



April 27, 2021

Oklahoma Department of Environmental Quality
Land Protection Division
707 North Robinson Avenue
Oklahoma City, OK 73101-1677

Attn: Ms. Hilary Young, P.E.
Chief Engineer – Land Protection Division

**RE: Response to Draft Permit Comments Notice of Deficiency
Dated December 1, 2020
Tier II Permit Application
City of Ada Transfer Station
Ada, Pontotoc County, Oklahoma
CEC Project No.: 183-660**

Dear Ms. Young:

On behalf of the City of Ada, Civil & Environmental Consultants, Inc. (CEC) is responding to the Draft Permit Comments Notice of Deficiency dated December 1, 2020 from the Oklahoma Department of Environmental Quality (ODEQ) for the Tier II Permit Application that was submitted on August 15, 2019. Comments received from ODEQ as well as CEC's responses are listed below.

- ODEQ Comment No. 1: Aesthetic enhancement. In accordance with Oklahoma Administrative Code (OAC) 252:515-3-37, please provide a detailed aesthetic enhancement plan that addresses the following information, at a minimum:*
- a. The number, type, and size of trees that are proposed to be planted on the northern side of the transfer station property, in addition to any other screening that will improve the visual harmony of the area;*
 - b. How the aesthetic enhancement will reduce the transmission of noise from the facility; and*
 - c. How the aesthetic enhancement will reduce the transmission of dust from the facility.*

Response: We have updated Drawing 17 of the Permit Drawings to show the spacing of the trees/shrubs and we have proposed constructing two site berms. The trees/shrubs will be a relatively fast growing species such as a Bradford Pear or a Junior Giant Thuja Tree. The site berms will be at least 6-feet tall and will be vegetated after construction is completed. There is also an area directly north of the parking lot that will have a professionally designed landscape as it is the main point of focus at the entrance of the facility. All landscaping will be detailed during construction and these drawings will be provided to the ODEQ for review and comment.

ODEQ Comment No. 2: Disclosure statement. Item number 11 of the disclosure statement form requires a list of any legal actions against the applicant or affiliated person resulting in a final agency order or final judgement by a court of record in the ten (10) years preceding the filing of the application. Please submit a revised disclosure statement that adequately answers item number 11.

Response: ODEQ is the regulating authority and the City of Ada has requested this information from ODEQ central records. The City of Ada will forward the information requested in Item No. 11 of the disclosure statement once the records are received.

ODEQ Comment No. 3: Leachate storage. Please provide an estimate of the expected volume of leachate that will be generated at the transfer station. Submit calculations showing that the existing leachate impoundment at the landfill is capable of taking the anticipated amount of additional leachate generated from the transfer station.

Response: Based on discussions with the City of Ada, the transfer station floor and pit will be cleaned daily to remove all trash and debris. The transfer station floor and pit will be washed once per week. Therefore, it is anticipated that the volume of leachate generated on a weekly bases will be approximately 100 gallons. This includes moisture from waste as it is being dumped and processed into the waste transfer trailers.

Furthermore, the City of Ada has determined that the leachate from the transfer station should not be pumped to the leachate storage pond located at the landfill. Instead, they will purchase and install a 5,000 gallon dual-walled above ground

steel tank that will be placed in the general area as shown on Drawings 6, 13 and 17. Based on a leachate generation of 100 gallons per week, the total generated per year would be approximately 5,200 gallons. The 5,000 gallon storage tank will have to be emptied at least once per year in order to handle the annual volume of leachate.

ODEQ Comment No. 4: Air criteria. In accordance with OAC 252:515-19-36(c), please include procedures in the operations plan for preventing the discharge of fugitive dust emissions beyond the property boundaries, specifically addressing dust from aggregate-based roads on site. The procedures should include but not be limited to the frequency of watering roads and which roads will be watered.

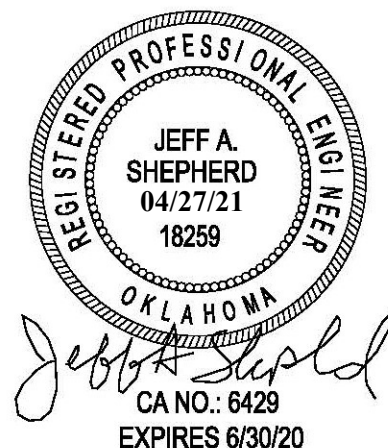
Response: Based on the Permit Drawings, most of the area is paved. The entrance through the scale and down to the transfer station entrance, the road will be paved. The only non-paved roads will be the roads used by the transfer trailer trucks going to the transfer station pit and then out of the transfer station pit. Based on the daily tonnage (approximately 100 tons per day), there will only be about 4 to 5 loads per day moving out of the transfer station. Therefore, the City of Ada will water the aggregate roads at least twice per day or as conditions warrant. Typically, this watering will take place in the morning and in the afternoon.

We trust that these responses meet your requirements. If you have any other questions or comments, please do not hesitate to contact the undersigned either by phone at (405) 463-7607 or by email at jshepherd@cecinc.com.

Sincerely Yours
Civil & Environmental Consultants, Inc.



Jeff A. Shepherd, P.E.
Principal



Response to Draft Permit Comments Notice of Deficiency
Dated December 1, 2020
Tier II Permit Application
City of Ada Transfer Station
Ada, Pontotoc County, Oklahoma
CEC Project No.: 183-660

ATTACHMENT NO. 1
UPDATED PERMIT DRAWINGS



SCALE: 1" = 40'
0 40' 80'

- EXISTING CONTOUR
- - - PROPOSED CONTOUR
- PROPERTY BOUNDARY
- - - CONTAMINATED WATER FLOW PATH
- - - PROPERTY BOUNDARY
- PERMIT BOUNDARY



Civil & Environmental Consultants, Inc.
 4045 NW 64th Street, Suite 415, Oklahoma City, OK 73116
 T (405) 246-9411 www.cecinco.com
 CA #6429, Exp. 06/30/20

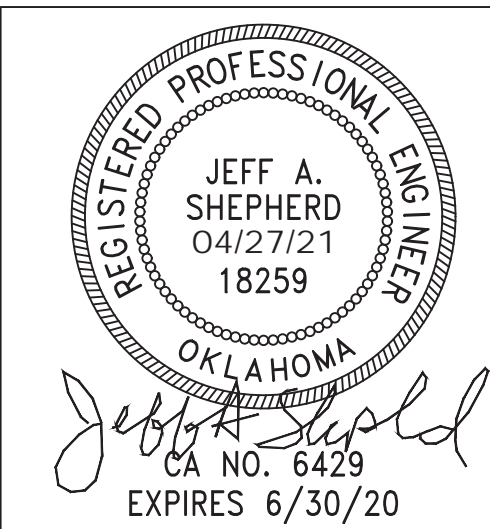
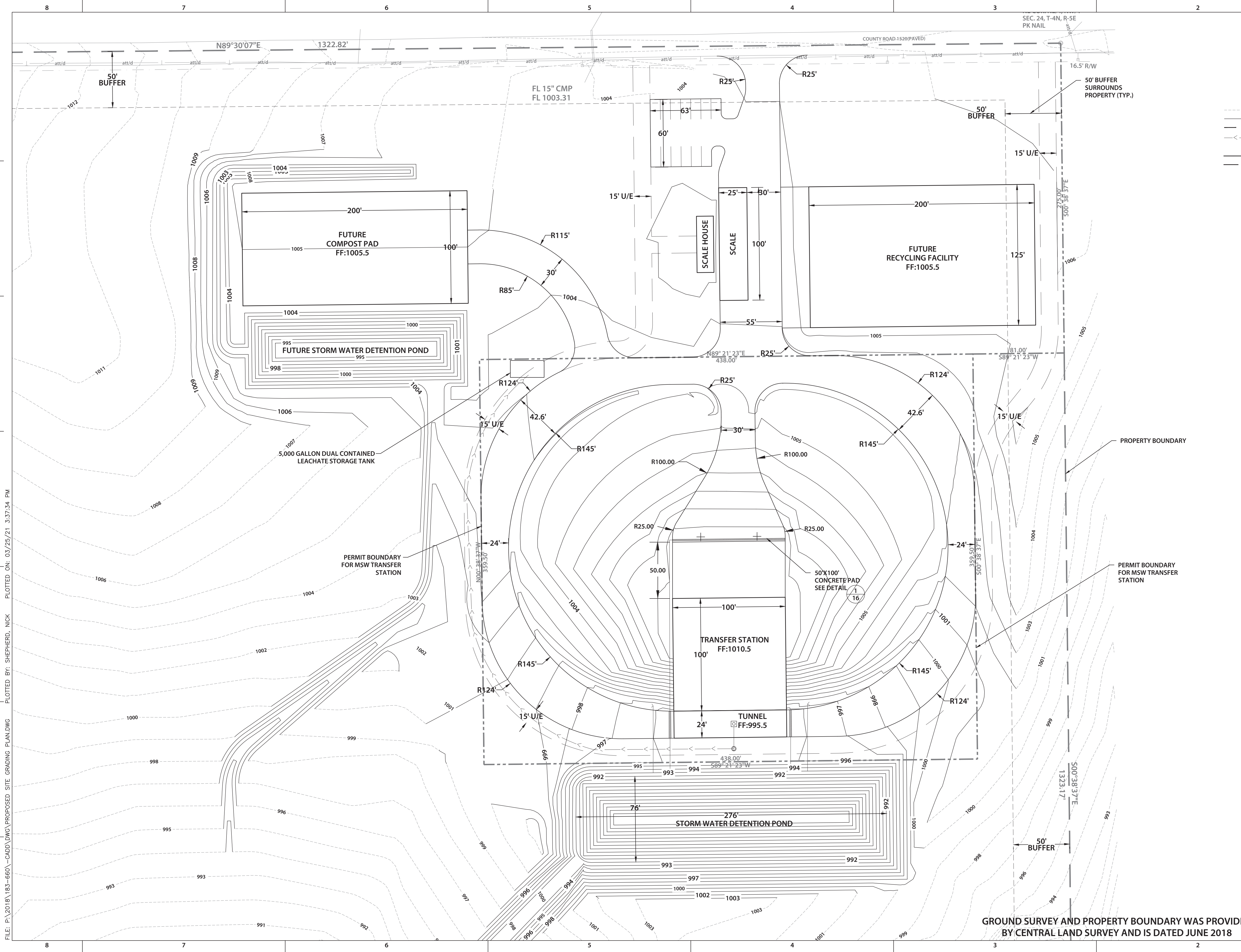
TIER II PERMIT APPLICATION - PERMIT DRAWINGS
 ADA, PONTOCC COUNTY, OKLAHOMA

CITY OF ADA
 231 S. TOWNSEND
 ADA, OKLAHOMA 74820

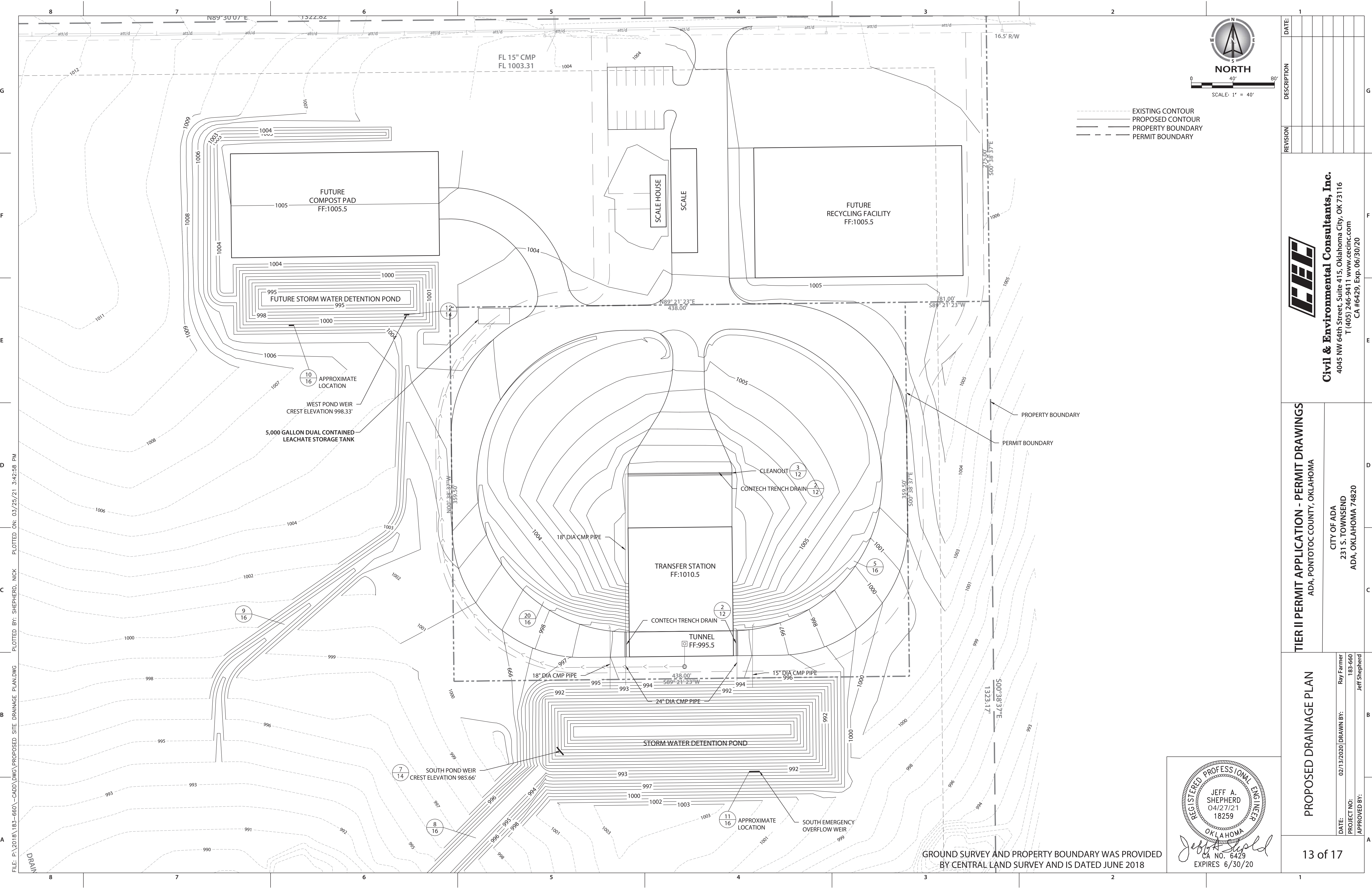
PROPOSED SITE GRADING

6 of 17

REVISION	DESCRIPTION	DATE



JEFF A. SHEPHERD
 04/27/21
 18259
 OKLAHOMA
 CA NO. 6429
 EXPIRES 6/30/20



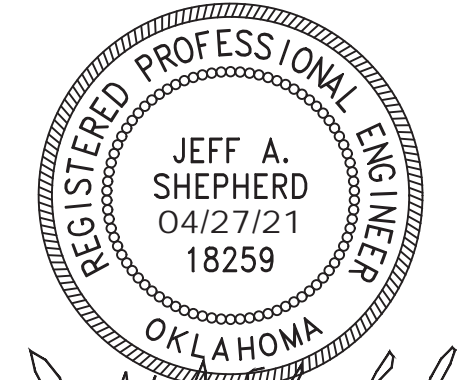
FILE: P:\2018\183-660\CADD\DWG\PROPOSED SITE DRAINAGE PLAN.DWG PLOTTED ON: 03/25/21 3:42:58 PM
 PLOTTED BY: SHEPHERD, NICK

REVISION	DESCRIPTION	DATE

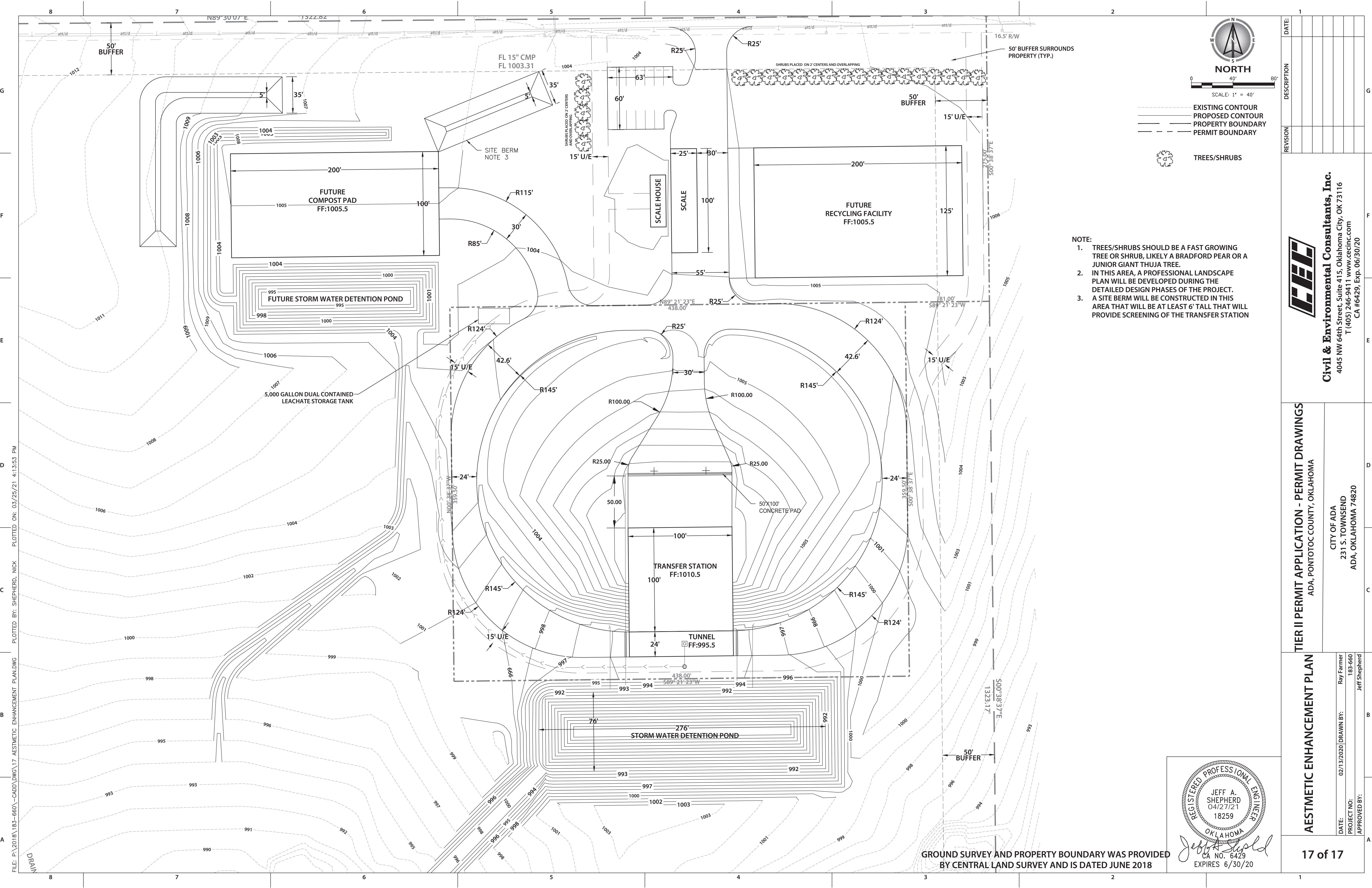

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TIER II PERMIT APPLICATION - PERMIT DRAWINGS
 ADA, PONTOTOC COUNTY, OKLAHOMA
 CITY OF ADA
 231 S. TOWNSEND
 ADA, OKLAHOMA 74820

PROPOSED DRAINAGE PLAN
 DATE: 02/13/2020 DRAWN BY: Ray Farmer
 PROJECT NO: 183-660 APPROVED BY: Jeff Shepherd



GROUND SURVEY AND PROPERTY BOUNDARY WAS PROVIDED BY CENTRAL LAND SURVEY AND IS DATED JUNE 2018



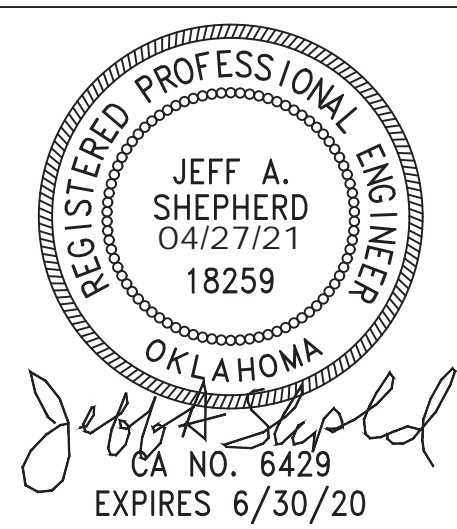
EXISTING CONTOUR
 PROPOSED CONTOUR
 PROPERTY BOUNDARY
 PERMIT BOUNDARY



- NOTE:
- TREES/SHRUBS SHOULD BE A FAST GROWING TREE OR SHRUB, LIKELY A BRADFORD PEAR OR A JUNIOR GIANT THUJA TREE.
 - IN THIS AREA, A PROFESSIONAL LANDSCAPE PLAN WILL BE DEVELOPED DURING THE DETAILED DESIGN PHASES OF THE PROJECT.
 - A SITE BERM WILL BE CONSTRUCTED IN THIS AREA THAT WILL BE AT LEAST 6' TALL THAT WILL PROVIDE SCREENING OF THE TRANSFER STATION

FILE: P:\2018\183-660\CADD\DWG\17_AESTMETIC_ENHANCEMENT_PLAN.DWG PLOTTED ON: 03/25/21 4:13:53 PM
 PLOTTED BY: SHEPHERD, NICK

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AESTMETIC ENHANCEMENT PLAN

DATE: 02/13/2020 DRAWN BY: Ray Farmer
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