



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

July 2, 2009

RE: Citrus County Transfer Station
Pending Permit No. 296143-001-SO/30, Citrus County
WACS No.: SWD/09/39859
1st Request for Additional Information

Dear Ms. Metcalfe:

This is to acknowledge receipt of the permit application prepared by King Engineering Associates, Inc., dated June 10, 2009 (received June 11, 2009), to construct and operate a Class I transfer station and related appurtenances, referred to as the Citrus County Transfer Station, 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. 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 may 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.

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.

PART B - ADDITIONAL INFORMATION (Rule 62-701.710(2), F.A.C.):

Introduction - Rule 62-701.710(2)(a), F.A.C.:

2. Please revise this section to also indicate that the facility accepts waste tires and to list the relocated waste tire facility as one of the proposed improvements to the facility. Please explain what will be stored in the "dry storage building".

3. This project includes the relocation of the waste tire facility permitted under Department Permit No. 126602-002-WT/02. Please note that prior to transferring waste tire collection operations to the new CSA area, the applicant will need to apply for a modification of Permit No. 126602-002-WT/02 to reflect the new location and any changes to the operation of the waste tire facility (including changes waste tire quantities on-site), proposed by this application, as applicable. **This comment is for informational purposes only and does not necessarily require a response.**

4. Construction Phasing- Phase 1: Please provide or revise an existing figure or plan sheet in this application to identify the proposed location where the "temporary yard waste processing area" will be constructed.

Section 3 - Operation and Function of Processing Equipment (Rule 62-701.710(2)(c), F.A.C.):

5. Section 3a - Regular Facility Operations (Rule 62-701.710(2)(c)(1), F.A.C.):

a. It does not appear that overhead lighting will be provided in the transfer station building. Please revise this section to indicate that waste acceptance and processing will not occur during non-daylight hours and during periods of time when inadequate lighting is provided through the proposed windows in the transfer station. Please also provide this information in Section 1.2 of the Operation Plan.

6. Section 3c - Potential Safety Hazards and Control Methods (Rule 62-701.710(2)(c)(3), F.A.C.):

a. Fire Protection: Please revise this section to verify that the local fire authorities will review and approve the proposed fire system for the facility and/or will conduct an inspection of the system upon installation to verify that adequate fire protection has been provided in accordance with Rule 62-701.710(4)(e), F.A.C., prior to operation of the facility.

- b. Unauthorized or Hazardous Materials:
- 1) Please revise this section and/or Section 6.2 of the Operation Plan to indicate that the Department will be notified in the event that a driver refuses to accept back unauthorized waste, when requested.
 - 2) Please revise this section and/or the appropriate section of the Operation Plan verify whether the "temporary holding area" for unauthorized waste will be located at a designated location in the transfer station or will be established on a daily basis.

Section 4 - Design Requirements (Rule 62-701.710(3), F.A.C.):

7. **Rule 62-701.710(3)(a), F.A.C.:** The volume of waste proposed to be processing through the transfer station do not appear to warrant the need to park loaded transfer trailers outside leachate containment (i.e. in an area other than the transfer station tipping floor or tunnel) overnight. Please verify and revise this section and the appropriate section of the Operation Plan accordingly.
8. **Rule 62-701.710(3)(b), F.A.C.:**
- a. Please provide supporting calculations that existing leachate pump station is capable of handled the anticipated additional leachate generated by the proposed transfer station.
 - b. Please verify whether, in the event leachate cannot be treated at the treatment plant, leachate from the transfer station would be loaded out for transport to a wastewater treatment plant at the lift station emergency pump-out connection or as described for the leachate management system for the landfill and revise this section and/or the applicable section of the Operation Plan, as applicable.

Section 6 - On-Site Storage Areas for Recyclables Materials, Non Processible Wastes and Residues (Rule 62-701.710(2)(e), F.A.C.):

9. Please revise this section to indicate that tires will be managed at the CSA in accordance with the facility's waste tire permit (see Comment #3).

Section 12 - Stormwater Management (Rule 62-701.710(8), F.A.C.):

10. **Attachment K:**
- a. There appears to be the potential for discharge of contaminants from solid waste processing and storage activities in the CSA and HHW into the stormwater management system. Please verify whether these operation activities were considered and addressed in the ERP permit modification and/or provide documentation from the ERP section that no additional modification of the ERP permit is required for these activities. Alternatively, please provide a revised ERP permit modification that addresses these issues.
 - b. Please provide a copy of the ERP permit modification upon issuance and, as applicable, either a copy of the permit drawings referenced in the ERP permit or references to the corresponding drawings provided in the construction plan set provided with this application.

Section 14 - Proof of Publication (Rule 62-701.320(8), F.A.C.):

11. Please publish the attached Notice of Application and provide proof of publication to the Department.

Section 15 - Conformance with Prohibition (Rule 62-701.300(2)(a), F.A.C.):

12. **Rule 62-701.300(1)(b), F.A.C.:** Please explain how the activities in the CSA and HHW will comply with this prohibition (see Comment #10.b.).

13. **Rule 62-701.300(8)(a), F.A.C.:** It is unclear whether lead-acid batteries discovered at the transfer station will be isolated and removed from the facility separate from the lead-acid battery management at the HHW facility. Please verify and revise this section accordingly.

Attachment C - Site Plan:

14. Please revise Attachment C, as applicable, based on your responses to comments on Sheet C3.00 of the Construction Drawings.

Attachment H - Operation, Maintenance and Contingency Plan (Rule 62-701.710(9), F.A.C.):

Please provide the following additional information and revisions to the facility Operation, Maintenance, and Contingency Plan. This report will be reviewed in its entirety after responses are received.

15. **Introduction:**

a. It is indicated in Section 9 of the Engineering Report and in this section that Attachment H will become an appendix of the Class I landfill Operation Plan. Please note that the Table of Contents of the Class I Operation Plan will need to be amended as part of the below noted modification of the Class I operation permit to reflect the additional appendix to the plan. **This comment is for informational purposes only and does not necessarily require a response.**

b. Throughout Attachment H, there are numerous references to specific sections of the existing Class I landfill Operation Plan and/or references to procedures in that plan, in lieu of providing the information in Attachment H. As indicated in several comments below, a review of the existing Class I Operation Plan reveals that the referenced sections and/or narrative procedures may either not reference the operation of the transfer station, CSA, and related operational activities or may describe procedures inconsistent with the proposed operation of the transfer station, CSA and related operation activities in this application. Such inconsistencies shall require the submittal of an application for modification of the existing Class I operation permit to revise the Class I Operation Plan accordingly and may require issuance of such modification prior to issuance of the transfer station permit. Please review the Class I Landfill Operation Plan accordingly, and either submit a minor permit modification application of the Class I Operation Permit or revise Attachment H to serve as a stand-alone operation plan for the transfer station and related operation activities.

16. **Section 1.1:** Please revise this section to also list the permitted waste tire facility as one of the co-located facilities.

17. **Section 1.2:** Please revise the appropriate section of the Operation Plan to specifically describe the procedures for unloading waste at the "self-haul unloading area" at the transfer station.

18. **Figure 1-1:** Please revise Figure 1-1 to identify each of the individual waste storage and processing areas in the CSA and HHW facility (e.g. tires, white goods, scrap metal, paints, electronics, used oil, antifreeze, etc.)

19. **Section 2.1:** The operator and spotter training requirements for a waste processing facility (i.e. transfer station) are inconsistent with those for a Class I landfill. Please revise this section and the Landfill Operation Plan, as applicable. Please note that initial Class I landfill operator training cannot substitute for required initial waste processing facility operator training.
20. **Section 2.2.:** Please note that the Landfill Field Crew Leader and Customer Service Supervisor shall be certified waste processing facility operators to have overall responsibility for operation of the transfer station and related operations. **This comment is for informational purposes only and does not necessarily require a response.**
21. **Section 2.3.:** Please revise this section, where applicable, to discuss contingency operations for emergencies for the CSA and HHW facility.
22. **Section 2.3.1:** Please revise Appendix A of the Landfill Operation Plan, as appropriate, to include the transfer station, CSA, and HHW facility operations.
23. **Section 2.3.3:** Please revise this section and/or Section 2.3.3 of the Landfill Operation Plan, as appropriate, to include the transfer station, CSA, and HHW facility operations, and to be consistent with the Section 3 of the Engineering Report.
24. **Section 2.4:**
- a. Please revise this section to explain the procedures if the scale house attendants notes unacceptable wastes in an incoming load.
 - b. Please revise this section to expand the list of unacceptable waste at the transfer station to include prohibited items listed in Rule 62-701.300(5) though (8), (10), and (12), F.A.C.
 - c. Please revise this section to verify that the CSA can accept "household" hazardous wastes.
 - d. Please revise Section 2.4 of the Landfill Operation Plan, as appropriate, to include the transfer station, CSA, and HHW facility operations.
 - e. Section 1 of the Engineering Report and Section 2.4 of the Landfill Operation Plan indicate that the HHW facility will accept Conditionally Exempt Small Quantity Generator (CESQG) waste. Please note that the Department's Hazardous Waste Section may need to be notified and approve the acceptance of CESQG waste. Please contact Beth Knauss, at 813-632-7600 x383, to determine if notification and approval is required. Please revise Section 2.4 of the Landfill Operation Plan, as applicable.
25. **Section 2.5:** Please revise this section to provide a more detailed description of waste unloading at the "self-hauling unloading area".
26. **Section 2.6.2:** Please verify that the reference to the "transfer station of the landfill" is a typographic error and revise this section accordingly.
27. **Section 2.7:** Please verify that the reference to Section 7 of the Landfill Operation Plan is a typographic error and revise the applicable section of the Landfill Operation Plan, as appropriate, to include the transfer station, CSA, and HHW facility operations.

28. **Section 3:** The operation records in Section 3 of the Landfill Operation Plan appear inconsistent with records typically maintained and reported for transfer station, CSA, and HHW facility operations. Please verify and revise Section 3 of the Landfill Operation Plan, as appropriate.

29. **Section 4:** The waste records in Section 4 of the Landfill Operation Plan appear inconsistent with waste records typically maintained and reported for transfer station, CSA, and HHW facility operations and do not appear to include all waste types proposed to be accepted at the transfer station, CSA, and HHW facility. Please verify and revise Section 4 of the Landfill Operation Plan, as appropriate.

30. **Section 5:** Please revise Section 2.4 of the Landfill Operation Plan, as appropriate, to reference the transfer station, CSA, and HHW facility operations.

31. **Section 6.1:**

a. This section refers to waste inspection accordance with Section 6.1 of the Landfill Operation Plan. Please verify whether the load checking procedures in Section 6.1 of the Landfill Operation Plan will be implemented for incoming loads to the transfer station and CSA.

b. The narrative description of waste inspection in Section 6.1 of the Landfill Operation Plan appears inconsistent with waste inspection procedures at a transfer station, CSA, and HHW facility. Please verify and revise Section 6.1 of the Landfill Operation Plan, as appropriate.

32. **Section 7:** Please verify that the reference to Section 9 of the Landfill Operation Plan is a typographic error and revise Section 10 of the Landfill Operation Plan, as appropriate, to include the transfer station, CSA, and HHW facility operations.

33. **Section 8:** Please verify that the reference to Section 10 of the Landfill Operation Plan is a typographic error and revise Section 11 of the Landfill Operation Plan, as appropriate, to include the transfer station, CSA, and HHW facility operations.

Attachment I - Technical Specifications (Rule 62-701.400(1), F.A.C.):

Please provide the following additional information and revisions to the Technical Specifications. The Technical Specifications will be reviewed in their entirety, as applicable, after responses are received.

34. **Special Conditions:**

a. Part 1.0.B.1: Please revise this section include the submittal of certification of construction completion documentation to the Department as the one of the requirements of placing the Phase I constructed facilities into service.

b. Part 2.0.B.: Please revise this section clarify that contaminated concrete and steel, if applicable, may not be disposed of a recycling facility.

35. **Section 02200 - Site Preparation:**

a. Parts 3.01.A., 3.02.A.1., and 3.04.A.: Please verify that the references to the "limits of landfill" and "landfill limits" are typographic errors and revise these parts, as appropriate.

b. Part 3.08.A.1.: Please define the term "debris" in Part 1.01, and based on that definition, identify the type of "off-site facility" where the debris will be disposed.

36. **Section 02240 - Dewatering:** 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.**

37. **Section 02450 - Gravity Leachate Sewer Collection System & Force Main:**

a. Part 1.02.A.: Specification Section 01300 referenced in this part does not appear to have been provided in Attachment I. Please verify and provide Section 01300, as appropriate.

38. **Section 02451 - Duplex Submersible Leachate Pump Station:**

a. Part 2.02.E.: The operational procedures in this part should be included in the transfer station Operation Plan in Attachment H. Please revise Attachment H accordingly.

b. Part 3.02.A.: Specification Section 01700 referenced in this part does not appear to have been provided in Attachment I. Please verify and provide Section 01700, as appropriate.

GEOTECHNICAL INVESTIGATION FOR THE PROPOSED CITRUS COUNTY SOLID WASTE TRANSFER STATION, DATED JUNE 2009, prepared by CH2M Hill (Rule 62-701.410, F.A.C.)

Please provide the following additional information and revisions to the Geotechnical Report. This report will be reviewed in its entirety, as applicable, after responses are received.

39. **Section 1:** Please verify the number of CPT soundings conducted for this project and revise this section, as appropriate (See Comment #41).

40. **Section 2 & Table 1:** The list of proposed construction in this section appears to be inconsistent with all the proposed construction at the site (e.g. CSA, fuel storage area, yard waste area, etc). Please revise this section and Table 1 accordingly to describe all proposed construction. Please verify whether field exploration was conducted in all proposed construction areas at the site. If field exploration for a particular construction activity has not been conducted, please explain why such field exploration was not conducted.

41. **Section 3.2:** This section indicates that 9 CPT soundings were conducted as part of Phase II exploration. Figure 2 identifies 10 CPT sounding locations (A-1 through A-10). Appendix A provides CPT sounding logs for 11 soundings (A-1 through A-6, A-6A, A-7, A-8 & A-8A, and A-9). Please verify these apparent inconsistencies and revise this section, Figure 2, and Appendix A accordingly.

42. **Section 4.0:** Please revise this section to describe the field exploration conducted for all proposed construction activities (See Comment #40).

CONSTRUCTION PLAN SET TITLED - CITRUS COUNTY SOLID WASTE TRANSFER STATION and ASSOCIATED SITE IMPROVEMENTS (RULE 62-701.320 (7) (f), F.A.C.)

Due to the complexity of the project and difficulty in describing some of the Department's comments and questions related to these drawings, these drawings will be discussed in detail at the meeting requested at the end of this letter. Please provide revised drawings that include all necessary details for the construction and operation of the facility and address the comments below and discussed during the above-referenced meeting. The construction plan set will be reviewed in its entirety, as applicable, upon receipt of the revised drawings.

43. Sheet G1.00:

- a. Structural Sheets: Please provide Sheet S0.01 and the listed structural sheets for the Transfer Station Building and Household Hazardous Waste Building not previously provided.
- b. Please provide Sheets A0.02 and A2.10.

44. Sheet C2.03:

- a. This sheet shows "CSA & Yard Waste" exiting on the entrance road to the west of the 24-hour Recycling Center. Other sheets in this plan set show fencing across the road south of the Recycling Center. Please verify whether traffic from the CSA and Yard Trash Facility can exit via this west road. If exiting is an option along this road, please explain how access to the remainder of the facility by after-hours customers utilized the 24-hour Recycling Center is prevented. Please revise this sheet as applicable.
- b. Please verify whether the eastbound "CSA Transfer (roll-offs)" arrow south of the transfer station is correct and revise this sheet as appropriate.

45. Sheets C3.00:

- a. Please revise this sheet to identify all proposed waste processing and/or storage areas, bins, and/or tanks at the facility. Alternatively, if this sheet becomes too cluttered to identify each designated area, then please revise Sheet C3.01 through C3.05 accordingly and provide a Figure(s) to replace the site plan in Attachment C of the Engineering Report and Figure 1-1 in the Operation Plan, which identifies all the waste storage and processing areas, bins and/or tanks.

46. Sheet C8.07:

- a. The invert elevations reported for LMH #1 on this sheet (113.10/113.00) appear inconsistent with gravity drainage of leachate to the leachate pump station based on the invert elevation of inlet pipes shown on Sheet M8.00 (113.20). Please verify and revise this sheet and/or Sheet M8.00, as appropriate.
- b. The referenced to continuation on Sheet C6.08 for the "40 LF 8" HDPE Leachate" line on this sheet appear to be a typographic error. Please verify and revise.

47. Sheets M3.00 through M3.02:

- a. Please be advised that the fueling station may require registration from the Citrus County Storage Tank Program. Please contact them to determine if registration is required. **This comment is for informational purposes only and does not require a response.**

48. **Sheets M5.00 & M5.01:**

a. Please explain from where the "Ex. 3" Leachate Transfer" line conveys leachate.

49. **Sheets M6.00 & M7.00:**

a. Please be advised that the Aerobic Drip Tape Septic System and Leach Field he E-One pump station may require a permit from the Citrus County Health Department Septic Tank Program. Please contact them to determine if a permit is required. **This comment is for informational purposes only and does not require a response.**

50. **Sheets M8.00:**

a. Typical Lift Station: The lift station emergency pump-out connection does not appear to be located within containment to prevent discharge of leachate during pump-out operations. Please verify and explain.

b. Lift Station Emergency Pump-out Connection: Please verify the reference to Detail V-10 in the note for this detail and revise the note, as appropriate.

51. **Sheet S1.14:**

a. Section K & Detail 2: Please identify and provide the plan sheet(s) that show where Section K and Detail 2 are located.

52. **Sheet A1.03:**

a. Please explain how leachate is prevented from discharging out the entrance to the self-hauling loading area and how waste is prevented from be dumped or spilled outside the transfer station Building during self-haul waste unloading (See Comment #17).

53. **Sheet P2.01:**

a. Please provide the referenced structural drawings for the trench in the electronics/paints/battery storage area.

b. Please verify that the waste oil tanks containment area has secondary containment for 110% of the largest tank (i.e. 550 gallons).

54. **Sheet P4.01:**

a. The use of underground storage tanks for runoff from the HHW drive-thru and the electronics/paint/battery storage areas, that potential could contain hazardous waste and be discharged to stormwater via the automatic pump system in the tanks appears problematic, may be or may result in violations of the Department Solid Waste and/or Hazardous Waste regulations, and should be discussed in detail during the meeting requested at the end of this letter. Please review and revise the design of this system, as appropriate, based on the comments provided by the Department during the above referenced meeting.

b. Please provide Detail 29-T-01 for the storage tanks and Detail 20-SP-02 for the sump pump and technical specifications for both, as applicable.

c. Please identify the capacity of each storage tank, as applicable.

55. **Sheet P6.01:**

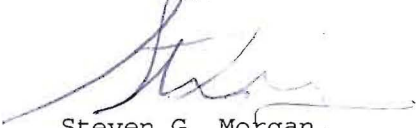
a. Please provide similar plumbing diagrams, including inlet and outlet elevations, for the HHW drive-through floor drain system and the electronics/paint/battery storage area drainage system.

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 the date established in the meeting referenced below, 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.

You are requested to submit your response to this letter together, as one complete package. A meeting will be scheduled with the applicant, consultant, and Department staff to discuss the requested information prior to the submittal of additional information. Please contact me at (813)632-7600 ext. 385 to schedule the meeting.

Sincerely,



Steven G. Morgan
Solid Waste Section
Southwest District

SM/sgm

Attachment

Cc: Christopher Kuzler, P.E., King Engineering Associates, Inc., CKuzler@kingengineering.com
Al Gagne, FDEP Tampa, ERP (e-mail)
Yanisa Angulo, FDEP Tampa, IW (e-mail)
Laurel Culbreth, FDEP Tampa, Tanks (e-mail)
Beth Knauss, FDEP Tampa, HW (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 to construct a solid waste transfer station, citizen service area, and related appurtenances, subject to Department rules, referred to as the Citrus County Transfer Station, at the existing Citrus County Central Class I Landfill site, 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.