



11457 C.R. 672, Riverview, Florida 33569

December 23, 2014

Mr. F. Thomas Lubozynski, P.E.  
Waste Program Administrator  
Solid and Hazardous Waste Program  
Florida Department of Environmental Protection, Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Re: 21<sup>st</sup> Semi-Annual Water Quality Monitoring Event - Notice of Exceedances  
J.E.D. Solid Waste Management Facility (JED Facility)  
Omni Waste of Osceola County, LLC  
Permit No. SO49-0199726-022  
WACS Facility ID: 89544

Dear Mr. Lubozynski:

The purpose of this letter is to inform the Florida Department of Environmental Protection (FDEP) that monitoring parameters exceeded the Department's water quality standards in some of the groundwater monitoring wells at the JED Facility during the 21<sup>st</sup> semi-annual water quality monitoring event performed in November 2014. In accordance with 62-701.510(6)(a), Florida Administrative Code (F.A.C.), the Department is being notified of these findings within 14 days of receipt of the analytical laboratory results. A brief summary of the exceeded monitoring parameters are presented below and results provided on the attached Table.

Ammonia - ammonia was reported above the groundwater cleanup target level (GCTL) of 2.8 mg/L in twelve (12) of the shallow groundwater monitoring wells (i.e., MW-1A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 11A, 22AR and 23A) and three (3) of the intermediate monitoring wells (MW-5B, 10B and 23B). Ammonia has been detected in most of these wells during previous sampling events. Based on this historical data, these wells will not be re-sampled for ammonia and the reported concentrations will be considered as representing current conditions.

Benzene – benzene was reported above the GCTL of 1 $\mu$ g/L in ten (10) of the shallow groundwater monitoring wells (MW-1A, 3A, 4A, 6A, 8A, 9A, 10A, 11A, 12A, and 13A) and two (2) of the intermediate wells (MW-1B and 3B). Benzene has been detected above the GCTL in most these wells during previous monitoring events at similar concentrations. Based on this historical data, these wells will not be re-sampled and the reported concentrations will be considered as

representing current conditions.

Chloride – chloride was reported above the GCTL of 250 mg/L in monitoring well MW-1A (513 mg/L). MW-1A will not be re-sampled for chloride and the reported concentration will be considered as representing current conditions.

Iron – iron was detected above the GCTL of 300 µg/L in all monitoring wells sampled during this event with concentrations ranging from 330 µg/L to 40,000 µg/L. The concentrations are consistent with previous results and will not be re-sampled and the reported concentrations will be considered as representing current conditions.

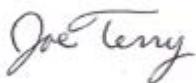
Lead – lead was detected above the GCTL of 15 µg/L in intermediate monitoring wells MW-25B (18.4 µg/L) and MW-26B (34.7 µg/L); however these wells had high turbidity levels and a filtered sample was collected for dissolved metals analysis in addition to the unfiltered metals sample. The dissolved lead concentrations in MW-25B and 26B were below the GCTL at 0.12 µg/L and 0.2 µg/L, respectively. These wells will not be resampled.

Sodium – sodium was reported above the GCTL of 160 mg/L in monitoring well MW-1A (289 mg/L). MW-1A will not be re-sampled for sodium and the reported concentration will be considered as representing current conditions.

Total dissolved solids (TDS) – TDS concentrations were reported above the GCTL of 500 mg/L in shallow groundwater monitoring wells MW-1A (1,260 mg/L), MW-3A (518 mg/L), MW-4A (639 mg/L), MW-8A (1,520mg/L) and MW-22AR (1,010 mg/L) and intermediate monitoring wells MW-1B (535 mg/L), MW-3B (1,170 mg/L), MW-4B (1,670 mg/L), MW-5B (1,700 mg/L), MW-7B (822 mg/L), MW-9B (836 mg/L), MW-10B (1,600 mg/L) and MW-26B (531 mg/L). The reported concentrations will be considered as representing current conditions.

If you have any questions or need additional information, please contact the undersigned at (813) 943-8633 or by email [joseph.terry@progressivewaste.com](mailto:joseph.terry@progressivewaste.com).

Sincerely,



Joe Terry  
Environmental Manager

cc: M. Kaiser, PWS  
G. DePradine, FDEP  
M. Wissler, Geosyntec

Table 3

**SUMMARY OF GROUNDWATER ANALYTICAL DATA  
21st SEMI-ANNUAL WATER QUALITY MONITORING EVENT  
J.E.D. SOLID WASTE MANAGEMENT FACILITY**

Well ID	1,4-Dichlorobenzene	Benzene	Ethylbenzene	Toluene	Total Xylenes	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Iron	Lead	Mercury	Nickel	Selenium	Sodium	Vanadium	Zinc	Ammonia	Chloride	TDS	
	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (ug/L)	GCTL (mg/L)	GCTL (ug/L)	GCTL (mg/L)	GCTL (ug/L)	GCTL (mg/L)	GCTL (mg/L)	GCTL (mg/L)		
75	1	700	40	20	10	2,000	4	5	100	420	1,000	300	15	2	100	50	160	49	5,000	2.8	250	500		
MW-1A	0.95	i 2.8	0.21	u 0.19	u 0.31	u 0.9	i 86.9	0.06	i 0.1	u 2.6	2.1	0.7	i 7,610	0.16	i 0.05	i 9.1	1.1	u 289	i 12.1	4.1	i 12.8	513	1,260	
MW-1A DUP	0.88	i 2.7	0.21	u 0.19	u 0.31	u 0.8	i 85.1	0.13	i 0.1	u 3.4	2.2	0.9	i 7,890	0.19	i 0.03	i 8.1	1.1	u 290	i 12.6	7.0	i 12.9	518	1,250	
MW-1B	0.16	u 2	0.21	u 0.19	u 0.31	u 0.7	i 156	0.05	i 0.1	u 2.2	2.2	0.3	u 11,500	0.12	u 0.02	u 3.5	1.1	u 78.1	i 1.5	i 1.8	i 2.06	148	535	
MW-2A	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 69.3	0.15	i 0.1	u 2.5	2.7	0.3	u 7,510	0.12	u 0.02	u 5.0	1.1	u 30.6	2.0	3.0	i 1.98	53.9	350	
MW-2B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 11.1	0.04	u 0.1	u 0.3	i 0.3	0.3	u 920	0.12	u 0.02	u 0.5	u 1.1	u 67.3	0.3	u 1.6	u 0.113	12.8	38	
MW-3A	0.87	i 5.2	0.21	u 0.19	u 0.31	u 2	46.7	0.04	u 0.1	u 3.8	1.2	0.8	4,790	0.14	u 0.02	u 2.6	1.1	u 62.6	18.2	3.8	i 8.79	51.4	518	
MW-3B	0.16	u 2.4	0.21	u 0.19	u 0.31	u 0.7	i 76.1	0.97	0.1	u 0.2	u 10.5	0.5	37,400	0.12	u 0.02	i 4.6	1.1	u 32.6	1.3	i 3.2	i 1.31	25.3	1,170	
MW-4A	0.16	u 2.9	0.21	u 0.19	u 0.31	u 2.8	55.3	0.04	u 0.1	u 1.6	2	0.6	6,440	0.19	i 0.02	i 4.1	1.1	u 34.2	3.2	1.6	u 10.8	36.1	639	
MW-4B	0.16	u 0.45	i 0.21	u 0.19	u 0.31	u 1.1	51.4	0.73	0.1	u 0.8	i 0.6	0.8	2,600	0.12	u 0.02	u 5.4	1.1	u 30.4	5.8	1.6	u 1.92	33	1,670	
MW-5A	0.16	u 0.86	i 0.21	u 0.94	i 0.31	u 1.5	5.3	0.04	u 0.1	u 4.3	0.2	i 2.7	1,000	1.35	0.06	i 1.1	i 1.1	u 14.3	1.8	i 1.6	u 7.4	15.5	218	
MW-5B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 78.1	1.11	0.1	u 1.4	1.5	0.6	2,990	0.12	u 0.02	u 4.9	1.1	u 27.7	3.2	1.6	u 4.61	31.5	1,700	
MW-6A	0.16	u 3	0.21	u 0.19	u 0.31	u 1	10.6	0.04	u 0.1	u 0.9	i 0.9	i 1.5	19,300	0.16	i 0.1	i 1.1	i 1.1	u 37.2	3.6	1.6	u 5.84	89.6	216	
MW-6B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 19	0.09	i 0.1	u 0.9	i 0.2	i 0.3	u 790	1.02	u 0.02	u 0.5	u 1.1	u 7.64	2	i 1.6	u 0.15	13.2	49	
MW-7A	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.8	i 9.1	0.04	u 0.1	u 2.8	0.9	i 0.3	u 4,590	0.12	u 0.02	u 1.3	i 1.1	u 16.9	2.2	1.6	u 5.63	29.5	106	
MW-7B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.8	76.6	1.11	0.1	u 0.5	i 7.8	0.3	40,000	0.12	u 0.04	i 5.6	1.1	u 49.9	3.1	5.6	i 1.86	43.1	822	
MW-8A	0.9	i 3.7	0.21	u 0.19	u 4.3	1.3	63.5	0.31	i 0.1	u 1.5	4.5	0.6	16,400	0.12	u 0.02	u 12	1.1	u 25.8	4.3	1.6	u 9.42	14.5	1,520	
MW-8B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.8	4.54	0.1	u 0.2	u 4.3	0.3	u 20,700	0.20	i 0.02	u 2.9	1.1	u 36.7	3.8	3	i 0.438	56.3	376		
MW-9A	0.65	i 8.5	0.21	u 0.19	u 5	2.4	3.6	0.04	u 0.1	u 2.5	0.2	i 1.6	570	0.35	i 0.05	i 0.9	i 1.1	u 47.6	1.6	i 1.6	u 4.6	17.8	227	
MW-9B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 29.6	1.59	0.1	u 1.4	10.7	0.3	u 35,100	0.12	u 0.02	u 4.5	1.1	u 33.2	4.1	6.3	i 1.69	29.2	836	
MW-10A	0.16	u 7.7	0.21	u 0.19	u 0.31	u 1.1	8.2	0.04	u 0.1	u 0.9	i 0.2	i 0.3	u 950	0.12	u 0.02	u 0.6	i 1.1	u 18.3	0.3	i 1.6	u 4.36	21.9	139	
MW-10B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.6	i 6.7	3.21	0.1	u 1	24.2	0.4	37,000	0.12	u 0.02	u 6.1	1.1	u 33.9	3.4	3	i 16.8	32.5	1,600	
MW-11A	2.6	10	0.22	i 0.19	u 0.31	u 1.3	63.5	0.27	i 0.1	u 1	1.2	0.3	u 2,200	0.12	u 0.02	u 3.1	1.1	u 27	3.9	1.6	u 3.74	16.7	273	
MW-11B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 1.2	14.3	0.04	u 0.1	u 1.4	0.05	0.3	u 350	0.31	u 0.02	u 0.5	u 1.1	u 14.5	2.2	1.6	u 0.065	13.4	65	
MW-12A	0.16	u 6	0.21	u 0.19	u 0.31	u 1.1	20.4	0.15	i 0.1	u 1	1.3	0.3	u 2,210	0.12	u 0.02	u 3.8	1.1	u 18.7	2	i 1.6	u 0.491	31.9	102	
MW-12B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 28.3	0.04	u 0.1	u 0.9	i 0.2	i 0.3	u 1,130	0.12	u 0.02	u 0.5	u 1.1	u 9.3	0.5	i 1.6	u 0.108	22	60	
MW-13A	0.16	u 3.4	0.21	u 0.19	u 0.31	u 7.5	36.9	0.07	i 0.1	u 1.5	0.7	i 0.3	u 12,300	0.12	u 0.07	i 1.4	i 1.1	u 36.6	3.3	1.6	u 1.59	67.4	243	
MW-13B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 17.7	0.05	i 0.1	u 0.3	i 0.3	i 0.3	u 1,730	0.12	u 0.02	u 0.5	u 1.1	u 13.9	0.5	i 1.6	u 0.15	32.1	74	
MW-16AR	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.6	i 27.2	0.06	i 0.22	i 0.7	i 0.2	i 0.8	540	0.12	u 0.02	u 7.7	i 1.1	u 14.2	6.2	1.6	u 0.354	16.4	140	
MW-16BR	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 12.5	0.04	u 0.1	u 0.8	i 0.2	i 0.3	u 800	0.35	i 0.02	u 0.5	u 1.1	u 7.9	0.8	i 1.6	u 0.145	10.9	43	
MW-17AR	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 53.3	0.07	i 0.29	0.8	i 0.3	i 0.3	u 920	0.12	u 0.02	u 1.2	i 1.1	u 10.9	5.6	1.6	u 0.331	7.8	69	
MW-17BR	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.8	i 38.1	0.04	u 0.1	u 1.6	0.2	i 0.3	u 1,980	0.67	u 0.02	u 0.6	i 1.1	u 28.1	1.8	i 1.6	u 0.199	43.1	123	
MW-22AR	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 1.2	68.4	0.04	u 0.1	u 2.2	0.3	i 0.3	u 1,620	0.12	u 0.02	u 2.3	i 1.1	u 29.4	3.5	1.6	u 7.02	20.5	1,010	
MW-22BR	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	u 10.2	0.04	u 0.1	u 0.6	i 0.3	i 0.3	u 1,040	0.12	u 0.02	u 0.5	u 1.1	u 14.3	1.2	i 1.6	u 0.114	23.8	83	
MW-23A	0.16	u 0.33	i 0.21	u 0.19	u 0.31	u 1.2	23.8	0.04	u 0.1	u 2.1	0.3	i 0.8	330	0.24	i 0.02	i 1.8	i 1.1	u 22.7	3.2	1.6	u 3.16	27.7	412	
MW-23B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.8	i 160	0.27	i 0.1	u 0.4	i 1	i 0.3	u 3,050	0.12	u 0.02	u 0.6	i 1.1	u 24.6	1.2	i 1.6	u 4.47	25.2	273	
MW-24A	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.6	i 8.9	0.04	u 0.1	u 1.7	0.08	i 0.3	u 770	0.30	i 0.02	u 0.50	u 1.1	u 10.6	2.5	1.6	u 0.046	12.5	53	
MW-24B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 0.5	i 18.5	0.04	u 0.12	u 2.1	0.4	i 0.4	u 840	0.91	0.02	u 1.40	i 1.1	u 5.2	3.3	1.7	i 0.081	6.3	24	
MW-25A	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 1.5	52.6	0.17	i 0.1	u 1.1	0.8	i 0.3	u 5,050	0.12	u 0.02	u 0.60	i 1.1	u 27.3	2.1	1.6	u 1.17	56.5	166	
MW-25B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 1.6	315	1	i 1	u 1.1	25.7	1	i 5.2	4,660	18.4*	i 0.16	u 5.00	4.6	19.7	i 43	3.8	i 0.211	20.6	469
MW-26A	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 1.1	21.7	0.04	u 0.1	u 1.8	0.2	i 0.3	u 2,790	0.2	u 0.02	u 0.50	u 1.1	u 16.4	1.7	i 1.6	u 0.66	24.2	91	
MW-26B	0.16	u 0.21	u 0.21	u 0.19	u 0.31	u 1.1	301	0.94	0.33	i 29.7	1.5	2.7	5,670	34.7*	0.15	4.2	3.9	15.8	38.9	3.3	i 0.341	16.6	531	

NOTES: Only parameters with detections above the Method Reporting Limit are shown.

- i The Reported Value is between the Laboratory Method Detection Limit (MDL) and the Laboratory Practical Quantitation Limit (PQL).
- Detect
- Exceeds GCTL

u = indicates that the compound was analyzed for but not detected at or above the value shown

\* = value is the total recoverable concentration; due to high turbidity a filtered sample was collected for dissolved metals analysis only. Filtered result was less than the GCTL.

v = indicates the analyte was detected in both the sample and the associated method blank.