

Texoma Council of Governments

Volume II: Regional Solid Waste Management Plan Implementation Guidelines

For the period
2002 -2022



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EXECUTIVE SUMMARY

Requirements

Each of the State's 24 Councils of Governments (COG) is required to develop a regional solid waste plan that conforms to the State's solid waste plan. In the Texoma area, the Texoma Council of Governments (TCOG) is the responsible agency for developing those plans. In 1995, the Texas Natural Resource Conservation Commission (TNRCC) approved the plan developed by TCOG. Effective September 1, 2002 the TNRCC has changed its name to Texas Commission on Environmental Quality (TCEQ).

A new state solid waste management plan, Solid Waste Management in Texas – Strategic Plan 2001-2005 (SFR-40), was published in December 2000. The revised State plan outlines policy goals, objectives, and recommendations for action by the TCEQ and regional/local entities, and includes direction and priorities to be incorporated into the regional solid waste management plans. In light of the direction in the new state solid waste management plan, the TCEQ determined that all of the regional solid waste management plans need to be amended to comply with the revised state plan.

In February 2002, TCOG retained Biggs and Mathews Environmental (BME) to update the regional plan and to prepare the finalized plan for submittal to the TCEQ.

The plan amendment process must be guided by a solid waste advisory committee (SWAC). Per the regulations, the SWAC must represent a broad range of interests, including a representative of the TCEQ, public officials, private operators, citizen groups, and interested individuals. TCOG has an established committee that advises TCOG on environmental issues. The Natural Resource Advisory Committee (NRAC) acts as the regional solid waste advisory committee, as required by 30 TAC 330.565.

The NRAC is responsible for developing recommendations regarding the implementation of the Texoma Regional Solid Waste Management Plan in the tri-county area. This committee is also responsible, under the Interlocal Contract between TCEQ and TCOG, for providing input to TCOG in review of solid waste facility permit applications, for implementing certain recommended items in the Texoma Regional Solid Waste Management Plan and for reviewing and selecting annual grant application from eligible entities.

The plan being developed must include an update to the regional solid waste goals and it must provide a prioritization of those goals. In addition, the State has required that certain goals be added to each of the COGs plans.

Existing Plan Status

The existing TCOG plan had four major goals and a total of 55 individual objectives

- Goal 1 – Adequate Disposal and Transportation Capacity
- Goal 2 – Recycling and Waste Minimization
- Goal 3 – Illegal Dumping
- Goal 4 – Solid Waste Management Systems

A review of the status of the existing plan shows that about 33 of the 55 objectives have been substantially met by the region. Goal numbers 1 and 4 have achieved the most objectives, while goal numbers 2 and 3 have achieved the least.

With the development of two major municipal solid waste facilities, the region's disposal capacity will be ensured well beyond the 20-year planning period; thus Goal 1 is largely satisfied. The solid waste management systems set out in Goal 4 have largely been met.

Goal 2 (Recycling) and Goal 3 (Illegal Dumping) have the largest number of unsatisfied goals. Based on that and that the input from the region has focused on those two needs, several goals have been proposed to update the plan. Also we have recommended removing certain goals.

The NRAC committee recommended and the Governing body concurred that certain goals be removed from the plan if they were redundant or no longer applicable to the solid waste structure in the region. The status of existing goals and identification of new goals are shown on Table 4-1.

NRAC Workshops

During the development of the TCOG Regional Solid Waste Management Plan Update, NRAC committee workshops that were open to the public were held across the TCOG service area to discuss solid waste management in the region. Meetings were held in Gainesville (Cooke County), Bonham (Fannin County), and Sherman (Grayson County) on April 25, 2002. A variety of methods were used to encourage the widest possible participation in these workshop meetings including the use of notice to regional governments, notice to NRAC members, and notice printed in regional newspapers.

Prior to the workshops, questionnaires were distributed to each of the 33 member cities. Information from these questionnaires was used to update

specific portions of the plan. Additional information was obtained from several private waste haulers in the region.

Public Hearing

TCEQ rules regarding the plan update require that a public hearing must be held to allow the opportunity for the public to provide comments or suggestions regarding the update to the plan. The hearing was held August 6, 2002 at 3:00pm at the TCOG offices in Sherman. A total of 3 persons attended the hearing and offered no comment to the plan.

Revised Goals

Based on the information contained in the returned questionnaire and opinions expressed in the workshops and by NRAC committee members, the most important issue facing the Texoma Area is related to Illegal Dumping. Illegal dumping and recycling are also emphasized in the State mandated goals.

The region's goals are shown on the attached table and have been color-coded based on the status of each goal. Those colors are as follows: Green – Goal Accomplished, Blue – New Goal including those mandated by the state and those developed in workshops, and Yellow – Goal needs further evaluation.

The update plan has the same four primary goals the original plan containing 55 subgoals:

- Goal 1 – Adequate Disposal and Transportation Capacity
- Goal 2 – Recycling and Waste Minimization
- Goal 3 – Illegal Dumping
- Goal 4 – Solid Waste Management Systems

As required by the state, each of the goals has been prioritized as indicated in the table under the column entitled "Grant Priority." The prioritization is based on the overall status of each of the 4 main goals. For instance, Goal 1, Assuring Adequate Levels of Disposal has been largely satisfied, thus any outstanding goals in that category have been assigned the lowest priority.

The update plan has a total of 60 subgoals. This results from adding 15 new subgoals and removing 10 outdated subgoals. The new subgoals are detailed below.

TCOG Approval

Following approval of the revised plan by TCOG's Natural Resources Advisory Council on August 13, 2002, the governing body of TCOG approved the updated plan by resolution at their regularly scheduled meeting on August 15, 2002. A copy of the resolution is included at the front of this document.

GOAL 1	Regionally, assure adequate levels of transportation and disposal capabilities
<i>Subgoal 1.6</i>	Establish voluntary pre-application review, public participation procedures through existing solid waste advisory committees
<i>Subgoal 1.7</i>	Identify the factors that should be used to evaluate a permit application for conformance with the regional plan
<i>Subgoal 1.8</i>	Establish clearly defined processes for how conformance recommendations will be made to the TCEQ
<i>Subgoal 1.9</i>	Consider integrated waste management options, as well as the use of Type IV landfills, to ensure the availability of Type I disposal capacity

GOAL 2	Develop local source reduction, waste minimization, reuse, recycling and composting programs to conserve disposal capacity and resources
<i>Subgoal 2.8</i>	Identify where deficiencies exist in the collection and/or marketing of used oil and tires, and outline regional and local alternatives for dealing with these materials
<i>Subgoal 2.9</i>	Consider facilitating cooperative contracting agreements between local governments to help collect & recycle these materials
<i>Subgoal 2.10</i>	Identify the status of local governmental entities' compliance with requirements to establish programs for the separation & collection of recyclables from governmental facilities

GOAL 3	Develop programs to assist regional and local entities in controlling and stemming illegal and improper disposal practices
<i>Subgoal 3.11</i>	Evaluate possibility of counties establishing licensing for waste hauling companies
<i>Subgoal 3.12</i>	Evaluate possible funding for environmental coordination officers for each county
<i>Subgoal 3.13</i>	Continue to track costs of illegal dumping

GOAL 4	Develop regional cost-effective, efficient and environmentally suitable solid waste management systems
<i>Subgoal 4.14</i>	Report on the status of implementing their regional plans, through biennial reports to the TCEQ
<i>Subgoal 4.15</i>	Establish priorities for use of solid waste grant funds which, once approved, will form the basis for regional solid waste grant funding decisions
<i>Subgoal 4.16</i>	Target areas with critical needs for development of a local solid waste management plan
<i>Subgoal 4.17</i>	Address whether further assessments are needed to determine risks posed by closed landfill sites in their regions
<i>Subgoal 4.18</i>	The COGs' solid waste grant funding decisions should be directly tied to implementation of the regional solid waste management plans

1 PLAN PURPOSE AND SCOPE

1.1 Introduction

Per 363.062(a), Texas Health and Safety Code, each of the state's 24 Councils of Governments (COG) is required to develop a regional solid waste management plan that must conform to the state solid waste management plan. As provided for under 363.062(e), Texas Commission on Environmental Quality (TCEQ) Regulations, if the TCEQ determines that a regional plan is no longer in compliance with the state solid waste management plan, the TCEQ may request that a COG revise its regional plan. The revised regional plan is to be submitted to the TCEQ within 180 days of the notice by the TCEQ, or the TCEQ may withdraw approval of the plan.

A new state solid waste management plan, Solid Waste Management in Texas – Strategic Plan 2001-2005 (SFR-40), was published in December 2000. The revised state plan outlines policy goals, objectives, and recommendations for action by the TCEQ and regional/local entities, and includes direction and priorities to be incorporated into the regional solid waste management plans. In light of the direction in the new state solid waste management plan, the TCEQ has determined that all of the regional solid waste management plans need to be amended to comply with the revised state plan.

Subchapter O, Chapter 330 (30 TAC 330), TCEQ Regulations, contains the standards for the content of the regional solid waste management plans. In addition, the new state solid waste management plan provided direction regarding specific priorities that must be reflected in the regional plans. These guidelines are intended to assist the COGs to amend their regional solid waste management plans to comply with the direction in the new state solid waste management plan. However, this guidance is not a regulation, and does not take the place of the regulations nor the state solid waste management plan. If there are any differences between the direction in this guidance document and those documents, the regulations and the state solid waste management plan should be followed.

1.2 Natural Resources Advisory Committee

The plan amendment process must be guided by a solid waste advisory committee (SWAC). Per the regulations, the SWAC must represent a broad range of interests, including a representative of the TCEQ, public officials, private operators, citizen groups, and interested individuals. The Natural Resource Advisory Committee (NRAC) acts as the regional solid waste advisory

committee, as required by 30 TAC 330.565 (a) between TCOG and TCEQ as well as State regulations. A current list of NRAC members is listed in Table 1-1

**Table 1-1
Natural Resources Advisory Committee**

Name	Representing
Mike Allison	Owner, North Texas Sample Log
Sara Anderson	Keep Denison Beautiful
Jerry Blacketer	Fannin County Environmental Officer
Jerry Chapman	Greater Texoma Utility Authority
Wally Cullum	Citizen Representative
Marilyn Franks	Keep Denison Beautiful
Bill Goodson	Mayor of Whitewright
Betty Lancaster	Municipal Judge, Bonham
Jim Gray	Director of Public Works, Gainesville
John Gustafson	I.E.S.I.
Cheryl Hare (ex officio)	TCEQ SW Grant Manager
Ben Hatcher	President, First State Bank
Jeffrey Miller	Assistant Director of Public Works, Sherman
Mike Baker	Fire Chief, Bonham
Rodney Nicely	High School Science Instructor, Whitewright
Troy Sellers	TXU Gas and Electric Manager
Ron Selman	Citizen Representative
Dale Sissney	TASWA
George Rowland (Chair)	Austin College
Dana Schroeder	Citizen Representative
Peter Schulze, Ph.D.	Austin College (Biology)
Alan Larsen	Keep America Beautiful, Sherman
Mike Smithson (ex officio)	TCEQ Regional Office
Glenn Taylor	Citizen Representative
Ben Tyler	Owner, Tyler's Landscape
Cynthia Underwood	Citizen Representative
Jerry White	Director of Public Works, Denison
Jim White	Environmental Officer, Grayson County
Ben Bardwell	Grayson County Health Department
Ken Zimmerman	Texas Instruments

The NRAC is responsible for developing recommendations regarding the implementation of the Texoma Regional Solid Waste Management Plan in the tri-county area. This committee is also responsible, under the Interlocal Contract between TCEQ and TCOG, for providing input to TCOG in review of solid waste facility permit applications for conformance with the Plan, for implementing

certain recommended items in the Texoma Regional Solid Waste Management Plan and for reviewing and selecting annual grant applications from eligible entities.

1.3 Planning Process

During the development of the TCOG Regional Solid Waste Management Plan Update, public workshops were sponsored by NRAC and held across the TCOG service area to discuss solid waste management in the region. Meetings were held in Gainesville (Cooke County), Bonham (Fannin County), and Sherman (Grayson County) on April 25, 2002. A variety of methods were used to encourage the widest possible participation in these workshop meetings including the use of notice to Regional governments, notice to NRAC members, and notice printed in Regional newspapers. Copies of the notices are included in the Appendix.

Prior to the workshops, questionnaires were distributed to each of the 33 member cities. Information from these questionnaires was used to update specific portions of the plan. A copy of the questionnaire and a summary of responses to the questionnaire are included in Appendix A.

NRAC held several meetings to discuss proposed changes in the plan which culminated in a meeting on July 9th where NRAC voted on the proposed changes to the plan.

A public hearing was held August 6, 2002 to review the updated plan. At the time of the announcement of the hearing, a draft of the revised plan was distributed to each of the member cities for their comments. No comments on the draft revised plan were received by TCOG. Attendance at the public hearing was limited to 3 people and they chose to make no comment regarding the plan. A copy of the notice for the Public hearing is included in Appendix A.

Finally, the TCOG solid waste advisory committee (NRAC) recommended the revised plan in a vote taken by the committee in a meeting on July 9, 2002. In a meeting of the governing body of TCOG on August 15, 2002, the plan was approved by unanimous vote of the board. The approval and authorization to submit the plan to TCEQ is included at the front of this plan.

2 REGIONAL ANALYSIS

2.1 Population Growth and Patterns

The counties located in the planning area; along with their population estimates according to the 2000 Census is shown in Table 2-1.

**Table 2-1
Population for TCOG Counties**

County	Population
Cooke	36,363
Fannin	31,242
Grayson	110,595

The following estimate of population growth is supplied by the Texas State Data Center, Texas Agricultural Experiment Station, Texas A & M University System. The estimates used are from the Center's Projections of the Population of Texas and Counties in Texas by Age, Sex, and Race/ Ethnicity for 2000 - 2040, which attempts to reflect recent immigration into the planning region.

Several population projections are calculated by the agency. However, they recommend using The One-Half 1990 – 2000 Migration (0.5) Scenario. The 0.5 scenario produces a statewide annual rate of growth of approximately 1.5, percent slower than 1990-2000 but still substantial growth, given the 2000 population base. It thus represents a rate of growth more moderate than the rapid growth of the 1990's but one that produces substantial population growth in the State.

Future population projection for the planning area through the year 2025 is shown in Table 2-2.

**Table 2-2
Population Projections for TCOG Counties**

COUNTY	2000	2005	2010	2015	2020	2025
COOKE	36,363	37,438	38,603	39,856	40,971	41,762
GRAYSON	110,595	114,081	117,732	121,339	124,492	126,895
FANNIN	31,242	32,142	33,226	34,409	35,542	36,494

2.2 Economic Activity

Economic activity in the Region continues to expand according to the patterns that have existed for the past several years. Figures from the Texas Comptroller of Public Accounts show a slight increase in gross sales region wide produced by an essentially flat number of sales points (all industries). Gross business sales for the region are shown in Table 2-3.

**Table 2-3
Gross Business Sales**

County	1998	1999	2000
Cooke	\$769,053,762	\$790,353,334	\$851,329,757
Fannin	\$582,759,518	\$603,217,206	\$588,906,489
Grayson	\$2,233,002,935	\$2,364,152,978	\$2,538,706,891

The Texas Workforce Commission reports unemployment conditions in most of the region as of in the end of 2001 to be equal to the national figures. Unemployment rates for the TCOG Region are shown in Table 2-4.

**Table 2-4
Unemployment Rates for the TCOG Region**

County	Labor Force	Unemployed
Cooke	17,917	4.7%
Fannin	12,091	6.4%
Grayson	50,095	5.4%

3 SOLID WASTE MANAGEMENT SYSTEM

3.1 Identification of Public and Private Management Agencies

Because the TCOG planning region is one of the smallest regions in the State, there are no subregional management agencies. As required by State Law, each city and county in Texas is required to provide solid waste disposal and/or transportation for their citizens. The Texoma Area Solid Waste Authority was chartered in 2000 to provide a solid waste disposal and recycling facility for the region. They are in the final permitting stages for that facility and intend to begin providing those services following issuance of a TCEQ permit.

In addition, as authorized and required by the Texas Solid Waste Disposal Act, the regional Councils of Governments serve as the regional planning agency for development and implementation of regional solid waste plans. In the Texoma Region, The Texoma Council of Governments is that planning agency.

Other than the private Solid Waste facilities listed in this section there are no private agencies with solid waste responsibilities in the region.

Identified below are the Federal and State Agencies that have responsibilities for Solid Waste Management.

**Table 3-1
Public Management Agencies and Responsibilities**

AGENCY	RESPONSIBILITY
<i>Federal Agencies</i>	
Environmental Protection Agency	Regulation development & Enforcement
United States Army Corps of Engineers	Clean Water Act Permitting
U.S. Fish and Wildlife	Endangered Species Permitting
Federal Aviation Administration	Location Restriction Permitting
Federal Emergency Mgmt. Agency	Floodplain Permitting
<i>Texas State Agencies</i>	
Texas Commission on Env. Quality	State Solid Waste Regulatory Agency responsible for solid waste management, water and air quality including permitting, enforcement, plan development, grant funding, and policy.

Texas Department of Transportation	Permitting and enforcement of Highway beautification act.
Texas Historical Commission	Permitting – Preservation of Historically Significant sites in Texas
Regional Agencies	
Texoma Council of Governments	Development and Implementation of Regional Solid Waste Plans and distribution of Solid Waste Grants
Texoma Area Solid Waste Authority	Development of a Regional solid waste disposal and recycling facility

3.2 Waste Generation by Type

Based on data collected during this study, it is estimated that waste generated in the region can be characterized by the following.

Table 3-2

TYPE OF WASTE	PERCENTAGE OF TOTAL
Commercial MSW	58%
Residential MSW	27%
Industrial Waste (Class II & III)	10%
Construction/Demolition (Type IV)	5%

The major classifications of solid waste disposed in the area include household waste; yard waste; commercial waste; Class 2 and Class 3 nonhazardous industrial waste; construction-demolition waste; and some special waste. Wastes accepted include paper, food wastes, glass, aluminum, metals, plastics, grass clippings other organic wastes, wood wastes, textiles, bricks and other inert materials.

Solid waste facilities in the area do not accept Class 1 nonhazardous industrial wastes, regulated hazardous wastes, liquid wastes, radioactive wastes, PCB wastes infectious medical wastes, or other wastes prohibited by TCEQ regulations.

3.3 Volume and Rate of Disposal

The TCOG area serves the communities of Cooke, Grayson and Fannin Counties. Previous municipal solid waste studies of the three-county area have projected the solid waste generation rate to be about 5.4 pounds per capita per day. Based on the population projections in Table 2-2, Table 3-3 depicts the solid waste generation for the region in tons.

**Table 3-3
Solid Waste Generation**

COUNTY	2000	2005	2010	2015	2020	2025
COOKE	32,879	36,895	38,043	39,278	40,377	41,156
GRAYSON	108,991	112,427	116,025	119,580	122,686	125,055
FANNIN	30,789	31,675	32,744	33,910	35,027	35,965
TOTAL	172,659	180,997	186,812	192,768	198,090	202,176

3.4 Current Disposal Capacity

The estimated remaining capacity for Hillside Landfill is 2,100,000 tons with a current site life of 10 years. However, Waste Management has applied for a permit amendment requesting a vertical expansion. The proposed expansion will provide over 10 million cubic yards of additional capacity and will increase the life of the site to 40 years at current disposal rates, based on information provided by Waste Management.

The proposed Texoma Area Solid Waste Authority (TASWA) facility in Grayson County has been designed to provide capacity for the region for 50 years.

The combined proposed capacities of these two facilities would provide disposal capacity for the entire region for more than 50 years. Locations of the two facilities are shown on the Regional map on Figure 1.

3.5 Waste Transfer, Storage, Treatment, and Processing

Two cities, Gainesville and Sherman operate transfer stations within the planning region. Locations of the transfer stations are shown on the regional map in Figure 1.

The Gainesville transfer station currently serves the City of Gainesville and surrounding area with approximately 100 tons per day of solid waste moving through the station. The station was designed to accommodate approximately 250 tons per day with the purchase of an additional 100 cubic yard tractor trailer being necessary to transport the refuse to the landfill.

The Sherman transfer station currently serves the City of Sherman and processes approximately 4100 tons per year.

3.6 Waste Collection and Transportation Services

Private haulers including B & B Equipment, Waste Management and IESI service the planning area. The larger cities of Denison, Sherman and Gainesville operate collection services for their citizens. Denison and Sherman collect trash once a week, while Gainesville collects trash twice per week. Currently, waste from Bonham is being transported outside the region to the B & B Landfill in Lamar County. Denison and Sherman waste is transported to the Hillside Landfill near Luella. Gainesville's waste is transported to its transfer station in Gainesville, transferred to large trucks and then transported outside the region to Camelot Landfill in Dallas County.

Waste collection in the smaller communities and rural areas within the region is primarily provided by the private waste haulers IESI and Waste Management of Texas, Inc. and other private waste haulers

Data regarding waste volume has been compiled from responses to questionnaires from private waste haulers and municipalities and is included in Appendix A.

Based on reviews of the solid waste survey sent to each community and county as a part of this plan amendment process, no areas were identified as having inadequate convenient collection of solid waste. These goals in our plan (1.2 and 1.3) are shown as having been met.

3.7 Recycling and Composting Services

Waste reduction programs have been slow to begin in the region, with a few exceptions. Three cities, Gainesville, Sherman, and Whitesboro sponsor recycling programs.

Gainesville has collection centers where paper, plastic, glass, metal and brush and glass are accepted.

The city of Sherman has curbside collection plus one collection center at a local Albertson's grocery store.

In Whitesboro, materials are collected both curbside and at collection center. Curbside service is provided for residential and picked every other week by IESI.

Continued low market prices for many recyclables have certainly done their part to suppress the development of local recycling programs. More analysis need to be done to identify those specific elements of the regional waste stream that can be recycled at a fully-loaded cost equal- to or less-than landfilling.

No regional communities are operating 'smart buying' or other organized waste minimization training programs for citizens. Regional businesses, however,

appear to continue making positive strides toward waste minimization through better purchasing practices and process recovery of internally generated waste.

Each of the local governments reports that they have established programs for the separation and collection of recyclables in their own government facilities.

In summary, while the city of Gainesville and other cities have made major strides in the management of recycling programs, the situation that was identified in the *Texoma Regional Solid Waste Management Plan* still continues to describe the overall recycling situation in the region:

“The state’s solid waste management hierarchy is not currently reflected in the region’s solid waste management systems. The region’s recycling level is currently minimal, despite the various municipal, civic and private collection efforts. Furthermore, other requirements in state legislation such as those requiring local governments, school districts and other governmental agencies to start recycling programs and give preference in purchasing products made of recycled materials, will need to be implemented.”
Texoma Regional Solid Waste Management Plan, (page II-50).

No public composting facilities yet exist in the region. The TASWA facility has designated an area for composting. Composting may be provided based on incoming waste volumes.

3.8 Automotive Waste

There are 31 facilities within the TCOG region that accept waste oil for recycling. They are shown in Table 3-4.

**Table 3-4
Oil Recycle Facilities**

Permit	Company	Address 1	City	State
C80680	WALMART 185	804 E HWY 82	GAINESVILLE	TX
C83146	AUTO ZONE 1572	1702 E HWY 82	GAINESVILLE	TX
C80078	Chief Auto Parts #22803	117 Grand Ave N	Gainesville	TX
C81347	Gainesville, City of	601 North IH-35 (NOT INSTALLED-wait for notice)	Gainesville	TX
C83159	AutoZone #1572	1702 E Hwy 82	Gainesville	TX
C83178	Chief Auto Parts #30021	1320 North Grand Avenue	Gainesville	TX
C86268	Tractor Supply Company-Gainesville	1311 North Grand	Gainesville	TX
C86596	Enderby Gas, Inc	Hwy 377 North	Whitesboro	TX
C86698	Lucky Lady Oil Company	I-35 & Valley View	Fort Worth	TX
C86926	Hi/LO Auto Supply #323	1321 North Grand	Gainesville	TX

C86931	Hunter's Oil Depot	502 West Hwy 82	Gainesville	TX
C86980	AUTO ZONE 3112	1805 N HWY 121	BONHAM	TX
C82196	Wal-Mart #158	US Hwy 78	Bonham	TX
C82400	McCraw Oil Company	2207 North Center	Bonham	TX
C86993	Hi/LO Auto Supply #361	425 West Sam Rayburn Drive	Bonham	TX
C82179	OLMSTEAD OIL CO	622 E LAMAR	SHERMAN	TX
C82195	WALMART SUPERCENTER 147	405 N US HWY 75	DENISON	TX
C82654	AUTO ZONE 1503	1826 TEXONA PKWY	SHERMAN	TX
C83118	AUTO ZONE 1570	2605 W MORTON	DENISON	TX
C80074	Chief Auto Parts #23021	400 Armstrong South	Denison	TX
C80610	Montgomery Ward LLC, #1663	3201 Texoma Pkwy	Sherman	TX
C81241	Hillside Landfill And Recycling Center	Rt 7 Box 196	Sherman	TX
C82285	Wal-Mart Supercenter #947	401 East Hwy 82	Sherman	TX
C82319	Sam's Club #6350	3333 Hwy 75 North	Sherman	TX
C82617	Passport Oil (Thomason Oil Company)	2007 West Taylor	Sherman	TX
C83060	Douglas Distributing Company	325 East Forest Avenue	Sherman	TX
C86276	Tractor Supply Company-Sherman	3201 North Hwy 75, Suite 101	Sherman	TX
C86795	Grayson County UOCC Precinct 4 - Gordonville	63 Reames Lane	Gordonville	TX
C86796	Grayson County UOCC Precinct 4 - Pottsboro	600 Grayson Avenue	Pottsboro	TX
C86922	Hi/LO Auto Supply #310	1010 South Austin Avenue	Denison	TX
C86992	Hi/LO Auto Supply #358	2317 North Texoma Pkwy	Sherman	TX

3.9 Grease and Grit Trap Waste

There are 23 facilities within the TCOG region that provide collection services for grease and grit trap wastes. The facilities are shown in Table 3-5.

**Table 3-5
Grease and Grit Trap Haulers**

ID	ExpDate	Company Name	Number	Street	City
21656	8/31/2001	Kirk's Vacuum Service	CR	214 off of FM 902	Gainesville
21720	8/31/2001	Gainesville, City of	1001	W California St	Gainesville
21760	8/31/2001	H&H Vacuum Service	523	Cearhett	Gainesville
22481	8/31/2002	John's Septic Tank Cleaning	309	East O'Buch	Valley View
22724	8/31/2002	A-1 Porta Privy	1304	Old Sivells Bend	Gainesville
22448	8/31/2002	Bonham, City of	301	5th	Bonham
22833	8/31/2001	Disposal Services, Inc.	101	Hwy 69 North	Leonard
23059	8/31/2000	Pat's Pump Service	110	West 1st Street	Bonham
20396	8/31/2001	Roto-Rooter	264	Bennett Road	Howe

20669	8/31/2001	Burden Pumping Service	1153	Whiting Road	Bells
20778	8/31/2002	Raborn Septic Service	781	Howard Road	Gordonville
20991	8/31/2001	AAA Septic Pumping & Cleaning	63	Cleve Cole Rd	Denison
21333	8/31/2001	Preston Trash Service, Inc.	Hwy	406 11/2 Miles E of Hwy 120	Pottsboro
22081	8/31/2002	Whitesboro, City of	306	W Main	Whitesboro
22091	8/31/2002	Grayson Pumping Service	112	Pearce Dr	Pottsboro
22242	8/31/2001	Texoma Vacuum Trucks	5	Miles N. of Sadler Tx. Hwy 901	Gordonville
22300	8/31/2001	Pottsboro, City of	416	Franklin Ave	Pottsboro
22454	8/31/2002	Action Rental Center	40	Halliburton Dr.	Bells
22527	8/31/2001	Denison, City of	801	N Travis St	Denison
22538	8/31/2002	Bill Hazelwood, Inc.	4423	Sistrunk St	Sherman
22722	8/31/2002	A-1 Little John	2750	Hwy 406	Pottsboro
23008	8/31/2002	Gilbreath Tank Trucks, Inc.	202	Hwy 377 North	Whitesboro
23022	8/31/2002	City of Bells	101	North Broadway	Bells

3.10 Household Hazardous Waste Services

Annual Household Hazardous Waste (HHW) events have been held in Sherman for the past 7 years. These events have been funded by TCOG (through the TCEQ), the City of Sherman and Grayson County. Over 70 volunteers participated in the events including citizens, and private industry (Texas Instruments and Raytheon) employees.

3.11 Litter and Illegal Dumping

Illegal dumping has been identified as a major solid waste concern for the Texoma Region. TCOG maintains each of the county contacts for illegal dumping on their website. Provisions for online reporting are also available that can be reached 24 hours a day from anywhere in the 3 county area. Citizens who witness an act of illegal dumping or know of a dumpsite are encouraged to call and report the incident. The information is then routed to the appropriate local entity.

Responses to the questionnaires and results of the workshops conducted in each of the three counties did not identify any subregional areas that would benefit from the establishment of special enforcement programs for illegal dumping. The illegal dumping identified by the surveys appears to be widely distributed across the region. The relatively small size of the TCOG area does not lend itself to subdivision beyond the county delineations.

During the course of the plan update process, an attempt was made to collect information to quantify the economic impact of the illegal dumping. While incomplete, the total added to the list thus far is \$90,000. A subgoal was added

to the plan (3.13) to continue to track those costs and develop tools to help the tracking. Table 3-6 shows data related to the cost of illegal dumping in the region.

**Table 3-6
Illegal Dumping Costs**

County/ City	Personnel Cost	Equipment Cost	Disposal Cost	Total
Fannin	No response	No response	No response	N/A
Dorchester	0	0	0	0
Honey Grove				\$1000
Cooke	No response	No response	No response	N/A
Howe				\$100 - \$150
Leonard	\$1596	\$2400	\$3300	\$7296
Lindsay	0	0	0	0
Sadler	0	0	0	0
Savoy	0	0	0	0
Grayson	\$40,000	\$10,000	\$5,000	\$55,000
Sherman				\$25,000
Southmayd	N/A	N/A	N/A	N/A
Trenton	0	0	0	0
Tom Bean	0	0	0	0
Tioga	Unknown	Unknown	Unknown	Unknown
			Total	90,000

Each county received approximately \$13,000 from TCOG to partially fund environmental officers.

3.12 Solid Waste Facilities in the Region

The permitted solid waste facilities in the TCOG Region are listed in Table 3-7 and are shown on Figure 1.

3.12.1 New

The Texoma Area Solid Waste Authority (TASWA) is a solid waste authority formed by the cities of Denison, Gainesville, and Sherman, Texas and the counties of Cooke and Grayson, Texas. It is anticipated that individuals and communities from Cooke and Grayson counties and, at a minimum, the cities of Denison, Gainesville, and Sherman will utilize the facility. The TASWA facility is designed to accommodate municipal solid waste from the entire TCOG area. The TASWA facility permit was approved by the Texas Commission on Environmental Quality on October 31, 2003. The facility is currently under construction and is expected to open during the first quarter of 2005.

3.12.2 Expanded

No facilities have been expanded since the 1999 update. Waste Management has submitted a permit amendment application for a vertical expansion for Hillside Landfill; it is currently in the TCEQ review process.

3.12.3 Planned

There are no currently planned solid waste facilities in the region.

**Table 3-7
Solid Waste Facilities in the TCOG Region**

Facility	Type	Permit/Registration No.	Location
City of Gainesville	Type V Transfer Station	MSW No. 1030	Cooke County
City of Sherman	Type V Transfer Station	MSW No. 1136	Grayson County
TASWA	Type I Landfill	MSW No. 2290	Grayson County
Waste Management Hillside	Type I Landfill	MSW No. 532-A	Grayson County

3.13 Solid Waste Implementation Grants

During the time period of 1995 to 2001 TCOG supplied 62 grant totaling \$503,953.50. From 1999 to 2001 TCOG provided funding for 17 grants totaling \$208,257.80 (Table 3-8). The grants primarily focused on recycling, criminal environmental program and Household Hazardous Waste Collection.

**Table 3-8
Solid Waste Implementation Grants
1999 – 2001**

Grant No.	Recipient; Purpose for Grant	Amount
FY 1999		
99-22-G01	Bonham ISD; Construction of Compost Demonstration/Outdoor Learning Center	2,000.00
99-22-G02	Grayson County; Funding for criminal environmental enforcement program	17,028.00
99-22-G03	Cooke County; Funding for criminal environmental enforcement program	11,180.00
99-22-G04	City of Sherman; Curbside recycling study	13,068.80
99-22-I01	TCOG; Household Hazardous Waste Collection day, October 17, 1998	30,000.00
99-22-I02	TCOG; Regional compost education project and bin distribution to 200 families	3,260.00
99-22-I03	TCOG; Distributed learning resources to regional schools	2,500.00
FY 1999	Total [7 grants]	79,036.80
FY 2000		
00-22-G01	Fannin County; Funding for criminal environmental enforcement program	13,500.00

**Table 3-8
Solid Waste Implementation Grants
1999 – 2001**

00-22-G02	Cooke County; Funding for criminal environmental enforcement program	13,000.00
00-22-G03	Grayson County; Funding for criminal environmental enforcement program	15,576.00
00-22-I01	TCOG; Household Hazardous Waste Collection day, April 29, 2000	20,000.00
FY 2000	Total [4 grants]	62,076.00
FY 2001		
01-22-G01	City of Gainesville; Scales for transfer station	10,000.00
01-22-G02	Grayson County; Funding for criminal environmental enforcement program	13,449.67
01-22-G03	Cooke County; Funding for criminal environmental enforcement program	13,000.00
01-22-G04	City of Pottsboro; Local enforcement equipment	1,700.00
01-22-G05	Fannin County; Funding for criminal environmental enforcement program	13,995.33
01-22-I01	TCOG; Household Hazardous Waste Collection day, April 21, 2000	15,000.00
FY 2001	Total [6 grants]	67,145.00
Total FY1999 - FY2001 [17 grants]		208,257.80

GRANT PROPOSAL REVIEW PROCESS

Proposals will be reviewed by the Natural Resources Advisory Committee of TCOG, using screening and selection criteria developed in cooperation with the TCEQ. The committee consists of representatives of various interests involved in solid waste management in the region, according to TCEQ guidelines.

Screening Criteria

In order for any proposed project to be considered, the following screening criteria must be met. If these screening criteria are not met, the proposed project will receive no further consideration for grant funding.

1. The application must be complete and all application requirements and procedures followed, including requirements to notify private service providers of the proposed project, when applicable.
2. The proposed project must conform to eligible standards, eligible recipient standards, and allowable expense and funding standards, as established by the TCEQ and the TCOG and under all applicable laws and regulations.
3. The applicant must agree to document the results of the project as required by TCOG.

4. The proposed project must be technically feasible, and there must be a reasonable expectation that the project can be satisfactorily completed within the required time frames.
5. The proposed project activities and expenses must be reasonable and necessary to accomplish the goals and objectives of the project. One factor in determining reasonableness of expenses shall be whether comparable costs are proposed for comparable goods and services.
6. The proposed project must be consistent with the approved regional solid waste management plan, and must directly support implementation of the regional plan.

Selection Criteria

If a proposed project meets all of the applicable screening criteria, it will be evaluated by the Natural Resources Advisory Committee of TCOG, using the following selection criteria. There are four sets of selection criteria, each worth up to 25 points, for a possible total score of 100 points.

A. PROJECT DESCRIPTION (25 Points)

- Is there an adequate explanation as to why the proposed project is needed?
- Is the overall goal or objective of the proposed project clearly stated?
- Is there an estimate of the number of people who would be served or benefited by the proposed project?
- Is the geographic area affected by the proposed project clearly described?
- Is the specific waste stream targeted by the project identified?
- Does the project include adequate levels of customer incentives, public education, or public input, as appropriate to the particular project?
- Are all aspects of the proposed project described in sufficient detail to ensure its overall feasibility? If the proposed project includes equipment, has the applicant shown that the specified equipment is appropriate for the work to be performed?
- Are the expected benefits of the proposed project adequately described?

B. WORK PROGRAM (25 Points)

- Are all of the major steps or tasks involved in the proposed project clearly presented and adequately described?

- Are responsible entities for accomplishing each step or task identified?
- Is each step or task described in terms of its effect on the total project budget?
- Is a specific timeframe for completing each step or task provided?

C. PROJECT COST EVALUATION (25 Points)

- Are the total related costs of the proposed project (not just grant expenditures) adequately considered?
- Are the costs of the proposed project presented in unit terms, such as cost per ton, cost per customer, or cost per capita, as applicable?
- Are the costs of the proposed project compared to any established averages, or to normal costs for similar projects?
- Will the proposed project result in a measurable cost savings, or are the costs of the proposed project otherwise reasonably justified?

D. LEVEL OF COMMITMENT OF THE APPLICANT (25 Points)

- Is the applicant providing any level of matching funds or in-kind services?
- To what extent is the applicant requesting funding for salaries or operational expenses?
- If an ongoing service is proposed, to what extent has the applicant demonstrated ability to sustain the program beyond the term of the grant?
- To what extent do the appropriate governing bodies support the proposed project? Are formal resolutions of support attached?
- Has the applicant previously demonstrated a commitment to preferred solid waste management practices, such as implementing other solid waste management projects, being involved in a local or subregional solid waste management plan or study, or becoming a Clean Texas member?
- If the proposed project has received previous grant funding under this program, to what extent does the proposal involve expansion of current services or operations? Has the applicant presented quantifiable documentation of the success of the project in order to warrant further funding? Does the applicant have a good record of past grant contractual performance? Poor performance on past grants may also be considered in reducing the number of points awarded.

GRANT AGREEMENTS

Grant recipients will be required to enter into standard legal agreements with TCOG, to ensure that the approved work program of the project is followed. Among other provisions, the legal agreements will include the following:

- Grant funding will be provided on a reimbursement basis only, and all requests for reimbursement must be handled through the TCOG.
- Grant recipients must agree to provide data related to the results of the project to the TCOG and/or TCEQ. As appropriate to the project, the grant recipient will also be asked to commit to monitoring the results of the project beyond the grant term, and periodically provide TCOG and/or TCEQ additional reports on the status of the project.
- Grant recipients must agree to allow staff of TCOG and/or TCEQ to perform on-site visits to monitor the progress of projects.

3.14 Local Solid Waste Management Plans

The area covered by TCOG is relatively small compared to many other COG areas in Texas and as such we do not anticipate a need to establish subregional areas smaller than county designations.

None of the counties or cities in the TCOG area have established local solid waste management plans. However, all the local government entities are representatives on TCOG's Natural Resource Advisory Committee (NRAC) and as such participated in the development of the plan and provided input to the plan.

The TCOG plan does provide a continued evaluation of the need for the development of special waste plans going forward. Goal 3.4, provides for this continued evaluation.

As stated in goal 4.16, TCOG will continue to evaluate the need for local plans and encourage its member cities to evaluate the need for the development of local solid waste management plans. The development of any local plan must be guided by TCOG, the NRAC, and by the priorities of this regional plan.

4 REGIONAL GOALS AND OBJECTIVES

Table 4-1 is a compilation of the revised goals for the Texoma Area Solid Waste Management Plan and a summary of the activities undertaken to implement the Texoma Regional Solid Waste Management Plan through 2001. This table illustrates the status of goals of the previous Plan and highlights new goals for the Update. Fifteen new objectives have been added to follow the new state plan. Also as stated by the new direction of the state's management plan, TCOG has developed a systematic approach to determine grant priority.

There are a total of 60 recommendations or subgoals in the Texoma Plan, and they are divided into four functional goals:

1. Regionally assure adequate levels of transportation and disposal capabilities.
2. Develop local source reduction, waste minimization, reuse, recycling and composting programs to conserve disposal capacity and resources.
3. Develop programs to assist regional and local entities in controlling and stemming illegal and improper disposal practices.
4. Develop regional cost effective, efficient and environmentally suitable solid waste management systems. Each goal is then divided into four planning periods established in the regulations (current; short-term, 1 to 5 years; intermediate term, 6 to 10 years; and long-range, 11 to 20 years or longer).

The new subgoals are shown in blue on Table 4-1 and in the executive summary. This plan establishes the priorities for use of grant funds by TCOG. Funding provided under the Regional Solid Waste Grants Program must be consistent with the approved regional solid waste management plan. While no specific schedule is proposed for each of the goals, it is anticipated that TCOG and NRAC will be working on each of the goals throughout the planning period. Revisions of individual goal sequencing will likely occur based on new information received by NRAC.

4.1 Plan Priorities

Each goal and subgoal listed in Table 4-1 has been assigned a priority based on the results of the community surveys. For continuity, the organization of Table 4-1 follows the organization of TCOG's original plan from 1993. The goals

are restated below in priority order. The goal number as listed in Table 4-1 is in parentheses.

1. DEVELOP PROGRAMS TO ASSIST REGIONAL AND LOCAL ENTITIES IN CONTROLLING AND STEMMING ILLEGAL AND IMPROPER DISPOSAL PRACTICES (3.0)
 - Education/awareness for citizens discouraging illegal dumping, open burning, and other improper disposal practices (3.1)
 - Education/awareness programs to inform residents about alternatives to hazardous home products (3.2)
 - Education/awareness programs to inform small quantity generators (3.3)
 - Local governments should develop plans for management of special waste (3.4)
 - Institute region "dumpstoppers" hotline and reward system (3.6)

2. DEVELOP LOCAL SOURCE REDUCTION, WASTE MINIMIZATION, REUSE, RECYCLING AND COMPOSTING PROGRAMS TO CONSERVE DISPOSAL CAPACITY AND RESOURCES (2.0)
 - A study to evaluate regional collection, transportation, processing and marketing options (2.1)
 - One yard-waste composting site should be provided in each county at existing landfill sites (2.2)
 - Technical assistance should be provided to local governments, businesses and institutions identifying and implementing source reduction, waste minimization, reuse and recycling strategies, including use of drop off recycling center (2.3)
 - Local Governments and school districts adopt internal source reduction, reuse, recycling and recycled content procurement policies and programs (2.4)
 - Education/awareness programs targeting proper methods or preparing recyclables, encouraging consumers to "precycle" and "buy recycled" (2.5)
 - Education/awareness programs targeting preferred options for yard waste reduction/management (2.6)
 - The amount of MSW diverted from disposal through source reduction, waste minimization, reuse and recycling programs in the Texoma region should be estimated on an annual basis and publicized (2.7)
 - Identify where deficiencies exist in the collection and/or marketing of used oil and tires, and outline regional and local alternatives for dealing with these materials. (2.8)
 - Consider facilitating cooperative contracting agreements between local governments to help collect & recycle these materials. (2.9)

- Identify the status of local governmental entities' compliance with requirements to establish programs for the separation & collection of recyclables from governmental facilities. (2.10)
3. DEVELOP REGIONAL COST-EFFECTIVE, EFFICIENT AND ENVIRONMENTALLY SUITABLE SOLID WASTE MANAGEMENT SYSTEMS (4.0)
- SWAC shall determine the need for establishment of subregional plans (4.3)
 - Report on the status of implementing their regional plans, through biennial reports to the TNRCC. (4.14)
 - Establish priorities for use of solid waste grant funds which, once approved, will form the basis for regional solid waste grant funding decisions. (4.15)
 - Target areas with critical needs for development of a local solid waste management plan. (4.16)
 - Address whether further assessments are needed to determine risks posed by closed landfill sites in their regions. (4.17)
 - The COGs' solid waste grant funding decisions should be directly tied to implementation of the regional solid waste management plans. (4.18)
4. REGIONALLY, ASSURE ADEQUATE LEVELS OF TRANSPORTATION AND DISPOSAL CAPABILITIES. (1.0)
- Consider integrated waste management options, as well as the use of Type IV landfills, to ensure the availability of Type I disposal capacity. (1.9)

4.2 Project Categories

The project categories listed may be eligible for short-, intermediate-, or long-term funding through TCOG's grants program. This is not intended to be an all-inclusive list and the categories may be revised by the NRAC as goals are achieved and priorities change.

- Controlling and Stemming Illegal Dumping (3.0)
 - Education and awareness programs
 - Development of local solid waste plans
 - Fencing, barriers and signs
 - Development of drugstoppers hotline and rewards system
- Litter and Illegal Dumping Cleanup (3.0)
 - Community cleanup activities and events, excluding cleanup of scrap tires
 - Waste removal, disposal or recycling activities

- Placement of trash collection receptacles in public areas where littering frequently occurs
- Source Reduction and Waste Minimization (2.0)
 - Regional studies to evaluate marketing options for regional collection and transportation
 - Studies for marketing of used oil or tires
 - Facilitation of cooperative contracting agreements between local governments to help collect and recycle oil or tires
- Household Hazardous Waste Collection (2.0)
 - Community collection events
 - Collection, recycling or reuse activities
 - Transportation costs associated with collection activities
 - Education and public awareness programs

4.3 Specific Short-term Projects

NRAC approved funding for the following specific projects in the FY 2003/2004 funding period. Funding for these projects directly addresses the first priority goal of assisting regional and local entities to control and stem illegal and improper disposal practices.

- Two-year funding grants for Fannin, Grayson, Cooke counties environmental enforcement officers.
- Funding of PSA for Gainesville.
- Funding for Sherman and Grayson County joint project on documenting environmental enforcement cases through the legal system for Sherman in Grayson County.
- Funding for City of Sherman surveillance camera purchase
- Funding for City of Denison Solid Waste Drop-off Center (2 years)

4.4 Local and Subregional Recommendations

Local entities are encouraged to continue to support the TCOG role in solid waste planning in the region by their continued participation in the COG's NRAC committee and through the regional and local education outreach programs. By their participation in the planning, the local governments have shown their commitment to responsible solid waste management in the region.

4.5 Recommendations for State-Level Action

Texoma Council of Governments would encourage the state to institute a workable tire recycling plan using tires as fuel, materials for dam and road building stabilization, and recycling back to tire manufacturers for re-use.

5 CONFORMANCE REVIEW

By state regulation and its contract with the Texas Commission on Environmental Quality, TCOG is obligated to review permit applications for municipal solid waste management facilities to be located within TCOG's planning region for conformance with the adopted regional solid waste management plan for the region. Additionally, TCOG may perform preliminary review on projects while they are still in the planning stages. The following process was approved by the TCOG Governing Body on February 18, 2000 to be used to render a preliminary determination of conformance of a proposed permitted facility with the Texoma Regional Solid Waste Management Plan.

Additional information on this process may be obtained from the Regional Solid Waste Coordinator, Mark Wedding, at 903/813-3577.

5.1 Conformance Review Process

1. Request applicant to submit a three-page (maximum) description ("Project Description") of the proposed project along with a map showing location of the proposed facility.
2. Circulate copies of the Project Description with copies of the Goals and Recommendations sections of the Texoma Regional Solid Waste Management Plan to members of the Governing Body and Natural Resources Advisory Committee.
3. Post the Project Description on the NRAC website for public review and invite online response to the question "Does the proposed project conform with the Texoma Regional Solid Waste Management Plan?" (Note: Goals and Recommendations already available online.)
4. Place notices in regional newspapers inviting input on the question "Does the proposed project conform with the Texoma Regional Solid Waste Management Plan?"
5. Make a copy of the Texoma Regional Solid Waste Management Plan and the Project Description available for public use at TCOG offices. Copies of the Plan are also available at the public libraries in Bonham, Denison, Gainesville, and Sherman.
6. Receive written comments on the question of conformance from all parties for a period of thirty days.

7. Receive oral comments from the members of the NRAC at a scheduled meeting of that advisory committee on the question of conformance. Comments from the public on the conformance question will also be received at this meeting.
8. Continue to receive oral comments from the public and the members of NRAC at a second scheduled meeting on the question of conformance. Comments from the public on the conformance question will also be received at this meeting. A vote will be taken at this meeting on the preliminary conformance issue.
9. TCOG staff will prepare recommendations from the NRAC's decision and circulate to the governing body prior to a scheduled meeting.
10. The Governing body decides if the proposed project does or does not conform with the Texoma Regional Solid Waste Management Plan
11. Staff will notify the TCEQ or applicant, as appropriate, using the suggested format of the TCEQ.

6 CLOSED LANDFILL INVENTORY

An inventory of closed municipal solid waste landfill units is required to be compiled by each COG and included in the regional solid waste management plan. The TCEQ has provided the COGs with separate guidance for the preparation of the required inventories.

TCOG has placed digital records and maps of all the closed permitted and unauthorized facilities in the region on its website at www.nrac.org/cli/inventory_sites.htm. Over 69 sites were found in the TCOG region. TCOG has not conducted site specific environmental characterization or health based risk assessments of the sites listed in our closed landfill inventory and as such cannot provide any specific information related to potential risks to human health and the environment. However, TCOG is not aware of any specific risks related to sites on the inventory.

The Closed Landfill Inventory is included as Appendix B.

APPENDIX A
Questionnaire and Responses

APPENDIX B

Closed Landfill Inventory