



September 23, 1999  
File No. 1699007.00

ACCL 4.3.2  
9-23-99  
**AUSTIN COMMUNITY LANDFILL**  
A WASTE MANAGEMENT COMPANY

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Austin, TX 78714-1968  
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Mr. Jerry Allred, Team Leader  
MC124  
MSW Permits Section  
Waste Permits Division  
Texas Natural Resource Conservation Commission  
P. O. Box 13087  
Austin, Texas 78711-3087

**SUBJECT: Municipal Solid Waste - Travis County**  
Austin Community Recycling and Disposal Facility - Permit No. MSW 249-C  
TNRCC Comments Concerning Repair Report for Cell WD-3

Dear Mr. Allred:

On behalf of Waste Management of Texas, Inc. (WMTX), I am writing in response to your letter dated September 9, 1999 which approved the repair and interim status reports for Cell WD-3 submitted under a cover letter from SCS Engineers dated July 26, 1999. In your letter, you indicated that the required repairs to address the geonet/geotextile slide on the northwest slope raised "questions regarding the adequacy of the design of the sideslope liner system." You noted that the design for the cell should have provided for a factor of safety of 1.3 for sliding when the protective cover is placed in 20-foot vertical increments on the sideslope. You requested a reanalysis of the slope stability to determine if any changes in design or construction are needed.


We appreciate your concern about this matter. However, we do not believe that reanalysis of the slope stability is necessary. The geonet/geotextile fabric slide was caused by weather conditions and not design-related issues. The failure occurred during an intense rainfall event when water overtopped the bank of the drainage channel adjacent to the northwest portion of the cell and flowed into the cell. In addition to saturating and eroding the protective cover on this portion of the cell sideslope, the water eroded the compacted soil cover in the anchor trench at the top of the slope, thereby allowing the geonet and fabric to pull loose and resulting in the slide. Fortunately, the erosion was not excessive enough to impact the underlying geomembrane liner. After replacement of the geonet and geotextile fabric, compacted soil was placed over the anchor trench in accordance with the design plans. Additional compacted soil was then placed to create a berm between the cell and the drainage channel in an effort to prevent a reoccurrence of this event.

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I trust that this response will be satisfactory and that reanalysis of the slope stability will not be necessary. If this is not the case or you have additional questions regarding this matter, please contact me at telephone number (512) 272-6225 in Austin.

Sincerely,  
Waste Management of Texas, Inc.



Jack Steele  
Area Manager

JS:js

cc: Marcos Elizondo, WMTX  
Kim Borges, WMTX  
Rusty Fusilier, SCS Engineers  
Brian Dudley, Dudley Engineering

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