

May 12, 2021
Project No. 09217088.18

Philip Ciaravella, Environmental Consultant
Florida Department of Environmental Protection - Division of Waste Management
Permitting & Compliance Assistance Program - Solid Waste Permitting
2600 Blair Stone Road, MS 4565
Tallahassee, FL 32399

Subject: Response to Request for Additional Information No. 1
Application for Minor Permit Modification and 5-Year Update Report
Manatee County, Lena Road Landfill, Class I
WACS Facility #44795
Permit #39884-021-SO-01
DEP Application No. 0039884-023-SO-MM

Dear Mr. Ciaravella:

On behalf of the Manatee County Solid Waste Division (County), SCS Engineers (SCS) submits the following responses to the Florida Department of Environmental Protection (FDEP) Request for Additional Information (RAI) No. 1 letter dated April 5, 2021. The letter, sent via email, was directed to Mr. Robert Shankle, Solid Waste Division Manager regarding the Lena Road Class I Landfill Minor Permit Modification and 5-Year Update Report documents dated March 22, 2021.

For ease of review, each FDEP request for information is reiterated in **bold type** followed by SCS's and the County's response.

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 waste.

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.

Response: The Lena Road Landfill has an active landfill gas (LFG) collection system, which collects LFG and transports it to the site's three control devices. These control



devices consist of a sludge dryer, a LFG fired engine generator set (LFGTE) both of which beneficially use the LFG, and a flare which combusts excess LFG. PDF p. 53 Section C.2.c – Yard Trash of the Engineering Report has been revised to include the following information. Refer to Attachment A for revised page C-2. For ease of submittal, the entire Section C Prohibitions has been provided.

- The sludge dryer began using LFG in November 2009 for beneficial use, offsetting the cost of natural gas. The LFG heat input rate to the sludge dryer's furnace shall not exceed 20.4 MMBTU/hour, based on a monthly average as noted in the Title V Air Permit No. 0810055-015-AV.
- The LFGTE plant has a maximum design heat input rating for the engine of 16.38 MMBtu/hr, based on an expected average heating value of the LFG of 456 Btu/scf (LHV) as noted in the Title V Air Permit No. 0810055-015-AV.
- The flare station combusts the LFG that is not used at the sludge dryer or LFGTE when they are operational.

b. Statement that gas collection and beneficial use will continue following facility closure.

Response: Section C.2.c – Yard Trash of the Engineering Report has been revised to include the following information. Refer to Attachment A for revised page C-2. For ease of submittal, the entire Section C Prohibitions has been provided.

- After closure of the landfill the County will continue to collect LFG to control odors and to optimize gas collection for LFG-to-energy uses, of which the County currently has two beneficial use projects. Currently the County does not plan to cease the beneficial use of LFG at a set time in the future. The County will continue to beneficially use LFG as the waste mass ages providing the quantity/quality of gas is available and it is operationally beneficial to the County and end users.

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 WL95-002SW41SWD related to miscellaneous operation matters. Regulation reference: Subsection 62-701.320(7)(i), F.A.C.

Response: As stated on PDF p. 58 Section D.12 – History and Description of Enforcement History of the Engineering Report any errors or omissions were not to be construed as a misrepresentation of the facts. Per discussions with FDEP additional enforcement history was on file with the Department. Section D.12 – History and Description of Enforcement History of the Engineering Report has been revised to include the following. Refer to Attachment B for revised Section D.12. For ease of submittal, the entire Section D Solid Waste Facility Permitting Requirements, General has been provided.

- 4/11/95 Short Form Consent Order which referenced 2/14/95 Warning Letter WL95-002SW41SWD related to miscellaneous operation matters.

3. [PDF p. 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.

Response: Section K.10.a - Introduction of the Updated Operation Plan has been revised to include the following information. Refer to Attachment C for Updated Operation Plan Section K.10.a - Introduction. Note, both a marked-up copy and a clean copy are provided.

- Currently all of the areas within Stages I and III have not been filled to final design dimensions. Waste is currently not being placed within Stages I nor III. Both Stages have received 12 inches of soil and or soil/mulch cover (intermediate cover) in addition to the six-inch initial cover and are vegetated as necessary to reduce slope erosion. As the waste mass within Stages I and III degrades with time and the elevations become more stable, the County may elect to place waste within those areas. Per Rule when those areas have then been filled to design dimensions they shall receive final cover within 180 days after attaining final elevation or in accordance with the Closure Plan.

4. [PDF p. 146 and 190] Application 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.

Response: Per Rule 62-701.520(5)(d), F.A.C. biomedical waste that has been treated may be disposed of as solid waste. The phrase indicated above has been clarified to read the following. Operation Plan, Section K.14.e has been revised to include the following statement. Refer to Attachment D for Section K.14.e Biological Waste. Note, both a marked-up copy and a clean copy are provided.

- Biological waste is generally not accepted. However, carcasses of domestic animals that have died due to disease may be accepted and disposed, provided they are buried at least two feet below the surface of the ground in accordance with 823.041(1), Florida Statutes. Captive wildlife, fish or marine animals, and domestic animals that died from causes other than disease may also be accepted and disposed at least two feet below the surface of the ground and above the water table. The landfill may also accept and dispose of dead poultry and hatchery residue.

Mr. Philip Ciaravella
May 12, 2021
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Sincerely,



Robert B. Curtis, P.E.
Project Director
SCS Engineers



Shane Fischer, P.E.
Vice President/Project Director
SCS Engineers

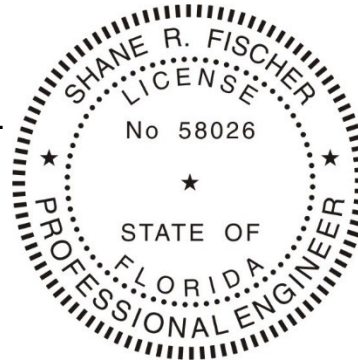
cc: Rob Shankle, Manatee County
Bryan White, Manatee County
El Kromhout, PG, FDEP Tallahassee
Joe Dertien, PE, FDEP Tallahassee
Steven Tafuni, FDEP Southwest District
Kate Newsome, FDEP Southwest District


Attachments

SRF/RBC:srf

This item has been digitally signed and sealed by
Shane R. Fischer, PE on the date adjacent to the seal.

Printed copies of this document are not considered
signed and sealed and the signature must be verified
on any electronic copies.





Attachment A
Section C Prohibitions

SECTION C PROHIBITIONS

There are no proposed changes to the horizontal extents of the disposal areas as part of this Report.

C.1 SITING

The Lena Road Landfill was permitted under the siting criteria of Rule 62-701.300(2), FAC.

C.1.a In Geological Formations or Other Subsurface Features that will not Provide Support for Solid Waste

Per Rule 62-701.300(2)(a), FAC several geotechnical investigations have previously been conducted at the Lena Road Landfill to determine the adequacy of the underlying geologic formations to support the facility. Documentation previously submitted for the geotechnical investigations are on file at the FDEP Southwest District Office.

C.1.b Within 500 Feet of an Existing or Approved Potable Water Well

Per Rule 62-701.300(2)(b), FAC solid waste will not be disposed within 500 feet of an existing or approved potable water well. A potable water well is defined under Rule 62-701.200(86), FAC as any excavation that is drilled or bored, or converted from non-potable water use, when the intended use of such excavation is for the location and acquisition of groundwater which supplies water for human consumption.

C.1.c In a Dewatered Pit

Per Rule 62-701.300(2)(c), FAC solid waste will not be disposed within a dewatered pit.

C.1.d In Any Natural or Artificial Body of Water

Per Rule 62-701.300(2)(d), FAC solid waste is not disposed in any natural or artificial body of water, including groundwater or wetlands within the jurisdiction of the Department.

C.1.e Within 200 Feet of Any Natural or Artificial Body of Water

Per Rule 62-701.300(2)(e), FAC prohibits placing solid waste within 200 feet of any natural or artificial body of water. For purposes of this paragraph a “body of water” includes wetlands within the jurisdiction of the Department, but does not include impoundments or conveyances which are part of an onsite, permitted stormwater management system, or bodies of water contained completely within the property boundaries of the disposal site which do not discharge from the site to surface waters. The Lena Road Landfill does not include the placement of waste within 200 feet of any body of water.

C.1.f On A Right-of-Way of Any Public Highway, Road, or Alley

Per Rule 62-701.300(2)(f), FAC prohibits placing waste in a public right-of-way. The Lena Road Landfill is located entirely on property owned by the County and is not located on any public right-of-way.

C.2 EXEMPTIONS

The Lena Road Landfill is subject to the prohibitions that were in effect at the time the original construction permit was issued as indicated in the general exemptions contained in Rules 62-701.300(12), (13) and (16) through (18), FAC.

C.2.c Yard Trash

Rule 62-701.300(12), FAC applies to yard trash. Currently, loads primarily containing yard waste and tree debris are not directly disposed in the landfill, but are processed in the yard waste processing facility onsite. 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. This option will provide the County more flexibility in managing the incoming loads of yard waste.

The Lena Road Landfill has an active landfill gas (LFG) collection system, which collects LFG and transports it to the site's three control devices. These control devices consist of a sludge dryer, a LFG fired engine generator set (LFGTE) both of which beneficially use the LFG, and a flare which combusts excess LFG.

- The sludge dryer began using LFG in November 2009 for beneficial use, offsetting the cost of natural gas. The LFG heat input rate to the sludge dryer's furnace shall not exceed 20.4 MMBTU/hour, based on a monthly average as noted in the Title V Air Permit No. 0810055-015-AV.
- The LFGTE plant has a maximum design heat input rating for the engine of 16.38 MMBtu/hr, based on an expected average heating value of the LFG of 456 Btu/scf (LHV) as noted in the Title V Air Permit No. 0810055-015-AV.
- The flare station combusts the LFG that is not used at the sludge dryer or LFGTE when they are operational.

After closure of the landfill the County will continue to collect LFG to control odors and to optimize gas collection for LFG-to-energy uses, of which the County currently has two beneficial use projects. Currently the County does not plan to cease the beneficial use of LFG at a set time in the future. The County will continue to beneficially use LFG as the waste mass ages providing the quantity/quality of gas is available and it is operationally beneficial to the County and end users.

The yard waste processing area meets is located inside the slurry wall, so it meets the setback requirements of 62-701.300(2)(b) and (e), FAC, as well as those listed in 62-701.300(12), FAC. Yard waste that has been mixed with Class I waste will be managed as Class I waste and disposed in the Class I landfill.

C.2.d Tanks

No changes are proposed related to tanks. Rule 62-701.300(13), FAC applies to tanks and offsets from wells. Tanks used to treat or store solid waste (leachate) are to be offset at least 500-feet from community water supply systems, or non-transient, non-community water supply system. In addition,

per Rule 62-701.300(13), FAC tanks are to be offset at least 100-feet from other existing potable water supply wells.

C.2.e Indoor Storage

Rule 62-701.300(16), FAC applies to waste stored indoors. This provision does not apply to the Lena Road Landfill; the County does not store waste indoors.

C.2.f Storage in Vehicles or Containers

Rule 62-701.300(17), FAC applies to storage in vehicles or containers. This provision does not apply to the Lena Road Landfill; the County does not store waste in vehicles or containers.

C.2.g Existing Facilities

Rule 62-701.300(18), FAC relates to existing facilities. The Lena Road Landfill was permitted prior to May 27, 2001 and remains subject to the prohibitions that were in effect at the time the construction permit was issued.

C.3 BURNING

Burning of solid waste is not proposed at the Lena Road Landfill in accordance with Rule 62-701.300(3), FAC. The County does not burn waste at the landfill and takes active steps to prevent the burning of waste, including load inspections and stockpiling cover soil to smother any fire that might break out in the in-place waste.

C.4 HAZARDOUS WASTE

Hazardous waste is not knowingly accepted for disposal at the Lena Road Landfill in accordance with Rule 62-701.300(4), FAC.

C.5 PCB DISPOSAL

Polychlorinated biphenyls (PCB's) or liquids containing a PCB concentration of 50 parts per million or greater, or non-liquid PCB's at concentrations of 50 parts per million or greater in the form of contaminated soil, rags, or other debris are not knowingly accepted for disposal in the Lena Road Landfill in accordance with Rule 62-701.300(5), FAC.

C.6 BIOMEDICAL WASTE

In accordance with Rule 62-701.300(6), FAC biomedical wastes are not knowingly accepted for disposal in the Lena Road Landfill.

C.7 CLASS I SURFACE WATER

In accordance with Rule 62-701.300(7), FAC the Lena Road Landfill is not within 3,000 feet of a Class I surface water.

C.8 SPECIAL WASTE

Per Rule 62-701.300(8) FAC, special wastes will not be accepted for disposal within the Lena Road Landfill. Special wastes include lead-acid batteries, used oil, yard trash, white goods, and whole waste tires.

C.9 LIQUIDS

Liquid wastes will be handled in accordance with FDEP Rule 62-701.300(10), FAC. Per Rule 62-701.300(10)(a) noncontainerized liquid waste will not be placed in the Lena Road Landfill unless the waste is household waste other than septic waste. Containers holding liquid waste will not be placed in the landfill unless per Rule 62-701.300(10)(b) the container is small, similar in size to that normally found in household waste, the container is designed to hold liquids for use other than storage; or the waste is household waste. Containers or tanks twenty gallons or larger in capacity shall either have one end removed or cut open, or have a series of punctures around the bottom to ensure the container is empty and free of residue and the empty container or tank shall be compacted to its smallest practical volume for disposal.

C.10 USED OIL


Per Rule 62-701.300(11), FAC used oil, either commingled or mixed with solid waste, will not be accepted for disposal within the Lena Road Landfill. Used oil will also not be directly disposed within the landfill. Only oily wastes, sorbents, or other materials used for maintenance or to clean up or contain leaks, spills, or accidental releases of oil may be disposed in the landfill.

C.11 CCA TREATED WOOD

In accordance with Rule 62-701.300(14), FAC, Chromated Copper Arsenate (CCA) / Pressured Treated (PT) wood will not be incorporated into compost or made into mulch, decorative landscape chips, or any other wood product that is applied as a ground cover, soil, or soil amendment. CCA wood waste materials shall be routed to the Class I disposal area. CCA wood waste that is co-mingled with other types of waste shall be sorted to remove the CCA waste if possible, if not, the entire load will be routed to the Class I disposal area.

C.12 DUST CONTROL RESTRICTIONS

In accordance with Rule 62-701.300(15), FAC, the owner or operator of the Lena Road Landfill will not allow the unconfined emissions of particulate matter in violation of Paragraph 62-296.320(4)(c), FAC.



Attachment B
Section D Solid Waste Facility Permitting Requirements, General

SECTION D

SOLID WASTE FACILITY PERMITTING REQUIREMENTS, GENERAL

D.1 APPLICATION FORM AND SUPPORTING DOCUMENTS

Rule 62-701.320(5)(a), FAC, requires one electronic copy of the application, engineering plans and reports, and supporting information. One complete dated and signed electronic application Form 62-701.900(1) and other supporting documents is included at the beginning of this Report.

D.2 ENGINEERING CERTIFICATION

This Report has been signed and sealed by Shane R. Fischer, PE, a Licensed Professional Engineer in the State of Florida (License No. 58026).

D.3 TRANSMITTAL LETTER

A transmittal letter is included at the beginning of this Report and Application as required by Rule 62-701.320(7)(a), FAC.

D.4 APPLICATION FORM

Part S of the State of Florida Department of Environmental Protection Application for a Permit to Construct, Operate, Modify or Close a Solid Waste Management Facility Application Form 62-701.900(1), effective date of February 15, 2015, has been signed and sealed by Shane R. Fischer, PE, a licensed Professional Engineer in the State of Florida (License No. 58026) as required by Rule 62-701.320(7)(b), FAC and is attached at the beginning of this Report. In addition, the Form has been signed and dated by Robert Shankle, Solid Waste Division Manager.

D.5 PERMIT FEE

Enclosed with this application is a check in the amount of \$10,250.00 made payable to Florida Department of Environmental Protection. The check includes \$10,000.00 for the 20-year payment installment in accordance with Permit 39884-021-SO-01 Specific Condition A.6. and the fee schedule listed in Rule 62-701.315(13), FAC. Additionally, a permit application fee of \$250 is included, in accordance with Rule 62-4.050(4)(s)5, FAC, to address the request for a minor permit modification.

D.6 ENGINEERING REPORT

This Report is submitted in the format specified by 62-701.320(7)(d), FAC and meets the requirements of an Engineering Report.

D.7 OPERATION PLAN AND CLOSURE PLAN

Per Rule 62-701.320(7)(e)1, FAC please refer to the Operation Plan in Appendix B which has been updated as required. The updates include the option to directly dispose of yard waste within the Class I Landfill, an updated description of the stormwater management system, and minor administrative modifications to better align with current site conditions. Additionally, the Household Hazardous Waste (HHW) Operation Plan has been updated in Appendix B.

Note, both a mark-up copy and clean copy of the Operation Plan are provided. The mark-up copy indicates changes as ~~cross-out~~ for deletions and underline for additions to the previously-approved *Operations Plan*, dated September 2017, prepared by SCS. The clean copy is created by accepting all deletions and additions. The attachments to the Operation Plan have been included in the clean copy only. Lena Road Landfill's Operation Plan is considered a working document. As manpower, equipment, or work environment changes the Operation Plan will be updated to reflect the new conditions as needed.

Please refer to Section O for updates to the Closure Plan. Updated Waste Filling Sequence Drawings are provided in Appendix C.

D.8 CONTINGENCY PLAN

Per Rule 62-701.320(7)(e)2, FAC an updated Contingency Plan is incorporated within the Operation Plan located in Appendix B. The updates are minor administrative modifications to better align with current site conditions. Note that both a mark-up copy and a clean copy of the Contingency Plan are provided. The mark-up copy indicates changes as ~~cross-out~~ for deletions and underline for additions to the previously-approved Contingency Plan. The clean copy is created by accepting all deletions and additions.

D.9 DRAWINGS

Refer to Appendix C for the updated Operation Drawings detailing proposed modifications to the landfill terraces and bottom swale in areas yet to be filled and constructed. Specifically, the swale at the toe of slope will be constructed with a larger cross-section for improved stormwater flow. 30-ft wide terraces are currently permitted at elevations 60, 80, 95 and 105-ft NGVD29. Within the application for permit renewal, dated November 2009, the terraces were 20-feet wide at elevations 55, 75, 95 and 110-ft NGVD. The County proposes to return the terraces back to widths and elevations shown the Plans approved in 2009 for landfill slopes yet to be constructed. This modification will allow for more waste airspace within the permitted footprint, while providing adequate stability (see Appendix E) and sufficient room for the secondary stormwater management system (see Appendix F).

D.9.a Regional Map or Plan

Per Rule 62-701.320(7)(f), FAC the Lena Road Landfill location was previously submitted with the *Lena Road Landfill Operation Permit Renewal Application*, dated October 17, 2015, prepared by Atkins North America, Inc. and is on file with the Department.

D.9.b Vicinity Map or Aerial Photograph

An aerial photograph, dated January 28, 2020, is included on Sheet 02 of Appendix C.

D.9.c Site Plan

Sheet 03 of the Operation Drawings in Appendix C depicts the limits of the property owned by the County. As referenced in the aforementioned October 27, 2015 permit renewal application, a boundary survey was submitted to FDEP within the 2010 permit renewal application within Tab D. The property boundary for the facility remains unchanged and is not expected to change as a result of this Report.

D.9.d Supporting Details

Engineering details necessary to support this Report are shown in Appendix C. The elevations shown on the Drawings are based on the National Geodetic Vertical Datum 1929 (NGVD29) and any horizontal coordinates shown are referenced to the West Zone of the Florida State Plane Coordinate System, North American Datum (NAD) 1983, 1990 adjustment.

D.10 PROOF OF PROPERTY OWNERSHIP

Ownership of the Lena Road Landfill is not expected to change as a result of this Report.

D.11 WASTE REDUCTION AND RECYCLING GOALS

Manatee County has worked to advance waste reduction and recycling efforts over the years. Based on the most recent FDEP reporting for Calendar Year 2019, the County achieved an unadjusted recycling rate of 62% and an adjusted recycling rate of 63%. The latter rate places the County in 7th place among Florida's 67 counties.

D.12 HISTORY AND DESCRIPTION OF ENFORCEMENT HISTORY

Below is a summary of enforcement history for the applicant for the Lena Road Landfill. Any errors or omissions are not to be construed as a misrepresentation of the facts. Should FDEP have additional information in their files, the County will defer to FDEP's data.

- [4/11/95 Short Form Consent Order which referenced 2/14/95 Warning Letter WL95-002SW41SWD related to miscellaneous operation matters.](#)
- On July 9, 2020, the County and FDEP executed a short form consent order (OGC File No 20-1009) related to its Title V Permit and resulting in a fine of \$1,000 for civil penalties and FDEP costs and expenses. The order was initiated upon review of the facility NSPS report for the 2nd Semi-annual monitoring period of 2019 and finding that oxygen exceedances were not addressed in accordance with the timeline required in 60.755(a)(5) of the Code of Federal Regulations. Oxygen levels are back in compliance and it is understood that FDEP is satisfied with the County's response to this situation.

D.13 PROOF OF PUBLICATION OF NOTICE OF APPLICATION

No alterations are proposed to the horizontal or vertical extents of the disposal area, nor any substantial modifications, as a result of this Report. Therefore, a Notice of Application is not required.

D.14 AIRPORT SAFETY REQUIREMENTS

Based on project files and the County's knowledge of the area, there are no licensed and operating airport runways within a five-mile radius of the Lena Road Landfill. This information was supplied to the Department as Figure D-1 within the October 27, 2015 application for permit renewal, prepared by Atkins North American, Inc. As there are no proposed alterations to the horizontal or vertical extents of the disposal area, information required by subsection 62-701.320(13), FAC, is not included as part of this Report.


D.15 OPERATOR AND SPOTTER TRAINING REQUIREMENTS

No changes are proposed to the training program through this Report and no changes were required as a result of COVID. In accordance with Rule 62-701.320(15), FAC key supervisory staff at the Lena Road Landfill have received Landfill Operator Certification Training. As required by Rule 62-701.320(15), FAC a trained operator will be onsite at all times when waste is received at the Lena Road Landfill and a trained spotter will be onsite during all times when solid waste is deposited at the working face. In addition, equipment operators shall have sufficient training and knowledge to move waste and soil and to develop the site in accordance with the design and operational standards described in this Report. Records of all training for operators and spotters (course completions and certifications obtained) are kept at the Lena Road Landfill and are available for Department inspection.

In order to be considered trained; Operators of the Lena Road Landfill shall complete 24 hours of initial training, and shall pass an examination as part of that training. Within three years after passing the examination, and every three years thereafter, operators shall complete an additional 16 hours of continued training.

In order to be considered trained; spotters shall complete 8 hours of initial training. Within three years after attending the initial training, and every three years thereafter, spotters shall complete an additional 4 hours of continued training.

Operator and spotter training courses will be attended as offered by the University of Florida Center for Training, Research and Education for Environmental Occupations (TREEO) and through other FDEP approved sources. Copies of updated training records have been included in Appendix B.



Attachment C
Updated Operation Plan Section K.10.a - Introduction

This task typically takes between two and three days to perform, depending on the number of valve setting adjustments. A site map displaying the locations of the landfill gas collection wells is included as Attachment K-1.

K.10 STORM WATER MANAGEMENT

K.10.a Introduction

The purpose of this Storm Water Management Plan (SWMP) is to describe the system, operation and maintenance of the Storm Water Management System (SWMS) for the Lena Road Landfill.

The Manatee County Lena Road Landfill is located in Bradenton Florida on approximately 1,200 acres owned by Manatee County. 316 acres are designated for landfill. The rest of the property is used for wetlands mitigation, buffer, administration facilities, storm water management and the Manatee County regional wastewater treatment plant.

The Lena Road Landfill is divided into three stages which are listed below with the acreage and status for each stage:

- Stage I – 131 acres – partly filled and inactive
- Stage II – 110 acres – partly filled and active
- Stage III – 75 acres – partly filled and inactive

Figure K-11 is a site map of the Lena Road Landfill Storm Water Management System. The map shows the landfill stages, storm water swales, storm water pond and outfall structures. The landfill waste areas have a storm water drainage system. The details for the drainage system on the Stage I, II and III Landfills are shown on the Fill Sequence Plan drawings.

Currently all of the areas within Stages I and III have not been filled to final design dimensions. Waste is currently not being placed within Stages I nor III. Both Stages have received 12 inches of soil and or soil/mulch cover (intermediate cover) in addition to the six-inch initial cover and are vegetated as necessary to reduce slope erosion. As the waste mass within Stages I and III degrades with time and the elevations become more stable, the County may elect to place waste within those areas. Per Rule when those areas have then been filled to design dimensions they shall receive final cover within 180 days after attaining final elevation or in accordance with the Closure Plan.

K.10.b Storm Water Management System overview

The purpose of the storm water management system is to collect clean storm water run-off from the landfill in terrace swales located on the landfill side slopes and convey the storm water to the detention areas for treatment and disposal to Cypress Strand Creek or Gates Creek. Any storm water that comes in contact with solid waste or is contaminated by leachate makes the storm water leachate, and requires discharge of the storm water to the leachate collection system for treatment at the wastewater treatment plant.

This task typically takes between two and three days to perform, depending on the number of valve setting adjustments. A site map displaying the locations of the landfill gas collection wells is included as Attachment K-1.

K.10 STORM WATER MANAGEMENT

K.10.a Introduction

The purpose of this Storm Water Management Plan (SWMP) is to describe the system, operation and maintenance of the Storm Water Management System (SWMS) for the Lena Road Landfill.

The Manatee County Lena Road Landfill is located in Bradenton Florida on approximately 1,200 acres owned by Manatee County. 316 acres are designated for landfill. The rest of the property is used for wetlands mitigation, buffer, administration facilities, storm water management and the Manatee County regional wastewater treatment plant.

The Lena Road Landfill is divided into three stages which are listed below with the acreage and status for each stage:

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Figure K-11 is a site map of the Lena Road Landfill Storm Water Management System. The map shows the landfill stages, storm water swales, storm water pond and outfall structures. The landfill waste areas have a storm water drainage system. The details for the drainage system on the Stage I, II and III Landfills are shown on the Fill Sequence Plan drawings.

Currently all of the areas within Stages I and III have not been filled to final design dimensions. Waste is currently not being placed within Stages I nor III. Both Stages have received 12 inches of soil and or soil/mulch cover (intermediate cover) in addition to the six-inch initial cover and are vegetated as necessary to reduce slope erosion. As the waste mass within Stages I and III degrades with time and the elevations become more stable, the County may elect to place waste within those areas. Per Rule when those areas have then been filled to design dimensions they shall receive final cover within 180 days after attaining final elevation or in accordance with the Closure Plan.

K.10.b Storm Water Management System overview

The purpose of the storm water management system is to collect clean storm water run-off from the landfill in terrace swales located on the landfill side slopes and convey the storm water to the detention areas for treatment and disposal to Cypress Strand Creek or Gates Creek. Any storm water that comes in contact with solid waste or is contaminated by leachate makes the storm water leachate, and requires discharge of the storm water to the leachate collection system for treatment at the wastewater treatment plant.

Attachment D
Section K.14.e Biological Waste

K.13.d Archiving and Retrieving Records

All records pertaining to the operation of the facility will be retained throughout the design life of the landfill. All monitoring records, calibration and maintenance records and reports required by the landfill operation permit will be retained for at least ten years. Records may be archived after five years provided they can be retrieved within seven days.

K.14 SPECIAL WASTE HANDLING

K.14.a Motor Vehicles

Motor vehicles are not presently accepted for disposal or temporary storage at the Lena Road Landfill.

K.14.b Shredded Waste

Shredded municipal waste is not accepted for disposal at the Lend Road Landfill. Shredded tires may be accepted if not recycled.

K.14.c Asbestos

Asbestos containing materials from sources covered under the National Emission Standards for Asbestos, 40 CFR Part 61, Subpart M are accepted at the Lena Road Landfill, with prior approval of the County. These materials will be placed in the landfill by appointment only, covered with a minimum of one foot of non-asbestos containing material, and the location will be recorded in accordance with 40 CFR Part 61.154. A record of the location of asbestos-containing waste will be maintained.

K.14.d Contaminated Soil

Soils contaminated with non-hazardous waste and petroleum-contaminated soil, which has been treated pursuant to Chapter 62-713, F.A.C., will be accepted at the discretion of the County.

K.14.e Biological Waste

Biological waste is generally not accepted. However, carcasses of domestic animals that have died due to disease may be accepted and disposed, provided they are buried at least two feet below the surface of the ground in accordance with 823.041(1), Florida Statutes. Captive wildlife, fish or marine animals, and domestic animals that died from causes other than disease may also be accepted and disposed at least two feet below the surface of the ground and above the water table.

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."

K.14.e Biological Waste

Biological waste is generally not accepted. However, carcasses of domestic animals that have died due to disease may be accepted and disposed, provided they are buried at least two feet below the surface of the ground in accordance with 823.041(1), Florida Statutes. Captive wildlife, fish or marine animals, and domestic animals that died from causes other than disease may also be accepted and disposed at least two feet below the surface of the ground and above the water table.

The landfill may also accept and dispose of dead poultry and hatchery residue.

K.14.f Oily Waste

Materials as defined in Chapter 62-701.300 (11)(b), F.A.C., may be accepted for disposal at the discretion of the County.