

- Met with JED Landfill on August 2, 2019.
- We negotiated to:
 - Verify that they are sampling within FDEP Standard Operating Procedures
 - Observe their Groundwater Sampling operations at their next semiannual sampling event.

- Conference Call with FDEP on Thursday, July 25, 2019
- Topics Addressed:
 1. Suitability of this Facility to Receive Coal Ash
 - FDEP Confirmed this disposal method at this facility is appropriate and allowable by Rule and the Facility permit.
 2. Safety of the Citizens
 - FDEP confirmed that there are no groundwater issues associated with the landfill offsite
 3. Compliance Wells and Site Assessment
 - FDEP is working with JED Facility to implement controls for a migrating landfill gas issue.
 4. Arsenic in the Compliance Well
 - FDEP stated that they believe the Arsenic is from a CCA treated power pole near the well not from the landfill.



FDEP Inspections Performed March and May 2019



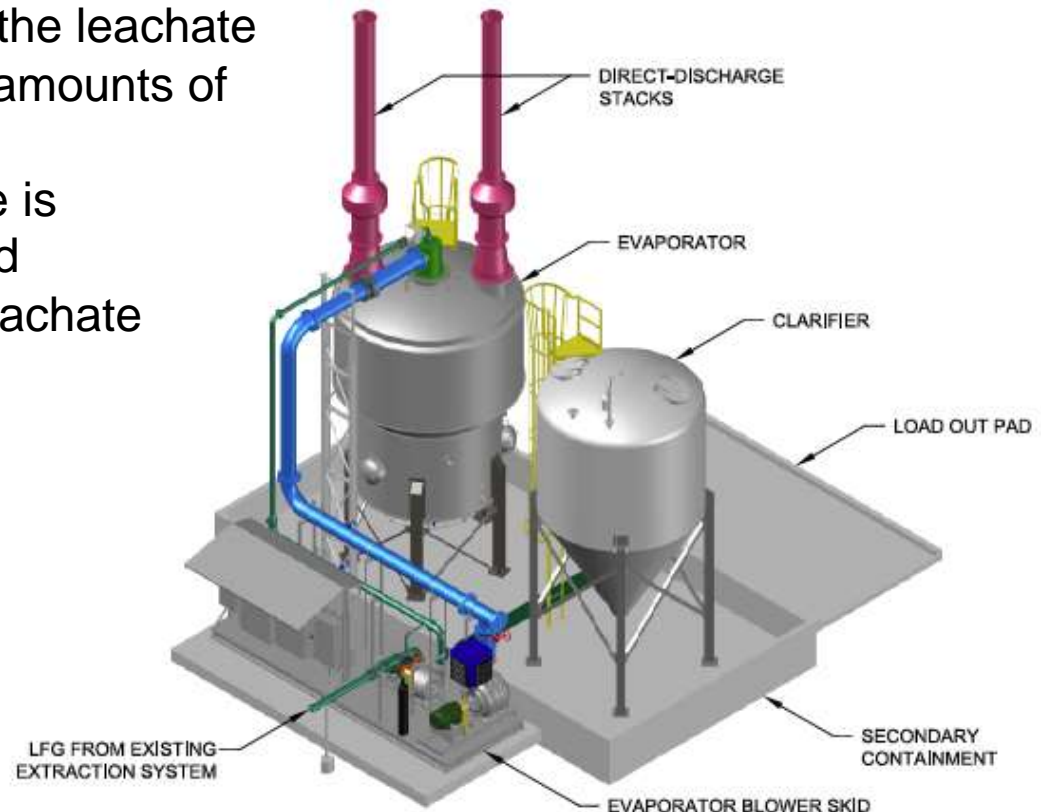
Inspection Check List Created



Coordinate Inspection Date with J.E.D.

Leachate Evaporator

- Leachate evaporation is a common method used to manage leachate at large Class I landfills
- Excess heat from combustion of landfill gas and onsite generators evaporates the leachate
- Leachate is 99% water with small amounts of other chemicals
- Approximately 90% of the leachate is evaporated and 10% remains liquid
- Remaining liquid returned to the leachate storage



What is Hazardous Air Pollutants (HAP)?

- HAPs include metals and volatile organic compounds (VOCs)
- HAPs are regulated by USEPA and FDEP
- HAPs will be either:
 - released along with the water vapor
 - destroyed by the heat of evaporation
 - remain in the 10% unevaporated leachate
- HAP emissions is directly related to the composition of the leachate
- HAP emissions from leachate evaporation of typical Class I landfill leachate is expected to be small

Recommendation

Review Request for Additional Information response when submitted by J.E.D

- FDEP received a Response to the Request for Additional Information.
- FDEP is currently reviewing the response to determine if all requirements are met and their questions are addressed.
- Leachate Evaporator Permit Status: Still Under Review by FDEP
- Before a Permit is issued, a Notice of Permit Action and Comment Period will be published in a local newspaper.

- How to participate in regulatory policy
 - FDEP Rule Making Workshops
 - <https://floridadep.gov/events>
 - Event calendar for FDEP items.
 - <https://floridadep.gov/waste>
 - Home page for FDEP Division of Waste Management
 - EPA-Get Involved with EPA Regulations
 - <https://www.epa.gov/laws-regulations/get-involved-epa-regulations#tabs>
 - This web page outlines how to find and comment on proposed versions of rules listed in the Federal Register
 - <https://www.regulations.gov/>
 - Web portal to submit questions and comment on various rules under consideration.



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