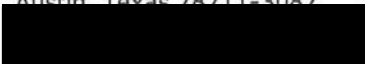


October 31, 2025

Frank Zeng
Project Manager
Municipal Solid Waste Permits – MC 124
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087


Re: Response to Notice of Deficiency
Karlis Ercums, IV – Spring Branch Transfer Station - Comal County
Municipal Solid Waste (MSW) - Permit No. 2419
RN111746988; CN605838861; Tracking No. 31804401

Dear Mr. Zeng:

The following items are provided in response to your Notice of Deficiency letter dated September 16, 2025. For ease of reading, they are addressed in the same numerical order as provided in your letter. Each of your comments is listed in the table below (in bold) followed by the response. The location of each revision is also referenced by part, section, and page number:

NOD ID	Location	Description
1	Part I, Form TCEQ-20650	The proposed changes to the site layout plan are significant enough to require a modification with public notice under 305.70(I). Resubmit form TCEQ-20650 with the required information and attachments for a modification with public notice. More information can be found in the instructions for form TCEQ-20650. When resubmitting, please address the technical deficiencies 2-6. Please see the revised Form TCEQ-20650 in Part I.



NOD ID	Location	Description
2	Part III, Section 1.2.8 (Pg 4-5) Part IV, Section 20 (Pg 27)	As illustrated by comparisons between Figure 2 (the currently approved conditions) and Figure 3 (the proposed conditions) of Attachment III-C (Facility Layout), this application proposes moving the waste management area (transfer station building and trailer parking area) by about 470 feet in the southeast direction. Revise the application to include operational and physical measures to minimize visual impacts and noise pollution according to §330.239 or describe how the current operational and physical measures are sufficient for the new site layout. The previously approved measures to abate visual impacts and noise pollution including fencing/screening, orientation of the transfer building to face the interior of the property, and 50' buffer zone minimum distances have not changed and still apply to the new transfer station layout.
3	Part IV, Section 23, and Section 23.1-23.4 (Pg 30-32)	Revise the application to provide measures for compliance with §330.245 related to air emission and odors or describe how the current measures are sufficient for the new site layout. The previously approved measures for air emission and odor abatement have not changed and still apply with the new transfer station layout. A copy of the measures were provided in the initial submittal and an additional copy is included with this response letter.
4	Part II Attachment C Part III, Section 1.2.2 (Pg 2), Section 1.2.3 (Pg 3), and Attachment C Part IV, Section 4.4 (Pg 8), Section 22 (Pg 29), and Attachment C	It is noted that some changes made in this application are not reflected in all relevant portions of the permit application. One example is that the application proposes to have five entrances while the currently approved design has three entrances; revise Building Layout 1 figure of Attachment III-C to show the five entrances (note that in making this comment, entrance is assumed to be the same as door used in the current permit document; revise to clarify entrance vs door as necessary). Another example of the unspecified changes is that the transfer station building layout and waste movement directions are changed under this modification application, but the Building Layout sheets are not revised. Revise these building layout sheets in Attachment III-C to reflect these changes. It is suggested to include a List of Figures to Attachment III-C. The application has been revised accordingly to match the updated design of the facility. The building layout sheets have been revised accordingly. The waste movement directions have been updated as well.



NOD ID	Location	Description
5	Part I Part II Part III Part IV	When revising the application, ensure that all impacted portions of the current permit documents (Parts I through IV) are revised (for example, the portions related to the deficiencies discussed in Comment 2 of this email). Also ensure redline/strikeout versions are provided to highlight the revisions/changes. The application has been revised accordingly. In addition, redline/strikeout versions are provided highlighting the revisions/changes.
6	Part I, TCEQ Form 20650	Revise the Description of the Revisions to the Facility (contained in this application behind the application form) to list and briefly discuss all revisions/changes. If a piece of information is not changed nor affected, you do not need to include it in the permit modification application (for example, but not limited to, Attachment 4 Property Legal Description in Part II. Another example is Attachment 5 Evidence of Competency). The "Description of the Revisions to the Facility" has been revised accordingly.
7	Part I, Supplemental Technical Report, Section 4 (Pg 4) Part II, Section 11.2, Section 11.2.1-11.2.2, and Section 11.3 (Pg 27-28) Part III, Section 2 and Section 2.1-2.2 (Pg 8-9)	Review the current permit conditions to ensure that the facility will still comply with the surface water drainage requirements and Edwards Aquifer permit conditions. Revise the application as necessary. The previously approved measures to comply with the surface water drainage requirements have not changed and still apply to the new transfer station layout. In addition, TX2 Engineering has acquired the necessary Edwards Aquifer Permit and site plan revisions have been communicated to TX2 Engineering.

An itemized list of the attachments that accompany this letter is provided below:

- A. FORMS – Form TCEQ-20714 has been completed and attached herewith. It references Tracking No. 31804401.
- B. PART I – The following items are attached herewith to be replaced in Part I of the Application
 - Revised Cover and Table of Contents for Part I.
 - Revised Part I form (Form TCEQ-00650). The certification signature page has been signed and notarized by the applicant.
 - Revised Supplementary Technical Report Pg 4.
- C. PART II – The following attachments are provided for replacement in Part II of the application:
 - Revised Cover and Table of Contents for Part II.
 - Revised Pages II-27 through II-28,
 - Revised Attachment II-C, including: Proposed Conditions, Grading Plan, Building Layout, and Building Sections.
- D. Part III – The following attachments are provided for replacement in Part III of the application:



- Revised Cover and Table of Contents for Part III.
- Revised Pages III-2 through III-5; and revised Pages III-8 through III-9.
- Revised Attachment III-C, including: Proposed Conditions, Grading Plan, Building Layout, and Building Sections.

E. PART IV – The following attachments are provided for replacement in Part IV of the application:

- Revised Cover and Table of Contents for Part IV.
- Revised Page IV-8; revised Page IV-27; revised Pages IV-29 through IV-32.

One (1) paper original, one (1) paper duplicate, and an electronic duplicate of the revisions are attached in this submittal. In addition, a redline/strikeout copy has also been included with the paper original, paper duplicate, and electronic duplicate that identifies all modifications from the previous submittal. These items have been three-hole punched to allow for replacement in the applications binders. Please note that one (1) un-marked copy and one (1) redline/strikeout copy of the above items have also been sent directly to the TCEQ Region 13 Office to the attention of the Waste Section Manager, 14250 Judson Road, San Antonio, TX 78233-4480.

If you have any questions, please feel free to call me at (936) 634-5528 or email me at [REDACTED]

Sincerely,
EGA Consultants, LLC



Eddie Aguilar, P.E.



CERTIFICATION

Permit/Registration No. MSW-2419

Applicant: Hill Country Waste Solutions, LLC

I, Karlis Ercums, IV President
Typed or printed name *Title*

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.

I further certify that I am authorized under 30 Texas Administrative Code §305.44 to sign this document and can provide documentation in proof of such authorization upon request.

Signature: Karlis Ercums, IV Date: 10-31-25



Texas Commission on Environmental Quality

Waste Permits Division Correspondence

Cover Sheet

Date: October 2025

Facility Name: Spring Branch Transfer Station

Permit or Registration No.: MSW 2419

Nature of Correspondence:

☐ Initial/New

☒ Response/Revision to TCEQ Tracking No.:
31804401 (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
☐ New Notice of Intent	☐ Alternative Daily Cover Report
☐ Notice of Intent Revision	☐ Closure Report
☐ New Permit (Including Subchapter T)	☐ Compost Report
☐ New Registration (Including Subchapter T)	☐ Groundwater Alternate Source Demonstration
☐ Major Amendment	☐ Groundwater Corrective Action
☐ Minor Amendment	☐ Groundwater Monitoring Report
☐ Limited Scope Major Amendment	☐ Groundwater Background Evaluation
☒ Notice Modification	☐ Landfill Gas Corrective Action
☐ Non-Notice Modification	☐ Landfill Gas Monitoring
☐ Transfer/Name Change Modification	☐ Liner Evaluation Report
☐ Temporary Authorization	☐ Soil Boring Plan
☐ Voluntary Revocation	☐ Special Waste Request
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Other:
☐ Other:	

Table 2 - Industrial & Hazardous Waste Correspondence

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



Texas Commission on Environmental Quality

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

Application Tracking Information

Facility Name: Spring Branch Transer Station
Permittee or Registrant Name: Hill Country Waste Solutions LLC
MSW Authorization Number: 2419
Initial Submission Date: May 2025
Revision Date: October 2025

Instructions for completing this form are provided in [form TCEQ-20650-instr¹](#). If you have questions, contact the Municipal Solid Waste Permits Section by email to mswper@tceq.texas.gov, or by phone at 512-239-2335.

Application Data

1. Submission Type

☐ Initial Submission ☒ Notice of Deficiency (NOD) Response

2. Authorization Type

☒ Permit ☐ Registration

3. Application Type

☒ Modification with Public Notice ☐ Modification without Public Notice
☐ Temporary Authorization (TA) ☐ Modification for Name Change or Transfer

4. Application Fee

Amount

The application fee for a modification or temporary authorization is \$150.

Payment Method

☒ Check
☐ Online through ePay portal www3.tceq.texas.gov/epay/

If paid online, enter ePay Trace Number: _____

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

5. Electronic Versions of Application

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

6. Party Responsible for Mailing Notice

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

☒ Applicant

☐ Agent in Service

☐ Consultant

Contact Name: Karlis Ercums, IV

Title: President

Email Address: [REDACTED]

7. Confidential Documents

Does the application contain confidential documents?

☐ Yes ☒ No

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

8. Facility General Information

Facility Name: Spring Branch Transer Station

Contact Name: Karlis Ercums, IV

Title: President

MSW Authorization Number (if existing): 2419

Regulated Entity Reference Number: **RN** 111746988

Physical or Street Address: 11301 US 281 N

City: Spring Branch

County: Comal

State: TX Zip Code: 78070

Phone Number: (830) 885-5512

Latitude (Decimal Degrees): 29.898375°

Longitude (Decimal Degrees): 98.412333°

9. Facility Types

☐ Type I

☐ Type IV

☒ Type V

☐ Type IAE

☐ Type IVAE

☐ Type VI

10. Description of the Revisions to the Facility

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

Please see attached "TCEQ-20650 No. 10 Description of the Revisions to the Facility" for a description of the revisions.

11. Facility Contact Information

Site Operator (Permittee or Registrant)

Name: Hill Country Waste Solutions LLC

Customer Reference Number: **CN** 605838861

Contact Name: Karlis Ercums, IV

Title: President

Mailing Address: P.O. Box 960

City: Spring Branch

County: Comal

State: TX

Zip Code: 78070

Phone Number: (830) 885-5512

Email Address: [REDACTED]

Texas Secretary of State (SOS) Filing Number: 802594691

Operator (if different from Site Operator)

Name: N/A

Customer Reference Number: **CN** N/A

Contact Name: N/A

Title: N/A

Mailing Address: N/A

City: N/A

County: N/A

State: N/A

Zip Code: N/A

Phone Number: N/A

Email Address: N/A

Texas Secretary of State (SOS) Filing Number: N/A

Consultant (if applicable)

Firm Name: EGA Consultants, LLC.
Consultant Name: Eddie Aguilar, P.E.
Texas Board of Professional Engineers Firm Registration Number: F-1156
Contact Name: Eddie Aguilar, P.E. Title: Project Manager
Mailing Address: 408 North Third Street
City: Lufkin County: Angelina State: TX Zip Code: 75902
Phone Number: (936) 634-5528
Email Address: [REDACTED]

Agent in Service (required for out-of-state applicants)

Name: N/A
Mailing Address: N/A
City: N/A County: N/A State: TX Zip Code: N/A
Phone Number: N/A
Email Address: N/A

12. Ownership Status of the Facility

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

☐ Yes ☒ No

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

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

☐ Yes ☒ No

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

Owner Name: Spring Branch Partners LLC
Mailing Address: P.O. Box 960
City: Spring Branch County: Comal State: TX Zip Code: 78070
Phone Number: (830) 885-5512
Email Address: N/A

Signature Page

Site Operator or Authorized Signatory

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

Name: Karlis Ercums, IV Title: President
Email Address: [REDACTED]
Signature: [Signature] Date: 10-31-25

Operator or Principal Executive Officer Designation of Authorized Signatory

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

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

Operator or Principal Executive Officer Name: _____
Email Address: _____
Signature: _____ Date: _____

Notary

SUBSCRIBED AND SWORN to before me by the said Karlis Ercums IV

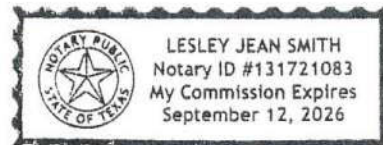
On this 31 day of October, 2025

My commission expires on the 12 day of Sept, 2026

[Signature]

Notary Public in and for

Comal County, Texas



Note: Application Must Bear Signature and Seal of Notary Public

Attachments for Permit or Registration Modification with Public Notice

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

Attachments Table 1. Required attachments.

Required Attachments	Attachment Number
Land Ownership Map	3
Landowners List	4
Marked (Redline/Strikeout) Pages	2
Unmarked Revised Pages	1

Attachments Table 2. Additional attachments as applicable.

Additional Attachments as Applicable (select all that apply and add others as needed)	Attachment Number
☒ TCEQ Core Data Form(s)	5
☒ Signatory Authority Delegation	7
☒ Fee Payment Receipt	6
☒ Confidential Documents	8

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

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

Attachments Table 3. Required attachments for modifications.

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

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

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

Attachments for Permit or Registration Name Change or Transfer Modification

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

Attachments Table 5. Required attachments.

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

Attachments Table 6. Additional attachments as applicable.

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

TCEQ-20650 No. 10 Description of the Revisions to the Facility

The following modifications to the permit for this facility have been made based on comments received from TCEQ:

1. The proposed changes to the site layout plan are significant enough to require a modification with public notice under 305.70(l). Resubmit form TCEQ-20650 with the required information and attachments for a modification with public notice. More information can be found in the [instructions for form TCEQ-20650](#). When resubmitting, please address the technical deficiencies 2-6.

Answer) TCEQ-Form 20650 has been revised to adhere to an application revision with public notice.

2. As illustrated by comparisons between Figure 2 (the currently approved conditions) and Figure 3 (the proposed conditions) of Attachment III-C (Facility Layout), this application proposes moving the waste management area (transfer station building and trailer parking area) by about 470 feet in the southeast direction. Revise the application to include operational and physical measures to minimize visual impacts and noise pollution according to §330.239 or describe how the current operational and physical measures are sufficient for the new site layout.

Answer) The previously approved measures to abate visual impacts and noise pollution including fencing/screening, orientation of the transfer building to face the interior of the property, and 50' buffer zone minimum distances have not changed and still apply to the new transfer station layout.

3. Revise the application to provide measures for compliance with §330.245 related to air emission and odors or describe how the current measures are sufficient for the new site layout.

Answer) The previously approved measures for air emission and odor abatement have not changed and still apply with the new transfer station layout.

4. It is noted that some changes made in this application are not reflected in all relevant portions of the permit application. One example is that the application proposes to have five entrances while the currently approved design has three entrances; revise Building Layout 1 figure of Attachment III-C to show the five entrances (note that in making this comment, entrance is assumed to be the same as door used in the current permit document; revise to clarify entrance vs door as necessary). Another example of the unspecified changes is that the transfer station building layout and waste movement directions are changed under this modification application, but the Building Layout sheets

are not revised. Revise these building layout sheets in Attachment III-C to reflect these changes. It is suggested to include a List of Figures to Attachment III-C.

Answer) The application has been revised accordingly to match the updated design of the facility. The building layout sheets have been revised accordingly. The waste movement directions have been updated as well.

5. When revising the application, ensure that all impacted portions of the current permit documents (Parts I through IV) are revised (for example, the portions related to the deficiencies discussed in Comment 2 of this email). Also ensure redline/strikeout versions are provided to highlight the revisions/changes.

Answer) The application has been revised accordingly. In addition, redline/strikeout versions are provided highlighting the revisions/changes.

6. Revise the Description of the Revisions to the Facility (contained in this application behind the application form) to list and briefly discuss all revisions/changes. If a piece of information is not changed nor affected, you do not need to include it in the permit modification application (for example, but not limited to, Attachment 4 Property Legal Description in Part II. Another example is Attachment 5 Evidence of Competency).

Answer) The "Description of the Revisions to the Facility" has been revised accordingly.

7. Review the current permit conditions to ensure that the facility will still comply with the surface water drainage requirements and Edwards Aquifer permit conditions. Revise the application as necessary.

Answer) The previously approved measures to comply with the surface water drainage requirements have not changed and still apply to the new transfer station layout. In addition, TX2 Engineering has acquired the necessary Edwards Aquifer Permit and site plan revisions have been communicated to TX2 Engineering.

SPRING BRANCH TRANSFER STATION

**MSW PERMIT No. 2419
HILL COUNTRY WASTE SOLUTIONS LLC (OPERATOR)
SPRING BRANCH, COMAL COUNTY, TEXAS**

PART I

**MAY, 2023
(REVISED JUNE, 2023)
(REVISED AUGUST, 2023)
(REVISED OCTOBER, 2023)
(REVISED MAY, 2025)
(REVISED OCTOBER, 2025)**

Prepared By



**EGA Consultants, LLC.
Engineers-Surveyors
408 N. Third St.
Lufkin, Texas 75901
(936) 634-5528**



10/31/25

**Engineering Registration No. F-1156
Surveying Registration No. 10029100**

**SPRING BRANCH TRANSFER STATION
TRANSFER STATION APPLICATION - PART I**

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ATTACHMENT 8: PROPERTY OWNER'S AFFIDAVIT	
ATTACHMENT 9: SUPPLEMENTARY TECHNICAL REPORT	
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10/31/25

SPRING BRANCH TRANSFER STATION

MSW PERMIT No. 2419

SUPPLEMENTARY TECHNICAL REPORT

**MAY, 2023
(REVISED JUNE, 2023)
(REVISED AUGUST, 2023)
(REVISED OCTOBER, 2023)
(REVISED MAY, 2025)
(REVISED OCTOBER, 2025)**

Prepared By



**EGA CONSULTANTS, LLC.
Engineers-Surveyors
408 N. Third St.
Lufkin, Texas 75901
(936) 634-5528**



10/31/25

**Engineering Registration No. F-1156
Surveying Registration No. 10029100**

The transfer building will be partially enclosed to protect it from rainfall and also equipped with floor drains to accommodate wash water. All working areas will be well ventilated due to the fact that the transfer building will not be a fully enclosed structure. The facility will restrict additional solid waste receipt if a significant work stoppage should occur due to a mechanical breakdown or other causes. Under such circumstances, incoming solid waste will be diverted to an approved backup storage, processing, or disposal facility. If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harborage of vectors, steps will be taken to remove the accumulated solid waste from the facility to an approved backup storage, processing, or disposal facility within 24 hours.

The working floor and dock area are designed to facilitate proper cleaning. The walls and floors in the operating areas are constructed of hard-surfaced materials that can be hosed down and scrubbed as needed. These areas are protected from rain by a covering roof and the surrounding external areas will be graded to direct runoff away from the facility. The working floors will be gently sloped so as to direct wash-water to drains that will collect this wash-water (and any other contaminated water) from which point it will be pumped to an above ground storage tank near the southwest corner of the transfer building. This holding tank will be emptied on an as-needed basis and hauled to a TCEQ approved facility for treatment and final disposal.

3. **SPILL CONTROL** - The storage and processing areas of the transfer station will be designed to control and contain spills and contaminated water and prevent it from leaving the facility. The site will also be graded to protect the transfer station from external storm water runoff. The proposed facility will be equipped with multiple portable restrooms for the use of staff and visitors. Wash-water and any other contaminated water from the proposed working floor and dock area will be directed to drains thence pumped to the proposed above ground storage tank. This storage tank will be emptied by vacuum truck on an as-needed basis and its contents transported to a TCEQ approved treatment facility for final disposal. The proposed holding tank will be completed prior to commencement of transfer station operations. The facility will be designed to control and contain a worst case spill or release. No contaminated water will be allowed to pond on the surface or run off as surface drainage. All liquids resulting from the operation of the transfer station will be disposed of in a manner that will not cause surface water or groundwater pollution. Drainage patterns will be minimally affected by this project, so no TPDES permit is required. The transfer station site is located outside of the 100-Year floodplain of Cypress Creek.
4. **ADDITIONAL PERMITTING** - All regulations pertaining to development in the Edwards Aquifer Contributing Zone will be complied with prior to construction of the facility. On September 19, 2023, TCEQ's Edwards Aquifer Protection Program indicated that this proposed facility is subject to that program's regulations. To that end, Hill Country Waste Solutions, Inc. has retained the services of TX2 Engineering to obtain the needed authorizations from the TCEQ's Edwards Aquifer Protection Program. TX2 Engineering has since acquired approval of the Contributing Zone Plan in regards to the Edwards Aquifer Protection Program and site plan revisions have been communicated to TX2 Engineering.

Since the disturbed area at the project site will be less than 5 acres in size, all the requirements of the nationwide general permit will be complied with for storm water and a Storm Water Pollution Prevention Plan and any additional notifications will be completed after the TCEQ approves the solid waste permit for the site and prior to construction of the facility.

If any air permits are required for the facility, it will fall under the criteria for Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations (Title 30, Chapter 330, Subchapter U).

SPRING BRANCH TRANSFER STATION

MSW PERMIT No. 2419
HILL COUNTRY WASTE SOLUTIONS LLC (OPERATOR)
SPRING BRANCH, COMAL COUNTY, TEXAS

PART I

MAY, 2023
(REVISED JUNE, 2023)
(REVISED AUGUST, 2023)
(REVISED OCTOBER, 2023)
(REVISED MAY, 2025)
(REVISED OCTOBER, 2025)

Prepared By



~~Everett Griffith, Jr. & Associates, Inc.~~ **EGA Consultants, LLC.**

Engineers-Surveyors
408 N. Third St.
Lufkin, Texas 75901
(936) 634-5528

Engineering Registration No. F-1156
Surveying Registration No. 10029100

**SPRING BRANCH TRANSFER STATION
TRANSFER STATION APPLICATION - PART I**

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ATTACHMENT 5: EVIDENCE OF COMPETENCY	
ATTACHMENT 6: CORE DATA FORMS	
ATTACHMENT 7: COPY OF CHECK FOR APPLICATION FEES	
ATTACHMENT 8: PROPERTY OWNER'S AFFIDAVIT	
ATTACHMENT 9: SUPPLEMENTARY TECHNICAL REPORT	
A. GENERAL DESCRIPTION	
B. DESCRIPTION OF WASTE	
1. PERMITTED CAPACITY	
2. TYPE OF WASTE ACCEPTED	
3. PROHIBITED WASTES	
C. OTHER INFORMATION	
1. ROADWAY ACCESS	
2. TRANSFER BUILDING DESIGN	
3. SPILL CONTROL	
4. ADDITIONAL PERMITTING	
ATTACHMENT 10: FEATURES WITHIN 500 FEET OF PROJECT SITE	
ATTACHMENT 11: FEATURES WITHIN 1 MILE OF THE PROJECT SITE	
ATTACHMENT 12: VERIFICATION OF LEGAL STATUS	



SPRING BRANCH TRANSFER STATION

MSW PERMIT No. 2419

SUPPLEMENTARY TECHNICAL REPORT

MAY, 2023
(REVISED JUNE, 2023)
(REVISED AUGUST, 2023)
(REVISED OCTOBER, 2023)
(REVISED MAY, 2025)
(REVISED OCTOBER, 2025)

Prepared By



~~Everett Griffith, Jr. & Associates, Inc.~~ EGA Consultants, LLC.

Engineers-Surveyors
408 N. Third St.
Lufkin, Texas 75901
(936) 634-5528

Engineering Registration No. F-1156
Surveying Registration No. 10029100

The transfer building will be partially enclosed to protect it from rainfall and also equipped with floor drains to accommodate wash water. All working areas will be well ventilated due to the fact that the transfer building will not be a fully enclosed structure. The facility will restrict additional solid waste receipt if a significant work stoppage should occur due to a mechanical breakdown or other causes. Under such circumstances, incoming solid waste will be diverted to an approved backup storage, processing, or disposal facility. If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harborage of vectors, steps will be taken to remove the accumulated solid waste from the facility to an approved backup storage, processing, or disposal facility within 24 hours.

The working floor and dock area are designed to facilitate proper cleaning. The walls and floors in the operating areas are constructed of hard-surfaced materials that can be hosed down and scrubbed as needed. These areas are protected from rain by a covering roof and the surrounding external areas will be graded to direct runoff away from the facility. The working floors will be gently sloped so as to direct wash-water to drains that will collect this wash-water (and any other contaminated water) from which point it will be pumped to an above ground storage tank near the southwest corner of the transfer building. This holding tank will be emptied on an as-needed basis and hauled to a TCEQ approved facility for treatment and final disposal.

3. **SPILL CONTROL** - The storage and processing areas of the transfer station will be designed to control and contain spills and contaminated water and prevent it from leaving the facility. The site will also be graded to protect the transfer station from external storm water runoff. The proposed facility will be equipped with multiple portable restrooms for the use of staff and visitors. Wash-water and any other contaminated water from the proposed working floor and dock area will be directed to drains thence pumped to the proposed above ground storage tank. This storage tank will be emptied by vacuum truck on an as-needed basis and its contents transported to a TCEQ approved treatment facility for final disposal. The proposed holding tank will be completed prior to commencement of transfer station operations. The facility will be designed to control and contain a worst case spill or release. No contaminated water will be allowed to pond on the surface or run off as surface drainage. All liquids resulting from the operation of the transfer station will be disposed of in a manner that will not cause surface water or groundwater pollution. Drainage patterns will be minimally affected by this project, so no TPDES permit is required. The transfer station site is located outside of the 100-Year floodplain of Cypress Creek.
4. **ADDITIONAL PERMITTING** - All regulations pertaining to development in the Edwards Aquifer Contributing Zone will be complied with prior to construction of the facility. On September 19, 2023, TCEQ's Edwards Aquifer Protection Program indicated that this proposed facility is subject to that program's regulations. To that end, Hill Country Waste Solutions, Inc. has retained the services of TX2 Engineering to obtain the needed authorizations from the TCEQ's Edwards Aquifer Protection Program. **TX2 Engineering has since acquired approval of the Contributing Zone Plan in regards to the Edwards Aquifer Protection Program and site plan revisions have been communicated to TX2 Engineering.**

Since the disturbed area at the project site will be less than 5 acres in size, all the requirements of the nationwide general permit will be complied with for storm water and a Storm Water Pollution Prevention Plan and any additional notifications will be completed after the TCEQ approves the solid waste permit for the site and prior to construction of the facility..

If any air permits are required for the facility, it will fall under the criteria for Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations (Title 30, Chapter 330, Subchapter U).