

August 30, 2022
File No. 09199033.31

Mr. Philip Ciaravella
Florida Department of Environmental Protection
Solid Waste Section, MS 4565
2600 Blair Stone Road
Tallahassee, Florida 32399

Subject: Solid Waste Operation Permit Application No. 0038414-019-SO-MM
Leachate Storage Tank Replacement
Response to First Request for Additional Information
Hardee County Landfill

Dear Mr. Ciaravella:

On behalf of the Hardee County Solid Waste Division (County), SCS Engineers (SCS) has prepared this document in response to the Florida Department of Environmental Protection (FDEP) letter requesting additional information dated August 3, 2022.

In the remainder of this document, the FDEP comments are presented in bold italics, followed by the responses. Attachments are provided to replace sections of the application dated June 29, 2022.

Comment 1: Application, Introduction, (pdf page 44 of 300) and Section G, (pdf page 29 of 300). Provide information to demonstrate the proposed above ground leachate storage tanks will comply with the requirements of Paragraph 62-701.400(6)(c). Regulations reference: Paragraph 62-701.400(6)(c), F.A.C. and Application Form Part G.5(b).

Response 1: A response to Comment 1 is presented below.

The Introduction Section of the Engineering Report has been revised as requested based on the regulations reference Paragraph 62-701.400(6)(c), F.A.C. Refer to Attachment A of this document for the replacement Introduction Section of the Engineering Report.

Section G Landfill Construction Requirements of the Engineering Report has been revised as requested based on the regulations reference Paragraph 62-701.400(6)(c), F.A.C. Refer to Attachment B of this document for the replacement Section G of the Engineering Report.

The FDEP Application Form 62-701.900(1), F.A.C. has been revised as requested based on the regulations reference Paragraph 62-701.400(6)(c), F.A.C. Refer to Attachment C of this document for the replacement Sections of FDEP Application Form 62-701.900(1), F.A.C.

A new Solid Waste Director was hired following the submittal of the application package on July 5, 2022. Refer to Attachment D of this document for the revised sections of the Engineering Report listing Ryan Sonnenberg as the designated responsible person for the Hardee County Landfill.



Should you have any questions regarding the information presented in this application, please do not hesitate to contact either of the undersigned.

Sincerely,



Shane R. Fischer, P.E.
Vice President/Office Manager
SCS Engineers

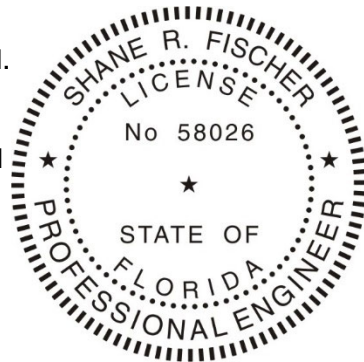


Sara Perez Lopez
Staff Professional
SCS Engineers

cc: Christopher Simpron, Hardee County
Ryan Sonnenberg, Hardee County
Ofelia Reyna, Hardee County

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

Revised Introduction Section of the Engineering Report

INTRODUCTION

SCS Engineers (SCS), in conjunction with Hardee County (County), has prepared this Intermediate Operation Permit Modification Report (Report) for the Hardee County Class I Landfill (Landfill). The proposed modification will involve replacement of the two existing leachate Above Ground Storage Tanks (AST) located east of Phase II Section I. The two proposed replacement AST will be of equal or greater storage capacity and will satisfy the design requirements listed in 62-701.400(6)(c), Florida Administrative Code (F.A.C.). Only one AST will be replaced at a time to ensure one remains in service at all times. No major modifications to the existing control panels, underground piping, or electrical infrastructure are anticipated or proposed at this time as part of this application.

The existing open top, bolted steel AST were permitted by the Florida Department of Environmental Protection (FDEP) on December 18, 1998 through Permit No. 38414-001-SC. The two primary AST have a diameter of 29 feet, a height of 16 feet, and a storage capacity of 79,000 gallons. The primary AST are held within secondary containment AST that have a diameter of 42 feet and a height of 8 feet. Each secondary containment AST has a storage capacity of 87,000 gallons, which is equal to 110% of the primary AST volume. Leachate from Phase I, Phase II Section I, and Phase II Section II is routed to one of the two primary containment AST via the existing leachate collection and removal system (LCRS). The AST are pumped on a daily basis and the evacuated leachate loads are transported to the City of Wauchula Municipal Wastewater Treatment Plant via haul trucks.

The proposed replacement of the two leachate AST will be conducted using ~~is proposed to be~~ a design/build project by the County. Pending approval of this Intermediate Operation Permit Modification by the Department, the County will issue a request for proposal (RFP) to solicit bids from qualified firms to conduct the work. Technical specifications for the replacement AST will not be included as part of this submission as the design work will be finalized by the contractor that is awarded the work. To ensure the replacement AST continue to satisfy all applicable design criteria and performance standards, the RFP will contain language specifying the proposed AST must meet or exceed requirements listed in 62-701.400(6)(c), F.A.C.

Per 62-701.400(6)(c), F.A.C., the new AST are subject to the following requirements:

- The AST will be constructed of concrete, steel, reinforced plastic, polyethylene, or fiberglass.
- The AST will be supported on a well-drained, stable foundation. Currently the existing foundations are proposed to be reused for the new AST. If during the design/build process it is determined the existing concrete foundations need to be replaced or enhanced, the required design and construction work will be conducted. New or enhanced foundations, if required, will be sufficient to support the AST.
- The new AST will not be constructed so the bottom of steel AST would rest on earthen material. The new AST will be placed on the existing concrete foundations or, if required, will be placed on new or enhanced concrete foundations.
- If the AST for the project are chosen to be steel, the exterior surfaces will be protected from the weather by a primer coat, a bond coat, and two or more final coats of paint or other surface coating system designed to prevent corrosion and deterioration. The interior of the

AST will consist of a material, or will be lined with a material, resistant to the leachate being stored.

- The AST will have a secondary containment system with a design volume of 110 percent of the volume of either the largest tank within the containment system or the total volume of all interconnected tanks, whichever is greater.
- The AST secondary containment system will be constructed of materials compatible with the landfill leachate stored.
- The AST will have a secondary containment area to contain and remove stormwater. Provisions will be included for the removal of accumulated precipitation and be initiated within 24 hours or when 10 percent of the storage capacity is reached; whichever occurs first. The AST will be pumped on a daily basis and the evacuated leachate/stormwater loads disposed in accordance with the requirements of subsection 62-701.400(9), F.A.C.
- The AST will be equipped with an overflow prevention system which may include level sensors and gauges, high level alarms, or automatic shutoff controls. The overflow control equipment will be inspected weekly by the County to ensure it is in good working order.

The County will conduct the following activities:

- Weekly inspection of the AST overflow prevention system and exposed AST exteriors for leaks, corrosion, and maintenance deficiencies.
- Conduct an interior inspection of the AST when a tank is drained or at a minimum of every three years.
- If an inspection reveals a tank or equipment deficiency, leak, or other deficiency which could result in failure of a tank to contain the leachate, remedial measures will be taken immediately to eliminate the leak or correct the deficiency.
- Inspection reports will be maintained at the facility scalehouse and made available to the Department upon request for the lifetime of the AST system.

This Report has been prepared to comply with applicable Sections of Rule 62-701, F.A.C. The Report is divided into Sections following 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), F.A.C., included at the beginning of the submittal package.

Explanations are provided within the Report as necessary within the corresponding Section/Parts as listed in FDEP Form 62-701.900(1). Please note the Section/Parts marked as “No Change (N/C)” or “Not Applicable (N/A)” (i.e., those related to previous investigations, design, and/or analyses) have been submitted to the Department in previous application submittals and are considered still valid for this Report. When applicable, sections of FDEP Form 62-701.900(1) marked as N/C are incorporated herein by referencing previously submitted documents on file with FDEP.

ATTACHMENT B

**Revised Section G Landfill Construction Requirements
of the Engineering Report**

SECTION G

LANDFILL CONSTRUCTION REQUIREMENTS

No changes are proposed to the horizontal or vertical extents of the Landfill disposal areas as part of this Report. Information was previously supplied to the Department with the *Hardee County Class I Landfill Phase II Section II Expansion Application for Construction*, dated August 31, 2012, prepared by SCS.

G.1 PLANNED CONSTRUCTION AND CLOSURE

No changes are proposed to the requirements of this Part through this Report.

G.2 LANDFILL LINER REQUIREMENTS

No changes are proposed to the requirements of this Part through this Report.

G.3 LEACHATE COLLECTION AND REMOVAL SYSTEM (LCRS)

No changes are proposed to the requirements of this Part through this Report.

G.4 LEACHATE RECIRCULATION

No changes are proposed to the requirements of this Part through this Report.

G.5 LEACHATE STORAGE TANK AND SURFACE IMPOUNDMENTS

The Landfill currently stores leachate in two steel AST with a capacity of 79,000 gallons each.

G.5.a Surface Impoundment Requirements

Leachate surface impoundments ~~and underground leachate storage tanks~~ are not used at the Landfill. Therefore, the requirements listed in 62-701.400(6)(b, c), F.A.C. for G.5.a(1) through G.5.a(6) have been marked as “Not Applicable”.

G.5.b Above-ground Leachate Storage Tanks

The proposed Intermediate Operation Permit Modification will involve replacement of the two existing leachate AST located east of Phase II Section I. The existing primary and secondary containment AST will be replaced with two AST of equal or greater storage capacity and will satisfy the design requirements listed in 62-701.400(6)(c), F.A.C. Only one AST will be replaced at a time to ensure one remains in service at all times. No major modifications to the existing control panels, underground piping, or electrical infrastructure are anticipated or proposed at this time as part of this application.

The proposed replacement of the two leachate AST will be conducted using ~~is proposed to be~~ a design/build project by the County. Pending approval of this Intermediate Operation Permit Modification by the Department, the County will issue a RFP to solicit bids from qualified firms to conduct the work. Technical specifications for the replacement AST will not be included as part of this submission as the overall design will be finalized by the contractor that is awarded the work. To ensure the replacement AST continue to satisfy all applicable design criteria and performance

standards, the RFP will contain language specifying the proposed AST must meet or exceed requirements listed in 62-701.400(6)(c), F.A.C.

In accordance with Rule 62-701.610(4), F.A.C., a signed, dated, and sealed certificate of closure construction completion by the Engineer-of-Record will be submitted to FDEP upon construction completion.

G.5.b(1) Describe Tank Materials of Construction and Foundation Sufficient to Support Tank

The AST will be constructed of concrete, steel, reinforced plastic, polyethylene, or fiberglass.

The AST will be supported on a well-drained, stable foundation. Currently the existing foundations are proposed to be reused for the new AST. If during the design/build process it is determined the existing concrete foundations need to be replaced or enhanced, the required design and construction work will be conducted. New or enhanced foundations, if required, will be sufficient to support the AST.

G.5.b(2) Describe Procedures for Cathodic Protection for the Tank, if Needed

The new AST will not be constructed so the bottom of steel AST would rest on earthen material. The new AST will be placed on the existing concrete foundations or, if required, will be placed on new or enhanced concrete foundations. Therefore, a cathodic protection system will not be required and this item has been identified as "Not Applicable".

G.5.b(3) Describe Exterior Painting and Interior Lining of the Tank to Protect it from Weather and the Leachate Stored

If the AST for the project are chosen to be steel, the exterior surfaces will be protected from the weather by a primer coat, a bond coat, and two or more final coats of paint or other surface coating system designed to prevent corrosion and deterioration. The interior of the AST will consist of a material, or will be lined with a material, resistant to the leachate being stored.

G.5.b(4) Secondary Containment Design Capacity and Compatibility of Materials of Construction

The AST will have a secondary containment system with a design volume of 110 percent of the volume of either the largest tank within the containment system or the total volume of all interconnected tanks, whichever is greater.

The AST secondary containment system will be constructed of materials compatible with the landfill leachate stored.

G.5.b(5) Designed to Remove and Dispose of Stormwater from the Secondary Containment System

The AST will have a secondary containment area to contain and remove stormwater. Provisions will be included for the removal of accumulated precipitation and be initiated within 24 hours or when 10 percent of the storage capacity is reached; whichever occurs first. The AST are pumped on a daily basis and the evacuated leachate/stormwater loads are transported to the City of Wauchula

Municipal Wastewater Treatment Plant via haul trucks in accordance with the requirements of subsection 62-701.400(9), F.A.C.

G.5.b(6) Overfill Prevention System

The AST will be equipped with an overfill prevention system which may include level sensors and gauges, high level alarms, or automatic shutoff controls. The overfill control equipment will be inspected weekly by the County to ensure it is in good working order.

G.5.b(7) Inspections, Corrective Action, and Reporting Requirements

The County will conduct the following activities:

- Weekly inspection of the AST overfill prevention system.
- Weekly inspection of exposed AST exteriors for leaks, corrosion, and maintenance deficiencies.
- Conduct an interior inspection of the AST when a tank is drained or at a minimum of every three years.
- If an inspection reveals a tank or equipment deficiency, leak, or other deficiency which could result in failure of a tank to contain the leachate, remedial measures will be taken immediately to eliminate the leak or correct the deficiency.
- Inspection reports will be maintained at the facility scalehouse and made available to the Department upon request for the lifetime of the AST system.

G.5.c Underground Leachate Storage Tanks

Underground leachate storage tanks are not used at the Landfill. Therefore, the requirements listed in 62-701.400(6)(b, c), F.A.C., for G.5.c(1) through G.5.a(4) have been marked as “Not Applicable”.

G.6 LINER SYSTEMS CQA

No changes are proposed to the requirements of this Part through this Report.

G.7 SOIL LINER CQA

No changes are proposed to the requirements of this Part through this Report.

G.8 SURFACE WATER MANAGEMENT SYSTEMS

No changes are proposed to the requirements of this Part through this Report.

G.9 GAS CONTROL SYSTEMS

No changes are proposed to the requirements of this Part through this Report.

G.10 LANDFILLS DESIGNED IN GROUNDWATER

No changes are proposed to the requirements of this Part through this Report.

ATTACHMENT C

Revised Sections of FDEP Application Form 62-701.900(1), F.A.C.

8. Applicant name (operating authority): Hardee County Solid Waste Department
Mailing address: 685 Airport Road Wachula FL 33873
Street or P.O. Box City State Zip
Contact person: Ryan Sonnenberg Telephone: (863) 773-5089
Title: Solid Waste Director
ryan.sonnenberg@hardeecounty.net
E-Mail address (if available)

9. Authorized agent/Consultant: SCS Engineers
Mailing address: 3922 Coconut Palm Drive, Suite 102 Tampa FL 33619
Street or P.O. Box City State Zip
Contact person: Shane R. Fischer, P.E. Telephone: (813) 804-6714
Title: Office Manager/Project Director
sfischer@scsengineers.com
E-Mail address (if available)

10. Landowner (if different than applicant): Same as applicant
Mailing address: _____
Street or P.O. Box City State Zip
Contact person: _____ Telephone: (____) _____

E-Mail address (if available)

11. Cities, towns, and areas to be served:
Hardee County, including its municipalities.

12. Population to be served:
Current: 27,807 Five-Year Projection: 27,914

13. Date site will be ready to be inspected for completion: FDEP to be contacted

14. Expected life of the facility: 22 years

15. Estimated costs:
Total Construction: \$ N/A Closing Costs: \$ N/A

16. Anticipated construction starting and completion dates:
From: TBD To: TBD

17. Expected volume or weight of waste to be received:
_____ yds³/day 67.10 tons/day _____ gallons/day

LOCATION

PART G CONTINUED

- S _____ N/A N/C
- S _____ N/A N/C
- S _____ N/A N/C
- S _____ N/A N/C
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- (5) Design calculations to demonstrate minimum two feet of freeboard will be maintained;
- (6) Procedures for controlling vectors and off-site odors;
- b. Above-ground leachate storage tanks; (62-701.400(6)(c), FAC)
 - (1) Describe tank materials of construction and ensure foundation is sufficient to support tank;
 - (2) Describe procedures for cathodic protection for the tank, if needed;
 - (3) Describe exterior painting and interior lining of the tank to protect it from the weather and the leachate stored;
 - (4) Describe secondary containment design to ensure adequate capacity will be provided and compatibility of materials of construction;
 - (5) Describe design to remove and dispose of stormwater from the secondary containment system;
 - (6) Describe an overflow prevention system, such as level sensors, gauges, alarms, and shutoff controls to prevent overflowing;
 - (7) Inspections, corrective action, and reporting requirements;
 - (a) Weekly inspection of overflow prevention system;
 - (b) Weekly inspection of exposed tank exteriors;
 - (c) Inspection of tank interiors when tank is drained, or at least every three years;
 - (d) Procedures for immediate corrective action if failures detected;
 - (e) Inspection reports available for Department review;
- c. Underground leachate storage tanks; (62-701.400(6)(d), FAC)


Revised 8/30/2022

PART S. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

1. Applicant:

The undersigned applicant or authorized representative of Hardee County Solid Waste Department

_____ is aware that statements made in this form and attached information are an application for a modification to the Operation permit from the Florida Department of Environmental Protection, and certifies that the information in this application is true, correct, and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility.


Signature of Applicant or Agent

Ryan Sonnenberg, Solid Waste Director
Name and Title (please type)

Ryan.sonnenberg@hardeecounty.net
E-Mail Address (if available)

685 Airport Road
Mailing Address

Wauchula, Florida 33873
City, State, Zip Code

(863) 773-3272
Telephone Number

Date: August 30, 2022

Attach letter of authorization if agent is not a government official, owner, or corporate officer.

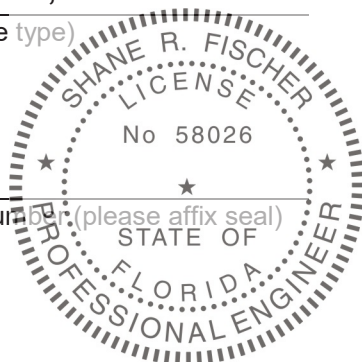
2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, Florida Statutes):

This is to certify that the engineering features of this solid waste management facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.

Signature

Shane R. Fischer, P.E.
Name and Title (please type)

58026
Florida Registration Number (please affix seal)



3922 Coconut Palm Drive, Suite 102
Mailing Address

Tampa, FL 33619
City, State, Zip Code

sfischer@scsengineers.com
E-Mail Address (if available)

(813) 804-6714
Telephone Number

Date: August 30, 2022

THIS ITEM HAS BEEN DIGITALLY SIGNED AND SEALED BY SHANE R. FISCHER, P.E. 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.

Revised 8/30/2022

ATTACHMENT D

**Revised Sections in the Engineering Report Listing the Designated Responsible
Person**

GENERAL INFORMATION

OVERVIEW

This Section presents and addresses general requirements in Chapter 62-701, F.A.C., which are not addressed in other Sections or Appendices of this Report.

LOCATION

The Hardee County Landfill is located at 685 Airport Road, approximately one mile north of State Road 636 in Wauchula, Florida. The site property lies within Section 35, Township 33 South, Range 25 East in Hardee County, Florida at Latitude 27°34'17"N, Longitude 81°46'58"W.

SITE DESCRIPTION

The Landfill and ancillary operations are permitted by the FDEP as a Class I landfill under Operation Permit Number 38414-016/SO/01 with an expiration date of November 8, 2033. The Landfill has been owned and operated by the Hardee County Board of County Commissioners (BOCC) since 1981. The Landfill facility encompasses approximately 116 acres including Phase I, Phase II Section I, and Phase II Section II, two leachate AST, a household hazardous waste collection center (HHWCC), scrap metal and white goods storage areas, a yard trash processing area, a Material Recovery Facility (MFR), and related appurtenances.

Closure construction of the Phase I landfill was completed by the County under Construction Permit No. 38414-012-SF/01. The County received FDEP approval of Phase I closure construction on January 3, 2012. Waste was last received on October 26, 2010. The Phase II Section I and Phase II Section II disposal areas are the current active filling areas. The Landfill disposal areas consist of the following:

- Phase I - Approximately 12.31 acres which closure construction has been completed and approved is no longer available for active waste filling (other than the Phase II Section II disposal area "piggy-back" along the western sideslope).
- Phase II Section I - Approximately 6.29 acres
- Phase II Section II - Approximately 6.18 acres consisting of the northern portion (approximately 2.33 acres), the center portion (approximately 2.22 acres), and the southern portion (approximately 1.63 acres).

DISPOSAL FACILITY GENERAL INFORMATION

See Application Form (page 6 of 36) for this information. The designated responsible person for the Landfill is:

~~Christopher Simpson~~ Ryan Sonnenberg, ~~Public Works~~ Solid Waste Director
685 Airport Road
Wauchula, FL 33873

Phone: (863) ~~773-5089~~~~773-3272~~

Email: ~~Ryan.sonnenberg@hardeecounty.net~~ ~~Christopher.Simpron@hardeecounty.net~~

The information required for Section B - Disposal Facility General Information for the Landfill has been provided on pages 6, 7, 8, and 9 of Form 62-701.900(1), titled State of Florida Department of Environmental Protection Application to Construct, Operate, Modify or Close a Solid Waste Management Facility.

Excluding Hardee County holidays, the Landfill is open for disposal of solid waste Monday through Friday between the hours of 7:30 a.m. and 5:00 p.m. and on Saturday between the hours of 7:30 a.m. and 12:00 p.m.

In accordance with Title XIV Chapter 218, F.A.C. relating to "Financial Matters Pertaining to Political Subdivisions,"

- 218.075 Reduction or waiver of permit processing fees - Notwithstanding any other provision of law, the Department of Environmental Protection and the water management districts shall reduce or waive permit processing fees for counties with a population of 50,000 or less on April 1, 1994, until such counties exceed a population of 75,000 and municipalities with a population of 25,000 or less, or any county or municipality not included within a metropolitan statistical area. Fee reductions or waivers shall be approved on the basis of fiscal hardship or environmental need for a particular project or activity. The governing body must certify that the cost of the permit processing fee is a fiscal hardship due to one of the following factors:
 1. Per capita taxable value is less than the statewide average for the current fiscal year;
 2. Percentage of assessed property value that is exempt from ad valorem taxation is higher than the statewide average for the current fiscal year;
 3. Any condition specified in s. 218.503(1) which results in the county or municipality being in a state of financial emergency;
 4. Ad valorem operating millage rate for the current fiscal year is greater than 8 mills; or
 5. A financial condition that is documented in annual financial statements at the end of the current fiscal year and indicates an inability to pay the permit processing fee during that fiscal year.
- The permit applicant must be the governing body of a county or municipality or a third party under contract with a county or municipality and the project for which the fee reduction or waiver is sought must serve a public purpose. If a permit processing fee is reduced, the total fee shall not exceed \$100.

Please refer to Section D.5 for an additional explanation regarding the permit application fee for this Report.

SECTION D

SOLID WASTE FACILITY PERMITTING REQUIREMENTS, GENERAL

D.1 APPLICATION FORM AND SUPPORTING DOCUMENTS

Rule 62-701.320(5)(a), F.A.C, 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, P.E., 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 as required by Rule 62-701.320(7)(a), F.A.C.

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, P.E., a licensed Professional Engineer in the State of Florida (License No. 58026) as required by Rule 62-701.320(7)(b), F.A.C. and is attached at the beginning of this Report. In addition, the Form has been signed and dated by ~~Christopher Simpson~~ Ryan Sonnenberg, ~~Public Works~~ Solid Waste Director, designated responsible person for the Hardee County Landfill.

D.5 PERMIT FEE

Per the Departments email dated March 6, 2013 to SCS previously submitted with the *Hardee County Landfill Operation Permit Renewal Application*, dated March 12, 2013, prepared by SCS and on file with the Department, the following protocol has been established regarding Permit Fees. Therefore, no fee has been provided with this Report for the Intermediate Operation Permit Modification application.

- “For the purpose of consistency, OGC and I reviewed Section 218.075, Florida Statutes which selectively allows for local government fee waivers for environmental permits. The attached guidance is the outcome of that review. The bottom line is that we’ll provide fee waivers (\$0 fee) for the 30 counties listed at the end of the guidance, and the local governments within those 30 counties. Any of the other fee reductions/waivers should be granted on a case-by-case basis, and only after the county/local government provides the Department with a certification that they meet the hardship criteria outlined within the same statute.”

D.6 ENGINEERING REPORT

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

D.7 OPERATION PLAN AND CLOSURE PLAN

Per Rule 62-701.320(7)(e)1, F.A.C. an updated Operation Plan is provided in **Attachment A** of this Report. The updates are minor administrative modifications to better align with current site conditions. 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 Operation Plan submitted by SCS on September 6, 2019. 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. The 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. No significant changes to the previously submitted Closure Plan are proposed as part of this Report.

D.8 CONTINGENCY PLAN

No changes to the previously authorized Contingency Plan are proposed as part of this Report.

D.9 FACILITY PLANS AND DRAWINGS

The Operation Drawings titled Hardee County Landfill Phase II Section II Construction/Operations Drawings, last revised on June 28, 2013, remain valid and are provided in Appendix R of the Operation Plan (**Attachment A**).

A new figure (**Figure 1**) illustrating the dimensions and storage capacity of the proposed replacement AST is being submitted with this Report. Upon construction completion, the Department will be provided with record drawings for the two new AST.

D.9.a Regional Map or Plan

No changes are proposed to the requirements of this Part through this Report.

D.9.b Vicinity Map or Aerial Photograph

No changes are proposed to the requirements of this Part through this Report.

D.9.c Site Plan

No changes are proposed to the requirements of this Part through this Report.

D.9.d Supporting Details

No changes are proposed to the requirements of this Part through this Report.

D.10 PROOF OF PROPERTY OWNERSHIP

No changes are proposed to the requirements of this Part through this Report.

D.11 WASTE REDUCTION AND RECYCLING GOALS

No changes are proposed to the requirements of this Part through this Report.

D.12 HISTORY AND DESCRIPTION OF ENFORCEMENT HISTORY

Below is a summary of enforcement history for the applicant for the 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 concede to FDEP's data.

The County received a Warning Letter (#WL94-0011SW25SWD) on July 22, 1994, due to a violation of Rule 62-701.500(7)(e), F.A.C., specifically:

- “Inadequate daily cover was observed on the MSW bale working face. Plastic tarps are being used but they only partially cover the bales. It appears that cover material is being placed on top of these tarps.”

The County received a Warning Letter #WL19-131SW25SWD) on December 23, 2019, due to violations of chapter 403, FS, and chapter 62-701, F.A.C., specifically:

- “The current filling operations do not conform with the authorized sequence of fill.”
- “The initial cover on the southern portion of Phase II, Section II is inadequate and waste is exposed.”
- “The current litter policing methods are insufficient.”
- “The western side slope of Phase I is eroded.”
- “The leachate collection and removal system is not maintained and operated as required.”
- “The mixing of stormwater and leachate is not minimized or prevented.”
- “The asbestos waste shipment records were unavailable for review during the inspection.”
- “The annual fire safety survey was unavailable for review during the inspection.”

The County entered into a consent order (OGC File No.: 20-1246) on August 25, 2020, due to violation of Specific Condition C.12.a. of Solid Waste Operation Permit No. 38414- 017-SO-MM, specifically:

- “Failure to properly maintain its leachate control system.”

The provisions of the Consent Order were met on July 9, 2021. The Consent Order was closed by the Department on July 27, 2021.

The County received a Warning Letter (#WL20-200SW25SWD) on December 11, 2020, due to violations of chapter 403, FS, and chapter 62-701, F.A.C., specifically:

- “The current filling operations do not conform with the authorized sequence of fill.”
- “The initial cover on the center portion of Phase II Section II is inadequate and waste is exposed.”
- “The intermediate cover on the south portion of Phase II Section II is inadequate.”
- “The current litter policing methods are insufficient.”
- “A leachate discharge from the leachate collection and removal system was observed.”

- “Leachate seeps were observed within the landfill.”
- “Ponding of leachate was observed within the landfill.”
- “The mixing of stormwater and leachate is not minimized or prevented.”
- “The waste compactor was not functional during the inspection.”

The County received a Warning Letter #WL21-166SW25SWD) on November 23, 2021, due to violations of chapter 403, FS, and chapter 62-701, F.A.C., specifically:

- “The current filling operations do not conform with the authorized sequence of fill.”
- “The slopes within the working face and in adjacent areas are not compacted to a 3:1 slope.”
- “The initial cover within and near the working face is inadequate.”
- “The intermediate cover on Phase I is inadequate.”
- “The current litter policing methods are insufficient.”
- “The leachate collection system is not functioning or operating as designed.”
- “Leachate seeps were observed within the landfill.”
- “Ponding of leachate was observed within the landfill.”
- “The mixing of stormwater and leachate is not minimized or prevented.”
- “Small amounts of unacceptable wastes, including waste tires, were in the active disposal area.”

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

No changes are proposed to the requirements of this Part through this Report.

D. 15 OPERATOR AND SPOTTER TRAINING REQUIREMENTS

In accordance with Rule 62-701.320(15), F.A.C. key supervisory staff at the Landfill have received Landfill Operator Certification Training. As required by Rule 62-701.320(15), F.A.C. a trained operator will be onsite at all times when waste is received at the 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 Landfill and are available for Department inspection.

In order to be considered trained; Operators of the 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 training records have been included in Appendix C of the Operation Plan located in **Attachment A** of this Report.