



Everett Griffith, Jr. & Associates Inc.
ENGINEERS • SURVEYORS

March 9, 2022

Kristen A. Hernandez, Project Manager
Municipal Solid Waste Permits (MC-124)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087
Phone: (512) 239-5090

SENT BY CERTIFIED MAIL

Re: R&J Recycling and Disposal Medical Waste Facility (Center, Texas)
Application for Medical Waste Registration (MSW Registration No. 40325)
Response to NOD dated March 3, 2022 (Tracking No. 27263576)

Dear Ms. Hernandez:

This letter and the attached submittals are in response to the second NOD dated March 3, 2022. As requested, each of the comments from your NOD e-mail are provided in the table below followed by a response. The responses indicate the location of each revision in the Application for Medical Waste Registration or its attachments. For ease of reading, the comments are listed in bold font and their responses are in italic font:

1. In accordance with 30 TAC 326.71(e)(4), provide updated coordination with TxDOT.

Mr. Matt Brazil from the local TxDOT office has indicated in their most recent e-mail (dated March 9, 2022) that TxDOT has no objections to this project. A copy of the e-mail (and the entire e-mail chain) is attached herewith for inclusion in Attachment 10.

2. For 326.71(h)(4), include language in the process diagram that the untreated medical waste will be processed as single stream.

The Flow Chart and its Narrative have been modified to include the language that the untreated waste stream will be processed as a single stream. A copy of the revised pages are included herewith for inclusion in Attachment 7.

The following is a summary of the items included in this submittal:

1. Correspondence Cover Sheet (Form TCEQ-20714). The TCEQ tracking number also indicated therein.
2. Cover letter (this document)
3. An original and two (2) unmarked copies of the revised pages from Form TCEQ-20789 (Application for a Medical Waste Registration). One (1) marked copy is also included in which the revisions are indicated by yellow highlighting. All submitted pages include the revision date.

The revised pages submitted for replacement in Form TCEQ-20789 consist of the following:

- Revised Cover - The cover bears the revision date, project engineer's seal and signature, and engineering firm number.
- Revised Table of Contents - The table of contents lists the revision date in the header and bears the updated project engineer's signature and seal. The engineering firm number is provided as well.
- Updated Applicant Certification and Signature Page - As requested, a new signature page is included herewith. It has been signed by the applicant and notarized. The revision date is also included in the header.

The original and copies have also been three-hole punched for ease of inclusion in the three-ring binders that hold the original application submittal for this facility. Please use these submittals to replace the original pages in the three-ring binders.

4. An original and two (2) copies of the latest correspondence with the local TxDOT office stating that they have no objections to this project. These have been three-hole punched for inclusion in Attachment 10.
5. An original and two (2) copies of the revised process flow diagram and its narrative for replacement in Attachment 7. These have been three-hole punched for ease of replacement. One (1) marked copy is also included in which the revisions are indicated by yellow highlighting.

As requested, an unmarked copy of the above items is being mailed to Mr. Charlie Adams at the TCEQ Region 10 Office in Beaumont. An electronic copy of these items will also be posted on the designated website for the facility.

If you have any questions, comments, or require any additional information regarding this project, please do not hesitate to contact either Bob Staehs, P.E. (Project Manager) or myself at (936) 634-5528.

Sincerely,



Craig Largent

encl.

cc: Ms. Stacy Wershing, Owner - R&J Recycling and Disposal
Mr. Charlie Adams - TCEQ Region 10 Office



Texas Commission on Environmental Quality
Waste Permits Division Correspondence Cover Sheet

Date: March 9, 2022

Facility Name: R&J Recycling and Disposal Medical
Waste Facility

Permit or Registration No.: 40325

Nature of Correspondence:

Initial/New

Response/Revision to TCEQ Tracking No.:
27263576 (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 checked="" type="checkbox"/> Other: Response to NOD dated 03-09-2022	

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:	

Texas Commission on Environmental Quality
Application for a Medical Waste Registration
R&J Recycling & Disposal Medical Waste Facility

Registration 40325

Center, Shelby County, Texas

Initial Application Date: 10/21/2021

Application Revision Date: 03/09/2022

Prepared for

Stacy Wershing (Owner/Operator)

306 FM 2468

Center, Texas 75935

Prepared by

Bob Staehs, P.E.

Everett Griffith, Jr. & Associates, Inc.

Firm No. F-1156

408 North Third Street

Lufkin, Texas 75902



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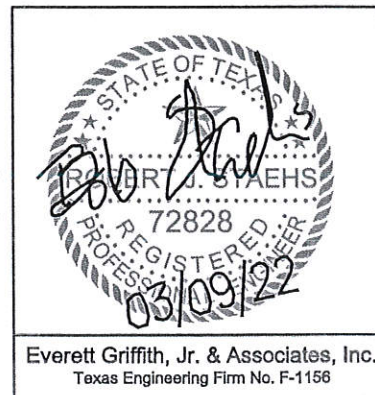
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Section 6—Applicant Certification and Signature

The applicant is the person or entity who would be the owner of the facility and in whose name the registration would be issued. If the application is signed by an authorized representative for the applicant, the applicant must complete the delegation of signature authority.

Certification by Applicant or Authorized Signatory [30 TAC §305.44]

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 of applicant, or other person authorized to sign: Stacy Wershing

Title of person signing: Owner

Signature: [Signature] Date: 03-09-2022

Notarization

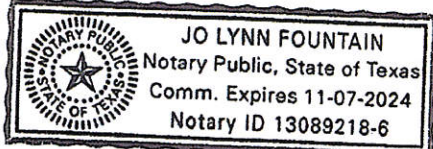
SUBSCRIBED AND SWORN to before me by the said Stacy Wershing

On this 9th day of March, 2022

My commission expires on the 7 day of November 2022

[Signature]
Notary Public in and for

Shelby County, Texas



Applicant's Delegation of Signature Authority [30 TAC §305.43]

I hereby delegate the person named below as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and appear for me at any hearing or before the Commission 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.

Name of applicant's representative: N/A

Name of person who is the applicant, or officer or official representing corporation or public agency that is the applicant: N/A

Signature: N/A Date: N/A

Notarization

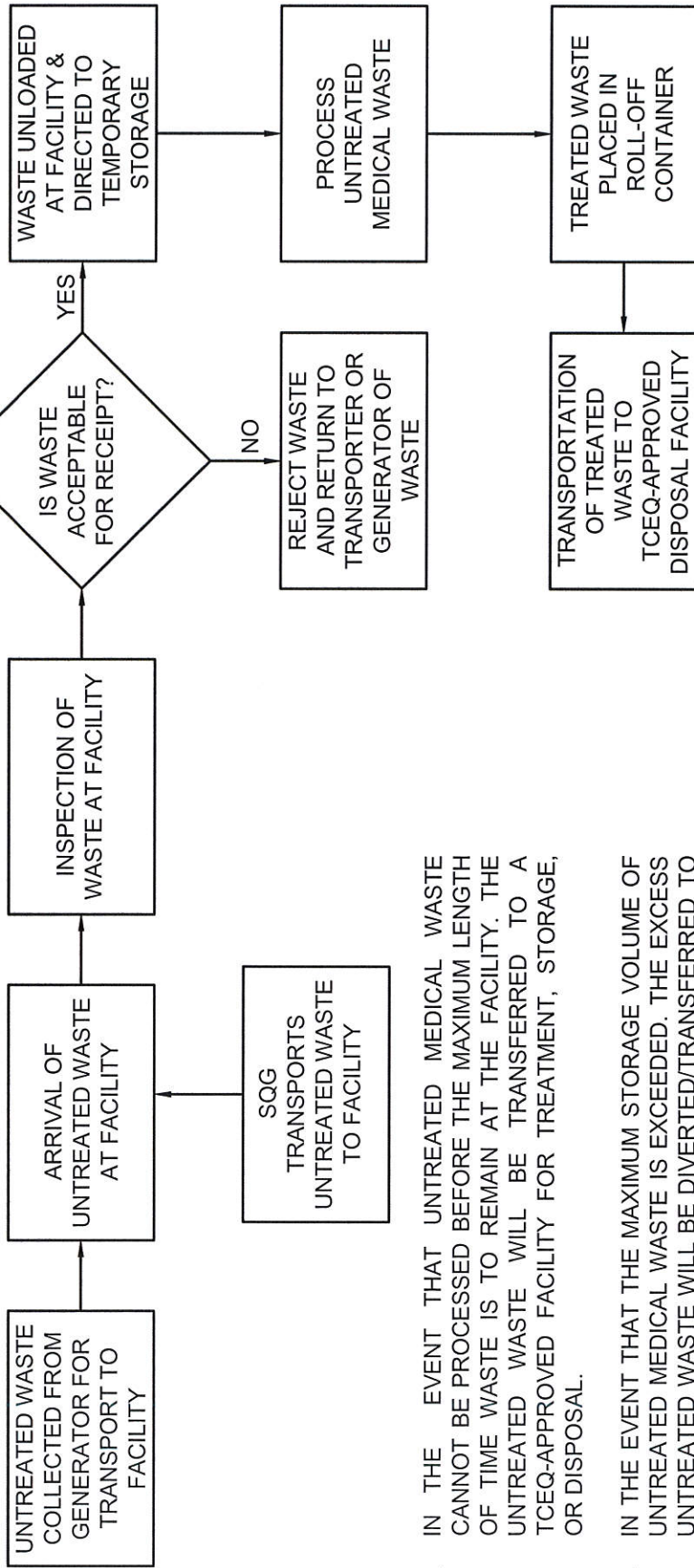
SUBSCRIBED AND SWORN to before me by the said N/A

On this N/A day of N/A

My commission expires on the N/A day of N/A, N/A.

N/A
Notary Public in and for

N/A County, Texas



1. IN THE EVENT THAT UNTREATED MEDICAL WASTE CANNOT BE PROCESSED BEFORE THE MAXIMUM LENGTH OF TIME WASTE IS TO REMAIN AT THE FACILITY. THE UNTREATED WASTE WILL BE TRANSFERRED TO A TCEQ-APPROVED FACILITY FOR TREATMENT, STORAGE, OR DISPOSAL.
2. IN THE EVENT THAT THE MAXIMUM STORAGE VOLUME OF UNTREATED MEDICAL WASTE IS EXCEEDED. THE EXCESS UNTREATED WASTE WILL BE DIVERTED/TRANSFERRED TO A TCEQ-APPROVED FACILITY FOR TREATMENT, STORAGE, OR DISPOSAL
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4. "WASTE" INCLUDES MEDICAL WASTE AS DEFINED IN 30 TAC 326.3(23), TRACE CHEMOTHERAPEUTICAL WASTE, AND NON-HAZARDOUS PHARMACEUTICAL WASTE.
5. THE UNTREATED MEDICAL WASTE WILL BE PROCESSED AS A SINGLE STREAM.



**R&J RECYCLING AND DISPOSAL
MEDICAL WASTE FACILITY**

PROCESS FLOW DIAGRAM

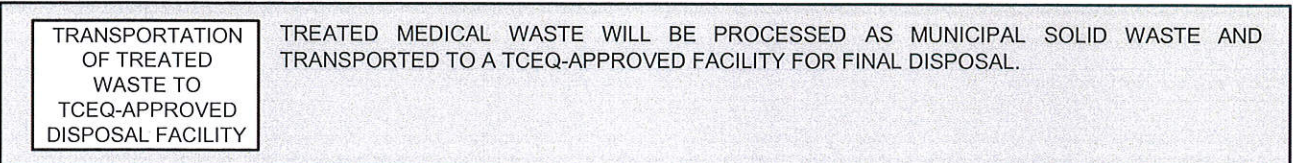
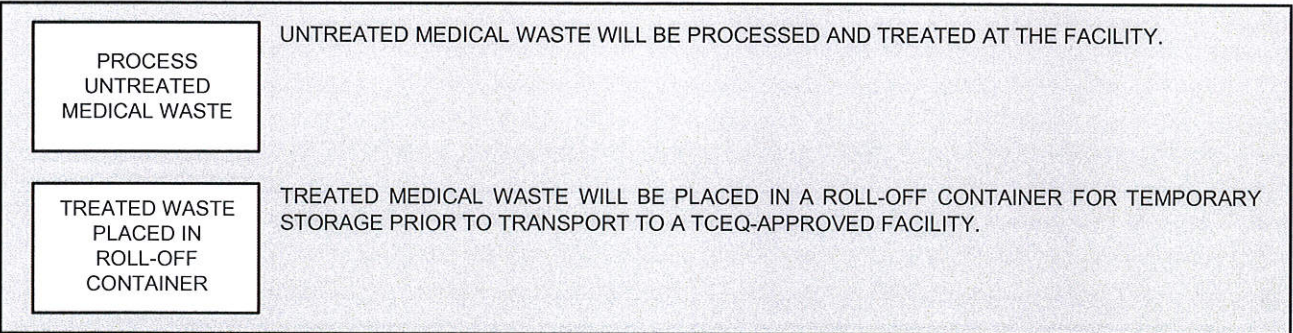
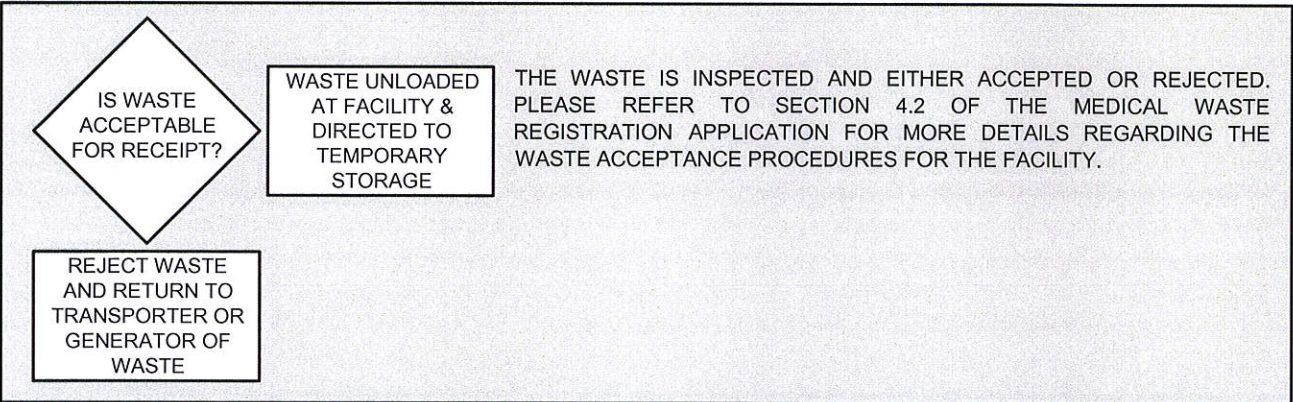
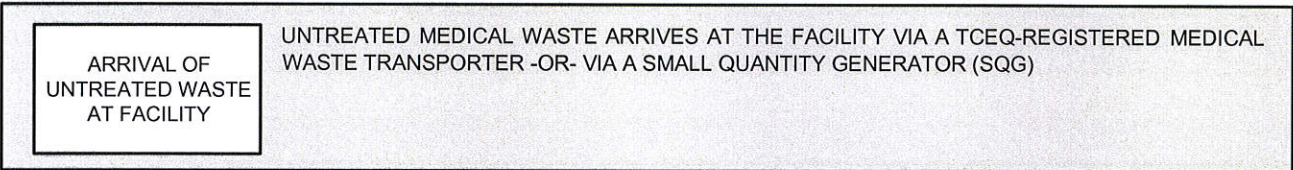
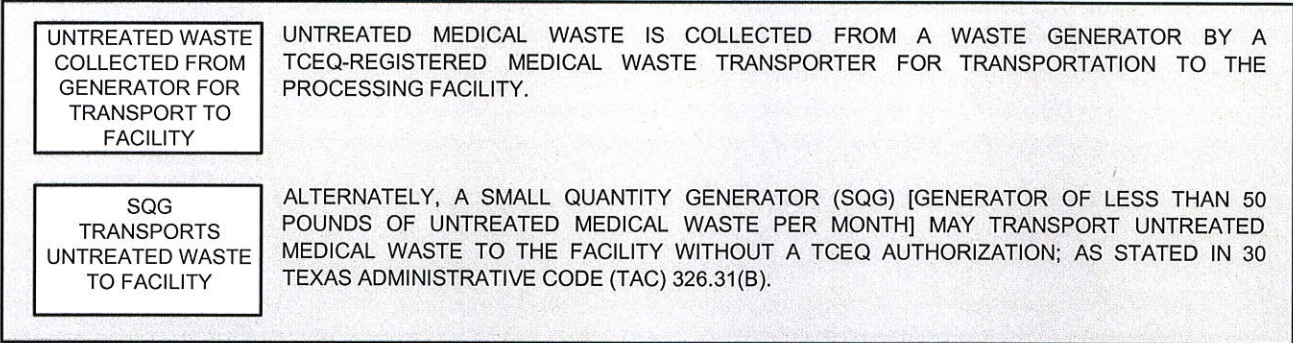


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EVERITT GRIFFITH JR. & ASSOCIATES, INC.
 408 North Third Street
 Lufkin, Texas
 936/634-5528

DESIGNED BY:	N/A	CHECKED BY:	BS	SCALE:	N/A	1
DRAWN BY:	FJA/TCL	APPROVED BY:	BS	DATE:	10/06/2021	OF 1
TEXAS ENGINEERING FIRM No. F-1156			REV 03/09/2022			

ATTACHMENT 7 NARRATIVE FOR PROCESS FLOW DIAGRAM

THE PROCESS FLOW DIAGRAM ILLUSTRATES THE STORAGE, PROCESSING, TRANSFERRING, AND DISPOSAL SEQUENCES FOR THE MEDICAL WASTE ANTICIPATED AT THE PROPOSED R&J MEDICAL WASTE FACILITY. THE UNTREATED MEDICAL WASTE WILL BE PROCESSED AS A SINGLE STREAM. THE FOLLOWING NARRATIVE IS PROVIDED FOR EACH ELEMENT IN THE PROCESS FLOW DIAGRAM:



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Application for a Medical Waste Registration
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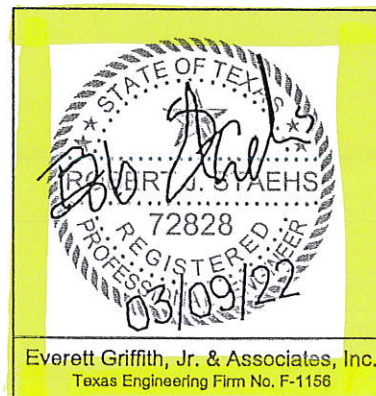
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Certification by Applicant or Authorized Signatory [30 TAC §305.44]

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 of applicant, or other person authorized to sign: Stacy Wershing

Title of person signing: Owner

Signature: [Signature] Date: 03-09-2022

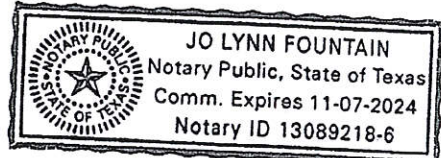
Notarization

SUBSCRIBED AND SWORN to before me by the said Stacy Wershing

On this 9th day of March, 2022

My commission expires on the 7 day of November 2022

[Signature]
Notary Public in and for Shelby County, Texas



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I hereby delegate the person named below as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and appear for me at any hearing or before the Commission 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.

Name of applicant's representative: N/A

Name of person who is the applicant, or officer or official representing corporation or public agency that is the applicant: N/A

Signature: N/A Date: N/A

Notarization

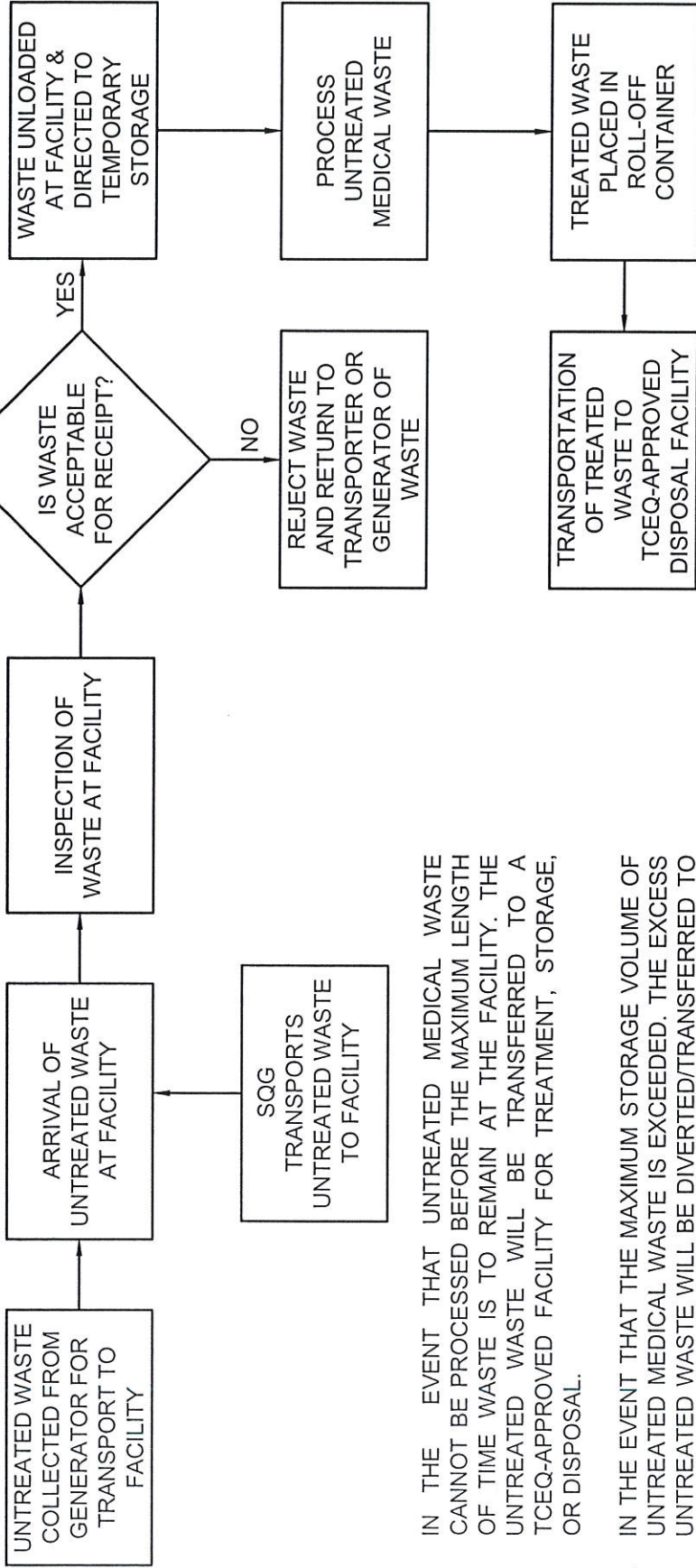
SUBSCRIBED AND SWORN to before me by the said N/A

On this N/A day of N/A

My commission expires on the N/A day of N/A, N/A.

N/A
Notary Public in and for

N/A County, Texas



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408 North Third Street
Lufkin, Texas
936/634-5528

TEXAS ENGINEERING FIRM No. F-1156

DESIGNED BY:	N/A	CHECKED BY:	BS	SCALE:	N/A	DATE:	10/06/2021
DRAWN BY:	FJATCL	APPROVED BY:	BS				REV 03/09/2022
							1 OF 1



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