



Sustainability in Action

December 2, 2022

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

Re: Response to Comments
Permit Modification – Annual Waste Acceptance Rate
San Angelo Landfill – Permit No. MSW-79
Tom Green County, Texas
Tracking No. 27878605

Dear Ms. Howard:

On behalf of the City of San Angelo (Owner) and Republic Waste Services of Texas, Ltd. (Operator), please find attached one original and three copies of the replacement pages for the referenced permit modification. The attached replacement pages were developed to incorporate comments included in your email dated November 8, 2022. This response letter contains each comment identified by the TCEQ (in bold) and a response to each.

- 1. The page numbers for sections 3.2 and 3.5 in Part B are inconsistent with the Table of Contents. Please revise accordingly.**

Response:

The page numbers for Sections 3.2 and 3.5 in Part B have been revised for consistency. The Table of Contents has been revised to indicate that Section 3.5 is located on Page 22.

- 2. In Part IV, Figure 3.1, and Sections 3.1, 3.3, and 8.1, change all instances of “Trashaway Waste Services, Inc.” to “Republic Waste Services of Texas, Ltd.”**

Response:

The referenced figure and sections in Part IV have been revised accordingly.

3. **Attachment 18 indicates there are two entrances to the landfill (one public and one service). Part IV, Section 8 of the existing permit indicates there are four entrances to the landfill (one public and three service). Revise for consistency.**

Response:

The facility has one existing gated site entrance off Old Ballinger Highway and two existing gated service entries located on the southeast and northeast corners of the site. All waste hauling vehicles (public and private) enter the facility through the gated site entrance. The gated service entry on the southeast corner of the site is not in use, but is available in the event authorized site personnel need to enter or exit at that location. The gated service entry on the northeast corner of the site is only used for construction vehicles (authorized contractors or site personnel).

For clarification, Part IV, Section 8 (Page IV-28) has been revised to remove reference to the service entry on the southwest corner of the site and to remove reference to transportation of waste (dead animals and slaughterhouse waste) through this entry. No changes were made to Attachment 18 as the purpose of this attachment is to demonstrate coordination with TxDOT San Angelo District in accordance with Title 30 TAC §330.61(i) for the adequacy of site access roads within one mile of the facility.

If you have any questions or require further information, please call.

Sincerely,

Republic Waste Services of Texas, Ltd.

Brian Danko

Brian Danko
Environmental Manager

Attachments: Attachment 1 – Replacement Pages (Redline/Strikeout Version)
Attachment 2 – Replacement Pages (Clean Version)
Attachment 3 – TCEQ-20650 Form

cc: TCEQ Region 8 Office
Shane Kelton, City of San Angelo
Ryne J. Spicer, P.E., Weaver Consultants Group

ATTACHMENT 1
REPLACEMENT PAGES
(REDLINE/STRIKEOUT VERSION)

**SAN ANGELO LANDFILL
TOM GREEN COUNTY, TEXAS
TCEQ PERMIT NO. MSW 79
PERMIT MODIFICATION
PART B – TECHNICAL REPORT**



Prepared for

City of San Angelo (Owner)

and

Republic Waste Services of Texas, Ltd. (Operator)

August 1983

Revised ~~September~~ November 2022

Prepared by

Weaver Consultants Group, LLC
6420 Southwest Boulevard, Suite 206
Fort Worth, Texas 76109
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WCG Project No. 0120-686-11-31

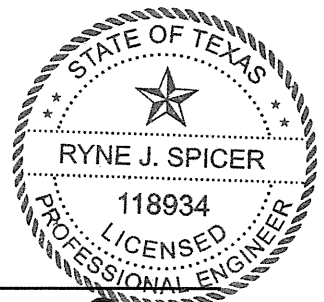


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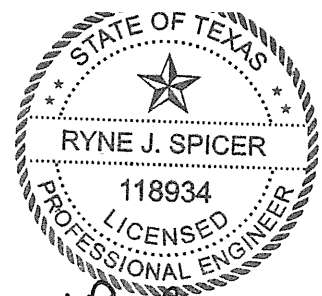
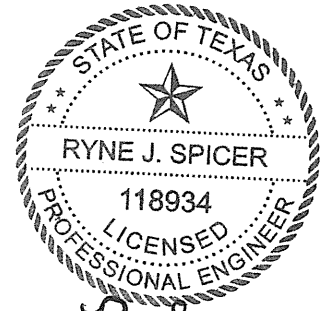


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3.2 Access

1. Public Roads – The public site access roads within one mile of the facility include Old Ballinger Highway (two-lane, asphalt-paved), Covington Road (two-lane, asphalt-paved), South 50th Street (two-lane, asphalt-paved), North U.S. Highway 277 (four lane, asphalt-paved highway), and North U.S. Highway 67 (four lane, asphalt-paved expressway). The site entrance to the landfill is located on Old Ballinger Highway.

The San Angelo Landfill is bound to the south by Old Ballinger Highway, to the east by Covington Road, and to the north by S. 50th Street. N. U.S. Highway 277 intersects with Old Ballinger Highway approximately one mile east of the permit boundary. In general, the majority of landfill vehicles originating from the east, south, or west will utilize N. U.S. Highway 67 to access the facility.

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2. Wet Weather Access — As noted in Section 1, a paved entrance will provide wet weather access to the site from Old Ballinger Highway. Internal, all-weather roads will provide access to the designated disposal areas.

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TOM GREEN COUNTY, TEXAS
TCEQ PERMIT NO. MSW 79
PERMIT MODIFICATION
PART IV – SITE OPERATING PLAN**

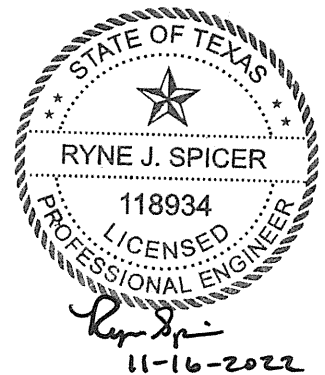
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And

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July 1994
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Revised November 2006
Revised May 2017

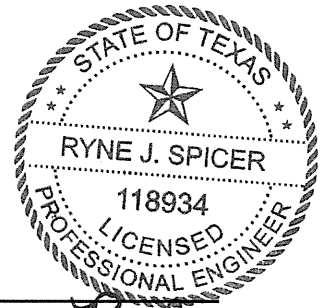
Revised ~~September~~ November 2022



Prepared by

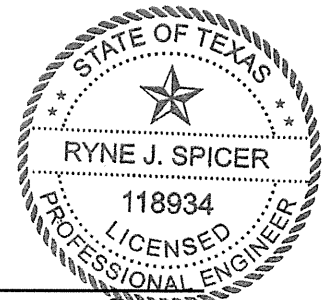
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6420 Southwest Boulevard, Suite 206
Fort Worth, Texas 76109
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WCG Project No. 0120-686-11-14



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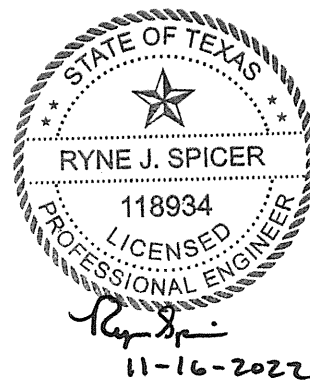
Liquid Stabilization Plan

APPENDIX IVD

Alternative Daily Cover Operating Plan

APPENDIX IVE

Waste Acceptance Plan



3 PERSONNEL AND TRAINING (30 TAC §330.127(1), (3), & (4))

3.1 Personnel (§330.127(1))

The San Angelo Landfill will be staffed with qualified individuals experienced with municipal solid waste disposal operations and earthmoving construction projects. The City of San Angelo has contracted with ~~Trashaway Waste Services, Inc.~~ Republic Waste Services of Texas, Ltd. for the day-to-day operations of the San Angelo Landfill. ~~Trashaway Waste Services, Inc.~~ Republic Waste Services of Texas, Ltd. employs the landfill manager to oversee daily operations and management of other employees. See Figure 3.1 - Organizational Chart for the personnel organization. Refer to Table 3-1 for a summary of job descriptions, minimum qualifications, and required training for landfill personnel. The number of landfill personnel required for the day-to-day operations of the landfill will be determined by the landfill manager, based on the waste acceptance rate.

The Public Works Director for the City of San Angelo (individual having managerial oversight of the facility) is responsible for overall facility management and is designated as the contact person for regulatory compliance matters.

The landfill manager is responsible for assuring that adequate personnel and equipment are available to provide facility operation in accordance with the Site Development Plan (SDP), Site Operating Plan (SOP), and the TCEQ regulations. The landfill manager is responsible for daily operations, administers the facility's SOP and will also serve as the emergency coordinator. The landfill manager will be on site at least 75 percent of the time. The landfill manager, at a minimum will have a high school diploma or equivalent, experience in earthmoving operations, and experience in municipal solid waste disposal operations. The landfill manager will obtain and maintain a Class A license as a municipal solid waste operator consistent with the requirements of §§30.201, 30.207, 30.210, and 30.212.

The gate attendant(s) stationed at the site entrance is primarily responsible for maintaining complete and accurate records of vehicles and solid waste entering the facility. The gate attendant will be trained in site safety procedures, to weigh vehicles, measure waste volumes if necessary, and to collect waste disposal fees. The gate attendant will be present all hours the San Angelo Landfill is open to the public. The gate attendant will report to the landfill manager. The gate attendant, at a minimum, will have a basic understanding of accounting principles, and basic communication skills.

Equipment operator(s) are responsible for the safe operation of the equipment. As the personnel most closely involved with the actual landfill operation, these employees are responsible for being alert for potentially dangerous conditions, or careless and improper actions on the part of non-employees and other persons while on the premises. Equipment operators monitor and direct unloading vehicles, perform random load inspections, visually check for unauthorized wastes, and are also responsible for maintenance, construction, litter abatement, and general site cleanup. The equipment

operators will intervene as necessary to prevent accidents and report unsafe conditions immediately to the landfill manager. Equipment operators report to the landfill manager. Equipment operators, at a minimum, must be experienced in the operation of heavy equipment, experienced in earthmoving operations, and demonstrate the ability to be trained in municipal solid waste disposal operations. Equipment operators will have a minimum of six months experience in heavy equipment operation or on-the-job training by the landfill manager and training by the landfill manager in SOP requirements for daily cover and unauthorized waste.

Other site personnel or laborer(s) may be employed from time to time in categories such as maintenance, construction, litter abatement, and general site cleanup. Site personnel may be permanent or part-time.

3.2 General Instructions (§330.127(3))

The San Angelo Landfill personnel should have a basic understanding of the contents of this SOP. The landfill manager should have a basic knowledge of the approved Site Development Plan. The San Angelo Landfill personnel will follow the general instructions provided in the Site Operating Plan and Site Development Plan. Refer to Section 8.24 - Site Inspection and Maintenance Schedule for a listing of operational tasks required.

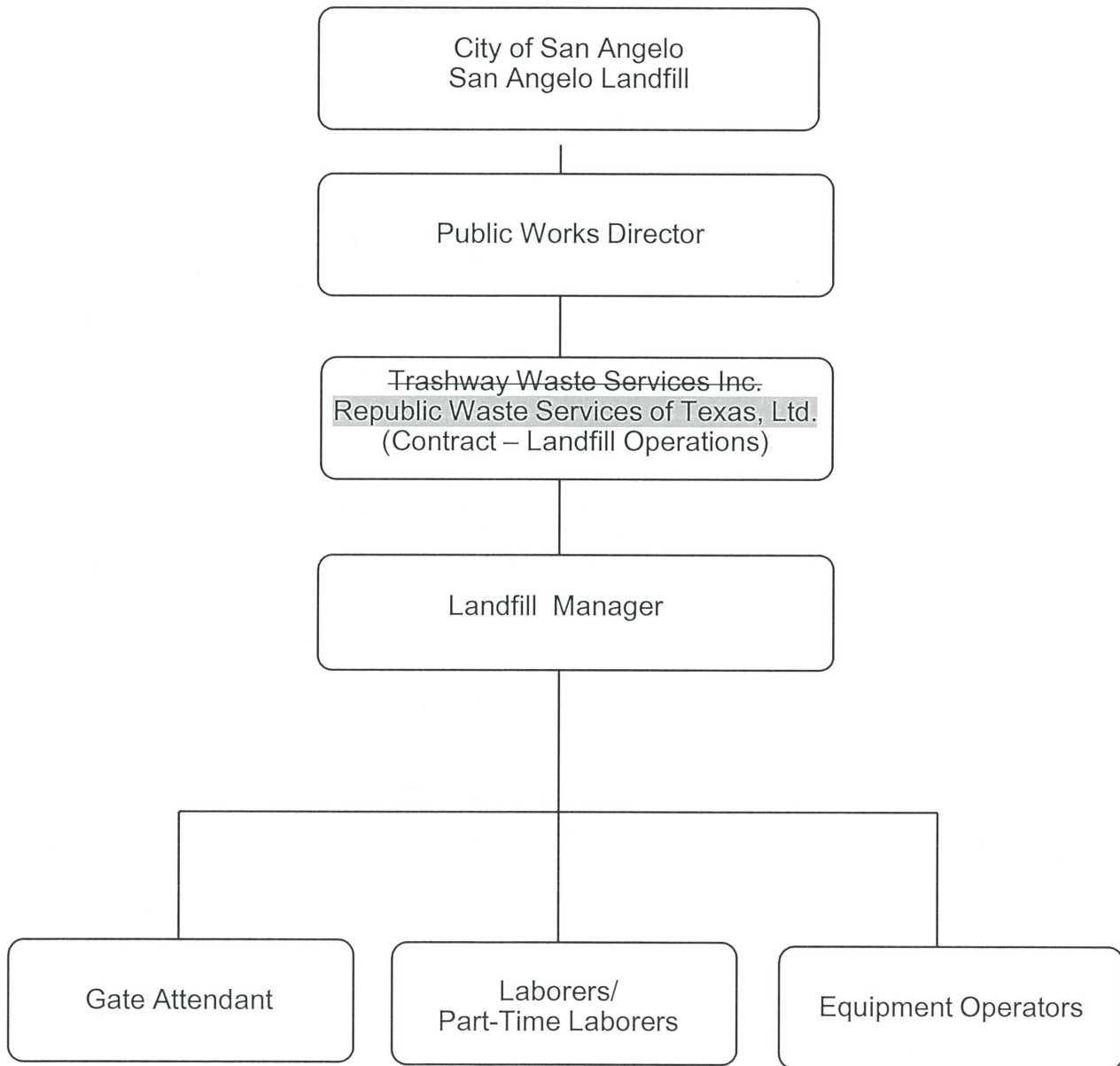
3.3 Training (§330.127(4))

The San Angelo Landfill personnel will be trained consistent with the applicable training requirements as defined in §335.586(a) and (c). Training requirements are also included in Table 3-1 -Site Personnel Summary.

The San Angelo Landfill personnel will receive training through a combination of classroom instruction and on-the-job training. The training program will provide instruction to personnel to allow performance of their duties to ensure facility compliance. This training program will be directed by a senior staff member of the San Angelo Landfill organization. Training will be conducted by the San Angelo Landfill staff, ~~Trashaway Waste Services, Inc.~~ Republic Waste Services of Texas, Ltd. staff or consultants that are experienced and trained in municipal solid waste management procedures. The facility personnel will be trained in procedures relevant to the position for which they are employed. In-house training will address the following topics:

- Municipal Solid Waste Permit No. 79A
- Site Development Plan (applicable sections)
- Site Operating Plan
- Facility emergency monitoring equipment and plans
- Communication and alarm systems
- Customer notification and load inspection procedures
- Identification of prohibited wastes including hazardous wastes and PCB wastes
- Waste handling procedures (acceptable and prohibited wastes)
- Health and safety
- Fire Protection Plan
- Equipment operation and maintenance

**Figure 3.1
Organizational Chart**



8 OPERATIONAL PROCEDURES (30 TAC §330.127(3))

8.1 Access Control (§330.131)

Public access to the landfill will be controlled by an existing perimeter fence located along the permit and property boundary. The gatehouse, scales, and site entrance road are located outside of the permit boundary. These facilities are located on property owned by ~~Trashaway Waste Services, Inc.~~ Republic Waste Services of Texas, Ltd. (the operator of the San Angelo Landfill). This property is fenced as though it is part of the permit boundary. Public access to the landfill from Old Ballinger Highway is limited to the gated site entrance road through the gatehouse area located along the southern boundary. The gate attendant controls access and monitors all vehicles entering and exiting the site. There are ~~three~~ two service entries located at the ~~southwest~~, southeast, and northeast corners of the site that are used for construction vehicles (authorized contractors or site personnel).

8.1.1 Site Security

Site security measures are designed to prevent unauthorized persons from entering the site, to protect the facility and its equipment from possible damage caused by trespassers, and to prevent disruption of facility operations caused by unauthorized site entry.

Unauthorized entry into the site is minimized by controlling access to the landfill site with the perimeter fence and gate at the entrance. A perimeter fence is located along the permit and property boundary on the north, east, west, and south sides of the site. Perimeter fencing consisting of barbed wire, woven wire, wooden fencing, plastic fencing, pipe fencing, or other suitable material will be provided. A gate constructed of suitable fencing materials is located on the entrance road. The gate will be locked when the landfill is not accepting waste from public haulers.

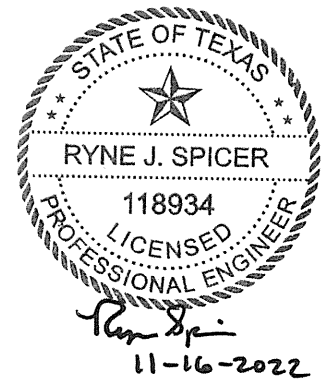
The two service entries located at the southeast and northeast corners of the site are gated. These entries will be locked at all times when authorized personnel are not using them.

~~The southwest service entry provides access between the adjacent property owner and the landfill. This gate is used by the neighboring meat packing plant to transport dead animals and slaughterhouse waste to the landfill without accessing public roads. Waste that enters through this gate proceeds to the gatehouse prior to disposal at the landfill. This gate will be locked at all times when authorized persons are not using it.~~

Entrance to the landfill is monitored by the gate attendant during site operating hours at the gatehouse. Outside operating hours, the gate to the site will be locked.

ATTACHMENT 2
REPLACEMENT PAGES
(CLEAN VERSION)

**SAN ANGELO LANDFILL
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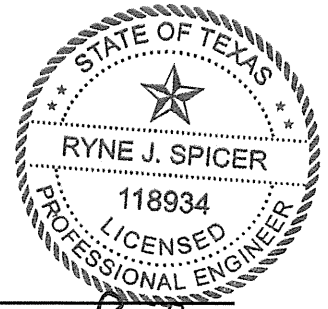


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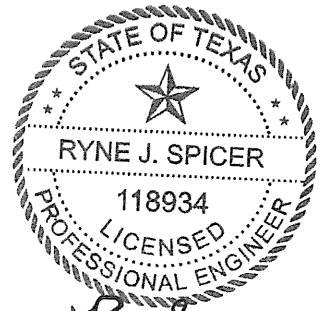
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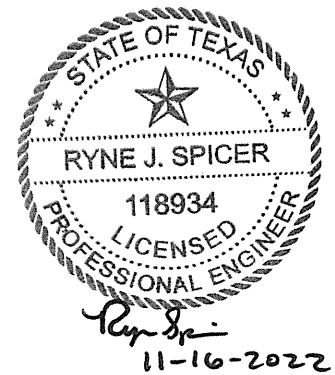
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Revised May 2017

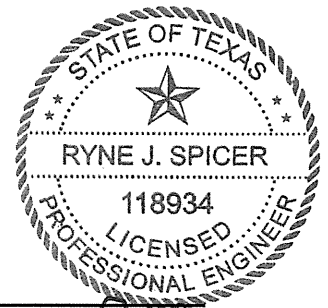
Revised November 2022



Prepared by

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WCG Project No. 0120-686-11-14



Ryne Spicer 11-16-2027

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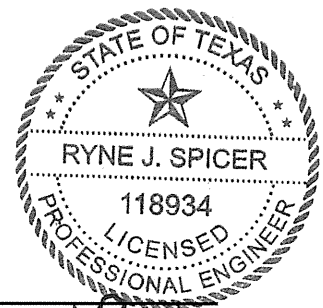
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Load Inspection Report

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Waste Acceptance Plan



3 PERSONNEL AND TRAINING (30 TAC §330.127(1), (3), & (4))

3.1 Personnel (§330.127(1))

The San Angelo Landfill will be staffed with qualified individuals experienced with municipal solid waste disposal operations and earthmoving construction projects. The City of San Angelo has contracted with Republic Waste Services of Texas, Ltd. for the day-to-day operations of the San Angelo Landfill. Republic Waste Services of Texas, Ltd. employs the landfill manager to oversee daily operations and management of other employees. See Figure 3.1 - Organizational Chart for the personnel organization. Refer to Table 3-1 for a summary of job descriptions, minimum qualifications, and required training for landfill personnel. The number of landfill personnel required for the day-to-day operations of the landfill will be determined by the landfill manager, based on the waste acceptance rate.

The Public Works Director for the City of San Angelo (individual having managerial oversight of the facility) is responsible for overall facility management and is designated as the contact person for regulatory compliance matters.

The landfill manager is responsible for assuring that adequate personnel and equipment are available to provide facility operation in accordance with the Site Development Plan (SDP), Site Operating Plan (SOP), and the TCEQ regulations. The landfill manager is responsible for daily operations, administers the facility's SOP and will also serve as the emergency coordinator. The landfill manager will be on site at least 75 percent of the time. The landfill manager, at a minimum will have a high school diploma or equivalent, experience in earthmoving operations, and experience in municipal solid waste disposal operations. The landfill manager will obtain and maintain a Class A license as a municipal solid waste operator consistent with the requirements of §§30.201, 30.207, 30.210, and 30.212.

The gate attendant(s) stationed at the site entrance is primarily responsible for maintaining complete and accurate records of vehicles and solid waste entering the facility. The gate attendant will be trained in site safety procedures, to weigh vehicles, measure waste volumes if necessary, and to collect waste disposal fees. The gate attendant will be present all hours the San Angelo Landfill is open to the public. The gate attendant will report to the landfill manager. The gate attendant, at a minimum, will have a basic understanding of accounting principles, and basic communication skills.

Equipment operator(s) are responsible for the safe operation of the equipment. As the personnel most closely involved with the actual landfill operation, these employees are responsible for being alert for potentially dangerous conditions, or careless and improper actions on the part of non-employees and other persons while on the premises. Equipment operators monitor and direct unloading vehicles, perform random load inspections, visually check for unauthorized wastes, and are also responsible for maintenance, construction, litter abatement, and general site cleanup. The equipment

operators will intervene as necessary to prevent accidents and report unsafe conditions immediately to the landfill manager. Equipment operators report to the landfill manager. Equipment operators, at a minimum, must be experienced in the operation of heavy equipment, experienced in earthmoving operations, and demonstrate the ability to be trained in municipal solid waste disposal operations. Equipment operators will have a minimum of six months experience in heavy equipment operation or on-the-job training by the landfill manager and training by the landfill manager in SOP requirements for daily cover and unauthorized waste.

Other site personnel or laborer(s) may be employed from time to time in categories such as maintenance, construction, litter abatement, and general site cleanup. Site personnel may be permanent or part-time.

3.2 General Instructions (§330.127(3))

The San Angelo Landfill personnel should have a basic understanding of the contents of this SOP. The landfill manager should have a basic knowledge of the approved Site Development Plan. The San Angelo Landfill personnel will follow the general instructions provided in the Site Operating Plan and Site Development Plan. Refer to Section 8.24 - Site Inspection and Maintenance Schedule for a listing of operational tasks required.

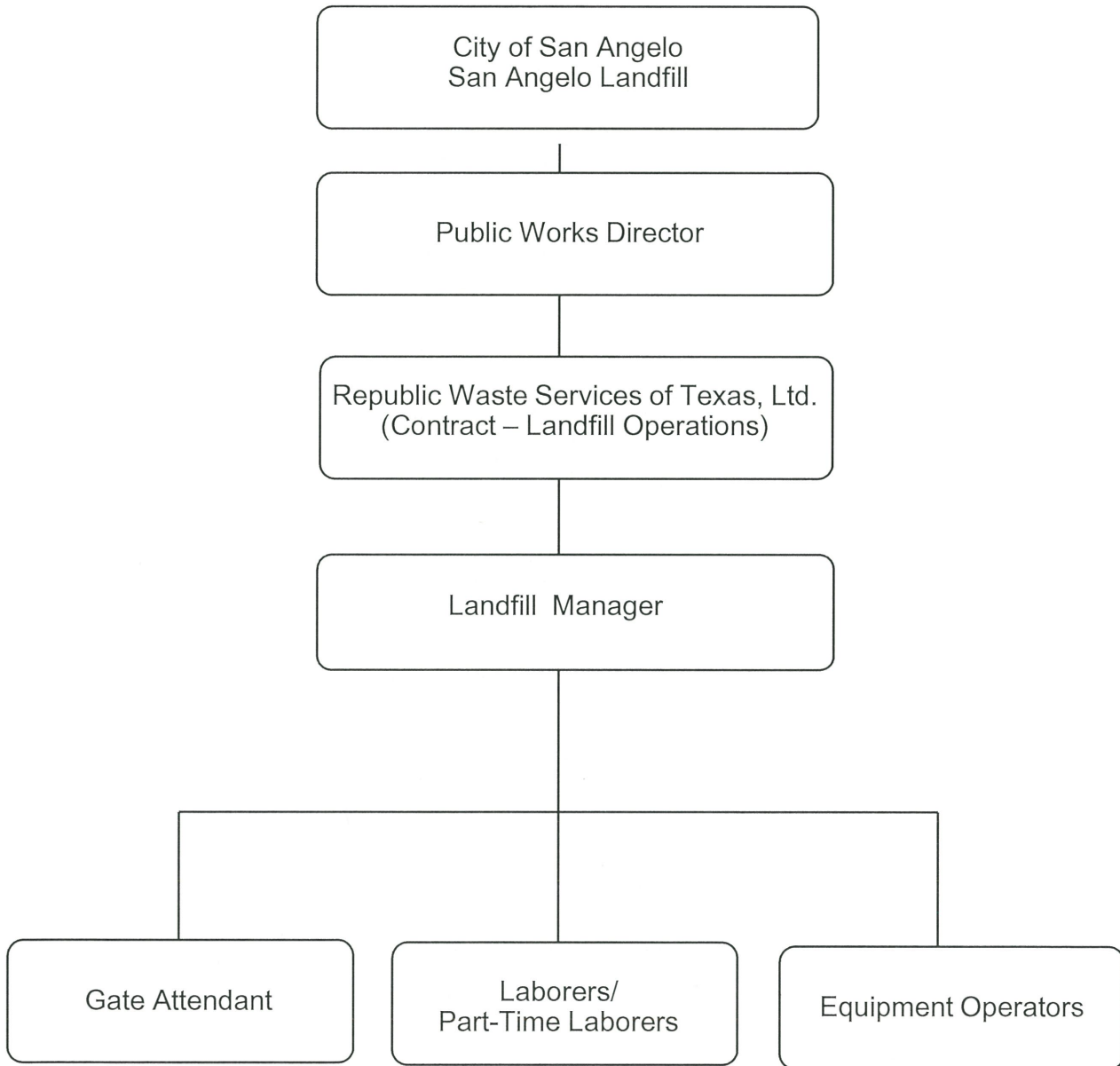
3.3 Training (§330.127(4))

The San Angelo Landfill personnel will be trained consistent with the applicable training requirements as defined in §335.586(a) and (c). Training requirements are also included in Table 3-1 -Site Personnel Summary.

The San Angelo Landfill personnel will receive training through a combination of classroom instruction and on-the-job training. The training program will provide instruction to personnel to allow performance of their duties to ensure facility compliance. This training program will be directed by a senior staff member of the San Angelo Landfill organization. Training will be conducted by the San Angelo Landfill staff, Republic Waste Services of Texas, Ltd. staff or consultants that are experienced and trained in municipal solid waste management procedures. The facility personnel will be trained in procedures relevant to the position for which they are employed. In-house training will address the following topics:

- Municipal Solid Waste Permit No. 79
- Site Development Plan (applicable sections)
- Site Operating Plan
- Facility emergency monitoring equipment and plans
- Communication and alarm systems
- Customer notification and load inspection procedures
- Identification of prohibited wastes including hazardous wastes and PCB wastes
- Waste handling procedures (acceptable and prohibited wastes)
- Health and safety
- Fire Protection Plan
- Equipment operation and maintenance

**Figure 3.1
Organizational Chart**



8 OPERATIONAL PROCEDURES (30 TAC §330.127(3))

8.1 Access Control (§330.131)

Public access to the landfill will be controlled by an existing perimeter fence located along the permit and property boundary. The gatehouse, scales, and site entrance road are located outside of the permit boundary. These facilities are located on property owned by Republic Waste Services of Texas, Ltd. (the operator of the San Angelo Landfill). This property is fenced as though it is part of the permit boundary. Public access to the landfill from Old Ballinger Highway is limited to the gated site entrance road through the gatehouse area located along the southern boundary. The gate attendant controls access and monitors all vehicles entering and exiting the site. There are two service entries located at the southeast and northeast corners of the site that are used for construction vehicles (authorized contractors or site personnel).

8.1.1 Site Security

Site security measures are designed to prevent unauthorized persons from entering the site, to protect the facility and its equipment from possible damage caused by trespassers, and to prevent disruption of facility operations caused by unauthorized site entry.

Unauthorized entry into the site is minimized by controlling access to the landfill site with the perimeter fence and gate at the entrance. A perimeter fence is located along the permit and property boundary on the north, east, west, and south sides of the site. Perimeter fencing consisting of barbed wire, woven wire, wooden fencing, plastic fencing, pipe fencing, or other suitable material will be provided. A gate constructed of suitable fencing materials is located on the entrance road. The gate will be locked when the landfill is not accepting waste from public haulers.

The two service entries located at the southeast and northeast corners of the site are gated. These entries will be locked at all times when authorized personnel are not using them.

Entrance to the landfill is monitored by the gate attendant during site operating hours at the gatehouse. Outside operating hours, the gate to the site will be locked.

ATTACHMENT 3
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: San Angelo Landfill
Permittee or Registrant Name: City of San Angelo
MSW Authorization Number: 79
Initial Submission Date: 09/2022
Revision Date: 12/2022

Instructions for completing this form are provided in [form TCEQ-20650-instr](#)¹. If you have questions, contact the Municipal Solid Waste Permits Section by email to mswper@tceq.texas.gov, or by phone at 512-239-2335.

Application Data

1. Submission Type

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: 582EA000504764

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

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: Shane Kelton Title: Director of Operations

Email Address: shane.kelton@cosatx.us

Signature: [Handwritten Signature] Date: 12-2-22

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 Ann M. Pierce

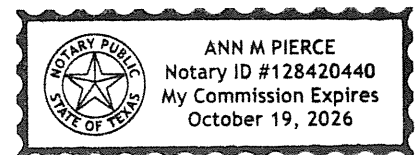
On this 2nd day of December, 2022

My commission expires on the 19th day of October, 2026

Ann M. Pierce

Notary Public in and for

Tom Green County, Texas



Note: Application Must Bear Signature and Seal of Notary Public