

# Questions from Richardson Residents regarding the Upcoming Lookout Drive Transfer Station Remodel and Proposed Expansion September 4, 2009

## OPERATIONAL DATA & TRASH FLOW

### 1. How is data collected at the transfer stations?

*NTMWD uses scale software that records the ticket number, date, time, billing customer, material, gross weight, empty weight, and net weight. The ticket is two parts with the driver issued one part; the site keeps the other part. Data is uploaded to the NTMWD network nightly.*

### 2. Does the raw data contain only the city of origin, or is there a specific neighborhood that the trash is tied to?

*City of origin.*

### 3. What are "Outside Haulers" or "Others" from NTMWD annual reports?

*All other non-Member City haulers.*

### 4. Do they bring trash to transfer stations?

*Yes. The reports posted on the NTMWD Web site show the minor tonnage associated with these customers.*

### 5. How much does the daily average vary during the week?

*This is difficult to quantify due to so many factors that affect tonnage; e.g., rain, seasonality, holidays, shut downs at other transfer stations, etc. Monday is the heaviest day with decreasing tonnage each subsequent day of the week.*

## PERMITTED CAPACITY INCREASE

### 1. Can the permit be broken into a "standard" capacity and "special event" capacity?

*The NTMWD is reviewing the permit requirements to determine if this is a possibility.*

## FOURTH TRANSFER STATION STUDY

### 1. Why was this model (large/fewer) versus (small/distributed) chosen?

*The NTMWD developed a Regional Solid Waste Management Plan and Transfer Station Study that reviewed the existing system and needed future facilities. The study recommended an additional transfer station be constructed in the northern part of NTMWD's service area to serve future growth. NTMWD will continue to review the needs of the five Member Cities in the NTMWD's Regional Solid Waste System to determine if the current and proposed facilities are adequate to serve the Member Cities of the System. Changes will be made based on existing and projected needs, costs and discussions with the Cities regarding the overall system.*

**2. What locations have been examined?**

*The NTMWD has reviewed several potential locations for the future transfer station. However, NTMWD does not feel it is appropriate to discuss these locations at this time.*

**3. What is the main driver? (Custer taking in more than 500 tons/day on average?)**

*There are many factors in determining the need and timing for construction of a new facility for the system. These factors include: current loading at each transfer station, current loading in the entire system, rate of current growth, locations of projected growth, other programs implemented by the District or by individual Member Cities, cost of current and proposed operations, and others.*

**4. What assurances do we have that the NTMWD will make progress on building a new transfer station to handle growth of northern cities?**

*The new station that has been proposed to handle growth in the northern cities will directly affect the collection programs of the northern cities, and the overall costs their citizens pay for solid waste disposal, and will indirectly affect the overall costs of the cities that do not use the proposed station. As growth occurs in the northern cities, as haul distances to the current transfer stations increase (thereby increasing transportation costs for that city), as loading to the current facilities increase, the cost for the northern cities will increase. Should the NTMWD delay in constructing the northern transfer station, the overall costs for the northern cities may increase due to the factors mentioned above. If this delay results in operational constraints at the existing transfer stations, the overall system costs may increase, and that will affect all Member Cities. The proper timing of the construction of the future transfer station will be monitored by NTMWD, but will also be monitored by the Member Cities, whose residents ultimately pay the cost of the system. The Cities along with the NTMWD will assure that the future transfer station is constructed in a timely manner.*

**5. Has adding a 5th station been looked at?**

*See answer above.*

**6. How long would it take to build another transfer station?**

*Previously provided in July 10, 2009, answers*

**OPERATIONAL HISTORY**

**1. What is the difference between a permit modification and a permit amendment?**

*This is a legal question that is better answered by directing you to the regulations that define permit amendments and permit modifications. For permit amendments, see Texas Administrative Code (TAC) 30, Section 305.62. For modifications, see TAC 30, Section 305.70. Both are accessible through the TCEQ Web site.*

**2. Can you explain to us how an expansion in capacity can be obtained through a permit modification?**

*An increase in throughput must occur through a permit amendment and has not occurred since the site was originally permitted.*

**3. Can you explain to us what a Site Operating Plan is?**

*The application submitted to the TCEQ will consist of four parts. Part IV is the Site Operating Plan and in general provides a discussion how the facility will be operated in compliance with the regulations. The regulations for the content of Part IV of the application is found in TAC 30, Section 330.65.*

**4. What is the difference between a “permit” and a “SOP” (site operating plan)?**

*The permit is the document issued by the TCEQ that authorizes operation of the facility. The SOP is part of the application, but is considered part of the permit.*

**5. What is the proper protocol for the NTMWD to follow when changing its permit (increasing capacity) or SOP?**

*A permit amendment must be submitted to, and approved by TCEQ.*

**6. Are surrounding neighborhoods supposed to be informed of a "potential" increase in permitted capacity?**

*Per the current regulations, property owners within one-quarter mile of the permit boundary are notified.*

**7. Was there a recent change to the SOP? Permit?**

*There was a TCEQ-mandated update to the Site Operating Plan (SOP) to address recently revised regulations. No change to the actual permit occurred. The SOP was approved on May 15, 2007.*

**8. We believe that during the state-mandated call-in of all municipal solid waste SOPs, the current LOTS facility submitted an SOP that listed 1,000 tons per day as the facility's average garbage intake, even though the permit only allowed 500 tons per day. Do you agree?**

*No. The current permit still allows 500 tons average per day.*

**9. Was the correct procedure followed for the recent change in permit or SOP?**

*Yes.*

**10. Did the CoR know about the permit/SOP change before it happened?**

*No permit change occurred. The City of Richardson was aware of the Site Operating Plan permit modification.*

**11. If yes, whose responsibility is it to inform neighbors? (Procedurally)**

*The permittee (NTMWD) is required to provide the notifications in accordance with the regulations.*

**12. Is the SOP (1000 tons/day) written to mean max or average?**

*Neither. The site is allowed to accept 500 tons average per day per the permit issued by TCEQ.*

**13. Is the SOP binding? If you violate 1000 tons/day is the NTMWD in trouble?**

*The SOP is binding. NTMWD is required to accept no more than 500 tons average per day. This is averaged over 365 days.*

**14. What protocol is in place if a transfer station ever exceeds its permitted capacity? Who is notified? What is done with this information?**

*NTMWD has not exceeded the permitted throughput so we don't know how TCEQ would handle this scenario. NTMWD closely tracks tons accepted and through the scale software are informed when the throughput approaches an exceedence so trucks could be diverted to another facility.*

**15. Has Lookout ever operated past its SOP of 1000 tons/day?**

*The permit for the Lookout Drive Transfer Station, issued by the Texas Commission on Environmental Quality (TCEQ), is the governing document. The permit is for 500 tons average per day. NTMWD has never violated the TCEQ permit with respect to capacity.*

**16. In 2001 report (pg S-9) it states "The Lookout Transfer Station currently processes significantly more waste than its design capacity." What changes have been made to Lookout since that time?**

*The design capacity and permitted throughput of a transfer station can be different. The permit application submitted to the TCEQ must show that the design capacity of the station is equal to or greater than the requested permitted throughput. The NTMWD has never violated the permitted throughput of the Lookout Drive Transfer Station.*

*The NTMWD has made changes to the operation. Although each of the changes has not directly affected the station capacity, many of them have resulted in a reduction in volume or tonnage, significant operational improvements that improved waste flow in and out of the station, or overall improvements to the station operation. Some of the improvements made to the Lookout Drive Transfer Station since the 2001 report are as follows:*

- 1. The Transfer Station Study recommended that waste be shifted from the Lookout Drive Transfer Station to other NTMWD facilities. A Memorandum of Understanding was executed with the Member Cities, in which the Cities agreed to redirect waste away from the Lookout site.*
- 2. A new front loader was purchased for the site. The new equipment was specified with solid rubber tires, which has decreased the downtime of the equipment.*
- 3. The NTMWD has increased the number of front loaders in the entire transfer system. This increase in equipment allows access to additional equipment for each of the transfer stations as needed to assist in handling of the waste in the case of equipment breakdown at any one of the sites.*
- 4. The maintenance of trucks, which used to occur at this facility, has been moved to NTMWD's landfill location. This reduces traffic congestion on the site.*
- 5. Additional fueling facilities are available at NTMWD's landfill, decreasing the need for as many trucks to fuel at the Lookout site.*
- 6. A new scale has been installed, and an entire new weight recording and reporting system has been installed.*
- 7. Additional employees are stationed at the site, including a station foreman.*
- 8. The temporary labor force has been increased.*
- 9. Mowing of the site is now performed by a contractor and not by station personnel.*
- 10. The operation of City trucks has been modified slightly to decrease potential delays and decrease potential odors at the site.*
- 11. Structural improvements have been made to the building, as well as to the tipping slab inside and outside the building.*
- 12. A new Policy has been approved by the NTMWD Board of Directors regarding the use of the facility by residents of the Member Cities, which has decreased the volume and tonnage of waste deposited in the citizen drop-off pit. This has also decreased the vehicle traffic at the site. The time the front loader spends transporting waste from the pits to the transfer building has decreased, thus allowing for increased time handling of waste inside the building. One employee is permanently stationed at the citizen drop-off pit to monitor the area, sign in citizens, and maintain the area.*
- 13. Drainage improvements have been made.*
- 14. Additional security fencing has been installed.*
- 15. Odor control improvements have been made.*

16. NTMWD implemented a yard waste composting program. The drop-off location for yard waste is the Custer Road Transfer Station. This has essentially eliminated the drop-off of yard waste by City vehicles at the Lookout site. This has improved the operation in many ways:

- A. First, it had an immediate affect by reducing tonnage and truck traffic at the site.
- B. Second, it has improved the overall efficiency of the transfer station. This occurred due to the manner in which yard waste affects the loading of transfer vehicles. Brush and tree limbs are bulky, do not compact well, and take up a significant amount of space. Removing them from the waste stream has increased the overall payload in the trucks leaving the Lookout site. This results in a corresponding increase in the station efficiency, and a decrease in the number of NTMWD trucks entering and leaving the site for the same amount of waste.
- C. Third, large brush and limbs can cause mechanical problems with the compactor equipment. Bridging of tree limbs and brush in the compactors previously resulted in significant downtime of the station to remove the bridged material. This downtime has been essentially eliminated with the implementation of the composting program.

**17. If nothing, why would the State (TCEQ) approve the doubling of the capacity without improvements to the current station?**

*NTMWD does not agree that no improvements have been made to the station.*

**18. At the meeting Joe (from NTMWD) stated that this portion of the engineer's report was "wrong". What other portions of the report should we not believe?**

*It is the opinion of NTMWD that the remaining information presented in the report represents the findings of the NTMWD, the Member Cities and NTMWD's consultant as of the date of the report.*

## **OPERATIONAL DETAILS & IMPACT & MAINTENANCE**

**1. What are the "non-public" hours of operation, and do you expect these to change?**

*6 AM to 7 PM Monday through Saturday. NTMWD intends to request an open time of 7 am in the permit amendment application. Additionally, the operating hours at the existing site will change as of October 1, 2009. As of that date, NTMWD will open at 7 a.m., Monday through Saturday.*

**2. Are they part of the permit?**

*Yes.*

**3. The new facility will be enclosed. Will the doors be left open?**

*The standard operating procedure for the facility during the station operating hours will be to leave the doors open.*

**4. Will there be any overnight storage of trash?**

*No.*

**5. Is there currently any overnight storage of trash?**

*No.*

**6. What "toxic" materials (if any) will be handled at Lookout?**

*NTMWD will continue to accept those waste that are currently permitted to be accepted at the Lookout Drive Transfer Station.*

**7. Will there be a minimum 10,000-gallon fueling station for transfer station equipment and transfer vehicles as stated in the 2005 report (page 5)?**

*NTMWD is currently evaluating the fueling requirements for the entire system to determine the optimum overall installation of fuel storage for the system. A decision has not yet been made regarding the potential installation of a fueling station for the transfer station equipment on the Lookout site.*

**8. Would this be a change from what is currently permitted?**

*Currently, an underground storage tank provides fuel for NTMWD's heavy equipment and transfer trucks stationed at Lookout. An alternate scenario would be for a small above ground storage tank be located at the Lookout site solely for fueling the heavy equipment. In that scenario, trucks stationed at the Lookout site would be fueled at the 121 Regional Disposal Facility.*

**9. Has the dirt been tested for lead from bullets on the proposed site, where a Tri City gun firing range used to be?**

*This information is already posted on the NTMWD Web site. Please see the Lookout Site Master Plan Report*

**10. We have seen the EPA clean up for fire extinguishing chemicals left from the Fire Department Training Station, but what has been done about the dirt from the firing range?**

*This information is already posted on the NTMWD Web site. Please see the Lookout Site Master Plan Report.*

**11. How do you propose to monitor air quality?**

*NTMWD will submit a permit application in accordance with the TCEQ regulations regarding air quality.*

**12. Can you guarantee no odors?**

*NTMWD understands that the business of handling solid waste has the potential to produce odors that can travel off the transfer station site. NTMWD will make efforts to reduce and control odors to prevent them from being a nuisance, however, NTMWD will not guarantee that no odors will be emitted from the facility. NTMWD has shown it's commitment to the control of odors from this facility through the installation of odor control devices at the existing station, and is currently making adjustments to determine the most effective use of the odor neutralizer being used. The new building will be constructed that will allow for all waste to be deposited inside the building. This operational change will reduce the potential for odors to be emitted from the operation. NTMWD will monitor the operation to determine if odors are being detected offsite, and will take measures to decrease the potential migration of odors offsite if it is found necessary.*

**13. Will NTMWD procure a third-party audited Environmental Impact Statement for the site before beginning new construction?**

*NTMWD will prepare all reports and information that are required by the TCEQ in the permitting process.*

**14. Do you plan to monitor groundwater and soil, not unlike a Type I MSW facility?**

*The current regulations do not include the same monitoring requirements as for a Type I MSW landfill. NTMWD will install any monitoring devices that are required by the TCEQ permit.*

## **CONSTRUCTION DETAILS**

- 1. What kind of "Best Management Practices", including extensive protections for erosion and runoff, during construction phase?**

*There are Federal, State and Local requirements for erosion protection and runoff that will be included in the specifications for the construction of the transfer station.*

- 2. Will NTMWD follow nationally recognized standards (such as EPA BMP for pollution prevention in new construction) and provide documentation for each phase of the project?**

*NTMWD will develop construction specifications in accordance with all applicable Federal, State and Local regulations.*

- 3. How can we be assured that after the latest permit request is approved that the facility in Richardson will be re-built to the proper capacity and soon?**

*The existing facility is approaching 35 years old and in need of replacement. The new facility will provide for an improved operation at a higher efficiency i.e., reduced operating costs. The current schedule is to proceed with completion of the plans and specifications of the new facility construction immediately after the permit is received from the TCEQ, and bid the project as soon thereafter as possible. The Member Cities will begin to pay for the facility improvements during the fiscal year that bids are taken and bonds are sold for the construction. The Cities will want to see the construction of the new facility completed as soon as possible and in accordance with the time requirements of the contract specifications in order to receive the benefit of the new facility.*

- 4. Can the State (TCEQ) approve the permit conditionally based on the two new facilities being constructed in an agreed upon time frame?**

*This question should be answered by TCEQ.*

- 5. Is there just one permit to be applied for, or are there several? (If more than one, what?)**

*There will be an air permit, and potentially a storm water discharge permit.*

- 6. Can we get copies and a list of all the permits you are required to have in order to build this station?**

*NTMWD is required to respond in a timely manner to all requests made properly under the Freedom of Information Act.*

## **INTERNAL GOVERNANCE**

- 1. What measures do you take to verify daily tonnage?**

*NTMWD prepares reports to track tonnage accepted.*

- 2. What happens currently if you exceed the permitted amount?**

*This was responded to earlier in the document.*

- 3. Is this procedure expected to change for the future?**

*No.*

**4. Is there a staff position (dedicated time per week) to clean up Lookout and surrounding area or is it on an ad hoc basis?**

*There are dedicated positions through the use of temporary labor to provide for litter pickup. A certain number of temporary labor personnel are employed each operating day. If environmental conditions require, additional laborers are requested to provide for all labor needs to maintain compliance with the site permit.*

**5. What would you be willing to put in writing to guarantee compliance?**

*The TCEQ issues a permit to the NTMWD for the facility. The TCEQ is responsible to oversee the operation and assure the operation is in conformance with the requirements of the permit and all applicable laws and regulations. The TCEQ has the authority to issue Notices of Violation and Notices of Enforcement Action against permitted facilities that are not in compliance with the facility permit. NTMWD commits through the submission of the permit to comply with the requirements of the permit.*

**EXTERNAL OVERSIGHT & COMPLAINT PROCESS**

**1. How can we be assured the tonnage will not exceed the permitted amount?**

*If the permitted tonnage is exceeded, NTMWD will be subject to a Notice of Violation and a Notice of Enforcement Action from the regulating agency. Exceedence of the permit will require a permit amendment to be submitted for the facility. In other words, the entire process that we are going through at this time will have to be repeated, requiring Staff time and a considerable expenditure of funds. The NTMWD plans to have in place operating parameters to prevent this from occurring. NTMWD will communicate with the Member Cities if a situation were to occur to put the station in jeopardy of violating the permit requirements. NTMWD will physically close the facility for that day(s) to ensure the permitted throughput will not be exceeded.*

**RELATIONSHIP & MONEY**

**1. Who pays for the new transfer station?**

*The contracts between the NTMWD and Member Cities detail the responsibilities for payment of the costs of the system. Essentially, each Member City will pay an annual cost based on the overall system cost and that City's percentage of waste of the entire system.*

**2. Who pays for the new "storage" area?**

*This is planned to be a City of Richardson facility. The City of Richardson will fund these improvements.*

**3. Who pays for the new fire training center?**

*The City of Richardson.*

**4. Who pays for the rebuilt Lookout Dr? (Assuming it will be)**

*The City of Richardson.*

**5. Who pays for the local landscaping?**

*NTMWD will fund any landscaping on the Lookout Transfer Station site.*

**6. Has this money been budgeted, or from future bond?**

*The cost of the construction will be funded through a future bond sale.*

**7. How much will this facility cost?**

*The capital cost for the Lookout Drive Transfer Station Expansion project is estimated between \$7-8 million.*

**8. Will this be passed along to the member cities?**

*Yes. See answer above.*

**9. What is the financial operational relationship?**

*See answer above.*

**10. Do you anticipate an increase or decrease in staff running the station?**

*The staffing is being developed and will be submitted with the permit application. The total staffing has not been determined as of this date.*