
SPRING BRANCH TRANSFER STATION

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

PART IV: SITE OPERATING PLAN

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

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

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- Random Inspections of incoming loads in accordance with the procedures described in this section.
- Maintaining records of all inspections.
- Notification of the Executive Director of any incident involving a regulated hazardous waste or a PCB waste.
- Remediation of any regulated hazardous waste or PCB waste discovered at the facility in accordance with 30 TAC §335.349.

If transfer station personnel identify any of the above indications with an incoming load, then that load will be directed to an area out of the flow of traffic, and the personnel will further assess the load. If the load is determined to contain prohibited waste or if there is any possibility that it may be prohibited waste, the load will be rejected and directed back to the generator. The supervisor will be diligent in looking for trucks bringing in waste loads from potential sources of prohibited waste such as industrial facilities, microelectronics manufacturers, electronic companies, metal plating industry, automotive and vehicle repair service companies, and dry cleaning establishments.

4.4 WASTE ANALYSIS - Walking floor trailers will be utilized at the facility to transfer waste from the transfer building to an approved landfill for final disposal. Each walking floor trailer will be of the 130 cubic yard variety with a legal carrying capacity of 26 tons. This will require approximately 58 trailer loads per day at the maximum permitted limit of 1,500 tons of municipal waste. These trailers will be driven down the ramp to the loading area on the west side of the transfer building where waste will be loaded onto them from the working floor. When full, the trailers will be covered and removed from the loading area and either driven directly to the receiving landfill or staged for transport in the transfer trailer parking area. Note that the transfer trailer parking area is separate from the transfer station building.

Only wastes that conform to the landfill's permit will be sent to the landfill. Under normal operating conditions, municipal solid waste should be hauled to the landfill at least once per day. In no event will the solid waste be stored in the box at the transfer station longer than 72 hours. All of the landfills in the area are closed on Sundays and on select holidays. The 72 hours of storage would allow for those times when the landfills are closed on Sunday with a holiday on the following Monday. Under normal circumstances the longest time that municipal solid waste would be stored on-site would typically be from Friday afternoon to Monday morning (around 60 hours). At no time will the amount of stored waste exceed the ultimate capacity of the facility.

It is anticipated that the treated and de-watered municipal sewage sludge will be stored on-site for no longer than 72 hours.

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NOISE POLLUTION AND VISUAL SCREENING [30 TAC §330.239]

The Spring Branch Transfer Station is located on a 23.80 acre tract located in Comal County, Texas. The proposed transfer station will only occupy a portion of the larger 23.80 acre site. The facility itself will be located on the southeastern portion of the tract adjacent to Highway 281 and will occupy approximately 9.52 acres of the site. Generally speaking, the site is bordered by Highway 281 to the east, by a commercial garden center to the north, and Jumbo Evans Sports Park to the west and south.

The nearest offsite residence is located approximately 1,100 feet southwest of the facility's southern boundary (on the opposite side of Jumbo Evan's Sports Park).

Access to the site will be controlled by a four wire fence around it to prevent the entry of livestock and to discourage unauthorized entry by the public. Some additional screening is provided by existing brush and trees which will be maintained during the operations of the facility.

Transfer activities will occur within a covered partially enclosed building equipped with walls on three sides to help mute noise. In addition, the entry to the transfer building faces the interior of the site and is equipped with aircraft hangar doors that can be lowered to help mute noises within the building. Noise pollution should not be a problem.

SECTION 22
SANITATION [30 TAC §330.243]

All working surfaces that come into contact with wastes will be swept daily.

The walking floor trailers at the facility will be situated on a curbed loading dock which provides access for unloading trucks. During normal operations, hose-down or scrubbing activities are not required for the trailers because they are washed off-site and come back clean. However, a water line and hose are provided at the site to facilitate wash-down in the event that such an action is ever required.

The pads, curbs, and retaining wall at the facility are constructed of materials which can be hosed down twice weekly. The facility supervisor will wash the concrete slabs at least twice per week and more often if odors or unsightly conditions prevail. In order to prevent the creation of odors or an attraction to vectors, wash water will not be allowed to accumulate on-site without proper treatment. The working floor and loading area of the transfer building is sloped in such a way as to direct wash water to the drains and thence to the above-ground holding tank. The holding tank will be emptied as-needed and its contents hauled to a TCEQ approved facility for final disposal.

In addition, no water will be allowed to pond on the site. If any rainwater ponds, the owner will be notified so that ponding can be eliminated.

Potable water will be supplied to the facility by water well or by the Canyon Lake Water Service Company. Both sources are capable of providing a sufficient supply of potable water to the facility.

Portable toilet facilities will be provided at several locations on-site for all employees and visitors. The wastewater generated from these restrooms will be removed on a regular basis and hauled to a TCEQ approved facility for final disposal.

VENTILATION AND AIR POLLUTION CONTROL [30 TAC §330.245]

The facility will not cause or contribute to air pollution. As required by 30 TAC §330.245c, all solid waste and liquid waste is stored in odor-retaining containers and vessels. Walking floor trailers are loaded by the Hill Country Waste Solutions LLC's collection trucks which deposit solid waste at the facility. The trailers are filled, loaded onto transport trucks, and driven to the receiving landfill. When a trailer is filled, it will be covered and dispatched to the receiving landfill and a new trailer will then begin receiving waste. Please note that Hill Country Waste Solutions LLC does not collect wastes from commercial customers (such as restaurants) that consist solely of food waste. However, the waste collected from their residential and commercial customers is expected to have some food residue as an incidental component. Any solid waste containing large concentrations of food wastes or residue that is stored overnight will be mechanically separated from the incoming waste stream and stored in covered or closed odor-retaining containers or stored within tarped and sealed transfer trailers that are leakproof, durable, and designed for safe handling and easy cleaning. The containers will be stored within the transfer station building for no longer than 72 hours under normal conditions. There will be no designated storage area specifically set aside for containers with food waste, but the containers themselves can be marked to indicate their contents for easy identification by facility personnel if necessary. Similarly, any of the tarped and sealed transfer trailers that are not immediately dispatched to the landfill will be staged in the transfer trailer parking area for no longer than 72 hours under normal conditions. The odor-retaining containers will be maintained in a clean condition so that they do not constitute a nuisance and to retard the harborage, feeding, and propagation of vectors. The mechanically handled odor-retaining containers are designed to prevent spillage or leakage during storage, handling, and transport. All working surfaces at the project site will be cleaned and maintained regularly so as to prevent nuisance odors. Cleaning and maintenance of mobile waste processing unit equipment shall be performed each day of operation to reduce odors. Waste transfer activities will be conducted within the transfer building and all working floors (where putrescible waste will be handled) and the loading area containing the active transfer trailer will be enclosed within the transfer building and covered by the building's roof. The transfer building will be designed so as to be enclosed on the three sides by walls that are facing the property boundaries in order to preclude odors from migrating in the directions of adjacent properties. The entry ways to the building are located on the side of the transfer building facing into the interior of the project site to allow for ventilation of the building. The entry ways to the transfer building's working floor is equipped with aircraft hangar doors and the ramped pit-area is equipped with roll-up doors. The doors may also be closed should operations be suspended due to nuisance odors; should such a situation arise, then all employees and public users will be evacuated from the building until the situation can be remedied. In addition, the entire site will be screened from the surrounding areas by a security fence and limited vegetation that will also serve to inhibit odors from leaving the site.

Any ponded water at the facility shall be controlled to avoid its becoming a nuisance. The working floor of the transfer building will be sloped so that wash water (or any other liquid) will be directed to drains which will collect wash water (or any other liquid) and direct it via drain line to a sump, thence it will be pumped to an above-ground contaminated water holding tank. The holding tank will be monitored daily to ensure their capacities are not exceeded and will be emptied on an as-needed basis and the contents hauled to a TCEQ approved facility for final disposal. The gravel surface will be sloped so as to direct runoff away from the transfer building. Similarly, the ground at the project site will be contoured so that stormwater runoff will be directed away from the transfer building. The entry driveway will be concrete paved and equipped with a crown to shed rainfall and prevent ponding there. In the event that ponding occurs on any of the lawn areas of the facility, those areas will be filled in and re-contoured so as to prevent standing water from occurring. In the event that objectionable odors do occur, appropriate measures shall be taken to alleviate the condition.

The design capacity of the Spring Branch Transfer Station will not be exceeded during operation. Solid waste accumulated at the facility will be processed within such time as will preclude the creation of odors, insect breeding, or harborage of other vectors. If such accumulations occur, additional solid waste will not be received until the adverse conditions are abated. In no event will solid waste be stored at the transfer station longer than 72 hours prior to transport off-site. At no time will the amount of stored waste exceed the ultimate capacity of the facility and it is anticipated that the facility will never exceed 900 tons of storage overnight.

If nuisance odors are found to be passing the facility boundary, the operator will immediately take actions to abate the nuisance, which may include suspending operations until the nuisance is abated. 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.

A secondary procedure will be put in place should the transfer station become inoperable for more than 24 hours. This procedure will consist of the collection trucks hauling their collected solid waste directly to TCEQ landfills for final disposal. This procedure will remain in operation until the transfer station is returned to operation.

Reporting of emissions events shall be made in accordance with 30 TAC §101.201 (pertaining to Emissions Event Reporting and Record Keeping Requirements) and reporting of scheduled maintenance shall be made in accordance with 30 TAC §101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Record-keeping Requirements).

23.1 VENTILATION - The transfer station will include a covered building. The health and safety of the operator and the individuals unloading at the station are not expected to be adversely impacted due to lack of proper ventilation due to the fact that the building is partially enclosed with three walls and the front end of the building equipped with aircraft hangar doors to allow for ventilation. Portable fans will also be provided at the facility which can be utilized on an as-needed basis to assist in ventilating the facility.

23.2 AIR POLLUTION CONTROL - Air emissions from the facility will not cause or contribute to a condition of air pollution as defined in the Texas Clean Air Act. The operator will prevent nuisance odors from leaving the boundary of the facility. If nuisance odors are found to be passing the facility boundary, the operator may suspend operations until the nuisance is abated or immediately take action to abate the nuisance.

The interior transfer station road surfaces will be of flexible base (6" soil cement with 8" limestone base). Dust should not pose a problem with this all-weather surface. However, in the unlikely event that dust does become a problem at the site, water and water hoses are available to dampen the problem areas to reduce dust.

23.3 AIR POLLUTION CONTROL DEVICES - If required in the future, this facility will obtain authorization for all constructed air pollutant devices under 30 TAC Chapter 116 (relating to Control of Air Pollution by Permits for New Construction or Modifications) or 30 TAC 330 Subchapter U (relating to Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations), as applicable, from the TCEQ Air Permits Division prior to the start of construction, except as authorized in Texas Health and Safety Code, §382.004 (pertaining to Construction While Permit Application Pending).

If air pollution control devices are required at some future date, they will be cleaned and maintained as per manufacturer's recommendations and as necessary so that the equipment efficiency can be adequately maintained in accordance with 30 TAC §330.245(e).

23.4 DISCUSSION OF COMPLIANCE WITH 30 TAC §330.245(f) - 30 TAC §330.245(f)(1) through (4) (pertaining to Ventilation and Air Pollution Control) states that "the owner or operator shall employ one or more of the following measures: (1) air scrubber units for odor control; (2) on-site buffer zones for odor control...; (3) additional waste handling procedures, storage procedures, and clean-up procedures for odor control when accepting putrescible waste; or (4) alternative ventilation and odor control measures". These are addressed in more detail below:

- Air Scrubber Units - No air scrubber units are proposed for the facility at this time.

- On-Site Buffer Zones - There are 50 foot buffer zones around the transfer station building and the transfer trailer parking area. These buffer zones are indicated on the proposed site layout plan; as shown therein, the distance from both structures to the facility boundary lines are in excess of 50 feet. Specifically, there is a distance of approximately 90 feet from the transfer building to the southern property line (bordering Jumbo Evans Sports Park). Similarly, there is a distance of approximately 55 feet from the transfer trailer parking area to the eastern property line (bordering U.S. Hwy 281). In effect, this extra distance will function as an additional on-site buffer zone to assist in odor control at the facility.
- Additional Waste Handling/Storage/Clean-up Procedures when Accepting Putrescible Waste - As noted above, if facility personnel visually identify incoming waste that contains a high percentage of food residue or food waste that will need to be stored overnight, then it will be either transferred from the working floor to a covered transfer trailer (and staged in the transfer trailer parking area) or to a covered odor-retaining container (and stored within the transfer station building). The filled trailers and containers will be stored at the facility for no longer than 72 hours under normal conditions.
- Alternative Ventilation and Odor Control Measures - Portable fans will also be provided at the facility which can be utilized to assist in ventilating the facility if needed.

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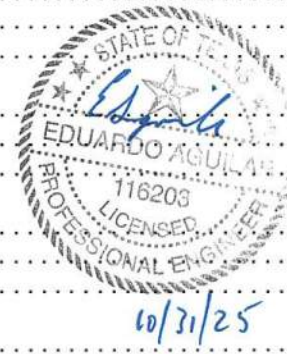


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SECTION 20

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Portable toilet facilities will be provided at several locations on-site for all employees and visitors. The wastewater generated from these restrooms will be removed on a regular basis and hauled to a TCEQ approved facility for final disposal.

VENTILATION AND AIR POLLUTION CONTROL [30 TAC §330.245]

The facility will not cause or contribute to air pollution. As required by 30 TAC §330.245c, all solid waste and liquid waste is stored in odor-retaining containers and vessels. Walking floor trailers are loaded by the Hill Country Waste Solutions LLC's collection trucks which deposit solid waste at the facility. The trailers are filled, loaded onto transport trucks, and driven to the receiving landfill. When a trailer is filled, it will be covered and dispatched to the receiving landfill and a new trailer will then begin receiving waste. Please note that Hill Country Waste Solutions LLC does not collect wastes from commercial customers (such as restaurants) that consist solely of food waste. However, the waste collected from their residential and commercial customers is expected to have some food residue as an incidental component. Any solid waste containing large concentrations of food wastes or residue that is stored overnight will be mechanically separated from the incoming waste stream and stored in covered or closed odor-retaining containers or stored within tarped and sealed transfer trailers that are leakproof, durable, and designed for safe handling and easy cleaning. The containers will be stored within the transfer station building for no longer than 72 hours under normal conditions. There will be no designated storage area specifically set aside for containers with food waste, but the containers themselves can be marked to indicate their contents for easy identification by facility personnel if necessary. Similarly, any of the tarped and sealed transfer trailers that are not immediately dispatched to the landfill will be staged in the transfer trailer parking area for no longer than 72 hours under normal conditions. The odor-retaining containers will be maintained in a clean condition so that they do not constitute a nuisance and to retard the harborage, feeding, and propagation of vectors. The mechanically handled odor-retaining containers are designed to prevent spillage or leakage during storage, handling, and transport. All working surfaces at the project site will be cleaned and maintained regularly so as to prevent nuisance odors. Cleaning and maintenance of mobile waste processing unit equipment shall be performed each day of operation to reduce odors. Waste transfer activities will be conducted within the transfer building and all working floors (where putrescible waste will be handled) and the loading area containing the active transfer trailer will be enclosed within the transfer building and covered by the building's roof. The transfer building will be designed so as to be enclosed on the three sides by walls that are facing the property boundaries in order to preclude odors from migrating in the directions of adjacent properties. The entry ways to the building are located on the side of the transfer building facing into the interior of the project site to allow for ventilation of the building. The entry ways to the transfer building's working floor **is equipped with aircraft hangar doors** and the ramped pit-area **are also** equipped with roll-up doors. The **roll-up** doors may also be closed should operations be suspended due to nuisance odors; should such a situation arise, then all employees and public users will be evacuated from the building until the situation can be remedied. In addition, the entire site will be screened from the surrounding areas by a security fence and limited vegetation that will also serve to inhibit odors from leaving the site.

Any ponded water at the facility shall be controlled to avoid its becoming a nuisance. The working floor of the transfer building will be sloped so that wash water (or any other liquid) will be directed to drains which will collect wash water (or any other liquid) and direct it via drain line to a sump, thence it will be pumped to an above-ground contaminated water holding tank. The holding tank will be monitored daily to ensure their capacities are not exceeded and will be emptied on an as-needed basis and the contents hauled to a TCEQ approved facility for final disposal. The gravel surface will be sloped so as to direct runoff away from the transfer building. Similarly, the ground at the project site will be contoured so that stormwater runoff will be directed away from the transfer building. The entry driveway will be concrete paved and equipped with a crown to shed rainfall and prevent ponding there. In the event that ponding occurs on any of the lawn areas of the facility, those areas will be filled in and re-contoured so as to prevent standing water from occurring. In the event that objectionable odors do occur, appropriate measures shall be taken to alleviate the condition.

The design capacity of the Spring Branch Transfer Station will not be exceeded during operation. Solid waste accumulated at the facility will be processed within such time as will preclude the creation of odors, insect breeding, or harborage of other vectors. If such accumulations occur, additional solid waste will not be received until the adverse conditions are abated. In no event will solid waste be stored at the transfer station longer than 72 hours prior to transport off-site. At no time will the amount of stored waste exceed the ultimate capacity of the facility and it is anticipated that the facility will never exceed 900 tons of storage overnight.

If nuisance odors are found to be passing the facility boundary, the operator will immediately take actions to abate the nuisance, which may include suspending operations until the nuisance is abated. 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.

A secondary procedure will be put in place should the transfer station become inoperable for more than 24 hours. This procedure will consist of the collection trucks hauling their collected solid waste directly to TCEQ landfills for final disposal. This procedure will remain in operation until the transfer station is returned to operation.

Reporting of emissions events shall be made in accordance with 30 TAC §101.201 (pertaining to Emissions Event Reporting and Record Keeping Requirements) and reporting of scheduled maintenance shall be made in accordance with 30 TAC §101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Record-keeping Requirements).

23.1 VENTILATION - The transfer station will include a covered building. The health and safety of the operator and the individuals unloading at the station are not expected to be adversely impacted due to lack of proper ventilation due to the fact that the building is partially enclosed with three walls and the front end of the building equipped with roll-up aircraft hangar doors to allow for ventilation. Portable fans will also be provided at the facility which can be utilized on an as-needed basis to assist in ventilating the facility.

23.2 AIR POLLUTION CONTROL - Air emissions from the facility will not cause or contribute to a condition of air pollution as defined in the Texas Clean Air Act. The operator will prevent nuisance odors from leaving the boundary of the facility. If nuisance odors are found to be passing the facility boundary, the operator may suspend operations until the nuisance is abated or immediately take action to abate the nuisance.

The interior transfer station road surfaces will be of flexible base (6" soil cement with 8" limestone base). Dust should not pose a problem with this all-weather surface. However, in the unlikely event that dust does become a problem at the site, water and water hoses are available to dampen the problem areas to reduce dust.

23.3 AIR POLLUTION CONTROL DEVICES - If required in the future, this facility will obtain authorization for all constructed air pollutant devices under 30 TAC Chapter 116 (relating to Control of Air Pollution by Permits for New Construction or Modifications) or 30 TAC 330 Subchapter U (relating to Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations), as applicable, from the TCEQ Air Permits Division prior to the start of construction, except as authorized in Texas Health and Safety Code, §382.004 (pertaining to Construction While Permit Application Pending).

If air pollution control devices are required at some future date, they will be cleaned and maintained as per manufacturer's recommendations and as necessary so that the equipment efficiency can be adequately maintained in accordance with 30 TAC §330.245(e).

23.4 DISCUSSION OF COMPLIANCE WITH 30 TAC §330.245(f) - 30 TAC §330.245(f)(1) through (4) (pertaining to Ventilation and Air Pollution Control) states that "the owner or operator shall employ one or more of the following measures: (1) air scrubber units for odor control; (2) on-site buffer zones for odor control...; (3) additional waste handling procedures, storage procedures, and clean-up procedures for odor control when accepting putrescible waste; or (4) alternative ventilation and odor control measures". These are addressed in more detail below:

- Air Scrubber Units - No air scrubber units are proposed for the facility at this time.

- On-Site Buffer Zones - There are 50 foot buffer zones around the transfer station building and the transfer trailer parking area. These buffer zones are indicated on the proposed site layout plan; as shown therein, the distance from both structures to the facility boundary lines are in excess of 50 feet. Specifically, there is a distance of approximately 80 feet 90 feet from the transfer building to the southern property line (bordering Jumbo Evans Sports Park). Similarly, there is a distance of approximately 55 feet from the transfer trailer parking area to the eastern property line (bordering U.S. Hwy 281). In effect, this extra distance will function as an additional on-site buffer zone to assist in odor control at the facility.
- Additional Waste Handling/Storage/Clean-up Procedures when Accepting Putrescible Waste - As noted above, if facility personnel visually identify incoming waste that contains a high percentage of food residue or food waste that will need to be stored overnight, then it will be either transferred from the working floor to a covered transfer trailer (and staged in the transfer trailer parking area) or to a covered odor-retaining container (and stored within the transfer station building). The filled trailers and containers will be stored at the facility for no longer than 72 hours under normal conditions.
- Alternative Ventilation and Odor Control Measures - Portable fans will also be provided at the facility which can be utilized to assist in ventilating the facility if needed.