



July 14, 2016

Mr. F. Thomas Lubozynski, P.E.  
Waste & Air Resource Program Administrator  
**Florida Department of Environmental Protection**  
**Central District**  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767

**Re: Provisions for Operating Landfill Gas Extraction Wells Within the Area of Elevated Temperature  
Tomoka Farms Road Landfill**

Dear Mr. Lubozynski

Volusia County (County) and S2L, Incorporated (S2Li) appreciate the Florida Department of Environmental Protection's (Department) assistance in addressing the area of elevated temperature within the Tomoka Farms Road Landfill, and are in receipt of the email to Lenny Marion and Sam Levin dated June 23, 2016. Our understanding of the contents of that email is as follows:

1. The Central District has discussed the issue with the Division of Air Resource Management.
2. The nine wells cited within correspondence from S2Li to the Department dated June 20, 2016 are considered by the Department to be part of the landfill gas management system. Although, the wells are not necessary to control landfill gas emissions as atmospheric pollutants, they are subject to Rule 62-701.530(1), Florida Administrative Code.
3. The Department considers the area of elevated temperatures an unproductive area, as defined within 40 CFR 60.759(a)(3)(ii). The Department considers the nine gas wells in that area as not subject to the requirements of 40 CFR 60 Subpart WWW.
4. The County, at its discretion, may evacuate gas from any or all of these nine wells, provided the extracted gas is treated. Treatment may include burning in a flare. (Note that the County is currently negotiating with a landfill-gas-to-energy vendor, and it is possible the gas extracted from some or all of these wells will be directed to this vendor for its use).
5. The County is not required to collect and maintain data on the gas quantity, quality, or pressure from these nine wells.
6. The Department would appreciate quarterly progress reports as the County continues to address the area of elevated temperature.

With the Department's affirmation of the above, Volusia County will proceed with its efforts to reduce the internal temperature of the area served by the nine wells through the limited withdrawal of gas from these wells, while continuing to evaluate other remedial measures.

Thank you for your continuing assistance.

Very truly yours,

**S2L, Incorporated**

Samuel B. Levin, P.E.  
President

cc: Lenny Marion – Volusia County  
Junos Reed – Volusia County  
Jennifer Stirk – Volusia County  
Debra Reinhart – University of Central Florida