January 21, 2020

Arten J. Avakian MC 124 Municipal Solid Waste Permits Section Texas Commission on Environmental Quality 12100 Park 35 Circle, Bldg. F Austin, Texas 78753

Re: Attachment 5 and Attachment 14 Permit Modification - Notice of Deficiency

McCommas Bluff Landfill, TCEQ Permit No. 62

Dallas County, Texas

Tracking No. 24812634; RN100752146/CN600331730

Dear Mr. Avakian:

On behalf of our client, the City of Dallas, please find attached this response to your comment letter addressed to Mr. Dennis Ware, dated December 9, 2019. The attachments with this document completely replace the attachments from the original submittal. Our responses to your comments are presented below in the order received.

1. Provide a clean replacement page for the revisions on page 5-4 of the GCRMP.

RESPONSE: A clean replacement page for Page 5-4 has been added.

- 2. Revise Figure 5B.1 in the GCRMP to address the following items:
 - a. Clarify whether wells MW-3R and MW-11R are already installed and revise the symbol on the drawing accordingly.
 - b. Clarify whether well MW-22 has been installed and revise the symbol on the drawing accordingly.
 - c. Confirm the location of the permit boundary on the east side of the landfill and revise the line on the drawing accordingly.

RESPONSE: a. Monitoring wells 3-R and 11-R have been installed and the symbols on Figure 5B.1 have been revised to reflect that.

- b. Monitoring well MW-22 has not yet been installed and the symbol on Figure 5B.1 has been revised to reflect that.
- c. The line designations in the legend on Figure 5B.1 have been revised to properly reflect the permit boundary, the waste footprint, the property line and the SUP line.

Identify the "5 remediation wells," "6 additional remediation wells," and "11 existing geoprobes" referenced in the newly added third paragraph in Section 6.0 of the LGMP.

RESPONSE: Additional language has been added to the text to clarify/identify which wells and geoprobes are being referenced.

4. Indicate the boring diameter on the second passive vent detail in new Drawing 4.

RESPONSE: The drawing has been updated to show that the passive vents will have an 8-inch boring diameter.

5. Provide a schedule for landfill gas monitoring in passive vents and groundwater monitor wells in the area where landfill gas remediation is ongoing.

RESPONSE: Due to the fact that passive vents will be open to the atmosphere and under a slight vacuum from the wind turbine, it is not expected that useful methane readings will be available from them. As such, no monitoring of the passive vents is planned.

For the monitoring wells, because methane readings above the regulatory limit have not been detected in MW-5 for over 3 years and in MW-20 for over 21 months, we are requesting that these monitoring wells be removed from the monitoring program. MW-13 will continue to be read monthly until achieving six consecutive months with methane below the regulatory limit, and then will move to quarterly monitoring. MW-4 and MW-12 will continue to be read weekly until achieving four consecutive methane readings below the regulatory limit. They will then move to monthly monitoring until they have been below the limit for six consecutive months, and then will move to quarterly monitoring. Quarterly monitoring will continue on all affected wells until approval is received from the TCEQ to cease monitoring.

It is expected that it will take up to 12 months for the installation of the passive vents to reach its full effect on LFG levels in the soil. Because of this, monitoring and evaluation is expected to continue for up to 12 months after the installation of the passive vents is completed. If elevated methane levels are still being detected 12 months after the installation of the additional passive vents, then the City will contact the TCEQ to discuss potential additional remediation measures.

Arten J. Avakian January 21, 2020 Page 3

If you have any questions or comments regarding this submittal, or if you need additional information, please do not hesitate to contact us.

Sincerely,

BIGGS & MATHEWS ENVIRONMENTAL TBPE No. F-256 ◆ TBPG No. 50222

Michael Snyder, P.G. Principal Hydrogeologist J. Heath Parker, P.E. Principal Engineer

Attachment 1: Permit Modification Application Form

Attachment 2: Land Ownership List/Map

Attachment 3: Permit Replacement Pages (Redline/Strikeout Format)

Attachment 4: Permit Replacement Pages

cc: TCEQ Region 4

Richard Akin, City of Dallas

ATTACHMENT 1 PERMIT MODIFICATION APPLICATION FORM

Facility Name: McCommas Bluff Landfill
Permittee/Registrant Name: City of Dallas

MSW Authorization #: 62

Initial Submittal Date: 11/21/2019

Revision Date: 1/21/2020



Texas Commission on Environmental Quality

Permit/Registration Modification and Temporary Authorization Application Form for an MSW Facility

1.	Reason for Submittal
	☐ Initial Submittal ■ Notice of Deficiency (NOD) Response
2.	Authorization Type
	■ Permit
3.	Application Type
	■ Modification with Public Notice
	☐ Temporary Authorization (TA) ☐ Modification for Name Change/Transfer
4.	Application Fees
	☐ Pay by Check ☐ Online Payment
	If paid online, e-Pay Confirmation Number: 582EA000366088
_	
5.	Application URL
	Is the application submitted for a permit/registration modification with public notice?
	■ Yes □ No
	If the answer is "Yes", enter the URL address of a publicly accessible internet web site where the application and all revisions to that application will be posted in the space provided: https://dallascityhall.com/departments/sanitation
6	Confidential Documents
0.	
	Does the application contain confidential documents?
	☐ Yes ■ No
	If "Yes", cross-reference the confidential documents throughout the application and submit as a separate attachment in a binder clearly marked "CONFIDENTIAL."

Facility Name: McCommas Bluff Landfill Initial Submittal Date: 11/21/2019 MSW Authorization #:62 Revision Date: 1/21/2020

7. G	Seneral Facility Inform	mation							
F	Facility Name: McCommas Bluff Landfill								
Ν.	MSW Authorization No.: 62								
R	Regulated Entity Referer	nce No.: RN100752146							
Р	Physical or Street Addre	ss (if available): 5100 Youngb	olood Road						
C	City: Dallas	County: Dallas	State: TX	Zip Code: 75241					
(Area code) Telephone N	Number: 214-671-0230							
L	atitude: 32°40'59.5596" N	N Longitude: -96°43'29.	1324" W						
8. F	facility Type(s)								
	■ Type I	☐ Type IV	☐ Type V						
	☐ Type I AE	☐ Type IV AE	☐ Type VI						
9. [Description of the Rev	visions to the Facility							
The Cha	Provide a brief description of all revisions to the permit/registration conditions and supporting documents referred by the permit/registration, and a reference to the specific provisions under which the modification/temporary authorization application is being made. Also, provide an explanation of why the modification/temporary authorization is requested: The purpose of this permit modification is to modify two attachments in the McCommas Bluff Landfill's Site Development Plan, Attachment 5 - Groundwater Characterization Report and Groundwater Monitoring Plan and Attachment 14 -								
Atta mo Thi Atta pas gro	Attachment 5 is being updated to address the relocation of three groundwater monitoring wells due to a previous landfill modification to the waste cell boundaries. This update relocates the point of compliance out of the permitted waste footprint. Attachment 14 is being updated to incorporate Landfill Gas (LFG) extraction wells and passive vents installed for the purpose of mitigating LFG migration into nearby groundwater monitoring wells.								
Thi	This permit modification is being submitted under §305.70(k)(3) and §305.70(k)(4).								

Facility Name: McCommas Bluff Landfill

MSW Authorization #: 62

Initial Submittal Date: 11/21/2019

Revision Date: 1/21/2020

10. Facility Contact Information

Site Operator (Permittee/Registrant) Name: City of Dallas

Customer Reference No. (if issued)*: CN 600331730

Mailing Address: 3112 Canton Street

City: Dallas County: Dallas State: TX Zip Code: 75226

(Area Code) Telephone Number: 214-671-0230 E-mail Address: richard.akin@dallascityhall.com TX Secretary of State (SOS) Filing Number:

*If the Site Operator (Permittee/Registrant) does not have this number, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Site Operator (Permittee/Registrant) as the Customer.

Operator Name¹: Same as Site Operator (Permittee/Registrant)

Customer Reference No. (if issued)*: CN

Mailing Address:

City: County: State: Zip Code:

(Area Code) Telephone Number:

E-mail Address:

Charter Number:

¹If the Operator is the same as Site Operator/Permittee type "Same as "Site Operator (Permittee/Registrant)". *If the Operator does not have this number, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Operator as the customer.

Consultant Name (if applicable): Biggs and Mathews Environmental

Texas Board of Professional Engineers Firm Registration Number: F-256

Mailing Address: 1700 Robert Road, Suite 100

City: Mansfield County: Tarrant State: TX Zip Code: 76063

(Area Code) Telephone Number: 817-563-1144 E-Mail Address: hparker@biggsandmathews.com

Agent in Service Name (required only for out-of-state):

Mailing Address:

City: County: State: Zip Code:

(Area Code) Telephone Number:

E-Mail Address:

Initial Submittal Date: 11/21/2019 Facility Name: McCommas Bluff Landfill MSW Authorization #: 62 Revision Date: 1/21/2020

11. Ownership Status of the Facility								
	Is this a modification that changes the legal description, the property owner, or the Site Operator (Permittee/Registrant)?							
☐ Yes ■ No								
If the answer is "No", skip	this section.							
Does the Site Operator (Peproperty?	Does the Site Operator (Permittee/Registrant) own all the facility units and all the facility property?							
☐ Yes ☐ No								
If "No", provide the inform	ation requested below for	any additional o	wnership.					
Owner Name:								
Street or P.O. Box:								
City: Co	ounty:	State:	Zip Code:					
(Area Code) Telephone Nu	mber:							
Email Address (optional):	Email Address (optional):							
Charter Number:								

Facility Name: McCommas Bluff Landfill

Initial Submittal Date: 11/21/2019 MSW Authorization #:62 Revision Date: 1/21/2020

Signature Page

, Assistant City Manager
d Signatory) (Title)
nd all attachments were prepared under system designed to assure that qualified mation submitted. Based on my inquiry of or those persons directly responsible for tted is, to the best of my knowledge and there are significant penalties for oility of fine and imprisonment for knowing
Date: 01-16-2020
PLICATION IS SIGNED BY AN AUTHORIZED
gnate(Print or Type Representative Name)
(Print or Type Representative Name)
s Solid Waste Disposal Act permit. I contents of this application, for oral re in support of the application, and for permit which might be issued based upon executive Officer
aid Joey Zaparz Julys , 2020

Facility Name: McCommas Bluff Landfill

MSW Authorization #: 62

Initial Submittal Date: 11/21/2019

Revision Date: 1/21/2020

Permit/Registration Modification with Public Notice

(See Instructions for P.E. seal requirements.)

Required Attachments	Attachment No.
Land Ownership Map	_
Land Ownership List	2
Marked (Redline/Strikeout) Pages	3
Unmarked Revised Pages	4
Additional Attachments as Applicable- Select all those apply a	nd add as necessary
☐ Signatory Authority	
☐ Fee Payment Receipt	
☐ Confidential Documents	

ATTACHMENT 2 LAND OWNERSHIP LIST/MAP

McCommas Landfill Adjacent Property Owners Dallas Central Appraisal District, November 19, 2019

1	QUALITY AUTO RECYCLERS LLC	13	JOSE H VALDEZ & MARIA
	1001 W PLEASANT RUN RD		DELCARMEN VALDEZ
	DESOTO TX 75115-2801		3922 SHINDOLL ST
			DALLAS TX 75216-4027
2	DP RESOURCES LLC	14	MARTIN RAMIRO AVILA
	9727 STONE RIDGE CIRCLE DALLAS TX 75231		3104 POINT EAST DR MESQUITE TX 75150-2638
			·
3	BROWN FAMILY LEWISVILLE RR FAMILY 1ST LP	15	440 EQUIPMENT LLC 5111 GREENVILLE AVE #601655
	5610 HARBOR TOWN DR		DALLAS TX 75360-0680
	DALLAS TX 75287-7413		
4	LLOYD E MILLER	16	COUNTY OF DALLAS
	10305 S CENTRAL EXPY		411 ELM ST
	DALLAS TX 75241-7316		DALLAS TX 75202-3301
5	JACK & LOIS APPERSON	17	NICKS BIG TRUCK SALES
	1113 GREENBRIAR DR		417 SUNFLOWER ST
	GARLAND TX 75043-5321		RED OAK TX 75154-4221
6	BRUCE & GAY FRAZER	18	COMET AUTO SALVAGE INC
	2929 WESTMINSTER AVE DALLAS TX 75205-1508		PO BOX 711 HUTCHINS TX 75141-0711
		4.5	
7	ONCOR ELECTRIC DELIVERY COMPANY	19	ENVIRONMENTAL INVESTMENTS LP
	PO BOX 139100		3048 HIGH RIDGE DR
	DALLAS TX 75313-9100		GRAPEVINE TX 76051-6807
8	METROPOLITAN SAND & GRAVEL	20	CASA FLORA INC
	COLLC		PO BOX 41140
	10 MARYVIEW LN		DALLAS TX 75241-0140
	SAINT LOUIS MO 63124-1247		
9	ELISEO J & AMAPOLA MARTINEZ	21	ANGELA ONEAL ET AL
	1201 SHADY GROVE IRVING TX 75060-6219		9734 SOPHORA CIR DALLAS TX 75249-1422
10		22	
10	PRESTIGE GRAM VENTURE LLC 7045 PORTOBELLO DR	22	SOUTHERN PACIFIC TRANS CO 1400 DOUGLAS ST STOP 1640
	PLANO TX 75024-7570		OMAHA NE 68179-1001
11	GERALDINE G CANGELOSE	23	UTSI FINANCE INC
' '	804 KELLI CIR		12755 E 9 MILE RD
	SULPHUR SPRINGS TX 75482-5078		WARREN MI 48089-2621
12	MARGARITO HERNANDEZ LOPEZ	24	SOUTHWEST PERENNIALS INC
	2758 GLADSTONE DR		P O BOX 170867
	DALLAS TX 75211-5205		DALLAS TX 75217-0867

McCommas Landfill Adjacent Property Owners Dallas Central Appraisal District, November 19, 2019

25	CALVIN H SHAHAN 1600 NOKOMIS RD LANCASTER TX 75146-5547	37	RANDALL RHODES 462 LOMA LINDA PALMER TX 75152-8149
26	GERALDINE GENEVA 804 KELLI CIR SULPHUR SPRINGS TX 75482-5078	38	MULAT AHMED MUHAMED 2513 REDBROOK DR GARLAND TX 75040-3740
27	SONIA MARILU GARCIA MELENDEZ 9919 BERMUDA DR DALLAS, TX 75241-7342	39	GAYTAN PROPERTIES LTD 801 PELLEGRINO CT LAREDO TX 78045-8216
28	U S REALTY HOLDINGS LTD 2415 W NORTHWEST HWY STE 105 DALLAS TX 75220-4446	40	RUIBAL FARMS LP 601 S PEARL EXPWY DALLAS TX 75201-6013
29	OMAR ACEITUNOFUENTES 9319 BERMUNDA RD DALLAS TX 75241	41	LEONARDO ANDRADE PO BOX 571 HUTCHINS TX 75141-0571
30	HUFFHINES PROPANE LLC PO BOX 709 HUTCHINS TX 75141-0709	42	CAMILO RODEA 9430 BERMUDA RD DALLAS TX 75241-7338
31	ANASTACIO SAMPAYO & SONIA SANCHEZ 3006 RUIDODO AVE DALLAS TX 75228	43	ADALBERTO YANEZ FLORES 9433 S CENTRAL EXPY DALLAS TX 75241-7325
32	MARY LOU COULSTON LF EST 9325 BERMUDA RD DALLAS TX 75241-7342	44	METROPOLITAN SERVICES LLC 2717 WICKHAM CT PLANO TX 75093
33	JACOBO HERNANDEZ & MARIA DEL ROSARIO 9331 BERMUDA RD DALLAS TX 75241-7342	45	LU ROS MACHINE INC. 9449 S CENTRAL EXPY DALLAS TX 75241-7325
34	CAR REY INC 9303 CORIANDER PL DALLAS TX 75217-8656	46	DESEV INVESTMENT GROUP LLC 310 OXFORD DR RICHARDSON TX 75080-5411
35	GENARO VINIEGRA 9339 BERMUDA RD DALLAS TX 75241-7342	47	ALMIRA INDUSTRIAL & TRADING CORP PO BOX 143343 IRVING TX 75014-3343
36	HELIODORO VINIEGRA & MARIA VINIEGRA 9340 BERMUDA RD DALLAS TX 75241-7337	48	GACHMAN METAL & RECYCLING INC. PO BOX 308 FORT WORTH TX 76101-0308

McCommas Landfill Adjacent Property Owners Dallas Central Appraisal District, November 19, 2019

49	US DELIVERY LLC 302 BROOKWOOD DR RICHARDSON TX 75080-4730
50	THE NELAN COMPANY PO BOX 180101 DALLAS TX 75218-0101
51	IRENE VAZQUEZ 9915 S CENTRAL EXPY DALLAS TX 75241-7320
52	UNION PACIFIC RR CO 1400 DOUGLAS ST STOP 1640 OMAHA NE 68179-1001
53	CITY OF DALLAS 1500 MARILLA ST DALLAS TX 75201
54	ASTEROID AUTO SALVAGE INC. 10701 CF HAWN FWY DALLAS TX 75217-8049
55	WHITE ANDRE 9255 S. CENTRAL EXPY DALLAS TX 75241-7512
56	CCR EQUITY HOLDINGS ONE LLC 906 W MCDERMOTT DRIVE STE 116-321 ALLEN TX 75013-6510

BIGGS & MATHEWS ENVIRONMENTAL CONSULTING ENGINEERS

MANSFIELD ◆ WICHITA FALLS 817-563-1144

DSN. JHP DATE: 11/19 DWN. SRC SCALE : GRAPHIC

CHK. JHP DWG : QuarterMileOwnership.DWG

DWN BY DES BY CHK BY APP BY

REV DATE

TBPG FIRM NO. 50222

ATTACHMENT 3

PERMIT REPLACEMENT PAGES (REDLINE/STRIKEOUT FORMAT)

SITE DEVELOPMENT PLAN ATTACHMENT 5

MCCOMMAS BLUFF LANDFILL DALLAS COUNTY, TEXAS TCEQ PERMIT NO. MSW 62

PERMIT MODIFICATION

ATTACHMENT 5 GROUNDWATER CHARACTERIZATION REPORT AND GROUNDWATER MONITORING PLAN

Prepared for

City of Dallas

February 2009 Revised June 2009 Revised June 2014

Revised January 2020



Prepared by

BIGGS & MATHEWS ENVIRONMENTAL

1700 Robert Road, Suite 100 • Mansfield, Texas 76063 • 817-563-1144

TEXAS BOARD OF PROFESSIONAL ENGINEERS FIRM REGISTRATION NO. F-256 TEXAS BOARD OF PROFESSIONAL GEOSCIENTISTS FIRM REGISTRATION NO. 50222



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1-21-2020

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2 GROUNDWATER MONITORING SYSTEM

2.1 Monitoring Well Locations

A revised monitoring system is herein proposed and shown on Figure 5B.1 that meets the spacing requirements of Subchapter J. Spacing between all wells in the proposed system is less than 600 feet.

The existing groundwater monitoring system monitors the Alluvium overlying the Austin Chalk. The existing approved system consists of 16 wells (3 upgradient and 13 downgradient wells) that are currently installed. The remaining wells in the approved system are to be phased in as cell development progresses in the northeast part of the site. The location of the approved monitoring plan is shown on Figure 5B.3.

The system will ultimately consist of 29 monitoring wells. MW-1, MW-2, and MW-10 are existing upgradient wells. MW-3R, MW-4, MW-5, MW-6, MW-7R, MW-11R, MW-12, MW-13, MW-14R, MW-15, MW-16, MW-17, MW-18, MW-19, MW-20, and MW-21 are currently installed. MW-3R and MW-11R (which will replace existing MW-3 and MW-11) will be installed following approval of this modification.

The other proposed wells will be installed in a phased approach tied to future cell development. Specifically, MW-22 through MW-25 will be installed prior to waste filling in Cell 7A, MW-26 through MW-28 will be installed prior to waste filling in Cell 8, and MW-29 through MW-31 will be installed prior to waste filling in Cell 9. The monitoring well locations are shown on Figure 5B.1. The monitoring well details are included on Figure 5B.2.

There will be no lapse in detection monitoring while background is obtained for new wells. Wells in the existing monitoring system that are proposed to be plugged and abandoned will continue in detection monitoring until detection monitoring can begin in the modified monitoring system.

2.2 Monitoring Well Design

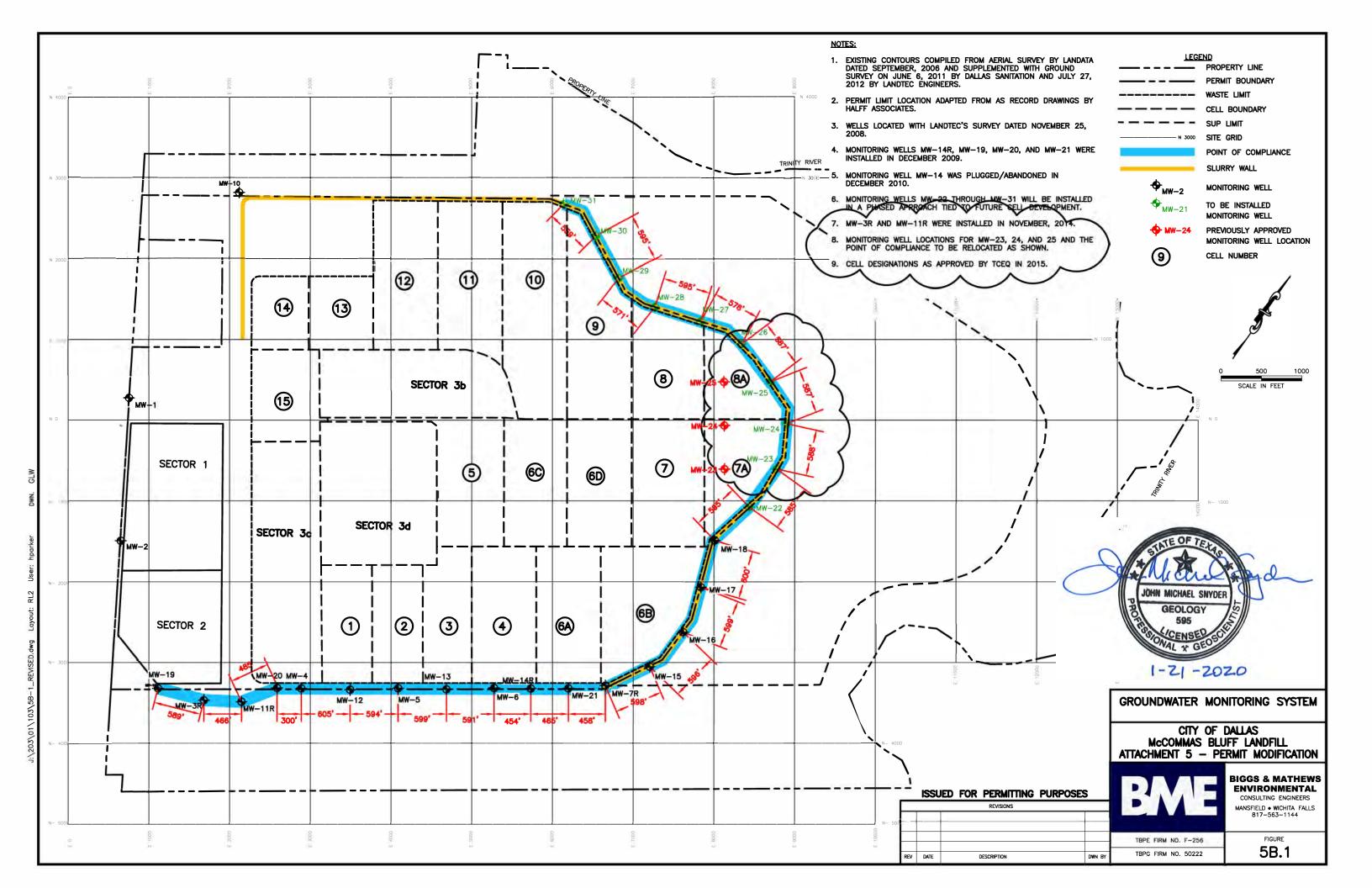
Groundwater monitoring well details are shown on Figure 5B.2 of this attachment. Typically, the wells consist of 4-inch diameter, flush-threaded PVC (Schedule 40) with 0.01-inch slotted PVC screens. Monitoring wells will have 10-foot screens. The filter pack sand will be a 20-40 grade silica sand and will be placed from total well depth to about 3 feet above the top of the well screen. A 3-foot-thick bentonite seal consisting of bentonite pellets will be hydrated in place on top of the filter pack sand. The remainder of the well boring is pressure grouted with bentonite grout to within 2 feet of the surface.

Table 3
McCommas Bluff Landfill
Monitoring Well Details

Monitoring Well No.	Northing	Easting Ground Elevation Total Well Casing Elevation Depth Depth Depth Casing Elevation Elevation Screened Interval (ft)		Inte	Pack erval ft)						
			(ft/msl)	(ft/msl)	(ft)	(ft/msl)	(ft)	From	То	From	То
Currently Approved Monitoring Wells											
MW-1	274.43	757.33	398.90	370.40	28.50	400.73	12.40	17.50	27.50	12.00	28.50
MW-2	-1493.27	652.26	397.75	349.25	48.50	399.82	30.00	36.50	46.50	18.00	48.50
MW-3	-3330.70	1694.48	390.95	359.95	31.00	394.95	17.50	20.00	30.00	12.00	31.00
MW-4	-3320.27	2888.79	408.98	353.59	55.39	412.36	34.00	44.69	55.19	42.89	55.39
MW-3R	-3466.32	<u>1682.19</u>	<u>387.65</u>	358.65	<u>29.0</u>	389.96	<u>19.02</u>	18.50	28.50	<u>16.50</u>	<u>29.0</u>
MW-5	-3318.03	4087.43	410.03	353.03	57.00	413.47	40.30	46.10	56.60	45.00	57.00
MW-6	-3316.26	5277.17	410.74	353.59	57.15	413.47	33.00	46.65	57.15	44.65	57.15
MW-7R	-3287.13	6654.99	404.00	324.00	80.00	406.44	37.30	69.00	79.00	35.00	80.00
MW-10	2819.11	2121.16	408.23	367.73	40.50	410.70	19.00	29.40	39.90	27.50	40.50
MW-11	-3282.88	2230.41	412.06	357.06	55.00	415.80	44.00	37.00	55.00	35.00	55.00
<u>MW-11R</u>	<u>-3487.80</u>	2148.53	385.73	359.23	<u>26.5</u>	388.30	<u>17.28</u>	<u>16.00</u>	<u>26.00</u>	14.00	<u>26.5</u>
MW-12	-3337.86	3493.64	409.58	347.53	62.05	413.39	34.00	39.05	62.05	37.05	62.05
MW-13	-3332.73	4686.08	406.00	348.88	57.12	409.24	42.00	32.12	57.12	27.12	57.12
MW-14R	-3322.64	5731.55	407.40	357.90	49.50	409.86	37.00	39.50	49.50	34.50	49.50
MW-15	-3051.76	7204.41	403.00	321.00	82.00	405.85	37.83	72.00	82.00	40.00	82.00
MW-16	-2623.38	7618.84	403.10	346.10	57.00	406.60	34.37	47.00	57.00	29.00	57.00
MW-17	-2065.75	7838.63	403.00	343.00	60.00	406.73	35.58	50.00	60.00	30.00	60.00
MW-18	-1489.56	8007.27	403.10	341.10	62.00	406.77	36.05	52.00	62.00	32.00	62.00
MW-19	-3282.78	1152.39	402.57	351.57	51.00	405.18	27.18	41.00	51.00	36.00	51.00
MW-20	-3315.26	2588.15	410.03	360.53	49.50	412.36	36.00	39.50	49.50	34.00	49.50
MW-21	-3319.98	6196.52	407.23	355.23	52.00	409.63	37.05	42.00	52.00	36.50	52.00
MW-22*	<u>-1077.06</u>	8436.07	403.00	337.00	63.00	402.00	19.00	53.00	63.00	47.50	63.00
MW-23*	<u>-605.89</u>	<u>8776.11</u>	402.00	343.00	47.00	392.00	17.00	37.00	47.00	31.50	47.00
MW-24*	<u>-43.63</u>	<u>8900.70</u>	<u>401.00</u>	347.00	37.65	386.65	11.00	27.65	37.65	22.15	37.65
MW-25*	<u>475.09</u>	<u>8696.34</u>	402.00	353.00	31.01	386.01	11.00	21.01	31.01	15.51	31.01
MW-26*	944.39	8343.37	400.00	350.00	50.00	402.00	27.00	40.00	50.00	34.50	50.00
MW-27*	1224.85	7837.83	400.00	345.00	55.00	402.00	27.00	45.00	55.00	39.50	55.00
MW-28*	1403.41	7270.25	400.00	345.00	55.00	402.00	27.00	45.00	55.00	39.50	55.00
MW-29*	1757.04	6821.33	400.00	355.00	45.00	402.00	27.00	35.00	45.00	29.50	45.00
MW-30*	2280.86	6539.12	400.00	365.00	35.00	402.00	27.00	25.00	35.00	19.50	35.00
MW-31*	2673.68	6141.32	400.00	370.00	30.00	402.00	27.00	20.00	30.00	14.50	30.00
				Proposed	Monitorii	ng Wells					
MW-3R	-3466.32	1682.19	390.00	360.00	30.00	392.00	17.00	20.00	30.00	14.50	30.00
MW-11R	-3487.80	2148.53	390.00	360.00	30.00	392.00	17.00	20.00	30.00	14.50	30.00

^{*}Wells will be installed prior to waste filling in Cells $7\underline{\text{A}}$, 8, and 9

MCCOMMAS BLUFF LANDFILL APPENDIX 5B GROUNDWATER MONITORING SYSTEM



Groundwater Monitoring System Design Certification

General Site Information

Site:	McCommas Bluff Landfill	
Site Location:	Dallas County, Texas	
MSW Permit No :	62	

Qualified Groundwater Scientist Statement

I, Michael Snyder, am a registered professional geologist in the State of Texas and a qualified groundwater scientist as defined in §330.3. I have reviewed the groundwater monitoring system and supporting data contained herein. In my professional opinion, the groundwater monitoring system is in compliance with the groundwater monitoring requirements specified in 30 TAC §330.401 through §330.409. This system has been designed for specification application to the McCommas Bluff Landfill (Permit No. MSW 62). I warranty that I have used that degree of care and skill ordinarily exercised under similar conditions by reputable members of my profession, practicing in the same or similar locality. No other warranty, expressed or implied, is made or intended.

Firm/Address: Biggs and Mathews Environmental, Inc.

1700 Robert Rd. Suite 100 Mansfield, TX 76063

Signature:

Michael Snyder, P.G. No. 595 - Texas

Date:

JOHN MICHAEL SNYDER

GEOLOGY
595

1-21-2020

FIGURE 5B.4

SITE DEVELOPMENT PLAN ATTACHMENT 14

ATTACHMENT 14

LANDFILL GAS MANAGEMENT PLAN

McCOMMAS BLUFF LANDFILL PERMIT NO. MSW-62 CITY OF DALLAS

DALLAS COUNTY, TEXAS

Prepared by Robert W. Mosley, P.E.

March 1994

Revised

July 1998
June 2001
February 2002
September 2006
May 2016
January 2020



FOR PERMIT MODIFICATION REVISIONS TO SECTION 6 AND APPENDIX 1

LANDFILL GAS MANAGEMENT PLAN

McCOMMAS BLUFF LANDFILL

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1.0 INTRODUCTION

- **1.1** Purpose
- **1.2** Facility Description

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- **2.1** Geologic conditions
- **2.2** Hydrogeologic conditions
- 2.3 Facility Structures within Property Boundary
- **2.4** Utility lines / Easements
- 2.5 Off-site Structures

3.0 MONITORING

- **3.1** Perimeter Monitoring
 - **3.1.1** Monitoring Probe Placement
 - **3.1.2** Monitoring Probe Construction Details
 - **3.1.3** Monitoring Probe Inspection and Maintenance
 - **3.1.4** Monitoring Procedures
- **3.2** Facility Structures Monitoring
- 3.3 Utility Trench Vent Monitoring
- **3.4** Reporting

4.0 CONTINGENCY PLAN

- 4.1 Perimeter Monitoring
- 4.2 Facility Structure Monitoring
- 4.3 Utility Trench Vent Monitoring

5.0 EXPLOSIVE GAS SAFETY

6.0 LANDFILL GAS COLLECTION

FOR PERMIT MODIFICATION REVISIONS TO SECTION 6



Existing LFG Collection and Control System

Currently, the site has an active LFG collection and control system (GCCS), as shown in Appendix D of Appendix 1 on Drawing 1. The existing GCCS consists of vertical LFG extraction wells, a piping network, a condensate management system, and a blower/flare facility, and a landfill gas-to-energy (LFGTE) facility. The existing blowers provide vacuum to the extraction wells through the LFG collection piping network. The extracted LFG is routed from the collection points to the LFGTE facility. Any remaining extracted LFG not sent to the LFGTE facility is diverted to an on-site flare where the gas is combusted.

From 2000-2015, approximately 265 wells were drilled, 119 wells were redrilled, and 35 horizontal collectors were added to the GCCS. These wells and horizontals are shown on Drawing 2 in Appendix D of Appendix 1.

In 2015, 5 remediation wells (RW-1 through RW-5) were installed in Sector 3C to limit migration of LFG in this area. In 2016, 6 additional remediation wells (RW-6 through RW-11) were installed in Sector 3C. All of these wells were completed similar to typical extraction wells at the site, except that they were drilled to within 5 feet of the bottom of waste. Following the installation of the remediation wells, 11 existing (PV-1 through PV-9, PV-11, and PV-12) geoprobes outside of waste near the edge of Sector 3C and Cell 1 were converted to passive vents. The locations of the remediation wells and passive vents is shown on Drawing 2A in Appendix D of Appendix 1.

In 2020, three of the existing converted passive vents (PV-1, PV-4, and PV-5) will be removed and replaced with passive vents with a larger diameter casing. Also, eight additional passive vents will be added in the area between PV-2 and PV-6 to provide a closer spacing between the vents in order to better intercept any potential migrating LFG. Three additional passive vents will also be added near MW-13. These additional passive vents are also shown on Drawing 2A in Appendix D of Appendix 1.

In addition, a shallow clay cutoff trench has been constructed on the south side of the site adjacent to Sector 3C, Cell 1, and Cell 2. This trench was installed near the limits of waste, above the anchor trench, to serve as a barrier to prevent potential migration of LFG using the liner protective cover layer as a pathway. To install the trench, all of the soil above the anchor trench, including the protective cover, was excavated. This area was then backfilled with compacted clay to ground surface.

As additional waste is placed, the existing LFG extraction wells will be extended and/or redrilled as necessary.

Future GCCS Expansions

As the site develops, additional extraction wells will be installed as needed to reduce the buildup of internal gas pressures caused by the increased generation of LFG. Additional blowers and piping network will be installed as needed to provide the vacuum and capacity to handle the flow rate of LFG in the future.

Operation and Maintenance

Wellhead and system monitoring will be performed on a routine basis to monitor overall system performance. As needed, system adjustments will be made to optimize the extraction of LFG from the landfill to control LFG migration, odors, and greenhouse gases. In addition, the system will be routinely visually inspected for any evidence of needed repairs or other maintenance. General maintenance procedures will include the following:

- Each wellhead will be monitored and adjusted as needed to control LFG while reducing oxygen intrusion into the landfill.
- Condensate sumps will be checked for proper operation.
- Blowers and flares will be inspected for proper operation.

LANDFILL GAS COLLECTION AND CONTROL SYSTEM DESIGN PLAN REPORT CITY OF DALLAS MUNICIPAL SOLID WASTE LANDFILL – MSW PERMIT No. 62

Appendix 1 to Attachment 14

Prepared for City of Dallas

Dallas, TX

Original Report July 1998

Revised June 2001

Supplement to June 2001 Revision-February 2002

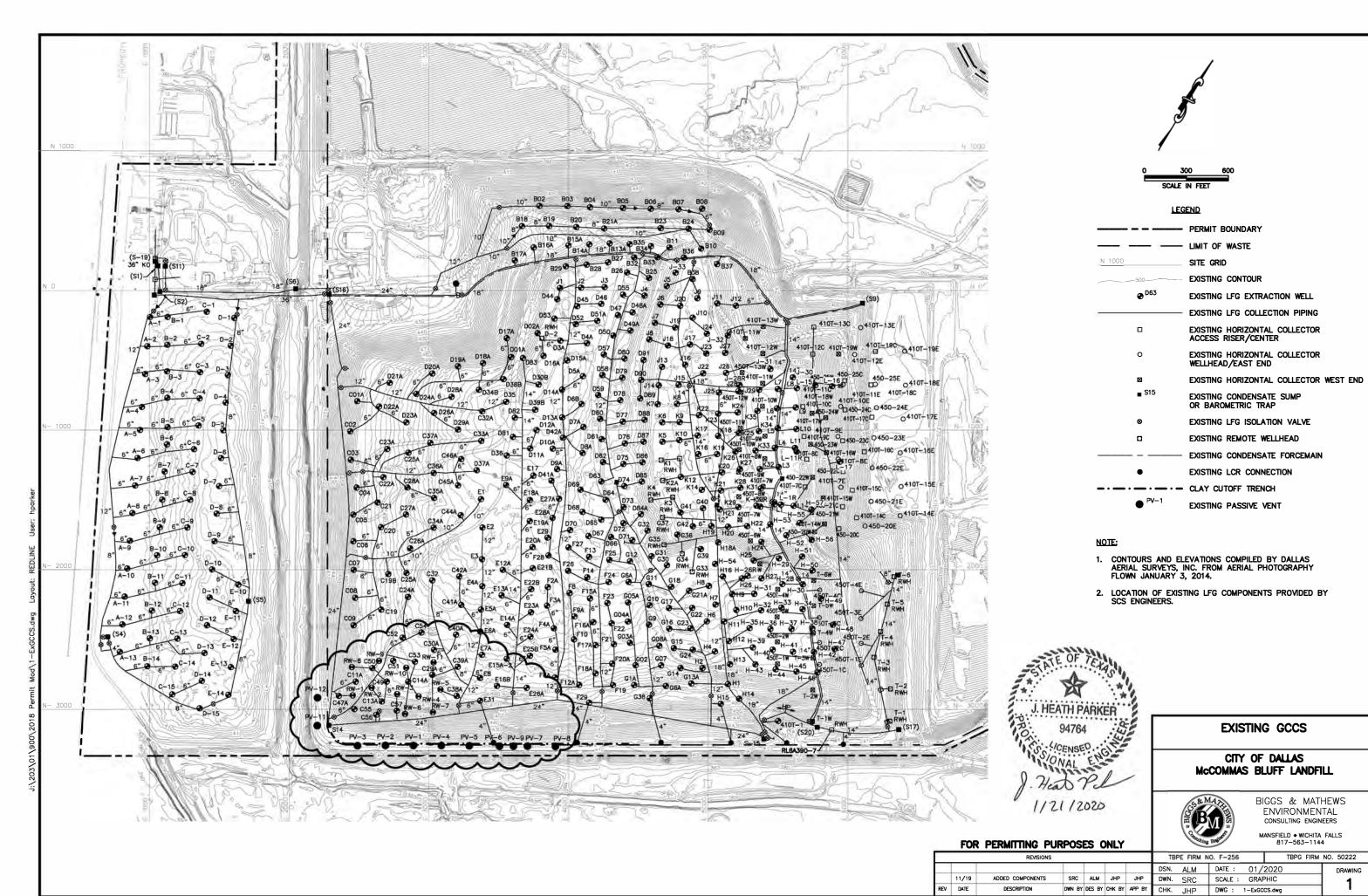
Revised September 2006

Revised May 2016

Revised January 2020



FOR PERMIT MODIFICATION REVISIONS TO APPENDIX 1



ATTACHMENT 4 PERMIT REPLACEMENT PAGES

SITE DEVELOPMENT PLAN ATTACHMENT 5

MCCOMMAS BLUFF LANDFILL DALLAS COUNTY, TEXAS TCEQ PERMIT NO. MSW 62

PERMIT MODIFICATION

ATTACHMENT 5 GROUNDWATER CHARACTERIZATION REPORT AND GROUNDWATER MONITORING PLAN

Prepared for

City of Dallas

February 2009 Revised June 2009 Revised June 2014

Revised January 2020

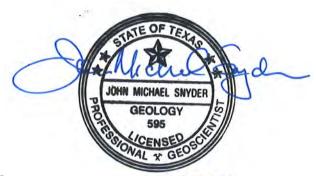


Prepared by

BIGGS & MATHEWS ENVIRONMENTAL

1700 Robert Road, Suite 100 • Mansfield, Texas 76063 • 817-563-1144

TEXAS BOARD OF PROFESSIONAL ENGINEERS FIRM REGISTRATION NO. F-256 TEXAS BOARD OF PROFESSIONAL GEOSCIENTISTS FIRM REGISTRATION NO. 50222



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2 GROUNDWATER MONITORING SYSTEM

2.1 Monitoring Well Locations

A revised monitoring system is herein proposed and shown on Figure 5B.1 that meets the spacing requirements of Subchapter J. Spacing between all wells in the proposed system is less than 600 feet.

The existing groundwater monitoring system monitors the Alluvium overlying the Austin Chalk. The existing approved system consists of 16 wells (3 upgradient and 13 downgradient wells) that are currently installed. The remaining wells in the approved system are to be phased in as cell development progresses in the northeast part of the site. The location of the approved monitoring plan is shown on Figure 5B.3.

The system will ultimately consist of 29 monitoring wells. MW-1, MW-2, and MW-10 are existing upgradient wells. MW-3R, MW-4, MW-5, MW-6, MW-7R, MW-11R, MW-12, MW-13, MW-14R, MW-15, MW-16, MW-17, MW-18, MW-19, MW-20, and MW-21 are currently installed. The other proposed wells will be installed in a phased approach tied to future cell development. Specifically, MW-22 through MW-25 will be installed prior to waste filling in Cell 7A, MW-26 through MW-28 will be installed prior to waste filling in Cell 8, and MW-29 through MW-31 will be installed prior to waste filling in Cell 9. The monitoring well locations are shown on Figure 5B.1. The monitoring well details are included on Figure 5B.2.

There will be no lapse in detection monitoring while background is obtained for new wells. Wells in the existing monitoring system that are proposed to be plugged and abandoned will continue in detection monitoring until detection monitoring can begin in the modified monitoring system.

2.2 Monitoring Well Design

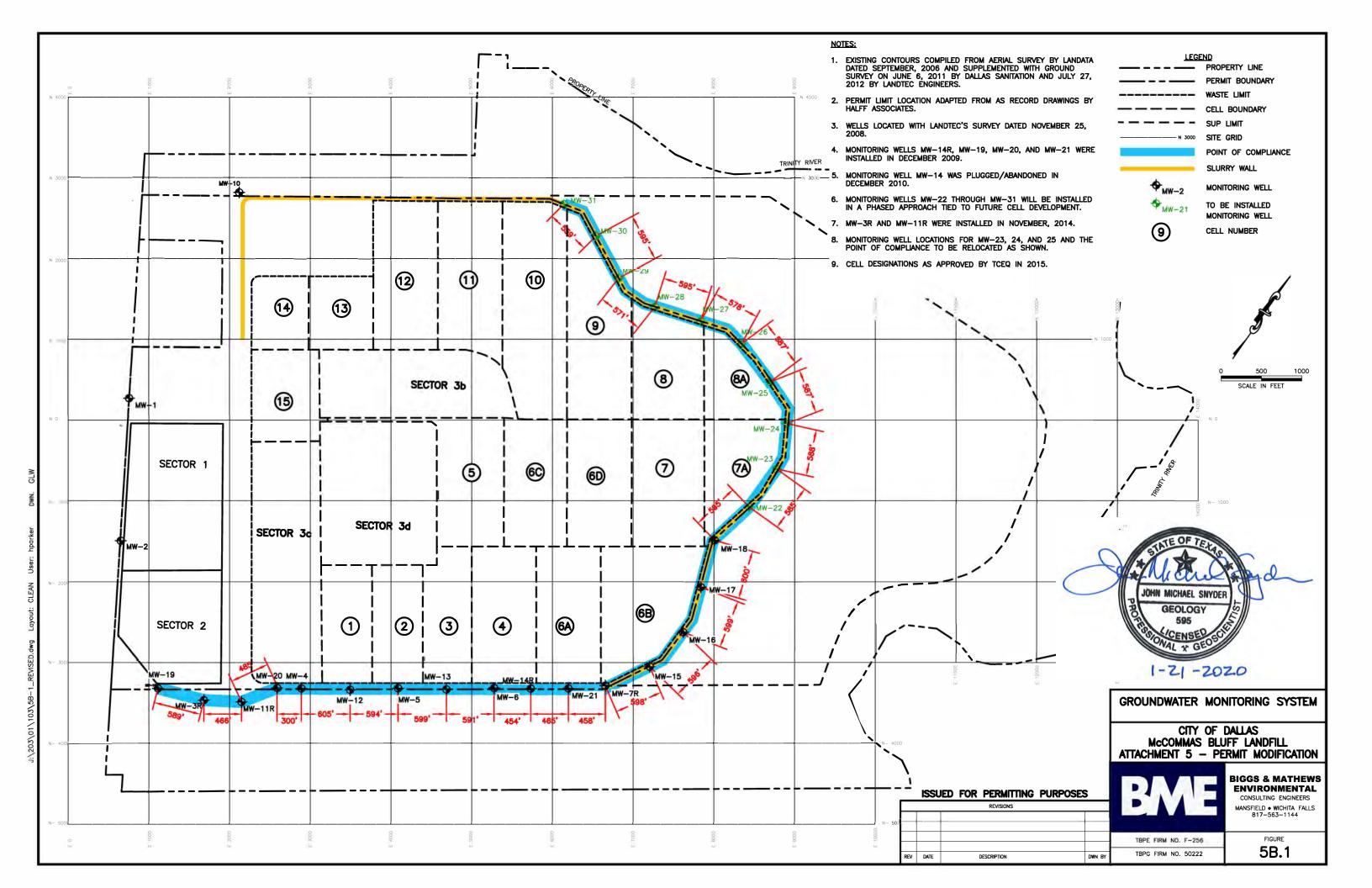
Groundwater monitoring well details are shown on Figure 5B.2 of this attachment. Typically, the wells consist of 4-inch diameter, flush-threaded PVC (Schedule 40) with 0.01-inch slotted PVC screens. Monitoring wells will have 10-foot screens. The filter pack sand will be a 20-40 grade silica sand and will be placed from total well depth to about 3 feet above the top of the well screen. A 3-foot-thick bentonite seal consisting of bentonite pellets will be hydrated in place on top of the filter pack sand. The remainder of the well boring is pressure grouted with bentonite grout to within 2 feet of the surface.

Table 3
McCommas Bluff Landfill
Monitoring Well Details

Monitoring Well No.	Northing	Easting	Ground Elevation	Total Dep		Top of Casing Elevation	Depth to Groundwater	Inte	ened rval t)	Inte	Pack erval ft)
			(ft/msl)	(ft/msl)	(ft)	(ft/msl)	(ft)	From	То	From	То
			Curr	ently Appr	oved Moi	nitoring Wells					
MW-1	274.43	757.33	398.90	370.40	28.50	400.73	12.40	17.50	27.50	12.00	28.50
MW-2	-1493.27	652.26	397.75	349.25	48.50	399.82	30.00	36.50	46.50	18.00	48.50
MW-4	-3320.27	2888.79	408.98	353.59	55.39	412.36	34.00	44.69	55.19	42.89	55.39
MW-3R	-3466.32	1682.19	387.65	358.65	29.0	389.96	19.02	18.50	28.50	16.50	29.0
MW-5	-3318.03	4087.43	410.03	353.03	57.00	413.47	40.30	46.10	56.60	45.00	57.00
MW-6	-3316.26	5277.17	410.74	353.59	57.15	413.47	33.00	46.65	57.15	44.65	57.15
MW-7R	-3287.13	6654.99	404.00	324.00	80.00	406.44	37.30	69.00	79.00	35.00	80.00
MW-10	2819.11	2121.16	408.23	367.73	40.50	410.70	19.00	29.40	39.90	27.50	40.50
MW-11R	-3487.80	2148.53	385.73	359.23	26.5	388.30	17.28	16.00	26.00	14.00	26.5
MW-12	-3337.86	3493.64	409.58	347.53	62.05	413.39	34.00	39.05	62.05	37.05	62.05
MW-13	-3332.73	4686.08	406.00	348.88	57.12	409.24	42.00	32.12	57.12	27.12	57.12
MW-14R	-3322.64	5731.55	407.40	357.90	49.50	409.86	37.00	39.50	49.50	34.50	49.50
MW-15	-3051.76	7204.41	403.00	321.00	82.00	405.85	37.83	72.00	82.00	40.00	82.00
MW-16	-2623.38	7618.84	403.10	346.10	57.00	406.60	34.37	47.00	57.00	29.00	57.00
MW-17	-2065.75	7838.63	403.00	343.00	60.00	406.73	35.58	50.00	60.00	30.00	60.00
MW-18	-1489.56	8007.27	403.10	341.10	62.00	406.77	36.05	52.00	62.00	32.00	62.00
MW-19	-3282.78	1152.39	402.57	351.57	51.00	405.18	27.18	41.00	51.00	36.00	51.00
MW-20	-3315.26	2588.15	410.03	360.53	49.50	412.36	36.00	39.50	49.50	34.00	49.50
MW-21	-3319.98	6196.52	407.23	355.23	52.00	409.63	37.05	42.00	52.00	36.50	52.00
MW-22*	-1077.06	8436.07	403.00	337.00	63.00	402.00	19.00	53.00	63.00	47.50	63.00
MW-23*	-605.89	8776.11	402.00	343.00	47.00	392.00	17.00	37.00	47.00	31.50	47.00
MW-24*	-43.63	8900.70	401.00	347.00	37.65	386.65	11.00	27.65	37.65	22.15	37.65
MW-25*	475.09	8696.34	402.00	353.00	31.01	386.01	11.00	21.01	31.01	15.51	31.01
MW-26*	944.39	8343.37	400.00	350.00	50.00	402.00	27.00	40.00	50.00	34.50	50.00
MW-27*	1224.85	7837.83	400.00	345.00	55.00	402.00	27.00	45.00	55.00	39.50	55.00
MW-28*	1403.41	7270.25	400.00	345.00	55.00	402.00	27.00	45.00	55.00	39.50	55.00
MW-29*	1757.04	6821.33	400.00	355.00	45.00	402.00	27.00	35.00	45.00	29.50	45.00
MW-30*	2280.86	6539.12	400.00	365.00	35.00	402.00	27.00	25.00	35.00	19.50	35.00
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^{*}Wells will be installed prior to waste filling in Cells 7A, 8, and 9

MCCOMMAS BLUFF LANDFILL APPENDIX 5B GROUNDWATER MONITORING SYSTEM



Groundwater Monitoring System Design Certification

General Site Information

Site:	McCommas Bluff Landfill	
Site Location:	Dallas County, Texas	
MSW Permit No :	62	

Qualified Groundwater Scientist Statement

I, Michael Snyder, am a registered professional geologist in the State of Texas and a qualified groundwater scientist as defined in §330.3. I have reviewed the groundwater monitoring system and supporting data contained herein. In my professional opinion, the groundwater monitoring system is in compliance with the groundwater monitoring requirements specified in 30 TAC §330.401 through §330.409. This system has been designed for specification application to the McCommas Bluff Landfill (Permit No. MSW 62). I warranty that I have used that degree of care and skill ordinarily exercised under similar conditions by reputable members of my profession, practicing in the same or similar locality. No other warranty, expressed or implied, is made or intended.

Firm/Address: Biggs and Mathews Environmental, Inc.

1700 Robert Rd. Suite 100 Mansfield, TX 76063

Signature:

Michael Snyder, P.G. No. 595 - Texas

Date:

JOHN MICHAEL SNYDER

GEOLOGY
595

1-21-2020

FIGURE 5B.4

SITE DEVELOPMENT PLAN ATTACHMENT 14

ATTACHMENT 14

LANDFILL GAS MANAGEMENT PLAN

McCOMMAS BLUFF LANDFILL PERMIT NO. MSW-62 CITY OF DALLAS

DALLAS COUNTY, TEXAS

Prepared by Robert W. Mosley, P.E.

March 1994

Revised

July 1998 June 2001 February 2002 September 2006 May 2016 January 2020



FOR PERMIT MODIFICATION REVISIONS TO SECTION 6 AND APPENDIX 1

LANDFILL GAS MANAGEMENT PLAN

McCOMMAS BLUFF LANDFILL

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6.0 LANDFILL GAS COLLECTION

FOR PERMIT MODIFICATION REVISIONS TO SECTION 6



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From 2000-2015, approximately 265 wells were drilled, 119 wells were redrilled, and 35 horizontal collectors were added to the GCCS. These wells and horizontals are shown on Drawing 2 in Appendix D of Appendix 1.

In 2015, 5 remediation wells (RW-1 through RW-5) were installed in Sector 3C to limit migration of LFG in this area. In 2016, 6 additional remediation wells (RW-6 through RW-11) were installed in Sector 3C. All of these wells were completed similar to typical extraction wells at the site, except that they were drilled to within 5 feet of the bottom of waste. Following the installation of the remediation wells, 11 existing (PV-1 through PV-9, PV-11, and PV-12) geoprobes outside of waste near the edge of Sector 3C and Cell 1 were converted to passive vents. The locations of the remediation wells and passive vents is shown on Drawing 2A in Appendix D of Appendix 1.

In 2020, three of the existing converted passive vents (PV-1, PV-4, and PV-5) will be removed and replaced with passive vents with a larger diameter casing. Also, eight additional passive vents will be added in the area between PV-2 and PV-6 to provide a closer spacing between the vents in order to better intercept any potential migrating LFG. Three additional passive vents will also be added near MW-13. These additional passive vents are also shown on Drawing 2A in Appendix D of Appendix 1.

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LANDFILL GAS COLLECTION AND CONTROL SYSTEM DESIGN PLAN REPORT CITY OF DALLAS MUNICIPAL SOLID WASTE LANDFILL – MSW PERMIT No. 62

Appendix 1 to Attachment 14

Prepared for City of Dallas

Dallas, TX

Original Report July 1998

Revised June 2001

Supplement to June 2001 Revision-February 2002

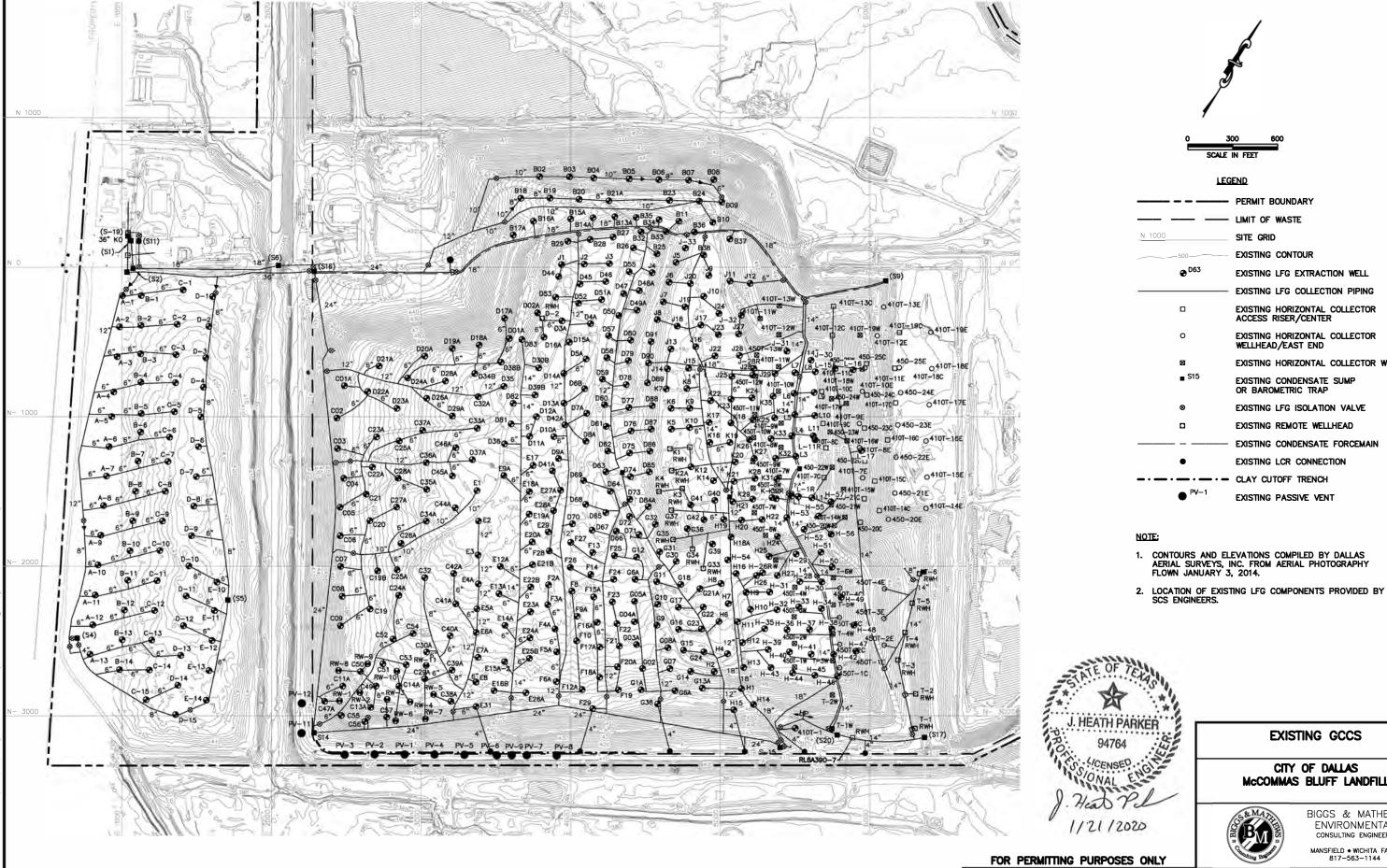
Revised September 2006

Revised May 2016

Revised January 2020



FOR PERMIT MODIFICATION REVISIONS TO APPENDIX 1



		PERMIT BOUNDART
	_ =	LIMIT OF WASTE
N 1000		SITE GRID
	-500	EXISTING CONTOUR
	⊕ ^{D63}	EXISTING LFG EXTRACTION WELL
·		EXISTING LFG COLLECTION PIPING
		EXISTING HORIZONTAL COLLECTOR ACCESS RISER/CENTER
	0	EXISTING HORIZONTAL COLLECTOR WELLHEAD/EAST END
	⊠	EXISTING HORIZONTAL COLLECTOR WEST END
	■ S15	EXISTING CONDENSATE SUMP OR BAROMETRIC TRAP
	⊗	EXISTING LFG ISOLATION VALVE
		EXISTING REMOTE WELLHEAD
		EXISTING CONDENSATE FORCEMAIN
	•	EXISTING LCR CONNECTION
-·- ·		CLAY CUTOFF TRENCH
	● PV-1	EXISTING PASSIVE VENT

CITY OF DALLAS McCOMMAS BLUFF LANDFILL

BIGGS & MATHEWS ENVIRONMENTAL CONSULTING ENGINEERS

MANSFIELD ◆ WICHITA FALLS 817-563-1144

TBPG FIRM NO. 50222 DWN. SRC SCALE : GRAPHIC REV DATE DWN BY DES BY CHK BY APP BY CHK. JHP DWG: 1-ExGCCS.dwg

