MUNICIPAL SOLID WASTE PERMIT
MAJOR AMENDMENT

PART III-ATTACHMENT A
SITE DEVELOPMENT PLAN

NAME OF PROJECT: Beck Landfill

MSW PERMIT APPLICATION NO.: 1848A

OWNER: Nido, LTD (CN603075011)

OPERATOR: Beck Landfill (RN102310968)

CITY, COUNTY: Schertz, Guadalupe County

Major Amendment: Revised January 2023

Prepared by:

Civil & Environmental Consultants, Inc.

Texas Registration Number F-38
3711 S MoPac Expressway
Building 1 Suite 550,
Austin, Texas 78746
(512) 329-0006

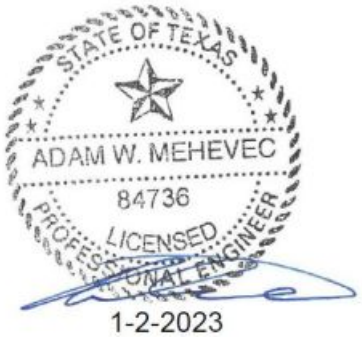
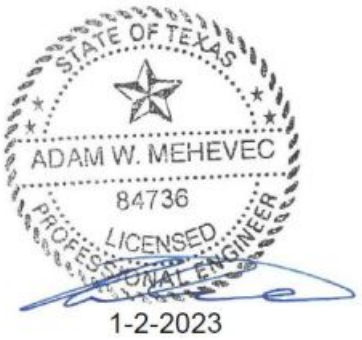


TABLE OF CONTENTS



1.0 INTRODUCTION

Consistent with 30 TAC §330.63(a), this site development plan narrative is included as Attachment A - Site Development Plan. Attachment A provides an outline of the criteria used in the design of this facility for safeguarding the health, welfare, and physical property of the public and environment. The site development plan narrative also includes references to discussion of the geology, soil conditions, drainage, land use, zoning, adequacy of access roads and highways, and other considerations specific to this facility. At the time of the submittal of the application, there were no delinquent fees shown for the regulated entity or the customer associated with this facility.

1.1 SITE LOCATION AND HISTORY

The Beck Landfill, located at 550 FM 78 in Schertz, Texas Guadalupe County, is an existing Type IV Solid Waste Disposal Facility which accepts brush, construction, or demolition waste, and/or rubbish in accordance with applicable State and Federal regulations. The Beck Landfill may not accept putrescible wastes, conditionally exempt small-quantity generator waste, or household wastes. The facility is currently owned by Cibolo Industries, Ltd. and operated by Nido, Ltd. The initial facility was given provisional authorization in 1985 by the Texas Department of Health (TDH) (See letters from TDH in Appendix A). The provisional authorization required that the facility file a MSW landfill permit application to obtain permanent authorization by November 8, 1985. MSW Permit 1848 was issued by the TDH in 1989. At the time of the 1989 application to the TDH, the applicant documented that waste disposal was taking place “in the south west end of the site, and in the north west portion of the site. These areas contain the ancient fill from Randolph Air Force Base, and part of the fill which has been placed while operating under the "Grandfather Status" set out in the compliance letter from the Texas Department of Health Bureau of Solid Waste Management dated October 16, 1985.

In addition, the application documented that gravel was “being removed from this area around the old Randolph Air Force Base fill. In general, the old fill is not being disturbed. When edges of the fill are encountered, excavation is halted, and the exposed face is investigated. If the characteristics of the fill are proper, the fill is covered immediately. Scattered and random surficial fill materials, usually 4 feet or less in depth, as well as improperly installed fills, as encountered in areas from

which gravel is to be removed, are relocated to the current fill placement area, and placed in accordance with current TDH regulations."

1.2 FACILITY DESCRIPTION

General activities which occur daily, include; but are not limited to, acceptance of construction and demolition waste; earth moving activities for periodic below-grade cell construction; excavation and application of daily, intermediate and final cover material to waste; stormwater management; minimization of leachate through currently permitted operational methods; construction quality assurance; maintenance of facility equipment, roads and structures; monitoring of groundwater; and monitoring for subsurface gas migration. The facility consists of a perimeter fence, scalehouse, maintenance shop, all-weather roads, soil stockpiles, groundwater monitoring wells, gas monitoring wells, and solid waste disposal area. Facilities for the control of stormwater runoff/run-on include benches, ditches and detention ponds and associated drainage structures.

This amendment application seeks to increase the permit boundary of the facility from 212 acres to 256.9 acres and increase the maximum permitted height of the disposal unit as depicted on the drawings included in Part III-Appendix D. No change in the permitted landfill footprint is proposed. The entire footprint of the disposal area has been previously excavated and partially filled, so no changes to the bottom excavation grades are proposed. The maximum permitted top of final cover elevation is proposed to be increased from 771 feet MSL to 890 feet MSL. No significant operational changes are being proposed as part of this amendment request.

The following table summarizes the proposed changes to the Facility Site Development and Site Operating Plans:

	Existing - Permit No. 1848	Expansion - Permit No. 1848A
Permitted Area (acres)	212	256.9
Waste Disposal Area (acres)	155	155
Total Capacity (cy)	12,383,486	26,417,117
Total Remaining Capacity	2,225,966	16,259,957
Remaining Site Life (years)	3	23
Maximum Elevation of Final Cover (msl)	771	890
Minimum Elevation of Landfill Excavation (ft-msl)	Varies based on encountered subsurface conditions	No change
Operating Hours	7:00 am to 7:00 pm	24 hours/day

Operational Procedures	Accepts brush, construction, or demolition waste, and/or rubbish	No Change
Stormwater Management System	Interim stormwater ponds only	Adding new permanent stormwater detention pond on southeast side of the landfill
Liner System Design	In-situ clay liner	No change
Groundwater Monitoring	5 monitor wells	No change
Gas Monitoring Probes	6 monitoring probes	No change

* Remaining capacity as of June 16, 2021.

1.3 LAND USE AND ZONING

An analysis of land use and potential impact on the area surrounding the facility was prepared and included in Appendix IIB. The proposed Beck Landfill is located within the city limits of Schertz, Texas. The site is currently zoned M-2 (Heavy Manufacturing), which allows for landfilling with the approval of a specific use permit. The landfill pre-dates the establishment of zoning in this area and therefore the current use is allowed to continue as long as there is no lateral expansion of the landfill.

1.4 ADEQUACY OF ACCESS ROADS AND HIGHWAYS

A transportation study providing information related to access roads and vehicular traffic with respect to the facility expansion is included in Part II. There are no existing or planned restrictions on the main access roadways within one mile of the site that would preclude safe and efficient operations for landfill vehicles and other traffic in the area.

Access to the facility from the nearest State Highway (Loop 1604) is approximately 3 miles via the intersection of Loop 1604 and Farm-to-Market Road 78 (FM 78) and approximately 4 miles south of the intersection of FM 1518 and Interstate Highway 35. There are no known weight restrictions on the local or regional roads in the proximity of the facility other than the maximum legal weight limit of 80,000 pounds. Refer to Part II, Attachment 8, for full traffic analysis and Attachment 9 for the TxDOT coordination letter.

2.0 GENERAL FACILITY DESIGN

Consistent with §330.63(b), the general facility design information for the expansion is included in Attachment B- General Facility Design. Attachment B includes narrative and drawings that

provide the required general facility design information including a discussion on facility access control as required by §330.63(b)(1), a generalized process design and working plan of the facility that describes waste movement as required by §330.63(b)(2), a description of how solid waste processing facilities will be designed to facilitate proper cleaning as required by §330.63(b)(3), a description of how all liquids resulting from the operation of solid waste processing facilities will be disposed of in a manner that will not cause surface water or groundwater pollution as well as the treatment of wastewaters resulting from the process or from cleaning and washing as required by §330.63(b)(4), and a general discussion of how the facility is designed to protect endangered and threatened species as required by §330.63(b)(5).

3.0 FACILITY SURFACE WATER DRAINAGE DESIGN

Consistent with §330.63(c), the facility surface water drainage design information for the expansion is included in Attachment C - Facility Surface Water Drainage Report. Attachment C includes a narrative discussion, drawings, and calculations that demonstrate how the facility is designed to meet the drainage and flood control requirements of §330.63(c) and §§330.303, 330.305, and 330.307. The surface water drainage design report includes analyses of the existing conditions, post-development conditions, and design of the surface water management system including final cover drainage facilities, perimeter drainage channels, and detention and sedimentation ponds; and also includes an erosion and sediment control plan for all phases of landfill development. The facility surface water drainage design report demonstrates that existing drainage patterns will not be adversely altered. In addition, a demonstration that the proposed landfill footprint and proposed processing facilities are not located within the 100-year floodway is included.

4.0 WASTE MANAGEMENT UNIT DESIGN

Consistent with §330.63(d), the waste management unit design information for the expansion is included in Attachment D - Waste Management Unit Design. Attachment D includes a narrative, drawings, and calculations that demonstrate how the facility is designed to meet §330.63(d)(1) for storage and transfer units and §330.63(d)(4) for landfill units.

The storage and transfer units located within the facility boundary will include a wood waste processing area. Attachment B - General Facility Design provides details on these storage and

transfer units. Attachment B also includes a narrative and drawings that demonstrate how the facility is designed to meet §330.63(b) and §330.63(d)(1) for general facility design and waste management unit design.

The landfill unit has been designed to meet the requirements of §330.63(d)(4), and §330.331(d)(1) for an in-situ liner. All liquids resulting from the operation of the solid waste facilities shall be disposed of in a manner that will not cause surface water or groundwater pollution. Any wastewaters resulting from waste management activities and from cleaning and washing will be treated either onsite or at an offsite treatment facility in compliance with TCEQ regulations. Beck Landfill shall ensure that stormwater and wastewater is managed in compliance with the regulations.

The landfill unit design includes provisions for all-weather operations, proposed landfill method, elevation of deepest excavation, maximum elevation of waste and final cover, waste disposal rate and operating life of the landfill, landfill unit cross sections, and construction and design details of the landfill unit. In addition, Attachment D includes the geotechnical design report for the facility, the liner quality control plan, the contaminated water management plan, and the final cover quality control plan.

5.0 GEOLOGY REPORT

Consistent with §330.63(e), the geology and soil information for the expansion is included in Attachment E - Geology Report. Attachment E includes a narrative discussion, evaluations, and figures that provide the information required by §330.63(e). The geology report includes descriptions of the regional geology and hydrogeology, geologic process, regional aquifers, subsurface investigations, geotechnical properties of subsurface soils, and fault and seismic conditions. The geology report includes the evaluation and demonstrations which confirm that the geology and soil conditions are suitable for operations as a municipal solid waste disposal facility.

6.0 GROUNDWATER SAMPLING AND ANALYSIS PLAN

Consistent with §330.63(f), the groundwater sampling and analysis plan is included as Attachment F – Groundwater Monitoring Plan. Attachment F includes a narrative discussion, evaluations, and figures that provide the information required by §330.63(f) and

§§330.401 through 330.421. The groundwater monitoring plan includes, among other things, the point of compliance, contaminant pathway analysis, groundwater monitoring program, detection monitoring program, and groundwater sampling and analysis plan.

7.0 LANDFILL GAS MANAGEMENT PLAN

The site is not required to install a gas collection and control system, however, landfill gas probes have been installed along the perimeter of the landfill to monitor for any gas traveling in the sub-surface. The landfill gas management plan is included in Attachment G. The construction and operation of the waste management facility shall comply with Subchapter U of 30 TAC Chapter 330 (relating to Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations) or other approved air authorizations. Owners or operators of these types of facilities should consult with the Air Permits Division on or before the date that the municipal solid waste application is filed with the executive director

8.0 CLOSURE PLAN

Consistent with §330.63(h), the closure plan is included as Attachment H - Closure Plan. Attachment H includes narrative, evaluations, and maps and drawings that provide the information required by §330.63(h), §330.457, §330.459 and §330.461. The closure plan includes the procedures to be taken for ongoing closure of the facility and following final acceptance of waste and certification of final closure. The closure plan describes the final cover system, closure procedures, and a closure schedule.

9.0 POSTCLOSURE PLAN

Consistent with §330.63(i), the post closure plan is included as Attachment I - Postclosure Plan. Attachment I includes a narrative discussion that provides the information required by §330.63(i), §330.463 and §330.465. The postclosure plan includes the procedures to be taken for postclosure care maintenance of the facility following closure including postclosure care certification. The postclosure plan describes the postclosure care activities, persons responsible for conducting postclosure care activities, and postclosure land use.

10.0 COST ESTIMATES FOR CLOSURE AND POSTCLOSURE CARE

Consistent with §330.630), the cost estimates for closure and postclosure care are included as Attachment J - Cost Estimates for Closure and Postclosure Care. Attachment J includes a narrative discussion, evaluations, calculations, and drawings that provide the information required by §330.630). The detailed cost estimate for closure meets the requirements of §330.503. The detailed cost estimate for postclosure care meets the requirements of §330.507. This plan also provides procedures to adjust the cost estimates during the life of the facility and describes the evidence of financial assurance, as required.

Appendix A

Original Texas Department of Health Approval Letter

Texas Department of Health

Robert Bernstein, M.D., F.A.C.P.
Commissioner

1100 West 49th Street
Austin, Texas 78756-3199
(512) 458-7111

Robert A. MacLean, M.D.
Deputy Commissioner
Professional Services

Hermas L. Miller
Deputy Commissioner
Management and Administration

OCT 1 6 1985

CERTIFIED MAIL # 501-346/501-347
RETURN RECEIPT REQUESTED

Mr. Benjamin Davis, President
Beck Ready Mix, Inc.
P.O. Box 32641
San Antonio, Texas 78216

Mr. Don McCarty
126 E. Turbo
San Antonio, Texas 78216

Subject: Solid Waste - Guadalupe County

Dear Messrs. Davis and McCarty:

This letter is in follow-up to our meeting on September 19, 1985, and the proposed improvement schedule submitted by your engineer, Mr. Walter Snowden.

Since the area in question has been in continuous use as a Type IV landfill prior to state permitting requirements, the site can remain in operation pending permit processing provided the site is otherwise in compliance with the Texas Department of Health (TDH) regulatory requirements. Inspection reports by our regional personnel reveal the site is in general compliance except for groundwater protection and submission of a complete permit application.

In accordance with TDH enforcement policy a mandatory compliance schedule for bringing the site into compliance in an orderly manner is hereby issued. Failure to comply with the following schedule will forfeit your rights to operate under a grandfather status and cause TDH to seek corrective injunctive relief and appropriate civil penalties through the office of the Attorney General.

1. Prior to November 8, 1985, you or your representative shall have completed and resubmitted Part A of the Department's permit application along with the application fee as outlined in the enclosed excerpt (Section 325.63) from the Department's regulations.

SNOWDEN, INC.

2. Prior to December 10, 1985, you or your representative shall have completed the soils investigation, topographical and boundary survey work required as a basis for preparing an operational and construction design for the slurry wall proposed by your engineers.

3. Prior to February 15, 1986, the design review documents shall be completed and submitted to the Department.

The Department will respond to this initial submittal within 15 days.

4. Within 21 days after reviewing TDH comments and approval, the plans and specifications shall be revised and the contract advertised for construction bids.

   The bidding period shall not exceed 30 days and the contract award shall be within ten days after bids are opened. Start of construction shall be within 21 days of the award of contract and the construction period shall not exceed 105 days.

If you become aware that for reasons beyond your control full compliance cannot be attained as outlined in the above compliance schedule, you should submit a written request for an extension to TDH, outlining the reason for the delay and the date that compliance will be attained.

Grandfather status is an interim status which allows operation of a facility during the completion of the permitting process. Such status is not to imply that completion and submission of a complete application is not required nor does it relieve you of any responsibility for operation in compliance with the regulations governing a permitted site.

If you have any questions concerning this letter or if we may be of any assistance to you regarding solid waste management, you may contact Mr. Jerry L. Garnett, P.E., of my staff here in Austin at telephone number (512) 458-7271 or you may prefer to contact Mr. Raymond B.

Whitley, P.E., Regional Director of Environmental and Consumer Health Protection at P.O. Drawer 630, Uvalde, Texas 78801; telephone number (512) 278-7173.

Sincerely yours,

for L. D. Thurman, P.E., Acting Chief
Bureau of Solid Waste Management

JLG:gsr

cc: Region 9, TDH
Snowden, Inc.