Florida Department of Environmental Regulation

Southwest District • 3804 Coconut Palm Dr. • Tampa, Florida 33619

Lawton Chiles, Governor 813-744-6100 Virginia Wetherell, Secretary

April 15, 1993

40612 facility file: Hardee Co. = SW facility

4025C3000 W

Mr. J.R. Prestridge
Hardee County
Department of Solid Waste
Post Office Box 246
Wauchula, FL 33873

Re: Hardee County Solid Waste Facility
Pending Permits: SO25-214306 (Class I Landfill)
SO25-212896 (C & D Debris)
WT25-209268 (Waste Tire Site)

Dear Mr. Prestridge:

This is to acknowledge receipt of supporting information related to the application for Hardee County Solid Waste Facility.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes.

Your applications for a permit remains incomplete. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

The following information is needed in support of the solid waste applications [Chapter 17-701, Florida Administrative Code (F.A.C.)]:

1. Your March 17, 1993 cost estimates have been approved and have been forwarded to Mr. Fred Wick of the Solid Waste Section in Tallahassee. You are requested to work directly with him to obtain approval of Hardee County's financial responsibility documents.

2. Please provide your response to Ms. Allison Amram's April 13, 1993 attachment memorandum. Ms. Amram may be contacted at (813) 744-6100, extension 336.

3. Sufficient information has been provided in support of the construction and demolition debris disposal and waste tire site activities. These will be included as part of one permit when the other remaining issues are resolved.

4. The sequence of filling shown on plans is not sufficient. Leachate generation must be minimized, and also prevented from running off active areas into adjacent stormwater system by constructing berms or ditches. Initial or intermediate cover that may receive leachate shall be graded to shed runoff into the leachate collection system and to minimize mixing of leachate runoff and stormwater. The filling sequence should be clearly described in 3 month increments until such time as the sequence is repeated or the area has reached final contours.

5. The hydrogeologic evaluation by Mevers & Associates verifies that leachate spray irrigated discharges to the creek south of the sprayfield. This is an unauthorized discharge in violation of Department rules and must be corrected. The current spraying operation is similar to recirculation and shall meet the requirements of FAC Rule 17-701.400(5). Leachate management shall meet the requirements of FAC Rule 17-701.500(8). Corrective action plans are required to demonstrate reasonable assurance that leachate will be collected and removed. The current and proposed spraying techniques do not demonstrate removal. Removal includes basically two options:

   1. Evaporation (no mounding)
   2. Off-site treatment

6. Provide plans to comply with FAC Rule 17-701.510, Water Quality and Leachate Monitoring Requirements

"NOTICE! Pursuant to the provisions of Section 120.600, F.S. and Chapter 17-12.070(5), F.A.C., if the Department does not receive a response to this request for information within 30 days of the date of this letter, the Department may issue a final order denying your application. If the response will require longer than 30 days to develop, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

If there are points which must be discussed and resolved, please contact me at (813) 744-6100, extension 382.

Sincerely,

Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management

KBF/ab
Attachment

cc: Steven Dutch, P.E., Wade-Trim
Robert Butera, P.E., FDER Tampa
Steve Morgan, FDER Tampa
Allison Amram, P.G., FDER Tampa
Kathy Anderson, FDER Tallahassee
Fred Wick, FDER Tallahassee

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____ Location: _____

To: _____ Location: _____

To: _____ Location: _____

From: _____ Date: _____

Interoffice Memorandum

TO: Kim Ford, P.E.

THROUGH: Robert Butera, P.E.

FROM: Allison Amram, P.G. AAmram

DATE: April 13, 1993

SUBJECT: Hardee County Landfill
Pending Permit No.: SO25-214306

The Solid Waste Section has reviewed the March 17, 1993 submittal from Wade-Trim and Mevers & Associates addressing the Department's October 13, 1992 and January 11, 1993 comments on the Hardee County Landfill. These issues were also discussed at a March 1, 1993 meeting at the Department. The following comments on the Mever's submittal need to be addressed:

1. What field permeability tests were conducted to determine the 5 feet per day hydraulic conductivity? This was not summarized in Plates 1-3 as referenced in the report. Provide test data, description and results for all permeability tests conducted.

2. Test borings P-10, PA-5, and PA-4 did not encounter the clay confining unit described as Units 5 and 6 in the Mever's report. These were shallow borings, but all were in the northeast corner of the site area. It is possible that the clay confining unit is either deeper than the boring, or not continuous across the study area. At this time, no further investigative studies appear to be warranted, but this possible condition should be acknowledged.

3. There are differences in the groundwater flow map as prepared based on the MODFLOW model, and with the actual data collected from the wells and piezometers. Field measurements indicate a groundwater mound in the sprayfield, but not in the landfill. Piezometers in the landfill indicate that the leachate levels are below that of the surrounding groundwater outside the landfill, which supports the inward gradient, but there are no data points in the landfill that support the groundwater mounding that MODFLOW presented. Please evaluate the field data

and prepare a groundwater contour map of the surficial aquifer, placing the water elevations in the wells/piezometers on the map. Also describe the possible influences to groundwater flow conditions of the landfill, sprayfield, dewatering ditch, ditch/creek located south of the sprayfield, and the low-lying, swampy areas that appear to be located west of the site road. From the groundwater elevations measured, and the MODFLOW model, it appears that the sprayfield has caused a groundwater mound which may discharge into the ditch located south of the sprayfield. This condition could adversely impact both ground and surface waters, and therefore is unacceptable to the Department.

4. The MODFLOW data presented in Appendix A is insufficient for the Department to evaluate. The following items are necessary for review:

   - A site map with the grid overlay to locate the monitoring points, sprayfield, dewatering ditch, creek and swampy area to evaluate the output.
   - Input parameters, and the source of that data.
   - Initial head array to observe piezometer/well heads.
   - Size of the grid spacing.
   - Recharge array to observe where recharge was set to occur, and how much recharge is applied.
   - Boundary array to observe how the dewatering ditch and creek boundaries were defined.
   - The model needs to be refined so that cells do not go dry, as shown in both time steps. Once the cell goes dry, the information provided in adjacent cells has greater error.
   - A copy of the data diskette is also useful for review of the model.

5. In order for the Department to prepare an operating permit for this facility, a water quality and leachate monitoring plan needs to be proposed. This plan shall include all applicable conditions of Chapter 17-701.510, Florida Administrative Code. The plan shall specifically include groundwater monitoring wells to be sampled (including the location of the proposed well south of the sprayfield), piezometers to be monitored for water levels, location and monitoring frequency of the staff gauge in the dewatering ditch, surface water and leachate sampling points, the screened interval of wells MW-1, MW-2 and MW-3.