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April 25, 2012

E-Mail
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Mr. Mike Kaiser
Omni Waste of Osceola County, LLC
1501 Omni Way
St. Cloud, Florida 34773

OCD-SW-12-167

Osceola County – SW WACS # 89544
J.E.D. Solid Waste Management Facility
Class I – Cell 8 Construction
Review of Certification of Construction Report

Dear Mr. Kaiser:

Weaver Boos Consultants Southeast, LLC., submitted on your behalf the Certification of Construction Completion of a Solid Waste Management Facility form 62-701.900(2) and the Report titled "J.E.D. Solid Waste Management Facility, Construction Quality Assurance Certification Report, Construction of Cell 8." The Report was dated March 30, 2012. The cover letter transmitting the Report was dated April 9, 2012. The Certification form was signed and sealed on April 9, 2012. The package was received by the Department on April 11, 2012.

The Department has completed the review of the Report and has the following comments:

1. The As-Built Drawings submitted as part of the Report have callouts which refer to notes. For example, Drawing No. 185, sheet 1 states SEE NOTE 2. Are the callouts relevant to the as-built information? If yes, submit a copy of the notes referenced in the As-Built Drawings. Or, were they part of the originally submitted drawings but do not have information important for the as-built submittal.

2. Appendix P is a table of the repairs performed on the 60-mil Textured HDPE liner. The table column titled "Description (Repair Type)" lists different types of

repairs made to the liner. Provide the Department with a definition for the types of repairs listed as DS and DP on the table.

3. Page 40 of the Report states that the transmissivity of the secondary geocomposite was measured sandwiched between a GCL (Bentomat ST) and a 60-mil HDPE textured geomembrane. Why was this configuration chosen? This configuration is only used in the sump area. The configuration in the majority of the Cell 8 liner system has the secondary geocomposite sandwiched between the secondary 60-mil HDPE liner and the primary 60-mil textured HDPE liner.

4. The geonet used in the primary geocomposite drainage layer was Transnet 330-2-8. The geonet used in the secondary geocomposite drainage layer was Transnet 270-2-8. How were the two types of geocomposites differentiated to ensure the correct geonet was placed in the correct layer?

5. Page 25 of the Report states "A sacrificial geomembrane panel was then extrude welded to the primary geomembrane liner at the crest point of the anchor trench and extended to the outer slope of the intercell berm (daylighted). The primary geocomposite was extended over the top of the sacrificial geomembrane and also daylighted at the outer slope of the intercell berm. This method of termination of the primary geocomposite will reduce migration of landfill gas into the intercell berm soils …"
    a. This is a significant deviation from the permitted design of the intercell anchor trench. Resubmit the DEP Certification of Construction Completion of a Solid Waste Management Facility form 62-701.900(2) and detail this change under 'Deviations from Plans and Application Approved by DEP.'
    b. The Department understands the intercell anchor trench design change (that is, primary geocomposite daylighting along the outer slope of the intercell berm) was made to create a vent pathway for landfill gas thus reducing the possibility of landfill gas migration into the intercell berm. Is this interpretation correct?
    c. Before the Solid Waste Program can approve the construction certification for Cell 8, we need assurance the new intercell anchor trench design does not violate the site's air permit. Consult with the Air Program to determine if the altered design of the intercell anchor trench meets the requirements of the site's air permit.
    d. The site is currently under a Gas Migration Plan for the migration of landfill gas in soil. Regardless of which intercell trench design is ultimately used on Cell 8, the permitted design or the daylighting of the primary geocomposite design, the Department requests a discussion of the intercell trench design and its effect on landfill gas migration.

After consulting with the Air Program, contact Kim Rush to set up a meeting to discuss the Gas Migration Plan, on-going corrective actions, and the anchor trench designs. (The design for the end trenches has the primary geocomposite cut-off before the anchor trench but not sealed; the design change for the intercell trench is to daylight the primary geocomposite.)

6. On page 49 of the report, tests on the sump pumps and control panel which need to be performed prior to waste being filled into Cell 8 are outlined. Ensure the test results become a part of the operation record for the facility.

7. Please provide panel layout drawings for the installation of the primary and secondary geomembrane layers.

The April 9, 2012 cover letter requested a site inspection be scheduled. On March 22, 2012 a site visit was conducted by a Department Representative to inspect the Cell 8 construction project. Therefore, another site inspection is not necessary.

Please submit your response to the items above within 15 days of receipt of this letter. If you have any questions, please contact Kim Rush at (407) 897-4314 or by e-mail at kim.rush@dep.state.fl.us.

Sincerely,

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

FTL/kr

cc:
Jeffrey D. Schaffer, P.E. – Weaver Boos Consultants Southeast, LLC, jschaffer@weaverboos.com
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