



BIGGS & MATHEWS ENVIRONMENTAL

Consulting Engineers ♦ Hydrogeologists

Mansfield ♦ Wichita Falls

October 18, 2016

Garrett Heathman
Project Manager, Municipal Solid Waste Permits Section
MC-124
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: Skyline Landfill
Dallas and Ellis Counties, Texas
TCEQ Permit No. MSW 42D
Permit Modification – Use of Posi-Shell Base Mix and Quick Cover Alternate Daily Cover
as Alternative Daily Cover Material
Response to Comments/Tracking No. 20885505
RN 100542232; CN 603572132

Dear Mr. Heathman:

On behalf of Waste Management of Texas, Inc., enclosed is a response to comments received on October 17, 2016 for the referenced permit modification for the Skyline Landfill, TCEQ Permit No. MSW 42D. This permit modification has been prepared consistent with Title 30 of the Texas Administrative Code (TAC) §305.70(k)(1). The proposed permit modification includes a revision to the Site Operating Plan for the use of an alternative daily cover material on a permanent basis.

One original and two copies of the revisions to the proposed permit modification are provided for your review and comment. Revisions have been highlighted and the revision number and date are noted on each page revised. A copy of this submittal has been sent to the TCEQ Region 4 Office. A copy of this submittal was placed in the site operating record for this facility.

We believe the enclosed response to comments to be consistent with the requirements of the Texas Commission on Environmental Quality. Please call or e-mail me if you have any questions at 817-563-1144 or kwelch@biggsandmathews.com.

Sincerely,

BIGGS & MATHEWS ENVIRONMENTAL
TBPE No. F-256 ♦ TBPG No. 50222

A handwritten signature in blue ink that reads 'Kenneth J. Welch'.

Kenneth J. Welch, P.E.
Principal Engineer

Attachments: Permit Modification – Response to Comments (page IVF-4)

cc: Ms. Paula Carboni, Waste Management of Texas, Inc. (1)
Mr. Tony Walker, TCEQ Region 4 (1)

3 OPERATIONAL METHODS

This section discusses the operational procedures that will be used to employ the proposed ADC materials. For each type of ADC, landfill personnel will verify that the waste fill area has been covered with the minimum required thickness at the completion of each working day.

Contaminated Soils

- Contaminated soil may be stockpiled near the working face and spread over waste with a dozer or similar equipment to a minimum thickness of 6 inches. Clean soil may be added as necessary to obtain the appropriate thickness.
- The contaminated soil will be placed in one lift, with a minimum thickness of 6 inches, and placed consistent with procedures for placement of daily cover in accordance with Part IV – SOP, Section 8.18.2 – Daily Cover.
- The contaminated soil will be used as alternative daily cover within fifteen days of receipt. The contaminated soil will be located within the working face run-off control berms that provide for control of contaminated water and discharge of soils.
- Surface water that comes into contact with the contaminated soil will be treated as contaminated water and disposed of in accordance with Part III, Attachment D6, Section 3.

Posi-Shell material will be deployed as follows:

- The Posi-Shell material will be prepared as specified by the manufacturer.
- The slurry will be sprayed over the active working face by a hydroseeder.
- The slurry will be applied at a thickness so that no waste is visible following its application.
- The slurry will be applied from at least two directions and will achieve a minimum of 0.25 inches over the exposed waste.

Quick Cover material will be deployed as follows:

- The Quick Cover material will be prepared as specified by the manufacturer.
- The slurry will be sprayed over the active working face by a hydroseeder.
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