

# Florida Department of Environmental Protection

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Jeff Kottkamp Lt. Governor

> Mimi Drew Secretary

### Transmitted via email only to Casey. Stephens@bocc.citrus.fl.us

Mr. Casey Stephens, Director Citrus County Solid Waste Division P.O. Box 340 Lecanto, Fl. 34460-0340 September 27, 2010

RE:

Citrus County Central Class I Landfill, Phase 1/1A and 2 Landfill Gas Collection and Control System Construction Certification Permit No. 21375-017-SC/08, Citrus County WACS No.: SWD/09/39859

Dear Mr. Stephens:

The Department has reviewed the following information prepared in support of the Certification of Construction Completion for Phase 1/1A and 2 Landfill Gas Collection and Control System (GCCS) Construction:

Report of Construction... Citrus County Central Landfill Phase 1/1A & 2 Gas Collection and Control System Construction..., received on August 24, 2010, prepared by SCS Engineers.

Based on the Department's review of the information listed above, the Department requests that clarifying information and/or replacement documentation be provided to address the following comments regarding the above construction certification report. Please provide the information listed below by October 22, 2010.

# Report of Construction

- 1. Based on the Department's review of the information provided and a telephone discussion with Dan Cooper of SCS Engineers, Inc. on September 23, 2010, it appears that the interim gas collection and control system, permitted under Permit Modification #21375-016-SO/MM on April 30, 2009, was not constructed at the facility. Instead, construction of the components of the interim system that were to remain and become part of the Phase 1/1A & 2 GCCS was incorporated into the permitted construction of the Phase 1/1A & 2 GCCS. Where indicated below, please revise this construction certification report to refer to the design, permitting, and construction of components of the permitted interim system.
- 2. **Project Summary:** Please revise this section, as appropriate, to clarify that parts of the project were permitted under Permit Modification #21375-016-SO/MM.
- 3. **Site Background:** Please revise the narrative discussing additional background information to also reference the information provided as part of Permit Modification #21375-016-SO/MM.

4. **Contract Documents:** Please revise the narrative in this section to clarify that Sheets 17-27 of the referenced August 25, 2009 construction drawings were prepared based on the permit drawings approved as part of Permit No. 21375-017-SC/08 and the applicable design details included in the permit drawings approved as part of Permit Modification No. 21375-016-SO/MM.

#### 5. Construction Records:

## a. Record Drawings:

- 1) Please revise this section, as appropriate, to clarify that permitted project work was also permitted under Permit Modification #21375-016-SO/MM.
- 2) It appears that the changes noted in the table in this section reflect changes made from the August 25, 2009 construction drawings and not "permitted plans". Please verify and revise the table heading, as appropriate.
- 3) Upon completion of installation of the lateral from W-1 to risers 1, 2 & 3 at later date, supplemental documentation of the installation shall be submitted to the Department. This comment is for informational purposes only and does not require a response or submittal of information other than acknowledgement of the comment.

The following comment is provided for informational purposes and does not necessarily require a response, other than acknowledgement of the comment.

6. In accordance with Specific Condition #C.1.b. of Permit No. 21375-017-SC/08, operation of the gas collection and control system is not authorized until the construction certification is approved and a modification to the facility's operation permit is issued that authorizes operation of the system. As indicated below, the certification of construction completion is approved at the time. However Operation Permit Application No. 35435-018-SO/MM, which includes operation of the Phase 1/1A & 2 GCCS, is currently incomplete and therefore has not been issued.

In accordance with Specific Condition #C.1.b., temporary operation of the system is authorized for up to 180 days to allow for system start-up and operational adjustments while the certification of construction completion and permit modification submittals and approvals required by this specific condition were completed. On May 10, 2010, the County notified the Department that temporary start-up operation of the system began on April 23, 2010. Based on the April 23, 2010 start-up date, authorization for temporary operation of the system expires on October 23, 2010, unless otherwise extended by the Department.

Based on the Department's review of construction certification report referenced above, the Department has determined that the additional clarifying or replacement information requested above is minor in nature and that the Phase 1/1A and 2 Landfill Gas Collection and Control System was constructed substantially in accordance with the approved design and the construction requirements of Permit No. 21375-017-SC/08 and Permit Modification No. 21375-016-SO/MM. The Department therefore approves the certification of construction completion of the Phase 1/1A and 2 Landfill Gas Collection and Control System.

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Mr. Casey Stephens, Director Citrus County Solid Waste Division

Please provide **2 copies** of your response to this letter as one complete package. If you have any further question or comments regarding this letter, please contact me at (813) 632-7600 ext. 385.

Sincerely,

Steven G. Morgan Solid Waste Section Southwest District

sgm cc:

Daniel Cooper, P.E., SCS Engineers, <u>DCooper@SCSEngineers.com</u>
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