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Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

Mr. W. Michael Daniel, President
W. Clyde Daniel Construction, Inc.
5025 Baseball Pond Road
Brooksville, Fl. 34602

April 28, 1998

RE: Sunshine Grove Road C&D Debris Disposal Facility CDD 2000-03
Pending Permit No.: 22886-001-SO, Hernando County

Dear Mr. Daniel:

This is to acknowledge receipt of your application, dated March 24, 1998 (received March 31, 1998), for a permit to operate a solid waste management facility referred to as the Sunshine Grove Road C&D Debris Disposal Facility.

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.

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

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.
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. **Notice of Application.** (62-701.320(8)(a), F.A.C.) Please publish the attached Notice of Application, and provide proof of publication to the Department.
5. **Topographic Survey and Boundary Survey.** (62-701.320(7)(f)5. and 62-701.730(2)(b), F.A.C.) Please provide a topographic survey and boundary survey which includes the original signature and seal of the professional land surveyor who prepared it. The "as-built submitted to SWFWMD by Nicholson Engineering Associates with a statement of completion for the retention pond...." (page 3 and Attachment 5) does not meet the requirements for a boundary survey or topographic survey. Please show all areas (Phase boundaries) which are currently filled and any areas which are expected to receive waste in the five-year permit period.
6. **Fuel Storage Area.** (62-701.730(7)(f), F.A.C.) Please show the location and details of the fuel storage area on a plan sheet.
7. **Regional Map and Aerial Photograph.** (62-701.320(7)(f)4., F.A.C.) Please provide a regional map and current aerial photograph. (see also Attachment 1)
8. **Prohibitions.**
 - a. Sinkholes. (62-701.300(2)(a) and (b), F.A.C.) See Comment #15, below. The "general" information submitted in 1993 was previously required for a general permit. However, since a general permit is no longer applicable to C&D debris disposal facilities, site-specific information must be submitted in support of the permit application.
 - b. Flood Zones. (62-701.300(2)(e), F.A.C.) Please provide documentation which demonstrates that the facility is not located in an area of frequent and periodic flooding.
 - c. Potable Wells. (62-701.300(2)(c) and (i), F.A.C.) Please provide a map which shows the locations of all potable wells within 500 feet, and community supply wells within 1000 feet of the site. The map included in Attachment 8 is not of a sufficient scale to provide adequate information concerning the locations of the wells. (Engineering Report, page 6)
 - d. Surface Water Bodies. (62-701.300(2)(g), F.A.C.) The information states, "The Phase 1 area is not within 200 feet of any natural or artificial body of water, including wetlands." (Engineering Report, page 5) Please be advised that stormwater management systems which contain water are considered to be "surface water bodies" for the purposes of compliance with this prohibition. Since waste appears to be disposed within 200 feet of the stormwater management system, please clarify if the stormwater management system discharges from the site. If the stormwater management system discharges from the site, surface water monitoring may be required to demonstrate that Department water quality standards are not violated by discharges from the site.

9. **Design/Planned Active Life.** (62-701.730(2)(a)4., F.A.C.) Please provide an estimate of the planned active life of the facility. Please include the assumptions which support the projections. Please provide drawings which show the design of the disposal areas and the design height of the facility. See also Comment #14, below.
 10. **Certification.** (62-701.730(3), F.A.C.) Please clarify if Phase 1 (cell floor) has been completely constructed. Please provide procedures for constructing (and certifying) new disposal cells. Please provide a plan sheet which includes a cross-sectional view of Phase 1 with the current, and proposed final, contours.
 11. **Stormwater management.** (62-701.730(5), F.A.C.) Please provide a copy of the current permit for stormwater management.
 12. **Closure Plan.** (62-701.730(9), and (10), F.A.C.)
 - a. Please provide a Closure Plan. The Closure Plan must include, at a minimum, specific timeframes for applying final cover, procedures for applying final cover, procedures for ensuring that the facility has been appropriately compacted and graded to promote drainage, etc.
 - b. Please provide a Long-Term Care Plan. Please provide specific procedures for monitoring and maintaining the facility for the long-term care period. These procedures must include, at a minimum, a description of the activity (e.g. groundwater monitoring, erosion control, mowing, reporting etc.), and specify the minimum frequency.
 13. **Permit Application.** (62-701.730(2), F.A.C.) Since the facility is a C&D Debris (C&DD) disposal facility, please explain why Items #A.1. and Section B. of the application form indicate that the only activities will be recycling.
- Engineering Report.** (62-701.320(7)(d), F.A.C.)
14. **Sheet S1, Site Plan.** (62-701.730(2)(a) and (7)(a), F.A.C.)
 - a. Please provide a Site Plan, or other appropriate plan sheets, which include a regional map, and vicinity map or aerial photograph taken within one year. (62-701.320(7)(f)3. and 4., F.A.C.)
 - b. Please provide a Site Plan, or other appropriate plan sheet(s), which show the proposed method and sequence of filling for the next five years. The plans should include lift depths, slopes, grades required for drainage, and an estimated schedule for filling. It does not appear that sufficient details of the stormwater management system have been provided. Although the closure elevations are shown on the cross-section, please provide details for the construction of the bottom of the disposal unit. Please specify the "grade to drain". Please specify the slopes which will be "maintain[ed]" on the closure.

(Comment #14, cont'd)

c. Please provide a Site Plan which includes a north arrow for reference. Sheet S1 does not appear to include a north arrow. (62-701.320(7)(f)6., F.A.C.)

d. Please provide a Site Plan, or other appropriate plan sheet, which shows the project location and identifies the total acreage of the site. (62-701.730(2)(a)1., F.A.C.)

15. **Geotechnical Investigation.** (62-701.410(2), F.A.C.)

a. Subsurface Soil Exploration Construction & Demolition Debris Landfill....., prepared by Central Testing Laboratory (CTL), dated August 25, 1993.

1) Please provide settlement calculations. (page 7)

2) Please clarify the depth of waste. This report indicates that the depth of waste will be approximately 30 feet. (page 2) However, Sheet S1, Site Plan, dated March 1998, indicates that the waste will be approximately 35 feet deep.

3) Please provide the lineament study referenced, or a more current lineament study. Please provide a map which shows the locations of "the reported sinkholes in the area." (page 7)

b. Please provide a current evaluation of the potential for sinkhole development in the vicinity of the site. The Geological Report dated August 1993 does not include current information concerning sinkholes. The Department is aware of potential sinkhole activity near Cortez Blvd. and Sunshine Grove Road, and recent sinkhole activity in other areas of the county (e.g. Spring Hill). (62-701.300(2)(a) and (b), and 62-701.410(2)(b), F.A.C.)

16. **Hydrogeological Investigation and Groundwater Monitoring Plan.** (62-701.730(4)(b) and 62-701.730(2)(a)3., F.A.C.)

a. Please respond to Ms. Allison Amram's memorandum dated April 28, 1998, attached.

b. Engineering Report, page 3. Please provide an aerial photograph which is no more than one year old, or other appropriate plan sheet, which demonstrates that there are "no significant surface water bodies... within a mile of the site."

c. Engineering Report, page 6. Please explain the reference to a "public supply well installed on the property...." Please clarify which "well details are shown for permit #578349.08 in Attachment 8." It does not appear that well details were provided in Attachment 8.

17. **Attachment 9, Operations Plan.** (62-701.730(2)(a)4., 62-701.730(2)(c), 62-701.730(5), 62-701.730(6), 62-701.730(7), and 62-701.730(8), 62-701.730(9), and 62-701.730(18), F.A.C.)

a. Landfill Materials Control Operations, page 1. The information states, "Further inspection will occur when material is spot checked by machine operators as the materials are being spread and compacted." Please clarify if the spotters will also inspect the materials (and remove unacceptable wastes) as they are being spread and compacted.

b. Landfill Materials Control Operations, page 1. Please explain how operators and spotters will identify "asbestos containing waste regulated pursuant to 40 CFR Part 61, Subpart M."

c. Landfill Materials Control Operations, page 1. Please show the "designated holding container" on a plan sheet. Since the "designated holding container" is "for pick-up by the customer," please clarify if additional storage containers for unacceptable materials are available at the site. The information indicates that the "designated holding container" is emptied "on the average weekly." However, 62-701.730(6), F.A.C. requires that putrescible wastes shall not be stored longer than 48 hours unless an acceptable odor control plan is provided. Since an odor control plan was not provided, please revise the minimum frequency for removal of unacceptable wastes.

d. Landfill Materials Control Operations, page 2. Please provide the information required by 62-701.730(13), F.A.C., concerning the recycling activities at the site. Please specify the types of materials which will be recycled, the maximum storage quantity and time, and the storage location and method. Please provide procedures for the separation of the materials from the C&DD.

e. Landfill Materials Control Operations, page 2. Please explain how operators and spotters will identify "Hazardous wastes... which contain hazardous toxic amounts of materials such as heavy metals,.. highly corrosive materials, highly reactive materials or highly flammable materials, pursuant to Section 40, Part 261, Code of Federal Regulations."

f. Compaction of Waste, page 2. Please clarify where the waste will be "inspected and sorted." Please provide procedures for compacting and sloping the material. Please provide procedures for ensuring that the slopes are not greater than 3H:1V. Please provide a description of the sequence of filling, and show the sequence of filling on a plan sheet. Please provide an estimated schedule of filling. Since the permit will be valid for five years, please include all areas which are expected to receive waste in the next five years. Since the reserve equipment is a 966 Cat Loader, please explain how a rubber-tired front loader will adequately compact the materials.

(Comment #17, cont'd)

- g. Stormwater Controls, page 3. Please show details for the "swale near the center of the fill area" on a plan sheet. Sheet S1 does not appear to include sufficient detail. Please provide procedures for the management of ponded water at the toe of the slope within the active cell.
- h. Stormwater Controls, page 3. Please clarify the lowest elevation of the excavation. This Section indicates the elevation is +41 feet NGVD, but Sheet S1 indicates that the bottom elevation is +45 feet NGVD. See also Comment #17.j., below.
- i. Stormwater Controls, page 3. Please clarify the reference to a two-foot berm. Sheet S1 does not appear to show a berm. Since it is not clear if the waste will be disposed directly adjacent to the stormwater management system, please explain the methods or procedures which will be used to minimize stormwater infiltration into the waste and/or leachate seepage into the stormwater management system.
- j. Groundwater, page 3. The information states, "the seasonal high groundwater table has been determined to be approximately 34 feet NGVD from an existing monitoring well located at the west side of the landfill." However, the Subsurface Soil Exploration dated August 25, 1993, prepared by CTL (which was referenced in this application) indicates that seasonal high water level is estimated to be between +45 and +46 feet NGVD for the "proposed borrow area" (which includes portions of Phase 1) and between +50 and +55 feet NGVD for the remainder of the site. Please clarify this discrepancy, and explain how the facility will not violate the prohibition of Rule 62-701.300(2)(f), F.A.C. If the information in the CTL report is no longer valid, please review the referenced document and specifically list and affirm which information is still valid.
- k. Landfill Phasing and Closure, page 3. Please show the "treed area" on a plan sheet.
- l. Landfill Phasing and Closure, page 4. Please provide a topographic survey which shows the "natural land surface."
- m. Landfill Equipment, page 4. Please provide a list of all equipment which is available for use at the site for landfilling activities.
- n. Training, page 4. Please provide a list of all trained spotters and operators, and copies of their training certificates. Please provide a typical work schedule which demonstrates that a trained operator or spotter is at the site at all times when the facility is operating.

(Comment #17, cont'd)

o. Access Control, page 4. Please show the access control devices on the Site Plan. Please describe the measures used to control access at the site. Please provide a copy of any signs which are posted at the entrance of the site.

p. Odor Control, page 5. Please provide a detailed Odor Control Plan. The Odor Control plan must include, at a minimum, procedures and minimum frequency for assessing odor on and off site, methods used to prevent and minimize odors, and criteria for implementing the odor control plan. Please provide procedures for controlling litter.

q. Water Pollution Control, page 5. Please explain the purpose of this Section. Please clarify which "previously known or discovered well[s]" are expected to be encountered during filling operations. See also Comments #17.h. and #17.j., above.

r. Vermin Control, page 5. Please provide procedures for controlling vectors (e.g. insects, rats, birds, other animals) at the site.

s. Long-Term Care, page 6. See Comment #12.b., above.

t. Contingency Plan.

1) Equipment Failure, page 7. Please specify the maximum downtime for equipment before sufficient reserve equipment will be operating at the site.

2) Landfill Shutdown, page 7. Please describe the conditions which would cause the landfill to shut down. Please specify to which "other landfills" customers will be re-directed in the event of a landfill shutdown.

3) Fire control, pages 7-8. Please provide waste handling procedures in the event of a fire or natural disaster. In the event that "the fire cannot be controlled using on-site equipment", please specify the maximum time before County fire equipment will be requested. Please provide the location (and distance) of the nearest fire station and fire hydrant.

18. **Financial Assurance.** (62-701.320(11), F.A.C.) Please respond to the Department's letter dated April 28, 1998 (sent under separate cover) concerning this item.

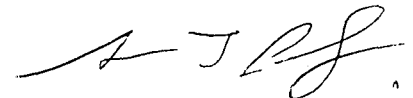
The following comment is for information only, at this time, and does not require an immediate response:

1. Please be advised that the Department will only authorize the operation of those areas which are expected to receive waste within the five-year permit period. Future Phases or Cells will not be authorized, at this time.

"NOTICE! Pursuant to the provisions of Section 120.60, F.S. if the Department does not receive a complete response to this request for information within 30 days of the date of this letter, the Department may issue a final order denying your application. You need to respond within 30 days after the date of this letter, 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 30 days to develop, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of a timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

You are requested to submit your response to this letter together, as one complete package. If there are points which must be discussed and resolved, please contact me at (813) 744-6100 ext. 386.

Sincerely,



Susan J. Pelz, P.E.
Solid Waste Section
Southwest District

sjp

Attachments

cc: Charles Rodriguez, P.E., EEC, 5119 N. Florida Ave., Tampa, Fl. 33603
Lawrence Jennings, Hernando County, 20 N. Main St., Room 262,
Brooksville, Fl. 34601
f3 Robert Butera, P.E., FDEP Tampa
Allison Amram, P.G., FDEP Tampa

62-103.150 Public Notice of Application and Proposed Agency Action

(1) Each person who files an application for a Department permit may publish, or may be required to publish, and provide proof of publication to the Department, at his own expense, a Notice of Application in a newspaper of general circulation in the county in which the activity will be located or take place. Publication of a Notice of Application shall be required for those projects which, because of their size, potential effect on the environment or natural resources, controversial nature, or location, are reasonably expected by the Department to result in a heightened public concern or likelihood of request for administrative proceedings. If required, the notice shall be published one time only within fourteen (14) days after a complete application is filed and shall contain:

- (a) name of applicant, a brief description of the project and its location;
- (b) where the application file is located and when it is available for public inspection;
- (c) 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

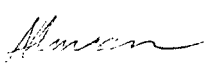
The Department announces the receipt of an application for permit from W. Clyde Daniel Construction, Inc., Mr. W. Michael Daniel, President, for construction/operation of a construction and demolition debris disposal facility, subject to Department rules, located at 9450 Sunshine Grove Road in Brooksville, Hernando 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, 3804 Coconut Palm Drive, Tampa, Florida 33619-8318.

Memorandum

Florida Department of Environmental Protection

TO: Susan Pelz, P.E.

FROM: Allison Amram, P.G. 

SUBJECT: Sunshine Grove Road Construction & Demolition Debris Landfill
Permit Renewal application dated March 30, 1998
Pending Permit No. 22886-001-SO, Hernando County

DATE: April 28, 1998

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I have reviewed the Hydrogeological Investigation and Groundwater Monitoring Plan sections of the March 30, 1998 permit application for the Sunshine Grove Road Construction & Demolition Debris Landfill. Although the permit application states that the site is a C&D Recycling facility *only*, supporting information states that C&D *disposal* occurs at the site. For this reason, the application was reviewed for compliance with the C&D disposal requirements listed in F.A.C. Rule 62-701.730.

In order for the FDEP to review the ground water monitoring plan, the following information is required:

1. **Hydrogeologic Investigation.** The C&D application was reviewed, as well as the August 1993 Geological Report for information required by F.A.C. Rule 62-701.410(1). Please provide data to meet the following requirements: F.A.C. Rule 62-701.410(1)(a)1-4.
2. **Existing Well Data.** Please provide the following well construction information for the shallow well, as it is proposed to be monitored for field parameters: Well screen slot size, well seal type and thickness.
3. **Prohibitions.** Please note that the prohibitions of Rule 62-701.300 require a 500 foot setback from potable wells; this includes the on-site potable well. The well may be retained for non-potable uses if it is reclassified as a non-potable well with the Health Department and the Southwest Florida Water Management District, or the well may be kept for potable uses as long as the proposed C&D disposal area is modified to provide the 500 foot setback. Is this the only potable well located within 500 feet of the proposed disposal area? The wording in the "Well Search" section was confusing.
4. **Monitoring Well Locations.** Well locations are required to be within 50 feet of the edge of the disposal cell. The proposed upgradient location for well MW-3 is acceptable, but the downgradient wells need to be located within 50 feet of the Phase 1 disposal area in order to be useful for detecting possible ground water contaminants originating from the landfill. Please provide revised downgradient well locations on a scaled site map.
5. **Monitoring Well Construction.** Please provide a boring log for the entire drilled length of the wells, not just intermittent samples, as there is not much site boring data available.
6. **Sampling Parameters.** Periodic sampling of the detection and background wells at the site shall be for the parameters listed in F.A.C. Rule 62-701.730(4)(b)4, and other parameters depending on the results of the initial sampling. Just prior to permit renewal (the year 2003), all site wells are required by F.A.C. Rule 62-701.730(4)(b)5 to be sampled for the parameters listed in F.A.C. Rule 62-701.510(8)(a).

7. **Sampling Frequency.** The sampling frequency will be evaluated when the slug test data of the proposed wells is provided. Semi-annual sampling frequency is a *minimum*, based on site-specific conditions.
8. **Surface Water Monitoring.** Is surface water monitoring necessary at the site? F.A.C. Rule 62-701.730(4)(b)2 requires sampling if the stormwater system discharges to surface waters.
9. **Water Quality Reporting.** Reporting of the ground water results will be required at the same frequency as the sampling.

If the applicant has questions, I can be available to meet with them to discuss these issues, or they may contact me at 813/744-6100, ext. 336.

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