

## Morgan, Steve

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**From:** Morgan, Steve  
**Sent:** Monday, May 02, 2016 1:08 PM  
**To:** 'John Arnold'  
**Cc:** 'John Locklear'; Lisa Baker; Solid Waste Financial Coordinator (Shared Mailbox); Dilmore, Cory; Zhang-Torres; Morris, John R.  
**Subject:** Enterprise Class III LF Lateral Expansion 177982-023-SC-T3 & 177982-024-SO-T3 RAI  
**Attachments:** 177982-023-SC-T3 & 177982-024-SO-T3 RAI.pdf; Enterprise Class III 177982-023-SC-T3 & 177982-024-SO-T3 NOA.docx

Mr. Arnold:

Attached is a PDF copy of the Department's May 2, 2016 Request for Additional Information for the above referenced project.

Please feel free to e-mail or call me if you have any further questions.

Steven G. Morgan, Air & Solid Waste Permitting Manager  
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Florida Department of Environmental Protection  
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13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

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**Permitting Consistency Initiative:** The Florida Department of Environmental Protection is committed to providing efficient, consistent and quality service to the citizens of Florida. In keeping with these objectives, we are pleased to announce ongoing improvements to our permitting process by standardizing and simplifying our documents. During the fall of this year, the Department will begin issuing permitting correspondence formatted consistently throughout all programs. Although the document formatting will look different from past correspondence, please be assured that the content continues to be driven by applicable Rule and Statute. As always, if you have any questions, please contact your local DEP District office.



# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

May 2, 2016

John Arnold, Director of Engineering & Facilities  
Angelo's Recycled Materials, LTD  
855 28<sup>th</sup> Street South  
St. Petersburg, Florida 33712  
[john.phillip.arnold@gmail.com](mailto:john.phillip.arnold@gmail.com)

Re: First Request for Additional Information (RAI)  
Pasco County – Solid Waste  
Facility Name: Enterprise Road Class III Recycling and Disposal Facility  
Site ID: 87895  
DEP Application Nos.: 177982-023-SC/T3 and 177982-024-SO/T3

Dear Mr Arnold:

Thank you for your application for substantial construction and operation modification permits for the above referenced Facility. The Department has assigned DEP Application No. 177982-023-SC/T3 and 177982-024-SO/T3 to the application. A Department staff review of the application and supporting documentation submitted on April 6, 2016, indicates the application is incomplete. Pursuant to the provisions of Rule 62-4.055, F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 90 days of the date of this letter, **July 5, 2016**, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-4.055(1), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are requested to contact this office to set up a meeting to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to [steve.morgan@dep.state.fl.us](mailto:steve.morgan@dep.state.fl.us). If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM/Angelos%20Enterprise/>. After posting the document, send an e-mail to [steve.morgan@dep.state.fl.us](mailto:steve.morgan@dep.state.fl.us) alerting us that it has been posted.

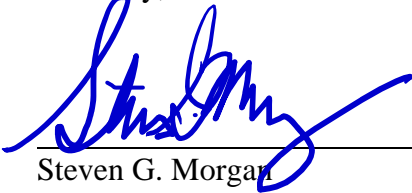
Enterprise Road Class III Recycling and Disposal Facility

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May 2, 2016

Please contact Steve Morgan at 813-470-5754 or by e-mail at [steve.morgan@dep.state.fl.us](mailto:steve.morgan@dep.state.fl.us) to set up the meeting requested above.

Sincerely,



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Steven G. Morgan  
Air & Solid Waste Permitting Manager  
Permitting & Waste Cleanup Section  
Southwest District Office

cc:

John Locklear, P.G., Locklear & Associates, LLC, [john@locklearconsulting.com](mailto:john@locklearconsulting.com)

Lisa Baker, P.E., Locklear & Associates, LLC, [lisa@locklearconsulting.com](mailto:lisa@locklearconsulting.com)

[Solid.Waste.Financial.Coordinator@dep.state.fl.us](mailto:Solid.Waste.Financial.Coordinator@dep.state.fl.us)

Cory Dilmore, P.E., FDEP Tallahassee, [Cory.Dilmore@dep.state.fl.us](mailto:Cory.Dilmore@dep.state.fl.us)

Cindy Zhang-Torres, P.E., FDEP Tampa, [Cindy.Zhang-Torres@dep.state.fl.us](mailto:Cindy.Zhang-Torres@dep.state.fl.us)

John Morris, P.G., FDEP Tampa, [John.R.Morris@dep.state.fl.us](mailto:John.R.Morris@dep.state.fl.us)

Attachments

1. List of Requested Information
2. Notice of Application

### **Attachment 1: List of Requested Information**

Angelo's Recycled Materials, LTD

Facility Name: Enterprise Road Class III Recycling and Disposal Facility

Site ID: 87895

DEP Application No.: 177982-023-SC/T3 and 177982-024-SO/T3

#### **COVER LETTER:**

1. This application indicates that it is for substantial modification of existing Construction Permit 177982-019-SC/T3 and Operation Permit 177982-020-SO/T3. The 10 and 20 year permit durations specified in Rule 62-701.320(9)(d), F.A.C., are not applicable to a permit modification application and therefore the expiration date for these permit modification will be the expiration dates for Permits 177982-019-SC/T3 and 177982-020-SO/T3. The 20-year permit duration is limited to facilities with a leachate control system. The application requests a partial exemption from the Class III LF leachate control requirements. Please verify whether the permittee is applying for a permit renewal or permit modification and the duration of permits being requested by this application, providing supporting information demonstrating that the facility qualifies for that permit duration in accordance with Rule 62-701.320(9)(d), F.A.C.

#### **SECTION 1 - INTRODUCTION:**

2. In the event that your response to Comment #1 above is that this application is for renewal of existing Permit 177982-019-SC/T3 and 177982-020-SO/T3, please specifically list and reaffirm information previously provided information that will not be resubmitted with this application in accordance with the provision of Rule 62-701.320(10)(c), F.A.C.

3. Since the permittee intends to only submit information specific to the modification that revises, consolidates, and/or updates the current permitting documents, the replacement information needs to following the formatting and numbering of the current permit documentation. Please verify and revise this application, as appropriate.

#### **SECTION 2 - APPLICATION FORM #62-701.900(1), [Rule 62-701.320 (7), F.A.C.]:**

4. **Part B.21.:** Please revise this part to indicate that Pond 3 will be an Industrial Wastewater [IW] pond.

5. **Parts B.23:** The pending IW permit application for Pond 3 indicates that that the facility leachate is treated by dilution and evaporation. Please verify and revise this part, as appropriate.

6. **Parts B.24:** Since a portion of the leachate will gravity drain to IW Pond 3, then a portion of the leachate will be disposed into a percolation pond. Please verify and revise this part as appropriate.

7. **Part D.13.:** Based on your response to Comment #1 above, please publish the attached Notice of Application and provide proof of publication to the Department.

8. **Part H.1.g.:** This part is checked N/C. If the response to Comment #1 above, indicates this application represents a renewal of existing Construction Permit 177982-019-SC/T3 and Operation Permit 177982-020-SO/T3, please provide an updated inventory of all public and private wells within a one-mile radius of the site. However, if the response to Comment #1., above, indicates the application represents a modification of existing Construction Permit 177982-019-SC/T3 and Operation Permit 177982-020-SO/T3, please submit revisions to this item of the application form that refer to the information submitted in support of the 2013 permit renewal application (Kelner Engineering, Renewal Application, Part H – Hydrogeological Investigation Requirements, Section H.1.g., and Attachment H-1, received March 20, 2013).

9. **Parts I.1.f.:** This part is checked N/C. However a revised sinkhole potential evaluation was included in the Universal Engineering Report including as Attachment 1 of Appendix C of the Engineering Report. Please verify and revise this part, as appropriate.

**ENGINEERING REPORT, Rule 62-701.320(7)(d), F.A.C.**

10. In many cases, the narrative in the engineering report is also utilized in the operation plan. The operation plan narrative should be revised where appropriate to address comments regarding the engineering report.

11. **§3.2.1:** Please provide documentation of well abandonment for the previously identified two north wells potable wells.

12. **§3.4.1:** Figure 9 is not a FEMA flood map as described in this section. Please verify and revise this section and Figure 9 as appropriate.

13 **§3.5:** Figure 10 is not a USDA-SCS Soil Survey Map as described in this section. Please verify and revise this section and Figure 10, as appropriate.

14. **§3.7:** Please revise this section to specifically describe the specified permeability of the clay layer material [ $1 \times 10^{-7}$  cm/sec] as indicated for the current facility permits.

15. **§3.8:**

a. **Phase Sequence 1:** The description in this section appears to assume that construction of Cell 7 has been completed and certified which is not the current condition of the facility. In addition, the Cell 7 construction details presented on Drawings C-7, C-11, and C-12 of the 2012 Kelner Engineering Plan Set do not appear to be included in the plan set provided with this application. Please verify and revise this section and the plan set, as appropriate.

b. **Phase Sequence 1:** The currently permitted design for Cells 1-7 and 15 is a maximum 4H:1V slope from elevation 125' to 170' (see Permit Modification Nos. 117982-021-SC/IM & 177982-022-SO/MM). Please revise this section accordingly.

c. The phasing sequence narrative and filling sequence drawings in the Plan Set should describe and show the extent of filling in Cell 7 before proceeding to Cell 16; the extent of filling in Cell 16 before proceeding back to filling Cells 1-7 and 15; and the sequence of filling over Cells 1-7, 15, and 16 to final elevations. Please revise this section and the Plan Set, as appropriate.

d. Please explain the statement “Use culverts, berms, or best management practices...” in this section and Section 3.8.2.

16. **§3.8.1:** Please revise this section to clarify that Drawing C2.00 (inclusive of Cell 13-14) is beyond the scope of this application; is provided as a conceptual final buildout closure plan for financial assurance calculations purposes, and that a final closure drawings for Cell 1-7 and 15-16 will be provided in the event that Cells 13 and 14 are not permitted for construction and operation in the future.

17. **§3.8.2:** The statement that filling will start at the 2H:1V slopes appears only applicable to Cell 7. Please verify and as applicable, revise this section also identify where filling will begin in Cell 16.

18. **§3.9:** Please revise this section to remove the specific references to Drawings C2.00 and C2.10 of the Plan Set (see Comment #16. above).

19. **§3.10.1.2:** This section refers to Figure 3-14 (provided in Appendix 3-C of the 2012 permit renewal application submitted by Kelner Engineering) for construction details of the proposed landfill gas probes. As the replacement probes are proposed to be located in proximity to the landfill property boundary, the 18-foot length of perforated pipe installed at the bottom of a 20-foot deep gas probe may not be adequate to ensure the bottom of the perforated section of the gas probe extends to the bottom elevation of the adjacent waste disposal cell. Please submit supplemental information that provides proposed elevations of the top and bottom of the perforated section of each proposed gas probe and the estimated land surface of each proposed gas probe as a replacement for Figure 3-14.

20. **§3.10.1.5:** Please provide the supporting information, calculations, and or assumptions utilized in support of the proposed location of gas vents shown on Drawing C2.00, concentrated at the highest level of the facility, rather located a roughly equidistant locations throughout the entire footprint of the closed facility, as depicted on Sheet C-8 of the 2012 Kelner Engineering Plan Set.

21. **§3.10.2.:**

a. Leachate will also continue to be conveyed to the portion of the existing temporary stormwater located in conceptual future Cell 14. Please verify and revise the narrative in this section accordingly.

b. Please provide specific design and operation descriptions of how leachate is conveyed from Cells 1-7 and 15 to Pond 3 while Cell 16 is being constructed and how leachate is conveyed to Pond 3 during Cell 16 operation without causing disposal of waste in water.

c. Please explain how “the controlled method of waste screening” impacts leachate generation and control at the facility.

**APPENDIX A – 2014 PLAN SET (Rule 62-701.320(7)(f), F.A.C.)**

**22. Drawing C0.03:**

- a. Please verify whether gas probes GP-11 and GP-14 will continue to be existing gas probes or will be abandoned and replaced as part of Cell 16 construction (per Section 3.10.1.1 of Engineering Report) and revise this drawing as appropriate.
- b. Please verify whether gas probes GP-12R and GP-13R depicted on this drawing are existing or proposed replacement gas probes (per Section 3.10.1.1 of Engineering Report) and revise the drawing, as appropriate.
- c. Please verify whether gas probes GP-1 through GP-5 and GP-16 depicted on this drawing are existing or proposed future gas probes (per Section 3.10.1.1 of Engineering Report) and revise the drawing, as appropriate.
- d. Please provide sections through Cell 16, each of the three sets of monitor wells (MW-4/MW-4B, MW-5AR/MW-5BR, MW-6/MW-6B), and Pond 3 to show the following:
  - the lateral distance from the edge of waste in Cell 16 to the monitor well pairs
  - the lateral distance from the monitor well pairs to the top of bank of Pond 3

**23. Drawing C0.04:** Please revise this drawing to also include the cell floor grading for Cell 7.

**24. Drawings C1.00 / C1.10 and C2.00 / 2.10:** The operating and closure contours and slope depicted on these sheets above elevation 125' appear inconsistent with both the fill sequence descriptions in Section 3.8 of the Engineering Report and the currently permitted contours and elevations for Cells 1-7 and 15 (see Permit Modification Nos. 117982-021-SC/IM & 177982-022-SO/MM). In addition, transitioning from a 4H:1V side slope in Cells 5 and 15 above elevation 125' to a 3H:1V side slope in Cell 16 appears problematic. Please verify and revise these drawings, as appropriate.

**25. Drawings C1.00:** Please verify that the proposed contouring of the south side slope of the temporary stormwater pond to elevation 89' depicted on this sheet will not prevent leachate from draining from the existing disposal cells to the temporary stormwater pond.

**26. Drawing C2.00:**

- a. Conceptual Closure Berm: The current stormwater management side slope conveyance system design includes closure berms and drop inlet at each side slope bench (i.e. elevations 125' and 150') and not at elevation 170'. Please verify and provide a revised detail, similar to the current detail provided on Drawing C-15 (see Permit Modification Nos. 117982-021-SC/IM & 177982-022-SO/MM).

**27. Drawing C3.00:**

- a. Detail 1: This detail appears inconsistent with Drawings C2.00 and C2.10. Please verify and revise as appropriate.

- b. Detail 2: It is unclear where the temporary diversion swale will be constructed for Cell 16 and where the stormwater will be diverted to. Please explain and revise this drawing and/or Drawings C1.00 and C1.10, as appropriate.
- c. Details 5 and 6: There are not north and east clay side slopes proposed for the construction of the Cell 16 bottom liner. Please verify the purpose of these details and/or remove these details, as appropriate.

#### **APPENDIX B – FIGURES (Rule 62-701.320(7)(f), F.A.C.)**

28. It is unclear which currently permitted and valid figures are being replaced by the figures in Appendix B and which are remaining. Please verify and revise Appendix B, as applicable.
29. **Figure 5**: Please verify the presence of an off-site potable wells west and southeast of the site, as depicted on Figure S-1 provided with the engineering report for the current facility permits and revise this figure, as applicable.

#### **APPENDIX C – LINER SYSTEM REQUIREMENTS EVALUATION (62-701.340(2)(b), F.A.C.)**

30. **§6.2**: ¶2 of this section indicates ground water data was compiled for the semi-annual events conducted between October 2005 and September 2015 to assess the change in water quality over time. Please submit revisions to the graphs and the box-and-whisker plots presented in Attachment 2 to include the results reported through September 2015. It appears that Attachment 2 contains two sets of graphs and box-and-whisker plots; please indicate if the second set of graphs and box-and-whisker plots provide different information and submit revisions to Attachment 2, as appropriate.
31. **§6.2.2**: Please note that the following comments regarding sub-sections titled “Dissolved Oxygen,” “Total Dissolved Solids,” and “Iron” were included in the comments memorandum prepared by John Morris, P.G., dated October 30, 2015 regarding the draft Liner System Requirements Study Report dated September 2015. It does not appear that these comments were addressed in the revised Liner System Requirements Study Report dated March 2016. Please address the following regarding ground water quality reported for surficial aquifer monitor wells:
  - a. The sub-section titled “Dissolved Oxygen” indicated the variation in D.O. values may be attributed to the on-going excavation and cell construction activities at the site – materials excavation may result in re-oxygenation of lower portions of the surficial aquifer and cell construction/waste placement may result in reduction in D.O. values. The “Liner Report” does not demonstrate whether D.O. values recorded during well purging for the semi-annual sampling events is a reflection of ambient conditions or is influenced by purging activities. To provide additional characterization of the variability in D.O. values reported for the surficial aquifer wells, the information presented in Section FS 2212, Item #3.5 of the Department’s Standard Operating Procedure #FS 2200 needs to be collected. Specifically, the use of a down-hole oxygen probe to collect D.O. readings within the screened interval of the monitor wells prior to the initiation of well purging activities should be completed.  
SOP #FS 2200 can be accessed on the Department’s web site at the following link:  
<http://www.dep.state.fl.us/water/sas/sop/sops.htm>



b. The sub-section titled "Total Dissolved Solids" indicated the elevated TDS concentrations reported for well MW-4 are most likely a naturally high mineral content relative to the other wells, however no information was provided to explain why the TDS concentrations are lower at the adjacent surficial aquifer monitor wells. It is also noted that while well MW-4 was installed in 2006, it was first successfully sampled during October 2009. Therefore, no ground water quality data is available to characterize "background" conditions prior to landfilling activities and the operation of the temporary stormwater pond.

c. The sub-section titled "Iron" indicated the change in D.O. and ORP of water directly relates to change in redox conditions and variation in iron concentrations. This sub-section also indicated it was possible that iron exceedances were related to reducing conditions resulting from landfill construction and site earthwork activities and not an actual release from the waste placed in the landfill. This section did not provide plots of iron concentration vs. D.O., or iron concentrations vs. ORP to demonstrate this relationship.

32. **§6.2.3:** Please note that the following comments regarding sub-sections titled "Overview," pH," "Dissolved Oxygen," and "Iron" were included in the comments memorandum prepared by John Morris, P.G., dated October 30, 2015 regarding the draft Liner System Requirements Study Report dated September 2015. It does not appear that these comments were addressed in the revised Liner System Requirements Study Report dated March 2016. Please address the following regarding ground water quality reported for Floridan aquifer monitor wells:

a. The sub-section titled "Overview" referenced the installation of new background well BW-1B. It is noted that the Ground Water Quality Plots provided in Appendix C omitted results reported for well BW-1B.

b. The sub-section titled "pH" described the period of time pH values were reported to exceed 8.5 S.U. at well MW-7BR, however the increasing pH values reported at well MW-16B (reported at 10.48 S.U. during the September 2015 event) were not discussed.

c. The sub-section titled "Dissolved Oxygen" indicated D.O. levels in Floridan aquifer wells ranged from 0.09 to 8.1 mg/L. See Comment #31.a, above, regarding supplemental characterization of D.O. values using a down-hole oxygen probe prior to initiation of well purging activities.

d. The sub-section titled "Iron" indicated the lack of oxygenation can result in the dissolution of naturally-occurring iron, resulting in elevated concentrations in ground water. See Comment #31.c. above, regarding submittal of plots of iron concentrations vs. D.O., and iron concentrations vs. ORP to demonstrate this relationship.

33. **§6.2.4:** ¶2 of this section refers to the potable well survey provided in Attachment 3. The figure provided in Attachment 3 (titled "Potable Well Location Map") was compared to the locations depicted on Figure S-1 (titled "Potable Water Wells") presented in Attachment H-1 of the Engineering Report submitted by Kelner Engineering dated March 2013 in support of the permit renewal application. It is understood that the private well located north of conceptual Cell 13 has been abandoned, however the two other wells on Figure S-1 (in the citrus grove west of conceptual Cell 11 and off-site to the southeast of Cell 2) have been omitted. Additionally, the on-site supply well located southwest of Cell 7 is not

presented on the figure in Attachment 3. Please review the omitted well locations and submit revisions to Attachment 3 as appropriate.

**Attachment 1 – Universal Engineering Report (Rule 62-701.410, F.A.C.)**

34. **Appendix A:** The figure titled, “Site Aerial Photograph” appears outdated and not reflective of the proposed facility. Please verify and revise as appropriate.

35. **Appendix B:** The boring designation on the figure titled, “Boring Location Map” are illegible on both the electronic and paper copies of this figure submitted with this application. Please provide a legible copy of this figure.

36. **Appendix C:** §2.3 (Cell 16 Borings and Geologic Cross Sections), sub-section “Geologic Summary” described a few borings which show a few one to two foot thick layers of soft sediments. This section concluded: “However, in all borings dense to very dense sediments have surrounded these softer soil layers in a stable setting.” It does not appear that this conclusion accurately describes the low blow counts reported at the bottom of boring B-21 (N-value @ 4), boring B-33 (N-value @ 3), and boring DCL01-13 (N-value @ 3). Please revise this section as appropriate.

**APPENDIX D – GROUNDWATER MONITORING PLAN (Rule 62-701.510, F.A.C.)**

37. **§1.:** This section refers to the ground water monitoring network described in Table 1 and Figure 1. Please submit revisions to address the following:

a. Figure 1:

- Please revise the label to refer to existing well MW-6
- Please include a depiction of the lateral extent of the zone of discharge around the disposal footprint (Cells 1 through 7, Cell 15 and Cell 16). As indicated in Appendix 3, Para. 2.a., of permit #177982-020-SO/T3, the zone of discharge extends horizontally 100 feet from the limits of the landfill disposal areas or to the property boundary, whichever is less.

b. Table 1:

- Please revise the “Notes” column to indicate existing well MW-15B will be abandoned in conjunction with Cell 7 construction
- Please revise the “Notes” column to indicate existing well MW-16B will be abandoned in conjunction with Cell 7 construction
- Rule 62-701.510(3)(b), F.A.C., indicates the following: “If site-specific conditions require installation of compliance wells within the zone of discharge, then a confirmed exceedance of a ground water standard above background at such wells will be considered a violation of that standard.” Based on the response to Comment #22.d., above, it appears appropriate to designate wells MW-4/MW-4B, MW-5AR/MW-5BR, and MW-6/MW-6B as compliance wells. Please submit revisions to Table 1 to reflect the compliance well designation for these wells.

38. **§1.a.:** Please submit revisions to indicate well abandonment shall be performed in accordance with the requirements of Rule 62-532.500(5), F.A.C.

39. **§1.d.:**

a. It appears that existing monitor wells MW-4/MW-4B and wells MB-6/MW-6B will remain in place during construction of Cell 16 and Pond 3. Please describe how these well pairs will be protected during construction activities.

b. It is indicated in Table 1 that replacement wells MW-5AR/MW-5BR will be installed within 60 days of permit modification issuance. Please describe how this replacement well pair will be protected during construction of Cell 16 and Pond 3.

c. ¶2 of this section refers to construction details for proposed monitor wells presented on Figure 2 (titled “Proposed Surficial Aquifer Monitor Well Detail”) and Figure 3 (titled “Proposed Floridan Aquifer Monitor Well Detail”). To ensure the proposed surficial and Floridan aquifer monitor wells are adequately constructed for the targeted interval, please submit revisions to Figures 2 and 3 to specify the elevations of the top of the well screen and the bottom of the well screen at each proposed monitor well based on site-specific lithology and water level data. For proposed surficial aquifer wells the elevation of the top of the clay confining unit at the base of the surficial aquifer and the historic range of ground water elevations at adjacent monitor wells or piezometers should be summarized. For proposed Floridan aquifer monitor wells the elevation of the top of limestone sediments and the historic range of ground water elevations at adjacent monitor wells or piezometers should be summarized. Please submit revisions to this section to indicate that the ground surface elevation shall be established at each proposed monitor well location prior to the initiation of well installation.

40. **§1.e.:** The Department acknowledges the indication that Ponds 1, 2 and 3 do not have off-site discharge associated with the 100-year flood event and therefore routine surface water monitoring is not required. Please note that it is the Department’s intention to retain the current surface water monitoring requirement in the event of a surface water discharge event from the stormwater management system (refer to Appendix 3, Para. 8.a., and Para. 8.b., of Permit #177982-020-SO/T3).

**APPENDIX E – SLOPE STABILITY ANALYSIS (Rule 62-701.410, F.A.C.)**

41. As discussed in Comment #24 above, filling to a 3H:1V side slopes above elevation 125’ may be problematic when the permitted side slopes of adjacent disposal cells is 4H:1V. Please verify and revise the assumptions, calculations, and/or conclusions presented in this report, as applicable.

42. **Reference Documents:** In multiple discussions with the permittee and their consultants, the Department has expressed our opinion that the soil borings from the 2000 geotechnical report could not be relied upon as representative of the site subsurface soils layers and conditions. As a result, the January 29, 2016 Universal Engineering Geotechnical Exploration Report utilized to evaluate the liner system requirements for Cell 16 and re-evaluated the Cell 16 subsurface, relied primarily on subsurface investigations and reports generated after 2003. Please provide supporting justification why this report relied upon boring logs generated as part of the 2000 geotechnical report to characterize the Cell 16 subsurface and/or revise this report accordingly to utilize more reliable site information.

43. Slope Stability Model Analysis: As indicated by Comment #24 above, the Locklear & Associates Plans that were "... used as the basis for modeling the slope geometry" appear incorrect. Please verify and revise this analysis, as appropriate.

**APPENDIX F – CLOSURE AND RECLAMATION PLAN (Rule 62-701.600, F.A.C.)**

44. **Appendix F-1:**

a. It appears that the cost estimates provided utilized the cost estimates information, calculations, and/or assumptions from the 2014 approved revised estimates submitted in support of Permits 177982-019/SC/T3 and 177982-020-SO/T3 and prorated quantities based the addition of Cell 16. While the Department does not object to this approach, the final calculated closing and long-term care costs should be inflation-adjusted based on the 2015 and 2016 inflation factors (1.015 & 1.014 respectively). Please revise the cost estimates accordingly.

b. Long-Term Care – Groundwater Monitoring : It appears that the assumed number of monitor wells in this section (21 wells) may be inconsistent with the number of wells proposed in the Groundwater Monitoring Plan provided in Appendix D (16 wells). Please verify and revise the long-term care costs accordingly.

**APPENDIX G - OPERATIONS PLAN (Rule 62-701.500(9), F.A.C.):**

45. **§5.4:** Based on the listing of unpainted and untreated wood as acceptable wastes, painted and treated wood should be added to the list of unacceptable waste materials for disposal at this facility. Please verify and revise this section, as appropriate.

46. **§5.8:** The facility is not currently a registered Source-Separated Organics Processing Facility and the Operation Plan does not appear to include procedures for storage and processing of wood waste in accordance with Rule 62-709.320, F.A.C. Please revise this section to reference the facility's Source-Separated Organics Processing Facility registration or to include procedures for storage and processing of wood waste in accordance with Rule 62-709.320, F.A.C.

47. **§5.9:** This section does not appear to discuss how the facility operators/spotters will determine that wood received at the facility is CCA treated wood. Please revise this section accordingly.

48. **§8.0:** Please revise this section consistent with revisions made to the Engineering Report in response to this letter.

49. **Attachment 6:** Based on review of the training certificates in Attachment 6, all of individuals training certifications are expired. Please verify and revise this attachment, as appropriate.

**APPENDIX I - CONTINGENCY PLAN (Rules 62-701.320(7)(e)2. & (16), F.A.C.):**

50. **§1.1 & §1.4:** The FDEP Southwest District phone number has recently changed to (813) 470-5700. Please revise these sections, accordingly.

**Attachment 2: Notice of Application**

62-110.106(5). Notices: General Requirements.

Each person who files an application for a Department permit or other notice as may publish or be required to publish a notice of application or other notice as set forth below in this section. Except as specifically provided otherwise in this paragraph, each person publishing such a notice under this section shall do so at his own expense in the legal advertisements section a newspaper of general circulation (i.e., one that meets the requirements of sections 50.011 and 50.031 of the Florida Statutes) in the county or counties in which the activity will take place or the effects of the Department's proposed action will occur, and shall provide proof of the publication to the Department within seven days of the publication.

62-110.106(6). If required, the notice shall be published by the applicant one time only within fourteen days after a complete application is filed and shall contain the name of the applicant, a brief description of the project and its location, the location of the application file, and the times when it is available for public inspection. The notice shall be prepared by the Department and shall comply with the following format:

**State of Florida  
Department of Environmental Protection  
Notice of Application**

The Department announces receipt of applications for construction and operation permit modifications from Angelo's Aggregate Materials, Ltd. for lateral expansion of a Class III landfill, subject to Department rules, at the Enterprise Class III Recycling and Disposal Facility, located at 41111 Enterprise Road, Dade City, Pasco County, Florida.

This application is being processed and is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, Southwest District Office, 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926.