



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Mr. John Power, Solid Waste Facility Manager
Pasco County Utilities
7530 Little Road
New Port Richey, Florida 34654

April 18, 2008

**Re: West Pasco Class III Landfill
Pending Permit No.: 26254-001-SO/T3, Pasco County
3rd Request for Additional Information**

Dear Mr. Power:

This is to acknowledge receipt of the additional information dated October 5, 2007 (received October 8, 2007) and dated March 20, 2008 (received March 21, 2008); in support of a permit renewal application to operate the West Pasco Class III landfill.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes.

Your application for a permit is incomplete. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

Please be advised that the submittals referenced above were largely unresponsive to the Department's May 2, 2007 request for information. Please note that it has been 437 days since this permit application filed with the Department. In the event that a complete and timely response to this request for information is not received by the date listed at the end of this letter, the Department may deny the pending application.

GENERAL:

1. The requested information and comments below do not necessarily repeat the information submitted by the applicant. However, every effort has been made to concisely refer to the section, page, drawing detail number, etc. where the information has been presented in the original submittal.

2. Please submit **4 copies** of all requested information. Please specify if revised information is intended to supplement or replace previously submitted information. Please submit all revised plans and reports as a complete package. For revisions to the narrative reports, deletions may be struckthrough (~~struckthrough~~) and additions may be shaded **shaded** or similar notation method. This format will expedite the review process. Please include revision date on all revised pages.

3. Please provide a summary of all revisions to drawings, and indicate the revision on each of the applicable plan sheets. Please use a consistent numbering system for drawings. If new sheets must be added to the original plan set, please use the same numbering system with a prefix or suffix to indicate the sheet was an addition, e.g. Sheet 1A, 1B, P1-A, etc.

4. Please be advised that although some comments may not explicitly request **additional information, the intent of all comments shall be to request revised calculations, narrative, technical specifications, QA documentation, plan sheets, clarification to the item, and/or other information as appropriate.**

The following information is needed in support of the solid waste application [Chapter 62-701, Florida Administrative Code (F.A.C.)].

1. As part of the permit review process for the "original permit application in 1988 and subsequent permit renewal application in 1995," additional information in support of these permit applications, which may or may not have replaced originally submitted information was provided. Therefore, generic references to "Previously Submitted Information" do not provide adequate references to previously submitted information in accordance with Rule 62-701.320(10)(c), F.A.C. Previously provided information which is still valid may be referenced, but must be specifically referenced (by document name and date, submittal date, author, and specific section, page, and/or plan number) in order to evaluate its current validity. As previously requested, where "Previously Submitted Information" is noted, please provide specific references to the previously provided information (by document name and date, submittal date, author, and specific section, page, and/or plan number) that the applicant is utilizing in support of this permit application.

2. **Rule 62-701.320(7)(b), F.A.C. Application Form #62-701.900(1):** Please address the following comments regarding the permit application form and provide an application form with the revised information, where applicable:

a. Disposal Facility General Information - Part B.13: Please address the comment in John Morris' April 18, 2008 memorandum (attached) regarding this information. You may call Mr. Morris at (813) 632-7600, extension 336, to discuss the items in his memorandum.

b. Landfill Permit Requirements - Part F4 and F5: Please provide replacement pages to the application form that reference the revised information submitted in support of Parts F4 and F5 and to address comments regarding Attachment 5 below.

c. Hydrogeological Investigation Requirements - Part I: Please address the comments in John Morris' April 18, 2008 memorandum (attached) regarding this information. You may call Mr. Morris at (813) 632-7600, extension 336, to discuss the items in his memorandum.

d. Water Quality and Leachate Monitoring Requirements - Part M: Please address the comments in John Morris' April 18, 2008 memorandum (attached) regarding this information. You may call Mr. Morris at (813) 632-7600, extension 336, to discuss the items in his memorandum.

e. Landfill Final Closure Requirements - Part P.1(a) through (c): The information provided in Section 3.4 of the Engineering Report does not appear to address the information required by Parts P.1.(a) through P.1.(c). Please provide replacement pages to the application form that reference the revised information submitted in support of Parts P.1.(a) through P.1.(c).

f. Landfill Final Closure Requirements - Part P.2(b)(1)through(3)and (5) through (6):

1) The previously submitted Closure Plan does not comply with the requirements of closure in Rule 62-701.600 F.A.C. (e.g., the proposed 18-inch clay cap does not meet current closure requirements for a landfill with a geosynthetic liner system). Please provide replacement pages to the application form that reference the revised information submitted in support of Parts P.2.(b)(1) through P.2.(b)(3).

2) The revised Long-Term Care Plan was not provided by Pasco County under separate cover as indicated in Parts P.2.(b)(5). Please provide replacement pages to the application form that reference the revised information submitted in support of Part P.2.(b)(5).

3) The revised financial assurance information was not provided by Pasco County under separate cover as indicated in Parts P.2.(b)(6). Please provide replacement pages to the application form that reference the revised information submitted in support of Part P.2.(b)(6).

Engineering Report (Rule 62-701.730(2)(a), F.A.C.)

3. Section 3.4.: The previously submitted and currently permitted construction/operation drawings for this facility do not provide for a 40-mil LLDPE and 24-inch protective soil layer final cover system. Please verify and provide revised closure drawings accordingly.

Landfill Operation Plan (Rule 62-701.500, F.A.C.)

Please provide the following additional information and revisions to the Operation Plan. Please provide a comprehensive Operation Plan that incorporates the responses to these comments and include new revision dates.

4. Section 2.b. - Contingency Operations for Emergencies:

a. The explanation provided for why wastes resulting from a natural disaster or other emergency will be stockpiled on an area that is not lined, when there are available areas at the facility that are lined and have minimal impact to the environment (to allow for waste sorting) is not acceptable. Please revise this section to either describe the temporary leachate containment system that will be provided on the limerock pad to prevent leachate runoff from the waste or to indicate that the waste will be temporary stored in the available lined areas of the Class III landfill.

5. Section 2.c. - Controlling Types of Waste Received at the Landfill:

a. Rule 62-701.500(1), F.A.C. requires that a Class III landfill have at least one trained spotter at each working face at all times when the landfill receives waste. Therefore daily spotting cannot occur at the scale house. Please provide specific procedures (e.g., temporary storage location, type of storage containers, size of storage containers, maximum storage time, etc.) for the daily spotting of incoming waste and the management of any unacceptable wastes, hazardous wastes or medical wastes that are unintentionally received by the facility at the working face.

6. Section 2.f. - Method and Sequence of Filling Waste:

a. The description of final cover in this section is inconsistent with that in Section 3.4 of the Engineering Report. Please verify and revise this section, as appropriate.

7. Figure 2: Figure 2 appears to show the fill sequence for Cell 1 and the first few lifts in Cell 2. Therefore, the fill sequence for Cells 2, 3, and 4 are not identical to Figure 2. As previously requested, please provide fill sequences for the remainder of Cells 2, 3 and 4.

8. Figure 4: The October 5, 2008 response letter indicates that when waste is placed in Cells 2 and 3, Valves 2 and 3 will be closed. Please explain how the leachate collected in both leachate collection lines in each cell will reach the respective leachate holding tank when Valves 2 and 3 are closed.

9. Attachment 2, Financial Assurance: The requested information was not provided under separate cover by Pasco County as indicated. Please address the comments in the Department's May 17, 2007 letter (attached) regarding the financial assurance cost estimates.

10. Attachment 3, Jet Cleaning Report: Since the results of cleaning for the leachate collection lines are not available, please conduct an additional jet cleaning and provide a report describing the jet cleaning activities and results (i.e., specific length of each line cleaned, type of cleaning, equipment used, general conditions of lines, leachate collected, etc.).

11. Attachment 5, Topographic Survey and Landfill Capacity Calculations:

a. Topographic Survey: Please provide a current topographic survey of the facility (including Cells 1-4) that identifies the cell boundaries for each cell.

b. Calculation Form:

1) There appear to be various typographic errors throughout this form. Please verify and revise as appropriate.

2) *Section 3.0(b)*: Please provide revised calculations based on the topographic survey provided in response to Comment #11.a.

3) *Section 4.0(b)*: Please provide revised calculations using the actual volume filled based on the topographic survey provided in response to Comment #11.a., rather than this assumption.

4) *Section 4.0(c)*: Please provide revised calculations using the actual volume filled based on the topographic survey provided in response to Comment #11.a., rather than this assumption.

5) *Section 4.0(d)*: The assumption that all cells have generally identical foot print areas appears to be inconsistent with the as-built drawings for the facility. Please verify and revise the calculations accordingly.

6) *Section 4.0(f)*: The assumption that the permitted elevation is +75 ft NGVD appears to be inconsistent with the permit and operation drawings for the facility. Please verify and revise the calculations accordingly.

7) *Section 4.0(g)*: The assumption that the base elevation is +55 ft NGVD appears to be inconsistent with the as-built drawings for the facility. Please verify and revise the calculations accordingly.

8) *Section 5.0*: The cell dimensions depicted on Diagram 1 appear to be inconsistent with the as-built drawings for the facility. Please verify and revise the calculations accordingly.

9) *Section 5.0*: Please revise all the assumptions and calculations in Section 5.0, as appropriate, based on all your responses to Comment 11.b.

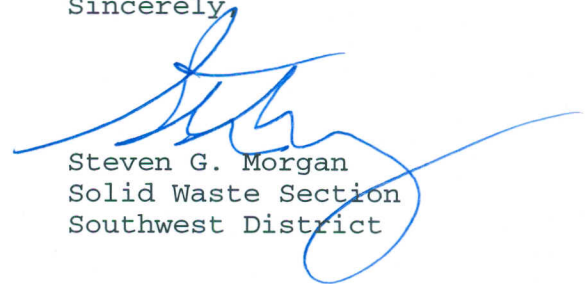
10) *Section 5.0*: Please provide the supporting information utilized in support of the assumed 10 ton/day acceptance rate.

This staff assessment is preliminary and is designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the Department and may be subject to revision pursuant to additional information and further review.

Please respond by **June 2, 2008**, responding to all of the information requests and indicating when a response to any unanswered questions will be submitted. If the response will require longer than the above schedule, you should develop an alternate timetable for the submission of the requested information for Department review and consideration. If the Department does not receive a timely, complete response to this request for information, the Department may issue a final order denying your application. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant may reapply as soon as the requested information is available.

Please provide **4 copies** of your response to this letter as one complete package. If there are points that must be discussed and resolved or you would like to set up a meeting to discuss this letter and subsequent submittals, please contact me at (813) 632-7600 ext. 385.

Sincerely,



Steven G. Morgan
Solid Waste Section
Southwest District

Attachments

Cc: Aamod Sonawane, P.E., Camp Dresser & McKee Inc. (CDM), 1715 N. Westshore Blvd., Suite 875,
Tampa, Florida 33607
Fred Wick, FDEP Tallahassee
John Morris, P.G., FDEP Tampa
Steve Morgan, FDEP Tampa
Susan Pelz, P.E., FDEP Tampa



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Secretary

Mr. John Power Solid Waste Facility Manager
Pasco County Utilities Services
7530 Little Road, S-204
New Port Richey, Fl. 34654

May 17, 2007

RE: West Pasco Class III Landfill, Pasco County
Financial Assurance Cost Estimates
Pending Permit No. 26254-001-SO/T3

Dear Mr. Power:

This letter is to acknowledge receipt of the revised cost estimates, prepared by Tetra Tech Engineering, dated and received March 22, 2007. The cost estimates received March 22, 2007 are not approved. The following information is needed to fully evaluate the estimates submitted:

General Comments

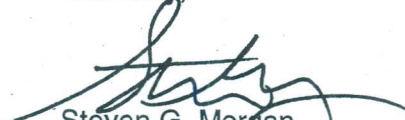
1. Please note that quantities and unit costs for closure and long-term care items may be added or changed based on comments and revisions to the above referenced permit application, therefore the proposed closure and long-term care costs may need to be revised accordingly.
2. Based on your response to the comments provided below, please provide a revised DEP Form 62-701.900(28) that incorporates all proposed changes to the closure and long-term care cost estimates and is signed by both the engineer preparing the cost estimate and the owner/operator.
3. The closing and long-term care cost estimates provided are based on a closure design (e.g. soil subgrade/40 mil synthetic liner/top soil protective layer, stormwater side slope conveyances, passive gas wells, etc.) inconsistent with the closure plan and design referenced in the above referenced permit application. Please provide revised closing and long-term care estimates, as applicable, consistent with the proposed closure and long-term care plan and design of the facility. These cost estimates will be reviewed in its entirety after receipt of this information.
4. Cost estimates provided as part of permit renewal shall be revised cost estimates and include the submittal of explanations and calculations to support quantities provided. The information, calculations, and/or assumptions utilized in support of the estimated unit quantities were not provided. This comment was previously provided in the Department's February 28, 2007 financial assurance RAI letter. Please provide this information.

5. Revised cost estimates cannot be based on inflation adjustment of previously approved costs, or be based on the costs for the County to perform the work. Therefore costs "obtained in-house or inflated from previous submittals..." cannot be utilized for estimated unit costs for closure. This comment was previously provided in the Department's February 28, 2007 financial assurance RAI letter. Please provide current third-party quotes to support all unit costs.

6. The third-party quote provided by Goodwin Brothers Construction included a cost for "Synthetic-40 mil" which does not specify what type of liner the quote is based on (e.g. HDPE, LLDPE, PVC, etc.). Please provide a third-party quote that provided this information. Please provided supporting documentation of Goodwin Brothers Construction's experience in liner installation or provide a third-party quote from a firm with adequate experience in liner installation.

The Department requests that two copies of all information be provided to the Solid Waste Section, FDEP, and Tampa office within thirty (30) days of this notice. In order to expedite the review of this information, please forward all responses related financial assurance cost estimates directly to the undersigned. If you have any questions, you may contact me at (813) 632-7600 ext. 385.

Sincerely,



Steven G. Morgan
Solid Waste Section
Southwest District

SM/sgm

cc: Robert J. Sigmond, Pasco County, 7530 Little Road, New Port Richey, Florida 34654
Aamod Sonawane, P.E., CDM Inc., 1715 N. Westshore Blvd., Suite 875, Tampa, Florida 33607
Andrew T. Woodcock, MBA, P.E., Tetra Tech, 201 East Pine St., Suite 1000, Orlando, Florida 32801
Fred Wick, FDEP Tallahassee w/attachment
Susan Pelz, P.E., FDEP Tampa

**Florida Department of
Environmental Protection**

Memorandum

TO: Steve Morgan
FROM: John Morris, P.G. JRM
DATE: April 18, 2008
SUBJECT: West Pasco Class III Landfill, Operation Permit Application
Pending Permit No. 26254-001-SO, Pasco County
Hydrogeologic and Environmental Monitoring Review Comments (Responses to RAI #2)
cc: Susan Pelz, P.E.

I have reviewed portions of the materials submitted to the Department in support of the referenced operation permit renewal application for the West Pasco Class III Landfill, prepared by CDM on behalf of Pasco County Utilities, received October 8, 2007, November 6, 2007, December 28, 2007 and March 21, 2008. These materials were submitted in response to the Department's letter dated May 18, 2007 which requested additional information regarding the pending permit renewal application, and included the following:

- Document entitled "Response to FDEP's 2nd Request for Additional Information on West Pasco Class III Landfill, Operations Permit Renewal Application, Pending Permit #26254-001-SO/T3, Pasco County, Florida," dated October 2007, received October 8, 2007 including:
 - Letter prepared by CDM, dated October 5, 2007
 - Section 2 - "Response to John Morris Memorandum Dated May 17, 2007," prepared by CDM, dated October 5, 2007 [**referred to as the "CDM response"**];
- Letter prepared by CDM dated November 5, 2007, received November 6, 2007, transmitting the locations and construction details of two deep monitor wells (Floridan aquifer), prepared by QORE Property Sciences, dated November 2, 2007
- Letter prepared by CDM dated and received December 28, 2007, describing the locations and construction details of two deep monitor wells (Floridan aquifer)
- Letter prepared by CDM dated March 20, 2008, received March 21, 2008, transmitting the following:
 - Document entitled "Water Quality Monitoring Plan for the West Pasco County Class III Landfill," prepared by CDM, dated March 2008 [**referred to as the "WQMP document"**]

Please note that it appears the proposed monitor well locations and construction details transmitted by the above-referenced CDM letters dated November 5, 2007 and December 28, 2007 have been wholly replaced by the information presented in the WQMP document. Accordingly, this memorandum does not provide review comments regarding the information transmitted by these two CDM letters but limited the review of proposed changes to the monitoring plan for the West Pasco Class III Landfill to the information provided by the WQMP document.

My review focused on the hydrogeologic investigation and monitoring plan that had been prepared for the pending permit application. Additional information is needed to evaluate the adequacy of the proposed revisions to the monitoring plan. Please have the applicant provide responses to all comments that do not contain the phrase: **"No additional information is requested."** Please have the applicant provide revised submittals, or replacement pages to the submittals, that use a strike through and underline format, or similar format, to facilitate review. Please also have the applicant include the revision date as part of the header/footer for all revised or replacement pages (text, figures, tables, appendices, site plans, etc.).

The review comment numbers presented below are consistent with my memoranda dated February 28, 2007 and May 17, 2007. To facilitate the review process, those comments that were fully addressed by previous submittals have been deleted from this memorandum. The information requests have been referenced to sections of the permit application form and sections of the supporting documents, where appropriate, as presented below:

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Part B – Disposal Facility General Information

1. **B.13.:** The CDM response indicated that the property that includes the West Pasco Class III landfill is recorded as a disposal site in the County Land Records. **No additional information is requested.**

Part I – Hydrogeological Investigation Requirements (Rule 62-701.410, F.A.C.)

2. **I.1.a., through I.1.i., and I.2.:** The CDM response indicated that the best available copies of Sheet 1 (Aerial/Topographic Site Plan), Sheet 2 (Soil Profiles), and Plate 2 (USDA Vicinity map) of the document entitled “Summary Report, Geotechnical/Hydrogeological Investigation, Proposed Class III Sanitary Landfill, Hays Road Site, Pasco County, Florida,” prepared by Jammal & Associates, Inc. [“Jammal report”], dated May 26, 1987 were provided. The CDM response also indicated that neither Pasco County nor CDM have additional copies of the Jammal report that provide legible copies of the above-referenced excerpts. Please submit a revised application form for item #I.1.f. [page 25 of 40] that references Section 2.0 of the WQMP document.

Part M – Water Quality and Leachate Monitoring Requirements (Rule 62-701.510, F.A.C.)

3. **M.1.:** The CDM response referred to the discussions between the County, CDM and the Department regarding the monitoring plan for the West Pasco Class III landfill during the meeting conducted on August 6, 2007. Based on subsequent conversations following receipt of the CDM letters dated November 5, 2007 and December 28, 2007, a replacement monitoring plan was developed for the facility (i.e., the WQMP document). As indicated in Section 1 of the WQMP document, it replaces the previously submitted monitoring plan information for the facility (document entitled “Water Quality Monitoring Plan Evaluation, 2004 – 2006, West Pasco Class III Landfill ” [WQMPE], prepared by MACTEC Engineering and Consulting, Inc., dated August 3, 2006, and the above-referenced Jammal report). Please submit a revised application form for items #M.1.a., through #M.1.h.(1) [pages 32/33 of 40] to reference the appropriate sections of the WQMP document, as follow:

- M.1.a. – WQMP document, Section 1
- M.1.b. – WQMP document, Section 4.1
- M.1.c.(1) – WQMP document, Section 3.1
- M.1.c.(2) – WQMP document, Section 3.1.1
- M.1.c.(3) – WQMP document, Section 3.2
- M.1.c.(4) – WQMP document, Table 3-1
- M.1.c.(5) – WQMP document, Section 3.1
- M.1.c.(6) – WQMP document, Section 3.1.3 and Table 3-1
- M.1.c.(7) – WQMP document, Section 3.1
- M.1.d.(1) – WQMP document, Section 3.3
- M.1.e. – WQMP document, Section 3.2
- M.1.f.(1) – WQMP document, Section 4.2
- M.1.f.(2) – WQMP document, Section 4.3
- M.1.f.(3) – WQMP document, Section 4.2
- M.1.f.(4) – WQMP document, Section 4.4
- M.1.g. – WQMP document, Sections 5.1 and 5.2
- M.1.h.(1) – WQMP document, Section 4.5

Please note that the items in Part M of the application form not listed above remain unchanged, including:

- M.1.c.(8) – N/A
- M.1.d.(2) – N/A
- M.1.h.(2) – document entitled “Water Quality Monitoring Plan Evaluation, 2004 – 2006, West Pasco Class III Landfill,” prepared by MACTEC Engineering and Consulting, Inc., dated August 3, 2006

6. **M.1.c.(1):** The discussion of detection well locations provided in Section 3.1 of the WQMP document was sufficient to meet the requirements of Rule 62-701.510(3)(a), F.A.C. **No additional information is requested.**

7. **M.1.c.(2):** The discussion of existing wells 2MW-8, 4MW-8 and 2MW-10 being designated as compliance wells provided in Section 3.1.1 of the WQMP document was sufficient to meet the requirements of Rule 62-701.510(3)(b), F.A.C. **No additional information is requested.**
8. **M.1.c.(5):** The discussion of well spacing provided in Section 3.1 of the WQMP document was sufficient to meet the requirements of Rule 62-701.510(3)(d)3, F.A.C. **No additional information is requested.**
9. **M.1.c.(6):** The discussion of well screen sections for the proposed monitor wells provided in Section 3.1.3 of the WQMP document was sufficient to address the requirements of Rule 62-701.510(3)(d)4, F.A.C. Table 3-1 of the WQMP document provided the construction details of the existing monitor wells, however it appeared to be inconsistent with Table 1 entitled “Ground Water Monitor Well Construction Details, West Pasco Class III Landfill,” provided as Appendix D of the “Response to FDEP February 28, 2007 Comments,” prepared by CDM, dated April 2007. Please review the following inconsistencies and submit revisions to Table 3-1, as appropriate:
- Wells 4MW-3A, 4MW-8 and 4MW-9 were indicated to be completed as “open hole” in Table 1, while they were indicated to be “screened” in Table 3-1

In addition, the screen section elevation presented in Table 3-1 for well 4MW-3A does not appear to include the conversion between NAVD and NGVD. Based on the ground elevation and total depth provided in Table 3-1, it appears that the screen section elevation would be 28.54 to 0.54 ft NGVD. Please review the screen section elevation provided for well 4MW-3A and submit revisions, as appropriate.

10. **M.1.c.(7):** The discussion of well abandonment procedures provided in Section 3.1 of the WQMP document was sufficient to address the requirements of Rule 62-701.510(3)(d)5, F.A.C. **No additional information is requested.**
13. **M.1.e.:** The discussion of leachate sampling provided in Section 3.2 of the WQMP document was sufficient to address the requirements of Rules 62-701.510(5) and 62-701.510(6)(c), F.A.C. **No additional information is requested.**
14. **M.1.f.(1):** The parameter lists referenced in Section 4.2 of the WQMP document were sufficient to address the requirements of Rule 62-701.510(6), F.A.C. **No additional information is requested.**
16. **M.1.g.:** The discussion of the criteria that require the initiation of evaluation monitoring, prevention measures, and corrective action provided in Sections 5.1 and 5.2 of the WQMP document was sufficient to address the requirements of Rule 62-701.510(7), F.A.C. **No additional information is requested.**
17. **M.1.h.(1):** The discussion of data reporting provided in Section 4.5 of the WQMP document was sufficient to address the requirements of Rule 62-701.510(9)(a), F.A.C. **No additional information is requested.**
18. **M.1.h.(2):** The following comments that refer to sections of the GWMPE:
- Section 1.3.1 – Water Quality Monitoring Plan
- b. The well construction details for the existing wells was provided in Table 3-1 of the WQMP document. **No additional information is requested.**
- Section 1.3.2 – Leachate Monitoring Plan
- d. Leachate sampling and analysis was discussed in Section 4.3 of the WQMP document. **No additional information is requested.**

Section 2.4.3 – Ground Water Gradient

f. Calculation of hydraulic gradient was presented in Section 6 of the WQMP document. **No additional information is requested.**

Section 2.4.4 – Ground Water Flow Velocity

g. Calculation of ground water velocity in the Floridan aquifer was presented in Section 6 of the WQMP document. **No additional information is requested.**

This staff assessment is preliminary and is designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the Department and may be subject to revision pursuant to additional information for further review.

I can be reached at (813) 632-7600, extension 336, to discuss these comments.

jrm