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Jeff Kottkamp Lt. Governor

> Mimi Drew Secretary

ELECTRONIC MAIL

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Mr. Mike Kaiser Omni Waste of Osceola County, LLC (Omni) 1501 Omni Way St. Cloud, Florida 34773 OCD-SW-10-0585

Osceola County - SW
JED Solid Waste Management Facility
Permit # SO49-0199726-005 and SC49-0199726-004
WACS # 89544
Response to "Status Report of Methane Gas Migration Investigation"

Dear Mr. Kaiser:

Waste Services submitted the document "Status Report of Methane Gas Migration Investigation" dated 11/14/2010. The report contained the following request:

Additional Request by Omni

Omni requests FDEP approval to abandon the existing permanent gas probes and replace them with new permanent gas probes in the same location, however, with a different screen interval. Due to different screen intervals between the permanent and temporary probes, it is believed the facility's water table may be influencing the monitoring results when comparing results between paired probes and seasonal variations. The existing permanent gas probes are screened from approximately 74' to 80' BGS and the temporary gas probes are screened from approximately 80' to 88' BGS. The bottom screened elevation of 80' BGS for the temporary probes represents the lowest elevation of waste fill in the disposal cells (top of protective cover elevation in the sump areas). Omni requests to install the new permanent probes with a bottom screen interval at 80' BGS.

The Department accepts the possibility that the differences in elevation of the bottom of the screens might influence the monitoring results. Also, the Department agrees that having the landfill gas probe screens 100% in the water table, even seasonally, is not desirable. However, your request does not meet the requirements of Rule 62-701.530(2)(b), F.A.C..

Per Rule 62-701.530(2)(b), F.A.C., soil monitoring probes shall extend to the depth of the base of waste fill or at least three feet below ground surface, whichever is deeper. The original ground surface was at approximately 80.5′ NGVD and the lowest waste fill elevation is at approximately 80′ NGVD. The Department will approve the following changes to the landfill gas monitoring probes in order to satisfy the Rule and address the screened interval variations:

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- Abandon the existing permanent gas probes.
- Replace them with permanent gas probes in the same location (in the landfill perimeter berm with an elevation of approximately 85' NGVD).
- Construct the new probes such that the bottom of the screened interval will be at approximately 77.5′ NGVD.
- The screened length should be five feet or six inches below land surface which is less.

These changes will require a minor modification to the existing solid waste operating permit. The submittal must identify each location that will have a new well. It must show a detail drawing for the new landfill gas probes. Although the landfill gas probe changes do not affect the gas collection and treatment system, I recommend you check with the Air Program regarding whether they have permitting requirements.

Please contact Gloria-Jean DePradine by telephone at (407) 893-3994 or by e-mail at gloria.depradine@dep.state.fl.us, or contact Kim Rush at (407) 893-3328 or by e-mail at kim.rush@dep.state.fl.us if you have any questions or need additional information.

Sincerely,

F. Thomas Lubozynski, P.E Waste Program Administrator

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Date: December 16, 2010

FTL/gnd/kr

cc:

Shawn McCash, Waste Services, Inc., <u>SMcCash@wasteservicesinc.com</u> Caroline Shine, CD Air Program Administrator <u>Caroline.Shine@dep.state.fl.us</u>