



August 20, 2008  
Project No. 08-07-47

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 July 21, 2008, Itasca Landfill, MSW Permit No. 241C, Hill County, Texas; Tracking No. 12359166; RN100213412 /CN 600343826**

Dear Mr. Enis:

This letter is written on behalf of the Itasca Landfill in response to a Texas Commission on Environmental Quality (TCEQ) correspondence letter dated July 21, 2008. The letter requested that several numbered comments be addressed within 30 days (August 20, 2008). The TCEQ's comments/questions are provided below in italics and our responses immediately follow.

Comment 1: *Comment no. 5 of the NOD response letter from Mr. Kevin Carel, P.G. of the Carel Corporation stated that the spacing between all monitoring wells is less than 600 feet except the distance between MW-3 and MW-4. The letter states that the location of MW-4 was shifted westward due to a physical obstacle (flare station) and the resulting spacing is 629 feet. In accordance with 30 TAC §330.403(a)(2), the spacing for monitoring wells should not exceed 600 feet without an applicable site specific demonstration. Please submit an applicable demonstration or revise the spacing to comply with the referenced rule.*

Response: The requested demonstration is attached.

Comment 2: *Comment no. 10 of our previous letter dated June 2, 2008 requested that the word "downgradient" in Section 1.1 of the GWSAP be removed. Section 1.1 details the requirements for determinations of Statistically Significant Increases (SSIs) for volatile organic compounds. The changes do not appear to be included in the GWSAP revisions. In accordance with 30 TAC §330.407(b) please remove the word downgradient from the second and third sentences of Section 1.1.*

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

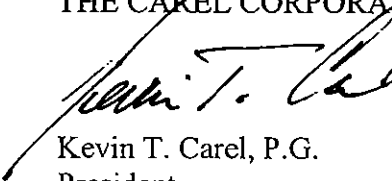
Comment 3: *Section 5.1 of the GWSAP was revised to state that if an SSI is confirmed, assessment monitoring will be initiated in the well exhibiting the SSI and, within a subset of wells that will be negotiated with the TCEQ. The MSW Permits section is requesting that the following language be included in the GWSAP. "If an SSI is verified, assessment monitoring will be initiated at the well(s) exhibiting the SSI and at the immediately adjacent wells on each side of the well(s) exhibiting the SSI, unless an alternative subset of wells is designated by the executive director." Please revise the GWSAP to include the referenced sentence.*

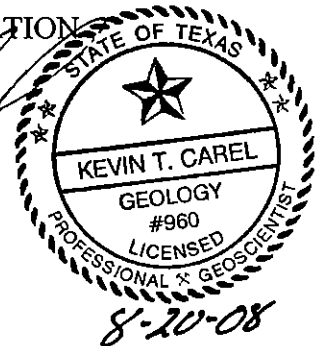
Response: The requested change has been made and revised pages are attached.

Per previous correspondence with the TCEQ regarding other Municipal Solid Waste facilities we have made the following additional revisions to the text of the GWSAP; upgradient well has been changed to background well, downgradient well has been changed to either point of compliance well or on-site well, where appropriate. The last sentence of the first paragraph in Section 4.1, Analyzed Constituents, has been revised to state the following: "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." Revised pages are attached.

We trust that this information is acceptable to you. Please call if you have any questions.

Sincerely,  
THE CAREL CORPORATION

  
Kevin T. Carel, P.G.  
President



Att: TCEQ Part I Application Page 1 and Signature Page  
Alternate Well Spacing Demonstration  
GWSAP – Underlined/Strikeout Replacement Pages  
GWSAP – Appendix F – Underlined/Strikeout Replacement Page  
GWSAP – Clean Replacement Pages  
GWSAP – Appendix F – Clean Replacement Page

cc: TCEQ Region 9 Office  
Jane Berry – Allied Waste Industries  
Mark Allendorf – Allied Waste Industries (e-copy)  
David Cieply – Itasca Landfill

## **Alternate Well Spacing Demonstration**

**ALTERNATE WELL SPACING DEMONSTRATION  
ITASCA LANDFILL  
MSW Permit No. 241-C  
Hill County, Texas**

**Introduction**

On March 27, 2006 the TCEQ implemented new 30 TAC 330 Subchapter J rules governing groundwater monitoring and corrective action. Per 30 TAC 330.401(b) owners and operators of landfill units shall comply with the 2006 Revisions to this subchapter [Subchapter J] by applying for a permit modification with public notice in accordance with 305.70(l) to revise any inconsistent provisions within two years from the effective date of the 2006 Revisions.

A permit modification request to revise the groundwater monitoring system was submitted on March 26, 2008. The ground water monitoring system proposed in the permit modification request is comprised of nineteen monitor wells they are depicted on Figure 5-A.40.1 of Attachment 5, a copy of which is attached. All of the POC wells comply with the 600 foot well spacing criteria stipulated in §330.403(a)(2) except for the space between MW-3 and MW-4, which is 629 feet. A landfill gas flare station is noted to be located between MW-3 and MW-4. The average distance between the POC wells is 575 feet.

The existing and proposed monitoring system is designed to monitor the weathered shale, and the upper portion of the unweathered shale. The 10-foot screen sections will straddle the weathered/unweathered contact. Five to seven feet of the screen will be installed above the contact, and three to five feet will be installed below the contact.

**Status**

In a letter dated July 21, 2008, the TCEQ indicated that in accordance with 30 TAC §330.403(a)(2), the spacing for monitoring wells should not exceed 600 feet without an applicable site specific demonstration and requested that an applicable demonstration be submitted or that the spacing [between MW-3 and MW-4] be revised to comply with the referenced rule. This report provides information intended to comply with the requested demonstration.

**Well Spacing Demonstration**

The purpose of the groundwater monitoring system is to detect a potential release from the facility to the uppermost saturated zone. Groundwater monitoring has been performed since 1994 at the Itasca Landfill. To date only one well MW-4 has had a confirmed detection of a volatile organic compound (acetone). MW-4 is also the only well at the facility to enter into an assessment monitoring program at the facility.

Monitor well MW-4 entered assessment monitoring in September 2004 due to a confirmed detection of acetone. No additional Appendix II parameters that are not part of the standard detection monitoring list were detected in MW-4 during the initial

