



# Texas Commission on Environmental Quality Waste Permits Division Correspondence Cover Sheet

Date: March 25, 2024

Facility Name: Doty Sand Pit Venture Landfill

Permit or Registration No.: 1247

Nature of Correspondence:

Initial/New

Response/Revision to TCEQ Tracking No.:  
29453426 (from subject line of TCEQ letter  
regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

**Table 1 - Municipal Solid Waste Correspondence**

Applications	Reports and Notifications
<input type="checkbox"/> New Notice of Intent	<input type="checkbox"/> Alternative Daily Cover Report
<input type="checkbox"/> Notice of Intent Revision	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Compost Report
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Groundwater Background Evaluation
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure	<input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Other: <b>Response to Comments of Mar 18, 2024</b>	

**Table 2 - Industrial & Hazardous Waste Correspondence**

Applications	Reports and Responses
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> CCR Registration	<input type="checkbox"/> Extension Request
<input type="checkbox"/> CCR Registration Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> CCR Registration Minor Amendment	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Waste Minimization Report
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> 335.6 Notification	
<input type="checkbox"/> Other:	



SKA Project 6022-0001  
**Via Federal Express**

March 25, 2024

Municipal Solids Waste Permits Section, MC-124  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

**RE: *Application for Development Permit for Proposed Enclosed Structure  
Over Closed Municipal Solid Waste Landfill  
Doty Sand Pit Venture Landfill  
12000 Bissonnet Street, Houston, Harris County, Texas 77099  
TCEQ MSW Permit No. 1247; TCEQ Tracking No. 29453426***

Dear Mr. Pedersen:

SKA Consulting, L.P (SKA) on behalf of Impact Residential Development, LLC (Applicant) has prepared the following responses to the Texas Commission on Environmental Quality (TCEQ) comments regarding the above referenced application and transmitted by email on March 18, 2024. The TCEQ comments are listed below in italics followed by the respective response.

*For application form TCEQ-20785, please revise:*

1. *Item 16, the RN, to be 101288322*

The RN has been added to Item 16 on page 5 of form TCEQ-20785. The revised form page (unmarked) is enclosed. The RN on Item 16 was previously blank so there is no redline/strikeout copy.

2. *Item 17, the applicant name, to be Impact Residential Development, LLC.*

The Applicant name in Item 17 of page 6 of TCEQ-20785 has been changed to Impact Residential Development, LLC. The revised form page (unmarked) and a redline-strikeout (marked) version are enclosed.

*For core data form TCEQ-10400, please revise:*

3. *Item 3, the RN, to be 101288322.*

The RN has been added to Item 3 on the Core Data form. The revised Core Data form (unmarked) is enclosed. The RN on Item 3 was previously blank so there is no redline/strikeout copy.

4. *Item 15, the mailing address, to read:  
IMPACT RESIDENTIAL DEVELOPMENT, LLC  
400 GALLERIA PKWY SE STE 1450  
ATLANTA GA 30339-5989*

The mailing address has been changed to be in all capital letters. The revised Core Data form (unmarked) is enclosed.

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5. *Item 22, the regulated entity, to be "Kirkwood Crossing Apartments."*

Kirkwood Crossing Apartments has been added to the Core Data form Item 22. Item 22 was previously blank so there is no redline/strikeout copy. The revised Core Data form (unmarked) is enclosed.

6 *Item 46, the date of the signature.*

The Core Data form Item 46 signature is now dated. The revised Core Data form (unmarked) is enclosed. Item 46 was previously blank so there is no redline/strikeout copy.

*For Figure 3A, Adjacent Landowner Map, please:*

7. *Include either the mineral interest owners and their addresses for the Doty Sand Pit Venture Landfill property or a note that the mineral interest owners were not listed in the real property appraisal records for Harris County.*

No mineral interest owners for the subject property were found in the real property appraisal records of Harris County, Texas. A revised Figure 3A is attached.

A recently signed professional engineer certification and applicant certification and property owner authorization (pages 12 and 13 of Form TCEQ-20785, respectively) are included.

On behalf of Impact Residential Development, LLC, please contact me at [mike.schultz@skaconsulting.com](mailto:mike.schultz@skaconsulting.com) or (713) 266-6056 if you have any questions.

Sincerely,

**SKA CONSULTING, L.P.**



Mike Schultz, P.E.  
Executive Vice President, Partner

Attachments: Form TCEQ-20785, Item 16, Page 5 – unmarked copy  
Form TCEQ-20785, Item 17 – unmarked and marked copies  
Core Data Form, Item 3 – unmarked copy  
Core Data Form, Item 15 – unmarked copy  
Core Data Form, Item 22 - unmarked copy  
Core Data Form, Item 46 - unmarked copy  
Figure 3A Adjacent Landowner Map (revised)

cc: Ms. Jessica Mullins, Impact Residential Development, LLC, w/attachments (electronic)  
Mr. Mark Lester, Northwest Metro Holding, CS 34, LLC, w/attachments (electronic)  
Ms. Elita Castleberry, Harris County Pollution Control Services Department,  
w/attachments

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## 15. Permits and Construction Approvals

Mark the following tables to indicate status of other permits or approvals.

### Permits and Construction Approvals

Permit or Approval	Received	Pending	Not Applicable
Zoning Approval			
Preliminary Subdivision Plan			
Final Plat			
Fire Inspector's Approval			
Building Inspector's Approval on Plans			
Water Service Tap			
Wastewater Service Tap			
On-site Wastewater Disposal System Approval			

### Other Environmental Permits

Other Environmental Permits (list)	Received	Pending

## 16. General Project Information

Facility Name: \_\_\_\_\_

SubT Development Permit Number (if available): \_\_\_\_\_

Regulated Entity Reference Number (if issued): **RN** \_\_\_\_\_

Street or Physical Address: \_\_\_\_\_

City: \_\_\_\_\_ County: \_\_\_\_\_ State: TX Zip Code: \_\_\_\_\_

Phone Number: \_\_\_\_\_

*If Regulated Entity Reference Number has not been issued for the facility, complete a Core Data Form (TCEQ-10400) and submit it with this application.*

## 17. Contact Information

### Applicant (Lessee/Project Owner)

Name: \_\_\_\_\_

Customer Reference Number (if issued): **CN** \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ County: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

*If Customer Reference Number has not been issued, complete a Core Data Form (TCEQ-10400) and submit it with this application. List the Applicant as the Customer.*

### Property Owner

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ County: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

*If the Property Owner is the same as Applicant, indicate "Same as "Applicant".*

### Consultant (if applicable)

Firm Name: \_\_\_\_\_

Texas Board of Professional Engineers and Land Surveyors Firm Number: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ County: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Consultant Name: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

### Engineer Who Performed Soil Tests

Firm Name: \_\_\_\_\_

Texas Board of Professional Engineers and Land Surveyors Firm Number: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ County: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Engineer Name: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

# Professional Engineer's Certification of No Potential Threat to Public Health or the Environment

The applicant's engineer for this project shall complete one of the following certifications:

"I, \_\_\_\_\_, Texas PE Number \_\_\_\_\_, certify that the proposed development is necessary to reduce a potential threat to public health or the environment. Further, I certify that the proposed development will not damage the integrity or function of any component of the Closed Municipal Solid Waste Landfill Unit, including, but not limited to, the final cover, containment systems, monitoring system, or liners. This certification includes all documentation of all studies and data on which I relied in making these determinations."

Engineer's seal, with signature and date:

Engineering Firm Name: \_\_\_\_\_

Texas Board of Professional Engineers and Land Surveyors Firm Number: \_\_\_\_\_

Or:

" I, **Mike Schultz, P.E.**, Texas PE Number **68765**, certify that the proposed development will not increase or create a potential threat to public health or the environment. Further, I certify that the proposed development will not damage the integrity or function of any component of the Closed Municipal Solid Waste Landfill Unit, including, but not limited to, the final cover, containment systems, monitoring system, or liners. This certification includes all documentation of all studies and data on which I relied in making these determinations."

Engineer's seal, with signature and date:



Engineering Firm Name: **SKA Consulting, L.P.**

Texas Board of Professional Engineers and Land Surveyors Firm Number: **5009**

# Signature Page

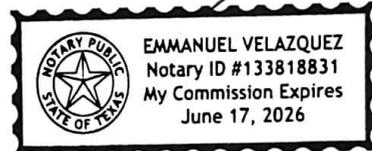
## Applicant Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Jessica Mullins Title: Vice President  
Signature: [Signature] Date: 9/11/2023  
Email Address: jmullins@impactresidential.com

SUBSCRIBED AND SWORN to before me by the said Jessica Mullins  
On this 11<sup>th</sup> day of September, 2023  
My commission expires on the 17<sup>th</sup> day of June, 2026  
Notary's Name: Emmanuel Velazquez [Signature]

Notary Public in and for  
Montgomery County, Texas



## Property Owner Authorization

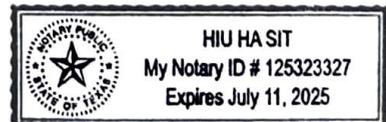
To be completed by the property owner if the property owner is not the applicant.

I John Quinlan, President of Bissonnet 136, LLC, the owner of the property identified by the address 12000 Bissonnet St, Houston, TX 77099, hereby authorize the applicant to proceed with the project described in this application, and to apply for any necessary authorizations in order to conduct this project. I understand that, as property owner, I am responsible for maintaining the integrity of the final cover over the closed MSW landfill.

Property Owner Name: Bissonnet 136, LLC  
Signature: [Signature] President of Bissonnet 136, LLC Date: 9/6/2023  
Email Address: john.quinlan@gmail.com

SUBSCRIBED AND SWORN to before me by the said John Quinlan  
On this 6 day of September 2023  
My commission expires on the \_\_\_ day of \_\_\_\_\_, \_\_\_\_  
Notary's Name: Huifa SA

Notary Public in and for  
[Signature] County, Texas





TCEQ Use Only

# TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

## SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input checked="" type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input type="checkbox"/> Other	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN		RN 101288322

## SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)		
<input checked="" type="checkbox"/> New Customer		<input type="checkbox"/> Update to Customer Information		<input type="checkbox"/> Change in Regulated Entity Ownership
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)				
<b>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</b>				
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)			If new Customer, enter previous Customer below:	
Impact Residential Development, LLC				
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)	
11. Type of Customer:		<input checked="" type="checkbox"/> Corporation		
		<input type="checkbox"/> Individual		
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Other		Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited		
		<input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Other:		
12. Number of Employees			13. Independently Owned and Operated?	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following				
<input type="checkbox"/> Owner		<input type="checkbox"/> Operator		<input checked="" type="checkbox"/> Owner & Operator
<input type="checkbox"/> Occupational Licensee		<input type="checkbox"/> Responsible Party		<input checked="" type="checkbox"/> Other: MSW Subchapter T Applicant
15. Mailing Address:	IMPACT RESIDENTIAL DEVELOPMENT, LLC			
	400 GALLERIA PKWY SE STE 1450			
	City	ATLANTA	State	GA
	ZIP	30339	ZIP + 4	5989
16. Country Mailing Information (if outside USA)			17. E-Mail Address (if applicable)	
			jmullins@impactdevelopmentpartnersllc.com	
18. Telephone Number		19. Extension or Code		20. Fax Number (if applicable)
( 713 ) 344-7055				( ) -

## SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected below this form should be accompanied by a permit application)	
<input checked="" type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input type="checkbox"/> Update to Regulated Entity Information	
<b>The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC).</b>	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
Kirkwood Crossing Apartments	

23. Street Address of the Regulated Entity: <i>(No PO Boxes)</i>	12000 Bissonnet Street						
	City	Houston	State	TX	ZIP	77099	ZIP + 4
24. County	Harris						

Enter Physical Location Description if no street address is provided.

25. Description to Physical Location:	+/- 12 acres in the central portion of Doty Sand Pit Venture Landfill.						
26. Nearest City	Houston				State	TX	Nearest ZIP Code
27. Latitude (N) In Decimal:	29.6796070			28. Longitude (W) In Decimal:	-95.5915470		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
29	40	46.59	95	35	29.57		
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)	31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)			
33. What is the Primary Business of this entity? <i>(Do not repeat the SIC or NAICS description.)</i>							
Closed Type IV Landfill							
34. Mailing Address:	400 Galleria Parkway, Suite 1450						
	City	Atlanta	State	GA	ZIP	30339	ZIP + 4
35. E-Mail Address:							
36. Telephone Number		37. Extension or Code			38. Fax Number <i>(if applicable)</i>		
( 713 ) 344-7055					( ) -		

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input type="checkbox"/> Industrial Hazardous Waste
<input checked="" type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

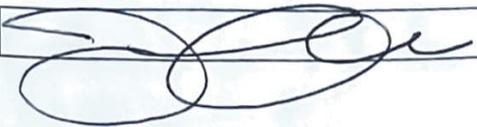
### SECTION IV: Preparer Information

40. Name:	Mike Schultz, P.E.	41. Title:	Principal Engineer
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
( 713 ) 266-6056		( 713 ) 266-0996	mike.schultz@skaconsulting.com

### SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Impact Residential Development, LLC	Job Title:	President
Name <i>(In Print)</i> :	Jessica Mullins	Phone:	( 713 ) 344- 7055

Signature:		Date:	8/20/2024
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## 17. Contact Information

### Applicant (Lessee/Project Owner)

Name: Jessica Mullins

Customer Reference Number (if issued): **CN** \_\_\_\_\_

Mailing Address: 400 Galleria Parkway, Suite 1450

City: Atlanta County: Cobb State: GA Zip Code: 30339

Phone Number: 713-344-7055

Email Address: jmullins@impactresidential.com

*If Customer Reference Number has not been issued, complete a Core Data Form (TCEQ-10400) and submit it with this application. List the Applicant as the Customer.*

### Property Owner

Name: Bissonnet 136, LLC

Mailing Address: 20 Park Road, Suite G

City: Burlingame County: San Mateo State: CA Zip Code: 94010

Phone Number: (650) 638-0900

Email Address: mlester@landcorealestate.com

*If the Property Owner is the same as Applicant, indicate "Same as "Applicant".*

### Consultant (if applicable)

Firm Name: SKA Consulting, L.P.

Texas Board of Professional Engineers and Land Surveyors Firm Number: 5009

Mailing Address: 1888 Stebbins Drive, Suite 100

City: Houston County: Harris State: TX Zip Code: 77043

Consultant Name: Mike Schultz, P.E.

Phone Number: 713-266-6056

Email Address: mike.schultz@skaconsulting.com

### Engineer Who Performed Soil Tests

Firm Name: Goodheart & Associates, PLLC

Texas Board of Professional Engineers and Land Surveyors Firm Number: 21548

Mailing Address: 2021 Midwest Road, Suite 200

City: Oak Brook County: DuPage State: IL Zip Code: 60523

Engineer Name: Gary Goodheart, P.E.

Phone Number: 630-816-5405

Email Address: Gary@Goodheartllc.com