FLORIDA DEPARTMENT OF
Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD, SUITE 232
ORLANDO FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

February 12, 2020

Mr. Kirk Willis
Southern Region Engineer
Waste Connections of Osceola County, LLC
1501 Omni Way
St. Cloud, Florida 34773
Kirk.Willis@wasteconnections.com

Osceola County – Solid Waste
J.E.D. Solid Waste Management Facility
St. Cloud, Florida
WACS ID: 89544
Review of 31st Semi-Annual Water Quality Monitoring Report

Dear Mr. Willis:

The Department has reviewed the "**31st Semi-Annual Water Quality Monitoring Report**", which was dated February 11, 2020 and submitted on February 12, 2020 for the **J.E.D. Landfill – (Solid Waste Management Facility) - WACS Facility ID: 89544 – Osceola County**. The Report was submitted by Geosyntec Consultants. The report is 788 pages long, and the EDD files were included in the submittal. We find the report acceptable. The last permit modification for this facility is dated April 10, 2019, and the facility is compliant with the Monitoring Plan Implementation Schedule (MPIS) attached to that permit modification.

A total of 50 groundwater monitoring wells were utilized to monitor the groundwater at the **J.E.D. Landfill** facility during the November 2019 event. No exceedances of state surface water standards or criteria were reported. Review of the data provided indicates that 6 parameters were detected at concentrations exceeding their respective Florida regulatory limits or criteria for groundwater. This includes Arsenic, Sodium, Chloride, Iron, Benzene, and Total Dissolved Solids. This data is summarized in Section 4.2 and Table 3 of the Report. The analytes of concern and/or exceedances of the respective Primary Drinking Water Standards (PDWS) (62-550 Florida Administrative Code (F.A.C.)), Secondary Drinking Water Standards (SDWS) (62-550 FAC), or Florida Groundwater Cleanup Target Levels (GCTLs) (62-777 F.A.C.) detected during this period include:

Arsenic - This analyte was detected in compliance wells CW-1A (150 micrograms per liter (µg/L)) and CW-3A (13 µg/L) during this period above the GCTL of 10 micrograms per liter (µg/L). Arsenic has historically exceeded the GCTL in CW-1A. Both wells are located within the perimeter of the facility. We will continue to monitor these concentrations.

Sodium – This analyte was detected in MW-1A, MW-12A, MW-13A, MW-23A, MW-23B, CW-2A and CW-3A during this period above the PDWS/GCTL of 160,000 µg/L. All of these wells are located within the perimeter of the facility. We will continue to monitor these concentrations.

Chloride – This analyte was detected in MW-1A, MW-2B, MW-4B, MW-5B, MW-9B, MW-12A, MW-13A, MW-13B, MW-23A, MW-28A, CW-2A, and CW-3A during this period above the SDWS/GCTL of 250,000 µg/L. All of these wells are located within the perimeter of the facility. We will continue to monitor these concentrations.

Iron – This analyte was detected above the SDWS/GCTL of 300 µg/L in all monitoring wells sampled during this event except for MW-4B and MW-5B. The highest A-Zone and B-zone iron concentrations were from MW-31A and MW-31B. This matches the previous sampling event. Historical analytical data indicates Iron has exceeded the SDWS in most wells during all of the groundwater monitoring events, including the baseline events. All of these wells are within the perimeter of the facility. We will continue to monitor these concentrations.

Benzene– This analyte was detected above the PDWS/GCTL of 1.0 µg/L in 8 of the A – Zone wells, and one B-zone well, with the highest concentration from MW-10B at 13 µg/L. The source of the benzene has been attributed to landfill gas (HDR Engineering, Inc. 2012, Geosyntec, 2013 and 2017). All of the wells that had detections of benzene are within the perimeter of the landfill. No additional action is warranted at this time. We will continue to monitor these concentrations.

1,2,3 – Trichloropropane – The laboratory method detection limit (MDL) was reported greater than the GCTL for this analyte of 0.02 µg/L for all sampled monitoring and compliance well samples. Please make all efforts to obtain a MDL that may be at or less than the GCTL. We will continue to monitor these concentrations.

Acrylonitrile – The laboratory method detection limit (MDL) was reported greater than the GCTL for this analyte of 0.06 µg/L for all sampled monitoring and compliance well samples. Please make all efforts to obtain a MDL that may be at or less than the GCTL. We will continue to monitor these concentrations.

It is noted an exposed geomembrane cover was installed over approximately 6.5 acres of the lower third of the east facing slope and completed on January 30, 2020 to further attenuate leachate indicator parameters.

Please perform the next semiannual groundwater sampling event in **May 2020.** Please notify the Department at DEP_CD@dep.state.fl.us at least **fourteen (14) days** prior to the installation and/or sampling of any monitoring well. [62-701.510(9)(a), Florida Administrative Code (F.A.C.). Please also copy me at Dale.Melton@dep.state.fl.us for field activity notifications and correspondence.

The monitoring report (including ADaPT EDDs) should be emailed to Tallahassee using the following email address: ADaPT.EDDs.and.Reports@dep.state.fl.us. Please copy me on the email. Additionally, if attachments are too large to email, monitoring reports may also be transmitted to the FDEP Solid Waste program in Tallahassee using the following FTP site: ftp://ftp.dep.state.f;.us/pub/WACS-ADaPT/EDDS_and_Reports. Please email us at ADaPT.EDDs.and.Reports@dep.state.fl.us informing us of what files were transmitted via FTP for which facility sampling event.

Please submit the next **MPIS Technical Report by March 31, 2022**. This Technical Report should cover the five (5) semiannual sampling events for the November 2019 through November 2021 monitoring period. If you have any questions concerning this correspondence, please contact me by telephone at (407) 897-4326, or by email at Dale.Melton@dep.state.fl.us. Please include the **WACS Facility ID: 89544** on all reports and correspondence**.**

Sincerely,

Dale E. Melton

Dale Melton
Environmental Consultant
Permitting and Waste Cleanup Program

cc:
Craig Joseph, P.G., Geosyntec CJoseph@Geosyntec.com
Mathew Wissler, P.G., Geosyntec MWissler@Geosyntec.com
Benjamin Gray, Waste Connections Benjamin.Gray@WasteConnections.com
DEP: Dale Melton, Lu Burson, Nathan Hess, Erin Rasnake, El Kromhout, Ashley Gardner