



May 19, 2010
Project No. 10-04-48

Arten J. Avakian
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; Regarding the Groundwater Sampling and Analysis Plan Permit Modification, Dated April 19, 2010, BFI-Sunset Farms Landfill, MSW Permit No. 1447, Travis County, Texas; Tracking No. 12962481 and 13034095; RN100542752/CN603341421

Dear Mr. Avakian:

This letter is written on behalf of the BFI-Sunset Farms Landfill in response to a Texas Commission on Environmental Quality (TCEQ) correspondence letter dated April 19, 2010, regarding the Groundwater Sampling and Analysis Plan (GWSAP) Permit Modification. The letter requested that the TCEQ comment be addressed within 30 days (May 19, 2010). The TCEQ's comment is provided below in italics and our response immediately follows.

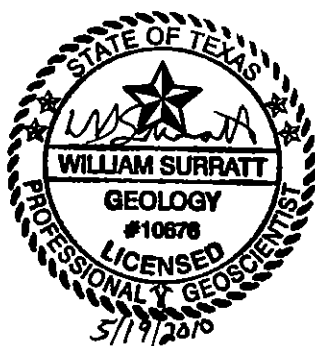
Comment 1: *Please revise the procedures in Section 2.3.5 (Purge Water Management) to clarify that purged groundwater (and excess sample water) will not be discharged to the ground surface. Purged groundwater (and excess sample water) may be discharged to the ground surface away from the wellhead area, but only after analytical results for samples of the groundwater have been received, and only if the results demonstrate that it is not contaminated. Groundwater is considered contaminated if the concentration of any constituent of concern is greater than the background concentration. If analyses indicate the groundwater is contaminated, then the purge water (and any excess sample water) must be managed as contaminated water, and not discharged.*

Response: Section 2.3.5 has been revised with the following text. Revised pages are attached.

All purge water (and excess sample water) will initially be stored in appropriate containers for each individual monitor well and not discharged to the ground surface. Purged groundwater (and excess sample water) may be discharged to the ground surface away from the wellhead area, only after analytical results for samples of the groundwater have been

received, and only if the results demonstrate that it is not contaminated. Groundwater is considered contaminated if the concentration of any GWSAP Appendix A Table 11-1 constituent or additional 40 CFR 258 Appendix II constituent (where required) is confirmed greater than the background concentration as determined by statistical analysis conducted in accordance with this plan and 30 TAC 330. If analyses indicate the groundwater is contaminated, then the purge water (and any excess sample water) must be managed as contaminated water, and not discharged to the ground surface.

I trust that this information is acceptable to you. Please call Michael Stewart at (512) 392-9105 or me at (817) 337-0112 if you have any questions.



Sincerely,
THE CAREL CORPORATION

A handwritten signature in black ink that reads "William D. Surratt".

William D. Surratt, P.G.
Groundwater Services Manager

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

cc: TCEQ Region 11 Office
Michael Stewart – Environmental Manager, Republic Services, Inc.
Everett Moore – Sunset Farms 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:	Sunset Farms Landfill			
Physical or Street Address (if available):	9912 Giles Road			
(City) (County) (State) (Zip Code):	Austin	Travis	TX	78754
(Area Code) Telephone Number:	512-272-4327			
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 :	BFI Waste Systems of North America, Inc.			
Mailing Address:	P.O. Box 140026			
(City) (County) (State) (Zip Code):	Austin	Travis	TX	78714
(Area Code) Telephone Number:	512-272-4327			
(Area Code) FAX Number:	512-272-8004			
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 type="checkbox"/> w/Public Notice	
	<input checked="" 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, Michael Stewart
(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: *Michael Stewart*

Date: 5/14/2010

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.

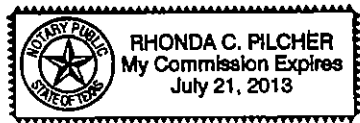
Printed or Typed Name of Operator or Principal Executive Officer

Signature

SUBSCRIBED AND SWORN to before me by the said Michael Stewart

On this 14th day of May, 2010

My commission expires on the 21st day of July, 2013



Rhonda C. Pilcher
Notary Public in and for
Hays County, Texas

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

GWSAP – Underlined/Strikeout Replacement Pages

**BFI-SUNSET FARMS LANDFILL
TRAVIS COUNTY, TEXAS
TCEQ PERMIT NO. MSW 1447-A**

PERMIT AMENDMENT APPLICATION

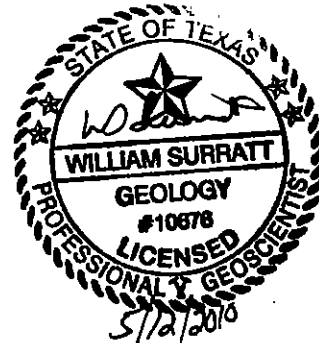
**PART III - SITE DEVELOPMENT PLAN
ATTACHMENT 11
GROUNDWATER SAMPLING AND ANALYSIS PLAN**

Prepared for

BFI Waste Systems of North America, LLC

October 2004

Revised ~~March~~ May 2010



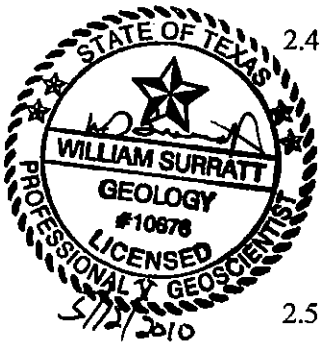
Prepared by



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

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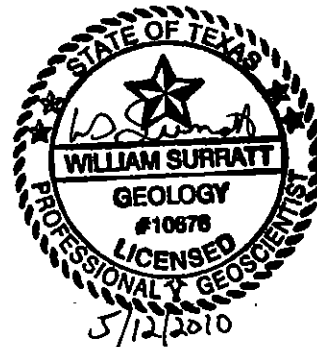
Basic Water Level Indicator Procedures 11C.1

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Statistical Analysis Plan 11E.1 – 11E.10



- Turbidity = $\pm 10\%$ for three (3) consecutive measurements unless under 10 NTU (all values under 10 NTU are considered stable).

Check water level after purge is complete.

Monitoring of temperature, pH, specific conductivity, and turbidity for stabilization will be recorded on each Field Log (see Page 11B.1).

2.3.5 Purge Water Management

All purge water (and excess sample water) ~~shall~~ will initially be stored in appropriate containers for each individual monitor well and not discharged to the ground surface. ~~Purge water known or suspected to be contaminated based on monitoring analytical data will be managed as contaminated water and disposed of accordingly.~~ Purged groundwater (and excess sample water) may be discharged to the ground surface away from the wellhead area, only after analytical results for samples of the groundwater have been received, and only if the results demonstrate that it is not contaminated. Groundwater is considered contaminated if the concentration of any GWSAP Appendix A Table 11-1 constituent or additional 40 CFR 258 Appendix II constituent (where required) is confirmed greater than the background concentration as determined by statistical analysis conducted in accordance with this plan and 30 TAC 330. If analyses indicate the groundwater is contaminated, then the purge water (and any excess sample water) must be managed as contaminated water, and not discharged to the ground surface.

2.4 Monitoring Well Sample Collection

2.4.1 General Sample Collection Information

Sampling should take place as soon as purging is complete in moderate to high yield wells. For wells purged dry, sampling will take place within 24 hours once the well has sufficient recharge, typically the following day. The time interval between the completion of well purge and sample collection normally should not exceed twenty-four hours. According to TCEQ guidelines, with prior TCEQ approval, longer times not exceeding six (6) or seven (7) days may be allowed for low-yield monitor wells before determining that a well is dry or has not recharged sufficiently to sample. If after seven (7) days a slowly recharging well has not recovered sufficiently for a complete set of samples, a partial set of samples should be collected in the order specified in the GWSAP, or in another order if warranted by conditions and data needs, until no more samples for the set can be collected.

2.4.2 Sample Collection Order

Samples will be collected and containerized according of the volatility of the requested analyses. A specific collection order is as follows:

- Volatile Organics
- Metals

2.4.3 Sampling Equipment/Procedures

Groundwater wells will be sampled using bailers, a portable submersible pump, or dedicated well pumps. These are the bailers/pumps used for well purging.

2.4.3.1 Non-Dedicated Equipment

Standard procedures for collecting representative groundwater samples after completion of purging is as follows:

- a. Remove non-dedicated purge equipment from well.
- b. Attach new string to a new disposable bailer.
- c. Insert bailer into well. Do not "drop" bailer into water column to avoid agitation of water.

Remove bailer from well and slowly pour water from bailer directly into required sample containers in accordance with the sample collection order described in Section 2.4.2. Repeat as necessary to collect sufficient sample for analysis. Ensure bailer and string do not touch the ground during sampling.

2.4.3.2 Dedicated Equipment

In the event that dedicated pumps are installed in each well, standard procedures for collecting representative groundwater samples after completion of purging is as follows:

- a. Reduce flow from pump to approximately 100 ml/minute.
- b. Sample field parameters.
- c. Sample for volatile organic compounds.
- d. Increase flow to a moderate rate (0.2 to 1.0 liters/minute).
- e. Sample metals.

2.4.4 VOC Sample Collection

Filling VOC sample containers involves extra care. The water should be gently added to each vial until a positive meniscus is formed over the top of the container. This insures no headspace is present in the sample vial upon replacing the cap. After the cap has been placed on the vial and tightened, the vial should be checked for air bubbles by turning upside down and tapping with finger. If a bubble is seen rising to the bottom of the vial,

the process outlined above should be repeated. If no air bubbles are seen in each vial, the process is complete.

2.4.5 Sample Filtration

In accordance with 30 TAC §330.405(c), groundwater samples will not be field-filtered prior to laboratory analysis.

2.4.6 Sample Preservation

All samples will be containerized and preserved according to Page 11B.2, *Recommended Sample Containerization and Preservation of Samples*. Preservation acids may be added to the applicable sample container in the field or pre-preserved to the applicable empty containers at the laboratory prior to sample collection. Methods of preservation are intended to retard biological action, retard hydrolysis of chemical compounds and complexes, and reduce the volatility of constituents.

Samples requiring refrigeration to four degrees Centigrade, according to Page 11B.2, will be accomplished by placing the sample containers immediately into coolers containing wet ice or the equivalent and delivering to the analytical laboratory as soon as practical.

2.4.7 Field Measurements

Required field measurements include water levels, temperature, pH, specific conductivity, turbidity, and biennial total depth measurement. Water level and total depth measurement procedures are described in Section 2.3.3. Temperature should be measured immediately after collection of the sample.

All instruments shall be properly calibrated and checked with standards according to the manufacturer instructions. Any improperly operating instruments must be replaced prior to continuing sample collection operations.

2.5 Record Keeping

2.5.1 Field Logs

All field notes must be completely and accurately documented. All field information will be entered on a standard BFI Field Information Log (see Page 11B.1).

An individual field log is shown on Page 11B.1. All entries should be legible and made in black, indelible ink. Entry errors will be crossed out with a single line, dated, and

initialed by the person making the corrections. Copies of field logs will be placed in the operating record for the facility.

2.5.2 Chain-of-Custody/Sample Container Labels

Proper chain of custody records are required to insure the integrity of the samples and the conditions of the samples upon receipt at the laboratory, including the temperature of the samples at the time of log-in. The sample collector shall fill in all applicable sections and forward the original, with the respective sample(s), to the laboratory performing the analysis. Upon receipt of the samples at the laboratory, the sample coordinator is to complete the chain of custody, make a copy for his/her files, and make the original documents part of the final analytical report (see Page 11B.3 as an example of chain-of-custody). Copies of the final groundwater monitoring and analytical reports will be placed in the operating record for the facility.

All sample containers will be labeled to prevent misidentification. The following will be indicated on an adhesive label with a waterproof pen:

- Collector's name, date and time of sampling.
- Sample source.
- Sample Identification number.
- Sample preservatives (if any).
- Test(s) to be performed on the sample.

2.6 Sample Transport

Samples shall be shipped from the field back to the analytical laboratory either by hand delivery or utilizing an overnight courier service. Samples are to be shipped in sealed insulated shipping containers which maintain the samples at approximately 4°C. The sample shipping container will also be sealed using a method that will reveal whether the container security has been violated or otherwise compromised before it is turned over to a common carrier or any other person that does not complete the chain-of-custody documentation. Overnight courier shipping containers must be a sturdy waterproof design (ice chests are commonly used) equipped with bottle dividers and cushion material to prevent breakage during shipment. The field crew shall contact the laboratory each time samples are sent to identify the samples being sent and the transportation carrier along with the shipping identification number.

GWSAP – Clean Replacement Pages

**BFI-SUNSET FARMS LANDFILL
TRAVIS COUNTY, TEXAS
TCEQ PERMIT NO. MSW 1447-A**

PERMIT AMENDMENT APPLICATION

**PART III - SITE DEVELOPMENT PLAN
ATTACHMENT 11
GROUNDWATER SAMPLING AND ANALYSIS PLAN**

Prepared for

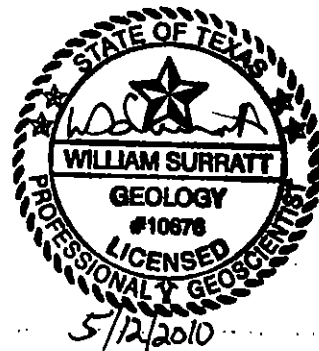
BFI Waste Systems of North America, LLC

October 2004
Revised May 2010

Prepared by

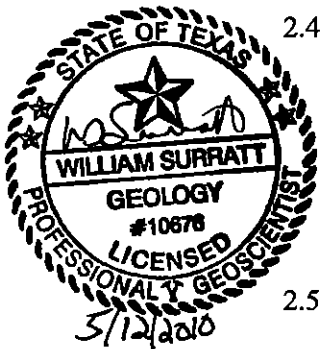


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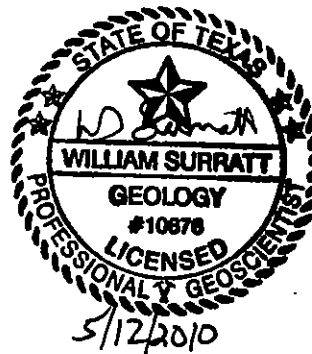
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