



**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

January 25-2013

E-Mail

[lmarion@co.volusia.fl.us](mailto:lmarion@co.volusia.fl.us)

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

OCD-SW-13-019

Volusia County – SW WACS # 27540  
Tomoka Farms Road Landfill – North Cell Class I Solid Waste Disposal Area  
First Request for Additional Information  
Permit Application No. SO64-0078767-030

Dear Mr. Marion:

Mehran (Ron) S. Beladi, P.E., of Neel-Schaffer, Inc., submitted on your behalf, “FDEP Solid Waste Permit Application for the Operations of North Cell Class I Landfill Tomoka Farms Road Solid Waste Management Facility.” It was dated December 12, 2012 and received December 28, 2012. We have assigned Permit No. SO64-0078767-030 to the application.

The renewal application was timely filed as defined in Rule 62-4.090, F.A.C. The existing permit (SO64-0078767-023) shall remain in effect until this renewal application has received final action by the Department.

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. In order to ensure your response will be as complete as possible, the Department recommends that we have a meeting to discuss the draft of your submittal.

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 one hard copy and one electronic copy of the requested information to the Department and reference the above permit application number in your correspondence.

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Tomoka Farms Road Landfill – North Cell Class I Solid Waste Disposal Area

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,



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

FTL/kr

Enclosure

cc:

Mehran (Ron) S. Beladi, P.E. – Neel-Schaffer, Inc., [ron.beladi@neel-schaffer.com](mailto:ron.beladi@neel-schaffer.com)

Carlo Lebron, P.E. – HDR Engineering, Inc., [carlo.lebron@hdrinc.com](mailto:carlo.lebron@hdrinc.com)

Junos Reed, P.E., Volusia County, [jreed@co.volusia.fl.us](mailto:jreed@co.volusia.fl.us)

FDEP Solid Waste Financial Coordinator, [solid.waste.financial.coordinator@dep.state.fl.us](mailto:solid.waste.financial.coordinator@dep.state.fl.us)

Richard Tedder, P.E. – DEP – Tallahassee, [Richard.Tedder@dep.state.fl.us](mailto:Richard.Tedder@dep.state.fl.us)

Note that all references to “Report” in the following text refer to the document entitled, “FDEP Solid Waste Permit Application for the Operations of North Cell Class I Landfill Tomoka Farms Road Solid Waste Management Facility,” prepared by: Mehran (Ron) S. Beladi, P.E., dated December 12, 2012.

1. In the Report, the cover letter states “We request the permit duration to be twenty (20) years of operations for the approximate 90.9-acre contiguous North Cell Class I solid waste disposal facility.” The facility does qualify for a 20 year operations permit. A fee of \$10,000 was paid at the time of submittal of this application; therefore, an additional \$10,000 will be due to the Department every five years hereafter until the time of the next permit renewal. A Specific Condition documenting this fee requirement will be incorporated into the permit.
2. In the Report, the cover letter states “The North Cell Class I solid waste disposal area is comprised of the original North Cell covering 43.2 acres, the 26-acre Phase I expansion, and the 21.7-acre Phase II expansion.” Attachment F, DEP Form # 62-701.900(28) lists the North Cell as 65.65-acres. The FDEP Form # 62-701.900(28) submitted on August 28, 2012 lists the North Cell as 67-acres. Permit SF64-0078767-028 states in Section 1.C: “The North and East Cells have been combined and designated as North Cell, Phase I. This permit is for the closure of the North Cell Phase I (65.64 acres) ...” Based on the submittals for construction permit SC64-0078767-029, the North Cell Phase II area is considered to be 22.7 acres. Drawing B-4 in this Report identifies Phase II as 21.7 acres.
  - a. What is the designation you want for the North Cell area(s) and the correct acreage for each of the areas?
  - b. If necessary, in Attachment F, correct the acreage called out on FDEP Form # 62-701.900(28) and adjust any affected calculations.
3. As outlined in Section 1.1.1, page 1-1, of the Engineering Report, the Department recognizes that the scope of this application covers:
  - a. Renewal of the operations permit for the Class I landfill (original North Cell, Phase I, and Phase II).
  - b. Incorporate partial closure activities into the Class I operation permit.
  - c. Approval of the landfill gas collection system (LGCS) through final build out.
  - d. Approval of the North Cell filling sequence through final build out.
  - e. Removal of required leachate testing from the MPIS.
4. Section 4.4, page 4-2, of the Engineering Report states “Leachate recirculation is not normally performed.” The facility is permitted to recirculate leachate. Even though leachate is not regularly recirculated, provide a section in the Operation Plan describing how leachate would be recirculated back into the landfill. Or, tell us that you no longer desire to be permitted to recirculate leachate.
5. Section 7.4, page 7-4, of the Engineering Report states “The back-up flare station has a capacity of up to 5000 SCFM.” The application includes a final build-out plan for the landfill gas collection system (LGCS).
  - a. Provide calculations showing that the existing flare station is sized to handle the LGCS at final build-out as depicted on sheet 00LFG-07.

- b. The design of the LGCS presented herein is for areas which are active or have only received intermediate cover. If a gas extraction component needs to be installed after an area has undergone partial closure (i.e., an area which received a geomembrane cap), a permit modification must be obtained prior to construction.
  - c. Notification to the Solid Waste Permitting Section of the Central District is required prior to the start of construction of each phase of the LGCS. A Certification of Construction Completion will be required after each phase of LGCS construction. A Specific Condition will be incorporated into the permit for the LGCS construction phasing requirements. These solid waste requirements are in addition to any Air Program requirements.
6. Section 10.4, page 10-3, of the Engineering Report states “When LFG generation decreases further below hazard levels, the active gas collection system would be operated as a passive vent system.” Please acknowledge that the transition from an active gas collection system to a passive vent system would require Department approval and a solid waste permit modification. This solid waste requirement is in addition to any Air Program requirements.
7. Attachment C, Operation Plan section 2.9.2, page 2-10, states “The second (south) leachate storage pond is normally used for the storage of leachate treatment plant effluent... The south leachate storage pond can be used to provide additional raw leachate storage capacity ...”
  - a. What controls are in place to ensure that during those times that the south leachate storage pond is used to store raw leachate the raw leachate does not accidentally get sprayed onto the spray fields or used as dust control?
  - b. How is the south pond emptied and cleaned after holding raw leachate prior to receiving treatment plant effluent?
8. Attachment E describes the video inspection done on the leachate system. The inspection identified multiple areas in need of cleaning and repairs.
  - a. Was the leachate system cleaned?
  - b. Were repairs to the leachate system performed?If the system was cleaned and repaired, provide the Department with the report. If the system has not been cleaned and/or repaired since the video inspection, provide the Department with the schedule for when the cleaning and/or repairs will be accomplished. That schedule may become a specific condition in the permit.
9. Please note, since the closure cost estimate in this Report does not include closure costs (costs to close as well as 30-year long-term care) for the Phase II area, proof of financial assurance for Phase II must be provided to the Department at least 60 days prior to the initial receipt of waste [as required by Rule 62-701.630(2)(b), F.A.C]. To meet the 60-day requirement, submit a new detailed cost estimate for Phase II at least 90 days prior to the planned initial receipt of waste. The Central District will review the new cost estimate as quickly as possible so that the approved amount can be funded before the 60-day time limit.
10. Section 8.3 of the Engineering Report notes that the County is preparing a response to the October 29, 2012 RAI for Evaluation Monitoring under a separate cover. At the time of the current review, the Department does not have any record of having received this information.

If it was sent prior to the date of this Request for Additional Information, please provide the date and the name of the DEP person it was addressed to. Otherwise, please provide this information in your response to this RAI.

11. Condition #27 of the MPIS requires:

A total depth measurement must be made on each well at time of permit renewal. This information must be provided as part of permit renewal application. This measurement is to be reported as total apparent depth below ground surface and should be compared to the original total depth of the well.

Table 1 of the Technical Report dated April 6, 2012 shall be accepted as fulfilling the Total Depth Survey requirement for this renewal.