



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

June 28, 2019

By-Email
kirk.wills@wasteconnections.com

Kirk Wills, Southern Region Engineer
Waste Connections of Osceola County, LLC
1501 Omni Way
St. Cloud, FL 34773

RE: Request for Trial Period for Use of Quick Cover as Alternate Initial Cover
J.E.D. Solid Waste Management Facility
WACS 89544

Dear Mr. Wills,

Thank you for your letter dated June 27, 2019, requesting permission to use Quick Cover as alternate initial cover. Quick Cover is described as a blend of cellulose fiber mulch and a binding agent that form a slurry when mixed with water. Quick Cover application is described as spraying with a commercial hydro-seeder or ADC application machine pulled by a tractor or other landfill equipment.

Initial cover as defined in Rule 62-701.200(53), F.A.C., is a 6-inch layer of compacted earth, or "other materials or thickness approved by the Department, that minimizes vector breeding, animal attraction, and fire potential, prevents blowing litter, controls odors, and improves landfill appearance." As long as the specified materials meet the conditions as set forth in Chapter 62-701, F.A.C., we agree that these materials can be used as initial cover with the following conditions.

The Department authorizes a trial period of 120 days from the date of this letter with the following restrictions:

- The material shall be applied per the manufacturer's specifications.
- The material shall only be used as alternate initial cover on the interior slopes of the landfill where contact stormwater is not expected to runoff into the stormwater system.

- The Central District office shall be notified when use of this material begins at phone # 407-897-4100 or by e-mail to DEP_CD@dep.state.fl.us, in order for staff to schedule inspections of the Facility during operation.
- The following information will be collected and submitted to the Department at the end of the trial period:
 - Documentation, including observation and photographs at the following times
 - After application
 - The following day, prior to disturbance of the cover.
 - Weather conditions
 - Location of application

If the trial period proves successful and there is a desire to continue using Quick Cover as initial cover, then you must submit an application for a minor permit modification to the facility's Operation Permit to add the material as alternate initial cover. The request for modification should describe how, where, and when the materials will be used and language in the Operation Plan should also be updated to include their use. The application for this permit modification shall be submitted to the Tallahassee office for approval with a copy to the Central District office (DEP_CD@dep.state.fl.us).

If the trial period is not successful, then we request you please submit a notification to the Central District stating that the trial has ended, and Quick Cover will not be used as alternate initial cover. If more than 120 days is necessary for the trial period, please contact the Tallahassee office for approval to extend the trial period with a copy to the Central District.

If you have any questions, feel free to contact El Kromhout by phone at (850) 245-8744, or by email at elizabeth.kromhout@floridadep.gov or the Central District by phone at 407-897-4100 or by e-mail to DEP_CD@floridadep.gov.

Sincerely,



Cory D. Dillmore, P.E.
Environmental Administrator
Solid Waste Section

Cc:
El Kromhout, P.G., FDEP Solid Waste, elizabeth.kromhout@floridadep.gov
DEP_CD@dep.state.fl.us