January 11, 2018 Project No. 1401491

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

ATTN: Frank Zeng, Project Manager

RE: RESPONSE TO TCEQ NOTICE OF DEFICIENCY
PERMIT AMENDMENT APPLICATION – PERMIT MSW-956C
EDINBURG REGIONAL DISPOSAL FACILITY
EDINBURG, HIDALGO COUNTY, TEXAS
TRACKING NO. 21832886; CN600647978/RN102217734

Dear Mr. Zeng:

On behalf of the City of Edinburg, Golder Associates Inc. (Golder) submits this response to the Texas Commission on Environmental Quality's (TCEQ's) Notice of Deficiency (NOD) regarding the above-referenced Permit Amendment Application (PAA). TCEQ's NOD letter was dated on December 14, 2017.

The responses presented herein are cross-referenced to the NOD comments using the comment numbers in the NOD and quoting the original comments. We have also included an itemized list of the revised or new PAA pages.

One original and three (3) copies of the revised PAA materials and one (1) copy of the redline-strikeout revisions are included with this letter. This response package will be posted to a publicly accessible website as indicated in the Part I form of the PAA.

We trust this response is sufficient to address the deficiencies identified by the TCEQ. Upon review of this response, if you have questions, please contact the undersigned at 281-821-6868.

GOLDER ASSOCIATES INC.

Chad E. Ireland, PE
Senior Project Geological Engineer

Charlie Dominguez, PE
Principal and VP, Central Region

cc: Mr. Ramiro Gomez, Jr., Director of Solid Waste Management
Jaime A. Garza, Regional Director, TCEQ Region 15 Office

CEI/CGD/kc

Golder Associates Inc.
500 Century Plaza Drive, Suite 190
Houston, TX 77073 USA
Tel: (281) 821-6868 Fax: (281) 821-6870 www.golder.com

PERMIT AMENDMENT APPLICATION REVISIONS

Application Part Revisions		Figure Revisions	
■ II §2.10.2	■ ~~IV §4.6.1.5~~	■ II-16	■ III3B-3A-2
■ II §3.1.2.2	■ IV §4.18	■ II-18A	■ III3B-3A-3
■ II §3.3.1	■ IV §4.2.2.4	■ II-18B	■ III3B-3B-1
■ II §3.4.1	■ IV §4.22.3.4.2	■ II-19	■ III3B-3C-1
■ IIE2-4	■ IV §4.26	■ II-20A	■ III3B-3C-2
■ III1 §1.2.2	■ IV §4.29	■ II-20B	■ III3D-1-1
■ III1 §1.2.4.1	■ IV §4.29.1	■ II-20C	■ III3E-1-1
■ III1 §1.2.4.2	■ IV §4.29.2	■ II-20D1	■ III3E-1-2
■ III1 §1.2.4.3	■ IV §4.29.3	■ II-20D2	■ III3E-2A-1
■ ~~III2 §7.0~~	■ IV §4.29.4	■ II-20E	■ III3F-3A
■ III2A	■ ~~IV §4.30~~	■ III1-1	■ III3F-3B
■ ~~III2F~~	■ IV §4.31→ IV §4.30	■ III1-2	■ III6-1
■ III2G→ III2F	■ IV §4.30	■ III2-2	■ III6-2
■ III2F	■ Table IV-7	■ III2-6	■ III6-3
■ Table III2-3	■ IVG §1.0	■ III2-7	■ III6-4
■ Table III2-4	■ IVI §1.0	■ III2-8	■ III6-5
■ Table III2A-2A	■ IVI §1.1	■ III2A-2	■ III6-6
■ Table III2A-2B	■ IVI §1.4	■ III3-2A	■ ~~III6-7~~
■ Table III2A-2C	■ IVI §2.3	■ III3-2B	■ III7-1
■ Table III2A-2D	■ IVI §2.4→ IVI §2.5	■ III3-3	■ III7-2A
■ III3 §1.3	■ IVI §2.5	■ III3-4A	■ III7-2B
■ III3 §1.4	■ IVI §2.6	■ III3-4B	■ III7-2C
■ III3 §2.1	■ IVI §2.7	■ III3-4C	■ III7-2D
■ III3 §4.0	■ IVI §2.8	■ III3-4D	■ III7-2E
■ III3A-1		■ III3-4E	■ III7-3A
■ III3A-1 §5.2.2		■ III3-5A	■ III7-3B
■ III3A-2		■ III3-5B	■ ~~III7-3C~~
■ ~~III6 §3.2.4~~		■ III3-6A	■ III7-4
■ ~~III7 §1.2.3~~		■ III3-6B	■ III7D-1-1→ III7C-1
■ III7 §3.0		■ III3-8	■ III7D-1-2→ III7C-2
■ ~~III7B~~		■ III3A-1-1	■ IVI-1
■ III7C §5.1.2		■ III3A-1-2	
■ III7C→ III7B		■ III3A-1-3	
■ III7D-1→ III7C		■ III3A-1-4	
■ ~~III7D-2~~		■ ~~III3A-1-5~~	
■ III8 §1.2		■ III3B-1-1	
■ III8 §1.2.4		■ III3B-1-2	
■ III9 §ES		■ III3B-2A-1	
■ III9 §1.1.2		■ III3B-2C-1	
■ III9 §2.1.2		■ III3B-2D-1	
■ III9A		■ III3B-2D-2	
■ III9B		■ III3B-3A-1	

RESPONSE TO LETTER NOTICE OF DEFICIENCY COMMENTS

Comments and Reponses		Revisions
1	*(In response to Comment 42) Please note that soil contaminated with TPH in concentration exceeding 1,500 mg/kg is Class 1 industrial waste (or Class 1 like); and this application does not seek authorization for accepting Class 1 waste. To comply with §330.165(d)(5), please revise Section 4.22.3.4.2 of the SOP to remove the language of possible use of soil contaminated with TPH in concentration exceeding 1,500 mg/kg as an alternative daily cover.*	Part IV §4.22.3.4.2
	Part IV §4.22.3.4.2, Total Petroleum Hydrocarbons references have been revised to remove the language of possible use of soil contaminated with TPH in concentration exceeding 1,500 mg/kg as an alternative daily cover to comply with 30 TAC §330.165(d)(5) as requested because the application does not seek authorization for accepting Class I waste.	
2	*(In response to Comment 44) The following comments need revisions to the application as necessary.*	
a	*Appendix IVI does not include measures for air protection and odor control in accordance with §330.149 and §330.245.*	Part IVI §2.6
	Part IVI §2.6, Odor Management has been added to include measures for air protection and odor control in accordance with applicable requirements of 30 TAC §§330.149 and 330.245.	
b	*Appendix IVI does not include fire protection measures in accordance with §330.221.*	Part IVI §2.7
	Part IVI §2.7, Fire Protection has been added referencing fire protection standards and training procedures outlined in Part IV §4.4, Fire Protection Plan.	
c	*Section 1.4, Decommissioning, of Appendix IVI needs to discuss how the remaining wastes and stabilizing/bulking materials will be removed and properly disposed. Please revise this section to discuss how the surface area of the solidification will be restored/graded/covered to the surrounding surfaces.*	Part IVI §1.4
	Because metal basins are located within a constructed waste disposal unit constructed in accordance with 30 TAC §330.331(b), Part IVI §1.4, Decommissioning has been revised to state if the metal basin is not repaired and instead is decommissioned, the City will either repurpose the metal basin for beneficial use, dispose of it at the active working face, or place it back into existing pit to be filled with any remaining solidified/stabilized wastes and stabilizing/bulking materials, waste approved for acceptance at facility, or soil to a grade matching the surrounding waste surface.	
d	*Appendix IVI does not include plans and cross-sections of the liquid waste solidification/stabilization facility in accordance with §§330.63(c)(1)(B), 330.63(d)(3)(A), 330.63(d)(4)(E), and 330.63(h). The plans and cross sections should show the spill/runoff control berm. Please specify the maximum number of basins to be installed at the solidification facility. Also, in accordance with §330.227, revise Appendix IVI to include design and drawings for a spill/precipitation runoff containment berm with appropriate material and construction; include measures for the management of the contained spills or contaminated runoff. Note contained liquids must be removed in a timely manner.*	Parts IVI §1.0 IVI §2.8 Figure IVI-1
	Figure IVI-1, Solidification/Stabilization Area Layout has been added to depict a plan and a cross-section of the liquid waste solidification/stabilization area showing the runoff/run-on control berms constructed of compacted earthen material. Part IVI §1.0, Processing Basins has been revised to include a	

	maximum number of ten basins. Part IVI §2.8, Contaminated Water has been added to address contained spills and contaminated runoff.	
e	*Attachment 9 does not include the costs related to closing the liquid waste solidification/stabilization facility. Please explain why no costs were included.*	Part III9A
	Part III9A, TCEQ Closure Cost Estimate has been revised by including closure costs for solidification/stabilization of the maximum acceptance daily rate of liquid waste, 50 tons, and disposal and decommissioning of liquid waste solidification/stabilization area including the maximum number of 10 basins, assume fill basins in place, to Form Item Nos. 3.1 and 3.3, respectively.	
3	*(In response to Comment 45) Explain how the gas condensate will "flow" into the leachate collection and removal system and revise Section 4.29.2 as necessary. Please note that this application does not propose recirculation of collected leachate and gas condensate into the buried waste.*	Parts IV §4.29.2 IV §4.29.3
	Part IV §4.29.2, Leachate has been revised and Part IV §4.29.3, Gas Condensate created to include language that gas condensate will be pumped directly into either the leachate collection and removal system or the leachate force main connected to a public sewer system in accordance with Part III3, Waste Management Unit Design.	
4	*(In response to Comment 46) Revise Attachment 8 (Post-closure Care Plan) to be specific on how the collected leachate will be disposed of. Please revise Attachment 9 (Closure and Post-closure Cost Estimates) to include the costs associated with leachate disposal during the post-closure care period or explain why the specified leachate disposal method will not incur any cost. (If the requested information is already included in the application, please identify the location(s)).*	Parts III3 §4.0 III8 §1.2.4 III9B
	Part III8 §1.2.4, Leachate Collection and Removal System has been revised to reference Part III §4.0, Leachate Collection and Removal System and language has been added "Leachate will be collected, removed, and disposed into the public sewer system owned and operated by the City." Part III3 §4.0 has been revised to include language discharge to the public sewer system "owned and operated by the City, Permit WQ0010503002". Part III9B, Post-closure Care Cost Estimates has been revised to include leachate disposal costs in Item No. 3.2. According to Part III3D-1, HELP Model Evaluation the average annual leachate generation for a 30 year simulation period of final condition with final cover installed is 0 cf/acre. To be conservative, the average annual leachate generation of 8 cf/acre for the final condition with no final cover installed was used to estimate leachate disposal quantities. Unit costs for leachate disposal estimated using Edinburg Code of Ordinances §52.28, User Charge System.	
5	*(In response to Comment 48) Please explain how applicable requirements of §330.207(g) regarding effluent limitations will be satisfied and revise the application as necessary.*	Part IV §4.29
	Part IV §4.29, Contaminated Water Management has been revised to include effluent limitation requirements of 30 TAC §330.207(g) for wastewater discharged to a treatment facility.	
6	*(In response to Comment 50) Please note that the original comment was specifically regarding the "rules" for use of the Citizen's Collection Station required by §330.213(a). Rule §330.213(a) (Citizen's Collection Stations) states, "Rules shall be posted governing the use of the facility to include who may use it, what may or may not be deposited, etc." The response states that "the rules are displayed at the site entrance." Please revise the application as previously commented. (Please disregard this comment if the citizen's collection is removed from this application in response to the informal comment related to Response to Comment 8 of the September 18, 2017 NOD letter).*	
	Part IV §4.30, Citizen's Collection has been removed in response to Comment 8b. No revisions have been made in response to this comment.	

7	*(In response to Comment 52) In accordance with §330.171(c)(3)(A), an alternative compliance mechanism for a RACM disposal area is not allowed; please revise Appendix IVG of the SOP to comply with §330.171(c)(3)(A) and (B). Please ensure that the designated RACM area is surveyed and marked accordingly.*	Part IVG §1.0
	Part IVG §1.0, Authorization has been revised to comply with 30 TAC §330.171(c)(3)(A) and (B).	
8	*(In response to Comments 5 and 8) The following comments need revisions to the application as necessary.*	
a	*Revise (figures and text) to show access control fence and gate along facility boundary as required in §330.63(b)(1), §330.131, and §330.143(b)(2).*	Figure II-16
	Part II §3.3.2, Part III1 §1.1, and Part IV §4.5 describe access to the facility is controlled by a perimeter fence currently installed around contiguous properties owned by the City. The perimeter fence encompasses the facility permit boundary as well as the Type IV Landfill TCEQ Permit MSW-2302, landfill facilities to the south, and additional City owned properties to the east as depicted on Figure II-16, Facility Entrance Plan. 30 TAC §§330.63(b)(1), 330.131, and 330.143(b)(2) do not require access control fencing and gates to be located along facility boundary; but rather access to facility be controlled by means of artificial barriers, natural barriers, or a combination of both. No text revisions have been made in response to this comment. Figure II-16 has been revised to call out location of access gate at the facility entrance.	
b	*Figure II-16 (and other plans) indicates the proposed processing/storage area (i.e. Designated Area for Citizen Collection, Reusable Material Staging, Large Item Storage, and White Goods) is located within MSW 2302 permit boundary. Please either revise the permit boundary to include the processing/storage area or remove the processing/storage area from this application and revise MSW Permit 2302 to authorize the processing/storage area. If MSW Permit 2302 is revised to include the processing/storage area, the measures related to waste acceptance under MSW Permit 956C may need to be revised to address acceptance of wastes from the processing/storage area.*	Parts II §3.3.1 III1 §1.2.2 III1 §1.2.4.1 III1 §1.2.4.2 III1 §1.2.4.3 ~~IV §4.6.1.5~~ ~~IV §4.30~~ Figures III1-1 III1-2 II-16 Table IV-7
	The City shall either amend Type IV Landfill TCEQ Permit MSW-2302 by means of a non-notice permit modification to include a fenced area designated for a citizen collection and processing / storage area or submit to the TCEQ a Notice of Intent to Operate a Citizens' Collection Station and Storage/Processing Area on City-owned property outside the permit boundary of TCEQ Permit MSW-956C. Figures II-16 Facility Entrance Plan and III1-2 Schematic View of Various Waste Disposal, Processing, and Storage Areas have been revised removing designated area for citizen collection, reusable material staging, large item storage, and white goods from the Type IV Landfill TCEQ Permit MSW-2302. Figure III1-1, Waste Flow Movement Diagram has been revised by routing citizen load to working face or off-site designated citizen collection area. Part III1 §1.2.2. Schematic View Drawings has been revised by removing citizen collection station from the permit boundary of Type IV Landfill TCEQ Permit MSW-2302; reusable material staging area, large item salvage and white goods storage area, and whole tire storage area may be provided near the active working face. Parts III1 §1.2.4.1, III1 §1.2.4.2, and III1 §1.2.4.3 has been revised removing citizen collection.	

	Part II §3.3.1 Facility Building has been revised to exclude citizen collection, reusable material staging area and large item salvage and white goods storage area. Table IV-7: Unloading Areas and Maximum Size has been revised to remove designated area for citizen collection station. Part IV §4.6.1.5 Citizens Collection and Part IV §4.30 Citizen's Collection has been removed.	
9	*(In response to Comment 32) Section 1.2 on page III8-1 includes discussions that indicate a five-year post-closure care period; Section 1.1 on the same page specifies a 30-year post-closure care period consistent with §330.463(b). Please revise Section 1.0, Post-closure Care Requirements, to ensure compliance with all requirements of §330.463(b) and removal of any contents that are inconsistent.*	Part III8 §1.2
	Part III8 §1.2, Inspection Activities and Correction of Problems has be revised to remove reference to 30 TAC §330.463(a)(1).	

RESPONSE TO INFORMAL NOTICE OF DEFICIENCY COMMENTS

Comments and Reponses		Revisions
1	*(Regarding response to Comment 13 of the September 18, 2017 NOD letter) ClosureTurf or similar system as alternative final cover for landfills is not an approved final cover in Texas. Please revise the application as originally commented.*	
	ClosureTurf or similar system as alternative final cover has been removed from application including Part III2 §7.0, Part III2F, Part III6 §3.2.4, Part III7 §1.2.3, Part III7B, Part III7D-2, Figure III3A-1-5, Figure III6-7, and Figure III7-3C The following has been revised by removal of ClosureTurf or similar system: Part III7C retitled to Part III7B, Part III7D-1 retitled to Part III7C, Part III2G retitled to Part III2F, Figure III7D-1-1 retitled to Figure III7C-1, Figure III7D-1-2 retitled to Figure III7C-2, Figures III3A-1-1 to III3A-1-4, Figures III6-1 to III6-6, Figure III7-1, Figures III7-2A to III7-2E, Figures III7-3A and III7-3B, and Figure III7-4.	Parts ~~III2 §7.0~~ ~~III2F~~ ~~III6 §3.2.4~~ ~~III7 §1.2.3~~ ~~III7B~~ ~~III7D-2~~ III7C→ III7B III7D-1→ III7C III2G→ III2F III3 §1.4 III3A-1 III3A-2 III7 §3.0 Figures ~~III3A-1-5~~ ~~III6-7~~ ~~III7-3C~~ III7D-1-1→ III7C-1 III7D-1-2→ III7C-2 III3A-1-1 III3A-1-2 III3A-1-3 III3A-1-4 III6-1 III6-2 III6-3 III6-4 III6-5 III6-6 III7-1 III7-2A III7-2B III7-2C III7-2D III7-2E III7-3A III7-3B III7-4
2	*(Regarding response to Comment 16 of the September 18, 2017 NOD letter) Please review the following comments and revise the application as necessary. The response indicated that the elevation of deepest excavation (EDE) is 70 ft-msl located at the bottom of the leachate sumps in Units 6, 7, and 8. Please clarify whether the EDE is the elevation of the lowest point in the sump liner bottom (i.e., the top of the subgrade on which the GCL is*	

	installed) and revise the application for clarity. The revised Figures III3-4B and III3-2B appear to suggest that the bottom of sumps in the three units may have different elevations. Please double check the elevations for the same components in the sump liners and revise the application as necessary. Please ensure that the total air space will not change due to changes made to address the EDE issue.	
	The elevation of deepest excavation (EDE) at the facility of 70 ft-msl, is located at the bottom of the leachate collection sumps in Units 6, 7, and 8 - the lowest elevation of subgrade on which GCL is installed for the alternative liner. The bottom of sump elevations for in Units 6, 7, and 8 represented in Figure III3-2B do not vary. The cross-section presented in Figure III3-4B represents the elevations of landfill components in alignment with cross-section location A as shown on the key map and on Figure III3-4A. Therefore, the subgrade profile depicted for cross-section location A does not represent the EDE for Units 6, 7, and 8 because it is not aligned with respective leachate collection sump locations. The total airspace is unaffected because it was evaluated using surface models defined by the layout design depicted on aforementioned figures and no changes to airspace is required. Figures III3-4B - III3-4E, Fill Cross-Section have been revised by adding note, "The elevation of deepest excavation (EDE) for the facility is 70 ft-msl located at the bottom of leachate collection sumps for each cell within Units 6, 7, and 8 as depicted on Figures III3-2A and III3-2B."	<u>Figures</u> III3-2A III3-2B III3-4B III3-4C III3-4D III3-4E
3	*(Regarding response to Comment 17 of the September 18, 2017 NOD letter) The last paragraph in Section 2.1 on page III3-3 states, "The settlement analyses indicate that the minimum total settlement will be approximately 4 feet …" It was noticed that the elevation differences between pre- and post-settlement listed on page III3B-1-3 range from 0.1 to 4.4 feet. Please explain the meaning of "minimum total settlement" as used in Section 2.1, explain why the minimum settlement was used in the analysis, and revise the application as appropriate.*	<u>Part</u> III3 §2.1
	Part III3 §2.1, Settlement Analysis has been revised to state "the maximum total settlement will be approximately 4.4 feet".	
4	*(Regarding response to Comment 19 of the September 18, 2017 NOD letter) Please justify the low reduction factors of 1.1 used for the Open condition (the referenced literature recommends greater reduction factors for landfill leachate collection system).*	
	The open condition, representing the condition following placement of the first lift of waste, is the worst case condition yielding the greatest rate of leachate generation. The open condition is short-term and reduction in transmissivity due to intrusion, creep, chemical clogging, and biological clogging will be minor; thus justifying the use of a reduction factor of 1.1. To obtain a conservative estimate of the maximum leachate production rate, the HELP model was run for a 5-year period although the open condition is short-term and temporary. No revisions have been made in response to this comment.	
5	*(Regarding response to Comment 30 of the September 18, 2017 NOD letter) Please revise Section 5.1.2 on page III7D1-14 by removing the phrase quoted in the original comment, or revise the section to include measures to ensure that when samples are obtained at the manufacturing facility, the samples are taken from the geomembrane rolls that will be delivered to the landfill site.*	

	Retitled Part III7C §5.1.2, Conformance Testing has been revised to include language, "If collected at the manufacturing facility, samples collection shall be observed by a third party who shall record the roll number(s) sampled."	Part III7C §5.1.2
6	*(Regarding response to Comment 34 of the September 18, 2017 NOD letter) Please revise Sections 1.1.2 and 2.1.2 of Attachment 9 by removing "in accordance with 30 TAC §330.305.(j)(30)." Please also revise the Executive Summary on page III9-1 by changing §330.305.(j)(30) to §305.70(j)(30).*	
	Part III9 §1.1.2 and Part III9 §2.1.2 have been revised by removing "in accordance with 30 TAC §330.305.(j)(30)" and Part III9 §Executive Summary has been revised by changing 30 TAC §330.305.(j)(30) to 30 TAC §305.70(j)(30) as requested.	Parts III9 §1.1.2 III9 §2.1.2 III9 §ES
7	*(Regarding response to Comment 40 of the September 18, 2017 NOD letter and Informal Comment 16) During the agency review process, we received a written response from the Texas Parks and Wildlife Department (TPWD). A copy of the TPWD's November 10, 2017 response is enclosed with this letter; please review the TPWD response and revise the application as appropriate.*	
	Upon review of the TPWD's November 10, 2017 response to agency review, it appears that TPWD has a misconception of the agreement between the City and the USFWS for the 200 ft wide wildlife corridor. To clarify the agreement, the City agreed to allocate a 200 ft wide continuous corridor of City-owned property for the purpose of allowing wildlife unhindered access through City-owned property between adjacent properties to the north and to the south. The City will not disturb the land within the corridor to preserve the already existing native woodland and ranchland vegetation. If it is inadvertently disturbed by City operations, then the City agrees to re-establish native vegetation in the affected areas of the wildlife corridor and will coordinate with a qualified biologist to develop a list of native vegetation to be planted and a detailed maintenance plan that ensures an 85% survival rate of the planted vegetation after two growing seasons. TPWD's November 10, 2017 response to agency review has been added as Part IIE2-4 for reference and Part II §2.10.2, Endangered or Threatened Species and Part IV §4.18, Endanger Species Protective have been revised accordingly.	Parts IIE2-4 II §2.10.2 IV §4.18
8	*(Regarding response to Comment 44 of the September 18, 2017 NOD letter) Please review the following comments and revise the application as necessary.*	
a	*Please revise Section 4.26 of the SOP to define "material" used in this section. Please revise Section 4.26 to specify where (locations and containers) the "materials" will be stored and whether the storing containers will be covered.*	
	Part IV §4.26, Liquid Stabilization has been revised removing reference to storage of materials; and Part IVI §2.3, Materials used for Solidification/Stabilization has been added to identify the stabilizing material and bulking agents, location of material storage, and covered with a tarp or stored in a manner to minimize exposure to storm water.	Parts IV §4.26 IVI §2.3
b	*The newly added Appendix IVI of the SOP indicates that there could be more than one liquid waste solidification/stabilization areas (facility) established and operated at this landfill. Please specify the location(s) where the*	

	solidification facility will be located; approval of future additional locations may be sought through a permit modification with notice in accordance with §305.70(k)(6). Please revise Appendix IVI to include these restrictions.	
	Liquid waste solidification/stabilization area(s) are to be located within a constructed waste disposal unit that is constructed in accordance with 30 TAC §330.331(b). The location of the liquid waste solidification/stabilization area will be located based on operational feasibility and will be relocated throughout the facility's sequence of development. Part IVI §1.0, Processing Basins has been revised to clarify and add language that only one solidification/stabilization area may be operational at one time.	Part IVI §1.0
c	*Please revise Section 2.4 of Appendix IVI by replacing "If necessary, a" with "Each" or justify why a verification test will not be performed on every batch of the processed waste.*	
	Renumbered Part IVI §2.5, Verification has been revised by removing language, "If necessary," and replacing it with "Each"	Parts IVI §2.4→ IVI §2.5 IVI §2.5
d	*Please revise Appendix IVI to discuss how the wastes excavated during the basin installation will be properly managed/disposed of*	
	Part IVI §1.1, Design and Installation has been revised to state wastes excavated during the basin installation will be properly disposed at the active working face.	Part IVI §1.1
e	*Please revise Appendix IVI to state that the solidification/stabilization facility will not be installed in areas where final cover has been constructed.*	
	Part IVI §1.0, Processing Basins has been revised to state that liquid waste solidification/stabilization area will be located in an area that final cover has not been constructed.	Part IVI §1.0
f	*Information related to the solidification facility (for example, but not limited to, the facility size and maximum inventory of the waste) appears to be inconsistently represented in the various portions of the application (for example, but not limited to, Section 4.26 of the SOP, Appendix IVI, and Attachment 7 (Closure Plan)). Please revise the application for consistency.*	
	Part IV §4.6.1, Unloading Areas lists a maximum area for Liquid Stabilization Processing to be 40,000 sqft which is consistent with the maximum liquid waste acceptance rate of 50 tons day in Part IV §4.26, Liquid Waste Stabilization and the maximum number of ten basins in Part IVI §1.0, Processing Basins revised in response to Comment 2d. Part III7 §2.2, Maximum Inventory of Waste provides for the maximum capacity of the MSW landfill unit whereas any waste in the storage or processing areas may be transported to an authorized facility at closure if capacity is exceeded. No changes have been made in response to this comment.	
g	*Section 2.1 in Appendix IVI states that stabilizing material or soil will be mixed with liquid wastes in the basins. Please revise Section 2.1 to identify the "stabilizing material" or bulking agents (the bulking material should be absorbent and be consistent with the type of waste allowed for disposal at the facility). Please also provide necessary information on the soil (measures to ensure that it is not contaminated). Please include other information related to the stabilizing material or bulking agents (storage, amount in stock, etc.).*	

	Part IVI §2.3, Materials used for Solidification/Stabilization has been added to identify the stabilizing material and bulking agents, materials must meet the facility's waste acceptance criteria, uncontaminated soils used from onsite borrow source, and material storage and amount in stock.	Part IVI §2.3
9	*(Regarding response to Comment 47 of the September 18, 2017 NOD letter) Please refer to the first paragraph in the comment related to Response to Comment 45 of the September 18, 2017 NOD letter.*	
	Part IV §4.29.1, Contaminated Water states that any ponded contaminated water will be pumped within seven days. This section has been revised to further state that it will be pumped directly into either the leachate collection and removal system or the leachate force main. In addition, text has been added to Part IV §4.29.4, Cleaning and Washing of Equipment.	Parts IV §4.29.1 IV §4.29.4
10	*(Regarding response to Informal Comment 10) Please note that an alternative to the prescribed buffer zone requirement may be considered if conditions in §330.543(b)(3) are satisfied. Rule §330.543(b)(3) states, "Alternatives may be approved where the owner or operator demonstrates that: (A) the prescribed buffer zone standard is not feasible." The area in question is part of the newly proposed lateral expansion area (not the ones bordering the existing Type IV landfill), and the land bordering the proposed facility boundary at this location is also owned by the city. The application has not demonstrated that "the prescribed buffer zone standard is not feasible" per §543(b)(3)(A). As illustrated by §305.70(k)(7), moving the proposed facility boundary south by 25 feet at this location would be a feasible solution to meet the buffer zone requirement.*	
	Moving the proposed facility boundary south by 25 feet east of the existing Type IV Landfill would not be a feasible solution to meet the buffer zone requirement because the City of Edinburg plans to laterally expansion the Type IV landfill to the east. The Type I and Type IV landfills will continue to share a perimeter access road, thereby providing ready access for emergency response, maintenance, and monitoring, as well as sufficient distance to meet the drainage and sediment control requirements applicable to both facilities. The key map on Figure II-16, Facility Entrance Plan has been revised to show area of future Type IV Landfill Expansion and Part II §3.1.2.2, Alternate to Buffer Zone Requirements has been revised to include language regarding the future expansion of the Type Landfill Facility.	Part II §3.1.2.2 Figure II-16
11	*(Regarding response to Informal Comment 18) Please review the following comments and revise the application as necessary.*	
a	*The newly added Section 4.31, Waste Relocation, of the SOP states that the excavation slopes into the wastes will not be steeper than 34 degrees. Please explain the basis for setting the limit of 34 degrees (please consider the anticipated site-specific conditions). Please clarify if (and how) buried wastes in Units 5 and 6 will be removed to facilitate the Unit 8 development.*	
	The basis for setting the limit of 34 degrees is 30 TAC §330.609(3), which refers to the Occupational Safety and Health Administration 1926.652. Part IV §4.30, Waste Relocation (renumbered from "§4.31" based on revisions in response to a separate comment) has been revised to state side slopes of excavations in buried waste shall be no steeper than 3H:1V, which is 18.4 degrees. Added language that buried wastes shall be incrementally excavated per cell in its entirety.	Parts IV §4.31→ IV §4.30 IV §4.30

b	*Please revise Section 4.31 to state that the facility personnel involved in the waste relocation activities will receive proper training required by §330.247. Please add "and safety" after "safeguard health" in the last bullet in Section 4.31.*	
	Part IV §4.30, Waste Relocation (renumbered from "§4.31" based on revisions in response to a separate comment) has been revised as requested.	Parts IV §4.31→ IV §4.30 IV §4.30
c	*Please revise Section 4.31 to have measures for preventing surface runoff into the excavation areas and procedures for managing rainfall water that has become contaminated and has collected and ponded in the excavations.*	
	Part IV §4.30, Waste Relocation (renumbered from "§4.31" based on revisions in response to a separate comment) has been revised by adding reference to Part III2 §3.1.1, Run-on Control System for preventing surface runoff into the excavation areas and adding contaminated water shall be properly disposed in accordance with Part IV §4.29, Contaminated Water Management.	Parts IV §4.31→ IV §4.30 IV §4.30
12	*(Regarding response to Informal Comment 24) The response stated that "hydrostatic uplift of the stormwater pond liner is not anticipated because it is above seasonal high groundwater levels." Based on the stormwater pond liner elevations shown in Figure III2 7, the potentiometric surface maps included in Attachment 4, and the historical groundwater elevations presented in Appendix III4E, the liners of the stormwater ponds could undergo hydrostatic uplifts. Please provide more explanations or address the original comment.*	
	The elevation comparison between the bottom of the stormwater ponds (i.e. pond liner elevation) and the seasonal high groundwater level was re-evaluated and the stormwater pond design has been revised to ensure all stormwater pond bottoms are above the seasonal high groundwater level. Accordingly, Part III2 text, Appendix III2A text, Tables 2A through 2D in Appendix III2A, Appendix III2F, and Figures III2-2, III2-6, III2-7, III2-8, and III2A-2 have been updated. With this revised design, hydrostatic uplift of the stormwater pond liner is not anticipated because it is above seasonal high groundwater levels.	Parts ~~III2 §7.0~~ ~~III2F~~ III2G→III2F III2A III2F Figures II-16 II-18A II-18B II-20A II-20B II-20C II-20D1 II-20D2 II-20E III2-2 III2-6 III2-7 III2-8 III2A-2 III3-2A III3-2B III3-3 III3-4A III3-5A

		III3-5B III3-6A III3-6B III3A-1-1 III3A-1-2 III3A-1-3 III3A-1-4 III3B-1-1 III3B-1-2 III3B-2A-1 III3B-2C-1 III3B-2D-1 III3B-2D-2 III3B-3A-1 III3B-3A-2 III3B-3A-3 III3B-3B-1 III3B-3C-1 III3B-3C-2 III3D-1-1 III3E-1-1 III3E-1-2 III3E-2A-1 III3F-3A III3F-3B <u>Tables</u> III2-3 III2-4 III2A-2A III2A-2B III2A-2C III2A-2D
13	*(Regarding response to Informal Comment 40) Figure III3-8 appears to show that there is no opening between the extra geomembrane and the geomembrane below (a GCL is sandwiched between the two geomembranes). Please clarify whether the extra geomembrane will be sealed to the geomembrane below and revise Figure III3-8 and other relevant portions of the application for clarity (this will help eliminate possible confusion related to liner construction reports).*	
	Figure III3-8 has been revised to indicate that the HDPE geomembrane rubsheet will be extrusion welded to the primary geomembrane.	<u>Figure</u> III3-8
14	*(Regarding response to Informal Comment 65) Section 4.2.2.4 was revised by adding "no less that on load per day." Please explain the meaning of the added phrase or revise the section to address the original comment.*	
	Part IV §4.2.2.4, Random Inspections has been revised to specify one random inspection per day.	<u>Part</u> IV §4.2.2.4
15	*(Regarding response to Comment 45 of the September 18, 2017 NOD letter) Please review the following comments and revise the application as necessary.*	

a	*Please revise the newly added Section 4.29.1, Contaminated Water Management, to be clear that the only contaminated water addressed in this section is the contaminated water generated at the working face. Please also revise Section 4.29.1 to be specific that contaminated water contained by the containment berm at the working face will be pumped out in a timely manner. Please revise this section to include a reference to §330.305(c) for runoff management at the active/working face; and replace the term of contaminated water storage area with the term of working face. Please explain how the contaminated water will "flow" into the leachate collection and removal system or remove the contents in question. Please ensure that all contents in this section are consistent with the rules and with each other.*	
	Part IV §4.29.1, Contaminated Water has been revised to add language, "The only contaminated water addressed in this section of the SOP is the contaminated water generated at the working face."; and "contaminated water will be pumped out in a timely manner." In addition, the term of contaminated water storage area has been replaced with the term of working face and a reference to 30 TAC §330.305(c) has been added for a containment berm designed to ensure an adequate capacity for a 25-year, 24-hour rainfall event. Language has been removed on contaminated water will be allowed to flow into the leachate collection and removal system.	Part IV §4.29.1
b	*The newly added Sections 4.29.1 and 4.29.2 include discussions of pumping contaminated water and leachate into a leachate force main and refer to Part III3, Waste Management Unit Design, for more information. Please revise these sections to reference the specific location(s) where the relevant information on force main is contained in Part III3 or revise the application to include the relevant information.*	
	Parts IV §4.29.1 and §4.29.2 have been revised to reference Part III3 §4.0, Leachate Collection and Removal System for relevant information on force main.	Parts IV §4.29.1 IV §4.29.2
16	*(Regarding response to Informal Comment 18) Figure III3-4B shows that portions of the pre-Sub D areas have a subgrade lower than the proposed Unit 8 subgrade and the Unit 8 liner would be built over some buried wastes. Please clarify whether buried wastes in the pre-Sub D areas will be completely removed prior to the Unit 8 liner installation. The application is also not clear whether the pre-Sub D liners will be removed prior to installation of the Unit 8 liner. The application, including the newly added Part IV, Section 4.31, is not clear whether the Unit 8 liner system will have the same design and construction requirements as for other units; please revise the application for clarity. Given the unique situations with Unit 8, the design and construction of the Unit 8 liner may need extra considerations (including, but not limited to, liner components/configuration, specification and preparation of subgrade material, settlement analysis, tie-in with the liners of the adjacent Sub D units). Please revise the application to demonstrate these considerations. Please refer to the portions in the SLQCP that are applicable for the Unit 8 liner system, and revise the SLQCP to add contents that are unique in the Unit 8 liner system.* *Please re-evaluate the landfill air space and total waste inventory with respect to the complete or incomplete removal of buried waste in pre-Sub D areas. If revisions are made to address this comment, please revise the other relevant portions of the application as necessary.*	

	Pre-Subtitle D buried wastes are to be completely removed for the Unit 8 liner option. Figure III3-4B, Fill Cross-Sections have been revised to add note the Pre-Subtitle D wastes are to be completely removed the Unit 8 liner option. Part III3 §1.3 Landfill Unit Elevations, Part II §3.4.1 Outline of Solid Waste Management Unit, Part III3A-1 §5.2.2 Relocation of Pre-Subtitle D Waste and Construction of Unit 8 Option, and Part IV §4.30 Waste Relocation have been revised to clarify that Pre-Subtitle D wastes will be completely removed and relocated for the development of Unit 8. Part IV §4.30, Waste Relocation (renumbered from "§4.31" based on revisions in response to a separate comment) is intended operationally address the complete removal and relocation of Pre-Subtitle D wastes and does not address Unit 8 design and construction requirements. Unit 8 liner system will have the same design and construction requirements as for other units - no additional considerations are required since the Unit 8 liner system will not be constructed over pre-Subtitle D waste and will be founded over competent subgrade material. Part III3A-1, Volumes Calculations has been revised in response to Informal Comment 1 (regarding removal of ClosureTurf) and the landfill airspace and total waste inventory has been verified to have considered the complete removal of buried waste in Pre-Subtitle D Units 1 - 4 for the development of Unit 8.	Parts IV §4.31→ IV §4.30 II §3.4.1 III3 §1.3 III3A-1 §5.2.2 IV §4.30 Figures III3-4B