



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Mr. Bradley S. Arnold,
County Administrator
Board of Sumter County Commissioners
910 North Main Street - RM 201
Bushnell, Fl. 33513

December 30, 2008

RE: Sumter County Transfer Station, Sumter County
Pending Permit No.: 126941-005-SO/31
WACS Id#: 53008

Dear Mr. Arnold:

This is to acknowledge receipt your permit application, dated October 31, 2008 (received October 31, 2008) and fee received December 2, 2008 to continue to operate and close a waste processing facility referred to as Sumter County Transfer Station, located at 835 CR 529, Lake Panasoffkee, Florida.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes. Your application for an operation permit is incomplete. This is the Department's first request for information. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

The following information is needed in support of the solid waste permit application [Chapter 62-701, Florida Administrative Code (F.A.C.)].

GENERAL:

1. The requested information and comments below do not repeat the information submitted by the applicant. However, every effort has been made to concisely refer to the section, page, drawing detail number, etc. where the information has been presented in the original submittal.
2. Please submit **4 copies** of all requested information. Please specify if revised information is intended to supplement, or replace, previously submitted information. Please submit all revised plans and reports as a complete package. For revisions to the narrative reports, deletions may be struckthrough (~~struckthrough~~) and additions may be shaded **shaded** or similar notation method may be used. This format

shaded ~~shaded~~ or similar notation method may be used. This format will expedite the review process. Please include the revision date on all revised pages.

3. Please provide a summary of all revisions to drawings, and indicate the revision on each of the applicable plan sheets. Please use a consistent numbering system for drawings. If new sheets must be added to the original plan set, please use the same numbering system with a prefix or suffix to indicate the sheet was an addition, e.g. Sheet 1A, 1B, P1-A, etc.

4. Please be advised that although some comments do not explicitly request additional information, the intent of all comments shall be to request revised calculations, narrative, technical specifications, QA documentation, plan sheets, clarification to the item, and/or other information as appropriate. **Please be reminded that all calculations, evaluations, etc., must be signed and sealed by the registered professional engineer (or geologist as appropriate) who prepared them.**

General Information, Rule 62-701.320 & 62-701.710 F.A.C.

1. **Engineering Report, Rule 62-701.320(7)(d)&(e) F.A.C.** Please provide a comprehensive revised Engineering Report and Operation Plan that includes the information requested. Please provide replacement pages with revisions noted (deletions may be struckthrough ~~struckthrough~~ and additions may be underlined underlined or a similar method may be used) and each page numbered with the document title and date of revision. This report will be reviewed in its entirety after responses are received.

Cover Page. Please provide a cover sheet for the engineering report stating the project title, location, applicant's name, engineer's name, address, signature, date of signature and seal.

Section 2 - Additional Information.

a. Item B.1. Please provide the full facility and owner name of the JED facility referred to in this section. Please provide calculations, including references and assumptions, supporting the waste projections referenced in Table 1. Please provide a summary of actual waste receipt information for the transfer station for the past 5 years to support the projected tonnages. Please provide calculations, including references and assumptions, to support the peak design capacity of 250 tons/day referenced. Please specify which waste types are accepted at the facility, and which types were considered in these calculations. Please provide information that is consistent with other sections of the application. **See also comment # 1.c. below.**

b. Item B.2. Please revise this section to refer to the plans by the numbering system with which they are labeled. Please provide information that demonstrates the facility will comply with all the prohibitions from Rule 62-701.300 F.A.C. For example, Item B.4 references a groundwater well on premises for firefighting. **See also comment #5 below.**

c. Item B.3. Please provide a list of equipment that includes the functions of the equipment. Please revise this list to include the leachate collection system pumps. Please specify if the facility is equipped with an on-site generator and if so, include it in the revised facility equipment list. Please include this information in the facility Operations Manual.

1) Please provide calculations, including references and assumptions, to support the peak design capacity of 320 tons/day referenced. Please provide information that is consistent. **See also comment #1.a. above.**

2) Please provide detailed and specific procedures for start up, and scheduled and unscheduled shut down operations. Please include this information in the facility Operations Manual. **See also comment #8. below.**

3) Please provide a figure showing the locations of fire extinguishers and evacuation routes for facility emergencies.

4) Please specify where the burning waste will be isolated. Please include this information in the facility Operations Manual. **See also comment #2.m. below.**

5) Please revise this section to be consistent with the current permit reporting requirement of one week post incident for submittal of the written incident report. Please include this information in the facility Operations Manual.

d. Item B.4. **See comment #3. below.**

e. Item B.7. Please provide information for how all waste types accepted at the facility will be managed in the event of an equipment breakdown. Please provide a plan for disposal of unmarketable recyclable materials and residue. Please include this information in the facility Operations Manual.

f. Item B.8. **See comment #4. related to Appendix B below.**

g. Item B.9. Please ensure that the information provided in this Item is included in the facility Operations Manual (Appendix F) of the application.

1) **Section 9.2** Please specify where the hazardous waste cabinet is located. Please revise this section to indicate that the batteries and hazardous waste will be removed every seven days or provide financial assurance. **See also comment #1.i. below.**

2) **Section 9.4** Please revise this section to comply with the Rule 62-701.710(4)(b)F.A.C. which requires all putrescible waste be processed within 48 hours of acceptance. Please revise the floor cleaning schedule to reflect this requirement. **See also comment #2.f below.** Please revise this section to indicate that the batteries and hazardous waste will be removed more frequently, or provide financial assurance. **See also comment #1.i. below.**

3) **Section 9.5** Please specify whether the procedures provided in this section apply to all portions of the facility. Clarify how unacceptable wastes will be managed differently in different areas of the facility. Specifically, clarify how unacceptable wastes will be reloaded into collection vehicles in the Class I area of the facility.

h. Item B.10. Please specify whether leachate will be disposed upon closure.

i. Item B.11. Since the Operation Plan and Contingency Plan indicate that some materials may be stored for as much as 30 days, the facility is not exempt from financial assurance requirements of Rule 62-701.630, F.A.C. Please provide cost estimates for the loading, hauling and disposal of the maximum quantity of processed and unprocessed materials, unacceptable and special wastes, recyclables, etc., that may be at the facility at any time. The estimates shall be for a third-party performing the work, shall include supporting quotes and shall be signed and sealed by a professional engineer.

2. **Operation Plan (Appendix F), Rules 62-701.320(7)(e), 62-701.710(2)(c)&(h) and 62-701.710(4), F.A.C.** Please provide a comprehensive Operations Plan that includes the following additional information and revisions. Please provide replacement pages with revisions noted (deletions may be struckthrough [~~struckthrough~~] and additions may be underlined [underlined] or a similar method may be used) and each page numbered with the document title and date of revision. The Operation Plan will be reviewed in its entirety after responses are received. **See also comment #1.g. above**

a. Section 1.2 Odor Control. Please specify whether the odor control system is in use. If it is in use, please provide a specific description and a detail drawing for this system. If it is not in use, please indicate that in the operation plan.

b. Section 1.3 Vector Control. Please define "vector control measures" as it is used in this section.

c. Section 1.7. Equipment Maintenance. Please provide details of onsite storage for used oil, lubricants, etc., including type of material, and location and type of containment. Please provide specific procedures for spill response and management of clean-up materials. Please provide procedures for the characterization and disposal of spent absorbent materials.

- d. Section 1.8 Leachate Collection and Disposal System. The leachate collection system piping and sumps were not designed to be used as leachate storage in addition to the collection tank. Please remove references to allowing leachate to accumulate in drains and piping from this section. Please revise this section to indicate that leachate will be removed from site when the storage tank is full. Please clarify that the leachate system will not be altered from the current permitted design prior to Department approval. Please include a schedule for cleaning the tipping floor and other leachate collection system components.
- e. Section 2.2 Employee Facilities. Please provide details of the lighting system. **See also comment #3. below.**
- f. Section 3.1.1 Class I Waste. Please define "other proper facility" as it is used in this section. Please specify that all putrescible waste will be processed within 48 hours of acceptance as pursuant to Rule 62-701.710(4)(b)F.A.C.
- g. Section 3.1.2 Source Separated Recyclables. Please provide the maximum storage quantity and time for each recyclable material. **See also comment #1.i. above.**
- h. Section 3.1.3 Special Waste. Please provide the maximum storage quantity and time, storage location and method for each special waste. Please specify that storage containers will be properly labeled. **See also comment #1.i. above.**
- i. Section 3.2 Unacceptable Waste. Please provide the maximum storage quantity and time and storage location and method for unacceptable waste. Please specify whether biomedical waste is considered unacceptable waste for this facility. **See also comment #1.i. above.**
- j. Section 3.4 Waste Quantity Records. Please provide scale records for the facility for the last 5 years to support the waste quantities referenced in the application. **See also comment #1.a. above.**
- k. Section 4.1 Citizens Drop-off Area. Please provide specific procedures for the processing of each special waste managed in this area. Please provide information regarding the "densifier used for bailing". Clarify what special wastes are baled. Please provide a manufacturer's cut sheet for this piece of equipment. Clarify how lawnmowers are drained of oil and gas and what type of storage is provided for removed gasoline. Clarify whether white goods are drained of refrigerant on-site.
- l. Section 4.2 Tipping Floor, Recyclable Material Baling... Please provide specific procedures for how each type recycled material will be processed. Sheet C-3 of the permit drawings references a "glass processing area" that is not mentioned in this narrative. Please specify where each recycled material will be processed.

- m. Section 6.1 Fires. Please specify the location of the isolated area used to unload burning waste. **See comment #1.c. above.**
- n. Section 6.2 Detection of Hazardous Materials. Please specify a maximum quantity and storage time for incidental hazardous waste pulled from incoming waste. **See also comment #1.i. above.**
3. **Plans and Drawings (Appendix A), Rules 62-701.320(7)(f), and 62-701.710(2)(b), F.A.C.** Please provide the following additional information and revisions to the plans.
- a. Sheet C-4. Please provide details for the leachate collection system floor drains, sumps, lift station, and storage tank. The line types used for the existent LCS piping do not distinguish the existing piping from piping proposed to connect the LCS to City sewer on this drawing. Please specify if these are proposed or "as built" conditions, and revise this sheet accordingly. Please be advised that construction of the leachate force main from the existent lift station requires a solid waste permit. Please provide details for the CDA. Please provide details of the lighting system referenced in Item B.4.
- b. Sheet C-3. **See comment #2.1. above.**
4. **Property Boundary and Legal Description (Appendix B). Rules 62-701.710(3)(g) F.A.C.** The information provided in this appendix does not appear to be complete. Please provide a boundary survey (signed and sealed by a surveyor), legal description, and topographic survey, of the facility which includes all portions of the property.
5. **Prohibitions, Rule 62-701.300, F.A.C.** Please provide information on how the facility will comply with the prohibitions listed in this section. **See comment #1.b. above.**
6. **History of Enforcement Rule 62-701.320 (7)(i), F.A.C.** Please provide a history and description of any enforcement actions relating to the applicant's solid waste management facilities in this state.
7. **Notice of Application, Rule 62-701.320(8), F.A.C.** Please provide proof of publication of the attached Notice of Application to the Department.
8. **Start up and Shut Down Operations, Rule 62-701.710(2)(c)(2) F.A.C.** Please provide detailed and specific procedures for start up operations, and scheduled and unscheduled shut down operations. This information should be provided in the operation plan. **See comment #1.c. above.**

9. **Airport Location Map. Rule 62-701.320(13), F.A.C.** Please provide documentation from the FAA that the waste processing facility does not violate FAA 150/5200-33B CA.

This staff assessment is preliminary and is designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the department and may be subject to revision pursuant to additional information and further review.

Please respond **by February 9, 2008**, responding to all of the information requests and indicating when a response to any unanswered questions will be submitted. If the response will require longer than **the date noted above**, you should develop an alternate specific time table for the submission of the requested information for Department review and consideration. Pursuant to the provisions of Rule 62-4.055(1), F.A.C., if the Department does not receive a timely, complete response to this request for information the Department may issue a final order denying your application. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant may reapply as soon as the requested information is available.

You are requested to submit 4 copies of your responses to this letter together, as one complete package. Please contact me at (813)632-7600 ext. 375 or nancy.gaskin@DEP.state.fl.us to schedule this meeting or if you have any questions.

Sincerely,



Nancy D. Gaskin
Solid Waste Program
Southwest District

ndg

attachment

cc (via email only):

Joe Miller, P.E., PBSJ, jlmiller@pbsj.com

Susan Pelz, P.E., FDEP Tampa

Fred Wick/Frank Hornbrook, FDEP Tallahassee

State of Florida
Department of Environmental Protection
Notice of Application

The Department announces the receipt of an application for permits from Board of Sumter County Commissioners, Bradley S. Arnold, County Administrator for the continued operation of a waste processing facility, subject to Department rules, located at 835 CR 529, Lake Panasoffkee, Florida, 33538.

This application is being processed and is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at the Department of Environmental Protection, Southwest District Office, 13051 N. Telecom Parkway, Temple Terrace, Fl. 33637-0926.