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Department of Solid Waste Management

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Mr. Nate Senn
Siting Coordination Office
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

Date: April 11, 2025

Subject: **Petition to Modify Site Certification 77-08F
Remove Resource Recovery Facility and Associated Facilities, Retain Ash Monofill,
Groundwater Monitoring, and Stormwater Controls
Completeness Determination Request for Additional Information**

Dear Mr. Senn,

The Miami-Dade County Department of Solid Waste Management (DSWM) is in receipt of the Siting Coordination Office Completeness Determination Letter dated July 26, 2024, stating that the petition to modify Conditions of Certification PA77-08E was found incomplete. The Completeness Determination Letter requested additional information be provided. This letter contains the Department's responses to each of the comments and questions in the RAI. Comments are shown in **bold**, responses are shown in *italics*. Also, the updated draft Closure Plan is included as Attachment 1 for your review and approval.

A. Siting Coordination Office

1. Please explain in detail the stormwater system that will remain under certification.

The existing stormwater infrastructure within the pavement area to be removed (see attached Closure Plan, Figure 5) will be removed during demolition. All other inlets, pipes, swales, and ponds will remain.

2. Will dewatering activities occur? If so, please describe to what extent.

Temporary dewatering activities may occur at the site during the demolition of the Garbage Processing pit, the RTI pit, and other subsurface structures. All dewatering discharges will be directed to the stormwater system and retained on site.

3. Will the need for the use of groundwater continue at the site? If so, please describe to what extent. Does this request include changes to the consumptive use conditions and allowances provided in the existing conditions of certification?

Since the RRF ceased operations, groundwater has not been used at the site and is not anticipated to be used for any remaining facilities. All remaining facilities are anticipated to use potable water provided by the local water treatment plant.

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The Department deleted the reference to groundwater usage from the COC Modification Petition, since groundwater was only used at the RRF during operations, therefore, the Petition Request did include changes to the consumptive use conditions and allowances provided in the existing COC. For your reference, the below text was proposed to be deleted in the existing COC.

~~V. Groundwater~~

~~A. General~~

~~The use of groundwater for the resource recovery facility shall be minimized to the greatest extent practicable, but in no case shall exceed 1.85 mgd.~~

4. Please identify whether the remaining facilities have septic or sewer connection, and if sewer connection, identify the permittee for the connection.

As noted on Attachment 1: Site Map, the following associated facilities shall be retained after demolition of the RRF:

- Office trailer
- WASD pump station
- Truck scales (Nos. 1 and 2)
- Guard house

None of the facilities are connected to a septic system. The WASD Pump Station and the Office trailer are the only associated facilities that have sewer connections and will retain them. The permittee for these remaining connections is the Department of Solid Waste, and the sewer connection is through the County's Water and Sewer Department.

5. Please provide a description for each of the facilities to be retained as indicated in Attachment 1: Site Map.

As noted on Attachment 1: Site Map, the following associated facilities shall be retained after demolition of the RRF:

- Office trailer
- WASD pump station
- Truck scales (Nos. 1 and 2)
- Guard house

Office trailer – Portable modular building that is approximately 2,100 sq ft and is currently utilized by Department staff and consultants. The office trailer includes both potable and sanitary water services to provide for sanitary uses.

WASD pump station – 1,000,000 gallon dual wall storage tank and pump station.

Truck scale – set of two single lane truck scales (inbound and outbound) and scalehouse.

Guard house – small structure at gated entrance on 97th Avenue.

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B. Solid Waste Program

1. How will the materials from the demolition of the facility be managed and disposed? Where will the materials be transported for management or disposal (i.e., what permitted facility will the materials be transported to)?

All non-hazardous waste materials from the demolition of the facility suitable for disposal in a Class I landfill shall be disposed at the on-site Ash Monofill, (Cell 20) which will then be permanently closed. Waste generated during the closure activities will be removed, segregated, and containerized into appropriate waste streams to consolidate waste materials with similar waste characteristics. Each waste stream will be classified for management and disposal based on available information from site visual observations and analytical results from samples of wastes collected prior to disposal. This information will be used to determine appropriate waste management characterization based on applicable waste management regulations. The County will perform required sampling for waste characterization and will prepare all waste disposal profiles.

2. The tire building is included as “To Be Demolished”. How will any remaining tires on site be managed? (Chapter 62-711, F.A.C.)

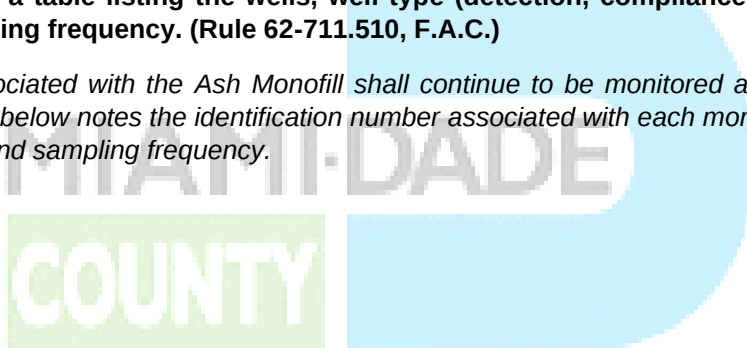
The tires processing at the Facility will be relocated. The tire building is kept empty and is used only for temporary storage in case of overflow. Any remaining tires on site shall be delivered to a permitted facility off-site for processing and disposal.

3. If the County intends to continue processing waste tires at this site, an application for a waste tire processing facility permit must be submitted to the Department with the supporting documentation and fee. (Chapter 62-711, F.A.C.)

The Department does not intend to continue processing waste tires at the site. However, it is understood that should waste tire processing occur at the site, the Department will submit an application to obtain a waste tire processing facility permit, along with supporting documentation and fees, in accordance with Chapter 62-711, F.A.C.

4. Provide an updated map showing the locations of the groundwater monitoring wells that will continue to be sampled and a table listing the wells, well type (detection, compliance, etc.), aquifer monitored, and the sampling frequency. (Rule 62-711.510, F.A.C.)

Groundwater monitoring wells associated with the Ash Monofill shall continue to be monitored and are identified on Attachment 2. Table 1 below notes the identification number associated with each monitoring well, well type, aquifer monitored, and sampling frequency.



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Table 1. Miami-Dade Resources Recovery Facility Groundwater Monitoring Wells

Facility	Well ID	Well Type	Aquifer Monitored	Sampling Frequency
RRF Well Clusters	RR1 (15)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RR1 (30)	Monitoring Well	Biscayne Aquifer - Intermediate	Semi-Annual
	RR1 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	RR2 (15)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RR2 (30)	Monitoring Well	Biscayne Aquifer - Intermediate	Semi-Annual
	RR2 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	RR3 (15)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RR3 (30)	Monitoring Well	Biscayne Aquifer - Intermediate	Semi-Annual
	RR3 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	RR4 (20)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RR4 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	RR5 (20)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RR5 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	RR16 (15)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RR16 (30)	Monitoring Well	Biscayne Aquifer - Intermediate	Semi-Annual
	RR16 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	NW18 (20)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	NW18 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	NW46 (20)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	NW46 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
Common Well Clusters for RRF and 58th Street Landfill	RE10 (15)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RE10 (30)	Monitoring Well	Biscayne Aquifer - Intermediate	Semi-Annual
	RE10 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	NW23 (15)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	NW23 (30)	Monitoring Well	Biscayne Aquifer - Intermediate	Semi-Annual
	NW23 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	RR17 (20)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RR17 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual
	RR19 (20)	Monitoring Well	Biscayne Aquifer - Shallow	Semi-Annual
	RR19 (60)	Monitoring Well	Biscayne Aquifer - Deep	Semi-Annual

C. Southeast District

1. Will the Ash Monofill store the ash that has already been processed?

Yes, any remaining fly ash or bottom ash located at the facility will be disposed at the Ash Monofill.

2. If extending the duration of the use of metal recovery is decided (related to the Ash Monofill), an air construction permit will be required for the diesel engines.

Metals recovery has been discontinued. However, it is understood that should metals recovery be continued, the Department will submit an air construction permit application, as required.

3. If demolition activities take place, an asbestos notification must be submitted 10-days prior to the demolition starting.

Once demolition has been approved and a start date has been identified, an asbestos notification shall be submitted 10 days prior to commencement of demolition activities.

Mr. Nate Senn
Siting Coordination Office
Florida Department of Environmental Protection
April 11, 2025

4. Ensure that proper waste determinations are made on any solid waste generated by the demolition (40 CFR 262.11).

Proper waste determinations shall be made on any solid waste generated by the demolition, in accordance with 40 CFR 262.11.

5. Lead paint test should be conducted before the demolition process.

A lead paint test shall be conducted prior to commencement of demolition.

6. A separate permit will be required for the tire processing facility, since the facility will no longer be combusting.

Tire processing will no longer be conducted at the site. However, it is understood that should waste tire processing occur at the site, the Department will submit an application to obtain a waste tire processing facility permit, along with supporting documentation and fees, in accordance with Chapter 62-711, F.A.C.

7. There is no history of regulated tanks at the site. If there are tanks greater than 550 gallons above ground, or greater than 110 gallons underground, these would be regulated and would require inspection.

There are no underground tanks at the site. All the above ground storage tanks are registered under STCM Account 14224, Facility ID 9700732 issued 07/26/2024 with expiration date 06/30/2025. The FDEP Storage Registration Placard 2024-2025 is posted as required. All tanks have been emptied and decontaminated (manifests available) and they continue being inspected monthly.

We trust that the information presented herein provides sufficient information to fully address each of your comments and questions. Should you have any questions, concerns, or require additional information, please contact me.

Sincerely,



John Wong
Assistant Director, Technical Services
Department of Solid Waste Management

Email: John.Wong@Miamiidade.gov

Attachments

- 1 – Draft Miami-Dade Resources Recovery Facility Closure Plan dated April 10, 2025
- 2 – Selected Semiannual Water Quality Monitoring Reports – Permit No. 065435-006-SF

CC. Cindy Mulkey, FDEP
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