



**England-Thims & Miller, Inc.**

DEP  
NORTHEAST DISTRICT  
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January 14, 2011

Mr. Emerson C. Raulerson, P.E.  
Solid Waste Section Supervisor  
Florida Department of Environmental Protection  
7825 Baymeadows Way, Suite 200B  
Jacksonville, FL 32256-7590

**PRINCIPALS**

Douglas C. Miller, P.E., CEO  
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Juanitta Bader Clem, P.E., V.P.  
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**EMERITUS**

James E. England, P.E.  
Robert E. Thims

**RE: Trail Ridge Landfill**  
**WACS I.D. Number: NED/16/00033628**  
**Minor Modification Application of the Class I Landfill Permit**  
**FDEP File Number 0013493-018**  
**Fourth Request for Additional Information**  
**ETM No. 07-044**

Dear Mr. Raulerson:

In response to Department comments dated December 3, 2010 regarding the above-referenced project, we offer the following response. Please note each comment (bold face type) is repeated below, followed by our response in italics.

**SOLID WASTE SECTION**

**2. a. Response is not adequate. DEP is not clear as what the proposal describes. Please clarify.**

*We agree that our response requires clarification as follows:*

*When, according to the Personnel Matrix, a second spotter is required, the first spotter will be located on the ground and the second spotter shall be provided in one of the following ways:*

- a. The additional spotter will be on the ground, or*
- b. The additional spotter will be an equipment operator/spotter on a machine equipped with a grapple attachment (for removal of unacceptable waste) on the working face, or*
- c. The additional spotter will include multiple equipment operators/spotter (in numbers consistent with the approved Personnel Matrix) on machines without grapple attachments on the working face.*

*It is our understanding that the above was agreed to in our meeting with the Department on October 21, 2010.*

- c. (1) Response is not adequate. DEP requested the Applicant to “please utilize the Operation Plan submitted in Second Response to DEP Request for Additional Information, prepared by England-Thims and Miller, Inc. (dated May 6, 2009 as a**

Re: Trail Ridge Landfill  
Fourth Request for Additional Information

**basis and reflect the proposed changes in this Application.” However, the February 27, 2009 dated Operation Plan was used as a basis. Please note, during the Permit Renewal application process, the May 2009 Plan contained changes that had been made to the February 2009 Plan. It is therefore imperative that the May 2009 Plan be the one that is used as the basis. Please address by reflecting the changes and submitting the revised Operation Plan.**

*The Operation Plan submitted in Second Response to DEP’s Request for Additional Information, prepared by England-Thims and Miller, Inc. dated May 6, 2009 was used as a basis. However, the May 6, 2009 Operation Plan included February 27, 2009 at the bottom right margin (not May 6, 2009). The Operation Plan as submitted includes the changes that were made to the May 6, 2009 document, dated February 27, 2009.*

*The Operation Plan included in our response was provided in two different formats. The first format (Section A) included the revised Operation Plan as a clean copy (with no tracked changes). The second format (Section B) included the same revised operation plan including all tracked changes. Please note that all underlines represent additions and strikeouts represent deletions.*

**3. The response is adequate.**

*No response required.*

**13. Response is not adequate. Please address the following amendments of Chapter 62-701:Rule 62-701.510(3)(d)5, Rule 62-701.510(7)(a), Rule 62-701:Rule 62-701.510(7)(b), Rule 62-701:Rule 62-701.510(7)(c), Rule 62-701:Rule 62-701.510(8)(c) – Temperature was not added, Rule 62-701.600(2), Rule 62-701.600(3), and Rule 62-701.630.**

- a. *Rule-701.510(3) (d) 5, F.A.C. - The existing groundwater monitoring wells have protective bollards and have a locking mechanism to prevent unauthorized access. Please note that this requirement is already included in Specific Condition 45 f of the current permit.*
- b. *Rule 62-701.510(7)(a), (b), and (c), F.A.C. - The Permittee agrees to provide evaluation monitoring, prevention measures and corrective action in accordance with Rule 62-701.510(7)(a), (b), and (c), F.A.C. We herby request that the Department modify Specific Condition 45.o. to be in accordance with this new rule.*
- c. *Rule 62-701.510(8) (c), F.A.C. - We concur that temperature was not included. Therefore please add temperature to Specific Condition 40 for leachate monitoring to comply with this new rule.*
- d. *Rule 62-701.600(2), F.A.C. - The entire landfill is one solid waste disposal unit, so the rule change does not apply (the facility does not require a closure permit for incremental closures) and a closure permit is not required until the final increment is ready for closure. The permit renewal included the closure plans and details as well as the corresponding QA/QC plan which will be utilized for the incremental closures. Therefore, there is no need to submit for a closure permit and we believe that the facility is in compliance.*

Re: Trail Ridge Landfill  
Fourth Request for Additional Information

- e. Rule 62-701.600(3), F.A.C. - To the best of our knowledge, the facility/design is in compliance with this rule. The geomembrane to be utilized in the Top Slope closure will have an average thickness of 40 mil as shown on approved Permit Drawing Number 20. In addition, the stability analysis of the cover system and the disposed waste was conducted during the Second Permit Renewal (Attachment C of the third RAI response).
- f. Rule 62-701.630, F.A.C. - The Financial Assurance Cost Estimate was updated as part of the Permit Renewal. Therefore, we believe that we are in compliance with this requirement.

We trust these comments adequately address your concerns. Please contact me at 904-265-3181 or via email at [clmJ@etminc.com](mailto:clmJ@etminc.com) should you require additional information or have any questions.

Sincerely,

ENGLAND-THIMS & MILLER, INC.

  
Juanita Bader Clem, P.E.  
Vice President

1/14/2011

Attachments:

cc: Greg Mathes, Trail Ridge Landfill, Inc.  
Jeff Foster, City of Jacksonville  
Jim Christiansen, Trail Ridge Landfill, Inc.  
Brian Dolihite, Trail Ridge Landfill, Inc.  
Eric Parker, Trail Ridge Landfill, Inc.  
Edward Schmalfeld, P.E., Trail Ridge Landfill, Inc.  
Scott Lockwood, P.E., ETM  
File

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