



# GUAM ENVIRONMENTAL PROTECTION AGENCY

## AHENSIAN PRUTEKSION LINA'LA GUAHAN

FELIX P. CAMACHO  
GOVERNOR OF GUAM

P.O. Box 22439 GMF • BARRIGADA, GUAM 96921  
TEL: 475-1658/9 • FAX: 477-9402

MICHAEL W. CRUZ  
LT. GOVERNOR OF GUAM

22 MAY 2009

Mr. David L. Manning  
Receiver Representative  
Gershman, Brickner & Bratton, Inc.  
542 North Marine Corps Drive  
Tamuning, Guam 96913  
Attention: Christopher Lund, Senior Project Engineer

SUBJECT: Groundwater Phase I Baseline Monitoring Program (BMP) and Non-RCRA Subtitle D Regulated Activities Associated With the Layon Municipal Solid Waste Landfill, Located on Lot No. B-3 REM-2, Dandan Road, Malojloj

Dear Mr. Manning:

The Guam Environmental Protection Agency (Guam EPA), in consultation with the United States Environmental Protection Agency, Region IX (EPA), acknowledges the importance of groundwater baseline monitoring, and that this critical part of work precedes the solid waste landfill permit issuance. We understand that this work enables the applicant (i.e. *Receiver*) to establish and the regulatory agency to review the groundwater detection monitoring program proposed by the applicant for the purposes of the permit to detect releases during landfill operations, and to help ensure the protection of public health and the environment.

As a result, the *Receiver* may proceed with the installation of groundwater monitoring wells for the Phase I baseline monitoring program with the following conditions:

1. Prior to well installation, resubmit to this Agency for review and approval, the amended *Site Specific Groundwater Monitoring Plan* (SSGWMP, March 2009), which describes the proposed Phase I Baseline Monitoring Program (BMP). A copy should also be provided to EPA. This *Plan* must include a Quality Assurance Project Plan (QAPP), and reflect the amendments discussed in the previous technical conference calls and comments. At a minimum, the QAPP should include the quality requirements for the Phase I BMP field measurements for groundwater parameters such as pH, specific electrical conductance (SEC),

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temperature, oxidation-reduction potential (ORP), turbidity, and total alkalinity.

In addition, the (BMP) baseline monitoring program described in Phase 1 must provide for full compliance with the requirements delineated in Guam's *Solid Waste Disposal Rules and Regulations*, Chapter 23, regarding the facility's groundwater monitoring systems as noted in your *Site Specific Ground Water Monitoring Plan, Book 3* (December 2008).

2. Prior to well installation, submit the well installation permit application to this Agency for review and processing.
3. Within forty-five (45) calendar days after completing the 6<sup>th</sup> baseline monitoring event or March 31, 2010, whichever is earlier; submit to this Agency a draft of the groundwater Detection Monitoring Program (DMP).
4. Within forty-five (45) calendar days after completing the final baseline monitoring event, submit to this Agency a final of the groundwater DMP.
5. No waste shall be accepted at the facility prior to this Agency's approval of the final DMP.

In closing, after numerous discussions regarding the subject above, and given the amount of final studies and data already submitted and reviewed related to the facility, this letter also serves to confirm that Guam EPA has no basis to object to construction related to roads and utilities, and ancillary facilities and appurtenances that are not for the primary or explicit purpose of disposing, storing, treating, transferring, or processing solid waste.

Should you have any questions, please feel free to contact Ms. Conchita SN Taitano or Ms. Crispin Bensan at 475-1658/9.

Sincerely,



LORILEE T. CRISOSTOMO  
Administrator