



Florida Department of Environmental Protection

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Mr. Leonard Marion
Volusia County Solid Waste Department
3151 East State Road 44
Deland, FL 32724

OCD-SW-08-0552

Volusia County – SW
Tomoka Farms Road Landfill – Class I
Leachate Management System – Minor Modification
Modification of Permit No.SO64-0078767-023
Permit Application No.SO64-0078767-025
Second Request for Additional Information

Dear Mr. Marion:

The additional information dated October 1, 2008 and received on October 3, 2008 was reviewed. The items listed on the attached page remain incomplete. Evaluation of your application will continue to be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact George Cheryan at (407) 893-3328 or by e-mail at George.cheryan@dep.state.fl.us.

Sincerely,

F. Thomas Lubozynski, P.E.
Waste Program Administrator

Date: October 29, 2008

FTL/gc/ew

Enclosure

cc:

Jennifer Stirk, Volusia County, jistirk@co.volusia.fl.us
Samuel B. Levin, P.E. - S2L, Inc. slevin@s2li.com
Ali Kazi, P.E - FDEP Industrial Waste Permitting Section ali.kazi@dep.state.fl.us

Note that all references to "Report" in the following text refer to the document entitled, "Application for a Minor Modification of a Class I Operations Permit Tomoka Farms Road Landfill, Volusia County, Florida, Response to RAI dated September 4, 2008", Prepared by: S2L, Incorporated, 531 Versailles Drive, Suite 202, Maitland, FL 32751 dated October 2008.

1. **Attachment 1, "Report of Geotechnical Subsurface Exploration and Evaluation Tomoka Landfill Proposed Leachate Treatment Plant"**, Section at end of the report titled "Recommended Groundwater Monitoring Plan Volusia County Tomoka Farms Road SWMF Sod Farm Sprayfield":
 - a. On page 4 the recommendation is made that groundwater sampling at the Sod Farm Sprayfield should become part of the landfill's Monitoring Plan Implementation Schedule (MPIS). The Sod Farm Sprayfield is far enough away from the landfill that the Solid Waste MPIS will not need to be modified. All permitting of the Sod Farm Sprayfield for the leachate treatment system including the Ground Water Monitoring Plan specific for that site will be permitted under the Department's Industrial Waste Section.
 - b. If the Primary Sprayfield site had been chosen, it may have required changes to the MPIS. However, the alternate sprayfield site has been chosen and it is far enough away from the landfill that the Solid Waste MPIS will not need to be modified.
2. **Attachment 2, Revised Operation Plan:**
 - a. The response to Comment No. 2 from First RAI dated September 4, 2008 is incomplete. The revised operations plan included as Attachment 2 does not include Section Numbers.
 - I. Are Section Numbers depicted in the Table 1-1, Column 2 titled "Corresponding Section/Page No. of Operation Plan"? If so, the Section Numbers need to be used throughout the Operation Plan. Or, are the entries in that column supposed to be page numbers? If so, the entries should have the same format as the page numbers (for example, 2-12 not 2.12).
 - II. Table 1-1 lists Section 7.5. Is this the page number? If so then pages 7-4 and 7-5 in the Operation Plan are missing. Clarify the discrepancy.
 - III. The rule references cited for Rule 62-701.500(7)f thru j in Table 1-1, Page 1-2, Section 7 are incorrect. For example, procedures for applying intermediate cover should be 62-701.500(7)f and not (7)g. Please correct the rule references in Table 1-1.
 - IV. Table 1-1, page 1-4, Section 12, Rule reference 62-701.500(12)a and b are missing.
 - b. The response to Comment No. 4 from First RAI dated September 4, 2008 is incorrect. The correct telephone number for the Solid Waste Section is 407-893-3328. Please make the necessary correction in the table listed on Page 2-3 thru 2-4 of the revised operation plan.
 - c. The hours of operation for the landfill are not listed. Please provide them.
 - d. The Operation Plan does not describe how spotters are used. Are they on the ground or on equipment? When they observe unauthorized waste, what actions are taken to remove the waste from the working face?
 - e. Page 7-1, Initial/Daily Cover. The Operation Plan should describe the specific daily and initial cover being used at this facility. Will the facility use Recovered Screened Material (RSM)? If so, indicate where and how it would be used.

- f. Page 13-1, Remaining Life and Capacity Estimate. The Operation Plan states the estimate or remaining capacity will be submitted as part of the closure and long-term care cost estimates. We prefer the two documents be submitted as separate documents. This will make it easier to file them correctly in Oculus.
- g. Please provide a new revision of the Operations Plan with the appropriate changes.

The Solid Waste Program is permitting those aspects of the leachate management system which affect or are part of the landfill operations. The treatment system and disposal of treated leachate is being permitted by the Industrial Waste Permitting Section in the Water Facilities Program. That permit application is FLA011114.

There was a cover letter dated August 12, 2008 for the original solid waste application submittal. The submittal was signed and sealed August 8, 2008; it was received August 11, 2008. The cover letter mentioned five proposed modifications that were part of the minor modification application for the current solid waste permit. Those modifications are quoted below with clarification regarding the FDEP solid waste and industrial waste program jurisdictions identified:

1) The County is requesting that FDEP allow for piping modifications to the existing Class I disposal facility's leachate collection system in order to direct collected leachate to the proposed leachate treatment system as shown on Figure 4-2 (Attachment A, Section 3, sub-section 4). The leachate is currently directed to the storage ponds, which we plan to use only on an emergency basis in the event that the plant treatment capacity is exceeded, or when the capacity to accommodate treated effluent is exceeded within the spray fields, in conjunction with dust control and sideslope irrigation. This will be addressed in the Solid Waste permit.

2) The County is requesting FDEP approval for the construction of a Sequencing Batch Reactor (SBR) in order to treat leachate generated on site as well as leachate from the WVTS. A full discussion of the proposed treatment system is included in Sections 3 and 4 of the "Preliminary Design Report for the Volusia County Tomoka Farms Road Landfill Leachate Treatment Facility" (Attachment A). The location and a plan view of the proposed SBR are included on Figures 4-2 and 4-3, respectively (Attachment A, Preliminary Design Report, Section 4). This will not be permitted by the Solid Waste Program. It will be addressed by the Industrial Waste Permitting Section in Permit No. FLA 011114.

3) The County is requesting FDEP approval for on-site utilization/disposal of effluent from the proposed leachate treatment facility. Proposed are a primary and secondary spray field for spray irrigation, in conjunction with site-wide dust control, and/or side slope irrigation. Note that monitoring wells will be required to monitor the primary and alternate spray fields, and that the hydrogeological information necessary to design these wells is not yet available. A proposal to modify the current MPIS to include these additional monitoring locations shall be submitted to the Department for review shortly after this data becomes available. This will not be permitted by the Solid Waste Program. It will be addressed by the Industrial Waste Permitting Section in Permit No. FLA 011114.

The MPIS for the solid waste disposal facility does not have to be modified because the utilization/disposal of the effluent for the proposed leachate treatment facility is outside the footprint of the solid waste monitoring wells and solid waste disposal area.

4) The County is proposing to dewater the sludge produced during leachate treatment in drying beds to a minimum of 12% solids and subsequently disposing the dried sludge in the TFRL.

The treatment of the sludge (sludge processing) will be part of the industrial wastewater permit. However, the disposal of the dried sludge will be addressed in the Solid Waste permit.

5) The County is proposing to modify the currently permitted Operation Plan in order to address the changing operational requirements that will be implemented once the County has received FDEP approval and subsequently constructed the proposed leachate treatment system.

The Operation Plan for the disposal facility will be addressed in the Solid Waste permit. A separate Operation Plan may be necessary for the Industrial Waste permit.