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August 17, 2017

Mr. Dwight Russell, P.E.  
Municipal Solid Waste Permits Section – MC 124  
Texas Commission on Environmental Quality  
12100 Park 35 Circle; Bldg. F  
Austin, Texas 78753

Re: Pescadito Environmental Resource Center - Webb County  
Municipal Solid Waste (MSW) Permit Application No. 2374  
Technically Complete Permit Application Supplement Number 5  
Tracking Nos. 20877533 and 20683791; CN603835489/RN106119639

Dear Mr. Russell;

APTIM Environmental and Infrastructure, Inc. (formerly known as CB&I Environmental and Infrastructure, Inc.) is providing the attached information to supplement the referenced permit application which was declared technically complete on March 11, 2016. We are providing this information in response to the TCEQ letter dated July 6, 2017 detailing three remaining items in the January 12, 2017 response to TCEQ's December 13, 2016 Notice of Deficiency (NOD).

The three remaining items to be addressed were: 1) the proposed landfill's location relative to the 100-year floodplain and to 2) existing pipelines and easements and 3) disputed property ownership issues.

The response regarding those three items was discussed in the July 7, 2017 Grissom & Thompson letter to TCEQ. That letter summarized an earlier June 22, 2017 meeting with the Executive Director and MSW permitting staff and indicated that a so-called "Plan C" would be submitted to revise the application as a Non-Notice Minor Amendment in order to remove the three listed items as points of concern. Plan C is herewith submitted. For this submitted Plan C, various portions of the application are being revised as outlined in the following table.

Tab ID	Title	Revised Portions
Part I	Text	No Change
Part II	Text	Revised Cover Page, Table of Contents (pages 1 - 4) and pages 8, 9, 11, 12, 17, 34, 36-37, and a new Attachment J is provided.
Part II	Figures	Revised Figures 3-5, 7-8

Part III	Text	Revised Cover Page, Table of Contents and pages 1-3.
Part III Attachment III-A	Site Development Plan Narrative	Revised Cover Page, Table of Contents and pages 2 and 7.
Part III, Attachment III-B	General Facility Design	Revised Cover Page, Table of Contents and pages 1, 3 and 5.
Part III, Appendix III-B.1	General Facility Design Figures	Revised Cover Page, Table of Contents and Figures B.1-2, B.1-3 and B.1-7.
Part III Attachment III-C	Facility Surface Water Drainage Report	No Change
Part III, Appendix III-C.1	Facility Surface Water Drainage Report Narrative	A complete new section is provided including Cover and TOC and pages 1 – 21.
Part III, Appendix III-C.2	Facility Surface Water Drainage Drawings	A complete new section is provided including Cover and TOC and Drawings C.2-1 through C.2-18.
Part III, Appendix III-C.3	Facility Surface Water Drainage Analysis	A complete new section is provided including Cover and TOC.
Part III, Appendix III-C.4	HydroCAD Model Outputs	A complete new section is provided including Cover and TOC.
Part III, Appendix III-C.5	Erosion Control Plan	Revised Cover Page, Table of Contents and page 4.
Part III, Attachment III-D	Waste Management Unit Design	Revised Cover Page, Table of Contents and pages 6 and 7.
Part III, Appendix III-D.1	Site Layout Figures	Revised Cover Page, Table of Contents and Figures D.1-1 through D.1-5.
Part III, Appendix III-D.2	Landfill Cross Sections	Revised Cover Page, Table of Contents and Figures D.2-1 through D.2-5.
Part III, Appendix III-D.3	Landfill Design and Details	Revised Cover Page, Table of Contents and Figures D.3-1, D.3-5, D.3-10 and D.3-11.
Part III, Appendix III-D.4	Landfill Operation and Site Life	Revised Cover Page, Table of Contents and pages 1 and 2.
Part III, Appendix III-D.5	Geotechnical Analysis Report	Revised Cover Page, Table of Contents and pages 1 through 7.
Part III, Appendix III-D.5-1	Summary of Geotechnical Design Parameters	Revised Cover Page and pages 1, 2, 5 and 6.
Part III, Appendix III-D.5-2	Slope Stability Analyses	Revised Cover Page and pages 1 through 5 and Reference Nos. 1, 2 (Fig.1) and 5.
Part III, Appendix III-D.5-3	Foundation Bearing Capacity Analyses	Revised Cover Page and pages 1 through 5 and Figure 1.

Part III, Appendix III-D.5-4	Landfill Foundation Settlement, Waste Settlement, and Soil Liner Strain Analyses	Revised Cover Page pages 1 through 9, Reference 4 (Figures 1 and 2) and Reference 5 (pages 1 through 8).
Part III, Appendix III-D.5-5	Final Cover Stability Analysis	No Change
Part III, Appendix III-D.5-6	Sideslope Liner Runout Analyses (with and without an anchor trench)	No Change
Part III, Appendix III-D.5-7	Slope Stability Analysis with Flexible Membrane Liner	No Change
Part III, Appendix III-D.6	Leachate and Contaminated Water Plan	Revised Cover Page, Table of Contents and pages 4, 5, 6, 8, 10, 11, 12 and 13.
Part III, Appendix III-D.6-A	Contaminated Water / Leachate Collection System Design Analysis	This entire section has been updated including references.
Part III, Appendix III-D.6-B	LCWP HELP Model Outputs	This entire section has been updated.
Part III, Appendix III-D.7	Liner Quality Control Plan	No Change
Part III, Appendix III-D.7-1	Liner Quality Control Plan – Poorly Permeable Demonstration	No Change
Part III, Appendix III-D.8	Alternative Final Cover Demonstration	Revised Cover Page, Table of Contents and pages 8, 9 and 11.
Part III, Appendix III-D.8-1	AFC HELP 3.07 Outputs	Revised Cover Page and III-D.8-1D HELP model run.
Part III, Appendix III-D.8-2	AFC References	No Change
Part III, Appendix III-D.8-3	Alternative Final Cover with FML Demonstration	No Change
Part III, Appendix III-D.9	Final Cover Quality Control Plan	No Change
Part III, Attachment III-E.0	Geology Report	Revised Cover Page, Table of Contents and Figure III-E.0-1.
Part III, Appendix III-E.1	Regional Geology and Hydrogeology	No Change
Part III, Appendix III-E.2	Subsurface Investigation Report	No Change
Part III, Appendix III-E.3	Geotechnical Data Report	No Change
Part III, Appendix III-E.4	Summary of Hydrogeologic Testing In Selected Piezometers	No Change
Part III, Appendix III-E.5	Supplemental Subsurface Investigation Report – Phase V	No Change
Part III, Attachment III-F	Groundwater Monitoring Plan	Revised Cover Page, Table of Contents and pages 3, 5, 6 and 9.

Part III, Appendix III-F.1	Groundwater Monitoring Plan Figures	Revised Cover Page, Table of Contents and Figures F.1-1 and F.1-2.
Part III, Appendix III-F.2	Groundwater Sampling and Analysis Plan	No Change
Part III, Attachment III-G	Landfill Gas Management Plan	Revised Cover Page, Table of Contents and pages 1, 3, 4, 5, 10, 16 and 21.
Part III, Appendix III-G.1	Landfill Gas Management Plan Figures	Revised Cover Page, Table of Contents and Figures G.1-1 and G.1-2.
Part III, Attachment III-H	Closure Plan	Revised Cover Page, Table of Contents and pages 1 and 2.
Part III, Attachment III-I	Post-Closure Care Plan	No Change
Part III, Attachment III-J	Cost Estimates for Closure and Post-Closure Care	Revised Cover Page, Table of Contents and pages 1 and 5 and Appendix J-1 (Cost Estimates – pages 1 - 4).
Part IV	Site Operating Plan	No Change

Our submittal is formatted as follows:

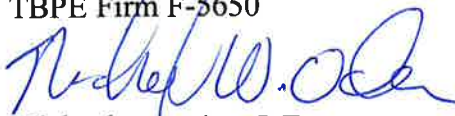
- Attachment A contains a new signature page from the Part 1 form and a revised Table of Contents.
- Attachment B contains the original version of the changed pages.
- Attachment C contains a redline / strikeout version of the changed pages.
- Attachment D contains three (3) copies of the original changed pages found in Attachment B for TCEQ use only.

Blue sheets have been inserted between the Attachments. For convenience, orange sheets are included to identify the various Appendices as divided by tabs in the original submittal. Green sheets have been inserted within certain Appendices to delineate separate sections, references, etc. within that Appendix. The information provided in this submittal is also being sent to the Laredo Public Library and uploaded to the web site at [www.pescaditoerc.com](http://www.pescaditoerc.com). We trust this information is clear and complete; however, should you need additional information, please let us know.

Sincerely,

**APTIM Environmental and Infrastructure, Inc.**

TBPE Firm F-5650



Michael W. Oden, P.E.

Project Manager

**Attachments**

- A – Part 1 Form Signature Page; Table of Contents**
- B – Original Replacement pages**
- C – Redline/Strikeout version of changed pages**
- D – Three copies of changed pages (TCEQ only)**

**CC: Mr. Carlos Y. Benavides III**  
**Mr. William W. Thompson**  
**Mr. Earl Lott – without Attachments**  
**Mr. Chance Goodin – without Attachments**  
**Ms. Gulay Aki – without Attachments**  
**Mr. Anthony Tatu**

**Attachment A**  
**to August 2017 Supplement Letter (MSW 2374)**

**Part I Form Signature Page**  
**Master Table of Contents**

**Signature Page**

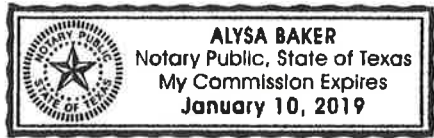
I, Carlos Y. Benavides, III, Manager  
(Site Operator (Permittee/Registrant)'s Authorized Signatory) (Title)

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

Signature: Carlos Y. Benavides III Date: Aug 15, 2017

~~TO BE COMPLETED BY THE OPERATOR IF THE APPLICATION IS SIGNED BY AN AUTHORIZED REPRESENTATIVE FOR THE OPERATOR~~  
I, \_\_\_\_\_, hereby designate \_\_\_\_\_  
(Print or Type Operator Name) (Print or Type Representative Name)  
as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.  
\_\_\_\_\_  
Printed or Typed Name of Operator or Principal Executive Officer  
\_\_\_\_\_  
Signature

SUBSCRIBED AND SWORN to before me by the said Carlos Y. Benavides, III  
On this 15<sup>th</sup> day of August, 2017  
My commission expires on the 10<sup>th</sup> day of January, 2019  
Alysa Baker  
Notary Public in and for  
Travis County, Texas  
(Note: Application Must Bear Signature & Seal of Notary Public)



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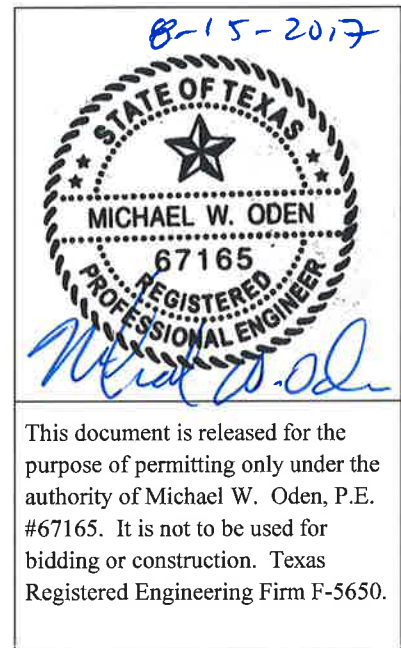
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