



September 16, 2024

Gwen Ricco
Texas Commission on Environmental Quality
Office of Legal Services, MC 205
P.O. Box 13087
Austin, Texas 78711-3087

Re: Non-Rule Project Number 2023-134-OTH-NR

Dear Ms. Ricco,

Harris County Pollution Control Services (PCS) respectfully submits the following comments for the proposed renewal and revision of the Municipal Solid Waste Landfill (MSWL) General Operating Permit (GOP) Number 517.

PCS inspects facilities in Harris County for compliance with environmental laws and regulations, reviews permit applications, and submits comments to the Texas Commission on Environmental Quality (TCEQ) on permitting actions. PCS also works closely with the TCEQ's Houston Region 12 office, which refers a substantial number of environmental complaints, including nuisance complaints, from Harris County citizens to PCS. PCS then investigates these complaints and, when appropriate, issues Violation Notices and refers cases to the Harris County Attorney's Office or District Attorney's Office for civil or criminal enforcement.

Below is a list of comments and concerns identified by PCS.

- 1. Based on the review of the proposed 30 TAC §122.517, Municipal Solid Waste Landfills in post-closure care that are a major source are not explicitly included in the proposed renewal and revisions.**

PCS Comment/Recommendation

PCS is concerned that Municipal Solid Waste Landfills in post-closure care are not explicitly addressed in this or another GOP. This is concerning because Municipal Solid Waste Landfills in post-closure care might be (or become) a Major Source of air pollution.

PCS is recommending that municipal solid waste landfills in post-closure care are explicitly included in this GOP, including requirements for compliance with 30 Texas Administrative Code (TAC) 330 Subchapter K.



PCS appreciates the opportunity to submit these comments for your consideration. Should you or other TCEQ staff have questions, please contact Herman Rogers at (713) 274-6237 or by email at herman.rogers@pcs.hctx.net

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Babin', written in a cursive style.

Dr. Latrice Babin
Executive Director

EBC/WOL/HFR/BT

cc: Kaylee Stephenson - Harris County Judge's Office
Zac Nguyen - Harris County Judge's Office
Mikayla Panariello - Harris County Judge's Office
Sarah Utley - Harris County Attorney's Office
Nicole Bealle - TCEQ Region 12
Maureen Haver - Harris County Precinct 1
Alan Deleon- Harris County Precinct 1
Kristen Lee - Harris County Precinct 2
Bruce High - Harris County Precinct 3
Trevor Nolley - Harris County Precinct 4
Nikhat Jhari Noorani- Harris County Precinct 4