Morris, John R.

From: Morris, John R.

Sent: Wednesday, April 27, 2016 11:51 AM

To: 'Adams, David'

Cc: Byer, Kimberly; Greenwell, Jeffry; Ruiz, Larry; Townsel, Michael; Fuller, Josh; Pelley, Cindy;

Boatwright, Kelley M.; Tafuni, Steven; Morgan, Steve; Dilmore, Cory; Ron Cope (Cope@epchc.org)

Subject: RE: Required written notice to FDEP regarding TH-67 -- Southeast County Landfill, Hillsborough

County, permit #35435-022-SO/01 [facility #41193]

Dear Mr. Adams:

Good morning. Thank you for providing the notification regarding the results of analyses conducted on samples collected from well TH-67 at the referenced facility during February 2016 and April 2016. This notification met the reporting requirements of Rule 62-701.510(6)(a), F.A.C., and of Appendix 3, Para. 4, of the referenced permit.

It appears appropriate to implement the proposed activities to investigate and determine the source of the ground water quality changes at well TH-67 and conduct a supplemental ground water sampling event during May 2016 in lieu of requiring the initiation of evaluation monitoring as described in Rule 62-701.510(6)(a), F.A.C., at this time. The Department does not object to the investigation of the source of ground water quality changes at well TH-67 and the supplemental ground water sampling event to be conducted during May 2016 as described in your message dated April 21, 2016, subject to the following conditions:

- The May 2016 sampling event shall be conducted at well TH-67 and at the shallower well of the following pairs: TH-20A/TH-20B, TH-38A/TH-38B, and TH-66/TH-66A. Based on review of construction details provided for the facility, the shallower wells are TH-20B, TH-38B and TH-66A. In the event that insufficient water is present in the shallower well to allow collection of a representative ground water sample, the corresponding deeper well shall be sampled.
- 2. The results of the ground water events conducted during February 2016, April 2016 and May 2016 shall be submitted in a summary report, including separate sets of ADaPT files (the "LDD," "FDD" and "Error Log" files) prepared for each sampling event.
- 3. The summary report shall include an evaluation of the ground water sampling results and the results of the investigation of the source of the ground water quality changes at well TH-67. The summary report shall also include recommendations regarding a plan of action to correct the source and a schedule for implementation of these activities, as appropriate.
- 4. The summary report shall be submitted within 60 days from completion of laboratory analyses for the May 2016 sampling event to comply with Rule 62-701.510(8)(a), F.A.C., however it is requested that submittal of the summary report be expedited.

It is also noted that the reports of results submitted for the August 2014, February 2015, and August 2015 sampling events identified elevated concentrations of Total Dissolved Solids (TDS) were contained in the samples collected from well TH-71A. In the event that the results of the February 2016 sampling event continue to indicate elevated TDS concentrations in the sample collected from well TH-71A, please include an evaluation of the source of changes to ground water quality in the area downgradient from the Section 9 disposal footprint and the need to implement corrective actions in the report that transmits the results of this sampling event.

The Department appreciates the County's efforts to coordinate and provide timely notice regarding this matter. We are available to provide assistance as needed. Please contact me if you would like to schedule a conference call or meeting.

Sincerely,

John



John R. Morris, P.G.

Permitting and Waste Cleanup Program
Florida Department of Environmental Protection, Southwest District
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Permitting Consistency Initiative: The Florida Department of Environmental Protection is committed to providing efficient, consistent and quality service to the citizens of Florida. In keeping with these objectives, we are pleased to announce ongoing improvements to our permitting process by standardizing and simplifying our documents. During the fall of this year, the Department will begin issuing permitting correspondence formatted consistently throughout all programs. Although the document formatting will look different

from past correspondence, please be assured that the content continues to be driven by applicable Rule and Statute. As always, if you have any questions, please contact your local DEP District office.

From: Adams, David [mailto:AdamsDS@HillsboroughCounty.ORG]

Sent: Thursday, April 21, 2016 2:41 PM

To: Morris, John R. < John.R. Morris@dep.state.fl.us>

Cc: Byer, Kimberly <ByerK@hillsboroughcounty.org>; Greenwell, Jeffry <GreenwellJ@hillsboroughcounty.org>; Ruiz, Larry

<RuizLE@HillsboroughCounty.ORG>; Townsel, Michael <TownselM@HillsboroughCounty.ORG>; Fuller, Josh

<FullerJ@hillsboroughcounty.org>; Pelley, Cindy <PelleyCA@HillsboroughCounty.ORG>

Subject: Required written notice to FDEP regarding TH-67

Dear Mr. Morris,

As we discussed on April 15, 2016 and yesterday April 20, 2016, the monitoring well TH-67 at the Southeast County Landfill is exhibiting water quality changes that are concerning. As shown on the attached spreadsheet, these changes include elevated values for conductivity, TDS, chloride and sodium, and the changes began to be seen in August 2015, but remained within applicable standards. The water quality observed in TH-67 within the results from the February semi-annul sampling event exhibited a sharp increase in concentrations and exceedances of standards for these parameters. Based on the February results, the County re-sampled TH-67 on April 5, 2016, to confirm the February results. The analytical results from the resampling exhibited higher values for conductivity, TDS, chloride, and sodium. On April 15, 2016, we returned to the site, set up on TH-67 to sample for conductivity only, and the value, which was recorded at 4463 uhmos/cm, appears to be increasing over time. While the well was being pumped and sampled, I walked up to the top and all around the landfill in the area of TH-67, and thoroughly searched a wide area for evidence of subsidence, stressed vegetation, or signs of leachate potentially seeping out of the side slope of the landfill. As shown on the attached photos, the entire area looked very well maintained and no indication of sub surface settlement, stressed vegetation, or seepage was observed. We also set up on an inactive monitoring well, TH-20B, which is approximately 400 feet southwest of TH-67. The conductivity recorded in TH-20B was 370 uhmos/cm. Since the wells closest to TH-67 are not showing any indication of impacts (TH-66 in February and TH-20B in April), the County believes that the impacts to TH-67 are limited in extent.

At this time, we do not definitively know the source of these water quality changes, but we continue to conduct an investigation to determine the source and develop our plan to address it. We are scheduling in a supplemental sampling event in May 2016, and we will sample TH-67, TH-66, TH-38B*, and TH-20B*, and the samples collected will be analyzed for the permit required parameters, as described in Appendix 3, Water Quality Monitoring Plan, Section II-3. We will keep you informed along the way, and, based on the results of the May 2016 sampling event, further discussions will likely be warranted.

Should you have any questions or require any additional information, please feel free to call me at (813) 663-3221.

Respectfully,

David S. Adams, P.G.
Environmental Manager
Public Utilities Department - BSOC
Hillsborough County BOCC
phone: 813-663-3221

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