



Florida Department of Environmental Protection

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Rick Scott
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Jennifer Carroll
 Lt. Governor

Mimi Drew
 Secretary

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-11-019

Volusia County – SW
 Tomoka Farms Road Landfill WACS #27540
DEP Review of Technical Memorandum titled “Results of Analytical Testing Associated with the Discharge of Treated Leachate at the Tomoka Farms Road Landfill on November 9, 2010”

Dear Mr. Marion:

S2Li submitted the following document on your behalf:

Report	Report Date	Signed and Sealed Date	DEP Received Date
Technical Memorandum--Results of Analytical Testing Associated with the Discharge of Treated Leachate at the Tomoka Farms Road Landfill on November 9, 2010	12/20/2010	--	12/23/2010

The Department has the following comments:

1. The Technical Memorandum was addressed to you. It was submitted to the Department. Since the Memorandum was not signed and sealed by either a Professional Geologist or Professional Engineer, the Department cannot accept it as a final submittal.
2. Although all samples were from surface waters, a different parameter suite was requested for the Interior and Exterior samples versus the Background sample. Why? Please specifically address:
 - a. The detection limits for mercury, that is, 0.00013 ug/L versus 0.10 ug/L.
 - b. The reported values for ammonia. For the background sample the result was reported as “Nitrogen, Ammonia (Unionized)” with an MDL of 0.020 mg/L. The

Exterior and Interior samples results were reported as "Nitrogen, Ammonia," with an MDL of 0.020 mg/L. Was "Nitrogen, Ammonia (un-ionized)," reported in mg/L as NH₃, the actual analysis accomplished on the background surface water sample?

3. The Class III fresh surface water criteria level for mercury is 0.012 ug/L. The Interior and Exterior samples had a minimum detection limit of 0.10 ug/L for mercury. What is the basis for concluding that mercury contamination did not occur?
4. The Class III fresh surface water criteria level for "Ammonia (un-ionized)" is ≤ 0.02 mg/L as NH₃. What is the basis for concluding that ammonia contamination did not occur?
5. Should the contingency plan at the Landfill be changed based upon this event?
 - a. What actions should be repeated for any leachate spill? Which actions should not be done?
 - b. What sampling and analysis should be conducted? The Department believes that any surface water which may be impacted by a treated or untreated leachate release should be sampled for the following parameters. What is your opinion?
 - Appendix II
 - Unionized Ammonia in mg/L as NH₃
 - Low, Level Mercury (MDL ≤ 0.012 ug/L)
 - Total Nitrogen
 - Phosphorus
6. Anticipating a satisfactory answer to Comments 3 and 4 above, the Department can accept the conclusion stated in the Technical Memorandum. The prompt actions by Volusia County ensured that the surface water quality adjacent to the landfill was not degraded as a result of the accidental release of treated leachate.

In order to close out the Incident Report, please accomplish the following within 21 days of receipt of this letter.

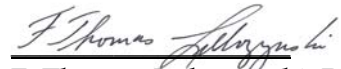
- A. Provide a final report that is signed and sealed by an appropriate professional. The report must address the above comments.
- B. Submit the laboratory and field sampling data to Tallahassee in ADaPT format using the following codes:

MW Testsite Name	WACS #	Location of SW	ADaPT Report Code
SW-12	19799	Background North Pond	ASSMT
SW-INB	15400	Interior to Boom North Pond	ASSMT
SW-EXB	15401	Exterior to Boom North Pond	ASSMT

Mr. Leonard Marion
Page 3 of 3
January 18, 2011
OCD-SW-11-019

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:

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