



October 10, 2008
Project No. 08-09-23

Mr. Jeff Holderread, Team Leader
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 September 10, 2008,
Itasca Landfill, MSW Permit No. 241C, Hill County, Texas; Tracking No.
12423963; RN100213412 /CN 600343826**

Dear Mr. Holderread:

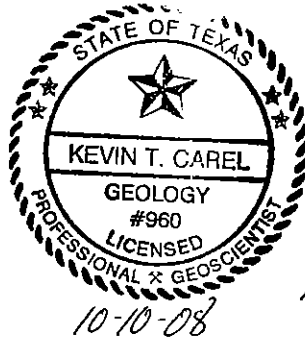
This letter is written on behalf of the Itasca Landfill in response to a Texas Commission on Environmental Quality (TCEQ) correspondence letter dated September 10, 2008. The letter requested that several numbered comments be addressed within 30 days (October 10, 2008). The TCEQ's comments/questions are provided below in italics and our responses immediately follow.

Comment 1: *Comment No. 1 of the previous Texas Commission on Environmental Quality Notice of Deficiency letter stated that the spacing between monitoring wells at the referenced facility should not exceed 600 feet without an applicable site specific demonstration in accordance with 30 TAC §330.403(a)(2). The response contained an alternate well spacing demonstration for the area between MW-3 and MW-4 (629 feet). Our review indicates that insufficient information has been provided to demonstrate spacing less than 600 feet is appropriate. Please revise the modification to show a spacing of less than 600 feet for all wells.*

Response: A meeting was held with TCEQ personnel on September 29, 2008 to discuss the merits of the previously submitted Alternate Well Spacing Demonstration (AWSD) during the meeting it was recommended that the AWSD report be resubmitted for further consideration. As discussed in the meeting, specific facts presented in the original AWSD are reiterated; particularly that MW-4 has been in assessment monitoring, and some additional information is provided.

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



Sincerely,
THE CAREL CORPORATION

A handwritten signature in black ink that reads "Kevin T. Carel".

Kevin T. Carel, P.G.
President

- Att: TCEQ Part I Application Page 1 and Signature Page
Revised Alternate Well Spacing Demonstration
- cc: TCEQ Region 9 Office
Jane Berry – Allied Waste Industries
Mark Allendorf – Allied Waste Industries (e-copy)
David Cieply – Itasca 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:	Itasca Landfill			
Physical or Street Address (if available):	2559 FM 66			
(City) (County) (State) (Zip Code):	Itasca	Hill	TX	76055
(Area Code) Telephone Number:	254-687-2511			
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 :	Itasca Landfill TX, LP			
Mailing Address:	2559 FM 66			
(City) (County) (State) (Zip Code):	Itasca	Hill	TX	76055
(Area Code) Telephone Number:	254-687-2511			
(Area Code) FAX Number:	254-687-2432			
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	

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, Robert Cox (Operator) General 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: 10.08.08

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.

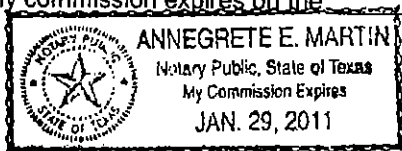
Printed or Typed Name of Operator or Principal Executive Officer

Signature

SUBSCRIBED AND SWORN to before me by the said Robert Cox

On this 8th day of October, 2008

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



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

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

Revised Alternate Well Spacing Demonstration