

## Florida Department of Environmental Protection

Central District 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767 Rick Scott Governor

Jennifer Carroll Lt. Governor

Herschel T. Vinyard Jr. Secretary

OCD-SW-12-325

August 22, 2012

<u>E-Mail</u> lmarion@co.volusia.fl.us

Mr. Leonard Marion Volusia County Solid Waste Division 3151 East New York Ave. DeLand, Florida 32724

> Volusia County – SW WACS # 27540 Tomoka Farms Road Landfill – North Cell, Phase II, Class I Disposal Area First Request for Additional Information Permit Application No. SC64-0078767-029

Dear Mr. Marion:

Carlo Lebron, P.E., of HDR Engineering, Inc., submitted on your behalf, "Tomoka Farms Road Landfill, North Cell – Phase II, Class I Construction Permit Renewal Application." It was dated August 1, 2012 and received August 2, 2012. We have assigned Permit No. SC64-0078767-029 to the application.

The renewal application was timely filed as defined in Rule 62-4.090, F.A.C. The existing permit (SC64-0078767-022) shall remain in effect until this renewal application has received final action by the Department.

The application is incomplete. Please provide the information listed on the attached sheet promptly. Evaluation of your application will 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.

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If you have any questions, please contact Kim Rush at (407) 897-4314 or by e-mail at <a href="mailto:kim.rush@dep.state.fl.us">kim.rush@dep.state.fl.us</a>.

Sincerely,

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

FTL/kr

Enclosure

cc: Carlo Lebron, P.E. – HDR Engineering, Inc., <u>carlo.lebron@hdrinc.com</u> Junos Reed, Volusia County, jreed@co.volusia.fl.us Note that all references to "Report" in the following text refer to the document entitled, "Tomoka Farms Road Landfill, North Cell – Phase II, Class I Construction Permit Renewal Application," with supporting documents prepared by: Carlo Lebron, P.E., dated August 1, 2012.

- 1. The Department understands this construction permit renewal to include a redesign to the leachate collection system. The leachate collection system changes are summarized as:
  - a. The pipe trench walls will be sloped instead of vertical.
  - b. The pipe trench aggregate covered in woven geotextile will protrude 1 foot above the cell floor.
  - c. Eliminates the six 12" diameter pipes in the leachate sump.
  - d. Changes the leachate sump footprint shape and size.
  - e. Adds a leachate monitoring station containment pad.
  - f. Changes the end of the leak detection cleanout pipe from a vertical cleanout angle to a sideslope cleanout angle.

Is the Departments summary of the leachate system changes accurate and complete?

- 2. Per sheet 00C-003 Pipe Trench Section, the aggregate and woven geotextile in the pipe trench will protrude one foot above the sand drainage layer into the first layer of waste. How will this one foot high by approximately 3 foot wide section through the middle of the cell not get damage by the equipment dumping and spreading the first layer of waste?
- 3. Sheet 00C-03, Leachate Collection Sump (Plan): It appears there is a leachate containment pad below the leachate detection riser pipe and somewhat below the leachate collection riser pipe. Sheet 00C-04, Leachate Monitoring Station shows the leachate collection riser pipe outside of the leachate containment pad. Neither drawing gives details about the pad.
  - a. Is the purpose of the leachate containment pad to provide containment for any possible leachate spills from the leachate piping systems outside of the lined footprint?
  - b. If so, all leachate piping system openings and valves outside of the lined footprint should be within the containment pad. What are the construction details (for example, bottom of pad, curbing, coating)? Please revise sheet 00C-04.
  - c. If not, what is the purpose of the containment pad? How will spillage from activities, such as, replacing the pump from the leachate collection riser, be contained?
- 4. Section D.12, page 6, History of FDEP Enforcement Activities refers to the 2007 Construction Permit Renewal Application and subsequent Request for Additional Information. Please note, Consent Order – OGC File No. 07-2701 dated February 12, 2008, has been issued after the referenced 2007 documents and should be included in future reporting of FDEP Enforcement Activities.
- 5. Section N.2, page 20, Gas Monitoring states "No changes to the gas monitoring are proposed for this construction permit renewal permit application." Provide a drawing, or revise sheet 00C-01, to show all locations where gas migration monitoring is being performed (MW-1, MW-2, MW-3, MW-4, MW-5, MW-7, MW-8, maintenance building, scale house and the administration building). The Department will then review the drawing to determine if gas

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migration monitoring is sufficient to ensure any off-site gas migration will be captured in the monitoring plan.

6. Please note, the most recently approved closure cost estimate, dated December 6, 2011, does not include closure costs for Phase II. As required by Rule 62-701.630(2)(b), F.A.C., proof of financial assurance for Phase II must be provided to the Department at least 60 days prior to the initial receipt of waste. To meet the 60-day requirement, submit a new detailed cost estimate for Phase II at least 90 days prior to the planned initial receipt of waste. The Central District will review the new cost estimate as quickly as possible so that the approved amount can be funded before the 60-day time limit.