

MIAMI-DADE COUNTY, FLORIDA



ENVIRONMENTAL RESOURCES MANAGEMENT
POLLUTION CONTROL DIVISION
33 S.W. 2nd AVENUE
SUITE 800
MIAMI, FLORIDA 33130-1540
(305) 372-6817

August 7, 2002

Bruce Henderson
City of Miami Beach
1700 Convention Center Dr., 4 Floor
Miami Beach, Florida 33139

CERTIFIED MAIL NO. 7000 0600 0026 0728 5265
RETURN RECEIPT REQUESTED

RE: Additional information for an Alternate Procedure request dated July 24, 2002 for FDEP File Number 00180254-001-SC (WACS# SED/13/00088893) submitted by Metcalf & Eddy, Inc. for the proposed City of Miami Beach Waste Processing Facility (WPF) located at, near, or in the vicinity of 2800 North Meridian Avenue, Miami Beach, Florida (SW-1360).

Dear Mr. Henderson:

The Pollution Remediation Section (PRS) of the Department of Environmental Resources Management (DERM) received the referenced additional information for an Alternative Procedure request on July 29, 2002. The information was submitted in response to the DERM Request for Information (RAI) letter dated July 3, 2002. The referenced additional information contains a revised groundwater-monitoring plan that partially addresses the items in the 07/03/02 RAI. However, in order to complete review of your application pursuant to Section 403.087(4), Florida Statutes (F.S.), Sections 62-701, and 62-4.070(1), Florida Administrative Code (F.A.C.), please provide the following information:

REQUEST FOR ADDITIONAL INFORMATION

1. The type of waste accepted is the basis for the alternative procedure request. The control for the types of wastes accepted is dependent on the waste transporters and the trained facility staff. The facility will need to ensure that there are clear written instructions for the users of the facility and consequences for non-compliance. Additionally, the facility staff will need to be vigilant in inspecting incoming material prior to and immediately after tipping on the concrete slab. Nevertheless, it is acknowledged that some "unsuitable material" may be inadvertently accepted. Therefore, the proposed isolation valve in the drainage system is a practical "safety" feature. Two modifications for the safety valve system must be implemented:
 - A. Locate the valve on the outlet side of the interceptor tank to provide more storage of stormwater. The capacity of this portion of the stormwater system should be reevaluated for design purposes.
 - B. Design the valve to be in normally closed position until facility staff can visually inspect the stored stormwater.

2. In order to confirm that there are no impacts due to the proposed alternative for leachate control, a monitoring program will be required as follows:
 - A. A daily inspection program of the collected water in the interceptor tank is required. Based on the results of the visual inspection, collected water shall be properly disposed. A contingency disposal plan shall be provided in the event that the inspection indicates that the collected water is not clean stormwater. A log shall be maintained on-site, documenting the results of the daily inspections.
 - B. Propose a stormwater sampling program that will include periodic sampling of the collected stormwater in the interceptor tank to ensure that only clean stormwater is discharged into the stormwater system. Be advised that DERM is also collecting stormwater samples from similar existing solid waste facilities in Miami-Dade County, which will be used in the evaluation of the referenced proposal and for future comparison purposes.
 - C. A modified groundwater-monitoring plan was submitted that included a proposed monitoring well between the facility and the adjacent body of water, and a monitoring well near the stormwater drainage well (with screened interval at the same depth as the drainage well, approximately 80 feet below grade). Additionally, baseline parameters listed in 62-701.510(6)(b), FAC, with the addition of sulfate, aluminum, and phenols for all five wells were proposed. The well locations and parameters are acceptable. However, it is necessary to install and sample the proposed shallow well between the facility and the adjacent pond at this time. This information will be used to determine if there are any present impacts from the ongoing solid waste operations as well as be used to determine if an alternate buffer distance from the adjacent body of water is acceptable (< 200 feet). A low flow purging and sampling technique must be used when sampling for metals (<1 Liter/min). Chain of custody, original laboratory records, summary of sampling and quality assurance protocol and resultant data as well as a project map with sampling locations, shall accompany the data submittal. The other proposed monitoring wells may be installed and sampled prior to the commencement of the permitted operations.
 - D. The June 5, 2002 submittal included a summary of the results from two soil borings on or adjacent to the proposed project. The summary indicated that analyses for total and SPLP arsenic were detected above applicable criteria at certain intervals. Therefore, it is required that these exceedances be evaluated (if not already addressed in a DERM-approved document) regarding the proposed protection for human health and groundwater resources. Chain of custody, original laboratory records, summary of soil sampling and quality assurance protocol and resultant data, as well as a project map with sampling locations and land use, shall accompany the next submittal. Note that all data shall be reported in a dry weight basis.
3. DERM has previously approved, in a letter dated April 24, 2002 (with a copy to FDEP), the revised cost estimate dated March 25, 2002 for \$5,669 for closure of the referenced facility. Therefore, in accordance with Rule 62-701.710 (7), F.A.C., provide the Florida Department of Environmental Protection with proof of financial assurance issued in favor of the State of Florida in the amount of the closing and long-term care cost estimates for the facility in the amount specified above. Said proof shall be mailed to the address below with a copy provided to the DERM PRS.

Bruce Henderson
City of Miami Beach
FDEP file #0180254-001-SC (SW-1360)
8/7/2002
Page 3 of 3

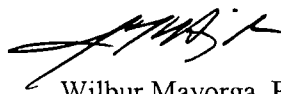
Florida Department of Environmental Protection
Financial Coordinator - Solid Waste Section
Twin Towers Office Building
2600 Blair Stone Road, MS 4565
Tallahassee, Florida 32399-2400

The Department must be notified in writing at least fourteen (14) days prior to any sampling event so that DERM, if desired, may observe the sampling or collect split samples. The consultant collecting the samples must perform field-sampling work in accordance with the Standard Operating Procedures (SOP) provided in FDEP Guidelines for RSM Management, Appendix B. The laboratory analyzing the samples must perform laboratory analyses pursuant to the National Environmental Laboratory Accreditation Program (NELAP) certification requirements. If the data submitted exhibits a substantial variance from the DERM split sample analysis, a complete resampling using two independent certified laboratories will be required.

Evaluation of your proposed project will continue to be delayed until all requested information has been received. Please respond to the aforementioned items in this Request for Additional Information within thirty (30) days of receipt of this letter. Note that all submittals must be signed and sealed by a professional engineer licensed in the state of Florida. Submittals shall be made under one cover and shall be comprised of three copies and one original.

If you have any questions, please contact Mr. Robert E. Johns at telephone number 305-372-6804. When referring to this project, please use the file number 09507/SW-1360.

Sincerely,



Wilbur Mayorga, P.E., Chief
Pollution Remediation Section
POLLUTION CONTROL DIVISION

REJ/bj

cc: M. Flagler, DERM
I. Sznol, DERM
F. Verrire, DERM
O.J. Carlo, FDEP
F. Wick, FDEP
I. Jagnerine, FDEP
S. Starke/R. Ulkus, M&E
P. Calas, Attny.
DERM File # 9507/(SW#1360)