



# Florida Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

Mr. Bradley S. Arnold,  
County Administrator  
Board of Sumter County Commissioners  
910 North Main Street - RM 201  
Bushnell, Fl. 33513

January 15, 2009

RE: Sumter County C&D Debris Disposal Facility, Sumter County  
Pending Permit No.: 293402-001-SO/22  
WACS Id#: 53008

Dear Mr. Arnold:

This is to acknowledge receipt your permit application, dated December 12, 2008 (received December 17, 2008) to construct, operate and close a construction and demolition debris disposal facility referred to as Sumter County Construction and Demolition Debris Disposal Facility, located at 835 CR 529, Lake Panasoffkee, Florida.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes. Your application for an operation permit is incomplete. This is the Department's first request for information. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

The following information is needed in support of the solid waste permit application [Chapter 62-701, Florida Administrative Code (F.A.C.)].

## GENERAL:

1. The requested information and comments below do not repeat the information submitted by the applicant. However, every effort has been made to concisely refer to the section, page, drawing detail number, etc. where the information has been presented in the original submittal.
2. Please submit 4 copies of all requested information. Please specify if revised information is intended to supplement, or replace, previously submitted information. Please submit all revised plans and reports as a complete package. For revisions to the narrative reports, deletions may be struckthrough (~~struckthrough~~) and additions may be shaded shaded or similar notation method may be used. This format will expedite the review process. Please include the revision date on all revised pages.
3. Please provide a summary of all revisions to drawings, and indicate the revision on each of the applicable plan sheets. Please use a consistent numbering system for drawings. If new sheets must be added to the original plan set, please use the same numbering system with a prefix or suffix to indicate the sheet was an addition, e.g. Sheet 1A, 1B, P1-A, etc.

4. Please be advised that although some comments do not explicitly request additional information, the intent of all comments shall be to request revised calculations, narrative, technical specifications, QA documentation, plan sheets, clarification to the item, and/or other information as appropriate. **Please be reminded that all calculations, evaluations, etc., must be signed and sealed by the registered professional engineer (or geologist as appropriate) who prepared them.**

**General Information, Rule 62-701.320(5), F.A.C.**

1. Permit applications for a solid waste management facility shall include the application, engineering plans and reports, and all supporting information for the proposed construction, operation or closure of the facility. Information in every application shall be of sufficient detail to show how the facility will be constructed, operated, and closed, and how it will be monitored and maintained after closure, in order to comply with the requirements of Chapter 62-701, F.A.C.

a. Please be advised that much of the information provided in this application and supporting documentation appears to be either a resubmittal of the information provided for the pending transfer station permit application or the PCAR associated with the ongoing groundwater investigations at the site. While this information may be descriptive of various aspects of solid waste, management at the facility, it does not provide design or operational information specific to the construction, operation or closure of a C&D debris disposal facility. Please provide a revised application and supporting documentation that meets the requirements of Rules 62-701.320(5), 62-701.300, 62-701.410, and 62-701.730, F.A.C.

b. Other portions of the information submitted (e.g., Section 2) appear to be a reiteration of the Rule. This information does not demonstrate **how** the applicant will construct, operate and close the proposed C&D debris disposal facility in accordance with Department rules. Please provide a revised application and supporting documentation that meets the requirements of Rules 62-701.320(5), 62-701.300, 62-701.410, and 62-701.730, F.A.C.

**General Information, Rules 62-701.320 & 62-701.730 F.A.C.**

2. **Engineering Report, (Section 2) Rules 62-701.320(7)(d) & 62-701.730(2)(a) F.A.C.** Please provide a comprehensive revised Engineering Report and Operation Plan that includes the information requested. Please provide replacement pages with revisions noted (deletions may be struckthrough [~~struckthrough~~] and additions may be underlined [underlined] or a similar method may be used) and each page numbered with the document title and date of revision. This report will be reviewed in its entirety after responses are received.

a. Cover Page. Please provide a cover sheet for the engineering report stating the project title, location, applicant's name, engineer's name, address, signature, date of signature and seal. Please include the Certificate of Authorization for Post, Buckley, Schuh & Jernigan, Inc. on the cover page or document cover.

b. Site Plan. Please provide a site plan that includes the information required by Rule 62-701.730(2)(a), F.A.C.

c. Geotechnical investigation. See Comment #19, below.

d. Hydrogeological investigation. See Comment #18, below.



(Comment #2, cont'd)

- e. Design life and height. Please provide calculations, including references and assumptions, to support the design capacity of 9,000 tons referenced in this section. Please provide calculations, including references and assumptions, supporting the incoming waste projection of 1,200 tons per year and design life of 7.5 years referenced in this section. Please provide a summary of actual waste receipt information for the facility for the past 5 years to support the projected tonnages.
3. **Property Boundary Survey, Legal Description and Topographic Survey (Appendices A and C), Rule 62-701.730(2)(b) F.A.C.** The information provided in these appendices does not appear to be complete. Please provide a boundary survey (signed and sealed by a surveyor), legal description, and topographic survey, of the facility which includes all portions of the property.
4. **Operation Plan (Appendix D), Rules 62-701.320(7)(e), 62-701.730(2)(c), 62-701.730(6), (7), (12), (13), (18), (19), F.A.C.** Please provide an Operations Plan specific to the C&D facility operations. Please provide specific procedures and information to demonstrate that facility operations will comply with the above cited rule sections. See Comment #1, above.
5. **Closure and Long-term Care Plan, Rules 62-701.730(2)(d), (9), (10), & (11) F.A.C.** Please provide specific procedures for closure and long-term care of the facility. Please provide a long-term care plan which details the activities that will be conducted to provide long-term monitoring and maintenance of the facility. Please provide a description of the activity, the frequency, and reporting requirements. See also Comment #6, below
6. **Financial Assurance (Appendix E), Rules 62-701.630, 62-701.730(2)(e) & (11) F.A.C.**
  - a. Please provide cost estimates and third-party quotes, for the loading, hauling and disposal of the maximum quantity of processed and unprocessed materials, unacceptable and special wastes, recyclables, etc., that may be at the facility at any time. The estimates shall be for a third-party performing the work, shall include supporting quotes and shall be signed and sealed by a professional engineer.
  - b. Please provide revised costs that include the costs of irrigation required to establish vegetative cover on the landfill.
  - c. Please provide calculations supporting the quantities used in the cost estimates.
  - d. Please revise the cost estimates to include stormwater system maintenance.
7. **Groundwater Monitoring Plan, Rules 62-701.510, F.A.C. & 62-701.730(4)(b) F.A.C.** Please respond the comments in Mr. John Morris' memorandum dated January 15, 2009, attached.
8. **Stormwater (Appendix F), Rule 62-701.730(5) F.A.C.** Please provide a copy of the stormwater management permit issued by the Department's ERP section that includes the proposed C&D debris disposal activity.
9. **Temporary Storage, Rule 62-701.730(6), F.A.C.** Please provide the maximum storage quantity and time, storage location and method for each special & unacceptable waste. Please specify that storage containers will be properly labeled.

10. **Training, Rules 62-701.730(8) & 62-701.320(15) F.A.C.** Please provide a list of all currently trained C&D spotters and operators employed at the facility. Please specify how these requirements will be met.
11. **Annual Report, Rule 62-701.730(12) F.A.C.** Please specify how the waste origins and quantities will be determined. Please include the reporting requirements in the revised Operations Plan.
12. **Certification, Rules 62-701.730(3)& 62-701.320(9)(a) F.A.C.** Please revise the Operations Plan to specify that certification of construction pursuant to the above cited rule is required to be approved by the Department prior to operation of the facility. Please provide specific procedures, including timeframes, for the construction, certification of construction completion, operation and closure of the facility.
13. **Plans and Drawings, (Appendix A) Rules 62-701.320(7)(f), and 62-701.730(2)(a), F.A.C.** 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. Please provide detailed design plans for the facility prepared under the direction of and signed and sealed by a professional engineer registered in the State of Florida. Please provide the following additional information and revisions to the plans.
  - a. Please provide sequence of filling plans, including details and the "phased closure" referenced in Section 2 of the Engineering Report.
  - b. Sheet C-3. See Comment #1.b. & #9, above.
  - c. Sheet C-4. This drawing does not show dimensions consistent figures presented in Section 2 of the application or other sheets in the Plan set. Please verify the scale used on this sheet. Please specify the date of the contours shown on this sheet, and provide a signed sealed copy of the topographic survey that supports the contours on this sheet. See also Comment #3, above.
  - d. Sheet C-5. Please provide cross-sections that includes each lift in the sequence of filling. Please include procedures for applying intermediate cover, and removing the existing liners in the Operations Plan.
14. **Contingency Plan, Rule 62-701.320(7)(e)(2) F.A.C.** Please provide a contingency plan specific to facility operations pursuant to the above cited rule.
15. **Prohibitions, Rule 62-701.300, F.A.C.** Please provide specific information that demonstrates how the facility will comply with the prohibitions listed in this section.
16. **History of Enforcement Rule 62-701.320 (7)(i), F.A.C.** Please provide a history and description of any enforcement actions relating to the applicant regarding solid waste management facilities.
17. **Notice of Application, Rule 62-701.320(8), F.A.C.** Please provide proof of publication of the attached Notice of Application to the Department.



18. **Hydrogeological Investigation, Rule 62-701.410(1), F.A.C. (Appendix B)**

- a. Please provide the cover page for the PCAR submitted that includes the date and preparer.
- b. Please respond the comments in Mr. John Morris' memorandum dated January 15, 2009, attached.

19. **Geotechnical Investigation, Rule 62-701.410(2), F.A.C. (Appendix B)**

- a. Please provide a geotechnical investigation that meets the requirements of this Rule, including but not limited to foundation analyses, sinkhole investigation, etc. The PCAR provided does not include the geotechnical information required.

**The following comment is for information only at this time and does not require an immediate response:**

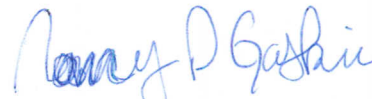
1. The transmittal letter and portions of the Engineering Report and Appendix B indicate that the lined cell "was constructed [or operated] in 1989 to hold compost." As the lined "emergency storage cell" was constructed and operated to store shredded municipal solid waste prior to composting, and not finished compost, this statement is factually incorrect.

This staff assessment is preliminary and is designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the department and may be subject to revision pursuant to additional information and further review.

Please respond **by March 9, 2009**, responding to all of the information requests and indicating when a response to any unanswered questions will be submitted. If the response will require longer than **the date noted above**, you should develop an alternate specific time table for the submission of the requested information for Department review and consideration. Pursuant to the provisions of Rule 62-4.055(1), F.A.C., if the Department does not receive a timely, complete response to this request for information the Department may issue a final order denying your application. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant may reapply as soon as the requested information is available.

**Due to the magnitude of the above-comments, the Department recommends a meeting to discuss the deficiencies with the applicant and applicant's consultant prior to submitting the response to this letter.** You are requested to submit 4 copies of your responses to this letter together, as one complete package. Please contact me at (813)632-7600 ext. 375 or [nancy.gaskin@DEP.state.fl.us](mailto:nancy.gaskin@DEP.state.fl.us) to schedule this meeting or if you have any questions.

Sincerely,



Nancy D. Gaskin  
Solid Waste Program  
Southwest District

ndg  
attachment  
cc (via email only):

Joe Miller, P.E., PBSJ, [jlmiller@pbsj.com](mailto:jlmiller@pbsj.com)  
Aimee Webb, Sumter County Development, [Aimee.Webb@sumtercountyfl.gov](mailto:Aimee.Webb@sumtercountyfl.gov)  
Fred Wick/Frank Hornbrook, FDEP Tallahassee  
Susan Pelz, P.E., FDEP Tampa  
John Morris, P.G., FDEP Tampa  
Al Gagne/Douglas Hyman, P.E., FDEP Tampa ERP

State of Florida  
Department of Environmental Protection  
Notice of Application

The Department announces the receipt of an application for permit from the Board of Sumter County Commissioners, Bradley S. Arnold, County Administrator, for the construction, operation, and closure, of a C&D debris disposal facility, referred to as the Sumter County Construction and Demolition Debris Disposal Facility, located at, 835 CR 529, Lake Panasoffkee, Florida, 33538.

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, Temple Terrace, Fl. 33637-0926.



# Memorandum

# Florida Department of Environmental Protection

**TO:** Nancy Gaskin  
**FROM:** John R. Morris, P.G. *JRM*  
**DATE:** January 15, 2009  
**SUBJECT:** Proposed Sumter County C&D Debris Disposal Facility  
Permit Application #293402-001-SO  
Hydrogeologic and Monitoring Review Comments  
**cc:** Susan Pelz, P.E.

I have reviewed portions of the materials submitted to the Department in support of the referenced application for permit for the proposed Sumter County C&D Debris Disposal Facility that were prepared by PBS&J, on behalf of Sumter County Public Works Department, received December 17, 2008. The materials that I reviewed were related to the hydrogeologic investigation and monitoring plan that had been prepared for the proposed C&D disposal facility, and included the following:

- Document entitled "Sumter County Construction & Demolition Debris Disposal Facility, Permit Application," dated December 12, 2008, including:
  - Transmittal letter prepared by PBS&J dated December 12, 2008
  - Section 1 – DEP Form #62-701.900(6), signed/sealed November 14, 2008;
  - Section 2 – Engineering Report, dated November 28, 2008
  - Appendix A – Site Drawings Set, prepared by PBS&J, dated October 2008, signed/sealed December 16, 2008
  - Appendix B – Geotechnical Investigation and Hydrogeological Investigation Report

Additional information is needed to evaluate the adequacy of the hydrogeological investigation and the proposed monitoring plan. Please have the applicant address the following comments that refer to the permit application form and sections of the referenced submittals. Please have the applicant provide revised submittals, or replacement pages to the submittals, that use a ~~strike-through~~ and underline format, or similar format, to facilitate review. Please also have the applicant include the revision date as part of the header/footer for all revised or replacement pages (including text, figures, tables, forms appendices and site plans).

## PERMIT APPLICATION – DEP FORM NO. 62-701.900(6)

### PART B – ADDITIONAL INFORMATION

1. **B.1.a.: Engineering Report, Site Plan** (Rule 62-701.730(2)(a), F.A.C.). Section B.1.a., of the Engineering Report referred to the Site Plan provided on the construction drawings that were submitted in Appendix A. Please submit revisions to the drawings submitted in Appendix A to address the following items:

#### Sheet 3/6 (Drawing C3)

a. This sheet does not provide all of the locations shown on Cross Section A-A' as presented on Sheet 6/6 (Drawing C6). Please submit revisions to this sheet to present the locations and identification numbers for omitted wells MW-2A, MW-4A and MW-4B.

#### Sheet 6/6 (Drawing C6)

b. The "Ground Water Monitoring Well Detail" presented on this sheet indicated a 5-foot well screen length, however it does not depict the top of screen and bottom of screen elevations for proposed wells MW-12 and MW-13. Please submit revisions to this detail to provide the technical justification of well screen locations and screen length to comply with the requirements of Rule 62-701.510(3)(d)4, F.A.C.

c. The "Ground Water Monitoring Well Detail" presented on this sheet does not depict the anticipated lithology at the locations of proposed wells MW-12 and MW-13. Please submit revisions to this detail to show the extent of the confining unit that separates the surficial sandy sediments from the underlying limestone sediments to demonstrate that the proposed wells screens will not act as conduits through the confining layer to comply with the requirements of Rule 62-701.510(3)(d)4, F.A.C.

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(Comment #1 – Engineering Report, Site Plan, continued)

d. Notes #1 and #2 of the “Construction Notes for Monitoring Wells” text presented on this sheet referenced work related to abandonment and installation of monitoring wells, however it does not appear that any existing wells are proposed to be abandoned as part of the work associated with the C&D facility. Please review this apparent inconsistency and submit revisions to these notes, as appropriate.

e. The last sentence of Note #2 of the “Construction Notes for Monitoring Wells” text presented on this sheet described the proposed methodology for monitor well abandonment as backfilling with clean sand. This proposed methodology does not appear to be appropriate for the hydrogeology of the Sumter County closed Class I landfill and proposed C&D disposal facility where the monitoring wells penetrate the confining unit between the surficial sandy sediments and underlying limestone sediments (see comment #1.c., above). Depending on the response to comment #1.d., above, regarding the need for the “Construction Notes for Monitoring Wells” text to include discussion of monitoring well abandonment, please either delete the last sentence of Note #2 or submit revisions to the last sentence of Note #2 to indicate monitoring wells shall be abandoned by pumping a sufficient volume of grout into the bottom of the well until surface returns are observed.

f. Note A of the “Construction Notes for Monitoring Wells” text presented on this sheet omitted the documentation of monitoring well locations in degrees, minutes and seconds of latitude and longitude as required by Rule 62-701.510(3)(d)1, F.A.C. Please submit revisions to this note to address this omission. Please submit additional revisions to this note to indicate that documentation of monitoring well construction details shall also include the submittal of a completed DEP Form #62-522.900(3) for each well location.

g. Note B of the “Construction Notes for Monitoring Wells” text presented on this sheet omitted the analysis of the parameters listed by Rule 62-701.510(8)(d), F.A.C., as part of the establishment of “background” water quality as required by Rule 62-701.730(4)(b)5, F.A.C. Please submit revisions to this note to address this omission.

h. Section A-A’ (Generalized Geologic Conditions Along Cross Section A-A’, Sumter County Closed Landfill) presented on this sheet was referenced as Figure 5 (dated January 5, 2004) from an un-named document prepared by The Colinas Group. Section B.1.c., of the Engineering Report referenced the Preliminary Contamination Assessment Report completed by The Colinas Group for the Sumter County closed landfill (excerpts provided in Appendix B). Section B.1.c., of the Engineering Report also referenced the construction details for Well MW-9A that were provided in Appendix B. Review of the Department’s files indicated that the document entitled “Preliminary Contamination Assessment Report (PCAR), Sumter County Closed Landfill, Sumter County, Florida” [referred to as the “**PCAR document**”] prepared by The Colinas Group, dated January 2005, signed/sealed January 21, 2005, was received by the Department on January 24, 2005. It is noted that Cross Section A-A’ was presented as Figure 4 in the PCAR document, while Cross Section A-A’ was presented as Figure 5 in Appendix B of the Engineering Report, and Cross Section A-A’ was referenced as Figure 5 on Sheet 6/6. It is further noted that while Figure 4 from the PCAR document and Figure 5 provided in Appendix B of the Engineering Report appeared to present identical information for Cross Section A-A’, the detail provided on Sheet 6/6 presented the following differences:

- Well MW-9A total depth depicted at ~32 ft NGVD on Sheet 6/6, depicted at ~24 ft NGVD on Figures 4 and 5
- Well MW-9A screened interval depicted at ~32 to 42 ft NGVD on Sheet 6/6, depicted at ~24 to 34 ft NGVD on Figures 4 and 5

Additionally, the construction details for well MW-9A presented on Cross Section A-A’ on Sheet 6/6 appear to be inconsistent with the Monitor Well Completion Report and the Well Completion Log for well MW-9A provided in Appendix B of the Engineering Report. Please review the apparent inconsistencies depicted on Section A-A’ presented on Sheet 6/6 and submit revisions, as appropriate.



(Comment #1 – Engineering Report, Site Plan, continued)

i. Section A-A' (Generalized Geologic Conditions Along Cross Section A-A', Sumter County Closed Landfill) depicted the bottom of the "lined cell (unused)" at an elevation of ~62 ft NGVD, while the "Existing Grading Plan" detail provided on Sheet 4/6 (Drawing C4) depicted the bottom of the "existing emergency lined cell (empty)" at an elevation slightly below ~54 ft NGVD. Please review the apparent inconsistencies regarding the bottom elevation of the lined cell and submit revisions, as appropriate.

2. **B.1.c.: Hydrogeological Investigation** (Rule 62-701.730(2)(a)3, F.A.C.).

a. Section B.1.c., of the Engineering Report indicated that there was no change from the hydrogeological investigation prepared for the permit application for the construction and operation of the lined emergency cell. Please provide the details of the hydrogeological investigation previously provided for the lined emergency cell (title, date and preparer), identify which portions of this investigation remain valid, and verify that this document remains in the Department's current files or provide a signed/sealed copy of this investigation.

b. Section B.1.c., of the Engineering Report indicated that the most recent hydrogeological investigation was completed by The Colinas Group as part of the Preliminary Contamination Assessment Report that was prepared for the Sumter County Closed Landfill, and that a copy of this report was provided in Appendix B for reference. Review of the Department's files indicated that the PCAR document (reference provided in comment #1.h., above) contains at least the following differences with the document provided in Appendix B:

- Section 3.1, ¶3 of the PCAR document was omitted
- Section 3.2, ¶1 of the PCAR document was revised
- Section 3.4 of the document in Appendix B included a new ¶3
- Section 4.1 of the document in Appendix B referenced figure numbers different than the PCAR document
- Section 4.1, ¶5 of the PCAR document was revised (last 3 sentences omitted)
- Section 4.2 of the document in Appendix B referenced a well inventory search area different than the PCAR document
- Section 4.2 of the document in Appendix B referenced figure numbers different than the PCAR document
- Section 4.3 of the document in Appendix B referenced a surface water inventory search area different than the PCAR document
- Section 5.2 of the document in Appendix B referenced figure numbers different than the PCAR document
- Section 5.3 of the document in Appendix B referenced a figure number different than the PCAR document
- Section 5.4 of the document in Appendix B referenced figure numbers different than the PCAR document
- Section 5.4 of the document in Appendix B referenced a ground water elevation change between wells MW-9 and MW-9A different than the PCAR document
- Section 5.5 of the document in Appendix B referenced figure numbers different than the PCAR document
- Section 5.5 of the document in Appendix B included a new ¶9 (nitrate at well MW-4)
- Section 5.5, ¶9 of the PCAR document was omitted (TDS at well MW-4)
- Section 7.2, ¶6 of the PCAR document, potential source of elevated nitrate #3 (animal wastes) was omitted
- Section 7.2, ¶7 of the PCAR document was revised
- Section 7.2, ¶9 of the PCAR document was omitted (nitrate in well MW-6A)
- Section 7.4, ¶2 of the PCAR document was revised
- Section 7.4, ¶3 through ¶5 of the PCAR document were omitted

Please clarify the above-listed differences between the PCAR document and the document submitted in Appendix B (and any other differences) and submit revisions, as appropriate.

(Comment #2 – Hydrogeological Investigation, continued)

c. Please note that Rule 62-701.730(2)(a)3, F.A.C., requires that the Engineering Report submitted for a C&D debris disposal facility include a hydrogeological investigation which meets the criteria of Rules 62-701.410(1)(a) and 62-701.410(1)(c), F.A.C. Please also note that Rule 62-701.730(4)(b), F.A.C., requires a ground water monitoring plan be submitted which meets the criteria set forth in Rule 62-701.510, F.A.C., and Chapter 62-522, F.A.C., both of which require the monitoring plan to be based on site-specific hydrogeological data. Furthermore, as required by Rule 62-701.510(2)(a), F.A.C., the monitoring plan shall be based on the hydrogeological investigation required in Rule 62-701.410, F.A.C. Please submit a revised Engineering Report for the proposed C&D disposal facility that provides the results of a site-specific hydrogeological investigation to address the following items:

- i) Rule 62-701.410(1)(a)1, F.A.C. – rate and direction of ground water and surface water flow, including seasonal variations.
- ii) Rule 62-701.410(1)(a)2, F.A.C. – background quality of ground water and surface water.
- iii) Rule 62-701.410(1)(a)3, F.A.C. – any on-site connection between aquifers.
- iv) Rule 62-701.410(1)(a)4, F.A.C. – for all confining layers, semi-confining layers, and all aquifers below the landfill site that may be affected by the landfill the porosity or effective porosity, horizontal and vertical permeabilities, and the depth to and lithology of the layers and aquifers.
- v) Rule 62-701.410(1)(a)5, F.A.C. – topography, soil types and characteristics, and surface water drainage systems of the site and surrounding the site.
- vi) Rules 62-701.300(2)(b) and 62-701.200(2)(h), F.A.C. – prohibit the storage or disposal of solid waste within 500 feet of an existing or approved potable well or 1,000 feet of a community water supply well, respectively.

3. **B.6.: Monitoring Plan** (Rule 62-701.730(4)(b), F.A.C.). Please submit revisions to Section B.6., of the Engineering Report to provide a monitoring plan for the proposed C&D disposal facility to address the following items:

- a. Rule 62-701.510(2)(a), F.A.C. – Monitoring plan shall be based on the hydrogeological investigation required by Rule 62-701.410, F.A.C.
- b. Rule 62-701.510(2)(b), F.A.C. – The monitoring plan shall be installed and consist of a sufficient number of ground water wells installed at appropriate depths to yield ground water samples from the uppermost aquifer, as well as other aquifers reasonably expected to be affected by the landfill.
- c. Rule 62-701.510(2)(b), F.A.C. – All sampling and analysis activities shall be performed in accordance with Chapter 62-160, F.A.C.
- d. Rule 62-701.510(2)(c), F.A.C. – The monitoring plan shall specify sampling locations and frequency, and shall provide justification for these locations and frequencies based on site conditions.
- e. Rule 62-701.510(3)(a), F.A.C. – Proposed detection wells shall be located within the zone of discharge hydraulically downgradient from the solid waste disposal unit, no more than 50 feet from the edge of the solid waste disposal unit, unless site conditions make such placement impractical.
- f. Rule 62-701.510(3)(c), F.A.C. – A sufficient number of background wells installed as part of the site hydrogeological investigation required in Rule 62-701.410, F.A.C., shall be maintained throughout the design life of the landfill to provide information on background water quality.



(Comment #3 – Monitoring Plan, continued)

- g. Rule 62-701.510(3)(d)4, F.A.C. – The monitoring plan shall provide the technical justification for monitor well construction details.
- h. Rule 62-701.730(4)(b)4, F.A.C. – The monitoring plan shall provide the list parameters for “routine sampling events.”
- i. Rule 62-701.730(4)(b)5, F.A.C. – The monitoring plan shall provide the list of parameters for “initial sampling events.”
- j. Rule 62-701.730(4)(b)5, F.A.C. – The monitoring plan shall provide the list of parameters for “renewal sampling events.”
- k. Rules 62-701.510(9)(a) and Rule 62-701.510(9)(b), F.A.C. – The monitoring plan shall provide the reporting requirements for routine sampling events and technical reports, respectively.
- l. Rule 62-701.510(7), F.A.C. – The monitoring plan shall provide the criteria for implementing evaluation monitoring, prevention measures or corrective actions.

This staff assessment is preliminary and is designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the Department and may be subject to revision pursuant to additional information for further review.

I can be reached at 813-632-7600, extension 336, to discuss these comments.

jrm