



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. Frank Coggins, Manager.
Sarasota Environmental Services
4000 Knights Trail Road
Nokomis, Fl. 34275

January 22, 2009

RE: Central County Solid Waste Disposal Complex Waste Processing
Facility, Sarasota County
Pending Permit No.: 134912-004-SO/31
WACS Id#: 51614

Dear Mr. Coggins:

This is to acknowledge receipt of your permit application, dated December 18, 2008 (received December 24, 2008) to construct, operate, and close a material recovery waste processing facility referred to as Sarasota Central County Solid Waste Disposal Complex WPF, located at 4000 Knights Trail Road, Nokomis, 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.

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 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.**

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

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.

a. 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

b. Additional information - Section 2.

1) **§ B.10 Closure Plan.** Please provide a copy of the closure cost estimates for this facility. Please provide documentation that the financial assurance for the facility has been approved. See also comment #2.k. below.

2) **§ B.12 Stormwater.** Please provide documentation (e.g., the cover page from the permit) verifying the permit numbers referenced in this section.

2. **Operation Plan (Section 3), 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.

a. §3.1.0 Process Flow Narrative.

1) Please demonstrate how the facility will comply with the prohibitions listed in Rule 62-701.300, F.A.C. See also comment #5. below.

2) Please define "reusable building materials" as shown on Figure 3-2, and revise the operations plan to include the management procedures for these materials.

3) The storage area capacities and removal rates listed on Table 3-1, referenced in this section, are not consistent with the capacities listed on Figure 3-2. Please ensure that the storage capacities listed in Table 3-1 and Figure 3-2, are consistent with the capacities referenced for the closure cost estimates for the WPF, and provide revised figures and tables as appropriate.

4) Please provide calculations, including references and assumptions, to support the storage capacities of the un-containerized storage areas referenced in Table 3-1 and shown on Figure 3-2, and the referenced 350 tons per day maximum operating rate.

b. §3.1.1 Concrete. Please define "adequate volume" as it is referenced in this section. Please provide information regarding air section permitting for the concrete crushing unit.

c. §3.1.2 Wood. Please define "recyclable wood" as it is referenced in this section. Please provide documentation that demonstrates that the facilities that may receive the "recyclable wood" that may be painted or treated are authorized to accept such materials for fuel. Please provide procedures for removing bags from the wood prior to processing. Please provide information regarding air section permitting for the wood grinding unit.

d. §3.1.3 Mixed Load. Please define "adequate amount" as it is referenced in this section. Please provide information regarding air section permitting regarding the grinding of roofing shingles. Please clarify at what point the unacceptable wastes are removed from mixed loads. Please clarify if "materials that cannot be recycled" are being removed from the loads for disposal, or if those materials remain and are stockpiled for screening and disposal.

e. §3.1.5 Recyclables. Please clarify the origin of the definition of "clean" referenced in this section. Please provide a revised operation plan that includes management procedures for all materials shown on Table 3-1, Figures 3-1 and 3-2, including special wastes and unacceptable wastes.

f. §3.1.8 Fire Protection and Controls. Please provide a detail drawing or schematic of the PVC grid system referenced in this section. Please clarify if the "water supply system" described in this section is the leachate spray system used for dust control. See also comments #2.j. and #3 below.

g. §3.2.0 MRF Signs and Fliers. Please provide details on the facility's lighting system. The proposed hours of operation include operation in non-daylight hours (e.g., 7:00am in December). Alternatively, please revise this section to require that operation will only occur during daylight hours.

h. §3.3.0 Leachate Control Narrative. Please revise this section to include any leachate collection components in the truck loading area. Please clarify whether the leachate from this area flows via gravity or is pumped to the wet well. See also comment #3. below. Please provide a copy of the most recent report for the inspection of the interior of the tanks, including photographs and description of any corrective actions as appropriate. Please specify the procedures, including frequency for, disposal of the accumulated solids and sediments. Please provide procedures for ensuring that liquids that accumulate in the secondary containment area are not impacted (i.e. contaminated) prior to discharging the liquids to the stormwater management system.

i. §3.5.0 Waste Screening. This section indicates that no waste will be disposed during non-daylight hours. This statement is not consistent with the hours of operation listed on the facility signage provided in §3.2.0. See also comment #2.g. above. Please clarify if Class III waste will be disposed of at WCA C&D debris disposal facility, and revise this section accordingly.

j. §3.6.0 Equipment Maintenance and Procedures. Please specify that all used oil and used oil filter collection containers will be properly labeled. 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 detailed and specific procedures for start up, and scheduled and unscheduled shut down operations.

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

3) Please provide specific procedures for waste management during a fire. Please specify where burning waste will be isolated. Please provide specific procedures for the management and disposal of clean-up residue.

(Comment #2.j. cont'd)

5) Please provide examples of types of liquids potentially spilled, types of absorbent materials used for clean-up, and proper disposal methods for these spent absorbents. Please provide waste characterization procedures for spent absorbent material and other wastes generated by clean-up.

k. §3.7.0 Closure Cost Estimate. Please clarify if the floors will be cleaned/washed when the facility is closed. Please clarify how the leachate in the sprinkler storage tanks will be disposed. Please provide revised cost estimates that include the costs for loading, hauling and disposing of the maximum quantity of all processed and unprocessed materials, residuals, unauthorized and special wastes that may be stored at the facility at any time. Please include copies of the third-party quotes supporting the costs. See also comment #1.b.(1) above.

3. **Plans and Drawings, Rules 62-701.320(7)(f), and 62-701.710(2)(b), F.A.C.** Department permits are issued for the specific processes and operations applied for and indicated on the approved drawing or exhibits. Therefore drawings provided with an application shall be of sufficient detail to show how the facility is designed and will be operated. Please provide detailed plans for the facility prepared under the direction of and signed and sealed by a professional engineer registered in the State of Florida. Please provide the following additional information and revisions to the plans.

a. It appears that the plan sheets provided do not accurately reflect the existing conditions at the facility. These inconsistencies should be discussed at the meeting requested at the end of this letter, and revised plan sheets should be provided as appropriate.

b. Site Plan (Sheet 1/3). Please explain why the leachate sprinkler line into the processing building is shown as a potable water line. The details regarding the leachate management system, potable water and sanitary sewer lines are unclear on this drawing. These details should be discussed at the meeting described above.

c. Miscellaneous Details (Sheet 2/3). Please provide a plan view that shows the orientation and location for the following details: Pipe to Tank Connection Detail, Trench Drain to HDPE Detail, Trench Drain Detail. The location of these details on the overall site plan is not given. Please provide details of the facility lighting system, and the PVC sprinkler system. See also comments #2.f & #2.h. above.

4. **Operational Contingency Plan (Appendix D).** See comment #2.j above. Please define what "minimum technology recycling" means as used in this section.

5. **Prohibitions, Rule 62-701.300, F.A.C.**

a. (2)(b) Potable Well. Please provide documentation that demonstrates that the facility well location complies with this prohibition.

b. (2)(d) Flooding. Please verify that the county or water management district have not prepared updated flood zone maps. If updated maps are available, please provide the updated maps.

6. **Equipment List (Appendix F).** Please provide equipment lists that correlate with the descriptions in the operations plan and the attached manufacturer's specification sheets (including pumps). Please provide a revised operation plan that includes the mulch coloring process, and provide plan sheets that show the location of this activity and associated drainage. Please explain how the water trucks are used to "process wood mulch" and "colorize mulch," and how the transfer trailers are used to "load [the] screen."

7. **Proof of Ownership, Rule 62-701.320 (7)(g), F.A.C.** Please provide documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a solid waste management facility.

8. **History of Enforcement Rule 62-701.320 (7)(i), F.A.C.** Please provide a history and description of any enforcement actions against the applicant relating to solid waste management facilities in this state.

9. **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.

10. **Application Form (Section 1), Rules 62-701.320(7)(b), 62-701.710(2), F.A.C.**

a. Item A.5. Please revise this item to reflect the facility WACS Identification number 51614.

b. Item C.1. Please provide a revised application form signed by the applicant.

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 March 23, 2009**, 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):

Orion J. Holtey, P.E., ojholtey@hsagolden.com

Susan Pelz, P.E., FDEP Tampa

Fred Wick/Frank Hornbrook, FDEP Tallahassee

Cindy Zhang-Torres, P.E., FDEP Tampa, Air section

State of Florida
Department of Environmental Protection
Notice of Application

The Department announces the receipt of an application for permit from the Sarasota County Environmental Services, Frank Coggins, Manager, Solid Waste Operations for the continued operation of a waste processing facility, subject to Department rules, located at 4000 Knights Trail Road, Nokomis, Florida, 34275.

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.