



**Everett Griffith, Jr. & Associates Inc.**  
ENGINEERS • SURVEYORS

April 23, 2025

Xiaodong Zhang, P.E., Project Manager  
Municipal Solid Waste Permits – MC 124  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 239-0521  
[Xiaodong.Zhang@tceq.texas.gov](mailto:Xiaodong.Zhang@tceq.texas.gov)

**SUBMITTED ELECTRONICALLY AND VIA CERTIFIED MAIL**

RE: Tyler County Transfer Station (MSW Registration No. 40343)  
Response to NOD 3 - TCEQ Tracking No. 30272375  
Supplemental Submittal with THC Comments

Dear Mr. Zhang:

This submittal is made in response to your e-mail dated April 11, 2025. The following table lists the relevant comments from your April 11<sup>th</sup> e-mail (in bold print for clarity of reading) followed by a response. The response also includes the location of revisions by reference to part, section, and page number:

NOD ID	TCEQ Comment and Response	Location of Revision
NT1	Correct the inconsistencies in Part II Table of Contents (TOC): a) Revise the title of Section 9 to "Transportation [30 TAC 330.61(i)]" in the clean copy. This is correct in the marked copy. <b>Response:</b> In the clean copy of the TOC, the title of Section 9 has been revised to "Transportation [30 TAC 330.61(i)]".	Part II, Table of Contents (Page II-A)
	b) Delete subsections A through F under Section 9.2.2 from TOC or provide a revised Section 9.2.2 to include these subsections. <b>Response:</b> Subsections A through F under Section 9.2.2 have been deleted from the TOC.	Part II, Table of Contents (Page II-A)
	c) Revise the revision note of "Rev 032/2025" to "Rev 03/2025" in the clean copy. <b>Response:</b> Revision note has been revised to read "Rev 03/2025".	Part II, Table of Contents (Page II-A)
NOD ID	TCEQ Comment and Response	Location of Revision
T3	Correct the inconsistency in the intended destination for final disposal of construction waste between Section 4.4 of Part IV and Section 2.1.2 of Part II. <b>Response:</b> In Section 4.4 of Part IV, "or LCEQ" has been deleted from last paragraph.	Part IV, Page IV-7

Xiaodong Zhang, P.E., Project Manager  
Tyler County Transfer Station (MSW Registration No. 40343)  
Supplemental Response to NOD 3 - TCEQ Tracking No. 30272375  
April 23, 2025; Page 2 of 2

The following is a summary of the revised pages of the application that are submitted with this cover letter:

- A completed Correspondence Cover Sheet (Form TCEQ-20714)
- Part II - Revised Table of Contents, Page II-A. Note that each page has been stamped by the project engineer
- Part IV - Revised Page IV-7
- New applicant certification and signature page (Pages 13 and 14 of Form TCEQ-00650)

An original and two (2) un-marked copies of the revised pages are attached herewith. An additional marked copy (in redline/strike-out format) is also included for applicable pages. As requested, an un-marked copy has been submitted directly to the TCEQ Region 10 Office addressed to the attention of the waste section manager. The above listed pages have all been three-hole punched for inclusion or replacement in this project's previously submitted three-ring binders.

If you have any questions, comments, or need any additional information regarding this project, please contact me via telephone at 936-634-5528 or via e-mail at [eaguilar@everettgriffith.com](mailto:eaguilar@everettgriffith.com).

Sincerely,



Eddie Aguilar, P.E.

Enclosures

cc: James D. Broussard (email)

cc: Waste Section Manager, TCEQ Region 10 Office, 3870 Eastex Fwy, Beaumont, TX 77703



# Texas Commission on Environmental Quality

## Waste Permits Division Correspondence

### Cover Sheet

Date: April 23, 2025

Facility Name: Tyler County Transfer Station

Permit or Registration No.: 40343

Nature of Correspondence:

☐ Initial/New

☒ Response/Revision to TCEQ Tracking No.:  
30272375 (from subject line of TCEQ letter  
regarding initial submission)

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

**Table 1 - Municipal Solid Waste Correspondence**

Applications	Reports and Notifications
<input type="checkbox"/> New Notice of Intent	<input type="checkbox"/> Alternative Daily Cover Report
<input type="checkbox"/> Notice of Intent Revision	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Compost Report
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input 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 checked="" type="checkbox"/> Other: <b>Resubmittal of registration to increase waste acceptance rate and add office and shop</b>	

**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:	



## PART II - TABLE OF CONTENTS

### SECTION

PAGE No.

SECTION 1: EXISTING CONDITIONS SUMMARY [30 TAC §330.61(a)]	II-2
--	------

SECTION 2: WASTE ACCEPTANCE PLAN [30 TAC §330.61(b)]	II-3
--	------

2.1 SOURCES AND CHARACTERISTICS OF ACCEPTED WASTES [30 TAC §330.61(b)(1)]	II-3
2.1.1 WASTE SOURCES AND GENERATION AREAS [30 TAC §330.61(b)(1)(A)]	II-3
2.1.2 MAXIMUM AMOUNT OF WASTE RECEIVED [30 TAC §330.61(b)(1)(B)]	II-3
2.1.3 MAXIMUM ANNUAL WASTE ACCEPTANCE RATE FOR LANDFILL [30 TAC §330.61(b)(1)(C)]	II-4
2.1.4 ACCEPTED AND PROHIBITED WASTES	II-4
2.1.4.1 ACCEPTED WASTES	II-4
2.1.4.2 PROHIBITED WASTES	II-4
2.1.5 WASTE RECOVERY [30 TAC §330.61(b)(1)(A)]	II-5
2.2 REGISTRATION QUALIFICATIONS [30 TAC §330.61(b)(2)]	II-5

SECTION 3: GENERAL LOCATION MAPS [30 TAC §330.61(c)]	II-6
--	------

3.1 GENERAL LOCATION MAP AND WINDROSE	II-6
3.2 FEATURES WITHIN 500 FEET OF THE PROJECT SITE [30 TAC §330.61(c)(2) - (4)]	II-6

SECTION 4: FACILITY LAYOUT MAPS [30 TAC §330.61(d)]	II-8
---	------

4.1 FACILITY UNITS AND BUILDINGS [30 TAC §330.61(d)(1), (2), and (4)]	II-8
4.2 INTERIOR FACILITY ROADWAYS AND ENTRANCE ROADS [30 TAC §330.61(d)(2) and (8)]	II-8
4.3 LOCATIONS OF MONITOR WELLS [30 TAC §330.61(d)(3)]	II-8
4.4 FENCING [30 TAC §330.61(d)(6)]	II-8
4.5 MAINTENANCE OF WINDBREAKS [30 TAC §330.61(d)(7)]	II-8
4.6 CONSTRUCTION SEQUENCE OF THE FACILITY [30 TAC §330.61(d)(5)]	II-8
4.7 LANDFILL UNITS [30 TAC §330.61(d)(9)]	II-8

SECTION 5: GENERAL TOPOGRAPHIC MAP [30 TAC §330.61(e)]	II-9
--	------

SECTION 6: AERIAL PHOTOGRAPH [30 TAC §330.61(f)]	II-10
--	-------

SECTION 7: LAND-USE MAP [30 TAC §330.61(g)]	II-11
---	-------

SECTION 8: IMPACT ON SURROUNDING AREA [30 TAC §330.61(h)]	II-12
---	-------

8.1 ZONING MAP [30 TAC §330.61(h)(1)]	II-12
8.2 SURROUNDING LAND USES [30 TAC §330.61(h)(2)]	II-12
8.3 GROWTH TRENDS WITHIN 5 MILES OF THE FACILITY [30 TAC §330.61(h)(3)]	II-13
8.4 PROXIMITY OF SITE [30 TAC §330.61(h)(4)]	II-14
8.4.1 POPULATION DENSITIES WITHIN A MILE OF THE SITE	II-14
8.4.2 PROXIMITY TO RESIDENCES	II-14
8.4.3 PROXIMITY TO SCHOOLS	II-14
8.4.4 PROXIMITY TO CHURCHES	II-14
8.4.5 PROXIMITY TO CEMETERIES	II-14
8.4.6 PROXIMITY TO HISTORIC STRUCTURES AND SITES	II-15
8.4.7 PROXIMITY TO ARCHEOLOGICALLY SIGNIFICANT SITES	II-15
8.4.8 PROXIMITY TO SITES HAVING EXCEPTIONALLY AESTHETIC QUALITY	II-15
8.5 WATER WELLS WITHIN 500 FEET [30 TAC §330.61(h)(5)]	II-15

SECTION 9: TRANSPORTATION [30 TAC §330.61(i)]	II-16
---	-------

9.1 AVAILABILITY AND ADEQUACY OF ROADS [30 TAC §330.61(i)(1)]	II-16
9.2 VOLUME OF VEHICULAR TRAFFIC [30 TAC §330.61(i)(2) and (3)]	II-16
9.2.1 EXISTING VOLUME OF TRAFFIC AT EXISTING CONDITIONS	II-16
9.2.2 ANTICIPATED VOLUME OF TRAFFIC AT FULL CAPACITY	II-16
9.3 DESIGN COORDINATION [30 TAC §330.61(i)(4)]	II-16
9.4 IMPACT OF THE FACILITY ON AIRPORTS [30 TAC §330.61(i)(5)]	II-17



- In all operations (including customer rentals) the Owner currently utilizes twelve 30 yard open containers, four 20 yard open containers, and three 40 yard closed containers.

Please note that the Owner parks the trucks and spare boxes on site.

A maximum of 45 tons waste will be stored at any one point in time at the facility. At the present time, municipal solid waste makes up approximately 95% of the incoming waste stream to this facility, while construction debris amounts to approximately 3% and white goods approximately 2%.

Municipal solid waste will be stored at the facility for an average length of time of two days up to a maximum length of time not to exceed 5 days. Local Sanitation curbside garbage trucks and private residents enter the compactor building and transfer their loads of municipal solid waste to the of the facility's 5.0 cubic yard compactor. The solid waste is then compacted and deposited to a 40 cubic yard covered container where it awaits transport for final disposal. Compaction of the municipal solid waste will normally be conducted daily when the facility is in operation. This compacted municipal solid waste will then be transported to a TCEQ approved landfill for final disposal.

Metal and white goods (such as refrigerators, washers, dryers, etc.) deposited at the site will be accumulated on the existing concrete slab in the southwest corner of the site and they are typically hauled to a recycler of white goods once or twice a year as needed.

Construction debris is deposited in a dedicated 40 CY container and is transported as required to a TCEQ approved landfill on an as-needed basis when full, so its average storage time on site varies.

## 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: James D. Broussard Title: Owner/Operator

Email Address: james.b@localsanitation.com

Signature: [Signature] Date: 4.23.25

### 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, n/a to submit this application pursuant to 30 TAC 305.43(c).

Name: n/a Title: n/a

Email Address: n/a

Signature: n/a Date: n/a

### Notary

SUBSCRIBED AND SWORN to before me by the said James D. Broussard

On this 23<sup>rd</sup> day of April, 2025

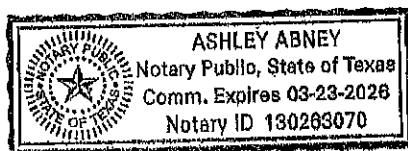
My commission expires on the 23<sup>rd</sup> day of March, 2026

[Signature]

Notary Public in and for

Tyler Co. Texas (notary's jurisdiction, including county and state)

Note: Application Must Bear Signature & Seal of Notary Public



## Property Owner Affidavit

### Property Owner Affidavit for Landfill Facility

I acknowledge in accordance with 30 TAC 330.59(d)(2) that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure and post-closure care of the facility. For a facility where waste will remain after closure, I acknowledge that I have a responsibility to file with the county deed records an affidavit to the public advising that the land will be used for a solid waste facility prior to the time that the facility actually begins operating as a municipal solid waste landfill facility, and to file a final recording upon completion of disposal operations and closure of the landfill units according to 30 TAC 330.19 (relating to Deed Recordation). I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and post-closure care period for the purpose of inspection and maintenance.

Name: n/a

Email Address: n/a

Signature: n/a

Date: n/a

### Property Owner Affidavit for Processing Facility

I acknowledge in accordance with 30 TAC 330.59(d)(2) that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure of the facility. I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and post-closure care period for the purpose of inspection and maintenance.

Name: James D. Broussard

Email Address: james.b@localsanitation.com

Signature: [Signature]

Date: 4.23.25

### Notary

SUBSCRIBED AND SWORN to before me by the said James D. Broussard

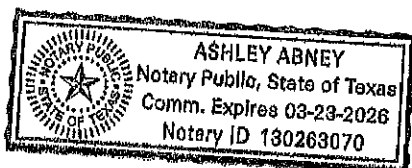
On this 23 day of April, 2025

My commission expires on the 23rd day of March, 2026

[Signature]  
Notary Public in and for

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

Note: Application Must Bear Signature & Seal of Notary Public





## PART II - TABLE OF CONTENTS

### SECTION

### PAGE No.

<b>SECTION 1: EXISTING CONDITIONS SUMMARY [30 TAC §330.61(a)]</b>	<b>II-2</b>
---	-------------

<b>SECTION 2: WASTE ACCEPTANCE PLAN [30 TAC §330.61(b)]</b>	<b>II-3</b>
---	-------------

2.1 SOURCES AND CHARACTERISTICS OF ACCEPTED WASTES [30 TAC §330.61(b)(1)]	II-3
2.1.1 WASTE SOURCES AND GENERATION AREAS [30 TAC §330.61(b)(1)(A)]	II-3
2.1.2 MAXIMUM AMOUNT OF WASTE RECEIVED [30 TAC §330.61(b)(1)(B)]	II-3
2.1.3 MAXIMUM ANNUAL WASTE ACCEPTANCE RATE FOR LANDFILL [30 TAC §330.61(b)(1)(C)]	II-4
2.1.4 ACCEPTED AND PROHIBITED WASTES	II-4
2.1.4.1 ACCEPTED WASTES	II-4
2.1.4.2 PROHIBITED WASTES	II-4
2.1.5 WASTE RECOVERY [30 TAC §330.61(b)(1)(A)]	II-5
2.2 REGISTRATION QUALIFICATIONS [30 TAC §330.61(b)(2)]	II-5

<b>SECTION 3: GENERAL LOCATION MAPS [30 TAC §330.61(c)]</b>	<b>II-6</b>
---	-------------

3.1 GENERAL LOCATION MAP AND WINDROSE	II-6
3.2 FEATURES WITHIN 500 FEET OF THE PROJECT SITE [30 TAC §330.61(c)(2) - (4)]	II-6

<b>SECTION 4: FACILITY LAYOUT MAPS [30 TAC §330.61(d)]</b>	<b>II-8</b>
--	-------------

4.1 FACILITY UNITS AND BUILDINGS [30 TAC §330.61(d)(1), (2), and (4)]	II-8
4.2 INTERIOR FACILITY ROADWAYS AND ENTRANCE ROADS [30 TAC §330.61(d)(2) and (8)]	II-8
4.3 LOCATIONS OF MONITOR WELLS [30 TAC §330.61(d)(3)]	II-8
4.4 FENCING [30 TAC §330.61(d)(6)]	II-8
4.5 MAINTENANCE OF WINDBREAKS [30 TAC §330.61(d)(7)]	II-8
4.6 CONSTRUCTION SEQUENCE OF THE FACILITY [30 TAC §330.61(d)(5)]	II-8
4.7 LANDFILL UNITS [30 TAC §330.61(d)(9)]	II-8

<b>SECTION 5: GENERAL TOPOGRAPHIC MAP [30 TAC §330.61(e)]</b>	<b>II-9</b>
---	-------------

<b>SECTION 6: AERIAL PHOTOGRAPH [30 TAC §330.61(f)]</b>	<b>II-10</b>
---	--------------

<b>SECTION 7: LAND-USE MAP [30 TAC §330.61(g)]</b>	<b>II-11</b>
--	--------------

<b>SECTION 8: IMPACT ON SURROUNDING AREA [30 TAC §330.61(h)]</b>	<b>II-12</b>
--	--------------

8.1 ZONING MAP [30 TAC §330.61(h)(1)]	II-12
8.2 SURROUNDING LAND USES [30 TAC §330.61(h)(2)]	II-12
8.3 GROWTH TRENDS WITHIN 5 MILES OF THE FACILITY [30 TAC §330.61(h)(3)]	II-13
8.4 PROXIMITY OF SITE [30 TAC §330.61(h)(4)]	II-14
8.4.1 POPULATION DENSITIES WITHIN A MILE OF THE SITE	II-14
8.4.2 PROXIMITY TO RESIDENCES	II-14
8.4.3 PROXIMITY TO SCHOOLS	II-14
8.4.4 PROXIMITY TO CHURCHES	II-14
8.4.5 PROXIMITY TO CEMETERIES	II-14
8.4.6 PROXIMITY TO HISTORIC STRUCTURES AND SITES	II-15
8.4.7 PROXIMITY TO ARCHEOLOGICALLY SIGNIFICANT SITES	II-15
8.4.8 PROXIMITY TO SITES HAVING EXCEPTIONALLY AESTHETIC QUALITY	II-15
8.5 WATER WELLS WITHIN 500 FEET [30 TAC §330.61(h)(5)]	II-15



<b>SECTION 9: TRANSPORTATION [30 TAC §330.61(i)]</b>	<b>II-16</b>
--	--------------

9.1 AVAILABILITY AND ADEQUACY OF ROADS [30 TAC §330.61(i)(1)]	II-16
9.2 VOLUME OF VEHICULAR TRAFFIC [30 TAC §330.61(i)(2) and (3)]	II-16
9.2.1 EXISTING VOLUME OF TRAFFIC AT EXISTING CONDITIONS	II-16
9.2.2 ANTICIPATED VOLUME OF TRAFFIC AT FULL CAPACITY	II-16
A. COLLECTION TRUCKS	II-16
B. TRANSFER TRUCKS	II-16
C. EMPLOYEE PERSONAL VEHICLES	II-16
D. GENERAL PUBLIC	II-16
E. ESTIMATED NUMBER OF TRIPS AT 300 TONS/DAY	II-16
F. ESTIMATED NUMBER OF TRIPS AT MAXIMUM CAPACITY (1,500 TONS/DAY)	II-16
9.3 DESIGN COORDINATION [30 TAC §330.61(i)(4)]	II-16
9.4 IMPACT OF THE FACILITY ON AIRPORTS [30 TAC §330.61(i)(5)]	II-17



garbage trucks with their next 5 Year Plan.

- One roll-off truck to remove the dumpsters from the transfer station along with some outside customer rental boxes
- In all operations (including customer rentals) the Owner currently utilizes twelve 30 yard open containers, four 20 yard open containers, and three 40 yard closed containers.

Please note that the Owner parks the trucks and spare boxes on site.

A maximum of 45 tons waste will be stored at any one point in time at the facility. At the present time, municipal solid waste makes up approximately 95% of the incoming waste stream to this facility, while construction debris amounts to approximately 3% and white goods approximately 2%.

Municipal solid waste will be stored at the facility for an average length of time of two days up to a maximum length of time not to exceed 5 days. ~~Local Sanitation curbside garbage trucks and private residents enter the compactor building and transfer their loads of municipal solid waste to the of the facility's 5.0 cubic yard compactor. The solid waste is then compacted and deposited to a 40 cubic yard covered container where it awaits transport for final disposal. Processing~~ Compaction of the municipal solid waste will normally be conducted daily when the facility is in operation. This compacted municipal solid waste will then be transported to ~~either a TCEQ approved landfill in Texas for final disposal or to a LCEQ approved landfill in Louisiana for final disposal (the exact destination varies depending on disposal fees and fuel costs at any given time).~~

Metal and white goods (such as refrigerators, washers, dryers, etc.) deposited at the site will be accumulated on the existing concrete slab in the southwest corner of the site and they are typically hauled to a recycler of white goods once or twice a year as needed.

Construction debris is deposited in a dedicated 40 CY container and is transported as required to a TCEQ ~~or LCEQ~~ approved landfill on an as-needed basis when full, so its average storage time on site varies.