



Texas Commission on Environmental Quality

Waste Permits Division Correspondence

Cover Sheet

Date: 27 October 2025

Facility Name: Caesars Plaza

Permit or Registration No.: 62058

Nature of Correspondence:

☐ Initial/New

☐ Response/Revision to TCEQ Tracking No.:
_____ (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: Additional info for NOD response; Tracking No. 31656747	

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:	

ATTACHMENT A

MARKED (“REDLINE”) APPLICATION REPLACEMENT

PAGES – REVISION 3.5

The owner or lessee of the development will provide equipment for monitoring the on-site structure. Monitoring of the onsite structure will include a permanently installed monitoring probe and a continuous monitoring system. The structure located on top of the waste area shall be monitored on a continuous basis, and monitoring equipment shall be designed to trigger an audible alarm if the volumetric concentration of methane in the sampled air is greater than 1% within the venting pipe or permeable layer, and/or inside the structure. Areas of the structure where gas may accumulate will be monitored. Gas monitoring and control systems will be modified as needed to reflect modifications to the structure.

All sampling results will be placed in the operating record of the facility and be made available for inspection by the executive director, and any local pollution agency with jurisdiction that has requested to be notified. If methane gas levels exceeding the limits are detected, the owner, operator, or lessee shall notify the executive director and take action.

The ponding of water over waste in the closed MSW landfill will be prevented. Ponded water that occurs on a closed MSW landfill unit will be eliminated as quickly as possible. The area in which ponded water occurs will be filled in and re-graded within seven days of the occurrence, as required by 30 TAC §330.961(d).

Surface drainage in and around the structure will be controlled to minimize surface water running onto, into, and off the closed MSW landfill.

Groundwater monitoring may be required by the TCEQ Executive Director and, if required, must be conducted in accordance with the requirements of Chapter 330, Subchapter J, as required by 30 TAC §330.961(f).

All conduits intended for the transport or carrying of fluids over or within the closed MSW landfill will be double-containment. This could include the use of double-walled pipes or 2 ft of compacted, clay-rich soil with a permeability not greater than 1×10^{-7} cm/sec will be placed in the base of the trench and a HDPE 30-mil sealed liner will be installed on the bottom and sides of the trench. The conduit for carrying fluids will then be placed above the HDPE liner in the trench and clean backfill added to the sides. The trench and backfill will extend at least two feet in all directions from the utility line (bottom, top, and both sides of the trench). The HDPE liner will extend approximately 1 ft on top of the trench, be overlapped, and sealed. In accordance with §330.453(a) and (b), 18 inches of compacted clayey soil that is free of waste and 6 inches of topsoil that can support native vegetation will be in place for utility trenches in areas that are not covered by building, asphalt, or pavement.

Leaks within conduits will be prevented by installation of said utilities by licensed professionals following all applicable building codes and permits. Evidence of leakage will be inspected quarterly via industry standard methods that include, but may not be limited to, visually inspecting the property for wet spots, lush vegetation (as applicable), sinkholes, and unlevel ground that is inconsistent with site grading. In the unlikely event that a leak is suspected, typical utility leak detection methods will be used. These include acoustic and/or thermal detection, pressure testing of lines, and/or ground penetrating radar. These are not invasive tests. If a leak is detected, then that area would be excavated, the line repaired and then the trench area reconstructed. This would include over-excavation and installation of new liner material with a minimum 6-inch overlap and sealing of the liner to the remaining liner.

Leaks will be repaired by licensed professionals using industry standard excavation and utility repairing methods that will follow all applicable building codes, permits, and this Application. Records of all inspections, testing, and repairs will be maintained on site.

The owner or lessee shall promptly record and retain in the operating record the following information:

- all results from gas monitoring and any remediation plans pertaining to explosive and other gases;
- all unit design documentation for the placement of gas monitoring systems and leachate or gas condensate removal or disposal related to the closed MSW landfill unit;
- copies of all correspondence and responses relating to the development permit;
- all documents relating to the operation and maintenance of the building, facility, or monitoring systems as they relate to the development permit; and
- any other document(s) as specified by the approved development permit or by the executive director.

The owner, operator, or lessee shall provide written notification to the executive director, and any local pollution agency with jurisdiction that has requested to be notified, for each occurrence that documents listed in subsection (h) of this section are placed into or added to the operating record. All information contained in the operating record shall be furnished upon request to the executive director and shall be made available at all reasonable times for inspection by the executive director or his representative.

The following equipment is expected to be used at the structure and a maintenance schedule for this equipment is provided below.

Description	Procedures and Function	Maintenance Schedule
Cleaning/maintenance equipment	General housekeeping/maintenance	As-needed maintenance/cleaning
HVAC	Interior climate control	Semi-annually
Electric water heaters	Hot water control	Annually
Lighting	Interior lighting control	As-needed replacement
IT/Network equipment	Telephone, internet, cameras, etc.	As-needed repair/replacement

The equipment list will be reviewed and updated as needed.

SAFETY AND EVACUATION PLAN

The commercial retail structure will consist of two large rooms. As previously discussed, the VMS beneath each building will be equipped with a methane sensor that will produce both an audible and visual alarm if concentrations of methane beneath the building exceed 1% BV or 20% of the LEL.

By maintaining the potential concentration of methane beneath the building at 1% (or 20% of the LEL), methane cannot accumulate to these levels in the building. Typically, "attenuation" levels through a building slab are 0.03 meaning that even as a worst case, the methane concentrations in the building cannot exceed 33% of 20% of the LEL since the "trigger" will be the methane concentration beneath the building, and not in the building. The interior of building will be equipped with two methane monitors with an audible alarm. In the event that the methane monitor within the VMS detects elevated levels of methane, the VMS vent fans will immediately be turned on (if they were not already running) and monitoring at the sample port will be performed to verify that the concentrations within the building are below the threshold levels.

Building occupants will be notified that the building is located over methane gas, and that controls are in place to minimize the potential danger posed by the methane gas. In the event that the methane monitor inside the building detect elevated levels of methane, alarms will be triggered, and occupants will evacuate the building and only re-enter when conditions are safe. Each living space will be equipped with a graphic

evacuation plan map directing occupants where to go in the event of an alarm including a rally point and contact phone numbers.

LANDFILL GAS SAMPLE PORT MONITORING DATA SHEET

SAMPLE PORT LOCATION ID	SAMPLER NAME	DATE	TIME	METHANE (%)	CARBON DIOXIDE (%)	OXYGEN (%)	OTHER
NOTES (CONDITION/DAMAGE):							
NOTES (CONDITION/DAMAGE):							
NOTES (CONDITION/DAMAGE):							
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UTILITY LINE / CONDUIT LEAK INSPECTION FORM

<u>UTILITY LINE/ CONDUIT</u>	<u>WET SPOT?</u>	<u>LUSH VEGETATION?</u>	<u>SINKHOLE?</u>	<u>UNLEVEL GROUND?</u>
<u>WATER</u>				
<u>NOTES (CONDITION):</u>				
<u>SEWER</u>				
<u>NOTES (CONDITION):</u>				
<u>STORMWATER</u>				
<u>NOTES (CONDITION):</u>				

ATTACHMENT B

UNMARKED APPLICATION REPLACEMENT PAGES –

REVISION 3.5

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