



September 15, 2008  
Project No. 08-08-36

P. Hunt Prompuntagorn  
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 August 15, 2008, Royal Oaks Landfill, MSW Permit No. 1614-A, Cherokee County, Texas; WWC12378896; RN101927010/CN600129530**

Dear Mr. Prompuntagorn:

On behalf of the Royal Oaks Landfill, this letter is written to provide responses to comments contained in a letter dated August 15, 2008, from the Texas Commission on Environmental Quality (TCEQ). The letter requested that the comments be addressed within 30 days (September 14, 2008). The TCEQ comments are provided below in italics with our response immediately following.

Comment 1: *Your response to Comment No. 2 of the first NOD indicates that a cross section has been drawn in Figure 4-4 of Attachment 5 along the eastern boundary, passing through monitoring well (MW-20) and MW-21. The provided Figure 4-4 is incomplete. The mid portion of the figure is missing. Your response also indicates that Aquifer B has been cut off due to erosion by a stream flowing easterly and the presence of groundwater will be too thin along the outcrop for optimal groundwater monitoring, and therefore, MW-20 should move slightly north (713 feet away from MW-21) in order to avoid a potential dry well situation. We can not make a determination for the proposed more-than-600 foot well spacing until we receive the mentioned cross section drawing, Figure 4-4 of Attachment 5. Please provide the complete copy of the mentioned Figure 4-4. In addition, Figure 4-3 of Attachment 5 shows that the distance along the point of compliance (POC) between the existing monitoring well MW-15 and the proposed monitoring well MW-20 is more than 600 feet. Please adjust this well spacing to meet the required 600-foot well spacing or provide a demonstration for the proposed well spacing.*

Response: A complete copy of Figure 4-4 of Attachment 5 is attached.

Per our conversation on August 21<sup>st</sup>, 2008, we understand that MW-20 in the last sentence of your comment should be MW-21. The location of MW-21 has been adjusted per your request. Please note that the text

Mr. P. Hunt Prompungorn

September 15, 2008

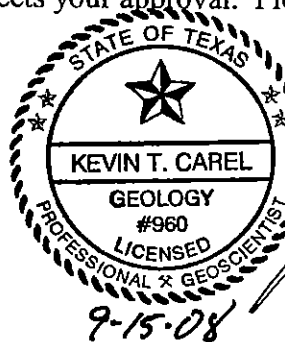
Page 2

regarding the spacing between MW-20 and MW-21 is now 749 feet, the revised pages are attached.

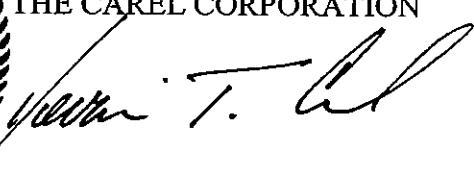
Comment 2: *Your response to Comment Nos. 2 and 3 of the first NOD makes reference to Figures 3-1 and 5A-20 regarding aquifer information, POC, Groundwater flow pattern, and required groundwater monitoring wells. Based on information provided, it is possible that groundwater within the Aquifer A beneath the landfill will cross the eastern POC between 200 feet and 400 feet south of MW-14. We recommend an additional groundwater detection monitoring well at approximately 300 feet south of MW-14.*

Response: Your recommendation to install an addition groundwater monitoring well approximately 300 feet south of MW-14 is noted. However, after consideration the facility operator does not believe that the requested well is warranted because MW-15 and MW-23 are within the 600 foot spacing required by 30 TAC 403(a)(2). Further, as illustrated by Figure 3-1, the Weches Formation has a limited extent in the area of interest. In fact, the Weches Formation may only be present a few feet beyond the property boundary if excavated out by the adjacent City of Jacksonville Landfill. If this case exists, the requested groundwater monitoring well would be essentially useless.

We trust this information meets your approval. Please call if you have any questions.



Sincerely,  
THE CAREL CORPORATION

  
Kevin T. Carel, P.G.  
President

Att.: TCEQ Part 1 Application Page 1 and Signature Page  
Attachment 4 – Underlined/Strikeout Replacement Pages  
Attachment 4 – Clean Replacement Pages  
Attachment 5 – Underlined/Strikeout Replacement Pages  
Attachment 5 – Clean Replacement Pages

cc: TCEQ Region 5 Office  
Chris Alderete – Allied Waste Industries  
Mark Allendorf – Allied Waste Industries (e-copy)  
Doug Southern – Royal Oaks 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:	Royal Oaks Landfill			
Physical or Street Address (if available):	608 CR 4102			
(City) (County) (State) (Zip Code):	Jacksonville	Cherokee	TX	75766
(Area Code) Telephone Number:	903-586-1449			
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> :	Pinehill Farms Landfill TX LP			
Mailing Address:	P.O. Box 440			
(City) (County) (State) (Zip Code):	Jacksonville	Cherokee	TX	75766
(Area Code) Telephone Number:	903-586-1449			
(Area Code) FAX Number:	903-586-6568			
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 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].

