



October 9, 2025

Ms. Madison Howard, Project Manager
Municipal Solid Waste Permits Section (MC-124)
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

RE: Response to Notice of Deficiency (NOD)
Application for Medical Waste Registration
Daniels Arlington Facility
Municipal Solid Waste – Registration No. 40345
Response to Notice of Deficiency (NOD)
Tracking No. 31578569; RN112211545/CN603401506

Dear Ms. Howard:

This letter is provided on behalf of Daniels Sharpsmart, Inc. in response to TCEQ's August 26, 2025 Notice of Deficiency (NOD 2) email for the above-mentioned registration application. The attached Table of Deficiencies details the TCEQ's NOD 2 descriptions and the applicant's response to each NOD item.

An original plus one copy of the revised pages is included with this submittal (Attachment 1). Since no changes were made to the text of the application, a redline/strikeout copy is not provided. Revised figures include a revision block. A copy of this submittal will be provided to the TCEQ Region 4 office. If you have any questions or comments, please contact me at (361) 883-1984 or [REDACTED]

Sincerely,

A handwritten signature in blue ink that reads "Amy R. Hesseltnie".

Amy R. Hesseltnie, P.E.
Environmental Group Leader

Attachments

cc: Kyle Little, Director of Compliance, Daniels Sharpsmart, Inc.
Erin Gorman, Waste Section Manager, TCEQ Region 4
Robert Pederson, P.E., MSW Permits, TCEQ (via email)

Table of Deficiencies

NOD ID	Citation	Location	NOD Type	NOD Description	Applicant Response
1	326.71(h)(3)	Section 2.4	Incomplete	Describe how the alternative buffer provides ready access for emergency response vehicles, including how emergency vehicles will access the east side of the facility without buffer and how emergency vehicles will navigate through the drainage easements on the south and north sides of the facility. The buffer zone must not be narrower than necessary to provide safe passage for firefighting and other emergency vehicles.	The existing building was constructed in accordance with City of Arlington building codes including those for fire. Firefighting and emergency vehicles can access the property through the existing driveway entrances on the south and west sides of the property. Firefighting and emergency vehicles can drive in the buffer zones, but it is not necessary to drive in the buffer zones to access the building. The railroad right-of-way on the east side of the facility could be used to access the building for firefighting purposes and hoses could be stretched from fire hydrants. The Facility Layout Maps (Attachment 2, Figures 1 and 2) were updated to add the location of the fire hydrant on E. Randol Mill Rd. west of the facility's property boundary. The drainage easements across the property on the north and south sides do not impede access. The easements are at grade (i.e. not ditches). Photos of are provided in Attachment 2 of this submittal. The 20 ft wide buffer on the north side of the property is sufficient to provide access to the north side of the building.
2	326.71(a)(2)	Attachment 2, Figures 1 and 2	Omitted	Depict the locations of hazardous waste storage authorized under Solid Waste Registration number 99193 and EPA ID TXR000087232.	The Facility Layout Maps (Registration Application Attachment 2, Figures 1 and 2) were revised to include reference to SWR No. 99193.
3	326.71(e)	Attachment 9	Incomplete	Provide a response letter from TxDOT coordination.	A response letter from TxDOT dated September 10, 2025 was received on October 8, 2025. A copy of the letter is included with this submittal.
4	326.71(i)	Attachment 14	Incomplete	Provide manufacturer specifications regarding autoclave capacity. The document provided in the NOD 1 response does not provide specifications for the facility's specific waste processing units.	The autoclave manufacturer does not include capacity on the specifications. Autoclave capacity can vary based on waste type, waste density, and number of bins. The capacity provided in the application (5,000 lb/cycle) is based on performance of similar autoclaves at the applicant's other facilities. Please refer to Attachment 3 for autoclave capacity determination.

ATTACHMENT 1

UNMARKED COPY

ORIGINAL AND ONE COPY

Texas Commission on Environmental Quality
Application for a Medical Waste Registration
Daniels Arlington Facility
Registration 40345
Arlington, Tarrant County, Texas

April 2025

Technical Review 1: July 2025; Technical Review 2: October 2025

Prepared for

Daniels Sharpsmart, Inc.

111 W. Jackson Blvd, Suite 1900

Chicago, IL 60604

Prepared by

Amy Hesseltine, PE

Ardurra Group, Inc.

TBPE Firm Registration Number 10053

801 Navigation Blvd, Suite 300

Corpus Christi, Texas 78408



10/3/25
Amy R Hesseltine

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Section 6—Applicant Certification and Signature

The applicant is the person or entity who would be the owner of the facility and in whose name the registration would be issued. If the application is signed by an authorized representative for the applicant, the applicant must complete the delegation of signature authority.

Certification by Applicant or Authorized Signatory [30 TAC §305.44]

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 of applicant, or other person authorized to sign: Taylor Derleth, on behalf of Daniels Sharpsmart

Title of person signing: Authorized Signatory

Signature: Taylor Derleth Date: 10/09/2025

Notarization

SUBSCRIBED AND SWORN to before me by the said Taylor Derleth
Notarized online using audio-video communication

On this 9th day of October, 2025

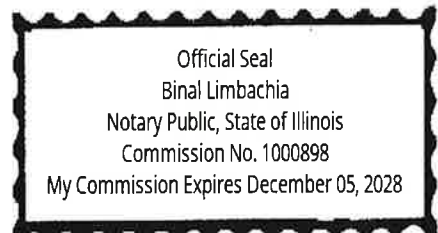
My commission expires on the 5th day of December, 2028.

Binal Limbachia

Notary Public in and for

Illinois, Cook

Binal Limbachia
County, Illinois



Applicant's Delegation of Signature Authority [30 TAC §305.43]

I hereby delegate the person named below as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and appear for me at any hearing or before the Commission 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.

Name of applicant's representative: _____

Name of person who is the applicant, or officer or official representing corporation or public agency that is the applicant: _____

Signature: Taylor Derleth Date: 10/09/2025

Notarization

SUBSCRIBED AND SWORN to before me by the said Taylor Derleth

On this 9th day of October, 2025.

My commission expires on the 5th day of December, 2028.

Binal Limbachia

Notary Public in and for

Illinois, Cook County, Texas

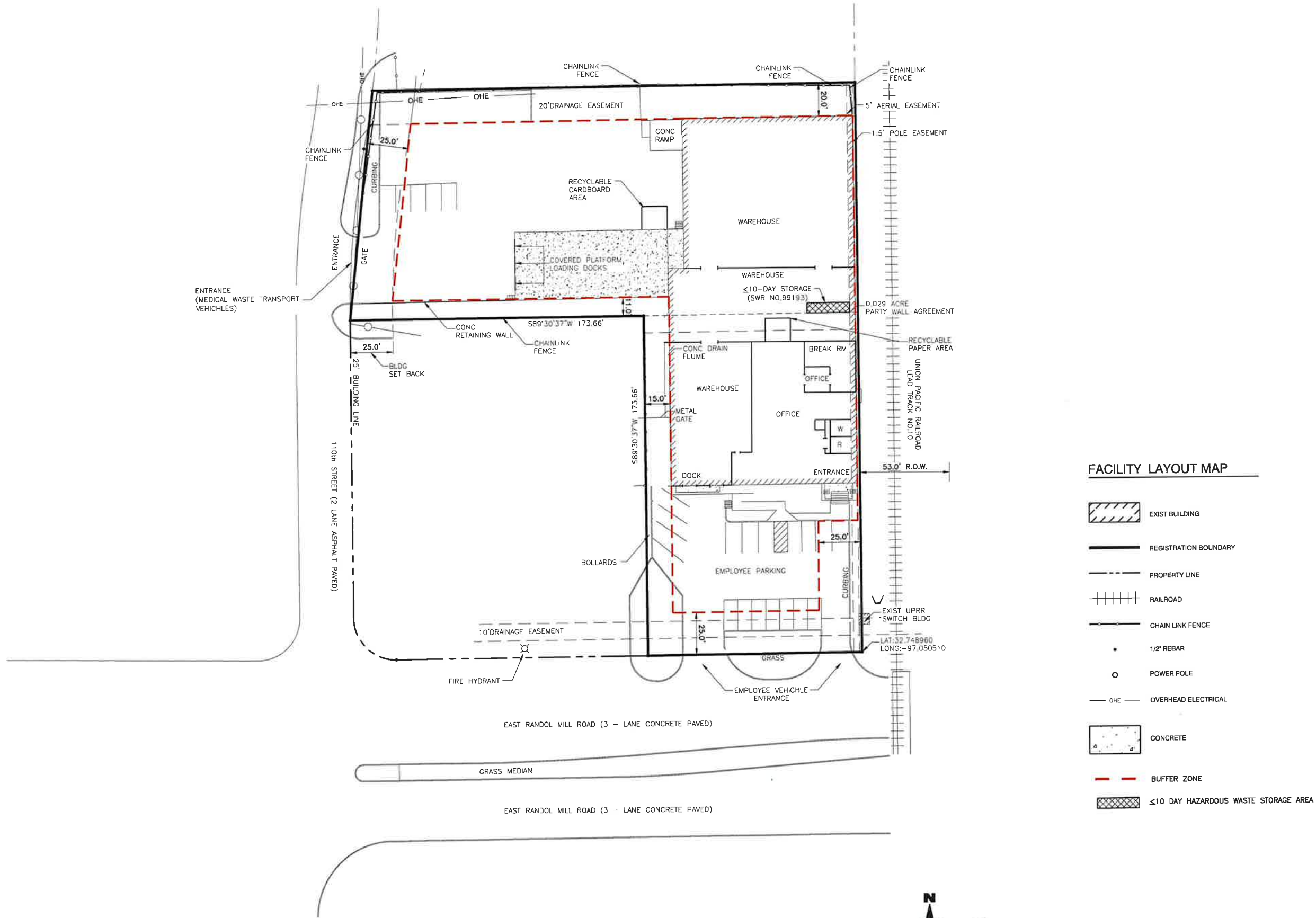
ATTACHMENT 2

FACILTY ACCESS AND LAYOUT MAP

U:\Daniels Health\2024-1853-00 TCEQ Registration-Arlington\000\90-Survey\EXHIBIT- ATT 2 FIG 1.dwg
Friday October 03, 2025, 11:30am

NOTES:

- THE ≤ 10 HAZARDOUS WASTE AREA IS FOR TEMPORARY STORAGE OF HAZARDOUS WASTE IN TRANSIT.
- FACILITY WILL INITIALLY OPERATE AS A TRANSFER AND STORAGE FACILITY. THIS FIGURE ILLUSTRATES THE FACILITY LAYOUT FOR WASTE TRANSFER AND STORAGE OPERATIONS.



THE SEAL APPEARING ON THIS DOCUMENT
WAS AUTHORIZED BY AMY REIN HESSELTINE,
P.E. NO. 83578 ON 10-3-25 ALTERATION OF A
SEALED DOCUMENT WITHOUT PROPER
NOTIFICATION TO THE RESPONSIBLE
ENGINEER IS AN OFFENSE UNDER THE TEXAS
ENGINEERING PRACTICE ACT.



10/3/25
Amy R Hesseltnie

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Corpus Christi, Texas 78408
Phone: (361) 883-1984
www.Ardurra.com
Engineering License #E-10053
Ardurra Group, Inc.
Surveying Firm 1019468
Architectural Firm BR4160



DANIELS ARLINGTON FACILITY
3221 E. RANDOL MILL RD.
ARLINGTON, TEXAS

**FACILITY LAYOUT MAP - WASTE TRANSFER
ATTACHMENT 2, FIGURE 1**

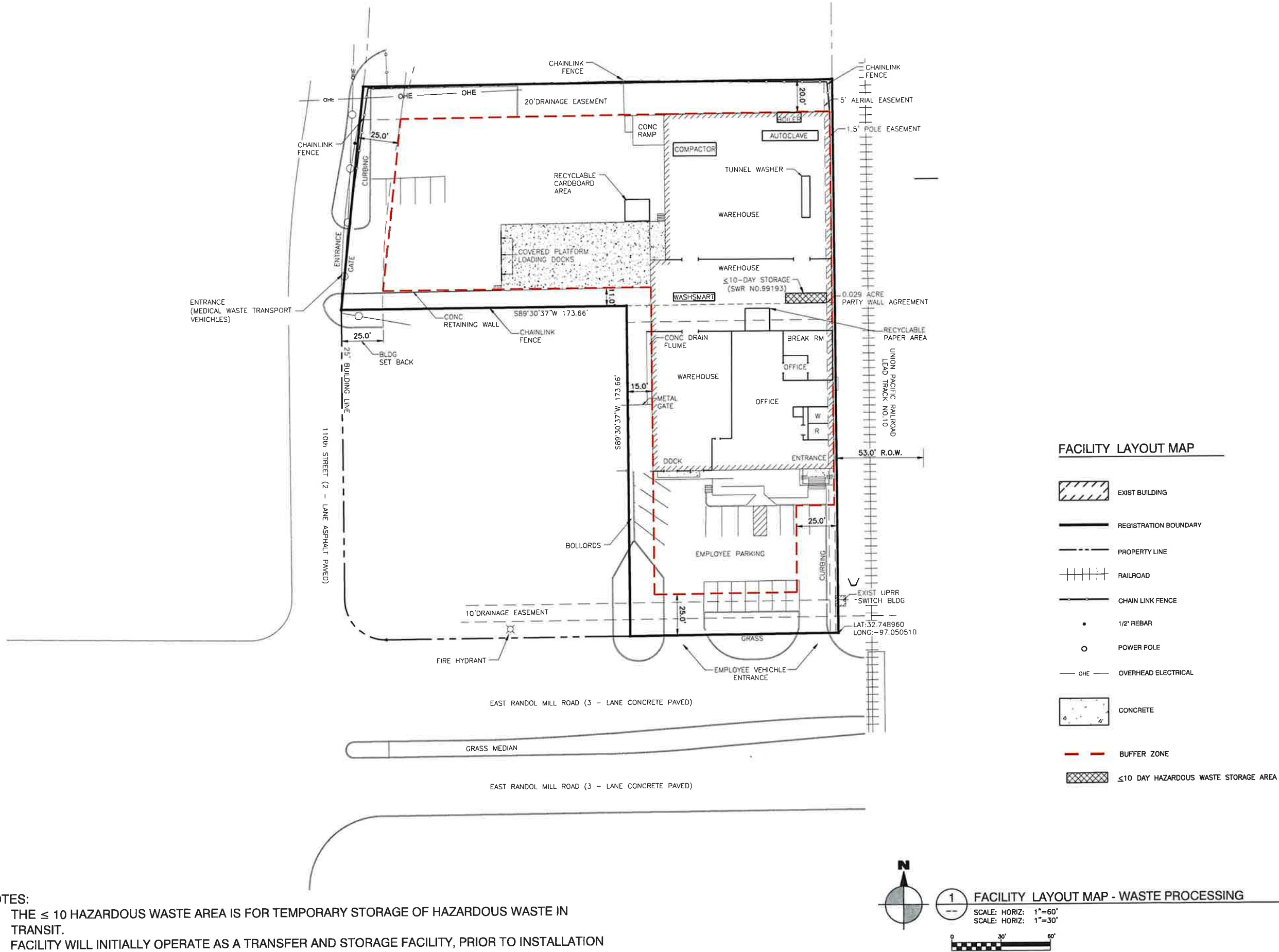
DATE:	10/3/25
DRAWN BY:	TSH/AA
CHECKED BY:	AH
APPROVED BY:	AH
JOB NO:	2024-1853-00

DATE	NO.	DESCRIPTION
10/25	2	ADD CALLOUTS
7/25	1	ADD RECYCLE AREAS

U:\Daniels Health\2024-1853-00 TCEQ Registration-Arlington\000\90-Survey\EXHIBIT- ATT 2 FIG 2.dwg
Friday October 03, 2025, 11:31am

NOTES:

1. THE ≤ 10 HAZARDOUS WASTE AREA IS FOR TEMPORARY STORAGE OF HAZARDOUS WASTE IN TRANSIT.
2. FACILITY WILL INITIALLY OPERATE AS A TRANSFER AND STORAGE FACILITY, PRIOR TO INSTALLATION OF WASTE PROCESSING EQUIPMENT.
3. THIS FIGURE ILLUSTRATES FACILITY LAYOUT FOR WASTE PROCESSING.



THE SEAL APPEARING ON THIS DOCUMENT
WAS AUTHORIZED BY AMY REIN HESSELTINE,
P.E. NO. 93578 ON 10-2-25. ALTERATION OF A
SEALED DOCUMENT WITHOUT PROPER
NOTIFICATION TO THE RESPONSIBLE
ENGINEER IS AN OFFENSE UNDER THE TEXAS
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Surveying Firm 10194688
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DANIELS ARLINGTON FACILITY
3221 E. RANDOL MILL RD.
ARLINGTON, TEXAS

**FACILITY LAYOUT MAP - WASTE PROCESSING
ATTACHMENT 2, FIGURE 2**

DATE: 10/3/25
DRAWN BY: TSH/AA
CHECKED BY: AH
APPROVED BY: AH
JOB NO: 2024-1853-00

REVISIONS		
NO.	DATE	DESCRIPTION
1075	2	ADD CALLOUTS
1076	1	ADD RECYCLE AREAS

ATTACHMENT 9

TEXAS DEPARTMENT OF TRANSPORTATION COORDINATION LETTERS



Fort Worth District
2501 SW Loop 820 | Fort Worth, Texas 76133
(817) 370-6500
txdot.gov

September 10, 2025

Ms. Amy R. Hesseltine, P.E.
ARDURRA GROUP, Inc
801 Navigation Blvd
Suite 300
Corpus Christi, TX 78408

Ref: Request for Coordination Letter for TCEQ, Daniels Arlington Facility, 3221 E.
Randol Mill Rd, Arlington, TX 76011

Dear Ms. Hesseltine,

We have reviewed your correspondence dated December 19, 2024. After completion of the necessary review processes, we find no reason to object to the application for establishing the transfer, storage and processing facility for regulated medical waste facility at 3221 E. Randol Mill Road, Arlington, Texas 76011.

Our review concluded the facility will not generate or substantially affect the traffic along the on-system roads in the area. All our on-system roads have been developed to the highest standards required for the traveling public as well as interstate commerce. The on-system roads located on the north, east and west side of the proposed site, were designed to accommodate the growing demand of the D/FW Metroplex traffic. These roads will accommodate the increasing volume, size and weight demand for the ever-increasing traffic demand. All on-system roads provide conveyance to one of the busiest areas within the D/FW Metroplex area. In addition, there are no regulations which affect any on-system roads or right-of-ways belonging to the Texas Department of Transportation within the area of the proposed facility. We, therefore, feel issuing this letter of coordination would be the best interest of the driving public and all concerned.

Sincerely,

Signed by:

B741E64FAD82411...

David Salazar, P.E.
District Engineer

CC: Maribel Rangel, P.E., Director of Maintenance

ATTACHMENT 2

PHOTOGRAPHS

3221 E. Randol Mill Rd

Southeast of property looking at driveway entrances across drainage easement along Randol Mill Rd and railroad easement along the east side of property.



Google Earth

© 2025 Google

3221 E. Randol Mill Rd

Northwest side of property looking at drainage easement across north side of property.



Google Earth

© 2025 Google

8.93 ft



ATTACHMENT 3

AUTOCLAVE CAPACITY DETERMINATION

RE: Response to NOD1

From Charles Rivera - [REDACTED]
Date Mon 8/4/2025 2:10 PM
To Kyle Little [REDACTED] Amy Hesseltine [REDACTED]

1 attachment (283 KB)
Waste trailer Specs.pdf;

Amy,

Attached are the waste trailer specs and the capacity of our autoclave.

Attached please find the capacity of our 8- cart Autoclave.

300 tons per week 60 tons per day.

Daniels Sharpsmart Arlington Autoclave Waste Capacity - 8 cart							
Days	1st shift		2nd shift		3rd shift		Max tons per day
	Tons	Cycles	Tons	Cycles	Tons	Cycles	
Monday	20	8	20	8	20	8	60
Tuesday	20	8	20	8	20	8	
Wednesday	20	8	20	8	20	8	
Thursday	20	8	20	8	20	8	
Friday	20	8	20	8	20	8	
Saturday							
Total Containers	100	40	100	40	100	40	
Three shift weekly capacity 5 days		300					
Current weekly usage Tons with Fresenius Phase 1		30					
capacity usage		10%					
Available capacity shift in 3 shifts%		-90%					

Regards

Charles Rivera
Regional Director of Operations
Daniels Health | United States

A. 10705 Rocket Blvd, Suite 109, Orlando, FL 32824
P. +1 -407-663-9959
E. [REDACTED]
W. [REDACTED]



From: Kyle Little [REDACTED]
Sent: Monday, August 4, 2025 3:06 PM
To: Amy Hesseltine [REDACTED]
Subject: FW: Response to NOD1