



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

Shawn Hamilton
Secretary

REQUEST FOR ADDITIONAL INFORMATION

May 5, 2022

John Arnold, Authorized Representative
Angelo's Aggregate Materials, Ltd.
855 28th Street South
St. Petersburg, Florida 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 Lined Cell 1 (Cell 1L)
Facility ID: 87895
DEP Application Nos.: 419039-001-SC/T3 & 419039-002-SO/T3

Dear Mr. Arnold:

Thank you for your application for construction/operation of a new, lined Class III landfill submitted on April 3, 2022 (application fees received April 5, 2022 and April 6, 2022) 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 Engineer.

To continue the processing of your application, the Department must receive a response within 90 days of this letter, August 3, 2022, 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.) 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.

Your processor will be Emily Wargo and can be contacted at Emily.Wargo@FloridaDEP.gov, (813) 470-5942. Please submit your response by email to SWD_Solid_Waste_Permitting@FloridaDEP.gov, with a copy to Emily.Wargo@FloridaDEP.gov. If the submittal is very large, please contact the processor to assist you with posting it to a folder on this office's ftp site.

Angelo's Aggregate Materials, Ltd.

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May 5, 2022

Sincerely,



Melissa Madden
Air & Solid Waste Permitting Manager
Permitting and Waste Cleanup Program
Southwest District

cc:

Lisa Baker, P.E., Locklear & Associates, Inc., lisa@locklearconsulting.com

John Locklear, P.G., Locklear & Associates, Inc., john@locklearconsulting.com

Augustin Moreno, Angelo's Aggregate Materials, Ltd., amoreno@angelosrm.com

Melissa Madden, FDEP Southwest District, Melissa.Madden@FloridaDEP.gov

Emily Wargo, FDEP Southwest District, Emily.Wargo@FloridaDEP.gov

Justin Chamberlain, P.G., FDEP Southwest District, Justin.Chamberlain@FloridaDEP.gov

Clint Kromhout, P.G., Florida Geological Survey, Clint.Kromhout@FloridaDEP.gov

Southwest District Solid Waste Compliance Section, SWD_Waste@FloridaDEP.gov

Attached: List of Requested Information

Attachment: List of Requested Information

Angelo's Aggregate Materials, Ltd.
Facility Name: Enterprise Road Class III Recycling and Disposal Facility Lined Cell 1 (Cell 1L)
Facility ID: 87895
DEP Application No.: 419039-001-SC/T3 & 419039-002-SO/T3

Permit Application to Construct and Operate Proposed Lined Cell 1 (Cell 1L) – Enterprise Road Class III Recycling and Disposal Facility, prepared by Locklear & Associates, Inc., dated March 31, 2022 and received April 3, 2022 (application fees received April 5, 2022 and April 6, 2022)

The Department has reviewed the above referenced permit application, and the following comments are provided to assist the applicant in finalizing the permit application. Prior to submitting a formal response to this RAI, it is requested that the applicant schedules a meeting to discuss the comments below.

INTRODUCTION AND APPLICATION – FDEP FORM 62-701.900(1), F.A.C. (62-701 F.A.C.)

1. The application form should be updated, as appropriate, based on changes made in the response to this RAI.
2. **Part D.13 – Notice of Application.** In accordance with Rule 62-701.320(8), F.A.C., please publish the attached Notice of Application and provide Proof of Publication to the Department. In addition, please provide documentation that the Notice of Application has been sent to the officials described in Rule 62-701.320(8)(b), F.A.C.

PART C – PROHIBITIONS (62-701.300, F.A.C.)

3. **Siting Criteria, Section 1.e.** A review of the National Wetlands Inventory in Map Direct indicates a wetland may exist within 200 feet of the proposed Cell 1L. Please provide documentation on how this was evaluated and/or mitigated to ensure that the prohibition will not be violated by siting this facility.
4. **Section 2 – Exemptions.** Please revise Part C to address Rule 62-701.300(14), F.A.C. and revise the Operations Plan to address the management of CCA treated wood (i.e., whether CCA treated wood will be accepted for disposal by the facility and, if not, procedures for identifying and removing CCA treated wood from the incoming waste stream).
5. **Section 3 – Burning Restrictions.** Please revise this section to include a reference to the part of the application that supports that open burning will not occur at the landfill (e.g., Operations Plan reference).
6. **Section 7 – Class I Surface Water Restrictions.** This section references Part F, Figure F.1., however this figure does not appear to identify Class I surface waters. Please provide documentation supporting the statement that the landfill is not within 3,000 feet of a Class I surface water.
7. **Section 8 – Special Waste for Landfills Restrictions.** This section includes yard waste in the list of special wastes that the facility will not knowingly accept, however a note is included stating that the facility will accept Class III wastes defined in Rule 62-701.200(14), F.A.C. Please revise this section to include separate lists for special wastes that the facility will not accept (e.g., lead-acid batteries, used oil, white goods, whole waste tires) and special wastes that the facility will accept with justification for accepting those wastes (e.g., yard waste is included in the definition of Class III

waste per Rule 62-701.200(14), F.A.C., therefore as a Class III landfill the facility may accept yard waste for disposal).

PART D – SOLID WASTE MANAGEMENT FACILITY PERMIT REQUIREMENTS, GENERAL (62-701.320, F.A.C.)

8. **Section 9 – Plans or Drawings.** This section indicates that a signed and sealed topographic survey is included in the Drawings in Appendix B. The boundary and topographic survey provided in Appendix B (Sheet C3.00) is signed and sealed by Ms. Lisa Baker, P.E. and not by a Florida licensed professional surveyor and mapper in accordance with Rule 62-701.320(7)(f)5., F.A.C. Please provide the boundary and topographic survey signed and sealed by a professional surveyor.
9. **Attachment D.10 - Property Owner Documentation.**
 - a. The parcels on the Sketch and Description by Simmons & Beall, Inc. dated February 3, 2017, does not appear to match the current parcel boundaries as identified from the Pasco County Property Appraiser. Please review and revise to include current property boundaries.
 - b. The property appraiser parcel information provided included parcel data for the active Class III landfill (parcels 08-25-22-0000-00100-0110 and 05-25-22-0000-00500-0031), however only parcels 06-25-22-0000-00300-0010 and 05-25-22-0000-00500-0000 were identified on the Sketch and Description map. Please revise D.10 to include only the parcel data associated with the properties that the applicant is considering the whole site.
 - c. Based on the parcels identified by the applicant to be considered the whole site, the property boundaries on all figures and drawings associated with the application should be reviewed for consistency and revised accordingly.

PART E – LANDFILL PERMIT REQUIREMENTS (62-701.330, F.A.C.)

10. **Section 3 – Topographic Maps.** This section references the Operations Plan narrative in response to cross sections of lifts. No cross sections of lifts are provided in the Drawings in Appendix B. In accordance with Rule 62-701.330(3)(c), F.A.C., please revise Appendix B to include lift cross sections and update the narrative of this section accordingly to reference the lift cross sections.

PART F – GENERAL CRITERIA FOR LANDFILLS (62-701.340, F.A.C.)

11. **Figure F.1 – FEMA Flood Map.** The property boundary for the site is not consistent with the property boundary provided in other parts of the application. Please review and revise accordingly.

PART G – LANDFILL CONSTRUCTION REQUIREMENTS (62-701.400, F.A.C.)

12. The introductory paragraph of Part G references Rule 62-701.730, F.A.C., which is the Rule associated with construction and demolition debris disposal and recycling facilities. Please review the Rules referenced in this paragraph and revise as necessary to list the Rules applicable to the design and construction of a Class III landfill.
13. The narrative of Part G includes numerous generic references to the technical specifications contained in Appendix A (e.g., “the specifications in Appendix A detail the requirements” and “...details on testing are included in the Geomembrane specification...,” etc.). Please revise this narrative to include specific and detailed references to the part of the technical specification section where the subject information can be found (e.g., Technical Specification Section 31 91 13 –

Geomembrane, Part 1.9).

14. Section 2 – Landfill Liner Requirements

a. Section G.2.a. – General Construction Requirements.

- i. This section states that the liner system will include a compacted clay liner or GCL in the leachate collection and sump areas. However, throughout the application it states that a GCL is not proposed as part of Cell 1L construction and GCL is not included in the design calculations or the design drawings. If GCL is not proposed to be used in the construction of Cell 1L, please revise this section's narrative to remove GCL as an option in the construction. If GCL is proposed to be used in the construction of Cell 1L, narrative throughout the application, the design calculations, and the design drawings should be revised to reflect the use of GCL. Please review and revise as appropriate.
- ii. This section states that the drainage soil layer is overlain by 12-inches of protective soil. The response to memo Comment G.2.a.ii. states that this 12-inch protective soil layer will have a hydraulic conductivity as described in the HELP Model. If a minimum hydraulic conductivity was specified for this layer in the HELP Model, then this hydraulic conductivity should be reflected in this section, elsewhere in the application, in the Technical Specifications, and in the Drawings. Please update this section accordingly to specify the hydraulic conductivity of the 12-inch protective soil layer above the drainage layer.

b. **Section G.2.b. – Composite Liners.** The title of this sub-section implies that the proposed liner system is a composite liner. However, the proposed liner system does not meet the requirements of a composite liner, as defined in Rule 62-701.200(23), F.A.C. and described in Rule 62-701.400(3)(b), F.A.C., and instead is proposed to meet the requirements of a bottom liner system for a Class III landfill contained in Rule 62-701.400(3)(g), F.A.C. Please revise the title of this sub-section accordingly.

c. Section G.2.d. – Geosynthetic Component Standards.

- i. Paragraph 3 of this section references an Earthwork specification contained in Appendix A, however there is no specification titled "Earthwork" included in Appendix A. Please revise the reference in this section to correspond with the appropriate technical specification included in Appendix A.
- ii. Paragraph 7 of this section states that interface shear strength testing between the subgrade and geomembrane, and between the geomembrane and the drainage soil are included in the Geomembrane specification. This section and the Geomembrane specification do not mention interfaces between the geomembrane and the compacted clay layer, or between the subgrade and the compacted clay layer. In accordance with Rule 62-701.400(3)(d)7., F.A.C., the interface shear strength of the actual components which will be used in the liner system shall be tested. This includes the interfaces of the compacted clay used in the liner system below the leachate corridors. Please revise this section and the Geomembrane specification accordingly.

15. Section 3 – Leachate Collection and Removal System (LCRS)

a. **Section G.3.b. – Other LCRS Requirements.** Please revise this section to include a discussion of the other components of the LCRS, including the sumps, pumps, manholes, force main, and

the leachate storage tank.

16. **Section 5 – Leachate Storage Tanks and Leachate Surface Impoundments.** This section states that cathodic protection of the leachate tank, and exterior and interior paint/coating shall be in accordance with the manufacturer's requirements. In order to adequately demonstrate compliance with Rule 62-701.400(6)(c), F.A.C., a technical specification which outlines the project specific requirements and design criteria of the proposed leachate tank should be included in Appendix A.
17. **Attachment G.2.a.5 – Anchor Trench Design Calculations.**
 - a. The unit weight of the cover soil appears to be high. Please explain its use for the calculation and provide a source the number used.
 - b. **Reference 2 – GM 13, Table 2(a).** It appears that there is an updated version of the test method and referenced Table 2(a). Please indicate why the most current version was not used and revise reference and update calculations as appropriate.
18. **Attachment G.3.a.2 – Leachate Collection Pipe Loading Calculations.** Please provide the basis and/or supporting references for the assumed unit weights of the liner system drainage sand (95 pcf) and waste (65 pcf) used in these calculations, as they do not appear to be consistent with the unit weights used in other parts of the application.
19. **Attachment G.3.a.3 – Geotextile Filter Design & Clogging Potential.** The provided clogging potential calculations appear to assess only the clogging potential of the geotextile filter. Please revise this section to include clogging calculations for the LCRS drainage sand as well.
20. **Attachment G.3.b.4 – HELP Modeling**
 - a. **Section 2: HELP Modeling Approach.** This section states that a 6-inch thick initial cover was assumed to be applied on top of the waste to minimize the stormwater intrusion into the landfill for all three scenarios, and that the precipitation intercepted by the initial cover will be managed as stormwater run-off. However, in the Design Data portion of Section 3, for scenarios 1 & 2 it is stated that only 75% of the cell would be available for stormwater run-off due to active waste filling and conditions such as differential settlement, and for scenario 3 only 90% of the cell would be available for run-off due to conditions such as differential settlement. The narrative of Section 2 should be revised to be consistent with the Design Data assumptions and clarify that 100% stormwater run-off was not assumed.
 - b. **Section 3: HELP Model Inputs**
 - i. **Climate Data.**
 - 1) This section states that the National Solar Radiation Database (NSRDB) containing the Typical Meteorological Year (TMY) data sets for the 1991-2005 timeframe were downloaded from the National Renewable Energy Laboratory's (NREL) website and cites (NREL). Please explain why data sets for a more current timeframe were not used, and please include a citation for this data in the list of references contained in Section 5.
 - 2) This section includes the citation (EPA 2020), however a citation is not included in the list of references contained in Section 5. Please include a citation for this reference document/data in Section 5.

ii. **Design Data.**

- 1) The section narrative discusses soil borings completed at the site as reported by a UES in a report dated 2000. However, the report and the borings discussed therein is from the current Enterprise Class III landfill site. Please revise the narrative to clarify which site will provide clayey soils for use as the cover soil, as the protective soil layer on top of the drainage layer, and to prepare the subgrade for Cell 1L. This comment should be discussed further during the meeting requested at the beginning of this letter. Depending on which site/borrow area the initial cover/protective layer soil will come from, updated testing and analyses may need to be performed to verify the hydraulic conductivity assumed for this material in the HELP Model.
- 2) Please note, the assumption of 75% stormwater run-off used in Scenarios 1 and 2, and 90% run-off used in Scenario 3 appear to be significant amounts of run-off from initial cover conditions. This comment should be discussed further during the meeting requested at the beginning of this RAI. Please revise the HELP Model analyses as necessary.

iii. **Table 1. HELP Model Scenario 1 Soil Layer Properties from Topmost Layer to the Bottom.** The layers appear to be incorrectly numbered. Please revise table accordingly.

- c. **Section 4 – HELP Modeling Results and Discussion.** The HELP Modeling Results summarized in Table 2 do not appear to be consistent with the data presented in the provided HELP Model Output data sheets. Please see the comments below related to the HELP Model Output data, and revise the HELP Modeling Results summarized in Table 2 as necessary.
- d. **HELP Model Input – Scenario 1.** Layers 1, 3, & 6 consist of the same soil material, however different initial soil water content values are presented (0.2278 vol/vol, 0.36 vol/vol, and 0.2976 vol/vol, respectively). Please explain why different soil water contents were used for Layers 1, 3, & 6.
- e. **HELP Model Output – Scenario 1.** Based on the Scenario 1 HELP Model Output, it appears that the maximum head on the liner for Scenario 1 was approximately 7.8 inches (see page 111 of 336 of Scenario 1 results). However, the Peak Values Summary for Scenario 1 (see page 335 of 336) states that the maximum head on the liner (Layer 5) was 11.0452 inches. Please explain this apparent difference between the output data and the summary data and revise as necessary.
- f. **HELP Model Input – Scenario 2.** Layers 1, 3, & 6 consist of the same soil material, however different initial soil water content values are presented (0.2278 vol/vol, 0.36 vol/vol, and 0.2976 vol/vol, respectively). Please explain why different soil water contents were used for Layers 1, 3, & 6.
- g. **HELP Model Output – Scenario 2.** Based on the Scenario 2 HELP Model Output, it appears that the maximum head on the liner for Scenario 2 was approximately 8.2 inches (see page 111 of 336 of Scenario 2 results). However, the Peak Values Summary for Scenario 2 (see page 335 of 336) states that the maximum head on the liner was 11.2598 inches. Please explain this apparent difference between the output data and the summary data and revise as necessary.
- h. **HELP Model Input – Scenario 3.** Layers 1, 3, & 6 consist of the same soil material, however different initial soil water content values are presented (0.2239 vol/vol, 0.36 vol/vol, and 0.2976 vol/vol, respectively). Please explain why different soil water contents were used for Layers 1, 3, & 6.

- i. **HELP Model Output – Scenario 3.** Based on the Scenario 3 HELP Model Output, it appears that the maximum head on the liner for Scenario 3 was approximately 5.6 inches (see page 126 of 336). However, the Peak Values Summary for Scenario 3 (see page 335 of 336) states that the maximum head on the liner was 8.0987 inches. Please explain this apparent difference between the output data and the summary data and revise as necessary.

21. **Attachment G.2.b.2-2 – Leachate Collection System, Pump and Force Main Design.** Several of the annual totals for HELP model outputs for Water at Start of Year and Soil Water at End of Year (cubic feet column) are obscured. Please revise to display all numbers on the outputs.

PART H – HYDROGEOLOGICAL AND GEOTECHNICAL INVESTIGATION REPORT (62-701.410(2-4), F.A.C.)

22. **Section 1.1 – Purpose and Scope of the Hydrogeologic and Geotechnical Investigation Report.**

See Comments 51.a. and 51.b., below. The report does not address condition (g) of Rule 62-701.410(3), F.A.C. which specifies if the investigation indicates that portions of subsurface below the disposal facility show signs of past sinkhole activity, or are reasonably expected to develop sinkholes or sinkhole activity in the future, additional geotechnical investigations shall be included to further characterize the subsurface below the disposal facility for the purpose of assessing potentially unstable areas and for evaluating the effectiveness and design for any engineering measures proposed for any potentially unstable areas. The investigation shall also include an evaluation of any engineering measures needed to provide reasonable assurance that the subsurface of the site in those areas will be adequate to support the disposal facility without adversely affecting the performance of the liner or leachate collection system. This comment should be discussed further during the meeting requested at the beginning of this RAI, and the report revised as necessary.

23. **Section 1.3 – Site Investigation.**

- a. The narrative indicates a total of six SPT borings were advanced during Phase 2 however, soil boring NB-20 was not initiated and therefore only five borings were completed. Please revise the narrative accordingly.
- b. No investigation has occurred in the area of the leachate storage area to determine subsurface stability per Rule 62-701.400(6)(c)1., F.A.C. Additional soil boring(s) are likely warranted. This should be discussed further at the meeting requested in this letter.
- c. The borings provided in Attachment H.4 indicate that a total of three Shelby tubes were collected in borings NB-4, NB-10 and NB-22. Please explain why only one Shelby tube was analyzed.
- d. None of the twenty-two soil borings completed at the site had any laboratory testing completed to characterize soil types and properties and to verify field classifications. Please explain the lack of soil testing in all soil borings.

24. **Table H.1 – Well Screen Elevations.** Please revise the table to indicate what vertical datum is used for the tops and bottoms of the well screens.

25. **Table H.2 – Well Screen Elevations.** As indicated in the associated narrative, the elevations listed appear to be groundwater elevations, not well screen elevations as titled. Please revise table title accordingly.

26. **Section 2.2 – Site Geology.** The section narrative indicates that limestone was encountered from -66 ft. NGVD to 92 ft. NGVD. However, the Geotechnical Site Investigation Report by UES

(Attachment I.1) indicated that the depth to limestone in NB-13 was at +100.3 NGVD. Please revise this section accordingly.

27. Section 2.3 – Fault Areas.

- a. The section narrative indicates that an evaluation of seismic impact zones is provided in the revised UES report (Attachment I.1.f.). However, there is no Attachment I.1.f. and the Geotechnical Exploration report submitted by UES and dated March 30, 2022, as Attachment I.1 does not appear to be revised. Please update the text accordingly.
- b. The section narrative indicates UES evaluation concluded that the site meets the requirements of 40 CFR 258.13 with respect to fault areas. See Comment 48., below regarding the UES evaluation of 40 C.F.R. 258.13.

28. Section 2.4 – Seismic Impact Zones.

- a. The section narrative indicates that an evaluation of seismic impact zones is provided in the revised UES report (Attachment I.1.f.). However, there is no Attachment I.1.f. and the Geotechnical Exploration report submitted by UES and dated March 30, 2022, as Attachment I.1 does not appear to be revised. Please update the text accordingly.
- b. The section narrative indicates UES evaluation concluded that the site meets the requirements of 40 CFR 258.14 with respect to seismic impact zones. However, the UES report does not include an evaluation of seismic impact zones. Please update section text accordingly.

29. Section 3.1.3 – Regional Groundwater Flow. The section narrative indicated that regional flow in the area of the site ranged between 80 to 60 feet NGVD. However, the attached figure in H.9 appears to indicate potentiometric surface of the Upper Floridan in the area of the site is between 80 and 90 ft. NGVD. Please review and update the narrative accordingly.

30. Section 3.2.2.1 – Seasonal High Groundwater Table.

- a. Per Rule 62-701.410(3)(d), F.A.C., please include estimates of the average potentiometric surface across the site.
- b. The section narrative indicates the Seasonal High Groundwater Table (SHGWT) was determined from site specific groundwater data. However, only two events with groundwater elevation measured in the on-site wells and both events occurred during the dry season. Due to the limited data from onsite wells, additional evaluation of nearby Floridan monitoring wells associated both the East Pasco Closed Class I Landfill and the Enterprise Class III landfill should be completed. The revised estimate of SHGWT should be updated throughout the application and the design of the liner system (i.e., compacted clay layer beneath the LCRS) revised as necessary.

31. Section 3.2.2.3 – Site Groundwater Flow, Groundwater Flow Velocity. The narrative indicates the effective porosity used for the equation was 0.2 to 0.5 as sourced from Driscoll, 1986. However, the effective porosity utilized does not match the porosities provided in the cited source. Please recalculate flow velocity or provide a justifiable alternate source for the effective porosities provided.

32. Section 3.2.2.4 – Background Water Quality.

- a. The section narrative indicates that the U.S. Environmental Protection Agency considers Bromodichloromethane a common laboratory contaminant. Please provide the reference for this statement.

- b. The ENCO laboratory report did not contain a project narrative which identified the detections of bromodichloromethane as a result of a possible laboratory contamination. Please resample monitoring wells NMW-1, MNW-2 and NMW-3 for bromodichloromethane to verify the presence of the constituent.

33. Section 3.3 – Site Contamination Evaluation.

- a. Comment H.1 of the Department's memo on the previous draft permit application related to Site Contamination Evaluation identified that the evaluation did not include nearby and adjacent areas (e.g. chicken farm, adjacent County landfill, IW Pond 3, etc.). Please revise the evaluation to address these areas and update the narrative accordingly.
- b. The desktop query using Map Direct for site contamination does not appear to have included all applicable layers that would indicate contamination at or near the subject site (e.g. State-Owned Lands Cleanup Program (SOLCP), Statewide coverage of Site Investigation Section (SIS) sites, State-funded cleanup program, ERIC (Environmental Restoration Integrated Cleanup) sites). Please provide the results of an updated query with additional contamination layers.

34. Section 3.4 – Water Well Survey.

- a. Per Rule 62-701.410(2)(b), F.A.C. the report should include a tabled inventory of all the public and private wells within a 1-mile radius of the site and the inventory should include the information listed in Rule 62-701.410(2)(b)1. through 3., F.A.C.
- b. The narrative indicates that the survey conducted did not review the Southwest Florida Water Management District (SWFWMD) well construction permit database. Please update survey to include a review of the SWFWMD database.

35. Attachment H.2 - Boring Transect West-East. The plan view map incorrectly labels the monitoring wells as MW-1 through MW-4 and soil boring NB-8 as MW-8. Please revise this figure accordingly.

36. Attachment H.3 – Boring Transect North-South. The plan view map incorrectly labels the monitoring wells as MW-1 through MW-4 and soil boring NB-8 as MW-8. Please revise this figure accordingly.

37. Attachment H.4 – Boring Logs.

- a. The boring log for NB-14 indicates that after 70 ft. bls. sampling occurred at 10-foot intervals due to "*lithologic consistency*". However, the lithology recovered appears to change at each sampled interval after 80 feet. Please explain this discrepancy.
- b. The boring log for NB-15 indicates the lithologic description for the 25-foot sample was gray sand w/ "CS" fragments. Please explain what CS is.

38. Attachment H.5 – Shelby Tube Analytical Report.

- a. The laboratory report indicates that the specimen boring date was July 19, 2019. However, the boring log for NB-4 indicates the date of drilling was July 18, 2019. Please verify the date the soil boring was completed and revise the applicable documents.
- b. The report indicates a total of at least 84 days from the sampling of the soils and the analysis. Please provide verification that the sample was sealed, the sealing method used, the preservation method used when storing the sample and confirmation from the laboratory that the time held

before analysis did not affect the sample or the test results.

39. **Attachment H.6 – Monitoring Well Completion Report.** Boring field reports for monitoring wells NMW-1, NW-2, NMW-3 and NMW-4 appear to have the inaccurate depths for the lithologic symbols when compared to the depths provided in the soil descriptions. Please review and revise accordingly.
40. **Attachment 3 – Survey.**
- a. The survey identifies test locations of hand auger borings HA-1, HA-2 and HA-3 and provides location and ground surface elevation for these borings. However, the narrative indicates these boring were never completed. Please explain this discrepancy and revise necessary portions of the report.
 - b. The survey has not been signed by the professional surveyor & mapper. Please provide a signed and sealed copy of the survey.
41. **Attachment 5 – Sampling Field Data Sheets.**
- a. The total well depths presented on form FD 9000-24 for monitoring wells NMW-1, NMW-2, NMW-3 and NMW-4 are different than those provided in well completion reports and elsewhere in the report. Please explain this discrepancy.
 - b. The sampler's name and the sampler's signature do not appear to match on all of the groundwater sampling logs. Please provide an explanation.
42. **Attachment H.7 – Slug Test Results.** The aquifer model used in the analysis for monitoring wells NMW-1 and NMW-4 was unconfined while the aquifer model used for the analysis of monitoring wells NMW-2 and NMW-3 was confined. Please explain this discrepancy and re-run the analysis as applicable.
43. **Attachment H.8 – Groundwater Contour Maps.** One or more of the property boundaries shown on the two groundwater contour maps appear to be slightly offset. Please verify and address as appropriate.
44. **Attachment H.11 - Parameters Reported Above Applicable Laboratory Detection Limits.** The result listed for Ammonia as Nitrogen for monitoring well NMW-1 appears to be missing a decimal point. Please review and revise accordingly.

PART I – GEOTECHNICAL INVESTIGATION REQUIREMENTS (62-701.410(3) and (4), F.A.C.)

The Geotechnical Site Investigation Report should be discussed further during the meeting as requested at the beginning of this letter. The revised Geotechnical Site Investigation Report will be reviewed in its entirety upon receipt of the response to this RAI.

Attachment I.1 – Geotechnical Site Investigation Report

45. **Section 1.2 - Project Description.** The section narrative indicates well completion reports for MW-1 through MV-4 was used for analysis. However, the monitoring wells completed within the vicinity of the proposed Cell 1L were NMW-1 through NMW-4. Please verify these were the wells used in analysis and revise section as necessary.

46. Section 2.1 – Purpose.

- a. The section narrative indicates that its purpose is to evaluate and address seismic impact zones. However, the report does not discuss address seismic impact zones. Please updated the geotechnical report accordingly.
- b. The section narrative indicates that its purpose is to evaluate and address seismic impact zones as described in 40 C.F.R. 258.13. However, seismic impact zones are covered in Section 258.14 of 40 C.F.R. Please revise statement accordingly.

47. Section 3.1 – Surface Conditions. The section narrative indicates topographic quadrangle maps were reviewed. However, depressional features that exist at the site and within a portion of the proposed Cell 1L boundary were not identified. Per 62-701.410(3)(f)2., F.A.C., please revise relevant sections accordingly.

48. Section 3.3 – Photolineament Trace Analysis. The report narrative indicates that one of its purposes is to evaluate and address fault areas as described in 40 C.F.R. 258.13. However, 40 C.F.R. 258.13 bans lateral expansions within 200 feet of faults that have experienced displacement during the Holocene Epoch. The report narrative does not appear to address this. Please revise report narrative to include evaluation and discussion of this item.

49. Section 3.5 – Borings NB-4, NB-7, NB-19 And NB-23 Discussion. The narrative does not discuss the presence of a paleokarst feature exemplified by a significant increase in depth to limestone in borings NB-23 and NB-14 in comparison to nearby borings. This feature is large, greater than 250 feet long, along its longest axis, and is proximal to the northeast-southwest lineament which extends into the proposed Cell 1L. Please revise the section to include a discussion of the paleokarst feature.

50. Section 3.6 – Groundwater.

- a. The narrative indicates the Seasonal High Groundwater Table (SHGWT) is 70 ft. NGVD. See Comment 30.b., above in regard to the SHGWT. Please revise section as applicable.
- b. The remainder of the section narrative seems to have been cut off. Please review and revise accordingly.

51. Section 3.7 – Sinkhole Potential Evaluation.

- a. According to the section narrative, the presence of sinkhole activity can be indicated by “a depression of the top of, or opening, or voids within, the limestone bedrock”. As indicated in the Locklear & Associates report, boring NB-23 was located to evaluate the potential features identified in historical aerial photographs. Additionally, this boring was proximal to the northeast-southwest lineation. Boring NB-23 encountered limestone at approximately –67 feet NGVD in contrast to two adjacent borings NB-7 and NB-11 which both encountered limestone at approximately +30 feet NGVD, a difference of nearly 100 feet. Additionally, boring NB-14, which according to the report narrative has had the upper sandy soils mined away, encountered limestone at a depth of approximately -50 feet NGVD. This large (greater than 250 feet in length) paleokarst feature has not been addressed as a past subsidence feature or it’s potential for reactivation and continued subsidence. Please update the section to address the paleokarst feature including a determination if the feature is reasonably expected to reactivate in the future per Rule 62-701.410(3)(g), F.A.C.
- b. Soil boring NB-1 encountered a geologic profile consistent with the beginning stages of sinkhole activity. This boring encountered a possible infilled void or cavity within the upper portion of the

limestone from approximately 37 feet bls to 47 feet bls. as indicated by clastic soils (clay and silty sand) encountered below highly weathered to weathered limestone (N-values of 17, 14 and 29). Additionally, a loss of drilling fluid circulation occurred within the infilled void at 42 feet bls. The conditions found in NB-1 were not addressed in the sinkhole evaluation. Please revise report to address these geologic conditions.

- c. The section narrative indicated a review of the "FGS map" was reviewed *and* "...no reported sinkholes were noted in the immediate vicinity." Please provide a scaled figure of the map reviewed.

52. **Appendix B, Unnumbered Figure – Photolineament Trace.** Please revise the figure to include the location (outline) of Cell 1L.

53. **Appendix B, Unnumbered Figure – Jay Fault Line.** According to Smith & Lord (1997) The Jay Fault is curvilinear and positioned differently than what is shown on this figure. Please review and revise accordingly.

Attachment I.1.E – Foundation Analysis

54. **Slope Stability Model Analysis.** The seasonal high groundwater table used for slope stability analysis was 70.0 feet NGVD. See Comment 30.b., above. Based on the response to Comment 30.b., the analysis and corresponding figures may need to be revised to incorporate a different SHGWT.

55. **Geosynthetic Interface Friction Estimate.** This section identifies interface layers as drainage soil/geosynthetic, geosynthetic/geosynthetic, and geosynthetic/foundation soil. The 60 mil HDPE geomembrane is the only geosynthetic component included in the bottom liner design; a compacted clay layer is included in the leachate corridors in lieu of a GCL. Please identify and verify the individual layers used in these analyses and revise the analyses as necessary.

56. **Settlement Estimates.** The seasonal high groundwater table used for settlement calculations was 70.0 feet NGVD. See Comment 30.b., above. Based on the response to Comment 30.b., the analysis and corresponding figures may need to be revised to incorporate a different SHGWT.

57. **Figure 11 – Pre-Mining Conditions With Borings.**

- a. The figure has the monitoring wells labeled as MW-1 through MW-4. However, the monitoring wells are NMW-1 through NMW-4. Please revise figure accordingly.
- b. Hand auger borings HA-1 through HA-3 are included on this figure. Please see Comment 40.a., above. Please update the figure based on the response to Comment 40.a.

58. **Figure 12 – Laterals With Borings.** The legend depicts the limits of waste with a green line however the feature appears to be represented by a solid black line. Please revise accordingly.

59. **Figure 14 – Lateral Settlement Points With Borings.** The legend depicts the limits of waste with a green line however the feature appears to be represented by a solid black line. Please revise accordingly.

60. **Figure 15 – Cross Slope Settlement Points With Borings.** The legend depicts the limits of waste with a green line however the feature appears to be represented by a solid black line. Please revise accordingly.

61. **Attachment J.**

- a. Please provide a figure which includes post-settlement elevations at boring locations

provided in this section. Areas which demonstrate higher settlement values (e.g. those which appear to coincide with the paleokarst feature with increased depth to limestone) may require additional geotechnical evaluation to fully delineate the extent of affected areas. This should be discussed further at the meeting requested in this letter.

- b. Please provide an evaluation that demonstrates that areas of peak settlement (e.g. NB-7, NB-23, NB-22) are not going to impact the integrity of the liner systems and leachate collection and transmission systems, including liner penetrations (e.g. NB-11), due to differential stress/settlement.

PART K – LANDFILL OPERATION REQUIREMENTS (62-701.500, F.A.C.)

The Operations Plan should be discussed further during the meeting requested at the beginning of this letter. The revised Operations Plan will be reviewed in its entirety upon receipt of the response to this RAI.

Operations Plan

62. **Section 3.1.1 – Acceptable and Unacceptable Waste Materials.** Please revise this section to indicate whether CCA treated wood will be an acceptable or unacceptable waste material.
63. **Section 3.1.3 – Handling and Containment of Unacceptable Waste Materials.** Please revise this section to specify the maximum number of white goods that will be stored prior to removal.
64. **Section 3.1.4 – Transportation of Unacceptable Waste.** This section states that unacceptable waste will be removed from the facility within 30 days of the waste being unloaded at the facility. The response to memo Comment K.15 indicates that unacceptable waste will be removed every 30 days. Please review and revise the Operations Plan as necessary. Please note, if unacceptable wastes are to be removed within 30 days of receipt, a description of how the facility will track receipt dates should be included in the Operations Plan.
65. **Section 6 – Method and Sequence of Filling Waste**
 - a. This section states that the Operations Manager may employ other operations to minimize and manage stormwater so that it does not become leachate. Please revise this section to specifically identify and describe optional stormwater management practices that may be used.
 - b. This section states that waste lifts will be approximately 10 feet in compacted thickness. Based on recent request for modification at the adjacent Class III landfill, please review proposed procedures regarding lift thickness and revise as appropriate.
66. **Section 7.1 – Waste Compaction.** This section states that tree debris is separated from the waste and periodically processed for on-site uses. Yard waste which is commingled with Class III may not be segregated and recycled. Incoming mixed loads should be classified at the highest appropriate waste classification and managed and disposed as such. Please review and revise this section as appropriate.
67. **Section 8.1.2 – Methane Gas Measurement.**
 - a. Please revise this section to reference the figure provided in Part N which shows the location of the gas monitoring and ambient monitoring points.
 - b. Part N of the application indicates that a description of the location and construction details for soil monitoring probes is provided in Section 8 of the Operations Plan. However, no descriptions

in the section narrative are provided. Please revise section narrative to include these descriptions.

68. **Section 16.1 – Leachate Collection and Removal System.** This section states that stormwater accumulated within the secondary containment area shall be disposed of in accordance with Rule 62-701.400(9), F.A.C. Please revise this section to describe the site-specific operational procedures to be followed to manage stormwater in the secondary containment area of the leachate tank.
69. **Section 16.4 – Leachate Management Contingency Plan.** This section states that in the event that leachate cannot be treated and disposed of as designed, leachate will be pumped directly from the pump station or the forcemain outlet into a tanker truck for off-site treatment and disposal. This narrative does not appear to be consistent with the proposed use of a leachate storage tank. Please review and revise as necessary.
70. **Section 19.6 – Fire Protection and Fire Fighting Facilities.** This section states that firefighting water may be obtained from the on-site retention pond or fire hydrant, however the response to memo Comment K.20 indicates that there is no on-site pond for firefighting water. Please review and revise this section as necessary.
71. **Section 19.7 – Hot Loads and Spills.** This section states that hot loads which have been extinguished will be inspected by a spotter and disposed of once it has cooled completely. Please note, hot loads will not be able to be adequately spotted because fire damage may render the material unrecognizable. Therefore, hot loads which have been extinguished should be disposed of as a Class I waste. Please revise this section accordingly.
72. **Exhibit D – Methane Gas Monitoring Data Sheet.** The gas probes listed on this sample data sheet do not appear to be consistent with the gas probes listed in Part N. Please review and revise as necessary.
73. **Exhibit E – Daily Inspection Sheet and Leachate Log.** The sample inspection sheet and leachate log does not appear to be site specific for Cell 1L (e.g., surface impoundments are included, but the leachate tank is not). Please review and revise the sample inspection sheet and leachate log to contain site specific information related to Cell 1L.

PART L – WATER QUALITY MONITORING PLAN (62-701.510, F.A.C.)

74. **Section 2(d) – Groundwater Monitoring Requirements.**
 - a. Monitoring well NMW-3 appears to be directly at the edge of waste. Please explain how this well will not be damaged during construction of the liner system and how this will function as a detection well when located directly adjacent to the cell.
 - b. The section narrative indicates the monitoring wells are located no more than 50 feet from the edge of waste. However, monitoring well NMW-4 is located approximately 120 feet from the edge of waste which does not meet criteria for a detection well per Rule 62-701.510(3)(a), F.A.C. nor a compliance well per Rule 62-701.510(3)(b), F.A.C. A replacement well should be proposed.
 - c. The downgradient detection well spacing does not appear to meet the criteria listed in Rule 62-701.510(3)(d)1., F.A.C. Please review and revise monitoring well spacing and/or add additional monitoring wells to the proposed monitoring network as needed to comply with the rule.
 - d. Monitoring well construction details and diagrams for the proposed monitoring wells have not been provided. Please revise plan include monitoring well construction diagrams for the

proposed wells.

- e. None of the proposed wells have been designated as a background well. Please provide a table that identifies which well are background wells and which wells are to be designated as detection wells and/or compliance wells.

75. **Section 2(e) – Surface Water Monitoring Requirements.** The section narrative indicates “the pond” will not have off-site discharge. However, there will be more than one pond constructed on this site. Please revise narrative accordingly.

76. **Section 2(g)(1) – Sampling Frequency and Requirements.**

- a. The table number (listed as Table L.1) appears to be incorrectly numbered compared to the number referenced in the narrative (Table g.1). Please revise table number accordingly.
- b. Table L.1 indicates the groundwater sampling parameters for initial background water quality include those parameters listed in 40 C.F.R. Part 258, Appendix I. However, rule requirements indicate that the parameters should also include those listed in 40 C.F.R. Part 258, Appendix II. Please revise table accordingly.

77. **Section 2(g)(2) – Sampling Frequency and Requirements.** See Comment 31, above. Sampling frequency should be re-evaluated after the flow velocities have been recalculated and the monitoring plan updated accordingly.

78. **Figure L.1 – Proposed Monitoring Well Location Map.** The figure does not include the location of the zone of discharge (ZOD). Please revise the figure accordingly.

PART M – SPECIAL WASTE HANDLING REQUIREMENTS (62-701.520, F.A.C.)

79. **Section 4 – Management of Contaminated Soil.** This section generally states that contaminated soil may be disposed of in permitted, lined landfills. By definition, Class III wastes are “materials that are not expected to produce a leachate that poses a threat to public health or the environment” and therefore shall not leach in excess of Department groundwater standards. Please revise this section to address whether this site will accept contaminated soil. If contaminated soil is to be accepted at the facility in accordance with Rule 62-701.520(4), F.A.C., please revise this section and the Operations Plan to include site specific procedures for acceptance of contaminated soil, including procedures for waste analysis and standards for comparison of sampling to ensure the material is not hazardous and will not leach in excess of Department groundwater standards.

PART N – GAS MANAGEMENT SYSTEM REQUIREMENTS (62-701.530, F.A.C.)

80. **Section 2 – Gas Monitoring Requirements.** This section states that a description of the location of ambient monitoring points and soil monitoring probes is provided in Section 8 of the Operations Plan, however this information does not appear to be included in the referenced Operations Plan section. Please review and revise this section and/or the Operations Plan as necessary.

81. **Figure i.1 - Proposed Gas Probe Location Map.**

- a. The property boundary for the site is not consistent with the property boundary proved in other parts of the application. Please review and revise boundary and add any additional gas probes as applicable.
- b. One of the property boundaries shown on the map appear to be slightly offset. Please verify and address as appropriate.

PART O – LANDFILL CLOSURE REQUIREMENTS (62-701.600, F.A.C.)

82. Please note, it appears that the Closure and Long-Term Care Plan included in Part O was provided in support of the financial assurance cost estimates only and not as the final closure design of the facility. Therefore, Part O was not reviewed and evaluated for final design. A separate closure permit will be required prior to closure construction in accordance with Rule 62-701.600, F.A.C.

83. **Section 1.5 – Final Cover Design.** This section lists initial cover as a component of the final cover design. Please review and verify whether initial or intermediate cover is intended to be part of the final cover design.

PART P – OTHER CLOSURE PROCEDURES (62-701.610, F.A.C.)

No comments.

PART Q – LONG-TERM CARE (62-701.620, F.A.C.)

No comments.

PART R – FINANCIAL ASSURANCE (62-701.630, F.A.C.)

84. **Attachment R.1- Financial Assurance Forms.** Please revise the Closure Cost Estimating Form (DEP Form #62-701.900(28), F.A.C.) as necessary based on the comments below.

85. **Attachment R.2 – Financial Assurance Cost Estimates and Supporting Documentation**

Cost Estimate Information and Assumptions - Closure

a. **Item 2 – Slope and Fill.**

- i. This section points to Reference 1 for the unit costs for grading and compaction, however the unit costs provided appear to be from RS Means and contained in Reference 2. Please review and update the reference citation included in this section as necessary.
- ii. Please revise this section and the cost estimate form to include the quantities and cost for the soil barrier layer between the waste and geosynthetic cover material should be provide in this section.

b. **Item 6 – Stormwater Control System.** Please review and verify the calculation included in this section converting the unit cost for fill material used to construct tack-on berms from price per cubic yard (CY) to price per linear feet (LF). The calculation does not appear to convert the volume of the berms (28 SF * 4,710 LF) to CY to calculate the total cost prior to then calculate a unit cost per LF. Please revise this section as necessary.

c. **Item 7 – Gas Control: Passive.** This section points to Reference 8 for the third-party quote used to prepare this cost, however the quote for construction of passive gas vents appears to be included in Reference 6. Please review and revise the reference citation included in this section as necessary.

d. **Item 11 – Professional Services.** Please verify and explain how the total construction cost (\$2,843,418.40) cited in this section was calculated (i.e., explain which closure cost items were included in this total). The total cost cited does not appear to be the summation of the individual closing costs included in Items 1-10 or Item 13. Please review and revise the calculations and costs for professional services as necessary.

e. Item 13 – Site Specific Costs

- i. White goods are not included in the special wastes listed in this section. Please see Comment 63 above and revise the site-specific costs to include removal and disposal costs for the maximum number of white goods proposed to be stored.
- ii. This section cites Reference 11, however the third-party quote for special wastes appears to be included in Reference 10. Please review and revise the reference citation included in this section as necessary.

Cost Estimate Information and Assumptions – Long-Term Care

f. Item 5 – Leachate Collection/Treatment Systems/Maintenance

- i. This section includes a cost associated with jet cleaning and video inspection of the leachate collection and removal system; however, this cost does not appear to have been included on the cost estimate form. Please review and revise the cost estimate form to include the cost for jet cleaning and video inspection.
 - ii. This section and the cost estimate form include a cost associated maintenance of Pond 4, however Pond 4 is no longer included in the design of Cell 1L as a leachate impoundment. Pond 4 is now included as a stormwater pond, therefore cost associated with maintenance of Pond 4 should be included under Item 10. Please review and revise as necessary.
- g. Item 10 – Stormwater Management System Maintenance.** This section states that a lump sum annual cost of \$3,319.50 will be required for stormwater pond maintenance, however a calculation based on unit costs obtained from RS Means is also provided in this section and estimates an annual cost of \$3,655.50 for stormwater pond maintenance. The calculated cost (\$3,655.50) is the cost included on the cost estimate form. Please review and revise this section and/or the cost estimate form as necessary.

APPENDIX A - CONSTRUCTION QUALITY ASSURANCE (CQA) PLAN WITH TECHNICAL SPECIFICATIONS (62-701.400, F.A.C.)

Construction Quality Assurance (CQA) Plan

86. The provided CQA Plan does not appear to be substantially based on site specific information and design requirements, as required by Rules 62-701.400(3)(f)3 and 62-701.400(7) and (8), F.A.C. Such site-specific information includes, but is not limited to, the identification of in-situ test methods, laboratory test methods, conformance testing, sampling/testing frequencies, etc. to be performed during construction of Cell 1L. The CQA Plan should be discussed further during the meeting requested at the beginning of this letter. The revised CQA Plan will be reviewed in its entirety upon receipt of the response to this RAI. The comments below are based on initial review of the CQA Plan.
87. **Section 3.2 – Facility Owner/Operator.** This section states that the facility is owned and operated by the Leon County Board of Commissioners, and operating personnel include Mr. Robert Mills, Jr., Assistant Public Works Director. Please revise this section of the CQA Plan to identify Angelo's Aggregate Materials, Ltd. as the facility owner.
88. **Section 3.3 – Owner's Representative.** Please revise this section to identify the Owner/Operator's representative.

89. **Section 3.4 – Design Engineer.** Please revise this section to identify the Engineer of Record.
90. **Section 3.8 – Geosynthetics Manufacturer.** In accordance with Rules 62-701.400(3)(e) and 62-701.400(7)(b), F.A.C., please revise this section to include the minimum qualifications of the geosynthetics manufacturer to demonstrate that they possess the training and experience necessary to fulfill their identified responsibilities.
91. **Section 3.9 – Geosynthetics Installer.** In accordance with Rules 62-701.400(3)(e) and 62-701.400(7)(b), F.A.C., please revise this section to include the minimum qualifications of the geosynthetics installer to demonstrate that they possess the training and experience necessary to fulfill their identified responsibilities.
92. **Section 3.10 – CQA Geosynthetics Laboratory.** In accordance with Rules 62-701.400(3)(e) and 62-701.400(7)(b), F.A.C., please revise this section to include the minimum qualifications of the CQA geosynthetics laboratory.
93. **Section 3.11 – CQA Soils Laboratory.** In accordance with Rule 62-701.400(8)(a), F.A.C., please revise this section to include the minimum qualifications of the CQA soils laboratory.
94. **Section 5 – Earth Material Quality Assurance.** This section of the CQA Plan does not provide site specific information to adequately meet the requirements of Rule 62-701.400(8)(a), F.A.C., which states that the plan shall specify performance criteria for the soil liner, and provide quality control testing procedures and minimum sampling frequencies. Please revise this section to include this site-specific information, including QA/QC procedures, tests and requirements for all soil components included in the design of Cell 1L (i.e., prepared subgrade, compacted clay layer, drainage layer, protective cover layer).
95. **Section 6 – Geosynthetic Material Quality Assurance.** This section of the CQA Plan does not provide site specific information to adequately meet the requirements of Rule 62-701.400(7), F.A.C., including a detailed description of the procedures and tests that will be used to monitor the installation of the liner system components, and a detailed description of the sampling activities, sample size, sample locations, frequency of testing, acceptance and rejection criteria, and plans for implementing corrective measures. Please revise this section to include this site-specific information.
96. Please revise the CQA Plan to include a section addressing QA/QC procedures and requirements related to all components of the LCRS (i.e., pipes and pipe fittings, liner penetrations, manholes, sumps, pumps, and the leachate storage tank).

Technical Specifications

97. The provided Technical Specifications do not appear to be substantially based on site-specific information and design requirements and may be incomplete and/or missing information. The Technical Specifications should be discussed further during the meeting requested at the beginning of this letter. The revised Technical Specifications will be reviewed in their entirety upon receipt of the response to this RAI. The comments below are based on initial review of the Technical Specifications.
98. Multiple technical specification sections provided with the CQA Plan include references to specification sections that were not submitted as part of this application (e.g., Section 01 33 00 – Submittal Procedures is referenced in multiple specifications; Section 01 60 10 – Transportation and Handling, Section 01 16 11 – Storage and Protection, Section 01 70 00 – Contract Closeout, and Section 01 40 00 – Quality Assurance/Control are referenced in the Vegetation specification, etc.).

Please review and verify that all relevant technical specifications have been provided and that the technical specification sections provided with this application are site specific for the construction of Cell 1L and reflect the design requirements and criteria described in all other parts of the application. Please revise the technical specifications as necessary.

99. **Section 31 23 23 – Earthfill.** This specification includes multiple references to a C&D cell or a C&D footprint (e.g., Section 31 23 23 – Earthfill, Parts 2.1C & 3.6B). Please review and verify that this specification section was prepared based on site specific design criteria and requirements for the construction of Cell 1L.
100. **Section 31 91 13 – HDPE Geomembrane.**
- a. This specification section includes multiple references to parts that do not appear to have been included in the specification section (e.g., Part 1.6A references Part 2.1G, and Part 3.7E references Part 4.3E, however Parts 2.1G and 4.3E do not exist within this specification section). Please review and verify that this specification section is complete and was prepared based on site specific design criteria and requirements for the construction of Cell 1L and revise the specification section as necessary.
 - b. This specification section references a GCL specification section and includes multiple reference to use of GCL in the liner system, however GCL is not included in the design of Cell 1L as provided in this application. Please review this specification section and verify that it was prepared based on site specific design criteria and requirements for the construction of Cell 1L and revise the specification section as necessary.

APPENDIX B – DRAWINGS (Rule 62-701.320(7)(f), F.A.C.)

Comments on the drawings will be discussed in greater detail during the meeting suggested at the beginning of this letter, particularly as it relates to design changes/revisions resulting from comments noted elsewhere in this letter. The Drawings will be reviewed in their entirety upon receipt of the response to this RAI.

101. The Drawings included in the provided Plan Set are marked “Permit Set Only – Not for Construction.” Please note, Department permits are issued for the specific processes and operations applied for and indicated on the approved drawing or exhibits. Therefore, drawings provided with an application shall be “construction-level” drawings, being of sufficient detail to show how the facility is designed and will be constructed and operated.
102. **Sheet C4.00 – Bottom Liner Grading and Leachate Collection System Plan.** See Comment 107, below. Please revise detail number(s) for the leachate conveyance manhole 1 and/or pump station as applicable.
103. **Sheet C5.00 – Conceptual Final Cover Grading Plan.** The Pond 4 continuation appears to have cropped out some labeling. Please revise detail accordingly.
104. **Sheet C6.00 –Leachate Storage Area and Details, Detail 2.** The secondary containment wall doesn't indicate what type of material it is constructed of. Please revise detail to include construction material.
105. **Sheet C7.00 – Bottom Liner Details.** A detail for rain cover anchorage at intercell berms is shown. Please provide a detail and locations where intercell berms will be located.
106. **Sheet C7.10 – Sump Penetration and LCRS Details.** Please explain the purpose of the vertical

solid pipe connecting the perforated collection pipes to the sump shown in the Leachate Sump Penetration Blow Up detail.

107. **Sheet C7.20 – Leachate Conveyance Structure Details.** Both the Leachate Pump Station detail and the leachate conveyance manhole 1 detail have the same detail number (1). Please revise number(s) accordingly.

RESPONSE LETTER TO MEMORANDUM FOR THE DRAFT PERMIT APPLICATION TO CONSTRUCT AND OPERATE PROPOSED LINED CELL 1L

108. The response to Comment H.17. indicates that the Operations Plan was revised to include the appropriate construction techniques to be utilized in the event that limestone is encountered at elevations at or above the bottom elevation of the landfill. However, the Operations Plan does not appear to address this issue. Please update the Operations Plan to address this issue.
109. The response to Comment 9.a.i for Appendix B indicates that buoyancy calculations will be performed at time of installation. In order to provide reasonable assurance that the leachate pump station will not be subject to uplift from SHGW contact, please provide ballast calculations that support installation as designed.

Attachment: Notice of Application

Rule 62-110.106(5), F.A.C. – Notices: General Requirements. Each person who files an application for a Department permit or other approval may publish or be required to publish a notice of application or other notice as set forth below in this section. Except as specifically provided otherwise in this paragraph, each person publishing such a notice under this section shall do so at his own expense in the legal advertisements section of a newspaper of general circulation (i.e., one that meets the requirements of sections 50.011 and 50.031 of the Florida Statutes) in the county or counties in which the activity will take place or the effects of the Department's proposed action will occur, and shall provide proof of the publication to the Department within seven days of the publication.

State of Florida
Department of Environmental Protection
Notice of Application

The Department announces the receipt of an application from Angelo's Aggregate Materials, Ltd. for a construction/operation permit for the Enterprise Class III Recycling and Disposal Facility Lined Cell 1 (Cell 1L). The proposed project is to construct and operate a new lined Class III landfill and other site amenities at 41111 Enterprise Road, Dade City, Pasco County, and is subject to Department rules.

This application is being processed and is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at the Department of Environmental Protection, Southwest District Office, 13051 N. Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926.