



Texas Commission on Environmental Quality

Waste Permits Division Correspondence

Cover Sheet

Date: 1/12/2026
 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:	



January 12, 2026

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 4 (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 4 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 4

No.	Page	Citation	Checklist Item	NOD Description	NOD Type	Revision Request	Response
1	Page 19-20, 77-78, 222	30 TAC §330.61(b)(1) ; 30 TAC §330.203(a); 30 TAC §330.3	Waste Acceptance & Site Operating Plan	Language describing the acceptance of wastes from other states located in application (Section D of the Public Involvement Plan Form TCEQ-20960; Part 1, 1.1 General Description; 1.3 Capacity Acceptance...) state that waste generated outside the boundaries of Texas will be accepted. This language conflicts with the language in Part II 3.3.2 Prohibited Waste, stating that wastes generated outside the boundaries of Texas are prohibited.	Inconsistent	Please clarify if the facility will accept waste from outside the state of Texas, and correct the entirety of the application for consistency.	See Part I, Section 1.3.2; Part II, Section 3.3.2; Part IV, Section 3.4 Revised text to clarify that special waste as defined in 30 TAC 330.3(154) will not be accepted from outside the State of Texas.
2	Page 234, 237, 238	30 TAC §330.227, 30 TAC §330.237, 30 TAC §330.243	Site Operating Plan	Part II, Section 1.4.3, Spill Control, states that "The Strategic Materials facility does not generate or store process wastewater." Many other sections of the application also state that "No washing activities will occur." This language conflicts with language in Part IV, SOP, Section 9.2, Spill Prevention, that states "Wash water will be kept within the building and discharged through sloping floors with a direct connection to an on-site holding tank and a future connection to the City of Midlothian sanitary sewer." There is also additional conflictive language in Section 13, Sanitation [30 TAC §330.243] states that "All working surfaces that come in contact with wastes will be washed down at least once a week...wash waters will not be allowed to accumulate on-site without proper treatment...All wash water and contaminated water will be directed to the above ground holding tank, from which it will be removed on an as needed basis by a licensed liquid waste hauler."	Inconsistent	The SMI application must clearly elaborate how any wash waters (process and/or cleaning) will be generated, collected, stored and disposed. The SMI application must consistently specify how the handling of wash waters is to satisfy the 30 TAC requirements. Please review and correct the entire application for consistency concerning process wash waters and cleaning wash waters.	See Part IV, Section 9.2; Part IV, Section 12.3; Part IV, Section 13 Revised text to clarify no washing will occur of any kind at the facility, except in the event of final facility closure (Page 190). No process wash water or waste waters generated. Any stormwater that may pool within the sloped covered waste storage bunkers due to high intensity storm events will be immediately collected by vacuum truck and transported off-site to the local POTW for management.

No.	Page	Citation	Checklist Item	NOD Description	NOD Type	Revision Request	Response
3	Page 189	30 TAC §330.63(h), 30 TAC §330.459, 30 TAC Subchapter K, and 30 TAC §330.465(b)	Closure Plan & Closure Plan for Processing Facilities	Attachment III-2, Closure Plan, Page 188, states SMI may conduct closure activities, "Closure will be accomplished by SMI or a designated third-party contractor..." The Closure Cost Estimate must provide costs for a third party to conduct all closure activities. 30 TAC §330.505(a)(2)(B). The closure costs cannot assume that SMI will be doing any closure activities.	Inconsistent	Please clarify/amend the application to provide for the closure to be conducted by an independent third-party.	See Attachment III-3.1 Revised text to clarify that only a third party will conduct closure activities.
4	Page 21	30 TAC §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 continues to work towards resolution and met with city leadership on 8/25/25, 9/22/2025 (re-scheduled from 9/15/2025), 10/20/2025, 12/1/2025, 12/18/2025 and is scheduled to meet with the mayor, two council members and city leadership on 1/13/2026 . Actions taken have included researching the history of the site, including annexation date(s) and site operations, as well, as discussions relating to SMI's pending Type V registration application to inform and aid city leadership in evaluation of the zoning table use designations proposed and resulting SUP that would be required.</p>

40342 Strategic Materials - NOD 4

No.	Page	Citation	Checklist Item	NOD Description	NOD Type	Revision Request	Response
5	Page 16, 17, 52, 235	30 TAC §330.229	Site Operating Plan	Please clarify the waste acceptance and facility operating hours, as these are different in the Plain Language Summary and the application.	Inconsistent	Revise the hours to be consistent throughout all parts and forms included within the application.	<p>See Attachment I-1, Section 1.1 (General Description), Attachment I-8 (Plain Language Summary), and Part IV, Section 10 (Facility Operating Hours)</p> <p>Revised text to clarify waste acceptance and facility operating hours.</p>



MSW TYPE V RECYCLING and RECOVERY REGISTRATION APPLICATION

STRATEGIC MATERIALS

3240 Robinson Road

Midlothian, Ellis County, Texas

DATE: JANUARY 12, 2026

PROJECT: 19-0502-008

DOC NO.: REP-19-0502-008 Rev 3

Application No: 40342

PREPARED FOR:

Strategic Materials, Inc. (SMI)

3240 Robinson Road

Midlothian, TX 76065

RN 102563152

CN600418008

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1/12/2026

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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"/>
3	NOD 4 Response	1/12/2026	Mallory Holzworth	<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"/>

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Amanda Marcks

1/12/2026

PART I

STRATEGIC MATERIALS FACILITY

MSW Registration Number 40342

Midlothian, Ellis County, Texas

Prepared For:

STRATEGIC MATERIAL, INC.

Rev. 3

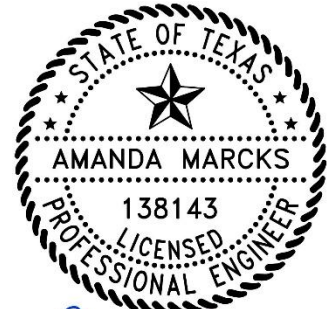
Date Prepared: September 17, 2024

Revision Date: 1/12/2026

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

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-instr¹. 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: 1/12/26

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: Bloomsburg County: Columbia State: PA Zip Code: 17815
Phone Number: 570-238-5232
Email Address: zach.aucker@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: 215 N 8th Street
City: Midlothian County: Ellis State: TX Zip Code: 76065
Phone Number: 972-775-7101
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: 215 N 8th Street
City: Midlothian County: Ellis State: TX Zip Code: 76065
Phone Number: 972-775-7195
Email Address: chris.dick@midlothian.tx.us

County Judge Information

County Judge's Name: John Wray
Mailing Address: 101 W Main Street - Suite 104
City: Waxahachie County: Ellis State: TX Zip Code: 75165
Phone Number: 972-825-5011
Email Address: countyjudge@elliscountytexas.gov

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: 76018

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: Todd Little

COG Representative's Title: Executive Director

Mailing Address: 616 Six Flags Dr

City: Arlington County: Tarrant State: TX Zip Code: 76005

Phone Number: 817-695-9101

Email Address: tlittle@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:

☐ Albuquerque, NM

☐ Galveston, TX

☒ Fort Worth, TX

☐ Tulsa, OK

PAGE REVISION DATE: 9/17/24 - initial

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.

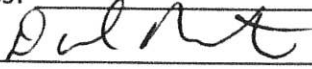
Applicant Signature Page

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: 1/5/26

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 Daniel Prophater

On this 5th day of January, 2026

My commission expires on the 12th day of January, 2026

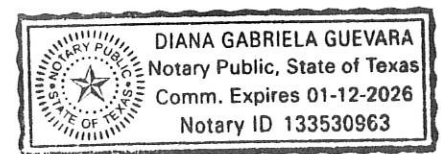
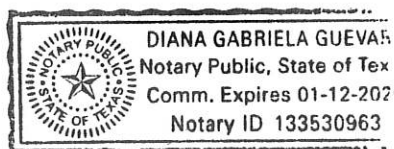
Diana Guevara

Notary Public in and for

State of 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: *Dan Prophater* Date: 1/8/26

Notary

SUBSCRIBED AND SWORN to before me by the said Daniel Prophater

On this 8th day of January, 2026

My commission expires on the 12th day of January, 2026

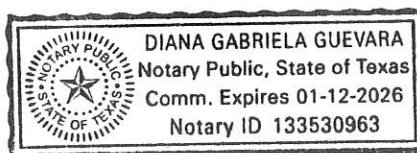
Diana Guevara

Notary Public in and for

State of Texas (notary's jurisdiction, including county and state)

Note: Application Must Bear Signature & Seal of Notary Public

RAA



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-10400 ⁶ [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

ATTACHMENT I-1
SUPPLEMENTARY TECHNICAL REPORT
[30 TAC §305.45(A) (8)]

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: 1/12/2026

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131

1.1 General Description

This Supplementary Technical Report has been prepared in accordance with 30 TAC §305.45(a)(8) for the proposed Strategic Materials, Inc (SMI) Type V facility, located in Ellis County within the incorporated city limits of the City of Midlothian, Texas.

The site of the Strategic Materials Facility consists of an 11.00-acre property located within the incorporated limits of the City of Midlothian on Robinson Road. The site entrance driveway is located along Robinson Road. 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.

The SMI Type V Transfer station facility is proposing to accept waste between the hours of 7:30 a.m. to 5:00 p.m. (Monday through Saturday). The peak hours of inbound and outbound trucks within and around the site are 9:00 a.m. to 11:00 a.m. (Monday through Saturday). Operating hours for on site equipment may extend up to 24 hours per day, from 12:00 a.m. through 11:59 p.m., over three shifts (Monday through Saturday). These hours of operations will allow for efficient waste collection and transfer before the peak morning traffic hours, accommodate timely processing of material, control odor and prevent off-site wind-blown debris. Other operations that do not require the use of heavy equipment (i.e., administrative, security, general facility maintenance) can occur at any time.

1.2 Description of Waste

The Strategic Materials Facility will accept from a Materials Recovery Facility (MRF) and currently provides collection and recycling service to 30 commercial suppliers and 40 residential suppliers. Materials received are mixed glass waste for recycling. This is received as a mix of whole plate glass and whole bottle glass. which can include non-glass materials that are non-recyclable, nonreusable, or combustible wastes. 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.

1.3 Capacity and Waste Acceptance

The Strategic Materials Facility collects 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. Due to population growth and recent residential development in the area, they anticipate that their number of clients will increase rapidly.

The Strategic Materials Facility is currently designed to accommodate 550 tons of inbound recyclable waste per day and anticipates approximately 50 transfer trucks will enter the facility per day. All generated waste from the processing operations are trucked to

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 §330.3(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*
 - k. drugs, contaminated foods, or contaminated beverages*
 - l. containers for pesticides, herbicides, fungicides, or rodenticides unless managed per 30 TAC §330.17 I(c)(5)(A)*
 - m. discarded materials containing asbestos*
 - n. incinerator ash*
 - o. soil contaminated by petroleum products*
 - p. used oil*
 - q. used-oil filters*
 - r. waste from oil, gas, and geothermal activities*
 - s. waste generated outside the boundaries of Texas which contain:*
 - i. any industrial waste;*
 - ii. any waste associated with oil, gas, and geothermal exploration, production, or development activities; or*
 - iii. any item listed as a special waste in 30 TAC §330.3(154) ;*
3. *The following wastes:*
- a. medical waste*
 - b. large, heavy, or bulky items which can include, but are not limited to, white goods (household appliances), air conditioner units, metal tanks, large metal pieces, automobiles, and other items that will not fit in the transfer trailer box.*

1.3.3 Measures for Controlling Prohibited Wastes

Procedures to detect and control the receipt of prohibited wastes include:

Procedures will be in place that call for all customers (both regular and one-time or occasional) and drivers of incoming waste hauling vehicles that have indicated they will deliver waste to the facility to be informed by: (1) Posting signs at the facility listing prohibited wastes; and (2) Providing all customers, vehicle drivers and transfer station operators with a written list of prohibited wastes.

Facility operations personnel will be trained to inspect vehicles and identify regulated hazardous waste, polychlorinated biphenyl (PCB) waste, and other prohibited wastes. At a minimum, the facility supervisor and staff will be trained in inspection procedures for prohibited waste. Records of employee training on prohibited waste control procedures will be maintained in the facility operating record. The personnel will be trained to be vigilant for the following indications of prohibited waste:

- 1. Yellow hazardous waste or PCB labels
- 2. DOT hazard placards and/or markings
- 3. Liquids

approved backup storage, processing, or disposal facility. If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harborage of vectors, steps will be taken to remove the accumulated solid waste from the facility to SMI's storage and processing disposal facility located in Houston, TX.

1.4.3 Spill Control

The facility does not generate or store wash water as the facility processes do not include the washing of materials or equipment, therefore the facility design does not require specific spill control measures for wash water operations. Stormwater runoff is authorized under MSGP (Permit TXR05DE60). The site is graded and drains to a single outfall. Prior to the outfall, a vegetative swale with rock check dams and additional filtration controls has been constructed so that stormwater runoff enters this drainage feature for filtration prior to discharging off site. The facility has not had an exceedance in stormwater benchmarks. Regulated housekeeping within the Stormwater Pollution Prevention Plan calls for the cleanup of debris and the plan includes procedures for the response and clean-up of any spills.

The facility will be designed to control and contain a worst-case spill or release. No contaminated water will be allowed to pond or run off as surface drainage. Covered bunkered areas at the facility are sloped and designed to control storm water from leaving the transfer station facility. Any stormwater that may pool within the sloped covered waste storage bunkers due to high intensity storm events will be immediately collected by vacuum truck and transported off-site to the local POTW for management. Process wastewater is not generated from the operation of the transfer station and stormwater runoff is controlled in a manner that will not cause surface water or groundwater pollution. Employee restrooms are located at the office and connected to the City of Midlothian sanitary sewer.

1.4.4 Property Location Considerations

The Strategic Materials facility property is located within the city limits of the City of Midlothian. The City of Midlothian has stated that with the Type V Registration application, the proposed use most closely matches the "Bulk Storage Facility/Truck Storage or Transfer Use" description type under "Commercial" category within zoning tables. This use type would require a Special Use Permit (SUP) under MI zoning. Midlothian Ordinance 2.02 requires the Planning & Zoning Commission to make the determination as to the appropriate classification of new or unlisted uses. 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. SMI will comply with the zoning requirements, including any need for a SUP, based on the findings of the Planning and Zoning Commission classification of use according to Midlothian City Ordinance on zoning. No portion of the property of the facility is in the 100-Year floodplain. The existing drainage patterns will be maintained. No wetlands threatened or endangered species, or cultural resources were identified within the proposed property boundary by qualified Site investigations. There were no oil/gas wells identified within the facility boundary or water wells within 500-feet of the Strategic Materials Facility property boundary.

ATTACHMENT I-5
VERIFICATION OF LEGAL STATUS / LEGAL AUTHORITY
[30 TAC §330.59(E)]

STRATEGIC MATERIALS FACILITY
MSW Registration Number 40342
Midlothian, Ellis County, Texas

Prepared For:
STRATEGIC MATERIAL, INC.

Rev. 1

Date Prepared: September 17, 2024

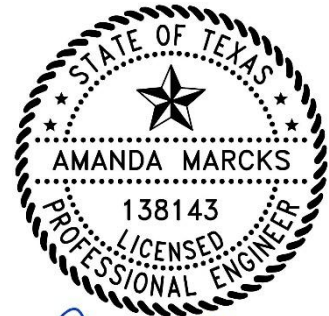
Revision Date: 1/12/2026

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449

Texas Engineering Registration No. F-10131



Amanda Marcks

1/12/2026

1.1 Discussion

Verification of Legal Authority, pursuant to 30 TAC §330.59(e), the owner and operator of the Strategic Materials facility is providing verification of legal status. Strategic Materials, Inc. dba Sibelco (Strategic Materials, Inc.) will be the sole owner/operator of the facility.



Office of the Secretary of State
Corporations Section
P.O. Box 13697
Austin, Texas 78711-3697
(Form 503)

Filed in the Office of the
Secretary of State of Texas
Filing #: 8585306 4/28/2025
Document #: 1475779310005
Image Generated Electronically
for Web Filing

**ASSUMED NAME CERTIFICATE
FOR FILING WITH THE SECRETARY OF STATE**

1. The assumed name under which the business or professional service is or is to be conducted or rendered is:

Sibelco

2. The name of the entity as stated in its certificate of formation, application for registration, or comparable document is:

STRATEGIC MATERIALS, INC.

3. The state, country, or other jurisdiction under the laws of which it was incorporated, organized or associated is **DELAWARE, USA**

4. The period, not to exceed 10 years, during which the assumed name will be used is : **10 year(s)**

5. The entity is a : **Foreign For-Profit Corporation**

6. The entity's principal office address is:

17220 Katy Freeway Suite 150, Houston, TX, USA 77094

7. The county or counties where business or professional services are being or are to be conducted or rendered under such assumed name are:

ALL COUNTIES

8. The undersigned, if acting in the capacity of an attorney-in-fact of the entity, certifies that the entity has duly authorized the attorney-in-fact in writing to execute this document. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument.

STRATEGIC MATERIALS, INC.

Name of the entity

By: **Julie Harris, VP Legal**

Signature of officer, general partner, manager,
representative or attorney-in-fact of the entity

FILING OFFICE COPY

ATTACHMENT I-6
EVIDENCE OF COMPETENCY
[30 TAC §330.59(F)]

STRATEGIC MATERIALS FACILITY
MSW Registration Number 40342
Midlothian, Ellis County, Texas

Prepared For:
STRATEGIC MATERIAL, INC.

Rev. 1

Date Prepared: September 17, 2024

Revision Date: 1/12/2026

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2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131

1.1 SMI Solid Waste Sites

The information in this attachment is provided in compliance with 30 TAC §330.59(f) as applicable to the facility type for which this application is submitted:

The facility will be owned and operated by Strategic Materials, Inc dba Sibelco (SMI). SMI is a Delaware Corporation qualified to do business in Texas. There are no MSW registered/permitted facilities owned/operated by SMI in Texas. A list of solid waste sites in all states, territories, or counties that are operated by SMI are provided in Attachment I-6.

1.2 SMI Key Personnel

The key personnel involved in the management and operations of SMI, Strategic Material Facility are:

Raul Valdes, Plant Manager, Strategic Materials Facility

Experienced Plant and Operations Leader with 20+ years of global manufacturing leadership across automotive, heavy machinery, glass, and industrial components in the U.S., Mexico, China, and Germany. Proven track record building and scaling operations—from greenfield plant launches to high-volume automated facilities—while holding full P&L responsibility. Experience in lean manufacturing, Toyota Production System, and continuous improvement within both high-volume/low-mix and low-volume/high-mix environments. Demonstrated success driving productivity gains, cost reduction, and on-time delivery through strategic CAPEX, automation, and process optimization. Adept at leading large, cross-functional, and unionized teams while strengthening safety, quality, and labor relations. Strong technical background in manufacturing engineering, tooling, automation, and ERP/MRP systems. Known for hands-on leadership, structured problem solving, and developing high-performing teams. Bilingual in English and Spanish, with deep experience operating in multicultural environments.

1.3 Equipment

The equipment listed in Part IV, Site Operating Plan - Section 2.2 will be used to operate this Site. Additional or different units of equipment may be provided as necessary to enhance operational efficiency. Other equivalent types of equipment may be substituted for this equipment on an as-needed basis.

ATTACHMENT I-7
CORE DATA FORM(S)
[30 TAC §281.5(7)]

STRATEGIC MATERIALS FACILITY
MSW Registration Number 40342
Midlothian, Ellis County, Texas

Prepared For:
STRATEGIC MATERIAL, INC.

Rev. 1

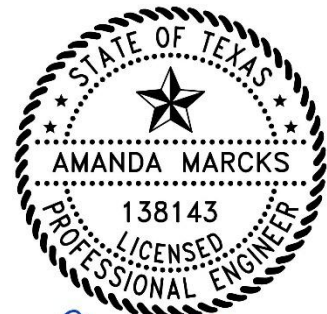
Date Prepared: September 17, 2024

Revision Date: 1/12/2026

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input checked="" type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)		<input type="checkbox"/> Other
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 6004180		RN 102563152

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)							
<input type="checkbox"/> New Customer <input checked="" type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership									
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)									
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>									
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)				<i>If new Customer, enter previous Customer below:</i>					
Strategic Materials, Inc.									
7. TX SOS/CPA Filing Number		8. TX State Tax ID (11 digits)		9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)				
8585306		17602971164		760297116	968370424				
11. Type of Customer:		<input checked="" type="checkbox"/> Corporation		<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited				
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other		<input type="checkbox"/> Sole Proprietorship		<input type="checkbox"/> Other:					
12. Number of Employees				13. Independently Owned and Operated?					
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following									
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other:									
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant									
15. Mailing Address:		1856 Old Berwick Rd							
City		Bloomsburg		State	PA	ZIP	17815	ZIP + 4	
16. Country Mailing Information (if outside USA)					17. E-Mail Address (if applicable)				
					zach.aucker@sibelco.com				
18. Telephone Number				19. Extension or Code		20. Fax Number (if applicable)			

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected, a new permit application is also required.)

☐ New Regulated Entity ☐ Update to Regulated Entity Name ☒ Update to Regulated Entity Information

The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).

22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)

Strategic Materials

23. Street Address of the Regulated Entity:

(No PO Boxes)

3240 Robinson Road

City

Midlothian

State

TX

ZIP

76065

ZIP + 4

24. County

Ellis

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:

26. Nearest City

State

Nearest ZIP Code

Midlothian

TX

76065

Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).

27. Latitude (N) In Decimal:

32.470203

28. Longitude (W) In Decimal:

-96.954755

Degrees

Minutes

Seconds

Degrees

Minutes

Seconds

29. Primary SIC Code

(4 digits)

30. Secondary SIC Code

(4 digits)

31. Primary NAICS Code

(5 or 6 digits)

32. Secondary NAICS Code

(5 or 6 digits)

5093

33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)

Glass Reclamation

34. Mailing Address:

3240 Robinson Road

City

Midlothian

State

TX

ZIP

76065

ZIP + 4

35. E-Mail Address:

joe.brown@sibelco.com

36. Telephone Number

37. Extension or Code

38. Fax Number (if applicable)

(972) 723-2422

() -

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

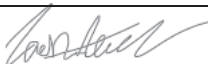
<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input type="checkbox"/> Industrial Hazardous Waste
<input checked="" type="checkbox"/> Municipal Solid Waste	<input checked="" type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
Type V Registration				
<input type="checkbox"/> Sludge	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

SECTION IV: Preparer Information

40. Name:	Amanda Marcks		41. Title:	Consultant
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address	
(940) 440-2435		() -	amarcks@esepartners.com	

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Sibelco	Job Title:	Environmental Compliance Manager
Name (In Print):	Zach Aucker	Phone:	() -
Signature:		Date:	1/9/2026

ATTACHMENT I-8
PLAIN LANGUAGE SUMMARY FORM
[30 TAC §39.405(K)]

STRATEGIC MATERIALS FACILITY
MSW Registration Number 40342
Midlothian, Ellis County, Texas

Prepared For:
STRATEGIC MATERIAL, INC.

Rev. 1

Date Prepared: September 17, 2024

Revision Date: 1/12/2026

Prepared By:
ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131



Texas Commission on Environmental Quality Plain Language Summary of Municipal Solid Waste Permit or Permit Amendment Application

Applicants are required by public notice rules in Title 30 Texas Administrative Code, Chapter 39, Section [39.405\(k\)](#)¹ to provide this summary of an application.

A. Purpose of the Proposed Facility

Strategic Materials Inc in Midlothian, Texas operates a glass recycling system which produces crushed/ground glass that is sorted into three colors (amber, clear and green) and sold as a product. The incoming raw material includes bottles and jars from recycling collection programs and plate glass manufacturing sites.

B. Information About the Applicant

Name: Strategic Materials Inc

Applicant Type: Type V Recycling and Recovery Registration

Facility Name: Strategic Materials

Permit Application Number: 40342

Customer Number (CN): CN600418008

Regulated Entity Reference Number (RN): RN102563152

C. Location of the Proposed Facility

Facility Address (or description of site location if no address):

3240 Robinson Road, Midlothian, TX 76065

Link to Map of Facility Location ([TCEQ Location Mapper](#)²): <https://arcg.is/u0C45>

D. Information about Facility Operation

What types of waste would be received?

The Strategic Materials facility sorts recyclable materials primarily in collection and acceptance of unprocessed mixed glass. This is received as a mix of whole plate glass and whole bottle glass, which can include non-glass materials that are non-recyclable, non-reusable, for example, metals, paper labels, cardboard, and plastics.

What geographical area would the wastes come from?

SMI collects recyclable materials from eight (8) separate counties within Texas, including Gregg, Smith, Dallas, Tarrant, Travis Bell, and Harris counties, and two (2) cities within Oklahoma.

¹ www.tceq.texas.gov/goto/view-30tac

² www.tceq.texas.gov/gis/hb-610-viewer

What days and hours would the facility operate?

The SMI facility is proposing to operate up to 24 hrs/day from 12:00 AM through 11:59 PM in 3 shifts and accept waste from 7:30 AM to 5 PM Monday through Saturday.

At what rate would wastes be accepted?

550 tons per day

How would wastes be managed?

There are on-site storage areas for unprocessed source-separated or recyclable materials. These storage areas are outdoors and are separate from the process area. The outdoor inbound pre-processing waste bunker will be constructed to be leak-proof, durable, and designed for safe handling and easy cleaning. Metals are stored in covered roll-off scrap metal bins. Separated paper, plastic, and cardboard are placed in waste bunker and are transported to an authorized landfill for disposal.

E. Pollution Control Methods

What methods would the facility use for containing wastes and odors, and monitoring for releases?

Measures include: deodorizing sprays, street sweeping, truck misting to prevent dust, misting system over bunkers to prevent dust, dust collectors at silos and loading operations, and good housekeeping practices. Waste will be stored in bunkers that are to be covered and enclosed on three sides to ensure trash and litter is not blown from the bunkers; and the bunkers are of sufficient size to contain all solid waste that the SMI generates in the period of time between collections. The stormwater outfall is monitored according to SMI's stormwater general permit to ensure pollutants are prevented from discharging from the property at levels above effluent limitations.

What methods would the facility use or require for preventing litter or spills, and for cleanup of litter and spills?

Windblown material and litter will be controlled through several methods, including proper unloading procedures, the use of portable litter control fences, perimeter fences, the orientation of the facility to the prevailing wind direction, landscaping, and adequate staffing. Personnel will police the facility, including fences, access roads, and the entrance gate, every operating day to pick up and return windblown material and litter to the facility and perform such other litter control measures, as necessary. Storage and processing areas have been designed to control and contain spills and stormwater water from leaving the facility based on a 25-year, 24-hour storm. Spill kits are readily available and accessible at facility.

PART II

STRATEGIC MATERIALS FACILITY

MSW Registration Number 40342

Midlothian, Ellis County, Texas

Prepared For:

STRATEGIC MATERIAL, INC.

Rev. 3

Date Prepared: September 17, 2024

Revision Date: 1/12/2026

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131

3.3.2 Prohibited Wastes

The Strategic Materials Facility may not except for 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:
 - lead acid storage batteries
 - whole used or scrap tires
 - refrigerators, freezers, air conditioners, and other items containing chlorinated fluorocarbon
 - liquid wastes
 - regulated hazardous wastes
 - polychlorinated biphenyls (PCB) wastes
 - radioactive materials
- 2) Special wastes defined/listed in 30 TAC §330.3(154), including various:
 - Hazardous waste from conditionally exempt small-quantity generators
 - Class 1 industrial nonhazardous waste
 - Treatment plant sludges
 - Septic tank pumpings
 - Grease and grit trap wastes
 - Treatment plant wastes
 - Air pollution control facility waste
 - Tanks, drums, or containers used for material listed as a hazardous constituent
 - Slaughterhouse wastes
 - Dead animals
 - Drugs, contaminated foods, or contaminated beverages
 - Containers for pesticides, herbicides, fungicides, or rodenticides unless managed per 30 TAC §330.171(c)(5)(A)

-
- Discarded materials containing asbestos
 - Incinerator ash
 - Soil contaminated by petroleum products
 - Used oil
 - Used-oil filters
 - Waste from oil, gas, and geothermal activities
 - Waste generated outside the boundaries of Texas which contain:
 - any industrial waste;
 - any waste associated with oil, gas, and geothermal exploration, production, or development activities; or
 - any item listed as a special waste in 30 TAC §330.3(154);

3) The following wastes:

- Medical waste
- Large, heavy, or bulky items which can include, but are not limited to, white goods (household appliances), air conditioner units, metal tanks, large metal pieces, automobiles, and other items that will not fit in the transfer box.

3.3.3 Waste Recovery

The facility will accept mixed glass waste from both residential and commercial suppliers that may contain nonrecyclable, nonreusable, and combustible, as described in Section 3.1. The Strategic Materials Facility will recover 10% or more by weight or weight equivalent of the total incoming waste stream for glass reuse or recycling, SMI will ensure that the incoming waste has already been reduced by at least 10% through a source-separation recycling program at the MRF. The Strategic Materials Facility has demonstrated the method that will be used to ensure that the 10% recovery requirement will be achieved in the following section.

3.3.4 Registration Qualifications [30 TAC §330.61(b)(2)]

The Strategic Materials Facility currently operates a pre-existing recycling facility, which accepts, sorts, and prepares glass material for further processing at other recycling facilities. SMI is seeking registration authorization from the Texas Commission on Environmental Quality (TCEQ) under 30 TAC §330.9(e) to continue recycling operations at the facility. A transfer station may be authorized by registration instead of a permit if it meets all criteria in 30 TAC §330.9(e).

The Strategic Materials Facility is located in the City of Midlothian, Ellis County, Texas. To ensure that the 10% recovery requirement set out in 30 TAC §330.9(e)(1) is achieved for

10.1.2 Existing Traffic Data

Based upon information from the operator, the proposed use is anticipated to generate approximately 156 vehicular trip ends per day, including 100 truck trip ends. [NOTE: each vehicle entry to or exit from the site at any driveway is considered a trip end.] Additional information is provided below:

- Hours of operation (waste acceptance): 7:30 AM – 5:00 PM (Monday-Saturday) [peak truck traffic period: 9:00-11:00 AM]
- Equipment operation (employee use only): any time Monday-Saturday (employees present 24 hours/day, over three work shifts)
- Number of daily employees: 28
- Transfer trucks per day: 50
- Other trips generated: Less than ten (10) equipment/supply deliveries per week (must enter and exit at the scale house on Robinson Road)
- Driveways: can be gated to prevent site access outside of hours of operation

10.1.3 Conclusions

Direct access to the site will primarily occur on Robinson Road with limited, secondary access (truck egress only) provided on Eastgate Road. Both roadways are public and provide ample excess roadway capacity. No improvements to the roadways are required to accommodate the trips generated by the proposed use.

The subject site is accessible from US 287 in Midlothian, Texas. Currently, US 287 operates well over the theoretical roadway capacity. However, the addition of frontage roads and the removal of at-grade intersections along US 287, which will significantly increase roadway capacity, is underway by the Texas Department of Transportation. The project to upgrade the corridor is scheduled to be let in 2028 pending funding availability. Upon completion, US 287 will provide surplus roadway capacity.

The proposed use is projected to generate approximately 156 trip ends (50 trucks generated and 28 employees generated) per day between 7:30 AM and 5:00 PM. The majority of employees will arrive at the site during the AM peak traffic period and depart during the PM peak traffic period. The majority of truck trips generated by the site will occur outside of the peak traffic hours.

10.2 Design Coordination

As this is an existing facility, there are no designed or proposed public roadway improvements such as turning lanes, storage lanes, etc., associated with the Site's entrances that would require coordination with the City of Midlothian Transportation Engineering Department. Documentation of coordination with Texas Department of Transportation (TxDOT) Dallas District Engineer is provided in Attachment II-6.

ATTACHMENT II-6
TRANSPORTATION

STRATEGIC MATERIALS FACILITY
MSW Registration Number 40342
Midlothian, Ellis County, Texas

Prepared For:
STRATEGIC MATERIAL, INC.

Rev. 1

Date Prepared: September 17, 2024

Revision Date: 1/12/2026

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131

Technical Memorandum

To: Amanda Marcks, P.E.
ESE Partners, LLC

From: Steve E. Stoner, P.E., PTOE
Westwood Professional Services, Inc.

Date: January 8, 2026

Subject: Strategic Materials, Inc. Transfer Station, 3240 Robinson Road, Midlothian, Ellis County, Texas—Traffic Volume Forecast for TCEQ Analysis
Westwood Project R0058263.00

BACKGROUND

The services of **Westwood Professional Services** (Westwood) were retained by ECE Partners, LLC to provide a traffic engineering study to address the following TCEQ requirements for the facility noted above:

- Provide data on the availability and adequacy of roads that the owner or operator will use to access the site;
- Provide data on the volume of vehicular traffic on access roads within one mile of the proposed facility, both existing and expected, during the expected life of the proposed facility; and
- Project the volume of traffic expected to be generated by the facility on the access roads within one mile of the proposed facility

Westwood is a licensed engineering firm providing traffic engineering and other professional services.

SITE ACCESSIBILITY REVIEW

A site location map and a site plan of the facility provided to Westwood by ECE Partners, LLC is contained at the end of this report. The subject site is bounded on the southwest by US 287 with approximately 1,200 feet of frontage, on the north by Robinson Road with approximately 1,000 feet of frontage, and on the east by Eastgate Road with approximately 750 feet of frontage. 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.

US 287 is a federal highway maintained by the Texas Department of Transportation (TxDOT) and is a designated truck route on the Texas Highway Freight Network. Currently, US 287 consists of two travel lanes in each direction separate by a 60-foot median. The posted speed limit is 55 miles per hour.

TxDOT is currently in the planning phase of three separate projects to install one-way, two-lane frontage roads along the several miles of US 287, which include the segment fronting the subject site. Under the current design, both Robinson Road and Eastgate Road are proposed to intersection the future northbound frontage road. A northbound-to-southbound turnaround (a.k.a., “Texas U-turn”) lane will be provided at a future grade-separated interchange approximately 900 feet north of Robinson Road, and a future southbound-to-northbound turnaround (“Texas U-turn”) lane will be provided at a future grade-separated interchange approximately 0.85 miles south of Eastgate Road. On- and off-ramps will be provided in both directions between the interchanges, which will be easily accessible from the subject site. The frontage road project is anticipated to be let by TxDOT in 2028 pending funding.

No other roadways within one mile of the site are anticipated to be used to access the facility.

TRAFFIC VOLUMES

Historical traffic volumes from the Texas Department of Transportation (TxDOT) Traffic Count Database System (TCDS) show that the traffic volumes on Robinson Road and Eastgate Road are approximately 2,000 vehicles per day. Surrounding properties accessing both streets are generally built out with low-density industrial/commercial buildings. No significant changes to the land uses along the roadways appear to have occurred in over ten years, and no significant changes or further development are apparent. Therefore, background traffic growth is considered negligible. Based on planning guidelines developed by the North Central Texas Council of Governments, two-lane local roadways in a commercial environment provide a daily volume capacity of approximately 9,500 vehicles per day, so both roadways utilize less than 25% of the theoretical daily capacity.

The recent TCDS traffic volume on US 287 is over 61,000 vehicles per day, which is significantly over the theoretical daily capacity of 37,000 vehicles per day. The corridor is also experiencing rapid growth of over ten percent per year, which has precipitated the planning for the addition of frontage roads and elimination of at-grade intersections within the corridor. After implementation of the proposed improvements, the traffic characteristics of the corridor will change significantly with regional traffic remaining on the main lanes and local traffic on the frontage roads. According to TxDOT planning studies, the projected traffic volumes on the future frontage roads at regional buildout are anticipated to utilize less than 50% of the available roadway capacity.

TRIP GENERATION

Based upon information from the operator, the proposed use is anticipated to generate approximately 156 vehicular trip ends per day, including 100 truck trip ends. [NOTE: each vehicle entry to or exit from the site at any driveway is considered a trip end.] Additional information is provided below:

- Hours of operation (waste acceptance): 7:30 AM – 5:00 PM (Monday-Saturday) [peak truck traffic period: 9:00-11:00 AM]
- Equipment operation (employee use only): any time Monday-Saturday (employees present 24 hours/day, over three work shifts)
- Number of daily employees: 28
- Transfer trucks per day: 50
- Other trips generated: Less than ten (10) equipment/supply deliveries per week (must enter and exit at the scale house on Robinson Road)
- Driveways: can be gated to prevent site access outside of hours of operation

CONCLUSIONS

Direct access to the site will primarily occur on Robinson Road with limited, secondary access (truck egress only) provided on Eastgate Road. Both roadways are public and provide ample excess roadway capacity. No improvements to the roadways are required to accommodate the trips generated by the proposed use.

The subject site is accessible from US 287 in Midlothian, Texas. Currently, US 287 operates well over the theoretical roadway capacity. However, the addition of frontage roads and the removal of at-grade intersections along US 287, which will significantly increase roadway capacity, is underway by the Texas Department of Transportation. The project to upgrade the corridor is scheduled to be let in 2028 pending funding availability. Upon completion, US 287 will provide surplus roadway capacity.

The proposed use is projected to generate approximately 156 trip ends (50 trucks generated and 28 employees generated) per day. The majority of trip generation will occur during the waste acceptance times (between 7:30 AM and 5:00 PM, Monday- Saturday), although the facility will be staffed 24 hours per day (Monday-Saturday) for potential equipment operation. The majority of truck trips generated by the site will occur outside of adjacent roadway peak traffic hours.

END OF MEMO



STRATEGIC MATERIALS, INC.
APPROXIMATELY ACRES
3240 ROBINSON ROAD
MIDLOTHIAN, ELLIS COUNTY, TEXAS

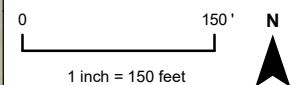
SITE TRAFFIC MAP

PROJECT NUMBER: 19-0502
FILE NAME: FIGURE_7_SITE_TRAFFIC
DATE: 8/28/2024
DRAWN BY: LS
APPROVED BY: AM



Projection: NAD 1983 StatePlane Texas North Central FIPS 4202 Feet
Source: Esri, Maxar, Earthstar Geographics, and the GIS User CommunitySource:

FIGURE II.7



PART III

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: 1/12/2026

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131

Restrooms will be provided at the office on the facility grounds for use by the employees and visitors. These restrooms will be directed to the City of Midlothian sanitary sewer connection.

2.10 Water Pollution Control [30 TAC §330.63(b)(4)]

The Strategic Materials Facility operations are exclusively indoors. Rain that comes in contact with materials stored outside properly drains to the stormwater vegetative swale where the water is then discharged off site through a permitted stormwater outfall. The facility does not have any sump systems. If ponding occurs under the scale after rainfall events, the water is pumped, and it is directed to the stormwater outfall. In general, the entirety of the property is sloped to discharge water through the stormwater system and the vegetative swale that was constructed in 2024.

No process wash water is generated by the facility because there is no washing of materials or equipment occurring at any time. Stormwater runoff is authorized under MSGP (TXR05DE60). Additionally, a vegetated swale with check dams has been installed to filter out potential contaminants prior to discharge off-Site through designated stormwater outfall(s).

The facility is appropriately sloped to prevent water from pooling near materials. However, there is one (1) area under the scale where ponding may occur during extreme rainfall events. In those rare cases, the water is pumped out and discharged into the stormwater drainage system.

The covered bunkered areas at the facility are above grade, sloped and designed to control storm water from leaving the transfer station facility. Any stormwater that may pool within the sloped covered waste storage bunkers due to high intensity storm events will be immediately collected by vacuum truck and transported off-site to the local POTW for management.

The Strategic Materials Facility includes a stormwater vegetated swale with check dams and additional filtration controls. All facility stormwater drainage structures and conveyance will be designed to comply with 30 TAC §330.303 which requires that it be constructed, maintained, and operated to manage run-on and runoff during the peak discharge of a 25-year rainfall event and must prevent the off-Site discharge of waste material.

The Strategic Materials Facility has existing coverage under the TPDES Multi Sector General Permit for Industrial Stormwater, permit #TXR05DE60. Stormwater samples are taken quarterly, and any exceedance is investigated. Once investigated, new controls or practices will be put in place to address the exceedance. The strategic materials facility has yet to have an exceedance in stormwater samples.

2.11 Endangered Species Protection [30 TAC §330.63(b)(5)]

Site-specific endangered and threatened species assessments were conducted by a qualified biologist for the Site. The assessment included a review of TPWD Rare, Threatened, and Endangered Species of Texas (RTEST) – Ellis County report and the USFWS Information Planning and Consultation (IPaC) report provided in Part II, Attachment II-13.

The project shall not result in the destruction or adverse modification of critical habitat or cause or contribute to the taking of endangered or threatened species. As such, the facility's continued operation does not jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of a critical habitat, protected under the

Endangered Species Act of 1973, or violate any requirement under the Marine protection, Research, & Sanctuaries Act.

3 SURFACE WATER DRAINAGE [30 TAC §330.63(C)]

In accordance with 30 TAC 330.303, a facility must be constructed, maintained, and operated to manage run-on and runoff during the peak discharge of a 25-year rainfall event and must prevent the off-site discharge of waste and feedstock material, including, but not limited to, in-process and/or processed materials.

- The Site will be graded so that all runoff is directed away from waste storage areas.
- The covered bunkered areas at the facility are above grade, sloped, and designed to control storm water from leaving the transfer station facility. Any stormwater that may pool within the sloped covered waste storage bunkers due to high intensity storm events will be immediately collected by vacuum truck and transported off-site to the local POTW for management.
- Surface water drainage in and around a facility shall be controlled to minimize surface water running onto, into, and off the processing areas.
- Drainage areas are graded to a vegetated swale with check dams.

All constructed Site improvements will be constructed, maintained, and operated to manage run-on and run-off during the peak discharge of a 25-year rainfall event. The improvements will be constructed, maintained, and operated to prevent the off-Site discharge of waste, in-process, or processed materials. Best management practices will be applied during construction to minimize erosion and reduce the potential for sediment to be transported to streams in the area.

The operator will not discharge contaminated water without specific written authorization.

3.1 Facility Surface Water Drainage Report [30 TAC §330.63(c)]

The Strategic Materials Facility does not contain landfill or compost units and so does not require a surface water drainage report.

4 WASTE MANAGEMENT UNIT DESIGN [30 TAC §330.63(D)]

4.1 Rapid Processing and Detention of Solid Waste [30 TAC §330.63(d)(1)(A)]

The Strategic Materials Facility has been designed for efficient processing and minimum detention of solid waste at the facility. The design capacity of the transfer station will not be exceeded during operation. The area to be used for waste transfer will not be exceeded during operation. The initial pre-clean line process sorts unprocessed mixed glass, which may include nonrecyclable, nonreusable, and combustible waste, and takes place outdoors in well ventilated, covered area. In this process, non-glass combustible materials such as plastic, paper, and cardboard, and non-combustible materials, such as metals and ceramics, are removed. Metals are sent offsite for recycling; other materials are removed as trash and as combustible waste. The additional sorting processes take place within buildings. The glass is processed in the Optical Sort Line which

dust on or near roadways, instillation of misting systems over bunkers also to prevent dust and installation of baghouse onsite. In addition, the turnover rate onsite prevents a buildup of materials enough to greatly minimize the threat of these issues. Additionally, the site has implemented a pest control program to monitor and control the harborage of animals around outdoor waste storage areas.

4.2.1 Spill Control [30 TAC §330.63(d)(1)(B)]

The Strategic Materials facility does not generate or store process wastewater. No material or equipment wash waters are generated. Any stormwater runoff will be directed to the on-site vegetated swale for filtration prior to discharge at the TPDES MSGP permitted Stormwater Outfall (permit #TXR05DE60). The vegetated swale is capable of handling peak discharge of a 25-year, 24-hour rainfall intensity storm. The covered bunkered areas at the facility are above grade, sloped, and designed to control storm water from leaving the transfer station facility. Any stormwater that may pool within the sloped covered waste storage bunkers due to high intensity storm events will be immediately collected by vacuum truck and transported off-site to the local POTW for management.

4.2.2 Maximum Allowable Storage Time [30 TAC §330.63(d)(1)(c)]

No municipal solid waste shall be stored at the transfer station longer than 72 hours prior to transport off-Site.

4.3 Incineration Units [30 TAC §330.63(d)(2)]

The Strategic Materials Facility will not be equipped with an incinerator and therefore this provision is not applicable for this facility.

4.4 Surface Impoundments [30 TAC §330.63(d)(3)]

The Strategic Materials Facility station will not utilize impoundments for the storage of wastes, therefore this provision is not applicable for this facility.

4.5 Landfill Units and Arid Landfill Exemptions [30 TAC §330.63(d)(6)]

These provisions are not applicable for Strategic Materials Facility.

4.6 Type V Mobile Liquid Waste Processing Units [30 TAC §330.63(d)(6)]

These provisions are not applicable for Strategic Materials Facility.

4.7 Type IX Energy, Material, Gas Recovery for Beneficial Use, or Landfill Mining Waste Processing Units [30 TAC §330.63(d)(7)]

These provisions are not applicable for Strategic Materials Facility.

ATTACHMENT III-3
CLOSURE 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: 1/12/2026

Prepared By:
ESE Partners, LLC

2002 West Grand Parkway North
Suite 140
Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131

CLOSURE PLAN

1 INTRODUCTION

This Closure Plan has been prepared pursuant to 30 TAC §330.63(h) and addresses the applicable provisions of 30 TAC §330.459, 30 TAC Subchapter K, and §330.465(b). The facility will be closed in accordance with the closure provisions of this registration, unless specifically authorized by the Executive Director of the Texas Commission of Environmental Quality (TCEQ).

Closure will be accomplished by a designated third-party contractor by removing all waste, waste residues, and any recovered materials. Facility units will either be dismantled and removed off-Site or decontaminated.

2 NOTIFICATION

In compliance with the requirements of 30 TAC §330.461(a), SMI or the operator shall provide public notice for final facility closure through a public notice in the newspaper of largest circulation in the vicinity of the facility no later than 90 days prior to the initiation of a final closure. The notice shall provide the name, address, physical location of the facility, permit number, and the last date of intended receipt of waste. An adequate number of copies of the approved final closure plan will be made available for public access and review.

SMI shall also provide written notification to the TCEQ Executive Director of the intent to close the facility and place this notice of intent in the operating record of the SOP. In accordance with 30 TAC §330.461(b), upon notification to the Executive Director, the owner or operator shall post a minimum of one (1) sign at the main entrance and all other frequently used points of access for the facility notifying all persons who may utilize the facility of the date of closing of the entire facility and the prohibition against further receipt of waste materials after the stated date. Suitable barriers shall be installed at all gates or access points to adequately prevent the unauthorized dumping of solid waste at the closed facility.

3 CLOSURE ACTIVITIES

The following actions will take place for closure:

- Notify TCEQ when closure is initiated.
- Closure activities for the facility will begin no later than 30 days after the date on which the facility receives the known final receipt of waste.
- A sign will be posted at the main entrance notifying all person who may utilize the facility of the date of closing and the prohibition against further receipt of waste materials after the stated date.
- Ensure the entire perimeter property boundary fence will adequately prevent the unauthorized dumping of solid waste at the closed facility.

PART IV
SITE OPERATING PLAN

STRATEGIC MATERIALS FACILITY

MSW Registration Number 40342

Midlothian, Ellis County, Texas

Prepared For:
STRATEGIC MATERIAL, INC.

Rev. 3

Date Prepared: September 17, 2024

Revision Date: 1/12/2026

Prepared By:

ESE Partners, LLC

2002 West Grand Parkway North
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Katy, TX 77449



Amanda Marcks

1/12/2026

Texas Engineering Registration No. F-10131

Plan, the Storm Water Pollution Prevention Plan and general health and safety procedures. Following the initial training, the new employee training will continue during monthly training sessions, during on-the-job training, and during the annual review of their initial training.

2.4.6 Training Meetings

Training meetings will be scheduled and conducted for all employees at least once per month. If a regular monthly meeting is cancelled, it will be rescheduled or combined with the scheduled training the next month. Training sessions will be scheduled to allow facility operations to be uninterrupted. Records of personnel attending each training session and the topics covered will be maintained at the facility. Topics for training may vary, but will be conducted annually for the following:

- Safety
- Fire protection, prevention, and education
- Fire extinguisher
- Emergency response
- Litter control and windblown waste pick-up
- Hazardous waste and PCB waste detection and control (waste screening), if applicable
- Prohibited waste management
- Random inspection procedures

2.4.7 Facility Personnel

Facility personnel will take part in an annual review of their initial training. A written description of the type and amount of introductory and continued training provided to each employee will be maintained in the facility operating record.

3 WASTE ACCEPTANCE AND ANALYSIS [30 TAC §330.203]

3.1 Authorized Wastes

The Strategic Materials facility may accept for the storage and processing of the following wastes not otherwise prohibited at the facility or at the receiving landfill disposal facility: mixed glass waste from both commercial and residential sources, which may include nonrecyclable, nonreusable, and combustible waste. 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 an authorized landfill for disposal.

Mixed glass waste specifically excludes any radioactive, volatile, corrosive, highly flammable, explosive, biomedical, infectious, biohazardous, toxic, universal, or hazardous material as defined by applicable federal, state, provincial, or local laws or regulations.

The facility will not accept or generate liquid wastes, sludge waste, or grit trap waste requiring effluent discharged to a trap, interceptor, or treatment facility permitted under Texas Water Code, Chapter 26. Therefore, no sampling and analysis plan per **330.203(c)** is required.

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 authorized 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)(1) recycling requirement of at least 10 percent will be assured by comparing, on an annual basis, the weight or weight equivalent of the total incoming 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 (as defined in 30 TAC §330.3(154)) 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:

(1) wastes prohibited from disposal in a municipal solid waste facility by 30 TAC §330.15(e), including various:

- lead acid storage batteries
- whole used or scrap tires
- refrigerators, freezers, air conditioners, and other items containing chlorinated fluorocarbon
- liquid wastes
- regulated hazardous wastes
- polychlorinated biphenyls (PCB) wastes
- radioactive materials

(2) special wastes defined/listed in 30 TAC §330.3(154), including various:

- hazardous waste from conditionally exempt small-quantity generators
- Class I industrial nonhazardous waste
- treatment plant sludges
- septic tank pumpings
- grease and grit trap wastes
- treatment plant wastes
- air pollution control facility waste
- tanks, drums, or containers used for material listed as a hazardous constituent
- slaughterhouse wastes
- dead animals
- drugs, contaminated foods, or contaminated beverages
- containers for pesticides, herbicides, fungicides, or rodenticides unless managed per 30 TAC §330.171(c)(5)(A)
- discarded materials containing asbestos
- incinerator ash
- soil contaminated by petroleum products
- used oil
- used oil filters
- waste from oil, gas, and geothermal activities- waste generated outside the boundaries of Texas which contain:
 - any industrial waste;
 - any waste associated with oil, gas, and geothermal exploration, production, or development activities; or
 - any item listed as a special waste in 30 TAC §330.3(154);

(3) the following wastes:

- medical waste
- large, heavy, or bulky items which can include, but are not limited to, white goods (household appliances), air conditioner units, metal tanks, large metal pieces, automobiles, and other items that will not fit in the transfer trailer box.

TRASHP	Trash Processed	Produced Internally	1,719
MIXBP8515P	Mixed Bottle Plate 85/15 Processed (85% bottle & 15% plate blend)	Produced Internally	1,719
MIXW	Mixed, Work In Progress	Produced Internally	172
MWPW	Mixed Window Plate, Work In Process	Produced Internally	34
MWPU	Mixed Window Plate-Unprocessed	30.68	516
MIXU	Mixed Unprocessed	17.8	258
STLP	Steel-Processed	Produced Internally	26
ALULGSP	Aluminum Low-Grade ALU Scrap-Processed	Produced Internally	34
OTHFINW	Other Fines Work In Process	Produced Internally	52

Table 5: Capacity Volumes and Time Limits

Waste Source	Total Inbound (TPD)	Average Processing Time Days	Max Storage Time Days
Mix	550	1	4

On an annual basis, SMI will compare the weight or weight equivalent of the total incoming waste stream (processed mixed glass) processed at the Strategic Materials Facility to the total weight or weight equivalent of materials recovered and sent for recycling. An example calculation is provided below in Table 6. SMI recovers glass for sale to supply fiberglass manufacturers out of Midlothian facility.

Table 6: 10% Recovery Example Calculation

Recovery January 2024 through June 2024		
Total Processed	Total Recovered	Recycling Performance %
61,745.47	29,195.00	47.3%

3.6 Facility-Generated Wastes [30 TAC §330.205]

Waste generated by the transfer station will be processed or disposed of at an authorized solid waste management facility. Nonrecyclable, nonreusable, and combustible waste may be included in the inbound mixed glass solid waste and are removed as part of the recovery process. 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 an authorized landfill for disposal.

both industrial and hazardous waste and their transportation and management requirements. The facility is not required to accept any solid waste that may cause problems in maintaining full and continuous compliance with the permit/registration.

Certain wastes are prohibited from management at the facility. Prohibited wastes are described in Section 3 of the Waste Acceptance and Analysis section of this Site Operating Plan. The unloading of prohibited wastes at the facility will not be allowed. The operator will take necessary steps to ensure compliance. Personnel have the authority and responsibility to reject unauthorized loads, have unauthorized material removed by the transporter, and/or assess appropriate surcharges, or have the unauthorized material removed by on-site personnel and otherwise properly managed by the facility. Any prohibited waste not discovered until after unloading will be placed back in the offending transporter's vehicle, if possible, or otherwise returned promptly to the transporter or generator of the waste. The driver may be advised where the waste may be managed or disposed of legally and will be responsible for the proper handling of this rejected waste.

In the event the unauthorized waste is not discovered until after the delivery vehicle is gone, the waste will be segregated and controlled as necessary. The manager/supervisor will make an effort to identify the entity that deposited the prohibited waste and have them return to the facility and properly dispose of the waste. In the event that identification is not possible, the manager/supervisor will notify the TCEQ and seek guidance on how to remove and dispose of the waste as soon as practical. A record of unauthorized material removal will be maintained in the operating record.

Only those persons operating vehicles that comply with the following requirements will be authorized by the manager/supervisor to transport waste to and from this facility:

1. All vehicles and equipment used for the collection and transportation of waste will be operated and maintained to prevent loss of waste material and to limit health and safety hazards to facility personnel and the public.
2. Collection vehicles and equipment will be maintained in a sanitary condition to preclude odors and fly breeding.
3. Collection vehicles not equipped with an enclosed transport body will use other devices such as nets or tarpaulins to preclude accidental spillage.

Facility personnel will keep watch for compliance with operating requirements. In addition, rules for waste receipt and prohibited waste will be prominently displayed on signs at the facility entrance.

9.2 Spill Prevention and Control [30 TAC §330.227]

Storage and processing areas have been designed to control and contain spills and stormwater from leaving the facility based on a 25-year, 24-hour storm. All waste transfer activities are conducted within the transfer station building. No process wash water is generated by the facility because there is no washing of materials or equipment occurring at any time. The covered bunkered areas at the facility are above grade, sloped, and designed to control storm water from leaving the transfer station facility. Any stormwater that may pool within the sloped covered waste storage bunkers due to high intensity storm events will be immediately collected by vacuum truck and transported off-site to the local POTW for management.

10 FACILITY OPERATING HOURS [30 TAC §330.229]

Facility operating hours are as follows:

- The regular waste acceptance hours (and transporting materials on- or off-site) will be 7:30 am to 5:00 pm, Monday through Saturday. Hours will be posted on a sign at the entrance to the facility.
- The operating hours for operating of equipment as described in Section 2.2 may extend up to 24 hours per day from 12:00 a.m. through 11:59 p.m., over three shifts Monday through Saturday.
- Other activities (e.g., administrative, security, general facility maintenance) can occur at any time.
- These hours of operations will allow for efficient waste collection and transfer before the peak morning traffic hours, accommodate timely processing of material, control odor and prevent off-site wind-blown debris. The waste acceptance hours will also spread out the facility traffic thereby reducing impacts during the peak traffic hours. Extended Saturday hours help commercial businesses that need waste collection on weekends and collections from residential customers who have limited access during the work week.
- The facility will normally be closed to the public on Sundays, Christmas Day, New Year's Day, and Thanksgiving Day, but will be available for operations staff six days a week, 52 weeks per year as necessary.

When warranted, the facility manager/supervisor will request approval from the commission's regional office to allow additional temporary operating hours to address disaster or other emergency situations, or other unforeseen circumstances (such as traffic delays or adverse weather) that could result in the disruption of waste management services in the area. The facility may include alternative operating hours for up to five days in a calendar-year period to accommodate special occasions, special purpose events, holidays, or other special occurrences. The facility manager/supervisor will document the reason or reasons for the delay for each day on which a delay occurs and place the documentation in the operating record.

11 FACILITY SIGN [30 TAC §330.231]

A conspicuous sign measuring a minimum of four feet by four feet will be maintained at the public entrance to the facility. The sign states, in letters at least three inches high, the following information:

Type of MSW Facility: Type V
Authorized by TCEQ Registration Number: MSW Registration No. 100540
Emergency 24-hour Contact Number: 262-581-7132
Local Emergency Fire Department Number: 911

The sign will be visible and readable from the facility entrance. The hours of operation will be according to the hours stated in Section 10 of this plan, Facility Operating Hours. The sign will also state that the following wastes (listed below) are prohibited from receipt at the facility.

- Regulated Hazardous waste
- Polychlorinated biphenyls (PCBs) wastes
- Lead acid storage batteries

-
- Special wastes defined/listed in 30 TAC §330.1543(154)
 - Whole used or scrap tires
 - Items containing chlorinated fluorocarbons (CFCs)
 - Used oil and used oil filters
 - Liquid wastes
 - Asbestos wastes
 - Large or bulky items

The above are prohibited as well as other wastes described in Subsection 3.4 of this plan, Prohibited Wastes.

Signs prohibiting smoking will be posted near the facility entrance or gatehouse.

A sign will be prominently displayed at the facility entrance stating that all loads will be properly covered or otherwise secured.

12 LITTER CONTROL MEASURES

12.1 Control of Windblown Material and Litter [30 TAC §330.233]

Windblown material and litter will be controlled through several methods, including proper unloading procedures, the use of portable litter control fences, perimeter fences, the orientation of the facility to the prevailing wind direction, landscaping, and adequate staffing. Personnel will police the facility, including fences, access roads, and the entrance gate, every operating day to pick up and return windblown material and litter to the facility and perform such other litter control measures, as necessary.

12.2 Materials along the Route of the Facility [30 TAC §330.235]

The facility operator will take steps to encourage that vehicles hauling waste to the facility are enclosed or provided with a tarpaulin, net, or other means to effectively secure the load in order to prevent the escape of any part of the load by blowing or spilling. The operator will take actions such as posting signs, reporting offenders to proper law enforcement officers, adding surcharges, or similar measures. On days when the facility is in operation, the operator will be responsible for at least once per day cleanup of waste materials spilled along and within the right-of-way of public access roads serving the facility for a distance of two (2) miles in either direction from any entrances used for the delivery of waste to the facility, consistent with 30 TAC §330.235.

12.3 Facility Access Roads [30 TAC §330.237]

The facility will abide by the following aspects regarding facility access roads:

Tracked mud and associated debris at the entrance to the facility and on the public roadway at the entrance to the facility and trash on public roadways will be removed at least once per day on days when mud and associated debris are being tracked onto the public roadway, to the extent that mud can be reasonably considered to be associated with facility operations. The facility will keep records to demonstrate compliance with the requirement.

Dust from on-site and other access roadways will not become a nuisance to surrounding areas. A water source and necessary equipment or other means of dust control approved by the TCEQ executive director will be provided.

Litter and any other debris on-site and other access roadways will be picked up at least daily and taken to the collection area.

Access roadways will be maintained to minimize depressions, ruts, and potholes.

For all-weather roads within the facility to the unloading area designated for wet- weather operation, the haul roads and access roads will be constructed with appropriate materials to provide all weather access. The facility will incorporate a paved facility entrance road.

Tracking of mud and trash onto public roadways will be minimized by the use of asphalt or concrete paved entrance, facility roads and internal roads. A City of Midlothian street sweeper will be used to remove tracked mud and associated debris from the facility entrance and nearby public roadways in the event that it appears that the mud has originated from the site.

Haul roads and access roads will be maintained in a reasonable dust-free condition by having asphalt-paved and concrete-paved interior roadways. All on-site and other access roadways will be maintained on a regular basis to minimize depressions, ruts, and potholes.

12.4 Noise Pollution and Visual Screening [30 TAC §330.239]

The transfer station is located in a non-residential area of Midlothian zoned for Medium Industrial (MI). The transfer station will conduct waste transfer activities within the transfer building to minimize potential noise pollution and adverse visual impacts. The transfer station will also have screening by significant walling along US Hwy 287 and Robinson Road.

12.5 Overloading and Breakdown [30 TAC §330.241]

The design capacity of the solid waste facility will not be exceeded during operation. The facility will not accumulate solid waste in quantities that cannot be processed within such time as will preclude the creation of odors, insect breeding, or harborage of other vectors. If such accumulations occur, additional solid waste will not be received until the adverse conditions are abated.

Waste generated as part of the recovery process and destined for landfill will be stored for no longer than 72 hours prior to transport off-site. The line capacity processing rate and recovery estimates are provided in Section 3.5, Table 3 to demonstrate the maximum and average waste processing times. Strategic Materials Facility material types generated and stored and an estimate of the amount of each material or waste to be stored at any one point in time is provided in Section 3.5, Table 4 and is based on bunker size and capacity. The maximum and average lengths of time that waste is to remain at the facility is provided in Section 3.5, Table 5.

Table 9: Turnover Rates

Turnover – January 2024 through June 2024		
Total Inbound (tons)	Total Processed (tons)	Turnover Rate %

6,7436.06	61,745.47	91.6
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If a significant work stoppage should occur due to a mechanical breakdown or other causes, the facility will restrict additional solid waste receipt. Under such circumstances, incoming solid waste will be diverted to an approved backup storage, processing, or disposal facility within 50 miles of the Strategic Materials Facility. If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harborage of vectors, steps will be taken to remove the accumulated solid waste from the facility to an approved backup storage, processing, or disposal facility within 24 hours.

12.6 Backup Provision

In the event of equipment repairs or during equipment maintenance periods, the facility will obtain equipment from other facilities, contractors, or local rental companies to avoid interruption of waste services. If the facility is inoperable for more than 24 hours, the accumulated solid waste will be loaded into transfer trailers with a front-end loader from the facility to an approved backup storage, processing, or disposal facility. Customers of the transfer station facility will be directed to an approved backup storage, processing, or disposal facility during the prolonged work stoppage.

13 SANITATION [30 TAC §330.243]

The facility is designed to facilitate proper cleaning. The potable water at this facility is provided by Hilco Water. The walls and floors in the operating areas are constructed of concrete and the walls of the building will be metal. These leak proof areas are protected from rain by a roof and the surrounding external areas will be graded to direct runoff towards the vegetative swale. Process wash water is not generated during the facility operations. All cleaning operations are completed by street sweepers, shovels, and brooms or front-end loader scraping, as described above. No washing activities using water occurs.

14 VENTILATION AND AIR POLLUTION CONTROL [30 TAC §330.245]

Air emissions from the facility will not cause or contribute to a condition of air pollution as defined in the Texas Clean Air Act.

The facility and any constructed air pollution abatement devices will obtain authorization, under Chapter 116 of this title (relating to Control of Air Pollution By Permits for New Construction or Modifications) or Subchapter U of this chapter (relating to Standard Air Permits for Municipal

Solid Waste Landfill Facilities and Transfer Stations), as applicable, from the Air Permits Division prior to the start of construction, except as authorized in Texas Health and Safety Code, §382.004, Construction While Permit Application Pending.

The facility will be designed and operated to provide adequate ventilation for odor control and employee safety. The operator will prevent nuisance odors from leaving the boundary of the facility. If nuisance odors are found to be passing the facility boundary, the facility operator will investigate and attempt to identify the source of the nuisance and immediately take action to abate the nuisance odor conditions. These abatement actions can include deploying portable odor suppression devices (i.e. deodorant misters or sprays), covering or tarping the area identified and/or suspending operations until the nuisance condition is abated.

All air pollution emission capture and abatement equipment or equivalent technology will be properly maintained and operated during the facility operation. Cleaning and maintenance of the abatement equipment will be performed as recommended by the manufacturer and as necessary so that the equipment efficiency can be adequately maintained.

This facility will NOT recover material from solid waste that contains putrescibles, and all waste management processes and activities will be maintained totally within an enclosed building. Openings to the process area will be controlled to prevent releases of nuisance odors from leaving the property boundary of the facility.

Reporting of emissions events will be made in accordance with 30 TAC §101.201, Emissions Event Reporting and Recordkeeping Requirements and reporting of scheduled maintenance will be made in accordance with 30 TAC §101.211, Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements.

Any ponded water at the facility will be controlled to avoid it becoming a nuisance. In the event that objectionable odors do occur, ponded water will be eliminated before objectionable odors occur to prevent the creation of nuisance odors. Appropriate measures will be taken to alleviate the condition such as filling and regrading the area of the occurrence.

15 HEALTH AND SAFETY [30 TAC §330.247]

15.1 Employee Sanitation Facilities [30 TAC §330.249]

The facility will have potable water and sanitary facilities for all employees and visitors.

15.2 Disease Vector Control

The operator will control vectors such as rodents, flies, and mosquitoes through proper daily facility operations. These operations include pumping standing water to the vegetated swale in order to avoid providing habitats for mosquitos as well as daily cleaning of trash and other debris to avoid the presence of rats and flies. If necessary, a licensed professional will apply pesticides for control of vectors to ensure that proper chemicals are used and that they are properly applied.