

RESPONSE 66

1.0 INTRODUCTION

On October 9, 1993, the State of Texas promulgated regulations governing all aspects of municipal solid waste management (30 Texas Administrative Code, Chapter 330). On March 27, 2006 the State of Texas revised the 30 TAC §330 regulations. In accordance with 30 TAC §330.401(f), groundwater monitoring must be conducted throughout the active life and any required post-closure care period. In accordance with 30 TAC §330.403(d), all parts of the groundwater monitoring system shall be operated and maintained so that they perform at least to design specifications. In accordance with 30 TAC §330.403(e)(3), the executive director and others shall be notified of any changes in facility construction or operation that affect or are likely to affect direction and rate of groundwater flow, and the potential for detecting contaminants from the waste management unit. Subchapter J, §330.405(b) requires that owners or operators of Municipal Solid Waste Landfills (MSWLFs) prepare and submit a Groundwater Sampling and Analysis Plan (GWSAP) to the Texas Commission on Environmental Quality (TCEQ) executive director for review and approval prior to commencement of sampling. Waste Management of Texas, Inc. (WMTX) shall maintain a current copy of the GWSAP in the Site Operating Records (SOR). The purpose of this document is to satisfy the requirements of these regulations as they pertain to the Temple Recycling and Disposal Facility (RDF).

5.0 DETECTION MONITORING

The Detection Monitoring Program is summarized on Figure 5-1 and discussed in the following subsections.

5.1 Groundwater Detection Monitoring Parameters

Parameters that will be monitored during Detection Monitoring consist of inorganic and organic constituents found in 40 Code of Federal Regulations (CFR) Part 258, Appendix I. The detection monitoring list has been included as Table 5-1, which was compiled pursuant to 30 TAC §330.419(a). In addition to the constituents found in 40 CFR Part 258, Appendix I, other groundwater quality indicator parameters (i.e. calcium, chloride) may be collected and analyzed as part of a Detection Monitoring event but will not be evaluated in accordance with the statistical methods described in Section 5.4.

5.2 Groundwater Detection Monitoring Frequency

After the establishment of background groundwater quality (refer to Section 4.0), the detection monitoring frequency for all constituents previously identified in Section 5.1 will be semi-annual during the active life, closure, and post-closure care periods of the site and as required in accordance with §330.407(a)(2).

5.3 Reporting Requirements - §330.407(b) and (c)

Not later than 60 days after each sampling event, WMTX shall determine whether there has been a statistically significant increase (SSI) over background of any tested constituent at any monitoring well. In accordance with the statistical procedures outlined by Dr. Robert Gibbons for this site and supported by ASTM D6312-98, an increase is not statistically significant unless it has been verified (see Section 5.4.1). If a single detection without the use of verification re-sampling is used as a trigger for SSI, much higher control limits would be required to maintain the performance standards prescribed by USEPA for multiple statistical comparisons. If there has been a SSI, WMTX shall notify the TCEQ, and any local pollution agency with jurisdiction that has requested to be notified, in writing within 14 days of this determination.

If a SSI over background of any tested constituent at any monitoring well has occurred, WMTX shall immediately place a notice in the operating record describing the increase and