



Florida Department of Environmental Protection

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REQUEST FOR ADDITIONAL INFORMATION

December 18, 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 No.: 177982-028-SO/T3

Dear Mr. Arnold:

Thank you for your renewal application for operation of the above referenced Facility. The Department has assigned DEP Application Nos. 177982-028-SO/T3 to the application. A Department staff review of the application and supporting documentation submitted on November 20, 2018, indicates the application 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 30 days of the date of this letter, January 18, 2019. 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 nancy.gaskin@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 nancy.gaskin@floridadep.gov, alerting us that it has been posted.

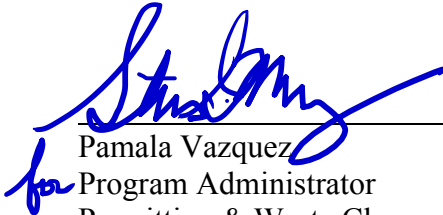
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In order to ensure the next submittal will be as complete as possible, the Department requests that a meeting be scheduled prior to submitting a response in order to discuss the draft submittal. Please contact Nancy Gaskin to schedule a meeting time and date. If you have any questions, please contact Nancy Gaskin by telephone at 813-470-5796 or by e-mail at nancy.gaskin@floridadep.gov.

Sincerely,



Pamala Vazquez

Program Administrator

Permitting & 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
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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.: 177982-028-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

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

1. **Part D:** The response to item 11 cites the wrong locations in the application for those documents. Please correct that reference.
2. **Part E:** In the response to item 2, the naming used to cite drawings is not consistent with the 2018 Plan Set submitted. Please revise this reference accordingly.
3. **Part G:** In the response to item 9.a, Reference 1 is cited and it is unclear which document is referring to in this application. Please clarify this reference and revise this item accordingly.
4. **Part I:** Item 1.a. refers to a 2016 geotechnical report from the Cell 16 Construction Permit Application. A reference to this report is removed from section 3.14 of the Engineering Report. Please revise this section of the engineering report to remain consistent.
5. **Part K:** The response to item 2.j., 8.e. and h incorrectly indicated that this information is given in Section 10.2 of the Engineering Report. Section 10.2 is in the Operation Plan and does not provide the information referenced. Please revise this response and the Operation Plan accordingly. Please explain why the response to Item 8.a. indicates that leachate level monitoring results will be submitted to the Department.

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

6. **3.8 Method of Cell Sequence:** It appears the drawings were changed, but this description of Phasing Sequence 1 & 2 was not changed to match the drawings. All filling now occurs during Phasing Sequence 1 with Phasing Sequence 2 being identified as conceptual closure. Please verify and revise this section and Section 8.1 of the Operation Plan, as appropriate.
7. **3.10.0 Leachate Control:** This section provides an incorrect clay hydraulic conductivity which is also inconsistent with other portions of this application and the current facility permit. Please revise this rate to 1×10^{-8} cm/s as required.
8. **3.14 Foundation Analysis:** Part I, Item 1.a. refers to a 2016 geotechnical report from the Cell 16 Construction Permit Application. A reference to this report is removed from this section of the engineering report. Please revise this section of the Engineering Report to remain consistent.

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

9. **8.1 Cell Sequence:** It appears that drawings were changed, but this description of Phasing Sequence 1 & 2 was not changed to match the drawings. All filling now occurs during Phasing Sequence 1 with Phasing Sequence 2 being conceptual closure. Please verify and revise this section and Section 3.8 of the Engineering Report, as appropriate.

Section 4 - 2018 Plan Set

10. **Sheet C1.00:** East Detail 1 references sheet C1.20 as the detail location. This plan set does not contain a sheet C1.20, please revise this detail.
11. **Sheet C1.10:** Both cross section A-A and B-B incorrectly list the location of the permitted north berm detail to be this page. Please correct this label to list C1.00.
12. **Sheet C2.00:** See questions #6. and #9 above.
13. **Sheet C4.00:** In the Leachate Collection Wetwell Typical Illustration Section, Detail 1 is referenced as showing both the influent (HDPE) and effluent (PVC) pipes. This detail only references an HDPE pipe as is used with the influent only. Please revise this detail or this reference.

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

14. **1.g.(1) Sampling Frequency and Requirements:** Please revise to indicate groundwater samples from all newly installed monitoring wells will be collected within 7 days of well completion to determine background groundwater quality.
15. **Figure 1 – Site Monitoring Network:**
 - a. The symbol used for monitoring wells MW-23A and MW-23B indicate they are to be proposed compliance monitoring wells. Please revise the symbol(s) for MW-23A/B to the “proposed detection monitoring well location” symbol.
 - b. The symbol for “proposed detection monitoring well location” has been removed from the legend. However, future monitoring wells MW-21A, MW-21B, MW-22A, MW-22B are still correctly using this symbol. Please reinstate this symbol into the Legend.

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

16. Attachment 1 - Site Map:

- a. Please revise the figure title from Site Monitoring Network to Site Map to be consistent with Table of Contents and Attachment 1 title page.
- b. The symbol used for monitoring wells MW-23A and MW-23B indicate they are to be proposed compliance monitoring wells. Please revise the symbol(s) for MW-23A/B to the “proposed detection monitoring well location” symbol.
- c. The symbol for “proposed detection monitoring well location” has been removed from the legend. However, future monitoring wells MW-21A, MW-21B, MW-22A, MW-22B are still correctly using this symbol. Please reinstate this symbol into the Legend.

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

Appendix 7-A Financial Assurance Cost Estimates:

DEP Form #62-701.900(28), F.A.C.

IV. Estimated Closing Costs.

17. **Item 3 Cover Material:** This part lists a different cubic yard quantity than that listed in Reference I which is cited as the basis for this pricing. Please verify that this vendor cost per unit still applies to this different number of units or provide a revised estimate. Additionally, the explanation provided for this item in Attachment 1 of this section lists a 1×10^{-7} as the hydraulic conductivity for this material while the estimate correctly lists the conductivity as 1×10^{-8} . Please revise this section accordingly.

Please be advised that as the clay liner has a conductivity of 1×10^{-8} , this barrier layer must have a conductivity equal or less than that conductivity.

18. **Item 4 Soil Cover:** The number of units listed here is inconsistent with the number given as part of the Reference 1 which is the basis for this Item. Please verify that this vendor cost per unit still applies to this different number of units or provide a revised estimate.

19. **Item 5 Vegetative Layer:** This part lists 3000 square feet as the number of units needed. The estimate provide in Reference 1 is based on a 1100 square yard number of units. Please verify that this vendor cost per unit still applies to this different number of units or provide a revised estimate. Additionally, this item lists 4 return trips for maintenance at a total of \$2,000. Reference 1 does not indicate the number of return trips and lists a total cost of \$33,500. Please explain this inconsistency and provide any relevant revisions required.

20. **Item 6 Stormwater Control System:** This item lists 3,119 linear feet for piping while Attachment 1 indicates 2,194 linear feet will be needed. Please indicate which number is correct. This item list 12 control structures while Attachment 1 indicates there will be 14. Please clarify how many control structures will be installed.

21. **Item 7 Passive Gas Control:** This section indicates there are 9 gas wells and 6 gas probes planned. Attachment 1 indicates that these future wells are shown on the 2018 Plan Set. Sheet C0.03 shows 7 future gas probes and Sheet C.2.00 shows 10 future passive LFG vents. Please clarify the number of probes and vents planned and revise this estimate accordingly. Attachment 1 refers to Reference 6 to verify the prices listed. This reference is more than a year old and is therefore outdated. Please provide a more recent quote for the installation of these probes and vents.

22. **Item 13 Site Specific Costs:** Attachment 1 refers Reference 2 for mobilization costs. Reference 2 does not list the cost listed here for mobilization. This item also lists Reference 7 as the source for disposal costs. The total amounts given in both references do not match what is listed in this item. In addition, it appears that Reference #7 is from 2012 and therefore outdated. Please revise this item to be consistent with the vendor costs provided or provide revised estimates.

V. Annual Cost for Long-Term Care

23. **Item 1 Groundwater Monitoring:** Based on Table 1 of Section 5 of this application the number of wells listed is incorrect. Please revise this item to reflect the correct number of wells (23).

24. **Item 5 Leachate Collection/Treatment Systems:** It is unclear how the figure given here is an annual cost as Attachment 1 indicates that this cleaning will occur every 5 years. Therefore, the

figure given for annual costs should be a fifth of the cost listed. Additionally, Reference 9 is a quote given to a different facility. Please clarify the cost listed here and provide a reference specific to this facility.

25. **Items 9 -11:** Please provide further information or a reference to support these assumed figures.
26. **Item 12 Utilities:** Attachment 1 states that the facility does not have a leachate collection system. Section 10.2 of the Operation Plan submitted with this application details a leachate collection system including a dedicated float triggered pump. Please revise this estimate accordingly.
27. **Attachment 1:** The first page of this attachment indicates that this is a permit modification application. Please revise this statement.