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December 18, 2015

Mr. Henry Freedenberg, PE, PG
Solid Waste Section
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 4565
Tallahassee, FL 32399

RE: Lena Road Class I Landfill, Manatee County
Application for Renewal of Operation Permit
WACS No. 44795
Permit No.: 39884-021-SO-01

Dear Mr. Freedenberg:

Please accept this response to your request for additional information letter dated, November 25, 2015. FDEP's questions are excerpted below followed by our responses in bold.

1. Part R Financial Assurance Part V, Item 5 Long-Term Care: Leachate Off-Site Disposal Coasts (62-701.630(3)(c). The disposal cost for 6,063,000 gallons per year of leachate is included in the long-term care (LTC) estimate. This estimate is based on a "21 month Rolling average" of leachate generation rates. The provided chart includes 20 months of data, five "wet" months (June, July, August, September and October) with higher rainfall with the remaining 15 months generally considered drier. Review of the monthly leachate monitoring reports from 2010 through October 2015 indicates an average leachate generation rate of 14, 400,000 gallons per year from Stage I and Stage III with a maximum of 20,560,308 gallons reported in 2010. The LTC cost estimate submitted in February 2010 in support of the prior permit renewal included an estimated annual leachate volume of 28,000,000 million gallons per year. The historical leachate disposal costs provided appear to include a monthly customer charge of \$861.69. This charge is not included in the LTC costs provided for leachate disposal. Please reconcile the discrepancy in the leachate generation rates predicted by the "21-month rolling average" and the leachate monitoring reports from 2010 through October 2015 and adjust the unit cost for leachate disposal to include the monthly customer charge if this charge is applicable.

Response: The quantities, unit costs, total costs and description for this item in the attachment to the Financial Assurance Cost Estimate Form have all been revised to address the discrepancies identified in this comment and to

better estimate the quantity and cost of leachate treatment. A complete revised financial assurance re-calculation package is provided with this submittal. The estimated quantities for this item are for the post closure conditions; however, the current observed leachate generation quantities are provided for reference purposes. The post closure leachate quantities should be significantly less than the current quantities once an impervious cap is placed on the landfill. An estimate of the slurry wall seepage contribution to the overall leachate quantity is also been provided and reveals that the slurry wall seepage is a relatively small amount. Thus a literature referenced value for post closure leachate generation is used to estimate post closure leachate generation. To provide a conservative estimate and to account for slurry wall seepage, the upper end of the published range of post closure leachate generation observed at various landfills (22 gal/ac/day) is used. This change to the method of estimating post closure leachate generation calculation results in a reduction of the estimated quantity; however, the addition of the monthly customer charge results in a significant increase in the unit cost for this item. The overall result is a slight reduction in the total cost for the line item.

2. As per 62-701.500(4)(a), please adjust Figure K-2 on page K-13 of your Operation Permit application to reflect county of origin of the waste.

Response: Figure K-2 has been revised to include provision to indicate out of county waste. The revised page K-13 is attached with this letter and the revised Section K is provided on a CD enclosed with this submittal.

3. Florida Jetclean performed high pressure water-jetting of the leachate collection pipe during June/July 2015. Please ask Florida Jetclean to supply .mp4 files of any video inspection records, if applicable, that were collected during this activity.

Response: The contract with the jetting and inspection company is to perform jetting and only use video inspection if a blockage or other suspected problem is encountered. No such problems were encountered, therefore no video inspection was conducted.

4. On Page K-14 of the Operation Plan, please indicate that an attendant will be on duty during all periods of public access.

Response: The text has been modified to include the requested statement. The revised page K-14 is attached with this letter and a revised Section K is provided on a CD enclosed with this submittal.

5. As per 62-701-320(15) F.A.C. Please provide a training plan for facility personnel. Please include documentation to verify training of personnel (i.e., completion certificates).

Response: Section 1 of the Operation Plan (Section K) has been amended with a description of the Training Plan on page K-1. Also a listing of the current trained operators for Manatee County obtained from the data base of TREEO is provided as Attachment K-4. This listing provides the current certifications and expiration dates for each landfill operator and/or spotter. The revised page K-1 is attached with this letter and a revised Section K is provided on a CD enclosed with this submittal. The TREEO data is provided as Attachment K-4 and is provided as an attachment to this letter and in the CD.

6. On page K2-17 a reference is made to the Manatee County Household Hazardous Waste Collection and Storage Facility Contingency Plan. Please include this in your list of "Documents Included by Reference".

Response: The reference to the Manatee County Household Hazardous Waste Collection and Storage Facility Contingency Plan on page K2-17 has been revised to reference the Solid Waste Division "All Hazard Plan". This plan has been added to the list of referenced documents and is provided in the enclosed CD. A revised list of documents and page K2-17 is provided with this submittal and on the enclosed CD.

Should you have any further questions, please contact me at 941.225.4825 or via email at john.banks@atkinsglobal.com.

Sincerely,


John A. Banks, Jr., PE
Technical Director

Cc: Bryan White, Manatee County Solid Waste Division

