

Dept. Of Environmental Protection

FEB 20 2008

Southwest District

February 15, 2008

Ms. Susan Pelz, P.E.
Solid Waste Program Manager
Department of Environmental Protection - Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RE: Angelo's Recycled Materials
Enterprise Class III Facility
FDEP Permit No.: 177982-002-SO
Pasco County, Florida
Response to February 7, 2008 Site Inspection

Dear Ms. Pelz:

We appreciated the opportunity to meet with Ms. Madden, Ms. Gaskin, and you at our site on February 7, 2008 to perform a site inspection of our Class III operations and to discuss operational issues. We also appreciate the review of our asbestos disposal files from the FDEP representative in the Air Department. All of the items noted on the Department's inspection report were in the process of being worked on at the time of the inspection and the work (much of which is routine) has been completed. In the following response, we have reiterated the inspection comment from the Department (in italics) with our explanation immediately following.

2.8 Are the following prohibited waste materials or special wastes properly controlled, managed and disposed? PCB wastes Rule 62-701.300(5). We accept the "OK" indication from the Department that we are in compliance with this requirement, but would like to provide additional comment. Our spotters routinely pull electrical ballasts from the incoming waste stream. These ballasts are common remnants of electrical components and can sometimes be left within the rubble of demolished homes and trailers, despite the requirement for off-site contractors to remove them. It is known that some, but not all, of these transformers may contain PCB materials. Our spotters have been instructed to pull all ballasts from the incoming waste stream. Despite the efforts of the off-site contractors, load checking, and load spotting efforts, di-minimis amounts of unauthorized materials make it through this process, which is contemplated in Chapter 62-701 and allowed. Nonetheless, we have re-emphasized to our spotters our internal goal of finding all such materials and removing them for appropriate off-site disposal. The ballast that was observed during the inspection has been removed for appropriate off-site disposal.

2.13 Is the operation plan substantially followed? 62-701.500(2). The written notes on the inspection report indicate that "insufficient initial cover" was identified along the western cut

on the top of Cell 4 with several debris items visible in the cover. We appreciate the discussion with you on this issue at our scale house after the inspection and again want to strongly object to this characterization. The following was acknowledged by all present during the post-inspection discussion in the scale house:

- The area in question was very small and was not indicative of the entire site. We measured this area to be approximately 20' x 100', which would be less than 0.9% of the Cell 4 area. However, within this area there were very few (less than 30) items protruding from the initial cover.
- The area in question had small amounts of debris at the surface, or protruding from the initial cover.
- The area in question had the required 6-inch placement of initial cover, but by virtue of material sticking through (or tracked onto) the cover, the area was deemed by the Department as "insufficient". We later performed 3 post-hole borings in the area and found the initial cover thickness to range from 9 to 14 inches thick.
- The area in question was in the process of being repaired by the landfill operators, with a stock pile of dirt placed at the southeast corner of the area in question.

We have been able to verify that the initial cover was placed and exceeds the thickness requirement of 6 inches required by Rule 62-701.200(59) and as specified in the Operations Plan. We were also in the process of repairing the area by removing the debris and providing additional soil cover as allowed by the rule to maintain initial cover. The work performed to address this issue was not outside of the time limits necessary to comply with the FDEP rules and the requirement of our Operating Permit. For these reasons we believe that the inspection form should have been marked "OK". Our routine maintenance work in this area (which was in progress during the time of the inspection) was completed by the end of that working day, although additional time for doing so is allowed under Rule 62-701.500(7)(e).

2.20 Is the frequency, amount and quality of initial cover, as required? 62-701.500(7)(e).

Please refer to our response in 2.13 above. Initial cover is routinely applied more than once per week, instead of the required frequency of once at the end of each week (see Rule 62-701.500(7)(e)). When placed, the initial cover is laid down and compacted to provide a 6 inch cover. However, once placed, natural forces including erosion (wind and water), settlement, soil migration into the underlying waste, and "pumping" from the cyclic force of vehicles may cause the initial cover to degrade, necessitating repairs. Also, because compacted waste generally has an irregular and inconsistent surface, it is difficult to accurately determine how all areas will perform. Repairs to areas of initial cover are a normal part of landfilling operations and are regularly performed at our facility. As required in our Operations Plan, areas in need of repair are routinely fixed within the time period allowed under FDEP rules. Also, as evident throughout the site, mulch is routinely applied to surfaces of the landfill to minimize erosion. Flagging of waste in areas of the initial cover is sometimes observed. When that occurs, additional initial cover is applied to these areas, or the items are picked up and removed. Rule 62-701.500(7)(i) states that some litter may be exposed through the initial cover if it is in traffic areas and away from public view. Accordingly, we believe that our operations and cover activities are in compliance with the rules.

2.23 Is erosion control adequate? There were very few areas of erosion observed at the landfill at the time of the inspection. These isolated patches were primarily located within an overall area along the north slope of Cell 15, measuring approximately 200' x 275'. There were also some minor areas of erosion along the western slope of cell 1. The areas showing signs of erosion were estimated to be less than 1% of the landfill area with intermediate cover. Actual erosion rivulets within these areas were scant. None of the erosion rivulets revealed exposed debris at the bottom. Additional soil cover and mulch have been placed on the areas of the north and west slopes to comply with the requirements of the FDEP Rules and Operations Plan.

FDEP Rule 62-701.500(7)(j) calls for erosion control measures to be employed to correct any erosion which exposes waste or causes malfunction of the stormwater management system. Such measures shall be implemented within three days of occurrence. If the erosion cannot be corrected within seven days of occurrence the landfill operator shall notify the Department and propose a correction schedule. Our operations and the placement of additional soil cover and mulch are in compliance with this rule requirement. Such erosion control measures were undertaken before any waste became exposed (although there were isolated debris items) and before any possible malfunction of the stormwater management system could have occurred. Accordingly, we believe that our operations and erosion control activities are in compliance with the rules.

2.40 Are all specific conditions in the permit being followed? 62-701.320(1). The items raised by the Department have been addressed in a timely manner using the protocols established in our Operating Permit, Operations Plan, and as required by Chapter 62-701. Given our response to the inspection items, we believe we are following and in compliance with all of the specific conditions of such permit.

Thank you for your consideration of these specific responses to the Department inspection. If you or your staff have any questions or need additional information, please feel free to contact me.

Sincerely,
Angelo's Recycled Materials



John P. Arnold, P.E.
Project Manager

xc: Dominic Iafrate
Jeff Rogers