



Florida Department of Environmental Protection

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Charlie Crist
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By E-Mail
smccash@wasteservicesinc.com

Mr. R. Shawn McCash
Senior Vice President
Omni Waste of Osceola County, LLC (Omni)
1501 Omni Way,
St. Cloud, FL 34773

OCD-SW-08-0451

Osceola County – SW
J.E.D Solid Waste Management Facility, Class I
Cell 6 Operation – Minor Modification
Minor Modification of Permit No. SC49-0199726-008
First Request for Additional Information for Permit Application No. SO49-0199726-009

Dear Mr. McCash:

The Department received your application for a minor modification to SC49-0199726-008. The application was dated July 28, 2008; it was received July 30, 2008. The minor modification was submitted to comply with Specific Condition No. 60 of the permit. As required, the application provided the updated closure and long-term care cost estimates and Certification of Construction for Cell 6. After the new cost estimate is approved, the financial assurance mechanism must be updated.

The application materials included the certification that all construction of Cell 6 had been completed. The Department has some questions about the certification (see Attachment A). Because of Tropical Storm Fay, the Department's inspection of Cell 6 has been delayed. It is scheduled for September 4, 2008. Therefore, the Department has not yet approved the certification of construction for Cell 6.

The application is incomplete. Please provide the information listed on the attached sheets promptly. Evaluation of your application will be delayed until all the requested information has been received. Disposal of waste in Cell 6 is not permitted at this time.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact me at (407) 893-3328 or at tom.lubozynski@dep.state.fl.us.

Sincerely,



F. Thomas Lubozynski, P.E.
Waste Program Administrator

Date: August 27, 2008

FTL/gc/ew

Attachments:

- A. RAI for "Certification Report Construction of Cell 6"
- B. RAI for "Minor Modification Application for Phased Financial Assurance Cell 6 Construction"

cc: Kwasi Badu-Tweneboah, P.E. – Geosyntec Consultants, Tampa, FL 33637
kbadutweneboah@geosyntec.com
Jim Bradner, Air Program james.bradner@dep.state.fl.us

A. Note that all references to "Report" in the following text refers to the document entitled, "Certification Report Construction of Cell 6", prepared by Geosyntec Consultants, 14055 Riveredge Drive, Suite 300, Tampa, Florida 33637, dated July 2008.

1. Page 1-1, Section 1.1 Overview, Paragraph 3, First sentence in the report reads "The CQA activities were performed.....with Construction Permit SC49-0199726-007..." The Permit No. is SC49-0199726-008. Submit the revised page or if you prefer the Department will make correction.
2. Page 2-1, Section 2.1, Paragraph 3, Second last sentence in the report reads "The footprint of Cell 6 is approximately 12.5 acres". The DEP Form # 62-701.900(2), Titled "Certification of Construction Completion" submitted along with this Report on line 8 reads "Site Acreage: Cell 6, Approx. 12 Acres". Provide the correct acreage footprint information in the Report and accordingly revise the DEP Form # 62-701.900(2).
3. Page 3-4, Section 3.4, Certification Report and Record Drawings, Paragraph 2, last sentence reads "Resultshave been summarized in a tabular form and are included in this certification report." Revise the sentence to provide details of where the tabular form is located in the Report.
4. Page 4-5, Section 4.4.5, Anchorage of Geosynthetics does not include a description of the how the geosynthetics panels were tied into respective layers of geosynthetics from Cell 3 and Cell 5. Include a brief description accordingly in this section of the Report.
5. Page 5-18, Section 5.8, Other Related Geosynthetics Work, last sentence reads "These panels have been noted on the Secondary geomembrane panel layout drawing". Please provide the drawing number and the location of this drawing in the Report.
6. Appendix C-2, As-Built Liner Panel Layout Drawings From Comanco: In accordance with Rule 62-701.320(7)(f)2, FAC, the as-built panel layout drawings need to be signed and sealed by a Florida Licensed Professional Engineer. Additionally, Appendix C-2 includes two drawings (Cell 6 - 60 mil textured primary, and secondary layers) and both the drawings are labeled as DWG. NO:
1. Revise the Drawing Numbers.
7. The Table of Contents of this report on Page iv, lists Appendix M to contain CQA Laboratory Test Results for Primary and Secondary Geocomposites and Geotextile. However, the CQA Laboratory Test Results for the Geotextile are missing in the Appendix M submitted electronically in the PDF file format on a Compact Disc along with this Report. Please provide these result electronically.

B. Note that all references to "Report" in the following text refers to the document entitled "Minor Modification Application for Phased Financial Assurance Cell 6 Construction", prepared by Geosyntec Consultants, 14055 Riveredge Drive, Suite 300, Tampa, Florida 33637 dated July 2008.

8. Attachment No. 1 of this Report - On Page 5 of 40, DEP Form 62-701.900(1), item no. 13, asks for the date the site, that is, Cell 6, will be ready to be inspected for completion. Because of Tropical Storm Fay the scheduled Construction Completion inspection had to be delayed until September 4, 2008.
9. Following comments pertain to Attachment 2 of this Report – Financial Assurance Cost Estimate
 - a) On Page 1 of 11, DEP Form 62-701.900(28) lists the acreage of Cell 6 as 12.0 Acres. Clarify if the acreage of Cell 6 is 12.0 Acres or approximately 12.5 Acres as noted in Comment no. 2 of this correspondence.
 - b) Total Cell 6 acreage included in this cost estimate is 12.0 Acres. If the 12.0 acres is the area based on the footprint, then all surface area and volume calculations for cover and vegetation need to be revised. The area and volume calculations must use the surface area, which includes the side slope areas and is larger than the footprint area. Please provide the calculations which will form the basis of surface area cover material and vegetation to properly close the facility.
 - c) Submit the revised cost estimate to incorporate the changes listed above (Comment 9 a. and 9 b.), signed and sealed by a professional engineer licensed in Florida.
10. A financial mechanism must be funded in the amount of the sum of the total closure and long-term care costs specified in the approved cost estimate and accepted by the Department's Financial Coordinator before this application can be deemed complete. At this time the cost estimate has not been approved. Financial responsibility arrangements for the facility for the approved amounts are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and a copy of the approval letter submitted to: Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.