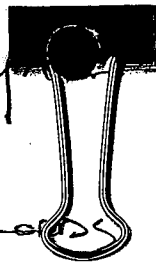


CRAIG Bryan



Ford, Kim

Your copies:

From: Ford, Kim
Sent: Thursday, August 07, 2003 5:28 P
To: Pelz, Susan; Morris, John R.
Subject: conversation with Jim Golden abc

- 1) Conversation Records
- 2) August 5th Letter on Financial
- 3) August 1st Site Visit Report photos

On August 7, 2003 at 4:40pm I spoke with J.C

1. Jim asked for himself and Craig Bryan to we have reviewed and Susan should be part (no.

o discuss documents that come new design. He said

Kim 8/8/03

2. I said that we may want to meet after we get the top of clay contour map. Jim said he can provide the top of clay contour map now. I explained that we will be looking at all the data to find any problems with the contours and to show that we have supporting data for the entire 3' @ 10-6 clay layer. Jim said there may some rock but it is all within clay. I said maybe so but at the location of the rock fragments there may be only 2' of clay above or below the pieces of rock. I explained that we seem to be far apart on resolution because he may be looking at things more conceptually and I seem to be micro-inspecting every inch of the area. Jim agreed and said the clay layer permeabilities are in the range of 10-7 to 10-8.

3. I suggested that he and Jennifer Deal provide the top of clay contour map and if there are rock fragments in it then just say so and if the permeabilities are 10-7 for at least 2 feet of the three feet of clay then say that too. I said that he can fax a draft top of clay contour map with the detailed explanations and we will review it and discuss it next week, but the draft should be complete. Jim agreed.

Kim

Ford, Kim

From: Ford, Kim
Sent: Thursday, August 07, 2003 5:28 PM
To: Pelz, Susan; Morris, John R.
Subject: conversation with Jim Golden about Enterprise CIII

On August 7, 2003 at 4:40pm I spoke with J.G. about the following:

1. Jim asked for himself and Craig Bryan to meet with John and I. I explained that we meet to discuss documents that we have reviewed and Susan should be part of the meeting. I asked if he wanted to discuss some new design. He said no.
2. I said that we may want to meet after we get the top of clay contour map. Jim said he can provide the top of clay contour map now. I explained that we will be looking at all the data to find any problems with the contours and to show that we have supporting data for the entire 3' @ 10-6 clay layer. Jim said there may some rock but it is all within clay. I said maybe so but at the location of the rock fragments there may be only 2' of clay above or below the pieces of rock. I explained that we seem to be far apart on resolution because he may be looking at things more conceptually and I seem to be micro-inspecting every inch of the area. Jim agreed and said the clay layer permeabilities are in the range of 10-7 to 10-8.
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Kim

8/8/2003

Ford, Kim

From: Ford, Kim
Sent: Thursday, August 07, 2003 2:38 PM
To: Pelz, Susan; Morris, John R.
Subject: conversation record for Enterprise CIII conference call

On August 7, 2003 at 11:50am, several items were discussed as part of a conference call with the following persons:
 Jim Golden, Miguel Garcia, and Jennifer Deal (Hartman&Assoc.)
 Craig Bryan (Angelos/Enterprise CIII)
 John Morris and Kim Ford (DEP)

The following items were discussed:

- 1) A "Plan of Action" is required for repairs over limestone areas, signed and sealed by a P.E. and P.G., including the extent of limestone.
- 2) A top of clay contour map was requested to include the extent of limestone (as required by the permit S.C.#5.). I explained that the top of clay must indicate that the clay is continuous at least 36" @ 1x10⁻⁶ cm/sec, and limerock areas would be shown as an encircled area to be repaired (the same for showing the sandy areas too).
- 3) It was agreed that all test pits would be expanded to remove all limerock laterally to expose the clay (36" @ 1x10⁻⁶ cm/sec), and then some of the excavated clayey material would be pushed down over the bottom 6"-12" thick to seal the bottom and repaired later, so the extent of limerock would be shown as part of the top of clay contour map.
- 4) I requested a test pit be dug at each boring that does not indicate the required clay (36" @ 1x10⁻⁶ cm/sec), and each boring in question must be located within the encircled area to be repaired and shown as part of the top of clay contour map.
- 5) We agreed that Cell 15 would be included as part of the certification, and a clay berm would be constructed to separate Cell 15 from Cell 16, and the water in Cell 15 would be pumped into Cell 16 to allow observation and possibly more borings in Cell 15.
 - i) I requested borings along the south part of Cell 15 and between some borings in the north part of Cell 1.
 - j) I requested posts in the bottom of Cell 1 to identify the area to be included as part of the certification, with a benchmark, and a map with the location of the posts for the limits of filling.
 - k) I requested the top of clay contour map for Cells 1 and 15 to be on one drawing.
 - l) We discussed diverting site runoff away from the Cells 1 and 15 open areas.
 - 0) I said I would be at the site before and during repairs of excavated areas.
 - 1) We discussed observing Cell 15 and running a dozer across it to scrape and observe the bottom after the water is pumped out.
 - 2) J.D. mentioned that a new deep well was proposed but may not be needed at this time north of Cell 16. John said he will review.

Kim

Ford, Kim

From: Ford, Kim

Sent: Thursday, August 7, 2003

To: Pelz, Susan; Morris, John R.

Subject: conversation with Craig Bryan about Enterprise CIII

On August 6, 2003 I spoke with C.B. about the following items:

1. S.C. #5 requires a plan of action with the extent of limestone. I said the plan of action must be signed and sealed by a P.E.
2. I requested a topo survey with the locations and dimensions for each test pit (12 test pits were observed on August 1st).
3. I requested a top of clay contour map also showing the locations of each test pit.
4. We discussed separating Cell 15 from Cell 16 by a clay berm, and diverting the surface water from unused areas away from Cells 1 and 15.
5. I requested corner posts and a benchmark in the bottom of cells for certification.
6. I gave C.B. copies of previous correspondence and conversation records.

Kim

Ford, Kim

From: Ford, Kim

Sent: Thursday, August 7, 2003 10:00 AM

To: Pelz, Susan; Morris, John R.

Subject: conversation with Jennifer Deal about Enterprise CIII

On August 5, 2003, I spoke with J.D. J.D.said the CQA repair plan was coming soon.

- 1) I asked for the plan to included the items listed in rule 62-701.400(3)(f), including proctor test on soil from the stockpile for optimum moisture, compaction and permeability, and to propose moisture /density tests.
- 2) I suggested a berm between Cell 15 and Cell 16 if Cell 16 has problems.

Kim

Ford, Kim

From: Ford, Kim

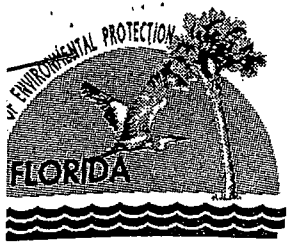
Sent: [REDACTED]

To: Pelz, Susan; Morris, John R.

Subject: conversation with Miguel Garcia about Enterprise CIII

On August 1, 2003 at 10:30am (by cell phone) I spoke with M.G. (Hartman&Assoc.) about Enterprise CIII. **I requested a test pit at each location for each boring where a continuous 36" of 1x10⁻⁶ cm/sec clay was not indicated by the boring log.** I explained that staff told me that some of the 3 feet borings provided as part of the July 25, 2003 "Progress Report #3" did not have a continuous 3 feet of 1x10⁻⁶ cm/sec clay.

Kim



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

Mr. Dominic Iafrate
Angelo's Aggregate Materials, Ltd.
1755 20th Ave. S.E.
Largo, Fl. 33771

August 5, 2003

RE: Enterprise Recycling & Disposal Class III Landfill
Located west of Auton Road, Dade City, Fl.
Financial Assurance Cost Estimates
Permit Nos.: 177982-001-SC and 177982-002-SO, Pasco County

Dear Mr. Iafrate:

The Department is in receipt of a letter dated July 18, 2003 (received July 21, 2003) prepared by Hartman & Associates, Inc., concerning the active life of the facility as it relates to the financial assurance cost estimates. This letter requests a "pay-in" period over the projected 7.2 years of active life of Sequences 1 and 2. However, the cost estimates dated July 8, 2003 only include costs for the closing and long-term care of Cell 1 (approximately 6.08 acres). Based on the calculations included in the July 18, 2003 letter, Cell 1 has an area of approximately 6.8 acres. If the entirety of Sequences 1 and 2 are to be considered when determining the design life of the facility, then revised cost estimates which include the costs of closing and long-term care for Cells 1 through 8 (Sequences 1 and 2) must be provided for review. If Sequences 1 and 2 are to be included, the revised cost estimates will be reviewed in their entirety.

Additionally, based on discussions with Solid Waste staff in Tallahassee, the Southwest District Solid Waste Section has re-evaluated the revised cost estimates dated July 8, 2003 (received July 9, 2003), for closing and long-term care of the Enterprise Recycling Class III Landfill. Unfortunately, after a second review, it is clear that the estimates submitted were approved in error. The estimates submitted are more representative of the closing costs for a C&D debris disposal facility rather than the closing costs for a Class III landfill. Therefore, the cost estimates dated July 8, 2003 are not approved. Additional information is needed to fully evaluate the estimates submitted.

General:

1. Please be advised that Rule 62-701.630(3), F.A.C. and 40 CFR Part 264.142 as adopted by reference in Rule 62-701.630(6), F.A.C., says the closure cost estimate must:
 - a. Equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan;
 - b. Be based on the cost to the owner or operator of hiring a third party to close the facility; and
 - c. Not incorporate any salvage value that may be realized from the sale of hazardous (solid) waste, facility structures or equipment, land, or other assets associated with the facility at the time of partial or final closure.

"More Protection, Less Process"

2. Please clarify the number of acres included. Please provide a reduced size (8 ½ x 11 or 11 x 17) plan sheet which shows the limits of all of the disposal areas and the acreage for each. All of the costs previously submitted will be re-evaluated based on the response to this item. Please clarify if only Cell 1, Phase 4 will be constructed during the first year.

Closing:

3. Slope & Fill. Please provide a quantity and cost for placement of a bedding layer. Since it is unreasonable to expect that all grades and slopes will be maintained exactly as required for closure on a daily basis, a quantity and cost for sloping, compacting and grading the waste must be included. Please specify if the quantities are for material "as-received" or "in-place." If the cost is not for "in-place" material, please account for compaction in the quantity. See also Comment #1.a., above.

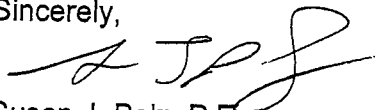
4. Cover Material (Barrier Layer), \$1.15/CY. This cost seems low. Although a quote from Goodwin Brothers construction was provided, the source of the material and permeability of the material was not specified. The clay barrier layer must meet the requirements of Rule 62-701.600(5)(g), F.A.C. Please specify the compaction technique included in the Goodwin Brothers quote. Please be reminded that the compaction and other construction methods must meet the requirements of Rules 62-701.400(7) and (8), F.A.C.

5. Gas Control. Rule 62-701.400(10)(a), F.A.C., requires that landfills that receive biodegradable wastes shall have a gas monitoring and control system designed to prevent explosions and fires and to minimize off-site odors and damage to vegetation. Since Class III landfills receive biodegradable wastes, please include a cost for installation of a gas monitoring and control system. It appears that the cost submitted is for 1 passive vent. Please specify the depth of the passive gas vents.

6. Professional Services. Please provide a detailed estimate which includes development and implementation of the CQA plan required by Rules 62-701.400(7) and (8), F.A.C. Please provide a detailed estimate for the testing cost listed. Please provide information which indicates that the Goodwin Brothers have successfully constructed this type of landfill closure, and that the cost they provided includes all of the activities required by Rules 62-701.400(7) and (8), F.A.C.

The Department requests that two copies, signed and sealed by a registered professional engineer, be provided to the Department's Solid Waste Section, FDEP, Tampa office **within thirty (30) days** of the date of this letter. **In order to expedite the review, please forward all responses concerning financial assurance directly to the writer.** If you have any questions, you may contact me at (813) 744-6100 ext. 386.

Sincerely,



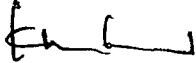
Susan J. Pelz, P.E.
Solid Waste Manager
Southwest District

sjp
cc:

Jennifer Deal, P.E., Hartman & Associates, 201 E. Pine St., Ste. 1000, Orlando, Fl. 32801
Fred Wick, FDEP, Tallahassee
Chris McGuire, FDEP OGC
Kim Ford, P.E., FDEP Tampa

Florida Department of
Environmental Protection

Memorandum

To: Susan Pelz
From: Kim Ford 
Date: August 1, 2003
Subject: Enterprise CIII Site Visit On Friday August 1, 2003

On Friday August 1, 2003 John Morris and Kim Ford met others at the Enterprise CIII landfill. Others at the site:

Angelo (left early)
Craig Bryan
Jennifer Deal, Miguel Garcia, Dale (Hartman & Assoc.)
a contractor's representative

The site visit went as follows:

- 1) We observed the Cell 1. DEP explained that only part of Cell 1 could be included in the certification because the side slope areas on the south and west are not excavated and only the bottom part of Cell 1 can be included.
- 2) We observed standing water in ruts on the north half of Cell 1.
- 3) We went down into the Cell 1 and observed 12 areas of concern- 9 test pits excavated 3'-4' deep exposing limestone and one test pit exposing sand, and two areas not excavated. (see digital photos).
- 4) We observed one location with exposed limestone at the surface on the west side slope not yet excavated. While walking from one test pit to another, a small area of what appeared to be exposed limestone at the surface was observed. (see digital photos).
- 5) Most of the boring locations and test pits were not identified by identification stakes.
- 6) We went to the top and met to discuss several items as follows:
 - a) The surface water ditch along the east side of Cell 1 was not constructed. After review of the sequence of filling in the operations plan we agreed that the east ditch was not needed until Cell # 3 is excavated because all filling will be below grade until then.
 - b) Daily rainfall and daily staff gauge (in the temporary stormwater pond) measurements were requested.
 - c) Weekly water elevations in each installed well and each piezometer were requested.
 - d) The accuracy of the location for each boring was discussed.
 - e) All borings logs and test results were requested.
 - f) Sampling of the temporary stormwater pond was suggested as a requirement until demonstrated that there is no connection to the Floridan aquifer.
 - g) The reason why the temporary stormwater pond is not filling up after rainfall was requested. Is it draining out to the Floridan aquifer, or out the sides and evaporating?
 - h) The depth of borings was questioned because the permitted design requires a "continuous" 3 feet of clay at 10-6 cm/sec. Why are the borings only 3' deep when limestone is hit in the boring?

g) DEP requested to examine each 3 feet core for each permeability. DEP requested most permeabilities in the "worst case locations". DEP discussed and suggested updating the geologic cross-sections across the cells connecting the permeabilities and borings. DEP requested a contour map showing the top and bottom of the "continuous" 3 feet of clay at 10-6 cm/sec, and the limestone.

h) DEP advised that SC#5 requires a "plan of action" for the repairs, and SC#9.c. addresses the design requirement for the "continuous" 3 feet of clay at 10-6 cm/sec and that there have been no requested changes to the design.

i) DEP provided comments on the July 25th progress report #3 as follows:

1. more CQA already done without DEP agreement
2. "worst case" information has not been provided, such as 4 out of the 5 permeability tests appear to have been taken in the best locations not the worst.
3. some descriptions area too vague, such as "and does not appear to be competent limestone connected to the aquifer" and "clay has been encountered below the limestone in most areas".
4. more borings have been completed at locations not agreed on by DEP.
5. borings continue to be only 3 feet deep with limestone fragments and sand without showing the continuous 3' of clay.
6. permeability test results still not provided after 3 weeks.
7. the previously requested survey locations for all borings and all questionable areas not kept up-to-date and not provided.
8. some descriptions are incomplete and misleading, such as "Two (2) of the original 12 boring locations encountered limestone.", however the previous paragraph says 25 borings have been completed.
9. the description of the temporary stormwater pond is inadequate and does not include a description of test results for thickness and permeability, and indicates the observation "of a few small limestone boulders and cobbles" without further investigation and without test results.

j) We discussed the certification of the temporary stormwater pond (Cells 15 and 16). DEP indicated that the variability in the lithology encountered during excavation of Cell 1 has placed additional emphasis on demonstrating that 3 feet of continuous clay is present below the temporary pond as it will be receiving leachate from Cell 1 when disposal begins.

7) We observed the clay stockpile and discussed the location of backfill clay material to be used to repair the excavated areas. We agreed that the clay used for the backfill repairs would have no limestone fragments larger than thumbsize.

KBF

Attachments - selected photos (12 pages)

Ford, Kim

From: Ford, Kim
Sent: Thursday, August 07, 2003 5:28 PM
To: Pelz, Susan; Morris, John R.
Subject: conversation with Jim Golden about Enterprise CIII

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Kim

Key Discussion

8/7/2003

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To: Pelz, Susan; Morris, John R.
Subject: conversation record for Enterprise CIII conference call

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Key Discussion
 For LQA
 Report

8/7/2003

Ford, Kim

From: Ford, Kim

Sent: [REDACTED]

To: Pelz, Susan; Morris, John R.

Subject: conversation with Craig Bryan about Enterprise CIII

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8/7/2003