



**Public Works Department
Solid Waste Division**

August 20, 2009

ENV-09-169

Mr. Tom Lubozynski, P.E.
Waste Administrator
Florida Department of Environmental Protection
Central District, 3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

**RE: Response to Inspection Report Transmittal dated August 5, 2009
Permit No. SC64-0078767
Tomoka Farms Road Landfill – Class I Operation, Class III Operations and
South Cell Post-Closure Care**

Dear Mr. Lubozynski:

The purpose of this letter is to respond to the bullet points in the transmittal letter and the items checked "not okay" in the inspection checklist. For ease of reading this letter I have provided DEP comments then Volusia County's responses.

The following are to address the bullet points noted in the transmittal letter:

1. On the north side of the Class I Landfill it appears that leachate was mixing with storm water and draining into the North Lake.

Response: The seepage areas on the north side of the Class I Landfill were excavated, back filled with clean soil, and re-soded. See attached photographs.

2. On the south side of the Class I Landfill leachate was seeping from the landfill and flowing outside the lined area. It appeared that the leachate was mixing with storm water.

Response: The seepage areas on the south side of the Class I Landfill were excavated, back filled with clean soil and re-soded. See attached photographs.

3. The haul road that runs between the east and west portions of the Phase I, Class I Landfill was acting as a pathway for seeping leachate to flow aboveground, down to the southern toe of the landfill on the east side of the roadway. It

appeared that leachate had left the lined landfill. This was the same problem that was observed during the previous inspection conducted on April 2, 2009.

Response: as discussed in the May 28, 2009 meeting the County intended to revise the fill sequence plan, which was submitted on August 13, 2009. Part of the revision was to fill the west and south slopes to final grade serving several purposes. First, by adding the additional waste to the south slope it will eliminate the current haul road which cuts through the cell creating a pathway for storm water and leachate to travel. It is also believed adding the additional waste will provide a heavier compacted load to the side slope, forcing the leachate through the cell to the leachate collection system. Lastly, once the west and south slopes are at final grade partial closure to the north cell will be initiated. Once those areas are capped leachate seeps will no longer be an issue.

In the interim, the County plans to implement a Post Rain Event Checklist. The checklist will include items to observe, problem areas identified, and corrective action taken and will become part of the County's Operation Plan.

4. Leachate was seeping and ponding on the west side of the haul road where it intersects with the East Cell haul road. It appeared that the leachate had flowed outside the lined area.

Response: as indicated above, the fill sequence plan has been revised. The county intends on placing waste over the horizontal gas collector which is believed to have created the pathway contributing to the mentioned leachate seep. Again, once this is accomplished and partial closure is complete leachate seeps will no longer be an issue.

The following is to address the items checked not okay in the inspection checklist:

- 2.22 - Is litter controlled and are litter control devices maintained?

Response: as indicated in the inspection report, the County actively had a crew of day labors removing litter. The County also utilizes portable and permanent litter control fences daily to control wind blown litter and removes wind blown litter from the fences via a MADVAC system.

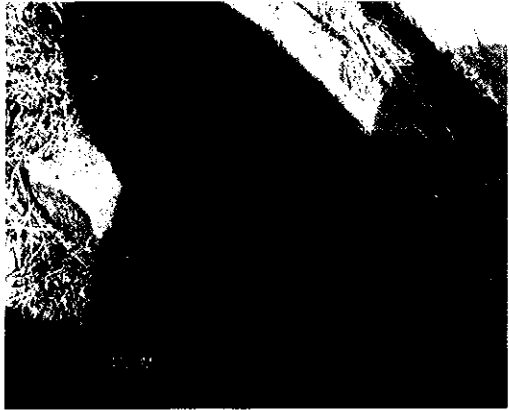
- 2.24 – Is leachate collection and removal system maintained and operated as required?

Response: Similar responses to items 3 and 4 is the method followed to this comment. In addition, the County is currently working to repair the side slope risers and replacing pumps along with hauling leachate off-site for treatment.

- 2.30 – Is mixing of leachate and storm water prevented or minimized?

Response: Any potential possibility of storm water mixing will be controlled by placing earthen berms as deemed necessary followed by removal and replacement of leachate contaminated soils. Also note that County plans to

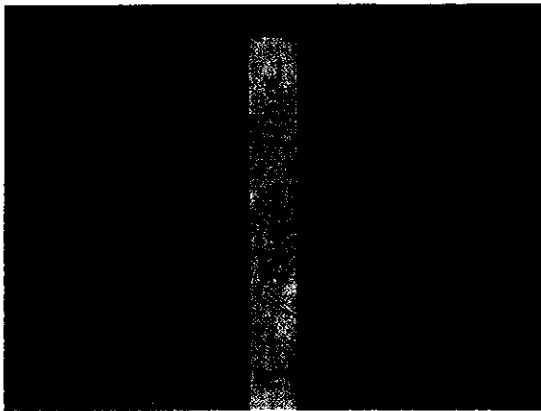
implement a Post Rain Event Checklist documenting type of items to observe, problem areas identified, and corrective action taken.



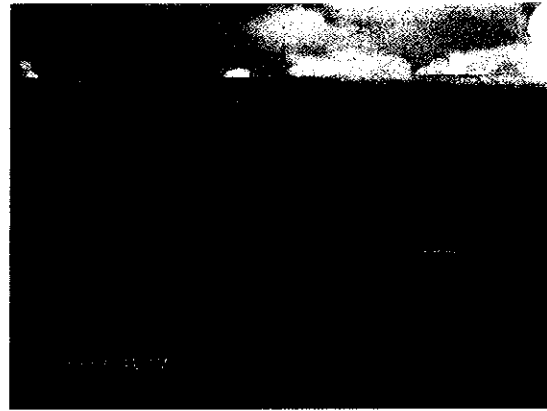
Storm water out fall noted during June 2009 inspection.



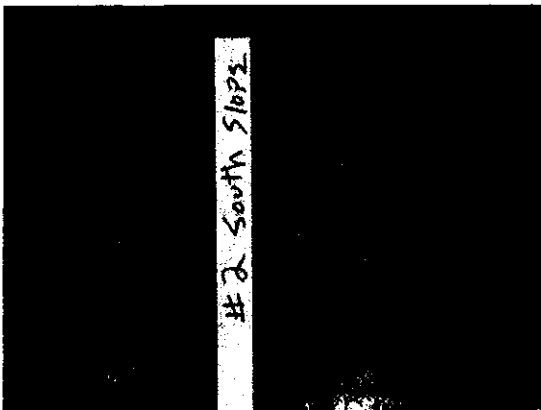
North slope weep repair.



North slope weep noted during inspection.



South Slope weep repair.



South Slope weep noted during inspection.

2.31 – Is storm water management system maintained and operated as required?

Response: See response numbers 1 & 2 above. Also note that County plans to implement a Post Rain Event Checklist documenting type of items to observe, problem areas identified, corrective action taken.

3.5 – Are there any signs of erosion of final cover?

Response: The erosion noted on the closed south cell has been corrected. See attached photographs.

Item 1.1, fill sequence plan, was not included in the checklist, however, it was mentioned in the Pre-existing Areas of Concern in the body of the report. On behalf of the County SCS Engineers submitted a revised fill sequence plan on August 13, 2009.

Additional photographs will be supplied via a compact disc.

In summary, the revised fill sequence plan moves the haul road to the northwest corner of the class I and allows for the south slope to be filled to final grade allowing the County to move forward with partial closure plans. The County is ready to move forward with implementation of the plan while continuing to take a pro-active approach to control future leachate issues.

If you have any questions, you may contact me at 386-943-7889 or lm Marion@co.volusia.fl.us.

Sincerely,



For: Leonard L. Marion
Solid Waste Division Director

CC: Chet Purves, Construction Manager
Jennifer Stirk, Environmental Specialist
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