
Attachment B

TxDOT Coordination



505 East Huntland Drive
Suite 250
Austin, TX 78752

512.329.6080 PHONE
512.329.8750 FAX

www.TRCsolutions.com

March 28, 2011

Albert Quintanilla, P.E.
District Engineer, Laredo District
Texas Department of Transportation
1817 Bob Bullock Loop
Laredo, Texas 78043

**Reference: Rancho Viejo Waste Management, LLC
Laredo, Webb County, Texas**

Dear Mr. Quintanilla:

Rancho Viejo Waste Management, LLC has applied to the Texas Commission on Environmental Quality (TCEQ) for a permit for a municipal solid waste landfill to be located about 5 miles north of State Highway 359 (SH 359), near the north end of Jordan Road, about 18 miles east of Laredo, Texas. The proposed facility will receive approximately 120 truckloads of solid waste per day, primarily from the Laredo area. Ultimately approximately 240 truckloads of solid waste per day may travel to the site. Most of these trucks will travel between the site and the Kansas City Southern Railroad container handling yard located on the north side of SH 359 several miles east of Loop 20, because the landfill plans to accept solid waste transported in closed containers by rail. In the future, we plan to construct a rail siding near or into the landfill site. At that time, all rail shipments of waste will be off-loaded at the landfill, and this waste will not be transported on State or local roadways.

TCEQ regulations [30 TAC 330.61(i)(4)] require documentation of coordination with your agency regarding traffic and location restrictions. This letter is to inform you of the proposed landfill and request your response indicating that the facility will not conflict with any traffic or location restrictions of the Texas Department of Transportation (TxDOT). The applicant for this permit is under a strict deadline to file your response, so we would appreciate receiving it as soon as possible.

Please contact me if you have any questions. We look forward to your response.

Very truly yours,

A handwritten signature in black ink that reads "James F. Neyens".

James F. Neyens, P.E.
TBPE Firm Registration No. F-3775



03/28/2011



Technically Complete, March 11, 2016

Texas Department of Transportation

1817 BOB BULLOCK LOOP • LAREDO, TX 78043 • (956) 712-7400 FAX (956) 712-7401

April 8, 2011

Mr. James F. Neyens, P.E.
TRC Solutions
505 East Huntland Drive, Suite 250
Austin, Texas 78752

RE: Rancho Viejo Waste Management, LLC
Laredo, Webb County, Texas

Dear Mr. Neyens:

The Texas Department of Transportation (TxDOT) Laredo District has met with your client, Mr. Carlos Y. Benavides, to discuss this proposed municipal solid waste landfill. As mentioned in our discussion, the proposed site is approximately 5 miles north of State Highway 359 (SH 359) near the north end of Jordan Road.

As noted in our discussion, this proposed site does not conflict with any traffic or location restrictions of the department. As a part of TxDOT's long range plans, projected developments along SH 359 east of Laredo has been anticipated to continue in the future, thus our long range plan includes widening along SH 359 from Laredo headed east to add passing lanes in a Super Two configuration. In addition to these planned widening projects, the district will also be studying the need for dedicated left turn lanes at state and county road intersections. Thus, while a dedicated left turn lane from SH 359 to Jordan Road does not currently exist, it is a part of our long range plan.

With the need for additional municipal solid waste landfill capacity in the Webb County area in the near future, your clients proposed site may not only provide the additional capacity, it has been planned in a manner that does not appear to negatively impact traffic operations on the state highway system. If I may be of any further assistance regarding this proposed project, please contact me at (956) 712-7405.

Sincerely,

Albert Quintanilla, P.E.
TxDOT Laredo District Engineer

cc: Mr. Carlos Y. Benavides

Attachment C

Texas Historical Commission Review Letter

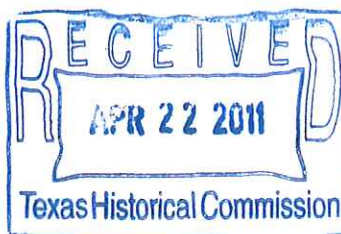


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Technically Complete, March 11, 2016



March 28, 2011

Texas Historical Commission
P.O. Box 12276
Austin, Texas 78711-2276

**Reference: Rancho Viejo Waste Management, LLC - Municipal Solid Waste Landfill
Laredo, Webb County, Texas**

Dear Historical Commission Staff Member:

Rancho Viejo Waste Management, LLC has applied to the Texas Commission on Environmental Quality (TCEQ) for a permit for a municipal solid waste landfill to be located approximately 18 miles east of Laredo and about 5 miles north of State Highway 359 in Webb County, Texas.

TCEQ regulations [30 TAC 330.61(o)] require documentation of coordination with your agency regarding historical sites and cultural resources. The purpose of this letter is to inform you of the proposed solid waste landfill facility and request your response indicating that the facility as proposed will not conflict with established historical sites or known cultural resources sites. The applicant is under a strict deadline to file your response, so we would appreciate receiving it as soon as possible.

A location map showing the proposed landfill with respect to readily identifiable features is enclosed to assist in your determination.

Please contact me if you have any questions. We look forward to your response.

Very truly yours,



James F. Neyens, P.E.
TBPE Firm Registration No. F-3775



03/28/2011



Attachment D

Cultural Resources Review

To: James Neyens, P.E., TRC
From: Kendra G. DuBois, TRC
Date: October 23, 2009
Subject: **Proposed Land Fill Webb County, Texas**

This cultural resources file search was performed as part of the completion of a Texas Commission on Environmental Quality permit application (§330.61). The Texas Historical Commission Archeological Sites Atlas was utilized to conduct the search. The Area of Potential Effect (APE), a 1210-acre parcel designated for the proposed land fill, has never been surveyed for cultural resources (see Figure 1). Thus, the presence of such resources within the APE is unknown. In addition, there are no archeological sites, historical markers, historic places on the national register, or cemeteries documented on the THC Archeological Sites Atlas inside of the APE or within a one-mile radius of the APE.

Attachment E

Local Agency Coordination



DANNY VALDEZ
WEBB COUNTY JUDGE

April 13, 2011

Pescadito Environmental Resource Center
Attn: Carlos Y. Benavides

Re: Letter of Support, Pescadito Environmental Resource Center

Dear Mr. Benavides:

This letter is in support of the future development of the Pescadito Environmental Resource Center, a proposed state-of-the-art solid waste management facility in Webb County, Texas. The continued population growth and economic development of Webb County requires infrastructure to meet its future needs, including proper management of solid waste. While Webb County needs an environmentally secure landfill, we recognize that landfill disposal alone is not the answer for the future. A landfill should be employed only for those wastes that cannot be recycled or put to some beneficial re-use.

We find that the Pescadito Environmental Resource Center offers Webb County a long term solid waste management facility that will include comprehensive recycling in a location that is both environmentally well-suited and compatible with surrounding land use. Because the facility is proposed to be served by rail, it can serve a broad region without causing impacts to Webb County traffic or its residential communities. Furthermore, the facility will provide significant direct economic impacts, including long-term employment, payroll and taxes. The County of Webb supports the benefits of this proposed project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Danny Valdez".

Danny Valdez
Webb County Judge

xc: Webb County Commissioner's Court



SOUTH TEXAS DEVELOPMENT COUNCIL

December 12, 2011

JOSE ALFREDO GUERRA, JR.
CHAIRMAN
MAYOR
CITY OF ROMA

CYNTHIA LIENDO ESPINOZA
VICE-CHAIRMAN
COUNCIL MEMBER
CITY OF LAREDO

RUBEN VILLARREAL
SECRETARY-TREASURER
MAYOR
CITY OF RIO GRANDE

AMANDO GARZA, JR.
EXECUTIVE DIRECTOR

Ms. Christine Bergren
Manager
Municipal Solid Waste Permits Section
Waste Permits Division
Texas Natural Resource Conservation Commission
P.O. Box 13087 (MC 124)
Austin, Texas 78711-3087

Dear Ms. Bergren:

Re: Outcome Review of Permit Application MSW Permit No. 2374, Pescadito Environmental Resource Center conformance with the South Texas Regional SWM Plan

The application for the Pescadito Environmental Resource Center under the Texas Commission on Environmental Quality (TCEQ) MSW Permit No. 2374, for a permit Type I Municipal Solid Waste Facility to be located in Webb County, Texas, was reviewed on December 8, 2011 by the South Texas Development Council's (STDC), Regional Solid Waste Management Advisory Committee (SWAC).

The review was conducted to determine the facility's conformance with the South Texas Regional SWM Plan and general land use compatibility, as found in Chapter Four, Volume II of the South Texas Development Council Regional Solid Waste Management Plan. The SWAC has determined that the application of Pescadito Environmental Resource Center, Rancho Viejo Waste Management, LLC., Solid Waste Disposal Facility, under TCEQ MSW Permit No. 2374, is in conformance with the South Texas Regional Solid Waste Management Plan. Furthermore, that the location of the proposed facility appears to be compatible with the general land use within the given land portion of Webb County.

If you should have any questions regarding the contents of this correspondence, please contact Mr. John Keiser at (956)722-3995 or e-mail jrkeiser@stdc.cog.tx.us.

Sincerely,

Amando Garza, Jr.
Executive Director

Cc: Cheryl Untermeyer, Waste Permits Division, TCEQ, Austin, Texas
James F. Neyens, P.E., TRC Environmental Corporation, Austin, Texas



505 East Huniland Drive
Suite 250
Austin, TX 78752

712 PHONE
512.3... 7 FAX

August 22, 2011

John Keiser, Program Manager
Solid Waste Program
South Texas Development Council
1002 Dickey Lane
Laredo, Texas 78043-4237

Reference: Proposed Rancho Viejo Waste Management, LLC – Municipal Solid Waste Facility – STDC Checklist for Review

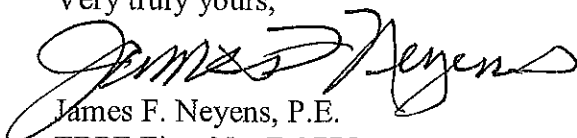
Dear Mr. Keiser:

As you know from our previous correspondence, Rancho Viejo Waste Management, LLC has applied to the Texas Commission on Environmental Quality (TCEQ) for a permit for a proposed Type I municipal solid waste management facility to be located approximately 18 miles east of Laredo, Texas. A copy of Parts I and II of the application was sent to the South Texas Development Council (STDC) for review on March 28, 2011.

TCEQ regulations [30 TAC 330.61(p)] require a demonstration of compliance with the regional solid waste plan that was developed under the leadership of your agency. STDC developed a checklist to assist your agency with its review of such applications. We have completed the enclosed checklist and are submitting it for your review.

Together with the applicant and other members of our project team, we look forward to the opportunity to meet with you and your staff or other representatives of STDC to discuss the proposed project. We believe the proposed facility will serve the solid waste management, waste diversion and recycling needs of South Texas for many years. We further believe the proposed facility will be in compliance with the regional solid waste plan, goals and recommendations.

Very truly yours,


James F. Neyens, P.E.
TBPE Firm No. F-3775

**SOUTH TEXAS DEVELOPMENT COUNCIL
Checklist for Review of Conformance with
Regional Plan Goals and Recommendations and
General Land Use Compatibility**

INSTRUCTIONS

As stated in Chapter Four of the amended regional solid waste plan, MSW facility permit or registration applicants may request a regional plan conformance review by submitting the following packet of information to STDC:

1. Cover letter from an official representative of the applicant to Mr. Amando Garza, Jr., Executive Director, requesting the regional plan conformance review. The cover letter should include contact information.
2. A completed STDC regional plan conformance checklist.
3. A copy of Parts 1 and 2 of the application materials submitted to TCEQ.
4. Any additional information the applicant wishes to provide.

Please complete all parts of the checklist appropriately. Please word-process the checklist, and expand any response spaces as necessary. The checklist must be signed by an official representative of the applicant. Please submit your complete packet of information to:

South Texas Development Council
1002 Dicky Lane
P.O. Box 2187
Laredo, Texas 78044
Attention: Mr. John Keiser, Regional Program Manager

RANCHO VIEJO WASTE MANAGEMENT, LLC

**PESCADITO ENVIRONMENTAL RESOURCE CENTER
LANDFILL, RECYCLING AND LIQUID WASTE PROCESSING FACILITY
LAREDO, TEXAS 78043**

GENERAL INFORMATION

Applicant: Rancho Viejo Waste Management, LLC
1116 Calle del Norte
Laredo, Texas 78041

Permit or registration number: 2374

Facility type: Type I landfill with Type V Grease and Grit Processing

Location description (also, please attach an 8½x11 map showing the general location):
Approximately 20 miles east of Laredo and 5 miles north of SH 359 in Webb County, Texas

Description of service area and facility customers:

Rancho Viejo Waste Management, LLC (RVWM) is planning to serve two service areas and two types of customers. The first service area includes Laredo, Webb County and adjacent areas, with customers that include municipalities, commercial establishments and industrial entities. Typically,

this service area will be served by direct hauling of waste materials and recyclables or transporting waste through transfer stations (including possibly rail hauling). The second service area is national and international, with municipal, commercial and industrial generators shipping through transfer stations and shipping by rail. The international service area is expected to be limited to nonhazardous industrial waste generated by rail-served industries in Mexico.

Waste types to be accepted by the facility (note if any interstate, international, Class I nonhazardous industrial, or special waste will be accepted):

Waste types to be accepted include:

1. Municipal solid waste by truck
2. Municipal solid waste by rail (including interstate)
3. Nonhazardous industrial waste by truck and rail (including interstate and international sources and Class I nonhazardous waste in accordance with TCEQ restrictions)
4. Event-type municipal solid waste from disaster cleanups (including interstate)
5. Certain types of special wastes to be managed according to specific practices or on-site treatment (sludge, grease and grit trap waste, electronic waste, incinerator ash or coal combustion waste, scrap tires) (including interstate), and
6. Under the regulatory authority of the Railroad Commission of Texas, liquid waste from oil and gas exploration and production for underground injection.

Solid waste management activities to be conducted at the facility site (e.g., disposal, treatment, recycling, storage, transfer, etc.):

Solid waste management and recycling processing activities include:

1. Landfill disposal of municipal solid waste, nonhazardous industrial waste, event-type waste, special waste (in accordance with TCEQ restrictions), and the non-recyclable fraction of shipments of recyclables following processing
2. Storage and treatment of grease and grit trap waste
3. Storage and treatment of sludge as needed to allow landfill disposal
4. Recycling of construction and demolition debris
5. Processing of comingled recyclables to reclaim commodities
6. Storage and processing of event-type waste to facilitate recovery of recyclable materials
7. Storage and processing of scrap tires and electronic waste to facilitate recycling, and
8. Other waste management and recycling activities that are compatible with the facility, compliant with TCEQ and other applicable rules, and are supported by market needs.

Types of equipment to be operated at the facility site:

Landfill equipment includes landfill compactors (two, min.), bulldozer, hydraulic excavator, motor grader, crane for intermodal container handling, bucket loader, flat bed tractor/trailer, and water truck. Recycling processing equipment includes rubber-tired loader, conveyor-type processing line with picking stations and semi-automated processing equipment, balers (two, min.). Grease and grit processing equipment includes storage tanks, chemical storage and feeding systems, mixing tank, pumps and dewatering system. Processing equipment for scrap tires and electronic waste is to be determined.

Hours of facility operation:

Up to 24 hours per day, 7 days per week, as needed based on volume of material received.

Facility staffing (include typical number and extent of certification):

The anticipated staffing for this facility comprises the following personnel. A range in numbers is shown to indicate positions where the staffing will vary according to the amount of waste or other materials that are received, with the lower number representing initial staffing. General manager (one,

with minimum of 5 years waste management experience and Class A license (per 30 TAC§30, Subchapter F); Landfill supervisor (one, Class A or B); Recycling facility supervision (one, Class A or B); Transportation supervisor (one, commercial driver's license); Landfill equipment operator (two to five, no certification required); Shift foremen (none to six, Class B); Laborers, facility-wide (two to 18, no certification required); Recycling equipment operator (one to two, no certification required); Gate attendant (one to four, no certification required); Accountant (one and one to two assistants, no certification required); Marketing staff (one to three, manager to have 5-10 years experience in solid waste services marketing).

CONFORMANCE WITH REGIONAL PLAN GOALS AND RECOMMENDATIONS

As applicable, describe the extent to which the proposed facility supports the following selected goals and recommendations of the amended regional solid waste management plan:

Goal 1: Ensure adequate disposal facilities and long-range disposal capacity in the region.

Recommendation 1.1: Development of public and private disposal facilities should not be in conflict with state, regional, and local solid waste management plans.

RVWM intends the privately-developed Pescadito Environmental Resource Center will be fully compliant with existing state, regional and local solid waste management plans, and intends to work closely with waste generators and planning officials in its service areas to ensure that its services meet current and anticipated future needs. RVWM plans to do this by offering a range of services that address the entire region's needs, especially in areas such as recycling and waste diversion. Some of these needs have been largely unmet to date.

Recommendation 1.2: Application for any landfill or alternative technology facility permit should be required to present an integrated solid waste management program that conforms to the amended regional solid waste management plan.

RVWM proposes to offer processing of recyclable materials, management of liquid wastes (grease and grit trap waste, processing of construction and demolition (C&D) waste to recover recyclables, and potentially other services to achieve a truly integrated solution to the waste management needs of the region.

Recommendation 1.4: Maximize landfill capacity in the region through increased resource recovery, conservation and waste diversion activities, including a study of regional alternatives.

While the PERC landfill will have ample capacity for many decades of service, RVWM views landfill disposal to be the last alternative rather than the first. Processing of commingled (or single stream) recyclables, C&D waste, and potentially electronic waste are planned services that will divert waste from the landfill and maximize landfill capacity for the future. But more importantly, these activities will recover reusable commodities and thus conserve natural resources.

Recommendation 1.5: Through regional cooperation, and to take advantage of economies of scale, eliminate the development of new, small arid-exempt landfills serving local areas, and focus on the development of transfer stations to transport waste to regional facilities. RVWM proposes to work with cities, counties and solid waste authorities in South Texas to offer financial and/or technical support for the development of local transfer stations as an alternative to continued operation of small local landfills. RVWM believes this approach can be a viable solution if coupled with a mutually agreeable contract for waste management services.

Recommendation 1.6: The long-term solution to the region's MSW disposal needs is best met through regional landfills, and any future expansions of current landfills or development of new landfills should conform to this approach.
PERC is intended to serve as a regional landfill.

Recommendation 1.7: Evaluate and review new and proven technologies for the disposal of wastes within the region.
RVWM fully intends to evaluate and review any new or proven technology, and to employ all such technologies that are economically viable and consistent with the overall development of this facility.

Goal 2: Ensure that solid waste management issues and needs and environmental protection in rural areas and colonias are adequately addressed.

Recommendation 2.1: Present appropriate alternatives in providing solid waste management services to rural subdivisions and colonias of South Texas.
RVWM will discuss methods of providing waste management services to rural subdivision and *colonias* with Webb County or other local authorities. Possible solutions to be considered include RVWM providing financial and technical support for developing citizens' collection stations in such locations if the local authority has a means of paying for the operation (waste transportation and disposal) of these facilities.

Recommendation 2.4: Rural communities should study the specific advantages of developing transfer stations for managing their municipal solid waste.
RVWM will work with elected officials of rural communities or local government for the establishment of such solutions.

Recommendation 2.5: Rural area governments and operators of existing, small MSW facilities should evaluate and utilize new waste management technologies.
Although this recommendation is not directly applicable to RVWM, it will nonetheless provide assistance to rural areas in efforts to adopt new technologies.

Goal 4: Encourage efficient, effective, and equitable solid waste management practices and actions in the South Texas region.

Recommendation 4.1: Continue to encourage counties and municipalities in South Texas to ensure that adequate solid waste services are available to all residents within their jurisdictions.

As discussed under recommendations 1.5 and 1.6, RVWM will provide the initiative plus the upfront financial support to counties and municipalities in South Texas that wish to improve solid waste services. For example, by supporting the development of local transfer stations and citizens' collection stations in return for contracts for transportation and disposal of waste and processing of recyclables, RVWM would help these local entities focus their resources on the operation of waste and recyclable collection systems within their jurisdictions.

Recommendation 4.2: Improve overall systems of residential waste collection, transfer, and transportation.

As discussed under recommendations 1.5, 1.6 and 4.1, RVWM proposes to develop partnership agreements that could enable local jurisdictions focus their efforts on waste and recyclables collection, which they can do most effectively, while RVWM can provide the collection, processing and disposal services, which it can do very well.

Goal 6: Increase waste diversion and recycling in the South Texas region; establish local waste diversion recycling goals that best represent individual planning unit needs and capabilities; and continue support of long-term planning for waste diversion and recycling activities, market development, and innovative technologies in the region.

Recommendation 6.1: Support measures that can achieve the greatest solid waste management benefits/results, such as source reduction, waste diversion, and recycling. RVWM proposes to offer centralized processing of recyclables materials and the delivery of recycled commodities to their markets. These activities provide the financial support that is necessary to insure the long term success of waste diversion and recycling programs.

Recommendation 6.2: Encourage utilization of shredders and chippers for diversion and volume reduction of yard waste.

The PERC facility anticipates employing efficient processing equipment for yard waste at its facility. RVWM plans to employ this equipment to shred or compost all yard waste that is delivered to PERC as a source-separated material, or that can be separated by the processing of C&D waste. RVWM does not propose to operate a material recovery facility (MRF) to remove yard waste that is commingled with household waste. Large scale or community wide diversion of yard waste can only be accomplished by regulatory action of the community itself. The community would need to enact an ordinance that requires separate bagging and storage of yard waste, and also provide for the collection and delivery of source-separated yard waste to PERC. RVWM will provide its support to such measures.

Recommendation 6.3: Promote source separation of yard waste so that it can be more effectively used in chipping and composting programs.

As stated in its response to recommendation 6.2, RVWM will support the local initiatives that are required to implement source separation of yard waste.

Recommendation 6.5: Continue and expand existing waste diversion and reduction programs as necessary and feasible.

RVWM will work to support and expand all existing effective programs to accomplish this recommendation.

Recommendation 6.6: Support development and implementation of new waste diversion and reduction programs to the extent technologically and economically feasible.

RVWM is a forward looking waste services company that is committed to waste diversion and reduction, and will work to support all reasonable and effective programs to accomplish this goal.

Recommendation 6.8: Encourage the private sector to become involved in source reduction and waste minimization.

RVWM intends to become a regional leader with its efforts to reduce waste through recycling and waste diversion, and intends to promote these approaches to the private sector.

Goal 9: Ensure that special wastes are managed in an efficient, effective, and environmentally sound manner.

Recommendation 9.2: Establish public used oil and used oil filter collection programs as part of developing strategies for prohibiting the disposal of automotive wastes in the region's landfills.

Although RVWM supports the concept of used oil and used oil filter collection by the public, its present business plans do not include a venue for establishing such a program. PERC is not located where such a program would be useful to the public.

Recommendation 9.4: Encourage better management of municipal sludge and agricultural wastes for the South Texas region.

RVWM is interested in managing municipal sludge, either as a special waste or as a component to on-site composting, and plans to establish this service either as part of its current permit application or as an amendment, depending on the status of current municipal sludge management practices in the region. RVWM has not yet explored the market for agricultural waste management, but is open to the concept of providing this service.

Goal 10: The SWAC should review and comment on all permit applications for MSW management facilities in the region.

Recommendation 10.2: Protect water and other environmental resources from the potential adverse impacts of siting MSW landfills and other disposal facilities.

The proposed PERC facility site was chosen in part because it is very well suited to provide natural protection to water and other environmental resources. The facility will be designed and constructed to enhance its natural environmental protection with appropriate engineered features such as liner, leachate collection system, and daily, interim and final cover system.

Recommendation 10.3: Facility design and operating plans should consider the impact on the residents in close proximity to the facility and take appropriate measures to minimize the impact.

The facility design and operating plans provide suitable protection for residents if they were located in close proximity of the facility, however there are no residents within several miles of the facility, except for fewer than five ranch hands that live about one-quarter mile southwest of the facility boundary. These persons are housed at a location that will be nearly two miles from the part of the landfill that will be operated initially.

GENERAL LAND USE COMPATIBILITY

Description of any applicable local zoning or siting restrictions:

The facility is in rural Webb County, well outside the extra-territorial jurisdiction (ETJ) of the City of Laredo. There are no zoning or land use restrictions applicable to the site or surrounding area. A portion of the site is currently located within the 100-year floodplain, but engineering studies currently being complete will result in a design of surface water management systems that will be submitted to Webb County Planning Department and then to the Federal Emergency Management Agency (FEMA). The result of this engineering design is expected to result in the issuance of a Conditional Letter of Map Revision (CLOMR) by FEMA, which will signify that the construction of the designed improvements will result in the removal of the area of the site that is planned for development from the 100-year floodplain. Also, there are certain areas on the site associated with several artificially-constructed livestock ponds that have been studied and designated as wetlands subject to Federal jurisdiction. Plans are being developed to secure approval from the U.S. Army Corps of Engineers to replace these wetlands with compensatory wetlands under a Section 404 Permit under the Federal Clean Water Act. Studies have shown there are no other restrictions to developing the site under federal, state or local restrictions.

Description of current land uses within one-half mile of the proposed facility site:

Except for several residential structures used by ranch hands as discussed under Recommendation 10.3 above, all land within one-half mile of the proposed facility is used for cattle ranching or oil and gas production, including the improvements associated with these uses (roadways, stock watering tanks, etc).

Description of any property adjacent to the proposed facility site that has been purchased, zoned, or platted for future development known at this time:

There are no such properties being considered for future development known to RVWM.

Description of the extent measures will be taken to control noise, odors, vectors, and litter associated with the facility and its operations:

Before discussing the measures to be taken to mitigate possible impacts to others associated with this facility and its operation, it is important to emphasize that the potential for impacts from each of these conditions to affect third parties such as neighbors or the general public diminishes with separation distance. This facility is separated from its nearest neighbor by a distance of more than two miles. The next nearest neighbor and an area that is accessible to the general public is about three to four miles away. In reality, the facility basically cannot be seen or heard by the public, and odors (if any are released by the facility) should be undetectable at these distances.

The only significant source of noise is the operation of trucks and motorized construction equipment. This noise will be controlled by requiring all trucks and motorized equipment to be provided with mufflers in good condition, and utilizing such equipment at relatively low speeds or engine revolutions per minute.

Odors will be controlled by the delivery of waste in closed or covered containers. Potentially odiferous waste will only be exposed to the atmosphere when it is uncovered or the container is opened at the working face of the landfill. The waste is only exposed as it is actually being placed into the landfill, and as soon as it is placed, it is compacted and covered. The working face is the only surface where waste will be exposed, and the working face will be restricted to the smallest practical area. Stockpiles of soil will be maintained at the working face, and will be used to cover waste throughout the day.

Vectors will be controlled by keeping the types of waste that might attract vectors enclosed until it is landfilled, and then by promptly applying cover soil.

Similarly, litter will be controlled by keeping waste enclosed, applying cover soil, and as necessary, employing litter barrier fences near the active face of the landfill.

Description of the extent to which the facility will have a visual impact on the surrounding landscape (e.g., for a landfill, the maximum height of aerial fill compared to the height of surrounding features): As described above, the facility including the landfill will be separated from public view by a horizontal distance of about 3 to 4 miles. The closest public view is from U.S. Highway 59 near Ranchitos los Lomas which is northwest of PERC. The intervening terrain includes a brush-covered hill less than a mile from Hwy 59 that is about 60 feet higher in elevation, and is about one-sixth the distance to the landfill area. The highest existing ground surface elevation at the landfill site is about 30 feet lower than the elevation along Hwy 59. By simple geometry, these terrain features will prevent a person along Hwy 59 from seeing something at the landfill location unless it is over about 400 feet above grade. While we do not yet have a final design height for the landfill, it will not be anywhere near 400 feet high. Therefore, it will be impossible for anyone to see the landfill from this location, or from the adjacent community of Ranchitos los Lomas.

Description of any significant cultural or environmental features within one-half mile of the proposed facility site, and any efforts to mitigate impacts:

We have confirmed from the Texas Historical Commission that there are no known areas of cultural or historical significance within one-half mile of the site. There are also no known environmental features except the 100-year floodplain and wetlands described above, for which we will have mitigation measures reviewed and approved by appropriate agencies.

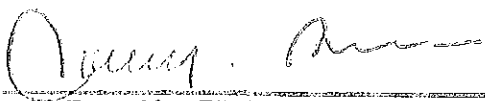
Description of effects the facility and its operations will have on local traffic patterns, and any efforts to mitigate impacts:

The predominant method of shipment of waste and recyclable materials will be by rail. The new ranch for PERC is situated on the main line of the Kansas City Southern Railroad (KCS), and we anticipate constructing a siding directly into the landfill area. Initially, until the waste volume is large enough, we may bring waste to the facility via the KCS intermodal shipping yard near State Highway 359 east of Laredo. SH 359 is designated as the access route to the facility, and will be used by trucks hauling locally-generated waste from the Laredo area. We have submitted our traffic and access plans to the TxDOT Laredo Region Office, and TxDOT has stated in writing that it concurs with this plan.

Description of any other efforts taken to address community concerns:
RVWM is committed to meeting with elected officials, governmental agencies, and interested citizens to explain the plans for the facility and answer any questions, and has already been doing this. Thus far, the reception has been very positive and no community concerns have been raised.

CERTIFICATION

I (We) hereby certify that the information contained herein is, to the best of my (our) knowledge, complete and accurate.



Carlos Y. Benavides, III - Partner
Rancho Viejo Waste Management, LLC
Date 8/18/2011



Cristina B. Alexander - Partner
Rancho Viejo Waste Management, LLC
Date 8/8/2011



Guillermo Benavides - Partner
Rancho Viejo Waste Management, LLC
Date 8-18-11

