



OJD Engineering
The Benchmark

September 21, 2018

Ms. Daniela Ortiz de Montellano, Project Manager
Texas Commission on Environmental Quality
Municipal Solid Waste Permits Section
Waste Permits Division MC-124
P.O. Box 13087
Austin, TX 78711-3087

Re: MedCare Environmental Solutions – El Paso County
Municipal Solid Waste (MSW) – Registration No. 40294
New Registration Application – Notice of Deficiency (NOD)
Tracking Nos. 22704154 & 23063850; RN102330248/CN605450303

Dear Ms. Ortiz de Montellano:

Attached are the responses to each Notice of Deficiency (NOD) for the MedCare Environmental Solutions, Inc. Municipal Solid Waste (MSW) registration permit. I have attached an original and three (3) copies of the revisions as per your request.

Sincerely,

Clint Green

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Citation/Technical Comments

1. Introduction & §326.75(b) SOP – Identify the types of waste that are not going to be treated but will be stored and transferred.

These sections have been revised to provide the following statement: There will be no wastes received at the facility that will not be able to be able to be treated on site.

2. §326.71(a)(5) – Provide No. of residents and commercial facilities within one mile.

Section §326.71(a)(5) on page 14 has been revised to provide the number of residential and commercial facilities within one mile.

3. §326.71(e)(2) – Provide existing and expected vehicular traffic volume within one mile.

Existing vehicular traffic volume has been provided in Section §326.71(e)(2) and expected vehicular traffic volume has been provided in Section §326.71(e)(3).

A revised Drawing 1-13 has been attached to provide vehicular traffic volume within one mile of the proposed facility.

4. §326.71(3)(4) & §326.69(d)(6) – Provide correspondence letter from Texas Department of Transportation and reference.

A letter was mailed to Texas Department of Transportaion on January 16, 2018, however, no correrespondence was received back from Texas Department of Transportation. An email was sent on September 17, 2018. A corresponding email from TxDOT has been provided with this letter.

5. §326.71(f)(4) – Explain why the following statement “which is approximately 15 feet higher than the area that is Zoned AH, there is a marginal chane of flooding due to backwater” was removed on the revised submittal.

This statement was removed, because it was verbiage used in a previous waste treatment permit. This statement has no relevance to this permit.



6. §326.71 – Provide reference

Information for this section was provided by the Rio Grande Council of Governments website - <http://www.riocog.org/about.htm> and the City of El Paso website - <https://www.elpasotexas.gov/> and <https://practicegreenhealth.org/topics/less-waste>

7. §326.71 – Remove text regarding alternatives to buffer zone, if not applicable.

This section has been revised to remove text regarding alternatives to buffer zones that are not applicable.

8. §326.71 – Provide autoclave(s) processing capacity.

1,500 to 2,000 pounds per hour per Nord Sorensen.

9. §326.71 – Revise added text and flow diagram.

Added text in this section has been revised. The flow diagram has been revised to provide consistency with the description in this section.

10. §326.71 – State maximum storage capacity.

This section has been revised to state the maximum storage capacity.

11. §326.75 SOP –

- a. Revise volume and mass amounts, and conversion units.

These amounts have been revised.

- b. State maximum waste storage capacity and maximum length of time untreated and processed medical waste will remain at the facility at any point in time.

The maximum waste storage capacity and maximum length of time untreated and processed medical waste will remain at the facility have been revised.

- c. Correct maximum daily waste acceptance rate.



This rate has been revised.

- d. Cite §326.61(h) where applicable

This rules has been cited where applicable.

12. §326.75 SOP – Acceptance of recyclable materials feom health care-related facilities.

The statement regarding recycling materials on pp. iv has been removed, as there will be no recycling materials received at the MedCare facility. On pp vii, “recyclable materials” has been revmoved, as there will be no recycling materials received at the MedCare facility. On Page 52, the statement has been added that MedCare will not accept or treat any recyclable materials from health care-related facilities.

13. Drawings

- a. Revise to show the residential areas

This drawing has been revised to show the residential areas

- b. Revise scale

A revised scale has been provided for this drawing.

14. Drawings

- a. Revise to show color coding that is distinct when reproduced.

This drawing has been revised to show color coding that is distinct when reproduced.

- b. Revise scale

A revised scale has been provided for this drawing.

15. Drawings – Revise the Site Layout to show the buffer zone along the registration boundary and properly label the required attributes.

A revised drawing has been provided to show the buffer zone along the registration boundary and the required attributes have been properly labled.



16. Drawings

This drawing has been revised to provide existing vehicular traffic within one mile to correspond with section §326.71(e)(2)

a. Revise scale

A revised scale has been provided for this drawing.

b. Provide north arrow (to understand the geographic orientation of the site)

A north arrow has been provided on this drawing.

17. I forgot to include a comment regarding operating hours. Please explain why the facility needs to operate 24/7, page 67.

MedCare business operations will allow for the operation of the facility at 24 hours per day 7 days per week, in order to accommodate the receipt of waste from Company owned trucks and contract transporters, and to accommodate the processing and treatment of received waste in a timely manner. The facility will operate with primary hours being 6:00 AM To 8:00 PM, with excess open hours being utilized only as required.