



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

CENTRAL DISTRICT
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October 23, 2014

Electronic Mail

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Jim Christiansen
Environmental Protection Manager
Waste Management Inc. of Florida
7382 Talona Drive
W. Melbourne, FL 32904

Orange County
Vista Landfill, LLC WACS # 87081
Response to Request for Reduced Ground Water Monitoring

Dear Mr. Christiansen:

Waste Management submitted a request for modifications to be made to the Water Quality Monitoring Plan Implementation Schedule (MPIS) at Vista Class III Landfill. The request, "Groundwater Monitoring Plan Modification" was dated and received on May 30, 2014. The document requested 7 changes to the MPIS. The Department is willing to approve all 7 changes, but this must be accomplished through a permit modification.

I. DEP's understanding of the requested changes, based on your 5/30/2014 document

1. Measure water levels in all wells semi-annually and provide semi-annual water level maps for the shallow and intermediate zones;
2. Sample the shallow wells semi-annually for the Rule 62-701.510(5)(c) & (7)(a), F.A.C. required parameters currently listed in the site MPIS;
3. Sample the intermediate wells annually for indicator parameters chloride, sodium, and ammonia to verify there are no leachate impacts;
4. Sample the intermediate well(s) in question for the full list of parameters if the shallow well for the well cluster(s) shows a verified landfill impact;

5. Sample the intermediate well(s) in question for the full list of parameters if the indicator data suggests through an increasing trend (or verified sudden jump far above background) that there is a landfill impact to the intermediate well(s).
6. Utilize the Upper Floridan wells as piezometers with no routine sampling unless there are verified landfill impacts in the intermediate water unit.
7. Gross alpha, aluminum, and manganese were added to the MPIS after these parameters were detected in background samples. While there have been detections of these parameters, the concentrations have all been attributed to background and not from the landfill because there are no indicator trends concurrent with these detections. Therefore, the site requests to remove these parameters from the semi-annual sampling requirement.

Department Note: *In #3, the Department will add nitrate to the list of indicator parameters for the intermediate wells to watch that the exceedances do not extend beyond the shallow wells.*

II. Process for Modifying the Permit for Reduced Parameters (This process is based on the proposed Parameter Reduction Document 8/21/2014 currently under review by the Division of Waste Management.)

- a. The permittee must submit a permit modification application requesting to reduce monitoring parameters or number of monitored wells. Depending on the type and size of the facility and number of parameters to be addressed, the permit modification will be either minor or intermediate.

Department Note: *Based on the 5/30/2014 request, the Department expects this to be a minor modification for Vista.*

- b. The permittee must submit the following as part of its request to reduce parameters:
 - i. A cumulative summary table of analytical results for all parameters that they are requesting to be removed from the monitoring plan, even if the parameter has not been detected.
 - ii. For parameters that have been below laboratory detection limits, the summary table must include
 1. The detection limit that was achieved during each sampling event. That is, the table must express the concentration as “<(numerical value of minimum detection level),” not as “ND” or “<MDL” or “<LDL”.
 2. The table must include all results for each respective monitoring well for which parameter reduction has been requested.

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Department Note: *The Department considers the 2010-2013 SCS Engineers Technical Report dated 10/18/2013 as having fulfilled the "II. b i & ii." requirements. Just reference that report in your application.*

- iii. A specific recommendation about parameter reductions (which wells and which parameters).
- iv. Since the request to reduce parameters is an interpretation of scientific data and part of a proposed water quality monitoring plan, it is required to be sealed by a professional geologist or professional engineer pursuant to Rule 62-701.510(2)(a), F.A.C.

Department Note: *The Department considers the document titled "Groundwater Monitoring Plan Modification" was dated and received on May 30, 2014, as having fulfilled the "II. b iii & iv" requirements. Just reference that letter in your application.*

Any reduction of parameters or frequency of monitoring must be approved by the Department before it can be implemented. The approval must be incorporated into the facility's permit.

You can contact Marjorie Heidorn by email at marjorie.heidorn@dep.state.fl.us or phone at (407) 897-4302 with questions about this letter.

Sincerely,



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

FTL/mh

Attachments:

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