



FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

CENTRAL DISTRICT
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May 01, 2014

Mr. Leonard Marion
Volusia County Solid Waste Services
3151 East State Road 44
Deland, FL 32724-6409

OCD-SW-14-2124

Volusia County – SW WACS # 27540
Tomoka Farms Road Landfill
2013 Annual Groundwater Benzene
Evaluation Monitoring Summary Report

Dear Mr. Marion:

On behalf of Tomoka Road Landfill, HDR Engineering, Inc., submitted the report, "2013 Annual Groundwater Benzene Evaluation Monitoring Summary Report". The report was dated 3/10/2014 and was received by the Department on 3/11/2014. The Department has reviewed the report. The following is a summary of the conclusions in the report and the Department's response in italic:

2013 Annual Report Conclusions

1. No additional wells are required at the northern and southern boundaries of the Class III Facility. At the east landfill boundary, no new wells are proposed at this time and additional monitoring data are required to determine whether additional wells will be required to completely delineate benzene near B85-6.

Department's Response: The Department agrees that no new wells are required for the northern area at this time. Because the wells on the southern boundary B81-4 and B86 are overlapped with the B5/B37 site assessment monitoring, the Department intends to refer the wells to the Waste Clean Up Section.

The Department agrees that more monitoring data are required to determine whether additional wells will be required to completely delineate benzene near B85-6

2. Benzene is the only Appendix I/II parameter detected above the PDWS at the site within the facility boundary and benzene concentrations in general showed a decreasing trend or were stable. Therefore, it is recommended that the evaluation monitoring frequency be reduced from quarterly to semiannually to coincide with the semiannual compliance monitoring events at the TFRL facility.

Department's Response: The Department agrees that the Evaluation Monitoring frequency can be reduced from quarterly to semi-annual to coincide with the semi-annual monitoring.

3. If benzene concentrations continue to decline or become stable within the next two monitoring events; and if no additional Appendix I/II parameters are confirmed to be above the groundwater standards, it is recommended that the evaluation monitoring be discontinued and return to routine monitoring only.

Department's Response: The Department agrees that if the benzene concentrations continue to decline or become stable within the next two monitoring events (2014-05 and 2014-11) the MPIS can be revised to use the routine semi-annual sampling for monitoring the benzene at the landfill and end the formal evaluation monitoring.

4. Benzene was detected only slightly above the PDWS at B41-1, B43-1, and B45-2 historically and in 2013 no benzene or other Appendix I/II parameters have been detected above the PDWS at these wells. Further, no Appendix I/II parameters were detected at B83 and B85 above any standards since their installation in early 2013. Therefore, it is recommended that these wells be removed from the evaluation monitoring list.

Department's Response: The Department agrees that B41-1, B43-1, B83, and B85 can be removed from Evaluation Monitoring. Whether or not they are used in the revised MPIS will be reevaluated after the Department reviews the next two monitoring events (2014-05 and 2014-11).

Well B45-2 shall continue to be monitored to help monitor the nitrate (112 mg/L) in the area.

Zone of Discharge

5. The Department agrees that for the two areas of the landfill that are not under B5/B37 site assessment monitoring, Volusia County should prepare a request to the Department for an expansion of the zone of discharge as provided for in rule 62-520.465(2)(b), F.A.C.:

"The Department shall establish a zone of discharge larger than that provided in paragraph (a) above upon affirmative demonstration by the applicant that:

- 1. The requested zone of discharge will not cause violations of applicable groundwater standards in present and future potable water supplies;*
- 2. The requested zone of discharge will not interfere with existing or designated uses of contiguous waters, or cause a violation of applicable surface water quality criteria and contiguous water outside a permitted mixing zone; and*
- 3. The economic and social benefits of a zone of discharge of larger dimensions than those in paragraph (a) above outweigh the economic, environmental and social costs resulting from the larger zone of discharge. "*

You may contact Marjorie Heidorn by e-mail at marjorie.heidorn@dep.state.fl.us or phone at (407) 897-4302 with questions about this letter or to discuss the content of your request for a larger ZOD.

Sincerely,



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

FTL/mh

cc:

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