



July 2, 2008  
Project No. 08-06-28

Mr. Samuel Enis, Project Manager  
MC 124  
Municipal Solid Waste Permits Section  
Texas Commission on Environmental Quality  
P. O. Box 13087  
Austin, Texas 78711-3087

**Re: Response to TCEQ Notice of Deficiency Letter Dated June 2, 2008, Itasca Landfill, MSW Permit No. 241C, Hill County, Texas; Tracking No. 11995248; RN100213412 /CN 600343826**

Dear Mr. Dry:

This letter is written on behalf of the Itasca Landfill in response to a Texas Commission on Environmental Quality (TCEQ) correspondence letter dated June 2, 2008. The letter requested that several numbered comments be addressed within 30 days (July 2, 2008). The TCEQ's comments/questions are provided below in italics and our responses immediately follow.

**Comment 1:** *From the monitoring data we have reviewed, MW-2 and MW-7 appear to be consistently dry. In accordance with 30 TAC §330.421(a)(2)(D) the annular seal of the monitoring well should be located in the zone of saturation to maintain hydration. Please discuss why these wells were not proposed to be plugged and the screened location moved down to the weathered-unweathered contact zone, as was proposed for the new monitoring wells. As part of this discussion please provide a table for all point of compliance (POC) wells detailing whether or not each well yielded a water sample for each monitoring event from the last 5 years. Water levels do not need to be provided, just a "dry" or "data" field to show which wells consistently do not provide groundwater data. It is noted that MW-2 and MW-7 have 5 foot screen intervals, while the proposed monitoring wells and many of the existing wells which consistently produce water samples have 10 foot screen intervals. Please discuss the reason for the 5 foot screen intervals in MW-2 and MW-7, as well as MW-3 through MW-6.*

**Response:** Table 1 provides a water production summary since 2003 as requested in the above comment. Monitoring wells MW-1, MW-2, MW-7, MW-12 and MW-18 have been sporadically to consistently dry during their monitoring histories. Well MW-1 has been consistently dry throughout its monitoring history and was proposed to be decommissioned in the permit modification submittal. MW-2 consistently produced water from 1994

through 2005 followed by an approximately two year dry period from September 2005 through September 2007. Well MW-2 did produce a sufficient volume of water for sampling and analysis of the required parameters during the April 2008 monitoring event. The 2005 through 2007 dry period was concurrent with a period of severe regional drought. Monitor well MW-7 has been dry since 2001. MW-12 produced a sufficient volume of water for sampling and analysis of all required parameters through 2001 followed by a period through March 2005 where sufficient volume was produced to sample for VOCs. The well has been dry since 2005. MW-18 has been dry since 2000 except for one event during 2003 in which sufficient water was produced to sample and analyze required parameters. MW-18 has been proposed to be decommissioned in the permit modification.

Wells MW-1 through MW-7 are existing wells with 5-foot screens placed at the times of installation in 1994. Monitoring wells MW-1 through MW-7 were installed for detection monitoring of the Phase I area. Although the screen section of each well is installed at five (5) foot intervals, the filter packs of each well are completed at approximately 10 foot intervals in the weathered portion of bedrock, which predominantly consists of shale. The filter pack is within the uppermost aquifer. Although wells MW-1, MW-2, MW-7, as well as MW-12 and MW-18, are now consistently dry; remaining wells MW-3 through MW-6 are consistently hydrated. They are appropriate groundwater monitoring wells in accordance with 30 TAC §330.421. The facility does propose to decommission and replace MW-2, MW-7, and MW-12. Monitor wells MW-1 and MW-18 continue to be proposed to be decommissioned as part of the overall groundwater monitoring network modification. The replacement wells will be constructed to ensure the depth and the screen section of these wells are placed within the weathered-unweathered contact zone to maximize potential saturation and maintain hydration. Screen intervals will be adjusted to 10 feet. Text discussing the proposed replacement of the listed wells has been incorporated in appropriate sections of Attachment 5. Revised pages are attached.

Comment 2: *Please take note that MSW regulations no longer reference upgradient or downgradient wells. Please revise the permit modification application to reference point of compliance wells or background wells.*

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

Comment 3: *Page 5-10 of the permit modification application states that MW-1 is an upgradient well. However, page 5-A.40 of the currently approved permit lists MW-1 as a downgradient monitoring well and the existing facility POC is drawn to include MW-1. Please explain this inconsistency. Figure 5-A.40.1 details the proposed POC for the facility. Your*

*designation of MW-1 as a background well appears to be appropriate designation. Review of the groundwater monitoring event maps for the facility show that the area east of MW-14 is downgradient from waste and should therefore be included in the POC. Please revise the POC and any applicable drawings to include the region east of MW-14 in the POC.*

Response: MW-1 was designated as an upgradient well in 1993 permitting documentation and was conditionally approved by the TCEQ (then TNRCC) in a letter dated January 4, 1994. MW-1 was installed in June 1994 following additional consideration of groundwater flow and disposal areas. MW-1 has been observed to be dry since October, 1995. In the 1997 major permit modification, MW-1 was included on the POC line on Figure 5-A.40 without explanation or justification. The apparent redesignation of MW-1 to a POC well appears to be in error. Review of historic water level data supports the original designation of MW-1 as a background well. As the MW-1 location is justifiably upgradient of the facility, the well was presented as such in the recent permit modification discussions. However, because MW-1 has been historically dry and sufficient background data has been and continues to be obtainable from background wells MW-10, MW-11, MW-12 (to be replaced with MW-12A), and MW-13, it is considered appropriate to decommission MW-1. As presented in the original permit modification, an additional well (MW-19) is proposed approximately 246 feet southwest of MW-1 along the northern facility boundary. MW-19 will represent the northeastern POC limit. MW-19 will be located 595 feet northeast of proposed MW-2A.

The TCEQ comment regarding MW-14 is acknowledged. Careful re-examination of historical contour maps indicates that a portion of the southern boundary east of MW-14 is sporadically downgradient due to localized minor flow variance. It is therefore proposed to expand the point of compliance from MW-14 to 595 feet east with an additional monitoring well designated as MW-26. The expansion of the POC to the proposed MW-26 location covers the area of historical minor flow variance. Regions east of proposed MW-26 have been consistently upgradient. The revised proposed monitoring network is illustrated on Figure 5-A.40.1. Appropriate text has been modified in Attachment 5. Revised pages are attached.

Comment 4: *Page 5-11 of the permit modification application references the Mexia Landfill. Please revise.*

Response: The reference to the Mexia landfill has been removed from Page 5-11. The revised page is attached.

Comment 5: *The spacing between monitoring wells is unclear due to the scale of Figure 5-A.40.1. In accordance with 30 TAC §330.403(a)(2), the*