



December 19, 2025

Project No.: US0022880.8845

Texas Commission on Environmental Quality
MSW Permits Section, Waste Permits Division
P.O. Box 13087, MC-124
Austin, Texas 78711-3087

ATTN: Henok Tewelde, P.G.

**RESPONSE TO TCEQ NOTICE OF DEFICIENCY
INTERIM LEACHATE CONTAINMENT POND; PERMIT NO. MSW-692B
TEMPLE RECYCLING AND DISPOSAL FACILITY
BELL COUNTY, TEXAS
TRACKING NO. 32239041**

Dear Mr. Tewelde:

On behalf of the City of Temple, WSP USA Inc. (WSP) submits this response to the Texas Commission on Environmental Quality's (TCEQ's) Notice of Deficiency (NOD) regarding the above-referenced Municipal Solid Waste Permit Modification (PM). TCEQ's NOD letter was dated on December 3, 2025.

The responses presented herein are cross-referenced to the NOD comments using the comment numbers in the NOD and quoting the original comments. We have also included an itemized list of the revised or new PM pages.

One original and one (1) copy of the revised Permit Modification materials and one (1) copy of the redline-strikeout revisions are included with this letter. The redline-strikeout revisions are organized per the order of the NOD comments. This response package will be posted to a publicly accessible website as indicated in the TCEQ form 20650.

We trust this response is sufficient to address the deficiencies identified by TCEQ. Upon review of this response, if you have questions, please contact the undersigned at 281-589-5900.

Sincerely,

WSP USA INC.

*Keshab Gyawali, PE
Lead Consultant, Civil Engineer*



*Chad E. Ireland, PE
Assistant Vice President, Geological Engineer
Waste Facility Engineering Team Leader
Civil, Ground Engineering & Material Service Line Leader*

cc: Don Bond - Public Works Director (City of Temple)
Charles Rivette- Director of Planning and Project Development (USA Waste)
Jayson Lang, PE – Texas Oklahoma Market Area Engineer (USA Waste)
Chad E. Ireland, PE – Lead Consultant and Waste Services Industry Group Leader (WSP)

LIST OF REVISED/NEW PAGES

Part	Revised/New Pages
Part I	<ul style="list-style-type: none">■ Page 1 of the TCEQ form 20650■ Revised Section 6 of the form TCEQ-20650■ Revised Section 8 of the form TCEQ-20650■ Revised Section 11 of the form TCEQ-20650
Part III	<ul style="list-style-type: none">■ Part III, Attachment 7<ul style="list-style-type: none">● Revised Appendix III-7-8 (revised cover page, revised text pages – replace page only).

PART I

Comment 1. Please provide the name, title, and email address of the individual responsible for sending notices as specified in Section 6 of the form TCEQ-20650.

Response 1. Included in Section 6 of the form TCEQ-20650.

Comment 2. A Please complete the contact's name and title of the facility general information in Section 8 of the form TCEQ-20650.

Response 2. Included in Section 8 of the form TCEQ-20650.

Comment 3. The permit modification detailed on page III-7-8, bullet five of the closure plans indicates that the procedures for ending the post-closure care period do not include the requirement of the executive director's approval, as outlined in 30 TAC §330.463(b)(B). Revise to include this statement in the documentation

Response 3. The sentence "Leachate management activities will be stopped after demonstrating to the executive director that leachate no longer poses a threat to human health and environment" as outlined on 30 TAC §330.463(b)(B)" is added on page III-7-8.

Comment 4. There is no statement, as required by [§330.59\(c\)\(3\)\(B\)](#), either including all mineral interest ownership or indicating that no mineral interest ownership exists at the facility property.

Response 4. This requirement is already addressed in TCEQ Permit MSW-692B Part I, page 1-6, Section 3.2



Texas Commission on Environmental Quality

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

Application Tracking Information

Facility Name: Temple Recycling and Disposal Facility

Permittee or Registrant Name: Waste Management of Texas Inc. / City of Temple

MSW Authorization Number: 692B

Initial Submission Date: October 27, 2025

Revision Date: December 19, 2025

Instructions for completing this form are provided in [form TCEQ-20650-instr](#)¹. 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
<input type="checkbox"/> Initial Submission <input checked="" type="checkbox"/> Notice of Deficiency (NOD) Response
2. Authorization Type
<input checked="" type="checkbox"/> Permit <input type="checkbox"/> Registration
3. Application Type
<input checked="" type="checkbox"/> Modification with Public Notice <input type="checkbox"/> Modification without Public Notice <input type="checkbox"/> Temporary Authorization (TA) <input type="checkbox"/> Modification for Name Change or Transfer
4. Application Fee
<p>Amount</p> <p>The application fee for a modification or temporary authorization is \$150.</p> <p>Payment Method</p> <input type="checkbox"/> Check <input checked="" type="checkbox"/> Online through ePay portal www3.tceq.texas.gov/epay/ If paid online, enter ePay Trace Number: XXXXXXXXXX

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

5. Electronic Versions of Application

For modifications that require notice, TCEQ will publish electronic versions of the application online. Applicants must provide a clean copy of the administratively complete application and technically complete application. TCEQ will also publish electronic versions of NOD responses online. <https://www.wm.com/wm/permits-texas/permits.jsp>

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: Chad E. Ireland, PE

Title: Assistant Vice President Geological Engineer

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: Temple Recycling and Disposal Facility (Temple RDF)

Contact Name: Andy Vance Title: WM Environmental Protections Manager

MSW Authorization Number (if existing): 692B

Regulated Entity Reference Number: **RN** 100219401

Physical or Street Address: 706 Landfill Rd

City: Temple County: Bell State: TX Zip Code: 76501

Phone Number: (832) 771-6377

Latitude (Degrees, Minutes, Seconds): N 31° 04' 36.360"

Longitude (Degrees, Minutes, Seconds): W 97° 18' 15.393"

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:

Minor permit amendment for an Interim Leachate Containment Pond within the currently permitted waste footprint of an existing facility

11. Facility Contact Information

Site Operator (Permittee or Registrant)

Name: City of Temple

Customer Reference Number: **CN** 600245799

Contact Name: Don Bond Title: Public Works Director

Mailing Address: 3210 East Avenue H, Bldg A

City: Temple County: Bell State: TX Zip Code: 76501

Phone Number: (254) 298-5000

Email Address: [REDACTED]

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

Operator (if different from Site Operator)

Name: Waste Management of Texas, Inc.

Customer Reference Number: **CN** 603572132

Contact Name: Steve Jacobs Title: _____

Mailing Address: 9807 Giles Road

City: Austin County: Travis State: TX Zip Code: 78754

Phone Number: (512) 272-6261

Email Address: [REDACTED]

Texas Secretary of State (SOS) Filing Number: 0022300000

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: _____ Title: _____

Email Address: _____

Signature: _____ Date: _____

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 _____

On this ____ day of _____, ____

My commission expires on the ____ day of _____, ____

Notary Public in and for

_____ County, Texas

Note: Application Must Bear Signature and Seal of Notary Public

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	A
Unmarked Revised Pages	B

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
<input type="checkbox"/> TCEQ Core Data Form(s)	N/A
<input type="checkbox"/> Signatory Authority Delegation	B
<input type="checkbox"/> Fee Payment Receipt	N/A
<input type="checkbox"/> Confidential Documents	N/A

PART III, ATTACHMENT 7

CLOSURE PLAN

Temple Recycling & Disposal Facility

Temple, Bell County, Texas

TCEQ Permit MSW-692B

Owner/Site Operator/Permittee:



City of Temple
201 N. Main
Temple, Texas 76501

Chad E. Ireland



WSP USA INC.
Professional Engineering Firm
Registration Number F-2263

Operator:



Waste Management of Texas
9708 Giles Lane
Austin, Texas 78781

**INTENDED FOR PERMITTING
PURPOSES ONLY**

Submitted By:

WSP USA Inc.
9655 Katy Freeway, Suite 200
Houston, TX 77024 USA
Professional Engineering Firm Registration Number F-2578

Submitted: June 2016
Revised: January 2017
Revised: April 2017
Revised: September 2024
Revised: October 2025
Revised: December 2025

Project No. US0022880.8845

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Figure III-7-4	Maximum Closure Area



WSP USA Inc.
Professional Engineering Firm
Registration Number F-2263

**INTENDED FOR PERMITTING
 PURPOSES ONLY**

List of Appendices

Appendix III-7A	Final Cover Quality Control Plan
Appendix III-7B	TCEQ Closure Plan Form
Appendix III-7C	TNRCC Final Cover Acceptance Letter for Tracts 1A and 1B
Appendix III-7D	TCEQ Final Cover System Evaluation Report Approval Letters

6.0 CLOSURE OF STORAGE AND PROCESSING UNITS

Closure for the storage and processing units at the site is addressed as follows:

- Liquid waste stabilization area: Upon closure, the waste remaining in the stabilization tank will be properly stabilized and disposed of in the landfill. The stabilization tank will be disposed of within the landfill.
- Tire staging area: At time of closure, tires in the staging area will be processed by grinding or other means to reduce size to quartered or split and disposed of in the landfill or another authorized facility.
- Large Item/White Goods Storage Area: Large items/white goods stored on-site at time of closure will be either transported offsite for recycling or disposed of at an authorized facility.
- Recyclable material staging area: Recyclable materials will transported off-site for to recyclable material end user locations.

Leachate evaporation ponds: The leachate evaporation ponds will remain in use during the post-closure care period. At the end of the post-closure care period, the leachate evaporation ponds will be closed as follows: empty the ponds by discharging the leachate to the sanitary sewer system via existing piping and pumping system; demuck the bottom of the ponds and dispose of the materials at an authorized facility; pressure wash the geomembrane liner and the metal parts of Pond A and discharge the cleaning water to an authorized facility; remove the geomembrane liner and the metal parts of Pond A and dispose of the material at an authorized facility; inspect the subgrade below the geomembrane liner; backfill the ponds with soils; and grade and seed the surface. Leachate management activities will stopped after demonstrating to the executive director that leachate no longer poses a threat to human health and environment.

- Citizen Collection Station: Upon closure, waste remaining at the Citizen Collection Station will be transported to the landfill disposal area for disposal. The Citizen Collection Station will either be dismantled or a "Notice of Intent to Operate a Citizen's Collection Station" will be submitted to TCEQ.

3.0 MAPS

3.1 General Location Maps

The following maps collectively comply with the requirements of 30 TAC §330.59(c)(1) & (2) and §305.45. These general locations maps are included in Appendix IA – General Location Maps:

- Figure I-A-1 – General Highway Map
- Figure I-A-2 – Site Location Map
- Figure I-A-3 – General Topographic Map
- Figure I-A-4 – Aerial Photograph
- Figure I-A-5 – General Site Plan

A Land Use Map is also included as Drawing 3 in Part II, Appendix IIB, Land Use Study.

3.2 Land Ownership Map and Land Owners List

A Land Ownership Map and Land Owners List are included in Appendix IB and reflect property ownership within one-quarter mile of the permit boundary. No mineral interest ownerships under the facility were identified. The map and list meet the requirements of 30 TAC §305.45(a), §330.59(c)(3), and §281.5. The list is also to be provided in electronic format on an enclosed CD per the requirements of 30 TAC §330.59(c)(3)(B).