



Florida Department of Environmental Protection

Northwest District
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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 7, 2008

Sent via email to:
vwilliams@emeraldwaste.com

Mr. Vic Williams
Landfill Manager
Post Office Box 168
Freeport, Florida 32429

Dear Mr. Williams:

The purpose of this letter is to notify you of the Department's review of your consultant's March 31, 2008 submittal of the First Quarter Evaluation Monitoring Report for your facility WRH West Bay, L.L.C. (DEP File No. 0161334-002-SO; Facility Identification No. 84449) located in Bay County.

Enclosed for your review is a copy of the Department's May 1, 2008 review memorandum prepared by Alex Webster, P.G. If you have any questions, please contact Charles Reyes, Solid Waste Section, by phone at (850) 595-8360, extension 1237 or by e-mail at carlos.reyes@dep.state.fl.us.

Sincerely,

Marshall S. Seymore, P. E.
Solid Waste Section Supervisor
Waste Management Program

MSS: cr

Enclosure: 05/01/08 Memorandum

cc: Peter Dohms, P.G., Gallet & Associates, pdohms@gallet.com
Thomas Dillard, DEP Panama City Branch Office, thomas.dillard@dep.state.fl.us
Bart Begley, Emerald Waste Services, bbegley@emeraldwaste.com
Bruce Emley, Emerald Waste Services, bemley@emeraldwaste.com

Memorandum

Florida Department of Environmental Protection

TO: Marshall Seymore, P.E. *MS* 2008-May-05

FROM: Alex Webster, P.G. *AW*

DATE: May 1, 2008

SUBJECT: First Quarter Evaluation Monitoring Report, February 2008
WRH West Bay C&D Debris Disposal Facility
Bay County, Florida
WACS ID No. NWD/03/00084449

I have reviewed the subject document prepared by Gallet & Associates on behalf of WRH West Bay, LLC, for the WRH West Bay C&D Debris Disposal Facility site. The First Quarter Evaluation Monitoring Report is dated and was received March 31, 2008. Evaluation Monitoring was requested based on the presence of Iron in compliance well MW-2R above the Ch. 62-550, F.A.C., secondary drinking water standards (SDWS).

The document reported concentrations above the SDWS for total and dissolved Iron in monitoring well MW-2R (1,651 µg/L and 1,200 µg/L respectively). Concentrations of total Iron in the background well, MW-1R, are 241 µg/L. The concentrations of Iron exceed the SDWS in MW-2R for the fifth consecutive sampling event. The consultant states "It should be noted that MW-2R is not downgradient of any disposed C&D debris(Figure 2). Also note that no other indicator parameters (e.g., TDS, sulfate, sodium, chloride, etc.) at MW-2R indicate that this well is affected by typical C&D debris ground water impacts." I am unable to concur with this statement. A review of historical topographic surveys submitted to the Department in 1997, 1999, and 2006 indicate otherwise. A comparison of the 1997 survey versus the 1999 survey indicates the appearance of two areas of excavation in Lot 64 due south of the current location of MW-2R. The larger excavation shown in 1999 appears to be approximately 14 feet below the land surface shown in the 1997 survey. The excavation appears to be approximately 300 feet across from north to south and approximately 450-500 feet across from east to west, sloping upwards for approximately an additional 100 feet. The 2006 survey submitted to the Department appears to show this area backfilled even to, or slightly above, the land surface elevations shown in 1997. Therefore, it appears that material of some type was placed in the area in question.

Unfiltered Aluminum samples were above the SDWS in wells MW-1R, MW-2R, MW-3R and MW-4R. Filtered (dissolved) Aluminum samples (allowed under current operations permit) were above the SDWS in wells MW-1R, MW-3R and MW-4R. Filtered (dissolved) Aluminum samples were above the SDWS in wells MW-1R, MW-3R and MW-4R. However, the dissolved Aluminum concentrations in the downgradient

wells MW-3R and MW-4R are less than or similar to the background well, MW-1R. Therefore, Aluminum concentrations do not appear to be of concern at this time.

The consultant states that the locations of all four wells are shown on Figure 2, that the approved boundaries of the zone of discharge (ZOD) are also shown on Figure 2, and that the ZOD boundaries are 100 feet from the edge of the current and anticipated debris boundaries. However, a review of Figure 2 indicates that it does not reflect the current site conditions and is not representative of the approved ZOD as shown in the current permit. The site map should be updated and locations of the monitoring wells confirmed based upon the most recent topographic and boundary survey.

The consultant made the following statements. "The following continuation of the ongoing evaluation monitoring plan is proposed. Background well MW-1R and compliance well MW-2R should continue to be tested quarterly for field parameters, plus the constituent of concern (total and dissolved iron). Because there is a well just down gradient of MW-2R located on the Steelfield Class III Landfill property, it is recommended that this well also be sampled quarterly for iron. Gallet will attempt to gain access to MW-24US prior to next quarterly sampling event scheduled to occur on April 23, 2008. If the analytical results indicate that MW-24US is not affected by elevated iron concentrations, it may be recommended that MW-2R be replaced. A soil boring should be advanced in the vicinity of MW-2R to locate an appropriate screen interval prior to abandoning MW-2R".

I am unable to concur with the recommendations. The consultant may report total and dissolved Iron to the Department. However, the consultant has not provided the required information necessary for the Department to consider the validity of the dissolved Iron data.

Furthermore, Rule 62-701.510(7)(3.) states "Within 90 days of initiating evaluation monitoring, the permittee shall install and sample compliance monitoring wells at the compliance line of the zone of discharge and downgradient from the affected detection monitoring wells. These wells shall be installed according to the requirements of paragraph (3)(d) of this section, and samples from these wells and the affected detection wells shall be analyzed quarterly for the parameters listed in paragraphs (8)(a) and (d) of this section". The consultant may or may not be able to gain access to well MW-24US, has not demonstrated that MW-24US is screened within the same zone of the aquifer as MW-2R, and has not provided information as to the distance between MW-24US and MW-2R. Therefore, MW-24US should not be considered to fulfill the requirements of the aforementioned Rule (i.e., acting as a downgradient well). A more suitable approach would be to install and sample the appropriate assessment wells. Additionally, it appears that the well screens for MW-2R, MW-3R and MW-4R were placed in such a manner that the screens have been exposed for most, if not all, of the groundwater sampling events. Any replacement wells installed for the site should be screened below the water table.

AW