



Florida Department of Environmental Protection

Southwest District Office
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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

May 20, 2009

RE: Citrus County Central Class I Landfill
Landfill Gas Collection and Control System Construction
Pending Permit No. 21375-017-SO/08, Citrus County
WACS No.: SWD/09/39859

Dear Ms. Metcalfe:

This is to acknowledge receipt of the permit application prepared by SCS Engineers, dated and received April 22, 2009 for permit to construct a landfill gas collection and control system in Phases 1, 1A, and 2 of 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. This comment has been made by the Department on several recent applications submitted by the applicant. Please update your records to reflect this as the DEP ID Number on future applications.

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

2. **Section E.7:** Operation of the gas collection and control system will require submittal of an application for permit modification of the operation permit for the facility, including the submittal of the specific operation procedures for gas collection and control system, and issuance of the permit modification by the Department. The proposed changes to the Section 2 and 8 of facility Operation Plan in Attachment L-1 of this application do not provide sufficient detail on the specific operation procedures for the gas collection and control system. However, as indicated in this section, this application is for a permit to construct the gas collection and control system. Therefore modifications to the facility's operation plan will be deferred to the operation permit modification application and not processed as part of this application. **This comment is for informational purposes and does not necessarily require a response other than acknowledgement of the comment.**

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. **The drawings will be reviewed in their entirety, as applicable, after the responses to these requests for information are submitted.**

4. Recent discussions with the applicant have indicated potential problems with side slope riser piping at the facility that are currently being investigated. Please revise the design of the gas collection and control system in general and the details of tie-ins to the side slope riser piping specifically, based on the results of the investigation and proposed corrective actions, as applicable.

5. **Drawing 4 of 10:**

a. The cross-references for the "header ditch crossing" and "condensate sump" on this sheet appear to be in error. Please verify and revise this sheet, as appropriate.

6. **Drawing 8 of 10:**

a. Detail 4: This detail does not appear to show the inlet of the 2" condensate line from the blower/flare system. Please verify and revise this detail, as applicable.

**Attachment E-2 - Gas Collection and Control System Technical Specifications
(Rules 62-701.400(3), (7) and (8), F.A.C.)**

Please revise the Technical Specifications and/or other referenced application documents, as appropriate, to address the following comments and/or inconsistencies.

7. Please provide Technical Specifications for the compressed air system.

8. **Section 31 20 00 - Trenching and Backfilling:**

a. Part 1.01.D.: The statement that, "No classification of type of excavated material will be made." appears inconsistent with specifications for reuse of excavated soils and the disposition of excavated wastes and/or unsuitable soils. Please verify and revise this part, as applicable.

b. Part 3.04: Please note that dewatering may require an Industrial Waste Permit from the Department. Please contact Ms. Yanisa Angulo, P.E., at 813-632-7600 x404, to determine if a permit is required. **This comment is for informational purposes only and does not require a response.**

c. Part 3.06.C.: The pipe surveying specifications in this part appear inconsistent with those provided in Specification Section 01 50 00 - Part 1.05.C. Please verify and revise these sections, as appropriate.

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

9. **Section O.1:** Please provide the supporting design calculations for the blower/flare system.

10. **Section O.1.b:** While the facility is not subject to NSPS and is not required to install a landfill gas management system in accordance with Rule 62-701.530, F.A.C. at this time, if the applicant chooses to voluntarily install a landfill gas recovery system, then the system must be designed to function as required by Department rule. In accordance with Rule 62-701.320(5)(b), F.A.C., the information provided with the application must be of sufficient detail to show how the system will be constructed in order to comply with Department rules. Therefore please provide radius of influence calculations and pipe sizing calculations that demonstrate that the system is designed to function as required and revise the narrative in this section accordingly.

11. **Section O.4.c:** While the facility is not subject to NSPS at this time and is not required to install a landfill gas management system in accordance with Rule 62-701.530, F.A.C. at this time, if the applicant chooses to voluntarily install a landfill gas recovery system, then the system must be designed to function as required by Department rule. Please revise the narrative in this section accordingly.

12. **Section O.4.e:** Since the applicant is installing and operating the gas system on a voluntary basis and therefore may choose not to operate the system in the future, please provide a closure plan for decommissioning and dismantling the system should the applicant choose to not operate the system in the future.

13. **Section 0.4.f & and Attachment S-1:** Since the applicant is installing and operating the gas system on a voluntary basis and therefore may choose not to operate the system in the future, please revise Attachment S-1 to include closure cost estimates for decommissioning and dismantling the system should the applicant choose to not operate the system in the future.

14. **Attachment O-3:** Please explain why the default model values used to obtain the landfill gas generation data in Attachment O-3 are different than those used in the June 29, 2006 NSPS Tier 2 report provided.

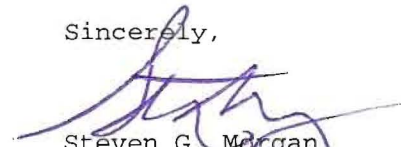
Please provide all responses that relate to engineering for design and operation, including plan sheets, signed and sealed by a professional engineer. Responses that relate to the facility operations should be included as part of the Operation Plan. All replacement pages should be numbered, and with 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 July 6, 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 above schedule, you should develop an alternate timetable for the submission of the requested information for Department review and consideration. 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.

Please provide **4 copies** of your response to this letter as one complete package. If there are points that must be discussed and resolved or you would like to set up a meeting to discuss this letter and subsequent submittals, please contact me at (813) 632-7600 ext. 385.

Sincerely,



Steven G. Morgan
Solid Waste Section
Southwest District

SM/sgm

Attachment

cc: 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)