



Texas Commission on Environmental Quality
Correspondence Cover Sheet
Waste Permits Division

Date: April 2026
 Facility Name: City of Uvalde Landfill
 Permit, Registration, or
 Authorization No.: 1725

Nature of Submittal:
 Initial
 Deficiency Response to TCEQ Tracking No.: _____
 (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): <input type="checkbox"/> Landfill <input type="checkbox"/> Processor <input type="checkbox"/> Compost	<input type="checkbox"/> Alternative Daily Cover Status Report
<input type="checkbox"/> Registration Application (New)	<input type="checkbox"/> Closure Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Compost Report
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input checked="" type="checkbox"/> Modification with Public Notice	<input type="checkbox"/> Groundwater Corrective Action Report
<input type="checkbox"/> Modification without Public Notice	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Ownership Transfer/Name Change Modification	<input type="checkbox"/> Groundwater Background Evaluation Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Landfill Gas Corrective Action Report
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Landfill Gas Monitoring Report
Subchapter T: <input type="checkbox"/> Permit <input type="checkbox"/> Registration	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure	<input type="checkbox"/> Soil Boring Plan
Notice of Intent: <input type="checkbox"/> New <input type="checkbox"/> Revision <input type="checkbox"/> Closure	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Other Application:	<input type="checkbox"/> Other Report or Communication:

Table 2 - Industrial & Hazardous Waste Correspondence

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

April 2, 2026
File No. 16226047.00

Ms. Megan Henson Waste Permits Division
Texas Commission on Environmental Quality
12100 Park 35 Circle Building F
Austin, Texas 78753

Subject: City of Uvalde Landfill
Municipal Solid Waste (MSW) Permit No. 1725
Permit Modification to Address Revisions for use of Alternate Daily Cover (ADC)
Commercial Spray-on Product, VERDac Landfill Cover Pellets
Uvalde, Texas
CN600648455; RN102803921

Dear Ms. Henson:

On behalf of the City of Uvalde (City), SCS Engineers (SCS) has prepared the attached permit modification for City of Uvalde Landfill (landfill), TCEQ Permit No. 1725 in Uvalde County. This permit modification request has been prepared in accordance with Chapter 30 Texas Administrative Code (30 TAC) Section (§) 305.70(k)(1) related to the use of an alternate daily cover (ADC) material on a permanent basis in accordance with §330.165(d).

Specifically, this permit modification is being requested for the use of the commercial spray-on product, VERDac Landfill Cover Pellets (VERDac), as manufactured by LSC Environmental Products, LLC, as ADC. Part IV – Site Operating Plan, Attachment 2 was added to incorporate information related to VERDac as ADC.

In an effort to minimize the amount of time that the landfill will not be able to use the VERDac (i.e., between the last day of the temporary authorization extension [March 31, 2026] and approval of this permit modification), the City respectfully requests that this permit modification be reviewed and approved as expeditiously as possible and prior to submission of the final status report in April 2026.

This permit modification is being submitted subsequent to the documents listed below:

- TCEQ authorized the temporary authorization to use VERDac as ADC on March 7, 2025 (Tracking No. 30882966). This trial period was authorized to begin on March 22, 2025.
- In a letter dated March 17, 2025, SCS provided a 10-Day Notice of Intent to utilize VERDac as ADC to Mr. Jack Higginbotham, Waste Section Manager, TCEQ Region 13 office.
- A temporary authorization extension for this ADC was approved by TCEQ on September 25, 2025 (Tracking No. 31900907).
- Two-month written status reports regarding use of VERDac were submitted on July 16, August 12, October 7, and December 12, 2025, and February 17, 2026 (Tracking Nos. 31744314, 31806497, 31975488, 32387569, and 32667714, respectively).
- The final two-month status report will be submitted to TCEQ in April 2026.

Ms. Megan Henson
April 2, 2026
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Consistent with 30 TAC §305.70(d), this submittal addresses minor changes to the landfill that do not substantially alter the permit conditions and do not reduce the capability of the facility to protect human health and the environment. Based on our review of the regulations, this permit modification does require public notice; therefore, the adjacent landowners' list and map has been included in Attachment E.

Consistent with §305.70(f), we are submitting one original and two copies of the attached permit modification, with one of the copies marked to clearly show the above-described revisions using redline/strikeout format for narrative pages. Also, we have included a completed Application Form to support this modification. Lastly, in accordance with §330.59(h)(1), SCS has also remitted payment of the \$150.00 application fee through e-Pay (see Attachment A for receipt).

If you have questions or comments concerning this submittal, please contact Jennifer Brown, P.E. at 817-358-6130.

Sincerely,



Jennifer Brown, P.E.
Project Manager
SCS ENGINEERS
TBPE Registration No. F-3407



Eduardo Choquis, P.E.
Project Director II
SCS ENGINEERS

Attachments Attachment A: Permit Modification/Registration Application Form and E-Pay Receipt
Attachment B: TCEQ Core Data Form
Attachment C: Marked Version
Attachment D: Unmarked Version
Attachment E: Landowners' List and Map

Cc: Juan Zamora, City of Uvalde
LeeAnn Ortiz, City of Uvalde
Carl Mirelez, City of Uvalde
TCEQ Region 13

ATTACHMENT A

PERMIT/REGISTRATION MODIFICATION APPLICATION FORM AND E-PAY RECEIPT



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 Uvalde Landfill

Permittee or Registrant Name: City of Uvalde

MSW Authorization Number: 1725

Initial Submission Date: April 2026

Revision Date: _____

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
<input checked="" type="radio"/> Initial Submission <input type="radio"/> Notice of Deficiency (NOD) Response
2. Authorization Type
<input checked="" type="radio"/> Permit <input type="radio"/> Registration
3. Application Type
<input checked="" type="radio"/> Modification with Public Notice <input type="radio"/> Modification without Public Notice
<input type="radio"/> Temporary Authorization (TA) <input type="radio"/> Modification for Name Change or Transfer
4. Application Fee
Amount
The application fee for a modification or temporary authorization is \$150.
Payment Method
<input checked="" type="radio"/> Online through ePay portal www3.tceq.texas.gov/epay/
If paid online, enter ePay Trace Number: <u>582EA000727166</u>
<input type="radio"/> Check

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: Jennifer Brown

Title: Project Manager

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 Uvalde

Contact Name: Juan Zamora Title: Director of Public Works

MSW Authorization Number (if existing): 1725

Regulated Entity Reference Number: **RN** 102803921

Physical or Street Address: 3774 FM 481

City: Uvalde County: Uvalde State: TX Zip Code: 78801

Phone Number: (830) 278-3315

Latitude (Decimal Degrees): 29.1722

Longitude (Decimal Degrees): -99.8598

9. Facility Types

Type I Type IV Type V

Type IAE Type IVAE

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:

This permit modification request has been prepared in accordance with Texas Administrative Code (TAC) §305.70(k)(1) related to the use of an alternate daily cover (ADC) material on a permanent basis in accordance with §330.165(d). See transmittal letter for specifics of the proposed permit modification.

11. Facility Contact Information

Site Operator (Permittee or Registrant)

Name: City of Uvalde

Customer Reference Number: **CN** 600648455

Contact Name: Juan Zamora Title: Director of Public Works

Mailing Address: P.O. Box 799

City: Uvalde County: Uvalde State: TX Zip Code: 78802

Phone Number: (830) 278-3315

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: SCS Engineers

Consultant Name: Jennifer Brown

Texas Board of Professional Engineers Firm Registration Number: F-3407

Contact Name: Jennifer Brown Title: Project Manager

Mailing Address: 1901 Central Dr, Ste 550

City: Bedford County: Tarrant State: TX Zip Code: 76021

Phone Number: (817) 358-6130

Email 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

Facility Owner or Authorized Operator Signature

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: Juan Zamora Title: Director of Public Works

Email Address: [REDACTED]

Signature: [Handwritten Signature] Date: 4-6-26

Owner Authorization for Operator to Submit Application

To be completed by the facility owner if the application is signed by authorized operator.

I hereby authorize _____ 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.

Facility Owner Name: _____

Email Address: _____

Signature: _____ Date: _____

Notary

SUBSCRIBED AND SWORN to before me by the said Juan Zamora

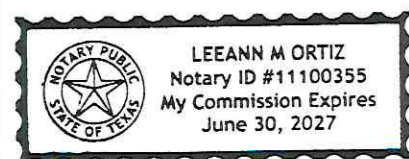
On this 6th day of April, 2026

My commission expires on the 30th day of June, 2027

[Handwritten Signature]

Notary Public in and for

Wvalde County, Texas



Note: Application Must Bear Signature and Seal of Notary Public

Attachments to Application for Municipal Solid Waste Modification or Temporary Authorization

Table 1. Attachments Required for All Modifications and Temporary Authorizations

Attachment	Attachment Number
TCEQ Core Data Form(s)	B
Fee Payment Receipt	A
Confidential Documents (if applicable)	N/A
Marked (redline/strikeout) Pages	C
Unmarked Revised Pages	D

Table 2. Additional Attachments for Modifications Requiring Public Notice

Attachment	Attachment Number
Land Ownership Map	E
Landowners List	E

Table 3. Additional Attachments for Permit or Registration Name Change or Transfer Modification

Attachment	Attachment Number
Land Ownership Map	_____
Landowners List	_____
Property Legal Description.....	_____
Property Metes and Bounds Description	_____
Metes and Bounds Drawings	_____
Final Plat Record of Property (if applicable)	_____
On-Site Easements Drawing	_____
Property Owner Affidavit	_____
Verification of Legal Status	_____
Evidence of Competency	_____



Your transaction is complete. Thank you for using TCEQ ePay.

Note: It may take up to 3 working days for this electronic payment to be processed and be reflected in the TCEQ ePay system. Print this receipt and the vouchers for your records. An email receipt has also been sent.

Transaction Information

Trace Number: 582EA000727166
Date: 04/01/2026 05:34 PM
Payment Method: CC - Authorization 000007797Z
ePay Actor: KRYSTAL L KUNTZ

IP: 99.48.161.145

TCEQ Amount: \$150.00

Texas.gov Fee: \$3.63

Texas.gov Price: \$153.63*

* This service is provided by Texas.gov, the official website of Texas. The price of this service includes funds that support the ongoing operations and enhancements of Texas.gov, which is provided by a third party in partnership with the State.

Payment Contact Information

Name: RYAN KUNTZ
Company: SCS ENGINEERS
Address: 1901 CENTRAL DR SUITE 550, BEDFORD, TX 76021
Phone: 817-358-6117

Cart Items

Click on the voucher number to see the voucher details.

Voucher	Fee Description	AR Number	Amount
824421	NONHAZARDOUS WASTE PERMIT - MODIFICATIONS		\$100.00
824422	30 TAC 305.53B HWP NOTIFICATION FEE		\$50.00
TCEQ Amount:			\$150.00

[ePay Again](#)

[Exit ePay](#)

Note: It may take up to 3 working days for this electronic payment to be processed and be reflected in the TCEQ ePay system. Print this receipt for your records.

ATTACHMENT B
TCEQ CORE DATA FORM



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input checked="" type="checkbox"/> Other Notice Permit Modification	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 600648455		RN 102803921

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)	
<input type="checkbox"/> New Customer		<input checked="" type="checkbox"/> Update to Customer Information	
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)		<input type="checkbox"/> Change in Regulated Entity Ownership	
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>			
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)		<i>If new Customer, enter previous Customer below:</i>	
City of Uvalde			
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits) 17460024189	9. Federal Tax ID (9 digits) 74-6002418	10. DUNS Number (if applicable) 096396320
11. Type of Customer:	<input type="checkbox"/> Corporation	<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited
Government: <input checked="" type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other	<input type="checkbox"/> Sole Proprietorship		<input type="checkbox"/> Other:
12. Number of Employees <input checked="" type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher		13. Independently Owned and Operated? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following			
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other:			
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant			
15. Mailing Address:	P.O. Box 799		
	City	Uvalde	State TX ZIP 78802 ZIP + 4 0799
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	
		[REDACTED]	

18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)
(830) 278-3315	200	() -

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected, a new permit application is also required.)								
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information								
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>								
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)								
City of Uvalde Landfill								
23. Street Address of the Regulated Entity: (No PO Boxes)	3774 FM 481							
	City	Uvalde	State	TX	ZIP	78801	ZIP + 4	
24. County	Uvalde							

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:									
26. Nearest City							State	Nearest ZIP Code	
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>									
27. Latitude (N) In Decimal:		29.1722			28. Longitude (W) In Decimal:		-99.8598		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds				
29	10	19.92	99	51	35.28				
29. Primary SIC Code	30. Secondary SIC Code		31. Primary NAICS Code		32. Secondary NAICS Code				
(4 digits)	(4 digits)		(5 or 6 digits)		(5 or 6 digits)				
4953			562212						
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)									
Municipal Solid Waste Landfill									
34. Mailing Address:	P.O. Box 799								
	City	Uvalde	State	TX	ZIP	78802	ZIP + 4	0799	
35. E-Mail Address:	[REDACTED]								
36. Telephone Number	37. Extension or Code			38. Fax Number (if applicable)					
(830) 278-3315	200			() -					

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.


<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input type="checkbox"/> Industrial Hazardous Waste
<input checked="" type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
1725				
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

SECTION IV: Preparer Information

40. Name:	Jennifer Brown, P.E.	41. Title:	Project Manager
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
(817) 358-6130		() -	

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	City of Uvalde	Job Title:	Director of Public Works
Name (In Print):	Juan Zamora	Phone:	(830) 278- 3315
Signature:		Date:	4-6-26

ATTACHMENT C
MARKED VERSION

TABLE OF CONTENTS (Contd.)

C. SITE OPERATING PLAN

Site Operating Plan C-1 to C-9

ATTACHMENTS

- 1) Groundwater Sampling Analysis Plan
- 2) Alternate Daily Cover Operating Plan

D. CERTIFICATIONS OF COMPLIANCE WITH LOCAL RESTRICTIONS

ATTACHMENTS

- 1) Airport Location Restriction
- 2) Floodplain Location Restriction
- 3) Wetland Location Restriction
- 4) Faulting Location Restriction
- 5) Seismic Impact Zones Location Restriction
- 6) Slope Stability Analysis

E. CERTIFICATION OF GROUNDWATER MONITORING SYSTEM

F. DRAWING SET

ATTACHMENTS

- 1) Airport Location Restrictions
- 2) FIRM Map Excerpts
- 3) Location Drawing - Wetlands (not applicable)
- 4) Location Drawing - Fault Areas (not applicable)
- 5) Preliminary Map of Horizontal Acceleration
- 6) Closure Section, Uvalde Landfill



Jennifer R. Brown 04/02/26
Attachment 2 Only

SCS Engineers
TBPE Reg. #F-3407

3. Alternative Material Daily Cover. Tarp [and/or commercial spray-on product \(see Attachment 2\)](#) will be used as temporary alternative daily cover (ADC) in accordance permit. Use of ADC is limited to a 24-hour period.

4. Final Cover. UMSWLF will install final cover for the landfill in accordance with the site closure plan and Subchapter K of 30 TAC Chapter 330 (relating to Closure and Post-Closure).

5. Erosion of Cover. Erosion of final or intermediate cover will be repaired within five days of detection by restoring the cover material, grading, compacting, and seeding unless the TCEQ approves otherwise, based on the extent of the damage, and weather conditions. The periodic inspections and restorations are required during the entire operational life and for the post-closure maintenance period.

6. Cover Inspection Record. The facility will keep a cover application record on site readily available for inspection by TCEQ. This record will specify the date cover (no exposed waste) was accomplished, how it was accomplished, and the last area covered. This applies to daily and intermediate daily cover. For final cover, this record will specify the area covered, the date cover was applied, and cover thickness. Each entry will be certified by the signature of the on-site supervisor that the work was accomplished as stated in the record.

§330.167 Ponded Water

The ponding of water over waste on a landfill, regardless of its origin, will be prevented. Ponded water that occurs in the active portion of a landfill or on a closed landfill will be eliminated and the area in which the ponding occurred will be filled in and regraded within seven (7) days of the occurrence.

In accordance with 30 TAC §330.207, the UMSWLF confirms that it will not discharge contaminated water without specific written authorization from the TCEQ.

All water coming into contact with waste or contaminated soils will be contaminated and managed as leachate, but may not require the same level of treatment as leachate.

§330.169 Waste in Enclosed Containers or Enclosed Vehicles Accepted at Type IV Landfills

This section is not applicable for the UMSWLF.

§330.171 Disposal of Special Wastes (See TCEQ RG-029)

The acceptance and/or disposal of a special waste as defined in 30 TAC §330.3 (relating to Definitions), which are specifically listed below will not be accepted at UMSWLF.

ATTACHMENT D
UNMARKED VERSION

TABLE OF CONTENTS (Contd.)

C. SITE OPERATING PLAN

Site Operating Plan C-1 to C-9

ATTACHMENTS

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ATTACHMENTS

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- 5) Seismic Impact Zones Location Restriction
- 6) Slope Stability Analysis

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- 3) Location Drawing - Wetlands (not applicable)
- 4) Location Drawing - Fault Areas (not applicable)
- 5) Preliminary Map of Horizontal Acceleration
- 6) Closure Section, Uvalde Landfill



Attachment 2 Only
SCS Engineers
TBPE Reg. #F-3407

**CITY OF UVALDE LANDFILL
UVALDE COUNTY, TEXAS
TCEQ MSW PERMIT NO. 1725**

SITE OPERATING PLAN

Prepared for:

City of Uvalde



Prepared by:

SCS ENGINEERS
Dallas/Fort Worth Office
1901 Central Drive, Suite 550
Bedford, Texas 76021
817/571-2288

Revision 5 – April 2026

SCS Project No. 16226047.00



Cover Page Only

SCS Engineers
TBPE Reg. #F-3407



**SITE OPERATING PLAN
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Attachments

- 1 Groundwater Sampling and Analysis Plan
- 2 Alternate Daily Cover Operating Plan

3. Alternative Material Daily Cover. Tarp and/or commercial spray-on product (see Attachment 2) will be used as temporary alternative daily cover (ADC) in accordance permit. Use of ADC is limited to a 24-hour period.

4. Final Cover. UMSWLF will install final cover for the landfill in accordance with the site closure plan and Subchapter K of 30 TAC Chapter 330 (relating to Closure and Post-Closure).

5. Erosion of Cover. Erosion of final or intermediate cover will be repaired within five days of detection by restoring the cover material, grading, compacting, and seeding unless the TCEQ approves otherwise, based on the extent of the damage, and weather conditions. The periodic inspections and restorations are required during the entire operational life and for the post-closure maintenance period.

6. Cover Inspection Record. The facility will keep a cover application record on site readily available for inspection by TCEQ. This record will specify the date cover (no exposed waste) was accomplished, how it was accomplished, and the last area covered. This applies to daily and intermediate daily cover. For final cover, this record will specify the area covered, the date cover was applied, and cover thickness. Each entry will be certified by the signature of the on-site supervisor that the work was accomplished as stated in the record.

§330.167 Ponded Water

The ponding of water over waste on a landfill, regardless of its origin, will be prevented. Ponded water that occurs in the active portion of a landfill or on a closed landfill will be eliminated and the area in which the ponding occurred will be filled in and regraded within seven (7) days of the occurrence.

In accordance with 30 TAC §330.207, the UMSWLF confirms that it will not discharge contaminated water without specific written authorization from the TCEQ.

All water coming into contact with waste or contaminated soils will be contaminated and managed as leachate, but may not require the same level of treatment as leachate.

§330.169 Waste in Enclosed Containers or Enclosed Vehicles Accepted at Type IV Landfills

This section is not applicable for the UMSWLF.

§330.171 Disposal of Special Wastes (See TCEQ RG-029)

The acceptance and/or disposal of a special waste as defined in 30 TAC §330.3 (relating to Definitions), which are specifically listed below will not be accepted at UMSWLF.

Attachment 2

Alternate Daily Cover Operating Plan

City of Uvalde Landfill

City of Uvalde
P.O. Box 799
Uvalde, Texas 78802
830-278-3315



SCS Engineers
TBPE Reg. #F-3407

SCS ENGINEERS

16226047.00 | April 2026

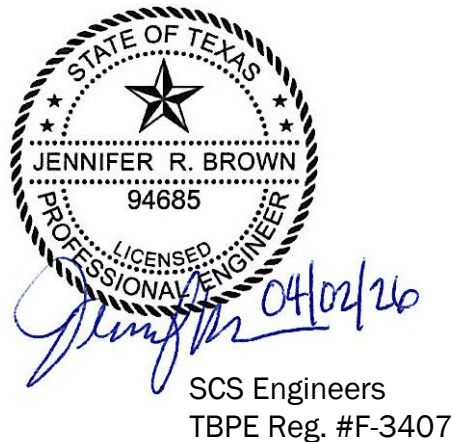
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Bedford, TX 76021
817-571-2288

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- Appendix A Tarps
- Appendix B VERDac Landfill Cover Pellets



1 INTRODUCTION

This Alternate Daily Cover Operating Plan (ADCOP) has been prepared for the City of Uvalde Landfill (landfill) consistent with 30 TAC §330.165(d)(1). The purpose of the ADCOP is to address the following issues:

- Description and thickness of ADC material.
- Effect of the ADC on vectors, fires, odors, and windblown litter.
- Chemical composition of the material and the Safety Data Sheet (SDS) for the ADC (if applicable).
- Other pertinent characteristics, features, or other factors related to the use of ADC.
- Operation methods to be utilized at the site when using the ADC.

ADC may be used to cover exposed waste as an alternative to soil cover, provided that certain operational techniques are used as specified in this ADCOP.

2 MATERIAL CHARACTERISTICS

2.1 DESCRIPTION OF ADC MATERIALS: §330.165(D)(1)(A)

The following types of ADC materials may be used at the landfill:

- Tarps – This category of alternative daily cover includes geotextile tarps. This material is deployed in various sized panels. Typical panels are approximately 50 feet by 50 feet in size. The material is pulled over the working face on approved lined cells by a dozer or similar equipment at the close of business and removed the following morning prior to waste placement. Tarps were approved for use as ADC in a letter to the City of Uvalde dated February 4, 1994 (see Appendix A).
- Spray-On ADCs are applied at the working face using mobile applicators. Ingredients of these ADCs vary according to the manufacturer, but include recycled paper and wood, as well as proprietary ingredients. One type of spray-on ADC is as follows:
 - VERDac Landfill Cover Pellets (VERDac), is a spray-on mulch and mineral mortar slurry comprised of water and a proprietary combination of cellulose fiber, powdered clay, adhesives, and water conditioners. VERDac is not a removable cover, and tracks in when additional waste is placed on top of the ADC. Additional information related to VERDac is provided in Appendix B.

The application method is by use of a hydroseeding unit or similar application method, and will be applied in accordance with the manufacturer's recommendations, with an approximate thickness of 1/8 inch. In accordance with the manufacturer's application guidelines, the ADC will be functional even if some waste is visible after application.

2.2 EFFECT ON VECTORS, FIRES, ODORS AND WINDBLOWN LITTER: §330.165(D)(1)(B)

The ADC visually conceals waste to not attract vectors and discourages insects and birds from landing and rodents from digging. Independent laboratory testing of VERDac Pellets by ASTM D-4982 method has certified that VERDac Pellets is non-fuel contributing, non-smoke producing, and non-combustible; therefore, is effective for fire control. A barrier is formed by the ADC that limits the transfer of atmospheric oxygen to the working face, thereby limiting odors. High adhesion and slurry density allow VERDac to form a shell that efficiently controls blowing litter.

2.3 CHEMICAL COMPOSITION CHARACTERISTICS: §330.165(D)(1)(D)

An SDS for VERDac Landfill Cover Pellets is provided in Appendix B. However, this SDS is subject to change based on manufacturer's revisions.

2.4 OTHER PERTINENT CHARACTERISTICS, FEATURES, OR OTHER FACTORS RELATED TO THE USE OF ADC: §330.165(D)(1)(E)

VERDac breaks up easily in the working face and does not form a barrier to landfill gas movement. VERDac is primarily used for overnight waste cover but can also provide dust control on soil surfaces. While VERDac sheds some water, alternative ADC or soil cover should be used if large amounts of surface water infiltration into the waste mass is a concern.

3 OPERATIONAL METHODS: §330.165(D)(1)(C)

The following subsections discuss the operational procedures that will be used to employ the proposed ADC materials. Landfill personnel will verify that the waste fill area has been covered with the appropriate ADC type and/or minimum required ADC thickness at the completion of each working day that ADC is applied.

3.1 TARPS

Tarps will be deployed as follows:

- Panels of ADC material will be pulled over the working face.
- The perimeter of the tarps will be anchored approximately every 20 feet with tires, sandbags, or other suitable material.
- The tarps will be removed the following morning and stored in an inactive area.
- This ADC will not be used if the landfill will be closed for more than 24 hours.

Based on experience at numerous landfills in Texas and other states, this type of ADC has been shown to be effective in controlling vectors, fires, odors, and windblown litter and waste.

3.2 SPRAY-ON ADC

VERDac is applied with equipment (e.g., hydroseeder) that sprays a layer of sufficient thickness to cover the working face. The following procedure will be used when applying the ADC:

1. The operator will become familiar with the SDS for the product to be used before operating the ADC application machine.
2. The operator will not operate the ADC application machine until they have been trained by qualified personnel.
3. The operator will mix the spray ADC according to manufacturer's recommendations.

VERDac will only be applied when wind speeds are below 45 miles per hour or per manufacturer's recommendations, whichever is lower. If the product becomes windblown either during or after the application, the use of the product should be discontinued until the wind speed decreases sufficiently to again allow use of the ADC. VERDac can also be applied during light rain events, freezing temperatures, or snow events.

As previously described, VERDac will not be removed from the working face at the beginning of the day following application, and will be tracked in when additional waste is placed on top of the ADC during the subsequent day of operation. VERDac will not be used if the landfill will be closed for a period greater than 24 hours, or if waste or soil daily cover will not be placed in the area of ADC application within 24 hours.

4 ADC VERIFICATION AND INSPECTION PROCEDURES

At the end of each working day, landfill personnel will inspect the working face to verify that the appropriate ADC type and/or minimum thickness of an approved ADC has been placed over the exposed waste in accordance with this ADCOP. Landfill personnel will routinely assess the effectiveness of the ADC in controlling vectors, fires, odors, and windblown waste based on field observations of material performance.

Appendix A

TARPS

MSW-1725

John Hall, Chairman
Pam Reed, Commissioner
Peggy Garner, Commissioner
Anthony Grigsby, Executive Director



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

FEB 4 1994

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TWO
CENTRAL RECORDS

Honorable William M. McWhorter
Mayor of Uvalde
P.O. Box 799
Uvalde, TX 78801

Re: Municipal Solid Waste - Uvalde County
City of Uvalde - Permit No. MSW-1725
3.5 Miles SW of Uvalde

Dear Mayor McWhorter:

This is in response to a letter, dated January 25, 1994, from Mr. Bill Lewis, City Manager, concerning the use of an alternate daily cover material (ADC) at the referenced landfill. Mr. Lewis requested that the facility be allowed to use the ADC on a permanent basis as authorized by 30 Texas Administrative Code (TAC) Section (§) 330.133(c).

Our review of this matter reveals that geotextile tarpaulins have been used as an ADC at the site in a test program approved by this office on June 28, 1993. The status reports regarding the test indicate that the ADC has performed well and has been an acceptable substitute for the regular soil cover. The request to use tarpaulins as an ADC for Permit No. MSW-1725 is approved in accordance with 30 TAC §305.70(c)(1) and 30 TAC §330.133(c).

If you have any questions concerning this letter or if we may be of any assistance to you regarding municipal solid waste, you may contact Mr. Jerry L. Garnett, P.E., of my staff here in Austin at P.O. Box 13087, Austin, Texas 78711; telephone number (512) 239-6673 or you may prefer to contact Mr. Richard Garcia, Regional Office Manager, at 140 Heimer Road, Suite 360, San Antonio, Texas 78232-5042; telephone number (512) 490-3096. When responding, please forward a copy of all correspondence to the regional office as well as to our central office.

Sincerely,

FOR Mary B. Adrian, P.E., Manager
Permits Section
Municipal Solid Waste Division

MBA/JLG/jad

cc: TNRCC Region 13
Uvalde City Manager

Appendix B
VERDac LANDFILL COVER PELLETS



VERDac

LANDFILL COVER PELLETS



A revolutionary low cost pelletized daily cover.

VERDac is an economical spray applied cover that reduces equipment costs, liberates manpower, significantly shortens your daily cover operation, and returns valuable airspace formerly consumed by bulky soil cover.



- **Extend landfill life**
- **Shorten cover time**
- **Reduce equipment cost**
- **Reallocate manpower**



Shorter pallet height – easy to transport, ability to load full 1 ton pallet on top of hydroseeder without unpacking.



1 Ton Pallet of VERDac Pellets

1 Ton Pallet of Standard Hydromulch



Contact us today for more information.



VACP0720

VERDac

LANDFILL COVER PELLETS

Save time while you're saving airspace.

Loading and mixing is accomplished in less than half the time required for other standard mulch products. Can be used in any type or size hydroseeding unit, including jet agitated.

Features:

- Pelletized mulch combined with Posi-Shell® technology
- Meets all daily cover requirements
- Adheres to landfill surfaces
- Ideal for recycling waste latex paint
- Load and mix in less than half the time
- No dust
- Packaged in 50 lb (22.7 kg) bags, 40 bags per pallet
- VERDac pallets are half the size of traditional bale pallets
- May also be used for hydroseeding

For technical services or to locate your nearest VERDac dealer:



Call: **1-800-800-7671** • Email: [REDACTED]
Visit LSC online at: **www.LSCenv.com**

LSC Environmental Products, LLC

2183 Pennsylvania Ave., Apalachin, NY 13732

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Solutions for the Greener Good



ENVIRONMENTAL
PRODUCTS, LLC™

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Apalachin, NY 13732
Ph: 800-800-7671
Fx: 607-625-2689
www.lscenv.com



USAGE GUIDE



August 2020

For other LSC Products, Application Equipment, or parts call us at 1-800-800-7671

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This guide gives you specific, easy to follow instructions for the safe and efficient usage of LSC Environmental Products VERDac Landfill Cover Pellets product. For best results and to ensure safety, please follow the instructions carefully.

1.0 Definition of VERDac Landfill Cover Pellets

VERDac Landfill Cover Pellets is a spray-applied mulch and mineral mortar slurry comprised of water and a proprietary combination of cellulose fiber, powdered clay, adhesives, and water conditioners, used for waste cover and hydroseeding. It is a low-cost alternative to the conventional six inches (150 mm) of soil used as daily cover at most landfills. VERDac Pellets is a non-flammable blend of mulch and mineral binder providing a thin, non-toxic coating that performs all functions of landfill daily cover. Applied with a standard hydroseeding unit, this product provides increased landfill capacity while providing a more environmentally effective cover system for the landfill.

1.1 Background and Concept

Landfilled solid waste must be covered each day to control vectors, fires, odors, blowing litter, and scavenging. Cover material is generally defined as a six inch (150 mm) soil layer or other suitable material. VERDac Pellets is designed for use by a landfill operator at the close of each operating day for compliance with cover regulations.

For most situations VERDac Pellets provides cover ranging from 10 ft² to 15 ft² per gallon (0.93 to 1.4 m²/liter) of slurry but depending on conditions and desired quality coverage up to 30ft² per gallon (2.8 m²/L.) can be achieved. The coverage area is dependent upon the desired thickness and the texture of the covered surface. Application of VERDac Pellets is a one-man operation.

1.2 Environmental and Economic Benefits

Use of VERDac Pellets conserves energy, natural resources and improves air quality by eliminating the use of heavy earthmoving equipment for the transporting, laying, and reworking of some soil covers on the landfill.

The major benefit of the use of VERDac Pellets is the conservation of extremely valuable landfill capacity, commonly known as “air space”. Landfill air space is a valuable asset and the need to conserve capacity is paramount to achieve environmental and economic objectives for both landfill operators and regulatory agencies. Efficient use of air space today can directly translate into longer landfill life, decreased operating costs, and increased revenue generation. An increase in air space efficiency up to 20% delays the need for the siting and construction of new facilities that ultimately may have severe environmental and economic impacts.

1.3 Equipment

The equipment used for VERDac Pellets consists of a standard hydroseeding unit, a towing unit, and a water source. The towing unit is used for moving the hydroseeding unit around the landfill site. If a nearby hydrant or other water source is not available, then a water trailer or truck is required.

1.4 Personnel

One operator is required for VERDac Pellets. This operator must be capable of operating heavy equipment and be familiar with the mechanics of all equipment used. The operator may be trained by LSC Environmental Products in the use of VERDac Pellets. If preferred, a two man operation may be used to expedite coverage time.

1.5 Materials

1.5.1 Water

Potable water, non-potable water and landfill leachate can be used as the liquid portion of VERDac Pellets. Use of leachate requires site-specific regulatory approval, operations, and safety plan to assure proper health and safety practices are implemented. In most VERDac Pellet mixtures approximately 1000 gallons (3785 liters) of water is used for each load of VERDac Pellets.

Each 50 lb (22.7 kg) bag of VERDac Pellets typically mixes with approximately 80 gallons (303 liters) of water. The water can either be supplied by a hydrant, pumped from a nearby pond, or brought to and stored adjacent to the hydroseeding unit by water truck or trailer. The sizing of the specific water supply method should be adequate to ensure that the filling of the hydroseeding unit occurs within a few minutes time.

As stated, leachate can be used as a water source if specific regulatory approval is obtained. It is not recommended that a high-strength leachate be used due to odor concerns and the added safety precautions required to assure worker safety. However, use of relatively dilute leachate is an effective method for reducing a portion of a landfill's total leachate production. The inherent odor-neutralizing properties of VERDac Pellets can mitigate the potential odor problems of leachate when it is used as a water source.

1.5.2 VERDac Landfill Cover Pellets

A proprietary blend of finely ground mulch, mineral binders and coloring mixed with water creates the VERDac Pellets Landfill Cover. See the back of this manual for a GHS Safety Data Sheet for this material.

1.5.3 Xtreme Rain Shield

During light rains, VERDac Pellets coatings will not typically wash off. However, if heavy rains are expected prior to the product fully drying (12-24 hours) the addition of Xtreme Rain Shield may help to prevent washing.

2.0 Safety

VERDac Pellets is nonhazardous and is composed of nonhazardous materials. Certain safety measures are recommended during different aspects of VERDac Pellets use. **Follow safety procedures specific to your hydroseeding unit, towing unit, or other equipment used.**

3.0 Operator Attire

The operator should wear appropriate protective clothing as specific by site management. Recommended protective clothing may include the following:

- Safety glasses
- Work gloves
- Approved work clothing
- Reinforced-Toe work shoes or boots
- P95 Dust mask while emptying bags into mixing unit

If leachate is being used as the liquid portion of the VERDac Pellets mixture, protective clothing in accordance with site regulations should be worn.

4.0 Towing Units

See table on Page 11 for VERDac Pellets material weights. To determine the total load weight, add the liquid weight, VERDac Pellets material weight and the weight of your hydroseeding unit. Ensure that the towing unit and hitch arrangement are capable of handling the total of these weights. *Note: 100 gallons/378.5 liters of water weighs approximately 836 lbs./379 kg.*

5.0 Loading and Mixing Procedure

It is important to add the VERDac Landfill Cover Pellets materials in the order specified.

5.1 Liquid Addition (Step 1)

Before placing any dry material in the mixing tank, the tank must be filled with the appropriate amount of liquid (water or leachate). Each 50 lb (22.7 kg) bag of VERDac Pellets typically mixes with 80 gallons (303 liters) of water. See chart on Page 11. If your hydroseeding unit has a reserve water tank, fill at this time with clean water. It is not recommended to use leachate as the clean out water.

All bags of material (VERDac Pellets Landfill Cover and Xtreme Rain Shield) can be loaded through the side rails of the hydroseeding unit onto the mixing deck from the ground. Ensure that they do not obstruct the ladder area. Never attempt to carry materials up or down ladders. To avoid back injuries, always use proper lifting practices when handling bags. Frozen materials should not be used.

5.2 VERDac Landfill Cover Pellets Addition (Step 2)

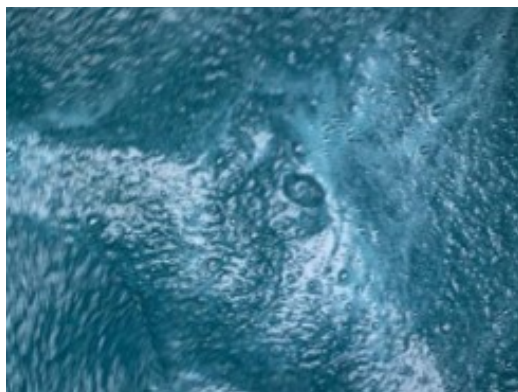
VERDac Pellets or Xtreme Rain Shield produces very little dust but a dust mask is recommended to prevent inhalation, and coveralls and gloves to prevent skin contact. Safety glasses should be worn to keep dust from entering the eyes. Should eyes or skin come in physical contact with any VERDac ingredients thoroughly rinse with water.

With mixer paddles running at medium speed add VERDac Pellets material by cutting open bag and dumping contents into the mixing tank (discard bag). See chart on Page 11 for quantities. Allow VERDac Pellets to mix at high speed for about 5 minutes until peaks and craters are visible on the surface of the product. Properly thickened VERDac Pellets will have a somewhat homogenous consistency. (see left photo below).



5.3 Optional Xtreme Rain Shield

During light rains, VERDac Pellets coatings will not typically wash off. However, if heavier rains are expected prior to the product fully drying (12-24 hours), the addition of up to 20% Xtreme Rain Shield may be necessary. Operator experience and discretion will determine which Xtreme Rain Shield formulation is best suited for the situation. With mixer paddles running at medium speed, add material to the already thickened VERDac Pellets by cutting open the bag and gradually adding the contents into the mixing tank (discard bag). For better dispersion of this product into the VERDac Pellets, recirculation through the pump and back to tank may be necessary. Properly thickened VERDac Pellets with Xtreme Rain Shield added will be more homogenous and a lighter green color than basic VERDac Pellets (see right photo below).



Properly Thickened VERDac Pellets

6.0 Transporting

Close inlet hopper lid prior to transportation and leave mixer paddles turning at low speed.

6.1 Cold Weather VERDac Pellets Transport

To prevent freezing during extremely cold weather (below 20°F -6°C), recirculate product through system back to mixing tank.

6.2 Towing on Slopes

To avoid the possibility of equipment tipping over, always tow up or back down slopes. DO NOT traverse (tow sideways) across slopes.



Proper orientation of equipment on slope

7.0 Application of VERDac Pellets

For overnight cover, conventional end-of-day waste compaction and surface preparation are normally adequate prior to VERDac Pellets application. A smoother surface will require less material due to reduced surface area.

Methods of application and the recommended finished appearance of VERDac Pellets are shown in the photographs on the next page. In general, the operator should position the application unit upwind, and should select the spray nozzle appropriate to the distance from the waste pile. When changing nozzles, be sure to disengage pump before disconnecting nozzle. In some cases, it will be necessary to spray a given area from two directions to compensate for “spray shadow” effects or wind dispersion. The most effective method of coverage will vary with each site, but generally, if opposite spray angles cannot be achieved due to operational constraints, the product is best applied from the location at which it will be observed most often.

When high winds are encountered, it may be necessary to position the hydroseeding unit in an upwind position. Since pumps emit a high pressure stream of slurry it is not generally effected by light winds; however, wind direction should always be considered with respect to airborne dispersion of overspray.

The application process is not typically affected by cold weather.



Daily Cover



Application of VERDac Pellets for hydroseeding

Application of VERDac Pellets via
Deck -Mounted Discharge Wand

7.1 Odor Control

VERDac Pellets formulation has an inherent capability to suppress odors. By applying the VERDac Pellets as a daily cover, typical landfill odors will be reduced.

Where excess or extreme odors warrant additional action, contact LSC for information about our Odor-Shell[®] product.

7.2 Vector Control

VERDac Pellets Landfill Cover has proven effective at inhibiting the attraction of vectors to waste piles.

7.3 Scavenging

General animal scavenging is reduced since the VERDac Pellets seals in odors and hides the visible food source beneath the covering shell. Scavenging by humans is inhibited by the complete visual coverage of the waste pile and by the coating of slurry applied upon all surface objects.

7.4 Litter Control

VERDac Pellets is highly effective for litter control. Due to the sticky consistency and weight of the material, a shell is formed over the garbage which prevents litter from being blown away by high winds. A thin layer of VERDac Pellets is recommended for preventing blowing litter.

In extremely windy situations, VERDac Pellets can be applied to waste as it is being unloaded from garbage trucks. This technique has been proven highly effective.

7.5 Fire Control

VERDac Pellets is an extremely effective fire control material. Independent laboratory testing of VERDac Pellets by ASTM D-4982 method has certified that VERDac Pellets is non-fuel contributing, non-smoke producing, and non-combustible. When an acetylene torch is applied directly to the VERDac Pellets cover, ignition of the VERDac Pellets cover or underlying waste does not occur.

7.6 Additional Applications

VERDac Pellets may also be used as a hydroseeding medium. Addition of EarthGuard® may be required for some landfill surfaces. Contact us for more details.



VERDac Landfill Cover Pellets Application Minimum Requirements Guideline

	<u>SHORT TERM COVER</u> (Depending on conditions cover can last overnight to several days)
SLURRY MIXTURE*	VERDac Landfill Cover Pellets (See next page for mixtures)
APPLICATION RATE	Approx. 10-15 ft ² /gal.** (0.93 - 1.4 m ² /L.)
COVERAGE METHOD	Apply from two directions to compensate for spray shadow.
COVERAGE THICKNESS	Finished cover should be Approx. 1/8" (3.5 mm)
COVERAGE APPEARANCE	Depending on surface conditions, some trash may be visible. Product still 100% functional.
COVERAGE MAINTENANCE	None. Waste is placed over cover next working day.

* These are manufacturer's recommendations. Use and practice will determine the best mixture for each situation.

** Depending on conditions and desired quality, up to 30 ft²/gal. (2.8 m²/L.) can be achieved.

VERDac Landfill Cover Pellets Formulations Guide

Materials	Base
Water or Leachate (Gallons)	1000
VERDac: 50 lb Bag	13
Xtreme Rain Shield (50 lb Bag)	1-2
Finished Product (Gallons)	1000

(~80 gallons per bag of VERDac Pellets)

(May be necessary for heavy rain)

Materials	Base
Water or Leachate (Liters)	3,785
VERDac 23 kg Bag	13
Xtreme Rain Shield (23 kg Bag)	1-2
Finished Product (Liters)	3,785

(~303 liters per bag of VERDac Pellets)

(May be necessary for heavy rain)

Some leachate, hard water, and salty water may require more VERDac Pellets to achieve proper thickness. These are manufacturer's recommendations. Use and practice will determine the best mixture for each situation.

7.7 Discharge Nozzle Selection

While other nozzles may be used, LSC Environmental Products offers numerous types of discharge nozzles for the effective spraying of VERDac Pellets at a variety of ranges. Experience and operator discretion will determine which nozzle to use in each situation.



Long Range (Solid Stream)
for Distances of 100—150 feet
(30—46 meters)



Medium/Long Range (15° Flat
Spray) for Distances of 75—100
feet (23—30 meters)



Medium Range (25° Flat Spray)
for Distances of 25—75 feet



Short Range (50° Flat Spray)
for Distances of 5—25 feet



High Efficiency (25° Low Flow Spray)
for Distances of 5—25 feet

7.8 Handling the Discharge Spray Boom

Care must be taken to use the proper discharge nozzle in order to attain the desired spray range, as being too close to the surface will cause the VERDac Pellets stream to overturn waste on contact. At long range distances the VERDac Pellets stream will break up, causing the desired spray effect. At ranges under 75 ft. (23 meters) the medium or short nozzle should be used and are designed to spray in a wide fan pattern.

Blockages may occur in nozzles due to foreign objects in the raw materials. Refer to Section 11.1 for procedure on removing foreign object from discharge nozzle.

With the desired nozzle securely in place, firmly grasp discharge spray handle in one hand and point discharge nozzle in desired direction of spray. With the other hand engage product pump and begin covering area. For desired spray effect operator may adjust pump or throttle speed.

Never disconnect nozzles when pump is running. Never engage pump with discharge spray boom unattended. Never put hands in front of discharge nozzles.

Do not spray at or near other persons. Spray exits nozzle at a high velocity and could cause injury.

Do not spray toward power lines, transformers or other high voltage conductors. Avoid spraying into wind. When unavoidable, be sure to keep direction of spray near to ground. Safety glasses should be worn during spraying operation.

7.9 Coverage of Large Area

Coverage of a large area will require moving the application unit to several spray locations. Inspect the area from several perspectives to ensure that the spray has covered all areas.

8.0 Cleaning

It is recommended that the hydroseeding unit be cleaned after use. VERDac Pellets may be used over several days and will not set up in the mixing tank. After the product is all used, the unit should be cleaned.

1. When tank is empty of product, shut off pumps, paddles, and engine.
2. Open all inlet lids.
3. With clean water, rinse product from inlets, lids, deck, walls, etc.
4. Fill tank to mixing shaft.
5. Close inlet lids.
6. Agitate mixing paddles at high speed for several minutes, splashing water inside of tank.
7. Drain in approved location.
8. Repeat steps 4—7 as necessary.

A properly cleaned hydroseeding unit will remain free of any built-up product internally and externally.



9.0 Winter Care

In extreme cold it is imperative that engines and hydraulic systems are thoroughly warmed before introducing a load. Refer to the operations manual for your hydroseeding unit for proper winter usage and care. During cold weather periods, the hydroseeding unit tank and pump must be drained at the end of the day to avoid freezing. It is desirable, but not necessary, to bring the machinery into a heated building for overnight storage.

9.1 Applicator Winterizing Procedure

1. After cleanout, drain the mixing tank thoroughly. **DO NOT REPLACE DRAIN CAP.**
2. If your hydroseeding unit is equipped with a reserve water tank and/or pump, drain thoroughly. **DO NOT REPLACE DRAIN CAPS.**
3. Pour approximately one half gallon (1.9 L) of anti-freeze into pump or tank and slowly run through pump and lines to prevent freezing.

10.0 Materials Storage

All materials are inert and can be stored on or off the boundaries of lined landfill cells.

10.1 VERDac Pellets Material Storage

VERDac Pellets should be kept dry. Stretch wrapped pallets can be easily covered with a tarp or plastic as a secondary measure of protection.

10.2 Xtreme Rain Shield

Xtreme Rain Shield should be kept dry. Stretch wrapped pallets can be easily covered with a tarp or plastic as a secondary measure of protection. .

11.0 Troubleshooting

11.1 Removing Foreign Object from Discharge Nozzle

1. Immediately turn off pump.
2. If unit is equipped with pump reverse feature, reversing for a few seconds releases any potential pressure in lines. With nozzle pointing away, remove nozzle and clear obstruction.
3. Reconnect nozzle and continue spraying.

11.2 Removing Foreign Object from Mixing Tank

1. Shut off mixer, pump, and engine.
2. If object can be safely retrieved with extended gaff tool, remove and continue with operation. If object cannot be found, drain load in approved area, locate object, and safely remove with extended gaff tool.

11.3 Clearing Clogged Mixing Tank

1. In the unlikely event that the VERDac Pellets slurry has thickened in the mixing tank to the point that the mixer paddles will not turn, disengage mixer. Do not force mixer.
2. A strong stream of water applied to the surface of the material should begin to thin the slurry. Gently rocking the mixer should free up material and allow to mix back to normal consistency.

11.4 Lockout/Tagout & Confined Space Entry

1. The authorized employee must adhere to their own company's procedure for "Lockout/Tagout". He or she must understand the hazards and know how to control them.
2. If the equipment is operating, shut it down by normal stopping procedure (turn key switch off, depress emergency stop button, close valves, etc.) and remove the positive battery cable so that the machine or equipment is isolated from the battery.
3. Install tags on the battery cable lug and at the ignition control box with Date, Time, & Authorized Repair Employee's Name.
4. If repairing such items as springs, flywheels, hydraulic systems, air, gas or water pressure, etc..., stored or residual energy may be present and must be dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down, etc.
5. Ensure that no other personnel are in the engine compartment or areas of isolation. Then verify the isolation of the equipment by operating the normal controls, testing to make certain the equipment will not operate.
6. Return all controls to "Neutral" or "OFF" after verifying the isolation of the equipment.
7. If entry into confined space is necessary, the authorized employee must adhere to their own company's procedure for "Confined Space Entry"

12.0 Contingency Soil Supply

In the event that you are unable to apply VERDac Pellets, the landfill operator should have a three-day supply of soil for daily cover material available on-site.



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1 Identification

Supplier LSC Environmental Products, LLC
2183 Pennsylvania Ave
Apalachin, NY 13732

Telephone: 607-625-3050
Fax: 607-625-2688
Web: www.lscenv.com

Product Name **VERDac Landfill Cover Pellets**
Description: Green Dyed Cellulose Fiber from Shredded Wastepaper and Corn Fiber and Sodium Montmorillonite Clay with Additives
CAS Number: N/A
Recommended Use: Alternative Daily Cover and Hydroseeding.

2 Hazards Identification

Route of Entry: Eye Contact, Skin Contact, Inhalation

Hazards: Eye: May cause mechanical irritation.
Skin: May cause mild skin irritation.
Ingestion: No known health effects.
Inhalation: Acute: Short term exposure may cause mechanical irritation resulting in dry cough. May aggravate existing respiratory illness.
Chronic: Repeated inhalation of respirable* crystalline silica above exposure limits can cause lung disease, including silicosis and lung cancer.

3 Composition / Information on Ingredients

Components in order of Volume:
Cellulose Fiber, Corn Fiber, Sodium Montmorillonite Clay* (Cas # 1318-93-0), Proprietary ingredients and biodegradable green coloring.

*Typical western SMC contains 1-6% crystalline silica as quartz CAS# 14808-60-7.

4 First-Aid Measures

Eye: Flush eyes and under eye lids with plenty of water until irritation ceases. Contact physician if irritation persists.

Skin: Wash with soap and water until clean. Contact physician if irritation develops.

Ingestion: None known.

Inhalation: Move to area free from dust. If symptoms of irritation persist, contact physician.



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Inhalation may aggravate existing respiratory illness.

5 Fire Fighting Measures

Flammability: Combustible product
Auto-ignition Temp: 400-500 F
Fire Extinguishing Media: Water, Carbon Dioxide, Sand.

6 Accidental Release Measures

Personal Precaution: Avoid breathing dust; wear respirator approved for silica bearing dust.
Cleanup: Vacuum to avoid generating airborne dust. Avoid using water. Material becomes slippery when wet.

7 Handling and Storage

Handling: Use NIOSH/MSHA respirators approved for silica bearing dust when airborne SMC dust levels exceed PEL/TLVs. Clean up spills promptly to avoid making dust. Storage area floors may become slippery if wetted.
Storage: Store in a dry place. Keep away from ignition sources.

8 Exposure Controls / Personal Protection

Exposure Guidelines (Inhalation):

Component	OSHA PEL (8 hr TWA)	ACGIH TVL
Crystalline Silica as Quartz	0.1 mg/m ³	0.1 mg/m ³
Wood Dust	1 mg/m ³	1 mg/m ³
Particles Not Otherwise Regulated		
Total Dust	15 mg/m ³	N/A
Respirable Dust	5 mg/m ³	N/A

Engineering Controls: None required for outdoor mixing and application. Use local ventilation to maintain PELs/TLVs if handling indoors.

Personal Protective Equipment:

Eye and Face Protection: Wear safety glasses or goggles during loading and application to protect from dust, splashing, and spray mist.

Skin Protection: Wear gloves and overalls to protect skin and clothing from contact with product. Personal hygiene measures, such as washing hands and face after working with materials, are recommended.



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Respiratory Protection:

When handling generates dust levels above exposure limits, use respirators approved by NIOSH/MSHA for silica bearing dust.

9 Physical and Chemical Properties

Appearance:	Green Pellets
Odor:	N/A
Physical State:	Granular Mixture of Cellulose Fiber, Corn Fiber, Sodium Montmorillonite Clay, Proprietary Ingredients, Dye
pH:	5.5-7.0
Specific Density:	20-35#s/ft ³ (approximate)
Specific Gravity:	N/A
Solubility in Water:	<2%
Vapor Pressure (mm Hg):	N/A

10 Stability and Reactivity

Stability:	Stable
Conditions to Avoid:	Avoid open flame. Store in dry areas.
Materials to Avoid:	N/A
Hazardous Polymerization:	No.

11 Toxicological Information

- Carcinogenicity:
- Sodium Montmorillonite Clay is not listed by ACGIH, IARC, NTP, or OSHA.
 - IARC, 1997, concludes that there is sufficient evidence in humans for the carcinogenicity of inhaled crystalline silica from occupational sources (IARC Class 1), that carcinogenicity was not detected in all industrial circumstances studied and that carcinogenicity may depend on characteristics of the crystalline silica or on external factors affecting its biological activity. NTP classifies respirable crystalline silica as "known to be a human carcinogen" (NTP 9th Report on Carcinogens - 2000). ACGIH classifies crystalline silica quartz as a suspected human carcinogen (A2).

12 Ecological Information

No information available.

13 Disposal Considerations

Bury in licensed landfill according to local, state, and federal regulations.



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14 Transportation Information

US DOT:

Non-regulated

15 Regulatory Information

None of the components in this product are known to be regulated by national or international regulatory bodies.

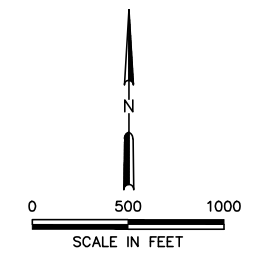
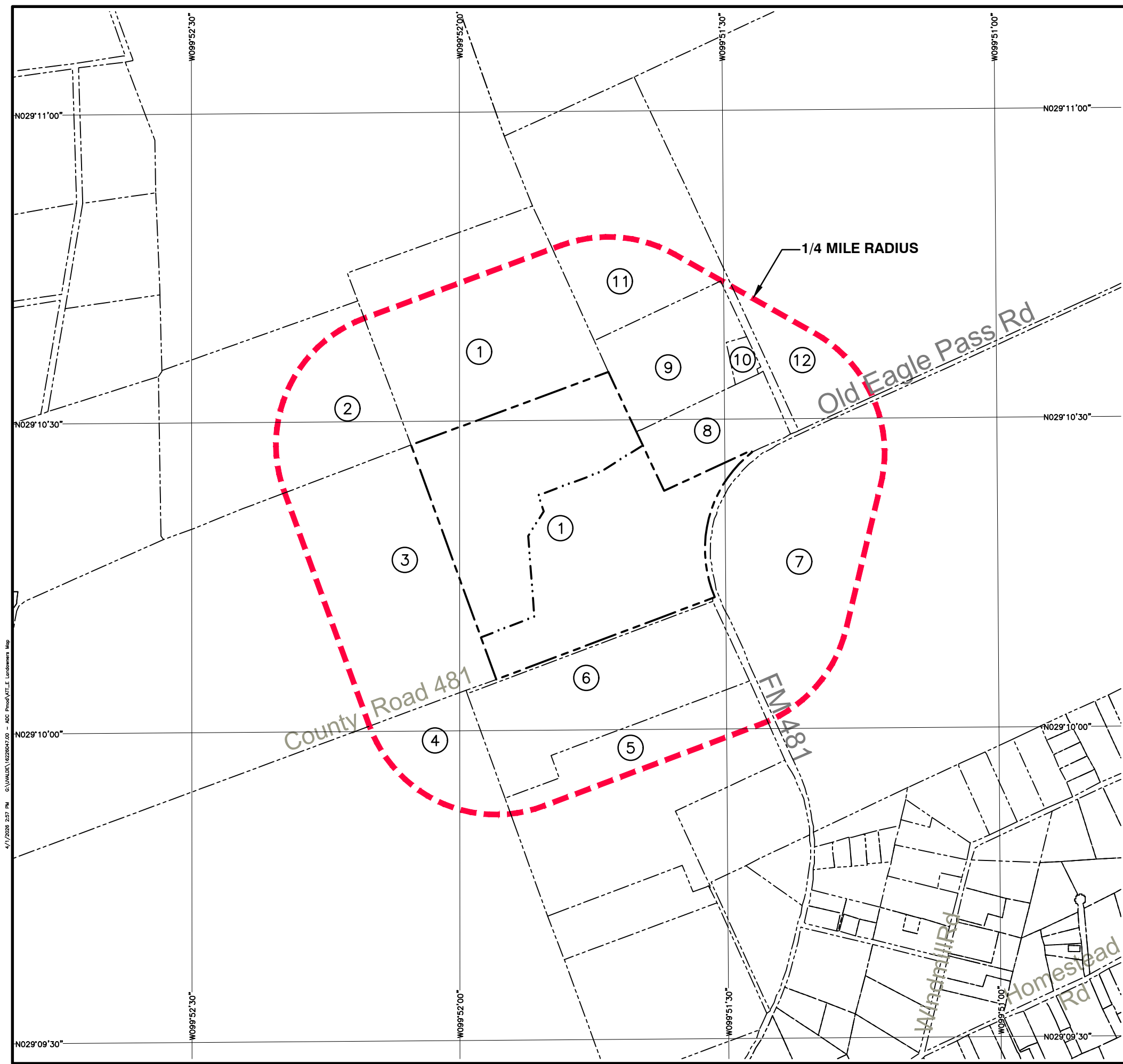
16 Other Information

SDS Status: Revised from MSDS format in 2015 to comply with GHS requirements.

All information presented herein is believed to be accurate; however, it is the user's responsibility to determine in advance of need that the information is current and suitable for their circumstances.

No warranty or guarantee, expressed or implied, is made by LSC Environmental Products, LLC as to this information or as to the safety, toxicity, or effect of the use of this product.

ATTACHMENT E
LANDOWNERS' LIST AND MAP



LEGEND

- PROPERTY BOUNDARY
- . - . - . PERMIT BOUNDARY
- ADJACENT PROPERTY BOUNDARY
- 1/4 MILE RADIUS
- 96°55'30"--- LATITUDE/LONGITUDE LINES

NOTES:

1. (X) CORRESPONDS TO LANDOWNERS LISTED ON LANDOWNERS LIST.
2. PROPERTY OWNERS WITHIN 1/4 MILE OF THE PERMIT BOUNDARY ARE SHOWN.
3. LANDOWNER PROPERTY BOUNDARIES INDICATED ARE APPROXIMATE.

LANDOWNERS' LIST

- | | |
|--|---|
| 1. CITY OF UVALDE
P.O. BOX 799
UVALDE, TEXAS 78802-0799
PROPERTY ID: 125012 | 7. FLYING W PROPERTIES LTD.
P.O. BOX 2109
SAN MARCOS, TEXAS 78667
PROPERTY ID: 18233 |
| 2. KESSLER HWY 90 RANCH LTD.
200 EAST NOPAL ST., SUITE 200
UVALDE, TEXAS 78801-5332
PROPERTY ID: 18069 | 8. MINYARD INVESTMENTS LP
1004 CEDAR PARK DRIVE
CEDAR PARK, TEXAS 78613
PROPERTY ID: 18294 |
| 3. EGBERT JIM GUY ET UX. HEATHER
430 S. SANTA ROSA
SAN ANTONIO, TEXAS 78207
PROPERTY ID: 18071 | 9. SORRELLS KENNETH D. JR.
ET UX. LISA W
102 OLD SAN ANTONIO ROAD
BOERNE, TEXAS 78006
PROPERTY ID: 117039 |
| 4. MIRASOL RANCH FAMILY LTD. PARTNERSHIP
C/O DULLNIG ROBERT AND JEAN
315 BURR ROAD
SAN ANTONIO, TEXAS 78209
PROPERTY ID: 20422 | 10. SORRELLS KENNETH D. JR.
102 OLD SAN ANTONIO ROAD
BOERNE, TEXAS 78006
PROPERTY ID: 18295 |
| 5. JUAN MARTINEZ, JR. AND MARIA DAVILA
1698 WINDMILL ROAD
UVALDE, TEXAS 78801
PROPERTY ID: 123452 | 11. FLYING W PROPERTIES LTD.
P.O. BOX 2109
SAN MARCOS, TEXAS 78667-2109
PROPERTY ID: 18293 |
| 6. ROBERT M. DULLNIG
315 BURR ROAD
SAN ANTONIO, TEXAS 78209
PROPERTY ID: 122946 | 12. FLYING W PROPERTIES LTD.
P.O. BOX 2109
SAN MARCOS, TEXAS 78667-2109
PROPERTY ID: 18292 |

SOURCE: UVALDE COUNTY APPRAISAL DISTRICT-UVALDE CAD PROPERTY SEARCH
LAST ACCESSED ON 03/27/2026. NO MINERAL INTEREST OWNERSHIP WAS
IDENTIFIED ON THE UVALDE COUNTY APPRAISAL DISTRICT FOR THE LAND WHERE
THE LANDFILL IS LOCATED.



Jennifer R. Brown
04/02/26

4/1/2026 2:57 PM C:\UVALDE\1628607\00 - ADC Prod\ATL_E Landowners Map

DRAWING TITLE	LANDOWNERS' LIST AND MAP
PROJECT TITLE	CITY OF UVALDE LANDFILL PERMIT MODIFICATION
CLIENT	CITY OF UVALDE 3774 FM 481 UVALDE, TEXAS 78801
CONTRACT NO.	S/A REV. ETC.
DRAWN BY: JRB	APP. BY: EDC
CHECKED BY: JRB	DATE: 04/2026
SCALE: AS SHOWN	ATTACHMENT: E
CADD FILE: ATL_E LANDOWNERS MAP	TXS BOARD OF PROFESSIONAL ENGINEERS REG. NO. F-3407