

## Chamberlain, Justin

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**From:** Chamberlain, Justin  
**Sent:** Monday, October 12, 2020 1:42 PM  
**To:** 'sandlandtf@yahoo.com'  
**Cc:** rickpotts@cfl.rr.com; Morgan, Steve; Tafuni, Steven;  
Solid.Waste.Financial.Coordinator@FloridaDEP.gov; SWD\_Waste; Madden, Melissa  
**Subject:** Sand/Land of Florida Enterprises, Inc (WACS ID No. 40148) - 5-Year Submittal RAI  
**Attachments:** 2020-10-07 5-Year Submittal RAI.pdf

Mr. Teelon:

Please find attached a request for additional information in regards to the 5-Year Submittal for the Sand/Land of Florida Enterprises, Inc C&D Disposal Facility. Please feel free to contact me if you have any further questions or would like to set up a teleconference to discuss this letter and/or your response.

Thank you,

Regards,  
Justin



**Justin Chamberlain, P.G.  
Professional Geologist I**

Florida Department of Environmental Protection  
Solid Waste Permitting & Waste Cleanup  
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**Note:** All your favorite people at the FDEP have new email addresses (@floridadep.gov)! Please make sure to update your contact list!

*For information on Solid Waste Permitting, please visit our [Solid Waste website](#):*

*For Waste Cleanup Program guidance and information, please visit our [Waste Cleanup website](#):*

*For information on the Florida Brownfields Redevelopment Program, please visit our [Brownfields website](#):*

**Permitting Consistency Initiative:** The Florida Department of Environmental Protection is committed to providing efficient, consistent and quality service to the citizens of Florida.

In keeping with these objectives, we continue to identify ongoing improvements to our permitting process by standardizing and simplifying our documents.



# 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 Valenstein**  
Secretary

October 12, 2020

Mr. Charles W. Teelon, President  
P.O. Box 328  
Holder, Florida, 34445  
[sandlandtf@yahoo.com](mailto:sandlandtf@yahoo.com)

RE: Five Year Submittal Report, dated July 15, 2020 and  
Monitoring Plan Evaluation Report, 5-Year Period 2015 – 2019, dated June 30, 2020  
Sand/Land of Florida Enterprises, Inc.  
5920 North Florida Avenue, Hernando, Citrus County, Florida, 34442  
WACS Facility ID No. 40148  
FDEP Permit No. 21306-010-SO/22

Dear Mr. Teelon:

On July 29, 2020, the Florida Department of Environmental Protection (Department) received a 5-Year Permit submittal entitled Five Year Submittal Report, dated July 15, 2020 by Mr. Louis Paveglio, pursuant to Specific Condition 2.A.5 of Permit No. 21306-010-SO/22 as modified by 21306-011-SO/MM and 21306-012-SO/TO. The Department has reviewed your submittal and determined that there is insufficient reasonable assurance of compliance with Specific Condition 2.A.5 of the permit. Based on the Department's review, please provide the following information in order to complete the submittal:

### **Updated Closure Cost Estimate, Specific Condition 2.A.5.b**

1. Per Rule 62-701.630(4)(b), Florida Administrative Code (F.A.C.), every fifth year when a permit is issued with a duration greater than 5 years, the owner or operator shall revise the cost estimate. Revisions shall be made by recalculating the total cost of closure or long-term care, in current dollars. Please provide revised cost estimate and associated third-party quotes for all unit costs associated with closure and long-term care of the Facility.

### **Site Plan/Topographic Survey, Specific Conditions 2.A.5.b and 2.A.5.d**

2. Per Specific Conditions 2.A.5.b and 2.A.5.d, please provide updated site plans since site conditions have changed since last submittal including:

Plan Sheet 2 of 3 – Overall Site Plan

- a. Please update plan sheet to include revisions to the monitoring well network, the installation of monitoring well MW-10R2 and the abandonment of monitoring well MW-10.
- b. Please update plan sheet to include revisions to the site life estimate. Updating the site life estimate will require an updated topographic survey.

Plan Sheet 3 of 3 – Final Grading Plan

- c. Please update Plan Sheet 3 of 3 – Final Grading Plan to update Cross Sections A-A and B-B to show the updated approximate existing grade of C&D debris. Updating the approximate existing grade of C&D debris will require an updated topographic survey.
- d. Please update Plan Sheet 3 of 3 – Final Grading Plan to include revisions to the monitoring well network, the installation of monitoring well MW-10R2 and the abandonment of monitoring well MW-10.

**Monitoring Plan Evaluation Report, Specific Condition 2.A.5.e**

The Monitoring Plan Evaluation Report, 5-Year Period 2015 – 2019, prepared by The Colinas Group, Inc., dated June 30, 2020 and submitted on July 1, 2020 was reviewed. The following deficiencies were found:

3. Section 4.0 Interpretation of Groundwater Flow (Page 6): The narrative indicates the general flow direction of the surficial aquifer is from northwest to north across the site. This appears to be an error as the contour maps generally indicate a southeast to northwest or north flow. Please review and revise accordingly.
4. Attachment 1 - Table I – Summary of Detections and Exceedances:
  - a. The sample dates provided in the table do not appear to represent the actual sampling dates. Please revise to include the actual sampling dates.
  - b. Several of the results provided in the table for the parameters of chloride and sodium appear to have been rounded off in comparison to the results previously provided. Please revise table to reflect the results with the same significant digits as provided by the laboratory reports.

Requirements of Rule 62-701.510(8), F.A.C.

5. Rule 62-701.510(8)(b)1., F.A.C.:
  - a. No hydrographs were provided for any of the monitoring wells or piezometers in the monitoring well network. Please revise to include the required hydrographs.
  - b. Tabular displays of any data which shows that a monitoring parameter has been detected: Detections of parameters in groundwater over the period of review (POR) that were not identified in Table 1 of the MPER include: ammonia, chloroform, dissolved oxygen, mercury, nickel, nitrate, nitrite, benzene, specific conductance, toluene and zinc. Please revise the table and update the report narrative accordingly.

6. Rule 62-701.510(8)(b)4., F.A.C., Comparisons between background water quality and the water quality in detection and compliance wells: Although multiple parameters exceeded the groundwater criteria over the POR, only aluminum concentrations were compared between the background well and detections wells. Please revise to include additional comparisons (e.g. parameters with exceedances) of water quality parameters between the background well and detections wells.
7. Rule 62-701.510(8)(b)5., F.A.C., Correlations between related parameters such as total dissolved solids and specific conductance: No correlations between related parameters were provided. Please revise to include these correlations.
8. Rule 62-701.510(8)(b)6., F.A.C.: No discussion of erratic or poorly correlated data, or lack thereof, was provided. Please update the report narrative accordingly.
9. Rule 62-701.510(8)(b)7., F.A.C. – Regarding the evaluation of ground water flow rates:
  - a. Please indicate (cite sources) where the effective porosity used in the flow velocity calculation was obtained from.
  - b. Please indicate the linear distance used in the calculation of horizontal hydraulic gradient.
10. Rule 62-701.510(8)(b)8., F.A.C.: Once comments #5 through #9 and #11 have been addressed, please review the adequacy evaluation of the monitoring program and revise accordingly.

#### Investigative Sampling Evaluation

11. As stated in the Department's Case Closure Letter, dated December 11, 2019 for the Consent Order 18-1495, the Evaluation Monitoring Report due in July 2020 shall be expanded to include data from the January 2018 report (including the investigative sampling evaluation required by Appendix 3, Paragraph 11.a. of Permit #21306-011-SO/MM). The Monitoring Plan Evaluation Report (MPER) by The Colinas Group, Inc. did not include the investigative sampling evaluation. Please revise the MPER to include this investigative monitoring evaluation.
12. Per the Appendix 3, Paragraph 4.c. of above-referenced permit, groundwater "investigative sampling events" shall be conducted quarterly for a minimum of four successive events. To date, four successive quarterly sampling events have not been completed. However, as indicated in the Department's correspondence dated May 9, 2019, the Department is willing to consider data from investigative sampling events conducted on: 3/16/2017, 6/14/2017, 11/29/2017 and 5/18/2018 as the four successive events for the required Investigative Sampling Evaluation.

#### Five-Year Sampling Event

13. As required by Appendix 3, Paragraph 11.b. of Permit #21306-011-SO/MM, the results of the 5-year sampling event required by Appendix 3, Paragraph 4.e. of the referenced permit shall be included in the evaluation that is due by July 1, 2020. The MPER by The Colinas Group, Inc. did not include these results in evaluation of groundwater. Please revise the MPER to include this evaluation.

Mr. Charles W. Teelon  
Sand/Land of Florida Enterprises, Inc.  
October 12, 2020  
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Once the additional information requested above is provided, the Department will determine whether a minor permit modification will be processed administratively to include updates to the permit or if the appropriate permit fee is necessary to process the changes. Please provide a response to this letter within 60 days of the date of this letter.

If you have any questions, please contact me by email at [justin.chamberlain@floridadep.gov](mailto:justin.chamberlain@floridadep.gov) or by phone at (813) 470-5725.

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin A. Chamberlain".

Justin A. Chamberlain, P.G.  
Professional Geologist I  
Permitting and Waste Cleanup Program  
Florida Department of Environmental Protection

cc: Lou Paveglio, Sand/Land of Florida Enterprises, Inc., [sandlandtf@yahoo.com](mailto:sandlandtf@yahoo.com)  
Richard Potts, Jr., P.G., The Colinas Group, Inc., [rickpotts@cfl.rr.com](mailto:rickpotts@cfl.rr.com)  
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