



Texas Commission on Environmental Quality

Waste Permits Division Correspondence

Cover Sheet

Date: 9/4/2025

Facility Name: Strategic Materials

Permit or Registration No.: 40342

Nature of Correspondence:

☐ Initial/New

☒ Response/Revision to TCEQ Tracking No.:
30194332 (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 type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Compost Report
<input checked="" 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:
<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:	



September 4, 2025

MR. ARTHUR DENNY
MUNICIPAL SOLID WASTE PERMITS SECTION MC 124
WASTE PERMITS DIVISION
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
PO BOX 13087
AUSTIN TX 78711-3087

**RE: TYPE V REGISTRATION RESPONSE TO NOD (TRACKING NO. 30194332)
MSW REGISTRATION NO. 40342 – STRATEGIC MATERIALS (RN102563152)
3240 ROBINSON ROAD, MIDLOTHIAN, TX**

Dear Mr. Denny:

On behalf of Strategic Materials, Inc. (SMI), ESE Partners is submitting the enclosed Type V Recycling & Recovery Registration NOD Response for MSW 40342 at the above referenced glass recycling facility. An original and two (2) unmarked copies, and one (1) marked copy of the revisions are included for your consideration. Additionally, one (1) unmarked copy has been mailed directly to the TCEQ Region 4 Office, to the attention of the Waste Section Manager.

Please note that only the pages that have been revised are included with this submittal indicating the revised submission date. A new, original applicant certification statement, and signature page from Form TCEQ-0650, is included. We appreciate your consideration of these revisions and look forward to the continued processing of the application.

Regards,

A handwritten signature in cursive script that reads "Amanda Marcks".

Amanda Marcks, P.E.
Compliance Business Unit Leader
ESE Partners

CC: TCEQ Region 4 Office, 2309 Gravel Dr., Fort Worth, Texas, 76118-6951,
Attention: Waste Section Manager

40342 Strategic Materials – NOD 2

No.	Page	Citation	Checklist Item	NOD Description	NOD Type	Revision Request	Response
1	Page 21	§330.61(h)(1)	Existing conditions summary	<p>The following language is located in the application and does not satisfy the §330.61 requirements.</p> <p>“Land use of this type requires a Special Use Permit (SUP) under the City of Midlothian’s Zoning Ordinance 2.02. SMI will request a pre-application meeting and request that the Planning & Zoning Commission make a determination as to the appropriate classification of the unlisted used based on findings of fact in relation to the nature of the use.”</p>	Incomplete	<p>30 TAC §330.61(h) requires the owner or operator to provide information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest.</p> <p>The application cannot be declared technically complete until the zoning issue has been resolved.</p>	<p>Item pending resolution with City of Midlothian leadership, city council, and Planning & Zoning Commission.</p> <p>The SMI team met with city leadership 8/25/25 and is scheduled to meet again in three weeks on 9/15/25. Action items from the 8/25 meeting included researching history of the site including annexation date(s) and site operations, etc.; and city leadership to discuss internally the zoning table use designations proposed and resulting SUP that would be required.</p>
2	Page 18, 19, 74, 76, 223	§330.203	Waste Acceptance	<p>Several sections, including Part I, Attachment I-1, Supplemental Technical Report, Section 1.3.1, contain the statement,</p> <p>“The combustible waste and inbound wastes containing putrescible residues could be considered a constituent or characteristic that would be a limiting parameter impacting or influencing the design and operation of the facility.”</p>	Inconsistent	<p>Provide narrative that describes the acceptance of waste will not impact the facility or cause the facility to be redesigned.</p> <p>Provide sufficient operating procedures to describe the acceptance of all waste to be accepted, processed, recycled and/or disposed. Revise the waste acceptance plan to clarify the following comment, located throughout the application.</p> <p>Clarify the intent of the language in Section 1.3.1 and all other similar language throughout the entire application (Part II, Section 3.1, 3.3.1, Part IV, Section 3.1, etc.)</p>	<p>See Part I, Section 1.3.1; Part II, Section 3.1; Part II, Section 3.3.1; Part IV, Section 3.1</p> <p>Revised text to clarify waste disposal 24-72 hours. Waste storage capacity is limited based on the design capacity of the bunker. If design changes are required for registration or modification, those will be address in the future when needed.</p> <p>Updated text to state additional waste acceptance procedures for waste entrance to waste storage/disposal.</p>
3	Page 232	§330.221(b)	Storage Requirements	<p>Section 7.3 Fire Equipment does not state that the fire extinguishers will be routinely inspected.</p>	Omitted	<p>In order for the fire protection equipment to be readily available, provide for the routine inspection of all firefighting equipment.</p>	<p>See Part IV, Section 7.3</p> <p>Revised text from annual inspection of each extinguisher to routine (Monthly).</p>



MSW TYPE V RECYCLING and RECOVERY REGISTRATION APPLICATION

STRATEGIC MATERIALS

3240 Robinson Road

Midlothian, Ellis County, Texas

DATE: SEPTEMBER 4, 2025

PROJECT: 19-0502-008

DOC NO.: REP-19-0502-008 Rev 2

Application No: 40342

PREPARED FOR:

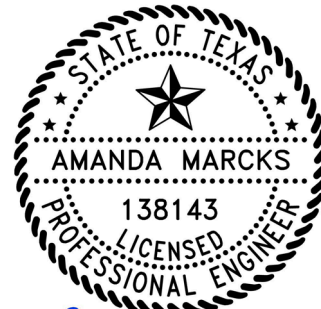
Strategic Materials, Inc. (SMI)

3240 Robinson Road

Midlothian, TX 76065

RN 102563152

CN600418008



Amanda Marcks

9/4/2025

PREPARED BY:

ESE Partners, LLC

2002 West Grand Parkway North

Suite 140

Katy, TX 77449

Telephone: 281 501 6100

Facsimile: 281 501 6105

www.esepartners.com

Copyright © 2024

Document Production / Revision Status						
Rev	Description	Date	Contributors	Author	Technical Review	Internal Standards Review
0	Final Draft	9/17/24	Mason Finley	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			Stephanie Sartain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			Noah Pastor	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			Amanda Marcks, P.E.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1	NOD Response	6/30/2025	Stephanie Sartain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			Jordan Hazelwood	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			Amanda Marcks, P.E.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2	NOD 2 Response	9/4/2025	Stephanie Sartain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			Amanda Marcks, P.E.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>



Contents

PART I	1
ATTACHMENT I-1.....	16
1.1 General Description	17
1.2 Description of Waste.....	17
1.3 Capacity and Waste Acceptance	17
1.3.1 Type of Waste Accepted	18
1.3.2 Prohibited Wastes	19
1.3.3 Measures for Controlling Prohibited Wastes.....	20
1.4 Additional Information	21
1.4.1 Site Location and Roadway Access	21
1.4.2 Transfer Building Design	21
1.4.3 Spill Control.....	22
1.4.4 Property Location Considerations.....	22
1.4.5 Permits, Registration, or other Authorizations [30 TAC §330.55].....	22
ATTACHMENT I-2.....	24
1.1 Facility Legal Description	25
ATTACHMENT I-4.....	34
ATTACHMENT I-5.....	37
1.1 Discussion	38
ATTACHMENT I-6.....	41
1.1 SMI Solid Waste Sites	42
1.2 SMI Key Personnel	42
1.3 Equipment	42
ATTACHMENT I-7.....	48
ATTACHMENT I-8.....	52
ATTACHMENT I-9.....	55
ATTACHMENT I-10.....	60
ATTACHMENT I-11.....	62

PART II	72
1 INTRODUCTION	73
2 EXISTING CONDITIONS SUMMARY [30 TAC §330.61(A)]	73
3 WASTE ACCEPTANCE PLAN [30 TAC §330.61(B)]	74
3.1 Waste Sources [30 TAC §330.61(b)(1)(A)]	74
3.2 Maximum Amount of Waste Received at Solid Waste Transfer Station [30 TAC §330.61(b)(1)(B)]	75
3.2.1 Maximum Amount of Solid Waste to be Stored at the Facility	75
3.2.2 Intended Destination	76
3.3 Waste Characteristics [30 TAC §330.61(b)(1)]	76
3.3.1 Accepted Wastes	76
3.3.2 Prohibited Wastes	77
3.3.3 Waste Recovery	78
3.3.4 Registration Qualifications [30 TAC §330.61(b)(2)]	78
4 GENERAL LOCATION MAPS [30 TAC §330.59(C)(1-2); §330.61(C); §330.61(E)]	79
4.1 General Location Maps	79
4.1.1 Wind Rose [30 TAC §330.61(c)(1)]	79
4.1.2 Known Water Wells [30 TAC §330.61(c)(2)]	79
4.1.3 Structures and Inhabitable Buildings within 500-feet [30 TAC §330.61(c)(3)]	79
4.1.4 Features within One Mile of the Facility [30 TAC §330.61(c)(4)]	79
4.1.5 Roads within One Mile Used by the Facility [30 TAC §330.61(c)(5)]	80
4.1.6 Latitude and Longitude [30 TAC §330.61(c)(6)]	80
4.1.7 Area Streams [30 TAC §330.61(c)(7)]	80
4.1.8 Airports within Six Miles of the Facility [30 TAC §330.61(c)(8)]	80
4.1.9 Property Boundary [30 TAC §330.61(c)(9)]	80
4.1.10 Drainage, Pipelines, and Utility Easement [30 TAC §330.61(c)(10)]	80
4.1.11 Facility Access Control [30 TAC §330.61(c)(11)]	80
4.1.12 Archaeological Sites, Historical Sites, and Sites with Exceptional Aesthetic Qualities Adjacent to the Facility [30 TAC §330.61(c)(12)]	80
5 FACILITY LAYOUT MAPS [30 TAC §330.61(D)]	81
5.1 Facility Units and Locations of Buildings [30 TAC §330.61(d)(1) and (4)]	81
5.2 Interior Facility Roadways and Entrance Roads [30 TAC §330.61(d)(2) and (8)]	81
5.3 Locations of Monitor Wells [30 TAC §330.61(d)(3)]	81
5.4 Fencing [30 TAC §330.61(d)(6)]	81

5.5	Screening [30 TAC §330.61(d)(7)]	81
5.6	Construction Sequence of the Facility [30 TAC §330.61(d)(5)].....	81
6	GENERAL TOPOGRAPHIC MAP [30 TAC §330.61(E)]	81
7	AERIAL PHOTOGRAPH [30 TAC §330.61(F)]	81
8	LAND-USE MAP [30 TAC §330.61(G)]	82
9	IMPACT ON SURROUNDING AREA [30 TAC §330.61(H) & §330.543].....	82
9.1	Surrounding Land Uses [30 TAC §330.61(h)(2)]	82
9.2	Zoning Map [30 TAC §330.61(h)(1)]	82
9.3	Growth Trends [30 TAC §330.61(h)(3)].....	83
9.4	Proximity of Site to Sensitive Receptors [30 TAC §330.61(h)(4)]	83
9.4.1	Population Densities within a Mile of the Site	84
9.4.2	Proximity to Residences within a Mile of the Site.....	84
9.4.3	Proximity to Commercial Establishments within a Mile of the Site	84
9.4.4	Proximity to Schools within a Mile of the Site	84
9.4.5	Proximity to Churches	84
9.4.6	Proximity to Cemeteries	84
9.5	Water Wells within 500 Feet [30 TAC §330.61(h)(5)]	84
9.6	Easements, Buffer Zones, and Rights-of-Ways [30 TAC §330.543(a)].....	85
10	TRANSPORTATION	85
10.1	Availability and Adequacy of Roads [30 TAC §330.61(i)(1)]	85
10.1.1	Volume of Vehicular Traffic [30 TAC §330.61(i)(2) and (3)]	85
10.1.2	Existing Traffic Data	85
10.1.3	Conclusions	86
10.2	Design Coordination	86
10.3	Impact of the Facility on Airports [30 TAC §330.545(b)]	86
11	GENERAL GEOLOGY AND SOILS STATEMENT [30 TAC §330.61(J)]	87
11.1	General Geology Data for the Site [30 TAC §330.61(j)(1)]	87
11.2	General Soil Data for the Site [30 TAC §330.61(j)(1)]	87
	Austin Silty Clay (AuB), 1 to 3 Percent Slopes	87
	Austin Silty Clay (AuC2), 2 to 5 Percent Slopes, Moderately Eroded	88
	Eddy Gravelly Clay Loam (EcB), 1 to 3 Percent Slopes	88
11.3	Faults, Seismic Zones, and Unstable Areas [30 TAC §330.61(j)(2) thru (4)]	88

12	GROUNDWATER AND SURFACE WATER [30 TAC §330.61(K)]	88
12.1	Groundwater Conditions [30 TAC §330.61(k)(1)]	88
12.2	Surface Water Conditions at the Site [30 TAC §330.61(k)(2)]	89
12.3	Compliance with TPDES Requirements [30 TAC §330.61(k)(3)]	89
13	ABANDONED OIL, GAS, AND WATER WELLS [30 TAC §330.61(L)]	90
13.1	Existing or Abandoned Water Wells at the Site [30 TAC §330.61(l)(1)]	90
13.2	Existing or Abandoned Oil or Gas Wells at the Site [30 TAC §330.61(l)(2)]	90
14	FLOODPLAINS AND WETLANDS STATEMENT [30 TAC §330.61(M)]	90
14.1	Floodplains [30 TAC §330.61(m)(1)]	90
14.2	Wetlands [30 TAC §330.61(m)(2) and (3), §330.553(A)&(b), §330.553(b)(1), §330.553(b)(3)(A) thru (F), §330.553(b)(4)],	90
15	ENDANGERED OR THREATENED SPECIES [30 TAC §330.61(N)]	91
15.1	Background	91
15.2	Alligator Snapping Turtle	91
15.3	Black Rail	92
15.4	Interior Least Tern	92
15.5	Louisiana Pigtoe	92
15.6	Piping Plover	93
15.7	Rufa Red Knot	93
15.8	Sandback Pocketbook	93
15.9	Texas Heelsplitter	94
15.10	Texas Horned Lizard	94
15.11	Trinity Pigtoe	94
15.12	White-faced Ibis	95
15.13	Whooping Crane	95
15.14	Wood Stork	96
15.15	Conclusions	96
16	CULTURAL RESOURCES [30 TAC §330.61(O)]	96

17	COUNCIL OF GOVERNMENTS AND LOCAL GOVERNMENTS REVIEW REQUEST [30 TAC §330.61(P)]	96
18	CONCLUSIONS	97
	ATTACHMENT II-1	98
	ATTACHMENT II-2.....	112
	ATTACHMENT II-3.....	114
	ATTACHMENT II-4.....	116
	ATTACHMENT II-5.....	118
	ATTACHMENT II-6.....	121
	ATTACHMENT II-7	127
	ATTACHMENT II-8.....	130
	ATTACHMENT II-9.....	132
	ATTACHMENT II-10.....	135
	ATTACHMENT II-11	137
	ATTACHMENT II-12.....	139
	ATTACHMENT II-13.....	164
	PART III	167
1	INTRODUCTION	168
2	GENERAL FACILITY DESIGN.....	168
2.1	Facility Access [30 TAC §330.63(b)(1)].....	168
2.2	Waste Movement [30 TAC §330.63(b)(2)].....	168
2.2.1	Flow Diagram [30 TAC §330.63(b)(2)(A)]	168
2.2.2	Schematics [30 TAC §330.63(b)(2)(B)].....	169
2.3	Ventilation and Odor Control Measures [30 TAC §330.63(b)(2)(C)]	169
2.4	Generalized Construction Details [30 TAC §330.63(b)(2)(D)].....	169
2.5	Containment Walls [30 TAC §330.63(b)(2)(F)].....	170
2.6	Storage of Grease, Oil, and Sludge [30 TAC 330.63(b)(2)(G)]	170
2.7	Disposition of Effluent [30 TAC §330.63(b)(2)(H)]	170

2.8	Noise Pollution Control [30 TAC §330.63(b)(2)(I)]	171
2.9	Sanitation [30 TAC §330.63(b)(3)(A) thru (D)].....	171
2.10	Water Pollution Control [30 TAC §330.63(b)(4)].....	172
2.11	Endangered Species Protection [30 TAC §330.63(b)(5)]	172
3	SURFACE WATER DRAINAGE [30 TAC 330.63.C].....	173
3.1	Facility Surface Water Drainage Report [30 TAC 330.63(c)]	173
4	WASTE MANAGEMENT UNIT DESIGN [30 TAC §330.63(D)]	173
4.1	Rapid Processing and Detention of Solid Waste [30 TAC §330.63(d)(1)(A)]	173
4.2	Prevention of Nuisances or Public Health Hazards [30 TAC §330.63(d)(1)(A)]	175
4.2.1	Spill Control [30 TAC §330.63(d)(1)(B)].....	176
4.2.2	Maximum Allowable Storage Time [30 TAC §330.63(d)(1)(c)].....	176
4.3	Incineration Units [30 TAC §330.63(d)(2)].....	176
4.4	Surface Impoundments [30 TAC §330.63(d)(3)].....	176
4.5	Landfill Units and Arid Landfill Exemptions [30 TAC §330.63(d)(6)]	176
4.6	Type V Mobile Liquid Waste Processing Units [30 TAC §330.63(d)(6)].....	176
4.7	Type IX Energy, Material, Gas Recovery for Beneficial Use, or Landfill Mining Waste Processing Units [30 TAC §330.63(d)(7)].....	176
4.8	Compost Units [30 TAC §330.63(d)(8)]	176
4.9	Type IV Waste Processing Demonstration Facilities [30 TAC §330.63(d)(9)] ...	176
5	GEOLOGY REPORT [30 TAC §330.63(E)].....	176
6	GROUNDWATER SAMPLING AND ANALYSIS [30 TAC §330.63(F)].....	177
7	LANDFILL GAS MANAGEMENT PLAN [30 TAC §330.63(9)].....	177
8	CLOSURE PLAN FOR PROCESSING FACILITIES [30 TAC §330.63 (H) & 30 TAC §330.459(A) THRU (C)].....	177
9	CLOSURE COST ESTIMATES [30 TAC §330.63(J) & 30 TAC §330.505(A)]	177
9.1	[30 TAC §330.505(a)(2)(A)]	177
9.2	[30 TAC §330.505(a)(2)(B)-(C)]	177
9.3	[30 TAC §330.505(a)(3)]	177
9.4	[30 TAC §330.505(b)]	178

ATTACHMENT III-1.....	179
ATTACHMENT III-2.....	187
ATTACHMENT III-3.....	189
1 INTRODUCTION	190
2 NOTIFICATION	190
3 CLOSURE ACTIVITIES.....	190
4 CERTIFICATION	191
5 POST CLOSURE PLAN.....	191
ATTACHMENT III-4.....	192
PART IV SITE OPERATING PLAN.....	218
1 INTRODUCTION	219
1.1 Part IV Application Contents [30 TAC §330.65].....	219
2 PERSONNEL AND SITE MAINTENANCE.....	219
2.1 Transfer Station Personnel	219
2.2 Equipment	220
2.3 Facility Inspection and Maintenance	220
2.4 Training Requirements.....	221
2.4.1 Personnel Training Records	221
2.4.2 Personnel Operator Licenses	221
2.4.3 Proper and Current Operational Standards	221
2.4.4 Personnel Training Program.....	221
2.4.5 New Employees	221
2.4.6 Training Meetings.....	222
2.4.7 Facility Personnel.....	222
3 WASTE ACCEPTANCE AND ANALYSIS [30 TAC §330.203]	222
3.1 Authorized Wastes.....	222
3.2 Receipt of Industrial Waste	223
3.3 Receipt of Special Waste	223
3.4 Prohibited Wastes.....	223
3.4.1 Measures for Controlling Prohibited Wastes.....	224

3.5	Waste Analysis [30 TAC §330.203(b)]	226
3.6	Facility-Generated Wastes [30 TAC §330.205]	227
4	CONTAMINATED WATER MANAGEMENT [30 TAC §330.207]	228
4.1	Contaminated Water Management Plan	228
5	STORAGE REQUIREMENTS	228
5.1	Solid Waste Storage [30 TAC §330.209].....	228
5.2	Approved Containers [30 TAC §330.211].....	229
6	RECORDKEEPING AND REPORTING REQUIREMENTS [30 TAC §330.219].....	229
6.1	Documents and Records to be Maintained	229
6.2	Maintenance of Training Records and Required Licenses	231
6.3	Report Signatures.....	231
7	FIRE PROTECTION [30 TAC §330.221(A) THRU (C)]	231
7.1	Introduction.....	231
7.2	Water Supply [30 TAC §330.221(a)]	231
7.3	Fire Equipment [30 TAC §330.221(b)]	232
7.4	Fire Protection Plan [30 TAC §330.221(c)].....	232
	7.4.1 Fire Protection Source and Procedures.....	232
	7.4.2 Fire Fighting Methods.....	232
	7.4.3 Fire Protection Training	232
7.5	TCEQ Notification	233
8	ACCESS CONTROL [30 TAC §330.223]	233
8.1	Facility Security.....	233
8.2	Vehicle Access	234
9	UNLOADING OF WASTE [30 TAC §330.225]	234
9.1	Unloading of Waste.....	234
9.2	Spill Prevention and Control [30 TAC §330.227]	235
10	FACILITY OPERATING HOURS [30 TAC §330.229].....	236
11	FACILITY SIGN [30 TAC §330.231].....	236
12	LITTER CONTROL MEASURES.....	237

12.1	Control of Windblown Material and Litter [30 TAC §330.233]	237
12.2	Materials along the Route of the Facility [30 TAC §330.235]	237
12.3	Facility Access Roads [30 TAC §330.237]	237
12.4	Noise Pollution and Visual Screening [30 TAC §330.239]	238
12.5	Overloading and Breakdown [30 TAC §330.241]	238
12.6	Backup Provision	239
13	SANITATION [30 TAC §330.243]	239
14	VENTILATION AND AIR POLLUTION CONTROL [30 TAC §330.245]	239
15	HEALTH AND SAFETY [30 TAC §330.247]	240
15.1	Employee Sanitation Facilities [30 TAC §330.249]	240
15.2	Disease Vector Control	240
15.3	Salvaging and Scavenging	240
15.4	Visual Screening of Waste	241
ATTACHMENT IV-1		242
ATTACHMENT IV-2		249



Amanda Marcks

9/4/2025

PART I

STRATEGIC MATERIALS FACILITY

MSW Registration Number 40342

Midlothian, Ellis County, Texas

Prepared For:

STRATEGIC MATERIAL, INC.

Rev. 2

Date Prepared: September 17, 2024

Revision Date: 9/4/2025

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

9/4/2025

Texas Engineering Registration No. F-10131



Texas Commission on Environmental Quality

Part I Application Form for New Permit, Permit Amendment, or Registration for a Municipal Solid Waste Facility

Instructions for completing this Part I Application Form are provided in [TCEQ 00650-instr](#)¹. Include a [Core Data Form \(TCEQ 10400\)](#)² with the application for the facility owner, and Core Data Forms for the operator and property owner if different from the facility owner. If you have questions, contact the Municipal Solid Waste (MSW) Permits Section by email to mswper@tceq.texas.gov, or by phone at 512-239-2335. Rules cited on this form are in Title 30 Texas Administrative Code (30 TAC) and may be viewed online at www.tceq.texas.gov/goto/view-30tac.

Application Tracking Information

Facility Regulated Entity Name³:

Strategic Materials

Site Operator (Permittee or Registrant Name)⁴:

Strategic Material, Inc.

MSW Authorization Number: 40342

Initial Submission Date: 9/17/24

Revision Date: 9/4/2025

Application Data

1. Submission Type

☐ Initial Submission

☒ Notice of Deficiency (NOD) Response

2. Authorization Type

☐ Permit

☒ Registration

3. Application Type

☐ New Permit

☐ Permit Major Amendment

☐ Permit Limited Scope Major Amendment

☒ New Registration

¹ www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/00650-instr.pdf

² www.tceq.texas.gov/goto/coredata

³ Facility Regulated Entity Name must match the Regulated Entity Name indicated on the TCEQ Core Data Form.

⁴ Site Operator is defined in 30 TAC 330.3(148) as the holder of, or the applicant for, an authorization (or license) for a municipal solid waste facility.

4. Application Fee

Amount

- ☐ \$2,050—New Landfill Permits, and Landfill Permit Major Amendments Described in 30 TAC [305.62\(j\)\(1\)](#)
- ☒ \$150—Other Permits, Permit Amendments, Limited Scope Major Amendments, and all Registrations

Payment Method

- ☒ Online through ePay portal www3.tceq.texas.gov/epay/

Enter ePay Trace Number: 582EA000625464

- ☐ Check (send to TCEQ Financial Administration Division)

Payor Name: _____ Check Number: _____

5. Electronic Versions of Application

TCEQ will publish electronic versions of the application online. Applicants must provide a clean copy of the administratively complete application and technically complete application. TCEQ will also publish electronic versions of NOD responses online.

6. Party Responsible for Publishing Notice

Indicate who will be responsible for publishing notice:

- ☐ Applicant ☐ Agent in Service ☒ Consultant

Contact Name: Amanda Marcks

Title: Consultant

Email Address: amarcks@esepartners.com

7. Alternative Language Notice

Use the Alternative Language Checklist on Public Notice Verification Form TCEQ-20244-Waste-NORI, TCEQ-20244-Waste-NAPD, or TCEQ-20244-Waste-NAORPM available at www.tceq.texas.gov/permitting/waste_permits/msw_permits/msw_notice.html to determine if an alternative language notice is required.

Is an alternative language notice required for this application?

- ☐ Yes ☒ No

Indicate the alternative language: _____

8. Public Place for Copy of Application

Name of the Public Place: Midlothian Public Library

Physical Address: 215 N. 8th Street

City: Midlothian County: Texas State: TX Zip Code: 76065

Phone Number: 972-775-7080

9. Consolidated Permit Processing

Is this submittal part of a consolidated permit processing request, in accordance with 30 TAC Chapter 33?

☐ Yes ☒ No

If "Yes", indicate the other TCEQ program authorizations requested:

10. Confidential Documents

Does the application contain confidential documents?

☐ Yes ☒ No

If "Yes", reference the confidential documents in the application, but submit the confidential documents as an attachment in a separate binder marked "CONFIDENTIAL."

11. Permits and Construction Approvals

Mark the following table to indicate status of other permits or approvals.

Table 1. Permits and Construction Approvals.

Permit or Approval	Received	Pending	Not Applicable
Hazardous Waste Management Program under Texas Solid Waste Disposal Act			x
Underground Injection Control Program under Texas Injection Well Act			x
National Pollutant Discharge Elimination System Program under Clean Water Act; Waste Discharge Program under Texas Water Code, Chapter 26	x		
Prevention of Significant Deterioration Program under Federal Clean Air Act (FCAA); Nonattainment Program under the FCAA			x
National Emission Standards for Hazardous Air Pollutants Preconstruction Approval under the FCAA			x
Ocean Dumping Permits under Marine Protection Research and Sanctuaries Act			x
Dredge or Fill Permits under Clean Water Act			x
Licenses under the Texas Radiation Control Act			x
Other (describe):			
Other (describe):			

12. General Information About the Facility

Facility Regulated Entity Name:

Strategic Materials

Contact Name: Joe Brown Title: EHS Steward

MSW Authorization Number (if existing): 40342

Regulated Entity Reference Number: **RN** 102563152

Physical or Street Address (if available): 3240 Robinson Rd

City: Midlothian County: Ellis State: TX Zip Code: 76065

Phone Number: (972) 723-2422

Latitude (decimal degrees, six decimal places): 32.470203

Longitude (decimal degrees, six decimal places): -96.954755

Elevation (above mean sea level): 600 feet (benchmark elevation for landfills)

Description of facility location with respect to known or easily identifiable landmarks:

The subject site is bounded on the southwest by US 287, on the north by Robinson Road, and on the east by Eastgate Road.

Access routes from the nearest United States or state highway to the facility:

Direct vehicular access is provided on Robinson Road and Eastgate Road, which are both local streets with a two-lane cross-section within the City of Midlothian, Texas. Both roadways currently provide direct access to US 287 at unsignalized intersections (i.e., stop-signs on the minor street approaches) with full median openings and auxiliary turn lanes on US 287.

Coastal Management Program

Is the facility within the Coastal Management Program boundary?

☐ Yes ☒ No

13. Facility Types

Facility types are described in 30 TAC [330.5\(a\)](#).

Indicate facility type (select all that apply):

☐ Type I ☐ Type IV ☒ Type V
☐ Type IAE ☐ Type IVAE ☐ Type VI

14. Activities Conducted at the Facility

☒ Storage ☒ Processing ☐ Disposal

15. Facility Waste Management Units

Check the box for each type of waste management unit proposed.

- | | |
|---|---|
| <input type="checkbox"/> Landfill Unit(s) | <input type="checkbox"/> Container(s) |
| <input type="checkbox"/> Incinerator(s) | <input checked="" type="checkbox"/> Roll-off Boxes |
| <input type="checkbox"/> Class 1 Landfill Unit(s) | <input type="checkbox"/> Surface Impoundment |
| <input type="checkbox"/> Process Tank(s) | <input type="checkbox"/> Autoclave(s) |
| <input checked="" type="checkbox"/> Storage Tank(s) | <input type="checkbox"/> Refrigeration Unit(s) |
| <input type="checkbox"/> Tipping Floor | <input type="checkbox"/> Mobile Processing Unit(s) |
| <input checked="" type="checkbox"/> Storage Area | <input type="checkbox"/> Compost Pile(s) or Vessel(s) |
| <input type="checkbox"/> Other (specify): | |

16. Description of Proposed Facility or Changes to Existing Facility

Provide a brief description of the proposed activities if application is for a new facility, or the proposed changes to an existing facility or permit conditions if the application is for an amendment.

Strategic Materials, Inc. (SMI) is proposing an initial registration for an existing Type V Municipal Solid Waste (MSW) transfer station with recovery operations, located in Ellis County within the city limits of the Midlothian, Texas at 3240 Robinson Road, Texas 76065. SMI has an existing 11.0-acre property, with Medium Industrial (MI) zoning, that the Strategic Materials facility is located on. The cities and counties which distribute material to the MRFS that SMI collects from include City of Longview, City of Tyler, Dallas County, Tarrant County, City of Temple, Travis County, Bexar County, Harris County, City of Tulsa, and City of Oklahoma City. The Strategic Materials facility will serve as a transfer station, with recycling and recovery operations, for solid waste from those communities

Registration Qualifications:

Strategic Materials will meet the 10% recycling provisions set forth in TAC § 330.9(e)(1). Additionally, the remaining non-recyclable and non-reusable incoming materials will be transferred to a TCEQ authorized MSW landfill located within 50 miles of the transfer station to comply with requirements in [30 TAC §330.9(e)(2)].

17. Facility Contact Information

Site Operator (Permittee or Registrant)

Name: Strategic Materials, Inc. (SMI)
Customer Reference Number: **CN** 600418008
Contact Name: Zach Aucker Title: Environmental Compliance Manager
Mailing Address: 1856 Old Berwick Rd
City: Bloomsberg County: Columbia State: PA Zip Code: 17815
Phone Number: 570-238-5232
Email Address: zaucker@sibelco.com

Operator (if different from Site Operator)

Name: _____
Customer Reference Number: **CN** _____
Contact Name: _____ Title: _____
Mailing Address: _____
City: _____ County: _____ State: _____ Zip Code: _____
Phone Number: _____
Email Address: _____

Consultant (if applicable)

Firm Name: ESE Partners
Consultant Name: Amanda Marcks, P.E.
Texas Board of Professional Engineers Firm Registration Number: _____
Contact Name: Amanda Marcks, P.E. Title: Compliance Business Unit Leader
Mailing Address: 400 E Royal Lane, Suite 203
City: Irving County: Dallas State: TX Zip Code: 75039
Phone Number: 940-440-2435
Email Address: amarcks@esepartners.com

Agent in Service (required for out-of-state applicants)

Name: CORPORATE CREATIONS NETWORK
Mailing Address: 5444 WESTHEIMER #1000
City: Houston County: Harris State: TX Zip Code: 77056
Phone Number: _____
Email Address: _____

18. Facility Supervisor License

Indicate the level of Municipal Solid Waste Facility Supervisor license, as defined in 30 TAC Chapter 30, Occupational Licenses and Registrations, Subchapter F that the individual who supervises or manages the operations will obtain prior to commencing operations.

☐ Class A Supervisor License ☒ Class B Supervisor License

19. Facility Ownership

Facility Owner

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

☐ Yes ☒ No

If "No", provide the following information for the other owner, and include a Core Data Form for the other owner. Attach supplemental sheet if more than one other owner.

Other Owner Name: WAYNE HILL

What is Owned: ☐ Facility Units ☒ Property

☐ Other (describe): _____

Mailing Address: PO BOX 425

City: Murchison County: Henderson State: TX Zip Code: 75778

Phone Number: 214-957-1004

Email Address: wehillmidlo@aol.com

20. Other Government Entities Information

Texas Department of Transportation

District: Dalla

District Engineer's Name: Ceason Clemens, P.E.

Mailing Address: 4777 E Highway 80

City: Mesquite County: Dallas State: TX Zip Code: 75150

Phone Number: 214-320-6200

Email Address: ceason.clemens@txdot.gov

Local Government Authority Responsible for Road Maintenance (if applicable)

Government or Agency Name: City of Midlothian

Contact Person's Name: Mike Adams

Mailing Address: 104 W. Avenue E

City: Midlothian County: Ellis State: TX Zip Code: 76065

Phone Number: 972-775-7105

Email Address: mike.adams@midlothian.tx.us

City Mayor Information

City Mayor's Name: Justin Coffman
Mailing Address: 104 West Avenue E
City: Midlothian County: Ellis State: TX Zip Code: 76065
Phone Number: 972-775-3481
Email Address: justin.coffman@midlothian.tx.us

City Health Authority

Authority Name: City Manager
Contact Person's Name: Chris Dick
Contact Person's Title: City Manager
Mailing Address: 104 West Avenue E
City: Midlothian County: Ellis State: TX Zip Code: 76065
Phone Number: 972-775-3481
Email Address: chris.dick@midlothian.tx.us

County Judge Information

County Judge's Name: Todd Little
Mailing Address: 109 South Jackson
City: Waxahachie County: Ellis State: TX Zip Code: 75165
Phone Number: 972-825-5000
Email Address: countyjudge@co.ellis.tx.us

County Health Authority

Agency Name: Ellis County Behavioral Health
Contact Person's Name: Caitlin Wilkinson
Contact Person's Title: Director
Mailing Address: 101 W Main St.
City: Waxahachie County: Ellis State: TX Zip Code: 75165
Phone Number: 972-825-5457
Email Address: caitlin.wilkinson@co.ellis.tx.us

State Representative Information

House District Number: 10
State Representative's Name: Brian Harrison
District Office Mailing Address: 100 N College Street, Suite 306
City: Waxahachie County: Ellis State: TX Zip Code: 75165
Phone Number: (972) 923-0264
Email Address: brian.harrison@house.texas.gov

State Senator Information

District Number: 22
State Senator's Name: Brian Birdwell
District Office Mailing Address: 93900 Arlington Highlands Blvd., Suite 265
City: Arlington County: Tarrant State: TX Zip Code: _____
Phone Number: (817) 466-7327
Email Address: brian.birdwell@senate.texas.gov

Council of Governments (COG)

COG Name: North Central Texas Council of Governments
COG Representative's Name: Mike Eastland
COG Representative's Title: Executive Director
Mailing Address: 616 Six Flags Dr
City: Arlington County: Tarrant State: TX Zip Code: 76011
Phone Number: 817-695-9100
Email Address: meastland@nctcog.org

River Basin Authority

Authority Name: Trinity River Authority
Contact Person's Name: Matt Jalbert
Watershed Sub-Basin Name: Chambers River sub-basin
Mailing Address: 5300 S. Collins
City: Arlington County: Tarrant State: TX Zip Code: 76018
Phone Number: 817-467-4343
Email Address: jalbertm@trinityra.org

Local Drainage or Flood Management Authority

Authority Name: City of Midlothian Floodplain Administrator
Contact Person's Name: FLOODPLAIN ADMINISTRATOR
Mailing Address: 104 W. Avenue E
City: Midlothian County: Ellis State: TX Zip Code: 76065
Phone Number: _____
Email Address: mike.adams@midlothian.tx.us

U.S. Army Corps of Engineers District

Indicate the U.S. Army Corps of Engineers district in which the facility is located:

- | | |
|--|--|
| <input type="checkbox"/> Albuquerque, NM | <input type="checkbox"/> Galveston, TX |
| <input checked="" type="checkbox"/> Fort Worth, TX | <input type="checkbox"/> Tulsa, OK |

Local Government Jurisdiction

Within City Limits of: City of Midlothian

Within Extraterritorial Jurisdiction of: _____

Is the facility located in an area in which the governing body of the municipality or county has prohibited the storage, processing, or disposal of municipal or industrial solid waste?

☐ Yes ☒ No

If "Yes", provide a copy of the ordinance as an attachment.

Applicant Signature Page

Site Operator (Permittee or Registrant Name) 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: Dan Prophater Title: VP Glass Recycling Operations

Email Address: Dan.Prophater@sibelco.com

Signature:  Date: 9/4/25

Authorization by Facility Owner for Operator to Submit Application

To be completed by the facility owner if the application is submitted by an operator who is not the facility owner.

I am the owner of the facility that is the subject of this application, and authorize the operator, _____ to submit this application pursuant to 30 TAC 305.43(c).

Name: N/A Title: _____

Email Address: _____

Signature: _____ Date: _____

Notary

SUBSCRIBED AND SWORN to before me by the said Dan Prophater

On this 4th day of September, 2025

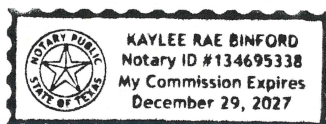
My commission expires on the 29th day of December, 2027

Kaylee Binford

Notary Public in and for

Harris County, Texas (notary's jurisdiction, including county and state)

Note: Application Must Bear Signature & Seal of Notary Public



Property Owner Affidavit

Property Owner Affidavit for Landfill Facility

I acknowledge in accordance with 30 TAC 330.59(d)(2) that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure and post-closure care of the facility. For a facility where waste will remain after closure, I acknowledge that I have a responsibility to file with the county deed records an affidavit to the public advising that the land will be used for a solid waste facility prior to the time that the facility actually begins operating as a municipal solid waste landfill facility, and to file a final recording upon completion of disposal operations and closure of the landfill units according to 30 TAC 330.19 (relating to Deed Recordation). I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and post-closure care period for the purpose of inspection and maintenance.

Name: N/A

Email Address: _____

Signature: _____ Date: _____

Property Owner Affidavit for Processing Facility

I acknowledge in accordance with 30 TAC 330.59(d)(2) that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure of the facility. I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and post-closure care period for the purpose of inspection and maintenance.

Name: Dan Prophater

Email Address: Dan.Prophater@sibelco.com

Signature: *[Handwritten Signature]* Date: 8/28/25

Notary

SUBSCRIBED AND SWORN to before me by the said Dan Prophater, personally appeared before me

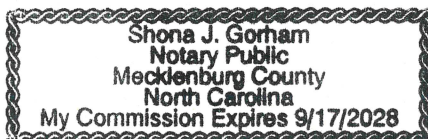
On this 28th day of August, 2025

My commission expires on the 17th day of September, 2028

[Handwritten Signature]
Notary Public in and for

Mecklenburg County / North Carolina (notary's jurisdiction, including county and state)

Note: Application Must Bear Signature & Seal of Notary Public



Part I Attachments

Refer to instruction document [TCEQ 00650-instr⁵](#) for professional engineer seal requirements.

Attachments Table 1. Required attachments.

Required Attachments	Attachment Number
Supplementary Technical Report [30 TAC 305.45(a)(8)]	Attachment I-1
Property Legal Description [30 TAC 330.59(d)(1)]	Attachment I-2
Property Metes and Bounds Description [30 TAC 330.59(d)(1)]	Attachment I-2
Facility Legal Description [30 TAC 330.59(d)(1)]	Attachment I-2
Facility Metes and Bounds Description [30 TAC 330.59(d)(1)]	Attachment I-2
Metes and Bounds Drawings [30 TAC 330.59(d)(1)]	Attachment I-2
On-Site Easements Drawing [30 TAC 330.61(c)(10)]	Attachment I-2
Land Ownership Map [30 TAC 330.59(c)(3)]	Attachment I-3
Landowners List [30 TAC 330.59(c)(3)]	Attachment I-3
Mailing Labels (in electronic file, in Avery 5160 format; see instructions) [30 TAC 281.5(7)]	Attachment I-11
General Location Maps [30 TAC 330.59(c)(2)]	Attachment I-4
Texas Department of Transportation (TxDOT) County Map [30 TAC 330.59(c)(2)]	Attachment I-4
General Topographic Maps [30 TAC 330.61(e)]	Attachment I-4
Verification of Legal Status / Legal Authority (certificate of incorporation) [30 TAC 281.5 and 330.59(e)]	Attachment I-5
Evidence of Competency [30 TAC 330.59(f)]	Attachment I-6
Signatory Authority Documentation [30 TAC 305.44 and 330.59(g)]	N/A
TCEQ Core Data Form(s) TCEQ-10400⁶ [30 TAC 281.5(7)]	Attachment I-7

⁵ www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/00650-instr.pdf

⁶ www.tceq.texas.gov/permitting/central_registry/guidance.html

Attachments Table 2. Additional attachments as applicable.

Additional Attachments (select all that apply and add others as needed)	Attachment Number
<input checked="" type="checkbox"/> Plain Language Summary Form TCEQ-20947 ⁷ [30 TAC 39.405(k)]	Attachment I-8
<input checked="" type="checkbox"/> Public Involvement Plan Form TCEQ-20960 ⁸	Attachment I-9
<input checked="" type="checkbox"/> Fee Payment Receipt	Attachment I-10
<input type="checkbox"/> Confidential Documents	
<input type="checkbox"/> Waste Storage, Processing and Disposal Ordinances [Texas Health and Safety Code, Section 363.112 ⁹]	
<input type="checkbox"/> Final Plat Record of Property Description [30 TAC 330.59(d)(1)(B)]	
Other (describe): https://esepartners.com/es-e-environmental-services-due-diligence-remediation-compliance/environmental-compliance/	
Other (describe):	
Other (describe):	

⁷ www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/20947-instr.pdf

⁸ www.tceq.texas.gov/downloads/agency/decisions/hearings/environmental-equity/pip-form-tceq-20960.pdf
www.tceq.texas.gov/downloads/agency/decisions/hearings/environmental-equity/instructions-for-pip-form-tceq-20960.pdf

⁹ statutes.capitol.texas.gov/Docs/HS/htm/HS.363.htm#363.112

1.3.1 Type of Waste Accepted

The Strategic Materials facility sorts waste primarily in collection and acceptance of unprocessed mixed glass. This is received as whole bottle stream, clear plate and mixed window plate streams and which can include non-glass materials that are non-recyclable, nonreusable, or combustible wastes. Metals are sent offsite for recycling as scrap metal; other materials are removed as trash and transported offsite. Combustible waste includes paper, plastic cardboard, and dust. Non-recyclable materials that are not considered combustible waste are ceramic waste. Both combustible waste and ceramic waste are transported to landfill for disposal.

Inbound waste bottles are stored outdoors prior to processing and may contain food and beverage residues; therefore, these inbound wastes will be stored in leakproof covered bunkers. Processed combustible waste, including paper, plastic cardboard, and dust are collected from discharge points and then emptied into a leakproof landfill bunker, stored outside, under cover and which is equipped with a sprinkler system. Both outdoor storage areas will be maintained in a manner to not constitute a fire, safety, or health hazard or provide food or harborage for animals and vectors, and shall not to result in litter. These bunkers are of sufficient size to contain all solid waste that the SMI generates in the period of time between collections. The inbound pre-processing waste bunker will be constructed to be leakproof, durable, and designed for safe handling and easy cleaning. The bunkers will be turned over every 24-72 hours to allow for cleaning by front loaders, shovels and brooms.

The combustible waste and inbound wastes containing putrescible residues could be considered a constituent or characteristic that would be a limiting parameter impacting or influencing the design and operation of the facility. Waste storage capacity is limited based on the design capacity of the bunker. If design changes are required for registration or modification, those will be addressed in the future when needed. Additionally, combustible waste is picked up for disposal at the landfill every 24-72 hours. Waste acceptance procedures are discussed as follows:

Mixed glass is received on the truck scale and weighed, and the driver is directed to dump the material in front of the mixed bunker (MIXSSU) for testing. The driver then returns to the scale for an empty weight, and a ticket is generated from the Scale House. The material is then visually inspected, and quality samples are collected for lab testing. Once approved, the material is then pushed up into the Mixed bunker (MIXSSU) for processing.

First stage of Production is our PPL Line (Pre-Processing Line), where two major “waste” materials are removed. The first is the Fines (TRASHFINESP). This material is discharged into a segregated area for staging and shipment to one of Strategic Material Facility’s sister plants for further processing. For lot management purposes, if volume needs are met at the sister facility, the Strategic Materials Facility may send excess material to landfill in order to manage working space. The second stream is the oversized material (TRASHP). This combustible material stream is removed via screening and vacuum, and is placed in the Trash Bunker for disposal to landfill. The pre-processed and right-sized material will then be placed in a WIP bunker, for staging and further processing in the Optical Line.

The Optical Line will remove additional fines, and optically rejected material from the sorting machines. The additional fines are placed in the fines bunker (OTHFINESP) and are handled as outlined above. The optically sorted CSP Reject material is staged in the CSP bunker for further processing. Low volume “paper” waste is removed via vacuum, and is placed in the Trash (TRASHP) bunker as well. After processing through the Optical Line, the mixed glass is deposited into a process bunker, where it will await further processing in our 12 Mesh Line. Additional combustible waste can be generated during the Fine Grind process, but in very low volumes.

Combustible waste is removed from the Trash (TRASHP) bunker for landfill disposal every day, six days per week. The combustible waste is weighed at the scale, and a ticket is issued prior to leaving the site for landfill disposal.

1.3.2 Prohibited Wastes

The Strategic Materials facility may not accept the storage or processing of various wastes, including:

1. *Wastes prohibited from disposal in a municipal solid waste facility by 30 TAC §330.15(e), including various:*
 - a. *lead acid storage batteries*
 - b. *whole used or scrap tires*
 - c. *refrigerators, freezers, air conditioners, and other items containing chlorinated fluorocarbon*
 - d. *liquid wastes*
 - e. *regulated hazardous wastes*
 - f. *polychlorinated biphenyls (PCB) wastes*
 - g. *radioactive materials*
2. *Special wastes defined/listed in 30 TAC §330.154, including various:*
 - a. *hazardous waste from conditionally exempt small-quantity generators*
 - b. *Class I industrial nonhazardous waste*
 - c. *treatment plant sludges*
 - d. *septic tank pumpings*
 - e. *grease and grit trap wastes*
 - f. *treatment plant wastes*
 - g. *air pollution control facility waste*
 - h. *tanks, drums, or containers used for material listed as a hazardous constituent*
 - i. *slaughterhouse wastes*
 - j. *dead animals*

PART II

STRATEGIC MATERIALS FACILITY

MSW Registration Number 40342

Midlothian, Ellis County, Texas

Prepared For:

STRATEGIC MATERIAL, INC.

Rev. 2

Date Prepared: September 17, 2024

Revision Date: 9/4/2025

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

9/4/2025

Texas Engineering Registration No. F-10131

require special design considerations or possible mitigation of conditions based on findings in Sections 8-15 of this Part II.

3 WASTE ACCEPTANCE PLAN [30 TAC §330.61(B)]

The following sections present the information required by 30 TAC §330.61(b) regarding the facility's waste acceptance plan.

3.1 Waste Sources [30 TAC §330.61(b)(1)(A)]

The Strategic Materials Facility will accept waste from Materials Recovery Facilities (MRF) and currently provides collection and recycling service to 30 commercial suppliers and 40 residential suppliers. The Strategic Materials Facility collects recyclable materials from eight (8) separate counties within Texas and two (2) cities within Oklahoma. Total populations of counties and cities that are contributing to the MRF's are 14,895,770. Materials received are mixed glass waste for recycling. This is received as a mix of whole plate glass and whole bottle glass. Considering all sources of waste glass, including all MRF sources, whole bottle stream, and clear plate and mixed window plate streams, it estimated that 40-50% of the inbound material can be recovered by SMI and sold to commercial customers who purchase the recycled glass. SMI mainly supplies recycled glass to the fiberglass market from the Midlothian facility.

Inbound waste bottles are stored outdoors prior to processing and may contain food and beverage residues; therefore, these inbound wastes will be stored in leakproof covered bunkers. Processed combustible waste, including paper, plastic cardboard, and dust are collected from discharge points and then emptied into a leakproof landfill bunker, stored outside, under cover and which is equipped with a sprinkler system. Both outdoor storage areas will maintained in a manner to not constitute a fire, safety, or health hazard or provide food or harborage for animals and vectors, and shall not to result in litter. These bunkers are of sufficient size to contain all solid waste that the SMI generates in the period of time between collections. The inbound pre-processing waste bunker will be constructed to be leakproof, durable, and designed for safe handling and easy cleaning. The bunkers will be is turned over every 24-72 hours to allow for cleaning by front loaders, shovels and brooms.

The combustible waste and inbound wastes containing putrescible residues could be considered a constituent or characteristic that would be a limiting parameter impacting or influencing the design and operation of the facility. Waste storage capacity is limited based on the design capacity of the bunker. If design changes are required for registration or modification, those will be addressed in the future when needed. Additionally, combustible waste is picked up for disposal at the landfill every 24-72 hours. Waste acceptance procedures are discussed in Part I, Section 1.3.1 of this application. The design for this facility is based on a maximum rate of waste acceptance of 550 tons of waste per day. The maximum amount of generated waste to be stored at any point in time is 6,876 tons and total maximum quantity of material on-site is 20,000 tons.

least 50 to 68 trips per day. In no event will municipal solid waste be stored at the transfer station for longer than 72 hours. The Turkey Creek Landfill is closed on Sundays and on select holidays, as are many of the landfills in the region. The 72 hours of storage would allow for those times when the landfills are closed on Sunday with a holiday on the following Monday. Under non-holiday circumstances the longest time that municipal solid waste would be stored on-site would typically be from Friday afternoon to Monday morning (around 60 hours). At no time will the amount of stored waste exceed the ultimate capacity of the facility.

3.2.2 Intended Destination

Solid waste generated at the Strategic Materials Facility will be loaded onto transport trailers and typically driven to Turkey Creek Landfill (RN100825462), located at 9100 I-35W, Alvarado, TX which is approximately 22 miles southwest of the facility. Alternatively, waste from the Strategic Materials Facility may be transferred to a TCEQ authorized landfill facility within 50-miles.

3.3 Waste Characteristics [30 TAC §330.61(b)(1)]

3.3.1 Accepted Wastes

The Strategic Materials Facility may accept for storage and processing the following wastes not otherwise prohibited at the facility or at the receiving landfill disposal facility: unprocessed mixed glass. This is received as whole bottle stream, clear plate and mixed window plate streams and which can include non-glass materials that are non-recyclable, nonreusable, or combustible wastes. Metals are sent offsite for recycling as scrap metal; other materials are removed as trash and transported offsite. Combustible waste includes paper, plastic cardboard, and dust. Non-recyclable materials that are not considered combustible waste are ceramic waste. Both combustible waste and ceramic waste are transported to landfill for disposal.

Inbound waste bottles are stored outdoors prior to processing and may contain food and beverage residues; therefore, these inbound wastes will be stored in leakproof covered bunkers. Processed combustible waste, including paper, plastic cardboard, and dust are collected from discharge points and then emptied into a leakproof landfill bunker, stored outside, under cover and which is equipped with a sprinkler system. Both outdoor storage areas will be maintained in a manner to not constitute a fire, safety, or health hazard or provide food or harborage for animals and vectors, and shall not result in litter. These bunkers are of sufficient size to contain all solid waste that the SMI generates in the period of time between collections. The inbound pre-processing waste bunker will be constructed to be leakproof, durable, and designed for safe handling and easy cleaning. The bunkers will be turned over every 24-72 hours to allow for cleaning by front loaders, shovels and brooms.

The combustible waste and inbound wastes containing putrescible residues could be considered a constituent or characteristic that would be a limiting parameter impacting or influencing the design and operation of the facility. Waste storage capacity is limited based on the design capacity of the bunker. If design changes are required for registration or modification, those will be addressed in the future when needed. Additionally, combustible waste is picked up for disposal at the landfill every 24-72 hours. Waste acceptance procedures are discussed in Part I, Section 1.3.1 of this application.

PART IV
SITE OPERATING PLAN

STRATEGIC MATERIALS FACILITY

MSW Registration Number 40342

Midlothian, Ellis County, Texas

Prepared For:
STRATEGIC MATERIAL, INC.

Rev. 2

Date Prepared: September 17, 2024

Revision Date: 9/4/2025

Prepared By:
ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

9/4/2025

Texas Engineering Registration No. F-10131

Declarations

The combustible waste and inbound wastes containing putrescible residues could be considered a constituent or characteristic that would be a limiting parameter impacting or influencing the design and operation of the facility. Waste storage capacity is limited based on the design capacity of the bunker. If design changes are required for registration or modification, those will be addressed in the future when needed. Additionally, combustible waste is picked up for disposal at the landfill every 24-72 hours. Waste acceptance procedures are discussed in Part I, Section 1.3.1 of this application.

Recycling separation done at the Strategic Materials Facility will first separate and remove non-glass materials such as plastic, paper, cardboard, and metals for offsite waste disposal or recycling. Mixed glass is then processed into three (3) glass colors (amber, clear, and green) by an Optical Sort Line process.

Trees will not be accepted for disposal or recycling.

The Strategic Materials Facility will primarily receive waste from eight (8) separate counties within Texas and two (2) cities within Oklahoma.

A maximum of 550 tons per day of waste will be received at the site for subsequent storage and processing. The maximum amount of generated waste to be stored at any point in time is 6,876 tons and total maximum quantity of material on-site is 20,000 tons. The maximum and average lengths of time for inbound mixed glass waste streams to be processed and sold to customers is 1 day to 4 days. Wastes generated as part of the processing will remain at the facility for 24-72 hours or less.

The 30 TAC §330.9(e)(I) recycling requirement of at least 10 percent will be assured by comparing, on an annual basis, the total weight or weight equivalent of the processed mixed glass waste stream compared to the total weight or weight equivalent of glass recovered and sold by SMI to customers.

3.2 Receipt of Industrial Waste

Class I, 2 and 3 industrial wastes will not be accepted at the Strategic Materials Facility.

3.3 Receipt of Special Waste

Special Wastes (per 30 TAC §330.3) will not be accepted at the Strategic Materials Facility.

3.4 Prohibited Wastes

The Strategic Materials Facility may not accept the storage or processing of various wastes, including:

7.3 Fire Equipment [30 TAC §330.221(b)]

The facility will be equipped with fire extinguishers of a type, size, location, and number as recommended by the local fire department. Each fire extinguisher will be fully charged and ready for use at all times. Each extinguisher will be inspected on a routine monthly basis and recharged as necessary. A qualified service company will perform these inspections, and all extinguishers will display a current inspection tag. Inspection and recharging will be performed following each use. The receiving gatehouse, and all waste management equipment and vehicles will be equipped with fully charged fire extinguishers.

Processed combustible waste storage area (TRASHP), including paper, plastic cardboard, and dust are collected from discharge points and then emptied into a leakproof landfill bunker, stored outside, under cover and which is equipped with a sprinkler system.

7.4 Fire Protection Plan [30 TAC §330.221(c)]

7.4.1 Fire Protection Source and Procedures

Staff will take the following steps if a fire is discovered:

- Contact the Midlothian Fire Department by calling 911. Alert other facility personnel.
- Assess the extent of the fire, possibilities for the fire to spread, and alternatives for extinguishing the fire. If it appears that the fire can be safely fought with available firefighting devices until arrival of the Midlothian Fire Department, attempts to contain or extinguish the fire will be made.
- Notify the City of Midlothian Public Works Director or appointed representative of the situation and that the Fire Department has been contacted.
- Upon arrival of the Midlothian Fire Department personnel, direct them to the fire and provide assistance as appropriate.
- Do not attempt to fight the fire alone. Do not attempt to fight the fire without adequate personal protective equipment. Be familiar with the use and limitations of firefighting equipment available onsite.

7.4.2 Fire Fighting Methods

Firefighting methods for burning solid waste include smothering the waste, separating burning material from other waste, or spraying with water if available from an on-site water hose(s) supplied with water from the water utility. Processed combustible waste storage area (TRASHP) will be in a leakproof landfill bunker, stored outside, under cover and which is equipped with a sprinkler system. Small fires might be controlled with hand-held extinguishers.

If a fire occurs on a vehicle or piece of equipment, the equipment operator will bring the vehicle or equipment to a safe stop. If safety of personnel will allow, the vehicle will be parked away from fuel supplies, uncovered solid wastes, and other vehicles. The engine will be shut off and the brake engaged to prevent movement of the vehicle or piece of equipment.

7.4.3 Fire Protection Training

Training of on-site personnel in firefighting techniques, fire prevention, response, and the fire protection aspects of the SOP will be provided, by established professionals, on an annual basis.