



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

Ms. Susan Metcalfe, P.G., Director
Citrus County Solid Waste Division
P.O. Box 340
Lecanto, Fl. 34460-0340

January 7, 2009

RE: Citrus County Central Class I Landfill
Interim Gas Collection and Control System
Pending Permit Modification No.: 21375-016-SO/MM to
Permit No. 21375-008-SO/01, Citrus County
WACS No.: SWD/09/39859

Dear Ms. Metcalfe:

This is to acknowledge receipt of the permit modification application prepared by SCS Engineers, dated and received December 9, 2008 for permit to construct and operate an interim gas collection and control system at an existing Class I landfill, referred to as the Citrus County Central Class I Landfill, located on S.R. 44, 3 miles east of Lecanto, Citrus County, Florida.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes.

Your application for a 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.

GENERAL:

1. The requested information and comments below do not necessarily 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. This format will expedite the review process. Please include 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 must be signed and sealed by the registered professional engineer (or geologist as appropriate) who prepared them.**

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

1. **Rule 62-701.320(7)(b), F.A.C. Application Form #62-701.900(1), Part A.4:** The WACS ID # for this facility is SWD/09/39859. Please revise this Part accordingly.

SECTION E - GENERAL REQUIREMENTS (Rule 62-701.320, F.A.C.):

2. **Section E.5:** Please verify the reference to a \$1,000 application fee and revise this section as applicable.
3. **Section E.13:** Please publish the attached Notice of Application and provide proof of publication to the Department.

Attachment E-1 - Gas Collection and Control System Construction Drawings (Rule 62-701.320(7)(f), F.A.C.)

Please provide revised drawings that address the comments provided below, including all necessary details for the construction and operation of the facility.

4. **Drawing 2 of 6:**

- a. Please verify the reference to Detail 1 on Sheet 4 for the condensate sump on this sheet and revise this sheet, as appropriate.

5. **Drawing 3 of 6:**

- a. **Detail 6:** Please explain how LCRS-15 will continue to function as a leachate cleanout, if needed, once the interim gas collection system is installed. Please revise the applicable part of the leachate management section of facility operation plan to include the revised procedures for use of LCRS-15 as a leachate collection system cleanout.

6. **Drawing 4 of 6:**

a. **Detail 2:**

- 1) This detail appears to indicate that part of the condensate sump will be installed below the water table. Please verify and revise this detail as appropriate. If the sump will be installed below the water table, please provide buoyancy calculations.

- 2) Please revise this detail to show the location and invert elevation of the condensate inlet pipe to the sump.

- b. **Detail 7:** Please verify the reference to a 6" HDPE flange lid in the profile view of this detail and revise the detail, as appropriate.

- c. **Detail 8:** Please verify the references to a 6" quick cap and a 4" HDPE riser pipe and vacuum break pipe in the profile view of this detail and revise the detail, as appropriate.

7. **Drawing 5 of 6:**

a. Details 1 & 2: Please explain how LCRS-16 and LCRS-17 will continue to function as a leachate cleanouts, if needed, once the interim gas collection system is installed. Please revise the applicable part of leachate management section of facility operation plan to include the revised procedures for the use of LCRS-16 and LCRS-17 as leachate system cleanouts.

8. **Drawing 6 of 6:**

a. Detail 1: Please explain how the condensate collected in the knockdown pot is removed and disposed and revise this detail, as appropriate to show any condensate outlet piping, if applicable.

b. Section A: Please revise this section to provide the invert elevation of the condensate drain line from the flare.

SECTION L - LANDFILL OPERATION REQUIREMENTS (RULE 62-701.500, F.A.C.):

9. **Section L.8.a:**

a. Please revise Section 8.2 of the facility operation plan to describe the revised leachate collection system maintenance procedures based on the changes to the leachate cleanouts.

b. Please either revise Section 8.2 or an applicable section of Section 9 of facility operation plan to include a description of condensate management from the gas collection and control system and the procedures for operation of the condensate removal system and sump.

10. **Section L.9.:**

a. Please revise Section 2.9.1 and an applicable section in Section 9 of facility operation plan to include a description of interim gas collection and control system and the operation and maintenance procedures for the system.

b. Please revise an applicable section in Section 9 of facility operation plan to reference Attachment L-1 of this application.

SECTION O - GAS MANAGEMENT SYSTEM (RULE 62-701.520, F.A.C.):

11. **Section O.4.c and Table O-1:** Please revise this section based on your response to comments on Attachment O-2 below, if applicable.

12. **Section O.4.d:** A reduction in condensate sampling frequency and/or a reduction in the parameter list will require a permit modification. **This comment is for information purposes only and does not require a response.**

13. **Attachment O-1:** Please provide a copy of the applicable sections of the supporting references for the assumed values for "k", "Lo" and "NMOC concentration in LFG".

14. **Attachment O-2:**

a. Landfill gas temperatures of 120°F have been assumed in condensate generation calculations provided to Department for other landfill gas system projects. Please provide the supporting reference for the assumption that the maximum temperature of landfill gas is 100°F. and/or revise these calculations accordingly.

b. It appears that the 6 extraction wells with 3 potential leachate dewatering pumps scenario presented in Attachment O-2 is not part of this application and therefore was not evaluated by the Department. **This comment is for informational purposes only and does not require a response.**

SECTION S - FINANCIAL RESPONSIBILITY (RULE 62-701.630, F.A.C.):

15. Section S.1 and Attachment S-1:

a. The additional long-term care cost estimates provided in Attachment S-1 (\$1,583.00) are approved. Please incorporate these costs into the revised long-term care cost estimates provided for the pending 7-Acre Re-closure application (Pending Application No. 21375-014-SF/01).

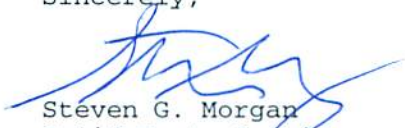
Please provide all responses that relate to engineering for design and operation, including plan sheets, signed and sealed by a professional engineer. Responses that relate to the facility operations should be included as part of the Operation Plan. All replacement pages should be numbered, and with revision date.

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 timetable 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 response to this letter as one complete package with an original and three copies of all correspondence. Please contact me at (813) 632-7600 ext. 385 should you have questions or points you wish to discuss.

Sincerely,


Steven G. Morgan
Solid Waste Section
Southwest District

SM/sgm

Attachment

cc: Carmen Bruno, carmen.bruno@bocc.citrus.fl.us
Dominique Bramlett, P.E., SCS Engineers, dbramlett@scsengineers.com
Patty Jefferson, Citrus County, patty.jefferson@bocc.citrus.fl.us
Frank Hornbrook, FDEP, Tallahassee (e-mail)
Susan Pelz, P.E., FDEP Tampa (e-mail)

62-110.106(5). Notices: General Requirements.

Each person who files an application for a Department permit or other notice as may publish or be required to publish a notice of application or other notice as set forth below in this section. Except as specifically provided otherwise in this paragraph, each person publishing such a notice under this section shall do so at his own expense in the legal advertisements section a newspaper of general circulation (i.e., one that meets the requirements of sections 50.011 and 50.031 of the Florida Statutes) in the county or counties in which the activity will take place or the effects of the Department's proposed action will occur, and shall provide proof of the publication to the Department within seven days of the publication.

62-110.106(6). If required, the notice shall be published by the applicant one time only within fourteen days after a complete application is filed and shall contain the name of the applicant, a brief description of the project and its location, the location of the application file, and the times when it is available for public inspection. The notice shall be prepared by the Department and shall comply with the following format:

**State of Florida
Department of Environmental Protection
Notice of Application**

The Department announces receipt of an application for permit from the Citrus County Solid Waste Division for a permit modification to construct and operate an interim landfill gas collection and control system, subject to Department rules, at the Citrus County Central Class I Landfill located on S.R. 44, 3 miles east of Lecanto, Citrus County, Florida.

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 North Telecom Parkway, Temple Terrace, Florida 33637-0926.