



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

November 7, 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: Second 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.: 177982-029-SO/MM

Dear Mr. Arnold:

Thank you for the additional information submitted on October 30, 2019, for DEP Application No. 177982-029-SO/MM for a permit modification. The additional information has been reviewed and the items in the attached document remain incomplete. Please provide the remaining information 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, February 5, 2020, 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), F.A.C. and Section 120.60, F.S., failure of an applicant to provide timely requested information by the applicant deadline may result in denial of the application. To ensure the response will complete your application, the Department requests that a meeting be scheduled prior to submitting a response to discuss the draft submittal. Once you have a draft submittal, contact Justin Chamberlain to schedule a meeting time and date. If you have any questions, please contact Justin Chamberlain by telephone at (813) 470 5725 or by e-mail at justin.chamberlain@floridadep.gov.

Please submit your response by email to swd_waste@floridadep.gov, with a copy to justin.chamberlain@floridadep.gov.

Angelo's Aggregate Materials, LTD

Page 2 of 4

November 7, 2019

Sincerely,



Pamala Vazquez
Program Administrator
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
Justin Chamberlain, P.G., DEP Southwest District, justin.chamberlain@floridadep.gov
Southwest District Solid Waste Compliance Section, swd_waste@floridadep.gov

Attached: List of Requested Information

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John Arnold, P.E., Director of Engineering & Facilities

Facility Name: Enterprise Road Class III Recycling and Disposal Facility

Facility ID: 87895

DEP Application No.: 177982-029-SO/MM

Response to First Request for Additional Information (RAI), dated October 25, 2019 and received October 30, 2019

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

1. **Section 3.8 Method of Cell Sequence, Phasing Sequence 3:** The response dated October 25, indicates that the correct top slopes of waste should be 2% MIN and 4% MAX. However, this section still reflects top slopes of 1% to 2%. Please revise accordingly.
2. **Section 3.8 Method of Cell Sequence, Phasing Sequence 4:** This section was revised to indicate that the closure design will include constructing sideslope berms "(2% min to 4% max)"; however, the plan set sheet C3.00, Detail 1, indicates the closure berm has a slope of 2H:1V. Please revise accordingly.
3. **Section 3.8.3 Life Expectancy:**
 - a. The bulleted assumptions utilized still list side slopes ratios (4H:1V), top slope grade (1 to 2%), bench elevations (122' and 147') and waste elevations (122', 147', 167', 172') that are inconsistent with those provided in the Plan Set and the Operation Plan. Please revise the assumptions accordingly.
 - b. The bulleted assumption of 36 inches of cover over 67.0 acres. This acreage does not include Cell 17, only Cells 1 – 7 and 15 – 16. Please revise the acreage amount to include Cell 17.
 - c. The narrative indicates the airspace volume remaining calculated was, as of October 2019 and that the calculation accounted for a final cover volume of 322,829 cubic yards. Please explain how the airspace volume remaining was determined beyond the use of data from the October 2018 topographic survey and ensure an accurate final cover volume is used. Please review and revise accordingly.
 - d. After addressing Comments #3.a., b. and c., above, please recalculate: final cover volume, airspace volume remaining and remaining life, accordingly using the most recent/revised conceptual closure numbers and provide the calculation sheet(s).
4. **3.10.1.1 Gas Probe Locations:** The response dated October 25, indicates "*Gas probe locations have been updated to accurately reflect existing conditions which now include GP-4 and GP-5...*" As of the date of this correspondence, no completion data for gas probes GP-4 and GP-5 have been provided. Please provide As-builts and relevant survey data so that these probes may be properly incorporated into the permit modification.

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

5. **Section 8.1 Cell Sequence, Phasing Sequence 3:** The response dated October 25, indicates that the correct top slopes of waste should be 2% MIN and 4% MAX. However, this section still reflects top slopes of 1% to 2%. Please revise accordingly.
6. **Section 8.1 Cell Sequence, Phasing Sequence 4:** This section was revised to indicate that the closure design will include constructing sideslope berms "(2% min to 4% max)"; however, the plan set sheet C3.00, Detail 1, indicates the closure berm has a slope of 2H:1V. Please revise accordingly.

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

7. **Drawing C0.02 – Aerial Site Plan:** As previously indicated in RAI #1, Comment #28, Pond No.3. is existing and the top and bottom (TOP, BTM) elevations have not been provided on this drawing. Please revise accordingly.
8. **Drawing C0.03 – Site Plan:**
 - a. The revised drawing has been updated to include the now-installed monitoring wells associated with Cell 17. However, monitoring well MW-22B is not shown on the plan. Please revise accordingly.
 - b. As previously indicated in RAI #1, Comment #29.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".

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

9. **Figure 1 – Site Map:**
 - a. The site map has been updated to include the now installed monitoring wells associated with Cell 17. Monitoring wells MW-21B, MW-23B were not installed, however are shown on the plan as existing monitoring wells. Please revise to remove these wells.
 - b. Based on an October 31, 2019 site inspection and Drawing C0.03 of the site plan, it appears gas probe GP-5 is incorrectly located. Please revise figure accordingly.

Sequence of Filling Waste According to Plans [62-701.500(2)(f), F.A.C.]

10. **Site Inspection:** Following a March 12, 2019 inspection of the Facility, a Compliance Assistance Offer (CAO) was issued on April 3, 2019. A response to the CAO was submitted by Locklear & Associates, dated April 17, 2019 which acknowledged that landfilling was occurring at an elevation above what is listed in the current operation permit and indicated that landfilling activities were to be moved back to Cell 16 at this time. During an October 31, 2019 site inspection, the facility operator indicated that landfilling was not moved to Cell 16, but instead the permittee is continuing to fill in the areas, where according to the above April 17, 2019 submittal, landfilling was to cease. The permittee therefore continues to operate out of compliance with the current operation permit. Please provide documentation demonstrating that operation of the Facility has returned to compliance.