HILLSBOROUGH COUNTY

Florida

Office of the County Administrator Frederick B. Karl

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4029 C30075

October 8, 1993

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Mr. John M. Ruddell Division Director Florida Department of Environmental Protection Division of Waste Management 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Re: Placement of Documents in the Operating Record - Hillsborough County Southeast County Landfill

Dear Mr. Ruddell:

In accordance with Federal Regulation 40 CFR 258.29(b), this correspondence serves to notify the State that the Hillsborough County Department of Solid Waste (DSW) has established an operating record for the Southeast County Landfill (SELF).

The attached matrix identifies the DSW compliance position relative to the U. S. Environmental Protection Agency's Subtitle D restrictions as well as the Florida Department of Environmental Protection's (DEP) 17-701 Phase II restrictions.

In accordance with 40 CFR 258.29(b), you will continue to be notified when any documents are place in or added to the operating record for the SELF.

Should you have any questions concerning this notification or require additional information, please contact Patricia Berry of the DSW at (813) 744-5680.

Sincerely,

Daryl H. Smith

Director

Department of Solid Waste

Attachment

xc: Patricia Berry, DSW Kim Ford, DEP

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DIVISION OF

LOCATION RESTRICTIONS	EPA SUB-TITLE D	FDEP 17-701 PHASE II	SELF
Airport Safety	Sec. 258.10 10,000 ft from runway - turbojet 5,000 ft from runway - piston type Must notify FAA if within 5 mile radius	Sec. 320(12) 10,000 ft from runway - turbojet 5,000 ft from runway - piston type Must notify FAA if within 5 mile radius	In Compliance
Floodplains	Sec. 258.11 Must demonstrate that unit will not restrict flow, reduce temporary water storage capacity of floodplain, and will not result in waste wash-out in 100 year floodplain.	Sec. 340(4) Cannot be located in an area subject to frequent and periodic flooding unless flood protection measures are in place.	In Compliance
Wetlands	 Sec. 258.12 Not allowed unless Obtain 404 permit (i.e., no practical alternative). Will not cause water quality violations. Will not violate section 307 of Clean Water Act. Will not jeopardize endangered or threatened species. Will not cause significant degradation of wetlands. Demonstrate steps to achieve no net loss of wetlands. 	Sec. 300(2) Not allowed 1. In any natural or artificial body of water. 2. Within 200 ft of natural or artificial body of water unless permanent leachate controls.	In Compliance
Fault Areas	Sec. 258.13 Cannot be located within 200 ft of fault.	Sec. 420 Foundation analysis required.	Not Applicable
Seismic Areas	Sec. 258.14 Cannot be located in seismic impact areas. unless designed to resist maximum horizontal acceleration.	Sec. 420 Foundation analysis required.	Not Applicable
Unstable Areas	Sec. 258.15 Cannot be located unless engineered to be structurally stable.	Sec. 420 Foundation analysis required.	In Compliance
Active Sink Hole	Not addressed.	Sec. 420 Prohibited.	In Compliance

LOCATION RESTRICTIONS	EPA SUB-TITLE D	FDEP 17-701 PHASE II	SELF
Within 500 ft of shallow well	Not addressed.	Sec. 300(2) Prohibited.	In Compliance
Dewatered Pit	Not addressed.	Sec. 300(2) Prohibited unless lined with leachate collection.	Not Applicable
Class I Surface Waters	Not addressed.	Sec. 300(6) Not permitted within 3,000 ft of Class I surface water.	In Compliance
Operating Personnel	Not addressed.	Sec. 500(1) Requires trained operator at all times when receiving waste. Requires at least one trained spotter at each working face when receiving waste.	In Compliance
Operating Plan	Not addressed.	Sec. 500(2) Written detailed instructions for the daily operation of the landfill.	In Compliance
No Hazardous Wastes	Sec. 258.20 Requires program to detect and exclude hazardous wastes. Requires personnel training.	Sec. 300(4), 500(6) Requires program to detect and exclude hazardous wastes. Requires personnel training. Examine at least three random loads each week.	In Compliance
Open Burning	Sec. 258.24 Not permitted.	Sec. 300(3) Not permitted.	In Compliance
Biomedical Waste	Not addressed.	Sec. 300(5) Not permitted.	In Compliance
Daily Cover	Sec. 258.21 6 inches earthen cover daily.	Sec. 500(7) 6 inches earthen cover daily except areas which receive more refuse within 18 hours.	In Compliance
Intermediate Cover	Not addressed.	Sec. 500(7) 12 inches earthen cover applied within 7 days of cell completion unless additional waste or final cover will not be applied within 180 days.	In Compliance

LOCATION RESTRICTIONS	EPA SUB-TITLE D	FDEP 17-701 PHASE II	SELF
Disease/Vectors	Sec. 258.22 Must be controlled.	Sec. 400(6)(b)6. Must be controlled.	In Compliance
Explosive Gases	Sec. 258.23 1. Not exceed LEL at property boundary. 2. Not exceed 25% LEL in facility structures.	Sec. 400(10) 1. Implement gas monitoring program. 2. Not exceed LEL at property boundary. 3. Not exceed 25% LEL in facility structure. 4. No objectionable odors of site.	The facility is surrounded on all four sides by ponds or streams. As such off-site landfill migration will not occur. However, the County should install landfill gas monitoring wells between the landfill and on-site buildings, and monitor on a routine basis. We recommend two landfill monitoring wells be installed: one at the administration building and one at the maintenance building.
Access Restrictions	Sec. 258.25 Prevent unauthorized vehicular traffic and illegal dumping.	Sec. 500(5) Prevent unauthorized entry and dumping.	In Compliance
Storm Water Management	 Sec. 258.26 - 258.27 Requires run on control system (25 year storm). Requires run off control system (24 hour, 25 year storm) Shall not violate Clean Water Act. Discharge must have NPDES permit. Shall not cause violation to 208 or 319 water quality management plans. 	Sec. 400(9) 1. Do not mix stormwater and leachate. 2. Requires run off control system. 3. Meet requirements of appropriate WMD.	In Compliance
Liquids	Sec. 258.28 Cannot dispose of bulk non-containerized liquids.	Sec. 300(9) Cannot dispose of bulk non-containerized liquids.	In Compliance

LOCATION RESTRICTIONS	EPA SUB-TITLE D	FDEP 17-701 PHASE II	SELF
Recordkeeping	Sec. 258.29 Keep records on groundwater, methane gas, inspection reports, operating records, certifications, permits, financial responsibility, closure/post closure plans.	Sec. 500(13) Keep records of all information used to develop permit, groundwater, methane gas, inspection reports, operating records, certifications, permits, financial responsibility, closure/post closure plans.	In Compliance.
Scales	Not addressed.	Sec. 500(2) Weigh all solid waste received.	In Compliance
Leachate Management	Sec. 258.28 Recirculation not allowed unless: 1. MSWLF is designed with a composite liner and leachate collection system.	 Sec. 500(8) Maintain levels, monitor, sample, analyze, and report. Measure and record leachate quantities. Prepare contingency plan. Maintain recording rain gage. 	In Compliance (will stop recirculation until state program is approved by EPA)
Litter Control	Not addressed.	Sec. 500(7) Maintain litter policing operation.	In Compliance
Erosion Control	Not addressed.	Sec. 500(7) Maintain erosion control measures.	In Compliance
Equipment	Not addressed.	 Sec. 500(11) Maintain sufficient equipment to ensure proper operation. Maintain arrangement for reserve equipment. Have adequate communications equipment. Have personnel shelter and sanitary facilities and first aid equipment. Maintain dust control methods. Maintain fire protection capabilities. Maintain litter control devices. Maintain adequate signage. 	In Compliance
Roads	Not addressed.	Sec. 500(12) Maintain adequate all weather road system.	In Compliance

LOCATION RESTRICTIONS	EPA SUB-TITLE D	FDEP 17-701 PHASE II	SELF
Design Criteria	Sec. 258.40 New MSWLF Units & Lateral Expansions 1. In accordance with a design approved by the Director of an approved State, or 2. With a composite liner and leachate collection system to maintain leachate depth less than 30 cm depth over liner. 3. Compliance point no more than 150 meters from waste management unit and on land owned by owner of MSWLF unit.	 Sec. 400 New MSWLF Units & Lateral Expansions Composite liner (60 mil synthetic over clay) and leachate collection system to maintain leachate depth to less than 1 inch to 12 inches depending upon clay thickness and permeability. Double 60 mil synthetic over prepared 6 inch 1 x 10-5 cm/sec. Leachate collection system to maintain leachate depth less than 12 inches over primary liner and no saturation. Compliance point no more than 100 feet from the waste management unit. Extensive design, construction, and QA/QC requirements. Extensive requirements for leachate storage tanks and impoundments. Extensive requirements for surface water management systems. Extensive requirements for gas control systems. Extensive requirements for landfill gas recovery systems. 	SELF is an existing MSWLF unit; therefore, these requirements are not applicable.
		Sec. 430 Vertical Expansion of Landfills, provided that the vertical expansion will not cause or contribute to leachate leakage from the existing landfill nor adversely affect closure design of the existing facility; 1. Vertical expansion over lined landfills does not require interface liner. 2. Side slopes steeper than 6 to 1 require single 60 mil synthetic plus leachate removal systems. 3. C/D must comply with 17-701.730 and 17-701.803. 4. Composting must comply with 17-709.	

LOCATION RESTRICTIONS	EPA SUB-TITLE D	FDEP 17-701 PHASE II	SELF
Groundwater Monitoring Applicability	Sec. 258.50 May be suspended provided it can be demonstrated that there is no potential for migration of hazardous constituents.	Sec. 510(1) No exception.	In Compliance
Groundwater Monitoring Systems	 Sec. 258.51 Wells to represent background water quality. Wells to represent the water quality at the compliance point(s). Wells, piezometers, and other measurement, sampling and analytical devices shall be located based upon site specific technical information. 	 Sec. 510(3) At least one background well. Detection wells shall be located downgradient no more than 50 feet from the waste boundary. Compliance wells shall be located immediately outside the compliance line of the zone of discharge. Well spacing shall be set at no greater than 500 feet apart across the downgradient direction of groundwater flow, and no greater than 1500 feet apart across the upgradient direction of groundwater flow. Discharges from all surface waters that may be affected by a contaminant release shall be monitored. Leachate shall be monitored. 	Additional groundwater monitoring wells likely will be required by the FDEP upon permit renewal to meet the minimum spacing requirements.
Groundwater Sampling and Analysis	 Sec. 258.53 - 258.55 Detection monitoring required for Appendix I, may be modified. Sampling at least semi-annually. Site may authorize annual sampling. Must establish assessment monitoring plan if constituents are statistically different than background. 	 Sec. 510(4)-510(6) Detection wells sampled quarterly. Leachate sampled quarterly. Discharge of surface water sampled quarterly. Compliance wells sampled quarterly unless indicator parameters or leachate parameters are detected in detection wells in concentrations which are statistically significant and above background water quality or in concentrations above water quality standards. 	The County will have to monitor more constituents to meet EPA and the new FDEP requirements. The frequency of the sampling events still is being discussed between EPA and FDEP.

LOCATION RESTRICTIONS	EPA SUB-TITLE D	FDEP 17-701 PHASE II	SELF
Assessment Monitoring and Corrective Action	Sec. 258.55 - 258.58 1. Assessment Monitoring Program. 2. Assessment of Corrective Action. 3. Selection of Remedy. 4. Implementation of Corrective Action.	Sec. 510(7) 1. Assessment monitoring. 2. Contamination Assessment Plan. 3. Implementation of CAP and prepare RAP. 4. Initiate corrective actions.	In Compliance
Closure Criteria	 Sec. 258.60 Final cover system to minimize infiltration and erosion. Infiltration layer 18 inches of earthen material that has a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than 1 x 10 -5 cm/sec, whichever is less, and An erosion layer no less than 6 inches thick to sustain vegetation. The director of an approved State may approve an equivalent alternative final cover. Written Closure Plan and notification. 	 Sec. 600(5) Final cover system to minimize infiltration and erosion (lined landfills and Class III landfills). a. Barrier layer 18 inches thick with a maximum permeability of 1 x 10 -5 cm/sec. b. Final layer 18 inches thick to sustain vegetation and control erosion. Final cover system to minimize infiltration and erosion (unlined Class I and Class II landfills). a. Barrier layer 18 inches thick with a permeability of 1 x 10 -7 cm/sec or less. b. Final layer 18 inches thick to sustain vegetation and control erosion. Differing soil layer hydraulic properties may be used for barrier soil layer which minimize infiltration to an equivalent degree as "1a" above, provided that the thickness is at least 12 inches. Written Closure Plan and Notification. 	FDEP: In Compliance 1. Barrier layer 18 inches thick with a permeability of 1x10 ⁻⁷ cm/sec. 2. Final layer 6 inches thick to sustain vegetation and control erosion. Final layer must be modified to increase the topsoil depth to 18 inches (i.e., add 12 inches to current design). EPA: The bottom liner has an estimated hydraulic conductivity of 1.3 X 10 ⁻⁸ cm/sec. A more impermeable layer would be required to meet EPA final cover requirements.
Post Closure Care	Sec. 258.61 During 30 year post closure period, owner must maintain: 1. Final cover. 2. Groundwater monitoring. 3. Gas monitoring. 4. Leachate management.	Sec. 620 Monitor and maintain the facility in accordance with approved closure plan for 30 years after closure.	In Compliance

LOCATION RESTRICTIONS	EPA SUB-TITLE D	FDEP 17-701 PHASE II	SELF
Financial Assurance	 Sec. 258.70 - 258.74 Written estimate for closure 1. Third party closure of largest area requiring closure. 2. Annually adjust estimate. 3. Annual adjust financial assurance. Written estimate for post closure 1. Third party post closure care. 2. Annually adjust estimate. 3. Annually adjust financial assurance. 	 Sec. 630 Financial mechanism must be fully funded at least 60 days prior to acceptance of solid waste. Written estimate for closure a. Same as Sub-Title D. 	In Compliance
Class III Landfill	Not addressed.	Sec. 340(3) Fill permit required.	Not Applicable
Hydrogeological Investigation	Not addressed	Sec. 410 Detailed requirements.	In Compliance
Geotechnical Investigation	Not addressed.	Sec. 420 Detailed requirements.	In Compliance
Special Waste Handling	Not addressed.	Sec. 520 Detailed requirements.	In Compliance
Volume Reduction Plants	Not addressed.	Sec. 700 Full permit required.	No Applicable
Mining of Solid Waste	Not addressed.	Sec. 620(5) Full permit required.	Not Applicable
C & D Disposal	Not addressed.	Sec. 730 General permit required.	In Compliance
Transfer Station	Not addressed.	Sec. 801 General permit required.	Not Applicable
Land Application of Grade II Sludge	Not addressed.	Sec. 802 General permit required.	Not Applicable
Shredded Waste	Not addressed	Sec 520(3) 1. Shall pass 3" screen	In Compliance (Tire shredding facility)