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| **Response to Comments**  **Hardin County Landfill Horizontal Expansion**  **AI 1671; Activity APE20070005** |

The Division of Waste Management (DWM), Solid Waste Branch received the application for a Horizontal Expansion of a Contained Landfill from Hardin County Contained Landfill, permit #047-00040, for review on August 16, 2007. Public Notice #1 was issued on November 8, 2007. Public Notice #2 and #3 was issued on April 16, 2014. A draft permit public notice was issued on October 19, 2017 with a 30 day comment period. The following is a brief description of the comments received and DWM’s response.

**Comment 1:** A commenter stated that an archaeological review survey should be conducted and the results submitted to the Kentucky Heritage Council.

**Response:** A cultural resource survey was conducted and forwarded to the Kentucky Heritage Council for review. Additional information may be found in attachment 8 of the administrative application.

The permit was not changed in response to this comment.

**Comment 2:** The permittee stated that the Hardin County Fiscal Court physical address had moved to the new Hardin County Government Building at 150 North Provident Way. This was a change in both the number and street and zip code. The PO Box on the permit was correct.

**Response:** It is the responsibility of the applicant/permittee to notify DWM of address changes. The draft permit was issued consistent with information provided by the fiscal court in the permit application submitted to DWM. Given the written request of the applicant/permittee on November 17, 2017 via a comment, the permittee address information has been updated.

The final permit was changed as described in response to this comment.

**Comment 3:** The permittee noted that statistical analysis of the underdrain monitoring group should be conducted in accordance with the approved plan, which requires intrawell analysis.

**Response:** The permit was modified to contain the following revised permit condition:

Monitoring Data: For the purposes of statistical analyses, the owner or operator shall use the ChemStat software, STATISTICA software, or another program with equivalent functionality. [401 KAR 47:120 Section 2, 401 KAR 48:300 Section 4]

**Comment 4:**  The permittee requested clarification of the schedule for characterization sampling of new groundwater and surface water monitoring locations.

**Response:** Regarding surface water monitoring, pursuant to 401 KAR 48:300 Section 2(5), characterization sampling shall occur prior to the disturbance of any areas proposed for development in the landfill, and shall include a minimum of two (2) samples collected at least 30 days apart.Given that disturbance (i.e., soil removal and blasting) has already occurred, the sampling should be conducted as soon as possible.

Regarding groundwater monitoring,401 KAR 48:300 Section 3 requires a minimum of two (2) groundwater characterization samples taken before waste placement. Compliance sampling begins after waste placement.

The permit was changed to include the following revised permit condition:

The permittee shall provide a groundwater quality characterization for each monitored spring as specified in 401 KAR 48:300 Section 3. The characterization shall include the results of analysis of at least two (2) samples of groundwater collected before waste placement for the parameters listed in 401 KAR 48:300 Section 10(3). The characterization samples should be collected a sufficient time apart in order to accurately characterize the monitoring point(s). [401 KAR 47:180 Section 6(2)(a), 401 KAR 48:300 Section 3]

**Comment 5:**  The permittee commented that the two monitoring site springs (SWM-6 and SWM-7) should be surface water monitoring points on the permit.

**Response:** No applicableKentucky Revised Statute orKentucky Administrative Regulation defines springs as surface water. Note the following:

* 401 KAR 48:005 (70) defines “groundwater” as “the subsurface water occurring in the zone of saturation beneath the water table, and perched water zones below the B-soil horizon, including water circulating through fractures, bedding planes, and solution conduits”
* 401 KAR 48:005 (12) defines “aquifer” as “a geologic formation, group of formations, or part of a formation capable of yielding a significant amount of groundwater to wells or springs”
* 401 KAR 48:300 Section 2(2) requires that “surface water monitoring points are to be located such that the sampling shall determine if water leaving the landfill in surface drainage is contaminated with leachate”
* 401 KAR 48:300 Section 5(2) states that for groundwater monitoring systems, “the cabinet may allow one (1) or more springs for monitoring points in addition to downgradient wells, if the springs are hydraulically downgradient from the area in which solid waste has or shall be disposed, if the springs are sampled in a manner approved by the cabinet, and if the springs otherwise meet the requirements of the cabinet.

DWM regards springs SW-6 and SW-7 as groundwater monitoring points. The permit was not changed in response to this comment.