



# Florida Department of Environmental Protection

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October 5, 2012

E-Mail

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Mr. Leonard Marion  
Volusia County Solid Waste Division  
3151 East New York Ave.  
DeLand, Florida 32724

OCD-SW-12-390

Volusia County – SW WACS # 27540  
Tomoka Farms Road Landfill – North Cell, Phase II, Class I Disposal Area  
Second Request for Additional Information  
Permit Application No. SC64-0078767-029

Dear Mr. Marion:

The additional information dated September 17, 2012 and received on September 18, 2012 was reviewed. The items listed on the attached page remain incomplete. Evaluation of your application will continue to be delayed until all requested information has been received.

In order to ensure the next submittal will be as complete as possible, the Department recommends that we have a meeting to discuss the submittal. Once you have a draft response, please contact Kim Rush to schedule a meeting time and date.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit two copies of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact Kim Rush at (407) 897-4314 or by e-mail at [kim.rush@dep.state.fl.us](mailto:kim.rush@dep.state.fl.us).

Sincerely,

A handwritten signature in cursive script, appearing to read "F. Thomas Lubozynski".

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

Enclosure

cc: Carlo Lebron, P.E. – HDR Engineering, Inc., [carlo.lebron@hdrinc.com](mailto:carlo.lebron@hdrinc.com)  
Junos Reed, Volusia County, [jreed@volusia.org](mailto:jreed@volusia.org)

Note that all references to “Report” in the following text refer to the document entitled, “Tomoka Farms Road Landfill – North Cell, Phase II, Class I Disposal Area, Response to First Request for Additional Information,” with supporting documents prepared by: Carlo Lebron, P.E., dated September 17, 2012. The item numbers below refer to the item numbers in the First Request for Additional Information, OCD-SW-12-325, dated August 22, 2012.

1. Your “Response to First Request for Additional Information,” (Report) clarified that the pipe trench aggregate covered in woven geotextile will protrude 1 foot above the protective layer. However, the Report identified additional changes when it stated, “...the type of pipe and the pipe diameter for the leachate system has also changed from the previous design. There are some other minor design changes in comparison to what was presented yet the major components have been captured.” In order for the Department to be able to assess whether the proposed changes will meet the requirements of Chapter 62-701, F.A.C., more information is necessary. Provide a complete description of the changes made from the previous design including the new type of pipe and pipe diameter change.
2. The Report refers to a “fluff layer.” It also states “trained spotters” will observe waste placement during the initial lift. More information is necessary for both aspects of the reply.
  - a. Rule 62-701.400(3)(d)4, F.A.C., requires the first layer of waste placed on the protective layer above the liner and leachate collection system be a minimum of four feet in compacted thickness, and consist of select wastes containing no large, rigid objects that may damage the liner or leachate collection system.
    - i. Does the County intend to use a layer of “fluff” as the entire first lift (four feet in compacted thickness) instead of select waste?
    - ii. What type of fluff will be disposed? Is it auto shredder fluff or some other type of fluff?
  - b. The Report states, “Volusia County will have trained spotters observing waste placement during this initial lift which should minimize any damage to the pipe trench. Any damages to the geotextile or sand drainage layer will be repaired.”
    - i. By “trained spotter” do you mean a spotter who has received typical spotter training? If the “trained spotter” will not receive any additional training, how is this more protective than normal operations? Or, a spotter who has received specialized training regarding what to watch for as the waste is placed along and near the trench? If so, who will provide that training?
    - ii. Since damage to the geotextile could happen quickly, the Department thinks the spotter will need to be nearby on the ground whenever waste is placed within 5 feet of the trench. Do you agree?
    - iii. Who will do the repairing of the geotextile or aggregate drainage trench? Who will do the Quality Assurance to verify the repair meets the design requirements? How will damage and repairs be documented?
  - c. Please provide a new section to the Operation Plan that discusses these points. This new section, when approved, would become part of the Operation Plan for the facility.

- d. Based on the Report, the Department intends to require a spotter on the ground to verify the first layer of waste does not damage the leachate corridor protrusion (trench).
5. The Report included an aerial photograph of the facility titled "Specific Purpose Survey." Under the left portion of the aerial photograph is another title for the drawing: "Location of Gas Monitoring Wells." All of the locations being monitored for landfill gas migration are labeled. Your answer is complete.

While researching our records for information about the gas monitoring plan, we considered whether the gas monitoring plan needs to be updated. Our concerns and questions will be addressed outside of the application review process for this permit. We list them just for information at this time.

- a. A document "Landfill Gas Monitoring Program," dated May 22, 2001, was submitted to the Department. A February 6, 2003 letter modified the May 2001 gas monitoring plan by eliminating MW-6 from quarterly monitoring and including two methane detectors inside the maintenance building. MW-6 had been detecting methane gas. Since it was outside the building, the detections were not exceedances but they did cause concern. Monitoring inside the building was more appropriate. That is when two methane detectors were installed in the building.
- b. The drawing for the May 22, 2001 monitoring plan shows the household hazardous waste collection center southeast of the Class III landfill. It is now located north of the Class III landfill and east of North cell (Class I Phase II) landfill.
- c. During the permitting process for applications SC64-0078767-014 & SO64-0078767-015, SCS Engineers submitted an RAI response dated August 20, 2002. The submittal had a revised Section H.9 Landfill Gas Control Systems. In section H.9.a concerning lateral migration of landfill gas, it stated:  
"When waste has been placed in the eastern portion of the East Class I cell, the eastern perimeter ditch will no longer be needed to be kept pumped out for dewatering. At that time, the County will begin monitoring for landfill gas migration between the eastern end of the cell and the buildings at the recycling facility and the household hazardous waste facility"
- d. Rule 62-701.530(2)(a), F.A.C. requires ambient monitoring points in on-site structures that can be impacted by combustible gases from the landfill. Is there a reason why the structures west and east of Phase II (for example, sludge processing facility, recovered materials storage facility, HHW, etc) should not be included in the monitoring plan?
- e. Rule 62-701.530(2)(b), F.A.C. requires soil monitoring probes along each property boundary. The survey titled "Location of Gas Monitoring Wells" does not show any soil monitoring probes on the north or east sides of the Class I and Class III disposal areas. The May 22, 2001 monitoring plan explained the reasons probes were not installed. Are the reasons still valid?