



February 28, 2010
Project No. 10-02-24

Mr. T. Wesley McCoy, P.G.
MC-124, MSW Division
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Re: Response to a TCEQ Notice of Deficiency Letter Dated January 29, 2010, Hutchins Landfill, MSW Permit No. 1236-A, Dallas County, Texas; WWC No. 12935493; RN103049607/CN600260426

Dear Mr. McCoy:

This letter is written to provide a response to the comments in a letter dated January 29, 2010, from the Texas Commission on Environmental Quality (TCEQ). The letter requested that the TCEQ comments be addressed within 30 days (February 28, 2010). The TCEQ's comment/questions are provided below in italics with our response immediately following.

Comment 1: *2.4.5 Purge Volume, page 8, measurement and stabilization of field parameters indicates that a document "Low-Flow" Purging and Sampling Evaluation" was used, but no reference for this document was given. The proposed stabilization criteria for various constituents does not match that given in the Guidelines for Low-Flow Purging and Sampling at Municipal Solid waste Landfills, 1996, which uses Puls and Barcelona, 1995, as a guideline. The recommended stabilization criteria, which also match that in the USGS National Field Manual and the EPA Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures are $\pm 0.1^{\circ}\text{C}$ for temperature and $\pm 3\%$ for specific conductance. Please change the stabilization criteria for temperature and specific conductance to match acceptable field sampling guidance documents.*

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

Comment 2: *Please be advised that under the requirements of §330.403(a)(2), the monitor well spacing for a municipal solid waste landfill unit shall not exceed 600 feet along the point of compliance without an applicable site-specific technical demonstration, which may include the use of a multi-dimensional fate and transport flow model. Documentation should be provided to demonstrate compliance with this rule.*

Mr. T. Wesley McCoy, P.G.

February 28, 2010

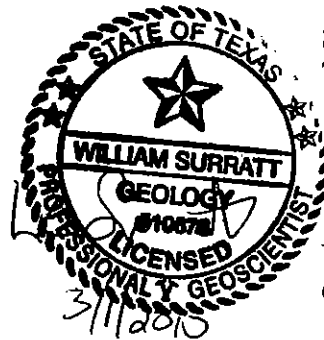
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Response: In accordance with 30 TAC §330.401(a), facilities that have closed in accordance with §330.453, 330.455 and 330.457, prior to the effective date of the comprehensive rule revisions of Chapter 330 as adopted in 2006 (2006 Revisions) may continue to monitor groundwater using the well location requirements contained in previously issued authorizations, as allowed by 30 TAC §330.1(a)(1) (relating to Purpose and Applicability). The Hutchins landfill stopped receiving waste in 1992 and was approved for closure in 1996, therefore, the new 600 feet well spacing requirements do not apply.

Comment 3: *Table 1, constituent PQLs should be evaluated to insure that the number given is as low as the laboratory can practically analyze. The following language should be added to the GWSAP, section 12.0 Quality Assurance and Quality Control Samples:*

Response: The requested information is contained in Section 4.1, Monitoring Constituents and Tests Methods of the GWSAP. Please note that Section 12.0 Quality Assurance and Quality Control Samples, is not a section in the Hutchins GWSAP.

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

A handwritten signature in black ink that reads "William D. Surratt".

William D. Surratt, P.G.
Groundwater Services Manager

cc: TCEQ Region 4 Office
Mark Meadows – BFI Waste Systems of North America, Inc.
Mark Allendorf – Republic Services, Inc. (e-copy)
Tim Branson – Hutchins Landfill

ATTACHMENT 1

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:	Hutchins Landfill			
Physical or Street Address (if available):	1450 E. Cleveland Street			
(City) (County)(State)(Zip Code):	Hutchins	Dallas	TX	75141
(Area Code) Telephone Number:	972-434-2015			
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 :	BFI Waste Systems of North America, Inc.			
Mailing Address:	911 E Highway 121 Business, Suite 201			
(City) (County)(State)(Zip Code):	Lewisville	Denton	TX	75057
(Area Code) Telephone Number:	972-434-2015			
(Area Code) FAX Number:	972-434-7069			
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):			TX	
(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 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 Meadows (Operator), Environmental Manager (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: [Handwritten Signature] Date: 2/22/10

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.

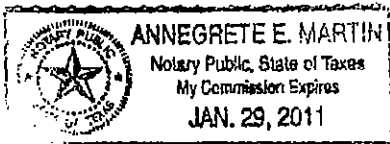
Printed or Typed Name of Operator or Principal Executive Officer

Signature

SUBSCRIBED AND SWORN to before me by the said Mark Meadows

On this 22nd day of February, 2010

My commission expires on the 29th day of January, 2011



Annegrete E. Martin
Notary Public in and for
Denton County, Texas

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

ATTACHMENT 2

Underline/Strikeout GWSAP Pages

**HUTCHINS LANDFILL
DALLAS COUNTY, TEXAS
MSW PERMIT NO. 1236A**

**GROUNDWATER SAMPLING AND
ANALYSIS PLAN (GWSAP)**

Prepared for:

BFI Waste Systems of North America, Inc.

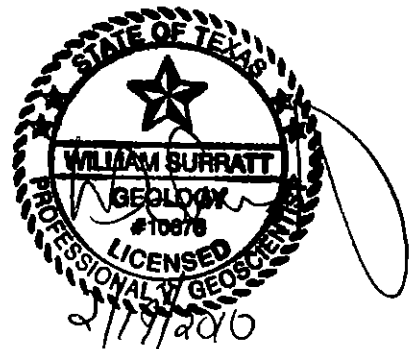
~~December 2009~~

February 2010

Prepared by:

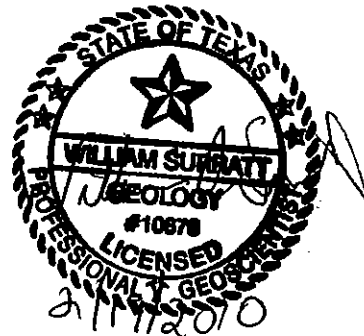


136 Pecan Street
Keller, Texas 76248
(817) 337-0112



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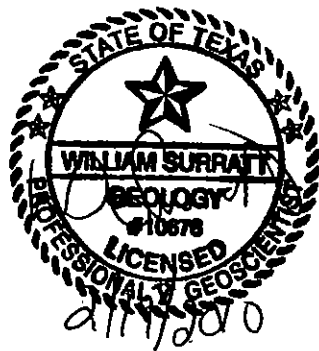
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TABLES

Tables

- 1 Background/Detection Monitoring Parameters



- Initiate pumping and adjust controller to desired flow rate.
- Continue pumping until purge criteria are met.

Rate of discharge and volume purged will be checked periodically with a graduated bucket and/or timer. Field parameter (temperature, pH, specific conductivity, and turbidity) measurements will be recorded after each well volume of water removed during purging.

2.4.5 Purge Volume

Wells will be purged three (3) casing volumes or to dryness. The casing volume is the amount of water in the casing prior to purging and does not include the volume of water in the filter pack area. In addition to purging the three (3) casing volumes, measurements of temperature, pH, conductivity, and turbidity will be recorded after removal each well volume of water. Measurements will be recorded on Field Data Sheets (Appendix A) or equivalent forms.

In the event low-flow purging is proposed and approved for a monitoring well at the facility the following procedures will be followed. Well purging will be conducted at a rate of approximately 100 milliliters per minute until a minimum of two pump and tubing volumes have been removed and stabilization of field parameters is achieved (parameter stabilization is defined above). During low-flow purging, measurements will be recorded on the field data sheet every three to five minutes. Water level measurements will also be taken every three to five minutes and recorded on the field data sheet. An initial decrease in water level may be expected due to pump and tubing evacuation, however, no subsequent continuous drawdown is to be expected.

Parameter stabilization is defined as:

- Specific Conductivity = $\pm 10\%$ for three (3) consecutive measurements;
- pH = ± 0.2 standard pH units for three (3) consecutive measurements;
- Temperature = $\pm 10\%$ 0.1°C for three (3) consecutive measurements;
- Turbidity = $\pm 10\%$ for three (3) consecutive measurements unless under 10 NTU (all values under 10 NTU are considered stable).

2.4.6 Purge Water Management

If purge water is known to be historically contaminated or suspect due to prior analytical data, the water shall be stored in appropriate containers until analytical results are

ATTACHMENT 3

Clean/Replacement GWSAP Pages

**HUTCHINS LANDFILL
DALLAS COUNTY, TEXAS
MSW PERMIT NO. 1236A**

**GROUNDWATER SAMPLING AND
ANALYSIS PLAN (GWSAP)**

Prepared for:

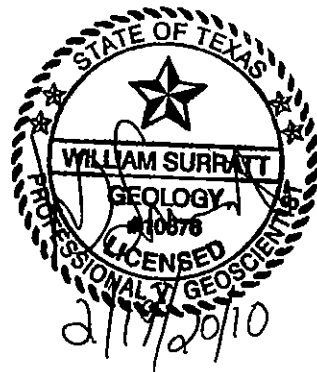
BFI Waste Systems of North America, Inc.

February 2010

Prepared by:

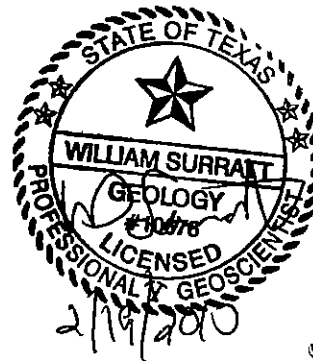


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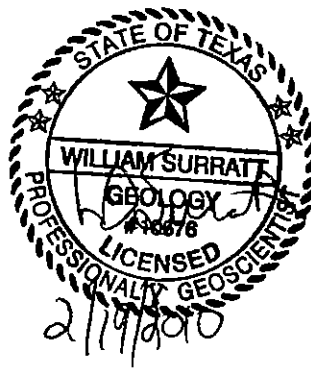
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Parameter stabilization is defined as:

- Specific Conductivity = $\pm 3\%$ for three (3) consecutive measurements;
- pH = ± 0.2 standard pH units for three (3) consecutive measurements;
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