



# FLORIDA DEPARTMENT OF Environmental Protection

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Tallahassee, FL 32399-2400

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

September 30, 2019

***Sent by Electronic Mail – Received Receipt Requested***

Tobin McKnight  
Department Manager/Vice President  
Jones Edmunds  
730 NE Waldo Road  
Gainesville, Florida 32641  
[TMcKnight@JonesEdmunds.com](mailto:TMcKnight@JonesEdmunds.com)

RE: Pasco County Resource Recovery Facility (PA87-23)  
Petition to Modify Conditions of Certification (Mod E)  
Request for Additional Information

Dear Mr. McKnight:

On August 30, 2019, the Siting Coordination Office received a petition from Pasco County for a modification to the Pasco County Resource Recovery Facility (RRF) Site Certification. The petition includes the following items regarding the RRF landfill Class I Solid Waste Cells SW-1 and SW-2:

- Modification of the side slopes to three horizontal to one vertical (3H:1V), and
- vertical expansion of Cells SW-1 and SW-2 by 20 feet to a final buildout elevation of 121 National Geodetic Vertical Datum (NGVD)

Additional information is needed in order to make an adequate review of the submitted petition. The Department of Environmental Protection (DEP) Solid Waste Section has the following requests and comments:

Closure Cost Estimates, Rule 62-701.630(3), F.A.C. The recalculated 2019 cost estimates submitted as part of the proposed modification were compared with the recalculated costs submitted dated August 27, 2018, which were approved by the Department. As a result, the comments below are provided as a result of this comparison.

- (1) Closure Cost Estimate, Item 3, Cover Material. The 2019 unit rates for 40 mil synthetics of \$4.14/sy and geocomposite synthetics of \$5.43/sy are lower than those provided in the recalculated estimate dated August 27, 2018, which were \$5.50 for 40 mil synthetics and \$7.50 for geocomposite synthetics. Please explain the reason for the lower costs in the August 2019 estimate.

- (2) Closure Cost Estimate, Item 4, Top Soil Cover. The 2018 closure cost estimate included costs for off-site material, delivery, and spread, for a total of \$1,689,765, for 88,935 cy. The 2019 costs did not include a cost for delivery, and had a total cost of \$1,640,454.00, for 92,160 cy, which is lower for a larger volume than the 2018 estimate. Please explain why the 2019 estimate for a larger volume is lower than the August 2018 estimate.
- (3) Closure Cost Estimate, Item 5, Stormwater Control System. The 2018 closure cost estimate included costs earthwork, 2,600 feet of piping, 7 control structures at \$22,625 each, and 7,046 cy of pipe trenches, for a total of \$378,425.08. The 2019 closure cost estimate contained 377 feet of 12-inch piping, 499 feet of 18-inch piping, and 10 control structures at \$3,957 each, for a total cost of \$100,447.00. Please provide the reason for revisions to the stormwater control system in 2019 and associated lower cost.
- (4) Closure Cost Estimate, Item 9, Security System. The August 2018 closure cost estimate included a cost of \$2,000 for signs. This cost was not included in the 2019 estimate. Please indicate how or if the signs included in the 2018 estimate will be provided for future closure activities.
- (5) Closure Cost Estimate, Item 10, Engineering. The August 2018 closure cost estimate included a cost of \$420,000 for engineering versus \$338,608 in the 2019 estimate. Please provide the reason for the lower cost in 2019.
- (6) Closure Cost Estimate, Item 11, Professional Services. The August 2018 closure cost estimate included a cost of \$450,000 for professional versus \$348,200 in the 2019 estimate. Please provide the reason for lower cost in 2019.
- (7) Closure Cost Estimate, Item 13, Site Specific Costs. A cost of \$364,111 was included in the 2019 estimate for mobilization, bonds, and insurance. Please explain why this item was not included in the August 2018 estimate, and is now included in the 2019 estimate.
- (8) Long Term Care, Item 13, Leachate Collection Treatment Systems Operation. The August 2018 long term care estimate included 2,080 hours for an on-site technician at \$35.00/hr. for a total of \$72,800. The 2019 estimate included 416 hours for an on-site technician at \$85.00/hr. for a total of \$35,360.00. Please provide the reason for lower number of hours on-site, and lower cost in 2019.

RAI – Pasco County RRF Mod E

September 30, 2019

Page 3 of 3

If you have any questions regarding this request, you can contact me at (850) 717-9113, via email [ann.seiler@floridadep.gov](mailto:ann.seiler@floridadep.gov), or Jim Jarmolowski with the FDEP Solid Waste Section at (850) 245-8856, via email [james.jarmolowski@floridadep.gov](mailto:james.jarmolowski@floridadep.gov).

Sincerely,

Ann Seiler

Siting Coordination Office

CC by email:

Cindy Mulkey, FDEP, SCO Administrator: [cindy.mulkey@floridadep.gov](mailto:cindy.mulkey@floridadep.gov)

John Powers, Solid Waste Director: [johnpower@pascocountyfl.net](mailto:johnpower@pascocountyfl.net)

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