

Altair Hazardous Waste Landfill in Colorado County Should be Closely Reviewed

***By Phil Wilson
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As stewards of the roughly 600 miles of the Colorado River in Texas from downstream of the O. H. Ivie Reservoir in Coleman County to Matagorda Bay, we at the Lower Colorado River Authority take the protection of the environmental integrity of the river basin very seriously. The river and our system of reservoirs provide drinking water for over 1 million Texans, as well as water for agriculture, industry and power production. It is no exaggeration to say the river is the lifeblood for the counties through which it flows.

Altair Disposal Services, LLC (Altair) has applied to the Texas Commission on Environmental Quality for a hazardous waste permit to authorize the construction and operation of a landfill for the disposal of hazardous waste and industrial solid waste. Altair has proposed locating the facility adjacent to Altair's existing municipal landfill near Altair, Texas, in Colorado County.

The TCEQ executive director has completed a technical review of Altair's application and prepared a draft permit. The draft permit, if approved by the TCEQ commissioners, would establish the conditions under which the facility must operate.

At LCRA, we recognize the need for these types of disposal facilities in Texas. Texas is an economically vibrant state, and we must make provision for the disposal of waste resulting from industrial activity. However, we have concerns about the potential environmental degradation of the river basin resulting from the siting of a hazardous and industrial waste facility in Colorado County as proposed in the draft permit. Indeed, granting the permit in its current draft form could result in the degradation of groundwater and surface water resources in Colorado, Wharton and Matagorda counties, as well as pose a risk to the ecological balance of Matagorda Bay.

The proposed location of the hazardous waste landfill is within the Chicot Aquifer, which is part of the larger Gulf Coast Aquifer. The Chicot Aquifer is used as a potential source of water for drinking water, livestock and irrigation purposes. There is a real potential for a possible hydraulic connection between the shallow aquifer at the proposed landfill site and the Colorado River. This possibility demands further investigation by TCEQ.

Altair's proposed groundwater monitoring program does not appear to be adequate to detect a release of hazardous substances from the landfill. We urge TCEQ to re-evaluate the proposed monitoring well system to ensure groundwater flow conditions are adequately monitored.

TCEQ currently requires a stormwater management plan and permitting for hazardous waste treatment, storage and disposal facilities in this area of Texas. However, the stormwater management design criteria in the current draft permit is inadequate for containing excessive storm and rain events, such as that experienced during Hurricane Harvey in August and September of 2017, when the region experienced rainfall in excess of 50 inches.

History has taught us that Mother Nature is capable of imposing havoc in the Colorado River basin in the form of massive rain events and severe flooding. Even as we look back most

recently to Hurricane Harvey in 2017, we also remember well the rains and flooding that occurred downstream of our dams in April and May of 2016. One thing we know for certain: The rains and flooding will come again. Given this stark reality, LCRA questions the prudence of locating a hazardous waste and industrial solid waste facility as proposed in the draft permit in the potential path of a future flood event like that experienced in both 2016 and again in even more dramatic fashion in 2017.

For all of these reasons, LCRA has requested TCEQ hold a contested case public hearing on the Altair permit application and looks forward to presenting our concerns when such a hearing is scheduled.

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