



# Texas Commission on Environmental Quality Waste Permits Division Correspondence Cover Sheet

Date: 1/13/2025

Facility Name: K2 Waste Solutions, LLC Waste Transfer Station

Permit or Registration No.: 2394A

Nature of Correspondence:

Initial/New

Response/Revision to TCEQ Tracking No.: 30007614 (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 checked="" type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input 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:	

Project No. AHF2300405  
January 13, 2025

1011 W. Lewis Street  
Conroe, TX 77301

Ms. Madison Howard  
Project Manager  
Municipal Solid Waste Permits

P 281.210.0084  
F 832.442.5066  
TBPE Firm F-3257  
TBPG Firm 50220

[WWW.RKCI.COM](http://WWW.RKCI.COM)

Waste Permits Division  
Texas Commission on Environmental Quality

**RE: K2 Waste Solutions, LLC Waste Transfer Station  
Dayton, Liberty County, Texas  
Proposed Municipal Solid Waste Permit Number: 2394A  
Tracking No. 30007614; RN109452870/CN605248467 & CN604942383  
Type V Transfer Station Permit Major Amendment Application**

Dear Ms. Howard:

On behalf of K2 Waste Solutions, LLC, Raba Kistner, Inc. (RKI), has prepared a response document after receiving a second Technical Notice of Deficiency (NOD) email notification addressed to Mr. Bill Killian on December 13<sup>th</sup>, 2024. This email and corresponding attachment identified seven (7) items requiring attention. Please find a table of those items below including a brief explanation of how each item was resolved and the location where the revisions were made.

NOD ID	Application Part	Citation	Location	NOD Type	NOD Description	Response	Location of Revision
1	I		Table of Contents	Format	All tables of contents should include page numbers of the sections.	Page numbers have been included	Table of Contents within Parts 2-4
2	II	330.61 (b)(1)	Section 2.1.2	Incomplete	Provide the name(s) and MSW permit number(s) of the landfill waste will be transported to. Also, provide the name and MSW number of the facility recyclables will be taken to.	Facilities that can accept waste and recyclables identified.	Part II, Section 2.1.2
3	II	330.61 (i)(2)	Section 9.2	Incomplete	Specify whether the 10,517 daily users of FM 1960 are only within one mile of the facility. Also, provide data on expected volumes of traffic within one mile of the facility for the life of the facility.	Clarification included. Expected volumes forecasted over life of facility also included	Part II, Section 9.2
4	II	330.61 (b)	Section 2	Incomplete	Provide a detailed description of the recycling operation.	Description of recycling operation included	Part II, Section 2.1.2
5	III		Figure III-D	Incomplete	<ul style="list-style-type: none"> <li>Provide a figure number on Pt. 3 Pg. 27.</li> <li>Provide a P.E. seal.</li> </ul>	Figure updated to include PE seal and figure number	Figure III-D

NOD ID	Application Part	Citation	Location	NOD Type	NOD Description	Response	Location of Revision
6	IV	330.205	Section 5	Ambiguous	Provide documentation that all wastes leaving the facility can be adequately managed by other facilities at the volumes and concentrations estimated in the facility design. Identifying a facility that is authorized to accept the waste would be considered adequate documentation.	Facilities authorized to accept waste added in response to this NOD item.	Part IV, Section 5
7	IV	330.229	Section 15	Inconsistent	Section 15.2 states operating hours will be 1 hour before and 2 hours after waste acceptance hours. Clarify whether Saturday's operating hours will be until 9 pm as stated in Section 15.	Clarification added that operating hours of 5 am to 9 pm include Saturday.	Part IV, Section 15.2

We greatly appreciate the prompt review of the application package and look forward to completing the technical review process. Please contact us at (972) 385-8069 or by email should you have any questions.

Very truly yours,

**RABA KISTNER INC.**



Dante Fekete  
 Project Manager – Compliance



Amelia Hudson  
 Assistant Director - Compliance

DF/AH

Copies Submitted: Mr. Bill Killian – K2 Waste Solutions, LLC (electronic)  
 Ms. Karina Rocha – TCEQ Region 12 Waste Section Manager

Attachments: (1) Revised permit application pages and (1) updated signatory page  
 (1) Redline/Strikethrough format of permit application pages

**K2 WASTE SOLUTIONS, LLC  
WASTE TRANSFER STATION  
MSW PERMIT No. 2394A**

**MAJOR PERMIT AMENDMENT  
PART II**

PREPARED BY:



**RABA KISTNER, INC.**  
19111 NORTH DALLAS PARKWAY, SUITE 310  
DALLAS, TX 75287

**RKI PROJECT NO. AHF2300405**

**JULY 2024  
REV. JAN. 2025**



A handwritten signature in black ink that reads 'H. M. Barrett'.

January 13, 2025

Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station

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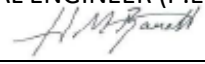
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K2 Waste Solutions, LLC Waste Transfer Station

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PROFESSIONAL ENGINEER (P.E.) CERTIFICATION:

SIGNATURE: 

NAME: Howard M. Barrett, PE

COMPANY: Raba Kistner, Inc.

TITLE: Vice President / Principal Engineer, PE

DATE: January 13, 2025

PE Registration Number  
Texas No. 126292



**K2 WASTE SOLUTIONS, LLC  
WASTE TRANSFER STATION  
MSW PERMIT No. 2394A**

**MAJOR PERMIT AMENDMENT  
PART III**

PREPARED BY:



**RABA KISTNER, INC.**  
19111 NORTH DALLAS PARKWAY, SUITE 310  
DALLAS, TX 75287

**RKI PROJECT NO. AHF2300405**

**JULY 2024  
REV. JAN. 2025**



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January 13, 2025



Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station

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PROFESSIONAL ENGINEER (P.E.) CERTIFICATION:

SIGNATURE: 

NAME: Howard M. Barrett, PE

COMPANY: Raba Kistner, Inc.

TITLE: Vice President / Principal Engineer, PE

DATE: January 13, 2025

PE Registration Number

Texas No. 126292



**K2 WASTE SOLUTIONS, LLC.  
WASTE TRANSFER STATION  
MSW PERMIT No. 2394A**

**MAJOR PERMIT AMENDMENT  
PART IV**

PREPARED BY:



**RABA KISTNER, INC.**  
19111 NORTH DALLAS PARKWAY, SUITE 310  
DALLAS, TX 75287

**RKI PROJECT NO. AHF2300405**

**JULY 2024**  
**REV. JAN. 2025**



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January 13, 2025

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Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station

PROFESSIONAL ENGINEER (P.E.) CERTIFICATION:

SIGNATURE: 

NAME: Howard M. Barrett, PE

COMPANY: Raba Kistner, Inc.

TITLE: Vice President / Principal Engineer, PE

DATE: January 13, 2025

PE Registration Number

Texas No. 126292



Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station – Part II

Maximum Amount of Solid Waste to be Stored at the Facility - It is proposed that the facility be permitted for a maximum 72-hour storage volume of 900 tons of municipal solid waste. Each transfer trailer will be filled and dispatched to a TCEQ-approved landfill as rapidly as possible. Under normal operating conditions, solid waste should be hauled to the landfill at least once per day. In no event will the solid waste be stored at the transfer station longer than 72 hours. The average length of time that solid waste will be stored onsite is 24-48 hours.

To address any logistical concerns the maximum daily rate exceeding the 72-hour holding volume amount, K2 Waste Solutions has full control of the incoming waste volume accepted into the facility. K2 Waste Solutions will track incoming volume throughout the day, every day, and will also track outgoing volume daily. The facility operator is a waste collection and transportation company, and should overnight storage be necessary, they have the ability to control incoming waste volumes and divert incoming loads directly to a landfill for direct disposal, in order to maintain a maximum overnight storage capacity of 900 tons within the building.

Based on building dimensions of 150' x 100', calculations were completed to demonstrate the feasibility of storing up to 900 tons overnight. Floor space dedicated to the following operations was excluded from the calculations:

- 150' x 30' passage on the east side of the building for trailer and route truck loading/unloading as well as loader movement for waste placement;
- 60' x 30' passage for equipment access on the south side of the building; and
- 150' x 10' buffer space along the west side of the building.

An approximately 120' x 60' space remains for waste storage. Waste will be stored up to a height of 12' with side slopes of 0.5:1. Based on this information, the volume of waste storage has been calculated to be at least 2,736 cubic yards, or 912 tons.

Intended Destination of Solid Waste Received at this Facility - All waste collected at the facility will be loaded onto transport trucks and driven to a TCEQ-approved landfill or otherwise authorized facility for disposal. K2 Waste Solutions, LLC desires to transport their waste eastward away from the traffic and population centers of the Houston/Humble area to allow for easier transport. The closest facility which may accept waste is the WM - Atascocita Recycling and Disposal Facility (MSW Authorization No. 1307D). However, there are several TCEQ-approved landfills located to the east, northeast, and southeast of the proposed transfer station which waste may also be transported to. Segregated and/or sorted recyclables including cardboard and metals may be staged within the Transfer Station and will be transported to recycling facilities including but not limited to the Atascocita Recycling and Disposal Facility, or other duly authorized facility in the greater Houston Metropolitan Area.

**2.1.3 MAXIMUM ANNUAL WASTE ACCEPTANCE RATE FOR PROPOSED LANDFILLS[30 TAC §330.61(b)(1)(C)]** - Not applicable for this facility. This requirement pertains to landfills, not transfer stations.

**2.2 REGISTRATION QUALIFICATIONS [30 TAC §330.61(b)(2)]** - Not applicable. The proposed facility will not comply with 30 TAC §330.9(b)(3) because it will transfer up to 1,500 tons of waste per day. A permit is being sought for this proposed facility.

Project No. AHF2300405  
 K2 Waste Solutions, LLC Waste Transfer Station – Part II

**SECTION 9: TRANSPORTATION [30 TAC §330.61(i)]**

The following sections provide information regarding roadways within a mile of the facility:

**9.1 AVAILABILITY AND ADEQUACY OF ROADS [30 TAC §330.61(i)(1)]** - The proposed facility will be accessed from FM 1960 which runs parallel and immediately adjacent to the site's northern boundary line. FM 1960 is a two lane paved road with paved shoulders.

**9.2 VOLUME OF VEHICULAR TRAFFIC [30 TAC §330.61(i)(2) and (3)]** - The proposed transfer station will be operated by K2 Waste Solutions, LLC. The primary roadway providing access to the site is FM 1960. This roadway on average serves 10,517 daily users within one mile of the facility. The projected traffic volume over the life of the facility, assuming annual population growth of 1.9% (per the Texas Water Development Board approved Liberty County projections) by year 2045 increases to 15,374 vehicles per day within one mile of the facility. It should be noted that K2 Waste Solutions currently operates a waste hauling facility which is located adjacent to the project site. The proposed transfer station will be incorporated into K2 Waste Solutions' existing commercial operation and the majority of traffic to the facility will generally be limited to their service vehicles. The facility's design will also set aside a small area away from the big truck working area that is designated for public drop-offs of waste. The following sections estimate the amount of vehicular traffic associated with the facility on roadways within a mile of the transfer station at the proposed maximum acceptance rate of 1,500 tons per day.

**9.2.1 VEHICULAR TRAFFIC (K2 WASTE SOLUTIONS VEHICLES ONLY)** - This facility will initially be open only to K2 Waste Solutions vehicles. The following sections provide estimates of the number of vehicles expected to access the facility based on the proposed maximum daily waste acceptance rate of 1,500 tons per day:

**Collection Trucks** - K2 Waste Solutions operates 25-35 waste collection trucks per day. Their capacities vary from 20 cubic yards (7 tons) to 40 cubic yards (12 tons) depending on the truck and waste stream. At the maximum waste acceptance rate of 1,500 tons per day, the number of trips per day would vary from five trips (if only the smaller trucks in service) to two trips (with only the larger trucks in service) per day.

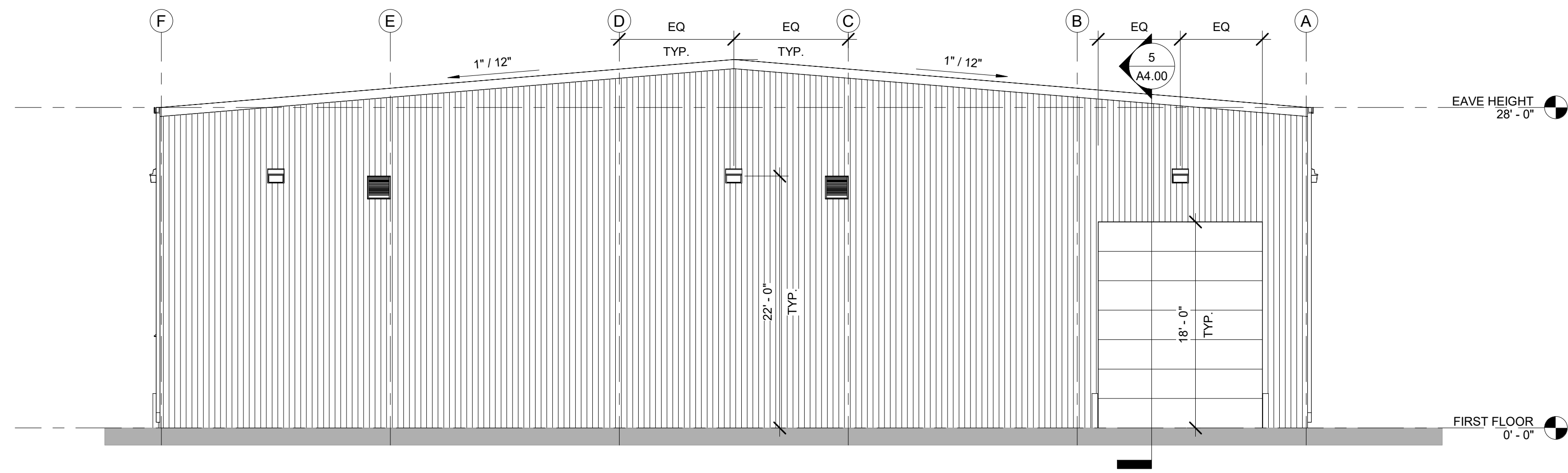
**Transfer Trucks** - The transfer trucks that remove the waste from the transfer station and deliver it to the landfill for final disposal are of the 100 cubic yards (30 ton) transfer trailer variety. At the maximum waste acceptance rate of 1,500 tons per day, approximately 30 trailer loads would need to be transferred.

**Personal Vehicles** - It is assumed that there will be up to seven people working at the facility full-time, either performing duty on-site or driving the collection trucks. Assuming that they all drive personal vehicles to work (no car-pooling) and park them at the facility this would equate to 7 private vehicles accessing the site on a daily basis.

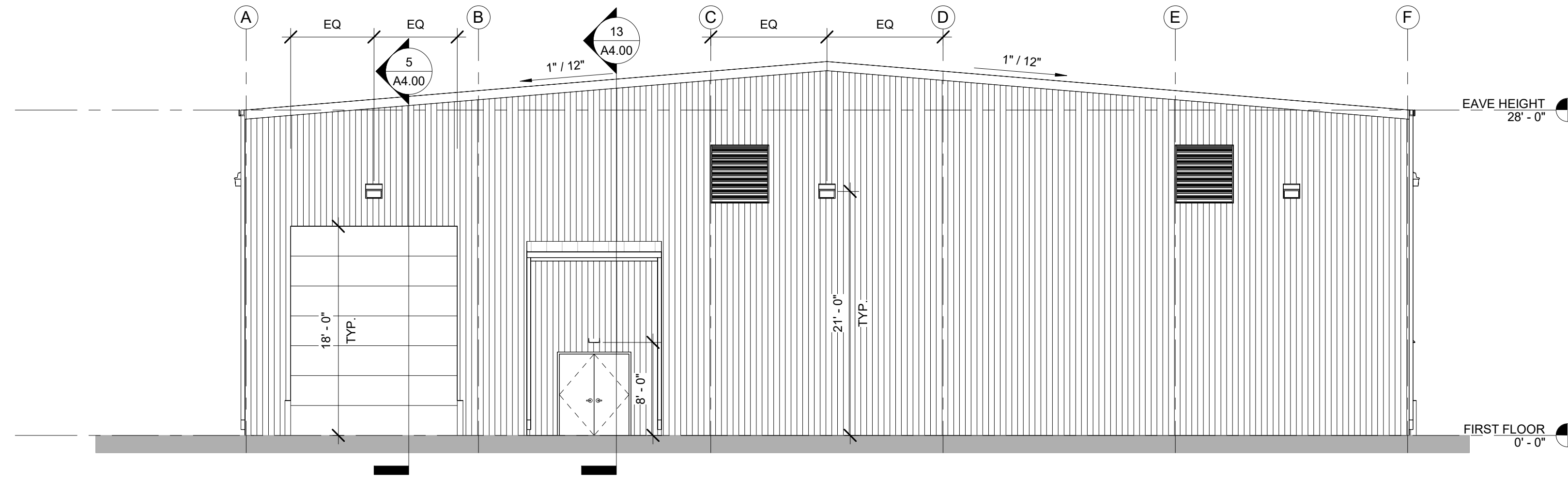
**Total Number of Vehicles** - The following table summarizes the maximum volume of vehicles expected for the facility at the proposed maximum daily waste acceptance rate of 1,500 tons per day:

Estimated Volume of Vehicles (K2 Waste Solutions Vehicles Only)	
Collection Trucks.....	30 vehicles
Transfer Trucks.....	10 vehicles
<u>Personal Vehicles of Facility Staff.....</u>	<u>7 vehicles</u>
<b>Total Number of K2 Waste Solutions Vehicles.....</b>	<b>47 vehicles</b>

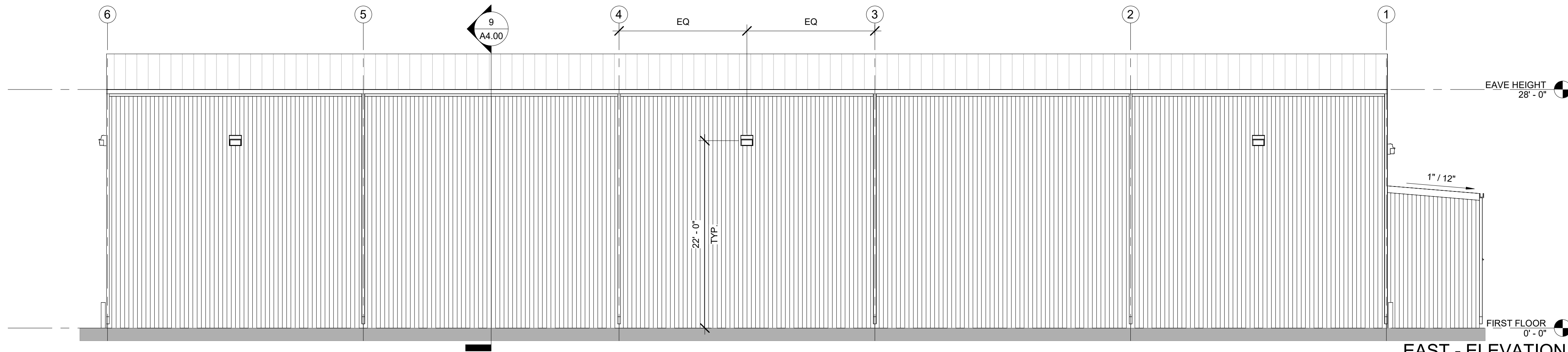




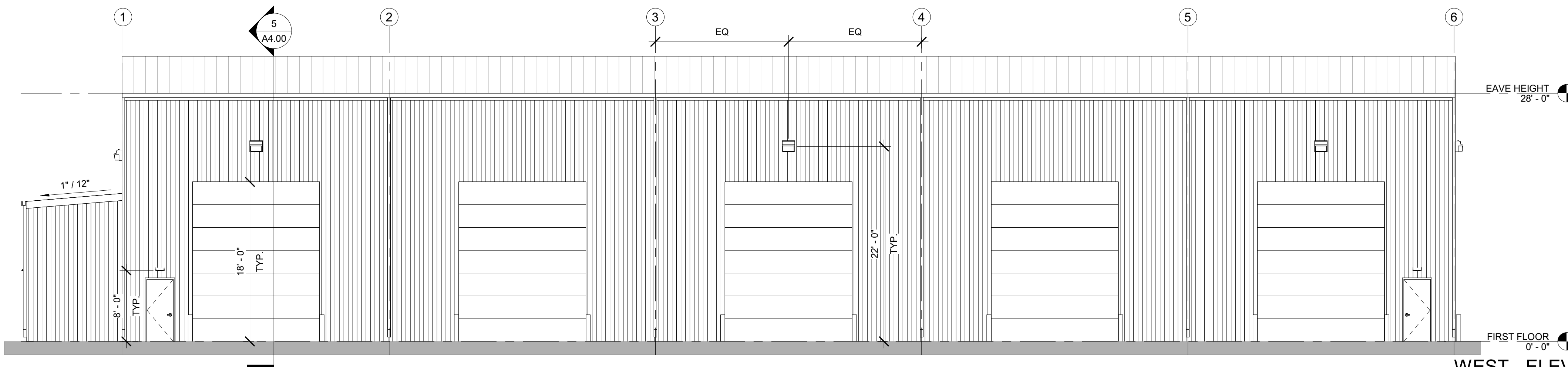
**SOUTH - ELEVATION** 8  
1/8" = 1'-0"



**NORTH - ELEVATION** 7  
1/8" = 1'-0"



**EAST - ELEVATION** 6  
1/8" = 1'-0"



**WEST - ELEVATION** 5  
1/8" = 1'-0"

FIGURE <b>III-D</b>	TRANSFER STATION BUILDING DETAILS	

**GENERAL NOTE:**  
1. REVEALS SHOWN ARE CONTINUOUS INCLUDING SIGNAGE AND EQUIPMENT UNLESS OTHERWISE NOTED.

ELEVATION MATERIAL LEGEND	
	STANDING SEAM ROOF - COLOR TBD
	VERTICAL METAL PANEL - COLOR TBD

**METHOD architecture**  
2920 RIVERBY ROAD, SUITE 200  
HOUSTON, TEXAS 77020  
(713) 842-7500

REVISIONS:  
11/21/24 SCHEMATIC DESIGN  
12/20/24 DESIGN DEVELOPMENT



**12/20/2024**

METHOD ARCHITECTURE, LLC  
1011 W. LEWIS STREET  
CONROE, TX 77301  
281-210-0084 / WWW.RKCI.COM  
THESE DRAWINGS ARE THE PROPERTY OF METHOD ARCHITECTURE, LLC AND MAY NOT BE REPRODUCED, COPIED, OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, WITHOUT THE EXPRESS WRITTEN PERMISSION OF METHOD ARCHITECTURE, LLC.

**FRONTIER WASTE SOLUTIONS**  
TRANSFER STATION

PROJECT:  
M23-01-B0097

SHEET:  
**A3.00**  
BUILDING  
ELEVATIONS

Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station – Part IV

### **Section 5: FACILITY-GENERATED WASTES [30 TAC §330.205]**

All working surfaces that come into contact with solid waste at the K2 Waste Solutions, LLC Waste Transfer Station will be washed down weekly at the completion of processing. However, complying with that requirement will result in wash water being generated at the facility. This wash water is the only liquid waste expected to be generated by this transfer station. It will be managed in accordance with TAC §330.207 (Contaminated Water Management). Refer to Section 6 below for more information.

As noted in Section 4 (above) this facility accepts municipal household, commercial, and industrial Class 2 & 3 solid wastes, along with construction debris generated by residents of Liberty County and surrounding counties or municipalities. The working surfaces at the facility that come into contact with this solid waste will be washed-down at least twice per week and more often if odors or unsightly conditions prevail (please note that hose-down or scrubbing activities are not normally required for the transfer bins because they are washed off-site and come back clean). The wash water generated from washing down the working surfaces is expected to contain some small percentage of waste from washing down the working surfaces but will mostly consist of water. In other words, the exact concentration of waste in the wash water will vary from day to day depending on circumstances and the amount of cleaning necessary but will be a very small percentage of the total volume of wash water generated.

The wash water will be emptied from the proposed holding tank on an as-needed basis by a certified hauler and disposed of at a TCEQ-approved and permitted facility. The certified hauler will have the ability to pump the full volume of the holding tank and oil-sand separator (1,000 gallons each) per trip. The TCEQ-permitted disposal facility(ies) for the disposal of this waste will be selected based on their capacity to receive the waste loads. These facilities may include but are not limited to the City of Dayton Publicly Owned Treatment Works (TCEQ Authorization No. WQ0010564004) or an EPA-registered industrial injection well (EPA ID# TXR000036780) operated by Republic Services at the time of application submittal. Documentation will be kept to demonstrate that all waste leaving the facility is adequately and appropriately managed.

Minimal maintenance may be performed on facility equipment, typically by maintenance vendor(s). Any wastes generated during the maintenance of equipment, such as used oil and other fluids, will be managed and taken off-site for disposal by the vendor(s). If K2 Waste Solutions personnel perform any maintenance, wastes will be managed within the on-site vehicle maintenance facility and properly disposed of. Other than the wash water and these potential equipment maintenance wastes, no other waste will be generated at the facility.

Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station – Part IV

## **SECTION 15: FACILITY OPERATING HOURS [30 TAC §330.229]**

The facility is authorized to accept waste and operate during the time frames indicated in the following sections. In addition to the waste acceptance and operating hours, other non-waste management activities including administrative and maintenance activities may occur twenty-four hours a day seven days a week. Any maintenance activities involving the operation of heavy equipment or the transport of materials on or off-site may only be conducted between the hours of 5:00 am to 9:00 pm, Monday through Saturday. Additional operating hours for operating equipment and transporting materials off-site on Saturday are necessary as the facility will be accepting wastes on Saturday.

**15.1 WASTE ACCEPTANCE HOURS** - The waste acceptance hours for this facility will vary seasonally and are as follows:

- April through September - The facility will accept waste on Monday through Friday from 6 am to 6 pm. The facility will accept waste Saturdays from 7 am to 2 pm. The facility will be closed on Sundays.
- October through March - The facility will accept waste on Monday through Friday from 7 am to 6 pm. The facility will accept waste Saturdays from 7 am to 2 pm. The facility will be closed on Sundays.

Industry standard practices of solid waste collection and transportation beyond the hours of 7 am to 7 pm Monday through Friday are commonplace and routinely approved by TCEQ permitting actions. This facility supports early morning waste collection operations earlier than 7 AM and regular waste collection operations on Saturdays.

When the site is closed the facility supervisor will lock the gate. If the facility supervisor is required to leave the site unattended the gate must be locked in his or her absence.

**15.2 OPERATING HOURS** - Normal hours of operation will be the same as the waste acceptance hours noted above, plus 1 hour before and 2 hours after waste acceptance. If business needs require, activities such as facility maintenance, operation of heavy equipment, and transporting materials on- or off-site may be conducted between the hours of 5:00 am to 9:00 pm, Monday through Saturday.

**15.3 ADDITIONAL TEMPORARY OPERATING HOURS** - In addition, 30 TAC §330.229(c) states that *"the commission's regional offices may allow additional temporary operating hours to address disaster or other emergency situations, or other unforeseen circumstances that could result in the disruption of waste management services in the area."*

When warranted, the facility supervisor will request approval from the commission's regional office to allow additional temporary operating hours to address disaster or other emergency situations, or other unforeseen circumstances (such as traffic delays or adverse weather) that could result in the disruption of waste management services in the area. The facility supervisor will document the reason or reasons for the delay for each day on which a delay occurs and place the documentation in the operating record. This documentation will include the dates, times, and duration when any alternative operating hours are utilized.

**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: Bill Killian Title: Vice President

Email Address: [REDACTED]

Signature: [Handwritten Signature] Date: 1-10-25

**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 Bill Killian

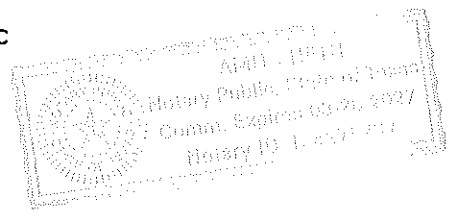
On this 10 day of January 2025

My commission expires on the 26 day of March, 2027

[Handwritten Signature]  
\_\_\_\_\_  
Notary Public in and for

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

Note: Application Must Bear Signature & Seal of Notary Public



Application Revisions  
Redline/Strikeout Format

**K2 WASTE SOLUTIONS, LLC  
WASTE TRANSFER STATION  
MSW PERMIT No. 2394A**

**MAJOR PERMIT AMENDMENT  
PART II**

PREPARED BY:



**RABA KISTNER, INC.**  
19111 NORTH DALLAS PARKWAY, SUITE 310  
DALLAS, TX 75287

**RKI PROJECT NO. AHF2300405**

**JULY 2024**  
**REV. [JAN. 2025](#)**



A handwritten signature in black ink, appearing to read 'H. M. Barrett', written in a cursive style.

January 13, 2025

Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station

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K2 Waste Solutions, LLC Waste Transfer Station

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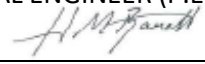
Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station

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PROFESSIONAL ENGINEER (P.E.) CERTIFICATION:

SIGNATURE: 

NAME: Howard M. Barrett, PE

COMPANY: Raba Kistner, Inc.

TITLE: Vice President / Principal Engineer, PE

DATE: January 13, 2025

PE Registration Number  
Texas No. 126292



**K2 WASTE SOLUTIONS, LLC  
WASTE TRANSFER STATION  
MSW PERMIT No. 2394A**

**MAJOR PERMIT AMENDMENT  
PART III**

PREPARED BY:



**RABA KISTNER, INC.**  
19111 NORTH DALLAS PARKWAY, SUITE 310  
DALLAS, TX 75287

**RKI PROJECT NO. AHF2300405**

**JULY 2024  
REV. JAN. 2025**



A handwritten signature in black ink that reads 'H. M. Barrett'.

January 13, 2025

Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station

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PROFESSIONAL ENGINEER (P.E.) CERTIFICATION:

SIGNATURE: 

NAME: Howard M. Barrett, PE

COMPANY: Raba Kistner, Inc.

TITLE: Vice President / Principal Engineer, PE

DATE: January 13, 2025

PE Registration Number

Texas No. 126292



**K2 WASTE SOLUTIONS, LLC.  
WASTE TRANSFER STATION  
MSW PERMIT No. 2394A**

**MAJOR PERMIT AMENDMENT  
PART IV**

PREPARED BY:



**RABA KISTNER, INC.**  
19111 NORTH DALLAS PARKWAY, SUITE 310  
DALLAS, TX 75287

**RKI PROJECT NO. AHF2300405**

**JULY 2024**  
**REV. JAN. 2025**



A handwritten signature in black ink that reads 'H. M. Barrett'.

January 13, 2025

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K2 Waste Solutions, LLC Waste Transfer Station

PROFESSIONAL ENGINEER (P.E.) CERTIFICATION:

SIGNATURE: 

NAME: Howard M. Barrett, PE

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Maximum Amount of Solid Waste to be Stored at the Facility - It is proposed that the facility be permitted for a maximum 72-hour storage volume of 900 tons of municipal solid waste. Each transfer trailer will be filled and dispatched to a TCEQ-approved landfill as rapidly as possible. Under normal operating conditions, solid waste should be hauled to the landfill at least once per day. In no event will the solid waste be stored at the transfer station longer than 72 hours. The average length of time that solid waste will be stored onsite is 24-48 hours.

To address any logistical concerns the maximum daily rate exceeding the 72-hour holding volume amount, K2 Waste Solutions has full control of the incoming waste volume accepted into the facility. K2 Waste Solutions will track incoming volume throughout the day, every day, and will also track outgoing volume daily. The facility operator is a waste collection and transportation company, and should overnight storage be necessary, they have the ability to control incoming waste volumes and divert incoming loads directly to a landfill for direct disposal, in order to maintain a maximum overnight storage capacity of 900 tons within the building.

Based on building dimensions of 150' x 100', calculations were completed to demonstrate the feasibility of storing up to 900 tons overnight. Floor space dedicated to the following operations was excluded from the calculations:

- 150' x 30' passage on the east side of the building for trailer and route truck loading/unloading as well as loader movement for waste placement;
- 60' x 30' passage for equipment access on the south side of the building; and
- 150' x 10' buffer space along the west side of the building.

An approximately 120' x 60' space remains for waste storage. Waste will be stored up to a height of 12' with side slopes of 0.5:1. Based on this information, the volume of waste storage has been calculated to be at least 2,736 cubic yards, or 912 tons.

Intended Destination of Solid Waste Received at this Facility - All waste collected at the facility will be loaded onto transport trucks and driven to a TCEQ-approved landfill or otherwise authorized facility for disposal. K2 Waste Solutions, LLC desires to transport their waste eastward away from the traffic and population centers of the Houston/Humble area to allow for easier transport. The closest facility which may accept waste is the WM - Atascocita Recycling and Disposal Facility (MSW Authorization No. 1307D). However, there are several TCEQ-approved landfills located to the east, northeast, and southeast of the proposed transfer station which waste may also be transported to. Segregated and/or sorted recyclables including cardboard and metals may be staged within the Transfer Station and will be transported to recycling facilities including but not limited to the Atascocita Recycling and Disposal Facility, or other duly authorized facility in the greater Houston Metropolitan Area.

**2.1.3 MAXIMUM ANNUAL WASTE ACCEPTANCE RATE FOR PROPOSED LANDFILLS[30 TAC §330.61(b)(1)(C)]** - Not applicable for this facility. This requirement pertains to landfills, not transfer stations.

**2.2 REGISTRATION QUALIFICATIONS [30 TAC §330.61(b)(2)]** - Not applicable. The proposed facility will not comply with 30 TAC §330.9(b)(3) because it will transfer up to 1,500 tons of waste per day. A permit is being sought for this proposed facility.

Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station – Part II

**SECTION 9: TRANSPORTATION [30 TAC §330.61(i)]**

The following sections provide information regarding roadways within a mile of the facility:

**9.1 AVAILABILITY AND ADEQUACY OF ROADS [30 TAC §330.61(i)(1)]** - The proposed facility will be accessed from FM 1960 which runs parallel and immediately adjacent to the site's northern boundary line. FM 1960 is a two lane paved road with paved shoulders.

**9.2 VOLUME OF VEHICULAR TRAFFIC [30 TAC §330.61(i)(2) and (3)]** - The proposed transfer station will be operated by K2 Waste Solutions, LLC. The primary roadway providing access to the site is FM 1960. This roadway on average serves 10,517 daily users within one mile of the facility. The projected traffic volume over the life of the facility, assuming annual population growth of 1.9% (per the Texas Water Development Board approved Liberty County projections) by year 2045 increases to 15,374 vehicles per day within one mile of the facility. It should be noted that K2 Waste Solutions currently operates a waste hauling facility which is located adjacent to the project site. The proposed transfer station will be incorporated into K2 Waste Solutions' existing commercial operation and the majority of traffic to the facility will generally be limited to their service vehicles. The facility's design will also set aside a small area away from the big truck working area that is designated for public drop-offs of waste. The following sections estimate the amount of vehicular traffic associated with the facility on roadways within a mile of the transfer station at the proposed maximum acceptance rate of 1,500 tons per day.

**9.2.1 VEHICULAR TRAFFIC (K2 WASTE SOLUTIONS VEHICLES ONLY)** - This facility will initially be open only to K2 Waste Solutions vehicles. The following sections provide estimates of the number of vehicles expected to access the facility based on the proposed maximum daily waste acceptance rate of 1,500 tons per day:

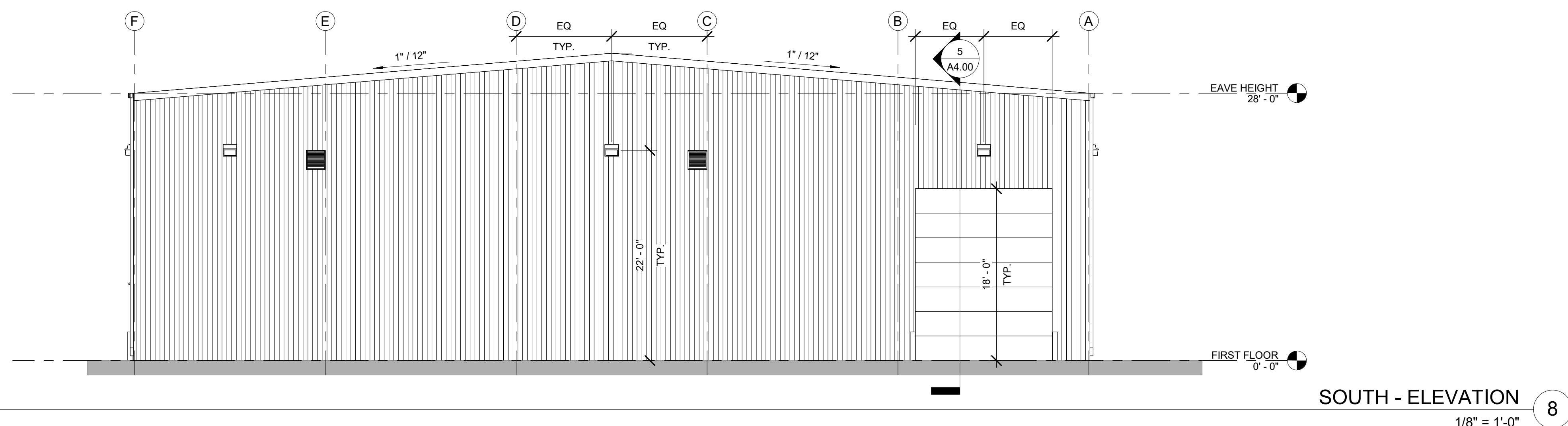
**Collection Trucks** - K2 Waste Solutions operates 25-35 waste collection trucks per day. Their capacities vary from 20 cubic yards (7 tons) to 40 cubic yards (12 tons) depending on the truck and waste stream. At the maximum waste acceptance rate of 1,500 tons per day, the number of trips per day would vary from five trips (if only the smaller trucks in service) to two trips (with only the larger trucks in service) per day.

**Transfer Trucks** - The transfer trucks that remove the waste from the transfer station and deliver it to the landfill for final disposal are of the 100 cubic yards (30 ton) transfer trailer variety. At the maximum waste acceptance rate of 1,500 tons per day, approximately 30 trailer loads would need to be transferred.

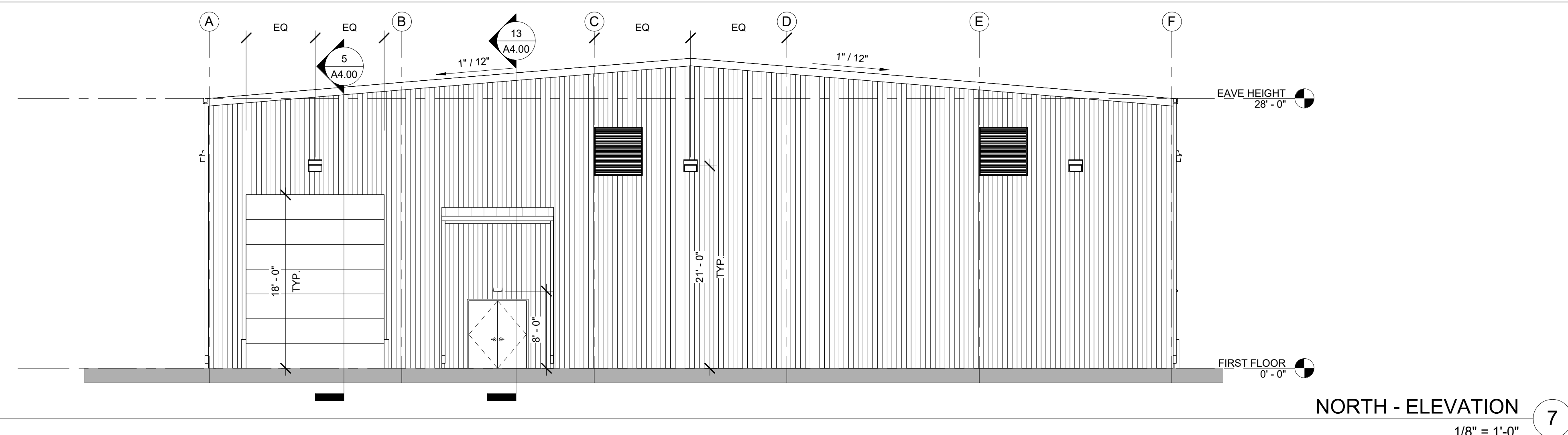
**Personal Vehicles** - It is assumed that there will be up to seven people working at the facility full-time, either performing duty on-site or driving the collection trucks. Assuming that they all drive personal vehicles to work (no car-pooling) and park them at the facility this would equate to 7 private vehicles accessing the site on a daily basis.

**Total Number of Vehicles** - The following table summarizes the maximum volume of vehicles expected for the facility at the proposed maximum daily waste acceptance rate of 1,500 tons per day:

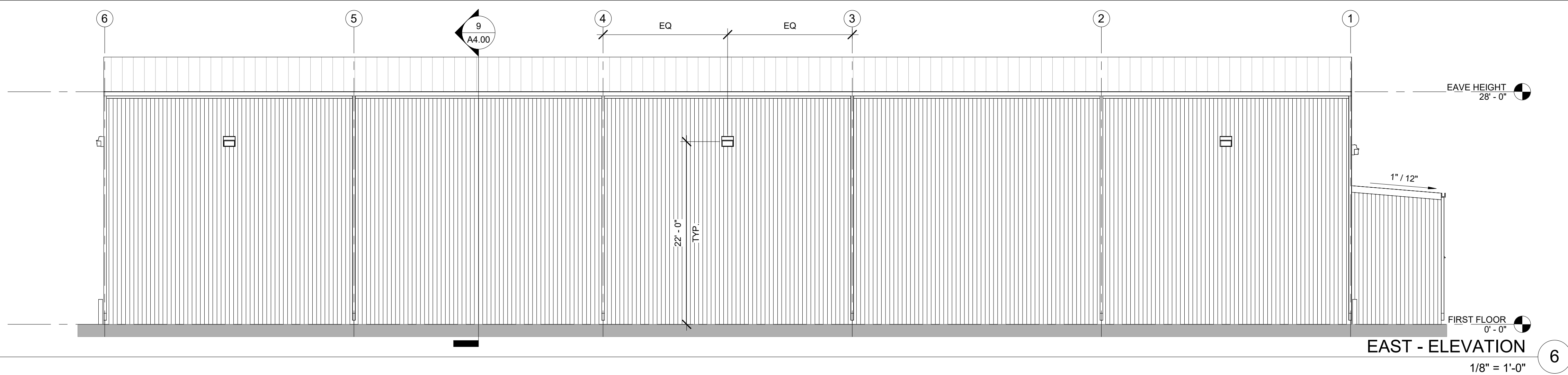
Estimated Volume of Vehicles (K2 Waste Solutions Vehicles Only)	
Collection Trucks.....	30 vehicles
Transfer Trucks .....	10 vehicles
<u>Personal Vehicles of Facility Staff</u> .....	<u>7 vehicles</u>
<b>Total Number of K2 Waste Solutions Vehicles</b> .....	<b>47 vehicles</b>



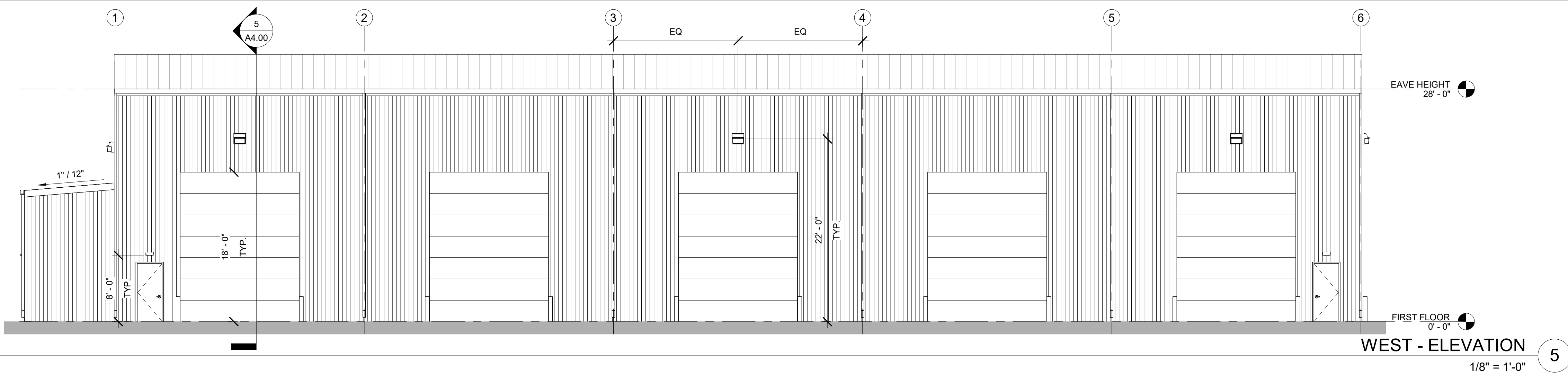
**SOUTH - ELEVATION** 8  
1/8" = 1'-0"



**NORTH - ELEVATION** 7  
1/8" = 1'-0"

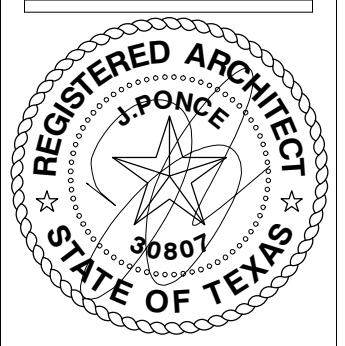


**EAST - ELEVATION** 6  
1/8" = 1'-0"



**WEST - ELEVATION** 5  
1/8" = 1'-0"

REVISIONS:  
11/21/24 SCHEMATIC DESIGN  
12/20/24 DESIGN DEVELOPMENT



**12/20/2024**

METHOD ARCHITECTURE, LLC  
11111 RIVERBY ROAD, SUITE 200  
HOUSTON, TEXAS 77020  
THESE DRAWINGS ARE THE PROPERTY OF METHOD ARCHITECTURE, LLC AND MAY NOT BE REPRODUCED, COPIED, OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, WITHOUT THE WRITTEN PERMISSION OF METHOD ARCHITECTURE, LLC.

FIGURE <b>III-D</b>	<b>TRANSFER STATION BUILDING DETAILS</b>	 1011 W. Lewis Street Conroe, TX 77301 281-210-0084 / WWW.RKCI.COM
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**GENERAL NOTE:**  
1. REVEALS SHOWN ARE CONTINUOUS INCLUDING SIGNAGE AND EQUIPMENT UNLESS OTHERWISE NOTED.

ELEVATION MATERIAL LEGEND	
	STANDING SEAM ROOF - COLOR TBD
	VERTICAL METAL PANEL - COLOR TBD

**FRONTIER WASTE SOLUTIONS**  
TRANSFER STATION  
10185 FM 1960,  
OLD RIVER-WINFREE, TX 77535

PROJECT:  
M23-01-B0097

SHEET:  
**A3.00**  
BUILDING  
ELEVATIONS

Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station – Part IV

### **Section 5: FACILITY-GENERATED WASTES [30 TAC §330.205]**

All working surfaces that come into contact with solid waste at the K2 Waste Solutions, LLC Waste Transfer Station will be washed down weekly at the completion of processing. However, complying with that requirement will result in wash water being generated at the facility. This wash water is the only liquid waste expected to be generated by this transfer station. It will be managed in accordance with TAC §330.207 (Contaminated Water Management). Refer to Section 6 below for more information.

As noted in Section 4 (above) this facility accepts municipal household, commercial, and industrial Class 2 & 3 solid wastes, along with construction debris generated by residents of Liberty County and surrounding counties or municipalities. The working surfaces at the facility that come into contact with this solid waste will be washed-down at least twice per week and more often if odors or unsightly conditions prevail (please note that hose-down or scrubbing activities are not normally required for the transfer bins because they are washed off-site and come back clean). The wash water generated from washing down the working surfaces is expected to contain some small percentage of waste from washing down the working surfaces but will mostly consist of water. In other words, the exact concentration of waste in the wash water will vary from day to day depending on circumstances and the amount of cleaning necessary but will be a very small percentage of the total volume of wash water generated.

The wash water will be emptied from the proposed holding tank on an as-needed basis by a certified hauler and disposed of at a TCEQ-approved and permitted facility. The certified hauler will have the ability to pump the full volume of the holding tank and oil-sand separator (1,000 gallons each) per trip. The TCEQ-permitted disposal facility(ies) for the disposal of this waste will be selected based on their capacity to receive the waste loads. These facilities may include but are not limited to the City of Dayton Publicly Owned Treatment Works (TCEQ Authorization No. WQ0010564004) or an EPA-registered industrial injection well (EPA ID# TXR000036780) operated by Republic Services at the time of application submittal. Documentation will be kept to demonstrate that all waste leaving the facility is adequately and appropriately managed.

Minimal maintenance may be performed on facility equipment, typically by maintenance vendor(s). Any wastes generated during the maintenance of equipment, such as used oil and other fluids, will be managed and taken off-site for disposal by the vendor(s). If K2 Waste Solutions personnel perform any maintenance, wastes will be managed within the on-site vehicle maintenance facility and properly disposed of. Other than the wash water and these potential equipment maintenance wastes, no other waste will be generated at the facility.

Project No. AHF2300405  
K2 Waste Solutions, LLC Waste Transfer Station – Part IV

## **SECTION 15: FACILITY OPERATING HOURS [30 TAC §330.229]**

The facility is authorized to accept waste and operate during the time frames indicated in the following sections. In addition to the waste acceptance and operating hours, other non-waste management activities including administrative and maintenance activities may occur twenty-four hours a day seven days a week. Any maintenance activities involving the operation of heavy equipment or the transport of materials on or off-site may only be conducted between the hours of 5:00 am to 9:00 pm, Monday through Saturday. Additional operating hours for operating equipment and transporting materials off-site on Saturday are necessary as the facility will be accepting wastes on Saturday.

**15.1 WASTE ACCEPTANCE HOURS** - The waste acceptance hours for this facility will vary seasonally and are as follows:

- April through September - The facility will accept waste on Monday through Friday from 6 am to 6 pm. The facility will accept waste Saturdays from 7 am to 2 pm. The facility will be closed on Sundays.
- October through March - The facility will accept waste on Monday through Friday from 7 am to 6 pm. The facility will accept waste Saturdays from 7 am to 2 pm. The facility will be closed on Sundays.

Industry standard practices of solid waste collection and transportation beyond the hours of 7 am to 7 pm Monday through Friday are commonplace and routinely approved by TCEQ permitting actions. This facility supports early morning waste collection operations earlier than 7 AM and regular waste collection operations on Saturdays.

When the site is closed the facility supervisor will lock the gate. If the facility supervisor is required to leave the site unattended the gate must be locked in his or her absence.

**15.2 OPERATING HOURS** - Normal hours of operation will be the same as the waste acceptance hours noted above, plus 1 hour before and 2 hours after waste acceptance. If business needs require, activities such as facility maintenance, operation of heavy equipment, and transporting materials on- or off-site may be conducted between the hours of 5:00 am to 9:00 pm, Monday through Saturday.

**15.3 ADDITIONAL TEMPORARY OPERATING HOURS** - In addition, 30 TAC §330.229(c) states that *"the commission's regional offices may allow additional temporary operating hours to address disaster or other emergency situations, or other unforeseen circumstances that could result in the disruption of waste management services in the area."*

When warranted, the facility supervisor will request approval from the commission's regional office to allow additional temporary operating hours to address disaster or other emergency situations, or other unforeseen circumstances (such as traffic delays or adverse weather) that could result in the disruption of waste management services in the area. The facility supervisor will document the reason or reasons for the delay for each day on which a delay occurs and place the documentation in the operating record. This documentation will include the dates, times, and duration when any alternative operating hours are utilized.