



11500 43rd Street North, Clearwater, Florida 33762

June 7, 2013

Mr. F. Thomas Lubozynski, P.E.
Waste Program Administrator
Solid and Hazardous Waste Program
Florida Department of Environmental Protection, Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Re: 18th Semi-Annual Water Quality Monitoring Event - Notice of Exceedances
J.E.D. Solid Waste Management Facility (JED Facility)
Omni Waste of Osceola County, LLC
FDEP Permit No. SO49-0199726-017 & SC49-0199726-017
WACS Facility ID: 89544

Dear Mr. Lubozynski:

The purpose of this letter is to inform the Florida Department of Environmental Protection (FDEP) that monitoring parameters exceeded the Department's water quality standards in some of the groundwater monitoring wells at the JED Facility during the 18th semi-annual water quality monitoring event performed in May 2013. In accordance with 62-701.510(6)(a), Florida Administrative Code (F.A.C.), the Department is being notified of these findings within 14 days of receipt of the analytical laboratory results. A brief summary of the exceeded monitoring parameters are presented below and results provided on the attached Table.

Ammonia - ammonia was reported above the groundwater cleanup target level (GCTL) of 2.8 mg/L in twelve (12) of the shallow groundwater monitoring wells (i.e., MW-1A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 11A, 19A, and 23A). Ammonia has been detected in all of these wells during previous sampling events and has exceeded the GCTL for ammonia in most all of these wells. Based on this historical data, these wells will not be re-sampled for ammonia and the reported concentrations will be considered as representing current conditions.

Arsenic – arsenic was reported above the GCTL of 10 µg/L in groundwater monitoring well MW-13A (12.9 µg/L). Arsenic has been consistently detected above the GCTL in MW-13A since first being sampled in January 2004. Based on this data, MW-13A will not be re-sampled for arsenic and the reported concentration will be considered as representing current conditions.

Benzene – benzene was reported above the GCTL of 1µg/L in eleven (11) of the shallow groundwater monitoring wells (MW-1A, 3A, 4A, 5A, 6A, 8A, 9A, 10A, 11A, 12A, and 13A) and one (1) of the intermediate wells (MW-11B). Benzene has been detected above the GCTL in these wells during previous monitoring events at similar concentrations. Based on this historical data, these wells will not be re-sampled and the reported concentrations will be considered as representing current conditions.

Chloride – chloride was reported above the GCTL of 250 mg/L in monitoring well MW-1A (412 mg/L). MW-1A will not be re-sampled for chloride and the reported concentration will be considered as representing current conditions.

Iron – with the exception of MW-20A and MW-1B, iron was detected above the GCTL of 300 µg/L in all shallow, intermediate and deep monitoring wells sampled during this water quality monitoring event with concentrations ranging from 530 µg/L to 40,200 µg/L. The concentrations are consistent with previous results and will not be re-sampled and the reported concentrations will be considered as representing current conditions.

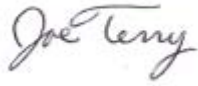
Sodium – sodium was reported above the GCTL of 160 mg/L in monitoring well MW-1A (201 mg/L). MW-1A will not be re-sampled for sodium and the reported concentration will be considered as representing current conditions.

Total dissolved solids (TDS) – TDS concentrations were reported above the GCTL of 500 mg/L in shallow groundwater monitoring wells MW-1A (1,160 mg/L), MW-8A (769 mg/L) and MW-19A (760 mg/L) and intermediate monitoring well MW-9B (681 mg/L). The reported concentrations will be considered as representing current conditions.

Total Phenols – Total phenols were detected above the GCTL of 10 µg/L in all of the monitoring wells sampled this event. Concentrations ranged from 14 to 69 µg/L. These wells will not be resampled for total phenols and the reported concentrations will be considered as representing current conditions. Please note that this is the first semi-annual water quality monitoring event that included total phenol analysis for the intermediate wells; and consequently, the only basis for comparison are the initial sampling events conducted in 2003 for the Phase I monitoring well network (clusters MW-1 through MW-13) and 2007 for the Phases II & III network (clusters MW-16 through MW-23). In addition phenolic compounds were reported in all of the laboratory method blank samples at concentrations ranging from 7 to 23 µg/L.

If you have any questions or need additional information, please contact the undersigned at (813) 943-8633.

Sincerely,

A handwritten signature in cursive script that reads "Joe Terry".

Joe Terry
Environmental Manager

cc: M. Kaiser, WSI
G. DePradine, FDEP

Table 3

**SUMMARY OF GROUNDWATER ANALYTICAL DATA
18th SEMI-ANNUAL WATER QUALITY MONITORING EVENT
J.E.D. SOLID WASTE MANAGEMENT FACILITY**

Well ID	1,4-Dichlorobenzene	Benzene	Chlorobenzene	Ethylbenzene	Total Xylenes	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Iron	Lead	Mercury	Nickel	Selenium	Sodium	Vanadium	Zinc	Ammonia	Chloride	Nitrate as N	Total Phenols*	TDS	
	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (mg/L)	GCTL (µg/L)	GCTL (µg/L)	GCTL (mg/L)	GCTL (mg/L)	GCTL (mg/L)	GCTL (µg/L)	GCTL (mg/L)	
	75	1	100	700	10,000	10	2,000	4	5	100	420	1,000	300	15	2	100	50	160	49	5,000	2.8	250	10	10	500	
MW-1A	2	5.1	0.26	0.55	2.11	1.4	115	0.04	0.1	5.9	1.9	0.4	7,980	0.17	0.02	3.4	2	201	6.9	6.3	8.38	412	0.03	21	1,160	
MW-1B	0.16	0.21	0.16	0.21	0.31	0.5	6.6	0.04	0.1	0.5	0.05	0.3	200	0.12	0.02	0.5	1.1	8.02	0.4	1.6	0.344	9.85	0.03	18	66	
MW-2A	0.16	0.21	0.16	0.21	0.31	0.5	1.4	12	0.04	0.1	1.8	2.2	0.4	22,800	0.19	0.02	0.6	1.1	19.7	1.8	2.6	0.711	25.9	0.03	18	145
MW-2B	0.16	0.21	0.16	0.21	0.31	0.5	8.1	0.04	0.1	0.2	0.2	0.3	730	0.12	0.02	0.5	1.1	5.5	0.3	1.6	0.094	8.78	0.03	18	34	
MW-3A	6.6	8.8	1	1.4	0.4	0.5	31.7	0.04	0.1	0.2	1.6	0.5	8,140	0.23	0.02	0.5	1.1	26.2	2.7	1.6	8.75	79.5	0.03	22	175	
MW-3B	0.16	0.21	0.16	0.21	0.31	0.5	26.5	0.04	0.1	1.3	0.2	0.3	530	2.09	0.02	0.5	1.1	6.51	2.6	1.6	0.091	9.21	0.15	18	46	
MW-4A	0.16	4	0.16	0.21	0.31	0.5	39.1	0.04	0.1	0.9	0.6	0.3	2,630	0.12	0.02	0.5	1.1	25.0	0.5	3.4	11.7	73.7	0.03	22	160	
MW-4B	0.16	0.21	0.16	0.21	0.31	0.7	18.3	0.1	0.1	0.2	0.2	0.3	1,360	0.12	0.02	0.5	1.1	9.08	0.3	1.6	0.295	19.2	0.03	19	72	
MW-5A	0.16	2	0.16	0.21	0.31	0.5	34.7	0.04	0.1	0.8	0.9	0.3	2,380	1.15	0.02	0.6	1.1	27	1.5	1.6	7.79	65.9	0.03	23	480	
MW-5B	0.16	0.21	0.16	0.21	0.31	0.7	77.6	0.39	0.1	0.2	0.7	0.3	1,740	0.12	0.02	0.8	1.1	20.7	1.4	1.6	0.471	66.4	0.03	23	126	
MW-6A	0.16	3.1	0.16	0.26	0.31	0.5	6.1	0.04	0.1	0.7	0.9	0.6	40,200	0.32	0.02	0.6	1.1	55.1	2.5	1.6	4.88	111	0.03	15	271	
MW-6B	0.16	0.21	0.16	0.21	0.31	0.5	26.1	0.04	0.1	0.4	0.2	0.3	1,220	0.12	0.02	0.5	1.1	9.08	1	2	0.102	17.3	0.03	14	58	
MW-7A	0.16	0.21	0.16	0.21	0.31	0.5	31.1	0.04	0.1	0.5	1.4	0.3	19,800	0.12	0.02	0.5	1.1	21.8	2	1.6	5.15	33.7	0.03	22	268	
MW-7B	0.16	0.21	0.16	0.21	0.31	0.7	210	0.14	0.1	0.2	1.5	0.3	8,560	0.12	0.02	1.2	1.1	35	1	1.9	0.317	64.8	0.03	16	247	
MW-8A	0.65	2.2	0.26	0.21	0.27	0.8	39.3	0.36	0.1	2.5	3.4	0.3	10,000	0.12	0.02	0.6	1.1	27.9	6	1.7	5.59	32.1	0.03	69	769	
MW-8B	0.16	0.21	0.16	0.21	0.31	0.5	76.9	0.1	0.1	1.9	0.5	0.4	3,130	1.11	0.02	0.6	1.1	12.7	3.5	1.6	0.211	43.5	0.03	32	116	
MW-9A	0.26	2.3	0.16	0.21	0.21	0.9	32	0.04	0.1	1.8	2.8	0.6	11,100	0.12	0.02	0.3	1.1	29.7	2.5	3.5	21.6	25.8	0.03	37	489	
MW-9B	0.16	0.21	0.16	0.21	0.31	0.7	105	1.04	0.1	1.3	7.1	0.3	26,600	0.12	0.02	2.7	1.1	53.1	4.5	4.8	0.762	37.8	0.03	38	681	
MW-10A	0.16	4.7	0.16	0.21	2.88	2.2	46.7	0.04	0.1	1.8	1	0.3	6,070	0.12	0.02	3.3	1.1	17	2.8	1.6	11.6	19.1	0.03	31	286	
MW-10B	0.16	0.21	0.16	0.21	0.31	0.8	104	0.36	0.1	0.8	4.2	0.3	6,650	0.12	0.02	1.3	1.1	56.8	1.8	1.6	1.43	46.9	0.03	17	333	
MW-11A	0.16	8.1	0.16	0.98	1.04	3.5	16.8	0.04	0.1	3.2	0.3	0.3	9,320	0.2	0.02	1.1	1.1	37.6	3.7	2	5.67	57.3	0.03	38	237	
MW-11B	0.16	3.7	0.16	0.21	0.14	0.7	32.6	0.07	0.1	1.5	0.2	0.3	1,030	0.12	0.02	0.5	1.1	27.7	2.5	1.6	0.086	25.7	0.03	32	131	
MW-12A	0.16	3.8	0.16	0.21	0.31	3.7	16.3	0.06	0.1	1.7	1.1	0.3	27,300	0.12	0.02	1.4	1.1	11.4	1.9	1.6	1.48	20.1	0.03	33	149	
MW-12B	0.16	0.21	0.16	0.21	0.31	0.5	36.1	0.05	0.1	0.7	0.2	0.3	1,390	0.12	0.02	0.5	1.1	10.2	1.1	1.6	0.146	27.1	0.03	28	86	
MW-13A	0.16	3.4	0.16	0.21	0.52	12.9	13.4	0.07	0.1	3.9	0.2	0.3	19,800	0.12	0.02	0.5	1.1	16.1	4.5	1.6	1.47	26.9	0.03	36	147	
MW-13B	0.16	0.21	0.16	0.21	0.31	0.5	20.7	0.06	0.1	0.8	0.4	0.3	1,940	0.12	0.02	0.5	1.1	14.6	0.3	1.6	0.174	33.9	0.03	31	94	
MW-16A	0.16	0.21	0.16	0.21	0.31	0.8	10.8	0.04	0.1	1.9	0.2	0.3	620	0.2	0.02	0.5	1.1	2.04	3.4	1.6	0.57	2.76	0.03	28	44	
MW-16B	0.16	0.21	0.16	0.21	0.31	0.6	24.9	0.04	0.1	2.6	0.2	0.8	1,310	2.11	0.02	0.6	1.1	4.82	2.8	1.6	0.123	4.18	0.03	26	61	
MW-16C	0.16	0.21	0.16	0.21	0.31	0.5	13.1	0.04	0.1	0.4	0.03	0.3	810	0.12	0.02	0.5	1.1	12	0.5	1.6	0.125	20	0.03	31	79	
MW-19A	0.16	0.21	0.16	0.21	0.31	5.6	35.8	0.56	0.1	28	1.4	2.5	6,220	12	0.17	4.4	5.6	21.6	28.8	1.6	11.8	15.9	0.23	42	760	
MW-19B	0.16	0.21	0.16	0.21	0.31	0.7	30.8	0.04	0.1	1.4	0.2	0.6	840	1.3	0.02	0.5	1.1	18.2	1.8	1.6	0.106	33.9	0.03	31	105	
MW-20A	0.16	0.21	0.16	0.21	0.31	0.5	22	0.04	0.1	0.6	0.3	0.3	250	0.84	0.02	1.6	1.8	3.9	6.5	2.1	0.007	4.95	0.23	20	368	
MW-20B	0.16	0.21	0.16	0.21	0.31	0.5	58.2	0.17	0.1	7	0.3	1.6	1,440	2.93	0.04	1.7	2.5	15.8	10	4.1	0.197	24.9	0.03	25	131	
MW-21A	0.16	0.21	0.16	0.21	0.31	0.5	107	0.17	0.41	0.7	2	0.3	650	0.72	0.02	2.1	1.6	9.45	5.5	5.1	0.148	19.3	1.18	19	344	
MW-21B	0.16	0.21	0.16	0.21	0.31	0.5	12.1	0.04	0.1	0.8	0.2	0.3	1,960	0.38	0.02	0.5	1.1	15.5	0.4	1.6	0.147	26	0.03	18	86	
MW-22RA	0.16	0.21	0.16	0.21	0.31	0.6	7.5	0.04	0.1	1.6	0.3	0.3	1,830	0.12	0.02	0.5	1.1	27.5	2.6	1.6	0.213	38	0.03	16	158	
MW-22RB	0.16	0.21	0.16	0.21	0.31	0.5	53.9	0.18	0.1	7.7	0.9	0.9	2,110	4.05	0.02	2.6	1.1	16.6	9.5	5	0.122	27.5	0.03	18	141	
MW-23A	0.16	0.41	0.16	0.21	0.31	0.5	13.7	0.04	0.1	2.3	0.4	0.4	1,630	0.42	0.02	1.1	1.1	15.4	4	1.6	4.9	22	0.14	21	245	
MW-23B	0.16	0.21	0.16	0.21	0.31	0.6	103	0.18	0.1	0.3	0.8	0.3	2,350	0.12	0.02	0.5	1.1	54.5	1.5	5.5	2.1	56.3	0.15	22	258	

NOTES: Only parameters with detections above the Method Reporting Limit are shown (with the exception of total phenols, see note below).

i	The Reported Value is between the Laboratory Method Detection Limit (MDL) and the Laboratory Practical Quantitation Limit (PQL).
	Detect
	Exceeds GCTL

u = indicates that the compound was analyzed for but not detected at or above the value shown

v = indicates that the analyte was detected in both the sample and the associated method blank

* = Total Phenol analysis by EPA Method 420.4. MDL (5 µg/L) is below GCTL; however the PQL (50 µg/L) is over the GCTL and therefore given an i qualifier.