

**Peach Creek Environmental Park  
PC-II, LLC**

February 29, 2024

Ms. Megan Henson  
Manager  
Municipal Solid Waste Permit Section (MC-124)  
Texas Commission on Environmental Quality  
12100 Park 35 Circle, Bldg F  
Austin, TX 78753

**RE: Peach Creek Environmental Park Permit Application  
San Jacinto County, Texas  
Municipal Solid Waste (MSW) – Permit No. 2406  
Response to Comments Dated October 13, 2023  
RN110843024/CN605694611**

Dear Ms. Henson:

On behalf of PC-II LLC, enclosed are the reply to comments from Frank Zeng's email dated October 13, 2023, regarding the above referenced permit application. Below are the comments and the reply immediately following the comment.

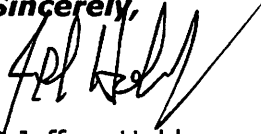
1. Per 330.61(c)(5), revise Section 8.1 to briefly describe the road conditions of the primary access roads (number of lanes, surface type, etc.), including the proposed private access driveway. Note the private driveway needs to be an all-weather road per 330.153(a). (The road conditions were included in the application dated October 11, 2021.) **Part II, Section 8.1 has been revised to note the all-weather access driveway and reference the more detailed description in Attachment D, Section 3.1. Attachment D, Section 3.1 was also revised to reference the updated Traffic Impact Analysis.**
2. Revised Section 8.1 states that the coordination with TxDOT's Lufkin District is included in Appendix B. Submit new coordination that also addresses the information on the relocated site access entrance location/roadway connection. Also, per 330.61(i)(4), submit coordination with the responsible entity for authorizing the driveway connection from the private road to the public Fostoria Tram Road, or revise to indicate that this driveway connection authorization will be obtained from the responsible entity and identify the responsible entity. **Appendix B has been updated to include the recent correspondence with TxDOT's Lufkin District. Section 8.1 has been revised to show the San Jacinto County Commissioner's Court has approved the connection of the PC II site access driveway and Fostoria Tram Road.**
3. The submittal indicates that the updated Appendix L (Traffic Impact Study/Analysis and TCEQ 20719 form) will be submitted separately. Please submit the updated Appendix L. **A revised Traffic Impact Analysis, dated January 25, 2024, and TCEQ Form 20719 have been included as Appendix L.**

4. The southeast corner of the site depicted in some revised drawings (for example, but not limited to, Drawings C1.5 and C1.7) is different than other drawings (for example, but not limited to, Drawing D1.4). Revise the drawings and, if applicable, text (including metes and bounds) for consistency. **Revised drawings C1.5, C1.6, C1.7 and C1.8 have been included to address the above comments.**
5. Pages D7-6 and D7-7 of Attachment D7 are revised to state that a slurry wall is proposed to be constructed around the waste disposal area and that the slurry wall will reduce the volume of water removed during the dewatering operations. Revise page D7-7 to clarify if the previously proposed dewatering systems will be completely enclosed by the proposed slurry wall and revise the dewatering plan/systems as necessary. **D7-7 has been updated to state that the slurry wall will fully enclose any required dewatering systems. No change to the dewatering plan is necessary. These systems are proposed to be constructed, as needed, during cell construction.**
6. Clarify if the proposed slurry wall will have impact on the landfill slope stability and revise the application as necessary if slope stability impact is expected. **The PCI-II permit team does not believe the proposed slurry wall will have any impact on any of the slope stability calculations in the permit application.**
7. The proposed slurry wall needs to be shown on all geology report cross-sections where present and all permit figures that show the groundwater monitoring system to illustrate the planned wall depths and relation to the monitoring/observation wells. **The slurry wall information, including cross-sections, is provided in the February 22, 2024, Slurry Wall Plan, which is added as Attachment K. The slurry wall location is also provided on plan views in relation to the proposed point of compliance on the Proposed Groundwater Monitoring System drawing (F1.1) and the Landfill Gas Monitoring Probe Plan (G1.1).**
8. Include procedures for the construction of the slurry wall, including engineering drawings and specifications. Provide a discussion on adjustments that may be needed to the slurry composition due to encountered moisture content variations or other obstacles. Include discussions on how significant caving and removal of the loose sands in Stratum II will be prevented which could jeopardize the stability of the ground adjacent to the slurry wall. **The Slurry Wall Plan, added as Attachment K, establishes includes standards, testing, and construction quality requirements that will be followed during construction of the slurry wall.**
9. The application states that the slurry wall will be installed outside of the monitoring well network, but with no discussion of how close to the wells it will be installed. Please discuss how the slurry wall will be installed through the same groundwater zone that the wells will be screened in without the slurry solidifying the aquifer near the wells and preventing the wells from being able to properly obtain samples from that groundwater zone. **Additional information has been added to Attachment F, Section 3 to address the above comments.**
10. The geotechnical report states that it is a draft and that additional testing was ongoing. The final report is required prior to a final determination of technically complete. **The final report has been included as Attachment K.**
11. Revise to clarify if the gas probes will also be enclosed by the proposed slurry wall and at what distance from the wall. Please also explain how the gas probes within the slurry wall will function as required by the rule. **Additional information has been added to Attachment G, Section 2 to address the above comments.**

Enclosed please find four copies (one signed original and three copies) of the revisions to the above referenced permit application, and a redline version showing the changes.

Upon receipt and review of this information, should you or any member of your staff have any questions or need additional information, please let me know.

**Sincerely,**

A handwritten signature in black ink, appearing to read "Jeffery Hobby", written over a horizontal line.

Jeffery Hobby  
Project Manager  
PC-II, LLC

CC: TCEQ Beaumont, TX Regional Office, Attn: Waste Manager  
Mr. Wirt A Yerger, III, PC-II LLC  
Mr. Brent W Ryan, McElroy, Sullivan, Miller & Weber, LLP