



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

By E-Mail
dmccConnell@wm.com

Mr. David McConnell
Waste Management Inc. of Florida
6501 Greenland Road
Jacksonville, FL 32258

OCD-SW-09-0397

Orange County - SW WACS # 87081
Vista Materials Recovery Facility, Class III MRF - WPF
First Request for Additional Information
Permit Application No. SO48-0165969-017

Dear Mr. McConnell:

Raymond J. Chewning, P.E. and Geosyntec Consultants submitted an application titled "Permit Application to Construct and Operate a Waste Processing Facility, Vista Materials Recovery Facility, Vista Landfill, LLC, 242 West Keene Road, Apopka, Orange County, Florida". It was dated November 30, 2009 and received by the Department on December 07, 2009. The application was signed and sealed by Raymond J. Chewning, P.E. We have assigned Permit No. SO48-0165969-017 to the application. Your application is incomplete. Please provide the information listed on the attached sheets promptly. Evaluation of your application will be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application numbers in your correspondence. Also, an electronic version of the submittal would be appreciated.

If you have any questions, please contact me at (407) 893-3328 or by e-mail at tom.lubozynski@dep.state.fl.us.

Sincerely,

F. Thomas Lubozynski, P.E.
Waste Program Administrator

Date: December 28, 2009

FTL/sj
Enclosure

cc:
Raymond J. Chewning, P.E. - rchewning1@tampabay.rr.com
Irv Slike, Waste Management Inc. of Florida - islike@wm.com
R. Jay Davoll, P.E., City of Apopka - jdavoll@apopka.net

Note that all references to "Report" in the following text refer to the document entitled "Permit Application to Construct and Operate a Waste Processing Facility, Vista Materials Recovery Facility, Vista Landfill, LLC, 242 West Keene Road, Apopka, Orange County, Florida", to construct and operate a Class III Materials Recovery Facility at the Vista Class III Landfill facility, Prepared by: Raymond J. Chewning, P.E., 11205 3rd Street East, Treasure Island, FL 33706, and Geosyntec Consultants 14055 Riveredge Drive, Suite 300, Tampa, FL 33637, dated November 30, 2009.

1. **Notification to the Local Government:** The applicant needs to notify the local government having jurisdiction over the facility of the filing of the permit application before or on the same day of filing the application with the Department, Section 403.707(14), F.S. Submit proof to the Department that the local government was notified. Providing Mr. R. Jay Davoll, P.E. City of Apopka, with a copy of the original application and your response to this Request for Additional Information is sufficient notice.
2. **Proof of Publication of Notice of Application:** Submit proof of publication of Notice of Application as required in Department of Environmental Protection letter OCD-SW-09-0390 dated December 21, 2009.
3. **Drawing 5 of 5 Titled "Details", Section 3/4 Leachate Pump Station:** This sectional detail shows an outlet pipe fitted with a 2" gate valve in the leachate pump station basin. Clarify where the outlet pipe will discharge the leachate to.
4. **Material Disposition Table:** Provide a Material Disposition Table with the Material Type, Maximum Storage Quantity, Covered or Uncovered, Method of Storage, and Maximum Hold Time for materials handled at the facility.
5. **Appendix E, Operation Plan, Section 4.2.2 Unloading:** The first sentence refers to Sheet 3 of the permit drawings for Operational Site Layout. However, the Operational Site Layout is Sheet 4 of 5 in Appendix B. Similarly, an incorrect reference of Sheet 3 instead of Sheet 4 is made in Section 4.2.4, Section 4.2.5 and Section 4.4. However, to be useful, the Operations Plan should be a standalone document readily available at the facility. All drawings should be included in the Plan; the reader should not have to go to other documents. Please revise the Operation Plan by including the Operational Site Layout drawing as part of the Plan; reference it correctly in the Sections noted above. Please submit the revised pages or a new Operations Plan.
6. **Appendix E, Operation Plan, Attachment A, Emergency Response Contacts:** The emergency response telephone numbers list incorrect telephone number for FDEP Central District during non-business hours. The FDEP Central District Office main telephone number is 407-894-7555 instead of 407-893-3337. Submit the corrected page in the revised Operations Plan.
7. **Appendix F, Financial Assurance Documentation:** The Department has the following comments related to the Closure cost estimate submitted in Appendix F.
 - i. The cost estimates are to be calculated based on maximum inventories of materials held on-site to reflect the most expensive option. The closure costs are to be based on the worst case scenario, that is, the maximum amount of waste that might be on-site at any time. The revised cost estimate must be based on the quantities that will be submitted in response to Comment No. 4 above.
 - ii. The source of the estimates for the "cost/unit" values used in the Closure Cost Estimate must be provided. The costs must be estimated and certified by a professional engineer for a third party performing the work, on a per unit basis, with the source of estimates indicated.
 - iii. A contingency factor is necessary. The Department accepts 10 percent contingency factor as adequate. If you elect to use a smaller contingency factor, you must justify it.
 - iv. The contingency must be added to the total cost.

- iv. Submit a revised closure cost estimate for the facility based on the comments i thru iii, signed and sealed by a professional engineer licensed in the State of Florida.

8. Financial Assurance Mechanism: A financial assurance mechanism must be funded in the amount specified in the approved cost estimate and accepted by the Department's Financial Coordinator before this application can be deemed complete. Financial responsibility arrangements for the approved amounts are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and a copy of the approval letter submitted to: Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767, Rule 62-701.710(7), F.A.C. However, the Department has not yet approved the cost estimate.