



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803-3767

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

October 30, 2012

E-Mail

thawkins@wm.com

Mr. Timothy Hawkins
Vista Landfill, LLC
242 West Keene Road
Apopka, Florida 32703

OCD-SW-12-423

Orange County – SW WACS # 87081
Vista Landfill, Class III - LGCS
First Request for Additional Information
Permit Application No. SO48-0165969-020

Dear Mr. Hawkins:


Seth A. Nunes, P.E., of Carlson Environmental Consultants, PC, submitted on your behalf, “Intermediate Class III Operation Permit Modification Application Gas Management System, Vista Landfill, Class III Facility.” It was dated and received October 4, 2012. We have assigned Permit No. SO48-0165969-020 to the application.

The application is incomplete. Please provide the information listed on the attached sheet promptly. Evaluation of your application will be delayed until all the requested information has been received.

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 three 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.

Sincerely,



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

FTL/kr

Enclosure

cc:

FDEP Solid Waste Financial Coordinator, solid.waste.financial.coordinator@dep.state.fl.us

Caroline Shine – FDEP Air Program, caroline.shine@dep.state.fl.us

Seth A. Nunes, P.E. – Carlson Environmental Consultants, PC, snunes@cecenv.com

Paul Bermillo – Waste Management Inc. of Florida, pbermill@wm.com

Sheree Grant – Waste Management Inc. of Florida, sggrant@wm.com

Note that all references to “Report” in the following text refer to the document entitled, “Intermediate Class III Operation Permit Modification Application Gas Management System, Vista Landfill, Class III Facility,” with supporting documents prepared by: Seth A. Nunes, P.E., of Carlson Environmental Consultants, PC, dated October 4, 2012.

1. On Page 39 of 39, which is Part S, of DEP Form 62-701.900(1), the address for Timothy Hawkins is the address used for this letter. However, a letter from Paul Bermillo dated May 21, 2012 stated we use the following address: Tim Hawkins, Area Vice President, Waste Management Inc of Florida, 2700 Wiles Road, Pompano Beach, FL 33073. Which is the correct postal address? Or is either acceptable?
2. Based on the review of the Report, the Department understands the gas management system plan at Vista Landfill to encompass the following:
 - a. Current Conditions: 4 vertical wells, 5 horizontal collectors and header system connected and piped to the open flare located at the Keene Road landfill.
 - b. Interim Design: Installation of future horizontal collectors, vertical wells, tie-ins to leachate collection riser pipes, and all associated piping.
 - c. On-going Maintenance: replacement, re-drilling, relocation, raising and decommissioning of existing wells as needed.
 - d. Closure Design: per conceptual drawing 3, LFG Final Buildout Plan.

Please provide the Department with a drawing of the conceptual interim design (plan drawing and detail drawing) showing the conceptual layout of the future interim horizontal collectors. The Department understands that the interim design and the closure design will be adjusted to account for operational needs. These adjustments (deviations) must be detailed in the construction certification report for each construction event. (Any additional adjustments after the construction certification report is approved by the Department, aside from on-going maintenance, should be discussed with us to determine if a permit modification is necessary.)

3. The following are comments regarding the detailed cost estimate in Appendix C.
 - a. The Permit Modification Application tab section 1.3.5 states “Final gas management system design conditions for the closed landfill will apply in areas of the active landfill, where waste has reached final grade and a certified closed cap is in place.” Landfill gas management systems which are included in the closure plan must be accounted for in the closing cost estimate. Based on your experience at the Keene Road Class III Landfill, the Department believes a landfill gas management is necessary for proper closure of the Vista Class III landfill. Please revise Section IV, Item 8 of the closing cost estimate (page 4 of 9) to include those costs associated with the installation of the final gas management system at closure (as depicted on conceptual drawing 3, LFG Final Buildout Plan).
 - i. The estimate does not have to include portions of the system that are already constructed (for example, the pipeline across Keene Road and the flare). It is best to note on the cost estimate form that the line item has already been constructed.

- ii. As portions of the system depicted on conceptual drawing 3, LFG Final Buildout Plan, are constructed and the certification of construction completion has been approved by the Department, you may submit a new detailed cost estimate eliminating those items from the cost estimate. Or, wait until the next required submittal for a detailed cost estimate.
 - b. In the closing cost estimate Section IV, Item 4 (page 3 of 9), Top Soil Cover, it appears the cost is only for the spreading of the soil. Are we interpreting your entry correctly? Although items on site (for example, stock piled soil) may be used during closure of the facility, the cost estimate must assume all items are purchased and delivered from a third party. Please add the cost for the purchase and delivery of top soil cover for item 4. Or, clarify the entry to indicate what the unit cost represents.
- 4. The Permit Modification Application tab section 1.3.1 states “Upon completion of construction, WMIF will submit a certification of completion to the Administrator summarizing the construction.” Please note, the certification of completion report at a minimum must include the following for each construction event:
 - a. A signed and sealed Certification of Construction Completion of a Solid Waste Management Facility DEP form 62-701.900(2) which can be found at [http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-701/62-701.900\(2\).pdf](http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-701/62-701.900(2).pdf)
 - b. Summary of deviations
 - c. As-built drawings
 - d. Daily logs