



Tall Pines Landfill  
MSW no. 2304

**PERMIT MODIFICATION REQUEST-  
RESPONSE TO ADDITIONAL  
INFORMATION REQUEST REGARDING  
NOTICE OF DEFICIENCY**

**SITE ENTRANCE LOCATIONS**

Presented to:

**Waste Corporation of Texas, L.P.**

1330 Post Oak Blvd, Floor 30  
Houston, Texas 77056  
(713) 292-2400

Presented by:

**SCS ENGINEERS**

Texas Board of Professional Engineers Registration No. F-3407  
12651 Briar Forest, Suite 205  
Houston, Texas 77077  
(281) 397-6747

January 12, 2015  
File No. 16213023.06

Offices Nationwide  
[www.scsengineers.com](http://www.scsengineers.com)

## SCS ENGINEERS

January 12, 2015

Greg Charles, P.E.  
Project Manager  
MC-124  
Municipal Solid Waste Permits Section  
Waste Permits Division  
Texas Commission on Environmental Quality  
12100 Park 35 Circle  
Austin, Texas 78753

Subject: Tall Pines Disposal Facility – Harris County  
Municipal Solid Waste (MSW) – Permit No. 2304  
Permit Modification – Site Entrance Locations  
Response to Additional Information Request Regarding Notice of Deficiency  
(NOD)  
Tracking No. 18473855; RN103375879/CN601300221

Dear Mr. Charles:

On behalf of the Waste Corporation of Texas, L.P. (WCA), SCS Engineers (SCS) is pleased to submit this response to your request for additional information in addressing the October 8, 2014 letter regarding deficiencies in the permit modification request to permit MSW – 2304 for the Tall Pines Disposal Facility in Harris County, Texas.

SCS has revised Parts I and II, Section 2.3.1, Site Access to add the sentence:

*“The owner or operator will obtain required permits from appropriate governmental agencies prior to construction of any new driveway entrances.”*

The following items are being submitted with this response:

**Revisions include the following:**

Section	Title	Description
TCEQ Form 20650	Permit/Registration Modification and Temporary Authorization Application for an MSW Facility	Completed form to reflect Permit Modification NOD response with signatory authority attached.
Revision of Parts I/II		Revised Cover Sheet, Table of Contents, Section 2.3.1, to add the above referenced sentence.



Mr. Greg Charles, P.E.  
January 12, 2015

The certification statement required by 30 TAC §305.44 is included as part of the enclosed TCEQ Permit/Registration Modification and Temporary Authorization Application for an MSW Facility form.

As required by 30 TAC §330.125(c) of the TCEQ rules, please be advised that this letter with enclosures is being placed in the operating record for the subject facility in accordance with the requirements of 30 TAC §330.125(a) and/or (b). Also as required, an original, two unmarked copies, and one marked (redline/strikeout) copy of the permit modification are being submitted. An additional copy is being submitted directly to the TCEQ Region 12 Office, to the attention of the Waste Section Manager.

I trust that this submittal is complete and will lead towards approval of this permit modification request. If you have any questions or comments concerning this submittal, please contact either of us at (281) 397-6747.

Sincerely,



J. Roy Murray, P.E.  
Vice President  
**SCS ENGINEERS**



Ryan Derong, P.E.  
Project Engineer  
**SCS ENGINEERS**

Enclosures

cc: Marcos Elizondo, WCA  
Jason Ybarra, TCEQ Region 12

Facility Name: Tall Pines Disposal Facility  
Permittee/Registrant Name: Waste Corporation of Texas, L.P.  
MSW Authorization #: 2304  
Initial Submittal Date: August 7, 2014  
Revision Date: 01/12/2015



## Texas Commission on Environmental Quality

### Permit/Registration Modification and Temporary Authorization Application Form for an MSW Facility

#### 1. Reason for Submittal

- ☐ Initial Submittal      ☒ Notice of Deficiency (NOD) Response

#### 2. Authorization Type

- ☒ Permit      ☐ Registration

#### 3. Application Type

- ☒ Modification with Public Notice      ☐ Modification without Public Notice  
☐ Temporary Authorization (TA)      ☐ Modification for Name Change/Transfer

#### 4. Application Fees

- ☐ Pay by Check      ☒ Online Payment

If paid online, e-Pay Confirmation Number: **582EA000172315**

#### 5. Application URL

Is the application submitted for a permit/registration modification with public notice?

- ☒ Yes      ☐ No

If the answer is "Yes", enter the URL address of a publicly accessible internet web site where the application and all revisions to that application will be posted in the space provided: [http://www.scsengineers.com/State\\_Info/index.html](http://www.scsengineers.com/State_Info/index.html)

#### 6. Confidential Documents

Does the application contain confidential documents?

- ☐ Yes      ☒ No

If "Yes", cross-reference the confidential documents throughout the application and submit as a separate attachment in a binder clearly marked "CONFIDENTIAL."

## 7. General Facility Information

Facility Name: **Tall Pines Disposal Facility**  
MSW Authorization No.: **2304**  
Regulated Entity Reference No.: **RN103375879**  
Physical or Street Address (if available): **18710 East Hardy Road**  
City: **Houston** County: **Harris** State: **TX** Zip Code: **77073**  
(Area code) Telephone Number: **(281) 443-2404**  
Latitude: **29.989783** Longitude: **95.385682**

## 8. Facility Type(s)

<input type="checkbox"/> Type I	<input checked="" type="checkbox"/> Type IV	<input type="checkbox"/> Type V
<input type="checkbox"/> Type I AE	<input type="checkbox"/> Type IV AE	<input type="checkbox"/> Type VI

## 9. Description of the Revisions to the Facility

Provide a brief description of all revisions to the permit/registration conditions and supporting documents referred by the permit/registration, and a reference to the specific provisions under which the modification/temporary authorization application is being made. Also, provide an explanation of why the modification/temporary authorization is requested: **This permit modification is to add three new alternatives for site entrance. This involves revising Parts 1 and 2; Part 3, Site Development Plan, including Attachment 1, Site Layout Plan, Attachment 6, Groundwater and Surface Water Protection and Drainage Plan, Attachment 7, Final Contour Map, Attachment 12, Final Closure Plan, Attachment 14, Landfill Gas Management Plan; and Part IV, Site Operating Plan. This permit modification is submitted in accordance with 30 TAC §305.70 (I) as a permit modification requiring public notice.**

**This permit modification is requested to give the facility the flexibility to change the entrance location to better serve the facility customers.**

This section is intentionally left blank; please continue to the next page.

## 10. Facility Contact Information

**Site Operator (Permittee/Registrant) Name:** Waste Corporation of Texas, L.P.

Customer Reference No. (if issued)\*: CN602528804

Mailing Address: 1330 Post Oak Blvd, Suite 30

City: Houston County: Harris State: TX Zip Code: 77056

(Area Code) Telephone Number: (713) 292-2400

Email Address: melizondo@wcamerica.com

TX Secretary of State (SOS) Filing Number: 0800108480

\*If the Site Operator (Permittee/Registrant) does not have this number, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Site Operator (Permittee/Registrant) as the Customer.

**Operator Name<sup>1</sup>:** Same as Site Operator (Permittee/Registrant)

Customer Reference No. (if issued)\*:

Mailing Address:

City: County: State: Zip Code:

(Area Code) Telephone Number:

Email Address:

Charter Number:

<sup>1</sup>If the Operator is the same as Site Operator/Permittee type "Same as "Site Operator (Permittee/Registrant)".

\*If the Operator does not have this number, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Operator as the customer.

**Consultant Name (if applicable):** SCS Engineers

Texas Board of Professional Engineers Firm Registration Number: F-3407

Mailing Address: 12651 Briar Forest Dr., Suite 205

City: Houston County: Harris State: TX Zip Code: 77077

(Area Code) Telephone Number: (281) 293-8494

E-Mail Address: JMurray@scsengineers.com

**Agent in Service Name (required only for out-of-state):**

Mailing Address:

City: County: State: Zip Code:

(Area Code) Telephone Number:

E-Mail Address:

**11. Ownership Status of the Facility**

Is this a modification that changes the legal description, the property owner, or the Site Operator (Permittee/Registrant)?

☐ Yes ☒ No

If the answer is "No", skip this section.

Does the Site Operator (Permittee/Registrant) own all the facility units and all the facility property?

☐ Yes ☐ No

If "No", provide the information requested below for any additional ownership.

**Owner Name:**

Street or P.O. Box:

City: County: State: Zip Code:

(Area Code) Telephone Number:

Email Address (optional):

Charter Number:

## Signature Page

I, Marcos Elizondo, Region Landfill Operations and Engineering,  
(Site Operator (Permittee/Registrant)'s Authorized Signatory) (Title)

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.

Signature: Marcos Elizondo

Date: 1/13/15

-----  
TO BE COMPLETED BY THE OPERATOR IF THE APPLICATION IS SIGNED BY AN AUTHORIZED REPRESENTATIVE FOR THE OPERATOR

I, \_\_\_\_\_, hereby designate \_\_\_\_\_  
(Print or Type Operator Name) (Print or Type Representative Name)

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.

\_\_\_\_\_  
Printed or Typed Name of Operator or Principal Executive Officer

\_\_\_\_\_  
Signature

-----  
SUBSCRIBED AND SWORN to before me by the said Marcos Elizondo

On this 13<sup>th</sup> day of JAN, 2015

My commission expires on the 20<sup>th</sup> day of Aug, 2016

Donna Gaston  
Notary Public in and for

Fort Bend County, Texas

(Note: Application Must Bear Signature & Seal of Notary Public)





## Permit/Registration Modification with Public Notice

(See Instructions for P.E. seal requirements.)

### Required Attachments

### Attachment No.

Land Ownership Map

Land Ownership List

Marked (Redline/Strikeout) Pages

**1**

Unmarked Revised Pages

**2**

### Additional Attachments as Applicable- Select all those apply and add as necessary

- ☐ Signatory Authority
- ☐ Fee Payment Receipt
- ☐ Confidential Documents

## **Permit/Registration Modification without Public Notice or TA**

(See Instructions for P.E. seal requirements.)

### **Required Attachments (for Modifications only)**

**Attachment No.**

Marked (Redline/Strikeout) Pages

Unmarked Revised Pages

### **Additional Attachments as Applicable- Select all those apply and add as necessary**

- ☐ Signatory Authority
- ☐ Fee Payment Receipt
- ☐ Confidential Documents

## Permit/Registration Name Change/Transfer Modification

(See Instructions for P.E. seal requirements.)

### Required Attachments

### Attachment No.

TCEQ Core Data Form(s)

Property Legal Description

Property Metes and Bounds Description

Metes and Bounds Drawings

On-Site Easements Drawing

Land Ownership List

Land Ownership Map

Property Owner Affidavit

Verification of Legal Status

Evidence of Competency

### Additional Attachments as Applicable- Select all those apply and add as necessary

- ☐ Signatory Authority
- ☐ Fee Payment Receipt
- ☐ Confidential Documents
- ☐ Final Plat Record of Property, if platted
- ☐ Assumed Name Certificate

ATTACHMENT NO. 1

MARKED (REDLINE/STRIKEOUT) PAGES

Parts I and II, including:

Cover Page and

Text Page 8.



**PARTS I AND II**

**MUNICIPAL SOLID WASTE PERMIT APPLICATION**

**FOR**

**TALL PINES DISPOSAL FACILITY  
HOUSTON, HARRIS COUNTY, TEXAS**

**Prepared for the Applicant:**

**Waste Corporation of Texas, L.P.  
1330 Post Oak Blvd, Floor 30  
Houston, Texas 77056**

**Prepared and Revisions 1 and 2 by:**

**Golder Associates  
15603 West Hardy St.  
Suite 345  
Houston, Texas 77060  
(281) 931-8674**

**Revision 3 by:**

**SCS ENGINEERS  
Texas Board of Professional Engineers Registration No. F-3407  
12651 Briar Forest, Suite 205  
Houston, Texas 77077  
(281) 397-6747**

**October 2002  
July 2003 (Revision 1)  
September 2003 (Revision 2)  
~~November 2014~~ January 2015 (Revision 3)**

that the 300-yard setback requirement be waived for this Facility. Further, WCT believes that believe that the 300-yard buffer should be waived for this site for the following reasons:

- The site was previously operated as a sand mining operation. The proposed landfill approximately coincides with the mined excavation. Upon completion of landfill activities, this excavation will be filled with the engineered landfill, preventing the situation of an abandoned excavation. Further, leaving the excavation would potentially allow surface water to pond near the base of the constructed landfill. Constructing the landfill to the proposed final contours will provide for positive drainage for the entire property on which the site is proposed.
- Farrell Road is a two-lane asphalt road that connects East Hardy Road and Aldine Westfield Road. Farrell Road is relatively lightly traveled, with an existing volume equal to approximately 36% of the volume on East Hardy Road and approximately 15% of volume on Aldine Westfield Road.
- As shown on Figures 2 and 3 in the Parts I/II Figures, the land use along Farrell Road in the vicinity of the proposed landfill consists primarily of undeveloped land, with some commercial/industrial and mining.
- The proposed configuration will still provide for a buffer zone in excess of 200 feet in which disposal operations will not occur.
- WCT will implement a screening plan as described in Part IV – Site Operating Plan that will augment the existing screening provided by the treeline along Farrell Road.

An official with Harris County Pollution Control (HCPC) was contacted about the proposed waiver of the 300-yard setback. This official did not express concern about the reduced setback from Farrell Road. Documentation of the correspondence with HCPC is included in Appendix A-7.

## 2.3 TRANSPORTATION ANALYSIS

The transportation analysis includes data on the availability and adequacy of roads that the owner or operator will use to access the site; data on the volume of vehicular traffic on access roads within one mile of the Facility, both existing and expected, during the expected life of the Facility; projected volume of traffic expected to be generated by the Facility on the access roads within one mile of the Facility; documentation of coordination of all designs associated with site entrances with the agency exercising maintenance responsibility of the public roadway involved; documentation of coordination with the Texas Department of Transportation (TxDOT) and location restrictions; and an analysis of the Facility upon airports relating to airport safety with documentation of coordination with the Federal Aviation Administration for compliance with airport location restrictions.

### 2.3.1 Site Access

Public access to the Facility will be provided by one of four entrance options. The Facility may utilize any one of four options for entrance to the Facility. An existing entrance is located at 18710 East Hardy Road between East Richey Road and East Airtex Drive. An alternate entrance is proposed approximately 1,800 feet south of the existing entrance on East Hardy Road. Two different alternate entrances are proposed off of Farrell Road between Aldine Westfield Road and East Hardy Road. The owner or operator will obtain required permits from appropriate governmental agencies prior to construction of any new driveway entrances. Only one entrance may be used at any time. Vehicular traffic to the Facility will generally access the Facility using IH-45, the Hardy Toll Road, Airtex Drive, Richey Road, East

ATTACHMENT NO. 2

UNMARKED REVISED PAGES

Parts I and II, including:

Cover Page;

Table of Contents Pages i, ii, and iii; and

Text Pages 8 and 9.



**PARTS I AND II**

**MUNICIPAL SOLID WASTE PERMIT APPLICATION**

**FOR**

**TALL PINES DISPOSAL FACILITY  
HOUSTON, HARRIS COUNTY, TEXAS**

**Prepared for the Applicant:**

**Waste Corporation of Texas, L.P.  
1330 Post Oak Blvd, Floor 30  
Houston, Texas 77056**

**Prepared and Revisions 1 and 2 by:**

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12651 Briar Forest, Suite 205  
Houston, Texas 77077  
(281) 397-6747**

**October 2002  
July 2003 (Revision 1)  
September 2003 (Revision 2)  
January 2015 (Revision 3)**



*James R. Murray III*  
01/12/15



**PARTS I AND II  
MUNICIPAL SOLID WASTE PERMIT APPLICATION FOR  
TALL PINES DISPOSAL FACILITY  
HARRIS COUNTY, TEXAS**



01/12/15  
TBPE Reg. # F-3407

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## DOCUMENTATION

Adjacent and Potentially Affected Landowners

Legal Description

Property Owner Affidavit

Legal Authority

Evidence of Competency

Appointments



**PARTS I AND II  
MUNICIPAL SOLID WASTE PERMIT APPLICATION FOR  
TALL PINES DISPOSAL FACILITY  
HARRIS COUNTY, TEXAS**

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**A – Correspondence**

1. HGACOG Regional Solid Waste Management Plan Compliance Correspondence
2. Archaeological/Historical Quality Review
3. TXDOT and Other Transportation Related Correspondence (Revised November 2014)
4. TCEQ Correspondence/Compliance with the Clean Water Act
5. TPDES Correspondence with the TCEQ
6. Endangered Species Demonstration
7. Harris County Pollution Control Correspondence

**B – Location Restrictions**

1. Airport Safety
2. Floodplains
3. Wetlands
4. Fault Areas
5. Seismic Impact Zones
6. Unstable Areas

that the 300-yard setback requirement be waived for this Facility. Further, WCT believes that believe that the 300-yard buffer should be waived for this site for the following reasons:

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### 2.3.1 Site Access

Public access to the Facility will be provided by one of four entrance options. The Facility may utilize any one of four options for entrance to the Facility. An existing entrance is located at 18710 East Hardy Road between East Richey Road and East Airtex Drive. An alternate entrance is proposed approximately 1,800 feet south of the existing entrance on East Hardy Road. Two different alternate entrances are proposed off of Farrell Road between Aldine Westfield Road and East Hardy Road. The owner or operator will obtain required permits from appropriate governmental agencies prior to construction of any new driveway entrances. Only one entrance may be used at any time. Vehicular traffic to the Facility will generally access the Facility using IH-45, the Hardy Toll Road, Airtex Drive, Richey Road, East

Hardy Road, Rankin Road, Aldine Westfield Road, and Farrell Road. East Hardy Road is a major thoroughfare that is presently two lanes with roadside ditches. Farrell Road is an industrial access road that is presently two lanes with roadside ditches. Aldine Westfield Road is a major thoroughfare that is presently a four lane divided roadway. Richey Road is a major thoroughfare north of the landfill that is presently a four lane roadway. Rankin Road is a major thoroughfare south of the landfill that is presently a four lane roadway.

If the site entrance is located at either location on East Hardy Road, trucks from the north and south will access the site exclusively via East Hardy Road. Traffic signalized intersections at Richey Road and Rankin Road prevents congestion and turning movements are adequate for all the existing and planned truck traffic. Trucks from the east will either use Richey Road or Rankin Road to connect to East Hardy Road for access. Trucks from the west will use IH-45, the Hardy Toll Road or Imperial Valley Drive to reach Rankin Road or Richey Road and then turn onto East Hardy Road to access the Facility.

If the site entrance is located at either location on Farrell Road, trucks from the north will utilize Richey Road and Aldine Westfield Road to turn onto Farrell Road and access the Facility. Trucks from the south will utilize East Hardy Road to turn onto Farrell Road and access the Facility. Trucks from the east may use either Richey Road or Aldine Westfield Road to turn onto Farrell Road and access the facility; or, Rankin Road to turn onto East Hardy Road and then Farrell Road to access the Facility. Trucks from the west may use IH-45, the Hardy Toll Road or Imperial Valley Drive to reach Rankin Road or Richey Road. If trucks from the west utilize Rankin Road, they will turn onto East Hardy Road and then Farrell Road to access the Facility. If trucks from the west use Richey Road, they will turn south onto Aldine Westfield Road and then turn onto Farrell Road to access the facility. Traffic signalized intersections at Aldine Westfield and East Hardy Road prevents congestion and turning movements are adequate for all the existing and planned truck traffic.

The existing entrance at 18710 East Hardy Road (see Part III, Attachment 1, Figure ATT1-3 - Site Entrance Plan) is a 24-foot wide concrete driveway. The driveway intersects East Hardy Road at a 90-degree angle in the mid-block. There are no sight restrictions or conflicts that impair the turning of the trucks or the view of drivers on East Hardy Road. Trucks that turn into the driveway have approximately 1,000 feet of stacking room before they reach the entry building. This prevents any traffic congestion on East Hardy Road due to trucks waiting to access the facility. The existing access is cleaned as required to prevent tracking of mud onto East Hardy Road. The driveway is controlled by a stop sign.

The alternate entrance that will be located approximately 1,800 feet south of the existing entrance road (see Part III, Attachment 1, Figure ATT1-3C – Alternate Site Entrance Plan III) on East Hardy Road will be at least a 24-foot wide concrete driveway. This driveway will intersect East Hardy Road at a 90-degree angle at a location with no sight restrictions or conflicts that impair the turning of the trucks or the view of drivers on East Hardy Road. Trucks that turn into the driveway will have approximately 1,200 feet of stacking room before they reach the entry building. This will prevent any traffic congestion on East Hardy Road due to trucks waiting to access the Facility. The driveway will be controlled by a stop sign.

The alternate entrances located on Farrell Road will be at least a 24-foot wide concrete driveway. The driveways will intersect Farrell Road at a 90-degree angle at a location with no sight restrictions or conflicts that impair the turning of the trucks or the view of drivers on East Hardy Road. Trucks that turn into the existing driveway (see Part III, Attachment 1, Figure ATT1-3A – Alternate Site Entrance Plan I) will have approximately 420 feet of stacking room before they reach the entry building. Trucks that turn into the proposed driveway (see Part III, Attachment 1, Figure ATT1-3B – Alternate Site Entrance Plan II) will have approximately 640 feet of stacking room before they reach the entry building. This will