



# Florida Department of Environmental Protection

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Rick Scott  
Governor

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Jonathan P. Steverson  
Secretary

November 25, 2015

E-Mail

mike.gore@mymanatee.org

Mike Gore, Director  
Manatee County Utilities Department  
4410 66<sup>th</sup> Street West  
Bradenton, Florida 34210

RE: Lena Road Class I Landfill, Manatee County  
Application for Renewal of Operation Permit  
WACS No.44795  
Permit No. 39884-021-SO-01

Dear Mr. Gore,

Thank you for the subject Application for Renewal of Class I Operation Permit dated October 27, 2015 and received on October 30, 2015. This application was prepared by Atkins North America, Inc. Based on the Department's review, the application is incomplete at this time. Please provide the information requested below as soon as possible.

- 1) Part R Financial Assurance Part V Item 5 Long Term Care: Leachate Off-site Disposal Costs (62-701.630(3)(c). The disposal cost for 6,063,000 gallons per year of leachate is included in the long term care (LTC) estimate. This estimate is based on a "21 month rolling average" of leachate generation rates. The provided chart includes 20 months of data, five "wet" months (June, July, August, September and October) with higher rainfall with the remaining 15 months generally considered drier. Review of the monthly leachate monitoring reports from 2010 through October 2015 indicates an average leachate generation rate of 14,400,000 gallons per year from Stage I and Stage III with a maximum of 20,560,308 gallons reported in 2010. The LTC cost estimate submitted in February 2010 in support of the prior permit renewal included an estimated annual leachate volume of 28,000,000 million gallons per year. The historical leachate disposal costs provided appear to include a monthly customer charge of \$861.69. This charge is not included in the LTC costs provided for leachate disposal. Please reconcile the discrepancy in the leachate generation rates predicted by the "21-month rolling average" and the leachate monitoring reports from 2010 through October 2015 and adjust the unit

cost for leachate disposal to include the monthly customer charge if this charge is applicable.

- 2) As per 62-701.500(4)(a), please adjust Figure K-2 on page K-13 of your Operation Permit application to reflect county of origin of the waste.
- 3) Florida Jetclean performed high pressure water-jetting of the leachate collection pipe during June/July 2015. Please ask Florida Jetclean to supply .mp4 files of any video inspection records, if applicable, that were collected during this activity
- 4) On Page K-14 of the Operation Plan, please indicate that an attendant will be on duty during all periods of public access.
- 5) As per 62-701-320(15) F.A.C. Please provide a training plan for facility personnel. Please include documentation to verify training of personnel (ie completion certificates).
- 6) On page K2-17 a reference is made to the Manatee County Household Hazardous Waste Collection and Storage Facility Contingency Plan. Please include this in your list of "Documents Included by Reference."

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.

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 permit 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 either Phil Ciaravella at [Philip.Ciaravella@dep.state.fl.us](mailto:Philip.Ciaravella@dep.state.fl.us) 850-245-8742) myself at [henry.freedenberg@dep.state.fl.us](mailto:henry.freedenberg@dep.state.fl.us) or using the signature block information

Sincerely,



*Henry Freedenberg PE, PG*

*Solid Waste Section*

*Florida Department of Environmental Protection*

*2600 Blair Stone Road, MS 4565*

*Jallahassee, Florida 32399*

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850-245-8760

Mr. Mike Gore  
November 25, 2015  
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cc: Bryan White, Manatee County  
John Banks, P.E., Atkins  
Steve Morgan  
Richard Tedder, P.E.

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