



# Florida Department of Environmental Protection

Central District  
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January 18, 2011

**VIA ELECTRONIC MAIL**

lmarion@co.volusia.fl.us

Mr. Leonard Marion  
Volusia County Solid Waste Services  
3151 East State Road 44  
Deland, FL 32724-6409

OCD-SW-11-018

Volusia County - SW  
Tomoka Farms Road Landfill WACS #27540  
DEP Review of "Response to Review of Evaluation Monitoring  
Plan and Related Documents, dated 1/6/2011"

Dear Mr. Marion:

HDR submitted the following document on your behalf:

Report	Report Date	Signed and Sealed Date	DEP Received Date
"Response to Review of Evaluation Monitoring Plan and Related Documents"	1/6/2011	1/6/2011	1/7/2011

The Department's detailed review comments are in Attachment I. Within 30 days please provide a response to Attachment I.

You may contact Marjorie Heidorn by e-mail at marjorie.heidorn@dep.state.fl.us or phone at (407) 893-3320 with questions about this letter.

Sincerely,

F. Thomas Lubozynski, P.E.  
Waste Program Administrator

cc:

Jennifer Stirk, Volusia County, jstirk@co.volusia.fl.us  
Chet Purves, Volusia County, cpurves@co.volusia.fl.us  
Pat McCormack, Volusia County, pmccormack@co.volusia.fl.us  
John Locklear, HDR, john.locklear@hdrinc.com

**Attachment I: DEP Review Comments to submittal "Response to Review of Evaluation Monitoring Plan and Related Documents," dated January 6, 2011.**

Text from the submittal is in quotes and *italic type*; DEP comments are in standard type. The item numbers are the same as the January 6, 2011 submittal:

1. Submittal of the Contamination Evaluation Report (CER).

The Department accepts that the CER will be submitted by April 7, 2011. The report must be signed and sealed by either a professional geologist or professional engineer. By April 7, 2011, the facility will have:

- a. Installed the proposed Benzene and Ammonia Evaluation Monitoring (EM) wells.
- b. Done an initial sample on the 6 new wells.
- c. Conducted a potable well survey.
- d. Submitted the Contamination Evaluation Report (CER) which includes the results of the potable well survey.

2. The targeted locations for the 6 new wells:

- a. The Department approves the proposed locations of the 6 evaluation monitoring wells including the adjusted locations of B78-1 and B80-2.
- b. Please revise and resubmit Sheet C-01 to include the location of B77-1.

3. Submittal of 2009-2010 Evaluation Monitoring Sampling Data.

- a. The Department understands that the November 2009 data is still being worked on for an ADaPT submittal.
  - i. When is this data expected to be successfully submitted in ADaPT to our Tallahassee office?
  - ii. Of particular interest are the November 2009 leachate results including metals which are not currently shown in WACS. Please submit the results for the metals analysis of the leachate sample(s).

- b. The Department requested ADaPT submittals for any quarterly sampling in February 2010 and August 2010. The response stated:

*"ADaPT submittals for the February 2010 and August 2010 quarterly sampling events are included on the CD provided in Attachment 2. Appendix II data is not included as discussed in the response to Comment 4 below."*

This gives the impression that the submitted CD does not have Appendix II analytical results for either February or August 2010. The CD in the 1/6/2011 submittal does include Appendix II analytical results for the February 2010

sampling. This is consistent with the table in the submittal's Comment 4 (reproduced below).

- c. ADaPT submittals for the Appendix II sampling in May 2010.

Comment 3.c. stated:

*"ADaPT submittals for the May 2010 quarterly sampling event are included on the CD provided in Attachment 2. Appendix II data is not included as discussed in the response to Comment 4 below."*

"Comment 4" states:

*"...Appendix II parameters were inadvertently omitted from the analyses performed for three of the five quarterly monitoring events. A summary of the events is provided below:*

<b>Event</b>	<b>Date</b>	<b>Appendix II</b>
<b>2009 Q4/S2</b>	<b>November 2009</b>	<b>Yes</b>
<b>2010 Q1/S1</b>	<b>February 2010</b>	<b>Yes</b>
<b>2010 Q2</b>	<b>May 2010</b>	<b>No</b>
<b>2010 Q3</b>	<b>August 2010</b>	<b>No</b>
<b>2010 Q4</b>	<b>November 2010</b>	<b>No</b>

- i. As required by the MPIS for the facility, the May 2010 sampling is considered the first semi-annual sampling event for 2010. The February 2010 samples are a quarterly sampling event only. The November 2010 sampling event should have been the second semi-annual sampling event in addition to the 4<sup>th</sup> quarterly event. Please clarify, correct, and resubmit the table in Comment 4, if appropriate. (Also, "Appendix" is misspelled.)
- ii. The table notes that Appendix II was not done for the May 2010 sampling event. However, the submittal "Ammonia Contamination Evaluation Plan," dated 9/29/2010, included the laboratory results for Appendix II analysis for the Benzene wells for the May 2010 sampling event. (The Benzene evaluation monitoring wells were B41-1, B43-1, B45-1, and B45-2.). Please clarify, correct, and resubmit the above table if appropriate.
- iii. According to the submittal the May 2010 quarterly sampling event was included on the compact disk (CD) provided with the 1/6/2011 submittal. The Department's copy of the CD in Attachment 2 does not include any May 2010 sampling results. However, the results for the May 2010 sampling event had been included in the submittal "Ammonia Contamination Evaluation Plan," dated 9/29/2010. Did the 9/29/2010 submittal have all the laboratory data for the May 2010 sampling event?

(1) If no, submit all of the May 2010 data to the Central District on CD.

- (2) Also, submit the additional data in ADaPT format to Tallahassee for uploading into the WACS database.
    - iv. The routine semi-annual May 2010 sampling data was submitted; it has been uploaded into WACS. However, the WACS data does not include the Appendix II results.
      - (1) Submit all of the previously un-submitted Evaluation Monitoring sampling data to Tallahassee in ADaPT format to upload to the WACS database. Use ADaPT Report Type "ASSMT" for any sampling that is different from what would be required for routine semi-annual sampling.
      - (2) Describe the additional data submitted to Tallahassee in your response to this letter, that is, sampling date, sampling locations, and analytical parameters.
4. Reducing EM Parameters in the Benzene monitoring wells.
  - a. The 1/6/2011 submittal stated:

*"A table of all parameters reported above the laboratory detection limit for the Appendix II analyses is provided in Attachment 3. As shown in the table, all parameters detected are included in the Appendix I analyte list. However, it appears warranted to analyze for Appendix II parameters during the first quarterly event of 2011 since no data is available since February 2010. Following review Q of the 2011 Q1 data, we will submit a request to reduce the parameter list if the data warrants such a recommendation. "*

    - i. Cyanide and pentachlorophenol are on the Attachment 3 table of detected parameters but are not on the Appendix I list for routine semi-annual sampling. Please discuss why these parameters were not noted.
    - ii. The May 2010 Appendix II sampling in monitoring well B41-1 detected an exceedance of bis (2-Ethylhexyl) phthalate (17 ug/L). Monitoring well B43-1 had an exceedance of bis (2-Ethylhexyl) phthalate (14 ug/L). The water quality standard is 6 ug/L. Why was this parameter not listed on the table in Attachment 3? If appropriate, revise and resubmit the Attachment 3 table.
  - b. The Department agrees that any request to reduce analytical parameters depends upon the results of the February 2011 sampling event.