

Tift, Rachel

From: Tift, Rachel
Sent: Wednesday, June 6, 2018 11:19 AM
To: john.phillip.arnold@gmail.com
Cc: ljbaker23@outlook.com; Morgan, Steve; Madden, Melissa; Chamberlain, Justin; Tift, Rachel; Felix, Diana; Tafuni, Steven; Black, Alexis
Subject: First Request for Additional Information for Enterprise Road Class III Recycling & Disposal Facility (Project Nos. 177982-027-SC/T3 & 177982-028-SO/T3)
Attachments: 177982-027-SC & 177982-028-SO RAI #1.pdf

Mr. Arnold:

Please find attached a request for additional information in regards to the above referenced permit applications for Enterprise Road Class III Recycling & Disposal Facility.

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

Thanks & Best Regards,

Best Regards,
Rachel Tift



Rachel Tift
Engineering Specialist II
Florida Department of Environmental Protection
Southwest District
13051 N. Telecom Parkway, Suite 101
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 continue to identify ongoing improvements to our permitting process by standardizing and simplifying our documents.



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

June 6, 2018

Angelo's Aggregate Materials, LTD
855 28th Street South
St. Petersburg, FL 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
Facility ID: 87895
DEP Application Nos.: 177982-027-SC/T3 & 177982-028-SO/T3

Dear Mr. Arnold:

Thank you for your renewal applications for construction and operation of the above referenced Facility. The Department has assigned DEP Application Nos. 177982-027-SC/T3 & 177982-028-SO/T3 to the application. A Department staff review of the applications and supporting documentation submitted on May 8, 2018, indicates the applications are 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 requests a response within 60 days of the date of this letter, August 5, 2018. 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, unless a written request for additional time to provide the requested information is submitted and approved. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to SWD_Waste@dep.state.fl.us, with a copy to rachel.tift@floridadep.gov. 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/>. After posting the document, send an e-mail to SWD_Waste@dep.state.fl.us, with a copy to rachel.tift@floridadep.gov, alerting us that it has been posted.


Angelo's Aggregate Materials, LTD

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June 6, 2018

In order to ensure the next submittal will be as complete as possible, the Department requests that a meeting be scheduled prior to submitting a response in order to discuss the draft submittal. Please contact Rachel Tift to schedule a meeting time and date. If you have any questions, please contact Rachel Tift by telephone at 813-470-5755 or by e-mail at rachel.tift@floridadep.gov.

Sincerely,



Steven G. Morgan
Air & Solid Waste Permitting Manager
Permitting and Waste Cleanup Program
Southwest District

cc: Lisa Baker, P.E., Locklear & Associates, Inc., lisa@locklearconsulting.com
Steve Morgan, DEP Southwest District, steve.morgan@floridadep.gov
Melissa Madden, DEP Southwest District, melissa.madden@floridadep.gov
Justin Chamberlain, DEP Southwest District, justin.chamerlain@floridadep.gov
Rachel Tift, DEP Southwest District, rachel.tift@floridadep.gov
Diana Felix, DEP Southwest District, diana.felix@floridadep.gov
Steven Tafuni, DEP Southwest District, steven.tafuni@floridadep.gov
Alexis Black, DEP Southwest District, alexis.black@floridadep.gov

Attached: List of Requested Information

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Angelo's Aggregate Materials, LTD
Facility Name: Enterprise Road Class III Recycling and Disposal Facility
Facility ID: 87895
DEP Application No.: 177982-027-SC/T3 & 177982-028-SO/T3

Application to Construct, Operate, Modify, or Close a Solid Waste Management Facility (DEP Form # 62-701.900(1), F.A.C.), dated May 7, 2018, received May 8, 2018

Application Cover Letter & Cover Page

1. The facility WACS No. is incorrectly listed as SWD/29/41084 in the cover letter and the application cover page. Please correct the WACS No. to SWD/51/87895.

Section 1 - Permit Application [Subsection 62-701.330(3), F.A.C.]

2. **Part A.12.:** Please revise the current and five-year projection populations based on the most current available data.

Section 2 - Checklist Support [Subsections 62-701.320(5) & 62-701.330(3), F.A.C.]

3. The Table of Contents for this application includes a note stating that certain supporting information was provided in past submittals which are already on file with the Department and are unchanged (i.e., still valid). However, the 2012 Permit Renewal Application submitted by Kelner Engineering, Inc. refers to information that has been replaced as part of this application and, in some cases, does not fully address the requirements of each checklist item (i.e. not valid). The Department has determined that the supporting information from the previously submitted Kelner 2012 Permit Renewal Application does not meet the requirements of Paragraph 62-701.320(10)(c), F.A.C. and may not be simply referenced. Therefore, Part C, Parts E – G, and Parts K – R will need to be re-evaluated, revised (and/or replaced), and submitted as a part of this application package. Please revise the Checklist in Section 1 as appropriate.
4. **Part D:** The Table of Contents appears to indicate that Part D was updated for this application but was not submitted. Please provide Part D.
5. **Part D-2:** This section includes the text for the Notice of Application and indicates it will be published. Please publish the Notice of Application and provide proof of publication.
6. **Part E-2 [Paragraph 62-701.330(3)(c), F.A.C.]:** This section indicates that the topographic survey will be provided to the Department under separate cover, however an update survey has not been provided to date. Please provide the topographic survey, and revise all references to the 2013 topographic survey throughout the application.
7. **Parts H-J:** For these parts, the Table of Contents similarly refers to supporting information previously provided in the Locklear & Associates, Inc. 2016 Permit Modification Application which is already on file with the Department. However, for Parts H-J, the Locklear 2016 application also refers to Parts H-J of the outdated and no longer valid Kelner 2012 Permit Renewal Application. Please provide updated Part H through J and revise the Checklist in Section 1 as appropriate.

Section 3 - Engineering Report [Paragraphs 62-701.320(7)(d) & 62-701.330(3)(d), F.A.C.]

8. The Table of Contents for the Engineering Report incorrectly lists Appendix 3-C as “Kelner 2013 Permit Renewal Application Figures.” Appendix 3-C was updated and provided as part of this application (“Figures”). Please revise the Table of Contents to reflect the information provided.
9. Based on indicated future site plans and for consistency with ongoing permitting, all references to Cells 13 and 14 should be amended to Cell 17. Please revise these references throughout the application, including in the Engineering Report, Operation Plan, and applicable drawings and figures.
10. **3.1 General:** This section describes a permit modification application submitted in 2016 and lists the components of that submittal. Please revise this section to describe this renewal application and its components since this permit replaces previous permits.
11. **3.3 Surrounding Land Uses and Zoning:** Please revise this description to include the use of the parcel to the northwest of the facility (Owner: Angelos Aggregate Materials, LTC, Parcel No. 05-25-22-0000-00500-0000). A review of aerial photographs appears to indicate use of the property by the landfill. Please clarify whether this parcel is part of the landfill operations. If so, please revise Section 3.2 and all applicable attachments and drawings to include this parcel.
 - a. Figure 3-2a in Appendix 3-C is not an aerial photograph map as referenced in this section. Please revise the figure description.
 - b. Figure 3-2b in Appendix 3-C is the future land use map, not Figure 3-2A as referenced in this section. Please revise the figure reference.
 - c. Figure S-1 of Appendix 3-C is the well survey, not Figure 5 (which was not provided) as referenced in this section. Please revise the figure reference.
12. **3.4 Topography:** Figure 3-3 is the topographic map, not Figure 3-1 as referenced in this section. Please revise the figure reference.
13. **3.4.1 100-Year Flood Prone Areas:** An updated Figure S-5 is provided in Appendix 3-C as part of this application. Please revise the figure description so that it no longer references the 2013 permit renewal application.
14. **3.5 Soils:** An updated Figure 3-5 is provided in Appendix 3-C as part of this application. Please revise the figure description so that it no longer references the 2013 permit renewal application.
15. **3.7 Excavation Operation and Cell Construction and 3.10.2 Leachate Control:** These sections discuss design and operation of the toe drain and leachate manhole. It does not appear that these descriptions are consistent with the February 2017 revisions to the Engineering Report which included the addition of a pump and float control system and revised procedures of how leachate would be conveyed to the pond. Please revise these sections to include the originally permitted design and operation details for the leachate control system.
16. **3.8 Method of Cell Sequence:**
 - a. Please revise this section to reflect current site conditions (e.g., Cell 7 construction is complete).
 - b. The temporary stormwater pond, in addition to Pond 3, will receive runoff after development of Pond 3 until proposed Cell 17 is permitted and constructed. Please revise this section to clarify the stormwater management.

17. **3.8.3 Life Expectancy:** Please revise this section based on the updated topographic survey (See Comment #6 above).
18. **3.10.1.3 Methane Gas Measurement:** The Operations Plan is provided in Appendix 3-A. Please revise the appendix reference.
19. **3.10.1.5 Passive Gas Vents:** This section refers to Figure 3-16 provided in Appendix 3-C of the 2012 permit renewal application submitted by Kelner Engineering. Appendix 3-C has been updated and replaced as part of this application, however Figure 3-16 is not provided. Please update Appendix 3-C to include this figure.
20. **3.10.2 Leachate Control:** Please revise this section based on the completion of Cell 7 construction.
21. **3.10.3 Stormwater Controls:** Please revise this section based on the Industrial Wastewater permit issuance for Pond 3.

Section 3 - Appendix 3-A Operations Plan [Paragraph 62-701.330(3)(i), F.A.C. & Subsection 62-701.500(2), F.A.C.]

22. Throughout the Operations Plan, where references are made to appendices of the Engineering Report and/or this application please revise the narrative to clarify that these are references to other parts of the application rather than appendices of the Operations Plan.
23. **4.0 Contingency Operations:** The Contingency Plan is provided in Appendix 3-B of the Engineering Report. Please revise the appendix reference.
24. **5.3 Contingency for Unacceptable Materials:** This section references City Environmental for disposal of special wastes. Please verify that this facility has not changed its name and is still in operation and revise this section as appropriate.
25. **5.4 Acceptable and Unacceptable Class III Landfill Waste Material:** The description of processed waste tires in this section includes language from Paragraph 62-711.400(3)(b), F.A.C., which refers to “subsection (a) above.” For clarity, since there is no subsection (a) used in the description contained in the Operation Plan, please revise to “above.”
26. **8.1 Cell Sequence:**
 - a. Please revise this section to reflect current site conditions (e.g., Cell 7 construction is complete).
 - b. The temporary stormwater pond, in addition to Pond 3, will receive runoff after development of Pond 3 until proposed Cell 17 is permitted and constructed. Please revise this section to clarify the stormwater management.
27. **10.1 Gas Monitoring and Control:** This section refers to Figure 3-14 provided in Appendix 3-C of the 2012 permit renewal application submitted by Kelner Engineering as depicting the construction details of the passive gas vents and a typical gas probe. This figure only depicts Gas Probe Construction Detail, not Proposed Passive Gas Vents, which is depicted in Figure 3-16. In addition, Appendix 3-C has been updated and replaced as part of this application, but Figures 3-14 and 3-16 are not provided. Please update Appendix 3-C to include these figures and revise the figure reference for the passive gas vents.

28. 10.2 Leachate Control:

- a. Please revise this section based on the completion of Cell 7 construction.
- b. Please revise the description regarding method and frequency of leachate pumping from the manhole based on responses to Comment #15 above.
- c. Leachate pumping will not be vacated after final closure but will continue until leachate is not generated in volumes to be collected in the sump. Please revise this section accordingly.

29. **10.3 Stormwater Control:** Please revise this section based on the Industrial Wastewater permit issuance for Pond 3.

30. **19.0 Records, Permits and Reports:** Please revise this section to include the annual topographic survey as described in Section 5.6.

31. **Attachment 1:** In correspondence from Locklear & Associates dated and received February 9, 2018, it was stated that the facility entrance sign would be updated and that photographs would be submitted under separate cover. Please provide photos of the updated sign.

32. **Attachment 7:** The registration provided is expired. Please provide a copy of the current registration.

Section 3 - Appendix 3-C Figures [Rule 62-701.300, F.A.C. and Subsection 62-701.330(3), F.A.C.]

33. **Figure 3-2a:** The Existing Land Use Map appears have been last updated in 2011. Please verify that this map is still current and revise if necessary.

34. **Figure S-3:** Figure S-3 is listed as support in Section 3.2.1 of the Engineering Report to show that the disposal of solid waste is not within 3,000 ft. of Class I surface waters. Figure S-3 depicts a 300 ft. buffer. Please revise the figure to support compliance with the prohibition.

Section 3 - Appendix 3-D Well Abandonment Documentation

35. Appendix 3-D is not referenced in the application checklist, Engineering Report or Operation Plan. Please evaluate the need to include this appendix.

Section 4 - 2016 Plan Set [Paragraphs 62-701.320(7)(f) & 62-701.330(3)(b), F.A.C.]

36. Please update the Plan Set based on construction of Cell 7, replacement and abandonment of various gas probes, re-designation of Cells 13/14 to Cell 17 and the updated topographic survey.

37. Please revise all references throughout the application to the 2016 Plan Set and Section 4 of the March 2016 permit modification application (and the associated RAI responses), and ensure that all drawing number references throughout the application are still valid.

Section 5 - Groundwater Monitoring Plan [Rule 62-701.510, F.A.C.]

38. **1.e. Surface Water Monitoring Requirements:** Please revise wording for surface water monitoring triggered by an unexpected event of a surface water discharge to remove the citation of the previous permit.

39. **1.g.(1) Sampling Frequency and Requirements:** Please revise to indicate that new monitor well shall be sampled within 7 days of well completion and development for the parameters listed in paragraphs 62-701.510(7)(a) and (c), F.A.C.
40. **1.g.(2) Sampling Frequency and Requirements:** Please revise to indicate groundwater samples from all monitoring wells (background, detection and compliance) and the on-site supply well shall be sampled and analyzed semiannually.
41. **1.h. Evaluation Monitoring, Prevention Measures, and Corrective Action:**
- a. Per subparagraph 62-701.510(6)(a)2., F.A.C., please revise 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. Per subparagraph 62-701.510(6)(a)3., F.A.C., please revise 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. Per subparagraph 62-701.510(6)(a)4., F.A.C., please revise to indicate a contamination evaluation plan should be submitted to the Department within 180 days of notification from the Department to initiate evaluation monitoring.
 - d. Per subparagraph 62-701.510(6)(a)5., F.A.C., please revise to indicate 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.
42. **Table 1:**
- a. Indicates monitoring wells MW-18B, MW-19A and MW-20B are compliance wells; however, MW-18B, MW-19A and MW-20B are listed as detection wells in Permit No. 177982-024-SO/T3. Please explain this discrepancy and provide revisions to Table 1 as needed.
 - b. Please revise table from listing monitoring wells MW-21A, MW-21B, MW-22A, MW-22B, MW-23A and MW-23B as “Existing” wells to “Future” wells.
 - c. Future monitoring well MW-23A is listed as a compliance well while future well MW-23B is listed as a detection well. Please explain.
43. **Figure 1 – Site Monitoring Network:** Monitoring wells MW-18B, MW-19A and MW-20B are labeled as compliance wells. A revision may be needed based on response to Comment #42.a. above.

Section 6 - Water Quality Monitoring Evaluation [Paragraph 62-701.510(8)(b), F.A.C.]

44. **1.0 Introduction:**
- a. Please revise monitoring well network to include MW-5AR and MW-5BR as compliance wells.
 - b. Monitoring wells MW-18B, MW-19A and MW-20B are listed as detection wells. Revisions may be needed based on response to Comment #42.a. above.
45. **Attachment 1 - Site Map:** Monitoring wells MW-18B, MW-19A and MW-20B are labeled as compliance wells. Revisions may be needed based on response to Comment #42.a. above.

Section 7 - Closure and Reclamation Plan [Rules 62-701.600 and 62-701.630, F.A.C.]

46. **1.10 Notice and Advice to Users:** It appears that text may be missing or have been inserted incorrectly into the first sentence of this section, creating two contradictory timelines for notice to users of facility closure. Please review and revise as necessary.
47. **Appendix 7-A Financial Assurance Cost Estimates:** Please provide recalculated cost estimates, including the information, calculations, and/or assumptions utilized in support of each unit quantity and the third-party quotes utilized in support of each unit cost, per Paragraph 62-701.630(4)(b), F.A.C.