Florida Department of Environmental Protection

Southwest District Office
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Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

April 19, 2018

VIA EMAIL ONLY: john.phillip.arnold@gmail.com

John Arnold, P.E.
Director of Engineering & Facilities
Angelo's Recycled Materials, LTD
855 28th Street South
St. Petersburg, Florida 33712

RE: Groundwater Monitoring Technical Report 2015 - 2017, dated March 19, 2018
Enterprise Road Class III Recycling and Disposal Facility
41111 Enterprise Road, Dade City, Pasco County, Florida 33525
WACS Facility ID No. 87895
FDEP Permit Nos. 177982-019-SC/T3 and 177982-020-SO/T3

Dear Mr. Arnold:

The Florida Department of Environmental Protection (Department) has reviewed the above-referenced report, submitted by Locklear & Associates, Inc. (L&A) for the Enterprise Road Class III Recycling and Disposal Facility. The Department's comments are summarized on the following attachment. The Department's comments are summarized on the following attachment.

If you have any questions, please contact me by email at justin.chamberlain@dep.state.fl.us or by phone at (813) 470-5725. In an effort to reduce costs and waste, the agency is requesting all future submittals be sent in electronic format. Please reference WACS Facility ID No. 29-43384 in your communications.

Sincerely,

Justin A. Chamberlain, P.G.
Professional Geologist I
Permitting and Waste Cleanup Program
Florida Department of Environmental Protection

cc: John Locklear, P.G., L&A (via email: john@locklearconsulting.com)
Walker Wrenn, P.G., L&A (via email: walker@locklearconsulting.com)
Steven Tafuni, SWD FDEP (via email: steven.tafuni@dep.state.fl.us)
Alexis Black, SWD FDEP (via email: alexis.black@dep.state.fl.us)

Attachment: Comments for Groundwater Monitoring Technical Report 2015 - 2017, dated March 19, 2018

The following comments are provided:

1) The above-referenced report generally complies with Appendix 3 Condition #11 of the specified permit and with Paragraph 62-701.510(8)(b), Florida Administrative Code (F.A.C.) with the following exceptions:

    a) Paragraph 62-701.510(8)(b)1., F.A.C.:
        1) Include hydrographs for all monitor wells – Hydrographs were not provided for all of the monitoring wells in the monitoring well network. See Comment #2.a. below.

    b) Paragraph 62-701.510(8)(b)2., F.A.C.: Trend analyses of any monitoring parameters consistently detected – No trend analyses was provided for those parameters consistently detected in the monitoring wells. Groundwater chemistry graphs located in Attachment 5 provide time series plots only with no trendlines provided. Please include a discussion of trends in the response requested below.

    c) Paragraph 62-701.510(8)(b)3., F.A.C.: Comparisons among shallow, middle, and deep zone wells if multiple zones are monitored – No comparisons between water quality of the surficial aquifer and the Floridan aquifer were provided. Please include a discussion of trends in the response requested below.

2) *2.1 GROUNDWATER CONTOURING:*
    a) It is noted that monitoring well MW-1A, was consistently dry over the period of review and that groundwater elevations measured in monitoring wells MW-8, MW-9, MW-10 were near the bottom of well screen and may not represent the actual surface of the surficial aquifer. However, the report did not include hydrographs for the remaining surficial aquifer monitoring wells and piezometers. Monitoring wells BW-1A, MW-3, MW-4, MW-5A, MW-6, MW-7A, MW-11, MW-12A, MW-19A, P-4, P-6, and P-11 did measure apparent water table conditions for a majority of the period of review. Please submit hydrographs for the referenced monitoring wells

    b) Table 2.1 was described as presenting recorded fluctuations of groundwater elevation in the Floridan aquifer. However, Table 2.1 presents maximum/minimum groundwater elevation data from both the surficial aquifer and Floridan aquifer.

3) *2.2 GROUNDWATER FLOW VELOCITY:*
    a) Calculations of groundwater flow velocity for the surficial aquifer was not provided. Please provide these calculations.

    b) The calculations of groundwater flow velocity for V_{max} and V_{min} for the Floridan aquifer using the equations and numbers provided do not match the listed answers. Based on the equations provided:

        1) V_{max} should equal 0.00200 ft./day or 0.73 ft./year.

        2) V_{min} should equal 0.000801 ft./day or 0.29 ft./year.

c) The report states, *"the flow velocity in the 2006 Hydrogeological Investigation ranged from 3.0 to 5.1 feet/year."* However, the Landfill Hydrogeological Investigation and Groundwater Monitoring Plan, prepared by Jones Edmunds & Associates, dated November 2006 indicated the flow velocities for the Floridan aquifer ranged between 1.1 and 58.4 feet/year. Please explain.

4) Appendix 3 Condition #11 of the specified permit indicates the technical report shall include assessment of the effectiveness of the landfill design as related to the prevention of groundwater and surface water contamination. It does not appear that this was provided. Please provide a response that discusses the effectiveness of the landfill design for groundwater and surface water contamination prevention.

Please provide a response to the comments provided above to the Department within 30 days of receipt of this letter or no later than May 21, 2018. Should you have any questions or concerns, please contact me by email at justin.chamberlain@dep.state.fl.us or by phone at (813) 470-5725.