



October 23, 2008  
Project No. 08-10-12

P. Hunt Prompuntagorn  
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 September 23, 2008,  
ECD Ellis County Landfill, MSW Permit No. 1745-B, Ellis County, Texas;  
WWC12427720; RN100242460/CN600134985**

Dear Mr. Prompuntagorn:

On behalf of the ECD Ellis County Landfill, this letter is written to provide responses to comments contained in a letter dated September 23, 2008, from the Texas Commission on Environmental Quality (TCEQ). The letter requested that the comments be addressed within 30 days (October 23, 2008). The TCEQ comments are provided below in italics with our response immediately following.

Comment 1: *We found at least one change which was not delineated in the response letter has been made in the 1<sup>st</sup> NOD response. Please make sure that any changes, not in response to our comments, be mentioned in the response letter. The one we found is on page 5-6 of Attachment 5 of the Site Development Plan (SDP). The bullet at the very top of the page has been revised to indicate that the newly proposed monitor wells will be installed within one year of the approval date of this permit modification request. We recommend revising this bullet to indicate that these newly proposed monitor wells will be installed within 90 days of the approval date of this permit modification request. Please revise the mentioned bullet as recommended.*

*In addition, a response to the 1<sup>st</sup> NOD indicated that the appropriate sections of Attachments 4, 5, and 11 of the SDP were revised in the March 2008 permit modification request. However, the Attachment 4 of the SDP is not included. Please provide a revision to the Attachment 4 of the SDP for review.*

Response: The facility maintains the need for a sufficient amount of time to adequately budget for new wells, schedule drilling, and organize other necessary functions associated with such a project. The facility proposes a 180 day timeframe from approval of the permit modification. As agreed

to with TCEQ on a September 30, 2008 meeting. Page 5-6 of Attachment 5 has been revised to reflect the 180 day allowance.

The statement "...the appropriate sections of Attachments 4, 5, and 11 of the SDP were revised in the March 2008 permit modification request." This statement is incorrect, it should say Attachments 5 and 11 were revised, Attachment 4 was not revised in the March 2008 permit modification request, therefore Attachment 4 was not submitted.

Comment 2: *Page 5-8 of Attachment 5 of the SDP indicated that monitor wells details for the new proposed monitor wells will be submitted following installation activities. It is imperative that these wells details are provided for review. Please provide these wells details.*

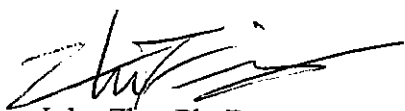
Response: Figure 5A.3 has been added to include the monitor well details. The details are extrapolated or interpolated from the adjacent existing monitor wells after reviewing the geologic and groundwater condition at the relevant points.

Comment 3: *Please update the Groundwater Monitoring System Design Certification to cover new supporting information since the initial submittal.*

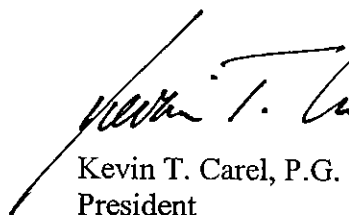
Response: The requested change has been made and the revised pages are attached.

We trust this information meets your approval. Please call if you have any questions.

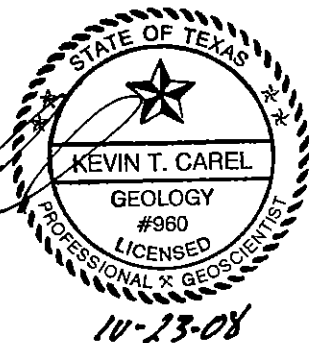
Sincerely,  
THE CAREL CORPORATION



John Zhu, Ph. D.  
Hydrogeologist



Kevin T. Carel, P.G.  
President



Att.: TCEQ Part 1 Application Page 1 and Signature Page  
Attachment 5 – Underlined/Strikeout Replacement Pages  
Attachment 5 – Clean Replacement Pages

cc: TCEQ Region 4 Office  
Mark Meadows – Allied Waste Industries  
Mark Allendorf – Allied Waste Industries (e-copy)  
John Helms – Ellis County Landfill

**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:	Ellis County Landfill			
Physical or Street Address (if available):	5703 N IH-45			
(City) (County)( State)( Zip Code):	Ennis	Ellis	TX	75119
(Area Code) Telephone Number:	972-875-6402			
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:	Ellis County Landfill TX, LP			
Mailing Address:	5703 N IH-45			
(City) (County)( State)( Zip Code):	Ennis	Ellis	TX	75119
(Area Code) Telephone Number:	972-875-6402			
(Area Code) FAX Number:	972-875-9460			
Charter Number:				

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

Permittee Name:	Same as Operator			
Physical or Street Address (if available):				
(City) (County)( State)( Zip Code):				
(Area Code) Telephone Number:				
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 checked="" type="checkbox"/> w/Public Notice		
	<input type="checkbox"/> w/out Public Notice	<input checked="" type="checkbox"/> Notice of Deficiency Response	

<sup>1</sup> 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].

