



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

March 5, 2021

John Arnold, P.E., Authorized Representative
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.: 177982-032-SC/T3 & 177982-033-SO/T3

Dear Mr. Arnold:

Thank you for your application for a substantial modification to your construction and operation permits submitted on January 15, 2021 (application fee received February 4, 2021) 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, June 1, 2021, 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.

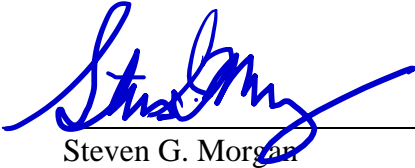
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Your processor will be Justin Chamberlain and can be contacted by phone at (813) 470-5725, or by email at justin.chamberlain@floridadep.gov. Please submit your response by email to SWD_Solid_Waste_Permitting@floridadep.gov, with a copy to justin.chamberlain@floridadep.gov. If the file is very large (greater than 20 Mb), please contact your processor directly to request access to the Department's ftp site.

Sincerely,



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
Eduardo Choquis, P.E., Angelo's Aggregate Materials, Ltd., echoquis@angelosrm.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
Steve Tafuni, DEP Southwest District, steven.tafuni@floridadep.gov
Kate Newsome, DEP Southwest District, kaitlyn.newsome@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 Nos.: 177982-032-SC/T3 & 177982-033-SO/T3

Application to Construct, Operate, Modify, or Close a Solid Waste Management Facility (DEP Form # 62-701.900(1), F.A.C.), dated January 14, 2021 and received January 15, 2021

Substantial Modification Permit Application For The Enterprise Road Class III Recycling And Disposal Facility, dated January 2021

1. **Application Cover Letter:** The facility WACS No. is listed twice and two different WACS numbers are provided. Please remove the second listing and leave the correct the WACS number of 87895.
2. **Cover Page:**
 - a. The facility WACS No. is listed twice and two different WACS numbers are provided. Please remove the second listing and leave the correct the WACS number of 87895.
 - b. The document is not signed or sealed by the Professional Engineer. Please revise to include a signed and sealed copy.
3. **Introduction:**
 - a. The Construction permit number referenced in this section is incorrect. The permit number should be 177982-025-SC/T3. Please revise.
 - b. The narrative indicates the new maximum height will be 295 feet, however, the conceptual closure indicates the maximum height with final cover will be 298 feet. Please review and revise narrative accordingly.

Section 1 - Permit Application FDEP Form # 62-701.900(1), F.A.C. [Rule 62-701.330(3), F.A.C.]

4. **Part A.3.:** With the substantial modification, since the full permit renewal fee was provided, the option exists to also consider these applications as an early renewal of both permits which would extend the duration to a full five years from date of issuance. If applicant wishes to also renew both permits at this time, please revise the application form to check "renewal" as well as "substantial modification" and include the required documentation for renewal (e.g. revised closure cost estimates, all referenced appendices, etc.). These options can be discussed further during the meeting requested at the end of this letter.
5. **Part A.17.:** The expected volume of waste to be received is listed as 2,200 tons per day, however, this volume conflicts with the volume used in Section 3 of the application. Please review and update accordingly.

6. **Part D.13.:** A notice of application is not required for these applications and publication will not be requested. Please update the application form to indicate “N/A” and revise/remove Section 2, D-2, accordingly.
7. **Part S.2.:** The application form has not been signed or sealed by the Professional Engineer. Please revise to include a signed and sealed copy.

Section 2 – Checklist Support, Part D – Solid Waste Management Facility Permit Requirements, General [62-701.320, FAC]

8. **Part D.12.:** The Enforcement Action is not listed for the last two entries, OGC Case numbers 20-0923 and 20-0992. Please update these items to include the enforcement actions. See Comment No. 44, below and verify the enforcement actions are consistent with Section 24.0 of the Operation Plan.

Section 2 – Checklist Support, Part E – Landfill Permit Requirements [62-701.330(3)(a), F.A.C.]

9. **Part E.2.f.:** The response omits Cell 17 from the list of cells that have been approved to accept waste. Please update the response to include Cell 17.
10. **Part E.3.:** The response indicates the topographic survey has been included with the plan set (Section 4), however, a topographic survey was also included in Section 2, Appendix E-2. Please either add a reference to the topographic survey in Appendix E-2 or remove the duplicate topographic map from Section 2, E-2.
11. **Part E.3.a.:** The response to the proposed fill areas does not include Cell 17. Please revise this response accordingly.
12. **Part E.4.a.:** The response indicates population estimates are provided in Section 3.8.3 of the Engineering Report. However, the listed section does not include either current or projected population estimates. Please revise this response and the Engineering Report accordingly.
13. **Part E.4.d.:** The response indicates cover material is sourced from onsite material and has shown to previously comply with “*maximum permeability requirements of 1×10^{-8} cm/sec*”. Please verify if daily, intermediate and/or final cover will comply with the stated maximum permeability requirements of 1×10^{-8} cm/sec and revised the narrative, as appropriate.
14. **Part E.5.:** ENCO Laboratories is listed as the approved laboratories that conduct water quality analyses for the Facility. This section lists ENCO’s Jacksonville and Orlando laboratories as certified under NELAP and that documentation is provided in Section 2, Attachment E-1. However, only documentation for the Orlando laboratory is provided. Please clarify if ENCO’s Jacksonville, FL laboratory is used for this Facility and if so, please provide the documentation of NELAP Certification.
15. **Section 2 – Checklist Support, Part E-2 – Topographic Survey:** See Comment No. 10, above and revise/remove accordingly.

Section 2 – Checklist Support, Part G – Landfill Construction Requirements [62-701.400, F.A.C.]

16. **Part 2.a.:** The response indicates the most recent liner exemption study was submitted in 2016. However, the most recent Liner System Requirements Study Report was dated January 24, 2019 and is also included in Section 2, Part G-2 of this application. Please revise this response accordingly.

Section 2 – Checklist Support, Part I-2 – Slope Stability Analysis [62-701.410(3)(e), F.A.C.]

17. **Page 1, Bulleted Item 3.:** The listed top slope of 3 to 4% is inconsistent with the top slope (2 to 4%) listed on Figures 2 through 11. Please review and revise narrative and/or figures accordingly.
18. **Reference Documents:** Reference No. 5 lists “*Permit Modification – Vertical Expansion, dated September 2020*” by Locklear & Associates, Inc. However, the September 2020 document was a draft of this application that has subsequently been replaced by this application. Please verify that information provided with this application was utilized and revise the reference to reference this application, as appropriate.

Cell 17 Floor Settlement:

19. The section narrative indicates the calculated post-settlement elevations of the cell floor maintains positive drainage from the south towards the leachate collection header (towards the north and northeast). However, some of the cell floor post-settlement elevations show a localized slope away from the collection header towards the south, southeast and southwest. Please provide a discussion regarding the potential of these localized reverse slopes to adversely affect the design of proper leachate collection.
20. Boring B-5 appears to be located outside the footprint of Cell 17 and located within Cell 16. Please indicate how the calculated post-settlement elevation of this boring relates to Cell 17 and revise post-settlement elevations in Tables 3 and 4 as needed.
21. **Table 6 Summary of Cell 3, Cell 4, Cell 7, and Cell 17 Post Settlement Elevations:** Please revise title to: Table 6 Summary of Cell 3, Cell 4, Cell 5, and Cell 17 Post Settlement Elevations.
22. **Figure No. 1 Slope Stability Cross Section Locations:**
- a. Please remove the *future* cell labels from the base map.
 - b. Please rename Permitted Cell 16 to Existing Cell 16.
 - c. Please rename Proposed Cell 17 to Existing Cell 17.
 - d. Please revise the shape of Pond 3 to reflect its actual size and shape.
 - e. Please update the map to remove the 10-foot wide stormwater benches shown at 137 feet and 187 feet.

Section 2 – Checklist Support, Part K – Landfill Operation Requirements [62-701.500, F.A.C.]

23. **Part 2.k.:** The date of the topographic survey conflicts with the date provided elsewhere in the application. Please revise the date of the topographic survey for consistency throughout the application.
24. **Part 2.h.:** The response indicates there are no changes to the gas, leachate or stormwater controls, however, changes to controls have occurred. Please revise the response to indicate the changes to leachate and stormwater controls which have occurred (e.g. size of the berm, elimination of temporary stormwater pond and changes to leachate treatment at Pond 3).

Section 2 – Checklist Support, Part P – Other Closure Procedures [62-701.610, F.A.C.]

25. **Part 1.:** The response refers to Section 7.2 of the Closure and Reclamation Plan for use of closed solid waste disposal facilities. However, there does not appear to be a Section 7.2 in the specified plan. Please review and revise response accordingly.

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

26. **Cover Page:** The document is not signed or sealed by the Professional Engineer. Please revise to include a signed and sealed copy.
27. **Table of Contents:** Appendices 3-D through 3-G appear to have been removed from the Engineering Report. Since this permit application is intended to combine the construction permit and operation permits into a single new permit, all relevant documents should be provided. Please update the appendices to again include Appendix 3-D through Appendix 3-G and update the Table of Contents accordingly.
28. **3.1 General:** This section indicates the report is part of a minor modification application to include the lined leachate aeration associated with Pond 3. Please revise this section to describe this as a renewal and/or substantial modification application and update the reason for the modification to include the vertical expansion.
29. **3.2 Site Location and Description.:** The map presented in Figure 3-1 does not appear to be a quadrangle map from the USGS. Please revise the narrative in this section and in Section 3.4 to remove this wording.
30. **3.3 Surrounding Land Uses and Zoning:**
- a. The narrative indicates Figure 3-2 is an aerial photograph map depicting the surrounding land uses. Figure 3-2 is an aerial map with 1000-foot buffer and Figures 3-2a and 3-2b depict current and future land uses. Please review and update the narrative and/or figures accordingly.
 - b. The narrative indicates Figure S-1 shows the locations of five water wells in proximity to the landfill. However, more than five wells are shown. Please review and update the narrative and/or figures accordingly.

31. **3.4.1 100-Year Flood Prone Areas:** A portion of the site is shown to be within Zone A on Figure S-5. Please explain how this area is not a flood prone area and update the narrative if appropriate.
32. **3.7 Excavation Operations and Cell Construction:** All cell construction has been completed for this facility. Therefore, aside from the last paragraph discussing leachate generation, the narrative of this section seems to no longer be necessary or applicable. Please consider relocating the discussion of leachate to an appropriate section and removing the Excavation Operations and Cell Construction section from the report.
33. **3.8 Method of Cell Sequence:**
- a. The cell indicated that is being filled as of September 2020 conflicts with the cell indicated in Section 8.1 of the Operation Plan. Please review and revise the sections to indicate which cell is currently being filled.
 - b. Procedures for Cell 17 initial waste placement and stormwater diversion were provided to the Department in an email, dated August 10, 2020. Please revise this section narrative to incorporate these procedures, including figures provided and revise the applicable section in Appendix 3-A, Operations Report.
 - c. The section narrative indicates that, “general lift height will be 10 feet”, whereas in other instances throughout the Engineering Report and Operation Report the lift height is listed as 10 to 12 feet. Please update the text to include a consistent lift height throughout the application.
34. **3.10.1.1 Gas Probe Locations, Table 3.10 Gas Probe Installation Schedule:** This table references future cells 9 through 12 which are not part of the permitted footprint and are no longer planned to be permitted. Please revise Table 3.10 accordingly to refer to installation of the wells at closure.
35. **3.10.1.5 Passive Gas Vents:** The narrative indicates a passive gas vent will be placed at the highest point of each cell. As the facility has continued to expand vertically, the relocation of wells locations to top portion of the disposal footprint has reduced the area of the footprint covered by gas vents. Based on the proposed locations of gas vents on drawing C2.00 in the plan set, Cells 1, 2, 7, 15, 16 do not have an associated passive gas vent. Please provide an evaluation of the adequacy of the passive gas vent system to provide adequate gas venting and review drawing and add necessary gas vents to adequately address landfill gas vent spacing over the entire landfill including additional gas vents within the referenced cells.
36. **3.10.2 Leachate Control:**
- a. The section narrative references the “*current permit application*” regarding the discussion of the leachate force main, which was permitted through a previous permit modification. Please revise the narrative accordingly.
 - b. The section narrative references a storage tank that will be used to transfer leachate. Following construction of the force main, it is the Department’s understanding that the storage tank will no longer be used. Please update the narrative accordingly.

37. **3.11 Erosion Control:** Please provide an evaluation that demonstrates that the revised slope configuration [e.g. the removal of side slope benches at elevations 137 and 187 feet NGVD] and design of the stormwater systems will be effective to prevent significant erosion or stability concerns.

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

38. **Cover Page:** The document is not signed or sealed by the Professional Engineer. Please revise to include a signed and sealed copy.

39. **6.1 Fee Schedule:** The fee schedule does not have any quantities or fees listed and therefore does not appear to provide any notable information. Please verify and remove Section 6.1.

40. **8.1 Cell Sequence:** See Comments Nos. 33.a. through 33.c, above and update the narrative as indicated and appropriate.

41. 10.3 Stormwater Control:

- a. The narrative indicates a 6-foot berm will be used to retain and divert stormwater. However, the berm size is listed as 3-feet in other sections of the application. Please revise the narrative to indicate a 3-foot berm will be used.
- b. The narrative discusses the temporary stormwater pond. This discussion appears outdated. Please review narrative and revise accordingly.
- c. The referenced drawing C3.10 does not appear to exist. Please revise narrative to reference C3.01.

42. **19.0 Records, Permits and Reports:** The narrative indicates that an annual topographic survey of the landfill will be performed and kept onsite for reference and inspections. Based on recent non-compliance issues at this facility related to waste height and slope, in order to provide routine verification of height and slope and reasonable assurance to the Department to support approval of this vertical expansion, the annual topographic survey shall be generated from an aerial survey [i.e. not spot elevations] and submitted to the Department annually with the annual estimates of remaining life and capacity. Please revise this section accordingly.

43. **21.0 Final Grade Plan:** The narrative indicates that interim grades of the cells are shown on the plans. However, interim grades are not shown. Please review and revise narrative to remove this statement.

44. **24.0 History of Enforcement Action:** OGC Case Nos. 20-0992 and 20-993 indicate fines were paid. However, an in-kind project was elected. Please update the section narrative accordingly.

45. **Attachment 4 – Gas Monitoring Survey Form:** The form indicates gas probe GP-4 is existing and that gas probe GP-4R is “*To be Installed*”. However, gas probe GP-4 has been abandoned and gas probe GP-4R is existing. Please revise form accordingly.

46. **Attachment 7 – Source-Separated Organics Processing Facility Registration:** The registration is outdated. Please provide the current SOPF registration.

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

47. The plan set is not signed or sealed by the Professional Engineer. Please revise to include signed and sealed copies.

48. **Drawing C1.10 – Overall Landfill Grading and Vertical Expansion Sections:** The drawing indicates top slopes of 2% which appears inconsistent with the percent range of top slopes indicated within Figures 2 through 11 of Section 2, I-2, and narratives within Section 3 and Appendix 3-A. Please review and revise drawing/text accordingly.

49. **Drawing C2.00 – Conceptual Closure:** The spacing, location and number of gas vents do not appear adequate to vent the entire landfill. See Comment No. 35, above. Please review and revise drawing/text to suitably address landfill gas venting.

50. **Drawing C2.10 – Conceptual Closure Sections:** The top of conceptual closure indicates final top slopes of 2% MIN which appears inconsistent with the percent range of top slopes indicated within Figures 2 through 10 of Section 2, I-2, and narratives within Section 3 and Appendix 3-A. Please review and revise drawing/text to indicate 2% MIN and 4% MAX slopes.

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

51. **1. Water Quality Monitoring Plan:** This section references a Table 1 and Figure 1. However, no Table 1 or Figure 1 have been included. Please provide Table 1 and Figure 1.

52. **1.d. Groundwater Monitoring Requirements:** This section references Figure 2 and 3. However, no Figure 2 or Figure 3 have been included. Please provide these figures.

Section 7 – Closure and Reclamation Plan [Rules 62-701.600 & 62-701.620, F.A.C.]

53. **2.7 Reduced Long-term Care Period:** The rule referenced in this section narrative is incorrect. Please revise to reference Rule 62-701.620(3), F.A.C.

Section 7 – Appendix 7-A Financial Assurance Cost Estimates [Rule 62-701.630, F.A.C.]

Closure Cost Estimating Form for Solid Waste Facilities Form # 62-701.900(28), F.A.C.

54. **Part 1. General Information:** The listed remaining life of unit (7 years) is inconsistent with the estimated life remaining from Section 3.8.3. Please review and revise accordingly.

55. **Part 4. Estimated Closing Costs:** See Comment No. 4, above.
- a. If a 5-year renewal is being requested with the substantial modification, please submit revised closure cost estimates, including current third party quotes for all unit costs provided.
 - b. If the application is for a substantial modification without a requested 5-year renewal period, then new third-party quotes do not need to be submitted. However, since the provided cost estimate was calculated by modifying the 2019 revised cost estimate, the calculated closure and long-term care costs will need to be prorated using the 2020 and 2021 inflation factors found on the Department's Solid Waste Financial Assurance website. Please revise this section as necessary based on the comments below and correct the calculated closure and long-term care estimates for inflation as described above. The Department suggests discussing this comment further during the meeting requested at the end of this letter.
56. **Part 4.1. Proposed Monitoring Wells:** No future monitoring wells were indicated in the application. Please review and revise this part as necessary.
57. **Part 4.2. Slope and Fill:** Based on the increase in slide slope area from the proposed vertical expansion, the calculated area used should be updated using 3-D projection based on side slopes and the area adjusted accordingly.
58. **Parts 4.3. Cover Material:** Based on the increase in side slope area from the proposed vertical expansion, the calculated area used should be updated using 3-D projection based on side slopes and the cubic yardage of the Off-site Clay adjusted accordingly.
59. **Part 4.4 Top Soil Cover:** Based on the increase in side slope area from the proposed vertical expansion, the calculated area used should be updated using 3-D projection based on side slopes and the cubic yardage of the Off-Site Material adjusted accordingly.
60. **Parts 4.5. Vegetative Layer:**
- a. The cost per unit of Sodding (\$1.25) is not consistent with the provided estimate (\$1.50). Please revise accordingly.
 - b. Based on the increase in side slope area from the proposed vertical expansion, the calculated area used should be updated using 3-D projection based on side slopes and the acreage of the Hydroseeding adjusted accordingly.
 - c. The third-party quote for irrigation of \$500 appear to be a per acre cost and not a per event cost, please verify and revise this cost as appropriate.
61. **Part 4.7. Passive Gas Control:**
- a. See Comment No. 49, above. Please update number of passive gas vents accordingly.
 - b. The cost per unit for the passive gas vents is based upon outdated linear footage. Please update cost and linear footage based on the new final elevations of the landfill.
62. **Part 4.11 Professional Services:** The cost per hour entries in this section are incomplete due to the PDF formatting. Please revise for legibility.

63. Part 5.5 Leachate Collection/Treatment Systems Maintenance:

- a. Please provide a third-party cost estimate and annual cost for maintaining the leachate treatment system associated with Pond 3 during long-term care or provide alternative costs for off-site disposal.
- b. The cost per unit of cleaning the leachate collection pipe is based on 380 linear feet (Cell 16 only). Please provide a third-party estimate to include cleaning of the entire leachate collection pipe (Cells 16 and 17) and revise this entry accordingly.

64. Part 5.8. Landscape Maintenance: Based on the increase in side slope area from the proposed vertical expansion, the calculated area used should be updated using 3-D projection based on side slopes and the acreage of mowing adjusted accordingly.

65. Part 6. Certification By Engineer: The document is not signed or sealed by the Professional Engineer. Please revise to include a signed and sealed copy.

In order to assist the applicant in completion of the application, the Department feels it would be beneficial to meet to discuss the comments in this letter. The Department therefore requests that the applicant contact us to schedule a meeting prior to submittal of your formal responses to this letter.