



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

REQUEST FOR ADDITIONAL INFORMATION

February 29, 2016

Vista Landfill, LLC
2700 Wiles Road
Pompano Beach, Florida 33073
thawkins@wm.com

Re: First Request for Additional Information (RAI)
Orange County – Solid Waste
Facility Name: Vista Landfill, Class III
Facility ID: 87081
DEP Application No.: 0165969-028-SO-T3

Dear Mr. Hawkins:

Thank you for your application for permit renewal for the above referenced Facility. The Department has assigned DEP Application No. 0165969-028-SO-T3 to the application. A Department staff review of the application and supporting documentation submitted on February 18, 2016, indicates the application is incomplete. Pursuant to the provisions of Rule 62-4.055, F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

If your response to the items requested result in changes or include new calculations, complete and submit appropriate revised pages of the application form and a new professional engineer certification statement. For any material changes to the application, include a new certification statement by the authorized representative or responsible official.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, March 30, 2016, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-4.055(1), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to **DEP_CD@dep.state.fl.us**, with a copy to Laxsamee.Levin@dep.state.fl.us. If the file is very large, you may post it to a folder on the Central District's office's ftp site at: **ftp://ftp.dep.state.fl.us/pub/incoming/Central_District/**. After posting the document, send an e-mail to **DEP_CD@dep.state.fl.us**, with a copy to Laxsamee.Levin@dep.state.fl.us, alerting us that it has been posted.

If you have any questions, please contact Laxsamee Levin by telephone at 407-897-4313 or by e-mail at Laxsamee.Levin@dep.state.fl.us.

Sincerely,



F. Thomas Lubozynski, P.E.
Environmental Administrator
Waste, Air, & Stormwater Permitting
Florida Department of Environmental Protection

v. 1.3

cc:

Deborah Perez, WMIF, dperez@wm.com

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Susan Eldredge, FDEP Tallahassee, Susan.F.Eldredge@dep.state.fl.us

Attached: List of Requested Information

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Facility ID: 87081
DEP Application No.: 0165969-028-SO-T3

All references in the following text refer to the application, dated February 16 and received on February 18, 2016. The pdf submittal contains 100 pages including engineering drawings. The application can be viewed at the following link.

[http://depdms.dep.state.fl.us:80/Oculus/servlet/shell?command=getEntity&\[guid=8.242021.1\]&\[profile=Permitting_Authorization\]](http://depdms.dep.state.fl.us:80/Oculus/servlet/shell?command=getEntity&[guid=8.242021.1]&[profile=Permitting_Authorization])

1. The cover page (Page 1) requested the new permit be issued for a twenty year period. Waste Management Inc. of Florida (WMIF) intends to pay permit renewal fees for the twenty-year period in five-year installments. A subsequent payment of \$4,000 will be made on or before the five-year due date.

Department comments: This is acceptable. The new permit will have due dates for the installment payments.

2. Page 7 Part A.7. and Page 40 Section 2 have conflicting location coordinates. Page 7 Part A.7. is consistent with the renewal permit 0165969-025-SO-31 for Material Recovery Facility. Those are the coordinates we will use for the facility.
3. Page 9 (Part B.1. of the permit application form 62-701.900(1)) states “.....This permit application has been prepared to renew the existing operation permit. Permitted operations include Class III solid waste disposal, material recovery facility, waste tire processing (Small Waste Tire Processing Facility), yard trash recycling, pre-consumer vegetative waste composting, and an active borrow pit contained within permitted footprint.”

Department comments:

- a. Although the list of permitted activities is correct, this permit renewal is not for all of those activities.
- b. The submitted application is for renewal of permit number SO48-0165969-018 and its modification by permits numbers 020, 021, 022, 024, 026 and 027. All permits that will expire on 4/19/2016.
 - Permit numbers 020, 021, 022, 024, 026 and 027 made changes to the operations and water quality monitoring plan for the landfill.
 - Permit SO48-0165969-021 clarified what materials were acceptable for the composting operation. It allows composting of yard trash (including clean wood), manure, animal byproducts, vegetative wastes, and pre-consumer vegetative wastes.
- c. The following permitted operations are not included in this permit renewal:
 - Small Waste Tire Processing Facility (SWTP) has a stand-alone permit 0165969-023-WT-06 that will expire on 9/16/2019.
 - Construct and operate the Vista Material Recovery Facility (MRF) is a standalone permit 0165969-025-SO-31 that will expire on 3/27/2020.

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4. On Page 9 Part B.8, adding only “pre-consumer vegetative waste composting” might be inaccurate.

Department Comment

- a. Unless you tell us you only want to compost “pre-consumer vegetative waste,” the permit renewal will authorize the continued composting operation of yard trash (including clean wood), manure, animal byproducts, vegetative wastes, and pre-consumer vegetative wastes. The annual registration requirement is waived.
 - b. The permit will have a specific condition requiring the annual reporting described in Rule 62-709.320(1)(c), F.A.C.
5. Page 12 Part B.27 provides the Environmental Resources Permit (ERP) number ERP48-0817635-008-EM. Page 40 Section 3 mentions “The current Environmental Resources Permit (ERP) for the landfill surface water management system expires in June 2016.” Did you mean ERP48-0187635-008-EM instead of ERP48-0817635-008-EM? (It expires on 6/10/2016.)
 6. Parts C, D, E, F, G, H, I, K, L, M, N, O, P, Q, and R (starting on Page 13) indicate N/C (no change).

Department Comments:

- a. As mentioned during the pre-application meeting on 1/13/2016, any part of the application that is marked N/C must have a reference (e.g. submittal date, submitted as part of a document/application, section/tab/attachment, etc.). This ensures there is no confusion regarding what document has the information that has not been changed. Also, it allows us to make sure the referenced documents are in our files.
- b. Although Page 100 of Attachment E seems to follow the Rule 62-701.320(10)(c), F.A.C., it does not provide specific reference information.
 - i. Some of the documents listed have been replaced by more recent documents (for example, the Operation Plan listed in the 4th bullet has been updated by the Operation Plan submitted with the document at the first bullet.)
 - ii. Some of documents are not specific enough. (For example, the last bullet lists the application dated 2/17/2011. That application also states “N/C” instead of citing a specific reference.)
- c. We are not requesting that you go thru all N/C entries. However, there are important documents, such as, hydrogeological report, geotechnical investigation information, operation plan, emergency preparedness, and response documentations, etc., must be in the permit application. If a new version is not submitted, the document being relied upon must be specifically identified. Please provide a specific reference for the following documents:
 - i. Page 14, Part D.7, Operation Plan and Closure Plan. Did you mean the plan submitted for Permit -027? The reference information would be “Operation Plan for Vista Landfill, Class III,” revised July 2015 by WMIF.
 - ii. Page 14, Part D.9.b, A vicinity map or aerial photograph no more than one year old showing the facility site and relevant surface features located within 1,000 feet of the facility. Although marked as N/C, an aerial photograph was provided on page 42. Is it supposed to meet this requirement?
 1. The aerial photograph does not have a date to ensure it is less than one year old.
 2. There is no scale to indicate it shows the vicinity within 1,000 feet of the facility.

3. If the aerial photograph on Page 42 is the current document, please provide the reference information to the document being relied upon.
 - iii. Page 14, Part D.9.c. A site plan showing all property boundaries certified by a Florida Licensed Professional Surveyor and Mapper. Although marked as N/C, a site plan was provided on page 43. Is it supposed to meet this requirement?
 1. The site plan on Page 43 is acceptable as a site plan but not as a substitute for the property boundary survey.
 2. The historical survey showing the property boundaries and certified by a Florida Licensed Professional Surveyor and Mapper may be referenced. There is no requirement for a new survey, unless the property changed.
 - iv. Page 25, Part H, the hydrogeological investigation and site report. It is especially important to include an update to the original hydrogeological report regarding the potable wells in the area (Part H.1.i). It appears that the potable wells were mentioned in the second of the last bullet. It needs to state where the information is in that document.
 - v. Page 26, Part I, a geotechnical site investigation report defining the engineering properties of the site. What is the referenced document?
7. Pages 44 to 72 of Attachment A provides a detailed closure cost estimate with justification/cost of third party performing the work. The Department approves the estimated closing cost and 30-year long-term care cost for Cells 1, 2, 3, and 4 as \$4,341,973.02 and \$3,338,143.62 (\$111,271.45 per year x 30 years) respectively.
 8. Pages 73 to 77 of Attachment B provides proof that the leachate collection system was water pressure cleaned. The table below shows when the leachate collection system was cleaned. Waste has been disposed in all four cells.

Cell Number	Leachate Collection System Jet Cleaning Date
1	11/12/2008
2	12/29/2009
3	11/14/2012
4	5/19/2015

- a. Rule 62-701.500(8)(h), F.A.C. states “.....*Existing leachate collection systems shall be water pressure cleaned or inspected by video recording at least once every five years.....*”.
Were the leachate collection pipes in Cells 1 and 2 cleaned or inspected every five years? If yes, please provide documentation. If no, when are they scheduled to be cleaned or inspected?
9. Based on Pages 85 to 98 of Attachment D, the Department accepts the request for a 20-year permit to operate Vista Class III Landfill. The Permit will have a time table to make the remaining three (3) installments over the duration of the permit.