



HARTMAN & ASSOCIATES, INC.

engineers, hydrogeologists, surveyors & management consultants

201 EAST PINE STREET, SUITE 1000, ORLANDO, FLORIDA 32801

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6/7/01

Kim -
YOUR COPY
FOR THE
PERMIT FILE
John

FACSIMILE TRANSMITTAL

TO: John Morris FROM: Jennifer Deal
FAX: 813-744-6125 DATE: 6/7/01
RE: Correction to PROJECT: HAI# 99-331.01
May 29, 2001 submittal

We are sending you 2 pages, including this cover sheet. These pages are being transmitted as indicated below:

- As requested
- For your use
- For your comments
- For your approval

HARD COPY:

- Will be sent via regular mail
- Will be sent via overnight mail
- Will be sent by facsimile only
- Will be sent by hand delivery

MESSAGE:

John,

The following table is to replace the table in the
May 29, 2001 submittal. Part of the first equation
had inadvertently been deleted. Please call me if
you have any questions. Thank you.

Jennifer

**IF THERE ARE ANY PROBLEMS WITH THIS TRANSMISSION
PLEASE CALL (407) 839-3955, Ext. 168**

TABLE 1
PROPOSED ENTERPRISE RECYCLING AND DISPOSAL FACILITY
DADE CITY, FLORIDA
CALCULATED DILUTION OF POTENTIAL POLLUTANTS

Parameters	Units	Average Leachate* Concentration (C _L)	FDEP Standard or (Guidance) Concentration	Diluted Concentration (C _D)	Number of Landfills with Exceedences
Chloride	mg/L	309	250	54	4
Iron	mg/L	4	0.3	0.7	4
Sodium	mg/L	196	160	35	4
TDS	mg/L	2062	500	363	4
Antimony	μg/L	14	6	2	3
Manganese	μg/L	167	50	29	3
Thallium	μg/L	4	2	1	2
1,2-Dichloroethane	μg/L	9.4	3	1.7	1
Benzene	μg/L	3.5	1	0.6	4
Isopropylbenzene	μg/L	1.3	(0.8)	0.2	2
Methylene chloride	μg/L	9.0	5	1.6	2
Naphthalene	μg/L	15.6	(6.8)	2.7	4
p-Cresol	μg/L	216.0	(35)	38.0	1
Phenols	μg/L	52.0	(10)	9.2	4
Trichloroethylene	μg/L	74.9	3	13.2	1
Vinyl Chloride	μg/L	18.1	1	3.2	2

*Source: Florida Class III Lined Landfill Leachate Data Summary Report
 FDEP May 18, 2000

EQUATIONS:

$$C_D = (C_L * A_c * R + C_b * A_u * R) / ((A_c + A_u) * R)$$

$$C_D = (C_L * A_c * R + 0) / ((A_c + A_u) * R)$$

$$C_D = (C_L * A_c) / (A_c + A_u)$$

ASSUMPTIONS and GIVEN:

$$C_b = 0 \quad \text{mg/L or } \mu\text{g/L}$$

$$A_c = 526,400 \quad \text{ft}^2$$

$$A_u = 2,464,000 \quad \text{ft}^2$$

WHERE:

C_D = Calculated diluted concentration of potential pollutants

C_L = Average leachate concentration of potential pollutants

C_b = Background concentration of potential pollutants

A_c = Area of Cells 1 and 2

A_u = Area of region that is upgradient of Cells 1 and 2 that contributes groundwater

R = Rainfall

053101

Bob

WASTE MANAGEMENT TECHNICAL SUPPORT
ROUTING FORM

PERMITTED FACILITIES

To: John Morris
From: Jim G/ST/01
Date: 6/5/01
Subject: ENTERPRISE CIII

Document Name: _____
Revision Number 02 County: PHSC
Facility Name: _____
Type of Facility: C III LF
Permit Number: _____ Issue Date: _____

Copy of Permit attached: _____
Document submitted in compliance with permit condition. _____

Document subject to permit timeclock. YES

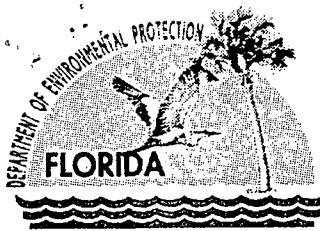
Day 1: 6/1/01
Day 30: 6/30/01

PATS sheet attached: _____
Enforcement Case/CO/NOV/ associated with this site: _____
Files and related documents can be found Attachment in file.

Please review and comment on the technical aspects of the attached document as you deem appropriate. In order to maintain progress with the permit review, please provide comments within 30 days or by 6/25/01.

Comments: The missing info was received on June 1 / 2001 so now all is on the clock

Module _____
Attachments _____



Department of Environmental Protection

KF
JM = RM 4/4/01

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

June 1, 2001

Enterprise Recycling & Disposal
c/o Ms. Ana Carmen V. DeMelo, E.I.
Hartman & Associates, Inc.
201 E. Pine St., Suite 1000
Orlando, FL 32801

RE: Letter Modification to file #51-0172489-001, Pasco County

Dear Ms. DeMelo:

Your request to modify FDEP Permit #51-0172489-001 was received on March 23, 2001, with additional information received on May 10, 2001, and reviewed by Department staff. The modification is for the following:

1. To resize the permitted stormwater management system to accommodate a 100 year/24 hour storm event instead of a 25 year/24 hour event.

The Specific Conditions in the original permit shall also apply to the work authorized by this modification. In addition, the following Specific Condition(s) shall be added to, modified, or deleted from the permit.

#17. Specific Condition #11 is modified as follows:

The permittee shall construct the temporary surface water management system prior to any land clearing or mining activity within the project area. During borrow pit activities, the permittee shall operate and maintain the temporary retention areas to ensure that no adverse water quality or quantity impacts will occur to receiving waters and adjacent lands. During below grade landfilling operations the permittee shall ensure that direct rainfall or stormwater runoff which enters into the borrow pit is managed in accordance with solid waste rules. As the landfilling operation approaches existing grade, the permittee shall construct and operate the permanent stormwater ponds in such a manner as to ensure that runoff from the landfill will not cause adverse water quality or quantity impacts will occur to receiving waters and adjacent lands.

#18. Specific Condition #15 is eliminated in entirety. This condition is redundant and almost identical to Specific Condition #11 and should not have been inserted into the permit.

For the purposes of tracking the application fee a new tracking number, 51-0172489-002, was assigned to this modification request. Please continue to refer to the original permit number when referring to this project in the future.

Since the proposed modification is not expected to result in any adverse environmental impact or water quality degradation, the permit is hereby modified as requested. By copy of this letter and the attached drawings, we are notifying all necessary parties of the modification.

This letter of approval does not alter the remaining Specific Conditions or General Conditions, or monitoring requirements of the permit. This letter and accompanying drawings must be attached to the original permit.

"More Protection, Less Process"

Printed on recycled paper.

Please be advised that this letter modification does not constitute the application for or issuance of a NPDES Stormwater Permit or NPDES Stormwater Pollution Prevention Plan. For additional information regarding this matter please contact Department personnel in Tallahassee at (850) 488-0130 or toll free at (866) 336-6312.

RIGHTS OF AFFECTED PARTIES

This permit is hereby granted unless a sufficient petition for an administrative hearing is timely filed under sections 120.569 and 120.57 of the Florida Statutes as provided below. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the Department's action may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received by the clerk) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Mediation may also be pursued as specified below.

Because the administrative hearing process is designed to redetermine final agency action on the application, the filing of a petition for an administrative hearing may result in a modification of the permit or even a denial of the application. If a sufficient petition for an administrative hearing or request for an extension of time to file a petition is timely filed, this permit automatically becomes only proposed agency action on the application, subject to the result of the administrative review process. Mediation may also change the final disposition of the application. Accordingly, the applicant is advised not to commence construction or other activities under this permit until the deadlines noted below for filing a petition for an administrative hearing or request for an extension of time have expired.

Under rule 62-110.106(4) of the Florida Administrative Code, a person whose substantial interests are affected by the Department's action may also request an extension of time to file a petition for an administrative hearing. The Department may, for good cause shown, grant the request for an extension of time. Requests for extension of time must be filed with the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, before the applicable deadline. A timely request for extension of time shall toll the running of the time period for filing a petition until the request is acted upon. If a request is filed late, the Department may still grant it upon a motion by the requesting party showing that the failure to file a request for an extension of time before the deadline was the result of excusable neglect.

In the event that a timely and sufficient petition for an administrative hearing is filed, other persons whose substantial interests will be affected by the outcome of the administrative process have the right to petition to intervene in the proceeding. Intervention will be only at the discretion of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

In accordance with rules 28-106.111(2) and 62-110.106(3)(a)(4), petitions for an administrative hearing by the applicant must be filed within 21 days of receipt of this written notice. Petitions filed by any persons other than the applicant, and other than those entitled to written notice under section 120.60(3) of the Florida Statutes, must be filed within 21 days of publication of the notice or within 21 days of receipt of the written notice, whichever occurs first.

Under section 120.60(3) of the Florida Statutes, however, any person who has asked the Department for notice of agency action may file a petition within 21 days of receipt of such notice, regardless of the date of publication.

The petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition for an administrative hearing or pursue mediation as provided below within the appropriate time period shall constitute a waiver of those rights.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service

purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests are or will be affected by the agency determination;

- (c) A statement of when and how the petitioner received notice of the agency decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts that the petitioner contends warrant reversal or modification of the agency's proposed action; and
- (f) A statement of the specific rules or statutes that the petitioner contends require reversal or modification of the agency's proposed action;
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts on which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301. Under sections 120.569(2)(c) and (d) of the Florida Statutes, a petition for administrative hearing must be dismissed by the agency if the petition does not substantially comply with the above requirements or is untimely filed.

In addition to petitioning for an administrative hearing, any person who has previously filed a petition for an administrative hearing may pursue mediation. If a written mediation agreement with all parties to the proceeding (i.e., the applicant, the Department, and any person who has filed a timely and sufficient petition for a hearing) is filed with the Department within 10 days after the deadline for filing a petition for an administrative hearing, the time limitations imposed by sections 120.569 and 120.57 shall be tolled to allow mediation to proceed. The agreement must contain all the information required by rule 28-106.404. The agreement must be received by the clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, before the deadline noted above. Pursuing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement.

Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. As noted above, persons seeking to protect their substantial interests that would be affected by such a final decision modified through mediation must file their petitions within 21 days of receipt or publication of this notice as provided above, or they shall be deemed to have waived their right to a proceeding under sections 120.569 and 120.57. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

This action is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above. Upon the timely filing of a petition this order will not be effective until further order of the Department.

This permit constitutes an order of the Department. The applicant has the right to seek judicial review of the order under section 120.68 of the Florida Statutes, by the filing of a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000; and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days from the date when the final order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

Thank you for your cooperation with the permitting process and your interest in protecting the natural resources of the state of Florida. If you have any questions about this letter please contact Randy Cooper, P.E., at (813) 744-6100, extension 470.

Sincerely,
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



for Bob Stetler
Program Administrator
Submerged Lands & Environmental
Resources Program

c: John Larkin, Sid Larkin & Son, Inc., P.O. Box 1747, Dade City, FL 33526
✓ Bob Butera, P.E., FDEP Solid Waste section
FDEP permit file

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this permit, including all copies were mailed before the close of business on 5/31, 2001, to the above listed persons.

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to 120.52(9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

CR Robinson 5/31/01
Clerk Date

HARTMAN & ASSOCIATES, INC.

PRINCIPALS:

Gerald C. Hartman, P.E., DEE
Harold E. Schmidt, Jr., P.E., DEE
James E. Christopher, P.E.
Charles W. Drake, P.G.
Mark A. Rynning, P.E., MBA
Mark I. Luke, P.S.M.
William D. Musser, P.E.

SENIOR ASSOCIATES:

C. Zachary Fuller, P.E.
Marco H. Rocca, C.M.C.
J. Richard Voorhees, P.E., DEE
Roderick K. Cashe, P.E.
Lawrence E. Jenkins, P.S.M.

engineers, hydrogeologists, surveyors & management consultants

May 31, 2001

HAI #99-331.01

Phase 1

File 13.2.1

ASSOCIATES:

Douglas P. Dufresne, P.G.
Jon D. Fox, P.E.
James E. Golden, P.G.
Troy E. Layton, P.E.
Andrew T. Woodcock, P.E.
Daryl C. Walk, P.E.
Grant C. Malchow, M.B.A.
John P. Toomey, P.E.
W. Thomas Roberts, III, P.E.
Michael B. Bomar, P.E.
Mark A. Gabriel, P.E.
George S. Flint, M.P.A.
Stephen J. Rapp, P.E.
Jennifer L. Woodall, P.E.
L. Todd Shaw, P.E.

D.E.P.
JUN 01 2001
Southwest District Tampa

VIA UPS OVERNIGHT

Mr. John R. Morris, P.G.
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

**Subject: Addendum to Response to Request for Additional Information, dated May 2, 2001
Sid Larkin & Son, Inc.
Enterprise Recycling & Disposal Facility
Pending Permit Nos. 177982-001-SC, 177982-002-SO
Pasco County, Florida**

Dear Mr. Morris:

On behalf of Sid Larkin & Son, Inc., Hartman & Associates, Inc. (HAI) is submitting an addendum to your comment requesting a demonstration to indicate that groundwater standards and criteria will not be exceeded at the zone of discharge from the disposal cells. Included in the comment was a reference to the publication *Florida Class III Lined Landfill Leachate Data Summary Report*.

HAI does not consider these data to be representative of typical Class III landfill leachate for the following reasons. The average detections do not include all of the data obtained. Samples that had no detections were not included, therefore causing the averages to be extremely conservative and weighted towards the problem landfills.

The attached Table 1, Calculated Dilution of Potential Pollutants, presents calculated parameter concentrations once dilution has occurred. This dilution is the result of rainfall coming from the upgradient groundwater basin from west to east across the site. These diluted concentrations are considered to be conservative in that dispersion, diffusion, sorption, volatilization, and biodegradation have not been accounted for in the equations. Concentrations of only four parameters remained above standards or target levels after dilution. These include iron, p-cresol, trichloroethylene, and vinyl chloride. The last three of these parameters only occurred in one of two landfills as presented in Table 1. Detections for several of the parameters from the entire list from the FDEP leachate report occurred at only one or two of the landfills. These detections generally indicate mismanagement of the landfill and disposal of waste materials prohibited for disposal at a Class III landfill and should not be considered representative. Please see the following examples.

201 EAST PINE STREET • SUITE 1000 • ORLANDO, FL 32801
TELEPHONE (407) 839-3955 • FAX (407) 839-3790 • www.consulthai.com

ORLANDO FORT MYERS PLANTATION JACKSONVILLE DESTIN

Mr. John R. Morris, P.G.
May 31, 2001
Page 2

Detected Parameter	Common Sources	Landfills with Detections
p-cresol	Disinfectant, herbicides, phenolic resin	1
trichloroethylene	dry cleaning fluid, solvents, degreasers, refrigerants, fumigants	1
vinyl chloride	Solvents, refrigerants	2

Additionally, the landfills with the above detections are older facilities that may not have been managed under the more stringent regulations that new facilities are required to follow. HAI is trying to use reasonable assumptions in our demonstration and believe that the use of such data is unreasonable.

HAI believes the only parameters that should be considered are those that were detected at all four landfills. Since only the detected concentrations were used, the averages are still conservative, but may be considered as more representative of typical Class III landfill leachate. The attached Table 2, Calculated Dilution of Potential Pollutants Detected at All Sites in FDEP Leachate Report, presents these parameters and the diluted concentrations.

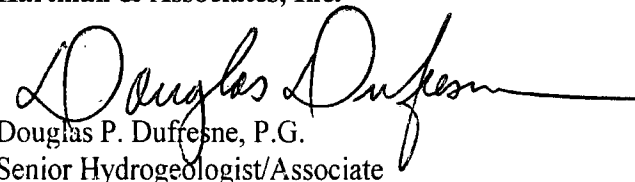
Based on our calculations, the only parameter expected to exceed the State groundwater standards or minimum criteria beyond the zone of discharge is iron, which naturally occurs commonly above 0.3 mg/L concentration in the unconfined surficial aquifer. Therefore, HAI believes that a sufficient demonstration has been provided.

We trust that this demonstration will provide for approval of the above pending permits. Please call us if you have any questions.

Very truly yours,

Hartman & Associates, Inc.


Jennifer L. Deal, E.I.
Engineer


Douglas P. Duffesne, P.G.
Senior Hydrogeologist/Associate

JLD/sas/99-331.01/Ph1/corresp/Morris.dpd

Attachments

cc: Jon Larkin, Sid Larkin & Son, Inc.
James E. Golden, P.G., HAI

TABLE 1
PROPOSED ENTERPRISE RECYCLING AND DISPOSAL FACILITY
DADE CITY, FLORIDA
CALCULATED DILUTION OF POTENTIAL POLLUTANTS

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- R = Rainfall

TABLE 2
PROPOSED ENTERPRISE RECYCLING AND DISPOSAL FACILITY
DADE CITY, FLORIDA
CALCULATED DILUTION OF POTENTIAL POLLUTANTS
DETECTED AT ALL SITES IN FDEP LEACHATE REPORT

Parameters	Units	Average Leachate* Concentration (C _L)	FDEP Standard or (Guidance) Concentration	Diluted Concentration (C _D)
Chloride	mg/L	309	250	54
Iron	mg/L	4	0.3	0.7
Sodium	mg/L	196	160	35
TDS	mg/L	2062	500	363
Benzene	μg/L	3.5	1	0.6
Naphthalene	μg/L	15.6	(6.8)	2.7
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$$C_D = (C_L * A_c * R + 0) / ((A_c + A_u) * R)$$

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