



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valensteln
Secretary

REQUEST FOR ADDITIONAL INFORMATION

August 2, 2019

John Arnold, P.E., Director of Engineering & Facilities
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.: 177982-029-SO/T3

Dear Mr. Arnold:

Thank you for your application for a minor modification to your operation permit submitted on July 11, 2019 for the above referenced Facility. A review of your application and supporting documentation indicates the application is incomplete. Please provide the information in the attached document and refer to this RAI in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional.

To continue the processing of your application, the Department must receive a response within 90 days of this letter, October 31, 2019, unless a written request for additional time to provide the requested information is submitted and approved. It is the Department's desire to provide prompt turnaround times on permit applications, and a quicker response to this RAI shortens the timeframe for which a final decision on the application can be made. Pursuant to Rule 62-4.055(1), Florida Administrative Code (F.A.C.), failure of an applicant to provide timely requested information by the applicant deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

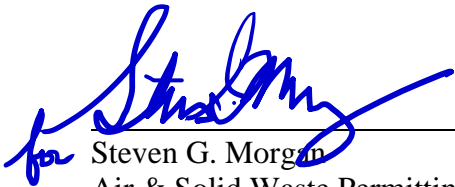
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Your processor will be Justin Chamberlain and can be contacted by phone at (813) 470-5725, or by email at justin.chamberlain@floridadep.gov. Please submit your response by email to SWD_waste@dep.state.fl.us, with a copy to justin.chamberlain@floridadep.gov. If the submittal 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 submittal, send an e-mail to SWD_waste@dep.state.fl.us, with a copy to justin.chamberlain@floridadep.gov, alerting us that it has been posted.

Sincerely,

A handwritten signature in blue ink, appearing to read "for Steven G. Morgan", is written over a horizontal line.

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

cc: John Locklear, P.G. Locklear & Associates, Inc., john@locklearconsulting.com
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, P.G., DEP Southwest District, justin.chamberlain@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.: 177982-029-SO/T3

Application to Construct, Operate, Modify, or Close a Solid Waste Management Facility (DEP Form # 62-701.900(1), F.A.C.), dated and received July 11, 2019

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.

Introduction

2. The Operations permit # referenced in this section is incorrect. The permit # should be 177982-028-SO/T3. Please revise.

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

3. **Part A.7.:** The datum used to obtain the latitude/longitude coordinates was listed as "National Geodetic Vertical Datum of 1929 (NGVD 29)". This is a vertical, not horizontal datum. Please revise to reflect the proper horizontal datum used (i.e. North American Datum of 1983 (NAD83)).
4. **Part A.17.:** The expected weight of waste is given as 550 +/- tons/day. This is inconsistent with the amount provided throughout the rest of the application documents (approx. 1500 tons/day).
5. **Part G.2.f.(4)(a) through (d), (f) and (g):** The application form indicates specifications from the listed parts are provided in the Engineering Report. However, it does not appear these specifications were supplied with Section 3 of this application. Please review and revise this part accordingly.

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

6. **3.1 General:** This section indicates the report is part of a permit renewal application. Please revise this section to describe this permit modification application.
7. **3.5 Soils:** The report indicates Astatula fine sand has a seasonal high water-table that is typically at 72 inches. However, the cited reference indicates the high water table for Astatula fine sand is at a depth greater than 72 inches. Please revise section accordingly.
8. **3.7 Excavation Operations and Cell Construction:** Please provide additional details on how the minimum requirements for the liner will be achieved.
9. **3.8 Method of Cell Sequence:**
 - a. **Phasing Sequence 3:** Please revise to indicate the top of waste will be graded from 212' to 217'.
 - b. **Phasing Sequence 4:** See Comment #30, below. Please include the correct percent range for the top grade of the cover system.

10. **3.8.1 Vertical Expansion / Conceptual Closure:** The final sentence of this section indicates the top to be sloped from 1% to 2% grade and side slopes to have slope of 3:1V and 4H:1V. However, this is inconsistent with the Phasing Sequence 4 conceptual closure drawings in the Plan Set. Please revise text and/or drawings accordingly.
11. **3.8.2 Erosion Control:** The third bullet discusses after construction of the clay layer, “begin to fill against Cell 7 2H:1V slope”. This appears to be obsolete. Please review text and remove or revise accordingly.
12. **3.8.3 Life Expectancy:** The bulleted assumptions utilized to build the three-dimensional AutoCAD model for cell capacity appears to use side slopes ratios, bench elevations and waste elevations in the calculation that are inconsistent with those provided in the Plan Set and the Operation Plan. Please recalculate using the most recent conceptual closure numbers and revise section, including airspace volume remaining and remaining life, accordingly.
13. **3.10.1.1 Gas Probe Locations:** Please revise the text to indicate: GP 1 through 5 and 16 are proposed and will be installed as part of future cell construction **or** completion certification at closure.
14. **3.10.2 Leachate Control:** Please revise discussion to indicate that if leachate is discovered to be hazardous, it will be managed as hazardous waste.
15. **Table 3.10 - Gas Probe Installation Schedule:**
 - a. The table does not include information on gas probes GP-4 and GP-5. Please revise to include these gas probes in the table.
 - b. The table footnotes appear obsolete as all gas probes that were located immediately adjacent to the disposal area have been removed and replaced with probes along the east property boundary. Please remove/revise footnotes accordingly.
16. **3.11 Erosion Control:** This section indicates the landfill side slopes will be constructed at 3H:1V from base grade to elevation 220’ NGVD. This elevation is inconsistent with the elevation provided in the Plan Set and the Operation Plan. Please revise text accordingly (to 212’ NGVD).
17. **3.15 Certification:** Please provide additional discussion and descriptions of field test methods, including rejection criteria and corrective measures to insure proper soil liner.

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

18. **1.0 Designation of Responsible Person(s) and References:** This section indicates “[u]pdated plan sheets and figures are provided in Sections 3 and 4”. Please revise to clarify as only updated plan sheets were provided in Section 4 and that the Section 3 figures were unchanged and therefore are referenced and not provided as part of this application.
19. **8.2 Erosion Control:** The first bullet discusses after construction of the clay layer, “begin to fill

against the 2H:1V slope”. This appears to be obsolete. Please review and remove/revise accordingly.

20. **10.2 Leachate Control:** Please revise discussion to indicate that if leachate is discovered to be hazardous, it will be managed as hazardous waste.
21. **15.0 Landfill Personnel:** The operating hours included in the typical work schedule table does not match the hours of operation listed on the Facility Entrance Sign (Attachment 1). Please revise table and/or Attachment 1 accordingly.
22. **17.0 Equipment Inventory:** The equipment inventory list does match the equipment listed as currently onsite at the facility as provided in Section 4.0 of the Operation Plan. Please review and revise accordingly.
23. **23.0 Certification:** Please provide additional discussion and descriptions of field test methods, including rejection criteria and corrective measures to insure proper soil liner.
24. **Attachment 1 – Facility Entrance Sign:** See Comment #21, above. If the hours of operation listed in Section 15.0 of the Operation Plan are correct, please update the entrance sign and provide photographic documentation.
25. **Attachment 4 – Gas Monitoring Survey Form:** Section 3.10.1.1 of the Engineering Report indicates that GP-16 is a proposed monitoring location. However, this form does not indicate gas probe GP-16 as being “not installed”. Please revise form accordingly.
26. **Attachment 6 - Training Certificates [Rule 62-701.320(15)(b), F.A.C.]:** The supplied training certificates are out of date. Please provide updated training certificates.

Section 3 - Appendix 3-B Contingency Plan [Rule 62-701.320(7)(e)2., F.A.C.]

27. **1.2 Major Storm or Disaster 5.:** This section indicates the emergency equipment locations, such as first aid and eye wash stations, are shown on Site Plan. However, the Site Plan included in the Plan Set (Section 4.0), does not have these items labeled. Please review and revise text and/or drawing accordingly.

Section 4 - Operations Plan Minor Modification Permit Plan Set [Rule 62-701.320(7)(f) & 62-701.330(3)(b), F.A.C.]

28. **Drawing C0.02 – Aerial Site Plan:** Pond No.3. is existing and the TOP and BTM elevations are not provided. Please revise drawing accordingly.
29. **Drawing C0.03 – Site Plan:**
 - a. The map symbol for gas probe GP-11 indicates the probe is “to be abandoned”. However, GP-11 has already been abandoned. Please remove GP-11 from the site map.
 - b. The map symbol for gas probe GP-11R indicates it is a “future gas probe location”; however, this gas probe has already been installed. Please revise the map symbol for this probe to indicate it as a “gas probe location”.

30. **Drawing C3.00 – Phasing Sequence No. 4 Conceptual Closure:** The top of concept closure indicates final top slopes of 2% MIN and 4% MAX which appears inconsistent with the percent range of top slopes indicated within Sections 3 and Appendix 3-A. Please review and revise drawing/text accordingly.
31. **Drawing C3.10 – Phasing Sequence No. 4 Conceptual Closure Sections:** See Comment #30, above and revise drawing accordingly.

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

32. **1.e. Surface Water Monitoring Requirements:** This section references an outdated operation permit which has been replaced with the current permit #177982-028-SO/T3. Please revise section accordingly.
33. **1.g.(2) Sampling Frequency and Requirements:** This section references an outdated water quality monitoring plan evaluation report (2012 WQMPE). Please revise text to refer to the most recent flow velocity determination submitted within the Groundwater Monitoring Technical Report 2015 – 2017, dated March 2018.
34. **Figure 1 – Site Map:**
- a. The map symbol for gas probe GP-14 indicates the probe is current “gas probe location”. However, GP-14 has already been abandoned. Please remove GP-14 from the site map.
 - b. The map symbol for gas probe GP-14R indicates it is a “future gas probe location”; however, this gas probe has already been installed. Please revise the map symbol for this probe to indicate it as a “gas probe location”.
 - c. The site map does not show the locations of monitoring wells MW-3, MW-3B and MW-17B which are scheduled to be abandoned during the construction of Cell 17. This is inconsistent with Drawing C0.03 of the Plan Set which shows the monitoring wells with map symbols indicating they are to be abandoned. Please revise Figure 1 to include the wells.