

RESPONSE 25

The area outside the waste disposal footprint is used for buffer and landfill facilities, including the gatehouse and scales, landfill access road, leachate storage ponds, leachate force main, and landfill gas flare. As part of the MSW Permit 692A overall development, two detention ponds have been constructed. All surface water from the disposal area is routed through a pond prior to exiting the site.

The proposed expansion area is immediately adjacent to and east of the existing MSW 692A permit boundary owned by the City of Temple. The proposed expansion will add 191 acres and remove 17 acres from the existing permit boundary, resulting in a total proposed MSW 692B permit boundary of 443 acres.

The expansion area, purchased by the City of Temple, consists of agricultural land with single-family homes. The surface topography generally slopes radially from the center of the expansion area. There are several easements located on the existing permit boundary and the proposed expansion area. One easement will be moved. The easements will not affect landfill operations.

1.1 Easements and Buffer Zones

No solid waste unloading, storage, disposal, or processing operations will occur within any easement, buffer zone, or right-of-way that crosses the site. The existing Temple Recycling and Disposal Facility and proposed expansion is consistent with the provisions of 30 TAC §330.543.

No solid waste disposal shall occur within the easement or within 25 feet of the center line of any utility line or pipeline easement, whichever is greater, unless otherwise authorized by the executive director. All pipeline and utility easements shall be clearly marked with posts that extend at least 6 feet above ground level, spaced at intervals no greater than 300 feet. ~~One power line easement crosses the proposed expansion area; this easement will be relocated. The remaining easements will not affect solid waste unloading, storage, disposal, or processing operations;~~

Site easements are shown on Figure II-4, Site Layout Plan. Easements that are shown within the waste footprint of MSW-692A are in the process of being abandoned by the City of Temple. Documentation is provided in Appendix IG. Existing easements within the expansion area will be abandoned prior to cell construction in the area. The area outside the permit boundary is owned by the City of Temple, thus access is available for a width greater than 50 feet from the Citizens Collection Station. The City of Temple is thereby requesting a variance from the buffer zone requirements of 30 TAC §330.543(b).

The buffer zone distances between the permit boundary and waste disposal area are identified on Figure II-4, Site Layout Plan. There is no proposed increase in the waste disposal footprint in the existing waste disposal area, as such, the existing buffer zone distances comply with the requirements of 30 TAC §330.543(b). Buffer zones will remain in a natural condition. Any litter in the buffer zone will

be collected as part of routine on-site liter collection, as identified in the Site Operating Plan. The buffer zone distances for the expansion area exceed the minimum buffer zone distance of 125 feet, as shown on Figure II-4, Site Layout Plan.

The buffer zone distances between the permit boundary and storage and processing facilities are identified on Figure II-4, Site Layout Plan. Existing permitted storage and processing facilities include the landfill gas flare facility and leachate storage facility, shown on Figure II-4, Site Layout Plan, and meet the requirements of 30 TAC §330.543(b).

The Citizen Collection Station was constructed in 2005 and has been in operation for over 10 years. Along the western boundary of the Citizen Collection Station, the buffer zone distance is less than 50 feet; however, adequate space for access is provided along the northern, eastern, and southern sides of the Citizen Collection Station. The area outside the permit boundary is owned by the City of Temple, thus access is available for a width greater than 50 feet from the Citizen Collection Station citizens collection station. The City of Temple is hereby requesting a variance from the buffer zone requirements of 30 TAC §330.543(b).

A design drawing of the Citizen Collection Station is included in Appendix IIIH.

1.2 Site-Specific Conditions

Sections 8 through 15 of Part II include detailed discussion of site-specific conditions that potentially require special design considerations, as set forth in 30 TAC §330.61(a), including impact on surrounding area, transportation, geology, soils, groundwater, surface water, abandoned oil and water wells, floodplains, wetlands, endangered or threatened species, and Texas Historical Commission (THC) review. As documented, there are no existing site-specific conditions that require special design considerations or possible mitigation of conditions.

There are two existing leachate storage/evaporation ponds that have been approved by TCEQ:

- Pond A: A modular steel tank constructed of a reinforced steel frame with a geomembrane liner underlain by a clay layer is currently in use. For operating purposes, this tank is called Pond A. Pond A has a capacity of 270,000 gallons, excluding freeboard, and was authorized by a permit modification approved by TCEQ in early 2002.
- Pond B: On November 17, 2004, TCEQ approved a permit modification to the facility's Leachate and Contaminated Water Plan authorizing the construction of up to two additional in-ground ponds labeled Pond A and Pond B. Only one of these in-ground ponds has been constructed to date. For operating purposes, the pond constructed is called Pond B. In accordance with 30 TAC §330.207(b), Pond B was constructed with a two foot thick clay liner overlain by 60-mil HDPE liner and one foot of freeboard for the 25-year, 24-hour rainfall event will be maintained.