

Memorandum

Florida Department of  
Environmental Protection

To: Susan Pelz, P.E.

From: Simone Core, P.E. *Snc.*

Date: June 8, 2004

Subject: Lena Road Landfill Renewal of Landfill Operation Permit dated April 2004 (received May 14, 2004) prepared by PBS & J.  
Pending Permit No. 39884-010-SO/01

*In box  
June 8/2004*

Application Form 62-701.900(1)

1. DEP Form 62-701.900(1), Part A, item 15, page 5 of 40. Please provide the estimated closing cost in this section of the application form. ✓
2. DEP Form 62-701.900(1), Part D, <sup>if</sup> item 1, page 11 of 40 and page D-1. Please indicate on page D-1, item 1f, ~~that~~ the bodies of water located within the property boundaries also does not discharge from the site to surface waters [F.A.C. Rule 62-701.300(2)(f)].
3. Page E-1 indicates that construction of additional facilities will occur in the next phase. If this construction is part of the permit renewal application, please correct DEP Form 62-701.900(1), Part A, item 2, page 4 of 40 to include construction.
4. Please verify that the new construction identified on page E-1 is in compliance with the prohibitions identified in F.A.C. Rule 62-701.300. *good*
5. Figure E-2, aerial photograph. Please verify that the aerial photograph was taken within one year preceding the application [F.A.C. Rule 62-701.320(7)(f)4]. ✓
6. Please identify on Figure E-5, the 200 foot setback from the wetlands to the proposed waste storage and processing area. ✓
7. The vicinity maps provided in Figures F-1 and F-2 are inadequate. Please provide a vicinity map (not more than a year old) that shows the one-mile radius around the landfill site, clearly identifies nearby roads, water bodies and other significant features and includes a legend identifying the land use associated with the various codes shown on the figures. Please note that all significant features shall be labeled [F.A.C. Rule 62-701.330(3)(a)]. ✓

8. Appendix B, Drawing No. 2, referenced in the December 31, 1997 permit application does not depict cross sections showing original elevations and proposed final contours, cross sections of lifts, fencing or other measures to restrict access and special drainage devices for stormwater control.
9. DEP Form 62-701.900(1), Part F, item 6, page 15 of 40. Please provide up-to-date documentation that an approved laboratory will conduct water quality monitoring for the facility in accordance with F.A.C. rule Chapter 62-160 [F.A.C. Rule 62-701.330(3)(h)].
10. Please provide an updated inventory of all public and private water wells within a one-mile radius of the landfill including the top of casing, bottom elevations, name of owner, age and usage of each well, stratigraphic unit screened, well construction technique and static water level [F.A.C. Rule 62-701.410(1)].

*JRM*

#### Part L – Operations Plan

11. Please revise Section 1.0, page L-1 of the Operations Plan to specify that a “trained” spotter will at the working face each time waste is received and that the spotters will inspect each load from ground level (i.e. not while operating equipment) ✓
12. Figure L-1, page L-2 of the Operations Plan does not identify any “trained” spotters. Please revise this figure to show at least one “trained” spotter at the working face each time waste is received. *good*
13. Please revise page L-6 of the Operations Plan to indicate that asbestos received at the site will be handled in accordance with 40 CFR Part 61.154 [F.A.C. Rule 62-701.520(3)] ✓
14. Please revise Section 2.0 e, page L-8 of the Operations Plan to specify that a “trained” spotter will at the working face each time waste is received and that the spotters will inspect each load from ground level (i.e. not while operating equipment) ✓
15. Section 2.0 g, page L-9 of the Operations Plan indicates that the actual compaction rate is 1,491 lb/cy, however, Table F-1 shows that the design life of the landfill was based upon a compaction density of 1,800 lbs/cy. Please address. *good*
16. Section 4.0, page L-11 of the Operations Plan does not account for all the waste types listed under F.A.C. Rule 62-701.500(4). Please address. *good*
17. Section 6.0, page L-14 of the Operations Plan, please identify who will be responsible for the clean-up of both the small quantity and larger quantity of hazardous waste and whether the individual(s) have the required training. ✓

18. F.A.C. Rule 62-701.500 requires that solid waste at Class I landfills be spread in layers of two feet and compacted to one foot in thickness, in addition the maximum depth of the lift should not exceed ten feet. Section 7.0, page L-16 indicates that the depth of the lift will be no more than twenty feet. Please provide justification for the use of a twenty-foot lift based upon specific operations, daily volume of waste, width of the working face, and good safety practices. *good*
19. The leachate collection system was not shown for Stage II. Only sheet 1 of 2 was provided (Figure L-4). ✓
20. Section 8.0, Page L-21 of the Operations Plan indicates that only one lift station is available for the collection of leachate from Stage III, however, Figure L-4 shows that two lift stations (3A and 3B) serve Stage III. Please address. ✓
21. Section 8.0, Page L-25 of the Operations Plan, please include contingency procedures for the handling of the leachate, if the leachate analysis indicates that it is a hazardous waste. ✓
22. Section 8.0, Page L-25 of the Operations Plan, please provide a copy of the letter from the Public Works Director authorizing the acceptance of the leachate at the wastewater treatment plant. ✓
23. Section 9.0, Figure L-9 of the Operations Plan indicates that gas well 11A exceeded the lower explosive limit on March 25, 2004. Please describe what remedial action has been taken to address this [F.A.C. Rule 60-701.530(3)]. } *JM*

Attachment L-1 Landfill Fill Sequence Plan

24. Please revise the general notes to provide a matching description for each sequence of fill.
25. Please explain and provide supporting justification for the absence of drop inlets and down chute pipes on the north side for sequence 1 and on the west side at final build-out. ✓
26. Please provide both north-south and east-west section views of the proposed fill sequence in Stage III for the next five-year of operation. } *sheet C-9*
27. The terrace at elevation 110.0, should be a fifteen-foot terrace rather than twenty-foot. Please revise sheet C-9.
28. Please provide a fill sequence contour map showing final build-out at elevation 110.0. } *not getting there in this 5 year period*

29. Please provide plan and section view details of the stormwater inlet at the terrace bench.

Attachment L-2 HHW Collection and Storage Facility Operation Plan

30. Please provide a list of personnel that have been trained for the various categories listed under Section 8.1, 8.2 and 8.3. ✓

Part M – Water Quality and Leachate Monitoring Requirements

31. Page M-4 and Figure M-1 differs from Figure L-4 and Appendix A, in terms of the number lift stations that are a part of the leachate collection system for Stage III. Please correct accordingly.
32. Please revise page M-6 to show “total phosphates” rather than “total phosphorus” as the laboratory parameter to be sampled at the surface water monitoring locations [F.A.C. Rule 62-701.510(8)(b)].

jm