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ACL 4-302  
9-9-99

## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

September 9, 1999

Mr. Jack Steele  
Area Manager  
Waste Management, Inc.  
P.O. Box 14644  
Austin, TX 78754

Re: Municipal Solid Waste - Travis County  
WMT/Austin Community Landfill - MSW Permit No. 249C  
Repair Report and Interim Status Report

Dear Mr. Steele:

On July 28, 1999, we received the Repair Report and the Interim Status Report (ISR) for Cell WD-3 at the above referenced facility. The reports were submitted under a cover letter dated July 26, 1999, signed by Mr. Rusty Fusilier, P.E., Project Manager, and Steven M. Hamilton, R.E.P., Vice President, SCS Engineers.

The ISR documents repairs to the protective cover and includes a reverification survey indicating sufficient cover thickness in the portion of the cell southeast of Grid 27+00. This area may therefore be used for solid waste disposal in accordance with your permit. The remainder of the cell can be used for solid waste disposal after submission of the ISR documenting the adequacy of the protective cover in the remainder of the cell.

The Flexible Membrane Liner Evaluation Report (FMLER) for this cell indicated that protective cover was completed on September 28, 1998. 30 TAC 330.206(e) requires that liner areas not covered by waste within a period of six months must be checked by the SLER evaluator, with a letter report (i.e. ISR) submitted to TNRCC. The ISR indicates that inspections of the protective cover were done on January 20, 1999 and June 7, 1999. These inspections meet the 6-month requirements of 30 TAC 330.206(e); however, the report covering these inspections was not submitted until July 1999. Please submit future ISRs for each inspection date in a more timely fashion.

The Repair Report indicates that the slide which occurred between the geonet/geotextile and the underlying geomembrane on the northwest slope of the cell appears to have been repaired in accordance with the site development plan. The slide, however, raises questions regarding the adequacy of the design of the sideslope liner system, as the analyses done for the 1995 permit modification indicate that the slope configuration (i.e. 2 ft of cover soil over geotextile-topped geonet and textured geomembrane) should have had a factor of safety of 1.3 against sliding for the 20-ft height of cover soil which was constructed. Please re-analyze the stability of the design section and indicate whether any changes (such as lowering the 20-ft incremental cover placement or replacing the single-sided geonet with a double-sided geocomposite) are being planned for future cells.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: [www.tnrcc.state.tx.us](http://www.tnrcc.state.tx.us)

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TJFA 434  
PAGE 001

WM-053082

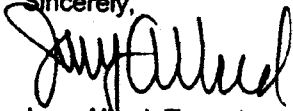
TJFA 434  
PAGE 002

Mr. Jack Steele  
Page 2  
September 9, 1999

The sideslopes (both reconstructed and unfailed sections) need to be monitored carefully for any future movement. Please notify TNRCC immediately in the event any future slides occur (we note that over six months had passed between this slide occurrence and notification to TNRCC by the repair report).

If you have any questions concerning this letter please contact Mr. Ron Czajkowski, P.E., MC124, at (512) 239-6739.

Sincerely,



Jerry Alfred, Team Leader  
MSW Permits Section  
Waste Permits Division  
Texas Natural Resource Conservation Commission

JDA/RLC

cc: Mr. Rusty Fusilier, P.E., SCS Engineers  
Mr. Brian Dudley, P.E., Brian Dudley Engineering

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