

Sustainability in Action

October 7, 2022

Ms. Megan Henson Municipal Solid Waste Permits Section, MC-124 Texas Commission on Environmental Quality 12100 Park 35 Circle Building A, Room 122 Austin, TX 78753-1808

Re:

Permit Modification – VERDac Alternative Daily Cover Greenwood Farms Landfill – Permit No. MSW-1972A

Smith County, Texas

Dear Ms. Henson:

The purpose of this permit modification is to request the use of VERDac Landfill Cover Pellets as alternative daily cover (ADC) at the referenced facility on a permanent basis. As noted in the status reports submitted to the TCEQ during the trial period, VERDac Landfill Cover Pellets has been used effectively at the site to control vectors, odors, and windblown waste. As requested in the Temporary Authorization Condition 7 of the September 14, 2021 approval letter, the ADC evaluation period covered all four seasons of the year.

To facilitate TCEQ's review, both a redline/strikeout copy (see Attachment 1) and a clean copy (see Attachment 2) have been included in the attached permit modification.

Please process this modification per Title 30 Texas Administrative Code (TAC) §305.70(k)(1) which allows for the use of an alternative daily cover material on a permanent basis.

Additionally, the TCEQ-20650 form which includes the applicants signature page (Page 5) is included in Attachment 4 of the permit modification. In accordance with Title 30 TAC §330.59(h)(1), a \$150 application fee has been submitted to the TCEQ, as documented on Page 1 of the TCEQ-20650 form.

One original and one copy are provided for your use and distribution. Consistent with Title 30 TAC §305.70(f), a copy of this submittal was sent to the TCEQ regional office. A copy of this submittal was placed in the site operating record for this facility.

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

Sincerely,

Austin Sparks, P.E.

Environmental Manager

Attachments: Attachment 1 – SOP Replacement Pages (Redline/Strikeout Copy)

Attachment 2 – SOP Replacement Pages (Clean Copy)

Attachment 3 – VERDac Temporary Authorization Approval Letters

Attachment 4 – TCEQ – 20650 Form

Attachment 5 – Adjacent Landowners List and Map

cc: TCEQ Region 5

Forrest Hunter, Greenwood Landfill TX, LP

Ryne J. Spicer, P.E., Weaver Consultants Group, LLC

ATTACHMENT 1 SOP REPLACEMENT PAGES (REDLINE/STRIKEOUT COPY)

GREENWOOD FARMS LANDFILL SMITH COUNTY, TEXAS TCEQ PERMIT NO. MSW-1972A

PERMIT MODIFICATION

PART IV – SITE OPERATING PLAN APPENDIX IVB ALTERNATIVE DAILY COVER OPERATING PLAN

Prepared for

Greenwood Landfill TX, LP

TCEQ Approved April 26, 2006 Revised September 2012 Revised July 2013 Revised August 2017

Revised October 2022



Prepared by

Weaver Consultants Group, LLC

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

WBC Project No. 0120-080-11-127

ADC SUMMARY

The site is currently approved to use Enviro-Plus, and Quick Cover, and VERDac Landfill Cover Pellets spray-on type ADCs, and synthetic tarp ADC. The ADCOP for the approved ADC materials is provided on the following pages.

Consistent with §330.165(d), a temporary authorization will be submitted for any additional future ADC materials. Consistent with §330.165(d)(2), after a Temporary Authorization to use a new ADC material is approved, a status report for the new ADC material will be submitted on a two-month basis to the TCEQ describing the effectiveness of the alternative material, 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 30 TAC §305.70(k)(1) will be submitted to the TCEQ to obtain permanent approval of the ADC material.

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APPENDIX A

Enviro-Plus

APPENDIX B

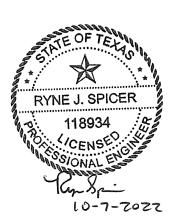
Synthetic Tarps

APPENDIX C

Quick Cover

APPENDIX D

VERDac Landfill Cover Pellets



2 MATERIAL CHARACTERISTICS

2.1 Description of ADC Materials

The following ADC materials may be used at the site.

- Enviro-Plus is produced by Southwest Environment Services, Inc. Enviro-Plus consists of wood and paper fibers, which is mixed with a guar gum tackifier and applied with a hydromulch machine. This ADC spray material will form a crust-like barrier after application. The hardened product is similar to other TCEQ approved ADC materials. Additional information for this material is included in Appendix A.
- Synthetic tarps (i.e., Fabrene® Industrial Synthetic Fabrics Type RTGPN9N9) to be used as ADC material consist of a high density woven polyethylene coated fabric. Panels of the fabric are heat welded together for the desired width. A series of high tensile strength nylon web straps are sewn around the perimeter of the synthetic tarps for added strength. All tarps used as ADC will meet or exceed the material specifications included in Appendix B. The tarps will have a minimum thickness of 0.20 mils.
- Quick Cover is produced by Tascon, Inc. Quick Cover 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 for Quick Cover is included in Appendix C.
- VERDac Landfill Cover Pellets (VERDac) is a spray-applied mulch and mineral mortar slurry product manufactured by LSC Environmental Products, LLC. VERDac Landfill Cover Pellets ADC is a non-flammable blend of mulch and mineral binder providing a thin, non-toxic coating which has been demonstrated as effective for controlling odors, windblown waste, and vectors at numerous facilities.

2.2 Chemical Characteristics

Chemical characteristics of Enviro-Plus, Quick Cover, and the synthetic tarps, and VERDac are included in Appendix A through CD. Enviro-Plus, Quick Cover, and the synthetic tarps, and VERDac are not reactive, ignitable, or corrosive under the expected conditions (e.g., high temperature, intense sunlight).

3 OPERATIONAL METHODS

The following subsections discuss the operational procedures that will be used to employ the approved ADC materials. 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.

3.1 Spray-Type ADCs

The spray-type ADCs included in this plan are Enviro-Plus, and Quick Cover, and VERDac. 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, lusEnviro-Plus, and Quick Cover, and VERDac. Specifically, the mixing ratios and application rates for each of the spray-type ADC materials (refer to Table 3-1 for additional information). This ADCOP includes information on each product in Appendix A for Enviro-Plus and Appendix C for Quick Cover, as well as the MSDS for this each product, however, manufacturer's instructions included with the for each ADC material itself should be followed as well. The MSDS for Enviro-Plus, Quick Cover, and VERDac is included in Appendices A, C, and D, respectively.
- 2. The operator will not operate the hydroseed machine until he the operator has been trained by qualified personnel. Site personnel that are responsible for the application of ADC materials will receive training 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. Then, using the hydroseed machine, the operator will apply the ADC from at least two different directions to achieve a minimum thickness of 0.25 inches over the exposed waste at the working face. The operator will visually inspect the ADC to ensure that the minimum thickness is achieved and that no waste is left exposed. This thickness specification is based on consultation with the TCEQ and suggested manufacturer application rates as demonstrated in Table 3-1. Stormwater that comes in contact with the spray-type ADC will be managed consistent with the requirements for contaminated water in the facility's Leachate and Contaminated Water Plan.

Table 3-1 **ADC Thickness Information**

Product	Approximate Thickness	Density of ADC Material	Actual Application Rate ^{1,3}	Manufacturer's Recommended Application Rate	Acceptable (Actual Application Rate at a thickness of 0.25-inches > Manufacturer's Application Rate)
Enviro- Plus	0.25 in	5 lbs/cf	4,538 lbs/ac	2,000 lbs/ac	Yes
Quick Cover	0.25 in	12.9 lbs/cf	11,707 lb/ac	_2	Yes
VERDac ³	0.25 in	20-35 lbs/cf	5-7.5 ft²/gal	10-15 ft²/gal	Yes

¹ Calculated actual application rate vs. manufacturer's recommended application rate using a thickness of 0.25 in. Calculation for actual application rate using a minimum thickness of 0.25-inches is determined below.

Actual Application Rate = Volume Consumed by ADC Material X Density of ADC

at Active Face (per acre)

Material

3.2 Synthetic Tarp ADC

Using standard landfill equipment and site personnel, the tarp(s) will be placed over the waste. The tarps are weighted around the perimeter by built-in 3/8" chains (1.4 lbs/ft to 1.6 lbs/ft) which are also used for rolling and unrolling the tarp. In addition, the tarps are constructed with 1 inch diameter cables spaced every 10 feet along the length of the tarp to provide additional anchoring weight. Supplemental anchoring will be used when wind speeds of greater than 40 mph are expected (please note that the site will use extreme caution when deciding to use tarps in these conditions and may choose to use 6" of soil or an alternate approved ADC in place of the tarp). Additional anchoring will be used to secure the sides and ends and will include materials such as sand bags weighing 10 lbs minimum. Supplemental anchor spacing will depend on daily conditions (i.e., area of working face covered with tarps, wind, etc.) but will always be sufficient to hold tarps in place. If reusable tarps are used, the tarps will be removed within 24 hours of their application and prior to waste placement. Tarps may be used to cover the entire working face or in combination with soil or other approved ADC material to provide complete

^{= [(0.25} in/12 in/ft) X 43,560 ft²] (Enviro-Plus:5 lbs/cf, Quick Cover: 12.9 lbs/cf)

⁼ Enviro-Plus=4,538 lbs of mixture/acre, Quick Cover=11,707 lbs of mixture/acre

² Manufacturer's recommended application is 0.25 inches over exposed waste.

³ VERDac manufacturer's recommended application rate is 10-15 ft²/gal to achieve 0.125 inches over exposed waste. To achieve 0.25 inches over exposed waste, an application rate of 5-7.5 ft²/gal is required.

4 ADC MATERIAL PERFORMANCE AND INSPECTION PROCEDURES

4.1 ADC Performance

Each of the spray-type ADC materials, Enviro-Plus, and Quick Cover, and VERDac included in this plan have been successfully used at other MSW landfill sites in Texas to control vectors, fires, odors, and windblown litter and waste. This type of ADC forms a crust-like barrier over the waste and this crust-like surface serves as a barrier much like the tarp ADC material. The spray-type ADC materials will control vectors and windblown waste by creating a physical barrier between the atmosphere and waste (e.g., the cohesive nature of the ADC material will prevent windblown waste and the crust-like barrier of Enviro-Plus, and Quick Cover, and VERDac have been proven to prevent vectors). The cohesive nature of the spray-type ADC also minimizes the airflow between the active face and the atmosphere, which minimizes the fire hazard and odor potential.

The synthetic tarp ADC material specified in this plan serves as a physical barrier over waste. The synthetic tarp ADC will control vectors, windblown waste, and odor, and will minimize fire hazards by creating a physical barrier between the atmosphere and waste. The tarps are not flammable, are sufficiently heavy, and will be properly anchored to remain positioned over waste when in use.

4.2 Verification and Inspection Procedures

At the end of each working day, landfill personnel will inspect the working face to confirm that an approved ADC has been placed over the working face in accordance with this ADCOP. Landfill personnel will routinely assess the effectiveness of each ADC in controlling vectors, fires, odors, and windblown waste. Daily application of ADC will be documented and maintained in the site operating records.

In the event that the ADC does not control vectors, fires, odors, or windblown waste, then the ADC application process will be re-evaluated to ensure that this ADC material adequately covers the working face and serves its intended purpose. Any required changes to the ADC operational procedures will be authorized through a permit modification.

APPENDIX D VERDAC LANDFILL COVER PELLETS



SDS

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

VERDac Landfill Cover Pellets

Page 1 of 4

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.

Hazards Identification

Route of Entry: Eye Contact, Skin Contact, Inhalation

Hazards: Eye: May cause mechanical irritation. Skin: May cause mild skin 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.



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

VERDac Landfill Cover Pellets

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Inhalation may aggravate existing respiratory illness.

Fire Fighting Measures

Flammability:

Combustible product

Auto-ignition Temp:

400-500 F

Fire Extinguishing Media:

Water, Carbon Dioxide, Sand.

Accidental Release Measures

Personal Precaution:

Avoid breathing dust; wear respirator approved for silica bearing dust. Vacuum to avoid generating airborne dust. Avoid using water. Material

becomes slippery when wet.

Handling and Storage

Handling:

Cleanup:

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.

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 Respirable Dust 15 mg/m³ 5 mg/m^3

N/A 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.



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

VERDac Landfill Cover Pellets

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Respiratory Protection:

When handling generates dust levels above exposure limits, use respirators approved by NIOSH/MSHA for

silica bearing dust.

Physical and Chemical Properties

Appearance:

Green Pellets

Odor:

Physical State:

Granular Mixture of Cellulose Fiber, Corn Fiber, Sodium

Montmorillonite Clay, Proprietary Ingredients, Dye

Specific Density:

20-35#'s/ft3 (approximate)

Specific Gravity: Solubility in Water:

N/A <2%

Vapor Pressure (mm Hg):

N/A

10 Stability and Reactivity

Stability:

Conditions to Avoid:

Avoid open flame. Store in dry areas.

Materials to Avoid:

N/A

Hazardous Polymerization:

No.

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.



SDS

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

VERDac Landfill Cover Pellets

Page 4 of 4

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.

ATTACHMENT 2 SOP REPLACEMENT PAGES (CLEAN COPY)

GREENWOOD FARMS LANDFILL SMITH COUNTY, TEXAS TCEQ PERMIT NO. MSW-1972A

PERMIT MODIFICATION

PART IV – SITE OPERATING PLAN APPENDIX IVB ALTERNATIVE DAILY COVER OPERATING PLAN

Prepared for

Greenwood Landfill TX, LP

TCEQ Approved April 26, 2006 Revised September 2012 Revised July 2013 Revised August 2017

Revised October 2022

RYNE J. SPICER
118934
CENSE
CONSTRUCTION
10 3-7377

Prepared by

Weaver Consultants Group, LLC

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

WBC Project No. 0120-080-11-127

ADC SUMMARY

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	4.2	Verification and Inspection Procedures	IVB-6

APPENDIX A

Enviro-Plus

APPENDIX B

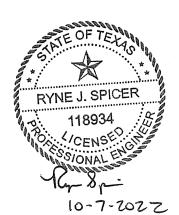
Synthetic Tarps

APPENDIX C

Quick Cover

APPENDIX D

VERDac Landfill Cover Pellets



2 MATERIAL CHARACTERISTICS

2.1 Description of ADC Materials

The following ADC materials may be used at the site.

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Chemical characteristics of Enviro-Plus, Quick Cover, synthetic tarps, and VERDac are included in Appendix A through D. Enviro-Plus, Quick Cover, synthetic tarps, and VERDac are not reactive, ignitable, or corrosive under the expected conditions (e.g., high temperature, intense sunlight).

3 OPERATIONAL METHODS

The following subsections discuss the operational procedures that will be used to employ the approved ADC materials. 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.

3.1 Spray-Type ADCs

The spray-type ADCs included in this plan are Enviro-Plus, Quick Cover, and VERDac. 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, Enviro-Plus, Quick Cover, and VERDac. Specifically, the mixing ratios and application rates for each of the spray-type ADC materials (refer to Table 3-1 for additional information). This ADCOP includes the MSDS for each product, however, manufacturer's instructions for each ADC material should be followed as well. The MSDS for Enviro-Plus, Quick Cover, and VERDac is included in Appendices A, C, and D, respectively.
- 2. The operator will not operate the hydroseed machine until the operator has been trained by qualified personnel. Site personnel that are responsible for the application of ADC materials will receive training 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. Then, using the hydroseed machine, the operator will apply the ADC from at least two different directions to achieve a minimum thickness of 0.25 inches over the exposed waste at the working face. The operator will visually inspect the ADC to ensure that the minimum thickness is achieved and that no waste is left exposed. This thickness specification is based on consultation with the TCEQ and suggested manufacturer application rates as demonstrated in Table 3-1. Stormwater that comes in contact with the spray-type ADC will be managed consistent with the requirements for contaminated water in the facility's Leachate and Contaminated Water Plan.

Table 3-1
ADC Thickness Information

Product	Approximate Thickness	Density of ADC Material	Actual Application Rate ^{1,3}	Manufacturer's Recommended Application Rate	Acceptable (Actual Application Rate at a thickness of 0.25-inches > Manufacturer's Application Rate)
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Quick Cover	0.25 in	12.9 lbs/cf	11,707 lb/ac	_2	Yes
VERDac ³	0.25 in	20-35 lbs/cf	5-7.5 ft²/gal	10-15 ft²/gal	Yes

¹ Calculated actual application rate vs. manufacturer's recommended application rate using a thickness of 0.25 in. Calculation for actual application rate using a minimum thickness of 0.25-inches is determined below.

Actual Application Rate = Volume Consumed by ADC Material X Density of ADC

at Active Face (per acre)

Material

3.2 Synthetic Tarp ADC

Using standard landfill equipment and site personnel, the tarp(s) will be placed over the waste. The tarps are weighted around the perimeter by built-in 3/8" chains (1.4 lbs/ft to 1.6 lbs/ft) which are also used for rolling and unrolling the tarp. In addition, the tarps are constructed with 1 inch diameter cables spaced every 10 feet along the length of the tarp to provide additional anchoring weight. Supplemental anchoring will be used when wind speeds of greater than 40 mph are expected (please note that the site will use extreme caution when deciding to use tarps in these conditions and may choose to use 6" of soil or an alternate approved ADC in place of the tarp). Additional anchoring will be used to secure the sides and ends and will include materials such as sand bags weighing 10 lbs minimum. Supplemental anchor spacing will depend on daily conditions (i.e., area of working face covered with tarps, wind, etc.) but will always be sufficient to hold tarps in place. If reusable tarps are used, the tarps will be removed within 24 hours of their application and prior to waste placement. Tarps may be used to cover the entire working face or in combination with soil or other approved ADC material to provide complete

Weaver Consultants Group, LLC

^{= [(0.25} in/12 in/ft) X 43,560 ft²] (Enviro-Plus:5 lbs/cf, Quick Cover: 12.9 lbs/cf)

⁼ Enviro-Plus=4,538 lbs of mixture/acre, Quick Cover=11,707 lbs of mixture/acre

² Manufacturer's recommended application is 0.25 inches over exposed waste.

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4 ADC MATERIAL PERFORMANCE AND INSPECTION PROCEDURES

4.1 ADC Performance

Each of the spray-type ADC materials, Enviro-Plus, Quick Cover, and VERDac, included in this plan have been successfully used at other MSW landfill sites in Texas to control vectors, fires, odors, and windblown litter and waste. This type of ADC forms a crust-like barrier over the waste and this crust-like surface serves as a barrier much like the tarp ADC material. The spray-type ADC materials will control vectors and windblown waste by creating a physical barrier between the atmosphere and waste (e.g., the cohesive nature of the ADC material will prevent windblown waste and the crust-like barrier of Enviro-Plus, and Quick Cover, and VERDac have been proven to prevent vectors). The cohesive nature of the spray-type ADC also minimizes the airflow between the active face and the atmosphere, which minimizes the fire hazard and odor potential.

The synthetic tarp ADC material specified in this plan serves as a physical barrier over waste. The synthetic tarp ADC will control vectors, windblown waste, and odor, and will minimize fire hazards by creating a physical barrier between the atmosphere and waste. The tarps are not flammable, are sufficiently heavy, and will be properly anchored to remain positioned over waste when in use.

4.2 Verification and Inspection Procedures

At the end of each working day, landfill personnel will inspect the working face to confirm that an approved ADC has been placed over the working face in accordance with this ADCOP. Landfill personnel will routinely assess the effectiveness of each ADC in controlling vectors, fires, odors, and windblown waste. Daily application of ADC will be documented and maintained in the site operating records.

In the event that the ADC does not control vectors, fires, odors, or windblown waste, then the ADC application process will be re-evaluated to ensure that this ADC material adequately covers the working face and serves its intended purpose. Any required changes to the ADC operational procedures will be authorized through a permit modification.

APPENDIX D VERDAC LANDFILL COVER PELLETS



SDS

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

VERDac Landfill Cover Pellets

Page 1 of 4

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.

Hazards Identification

Route of Entry:

Hazards:

Eye Contact, Skin Contact, Inhalation Eye:

Skin:

May cause mechanical irritation. May cause mild skin irritation.

Inaestion:

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.

Composition / Information on Ingredients 3

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.

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.



SDS

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

VERDac Landfill Cover Pellets

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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.

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.

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/m³ 1 mg/m³ 0.1 mg/m^3

Wood Dust

i mg

 1 mg/m^3

Particles Not Otherwise Regulated

Total Dust Respirable Dust 15 mg/m³ 5 mg/m³

N/A 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.



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

VERDac Landfill Cover Pellets

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Respiratory Protection:

When handling generates dust levels above exposure limits, use respirators approved by NIOSH/MSHA for

silica bearing dust.

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

:Ha

5.5-7.0

Specific Density:

20-35#'s/ft3 (approximate)

Specific Gravity: Solubility in Water: N/A <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.



SDS

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

VERDac Landfill Cover Pellets

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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.

ATTACHMENT 3 VERDAC TEMPORARY AUTHORIZATION APPROVAL LETTERS

Jon Niermann, *Chairman*Emily Lindley, *Commissioner*Bobby Janecka, *Commissioner*Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 14, 2021

Mr. Austin Sparks, P.E. Environmental Manager Republic Services 12920 FM 2767 Tyler, Texas 75708

Subject: Greenwood Farms Landfill - Smith County

Municipal Solid Waste (MSW) - Permit No. 1972A

Temporary Authorization - Approved

Tracking No. 26513861; RN102533171/CN602847071

Dear Mr. Sparks:

We have reviewed your request dated August 17, 2021 and revisions dated September 7, 2021, for a temporary authorization for the above-referenced facility to use VERDac Landfill Cover Pellets from LSC Environmental Products, LLC on a trial basis to evaluate their 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.

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. Jason P. Baiocchi at (512) 239-0562, by email at Jason.Baiocchi@tceq.texas.gov, 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,

Chance Goodin, Manager

Municipal Solid Waste Permits Section

Waste Permits Division

Texas Commission on Environmental Quality

CG/JPB/tw

cc: Chad Ellinger, Civil & Environmental Consultants, Inc., Houston

Enclosure[s]

Texas Commission on Environmental Quality



Temporary Authorization Municipal Solid Waste Permit No. 1972A Greenwood Landfill Tx, LP – Greenwood Farms Landfill

Municipal Solid Waste (MSW) Permit No. 1972A is hereby authorized as follows:

Description of Temporary Authorization:

Greenwood Farms Landfill, MSW Permit No. 1972A 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 5 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. Type of ADC material to be used during this trial period shall be limited to the following:
 - VERDac Landfill Cover Pellets 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 the ADC 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. 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 August 17, 2021, and the revisions dated September 7, 2021, 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: September 14, 2021

For the Commission

Jon Niermann, *Chairman*Emily Lindley, *Commissioner*Bobby Janecka, *Commissioner*Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 16, 2022

Mr. Austin Sparks, P.E. Environmental Manager Republic Services 12920 FM 2767 Tyler, Texas 75708

Subject: Greenwood Farms Landfill - Smith County

Municipal Solid Waste (MSW) - Permit No. 1972A

Temporary Authorization - One-Time Extension Approved Tracking No. 27334576; RN102533171/CN602847071

Dear Mr. Sparks:

We have reviewed your submittal dated February 21, 2022, requesting an additional 180-day temporary authorization (TA) to use VERDac Landfill Cover Pellets on a trial basis to evaluate their effectiveness as an alternate daily cover (ADC) material. The facility's initial TA was issued on September 14, 2021. 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. Jason Peter Baiocchi by phone at (512) 239-0562, by email at Jason.Baiocchi@tceq.texas.gov, 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,

Chance Goodin, Manager

cood:

Municipal Solid Waste Permits Section

Waste Permits Division

Texas Commission on Environmental Quality

CG/JPB/tw

cc: Chad Ellinger, P.E., Weaver Consultants Group

Enclosure

Texas Commission on Environmental Quality



Temporary Authorization Municipal Solid Waste Permit No. 1972A Greenwood Landfill Tx, LP – Greenwood Farms Landfill

Municipal Solid Waste (MSW) Permit No. 1972A is hereby authorized as follows:

Description of Temporary Authorization:

Greenwood Farms Landfill, MSW Permit No. 1972A 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 5 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 extended trial period shall be limited to the following:
 - VERDac Landfill Cover Pellets by LSC Environmental Products, LSC
- 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 the ADC and from 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 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

Temporary Authorization MSW Permit No. 1972A Page 2 of 2

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 August 17, 2021, revisions dated September 7, 2021, and the extension request dated February 21, 2022, 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 16, 2022

For the Commission

ATTACHMENT 4 TCEQ-20650 FORM



Texas Commission on Environmental Quality

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

Application Tracking Information

Facility Name: Greenwood Farms Landfill Permittee or Registrant Name: Greenwood Landfill TX, LP MSW Authorization Number: 1972A Initial Submission Date: 10/2022 Revision Date: Instructions for completing this form are provided in form TCEQ-20650-instr¹. If you have			
questions, contact the Municipal Solid Waste Permits Section by email to mswper@tceq.texas.gov , or by phone at 512-239-2335. Application Data			
1. Submission Type			
■ Initial Submission			
2. Authorization Type			
■ Permit			
3. Application Type			
■ Modification with 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 <u>www3.tceq.texas.gov/epay/</u>			
If paid online, enter ePay Trace Number: 582EA000506038			

 $^{^1\} www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/20650-instr.pdf$

5. Application URL
For modifications that require notice (other than those for arid exempt landfills), provide the URL address of a publicly accessible internet web site where the application and all revisions to the application will be posted: www.ftwweaverboos.com
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: Ryne Spicer, P.E. Title: Project Director
Email Address: rspicer@wcgrp.com
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: Greenwood Farms Landfill Contact Name: Forrest Hunter MSW Authorization Number (if existing): 1972A Regulated Entity Reference Number: RN 102533171 Physical or Street Address: 12920 FM 2767 City: Tyler County: Smith State: TX Zip Code: 75708 Phone Number: 903-566-5007 Latitude (Degrees, Minutes Seconds): 32° 22' 21" Longitude (Degrees, Minutes Seconds): 95° 11' 18"
9. Facility Types
■ Type I □ Type IV □ Type V
Type IAF Type IVAF 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 add the use of VERDac Landfill Cover Pellets Alternative Daily Cover (ADC) at the site on a permanent basis in accordance with 30 TAC §305.70(k)(1).

11. Facility Contact Informatio	n		
Site Operator (Permittee or Regist	rant)		
Name: Greenwood Landfill TX, LP			
Customer Reference Number: CN 6028	347071		
Contact Name: Austin Sparks	Title	: Environmental	Manager
Mailing Address: 12920 FM 2767			
City: Tyler County	/: Smith	State: TX	Zip Code: <u>75708</u>
Phone Number: 903-539-7986			
Email Address: asparks3@republics			
Texas Secretary of State (SOS) Filing I	Number: 001422	3811	
Operator (if different from Site Ope	erator)		
Name: Same as Site Operator			
Customer Reference Number: CN			
Contact Name:	Title	:	
Mailing Address:			
City: County	y:	State:	Zip Code:
Phone Number:			
Email Address:		Section of the Assessment	
Texas Secretary of State (SOS) Filing I	Number:		

Consultant (if applicable)
Firm Name: Weaver Consultants Group, LLC
Consultant Name: Ryne Spicer, P.E.
Texas Board of Professional Engineers Firm Registration Number: F-3727
Contact Name: Ryne Spicer, P.E. Title: Project Director
Mailing Address: 6420 Southwest Blvd., Suite 206
City: Fort Worth County: Tarrant State: TX Zip Code: 76109
Phone Number: 817-735-9770
Email Address: rspicer@wcgrp.com
Agent in Service (required for out-of-state applicants)
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: State: X Zip Code:
Phone Number:
Email Address:

Signature Page

Site Operator or Authorized Signatory

Austin Snarks

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.

- Fnyironmental Manager

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	5
Landowners List	5
Marked (Redline/Strikeout) Pages	1
Unmarked Revised Pages	2 .

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	

ATTACHMENT 5 ADJACENT LANDOWNERS LIST AND MAP

ADJACENT LANDOWNERS LIST AND MAP

The following list in Table 5-1 and map on Figure 5-1 provide the names, mailing addresses, and location of the "Adjacent and Potentially Affected Landowners" within 0.25 miles of the site. Refer to Figure 5-1, Adjacent Property Owner Map, for location of the properties. The numbering on the Adjacent Property Owner List in Table 5-1 corresponds to the numbers listed on Figure 5-1. The list was compiled by Weaver Consultants Group in September 2022. The list is based on records of the Smith County Appraisal District, posted on the Smith County Appraisal District website http://www.smithcad.org/wab/.

In accordance with Title 30 Texas Administrative Code §330.59(c)(3), the availability of mineral ownership beneath the facility has been investigated. The real property appraisal records do not show any mineral rights owners.

5-1

TABLE 5-1 ADJACENT LANDOWNERS LIST

1.	CITY OF TYLER ATTN: CITY CLERK P.O. BOX 2039 TYLER, TX 75710-2039	11.	SERGIO LARA CARACHURE 3434 CR 3157 TYLER TX 75708
2.	DARRELL K JACKSON 12765 FM 2767 TYLER TX 75708-5026	12.	NICHOLAS BARRY WILSON & LAYLA A WILSON 7169 MEADOW BROOKE WAY NORTHFIELD OH 44067
3.	JOHN & JAMEY VANDERWEGE 12729 FM 2767 TYLER TX 75708-5026	13.	MARSHALL & AMANDA SCOTT 3470 CR 3157 TYLER TX 75708-5000
4.	JOHNNY D & JOYCE M JONES 12729 FM 2767 TYLER, TX 75708-5026	14.	EARNESTINE WARREN 3912 CR 3157 TYLER TX 75708-5003
5.	BILLY CLYDE HERRING 12883 FM 2767 TYLER, TX 75708	15.	NAOMI WASHINGTON 3912 CR 3157 TYLER TX 75708-5003
6.	PEDRO MENDEZ GAONA & PEDRO MENDEZ SOSA IN CARE OF & BERTHA MENDEZ MAYA 9323 CEDARVALE DR TYLER, TX 75708-7223	16.	DREW BARRON 13745 CR 26 TYLER TX 75707
7.	FRANCISCA BORJA CORNEJO LIFE ESTATE 12917 FM 2767 TYLER TX 75708-5028	17.	JAMES E MOBLEY 1800 W BARRETT ST TYLER TX 75702-3018
8.	JIMMY W MURPHY ET AL PO BOX 24455 HOUSTON TX 77229	18.	KEVIN MOBLEY 3839 SENIC DR TYLER TX 75709-5403
9.	ANGEL A AMAYA 12025 CR 46 TYLER TX 75704	19.	KEARY MOBLEY 5914 BRYNMAR CT TYLER TX 75703
10.	DAVID G & DREMA L DOMAIN 3414 CR 3157 TYLER TX 75708	20.	SONYA MOBLEY %SONYA KENNEDY 14265 FM 2767 TYLER TX 75708

21.	SHERRYLL HARVEY 14277 FM 2767 TYLER TX 75708-5040	31.	JOYCE CHANDLER 14183 FM 2767 TYLER TX 75708-5039
22.	ANTOINETTE SHERMAN 12449 COUNTY ROAD 468 TYLER TX 75706-5607	32.	ST VIOLET BAPTIST CHURCH PO BOX 132122 TYLER TX 75713-2122
23.	JAMES A MOBLEY 2014 EDEN DR LONGVIEW TX 75601	33.	DREW BARRON 13745 CR 26 TYLER TX 75707
24.	MAGDALENO MARTINEZ 3629 FM 2908 TYLER TX 75708-0000	34.	JOSE LUIS LESEA 4041 FM 2908 TYLER TX 75708-0000
25.	JOSE JOHNSON 14155 FM 2767 TYLER TX 75708-5039	35.	JOANNA S BOLTES 3893 FM 2908 TYLER TX 75708-0000
26.	ANGELA JOHNSON ROGERS 3543 FM 2908 TYLER TX 75708-5124	36.	STATE OF TEXAS PO BOX 1700 AUSTIN TX 78767-0000
27.	JOHNNIE MAE MOBLEY 3537 FM 2908 TYLER TX 75708-5124	37.	OLLIE FAY OLIVER 3803 FM 2908 TYLER TX 75708-5127
28.	MARLIN L BEAL SR 14383 FM 2767 TYLER TX 75705-0000	38.	HENRY EARL & ROSE MARIE CHOICE 3635 FM RD 2908
29.	JOSE MANUEL NAJERA & HEIDY CLAUDETT 3023 BENBROOK DR TYLER TX 75702	39.	TYLER TX 75708 CHARLES & GENEVA JOHNSON 3984 FM 2908 TYLER TX 75708-5114
30.	JOHNSON MARCUS 5540 LAVACA RD GRAND PRAIRIE TX 75702	40.	NORA SANDERS 591 VZ COUNTY ROAD 4925 BEN WHEELER TX 75754

41	TARE-WICKWARE WILMA JEAN & DONALD KEITH TARE C/O GWINDELL & STEVIE WAYNE TARE 14453 CR 3159 TYLER TX 75708	51.	MARYLAND RUTH KENNEDY 14475 COUNTY ROAD 3158 TYLER TX 75708-5102
42	IMOGENE JACKSON 14473 COUNTY RD 3159 TYLER TX 75708-5106	52.	LEONARD KENNEDY 16410 ST HWY 31 E TYLER TX 75705-0000
43	KENNETH SMITH TAVE 14491 COUNTY ROAD 3159 TYLER TX 75708-5106	53.	KENNEDY FAMILY REVOCABLE LIVING TRUST BILLY J & EVELYN H KENNEDY CO- TRUSTEES 14482 COUNTY ROAD 3159 TYLER TX 75708-5104
44	JENNIFER ALVIZU 510 E LOOP 281 STE B LONGVIEW TX 75605	54.	DOROTHY JOHNSON 14498 COUNTY ROAD 3159 TYLER TX 75708
45	RICHARD E MCCOWIN 14444 COUNTY ROAD 3159 TYLER TX 75708-5104	55.	J C GAINS 14514 COUNTY ROAD 3159 TYLER TX 75708-5105
46	SAMUEL MACIAS 14464 COUNTY ROAD 3159 TYLER TX 75708-4801	56.	MAY PEARL & RICHARD D PRYOR 3534 FM 2908 TYLER TX 75708-5111
47	BILLY JOE & EVELYN HOLLIS KENNEDY 14482 COUNTY ROAD 3159 TYLER TX 75708-5104	57.	ADRIAN BROWN 2734 SPRING CANYON CT HOUSTON TX 77067-1137
48	DIEGO N LOREDO TORRES 14498 COUNTY ROAD 3159 TYLER TX 75708-0000	58.	ALLEN CHARLES & FELICITA DUNN 14474 CR 3158 TYLER TX 75708
49	GAINES J C ESTATE & MYRTICE 14514 COUNTY ROAD 3159 TYLER TX 75708-5105	59.	MARY HOWARD NEWSOME 14426 FM 2767 TYLER TX 75705-0000
50	DAVID E MCCLEVELAND 1429 N FANNIN AVE TYLER TX 75702-4575	60.	VERNON CADDELL 7714 HWY 110 NORTH TYLER TX 75704-0000

61.	ST TITUS GOSPEL OF CHRIST 14383 FM 2767 TYLER TX 75705-2703	71.	GRACE COMMUNITY FOUNDATION 1828 ESE LOOP 323 #300 TYLER TX 75701
62.	MARLYN L & RUTH HAZEL BEAL 14383 FM 2767 TYLER TX 75705-2703	72.	FED HOLMES ESTATE 14344 FM 2767 TYLER TX 75705-2702
63.	JACK NEELY 14397 FM RD 2767 TYLER TX 75705-2703	73.	WESLEY D HARVEY 2280 FM 2908 TYLER TX 75705-2722
64.	MARY HOWARD 14425 FM 2767 TYLER TX 75705-2705	74.	TROY L RAINEY PO BOX 131259 TYLER TX 75713
65.	JUAN CARLOS PEREZ 14439 FM 2767 TYLER TX 75705	75.	WILLIAM H & JANET RAINEY LIFE ESTATE 2276 FM 2908 TYLER TX 75705-2722
66.	ESTELLA BATTLES 14473 FM 2767 TYLER TX 75705-2705	76.	TROY & DELIA RAINEY PO BOX 131259 TYLER TX 75713
67.	LOUISE AUSTIN 824 STAIN GLASS DR DESOTO TX 75115-6060	77.	KATHY & DENISE DAVENPORT 853 MT PLEASANT CUT OFF HALLSVILLE TX 75650-0000
68.	PAUL & JACQUELINE SUELL 14523 FM 2767 TYLER TX 75705-2707	78.	3-T EXPLORATION INC ATTN: THOMAS TY THACKER 3707 MAPLEWOOD AVE STE 100 WICHITA FALLS TX 76308-0000
69.	DARYLE & COLLEEN MULLENS 14546 FM 2767 TYLER TX 75701-0000	79.	WILLIE DALLAS BARBER III 3319 GREG LN TYLER TX 75701-7331
70.	JUAN & FLOR IBARRA 14494 FM 2767 TYLER TX 75705-2704	80.	LOLA V RICHARDSON 1192 FM 2908 TYLER TX 75705-2714

- 81. SYLVIE MICHAELA GEER 512 STANFORD ST TYLER TX 75701
- 82. JOYCE MANESS 9269 FARM ROAD 137 PARIS TX 75460-8113
- 83. PATRICIA MARIE HEARD PO BOX 8063 TYLER TX 75711-8063
- 84. DOLORES GARCIA 522 FM 2908 TYLER TX 75705-0000
- 85. GEORGE E & SANDRA G MCCOWIN 502 FM 2908 TYLER TX 75705-0000
- 86. LEX L KIDD 102 N COLLEGE STE 707 TYLER TX 75702
- 87. MIKE ROWE & JANICE 14170 STATE HIGHWAY 31 E TYLER TX 75705-2526
- 88. MICHAEL GLENN & JANICE ROWE 14170 STATE HIGHWAY 31 E TYLER TX 75705-2526
- 89. LEONARD THOMAS & REBEKAH L WALKER 14110 HWY 31 EAST TYLER TX 75705-2526
- 90. CLIFFORD DEAN & REBECCA A
 LASSETER
 13988 HIGHWAY 31 E
 TYLER TX 75705-2522

- 91. JOSE FERNANDO GALVAN 13892 HIGHWAY 31 E TYLER TX 75705
- 92. HUBERT E & L LEE KIDD 102 N COLLEGE STE 106 TYLER TX 75702
- 93. DPH MANAGEMENT CO LLC 705 MEADOW CREEK DR TYLER TX 75703

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FIGURE 5-1

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