Municipal Solid Waste Type V Permit
MSW Permit No. 2418, High Plains Waste Water Disposal
First Technical Notice of Deficiency

NOD ID	MRI ID	App. Part	Citation	Location	NOD Type	NOD Description	RESPONSE WITH REFERENCE
	12	Gen'l.	330.57(d)	Checklist	Clarity	Use page numbers to indicate the location where a given rule is addressed.	References to Section numbers is used because it often provides more specific location on a page, and sometimes edits change the page number of that item.
	12	Gen'l	330.57(d)	Format	Clarity	1. Revise all rule citations to follow the correct format. Top-level alphabetic subsections should always be lowercase, e.g., 330.57(d) instead of 330.57(D). 2. Clearly indicate on the respective page of the application narrative where each rule in the checklist is addressed. Use the figure titles presented on the Table of Contents (TOC) to refer to each figure throughout the application. For example, if Figure 1 is titled "General Map" on the TOC, then that label should be used throughout the application. Delete Appendix 2 after relocating each of the miscellaneous items in it under the appropriate application Part (I, II, III or IV). 3. Revise the TOC to list in the TOC Parts I through IV in accordance with Chapter 330, Subchapter B and ensure each part is properly titled, e.g., "Site Development Plan" instead of "Site Plan."	1.Format revised 2.Rule citations are located in the titles of Sections. Use of only figure number references do not create confusion in this simple application, which does not have multiple figures of the same number. Putting misc items within the text creates page number and format problems as edits are made- hence, the use of Appendix 2. These formats have been commonly accepted by TCEQ. 3.Section 3.0 has been revised to Site Development Plan
	12	Gen'l	330.57(d)	Format	Completeness	Address all rules required by the checklist in the indicated Part of the application. If a rule is determined to not apply, an explanation must still be provided. If a rule has already been addressed in a prior section of the application, provide a reference to the page number where the rule has been addressed.	Some checklist items may be in the Figures or Appendices. This is generally noted on the checklist and within the Part I-IV text. The explanations of inapplicable rules are in the text at the end of each section. Some additional page references have been added where there is information similar to the rule that is being addressed.

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	12	Gen'l	330.57 (d)	II-2	Clarity	Revise the language to clarify that solid wastes sent to composting or other Type V facilities are not for disposal, but as feedstock or for further processing. Disposal only applies to a landfill.	Sect. 3.1.2.1, Pg III-2 identifies that solids will be transported to an authorized landfill, processing or compost facility. Since they are authorized facilities, handling by those facilities would be in compliance with their authorized procedures.
	12	Part III	330.57 (d)	III-2	Completeness	Describe what Phase I and Phase II consist of. Indicate whether the phases are simultaneous or consecutive; if consecutive, provide a schedule or timeframe for initiating Phase II.	Phases are described in Sec. 3.1.2.1, Pg III-1. Simultaneous phases do not occur. There is no time frame for initiating the Phases. Typically, it depends on many economic factors.
	12	Part III	330.57 (d)	III-3	Clarity	Identify the table in Section 3.1.2.3 by a number and add it to the TOC with a page number.	The table is referenced in the sentence preceding it. This is not a complex document and few tables are in it. Individual table reference should not be needed for clarity. This is commonly accepted by TCEQ.
	12	Part III	330.57 (d)	III-6	Clarity	Provide an explanation of how surface water in and around the facility shall be controlled to minimize surface water running onto, into, and off the treatment area.	Sec. 3.2, Pg III-6 has been edited
	20	Gen'l	330.57 (g)(1)	Format	Completeness	Submit application and revisions in one or more three-ring binders.	The original submittal was provided in 3-ring binders.
	21	Gen'l	330.57 (g)(2)	Format	Completeness	Revise all title pages, including those for attachments and appendices, to include the nearest city.	The facility is not in a City, and making such a reference would be confusing. This has historically been acceptable to TCEQ.
	24	Gen'l	330.57 (g)(5)	Format	Clarity	Provide a page number and date for every page of the application, including figures and appendices.	Text had page numbers and date, Figures have Figure number and date, page numbers and dates have been added so some Appendix pages.
	26	Gen'l	330.57 (h)(2)	Figures 1, 7, 8	Clarity	Revise figures to render all text and symbology legible when printed in black and white.	Figures revised for visibility.
	34	Gen'l	330.57 (h)(5)(B)	Figure 1	Completeness	Provide a more specific reference to the base map used.	Revised
	68	Part I	§330.59 (a)(1)	TCEQ-00650	Completeness	Revise Section 16 to identify the wastes accepted at the facility for processing.	Revised
	82	Part I	330.59 (c)(2)	Figure 1	Completeness	Revise map with the appropriate scale of 1 inch = 1 mile.	The current map is at the ½" = 1 mile scale required by the rule

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	83	Part I	330.59 (c)(3)(A)	Figure 4	Clarity	Revise the legend to distinguish Site Boundary from ¼ mile radius.	Revised
	132	Part II	330.61 (h)	II-6	Completeness	Briefly expand on the discussion about the surrounding property noted in the application. This discussion may include amounts, types, and location respective to the facility, of the parts and materials.	See Sec. 2.4.1, pg. II-6 and the referenced Sec. 2.3, pg. II-5 in the text. These provide a complete description of surrounding property
	171-182	Part II	330.61 (c)	n/a	Completeness	Submit a legible general location map with the following information: • water wells within 500 feet; • inhabitable building and other structures within 500 feet; • location and surface type of all roads within one mile of the facility; • access controls; • area streams; • drainage ditches and/or runoff patterns; and • any other features if applicable under this subsection.	A 500 ft radius and a habitable structure note has been added to Figure 3. Road surfaces are shown on Figure 3. Water well is shown on Figures 3 and 8. Access control fence and gates are shown on figure 8; streams on Topo Fig 2; runoff patterns described on pg II-9 "Surface Water Near Site".
	183	Part II	330.61 (d)	Figure 4-1	Completeness	Submit Figure 4-1 annotated on Figures 8 & 9, but not found in the application.	Figure 4-1 is currently found in Appendix 4 (resubmitted)
	183	Part II	330.61 (d)	Figure 9	Completeness	Revise to a proper site layout map, drawn to scale, to distinctly show: • the property and permit boundaries; • interior facility roadways and fencing; • all other structures in the facility immediate vicinity; • the location of processing and storage equipment; and • chemical tanks, dump trailer, and other ancillaries. *Note – In accordance with 330.543(b)(1), the permit boundary must be a closed perimeter and a 50-foot dedicated buffer zone must be shown and each piece of equipment will be identified by a legible label.*	Boundaries, structures and fencing are shown on Figure 8. Figure 9 shows additional layout details (process and storage equipment and chemical tanks) at a scale appropriate for clarity on a 11x17 figure. Dump trailer, portable pumps etc are portable and location will vary during operations. The 50 ft Buffer is shown on Fig 8 and 9. See description in Sec. 2.13, pg. II-11.
	189	Part II	330.61 (d)(5)	Figure 8	Completeness	Provide proper annotation.	Legend and features revised on Fig 8 and 9 for clarity.

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	156	Part II	330.61 (k)(3)(B)	II-8, 9	Completeness	Provide a copy of the permit number of the facility receiving the wastewater and any permit requirements under TPDES or other agencies.	WWTP Permit number is provided on pages II-9 and IV-6.
	198	Part II	330.61 (e)	Figure 2	Completeness	Provide topographic map with legible contours at a scale of 1 inch = 2000 feet (submitted map is scaled 1" =3000').	Fig 2 Topo map contour color revised. Map is at the scale required by the rule.
	274	Part III	330.63 (b)(2)(C)	III-3	Completeness	Add ventilation for odor control and employee safety. Odors may not be adequately controlled by covering or limiting exchange of air as indicated in Section 3.1.2.2.	Edits are made to Sec. 3.1.2.2, pg. III-3 to describe features typically used at similar facilities.
	276-278	Part III	330.63 (b)(2)(D)-(F)	III-(3-7)	Completeness	1. Provide for pump sizes and pumping rates. 2. Regarding the pH adjustment system: • Indicate whether pH is adjusted on the influent waste or the effluent wastewater. • Discuss the purpose of the pH adjustment.	Specific pump sizes are not critical and will be selected by the operator to match desired operating characteristics of the business. pH adjustment is optional and has been used in some facilities for odor control, satisfactory flocculant performance or wastewater buffering desired by the wastewater treatment plant. Text has been added to pg. III-2.
	278	Part III	330.63 (b)(2)(F)	III-6,7	Completeness	Provide for at least one foot of freeboard for all unloading, storage, and processing areas that are not covered by a roof.	Spill containment is not an impoundment requiring 1 ft freeboard. Rainfall is accounted for in the spill containment design. Freeboard less than a foot has been commonly accepted for other similar facilities.
	278	Part III	330.63 (b)(2)(F)	Figure 9	Completeness	Show caustic injection point.	Use of caustic is optional, and it may or may not be used in various locations anywhere in the process as required for satisfactory processing or wastewater buffering.
	278	Part III	330.63 (b)(2)(F)	App 4-1	Completeness	Submit Figure 4.1.	Another copy is provided for Appendix 4
	279	Part III	330.63 (b)(2)(G)	III-5	Completeness	Explain why the dewatered material might need to be reprocessed and why it would take up to 7 days to reprocess it.	Reprocessing clause has been removed.
	279	Part III	330.63 (b)(2)(G)	III-4, 5	Completeness	Include a discussion of how long processed wastewater will remain on-site.	Holding time added to Sec. 3.1.2.4, pg. III-4

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	282	Part III	330.63 (b)(3)(A)	III-5	Completeness	Provide a minimum frequency for inspecting and cleaning the processing equipment and any areas subject to washdown.	In Sec. 3.1.3, pg. III-6 a reference to Section 4.13 is added, where frequency is discussed.
	287	Part III	330.63 (b)(5)	III-6	Completeness	Correct the reference to Section 2.8. The specified section addresses abandoned wells, not endangered species.	Reference is changed to Sec. 2.10.
	288	Part III	330.63 (c)	III-6	Completeness	Acknowledge that the facility design complies with, or will be modified to comply with, the requirements of 330.303(a) - (b).	Sec 3.2, pg. III-6 text revised to acknowledge requirements of 330.303.
	340	Part III	330.63 (d)(1)(A)	II-6,7	Completeness	1. Explain how the earthen berm containing the storage tank area will prevent contamination to groundwater. 2. Demonstrate that the earthen berm is adequate to contain a spill from the largest tank while maintaining 1 foot of freeboard. 3. Clarify if the four storage tanks will be used to store both processed and unprocessed waste.	1. Immediate cleanup and spill recovery is described in Sec. 4.7, pg. IV-15; Fig 4-1 indicates berm constructed with compacted clayey soil. 2. Spill containment is not an impoundment requiring 1 ft freeboard. (See previous response comment). 3. Tanks will store only incoming liquid wastes or process wastewater.
	339	Part III	330.63 (d)(1)(A)	III-6,7	Clarity	Explain how the 4,878-gallon sump may contain a spill from either of the 21,000-gallon processing tanks.	The 21,000 gallon tanks are not in the area of or served by the sump. A spill from these tanks is contained in the berm.
	341	Part III	330.63 (d)(1)(B)	III-6,7	Completeness	1. Show details of the floor plan of the Processing Building; include drains location, surface slopes and any partitions separating different units. 2. Submit additional design specifications of the surface impoundment including a clear plan view and detailed cross-section of the impoundment.	1. See Figure 4.1, slab elevations shown in Appendix 1. No partitions. 2. Shown in Figure 4-1
	341	Part III	330.63 (d)(1)(B)	App 4-4	Completeness	Provide a floor layout of the processing building; show the floor grading and floor drains locations.	See Figure 4-1
	341	Part III	330.63 (d)(1)(B)	App 4-3	Clarity	Explain why the Frac Tank dimensions provided are larger than the stated tank capacity of 21,000 gallons.	Frac tank dimensions are typical outside dimensions including the trailer frame. These dimensions are used to calculate displacement of liquid in a spill which reduces the spill storage volume.

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	744	Part III	330.505 (a)(2)(B-C)	App 5-5	Accuracy	Revise to use cubic yards or short ton measurements where applicable.	Gallons are used for volume measurement and unit cost of liquids. Note 4 explains solids disposal costs.
	990	Part IV	330.203 (b)	IV-5	Clarity	1. Provide a breakdown of the expected waste types to be accepted. If the waste types are expected to change over the course of the year, include a discussion of this. 2. Revise the maximum amount of waste to be stored on-site, including solids. 3. Explain how recovered solids will be stored. 4. Explain how the collective 84,000-gallon capacity of tanks will be sufficient to store the expected 100,000 gallons of waste to be processed daily.	1. The last paragraph of Sec. 4.1.1, pg. IV-3 discusses breakdown of wastes. 2. Maximum waste storage volume is discussed in Para 1 of Sec. 4.1.5 pg. IV-5. 3. Recovered solids storage is discussed in the last paragraph of 4.1.5 pg. IV-5. 4. To achieve 100,000 gpd, tanks will be drained in the course of processing. Recovered wastewater will be pumped to wastewater storage tanks and the water hauled to the wastewater treatment facility continuously during the day. In the future, a sewer line or compost facility may be available nearby to reduce the amount of wastewater hauling required (mentioned in Sec.3.1.2.4 pg. III-4).
	990	Part IV	330.203 (b)	IV-6	Completeness	Provide for the following: • types and estimate of the amount of each waste to be received daily; • the maximum and average waste residence times; and • the maximum and average waste processing times.	• Wastes are variable and the volume of each cannot be predicted, but the mix of wastes doesn't affect the ability to process. This and total accepted volumes are discussed in Sec. 4.1.1 pg. IV-1. • The maximum and average times the waste will be stored at the facility is described in Paragraph 1 of Sec. 4.1.5 pg. IV-1. • Processing times are described in paragraph 2 of Sec. 4.1.5 pg. IV-5.

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	994-995	Part IV	330.203 (c)(2)	IV-5	Completeness	1. Provide at a minimum for analyses of received wastes for benzene, lead, and total petroleum hydrocarbons (TPH). 2. Acknowledge that grit trap wastes must be analyzed annually for biochemical oxygen demand, total suspended solids, benzene, TPH, and lead.	Stated in paragraph 1 of Sec. 4.1.4 pg. IV-4.
	1013	Part IV	330.207 (a)	IV-6	Completeness	Provide a signed agreement with the POTW if planning to discharge to a city sewer.	Discharge will not be to a sewer unless one is provided to this area in the future. The operator will provide for authorized disposal of wastewaters resulting from managing the waste or from cleaning and washing by transport to a wastewater facility. A discharge permit to the Amarillo WWTP is listed in Sec. 4.1.6, pg. IV-6.
	1065	Part IV	330.227	IV-6	Completeness	Provide for the containment of spills for the caustic and polymer tanks; explain how these chemicals will be handled if they spill and drain into the sump.	Reference made here to Section 3.1.3 and also to Sec. 4.7, where the 330.227 discussion was expanded.
	1084	Part IV	330.241 (c)	IV-16, 17	Completeness	In the event that part or all of the facility becomes inoperable for greater than 24 hours: 1. Provide a protocol for the disposal of existing processed and unprocessed waste onsite. 2. Elaborate on the potential use of a mobile processing unit, including any anticipated changes to the standard operating procedures and facility design.	Sec. 4.12, pg. IV-17 has been revised to meet the accumulated solid waste disposal requirements of 330.241. A mobile processor has been removed since they are rare or non-existent even though described in the rules.