



Texas Commission on Environmental Quality
Correspondence Cover Sheet
Waste Permits Division

Date: 05/26/2026

Facility Name: City of Denton ECO-W.E.R.C.S. Complex

Permit, Registration, or

Authorization No.: 1590B

Nature of Submittal:

☐ Initial

☒ Deficiency Response to TCEQ Tracking No.: 32766689
 (from subject line of TCEQ Notice of Deficiency)

Affix a completed Correspondence Cover Sheet to the front of each submission to the Waste Permits Division. Check **one box** to indicate type of correspondence. Call (512) 239-2335 if you have questions.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Communications
Permit (New): ☐ Landfill ☐ Processor ☐ Compost	☐ Alternative Daily Cover Status Report
☐ Registration Application (New)	☐ Closure Report
☐ Major Amendment	☐ Compost Report
☐ Limited Scope Major Amendment	☐ Groundwater Alternate Source Demonstration
☒ Modification with Public Notice	☐ Groundwater Corrective Action Report
☐ Modification without Public Notice	☐ Groundwater Monitoring Report
☐ Ownership Transfer/Name Change Modification	☐ Groundwater Background Evaluation Report
☐ Temporary Authorization	☐ Landfill Gas Corrective Action Report
☐ Voluntary Revocation	☐ Landfill Gas Monitoring Report
Subchapter T: ☐ Permit ☐ Registration	☐ Liner Evaluation Report
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Soil Boring Plan
Notice of Intent: ☐ New ☐ Revision ☐ Closure	☐ Special Waste Request
☐ Other Application:	☐ Other Report or Communication:

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Notifications	
☐ CCR Registration (New)	☐ Extension Request	☐ Interim Status Change
☐ Permit Application (New)	☐ CfPT Plan/Result	☐ Interim Status Closure Plan
☐ Permit Renewal	☐ CPT Plan/Result	☐ Closure Certification/Report
☐ Post-Closure Order (New)	☐ Construction Certification/Report	CCR Notifications:
☐ Major Amendment	☐ Corrective Action Effectiveness Report	☐ CCR Closure Care Plan
☐ Minor Amendment	☐ Groundwater Alternative Source Demonstration Report	☐ CCR Design Criteria
Class of Permit Modification: ☐ 1 ☐ 1ED ☐ 2 ☐ 3	☐ Groundwater Background Evaluation Report	☐ CCR Groundwater Monitoring and Corrective Action Report
☐ Endorsement	☐ Groundwater Monitoring Report	☐ CCR Location Restriction
☐ Temporary Authorization	☐ Soil Core Monitoring Report	☐ CCR Operating Criteria
☐ Voluntary Revocation	☐ Treatability Study	☐ CCR Post-closure Care Plan
☐ 335.6 Notification	☐ Trial Burn Plan/Result	☐ Other Report or Notification (specify):
☐ Other:	☐ Unsaturated Zone Monitoring Report	



May 26, 2026
Mr. Xiaodong Zhang, P.E., Project Manager
Municipal Solid Waste Permit Section, MC 124
Texas Commission on Environmental Quality (TCEQ)
Building A, Room 122
12100 Park 35 Circle
Austin, Texas 78753-1808

Re: City of Denton ECO-W.E.R.C.S Complex, Denton County
MSW Permit No. 1590B
Municipal Solid Waste (MSW) Permit Modification – With Notice
Tracking No. 32766689; RN102212685 / CN600358980

Dear Mr. Zhang,

We have received the Notice of Deficiency (NOD 1) email dated April 27, 2026 for the above referenced application. As requested in the NOD email, each comment is listed below with Parkhill's response (referencing applicable revisions by part, section, and page number) immediately following the comment.

Comment 1: *Provide the updated estimated maximum annual waste acceptance rate during facility life.*

Response: A maximum annual waste acceptance rate is added in Part IV.
To further address this comment, Part III, Section 8.4 (Site Life Calculations) has been updated to reflect the revised waste acceptance assumptions and revisions to site life. The analysis demonstrates that the projected waste acceptance rates over the facility life are consistent with the proposed maximum acceptance rate and the proposed modification.

Comment 2: *Clarify if the updated estimated maximum annual waste acceptance rate is for the landfill only, or for the whole complex. If the latter, provide the estimated maximum annual waste acceptance rate for the landfill.*

Response: The estimated waste acceptance rate of 2,500 tons per day as presented in the application represents tonnage accepted at the landfill. Part II, Table 1 and Table 2 present "MSW Tonnage Accepted at Complex Gates" and "MSW Tonnage Disposed in Landfill" separately.

To further address this comment, Part IV – Site Operating Plan has been revised to clarify the estimated maximum annual waste acceptance rate at the landfill is 912,500 tons which is equivalent to 2,500 tons per day.

Comment 3: *Include all mineral interest ownership under the facility or provide a statement that there is no mineral interest ownership under the facility.*

Response: A statement has been added to Figure 4.1 Land Ownership Map noting that "The Denton County Appraisal District does not maintain mineral interest ownership records. There is no known mineral interest ownership under the facility".

Comment 4: *Provide the adjacent landowners list in label format in electronic form. The label format should have 30 labels to a page (AVERY 5160). Each letter in the name and address must be capitalized, contain no punctuation, and the appropriate two-character abbreviation must be used for the state. Each entity listed must be blocked and spaced consecutively.*

Response: The adjacent landowners list has been prepared and is included as a separate electronic attachment in the required AVERY 5160 label format, and meeting all formatting requirements specified by TCEQ.

Comment 5: *Clarify the location of the parcel corresponding to Map ID no. 169 in Figure 4.1 Land Ownership Map.*

Response: The location of Parcel Map ID No. 169 has been labeled in Part II, Section 15 (Land Ownership and Easements) and reflected in the revised figure.

Comment 6: *Part II, Table 1. Clarify if “MSW Tonnage Accepted at” and “MSW Tonnage Disposed in” are “MSW Tonnage Accepted at Complex Gates” and “MSW Tonnage Disposed in Landfill”, respectively, and if so, revise them accordingly.*

Response: The column headings in Part II, Table 1 were unintentionally omitted due to a formatting error. Table 1 has been revised to clearly identify these values as ‘MSW Tonnage Accepted at Complex Gates’ and ‘MSW Tonnage Disposed in Landfill.’

Comment 7: *Due to the proposed increase in the waste acceptance rate, describe changes of traffic information and demonstrate availability and adequacy of roads associated with the proposed increase of the waste acceptance rate.*

Response: It is important to note that the traffic demonstration assumes a highly conservative scenario in which 100% of the facility-related traffic is modeled on each evaluated roadway segment independently, without accounting for traffic distribution or split between multiple access routes. In practice, facility traffic would be distributed among several roadway corridors.

In accordance with 30 TAC § 330.125(h), justification for the proposed increase in waste acceptance rate is provided through a detailed comparison of traffic volumes and roadway capacity associated with the revised projected closure year 2072 relative to the currently projected closure year of 2089, estimated in the current permit (see revised site life calculations for increased maximum annual waste acceptance). The actual closure of the landfill will depend upon volume remaining. Facility-related traffic projections for 2072 were developed by scaling 2024 baseline traffic and tonnage data proportionally to the proposed maximum annual tonnage, ensuring consistency with the original permit traffic study methodology (Permit Part II Appendix G).

Table 1 presents daily facility traffic as a percentage of total daily traffic for each roadway segment. The analysis demonstrates that while facility traffic increases on all segments (e.g., Mayhill Rd IH 35E to Colorado Blvd rises from 2.7% in 2089 to 4.7% in 2072), the proportion remains generally moderate, except for Spencer Rd where it reaches 21.2%. However, this value represents the conservative assumption that 100% of facility traffic accesses the site via Spencer Road, which is not expected under actual operating conditions. Based on existing traffic patterns and roadway access configuration, it is reasonably expected that Spencer Road would carry substantially less than the total facility traffic volume, potentially approximately one-third of the total facility-related traffic, resulting in an estimated contribution of approximately 7.0% of total daily traffic.

Tables 2 and 3 show peak hour volume-to-capacity (V/C) ratios and Level of Service (LOS) ratings for the respective closure years by direction. These tables show that V/C ratios exhibit minimal changes, generally within ± 0.02 , with slight improvements in some corridors, such as Loop 288 Northbound (V/C decreasing from 0.84 to 0.79, LOS improving from E to D) and negligible decreases in others like Spencer Rd Eastbound (V/C increasing from 0.64 to 0.67, LOS decreasing from C to D). This demonstration indicates that changes in V/C ratios are minimal, ranging from approximately -0.06 to +0.04 across all evaluated locations. These incremental changes are expected to be insignificant and are not expected to result in measurable degradation of roadway performance or LOS.

Overall, roadway capacity and LOS remain stable or improve slightly despite increased facility traffic volumes, indicating existing transportation infrastructure is adequate to accommodate the increased waste acceptance rate without materially degrading traffic operations. This analysis satisfies the requirements of 30 TAC § 330.125(h), providing a clear demonstration that the proposed permit modification will not result in unacceptable traffic impacts and complies with TCEQ’s standards for public health and safety.

Table 1: Total Facility Traffic as Percentage of Daily Traffic

Roadway	2016 Daily Volume	2016 Daily Facility Traffic¹	Percent	Daily Traffic Volume for Projected Closure Year 2089	Daily Facility Traffic for Currently Permitted 1590B Projected Closure Year 2089¹	Percent	Daily Volume for Revised Projected Closure Year 2072	Daily Facility Traffic for Revised Projected Closure Year 2072¹	Percent
Mayhill Rd- IH 35E to Colorado Blvd	21,850	814	3.7%	49,570	1,360	2.7%	44,837	2,102	4.7%
Mayhill Rd- Colorado Blvd to Spencer Rd	14,490	814	5.6%	39,000	1,360	3.5%	35,086	2,102	6.0%
Mayhill Rd- Spencer Rd to FM 426	13,760	814	5.9%	38,170	1,360	3.6%	34,320	2,102	6.1%
Mayhill Rd- North of FM 426	9,520	814	8.6%	24,840	1,360	5.5%	22,095	2,102	9.5%
Spencer Rd - Loop 288 to Mayhill Rd	5,160	814	15.8%	11,640	1,360	11.7%	9,928	2,102	21.2%
Colorado Blvd - Mayhill Rd to Brinker Rd	10,030	814	8.1%	19,690	1,360	6.9%	17,352	2,102	12.1%
Loop 288 -IH35E to Spencer Rd	37,350	814	2.2%	62,260	1,360	2.2%	56,474	2,102	3.7%
Loop 288 -Spencer Rd to FM426	42,490	814	1.9%	80,670	1,360	1.7%	73,413	2,102	2.9%
FM426 - Loop 288 to Mayhill Rd	14,480	814	5.6%	39,910	1,360	3.4%	35,941	2,102	5.8%
FM426 - East of Mayhill Rd	13,170	814	6.2%	40,940	1,360	3.3%	36,883	2,102	5.7%
IH35E - near Mayhill Rd	113,280	814	0.7%	230,200	1,360	0.6%	210,930	2,102	1.0%

1. It was assumed that all facility traffic will occur on each roadway link, consistent with the original traffic study in the permit Part II.G.

Table 2: Currently Permitted Closure Year Conditions (Permit Part II Appendix G – Traffic Study)

Roadway	Roadway Capacity (vph) Total	Direction	Roadway Capacity (vph)	Peak Hour Volume Background Traffic for Currently Permitted 1590B Projected Closure Year 2089	Peak Hour Total Volume w Facility Traffic for Currently Permitted 1590B Projected Closure Year 2089	V/C	LOS
Mayhill Rd- IH 35E to Colorado Blvd	4,440	NB	2220	1,235	1,281	0.58	C
		SB	2220	1,517	1,563	0.70	D
Mayhill Rd- Colorado Blvd to Spencer Rd	4,440	NB	2220	679	725	0.33	A/B
		SB	2220	849	895	0.40	A/B
Mayhill Rd- Spencer Rd to FM 426	4,440	NB	2220	670	716	0.32	A/B
		SB	2220	780	826	0.37	A/B
Mayhill Rd- North of FM 426	4,440	NB	2220	477	523	0.24	A/B
		SB	2220	592	638	0.29	A/B
Spencer Rd - Loop 288 to Mayhill Rd	1,260	EB	630	354	400	0.64	C
		WB	630	491	537	0.85	E
Colorado Blvd - Mayhill Rd to Brinker Rd	4,320	EB	2160	771	817	0.38	A/B
		WB	2160	648	694	0.32	A/B
Loop 288 -IH35E to Spencer Rd	6,660	NB	3330	2,452	2,498	0.75	D
		SB	3330	2,976	3,022	0.91	E
Loop 288 -Spencer Rd to FM426	6,660	NB	3330	2,743	2,789	0.84	E
		SB	3330	3,281	3,327	1.00	E
FM426 - Loop 288 to Mayhill Rd	4,200	EB	2100	787	833	0.40	A/B
		WB	2100	865	911	0.43	A/B
FM426 - East of Mayhill Rd	4,200	EB	2100	559	605	0.29	A/B
		WB	2100	699	745	0.35	A/B
IH35E - near Mayhill Rd	21,360	NB	10680	7,463	7,509	0.70	D
		SB	10680	6,346	6,392	0.60	C

Table 3: Proposed Closure Year Conditions

Roadway	Roadway Capacity (vph) Total	Direction	Roadway Capacity (vph)	Projected Facility Traffic for Revised Projected Closure Year 2072	Peak Hour Total Volume w Facility Traffic for Revised Projected Closure Year 2072	V/C	LOS	Change in V/C
Mayhill Rd- IH 35E to Colorado Blvd	4,440	NB	2220	1,140	1,238	0.56	C	-0.02
		SB	2220	1,401	1,499	0.68	D	-0.03
Mayhill Rd- Colorado Blvd to Spencer Rd	4,440	NB	2220	627	725	0.33	A/B	0.00
		SB	2220	784	882	0.40	A/B	-0.01
Mayhill Rd- Spencer Rd to FM 426	4,440	NB	2220	619	717	0.32	A/B	0.00
		SB	2220	720	818	0.37	A/B	0.00
Mayhill Rd- North of FM 426	4,440	NB	2220	441	539	0.24	A/B	0.01
		SB	2220	546	644	0.29	A/B	0.00
<u>Spencer Rd - Loop 288 to Mayhill Rd</u>	<u>1,260</u>	EB	630	327	425	0.67	D	0.04
		WB	630	453	551	0.87	E	0.02
Colorado Blvd - Mayhill Rd to Brinker Rd	4,320	EB	2160	712	810	0.37	A/B	0.00
		WB	2160	598	696	0.32	A/B	0.00
Loop 288 -IH35E to Spencer Rd	6,660	NB	3330	2,264	2,362	0.71	D	-0.04
		SB	3330	2,748	2,846	0.85	E	-0.05
<u>Loop 288 -Spencer Rd to FM426</u>	<u>6,660</u>	NB	3330	2,533	2,631	0.79	D	-0.05
		SB	3330	3,030	3,128	0.94	E	-0.06
FM426 - Loop 288 to Mayhill Rd	4,200	EB	2100	726	824	0.39	A/B	0.00
		WB	2100	799	897	0.43	A/B	-0.01
FM426 - East of Mayhill Rd	4,200	EB	2100	528	626	0.30	A/B	0.01
		WB	2100	659	757	0.36	A/B	0.01
IH35E - near Mayhill Rd	21,360	NB	10680	7,030	7,128	0.67	D	-0.04
		SB	10680	5,978	6,076	0.57	C	-0.03

The original version of the NOD 1 response, along with two (2) copies of the unmarked version of the revised sheets are enclosed, along with one (1) redline/strikeout version of the revised sheets, marked to denote changes.

If you have comments, questions, or need further information, please contact me directly at ssamir@parkhill.com or 469-200-7369.

Sincerely,

PARKHILL

By 

Sonia Samir, PE, PhD
Civil Engineer | Associate

SS/bs

Enclosure: MSW Permit Modification Application with Notice, NOD 1 Response
Mailing Labels

Cc: Brenda Haney, PE, Director of Solid Waste, City of Denton
Randall Morris, Landfill Manager, City of Denton
Arturo (Art) Garcia, Site Ops/HCC Manager, City of Denton
Ami Reeder, Regulatory Compliance Manager, City of Denton
Frank Pugsley, PE, Sector Director, Parkhill



Texas Commission on Environmental Quality

Application Form for Municipal Solid Waste Permit or Registration Modification or Temporary Authorization

Application Tracking Information

Facility Name: City of Denton ECO-W.E.R.C.S. Complex

Permittee or Registrant Name: City of Denton

MSW Authorization Number: 1590B

Initial Submission Date: 03/19/2026

Revision Date: 5/26/2026

Instructions for completing this form are provided in [form TCEQ-20650-instr](#)¹. If you have questions, contact the Municipal Solid Waste Permits Section by email to mswper@tceq.texas.gov, or by phone at 512-239-2335.

Application Data

1. Submission Type
☐ Initial Submission ☒ Notice of Deficiency (NOD) Response
2. Authorization Type
☒ Permit ☐ Registration
3. Application Type
☒ Modification with Public Notice ☐ Modification without Public Notice
☐ Temporary Authorization (TA) ☐ Modification for Name Change or Transfer
4. Application Fee
Amount The application fee for a modification or temporary authorization is \$150.
Payment Method ☐ Check ☒ Online through ePay portal www3.tceq.texas.gov/epay/ If paid online, enter ePay Trace Number: <u>582EA000725341</u>

¹ www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/20650-instr.pdf

5. Electronic Versions of Application

For modifications that require public notice, TCEQ will publish electronic versions of the applications online. Applicants must provide complete electronic copies of their initial applications, responses to notices of deficiencies, and the final technically complete versions. (Refer to instructions for this form for how to submit electronically.)

6. Party Responsible for Mailing Notice

For modifications that require notice, indicate who will be responsible for mailing notice:

☒ Applicant

☐ Agent in Service

☐ Consultant

Contact Name: Brenda Haney

Title: Director of Solid Waste

Email Address: [REDACTED]

7. Confidential Documents

Does the application contain confidential documents?

☐ Yes ☒ No

If "Yes", reference the confidential documents in the application, but submit the confidential documents as an attachment in a separate binder marked "CONFIDENTIAL."

8. Facility General Information

Facility Name: City of Denton ECO-W.E.R.C.S. Complex

Contact Name: Brenda Haney Title: Director of Solid Waste

MSW Authorization Number (if existing): 1590B

Regulated Entity Reference Number: **RN** 102212685

Physical or Street Address: 1527 S Mayhill Rd

City: Denton County: Denton State: TX Zip Code: 76208

Phone Number: 9403498056

Latitude (Decimal Degrees): N33° 11' 39.3"

Longitude (Decimal Degrees): W97° 05' 4.9"

9. Facility Types

☒ Type I

☐ Type IV

☐ Type V

☐ Type IAE

☐ Type IVAE

☐ Type VI

10. Description of the Revisions to the Facility

Provide a brief description of revisions to permit or registration conditions and supporting documents referred to by the permit or registration, and a reference to the specific provisions under which the modification or temporary authorization application is being made. Also, provide an explanation of why the modification or temporary authorization is needed:

The City of Denton is requesting a Permit Modification with Notice for the above-referenced landfill permit, in accordance with 30 TAC §330.125(h) and 30 TAC §305.70(i), to revise the estimated waste acceptance rate. This permit modification requests an increase in the maximum waste acceptance to 2,500 tons per day (912,500 tons per year) to meet the current and future disposal needs of the City of Denton Landfill. These proposed changes do not alter the permit conditions or reduce the facility's capability to protect human health and the environment.

11. Facility Contact Information

Site Operator (Permittee or Registrant)

Name: City of Denton

Customer Reference Number: **CN** 600358980

Contact Name: Brenda Haney Title: Director Solid Waste

Mailing Address: 1527 S Mayhill Rd

City: Denton County: Denton State: TX Zip Code: 76208

Phone Number: (940)349-8056

Email Address: [REDACTED]

Texas Secretary of State (SOS) Filing Number: _____

Operator (if different from Site Operator)

Name: _____

Customer Reference Number: **CN** _____

Contact Name: _____ Title: _____

Mailing Address: _____

City: _____ County: _____ State: _____ Zip Code: _____

Phone Number: _____

Email Address: _____

Texas Secretary of State (SOS) Filing Number: _____

Consultant (if applicable)Firm Name: ParkhillConsultant Name: Sonia SamirTexas Board of Professional Engineers Firm Registration Number: F-560Contact Name: Sonia Samir Title: Civil Engineer | AssociateMailing Address: 5844 John Hickman Pkwy, Suite 500City: Frisco County: Collin State: TX Zip Code: 75034Phone Number: (469) 200-7369Email Address: [REDACTED]**Agent in Service (required for out-of-state applicants)**

Name: _____

Mailing Address: _____

City: _____ County: _____ State: TX Zip Code: _____

Phone Number: _____

Email Address: _____

12. Ownership Status of the Facility

Is this a modification that changes the legal description, the property owner, or the Site Operator (Permittee or Registrant)?

☐ Yes ☒ No

If the answer is "No", skip the next question and proceed to signature page.

Does the Site Operator (Permittee or Registrant) own all the facility units and all the facility property?

☒ Yes ☐ No

If "No", provide the following information for other owners.

Owner Name: _____

Mailing Address: _____

City: _____ County: _____ State: TX Zip Code: _____

Phone Number: _____

Email Address: _____

Signature Page

Site Operator or Authorized Signatory

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Brenda Haney Title: Director of Solid Waste

Email Address: [REDACTED]

Signature: [Signature] Date: 26 May 2026

Operator or Principal Executive Officer Designation of Authorized Signatory

To be completed by the operator if the application is signed by an authorized representative for the operator.

I hereby designate _____ as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Operator or Principal Executive Officer Name: _____

Email Address: _____

Signature: _____ Date: _____

Notary

SUBSCRIBED AND SWORN to before me by the said Brenda Haney

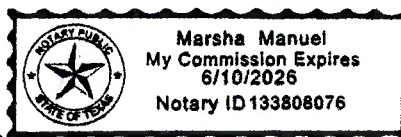
On this 26 day of May, 2026

My commission expires on the 10 day of JUNE, 2026

[Signature]

Notary Public in and for

DENTON County, Texas



Note: Application Must Bear Signature and Seal of Notary Public

Attachments for Permit or Registration Modification with Public Notice

Refer to instruction document **200650-instr** for professional engineer seal requirements.

Attachments Table 1. Required attachments.

Required Attachments	Attachment Number
Land Ownership Map	4
Landowners List	4
Marked (Redline/Strikeout) Pages	2
Unmarked Revised Pages	3

Attachments Table 2. Additional attachments as applicable.

Additional Attachments as Applicable (select all that apply and add others as needed)	Attachment Number
☐ TCEQ Core Data Form(s)	
☐ Signatory Authority Delegation	
☒ Fee Payment Receipt	1
☐ Confidential Documents	

Attachments for Permit or Registration Modification without Public Notice, or Temporary Authorization

Refer to instruction document **200650-instr** for professional engineer seal requirements.

Attachments Table 3. Required attachments for modifications.

Required Attachments for Modification	Attachment Number
Marked (Redline/Strikeout) Pages	
Unmarked Revised Pages	

Attachments Table 4. Additional attachments for modifications and temporary authorizations, as applicable.

Additional Attachments as Applicable (select all that apply and add others as needed)	Attachment Number
☐ TCEQ Core Data Form(s)	
☐ Signatory Authority Delegation	
☐ Fee Payment Receipt	
☐ Confidential Documents	

Attachments for Permit or Registration Name Change or Transfer Modification

Refer to instruction document **200650-instr** for professional engineer seal requirements.

Attachments Table 5. Required attachments.

Required Attachments	Attachment Number
TCEQ Core Data Form(s)	
Property Legal Description	
Property Metes and Bounds Description	
Metes and Bounds Drawings	
On-Site Easements Drawing	
Land Ownership Map	
Land Ownership List	
Property Owner Affidavit	
Verification of Legal Status	
Evidence of Competency	

Attachments Table 6. Additional attachments as applicable.

Additional Attachments as Applicable (select all that apply and add others as needed)	Attachment Number
☐ Signatory Authority Delegation	
☐ Fee Payment Receipt	
☐ Confidential Documents	
☐ Final Plat Record of Property	
☐ Assumed Name Certificate	

ATTACHMENT 2: MARKED (REDLINE/STRIKEOUT) PAGES

TYPE I PERMIT APPLICATION

CITY OF DENTON ECO-W.E.R.C.S

(Waste to Energy, Recycling, Composting, and Solar Complex)

TCEQ MSW Permit Application No. 1590B

Denton County, Texas

PART II – Waste Acceptance Plan and Existing Conditions Summary

Prepared for:

City of Denton
1527 South Mayhill Road
Denton, Texas 76208

Prepared by:

Parkhill
5844 John Hickman Pkwy, Suite 500
Frisco, Texas 75034
TBPE F-560

PART II – WASTE ACCEPTANCE PLAN AND
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Year	MSW Tonnage Accepted at <u>Complex Gates</u>¹	MSW Tonnage Disposed in <u>Landfill</u>²
2018	384,771	279,298
2019	317,637	292,189
2020	413,889	388,067
2021	443,177	436,674
2022	485,716	458,869
2023	382,410	357,369
2024	371,382	340,360
2025	421,585	394,065

¹ Actual tonnage from scale house receipts

² Actual tonnage from annual reports

TABLE 2 – ESTIMATED TONNAGES FOR NEXT 5 YEARS

Year	Estimated MSW Tonnage Accepted at Complex Gates	Estimated MSW Tonnage Disposed in Landfill
2026	425,000-445,000	400,000-435,000
2027	430,000-450,000	405,000-440,000
2028	435,000-455,000	410,000-445,000
2029	440,000-460,000	415,000-450,000
2030	445,000-465,000	420,000-455,000

Table 2 shows estimates of growth and is not intended to limit the facility's waste acceptance rate.

2.1.3. Characteristics of the Waste Accepted §330.61(b)(1)

The complex accepts MSW, construction and demolition (C&D) waste, recyclables, white goods, bulk liquids, grease and grit trap waste, source separated organics (SSO) for composting and petroleum contaminated soil.

TYPE I PERMIT APPLICATION

CITY OF DENTON ECO-W.E.R.C.S

(Waste to Energy, Recycling, Composting, and Solar Complex)

TCEQ MSW Permit Application No. 1590B

Denton County, Texas

PART III – Site Development Plan

Prepared for:

City of Denton

1527 South Mayhill Road

Denton, Texas 76208

Prepared by:

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~~2600 Network Blvd~~ 5488 John Hickman Pkwy, Suite ~~190~~ 500

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TBPE F-560

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PARKHILL **SMITH** & COOPER

PART III – SITE DEVELOPMENT PLAN

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As of ~~January 2013~~end of 2025, the remaining landfill airspace ~~and waste capacity~~ is approximately ~~48,234,246 cubic yards and 42,475,241~~42,659,637 cubic yards ~~respectively~~.

TABLE 6 – LANDFILL LIFE CALCULATIONS

Year	Total Population Served	Net Tonnage for Disposal	Total Airspace Consumed, cy	Solid Waste Airspace Consumed, cy	Total Airspace Remaining, cy	End-of-Year Solid Waste Airspace Remaining, cy
2003		107,891	4,710,748	4,197,277	12,064,067	8,874,558
2004		125,623	4,920,120	4,383,827	11,854,695	8,688,008
2005		117,886	5,116,596	4,558,887	11,658,219	8,512,948
2006		115,338	5,308,826	4,730,164	11,465,989	8,341,671
2007		127,820	5,521,859	4,919,976	11,252,956	8,151,859
2008		131,294	5,740,682	5,114,948	11,034,133	7,956,887
2009		160,596	6,008,342	5,353,433	10,766,473	7,718,402
2010	6,132,183	143,130	6,246,892	5,565,981	10,527,923	7,505,854
2011	6,234,590	147,838	6,493,289	5,785,520	10,281,526	7,286,315
2012	6,234,590	166,022	6,769,992	6,032,063	10,004,823	7,039,772
2013	6,234,590	176,509	7,064,174	6,294,179	9,710,641	6,777,656
2014	6,338,708	191,250	7,382,924	6,578,185	9,391,891	6,493,650
2015	6,444,565	231,990	7,769,574	6,922,690	9,005,241	6,149,145
2016	6,552,189	235,864	8,162,681	7,272,949	47,135,739	39,419,254
2017	6,661,610	239,803	8,562,353	7,629,057	46,736,067	39,063,146
2018	6,772,859	243,808	8,968,699	7,991,111	46,329,721	38,701,092
2019	6,885,966	247,879	9,381,832	8,359,212	45,916,588	38,332,991
2020	7,000,962	252,019	9,801,864	8,733,461	45,496,556	37,958,742
2030	8,005,625	288,185	14,327,033	12,765,387	40,971,387	33,926,816
2040	9,037,713	325,338	19,464,487	17,342,858	35,833,933	29,349,345
2050	9,787,322	352,322	25,131,179	22,391,881	30,167,241	24,300,322
2060	10,940,432	393,831	31,377,357	27,957,225	23,921,063	18,734,978
2070	12,085,044	435,035	38,313,273	34,137,127	16,985,147	12,555,076
2080	13,349,407	480,549	45,974,840	40,963,582	9,323,580	5,728,621
2088	14,455,494	520,366	52,677,318	46,692,203	2,621,102	0

City of Denton
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<u>Year</u>	<u>Projected Annual Disposal at the Landfill</u>	<u>Projected Average Daily Disposal at the Landfill</u>	<u>Cumulative Tonnage</u>	<u>Tonnage Remaining^A</u>	<u>Airspace Used (CY)</u>	<u>Cumulative Airspace Used (CY)</u>	<u>Remaining Airspace^A (CY)</u>
2025				27,387,487			42,659,637
2026	401,631	1,100	401,631	26,985,856	625,594	625,594	42,034,043
2027	408,580	1,119	810,211	26,577,276	636,417	1,262,011	41,397,626
2028	415,649	1,139	1,225,860	26,161,627	647,428	1,909,439	40,750,198
2029	422,840	1,158	1,648,700	25,738,787	658,629	2,568,069	40,091,568
2030	430,156	1,179	2,078,856	25,308,631	670,025	3,238,094	39,421,543
2031	437,598	1,199	2,516,454	24,871,033	681,617	3,919,710	38,739,927
2032	445,169	1,220	2,961,623	24,425,864	693,410	4,613,120	38,046,517
2033	452,871	1,241	3,414,494	23,972,993	705,407	5,318,527	37,341,110
2034	460,706	1,262	3,875,200	23,512,287	717,611	6,036,137	36,623,500
2035	468,677	1,284	4,343,877	23,043,610	730,026	6,766,164	35,893,473
2036	476,786	1,306	4,820,663	22,566,824	742,657	7,508,821	35,150,816
2037	485,035	1,329	5,305,698	22,081,789	755,506	8,264,327	34,395,310
2038	493,427	1,352	5,799,125	21,588,362	768,578	9,032,905	33,626,732
2039	501,964	1,375	6,301,089	21,086,398	781,875	9,814,780	32,844,857
2040	510,648	1,399	6,811,737	20,575,750	795,402	10,610,182	32,049,455
2050	606,200	1,661	12,430,243	14,957,244	944,237	19,361,749	23,297,888
2060	719,632	1,972	19,100,079	8,287,408	1,120,922	29,750,902	12,908,735
2070	854,287	2,340	27,017,962	369,525	1,330,665	42,084,053	575,584
2071	369,525	2,381	27,387,487	0	575,584	42,659,637	0

A. Remaining at end of year.

It should be noted that the actual life will depend on several estimated variables, such as population growth, use of alternate daily cover (as described in the SOP), efficiency of compaction equipment, recycling, diversion efforts, extent of landfill mining, etc.

TYPE I PERMIT APPLICATION

CITY OF DENTON ECO-W.E.R.C.S

(Waste to Energy, Recycling, Composting, and Solar Complex)

TCEQ MSW Permit Application No. 1590B

Denton County, Texas

PART IV – Site Operating Plan

Prepared for:

City of Denton
1527 South Mayhill Road
Denton, Texas 76208

Prepared by:

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5844 John Hickman Pkwy, Suite 500
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TBPE F-560

Prepared ~~—~~ May 2019

Revised ~~—March~~ May 2026

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4. Waste Acceptance Rates §330.125(h)

The Facility Operating Record will include records documenting the annual waste acceptance rates at the Facility to aid in providing the correct balance of available on-site equipment, personnel, and other provisions related to implementing this SOP. The waste acceptance rate reports show total waste in tons and include all waste accepted for disposal at the site.

~~The Estimated range of maximum annual waste accepted-acceptance rate for disposal~~
at the ~~site landfill~~ is ~~912,500 tons, equivalent to an average of -between 250 tons per day~~
~~and 2,500 tons per day~~. The Facility permit does not establish a maximum annual waste
acceptance rate, nor does it restrict acceptance. Table 3 shows the amount of waste
disposed at the Landfill site in each of the past ten TCEQ Fiscal Years. TCEQ Fiscal
Years run from September 1st to August 31st. The table also includes projected waste
acceptance rates for each of the next five years. Daily tonnage is calculated on an annual
average basis ~~(Annual total ÷ operating days)~~.

ATTACHMENT 3: UNMARKED REVISED PAGES

TYPE I PERMIT APPLICATION

CITY OF DENTON ECO-W.E.R.C.S

(Waste to Energy, Recycling, Composting, and Solar Complex)

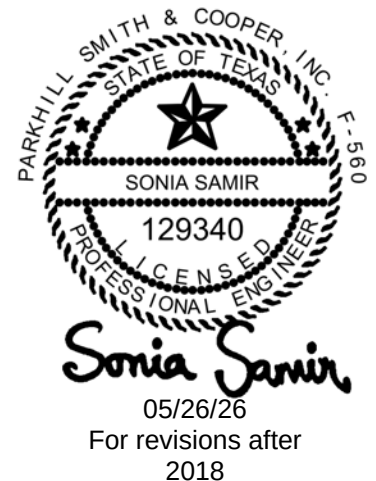
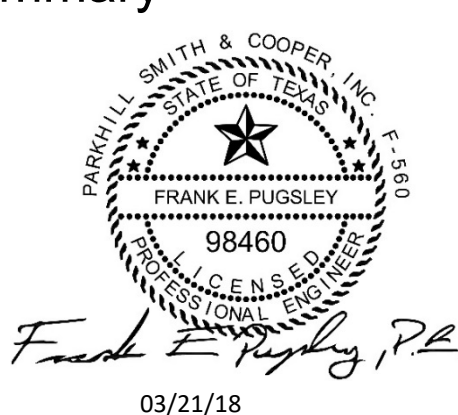
TCEQ MSW Permit Application No. 1590B

Denton County, Texas

PART II – Waste Acceptance Plan and Existing Conditions Summary

Prepared for:

City of Denton
1527 South Mayhill Road
Denton, Texas 76208



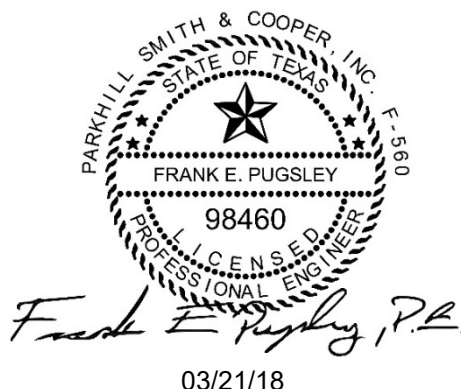
Prepared by:

Parkhill
5844 John Hickman Pkwy, Suite 500
Frisco, Texas 75034
TBPE F-560

**PART II – WASTE ACCEPTANCE PLAN AND
EXISTING CONDITIONS SUMMARY**

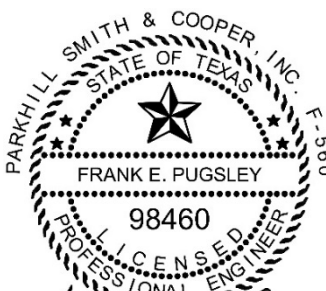
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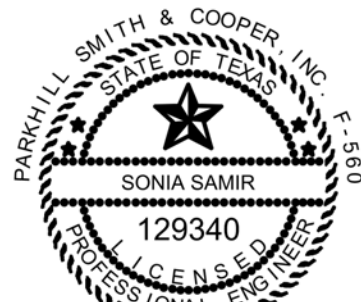
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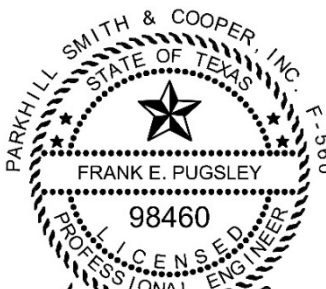
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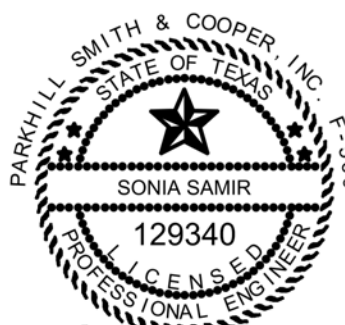

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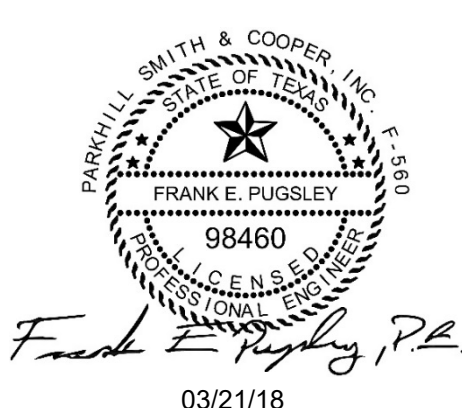
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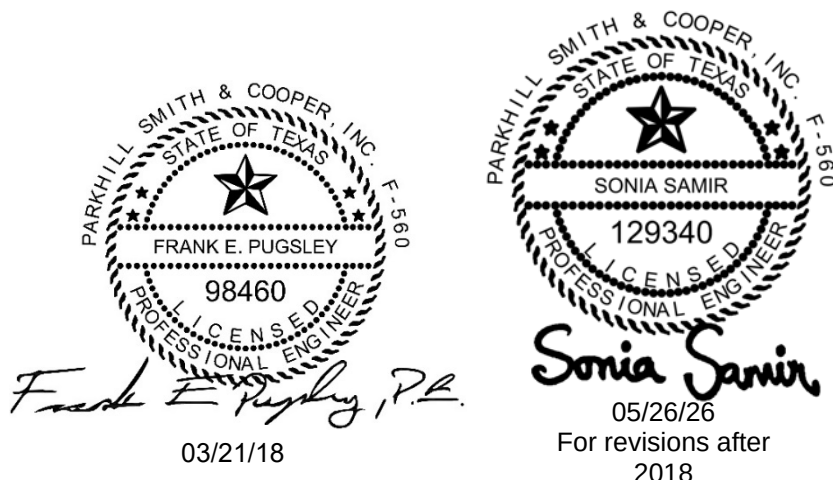


TABLE 1 – TONNAGES FOR PREVIOUS 8 YEARS

Year	MSW Tonnage Accepted at Complex Gates¹	MSW Tonnage Disposed in Landfill²
2018	384,771	279,298
2019	317,637	292,189
2020	413,889	388,067
2021	443,177	436,674
2022	485,716	458,869
2023	382,410	357,369
2024	371,382	340,360
2025	421,585	394,065

¹ Actual tonnage from scale house receipts

² Actual tonnage from annual reports

TABLE 2 – ESTIMATED TONNAGES FOR NEXT 5 YEARS

Year	Estimated MSW Tonnage Accepted at Complex Gates	Estimated MSW Tonnage Disposed in Landfill
2026	425,000-445,000	400,000-435,000
2027	430,000-450,000	405,000-440,000
2028	435,000-455,000	410,000-445,000
2029	440,000-460,000	415,000-450,000
2030	445,000-465,000	420,000-455,000

Table 2 shows estimates of growth and is not intended to limit the facility's waste acceptance rate.

2.1.3. Characteristics of the Waste Accepted §330.61(b)(1)

The complex accepts MSW, construction and demolition (C&D) waste, recyclables, white goods, bulk liquids, grease and grit trap waste, source separated organics (SSO) for composting and petroleum contaminated soil.

TYPE I PERMIT APPLICATION

CITY OF DENTON ECO-W.E.R.C.S

(Waste to Energy, Recycling, Composting, and Solar Complex)

TCEQ MSW Permit Application No. 1590B

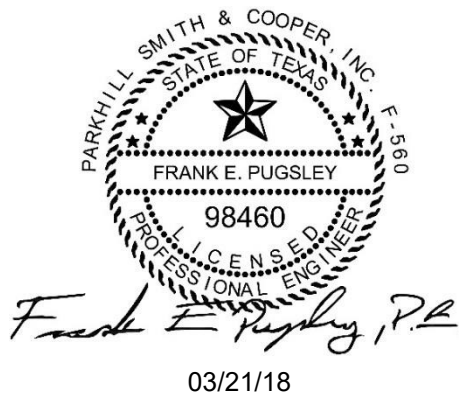
Denton County, Texas

PART III – Site Development Plan

Prepared for:

City of Denton

1527 South Mayhill Road
Denton, Texas 76208



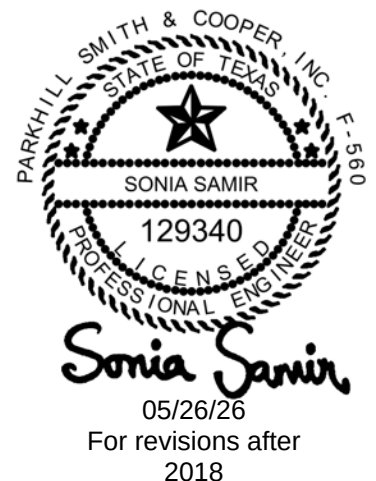
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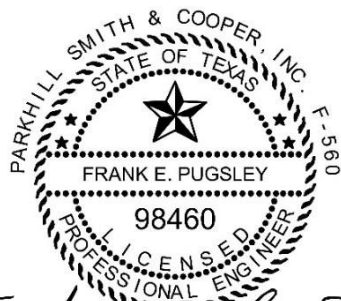
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PART III – SITE DEVELOPMENT PLAN

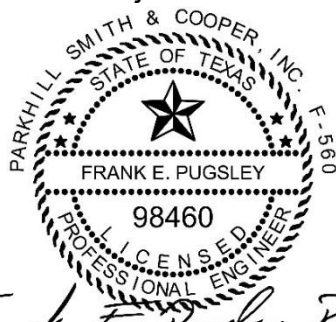
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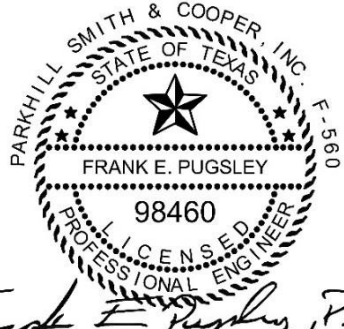

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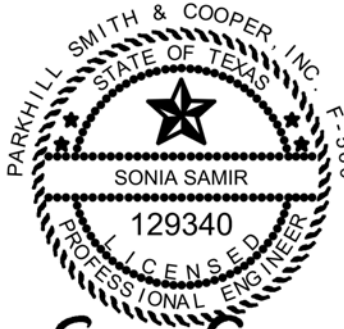
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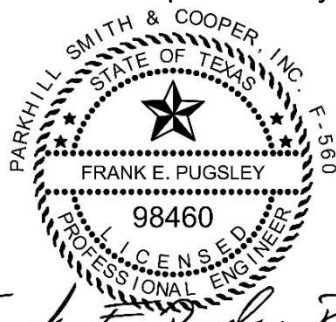
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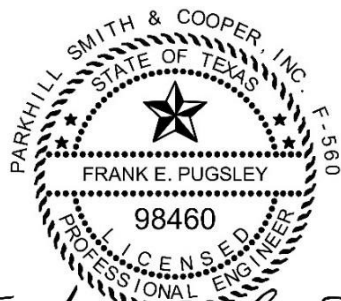
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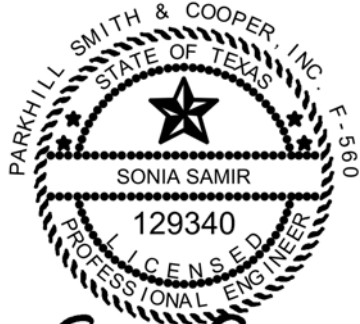
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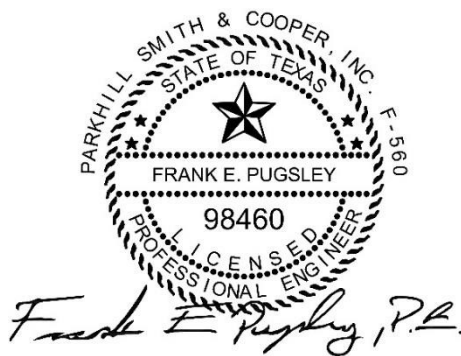
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Sonia Samir
05/26/26
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2018

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05/26/26

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City of Denton
ECO-W.E.R.C.S. COMPLEX
TCEQ MSW Permit No. 1590B
May 2026

As of end of 2025, the remaining landfill airspace is approximately 42,659,637 cubic yards.

TABLE 6 – LANDFILL LIFE CALCULATIONS

Year	Projected Annual Disposal at the Landfill	Projected Average Daily Disposal at the Landfill	Cumulative Tonnage	Tonnage Remaining ^A	Airspace Used (CY)	Cumulative Airspace Used (CY)	Remaining Airspace ^A (CY)
2025				27,387,487			42,659,637
2026	401,631	1,100	401,631	26,985,856	625,594	625,594	42,034,043
2027	408,580	1,119	810,211	26,577,276	636,417	1,262,011	41,397,626
2028	415,649	1,139	1,225,860	26,161,627	647,428	1,909,439	40,750,198
2029	422,840	1,158	1,648,700	25,738,787	658,629	2,568,069	40,091,568
2030	430,156	1,179	2,078,856	25,308,631	670,025	3,238,094	39,421,543
2031	437,598	1,199	2,516,454	24,871,033	681,617	3,919,710	38,739,927
2032	445,169	1,220	2,961,623	24,425,864	693,410	4,613,120	38,046,517
2033	452,871	1,241	3,414,494	23,972,993	705,407	5,318,527	37,341,110
2034	460,706	1,262	3,875,200	23,512,287	717,611	6,036,137	36,623,500
2035	468,677	1,284	4,343,877	23,043,610	730,026	6,766,164	35,893,473
2036	476,786	1,306	4,820,663	22,566,824	742,657	7,508,821	35,150,816
2037	485,035	1,329	5,305,698	22,081,789	755,506	8,264,327	34,395,310
2038	493,427	1,352	5,799,125	21,588,362	768,578	9,032,905	33,626,732
2039	501,964	1,375	6,301,089	21,086,398	781,875	9,814,780	32,844,857
2040	510,648	1,399	6,811,737	20,575,750	795,402	10,610,182	32,049,455
2050	606,200	1,661	12,430,243	14,957,244	944,237	19,361,749	23,297,888
2060	719,632	1,972	19,100,079	8,287,408	1,120,922	29,750,902	12,908,735
2070	854,287	2,340	27,017,962	369,525	1,330,665	42,084,053	575,584
2071	369,525	2,381	27,387,487	0	575,584	42,659,637	0

A. Remaining at end of year.

It should be noted that the actual life will depend on several estimated variables, such as population growth, use of alternate daily cover (as described in the SOP), efficiency of compaction equipment, recycling, diversion efforts, extent of landfill mining, etc.

TYPE I PERMIT APPLICATION

CITY OF DENTON ECO-W.E.R.C.S

(Waste to Energy, Recycling, Composting, and Solar Complex)

TCEQ MSW Permit Application No. 1590B

Denton County, Texas

PART IV – Site Operating Plan

Prepared for:

City of Denton
1527 South Mayhill Road
Denton, Texas 76208

Prepared by:

Parkhill
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Frisco, Texas 75034
TBPE F-560



Prepared – May 2019

Revised – May 2026

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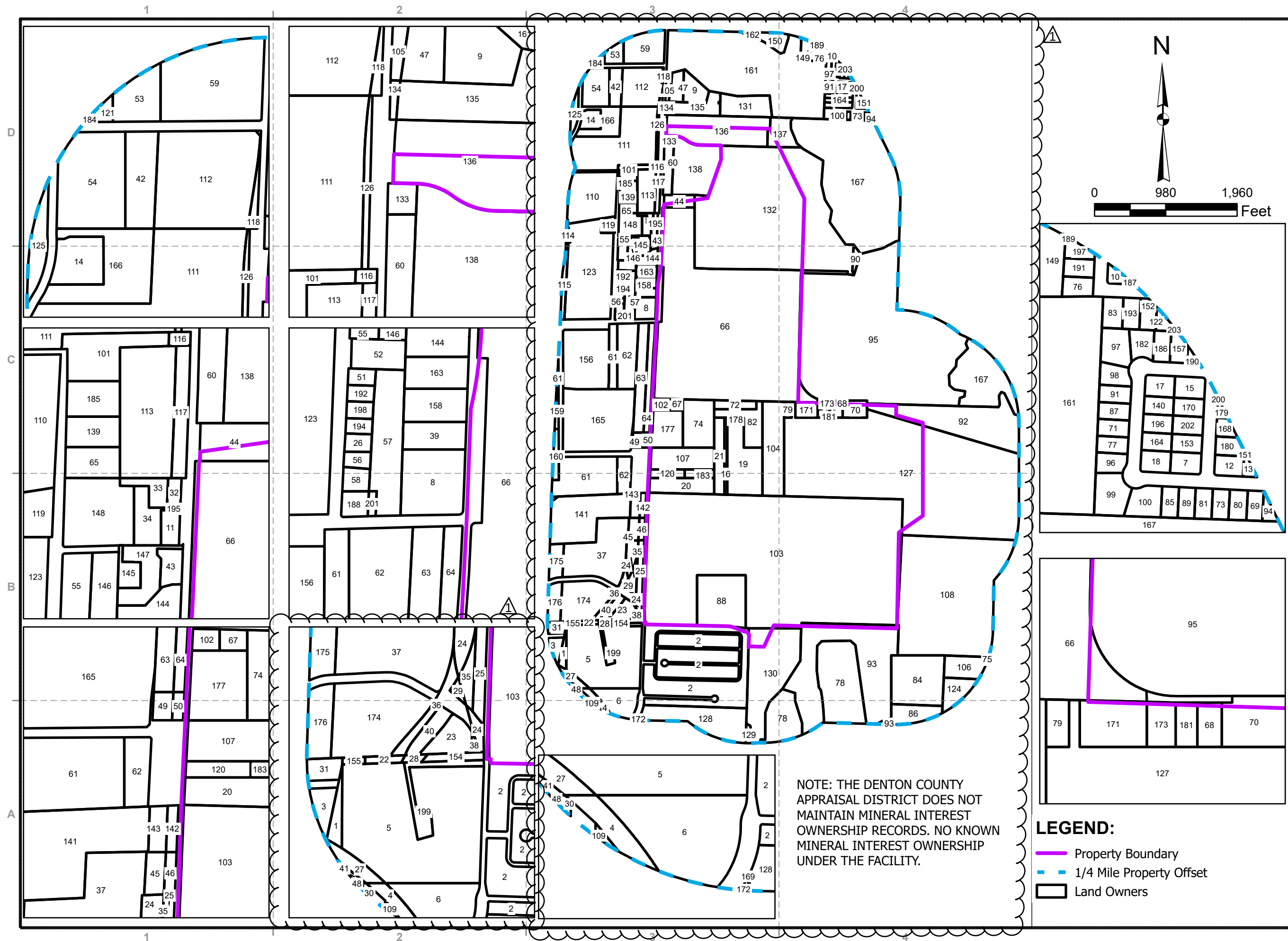


4. Waste Acceptance Rates §330.125(h)

The Facility Operating Record will include records documenting the annual waste acceptance rates at the Facility to aid in providing the correct balance of available on-site equipment, personnel, and other provisions related to implementing this SOP. The waste acceptance rate reports show total waste in tons and include all waste accepted for disposal at the site.

Estimated maximum annual waste acceptance rate for disposal at the landfill is 912,500 tons, equivalent to an average of 2,500 tons per day. The Facility permit does not establish a maximum annual waste acceptance rate, nor does it restrict acceptance. Table 3 shows the amount of waste disposed at the Landfill site in each of the past ten TCEQ Fiscal Years. TCEQ Fiscal Years run from September 1st to August 31st. The table also includes projected waste acceptance rates for each of the next five years. Daily tonnage is calculated on an annual average basis.

ATTACHMENT 4: LANDOWNERSHIP MAPS AND LIST



Parkhill



Sonia Samir
05/26/26

FOR PERMITTING PURPOSES ONLY

Parkhill.com

City of Denton
ECO-W.E.R.C.S Complex
MSW PERMIT No. 1590B

CLIENT

City of Denton

1527 South Mayhill Road
Denton, Texas
76208

PROJECT NO.

45505.25

MAY 2026 NOD 1 RESPONSE

DATE DESCRIPTION

Land Ownership
Map

Figure 4.1

BRITTAIN, BRENDA
7798 TRUAX CIR
ARGYLE, TX 76226-4323

PECAN CREEK LLC
31200 NORTHWESTERN HWY
FARMINGTON HILLS, MI 48334-5900

AT OWNER 18 LP
591 W PUTNAM AVE
GREENWICH, CT 06830-6005

DALLAS AREA RAPID TRANSIT
PO BOX 660163
DALLAS, TX 75266-0163

CITY OF DENTON
215 E MCKINNEY ST
DENTON, TX 76201-4229

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ARLINGTON, TX 76006-2773

HUNNICUTT, LUZ J & BEVERLY
GRIEGO
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1717 EDINBURG CT
ALLEN, TX 75013-5336

FEDERAL LAND BANK ASN
PO BOX A
DENTON, TX 76202-1646

MORROW, PHILLIP D & REBECCA
5216 PAULIE DR
DENTON, TX 76208-6408

LSC-DENTON 55 PLUS DST
170 N RADNOR CHESTER RD
RANDOR, PA 19087-5280

SUSAR FARMS, INC
5493 EDWARDS RD
DENTON, TX 76208-5949

THE PRESTIGE BUILD LLC
9720 COIT RD STE 220
PLANO, TX 75025

KUKAHI CORPORATE SOLUTIONS
INC
7131 COLLEYVILLE BLVD STE 103
COLLEYVILLE, TX 76034-6453

CROWN COMMUNICATIONS INC
4017 WASHINGTON RD PMB 353
MCMURRAY, PA 15317-2520

JOHNSON, TERRY D
1205 BRIDGES ST
DENTON, TX 76208-6202

NDWARU, EDWARD KAREGA &
KAREGA, CATHERINE WANJIKO
905 COLE AVE
DENTON, TX 76208-6421

MAYHILL ROAD ASSOCIATES LLC
2 COOPER ST 14TH FL
CAMDEN, NJ 08102-2348

TRAN, JOSEPH & MY HOANG,
CECILIA
2080 AMHERST DR
LEWISVILLE, TX 75067-6100

STRITTMATTER, JOSEPH &
TAWNYA
6378 MILAM RDG
SANGER, TX 76266-7470

WAGES, CATHERINE
3915 GAYLA LN
DENTON, TX 76208-6205

CANALES, BENJAMIN & DILCIA &
OSUALDO L CANALES BONILLA
5904 E MCKINNEY ST
DENTON, TX 76208-2408

GIVING GRACE HOLDINGS INC
1302 TEASLEY LN
DENTON, TX 76205-7946

BAKER, JOSHUA & BERAINE,
BRITTANY
912 JEFFREY DR
DENTON, TX 76208-6424

FLEMING, SEAN & JULIANA
720 CROSS TIMBERS DR
DOUBLE OAK, TX 75077-8455

ELLIS, EARL BRYAN & ELLIS,
BARBARA
912 GLENNGARY WAY
DENTON, TX 76208-6422

DENTON HOUSING AUTHORITY
1225 WILSON ST
DENTON, TX 76205-6255

BRODESS, SHIRLEY CLAIRE &
TYLER GRAHAM
5221 ABBY WAY
DENTON, TX 76208

NORTH TEXAS DEVELOPMENT PFC
1225 WILSON ST
DENTON, TX 76205-6255

GEP XI DENTON 2 LP
600 E LAS COLINAS BLVD
IRVING, TX 75039

BROWN, CHEYLON
913 COLE AVE
DENTON, TX 76208-6421

TUITT, KEITH
909 GLENNGARY WAY
DENTON, TX 76208-6423

SO, SAMANDA
904 GLENNGARY WAY
DENTON, TX 76208-6422

GRIFFITH, SHARON D & CURTIS W
905 GLENNGARY WAY
DENTON, TX 76208-6423

TRUE NORTH PROPERTY OWNER B
LLC
PO BOX 4090
SCOTTSDALE, AZ 85261

COLLAZO, JOSE TRINIDAD DAVILA
& LOPEZ, JAQUELINE DUENAS
5213 ABBY WAY
DENTON, TX 76208-6417

MILLER, DAVID RAY
1201 BRIDGES ST
DENTON, TX 76208

VALDEZ, LUIS GERARDO
5217 ABBY WAY
DENTON, TX 76208-6417

LAMARCHE, ELIZABETH A
5209 PAULIE DR
DENTON, TX 76208-6409

HAMMAD, SAED KA
2900 SPENCER RD
DENTON, TX 76208-6101

RAGLAND, DEDRA
800 KOSSMAN DR
DENTON, TX 76208-6406

WILLIAMS, KEVIN & TONYA
5225 ABBY WAY
DENTON, TX 76208-6417

RAMIREZ, CLAUDIO ANTONIO
ORTEGA & GALVAN, JANET ALINA
808 KOSSMAN DR
DENTON, TX 76208-6406

RIVAS, RUBEN
4675 LAKE BREEZE DR
MCKINNEY, TX 75071-3993

BENNETT, ROBERT & KELLY
5208 PAULIE DR
DENTON, TX 76208-6408

SAGL LLC
1313 BRIDGES ST
DENTON, TX 76208-6203

NORMAN, MARISA & NICHOLAS
909 COLE AVE
DENTON, TX 76208-6421

JIMENEZ, JUAN
804 KOSSMAN DR
DENTON, TX 76208-6406

MINASSIAN, PATIL K
116 MAPLE ST
DENTON, TX 76201-6826

ALDAMA, CAROLINA CLIMACO
901 GLENNGARY WAY
DENTON, TX 76208-6423

GUPTA, AMIT & SONAL
PO BOX 136
WEXFORD, PA 15090-0136

CADAR, CORNEL & DINA
5220 PAULIE DR
DENTON, TX 76208-6408