Foster
El Paso

Anna B. Galo
Laredo

Jeffery D. Hildebrand
Houston

Robert L. "Bobby" Patton, Jr.
Fort Worth

Travis B. "Blake" Rowling
Dallas

Lee M. Bass
Chairman-Emeritus
Fort Worth

T. Dan Friedkin
Chairman-Emeritus
Houston

Carter P. Smith
Executive Director

October 11, 2021

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

RE: Transfer Station Solutions, LLC Proposed Type V Municipal Solid Waste Transfer Station, Proposed TCEQ Permit No. 2411
Hunt County

Dear Office of the Chief Clerk:

Texas Parks and Wildlife Department (TPWD) has reviewed the proposed permit application for Transfer Station Solutions, LLC proposed Type V Municipal Solid Waste Transfer Station in Hunt County, Texas Commission on Environmental Quality (TCEQ) Proposed Permit No. 2411.

Please be aware that a written response to a TPWD recommendation or informational comment received by a state governmental agency may be required by state law. For further guidance, see Texas Parks and Wildlife Code (PWC) section 12.0011. Please refer to TPWD project number 47430 in return correspondence regarding this project.

Project Description

Transfer Station Solutions, LLC proposes construction of a new-location transfer station on a 5.9-acre tract located approximately four miles north of Campbell, Texas, at 3491 State Highway 24. The project will involve constructing a paved access road, a 120-foot by 120-foot transfer building, scale house, office/breakroom, water tank, contaminated water holding tank, drainage features, and perimeter fencing.

TPWD Review

As the state agency with primary responsibility for protecting the state's fish and wildlife resources, in accordance with the authority granted by Texas Parks and Wildlife Code (PWC) section 12.0011, TPWD provides the following comments and recommendations to minimize potential adverse impacts to the state's fish and wildlife resources, including rare, threatened and endangered species, in association with the proposed project.

Federal Regulations - Migratory Bird Treaty Act (MBTA)

The MBTA prohibits direct and affirmative purposeful actions that reduce migratory birds, their eggs, or their nests, by killing or capturing, to human control, except when specifically authorized by the Department of the Interior. This protection applies to most native bird species, including ground nesting species. The U.S. Fish and Wildlife

4200 SMITH SCHOOL ROAD
AUSTIN, TEXAS 78744-3291
512.389.4800
www.tpwd.texas.gov

Service Migratory Bird Office can be contacted at (505) 248-7882 for more information.

Within the project area, potential impacts to migratory birds may occur during disturbance of existing vegetation and bare ground that may harbor active bird nests, including nests that may occur in grass, shrubs and trees and on bare ground including gravel pads and roads.

> **Recommendation:** TPWD recommends excluding vegetation clearing activities during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If clearing vegetation during the migratory bird nesting season is unavoidable, TPWD recommends surveying the area proposed for disturbance to ensure that no nests with eggs or young will be disturbed by construction. If active nests are observed, TPWD recommends a 150-foot non-disturbance buffer until the eggs have hatched and the young have fledged.

The project is located within the Central Flyway, a major bird migration corridor that leads to the Texas coast and Central/South America. Artificial nighttime lighting and sky glow because of light pollution can have negative impacts on wildlife and ecosystems by disrupting natural diurnal and nocturnal behaviors such as migration, reproduction, nourishment, rest, and cover from predators.

> **Recommendation:** As bird protection measures, as well as protection for other wildlife, TPWD recommends designing the project's lighted structures, such as security lighting and exterior building lighting, to contain the minimum amount of permanent night-time lighting needed for safety and security. TPWD recommends minimizing the Project's contribution toward skyglow by focusing light downward, with full cutoff luminaries to avoid emitting light above the horizontal, and to use dark-sky friendly lighting that is illuminated only when needed, down-shielded, as bright as needed, and minimizes blue light emissions. Lighting technologies, BMPs, and other dark sky resources can be found at the International Dark-Sky Association and McDonald Observatory websites.

Federal Regulations: Clean Water Act (CWA)

Section 404 of the Clean Water Act establishes a federal program to regulate the discharge of dredge and fill material into the waters of the U.S., including wetlands. The United States Army Corps of Engineers (USACE) and the Environmental Protection Agency (EPA) are responsible for regulating water resources under this act. Although isolated wetlands and ephemeral streams may not be applicable to the USACE permitting process, both jurisdictional and non-jurisdictional waters play an essential role in providing habitat for wildlife and helping to protect water quality.

According to the Protected Species Habitat Assessment (PSHA) conducted by Integrated Environmental Solutions, LLC (IES) of Appendix I/II-B of the Supplementary Technical Report, no wetlands were identified on site. The South Sulphur River Tributary No. 9 crosses under an existing access road through two 42-inch diameter corrugated metal pipes that will be extended. The existing access road

will be upgraded from an unpaved road to a paved road. The tributary is considered ephemeral or intermittent in the IES PSHA.

Recommendation: TPWD recommends avoiding development within streams and wetlands. If the proposed project would have unavoidable impacts to waterways or associated wetlands, TPWD recommends consulting with the Regulatory Branch of the Fort Worth District of the USACE at (817) 886-1731 pursuant to the CWA, including permitting, jurisdictional determinations, delineations, and mitigation.

Recommendation: Waterways, floodplains, riparian corridors, lakes, and wetlands provide valuable wildlife habitat, and TPWD recommends protecting them to the maximum extent possible. TPWD recommends establishing disturbance-free buffers contiguous to wetlands or aquatic systems to preserve wildlife cover, food sources, and travel corridors. TPWD recommends utilizing buffer sizes that mimic existing wooded corridor at the project site with minimum buffers of 25 feet from ephemeral stream banks, 50 feet from intermittent stream banks, and 100 feet from perennial stream banks. If natural buffers greater than the minimum buffer distances have already been established by past land use practices, then TPWD recommends using the larger existing buffers. TPWD also recommends minimizing impacts to ephemeral streams, regardless of Section 404 jurisdictional status, because ephemeral streams are important in stream ecosystems.

State Regulations – Chapter 64, Birds

PWC section 64.002, regarding protection of nongame birds, provides that no person may catch, kill, injure, pursue, or possess a bird that is not a game bird. PWC section 64.003, regarding destroying nests or eggs, provides that, no person may destroy or take the nests, eggs, or young and any wild game bird, wild bird, or wild fowl. Chapter 64 does not allow for incidental take and therefore is more restrictive than the MBTA.

Recommendation: To minimize potential impacts to avian species, please review the *Migratory Bird Treaty Act* section above for recommendations as they are also applicable for compliance with PWC.

State Regulations - Aquatic Resources

PWC section 1.011 grants TPWD authority to regulate and conserve aquatic animal life of public waters. Section 57.157 of Texas Administrative Code (TAC) Title 31 regulates take of mussels, including mussels that are not state-listed threatened.

PWC sections 12.015, 12.019, 66.015 and TAC 52.101-52.105, 52.202, and 57.251-57.259 regulate the introduction and stocking of fish, shellfish, and aquatic plants into public waters of the state. Dewatering activities can impact aquatic resources through stranding fish and mussels. Other harmful construction activities can trample, dredge or fill areas exhibiting stationary aquatic resources such as plants and mussels. Relocating aquatic life to an area of suitable habitat outside the project footprint avoids or reduces impacts to aquatic life. Relocation activities are done under the authority of a TPWD *Permit to Introduce Fish, Shellfish or Aquatic Plants into Public Waters* to

ensure that natural resource risks associated with relocation area alleviated. ARRPs dictate resource handling activities, assist in the permitting process, and are coordinated through the TPWD KAST. If dewatering activities and other project-related activities cause mortality to fish and wildlife species, then the responsible party would be subject to investigation by the TPWD KAST and will be liable for the value of the lost resources under the authority of PWC sections 12.0011 (b) (1) and 12.301.

For project activities that would occur within streams, dewatering, stranding, or smothering of aquatic resources may be subject to TPWD authority and should be coordinated with TPWD KAST for appropriate authorization in the relocation of aquatic resources and to ensure protection of native aquatic wildlife. Impact avoidance measures for aquatic organisms, including **all** native freshwater mussel and fish species, regardless of state-listing status, should be considered during project planning and construction activities.

Recommendation: If construction occurs during times when water is present in streams and dewatering activities or other harmful construction activities are involved (such as placement of temporary or permanent fills or structures), then TPWD recommends relocating potentially-impacted native aquatic resources (fish and mussels) in conjunction with a *Permit to Introduce Fish, Shellfish or Aquatic Plants into Public Waters* and an ARRP. The ARRP should be completed and approved by the department **30 days prior to activity within project waters and/or resource relocation** and submitted with an application for a no-cost *Permit to Introduce Fish, Shellfish, or Aquatic Plants into Public Waters.* ARRPs can be submitted to Bregan Brown, TPWD Region 2 KAST at Kirian.Brown@tpwd.texas.gov and 903-566-2518.

Recommendation: TPWD recommends utilizing construction methodologies and beneficial management practices (BMPs) to avoid or minimize adverse impacts to aquatic resources, such as using trenchless stream crossing technology, employing sediment controls, crossing streams when they are dry, narrowing the width of disturbance through riparian areas, and using mats to protect ground vegetation and roots from construction equipment. TPWD recommends avoiding disturbance to inert microhabitats in waterways such as snags, brush piles, fallen logs, creek banks, pools, and gravel stream bottoms, as these provide habitat for a variety of fish and wildlife species and their food sources. Erosion control measures should be installed prior to construction and maintained until disturbed areas are permanently revegetated using site-specific native vegetation.

State Regulations - Aquatic Invasive Species

Per TAC Title 31, Part 2, Chapter 57, Subchapter A, it is an offense for any person to possess, transport, or release into the water of this state any species, hybrid of a species, subspecies, eggs, seeds, or any part of any species defined as a harmful or potentially harmful exotic fish, shellfish, or aquatic plant. This rule applies not only to zebra mussels (*Dreissena polymorpha*) (live or dead) and their larvae but also to any species (or fragments thereof) designated as harmful or potentially harmful under this subchapter (e.g., giant salvinia, hydrilla, Eurasian watermilfoil). The list of prohibited species can be found on the TPWD website regarding prohibited aquatic species.

The proposed construction will require equipment to come in contact with inland water bodies where culvert extensions are proposed. Unwashed equipment entering the site could contain contaminated mud, debris or standing water in crevices and are a risk of transporting aquatic invasive species to the site, especially if the equipment is coming from a previous job that involved work in other water bodies. Additionally, equipment leaving the construction site at the end of the job could contain contaminated material if contaminants are unknowingly present at the project site.

Recommendation: When working in inland waters, TPWD recommends following an aquatic invasive species (AIS) transfer prevention plan which outlines BMPs for preventing inadvertent transfer of aquatic invasive plants and animals on project equipment. To minimize the risk of transporting aquatic invasive plant or animal species on construction equipment and materials, TPWD recommends Transfer Solutions, LLC and its contractors review and adhere to the AIS BMPs identified in the *TPWD Guidelines for Aquatic Resource Relocation Plans* and the *TPWD Clean/Drain/Dry Procedures and Zebra Mussel Decontamination Procedures for Contractors Working in Inland Public Waters*.

Species of Greatest Conservation Need

The IES PSHA indicates that no suitable habitat for federal or state-listed species occurs within the project site. In addition to federal- and state-threatened and endangered species, TPWD tracks SGCN and actively promotes their conservation. TPWD considers it important to evaluate and, if feasible, minimize impacts to SGCN and their habitat to reduce the likelihood of endangerment and preclude the need to list as threatened or endangered in the future.

The permit application and IES PSHA did not include an accounting of potential SGCN that may occur within the project site. The IES PSHA indicates that the 5.9- acre tract consists of forested, grassland, and urban/disturbed land cover. The IES PSHA indicates the grassland vegetation community consists of native prairie vegetation dominated by little bluestem (*Schizachyrium scoparium*), silver bluestem (*Bothriochloa laguroides*), field brome (*Bromus arvensis*), meadow dropseed (*Sporobolus asper*), and white tridens (*Tridens albescens*), and an area of fenceline woodlands consist of sugarberry (*Celtis laevigata*), American elm (*Ulmus americana*), cedar elm (*Ulmus crassifolia*), post oak (*Quercus stellata*), water oak (*Quercus nigra*), and eastern redcedar (*Juniperus virginiana*).

TPWD review of the RTEST list for Hunt County and publicly available resources indicates that the following SGCN have potential to occur within or near the project area based on suitable stream, fenceline woodland, and undeveloped prairie grassland habitats in the project area.

Taxon	SName	CName	GRank	SRank
Amphibians	Anaxyrus woodhousii	Woodhouse's toad	G5	SU
Amphibians	Pseudacris streckeri	Strecker's chorus frog	G5	S3

Amphibians	Lithobates areolatus areolatus	southern crawfish frog	G4T4	S3
Birds	Athene cunicularia hypugaea	western burrowing owl	G4T4	S2
Mammals	Mustela frenata	long-tailed weasel	G5	S5
Mammals	Spilogale putorius	eastern spotted skunk	G4	S1S3
Mammals	Puma concolor	mountain lion	G5	S2S3
Reptiles	Deirochelys reticularia miaria	western chicken turtle	G5T5	S2S3
Reptiles	Terrapene carolina	eastern box turtle	G5	S3
Reptiles	Terrapene ornata	western box turtle	G5	S3
Reptiles	Ophisaurus attenuatus	slender glass lizard	G5	S3
Reptiles	Plestiodon septentrionalis	Prairie Skink	G5	S5
Reptiles	Cemophora coccinea	northern scarlet snake	G5	S4
Crustaceans	Procambarus steigmani	Parkhill Prairie crayfish	G1G2	S1S2
Insects	Bombus pensylvanicus	American bumblebee	G3G4	SNR
Insects	Lintneria eremitoides	sage sphinx moth	G2	S1?
Plants	Echinacea atrorubens	Topeka purple-coneflower	G3	S3
Plants	Crataegus viridis var. glabriuscula	Sutherland hawthorn	G5T3T4	S3
Plants	Calopogon oklahomensis	Oklahoma grass pink	G2	S1S2

Recommendation: TPWD recommends that precautions be taken to avoid impacts to SGCN flora and fauna when planning the project and if encountered in the project area during construction, maintenance, or operation activities. TPWD also recommends the implementation of the following BMPs to avoid or minimize potential impacts to wildlife resources potentially occurring at the construction site:

1. TPWD recommends informing employees and contractors of the potential for state-listed threatened species or SGCN to occur in the project area. Contractors should be advised to avoid impacts to all wildlife that are encountered.

2. Small vertebrates including snakes, lizards, toads, and mice fall into trenches and become trapped. Wildlife unable to escape from trenches are susceptible to loss from backfilling activities, exposure to elements, starvation, dehydration, and predation by other wildlife. Where trenching is involved, TPWD recommends minimizing the length of trenches left open at any given time during construction. Trenches left open for more than two daylight hours should be inspected for the presence of trapped wildlife prior to backfilling. If trenches cannot be backfilled the day of initial trenching, then escape ramps, in the form of short lateral trenches

or wooden planks sloping to the surface at an angle of less than 45 degrees, should be installed at least every 90 meters.

3. For soil stabilization and revegetation of disturbed areas within the proposed project area, TPWD recommends erosion and seed/mulch stabilization materials that avoid entanglement hazards to snakes and other wildlife species. Because the mesh found in many erosion control blankets or mats pose an entanglement hazard to wildlife, TPWD recommends the use of no-till drilling, hydromulching and/or hydroseeding rather than erosion control blankets or mats due to a reduced risk to wildlife. If erosion control blankets or mats will be used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Because microplastic pollution is a concern for wildlife food chains, hydromulch containing plastic ingredients and plastic mesh matting should be avoided.

4. To aid in the scientific knowledge of a species' status and current range, TPWD encourages reporting encounters of SGCN, threatened, and endangered species to the Texas Natural Diversity Database (TXNDD) according to the data submittal instructions found on the TXNDD website. An alternative method for reporting observations of species is the iNaturalist community app in which plant and animal observations are uploaded from a smartphone. The observer then selects to add the observation to specific TPWD Texas Nature Tracker Projects appropriate for the taxa observed, including Herps of Texas, Birds of Texas, Texas Eagle Nests, Texas Whooper Watch, Mammals of Texas, Rare Plants of Texas, Bees & Wasps of Texas, Terrestrial Mollusks of Texas, Texas Freshwater Mussels, Fishes of Texas, and All Texas Nature.

The IES PSHA indicates that none of the vegetation observed would be considered unique or compose a unique vegetation type for the region. However, the project site includes native prairie habitat of the Texas Blackland Prairies ecoregion. Within the Texas Blackland Prairies ecoregion, priority habitats identified in the TCAP for conservation of SGCN for the project area include barrens, tallgrass prairie communities, slope forest/woodlands, riparian and bottomland woodlands, freshwater wetlands, seeps, springs, and savannahs and woodlands. Within the prairie regions, native grasslands have become lost due to agricultural practices, development, and woody encroachment, and are now considered unique and targeted for conservation. With the loss of native prairies, wildlife populations associated with grassland habitats have declined including the loss of pollinators due to declining floral resources.

Although the majority of prairie habitat has been lost in Hunt County, native prairie pockets do occur within the landscape, though their locations can be unknown because they occur on private properties that have not been surveyed or assessed. The IES PSHA indicates that native prairie habitat will be impacted by development of the project. The IES PSHA site assessment was conducted in January when most vegetation is dormant or not detectable, thus floral resources occurring at the site are unknown.

Recommendation: TPWD recommends minimizing disturbance or grading of the prairie vegetation at the site. To accrue benefits for native pollinators as well as other grassland flora and fauna, TPWD recommends native grassland and floral species conservation and restoration at the property. Where disturbance is necessary, TPWD recommends salvaging the topsoil of the prairie impact areas. TPWD recommends using the salvaged topsoil in places requiring revegetation. This will allow for existing native rhizome and seed stock to reestablish themselves naturally. The site plan indicates a 50-foot buffer around portions of the site. The buffer areas could serve as prairie habitat enhancement if the buffer area is naturally revegetated or planted with the same native species that were removed from the prairie areas. TPWD recommends avoiding non-native species such bermudagrass (*Cynodon dactylon*), KR bluestem (*Bothriochloa ischaemum*), or their varieties in seeding or revegetation plans.

TPWD appreciates the opportunity to provide input. Thank you for considering the fish and wildlife resources of Texas. If you have any questions, please contact me at Karen.Hardin@tpwd.texas.gov or (903) 322-5001.

Sincerely,

Karen B. Hardin
Wildlife Habitat Assessment Program
Wildlife Division

kbh/47430

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, October 14, 2021 12:18 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

PM

From: bstovall@huntcounty.net <bstovall@huntcounty.net>
Sent: Thursday, October 14, 2021 11:13 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: THE HONORABLE Bobby W. Stovall

E-MAIL: bstovall@huntcounty.net

COMPANY: Hunt County

ADDRESS: PO BOX 1097
GREENVILLE TX 75403-1097

PHONE: 9034084146

FAX:

COMMENTS: Due to the number of questions being asked by the public, as County Judge I believe it would be beneficial to have a public meeting. We are being asked questions that we don't have answers.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, October 14, 2021 12:18 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

PM

From: sharrison@huntcounty.net <sharrison@huntcounty.net>
Sent: Thursday, October 14, 2021 11:50 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: THE HONORABLE Steven M Harrison

E-MAIL: sharrison@huntcounty.net

COMPANY: Hunt County - County Commissioner, Pct. 4

ADDRESS: 2507 LEE ST Rm. 107
GREENVILLE TX 75401-4245

PHONE: 9034084195

FAX:

COMMENTS: I am the County Commissioner for the area of this permit. I am asking for TCEQ and Transfer Solutions to hold a public meeting/town hall type meeting to get the citizens and my questions answered. I have been contacted to by numerous citizens that are concerned and oppose this based off of the very little information that has been provided.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, October 15, 2021 8:50 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: darylfreelen@gmail.com <darylfreelen@gmail.com>
Sent: Thursday, October 14, 2021 2:55 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Daryl Wayne Freelen

E-MAIL: darylfreelen@gmail.com

COMPANY: N/A

ADDRESS: 5710 COUNTY ROAD 4317
CAMPBELL TX 75422-1859

PHONE: 9032430889

FAX:

COMMENTS: My property boundary is less than 60 meters from the boundary of this proposed waste transfer station. This station will be a hazard to health of my family. It will create horrible smells, lose debris and methane gasses. Our main waterline goes across this property and is now in jeopardy of being contaminated. Not only is this an environmental hazard but it will be such an eye sore and stink pit that it will drive the price of our property down such

that we will never be able to sell. The constant traffic from this station on highway 24 will create horrible road hazards, accidents and fatalities. Please do not allow the building of this terrible waste station in our community.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, October 15, 2021 4:50 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: beehorse51@yahoo.com <beehorse51@yahoo.com>
Sent: Friday, October 15, 2021 4:12 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: TX

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Janis Stroope

E-MAIL: beehorse51@yahoo.com

COMPANY:

ADDRESS: 2215 COUNTY ROAD 4208
CAMPBELL TX 75422-1775

PHONE: 9034564338

FAX:

COMMENTS: My issues/concerns: 1. Already have a landfill in Campbell less than 5 miles away. 2. This is a Memorial Highway for Chennault and the Flying Tigers! 3. Concerns about more trash on highway 4. Concerned about the trucks entering and exiting highway. Lots of young drivers on this road. 5. Property values are a concern. We own 500+ acres in this water shed 6. Water shed and traffic studies should be done if not already done. 7. Buzzards, Hawks, birds of prey

everywhere already. 7. Air Quality 8. This highway leads to the crown of the county...TAMUC with many foreign visitors daily. Anyway you look at it, trash truck traffic is not appealing!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, October 18, 2021 3:08 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: m2@lblueheron.wpengine.com <m2@lblueheron.wpengine.com>
Sent: Monday, October 18, 2021 2:59 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Barba Lane McCord

E-MAIL: m2@blueheronproperties.com

COMPANY:

ADDRESS: 5956 PRIVATE ROAD 4223
CAMPBELL TX 75422-1828

PHONE: 2148034663

FAX:

COMMENTS: We plead that you do not allow this waste transfer station at the proposed location; we've lived at this address for over 45 years. We do not want the smell, the traffic or the unsiteliness of this near us. It is also only four miles from our beloved university, Texas A&M Commerce. Highway 24 is the "Gate" to the university and this could do irreputable harm to our image. PLEASE, I IMPORE YOU TO NOT GRANT THIS PERMIT FOR THIS LOCATION!

00382

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 19, 2021 9:46 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: ralexander@cypressbanktx.com <ralexander@cypressbanktx.com>
Sent: Monday, October 18, 2021 3:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Robin Alexander

E-MAIL: ralexander@cypressbanktx.com

COMPANY: Cypress Bank

ADDRESS: 1702 LIVE OAK ST
COMMERCE TX 75428-2552

PHONE: 9038867425

FAX:

COMMENTS: We do not want this transfer station approved. There safety concerns to consider with truck traffic in this area. This road is a thoroughfare for students commuting to Texas A& M Commerce and it would not be good to have a trash transfer station along the roadside. I have been managing a bank in Commerce for 15 years and think this type of property would have a negative impact on the area. Please consider the collective of people asking you not to allow the transfer station in this location. Thank you, Robin Alexander Vice President Cypress Bank Commerce

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 19, 2021 9:45 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: danielclark1877@gmail.com <danielclark1877@gmail.com>
Sent: Monday, October 18, 2021 3:43 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MR Daniel A Clark

E-MAIL: danielclark1877@gmail.com

COMPANY:

ADDRESS: 2479 COUNTY ROAD 4312
CAMPBELL TX 75422-2210

PHONE: 9034505508

FAX:

COMMENTS: As a resident of Campbell, Texas who also lives in close proximity to the proposed transfer station, I am vehemently opposed to this application. The proposed location on Hwy 24 is the main entrance to Commerce and more specifically to TAMU-Commerce. TAMU-Commerce recently made the decision to become a NCAA Division I university. A solid waste transfer facility will detract not only from the university but also the property values of surrounding residences. There is an existing solid waste facility less than 5 miles from this proposed facility. Additionally the

Nacotoch Groundwater Aquifer lies within the proposed facilities area. I am the treasurer of the Maloy Water Supply corporation which supplies water to 210 customers in the immediate area of the proposed facility. Any contamination or accidental contamination would potentially impact the aquifer as a source of potable water. We ask that you take into consideration the comments of the residents who live in the area and deny this permit for the following reasons: Decreased property values Increase in heavy truck traffic in the area Unsightly facility and odors Similar facility within a close proximity to proposed site. Thanks, Daniel Clark Concerned Campbell Citizen

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, October 20, 2021 1:32 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: marymiller87@hotmail.com <marymiller87@hotmail.com>
Sent: Wednesday, October 20, 2021 9:42 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Mary Miller

E-MAIL: marymiller87@hotmail.com

COMPANY:

ADDRESS: 1712 COUNTY ROAD 4210
CAMPBELL TX 75422-1812

PHONE: 9038862314

FAX:

COMMENTS: I do not want the transfer station (Permit #2411) to be built. I believe that it will impact the quality of the air and the ground water. I also believe that the increased traffic on this highway would exceed what is safe for the existing residents.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, October 21, 2021 10:01 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: beatwallstreet903@gmail.com <beatwallstreet903@gmail.com>
Sent: Thursday, October 21, 2021 9:42 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Cody Helm

E-MAIL: beatwallstreet903@gmail.com

COMPANY:

ADDRESS: 958 STATE HIGHWAY 24
CAMPBELL TX 75422-1338

PHONE: 9035134570

FAX:

COMMENTS: This is not wanted in the Campbell TX area. Please do not approve if this. The effect it will have on the adjoining property is a factor to be considered. There is a golf course behind the proposed location. As well as a good number of nice homes. The residents of that area I have spoke with all are in agreement that this is nothing that want.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, October 21, 2021 9:32 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: alyssalogston@gmail.com <alyssalogston@gmail.com>
Sent: Wednesday, October 20, 2021 3:49 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: ALYSSA C LOGSTON

E-MAIL: alyssalogston@gmail.com

COMPANY:

ADDRESS: 1863 COUNTY ROAD 4109
CAMPBELL TX 75422-1207

PHONE: 2146766207

FAX:

COMMENTS: THERE IS ALREADY A DUMP WITHIN 10 MILES OF THIS! Who wants to move and grow a city full of dumps? This is next to several residences who will now have the daily smell of a dump. This may be ideal for taxes however you are putting out your residents! This will affect all of Campbell and Commerce. You are putting a dump right next to the golf course too, wonder how long they will still have golfers when its next to a dump.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, October 21, 2021 9:27 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: kstarks01@gmail.com <kstarks01@gmail.com>
Sent: Wednesday, October 20, 2021 10:03 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Karen Starks

E-MAIL: kstarks01@gmail.com

COMPANY:

ADDRESS: 2012 CREEKVIEW DR
COMMERCE TX 75428-3947

PHONE: 2143544507

FAX:

COMMENTS: This is unacceptable! People live right beside and behind this proposed mess. Where is all that putrid water going to go? Seep into everyone's well water in around around the facility? Or will it just run off into the South Sulphur river and ruin the entire eco system for hundreds of miles. No, just no! They need to find a place that is not around people's homes or near any water sources. Inappropriate location and I doubt you want to deal with lawsuits and the delays they will cause. Find another location, preferably near where they plan to take this crap to bury it! Why

on earth would you send 80-90 trucks a day over 50 miles to the dump. Makes no sense! We don't want the inevitable trash flying out of all those trucks in Campbell, Commerce or any other city on the route!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, October 21, 2021 9:26 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: mcbeane@hotmail.com <mcbeane@hotmail.com>
Sent: Wednesday, October 20, 2021 11:55 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Michael Beane

E-MAIL: mcbeane@hotmail.com

COMPANY:

ADDRESS: 2553 COUNTY ROAD 4312
CAMPBELL TX 75422-2308

PHONE: 9033669637

FAX:

COMMENTS: This project does not need to go forward on the main highway leading into a community. No one wants to come to a town that has trash dump visible as you are coming into town. The proximity to the Sulpher River, the water supply for Maloy Water and the City of Commerce also makes this project a concern. Commerce already has one Super Fund site and is know to have a very high rate of cancer cases due to this and there is a lot of speculation that the water supply isn't to the quality claimed. Also the traffic that this would cause would greatly outweigh the necessity. There are

already line of 18 wheelers and dump trucks lined up at this location almost every morning waiting to get into the sand pit adjacent to this property, not to mention the multitude of vehicle traffic going to the existing dump ground just a couple of mile down the road on FM 1568. You might also check with local wildlife offices about the whooping cranes often seen on and adjacent to this property.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, October 21, 2021 9:26 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: vickiemcmurray@gmail.com <vickiemcmurray@gmail.com>
Sent: Thursday, October 21, 2021 7:57 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Vickie McMurray

E-MAIL: vickiemcmurray@gmail.com

COMPANY:

ADDRESS: 1527 DEER TRL
COMMERCE TX 75428-3865

PHONE: 2143923196

FAX:

COMMENTS: Our community does not want this waste center anywhere near residential or viewed driving into Commerce. There is plenty of land away from the residential areas. Do NOT put this business in the proposed area.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, October 21, 2021 3:48 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: d11starks@gmail.com <d11starks@gmail.com>
Sent: Thursday, October 21, 2021 2:50 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Daniel Starks

E-MAIL: d11starks@gmail.com

COMPANY:

ADDRESS: 1215 1/2 WASHINGTON ST
COMMERCE TX 75428-2613

PHONE: 9034507809

FAX:

COMMENTS: Having this a trash transfer at this location would be a HUGE detriment to the Campbell/Commerce community. That is the main thoroughfare to get to Commerce, which has a soon-to-be D1 University. With the amount of trucks, trash, smell, etc. that would come from this location, it is horrifying to think of the amount of people that would not buy in this area because of it. The sand company that owns the land where this will placed is also an issue because of the amount of dust and sand that gets into nearby homes. Some families have even moved because of it. So

now we're adding trash to the mix? Please consider denying this request. If not for anything but it's proximity to homes and the health dangers that the homeowners could face because of it.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, October 22, 2021 10:13 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: fuzzy.vaughan@gmail.com <fuzzy.vaughan@gmail.com>
Sent: Thursday, October 21, 2021 9:25 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MS Cyrus Vaughan

E-MAIL: fuzzy.vaughan@gmail.com

COMPANY:

ADDRESS: 711 S HOUSTON ST UNIT 1
WOLFE CITY TX 75496-3567

PHONE: 9032172681

FAX:

COMMENTS: No. Just no. I work in Campbell and don't want to smell or see that. Hwy 24 had enough odors with many of the big trucks and dump trucks. We don't need more trucks. Besides, it leaves a sink, not matter what you do. I used to drive by the landfill in the Princeton area and it Sinks 24/7. Please do not approve this permit.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, October 22, 2021 10:11 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: aknutson80@gmail.com <aknutson80@gmail.com>
Sent: Friday, October 22, 2021 7:50 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Anna Knutson

E-MAIL: aknutson80@gmail.com

COMPANY:

ADDRESS: 1505 DEER TRL
COMMERCE TX 75428-3865

PHONE: 9034562487

FAX:

COMMENTS: This facility will impact many families and their homes and is on the major highway leading to our town. We are trying to attract new residents and businesses to our small community and this will not make a good first impression. Traffic is already bad right there due to a sand pit and the trucks the enter and exit there. I am not against a new business in the area but the location is horrible. Please do not approve this.

Lori Rowe

From:	PUBCOMMENT-OCC
Sent:	Friday, October 22, 2021 3:53 PM
To:	PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Cc:	Laurie Gharis; Deornette Monteleone
Subject:	FW: Public comment on Permit Number 2411
Attachments:	Rep. Slaton - Request For Public Meeting_App_No_2411.pdf

PM

From: bryan.slaton@house.texas.gov <bryan.slaton@house.texas.gov>
Sent: Friday, October 22, 2021 2:54 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Bryan Slaton

E-MAIL: bryan.slaton@house.texas.gov

COMPANY:

ADDRESS: 1213 CEDAR COVE PL
ROYSE CITY TX 75189-8129

PHONE: 4695852686

FAX:

COMMENTS: It has come to my attention that Transfer Station Solutions, LLC has submitted an application for a Type V Municipal Solid Waste Facility in Hunt County, Texas. After discussing the issue with several constituents who live and work in the immediate and surrounding area, I am opposed to this facility being constructed in the proposed area.

Furthermore, as a Texas State Legislator who represents Hunt County, where the proposed facility is to be built, I am requesting that a public meeting be held so that the public may address and question the applicant and the State. I am further requesting that every effort and action be taken to ensure that the public meeting is held in-person, rather than virtually. Please see the attached letter requesting a public meeting.

TEXAS HOUSE OF REPRESENTATIVES
BRYAN SLATON
District 2

October 22, 2021

Office of the Chief Clerk, MC 105
TCEQ
PO Box 13087
Austin TX 78711-3087

RE: REQUEST FOR PUBLIC MEETING FOR PERMIT APPLICATION NO. 2411

To the Office of the Chief Clerk,

It has come to my attention that Transfer Station Solutions, LLC has submitted an application for a Type V Municipal Solid Waste Facility in Hunt County, Texas. The permit application number is 2411.

As a Texas State Legislator who represents Hunt County, where the proposed facility is to be built, I am requesting that a public meeting be held so that the public may address and question the applicant and the State. I am further requesting that every effort and action be taken to ensure that the public meeting is held in-person, rather than virtually.

If you have any questions, please do not hesitate to reach out.

Respectfully,

Bry Slo

Bryan Slaton
State Representative
Texas House District 2

P.O. Box 2910 • Austin, Texas 78768-2910 • *phone* (512) 463-0880 • bryan.slaton@house.texas.gov

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 5, 2021 8:57 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411
Attachments: TCEQ Appplication 2411.pdf

MSW
125147

From: kevin.tibboel@l3harris.com <kevin.tibboel@l3harris.com>
Sent: Monday, October 4, 2021 2:14 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Kevin Tibboel

E-MAIL: kevin.tibboel@l3harris.com

COMPANY:

ADDRESS: 4040 MEADOWVIEW DR
CAMPBELL TX 75422-1872

PHONE: 9034561997

FAX:

COMMENTS: I protest the approval of this application Permit 2411 for multiple reasons: 1) The increased traffic volume of trucks turning on and off a busy State Highway 24 will create great potential for congestion, accidents, and likely fatalities on that already busy stretch of State Highway 24. 2) The entrance and exit to that property exists directly on the highway shoulder, therefore any delay in truck traffic will result in trucks backed up onto the highway creating a

significant risk to drivers and traffic. 3) The entrance and exit to that property is on a blind curve when driving north bound on Highway 24. If truck traffic is increased entering and exiting that property, the potential is high for traffic accidents. 4) The proposed location is in a residential area where nicer homes and property within the Campbell region are located. Depreciation of property value will undermine the income for the County of Hunt from Property Tax valuation and will greatly affect those who might consider building or buying higher quality of living properties in the future. The financial depreciation to the community will be much greater in this location than in a less populated area or where homes and property of a lower value. 5) Many of the residential areas are downwind of the predominant Southerly wind patterns and will create a horrific stench in the heat of summer and conditions that are downright unbearable. 6) The water shed from that area drains directly into the culverts and ditches that line the highway. Those drainages then empty into Shadow Lake Estates and the water reservoir to the West of the Sand Hills Golf Course. Leaching of any toxic or hazardous waste from this proposed facility will affect the water quality of those bodies of water.

I protest the approval of this application Permit 2411 for multiple reasons:

1) The increased traffic volume of trucks turning on and off a busy State Highway 24 will create great potential for congestion, accidents, and likely fatalities on that already busy stretch of State Highway 24.
2) The entrance and exit to that property exists directly on the highway shoulder, therefore any delay in truck traffic will result in trucks backed up onto the highway creating a significant risk to drivers and traffic.
3) The entrance and exit to that property is on a blind curve when driving north bound on Highway 24. If truck traffic is increased entering and exiting that property, the potential is high for traffic accidents.
4) The proposed location is in a residential area where nicer homes and property within the Campbell region are located. Depreciation of property value will undermine the income for the County of Hunt from Property Tax valuation and will greatly affect those who might consider building or buying higher quality of living properties in the future. The financial depreciation to the community will be much greater in this location than in a less populated area or where homes and property of a lower value.
5) Many of the residential areas are downwind of the predominant Southerly wind patterns and will create a horrific stench in the heat of summer and conditions that are downright unbearable.
6) The water shed from that area drains directly into the culverts and ditches that line the highway. Those drainages then empty into Shadow Lake Estates and the water reservoir to the West of the Sand Hills Golf Course. Leaching of any toxic or hazardous waste from this proposed facility will affect the water quality of those bodies of water.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, October 5, 2021 8:55 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: kjbrandt@hotmail.com <kjbrandt@hotmail.com>
Sent: Monday, October 4, 2021 4:50 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MS Kathryn Brandt

E-MAIL: kjbrandt@hotmail.com

COMPANY:

ADDRESS: 5829 PRIVATE ROAD 4223
CAMPBELL TX 75422-1827

PHONE: 2143179435

FAX:

COMMENTS: I object the approval of this application Permit 2411. 1) Pg 88 - does not show my house as a residence. Also, my neighbor at 5828 PR 4223 is not shown as a residence. My property and my neighbors' to the north and south don't show up as Agricultural. It shows Open Land. We actively produce hay. 2) Pg 91 - my pond is not highlighted as a freshwater pond. 3) Pg 144 - Landowner list appears out of date. People may not be notified that should have been. 4) Proposed facility will depress property values and prevent further development. 5) I already hear the beeping from the

sand trucks so I know I will hear a lot of truck noise. I can also smell deisel fumes from the sand trucks fairly often, so I'm pretty sure I will be bothered with more unwelcome odors. 6) Wondering if dust, or vapors settling on my property could make the hay produced dangerous for consumption. Also, even though the perimeter fence is supposed to catch debris, on a windy day, things can get airborne. I do not want to have to pick up trash in my fields before the hay gets cut. 7) Worried if any smells will attract the coyotes or wild hogs in the area, or even my dogs. I do not currently have to fence my dogs in, and do not want to have to put in fencing to keep them from investigating smells. Also concerned what chemicals might be sprayed to reduce smells and where those vapors would land. 8) Wondering if it would prevent me from being able to put a well on my property in the future if I wanted to. 9) Concerned that this is only 6 of 50 acres. What is next for this property if this goes through. I think the surrounding neighborhood is too nice for this type of facility.

MSW
125147

REVIEWED
SEP 02 2022
By GCW

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 SEP -1 AM 10:05
CHIEF CLERKS OFFICE

From: **Ted Crim** tedcrim1947@gmail.com
Subject: Proposed Solid Waste Facility in Hunt County
Date: August 28, 2022 at 4:50 PM
To: www.tceq.texas.gov/agency/decisions/cc/comments.html

Ms. Laurie Gharis, Chief Clerk
TCEQ, MC-105
P.O. Box 13087
Austin, Texas 78711-3087

Dear Ms. Gharis,

This message is to register absolute and unequivocal opposition to construction of the solid waste facility in Campbell, Texas, Hunt County Texas. In previous communications with the Texas Commission for Environmental Quality (TCEQ), I have delineated myriad reasons why such a facility must not be permitted to proceed with operation as proposed. This view has been articulated by virtually all affected constituencies including the adverse conditions that construction of the proposed facility will have an another State entity, Texas A&M University-Commerce (TAMUC). TAMUC has been a major force in higher education circles for over 133 years. Construction of this facility will have a negative affect on the University and the surrounding communities who, by choice, have pursued residence in the more pristine and undeveloped environment in which this unwanted facility is planned.

There is nothing to recommend the selected site for this facility but the wishes of one individual, and that individual will live over forty miles distant from this facility by choice since he could have easily selected a site closer to his place of business, residence and associated operations in Lamar County rather than plopping his operation in the midst of a State institution of higher education and several communities in the surrounding area that will certainly be adversely affected.

But, given the relevance and significance of the preceding, I would simply ask if you would enjoy a waste facility to be built adjacent to your collegiate alma mater or home town? This facility will diminish not support the quality of life for those residing in the affected area and will only reduce the prestige of TAMUC, an institution that has existed longer than Texas Tech, SMU, UNT, UTA, UTD, Rice, Texas State U of H, UTEP and many others. None affected by this proposed facility have voiced support for its construction and the President of the affected State institution of higher education has registered his collective opposition to this ill advised proposal.

I know this is Texas and business will always prevail. Fine, what about the business of the thousands of citizens who will be adversely affected. They too are a business that enables all other businesses to exist and they are unanimously opposed to this poorly conceived proposal that will be built somewhere else even if it is denied for approval in Hunt County. Josh Bray will just pick up his marbles and go somewhere else to build his waste facility. He is not concerned about the incalculable negative consequences that this proposal will have on thousands of citizens' or a venerable institution of higher education or he would have already withdrawn this poorly conceived proposal voluntarily.

I respectfully ask that the TCEQ rise to the occasion and reject this dreadful proposed waste facility and in doing so, serve notice that the TCEQ is not a rubber stamp agency that does place a priority on the wishes of the affected population. Business is business and Bray will only go to plan b which he already has as a contingency for non-approval. But he will need to consider the impact of a waste facility more than he obviously has not for the Hunt County site. Thus, TCEQ would not be preventing Bray from constructing a solid waste facility, just not in Hunt County.

Everybody wins and TCEQ demonstrates in the process that ALL perspectives are considered before making a decision in such matters, not just the viewpoint of business types. At the April 28, 2022 hearing in Greenville in which TCEQ staff were present, a question was asked about how many times has TCEQ denied such requests. The answer was essentially none. That does not reflect a fair and evenhanded process of consideration for such destructive proposals and does not demonstrate impartiality in considering those proposals.

Integrity and a dedication to absolute impartiality should be the foundation for TCEQ decision making. That was the basis upon which the TCEQ was formed and should be the hallmark for all TCEQ decisions. If not, then why have a TCEQ?

Respectfully submitted,

Ted R. Crim

Ted R. Crim
2313 Newcastle Circle
Plano, Texas 75075

972.964.1546 (Landline)

00408

Ted R. Crim

2313 Newcastle Circle

Plano, Texas 75075

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

2022 SEP -1 AM 10: 04

CHIEF CLERKS OFFICE

NORTH TEXAS TX P&DC
DALLAS TX 753
29 AUG 2022 PM 6

RECEIVED

SEP 01 2022

TCEQ MAIL CENTER
DA

Ms. Laurie Gharis, Chief Clerk

TCEQ, MC-105

P.O. Box 13087

Austin, Texas 78711-3087

78711$3087 B012

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Monday, May 2, 2022 2:56 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: teresa.k.crow@gmail.com <teresa.k.crow@gmail.com>
Sent: Wednesday, April 27, 2022 9:15 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Teresa Kay Crow

EMAIL: teresa.k.crow@gmail.com

COMPANY:

ADDRESS: 5676 COUNTY ROAD 4120
CAMPBELL TX 75422-1724

PHONE: 2149263760

FAX:

COMMENTS: I would like to know the specific names of each city and/or county that will be served by this facility. The application lists Hunt County and surrounding counties. There are many counties that surround Hunt County (Delta, Lamar, Fannin, Collin, etc.)

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Thursday, May 5, 2022 11:29 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: wafults@yahoo.com <wafults@yahoo.com>
Sent: Wednesday, May 4, 2022 11:51 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MRS Diana Fults

EMAIL: wafults@yahoo.com

COMPANY:

ADDRESS: 527 TURTLE CREEK DR
GREENVILLE TX 75402-4330

PHONE: 9034555192

FAX:

COMMENTS: I think this is a very poorly thought-out choice for this Waste Transfer Station on Hwy 24 due to many reasons. The traffic on that highway is extremely heavy constantly due to it being a major highway to get to Paris, Tx on to Oklahoma. School buses uses this highway daily as well many students driving to and from TAMU-C at Commerce for classes. Children are picked up for public schools along this highway. Blowing trash will be an added hazard. Property values in this area will decline. BUT MOST IMPORTANT IS THE SAFETY ISSUES of trucks entering and exiting on this

highway. I have relatives in two nice homes in that area that I visit and the traffic issues and safety of my families concerns me!!! THIS DOES NOT NEED TO BE THE LOCATION FOR A WASTE TRANSFER STATION on Highway 24.

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Wednesday, May 4, 2022 11:42 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: derekfunderburk9@gmail.com <derekfunderburk9@gmail.com>
Sent: Wednesday, May 4, 2022 11:39 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jon Funderburk

EMAIL: derekfunderburk9@gmail.com

COMPANY:

ADDRESS: 3012 WOODGLEN DR
COMMERCE TX 75428-6110

PHONE: 9034619087

FAX:

COMMENTS: Totally against

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Thursday, May 26, 2022 11:11 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: randy.harp@tamuc.edu <randy.harp@tamuc.edu>
Sent: Tuesday, May 24, 2022 1:46 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: DR. Randy Harp

EMAIL: randy.harp@tamuc.edu

COMPANY: Texas A&M Commerce

ADDRESS: PO BOX 3011
COMMERCE TX 75429-3011

PHONE: 9038865358

FAX:

COMMENTS: The Department of Agricultural Sciences at Texas A&M Commerce (as we now know) began almost 100 years ago with the first Department Head in 1924, Mr. Alvin R. Rix (1924-1958). Development of the university farm was initiated during this time and with Dr. A. C. "Buck Hughes" (1947-1980) teaching many of the animal classes. Dr. Hughes became Department Head when Mr. Rix retired. During the 1960's, the farm expanded to the current 1300 + acre property. We now have grown into a College of Agricultural Sciences and Natural Resources. We utilize beef cattle (150-

300 at a given time throughout the year), swine, horses (50-60), and sheep for the purposes of teaching, research, and outreach. The future of these continued efforts for training the next generation of animal professionals depends on the animal viability, health, and uniformity, as well as the lack of bias or compromised studies during research. The University has identified past research that demonstrates a Waste transfer station, such as proposed, has caused deleterious effects on animals. These effects will constantly threaten the work we do if this transfer station is approved (just hundreds of feet from where we conduct important work). This cannot occur if Texas A&M Commerce Agriculture is to be a viable and respected university for the research published. This does not only apply to now, but for the next 100 years and beyond. Farmers and ranchers in northeast and north central Texas depend on the data/publications that Texas A&M Commerce produces for better farm practices and management. This data cannot be biased or in any way compromised. One research project currently underway is studying the effects of stress on weanling calves. A "Waste Transfer Station," based on past research at other institutions", risks impacting this research. The noise (constant and repetitive), smells, truck noises and diesel discharges, along with potential ground water issues, and threat of fire would be detrimental and deleterious to the animal research at Texas A&M Commerce university farm. This cannot happen. The College of Agricultural Sciences and Natural Resources (CASNR) at Texas A&M Commerce has doubled its student count and faculty in growth over the past 6 six years. As the university grows, we will be looking to expand land opportunities to accommodate our teaching, research and outreach. Thus, future barriers, such as this transfer station, will negatively alter this potential for the animals, students and industry. We have an obligation to serve the community, region and state, thus detrimental waste stations of this nature being this close to the university only promotes compromised research. This cannot happen. The cost for the state of Texas to move the university farm due to this one request would cost the Tax- payers of Texas approximately $185 to 200 million dollars, simply to get started. In addition, new land purchases, that are not currently available, would be insurmountable. Texas A&M Commerce CASNR will have between 350 and 400 students (each semester) utilizing the university farm facilities in close proximity to the proposed waste transfer station. Thus, the potential of increased traffic, student research projects, increased need for animal research and teaching for supply food chain needs, etc. provides a further safety and mission of the university risk to all concerned. The ROI or real situation to the public vs the owner of this station is overwhelmingly detrimental and cast a negative light for the university, community and county. Also, I would like to point out that trash (paper, etc.) will be blown in the area of where livestock will be grazing on state property. It is a known fact that animals such as goats will attempt to eat this trash. Also, trash will be blown in the areas of Texas A&M Commerce Greenhouses, Agronomy research lab, Veterinary Biomedical Technology building, Livestock Center, Hydroponic Greenhouse, Sheep/Goat Center, etc. Who will be responsible for picking up this additional trash on both the highway and the state property that the university owns. The university already has a limited budget and staff to complete daily tasks. This chore does not need to be an added burden to these people. Is there a guarantee of being chemical free and restrictions be enforced on adjoining properties? Lastly, I would ask that members of the TCEQ committee visit the site before permitting to see how close this transfer station is to the constant traffic and livestock near the location.

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Monday, May 2, 2022 2:58 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: joanlambert@icloud.com <joanlambert@icloud.com>
Sent: Thursday, April 28, 2022 10:01 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: TX

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Joan Lambert

EMAIL: joanlambert@icloud.com

COMPANY:

ADDRESS: 2013 COUNTY ROAD 4312
CAMPBELL TX 75422-2211

PHONE: 9034564683

FAX:

COMMENTS: I believe that this proposed waste site is a detriment to our neighborhood. I feel the risk of traffic hazards and the filth/trash is not warranted in this location. It is the entrance to our community. This will hurt our property values. I have lived in my house since 1988 and I can't believe this is progress for our area. Please do not allow this entity to open and operate. Thank you for your consideration.

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Wednesday, May 4, 2022 8:50 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: cmumphrey72@gmail.com <cmumphrey72@gmail.com>
Sent: Tuesday, May 3, 2022 6:26 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Crystal Mumphrey

EMAIL: cmumphrey72@gmail.com

COMPANY:

ADDRESS: 4923 FM 2736
CAMPBELL TX 75422-1279

PHONE: 9034136947

FAX:

COMMENTS: We do not want this transfer station in Campbell. The proposed site is too close to a major highway, without acceleration/deceleration lanes would cause major traffic buildup and increase accidents in the area. The high winds will blow trash far beyond the "cleanup" area proposed and become an environmental nightmare for residents who depend on the waterways and farmland in the surrounding area.

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Wednesday, May 4, 2022 11:25 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: jillianbnichols@gmail.com <jillianbnichols@gmail.com>
Sent: Wednesday, May 4, 2022 11:04 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jillian Nichols

EMAIL: jillianbnichols@gmail.com

COMPANY:

ADDRESS: PO BOX 8
CAMPBELL TX 75422-0008

PHONE: 9034223783

FAX:

COMMENTS: I do not want the waste transfer station in our community. I do not want to see and smell the trash nor do I want to hear the noise associated with the facility.

MSW
125147

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Wednesday, June 15, 2022 9:06 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: adrianniapalmer@gmail.com <adrianniapalmer@gmail.com>
Sent: Monday, June 13, 2022 8:11 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Adriannia Palmer

EMAIL: adrianniapalmer@gmail.com

COMPANY:

ADDRESS: 5658 COUNTY ROAD 3204
CAMPBELL TX 75422-5122

PHONE: 9032742855

FAX:

COMMENTS: Yes we need a transfer station it will help with a lot of the trash problem.

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Monday, May 2, 2022 3:18 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: nickscott93@gmail.com <nickscott93@gmail.com>
Sent: Saturday, April 30, 2022 1:34 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Nicholas Scott

EMAIL: nickscott93@gmail.com

COMPANY:

ADDRESS: 2309 WASHINGTON ST APT C5
COMMERCE TX 75428-3582

PHONE: 9723634543

FAX:

COMMENTS: Hi TCEQ, I submitted verbal formal comments in the meeting but would like to make an additional comment. 1) Mr. Bray and his associates stated during the public hearing in Greenville that if his permit is approved and the waste transfer station is established, he would require his employees to make "daily checks for trash/litter lost from trucks 2 miles north and south from his facility. That is commendable and appreciated, but I would like to request that TCEQ please ensure that is put in writing in the permit. Additionally, before the permit is approved, I would like to

request that TCEQ please state in very clear terms how Mr. Bray will be held compliant to this promise, and how this will be enforced, and what enforcement violations will cost. For example, if a resident of Commerce takes a photo of trash pile in the same location several days in a row and sends that to TCEQ will that constitute an enforceable violation? I, and others in the community, are concerned that Mr. Bray's promise to pick up trash each day will not be a sustainable promise. 2) It was made apparent during the hearing in Greenville that the residents/organizations of Campbell and Commerce are strongly opposed to this proposed waste transfer site. For some background, in 1994 the Hi-Yield in Commerce was added to the Superfund registry when highly toxic levels of arsenic and pesticides were found in soil and groundwater samples (Hi-Yield: https://www.tceq.texas.gov/remediation/superfund/state/hiyield.html). This is just one of the reasons that Commerce residents are sensitive to potential major sources of pollution such as the proposed waste transfer site, and are highly suspect of private companies and their commitment to appropriately following environmental regulations. If this permit is approved, it will have permanent negative impacts to the quality of our environment, the future economic prospects of the residents, and the overall health and welfare of our community. I would like to urge the TCEQ to strongly consider these points before issuing a final decision. Thank you, Nicholas Scott Resident of Commerce for 4+ years Alumni of Texas A&M University-Commerce

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, May 23, 2022 1:15 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

MSW
125147

From: tibb000@gmail.com <tibb000@gmail.com>
Sent: Friday, May 20, 2022 4:49 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: KEVIN TIBBOEL

EMAIL: tibb000@gmail.com

COMPANY:

ADDRESS: 4040 MEADOWVIEW DR
CAMPBELL TX 75422-1872

PHONE: 9034561997

FAX:

COMMENTS: The Highway 24 Trash Transfer Station is 700 yds upwind from my home. It is directly adjacent to the busy section of State Highway 24 that connects Dallas, Tx and East Texas with the University of Texas A&M Commerce. The owners of the current property run a sand pit which has already scarred the surface of the natural landscape and can be seen from the Highway as a depreciation to county property values and aesthetics from the road. The trucks that already come and go from this sand pit frequently and consistently pull out directly onto the highway without regard for

oncoming traffic. The trucks that frequent this property frequently park along the median, waiting for the site to open first thing in the morning. This queue of large trucks on the side of a busy State Highway pose considerable danger to the students of Texas A&M University, the residents of Campbell and Commerce, and my 3 young, Student Drivers. Today, 20 May 2022 at 0730, I was cut off while travelling Southbound on Highway 24 by a truck with no tail lights, no signal lights, and no mud flaps. Rocks and dirt debris are frequently kicked up by these trucks and thrown into motor vehicle windshields, hoods, and left to cause damage along the highway. Any Southbound traffic is entering a blind curve to the exiting trucks as they cross 3 lanes of traffic and a median to return Southbound to Dallas. This entire permit and proposal is a traffic hazard, noise pollution to our neighboring houses and property, and should not be considered for approval in this rural neighborhood where citizens of Hunt County are trying to leave peaceable and quiet lifestyles.

MSW
125147

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Monday, June 6, 2022 9:05 AM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: Awhitmore59@yahoo.com <Awhitmore59@yahoo.com>
Sent: Sunday, June 5, 2022 12:02 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: MS Ashley Whitmore

EMAIL: Awhitmore59@yahoo.com

COMPANY:

ADDRESS: 5657 COUNTY ROAD 4317
CAMPBELL TX 75422-1863

PHONE: 5757492631

FAX:

COMMENTS: I have 23 acres nearby and have cattle and goats. This would greatly affect us and our property. Please consider the agriculture out here and the many impacts that this will cause.

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Wednesday, May 4, 2022 11:24 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number 2411

From: wick126@yahoo.com <wick126@yahoo.com>
Sent: Wednesday, May 4, 2022 11:12 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: James Wickersham

EMAIL: wick126@yahoo.com

COMPANY:

ADDRESS: 709 STATE HIGHWAY 24
CAMPBELL TX 75422-1343

PHONE: 9032673431

FAX:

COMMENTS: I do not want the waste transfer station on Highway 24. I travel to and from Commerce multiple times a day and I do not want to ruin the integrity of the landscape in that area or ruin the integrity of the landscape of the Texas A&M- Commerce University. This facility belongs somewhere other than our community.

Michael O'Malley

From: PUBCOMMENT-OCC
Sent: Monday, May 2, 2022 4:51 PM
To: PUBCOMMENT-WPD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 2411

From: jilldnichols@yahoo.com <jilldnichols@yahoo.com>
Sent: Monday, May 2, 2022 4:40 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 2411

REGULATED ENTY NAME HIGHWAY 24 TRANSFER STATION

RN NUMBER: RN111320396

PERMIT NUMBER: 2411

DOCKET NUMBER:

COUNTY: HUNT

PRINCIPAL NAME: TRANSFER STATION SOLUTIONS LLC

CN NUMBER: CN605924968

FROM

NAME: Jill Wickersham

EMAIL: jilldnichols@yahoo.com

COMPANY:

ADDRESS: PO BOX 8
CAMPBELL TX 75422-0008

PHONE: 9727578568

FAX:

COMMENTS: I do not want a waste transfer station in our community. Highway 24 is a main thoroughfare between Commerce and I30. Highway 24 is heavily travelled by students and employees. I do not want myself, other residents, or visitors to smell, see, and hear this facility. I do not want trash blowing across the countryside for myself and others to have to pick up and I do not want this facility dirtying up our landscape. There are already trucks that line up on both

sides of the highway in the morning waiting to enter the existing facility causing concerns for the safety of drivers as well.

MSW
125147

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

Date: April 29, 2022

To: Office of the Chief Clerk Docket Room

From: Brad Patterson, Office of the Chief Clerk BP

Re: Transfer Station Solutions, LLC;
Proposed Municipal Solid Waste Permit No. 2411

Attached please find the following materials from the public meeting on Transfer Station Solutions, LLC's Proposed Municipal Solid Waste Permit No. 2411, held in Greenville on April 28, 2022:

1. 2CDs,
2. 2 written comments, and
3. registration forms

Approximately 65 people participated in the meeting. Fourteen individuals provided formal oral comments.

cc: Don Nelon, Air Permits Division
Sierra Redding, Environmental Law Division

(1)

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Ronald Manning

Mailing Address: 633 Yellow Bridge Rd.

Physical Address (if different): _____

City/State: Van Alstyne, Tx **Zip:** 75495

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

Email: rmanning7674@sbcglobal.net

Phone Number: (214) 796-4395

- 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)

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

00428

(1)

3.2.1 Site Access Vehicular traffic to the facility will access the facility using SH 24. Public access to the facility will be provided by one entrance located on the east side of SH 24, which runs north/south west P a r t s I/II Highway 24 Transfer Station General Application Requirements Revision 0 I/I I - 1 4 M:Pro\16219083\drafts\...\Parts I-II TS Hunt Co August 2021 of the site. SH 24 is a 4-lane highway, which consists of two 12-foot asphalt paved lanes in each direction (north/south). An existing driveway serves a business at the location of the proposed transfer station property. This driveway entrance will be improved for the transfer station. As necessary, the Owner will modify the current driveway permit with the Texas Department of Transportation prior to construction of the driveway entrance improvements. The improved site access road will be a 30-foot, two-lane, all-weather on-site road to accommodate two-way traffic entering and exiting the facility. The driveway for this on-site road intersects SH 24 at an approximate 90-degree angle at a location with no sight restrictions or conflicts that impair the turning of the vehicles or the view of drivers on SH 24. Vehicles that turn into the proposed facility entrance driveway at SH 24 (see Part I/II, Figure I/II-6 – Site Layout Plan) will have approximately 445 feet of queuing distance before they reach the scale house. The site exit will be controlled by a stop sign. Traffic flow directions are also provided on Figure I/II-6. Based on the information above, SH 24, which provides access to the facility, is considered adequate in capacity and structure to continue to serve the needs of the owner or operator and the general public. Subject to coordination with TxDOT and Hunt County, public roadway improvements are not proposed, such as turning lanes, storage lanes, etc., associated with the site entrance/exit. Coordination with TxDOT and Hunt County is included in Appendix I/II-A.3.

Comments:

1. **445 Ft of queuing distance between SH24 & scales provides for the following vehicles in que assumes 10' spacing between vehicles:**
    a. **Transfer Vehicle – 41 ft +10'=51' (445' / 51'= 8.7= 8 vehicles in queue)**
    b. **Garbage Truck (Labriel/Wittke Front Loader truck) – 25 ft+ 10 Ft = 35' (445/35'= 12.7= 12 vehicles in queue)**
2. **No mechanism is proposed to de-bunch (anti-bunching) vehicles coming into facility.**
    a. **Concern is that if more than those vehicles or combination are in queue, then vehicles will spill onto Hwy 24 causing a hazard. Do not agree with above statement that "** "adequate in capacity and structure to continue to serve the needs of the owner or operator and the general public".
3. **Speed Limit at the entrance to the transfer station is 75MPH. Transfer facility trucks will be slowing from 75 mph to make the turn into the facility or conversely turning onto Hwy 24 and trying to speed up to the posted speed. Both these conditions will create opportunities for fatal accidents.** Do not agree with the following statement. " Subject to coordination with TxDOT and Hunt County, public roadway improvements are not proposed, such as turning lanes, storage lanes, etc., associated with the site entrance/exit."

RECEIVED
APR 2 8 2022
AT PUBLIC MEETING

3.2.2 Traffic Volumes All traffic will access the facility via the entrance off of SH 24. Within one-mile of the facility, no other county roads will be used for vehicles to access the facility. The 2019 TxDOT daily traffic volumes in the vicinity of the facility were obtained, which represent the average two-way traffic passing a specific location in a 24-hour period. Future traffic is projected through the year 2050 based on TxDOT data and generated facility traffic volumes discussed in Section 3.2.3. While the expected life for many transfer stations, including this one, may vary determined to various future factors, which could change over time. However, for this analysis we evaluated traffic impacts over approximately the next 30 years, which we believe are representative of the maximum traffic volume to be expected at this facility. The existing traffic volumes for roadways within three miles of the facility are shown on Figure I/II-7. Table I/II-3.3 includes traffic count data for the SH 24 access road based on existing and future projected data based on the projected population growth and facility generated traffic. Table I/II-3.3: Existing and Future Traffic Volumes for State Highway 24 1. Traffic volumes are in units of vehicles per day. 2. Source: Texas Department of Transportation, Traffic Analysis 3. Assumes traffic increase is proportional to population increase, in addition to facility generated traffic (see Table I/II-3.3). Texas Demographic Center forecast for Hunt County includes average population increase of 0.64% per year.

YEAR	VOLUME
2019	10,215
2022	10,498
2050	12623

VEHICLES PER DAY

Table I/II-3.3: Existing and Future Traffic Volumes for State Highway 24

Comments:

a. **Traffic volume per day is meaningless.**
   i. **Could not find an hourly traffic volume in this application. A profile of traffic volume per hour would show that at peak drive time, the traffic is much greater than averaging traffic over a 24 hour period (437 vehicles per hr). Suspect that during 7am – 3pm most of the transfer facility traffic would peak as would the commuter traffic**
   ii. **Driver safety is a function of traffic present.**
   iii. **Commerce is home to a commuter college. How is that included in the scaling of future traffic as a function of population growth?**

3.2.3 Facility Generated Traffic Volumes

Traffic generated by the facility is estimated based on the projected incoming waste rate and assumptions regarding the vehicles used for waste transport in and out of the facility. The maximum total volume of traffic generated by the facility is expected to be approximately **370** round trips per day, as shown in Table I/II-3.4.

Table I/II-3.4: Facility Generated Traffic

	Round trips per day	**Round trips per day**
Vehicle Type	**At Initial Waste Acceptance Rate (400 tons/day)**	**At Max Waste Acceptance Rate (1000 tons/day)**
Haul Trucks	53	107
Transfer Trailers	17	35
Citizen-small vehicles	10	20
TS O Vehicles	2	4
Office personnel vehicles	2	4
Other	2	4
Total	**86**	**174**

Comparison of the traffic to be generated at the facility with the traffic data on Table I/II-3.3 shows that the volume of the traffic generated by the facility represents a relatively small percentage of the projected volume on the access road, SH 24, intended for use by the facility within one-mile of the facility. Based on the findings of this traffic study, there are no existing or future restrictions on the main access roadway (SH 24) within one-mile of the facility that would prevent safe and efficient operations for both the transfer station-generated traffic, as well as the other vehicles in the area.

Comments:

1. **Not sure how the 370 RTs were generated from the numbers in the table.**
2. **Operating hours = 5A – 6P=13 hrs; 370 RTs / 13hrs = 28 RTs / hr assuming a uniform distribution arriving at the facility. Need model of the vehicle type and number to determine if the queue wills spill out to SH 24. Maybe will have to queue up transfer vehicles on side roads in the area. Assume they will all have communication capability.**

1.

2

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Denise Morgan WORK

Mailing Address: 3228 CR 4403 / 409 N. Patterson

Physical Address (if different): Campbell TX 75422

City/State: Commerce TX **Zip:** 75428

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

Email: dmorgan@campbellisd.org

Phone Number: (903) 246-9315 opt 9

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

  If yes, which one? Campbell ISD

☑ **Please add me to the mailing list.** Work Address please

☑ **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)

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

00432

RECEIVED
APR 28 2022
AT PUBLIC MEETING

CAMPBELL Independent School District
480 North Patterson
Campbell, TX 77422
903-246-9315
Dr. Denise Morgan, Superintendent

April 28, 2022

My name is Denise Morgan, and I am the superintendent of Campbell ISD. First let me start with Thanking you for allowing me to address this committee and audience about the school districts concern for the waste transfer facility slated to be in Campbell TX. We have four major concerns:

1. Environmental impact for now and the future- although we are unable to conduct our own study we are greatly concerned about the waste materials, liquids, and gases that will absolutely impact soil, air and water as materials are spilled, squashed, and loaded on and off and on vehicles again. As well as spilling out as they roll up and down the highway. This can infiltrate our soil and water causing health concerns for people and livestock as runoff happens.
2. As a wife and mother of DPS Troopers- Traffic concerns with buses and students driving down the highway while all these large truck transport and maneuver in and out of the sight causes my school district great distress. We have major issues already in our area with 18-wheeler wrecks due to unturns, high centering, and just slow regular turns. My daughter is a surviving victim to a slow uturn by and oversized vehicle in a blind area of HWY 24/50. The location suggested is in a curve of HWY 24/50. With speeds at 75 mph, stopping as vehicles pull out and into this

location is very dangerous. We already have problems with the rock/sand trucks and their ability to make it safely across the road or blocking/impeding traffic that we do not need more vehicles doing the same. In other communities, where I have seen transfer facilities the traffic is so backed up due to the length of time it takes to unload causing people to be stopped on roadways. Such a dangerous situation on a highway.

3. Smell- We have all our students outside on the playground and football field. Although this maybe a few miles down the road. These smells in the air are not contained to a small radius. Our students do not need to be exposed to less than great air as they are at recess or playing games. We want a positive experience for visiting communities as well.
4. If this is such a great facility to have, then build it in the communities that will be sending their trash to Paris, TX. If we need a transfer facility then Rockwall County, Dallas County and any other county sending their trash to the dump in Paris should have to build it in their county. If they don't want it, we certainly do not. So, build it there or just keep driving down the road to Paris and dump it there. CAMPBELL DOESN'T WANT IT.

Thank you for your time.

3

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: CHRISTOPHER "JEREMY" BRECHEISEN

Mailing Address: 1686 CR 4208

Physical Address (if different): 1686 CR 4208

City/State: CAMPBELL, TX **Zip:** 75422

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

Email: CBRECHE@YAHOO.COM

Phone Number: (903) 513-6875

- 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)

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

00435

(4)

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Jon Manning

Mailing Address: 3440 HWY 24

Physical Address (if different): _____

City/State: Campbell, TX **Zip:** 75422

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

Email: jemanning dvm@gmail.com

Phone Number: (214) 729 7788

- 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)

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

00436

5

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Travis Ball TAMUC

Mailing Address: PO Box 3011

Physical Address (if different): _____

City/State: Commerce, TX **Zip:** 75429

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

Email: Travis.Ball@tamuc.edu

Phone Number: (903) 886-5060

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

  If yes, which one? Texas A&M University - Commerce

☒ **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)

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

6

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Cathy Giles

Mailing Address: P. O. Box 58, Campbell, Tx 75422

Physical Address (if different): 3714 State Hwy 24

City/State: Campbell **Zip:** 75422

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

Email: cgiles@gilesgroup.net

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)

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

00438

7

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Jared Mumm

Mailing Address: 1717 Division St. Commerce TX

Physical Address (if different): _____

City/State: _____ **Zip:** 75428

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

Email: jared.mumm@yahoo.com

Phone Number: (208) 308-5785

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

  If yes, which one? TAMUC

☐ **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)

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

00439

8

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Randy Harp

Mailing Address: PO Box 3011

Physical Address (if different): 64 Dolly Rd Sulphur Springs Tx 75482

City/State: Commerce Tx **Zip:** 75429

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

Email: randy.harp@tamuc.edu

Phone Number: (903) 886-5351

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

  If yes, which one? Texas A&M Commerce

☐ **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)

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

00440

9

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: DAVID Giles

Mailing Address: P.O. Box 58

Physical Address (if different): 3714 State Highway 24

City/State: Campbell TX **Zip:** 75422

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

Email: dgiles@gilesgroup.Net

Phone Number: (817) 366-2026

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

  If yes, which one? Community Member

☒ **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)

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

00441

10

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Bobby Stovall

Mailing Address: PO Box 1097

Physical Address (if different): _____

City/State: Greenville, TX **Zip:** 75403

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

Email: bstovall@huntcounty.net

Phone Number: (903) 408-4146

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

  If yes, which one? Hunt County Judge

☑ **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)

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

00442

11

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Alison Soecler

Mailing Address: 137 Mockingbird Way Caddo Mills 75135

Physical Address (if different): _____

City/State: _____ **Zip:** 75155

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

Email: GOODWINA.910gmail.com

Phone Number: (972) 489 4324

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

  If yes, which one? ~~TAMUC~~ HP

☐ **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)

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

00443

12

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: JOE MC CRACKEN

Mailing Address: 1205 NORTHWOOD CT.

Physical Address (if different):

City/State: COMMERCE TX. **Zip:** 75428

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

Email: BL2LONESTAR@EARTHLINK.NET

Phone Number: (417) 622-1734

- 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)

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

00444

13

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Elizabeth Tarrant

Mailing Address: 2006 FM 3218 ~~Campbell, TX 75422~~

Physical Address (if different): _____

City/State: Campbell, TX **Zip:** 75422

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

Email: et100103@gmail.com

Phone Number: (254) 413 3880

- 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)

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

00445

14

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Nick Scott

Mailing Address: 2309 Washington St Apt C5 Commerce, TX

Physical Address (if different): _____

City/State: Commerce TX **Zip:** 75428

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

Email: NICKSCOTT93@gmail.com

Phone Number: (972) 363- 4543

- 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)

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

00446

YOUR STATION 88.9 KETR KETR.ORG

Mark Haslett
News Director
mark@ketr.org
KETR-FM
P.O. Box 4504
Commerce, Texas 75429-4504
Phone: 903.886.5334
Cell: 903.246.1498
Studio: 903.886.5387

A service of Texas A&M University-Commerce

TCEQ Registration Form

April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

_____

Mailing Address: _____

Physical Address (if different): _____

City/State: _____ **Zip:** _____

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)

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

00447

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Michael Garrett

Mailing Address: 4274 FM 1568 Campbell 75422

Physical Address (if different): _____

City/State: Campbell **Zip:** 75422

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

Email: garrett1@academicplanet.com

Phone Number: (903) 456-2068

- 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)

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

00448

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Jeremy Dicken

Mailing Address: 3961 FM 1568 Campbell, TX 75422

Physical Address (if different): _____

City/State: _____ **Zip:** _____

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

Email: Jdicken@C21pathlon

Phone Number: (903) 455-7490

- 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)

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

00449

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: AMBER W. COUNTIS

Mailing Address: 2721 Tanglewood Dr Commerce, TX 75428

Physical Address (if different): _____

City/State: Commerce, TX **Zip:** 75428

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

Email: ambercountis@gmail.com

Phone Number: (903) 240-1320

- 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)

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

00450

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: James B. Brown

Mailing Address: 2585 CR 4312

Physical Address (if different): _____

City/State: Campbell TX **Zip:** 75422

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

Email: jmandwell1@gmail.com

Phone Number: (903) 886 7431

- 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)

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

00451

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Kasey Babb

Mailing Address: 1567 CR 4208

Physical Address (if different): _____

City/State: Campbell Texas **Zip:** 75422

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

Email: kaseybabb@rocketmail.com

Phone Number: (903) 456-4784

- 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)

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

00452

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Brad Sharpe

Mailing Address: 5702 Whistling Straits Drive

Physical Address (if different): _____

City/State: College Station, TX **Zip:** 77845

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

Email: bsharpe@tamus.edu

Phone Number: (979) 458-6145

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

  If yes, which one? Texas A&M University – Commerce

☒ **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)

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

00453

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Miguel Suazo

Mailing Address: 310 Ashburn Cove Austin TX 78737

Physical Address (if different): _____

City/State: TX **Zip:** 78737

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

Email: miguel.suazo@hustonhackwell.com

Phone Number: (202) 251-7761

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

  If yes, which one? TX A&M Commerce

☒ **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)

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

00454

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: DAVID HALE

Mailing Address: 2706 Tanglewood Dr Commerce, TX 75428

Physical Address (if different): SAME

City/State: _____ **Zip:** _____

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

Email: davidmhale@mac.com

Phone Number: (903) 456 6656

- 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)

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

00455

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Gaylord Hurley

Mailing Address: 305 Fernell Place

Physical Address (if different): _____

City/State: Tyler TX **Zip:** 75702

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

Email: gaylord@gthlaw.net

Phone Number: (903) 597-6197

- 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)

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

00456

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Connie Hale

Mailing Address: 8045 CR 4209

Physical Address (if different): _____

City/State: Campbell, TX **Zip:** 75422

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

Email: conniehale

Phone Number: (903) 456-6017

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

  If yes, which one? Family Business - Farm

☑ **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)

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

00457

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Tim Hall

Mailing Address: 3305 Hwy 24

Physical Address (if different): _____

City/State: Campbell, TX **Zip:** 75422

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

Email: trhall55@gmail.com

Phone Number: (214) 505-3271

- 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)

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

00458

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: John Hall

Mailing Address: 3307 Hwy 24

Physical Address (if different): _____

City/State: Campbell, TX **Zip:** 75422

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

Email: jhall120390@att.net

Phone Number: (903) 720-2258

- 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)

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

00459

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Michael Johnson

Mailing Address: michael.johnson@tamuc.edu

Physical Address (if different): _____

City/State: Commerce, TX **Zip:** _____

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)

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

00460

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Crystal Mumphrey

Mailing Address: 4923 FM 2736

Physical Address (if different): _____

City/State: Campbell, TX **Zip:** 75422

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

Email: cmumphrey72@gmail.com

Phone Number: (903) 413-6947

- 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)

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

00461

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: JARED ROBINSON

Mailing Address: 2634 STATE HIGHWAY 24

Physical Address (if different): _____

City/State: CAMPBELL TX **Zip:** 75422

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

Email: JRR01@OUTLOOK

Phone Number: (903) 413 9637

- 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)

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

00462

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Janis Stroope

Mailing Address: 2215 CR 4208

Physical Address (if different): _____

City/State: Campbell **Zip:** TX 75422

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

Email: beehorse51@yahoo.com

Phone Number: (903) 456-4338

- 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)

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

00463

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: NEAL STEWART

Mailing Address: 4120 FM 1568

Physical Address (if different): SAME

City/State: CAMPBELL TEXAS **Zip:** 75422

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

Email: NNEALSTEWART@GMAIL.COM

Phone Number: (903) 886-7429

- 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)

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

00464

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Paul Voss

Mailing Address: 5615 CR 4704

Physical Address (if different): _____

City/State: Commerce, Texas **Zip:** 75428

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

Email: Paul@commerce-chamber.com

Phone Number: (903) 886-3950

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

  If yes, which one? Chamber of Commerce

☑ **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)

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

00465

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Brad & Jill Wickersham

Mailing Address: P.O. Box 8 Campbell, TX 75422

Physical Address (if different): 709 State Hwy 24 Campbell, TX 75422

City/State: _____ **Zip:** _____

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

Email: jilldnichols@yahoo.com

Phone Number: (972) 757-8568

- 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)

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

00466

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: DANIEL RAY

Mailing Address: 2608 STONEWALL, GREENVILLE TEXAS, 75401

Physical Address (if different): —

City/State: _____ **Zip:** _____

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

Email: DANIEL@SCOTTRAYLAW.COM

Phone Number: (903) 217 2828

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

  If yes, which one? HUNT COUNTY

☐ **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)

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

00467

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Kelsi Mahan

Mailing Address: 1345 CR 4216 Campbell Tx 75422

Physical Address (if different): _____

City/State: _____ **Zip:** _____

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

Email: kelsi.mahan@hotmail.com

Phone Number: (936) 554-2408

- 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)

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

00468

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Mike Hale

Mailing Address: 8045 CR 4209

Physical Address (if different): _____

City/State: Campbell TX **Zip:** 75422

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

Email: windymeadowsfarm@gmail.com

Phone Number: (903) 456 6024

- 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)

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

00469

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Derald Harp

Mailing Address: 6806 Bear Ln

Physical Address (if different): _____

City/State: Greenville TX **Zip:** 75402

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

Email: dochart@yahoo.com

Phone Number: (903) 494-5025

- 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)

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

00470

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Steven Harrison

Mailing Address: 2533 CR 4105

Physical Address (if different): _____

City/State: Greenville TX **Zip:** 75401

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

Email: sharrison@huntcounty.net

Phone Number: (903) 366-3508

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

  If yes, which one? County Commissioner, Pct. 4 - Hunt Co.

☐ **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)

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

00471

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: Michael Heine

Mailing Address: 5710 FM 2736

Physical Address (if different): _____

City/State: Campbell, Tx. **Zip:** 75427

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

Email: mike@huntexproperties.com

Phone Number: (903) 456-1505

- 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)

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

00472

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: TED A. CRIM

Mailing Address: 2313 NEWCASTLE CIRCLE, PLANO, TX 75075

Physical Address (if different): _____

City/State: PLANO, TEXAS **Zip:** 75075

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

Email: TEDCRIM1947@gmail.com

Phone Number: (972) 964-1546

- 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)

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

TCEQ Registration Form
April 28, 2022

Transfer Station Solutions, LLC
New Municipal Solid Waste Permit
Proposed Permit No. 2411

PLEASE PRINT

Name: SARA WILSON

Mailing Address: 454 CR 3101

Physical Address (if different): _____

City/State: GVL TX **Zip:** 75402

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

Email: _____

Phone Number: (214) 454

- 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)

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

00474

MSW
125147

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Response to TCEQ Executive Director's Opinion
Permit 2411

REVIEWED
SEP 27 2022
By GCW
RFR

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 SEP 26 PM 01 15
CHIEF CLERKS OFFICE

I am an "affected party" and a citizen of Hunt County, Texas. I live at 3714 State Highway 24 in Campbell, Texas. As defined in the TCEQ letter of 24 August 2022, I am submitting a **request for re-consideration of the Executive Director's decision**. The basis for my request is detailed below:

Issue #1 -- Location of the Public Meeting

1. THE TCEQ Executive Director failed to ensure that the people most closely involved with this proposed facility had an opportunity to participate. Student, faculty and staff were put at a disadvantage by the TCEQ Executive Director's decision to host the community event in Greenville. This action precluded concerned citizens on a limited income and university students from being able to participate. TCEQ had the unilateral power, authority and discretion to set the sight of the meeting. TCEQ Executive Director's decision reflects his bias toward the permit applicant.

Issue #2 – Review of the Proposed Site

1. TCEQ's review and survey of the proposed site was not made public, nor did TCEQ reference their site inspection during the public meeting. TCEQ Executive Director was not transparent in their site assessment.

Issue #5 – Application Review

1. The only standard embraced by the TCEQ is whether or not the permit application meets the "rules."
    a. TCEQ cannot point to where it consulted with independent sources to verify the claims and representations made by the petitioner.
    b. TCEQ's review relies exclusively upon representations made by the applicant, which can be biased and partisan.
    c. By failing to seek independent verification of representations and claims, TCEQ is, in fact, "rubber-stamping" the application process.
2. TCEQ is abandoning its obligation to protect the Texas environment and the citizens of the state of Texas. Replacing TCEQ with a computer-generated set of forms that permit applicants can complete would streamline the application process and be a more efficient use of Texas taxpayers' funds.
    a. Just because a facility can be built; DOES NOT ANSWER the question of whether it SHOULD BE BUILT.

Issue #6 – Effect on Property Values and Local Tax Revenue

1. TCEQ Executive Director is hiding behind arguments that it does not have jurisdiction. In doing so, TCEQ is abandoning its moral and ethical obligations to the citizens of this county and state.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #10 – Environmental Impact Study

1. TCEQ is endangering the environment and the citizens of this state by relying upon the sole of the representations and claims made by self-serving permit applicants. Failure to perform and objectively consider the potential environmental impact is reckless, imprudent, and borders on dereliction of duties.

Issue #12 --- Traffic and Roads

1. TCEQ's response to this issue blatantly ignores the potential risk that this proposed facility creates. The road that serves this area is posted for 75 mph. Because this road does not have effective enforcement, most traffic travels at speeds in excess of 80 to 85 mph.
2. This road is traveled by commuter students headed to or from classes.
   a. TCEQ Executive Director intentionally ignored the presentation and discussion that occurred during the community meeting regarding the configuration of the highway in front of the proposed facility.
   b. The overhead photographs presented at the community meeting clearly shows significant curves that limit the sight and potential reaction time for drivers traveling the speed limit or above to reaction to slow-moving garbage haulers.
   c. The cross-over points at this facility are inadequate to permit an 18-wheeler to cross safely.
3. The traffic on this road has increased exponentially in recent years. This increase is expected to continue in the next few years.
4. The inescapable fact is that TCEQ is authorizing the facility to be built and operated by allowing this permit to proceed.
   a. The facility's existence and operation constitute a significant safety risk and hazard to the citizens that travel on this road.
   b. Allowing this permit to be approved will make TCEQ complicit in whatever accidents and deaths occur on this patch of ground. Make no mistake, the blood and death that will inevitably occur on this highway in front of the facility that you approve will belong to TCEQ.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #13 00 Negative Impact on Community

1. If TCEQ is jurisdictionally prohibited from considering social and economic impact, then please explain why the state of Texas needs to have your organization.
2. TCEQ again relies on a "ground survey" in the application. TCEQ fails in its duties to the citizens of this state by not seeking independent surveys and statistical data.
3. The Executive Director fails to cite the basis for the decision that "adequate information on growth trends" was provided in the application.
    a. Growth plans outlined by the Greenville Chamber of Commerce and the Hunt County Legislative Task Force present a much different picture of economic growth than outlined in the permit application.
    b. TCEQ is remiss and derelict in not even attempting to secure and consider objective economic and social growth trend data. These data are publically available if TCEQ desires accurate data.

Issue #15 – Land Use Compatibility

1. TCEQ Executive Director fails to consider the private property, commercial business operations, and the presence of a major state-supported university with significant agriculture research d related functions. These facilities are currently established; others are being planned.
2. TCEQ Executive Director fails to recognize the rights of these citizens and organizations.

Issue #18 – Effects on Texas A&M University-Commerce

1. TCEQ Executive Director flagrantly ignores the statements made regarding the devastating effects this proposed facility would have upon its agricultural research and related agricultural operations.
2. The Executive Director fails to provide objective or scientific facts to support the claims that such a facility would not harm the university's interests.
3. The Executive Director fails to justify how permitting the construction of this proposed facility would not harm the traveling public, students, facility, and staff of this university.
4. State Highway 24 is the "Gateway Access" to the university. Almost everyone traveling to the university must travel down this road. The construction of a facility where 1,000 tons per day of solid waste is being transported is imprudent and deliberatively reckless.
    a. The net impact of TCEQ's Executive Director is to sanction the invalidation and debase of a regional academic institution.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

5. TCEQ's Executive Director is remiss in not defining the review process made by TCEQ in determining that the proposed facility would not compromise the health and safety of the students, faculty, and staff at Texas A&M University-Commerce.

Issue #19 – Location

1. See the comments cited in Issue #12

Issue #21 – Effects on Soil Quality, Agriculture, and Vegetation

1. TCEQ's Executive Director is silent about how TCEQ intends to monitor and enforce (consequences) unpermitted discharges of contaminated water.
2. TCEQ's Executive Director fails to require the permit applicant to demonstrate how "liquids that are released from the waste will be managed as contaminated water."
    a. TCEQ's Executive Director fails to state how TCEQ will discern and monitor these activities.

Issue #22 Environmental Injustice

1. TCEQ's Executive Director fails to address the concerns of Kayla Price and Nicholas Scott that TCEQ is failing to protect human health and the environment.
2. TCEQ's Executive Director fails to provide any objective or scientifically established publications that assert to the citizens of the state of Texas that socioeconomic and racial status variables have been considered and objectively evaluated.
3. "Just because, "you say so" does not make it so."

Comment #23 – Waste Acceptance

1. TCEQ's Executive Director is remiss in not mandating that the permit applicant articulate a protocol for screening and preventing unacceptable waste (hazardous waste, PCBs, radioactive, asbestos-containing materials, and liquid waste) from entering the proposed transfer station.
2. TCEQ's Executive Director is remiss for not establishing consequences for any violations of the screening of and permitting unacceptable waste (hazardous waste, PCBs, radioactive, asbestos-containing materials, and liquid waste) to enter the transfer station.
3. TCEQ's Executive Director is remiss for not establishing a reporting structure that publically presents the proposed transfer station's performance and designating a person to enforce the operations of the proposed transfer station.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #26 – Effect on Students in the Campbell ISD

1. TCEQ's Executive Director is remiss in not defining the review process made by TCEQ in determining that the proposed facility would not compromise the health and safety of the students of Campbell ISD.

Issue 28 & 29 --- Contaminated Water Management & Surface Water

1. TCEQ's Executive Director is silent as to the ways TCEQ intends to monitor and enforce (consequences) unpermitted discharges of contaminated water.
2. TCEQ's Executive Director fails to require the permit applicant to demonstrate how "liquids that are released from the waste will be managed as contaminated water."
    a. TCEQ's Executive Director fails to state how TCEQ will discern and monitor these activities.

Issue #30

1. This is a matter of "Cause & Effect." If TCEQ authorized the construction of the proposed facility, then TCEQ should bear the cost of monitoring the safety of the drinking water of the surrounding residents.
2. TCEQ's Executive Director is remiss in not establishing some form of monitoring system to ensure the safety of the drinking water for the surrounding residents.
3. TCEQ's Executive Director is remiss in not investigating the size and depth of the area's underground aquifer. Failure to exercise reasonable and prudent investigation is negligence and more than a flagrant disregard for health and safety – it is an unacceptable indifference characterized by lassitude and languor.

Issue #31 – Two-Sided Building

1. TCEQ's Executive Director is remiss in not mandating that a 4-side building be constructed.
2. TCEQ's Executive Director is remiss for not using his authority to protect the interests of Texans

Issue #32 – Incineration & Other "Add-Ons"

1. TCEQ's Executive Director is remiss in not specifying how "add-ons' will be monitored and sanctioned by TCEQ

Issue #35 – Air Quality

1. TCEQ's Executive Director is remiss in not mandating that the permit applicant devise a system for monitoring and correcting any significant variations in the air quality (Specifically, cancer-causing air particles and nuisance odors).

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

Issue #36 – Odor Control

1. TCEQ's Executive Director is remiss for not mandating that the permit applicant monitor odors.
2. TCEQ's Executive Director is remiss for not developing and/or mandating that the permit applicant develop a system to ensure the air quality is safe and free of odros.
2. TCEQ's Executive Director is remiss for not specifying the corrective steps to . expected by TCEQ if odors constitute a problem for the surrounding residents and business operators.

Issue #37 -- Vectors

1. TCEQ's Executive Director is remiss for not explicitly addressing the issues ra in this topic. TCEQ's Executive Director intentionally avoids the topic by repeatedly stating the design characteristics of the proposed facility. TCEQ's Executive Director's response dodges and sidesteps the reality that vectors are inevitable, especially when 1,000 tons of solid waste per day are being brought into a facility.
2. In essence, TCEQ's response is NO RESPONSE – simply because there is no plan for containing vectors.
3. The January 17, 2020 article in PUBLIC HEALTH points out that it examines the research gaps in the "vicious cycle of solid waste, disease vectors, and poverty." The results affirm that "Urban biological vector-borne diseases, especially Aedes-borne diseases, are associated with solid waste accumulation." The article describes how these vectors "create burrowing sites and food reservoirs" in waste facilities.
4. TCEQ's Executive Director is remiss for not designing a system of robust epidemiological measurements of this proposed facility.
5. TCEQ's Executive Director is remiss for not proposing a framework for solution-based research of this facility and other such facilities around the state of Texas.

Issue #40 – Fire, Fire-Fighting Activities

1. TCEQ's Executive Director is remiss for not requiring that this permit applicant – or that any permit applicant in the future not demonstrate that an adequate supply of water exists to contain and extinguish a facility fire – whether that fire was "expected" or "unexpected.
    a. TCEQ should mandate that critical event response times be formulated and that critical response teams be training in how to prevent out of control fi

817-366-2026
dgiles@gilesgroup.net

b. TCEQ should mandate that c...
that critical response teams be training in...
disasters, including flooding, tornados, power surges., c...

2. TCEQ's Executive Director is remiss for not requiring that the permit app... demonstrate the amount of water and water pressure needed to extinguish a facility fire.

3. TCEQ's Executive Director is remiss for not requiring that this co... before approval.

4. TCEQ's Executive Director is remiss not protecting the citizens, businesses, wildlife, people and property of the surrounding area.

Issue #43 – 72-Hour Waste Storage

1. TCEQ's Executive Director is remiss for not adhering to the standards that the facility "must not lead to nuisances, such as odors, vectors or windblown waste." Permitting over 1,000 tons of solid waste to be exposed to 72 hours of hot Texas sun – with temperatures in excess of 105 degrees and not expecting odors and vectors is ludicrous or borders of mental delusions.

2. TCEQ's Executive Director is remiss in offering the community the solution of reporting such "nuisances" of writing the matter to Region 4 TCEQ Office, which is located 95 miles away (2 hours by car) in Fort Worth is frankly offensive and insulting. TCEQ's Executive Director's response to this issue is both debasing and humiliating.

Issue #47 – Individual Rights

1. TCEQ's Executive Director is remiss in not grasping the importance of Mr. Brecheisen's comments. TCEQ's apparent disregard for individual rights is simply disrespectful, especially since most TCEQ's are based on biased, self-serving statements from the permit applicant.

2. TCEQ Executive Director's opinions are in direct opposition to community members, School Board members and School Board Superintendents, Communi..., officers, academic professors, university Deans, a university President, as well as the Hunt County Judge and County Commissioner, as well as representatives from state representative both state senator offices.

3. The TCEQ Executive Director's opinion directly opposes a community comprised of people, businesses, schools, universities and others that do not want this facility on State Highway 24.

David A. Giles, Ph.D.
3714 State Highway 24
Campbell, Texas. 75422
817-366-2026
dgiles@gilesgroup.net

4. It is obvious that Mr. Bray is using the land and resources of Hunt County to further enrich his personal wealth. His actions are tantamount to a rape and plundering of the land, as well as despoiling the quality life of people who live and work in this community.

00483

3714 State Highway 24
Campbell TX 75422

NORTH TEXAS TX 750

RECEIVED
SEP 26 2022
TCEQ MAIL CENTER
JR

FIRST-CLASS

PITNEY BOWES

US POSTAGE
02 7H
0001343399
$ 000.84⁰
SEP 23 2022
MAILED FROM ZIP CODE 75422

Office of the Chief Clerk, MC 105
TCEQ
Austin, Texas
78711-3087

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 SEP 26 AM 10:16
CHIEF CLERKS OFFICE

78711-308787

MSW
125147

I AM AN "AFFECTED PARTY" – that has a personal justiciable interest related to a legal right, duty, privilege, power or economic interest affected by the application.

PERMIT: 2411 SOLID WASTE TRANSFER FACILITY – STATE HIGHWAY 24 – CAMPBELL, TEXAS

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 SEP 26 AM 10:16
CHIEF CLERKS OFFICE

NAME: Joe V. Mabry

ADDRESS: 3696 Hwy 24
Campbell, Tx 75422

TELEPHONE: 903-456-8811

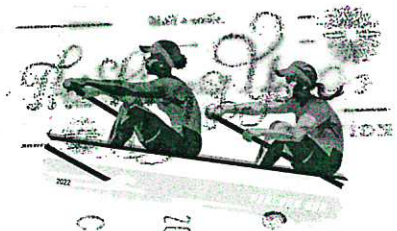
REVIEWED
SEP 27 2022
By GCW H

I want a contested case Hearing.

Joe V. Mabry

00485

3696 State Highway 24
Campbell TX 75422



NORTH TEXAS TX P&DC
DALLAS TX 750
23 SEP 2022 PM 6 L

RECEIVED
SEP 26 2022
TCEQ MAIL CENTER
JR

2022 SEP 23 AM 10:16
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
CHIEF CLERKS OFFICE

Office of the Chief Clerk, MC105
TCEQ
Austin TX 78711-3087

78711-308787

MSW
125147

I AM AN "AFFECTED PARTY" – that has a personal justiciable interest related to a legal right, duty, privilege, power or economic interest affected by the application.

PERMIT: 2411 SOLID WASTE TRANSFER FACILITY – STATE HIGHWAY 24 – CAMPBELL, TEXAS

NAME: Jon Manning

ADDRESS: 3440 HWY 24
Campbell, TX 75422
(Hunt County Animal Hospital)

TELEPHONE: 903-886-3911

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 SEP 26 AM 10:16
CHIEF CLERKS OFFICE

SEP 27 2022
By: GCW

J B, DVM

00487

3440 State Highway 24
Campbell, Tx 75422

NORTH TEXAS TX P&DC
DALLAS TX 750
23 SEP 2022 PM 8 L

RECEIVED
SEP 26 2022
TCEQ MAIL CENTER
JR



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 SEP 26 PM 10:16
CHIEF CLERKS OFFICE

Office of the Chief Clerk, MC 105
TCEQ
Austin, Texas
78711-3087

78711-308787

MSW
125147

I AM AN "AFFECTED PARTY" – that has a personal justiciable interest related to a legal right, duty, privilege, power or economic interest affected by the application.

PERMIT: 2411 SOLID WASTE TRANSFER FACILITY – STATE HIGHWAY 24 – CAMPBELL, TEXAS

NAME: Bonnie S. Mabry

ADDRESS: 3696 Hwy 24
Campbell, Tx 75422

RECEIVED
SEP 27 2022
By GCW

TELEPHONE: 817-229-5563

I want a contested case hearing.

Bonnie S. Mabry

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 SEP 26 AM 10:16
CHIEF CLERKS OFFICE

00489

3714 State Highway 24
Campbell Tx 75422

RECEIVED
SEP 26 2022
TCEQ MAIL CENTER
JR

NORTH TEXAS TX P&DC
DALLAS TX 750
23 SEP 2022 PM 2 L



Office of the Chief Clerk, MC 105
TCEQ
Austin, TX 78711-3087

CHIEF CLERKS OFFICE
2022 SEP 26 AM 10: 16
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

78711-3087

MSW
125147

I Request a Contested Case Hearing

I AM AN "AFFECTED PARTY" – that has a personal justiciable interest related to a legal right, duty, privilege, power or economic interest affected by the application.

PERMIT: 2411 SOLID WASTE TRANSFER FACILITY – STATE HIGHWAY 24 – CAMPBELL, TEXAS

NAME: DAVID Giles

ADDRESS: 3714 State Highway 24
Campbell TX 75422

TELEPHONE: 817-366-2026

REVIEWED
OCT 04 2022
By GC3 H

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 OCT -3 AM 11:04
CHIEF CLERKS OFFICE

Also Cathy Giles
3714 State Highway 24
Campbell TX 75422
817-946-2815

3714 State Highway 24
Campbell TX 75422

RECEIVED
OCT 03 2022
TCEQ MAIL CENTER
AJ

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

2022 OCT -3 AM 10:53

CHIEF CLERKS OFFICE



Office of the Chief Clerk, MC 105
TCEQ
Austin, TX 78711-3087

78711$3087 B012

00491

WDW423 & WDW424
119588

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Tuesday, September 27, 2022 2:14 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Subject: FW: Public comment on Permit Number WDW423
Attachments: Request for Reconsideration - Goliad County Groundwater Conservation District3.pdf

RFR
PM

From: gcgcd@goliadcogcd.org <gcgcd@goliadcogcd.org>
Sent: Tuesday, September 27, 2022 10:22 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WDW423

REGULATED ENTY NAME GOLIAD PROJECT

RN NUMBER: RN105304802

PERMIT NUMBER: WDW423

DOCKET NUMBER:

COUNTY: GOLIAD

PRINCIPAL NAME: URANIUM ENERGY CORP

CN NUMBER: CN603228461

FROM

NAME: Annalysa Camacho

EMAIL: gcgcd@goliadcogcd.org

COMPANY: Goliad County Groundwater Conservation District

ADDRESS: PO BOX 562
GOLIAD TX 77963-0562

PHONE: 3616451716

FAX:

COMMENTS: Please open the attached file Request for Reconsideration for Permit Nos: WDW423 and WDW424.

WDW423 WDW424
119588

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Wednesday, October 5, 2022 9:15 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WPD
Cc: Laurie Gharis; Deornette Monteleone
Subject: FW: Goliad Groundwater District Public Hearing Request
Attachments: EXEC 48433 Senator Kolkhorst request for public hearing - Goliad GWD.pdf

PM

From: Laurie Gharis <Laurie.Gharis@tceq.texas.gov>
Sent: Tuesday, October 4, 2022 1:04 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: Goliad Groundwater District Public Hearing Request

Laurie Gharis
Office of the Chief Clerk
Texas Commission on Environmental Quality
Office Phone: 512-239-1835
Cell Phone: 512-739-4582

How is our customer service? Fill out our online customer satisfaction survey at:
www.tceq.texas.gov/customersurvey

From: Dennise Braeutigam <Dennise.Braeutigam@tceq.texas.gov>
Sent: Tuesday, October 4, 2022 12:16 PM
To: Laurie Gharis <Laurie.Gharis@tceq.texas.gov>
Cc: Deornette Monteleone <Deornette.Monteleone@tceq.texas.gov>
Subject: FW: Goliad Groundwater District Public Hearing Request

Good afternoon,
Please let me know if you want to provide draft response or if you want us to reach out to the program?
Thank you,
Dennise

Dennise Braeutigam
Office Manager for Executive Office
Texas Commission on Environmental Quality
512-239-0598

EXEC 48433

COMMITTEES:
HEALTH & HUMAN SERVICES, CHAIR
FINANCE
NATURAL RESOURCES & ECONOMIC DEVELOPMENT
TRANSPORTATION
WATER, AGRICULTURE & RURAL AFFAIRS

THE SENATE OF TEXAS



LOIS W. KOLKHORST
STATE SENATOR
DISTRICT 18

September 30, 2022

Honorable Toby Baker
Executive Director
Texas Commission on Environmental Quality
12100 Park 35 Cir
Austin, Texas 78753

Re: Goliad Groundwater District Public Hearing Request

Honorable Toby Baker,

I am respectfully requesting that your office grant a public hearing for permit numbers WDW 423 and WDW 424.

The Goliad Groundwater District wants to give the public an opportunity to hear more about these permits and to provide as much transparency as possible. It is our hope that these public hearings can be accommodated and held in Goliad.

Please let me know if I can be of further assistance.

Sincerely,

Senator Lois W. Kolkhorst
Texas Senate District 18

RECEIVED
OCT 03 2022
EXECUTIVE OFFICE

CAPITOL OFFICE:
GE.4 • P.O. BOX 12068
AUSTIN, TEXAS 78711
P: (512) 463-0118
F: (512) 475-3736

FORT BEND DISTRICT OFFICE:
22310 GRAND CORNER DR., SUITE 120
KATY, TEXAS 77494
P: (281) 394-5610
F: (281) 394-5520

CENTRAL DISTRICT OFFICE:
2000 S. MARKET ST. #101
BRENHAM, TEXAS 77833
P: (979) 251-7888
F: (979) 251-7968

SOUTHERN DISTRICT OFFICE:
5606 NORTH NAVARRO #300M
VICTORIA, TEXAS 77904
P: (361) 573-7300
F: (361) 573-7307

THE SENATE OF TEXAS
LOIS W. KOLKHORST
DISTRICT 18
P.O. BOX 12068
AUSTIN, TEXAS 78711

RECEIVED
OCT 03 2022
EXECUTIVE OFFICE

INTERAGENCY
RECEIVED
OCT 03 2022
TCEQ MAIL CENTER
DA

Honorable Toby Baker
Executive Director
Texas Commission on Environmental Quality
12100 Park 35 Cir
Austin, Texas 78753

MSW
125147

Since 1889

September 23, 2022

Laurie Gharis
Chief Clerk
TCEQ, MC-105
P.O. Box 13087
Austin, TX 78711

REVIEWED
SEP 27 2022
By GCW

RFR
H

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2022 SEP 26 PM 2:52
CHIEF CLERKS OFFICE

RE: Request for Reconsideration and a Contested Case Hearing
Highway 24 Transfer Station
Applicant: Transfer Station Solutions, LLC
MSW Permit No. 2411

Dear Chief Clerk Gharis:

Texas A&M University-Commerce ("TAMUC") writes to request reconsideration by the Texas Commission on Environmental Quality ("TCEQ") and a Contested Case Hearing on the above-referenced application. TAMUC disagrees with the decision rendered by TCEQ's Executive Director ("ED") and his Response to Public Comment ("RTC") filed on August 24, 2022, regarding Permit No. 2411. As TAMUC explained in its public comments, TAMUC is an "affected person"[1] as defined under TCEQ's rules, respectfully requests reconsideration of the ED's decision,[2] and requests a hearing on the merits so that it may present facts and evidence in support of its opposition to the application submitted to TCEQ by Transfer Station Solutions, LLC.[3] TAMUC also provides its request for reconsideration of the ED's recommendation and corresponding responses to the ED's RTC below. TAMUC has repeatedly expressed its opposition to the proposed transfer station and provides its prior written communications to the Commission as **Attachments A & B,** hereto which are incorporated herein by reference and are the basis for TAMUC's hearing request.

I. Request for Reconsideration of Executive Director's Decision

TAMUC has reviewed the ED's decision, disputes that decision, and requests reconsideration[4] of that decision on the following grounds:

1. **Comment 1: Location of Public Meeting** – TAMUC respectfully requests that the ED reconsider its response to Comment 1 because it fails to thoroughly assess 30 TAC § 55.154(c). The ED has the authority to require multiple public meetings. Due to the inability of the TAMUC student body to participate in a meeting 20 miles from the

[1] 30 TAC § 55.203. TAMUC, as a higher educational institution, has an interest in performing its mission to educate the students of the State of Texas; is located across the highway from the proposed transfer station location; its operations and research will be affected by noise, traffic, odors, litter, and storm water runoff from the transfer station operations; seeks to keep its livestock and farm offerings free from interference by activities being proposed in the application; will be impacted if this proposed transfer station is approved; and owns agricultural property that will be impacted by the transfer station operations.
[2] 30 TAC § 55.201(b)(4) and (e). *See also* § 55.203.
[3] 30 TAC § 55.103. Affected person--A person 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. The determination of whether a person is affected shall be governed by § 55.203 of this title (relating to Determination of Affected Person), or, if applicable under § 55.256 of this title (relating to Determination of Affected Person).
[4] *See* 30 TAC § 55.201(e).

HB: 4861-2945-2596.1

Office of the President
P. O. Box 3011 • Commerce, TX 75429-3011 • Phone: 903.886.5014 • Fax: 903.886.5010 • www.tamuc.edu
A Member of The Texas A&M University System

location of the university and the proposed transfer station location, holding another public meeting that the TAMUC student body may more easily attend is necessary, proper, and may be hosted on the TAMUC campus at no cost to TCEQ or the applicant. TAMUC student body participation is critical so that TCEQ can ensure that the views of the students who would be most affected by the proposed transfer station may be heard and their views included in the record. The ED has the authority to call more than one meeting per the language in 30 TAC § 55.156(b)(2).

2. **Comment 2: Agency Should See the Site and Surroundings** – TAMUC respectfully requests that the ED reconsider its recommendation because the ED's response to Comment 2 is vague, and it is unclear what meaningful observations of the area surrounding the location of the proposed transfer station were made by TCEQ Staff. TAMUC requests that the ED provide a more thorough and detailed explanation of TCEQ Staff's observations so that the basis for the ED's decision and any information related to Staff's visit may be known and better understood.
3. **Comment 5: Application Review** – TAMUC respectfully requests that the ED reconsider its recommendation based on the totality of the circumstances and the impact that approving the application will have on the surrounding community. The ED's recommendation should specifically raise for the Commission the potential and particular impacts approving the transfer station might have on the community, including the TAMUC's existing research and educational facilities adjacent to this proposed transfer station. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
4. **Comment 12: Traffic and Roads** – TAMUC respectfully requests that the ED reconsider its recommendation based on information imparted at the public meeting about TAMUC's ongoing meetings with TxDOT since at least 2019 concerning numerous dangerous traffic conditions within less than one mile from the site of the proposed transfer station. Specifically, TAMUC requests that the ED address with TxDOT how the simultaneous use of the highway in the immediate vicinity of the proposed transfer station by large trash and sand trucks, TAMUC staff and students, and the general public, will not create a dangerous situation requiring at a minimum roadway modifications and improvements. TAMUC requests that the ED specifically discuss this evidence and information with TxDOT, that TxDOT provide written feedback to the ED based on TAMUC's and other affected persons' concerns, and that the ED take this written feedback into account as part of his reconsideration.
5. **Comment 13: Negative Impact on Community, Including Future Development** – TAMUC respectfully requests that the ED reconsider its recommendation by assessing 30 TAC § 330.61(h), which specifically directs TCEQ to assess the impact on the surrounding area, particularly "other factors associated with the public interest." TAMUC requests that the ED consider the impacts that approving the application might have on TAMUC and its mission to provide educational services and programs and the public's interest in assuring that those educational services and programs are not negatively impacted. TAMUC also requests that the ED state for the record his position that the approval of the transfer station is consistent with the public interest and is consistent with the uses of the surrounding area. TAMUC is deeply concerned that the presence of a trash processing facility in such close proximity to its farm and livestock offerings will chill its ability to maintain and grow these offerings immediately and

over time because of the threat that a waste facility poses to farm and livestock operations, testing, and research.

6. **Comment 15: Land-use Compatibility** – TAMUC respectfully requests that the ED state for the record his assessment of the potential impact that approving the proposed transfer station might have on the surrounding area and explain how the transfer station is compatible with surrounding area land uses. The application does not assess the impact of the facility on TAMUC, its farm and livestock offerings, programs, research, ability to draw funds to support those programs due to the threat posed by the proposed transfer station, and ability to retain and recruit talent for those programs. Further, the ED's analysis should go beyond the information that the applicant provided and include a detailed analysis of how other land uses might be impacted, which the ED fails to do in its recommendation. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
7. **Comment 16: Texas Parks and Wildlife Department (TPWD) Recommendations** – TAMUC respectfully requests that the ED explain how it determined that livestock would not be impacted when TAMUC has provided information explaining how the proposed transfer station would impact its livestock and educational offerings related to livestock. TAMUC also requests that the ED engage with TAMUC's livestock professionals and other third-party livestock professionals to better understand those impacts and explain in its subsequent recommendation how despite TAMUC's assessment of impacts to livestock from the proposed transfer station, the ED nevertheless recommends approval. Further, TAMUC respectfully requests that the ED provide evidence from TPWD that it has assessed TAMUC's concerns and provide evidence in writing of the ED consulting with TPWD.
8. **Comment 18: Effects on Texas A&M University-Commerce and Related Activities** – TAMUC respectfully requests that the ED provide a thorough assessment of the impact that the proposed transfer station might have based on "information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest" pursuant to 30 TAC § 330.61(h). The ED did not provide such analysis in its initial recommendation and requests that the ED thoroughly review the compatibility of the transfer station on the surrounding land use, as requested by numerous commenters during the public comment period.
9. **Comment 19: Location** – TAMUC respectfully requests that the ED specifically consult the North Central Texas Council of Governments (NCTCOG) or at least provide evidence that it has examined NCTCOG's new Regional Solid Waste Management Plan to ensure that the proposed transfer station is consistent with the updated plan. TAMUC also requests that the ED provide evidence that NCTCOG has considered the proposed transfer station in light of the updated NCTCOG plan, community feedback at the public meeting, and Hunt County solid waste ordinance, as part of the ED's reconsideration of his recommendation.
10. **Comment 23: Waste Acceptance, Including Sources of Waste** – TAMUC respectfully requests that the ED reconsider its recommendation because the applicant has not sufficiently detailed how it intends to screen and identify any wastes that are not acceptable at a Class V municipal solid waste facility nor has the applicant

sufficiently detailed measures the applicant intends to implement should any unacceptable wastes be identified.[5] TAMUC requests that the ED require the applicant to expressly state how it will manage such circumstances and how it will protect against inadvertently accepting such wastes.

11. **Comment 25: Local Ordinance Issued December 28, 2021** – TAMUC respectfully requests that the ED thoroughly explain how the community opposition to the proposed transfer station, which it has expressed through its local elected county representatives, is insufficient to find that the approval of the proposed transfer station is nevertheless still consistent with uses of the community and the surrounding area. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
12. **Comment 27: Noise** – TAMUC respectfully requests that the ED reconsider its recommendation based on the information provided to TCEQ in TAMUC's response to Comment 27 of the ED's RTC provided below. Specifically, the ED should also explain why in its determination the proposed transfer station and the nature of the resulting traffic do not endanger the aforementioned parties, including the impact of sudden noises and effects of those noises on animals, as was explained by Dr. Mumm and Dr. Harp during public comment.[6]
13. **Comment 28: Contaminated Water Management** – TAMUC respectfully requests that the ED reconsider its determination because of the potential for a large fire to occur and for the amount of the refuse water to exceed the capacity of the proposed transfer station to store the excess amount of water. The ED should consult with local firefighting professionals to quantify how much water might be necessary to put out a fire and whether the tanks at the transfer station are sufficient to contain that quantity of contaminated water. The ED should also address the implications and remedial actions that would be necessary in such an event and expressly explain why its recommendation is sufficient should such an event occur, including by addressing any impacts or potential impacts to surface waters.
14. **Comment 29: Surface Water** – TAMUC respectfully requests that the ED reconsider its recommendation and directs TCEQ to see its response to Comment 28.
15. **Comment 30: Groundwater, Drinking Water, and Aquifer Protection** – TAMUC respectfully requests that the ED reconsider its recommendation by considering requiring that the applicant install and maintain monitoring wells and agree to periodic testing, the results of which would be shared with affected parties, for purposes of ensuring that the aquifer and any nearby waters are protected now and over time as part of its reconsidered recommendation. Due to the shallow local aquifer and nearby surface waters, the ED's response should explain why monitoring wells are not necessary under these unique circumstances (shallow water table and nearby water sources) beyond stating that they are not required under TCEQ's rules.
16. **Comment 33: No Citizen's Collection Station (CCS)** – TAMUC respectfully requests that the ED reconsider its recommendation based on the applicant's representations at the public meeting on this issue and for the ED to require the applicant to manage and control any allowed CCS, including by providing detailed written processes and procedures by the applicant for dealing with any escaped refuse

[5] *See* 30 TAC § 330.103(5).
[6] *See* 30 TAC § 330.239.

as a result of the CCS if the proposed transfer station application is approved.[7] TAMUC and others should be allowed to monitor and verify these processes and procedures. Alternatively, the ED should require the applicant to confirm that no CCS will be allowed.

17. **Comment 35: Odor, Dust, Vapors, Methane, and Effect on Air Quality** – TAMUC respectfully requests that the ED reconsider its recommendation with respect to odor, dust, vapors, methane, and air quality, which can have an immediate impact on TAMUC's livestock programs and the animals that are part of those programs. Under the circumstances, the proximity of the transfer station to TAMUC's research farm and the constant animal presence, TAMUC believes that greater protections are necessary and a more immediate response mechanism is proper beyond providing a hotline number. TAMUC requests that the ED specifically address as part of its reconsideration why in his estimation additional protective measures are unnecessary and why the hotline number is sufficient under these specific circumstances.
18. **Comment 36: Odor Control Chemicals** – TAMUC respectfully requests that the ED reconsider its recommendation consistent with TAMUC's response to Comment 35 above.
19. **Comment 37: Vectors** – TAMUC respectfully requests that the ED reconsider its recommendation because of the acute threat that vectors would have on TAMUC's farm and livestock programs if the proposed transfer station is permitted. Specifically, the proposed protections will not sufficiently protect TAMUC's programs and animals. A hotline number is insufficient to provide a timely and effective response to the presence of various potential vectors that may contain diseases, including but not limited to rodents, fleas, flying pests, mites, etc., that may be challenging to timely identify and source. The ED should address this concern by discussing the application of TCEQ rules to his assessment.[8]
20. **Comment 38: Windblown Waste and Waste on Roads** – TAMUC respectfully requests that the ED reconsider its recommendation because ensuring that the trucks are covered is insufficient to protect the university's livestock from trash that escapes from the proposed transfer station facility. This is especially true if members of the community are allowed to utilize the facility because there will be another source of trash present that the applicant must be responsible for if TAMUC's livestock are to be protected. The ED's recommendation should include not only what the TCEQ rules require but also what makes sense due to the uses of the surrounding area. A hotline number to report nuisances is insufficient because when trash escapes from the facility, prior to arriving at the facility, or when being transported from the facility, that trash poses an immediate threat to TAMUC's farm and livestock programs and immediate action is necessary to eliminate the threat. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
21. **Comment 39: Operating Hours** – TAMUC respectfully requests that the ED reconsider his recommendation because TAMUC and others have provided clear information explaining how the operating hours proposed by the applicant will disrupt TAMUC's livestock programs and research as well as coincide with heavy use by the campus community. If the proposed transfer station is approved, the ED should

[7] *See* 30 TAC § 330.213.
[8] *See* 30 TAC § 330.7 (8) & (9).

consider requiring the applicant to begin utilizing the transfer station no earlier than 10AM and for operations to cease at 4PM, after students, faculty, and staff, and others have safely arrived at or departed from the university without having to navigate the presence of the large trash trucks associated with the transfer station. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.

22. **Comment 40: Fire, Firefighting Activities, and Volunteer Fire Department** – TAMUC respectfully requests that the ED reconsider its recommendation due to the unique nature of the surrounding area and consult the local fire marshal and local fire department(s) to confirm that the fire plan required under TCEQ rules sufficiently meets the needs of the local firefighting community. Further, the plan should also ensure that TAMUC and local residents are protected from fire threats.
23. **Comment 41: Dumping Outside Transfer Building** – TAMUC respectfully requests that the ED reconsider its recommendation in light of the fact that the applicant intends to allow members of the public to utilize the transfer station. The ED should explain specifically which measures that the applicant would be required to implement and maintain to prevent trash from being dumped outside of the facility. For example, if a member of the public arrives at the facility when it is closed, what will prevent the member of the public from leaving their trash, even if they are not supposed to do so, outside of the facility? This is a concern of TAMUC because leaving trash of unknown quality and character outside of the facility would pose a threat to TAMUC's farm and livestock programs.
24. **Comment 42: Visual Damage to Community** – TAMUC respectfully requests that the ED reconsider its recommendation by responding to the substance of the concerns regarding the visual impact that approving the transfer station would have on the surrounding area. The applicant has verbally agreed to install trees and fences to mitigate the ability of others to see the transfer station. The ED should require these details to be included in the application and approved permit if the transfer station is ultimately approved.
25. **Comment 43: 72-hour Waste Storage** – TAMUC respectfully requests that the ED reconsider its recommendation not only based on the applicable rule but based on practicality. TAMUC hosts large scale and heavily attended events that begin on Fridays during the summer and end the following week. During summer months, the Texas heat is certain to cause increased odors by decomposing the contents held within the transfer station. Because winds blow in the direction of TAMUC from the transfer station, it is certain that odors will impact TAMUC's events. While TAMUC appreciates the ED's provision of a hotline number in such events, it is unlikely that calling the hotline number on a hot Texas-summer Saturday will result in abatement of any nuisance caused by the transfer station until the following week—which could severely tarnish TAMUC events. TAMUC requests that the ED thoroughly address this circumstance and how it will be mitigated as a condition of approval if the proposed transfer station is ultimately approved. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.
26. **Comment 45: Communities Served** – TAMUC respectfully requests that the ED reconsider its recommendation by clearly and thoroughly explaining why a transfer station of this size is necessary given the needs of the community. The ED should consider recommending the approval of a smaller facility that actually meets the area's

needs. The ED should address the requirements of 30 TAC § 330.61(h), as part of its reconsideration.

II. Response to ED's Responses to Public Comments (RTC)

TAMUC disputes the following responses to the RTC by the ED and provides the following for consideration. For convenience, TAMUC provides the initial comment, the ED's response, and TAMUC's response to the ED's response.

Comment 1: Location of Public Meeting

Travis Ball, Nicolas Scott noted that the public meeting was held 20 miles away from the location for the proposed transfer station and indicated that this led to inadequate participation, particularly from students at Texas A&M University-Commerce, which has a facility located roughly across the highway from the proposed location.

ED Response 1:

TCEQ's rules regarding public meetings require that a public meeting be held in the county in which the facility is proposed to be located, but the rules do not set a limit for the distance a public meeting venue may be from the proposed location under consideration at that meeting. The Executive Director does not have the authority to require the applicant to hold a meeting at a specific venue, such as those at the university property.

TAMUC's Response to ED's Response to Comment 1: TAMUC contends that the applicant deliberately opted to hold the public meeting as far away from the TAMUC campus in Commerce as possible and still be within Hunt County to prevent TAMUC students from publicly expressing their opposition to the proposed transfer station. Only two (2) students from TAMUC were able to attend the public meeting despite large numbers of students expressing interest in and opposition to the application. TAMUC believes that the students should be afforded the opportunity to participate in the public forum and is willing to host a public meeting on campus so that the students who are impacted by the proposed transfer station may have their concerns added to the record. The very rule cited by the ED in the RTC explicitly states, "[a]t any time, the executive director or the Office of the Chief Clerk may hold public meetings," meaning that while the ED may not be able to determine the location of a public meeting, the ED does have the authority to hold multiple public meetings.[9] Further, as is evidenced in Comment 2, below, the ED may decide to take actions not required under TCEQ rules such as directing TCEQ Staff to visit a site. Under the circumstances, TAMUC requests that TCEQ hold another public meeting and ensure that this meeting is more accessible to TAMUC students and local residents, who would be impacted if the transfer station is approved.

Comment 2. Agency Should See the Site and Surroundings

[9] 30 TAC § 55.154(c).

Randy Harp suggested that agency staff should see the proposed site and surroundings before issuing a permit.

ED's Response 2:

The MSW rules do not require the Executive Director's staff visit a proposed location of a transfer station before issuing a permit. Staff took the opportunity to see the proposed location and survey the surrounding community before the public meeting held on April 28, 2022.

TAMUC's Response to Comment 2: The ED's response to Comment 2 is vague. It is unclear what is meant by "took the opportunity to see the proposed location and survey the surrounding community." TAMUC respectfully requests that the ED provide detailed information about TCEQ's visit to the location and what is meant by "survey" so the public may understand the details evaluated by TCEQ Staff for purposes of better understanding the basis of the ED's decision. TAMUC is concerned that TCEQ did not adequately examine the surrounding area while performing its "survey" or learn about the various impacts to affected persons such as TAMUC. While the rules may not require TCEQ Staff to visit a site, when a facility like a transfer station is proposed along a major highway located directly across from a university, at minimum, a site visit and engagement with various stakeholders is prudent. TAMUC is glad to facilitate a tour of the area to help TCEQ better understand and visualize the impacts that the transfer station would have on its operations if the application is approved.

Comment 5: Application Review

Christopher Jeremy Brecheisen, David Alan Giles, and Jonathan Manning criticized the review process, suggesting that applications are "rubber-stamped" and noted that the engineer at the public meeting representing the Executive Director, indicated that 100% of applications he had reviewed were approved. Travis Ball, Jonathan Manning suggested that the review process is for show and asked how many applications have been denied recently. Christopher Jeremy Brecheisen asked if the TCEQ can be stricter than the United States Environmental Protection Agency (USEPA) and if so, requested examples. Christopher Jeremy Brecheisen further indicated that the applicant failed to meet federal Resource Conservation and Recovery Act (RCRA) requirements for a pre-application meeting with the community.

ED's Response 5:

The Executive Director performs a through and objective review of all applications. The Commission hires Professional Engineers, Professional Geologists, and Environmental Specialists to review incoming MSW applications, reports, notifications, and other submittals. This Application was reviewed by Mr. Odil, a Professional Engineer and has been with the Commission over 18 years. He reviewed the application thoroughly and objectively, like all applications reviewed by the Executive Director's staff. Application reviews are conducted to identify all deficiencies and follow established procedures to help ensure all rule requirements are met for an administratively and technically complete application.

At the public meeting, Mr. Odil noted that 100% of applications he has reviewed have been issued, however, he was referring only to applications that were determined to be technically complete. Other MSW applications reviewed by Mr. Odil did not reach technical completion and were withdrawn. Reasons for withdrawal by an applicant vary but include unsatisfactory responses to issues identified by the Executive Director's staff. In the last five years, the MSW Permits Section issued approximately 80 new permits, permit amendments, and limited-scope permit amendments. During the same period, ten applications were withdrawn and one was returned.

TCEQ rules can be more restrictive than federal rules. Texas has authority from the USEPA to regulate these facilities under its rules, so the state program is expected to meet or exceed the federal program. Examples of where the TCEQ rules are more prescriptive include, but not limited to, approvals from other governmental entities when MSW activities may potentially impact items in their purview, like Texas Department of Transportation for road suitability, Texas Historical Commission for compliance with the Texas Antiquities Code, and Federal Emergency Management Agency for 100-year floodplain impacts; buffer and easement restrictions; surrounding land-use data; and website requirements. Pre-application meetings with the community are optional under 30 TAC Chapter 330.

TAMUC's Response to Comment 5: The ED's response to Comment 5 only further establishes that TCEQ's approval of transfer station applications is essentially automatic. As long as an application is deemed "complete" by TCEQ staff and the ED, it will be approved. The extent of TCEQ's review and the review by professionals TCEQ tasks with assisting that review has become ministerial. TAMUC believes its students and the public deserve a less mechanical determination—especially when so many affected parties are involved. Just because an applicant can provide the requested information should not determine whether approval is correct and proper without assessing the totality of the circumstances and how the transfer station will meet the regulatory criteria. In other words, the process described by the ED reflects attention to the gathering of information and inattention to the implications of the information gathered and the project that is ultimately approved. The requirements of 30 TAC § 330.61(h), must be assessed as part of the review process.

Comment 12: Traffic and Roads

Amanda Adams, Robin Alexander, Janet Anderson, Christy Andrzejewski, Christopher Babb, Travis Ball, Billy Rhea Beane, Cathy Beane, Michael Beane, Michele Benjamin, Jimmy Babb, Dave Bickley, Jay Boshart, Amy Braley, Christopher Jeremy Brecheisen, James Brown, Karla Burke, Daniel Clark, Ted Ray Crim, Jeffrey Cross, Sean Dawson, Amanda Delisle, Ethan Elmore, Patrick Etie, Lory Foster, Daryl Wayne Freelen, Diana Fults, Stephen Gilcrest, David Alan Giles, Raymond Green, Connie Hale, Brett Harmon, Bunny Harmon, Randy Harp, Richard Helge, Anna Knutson, Susan Lousberg, Jonathan Manning, Ronald Manning, Barba McCord, Joe McCracken, Dustin McNeese, Mary Miller, Vickie Mize, Jessie Moore, Denise Morgan, Crystal Mumphrey, Kayla Price, Brad Rabe, Mark Rudin, Amanda Scott, Alison Soeder, Daniel Starks, Karen Starks, Bobby Stovall, Janis Stroope, Lynn Sutherland, Robert Sutherland, Texas A&M University-Commerce Student Government Association, Elizabeth Tarrant, Kevin Tibboel, Cyrus Vaughan, and Jill Wickersham shared concerns over traffic on Highway 24 in the vicinity of the proposed transfer station. Tammy Colclasure, Kelly Kuehl, and Jessie Moore indicated that the associated

traffic would damage roads. Kelly Kuehl was concerned that this damage would cause an increase in taxes. Janis Stroope felt that a waste facility would be disrespectful to the Flying Tiger Memorial Highway. Jessie Moore asked questions about which towns will have contracts and what roads will be used to bring trash to the proposed facility.

ED's Response 12:

In accordance with 30 TAC § 330.61(i), an Application for an MSW transfer station permit must include data on access roads for the proposed facility, including: availability and adequacy of roads that the owner or operator will use to access the site; volume of vehicular traffic on access roads within one mile of the proposed facility, both existing and expected, during the expected life of the facility; and projections on the volume of traffic expected to be generated by the facility on the access roads within one mile of the proposed facility. This information is provided in Parts I/II, Section 3.2 of the Application. Section 3.2.2 states that State Highway 24 is adequate to handle total projected volumes throughout the expected life of the facility.

When reviewing permit applications, the Executive Director defers to the Texas Department of Transportation (TxDOT) recommendations on traffic issues and the adequacy of state-maintained roadways to be used by a proposed MSW facility. Documentation of coordination with TxDOT, required under 30 TAC § 330.61(i)(4), is provided in Parts I/II, Appendix I/II-A.3 of the Application. As documented in the Application, TxDOT did not require road improvements in the vicinity of the proposed location.

The Executive Director is not authorized to consider the effect that a proposed facility will have on road maintenance or on taxes to address it. Nor is there any prohibition to locating MSW facilities along memorial highways. Other questions regarding contracts and traffic details beyond the scope described above are outside the authorization of the Executive Director.

TAMUC's Response to Comment 12: TAMUC believes that TxDOT should be further engaged to discuss the unique nature of the traffic in the area where the transfer station is proposed to be located. TAMUC has had prior and ongoing discussion with TxDOT about safety issues in this area since at least 2019. TxDOT has determined it is necessary to implement additional safety measures along this exact stretch of highway upon more detailed review after TxDOT initially determined additional safety measures were not necessary. If the transfer station is approved, large numbers of students and high volumes of trucks moving at highly varying speeds (the speed limit in this area is 75 mph) will utilize the same section of highway located between the transfer station and TAMUC campus at the same time of day and will likely, and in TAMUC's experience, certainly lead to unnecessary and dangerous situations. In addition, these sanitation trucks and students will be preforming turn maneuvers in the same cross-over area to reach their respective facilities as the transfer station and TAMUC students utilize the same intersection. There are already dangerous situations created by the trucks entering and exiting the sandpit facility, which is essentially collocated with the proposed transfer station. Further, TAMUC has already alerted TxDOT and the Texas Legislature of existing traffic issues within less than one mile of the proposed transfer station. In this case, TAMUC is certain more information and analysis of traffic patterns is critical beyond just the volume of traffic and the capability of Highway 24 to handle that volume. Further, the ED did not coordinate with TxDOT as is required under 30 TAC §

330.23(a) because no design capacity to account for the large size and volume of trucks and the simultaneous high-volume use by TAMUC students, faculty, and staff has been provided. TAMUC has engaged with TxDOT and the agency is prepared to consider additional information. TAMUC respectfully requests that the ED specifically coordinate with TxDOT on this issue and provide meaningful and substantive feedback in a supplemental response to this comment.

Comment 13: Negative Impact on Community, Including Future Development

Amanda Adams, Robin Alexander, Christopher Babb, Yumei Bao, Michael Beane, Dave Bickley, Tami Bishop, Amy Braley, Christopher Jeremy Brecheisen, James Brown, Ashley Bryan, Karla Burke, Cathy Certain, Courtney Clanton, Ted Ray Crim, Ethan Elmore, Steven Ford, Lory Foster, Noah Garcia, David Alan Giles, Connie Hale, Randy Harp, Cody Helm, Sarah Helm, Anna Knutson, Joan Lambert, Alyssa Logston, Jonathan Manning, Liz Medina, Crystal Mumphrey, Kayla Price, Cynthia Ross, Nicholas Scott, Michael Stark, Daniel Starks, Lynn Sutherland, Elizabeth Tarrant, Kevin Tibboel, and Ashley Whitmore were concerned that the proposed facility would have a negative impact on their community, including future growth and development.

ED's Response 13:

The TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. Accordingly, the TCEQ does not have jurisdiction to consider economic impacts, such as impacts to livelihoods, on surrounding areas when determining whether to approve or deny a permit application. Growth trends are discussed in Parts I/II, Section 2.4.3 of the Application. The discussion was based primarily on communication with Hunt County, which indicated that there were no plats for development within five miles of the transfer station as of November 2021. The ground survey of the area discussed in the Application did not reveal any growth trends or direction of major development within five miles of the proposed location. The Executive Director has determined that adequate information on growth trends was provided in the Application.

TAMUC's Response to Comment 13: The scope through which TCEQ interprets its own rules is too narrow to be useful given the nature of the area surrounding the location of the proposed transfer station and ignores 30 TAC § 330.61(h), which specifically directs TCEQ to assess the impact on the surrounding area, particularly "other factors associated with the public interest." In this case, TAMUC contends that the public interest of TAMUC and its mission to provide educational services and programs must be weighed with the public interest associated with a transfer station. Here, the applicant provided TCEQ with what the application requires. However, that does not indicate that the use of the transfer station is consistent with the uses of the surrounding area. TAMUC requests that the ED provide substantive and meaningful feedback in its response to this comment.

Comment 15: Land-use Compatibility

Amanda Adams, Janet Anderson, Christopher Babb, Travis Ball, Dave Bickley, Kathryn Brandt, Christopher Jeremy Brecheisen, James Brown, Cathy Certain, Daniel Clark, Ted Ray Crim, Amanda Delisle, Patrick Etie, Lory Foster, Daryl Wayne Freelen, Raymond Green, Connie Hale,

Anna Knutson, Joan Lambert, Leslee Lay, Barba McCord, Kayla Price, Brad Rabe, Mark Rudin, Amanda Scott, Michael Starks, Daniel Starks, Lynn Sutherland, Keith Tarrant, Reabeccah Tarrant, Cyrus Vaughan, and Vickie Wood indicated that the proposed facility was incompatible with the community where it would be located.

ED's Response 15:

Applicants for transfer stations must provide information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest. Specifically, an applicant must provide information, including an available published zoning map for the facility and within two miles of the facility for the county or counties in which the facility will be located; information about the character of the surrounding land uses within one mile of the proposed facility; information about growth trends within five miles of the facility with directions of major development; information on the proximity of the facility to residences, business establishments, and other uses within one mile, such as schools, churches, cemeteries, historic structures and sites, archaeologically significant sites, and sites having exceptional aesthetic quality; information regarding all known wells within 500 feet of the site; and any other information requested by the Executive Director.

The Applicant provided the required information in its Application; specifically, in Parts I/II, Section 3.1, and Figure I/II-5, Land Use Map. The Application indicates that surrounding land use within one mile of the proposed permit boundary is 58.4% open space, 21% institutional, 6.8% residential, 6.5% commercial, 4.7% agricultural, and 2.3% water bodies. The Application indicates there are 90 residences and 10 businesses within one mile of the proposed permit boundary. The nearest residence is about 150 feet from the proposed transfer station. No licensed daycare facilities or hospitals were identified within one mile. A country club and golf course are located about 1/2 mile to the east. No other parks and recreational areas were identified. Property containing facilities associated with Texas A&M University–Commerce is located across State Highway 24 to the west of the proposed transfer station. No other schools were identified within one mile. There are no known churches or cemeteries within one mile. Based on review from the Texas Historical Commission, no historical properties, archeological sites, or other cultural resources are present or would be affected by the proposed facility. Parts I/II, Section 3.1.1 of the Application indicates that the proposed location is outside of the incorporated limits of any city and is therefore not subject to any known city zoning ordinances.

The use of any land for a MSW facility must not adversely impact human health and the environment. (30 TAC § 330.61(h)). The TCEQ rules do not establish specific limits on these factors and only require that an applicant provide current and accurate information regarding these factors in the application. The Executive Director has determined that adequate information on land-use compatibility was provided in the Application.

TAMUC's Response to Comment 15: The existing land uses are incompatible with a transfer station in the proposed location. As discussed by TAMUC in its response to Comment 13 above, the impact to the surrounding area and the compatibility of land use should be taken into account. The ED satisfies itself that the requisite information has been submitted but fails to assess, analyze,

and evaluate the impact to the surrounding area and provide articulable conclusions in his response. Using this approach, it is unsurprising that all transfer stations proposed to TCEQ to be built are approved.

Comment 16: Texas Parks and Wildlife Department (TPWD) Recommendations

Karen Hardin, representing the Texas Parks and Wildlife Department (TPWD), provided suggestions for design and operation of the proposed facility if the permit is issued. These recommendations include: periods when no vegetation clearing would occur, pre-clearance surveys, minimization of exterior lighting, disturbance-free buffers along natural features, relocation of potentially affected native aquatic resources; preparation of and adherence to an aquatic invasive species transfer prevention plan; precautions to avoid impacts to Species of Greatest Conservation Need (SGCN) flora and fauna; minimization of disturbances to prairie vegetation; and avoidance of non-native species such as bermudagrass in seeding or revegetation plans. Similarly, Christy Andrzejewski, Michelle Babb, Cathy Beane, Christopher Jeremy Brecheisen, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Steven Ford, Noah Garcia, Alicia Guerra, Connie Hale, Mike Hale, Bunny Harmon, Randy Harp, Kelly Kuehl, Leslee Lay, Chelsea Morse, Jared Mumm, Mark Rudin, Amanda Scott, Robert Sutherland, Elizabeth Tarrant, Reabeccah Tarrant, and Ashley Whitmore felt that the proposed facility would adversely affect wildlife and livestock in its vicinity.

ED's Response 16:

An applicant for an MSW transfer station must consider the impact of the proposed facility on endangered or threatened species under 30 TAC § 330.61(n). The Application addresses these requirements in Parts I/II, Section 3.6 and in Parts I/II, Appendix II-B of the Application.

The TCEQ protects human health and the environment through the implementation and enforcement of 30 TAC Chapter 330 and other applicable regulations. The Executive Director has reviewed the application and preliminarily determined that it satisfies the statutory and regulatory requirements concerning protected wildlife, wildlife habitats, and livestock.

TAMUC's Response to Comment 16: TAMUC is the only party to this proceeding in the business of raising livestock with actual professionals employed for this purpose. In the opinion of TAMUC's trained livestock professionals, the proposed transfer station poses a threat to its livestock and TAMUC's offerings related to livestock raising and research.

Comment 18: Effects on Texas A&M University-Commerce and Related Activities

Adams, Alexander, Christopher Babb, Travis Ball, Dave Bickley, Tami Bishop, Cinda Boshart, Aden Boyer, Christopher Jeremy Brecheisen, Courtney Clanton, Daniel Clark, Ted Ray Crim, Amanda Delisle, Ethan Elmore, Lory Foster, Diana Fults, Noah Garcia, Stephen Gilcrest, David Alan Giles, Raymond Green, Connie Hale, Randy Harp, Richard Helge, James Hudson, Autumn Johnson, Alyssa Logston, Jonathan Maning, Barba McCord, Tina McCord, Liz Medina, Denise Morgan, Jared Mumm, Crystal Mumphrey, Kayla Price, Mark Rudin, Tim Schauer, Amanda Scott,

Alison Soeder, Michael Stark, Daniel Starks, Leanne Stevens, Bobby Stovall, Janis Stroope, Lynn Sutherland, Texas A&M University-Commerce Student Government Association, Kristi Taylor, Mickey Trusty, James Wickersham, and Jill Wichersham expressed their concern about the effect that the proposed facility would have on the Texas A&M University-Commerce facility located across Highway 24.

Similarly, Randy Harp and Jared Mumm indicated that the facility would have a detrimental effect on research at the facility and its funding.

ED's Response 18:

The TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. Accordingly, the TCEQ does not have jurisdiction to consider economic impacts, such as impacts to livelihoods, research, or research funding, on surrounding areas when determining whether to approve or deny a permit application. The Executive Director has reviewed the application and preliminarily determined that the facility, operated according to the permit provisions and 30 TAC Chapter 330, would adequately protect human health and the environment and prevent adverse health and environmental impacts.

TAMUC's Response to Comment 18: TAMUC respectfully contends that the ED is incorrect in his interpretation of TCEQ's rules. 30 TAC § 330.61(h) requires TCEQ to assess precisely what the ED claims it cannot: "information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest." The ED satisfies itself so long as the applicant submits this information but seems to decline to actually analyze that information. TAMUC requests that the ED actually address the issues raised by the rules as applied to the application and the circumstances at issue. TCEQ must also consider the large investment made by the State of Texas and its use of taxpayer funds to provide an educational environment at TAMUC for its agricultural curriculum. This proposed transfer station will not only negatively affect TAMUC's students, faculty, and staff but will negatively affect the research being performed by TAMUC.

Comment 19: Location

Christopher Babb, Christopher Jeremy Brecheisen, Daniel Clark, Ted Ray Crim, Jeffery Cross, Michael Hoffman, Jonathan Manning, Chelsea Morse, Janis Stroope, and Reabeccah Tarrant indicated that the proposed transfer station is not needed. Some of these individuals noted that the Maloy landfill in Campbell is approximately five miles away from the proposed location. Christy Andrzejewski, Travis Ball, Yumei Bao, Ted Ray Crim, Ethan Elmore, Diana Fults, Randy Harp, James Hudson, Susan Lousberg, Vickie Mize, and James Wichersham indicated that the proposed facility should be located somewhere else. Amanda Adams stated that the proposed facility would have no benefit to the community. Christopher Jeremy Brecheisen, Jonathan Manning, and Bobby Stovall indicated that the proposed location is bad or unusual. Travis Ball asked where transfer stations are typically found. Travis Ball indicated that the proposed location is not optimal and recommended the reconsideration of the North Central Texas Council of Governments (NCTCOG) approval of the proposed location.

ED's Response 19:

TCEQ's jurisdiction is established by the Texas Legislature and is limited to the issues set forth in statute and rules. TCEQ does not have the authority to specify locations for transfer stations or to suggest alternatives to the location that the Applicant has proposed for the facility. The Executive Director is only permitted to review the application, as the Applicant has submitted it, for compliance with all applicable rules.

In accordance with Texas Health and Safety Code Chapter 363 and 30 TAC Chapter 330, a council of government reviews MSW applications to determine conformance with the COG's Regional Solid Waste Plan (RSWP). North Central Texas COG indicated that the proposed facility conforms with their RSWP.

TAMUC's Response to Comment 19: The NCTCOG is in the process of promulgating a new Regional Waste Management Plan. While TCEQ is correct it cannot specify a location, it can examine a proposed location, identify problems and issues associated with that location and determine that the proposed location is not acceptable. Additionally, the NCTCOG voted to support the proposed transfer station at issue; however, TAMUC has subsequently discussed this transfer station with NCTCOG and at the time that the applicant presented to the NCTCOG, it was unaware that any community concerns would arise. In addition, NCTCOG confirmed that it does not have the opportunity to review any subsequent changes made to the Application and its finding is only that the transfer station conforms to the regional solid waste plan, which is a much narrower finding than TCEQ's review. TAMUC urges the ED to examine the new solid waste plan to determine whether the proposed transfer station is consistent with that plan beyond a general need for more transfer stations in north-central Texas. North Central Texas is large area and most certainly, certain locations are preferable to others. TAMUC requests that the ED provide the public reasons why the proposed transfer station is necessary in this location.

Comment 23: Waste Acceptance, Including Sources of Waste

Christopher Jeremy Brecheisen, Tammy Colclasure, Sean Dawson, Connie Hale, Karen Hammons, Randy Harp, John Kirkpatrick, and Katharine Knoodle asked about the types of waste that would be accepted at the proposed facility, including whether "Level 5" waste and hazardous waste would be accepted, and how there could be no limitations on the waste, as indicated in the Application.

ED's Response 23:

In accordance with 30 TAC § 330.61(b), an application for a transfer station must include the sources and characteristics of waste to be received for storage or processing. This information is specified in Parts I/II, Section 2.2; Part IV, Section 2; and Appendix IV-1 of the Application. According to the Application, the Highway 24 Transfer Station will accept MSW resulting from, or incidental to municipal, community, commercial, institutional, and recreational activities, including garbage, putrescible wastes, rubbish, ashes, brush, street cleanings, automobile parts, construction-demolition waste, and yard waste; Class 2 non-hazardous industrial solid waste;

Class 3 non-hazardous industrial solid waste; and special waste. The proposed facility will not accept wastes for which storage or processing are prohibited under 30 TAC § 330.15(e) or other wastes as specified in Parts I/II, Section 2.2.1 of the Application. These prohibited wastes include regulated hazardous waste, hazardous waste from very small quantity generators, polychlorinated biphenyl (PCB) waste, radioactive waste, regulated asbestos-containing materials, liquid waste, Class 1 industrial waste, used oil, used oil filters, whole used or scrap tires, and items containing chlorinated fluorocarbons (CFCs).

"Level 5" is not a designation for waste under MSW Rules; this appears to be a misunderstanding of the "Type V" designation in Chapter 330 for MSW storage and processing facilities. 30 TAC § 330.61(b)(1) requires an applicant to explain constituents or characteristics that could be a limiting parameter for an MSW facility. An early version of the application indicated that there were no limitations on the waste that would be accepted at the facility. During the review process the applicant clarified that if contaminant concentrations indicated the waste included Class 1 industrial waste, regulated hazardous waste, or characteristics indicating prohibited wastes (such as the presence of Polychlorinated biphenyls (PCB) waste or Regulated Asbestos Containing Materials (RACM), are limiting parameters and the waste would not be accepted at the transfer station.

TAMUC's Response to Comment 23: TAMUC requests that the ED require the applicant to state how it intends to identify any unacceptable waste and the processes and procedures that it will implement should any unacceptable classes of wastes be identified and disposed of at the proposed transfer station. This is required pursuant to 30 TAC § 330.103(5)(d)-(e).

Comment 25: Local Ordinance Issued December 28, 2021

Kevin Tibboel indicated that the Application is in violation of a local ordinance passed by the Commissions Court of Hunt County, Texas.

ED's Response 25:

The Hunt County Commissioners Court passed an ordinance,[10] effective December 28, 2021, that provides siting criteria for solid waste processing facilities. This Application was received on August 18, 2021, and administratively complete on September 14, 2021, which was prior to the ordinance effective date. In accordance with Texas Health and Safety Code § 364.012(e)(1), the county commissioners court may not prohibit the processing or disposal of MSW in an area of the county where an application for a permit has been filed with and is pending before the commission.

TAMUC's Response to Comment 25: While the filing of the transfer station application preceded the passage of the Hunt County ordinance, the message to the applicant and TCEQ as a result of the ordinance's passage is unmistakable: this transfer station is not welcome in Hunt County and is inconsistent with the surrounding land uses of the community. This action alone is sufficient grounds for TCEQ to disapprove the application because it evidences that the community opposes

[10] *See* Ordinance Prohibiting Solid Waste Disposal in Hunt County *available at* https://newtools.cira.state.tx.us/upload/page/8875/docs/PUBLIC%20NOTICE%20-%20Hunt%20County%20Landfill%20Regulations.pdf (Dec. 28, 2021).

the transfer station in this location and recognizes it as incompatible with the community. But for this specific transfer station application, Hunt County would not have passed the ordinance.

Comment 27: Noise

Travis Ball, David Alan Giles, Randy Harp, Jessie Moore, Jared Mumm, Crystal Mumphrey, Jillian Nichols, Mark Rudin, Amanda Scott, Texas A&M University-Commerce Student Government Association, and Kevin Tibboel believe that the proposed facility would generate noise detrimental to the surrounding neighbors.

ED's Response 27:

The TCEQ's jurisdiction is established by the Legislature and is limited to the issues set forth in statute. TCEQ rules do not set specific limits on the amount of noise generated by transfer station activities, vehicles, or equipment. However, a permit issued by the Commission "does not authorize any injury to persons or property or an invasion of other property rights, or any infringement of state or local law or regulations," in accordance with 30 TAC § 305.122(d). The Executive Director has reviewed the application and preliminarily determined that it satisfies the regulatory requirements regarding noise for the proposed facility.

By rule, waste acceptance hours are from 7:00 a.m. to 7:00 p.m., Monday through Friday, and operating hours are from 5:00 a.m. to 9:00 p.m., Monday through Friday; however, the rule notes that other hours may be approved. In Section 15 of Part IV of the Application, the Applicant has proposed waste acceptance hours from 5:00 a.m. to 6:00 p.m., Monday through Saturday, and operating hours from 4:00 a.m. to 7:00 p.m., Monday through Saturday.

TAMUC's Response to Comment 27: Allowing large trash trucks at the times proposed by the applicant is detrimental because the noise from the trucks and operation of the transfer station would impact TAMUC's livestock programs. The trucks from the sandpit, which is located on the same property as the proposed transfer station already cause backups and dangerous situations. TAMUC beseeches the ED reconsider its recommendation for the safety of TAMUC students, faculty, and staff and roads or at the least, require modifications to enhance safety in this location.

Comment 28: Contaminated Water Management

Dave Bickley, Christopher Jeremy Brecheisen, James Brown, Tammy Colclasure, Sean Dawson, Armando Delecruz, Ethan Elmore, Mike Hale, Randy Harp, Kelly Kuehl, Jessie Moore, Jared Mumm, Brad Rabe, Karen Starks, and Lynn Sutherland were concerned about liquids released from the waste and how it would be managed.

ED's Response 28:

The definition of contaminated water in 30 TAC § 330.3(36) includes any water that has contacted waste, therefore liquids from waste at the proposed facility would be contaminated water. Unpermitted discharge of contaminated water is prohibited under 30 TAC § 330.207(a). Part III, Sections 2.3.3 and 4.2 clarify that contaminated water, including floor wash water, will be directed

by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water dual-walled storage tank with an interstitial space for leak detection monitoring. The tank would hold somewhere between 500 and 2,000 gallons. A vacuum truck would remove the wastewater from the storage tank and transport it to an authorized facility.

TAMUC's Response to Comment 28: TAMUC is concerned that circumstances could cause water in excess of 2,000 gallons to overwhelm the proposed contaminated water containment system and urges TCEQ to ensure that the facility is built to support holding enough containment capacity if for example, a large fire occurred and multiple fire trucks were necessary to prevent contaminated water from escaping from the transfer station site. It is likely that in such an event, the water containment system would be inadequate and actual quantities must be determined. TAMUC requests that the amount of water utilized to combat a fire at the transfer station be identified and whether that amount of water is able to be contained be determined.

Comment 29: Surface Water

Michelle Babb, Yumei Bao, Michael Beane, Jay Boshart, Amy Braley, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Steven Ford, Noah Garcia, David Alan Giles, Kelly Kuehl, Denise Morgan, Jared Mumm, Crystal Mumphrey, Nicholas Scott, Karen Starks, Elizabeth Tarrant, Reabeccah Tarrant, Kevin Tibboel, and Vickie Wood stated concerns that the proposed facility would adversely affect surface water in the vicinity.

ED's Response 29:

The definition of contaminated water in 30 TAC § 330.3(36) includes any water that has contacted waste. Unpermitted discharge of contaminated water is prohibited under 30 TAC § 330.207(a). Part III, Sections 2.3.3 and 4.2 clarify that contaminated water, including floor wash water, will be directed by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water holding tank holding somewhere between 500 and 2,000 gallons. Design for this tank is shown on Detail 1 on Figure III-1.7 in Part III of the Application. A vacuum truck will remove the wastewater and transport it to an authorized facility. Properly managed contaminated water will not contaminate surface water.

TAMUC's Response to Comment 29: TAMUC directs TCEQ to see its response to Comment 28, above and reconsider its response accordingly.

Comment 30: Groundwater, Drinking Water, and Aquifer Protection

Christy Andrzejewski, Jimmy Babb, Travis Ball, Yumei Bao, Michele Benjamin, Jay Boshart, Amy Braley, Kathryn Brandt, Christopher Jeremy Brecheisen, Daniel Clark, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Ethan Elmore, Steven Ford, Stephen Gilcrest, Cathy Giles, David Alan Giles, Alicia Guerra, Tandy Hagar, Connie Hale, Mike Hale, Brett Harmon, Randy Harp, John Kirkpatrick, Kelly Kuehl, Mary Miller, Denise Morgan, Jared Mumm, Mark Rudin, Amanda Scott, Nicholas Scott, Alison Soeder, Karen Starks, Lynn Sutherland, Elizabeth Tarrant, Keith Tarrant, and Reabeccah Tarrant shared their concerns that the facility would adversely affect groundwater and drinking water. Similarly, Jimmy Babb wanted to know if regular water

tests and surprise inspections will be performed by the TCEQ and what guarantees citizens have to ensure that water supply is not contaminated. David Alan Giles indicated that the TCEQ only cares about the Edwards Aquifer. Additionally, Daryl Wayne Freelen expressed concern that the proposed facility would cause contamination to his water supply line.

Similarly, Christopher Jeremy Brecheisen asked if the TCEQ can help the community perform baseline tests of area water wells to check for toxin levels prior to project start (maybe at least those within a mile of the project). Christopher Jeremy Brecheisen noted that many local residents including families rely on well water for drinking and bathing.

ED's Response 30:

If the permit is issued, all waste will be unloaded onto a concrete floor. Liquids would drain to a sump and then to a dual-walled storage tank with an interstitial space for leak detection monitoring. Design for this tank is shown on Detail 1 on Figure III-1.7 in Part III of the Application. A more detailed discussion of contaminated water management is provided elsewhere in this RTC. The Executive Director has concluded that features to prevent contamination of groundwater have been addressed in the Application. Groundwater monitoring is not required for transfer stations under MSW rules.

Regular water tests for groundwater are not provided by the TCEQ. Regional offices perform inspections of regulated facilities and respond to all complaints from the public. While the Edwards Aquifer is specifically protected by the prohibition from landfills, all aquifers are protected by the other rules in Chapter 330, including requirements for liner systems at landfills and contaminated water management.

If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 30: TAMUC requests that due to the shallow aquifer in this area that the applicant be required to install and maintain monitoring wells and agree to periodic testing, the results of which would be shared with interested parties.

Comment 33: No Citizen's Collection Station (CCS)

Christopher Jeremy Brecheisen indicated that the facility has no CCS.

ED's Response 33:

MSW rules do not require CCSs at transfer stations. CCSs are typically found as stand-alone collection points for individuals for whom no trash collection is provided, or at landfills to allow citizens to unload waste away from the active face, but in no situation is it required.

TAMUC's Response to Comment 33: At the public meeting, the applicant indicated that members of the local community would be allowed to utilize the transfer station directly for trash disposal. TAMUC requests that the ED confirm whether members of the general public will or will not be allowed to use the transfer station through a CCS or otherwise and provide a detailed response. If the applicant confirms that a CCS will be allowed, the ED should require the applicant to provide a detailed process of allowing a CCS and dealing with escaped refuse as a result of the CCS pursuant to TCEQ rules.[11]

Comment 35: Odor, Dust, Vapors, Methane, and Effect on Air Quality

Janet Anderson, Christy Andrzejewski, Christopher Babb, Travis Ball, Yumei Bao, Dave Bickley, Kathryn Brandt, Christopher Jeremy Brecheisen, James Brown, Ashley Bryan, Tammy Colclasure, Ted Ray Crim, Jeffery Cross, Sean Dawson, Amanda Delisle, Daryl Wayne Freelen, Stephen Gilcrest, David Alan Giles, Raymond Green, Bunny Harmon, Randy Harp, Richard Helge, Kelly Kuehl, Jonathan Manning, Barba McCord, Dustin McNeese, Mary Miller, Jessie Moore, Denise Morgan, Jared Mumm, Crystal Mumphrey, Jillian Nichols, Kayla Price, Mark Rudin, Amanda Scott, Nicholas Scott, Alison Soeder, Wendy Speight, Daniel Starks, Janis Stroope, Lynn Sutherland, Texas A&M University-Commerce, Elizabeth Tarrant, Keith Tarrant, Reabeccah Tarrant, Kevin Tibboel, and Cyrus Vaughan raised concerns about air quality, including odor, dust, vapor, and methane.

ED's Response 35:

Air pollution control is required by 30 TAC § 330.245. The specific air pollution control proposed by the Applicant is in Section 23 of Part IV in the Application. The Application indicates that, if the permit is granted, a minimum 50-foot buffer zone would be maintained and no waste loading, unloading, or processing would occur outside the building. Liquid and solid waste would be stored in odor-retaining containers and vessels. The tipping floor would be washed routinely. Ponding of water would not be allowed, including wash waters. If waste is stored overnight, it would be within the enclosed building.

Section 23 of the Application indicates that dust that may occur within the building will be controlled, as needed, by water sprays, mist systems, or similar methods. Roads will be asphalt or concrete, as shown on Figure III-1.3 in Part III of the Application.

Section 23 of the Application also indicates that air emissions would be controlled in accordance with current air permitting requirements and that appropriate authorizations under Chapter 116 or Chapter 330, Subchapter U would be obtained prior to operation.

Individuals are encouraged to report nuisance odors to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 35: At the public meeting, Dr. Jared Mumm provided commentary and referenced a TAMUC study finding that odors can impact animals in numerous

[11] *See* 30 TAC § 330.213.

ways. TAMUC studies and performs research on animals and it is critical that detrimental impacts to those studies and animals do not occur. The ED's provision of a hotline to report issues is dismissive at best and at worst, disregards the years of animal program development TAMUC has cultivated over many decades. TAMUC's University Farm, which is directly across from the proposed site of the transfer station, has been in its location for more than 60 years. The applicant should not be allowed to establish a foreseeable nuisance adjacent to an established public use like a state funded institution of higher learning.[12] Odors are an inherent component of trash facilities and odors will be experienced by TAMUC and its animals.

Comment 36: Odor Control Chemicals

Kathryn Brandt was concerned about what odor-control chemicals would be used at the proposed facility.

ED's Response 36:

Section 23 of Part IV of the Application refers to a possible deodorizing system that could be utilized, if necessary. MSW rules require the applicant to describe any systems that will be utilized to control odors, but specific design information or material safety data sheets are not required as part of the application. Individuals are encouraged to report nuisance odors to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 36: TAMUC directs the ED to its response to Comment 35, above.

Comment 37: Vectors

Billy Rhea Beane, Dave Bickley, Kathryn Brandt, Noah Garcia, David Alan Giles, Kelly Kuehl, Jonathan Manning, Jared Mumm, and Lynn Sutherland stated that the transfer station would attract vectors, including rummaging animals.

ED's Response 37:

TCEQ's rules define a vector as an agent, such as an insect, snake, rodent, bird, or animal capable of mechanically or biologically transferring a pathogen from one organism to another. 30 TAC § 330.3(175). The breeding of vectors is a nuisance under 30 TAC § 330.3(97). The creation and maintenance of a nuisance is prohibited under 30 TAC § 330.15(a)(2).

As described in Part III, Section 2.3.2 of the Application, if the permit is issued, waste processing will occur within the transfer station on a concrete floor within a four-sided building with doors to enclose stored waste outside of processing hours. The concrete tipping floor will be washed down weekly, as required by 30 TAC § 30.243(a). Part III, Sections 2.3.3 and 4.2 of the Application

[12] *See Marvel Wells, Inc. v. Seelig* Ct., 115 S.W.2d 1011 (Tex. Civ. App 1938).

clarify that contaminated water, including floor wash water, will be directed by the tipping floor into a grit trap, which will drain by gravity into a sump and pumped to a contaminated water dual-walled storage tank with an interstitial space for leak detection monitoring. The Executive Director has reviewed the application and preliminary determined that is satisfies the regulatory requirement regarding vector control. Individuals are encouraged to report nuisance conditions to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 37: Vectors are an acute threat and concern of TAMUC due to their ability to contaminate TAMUC's livestock programs and research. We understand that the tipping floor is washed down once a week, however, vectors may operate on a different timeframe and locate in areas concealed but in proximity with the transfer station. For example, vectors may live near the transfer station knowing that the mere presence of the transfer station will present opportunities for them to obtain sustenance. Whether the transfer station itself is the source of vectors or it provides a more suitable area where vectors may locate and propagate nearby, the presence of a transfer station 100 feet from TAMUC's livestock programs presents an unacceptable threat to TAMUC's offerings. It is unlikely that once vectors are identified that the hotline number provided by the ED will be of utility. TAMUC requests that the ED reconsider its recommendation by thoroughly assessing the requirements of 30 TAC § 330.7(8) & (9) in the context of 30 TAC § 330.61(h).

Comment 38: Windblown Waste and Waste on Roads

Travis Ball, Dave Bickley, Kathryn Brandt, James Brown, Ted Ray Crim, Sean Dawson, Armando Delacruz, Daryl Wayne Freelen, Diana Fults, David Alan Giles, Randy Harp, Jonathan Manning, Crystal Mumphrey, Mark Rudin, and Jill Wickersham were concerned about windblown waste. Travis Ball, Jeffrey Cross, Sean Dawson, Randy Harp, Jessie Moore, Nicholas Scott, Janis Stroope, Texas A&M University-Commerce, Reabeccah Tarrant, and Jill Wickersham indicated that there would be trash along the roads if the facility is authorized. Similarly, Nicholas Scott asked for details on how provisions for cleanup of waste along roadways would be enforced and what fines would be assessed.

ED's Response 38:

The facility is responsible for picking up litter scattered throughout the site, along fences and access roads, at the gate, and along and within the right-of-way of public access roads serving the facility for two miles from the entrance (including any waste illegally dumped within the right-of-way). The litter must be collected at least once a day on the days that the facility is in operation as specified in 30 TAC § 330.233 and 30 TAC § 330.235. Additionally, in accordance with 30 TAC § 330.235, the Applicant must take steps to encourage vehicles hauling waste to the facility to be enclosed or provided with a tarpaulin, net, or other means to effectively secure the load to prevent the escape of any part of the load by blowing or spilling. Sections 17 and 18 of Part IV of the Application address these requirements.

The Executive Director has reviewed the application and preliminarily determined that it satisfies the regulator requirements regarding windblown waste and litter. Individuals are encouraged to report nuisance conditions to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 38: The ED's response evinces a clear need for a supplemental agreement binding the applicant to ensure that trash lost from trucks approaching, entering, or exiting the transfer station is the responsibility of the applicant. Because the rules do not account for litter that falls outside of the parameters established by TCEQ rules, a comprehensive approach to litter management and meaningful penalties for failing to manage litter is critical to protect TAMUC's programs and adjacent properties. The rules clearly contemplate that "other suitable practices be employed to control windblown material."[13] More importantly, assuming that trash is identified with certainty to be within the distances and locations established by the rule, the rules do not establish a time frame within which the litter must be removed except that it must be "collected" at least once a day on days the facility is in operation. Livestock do not operate on time frames for refuse removal. From a practical standpoint then, TAMUC will be forced to remove immediately any litter that may come into reach of its livestock. Livestock rearing depends upon stewardship and requires immediacy of action that TCEQ rules fail to achieve or require of the applicant. The reality of the ED's adherence to TCEQ's rules in this instance results only in stray waste being the problem not of the applicant but of TAMUC and any others nearby who must protect their livestock not only "at least once a day" but at all times. Finally, TCEQ must require the applicant not just to "encourage vehicles hauling waste to the facility to be enclosed" but to ensure that no waste escapes that could be consumed by nearby livestock. Such specific requirements are authorized pursuant to 30 TAC § 330.7(8)&(9) and 330.103(5)(d)-(e).

Comment 39: Operating Hours

Kathryn Brandt and Jared Mumm indicated that proposed operating hours are excessive.

ED's Response 39:

In accordance with 30 TAC § 330.229(a), an application must include waste acceptance hours and operating hours for when the facility will transport materials on or off-site, as well as the hours for when a facility will operate heavy equipment. By rule, waste acceptance hours are from 7:00 a.m. to 7:00 p.m., Monday through Friday, and operating hours are from 5:00 a.m. to 9:00 p.m., Monday through Friday; however, the rule notes that other hours may be approved.

In Section 15 of Part IV of the Application, the Applicant has proposed waste acceptance hours from 5:00 a.m. to 6:00 p.m., Monday through Saturday, and operating hours from 4:00 a.m. to 7:00 p.m., Monday through Saturday. The Executive Director has received no information to justify restricting these proposed operating hours. If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800.

[13] *See* 30 TAC § 330.233(a)(1).

Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 39: If by rule "other hours may be approved," TAMUC requests that other hours be approved because the hours proposed by the applicant conflict with critical traffic going to and from TAMUC's facilities at hours that coincide with heavy truck traffic going to and from the sandpit and the proposed waste transfer station. TAMUC requests that TCEQ disapprove the application. If TCEQ approves the application, TAMUC requests that TCEQ require the trash trucks to utilize the transfer station during hours that do not conflict with TAMUC traffic. Further, TAMUC takes exception with the ED's claim that it has not received information to justify restricting these hours because TAMUC and others at the public meeting and in public comments have explained how the hours proposed by the applicant coincide with heavy uses of the highway by TAMUC and the general public. In addition, the noise from trucks going to and from the proposed transfer station site will disrupt animal sleeping patterns and their quality of life, which impacts TAMUC's related work. TCEQ rules allow for the ED to specify alternative operating hours and TAMUC requests that the ED do so in this matter.[14]

Comment 40: Fire, Firefighting Activities, and Volunteer Fire Department

Travis Ball, Dave Bickley, Kathryn Brandt, David Alan Giles, Randy Harp, Bobby Stovall, and Lynn Sutherland shared a concern for fires, particularly in consideration of a volunteer fire department that serves the community where the facility is proposed. Dave Bickley asked about runoff and emissions relating to fire fighting. Kathryn Brandt asked who would supply water at the facility and whether there would be an adequate supply.

ED's Response 40:

A Fire Protection Plan, as required under 30 TAC § 330.221(c), is provided in Section 11 of Part IV of the Application. The facility will have a water tank and a 100 gallon per minute pump to ensure that water will reach all parts of the tipping floor. The final sizing of the water tank will be determined after contacting the local fire marshal and in accordance with local fire codes at the time of construction. The facility must also meet any additional local fire codes. MSW rules do not require an application to provide the source of water for a proposed facility.

TAMUC's Response to Comment 40: TAMUC requests that the local fire marshal and local fire departments be contacted as a condition of any approval of the transfer station. It is important that the fire plan is one that has been recently updated to account for the changes inherent in the presence of the transfer station. In this instance, the fire plan accounts only for the safety of the transfer station itself and not the safety of the surrounding area, including TAMUC campus. TAMUC requests that as a condition of any approval that a comprehensive and area-specific fire plan be developed, implemented and regularly updated to ensure the safety of TAMUC and the other neighboring properties.

Comment 41: Dumping Outside Transfer Building

[14] 30 TAC § 330.229.

Christopher Jeremy Brecheisen is concerned that waste dumping will occur outside the transfer building.

ED's Response 41:

Section 23 of Part IV of the Application states that no waste loading, unloading, or processing may occur outside the building. Additionally, the Draft Permit does not authorize outdoor waste storage or processing, other than a wastewater storage tank. The Draft Permit does not authorize any disposal of waste.

TAMUC's Response to Comment 41: The ED's response is unresponsive to Mr. Brecheisen's concern. TAMUC requests that the ED clarify what measures will be implemented to prevent waste dumping from occurring and what penalties and remedies are in place to prevent dumping, especially if the community is allowed to utilize the transfer station.

Comment 42: Visual Damage to Community

Jillian Nichols and James Wickersham indicated that the proposed facility would visually ruin the community.

ED's Response 42:

Section 20 of Part IV of the Application indicates that waste processing operations will be conducted within the transfer station building to minimize adverse visual impacts.

TAMUC's Response to Comment 42: The ED's response is unresponsive to the comment and concern expressed by Ms. Nichols and Mr. Wickersham. Further, whether waste processing operations occur within the building does not address the visual impacts of the building itself or the operations that take place outside of the building. TAMUC requests that the ED address representations of the applicant that trees, fences, etc., would be installed to eliminate the visibility of the transfer station as well as other means of ensuring that if the proposed transfer station is approved, that it will not negatively impact the views and visual environment. The ED should reconsider its recommendation and require the applicant to provide screening and other measures acceptable to TAMUC and other affected persons if the application is approved pursuant to TCEQ rules.[15]

Comment 43: 72-hour Waste Storage

Travis Ball indicated that allowing 72-hour storage of waste is excessive.

ED's Response 43:

[15] *See* 30 TAC § 330.239.

The MSW rules do not limit waste storage time at this type of transfer stations but provide that these types of activities must not lead to nuisances, such as odor, vectors, or windblown waste. Parts I/II, Section 2.2.4 of the Application indicate that solid waste will generally be processed within 4 to 6 hours on average, but that maximum holding times on holidays or in the event of equipment breakdown will not exceed 72 hours. If the permit is issued authorizing the proposed MSW facility, then individuals would be encouraged to report any concerns regarding suspected noncompliance with the terms of the permit or other TCEQ authorization or applicable environmental regulation to the Region 4 TCEQ Office in Fort Worth, Texas at 817-588-5800. Individuals may also file complaints by phone at 1-888-777-3186 or filed online at https://www.tceq.texas.gov/compliance/complaints.

TAMUC's Response to Comment 43: TAMUC hosts large scale and heavily attended events that begin on Fridays during the summer and end the following week. During summer months, the Texas heat is certain to cause increased odors by decomposing the contents held within the transfer station. Because winds blow in the direction of TAMUC from the transfer station, it is certain that odors will impact TAMUC's events. While TAMUC appreciates the ED's provision of a hotline number in such events, it is unlikely that calling the hotline number on a hot Texas-summer Saturday will result in abatement of any nuisance caused by the transfer station until the following week—which could severely tarnish TAMUC events. TAMUC requests that as a condition of approval that TCEQ require fast-response assurances to address any immediate nuisances caused by the transfer station and requests that the ED specifically address this concern in its response.

Comment 45: Communities Served

Teresa Crow asked what counties the proposed facility would serve. Travis Ball, Ted Ray Crim, Jeffery Cross, Sean Dawson, and James Hudson noted that waste would be accepted from outside of Hunt County. Travis Ball indicated that the facility was too large for the community in which it would be located and so would be receiving waste from outside Hunt County.

ED's Response 45:

Parts I/II, Section 2.2.1 of the Application indicates that the facility will primarily serve Hunt County and surrounding communities. Subparagraph 30 TAC § 330.61(b)(1)(A) requires a brief description of the general sources and generation areas contributing waste to a proposed facility. The rules regulating transfer stations do not limit transfer stations to accept waste from only the county where the facility is located.

TAMUC's Response to Comment 45: The ED's response does not address the substance of the public comments and deflects to the contents of the application and the rules instead of verifying that the size of the proposed facility corresponds with the actual needs of the area. TAMUC requests that the ED specifically explain why this size of facility is needed and how the anticipated growth of the area over several decades justifies a facility of this size. TAMUC requests that the ED specifically address this concern in the context of the definition of "population equivalent," as defined in TCEQ rules.[16]

[16] *See* 30 TAC § 330.3(115).

Conclusion: An entire local and campus community is located in close proximity to the proposed transfer station. This community will be directly affected by the transfer station operations. TCEQ needs to go beyond the applicant's description of this community; TCEQ must evaluate the application's impact on this community as required by the rules. TAMUC respectfully requests that the Commission require this application to be processed not only based on the bare minimum information but also with consideration of the impact of this facility on the entire area under the totality of the circumstances, which the rules contemplate. TAMUC believes that the best way to achieve this is for the Commission to refer this matter to the State Office of Administrative Hearings and requests that such a referral be made and that a hearing on the merits be held.

Please direct all communications and documents for TAMUC to Mr. Travis Ball, Texas A&M University-Commerce, at (903) 886-5060 or Travis.Ball@tamuc.edu .

Sincerely,

Mark Rudin
President

Attachments

c: Office of General Counsel, The Texas A&M University System

ATTACHMENT A

November 11, 2021

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78735

Ms. Laurie Gharis
Chief Clerk
Office of Chief Clerk, MC 105
TCEQ
P.O. Box 13087
Austin, TX 78711-3087

Re: Application of Transfer Station Solutions, LLC for Municipal Solid Waste Facility Permit

Dear Deputy Director Fritz and Chief Clerk Gharis:

Texas A&M University–Commerce (University), joins the many other concerned members of the Commerce community in opposition to the application of Transfer Station Solutions, LLC (Applicant) for a municipal solid waste facility under Permit No. 2411. The proposed transfer station will be situated directly across State Highway 24 from certain University teaching and research classrooms and facilities and is unsuitable for an educational environment (See depictions attached). In addition, the University requests more information on the Applicant's plan for the transportation of the transferred waste from the proposed transfer station. The University is concerned that such transferred waste will be taken by tractor trailers from the proposed station north along State Highway 24 running directly adjacent to the main campus of the University in Commerce to the final waste disposal site, exacerbating the negative effects on the University. The University is in the process of assessing the overall impact that this facility would have to its campus community and will submit a more formal response detailing our apprehensions, and we wanted to register our complete concern over this proposed facility.

We are certain that allowing this project to proceed will result in at least the following issues:

1. Odors and noise that will impact the University's students, veterinary instruction facility, agricultural facility, animal facilities, and research projects;
2. Increased traffic directly across from the entrance to University facilities that will endanger those accessing these University facilities;
3. Visual impacts from the University, including from the upper levels of its campus buildings;

4. Negative impacts to the University's ability to recruit faculty and students and to promote its educational opportunities due to odors, visual impacts, noise and presence of stray trash;
5. Negative impacts on the University's to-be-constructed Agricultural Expo Facility to be located on the University's property approximately 2.4 miles north of this proposed site on State Highway 24 (See depiction attached); and
6. Potential impacts to the local water table and harm to the many local water wells.

The University has worked hard and invested significantly to create a special learning and research environment that is attractive to students, faculty and alumni alike. This environment, which is critical to a successful campus and contributes to the entire Commerce community, is directly threatened by the odors, noise, traffic and environmental impact of a solid waste facility in such close proximity. The University requests that it be considered a stakeholder in all considerations of this application given the University's property is within 300 feet of the entrance to the proposed facility. We request that a public meeting be scheduled so that students, staff and faculty may have an opportunity to provide you with their thoughts on the impact a municipal solid waste facility will have on the campus.

Thank you for your consideration of this important matter. Our contact for this matter will be Mr. Travis Ball, Texas A&M University-Commerce, at (903) 886-5060 or Travis.Ball@tamuc.edu.

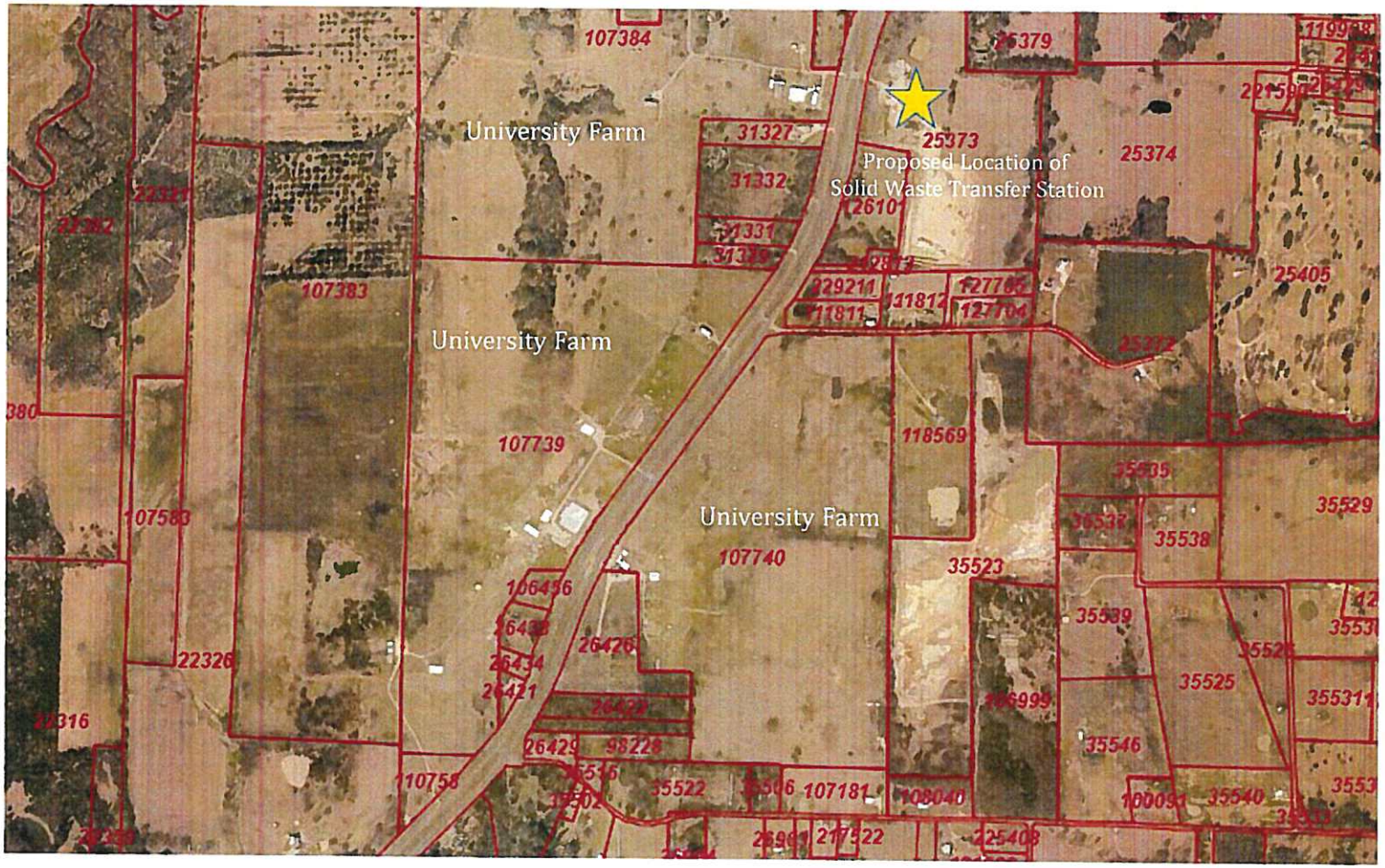
Sincerely,

Mark Rudin
President

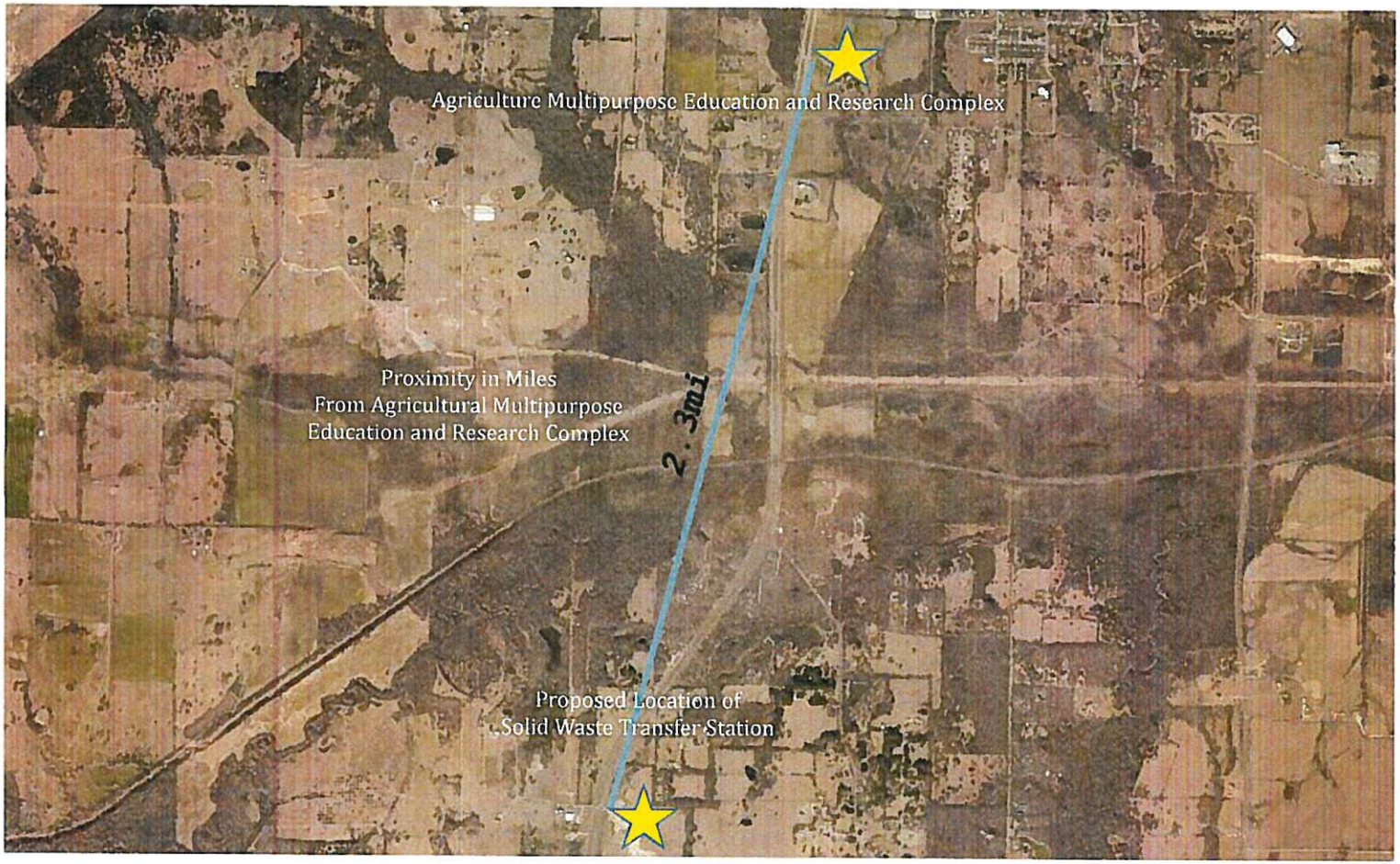
Attachments

c: Office of General Counsel, The Texas A&M University System


25379
Proximity in Feet
From TAMUC Property
TAMUC Vet Tech
& Greenhouse
247.9
Proposed Location of
Solid Waste Transfer Station
31327
25373
31332
126101
31331


University Farm
University Farm
University Farm
Proposed Location of
Solid Waste Transfer Station
107384
25379
25373
25374
31327
31332
31331
31329
126101
107383
107739
107740
118569
25405
35529
35538
35523
35539
35525
35546
35540
35522
107181
108040
107583
22326
22316
110758
26426
26429
98228
26421
106456
25372
35535
35537
35526
35531
35533
35506
35502
217522
225408
100091
22321
22382
380

00528


Agriculture Multipurpose Education and Research Complex
Proximity in Miles
From Agricultural Multipurpose
Education and Research Complex
2.3mi
Proposed Location of
Solid Waste Transfer Station

ATTACHMENT B

April 28, 2022

Mr. Charley Fritz
Deputy Director
TCEQ – Waste Permits Division
12100 Park 35 Circle
Austin, TX 78738

Re: Application of Transfer Station Solutions, LLC for a Municipal Solid Waste Facility Permit – Additional Concerns and Request for a Contested Case Hearing on the Merits

Dear Deputy Director Fritz:

Texas A&M University–Commerce ("University") again writes to express its deep and continued opposition to the application submitted by Transfer Station Solutions, LLC (the "Applicant") for the construction of a municipal solid waste facility ("waste facility") under Permit No. 2411, to inform the Texas Commission on Environmental Quality (the "Commission") of additional issues and problems associated with the construction of this waste facility, and to request a contested case hearing on the merits to assess these issues and problems fully. The University is an affected party because its campus is located within 300 feet across the highway from the proposed location of the waste facility. Therefore, the University has legal rights and economic interests that would be impacted if the Commission approves this proposed waste facility.

The local community's opposition to the waste facility has been virtually unanimous. The community does not want this waste facility in this location. In December 2021, Hunt County even passed an ordinance prohibiting any future waste facilities without the express approval from Hunt County due to this waste facility application.[1] If this waste facility application were submitted to the Commission today, it could not be built unless Hunt County approved its construction irrespective of any approval from the Commission. Hunt County listened to its residents and acted. The University and the local community ask the Commission to do the same by at minimum, approving the application in an alternative location away from the University and the nearby residents.

Since the University filed its November 11, 2021, letter to the Commission, it has further explored the impacts of the proposed waste facility on its operations and the surrounding area. These impacts must be fully assessed, understood, and addressed prior to any final action on this waste facility. While the University does not believe reasonable accommodations for this waste facility are possible, at a minimum, the following issues must be assessed:

[1] *See* Ordinance Prohibiting Solid Waste Disposal in Hunt County, effective December 28, 2021 *available at* https://www.huntcounty.net/upload/page/8875/docs/PUBLIC%20NOTICE%20-%20Hunt%20County%20Landfill%20Regulations.pdf.

Office of the President
P. O. Box 3011 • Commerce, TX 75429-3011 • Phone: 903.886.5014 • Fax: 903.886.5010 • www.tamuc.edu

A Member of The Texas A&M University System

1. **Inadequate Opportunity for Participation.** The Applicant has already failed to be a "good neighbor" to the local community affected by the filing of its application. First, the Applicant opted not to conduct an optional pre-application meeting to inform and meet with the local community.[2] Second, the University offered for the April 28, 2022, public meeting to be held on campus so that students, faculty, and local residents could attend. Instead, the Applicant opted to have the public meeting at The Landmark on Lee Street in Greenville, which is over 20 miles away from the proposed location of the waste facility. This limits the ability of those most affected by this waste facility to express their concerns and hear from the Applicant. Many students and faculty have expressed concern to the University about this public meeting being in Greenville rather than Commerce and the difficulties this location presents to those who want to attend. The Commission must consider requiring another public meeting in a more convenient location—a location that is not 20 miles from the location of the proposed waste facility—so that all those impacted can have an opportunity to participate in this process, including the students of the University.

2. **Unacceptable Traffic Safety Risks**. The University has evaluated the challenges and safety issues associated with the increased truck traffic to and from the waste facility. In addition to the heavy traffic in the area, the University's analysis identified an average of over 70 vehicles per day traveling in front of the University's facilities near the waste facility at over 85 mph, with several in excess of 90 mph. With trucks already traveling in this area and the University's students, staff, and faculty forced to navigate the presence of additional large trucks associated with the waste facility, everyone who must travel to the University is endangered. If students and faculty of the University are required to share an intersection with the waste facility as proposed and the high volume of large trucks it will bring daily while simultaneously navigating the numerous accelerating and decelerating vehicles in the area, the potential for accidents rises to a high-risk level for the University community. The University recently needed to work with Texas Department of Transportation ("TXDOT") at another intersection in this area of State Highway 24 to provide new traffic control measures to address certain issues resulting from vehicles entering and exiting the University's facilities along State Highway 24. The addition of this transfer facility truck traffic will create another high traffic intersection used by University students, faculty and staff.

3. **Impact to University Research and Academic Offerings.** The University was created and is funded by Texas taxpayers to facilitate agricultural education and activities in the State of Texas. This waste facility will negatively impact the University's agricultural offerings. The University's College of Agricultural Sciences and Natural Resources has examined the likely impact of the waste facility to its current testing, operations, educational, research, and other agricultural offerings and is gravely concerned that this waste facility will limit its ability to continue its offerings without accommodations to staunch the impact of the waste facility. The University already has existing requirements and protections for trash container delivery and transit in place to avoid the impact trash collection noise and commotion has on University animal research activities. Similar noise and associated impacts from this neighboring transfer

[2] *See* 30 TAC §§ 39.501(b) and 330.53.

facility will need to be frequently assessed to determine what additional measures are necessary to counteract the negative effects of this waste facility to ongoing and future University research. Sudden noises add stress to an animal's environment and animal stress directly impacts animal health. The University cattle herd is particularly sensitive to stress triggers. It will be critical for the University to constantly assess how it will continue to maintain the levels of excellence it must offer given the presence of the waste facility. This examination will require extensive attention and resources by the University annually. The proposed location of the waste facility is in direct proximity to the University's agricultural research facilities where extensive animal research is performed annually. The University provides additional information (attached hereto as **Exhibit A**) to give the Commission a preliminary idea as to the impact of waste facilities on animal environments. Further, the University will need to conduct an exhaustive review of current and future grant applications and other funding requirements to identify whether the existence of the waste facility will complicate its ability to or disqualify it completely from continuing to receive or qualify for research funding due to the proximity of the waste facility stressors to its current and future animal operations.

4. **Property Valuation.** There are extensive studies (attached hereto as **Exhibit B**) assessing the impact of waste facilities like the proposed transfer station on nearby property values. It is critical that the Commission require further studies and analysis so that if it approves this waste facility, additional protections and accommodations to preserve community property values and the University's own property values are implemented. While there are various studies concerning the impact of waste facilities on residential property values, a thorough analysis of the impact of waste facilities on the University's property has not been performed. It will be critical to determine the impact of the waste facility on the University's property used for educational and research purposes —property it must preserve in trust on behalf of the people of Texas—now and over time.

5. **SOAH Issues.** Accordingly, the University respectfully requests that the Commission refer to the State Office of Administrative Hearings the issues listed on **Exhibit C** attached hereto.

Finally, student and faculty recruitment is an ongoing and challenging focus of the University. The University is concerned about its ability to grow, expand and attract students and faculty, and receive grants for research opportunities with a waste facility directly across from its campus. We look forward to a thorough review of these issues.

Sincerely,

Mark Rudin
President

EXHIBIT A
ANIMAL IMPACT STUDIES

1. Fernandez-Novo, Aitor., Perez-Garnelo, Sonia S., Villagra, Arantxa., Perez-Villalobos, Natividad., Astiz, Susana. 2020. The Effect of Stress on Reproduction and Reproductive Technologies in Beef Cattle—A Review. Animals.

2. Broucek. 2014. Effect of noise on performance, stress and behavior of animals. Slovak J. Anim. Sci.

3. Phil M. Urso, Abe Turgeon, Flavio R. B. Ribeiro, Zachary K. Smith & Bradley J. Johnson (2021) Review: the effects of dust on feedlot health and production of beef cattle, Journal of Applied Animal Research, 49:1, 133-138, DOI: 10.1080/09712119.2021.1903476

EXHIBIT B
STUDIES ON IMPACT OF WASTE FACILITES ON SURROUNDINGS

1. BBC Research & Consulting, *Potential Impacts of Proposed Waste Transfer Station near Carbondale*, November 26, 2012.

EXHIBIT C
LIST OF ISSUES FOR REFERAL TO THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

1. The Applicant has not sufficiently demonstrated that the proposed transfer station meets the ventilation and air pollution control requirements required under 30 TAC §§ 330.209, or 330.245; nor that the operation of the proposed transfer station will not result in noise, odors, or other nuisances under §§ 330.15 and 330.233, impacting the University community, surrounding community, wildlife, or agricultural uses in the vicinity.

2. The Applicant has not sufficiently demonstrated that the management and operation of the proposed transfer station meets the requirements under 30 TAC §§ 330.203, 330.205, 330.215, and 330.249.

3. The Applicant has not demonstrated that it has sufficient competency to operate the proposed transfer station given the unique nature of the surrounding area as required under 30 TAC § 330.59.

4. The Applicant has not demonstrated that the proposed transfer station is a compatible land use in light of the concerns raised by the university and the local community as required under 30 TAC § 330.61.

5. The Applicant has not demonstrated that the proposed accommodations for the use of the roads and the intersection in the vicinity of the transfer station adequately accommodate the needs of the transfer station and those of the current and future surrounding community as required under 30 TAC § 330.61.

6. The Applicant has not demonstrated that the proposed transfer station will not cause the endangerment of human health, welfare, or the environment as is prohibited under 30 TAC §§ 330.15(a)(3) or 330.221.

7. The Applicant has not demonstrated that it will implement adequate waste screening measures for identification and removal of hazardous or flammable wastes that could endanger the University, its buildings, its agricultural programs, and the surrounding community and neighborhoods as required under 30 TAC §§ 330.203 and 330.241.

8. The Applicant has not demonstrated adequate wetlands delineation nor has it adequately addressed potential impacts to nearby wetlands or ponds as required under 30 TAC §§ 330.61, 330.63, and 330.547.

9. The Applicant has not sufficiently demonstrated that the proposed transfer station will adequately protect the aquifer, which is shallow and permeable, or the local groundwater for the surrounding community as required under 30 TAC §§ 330.63, 33.207, 330.303, and 330.401-403.

10. The Applicant has not demonstrated that the proposed operating hours for the proposed transfer station will not impact the various operations of the University, including agricultural operations, as required under 30 TAC § 330.229.

11. The Applicant cannot meet the requirements of 30 TAC § 330.231 without negatively impacting the campus environment and violating 30 TAC § 330.239. Further, the Applicant has failed to provide signage in Spanish as required by the Commission.

12. The Applicant has not demonstrated that the proposed transfer station will not negatively impact local residential, commercial, agricultural, or educational institution property values.

13. The Applicant has not demonstrated that the proposed transfer station will actually decrease alleged "illegal dumping" in the area.

14. The Applicant has not demonstrated that if citizens are allowed to access the transfer station to dispose of waste, that the roads to and in the vicinity of the waste facility can safely accommodate the additional traffic.

15. The University requests that the Commission reconsider the Executive Director's "technically complete" determination.

View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialogue box that appears. Note: If your browser does not support this function, select Print from the File menu to print the label.

2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. **GETTING YOUR SHIPMENT TO UPS**
   Customers with a scheduled Pickup
   - Your driver will pickup your shipment(s) as usual.

   Customers without a scheduled Pickup
   - Schedule a Pickup on ups.com to have a UPS driver pickup all of your packages.
   - Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. To find the location nearest you, please visit the 'Locations' Quick link at ups.com.

UPS Access Point™
ADVANCE AUTO PARTS STORE 5087
204 HARVEY RD
COLLEGE STATION TX 77840-3341

UPS Access Point™
CVS STORE # 6740
2411 TEXAS AVE S
COLLEGE STATION TX 77840-4633

UPS Access Point™
MICHAELS STORE # 7782
1505 UNIVERSITY DR E
COLLEGE STATION TX 77840-2673

FOLD HERE

