



WASTE MANAGEMENT

2700 NW 48th Street
Pompano Beach, FL 33073

April 11, 2016

Ms. Mary Lawrence
FDEP – Central District
3319 Maguire Blvd, Suite 232
Orlando, FL 32803-3767
mary.lawrence@dep.state.fl.us

RE: National Emission Standards for Hazardous Air Pollutants
Asbestos Notification (40 CFR Part 61.154(j))
45-day Notification
Vista Landfill - Apopka, Florida

Dear Ms. Lawrence:

Vista Landfill LLC (VLL) is submitting this notification as required per 40 CFR 61.154(j). VLL plans to install additional features in accordance with the Vista Landfill Odor Management and Control Plan. As required by the above referenced federal standard, this letter and the attached procedure provide notification of this planned activity and the steps that will be taken to protect both construction personnel and the environment from asbestos exposure.

The Landfill is preparing to construct additional landfill gas odor control features in 2016. This construction is expected to begin in April 2016 and end in December 2016. As part of this project, vertical gas vents will be installed into the waste mass that may impact areas of deposited asbestos material. Based on the initial design, the locations have been adjusted to avoid known asbestos locations; however, some areas of asbestos may be impacted. The certifying engineer has located the new wells not to impact asbestos.

VLL is notifying the Florida Department of Environmental Protection (FDEP) at least 45 working days before the start of construction activities that may encounter asbestos, and identifying an estimated start date and completion date.

VLL will be subcontracting the construction of the landfill gas odor controls to a qualified landfill gas contractor. This contractor will be responsible for making certain the contractor's internal Health and Safety Plan (HASP) is followed, as well as, the procedures detailed in Pine Ridge Recycling and Disposal Facility's Asbestos Management Plan and the Landfill Solid Waste Permit.

In the unlikely chance asbestos is encountered, the following procedures and controls or equivalent measures will be in-place:

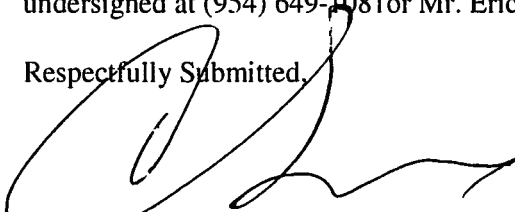
1. The contractor personnel will be trained and qualified to work in an asbestos environment. The contractor's project specific Health and Safety Plan will identify procedures that will be followed in the event that asbestos is encountered. If asbestos is encountered, contractor and site operations personnel within 50 feet of the drilling/digging activities must wear an NIOSH approved respirator. In addition, contractor personnel shall also wear disposable coveralls with a hood, gloves, and foot covering.

From everyday collection to environmental protection, Think Green® Think Waste Management.

2. The contractor will immediately inform the operations supervisor or manager if asbestos waste is uncovered. Once this notification has been received, Operations will prepare a trench adjacent to the active face using a bulldozer. Operations will load and haul the asbestos waste from the project location to the prepared trench using a loader and a dump truck. Upon disposal of the asbestos within the active disposal areas of the landfill, operations personnel will immediately backfill the trench with municipal refuse or soil materials. Emissions will be controlled through the means of careful observation, covering asbestos containing materials during transport to the active disposal areas and if necessary using a water misting unit at the excavation area.
3. Consistent with other accepted asbestos loads, operations will record the position of the re-located waste.

If you have any questions or require additional information on this submittal, please feel free to call the undersigned at (954) 649-1081 or Mr. Eric Parker of VLL at (904) 748-6006.

Respectfully Submitted,



Craig Pelton
Gas Operations Manager

cc: Sheree Grant, VLL
Eric Parker, VLL
Seth A. Nunes, P.E. - Carlson Environmental Consultants, PC
EPA Region 4 – Office of Air Quality