



Florida Department of Environmental Protection

Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590

527545

MB

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 19, 200¹⁰~~9~~

Mr. R.D. McConnell
Area Vice President
Trail Ridge Landfill, Inc.
5110 U.S. Highway 301
Baldwin, Florida 32234

**Re: Trail Ridge Landfill
WACS I.D. Number: NED/16/00033628
Minor Modification Application of the Class I Landfill Permit
FDEP File Number 0013493-018
Request for Additional Information
Duval County - Solid Waste Permitting**

Dear Mr. McConnell:

The Florida Department of Environmental Protection (DEP) has reviewed the above-referenced permit application, dated and received on February 18, 2010. The following reviews are enclosed:

Attachment 1, Review Memorandum dated March 19, 2010, prepared by Michael Bogin.
Attachment 2, Review Memorandum, dated March 18, 2010, prepared by Richard Rachal, P.G.

The information requested in these reviews is required for DEP to continue processing your permit application. Please provide the requested information by May 4, 2010. Action on the application will be delayed until the requested information is received in this office. Please reference the associated DEP file number and WACS I.D. number on all written correspondence concerning this project. If you have any comments about this matter, please contact Michael Bogin at the letterhead address, at e-mail Michael.Bogin@dep.state.fl.us, or telephone number 904.807.3355.

Sincerely,

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

ECR:mb:cs
Enclosure

cc: Juanitta Bader Clem, P.E. - England, Thims, and Miller, Inc.
"More Protection, Less Process"
www.dep.state.fl.us

Florida Department of Environmental Protection

Memorandum

TO: Files

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

FROM: Michael Bogin *MB*
Solid Waste Engineer

DATE: March 19, 2010

SUBJECT: Trail Ridge Landfill
WACS I.D. Number: NED/16/00033628
Minor Modification Application of the Class I Landfill Permit
FDEP File Number 0013493-018
Request for Additional Information
Duval County - Solid Waste Permitting

The Florida Department of Environmental Protection (DEP) has reviewed the above-referenced permit application dated and received February 18, 2010. The following are comments and/or requests for additional information:

In responding to this request for additional information (RAI) if one response modifies a section of the Operations Plan or the Contingency Plan and Emergency Procedures Plan, the respective section(s) should be modified accordingly. A revised, completed version of the plans that includes all revisions made in responding to this RAI should be attached. To enable DEP to view changes to the plan, all additions should be underlined (e.g., added) and all deletions should be struck through (e.g., ~~deleted~~). By this method, DEP hopes to have one final version of the respective plans that includes all revisions made during this permitting process.

1. DEP agrees to revise Specific Condition No. 10.
2. Since the applicant has proposed to decrease the minimally required number of personnel, please demonstrate that the Trail Ridge Landfill (Facility) can properly manage waste with fewer spotters.
 - a. Item 3 of the submittal requests that the width of the working face be increased from 200 to 300 feet in order to allow the Facility to accommodate 25 trucks/truckloads with an approximate width of 12 feet during peak hours of operation. Please demonstrate the time it will take for the equipment operator/spotter to inspect each load of waste for unauthorized material, remove unauthorized waste or call someone else to remove it, as well as to

spread and compact waste while taking into consideration the limited per vehicle space utilized for waste disposal and the limited amount of personnel (i.e., Specific Condition 17 presently requires a minimum total of nine people during the peak times, but the Application is proposing a minimum total of eight people).

- b. Please specify in the Operation Plan the location(s) of the spotters and laborers, the manner in which the waste will be inspected (e.g., while it is being discharged, as it is being spread, after it has been spread out, and prior to compaction) and the specific procedures to be followed if unauthorized waste is discovered. Also, address when and the manner in which waste will be spread out, and note that the Rule 62-701.320(15)(d)2.a F.A.C., requires each load of waste to be visually inspected prior to being compacted, which means it must be inspected prior to being spread by a compactor. Finally, please note that spotters shall be stationed where they can inspect each shipment of waste for unauthorized waste.
- c. Since the Facility requests to use some equipment operators as spotters are to be located on heavy equipment spreading the waste at the working face, please specifically address in the Operation Plan the following:
 - (1) The heavy equipment operator shall be trained as an operator or spotter;
 - (2) When unauthorized waste is discovered, the heavy equipment operator must either move the unauthorized waste away from the active area for later removal and proper management, or must stop operation and notify another person on the ground or on other equipment who will immediately come to the active area and remove the unauthorized waste before operations are resumed; and
 - (3) That all interim spotters must be under the direct supervision of a trained operator or a trained spotter. Also, indicate the maximum allowed separation (i.e., the maximum distance, line of sight, etc.) between interim spotters and the trained operators or trained spotters under whose direct supervision they operate.

Additionally, the submittal asks that Specific Condition No. 12 be changed to say that waste shall be "thoroughly" inspected prior to compaction instead of being "completely" inspected prior to compaction. Please note, since the newly revised version of F.A.C., Chapter 62-701 allows equipment operators to serve as spotters,

we will replace the word "completely" with the word "visually" in order to be in accordance with the revised Chapter.

3. The request is to increase the width of the working face from 200 to 300 feet in order to simultaneously accommodate 25 trucks/truckloads, but has not proposed a similar decrease in the length of the working face. This would have the effect of increasing the size of the working face from 60,000 to 90,000 square feet. Please demonstrate that the Facility has a need to accommodate that number of trucks/truckloads by indicating the typical number of loads deposited on the maximum day of the week and by breaking that number down to the hour. Also, use the maximum allowable waste acceptance rate, the typical in-place waste density and the Facility's permitted lift height to demonstrate that the Facility needs a 90,000 square foot working face.

Additionally, please indicate what is meant by and give examples of "adverse or extenuating circumstances" and note that any increase in the maximum size of the working face may only be done with DEP's concurrence at the time.

4. Please see Comment No. 3.
5. DEP agrees to revise Specific Condition No. 15.
6. Please see Comment No. 2.
7. Please note, depending on both the constituent of concern and on other variables, DEP may be willing to approve the use of contaminated soils for initial cover even if it exceeds the commercial/industrial exposure levels because that potential exposure would be for a maximum of six months (i.e., until intermediate cover would be required). DEP therefore proposes the following language to replace the third sentence of Specific Condition No. 22:

If the analytical results indicate that the material is not hazardous waste, the material may be disposed of in the landfill. If the analytical results are above the commercial/industrial exposure levels of F.A.C., Chapter 62-777, then depending upon the contaminant of concern, the material may be utilized as initial cover on interior side slopes only, with DEP's written approval on a case-by-case basis. If the analytical results are below the commercial/industrial exposure levels of F.A.C., Chapter 62-777 then the material may be utilized as initial cover on interior side slopes only without case-specific approval from DEP.

8. DEP agrees to revise Specific Condition No. 30.

Trail Ridge Landfill

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9. DEP agrees to revise Specific Condition No. 33.
10. DEP agrees to revise Specific Condition No. 37.
11. Please see Richard Rachal's attached memorandum.
12.
 - a. DEP agrees to revise Subsection b.2 of Specific Condition No. 47.
 - b. DEP also agrees to revise Subsection c.2 of Specific Condition No. 47 with the following caveat: Instead of defining a major storm event as being "in excess of an inch of rainfall," DEP will agree to define it as being "one or more inches of rainfall."

ECR:mb:cs

Florida Department of

Environmental Protection

Memorandum

TO: Michael Bogin *MB*
 Solid Waste Section

Emerson Raulerson, P.E. *ER*
 Solid Waste Section Supervisor

FROM: Richard S. Rachal, P.G. *RSR*
 Waste Cleanup Section Supervisor

DATE: March 18, 2010

SUBJECT: Minor Permit Modification Application
 Review Of Application
 Trail Ridge Landfill, Jacksonville, Florida
 Duval County, Florida

I have reviewed the application including the itemized modifications requested in the letter submittal by England-Thims & Miller, Inc. received February 18, 2010. The modification requested to Specific Condition No. 46, Surface Water Monitoring – Subsection e. appears somewhat unclear. I recommend the revised language read “The Permittee shall ensure surface water samples shall not exceed applicable surface water standards.” Alternatively surface water sample locations could be proposed for adjustment such that they only sampled discharges.

RSR:CS