

1050 Crown Pointe Pkwy, Ste 550, Atlanta, GA 30338

January 29, 2017

Mr. F. Thomas Lubozynski, P.E. Waste Program Administrator Solid and Hazardous Waste Program Florida Department of Environmental Protection, Central District 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767

Re: 25th Semi-Annual Water Quality Monitoring Event - Notice of Exceedances

J.E.D. Solid Waste Management Facility (JED Facility)

Omni Waste of Osceola County, LLC

Permit No. SO49-0199726-022 WACS Facility ID: 89544

Dear Mr. Lubozynski:

The purpose of this letter is to inform the Florida Department of Environmental Protection (FDEP) that monitoring parameters exceeded the Department's water quality standards in some of the groundwater monitoring wells at the JED Facility during the 25th semi-annual water quality monitoring event performed in November 2016. In accordance with 62-701.510(6)(a), Florida Administrative Code (F.A.C.), the Department is being notified of these findings within 14 days of receipt of the analytical laboratory results (the final lab report received via email on January 16, 2017). A brief summary of the exceeded monitoring parameters is presented below and results provided on the attached Table.

Ammonia - ammonia was reported above the groundwater cleanup target level (GCTL) of 2.8 mg/L in twelve (12) of the shallow groundwater monitoring wells (i.e., MW-1A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 11A, 16AR and 22AR) and six (6) of the intermediate monitoring wells (MW-1B, 3B, 4B, 5B, 7B and 10B). Ammonia has been detected in most of these wells during previous sampling events. Based on this historical data, these wells will not be re-sampled for ammonia and the reported concentrations will be considered as representing current conditions.

Benzene — benzene was reported above the GCTL of $1\mu g/L$ in six (6) of the shallow groundwater monitoring wells (MW-6A, 8A, 10A, 11A, 12A and 13A) and one (1) of the intermediate wells (MW-10B). Benzene has been detected above the GCTL in most of these wells during previous monitoring events at similar concentrations. Based on this historical data,

these wells will not be re-sampled and the reported concentrations will be considered as representing current conditions.

 $\underline{1,2\text{-Dibromo-3-chloropropane}}-1,2\text{-Dibromo-3-chloropropane}$ was reported above the GCTL of 0.2 $\mu g/L$ in monitoring well MW-22AR (2.9 $\mu g/L$). This parameter has not been detected in site wells previously and may be anomalous. MW-22AR will not be re-sampled for this constituent.

<u>Chloride</u> – chloride was reported above the GCTL of 250 mg/L in monitoring well MW-1A (530 mg/L) and MW-16AR (420 mg/L). These wells will not be re-sampled for chloride and the reported concentration will be considered as representing current conditions.

<u>Iron</u> –iron was detected above the GCTL of 300 μ g/L in nineteen (19) of the shallow monitoring wells (MW-1A through 13A, 16AR, 25A, 27A, 28A, 29A and 31A) and twenty (20) of the intermediate monitoring wells (MW-1B, 2B, 3B, 6B through 13B, 16BR, 17BR, 22BR, 23B, 24B, 25B, 27B, 28B, 29B and 31B). The concentrations ranged from 430 μ g/L to 40,000 μ g/L. The concentrations are consistent with previous results and will not be re-sampled and the reported concentrations will be considered as representing current conditions.

<u>Lead</u> – lead was reported above the GCTL of 15 μ g/L in monitoring well MW-31B (100 μ g/L). MW-31B had a lead concentration of 130 mg/L during the baseline sampling event and as described in the MW-31 cluster baseline sampling report (Weibu, LLC, October 2016) may likely be due to the high turbidity levels in the sample. High turbidity in intermediate and deep monitoring wells installed at the site, despite extended well development and removal of multiple well volumes, is well documented. MW-31B will not be re-sampled for lead.

<u>Sodium</u> – sodium was reported above the GCTL of 160 mg/L in monitoring well MW-1A (280 mg/L) and MW-16AR (240 mg/L). These wells will not be re-sampled for sodium and the reported concentration will be considered as representing current conditions.

<u>Vanadium</u> – Vanadium was reported above the GCTL of 49 μ g/L in monitoring well MW-31B (130 μ g/L). MW-31B had a vanadium concentration of 211 μ g/L during the baseline sampling event and may likely be due to the high turbidity levels in the sample. MW-31B will not be re-sampled for vanadium.

<u>Total dissolved solids (TDS)</u> – TDS concentrations were reported above the GCTL of 500 mg/L in seven (7) shallow groundwater monitoring wells (MW-1A, 2A, 3A, 4A, 8A, 16AR and 22AR) and ten (10) intermediate monitoring wells (MW-1B, 2B, 3B, 4B, 5B, 7B, 8B, 10B,

23B, and 31B). The reported concentrations will be considered as representing current conditions.

If you have any questions or need additional information, please contact the undersigned at (813) 943-8633 or by email <u>jterry@envplanning.com</u>.

Sincerely,

Joe Terry

Project Engineer

EPS

cc: K. Wills, WCI

B. Gray, WCI

A. Rainey, FDEP

G. DePradine, FDEP

Table 3

SUMMARY OF GROUNDWATER ANALYTICAL DATA 25th SEMI-ANNUAL WATER QUALITY MONITORING EVENT J.E.D. SOLID WASTE MANAGEMENT FACILITY

Well ID	1,2-Dibromo-3-chloropropane	Acetone	Benzene	Chloroethane	Toluene	Antimony	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Iron	Lead	Nickel	Mercury	Sodium	Selenium	Silver	Thallium	Vanadium			Chloride		Nitrate (N)
	PDWS (ug/L)	GCTL (ug/L)	PDWS (ug/L)	GCTL (ug/L)	SDWS (ug/L)	PDWS (ug/L)		PDWS (ug/L)	PDWS (ug/L)		PDWS (ug/L)					GCTL (ug/L)	PDWS (mg/L)) PDWS (ug/L)	SDWS (ug/L)	PDWS (ug/L)				SDWS (mg/L) S		SDWS (mg/L)
	0.2	6,300	1	12	40	6	2,000	4	5	100	140	1,000	300	15	100	2	160	50	100	2	49	5,000	2.8	250	500	10
MW-1A	0.11	3.70	I 0.16 U	0.33 U	J 0.23	U 0.11 I	68.00	0.14	0.32 L	4.00	1.80	I 2.50 L	10,000.00		U 1.40	I 0.01 U	280.00	6.80 U		U 0.06 L	21.00	8.40	7.40	530.00	1,200.00	
MW-1B	0.11	2.20	I 0.16 U	0.33 U	J 0.23	U 0.21 I	73.00	0.72	0.32 L	1.50	10.00	2.50 L	32,000.00	1.30	U 4.80	I 0.01 U	130.00	6.80 U	0.44 I	U 0.08	11.00	2.00 U	3.80	240.00	1,200.00	0.25 U
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MW-2A MW-2B	0.11 I	2.30	U 0.16 U	0.33 U	U 0.23 U 0.23	U 0.05 U	65.00	0.23	0.34 0.32 L	2.70	3.70	1 2.50 L 2.50 L	9,300.00 40.000.00	1.30	U 2.80 U 4.20	I 0.01 U	58.00 58.00	6.80 U		U 0.06 L	4.80	2.00 U	2.70	120.00	860.00	0.25 U
mir LD		2.10	0 0.10 0	0.55	0.23	0.00	03.00	0.00	0.02	0.00	1000	2.50	40,000.00	1.50	4.20	0.01	50.00	0.00	0.44	0.00	7.70	2.00	1.00	110.00	000.00	0.25
MW-3A	0.11	2.10	U 0.16 U	0.33 L	J 0.23	U 0.05 U	98.00	0.13 U	0.33	3.40	1.40	I 2.50 L	12,000.00	1.30	U 1.10	U 0.01 U	19.00	6.80 U	0.44 I	U 0.06 L	4.90	4.60	17.00	8.30	1,300.00	0.25 U
MW-3B	0.11	3.30	I 0.16 U	0.33 U	J 0.23	U 0.05 U	48.00	1.60	0.39	1.40	7.10	2.50 L	23,000.00	1.30	U 1.10	U 0.01 U	22.00	6.80 U	0.44 I	U 0.08	3.60	2.00 U	4.90	46.00	1,500.00	0.25 U
MW-4A	0.11	0.00		0.00			100.00	0.40			0.70		10.000.00				05.00	0.00 11				0.00	7.00	10.00	1 000 00	0.05
MW-4A MW-4B	0.11	3.10	I 0.16 U	0.33 U	U 0.23 U 0.23	U 0.05 U	38.00	0.13 U	0.44	2.20	0.60	I 2.50 L	250.00	1.30	U 1.10	U 0.01 U	35.00 71.00	6.80 U 6.80 U	0.44 I	U 0.06 L	7.70	6.80	8.90	110.00	1,200.00	0.25 U 0.50 U
					-										-	-									1,000.00	
MW-5A	0.11	5.00	I 0.16 U	0.33 l	J 0.23	U 0.12 I	20.00	0.13 U	0.32 l	3.70	0.60	U 2.90	880.00	1.30	U 1.10	U 0.02 I	22.00	6.80 U	0.44 I	U 0.06 L	2.20	14.00	6.40	23.00	280.00	0.25 U
MW-5B	0.11	2.70	I 0.16 U	0.33 l	J 0.23	U 0.13 I	46.00	0.35	0.50	2.20	0.60	U 2.50 L	290.00	1.30	U 1.10	U 0.01 U	83.00	6.80 U	0.44 I	U 0.06 L	4.20	8.00	5.10	96.00	1,600.00	0.50 U
MW-6A	0.11	200	5.70	0.33 L	U 0.23	0.00	6.90	0.13 U	0.32 L	2.00	0.60	U 2.50 L	7.900.00	1.30	U 1.10	U 0.01 U	25.00	6.80 U	0.44 I	U 0.06 L	E 600	E 00 1	2.00	21.00	220.00	0.25 U
MW-6B	0.11	2.10	U 0.16 U	0.33 L		U 0.05 U	49.00	0.13	0.32 L	2.60 1.20	0.60	U 2.50 U	1,400.00	1.30	U 1.10	U 0.01 U	9.90	6.80 U		U 0.06 L	1.60	9.70	0.27	28.00	230.00 75.00	0.25 U
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MW-7A	0.11	2.10	U 0.16 U	0.33 U	J 0.23	U 0.05 U	12.00	0.13 U	0.32 L	2.20	0.63	I 2.50 L	8,500.00		U 1.10	U 0.01 U	14.00	6.80 U	0.44 I	U 0.06 L	2.60	6.80	8.10	24.00	110.00	0.25 U
MW-7B	0.11	2.10	U 0.16 U	0.33 U	J 0.23	U 0.06 I	28.00	1.30	0.32 L	1.30	4.90	2.50 L	29,000.00	1.30	U 3.60	I 0.01 U	25.00	6.80 U	0.44 I	U 0.09	3.30	2.00 U	3.30	2.50 U	680.00	0.25 U
MW-8A	0.11	2.10	U 4.90	0.33 L	U 0.23	0.15	45.00	0.32	0.75	2.20	3.20	I 2.50 L	14,000.00	1.30	U 4.00	I 0.01 U	8.60	6.80 U	1.20	I 0.06 L	4.70	6.20	5.40	7.50	1.400.00	0.05 U
MW-8B	0.11	2.10	U 0.16 U	0.33 L	J 0.23	U 0.08 I	72.00	0.72	0.51	0.84	6.50	2.50 t	38,000.00	1.30	U 5.80	I 0.01 U	39.00	12.00 I	2.20	0.06	6.10	2.00 U	0.84	47.00	800.00	0.05 U
MW-9A	0.11	2.10	U 7.60	0.33 U	U 0.23	U 0.05 I	27.00	0.18	0.32 L	0.89	0.60	U 3.50 I	1,200.00	1.30	U 1.10	U 0.01 U	20.00	6.80 U	2.10	I 0.06 L	2.90	6.60	4.70	11.00	230.00	0.16
MW-9B	0.11	2.10	U 0.16 U	0.33 U	J 0.23	U 0.05 I	38.00	1.10	0.32 L	1.90	3.80	I 2.50 L	14,000.00	1.30	U 1.50	I 0.01 U	24.00	6.80 U	1.90	0.06	4.90	5.50	1.20	53.00	440.00	0.05 U
MW-10A	0.11	2.10	U 3.50	0.33 L	J 0.23	U 0.05 U	59.00	0.24	0.32 L	0.69	1.40	2.00	2,500.00	1.30	1.20	I 0.01 U	34.00	6.80 U	2.50	I 0.06 L	2.00	10.00	6.00	22.00	270.00	0.05 U
MW-10B	0.11	2.10	U 5.60	0.33 L	0.23	U 0.05 I	44.00	1.80	0.46	1.10	5.20	2.50 L	J 8,500.00	1.30	U 1.10	U 0.01 U	30.00	6.80 U	2.10	1 0.06	4.90	6.60	5.80	31.00	700.00	0.05 U
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MW-11A	0.11	2.10	U 6.20	0.33 U	U 0.23	U 0.14 I	56.00	0.32	0.32	0.99	0.60	U 3.90 I	1,400.00	1.30	U 1.10	U 0.01 U	8.30	6.80 U	2.20	I 0.06 L	4.30	7.70	4.20	7.70	220.00	0.05 U
MW-11B	0.11	2.10	U 0.16 U	0.33 L	U 0.23	U 0.06 I	13.00	0.16	0.32 L	1.70	0.60	U 2.70 I	280.00	1.30	U 1.10	U 0.01 U	13.00	14.00 I	2.20	I 0.06 L	3.80	9.00	0.07	10.00	58.00	0.05 U
MW-12A	0.11	2.10	U 7.00	0.33	J 0.23	0.11	26.00	0.23	0.32 L	0.84	1.10	I 2.50 L	2,400.00	1.30	U 2.40	I 0.01 U	17.00	9.30	1.70	I 0.06 L	3.30	7.10 I	1.10	35.00	110.00	0.05 U
MW-12B	0.11	2.10	U 0.16 U	0.33 L	J 0.23	U 0.05 U	23.00	0.14	0.32 L	0.50	J 0.60	U 2.50 L	750.00	1.30	U 1.10	U 0.01 U	8.70	9.50	1.70	I 0.06 L	2.30	13.00	0.11	15.00	57.00	0.05 U
MW-13A MW-13B	0.11 I	2.10	U 3.90 U 0.16 U	0.33 U	U 0.23 U 0.23	U 0.05 U	72.00	0.19	0.32 L	1.30	0.60 I 0.60	U 2.50 L	1,200,00		U 1.10	U 0.01 U	64.00 13.00	6.80 U	1.80	I 0.06 L	5.00	10.00	1.70	140.00	380.00	0.05 U
MW-13B	0.11	2.10	U 0.16 U	0.33	0.23	0.05	17.00	0.15	U.32 L	0.54	0.60	U 2.50 L	1,200.00	1.30	0 1.10	0.01 0	13.00	6.80 U	1.70	1 0.06 0	1.70	11.00	0.16	24.00	70.00	0.05
MW-16AR	0.11	2.10	U 0.16 U	0.33 L	0.25	1.70	130.00	0.14	4.40	2.70	0.60	U 2.50 L	710.00	1.30	U 1.10	U 0.01 U	240.00	6.80 U	0.44 I	U 0.08	12.00	8.80	3.90	420.00	2,000.00	51.00
MW-16BR	0.11	2.10	U 0.16 U	0.33 L	0.29	I 0.05 U	19.00	0.13 U	0.32 l	1.10	0.60	U 2.50 L	1,300.00	1.30	U 1.10	U 0.01 U	7.30	6.80 U	0.44 I	U 0.06 L	0.74	2.00 U	0.23	15.00	84.00	0.14 I
				·							<u> </u>				<u> </u>											
MW-17AR MW-17BR	0.11 I	2.10	U 0.16 U	0.33 U	U 0.23 U 0.23	U 0.44 I	150.00	0.31	1.80 0.32 L	1.30	0.60	U 2.50 L	260.00 J 850.00	1.30	U 1.10	U 0.01 U	15.00	6.80 U 6.80 U	0.44 I	U 0.06 L	8.70	2.00 U	0.28	100.00	260.00	17.00 Q 0.05 U,Q
MAT TABLE		2.10	0 0.10 0	0.55	0.23	0.00	10.00	0.10	0.02	1.00	0.00	0 2.50 (030.00	1.50	1.10	9 001 0	20.00	0.00	0.44	0.00	1.50	0.20	0.14	55.60	110.00	0.00 0,0
MW-22AR	2.90	6.40	0.16 U	0.33 U	J 0.25	0.16	44.00	0.13 U	0.49	2.90	0.60	U 2.50 L	35.00	1.30	U 1.10	U 0.01 U	13.00	6.80 U	1.40	I 0.06 L	4.70	8.60	4.50	14.00	820.00	0.31 I,Q
MW-22BR	0.11	2.10	U 0.16 U	0.33 L	J 0.23	U 0.11 I	15.00	0.19	0.32 L	0.50	0.60	U 2.50 L	1,800.00	1.30	U 1.10	U 0.01 U	15.00	6.80 U	1.90	I 0.06 L	2.10	4.80	0.13	27.00	96.00	0.15 I,Q
MW-23A							45.00		0.32 L		0.00		00.00	1.30			00.00		0.40		0.00	5.00	0.70	07.00	070.00	0.00
MW-23A MW-23B	0.11 U	2.10 J 2.10	U 0.16 U	0.33 U	U 0.23 U 0.23	U 0.10 I	92.00	0.13 U	0.32 L	1.50	0.60	U 2.50 L	2.100.00	1.30	U 1.10	U 0.01 U	20.00	6.80 U	2.10 1.80	I 0.06 L	2.80	7.20	2.20	220.00	600.00	0.28 I,Q 0.13 I,Q
MW-250		2.10	0, 0.10 0	0.35	0.20	0.10	32.00	0.00	0.02	1.20	0.00	0 2.50 0	2,100.00	1.00	1.10	9 00. 0	100.00	0.00	1.00	0.00	0.70	7.20	2.20	220.00	000.00	0.10
MW-24A	0.11		U 0.16 U	0.33 U	J 0.23	U 0.11 I	5.00	0.13 U		1.20	0.60	U 2.50 L			U 1.10		6.70	6.80 U	1.60	I 0.06 L	1.70	11.00	0.06	11.00	70.00	0.13 I,Q
MW-24B	0.11 I	2.10	U 0.16 U	0.33 L	J 0.41	0.07	9.90	0.13 U	0.32 L	1.60	0.60	U 2.50 L	440.00	1.30	U 1.10	U 0.01 U	4.60	6.80 U	1.10	I 0.06 L	2.50	10.00	0.08	6.40	100.00	0.13 I,Q
MW-25A	0.11	2.10	U 0.16 U	0.33 L	0.23	U 0.05 U	160.00	0.05	0.32 L	1.60	2.20	I 2.50 L	16,000.00	1.30	U 1.10	U 0.01 U	53.00	7.00	0.44	U 0.06 L	4.70	2.00 U	1.00	75.00	440.00	0.14
MW-258	0.11	2.10	U 0.16 U	0.33 L	J 0.23	U 0.11 I	75.00	0.32	0.32 L	7.10	0.60	U 2.50 U	1,300.00	1.90	1.10	I 0.01 I	12.00	6.80 U	0.44	U 0.06 L	11.00	3.70	0.17	22.00	100.00	1.40
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MW-27A	0.11	2.10	U 0.16 U	0.33 L	J 0.23	U 0.18 I	10.00	0.13 U	0.32 L	2.10	0.60	U 2.50 L	430.00	1.30	U 1.10	U 0.01 U	9.70	8.20	0.54	I 0.06 L	4.80	6.40	0.32	7.70	80.00	0.16 I
MW-27B	0.11	2.10	U 0.16 U	0.33 L	U 0.23	U 0.15 I	55.00	0.26	0.32 L	6.20	0.60	U 2.80	1,100.00	4.20	1.10	U 0.02 I	27.00	8.70	0.53	I 0.06 L	9.00	11.00	0.04	37.00	140.00	0.14
MW-28A	0.11	2.10	U 0.16 U	1.80	0.23	U 0.05 I	5.10	0.13 U	0.32 L	3.00	0.60	U 2.50 L	980.00	1.30	ul 1.10	U 0.01 U	5.80	6.80 U	0.60	I 0.06 L	1.70	13.00	1.40	6.00	80.00	0.50 U
MW-28B	0.11	2.10	U 0.16 U	0.33 L	0.26	1 0.05 1	32.00	0.13 U	0.32 L	1.80	0.60	U 2.50 U	1,200.00	1.30	U 1.10	U 0.01 U	15.00	6.80 U	0.44	U 0.06 L	2.50	4.00	0.09	6.50	98.00	0.50 U
MW-29A	0.11	2.10	U 0.16 U	0.33 L	U 0.23	U 0.97	35.00	0.13	1.30	1.40	0.74	1 2.50 L	1,400.00	1.30	U 1.10	U 0.01 U	12.00	6.80 U	0.44 I	U 0.48	24.00	5.90	0.34	7.30	100.00	1.60 Q
MW-29B	0.11	2.10	U 0.16 U	0.33 L	0.23	U 0.05 I	99.00	0.29	0.32 L	1.70	0.62	l 2.50 l	3,500.00	1.30	U 1.10	U 0.01 U	25.00	6.80 U	0.44 I	U 0.06 L	3.30	7.20	0.10	30.00	200.00	0.05 U,C
MW-31A	0.11	2.10	U 0.16 U	0.33	0.23	0.12	20.00	0.49	0.32 L	100	1.60	1 2.50 L	5.700.00	1.30	1.70	I 0.01 U	18.00	6.80 U	0.58	I 0.06 L	3.10	2.00 U	1.10	27.00	250.00	0.13 I.Q
MW-31A MW-31B	0.11	2.10	U 0.16 U	0.33 L	J 4.60	0.43	560.00	3.50	1.80	77.00	2.40	19.00	5,200.00	100.00	13.00	1.10	15.00	29.00	0.44	U 0.26	130.00	8.30	0.32	26.00	1,300.00	2.50 U,C
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NOTES:

The Reported Value is between the Laboratory Method Detection Limit (MDL) and the Laboratory Practical Quantitation Limit (PQL).

Detect
Exceeds GCTL

Exceeds GCTL

U Sample was analyzed for but not detected.

Q Missed hold time.(see lab narrative)