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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 29, 2013

The Honorable Alvin New
 Mayor, City of San Angelo
 P. O. Box 1751
 San Angelo, Texas 76902-1751

Re: City of San Angelo Landfill – Tom Green County
 Municipal Solid Waste (MSW) - Permit No. 79
 Groundwater Monitoring (GWM) –2012 Annual GWM Report
 Tracking No. 16930009; CN600251615/RN102289576

Dear Mayor New:

The Texas Commission on Environmental Quality, MSW Permits Section has received the above mentioned March 1, 2013, report concerning the GWM efforts at the above mentioned landfill. This report was submitted on your behalf by Biggs & Mathews Environmental. Thank you for your submittal.

There are 22 landfill monitoring wells (14 older and 8 new wells) that were sampled for the Title 40 Code of Federal Regulations Part 258 Appendix I metals and volatile organic compounds (VOCs), with the exception of monitor wells (MW)-18 & 20, which were reported as dry.

Statistical analysis was required for the assessment of the VOCs during all quarterly GWM events.

City of San Angelo – Current GWM System

Gradient Position	Gradient Position	Monitoring Status
Site Monitoring Wells		
MW-2	Upgradient	Corrective Action
MW-4R	Downgradient	Corrective Action
MW-5R	Downgradient	Corrective Action
MW-6R	Downgradient	Corrective Action
MW-7RR	Upgradient	Corrective Action
MW-8R	Downgradient	Corrective Action
MW-9R	Downgradient	Corrective Action
MW-10R	Downgradient	Corrective Action
MW-11R	Downgradient	Corrective Action
MW-12	Downgradient	Corrective Action
MW-13	Downgradient	Corrective Action
MW-14	Downgradient	Corrective Action
MW-15	Downgradient	Corrective Action
MW-16	Downgradient	Corrective Action
MW-17	Downgradient	Corrective Action
Gradient Position	Gradient Position	Monitoring Status
Site Monitoring Wells		
MW-18	Downgradient	Background

MW-19	Downgradient	Corrective Action
MW-20	Downgradient	Background
MW-21	Downgradient	Corrective Action
MW-22	Downgradient	Corrective Action
MW-23	Downgradient	Corrective Action
MW-24	Downgradient	Corrective Action
Offsite Monitoring Wells		
MW-59	1/2 mile downgradient	N/A - Off Site
MW-60	1/2 mile downgradient	N/A - Off Site
MW-61	1/2 mile downgradient	N/A - Off Site

Statistical Analysis for the February/March 2012 Events

We note that there were two initial statistical increases (SSIs) measured for arsenic and cobalt in MW-23; the initial SSIs were not verified and no further action required concerning the metallic results.

There were several statistical exceedences detected within several of the corrective action monitoring wells; most of the VOCs and their concentrations have been described.

It appears that there are several VOC detections in your sample results that are not discussed within the report or a part of the Appendix E Time Series Plots; the benzene concentration detected in MW-23 during the August 2012 GWM event has not been discussed within the 2012 GWM Annual Report.

Please provide an addendum to the 2012 Annual Report and include the following items:

1. As required by Title 30 TAC §330.415(e)(2), please revise the summary to state that there were additional VOC detections in several GWM wells.
2. In addition, we request that all of the 2012 GWM data be mined for VOC detections not summarized in the Appendix E Time Series Plots; we request that you discuss all of the VOCs detected during 2012 GWM.
3. Please verify that your report summary and Time Series Plots are updated to describe all of the 2012 VOC detections.
4. Please provide all of the VOC detections not currently reported in a Table format with concentration, well identification, and detection dates.

At this time, we have no other questions concerning the 2012 GWM data.

Corrective Action

There are 20 MWs in corrective action monitoring status and that there were no statistically significant increases determined for total metals in 2012.

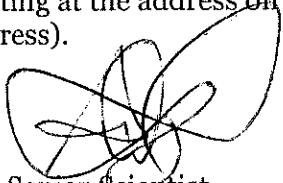
VOC concentrations still continue to fluctuate as indicated by the concentrations detected during the current and previous events. The tetrachloroethene, trichlorethene and vinyl chloride concentration results demonstrate a continued need for corrective action to improve groundwater quality at the facility.

The Honorable Alvin New
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Please respond within 30 days of the date on this letter. All submittals, including cover letters, should be provided in duplicate (one original and one copy). A copy should also be sent directly to Texas Commission on Environmental Quality Region 8, 622 South Oakes, Suite K, San Angelo, Texas 76903-7035, to the attention of Mr. Mark Newman, Waste Section Manager.

It is a continuing obligation of persons associated with a site to ensure that municipal solid wastes are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare, which are prohibited by 30 Texas Administrative Code, Chapter 330, Section 330.5(a). If you have any questions about this letter, please contact me at (512) 239-6610, or in writing at the address on our letterhead (please specify mail code MC 124 on the first line of our address).

Sincerely,



Arthur Denny, Senior Scientist
Municipal Solid Waste Permit Section
Waste Permits Division
Texas Commission on Environmental Quality

ALD/pt

cc: Ms. Dianne Davis, Biggs & Mathews Environmental, Ft. Worth TX
