Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: 5/2025
Facility Name: City of Grand Prairie Landfill
Permit or Registration No.: 996C

Nature of Correspondence:
☐ Initial/New
☒ Response/Revision to TCEQ Tracking No.: 30885014 (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:	

Weaver Consultants Group

May 2, 2025
Project No. 0628-001-11-78-01

Corbin Solt
MC-124
Municipal Solid Waste Permits Section
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

Re: Response to Notice of Deficiency Email
Permit Modification – VERDac Bale / VERDac Pellets Spray-on Alternative Daily Cover
City of Grand Prairie Landfill – TCEQ Permit No. MSW-996C
Dallas County, Texas
Tracking No. 30885014, RN100542216/CN600253967

Dear Mr. Solt:

On behalf of the City of Grand Prairie, please find enclosed one original and one copy of the revised permit modification request to use VERDac Bale and VERDac Pellets spray-on alternative daily cover (ADC) at the City of Grand Prairie Landfill on a permanent basis. The attached revised modification was developed to incorporate responses to comments in your email dated April 25, 2025. Additionally, an email containing this submittal was sent to [redacted]

A detailed response to each of the TCEQ comments follows:

1. **Incorporating a new alternate daily cover (ADC) into a permit on a permanent basis requires a modification with public notice in accordance with 305.70(k)(1). Please resubmit TCEQ Form-20650 marked as a "Modification with Public Notice" as required and provide all required attachments for a modification with notice.**

Response:

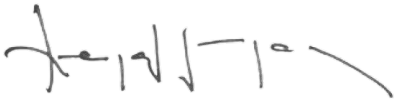
Form-20650 has been updated to indicate this is a "Modification with Public Notice". In addition, Appendix E has been added which contains the Adjacent Landowners Information. The regulatory reference on Page 7 (Section 5) of the Alternative Daily Cover Operating Plan pertaining to the type of permit modification to be submitted has also been updated.

This permit modification has been prepared as replacement pages to the currently approved Part IV – Site Operating Plan, as discussed in the attached permit modification narrative. This permit modification is being submitted in accordance with Title 30 Texas Administrative Code (30 TAC) §305.70(k)(1). This rule allows for the use of an ADC material on a permanent basis in accordance with §330.165(d). A section of the attached permit modification.

A copy of this permit modification has been provided to the appropriate regional office. A copy of this submittal was also placed in the site operating record for this facility. TCEQ Form 20650 is included in Appendix C of the attached permit modification. In accordance with 30 TAC §330.59(h)(2), a $150.00 application fee has been submitted to TCEQ, as documented on page 1 of Form 20650.

During the course of your review, if you need additional information or have any questions, please call.

Sincerely,
Weaver Consultants Group, LLC



Nevzat Turan, P.E.
Principal

Attachment: Permit Modification – VERDac Bale / VERDac Pellets Spray-on Alternative Daily Cover

cc: TCEQ Region 4 Office
Patricia D. B. Redfearn, PhD., City of Grand Prairie

CITY OF GRAND PRAIRIE LANDFILL
DALLAS COUNTY, TEXAS
TCEQ PERMIT NO. MSW-996C

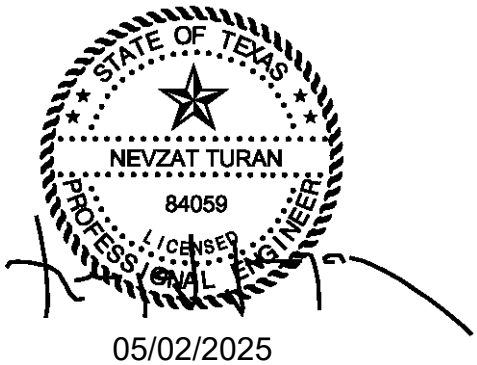
PERMIT MODIFICATION

VERDac BALE / VERDac PELLETS SPRAY-ON ALTERNATIVE DAILY COVER

Prepared for

City of Grand Prairie

May 2025



05/02/2025

Prepared by

Weaver Consultants Group, LLC
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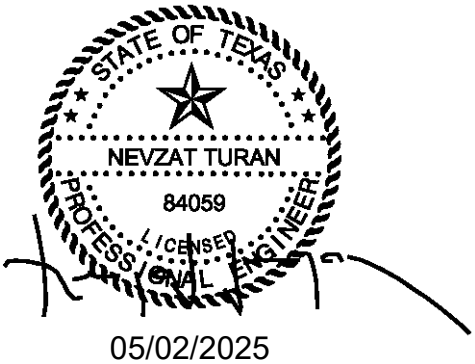
6420 Southwest Boulevard, Suite 206
Fort Worth, Texas 76109
817-735-9770

WCG Project No. 0628-001-11-78-01

CONTENTS



05/02/2025

PERMIT MODIFICATION NARRATIVE

Permit Modification Justification

The purpose of this permit modification is to request the use of VERDac Bale and VERDac Pellets spray-on alternative daily cover (ADC) at the City of Grand Prairie Landfill on a permanent basis. As noted in the status reports submitted to the Texas Commission on Environmental Quality (TCEQ) during each material's trial period, the VERDac Bale and VERDac Pellets spray-on ADC have been used effectively at the site to control vectors, fires, odors, and windblown waste. As requested in Temporary Authorization (TA) Condition 7 of the July 18, 2023 approval letter for VERDac Pellets, the ADC evaluation period covered four seasons of use. As requested in Temporary Authorization Condition 6 of the March 25, 2024 approval letter for VERDac Bale, the ADC evaluation period covered four seasons of use.

The facility is currently authorized to use spray-type ADC material (BioCover approved by TCEQ on May 23, 2003 and Quick Cover/Quick Cover LT approved by TCEQ on August 28, 2019). This permit modification requests to add two VERDac ADC materials which are very similar (variation of the same chemical makeup) to the currently approved spray-on ADC materials. VERDac Pellets successfully completed the one-year demonstration period, and VERDac Bale is currently finishing up the second 180-day trial period, which ends on April 5, 2025.

Given that the proposed changes are minor in nature and do not substantially alter the permit conditions or reduce the capability of the facility to protect human health or the environment, it is requested that this permit modification be processed under the provisions of Title 30 Texas Administrative Code (TAC) §305.70(k)(1). This rule allows for the use of an ADC material on a permanent basis in accordance with §330.165(d).

Replacement Pages

The redline strikeout version of the replacement pages is included in Appendix A. An unmarked version of applicable replacement pages is included in Appendix B. The following table summarizes the replacement pages contained within this permit modification.

Summary of Replacement Pages

Item	Explanation
Part IV – Site Operating Plan (SOP) – Cover	Updated revision date.
Part IV, SOP, Appendix IVB – Alternative Daily Cover Operating Plan Information – Cover	Updated revision date.
Part IV, SOP, Appendix IVB, ADC Summary - Page IVB-1	Included VERDac Bale / VERDac Pellets as approved ADC materials. Updated regulatory references and text concerning trial period.
Part IV, SOP, Appendix IVB, Alternative Daily Cover Operating Plan (ADCOP) – Cover	Updated revision date.
Part IV, SOP, Appendix IVB, ADCOP, Contents - Page ii	Added Appendix G to include SDS for VERDac Bale / VERDac Pellets.
Part IV, SOP, Appendix IVB, ADCOP – Page 1	Updated regulatory reference and SDS abbreviation.
Part IV, SOP, Appendix IVB, ADCOP, Sections 2.1, 2.2, 3.3, and 5 - Pages 3, 4, 5, and 7	Included VERDac Bale / VERDac Pellets ADC materials. Updated regulatory reference and trial period. Added additional operation steps for Spray-Type ADCs.
Part IV, SOP, Appendix IVB, ADCOP, Appendix G (new)	Included SDS for VERDac Bale / VERDac Pellets.

TA Approvals

TCEQ issued the VERDac Pellets ADC TA to the City of Grand Prairie Landfill on July 18, 2023, and approved a 180-day extension of the TA on February 2, 2024. Copies of these approval letters are provided in Appendix C. At the end of the 180-day extension, the City of Grand Prairie Landfill ceased using VERDac Pellets as ADC until a permit modification was obtained. The City submitted bimonthly status reports to TCEQ during the length of the ADC trial period.

TCEQ issued the VERDac Bale ADC TA to the site on March 25, 2025, and approved a 180-day extension of the TA on October 7, 2024. Copies of these approval letters are provided in Appendix C. At the end of the 180-day trial period extension, the site cannot continue using VERDac Bale as ADC until this permit modification approval is obtained. The City is continuing to submit bimonthly status reports to TCEQ during the length of this ADC trial period.

TCEQ Form 20650

The TCEQ Form 20650 is provided in Appendix C. In accordance with §330.59(h)(2), a payment of $150 has been made online through the TCEQ ePay system as noted on page 1 of the TCEQ Form 20650.

APPENDIX A

REPLACEMENT PAGES
WITH REDLINE STRIKEOUT

CITY OF GRAND PRAIRIE LANDFILL
DALLAS COUNTY, TEXAS
TCEQ PERMIT NO. MSW-996C

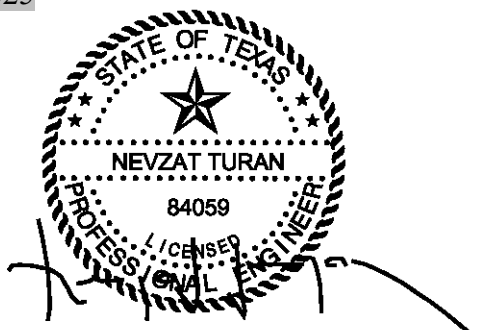
PART IV – SITE OPERATING PLAN

Prepared for

City of Grand Prairie

Approved October 31, 2006
Revised March 2010
Revised November 2015
Revised February 2018
Revised June 2019

Revised May 2025



05/02/2025

Prepared by

Weaver Consultants Group, LLC
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817-735-9770

WCG Project No. 0628-001-11-78

CITY OF GRAND PRAIRIE LANDFILL
DALLAS COUNTY, TEXAS
TCEQ PERMIT NO. MSW-996C

PART IV – SITE OPERATING PLAN

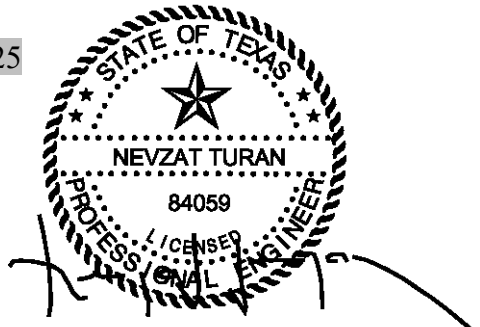
APPENDIX IVB
ALTERNATIVE DAILY COVER OPERATING PLAN INFORMATION

Prepared for

City of Grand Prairie

Approved October 31, 2006
Revised February 2018
Revised June 2019

Revised May 2025



Prepared by

05/02/2025

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WCG Project No. 0628-001-11-78

ADC SUMMARY

The site is currently approved to use the following types of ADC.

- Durashield 12000
- BioCover
- Quick Cover/Quick Cover LT
- VERDac Bale / VERDac Pellets
- Refiber
- Waste Cover
- Proguard SB
- Wood chips/soil

Consistent with §330.~~133(c)~~165(d), a temporary authorization will be submitted for any additional future ADC materials. Consistent with 30 TAC 330.~~133(c)~~165(d)(2), after a Temporary Authorization to use a new ADC material is approved, a status report for the new ADC materials will be submitted on a two-month basis to the TCEQ describing the effectiveness of the alternative materials, any problems that may have occurred, and corrective actions required as a result of such problems. The trial period will be for two 180-day periods with an extension request to be submitted near the end of the first 180-day period. If no unresolved problems occur within ~~six months of use, status reports may no longer be required and the site will submit~~ the trial period, a permit modification ~~per~~ consistent with §305.70(k)(1) will be submitted to the TCEQ to obtain permanent approval of the ADC material.

The procedure listed above replaces the text in the currently approved ADCOP which discussed status reports (i.e., Section 5).

CITY OF GRAND PRAIRIE LANDFILL
DALLAS COUNTY, TEXAS
TCEQ PERMIT NO. MSW-996C

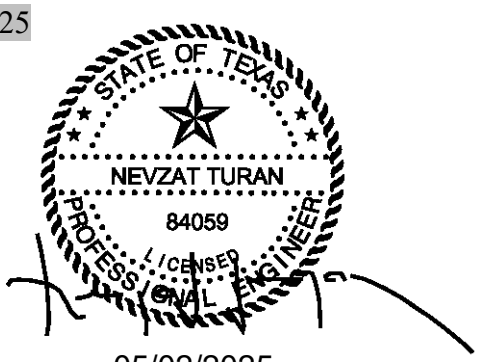
ALTERNATIVE DAILY COVER OPERATING PLAN

Prepared for

City of Grand Prairie

October 2002
Revised February 2003
Revised February 2018
Revised June 2019

Revised May 2025



Prepared by 05/02/2025

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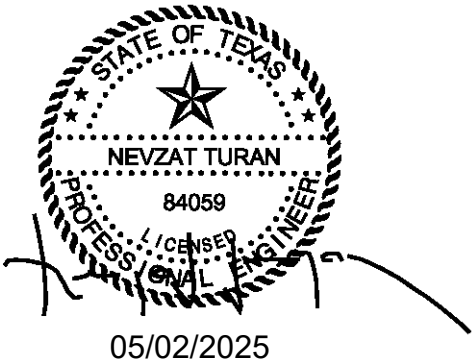


05/02/2025

1 INTRODUCTION

This Alternate Daily Cover Operating Plan (ADCOP) has been prepared for the City of Grand Prairie Landfill consistent with §330.~~133(c)~~165(d)(1). The purpose of this ADCOP is to address the following issues:

- Description and thickness of each ADC material
- Chemical composition of the material and the ~~M~~SDS(s) for the ADC (if applicable)
- Operation methods to be utilized at the site when using the ADC
- Effect of the ADC on vectors, fires, odors, and windblown litter

As specified in the Site Operating Plan (SOP) – Daily Cover, ADC may be used to cover exposed waste except when the landfill is to be closed for a period of greater than 24 hours (unless otherwise approved by the TCEQ).

from 0 to 50 percent. The wood chips are produced at the facility and have a nominal size of 2 inches and a maximum size of 6 inches. The remaining portion of the mixture would consist of clean soil.

- Quick Cover / Quick Cover LT. Quick Cover, produced by Tascon, Inc., and Quick Cover LT, produced by Applegate Colorado, LLC, spray-type alternative daily cover (ADC) materials share the same chemical and physical characteristics (i.e., same SDS). The only difference between these two products is that Quick Cover contains added moisture and dye prior to shipment and Quick Cover LT is shipped without adding moisture (i.e., a dry version of the product) and dye (a small packet of dye is shipped with each bag). Once either of the products is mixed with water (e.g., hydromulch machine ADC preparation tank) the resulting product that is applied as ADC is the same. Quick Cover/Quick Cover LT is a blend of cellulose fiber mulch and a binding agent that forms a slurry when mixed with water. The mulch is manufactured from recycled fiber stock (mixed papers) and the binding agent is composed of guar gum powder and applied with a hydromulch machine. This ADC spray material will form a crust-like barrier after application. Additional information is included in Appendix F.
- VERDac Landfill Cover Bale (VERDac Bale) spray-on ADC, produced by LSC Environmental Products, LLC., is a blend of wood fiber and paper fiber, sodium montmorillonite clay, proprietary ingredients (Posi-Shell® mineral binders), and biodegradable blue/green dye that forms a slurry when mixed with water. The bales are manufactured from thermally refined and debarked wood fiber and clean recycled paper. The slurry made using VERDac Bale is applied with a hydromulch machine. VERDac Bale slurry will form a crust-like barrier on the surface of the waste after application. The SDS for VERDac Bale (prior to mixing with water) is provided in Appendix G.
- VERDac Landfill Cover Pellets (VERDac Pellets) spray-on ADC, produced by LSC Environmental Products, LLC. is a blend of cellulose and corn fiber, sodium montmorillonite clay, proprietary ingredients, and biodegradable green coloring that forms a slurry when mixed with water. The mulch is manufactured from recycled fiber stock (mixed papers). The slurry made using VERDac Pellets is applied with a hydromulch machine. VERDac Pellets slurry will form a crust-like barrier on the surface of the waste after application. The SDS for VERDac Pellets (prior to mixing with water) is provided in Appendix G.

2.2 Chemical Characteristics of Synthetic ADC Materials

Chemical characteristics of synthetic ADC materials (e.g., DuraShield 12000, BioCover, Quick Cover/Quick Cover LT, VERDac Bale/VERDac Pellets, Refiber, Waste-Cover, and ProGuard SB) are included in Appendix A through Appendix ~~F~~G. Each of the synthetic ADC materials are not reactive, ignitable, or corrosive under the expected conditions (e.g., high temperature~~s~~ seasons, intense sunlight).

3 OPERATIONAL METHODS

3.1 Introduction

The following subsections discuss the operational procedures that will be used to employ the approved ADC materials. In general, for each type of ADC, site personnel will verify that the waste fill area has been covered with the minimum required thickness at the completion of each working day. The type of ADC (tarp or spray) will be determined by the landfill general manager. The decision will generally be based on the availability of materials and weather conditions. However, the conditions of the equipment and the personnel needs on any given workday may also determine the type of ADC used.

3.2 Tarp ADC Materials

The DURASHIELD material will be deployed as follows:

- Panels of ADC material will be pulled over the working face.
- The perimeter of the tarps will be anchored approximately every 20 feet with tires, dirt, sandbags, or similar material to keep the tarp in-place and prevent vector intrusion.
- The tarps will be removed the following morning by pulling the tarps across themselves to reduce drag. The tarps will be stored in an inactive area.
- Site personnel will utilize appropriate protective gear, including gloves, boots, and masks, as necessary when handling the tarp ADC.

3.3 Spray-Type ADCs

The spray-type ADCs included in this plan are BioCover, Quick Cover/Quick Cover LT, VERDac Bale / VERDac Pellets, Refiber, Waste-Cover, and ProGuard SB. Each material will be handled similarly. The material will be applied to the working face using a FINN T90 (900-gallon capacity) or similar equipment following the procedure listed below.

1. The operator will become familiar with this ADCOP and the ~~M~~SDS ~~sheet on~~ for the ADC product to be used before operating the hydroseed machine for ADC, specifically the mixing ratio and application rate. The manufacturer's instructions included with the ADC material should also be followed.

2. The operator will not operate the hydroseed machine until he has been trained by qualified personnel in the operation of the equipment, mixing procedures, and application methods.

3. The operator will mix the spray ADC according to the manufacturer's recommendation; therefore, the documentation from the manufacturer regarding product handling and mixing ratios will be kept in the site operating record. Then, using the hydroseed machine, the operator will apply the ADC from at least two different directions to achieve an overall thickness of approximately 0.25 inches over the exposed waste at the working face. The operator will visually inspect the ADC to ensure the minimum thickness is achieved and no waste is left exposed.

4. The operator will not prepare ADC slurry around or near ignition sources. Mixing of ADC material with water will be performed either in an open area or a well-ventilated enclosed structure. The operator will observe dust during mixing and take necessary precautions (e.g., pouring bags onto mixing water from a close distance) to minimize dust generation.

5. The operator will store ADC material in a dry location that is not susceptible to water ponding. The ADC material will be tarp covered if stored outside to prevent pre-hydration that may cause damage to the bags. If the ADC material is stored in an enclosed structure, the operator will ensure the structure is well-ventilated and any damaged bags removed.

6. Prior to the application of ADC material, the operator will ensure that containment berms around the ADC application area are installed in accordance with Attachment 15 (Appendix 15C and Attachment 15, Section 4.2) and stormwater is managed per Attachment 15 and Sections 4.19 and 4.21 of the SOP.

3.4 Soil-Like ADC Materials

The wood chips/soil mixture will behave similar to a soil-only daily cover. The material will be stockpiled near the working face and spread over the working face with a dozer or similar equipment to a minimum 6-inch thickness. Additionally, clean soil will be added as necessary to ensure appropriate thickness is applied. This wood chip/soil mixture could be used as daily cover for up to 180 days, similar to the requirements for soil daily cover.

Given that the wood chips will be mixed with soil, with a average natural moisture content, it is expected that the wood chip/soil mixture will also be resistant to potential fires. Additionally, the existence of fibrous chips in this mixture increases the shear strength of the cover material so that in turn minimizes water erosion.

5 STATUS REPORTS

Consistent with 30 TAC §330.~~133(c)~~165(d)(2), a status report on the new ADC materials will be submitted on a ~~quarterly~~bimonthly basis to the TCEQ describing the effectiveness of the alternative materials, any problems that may have occurred, and corrective actions required as a result of such problems (see table below). The status report will also include an assessment of how the Soil-like ADC material is functioning in those areas where it is left exposed for periods more than 24 hours. The trial period will be for two-180-day periods with an extension request to be submitted near the end of the first 180-day period. If no unresolved problems occur within ~~four consecutive quarters of use, status reports will no longer be required~~the trial period, a permit modification under 30 TAC §305.70(k)(1) will be submitted to TCEQ to use the ADC materials on a permanent basis.

ADC Material	Type	Status Report Required
Durashield 12000	Tarp	Yes
BioCover	Spray-On	No[1]
Quick Cover / Quick Cover LT	Spray-On	No[1]
VERDac Bale / VERDac Pellets	Spray-On	No[1]
Refiber	Spray-On	No[1]
Waste-Cover	Spray-On	Yes
ProGuard SB	Spray-On	Yes
Wood Chips / Soil	Soil-Like	Yes

[1]ADC Material is currently permitted and approved for use: Bimonthly status reports have previously been submitted; therefore, no bimonthly status reports will be required for this ADC Material. Quick Cover/Quick Cover LT has gone through a demonstration period between June 2018 and May 2019. VERDac Pellets went through a demonstration period between August 2023 and July 2024. VERDac Bale went through a demonstration period between April 2024 and March 2025. ~~Status reports have previously been submitted, therefore, no status reports will be required for this ADC Material.~~

APPENDIX G

VERDAC BALE / VERDAC PELLETS

GHS Safety Data Sheet SDS

LSC Environmental Products, LLC
Issue Date: January 31, 2024

1 Identification

Supplier LSC Environmental Products, LLC
2183 Pennsylvania Ave
Apalachin, NY 13732
Telephone: 607-625-3050
Fax: 607-625-2688
Web: www.lscenv.com

Product Name **VERDac Landfill Cover Bale**
Description: Blue/Green dyed Wood Fiber and Paper Fiber, and Sodium Montmorillonite Clay with Additives
CAS Number: N/A
Recommended Use: Landfill Alternative Daily Cover and Hydroseeding.

2 Hazards Identification

Route of Entry: Eye Contact, Skin Contact, Inhalation

Hazards:
- Eye: May cause mechanical irritation. Wood dust can irritate the eyes.
- Skin: May cause drying resulting in dermatitis. Wood dust can cause irritation.
- Ingestion: No reports of human ingestion.
- Inhalation: Acute: Short term exposure may cause mechanical irritation resulting in dry cough. May aggravate existing respiratory illness. Chronic:Repeated inhalation of respirable* crystalline silica above exposure limits can cause lung disease, including silicosis and lung cancer.

OSHA Classification: Wood dust is a hazardous substance as defined by the Hazardous Communication Standard 29CFR 1910.1200

3 Composition / Information on Ingredients

Component	CAS#	Amount
Wood-Debarked whole	N/A	70%
Clean Recycled Paper	N/A	25%
Sodium Montmorillonite Clay (SMC)*	1318-93-0	5%

*Typical western SMC contains 1-6% crystalline silica as quartz CAS# 14808-60-7.

4 First-Aid Measures

Eye: Flush eyes and under eye lids with plenty of water until irritation ceases. Contact physician if irritation persists.

Skin: Wash with soap and water until clean. Contact physician if irritation develops.

Ingestion: None known.
Inhalation: Move to area free from dust. If symptoms of irritation persist, contact physician. Inhalation may aggravate existing respiratory illness.

5 Fire Fighting Measures

Flammability: Combustible product
Auto-ignition Temp: 400-500 F
Fire Extinguishing Media: Water, Carbon Dioxide, Sand.

6 Accidental Release Measures

Personal Precaution: Avoid breathing dust; wear respirator approved for silica bearing dust.
Cleanup: Vacuum to avoid generating airborne dust. Avoid using water. Material becomes slippery when wet.

7 Handling and Storage

Handling: Use NIOSH/MSHA respirators approved for silica bearing dust when airborne SMC dust levels exceed PEL/TLVs. Clean up spills promptly to avoid making dust. Storage area floors may become slippery if wetted.
Storage: Store in a dry place. Keep away from ignition sources.

8 Exposure Controls / Personal Protection

Exposure Guidelines (Inhalation):

Component	OSHA PEL (8 hr TWA)	ACGIH TVL
Crystalline Silica as Quartz	0.1 mg/m^3	0.1 mg/m^3
Wood Dust	1 mg/m^3	1 mg/m^3
Particles Not Otherwise Regulated		
Total Dust	15 mg/m^3	N/A
Respirable Dust	5 mg/m^3	N/A

Engineering Controls: None required for outdoor mixing and application. Use local ventilation to maintain PELs/TLVs if handling indoors.

Personal Protective Equipment:

Eye and Face Protection: Wear safety glasses or goggles during loading and application to protect from dust, splashing, and spray mist.

Skin Protection: Wear gloves and overalls to protect skin and clothing from contact with product. Personal hygiene measures,

such as washing hands and face after working with materials, are recommended.

Respiratory Protection: When handling generates dust levels above exposure limits, use respirators approved by NIOSH/MSHA for silica bearing dust.

9 Physical and Chemical Properties

Appearance:	Dyed green/blue wood fibers.
Odor:	Slightly woody
pH:	6-7 (5% aqueous suspension)
Relative Density (H2O=1):	0.2-0.8 as loose fiber
Bulk Density (at 20º C):	25 lbs./cu. ft. as packaged
Solubility in Water:	<2% soluble by weight.
Flammability:	Combustible product
Auto-ignition Temp:	400-500 F

10 Stability and Reactivity

Stability:	Stable
Hazardous Decomposition Products:	Thermal decomposition products of wood may include carbon monoxide, resin acids, terpenes, and polycyclic aromatic hydrocarbons.
Hazardous Polymerization:	Will not occur.
Conditions to Avoid:	Avoid strong acid and bases, and open flame.
Incompatible Materials:	Oxidizing agents.

11 Toxicological Information

Carcinogenicity:

- Sodium Montmorillonite Clay is not listed by ACGIH, IARC, NTP, or OSHA.
- IARC, 1997, concludes that there is sufficient evidence in humans for the carcinogenicity of inhaled crystalline silica from occupational sources (IARC Class 1), that carcinogenicity was not detected in all industrial circumstances studied and that carcinogenicity may depend on characteristics of the crystalline silica or on external factors affecting its biological activity. NTP classifies respirable crystalline silica as "known to be a human carcinogen" (NTP 9th Report on Carcinogens - 2000). ACGIH classifies crystalline silica quartz as a suspected human carcinogen (A2).

12 Ecological Information

No information available.

13 Disposal Considerations

Bury in licensed landfill according to local, state, and federal regulations.

14 Transportation Information

US DOT: Non-regulated

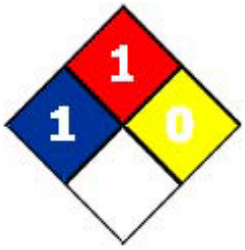
15 Regulatory Information

None of the components in this product are known to be regulated by national or international regulatory bodies.

16 Other Information

SDS Status: Revised from MSDS format in 2015 to comply with GHS requirements.

NFPA and HMIS Ratings:
NFPA: Health: 1, Flammability: 1, Reactivity: 0
HMIS: Health: 1, Flammability: 1, Physical Hazard: 0



All information presented herein is believed to be accurate; however, it is the user's responsibility to determine in advance of need that the information is current and suitable for their circumstances.
No warranty or guarantee, expressed or implied, is made by LSC Environmental Products, LLC as to this information or as to the safety, toxicity, or effect of the use of this product.

ENVIRONMENTAL PRODUCTS, LLC ™

ASTM D4982 Flammability Potential Screening Analysis of Waste

Test Specimen	VERDac Landfill Cover Baled
Requirement	If the sample ignites, it is deemed to have a positive flammability potential. If the sample decomposes, boils (if a liquid), or otherwise fails to ignite after at least 15s of continuous sample heating by the burner flame, the flammability potential is reported as negative
Summary	Each replicate tested had negative flammability potential
Test Performed By	LSC Environmental Products, LLC
Test Date	February 1, 2024

Test Methods

Flammability Method

All tests in this procedure were performed and concluded by LSC Environmental Products, LLC.

A small amount of sample was placed into a metal bowl. A butane torch was lit and adjusted to a blue flame. The flame was held immediately above and perpendicular to the test sample for 2 to 3 seconds without touching the visible flame to the sample. If ignition (a flash or burning) was observed before or after the source of ignition (the flame of the burner) was removed, the sample is said to have a positive flammability potential. If there was no ignition, the flame was then applied to the sample for at least 10 seconds, in an attempt to ignite the sample. If the sample ignited, the sample was said to have a positive flammability potential. If the sample decomposed, boiled (if a liquid), or otherwise failed to ignite after at least 15 seconds of continuous sample heating by the burner flame, the flammability potential is reported as negative.

Results

Each replicate tested had negative flammability potential. The flammability results table is shown below.

VERDac Baled	Replicate 1	Replicate 2	Replicate 3
Perpendicular Flame (2-3 sec.)	Negative	Negative	Negative
Direct Flame (10 sec.)	Negative	Negative	Negative
Direct Flame (15 sec.)	Negative	Negative	Negative

2183 Pennsylvania Avenue, Apalachin, NY 13732

607-625-3050 | 800-800-7671 | 607-625-2689 | www.LSCenv.com

GHS Safety Data Sheet SDS

LSC Environmental Products, LLC
Issue Date: July 10, 2020

1 Identification

Supplier LSC Environmental Products, LLC
2183 Pennsylvania Ave
Apalachin, NY 13732
Telephone: 607-625-3050
Fax: 607-625-2688
Web: www.lscenv.com

Product Name **VERDac Landfill Cover Pellets**
Description: Green Dyed Cellulose Fiber from Shredded Wastepaper and Corn Fiber and Sodium Montmorillonite Clay with Additives
CAS Number: N/A
Recommended Use: Alternative Daily Cover and Hydroseeding.

2 Hazards Identification

Route of Entry: Eye Contact, Skin Contact, Inhalation
Hazards:
- Eye: May cause mechanical irritation.
- Skin: May cause mild skin irritation.
- Ingestion: No known health effects.
- Inhalation: Acute: Short term exposure may cause mechanical irritation resulting in dry cough. May aggravate existing respiratory illness.
  Chronic: Repeated inhalation of respirable* crystalline silica above exposure limits can cause lung disease, including silicosis and lung cancer.

3 Composition / Information on Ingredients

Components in order of Volume:
Cellulose Fiber, Corn Fiber, Sodium Montmorillonite Clay* (Cas # 1318-93-0), Proprietary ingredients and biodegradable green coloring.

*Typical western SMC contains 1-6% crystalline silica as quartz CAS# 14808-60-7.

4 First-Aid Measures

Eye: Flush eyes and under eye lids with plenty of water until irritation ceases. Contact physician if irritation persists.
Skin: Wash with soap and water until clean. Contact physician if irritation develops.

Ingestion: None known.
Inhalation: Move to area free from dust. If symptoms of irritation persist, contact physician.

Inhalation may aggravate existing respiratory illness.

5 Fire Fighting Measures

Flammability:	Combustible product
Auto-ignition Temp:	400-500 F
Fire Extinguishing Media:	Water, Carbon Dioxide, Sand.

6 Accidental Release Measures

Personal Precaution:	Avoid breathing dust; wear respirator approved for silica bearing dust.
Cleanup:	Vacuum to avoid generating airborne dust. Avoid using water. Material becomes slippery when wet.

7 Handling and Storage

Handling:	Use NIOSH/MSHA respirators approved for silica bearing dust when airborne SMC dust levels exceed PEL/TLVs. Clean up spills promptly to avoid making dust. Storage area floors may become slippery if wetted.
Storage:	Store in a dry place. Keep away from ignition sources.

8 Exposure Controls / Personal Protection

Exposure Guidelines (Inhalation):

Component	OSHA PEL (8 hr TWA)	ACGIH TVL
Crystalline Silica as Quartz	0.1 mg/m^3	0.1 mg/m^3
Wood Dust	1 mg/m^3	1 mg/m^3
Particles Not Otherwise Regulated		
Total Dust	15 mg/m^3	N/A
Respirable Dust	5 mg/m^3	N/A

Engineering Controls:	None required for outdoor mixing and application. Use local ventilation to maintain PELs/TLVs if handling indoors.
Personal Protective Equipment:	
Eye and Face Protection:	Wear safety glasses or goggles during loading and application to protect from dust, splashing, and spray mist.
Skin Protection:	Wear gloves and overalls to protect skin and clothing from contact with product. Personal hygiene measures, such as washing hands and face after working with materials, are recommended.

Respiratory Protection: When handling generates dust levels above exposure limits, use respirators approved by NIOSH/MSHA for silica bearing dust.

9 Physical and Chemical Properties

Appearance:	Green Pellets
Odor:	N/A
Physical State:	Granular Mixture of Cellulose Fiber, Corn Fiber, Sodium Montmorillonite Clay, Proprietary Ingredients, Dye
pH:	5.5-7.0
Specific Density:	20-35#'s/ft^3 (approximate)
Specific Gravity:	N/A
Solubility in Water:	<2%
Vapor Pressure (mm Hg):	N/A

10 Stability and Reactivity

Stability:	Stable
Conditions to Avoid:	Avoid open flame. Store in dry areas.
Materials to Avoid:	N/A
Hazardous Polymerization:	No.

11 Toxicological Information

Carcinogenicity:

- Sodium Montmorillonite Clay is not listed by ACGIH, IARC, NTP, or OSHA.
- IARC, 1997, concludes that there is sufficient evidence in humans for the carcinogenicity of inhaled crystalline silica from occupational sources (IARC Class 1), that carcinogenicity was not detected in all industrial circumstances studied and that carcinogenicity may depend on characteristics of the crystalline silica or on external factors affecting its biological activity. NTP classifies respirable crystalline silica as "known to be a human carcinogen" (NTP 9th Report on Carcinogens - 2000). ACGIH classifies crystalline silica quartz as a suspected human carcinogen (A2).

12 Ecological Information

No information available.

13 Disposal Considerations

Bury in licensed landfill according to local, state, and federal regulations.

14 Transportation Information

US DOT: Non-regulated

15 Regulatory Information

None of the components in this product are known to be regulated by national or international regulatory bodies.

16 Other Information

SDS Status: Revised from MSDS format in 2015 to comply with GHS requirements.

All information presented herein is believed to be accurate; however, it is the user's responsibility to determine in advance of need that the information is current and suitable for their circumstances.
No warranty or guarantee, expressed or implied, is made by LSC Environmental Products, LLC as to this information or as to the safety, toxicity, or effect of the use of this product.

APPENDIX B

UNMARKED COMPLETE REPLACEMENT PAGES

CITY OF GRAND PRAIRIE LANDFILL
DALLAS COUNTY, TEXAS
TCEQ PERMIT NO. MSW-996C

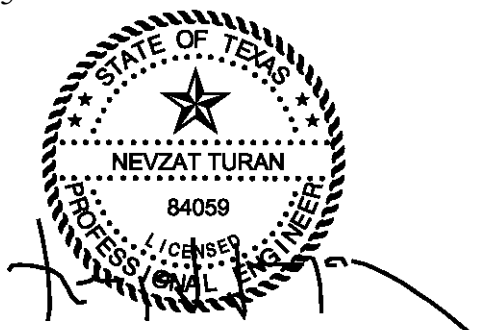
PART IV – SITE OPERATING PLAN

Prepared for

City of Grand Prairie

Approved October 31, 2006
Revised March 2010
Revised November 2015
Revised February 2018
Revised June 2019

Revised May 2025



05/02/2025

Prepared by

Weaver Consultants Group, LLC
TBPE Registration No. F-3727
6420 Southwest Blvd., Suite 206
Fort Worth, Texas 76109
817-735-9770

WCG Project No. 0628-001-11-78

CITY OF GRAND PRAIRIE LANDFILL
DALLAS COUNTY, TEXAS
TCEQ PERMIT NO. MSW-996C

PART IV – SITE OPERATING PLAN

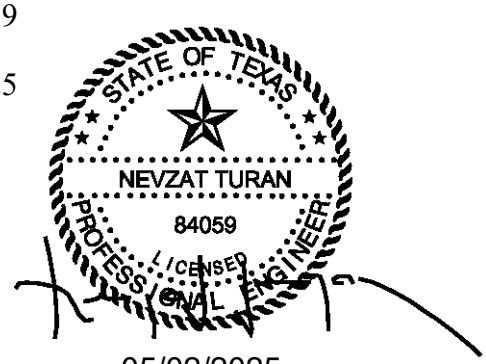
APPENDIX IVB
ALTERNATIVE DAILY COVER OPERATING PLAN INFORMATION

Prepared for

City of Grand Prairie

Approved October 31, 2006
Revised February 2018
Revised June 2019

Revised May 2025



05/02/2025

Prepared by

Weaver Consultants Group, LLC
TBPE Registration No. F-3727
6420 Southwest Blvd., Suite 206
Fort Worth, Texas 76109
817-735-9770

WCG Project No. 0628-001-11-78

ADC SUMMARY

The site is currently approved to use the following types of ADC.

- Durashield 12000
- BioCover
- Quick Cover/Quick Cover LT
- VERDac Bale / VERDac Pellets
- Refiber
- Waste Cover
- Proguard SB
- Wood chips/soil

Consistent with §330.165(d), a temporary authorization will be submitted for any additional future ADC materials. Consistent with 30 TAC 330.165(d)(2), after a Temporary Authorization to use a new ADC material is approved, a status report for the new ADC materials will be submitted on a two-month basis to the TCEQ describing the effectiveness of the alternative materials, any problems that may have occurred, and corrective actions required as a result of such problems. The trial period will be for two 180-day periods with an extension request to be submitted near the end of the first 180-day period. If no unresolved problems occur within the trial period, a permit modification consistent with §305.70(k)(1) will be submitted to the TCEQ to obtain permanent approval of the ADC material.

The procedure listed above replaces the text in the currently approved ADCOP which discussed status reports (i.e., Section 5).

CITY OF GRAND PRAIRIE LANDFILL
DALLAS COUNTY, TEXAS
TCEQ PERMIT NO. MSW-996C

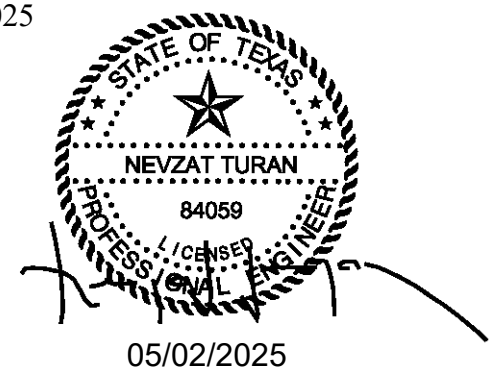
ALTERNATIVE DAILY COVER OPERATING PLAN

Prepared for

City of Grand Prairie

October 2002
Revised February 2003
Revised February 2018
Revised June 2019

Revised May 2025



05/02/2025

Prepared by

Weaver Consultants Group, LLC
TBPE Registration No. F-3727
6420 Southwest Blvd., Suite 206
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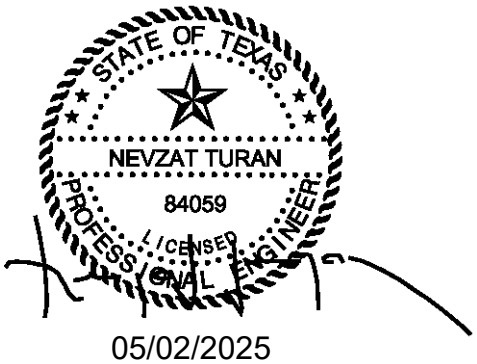
817-735-9770

WCG Project No. 0628-001-11-78

CONTENTS



05/02/2025

1 INTRODUCTION

This Alternate Daily Cover Operating Plan (ADCOP) has been prepared for the City of Grand Prairie Landfill consistent with §330.165(d)(1). The purpose of this ADCOP is to address the following issues:

- Description and thickness of each ADC material
- Chemical composition of the material and the SDS(s) for the ADC (if applicable)
- Operation methods to be utilized at the site when using the ADC
- Effect of the ADC on vectors, fires, odors, and windblown litter

As specified in the Site Operating Plan (SOP) – Daily Cover, ADC may be used to cover exposed waste except when the landfill is to be closed for a period of greater than 24 hours (unless otherwise approved by the TCEQ).

from 0 to 50 percent. The wood chips are produced at the facility and have a nominal size of 2 inches and a maximum size of 6 inches. The remaining portion of the mixture would consist of clean soil.

- Quick Cover / Quick Cover LT. Quick Cover, produced by Tascon, Inc., and Quick Cover LT, produced by Applegate Colorado, LLC, spray-type alternative daily cover (ADC) materials share the same chemical and physical characteristics (i.e., same SDS). The only difference between these two products is that Quick Cover contains added moisture and dye prior to shipment and Quick Cover LT is shipped without adding moisture (i.e., a dry version of the product) and dye (a small packet of dye is shipped with each bag). Once either of the products is mixed with water (e.g., hydromulch machine ADC preparation tank) the resulting product that is applied as ADC is the same. Quick Cover/Quick Cover LT is a blend of cellulose fiber mulch and a binding agent that forms a slurry when mixed with water. The mulch is manufactured from recycled fiber stock (mixed papers) and the binding agent is composed of guar gum powder and applied with a hydromulch machine. This ADC spray material will form a crust-like barrier after application. Additional information is included in Appendix F.
- VERDac Landfill Cover Bale (VERDac Bale) spray-on ADC, produced by LSC Environmental Products, LLC., is a blend of wood fiber and paper fiber, sodium montmorillonite clay, proprietary ingredients (Posi-Shell® mineral binders), and biodegradable blue/green dye that forms a slurry when mixed with water. The bales are manufactured from thermally refined and debarked wood fiber and clean recycled paper. The slurry made using VERDac Bale is applied with a hydromulch machine. VERDac Bale slurry will form a crust-like barrier on the surface of the waste after application. The SDS for VERDac Bale (prior to mixing with water) is provided in Appendix G.
- VERDac Landfill Cover Pellets (VERDac Pellets) spray-on ADC, produced by LSC Environmental Products, LLC. is a blend of cellulose and corn fiber, sodium montmorillonite clay, proprietary ingredients, and biodegradable green coloring that forms a slurry when mixed with water. The mulch is manufactured from recycled fiber stock (mixed papers). The slurry made using VERDac Pellets is applied with a hydromulch machine. VERDac Pellets slurry will form a crust-like barrier on the surface of the waste after application. The SDS for VERDac Pellets (prior to mixing with water) is provided in Appendix G.

2.2 Chemical Characteristics of Synthetic ADC Materials

Chemical characteristics of synthetic ADC materials (e.g., DuraShield 12000, BioCover, Quick Cover/Quick Cover LT, VERDac Bale/VERDac Pellets, Refiber, Waste-Cover, and ProGuard SB) are included in Appendix A through Appendix G. Each of the synthetic ADC materials are not reactive, ignitable, or corrosive under the expected conditions (e.g., high temperature seasons, intense sunlight).

3 OPERATIONAL METHODS

3.1 Introduction

The following subsections discuss the operational procedures that will be used to employ the approved ADC materials. In general, for each type of ADC, site personnel will verify that the waste fill area has been covered with the minimum required thickness at the completion of each working day. The type of ADC (tarp or spray) will be determined by the landfill general manager. The decision will generally be based on the availability of materials and weather conditions. However, the conditions of the equipment and the personnel needs on any given workday may also determine the type of ADC used.

3.2 Tarp ADC Materials

The DURASHIELD material will be deployed as follows:

- Panels of ADC material will be pulled over the working face.
- The perimeter of the tarps will be anchored approximately every 20 feet with tires, dirt, sandbags, or similar material to keep the tarp in-place and prevent vector intrusion.
- The tarps will be removed the following morning by pulling the tarps across themselves to reduce drag. The tarps will be stored in an inactive area.
- Site personnel will utilize appropriate protective gear, including gloves, boots, and masks, as necessary when handling the tarp ADC.

3.3 Spray-Type ADCs

The spray-type ADCs included in this plan are BioCover, Quick Cover/Quick Cover LT, VERDac Bale / VERDac Pellets, Refiber, Waste-Cover, and ProGuard SB. Each material will be handled similarly. The material will be applied to the working face using a FINN T90 (900-gallon capacity) or similar equipment following the procedure listed below.

1. The operator will become familiar with this ADCOP and the SDS for the ADC product to be used before operating the hydroseed machine for ADC, specifically the mixing ratio and application rate. The manufacturer's instructions included with the ADC material should also be followed.

2. The operator will not operate the hydroseed machine until he has been trained by qualified personnel in the operation of the equipment, mixing procedures, and application methods.

3. The operator will mix the spray ADC according to the manufacturer's recommendation; therefore, the documentation from the manufacturer regarding product handling and mixing ratios will be kept in the site operating record. Then, using the hydroseed machine, the operator will apply the ADC from at least two different directions to achieve an overall thickness of approximately 0.25 inches over the exposed waste at the working face. The operator will visually inspect the ADC to ensure the minimum thickness is achieved and no waste is left exposed.

4. The operator will not prepare ADC slurry around or near ignition sources. Mixing of ADC material with water will be performed either in an open area or a well-ventilated enclosed structure. The operator will observe dust during mixing and take necessary precautions (e.g., pouring bags onto mixing water from a close distance) to minimize dust generation.

5. The operator will store ADC material in a dry location that is not susceptible to water ponding. The ADC material will be tarp covered if stored outside to prevent pre-hydration that may cause damage to the bags. If the ADC material is stored in an enclosed structure, the operator will ensure the structure is well-ventilated and any damaged bags removed.

6. Prior to the application of ADC material, the operator will ensure that containment berms around the ADC application area are installed in accordance with Attachment 15 (Appendix 15C and Attachment 15, Section 4.2) and stormwater is managed per Attachment 15 and Sections 4.19 and 4.21 of the SOP.

3.4 Soil-Like ADC Materials

The wood chips/soil mixture will behave similar to a soil-only daily cover. The material will be stockpiled near the working face and spread over the working face with a dozer or similar equipment to a minimum 6-inch thickness. Additionally, clean soil will be added as necessary to ensure appropriate thickness is applied. This wood chip/soil mixture could be used as daily cover for up to 180 days, similar to the requirements for soil daily cover.

Given that the wood chips will be mixed with soil, with a average natural moisture content, it is expected that the wood chip/soil mixture will also be resistant to potential fires. Additionally, the existence of fibrous chips in this mixture increases the shear strength of the cover material so that in turn minimizes water erosion.

5 STATUS REPORTS

Consistent with 30 TAC §330.165(d)(2), a status report on the new ADC materials will be submitted on a bimonthly basis to the TCEQ describing the effectiveness of the alternative materials, any problems that may have occurred, and corrective actions required as a result of such problems (see table below). The status report will also include an assessment of how the Soil-like ADC material is functioning in those areas where it is left exposed for periods more than 24 hours. The trial period will be for two-180-day periods with an extension request to be submitted near the end of the first 180-day period. If no unresolved problems occur within the trial period, a permit modification under 30 TAC §305.70(k)(1) will be submitted to TCEQ to use the ADC materials on a permanent basis.

ADC Material	Type	Status Report Required
Durashield 12000	Tarp	Yes
BioCover	Spray-On	No[1]
Quick Cover / Quick Cover LT	Spray-On	No[1]
VERDac Bale / VERDac Pellets	Spray-On	No[1]
Refiber	Spray-On	No[1]
Waste-Cover	Spray-On	Yes
ProGuard SB	Spray-On	Yes
Wood Chips / Soil	Soil-Like	Yes

[1]ADC Material is currently permitted and approved for use: Bimonthly status reports have previously been submitted; therefore, no bimonthly status reports will be required for this ADC Material. Quick Cover/Quick Cover LT has gone through a demonstration period between June 2018 and May 2019. VERDac Pellets went through a demonstration period between August 2023 and July 2024. VERDac Bale went through a demonstration period between April 2024 and March 2025.

APPENDIX G

VERDAC BALE / VERDAC PELLETS

GHS Safety Data Sheet SDS

LSC Environmental Products, LLC
Issue Date: January 31, 2024

1 Identification

Supplier LSC Environmental Products, LLC
2183 Pennsylvania Ave
Apalachin, NY 13732
Telephone: 607-625-3050
Fax: 607-625-2688
Web: www.lscenv.com

Product Name **VERDac Landfill Cover Bale**
Description: Blue/Green dyed Wood Fiber and Paper Fiber, and Sodium Montmorillonite Clay with Additives
CAS Number: N/A
Recommended Use: Landfill Alternative Daily Cover and Hydroseeding.

2 Hazards Identification

Route of Entry: Eye Contact, Skin Contact, Inhalation

Hazards:
- Eye: May cause mechanical irritation. Wood dust can irritate the eyes.
- Skin: May cause drying resulting in dermatitis. Wood dust can cause irritation.
- Ingestion: No reports of human ingestion.
- Inhalation: Acute: Short term exposure may cause mechanical irritation resulting in dry cough. May aggravate existing respiratory illness. Chronic:Repeated inhalation of respirable* crystalline silica above exposure limits can cause lung disease, including silicosis and lung cancer.

OSHA Classification: Wood dust is a hazardous substance as defined by the Hazardous Communication Standard 29CFR 1910.1200

3 Composition / Information on Ingredients

Component	CAS#	Amount
Wood-Debarked whole	N/A	70%
Clean Recycled Paper	N/A	25%
Sodium Montmorillonite Clay (SMC)*	1318-93-0	5%

*Typical western SMC contains 1-6% crystalline silica as quartz CAS# 14808-60-7.

4 First-Aid Measures

Eye: Flush eyes and under eye lids with plenty of water until irritation ceases. Contact physician if irritation persists.

Skin: Wash with soap and water until clean. Contact physician if irritation develops.

Ingestion: None known.
Inhalation: Move to area free from dust. If symptoms of irritation persist, contact physician. Inhalation may aggravate existing respiratory illness.

5 Fire Fighting Measures

Flammability: Combustible product
Auto-ignition Temp: 400-500 F
Fire Extinguishing Media: Water, Carbon Dioxide, Sand.

6 Accidental Release Measures

Personal Precaution: Avoid breathing dust; wear respirator approved for silica bearing dust.
Cleanup: Vacuum to avoid generating airborne dust. Avoid using water. Material becomes slippery when wet.

7 Handling and Storage

Handling: Use NIOSH/MSHA respirators approved for silica bearing dust when airborne SMC dust levels exceed PEL/TLVs. Clean up spills promptly to avoid making dust. Storage area floors may become slippery if wetted.
Storage: Store in a dry place. Keep away from ignition sources.

8 Exposure Controls / Personal Protection

Exposure Guidelines (Inhalation):

Component	OSHA PEL (8 hr TWA)	ACGIH TVL
Crystalline Silica as Quartz	0.1 mg/m^3	0.1 mg/m^3
Wood Dust	1 mg/m^3	1 mg/m^3
Particles Not Otherwise Regulated		
Total Dust	15 mg/m^3	N/A
Respirable Dust	5 mg/m^3	N/A

Engineering Controls: None required for outdoor mixing and application. Use local ventilation to maintain PELs/TLVs if handling indoors.

Personal Protective Equipment:

Eye and Face Protection: Wear safety glasses or goggles during loading and application to protect from dust, splashing, and spray mist.

Skin Protection: Wear gloves and overalls to protect skin and clothing from contact with product. Personal hygiene measures,

such as washing hands and face after working with materials, are recommended.

Respiratory Protection: When handling generates dust levels above exposure limits, use respirators approved by NIOSH/MSHA for silica bearing dust.

9 Physical and Chemical Properties

Appearance:	Dyed green/blue wood fibers.
Odor:	Slightly woody
pH:	6-7 (5% aqueous suspension)
Relative Density (H2O=1):	0.2-0.8 as loose fiber
Bulk Density (at 20º C):	25 lbs./cu. ft. as packaged
Solubility in Water:	<2% soluble by weight.
Flammability:	Combustible product
Auto-ignition Temp:	400-500 F

10 Stability and Reactivity

Stability:	Stable
Hazardous Decomposition Products:	Thermal decomposition products of wood may include carbon monoxide, resin acids, terpenes, and polycyclic aromatic hydrocarbons.
Hazardous Polymerization:	Will not occur.
Conditions to Avoid:	Avoid strong acid and bases, and open flame.
Incompatible Materials:	Oxidizing agents.

11 Toxicological Information

Carcinogenicity:

- Sodium Montmorillonite Clay is not listed by ACGIH, IARC, NTP, or OSHA.
- IARC, 1997, concludes that there is sufficient evidence in humans for the carcinogenicity of inhaled crystalline silica from occupational sources (IARC Class 1), that carcinogenicity was not detected in all industrial circumstances studied and that carcinogenicity may depend on characteristics of the crystalline silica or on external factors affecting its biological activity. NTP classifies respirable crystalline silica as "known to be a human carcinogen" (NTP 9th Report on Carcinogens - 2000). ACGIH classifies crystalline silica quartz as a suspected human carcinogen (A2).

12 Ecological Information

No information available.

13 Disposal Considerations

Bury in licensed landfill according to local, state, and federal regulations.

14 Transportation Information

US DOT: Non-regulated

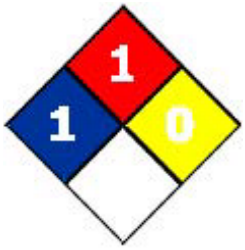
15 Regulatory Information

None of the components in this product are known to be regulated by national or international regulatory bodies.

16 Other Information

SDS Status: Revised from MSDS format in 2015 to comply with GHS requirements.

NFPA and HMIS Ratings:
NFPA: Health: 1, Flammability: 1, Reactivity: 0
HMIS: Health: 1, Flammability: 1, Physical Hazard: 0



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No warranty or guarantee, expressed or implied, is made by LSC Environmental Products, LLC as to this information or as to the safety, toxicity, or effect of the use of this product.

ENVIRONMENTAL PRODUCTS, LLC ™

ASTM D4982 Flammability Potential Screening Analysis of Waste

Test Specimen	VERDac Landfill Cover Baled
Requirement	If the sample ignites, it is deemed to have a positive flammability potential. If the sample decomposes, boils (if a liquid), or otherwise fails to ignite after at least 15s of continuous sample heating by the burner flame, the flammability potential is reported as negative
Summary	Each replicate tested had negative flammability potential
Test Performed By	LSC Environmental Products, LLC
Test Date	February 1, 2024

Test Methods

Flammability Method

All tests in this procedure were performed and concluded by LSC Environmental Products, LLC.

A small amount of sample was placed into a metal bowl. A butane torch was lit and adjusted to a blue flame. The flame was held immediately above and perpendicular to the test sample for 2 to 3 seconds without touching the visible flame to the sample. If ignition (a flash or burning) was observed before or after the source of ignition (the flame of the burner) was removed, the sample is said to have a positive flammability potential. If there was no ignition, the flame was then applied to the sample for at least 10 seconds, in an attempt to ignite the sample. If the sample ignited, the sample was said to have a positive flammability potential. If the sample decomposed, boiled (if a liquid), or otherwise failed to ignite after at least 15 seconds of continuous sample heating by the burner flame, the flammability potential is reported as negative.

Results

Each replicate tested had negative flammability potential. The flammability results table is shown below.

VERDac Baled	Replicate 1	Replicate 2	Replicate 3
Perpendicular Flame (2-3 sec.)	Negative	Negative	Negative
Direct Flame (10 sec.)	Negative	Negative	Negative
Direct Flame (15 sec.)	Negative	Negative	Negative

2183 Pennsylvania Avenue, Apalachin, NY 13732

607-625-3050 | 800-800-7671 | 607-625-2689 | www.LSCenv.com

GHS Safety Data Sheet SDS

LSC Environmental Products, LLC
Issue Date: July 10, 2020

1 Identification

Supplier LSC Environmental Products, LLC
2183 Pennsylvania Ave
Apalachin, NY 13732
Telephone: 607-625-3050
Fax: 607-625-2688
Web: www.lscenv.com

Product Name **VERDac Landfill Cover Pellets**
Description: Green Dyed Cellulose Fiber from Shredded Wastepaper and Corn Fiber and Sodium Montmorillonite Clay with Additives
CAS Number: N/A
Recommended Use: Alternative Daily Cover and Hydroseeding.

2 Hazards Identification

Route of Entry: Eye Contact, Skin Contact, Inhalation
Hazards:
- Eye: May cause mechanical irritation.
- Skin: May cause mild skin irritation.
- Ingestion: No known health effects.
- Inhalation: Acute: Short term exposure may cause mechanical irritation resulting in dry cough. May aggravate existing respiratory illness.
  Chronic: Repeated inhalation of respirable* crystalline silica above exposure limits can cause lung disease, including silicosis and lung cancer.

3 Composition / Information on Ingredients

Components in order of Volume:
Cellulose Fiber, Corn Fiber, Sodium Montmorillonite Clay* (Cas # 1318-93-0), Proprietary ingredients and biodegradable green coloring.

*Typical western SMC contains 1-6% crystalline silica as quartz CAS# 14808-60-7.

4 First-Aid Measures

Eye: Flush eyes and under eye lids with plenty of water until irritation ceases. Contact physician if irritation persists.
Skin: Wash with soap and water until clean. Contact physician if irritation develops.

Ingestion: None known.
Inhalation: Move to area free from dust. If symptoms of irritation persist, contact physician.

Inhalation may aggravate existing respiratory illness.

5 Fire Fighting Measures

Flammability:	Combustible product
Auto-ignition Temp:	400-500 F
Fire Extinguishing Media:	Water, Carbon Dioxide, Sand.

6 Accidental Release Measures

Personal Precaution:	Avoid breathing dust; wear respirator approved for silica bearing dust.
Cleanup:	Vacuum to avoid generating airborne dust. Avoid using water. Material becomes slippery when wet.

7 Handling and Storage

Handling:	Use NIOSH/MSHA respirators approved for silica bearing dust when airborne SMC dust levels exceed PEL/TLVs. Clean up spills promptly to avoid making dust. Storage area floors may become slippery if wetted.
Storage:	Store in a dry place. Keep away from ignition sources.

8 Exposure Controls / Personal Protection

Exposure Guidelines (Inhalation):

Component	OSHA PEL (8 hr TWA)	ACGIH TVL
Crystalline Silica as Quartz	0.1 mg/m^3	0.1 mg/m^3
Wood Dust	1 mg/m^3	1 mg/m^3
Particles Not Otherwise Regulated		
Total Dust	15 mg/m^3	N/A
Respirable Dust	5 mg/m^3	N/A

Engineering Controls:	None required for outdoor mixing and application. Use local ventilation to maintain PELs/TLVs if handling indoors.
Personal Protective Equipment:	
Eye and Face Protection:	Wear safety glasses or goggles during loading and application to protect from dust, splashing, and spray mist.
Skin Protection:	Wear gloves and overalls to protect skin and clothing from contact with product. Personal hygiene measures, such as washing hands and face after working with materials, are recommended.

Respiratory Protection: When handling generates dust levels above exposure limits, use respirators approved by NIOSH/MSHA for silica bearing dust.

9 Physical and Chemical Properties

Appearance:	Green Pellets
Odor:	N/A
Physical State:	Granular Mixture of Cellulose Fiber, Corn Fiber, Sodium Montmorillonite Clay, Proprietary Ingredients, Dye
pH:	5.5-7.0
Specific Density:	20-35#'s/ft^3 (approximate)
Specific Gravity:	N/A
Solubility in Water:	<2%
Vapor Pressure (mm Hg):	N/A

10 Stability and Reactivity

Stability:	Stable
Conditions to Avoid:	Avoid open flame. Store in dry areas.
Materials to Avoid:	N/A
Hazardous Polymerization:	No.

11 Toxicological Information

Carcinogenicity:

- Sodium Montmorillonite Clay is not listed by ACGIH, IARC, NTP, or OSHA.
- IARC, 1997, concludes that there is sufficient evidence in humans for the carcinogenicity of inhaled crystalline silica from occupational sources (IARC Class 1), that carcinogenicity was not detected in all industrial circumstances studied and that carcinogenicity may depend on characteristics of the crystalline silica or on external factors affecting its biological activity. NTP classifies respirable crystalline silica as "known to be a human carcinogen" (NTP 9th Report on Carcinogens - 2000). ACGIH classifies crystalline silica quartz as a suspected human carcinogen (A2).

12 Ecological Information

No information available.

13 Disposal Considerations

Bury in licensed landfill according to local, state, and federal regulations.

14 Transportation Information

US DOT: Non-regulated

15 Regulatory Information

None of the components in this product are known to be regulated by national or international regulatory bodies.

16 Other Information

SDS Status: Revised from MSDS format in 2015 to comply with GHS requirements.

All information presented herein is believed to be accurate; however, it is the user's responsibility to determine in advance of need that the information is current and suitable for their circumstances.
No warranty or guarantee, expressed or implied, is made by LSC Environmental Products, LLC as to this information or as to the safety, toxicity, or effect of the use of this product.

APPENDIX C

VERDAC BALE / VERDAC PELLETS
TEMPORARY AUTHORIZATION APPROVAL LETTERS

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 25, 2024

Patricia D. B. Redfearn, Ph.D.
Solid Waste Manager
City of Grand Prairie
P.O. Box 534045
Grand Prairie, Texas 75053

Via email

Subject: City of Grand Prairie Landfill – Dallas County
Municipal Solid Waste – Permit No. 996C
Temporary Authorization – Approved
Tracking No. 29642592; RN100542216/CN600253967

Dear Dr. Redfearn:

We have reviewed the request dated March 6, 2024, for a temporary authorization for the above-referenced facility to use VERDac Landfill Cover Bale spray-on product on a trial basis to evaluate its effectiveness as an alternate daily cover material. In accordance with Title 30 Texas Administrative Code, §305.62(k), our evaluation indicates that the information presented is sufficient to allow the requested temporary authorization with the conditions established in the enclosed issuance document.

The enclosed copy of the referenced temporary authorization should be maintained in the facility's files. The documentation prepared and submitted to support the temporary authorization request shall be considered as requirements of the permit.

If you have any questions concerning this matter, please contact Mr. Chance Robinson at (512) 239-0565, by email to chance[redacted] or in writing at the address on our letterhead (please include mail code MC 124 on the first line).

This action is taken under authority delegated by the executive director of the Texas Commission on Environmental Quality.

Sincerely,

Megan Henson, Manager
Municipal Solid Waste Permits Section
Waste Permits Division

MH/CJR/gg

cc: Mr. Nevzat Turan, P.E., Weaver Consultants Group, LLC, Fort Worth

Enclosure

Texas Commission on Environmental Quality

Temporary Authorization
Municipal Solid Waste Permit No. 996C
City of Grand Prairie – City of Grand Prairie Landfill

Municipal Solid Waste Permit No. 996C is hereby authorized as follows:

Description of Temporary Authorization:

City of Grand Prairie Landfill, MSW Permit No. 996C is hereby authorized to use the following material(s) on a trial basis to evaluate its effectiveness as an alternative daily cover (ADC), subject to the following conditions.

1. The permittee shall contact the Texas Commission on Environmental Quality Region 4 office at least ten days prior to the use of ADC materials and on a regular basis thereafter, to allow inspection and monitoring of the performance of the ADC material during this trial period.

2. Types of ADC material to be used during this trial period shall be limited to the following:

    - Spray-on – VERDac Landfill Cover Bale by LSC Environmental Products, LLC

3. The ADC material must be prepared as specified by the manufacturer and applied from at least two different directions or as prescribed by the manufacturer, whichever yields better coverage, to achieve an overall thickness of not less than 0.25 inches over the exposed waste.

4. The use of ADC materials is limited to a 24-hour period after which either waste or daily cover as defined in Title 30 Texas Administrative Code (30 TAC), §330.165(a) must be placed.

5. The trial period shall begin 15 days after the date this temporary authorization is issued, unless an alternate start date was requested in writing by the permittee and approved as part of this temporary authorization.

6. The ADC trial period should include all seasons of the year; therefore, as the facility nears the end of the initial trial period, an extension may be requested. Each ADC material listed in this temporary authorization may be used for not more than 180 days following initiation of the trial period, and for an additional trial period not to exceed 180 days upon approval of a one-time extension. This temporary authorization for the first trial period will expire 180 days after the initiation of the trial period.

7. If after a one-year trial period, the ADC material proves to be effective as daily cover in accordance with 30 TAC §330.165(d), the facility may request to incorporate the material as an option in the permit by an amendment in accordance with 30 TAC §305.62, or a modification with notice in accordance with 30 TAC §305.70(k)(1).

8. In accordance with 30 TAC §330.165(d)(2), written status reports for each ADC material shall be submitted on a two-month basis to the executive director during the trial period. The reports shall include usage logs listing the days the ADC was used at the site, and shall contain information describing the effectiveness of the ADC material, any problems that may have occurred, and corrective action required as a result of such problems. If an ADC material is not utilized during each two-month period, the status report should also discuss this fact.

The details of this temporary authorization are contained in the request dated March 6, 2024, and shall be considered as requirements of the permit.

Approved, *Issued* and *Effective* in accordance with 30 TAC §305.62(k), for 180 days.

Issued Date: March 25, 2024

K Keel

For the Commission

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 7, 2024

Dr. Patricia Redfearn
Solid Waste Manager
City of Grand Prairie
P.O. Box 534045
Grand Prairie, Texas 75053

Via email

Subject: City of Grand Prairie Landfill – Dallas County
Municipal Solid Waste (MSW) – Permit No. 996C
Alternative Daily Cover Temporary Authorization-Extension – Approved
Tracking No. 30169381; RN100542216/CN600253967

Dear Dr. Redfearn:

We have reviewed the request dated September 30, 2024, for a temporary authorization for the above-referenced facility to use VERDac Bale spray-type alternative daily cover (ADC) on a trial basis, in order to evaluate its effectiveness as an ADC material. This request is an extension of the original request from March 6, 2024. In accordance with Title 30 Texas Administrative Code, §305.62(k), our evaluation indicates that the information presented is sufficient to allow the requested temporary authorization with the conditions established in the enclosed issuance document.

The enclosed copy of the referenced temporary authorization should be maintained in the facility's files. The documentation prepared and submitted to support the temporary authorization request shall be considered as requirements of the permit.

If you have any questions concerning this matter, please contact Mr. Henok Tewelde at (512) 239-0554, by email to henok.[redacted] or in writing at the address on our letterhead (please include mail code MC 124 on the first line).

This action is taken under authority delegated by the executive director of the Texas Commission on Environmental Quality.

Sincerely,

Megan Henson, Manager
Municipal Solid Waste Permits Section
Waste Permits Division

MH/HT/mc

cc: Mr. Nevzat Turan, P.E., Weaver Consultants Group, LLC, Fort Worth

Enclosure

Texas Commission on Environmental Quality

Temporary Authorization-Extension
Municipal Solid Waste Permit No. 996C
City of Grand Prairie – City of Grand Prairie Landfill

Municipal Solid Waste (MSW) Permit No. 996C is hereby authorized as follows:

Description of Temporary Authorization:

City of Grand Prairie, MSW Permit No. 996C is hereby authorized to use the following material on an extended trial basis to evaluate its effectiveness as an alternative daily cover (ADC) as an extension to original request of March 6, 2024, subject to the following conditions.

1. The permittee shall contact the Texas Commission on Environmental Quality Region 4 office at least 10 days prior to the use of ADC material and on a regular basis thereafter, to allow inspection and monitoring of the performance of the ADC material during this trial period.

2. Types of ADC material to be used during this extended trial period shall be limited to the following:

    - VERDac Bale spray-type ADC by LSC Environmental Products, LLC.

3. The ADC material must be prepared as specified by the manufacturer and applied from at least two different directions or as prescribed by the manufacturer, whichever yields better coverage, to achieve an overall thickness of not less than 0.25 inches over the exposed waste.

4. The use of ADC materials is limited to a 24-hour period after which either waste or daily cover as defined in Title 30 Texas Administrative Code (30 TAC), §330.165(a) must be placed.

5. If after this trial period, the ADC material proves to be effective as daily cover in accordance with 30 TAC §330.165(d), the facility may request to incorporate the material as an option in the permit by an amendment in accordance with 30 TAC §305.62, or a modification with notice in accordance with 30 TAC §305.70(k)(1).

6. In accordance with 30 TAC §330.165(d)(2), written status reports for each ADC material shall be submitted on a two-month basis to the executive director during the trial period. The reports shall include usage logs listing the days the ADC was used at the site, and shall contain information describing the effectiveness of the ADC material, any problems that may have occurred, and corrective action required as a result of such

problems. If an ADC material is not utilized during each two-month period, the status report should also discuss this fact.

The details of this temporary authorization are contained in the original request dated March 6, 2024**,** and the extension request dated September 30, 2024, and shall be considered as requirements of the permit.

Approved, *Issued* and *Effective* in accordance with 30 TAC §305.62(k), for 180 days.

Issued Date: October 7, 2024

For the Commission

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 18, 2023

Dr. Patricia Redfearn
Solid Waste Manager
City of Grand Prairie
P.O. Box 534045
Grand Prairie, Texas 75053

Via email

Subject: City of Grand Prairie Landfill – Dallas County
Municipal Solid Waste (MSW) – Permit No. 996C
Temporary Authorization – Approved
Tracking No. 28873398; RN100542216/CN600253967

Dear Dr. Redfearn:

We have reviewed the request dated July 05, 2023, for a temporary authorization for the above-referenced facility to use VERDac spray-type material on a trial basis to evaluate its effectiveness as an alternate daily cover material. In accordance with Title 30 Texas Administrative Code, §305.62(k), our evaluation indicates that the information presented is sufficient to allow the requested temporary authorization with the conditions established in the enclosed issuance document.

The enclosed copy of the referenced temporary authorization should be maintained in the facility's files. The documentation prepared and submitted to support the temporary authorization request shall be considered as requirements of the permit.

If you have any questions concerning this matter, please contact Mr. Henok Tewelde at (512) 239-0554, by email to henok.[redacted] or in writing at the address on our letterhead (please include mail code MC 124 on the first line).

This action is taken under authority delegated by the executive director of the Texas Commission on Environmental Quality.

Sincerely,

Megan Henson, Manager
Municipal Solid Waste Permits Section
Waste Permits Division

MH/HT/ap

cc: Mr. Nevzat Turan, P.E., Weaver Consultants Group, LLC, Fort Worth

Texas Commission on Environmental Quality

Temporary Authorization
Municipal Solid Waste Permit No. 996C
City of Grand Prairie – City of Grand Prairie Landfill

Municipal Solid Waste (MSW) Permit No. 996C is hereby authorized as follows:

Description of Temporary Authorization:

City of Grand Prairie, MSW Permit No. 996C is hereby authorized to use the following material on a trial basis to evaluate its effectiveness as an alternative daily cover (ADC), subject to the following conditions.

1. The permittee shall contact the Texas Commission on Environmental Quality Region 4 office at least ten days prior to the use of ADC materials and on a regular basis thereafter, to allow inspection and monitoring of the performance of the ADC material during this trial period.

2. Types of ADC material to be used during this trial period shall be limited to the following:

    - VERDac spray-type by LSC Environmental Products, LLC.

3. The ADC material must be prepared as specified by the manufacturer and applied from at least two different directions or as prescribed by the manufacturer, whichever yields better coverage, to achieve an overall thickness of not less than 0.25 inches over the exposed waste.

4. Storm water runoff from areas that have been covered with VERDac shall be controlled and managed as contaminated water.

5. The use of ADC material is limited to a 24-hour period after which either waste or daily cover as defined in Title 30 Texas Administrative Code (30 TAC), §330.165(a) must be placed.

6. The trial period shall begin 15 days after the date this temporary authorization is issued, unless an alternate start date was requested in writing by the permittee and approved as part of this temporary authorization.

7. The ADC trial period should include all seasons of the year; therefore, as the facility nears the end of the initial trial period, an extension may be requested. Each ADC material listed in this temporary authorization may be used for not more than 180 days following initiation of the trial period, and for an additional trial period not to exceed 180 days upon approval of a one-time extension. This temporary authorization for the first trial period will expire 180 days after the initiation of the trial period.

8. If after a one year trial period, the ADC material proves to be effective as daily cover in accordance with 30 TAC §330.165(d), the facility may request to incorporate the material as an option in the permit by an amendment in accordance with 30 TAC §305.62, or a modification with notice in accordance with 30 TAC §305.70(k)(1).

9. In accordance with 30 TAC §330.165(d)(2), written status reports for each ADC material shall be submitted on a two-month basis to the executive director during the trial period. The reports shall include usage logs listing the days the ADC was used at the site, and shall contain information describing the effectiveness of the ADC material, any problems that may have occurred, and corrective action required as a result of such problems. If an ADC material is not utilized during each two-month period, the status report should also discuss this fact.

The details of this temporary authorization are contained in the request dated July 05, 2023, and shall be considered as requirements of the permit.

Approved, *Issued* and *Effective* in accordance with 30 TAC §305.62(k), for 180 days.

Issued Date: July 18, 2023

For the Commission

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 2, 2024

Patricia D. B. Redfearn, Ph.D.
Solid Waste Manager
City of Grand Prairie
P.O. Box 534045
Grand Prairie, Texas 75053

Via email

Subject: City of Grand Prairie Landfill – Dallas County
Municipal Solid Waste (MSW) – Permit No. 996C
Temporary Authorization Extension – Approved
Tracking No. 29500995; RN100542216/CN600253967

Dear Dr. Redfearn:

We have reviewed the request dated January 19, 2024 for a one-time extension of the temporary authorization for the above-referenced facility to continue use of the VERDac spray-type product on a trial basis to evaluate its effectiveness as an alternate daily cover (ADC) material. In accordance with Title 30 Texas Administrative Code, §305.62(k), our evaluation indicates that the information presented is sufficient to allow the requested temporary authorization with the conditions established in the enclosed issuance document.

Please ensure that the ADC status reports are submitted for each two-month period of this temporary authorization extension.

The enclosed copy of the referenced temporary authorization extension should be maintained in the facility's files. The documentation prepared and submitted to support the temporary authorization extension request shall be considered as requirements of the permit.

If you have any questions concerning this matter, please contact Mr. Lyndon Poole at (512) 239-0599, by email to [redacted] or in writing at the address on our letterhead (please include mail code MC 124 on the first line).

This action is taken under authority delegated by the executive director of the Texas Commission on Environmental Quality.

Sincerely,

Megan Henson, Manager
Municipal Solid Waste Permits Section
Waste Permits Division

MH/lp/tw

Enclosure
cc: Mr. Nevzat Turan, P.E., Weaver Consultants Group, LLC, Fort Worth

Texas Commission on Environmental Quality

Temporary Authorization
Municipal Solid Waste Permit No. 996C
City of Grand Prairie – City of Grand Prairie Landfill

Municipal Solid Waste (MSW) Permit No. 996C is hereby authorized as follows:

Description of Temporary Authorization:

City of Grand Prairie, MSW Permit No. 996C is hereby authorized to use the following material on an extended trial basis to evaluate its effectiveness as an alternative daily cover (ADC), subject to the following conditions.

1. The permittee shall contact the Texas Commission on Environmental Quality Region 4 office at least ten days prior to the use of ADC material and on a regular basis thereafter, to allow inspection and monitoring of the performance of the ADC material during this trial period.

2. Types of ADC material to be used during this extended trial period shall be limited to the following:

    - VERDac spray-type by LSC Environmental Products, LLC.

3. The ADC material must be prepared as specified by the manufacturer and applied from at least two different directions or as prescribed by the manufacturer, whichever yields better coverage, to achieve an overall thickness of not less than 0.25 inches over the exposed waste.

4. Storm water runoff from areas that have been covered with contaminated soil ADC and from contaminated soil ADC stockpiles shall be controlled and managed as contaminated water.

5. The use of ADC materials is limited to a 24-hour period after which either waste or daily cover as defined in Title 30 Texas Administrative Code (30 TAC), §330.165(a) must be placed.

6. If after this extended trial period the ADC material proves to be effective as daily cover in accordance with 30 TAC §330.165(d), the facility may request to incorporate the material as an option in the permit by an amendment in accordance with 30 TAC §305.62, or a modification with notice in accordance with 30 TAC §305.70(k)(1).

7. In accordance with 30 TAC §330.165(d)(2), written status reports for each ADC material shall be submitted on a two-month basis to the executive director during the trial period. The reports shall include usage logs listing the days the ADC was used at the site and shall contain information describing the effectiveness of the ADC material, any problems that may have occurred, and corrective action required as a result of such problems. If an ADC material is not utilized during each two-month period, the status report should also discuss this fact.

The details of this temporary authorization are contained in the original request dated July 05, 2023, and the extension request dated January 19, 2024, and shall be considered as requirements of the permit.

Approved, *Issued* and *Effective* in accordance with 30 TAC §305.62(k), for 180 days.

Issued Date: February 2, 2024

For the Commission

APPENDIX D

TCEQ FORM 20650

Texas Commission on Environmental Quality

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

Application Tracking Information

Facility Name: City of Grand Prairie Landfill

Permittee or Registrant Name: City of Grand Prairie Landfill

MSW Authorization Number: 996C

Initial Submission Date: 03/2025

Revision Date: 05/2025

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 [redacted] or by phone at 512-239-2335.

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 [redacted]

[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.

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: Nevzat Turan, P.E.

Title: Principal

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: City of Grand Prairie Landfill

Contact Name: Patricia D.B. Redfearn, Ph.D. Title: Director of Solid Waste & Recycling

MSW Authorization Number (if existing): 996C

Regulated Entity Reference Number: **RN** 100542216

Physical or Street Address: 1102 MacArthur Boulevard

City: Grand Prairie County: Dallas State: TX Zip Code: 75050

Phone Number: (972) 237-8147

Latitude (Degrees, Minutes, Seconds): N 32 46' 16.2915"

Longitude (Degrees, Minutes, Seconds): W 96 56' 51.1927"

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:

The purpose of this permit modification is to request the use of VERDac Bale and VERDac Pellets spray-on alternative daily cover (ADC) at the City of Grand Prairie Landfill on a permanent basis.

11. Facility Contact Information

Site Operator (Permittee or Registrant)

Name: City of Grand Prairie

Customer Reference Number: **CN** 600253967

Contact Name: Patricia D.B. Redfearn, Ph.D. Title: Director of Solid Waste & Recycling

Mailing Address: PO Box 534045

City: Grand Prairie County: Dallas State: TX Zip Code: 75053

Phone Number: (972) 237-8147

Email Address [redacted]

Texas Secreta _____

Operator (if different from *Site Operator*)

Name: Same as Operator

Customer Reference Number: **CN** _____

Contact Name: _____ Title: _____

Mailing Address: _____

City: _____ County: _____ State: _____ Zip Code: _____

Phone Number: _____

Email Address: _____

Texas Secretary of State (SOS) Filing Number: _____

Consultant (if applicable)

Firm Name: Weaver Consultants Group, LLC

Consultant Name: Nevzat Turan, P.E.

Texas Board of Professional Engineers Firm Registration Number: F-3727

Contact Name: Nevzat Turan, P.E. Title: Principal

Mailing Address: 6420 Southwest Boulevard, Suite 206

City: Fort Worth County: Tarrant State: TX Zip Code: 76109

Phone Number: 817-735-9770

Email Address [redacted]

Agent in Ser

Name: _____

Mailing Address: _____

City: _____ County: _____ State: TX Zip Code: _____

Phone Number: _____

Email Address: _____

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 this section.

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: _____

Mailing Address: _____

City: _____ County: _____ State: TX Zip Code: _____

Phone Number: _____

Email Address: _____

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: Patricia D.B. Redfearn, Ph.D. Title: Director of Solid Waste & Recycling

Email Address: [redacted]

Signature: Patricia DB Redfearn Date: 5/2/2025

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 Patricia DB Redfearn

On this 2nd day of May, 2025

My commission expires on the 15th day of June, 2026

Wendy A. Giovino

Notary Public in and for

Dallas County, Texas

WENDY A GIOVINO
Notary Public, State of Texas
Comm. Expires 06-15-2026
Notary ID 13381216-9

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	Appendix E
Landowners List	Appendix E
Marked (Redline/Strikeout) Pages	Appendix A
Unmarked Revised Pages	Appendix B

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)	
☐ Signatory Authority Delegation	
☐ Fee Payment Receipt	
☐ Confidential Documents	

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	
Unmarked Revised Pages	

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)	
☐ Signatory Authority Delegation	
☐ Fee Payment Receipt	
☐ Confidential Documents	

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)	
Property Legal Description	
Property Metes and Bounds Description	
Metes and Bounds Drawings	
On-Site Easements Drawing	
Land Ownership Map	
Land Ownership List	
Property Owner Affidavit	
Verification of Legal Status	
Evidence of Competency	

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	
☐ Fee Payment Receipt	
☐ Confidential Documents	
☐ Final Plat Record of Property	
☐ Assumed Name Certificate	

APPENDIX E

ADJACENT LANDOWNERS INFORMATION

LANDOWNER LIST AND MAP

The following landowner list and Figure E-1 provide the names, mailing addresses, and locations of the "Adjacent and Potentially Affected Landowners" around the facility. The list is based on information obtained from the Dallas Central Appraisal District and the City of Grand Prairie Geographic Information Systems (GIS) Department (April 2025) and includes all tracts within ¼ mile of the site. Refer to Figure E-1, Land Ownership Map, for location of the properties. The numbers on the landowner list correspond to the numbers listed on Figure E-1.

LANDOWNER'S LIST

1. CITY OF GRAND PRAIRIE
   300 W MAIN ST
   GRAND PRAIRIE TX 75050-5621

2. TRINITY RIVER AUTHORITY OF TEXAS
   PO BOX 60
   ARLINGTON TX 76004-0060

3. HERMAN H PLATTNER ETAL
   25 HIGHLAND PARK VILLAGE
   SUITE 100-711
   DALLAS TX 75205-2789

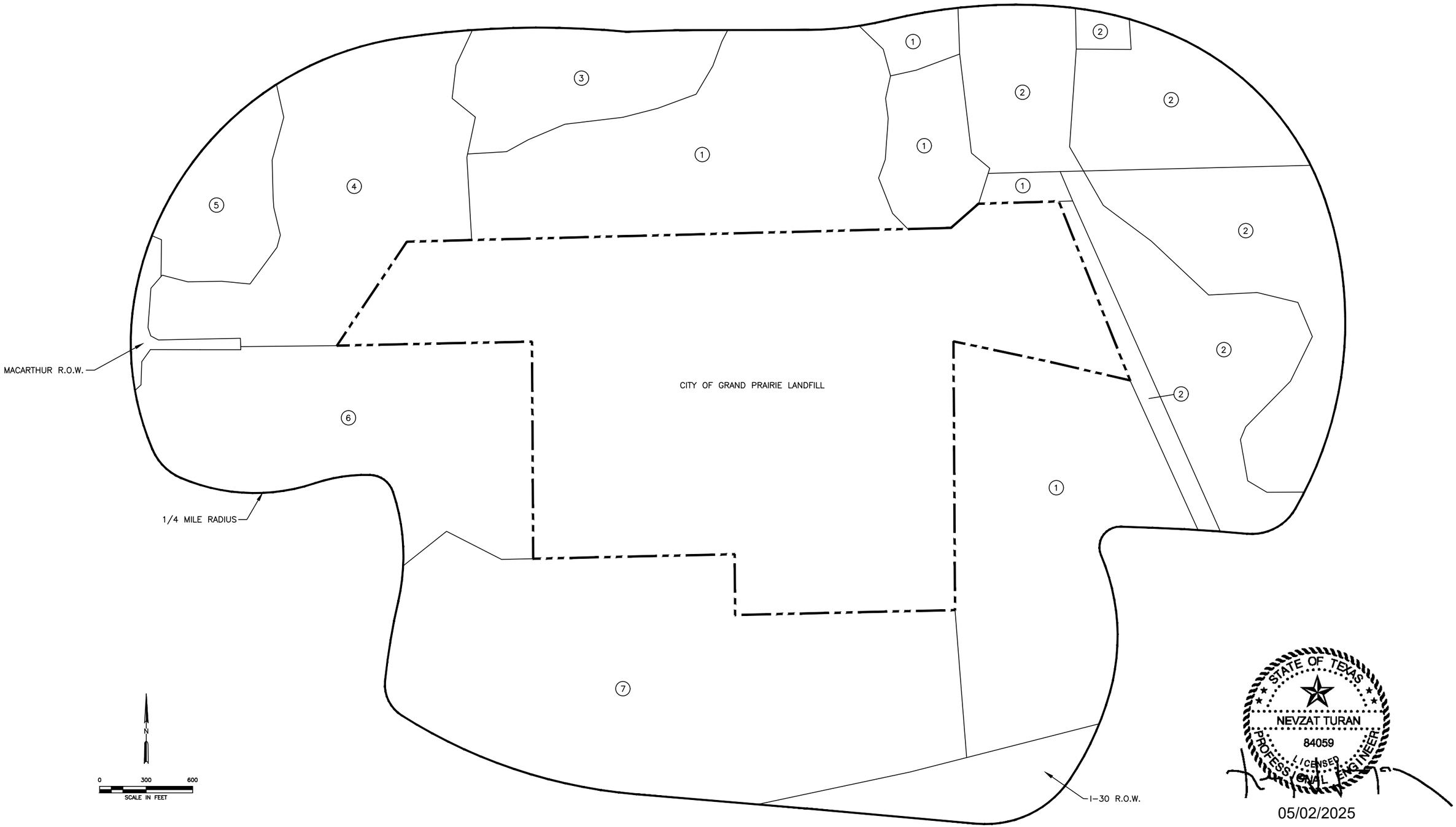
4. T&T ALVARADO PROPERTIES LLC
   800 COUNTY ROAD 209
   ALVARADO TX 76009-8028

5. AL NAYEM INTERNATIONAL
   PO BOX 171887
   DALLAS TX 75217-1165

6. FORTERRA PRESSURE PIPE INC
   C/O DUCHARME MCMILLEN &
   ASSOCIATES
   PO BOX 80615
   INDIANAPOLIS IN 46280-0615

   TPG PRESSURE INC
   DBA THOMPSON PIPE GROUP
   PRESSURE
   3009 N LAUREL AVE
   RIALTO CA 92377-3725

7. PIPE PORTFOLIO OWNER MULTI LP
   C/O WP CAREY INC
   11450 TECHNOLOGY CIRCLE
   JOHNS CREEK GA 30097-1504



LEGEND

PERMIT BOUNDARY

PROPERTY BOUNDARY

(1) REFERS TO LANDOWNER'S LIST ON PAGE I/II- E-2 (SEE NOTE 1)

NOTE:

1. PROPERTY BOUNDARIES REPRODUCED FROM DALLAS CENTRAL APPRAISAL DISTRICT PROPERTY MAP, LOCATED AT HTTPS://MAPS.DCAD.ORG/PRD/DPM/ ACCESSED ON 04-30-2025.

STATE OF TEXAS
NEVZAT TURAN
84059
LICENSED
PROFESSIONAL ENGINEER

05/02/2025

- [ ] DRAFT
- [x] FOR PERMITTING PURPOSES ONLY
- [ ] ISSUED FOR CONSTRUCTION

DATE: 05/2025
FILE: 0628-01-11
CAD: FIG E-1-LANDOWNERS MAP.DWG

DRAWN BY: RAA
DESIGN BY: KR
REVIEWED BY: NT

Weaver Consultants Group

PREPARED FOR
CITY OF GRAND PRAIRIE

REVISIONS		
NO.	DATE	DESCRIPTION

LAND OWNERSHIP MAP

CITY OF GRAND PRAIRIE LANDFILL
DALLAS COUNTY, TEXAS

WWW.WCGRP.COM

FIGURE E-1