



Pasco County, Florida

DEEPER 844 - 4704

Phone 856-0119

VINCENT MANNELLA, P.E.

Solid Waste Facility Manager

(813) 847-8041

Ext. 8884

7536 State St.

New Port Richey, FL 34654

FAX (813) 847-8064

KF 4

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 2-25-98

Subject RAW CORE COVER

Time 10:15 A.M.

Permit No. —

County PASCO

MR. VINCE MANELLA

Telephone No. —

Representing —

☒ Phoned Me [] Was Called [] Scheduled Meeting [] Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting —

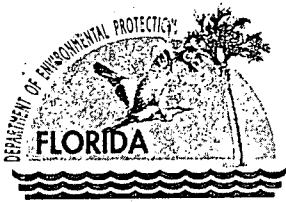
Summary of Conversation/Meeting —

IN CONVERSATION WITH VINCE RELATING TO THE PERMITS REQUEST FOR FURTHER SAMPLING REQ'S. OF LEAKATE TO EVALUATE HAULING TO ANCLOTE POWER PLANT, I ASKED THE STATUS OF RAW CORE COVER PROCUREMENT - VINCE INFORMED ME THAT P.O. HAS TO BE SIGNED BY BOCC. (THIS WEEK) AND THAT HE WILL EXPEDITE P.O. TO VENDOR. VENDOR INFORMED VINCE IT WOULD TAKE 2 WEEKS TO DELIVER & INSTALL. NOTE: VINCE SAID THIS IS EARMARKED FOR A-1. I SUGGEST THEY KEEP MATERIAL FOR USE ON A-2.

(continue on another sheet, if necessary) KIM PLEASE PUT IN WRITING TO VINCE.

Signature Robert J. Antun

Title P.E. III



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 25, 1998

Mr. Douglas Bramlett
Pasco County Utilities
7530 Little Road
New Port Richey, FL 34654

Re: West Pasco Landfill

Dear Mr. Bramlett:

In response to your February 2, 1998 letter regarding unresolved items, the following concerns are expressed in the order of your responses:

- The spreadsheet format updated and provided weekly continues to be requested since trends may be easily recognized by the County as well as the FDEP. Other counties have consistently used this spreadsheet for an effective tool in their management of leachate. The most recent spreadsheet for the month of January received by FAX on February 19th (attached) contains a discrepancy of 1.1 million gallons of leachate received by the Shady Hills WWTP in excess of that removed from disposal unit SW-1 for which an explanation is requested. The staff gauge readings as elevations and conversions to gallons have not been provided as requested. The Department has no way of knowing the freeboard available before leachate discharges over the top of the liner or the amount of leachate impounded in disposal unit A-2.
- The Department is awaiting your plans for grading and covering disposal unit A-2, for which completion is imperative prior to June 1, 1998. The 1997 leachate data summary (attached) indicates an average of less than 10,000 gallons per day, of leachate produced from unit A-1 and up to 10 times that amount from unit A-2 for months such as July 1997. The Department requests the County to cover A-2 by June 1, 1998.
- The revised operations plan remains insufficient. The Department requests a meeting with the County to discuss your responses to our February 4, 1998 letter requesting clarification.

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

Printed on recycled paper.

Mr. Doug Bramlett
Pasco County Utilities

February 25, 1998
Page Two

Please contact me immediately to setup a meeting to resolve these issues and provide a specific schedule to implement all corrective actions required to bring site into compliance.

Sincerely,



Robert J. Butera, P.E.
Solid Waste Manager
Division of Waste Management

RJB/kbfb
Attachments

cc: John Gallagher, Pasco County
Vince Mannella, P.E., Pasco County
Richard Garrity, Ph.D., DDM of FDEP Tampa
William Kutash, Adm., FDEP Tampa
Kim Ford, P.E., FDEP Tampa
Hamilton Oven, P.E., FDEP Tallahassee

P 520 310 321

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to <i>Donc Bramlett</i>	
Street & Number <i>Wasco County Ct 1</i>	
Post Office, State, & ZIP Code <i>1530 Little Rd, NPR, FL</i>	
Postage	\$ <i>34.654</i>
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>2-25-98</i>	

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

RECEIVED

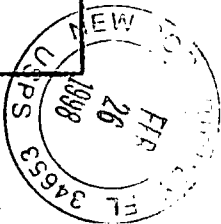
• Print your name, address, and ZIP Code in this box •

FEB 27 1998

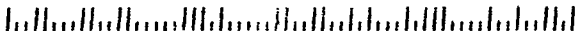
Department of

BY

State of Florida
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8318



Kim Ford - Solid Waste



SENDER: West Pasco Correll

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Doug Bromlett
Pasco County Utilities
7530 Little Rd
New Port Richey, 34654

4a. Article Number

P520 310 321

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☒ Return Receipt for Merchandise ☐ COD

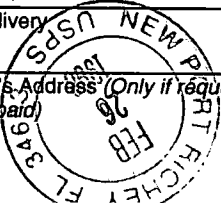
7. Date of Delivery

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X

8. Addressee's Address (Only if requested and fee is paid)



PASCO COUNTY: UTILITIES SERVICES BRANCH
LEACHATE REPORT
CALENDAR YEAR END 12/31/96

MONTH & DAY	MEASURED RAINFALL	WEST PASCO CLASS I LEACHATE REMOVED						TOTAL LEACHATE REMOVED	SHADY HILLS WWTP	OTHER OFF-SITE WWTP	ON-SITE LEACHATE MANAGEMENT PLANT	TOTAL LEACHATE DISPOSAL	BALANCE
		ASH CELL I	AA RECORDS LOWER	ASH CELL II	AA RECORDS LOWER	SOLID WASTE CELL	TPH RECORDS LOWER						
1-Jan	0.000	0	0	0	800	0	0	800	800	0	0	800	
2-Jan	0.000	45,800	0	12,000	2,200	0	0	59,800	47,800	12,000	0	59,800	
3-Jan	0.000	39,800	0	12,000	2,100	58,690	0	112,590	100,590	12,000	0	112,590	
4-Jan	0.000	7,000	0	5,000	1,500	0	0	14,500	8,500	6,000	0	14,500	
5-Jan	0.000	43,400	0	12,000	1,800	23,840	0	84,040	72,040	12,000	0	84,040	
6-Jan	0.000	0	1,421	36,000	1,900	7,040	3,234	49,595	13,595	36,000	0	49,595	
7-Jan	3.500	74,100	0	36,000	1,400	300,020	0	411,520	375,420	36,100	0	411,520	
8-Jan	2.500	19,360	0	36,000	1,900	348,800	0	405,660	368,580	36,300	0	405,660	
9-Jan	0.200	45,500	0	36,000	1,900	282,310	0	365,710	329,710	36,000	0	365,710	
10-Jan	0.000	53,600	0	12,000	1,900	150,230	0	217,730	205,730	12,000	0	217,730	
11-Jan	0.000	49,600	0	24,000	2,000	31,780	0	107,580	83,580	24,000	0	107,580	
12-Jan	0.000	43,000	0	42,000	1,800	94,380	0	181,280	139,280	42,000	0	181,280	
13-Jan	0.000	53,600	0	42,000	2,000	44,940	0	145,740	103,740	42,000	0	145,740	
14-Jan	0.000	88,500	0	43,000	1,500	22,600	0	155,600	112,600	43,000	0	155,600	
15-Jan	0.010	62,700	1,323	34,900	1,700	20,320	3,136	123,779	89,179	34,600	0	123,779	
16-Jan	3.800	73,400	0	55,700	1,500	282,340	0	412,940	357,740	55,200	0	412,940	
17-Jan	0.000	139,600	0	55,200	2,000	214,410	0	411,210	356,010	55,200	0	411,210	
18-Jan	0.000	86,300	0	55,200	1,900	82,940	0	226,340	171,140	55,200	0	226,340	
19-Jan	0.000	60,100	0	55,200	1,800	33,550	0	158,850	101,450	55,200	0	158,850	
20-Jan	0.000	0	0	55,200	1,400	28,750	0	85,350	30,150	55,200	0	85,350	
21-Jan	0.000	0	0	55,200	2,300	22,370	0	79,870	24,870	55,200	0	79,870	
22-Jan	0.000	25,100	1,274	43,200	1,700	15,450	2,009	88,733	45,533	43,200	0	88,733	
23-Jan	0.800	0	0	73,800	2,000	19,710	0	95,510	21,710	73,800	0	95,510	
24-Jan	0.000	0	0	81,700	2,000	50,020	0	113,720	58,020	55,700	0	113,720	
25-Jan	0.000	0	0	12,400	1,300	24,500	0	38,200	25,800	12,400	0	38,200	
26-Jan	0.000	0	0	18,000	1,700	29,600	0	49,300	31,300	18,000	0	49,300	
27-Jan	0.000	0	0	60,000	1,700	24,180	0	85,880	25,680	60,000	0	85,680	
28-Jan	0.000	0	0	55,800	1,500	19,220	0	78,520	20,720	55,800	0	76,520	
29-Jan	0.000	0	1,274	62,100	1,200	11,430	1,421	77,425	15,325	62,100	0	77,425	
30-Jan	0.000	0	0	62,300	1,300	7,570	0	71,170	8,870	62,300	0	71,170	
31-Jan	0.000	0	0	62,600	1,300	11,250	0	75,450	12,550	62,900	0	76,450	
JANUARY	10.810	1,022,660	5,292	1,227,500	53,100	2,282,040	9,800	4,580,392	3,358,992	1,221,400	0	4,580,392	0

** West Pasco Class I Landfill has a total of 29 acres, which are comprised of three cells. The cells consist of the following:
 - Ash Cell I - 10 acres INTERMEDIATE COVER
 - Ash Cell II - 10 acres OPEN
 - Solid Waste Cell I - 10 acres OPEN

PASCO COUNTY: UTILITIES SERVICES BRANCH
LEACHATE REPORT
CALENDAR YEAR END 12/31/97

MONTH & DAY	MEASURED RAINFALL	ASH CELL I		ASH CELL II		SOLID WASTE CELL		TOTAL LEACHATE REMOVED	SHADY HILLS WWTP	OTHER OFF-SITE WWTP	ON-SITE LEACHATE MANAGEMENT PLANT	TOTAL LEACHATE DISPOSAL	BALANCE
		SECOND LAYER	A-1 SECOND LAYER	SECOND LAYER	A-2 SECOND LAYER	SECOND LAYER	SW-1 SECOND LAYER						
Jan-97	2.100	159,979	1,911	1,200	0	142,381	5,929	311,380	311,380	0	0	311,380	0
Feb-97	1.600	136,907	2,548	82,100	1,200	158,697	1,176	382,628	382,628	0	0	382,628	0
Mar-97	2.650	86,735	1,225	60,168	0	205,209	2,401	355,738	355,738	0	0	355,738	0
Apr-97	7.300	170	1,715	1,662,100	100	282,330	3,724	1,950,139	975,149	0	974,990	1,950,139	0
May-97	0.800	374,493	1,127	292,800	15,000	433,890	3,430	1,120,740	998,420	0	122,320	1,120,740	0
Jun-97	6.500	82,350	2,744	321,000	24,800	787,078	6,762	1,224,734	1,025,164	0	199,570	1,224,734	0
Jul-97	11.850	137,945	1,323	1,371,800	46,700	2,493,884	3,871	4,055,523	3,758,505	0	297,018	4,055,523	0
Aug-97	7.950	204,289	833	330,300	0	1,786,445	3,675	2,325,542	1,790,120	0	305,655	2,095,775	229,767
Sep-97	8.300	40	1,813	0	55,777	957,830	4,067	1,019,527	961,897	96,000	401,580	1,459,477	(210,183)
Oct-97	6.700	10	2,646	0	121,700	734,530	10,143	869,029	744,673	72,600	432,290	1,249,563	(590,717)
Nov-97	5.800	0	1,568	66,100	68,000	800,900	3,773	940,341	804,673	18,000	0	822,673	(473,049)
Dec-97	18.900	900,400	2,744	234,000	50,400	2,775,370	6,517	3,969,431	2,781,887	228,000	0	3,009,887	486,495
1997	80.450	2,083,318	22,197	4,421,568	383,677	11,558,524	55,468	18,524,752	14,890,234	414,600	2,733,423	18,038,257	486,495

** West Pasco Class I Landfill has a total of 30 acres, which are comprised of three cells. The cells consist of the following:

- Ash Cell I - 10 acres INTERMEDIATE COVER
- Ash Cell II - 10 acres OPEN
- Solid Waste Cell I - 10 acres OPEN

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 2/25/96

Subject W Pasco Leachate

Time 12:50

Permit No. _____

County Pasco

M Larry Mason

Telephone No. 941 / 648-4571

Representing AT+E

☒ Phoned Me ☐ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting _____

140 Ran metals - total + dissolved last time -
Charles Kovach has the results.

Need to know which corrosivity test to run
SW846 Method 1110 - Corrosivity toward steel

Savannah Labs is running samples in
Deerfield Beach - TAT
corrosivity - Wed
ammonia - by Monday

→ Vince told Larry that the system failed because
the solids handling systems were grossly undersized
Evaporator did not fail because
(continue on another sheet, if necessary) of corrosivity.

Signature Al Amman

Title PGI

PA-01

1/96

pap

New drying system + baghouse (2 1/2 times bigger)
on order - should be in mid April.

SL SAVANNAH LABORATORIES & ENVIRONMENTAL SERVICES, INC.

6712 Benjamin Road • Suite 100 • Tampa, FL 33634 • (813) 885-7427 • Fax (813) 885-7049

LOG NO: 83-30488
Received: 20 FEB 98
Reported: 20 FEB 98

Mr. Larry Maron
Atlanta Testing & Engineering, Florida Division
1211 Tech Boulevard, Suite 200
Tampa, FL 33619

Project: Pasco County Leachate
Sampled By: Client

REPORT OF RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION , LIQUID SAMPLES	DATE/ TIME SAMPLED			
30488-1	A-2 Sump (unfiltered)	02-17-98/1135			
30488-2	A-2 Sump (filtered)	02-17-98/1135			
30488-3	A-2 Surface (unfiltered)	02-17-98/1140			
30488-4	A-2 Surface (filtered)	02-17-98/1140			
PARAMETER		30488-1	30488-2	30488-3	30488-4
Aluminum, mg/l		<0.20	<0.20	0.99	<0.20
Barium, mg/l	<i>Arsenic?</i>	2.0	2.1	0.79	0.76
Cadmium, mg/l		<0.0050	<0.0050	0.026	0.022
Copper, mg/l	<i>Chromium?</i>	0.11	<0.025	0.095	0.072
Iron, mg/l		11	11	0.24	<0.050
Lead, mg/l		0.031	<0.0050	0.042	<0.0050
Magnesium, mg/l		3.0	3.1	3.1	3.0
Manganese, mg/l		0.58	0.58	0.20	0.18
Nickel, mg/l		<0.040	<0.040	<0.040	<0.040
Silver, mg/l	<i>Selenium?</i>	<0.010	<0.010	<0.010	<0.010
Zinc, mg/l		0.28	0.066	0.34	0.13

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 2/25/98

Subject Pasco Leachate

Time 10:20

Permit No. _____

County _____

M Andre Rachmaninoff

Telephone No. 885-7472

Representing Savannah Labs

[] Phoned Me ☒ Was Called [] Scheduled Meeting [] Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting _____

Does FDEP's contract include:

Leachate analysis's for

not on
FDEP's
contract { ammonia/unionized ammonia - 24-48 hrs
corrosivity — 1 week
filtered/unfiltered metals — didn't talk w/ Pasco
about them

What's quickest TAT? 72 hrs. - 100% mark up
Price?

Pasco Co has contacted them to do these tests!
Larry Mason - ~~Pasco Co.~~ AT+E for Pasco Co.

(continue on another
sheet, if necessary)

Signature AAmmann

Title PG/

phone record - Allison Amram + Bob Butera called;
2/25/98 - 9:15 am

Doug Bramlett, Pasco Co. Utilities

Left message for him to call Bob or Allison this morning.

Spoke w/ Vince Manella - Solid Waste Facility Mgr (9:20) 813/856-0119

Pursuing 200,000 gpd haul to FPC
Will take sludge from FPC + process

Continuing ~~to~~ w/ 60,000 gpd to Curren WWTP
(Tampa). Freeing up a Pasco tanker when
WWTP ok's increase in volume.

Rain cell cover - bid "winner" going to the
Board next week. He doesn't know delivery
schedule.

Asked Vince to include filtered/unfiltered metals,
ammonia/un-ionized ammonia, corrosivity
in today's sampling - he will. I asked him
what kind of lab turn-around time ^(RTD) he can get -
DEP getting data together to issue some kind of
Order to allow leachate disposal @ FPC -- need
this data first. Explained that FPC discharges

to Gulf where it is designated as an Outstanding Florida Water (OFW). As an OFW, there is no mixing zone & no acceptable degradation. DEP needs to know that the metals are in dissolved phase & will be diluted enough not to cause degradation. If metals are particulate, there will be a concern of accumulation in sediment.

Corrosivity - will let ~~the~~^{FPC} know if leachate can be run thru the cooling system

Unionized ammonia - toxic form to aquatic life

Vince will call Allison when he knows the lab's TAT.

West Pasco Leachate Disposal mtg

2/25/98

p 1/4

FPC - RIB - @ Anclote

Need dilution - can maybe take 100,000 gpd
PB a concern, corrosivity

Can pump into canal to mix w/ plants discharge

Charles - Best plan - run leachate thru their cooling
system - drive off ammonia, ↓ BOD. FPC
may be able to - question is corrosivity. Provides
best mixing + dilution

Anticipate emer. order w/in the week

FPC will accept order if it absolves them from any
env. impact.

Emer. order - temp. waives compliance - Sec'y signs
Admin " - doesn't " " - Rick signs

Bill - proposing Admin Order - no reason to expect
water qual violations w/ such massive dilution

FPC - should monitor for metals before taking leachate
We're not sure they'll agree to this.

Discharging to OFW - no new Q to Gulf there
Cannot have degradation

Pasco Co
Lab do
today?

- Need total/dissolved metals - can't have particulate
metals - could degrade sed. in OFW
Can use data to set limits - leach. qual expected to
degrade toward bottom

SW - Needs to set level, elev, key to end A/O.

A/O - FPC - you can take leachate - ^{max} ^{gpd or} ^{% of cooling} ^{total flow}

Pasco - once you reach end pt - do [↑] _{flow}

Pasco - Require hauling — gpd min. install raincover

If A/O doesn't work - can go to judge right away to get enforcement

- where can Pasco load trucks?

[Savannah - DEP - Tampa - Contract lab
 Elizabeth Foster - Beauchamp
 Andre Rachmaninoff
 Field PO - \$500 ceiling
 Price - 2 day TAT]

- Kent - what's best TAT? ^{Have to go to} ^{contract lab to get} ^{several weeks.}

incorp. in weekly samp - ~~get~~ ^{2 day} ^{TAT}

Doug
Bramlett

[Get ~~tilt~~ ⁱⁿ metals
 ammonia / ~~in~~ ion. ^{corrosivity} ^{conductivity}]

@@@

4/1/98 Application due to renew or modify
Complete

Op. after 4/1 - 5yrs LTC + \$

4/2/98 No appl - send W/L

NA 4 - W. Pagco Leachate

	A1	A2	SW1	SW2
7/18/97	22.5	<0.03	22	4.27
2/19/97	14.7	<0.07	13.2	16.8
8/21/96	29.3	.14	20.5	8.16
1/11/96	7.50	0.09	13.9	.10
10/17/95	6.29	<0.15	17.5	<0.15
7/25/95	8.36	<0.07	20.8	0.22
4/15/95	8.47/0.115	<0.07/<0.02	LE?/LE	<0.07/<0.02
1/10 ³¹ /95	7.63/0.001	<0.07/<0.02	1.76/0.248	<0.07/<0.02
9/13/94	7.18/0.08	<0.07/<0.02		
7/19/94	13.5/0.359	0.126/<0.02	NOT IN USE	
4/15/94	5.60/0.05	<0.07/<0.02		
1/7/94	20.2/5.34	0.18/<0.02		
10/11/93	42.1/3.96	0.10/<0.02		
7/15/93	28.31/0.764	0.10/<0.02		

- unionised ammonia

Data from
EPC

Table 1
Leachate Quality
Cell A-2 Sump

Primary
leachate from
active ash/salt cell

Parameter	9/8/97	9/15/97	9/22/97	9/30/97	10/7/97	10/21/97	12/24/97	12/31/97	1/7/98	1/14/98	1/21/98	1/28/98
Alkalinity as CaCO ₃	231	162	305	389	338	172						
Total Organic Carbon	41.2	59	56.7	35.9	38.5	14.4						
Chloride	22,419	17,216	29,110	23,120	28,072	18,737	20,558	49,991	45,435	35,259	33,485	36,557
Fluoride	0.12	0.13	0.14	0.24	0.14	0.13						
Ammonia N	22.4	13.2	28.9	27.2	23.7	13.3						
Kjeldahl N	22.6	13.4	28.6	26.0	24.6	13.6	10.2	48.4	15.1	40.8	41.2	34.4
Nitrite	0.03	0.02	0.06	<0.01	<0.01	<0.01						
Nitrate	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11						
pH, Lab	7.33	7.07	7.05		7.47	7.14	7.52	8.70	6.74	7.38	7.44	7.40
Total Phosphorus	0.30	0.11	0.17	0.09	0.18	0.21						
Total Dissolved Solids	82,500	69,400	98,500	58,900	64,100	45,400			129,000	111,600	156,200	87,600
Total Suspended Solids	22	23	3	32	302	23	34	17	506	486	592	408
Specific Conductivity	56,700	44,100	67,400	60,700	57,200	47,900			111,200	90,100	77,000	81,700
Sulfate	454	472	546	449	429	378			560	603	632	573
Aluminum	0.200	0.138	0.269	0.201	0.218	0.114						
Arsenic	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.04	<0.04	<0.04	<0.04
Barium	3.05	2.73	3.16	3.05	2.16	2.04						
Cadmium	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	0.15	0.12	0.17	0.13	0.13	0.13
Calcium	9,900	6,390	8,790	8,180	7,460	5,950						
Chromium	<0.01	0.012	<0.01	<0.01	0.016	<0.01	<0.01	<0.01	<0.01	<0.01	0.01	<0.01
Copper	0.15	0.12	0.16	0.16	0.17	0.15	0.28	0.26	0.30	0.30	0.34	0.25
Iron	0.77	0.48	0.59	1.52	0.88	0.6						
Lead	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	2.30	1.82	1.58	1.69
Magnesium	4.33	5.06	3.44	3.87	4.10	4.87						
Manganese	0.52	0.56	0.38	0.58	0.57	0.52						
Nickel	0.61	0.40	0.59	0.52	0.57	0.46	1.19	1.03	1.19	0.92	1.04	1.11
Potassium	3,170	2,470	3,680	3,370	3,300	2,390						
Selenium	<0.01	<0.07	<0.01	<0.01	0.012	<0.01	<0.01	<0.01	<0.04	<0.04	<0.04	<0.04
Silver	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	0.31	0.25	0.34	0.25	0.25	0.26
Sodium	4,360	3,990	5,640	5,210	5,120	3,900						
Zinc	0.08	0.07	0.09	0.07	0.12	0.06	0.15	0.13	0.26	0.17	0.32	0.15
BOD							436	294	288	143	169	251

All concentrations in milligrams per liter (mg/l), except pH (in units) and specific conductivity (in micromhos per centimeter).



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (813) 856-0119
FAX (813) 856-0007

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PASCO COUNTY SOLID WASTE
RESOURCE RECOVERY FACILITY
14230 HAYS ROAD
SPRING HILL, FL 34610

February 18, 1998

Mr. Kim Ford, P.E. I
Division of Waste Management
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

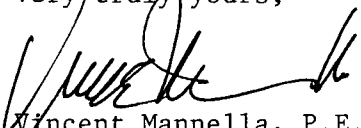
RE: Chloride Disposal from Pasco County
Leachate Management Plant (LMP)

Dear Mr. Ford:

Please be advised that Pasco County has entered into a contract to haul the LMP product to Chamber Waste Systems of Florida, Inc., Class I Landfill, Okeechobee, FL. This hauling agreement will continue until terminated by either party.

I will keep the Department advised.

Very truly yours,


Vincent Mannella, P.E.
Solid Waste Facility Manager

VM/drc

cc: Robert J. Butera, P.E. III, Division of Waste Management, Florida Department
of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator
Ronald J. Walker, Solid Waste Superintendent



PASCO COUNTY, FLORIDA

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Department of Environmental Protection
SOUTHWEST DISTRICT

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(813) 847-8064

UTILITIES SERVICES BRANCH
PUB. WKS./UTILITIES BLDG., S-213
3300 LITTLE ROAD
NEW PORT RICHEY, FL 34654

February 17, 1998

Mr. Kim Ford, P.E. I
Division of Waste Management
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: Your Fax to Mr. Ron Walker of February 12, 1998

Dear Mr. Ford:

Thank you for your Fax and recommendation to cut 10'0" off Disposal Unit A-1 and push the ash into Disposal Unit A-2. Please be assured that your recommendation was considered and rejected.

Sincerely,

A handwritten signature in black ink, appearing to read "D. S. Bramlett".

Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv/18\ford

cc: Robert Butera, P.E. III, Division of Waste Management, FDEP, Tampa, FL
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager
Ronald J. Walker, Solid Waste Superintendent

PASCO COUNTY: UTILITIES SERVICES BRANCH
LEACHATE REPORT
CALENDAR YEAR END 12/31/96

MONTH & DAY	MEASURED RAINFALL	WEST PASCO CLASS I LEACHATE REMOVED						TOTAL LEACHATE REMOVED	SHADY HILLS WWTP	OTHER OFF-SITE WWTP	ON-SITE LEACHATE MANAGEMENT PLANT	TOTAL LEACHATE DISPOSAL	BALANCE
		ASH CELL I	AA SECOND LAYER	ASH CELL II	AB SECOND LAYER	SOLID WASTE CELL	FW-1 SECOND LAYER						
1-Jan	0.000	0	0	0	800	0	0	800	800	0	0	800	
2-Jan	0.000	45,800	0	12,000	2,200	0	0	59,800	47,800	12,000	0	59,800	
3-Jan	0.000	39,800	0	12,000	2,100	58,690	0	112,590	100,590	12,000	0	112,590	
4-Jan	0.000	7,000	0	8,000	1,500	0	0	14,500	8,500	6,000	0	14,500	
5-Jan	0.000	48,400	0	12,000	1,800	23,840	0	84,040	72,040	12,000	0	84,040	
6-Jan	0.000	0	1,421	36,000	1,900	7,040	3,234	49,595	13,595	36,000	0	49,595	
7-Jan	3.500	74,100	0	36,000	1,400	300,020	0	411,520	375,420	36,100	0	411,520	
8-Jan	2.500	19,380	0	36,000	1,900	348,800	0	405,860	368,580	36,300	0	405,860	
9-Jan	0.200	45,500	0	36,000	1,900	282,310	0	365,710	329,710	36,000	0	365,710	
10-Jan	0.000	53,600	0	12,000	1,900	150,230	0	217,730	205,730	12,000	0	217,730	
11-Jan	0.000	49,800	0	24,000	2,000	31,760	0	107,560	83,580	24,000	0	107,560	
12-Jan	0.000	43,000	0	42,000	1,900	94,380	0	181,280	139,280	42,000	0	181,280	
13-Jan	0.000	58,600	0	42,000	2,000	44,840	0	145,740	103,740	42,000	0	145,740	
14-Jan	0.000	38,500	0	43,000	1,500	22,600	0	155,600	112,600	43,000	0	155,600	
15-Jan	0.010	62,700	1,323	34,900	1,700	20,320	3,136	123,779	89,179	34,600	0	123,779	
16-Jan	3.800	73,400	0	55,700	1,500	282,340	0	412,940	357,740	55,200	0	412,940	
17-Jan	0.000	139,600	0	55,200	2,000	214,410	0	411,210	356,010	55,200	0	411,210	
18-Jan	0.000	86,300	0	55,200	1,900	82,840	0	226,340	171,140	55,200	0	226,340	
19-Jan	0.000	69,100	0	55,200	1,800	33,560	0	158,650	101,450	55,200	0	158,650	
20-Jan	0.000	0	0	55,200	1,400	28,750	0	85,350	30,150	55,200	0	85,350	
21-Jan	0.000	0	0	55,200	2,300	22,370	0	79,870	24,870	55,200	0	79,870	
22-Jan	0.000	25,100	1,274	43,200	1,700	15,450	2,008	86,733	45,533	43,200	0	86,733	
23-Jan	0.800	0	0	73,800	2,000	18,710	0	85,510	21,710	73,800	0	85,510	
24-Jan	0.000	0	0	81,700	2,000	50,020	0	113,720	58,020	55,700	0	113,720	
25-Jan	0.000	0	0	12,400	1,300	24,500	0	38,200	25,800	12,400	0	38,200	
26-Jan	0.000	0	0	18,000	1,700	29,600	0	49,300	31,300	18,000	0	49,300	
27-Jan	0.000	0	0	60,000	1,700	24,180	0	85,880	25,680	60,000	0	85,680	
28-Jan	0.000	0	0	55,800	1,500	19,220	0	78,520	20,720	55,800	0	76,520	
29-Jan	0.000	0	1,274	62,100	1,200	11,430	1,421	77,425	15,325	62,100	0	77,425	
30-Jan	0.000	0	0	62,300	1,300	7,570	0	71,170	8,870	62,300	0	71,170	
31-Jan	0.000	0	0	62,600	1,300	11,250	0	75,450	12,550	62,900	0	76,450	
JANUARY	10.610	1,022,680	5,292	1,227,500	53,100	2,282,040	9,800	4,560,392	3,358,982	1,221,400	0	4,580,382	0

** West Pasco Class I Landfill has a total of 29 acres, which are comprised of three cells. The cells consist of the following:

- Ash Cell I - 10 acres INTERMEDIATE COVER
- Ash Cell II - 10 acres OPEN
- Solid Waste Cell I - 10 acres OPEN



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
LAND O'LAKES (813) 996-7341
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FAX (813) 847-8064

UTILITIES SERVICES BRANCH
PUB.WKS./UTILITIES BLDG., S-205
7530 LITTLE ROAD
NEW PORT RICHEY, FL 34654

February 18, 1998

Mr. Kim B. Ford, P.E.
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Subject: **West Pasco Landfill Operations Plan**
LAW Project 40141-7-0291.03.912

Dear Mr. Ford:

This letter is to respond to your comments concerning the Operations Plan for West Pasco Landfill as contained in your letter dated February 4, 1998. Your comments are repeated below in **bold** type followed by our response.

Comment 1:

Section 1.1. Please provide copies of any documents of Department authorization to place the chloride bags in the west end of A-2. The Department is unaware of any authorization to place chloride bags or ash in the west end of A-2. What specifically has been done to seek a contract for off-site disposal of chloride bags?

Response:

Refer to Attachment 1 for copies of documents authorizing the County to place chloride bags at the west end of A-1. In regard to seeking a contract for off-site disposal of bags, the County has a contract to haul and dispose of the chloride bags off site.

Comment 2:

Section 1.2. 1) What is the basis for the County's decision to allow leachate to accumulate in A-1? The Department has advised the County continue to pump leachate from A-1 (primary

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and secondary systems) to A-2. 2) Why is the existing cover on A-1 not promoting run-off as it was intended to? 3) Why has the County stopped hauling leachate to the New Port Richey WWTP?

Response:

- 1) There was no other storage area for the leachate. As you know the on-site leachate management facility is not operating and the storage tank is at capacity.
- 2) The ash beneath the soil cover is very permeable. The County has not observed runoff in the collection ditches around the perimeter. The slopes of the cover/ash are 4 horizontal to 1 vertical and so rainfall has an opportunity to soak into the soil. If a steeper slope was used, mowing would be more difficult. The Department may have seen success with this rule-mandated cover but it is not promoting runoff at this site. Some ponding occurred on top of and near the east end of the site, but it is our opinion that only a small percentage of runoff accumulated here and is not a significant source of leachate in A-1.
- 3) Leachate was disrupting the operation of their plant.

Comment 3:

Section 3.1. 1) Please provide a specific grading plan for items 1 and 2 in this section including cross-sections with slopes and elevations to promote storm-water runoff. 2) Please describe an improved method of placing the chloride bags to prevent damage.

Response:

- 1.) A minimum slope of one percent will be maintained on the surface to promote runoff. The goal is to bring elevation of ash to the top of the berm (Elevation 63).
- 2.) If it is necessary to dispose of the bags again in the disposal unit, the area beneath the bags will be inspected prior to placing the bags to identify and remove any sharps that could damage the bags. The elevation of the ash beneath the bags will be above the top of the disposal unit berm to avoid soaking from the leachate level below the bags.

Comment 4:

Section 3.1, 8.2.6. References to detailed cross-sections for filling are requested.

Response:

Refer to the drawings and the response to Comment 3.

Comment 5:

Section 3.1, 8.2.7. Wood chips as cover are not approved and should be deleted.

Response:

Acknowledged, see Revised Operations Plan provided under separate cover.

Comment 6:

Section 3.1, 8.2.8. This section should be changed for revised gas vent details that may be required and reference to the Shady Hills WWTP.

Response:

See Revised Operations Plan.

Comment 7:

Section 3.1, 8.7.5. Wood chips as cover are not approved and should be deleted.

Response:

See Revised Operations Plan.

Comment 8:

Section 3.1, 8.7.6. Reference to removal and reuse of soil cover is unclear. Is soil proposed as initial cover?

Response:

See Revised Operations Plan.

Comment 9:

Section 3.1, 8.8.2. Please provide a copy of Appendix A5.4.

Response:

This document was provided. It doesn't include the leachate action rate calculations because LAW doesn't have a copy.

Comment 10:

Section 3.1, 8.8.3. This section should be changed for reference to Shady Hills WWTP.

Response:

See Revised Operations Plan.

Comment 11:

Section 3.1, 8.8.4. Please provide copies of agreements for a two (2)-year period for transporting ash leachate and each off-site WWTP to be used for disposal. These agreements should include the maximum amounts to be transported and for disposal by each WWTP, and identify all limitations such as the hours per day or days per week. The Department continues to expect the maximum amount of ash leachate to be removed for off-site disposal at the New Port Richey WWTP (12,000 gpd) and Tampa WWTP (60,000 gpd) until leachate compliance levels are maintained. What effort is the County making to increase off-site disposal at these facilities and to others?

Response:

Refer to the Revised Operations Plan.

Comment 12:

Section 3.1, 8.8.5. The reference to the Hudson WWTP is unclear.

Response:

See Revised Operations Plan.

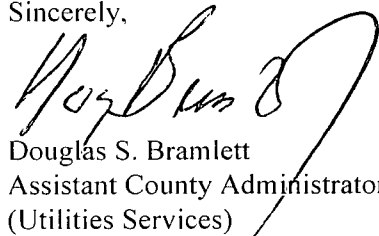
Comment 13:

Section 3.1, 8.8.6. Recirculation of ash leachate into disposal unit A-2 is not approved as an ongoing contingency plan but only as required to prevent a catastrophic event such as the discharge of ash leachate from A-1.

Response:

Acknowledged. As of February 11, 1998, all secondary leachate extracted from A-2 is being transported to the Tampa WWTP. The leachate from the secondary in A-1 is being pumped to the on-site leachate management facility.

Sincerely,



Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/cjs/ENVIRO/COMMON/4014170291.03.C&R

Attachment

cc: Robert Butera, P.E. III, Division of Waste Management, FDEP, Tampa, FL
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager
Ronald J. Walker, Solid Waste Superintendent

ATTACHMENT 1

**PASCO COUNTY, FLORIDA
INTEROFFICE MEMORANDUM**

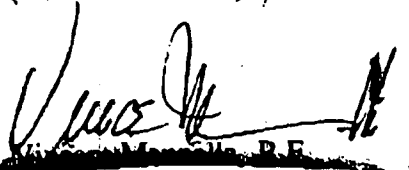
TO: John J. Gallagher
County Administrator

DATE: 12/2/97

FILE: UT98-297

THRU: Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

SUBJECT: Response to your Inquiry: Florida
Department of Environmental Protection
(FDEP) Letter of November 21, 1997

FROM: 
Solid Waste Facility Manager

REFERENCE:

The FDEP letter of November 21, 1997 contains three specific questions responded to as follows:

1. FDEP was aware of placement of salt sacks on the west end of Cell A-2. There is no desirable way to get the super sacks to the west end over the sand - an ash base road had to be made.
2. In our original submission it was clear that there was an expectation of sack breakage. The broken sacks are nominal and we have changed to stronger sacks and have eliminated breakage.
3. The secondary leachate was not pumped daily due to very low primary leakage - daily pumping is approximately 1,600 gallons which is below the EPA leakage rating for landfills.

This entire problem has been magnified by the non-functioning Leachate Management Plant. It has been inoperable since October 22, 1997 and is still not operating, and will not be this year. Hopefully by mid January of 1998 the plan may be operational.

VM/mvv

cc: Ronald Walker, Solid Waste Superintendent

DRAFT**PASCO COUNTY, FLORIDA
INTEROFFICE MEMORANDUM****TO:** John J. Gallagher
County Administrator**DATE:** 12/01/97**FILE:** UT98-**THRU:** Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)**SUBJECT:** RESPONSE TO YOUR INQUIRY;
DEP LETTER OF NOVEMBER 21, 1997**FROM:** Vincent Mannella, P.E.
Solid Waste Facility Manager**REFERENCE:**

The DEP letter of November 21, 1997 contains three specific questions responded to as follows:

1. DEP was aware of placement of salt sacks on the West end of A-2. There is no desirable way to get the super sacks to the West end over the sand an ash base road had to be made.
2. In our original submission it was clear that there was an expectation of sack breakage. The broken sacks are nominal and we have changed to stronger sacks and have eliminated breakage.
3. The Secondary Leachate was not pumped daily due to very low primary leakage - daily pumping is approximately 1600 gallons which is below the EPA leakage rating for landfills.

This whole problem has been magnified by the non-functioning Leachate Management Plant. It has been inoperable since October 22, 1997, is still not operating, and will not be this year. Hopefully by mid January, 1998 the Leacate Plant may be operational.

VM/drc

cc: Ronald J. Walker, Solid Waste Superintendent



PASCO COUNTY, FLORIDA

DADE CITY (904) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (813) 847-8145
FAX (813) 847-8064

UTILITIES SERVICES BRANCH
PUB. WKS./UTILITIES BLDG., S-213
7530 LITTLE ROAD
NEW PORT RICHEY, FL 34654

September 29, 1997

Mr. Kim Ford, P.E.
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: Chloride Disposition from Leachate Management Plant (LMP)

Dear Mr. Ford:

This letter is in response to our telephone conversation of September 26, 1997 regarding the filling and placement of super sacks of chlorides. The chloride bags are being placed in the A-2 Disposal Unit along the west side of the disposal unit. The super sacks of chlorides will be placed on a layer of earth (dirt), with the bags progressing in a northerly direction. The super sacks will have dirt (earth) placed between them and a cover layer of earth will be placed on the top of the super sacks of chlorides prior to the placement of the second row. We will then proceed to place a second row of super sacks on top of the first.

This procedure has been previously approved by the Department. This communication is to recertify that we are both in agreement of placement of super sack of chlorides.

The very unusual storm event on the week-end of September 27, 1997 brings to mind the possibility of a major storm and the heavy load of potential incoming storm debris. To this event I am planning to store tire chips in disposal unit SW-1 to assure that I will have on hand sufficient cover for the stored material in SW-1. The stored tire chips will provide cover from either storm and or municipal solid waste by-pass due to the Resource Recovery Plant boiler outages.

I trust that the Department will understand my desire to prepare for possible heavy loads of incoming municipal solid waste.

Mr. Kim Ford, P.E.
September 29, 1997

Please advise me at your earliest possible convenience. If, however, I do not receive word from the Department to the contrary by October 5, 1997, I will assume the Department entertains no objections to my suggestion.

for chips
Sincerely,

(M. Mannella for)

Vincent Mannella, P.E.
Solid Waste Facility Manager

VM/mvv

cc: Robert Butera, P.E., Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator (Utilities Services)
Ronald Walker, Solid Waste Superintendent



PASCO COUNTY, FLORIDA

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UTILITIES SERVICES BRANCH
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NEW PORT RICHEY, FL 34654

January 29, 1997

Mr. Kim Ford, P.E.
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: Chloride Disposal in SW-1

Dear Mr. Ford:

Thank you for your response to my inquiry of January 13, 1997.

Item No. 1: Disposal Unit SW-1 is designated for the disposal of solid waste, not the ash or its residuals which remain after leachate treatment such as the chlorides.

Reply: Agree

Item No. 2: Chlorides from the ash/leachate discharged into the SW-1 appears to have caused problems with the treatment at the Shady Hills WWTP. Leakage from any of the chloride residual bags in SW-1 may alter its leachate characteristics and treatability.

Reply: The leachate discharged from SW-1 was not the primary cause of problems at the Shady Hills WWTP. There are 420,945 tons of ash in A-1 compared to approximately 11,000 tons of ash in SW-1. The chloride contained in ash never increases, but does decrease with each rain when no more ash is added. Ash was continuously added in A-1 and is now added daily in cell A2. Therefore, ash in SW-1 was not the cause of treatment problems at the Shady Hills WWTP.

Pasco County has, however, after giving the problem considerable thought, now determined to place super sacks of chlorides in cell A-2.

*is
not
AUTHORIZATION*

Mr. Kim Ford, P.E.
January 29, 1997
Page 2 of 2

The amended operations plan requested by the department has been completed and has been mailed. You should be receiving the amended plan in the immediate near future.

Sincerely,



Vincent Manbetta, P.E.
Solid Waste Facility Manager

VM/mvv

cc: Mr. Robert Butera, Florida Department of Environmental Protection, 3804 Coconut Palm Drive
Tampa, FL 33619-8318
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator (Utilities Services)
Ronald Walker, Solid Waste Superintendent

CDMenvironmental
services

Camp Dresser & McKee Inc.

One Tampa City Center, Suite 1750
Tampa, Florida 33602
Tel: 813 221-2833 Fax: 813 221-2279

D.E.P.

JAN 11 1996

SOUTHWEST
TAMPA

January 11, 1996

HAND DELIVERY

Mr. Kim Ford

Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

RE: Pasco County Leachate Storage Tank and Treatment Facility

Dear Mr. Ford:

The following information supplements the information forwarded to you on December 13, 1995 and is pursuant to our meeting with you on January 9, 1996.

Solids Handling

Below is the solids handling information supplied in our December 13 correspondence.

"The solids handling bags will be placed in the landfill at the rate of about one per day. They will be initially placed on an area prepared for their placement. The area may be an unused portion of the cell or it may be on the ash residue where large metal objects have been removed. The bags will be placed side by side until it is reasonable to begin another lift. Ash residue which has been subjected to ferrous extraction or clean fill will be used to fill voids between bags and to provide a cover cushion over the top of the layer of bags. A minimum amount of bag breakage in the form of punctures or small tears is expected and will not alter the quality of leachate to a degree that the treatment process will not function properly."

Two specially designed and constructed trailers will be used to transport the bags from the treatment facility to the landfill cell. The trailer will be towed using available equipment at the landfill. The specifications for the trailer are attached. The loading operation will occur under the baghouse where the empty bag will be placed in the trailer, the bag spout (fill leg) will be connected to the outflow sleeve on the baghouse hopper. The baghouse hopper has a rotary valve that can be manually closed to prevent discharge of the salts during bag changeover.

The facility operators, as part of their operations training during facility start-up, will be instructed on proper procedures to employ when operating the solids handling equipment. The operators will also be instructed on placement of the filled bags in the landfill. (Those procedures are outlined above). Due to the innovative nature of this facility and process, some experience with the solids handling system will need to be gained in order to fully develop standard operating procedures which are efficient and minimize bag breaches.

CDM Camp Dresser & McKee Inc.

Mr. Kim Ford
January 11, 1996
Page 2

Spray Dryer and Baghouse

Preliminary plan and elevations of the spray dryer and baghouse are attached. These have been developed by the process system supplier and can be easily located on our facility layout drawings.

Process Flow

A process flow diagram is included. A review of this information together with our facility layout will reveal the flow of materials into and out of the facility.

Miscellaneous

A revised set of plans is transmitted herewith which addresses all of your comments on the facility details.

Proof of Publication

A copy of the proof of publication is attached.

We trust this information adequately explains and addresses the issues raised in our meeting on January 11, 1996.

Sincerely,

CAMP DRESSER & McKEE INC.



Darwish El-Hajji, P.E.

cc: Doug Bramlett/Pasco County
Vince Mannella/Pasco County
D. Strobbridge/CDM
J. Banks/CDM

Bob HB

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 2/16/98

Subject W PASCO

Time 8:25

Permit No. _____

M Dick Mayen

County _____

Telephone No. _____

Representing _____

☒ Phoned Me ☐ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting _____

Dm asked for other options for Leachate Disposal
I said we gave him quite a few already:

2 ports, Laister, Ipc Jacksonville, Ft power - Anclote,
St Pete got possible problems already w/ deep wells.

I asked for progress report on the ones we have
already listed before we go looking for more options.

I asked for response to DEP's Feb 5, 1998 letter
to D Branker this week. Dm said he is
working on it.

(continue on another
sheet, if necessary)

Signature [Signature]

Title _____



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (813) 847-8145
FAX (813) 847-8064

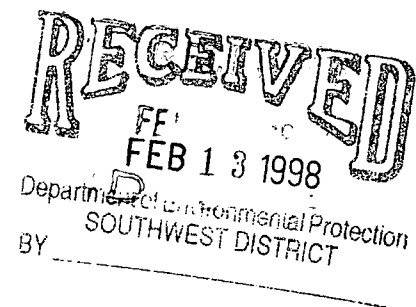
UTILITIES SERVICES BRANCH
PUB. WKS./UTILITIES BLDG., S-213
7530 LITTLE ROAD
NEW PORT RICHEY, FL 34654

February 10, 1998

Mr. Robert J. Butera, P.E. III
Division of Waste Management
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: Your Letter Dated February 5, 1998

Dear Mr. Butera:



Thank you for your above-referenced letter and your concern for our mutual leachate problem. The suggestions contained in your letter are appreciated and will be given full consideration by Pasco County as well as other options we are looking into.

In response to your three suggestions, be advised of the following:

Item No. 1: Pasco County is pursuing off-site disposal seven days per week and is exceeding your suggested volume of 60,000 gpd by 12,000 gpd.

Item No. 2: As discussed via telephone on February 9, 1998, Pasco County will proceed to pursue alternative disposal sites, as we are doing actively, by reviewing various options. We will implement alternative options as soon as practical and within limits imposed by County Government requirements.

Item No. 3: Pasco County is aware of the problems of disposal Unit A-2 and has submitted to the Florida Department of Environmental Protection (FDEP), via a revised operating plan, the matters suggested in this item. The partial coverage of disposal Unit A-2 is solely dependent on:

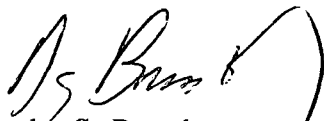
- a. The amount of boiler ash delivered to the site; and
- b. the volume of leachate disposed of.

Mr. Robert J. Butera, P.E. III
February 10, 1998

Corrective measures are underway and will be pursued diligently until this problem is abated. However, an artificial date of any time is dependent on Item A and B above and the rainfall received.

Please rest assured that Pasco County has no desire to have any leachate discharged outside the lined landfill and will do all that is possible to prevent it.

Sincerely,



Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv/18/butera

cc: Kim B. Ford, Division of Waste Management, FDEP, Tampa, FL
Richard D. Garrity, Ph.D., Director of District Management, FDEP, Tampa, FL
William Kutash, Environmental Administrator, FDEP, Tampa, FL
Chris McGuire, Senior Att., Waste/Air Section, FDEP, Tallahassee, FL
Steve Morgan, Environmental Specialist III, FDEP, Tampa, FL
Richard Tedder, Professional Engineer III, FDEP, Tallahassee, FL
Mary Jean Yon, Environmental Administrator, FDEP, Tallahassee, FL
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager

FDEP

3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

FAXED

Date: 2/12/98

Number of pages including cover sheet: 5

To:

Ron Walker

pasco County

Phone:

813 856 0119

Fax phone:

813 856 0007

CC:

From:

Kim Ford

Phone:

(813) 744-6100

x382

Fax phone:

(813) 744-6125

REMARKS:

☐

Urgent

☒

For your review

☐

Reply ASAP

☐

Please comment

THE CENTER AND PLAN. WE DISCUSSED
YESTERDAY

HERE'S MY PLAN FOR A-2 /
SHOW ME YOURS.

THE DEPARTMENT STILL DOES NOT
HAVE THE LIST OF CORRECTIVE
ACTIONS AND SCHEDULE FOR
COMPLIANCE REQUESTED MONTHS AGO.

PLEASE SHARE THIS WITH JUNE THY



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
and via FAX


February 5, 1997

Mr. Douglas Bramlett
Assistant County Administrator
Utilities Bldg. S-213
7530 Little Road
New Port Richey, FL 34654

Re: West Pasco Landfill Corrective Actions, Pasco County...

Dear Mr. Bramlett:

As the Department continues to observe Pasco County's efforts to correct the leachate management problems at the landfill, the conditions worsen. The amount of rainfall in December has contributed to a seemingly impossible situation. The leachate levels in disposal units A-1 and A-2 are threatening to overtop the landfill berms. Therefore, the Department strongly suggests implementation of all of the following:

- 
1. Pasco County should continue off-site disposal (60,000 gpd at Tampa WWTP) and on-site treatment (the maximum volume possible when available, and a minimum 20,000 gpd) 7 days per week, and 24 hours per day if required.
 2. Within 7 days of receipt of this letter, Pasco County should also begin removal of at least 100,000 gallons per day to another off-site disposal facility such as one with underground injection or a mixing zone subject to Department approval. This increased removal should continue until the facility returns to compliance.
 3. Pasco County should fill in disposal unit A-2, regrade it and cover it (or most of it) with a geomembrane to prevent stormwater infiltration by collecting it on top of the liner and pumping it off or sloping the top to drain it off.

With removal and disposal of 180,000 gpd (60,000 Tampa WWTP, 20,000 on-site LTP and 100,000 to other disposal facilities), 18,000,000 gallons would be removed within 100 days allowing ash to be regraded and covered to prevent future excessive leachate generation. As an effort to avoid the discharge of ash leachate outside the lined landfill, the Department expects these corrective actions to be completed by June 1, 1998.

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

Printed on recycled paper.

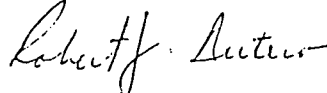
Mr. Douglas Bramlett
Pasco County

February 5, 1998
Page Two

The intent of this letter is to address only the corrective actions necessary for the reduction of leachate to assure that no discharge occurs.

If you have any questions you may call me at (813) 744-6100, extension 451.

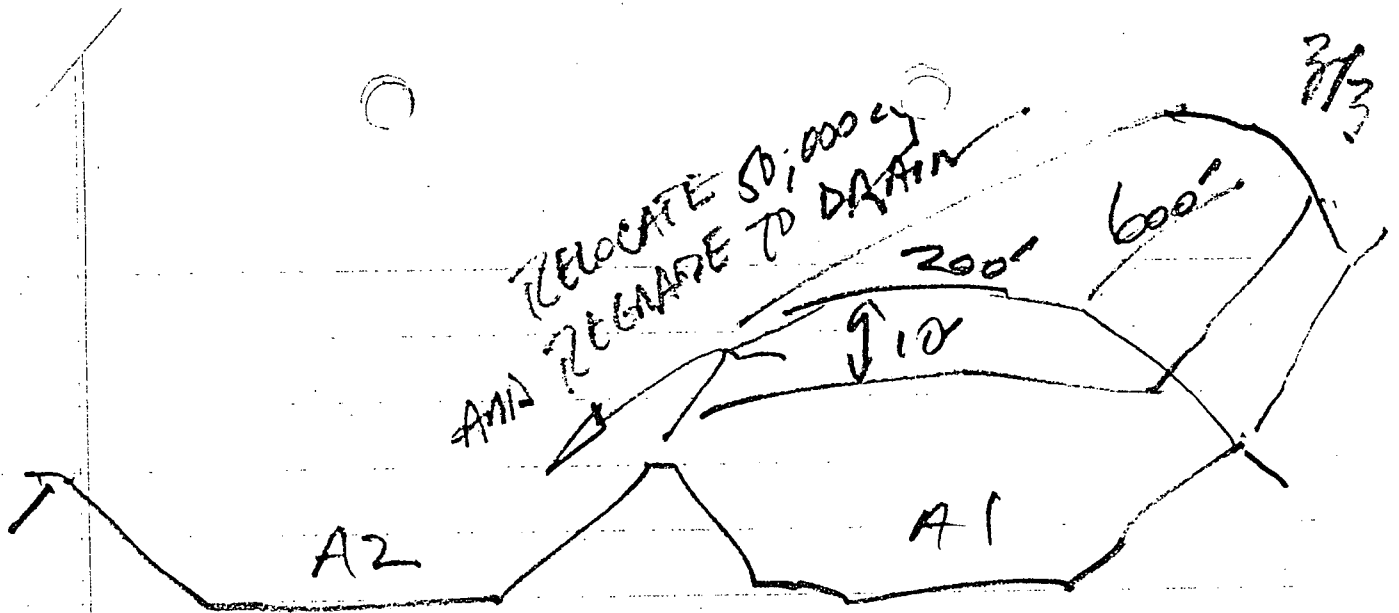
Sincerely,



Robert J. Butera, P.E.
Solid Waste Manager
Division of Waste Management

KBF/ab

cc: John Gallagher, Pasco County
Vince Mannella, P.E., Pasco County
Richard Garrity, Ph.D., FDEP Tampa
William Kutash, FDEP Tampa
Richard Tedder, FDEP Tallahassee
Mary Jean Yon, FDEP Tallahassee
Chris McGuire, OGC, FDEP Tallahassee
Kim Ford, P.E., FDEP Tampa
Steve Morgan, FDEP Tampa



$$10' \times 200' \times 600' \div 27 = 44,444 \text{ cy}$$

USE 50,000 cy
 @ \$1.50 / cy
 TO RELOCATE
 AND REGRADE
 = \$75,000

Mr. Richard D. Garrity, Ph.D.

February 2, 1998

1
0 Item No. 3: The plans and specifications for covering Cell A-1 are out for bid, with bids to be received on February 5, 1998. The bid award and construction will be implemented with all dispatch. The covering of Cell A-2 is under discussion with Law Engineering and Environmental Services and Pasco County. The covering of Unit A-2 will be placed on high priority for completion as soon as possible. The covering is, of course, subject to:

A) uncovered areas required for roadways for ash placement in the cells, and

B) the area under leachate cannot be covered until such time as the leachate in Cell A-2 permits exposure of the cells surface.

1
2 Pasco County has a serious concern with the cells over topping (A-1 and A-2) and we are monitoring the freeboard on both cells. Be advised that the freeboard on Cell A-1 is 3'7", the freeboard on Cell A-2 is 2'25". The covering of Cell A-1 will be placed on an emergency basis which will eliminate 50% of all future leachate generated; the covering of Cell A-2 will be resolved as soon as practical application can be implemented, as noted above in Conditions A and B.

Item No. 4: Yard trash is presently being mulched and spread on haul roads. This procedure will continue until all stocked mulch is spread or hauled to Pasco County parks.

Item No. 5: Matters covered in this item are correct as noted, however, Tampa personnel, the Waste Industrial Water Manager, advised Pasco County that the FDEP Domestic Waste Section directed them (Tampa Wastewater Treatment Plant) to limit the leachate they could accept to 12,000 gallons per day to determine the Tampa WWTP's discharge limits would not be exceeded; then gradually permitting an increase in the volume accepted assuring the discharge limits would not be exceeded, then the volume could increase. This plan is working well, Pasco County presently transports 60,000 gallons per day, seven days per week. Pasco County was noticed on Thursday, January 29, 1998, that New Port Richey could no longer accept ash leachate for co-treatment. We are working with the City to start deliveries of limited loads (1-2 per day) as soon as possible. Future plans have been covered in the Revised Operations Plans, submitted by Law Engineering to the FDEP for review. Future "leachate generated rates in response to anticipated rainfall" are under study and will be forwarded to the FDEP when completed.

The following comments are in response to the "Solid Waste Management Facility Checklist" which was attached in your letter.

Number 11: Operations revised, plan has been submitted.

Transmit Confirmation Report

No. : 001
Receiver : 8-1-813-856-0007
Transmitter : WASTE MGT TAMPA SWDIST
Date : Feb 12 98 9:14
Time : 03'01
Mode : Norm
Pages : 05
Result : OK

West Pasco

Cls 1

AA, KBF

2/11/98



West Pasco AA, KBF



West Pasco AA, KBF





West Pasco

AA, KBF

West Pasco

AA, KBF

West Pasco

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West Pasco

AA, KBF



West Pasco

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West Pasco

AA KBF

West Pasco

AA, KBF



West Pasco
AA, KBI

West Pasco
AA, KBF

West Pasco
AA, KBF

West Pasco
AA, KBF



2 11 98

West Pasco

AA, KBF

West Pasco

AA, KBF



2 11 '98

	ORIGIN	Leachate - A 2		Leachate - A 2		Leachate-SW1+CL III
		City of TPA		New Port Richey		Shady Hills
Date		WWTP		WWTP		WWTP
		gallons		gallons		gallons
1-Feb-98		62800		0		39140
2-Feb-98		62000		0		245870
3-Feb-98		74000		0		355410
4-Feb-98		62900		12000		110870
5-Feb-98		62300		12000		35430
6-Feb-98						
7-Feb-98						
8-Feb-98						
9-Feb-98						
10-Feb-98						
11-Feb-98						
12-Feb-98						
13-Feb-98						
14-Feb-98						
15-Feb-98						
16-Feb-98						
17-Feb-98						
18-Feb-98						
19-Feb-98						
20-Feb-98						
21-Feb-98						
22-Feb-98						
23-Feb-98						
24-Feb-98						
25-Feb-98						
26-Feb-98						
27-Feb-98						
28-Feb-98						

LEACHATE REMOVAL - PASCO COUNTY				January 14, 1998 through January 28, 1998		
	ORIGIN	Leachate - A 2		Leachate - A 2		Leachate-SW1+CL III
		City of TPA		New Port Richey		Shady Hills
Date		WWTP		WWTP		WWTP
		gallons		gallons		gallons
14-Jan-98		25000		18000		4620
15-Jan-98		16600		18000		511510
16-Jan-98		37200		18000		511510
17-Jan-98		37200		18000		278460
18-Jan-98	Sunday	37200		18000		186030
19-Jan-98		37200		18000		61800
20-Jan-98		37200		12000		50650
21-Jan-98		37200 (Note 2)		18000		37100
22-Jan-98		12400 (Note 1)		0		24870
23-Jan-98		55800		18000		41429
24-Jan-98		37700		18000		71670
25-Jan-98	Sunday	0		0		0
26-Jan-98		0		18000		45200
27-Jan-98		60000		0		31550
28-Jan-98		55800		0		24760
29-Jan-98		62100		0		20920
30-Jan-98		62300		0		20950
31-Jan-98		62900		0		24450
	Totals	673,800		192,000		1,947,479
	by WWTP					
	Totals					
	per Cell		A-2	865,800	SW - 1	1,947,479
					CLASS III	
	Leachate removed/day	57,720			129,832	
Note (1) 24800 additional gallons hauled from SW1???						
Note (2) Crom Tank Level Increased from 29' to 31'						
The County must aggressively start hauling leachate. If only 60,000 gallons were hauled daily to both WWTP's from A-2, an additional 222,500 gallons could have been hauled.						

FDEP

3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX ~~FAXED~~

Date:

2/6/98

Number of pages including cover sheet:

11

To:

Dick Mayers

Lawyer

Phone:

2890756

Fax phone:

2895474

CC:

From:

Ann Ebers

Phone:

(813) 744-6100

x382

Fax phone:

(813) 744-6125

REMARKS:

☐ Urgent

☒ For your review

☐ Reply ASAP

☐ Please comment

Dick

Thanks for calling. Here's some
notes on my review copy that
may help you understand the
comments in my response letter

Ann

1.0 BACKGROUND

This addendum to the operations plan for Disposal Units A-1 (A-1) and A-2 (A-2) is needed to respond to changed conditions that have occurred since the original plans were developed as part of the permitting process. This addendum incorporates agreements with FDEP made by letters and presents new plans for operation of these two disposal units. Briefly, the changed conditions that precipitated writing this addendum are:

1.1 DISPOSAL UNIT A-2

Wind storms repeatedly caused erosion of the drainage layer sand from off the liner on the side slopes of the cell. The County decided to place ash along all the slopes to protect the drainage layer. In addition, the County began disposing of bags filled with chlorides generated from the on-site leachate treatment plant in the west end of A-2. In order to place the bags at the west end it was necessary to construct a road using the ash material to the bag disposal area. The County received authorization from the FDEP to dispose of the bags at the west end of A-2, and the County disposed of bags in this area in 1997. Recently, they have removed the bags from the west end and are temporarily storing the salt in roll-off containers until the material can be hauled off site to a permitted disposal area. Further disposal of chlorides in A-2 may be a contingency only because the County is seeking a contract for off-site disposal.

The leachate treatment system, designed to treat leachate generated in A-2 and A-1, has not been functional and the site has received significant rainfall over the past few months. As a result the leachate has ponded in A-1 because there is no place to dispose of leachate at a rate commensurate with the inflow. The County plans to utilize a rain tarp in combination with a proposed filling sequence to minimize leachate in this disposal unit.

1.2 DISPOSAL UNIT A-1

During operations monitoring of the leachate outfall system it was discovered that the existing valves between the leachate collection system and the manholes would not close completely because they have deteriorated. The leakage rate is on the order of 110,000 gallons per day and because the leachate treatment system has not been operational the County has had no place to

dispose of this rate of flow. Installing the plug was the only way to stop flows to the manhole and the pump station further downstream. Obviously, the next step was to replace the valves but it could not be done safely without possible spillage of leachate when the valves are removed. It was decided to place the new valves downstream of the manholes and to take these deteriorated valves out of service in an open position, replacing them as soon as possible. In order to do that it was necessary to raise the manholes to a height sufficient to allow leachate to rise in the manhole to a level equal to the level of leachate in the disposal unit when the new valve was closed. These activities have been completed and the as-built data is enclosed. Once the leachate level in A-1 is lowered to meet the one-foot rule, the deteriorated valves will be replaced and the manholes will be restored to the original (permit design) condition.

The County had observed that there was little or no runoff from the surface of A-1 even during intense storm events. Using new valve arrangement at the outfall for the leachate collection system the County decided to estimate the leachate level in the disposal unit. The elevation of the leachate was determined by opening an old valve, closing the new valve and allowing the leachate to rise in the raised manhole up to the level in the disposal unit. The elevation of leachate in the unit is 61.25 or approximately two feet below the top of perimeter berm. The existing cover is not promoting runoff and the disposal unit is filling with rainwater. An alternative cover system is needed and a geomembrane cover is planned.

The County is currently hauling the leachate contained in A-1 and A-2 to treatment plants in the area for treatment and disposal. This is a temporary measure until the on-site plant becomes operational and the elevation of leachate in each disposal unit is reduced to below the one foot rule.

2.0 DESIGN MODIFICATIONS

2.1 DISPOSAL UNIT A-2

1. The route of the access road to the west end of the disposal unit will be moved north. This road will then be located approximately parallel to the south berm at a distance of 120 feet north of the berm. The area between the berm and the road will be raised to approximately one foot above the top of the berm and graded to promote storm-water runoff to the south. This area may be covered with 6 to 8 inches of earth cover or the sharps removed from the ash and a rain tarp placed over the area. Tires will be used to secure the geomembrane.

ok when?

2. Once the area between the road and the berm is filled and covered the area to the north of the road will be filled starting from the east end of the cell in approximately 100 feet wide strips. The area around the sump will remain open. The elevation of the ash in this area will be raised to one foot above the berm and graded to promote runoff from the material. As each strip is completed a rain tarp will be placed on top. Once the entire disposal unit is filled to above the top of the berms the County will cut the geomembrane into 40-foot wide strips and may choose to remove the cover material (if used) and begin the filling sequence in accordance with this revised operations plan. *The cover material, if removed, will be stockpiled within the cell for reuse.*

?

3. The south side of the disposal unit will be used to receive the chloride bags as a contingency if other plans for the chlorides disposal do not occur. The site designated for bag disposal will be in the area between the south berm and the road as described in paragraph 1 above (see Figure 8.2A, Area A-1). The elevation of the bag disposal area will be raised to at least one foot above the berm. A rain tarp (16 mil geosynthetic fabric coated with low density polyethylene) will be laid on top of the bags to limit moisture from percolating rain from entering the bags.

ok when?
7
0

2.2 DISPOSAL UNIT A-1

The entire surface area of this disposal unit will be covered with a 20 mil geomembrane. Tires on a 50-foot grid tied together with ropes will be used to secure the geomembrane.

3.0 PLAN

3.1 INTRODUCTION

The Operations Plan for Disposal Unit A-2 was developed as part of the permit application for construction and operation of the disposal unit. The Plan is dated January 4, 1995. This addendum is to modify only the sections of the Plan that are changed and these are shown in italics:

Section	✓ 8.1	Operating Personnel Training	No change
Section	✓ 8.2	Landfill Operation Plan	
	✓ 8.2.1	Designated Responsible Operating and Maintenance Personnel	No change
	✓ 8.2.2	Contingency Operations for Emergencies	No change
	✓ 8.2.3	Controlling Types of Waste Received at Landfill	No change
	✓ 8.2.4	Weighing Incoming Waste	No change
	✓ 8.2.5	Vehicle Traffic Control and Unloading	No change
	8.2.6	Method and Sequencing of Filling Waste	Change
		<p>The West Pasco Class I Landfill will be developed using 16 disposal units as shown on Figure 8.1. Each disposal unit is approximately 10 acres. Figure 8.2 depicts the sequencing progression of lifts within a typical disposal unit. <i>However, a temporary rain tarp (20 mil geomembrane) will be secured in place by a 50-foot grid of tires tied together with rope, to minimize the formation of leachate to the extent possible. As this sheet indicates, the liner and leachate collection system will be constructed one disposal unit at a time with temporary roads and swales for access and surface-water management.</i></p> <p>Disposal Units SW-1 through SW-8 are currently designated for disposal of solid waste. The ash and solid waste will not be co-disposed. The ash residue will be monofilled, no mixing of the two materials will be allowed. <i>The term "mixing" doesn't include laying an eight-inch ash layer above drainage sand to facilitate placement and removal of solid wastes.</i></p> <p>The method of filling wastes in an individual disposal unit is described as follows: The edge of liner at the top of berm will be flagged or marked with traffic cones except at berms common between the new operating disposal unit and the adjacent filled disposal unit. Ash/solid waste will not be</p>	✓

placed within ten feet of this flagged or marked line. All incoming ash/solid waste will be directed to the work face. Berms will be maintained around the entire working disposal area to intercept and contain leachates and divert storm water to the surface-water management system (see Figure 8.3). Ash/solid waste will be placed against the side slopes of the previous day's refuse. The first row will act as a guide for the placement of refuse for the remaining rows. In each row, disposal units will be constructed having a minimum length working face to control the operation and leachate quantities, yet of sufficient length to provide adequate dumping areas and room for the landfill equipment to operate (Figure 8.3). A slope of 3 to 1 on a 50-foot wide working face will provide for centralization of operations, while providing maneuvering area for large private and commercial vehicles unloaded each day.

A-2 The filling sequence described above for ~~Lift A~~ REFUSE SLOPE (see Figure 8.2) has not been followed. Once Cell A-2 is filled to the level depicted for Lift A, in the original operations plan Lift B will also be filled to the level depicted in the original operations plan. The modified filling sequence for Lifts A and B will be as follows:

- An operational road will be constructed with ash as shown in Figure 8.2 (attached). Elevation of the road will be approximately 59 feet.
- Lift A will be filled in 100-foot wide strips from east to west *from* to an elevation of approximately 63 feet, graded to slope dipping slightly towards the outer berm, and progressively covered with a rain tarp (secured in place by tires tied together with ropes) (see Figure 8.2A).
- Lift B will be filled to an elevation of approximately 73 feet, as shown in Figure 8.2A, then graded to slope dipping slightly towards the outer berm, and progressively covered with a rain tarp (see Figure 8.2A).
- Storm-water runoff from the rain tarp will be directed into the storm-water system as planned.

The sequence of filling future lined disposal unit areas with installed leachate collection systems is developed to meeting the following objectives.

- Complete subsequent lifts over lower lifts frequent enough to minimize infiltration and conserve the field capacity of the lower lift disposal unit.

in solid waste

TOP TO DRAIN

@ 71-70%

63 to 71

on the south to north

KEEP ASH INSIDE UNDER FLAP

How to prevent erosion?

		<ul style="list-style-type: none"> Direct the surface runoff from unused portions of disposal units away from ash/solid waste using control valves, and berms, <i>and furps.</i> Design landfill slopes during operation to maximize surface runoff away from the working face and minimize leachate generation. Provide bench terraces <i>SHOW A SECTION</i> along side slopes to minimize erosion. <p>Efficient use of these techniques will reduce the need for intermediate cover and decrease leachate volumes.</p> <p>Final cover will be applied over disposal unit lifts within 180 days after the final lift over an area is completed. Final cover will consist of 18 inches of clayey material covered with 6 inches of native soils. The top six inches will be uncompacted and vegetated with native grasses or other vegetation to promote evapotranspiration (see Figure 8.4).</p>	
8.2.7	Waste Compaction and Application of Cover	Change	
	<p>In the solid waste disposal unit, sufficient cover material will be stockpiled near the working face to provide an adequate supply for at least one week of operation. No daily cover is required in the ash monofill disposal units. In areas near a borrow area, stockpiling may not be necessary. The ash/solid waste is to be placed at the bottom of the working face, within the bermed working area, and spread up toward the top in two-foot layers. The solid waste will be compacted with a minimum of three to five passes of a compactor. The ash will be compacted as necessary by a front end loader or bulldozer. The spreading of refuse is a continuous operation.</p> <p>Application of initial, intermediate, and final cover is to be performed as required per Chapter <i>62</i> 17-701, FAC. Six inches of initial cover will be applied to the working face of the solid waste disposal unit. The ash monofill disposal unit will not require initial cover. Intermediate cover consisting of 1 foot of wood or tire chips from an on-site source borrow pit will be applied within 7 days of disposal unit completion if final cover or an additional lift is not to be applied within 180 days of disposal unit completion. All intermediate cover areas will be seeded or covered with wood chips, straw or other appropriate cover material <i>seeded</i> to avoid slope erosion and sloped at two percent to allow storm water to drain off and be removed from the disposal unit <i>or as an alternate will be covered by a 20 mil</i></p>		

		geomembrane secured in place by a 50-foot grid of tires.	
		The initial intermediate and final slope on top of landfill areas will be a minimum of two percent and will not exceed four percent. The perimeter sides of all completed disposal units will have a slope of 4:1 to minimize erosion. Final cover will be applied to the landfill once the final grades are reached. Areas with final cover will be seeded or planted with grass or suitable cover vegetation.	
	8.2.8	Operations of gas, leachate, and storm-water controls	No change
	8.2.9	Water quality monitoring	No change
Section	8.3	Operating Record	No change
Section	8.4	Waste Record	No change
Section	8.5	Access Control	No change
Section	8.6	Monitoring of Waste	No change
Section	8.7	Procedures for Spreading and Compacting Waste	No change
	8.7.1	Waste Layer Thickness and Compaction Frequencies	No change
	8.7.2	Special Considerations for First Layer of Waste Placed in a Disposal Unit	No change
	8.7.3	Construction of Lifts	No change
	8.7.4	Working Face Width	No change
	8.7.5	Initial Cover	Change
		Initial cover will be applied to solid waste disposal units in order to minimize any adverse environmental, safety, or health effects such as those resulting from birds, blowing litter, odors, disease vectors, or fires. Initial cover will not be necessary for the ash monofill disposal units. <i>However, a temporary rain tarp will be used as discussed in Section 8.2.6.</i>	
		Initial cover at the solid waste disposal units (<i>solid waste</i>) will be applied at the end of each working day. The initial cover will be comprised of soil material <i>tire or wood chips</i> and be six inches in compacted thickness.	
	8.7.6	Intermediate Cover	Change
		Intermediate cover, in addition to six-inch initial cover, will be applied and maintained within seven days of disposal unit completion if additional solid waste will not be deposited within 180 days of disposal unit completion. The intermediate cover, when disposal to the initial fill phase and disposal activity is shifted to a new adjacent disposal unit for more than 180 days, will be graded to provide a surface slope and will	

January 30, 1998
Addendum

		also either be seeded or sodded with grass or covered with a 20 mil geomembrane secured by a 50-foot grid of tires to further promote runoff and minimize infiltration. When disposal activity is resumed in the disposal unit, the intermediate cover will be pushed aside (or removed) and stockpiled for use as initial cover for the resumed disposal activity.	
✓	8.7.7	Final Cover	No change
✓	8.7.8	Litter Policing Methods	No change
✓	8.7.9	Erosion Control Procedures	No change
Section	8.8	Describe Operation Procedures for Leachate Management Including:	
✓	8.8.1	Leachate Level Monitoring, Sampling, Analyses and Data Results Submitted to the Department	No change
	8.8.2	Operation and Maintenance of Leachate Collection and Removal System, and Treatment as Required	No change
	8.8.3	Procedures for Managing Leachate if it Becomes Regulated as a Hazardous Waste	No change
	8.8.4	Agreements for Off-Site Discharge and Treatment of Leachate	Change
		<p>No agreement of off site discharge and treatment is necessary. Treatment and discharge is provided by the Shady Hills WWTP. Back up treatment and discharge will be provided by the Hudson WWTP. The West Pasco Class I Landfill and the Shady Hills and the Hudson WWTPs are owned by Pasco County and operated by the Utilities Services Branch.</p> <p>1. <u>New Port Richey Wastewater Treatment Plant Co-Treatment</u> Pasco County has an agreement New Port Richey WWTP for hauling and disposal of ash leachate. The tanker loads are off-loaded and mixed with raw wastewater in the Pasco County Southwest Collection System to provide a blending of leachate and raw wastewater prior to treatment. This procedure will continue on a weekly basis until the New Port Richey WWTP has problems with effluent quality as a result of this co-treatment process or it is no longer needed.</p> <p>2. <u>City of Tampa Advanced WWTP Co-Treatment</u> Pasco County has a agreement to transport ash leachate to the Tampa WWTP. The number of loads was limited initially to assure the ash leachate does not cause adverse treatment or biological problems. After the initial delivery period, the County has hauled 60,000 gpd to the Tampa facility.</p>	

Consist of

contaminated soil not used for initial cover

Pasco County has a contract to haul up to 9000 gpd at ask at leachate. This will continue until 11/1.

PROVIDE OF HAVING AND OFF-SITE WWTP CONTRACTS FOR 2 yrs

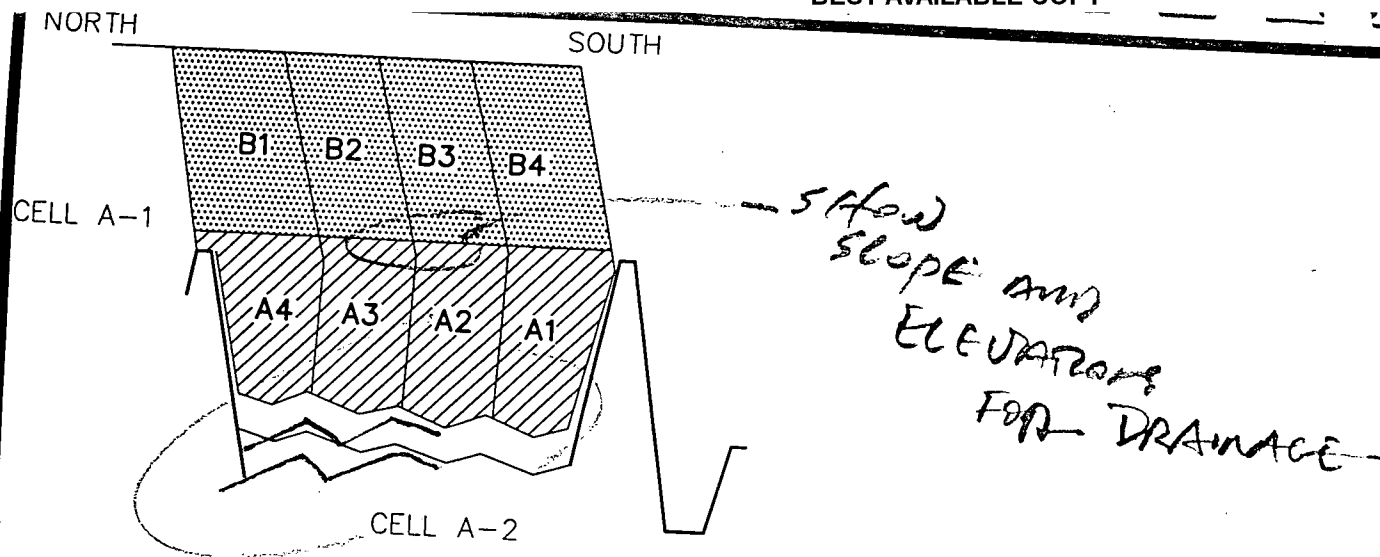
of up to 60,000 gpd. This will continue until 11/1

		<p>3. <u>Leachate Management Facility</u> <i>on-site</i> The Leachate Management Facility (LMF), if a 75 percent capacity is assumed, can process approximately 785,000 gallons per month. This facility will be used at its maximum capacity until and after the excess ash leachate is processed as necessary to process all ash leachate.</p> <p>4. <u>Shady Hills WWTP Co-Treatment</u> <i>on-site to reduce or eliminate off-site disposal and</i> The County is permitted to pump leachate generated from solid waste generated in SW-1 to the Shady Hills facility.</p>	
	8.8.5	Contingency Plan for Managing Leachate during Emergencies or Equipment Problems	Change
		<p>If equipment problems occur, such as pump failure, so that leachate cannot be removed from the leachate holding tanks or leachate pumps, the landfill supervisor will be notified so that arrangements can be made for equipment repair or replacement. If problems occur with the leachate transmission pipeline or with the WWTP, the landfill supervisor will be notified so that arrangements can be made to correct the problem and, if necessary, arrangements be made to transport leachate by tanker truck to the Shady Hills WWTP (solid waste leachate only) or the Hudson WWTP, or the City of Tampa Advanced WWTP Co-Treatment.</p>	
	8.8.6	Procedures for Recording Quantities of Leachate Generated in Gal/Day	Change
		<p>The landfill supervisor will direct staff to daily record the leachate levels measured in the <i>crum</i> tank at the leachate treatment facility and sumps and flow meters readings. Flow meter results will be subtracted from the previous day's results to determine the quantity of leachate generated, in gallons per day. Quantities will be measured and recorded daily for each primary and secondary liner system.</p> <p>During the period that Leachate Management Facility is not operational and leachate is pumped from the secondary liner system into the primary liner system, this action will be described and reworded on the daily record.</p>	
	8.8.7	Procedures for Comparing Precipitation Experienced at the Landfill with Leachate Generation Rates	No change
Section	8.9	Describe Routine Gas Monitoring Program for the Landfill as Required	No change




maintain no greater than one foot of head in each lined ash disposal unit.

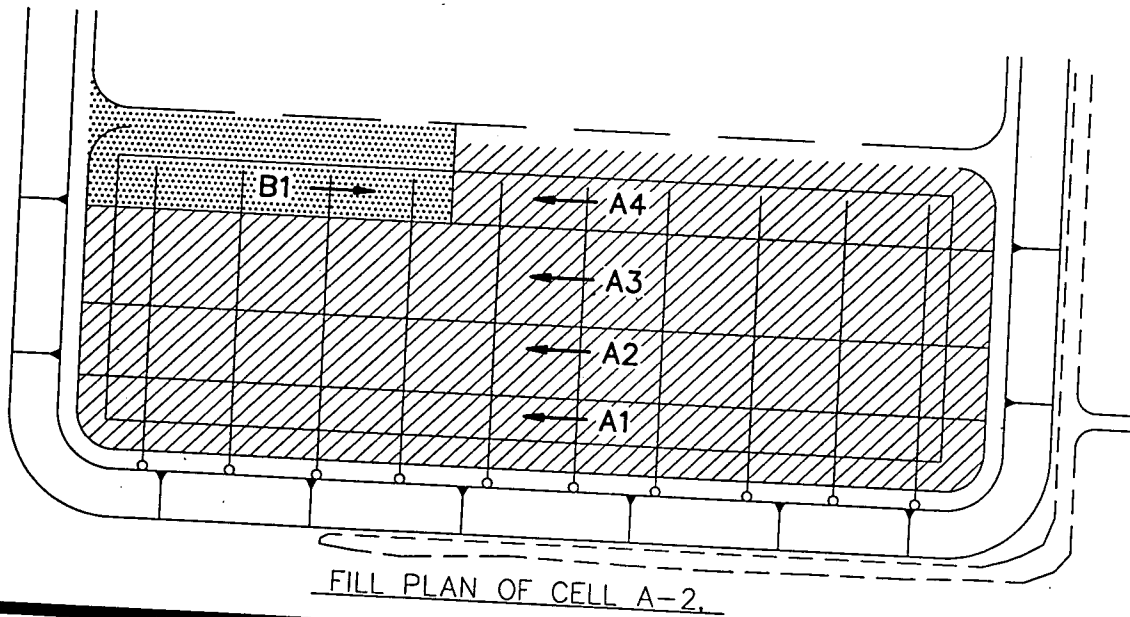
Alcor Port & Chey

Recirculation is not approved



LEGEND

-  LIFT A
-  LIFT B
-  FILL DIRECTION



NOT TO SCALE

PASCO COUNTY
BOARD OF COUNTY COMMISSIONERS
UTILITY SERVICES BRANCH
RESOURCE RECOVERY FACILITY
PASCO COUNTY, FLORIDA



LAW
ENGINEERING AND ENVIRONMENTAL SERVICES

Prepared/Date: JFW 01/29/98
Checked/Date:

MODIFIED LIFT A SEQUENCE
SCHEMATIC FOR CELL A-2

Project 40141-7-0317 Figure 8.2A

Transmit Confirmation Report

No. : 005
Receiver : 9-289-5474
Transmitter : WASTE MGT TAMPA SWDIST
Date : Feb 06 98 10:25
Time : 06'13
Mode : Norm
Pages : 11
Result : OK

WASCO

~~REDACTED~~

PHOTOS

12/11/97,
1/8/98,
2/11/98.

102



SALT BAGS
A-2

— WEST PASCO
JBF, RJB —

RONAIR 16
SW-1

— WEST PASCO
KBF, RJB —



PONDING
SW-1

— WESTPASCO
KBF, RJB —

A-2

— WEST PASCO
KBF, RJB —



— WEST PASCO
KBF, RJB —

LEACHATE
HOSE
LEACH
A-1 TO
A-2

— WEST PASCO
KBF, RJB —

EROSION
A-1

— WEST PASCO
KBF, RJB —

Boys AB
Allison AA

S. E. E. R.6902 7th AVENUE EAST * TAMPA, FL. 33619

FACSIMILE TRANSMITTAL SHEET

TO: <i>Kim Ford</i>	FROM: <i>Mike Flynn</i>
COMPANY: <i>DEP</i>	DATE: <i>2/5/98</i>
FAX NUMBER: <i>744-6125</i>	TOTAL PAGES INCLUDING COVER: <i>2</i>
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE: <i>Electronic Recycling</i>	YOUR REFERENCE NUMBER:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☒ Please Recycle

NOTES/COMMENTS:

FYI

Secure Environmental Electronic Recycling (S.E.E.R.)

PHONE (813) 621-8870 • 888-600-SEER • FAX (813) 621-5457

8503 Sunstate Street
Tampa, FL 33634
Permit # HQ29-274025
Phone: (813)249-0608
Fax: (813)249-1233

Quicksilver Environmental, Inc.

February 3, 1998

Mr. Vincent Mannella, P.E.
Solid Waste Facility Manager
7536 State Street
New Port Richey, FL 34654

REF: 10 million gallons of Leachate

Dear Vincent:

Quicksilver Environmental, Inc. (Q.E.) is pleased to make the following proposal to transport and treat not less than 10 million gallons of leachate from the West Pasco Class III Landfill.


The leachate is to be loaded on our tank trucks, approximately 5,500 gallons per truck, by the county unless other arrangements are made (2) hours free loading time, \$75.00 per hour thereafter. The leachate will be transported to International Processing Specialists, Inc. in Jacksonville, FL for proper treatment according to the rules and regulations of the Department of Environmental Protection (DEP) and discharged.

The cost for the county is \$ 0.19 per gallon. This cost is inclusive of labor, materials, transportation, insurance's, and treatment. Time to completion is 100 days per 10 million gallons.

Quicksilver Environmental Inc. will take title to the leachate and all risks of loss at the time the tanker leaves the loading area at the landfill.

This proposal is contingent upon completion of necessary paperwork and successful treatment of a representative sample of the leachate.

Sincerely,


William M. Flynn
President

cc: Doug Bramlett
Farouk El Shamy

FDEP

3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

~~FAXED~~

Date:

2/6/98

Number of pages including cover sheet:

3

To:

Dickmayer
LAW FIRM

Phone:

289 0750

Fax phone:

289 5474

CC:

From:

Jim Ford

Phone:

(813) 744-6100

x382

Fax phone:

(813) 744-6125

REMARKS:



Urgent



For your review

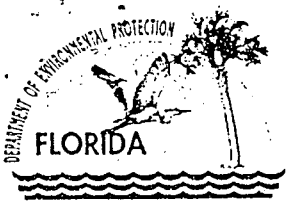


Reply ASAP



Please comment

W PASCO



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
and via FAX

February 5, 1997

Mr. Douglas Bramlett
Assistant County Administrator
Utilities Bldg. S-213
7530 Little Road
New Port Richey, FL 34654

Re: West Pasco Landfill Corrective Actions, Pasco County...

Dear Mr. Bramlett:

As the Department continues to observe Pasco County's efforts to correct the leachate management problems at the landfill, the conditions worsen. The amount of rainfall in December has contributed to a seemingly impossible situation. The leachate levels in disposal units A-1 and A-2 are threatening to overtop the landfill berms. Therefore, the Department strongly suggests implementation of all of the following:

1. Pasco County should continue off-site disposal (60,000 gpd at Tampa WWTP) and on-site treatment (the maximum volume possible when available, and a minimum 20,000 gpd) 7 days per week, and 24 hours per day if required.
2. Within 7 days of receipt of this letter, Pasco County should also begin removal of at least 100,000 gallons per day to another off-site disposal facility such as one with underground injection or a mixing zone subject to Department approval. This increased removal should continue until the facility returns to compliance.
3. Pasco County should fill in disposal unit A-2, regrade it and cover it (or most of it) with a geomembrane to prevent stormwater infiltration by collecting it on top of the liner and pumping it off or sloping the top to drain it off.

With removal and disposal of 180,000 gpd (60,000 Tampa WWTP, 20,000 on-site LTP and 100,000 to other disposal facilities), 18,000,000 gallons would be removed within 100 days allowing ash to be regraded and covered to prevent future excessive leachate generation. As an effort to avoid the discharge of ash leachate outside the lined landfill, the Department expects these corrective actions to be completed by June 1, 1998.

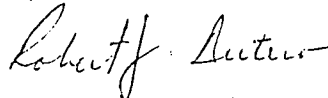
Mr. Douglas Bramlett
Pasco County

February 5, 1998
Page Two

The intent of this letter is to address only the corrective actions necessary for the reduction of leachate to assure that no discharge occurs.

If you have any questions you may call me at (813) 744-6100, extension 451.

Sincerely,



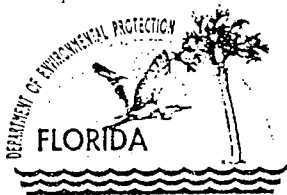
Robert J. Butera, P.E.
Solid Waste Manager
Division of Waste Management

KBF/ab

cc: John Gallagher, Pasco County
Vince Mannella, P.E., Pasco County
Richard Garrity, Ph.D., FDEP Tampa
William Kutash, FDEP Tampa
Richard Tedder, FDEP Tallahassee
Mary Jean Yon, FDEP Tallahassee
Chris McGuire, OGC, FDEP Tallahassee
Kim Ford, P.E., FDEP Tampa
Steve Morgan, FDEP Tampa

Transmit Confirmation Report

No.	:	019
Receiver	:	818132895474
Transmitter	:	WASTE MGT TAMPA SWDIST
Date	:	Feb 06 98 18:49
Time	:	01'46
Mode	:	Norm
Pages	:	03
Result	:	OK



Department of Environmental Protection

Handwritten: Hanged
your copy
fyi

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
and via FAX



Department of Environmental Protection

Handwritten: Judy R
your copy
fyi

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
and via FAX



Department of Environmental Protection

Handwritten: to S.
your copy
fyi

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
and via FAX

February 5, 1997

Mr. Douglas Bramlett
Assistant County Administrator
Utilities Bldg. S-213
7530 Little Road
New Port Richey, FL 34654

Re: West Pasco Landfill Corrective Actions, Pasco County

Dear Mr. Bramlett:

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FDEP	3804 Coconut Palm Drive, Tampa, FL 33619-8318
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FDEP	3804 Coconut Palm Drive, Tampa, FL 33619-8318
------	---

FAXED

Date: 2-6-98

Number of pages including cover sheet: 3

Date: 2-6-98

Number of pages including cover sheet: 3

To: Doug Bramlett

Phone: 813 847-8145
Fax phone: 813 847 8064
CC:

Phone: 813 847-8145
Fax phone: 813 847 8064
CC:

Phone: 813 847-8145
Fax phone: 813 847 8064
CC:

From: Bob Butera

Phone: (813) 744-6100

Fax phone: (813) 744-6125

Phone: (813) 744-6100

Fax phone: (813) 744-6125

~~1~~

☐ For your review☐ Reply ASAP

☐ Please comment

[illegible]



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
and via FAX

February 5, 1997

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Assistant County Administrator
Utilities Bldg. S-213
7530 Little Road
New Port Richey, FL 34654

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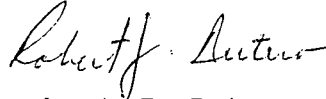
Mr. Douglas Bramlett
Pasco County

February 5, 1998
Page Two

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Sincerely,



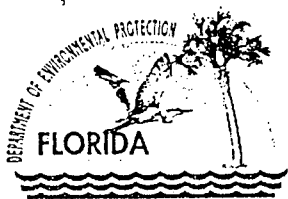
Robert J. Butera, P.E.
Solid Waste Manager
Division of Waste Management

KBF/ab

cc: John Gallagher, Pasco County
Vince Mannella, P.E., Pasco County
Richard Garrity, Ph.D., FDEP Tampa
William Kutash, FDEP Tampa
Richard Tedder, FDEP Tallahassee
Mary Jean Yon, FDEP Tallahassee
Chris McGuire, OGC, FDEP Tallahassee
Kim Ford, P.E., FDEP Tampa
Steve Morgan, FDEP Tampa

Transmit Confirmation Report

No. : 014
Receiver : 8-1-813-847-8064
Transmitter : WASTE MGT TAMPA SWDIST
Date : Feb 06 98 16:54
Time : 01'50
Mode : Norm
Pages : 03
Result : OK



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
and via FAX

February 5, 1997

Mr. Douglas Bramlett
Assistant County Administrator
Utilities Bldg. S-213
7530 Little Road
New Port Richey, FL 34654

Re: West Pasco Landfill Corrective Actions, Pasco County..

Dear Mr. Bramlett:

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Is your RETURN ADDRESS completed on the reverse side?

SENDER: WEST PASCO LANDFILL

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. ☐ Addressee's Address
- 2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Doug Bramlett
Asst. County Adm.
1530 Little Rd
Newport Richey, FL 34654

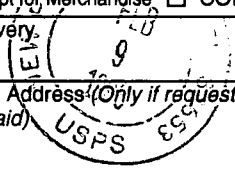
4a. Article Number

P 520 310 308

4b. Service Type

- ☐ Registered
- ☐ Express Mail
- ☒ Return Receipt for Merchandise
- ☒ Certified
- ☐ Insured
- ☐ COD

7. Date of Delivery.



5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



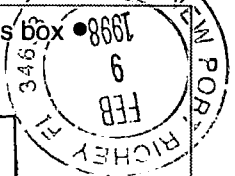
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

Print your name, address, and ZIP Code in this box

RECEIVED
FEB 10 1998
Deparu...
BY

SOUTHWEST DISTRICT
TO ACTION

State of Florida
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8318



Bob Butera - Solid Waste

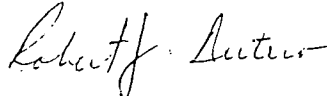
Mr. Douglas Bramlett
Pasco County

February 5, 1998
Page Two

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Sincerely,



Robert J. Butera, P.E.
Solid Waste Manager
Division of Waste Management

KBF/ab

cc: John Gallagher, Pasco County
Vince Mannella, P.E., Pasco County
Richard Garrity, Ph.D., FDEP Tampa
William Kutash, FDEP Tampa
Richard Tedder, FDEP Tallahassee
Mary Jean Yon, FDEP Tallahassee
Chris McGuire, OGC, FDEP Tallahassee
Kim Ford, P.E., FDEP Tampa
Steve Morgan, FDEP Tampa

P 520 310 308

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>Douglas Bramlett</i>	
Street & Number <i>Pasco County</i>	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>2-6-98</i>	

PS Form 3800, April 1995



PASCO COUNTY, FLORIDA

RECEIVED
FEB 04 1998
Department of Environmental Protection
SOUTHWEST DISTRICT

DADE CITY
LAND O' LAKES
NEW PORT RICHEY
FAX

(352) 521-4274
(813) 996-7341
(813) 847-8145
(813) 847-8064

UTILITIES SERVICES BRANCH
PUB./WKS./UTILITIES BLDG., S-213
7538 LITTLE ROAD
NEW PORT RICHEY, FL 34654

February 2, 1998

Mr. Richard D. Garrity, Ph.D.
Director of District Management
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33610-8318

RE: Certified Letter of January 20, 1998

Dear Dr. Garrity:

I regret the late response to our letter referenced above, but an unusual event at the Pasco County Resource Recovery Facility, the result of which took some major time to resolve, temporarily delayed my response.

Item No. 1: Pasco County is forwarding copies of all leachate quantities, on a daily basis, via Fax to the Florida Department of Environmental Protection (FDEP).

Item No. 2: Changes to the manholes and valves in engineering drawings have been sent to the FDEP by Law Engineering and Environmental Services. Pasco County has, at the FDEP's request, installed a staff gauge and is reporting daily readings to the FDEP. Pasco County cannot determine leachate volume based on staff gauge readings. The irregular periphery and bottom of the cell makes volume calculation impossible. However, it is computed that Cells A-1 plus A-2 contained approximately 23,000,000 gallons of leachate. Rainfall since December 11, 1997 through December 31, 1997 totaled 14.0 inches; for January 1998 a total of 10.7 inches was recorded. The recorded rainfall of 24.7 inches will yield an additional volume of 7,982,806 gallons, or a total of 30.98 million gallons, including the 2 million in Crom Tank.

Mr. Richard D. Garrity, Ph.D.
February 2, 1998

Item No. 3: The plans and specifications for covering Cell A-1 are out for bid, with bids to be received on February 5, 1998. The bid award and construction will be implemented with all dispatch. The covering of Cell A-2 is under discussion with Law Engineering and Environmental Services and Pasco County. The covering of Unit A-2 will be placed on high priority for completion as soon as possible. The covering is, of course, subject to:

- A) uncovered areas required for roadways for ash placement in the cells, and
- B) the area under leachate cannot be covered until such time as the leachate in Cell A-2 permits exposure of the cells surface.

Pasco County has a serious concern with the cells over topping (A-1 and A-2) and we are monitoring the freeboard on both cells. Be advised that the freeboard on Cell A-1 is 3'7", the freeboard on Cell A-2 is 2'25". The covering of Cell A-1 will be placed on an emergency basis which will eliminate 50% of all future leachate generated; the covering of Cell A-2 will be resolved as soon as practical application can be implemented, as noted above in Conditions A and B.

Item No. 4: Yard trash is presently being mulched and spread on haul roads. This procedure will continue until all stocked mulch is spread or hauled to Pasco County parks.

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The following comments are in response to the "Solid Waste Management Facility Checklist" which was attached in your letter.

Number 11: Operations revised, plan has been submitted.

Mr. Richard D. Garrity, Ph.D.
February 2, 1998

Number 17: This item has been covered in Revised Operations Plan.

Number 18: Please refer to Items 11 and 17 above.

Number 21: Please refer to Items 11, 17, and 18 above.

Number 24: Please refer to Items 11, 17, 18, and 21 above.

Number 38: The wash-out at the culvert have been repaired.

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Number 46: Leaking leachate hose repaired.

Number 47: Storm water ponded on Unit A-1, Pasco County constructed a small berm to slow run-off on east slope of unit preventing massive erosion problems from reoccurring.

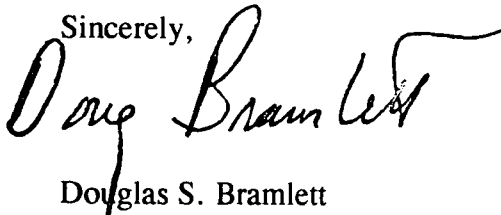
Number 52: All washouts have been repaired.

I appreciate your understanding to bring Pasco County's site into full compliance as soon as possible. Please permit me to assure you we are making every effort to do so within County operating procedures with the Board of County Commissioners's cooperation and approval. I do not believe site conditions are going contrary to this goal. The County's progress is moving as rapidly as permitted and we have aggressively transported more than 1,000,000 gallons of leachate to the two WWTPs that permit us to do so. Further, the designers and constructors of the County's Leachate Management Facility are on-site making major modifications to the plant and start-up is in the immediate near future.

Mr. Richard D. Garrity
February 2, 1998

I trust all matters contained in your letter have been addressed. It is my belief and understanding that we both, the FDEP and Pasco County, are working diligently toward a final solution to this problem. We again request permission to pump (trickle feed) approximately 30,000 gpd of ash leachate to the Shady Hills WWTP under our current Consent Agreement.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Bramlett", with a stylized flourish at the end.

Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv/18/garrity

cc: Robert J. Butera, P.E. III, Division of Waste Management, FDEP, Tampa, FL
Kim B. Ford, P.E. I, Division of Waste Management, FDEP, Tampa, FL
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager
Ronald Walker, Solid Waste Superintendent

FDEP

3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

FAXED

Date:

2/4/98

Number of pages including cover sheet:

3

To:

Dickmayer

LAW ENG

Phone:

289 0750

Fax phone:

289 5474

CC:

From:

Kim Roas

Phone:

(813) 744-6100

x 382

Fax phone:

(813) 744-6125

REMARKS:

☐ Urgent

☒ For your review

☒ Reply ASAP

☐ Please comment

DEPs 2/4/98 Response
to the ops plan changes
for



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

February 4, 1998

Mr. Richard Mayer, P.E.
Law Engineering
4919 W. Laurel Street
Tampa, FL 33607

RE: West Pasco Landfill Operations Plan

Dear Mr. Mayer:

Based on a review of the January 1998 Operations Plan addendum received January 30, 1998, the Department requests clarification on several items as follows:

1. **Section 1.1.** Please provide copies of any documents of Department authorization to place the chloride bags in the west end of A-2. The Department is unaware of any authorization to place chloride bags or ash in the west end of A-2. What specifically has been done to seek a contract for off-site disposal of chloride bags?
2. **Section 1.2.** What is the basis for the County's decision to allow leachate to accumulate in A-1? The Department has advised the County to continue to pump leachate from A-1 (primary and secondary systems) to A-2. Why is the existing cover on A-1 not promoting run-off as it was intended to? Why has the County stopped hauling leachate to the New Port Richey WWTP?
3. **Section 3.1.** Please provide a specific grading plan for items 1 and 2 in this section including cross-sections with slopes and elevations to promote stormwater runoff. Please describe an improved method of placing the chloride bags to prevent damage.
4. **Section 3.1, 8.2.6.** References to detailed cross-sections for filling are requested.
5. **Section 3.1, 8.2.7.** Wood chips as cover are not approved and should be deleted.
6. **Section 3.1, 8.2.8.** This section should be changed for revised gas vent details that may be required and reference to the Shady Hills WWTP.

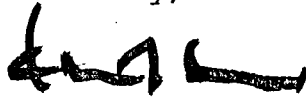
Mr. Richard Mayer, P.E.
Law Engineering

February 4, 1998
Page Two

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9. **Section 3.1, 8.8.2.** Please provide a copy of Appendix A5.4.
10. **Section 3.1, 8.8.3.** This section should be changed for reference to Shady Hills WWTP.
11. **Section 3.1, 8.8.4.** Please provide copies of agreements for a two (2) year period for transporting ash leachate and each off-site WWTP to be used for disposal. These agreements should include the maximum amounts to be transported and for disposal by each WWTP, and identify all limitations such as the hours per day or days per week. The Department continues to expect the maximum amount of ash leachate to be removed for off-site disposal at the New Port Richey WWTP (12,000 gpd) and Tampa WWTP (60,000 gpd) until leachate compliance levels are maintained. What effort is the County making to increase off-site disposal at these facilities and to others?
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13. **Section 3.1, 8.8.6.** Recirculation of ash leachate into disposal unit A-2 is not approved as an ongoing contingency plan but only as required to prevent a catastrophic event such as the discharge of ash leachate from A-1.

Please provide a comprehensive operations plan updated to include all changes. On all future correspondence, please include Robert Butera on distribution. If you have any questions you may call me at (813) 744-6100, extension 382.

Sincerely,



Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management

KBF/ab

cc: Douglas Bramlett, Pasco County
Vince Mannella, P.E., Pasco County
Robert Butera, P.E., FDEP Tampa



Transmit Confirmation Report

No. : 022
Receiver : 9-289-5474
Transmitter : WASTE MGT TAMPA SWDIST
Date : Feb 04 98 17:45
Time : 01'32
Mode : Norm
Pages : 03
Result : OK



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

February 4, 1998

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Law Engineering
4919 W. Laurel Street
Tampa, FL 33607

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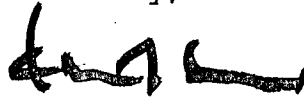
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February 4, 1998
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Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management

KBF/ab

cc: Douglas Bramlett, Pasco County
Vince Mannella, P.E., Pasco County
Robert Butera, P.E., FDEP Tampa



FDEP

3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

FAXED

Date:

2/4/98

Number of pages including cover sheet:

218

To:

Mary Jean

RICHARD TEDDER

CHRIS MCGUIRE

Phone:

Fax phone:

CC:

From:

Fun Foods x382

BOB BURGER x451

Phone:

(813) 744-6100

x

Fax phone:

(813) 744-6125

REMARKS:

☒ Urgent

☒ For your review

☒ Reply ASAP

☐ Please comment

WE ARE LOOKING FOR INPUT FOR OUR
DRAFT RESPONSE FROM VIRGINIA AS REQUESTED

ALSO HERE'S A BRIEFING SUMMARY
SENT TO VIRGINIA LAST WEEK.

(ALSO 2 OTHER LETTERS

1. INSPECTION OF GARRITY LETTER - JAN 20, 1998
2. BRAMLEY RESPONSE - FEB 2, 1998

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Correspondence Control

Correspond Number	Date Received	Date Written	Subject Reference	Date Due
SW-00265	01/29/98	01/23/98	Gulf disposal	02/09/98

Name: Andrew Vogt
Affiliated Organization: Solid Waste Mgt Cit Adv Council
Address: P.O. Box 384

City/State/Zip: Port Richey, FL 34673
Phone: 813-842-2424

AffiliationType: Other
Secretary's Ref: EO-00715
Assigned to: Waste Management
County: Pasco
Category: Environmental Impacts
Rules:

INSTRUCTIONS: Prepare Response for VW
Prepare in final form, a reply for the signature of Virginia Wetherell.

COMMENTS: Assigned to Bill Kutash.

RESPONDED ON: / /

facsimile
TRANSMITTAL

to: Sandra Lynch / Southwest District Office
fax #: 542-6084
re: Correspondence Control
date:
pages: 5, including this cover sheet.

From the desk of...

Tocoi Arthur
Administrative Assistant II
Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399

291-1222
Fax: 277-3267

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Office of the Secretary Correspondence Control

Correspond Number	Date Received	Date Written	Subject Reference	Date Due
EO-00715	01/27/98	01/23/98	gulf disposal	02/10/98
Name: Andrew Vogt Affiliated Organization: Solid Waste Mgt Cit Adv Council Address: P.O. Box 384 City/State/Zip: Port Richey, FL 34673 Phone: 813-842-2424			AffiliationType: Other Governor's Ref: SW DIST Assigned to: Waste Management County: Pasco Category: Environmental Impacts Rules:	
INSTRUCTIONS: Prepare Response for VW Prepare in final form, a reply for the signature of Virginia Wetherell. Return to Jack Pons.				
COMMENTS: policy issue - [signature]				
Assigned by Jack Pons, Office of the Secretary			Phone: 487-0940 SC: 277-0940	

RECEIVED
JAN 27 1998
DIVISION OF
WASTE MANAGEMENT

SOLID WASTE MANAGEMENT CITIZENS ADVISORY COMMITTEE

Andrew C. Vogt
P.O. 384
Port Richey
Florida 34673
(813) 842-2424
Jan. 23 1998

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

JAN 27 1998

OFFICE OF THE SECRETARY

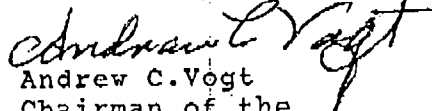
Ms. Virginia Wetherell
Secretary, F.I.D.E.P.
3900 Commonwealth Blvd.
Tallahassee
Fl. 32399

Dear Ms. Wetherell;

As an appointed citizens advisory committee to the Pasco County Board of Commissioners we are interested in the feasibility of gulf disposal of our dehydrated end product of our Leachate Recovery Facility which is located in Shady Hills, Pasco County, Florida. The material is non-toxic as shown in the enclosed two page analysis. We wish to make this recommendation in deference to our current land fill procedure because of limited space.

To this end we are inquiring as to the appropriateness of such an action. If this matter does not fall within the purview of Florida D.E.P. we would appreciate a response so stating. However if this matter is within the purview of Florida D.E.P. we would appreciate the reference source and any additional information you would care to share with us.

Yours truly



Andrew C. Vogt
Chairman of the
Solid Waste Management
Citizens Advisory Committee.

cc; Douglas Bramlett
Assistant County Administrator
(Utilities Services)



PASCO COUNTY, FLORIDA

ENVIRONMENTAL LABORATORY
8864 GOVERNMENT DRIVE
NEW PORT RICHEY, FL 34654
(813) 847-8902

REPORT OF ANALYSES

RESOURCE RECOVERY
14230 HAYS ROAD
SPRING HILL, FL 34610-
Attn: VINCENT MANNELLA

PROJECT NAME: RES REC LEACHAT
DATE: 01/08/98
DHRS # 44237, E44123

SAMPLE NUMBER- 63256 SAMPLE ID- PRIMARY LEACHATE
DATE SAMPLED- 12/24/97 LOCATION-
DATE RECEIVED- 12/24/97 SAMPLER- JAMES HOFFMAN
TIME RECEIVED- 1055 DELIVERED BY- JIM HOFFMAN

SAMPLE MATRIX- LE
TIME SAMPLED- 0900
RECEIVED BY- AS

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP DATE	ANALYSIS BY DATE	TIME	BY	RESULT	UNITS
CHLORIDE	EPA 325.2	01/05/98	TER 01/07/98	1100	JK	20558	mg/L
BIOCHEM. OXY. DEMAND	SM5210B	12/24/97	TER 01/07/98	1300	CEM	436	mg/L
KJELDAHL NITROGEN	4500NorgB	12/24/97	TER 01/07/98	1500	TER	10.2	mg/L
PH, LAB	EPA150.1	12/24/97	TER 01/07/98	1145	JK	7.52	std units
TOTAL SUSP. SOLIDS	EPA160.2	12/24/97	TER 01/07/98	1300	CEM	34	mg/L
ARSENIC, TOTAL	206.2	01/05/98	TER 01/07/98	1240	TER	<0.01	mg/L
CADMIUM, TOTAL	213.2	01/05/98	TER 01/07/98	1400	TER	0.15	mg/L
CHROMIUM, TOTAL	218.2	01/05/98	TER 01/07/98	1040	TER	<0.01	mg/L
COPPER, TOTAL	220.2	01/05/98	TER 01/07/98	0910	TER	0.28	mg/L
LEAD, TOTAL	239.2	01/05/98	TER 01/07/98	1115	TER	<0.01	mg/L
NICKEL, TOTAL	249.2	01/05/98	TER 01/07/98	0935	TER	1.19	mg/L
SELENIUM, TOTAL	270.2	01/05/98	TER 01/07/98	1330	TER	<0.01	mg/L
SILVER, TOTAL	272.2	01/05/98	TER 01/07/98	1415	TER	0.31	mg/L
ZINC, TOTAL	289.1	01/05/98	TER 01/07/98	0920	TER	0.15	mg/L

LABORATORY DIRECTOR

A handwritten signature in black ink, appearing to read "C. E. Miller", is written over a horizontal line.



PASCO COUNTY, FLORIDA

ENVIRONMENTAL LABORATORY
8864 GOVERNMENT DRIVE
NEW PORT RICHEY, FL 34654
(813) 847-8902

REPORT OF ANALYSES

RESOURCE RECOVERY
14230 HAYS ROAD
SPRING HILL, FL 34610-
Attn: VINCENT MANNELLA

PROJECT NAME: DEMIN/LEACHATE
DATE: 01/08/98
DHRS #: 44237, E44123

SAMPLE NUMBER- 63254 SAMPLE ID- A-1 PRIMARY LEACHATE
DATE SAMPLED- 12/24/97 LOCATION- NOT SPECIFIED
DATE RECEIVED- 12/24/97 SAMPLER- WALTER DRADRANSKY
TIME RECEIVED- 1040 DELIVERED BY- W DRADRANSKY

SAMPLE MATRIX- LE
TIME SAMPLED- 0900
RECEIVED BY- AS

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP DATE	ANALYSIS BY DATE	TIME	BY	RESULT UNITS
CHLORIDE	EPA 325.2		01/05/98	1100	JK	45733 mg/L
NITRATE	EPA 353.2		12/30/97	1600	IF	<0.11 mg/L
TOTAL DISS.SOLIDS	EPA160.1		12/24/97	1400	JK	100000 mg/L
SPEC.CONDUCTIVITY	EPA120.1		12/24/97	1045	JK	103200 umhos
SODIUM,TOTAL	273.1	01/05/98	TER 01/05/98	1100	TER	11200 mg/L

LABORATORY DIRECTOR

A handwritten signature in black ink, appearing to read "Vincent Mannello", is written over a horizontal line.

Date: 1/22/98 11:25:35 AM
From: Robert Butera TPA
Subject: Topic for Rick's Meeting for the Secretary - Solid Waste
To: Norton Mac Craig TPA
CC: William Kutash TPA
CC: Kim Ford TPA
CC: Steve Morgan TPA

Pasco County Landfill - Substantial lack of compliance at the West
Pasco Class I Landfill (Cells A-1, A-2, and SW-1.

Pasco County opened 10 acres of landfill area (an area that was segmented in thirds) such that rainfall accumulating on segments, not disposed in, should have been treated as stormwater. The County disposed in all zones thereby subjecting the whole area to leachate prior to requesting approval from the Department. This process was implemented and not approved by the Department. The Department strongly advised against such action, however the county insisted that the new Leachate Treatment Plant could handle all leachate generated.

The new Leachate Treatment Plant permit issued in 1996 required construction completion by March 1, 1997. The Leachate Treatment Plant was shut down in June of 1997 due to significant operational problems and has not been used since then.

Due to the ongoing rainfall and significant noncompliance issues the ash disposal cell (A-2) has over 20,000,000 gallons of leachate. The leachate head on the liner exceeds the maximum one foot depth as required by the Department's Solid Waste Rule (F.S. 62-701). Leakage rates increase exponentially with head over the liner. The current head appears to be 13 feet.

Pasco County is currently hauling 50,000 gallons of leachate per day to two WWTP's. At this rate of hauling the landfill could be out of compliance for years due to additional rainfall and inadequate quantities of leachate being hauled. Pasco County has refused to haul leachate long distances which is routinely practiced at other solid waste facilities in their efforts to be in compliance.

This only addresses the most significant violation at the site. There are others including impounded leachate in Cell SW-1.

I can provide for Rick supporting documentation such as an inspection report, Rick's letter to John Gallagher, etc.



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
 LAND O' LAKES (813) 996-7341
 NEW PORT RICHEY (813) 847-8145
 FAX (813) 847-8064

UTILITIES SERVICES BRANCH
 PUB. WKS./UTILITIES BLDG., S-213
 7530 LITTLE ROAD
 NEW PORT RICHEY, FL 34654

February 2, 1998

Mr. Richard D. Garrity, Ph.D.
 Director of District Management
 Florida Department of
 Environmental Protection
 3804 Coconut Palm Drive
 Tampa, FL 33610-8318

Post-it Fax Note 7671		Date 2/4	# of pages 4
To R. Butera	From D. Brankett		
Co./Dept. FDEP	Co. PCVSB		
Phone #	Phone # 847-8145		
Fax # 744-6125	Fax #		

RE: Certified Letter of January 20, 1998

Dear Dr. Garrity:

I regret the late response to our letter referenced above, but an unusual event at the Pasco County Resource Recovery Facility, the result of which took some major time to resolve, temporarily delayed my response.

Item No. 1: Pasco County is forwarding copies of all leachate quantities, on a daily basis, via Fax to the Florida Department of Environmental Protection (FDEP).

Item No. 2: Changes to the manholes and valves in engineering drawings have been sent to the FDEP by Law Engineering and Environmental Services. Pasco County has, at the FDEP's request, installed a staff gauge and is reporting daily readings to the FDEP. Pasco County cannot determine leachate volume based on staff gauge readings. The irregular periphery and bottom of the cell makes volume calculation impossible. However, it is computed that Cells A-1 plus A-2 contained approximately 23,000,000 gallons of leachate. Rainfall since December 11, 1997 through December 31, 1997 totaled 14.0 inches; for January 1998 a total of 10.7 inches was recorded. The recorded rainfall of 24.7 inches will yield an additional volume of 7,982,806 gallons, or a total of 30.98 million gallons, including the 2 million in Crom Tank.

Mr. Richard D. Garrity, Ph.D.

February 2, 1998

Item No. 3: The plans and specifications for covering Cell A-1 are out for bid, with bids to be received on February 5, 1998. The bid award and construction will be implemented with all dispatch. The covering of Cell A-2 is under discussion with Law Engineering and Environmental Services and Pasco County. The covering of Unit A-2 will be placed on high priority for completion as soon as possible. The covering is, of course, subject to:

A) uncovered areas required for roadways for ash placement in the cells, and

B) the area under leachate cannot be covered until such time as the leachate in Cell A-2 permits exposure of the cells surface.

Pasco County has a serious concern with the cells over topping (A-1 and A-2) and we are monitoring the freeboard on both cells. Be advised that the freeboard on Cell A-1 is 3'7", the freeboard on Cell A-2 is 2'25". The covering of Cell A-1 will be placed on an emergency basis which will eliminate 50% of all future leachate generated; the covering of Cell A-2 will be resolved as soon as practical application can be implemented, as noted above in Conditions A and B.

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February 2, 1998

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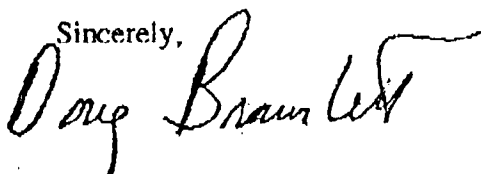
Number 52: All washouts have been repaired.

I appreciate your understanding to bring Pasco County's site into full compliance as soon as possible. Please permit me to assure you we are making every effort to do so within County operating procedures with the Board of County Commissioners's cooperation and approval. I do not believe site conditions are going contrary to this goal. The County's progress is moving as rapidly as permitted and we have aggressively transported more than 1,000,000 gallons of leachate to the two WWTPs that permit us to do so. Further, the designers and constructors of the County's Leachate Management Facility are on-site making major modifications to the plant and start-up is in the immediate near future.

Mr. Richard D. Garrity
February 2, 1998

I trust all matters contained in your letter have been addressed. It is my belief and understanding that we both, the FDEP and Pasco County, are working diligently toward a final solution to this problem. We again request permission to pump (trickle feed) approximately 30,000 gpd of ash leachate to the Shady Hills WWTP under our current Consent Agreement.

Sincerely,



Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv/18/garrity

cc: Robert J. Butera, P.E. III, Division of Waste Management, FDEP, Tampa, FL
Kim B. Ford, P.E. I, Division of Waste Management, FDEP, Tampa, FL
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager
Ronald Walker, Solid Waste Superintendent



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 20, 1998

Mr. Doug Bramlett
Pasco County Utilities
7530 Little Road
New Port Richey, FL 34654

Re: West Pasco Landfill

Dear Doug;

On January 8, 1998, Bob Butera and Kim Ford visited the West Pasco Landfill site and observed a number of new problems as well as old issues which have worsened since our last meeting. Please review the attached site inspection for January 8, 1998 and explanations listed on the third page of the inspection form. You are requested to respond with a schedule for corrective actions of non-compliance items noted during the inspection not specifically addressed below within 10 days.

In addition to the site operation problems noted on the January 8, 1998 inspection report, there are several other related activities and items which are of concern to the Department which require your attention:

1. Attached are the spreadsheets for recording leachate quantities discussed at our December 11, 1997 meeting. The Department requested that this information as indicated on the sheets be updated and provided by FAX to the Department each week on Friday for all days through the previous Wednesday. Hard copies of the completed form were to follow by mail at the end of each month. This submittal has not taken place and should be initiated.
2. During the December 11, 1997 meeting, the issue of changes to the manholes and valves for disposal unit A-1 were discussed and the Department requested record drawings for the changes to the manholes and valves for disposal unit A-1, and the estimated quantity of leachate in disposal unit A-2 updated daily based on staff gauge readings. The December 19, 1997 letter from Law Engineering officially notifies the Department of the changes, but failed to include the requested record drawing. The Department has also not received the requested staff gauge readings. These submittals should be provided to the Department. As a result of the recent inspection, an estimate of the volume of leachate impounded in SW-1 should also be included.

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

Printed on recycled paper.

3. Pasco County's Task Order 1-98 dated November 1997 instructed Law Engineering to prepare an operations plan to include filling procedures and possibly the use of a rain tarp to limit rainfall infiltration in inactive areas of Cell A-2 within 30 days. The descriptive plan for the use of a rain tarp from Law Engineering dated January 5, 1998 lacks sufficient design detail and supporting documentation to provide reasonable assurance that future rain events in 1998 can be properly controlled and leachate minimized. Immediate and detailed filling and grading plans for corrective actions and revised operations plan for compliance to prevent reoccurrence is required for Department review. Department staff believes that unless most of the entire disposal unit A-2 is covered with a rain tarp by June 1, 1998 (the beginning of the rainy season) there is a serious threat of overtopping the liner which would cause a discharge of ash leachate. The Department's Warning Notice dated November 18, 1997 and letter dated November 21, 1997 requested specific plans for corrective action. To date the County has not included methods that would reasonably assure the Department of corrective actions to prevent further violations. In addition to the design plans, supporting documents shall include future rain and leachate projections and calculations for leachate generation rates in response to anticipated rainfall. All the aforementioned submittals are required for Department review and disposition and should be provided within the next 10 days.
4. Yard trash accepted at the site shall be processed and recycled, or disposed of within twelve months. This permit condition in the current Class III landfill permit has not been complied with. The Department has no objection to the December 18, 1997 Yard Trash Management Plan and anticipates compliance within the next few months.
5. At our meeting on December 11, 1997, I believe the County committed to transporting 12,000 gpd immediately increasing to 60,000 gpd of ash leachate to the Tampa WWTP and 12,000 gpd to the New Port Richey WWTP by mid-January. To date, records indicate a maximum of only 24,000 gpd to Tampa on two days only in December since the meeting and 18,000 gpd on one day only to New Port Richey, and on most days much less or none at all. The Department requests an explanation of this shortfall in corrective action which the County committed to initiate and an indication of your ability to meet your commitments to remove and transport the ash leachate in the future.

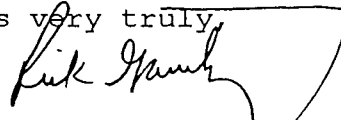
Mr. Doug Bramlett
Pasco County Utilities

January 20, 1998
Page Three

Administrative procedures such as permit modifications have not been followed for ongoing site changes. Understandably, some issues have a greater need for a quick response and Department staff have proven their ability to meet and resolve these urgent issues in a cooperative and timely manner. It is the duty of Department staff to provide technical assistance as is consistently provided for all permittees, on all issues that may impact ongoing regulated activities.

I bring these matters to your direct attention because I believe you and Mr. Gallagher's intentions are to come into full compliance as quickly as possible. However, the Department is very concerned that conditions at this site appear to be going in the opposite direction and the County's progress does not appear to be as aggressive as the situation warrants. As a result, the County may soon be faced with conditions which may take years to correct. I request that you contact Bob Butera immediately to resolve these issues and provide a specific schedule to implement all corrective actions required to bring site into compliance.

Yours very truly,



Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/kbfb
Attachments

cc: John Gallagher, Pasco County
Vince Mannella, Pasco County
Robert Butera, P.E., FDEP Tampa
Hamilton Oven, P.E., FDEP Tallahassee

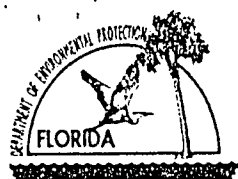
US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to <u>Doug Bramlett</u>	
Street & Number <u>Pasco County Utilities</u>	
Post Office, State, & ZIP Code <u>1530 Little Road</u>	
Postage <u>PL, FL</u>	\$ <u>34.65</u>
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <u>1-20-98</u>	

PS Form 3800, April 1995

P 520 310 302



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOLID WASTE MANAGEMENT FACILITY INSPECTION CHECKLIST

GMS I.D. No. _____ Inspection Date: 1/8/98
Facility Name: W. PASCO LANDFILL Permit No. _____ Expiration Date: _____
Address (location by section, township and range): HAYS ROAD
City: _____ State: _____ Zip: _____
Permittee or Operating Authority: PASCO COUNTY (VINCE MANNELLA)
Telephone Number (Permittee or Operating Authority): (813) 856 0119
Inspection Participants - Include ALL Landfill and Department Employees Specifying Titles (Indicate Principal Inspector):
KENN FORD, BOB BUTERA

TYPE OF FACILITY:

Landfill
☒ Class I A1, A-2, SW-1
☐ Class II
☐ Class III
Other
☐ Composting
☐ Shredder
☐ Incinerator/Trench Burner
☐ Resource Recovery
☐ Energy ☐ Materials
☐ C&D Facility
☐ Transfer Station
☐ Unauthorized Disposal

TYPE OF INSPECTION:

☐ Construction Completion (☐ phase)
☒ Operation
☐ Closure
☐ Post-Closure
☐ Reinspection
☐ Complaint Response
☐ Facility File Review
☐ Other

REQUIREMENTS

THE REQUIREMENTS LISTED ON THIS INSPECTION REPORT ARE BASED UPON RULES OF THE FLORIDA ADMINISTRATIVE CODE. A "NO" RESPONSE TO A REQUIREMENT (UNLESS OTHERWISE NOTED) REFLECTS A DEFICIENCY OR POSSIBLE VIOLATION OF THE CORRESPONDING DEPARTMENT RULE(S). EACH DEFICIENCY OR POSSIBLE VIOLATION IS DISCUSSED IN THE NARRATIVE SECTION OF THIS REPORT.

I CONSTRUCTION VERIFICATION	YES	NO	Unk	N/A
1. Subgrade or foundation prepared according to approved plan? 62-701.400(3)(a)2				
2. Liner construction/installation according to approved plan? 62-701.400(3)				
3. Leachate control system installation according to approved plan? 62-701.400(4)				
4. Disposal units constructed at planned intervals? 62-701.400(2)				
5. Gas control system installation according to approved plan? 62-701.400(10)(a)				
6. Surface water management system constructed according to approved plan? 62-701.400(9)				
7. Ground water monitoring system constructed according to approved plan? 62-701.510(2)				
8. Leachate storage constructed according to approved plan? 62-701.400(6)				
9. Liner quality assurance plan followed? 62-701.400(7)				
II OPERATIONS				
10. Trained operator on site at Class I and III during operation? 62-701.500(1)	✓			
11. Approved operating plan, complete operating records and all permit support documents available? 62-701.500(2)&(3)&(4)&(13)		✓		
12. Gas monitoring according to permit? 62-701.400(10)(c) and 62-701.500(9)				✓
13. Gas controlled to minimize off site odors? 62-701.400(10)(a)				✓
14. At least one spotter at each working face during operation at Class I and III? 62-701.500(1)			✓	
15. Load checking program implemented? 62-701.500(6)			✓	
16. Waste compaction as required? 62-701.500(7)(a)			✓	
17. In compliance with all permit specific conditions? 62-701.320(1)		✓		
18. Working face/grade above ground no greater than 3 to 1 rise? 62-701.500(7)(c)			✓	
19. Narrow working face practiced? 62-701.500(7)(d)		✓		
20. Only permitted waste types disposed of? 62-701.340(3) and 62-701.500(2)(c)&(6)(a)	✓			
21. In compliance with prohibition on unauthorized scavenging? 62-701.500(7)(h)	✓			
22. Required signs for operational directions and public information? 62-701.500(11)(h)	✓			
23. Weighing or measuring of incoming waste? 62-701.500(4)(a)&(2)(d)	✓			
24. Method and sequence of filling waste according to approved plan? 62-701.500(2)(f)		✓		
25. Sufficient operating equipment? 62-701.500(11)(a)			✓	
26. Sufficient reserve operating equipment (or other arrangements)? 62-701.500(11)(b)			✓	
27. Adequate communication facilities? 62-701.500(11)(c)	✓			
28. Solid waste being burned in accordance with Department rules? 62-701.300(3)	✓			
29. Proper control or disposal of asbestos and other special wastes? 62-701.520(4)			✓	

	YES	NO	Unk	N/A
II OPERATIONS (Continued)				
30. In compliance with prohibition on lead acid battery disposal? 62-701.300(8)(a)	✓			
31. In compliance with prohibition on used oil disposal? 62-701.300(8)(b)	✓			
32. In compliance with prohibition on yard trash disposal in lined landfills? 62-701.300(8)(c)	✓			
33. In compliance with prohibition on white goods disposal? 62-701.300(8)(d)	✓			
34. In compliance with prohibition on whole tire disposal? 62-701.300(8)(e)	✓			
III MAINTENANCE				
35. Effective barrier to prevent unauthorized entry and dumping? 62-701.500(5)	✓			
36. Adequate vector control using approved methods? 62-701.500(7)(e)	✓			
37. Disposal area easily accessible? 62-701.500(12)			✓	
38. Retention and/or detention ponds, ditches, culverts and berms maintained? 62-701.500(10)		✓		
39. Adequate dust control using approved methods? 62-701.500(11)(e)	✓			
40. Litter control maintained? 62-701.500(7)(i) & (11)(g)	✓			
41. Fire protection and fire fighting facilities adequate and operational? 62-701.500(11)(f)			✓	
42. Ground water wells intact and functioning properly? 62-701.510(2)(b) and 62-701.620(7)			✓	
43. Gas vents intact and functioning properly? 62-701.500(9)				✓
44. Leachate control, collection and treatment as required? 62-701.500(8)		✓		
IV WATER MANAGEMENT AND MONITORING				
45. Water quality sampling and testing according to standard procedures and at required frequency? 62-701.510(2)			✓	
46. Mixing of leachate and storm water prevented? 62-701.400(9)(d)		✓		
47. Storm water run-on/runoff controlled, collected and treated as required? 62-701.400(9) and 62-701.500(10)		✓		
48. Leachate sampling and testing as required? 62-701.500(8)			✓	
V COVER				
49. Adequate quantity of acceptable cover material available as stated in permit application? 62-701.330(4)(e)4	✓			
50. Frequency, amount and quality of initial cover as required? 62-701.500(7)(e)	✓			
51. Frequency, amount and quality of intermediate cover as required? 62-701.500(7)(f)	✓			
52. Adequate erosion control? 62-701.500(7)(j)		✓		
VI CLOSURE				
53. Final cover installation according to approved closure design plan? 62-701.600(5)(f)(2)				
54. Facility meets closure requirements prohibiting unauthorized dumping? 62-701.600(5)(i)				
55. All actions for closure completed according to approved closure operation plan? 62-701.600(6)				
56. Final survey, site plan and "Declaration to the Public" filed at county clerks office and certified copy filed with the Department? 62-701.610(2)				
57. In compliance with approved use of closed landfill and integrity of environmental protection is maintained? 62-701.610(7)				
58. Long term care performed according to approved closure plan? 62-701.620				
59. In compliance with all financial assurance requirements? 62-701.630				
VII NON-LANDFILL SITES				
60. Materials recovery facility operation in compliance with all permit conditions and other applicable requirements? 62-701.700				✓
61. Transfer station operation in compliance with all general permit conditions and other applicable requirements? 62-701.801				✓
62. Resource recovery facility in compliance with all permit conditions and other applicable requirements? 62-701.320(1)			✓	
63. Milling facility in compliance with all permit conditions and other applicable requirements? 62-701.320(1)				✓
64. Only authorized wastes disposed of at C&D facility? 62-701.730(6)				✓
65. C&D facility in compliance with all permit conditions and other applicable requirements? 62-701.730 and 62-701.803				✓

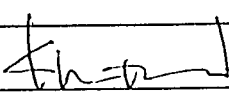
Department copy (white)

Facility copy (yellow)

VIII NARRATIVE

Explanation for all "no" responses and other comments (continue on separate sheet if necessary)

- #11. — OPERATIONS PLAN NOT REVISED AS PREVIOUSLY REQUESTED AND NOT RESUBMITTED FOR APPROVAL BY FDEP. CURRENT OPERATIONS PLAN CONTAINS MANY ITEMS THAT HAVE CHANGED
- #17. — NOT IN COMPLIANCE WITH CONDITION #20 FILLING SEQUENCE HAS CHANGED, #24 FILLING METHOD CHANGED, #25 WORKING FACE NOT MINIMIZED, #27 LEACHATE NOT MANAGED AS DESCRIBED IN OPERATIONS PLAN
- #18. — NOT A WORKING FACE AS DESCRIBED IN OPERATIONS PLAN
- #24. — NOT FILLED AS SHOWN IN OPERATIONS DRAWINGS
- #38. — WASHOUT/DEPRESSION AT END OF CULVERT IN RETENTION POND NEAR DISPOSAL UNIT A-1
- #44. — INADEQUATE REMOVAL OF LEACHATE FROM A-2, AND POSSIBLY SW-1 WHICH ALSO HAD PONDING WATER. LEACHATE REMOVAL REPORT FOR DECEMBER NOT PROVIDED TO SHOW RECEIVING TREATMENT FACILITIES AS PREVIOUSLY REQUESTED. LEACHATE REMOVAL RECORDS NOT PROVIDED FOR JANUARY 1-7 BY FRIDAY JANUARY 9. ~~AS REQUESTED~~
- #46. — LEACHATE HOSE LEAKING IN RETENTION POND
- #47. — STORMWATER POND ON TOP OF DISPOSAL UNIT A-1 NOT APPROVED BY FDEP
- #52. — SEVERAL WASHOUTS BEING REPAIRED ON UNIT A-1. THE MOST SEVERE WASHOUT APPARENTLY CAUSED BY BERM ON TOP OF A-1 NOT APPROVED BY FDEP.

Signed:  1/12/98 Received: _____ / _____
 DEP Representative Date Site Representative Date

C:\WINDOWS\DESKTOP\REP\Report\Leachate Data\Leachate - NOV97.xls
 PASCO COUNTY: UTILITIES SERVICES BRANCH
 LEACHATE REPORT
 FISCAL YEAR END 9/30/98

MONTH & DAY	MEASURED RAINFALL	WEST PASCO CLASS I LEACHATE REMOVED						TOTAL LEACHATE REMOVED	ON-SITE LEACHATE			TOTAL LEACHATE DISPOSAL	BALANCE
		ASH CELL I	WOOD LAND	ASH CELL II	WOOD LAND	SOLID WASTE CELL I	WOOD LAND		SHADY HILLS WWTP	OTHER OFF-SITE WWTP	MANAGEMENT PLANT		
01-Nov-97	3,500	0	0	25,800	3,900	254,510	0	284,210	254,510	8,000	0	260,510	
02-Nov-97	0,000	0	0	20,800	4,000	0	0	24,800	0	0	0	0	
03-Nov-97	0,000	0	0	13,500	3,300	228,650	0	243,450	228,650	8,000	0	232,650	
04-Nov-97	0,000	0	0	0	3,300	32,790	0	36,090	32,790	0	0	32,790	
05-Nov-97	0,000	0	0	0	2,700	22,250	0	24,950	22,250	0	0	22,250	
06-Nov-97	0,000	0	0	8,000	3,500	18,490	0	25,990	18,490	0	0	18,490	
07-Nov-97	0,000	0	0	0	2,500	13,910	0	16,510	13,910	0	0	13,910	
08-Nov-97	0,000	0	0	0	2,600	11,630	0	14,230	11,630	0	0	11,630	
09-Nov-97	0,000	0	0	0	2,600	0	0	2,600	0	0	0	0	
10-Nov-97	0,000	0	0	0	2,500	9,300	0	11,800	9,300	0	0	9,300	
11-Nov-97	0,000	0	0	0	2,300	0	0	2,300	0	0	0	0	
12-Nov-97	0,000	0	0	0	2,600	10,280	0	12,880	10,280	0	0	10,280	
13-Nov-97	0,000	0	1,568	0	2,200	3,420	3,773	10,961	7,183	0	0	7,183	
14-Nov-97	2,000	0	0	0	2,500	55,540	0	58,340	55,540	0	0	55,540	
15-Nov-97	0,000	0	0	0	1,900	49,840	0	51,740	49,840	0	0	49,840	
16-Nov-97	0,000	0	0	0	2,000	0	0	2,000	0	8,000	0	8,000	
17-Nov-97	0,000	0	0	0	2,200	42,560	0	44,760	42,560	0	0	42,560	
18-Nov-97	0,000	0	0	0	2,100	7,920	0	10,020	7,920	0	0	7,920	
19-Nov-97	0,000	0	0	0	1,900	9,430	0	11,030	9,430	0	0	9,430	
20-Nov-97	0,000	0	0	0	2,000	6,920	0	8,920	8,920	0	0	8,920	
21-Nov-97	0,000	0	0	0	1,500	6,910	0	8,410	6,910	0	0	8,910	
22-Nov-97	0,000	0	0	0	1,400	3,440	0	4,840	3,440	0	0	3,440	
23-Nov-97	0,000	0	0	0	0	0	0	0	0	0	0	0	
24-Nov-97	0,000	0	0	0	3,500	11,320	0	14,820	11,320	0	0	11,320	
25-Nov-97	0,000	0	0	0	1,800	0	0	1,800	0	0	0	0	
26-Nov-97	0,000	0	0	0	1,100	2,350	0	3,450	2,350	0	0	2,350	
27-Nov-97	0,000	0	0	0	1,800	0	0	1,800	0	0	0	0	
28-Nov-97	0,000	0	0	0	1,500	0	0	1,500	0	0	0	0	
29-Nov-97	0,000	0	0	0	1,400	3,420	0	4,820	3,420	0	0	3,420	
30-Nov-97	0,000	0	0	0	1,500	0	0	1,500	0	0	0	0	
Nov-97	5,500	0	1,568	98,100	68,000	600,900	3,773	940,341	804,673	18,000	0	822,373	117,568

STAFF
 GAUGE
 IN
 A-2

GALLONS
 STORED
 IN
 A-2

- ** West Pasco Class I Landfill has a total of 30 acres, which are comprised of three cells. The cells consist of the following:
 • Ash Cell I - 10 acres INTERMEDIATE COVER
 • Ash Cell II - 10 acres OPEN
 • Solid Waste Cell I - 10 acres OPEN

PASCO COUNTY: UTILITIES SERVICES BRANCH
LEACHATE REPORT
CALENDAR YEAR END 12/31/97

MONTH & DAY	MEASURED RAINFALL	REMOVED						TOTAL LEACHATE REMOVED	SHADY HILLS WWTP	OTHER OFF-SITE WWTP	ON-SITE LEACHATE MANAGEMENT PLANT	TOTAL LEACHATE DISPOSAL	BALANCE
		ASH CELL I	A-1 SECOND LAYER	ASH CELL II	A-2 SECOND LAYER	SOLID WASTE CELL	SW-1 SECOND LAYER						
Jan-97	2.100	159,979	1,911	1,200	0	142,361	5,929	311,380	311,380	0	0	311,380	0
Feb-97	1.600	138,907	2,548	82,100	1,200	158,697	1,176	382,623	382,628	0	0	382,628	0
Mar-97	2.650	86,735	1,225	60,168	0	205,209	2,401	355,738	355,738	0	0	355,738	0
Apr-97	7.300	170	1,715	1,882,100	100	282,330	3,724	1,950,139	975,149	0	974,990	1,950,139	0
May-97	0.800	374,493	1,127	292,800	15,000	433,890	3,430	1,120,740	998,420	0	122,320	1,120,740	0
Jun-97	6.500	82,350	2,744	321,000	24,800	787,078	8,762	1,224,734	1,025,164	0	199,570	1,224,734	0
Jul-97	11.850	137,945	1,323	1,371,800	46,700	2,493,884	3,871	4,055,523	3,758,505	0	297,018	4,055,523	0
Aug-97	7.850	204,289	833	330,300	0	1,788,445	3,875	2,325,542	1,790,120	0	305,655	2,095,775	229,787
Sep-97	8.300	40	1,813	0	55,777	957,830	4,067	1,019,527	661,897	96,000	401,580	1,459,477	(210,183)
Oct-97	6.700	10	2,646	0	121,700	734,530	10,143	869,029	744,873	72,800	432,290	1,249,563	(590,717)
Nov-97	5.800	0	1,568	66,100	68,000	800,900	3,773	940,341	804,873	18,000	0	822,873	(473,049)
Dec-97	0.000	0	0	0	0	0	0	0	0	0	0	0	(473,049)
1997	61.550	1,182,918	19,453	4,187,568	333,277	8,783,154	48,951	14,555,321	12,108,347	166,800	2,733,423	15,028,370	(473,049)

** West Pasco Class I Landfill has a total of 30 acres, which are comprised of three cells. The cells consist of the following:
- Ash Cell I - 10 acres INTERMEDIATE COVER
- Ash Cell II - 10 acres OPEN
- Solid Waste Cell I - 10 acres OPEN

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12-31-1997 4:17PM

FROM ENVIRONMENTAL 813 847 8064

P. 4

PASCO COUNTY: UTILITIES SERVICES BRANCH
 LEACHATE REPORT
 FISCAL YEAR END 9/30/98

31-Dec-97

WEST PASCO

MONTH & DAY	ASH CELL I	SECOND LINER	ASH CELL II	SECOND LINER	MEASURED RAINFALL	NOTES
14-Dec-97	0	0	0	1,900	0.000	
15-Dec-97	0	0	12,000	2,100	2.500	
16-Dec-97	113,000	0	12,000	1,400	0.000	
17-Dec-97	107,100	0	12,000	1,400	0.000	
18-Dec-97	105,300	0	12,000	1,800	0.000	
19-Dec-97	97,700	0	24,000	1,300	0.000	
20-Dec-97	90,500	0	12,000	1,400	0.000	
21-Dec-97	116,800	0	16,000	1,900	0.000	
22-Dec-97	104,300	1,029	24,000	1,700	0.000	
23-Dec-97	0	0	12,000	1,600	0.000	
24-Dec-97	0	0	12,000	1,800	0.000	
25-Dec-97	0	0	0	1,400	2.700	
26-Dec-97	0	0	12,000	2,000	0.000	
27-Dec-97	8,100	0	6,000	1,600	3.700	
28-Dec-97	78,900	0	12,000	1,800	0.000	
29-Dec-97	18,000	0	12,000	1,500	0.100	
30-Dec-97	23,000	0	12,000	2,200	0.300	
31-Dec-97	0	0	12,000	1,100	0.000	

Transmit Confirmation Report

No. : 009
Receiver : OGC-ENFORCEM
Transmitter : WASTE MGT TAMPA SWDIST
Date : Feb 04 98 13:34
Time : 10'39
Mode : Norm
Pages : 21
Result : OK

Transmit Confirmation Report

No. : 013
Receiver : SOLID-WST-TA
Transmitter : WASTE MGT TAMPA SWDIST
Date : Feb 04 98 15:57
Time : 11'29
Mode : Norm
Pages : 21
Result : OK

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Correspondence Control

Correspond Number	Date Received	Date Written	Subject Reference	Date Due
-------------------	---------------	--------------	-------------------	----------

SW-00276	02/02/98	02/02/98	Pasco Co. Resource Recovery Fa	02/20/98
----------	----------	----------	--------------------------------	----------

Name: Douglas S. Bramlett
Affiliated Organization: Pasco Co. - Utilities Service Branch
Address: 7530 Little Road

City/State/Zip: New Port Richey, FL 34654
Phone: 813-847-8145

AffiliationType: Other
Secretary's Ref:
Assigned to: Waste Management
County: Pasco
Category: Solid Waste
Rules:

INSTRUCTIONS: Prepare Response for Director

COMMENTS: Assigned to Bill Kutash.

RESPONDED ON: / /



PASCO CC

Post-It® Fax Note 7671		Date 2/2	# of pages 3
To R. Garrity	From Doug Bramlett		
Co./Dept FDEP	Co. PCV SB		
Phone # 813-744-6100	Phone # 813-847-8145		
Fax # 813-744-6084	Fax # 847-8064		

DADE CITY (352) 521-4274
 LAND O' LAKES (813) 996-7341
 NEW PORT RICHEY (813) 847-8145
 FAX (813) 847-8064

UTILITIES SERVICES BRANCH
 PUB. WKS./UTILITIES BLDG., S-213
 7530 LITTLE ROAD
 NEW PORT RICHEY, FL 34654

February 2, 1998

Mr. Richard D. Garrity, Ph.D.
 Director of District Management
 Florida Department of
 Environmental Protection
 3804 Coconut Palm Drive
 Tampa, FL 33610-8318

M3
 A-1 To
 B-11 K
 /
 FG

RE: Certified Letter of January 20, 1998

Dear Dr. Garrity:

I regret the late response to our letter referenced above, but an unusual event at the Pasco County Resource Recovery Facility, the result of which took some major time to resolve, temporarily delayed my response.

Item No. 1: Pasco County is forwarding copies of all leachate quantities, on a daily basis, via Fax to the Florida Department of Environmental Protection (FDEP).

Item No. 2: Changes to the manholes and valves in engineering drawings have been sent to the FDEP by Law Engineering and Environmental Services. Pasco County has, at the FDEP's request, installed a staff gauge and is reporting daily readings to the FDEP. Pasco County cannot determine leachate volume based on staff gauge readings. The irregular periphery and bottom of the cell makes volume calculation impossible. However, it is computed that Cells A-1 plus A-2 contained approximately 23,000,000 gallons of leachate. Rainfall since December 11, 1997 through December 31, 1997 totaled 14.0 inches; for January 1998 a total of 10.7 inches was recorded. The recorded rainfall of 24.7 inches will yield an additional volume of 7,982,806 gallons, or a total of 30.98 million gallons, including the 2 million in Crom Tank.

Mr. Richard D. Garrity, Ph.D.
February 2, 1998

Item No. 3: The plans and specifications for covering Cell A-1 are out for bid, with bids to be received on February 5, 1998. The bid award and construction will be implemented with all dispatch. The covering of Cell A-2 is under discussion with Law Engineering and Environmental Services and Pasco County. The covering of Unit A-2 will be placed on high priority for completion as soon as possible. The covering is, of course, subject to:

- A) uncovered areas required for roadways for ash placement in the cells, and
- B) the area under leachate cannot be covered until such time as the leachate in Cell A-2 permits exposure of the cells surface.

Pasco County has a serious concern with the cells over topping (A-1 and A-2) and we are monitoring the freeboard on both cells. Be advised that the freeboard on Cell A-1 is 3'7", the freeboard on Cell A-2 is 2'25". The covering of Cell A-1 will be placed on an emergency basis which will eliminate 50% of all future leachate generated; the covering of Cell A-2 will be resolved as soon as practical application can be implemented, as noted above in Conditions A and B.

Item No. 4: Yard trash is presently being mulched and spread on haul roads. This procedure will continue until all stocked mulch is spread or hauled to Pasco County parks.

Item No. 5: Matters covered in this item are correct as noted, however, Tampa personnel, the Waste Industrial Water Manager, advised Pasco County that the FDEP Domestic Waste Section directed them (Tampa Wastewater Treatment Plant) to limit the leachate they could accept to 12,000 gallons per day to determine the Tampa WWTP's discharge limits would not be exceeded; then gradually permitting an increase in the volume accepted assuring the discharge limits would not be exceeded, then the volume could increase. This plan is working well, Pasco County presently transports 60,000 gallons per day, seven days per week. Pasco County was noticed on Thursday, January 29, 1998, that New Port Richey could no longer accept ash leachate for co-treatment. We are working with the City to start deliveries of limited loads (1-2 per day) as soon as possible. Future plans have been covered in the Revised Operations Plans, submitted by Law Engineering to the FDEP for review. Future "leachate generated rates in response to anticipated rainfall" are under study and will be forwarded to the FDEP when completed.

The following comments are in response to the "Solid Waste Management Facility Checklist" which was attached in your letter.

Number 11: Operations revised, plan has been submitted.

Mr. Richard D. Garrity, Ph.D.
February 2, 1998

Number 17: This item has been covered in Revised Operations Plan.

Number 18: Please refer to Items 11 and 17 above.

Number 21: Please refer to Items 11, 17, and 18 above.

Number 24: Please refer to Items 11, 17, 18, and 21 above.

Number 38: The wash-out at the culvert have been repaired.

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Number 46: Leaking leachate hose repaired.

Number 47: Storm water ponded on Unit A-1, Pasco County constructed a small berm to slow run-off on east slope of unit preventing massive erosion problems from reoccurring.

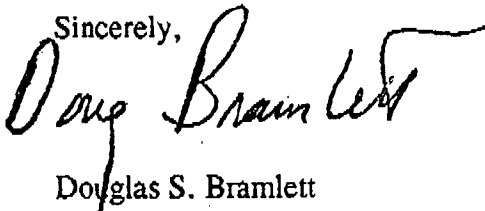
Number 52: All washouts have been repaired.

I appreciate your understanding to bring Pasco County's site into full compliance as soon as possible. Please permit me to assure you we are making every effort to do so within County operating procedures with the Board of County Commissioners's cooperation and approval. I do not believe site conditions are going contrary to this goal. The County's progress is moving as rapidly as permitted and we have aggressively transported more than 1,000,000 gallons of leachate to the two WWTPs that permit us to do so. Further, the designers and constructors of the County's Leachate Management Facility are on-site making major modifications to the plant and start-up is in the immediate near future.

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February 2, 1998

I trust all matters contained in your letter have been addressed. It is my belief and understanding that we both, the FDEP and Pasco County, are working diligently toward a final solution to this problem. We again request permission to pump (trickle feed) approximately 30,000 gpd of ash leachate to the Shady Hills WWTP under our current Consent Agreement.

Sincerely,



Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv/18/garrity

cc: Robert J. Butera, P.E. III, Division of Waste Management, FDEP, Tampa, FL
Kim B. Ford, P.E. I, Division of Waste Management, FDEP, Tampa, FL
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager
Ronald Walker, Solid Waste Superintendent



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
 LAND O' LAKES (813) 996-7341
 NEW PORT RICHEY (813) 847-8145
 FAX (813) 847-8064

UTILITIES SERVICES BRANCH
 PUB. WKS./UTILITIES BLDG., S-213
 7530 LITTLE ROAD
 NEW PORT RICHEY, FL 34654

February 2, 1998

Mr. Richard D. Garrity, Ph.D.
 Director of District Management
 Florida Department of
 Environmental Protection
 3804 Coconut Palm Drive
 Tampa, FL 33610-8318

Post-it Fax Note 7671		Date 2/3	# of pages 4
To R. Butera	From D. Bramlett		
Co./Dept. FDEP	Co. PC USB		
Phone # 744-6100	Phone # 847-8145		
Fax # 744-6084	Fax # 847-8064		

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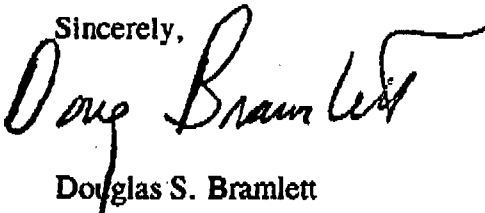
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Sincerely,



Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv/18/garrity

cc: Robert J. Butera, P.E. III, Division of Waste Management, FDEP, Tampa, FL
Kim B. Ford, P.E. I, Division of Waste Management, FDEP, Tampa, FL
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager
Ronald Walker, Solid Waste Superintendent

dead at the scene.

Tampa Tribune 1/26/98
**Fire burning
at incinerator**

SHADY HILLS — Fire at an incinerator may sound like business as usual. But a fire reported at the Shady Hills trash incinerator, known officially as the waste-to-energy facility, on Saturday night was out of the ordinary.

A fire broke out on the tipping floor, where garbage trucks dump their loads, a large crane scoops it up and puts it in the incinerator.

The tipping-floor fire, which was still burning but under control Sunday afternoon, was reported around 8:30 p.m. Saturday, according to a prepared statement from Michele Baker, Pasco's disaster-preparedness coordinator.

No one was injured in the fire and The incinerator continued operating.



LAW

ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

RECEIVED

JAN 30 1998

DEP

January 30, 1998

Mr. Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Subject: **West Pasco Landfill**
Disposal Units A-1 and A-2
Number PA87-23, Pasco County
LAW Project 40141-7-0291.02

Dear Mr. Ford:

Law Engineering and Environmental Services, Inc. (LAW), on behalf of Pasco County, has prepared the enclosed Addendum to the Operations Plan for Disposal Units A-1 and A-2. The design changes for A-1 and A-2 are described in the Background section of the Plan. We have used the Operations Plan in the permit for A-2 and listed all the sections then provided the revisions as needed.

If you have any questions concerning this Addendum, please contact Richard Mayer or George Ellsworth at 813/289-0750.

Sincerely,

LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

George W. Ellsworth, P.G.
Senior Environmental Geologist
Florida Registration 0848

Richard E. Mayer, P.E. 1/30/98
Principal Engineer
Florida Registration 41759

REM/GWE/cjs/ENVIRO/REPORT/4014170291.ADD-L1

cc: Vincent Mannella
Douglas Bramlett

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 1/30/98

Subject GATX - storage of leachate

Time _____

Permit No. _____

County Hills

M Alec

Telephone No. 241-1139

Representing GATX

☒ Phoned Me ☐ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting _____

Wants to store W. Pasco leachate for
3 months. Temp permit?

Bob & Jim Discussed Tank Use
Apparently for BARGE SCENARIO
WE ASKED FOR COST TO STORE FOR MONTH, QUARTER, YEAR
FOR 10,000,000 GALLONS
ALEC SAID HE WILL DISCUSS WITH SHAWN RUIGHE 2/11/98

(continue on another
sheet, if necessary)

Signature [Signature]

Title _____

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Correspondence Control

Correspond Number	Date Received	Date Written	Subject Reference	Date Due
----------------------	------------------	-----------------	-------------------	----------

SW-00265 01/29/98 01/23/98 Gulf disposal 02/09/98

Name: Andrew Vogt
Affiliated Organization: Solid Wste Mgt Cit Adv Council
Address: P.O. Box 384

City/State/Zip: Port Richey, FL 34673
Phone: 813-842-2424

AffiliationType: Other
Secretary's Ref: EO-00715
Assigned to: Waste Management
County: Pasco
Category: Environmental Impacts
Rules:

INSTRUCTIONS: Prepare Response for VW
Prepare in final form, a reply for the signature of Virginia Wetherell.

COMMENTS: Assigned to Bill Kutash.

RESPONDED ON: / /

facsimile
TRANSMITTAL

to: Sandra Lynch / Southwest District Office
fax #: 542-6084
re: Correspondence Control
date:
pages: 5, including this cover sheet.

From the desk of...

Tocoi Arthur
Administrative Assistant II
Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399

291-1222
Fax: 277-3267

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Office of the Secretary Correspondence Control

Correspond Number	Date Received	Date Written	Subject Reference	Date Due
EO-00715	01/27/98	01/23/98	gulf disposal	02/10/98
Name: Andrew Vogt Affiliated Organization: Solid Waste Mgt Cit Adv Council Address: P.O. Box 384 City/State/Zip: Port Richey, FL 34673 Phone: 813-842-2424			AffiliationType: Other Governor's Ref: SW DIST Assigned to: Waste Management County: Pasco Category: Environmental Impacts Rules:	
INSTRUCTIONS: Prepare Response for VW. Prepare in final form, a reply for the signature of Virginia Wetherell. Return to Jack Pons.				
COMMENTS: policy issue? <i>[Signature]</i>				
Assigned by Jack Pons, Office of the Secretary			Phone: 487-0940 SC: 277-0940	

RECEIVED
 JAN 27 1998
 DIVISION OF
 WASTE MANAGEMENT

SOLID WASTE MANAGEMENT CITIZENS ADVISORY COMMITTEE

Andrew C. Vogt
P.O. 384
Port Richey
Florida 34673
(813) 842-2424
Jan. 23 1998

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

JAN 27 1998

OFFICE OF THE SECRETARY

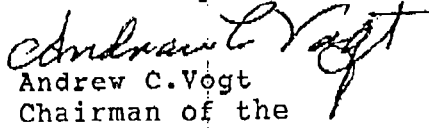
Ms. Virginia Wetherell
Secretary, F.I.D.E.P.
3900 Commonwealth Blvd.
Tallahassee
Fl. 32399

Dear Ms. Wetherell;

As an appointed citizens advisory committee to the Pasco County Board of Commissioners we are interested in the feasibility of gulf disposal of our dehydrated end product of our Leachate Recovery Facility which is located in Shady Hills, Pasco County, Florida. The material is non-toxic as shown in the enclosed two page analysis. We wish to make this recommendation in deference to our current land fill procedure because of limited space;

To this end we are inquiring as to the appropriateness of such an action. If this matter does not fall within the purview of Florida D.E.P. we would appreciate a response so stating. However if this matter is within the purview of Florida D.E.P. we would appreciate the reference source and any additional information you would care to share with us.

Yours truly



Andrew C. Vogt
Chairman of the
Solid Waste Management
Citizens Advisory Committee.

cc; Douglas Bramlett
Assistant County Administrator
(Utilities Services)



PASCO COUNTY, FLORIDA

ENVIRONMENTAL LABORATORY
8864 GOVERNMENT DRIVE
NEW PORT RICHEY, FL 34654
(813) 847-8902

REPORT OF ANALYSES

RESOURCE RECOVERY
14230 HAYS ROAD
SPRING HILL, FL 34610-
Attn: VINCENT MANNELLA

PROJECT NAME: RES REC LEACHAT
DATE: 01/08/98
DHRS # 44237, E44123

SAMPLE NUMBER- 63256 SAMPLE ID- PRIMARY LEACHATE
DATE SAMPLED- 12/24/97 LOCATION-
DATE RECEIVED- 12/24/97 SAMPLER- JAMES HOFFMAN
TIME RECEIVED- 1055 DELIVERED BY- JIM HOFFMAN

SAMPLE MATRIX- LE
TIME SAMPLED- 0900
RECEIVED BY- AS

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP DATE	ANALYSIS BY DATE	TIME	BY	RESULT	UNITS
CHLORIDE	EPA 325.2			01/05/98 1100	JK	20558	mg/L
BIOCHEM.OXY.DEMAND	SM5210B			12/24/97 1300	CEM	436	mg/L
KJELDAHL NITROGEN	4500NorgB			12/24/97 1500	TER	10.2	mg/L
PH,LAB	EPA150.1			12/24/97 1145	JK	7.52	std units
TOTAL SUSP. SOLIDS	EPA160.2			12/24/97 1300	CEM	34	mg/L
ARSENIC, TOTAL	206.2	01/05/98	TER 01/07/98	1240	TER	<0.01	mg/L
CADMIUM, TOTAL	213.2	01/05/98	TER 01/07/98	1400	TER	0.15	mg/L
CHROMIUM, TOTAL	218.2	01/05/98	TER 01/07/98	1040	TER	<0.01	mg/L
COPPER, TOTAL	220.2	01/05/98	TER 01/07/98	0910	TER	0.28	mg/L
LEAD, TOTAL	239.2	01/05/98	TER 01/07/98	1115	TER	<0.01	mg/L
NICKEL, TOTAL	249.2	01/05/98	TER 01/07/98	0935	TER	1.19	mg/L
SELENIUM, TOTAL	270.2	01/05/98	TER 01/07/98	1330	TER	<0.01	mg/L
SILVER, TOTAL	272.2	01/05/98	TER 01/07/98	1415	TER	0.31	mg/L
ZINC, TOTAL	289.1	01/05/98	TER 01/07/98	0920	TER	0.15	mg/L

LABORATORY DIRECTOR



PASCO COUNTY, FLORIDA

ENVIRONMENTAL LABORATORY
8864 GOVERNMENT DRIVE
NEW PORT RICHEY, FL 34654
(813) 847-8902

REPORT OF ANALYSES

RESOURCE RECOVERY
14230 HAYS ROAD
SPRING HILL, FL 34610-
Attn: VINCENT MANNELLA

PROJECT NAME: DEMIN/LEACHATE
DATE: 01/08/98
DHRS #: 44237, E44123

SAMPLE NUMBER- 63254 SAMPLE ID- A-1 PRIMARY LEACHATE
DATE SAMPLED- 12/24/97 LOCATION- NOT SPECIFIED
DATE RECEIVED- 12/24/97 SAMPLER- WALTER DRADRANSKY
TIME RECEIVED- 1040 DELIVERED BY- W DRADRANSKY

SAMPLE MATRIX- LE
TIME SAMPLED- 0900
RECEIVED BY- AS

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP		ANALYSIS		RESULT	UNITS
		DATE	BY	DATE	TIME BY		
CHLORIDE	EPA 325.2			01/05/98	1100 JK	45733	mg/L
NITRATE	EPA 353.2			12/30/97	1600 IF	<0.11	mg/L
TOTAL DISS.SOLIDS	EPA160.1			12/24/97	1400 JK	100000	mg/L
SPEC.CONDUCTIVITY	EPA120.1			12/24/97	1045 JK	103200	umhos
SODIUM,TOTAL	273.1	01/05/98	TER	01/05/98	1100 TER	11200	mg/L

LABORATORY DIRECTOR



PASCO COUNTY, FLORIDA

VINCENT MANNELLA, P.E.
SOLID WASTE/RESOURCE RECOVERY MANAGER

14230 HAYS ROAD
SPRING HILL, FL.
34610

PHONE: (813) 856-0119

FAX: (813) 856-0007

DATE: JAN 26 1998

TO: MR KIM FORD DE

COMPANY: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

TELECOPIER TEL NO: 813-744-6084

FROM: Vince Mannello

CLIENT/MATTER NO: PASCO COUNTY GOVERNMENT, SOLID WASTE DIVISION

TOTAL NO. OF PAGES TRANSMITTED (INCLUDING COVER LETTER): 1

MESSAGE: RRP FIRE ON JAN 24 & 25 HAS CAUSED THE

NEED TO BY PASS ALL INCOMING MSW TO
DISPOSAL UNIT SW-1. WE ANTICIPATE BY PASSING
ALL MSW FOR A PERIOD OF ABOUT 5 DAYS.

TRANSFER TRUCKS WILL BE SENT TO THE RRP ON OR
ABOUT JAN. 29/30. TOWN TRUCKS WILL BE SENT
TO THE RRP ON OR SOONER THAN FEB. 4 1998. THE
IS AMPLE COVER IN SW-1. IF YOU NEED MORE
INFORMATION PLEASE CALL ME DIRECT @ 813-856-0119.
PLEASE COPY MR. BUTERA ON THIS FAX

VLM

DATE: 1/26/98

TIME: 9:25

PLEASE CALL BACK AS SOON AS POSSIBLE
IF YOU DO NOT RECEIVE ALL OF THE PAGES INDICATED

TELECOPIER OPERATOR: [Signature]



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 20, 1998

Mr. Doug Bramlett
Pasco County Utilities
7530 Little Road
New Port Richey, FL 34654

Re: West Pasco Landfill

Dear Doug;

On January 8, 1998, Bob Butera and Kim Ford visited the West Pasco Landfill site and observed a number of new problems as well as old issues which have worsened since our last meeting. Please review the attached site inspection for January 8, 1998 and explanations listed on the third page of the inspection form. You are requested to respond with a schedule for corrective actions of non-compliance items noted during the inspection not specifically addressed below within 10 days.

In addition to the site operation problems noted on the January 8, 1998 inspection report, there are several other related activities and items which are of concern to the Department which require your attention:

1. Attached are the spreadsheets for recording leachate quantities discussed at our December 11, 1997 meeting. The Department requested that this information as indicated on the sheets be updated and provided by FAX to the Department each week on Friday for all days through the previous Wednesday. Hard copies of the completed form were to follow by mail at the end of each month. This submittal has not taken place and should be initiated.
2. During the December 11, 1997 meeting, the issue of changes to the manholes and valves for disposal unit A-1 were discussed and the Department requested record drawings for the changes to the manholes and valves for disposal unit A-1, and the estimated quantity of leachate in disposal unit A-2 updated daily based on staff gauge readings. The December 19, 1997 letter from Law Engineering officially notifies the Department of the changes, but failed to include the requested record drawing. The Department has also not received the requested staff gauge readings. These submittals should be provided to the Department. As a result of the recent inspection, an estimate of the volume of leachate impounded in SW-1 should also be included.

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

Printed on recycled paper.

3. Pasco County's Task Order 1-98 dated November 1997 instructed Law Engineering to prepare an operations plan to include filling procedures and possibly the use of a rain tarp to limit rainfall infiltration in inactive areas of Cell A-2 within 30 days. The descriptive plan for the use of a rain tarp from Law Engineering dated January 5, 1998 lacks sufficient design detail and supporting documentation to provide reasonable assurance that future rain events in 1998 can be properly controlled and leachate minimized. Immediate and detailed filling and grading plans for corrective actions and revised operations plan for compliance to prevent reoccurrence is required for Department review. Department staff believes that unless most of the entire disposal unit A-2 is covered with a rain tarp by June 1, 1998 (the beginning of the rainy season) there is a serious threat of overtopping the liner which would cause a discharge of ash leachate. The Department's Warning Notice dated November 18, 1997 and letter dated November 21, 1997 requested specific plans for corrective action. To date the County has not included methods that would reasonably assure the Department of corrective actions to prevent further violations. In addition to the design plans, supporting documents shall include future rain and leachate projections and calculations for leachate generation rates in response to anticipated rainfall. All the aforementioned submittals are required for Department review and disposition and should be provided within the next 10 days.
4. Yard trash accepted at the site shall be processed and recycled, or disposed of within twelve months. This permit condition in the current Class III landfill permit has not been complied with. The Department has no objection to the December 18, 1997 Yard Trash Management Plan and anticipates compliance within the next few months.
5. At our meeting on December 11, 1997, I believe the County committed to transporting 12,000 gpd immediately increasing to 60,000 gpd of ash leachate to the Tampa WWTP and 12,000 gpd to the New Port Richey WWTP by mid-January. To date, records indicate a maximum of only 24,000 gpd to Tampa on two days only in December since the meeting and 18,000 gpd on one day only to New Port Richey, and on most days much less or none at all. The Department requests an explanation of this shortfall in corrective action which the County committed to initiate and an indication of your ability to meet your commitments to remove and transport the ash leachate in the future.

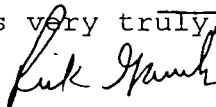
Mr. Doug Bramlett
Pasco County Utilities

January 20, 1998
Page Three

Administrative procedures such as permit modifications have not been followed for ongoing site changes. Understandably, some issues have a greater need for a quick response and Department staff have proven their ability to meet and resolve these urgent issues in a cooperative and timely manner. It is the duty of Department staff to provide technical assistance as is consistently provided for all permittees, on all issues that may impact ongoing regulated activities.

I bring these matters to your direct attention because I believe you and Mr. Gallagher's intentions are to come into full compliance as quickly as possible. However, the Department is very concerned that conditions at this site appear to be going in the opposite direction and the County's progress does not appear to be as aggressive as the situation warrants. As a result, the County may soon be faced with conditions which may take years to correct. I request that you contact Bob Butera immediately to resolve these issues and provide a specific schedule to implement all corrective actions required to bring site into compliance.

Yours very truly,



Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/kbfb
Attachments

cc: John Gallagher, Pasco County
Vince Mannella, Pasco County
Robert Butera, P.E., FDEP Tampa
Hamilton Oven, P.E., FDEP Tallahassee

P 520 310 302

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Doug Bramlett	
Street & Number	
Pasco County Utilities	
Post Office, State, & ZIP Code	
7530 Little Road	
Postage	APR, FL \$34.654
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
1-20-98	

PS Form 3800, April 1995

SENDER: WEST PASCO LANDFILL

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Doug Bramlett
Pasco County Utilities
7530 Little Road
New Port Richey, FL 34654

4a. Article Number

P 520-310 302

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☒ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

1-22-98

5. Received By: (Print Name)

Kenneth M. Neilly

6. Signature: (Addressee or Agent)

X

Kenneth M. Neilly

8. Addressee's Address (Only if requested and fee is paid)

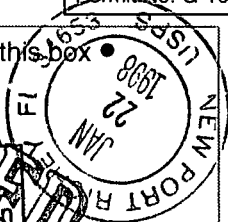
UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

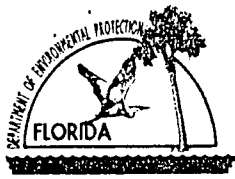
- Print your name, address, and ZIP Code in this box •

RECEIVED



State of Florida
Department of Environmental Protection
3804 Coconino Palm Drive
Tampa, Florida 33619-8318

Kim Ford - Solid Waste



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOLID WASTE MANAGEMENT FACILITY INSPECTION CHECKLIST

GMS I.D. No. _____ Inspection Date: 1/8/98
Facility Name: W. PASCO LANDFILL Permit No. _____ Expiration Date: _____
Address (location by section, township and range): HAYS ROAD
City: _____ State: _____ Zip: _____
Permittee or Operating Authority: PASCO COUNTY (JUAN MANANILLA)
Telephone Number (Permittee or Operating Authority): (813) 8560119
Inspection Participants - Include ALL Landfill and Department Employees Specifying Titles (Indicate Principal Inspector):
KENN FORD, BOB BUTERA

TYPE OF FACILITY:

Landfill
☒ Class I A-1, A-2, SW-1
☐ Class II
☐ Class III
Other
☐ Composting
☐ Shredder
☐ Incinerator/Trench Burner
☐ Resource Recovery
☐ Energy ☐ Materials
☐ C&D Facility
☐ Transfer Station
☐ Unauthorized Disposal

TYPE OF INSPECTION:

☐ Construction Completion (☐ phase)
☒ Operation
☐ Closure
☐ Post-Closure
☐ Reinspection
☐ Complaint Response
☐ Facility File Review
☐ Other

REQUIREMENTS

THE REQUIREMENTS LISTED ON THIS INSPECTION REPORT ARE BASED UPON RULES OF THE FLORIDA ADMINISTRATIVE CODE. A "NO" RESPONSE TO A REQUIREMENT (UNLESS OTHERWISE NOTED) REFLECTS A DEFICIENCY OR POSSIBLE VIOLATION OF THE CORRESPONDING DEPARTMENT RULE(S). EACH DEFICIENCY OR POSSIBLE VIOLATION IS DISCUSSED IN THE NARRATIVE SECTION OF THIS REPORT.

I CONSTRUCTION VERIFICATION	YES	NO	Unk	N/A
1. Subgrade or foundation prepared according to approved plan? 62-701.400(3)(a)2				
2. Liner construction/installation according to approved plan? 62- 701.400(3)				
3. Leachate control system installation according to approved plan? 62-701.400(4)				
4. Disposal units constructed at planned intervals? 62-701.400(2)				
5. Gas control system installation according to approved plan? 62-701.400(10)(a)				
6. Surface water management system constructed according to approved plan? 62-701.400(9)				
7. Ground water monitoring system constructed according to approved plan? 62-701.510(2)				
8. Leachate storage constructed according to approved plan? 62-701.400(6)				
9. Liner quality assurance plan followed? 62-701.400(7)				
II OPERATIONS				
10. Trained operator on site at Class I and III during operation? 62-701.500(1)	<input checked="" type="checkbox"/>			
11. Approved operating plan, complete operating records and all permit support documents available? 62-701.500(2)&(3)&(4)&(13)		<input checked="" type="checkbox"/>		
12. Gas monitoring according to permit? 62-701.400(10)(c) and 62-701.500(9)				<input checked="" type="checkbox"/>
13. Gas controlled to minimize off site odors? 62-701.400(10)(a)				<input checked="" type="checkbox"/>
14. At least one spotter at each working face during operation at Class I and III? 62-701.500(1)			<input checked="" type="checkbox"/>	
15. Load checking program implemented? 62-701.500(6)			<input checked="" type="checkbox"/>	
16. Waste compaction as required? 62-701.500(7)(a)			<input checked="" type="checkbox"/>	
17. In compliance with all permit specific conditions? 62-701.320(1)		<input checked="" type="checkbox"/>		
18. Working face/grade above ground no greater than 3 to 1 rise? 62- 701.500(7)(c)			<input checked="" type="checkbox"/>	
19. Narrow working face practiced? 62-701.500(7)(d)		<input checked="" type="checkbox"/>		
20. Only permitted waste types disposed of? 62-701.340(3) and 62-701.500(2)(c)&(6)(a)	<input checked="" type="checkbox"/>			
21. In compliance with prohibition on unauthorized scavenging? 62-701.500(7)(h)	<input checked="" type="checkbox"/>			
22. Required signs for operational directions and public information? 62-701.500(11)(h)	<input checked="" type="checkbox"/>			
23. Weighing or measuring of incoming waste? 62-701.500(4)(a)&(2)(d)	<input checked="" type="checkbox"/>			
24. Method and sequence of filling waste according to approved plan? 62-701.500(2)(f)		<input checked="" type="checkbox"/>		
25. Sufficient operating equipment? 62-701.500(11)(a)			<input checked="" type="checkbox"/>	
26. Sufficient reserve operating equipment (or other arrangements)? 62-701.500(11)(b)			<input checked="" type="checkbox"/>	
27. Adequate communication facilities? 62-701.500(11)(c)	<input checked="" type="checkbox"/>			
28. Solid waste being burned in accordance with Department rules? 62-701.300(3)	<input checked="" type="checkbox"/>			
29. Proper control or disposal of asbestos and other special wastes? 62-701.520(4)			<input checked="" type="checkbox"/>	

	YES	NO	Unk	N/A
II OPERATIONS (Continued)				
30. In compliance with prohibition on lead acid battery disposal? 62-701.300(8)(a)	✓			
31. In compliance with prohibition on used oil disposal? 62-701.300(8)(b)	✓			
32. In compliance with prohibition on yard trash disposal in lined landfills? 62-701.300(8)(c)	✓			
33. In compliance with prohibition on white goods disposal? 62-701.300(8)(d)	✓			
34. In compliance with prohibition on whole tire disposal? 62-701.300(8)(e)	✓			
III MAINTENANCE				
35. Effective barrier to prevent unauthorized entry and dumping? 62-701.500(5)	✓			
36. Adequate vector control using approved methods? 62-701.500(7)(e)	✓			
37. Disposal area easily accessible? 62-701.500(12)			✓	
38. Retention and/or detention ponds, ditches, culverts and berms maintained? 62-701.500(10)		✓		
39. Adequate dust control using approved methods? 62-701.500(11)(e)	✓			
40. Litter control maintained? 62-701.500(7)(i) & (11)(g)	✓			
41. Fire protection and fire fighting facilities adequate and operational? 62-701.500(11)(f)			✓	
42. Ground water wells intact and functioning properly? 62-701.510(2)(b) and 62-701.620(7)			✓	
43. Gas vents intact and functioning properly? 62-701.500(9)				✓
44. Leachate control, collection and treatment as required? 62-701.500(8)		✓		
IV WATER MANAGEMENT AND MONITORING				
45. Water quality sampling and testing according to standard procedures and at required frequency? 62-701.510(2)			✓	
46. Mixing of leachate and storm water prevented? 62-701.400(9)(d)		✓		
47. Storm water run-on/runoff controlled, collected and treated as required? 62-701.400(9) and 62-701.500(10)		✓		
48. Leachate sampling and testing as required? 62-701.500(8)			✓	
V COVER				
49. Adequate quantity of acceptable cover material available as stated in permit application? 62-701.330(4)(e)4	✓			
50. Frequency, amount and quality of initial cover as required? 62-701.500(7)(e)	✓			
51. Frequency, amount and quality of intermediate cover as required? 62-701.500(7)(f)	✓			
52. Adequate erosion control? 62-701.500(7)(j)		✓		
VI CLOSURE				
53. Final cover installation according to approved closure design plan? 62-701.600(5)(f)(2)				
54. Facility meets closure requirements prohibiting unauthorized dumping? 62-701.600(5)(i)				
55. All actions for closure completed according to approved closure operation plan? 62-701.600(6)				
56. Final survey, site plan and "Declaration to the Public" filed at county clerks office and certified copy filed with the Department? 62-701.610(2)				
57. In compliance with approved use of closed landfill and integrity of environmental protection is maintained? 62-701.610(7)				
58. Long term care performed according to approved closure plan? 62-701.620				
59. In compliance with all financial assurance requirements? 62-701.630				
VII NON-LANDFILL SITES				
60. Materials recovery facility operation in compliance with all permit conditions and other applicable requirements? 62-701.700				✓
61. Transfer station operation in compliance with all general permit conditions and other applicable requirements? 62-701.801				✓
62. Resource recovery facility in compliance with all permit conditions and other applicable requirements? 62-701.320(1)			✓	
63. Milling facility in compliance with all permit conditions and other applicable requirements? 62-701.320(1)				✓
64. Only authorized wastes disposed of at C&D facility? 62-701.730(6)				✓
65. C&D facility in compliance with all permit conditions and other applicable requirements? 62-701.730 and 62-701.803				✓

Department copy (white)

Facility copy (yellow)

VIII NARRATIVE

Explanation for all "no" responses and other comments (continue on separate sheet if necessary)

#11. — OPERATIONS PLAN NOT REVISED AS PREVIOUSLY REQUESTED AND NOT RESUBMITTED FOR APPROVAL BY FDEP. CURRENT OPERATIONS PLAN CONTAINS MANY ITEMS THAT HAVE CHANGED

#17. — NOT IN COMPLIANCE WITH CONDITION #20 FILLING SEQUENCE HAS CHANGED, #24 FILLING METHOD CHANGED, #25 WORKING FACE NOT MINIMIZED, #21 LEACHATE NOT MANAGED AS DESCRIBED IN OPERATIONS PLAN

#18 — NOT A WORKING FACE AS DESCRIBED IN OPERATIONS PLAN

#24 — NOT FILLED AS SHOWN IN OPERATIONS DRAWINGS

#38 — WASHOUT/DEPRESSION AT END OF CULVERT IN RETENTION POND NEAR DISPOSAL UNIT A-1

#44 — INADEQUATE REMOVAL OF LEACHATE

FROM A-2, AND POSSIBLY SW-1 WHICH ALSO HAD PONDING WATER. LEACHATE REMOVAL REPORT FOR

DECEMBER NOT PROVIDED TO SHOW RECEIVING TREATMENT FACILITIES AS PREVIOUSLY REQUESTED. LEACHATE REMOVAL

RECORDS NOT PROVIDED FOR JANUARY 1-7 BY FRIDAY

JANUARY 9. ~~AS REQUESTED~~

#46 — LEACHATE HOSE LEAKING IN RETENTION POND

#47 — STORMWATER POND ON TOP OF DISPOSAL UNIT A-1 NOT APPROVED BY FDEP

#52 — SEVERAL WASHOUTS BEING REPAIRED ON UNIT A-1. THE MOST SEVERE WASHOUT APPARENTLY CAUSED BY BERM ON TOP OF A-1 NOT APPROVED BY FDEP.

Signed: 
DEP Representative

1/12/98
Date

Received:

Site Representative

Date

\\PASCO\DOCS\DEPT\DEP Reports\Leachate Data\Leachate - NOV97.wkl
PASCO COUNTY: UTILITIES SERVICES BRANCH
LEACHATE REPORT
FISCAL YEAR END 9/30/98

MONTH & DAY	MEASURED RAINFALL	WEST PASCO CLASS I LEACHATE REMOVED						TOTAL LEACHATE REMOVED	SHADY HILLS WWTP	OTHER OFF-SITE WWTP	ON-SITE LEACHATE MANAGEMENT PLANT	TOTAL LEACHATE DISPOSAL	BALANCE
		ASH CELL I	SECOND LOOK	ASH CELL II	SECOND LOOK	SOLID WASTE CELL I	SECOND LOOK						
01-Nov-97	3,500	0	0	25,800	3,900	254,510	0	284,210	254,510	8,000	0	260,510	
02-Nov-97	0,000	0	0	20,800	4,000	0	0	24,800	0	0	0	0	
03-Nov-97	0,000	0	0	13,500	3,300	228,650	0	243,450	228,650	8,000	0	232,650	
04-Nov-97	0,000	0	0	0	3,300	32,790	0	36,090	32,790	0	0	32,790	
05-Nov-97	0,000	0	0	0	2,700	22,290	0	24,990	22,290	0	0	22,290	
06-Nov-97	0,000	0	0	8,000	3,500	18,490	0	25,990	18,490	0	0	18,490	
07-Nov-97	0,000	0	0	0	2,800	13,910	0	16,510	13,910	0	0	13,910	
08-Nov-97	0,000	0	0	0	2,800	11,630	0	14,230	11,630	0	0	11,630	
09-Nov-97	0,000	0	0	0	2,800	0	0	2,800	0	0	0	0	
10-Nov-97	0,000	0	0	0	2,300	9,300	0	11,600	9,300	0	0	9,300	
11-Nov-97	0,000	0	0	0	2,300	0	0	2,300	0	0	0	0	
12-Nov-97	0,000	0	0	0	2,800	10,290	0	12,890	10,290	0	0	10,290	
13-Nov-97	0,000	0	1,568	0	2,200	3,420	3,773	10,961	7,193	0	0	7,193	
14-Nov-97	2,000	0	0	0	2,500	55,540	0	59,340	55,540	0	0	55,540	
15-Nov-97	0,000	0	0	0	1,900	42,840	0	51,740	49,940	0	0	49,840	
16-Nov-97	0,000	0	0	0	2,000	0	0	2,000	0	8,000	0	6,000	
17-Nov-97	0,000	0	0	0	2,200	42,560	0	44,760	42,560	0	0	42,560	
18-Nov-97	0,000	0	0	0	2,100	7,920	0	10,020	7,920	0	0	7,920	
19-Nov-97	0,000	0	0	0	1,600	9,430	0	11,030	9,430	0	0	9,430	
20-Nov-97	0,000	0	0	0	2,000	6,920	0	8,920	6,920	0	0	6,920	
21-Nov-97	0,000	0	0	0	1,500	6,910	0	8,410	6,910	0	0	6,910	
22-Nov-97	0,000	0	0	0	1,400	3,440	0	4,840	3,440	0	0	3,440	
23-Nov-97	0,000	0	0	0	0	0	0	0	0	0	0	0	
24-Nov-97	0,000	0	0	0	3,500	11,320	0	14,820	11,320	0	0	11,320	
25-Nov-97	0,000	0	0	0	1,800	0	0	1,800	0	0	0	0	
26-Nov-97	0,000	0	0	0	1,100	2,330	0	3,430	2,330	0	0	2,330	
27-Nov-97	0,000	0	0	0	1,800	0	0	1,800	0	0	0	0	
28-Nov-97	0,000	0	0	0	1,500	0	0	1,500	0	0	0	0	
29-Nov-97	0,000	0	0	0	1,400	3,420	0	4,820	3,420	0	0	3,420	
30-Nov-97	0,000	0	0	0	1,500	0	0	1,500	0	0	0	0	
Nov-97	5,500	0	1,568	98,100	68,000	800,900	3,773	940,341	804,673	18,000	0	822,373	117,568

STAFF
GAUGE
in
A-2

GALLONS
STORED
in
A-2

** West Pasco Class I Leachate has a total of 30 acres, which are comprised of three cells. The cells consist of the following:
- Ash Cell I - 10 acres INTERMEDIATE COVER
- Ash Cell II - 10 acres OPEN
- Solid Waste Cell I - 10 acres OPEN

PASCO COUNTY: UTILITIES SERVICES BRANCH
LEACHATE REPORT
CALENDAR YEAR END 12/31/97

MONTH & DAY	MEASURED RAINFALL	REMOVED						TOTAL LEACHATE REMOVED	SHADY HILLS WWTP	OTHER OFF-SITE WWTP	ON-SITE LEACHATE MANAGEMENT PLANT	TOTAL LEACHATE DISPOSAL	BALANCE
		ASH CELL I	A-1 SECOND LAYER	ASH CELL II	A-2 SECOND LAYER	SOLID WASTE CELL	SW-1 SECOND LAYER						
Jan-97	2.100	159,979	1,911	1,200	0	142,361	5,929	311,380	311,380	0	0	311,380	0
Feb-97	1.600	138,607	2,548	82,100	1,200	158,697	1,176	382,628	382,628	0	0	382,628	0
Mar-97	2.650	86,735	1,225	60,168	0	205,209	2,401	355,738	355,738	0	0	355,738	0
Apr-97	7.300	170	1,715	1,882,100	100	282,330	3,724	1,950,139	975,149	0	974,990	1,950,139	0
May-97	0.800	374,493	1,127	292,800	15,000	433,890	3,430	1,120,740	998,420	0	122,320	1,120,740	0
Jun-97	6.500	82,350	2,744	321,000	24,800	787,078	8,762	1,224,734	1,025,164	0	199,570	1,224,734	0
Jul-97	11.850	137,945	1,323	1,371,800	46,700	2,493,884	3,871	4,055,523	3,758,505	0	297,018	4,055,523	0
Aug-97	7.850	204,289	833	330,300	0	1,788,445	3,875	2,325,542	1,790,120	0	305,655	2,095,775	229,787
Sep-97	8.300	40	1,813	0	55,777	957,830	4,067	1,019,527	961,837	96,000	401,580	1,459,477	(210,163)
Oct-97	8.700	10	2,646	0	121,700	734,530	10,143	869,029	744,873	72,600	432,290	1,249,563	(580,717)
Nov-97	5.800	0	1,568	66,100	68,000	800,900	3,773	940,341	804,873	18,000	0	822,873	(473,049)
Dec-97	0.000	0	0	0	0	0	0	0	0	0	0	0	(473,049)
1997	61.550	1,182,918	19,453	4,187,568	333,277	8,783,154	48,951	14,555,321	12,108,347	166,600	2,733,423	15,028,370	(473,049)

** West Pasco Class I Landfill has a total of 30 acres, which are comprised of three cells. The cells consist of the following:
 - Ash Cell I - 10 acres INTERMEDIATE COVER
 - Ash Cell II - 10 acres OPEN
 - Solid Waste Cell I - 10 acres OPEN

12-31-1997 4:17PM

FROM ENVIRONMENTAL 813 847 8064

P. 4

PASCO COUNTY: UTILITIES SERVICES BRANCH

LEACHATE REPORT

FISCAL YEAR END 9/30/98

31-Dec-97

WEST PASCO

MONTH & DAY	ASH CELL I	SECOND LINER	ASH CELL II	SECOND LINER	MEASURED RAINFALL	NOTES
14-Dec-97	0	0	0	1,900	0.000	
15-Dec-97	0	0	12,000	2,100	2.500	
16-Dec-97	113,000	0	12,000	1,400	0.000	
17-Dec-97	107,100	0	12,000	1,400	0.000	
18-Dec-97	105,300	0	12,000	1,800	0.000	
19-Dec-97	97,700	0	24,000	1,300	0.000	
20-Dec-97	90,500	0	12,000	1,400	0.000	
21-Dec-97	116,800	0	16,000	1,900	0.000	
22-Dec-97	104,300	1,029	24,000	1,700	0.000	
23-Dec-97	0	0	12,000	1,600	0.000	
24-Dec-97	0	0	12,000	1,800	0.000	
25-Dec-97	0	0	0	1,400	2.700	
26-Dec-97	0	0	12,000	2,000	0.000	
27-Dec-97	8,100	0	6,000	1,600	3.700	
28-Dec-97	78,900	0	12,000	1,800	0.000	
29-Dec-97	18,000	0	12,000	1,500	0.100	
30-Dec-97	23,000	0	12,000	2,200	0.300	
31-Dec-97	0	0	12,000	1,100	0.000	



PASCO COUNTY, FLORIDA

RECEIVED
JAN 15 1998
Department of Environmental Protection
BY SOUTHWEST DISTRICT

DADE CITY (352) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (813) 856-0119
FAX (813) 856-0007

PASCO COUNTY SOLID WASTE
RESOURCE RECOVERY FACILITY
14230 HAYS ROAD
SPRING HILL, FL 33610

January 12, 1998

Richard E. Mayer, P.E.
Law Engineering and Environmental
Services
4919 West Laurel Street
Tampa, FL 33507

RE: Salt Bag Removal - West Pasco Disposal Unit A-2
Florida Department of Environmental Protection (DEP)
Letter of January 7, 1998

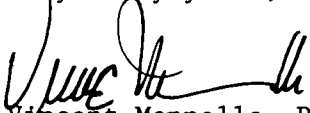
Dear Mr. Mayer:

I have received a copy of the above referenced letter sent to you; the following is our response regarding the DEP's suggested recommendations:

- * Recommendation Number One - accepted.
- * Recommendation Number Two - accepted.
- * Recommendation Number Three - accepted.
- * Recommendation Number Four - accepted.
- * Recommendation Number Five - not acceptable and is currently being evaluated for determination at a later date.

Please prepare a response to the DEP for Pasco County expressing our position on the DEP's recommendations.

Very truly yours,


Vincent Mannella, P.E.
Solid Waste Facility Manager

cc: Robert Butera, P.E.III, Division of Waste Management, Florida Department of
Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
Kim Ford, P.E.I, Division of Waste Management, DEP, Tampa, FL
Richard D. Garrity, Ph.D., Director of District Management, DEP, Tampa, FL
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator
Ronald J. Walker, Solid Waste Superintendent



PASCO COUNTY, FLORIDA

DABE CITY (352)521-4274
LAND O' LAKES (813)996-7341
NEW PORT RICHEY (813)856-0119
FAX (813)856-0007

PASCO COUNTY SOLID WASTE
RESOURCE RECOVERY FACILITY
14230 HAYS ROAD
SPRING HILL, FL 34610

January 12, 1998

Richard E. Mayer, P.E.
Law Engineering and Environmental
Services
4919 West Laurel Street
Tampa, FL 33507

RE: Intermediate Construction for Disposal Unit A-1
Florida Department of Environmental Protection
Letter of January 8, 1998

Dear Mr. Mayer:

I have reviewed the recommendations noted in the Florida Department of Environmental Protection's (DEP) letter to you, of January 8, 1998. The following is Pasco County's response to the DEP recommendations:

- * Recommendation Number One - accepted.
- * Recommendation Number Two - rejected; there exists no privity of contract between the selected Contractor and the DEP. Further, Pasco County may opt to extend construction time for cause; this item is not within DEP jurisdiction.
- * Recommendation Number Three - accepted.

Please prepare response to DEP expressing Pasco County's position on the DEP's recommendations.

Very truly yours,


Vincent Mannella, P.E.
Solid Waste Facility Manager

VM/drc

cc: Robert J. Butera, P.E.III, Division of Waste Management, Florida Department of
Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
Kim Ford, P.E.I, Division of Waste Management, DEP, Tampa, FL
Richard D. Garrity, Ph.D., Director of District Management, DEP, Tampa, FL
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator
Ronald J. Walker, Solid Waste Superintendent

PASCO COUNTY
UTILITIES SERVICES BRANCH

Conversation Record

Date January 7, 1998

Subject Salt Bags in A-2

Time _____

County _____

Name Kim Ford, P.E.I

Telephone No. _____

Representing Florida Department of Environmental Protection

☒ Phoned Me ☐ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other individuals involved in conversation/meeting None

Summary of conversation/meeting Started Dike in Unit A-2; discussed the following in removing salt bags: 1) Don't damage liner, 2) Contain clay, 3) Do not damage salt bags, 4) Store boxes in A-2, and 5) Future salt bags capsulated in geo membrane or hauled from site.

OK to dump ash in leachate; do not worry about sketch of new salt storage area.

The 5 items are recommendations - not from jurisdiction or law - Dick Mayer was in contact with DEP and will do certain things; Dick Mayer's telephone discussion with Kim Ford in an integral part of this record.

VM/drc

cc: Kim Ford, P.E. I, Division of Solid Waste Management, Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
Richard D. Garrity, Ph.D., Director of District Management, DEP, Tampa, FL
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator (Utilities Services)

(continue on another sheet, if necessary)

Signature 

Title Vincent Mannella, P.E.
Solid Waste Facility Manager

tele:ut

Bob LB

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 1/12/98 Subject W PASCO LEACHATE
Time 2:15 Permit No. _____

County _____
M John Daily Telephone No. 247 3451

Representing Tampa WWTP

[] Phoned Me [☒] Was Called [] Scheduled Meeting [] Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting _____

WE DISCUSSED THE TREATMENT OF W PASCO ASH LEACHATE &
JD SAID PASCO County is allowed to INCREASE
DISPOSAL TO WWTP BY 12,000 GPD WEEK IF NO
PROBLEMS, SO TODAY IS UP TO 36,000 GPD. JD SAID
THIS IS IN COMPLIANCE WITH A LETTER BY GARDINER
WHICH REQUESTED INCREMENTAL INCREASE AND
EVALUATION & JD CONCERN IS CHLORIDES AND METALS
TO PREVENT PLANT UPSET AND SLUDGE PROBLEMS, LEACHATE
SAMPLED EACH WEEK. WWTP IS A CONTINUOUS FLOW
AND IT TAKES ABOUT 20 MINUTES TO UNLOAD A
TANKER AT THE WWTP

[Signature]

(continue on another
sheet, if necessary)

Signature _____

Title _____



PASCO COUNTY, FLORIDA

RECEIVED
JAN 08 1998
D E P

DADE CITY (352)521-4274
LAND O'LAKES (813)996-7341
NEW PORT RICHEY (813)847-8145
FAX (813)856-0007

UTILITIES SERVICES BRANCH
RESOURCE RECOVERY FACILITY
14230 HAYS ROAD
SPRING HILL, FL 34610

January 4, 1998

Mr. Peter H. Burghardt
Environmental Specialist
Division of Water Facilities
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: Transport of Leachate from Pasco County
Disposal Unit A-2 has Continued to Date

Dear Mr. Burghardt:

From December 30, 1997 through January 4, 1998, zero (0) gallons of leachate were transported to the New Port Richey Wastewater Treatment Plant (WWTP).

From December 30, 1997 through January 4, 1998, 136,800 gallons of leachate were transported to the Hooker Point WWTP in Tampa.

Seven day transportation of leachate is still on schedule, and hopefully, the Tampa WWTP operation will increase in volume in the near future.

Very truly yours,

Vincent Mannella, P.E.
Solid Waste Facility Manager

VM/drc

cc: Joseph G. Amato, P.E.II, Division of Water Facilities, Florida Department of
Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
Robert J. Butera, P.E.III, Division of Waste Management, DEP, Tampa, FL
John Daily, Industrial Wastewater Supervisor, City of Tampa Wastewater Treat-
ment Plant, 2700 Maritime Boulevard, Tampa, FL 33605
Kim Ford, P.E.I, Division of Solid Waste Management, DEP, Tampa, FL
Richard D. Garrity, Ph.D., Director of District Management, DEP, Tampa, FL

Mr. Peter H. Burghardt
January 4, 1998

John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator (Utilities Services)
Ronald J. Walker, Solid Waste Superintendent



PASCO COUNTY, FLORIDA

RECEIVED

JAN 08 1998

DEP

DADE CITY (352)521-4274
LAND O'LAKES (813)996-7341
NEW PORT RICHEY (813)847-8145
FAX (813)856-0007

UTILITIES SERVICES BRANCH
RESOURCE RECOVERY FACILITY
14230 HAYS ROAD
SPRING HILL, FL 34610

December 31, 1997

Mr. Peter H. Burghardt
Environmental Specialist
Division of Water Facilities
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: Transport of Leachate from Pasco County
Disposal Unit A-2 has Continued to Date

Dear Mr. Burghardt:

From December 20, 1997 through December 30, 1997, zero gallons of leachate were transported to the New Port Richey Wastewater Treatment Plant (WWTP).

From December 20, 1997 through December 30, 1997, 132,000 gallons of leachate were transported to the Hooker Point WWTP in Tampa.

Seven day transportation of leachate is still on schedule, and hopefully, the Tampa WWTP operation will increase in volume in the near future.

Please be advised, we have been the recipient of 6.8 inches of rain from December 24, 1997 to date; an increase in leachate amounting to 3,3030,207 gallons.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Vincent Mannella", is written over a horizontal line.

Vincent Mannella, P.E.
Solid Waste Facility Manager

VM/drc

cc: Joseph G. Amato, P.E.II, Division of Water Facilities, Florida Department of
Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
Robert J. Butera, P.E.III, Division of Waste Management, DEP, Tampa, FL
John Daily, Industrial Wastewater Supervisor, City of Tampa Wastewater Treatment
Plant, 2700 Maritime Boulevard, Tampa, FL 33605

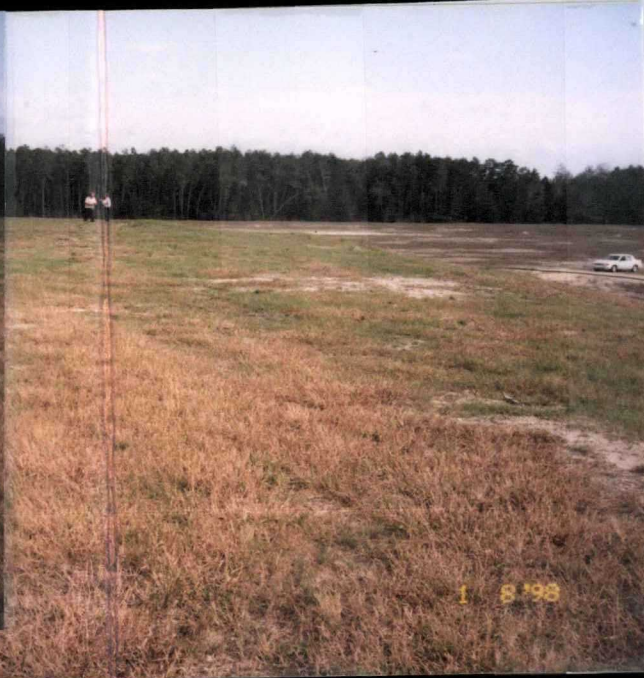
Mr. Peter H. Burghardt
January 4, 1998

Kim Ford, P.E.I, Division of Solid Waste Management, DEP, Tampa, FL
Richard D. Garrity, Ph.D., Director of District Management, DEP, Tampa, FL
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator (Utilities Services)
Ronald J. Walker, Solid Waste Superintendent

West Pasco

KBF, RSB

1/8/98



— WEST PASCO
KBF, RJB

—
AND TOP
OF A-1
EXCESS LEACHATE
PUMPED
TO
A-2
—





Waste tire
west pasco
KBF, RJB



pumping top of A-1
west pasco
KBF, RJB



WASTE
TILES

— WEST PASCO
KBF, RJB —

SALT
BAGS
A-2

— WEST PASCO
KBF, RJB —

A-2

— WEST PASCO
KBF, RJB —

PENDING
TOP AD

— WEST PASCO
KBF, RJB —



EROSION
A-1

WEST PASCO
KBF, RJB

CLASSTILL
NO PONDING
IN CELL

WEST PASCO
KBF, RJB

EXPOSED
ASH
FROM EROSION
A-1

WEST PASCO
KBF, RJB

EROSION
A-1

WEST PASCO
KBF, RJB



TOP A-1

WEST PASCO
KBF, RJB

erosion
A-1

WEST PASCO
KBF, RJB

CLASS III
minimal
ponding

WEST PASCO
KBF, RJB

1/8/98

WASHOUT
DEPRESSION
AT CULVERTS
FROM
A-2

WEST PASCO
KBF, RJB



LEACHATE HOSE
A-1

WEST PASCO
KBF, RJB

EROSION
A-1

WEST PASCO
KBF, RJB

CLASS III
EROSION

WEST PASCO
KBF, RJB

EROSION
A-1

WEST PASCO
KBF, RJB



WASTE
TIRES

— WEST PASCO
KBF, RJB —

WASTE
TIRE

— WEST PASCO
KBF, RJB —

WASTE
TIRES

— WEST PASCO
KBF, RJB —



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

January 8, 1998

Mr. Richard Mayer, P.E.
Law Engineering
4919 W. Laurel Street
Tampa, FL 33607

RE: Intermediate Cover for Unit A-1
West Pasco Landfill

Dear Mr. Mayer:

The Department has no objection to the construction of a geomembrane cover for disposal unit A-1 as proposed in the project manual (2 volumes) including bid documents, plans and specifications received January 7, 1998, subject to the following conditions:

1. There shall be no excavation in the vicinity of the existing liner system berm and anchor trench;
2. All related work shall be completed within 60 days from the date when contract time commences, and in any event not later than May 1, 1998; and
3. Certification of construction completion and record drawings shall be provided to the Department within 30 days after construction completion.

If you have any questions you may call me at (813) 744-6100, extension 382.

Sincerely,

Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management

KBF/ab

cc: Douglas Bramlett, Pasco County
Vince Mannella, P.E., Pasco County
Richard Garrity, DDM - FDEP Tampa
William Kutash, Administrator, FDEP Tampa
Robert Butera, P.E., FDEP Tampa



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

January 7, 1998

Mr. Richard Mayer, P.E.
Law Engineering
4919 W. Laurel Street
Tampa, FL 33607

RE: Salt Bag Removal
West Pasco Landfill

Dear Mr. Mayer:

The Department has no objection to the salt bag removal concept as proposed in your January 6, 1998 letter subject to the following conditions:

1. Construction of the containment berm shall include no excavation or disturbance of the existing liner system;
2. Care shall be taken to prevent clayey sand from migrating into areas outside of the containment berm;
3. Loading methods shall minimize further damage to the salt bags;
4. Each roll-off container shall be stored within the perimeter of disposal unit A-2 until removed off-site; and
5. Future salt bags produced shall be loaded directly into roll-offs for immediate off-site removal or encapsulated in a geomembrane within A-2.

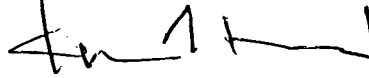
The Department advises that use of clayey sand within unit A-2 may adversely affect the performance of the drainage sand layer. Any problems requiring further corrective actions resulting from this activity may result in enforcement. The Department requests that immediate attention be given to the design, FDEP approval, construction and operation of the geomembrane to encapsulate salt bags, and the deployment of rain cell covers within A-2 to minimize leachate generation.

Mr. Richard Mayer, P.E.
Law Engineering

January 7, 1998
Page Two

If you have any questions you may call me at (813) 744-6100,
extension 382.

Sincerely,



Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management

KBF/ab

cc: Douglas Bramlett, Pasco County
Vince Mannella, P.E., Pasco County
Richard Garrity, DDM - FDEP Tampa
William Kutash, Administrator, FDEP Tampa
Robert Butera, P.E., FDEP Tampa

Bob RB

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 1/7/98 Subject W PASCO Canal
Time 4:45 Permit No. _____
County PASCO
M Vince marmella Telephone No. _____
Representing PASCO County
[] Phoned Me [☒] Was Called [] Scheduled Meeting [] Unscheduled Meeting
Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting I RETURNED HIS CALL &
UN SAID HE CALLED DOUG BRAMLET TO EXPLAIN THAT
I WANTED TO SEE DESIGN DETAILS FOR BERM AROUND
SALT BAGS. DOUG TOLD VINCE THAT I DID NOT GIVE
HIM HIS PAYCHECK. AND FOR VINCE TO PROCEED WITH THE
BERM. VINCE SAID BERM IS BEING BUILT NOW AND
CLAY IS TOO PLASTIC. I EXPLAINED THAT I DRAFTED
A RESPONSE TO DICK MAYERS PROPOSAL FOR THE BERM
WITH NO OBJECTION SUBJECT TO 5 CONDITIONS. VINCE
ASKED FOR MY AUTHORITY TO PLACE CONDITIONS ON APPROVAL.
I SAID IT WAS MY PROFESSIONAL OPINION AND THE
NATURE OF MY JOB AND THE CONDITIONS ARE A WARNING.

(continue on another
sheet, if necessary)

Signature [Signature]
Title _____

**LAW**

ENGINEERING AND ENVIRONMENTAL SERVICES

FACSIMILE TRANSMITTAL

Law Engineering, and Environmental Services, Inc.
4919 West Laurel Street
Tampa, Florida 33607

	To	From
Name:	Douglas S. Bramlett, Vince Mannella, Kim Ford	Dick Mayer
Company:	n/a	Law Eng. Env. Services Inc.
City/State:	Tampa, Florida	Tampa, Florida
Voice Fax #:		813/289-0750 813/289-5474
*TOTAL PAGE(S): 1	DATE:	OPERATOR:

* = includes cover page

PROJECT/PROPOSAL NAME/NUMBER: Pasco Leachate Minimization 40141-7-0317

This is a record of a telephone conversation between Richard Mayer and Kim Ford January 7, 1998 at 8:45am. Kim had comments about the letter, dated January 5, 1998 LAW sent to FDEP in response to the warning letter, dated November 18, 1997. The key points of the conversation were:

Provide bid documents for A-1 construction so FDEP can review.

Provide a drawing showing the grading plan and plan for encapsulation of the salt in A-2. The material beneath the salt should be at least a 20 mil high density geomembrane with at least 3 inches of clean and preferably clayey soil between the geomembrane and the ash. In the letter January 5 LAW stated that the County plans to fill the area along the south berm first and Kim recommended starting the filling process from the west end and orienting the salt storage area in a west to east direction within this area.

← why?

Provide construction details for the raised manhole and valve arrangement for A-1.

Provide a request for a alternative cover for the soil to be placed - ?
beneath the rain tarp in A-2. The rule says this is intermediate cover
and the County needs to request an alternative.

Provide a complete revised operations plan or at minimum reference
the specific sections that are to be revised. If you have any questions
please call at (813) 289-0750.

Dick Mayer

h:\users\dickmayer\forms\fax.frm

**LAW**

Engineering & Environmental Services

TO:

Kim Faid

COMPANY:

FDEP

FAX NUMBER:

FROM:

D. Mayer

Number of Pages Including This Cover:

2

MESSAGE:

*Letter about Salt
re-location*

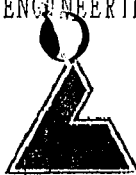
If you experience difficulty receiving this transmittal, please contact:

Law Engineering and Environmental Services, Inc.

4919 W. Laurel Street

Tampa, Florida 33607

(813) 289-0750 • Fax (813) 289-5474

**LAW**

ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

January 6, 1997

Bob RB

Mr. Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Subject: West Pasco Landfill
Disposal Unit A-2
Number PA87-23, Pasco County
LAW Project 40141-7-0317

Dear Mr. Ford:

Law Engineering and Environmental Services, Inc. (LAW), on behalf of Pasco County, is providing this letter describing a plan to remove the salt bags from the west end of Disposal Unit A-2. LAW understands Vince Mannella contacted you by telephone on January 6, 1998, to inform you of the County's plans.

The County intends to construct a temporary bermed containment area, pump leachate out to lower liquid level within the area, then removed the bags. The containment area will be approximately 140 feet square with two sides formed by a five-foot high berm constructed from a clayey sand. The foundation for the berms will be 18 inches ash over the 2-foot drainage layer. The other two sides will be the existing disposal unit berm. The area inside the containment area will be pumped and the leachate discharged into the disposal unit. Once the leachate level is lowered (18 inches) sufficiently, the salt will be removed and placed in visquene-lined roll offs and stored within the perimeter of A-2 until it can be hauled to a permitted disposal facility.

*west side**- ?*

Sincerely,

LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

Richard E. Mayer
Richard E. Mayer, P.E.
Principal Engineer
Florida Registration 41759

George W. Ellsworth
George W. Ellsworth, P.G.
Senior Geologist
Florida Registration 00848

REM/GWF/cj/ENVIRO/COMMON/4014170317.L02

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 1/7/93 Subject W PASCO LANDFILL
Time 4:45 Permit No. _____
County PASCO
M Vince manella Telephone No. _____
Representing PASCO County
[] Phoned Me [☒] Was Called [] Scheduled Meeting [] Unscheduled Meeting
Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting I RETURNED HIS CALL &
VM SAID HE CALLED DOUG BRANLEY TO EXPLAIN THAT
I WANTED TO SEE DESIGN DETAILS FOR BERM AROUND
SALT BAGS. DOUG TOLD VINCE THAT I DID NOT GIVE
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BERM & VINCE SAID BERM IS BEING BUILT NOW AND
CLAY IS TOO PLASTIC. I EXPLAINED THAT I DRAFTED
A RESPONSE TO DICK MAYERS PROPOSAL FOR THE BERM
WITH NO OBJECTION SUBJECT TO 5 CONDITIONS. VINCE
ASKED FOR MY AUTHORITY TO PLACE CONDITIONS ON APPROVAL.
I SAID IT WAS MY PROFESSIONAL OPINION AND THE
NATURE OF MY JOB AND THE CONDITIONS ARE A WARNING.

(continue on another
sheet, if necessary)

Signature [Signature]

Title _____



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (813) 847-8145
FAX (813) 856-0007

PASCO COUNTY SOLID WASTE
RESOURCE RECOVERY FACILITY
14230 HAYS ROAD
SPRING HILL, FL 34610

RECEIVED
JAN 08 1998
D
E
P

January 6, 1998

Mr. Kim B. Ford, P.E. I
Division of Waste Management
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: Leachate Hauling to Tampa Wastewater Treatment
Plant (WWTP) from Pasco County

Dear Mr. Ford:

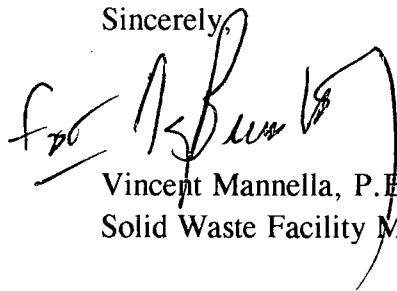
Pursuant to our telephone conversation this date regarding your inquiry on limited hauling of impounded leachate to the Tampa WWTP, the following response is submitted:

- ▶ This response to your request for a statement is in written letter form.
- ▶ Tampa has directed Pasco County to a leachate delivery of 12,000 gpd to assure their plant's quality discharge.
- ▶ Mr. John Daily, Industrial Waste Supervisor, advised me by telephone today that this limit was suggested by the Florida Department of Environmental Protection.
- ▶ I have been informed that we may increase our leachate delivery to Tampa WWTP starting today to 24,000 gpd.
- ▶ If the delivery of 24,000 gpd does not produce any deliveries effects on the Tampa WWTP, Pasco County may be permitted to increase leachate delivery again the near future.

Mr. Kim B. Ford, P.E. I
January 6, 1998

By copy of this letter to Mr. Daily, he will be kept current to our discussions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Vincent Mannella", is written over the typed name and title.

Vincent Mannella, P.E.
Solid Waste Facility Manager

VM/mvv/4/ford

cc: Robert J. Butera, P.E. III, Division of Waste Management, Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 233619-8318
John Daily, Industrial Wastewater Supervisor, City of Tampa Wastewater Treatment Plant, 2700 Maritime Blvd., Tampa, FL 33605
Richard D. Garrity, Ph.D., FDEP, Tampa, FL
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator (Utilities Services)
Ronald Walker, Solid Waste Superintendent



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
 LAND O' LAKES (813) 996-7341
 NEW PORT RICHEY (813) 847-8145
 FAX (813) 856-0007

PASCO COUNTY SOLID WASTE
 RESOURCE RECOVERY FACILITY
 14230 HAYS ROAD
 SPRING HILL, FL 34610

January 6, 1998

Post-It™ Fax Note 7671		Date 1/6/98	# of pages 2
To Kim Ford	From V. Manella		
Co./Dept. FDEP	Co. PCJSB		
Phone #	Phone # 813-847-8145		
Fax # 813-744-6084	Fax #		

Mr. Kim B. Ford, P.E. I
 Division of Waste Management
 Florida Department of
 Environmental Protection
 3804 coconut Palm Drive
 Tampa, FL 33619-8318

RE: Leachate Hauling to Tampa Wastewater Treatment
 Plant (WWTP) from Pasco County

Dear Mr. Ford:

Pursuant to our telephone conversation this date regarding your inquiry on limited hauling of impounded leachate to the Tampa WWTP, the following response is submitted:

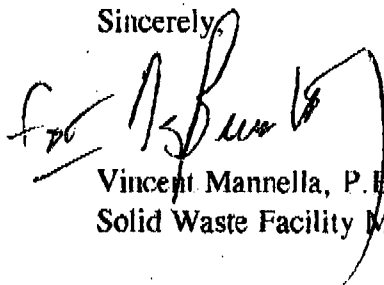
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Mr. Kim B. Ford, P.E. I

January 6, 1998

By copy of this letter to Mr. Daily, he will be kept current to our discussions.

Sincerely,



Vincent Mannella, P.E.
Solid Waste Facility Manager

VM/mvv/4/ford

cc: Robert J. Butera, P.E. III, Division of Waste Management, Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 233619-8318
John Daily, Industrial Wastewater Supervisor, City of Tampa Wastewater Treatment Plant, 2700 Maritime Blvd., Tampa, FL 33605
Richard D. Garrity, Ph.D., FDEP, Tampa, FL
John J. Gallagher, County Administrator
Douglas S. Bramlett, Assistant County Administrator (Utilities Services)
Ronald Walker, Solid Waste Superintendent

FDEP

3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

FAXED

Date:

1/6/98

Number of pages including cover sheet:

4

To:

Jane Mannello

Pinco County

Phone:

813 856 0119

Fax phone:

813 856 0007

CC:

From:

Kim Ford

Phone:

(813) 744-6100

✓ 382

Fax phone:

(813) 744-6125

REMARKS:

☐ Urgent

☐ For your review

☐ Reply ASAP

☐ Please comment

DOUG'S DRAFT

MOVED AS YOU REQUESTED

PLEASE CONTINUE TO SEND
IN LEADLINE RECORDS
IN NEW FORMAT

THANKS

Kim



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (813) 847-8145
FAX (813) 847-8064

RECEIVED
DEC 18 1997
D E P

UTILITIES SERVICES BRANCH
PUB. WKS./UTILITIES BLDG., S-213
7530 LITTLE ROAD
NEW PORT RICHEY, FL 34654

December 16, 1997

Mr. Richard D. Garrity, Ph.D.
Director of District Management
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: West Pasco Class I Landfill
Memorandum of Understanding (MOU)

Dear Dr. Garrity:

As follow-up to our meeting on December 11, 1997 concerning storage and processing of ash monofil leachate in solid waste Cells A-1 and A-2, please accept this letter as our proposal to manage and process excess leachate over the next few months.

The following is a schedule related to each component of our processing and treatment plan to assure compliance with FAC Rule 62-701.500 relative to acceptable volumes of leachate allowed over the primary liners in Cells A-1 and A-2.

1. New Port Richey Wastewater Treatment Plant (WWTP) Co-Treatment

Pasco County again on December 10, 1997 began transporting 12,000 gpd of ash leachate to the New Port Richey WWTP for co-treatment. The tanker loads are being off-loaded and mixed with raw wastewater in the Pasco County Southwest Collection System to provide a blending of leachate and raw wastewater prior to treatment. We feel that this procedure will continue on a weekly basis until the excess amount of leachate is removed. This procedure may be terminated if the New Port Richey WWTP has problems with effluent quality as a result of this co-treatment process.

Dr. Richard D. Garrity
December 16, 1997

2. City of Tampa Advanced WWTP Co-Treatment

Pasco County will begin transporting ash leachate to the Tampa WWTP on or about December 19, 1997. Initially, we will transport 12,000 gpd to the Tampa facility for a three to four (3-4) week period to assure the ash leachate does not cause adverse treatment or biological problems. After the initial delivery period, our schedule is to begin transporting up to 60,000 gpd to the Tampa facility. We anticipate this procedure will continue until May, 1998 or longer if allowed by our industrial permit issued by the City of Tampa.

3. Leachate Management Facility

The Leachate Management Facility (LMF) is scheduled to again begin operations by mid January, 1998. We anticipate this facility will become dependable and fully operational by February, 1998 and will continue on our scheduled 24 hours per day operations thereafter. If we assume 75% capacity after full operations begins, we can process approximately 785,000 gallons per month. This facility will be used at its maximum capacity until and after the excess ash leachate is processed.

4. Shady Hills WWTP Co-Treatment

1 We are proposing to again begin pumping approximately 30,000 gpd of ash leachate to the Shady Hills WWTP for co-treatment. Our existing Consent Agreement will need to be modified to allow this procedure. Our understanding is that your Groundwater Section does not object to this proposal and we are confident the 30,000 gpd will not cause any increase in the existing chloride concentrations in the monitor wells. This process, in conjunction with the other co-treatment plans, is absolutely necessary to provide co-treatment of the excess leachate in Cells A-1 and A-2.

5. Rain Cap - Cells A-1 and A-2

Pasco County is currently contracted with Law Engineering and Environmental Services, Inc. to provide biddable plans and specifications for construction of a rain cap for Cell A-1 and either a rain cap or rain catch basin for Cell A-2. This design will be expedited and we are confident that this project can be advertised for bids in January, 1998. We will provide a construction schedule by January 5, 1998 with our revised operational plan submittal.

Dr. Richard D. Garrity
December 16, 1997

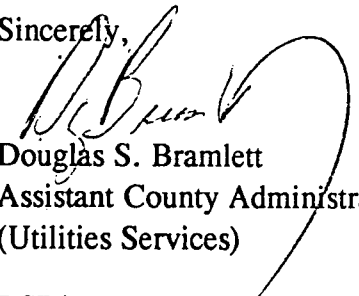
A summary of the above-described projects is provided with the assumption that your office will approve the four (4) projects as proposed.

<u>Site</u>	<u>Amount</u>
1. New Port Richey WWTP	12,000 gpd
2. City of Tampa WWTP	60,000 gpd
3. Leachate Management Facility	26,000 gpd
4. Shady Hills WWTP	<u>30,000 gpd</u>
Total (maximum)	128,000 gpd

As noted, this is the estimated maximum day amount that can be processed.

We request that you review and approve this MOU as Pasco County is proceeding with the above-described actions to process and co-treat the excess ash leachate at the earliest possible date. Assuming that our rain cap/catch basin construction for Cells A-1 and A-2 can be completed by July 1, 1998, we will hopefully be in full compliance no later than October 1, 1998.

Sincerely,



Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv

cc: Robert J. Butera, P.E. III, Division of Waste Management, Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
Richard Mayer, Principal, Law Engineering and Environmental Services, Inc., 4919 West Laurel Street, Tampa, FL 33607
Tom O'Neill, Public Works Director, City of New Port Richey, 5919 Main Street, New Port Richey, FL 34652
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager

Transmit Confirmation Report

No. : 011
Receiver : 8-1-813-856-0007
Transmitter : WASTE MGT TAMPA SWDIST
Date : Jan 06 98 16:25
Time : 02'32
Mode : Norm
Pages : 04
Result : OK

1205 ✓
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 1/6/98 Subject W. PASCO
Time 2:15 Permit No. _____
County PASCO
M Vince Manna Telephone No. _____

Representing _____

[☒] Phoned Me [] Was Called [] Scheduled Meeting [] Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting _____

J. M. DISCUSSED CONTAMINANT OF SALT LACS IN
A BEARDS/DILKS AREA AND BOLLOWS TO PREVENT
LEAKAGE INTO A-2. I ASKED FOR
PROPOSAL IN WRITING AND WILL RESPOND
JIM SAID HAVING TO TAMPA WWRP LIMITED BY
TAMPA BUT WILL HAVE 24,000 /DAY BEGINNING TUES
JIM WILL WRITE LETTER ON THIS ISSUE.

(continue on another
sheet, if necessary)

Signature [Signature]

Title _____



LAW

ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

January 5, 1998

RECEIVED

JAN 05 1998

DEP

Mr. Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Subject: **West Pasco Landfill
Disposal Units A-1 and A-2
Number PA87-23, Pasco County
LAW Project 40141-7-0317**

Dear Mr. Ford:

Law Engineering and Environmental Services, Inc. (LAW), on behalf of Pasco County, has prepared the following responses to your letter dated November 21, 1997, concerning operations at the West Pasco Landfill. A copy of your letter is included in Appendix A. Your comments are repeated in **bold** type below followed by a response to the comment.

On November 18, 1997, the Department sent Warning Letter #WL97-0008SW51SWD regarding Disposal Units A-1 and A-2 (copy attached). Attached are documents concerning additional related issues that have not been resolved.

1. DEP's March 12, 1997 letter and copy of the approved operations plan for the landfill disposal units A-1 and A-2, Sections 8.2.6 and 8.2.8 describe the use of control valves and berms to isolate and minimize leachate generation. **The current method and sequence of filling conflicts with this approved plan. A revised operations plan has been requested and has not been provided. On March 18, 1997, staff observed the bottom of disposal unit A-2 covered with ash rather than segmenting storm water from leachate. Leachate generation has not been minimized.**

Response: The reason Pasco County has not been able to follow the Operations Plan, as approved by the Florida Department of Environmental Protection (FDEP), is because wind storms have repeatedly caused erosion of the drainage layer sand from off the liner on the side slopes of the cell. The County decided to place ash along all the slopes to protect the drainage layer. In addition, the County is disposing of bags filled with chlorides generated from the on-site leachate treatment plant in the western end of disposal unit A-2. In order to place the bags at the western end, it was necessary to construct a road using the ash material to the bag disposal area. The County received authorization from the FDEP to dispose of the bags at the western end of A-2.

An addendum to the Operations Plan is enclosed as Appendix A. This Plan includes a proposed filling sequence and operating measures to reduce the leachate generation rates by limiting rainfall infiltration.

Pasco County's September 29, 1997 letter describes placement of super sacks of chlorides in disposal unit A-2, and CDM's January 11, 1996 letter regards the same. On October 6, 1997, staff observed broken and damaged sacks and uncontained/spilled chlorides. The bag breaches have not been minimized.

Response: The broken bags were those used initially by the County. They have since changed the type of bags, and no other bags have broken. The County is attempting to arrange for a contractor to dispose of the chlorides off site at a permitted facility. In the interim, or if the County is not successful in arranging for off-site disposal, bags brought for disposal will be encapsulated in a 20 mil geomembrane.

✓
BOPS
A-2

2. **Leak detection system flow rates have varied from 5,800 to 2,600 gallons of leachate removed from disposal unit A-2 from October 2 until November 12, 1997. An evaluation describing the significance of these leakage rates has been requested by phone as we discussed on November 21, 1997.**

Response: As you suggested in a telephone conversation on December 2, 1997 LAW has evaluated the leakage rate from the primary liner in A-2 against the leachate action rate in the permit and in an EPA publication. The leachate action rate in the permit is 700 gallons per day. The EPA, in a publication Requirements for Hazardous Waste Landfill Design, Construction and Closure, dated 1989 addresses leakage rates from single liner and composite liner systems and suggests that landfill owner/operators can average daily reading over a 30 day period as long as the average for any one day does not exceed 50 gallons per acre per day. The same publication shows the variation in leakage rates for different heads over a FML alone with a one centimeter hole. The leakage rate varies from 300 gallons per acre per day for a head of 0.1 feet, to 1,000 gallons per acre day for a head of 1 foot to 3,000 gallons per acre day for a head of 10 feet.

The actual leakage rate is currently approximately 1,600 gallons per day. The rate varied during October and early November but has since stabilized. As to the reason for the initially higher rates and fluctuation, one can only speculate. Perhaps leachate was in storage in the space between the two liners or the holes in the primary have filled with silt.

The actual leakage rate is above the action rate in the permit and in the EPA publication but considering that the head over the primary liner has varied from 6 to 10 feet over the primary liner during the past few months the primary liner performance is acceptable. The EPA rates for a head of one to 10 feet vary from 1,000 to 3,000 gallons per acre per day as compared to a measured rate at A-2 of 160 gallons per acre day. The purpose of monitoring the leachate action rate is to decide if a landfill owner/operator needs to initiate a plan for corrective action. The County has been very proactive and is doing everything possible to reduce the head on the liner. Please refer to Appendix B which contains a memorandum of understanding between FDEP and the County describing the County's commitment to reducing the head over the liner by temporarily trucking the leachate off site for treatment to treatment facilities in the area until the on-site plant can be utilized.

The Department requests an amended operations plan to provide for minimized leachate generation and containment of chlorides by December 5, 1997. The amended operations plan should be accompanied by a corrective actions plan to resolve current deviations from the approved operational plan and unfavorable site conditions addressed in this letter and a schedule for completion.

Response: A copy of the revised plan is enclosed.

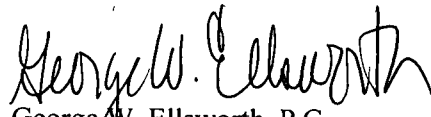
We trust these data adequately respond to you comments. If you have any questions, please call at 813/289-0750.

Sincerely,

LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.



Richard E. Mayer, P.E.
Principal Engineer
Florida Registration 41759



George W. Ellsworth, P.G.
Senior Geologist
Florida Registration 0848

REM/GWE/cjs/ENVIRO/REPORT/4014170317.C&R

APPENDIX A - ADDENDUM TO THE OPERATIONS PLAN
DISPOSAL UNITS A-1 AND A-2

APPENDIX B- MEMORANDUM OF UNDERSTANDING

cc: Douglas S. Bramlett, Pasco County
Vincent Mannella, Pasco County

APPENDIX A

**ADDENDUM TO THE OPERATIONS PLAN
DISPOSAL UNITS A-1 AND A-2**

ADDENDUM TO THE OPERATIONS PLAN FOR DISPOSAL UNITS A-1 AND A-2

Background

This addendum to the operations plan for disposal units A-1 and A-2 is needed to respond to changed conditions that have occurred since the original plans were developed as part of the permitting process. This addendum incorporates agreements with FDEP made by letters and presents new plans for operation of these two disposal units. Briefly the changed conditions that precipitated writing this addendum are:

Disposal Unit A-2 - Wind storms repeatedly caused erosion of the drainage layer sand from off the liner on the side slopes of the cell. The County decided to place ash along all the slopes to protect the drainage layer. In addition, the County began disposing of bags filled with chlorides generated from the on-site leachate treatment plant in the west end of disposal unit A-2. In order to place the bags at the west end it was necessary to construct a road using the ash material to the bag disposal area. The County received authorization from the FDEP to dispose of the bags at the west end of A-2.

The leachate treatment system has not been functional and the site has received significant rainfall over the past few months. As a result the leachate has ponded in the disposal unit because there is no place to dispose of leachate at a rate commensurate with the inflow. The County plans to utilize a rain tarp in combination with a proposed filling sequence to minimize leachate in this disposal unit.

water?

Disposal Unit A-1 - During operations monitoring of the leachate outfall system it was discovered that the existing valves between the leachate collection system and the manholes would not close completely because they are damaged. The leakage rate is on the order of 110,000 gallons per day and because the leachate treatment system has not been operational the County has had no place to dispose of this rate of flow. Installing the plug was the only way to stop flows to the manhole and the pump station further downstream. Obviously, the next step was to replace the valves but it could not be done safely without possible spillage of leachate when the valves are removed. It was decided to place the new valves downstream of the manholes and to abandon the damaged ones in an open position. In order to do that it was necessary to raise the manholes to a height sufficient to allow leachate to rise in the manhole to a level equal to the level of leachate in the disposal unit when the new valve was closed. These activities have been completed.

The County had observed that there was little or no runoff from the surface of A-1 even during intense storm events. Using new valve arrangement at the outfall for the leachate collection system the County decided to estimate the leachate level in the disposal unit. The elevation of the leachate was determined by opening an old valve, closing the new valve and allowing the leachate to rise in the raised manhole up to the level in the disposal unit. The elevation of leachate in the unit is 61.25 or approximately two feet below the top of perimeter berm. The existing cover is not promoting runoff and the disposal unit is filling with rainwater. An alternative cover system is needed and a geomembrane is planned.

where is the geomembrane?

The County is currently hauling the leachate contained in A-1 and A-2 to treatment plants in the area for treatment and disposal. This is a temporary measure until the on-site plant becomes operational and the elevation of leachate in each disposal unit is reduced to below the one foot rule.

Plan

Disposal Unit A-2:

1. The west end of the disposal unit will continue to be used to receive the chloride bags. A 6 to 8 inch soil layer or clean ash with the metals removed will be placed on the ash then a rain tarp (16 mil geosynthetic fabric coated with low density polyethylene) will be laid on top of the soil to provide a liner beneath the bags. Sufficient material will be available on the sides of the bag disposal area to allow covering the top of the bags as the area is filled.

SHOW FILLING
AND GRADING
PLAN
↓

The access road to the west end of the disposal unit will be moved north to be an extension of the entrance. The road will be then approximately parallel to the south berm at a distance of 100 feet off the berm. The area between the berm and the road will be raised to 0.5 to one foot above the top of the berm and graded to promote storm-water runoff to the south. This area will be covered with 6 to 8 inches of earth cover and a rain tarp placed over the soil. Tires connected together by ropes at a 50 feet grid will secure the geomembrane. The area of this portion of the disposal unit is approximately two acres.

NOT
SLOPE
W/ SALT
BAGS
AND
SOIL
?

3. Once the area between the road and the berm is filled and covered the area to the north of the road will be filled starting from the east end of the cell in approximately 20 feet wide (measured east to west) strips. The area around the sump will remain open. The elevation of the ash in this area will be raised to 0.5 to one foot above the berm and graded to the north and east. As each strip is completed 6 to 8 inches of earth cover will be placed over the ash and a rain tarp placed on top. Once the entire disposal unit is filled to above the top of the berms the County will cut the geomembrane into 20 feet wide strips and remove the soil cover and begin the filling sequence again.

12" min.

Disposal Unit A-1 - The entire surface area of this disposal unit will be covered with a 20 mil geomembrane. Tires on a 50 feet grid will be used to secure the geomembrane.

DEEN
REPLACEMENT
BAGS
FOR
OPS PLAN

APPENDIX B
MEMORANDUM OF UNDERSTANDING



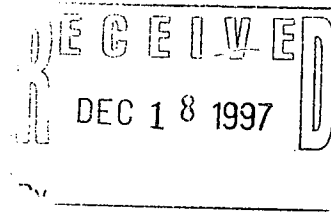
PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (813) 847-8145
FAX (813) 847-8064

UTILITIES SERVICES BRANCH
PUB. WKS./UTILITIES BLDG., S-213
7530 LITTLE ROAD
NEW PORT RICHEY, FL 34654

December 16, 1997

Mr. Richard D. Garrity, Ph.D.
Director of District Management
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318



RE: West Pasco Class I Landfill
Memorandum of Understanding (MOU)

Dear Dr. Garrity:

As follow-up to our meeting on December 11, 1997 concerning storage and processing of ash monofil leachate in solid waste Cells A-1 and A-2, please accept this letter as our proposal to manage and process excess leachate over the next few months.

The following is a schedule related to each component of our processing and treatment plan to assure compliance with FAC Rule 62-701.500 relative to acceptable volumes of leachate allowed over the primary liners in Cells A-1 and A-2.

1. New Port Richey Wastewater Treatment Plant (WWTP) Co-Treatment

Pasco County again on December 10, 1997 began transporting 12,000 gpd of ash leachate to the New Port Richey WWTP for co-treatment. The tanker loads are being off-loaded and mixed with raw wastewater in the Pasco County Southwest Collection System to provide a blending of leachate and raw wastewater prior to treatment. We feel that this procedure will continue on a weekly basis until the excess amount of leachate is removed. This procedure may be terminated if the New Port Richey WWTP has problems with effluent quality as a result of this co-treatment process.

Dr. Richard D. Garrity
December 16, 1997

2. City of Tampa Advanced WWTP Co-Treatment

Pasco County will begin transporting ash leachate to the Tampa WWTP on or about December 19, 1997. Initially, we will transport 12,000 gpd to the Tampa facility for a three to four (3-4) week period to assure the ash leachate does not cause adverse treatment or biological problems. After the initial delivery period, our schedule is to begin transporting up to 60,000 gpd to the Tampa facility. We anticipate this procedure will continue until May, 1998 or longer if allowed by our industrial permit issued by the City of Tampa.

3. Leachate Management Facility

The Leachate Management Facility (LMF) is scheduled to again begin operations by mid January, 1998. We anticipate this facility will become dependable and fully operational by February, 1998 and will continue on our scheduled 24 hours per day operations thereafter. If we assume 75% capacity after full operations begins, we can process approximately 785,000 gallons per month. This facility will be used at its maximum capacity until and after the excess ash leachate is processed.

4. Shady Hills WWTP Co-Treatment

We are proposing to again begin pumping approximately 30,000 gpd of ash leachate to the Shady Hills WWTP for co-treatment. Our existing Consent Agreement will need to be modified to allow this procedure. Our understanding is that your Groundwater Section does not object to this proposal and we are confident the 30,000 gpd will not cause any increase in the existing chloride concentrations in the monitor wells. This process, in conjunction with the other co-treatment plans, is absolutely necessary to provide co-treatment of the excess leachate in Cells A-1 and A-2.

5. Rain Cap - Cells A-1 and A-2

Pasco County is currently contracted with Law Engineering and Environmental Services, Inc. to provide biddable plans and specifications for construction of a rain cap for Cell A-1 and either a rain cap or rain catch basin for Cell A-2. This design will be expedited and we are confident that this project can be advertised for bids in January, 1998. We will provide a construction schedule by January 5, 1998 with our revised operational plan submittal.

Dr. Richard D. Garrity
December 16, 1997

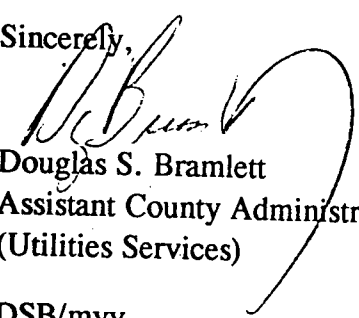
A summary of the above-described projects is provided with the assumption that your office will approve the four (4) projects as proposed.

<u>Site</u>	<u>Amount</u>
1. New Port Richey WWTP	12,000 gpd
2. City of Tampa WWTP	60,000 gpd
3. Leachate Management Facility	26,000 gpd
4. Shady Hills WWTP	<u>30,000 gpd</u>
Total (maximum)	128,000 gpd

As noted, this is the estimated maximum day amount that can be processed.

We request that you review and approve this MOU as Pasco County is proceeding with the above-described actions to process and co-treat the excess ash leachate at the earliest possible date. Assuming that our rain cap/catch basin construction for Cells A-1 and A-2 can be completed by July 1, 1998, we will hopefully be in full compliance no later than October 1, 1998.

Sincerely,



Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv

cc: Robert J. Butera, P.E. III, Division of Waste Management, Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8318
~~Richard Mayer~~ Principal, Law Engineering and Environmental Services, Inc., 4919 West Laurel Street, Tampa, FL 33607
Tom O'Neill, Public Works Director, City of New Port Richey, 5919 Main Street, New Port Richey, FL 34652
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager

BID NO: 98-037

DEC 31 1997

DATE: December 29, 1997

INVITATION TO BID

Sealed bids for construction of the Intermediate Cover for Cell A-1 West Pasco Landfill at the Resource Recovery Facility, addressed to Pasco County Purchasing Department, 8919 Government Drive, New Port Richey, Florida 34654, will be received at the office of Frank Fortino, Purchasing Director, Pasco County, until FEBRUARY 5, 1998 @ 2:00 pm, and then will be publicly opened and read. Any bids received after the time and date specified will not be considered.

The project contemplated includes furnishing all labor equipment and materials necessary to install the Intermediate Cover for Cell A-1, West Pasco Landfill.

Drawings and specifications may be examined in the offices of:

Pasco County Purchasing Department
Pasco County Government Complex
8919 Government Drive
New Port Richey, FL 34654

Pasco County Resource Recovery
Facility (Second Floor, Pasco
County Office)
14230 Hays Road
Spring Hill, FL 34610

Law Engineering & Environmental Services, Inc.
4919 W. Laurel Street
Tampa, FL 33607
(813) 289-0750

A copy of the documents may be obtained from Law Engineering & Environmental Services, 4919 W. Laurel Street, Tampa, FL 33607 upon payment of \$50.00 for each document (Florida sales tax is included). Return of the documents is not required, and the amount paid for the documents is non-refundable.

A pre bid conference will be held on JANUARY 14, 1998 @ 10:00 am at the Utilities/ Public Works Building, 7530 Little Road, Suite 225, New Port Richey, FL 34654.

Each bid must be submitted, in triplicate, on the prescribed proposal form and accompanied by bid security on the prescribed form, payable to Board of County Commissioners, in an amount not less than five percent (5%) of the base bid amount.

The successful bidder will be required to furnish the necessary additional bond(s) for the faithful performance of the contract, as prescribed in the contract documents.

In order to perform public work, the successful bidder shall, as applicable hold or obtain such contractors' and business licenses as required by state statutes.


The County is not responsible for expenses incurred prior to the award of bid by the Board of County Commissioners.

Envelope Must Be Identified As Follows:

NAME OF ITEM BEING BID: Intermediate Cover for Cell A-1 West Pasco Landfill

BID NO: 98-037

OPENING DATE: February 5, 1998 @ 2:00


Frank Fortino
Purchasing Director

RECEIVED
JAN 02 1998
BY SOUTHWEST DISTRICT
Department of Public Works

To:
Kim Ford

From: Doug
Bramlett