



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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July 17, 2014

E-Mail

Imarion@volusia.org

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

RE: Tomoka Farms Road Landfill Class III, Volusia County
Application for Operations Renewal
WACS No. 27540
Application No.: 0078767-034-SO/T3

Dear Mr. Marion,

Thank you for the subject *FDEP Solid Waste Permit Renewal Application for the Operations of Class III Landfill Tomoka Farms Road Solid Waste Management Facility Volusia County Solid Waste Division* dated June 20, 2014 and received on June 20, 2014. This application was prepared by Neel-Schaffer, Inc. Based on the Department's review, the application is incomplete at this time. Please provide the information requested in the attached document as soon as possible.

When responding to this Request for Additional Information (RAI) if a response modifies a section of the application the respective section(s) should be updated accordingly. A revised, complete version of the documents that includes all revisions made in responding to this RAI should be attached. To enable the Department to view changes to the documents, all additions should be underlined (e.g., added) and all deletions should be struck through (e.g., ~~deleted~~). Additionally, the submittal should make a positive statement that all revisions have been tracked in the aforementioned way. By this method, the Department hopes to have one final version of the respective documents that includes all revisions made during this permitting process.

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.

Mr. Marion, Director
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If your responses involve the practice of engineering or geology, as defined in Chapters 471 or 492, Florida Statutes respectively, please have that work signed and sealed by a professional engineer or professional geologist as appropriate. Also, please submit one hard copy and one electronic copy of the requested information to the Department and reference the above 0078767-034-SO/T3 number in your correspondence.

In order to ensure your response will be as complete as possible, the Department recommends we have a meeting, either by phone or in person, to discuss your draft submittal. If you would like to discuss any issue in this letter or schedule a meeting with the Department we are happy to do so. Please feel free to contact me by email at Elizabeth.Kromhout@dep.state.fl.us or by phone at (850) 245-8744 or by mail at Mail Stop #4565 at the letterhead address above.

Sincerely,



El Kromhout, P.G.
Permitting & Compliance Assistance Program

Enclosure: Attachment I Department Review Comments

cc:

Junos Reed, P.E., TFRLF Operations Manager, jreed@volusia.org
Jennifer Stirk, Volusia County Solid Waste Division, jstirk@volusia.org
Mehran (Ron) Beladi, P.E., Neel-Schaffer, Inc., Ron.Beladi@neel-schaffer.com
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Attachment I

Department Review Comments

Application

1. The estimate of remaining life is given 4 times in the application with 3 different values: section 1.1 ERL=2034, section 4.4.2 ERL=2043, section 4.4.3 ERL=2044, and section 13.2 ERL=2043. Please clarify which estimate of remaining life is the actual estimate.
2. In section 1.4.6. Hydrogeological Investigation Requirements, a separate status update is mentioned as being provided as an attachment, but was not provided. Please provide the status update.
3. Section 4.4.4 discusses on-site cover material. Please clarify what type of cover material (daily, closure, etc.) is referred to in this section.
4. Section 11.0 Part M – Special Waste Handling Requirements states, “No special wastes are disposed in the Class III disposal unit.” Asbestos is disposed in the Class III disposal unit which has special waste handling protocols per 62-701.520(3), F.A.C. Please revise.
5. In Attachment B, drawing B-7 Well Location Information (April 2014) is listed but not provided. Please provide drawing B-7.

Operations Plan

6. The Operations Plan included in the application appears to be a previous version. Please use the June 10, 2014 Operations Plan previously approved in modification 0078767-033-SO-MM issued June 17, 2014 for any revisions moving forward.
7. In section 5 of the Operation Plan, Figure 1-1 is referenced but not provided. Please provide Figure 1-1 for the Operations Plan.
8. Please check that Appendix C is included in the Table of Contents.

Cost Estimate

9. Page 1, Item 1, states "It is assumed that monitoring wells will be in place at time of closure; therefore wells are not included as part of the closure construction estimate." Drawing B-7 Well Location Information (April 2014) in section "Attachment B" of the application is missing. Without drawing B-7, determination of any wells left to be installed is not clear. If wells have been planned for but are not currently installed, please include a cost for those wells in the cost estimate.

10. Page 2, Item 3, Cover Material (a) states "The unit cost has been inflated using FDEP approved inflation factor of 1.015..." This is not the correct inflation factor. The 2014 factor of 1.017 should be used.
11. Page 4, Closure Item 12 and Long-Term Care Item 15 - Contingency, contingencies of 10% have been accepted for projects without question. Please provide supporting documentation and details that a 5% contingency is sufficient for both closure and long-term care costs.

MPIS

12. For the MPIS, please provide a site drawing with all monitoring sites (ground water monitoring wells and surface water monitoring locations) indicated on the map.
13. Please provide the MPIS Technical Report, covering May 2012 through May 2014, due at time of permit renewal (8/10/2014) as described in the current approved MPIS (dated April 17, 2014).
14. The request to remove SW-1 from the MPIS is acknowledged by Department staff. The introduction of stormwater flow from Interstate 4 runoff collected on adjacent property to the pond and its contribution to the water quality of the site is a potential concern. Department staff is proposing changing the status of SW-1 from a Compliance sampling site to a Background sampling site. This arrangement would allow for observation of conditions in order to see if the runoff from Interstate 4 is impacting the water quality on site.