



North Central Texas Council of Governments

SUMMARY

Resource Conservation Council Facility Conformance Subcommittee

Wednesday, February 3, 2021

1:30 p.m. – 2:30 p.m., via Video Conference Call

[Link to Join Microsoft Teams Meeting](#)

Or call-in: 1-903-508-4574

Phone Conference ID: 257 862 814#

Chair: Jeff Mayfield, North Texas Municipal Water District
Vice-Chair: Patricia Redfearn, Ph.D., City of Grand Prairie

1. Welcome and Introductions.

PRESENTATION

2. Andrea Zamora, Environmental Consultant, Source Environmental Sciences, Inc. will brief the Subcommittee on the new, Type V registration application for All Paws Go to Heaven, LLC, an existing facility in Collin County. George O. Chandlee, Ph.D., P.G., Senior Environmental Consultant, and Elizabeth Andaverde, Senior Environmental Consultant and Wastewater Project Manager, both from Source Environmental Sciences, Inc., will also be in attendance to assist with questions posed by the Subcommittee.

Mr. George Chandlee, PhD., P.G., noted that the facility name is actually 4283929 Delaware, LLC, and it is doing business as All Paws Go to Heaven, LLC. The application is the result of an enforcement matter with TCEQ, which can be found in the public docket [here](#). The facility is located in the general business district of the town of New Hope in Collin County.

The facility is located on a one-acre site and has two buildings. The entire incineration process takes place indoors and so the applicant expects no impacts on surrounding land. Members of the general public can drop-off deceased pets 24-hours a day at the facility. The facility holds the pets in cold storage for up to 90 days, but the average length of time that a deceased pet is stored on the facility is 5 days. One condition of the agreed order states that the facility is to submit an administratively complete MSW permit application for the site.

ACTION ITEM

3. The Subcommittee will discuss the application for All Paws Go to Heaven, LLC and vote whether to recommend to the Resource Conservation Council (RCC) that the application conforms to the North Central Texas Regional Solid Waste Management Plan.

The Subcommittee had questions for the applicant, which can be found below.

- 1) Where is the facility located, in McKinney or New Hope?



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The facility is in the general business district of the town of New Hope but uses McKinney as its mailing address.

2) You say you accept deceased pets 24-hours a day. Is the facility manned 24-hours a day?

No, it is not manned 24-hours a day, but it is monitored with security cameras. Members of the general public cannot bring waste to the facility 24-hours a day. Instead, the public can contact the site operators to make arrangements to pick-up the pets 24-hours a day. This will need to be clarified in the presentation and application text.

3) What odor mitigation is in place from the past violation that triggered an enforcement order?

There is new management in place now. Deceased pets are no longer allowed to be stored outside. They have larger freezers on site and if those freezers fill, then the facility can contact partner facilities to store the extra volume of waste.

4) Have you evaluated the traffic projections at the facility and compared them to the roadway capacity?

No, they have not.

5) How frequently do the incinerators operate at the facility?

Five days a week for 10-12 hours a day.

6) The application states that odor measures will be implemented as necessary, but there is no mention of what those measures are. What are the odor measures?

There are no odors with incineration, just odors from having to store too many pets on site. So, as stated earlier, the facility has large freezers and the ability to transfer pets to sister facilities for storage.

7) The submittal states that there is regularly cleaning of floors and walls at the facility, but then in another section the text states that there is no wastewater. Is that a conflict?

It is not considered wastewater because there is no discharge to a receiving water body.

8) Then, does the site have a septic field?

The applicant does not know.

9) Section 4.5.9.3 refers to prohibitions on incoming waste streams, but in the presentation, you noted that members of the general public can drop-off pets. This is contradictory.

This will need to be clarified in the text.



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- 10) In section 4.5.11.1, the operating hours conflict with the air permit. This should be clarified.
- 11) If odors caused the violation order, it is recommended that you have an odor mitigation plan.
- 12) Is this a permit application or a registration application? The submittal indicates that it is a registration in one place and a permit in another.

This is a permit application. The place in the submittal where it is labeled a registration is an error. The application will be withdrawn later today, and the applicant intends to resubmit as a permit application.

DISCUSSION

4. Next Steps – The RCC will vote on the Subcommittee’s conformance recommendation for All Paws Go to Heaven, LLC facility at its next meeting on February 18, 2021. After this meeting, a letter stating the RCC’s final conformance determination will be submitted to the TCEQ, and a copy will also be sent to the applicant.

The Subcommittee did not vote on a conformance recommendation for the facility because the applicant is withdrawing the registration application and submitting a permit application instead, as was outlined in the enforcement matter. NCTCOG will be contacted by the applicant when the permit application is ready for review.

5. Documentation of Process for Evaluating Whether a Proposed MSW Facility Application Conforms with the Regional Plan. Elena Berg, NCTCOG.

The Subcommittee will review this item in more depth after the current legislative session closes because there may be some requirements resulting from the session that the subcommittee would want to include in the documentation.

6. Adjournment

If you have any questions regarding the meeting or agenda items, please contact Elena Berg at (817) 608-2363 or eberg@nctcog.org. Thank you!

If you plan to attend this public meeting and you have a disability that requires special arrangements at the meeting, please contact Barbara Bradford by phone at (817) 695-9231 or by email at bbradford@nctcog.org 72 hours in advance of the meeting. Reasonable accommodations will be made to assist your needs.



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Virtual Meeting Attendance
Facility Conformance Subcommittee
February 3, 2021

Guests

Elizabeth Andaverde, Source Environmental Sciences, Inc.
George O. Chandlee, Ph.D., P.G., Source Environmental Sciences, Inc.
Michael Dunn, 4283929 Delaware, LLC
Casey Springer, 4283929 Delaware, LLC
Andrea Zamora, Source Environmental Sciences, Inc.

Subcommittee Members

Jeff Mayfield, Chair of Subcommittee, North Texas Municipal Water District
Patricia Redfearn, Ph.D., Vice-Chair of Subcommittee, City of Grand Prairie
Ami Reeder, City of Denton
Risa Weinberger, Risa Weinberger & Associates, Inc.

NCTCOG Staff

Elena Berg
Cassidy Campbell