

1 December 2008

Mr. F. Thomas Lubozynski, P.E.
Waste Program Administrator
Solid and Hazardous Waste Program
Florida Department of Environmental Protection, Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Re: 9th Semi-Annual Water Quality Sampling Event
J.E.D. Solid Waste Management Facility (JED Facility)
Omni Waste of Osceola County, LLC
Permit Nos. SC49-0199726-004 and SO49-0199726-005
WACS Facility ID 89544

Dear Mr. Lubozynski:

The purpose of this letter is to inform the Florida Department of Environmental Protection (FDEP) that monitoring parameters exceeded the Department's water quality standards in a few of the detection wells at the JED Facility during the 9th semi-annual monitoring event. In accordance with 62-701.510(7)(a) Florida Administrative Code (F.A.C.) the Department is being notified of these findings within 14 days of receipt of the analytical laboratory results. A brief summary of the monitoring parameters exceeded are presented below.

Monitoring well 10A (MW-10A) was initially sampled on 4 November 2008. Laboratory data received on 18 November 2008 showed that benzene and ammonia were detected in MW-10A at concentrations of 1.3 µg/L and 12 mg/L, respectively, which are both above the regulatory levels for benzene of 1.0 µg/L and ammonia of 2.8 mg/L. This is the first time that the GCTL for benzene has been exceeded in this well. Ammonia has historically been detected in MW-10A above the GCTL since the 2nd semi-annual event, before the adjacent disposal cell (Cell 2) was constructed. This well will be resampled for the list of Appendix 1 volatile organic compounds within 30 days of receipt of the laboratory data in accordance with 62-701.510(7)(a), F.A.C. The results of this supplemental sampling will be included in the 9th semi-annual water quality report.

Monitoring well 9A (MW-9A) was initially sampled on 5 November 2008. Laboratory data received on 21 November 2008 showed that benzene and vinyl chloride were detected in MW-9A at concentrations of 7.7 µg/L and 2.1 µg/L, respectively, which are above the regulatory level for both constituents of 1.0 µg/L. Benzene and vinyl chloride have been detected in MW-9A during the last four semi-annual events and a discussion provided in the water quality reports. Ammonia was also detected in MW-9A above the GCTL, however, ammonia has historically been detected in MW-9A above the GCTL since the 2nd semi-annual event, before the adjacent disposal cell (Cell 2) was constructed. A blind duplicate was also collected at this well on 5 November 2008 and the results were comparable to the results presented

above. Based upon this information, MW-9A will not be resampled and the sample results will be considered as representing current conditions.

Monitoring well 11A (MW-11A) was initially sampled on 4 November 2008. Laboratory data received on 18 November 2008 showed that benzene was detected in MW-11A at a concentration of 1.8 µg/L, which is above the regulatory level for benzene of 1.0 µg/L. Benzene has been detected in MW-11A for the last two semi-annual events and a discussion provided in the water quality reports. The detection during this most recent event is lower than that of the last semi-annual event detection of 3.3 µg/L. Ammonia and arsenic were also detected in MW-11A above the GCTLs, however, ammonia and arsenic have historically been detected in MW-11A above the GCTL since the 2nd semi-annual event for ammonia and the original baseline event for arsenic, and before the adjacent disposal cell (Cell 3) was constructed. Based upon this information, MW-11A will not be resampled and the sample results will be considered as representing current conditions.

A few other wells also had detections of ammonia (MW-3A, 4A, 4B, 5A, 7A, 8A), arsenic (MW-13A), and TDS (MW-4B), however, the detections are representative of historical data, and or slightly above the GCTLs. These wells will not be resampled and the initial sample results will be considered as representing current conditions.

Please note that not all of the laboratory analytical data from the 9th semi-annual event has been received. After the data has been received and reviewed, the Department will be notified of any exceedances of the GCTLs.

If you have any questions or need additional information, please contact the undersigned.

Sincerely,



Kirk Wills
Project Engineer

cc: M. Kaiser, WSI
L. Levin, FDEP