

June 19, 2009

Charles Ouseph, Ph.D., P.E.
MSW Permits Section, Waste Permits Division
Texas Commission on Environmental Quality
MC-124
12100 Park 35 Circle, Building F
Austin, TX 78753

Re: Fort Hood Landfill – MSW Permit No. 1866
Response to TCEQ Letter Dated April 13, 2009
Tracking No. 12614645; CN600126262/RN102778149

Dear Mr. Ouseph:

This letter is a response to a letter from the Texas Commission on Environmental Quality (TCEQ) to Fort Hood dated April 13, 2009 that serves as the first notice of deficiency (NOD) for the City's permit modification to meet 30 TAC §330 requirements.

On behalf of the U.S. Army, FNI offers the following responses to TCEQ's comments.

Comment No. 1 – The rule citations referenced in the permit modification are based on old rules. For example, under the subheading, “Special Waste Trench Design”, on page 12, the referenced rule 30 TAC §330.137 has no relevance to special wastes since this rule discusses the regulatory requirements the facility must comply with respect to placing display signs boards at all gates through which waste enters the facility. Please review and revise as needed all the old rule citations referenced in the modification application to reflect the current MSW regulation 30 TAC §330.

Revisions have been made to all rule citations referenced to reflect the current MSW regulation 30 TAC §330.

Comment No. 2 – On page 3, under the subheading, “Groundwater Monitoring System”, please review and clarify the statement, “The point of compliance along the north side of the landfill, currently located between Fill Areas 4 and 5, is based on the current location of waste in order to comply with the provision of 30 TAC §330.3 that point-of-compliance monitor wells be located no more than 500 feet from the hydraulically downgradient limit of the waste management unit boundary”.

The Fort Hood Landfill's currently approved Groundwater Monitoring System Design Certification (dated February 19, 1998) specifies a staged-approach for sampling of monitor wells. This staged-approach was developed to account for the construction phasing of new fill cells at the facility.

The proposed groundwater monitoring system was developed in consideration of the projected schedule for development of Area 4 and the requirement in 30 TAC §330.3 that point-of-compliance monitor wells be located no more than 500 feet from the hydraulically downgradient limit of the waste management unit boundary. The Army is proposing to install new monitor wells along the perimeter of the historical (Area 1), current (Area 2 and 3), and under-construction fill areas (Area 4).

When waste cells in Area 5 and Area 6 are constructed in the future, new monitor wells will be installed downgradient of those fill areas. It is not appropriate at this time to install new monitor wells downgradient of Area 5 or Area 6 because those wells would be located farther than 500 feet from waste.

This phased approach for installation of new monitor wells is consistent with oral guidance TCEQ has recently provided regarding placement of new monitor wells to meet 30 TAC §330 Subchapter J monitor well spacing requirements.

To clarify the Army's intentions, the following change has been made in the proposed Groundwater Sampling and Analysis Plan: "In compliance with 30 TAC §330.3, the current northern point of compliance boundary is located between Active Fill Area 4 and Future Fill Area 5 at the hydraulically downgradient limit of the waste management unit boundary. The point-of-compliance will be adjusted when Fill Areas 5 or 6 are utilized in the future."

Comment No. 3 – Please review rules 30 TAC §330.3, §61(b), §171, and provide a list of special wastes that the facility anticipates to dispose in the special waste trench. Please be aware that ammunition and other explosives cannot be knowingly stored or disposed anywhere within the landfill.

Language has been added to the first paragraph of page 3.3-3 that references the list of accepted special wastes.

Comment No. 4 – According to the legend in Figure 1, there are the following five categories of monitor wells: (1) current wells to be removed, (2) current downgradient monitor wells, (3) upgradient wells, (4) current piezometers for water level measurements only, and (5) proposed monitoring wells. Presently, these five different categories of monitoring wells and the follow-up five numbers of potentiometric surface maps all have same legends except for color difference. In compliance of 30 TAC §330.57(h), please revise the figures in a way the same could be reproduced legibly on black and white photocopy machines.

Revisions have been made to Figure 1 and all five potentiometric surface maps in Appendix 9 and are included for replacement in the Groundwater Sampling and Analysis Plan.

Charles Ouseph, TCEQ
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If you have any questions or need any additional information, please call me at (817) 735-7462.

Sincerely,



Robert Chambers, P.G.
Associate

Enclosures

cc: Nancy Niemann, Department of the Army
TCEQ Region 9 Office
File: ISC05344/2.10

