



Texas Commission on Environmental Quality

Waste Permits Division Correspondence

Cover Sheet

Date: 07/2025

Facility Name: Golden Triangle Landfill

Permit or Registration No.: 2027

Nature of Correspondence:

☐ Initial/New

☒ Response/Revision to TCEQ Tracking No.:
31544963 (from subject line of TCEQ letter
regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
<input type="checkbox"/> New Notice of Intent	<input type="checkbox"/> Alternative Daily Cover Report
<input type="checkbox"/> Notice of Intent Revision	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Compost Report
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input checked="" type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Groundwater Background Evaluation
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure	<input type="checkbox"/> Other:
<input type="checkbox"/> Other:	

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> CCR Registration	<input type="checkbox"/> Extension Request
<input type="checkbox"/> CCR Registration Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> CCR Registration Minor Amendment	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Waste Minimization Report
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> 335.6 Notification	
<input type="checkbox"/> Other:	



Sustainability in Action

July 10, 2025

Mr. Frank Zeng
Project Manager
Municipal Solid Waste Permits – MC 124
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

Re: NOD Response – Limited Scope Amendment
Golden Triangle Landfill – MSW Permit No. 2027
Jefferson County, Texas
TCEQ Tracking No. 31544963

Dear Mr. Zeng:

Listed below are each comment submitted by TCEQ (in bold) immediately followed by the responses.

1. **The kickoff meeting discussion included information on growing sources and quantities of Class 1 non-hazardous industrial waste in the Beaumont Region and the landfill service area. Revise the application to include discussions of these sources and growth rates of Class 1 non-hazardous industrial waste in the Beaumont Region and the landfill service area.**

Response:

Section 2.0 has been updated to include additional information regarding growth sources and rates of Class 1 non-hazardous industrial waste in the Beaumont region and landfill service area.

2. **The application specifically request processing this application per Title 30 TAC §305.62(j)(2)(C). Rule §305.62(j)(2)(C) requires a limited scope amendment for “addition of alternative liner design, in accordance with §330.335 of this title (relating to Alternative Liner Design)”. This rule citation does not apply to this application type. Please revise.**

Response:

The reference to §305.62(j)(2)(C) was inadvertently included in the original cover letter. Other references throughout the application consistently request that the application be processed per §305.62(j)(2), the intended rule reference.

3. **Page 2, Section 3.0, paragraph two, sentence three of the application states “therefore, the changes to the current SDP and SOP to increase the percentage of Class 1 Waste that can be accepted at the facility are minimal, as noted in Section 5.0 below.” Section 5.0 does not seem to contain the referenced information. Clarify the discrepancy and/or revise as appropriate.**

Response:

Section 3.0 has been revised to reference Section 6.0 and the table included in Attachment 1.

4. **Revise Figure 1 to fix the misalignment of lines.**

Response:

Figure 1 has been updated as requested.

5. **Revise the last paragraph of Section 4.0 to identify the design parameter as used in “this key design parameter.”**

Response:

Section 4.0 has been revised as requested.

6. **The cover page of the Site Operating Plan is missing the November 2018 revision date. Revise to include all revision dates on the cover page of the SOP.**

Response:

The SOP Cover Page has been updated to include the November 2018 Revision.

7. **The permit number listed on the title page for Special Waste Acceptance Plan, Appendix C, of the SOP is MSW No. 1149B. Revise to list the correct TCEQ Permit No. 2027**

Response:

The Appendix C title page has been updated to reflect Permit No. 2027.

8. **The application process to revise Section 4.20.7.9 of the existing SOP. Section 4.20.7.9 included in the application is different than the version on file. To facilitate our review, provide a copy (pdf) of the complete Section 4.20.7, which is the basis for the proposed revisions.**

Response:

A PDF copy of Section 4.20.7 of the SOP was provided to the TCEQ via email on June 16, 2025.

9. **Figure 1 shows two lines marked as “Typical % of Class 1 Waste strength parameters.” A third line is referred to as “Shear strength used for Golden Triangle Slope Stability Analysis.” Explain the meaning of “Typical %.” The ranges of the parameter values listed for the first two lines are significantly higher than those for the third line. The parameter values of the third line are the same as listed on Page J-4-3 in the existing SDP and used for Class 1 Waste in the existing slope analysis. Revise Section 4.0 of this application to discuss the validity and relevance of the parameter values listed for the first two lines. Explain why the proposed parameter values are much higher than those used in the existing stability analysis. Also revise other portions of the application as necessary.**

Response:

Section 4.0 has been updated to include additional information regarding the shown strength parameter values on Figure 1. Note that “Typical % of” has been removed from Figure 1 (it was inadvertently included). As discussed, the Golden Triangle design utilizes conservative values much lower than typical results seen in previous in-situ testing.

10. **Page J-4-3 in the slope analysis of the current SDP lists waste unit weights as well as shear strengths under both total and effective conditions. Consistent with the existing SDP conditions, revise the application to analyze slope stability considering shear strength under total and effective conditions, and waste unit weights.**

Response:

The slope stability analysis included in the existing SDP (Appendix J) was completed for the Class 1 areas, conservatively using strength parameters that represent the Class 1 waste disposal area. For example, the unit weight of the Class 1 waste was selected to be 100 pcf which is representative of Class 1 waste as noted on Page J-4-3. The cohesion (288 psf) and internal friction angle (23 degrees), used for both total and effective stress conditions, was conservatively selected as noted on Page J-4-3. A comparison of the selected shear strength parameters and the actual values obtained from Class 1 areas at various sites in Texas show that the selected shear strength parameters (cohesion and internal friction angle) are lower than the values from in-situ testing. The use of lower shear strength design parameters than the in-situ test values result in a conservative design (i.e., this approach will yield lower factors of safety than what would be obtained if the higher, actual shear strength parameters were used). Therefore, no additional analysis is needed.

- 11. Revise all relevant portions of the application to identify/describe the Class 1 waste streams and discuss how the parameter values used in stability analysis would be (conservatively) representative of all possible waste streams.**

Response:

Class 1 waste streams (and potential Class 1 waste streams) are identified and described in Table 6-1 of Appendix C (Special Waste Acceptance Plan) of the SOP. The types of Class 1 waste accepted at the site will remain consistent with past acceptance practices, just in larger quantities. The strength parameters used in the permitted stability analysis are representative of wastes currently accepted and wastes anticipated to be accepted in the future.

- 12. Appendix J states, "If the in-situ strength parameters are significantly lower than the design listed in the permit, an additional stability analysis will be completed to verify that the minimum required factor of safety values are met." Define "significantly lower" and describe the process to make this determination.**

Response:

The word significantly has been removed. Additional stability analysis will be completed if any strength parameter is lower than the permit design.

- 13. The application proposes a program to collect samples of in-situ, undisturbed wastes to analyze for their strength parameter values and compare them with the values used in the design. Revise Appendix J to include measures to be taken when the minimum required factor of safety values are not met based on the strength values obtained from the sampling and testing of the in-situ wastes. The measures should include actions rectifying the stability conditions of the in-place wastes as well as for the wastes that are yet to be deposited in the landfill.**

Response:

Section 1 of Appendix J has been revised to address this comment.

- 14. Considering that the application proposes to increase the Class 1 waste percentage from 20 percent to 90 percent, discuss potential impacts of differential settlement between Class 1 waste and MSW waste and any necessary countermeasures. Revise as necessary.**

Response:

The site segregates Class 1 waste and MSW waste disposal in separate sectors and that is expected to continue. Therefore, differential settlement of the liner system is not expected as the waste unit weights within each of the respective sectors (i.e.,

Class 1 or MSW) will be similar. As waste fill operations progress, it is expected that differential settlement between the two areas will be nominal and will equalize over time.

- 15. Discuss how waste acceptance will be tracked to ensure that the maximum percentage of Class 1 is not exceeded. Revise the application/SOP as appropriate.**

Response:

Section 4.20.7.9 has been updated as requested. Additionally, this section has also been revised to remove the containment dike requirement, as this was amended in 2017.

- 16. Rule §330.991(f) states, “An MSW landfill cell that contains Class 1 industrial nonhazardous waste greater than 20% by weight or volume must have a GCCS associated with the location of the Class 1 waste, and that GCCS is subject to the provisions of §330.995 of this title (relating to Recordkeeping and Reporting Requirements for all Municipal Solid Waste Landfill Sites).” Revise the application to include necessary information to demonstrate compliance with the requirements. Revise the existing SDP and SOP as necessary.**

Response:

The current version of Attachment 14 – Landfill Gas Management Plan accounts for GCCS installation throughout the entire site (refer to Attachment 9-4). This includes the segregated Class 1 waste disposal area. Additionally, the provisions listed in §330.995 are consistent with the site’s current Standard Air Permit.

- 17. Rule §330.985(d)(2)(D) requires a separate air permit under Chapter 106 or Chapter 116 for “a municipal solid waste landfill site that is permitted to accept 51% or more by weight or volume of Class 1 industrial nonhazardous waste.” Revise the application to discuss how Golden Triangle Landfill has satisfied or will satisfy this requirement. Revise the existing SDP and SOP to include necessary information to comply with this rule.**

Response:

Even with the increased percentage of Class 1 waste acceptance, the landfill will not exceed 51% of Class 1 waste by weight or volume. The total airspace volume of the landfill is 17,563,555 cubic yards. The total volume of Phase 1 is 11,945,078 cubic yards and Phase 2 is 5,618,477 cubic yards. The total estimated MSW volume in Phase 1 is 10,898,078 cubic yards and the total estimated Class 1 volume in Phase 1 is 1,047,000 cubic yards. The total estimated MSW to be placed in Phase 2 is 2,892,008 cubic yards and the total estimated Class 1 to be placed in Phase 2 is

2,726,469 cubic yards. Therefore, the total estimated MSW for the facility will be 13,790,086 cubic yards and the total estimated Class 1 for the facility will be 3,773,469 cubic yards. Based on this, the total estimated percentage of MSW is 78% and Class 1 is 22%.

- 18. Revise the existing closure/post-closure care plans and their cost estimates to accommodate the changes to be made per this application (for example, but not limited to, the additional landfill gas related installation, operation, monitoring, reporting, closure, etc.).**

Response:

In review of the existing C/PC costs there is already a plan to install a gas system within the Class 1 waste disposal area. However, we have updated the closure cost to include in-situ testing of the Class 1 waste disposal area, per Appendix J.

- 19. If necessary, revise Appendix C (Special Waste Acceptance Plan) of the existing SOP to accommodate the acceptance of any additional wastes proposed under this application.**

Response:

There are no additional wastes proposed to be accepted with this application than what are currently permitted.

If you have any questions or require further information, please call.

Sincerely,

Weaver Consultants Group, LLC



Crystal Hardee
Environmental Manager

Attachments: Limited Scope Amendment Replacement Pages
Applicant Signature Page

cc: TCEQ Region 10
Bill Voigtman, Golden Triangle Landfill TX, LP
Kyle Gould, P.E., Weaver Consultants Group

LIMITED SCOPE AMENDMENT REPLACEMENT PAGES

**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-2027**

**SECTION 305.62(j)(2)
LIMITED SCOPE MAJOR PERMIT AMENDMENT
CLASS 1 WASTE ACCEPTANCE RATE AND
OPERATING HOURS CHANGE**

Prepared for

Golden Triangle Landfill TX, LP

April 2025

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC
TBPE Registration No. F-3727
6420 Southwest Blvd, Suite 206
Fort Worth, Texas 76109
817-735-9770

WCG Project No. 0120-436-11-117-01

CONTENTS

SECTION 305.62(J)(2) LIMITED SCOPE MAJOR PERMIT AMENDMENT NARRATIVE	1
1.0 INTRODUCTION	1
2.0 INCREASE OF CLASS 1 ACCEPTANCE RATE IS NEEDED TO SUPPORT AREA INDUSTRIES	1
3.0 COMPLIANCE WITH APPLICABLE SECTION 335 RULES (INDUSTRIAL SOLID WASTE DISPOSAL)	2
4.0 ADDITIONAL WASTE STRENGTH VERIFICATION PROCEDURE	23
5.0 OPERATING HOURS	34
6.0 SECTION 305.62(J)(2) LIMITED SCOPE MAJOR PERMIT AMENDMENT REPLACEMENT PAGES	34
7.0 SECTION 305.62(J)(2) LIMITED SCOPE MAJOR PERMIT AMENDMENT JUSTIFICATION	4

ATTACHMENT 1

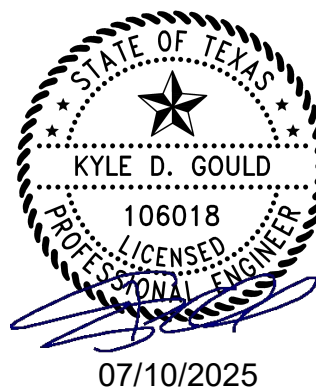
Section 305.62(j)(2) Limited Scope Major Permit Amendment Replacement Pages (Redline/Strikeout Version)

ATTACHMENT 2

Section 305.62(j)(2) Limited Scope Major Permit Amendment Replacement Pages (Clean Version)

ATTACHMENT 3

Mailing Labels (on CD in original copy only)



SECTION 305.62(J)(2) LIMITED SCOPE MAJOR PERMIT AMENDMENT NARRATIVE

1.0 Introduction

The purpose of this Section 305.62(j)(2) Limited Scope Major Permit Amendment is to (1) increase the annual percentage of Class 1 nonhazardous industrial waste (Class 1 Waste) from 20 percent to 90 percent of the total amount of waste (not including Class 1 Waste) accepted per year and (2) update the operating hours for the transportation of non-waste materials and heavy equipment operations at the Golden Triangle Landfill. The following sections discuss the need for these changes, compliance with all applicable regulations, additional measures proposed to verify key design parameters, and the justification for this Limited Scope Major Permit Amendment (LSMPA) application.

2.0 Increase of Class 1 Acceptance Rate is Needed to Support Area Industries

The Golden Triangle Landfill is named for the area that it supports. The term “Golden Triangle” refers to a metropolitan area of Southeast Texas, formed by the cities of which are the largest in the area, Beaumont, Port Arthur, and Orange. This area is the energy gateway for the State of Texas and the United States. The Golden Triangle area is home to the largest petrochemical, refining, and manufacturing complex in the nation and one of the largest ports in the country, housing more than 20 petrochemical facilities and 2 of the top 10 largest refineries in the United States. See below for additional information.

- The Golden Triangle area provides 50% of the nation’s commercial jet fuel and 78% of the military’s jet fuel.
- In 2023, Exxon Mobil completed a \$2 billion expansion making it the largest United States refinery.
- Motiva Port Arthur Refinery has grown to 1,400 acres (North America’s largest) and it’s throughput of 720,000 barrels per day is 2nd largest in North America.
- Chevron Phillips is currently constructing a \$8.5 billion polymer plant in Orange.
- Current industrial projects in the Golden Triangle area total over \$30 billion.

In recent years, the Class 1 Waste disposal needs of this area have increased substantially. It is estimated that Class 1 Waste generation in the Golden Triangle area has increased as much as 150% from 2020 to 2025. Class 1 Waste streams generated in the area not only include the wide variety of industries, but also a significant amount of remediation waste generated from environmental clean-up efforts. Typically, remediation waste can make up about half of the accepted Class 1 waste volume. For example, the site has contracted for various environmental remediation projects that involve the receipt of dredged material from channels and rivers (i.e., soil like material). It is expected that these projects will make up the vast majority of Class 1 waste to be received over the next few years. This material is handled as Class 1 waste given some of the material may in fact classify as Class 1 waste. However, most the dredged material is simply inert sediment. Given the complexity of testing this material, most generators simply classify this material as Class 1 waste, even though most of the material is inert. Additionally, over the last five years the site has seen a reduction in MSW disposal of at least 20%.

The trend of non-Municipal Solid Waste (MSW) increasing at landfills is not unique to this site. In recent years, the array of materials going to landfills has been expanding, and there has been a growing trend for MSW landfills to accept more and more non-MSW materials. In fact, 48 states now allow MSW landfills to accept non-MSW material, commonly referred to as industrial or special waste. Texas is the only state that has enhanced liner and operational requirements for Class 1 Waste. Over the past few decades, the composition of waste materials going to landfills has changed drastically, and it is expected that the acceptance of industrial and special wastes by MSW landfills will likely increase. For many of these wastes, a landfill is the most appropriate means to manage them because they were generated in a way that does not make it possible to reuse, recycle or divert the materials.

This proposed change to the Class 1 Waste acceptance percentage will provide the site operational flexibility to support the Golden Triangle area of Southeast Texas. Typically, the Class 1 Waste that is generated in the area is highly variable. The biggest variable is environmental remediation projects. The projects can vary dramatically in the amount of waste that needs to be handled. This permit condition change will provide the needed flexibility to manage the variability of the incoming waste stream from these type of projects.

3.0 Compliance with Applicable Section 335 Rules (Industrial Solid Waste Disposal)

The regulatory framework for the TAC 330 (MSW) rules incorporates applicable portions of the TAC 335 (Industrial Waste) rules. This includes various location restriction, design, and operational requirements. As noted by the TCEQ in the preamble for the 2006 rule revisions, this was done to, “... harmonize the Chapter 330 operational requirements for MSW landfills that dispose of Class 1 industrial solid waste with the requirements for commercial industrial nonhazardous waste landfills in Chapter 335, Subchapter T.”

The Golden Triangle Landfill has been authorized to accept Class 1 Waste since February 2014. The current Site Development Plan (SDP) and Site Operating Plan (SOP) address the applicable location restriction, design, and operational requirements listed in TAC Chapters 330 and 335. Therefore, the changes to the current SDP and SOP to increase the percentage of Class 1 Waste that can be accepted at the facility are minimal, as noted in Section 56.0 below, and the table included in Attachment 1.

4.0 Additional Waste Strength Verification Procedure

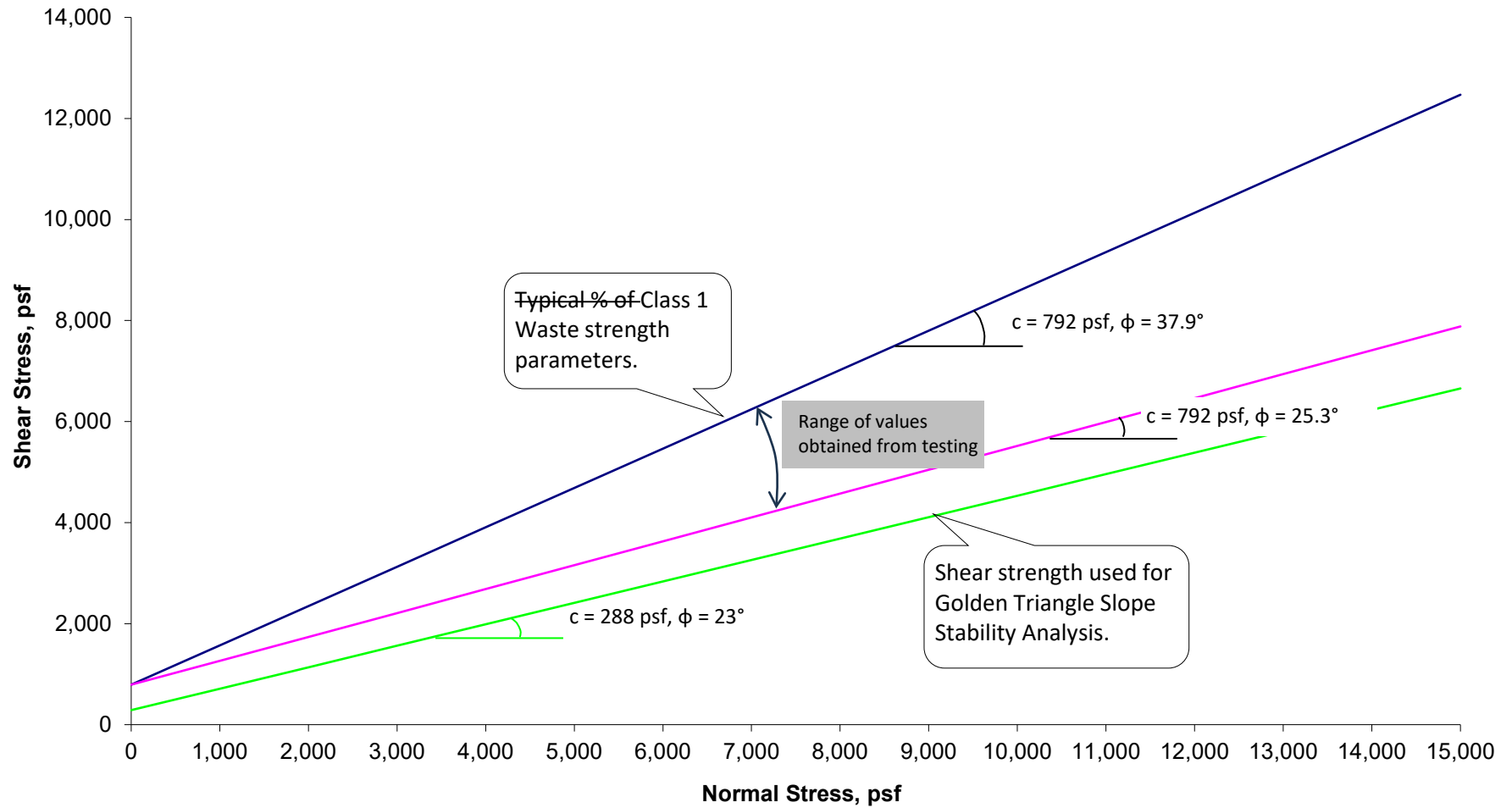
Republic Services and Weaver Consultants Group have completed a number of studies in the past on strength parameters of Class 1 Waste. Some of these studies were completed in areas that received 100 percent Class 1 Waste, as the sites at the time were permitted for designated Class 1 Waste only areas. The results of these studies are presented on Figure 1 – Direct Shear In-situ Waste Shear Strength Summary. This information was obtained by collecting in-situ samples from dedicated Class 1 Waste disposal areas to verify that the values used for the design of the Class 1 areas were appropriate.

The top two lines on Figure 1 represent the strength envelope based on the testing referenced in the previous paragraph. These values provide a good representation of actual Class 1 waste strength given that testing has taken place at multiple sites and has provided this range of values. As shown by the bottom line, the strength values used in the Golden Triangle stability analysis are conservatively less than what is reported from testing. It is expected that similar in-situ testing conducted at Golden Triangle (refer to below) will yield similar results as the top two lines.

The attached information is presented to demonstrate that increasing the Class 1 Waste Acceptance percentage from 20 percent to 90 percent will not change the current design or design demonstrations that are included in the current SDP (note that the analysis summarized in Figure 1 was completed on 100 percent Class 1 Waste). To provide further verification, we have included an in-situ strength verification program with this application. This program is included in Appendix J of the SDP and includes the following.

“Collect a minimum of three in-situ, undisturbed wastes samples in representative areas to perform shear strength laboratory testing by a third-party geotechnical laboratory to verify the in-situ waste shear strength parameters meet or exceed the values used for the design. This program will be completed annually for a period of five years. If the in-situ strength parameters are significantly lower than the design listed in the permit, an additional stability analysis will be completed to verify that the minimum required factor of safety values are met.”

Figure 1
Direct Shear Test In-Situ Waste Shear Strength Summary



We have included the above program as an extra step to ensure the increase in Class 1 Waste acceptance will not have a negative impact on the in-situ waste shear strength of the landfill. ~~change this key design parameter.~~

5.0 Operating Hours

This portion of the Section 305.62(j)(2) Limited Scope Major Permit Amendment requests to extend the operating hours for the transportation of non-waste materials and heavy equipment operations. Currently, the site is allowed to perform these activities Monday through Saturday from 4:00 a.m. to 9:00 p.m. This request would allow this operation 7 days per week during the same timeframe. This change will allow the site flexibility during construction events to work on Sundays to make up for inclement weather and complete construction in a timely fashion. Please note, no change to the hours of waste operation is being requested.

6.0 Section 305.62(j)(2) Limited Scope Major Permit Amendment Replacement Pages

Consistent with TCEQ requirements, applicable drawings and text within the existing Permit No. MSW-2027 that are affected by the changes in this Section 305.62(j)(2) Limited Scope Major Permit Amendment are included in Attachment 1 (redline/strikeout version). Attachment 2 presents proposed replacement pages (clean version). The table included in Attachment 1 contains a list of proposed replacement pages.

7.0 Section 305.62(j)(2) Limited Scope Major Permit Amendment Justification

As stated previously, the purpose of this Section 305.62(j)(2) Limited Scope Major Permit Amendment is to (1) increase the annual percentage of Class 1 Waste from 20 percent to 90 percent of the total amount of waste (not including Class 1 Waste) accepted per year and (2) update the operating hours for transportation of non-waste materials and heavy equipment operation at the Golden Triangle Landfill.

The proposed change to the allowable Class 1 Waste acceptance percentage will provide the site operational flexibility to support the Golden Triangle area of Southeast Texas. Typically, the Class 1 Waste that is generated in the area is highly variable, with the biggest variable being environmental remediation projects. These projects can vary dramatically in the amount of waste that needs to be handled and this permit condition change will provide the needed flexibility to manage the variability of the incoming waste stream from these type of projects.

Additionally, the extension of operating hours for the transportation of non-waste materials and heavy equipment operation will provide flexibility for the site to complete construction events in a timely manner.

ATTACHMENT 1

**§305.62(j)(2) LIMITED SCOPE MAJOR PERMIT AMENDMENT
REPLACEMENT PAGES**

(REDLINE/STRIKEOUT VERSION)

INTRODUCTION

The following replacement pages have been developed to replace applicable sections of the current Site Development Plan and Site Operating Plan. The following table summarizes the proposed replacement pages for the currently approved plans.

Site Development Plan and Site Operating Plan Replacement Pages

Replacement or Additional Page Number	Explanation
Part A Cover Page and Forms	Complete replacement.
Site Operating Plan, Cover Page	Page has been signed and sealed for updated SOP.
Site Operating Plan, Page 16	Updated to change operating hours.
Site Operating Plan, Pages 37e and 37g	Updated to increase Class 1 Waste percentage and how the site will track Class 1 Waste.
Site Operating Plan, Appendix C – Special Waste Acceptance Plan, Cover Page	Page has been signed and sealed for updated SOP.
Site Operating Plan, Appendix C, Page C-15	Updated to increase Class 1 Waste percentage.
Site Development Plan, Cover Page	Page has been signed and sealed for updated SDP.
Attachment 8 – Cost Estimate for Closure and Postclosure Care, Cover Page	Page has been signed and sealed for updated SDP.
Attachment 8 – Cost Estimate for Closure and Postclosure Care, Pages 8-2 and 8-3	Updated to include in-situ testing and adjust GCCS installation to what is permitted.
Appendix J – Class 1 Waste Disposal Area Design, Cover Page	Page has been signed and sealed for updated SDP.
Appendix J – Class 1 Waste Disposal Area Design, Pages J-1 and J-1a	Updated to increase Class 1 Waste percentage, to reference confirmatory in-situ testing, and discuss test results measures.

**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-2027**

SITE OPERATING PLAN

Prepared for

Golden Triangle Landfill TX, LP

TCEQ Approved July 21, 2006

Revised June 2007

Revised May 2009

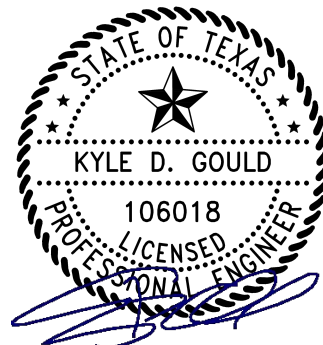
Revised November 2011

Revised October 2013

Revised January 2017

Revised November 2018

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC

TBPE Registration No. F-3727

6420 Southwest Blvd., Suite 206

Fort Worth, Texas 76109

817-735-9770

WCG Project No. 0120-436-11-117-01

This document is intended for permitting purposes only.

report will contain other information requested on the form, typically including amount of other wastes received, the facility operator's name, address, and phone number, the permit number, and other information as requested. The required quarterly report will be submitted to the TCEQ within the timeframe required by the TCEQ.

4.20.7.8 Contingency Plan

Should an incident occur where hazardous wastes, radioactive waste, or other prohibited wastes are suspected or discovered, the waste will not be authorized for disposal but, instead, it will be isolated until the material can be adequately identified to determine the proper disposition/remediation of the material and the appropriate handling procedures. During this identification process, the generator's representative will be contacted to determine the identity of the material. The proper disposition/remediation of the prohibited waste will be specific to the waste.

Should any accidental spills of special wastes occur on this site they will be immediately contained by earthen dikes, berms or by other appropriate measures. The Landfill Manager, or his designee, shall be promptly notified of the spill and shall coordinate the collection and disposal of the spilled material. The spilled wastes will be picked up mechanically or by employees wearing proper protective equipment and managed according to procedures for handling the special waste.

The Landfill Manager, or his designee, will note in the Site Operating Record the time, date, and details of the incident.

4.20.7.9 Class 1 Nonhazardous Industrial Waste Acceptance Limits

The facility will not accept Class 1 industrial solid waste in excess of 90 percent of the total amount of waste (not including Class 1 waste) accepted during the current year. The amount of waste may be determined by volume or by weight, but the same unit of measure must be used for each year. ~~In addition, when the Class 1 disposal area is extended above the perimeter berm elevation, construction of containment dikes along the exterior sideslope of the landfill is required (refer to Appendix J of the SOP).~~ The site will track Class 1 waste acceptance on a monthly basis to ensure the 90 percent threshold is not exceeded. The site will also submit Class 1 waste reports to the TCEQ on a quarterly and annual basis. Monthly reports can be provided to the TCEQ at the request of TCEQ.

**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-1149B2027**

SITE OPERATING PLAN

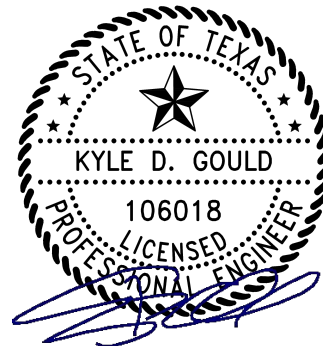
**APPENDIX C
SPECIAL WASTE ACCEPTANCE PLAN**

Prepared for

Golden Triangle Landfill TX, LP

October 2013

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC
TBPE Registration No. F-3727
6420 Southwest Blvd., Suite 206
Fort Worth, Texas 76109
817-735-9770

WCG Project No. 0120-436-11-117-01

This document is intended for permitting purposes only.

**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-2027**

SITE DEVELOPMENT PLAN

Prepared for

Golden Triangle Landfill TX, LP

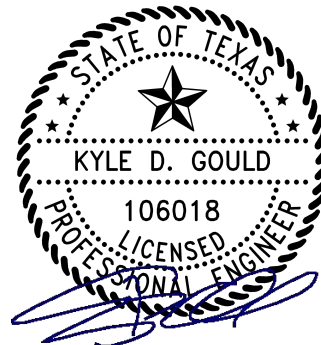
April 1994

Revised January 2008

Revised October 2013

Revised January 2017

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC

TBPE Registration No. F-3727

6420 Southwest Blvd., Suite 206

Fort Worth, Texas 76109

817-735-9770

WCG Project No. 0120-436-11-117-01

This document is intended for permitting purposes only.

**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. 2027**

ATTACHMENT 8

**COST ESTIMATE FOR CLOSURE
AND POSTCLOSURE CARE**

Prepared for

Golden Triangle Landfill TX, LP

March 1997

Revised September 2005

Revised October 2013

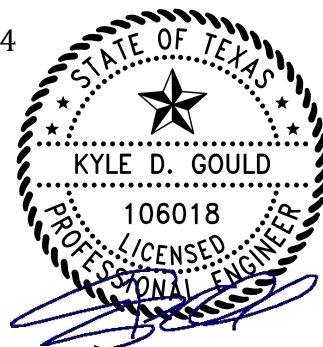
Revised April 2017

Revised June 2020

Revised October 2023

Revised December 2024

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC
TBPE Registration No. F-3727
6420 Southwest Blvd, Suite 206
Fort Worth, Texas 76109
817-735-9770

Project No. 0120-436-11-117

2 CLOSURE COST ESTIMATE

This cost estimate shows the cost of hiring a third party to close the largest area ever requiring closure at any time during the active life of the landfill. The closure cost estimate includes: 1) engineering costs required to administratively close the facility; 2) construction costs involved with the construction of the final cover system, the landfill gas system, and other activities required to close the facility, and 3) contingencies and other administrative costs that may be incurred during closure activities. A summary of closure cost estimate is presented on Table 1. The costs will be adjusted annually as indicated in Section 4. Additional information regarding the closure cost estimate is summarized below.

2.1 Engineering Costs

The existing costs are based on closing the largest area scheduled to receive final cover, which is 166.4 acres. A topographic survey will be required to determine the existing height and top slope of the landfill so that permit compliance can be evaluated and the final closure system, drainage system, and final grading can be engineered. An inspection of the site is included to identify any disposal areas requiring closure, drainage and erosion protection improvements, and identify any potential regulatory deficiencies. In-situ testing of the Class 1 waste disposal area will also be completed, per Appendix J. The engineering costs include the cost to develop construction plans and closure schedules, closure testing and inspections, and permit document preparation. In addition, administration costs (i.e., for construction contracts) have also been included.

2.2 Construction Costs

As shown on Figure 1, construction costs include construction of the final cover system drainage improvements, and completion of the existing landfill gas extraction wells for the 166.4-acre area. The final cover system consists of an 18-inch-thick infiltration layer (clay cap) (48-inch-thick infiltration layer for the Class 1 area), a flexible membrane cover, a drainage layer, and an erosion layer consisting of 6 inches of earthen material capable of sustaining plant growth (24-inch-thick erosion layer for the Class 1 area). The construction costs include site grading and drainage including the final grading of the site, drainage improvements, and erosion and sedimentation controls for proper closure of the site. The construction costs for the landfill gas extraction system includes extending 9236 gas wells above the top of final cover.

**TABLE 1
GOLDEN TRIANGLE LANDFILL - CLOSURE COST**

Area Requiring Final Cover	166.4	ac	Infiltration Layer Thickness (MSW Area)	1.5	ft
Permit Boundary Area	387.5	ac	Erosion Layer Thickness (MSW Area)	0.5	ft
			Drainage Layer (MSW Area)	0.5	ft
MSW Area	116.0	ac	Infiltration Layer Thickness (Class 1 Area)	4	ft
Class 1 Area	50.4	ac	Erosion Layer Thickness (Class 1 Area)	2	ft

Description	Quantity	Unit ¹	Unit Cost	1996 Total Cost	Inflation Factor ²		2024 Total Cost	2025
1.0 ENGINEERING								
1.1 Topographic Survey	166.4	AC	\$ 15	\$2,496	1.824	1.865	\$4,546	\$4,655
1.2 Site Evaluation	Included in 1.6							
1.3 Development of Plans	Included in 1.6							
1.4 Contract Administration	Included in 1.6							
1.5 Administration Cost	Included in 1.6							
1.6 Closure Inspection and Testing	166.4	AC	\$ 3,500	\$582,400	1.824	1.865	\$1,060,550	\$1,086,234
1.7 Permits	Included in 1.6							
1.8 Class 1 In-situ Testing ⁵	1	LS	\$ 21,000	\$21,000		1.0		\$21,000
ENGINEERING TOTAL				\$584,896			\$1,066,097	\$1,111,890
2.0 CONSTRUCTION								
2.1a Final Cover System (MSW Area)								
2.1.1 Infiltration Layer	280,720	CY	\$ 3.00	\$842,200	1.824	1.865	\$1,533,573	\$1,570,713
2.1.2 Flexible Membrane Cover	5,052,960	SF	\$ 0.35	\$1,768,500	1.824	1.865	\$3,220,504	\$3,298,496
2.1.3 Drainage Layer	93,573	CY	\$ 10.00	\$935,700	1.824	1.865	\$1,703,970	\$1,745,236
2.1.4 Erosion Layer	93,573	CY	\$ 2.00	\$187,100	1.824	1.865	\$340,794	\$349,047
2.1b Final Cover System (Class 1 Area)								
2.1b.1 Infiltration Layer	325,248	CY	\$ 3.00	\$975,700	1.824	1.865	\$1,776,830	\$1,819,860
2.1b.2 Flexible Membrane Cover	2,195,424	SF	\$ 0.35	\$768,400	1.824	1.865	\$1,399,253	\$1,433,140
2.1b.3 Drainage Layer	2,195,424	SF	\$ 0.35	\$768,400	1.824	1.865	\$1,399,253	\$1,433,140
2.1b.4 Erosion Layer	162,624	CY	\$ 2.00	\$325,200	1.824	1.865	\$592,277	\$606,620
2.2 Revegetation	166.4	AC	\$ 1,000	\$166,400	1.824	1.865	\$303,044	\$310,353
2.3 Site Grading and Drainage	166.4	AC	\$ 1,000	\$166,400	1.824	1.865	\$303,044	\$310,353
2.4 Completion of Gas Extraction System ³	36	WELLS	\$ 9,806	\$353,016	1.000	1.024	\$353,016	\$361,488
2.5 Liquid Waste Bulking Facility ⁴	1	LS		\$45,000	1.305	1.336	\$58,725	\$60,129
CONSTRUCTION TOTAL				\$7,302,016			\$12,984,225	\$13,298,575
TOTAL CLOSURE COST				\$7,886,912			\$14,049,322	\$14,410,465

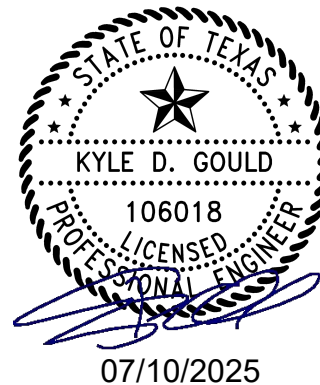
¹AC = acres, CY = cubic yards, SF = square feet, LS = lump sum.

²Inflation factor is the product of the inflation factors for each year between 1996 and 2023 2024

³Includes the installation of future extraction wells in areas without an existing gas extraction system as shown on Figure 1. Cost shown is adjusted for period 2024 to 2025.

⁴Cost for liquid waste bulking facility is in 2013 dollars. Inflation factor is the product of the inflation factors each year between 2013 and 2023 2024.

⁵Cost for Class 1 In-situ Testing is in 2025 dollars.



**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-2027**

APPENDIX J

CLASS 1 WASTE DISPOSAL AREA DESIGN

Prepared for

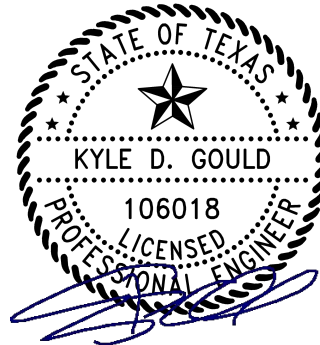
Golden Triangle Landfill TX, LP

October 2013

Revised April 2017

Revised May 2017

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC

TBPE Registration No. F-3727

6420 Southwest Boulevard, Suite 206

Fort Worth, Texas 76109

817-735-9770

WCG Project No. 0120-436-11-117-01

This document is intended for permitting purposes only.

1 PURPOSE

The purpose of this appendix is to provide the details for two above grade Class 1 nonhazardous industrial solid waste (Class 1 waste) disposal options. Class 1 waste disposal area design is discussed in Section 2. Drawings that show the location of Class 1 waste disposal and details of Class 1 waste disposal are shown in Attachments 1 and 7. Section 3 provides the Class 1 waste stability analysis and Section 4 presents a demonstration of how the site design complies with the groundwater location restrictions listed in §330.549(a).

The facility will not accept Class 1 industrial solid waste in excess of 90 percent of the total amount of waste (not including Class 1 Waste) accepted during the current year. The amount of waste may be determined by volume or by weight, but the same unit of measure must be used for each year. As confirmation of Class 1 Waste stability under this disposal condition, the site will conduct the following in-situ strength verification program.

Collect a minimum of three in-situ, undisturbed wastes samples in representative areas to perform shear strength laboratory testing by a third-party geotechnical laboratory to verify the in-situ waste shear strength parameters meet or exceed the values used for the design. This program will be completed annually for a period of five years. If the in-situ strength parameters are significantly lower than the design listed in the permit, an additional stability analysis will be completed to verify that the minimum required factor of safety values are met.

In the event that the updated stability analysis reveals factor of safety values less than the permitted minimum factor of safety (i.e., 1.5) a permit modification will be submitted to address the following.

- Update permitted internal and external slopes and waste fill elevations to accommodate in-situ test results.
- Adjust necessary stability analysis parameters based on in-situ test results.
- Update factor of safety values to be reflected of the first two bullets.

Additionally, the site will adjust their operational practices (e.g., fill slopes/heights, solidification, etc.) and potentially relocate disposed waste to be consistent with updated permit requirements.

Section 5 discusses the results of an additional subsurface investigation that was performed by Weaver Boos Consultants, LLC – Southwest (WBC) in June 2013 at the Golden Triangle Landfill. As part of the subsurface investigation, 9 borings were drilled within the proposed Class 1 waste disposal area. The purpose of the subsurface investigation was to demonstrate compliance with the applicable groundwater location restriction requirement included in §335.584(b)(1) and referenced in Sections 4.1 and 4.3 for Class 1 waste disposal.

ATTACHMENT 2

**§305.62(j)(2) LIMITED SCOPE MAJOR PERMIT AMENDMENT
REPLACEMENT PAGES**

(CLEAN VERSION)

**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-2027**

SITE OPERATING PLAN

Prepared for

Golden Triangle Landfill TX, LP

TCEQ Approved July 21, 2006

Revised June 2007

Revised May 2009

Revised November 2011

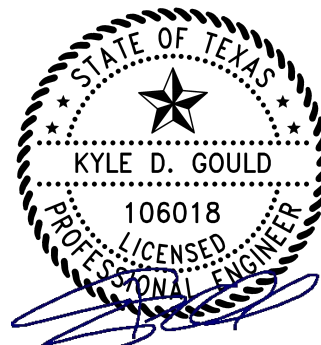
Revised October 2013

Revised January 2017

Revised November 2018

Revised April 2025

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC

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WCG Project No. 0120-436-11-117-01

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report will contain other information requested on the form, typically including amount of other wastes received, the facility operator's name, address, and phone number, the permit number, and other information as requested. The required quarterly report will be submitted to the TCEQ within the timeframe required by the TCEQ.

4.20.7.8 Contingency Plan

Should an incident occur where hazardous wastes, radioactive waste, or other prohibited wastes are suspected or discovered, the waste will not be authorized for disposal but, instead, it will be isolated until the material can be adequately identified to determine the proper disposition/remediation of the material and the appropriate handling procedures. During this identification process, the generator's representative will be contacted to determine the identity of the material. The proper disposition/remediation of the prohibited waste will be specific to the waste.

Should any accidental spills of special wastes occur on this site they will be immediately contained by earthen dikes, berms or by other appropriate measures. The Landfill Manager, or his designee, shall be promptly notified of the spill and shall coordinate the collection and disposal of the spilled material. The spilled wastes will be picked up mechanically or by employees wearing proper protective equipment and managed according to procedures for handling the special waste.

The Landfill Manager, or his designee, will note in the Site Operating Record the time, date, and details of the incident.

4.20.7.9 Class 1 Nonhazardous Industrial Waste Acceptance Limits

The facility will not accept Class 1 industrial solid waste in excess of 90 percent of the total amount of waste (not including Class 1 waste) accepted during the current year. The amount of waste may be determined by volume or by weight, but the same unit of measure must be used for each year. The site will track Class 1 waste acceptance on a monthly basis to ensure the 90 percent threshold is not exceeded. The site will also submit Class 1 waste reports to the TCEQ on a quarterly and annual basis. Monthly reports can be provided to the TCEQ at the request of TCEQ.

**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-2027**

SITE OPERATING PLAN

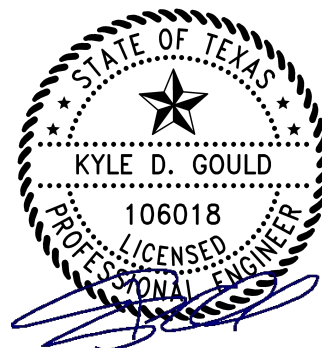
**APPENDIX C
SPECIAL WASTE ACCEPTANCE PLAN**

Prepared for

Golden Triangle Landfill TX, LP

October 2013

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC
TBPE Registration No. F-3727
6420 Southwest Blvd., Suite 206
Fort Worth, Texas 76109
817-735-9770

WCG Project No. 0120-436-11-117-01

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**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-2027**

SITE DEVELOPMENT PLAN

Prepared for

Golden Triangle Landfill TX, LP

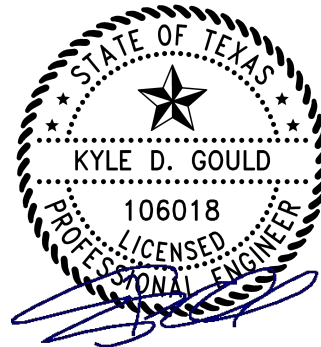
April 1994

Revised January 2008

Revised October 2013

Revised January 2017

Revised July 2025



Prepared by

07/10/2025

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WCG Project No. 0120-436-11-117-01

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**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. 2027**

ATTACHMENT 8

**COST ESTIMATE FOR CLOSURE
AND POSTCLOSURE CARE**

Prepared for

Golden Triangle Landfill TX, LP

March 1997

Revised September 2005

Revised October 2013

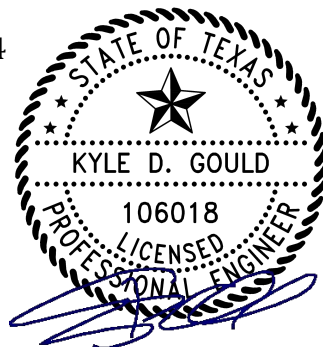
Revised April 2017

Revised June 2020

Revised October 2023

Revised December 2024

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC
TBPE Registration No. F-3727
6420 Southwest Blvd, Suite 206
Fort Worth, Texas 76109
817-735-9770

Project No. 0120-436-11-117

2 CLOSURE COST ESTIMATE

This cost estimate shows the cost of hiring a third party to close the largest area ever requiring closure at any time during the active life of the landfill. The closure cost estimate includes: 1) engineering costs required to administratively close the facility; 2) construction costs involved with the construction of the final cover system, the landfill gas system, and other activities required to close the facility, and 3) contingencies and other administrative costs that may be incurred during closure activities. A summary of closure cost estimate is presented on Table 1. The costs will be adjusted annually as indicated in Section 4. Additional information regarding the closure cost estimate is summarized below.

2.1 Engineering Costs

The existing costs are based on closing the largest area scheduled to receive final cover, which is 166.4 acres. A topographic survey will be required to determine the existing height and top slope of the landfill so that permit compliance can be evaluated and the final closure system, drainage system, and final grading can be engineered. An inspection of the site is included to identify any disposal areas requiring closure, drainage and erosion protection improvements, and identify any potential regulatory deficiencies. In-situ testing of the Class 1 waste disposal area will also be completed, per Appendix J. The engineering costs include the cost to develop construction plans and closure schedules, closure testing and inspections, and permit document preparation. In addition, administration costs (i.e., for construction contracts) have also been included.

2.2 Construction Costs

As shown on Figure 1, construction costs include construction of the final cover system drainage improvements, and completion of the existing landfill gas extraction wells for the 166.4-acre area. The final cover system consists of an 18-inch-thick infiltration layer (clay cap) (48-inch-thick infiltration layer for the Class 1 area), a flexible membrane cover, a drainage layer, and an erosion layer consisting of 6 inches of earthen material capable of sustaining plant growth (24-inch-thick erosion layer for the Class 1 area). The construction costs include site grading and drainage including the final grading of the site, drainage improvements, and erosion and sedimentation controls for proper closure of the site. The construction costs for the landfill gas extraction system includes extending 36 gas wells above the top of final cover.

**TABLE 1
GOLDEN TRIANGLE LANDFILL - CLOSURE COST**

Area Requiring Final Cover	166.4	ac	Infiltration Layer Thickness (MSW Area)	1.5 ft
Permit Boundary Area	387.5	ac	Erosion Layer Thickness (MSW Area)	0.5 ft
			Drainage Layer (MSW Area)	0.5 ft
MSW Area	116.0	ac	Infiltration Layer Thickness (Class 1 Area)	4 ft
Class 1 Area	50.4	ac	Erosion Layer Thickness (Class 1 Area)	2 ft

Description	Quantity	Unit ¹	Unit Cost	1996 Total Cost	Inflation Factor ²	2025 Total Cost
1.0 ENGINEERING						
1.1 Topographic Survey	166.4	AC	\$ 15	\$2,496	1.865	\$4,655
1.2 Site Evaluation	Included in 1.6					
1.3 Development of Plans	Included in 1.6					
1.4 Contract Administration	Included in 1.6					
1.5 Administration Cost	Included in 1.6					
1.6 Closure Inspection and Testing	166.4	AC	\$ 3,500	\$582,400	1.865	\$1,086,234
1.7 Permits	Included in 1.6					
1.8 Class 1 In-situ Testing ⁵	1	LS	\$ 21,000	\$21,000	1	\$21,000
ENGINEERING TOTAL				\$584,896		\$1,111,890
2.0 CONSTRUCTION						
2.1a Final Cover System (MSW Area)						
2.1.1 Infiltration Layer	280,720	CY	\$ 3.00	\$842,200	1.865	\$1,570,713
2.1.2 Flexible Membrane Cover	5,052,960	SF	\$ 0.35	\$1,768,500	1.865	\$3,298,496
2.1.3 Drainage Layer	93,573	CY	\$ 10.00	\$935,700	1.865	\$1,745,236
2.1.4 Erosion Layer	93,573	CY	\$ 2.00	\$187,100	1.865	\$349,047
2.1b Final Cover System (Class 1 Area)						
2.1b.1 Infiltration Layer	325,248	CY	\$ 3.00	\$975,700	1.865	\$1,819,860
2.1b.2 Flexible Membrane Cover	2,195,424	SF	\$ 0.35	\$768,400	1.865	\$1,433,140
2.1b.3 Drainage Layer	2,195,424	SF	\$ 0.35	\$768,400	1.865	\$1,433,140
2.1b.4 Erosion Layer	162,624	CY	\$ 2.00	\$325,200	1.865	\$606,620
2.2 Revegetation	166.4	AC	\$ 1,000	\$166,400	1.865	\$310,353
2.3 Site Grading and Drainage	166.4	AC	\$ 1,000	\$166,400	1.865	\$310,353
2.4 Completion of Gas Extraction System ³	36	WELLS	\$ 9,806	\$353,016	1.024	\$361,488
2.5 Liquid Waste Bulking Facility ⁴	1	LS		\$45,000	1.336	\$60,129
CONSTRUCTION TOTAL				\$7,302,016		\$13,298,575
TOTAL CLOSURE COST				\$7,886,912		\$14,410,465

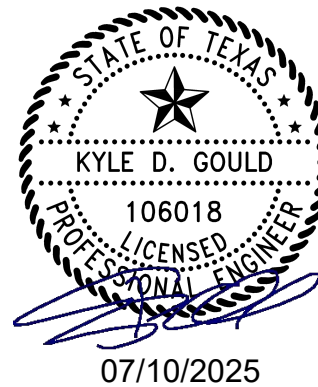
¹AC = acres, CY = cubic yards, SF = square feet, LS = lump sum.

²Inflation factor is the product of the inflation factors for each year between 1996 and 2024

³Includes the installation of future extraction wells in areas without an existing gas extraction system as shown on Figure 1. Cost shown is adjusted for period 2024 to 2025.

⁴Cost for liquid waste bulking facility is in 2013 dollars. Inflation factor is the product of the inflation factors each year between 2013 and 2024.

⁵Cost for Class 1 In-situ Testing is in 2025 dollars.



**GOLDEN TRIANGLE LANDFILL
JEFFERSON COUNTY, TEXAS
TCEQ PERMIT NO. MSW-2027**

APPENDIX J

CLASS 1 WASTE DISPOSAL AREA DESIGN

Prepared for

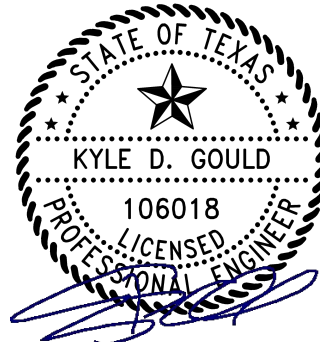
Golden Triangle Landfill TX, LP

October 2013

Revised April 2017

Revised May 2017

Revised July 2025



Prepared by

07/10/2025

Weaver Consultants Group, LLC

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6420 Southwest Boulevard, Suite 206

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WCG Project No. 0120-436-11-117-01

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1 PURPOSE

The purpose of this appendix is to provide the details for two above grade Class 1 nonhazardous industrial solid waste (Class 1 waste) disposal options. Class 1 waste disposal area design is discussed in Section 2. Drawings that show the location of Class 1 waste disposal and details of Class 1 waste disposal are shown in Attachments 1 and 7. Section 3 provides the Class 1 waste stability analysis and Section 4 presents a demonstration of how the site design complies with the groundwater location restrictions listed in §330.549(a).

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In the event that the updated stability analysis reveals factor of safety values less than the permitted minimum factor of safety (i.e., 1.5) a permit modification will be submitted to address the following.

- Update permitted internal and external slopes and waste fill elevations to accommodate in-situ test results.
- Adjust necessary stability analysis parameters based on in-situ test results.
- Update factor of safety values to be reflected of the first two bullets.

Additionally, the site will adjust their operational practices (e.g., fill slopes/heights, solidification, etc.) and potentially relocate disposed waste to be consistent with updated permit requirements.

Section 5 discusses the results of an additional subsurface investigation that was performed by Weaver Boos Consultants, LLC – Southwest (WBC) in June 2013 at the Golden Triangle Landfill. As part of the subsurface investigation, 9 borings were drilled within the proposed Class 1 waste disposal area. The purpose of the subsurface investigation was to demonstrate compliance with the applicable groundwater location restriction requirement included in §335.584(b)(1) and referenced in Sections 4.1 and 4.3 for Class 1 waste disposal.

APPLICANT SIGNATURE PAGE

Applicant Signature Page

Site Operator (Permittee or Registrant Name) 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: Crystal Hardee Title: Environmental Manager

Email Address: [REDACTED]

Signature: *Crystal Hardee* Date: 07/10/2025

Authorization by Facility Owner for Operator to Submit Application

To be completed by the facility owner if the application is submitted by an operator who is not the facility owner.

I am the owner of the facility that is the subject of this application, and authorize the operator, _____ to submit this application pursuant to 30 TAC [305.43\(c\)](#).

Name: _____ Title: _____

Email Address: _____

Signature: _____ Date: _____

Notary

SUBSCRIBED AND SWORN to before me by the said Crystal Hardee

On this 10th day of July, 2025

My commission expires on the 11th day of August, 2026

Stacy M. Wilson

Notary Public in and for

Tarrant, Texas (notary's jurisdiction, including county and state)

Note: Application Must Bear Signature & Seal of Notary Public

