



Texas Commission on Environmental Quality Waste Permits Division Correspondence Cover Sheet

Date: 11/15/2022

Facility Name: Lacy Lakeview Recycling and Disposal Facility

Permit or Registration No.: MSW-1646B

Nature of Correspondence:

Initial/New

Response/Revision to TCEQ Tracking No.: 27941547 (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
<input type="checkbox"/> New Notice of Intent	<input type="checkbox"/> Alternative Daily Cover Report
<input type="checkbox"/> Notice of Intent Revision	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Compost Report
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input checked="" type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Groundwater Background Evaluation
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure	<input type="checkbox"/> Other:
<input type="checkbox"/> Other:	

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> CCR Registration	<input type="checkbox"/> Extension Request
<input type="checkbox"/> CCR Registration Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> CCR Registration Minor Amendment	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Waste Minimization Report
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> 335.6 Notification	
<input type="checkbox"/> Other:	

15 November 2022

Digital copy submitted via email to: guanhua.gai@tceq.texas.gov

Hardcopy via Fedex to:

Guanhua Gai, Bldg. F
Texas Commission on Environmental Quality (TCEQ)
Business & Program Services Section, Waste Permits Division
12100 Park 35 Circle
Austin, Texas 78753

**Subject: Response to Administrative Notice of Deficiency
Permit Amendment Application, Proposed MSW Permit No. 1646B
Lacy Lakeview Recycling and Disposal Facility
Waco, McLennan County, Texas
Tracking No. 27941547**

Dear Ms. Gai:

On behalf of the City of Lacy Lakeview and Waste Management of Texas, Inc. (WMTX), Geosyntec Consultants (Geosyntec) has prepared this letter in response to the administrative notice of deficiency (NOD) comments on the above-referenced permit amendment application transmitted in a 7 November 2022 letter from the Texas Commission on Environmental Quality (TCEQ) to the City of Lacy Lakeview.

RESPONSE TO COMMENTS

TCEQ's administrative review comments are presented on the attached table for "Administrative NOD #1", with the Applicant's responses included in the last column of the table.

APPLICATION REVISIONS UPDATED SIGNATURE PAGE

As a result of the revisions, replacement pages to the permit amendment application are enclosed with this letter to replace the previously submitted versions of the applicable pages. These revisions have an updated date reflecting when the revision was made. Note that the changes are only to the TCEQ Part I Application Form, which is not formatted in a manner that conveniently allows for enabling a redline/strikeout (i.e., "marked") version. The attached table clearly explains what changes have been made. An updated Part I Application Form cover page and signature page (Pages 1 and 11 of the Form) accompany this submittal. Page 11 of the Part I Form includes the applicant's signed and notarized certification statement for this submittal.

CLOSING

One original and three (3) copies of this submittal are being provided to the TCEQ Waste Permits Division, Business & Program Services Section in Austin. An electronic copy of this submittal has also been posted to the internet at the same URL as the initial posting of the application. Geosyntec trusts that the above

Ms. Guanhua Gai
15 November 2022
Page 2

responses to TCEQ's comments provide the necessary information requested by TCEQ to complete their administrative review of the permit amendment application. If you have any questions regarding the information presented in this letter, please do not hesitate to contact me at (512) 354-3279, or by E-mail at sgraves@geosyntec.com.

Sincerely

A handwritten signature in blue ink, appearing to read 'S. Graves', is written over the word 'Sincerely'.

Scott M. Graves, P.E.
Senior Principal
Geosyntec Consultants, Inc.

Copy to: Mr. Keith Bond, City of Lacy Lakeview
Mr. James Smith, WMTX
Ms. Falen Bohannon, Heart of Texas Council of Governments (HOTCOG)

Application Deficiencies – Administrative NOD #1

ID ¹	App. Part	App. Section	Location ²	Citation	Error Type ³	Deficiency Description/Resolution	Applicant Response
A1					Omitted	Please submit an electronic copy of the completed Excel MSW Application Checklist for this permit amendment. The template can be downloaded at the following link: https://www.tceq.texas.gov/assets/public/permitting/waste/msw/MSW-Checklist.xlsm .	An electronic copy of the completed Excel MSW Application Checklist was submitted via the TCEQ Secure FTP Site on 10/28/2022, along with a digital copy of the entire permit amendment application. We have checked and verified that this Excel file is still posted at the shared folder on the TCEQ FTP site. To ensure it is received properly, we are also transmitting an electronic copy via email to guanhua.gai@tceq.texas.gov concurrently with this NOD response submittal.
A2	I	Page 2	Section 5		Incomplete	Please post the application and all revisions to the provided URL address.	As requested, the application and revisions have been posted to the internet at the URL indicated on the application form.
A3	I	Page 4	Section 12		Incorrect	Please revise the MSW Authorization Number to 1646B.	We were unclear whether this Form entry was referring to the existing authorization number or the proposed authorization number. Per this request, we have changed Item 12 on Page 4 of the Part I Form to list the proposed permit number 1646B.
A4	I	Page 8	Section 20		Incorrect	Please verify and revise TXDOT Thomas Willis email address to Thomas.Willis@txdot.gov .	This entry in Item 20 on Page 8 of the Part I Form has been checked and revised as requested.
A5	I	Page 8	Section 20		Incorrect	Please verify and revise County Judge, the Honorable Scott Felton's contact information as follows: 501 Washington Ave, Room 214 Waco, TX 76701 Phone Number: (254) 757-5049	This entry in Item 20 on Page 8 of the Part I Form has been revised as requested.
A6	I	Page 9	Section 20		Incorrect	Please verify and revise Council of Governments (COG) COG Representative's Name to Mr. Russell Devorsky, Executive Director , and his email address to Russell.Devorsky@hotmail.com .	From previous permit amendment applications, it was our understanding that the COG representative listed on the form should (or could) be the Chairperson of the Solid Waste Advisory Committee. Instead, we have changed Item 20 on Page 9 of the Part I Form to list the contact person and information requested.
A7	I	Attachments	Core Data Forms		Omitted	Please complete Section II: Customer Information for the provided two Core Data Forms.	Section II of the Core Data Forms was left blank because none of the customer information is changing for either customer. Per the TCEQ Instructions for this form, none of the boxes of Section II, Item 4 are applicable (therefore, none were checked). As such, there is no changed information to be provided in the remainder of Section II.
A8	I			305.45(a)(6)(A-D)	Omitted	Please submit an electronic word version of the mailing labels for the adjacent landowners list. Names and addresses must be typed in the format required by the U.S. Postal Service for machine readability. The list is to be 30 names, addresses, etc. (10 per column) per page (MS WORD Avery Standard 5160).	An electronic copy (Word file) of the mailing labels was submitted via the TCEQ Secure FTP Site on 10/28/2022, along with a digital copy of the entire permit amendment application. We have checked and verified that this Word file is still posted at the shared folder on the TCEQ FTP site. To ensure it is received properly, we are also transmitting an electronic copy via email to guanhua.gai@tceq.texas.gov concurrently with this NOD response submittal.
A9	I		Signature	305.44, 270.11	Incomplete	Please resubmit an original signed, sealed and notarized signature page.	This submittal includes a completed Signature Page to accompany these revisions, as requested.

¹Deficiency ID – Key: A#=Administrative deficiency (ex. A12); T#=Technical deficiency (ex. T10); C#=Comment only (ex. C1); Number in parenthesis (n) = nth instance of same deficiency (ex. T1(2) is the second instance of deficiency T1 originally identified in previous NOD).

²Location of deficiency in submittal/application. Items in square brackets [] refer to applicant's supplemental information submitted as attachments to the application form.

³Possible Error Types, one of: Ambiguous, Incomplete, Inconsistent, Incorrect, Omitted, Typo, or Wrong Format.

CLEAN REPLACEMENT PAGES

The items that follow are provided as replacement pages to completely replace the previous versions of those pages.

- Part I Application Form: Pages 1, 4, 8, 9, and 11.



Texas Commission on Environmental Quality

Part I Application Form for New Permit, Permit Amendment, or Registration for a Municipal Solid Waste Facility

Application Tracking Information

Facility Name: Lacy Lakeview Recycling and Disposal Facility

Permittee or Registrant Name: City of Lacy Lakeview

MSW Authorization Number: 1646B

Initial Submission Date: 10/28/2022

Revision Date: 11/10/2022

Instructions for completing this Part I Application Form are provided in [TCEQ 00650-instr](#)¹. Include a [Core Data Form \(TCEQ 10400\)](#)² with the application for the facility owner, and another Core Data Form for the operator if different from the owner. 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

New Permit
 Permit Major Amendment Permit Limited Scope Major Amendment
 New Registration

¹ www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/00650-instr.pdf

² www.tceq.texas.gov/goto/coredata

Permit or Approval	Received	Pending	Not Applicable
Ocean Dumping Permits under Marine Protection Research and Sanctuaries Act			X
Dredge or Fill Permits under Clean Water Act			X
Licenses under the Texas Radiation Control Act			X
Other (describe): See Part I/II Report, Section 4.1	X		
Other (describe):			

12. Facility General Information

Facility Name: Lacy Lakeview Recycling and Disposal Facility

Contact Name: James Smith Title: WMTX, Area Manager of Disposal Operations

MSW Authorization Number (if existing): 1646B

Regulated Entity Reference Number: **RN** 100218536

Physical or Street Address (if available): 677 Selby Ln

City: Waco County: McLennan State: TX Zip Code: 76705

Phone Number: (254) 799-9353

Latitude (Degrees, Minutes Seconds): N 31° 36' 19.13"

Longitude (Degrees, Minutes Seconds): W 97° 3' 29.95"

Benchmark Elevation (above mean sea level): 431.12 feet

Description of facility location with respect to known or easily identifiable landmarks:

Approx. 2.7 mi. east of Interstate Highway (IH)-35 and TX-340 Loop/N Loop 340, just southeast of the City of Bellmead.

Access routes from the nearest United States or state highway to the facility:

US 84 to Selby Ln, go south on Selby Ln for 0.6 miles, driveway entrance on east side of Selby Ln.

Coastal Management Program

Is the facility within the Coastal Management Program boundary?

Yes No

Local Government Authority Responsible for Road Maintenance (if applicable)

Government or Agency Name: TxDOT
Contact Person's Name: Thomas Willis, Maintenance Supervisor
Mailing Address: 7479 Bagby Ave
City: Waco County: McLennan State: TX Zip Code: 76712
Phone Number: (254) 772-1200
Email Address: Thomas.Willis@txdot.gov

City Mayor Information

City Mayor's Name: Dillon Meek
Mailing Address: 300 Austin Ave
City: Waco County: McLennan State: TX Zip Code: 76702
Phone Number: (254) 299-2489
Email Address: Dillon.Meek@wacotx.gov

City Health Authority

Authority Name: Waco-McLennan Health District
Contact Person's Name: LaShonda Malrey-Horne
Mailing Address: 225 W Waco Dr
City: Waco County: McLennan State: TX Zip Code: 76707
Phone Number: (254) 750-5450
Email Address: lashondam@wacotx.gov

County Judge Information

County Judge's Name: Scott Felton
Mailing Address: 501 Washington Ave, Room 214
City: Waco County: McLennan State: TX Zip Code: 76701
Phone Number: (254) 757-5049
Email Address: to administrative specialist: regan.copeland@co.mclennan.tx.us

County Health Authority

Agency Name: Waco-McLennan Health District
Contact Person's Name: LaShonda Malrey-Horne
Mailing Address: 225 W Waco Dr
City: Waco County: McLennan State: TX Zip Code: 76707
Phone Number: (254) 750-5450
Email Address: lashondam@wacotx.gov

State Representative Information

District Number: 12
State Representative's Name: Kyle Kacal
District Office Mailing Address: 3000 Briarcrest Dr, Suite 203
City: Bryan County: Brazos State: TX Zip Code: 77802
Phone Number: (979) 774-7276
Email Address: Kyle.Kacal@house.texas.gov

State Senator Information

District Number: 22
State Senator's Name: Brian Birdwell
District Office Mailing Address: 900 Austin Ave, Suite 500
City: Waco County: McLennan State: TX Zip Code: 76701
Phone Number: (254) 772-6225
Email Address: brian.birdwell@senate.texas.gov

Council of Governments (COG)

COG Name: Heart of Texas Council of Governments (HOTCOG)
COG Representative's Name: Russell Devorsky
COG Representative's Title: Executive Director
Mailing Address: 1514 S New Road
City: Waco County: McLennan State: TX Zip Code: 76711
Phone Number: (254) 292-1800
Email Address: Russell.Devorsky@hot.cog.tx.us

River Basin Authority

Authority Name: Brazos River Authority
Contact Person's Name: David Collinsworth, General Manager
Watershed Sub-Basin Name: Middle Brazos
Mailing Address: 4600 Cobbs Dr
City: Waco County: McLennan State: TX Zip Code: 76710
Phone Number: (254) 761-3100
Email Address: davidc@brazos.org

U.S. Army Corps of Engineers District

Indicate the U.S. Army Corps of Engineers district in which the facility is located:

- Albuquerque, NM Galveston, TX
 Ft. Worth, TX Tulsa, OK

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: Keith Bond Title: City Manager

Email Address: keith.bond@lacylakeview.org

Signature: [Handwritten Signature] Date: 11-10-2022

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: Keith Bond

Email Address: Keith.bond@lacylakeview.org

Signature: [Handwritten Signature] Date: 11-10-2022

Notary

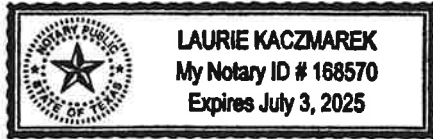
SUBSCRIBED AND SWORN to before me by the said Keith Bond

On this 10th day of November, 2022

My commission expires on the 3rd day of July, 2025

Laurie Kaczmarek

Notary Public in and for
McClennan County, Texas



Note: Application Must Bear Signature & Seal of Notary Public