



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT  
8800 BAYMEADOWS WAY WEST, SUITE 100  
JACKSONVILLE, FLORIDA 32256

RICK SCOTT  
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SECRETARY

January 18, 2013

Transmitted via email to: [jmmts@bellsouth.net](mailto:jmmts@bellsouth.net)

Mr. John E. Myers, Owner  
Sandhill Recycle Center  
153326 County Road 108  
Yulee, Florida 32097

**Re: Sandhill Recycle Center C&DD  
Facility WACS I.D. Number: 87973  
Permit Renewal with Modified Closure Construction  
DEP File Number: 148418-014  
Request for Additional Information  
Nassau County – Solid Waste Permitting**

Dear Mr. Myers:

The Florida Department of Environmental Protection (Department) has reviewed the above-referenced application for a permit renewal with modified closure construction, dated December 5 and 28, and received on December 7 and 28, 2012, respectively. The following reviews are enclosed.

Attachment 1, Review Memorandum, dated January 17, 2013, prepared by Michael Bogin.

Attachment 2, Review Memorandum, dated January 14, 2013, prepared by Neil Hornick, P.G.

Please provide the requested information by February 18, 2013, and note that it is necessary for the Department to continue processing your submittal. Action on the submittal may therefore be delayed until the requested information is received in this office. Also, please reference the associated DEP file number and WACS Facility I.D. number in all written correspondence concerning this project. If you have any questions or comments about this matter, please contact Michael Bogin by mail at the letterhead address, by email at [Michael.Bogin@dep.state.fl.us](mailto:Michael.Bogin@dep.state.fl.us), or by telephone at 904.256.1579.

Sincerely,

A blue ink signature of Emerson C. Raulerson, P.E. The signature is written over a faint background of the Florida Department of Environmental Protection logo.

Emerson C. Raulerson, P.E.  
Solid Waste Section Supervisor

**MB**  
mb/db  
Enclosure

cc: Samuel B. Levin, P.E., S2L, Incorporated, [slevin@s2li.com](mailto:slevin@s2li.com)  
Junhong Shi, P. E., DEP, [Junhong.Shi@dep.state.fl.us](mailto:Junhong.Shi@dep.state.fl.us)

# Florida Department of Environmental Protection

## Memorandum

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**TO:** Emerson C. Raulerson, P.E. *ECR*  
Solid Waster Section Supervisor

**FROM:** Michael Bogin, Engineering Specialist IV  
Solid Waste Section *MB*

**DATE:** January 17, 2013

**SUBJECT:** **Sandhill Recycle Center C&DD**  
**Facility WACS I.D. Number: 87973**  
**Permit Renewal with Modified Closure Construction**  
**DEP File Number: 148418-014**  
**Request for Additional Information**  
**Nassau County – Solid Waste Permitting**

The Florida Department of Environmental Protection (Department) has reviewed the above-referenced permit renewal application with modified closure construction, dated December 5 and 28, and received on December 7 and 28, 2012, respectively. Below are comments and/or requests for additional information:

When responding to this Request for Additional Information (RAI) if a response modifies a section of the Permit Application (e.g., Engineering Report, etc.) the respective section(s) should be modified accordingly. A revised, complete version of the plans that includes all revisions made in responding to this RAI should be attached. To enable the Department to view changes to the plan, all additions should be underlined (e.g., added) and all deletions should be struck through (e.g., ~~deleted~~). Additionally, the submittal should make a positive statement that all revisions have been tracked in the aforementioned way. By this method, the Department hopes to have one final version of the respective plans that includes all revisions made during this permitting process.

1. While Section (9) "Closure" of the Engineering Report and Section 15.0 "Closure Plan" of the Operation Plan indicate elevations in feet above mean sea level, please note that the existing permit and the submitted drawings specify elevations in feet of the National Geodetic Vertical Datum (N.G.V.D). Please make the referenced elevations consistent or provide a conversion factor from one system to another.
2. According to the Engineering Report and the Operation Plan, the facility's Environmental Resource Permit Number (i.e., 45-148428-004-EI) will be modified and submitted under a separate cover. Stormwater calculations for terraces, downcomer pipes, berms, etc. related to the proposed redesigning of the side slopes in Cells A, B, and C should therefore be included and submitted with the Environmental Resource Program permit modification.

3. Appendix C. Closure Cost and Long-Term Care Estimates.
  - a. Item IV.2. While the facility has already placed an estimated 3,700 cubic yards of soil on portions of the north, east and west sides of Cell A during a “close-as-you-go” procedure, a closure construction completion report for those “closures” has not been provided to the Department. The referenced areas are therefore not “officially” closed, so the original required volume of soil should stay unchanged.
  - b. Item IV.2. Please consider using a 1.1 slope factor to convert from the plan view area in the soil volume calculation.
  - c. Item IV.4. While the facility has already placed an estimated 1,200 cubic yards of vegetative supporting material on portions of the north, east and west sides of Cell A during a “close-as-you-go” procedure, as indicated in item 3.a, above, since the areas are not officially closed, the original required volume of top soil should stay unchanged.
  - d. Item IV.2. Please consider using a 1.1 slope factor to convert from the plan view area in the top soil volume calculation.
  - e. Item V.1. Please note that a technical report (previously called a biennial report) is required every five years (not twice) during the long-term period. Therefore, the cost may be adjusted accordingly.
  - f. Item V.2. Please note that Specific Condition 34(a) of the existing permit requires the facility to analyze surface water at location SW-1 semi-annually for the parameters listed in Attachment 5. Please revise the cost accordingly.
  - g. Item V.3. Please note that neither the existing permit nor Rule 62-701.730, F.A.C. requires routine gas monitoring. Please clarify whether the applicant is proposing to conduct gas monitoring in the permit renewal Application. If not, please address.
4. Neither the Application nor the Engineering Report indicates that the proposed modification includes a lateral expansion; however, the Geotechnical Investigation Report on page 1 states, “The original plan area was approximately 1,350 by 800 feet and the landfill was to extend to EI +130 feet. The proposed expansion will result in a plan area of approximately 1000 feet by 1,350 feet with the top of the landfill extending to EI. +153 ft.” Please clarify.
5. While the Geotechnical Investigation Report states that a factor of safety of 1.6 was achieved in the slope stability calculation, it does not evaluate the proposed 40-foot vertical separation between stormwater terraces that may create erosion problems with soil loss due to high velocity stormwater running down the side slopes. Please address.
6. Please provide the foundation settlement analysis mentioned in Section 9.2 of the Geotechnical Investigation Report.

# Florida Department of Environmental Protection

## Memorandum

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**TO:** Michael Bogin *MB*  
Solid Waste Section

**THROUGH:** Emerson C. Raulerson, P.E. *ECR*  
Solid Waste Section Supervisor

**FROM:** Neil Hornick, P.G. *NH*  
Solid Waste Section

**DATE:** January 14, 2013

**SUBJECT:** **Sandhill Recycle Center and Construction and  
Demolition Debris (C&D) Disposal Facility  
Application for a C&D Disposal Facility Permit  
Renewal with Modified Closure Construction  
Nassau County – Solid Waste**

I have completed review of the groundwater monitoring sections of the above-referenced Application for a C&D Disposal Facility Permit Renewal with Modified Closure Construction (Application) for the Sandhill Recycle Center and Construction and Demolition Debris Disposal Facility (Facility). The original Application, prepared by S2L, Incorporated for the above-referenced site pursuant to the Department's Permit No. 00148418-009-SO, was dated and received December 5 and 7, 2012, respectively (the full application fee was received later). An application addendum, Update to Hydrogeologic Investigation & Groundwater Quality Monitoring Plan (Plan), prepared by Dominion, Inc. was dated and received December 28, 2012. Comments concerning the Plan are specified below:

1. The Plan proposes to discontinue the monitoring of shallow well DW-3A. Please note that due to consistent Arsenic and Sodium exceedences in the intermediate well (DW-3B) as well as its location as the most upgradient shallow well of the active C&D facility, the permit will require the continued monitoring of DW-3A.
2. While detection wells DW-4 (A,B,C) and DW-5 (A,B) were installed to monitor the western and southwestern portions of the facility, no wells were installed to specifically monitor the western portion of Cell A. However, since waste has not yet been placed in Cell B, those wells are not yet being sampled, so the western portion of Cell A is also not being monitored. Therefore, please either provide a proposal for the installation of an additional detection well cluster west of the currently active C&D area or the inclusion of DW-5 (A,B) as part of the active monitoring Plan.

Should you have any questions concerning this matter, please direct all correspondence to me at the letterhead address or at [Neil.Hornick@dep.state.fl.us](mailto:Neil.Hornick@dep.state.fl.us), or contact me by telephone at 904.256.1574.

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