



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

June 25, 2010

SENT BY E-MAIL TO:
(lm Marion@co.volusia.fl.us)

Volusia County Solid Waste Division
3151 East State Road 44
DeLand, FL 32724

OCD-IW-10-124

Attention: Leonard Marion
Director – Solid Waste Division

Volusia County - IW
VCDSWM – Tomoka Farms Road Landfill NPDES
Industrial Wastewater Permit Number 64-FL0037877
File Number 64-FL0037877-003-IW7D
Request for Additional Information (RAI) Letter

Dear Mr. Marion:

The Department of Environmental Protection received your Industrial Wastewater permit application on June 2, 2010. Engineering and technical staffs performed a preliminary review of the material submitted in support of the permit for the proposed project. The information listed below is required to sufficiently review the application to determine a reasonable assurance of compliance. This information is being requested pursuant to the authority vested in the Department under Section 403.0876, Florida Statutes and Section 62-620.510, Florida Administrative Code.

1. The Department notes a pattern of water quality exceedances at D-001 as listed in the table 6 summary of Analytical Results that was included with the package to renew. Of the 11 samples reported there are 6, which exceed the surface water quality standard for Iron. This office requests a proposal from the County to bring this parameter into consistent compliance with the applicable standard.
2. There were also 2 instances where the Dissolved Oxygen was below 5.0 mg/L. In the most recent of those cases the result was only 1.86 mg/L. Page 5 of 8 of the permit renewal narrative has a good discussion of the situation with Dissolved Oxygen (D.O.). The discharge could gain benefit from the turbulence if created in the swale. We would anticipate that the D.O. test would be done with a probe in the field for the permitting requirements. Please also consider mechanical means of correcting this problem. Please discuss.
3. At the top of Page 5 of 8 of the permit renewal narrative the text indicates that the ground water in the general area of the landfill has a naturally high back ground water level of Total Recoverable Iron.

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The County normally has the ground water issues at the facility addressed via the DEP Solid Waste permit. In coordination, we found that the Solid Waste Program has not set an alternate standard for Iron. The IW program can work with a higher Iron limit for the discharge to ground water, but that limit needs to be assessed by the Department's Solid Waste Program. Please contact that Program and make a formal request for an alternate ground water standard for inclusion in the IW permit for G-001.

4. It is noted in the effluent data summary that the levels for Silver at D-001 is normally BDL with the detection limit at 0.05 ug/L. One result of 0.067 is noted in comparison to the standard of 0.070 ug/L. While not a violation, this result is very close. Please check with the lab as to any possible problems with that sample. An additional sample is requested for better assurance. It is noted that the data presented in from 2CG has a maximum value of 2.5 ug/L for the ground water discharge at G-001. It is assumed that the additional dilution during a rain event is reducing the concentration down to that noted at D-001. This could however be a future problem and needs to be assessed. Please evaluate the source of the Silver being found.

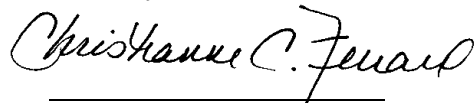
A copy of the application package has been sent to our experts in the Tallahassee office. They may provide additional comments on the surface water aspects of the application.

Please assure that 2 copies of the requested information are submitted with the original signature and seal of the engineer-of-record. If possible, please also submit the required information in electronic format. This is not a requirement, but it is encouraged. The Department can utilize Microsoft Word and Microsoft Excel documents. A response is requested within 30 days of the receipt of this letter.

The processing of the subject application will resume following receipt of the information needed to complete the application. Failure to provide the information in a timely manner will be grounds for denying the permit.

In your response, please refer to the above OCD number. Your cooperation in this matter will be appreciated. If you have any questions, please contact me at telephone number 407-893-3317, FAX number 850-412-0493 or e-mail ali.kazi@dep.state.fl.us.

Sincerely,



Christianne C. Ferraro, P.E.
Program Administrator
Water Facilities

AK/ee

cc: Volusia County Environmental Management Dept. (tcarey@co.volusia.fl.us)
Gary Miller, Program Manager/Wastewater Compliance Enforcement Section/DEP/Orlando
Jan Mandrup-Poulsen/DEP/Tallahassee
Tom Lubozynski, Program Administrator, Waste Management/DEP/Orlando
Candice Burger, Water Shed Assessment/ DEP/Tallahassee
Eva N. Wesson, P. E. /(nwesson@precisionengr.com)