



# Florida Department of Environmental Protection

Southwest District Office  
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Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

Mr. Daniel Gray, Director  
Manatee County Utility Operations  
4410 66<sup>th</sup> Street West  
Bradenton, Fl. 34210

May 22, 2008

RE: Lena Road Landfill, Manatee County  
Pending Modification No.: 39884-015-S0/MM, Sequence of Filling  
to Operation Permit No. 39884-010-SO/01

Dear Mr. Gray:

This is to acknowledge receipt of the additional information dated April 16, 2008 (received April 23, 2008) submitted in support of your permit modification application, dated February 7, 2008 (received February 7 and 14, 2008), prepared by Post, Buckley, Schuh & Jernigan (PBSJ), to modify the sequence of filling the operations plan at the existing Class I landfill referred to as the Lena Road Class I Landfill, located at 3333 Lena Road, Bradenton, Manatee County, Florida.

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 modification is incomplete. This is the Department's second request for information. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received. The following information is needed in support of the solid waste application [Chapter 62-701, Florida Administrative Code (F.A.C.)]:

## **GENERAL:**

1. 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. Changes to text that has been approved prior to the pending modification should be "accepted" to more clearly identify the changes proposed as part of the pending modification. Please include revision date on all revised pages.
2. 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.
3. Please be advised that although some comments do 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. **Please be reminded that all calculations must be signed and sealed by the registered professional engineer (or geologist as appropriate) who prepared them.**

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

1. **Section 2, Plan sheets titled, *Lena Road Landfill Fill Sequence Plan, Stage III Landfill from 2004 to 2013*** (Rules 62-701.320(5)(b), 62-701.320(7)(f), F.A.C.) Please be advised that the drawings will be reviewed in their entirety after responses to this item are received.

- a. Current topographic survey. No additional information is requested for this item.
- b. Although Sheet C-11A was provided and includes an additional N-S cross-section that shows filling Sequences 5 and later, it does not appear that Section D shown on Sheet C-11A is included in plan view sheets C-8, C-9 and C-10. Please provide revised plan view sheets that show the location of Section D.
- c. Signed and sealed plans. No additional information is requested for this item.
- d. Sheet C-11. No additional information is requested for this item.
- e. Sheet C-12. No additional information is requested for this item.

2. **Section 3, Operations Plan, Rule 62-701.500, F.A.C.** Please be advised that the Operations Plan will be reviewed in its entirety after responses to this item are received.

- a. §2.b., Contingency Operations for Emergencies. Please confirm that the water that is sprayed on hot loads will be managed as leachate. Please provide revised operation plan pages as appropriate.
- b. §2.c., Control of Types of Materials Received.
  - 1) E-scrap. No additional information is requested for this item.
  - 2) Since Section 6.0, Load Checks, indicates that load checks may only be conducted a minimum of three times per week, please confirm if the load checking form will be used for documenting hazardous or other unauthorized wastes in all loads (since all loads must be spotted).
  - 3) Tires. Please revise this section to specify they types of tires that are disposed of in the landfill (e.g., large agricultural equipment tires and forklift tires).
- c. Figure L-4. No additional information is requested for this item.
- d. §8.b., Operation and Maintenance of the LCS. No additional information is requested for this item.



(Comment #2, cont'd)

e. Attachment L-2, Household Hazardous Waste Collection and Storage Facility

- 1) §3.0. No additional information is requested for this item.
  - 2) §13.2, *Waste Bulking*. Please specify the disposition of absorbents used to clean up spills.
  - 3) §13.4, *Electronic Waste*. No additional information is requested for this item.
- f. Please address the comments in Mr. John Morris' memorandum dated May 22, 2008, attached.

3. **Section 4, Landfill Gas Recovery System, Rule 62-701.530(5), F.A.C.**

a. Appendix A, Drawings.

- 1) *Drawing PID-1*. Please clarify if the glycol mixture will be characterized prior to disposal, and specify the disposal location/facility. Please provide a drawing that shows the connection of the condensate drains, LFG knockout and leachate collections system.
- 2) *Drawing M-1*. No additional information is requested for this item.

b. Appendix B. No additional information is requested for this item.

4. **Section 5, Biosolids Dryer System.**

a. No additional information is requested for this item.

b. No additional information is requested for this item.

c. Sheet C-301 (rec'd 4/23/08) provides additional details of the solids drying project and references sections to other sheets.

- 1) *Sheets C-202, C-203, C-204*. These sheets indicate that the LFG piping slopes 0.4%. Please verify that only one condensate knockout is provided in this design (shown on Sheet C-201). Please provide a detail of the condensate knockout and specify where the condensate is discharged.

5. **Notice of Application, Rule 62-701.320(8), F.A.C.** No additional information is requested for this item.

**The following comment is for information only at this time and does not require a response:**

1. Operations Plan Section 10 provides a revised description of the site's stormwater management system. Please note that the Solid Waste Section has not reviewed this information for compliance with Department stormwater rules and issuance of the pending solid waste permit modification does not constitute an approval of any changes to the existing stormwater management system, which may require a permit or permit modification from the Department's ERP Section.

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 18, 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 date noted above**, you should develop an alternate specific time table for the submission of the requested information for Department review and consideration. Pursuant to the provisions of Rule 62-4.055(1), F.A.C., 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.

You are requested to submit your responses to this letter together, as one complete package. Please contact me at (813)632-7600 ext. 386 if you have any questions.

Sincerely,



Susan J. Pelz, P.E.  
Solid Waste Manager  
Southwest District

sjp

attachment

cc: Gus DiFonzo, Manatee County, 4410 66<sup>th</sup> Street West, Bradenton, Fl. 34210,  
w/attachment (email)  
Joseph Miller, P.E., PBSJ, 482 S. Keller Road, Orlando, Fl. 32810-6101,  
w/attachment (email)  
John Morris, P.G., FDEP, SW (email)  
David Zell, FDEP, Air (email)  
Jeff Hilton, P.E., FDEP, DW (email)  
Al Gagne, FDEP ERP (email)



## Memorandum

## Florida Department of Environmental Protection

TO: Susan Pelz, P.E. *JP*  
FROM: John R. Morris, P.G. *JRM*  
DATE: May 22, 2008  
SUBJECT: Lena Road Landfill, Application for Minor Permit Modification  
Pending Modification #39884-015, Manatee County  
Environmental Monitoring Review Comments (responses to RAI #1)

I have reviewed portions of the materials submitted in support of the referenced application for minor permit modification that were prepared by PBS&J on behalf of Manatee County Solid Waste Division, received April 23, 2008. These materials were prepared in response to the Department's letter dated March 6, 2008 that requested additional information regarding the application for the referenced permit and included the following:

- Letter prepared by PBS&J dated April 16, 2008, re: "Response 1 to RFI #1 dated March 6, 2008" [referred to as the **"PBS&J response letter"**], and transmitting the following:
  - Site Plans entitled "Permit Renewal Drawings for Manatee County – Lena Road Landfill, Fill Sequence Plan, Stage III Landfill, 2004 to 2013," revised March 2008, drawings #C-1 through #C-13, #C-2A, #C-7A, and #C-11A, prepared by PBS&J, signed/sealed April 15, 2008
  - Drawing #C-301 entitled "Utility Conflict Sections and Profiles," prepared by Andritz-Ruthner, Inc., revised June 1, 2007
  - DEP Form #62-701.900(1), Section L – Landfill Operation Requirements, revised April 16, 2008
  - Document entitled "Lena Road Landfill Operations Plan," replacement page #L-51, revised April 16, 2008
  - Document entitled "Household Hazardous Waste Collection & Storage Facility Operations Plan," replacement pages #L2-20 and #L2-21, revised April 16, 2008
  - Figure L-8A entitled "Landfill Gas Migration Monitoring Locations," prepared by PBS&J, dated March 16, 2008

My review focused on the environmental monitoring aspects of the permit modification application and related submittals. The comment numbers presented below are consistent with my memorandum dated March 6, 2008.

Please have the applicant address all of the review 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 information requests have been referenced to sections of the permit application and are also referenced to the sections of the supporting document where appropriate, as presented below:

### **PART L – LANDFILL OPERATION REQUIREMENTS**

(Rule 62-701.500, F.A.C.)

1. **L.1., through L.13.d.:** The PBS&J response letter referred to Section L of DEP Form #62-701.900(1) that referenced the corresponding sections of the revised Operations Plan for items #L.1., through L.13.d. Please submit revised page L-34 of the Operations Plan that includes the heading "Section 10.0" to indicate that it is the beginning of the "Storm Water Management" section.

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

2. **L.9.:** The PBS&J response letter referred to a copy of Figure L-8A entitled “Landfill Gas Migration Monitoring Locations,” dated March 16, 2006 [previously submitted as part of the Stage I closure permit] to more legibly present the boundaries of Stages I, II and III, the gas probe locations/identification numbers, and the ambient gas monitoring locations/identification numbers. Please submit revisions to this figure and/or Section 9.0 of the revised Operations Plan to address the following inconsistencies:

- a) Section 9.0a., ¶1 of the revised Operations Plan (page L-28) refers to Figure L-8, the referenced drawing dated March 16, 2006 is identified as Figure L-8A.
- b) Section 9.0a., ¶1 of the revised Operations Plan (page L-28) refers to six interior gas points, the inset table on Figure L-8A [“Gas Point Locations Descriptions”] refers to seven gas points.

3. **L.13.b.:** The PBS&J response letter referred to revised page L-51 of the revised Operations Plan to include preparation of the monthly monitoring report for the gas extraction system and of the quarterly monitoring report for the gas probes and ambient monitoring locations. **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 contacted at 813-632-7600, extension 336, to discuss these comments.

jrm