



**Texas Commission on Environmental Quality
Waste Permits Division Correspondence
Cover Sheet**

Date: January 12, 2024
 Facility Name: High Plains Waste Water Disposal
 Permit or Registration No.: 2418

Nature of Correspondence:
 Initial/New
 Response/Revision to TCEQ Tracking No.: 28468038 (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
<input type="checkbox"/> New Notice of Intent	<input type="checkbox"/> Alternative Daily Cover Report
<input type="checkbox"/> Notice of Intent Revision	<input type="checkbox"/> Closure Report
<input checked="" type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Compost Report
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Groundwater Background Evaluation
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure	<input type="checkbox"/> Other:

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> CCR Registration	<input type="checkbox"/> Extension Request
<input type="checkbox"/> CCR Registration Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> CCR Registration Minor Amendment	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Waste Minimization Report
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> 335.6 Notification	
<input type="checkbox"/> Other:	

Jerry W. Andersen, PG
Professional Geologist

January 12, 2024

Jason Batocchi, Project Manager
Municipal Solid Waste Permits-M/C 124
Texas Commission on Environmental Quality
PO Box 13087
Austin, Texas 78711-3087

RE: High Plains Waste Water Disposal – Tracking Number 28468038

Dear Mr. Batocchi:

Attached, please find the HPWWID response to your NOD email of December 28, 2023.

Enclosed, please find the following:

Correspondence Cover Sheet (Form TCEQ-20714)
This dated cover letter
Third NOD with comments, responses, and location of each revision by reference to part,
section, and page number
Part IV, page IV-6, Section 4.1.6; wastewater facility ID is WQ0010392003
D 3 11X17 Topographic Plat provided
Appendix 6 Panhandle Regional Planning Commission letter
revised applicant certification (00650)

An email containing the above submittals will be sent with three copies sent via post.

Please feel free to call me at 806.679.9735 with questions.

Sincerely,


Jerry W. Andersen, PG

App Part	Citation	Location	NOD Type	NOD Description	Response
1 Part IV	330.20Z	IV-6	Completeness	Provide the name of the wastewater facility with Registration No. 24320.	Name and Permit number are provided.
2 Appendices & Figures	330.57(d)	Figure 9 and App 4-1	Clarity	Indicate the envisioned Phase II changes to the facility. You may provide a separate figure to show this if necessary.	Ph II changes are shown and labeled on Fig. 9
3 Figures	330.61(e)	2	Completeness	Provide a 11x17" topographic map.	A newly sealed 11x17 Figure 2 is provided in the digital and hard copies.
5 Appendices	330.61(i)(4),(p)	6	Completeness	Provide the final response letter from the COG. If it has not yet been received, provide it at the earliest opportunity.	COG Letter is included for Appendix 6
6 General	330.57(i)	General	Completeness	Update the application posted at the URL designated on the Part 1 Form. The initial application and all NOD responses, as submitted to the MSW Permits Section, must be available for public viewing on both the website and at the physical posting location.	Initial Application and all NOD responses are posted at the URL.

Hard copies of Appendix 5 pages that were intended to be submitted with NOD 2 are enclosed herein. The Original Submittal Sealed Part 1 page is included. Sealed Part II and III cover pages associated with the NOD 2 submittal are provided in the NOD 3 digital file and the hard copies. Newly sealed cover pages are provided for the main cover page and Part IV Cover Page -sections that were edited with NOD 3.

Red Line Copy

solids content of the wastes being processed will vary from 1% to over 25%, depending on waste type and source. An average 15% solids content can be conservatively assumed for an estimate of the maximum amount of solids which may be produced daily from a mixed waste stream. Assuming an average solids content of 15%, the quantity of processed waste solids expected at maximum production is 75 cy/day (average wastes processed = 100,000 gallon/day → 13,370 cf/day x 0.15 typical avg. solids content = 2005 cf/day = 75 cy/day).

Processed solids are retained in the processing unit. The solids will be removed from the facility in the roll-off processing units or transferred to a more efficient over-the-road roll-off, dump or tank truck for transport. Any loaded solids containers will be covered. The solids will be taken to an authorized compost facility, processor or one of the permitted MSW landfills located in the area. If solids will go to a compost facility, grit trap waste will either be handled separately from other wastes, or it will be tracked through the process so that recovered grit trap solids or liquids will not be transported to a compost facility.

4.1.6 Contaminated Water Management, 330.207

All liquids resulting from the operation of the facility will be disposed of in a manner that will not cause surface water or groundwater pollution. 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 (Reg-24320WQ0010392003 City of Amarillo). Discharge to a septic system is prohibited.

Wastewaters discharged to a treatment facility permitted under Texas Water Code, Chapter 26 will not:

1. interfere with or pass-through the treatment facility processes or operations,
2. interfere with or pass-through its sludge processes, use, or disposal, or
3. otherwise be inconsistent with the prohibited discharge standards, including 40 Code of Federal Regulations Part 403, General Pretreatment Regulations for Existing and New Source Pollution.

Any requirements set by the receiving wastewater facility will be met.

**HIGH PLAINS WASTE WATER DISPOSAL
TYPE V-GG PROCESSING FACILITY
RANDALL COUNTY, TEXAS**

MSW PERMIT 2418 APPLICATION

INITIAL SUBMITTAL MARCH 31, 2023
REVISION 04 January 12, 2024

FOR

HIGH PLAINS WASTE WATER DISPOSAL, LLC
500 W. McAFEE ROAD
RANDALL COUNTY, TEXAS

Prepared by:

JERRY W. ANDERSEN, PG
ANDERSEN & ASSOCIATES COMPLIANCE CONSULTANTS, INC.
2318 VICTORIA
AMARILLO, TEXAS 79106
806.679.9735

J. BRIAN DUDLEY, P.E.
BRIAN DUDLEY ENGINEERING
16904 GOLDENWOOD WAY
AUSTIN, TEXAS 78737
REGISTERED ENGINEERING FIRM F-15657



Signature Page

Site Operator or Authorized Signatory

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Willis Malone Title: Managing Member

Email Address: bull1@am.net

Signature: Willis E. Malone Date: 1/8/2024

Operator or Principal Executive Officer Designation of Authorized Signatory

To be completed by the operator. If the application is signed by an authorized representative for the operator:

I hereby designate Jerry Andersen as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Operator or Principal Executive Officer Name: Willis Malone

Email Address: bull1@am.net

Signature: Willis E. Malone Date: 1/8/2024

Notary

SUBSCRIBED AND SWORN to before me by the said Willis E. Malone

On this 8 day of January, 2024

My commission expires on the 31st day of March, 2027
11th th

Notary Public in and for

Pattah County, Texas

Note: Application Must Bear Signatory & Seal of Notary Public



**HIGH PLAINS WASTE WATER DISPOSAL
TYPE V-GG PROCESSING FACILITY
RANDALL COUNTY, TEXAS**

MSW PERMIT APPLICATION

**PART I FORM AND GENERAL INFORMATION
PART I**

INITIAL SUBMITTAL MARCH 31, 2023

FOR

HIGH PLAINS WASTE WATER DISPOSAL, LLC
500 E. MCAFEE ROAD
RANDALL COUNTY, TEXAS

Prepared by:

JERRY W. ANDERSEN, PG
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REGISTERED ENGINEERING FIRM F-15667



**HIGH PLAINS WASTE WATER DISPOSAL
TYPE V-GG PROCESSING FACILITY
RANDALL COUNTY, TEXAS**

MSW PERMIT 2418 APPLICATION

**GENERAL INFORMATION
PART II**

INITIAL SUBMITTAL MARCH 31, 2023

REVISION 03 November 16, 2023

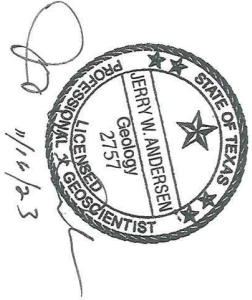
FOR

HIGH PLAINS WASTE WATER DISPOSAL, LLC
500 W. McATee ROAD
RANDALL COUNTY, TEXAS

Prepared by:

JERRY W. ANDERSEN, PG
2318 VICTORIA
AMARILLO, TEXAS 79106
806.679.9735

J. BRIAN DUDLEY, P.E.
BRIAN DUDLEY ENGINEERING
16904 GOLDENWOOD WAY
AUSTIN, TEXAS 78737
REGISTERED ENGINEERING FIRM F-15665



**HIGH PLAINS WASTE WATER DISPOSAL
TYPE V-GG PROCESSING FACILITY
RANDALL COUNTY, TEXAS**

MSW PERMIT 2418 APPLICATION

**SITE DEVELOPMENT PLAN
PART III**

INITIAL SUBMITTAL MARCH 31, 2023
REVISION 03 November 16, 2023

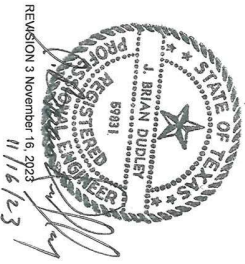
FOR

HIGH PLAINS WASTE WATER DISPOSAL, LLC
500 W. McAfee ROAD
RANDALL COUNTY, TEXAS

Prepared by:

JERRY W. ANDERSEN, PG
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AUSTIN, TEXAS 78737
REGISTERED ENGINEERING FIRM F-15657



**HIGH PLAINS WASTE WATER DISPOSAL
TYPE V-GG PROCESSING FACILITY
RANDALL COUNTY, TEXAS**

MSW PERMIT 2418 APPLICATION

**SITE OPERATING PLAN
PART IV**

INITIAL SUBMITTAL MARCH 31, 2023
REVISION 04 January 12, 2024

FOR

HIGH PLAINS WASTE WATER DISPOSAL, LLC
500 W. McATee ROAD
RANDALL COUNTY, TEXAS

Prepared by:

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AUSTIN, TEXAS 78737
REGISTERED ENGINEERING FIRM F-15657



IV-1

REVISION 4 January 12, 2024

1/12/24

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Any requirements set by the receiving wastewater facility will be met.

SECONDARY CONTAINMENT CALCULATIONS (330.227)

APPENDIX 4

This Appendix presents the High Plains Waste Water Disposal Facility secondary containment for spilled waste and rainwater at the unloading, processing and waste storage tank areas shown in Figure 4-1. The areas are designed to control and contain spills and contaminated water from leaving the facility. Each area is designed to contain spilled waste equal to the capacity of the largest liquid storage vessel. Additionally, 4.93 inches of rain from the 25 year, 24 hour storm (NOAA, Atlas 14) is controlled by:

- preventing accumulation with a roof, or
- providing full storage capacity at the area.

The calculations for secondary containment volumes are included as Tables in this Appendix.

Waste Storage Area

The design conditions assume that the largest 21,000 gallon waste storage tank leaks and loses all the liquid volume above the height of the released liquid contained inside the storage area. The other tanks remain intact, and they displace spill volume. This volume is subtracted in the storage calculations. The storage tanks are enclosed with a 2.5 ft tall clayey soil berm which is shown in Figure 4-1. This provides sufficient capacity to contain both the spilled volume of the largest tank and water from the 25 year, 24 hour storm, and it has 8 inches of freeboard above the level of the spill.

Processing Building, Including the Indoor Truck Unloading Area

Because the building contains a roof and its slab is elevated above surrounding grade, rainwater is not a factor in spill containment. The design conditions for the processing building assumes that a 5000 gallon tanker truck leaks and loses all of the liquid. The 4,847 gallon processing units in the building remain intact, and since they are elevated above the slab, their presence does not reduce the storage capacity within the containment. An office area and two lime and polymer tanks may be present in the building which displace storage volume, and this is subtracted in the calculations. The building contains a concrete slab which is sloped from the building perimeter to

App. 4-1



a sump near the center of the building. The sloped slab will contain 0.13 ft of liquid adjacent to the sump without a spill leaving the building. A 4847 gallon sump is located near the center portion of the building, bringing total spill capacity to 7218 gallons. This provides sufficient capacity to contain a 5000 gallon spill.

App. 4-2

HIGH PLAINS WASTE WATER DISPOSAL

Bermed Waste Storage Area Without Roof -- Secondary Containment Calculations

A. Minimum required containment is equal to the Rainfall from the 25-yr, 24-hr storm plus the capacity of the largest tank (21,000 gal frac tank).

NOAA Atlas 14, 25-yr, 24-hr Precipitation, Amarillo, P= 4.93 in = 0.410833 ft

Containment
Footprint Area, A = 4,550 ft² (65 x 70 ft)

Rainfall Volume = P x A 1,869 ft³
13,982 gallons

Volume of largest tank = 21,000 gallons

Total Req'd Storage Volume without Roof = 34,982 gallons

B. Volume Provided without any Tanks in the Area

Secondary Containment Volume

Bottom W= 55 ft

Bottom L= 60 ft

Bottom Area, A_B = 3300 ft²

Inundated Top Area, A_T = 4196.938 ft² (includes inundated berm slope)

Storage depth h = 1.833 ft

Volume Provided = 6,854 ft³ (frustum equation = $h/3(A_B + A_T + (A_B A_T)^{1/2})$)
51,271.6 gallons

C. Volume Reduction - Three 21,000 gal storage tanks

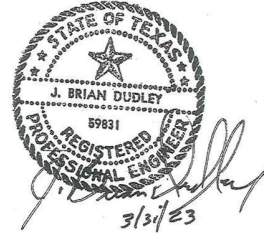
(Frac Tank = 42'L x 8.5'W x 11'H)

Volume Reduction V= 1,963 ft³
14,684.3 gallons

D. Resulting Volume Provided = (B-C) = 36,587.3 gallons

Excess Containment Volume Provided = (D-A) = 1,605 gallons

Berm Specifications (minimum): 55' x 60' bottom area dimensions, 2.5' height (including 8" freeboard), 2H:1V surface slopes with 2' crest width, compacted clayey soil material.



HIGH PLAINS WASTE WATER DISPOSAL

HIGH PLAINS WASTE WATER DISPOSAL
Processing Building -- Secondary Containment Calculations

A. Minimum Required Containment

This area is within a building so the minimum required containment is equal to the capacity of the largest tank. Rainfall = 0".
 The largest tank is a 5000 gallon tanker truck. Also in the building are the rolloff processing units which are elevated above the slab.
 Volume of process unit = $24 \text{ yd}^3 = 4,847 \text{ gallons}$ (unit's working capacity is 80% x 30 cy due to liquid fill ports)

Total Req'd Storage Volume = 5,000 gallons

B. Volume Provided without any Tanks or Office in the Area

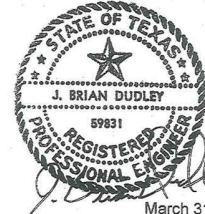
Secondary Containment Volume
 Building Area = 5000 ft² (50 x 100 ft with floor sloped to sump)
 Sloped slab spill storage depth = 0.13 ft (surveyed slope from slab perimeter to sump)
 Volume Provided = 325 ft³ (Area x storage depth/2)
 2,431 gallons
 Additional Sump Volume = 4847 gallons (sump dimension = 4' x 24' x 6' deep + steps @ 4' x 6' x 6'/2 = 648 cf = 4847 gallons)
 Total Volume Provided = 7,278 gallons

C. Volume Reduction - One lime and One polymer storage tank; and office.

Cylindrical Tanks-	<u>5 ft Dia</u>	<u>6 ft Dia</u>	
A = $\pi R^2 =$	20 ft ²	28 ft ²	
V = A(avg spill depth) :	0.6 ft ³	0.9 ft ³	(tanks are near bldg perimeter so avg spill depth = 0.13/4 = 0.0325')
Office area -	6.5 ft ³		(10' x 20' x 0.0325' avg depth, office is at slab perimeter)
Total Reduction =	8 ft ³		
	<u>60 gallons</u>		

D. Total Volume Provided) = 7,218 gallons
(B.- C.)=

Excess Containment Volume
Provided = (D.-A.) = 2,218 gallons



March 31, 2023

FACILITY CLOSURE PLAN

1.0 CLOSURE REQUIREMENTS, 330.63(h), 330.459 and 330.461



No later than 90 days prior to the initiation of a final facility closure, High Plains Waste Water Disposal (HPWWD) shall, through a public notice in the newspaper(s) of largest circulation in the vicinity of the facility, provide public notice for final facility closure. This notice shall provide the name, address, and physical location of the facility, the permit number, and the last date of intended receipt of waste. HPWWD shall also make available an adequate number of copies of the approved final closure plan for public access and review. The facility will also provide a written notice to the TCEQ Executive Director of the intent to close the facility and will place this notice in the operating record.

Upon notification to the Executive Director, HPWWD will post a minimum of one sign at the main entrance and all other frequently used points of access for the facility notifying all persons who may utilize the facility or site of the date of closing for the entire facility or site and the prohibition against further receipt of waste materials after the stated date. To prevent the unauthorized dumping of solid waste at the closed facility, suitable barriers will be installed at all gates.

Within 10 days after completion of final closure activities of the facility, HPWWD will submit the certification of final closure and all necessary documents by registered mail.

All unprocessed, in-process, and processed material on-site will be evacuated to an authorized facility and remaining waste handling units and the loading/unloading/processing areas shall either be dismantled and removed off-site or decontaminated.

If there is evidence of release from the facility, the Executive Director may require an investigation into the nature and extent of the release and an assessment of measures necessary to correct an impact to groundwater.

HPWWD will complete final closure activities for the facility in accordance with the approved final closure plan within 180 days following the most recent acceptance of processed or unprocessed materials unless otherwise approved in writing by the executive director.

Within 10 days following completion of all final closure activities for the facility, HPWWD shall submit to the executive director a request for voluntary revocation of the facility permit and a documented certification, signed by an independent registered professional engineer, verifying that final closure has been completed in accordance with the approved final closure plan. The submittal to the executive director shall include all applicable documentation necessary for certification of final closure.

There will be no wastes remaining on-site after closure and no post-closure maintenance will be required.

2.0 CLOSURE COST ESTIMATE, 330.63 (j), 330.505

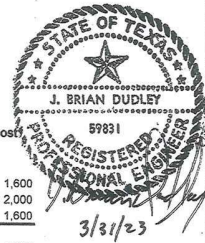
The following tables are a description of closure activities that would be required to be performed by a third party to close the facility. This closure cost estimate is the basis for the amount of financial assurance to be provided and assumes worst-case waste inventory conditions exist at the facility at the time of closure. The required documentation for financial assurance shall be submitted within 60 days of Permit Amendment approval and 60 days prior to initiation of Phase II operations. There are closure cost estimates included with this plan for both Phase I and II operations. The cost estimate representing actual conditions should be used at any time during the life of the facility. An increase in the closure cost estimate and the amount of financial assurance will be made if any changes to the facility conditions increase the maximum cost of closure at any time during the active life of the facility.

The financial assurance will be established and maintained for closure of the facility in accordance with TAC Chapter 37, Subchapter R, including annual inflation adjustments as required by TCEQ. Continuous financial assurance coverage for closure must be provided until all requirements of the final closure plan have been completed and the site is determined to be closed in writing by the Executive Director. Closure activities would include at a minimum the following activities:

- Sampling and removal of all waste stored on-site. Closure costs assume that all storage tanks are full of unprocessed material and all processing tanks and units are full of waste or solids. These materials will be sampled for characterization and then transported to an authorized processing or composting facility or landfill for disposal;

- Washdown of all process areas, disconnection of pumps and other equipment so unauthorized use could not occur; and
- Final cleanup of site litter and debris, securing the site and vector control.

**CLOSURE COST ESTIMATE
HIGH PLAINS WASTE WATER DISPOSAL FACILITY
PHASE 1**



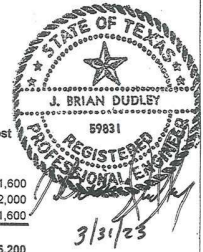
CLOSURE ELEMENT DESCRIPTION - PHASE 1

	Unit Measure	Unit Cost	Number of Units	Total Cost
A. State administration of site closure				
1. Observe site and review file to determine closure activities	Hour	\$100.00	16	\$ 1,600
2. Prepare bid documents and procure bids	Hour	\$100.00	20	2,000
3. Contract award and administration of contract	Hour	\$100.00	16	1,600
			Subtotal Part A.	\$ 5,200
B. General cleanup of the site and process unit(s)				
1. Waste Sampling / testing / classification				
a. Classification Sampling (2 samples)				
- Liquids (1 Composite Sample)	Composite Sample	\$800.00	1	\$ 800
- Solids (1 Composite Sample)	Sample	\$590.00	1	590
b. Sampler Costs				
c. Sampling supplies /travel / per diem	Hour	\$100.00	2	200
Lump Sum		\$200.00	1	200
2. Transport and/or disposal of waste at a properly authorized facility				
a. Unprocessed waste and process tank - 2 @21 Kgal	gallon	\$0.15	42,000	6,300
b. Grit and Processed solids (transport and disposal at a landfill)	Rolloff Process Unit (each)	\$1,030.00	2	2,060
c. Waste water effluent holding tanks - 2 @21 Kgal	gallon	\$0.05	42,000	2,100
d. Washdown water (to city wastewater plant)	gallon	\$0.05	10,000	500
e. Preparation of disposal paperwork	Hour	\$100.00	3	300
f. Lime and polymer tanks	gallon	\$0.15	4,000	600
3. General cleanup (labor and supplies for washdown, disinfection, decontamination of concrete and units, disconnecting and storage of equipment)				
Hour		\$100.00	16	1,600
4. Vector control procedures				
Lump sum/month		\$300.00	1	300
			Subtotal Part B.	\$ 15,550
C. Completion of cleanup				
1. Sign installation, securing buildings and access				
Lump Sum		\$1,000.00	1	1,000
2. Perform site inspection and prepare certification of work completion				
Hour		\$150.00	16	2,400
			Subtotal Part C.	\$ 3,400
D. Contingency cost				
			15% of A.-C. Total	\$ 3,623
			CLOSURE COST TOTAL (2023 dollars)	\$ 27,773

ASSUMPTIONS:

1. All costs reflect the work being performed by an independent third party contractor, administered by TCEQ.
2. No waste material will be accepted after the closure filing date.
3. Assume two waste receiving tanks are full with unprocessed waste and two full with processed wastewater => (2 x 21,000 gallons = 42,000 gallons for each waste stream). Liquid will be hauled to a liquid processing or compost facility or landfill for disposal at \$0.15/gal based on transporter quote.
4. Assume dewatering processing units are 80% full with processed waste (fill ports prevent further filling). Disposal cost is \$787 at Amarillo landfill and haul is \$243/rolloff container = \$1030
5. Assume the polymer and lime tanks are full (1000 + 3000 gallons = 4,000 gallons) and hauled to a processing facility for use or disposal at \$0.15/gal per processor quote.
6. Concrete & other built structures, after decon, will be abandoned in place.
7. Classification Sampling includes: (solids) SVOC's, VOC's, FOG, RCRA8 metals and TPH Tests; Same for Liquids plus FOG, BOD, and TSS. Unit costs are from a commercial lab rate sheet.
8. The unit transportation and disposal costs are representative of the cost to contract an outside disposal company to remove the tank contents and transport them for disposal/recycling to at facility licensed for disposal of this kind of waste.

**CLOSURE COST ESTIMATE
HIGH PLAINS WASTE WATER DISPOSAL FACILITY
PHASE 2**



CLOSURE ELEMENT DESCRIPTION - PHASE 2

	Unit Measure	Unit Cost	Number of Units	Total Cost
A. State administration of site closure				
1. Observe site and review file to determine closure activities	Hour	\$100.00	16	\$ 1,600
2. Prepare bid documents and procure bids	Hour	\$100.00	20	2,000
3. Contract award and administration of contract	Hour	\$100.00	16	1,600
				<u>5,200</u>
			Subtotal Part A.	\$ 5,200
B. General cleanup of the site and process unit(s)				
1. Waste Sampling / testing / classification				
a. Classification Sampling (2 samples)				
- Liquids (1 Composite Sample)	Composite Sample	\$800.00	1	\$ 800
- Solids (1 Composite Sample)	Sample	\$500.00	1	500
b. Sampler Costs	Hour	\$100.00	2	200
c. Sampling supplies /travel / per diem	Lump Sum	\$200.00	1	200
2. Transport and/or disposal of waste at a properly authorized facility				
a. Unprocessed waste and process tank - 2 @21 Kgal	gallon	\$0.15	42,000	6,300
b. Grit and Processed solids (transport and disposal at a landfill)	Rolloff Process Unit (each)	\$1,030.00	4	4,120
c. Waste water effluent holding tanks - 2 @21 Kgal	gallon	\$0.05	42,000	2,100
d. Washdown water (to city wastewater plant)	gallon	\$0.05	10,000	500
e. Preparation of disposal paperwork	Hour	\$100.00	3	300
f. Lime and polymer tanks	gallon	\$0.15	4,000	600
3. General cleanup (labor and supplies for washdown, disinfection, decontamination of concrete and units, disconnecting and storage of equipment)				
	Hour	\$100.00	16	1,600
4. Vector control procedures				
	Lump sum/month	\$300.00	1	<u>300</u>
				Subtotal Part B.
				\$ 17,610
C. Completion of cleanup				
1. Sign installation, securing buildings and access	Lump Sum	\$1,000.00	1	1,000
2. Perform site inspection and prepare certification of work completion	Hour	\$150.00	16	<u>2,400</u>
				Subtotal Part C.
				\$ 3,400
D. Contingency cost				
		15% of A.-C. Total		<u>\$ 3,932</u>
				CLOSURE COST TOTAL (2023 dollars)
				\$ 30,142

ASSUMPTIONS:

- All costs reflect the work being performed by an independent third party contractor, administered by TCEQ.
- No waste material will be accepted after the closure filing date.
- Assume two waste receiving tanks are full with unprocessed waste and two full with processed wastewater => (2 x 21,000 gallons = 42,000 gallons for each waste stream). Liquid will be hauled to a liquid processing or compost facility or landfill for disposal at \$0.15/gal based on transporter quote.
- Assume dewatering processing units are 80% full with processed waste (fill ports prevent further filling). Disposal cost is \$787 at Amarillo landfill and haul is \$243/rolloff container = \$1030
- Assume the polymer and lime tanks are full (1000 + 3000 gallons = 4,000 gallons) and hauled to a processing facility for use or disposal at \$0.15/gal per processor quote.
- Concrete & other built structures, after decon, will be abandoned in place.
- Classification Sampling includes: (solids) SVOC's, VOC's, FOG, RCRA6 metals and TPH Tests, Same for Liquids plus FOG, BOD, and TSS. Unit costs are from a commercial lab rate sheet.
- The unit transportation and disposal costs are representative of the cost to contract an outside disposal company to remove the tank contents and transport them for disposal/recycling to a facility licensed for disposal of this kind of waste.

Daphne Morcom

From: donotreply@tceq.texas.gov
Sent: Monday, December 18, 2023 11:33 AM
To: Daphne Morcom
Subject: TCEQ Confirmation: Your public comment on Permit Number 2418 was received.

REGULATED ENTITY NAME HIGH PLAINS WASTE WATER DISPOSAL

RN NUMBER: RN111713095

PERMIT NUMBER: 2418

DOCKET NUMBER:

COUNTY: RANDALL

PRINCIPAL NAME: HIGH PLAINS WASTE WATER DISPOSAL LLC

CN NUMBER: CN606126878

NAME: Daphne Morcom

EMAIL: dmorcom@thepnc.org

COMPANY: Panhandle Regional Planning Commission

ADDRESS: PO BOX 9257
AMARILLO TX 79105-9257

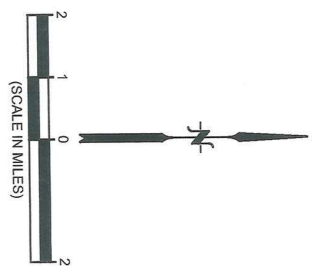
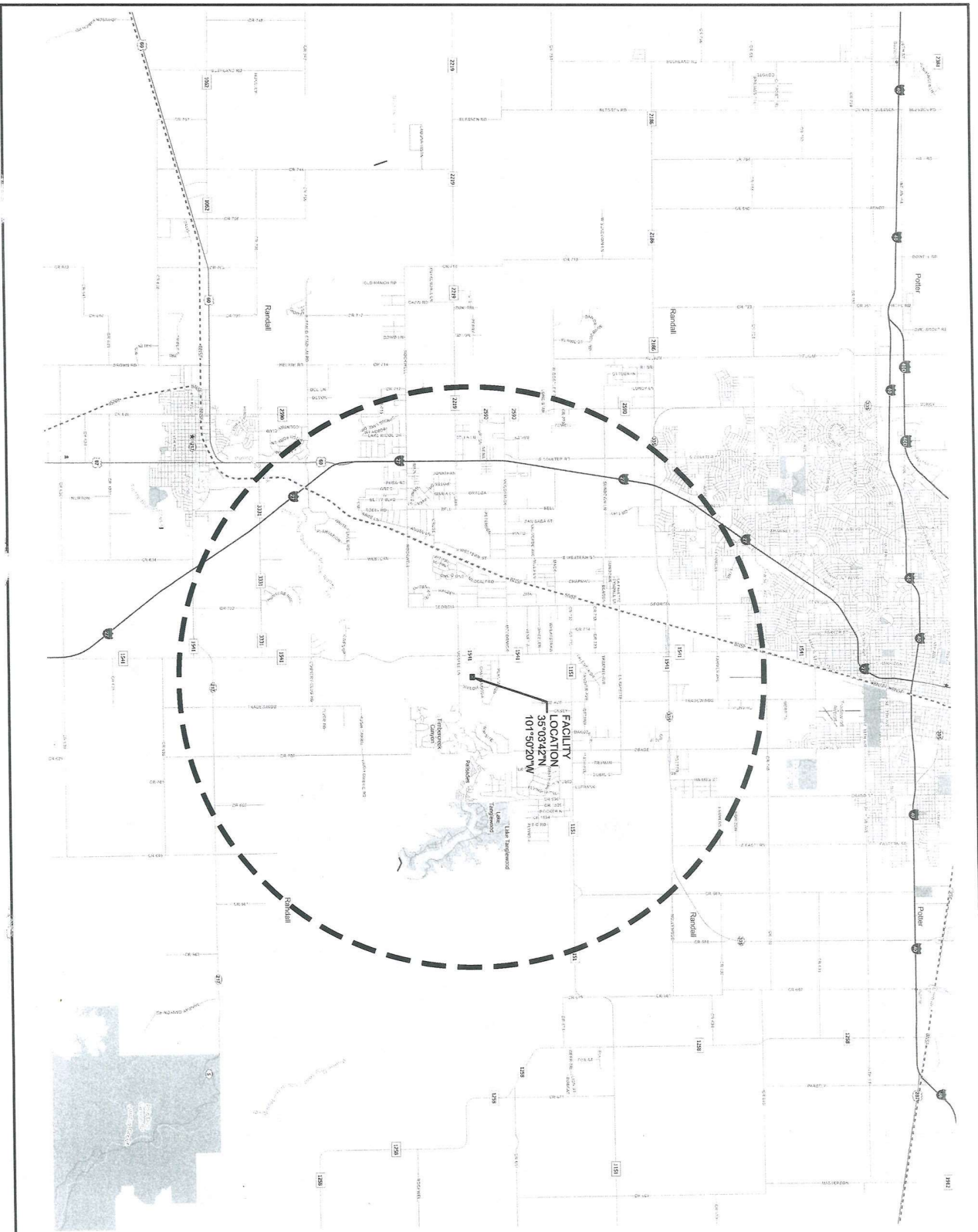
PHONE: 8063723381

FAX:

COMMENTS: At their meeting on 12/13/2023, the Panhandle Regional Solid Waste Management Advisory Committee (RSWMAC) reviewed the High Plains Waste Water Disposal's Type V-GG Processing Facility Permit application. The facility's goal is to recycle and/or reuse all treated waste water that is brought into the facility. Mr. Jerry Andersen, Professional Geologist and chief contact person for this project, was present to explain the facility's plans and to respond to the RSWMAC's specific questions regarding the technical and operational aspects of the proposal. Having reviewed the proposal in light of the stated goals and objectives of the Panhandle Regional Solid Waste Management Plan, the RSWMAC voted unanimously to support the facility's permit application. The RSWMAC found that the facility's plans are in conformance with the Solid Waste Plan's recommendations and will help achieve one of the primary goals of that plan which is "Develop programs that lead to waste minimization through local source reduction, recycling and composting, which conserve disposal capacity." The Panhandle Regional Solid Waste Management Advisory Committee recommends that the Texas Commission on Environmental Quality favorably consider the High Plains Waste Water Disposal Facility's request for permit for their municipal solid waste landfill facility.

Based on TCEQ rule Section 1.10(h), the TCEQ General Counsel has waived the filing requirements of Section 1.10(c) to allow the filing of comments, requests, or withdrawals using this online system. The General Counsel

also has waived the requirements of Section 1.10(e) so that the time of filing your electronic comments or requests is the time this online system receives your comments or requests. Comments or requests are considered timely if received by 5:00 p.m. CST on the due date.



LEGEND
 - - - - - 6 MILE RADIUS



BASE MAP SOURCE:
 TEXAS DEPARTMENT OF
 TRANSPORTATION (TXDOT)
 COPYRIGHT 2018
 DISTRICT: AMARILLO
 COUNTY: RANDALL

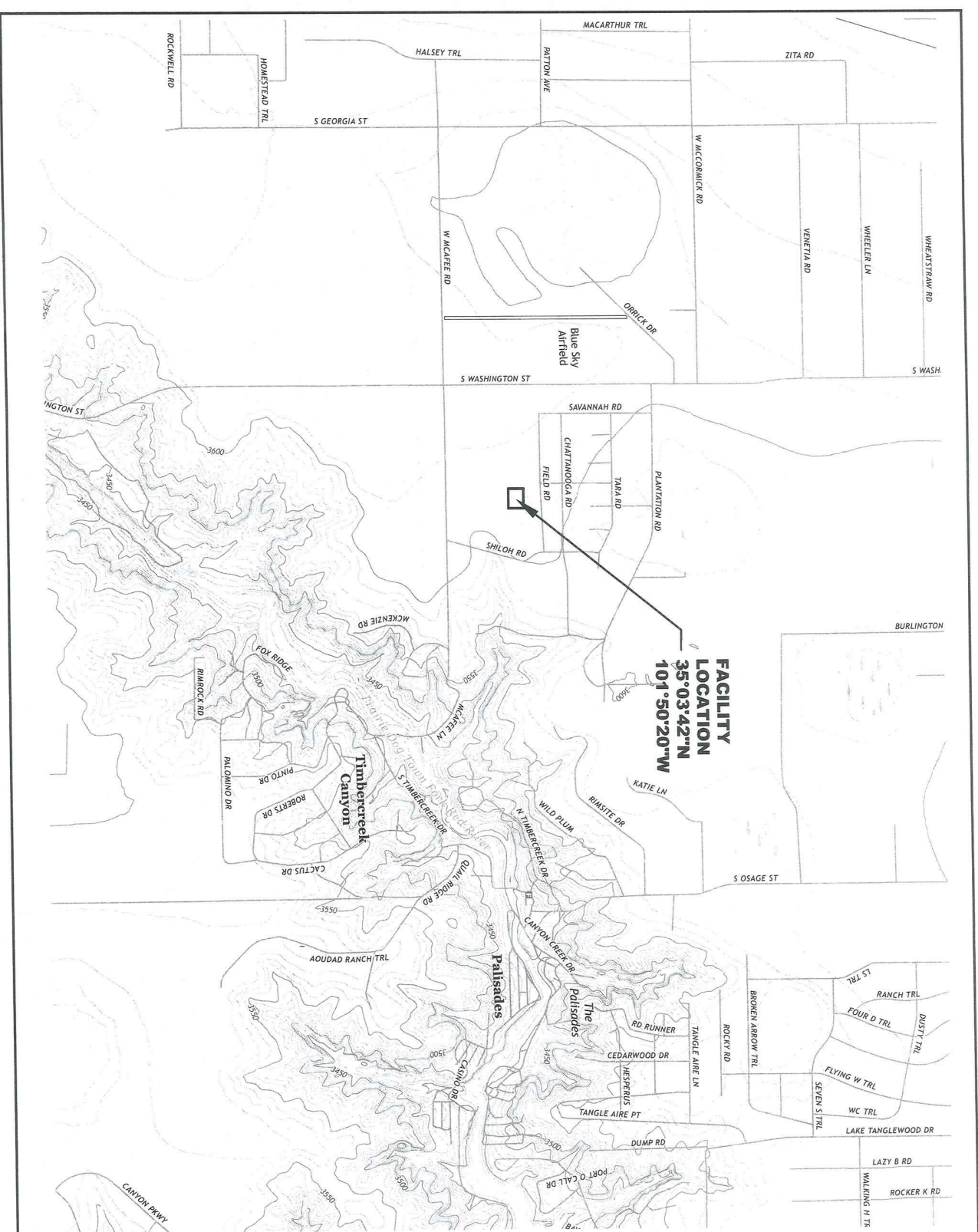
REV.	DATE	DESCRIPTION	DR BY	APP BY
1	8/23/22	UPDATED BASE MAP SOURCE		

PROJECT:
 HIGH PLAINS WASTE WATER DISPOSAL
 RANDALL COUNTY, TX

DESIGNER:
B BRIAN DUDLEY ENGINEERING
 Texas Registered Engineering Firm #15857
 Austin, Texas 019719294

SHEET TITLE:
 GENERAL MAP

DES BY	SOB	SCALE	SEE BASE SCALE
DR BY	JBD	PROJ. NO.	60181
CHK BY	JBD	DATE ISSUED	03/31/2023
APP BY	JBD	FIGURE NO.	1
PURPOSE: PERMIT APPLICATION			1



**FACILITY
LOCATION**
35°03'42"N
101°50'20"W



BASE MAP SOURCE:
<https://store.usgs.gov>
 U.S.G.S 7.5 MIN. TOPOGRAPHIC
 THE PALISADES QUADRANGLE, 2019

REV.	DATE	DESCRIPTION	DR BY	APP BY

B BRIAN DUDLEY ENGINEERING
 Texas Registered Engineering Firm No. 15857
 Address: 1001 W. 19th St., Suite 200
 Fort Worth, Texas 76102

PROJECT:	
HIGH PLAINS WASTE WATER DISPOSAL	
RANDALL COUNTY, TX	
SHEET TITLE:	
TOPOGRAPHIC SITE LOCATION MAP	
DESIGNER	SCALE
DRB BY: SDB	SEE BASE SCALE
DATE: 02/20/2023	
APP BY: JBD	DWG NO. 002
DATE ISSUED: 02/21/2023	SHEET 1 OF 1 SHEETS
PURPOSE: PERMIT APPLICATION	FIGURE NO. 2



- LEGEND**
- 1 MILE RADIUS
 - 500 FT RADIUS
 - WATER WELL
 - AG AGRICULTURE
 - C CHURCH
 - COM COMMERCIAL
 - R RESIDENTIAL



NOTE: THE OWNERS HOUSE IMMEDIATELY NORTH OF THE SITE IS THE ONLY HABITABLE STRUCTURE WITHIN 500 FT.

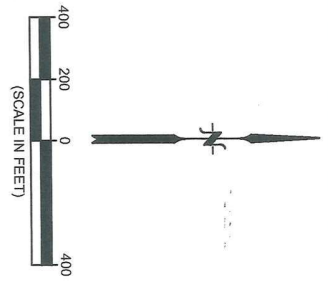
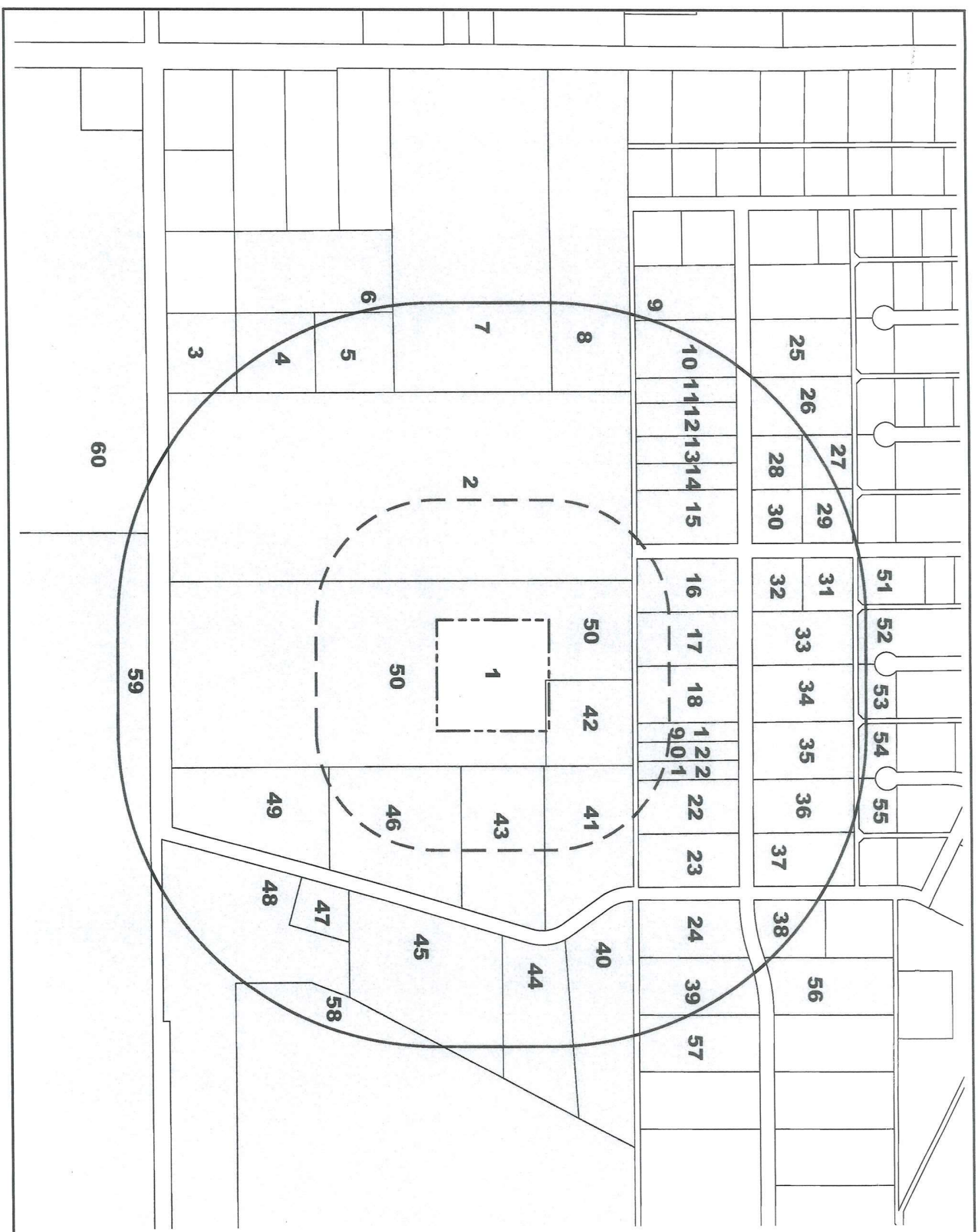
BASE MAP SOURCE:
<https://store.usgs.gov>
 U.S.G.S 7.5 MIN. TOPOGRAPHIC
 THE PALISADES QUADRANGLE: 2019

REV.	DATE	DESCRIPTION	DR BY	APP BY
1	9/23/23	ADDED NOTE AND TEXT		

B BRIAN DUDLEY ENGINEERING
 Texas Registered Professional Engineer License No. 58579
 Austin, Texas 78701-1725

PROJECT:
 HIGH PLAINS WASTE WATER DISPOSAL
 RANDALL COUNTY, TX

SHEET TITLE:		SCALE: SEE BAR SCALE	
DES BY	598	PROJ NO.	
CHK BY	598	DWG NO.	000
APP BY	598	SHEET 1 OF 1 SHEETS	
DATE PUBLISHED	03/31/2023	FIGURE NO.	3
PURPOSE: PERMIT APPLICATION			



- LEGEND**
- SITE BOUNDARY
 - 1/4 MILE RADIUS
 - 500 FT RADIUS
 - PARCEL WITHIN 1/4 MILE



BASE MAP SOURCE:
<https://tms.gov/stratmap/parcel>
 Dated 01-07-2022

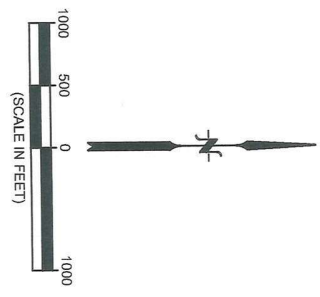
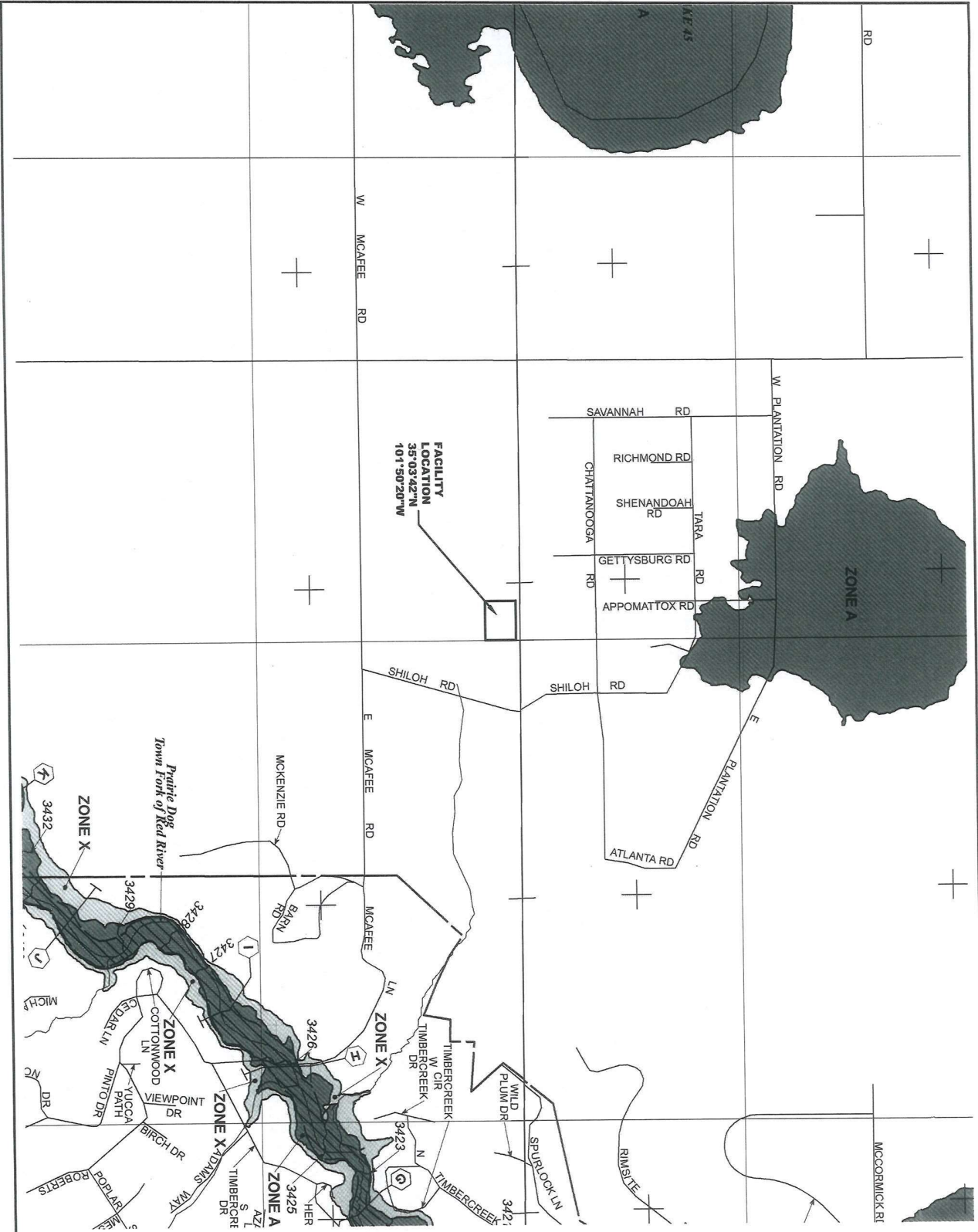
REV.	DATE	DESCRIPTION	DR BY	APP BY
1	02/23	REVISED LEGEND		

B BRIAN DUDLEY ENGINEERING
 Texas Registered Engineering Firm, F-15457
 Austin, Texas (512) 771-5324

PROJECT:
 HIGH PLAINS WASTE WATER DISPOSAL
 RANDALL COUNTY, TX

SHEET TITLE:
 LANDOWNERS WITHIN 1/4 MILE

DES BY	SCALE	SEE BARS SCALE
JBD	AS SHOWN	
CHK BY	JBD	
DATE ISSUED	03/31/2023	
PURPOSE	PERMIT APPLICATION	
SHEET NO.	4	



LEGEND

SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE

100 YEAR FLOOD - Areas shown in this legend are the 100 year flood areas as determined by the Federal Emergency Management Agency (FEMA) and the National Flood Insurance Program (NFIP). The 100 year flood areas are shown in this legend as a shaded area. The 100 year flood areas are shown in this legend as a shaded area. The 100 year flood areas are shown in this legend as a shaded area.

100 YEAR FLOOD - Areas shown in this legend are the 100 year flood areas as determined by the Federal Emergency Management Agency (FEMA) and the National Flood Insurance Program (NFIP). The 100 year flood areas are shown in this legend as a shaded area. The 100 year flood areas are shown in this legend as a shaded area. The 100 year flood areas are shown in this legend as a shaded area.

OTHER FLOOD AREAS

1. BRIAN DUDLEY
59831
PROFESSIONAL ENGINEER
LIBERSED

BASE MAP SOURCE:
FLOOD INSURANCE RATE MAP (FIRM)
RANDALL COUNTY
PANELS 48381C0230E, 48381C0240E
JUNE 4, 2010

DES BY	SRB	SCALE	SEE PLAN SCALE
CHK BY	JBD	FIG NO.	0681
APP BY	JBD	SHEET	1 OF 1 SHEETS
DATE ISSUED	05/31/2023	FIGURE NO.	5
PURPOSE: PERMITS APPLICATION			

SHEET TITLE:
FLOOD PLAIN MAP

PROJECT:
HIGH PLAINS WASTE WATER DISPOSAL
RANDALL COUNTY, TX

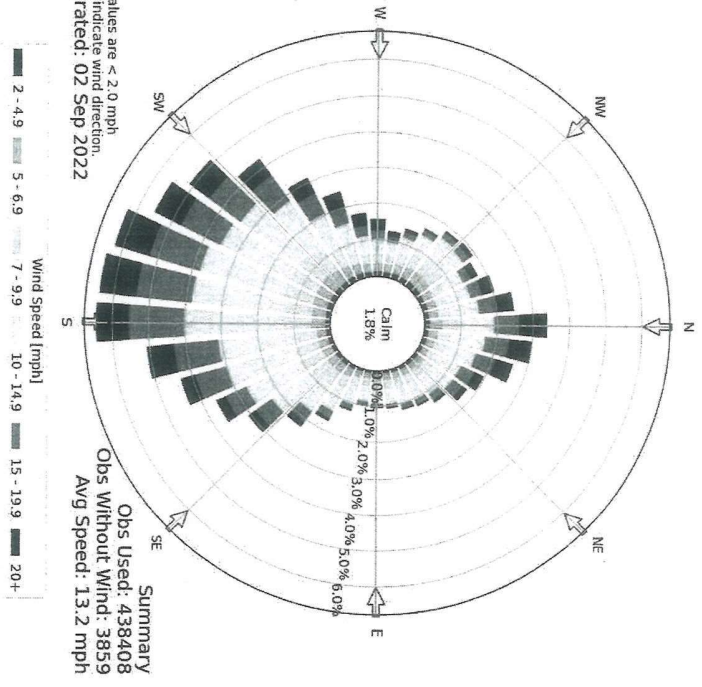
BRIAN DUDLEY ENGINEERING
 Texas Registered Engineering Firm F-1567
 Austin, Texas 01913926



8/27/23



Windrose Plot for [LWMA] AMARILLO ARPT(AWOS)
 Obs Between: 01 Jan 1970 03:00 AM - 01 Sep 2022 06:53 PM America/Chicago



Calm values are < 2.0 mph
 Arrows indicate wind direction.
 Generated: 02 Sep 2022



REV	DATE	DESCRIPTION	DR BY	APP BY

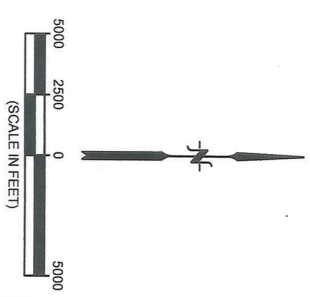
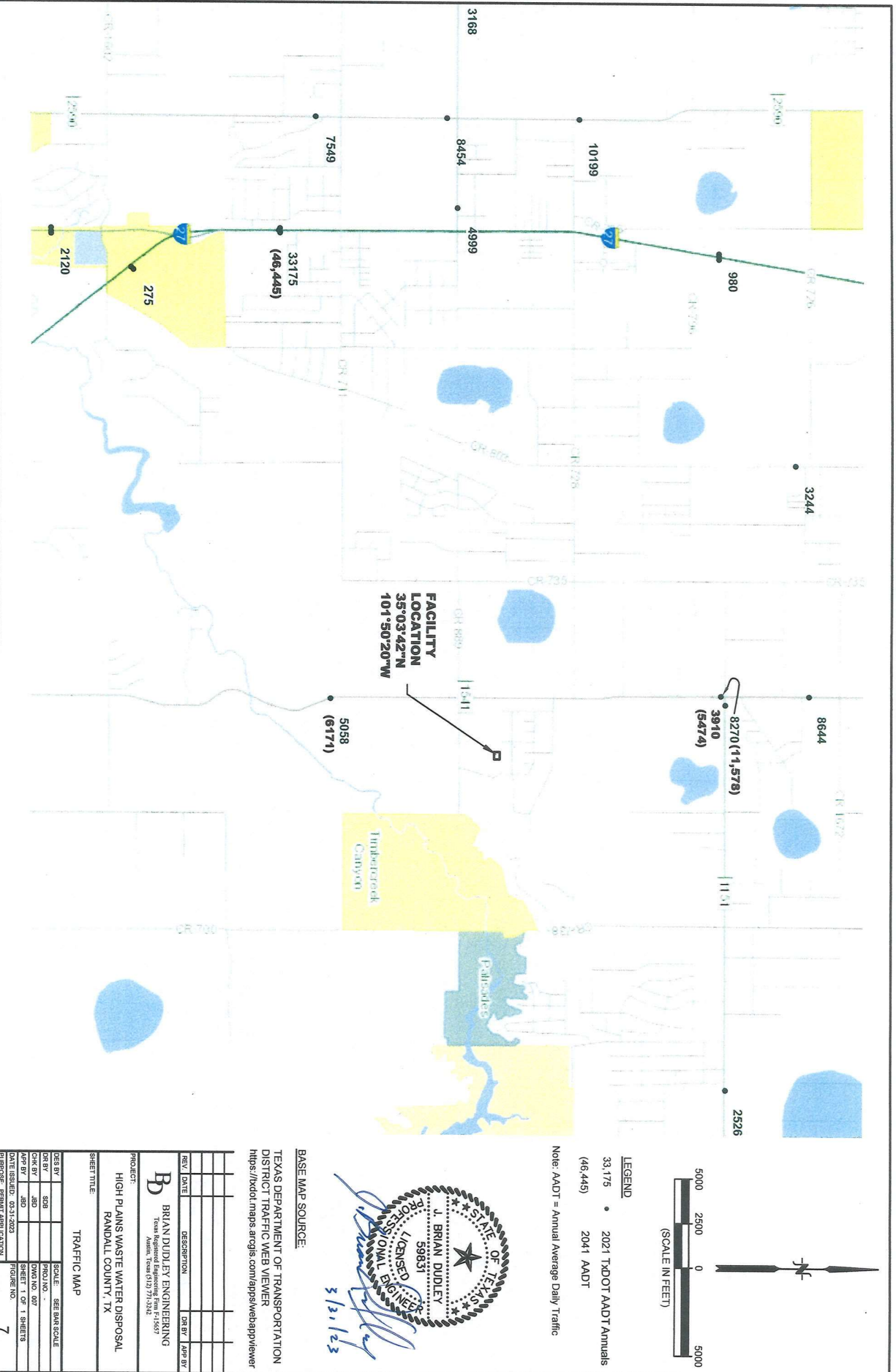
B
BRIAN DUDLEY ENGINEERING
 Texas Registered Engineering Firm #14617
 Austin, Texas (512) 775-2942

PROJECT:
 HIGH PLAINS WASTE WATER DISPOSAL
 RANDALL COUNTY, TX

SHEET TITLE:
 WIND ROSE PLOT

DES BY	SCALE	REV	BAR SCALE
DR BY	SDB	PROJ NO. -	
CHK BY	JBD	DWG NO. 008	
APP BY	JBD	SHEET 1 OF 1 SHEETS	
DATE ISSUED	03/31/2023	FIGURE NO.	6

PURPOSE: PERMIT APPLICATION



LEGEND

- 2021 TxDOT AADT Annuals
- 33,175 2041 AADT
- (46,445)

Note: AADT = Annual Average Daily Traffic



BASE MAP SOURCE:

TEXAS DEPARTMENT OF TRANSPORTATION
DISTRICT TRAFFIC WEB VIEWER
<https://txdot.maps.arcgis.com/apps/webappviewer>

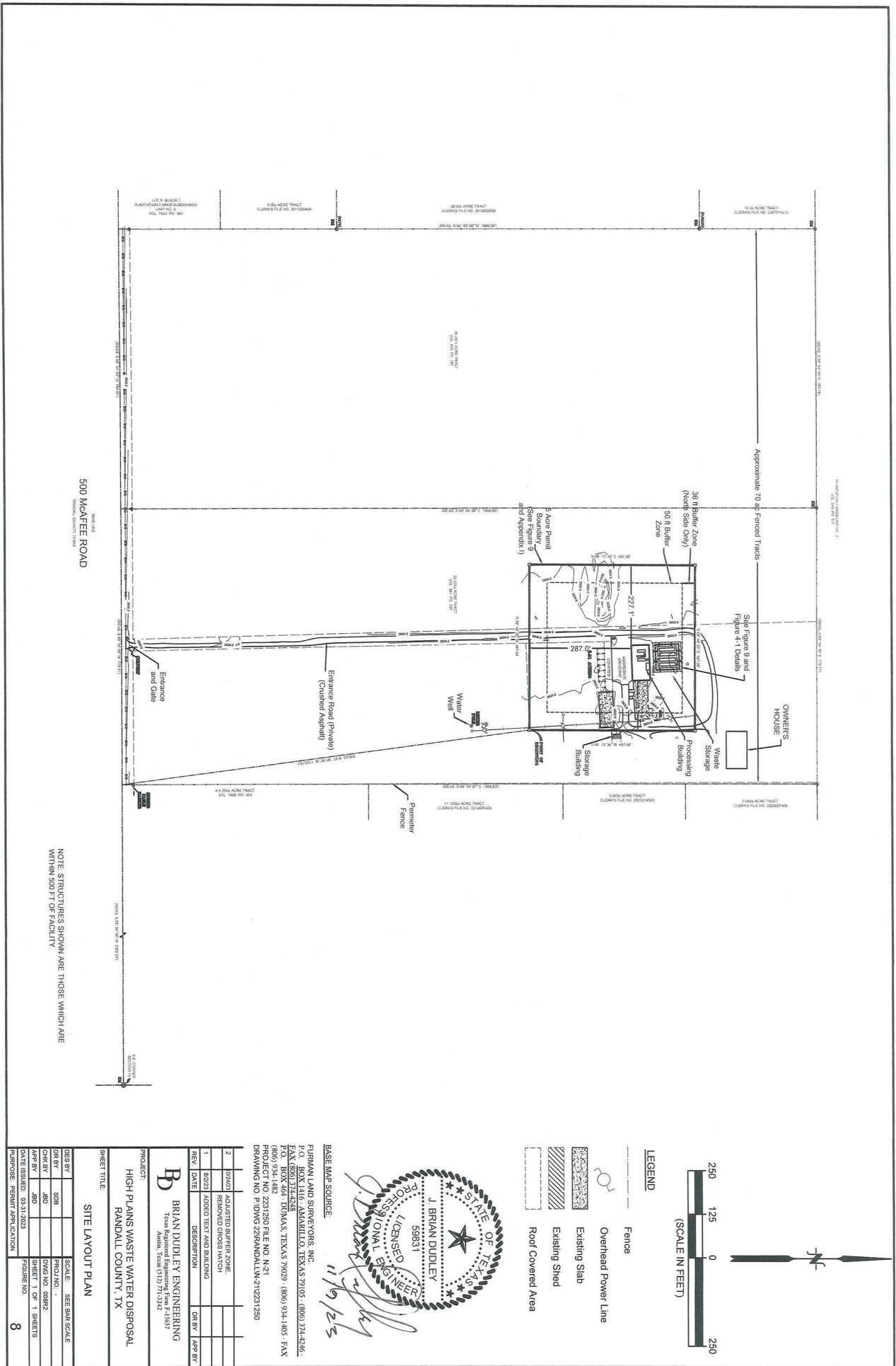
REV	DATE	DESCRIPTION	DR BY	APP BY

PROJECT:
HIGH PLAINS WASTE WATER DISPOSAL
RANDALL COUNTY, TX

CLIENT:
BRIAN DUDLEY ENGINEERING
2600
Auburn, Texas (619) 773-2242

SHEET TITLE:
TRAFFIC MAP

DES BY	SCALE	SEE BAR SCALE
DR BY		
CHK BY		
APP BY		
DATE ISSUED	02/21/2023	
PURPOSE	PERMIT APPLICATION	
FIGURE NO.		7



NOTE: STRUCTURES SHOWN ARE THOSE WHICH ARE WITHIN 500 FT OF FACILITY.

REV	DATE	DESCRIPTION	DR BY	APP BY
2	10/20/12	ADJUSTED BUFFER ZONE		
1	02/23/12	ADDED TEXT AND BUILDING		

B BRIAN DUDLEY ENGINEERING	
Texas Professional Engineering Firm - 15657	
Address: 1001 W. 19th Street, Suite 100, Amarillo, TX 79102	

DESIGN BY	SRB	SCALE	SEE DRAWING SCALE
CHECK BY	JBD	PROJECT NO.	008822
DATE ISSUED	03/31/2012	SHEET 1 OF 1 SHEETS	
PURPOSE	PERMIT APPLICATION	FIGURE NO.	8

BASE MAP SOURCE:
 FURMAN LAND SURVEYORS, INC.
 P.O. BOX 1416 - AMARILLO, TEXAS 79105 - (806) 374-4246.
 P.O. BOX 1416 - AMARILLO, TEXAS 79105 - (806) 374-4246.
 P.O. BOX 1464 - Dumas, Texas 79029 - (806) 934-1405 FAX
 (806) 934-1482
 PROJECT NO. 2231250 FILE NO. N-21
 DRAWING NO. PUDWG ZRRANDALLN-212231250



LEGEND

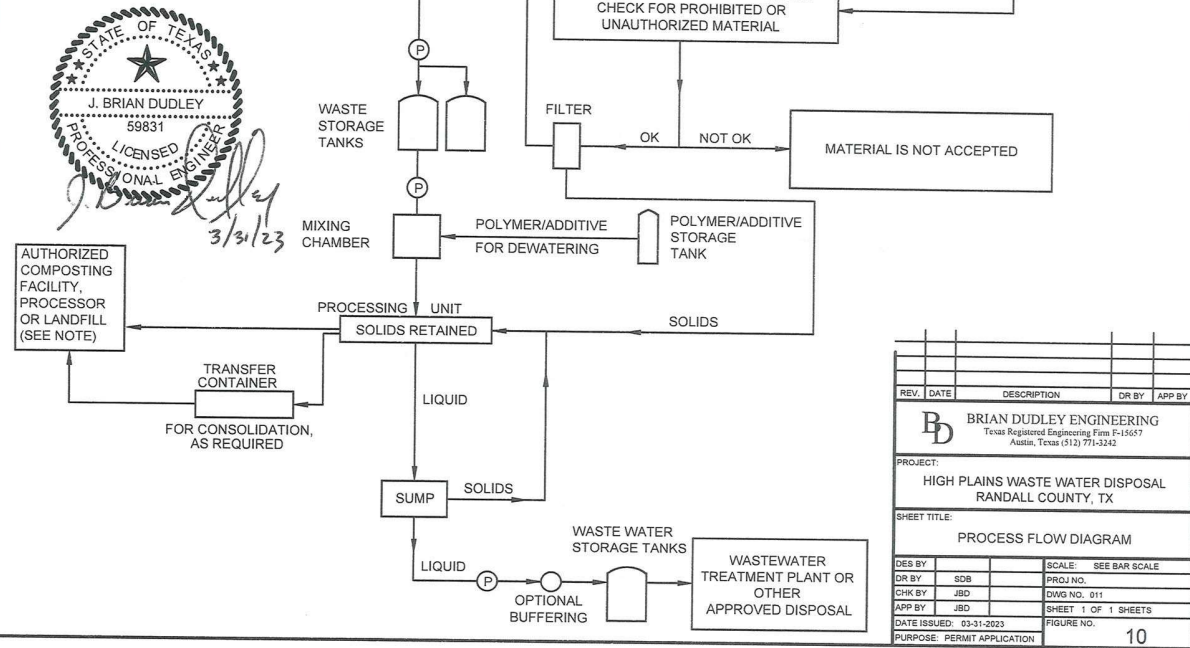
- Fence
- Overhead Power Line
- Existing Slab
- Existing Shed
- Roof Covered Area

Scale: 0 to 250 feet (SCALE IN FEET)

NOTE: IF SOLIDS WILL BE COMPOSTED, GRIT TRAP WASTE WILL EITHER BE HANDLED SEPARATELY FROM OTHER WASTES, OR IT WILL BE TRACKED THROUGH THE PROCESS SO THAT ANY MATERIAL RECOVERED CONTAINING ANY GRIT TRAP SOLIDS OR LIQUIDS WILL NOT BE TRANSPORTED TO A COMPOST FACILITY.

(P) DENOTES PUMP

LIQUID WASTE DELIVERY BY TRUCK



REV.	DATE	DESCRIPTION	DR BY	APP BY

BRIAN DUDLEY ENGINEERING
Texas Registered Engineering Firm F-15657
Austin, Texas (512) 771-3242

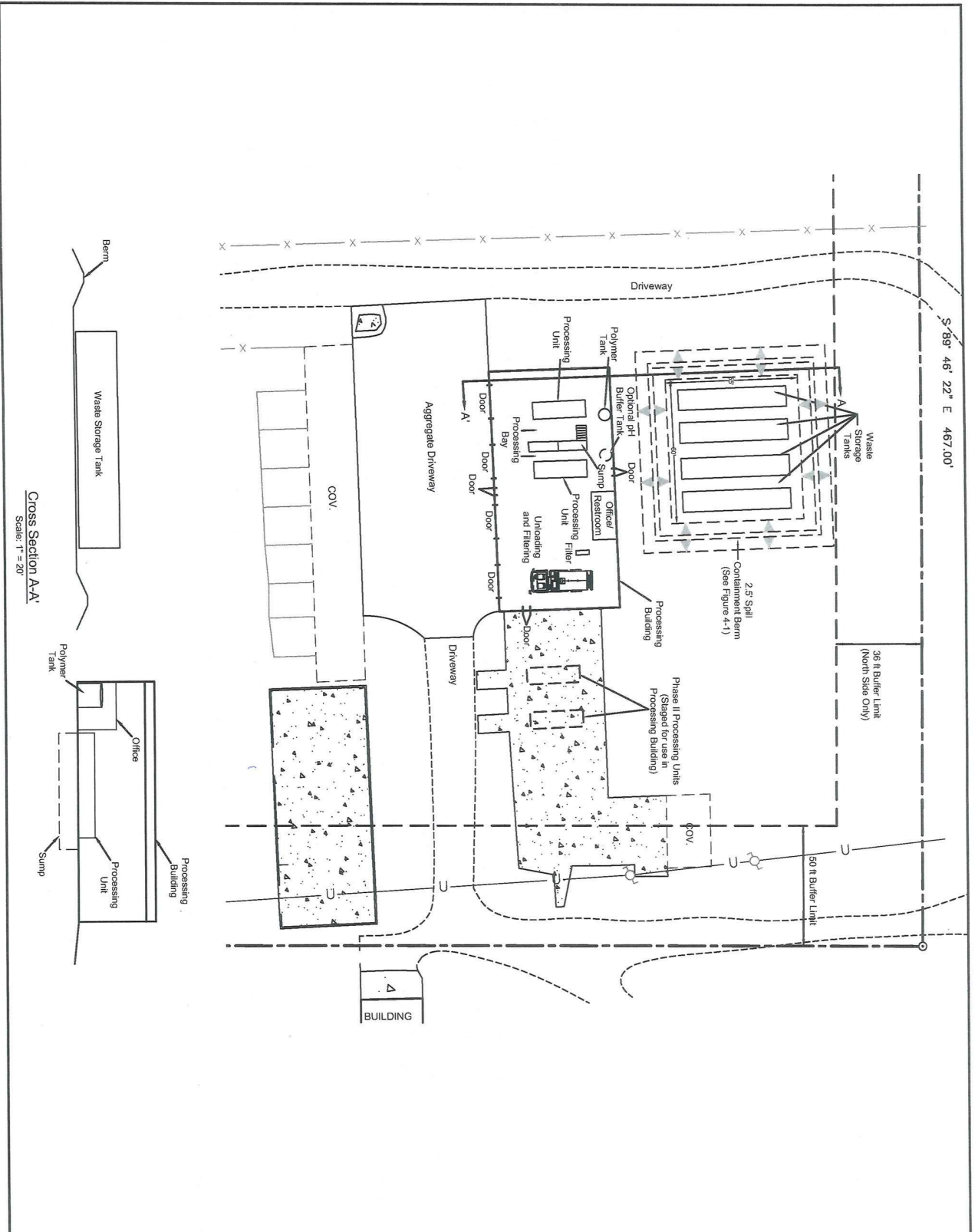
PROJECT:
HIGH PLAINS WASTE WATER DISPOSAL
RANDALL COUNTY, TX

SHEET TITLE:
PROCESS FLOW DIAGRAM

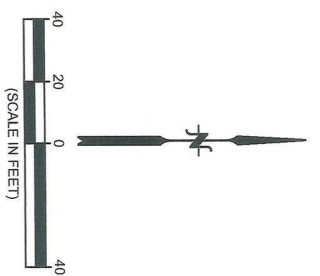
DES BY	SOB	SCALE	SEE BAR SCALE
DR BY		PROJ NO.	
CHK BY	JBD	DWG NO.	011
APP BY	JBD	SHEET	1 OF 1 SHEETS
DATE ISSUED:	03-31-2023	FIGURE NO.	
PURPOSE:	PERMIT APPLICATION		

10

S 89° 46' 22" E 467.00'



Cross Section A-A'
Scale: 1" = 20'



- LEGEND**
- EXISTING SLAB
 - EXISTING ROOF AREA
 - COV
 - PERMIT BOUNDARY



BASE MAP SOURCE:
EUPHRATI LAND SURVEYORS, INC.
P.O. BOX 1416, AMARILLO, TEXAS 79105 - (806) 374-4346
FAX (806) 374-4348
P.O. BOX 464 - DINAS, TEXAS 79029 - (806) 934-1405 - FAX
(806) 934-1402
P.O. BOX 222222 - DALLAS, TEXAS 75222 - (214) 222-1200
DRAWING NO. P-010622-RANDALL-LIN-2102231290

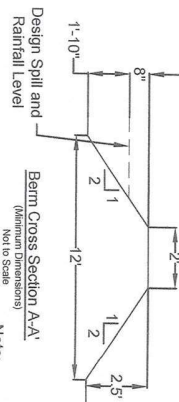
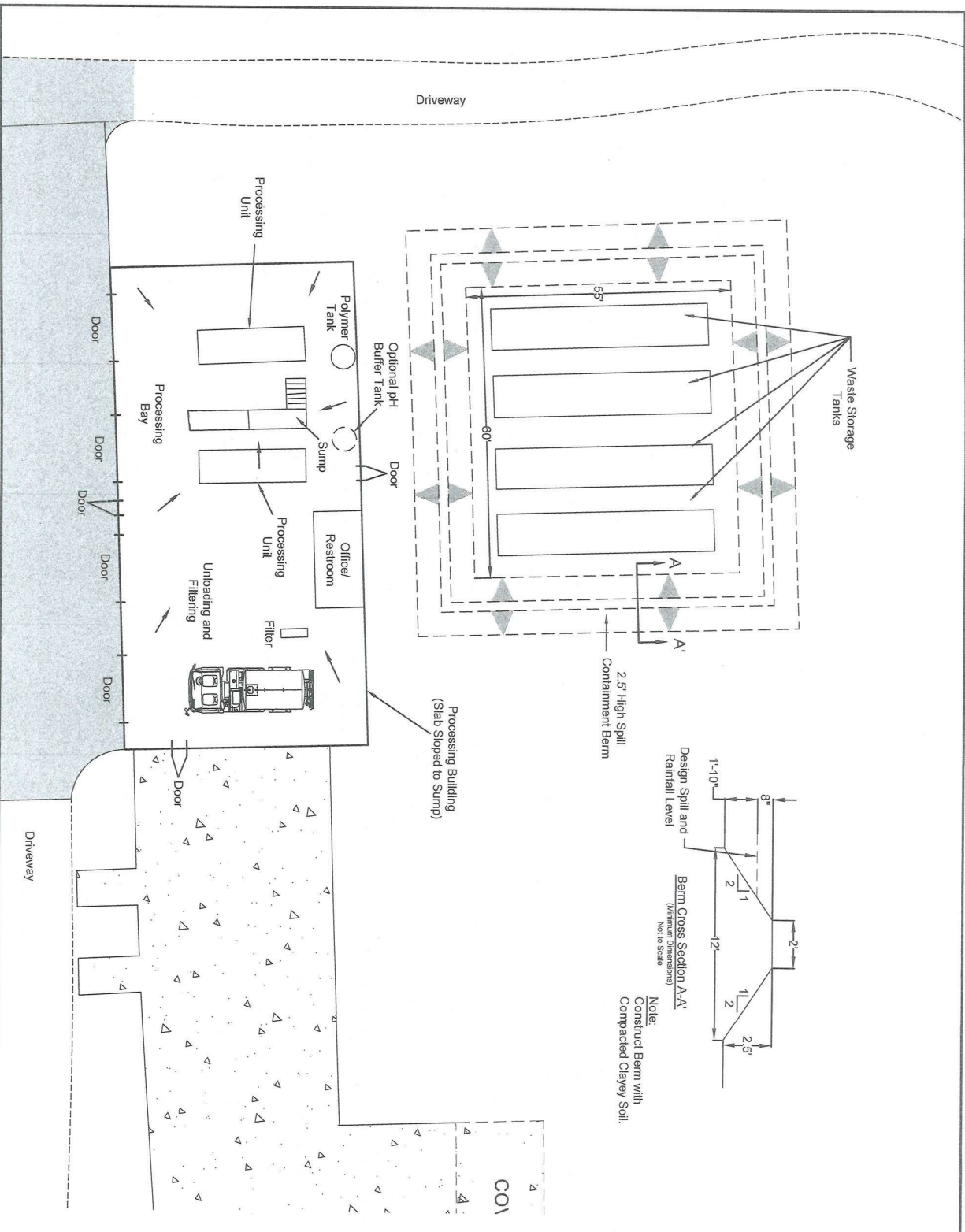
REV.	DATE	DESCRIPTION	DR BY	APP BY
1	02/23	ADDED 50 FT BUFFER LIMIT		
2	02/24	ADDED POLYMER TANK AND LABEL BUFFER ZONE		
3	02/24	ADDED PROCESSING UNITS AND LABEL BUFFER ZONE		

B BRIAN DUDLEY ENGINEERING
Texas Registered Engineering Firm E-15657
Austin, Texas (512) 711-5242

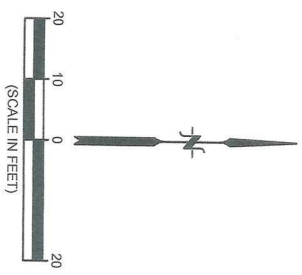
PROJECT: HIGH PLAINS WASTE WATER DISPOSAL
RANDALL COUNTY, TX

SHEET TITLE: LAYOUT DETAIL

DES BY	SCALE	PROJ NO.
JBD	SEE BARE SCALE	
CHK BY	DWG NO.	SHEET NO.
JBD	0699	1 OF 1 SHEETS
DATE ISSUED	PROJECT NO.	PURPOSE
03/31/2023		PERMIT APPLICATION



Note:
Construct Berm with
Compacted Clayey Soil.



- LEGEND
- EXISTING SLAB
 - EXISTING ROOF AREA
 - SLAB SLOPE



BASE MAP SOURCE:
FURMAN LAND SURVEYORS, INC.
P.O. BOX 1416, AMARILLO, TEXAS 79105 - (806) 374-4246.
FAX: (806) 374-2428
1400 W. 10TH ST., DALLAS, TEXAS 75209 - (800) 934-1405 - FAX
(806) 934-1482
PROJECT NO. 2291260 FILE NO. N-21
DRAWING NO. P10VG 2296ANDALLN-210231250

REV.	DATE	DESCRIPTION	DR BY	APP BY
B		BRIAN DUDLEY ENGINEERING 2291260 Amarillo, Texas 79109		

SHEET TITLE	
HIGH PLAINS WASTE WATER DISPOSAL RANDALL COUNTY, TX	

SPILL CONTAINMENT FEATURES	
CDS BY	SCALE: SEE BAR SCALE
DR BY	PROJ. NO. -
CHK BY	DWG. NO. 010
APP BY	SHEET 1 OF 1 SHEETS
DATE ISSUED: 03-31-2023	FIGURE NO.
PURPOSE: PRELIM PARTICIPATION	4-1