



Florida Department of Environmental Protection

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Lt. Governor

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Secretary

March 5, 2012

E-Mail

mkaiser@wasteservicesinc.com

Mr. Mike Kaiser
Omni Waste of Osceola County, LLC
1501 Omni Way
St. Cloud, Florida 34773

OCD-SW-12-075

Osceola County - SW WACS # 89544
J.E.D. Solid Waste Management Facility
Class I - Operations Permit Renewal
Second Request for Additional Information
Permit Application No. SO49-0199726-022

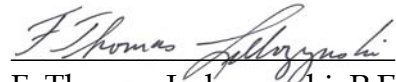
Dear Mr. Kaiser:

The additional information dated February 8, 2012 and received on February 10, 2012 was reviewed. The items listed on the attached page remain incomplete. Evaluation of your application will continue to be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact Kim Rush at (407) 897-4314 or by e-mail at kim.rush@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script, reading "F. Thomas Lubozynski", written in dark ink.

F. Thomas Lubozynski, P.E.
Waste Program Administrator

FTL/kr

Enclosure

cc:

Victor M. Damasceno, Ph.D., P.E. – Geosyntec Consultants, vdamasceno@geosyntec.com

Note that all references to "Report" in the following text refer to the document titled, "Response to First Request for Additional Information, Renewal Permit Application to Operate Phases 1 Through 4 of the J.E.D. Solid Waste Management Facility," prepared by Geosyntec consultants, dated February 8, 2012.

The item numbers below refer to the item numbers in the First Request for Additional Information, OCD-SW-11-399 dated December 7, 2011.

10. The Department has reviewed the detailed cost estimate for Cells 1 through 8, Attachment 5 of the submittal and has the following comments and questions.
 - a. In section IV Estimating Closing Costs, include the closure cost for the waste tire processing facility in item 13. Site Specific Costs.
 - b. In section IV Estimating Closing Costs, include the closure cost of the auto fluff recycler in item 13. Site Specific Costs.
 - c. A 5% contingency was included in both the closure cost and long-term care cost. The Department accepts a contingency of 10% without justification. Provide justification for the lower contingency of 5%.
 - d. In section V Annual Cost for Long-Term Care, item 5 Leachate Collection/Treatment Systems Maintenance, Disposal, the estimated quantity of leachate generated during long-term care is given as 4,000 gallons per year for 74 acres of closed Class I landfill. This estimate seems low. Upon review of the provided cost estimate supporting data, the rate of 184.3 gal/ac/yr is considerably lower than 20% of historically reported generation rates for the site. For reference, the Department has accepted estimated quantities of leachate generated from closed Class I landfills in the range of 26,000,000 gallons per year for 147 acres (176,871 gal/ac/yr) and 10,128,000 gallons per year for 115 acres (88,070 gal/ac/yr). Please reevaluate the estimated amount of leachate which will be generated during the long-term care period. Provide the basis for the values offered. (For example, why was "20 percent of the annual average leachate generation rate for the maximum waste height" considered an appropriate value?)
 - e. In section V Annual Cost for Long-Term Care, item 5 Leachate Collection/Treatment Systems Maintenance, Disposal, the cost for the annual transportation and disposal of 4,000 gallons of leachate is estimated to be \$160/yr. This estimate seems low. The 3/12/2009 e-mail from the city of St. Cloud stated how to calculate a monthly disposal bill.

Using your estimate of 4,000 gal/year and their method, the monthly cost would be about \$108. This would be an annual disposal cost of \$1,296. Based upon phone conversations with you, the Department understands that this monthly rate calculation may not be applicable when disposing of leachate on a yearly basis. Also, as stated in "d" above, the Department considers the 4,000 gal/year estimate to be too low. Please reevaluate the estimated cost for the disposal of leachate based on your answer to "d" above.

- 11.c. The response indicated that the value of 12 ug/L (I) for Mercury in MW-19A in the May 2011 sampling event was a clerical error at the lab. A copy of the revised report was included in the response to the RAI. However, the incorrect value of 12 ug/L is still the result of record in the Department's WACS data base. Please submit the revised version of all May 2011 lab results in ADaPT format to Tallahassee to be uploaded to the WACS data base.