



Florida Department of Environmental Protection

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Southwest District Office
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Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

March 20, 2018

John Arnold, P.E.
Director of Engineering & Facilities
Angelo's Recycled Materials, LTD
855 28th Street South
St. Petersburg, Florida 33712
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
DEP Permit Nos.: 177982-019-SC/T3 and 177982-020-SO/T3
Site ID: 87895

DEP Application Nos.: 177982-025-SC/T3 and 177982-026-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 Nos. 177982-025-SC/T3 and 177982-026-SO/T3 to the application. A Department staff review of the application and supporting documentation submitted on February 20, 2018, 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 45 days of the date of this letter, **May 5, 2018**, 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.

Enterprise Road Class III Recycling and Disposal Facility

Page 2 of 13

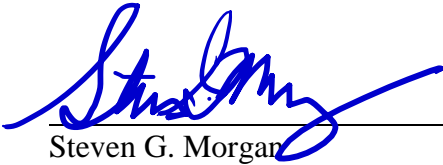
March 20, 2018

Please submit the response in electronic format to 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 alerting us that it has been posted.

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

Sincerely,



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

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Attachments

1. List of Requested Information

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.: 177982-025-SC/T3 and 177982-026-SO/T3

INTRODUCTION:

1. **Rule 62-701.340(2)(b), F.A.C.:** This permit application was prepared based the assumption that the information provided in the application, including the "Liner System Requirements Evaluation" provided in Section 2, Appendix G-1 meets the criteria of Rule 62-701.340(2)(b), F.A.C. to demonstrate exemption of some or all the requirements for liners, leachate control, and water quality monitoring in Rule 62-701.400, subsections (3) and (4) and Rule 62-701.510, F.A.C. Based on the comments provided below, the information provided with this application, including but not limited to Appendix G-1, does not currently meet the criteria for exemption. In the event that the applicant is unable to provide adequate additional information to support this exemption, please revise this application, as applicable, to propose a liner and leachate control system and water quality monitoring for Cell 17 that meets the Class III landfill requirements of Rules 62-701.400(3) & (4) and 62-510, F.A.C.

2. Permit Nos. 177982-023-SC/T3 and 177982-024-SO/T3 were substantial modification of Construction Permit 177982-019-SC/T3 and Operation 177982-020-SO/T3 respectively. Similarly, this permit application is a modification of Construction Permit 177982-019-SC/T3 and 177982-020-SO/T3 respectively. Please revise the narrative in this section accordingly. Please also revise the permit modification application cover page.

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

3. **Part A.12.:** The September 12, 2017 draft application form provided current census and five-year projection from 2016. Please verify and revise this section accordingly.

4. **Part B.3.:** As indicated in the September 12, 2017 draft application form, with the addition of Cell 17, the disposal acreage is proposed to be 81.4 acres. Please verify and revised this part accordingly.

5. **Part B.21.:** With the construction of Cell 17, leachate will no longer gravity drain to the temporary stormwater pond in Cell 14. Please verify and revise this part accordingly.

6. **Part B.24:** With the construction of Cell 17, all the leachate will be disposed into a percolation pond [IW Pond 3]. Please verify and revise this part as appropriate.

7. **Part C.:** The September 2017 draft application form indicated that, the prohibitions were discussed in Section 3 [Engineering Report] of the permit application. Please verify and revise this part accordingly.

8. **Part D.2.:** The September 2017 draft application form indicated that engineering certification is included in Sections 1,2, & 4 of the permit application. Please verify and revise this part accordingly.

9. **Part D.13. and Appendix D-2:** Please publish the Notice of Application provided in Appendix D-2 and provide proof of publication to the Department.

10. **Part E.2.:** Rule 62-701.330(3)(c), F.A.C. requires the submittal of a topographic survey that shows the topography of “the proposed fill area, any borrow area, access roads, grades required for proper drainage and disposal lifts...”. The 2013 survey is not reflective of these site conditions in 2018, either in proposed Cell 17 or in existing disposal areas where vertical expansion is proposed. Therefore, the referenced 2013 survey does not meet the requirements of Rule 62-701.330(3)(c), F.A.C. Please provide a current topographic survey of the site.

11. **Part I.1.g.:** This part references Attachment 1 (i.e. the entire permit application) as the location for the geotechnical report. Please verify and provide the specific location in the application where the geotechnical report is provided.

12. **Part J.:** The location references provided in the September 2017 draft application form have been removed and the entire Part marked “N/A”. Please verify and revise this Part as appropriate to include the location references.

13. **Parts L.1.c.(8) and L.1.e.(1).:** These parts are marked “N/C”. However, it appears that the monitoring plan provided in Section 5 proposes both the abandonment of existing monitoring wells and the initial background sampling of new monitor wells associated with Cell 17 construction. Please verify and revise these parts as appropriate.

SECTION 2 – CHECKLIST SUPPORT, [Rule 62-701.320 (7), F.A.C.]:

14. **Part C - Prohibitions (2012):** This referenced prior submittal is outdated in that it refers to references not provided with this application, refers to outdated Attachment C-1, and assumes permit renewal without lateral expansion. Please provide an updated Part C.

15. **Part D - Solid Waste Management Facility Permit Requirements, General (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application. Please provide an updated Part D.

16. **Part E - Landfill Permit Requirements (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application. Please provide an updated Part E.

17. **Part E-1 – Groundwater Monitoring Lab Certification (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application. Please provide an updated Part E-1.

18. **Part E-2 – Topographic Survey (2012):** This referenced prior submittal is not applicable to this application in that includes an even older topographic survey (8/12/12) than discussed in Response #3 of the cover letter. Please provide a revised Part E-2 to address Comment #10 above.

19. **Part F – General Criteria for Landfills (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application and refers to information that has been replaced as part of this application. Please provide an updated Part F.

20. **Part G – Landfill Construction Requirements (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application, refers to references not submitted as part of this application, refers to information that has been replaced as part of this application and does not refer to Appendix G-1 submitted with this application. Please provide an updated Part G.
21. **Part H – Hydrogeological Investigation Requirements (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application, refers to attachment not submitted or referenced in this application, and refers to information that has been replaced as part of subsequent applications. Please provide an updated Part H.
22. **Part I – Geotechnical Investigation Requirements (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application and refers to information that has been replaced as part of this application. Please provide an updated Part I.
23. **Part K – Landfill Operation Requirements (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application and does not refer to information provided in subsequent permit applications, including this application. Please provide an updated Part K.
24. **Part L – Water Quality and Leachate Monitoring Requirements (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the Water Quality Monitoring Plan submitted as part of the 2012 permit renewal application and does not refer to information provided in subsequent permit applications, including this application. Please provide an updated Part L.
25. **Part N – Gas Management System Requirements (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the 2012 permit renewal application gas management system which has been subsequently modified as part of subsequent permit applications, including this application. Please provide an updated Part N.
26. **Parts O through R (2012):** This referenced prior submittal is not applicable to this application in that the information provided specifically refers to the Closure and Reclamation Plan provided as part of the 2012 permit renewal application which has been replaced as part of a subsequent permit application and modified in this application. Please provide updated Parts O through R.
27. **Parts D-1 & M (2012):** While the information provided in these parts may still be valid, since the remaining entirety of Section 2 will need to be replaced as part of this permit application, please also submit these sections with revised Section 2.

APPENDIX G-1 – LINER SYSTEM REQUIREMENTS EVALUATION (Rule 62-701.340(2)(b), F.A.C.)

28. **§6.0:** Response 11 in the cover letter discusses information “added to hydrogeological evaluation”, however an updated hydrogeological evaluation was not provided. Please provide the updated evaluation [e.g. Section 6.0 consistent with the Cell 16 evaluation].

29. **§7.0:**

a. This section concludes the SPT borings collectively characterize the subsurface conditions of Cell 17. However, Section 3.3.2 of the August 30, 2017 draft Universal Engineering Services [UES] Report both discussed the variability in subsurface conditions identified in the boring logs results and states that the boring logs and related information “are indicators of subsurface conditions only at the specific locations and times noted” and “Subsurface conditions, including groundwater levels and the presence of deleterious materials, at other locations on the site may differ significantly from conditions which exist at the sampling locations.”

Response 12.a. in the cover letter indicates that the qualifying statements in Section 3.3.2 of the August 30, 2017 report were standard language in all geotechnical reports prepared by UES and consistent with standard industry practices. However, the evaluation Cell 16 subsurface conditions provided in Section 2.3 of UES’s May 31, 2016 report included no such qualifying statements regarding its conclusions regarding Cell 16 subsurface conditions. This difference in the conclusions provided appeared to reaffirm that UES came to different conclusions as to whether the subsurface of Cells 16 and 17 respectively could be characterized.

The February 2, 2018 UES report modifies Section 3.3.2 of the report to indicate that information characterization of subsurface conditions based on the borings logs is entirely based on the information provided by Locklear & Associates [L&A] and to remove any statement that where UES characterizes the data. The section is also revised to provide a change in conclusion regarding sitewide characterization of the site without an explanation of how that revised conclusion was obtained.

These conclusions appear to indicate that L&A is basing its conclusion regarding geotechnical evaluation of the site on UES reports and the February 2, 2018 UES report qualifies its conclusions by indicating that it is utilizing but is not verifying the validity of the information provided by L&A. Therefore, it appears that neither L&A or UES has both verified and characterized the subsurface conditions of the Cell 17 and investigative data upon which their conclusions are based.

Please verify and revise this section, Appendix G-1, and/or the UES report as appropriate to address these comments. This comment should be discussed in further detail during the meeting requested at the end of this letter.

b. The revised conclusion in Section 3.5 of the February 2, 2018 UES report that the potential for sinkhole occurrence in Cell 17 is “average for the area which was initially assessed as low” is non-responsive in that there was no previous “initial assessment” of sinkhole potential for Cell 17. UES’s May 31, 2016 geotechnical report concluded that the sinkhole risk in the proposed Cell 16 footprint was “low” and the February 2, 2018 UES report does not come to the same conclusion for Cell 17. As previously noted by the Department, this apparent greater potential for sinkhole in Cell 17 than Cell 16 does not appear to be discussed or considered in the liner evaluation report.

30. **Attachment – Groundwater Quality Graphs:** Please revise report text (i.e. Section 6.0) to comment on the attachments and how they are applicable to the Liner System Requirement Study Report.

Attachment 1 – Universal Engineering Report:

31. **§1.2:** As stated in this section, based your response comments related to the geotechnical information provided to Universal, a revised Universal report will be needed.

32. **§3.3.2 & §3.4:** As previously noted by the Department, an understanding of the shallow water table elevations would appear to be important information in characterizing subsurface condition and conducting a sinkhole evaluation and geotechnical investigation of Cell 17. Response #15 in the cover letter indicates that a shallow aquifer was not encountered during advancement of the borings. It is therefore unclear how a seasonal high groundwater table elevation of 72 ft. NGVD can be assumed throughout this application when that water table was not encountered in advancement of any of borings throughout the site. Please explain.

33. **§3.5:**

a. Response 16a. in the cover letter indicated that there were no losses of drilling fluid circulation (LOC) observed in SPT borings. However, boring log for B-131 indicated a partial LOC at 38 feet. Additionally, six (6) of the ten (10) SPT borings completed in March 2000 by UES reported losses of drilling fluid circulation. Please explain and provide the missing field logs for B-131, B-132, and B-133.

b. The UES report letter does not explicitly address the potentially weakened boring profile from B-101. The UES report indicated that the only boring with weathered limestone in the upper limestone zone was boring B-103 with N-values of 6 and 8, followed by values of 41 and 50/2-inches. However, those N-values were not presented on the boring log for B-103. Additionally, boring B-131 encountered a significant interval of weathered limestone in the upper limestone zone. Boring B-131 also recorded decreasing penetration resistances with increasing depth from 13.5 feet to 33.5 feet in the clayey soils overlying the weathered limestone and a partial LOC also occurred within this boring. Please explain.

34. **§4.0:** Response #17 in the cover letter indicates UES and Civil Design Services, Inc. [CDS] communicated during the preparation of their reports. This section no longer states that Universal Engineering's recommendation are unchanged from those presented in their May 5, 2000 geotechnical report. However, there still does not appear to be any indication in the UES February 2, 2018 report that the CDS's report for Cell 17 and the proposed vertical expansion were provided to or considered by UES or that UES conclusions for existing areas where vertical expansion is proposed were re-evaluated. The previous UES evaluations for the existing area proposed for vertical expansion therefore appear outdated and shall be re-evaluated. Please verify and provide a revised evaluation accordingly.

Attachment 1: Appendix C – Locklear & Associates Boring Logs & Information:

35. **Figure 1 – Proposed Borings:** This figure appears to have been removed from the report. Please explain and provide the figure, revised to include additional borings conducted, as appropriate.

36. **Boring Field Logs:** Response #18 in the cover letter does not explain why different field boring logs for boring B-102 were prepared and why one was chosen over the other by UES in their evaluation. Instead the field borings logs were removed from the report. Please address this comment and explain why the data was removed from the report.

37. Boring Log Cross-Sections:

a. If borings SSA-36, and B-23 are utilized in the evaluation, then the boring logs for these should be provided in the report. Response #19.a. in the cover letter, which indicates that the boring profiles for SSA-36 and B-23 were provided as part of the Cell 16 application appears indicative that not all the relevant supporting geotechnical information was provided to UES. Please verify and provide this information in the report as previously requested, as appropriate.

b. There were no elevations provided in either the Universal borings logs or the Locklear field logs. Response #19.b. in the cover letter indicates that the UES boring logs and L&A field logs were revised to include the elevations. However, it appears that the UES borings logs were removed from the report. This again appear to be an indication that UES is not associating itself with the validity of the boring log data provided to them. Please explain why the UES boring logs were removed from their report.

38. Universal Engineering Sciences Geotechnical Exploration Report – May 5, 2000: Since reference to the May 5, 2000 UES report was removed from Section 4.0, it is unclear why the May 2000 report is still included in Appendix C of the report. Please verify and explain and revise the report, as appropriate.

PART I - GEOTECHNICAL INVESTIGATION REQUIREMENTS – APPENDIX I-2 (Rule 62-701.410, F.A.C.)

Civil Design Services, Inc. - Slope Stability, Settlement, and Bearing Capacity Analysis Report:

39. In the event that additional subsurface investigation is conducted, the slope stability, settlement, and bearing capacity analyses should be modified accordingly to consider new information.

40. It appears that the first page of the CDS report still indicates that the report is limited to evaluation of the proposed Cell 17 expansion. Please verify and revise to indicate what evaluations of sitewide slope stability, settlement, and bearing capacity analyses in support of the proposed vertical expansion are included in the report. A review of the CDS report appears to indicate that while a slope stability and bearing capacity analyses were conducted in support of the proposed vertical expansion, the settlement analyses were still limited to Cell 17. Please verify and explain why these were not conducted and/or provide these analyses.

41. Reference Documents:

a. Reference No. 5.: Please verify that the report referenced is a February of 2018 report.

b. This section states “Refer to Attachment A for borings logs used for slope stability and modeling”. However, Attachment A of this report contains only a header page with no information. Please verify and revise, as applicable.

42. Slope Stability Model Analysis:

a. The permit modification plans provided by L&A are based on an outdated topographic survey of the site. Please revise the slope stability modeling, if appropriate, based on updated plans prepared with a current topographic survey of the site.

- b. Since water table readings were not obtained in conducting the borings, how can a seasonal high groundwater table be assumed in the analysis. Where was this assumed water table elevation obtained? Response #22 in the cover letter states that the CDS report was revised to include the above requested information. However, the discussion of the seasonal high groundwater table in the CDS report is unchanged. Please address this comment and revise the report, as appropriate.
- c. Utilizing borings with similar soil types and SPT N-values without considering outlier boring results does not appear to provide an accurate analysis of the slope stability of the Cell 17 as a whole. Response #22 in the cover letter states that the CDS report was revised to include the above requested information. However, the discussion of the grouping similar soil types together for the purposes of modeling in the CDS report is unchanged. Please address this comment and revise the report, as appropriate.
- d. What is identified as a North/South (West) Section appears to be more a center section of Cell 17. Since the subsurface of the western portion of Cell 17 is clearly different, a north-south cross-section analysis in that area appears to be warranted. Response #22 in the cover letter states that the CDS report was revised to include the above requested information. However, a north-south cross section analysis in the area described above was not provided in the CDS report and a discussion of the comment above not included in the report. Please address this comment and revise the report, as appropriate.
- e. Figure 1 – Cell 1 through 17 Expansion and Cross-Section: Figure 1 does not appear to have been included in the report. Please verify and revise the report, as appropriate.
- f. Figure 2 – Cell 17 North/South Model (Eastside of Cell 17) Cross Section: Although labeled as a cross section on the eastside of Cell 17, the Figure 2 cross section appears to be through borings located in center of Cell 17. Please verify and revise Figure 2 as appropriate.
- g. Figure 3 – Cell 17 North/South Model (Westside of Cell 17) Cross Section: Although labeled as a cross section on the westside of Cell 17, the Figure 3 cross section appears to be through borings located on the eastside of Cell 17. Please verify and revise Figure 3 as appropriate.
- h. Figure 4 – Cell 17 West to East Cross Section: The subsurface in borings B-101 and B-105 appears different than that in borings B-104 and B-107. Please explain why the west-east cross through borings B-104 and B-107 is most appropriate for use in the west to east slope stability analysis for Cell 17.
- i. Figure 5 – Cell 1 Cross Section: Although labeled as a south to north cross section of Cell 1, the Figure 5 cross section appears to be through borings located east to west through in Cell 1. Please verify and revise Figure 5 as appropriate.
- j. Figure 7 – Cell 7 Cross Section: Although Boring B-15 is shown on the cross-section at the boundary of Cell 6 and Cell 4, it appears to be located at the boundary of Cell 6 and Cell 5. Please verify and revise Figure 7 if appropriate.
- k. Slope Stability Analysis: Based on the comments provided in Comments #41.f. and #41.g. above, please verify the descriptions for Attachments D and E and revise, as appropriate. Please also verify the descriptions in Table 1. Summary of Slope Stability Models.
- l. Bearing Capacity Estimation: Based on the comments provided in Comments #41.f. and #41.g. above, please verify the descriptions for analyses provided in Attachment J and revise, as appropriate.

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

43. **§3.1:** The referenced September 2017 plan set was a draft plan set and should not be referenced in the report. Please revise this section and the plan set to reflect a February 2018 date. There also appear to multiple references to the “2017 Plan Set” and the “September 2017 permit modification application” throughout the Engineering Report and Operation Plan that need to be modified. Please verify and revise as appropriate.
44. **§3.4:** Please revise this section to reference the current topographic survey provided in response to Comment #3 above.
45. **§3.7:** Phasing of cell construction and filling operation is also shown on Sheet 2.00 of the plan set. Response #28 in the cover letter acknowledged this comment, however the narrative in Section 3.7 was unchanged. Please verify and revise this section as appropriate.
46. **§3.8:**
- a. Phasing Sequence 1:
- 1) It is unclear when filling in Cells 1-7 and 15 to fill 4H:1V slopes from 122’ to 167’ NGVD will occur. This previously provided comment does not appear to be addressed. Please explain and revise this section accordingly.
- b. Phasing Sequence 3:
- 1) Reference to Elevation 217’ appear to be a previously identified typo that was not corrected. Please verify and revise this section accordingly.
- 2) The construction of the bench at elevation 137’ NGVD is also described in Phasing Sequence 1. This previously provided comment does not appear to be addressed. Please verify and explain and revise Section 3.8, accordingly.
47. **§3.8.2:**
- a. Department comments on the September 2017 draft application indicated the need to discuss erosion control on exterior 3H:1V slopes. Response #30 in the cover letter indicates that the engineering report has been revised to discuss erosion control. However, Section 3.8.2 of the report remains unchanged. Please address this comment and revise Section 3.8.2. as appropriate.
- b. Department comments on the September 2017 draft application indicated the need to provide revised erosion calculations based on relocation of benches and increased slope of exterior slopes. Response #30 in the cover letter indicates that the engineering report has been revised to discuss erosion control. However, the requested revised erosion calculations based on relocation of benches and increased slope of exterior slopes were not provided. Please address this comment and provide the requested erosion calculations accordingly.
48. **§3.8.3:** Please provide revised life expectancy calculations based on the current topographic survey provided in response to Comment #3 above.
49. **§3.10.1: Design of Gas, Leachate and Stormwater Controls:**
- a. Gas Probe Design: The proposed 1-foot difference in elevation between the surface elevation and the top of perforated section elevation in gas probes GP-6R and GP-7R does not appear adequate to prevent surface air infiltration. Please verify and revise the proposed design, as appropriate.

b. **Passive Gas Vents:** Comment #32.b. in the cover letter indicated that Figure 3-16 from 2012 was revised. However, this section still references Figure 3-16 from 2012 and a revised Figure 3-16 does not appear to have been provided with this application. Please verify and revise this section and Figure 3-16 as appropriate.

APPENDIX 3A - Operations Plan (Rule 62-701.500(9), F.A.C.):

50. **§8.1: Cell Sequence:** Please modify consistent with changes in Engineering Report.

51. **Attachment 1 – Facility Entrance Sign:** Response #37 in the cover letter indicates that the facility entrance sign will be updated, and photographs will be submitted under separate cover. The Department does not appear to have received this information. Please revise Attachment 1 to include this information.

52. **Attachment 7 – SOPF Registration:** Response #39 in the cover letter indicates that the facility's most current SOPF registration will be submitted under separate cover. The Department does not appear to have received this information in support of this permit application. Please revise Attachment 7 to include this information.

APPENDIX 3B - Contingency Plan (Rules 62-701.320(7)(e)2. & (16), F.A.C.):

53. **Emergency and Contingency Operations:**

a. **Landfill Shutdown:** Please revise this section to discuss leachate management prior to landfill shutdown (e.g. will the leachate manhole be pumped out prior to shutdown; what provisions for continue pumping of leachate will be in place, etc.). The statement that "an on-site portable generator will be relocated to the leachate management lift station" does not described how continue leachate management operation will take place during a shutdown.

SECTION 4 – 2018 PLAN SET (Rule 62-701.320(7)(f), F.A.C.)

54. Please revise Plan Set to include most current topographic survey. This includes modification to topographic background and existing grades on all applicable drawings See Comment #3 above.

55. **Drawings C0.04:** Please provide a section detail drawing of the STM-2 cleanout.

56. **Drawings C1.10 & C1.11:** It is unclear why the Section B-B' was located at the boundary of Cells 16 & 17 with Cells 15, 5, 6B, & 7. It would appear to be more appropriate to locate Section B-B' in the center of Cells 16 & 17, consistent with Section B-B' depicted on Drawings C1.00 & C1.01. Please relocate the location of Section B-B' on Drawings C1.10 & C1.11 or provide supporting justification for it currently chosen location.

57. **Drawing C2.00:** Based on the elevations presented on several drawings in the plan set for the Cell 7 & Cell 17 west conveyance swales and Pond 3, it is unclear how leachate will drain to Pond 3 once construction of Cell 17 begins and throughout the remaining operation period of facility. This comment should be discussed in further detail during the meeting requested at the end of this letter.

58. **Drawing C4.10:**

a. **Wall Sleeve and Connection Detail:** This detail describes a 6" SDR 17 wall sleeve while the Leachate Collection Wetwell Section describes an "8" SDR 17 HDPE Wall Pipe". Please verify and revise these drawings, as appropriate.

b. 6" Perforated SDR 17 Pipe Detail: Drawing C0.04 and others describe an 8" SDR 17 HDPE perforated pipe utilized in Cell 16 and proposed for Cell 17. Please verify and revise this detail, as appropriate.

c. Leachate Collection Wetwell Section: This section describes a 6" SDR 17 HDPE Influent Pipe. It is the Department understanding that during Cell 16 construction the pipe size for the leachate conveyance system was changed from 6" to 8" pipe. Please verify and revise this drawing, as appropriate.

SECTION 5 – GROUNDWATER MONITORING PLAN (Rule 62-701.510, F.A.C.)

59. **§1.a.:** Per Rule 62-701.210(21)(l), please revise to cite ASTM standard ASTM D5092-04(2010)e1.

60. **§1.b.:** Please revise the sub-section titled "Sign and Seal" to cite Chapter 492, Florida Statutes.

61. **§1.d.:** The sub-section titled "Groundwater Monitoring Requirements" indicates the detection wells are located no more than 500 feet apart. However, groundwater flow generally exhibits a west to northwesterly flow. A pair of detection monitoring wells (surficial aquifer/Floridan aquifer) should be installed along the western side of Cell 17, no more than 500 feet from proposed detection monitoring wells MW-21A/MW-21B. Please update relevant sections of the Groundwater Monitoring Plan with new proposed detection wells. Please also revise all part of this application, where applicable, to discuss and include these new proposed wells.

62. **Table 1:** Please update Table 1 to include new proposed detection wells as discussed in Comment #60. above.

63. **Figure 1:**

a. Please update Figure 1 to include new proposed detection wells as discussed in Comment #60. above.

b. Please include locations and labels for existing monitoring wells MW-5A and MW-5B.

64. **Figure 2:**

a. Measurements provided in column D appear to be the incorrect units of measure. Please review and revise.

b. b. The graphic shows the top of the concrete pad completed above existing grade; the interface between measurements D and B is shown to be the top of the concrete pad. Please clarify and revise if the interface between measurements D and B is supposed to be at existing grade and/or if top of concrete pad is actually supposed to be completed at existing grade, as applicable.

c. The graphic shows the interface between measurements B and C to be some distance above the top of the well screen. Please clarify and revise if the interface between measurements B and C is supposed to be at the top of the well screen, as applicable.

65. **Figure 3:**

a. Measurements provided in column D appear to be the incorrect units of measure.

- b. The graphic shows the top of the concrete pad completed above existing grade; the interface between measurements D and B is shown to be the top of the concrete pad. Please clarify and revise if the interface between measurements D and B is supposed to be at existing grade and/or if top of concrete pad is actually supposed to be completed at existing grade, as applicable.
- c. The graphic shows the interface between measurements B and C to be some distance above the top of the well screen. Please clarify and revise if the interface between measurements B and C is supposed to be at the top of the well screen, as applicable.
66. **§1.e. “Surface Water Monitoring Requirements”:** 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).
67. **§1.g. “Sampling Frequency and Requirements”:** Please revise subsection (1), per Appendix 3, Para. 4.b., and Para. 5.c. of Permit #177982-020-SO/T3, the initial sampling of the new wells should be conducted within 7 days of installation and development.
68. **§1.h. “Evaluation Monitoring, Prevention Measures, and Corrective Action”:**
- a. Please revise, per Rule 62-701.510(6)(a)2., to indicate the permittee shall sample and analyze a representative sample of the background wells and all affected detection wells for the parameters listed in paragraph (7)(c) of this section within 90 days of notification from the Department to initiate evaluation monitoring and annually thereafter.
- b. Please revise, per Rule 62-701.510(6)(a)3., to indicate the compliance monitoring wells shall be installed and sampled at the compliance line of the zone of discharge and downgradient of the affected detection within 90 days of notification from the Department to initiate evaluation monitoring.
- c. Please revise, per Rule 62-701.510(6)(a)4., that a contamination evaluation plan should be submitted to the Department within 180 days of notification from the Department to initiate evaluation monitoring.
- d. Please revise, per Rule 62-701.510(6)(a)5., that if the contamination evaluation report indicates that water quality standards or criteria are likely to be violated outside the zone of discharge, a prevention measures plan shall be submitted to the Department within 90 days.

APPENDIX 7A – FINANCIAL ASSURANCE COST ESTIMATES (Rule 62-701.630, F.A.C.)

69. The Department’s October 16, 2017 comments memo indicated that the applicant could utilize the previously provided January 2017 inflation-adjusted unit costs. However, the permittee has subsequently submitted an annual update to the January 2017 costs on February 7, 2018, which were approved on February 7, 2018. Therefore, the unit costs need to be inflation adjusted to match the current approved cost estimate for the facility. Please revise the estimates accordingly.
70. No supporting information for the revised unit quantities was provided. Please provide an update of the document titled “Financial Assurance Closure and Long-Term Care Cost Estimates General Information and Assumptions” that supports the information provided on the revised Form 62-701.900(28) F.A.C. The revised cost estimate will be review in their entirety upon receipt of this information.