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August 30, 1993

Mrs. Mary Nogas
Department of Environmental Protection
7825 Baymeadows Way
Jacksonville, FL 32256-7577

RECEIVED
SEP 7 1993
EA, SOLID WASTE

RE: Trail Ridge Sanitary Landfill
Rosemary Hill Landfill

SC16-184444

Dear Mrs. Nogas:

3116 P02787

In anticipation of deletion of the 18 hour exemption for initial cover as a result of Subtitle D, we respectfully request the Department's approval to use geosynthetics or tarpaulins in lieu of 6 inches of compacted earth as initial cover in those areas where solid waste will be deposited on the working face within 18 hours.

References from Chapter 17-701 F.A.C. follow:

"17.701.200 (37) "Initial cover" means a 6 inch layer of compacted earth used to cover an area of solid waste before placement of additional waste, intermediate cover, or final cover. The term also includes other material or thickness, approved by the Department, that minimizes vector breeding, animal attraction, and moisture infiltration, minimizes fire potential, prevents blowing litter, controls odors, and improves landfill appearance.

17.701.500 (7)(e) Initial cover shall be applied and maintained at landfills in order to minimize any adverse environmental, safety, or health effects such as those resulting from birds, unauthorized wastes, blowing litter, odors, vectors, or fires. The minimum frequency for applying cover is:

1. For Class I landfill, at the end of each working day, except in those areas where solid waste will be deposited on the working face within 18 hours."

Waste Management has successfully used geosynthetics and tarpaulins as initial cover at several landfills in states which did not have the 18 hour exclusion rules. Use of geosynthetics or tarpaulins at these landfills has resulted in no adverse environmental, safety, or health effects such as those resulting from birds, unauthorized wastes, blowing litter, odors, vectors, or fires.

A comprehensive study was performed with the results given in a March 31, 1991 report. A copy is enclosed for your reference. In addition, I would be pleased to visit with you and present a brief video of deployment of these alternate cover materials if you desire such a presentation.



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We respectfully request the Department's approval of geosynthetics or tarpaulins with similar characteristics to those described in the report as an alternate material as defined in Chapters 17.701.20 (37) and 17.701.500 (7)(e) F.A.C.

Your early review and response are requested at your earliest convenience.

Should you have questions or require additional information, I'll respond promptly to your request.

Sincerely,

Harvey H. Bush, Jr., P.E.
Senior Environmental Engineering Manager
Vice President

HHB/lst

cc: Mary Jean Yon
Scott McCallister
Mary Ardoff
Greg Mathes
Jim Lukens
DeWayne Igou

attachments

cover.alt