



Florida Department of Environmental Protection

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Transmitted via email only to Casey.Stephens@bocc.citrus.fl.us

Mr. Casey Stephens, Director
Citrus County Solid Waste Division
P.O. Box 340
Lecanto, Fl. 34460-0340

October 1, 2010

RE: Citrus County Central Class I Landfill
7-Acre Re-Closure Construction Certification
Permit No.: 21375-014-SF/01, Citrus County
WACS No.: SWD/09/39859

Dear Mr. Stephens:

The Department has reviewed the above referenced Certification of Construction Completion of the 7-Acre Re-closure and supporting documents received on August 31, 2010 and September 3, 2010. Based on the Department's review, the certification of construction is not approved at this time. This is the Department's first request for information. Please provide the information listed below promptly.

REPORT OF CONSTRUCTION

Contract Documents:

1. Please revise this section to include a reference to the Environmental Resource permit issued for the modifications to stormwater management system.

Summary of Construction:

2. **Regrading of Existing Dry Retention Areas (DRA):** The modifications to the stormwater management system described in this section were permitted under by the Department's ERP Section. Approval of the construction of the stormwater system modifications shall be obtained from the Department's ERP Section. Therefore the stormwater system modifications were not reviewed by the Department's Solid Waste Section as part this construction certification submittal. Please revise this section to reference the approval of the construction of the stormwater management system modifications by the Department's ERP Section, as applicable.

3. **Vertical Gas Vents:** Rule 62-701.530(1)(a)3., F.A.C. specifies that "Collection pipes, pathways, or vents shall (be designed to) collect gas from the upper two-thirds of the filled waste or where the most anaerobic conditions exist". Based on a review of the gas vent depths reported on the Vent Schedule on Sheet 10 of 27 of the Record Drawings, gas vents GV-2, GV-3, and GV-6 do not appear to meet this criterion. Specification Section 33 21 71-3.02.E.1.b. specifies that under the described wet boring conditions, the Engineer may either decrease the vent depth and length of perforated pipes or relocate the vent. Please verify and revise this section to provide the supporting justification for installation of gas vents GV-2, GV-3, and GV-6 at a decreased depth that does not meet the criterion of Rule 62-701.530(1)(a)3., F.A.C. rather than relocating these gas vents and abandoning the boreholes, as specified by Specification Sections 33 21 71-3.02.E.1.b. and 33 21 71-3.02.E.2., respectively.

4. **Geomembrane Cap Installation:**

a. Trial Welds & Destructive Sample Testing: Neither Specification Section 33 05 20-3.04.E.6.a. nor the CQA Plan appear to specify an allowance of "no more than 10 percent seam separation" in the peel adhesion test as described in these sections of the report. Please verify and revise these sections to provide the supporting justification for considering no more than 10 percent peel separation to be a passing test.

5. **Leachate Riser Modification:**

a. Gas Vent on Leachate Risers: This section indicates that, instead of installing replacements of existing passive gas flares on the leachate risers, passive vents were installed on the leachate risers. Department records do not appear to indicate that a permit modification was applied for and issued by the Department for this construction modification or that this construction modification was otherwise approved by the Department in accordance with Specific Condition #A.3.a. of Permit No. 21375-014-SF/01. This appears to constitute a violation of Rule 62-701.320(1), F.A.C. Please verify and revise this section to discuss this construction modification accordingly.

Appendix B - As-Built Record Drawings - SCS Engineering Record Drawings:

Please provide revised drawings that address the comments provided below, including all necessary details for the construction certification of the facility.

6. **Sheet 10 of 27:**

a. Vent Schedule: The reported boring depth of 43 ft. for gas vent GV-6 appears inconsistent with the vent construction log for GV-6 in Appendix C, which appears to indicate that the boring depth was 35 ft. Please verify and revise this sheet, as appropriate.

Appendix C - Vent Construction Logs

7. **GV-02:** This log indicates that the decision to shorten the boring depth and gas vent installation depth was made after the driller was stuck at a depth of 34-35 ft for "over an hour". However Specification Section 33 21 71-3.02.E.1.a. specifies that the boring may be terminated "after the driller has attempted to advance boring for 2 hours". Please explain why the specified criterion was not followed, resulting in the installation of a gas vent at a reduced depth that does not appear to meet the criterion in Rule 62-701.530(1)(a)3., F.A.C. (see Comment #3 above).

8. **GV-03:** A construction delay that allowed collapse of a portion of the borehole does not appear to be a justification for the installation of a gas vent at a reduced depth that does not appear to meet the criterion in Rule 62-701.530(1)(a)3., F.A.C. (see Comment #3 above). Please explain.

9. **GV-06:** This log indicates that the decision to shorten the boring depth and gas vent installation depth was made based on hitting "something extremely hard". Please explain why the gas vent was not relocating and the borehole abandoned, as specified by Specification Sections 33 21 71-3.02.E.1.b. and 33 21 71-3.02.E.2. respectively, resulting in the installation of a gas vent at a reduced depth that does not appear to meet the criterion in Rule 62-701.530(1)(a)3., F.A.C. (see Comment #3 above).

Appendix E-2 - Panel Layout Drawing

10. Please provide a revised panel layout drawing that identifies the location of each destructive test listed in Appendix E-7 and the liner repairs listed in Appendix E-5, as required by Specific Condition #B.3.a.(4) of Permit No. 21375-014-SF/01.

Appendix E-5 - Geomembrane Repair Logs

11. Please verify that the "Date Tested" and "Tested By" columns of the geomembrane repair logs refer to the non-destructive testing of the repairs. If not, please revise the Non-Destructive Test Logs in Appendix E-6 to include a log of the non-destructive testing of repairs.

12. Existing 60-mil Logs:

a. These logs refer to "See Attachment" for repair location. No attachment identifying the locations of these repairs appears to have been provided. Please provide a plan view drawing of the 7-Acre Landfill that identifies the areas of exposed 60-mil bottom liner and shows the locations of the repairs listed in Appendix E-5, as required by Specific Condition #B.3.a.(4) of Permit No. 21375-014-SF/01 and specified in Section 6.1.8.6 of the CQA Plan.

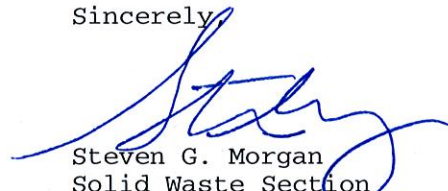
b. Please explain what is meant by each the designations made in the "Comments" column of these logs (i.e. Belair, County, Undetermined, Undecided, etc.).

Please provide all responses that relate to engineering for design and operation, including plan sheets, signed and sealed by a professional engineer. All replacement pages should be numbered and include a revision date.

This staff assessment is preliminary and is designed to assist in the review of the construction certification submittal. The comments provided herein are not the final position of the Department and may be subject to revision pursuant to additional information and further review.

Please provide **2 copies** of your response to this letter as one complete package. If you have any further question or comments regarding this letter, please contact me at (813) 632-7600 ext. 385.

Sincerely,



Steven G. Morgan
Solid Waste Section
Southwest District

sgm

cc: Daniel Cooper, P.E., SCS Engineers, DCooper@SCSEngineers.com
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