



November 19, 2008  
Project No. 08-10-52

P. Hunt Prompungorn  
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 October 20, 2008,  
Royal Oaks Landfill, MSW Permit No. 1614-A, Cherokee County, Texas;  
Tracking No. 12453232; RN101927010/CN600129530**

Dear Mr. Prompungorn:

On behalf of the Royal Oaks Landfill, this letter is written to provide responses to comments contained in a letter dated October 20, 2008, from the Texas Commission on Environmental Quality (TCEQ). The letter requested that the comments be addressed within 30 days (November 19, 2008). The TCEQ comments are provided below in italics with our response immediately following.

Comment 1: *In response to Comment No. 1 of the second NOD, Figure 4-4 of Attachment 5 is provided to depict a cross-section along the eastern boundary, passing through monitoring well (MW) MW-20 and MW-21. The cross-section shows the existing ground elevation drops to the lowest elevation from 665 feet above mean sea level (msl) to 585 feet msl (approximately 80 feet drop from MW-21 toward MW-20 or 340 feet northerly from MW-21 along the point of compliance (POC)). The lowest elevation (at 585 feet msl) is approximately 20 feet below the bottom of Aquifer B. To get a clear picture to evaluate the proposed 749 feet between MW-21 and MW-20, please provide contour maps for existing contour and final contour showing elevations of areas within this vicinity (to cover approximately 500 feet west of the POC and 200 feet east of the POC).*

Response: Per your request, drawings illustrating the existing contours and final contours are provided in Attachment 2. The existing contours are illustrated on a revised version of Figure 4-3 of the well spacing permit modification titled Proposed Groundwater Monitoring System, and the final contours are provided on the 1995 Landfill Completion Plan, Part III, Attachment 1, Sheet 1.2, by HMA Environmental. Figure 4-3 has been modified to include two-foot contour intervals and have the same scale

and orientation as the Landfill Completion Plan. The Landfill Completion Plan has been modified to include the locations of MW-20 and MW-21.

Comment 2: *Your response to Comment No. 2 of the second NOD states that our recommendation to install an additional well between MW-15 and MW-23 is not necessary because these two wells are within 600 feet apart. This is correct; however, these two wells are screened to monitor Aquifer B whereas the requested well will be used to monitor Aquifer A. We recommend an additional groundwater detection monitoring well at approximately 300 feet south of MW-14.*

Response: As stated in a previous response, the site operator believes 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. However, we cannot verify the design or construction of the adjacent City of Jacksonville Landfill at this time. As a result, a new well, MW-25, is proposed for installation at a location approximately 300 feet south of MW-14. Revised figures are attached.

Comment 3: *The last paragraph on Page Att 5-14 indicates that the newly proposed monitor wells will be installed within one year of the approval date of this permit modification request or more (MW-20). We recommend revising this paragraph to indicate that these newly proposed monitor wells will be installed within 180 days of the approval date of this permit modification request. Please revise the mentioned paragraph as recommended.*

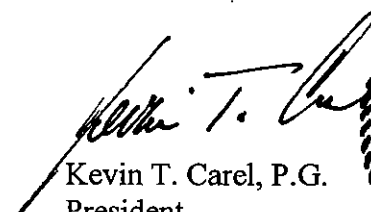
Response: The requested change has been made and revised pages are attached.

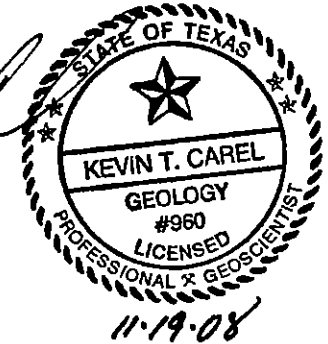
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We trust this information meets your approval. Please call if you have any questions.

Sincerely,  
THE CAREL CORPORATION

John Zhu, Ph.D.  
Hydrogeologist

  
Kevin T. Carel, P.G.  
President



Att:

Attachment 1 – TCEQ Part 1 Application Page 1 and Signature Page  
Attachment 2 – Requested Contour Maps  
Attachment 3 – Attachment 4 (Underlined/Strikeout Replacement Pages)  
Attachment 4 – Attachment 4 (Clean Replacement Pages)  
Attachment 5 – Attachment 5 (Underlined/Strikeout Replacement Pages)  
Attachment 6 – 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

## **ATTACHMENT 1**

**TCEQ Part 1 Application Page 1 and Signature Page**

