



August 10, 2009  
Project No. 09-07-21

Matthew Udenenwu  
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 July 9, 2009, Pinehill Landfill, MSW Permit No. 1327B, Gregg County, Texas; Tracking No. 12715744; RN101909737 / CN600129530**

Dear Mr. Udenenwu:

This letter is written on behalf of the Pinehill Landfill in response to a Texas Commission on Environmental Quality (TCEQ) letter dated July 9, 2009. The letter requested that several comments be addressed within 30 days (August 8, 2009). The TCEQ's comments/questions are provided below in italics and our responses immediately follow.

**Comment 1:** *Attachment 5, Section 2.2.3 Groundwater Monitoring System: Concerning the proposal to temporarily convert MW-8 and MW-9 to piezometers pending the installation of MW-18 and MW-19 and within two years prior to placement of waste in Cells 2 through 7, you state that water quality thorough the area monitored by MW-8 and MW-9 represent natural conditions and that the quality of groundwater has continuously been monitored by MW-7, MW-8, and MW-9 since 1995 with no apparent issues.*

*MW-8 and MW-9 have functioned as downgradient wells since 1995; we do not agree with the rationale for suspending detection monitoring at these wells at this time. Existing groundwater data for the wells and groundwater contours for the site do not appear to support the premise that there is no chance that MW-8 and MW-9 are downgradient of the waste currently buried at the site. Groundwater contours recorded in the area of these wells since 1995 suggest periodic variations in the groundwater flow regime, which sometimes puts the wells in the direction of the flow from the currently deposited waste area. We believe that this periodic variation in groundwater flow direction was a major consideration for the installation and monitoring of MW-8 and MW-9. Also, MW-8 has at various times recorded confirmed statistically significant increases for some groundwater monitoring parameters especially barium, potassium, and ammonia, which have been attributed to natural variation. It is necessary that we continue close observation of*

*the data from this well in case other changes are recorded. Cessation of detection monitoring will impede this process. To ensure that the site continues to maintain a complete network of wells and provide complete groundwater data from around the site, we request that detection monitoring continue in MW-8 and MW-9. Alternatively, you may install and monitor additional well points in the area between MW-7 and MW-9 to more accurately depict the characterization of the groundwater contours in the area to support the case that flow from the current waste area has no chance of migrating to MW-8 and MW-9. After sufficient data to that effect have been collected and illustrated, the request to suspend detection monitoring in the said wells may be made for consideration as necessary.*

Response: It is proposed that monitor wells MW-8 and MW-9 remain in detection monitoring and MW-18 and MW-19 be installed as originally proposed. Sections 2.2.3, 2.2.4 and Table 2.2.4-1 of Attachment 5 have been revised accordingly and revised pages are attached.

Comment 2: *Attachment 5, Section 2.2.4 Summary of Proposed Actions:*

*(a) Please check the sentence "New and replacement wells MW-10R, MW-13R, MW-14R, MW-20 and MW-15R will occur within 180 days of final approval of the network" for completeness. Please check whether you meant to state that "installation of new and replacement wells ----- will occur within 180 days of final approval of the network." Please correct the sentence accordingly.*

*(b) Please also check the sentence "Well installation and construction and plugging and abandonment activities and will be in accordance with 30 TAC 330.421" for completeness/accuracy, and provide corrections accordingly.*

Response: The requested changes to Section 2.2.4 have been made as follows:

(a) New sentence reads: "Installation of new and replacement wells MW-10R, MW-13R, MW-14R, MW-20 and MW-15R will occur within 180 days of final approval of the network."

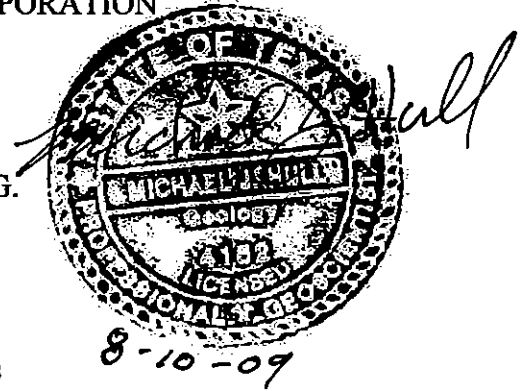
(b) New sentence reads: "Well installation and construction and plugging and abandonment activities will be in accordance with 30 TAC 330.421." Revised pages are attached.

Matthew Udenenwu  
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We trust this information meets your needs, please call Mr. Chris Alderete at (903) 556-1103 or me at (817) 337-0112 if you have any questions.

Sincerely,  
THE CAREL CORPORATION

Michael J. Hull, P.G.  
Geologist



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

cc: TCEQ Region 5 Office  
Chris Alderete – Republic Services, Inc.  
Mark Allendorf – Republic Services, Inc. (e-copy)  
Bill Bybel - Pinehill 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:	Pinehill Landfill			
Physical or Street Address (if available):	1102 Landfill Road			
(City) (County)( State)( Zip Code):	Kilgore	Gregg	TX	75663
(Area Code) Telephone Number:	800-678-7274			
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 <sup>1</sup> :	Pine Hill Farms Landfill TX LP			
Mailing Address:	P.O. Box 1857			
(City) (County)( State)( Zip Code):	Kilgore	Gregg	TX	75663
(Area Code) Telephone Number:	800-678-7274			
(Area Code) FAX Number:	903-983-1827			
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:	1021 Main Street, Suite 1150			
(City) (County)( State)( Zip Code):	Houston	Harris	TX	77002
(Area Code) Telephone Number:	713-658-9486			
(Area Code) FAX Number:	713-658-9720			

#### 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].

Signature Page

I, Chris Alderete (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: 07/24/09

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.

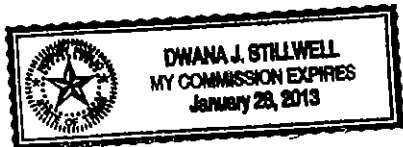
Printed or Typed Name of Operator or Principal Executive Officer

Signature

SUBSCRIBED AND SWORN to before me by the said Chris Alderete

On this 24th day of July, 2009

My commission expires on the 28th day of January, 2013



Dwana J. Stillwell  
Notary Public in and for

Smith County, Texas

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

**Attachment 5**  
**Underlined/Strikeout Replacement Pages**

**PINEHILL LANDFILL  
GREGG COUNTY, TEXAS  
MSW PERMIT NO. 1327-B**

**SITE DEVELOPMENT PLAN PART III  
ATTACHMENT 5  
GROUNDWATER CHARACTERIZATION REPORT**

Prepared for:

Pine Hill Farms Landfill TX, LP

July 1995

Revised August 1995

Revised December 1995

Revised February 1996

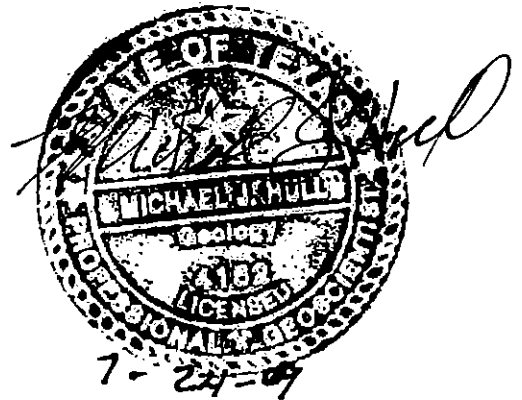
~~Revised June 2009~~

Revised August 2009

Prepared by:



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



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<b>1</b>	<b>SITE HYDROGEOLOGY</b>	<b>1</b>
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1.2	Potentiometric Surface	1
1.3	Recharge/Discharge Mechanisms	2
1.4	Groundwater Flow Regime	2
	1.4.1 Direction	2
	1.4.2 Velocity	2
1.5	Groundwater Quality	2
<b>2</b>	<b>GROUNDWATER MONITORING SYSTEM</b>	<b>4</b>
2.1	Existing TCEQ-Approved Groundwater Monitoring System	4
2.2	Proposed Groundwater Monitoring System	4
2.3	Groundwater Sampling and Analysis Plan (GWSAP)	11

**APPENDIX 5A**

Water-Level Information

**APPENDIX 5B**

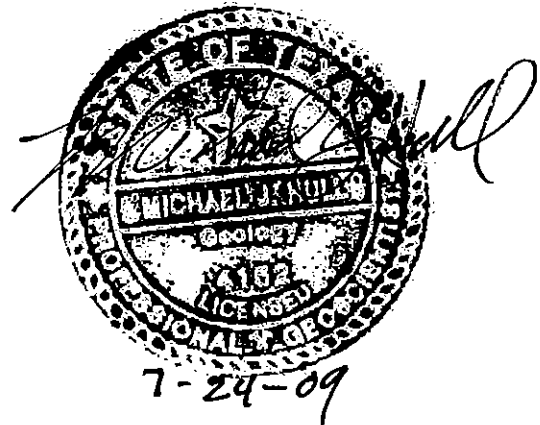
TNRCC Approval Letter

**APPENDIX 5C**

Existing Groundwater Monitoring System	Sheet 5C-1
Revised Groundwater Monitoring System	Sheet 5C-2
12/08 Groundwater Contour Map	Sheet 5C-3
Average Flow Vectors and Flow Vector Rose Diagrams	Sheet 5C-4
Revised Groundwater Monitoring System with Selected Critical Features	Sheet 5C-5
Groundwater Monitoring System Details	Sheet 5C-6

**APPENDIX 5D**

Groundwater Monitoring System Design Certification



### 2.2.3 Groundwater Monitoring System

A groundwater monitoring system is proposed following the design criteria as has been discussed. Site-specific critical features have been considered and a point of compliance groundwater monitoring network is proposed. The existing groundwater monitoring system is comprised of twelve wells where MW-6, MW-7, MW-16, and MW-17 are hydraulically upgradient. Existing wells MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, and MW-15 are hydraulically downgradient. The existing groundwater monitoring system is illustrated on Sheet 5C-1. It is proposed to decommission MW-10 along the northern boundary, and replace with MW-10R at an optimized location approximately 225 feet east of MW-10. It is proposed to add an additional well (MW-19) approximately 350 feet west of the current MW-10 location (approximately 547 feet west of proposed MW-10R). It is proposed to replace MW-13, MW-14 and MW-15 with MW-13R, MW-14R, and MW-15R at locations optimized relative to critical features and the minimum well spacing requirement. It is proposed to add new well MW-20 along the northern boundary at an optimized location between MW-12 and proposed well MW-14R. Wells MW-11 and MW-12 are proposed to remain at their current locations. New well MW-18 is proposed to be installed at an optimized location south of current well MW-9 and north of MW-8 along the western boundary. Wells MW-8 and MW-9 are proposed to be retained at their current locations. The proposed point of compliance (POC) will extend north from MW-8 through MW-18 and MW-9; along the northern boundary from MW-19 through MW-10R, MW-11, MW-13R, MW-14R, MW-20, MW-12 and southeast to MW-15R. Background (upgradient) wells MW-7, MW-6, and MW-16 will be retained. Upgradient well MW-17 will be converted to an observation well for water levels only. The updated groundwater monitoring system is comprised of fourteen (14) monitor wells and one (1) piezometer. Installation of MW-18 and MW-19 will be phased in within two years prior to construction activities for future Sectors 2 through 7. On an interim basis, upgradient well MW-7 and compliance wells MW-8 and MW-9 will be utilized as converted to an observation wells for monitoring of water levels only until installation of MW-18 and MW-19, at which time sampling will continue. Wells MW-7, MW-8, and MW-9 have has continuously monitored the undeveloped western area of the property since March 1995 with no apparent issues. Well MW-7 is upgradient of the facility property, and compliance wells MW-8 and MW-9 do not monitor any areas of previous or current waste disposal. Proposed changes are illustrated on Sheet 5C-2. The revised groundwater monitoring system is illustrated on Sheet 5C-2 of Appendix 5C. The groundwater monitoring system proposed in compliance with 30 TAC 330.403(a) and (e) relative to selected critical features is illustrated on Sheet 5C-5. All wells along the point of compliance meet the 600 feet or less spacing criteria. Wells spacings are provided on Sheet 5C-5.

The relocation of MW-10 to MW-10R and installation of new well MW-19 relative to MW-11 and MW-9 reduces the well spacing along the northwestern point of compliance in an area with multiple critical features. Wells MW-9, MW-10R and MW-19 provide adequate coverage in an area of groundwater confluence and between future disposal cell areas and the Sabine River. The location of existing well MW-11 continues to provide coverage of the area of groundwater confluence and between the facility and the Sabine River. Relocation of MW-14 to MW-14R and installation of new well MW-20 relative to

MW-12 reduces the well spacing along the northern point of compliance to within 600 feet and provides optimized coverage of the eastern half of the facility. Relocation of MW-15R relative to MW-12 reduces the well spacing along the northeastern point of compliance to within 600 feet and optimizes coverage of the periodic localized north to northeastern flow component and in anticipation of future construction of the northeastern pond.

Proposed well MW-18 and existing wells MW-8 and MW-9 provide coverage of the western facility boundary. MW-18 tightens the well spacing in conjunction with MW-8 and MW-9 and optimizes coverage of the localized western flow component induced by the current natural surface drainage channel and future pond. Well MW-17 provides redundant upgradient coverage with MW-6 and MW-16 and is therefore proposed to be converted to an observation well. MW-17 will continue to provide semi-annual groundwater surface elevation and flow vector data. The proposed observation wells are constructed to monitor well specifications and groundwater samples may be collected from them as necessary to aid in future alternate source demonstrations or other hydrogeology related investigations at the site.

#### **2.2.4 Summary of Proposed Actions**

Table 2.2.4-1 provides monitoring well status and proposed actions. Proposed installation of MW-18, and MW-19 will be phased in two years prior to initiation of cell construction activities of future Sectors 2 through 7. Wells MW-7, MW-8, and MW-9 will be utilized as piezometers converted to an observation well until installation of MW-18 and MW-19, at which time sampling will continue. Conversion of MW-17 to an observation well will occur upon approval of the proposed network. Installation of New and replacement wells MW-10R, MW-13R, MW-14R, MW-20, and MW-15R will occur within 180 days of final approval of the network. Well installation and construction and plugging and abandonment activities and will be in accordance with 30 TAC 330.421. Decommissioning will occur after background has been established on the new wells. New wells will be installed to an appropriate depth within the saturated interval of the Reklaw Formation. A report documenting the proposed activities will be provided following completion.

Table 2.2.4-1  
Monitoring Well Status and Proposed Action

Monitoring Well	Classification	Proposed Action
MW-16	Background	None
MW-17	Background/Piezometer	Convert to observation well
MW-6	Background	None
MW-7	Background	None, Utilize as interim observation well per Section 2.2.3
MW-8	Compliance Well	None, Utilize as interim observation well per Section 2.2.3
MW-18	Compliance Well	Install as new well
MW-9	Compliance Well	None, Utilize as interim observation well per Section 2.2.3
MW-10	Compliance Well	Plug and abandon/relocate and replace with MW-10R
MW-10R	Compliance Well	Replacement well for MW-10
MW-19	Compliance Well	Install as new well
MW-11	Compliance Well	None
MW-13	Compliance Well	Plug and abandon/relocate and replace with MW-13R
MW-13R	Compliance Well	Replacement well for MW-13
MW-14	Compliance Well	Plug and abandon/relocate and replace with MW-14R
MW-14R	Compliance Well	Replacement well for MW-14
MW-20	Compliance Well	Install as new well
MW-12	Compliance Well	None
MW-15	Compliance Well	Plug and abandon/relocate and replace with MW-15R
MW-15R	Compliance Well	Replacement well for MW-15

### 2.3 Groundwater Sampling and Analysis Plan (GWSAP)

Sampling and analytical testing for the proposed monitoring well network will be performed consistent with the TCEQ regulations outlined in 30 TAC §330 Subchapter J and the facility Groundwater Sampling and Analysis Plan (GWSAP). A detailed GWSAP is presented in Attachment 11. This plan has been approved by the TCEQ to monitor the existing groundwater monitoring system.

**Attachment 5**  
**Clean Replacement Pages**

**PINEHILL LANDFILL  
GREGG COUNTY, TEXAS  
MSW PERMIT NO. 1327-B**

**SITE DEVELOPMENT PLAN PART III  
ATTACHMENT 5  
GROUNDWATER CHARACTERIZATION REPORT**

Prepared for:

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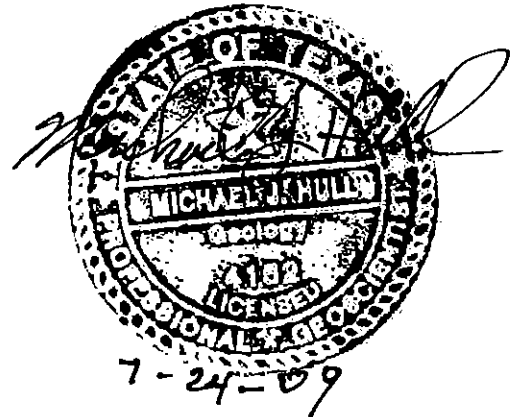
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## APPENDIX 5B

TNRCC Approval Letter

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MW-15R relative to MW-12 reduces the well spacing along the northeastern point of compliance to within 600 feet and optimizes coverage of the periodic localized north to northeastern flow component and in anticipation of future construction of the northeastern pond.

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#### **2.2.4 Summary of Proposed Actions**

Table 2.2.4-1 provides monitoring well status and proposed actions. Proposed installation of MW-18, and MW-19 will be phased in two years prior to initiation of cell construction activities of future Sectors 2 through 7. Well MW-7 will be converted to an observation well until installation of MW-18 and MW-19, at which time sampling will continue. Conversion of MW-17 to an observation well will occur upon approval of the proposed network. Installation of new and replacement wells MW-10R, MW-13R, MW-14R, MW-20, and MW-15R will occur within 180 days of final approval of the network. Well installation and construction and plugging and abandonment activities will be in accordance with 30 TAC 330.421. Decommissioning will occur after background has been established on the new wells. New wells will be installed to an appropriate depth within the saturated interval of the Reklaw Formation. A report documenting the proposed activities will be provided following completion.

Table 2.2.4-1  
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MW-7	Background	None, Utilize as interim observation well per Section 2.2.3
MW-8	Compliance Well	None
MW-18	Compliance Well	Install as new well
MW-9	Compliance Well	None
MW-10	Compliance Well	Plug and abandon/relocate and replace with MW-10R
MW-10R	Compliance Well	Replacement well for MW-10
MW-19	Compliance Well	Install as new well
MW-11	Compliance Well	None
MW-13	Compliance Well	Plug and abandon/relocate and replace with MW-13R
MW-13R	Compliance Well	Replacement well for MW-13
MW-14	Compliance Well	Plug and abandon/relocate and replace with MW-14R
MW-14R	Compliance Well	Replacement well for MW-14
MW-20	Compliance Well	Install as new well
MW-12	Compliance Well	None
MW-15	Compliance Well	Plug and abandon/relocate and replace with MW-15R
MW-15R	Compliance Well	Replacement well for MW-15

### 2.3 Groundwater Sampling and Analysis Plan (GWSAP)

Sampling and analytical testing for the proposed monitoring well network will be performed consistent with the TCEQ regulations outlined in 30 TAC §330 Subchapter J and the facility Groundwater Sampling and Analysis Plan (GWSAP). A detailed GWSAP is presented in Attachment 11. This plan has been approved by the TCEQ to monitor the existing groundwater monitoring system.