



WASTE MANAGEMENT

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January 13, 2009

Elizabeth Slone, Environmental Project Manager
MC-124
MSW Permits Section
Texas Commission on Environmental Quality
12015 Park 35 Circle, Bldg. F
Austin, TX 78753

**RE: USA Waste of Texas Landfills, Inc. Addicks-Fairbanks Landfill
MSW Permit No. 1301, Municipal Solid Waste – Harris County
ARTS Nos 11627245, 11697642, 11929569, 12312856;
RN101519569/CN602560930
Response to TCEQ Comment Letter Dated August 8, 2008 on the
Hydrogeologic Evaluation Report
Document # AF011309.01**

Dear Ms. Slone:

A response has been prepared to address the comments received from the Texas Commission on Environmental Quality (TCEQ) in a letter dated August 8, 2008, regarding the Hydrogeologic Evaluation Report for the USA Waste of Texas Landfills, Inc. (USA Waste) Addicks-Fairbanks Landfill in Houston, Texas. The response was prepared by Mr. Eric Matzner, a qualified groundwater scientist in accordance with 30 TAC §330.3 (120), on the behalf of USA Waste.

If you have any questions concerning this response letter, please contact me at (713) 829-6887 or Mr. Matzner at (512) 671-3434.

Sincerely,
USA Waste of Texas Landfills, Inc.

A handwritten signature in black ink that reads "James R. Scheline". The signature is written in a cursive style with a long, sweeping underline.

James R. Scheline
Division Environmental Protection Manager

cc: TCEQ - Region 12

From everyday collection to environmental protection, Think Green: Think Waste Management.

Addicks-Fairbanks Landfill – MSW Permit No: 1301, Harris County, Texas
ARTS Nos. 11627245, 11697642, 11929569, 12312856; RN101519569 / CN602560930
Response to August 8, 2008 TCEQ Comment Letter on the Hydrogeologic Evaluation Report

Pastor, Behling & Wheeler, LLC (PBW) has prepared the following responses to the Texas Commission on Environmental Quality (TCEQ) comments in a letter dated August 8, 2008 regarding the Hydrogeologic Evaluation Report for the Addicks-Fairbanks Landfill and subsequent TCEQ comments regarding the Report. PBW prepared the response to the TCEQ comments identified below which are referenced from the August 8, 2008 letter.

TCEQ Comment No. 1:

It appears that moist to wet sediment above a depth of 35 feet below ground surface (bgs) is described in some of the boring logs (TGP-1A, TGP-1B, GP-9, B-5, and MW-5) on the west side of the facility near Horsepen Creek. The Hydrogeologic Evaluation Report recommends installing a replacement well for MW-5 approximately 20 to 30 feet deeper than the current well (bottom cap at a depth of 98.5 feet) and also suggests the installation of a well, completed to a similar depth as the replacement well for MW-5, near soil boring GP-9. The waste excavation, as determined from the geologic cross sections in the report, extends between approximately 38 to 42 feet bgs. If water is available for sampling near the base of Stratum II, we request screening these two downgradient wells at a more shallow depth and closer to the base of the estimated waste excavation depth in order to better monitor any release from the facility.

Response:

Based on the current groundwater data collected from the monitoring system, we respectfully maintain that the installation of two new wells at depths appropriate to penetrate the groundwater-bearing unit observed in Stratum IV is appropriate and consistent with the TCEQ Municipal Solid Waste (MSW) Rules. At this time there does not appear to be enough data, as required by 30 TAC §330.403(a), to define a “moist to wet zone” as satisfying the definition of uppermost aquifer as defined under §330.3 to warrant inclusion of this zone in the groundwater monitoring network. Stratum IV has been characterized and approved by TCEQ to represent the uppermost aquifer and the proposed well installation modifications originally submitted in 2007 and certified by a qualified groundwater scientist is adequate to meet the regulatory objective to detect a release from the landfill to the uppermost aquifer.

TCEQ Comment No. 2:

It states in the Hydrogeologic Evaluation Report that MW-2A appears to be screened in an isolated perched zone of Stratum IV. The boring logs and cross-sections provided in the report, however, do not seem to support this conclusion and MW-2A appears to be screened in a more shallow location within Stratum IV rather than a perched zone. We are therefore requesting that MW-2A remain on the facility's groundwater monitoring network as an upgradient well.

Response:

Monitoring well MW-2A will remain part of the groundwater monitoring network.

TCEQ Comment No. 3:

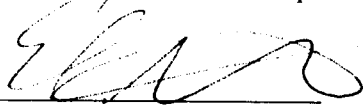
Please identify any areas of the facility where standing water can be found in open excavations.

Response:

The USA Waste of Texas Landfills, Inc. site manager for the Addicks-Fairbanks facility was contacted for information regarding standing water present in excavations at the site. According to the site manager, excavated areas of the landfill contain stormwater with an average depth of approximately three feet. The stormwater is periodically removed from the excavations.

If you have any questions or comments concerning responses to the TCEQ comments, please do not hesitate to contact me at 512-671-3434. I (Eric C. Matzner, P.G.) certify that this document was prepared under my direct supervision and that I meet the definition of a qualified groundwater scientist in accordance with 30 TAC §330.3(120) which states:

Qualified groundwater scientist - scientist or engineer who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and has sufficient training and experience in groundwater hydrology and related fields as may be demonstrated by state registration, professional certifications, or completion of accredited university courses that enable that individual to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport.



Eric C. Matzner, P.G.
Senior Hydrogeologist

01/09/09
Date

