

**RESPONSE 112**

LFG monitoring for the presence of methane gas at the site will be conducted on a regular basis. In particular, the site boundary will be monitored to identify whether there exists the possibility of off-site methane migration or perimeter methane concentrations exceeding ~~the lower explosive limit (LEL) five percent by volume.~~ 1.25 percent by volume. Additionally, on-site structures will be checked to confirm that methane concentrations do not exceed ~~25 percent of the LEL~~ 1.25 percent by volume. The allowable limits and details of gas monitoring and recovery are more fully described in Part III, Attachment 6, Landfill Gas Management Plan.

Monitoring for combustible gas concentrations will be performed quarterly within all enclosed site structures and around the perimeter of landfilled portions of the site. All required reports and other submittals shall be included in the SOR. Permanent probes will be used to monitor the perimeter. Barhole probes may be used as a supplement. Probe locations are specified in Part III, Attachment 6, Landfill Gas Management Plan.

In the event that methane levels that exceed allowable lower limits are detected within structures or at the property boundary, the TCEQ will be notified and steps will be implemented to ensure the protection of human health in accordance with the Landfill Gas Management Contingency Plan. Documentation of the gas measurements and of the steps taken for human protection will be placed in the SOR within 7 days. A remediation plan for any methane gas releases, as described in the LGMP, will be implemented within 60 days of the methane detection. This remediation plan will be submitted to TCEQ to describe the proposed remediation activities within 60 days.

#### **4.20 Oil, Gas, and Water Wells §330.161**

There are no known existing or abandoned oil or gas wells within the site. There are two known water wells on the east portion of the site. These will be abandoned, as described in the Geology Report and in accordance with appropriate regulatory guidance after issuance of MSW Permit No. 692B. No water wells will remain operational for water supply at the site.

~~The LM or designated alternate shall immediately provide written notification to the TCEQ of the location of any and anyall other existing or abandoned water wells situated within the facility upon discovery during the course of facility development oil or gas wells or other wells associated with mineral recovery or water wells situated within the site upon such discovery.~~ The LM or designated alternate shall, within 30 days of such a discovery, provide the TCEQ with written certification that all abandoned water wells have been capped, plugged, and closed in accordance with all applicable rules and regulations of the TCEQ. ~~The LM or designated alternate shall provide the TCEQ with written certification that all abandoned oil or gas wells or other wells associated with mineral recovery have been capped, plugged, and closed in accordance with all applicable rules of the Railroad Commission of Texas.~~

If any water or other type of well under the jurisdiction of the TCEQ is to be plugged, it shall be plugged in accordance with all applicable TCEQ requirements and any additional requirements imposed by the TCEQ ED. A copy of the well plugging report required to be submitted to the appropriate state agency shall also be submitted to the TCEQ ED within 30 days after the well has been plugged.

The LM or designated alternate shall provide written notification to the TCEQ of the location of any and all existing or abandoned on-site crude oil or natural gas wells, or other wells associated with mineral recovery that are under the jurisdiction of the Railroad Commission of Texas. The LM or designated alternate shall provide the TCEQ with written notification of the location of any such well within 30 days after discovery during the course of facility development. Within 30 days after plugging of any such well, the LM or designated alternate shall provide the TCEQ with written certification that these wells have been properly capped, plugged, and closed in accordance with all applicable rules and regulations of the Railroad Commission of Texas. Producing crude oil or natural gas wells that do not affect or hamper landfill operations may be operated within the facility boundary, if identified in the permit for the facility or in a written notification to the TCEQ.

A permit modification will be submitted to the TCEQ identifying any proposed changes to the liner installation plan as a result of any well abandonment.

#### **4.21 Compaction §330.163**

The waste shall be thoroughly compacted by landfill compaction equipment. The compaction equipment shall pass over the waste a sufficient number of times to achieve thorough compaction.

When waste is used as ballast, as described in Part III, Attachment 3, Appendix III-3F, Liner Quality Control Plan, the first 5 feet or the total thickness of ballast, whichever is less, placed on the liner system shall be free of brush and large bulky items that would damage the underlying parts of the liner system or that cannot be compacted to the required density. When waste is used as ballast, a wheeled trash compactor having a minimum weight of 40,000 pounds, or similar equipment shall be used for compaction of waste. . For additional information, see Appendix III-3F, Liner Quality Control Plan.

#### **4.22 Landfill Cover §330.165**

##### **4.22.1 Daily Cover**

To prevent disease vectors, control windblown debris and odors, reduce the possibility of fire, prevent scavenging, and improve the operation of the site, a minimum of 6 inches of "daily" cover (earthen material that has not been previously mixed with garbage, rubbish, or other solid waste), or approved equivalent, shall be placed and compacted in the case of soil over all exposed waste at the end of each operating day.