

Date: 5/16/96 12:17:32 PM
From: Jeffrey Gould FTM
Subject: Lee Co. Solid Waste Energy Recovery Facility
To: Hamilton Buck Oven TAL
CC: Phil Barbaccia FTM

Hi Buck,

I see that you were copied on a "Request for Modification of the Groundwater Monitoring Plan" for the Lee Co. Waste Energy Recovery Facility. I have completed a review of the document (received 4/11/96) and feel that alternating wells for quarterly and annual analysis is reasonable, along with the slight change in VOC and semi-VOC analysis.

With regard to the results so far, it is not unusual to have iron concentrations that are greater than the secondary standard of 0.3 mg/l for the surficial aquifer in our neck of the woods. The spikes of higher concentration appear related to the effects from seasonal rainfall. In most cases iron takes a sharp increase in the April quarter. Seasonal trends in the deeper wells (screened roughly from -65 to -75 feet NGVD or 85 to 95 feet below existing grade) is not as noticeable, and iron concentrations are generally within standards, or slightly above the 0.3 mg/l limit. This also is something we would anticipate. With the exception of monitoring well MW4-D, total dissolved solids is greater in the deep wells than the shallow wells. That also does not surprise us either.

Monitor wells MW2-D, MW4-S, MW5-D, and MW6-D, did initially have chloride concentrations above the secondary standard of 250 mg/l, however, decreasing trends have brought them down to acceptable levels. Several of these wells now appear to have trends which are consistent with their respective cluster well, and should continue provide a more realistic representation of actual ground water quality.

At this time, we do not see a need to redevelop the monitoring wells, or modify field sampling procedures (i.e. peristaltic pump, filtering, etc.). It is not uncommon during implementation of a monitoring program, to have a period of instability or unusual results that can be attributed to disruption of the aquifer and initial usage of a well.

Consequently, we have no objections to the proposed modification of the ground water monitoring plan which includes sampling of all wells, but on an alternating basis. Limiting volatile and semi-volatile organic compounds to the shallow wells at this time, also seems to be justified.

We do have a question regarding how this modification needs to be handled. In Section XIV.D.3.e. the Conditions of Certification indicate that modification of the ground water monitoring system or program must be done in accordance with the provisions of Condition XII. Malcolm Pirnie, Inc. contends that the County's proposal does not require a modification of the Conditions of Certification. If you know what we are to do in this matter, or know who does, we appreciate the help. If you want to give me a call I'm at Suncom 748-6975. If it's easier to e-mail a message, that will be appreciated also. Thanks, Jeff.

Date: 5/17/96 8:46:03 AM
From: Hamilton Buck Oven TAL
Subject: Lee County RRF Groundwater Monitoring
To: Jeffrey Gould FTM

Jeff: In my opinion your interpretation of Condition XIV.D.3.e. is correct. Lee County technically needs a modification to the Conditions of Certification. We will start the paperwork. We will also include in the Conditions a provision where in the future the Department can approve modifications in the Groundwater Monitoring Plan without modifying the COC.

Date: 5/17/96 10:14:53 AM
From: Jeffrey Gould FTM
Subject: Re: Lee County RRF Groundwater Monitoring
To: Hamilton Buck Oven TAL
CC: Phil Barbaccia FTM

Buck,

Thanks for the response. I'll let Michael van der Heijden, of Malcolm Pirnie, know of the need to modify the Conditions of Certification. I imagine he might give you a call, since I won't be able to explain what the modification will entail.

If you have any questions, or if there is anything we should be doing on our end, please let us know. Thanks a lot. Jeff.

Date: 7/1/96 9:21:33 AM
From: Al Rushanan TAL
Subject: Lee County RRF
To: See Below

Rebekah: Would you please forward this message to Don Kell? Thanks.

Don: FYI, Lee County has requested a modification to their RRF siting certification to change their ground water monitoring plan. The District has reviewed it and has no objection. I found out about it thru the grapevine (the Division Office was not apprised), and just got a copy. Let me know if you want to look at it.

Any chance you getting on e-mail?

Al

To: Rebekah Young TAL
CC: Abdul Ahmadi FTM
CC: Jeffrey Gould FTM
CC: Geoffrey Mansfield TAL
CC: Thomas Singleton TAL
CC: Mary Williams TAL

Believe the permit is almost to be modified.