



Florida Department of Environmental Protection

Northeast District Office
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Jacksonville, Florida 32256-7590

Charlie Crist ^{01/20 F}
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 20, 2010

Mr. R.D. McConnell
Area Vice President
Trail Ridge Landfill, Inc.
5110 U.S. Highway 301
Baldwin, Florida 32234

**Re: Trail Ridge Landfill
WACS I.D. Number NED/16/00033628
Minor Modification Application of the Class I Landfill Permit
FDEP File Number 0013493-018
Third Request for Additional Information
Duval County - Solid Waste Permitting**

Dear Mr. McConnell:

The Florida Department of Environmental Protection (DEP) has reviewed the Response to the Second Request for Additional Information, dated and received July 26, 2010. The following review is enclosed:

Attachment 1, Review Memorandum dated August 19, 2010, prepared by Michael Bogin.

The information requested in this review is required for DEP to continue processing your permit application. Therefore, please provide the requested information by October 4, 2010, and note that action on the application may be delayed until it is received. Also, please reference the associated DEP File and WACS I.D. Numbers on all written correspondence concerning this project. Finally, if you have any questions or comments regarding this matter, please contact Michael Bogin at the letterhead address, by e-mail Michael.Bogin@dep.state.fl.us, or by telephone number 904.807.3355.

Sincerely,

Emerson C. Raulerson, P.E.
Solid Waste Section Supervisor

MB
mb:cs
Enclosure

cc: Juanitta Bader Clem, P.E. - England, Thims, and Miller, Inc. *More Protection. Less Process.*

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Florida Department of Environmental Protection

Memorandum

TO: Files

THROUGH: Raulerson Emerson, P. E. *ECR*
Solid Waste Section Supervisor

FROM: Michael Bogin, Engineering Specialist IV *MB*
Solid Waste Engineer

DATE: August 19, 2010

SUBJECT: Trail Ridge Landfill
WACS I.D. Number: NED/16/00033628
Minor Modification Application of the Class I Landfill Permit
FDEP File Number 0013493-018
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The Florida Department of Environmental Protection (DEP) has reviewed the Response to the Second Request for Additional Information, dated and received July 26, 2010. The following are comments and/or requests for additional information:

- ❖ **In responding to this request for additional information (RAI) if one response modifies a section of the Operation Plan or the Contingency Plan and Emergency Procedures Plan, the respective section(s) should be modified accordingly. A revised, completed version of the plans that includes all revisions made in responding to this RAI should be attached. To enable DEP to view changes to the plan, all additions should be underlined (e.g., added) and all deletions should be struck through (e.g., ~~deleted~~). By this method, DEP hopes to have one final version of the respective plans that includes all revisions made during this permitting process.**
- 2. a. Response is not adequate. The Response does not address issues regarding what is an adequate amount of time to visually inspect a load and what is an adequate amount of personnel to properly manage waste at the Facility. Therefore, as previously requested, please provide calculations that demonstrate the time that will be allowed for equipment operators/ spotters to inspect each load of waste for unauthorized material; to remove unauthorized waste or call someone else to remove it; and to spread and compact the waste while taking into consideration the per vehicle space utilized for waste disposal and the limited amount of personnel. Furthermore, when making such calculations, please note that the statement in the response that the "...typical maximum loads per day are

approximately 40 trucks per hour..." appears to be referring to the average number of loads per hour during a typical maximum day instead of the necessary maximum number loads per hour (i.e., during the peak hours of a heavy day). Please address.

- b. Response is adequate.
- c. (1) Response is not adequate. While the response indicates that the Operation Plan was revised, the attached pages 14 and 15 do not reflect the requirement that "The heavy equipment operator shall be trained as an operator or spotter." Please make the appropriate changes to the Operation Plan.

Also, please note that two versions of the fully revised Landfill Operation Plan, including figures, drawings, and attachments, must be submitted and reviewed by DEP's Solid Waste Section prior to a final decision regarding a permit. One version must show all of the tracked changes (underlined and struck through) that have been made to the previously approved Operation Plan (i.e., the one approved as part of the present Permit) and the other must be a final complete version without the tracking. Therefore, as previously mentioned, please utilize the Operation Plan submitted in Second Response to DEP Request for Additional Information, prepared by England-Thims and Miller, Inc. (dated May 6, 2009) as a basis and reflect the proposed changes in this Application. Please address.

- (2) Response is adequate.
 - (3) Response is adequate.
3. The response is partially adequate. The Department agrees with the allowance for a larger working face without DEP notification following a major storm event. However, either DEP notification will be needed to increase the working face for when filling or grading in preparation for intermediate or final cover, or much more specificity is needed as to when, where and for how long a larger working face will be used. For example, what is the maximum amount of time that the expanded working face will be utilized? What is the maximum depth of applied waste in this expanded working face? What is the maximum size of the expanded working face(s)? Also, please verify that the exception statement "When the facility is placing waste on side slopes" is contingent upon that area being filled/graded in preparation for intermediate or final cover. Finally, please verify that the exception only refers to the situation in which the facility has already filled an area, applied the

necessary cover material, moved on, and are then going back add additional waste to correct settlement or erosion, or to add the "finishing" elevation to the area before applying intermediate or final cover.

4. Please see Comment 3, above.

13. DEP agrees to make the additional modifications requested toward the end of the response (and listed as a-g.) which are consistent with the revised Rule. However, as previously required during our teleconference on July 16 and in the e-mail from Michael Bogin dated July 21, 2010, since amendments to Chapter 62-701, F.A.C. became effective on January 6, 2010, please verify that any and all portions of the application and the Operation Plan are in compliance with the revised Chapter, and note that Rule-allowed modifications cannot be made unless Rule-required modifications are also made. In other words, modifications reflecting those portions of the revised Rule that are less regulating can only be made if modifications reflecting those portions that are more regulating are obtained simultaneously. Please make (and track) appropriate changes, if necessary.