



# FLORIDA DEPARTMENT OF Environmental Protection

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Tallahassee, FL 32399-2400

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

April 5, 2021

Mr. Robert Shankle  
Solid Waste Division Manager  
Manatee County Utilities  
3333 Lena Road  
Bradenton, FL 34211  
[robert.shankle@mymanatee.org](mailto:robert.shankle@mymanatee.org)

Re: First Request for Additional Information (RAI)  
Manatee County – Solid Waste  
Facility Name: Manatee County, Lena Road Class I Landfill  
Facility ID: 44795  
DEP Application No.: 0039884-023-SO-MM

Dear Mr. Shankle:

Thank you for your application for a modification to Permit No. 39884-021-SO-01 submitted on March 22, 2021, for the Manatee County Lena Road Class I Landfill. 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 RAI must be signed, sealed, and dated by a registered Florida Professional Engineer.

To continue the processing of your application, the Department must receive a response within 90 days of this letter, 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. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Mr. Shankle  
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Please submit your response by email to [SWPP@dep.state.fl.us](mailto:SWPP@dep.state.fl.us), with a copy to [Philip.Ciaravella@FloridaDEP.gov](mailto:Philip.Ciaravella@FloridaDEP.gov). Please contact me at 850-245-8742 or [Philip.Ciaravella@FloridaDEP.gov](mailto:Philip.Ciaravella@FloridaDEP.gov) if you have any questions regarding this information.

Sincerely,

A handwritten signature in blue ink that reads "Philip Ciaravella". The signature is written in a cursive, flowing style.

Philip Ciaravella  
Environmental Consultant

cc:

Shane Fischer, P.E., SCS Engineers, Inc., [sfischer@scsengineers.com](mailto:sfischer@scsengineers.com)  
Steve Morgan, FDEP Southwest District, [Steve.Morgan@FloridaDEP.gov](mailto:Steve.Morgan@FloridaDEP.gov)  
Elizabeth Kromhout, P.G., FDEP Tallahassee, [Elizabeth.Kromhout@FloridaDEP.gov](mailto:Elizabeth.Kromhout@FloridaDEP.gov)  
Joe Dertien, P.E., FDEP Tallahassee, [Joe.Dertien@FloridaDEP.gov](mailto:Joe.Dertien@FloridaDEP.gov)

Attached: List of Requested Information

**Attachment: List of Requested Information**

Facility Name: Manatee County, Lena Road Class I Landfill  
Site ID: 44795  
DEP Application No.: 0039884-023-SO-MM

Please note the referenced page numbers refer to the electronic document provided, and do not correspond to assigned numbering values found on individual pages.

1. **[PDF p. 53]** Application, Section C.2.c – Yard Trash, p. C-2. Refer to the following statements in the document,

*The County proposes the option to directly dispose of loads of yard trash within the Class I landfill as provided in Section 403.708(12)(c)1, Florida Statutes (FS). As the Lena Road Landfill collects and beneficially uses landfill gas in accordance with Title V Air Operation Permit#0810055-015-AV, it is eligible for the exemption provided in the aforementioned FS.*

Subsection 62-701.300(8)(a)3, F.A.C., references Section 403.708(12)(c) of the Florida Statutes which states,

*A qualifying permitted Class I landfill must obtain a minor permit modification to its operating permit which describes the beneficial use being made of the landfill gas and modifies the facility's operation plan before receiving yard trash as authorized under this subparagraph. The permittee must certify that gas collection and beneficial use will continue after closure of the disposal facility that is accepting yard trash.*

Provide the following:

- a. Description of the landfill gas beneficial use to include at minimum: the recipient end user, gas use, and fraction of gas used for beneficial use versus flared gas.
- b. Statement that gas collection and beneficial use will continue following facility closure.

Regulation reference: Subsection 62-701.300(8)(a)3, F.A.C.

2. **[PDF p. 58]** Application, Section D.12 – History and Description of Enforcement History, p. D-3. Include 4/11/95 Short Form Consent Order which referenced 2/14/95 Warning Letter WL95-0002SW41SWD related to miscellaneous operation matters. Regulation reference: Subsection 62-701.320(7)(i), F.A.C.
3. **[PDF pp. 134 and 180]** Appendix B-Updated Operation Plan, Section K.10.a – Introduction, p. K-38 (track-changes copy) and p. K-28 (no track-changes copy). Clarify the phrases related to Stages I and III,  
*Stage I – 131 acres – filled and inactive*  
*Stage III – 75 acres – partly filled and inactive*

The Department understands that the two stages have received intermediate cover. Confirm for each that either the final elevation has not been achieved or the approved closure plan would allow not requiring final cover after 180 days of achieving the final elevation. Regulation reference: Subsection 62-701.500(7)(h), F.A.C.

4. **[PDF pp. 146 and 190]** Appendix B-Updated Operation Plan, Section K.14.e – Biological Waste, p. K-50 (track-changes copy) and p. K-38 (no track-changes copy). Clarify the phrase related to biomedical waste in the following sentence,

*The landfill may also accept and dispose of dead poultry and hatchery residue. and treated biomedical waste may also be accepted and disposed as waste that is not biomedical provided such waste is in containers clearly labeled as “Treated Biomedical Waste.”*

Regulation reference: Subsection 62-701.520(5)(d), F.A.C.