



January 6, 2010
Project No. 09-12-31

Mr. Arthur Denny
MC 124
Municipal Solid Waste Permits Section
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

Re: Response to a TCEQ Notice of Deficiency Letter Dated December 7, 2009, Camelot Landfill, MSW Permit No. 1312A, Denton County, Texas; WWC 12782787; RN101479038/CN601253628

Dear Mr. Denny:

This letter is written to provide a response to the comments in a letter dated December 7, 2009, from the Texas Commission on Environmental Quality (TCEQ). The letter requested that the TCEQ comments be addressed within 30 days (January 6, 2010). The TCEQ's comment/questions are provided below in italics with our response immediately following.

Comment 1: *Section 8, Background Samples, references the analytical methods for measurement that were listed in Table 2. Table 2 has been removed and is no longer a part of the GWSAP. Please remove this reference and specify that "all of the 47 volatile organic compounds and 15 metals of Appendix I to Part 258 – Constituents for Detection Monitoring will be included as the parameters to be tested."*

Response: Table 2 was replaced with a new Table 2, *List of Analytical Parameters*, which consists of all 47 volatile organic compounds and 15 metals of Appendix I to Part 258. However, the requested language has been added to Section 8 of the GWSAP.

Comment 2: *Please review the complete GWSAP for any other erroneous references to Table 2 and replace the Table 2 language with the language requested above.*

Response: As previously stated, Table 2 was replaced with new Table 2 *List of Analytical Parameters*. All references to Table 2 in the GWSAP correspond to the new Table 2.

Comment 3: *Section 9, Detection Monitoring, please add the following language to the last sentence in paragraph two "with executive director approval."*

Response: The requested language has been added to Section 9.

Comment 4: *Section 9.2, Statistically Significant Constituents and Verification Resampling, contains language for the allowance of statistical analysis of volatile organic compound (VOC) data. Please understand that it is the MSW Permit Section's practice not to allow the statistical analysis of VOCs as they are deemed man-made chemicals which are not expected to be found in clean groundwaters. Please remove all language from the GWSAP that allow for such an action.*

Response: The language for the allowance of statistical analysis of volatile organic compound (VOC) data has been removed from the GWSAP.

Comment 5: *Section 10, Quality Assurance and Quality Control (QA/QC), does not include for the production and record keeping of Field Notes. Please include language describing how the Field Notes will be produced, collected, stored and made available for future Texas Commission on Environmental Quality request and or inspections.*

Response: The following language has been added to Section 10.1: "Collected field QA/QC samples will be noted on Field Data Sheets and Chain-of-Custody (COC). All field notes will be completely and accurately documented. All field information will be entered on a standard Field Data Sheet (see Appendix A). All entries should be legible and made in indelible ink. Entry errors will be crossed out with a single line, dated, and initialed by the person making the corrections. The Field Data Sheets and COC will be produced, collected, stored and made available for future TCEQ requests and or inspections."

Comment 6: *Please also discuss how any deviations in the field from the normal sample collection and preservation procedures, will be noted in the field notes and will be included in all monitoring reports.*

Response: The following language has been added to Section 6.9: "Deviations in the field from the normal sample collection and preservation procedures (e.g. well sampling order, well purging/sampling procedures, etc.) will be noted in the field notes and will be included in all monitoring reports."

Comment 7: *We request that a new section be included that includes clearly elucidates what and when the new groundwater monitoring information will be submitted to the MSW Permits Section. Please include the time frames for each of your submittals in this new section.*

Response: Sections 9.1 and 9.2 contains specific submittal time frames for groundwater monitoring information submitted to the MSW Permits Section.

Comment 8: *Section 10.2, Laboratory QA/QC, contains the following language "analytical data analysis program." Please replace afore mentioned*

language with "Quality Assurance / Quality Control Program and analytical method requirements."

Response: The requested change to Section 10.2 has been made and the revised pages are attached.


We trust this information meets your needs, please call Mr. Mark Meadows at (972) 434-2015 or us at (817) 337-0112 if you have any questions.

Sincerely,

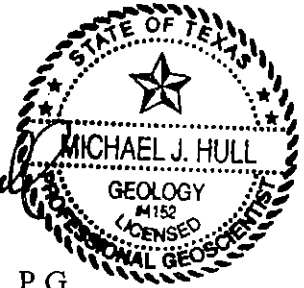
THE CAREL CORPORATION



Steven J. Wimmer
Remedial and Environmental Services Manager



Michael J. Hull, P.G.
Geologist



Att: TCEQ Part 1 Application Page 1 and Signature Page
GWSAP – Underlined/Strikeout Replacement Pages
GWSAP – Clean Replacement Pages

cc: TCEQ Region 4 Office
Mark Meadows – Camelot Landfill TX, LP
Mark Allendorf – Republic Services, Inc. (e-copy)
Larry Bressman – Camelot Landfill
Shane Davis – City of Farmer's Branch

TCEQ Part 1 Application Page 1 and Signature Page



Texas Commission on Environmental Quality

Permit or Registration Application for Municipal Solid Waste Facility

Part I

A. General Information

Facility Name:	Camelot Landfill			
Physical or Street Address (if available):	580 Huffines Blvd.			
(City) (County)(State)(Zip Code):	Lewisville	Denton	TX	75056
(Area Code) Telephone Number:	972-492-3888			
Charter Number:				

If the application is submitted on behalf of a corporation, provide the Charter Number as recorded with the Office of the Secretary of State for Texas.

Operator Name ¹ :	Camelot Landfill TX, LP			
Mailing Address:	580 Huffines Blvd.			
(City) (County)(State)(Zip Code):	Lewisville	Denton	TX	75056
(Area Code) Telephone Number:	972-492-3888			
(Area Code) FAX Number:	972-492-4943			
Charter Number:				

If the permittee is the same as the operator, type "Same as Operator".

Permittee Name:	City of Farmers Branch			
Physical or Street Address (if available):	13000 Wm. Dodson Pkwy.			
(City) (County)(State)(Zip Code):	Frmrs Branch	Denton	TX	75234
(Area Code) Telephone Number:	972-919-2597			
Charter Number:				

If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

Agent Name:	CT Corporation System			
Mailing Address:	350 N. St. Paul Street			
(City) (County)(State)(Zip Code):	Dallas	Dallas	TX	75201
(Area Code) Telephone Number:	214-979-1172			
(Area Code) FAX Number:	214-754-0921			

Application Type:

<input type="checkbox"/> Permit	<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Minor Amendment	
<input type="checkbox"/> Registration	<input checked="" type="checkbox"/> Modification	<input type="checkbox"/> Temporary Authorization	
	<input type="checkbox"/> w/Public Notice		
	<input checked="" type="checkbox"/> w/out Public Notice	<input checked="" type="checkbox"/> Notice of Deficiency Response	

¹ The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on this application [Section 361.087 Texas Health and Safety Code].

Signature Page

I, Mark Pavageaux, Director, Public Works Dept.
(Operator) (Title)

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.

Signature: Mark Pavageaux Date: 12-31-09

TO BE COMPLETED BY THE OPERATOR IF THE APPLICATION IS SIGNED BY AN AUTHORIZED REPRESENTATIVE FOR THE OPERATOR

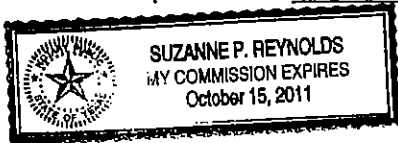
I, _____, hereby designate _____
(Print or Type Operator Name) (Print or Type Representative Name)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

SUBSCRIBED AND SWORN to before me by the said Mark Pavageaux
On this 31st day of December, 2009
My commission expires on the 15th day of October, 2011



Suzanne P. Reynolds
Notary Public in and for
Dallas County, Texas

(Note: Application Must Bear Signature & Seal of Notary Public)

GWSAP – Underlined/Strikeout Replacement Pages

**CAMELOT LANDFILL
TCEQ PERMIT NO. 1312-A
DENTON COUNTY, TEXAS**

**ATTACHMENT 11
GROUNDWATER SAMPLING AND
ANLYSIS PLAN (GWSAP)**

Prepared for:

Camelot Landfill TX, L.P.

and

The City of Farmers Branch, Texas

February 2000

Revised December 2006

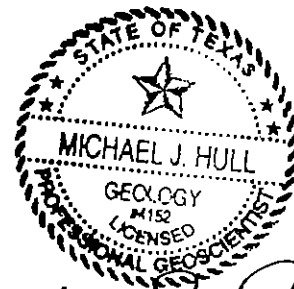
~~Revised August 2009~~

Revised January 2010

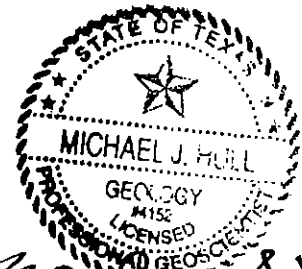
Prepared by:



136 Pecan Street
Keller, Texas 76248
(817) 337-0112



Michael J. Hull
12/30/09



CONTENTS

LIST OF TABLES AND ILLUSTRATIONS	viii
1 INTRODUCTION	1
2 SAFETY	2
3 WELL INTEGRITY INSPECTION	3
4 WATER LEVEL MEASUREMENTS	4
5 WELL PURGING	5
5.1 Equipment Instructions	6
6 SAMPLE COLLECTION, PRESERVATION, AND SHIPMENT	7
6.1 Timing and Order of Sampling	7
6.2 Sample Collection	7
6.3 Field Measurements	7
6.4 Decontamination	8
6.5 Sample Containers	8
6.6 Sample Preservation and Holding Times	8
6.7 Sample Storage and Transport	9
6.8 Chain-of-Custody Documentation	9
6.9 Documentation of Sampling	9
6.10 Sample Filtration	9
7 ANALYTICAL PARAMETERS	10
8 BACKGROUND SAMPLES	12
9 DETECTION MONITORING	13
9.1 Ground Water Analysis Result Submittals	13
9.2 Volatile Organic Compounds	14
9.3 Statistically Significant Metals	14
9.4 Verification Resampling	15

10	QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC)	16
10.1	Field QA/QC	16
10.2	Laboratory QA/QC	17
11	STATISTICAL EVALUATION OF GROUNDWATER ANALYTICAL DATA 21	
11.1	Independent Samples	21
12	REFERENCES	23
1	INTRODUCTION	1
2	SAFETY	2
3	WELL INTEGRITY INSPECTION	3
4	WATER LEVEL MEASUREMENTS	4
5	WELL PURGING	5
5.1	Equipment Instructions	6
6	SAMPLE COLLECTION, PRESERVATION, AND SHIPMENT	7
6.1	Timing and Order of Sampling	7
6.2	Sample Collection	7
6.3	Field Measurements	7
6.4	Decontamination	8
6.5	Sample Containers	8
6.6	Sample Preservation and Holding Times	8
6.7	Sample Storage and Transport	9
6.8	Chain of Custody Documentation	9
6.9	Documentation of Sampling	9
6.10	Sample Filtration	9
7	ANALYTICAL PARAMETERS	10
8	BACKGROUND SAMPLES	12
9	DETECTION MONITORING	13
9.1	Ground Water Analysis Result Submittals	13

9.2	Statistically Significant Constituents and Verification Resampling	14
10	QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC)	1615
10.1	Field QA/QC	1615
10.2	Laboratory QA/QC	1716
11	STATISTICAL EVALUATION OF GROUNDWATER ANALYTICAL DATA	2120
11.1	Independent Samples	2120
12	REFERENCES	2322
APPENDIX A – Example Field Data Sheet		
APPENDIX B – Sample Chain of Custody		
APPENDIX C – Statistical Analysis Plan		
APPENDIX D – Laboratory Checklist		

TABLES AND ILLUSTRATIONS

Tables

- 1 Recommended Sampling, Preservative, and Storage Procedures for Ground-Water Monitoring
- 2 ~~List of Analytical Parameters Proposed Constituents and Analytical Methods, Background and Detection Monitoring~~

5 WELL PURGING

Prior to purging, the groundwater level in each well will be measured as described in Section 4. Low-flow purging will be employed using dedicated bladder pumps. A low-flow purging demonstration was performed by the Carel Corporation (Carel Corp. 1999) and subsequently approved by the TCEQ in a letter dated August 4, 1999. Well purging will be conducted at a rate of approximately 100 milliliters per minute until two pump and tubing volumes have been removed and stabilization of field parameters is achieved. Field parameters include temperature, specific conductivity, pH, and turbidity. Stabilization is defined as three consecutive measurements of specific conductance, temperature, and turbidity within 10 percent and three consecutive pH measurements within 0.2 standard units. Measurements will be taken every three to five minutes and recorded on the field data sheet. Water level measurement will also be taken every three to five minutes to ensure minimal drawdown of the water level occurs during low-flow purging.

In the event of a non-operative dedicated pump, the pump and tubing apparatus will be removed for repairs or replacement and the well will be purged by means of either a disposable bailer or a portable pump. Purging will be performed by removing three well-casing volumes of water from the well and temperature, specific conductance, pH, and ~~turbidity~~ turbidity have stabilized. Purging will be deemed complete if the well goes dry before three well-casing volumes of water have been removed. Field parameters will be measured periodically during purging.

In the event a well is determined to be affected by landfill gas, purging may be performed by removing three well-casing volumes of water from the well and temperature, specific conductance, pH, and ~~turbidity~~ turbidity have stabilized. Purging will be deemed complete if the well goes dry before three well-casing volumes of water have been removed. Field parameters will be measured periodically during purging.

The temperature, specific conductivity, pH, and turbidity measuring device(s) will be calibrated daily prior to use, per the manufacturer's instructions.

6 SAMPLE COLLECTION, PRESERVATION, AND SHIPMENT

6.1 Timing and Order of Sampling

Sampling shall occur as soon as practicable after purging. The monitor wells will be sampled from background to point of compliance water wells, unless target constituents are detected. If target constituents are detected, then the wells will be sampled from least to greatest impacted well.

Sampling should take place as soon as purging is complete in moderate to high yield wells. For wells purged dry, sampling generally will take place within 24 hours once the well has sufficient recharge, typically the following day. The time interval between the completion of well purge and sample collection normally should not exceed twenty-four hours. However, longer times not exceeding six (6) or seven (7) days may be allowed for slow recharging wells with prior approval from the TCEQ.

6.2 Sample Collection

Samples will be collected by means of a dedicated bladder pump discharging directly into each of the required containers. In the event of a non-operative dedicated pump the well will be sampled by means of either a disposable bailer or a portable pump.

6.3 Field Measurements

Temperature, specific conductance, pH, and ~~turbidity~~turbidity will be measured in the field. The temperature, specific conductivity, pH, and turbidity device/s will be calibrated daily prior to use, per the manufacturer's instructions. Temperature will be measured, immediately followed by pH, then conductivity, then ~~turbidity~~turbidity. Field measurements will be recorded on the field data sheet. The water used for these field measurements will be placed with the purge water.

6.7 Sample Storage and Transport

Filled sample bottles will be placed immediately into an ice chest, and packed with sufficient ice to keep them at 4°C. Warm samples will cause the ice to melt rapidly, especially if a large number of samples are placed in an ice chest, therefore, adequate ice will be kept in the ice chest to keep samples cold in the field until transported to the laboratory. When possible the containers holding the samples will be delivered to the laboratory by the samplers, the operator, or their representative. If not possible they will be shipped via a shipping service.

6.8 Chain-of-Custody Documentation

Once the samples have been properly labeled and sealed, they will be entered into a Chain-of-Custody (COC), signed and dated by the sampling personnel. The COC will accompany the samples at all times and at every step from field to laboratory and must be signed by all parties handling the samples. A typical Chain-of-Custody is presented in Appendix B.

6.9 Documentation of Sampling

Information relating to the sampling event will be recorded on a field data sheet. All entries will be made in indelible ink. Entry errors will be crossed out with a single line and initialed by the person making the corrections. Deviations in the field from the normal sample collection and preservation procedures (e.g. well sampling order, well purging/sampling procedures, etc.) will be noted in the field notes and will be included in all monitoring reports.

6.10 Sample Filtration

In accordance with 30 TAC 330.405 9(c), groundwater samples will not be field-filtered prior to laboratory analysis.

7 ANALYTICAL PARAMETERS

The detection monitoring constituents at the facility will be as specified in 30 TAC 330.419 and 40 Code of Federal Regulations (CFR) 258 Appendix I (see Table 42 of this GWSAP). However, contrary to the previously approved GWSAP, the metals will be analyzed as total rather than dissolved. The practical quantitation limit (PQL) for each constituent will be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions that are available to the facility, per 30 TAC 330.405(f)(5).

The practical quantitation limit (PQL) is defined as the lowest concentration reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions and is analogous to the limit of quantitation (LOQ) definition in the most recent available NELAC Standard (National Environmental Laboratory Accreditation Conference). The PQL is method, instrument, and analyte specific and may be updated as more data becomes available. The PQL must be below the groundwater protection standard established for that analyte as defined by 30 Texas Administrative Code Section 330.409(h) unless approved otherwise by the TCEQ. The precision and accuracy of the PQL shall be initially determined from the PQLs reported over the course of a minimum of eight groundwater monitoring events. The results obtained from these events shall be used to demonstrate that the PQLs meet the specified precision and accuracy as shown in the table below. The PQL will be supported by analysis of a PQL check sample, which is a laboratory reagent grade sample matrix spiked with chemicals of concern at concentrations equal to or less than the PQL. At a minimum, a PQL check sample will be performed quarterly during the calendar year to demonstrate that the PQL continues to meet the specified limits for precision and accuracy as defined in the table below.

8 BACKGROUND SAMPLES

As specified in the TCEQ (30 TAC 330.407) regulations, background data for the Detection Monitoring Constituents must be established. Establishing background data will consist of collecting independent samples from each monitor well at least once a quarter for a period of two years. If additional samples are needed for the statistical analysis, they will be collected no closer than 30 days apart. The quarterly sampling will provide data representative of each of the four seasons of the year. ~~The analytical parameters to be tested include those metal constituents presented in~~ All of the 47 volatile organic compounds and 15 metals of Appendix I to Part 258 – Constituents for Detection Monitoring will be included as the parameters to be tested (see Table 2). Upon completion of background monitoring and during background updates, the facility will evaluate the data to ensure that they are representative of background groundwater constituent concentrations unaffected by waste management activities or other sources of contamination. The evaluation will be documented in a report and submitted to the executive director before the next subsequent groundwater monitoring event following the updated (or initial) background period.

9 DETECTION MONITORING

Pursuant to 30 TAC 330.407, after completion of background sampling, all the monitor wells will be sampled on a semi-annual basis starting six months after completion of the last background sampling event. Sampling is expected to continue for the life of the site and the post-closure period. If a Statistically Significant Increase (SSI) occurs or the site conditions change, or if the Executive Director deems it necessary, sampling frequencies may change.

The objective of detection monitoring is to identify specific constituents that may be leaking from the site, therefore a sample of the leachate will be analyzed on an annual basis for the detection monitor parameters. The leachate analysis may be useful in establishing the actual constituents likely to be found in water samples, thereby supporting a reduction in the number of parameters monitored in the monitor wells with executive director approval.

9.1 Ground Water Analysis Result Submittals

Evaluation of VOCs and statistical analysis of metals will be performed in accordance with Appendix C no later than 60 days after each semi-annual sampling event. In the event that a VOC is detected or statistical analysis of the groundwater analytical results indicates an initial statistically significant increase (SSI) from background of any tested constituent metal at any on-site well, a notice in writing to the Executive Director will be submitted within fourteen (14) days of the determination of the SSI (30 TAC §330.407(b)).

Three (3) copies (triplicate) of an annual detection monitoring report describing groundwater sampling and analysis results will be completed on state reporting forms (e.g. TCEQ-0312 or subsequent versions) and will be submitted to the TCEQ no later than ninety (90) days after the facility's last groundwater sampling event in a calendar year and will include information determined since the previously submitted annual report (30 TAC §330.407(c)). In the event the facility is in assessment monitoring, three (3) copies (triplicate) of an annual assessment monitoring report describing groundwater sampling and analyses results will be completed on state reporting forms (e.g. TCEQ-

0312 or subsequent versions) and will be submitted to the TCEQ no later than sixty (60) days after the facility's last groundwater sampling event in a calendar year and will include information determined since the previously submitted annual report (30 TAC §330.409(k)). The annual detection and assessment reports will also include all other information required in §330.407(c)(1-6) and §330.409(k)(1-6), respectively.

The facility will submit a laboratory case narrative (LCN) and a laboratory checklist with all analysis submitted to the TCEQ. In place of the laboratory checklist, the facility may submit a copy of the laboratory QA/QC and analytical data. The facility will also provide laboratory analytical data as requested by the executive director. Analytical laboratory reports, if requested by the TCEQ, may be submitted either electronically or in hard copy form. Attempts to explain any problems encountered in the laboratory analysis, will either be done by adding additional explanations to the checklist or by extending the LCN. Any information required in the LCN that cannot be completed by the laboratory will be completed by the permittee.

9.2 Volatile Organic Compounds

Evaluation of VOCs in Table 2 of this GWSAP (i.e. 30 TAC §330.419) will commence upon the first sampling event. Data analyses for VOCs will be accomplished by comparing analytical results to laboratory PQLs. An initial exceedence will be based on any VOC detected in monitor wells at a concentration above the PQL. If a VOC is detected at any on-site monitoring well, a notice will be made to the Executive Director (ED) within fourteen (14) days of the determination of the SSI.

9.29.3 Statistically Significant Constituents Metals and Verification Resampling

Statistical analysis of metal constituents in Table 2 (i.e. 30 TAC §330.419) will commence within six (6) months after completion of the eight (8) quarterly background events. Statistical analysis will be performed in accordance with Appendix C. ~~Statistical analysis of VOCs in Table 2 (i.e. 30 TAC §330.419) will commence upon the first sampling event.~~ An initial Statistical Significant Increase (SSI) will be based on any ~~compound~~ metal detected in any on-site monitor well at a concentration above the specific constituent's statistical limit. If an initial SSI of any ~~constituent~~ metal is indicated at any on-site monitoring well, a notice will be made to the Executive Director (ED) within fourteen (14) days of the determination of the SSI.

9.4 Verification Resampling

In the event of an initial VOC detection or an initial metal SSI for any constituent listed in 30 TAC §330.419, the results of resampling as appropriate for the statistical method being used will be submitted within 60 days of the notification of the initial SSI exceedence in accordance with 30 TAC §330.407(b)(2).

In the event that one or more constituents listed in 30 TAC §330.419 are confirmed through verification resampling ~~as an SSI~~ in any on-site monitor well and no source other than the MSWLF, error, or natural variation is demonstrated per 30 TAC §330.407(b)(43)(B), then per §330.407(b)(4) within the timeframes specified in §330.407(b) 90 days of notification to the ED, assessment monitoring will be initiated at the well(s) exhibiting the VOC detection or metal SSI, and within the immediately adjacent wells on each side of the well(s) exhibiting the ~~SSI~~ exceedence, unless an alternative subset of wells is designated by the executive director.

decontaminated. They will be used to verify adequate decontamination procedures have been used with the sampling equipment.

Split Duplicates are used to check the accuracy of the laboratory techniques. Split duplicates will consist of two samples taken from the same well and handled identically. One sample will be analyzed by the principal laboratory while the other sample will be analyzed by another independent laboratory.

Field QC samples will be collected at the following frequency:

Trip Blanks	1 per sampling event
Field Blanks	1 per sampling day
Field Duplicates	1 per sampling event
Equipment Blanks	1 per sampling event only if non-dedicated purging equipment is employed.
Split Duplicates	as requested by the Commission

Collected field QA/QC samples will be noted on Field Data Sheets and Chain-of-Custody (COC). All field notes will be completely and accurately documented. All field information will be entered on a standard Field Data Sheet (see Appendix A). All entries should be legible and made in indelible ink. Entry errors will be crossed out with a single line, dated, and initialed by the person making the corrections. The Field Data Sheets and COC will be produced, collected, stored and made available for future TCEQ requests and or inspections.

10.2 Laboratory QA/QC

The facility will submit laboratory data and analyses prepared by a TCEQ-accredited environmental testing laboratory and in accordance with acceptable accreditation standards (e.g. NELAC).

The owner or operator shall review all analytical data submitted under the requirements of this permit to ensure compliance with data quality objectives, prior to submittal of the data to the commission for review. This data review must include examination of the quality control results and other supporting data, including any data review by the laboratory and must identify any potential impacts such as bias on the quality of the data using qualifiers in the test reports tied to explanations in footnotes and in any laboratory case narrative which is required.

