

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 28, 2019

Mr. Jeffrey D. Mayfield
Assistant Deputy - Solid Waste
North Texas Municipal Water District
P.O. Box 2408
Wylie, Texas 75098

Re: Administrative Notice of Deficiency Letter
North Texas Municipal Water District - 121 Regional Disposal Facility
Melissa, Collin County, Texas
Proposed Municipal Solid Waste Permit Number: 2294
CN601365448/RN101308781
Type I Municipal Solid Waste Limited Scope Permit Major Amendment Application

Dear Mr. Mayfield:

The Texas Commission on Environmental Quality (TCEQ), Waste Permits Division has conducted an administrative review of the permit application received June 24, 2019, for North Texas Municipal Water District - 121 Regional Disposal Facility. Our review indicates that additional information must be presented to demonstrate compliance with Title 30 Texas Administrative Code (TAC) Sections 305.45 and 330.57.

Please note that this letter does not represent a detailed technical review of the application, but rather identifies certain portions of the application which have been omitted or are clearly deficient. A detailed technical review will be conducted after submittal of your response to the deficiencies noted below which follow the format of the TCEQ Municipal Solid Waste permit application form.

The deficiencies noted in the enclosed table follow the format of the TCEQ Part I Municipal Solid Waste Permit Application form. Each deficiency is uniquely identified in the enclosed table "Application Deficiencies - Administrative NOD #1" and requires your response. Responses to these deficiencies must be submitted before the application can be declared administratively complete.

Please note, when providing your response you must:

- 1) Refer to the unique deficiency identifier;
- 2) Include the location in the permit application where your response requires revisions or where you provide additional information;
- 3) Include any other narrative necessary to explain your response; and
- 4) Include replacement pages for insertion into the application; and
- 5) Each replacement page should contain a revision date and revision number

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- 6) If a revision to the application causes text to shift and/or pagination to change, please provide all pages affected by the revision(s).

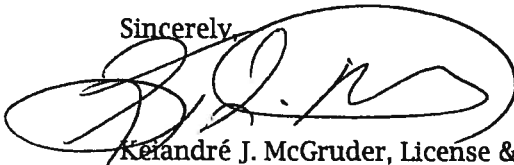
An electronic copy of the table is available upon request.

Please submit an original and three (3) copies of your application revisions, including new signature pages within 30 days of the date of this letter. Please ensure that the date the signature is signed by the owner and operator is the same date subscribed and sworn in by the Notary Public. Please also ensure that the Notary Public signs and dates the original signature page.

Failure to submit the requested information within fourteen (14) days of the date of this letter may cause the application to be removed from our list of pending applications and returned to the applicant.

If you have any questions regarding this matter, please contact me at (512) 239-4112. If you respond in writing, please include (MC-126) in the mailing address.

Sincerely,



Kerandré J. McGruder, License & Permit Specialist
Business & Program Services Section
Waste Permits Division
Texas Commission on Environmental Quality

Enclosure

cc: Mr. David Clark, P.E., Senior Engineer, Biggs & Mathews Environmental, Inc. - Mansfield

Application Deficiencies - Administrative NOD # 1

ID ¹	Def. ID	App. Section	Location ²	Citation	Error Type ³	Deficiency Description/Resolution
A1	-	Entirety	-		Omitted	Please submit the electronic version of the MSW Checklist. Only a hardcopy of the checklist was submitted with the application, please see enclosure.
A2	I	4	Pg. 1	330.59(h)(1)	Omitted	Please provide the online e-pay confirmation number.
A3	I	5	Pg. 1	330.57(i)(1)	Omitted	Please provide the URL address of a publicly accessible internet web site where the application and all revisions will be posted.
A4	I	6	Pg. 1	30 TAC 39.501(c).	Omitted	Please provide the name and professional title of the individual who will be responsible for publishing newspaper notice to the public.
A5	I	8	Pg. 8	-	Typo	Please revise and resubmit Page 2 of the Part I application regarding the public place where the application is to be held. The City of Melissa is spelled incorrectly. The information in required to complete the public notice.
A6	I	20	Pg. 10	30 TAC 39.103(c)	Omitted	Please provide the name and mailing address for the City of Melissa Health Authority. If this information is not applicable, please provide "N/A".
A7	I	Signature Page	Pg. 9	281.5(1)	Incomplete	Please resubmit a revised signed and notarized signature page for the updates to the application.

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.

Administrative and Technical Review Checklist for Municipal Solid Waste (MSW) Permits, Registrations and Amendments

This checklist is designed to provide guidance for the Municipal Solid Waste (MSW) rules found in Title 30 Texas Administrative Code (30 TAC) Chapter 330, for Type I, IV and V registration, permit, and permit amendment applications. Areas of the checklist that are shaded in gray are for information purposes only.

Please fill out application information before selecting and filling out a checklist.

Applicant Information	
Company:	<u>NORTH TEXAS MUNICIPAL WATER DISTRICT</u>
First name:	<u>THOMAS</u>
Last name:	<u>KULA</u>
Applicant Title:	<u>EXECUTIVE DIRECTOR</u>
Prefix:	
Street Address:	<u>P.O. BOX 2408</u>
City:	<u>WYLIE</u>
State:	<u>TX</u>
Zip code:	<u>75098</u>
Consultant Information	
First name:	<u>DAVID</u>
Last name:	<u>CLARK</u>
Consultant Title:	<u>SENIOR ENGINEER</u>
Prefix:	
Consultant Firm:	<u>BIGGS AND MATHEWS ENVIRONMENTAL, INC.</u>
Consultant Address:	<u>1700 ROBERT ROAD</u>
City:	<u>MANSFIELD</u>
State:	<u>TX</u>
Zip code:	<u>76063</u>
Application Information	
Facility Name:	<u>NTMWD 121 REGIONAL DISPOSAL FACILITY</u>
Application Date:	<u>6/13/2019</u>
CN:	<u>601365448</u>
MSW ID:	<u>2294</u>
RN:	<u>101308781</u>
Authorization Type:	<u>Permit</u>
County:	<u>COLLIN</u>
Application Type:	<u>Permit Amendment</u>

ID	App. Pa	Checklist Item	Item Type	Citation	Complete?	Location	Comments	Location Area
1	General	submit all four parts of the permit, permit amendment or registration application	Required	330.57(a) & (b)	Yes	N/A	LIMITED SCOPE PERMIT AMENDMENT	Permit-Application
2	General	Submit TCEQ Part I Form (Form No. 0650)	Required	330.57(c)(1)	Yes	FOLLOWING COVER LETTER		Format-Application
3	General	Part II of the application contains location and coordination information.	Informational	330.57(c)(2)				Format-Application
4	General	Part III of the application contains design information	Informational	330.57(c)(3)				Format-Application
5	General	Part IV of the application contains the site operating plan	Informational	330.57(c)(4)				Format-Application
6	General	The application should address all aspects of application and design requirements, even to show why not applicable (N/A)	Informational	330.57(d)	Yes	N/A	SEE SUBMITTAL	Format-Application
7	General	Submit data of sufficient completeness, accuracy and clarity	Required	330.57(d)	Yes			Format-Application
8	General	Failure to provide complete information may be cause for ED to return application.	Informational	330.57(d)				Format-Application
9	General	Provide 4 Copies for Initial Submittal (1 original and 3 copies)	Required	330.57(e)	Yes	N/A	COPIES PROVIDED AS REQUIRED	Format-Application
10	General	Provide 4 copies for MOD Responses including 1 copy with marked revisions (redline/strikeout)	Required	330.57(g)(6)	Yes	N/A	INITIAL SUBMITTAL	Format-Application
11	General	Application must be prepared in accordance with Texas Occupations Code, Texas Engineering Practice Act, Chapter 1001 and Texas Geoscience Practice Act, Chapter 1002	Informational	330.57(f)				Format-Application
12	General	Provide a PE signature, seal and date on the title page of each bound engineering report or individual engineering plan, and on each engineering drawing	Required	330.57(h)(1)	Yes	N/A	LOCATIONS VARY THROUGHOUT DOCUMENT	Format-Application
13	General	Provide PE sign, seal, & date for applicable items	Required	330.57(h)(2)	Yes	N/A	NO PE SEALS APPLICABLE FOR SUBMITTAL	Format-Application
14	General	Applications that are not sealed are incomplete and shall be returned	Informational	330.57(h)(3)				Format-Application
15	General	Submit Title Page with Name, Application No., Site Operator Name, Operator Name (if applicable), Location, Date Prepared and Revision Date(s)	Required	330.57(g)(1)	Yes	N/A COVER	BINDERS USED AS REQUIRED	Format-Application
16	General	Provide Table of Contents with PE seal	Required	330.57(g)(2)	Yes			Format-Application
17	General	Use 8.5x11 inch or 11x17 paper (folded to 8.5x11 inch)	Required	330.57(g)(3)	Yes	N/A	LOCATED THROUGHOUT	Format-Application
18	General	Provide pages with date (original and revised) and sequential page numbers	Required	330.57(g)(4)	Yes	N/A	LOCATED THROUGHOUT	Format-Application
19	General	Provide legible drawings/maps	Required	330.57(g)(5)	Yes	N/A	LOCATED THROUGHOUT	Format-Application
20	General	Provide color coding on all figures and drawings that is legible and distinct after copying in black & white	Required	330.57(h)(1)	Yes	N/A	LOCATED THROUGHOUT	Format-Maps/Drawings
21	General	Provide a standard engineering scale on each figure or drawing	Required	330.57(h)(2)	Yes	N/A	LOCATED THROUGHOUT	Format-Maps/Drawings
22	General	Provide a dated title block on each figure or drawing	Required	330.57(h)(3)	Yes	N/A	LOCATED THROUGHOUT	Format-Maps/Drawings
23	General	Provide a bar scale at least 1 inch on all figures and drawings	Required	330.57(h)(4)(A)	Yes	N/A	LOCATED THROUGHOUT	Format-Maps/Drawings
24	General	Provide a revision block on all figures and drawings	Required	330.57(h)(4)(B)	Yes	N/A	LOCATED THROUGHOUT	Format-Maps/Drawings
25	General	Provide a PE or PG seal, if required, on all figures and drawings	Required	330.57(h)(4)(C)	Yes	N/A	LOCATED THROUGHOUT	Format-Maps/Drawings
26	General	Include drawing number and a page number on each drawing and figure	Required	330.57(h)(4)(D)	Yes	N/A	LOCATED THROUGHOUT	Format-Maps/Drawings
27	General	Include a north arrow on each map or plan drawing	Required	330.57(h)(4)(E)	Yes	N/A	LCCATED THNCUGHCUT	Format-Maps/Drawings
28	General	Include a reference to base map & date of most current base map used, if the map is based upon another map	Required	330.57(h)(5)(A)	Yes	N/A	LCCATED THNCUGHCUT	Format-Maps/Drawings
29	General	Include a legend on each map or plan drawing	Required	330.57(h)(5)(B)	Yes	N/A	LCCATED THNCUGHCUT	Format-Maps/Drawings
30	General	Provide match lines and section lines that reference the drawing where the match or section is shown.	Required	330.57(h)(5)(C)	Yes	N/A	LCCATED THNCUGHCUT	Format-Maps/Drawings
31	General		Required	330.57(h)(6)	Yes	N/A	LOCATED THROUGHOUT	Format-Maps/Drawings

349	Part III	Provide sufficient number of cross-section w/ inset key map gas vents or wells, groundwater boring wells, initial and static levels of any groundwater encountered	Required	330.63(d)(4)(E)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Management Unit Design
350	Part III	Provide sufficient number of cross-section w/ inset key map showing the top of the levee, top of the proposed fill, top of the wastes, maximum elevation of proposed fill, existing ground, bottom of the excavations, side slopes of trenches and fill areas, gas vents or wells, groundwater monitoring wells, initial and static levels of any groundwater encountered	Required	330.63(d)(4)(E)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
351	Part III	Provide cross-sections so as to accurately depict the existing and proposed depths of all fill areas within the site. The fill cross-sections shall go through or very near the soil borings in order to show boring logs on the profile.	Required	330.63(d)(4)(E)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
352	Part III	Provide cross-sections to depict construction and design details of proposed compacted perimeter or toe berms and aerial-fill waste disposal areas	Required	330.63(d)(4)(F)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
353	Part III	Submit a Liner Quality Control Plan, prepared by a PE to include construction methods, engineering practices & the installation & testing of geomembrane (if used)	Required	330.63(d)(4)(G)	Yes	ATT. 10B		Waste Management Unit Design
354	Part III	Submit a liner design for Type I units constructed that ensures that the concentration values listed in Table 1 (Figure 30 TAC§330.331(d)(1)) will not be exceeded in the uppermost aquifer at the point of compliance	Required	330.331(e)(1)	Yes	ATT. 1G		Waste Management Unit Design
355	Part III	Submit a liner design constructed with a composite liner, and a leachate collection system that is designed and constructed to maintain less than a 30-centimeter depth of leachate over the liner	Required	330.331(e)(2)	Yes	ATT. 1G		Waste Management Unit Design
356	Part III	Submit a liner design that considers the hydrogeologic characteristics of the facility and surrounding land	Required	330.331(c)	Yes	ATT. 1G		Waste Management Unit Design
357	Part III	Submit a liner design that considers the climatic factors of the area	Required	330.331(c)	Yes	ATT. 1G		Waste Management Unit Design
358	Part III	Submit for a liner design that considers the volume and physical and chemical characteristics of the leachate	Required	330.331(c)	Yes	ATT. 1G		Waste Management Unit Design
359	Part III	Submit for a liner design that considers the quantity, quality, and direction of flow of groundwater	Required	330.331(c)	Yes	ATT. 1G		Waste Management Unit Design
363	Part III	Submit for a liner design that considers the public health, safety, and welfare effects; and	Required	330.331(c)	Yes	ATT. 1G		Waste Management Unit Design
364	Part III	Submit for a liner design that considers the practicable capability of the owner or operator.	Required	330.331(c)	Yes	ATT. 1G		Waste Management Unit Design
365	Part III	Submit a design for a liner system that includes at least four feet of in-situ soil between the deposited waste and groundwater. This in-situ soil liner must meet all the physical properties for a constructed liner as detailed in §330.339(c)(5) of this title (relating to Liner Quality Control Plan)	Required	330.331(d)(1)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
366	Part III	Submit a design for a liner system that includes at least a three-foot thick re-compacted clay liner between the deposited waste and groundwater. The constructed liner must meet all the criteria detailed in §330.339	Required	330.331(d)(2)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
367	Part III	Submit a design for a liner system that includes an alternative liner system, in accordance with §330.335 of this title (relating to Alternative Liner Design).	Required if Requested	330.331(d)(3)	Yes	ATT. 10B & 1G		Waste Management Unit Design

368	Part III	<p>330.331(e)</p> <p>Informational</p> <p>Required If Requested</p>	330.331(e)	N/A	Management Unit Design
369	Part III	<p>Demonstrate location compliance for a new landfill cell or an aerial expansion of an existing landfill cell as prescribed under 335.584(b)(1) and (2) relating to Location Restrictions.</p>	330.331(e)(3)	N/A	Waste Management Unit Design
370	Part III	<p>Provide a design for a leachate-collection and associated leachate-removal systems to be constructed of materials that are chemically resistant to the leachate expected to be generated</p>	330.333	ATT. 08	Waste Management Unit Design
371	Part III	<p>Provide a design for a leachate-collection and associated leachate-removal systems to be constructed of sufficient strength and thickness to prevent collapse under the pressures exerted by overlying wastes, waste cover materials, and by any equipment used at the landfill</p>	330.333	ATT. 16	Waste Management Unit Design
372	Part III	<p>Provide a design for a leachate-collection and associated leachate-removal systems to be designed and operated to function through the scheduled closure and post-closure care period of the landfill considering the factors prescribed under 30 TAC 330.333(A) through (G)</p>	330.333(A)(G)	ATT. 16	Waste Management Unit Design
373	Part III	<p>Submit an alternative liner designs that include a leachate management system, a demonstration by computerized design modeling that the maximum contaminant levels detailed in 30 TAC §330.331 of this title (relating to Design Criteria), Table 1 will not be exceeded at the point of compliance</p>	330.335	ATT. 16	Waste Management Unit Design
374	Part III	<p>Type IV landfills may be required to meet one or more provisions under 330.337 at ED's discretion</p>	330.337(a)		Waste Management Unit Design
375	Part III	<p>Submit calculations to demonstrate that the weight of liner & any ballast will offset uplift by a factor of 1.2</p>	330.337(b)(1)	N/A	Waste Management Unit Design
376	Part III	<p>Submit calculations to demonstrate that an active or passive dewatering system will reduce hydrostatic forces by a factor of 1.2</p>	330.337(b)(2)	N/A	Waste Management Unit Design
377	Part III	<p>Provide evidence to demonstrate that the soil surrounding the facility is so poorly permeable that GW cannot exert force on liner</p>	330.337(b)(3)	N/A	Waste Management Unit Design
378	Part III	<p>Submit evidence that the seasonal high GW is below planned excavation</p>	330.337(b)(4)	N/A	Waste Management Unit Design
379	Part III	<p>Provide for liner stability during filling through dewatering &/or ballasting approved by ED</p>	330.337(c)	N/A	Waste Management Unit Design
380	Part III	<p>Provide a leachate collection system capable of handling leachate and groundwater inflow. Submit the calculations for maximum GW inflow</p>	330.337(d)	N/A	Waste Management Unit Design
381	Part III	<p>Provide a foundation evaluation that considers the stability, settlement, and constructability prior to excavating below the seasonal high water table</p>	330.337(e)	N/A	Waste Management Unit Design
382	Part III	<p>Provide a liner quality control plan to include methods & tests to verify liner will not uplift during construction & ballast placement</p>	330.337(f)(1)	N/A	Waste Management Unit Design
383	Part III	<p>Provide measurements & test results verifying that the ballast meets criteria including inspections, compaction, weight, density, thickness, & top elevation</p>	330.337(f)(2)	N/A	Waste Management Unit Design
384	Part III	<p>Provide designs for any dewatering systems used for liner construction and filling, and indicate that the system will be operated until the ED determines it is no longer required</p>	330.337(g)	N/A	Waste Management Unit Design

385	Part III	Operating plan that provides for no brush or items in first 5 ft. of thickness	Required if Requested	330.337(b)(1)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
386	Part III	Method (if waste is to be used as ballast) for the use of a 40,000 lb. compactor or equivalent to achieve a 1,200 lbs. per cubic yard density	Required if Requested	330.337(b)(2)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
387	Part III	Submit (if waste is to be used as ballast) methods for verifying waste as ballast compaction density not less than 1200 lbs. per cubic yard. No method is required if a 40,000 lb. compactor is used	Required if Requested	330.337(b)(3)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
388	Part III	Submit a ballast evaluation report that verifies the use of a 40,000 lb. compactor or that 1,200 lbs. per cubic yard density was achieved and must be sufficient to offset hydrostatic forces by a factor of 1.5	Required if Requested	330.337(b)(4)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
389	Part III	Provide for the adjustment of seasonal high water table, if necessary, as new data is collected	Required	330.337(i)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
390	Part III	Acknowledge that a ballast evaluation report will be submitted upon completion of placement. If ED does not respond within 14 days, discontinue dewatering or ballasting	Acknowledgement	330.337(j)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
391	Part III	Acknowledge that a ballast evaluation report will be submitted to verify that the liner did not undergo uplift	Acknowledgement	330.337(k)(1)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
392	Part III	Acknowledge that a certification that ballasting met the criteria will be submitted and signed and sealed by a P.E. and signature of permittee	Acknowledgement	330.337(k)(2)-(3)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
393	Part III	Provide a liner quality control plan prepared under the direction of a licensed professional engineer.	Informational	330.339(a)				Waste Management Unit Design
394	Part III	Provide in the liner quality control plan procedures that address the installation and testing of a geomembrane liner, if used	Required	330.339(a)	Yes	ATT. 10B		Waste Management Unit Design
395	Part III	Submit constructed liner details, depicted on cross-sections of a typical cell showing the slope, widths, and thicknesses for compaction lifts	Required	330.339(a)(1)	Yes	ATT. 10B		Waste Management Unit Design
396	Part III	Provide soil and liner quality-control testing procedures, to include sampling frequency, all field sampling and testing, both during construction and after completion	Required	330.339(a)(2)	Yes	ATT. 10B		Waste Management Unit Design
397	Part III	Acknowledge that the professional of record who signs the soil liner evaluation report or his representative should be on site during all liner construction.	Acknowledgement	330.339(a)(2)	Yes	ATT. 10B		Waste Management Unit Design
398	Part III	Acknowledge that quality control of construction and quality assurance of sampling and testing procedures shall follow the latest technical guidelines of the executive director.	Acknowledgement	330.339(a)(2)	Yes	ATT. 10B		Waste Management Unit Design
399	Part III	Provide testing and reporting evaluation procedures to prepare the soil liner evaluation reports for the facility	Required	330.339(b)(1)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
400	Part III	Submit information to specify materials, equipment, and construction methods for the compaction of clay soils and depict on a drawing	Required	330.339(b)(2)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
401	Part III	Submit details and drawings for the over excavation and recompaction of the in-situ soils, or the compaction of soils from a borrow source, and cross-sections of a typical cell showing the slope, widths, and thicknesses for compaction lifts	Required	330.339(b)(2)(A)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
402	Part III	Submit procedures to be followed when excavations, cells, or disposal areas extend into or have the potential to extend into the groundwater; in accordance with 30 TAC 330.337	Required	330.339(b)(2)(B)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design
403	Part III	Provide a description of installation methods, quality control testing, reporting, following the placement of geomembrane liners	Required	330.339(b)(3)	Yes	ATT. 10B		Waste Management Unit Design
404	Part III	Provide quality control testing frequencies and procedures that are in accordance with the executive director's most recent guidelines	Required	330.339(c)	Yes	N/A	NOT REQUIRED IN SUBMITTAL	Waste Management Unit Design