



BOARD OF COUNTY COMMISSIONERS

**Solid Waste Management Department**

2725 Judge Fran Jamieson Way  
Building A, Room 118  
Viera, Florida 32940

**Attention:** David Janson, Environmental Specialist II  
Florida Department of Environmental Protection, Central District – Orlando

**From:** Tina Ziten Lyons, Assistant Director,  
Brevard County Solid Waste Department

**Subject:** 16256 Brevard Central Landfill Warning Letter June 16, 2024 timelines

**Date:** June 28, 2024

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Dear Mr. Janson,

Per your request in the email dated June 19, 2024, Brevard County Solid Waste Department would like to share the timelines for completion of corrective actions related to the violations listed in the May 30, 2024 letter as follows:

1. **Erosion was noted along the south, east and north side slopes of cell 1 at the South Landfill**
  - a. Staff have regraded the sideslopes of the south, east and north sides with soil and sod is being placed. The sod placement began on the first week of June, so far about 54,000 square feet has been covered on the southeastern portion of the eastern sideslope and the total areas mentioned in the letter will be covered with sod.
  - b. South side has not been measured yet and should be re-sodded since Cell 3 has not been installed.
  - c. The erosion will be managed by the sod, as it takes root as a vegetative cover to hold the soil and landfill sideslopes in place.
    - From the 80-foot elevation down the soil has been for all slopes. The east slope has been sodded to the pumping station, which is half of the area. Sod has been placed on the south slope, some of which will need to be redone as Kelly wells have since been install, which is discussed below. Sod will be placed on the north slope once the east is completed. All earth and sod work is expected to be completed by September 2024.
2. **Waste was observed protruding through the side slopes along the south, east, and north sides of Cell 1 at the South Landfill.**
  - a. The sideslopes along the south, east and north sides of Cell 1 at the South Landfill were regraded, thus covering any waste that was protruding.
  - b. Staff have been directed in writing to improve site house keeping, including immediate cleanup of wind-blown litter when observed on site. Landfill operations staff have been instructed to observe heavy equipment operating and implement ongoing training and

mentoring to ensure all staff understand their role in developing the landfill according to the permit and engineered design.

- c. Staff have been instructed on application of daily and interim cover to better comply with regulations.
  - d. Staff received written notification to communicate activities on the landfill with the solid waste environment and compliance group (lead by Ms. Vicky Peña), to ensure all staff are aligned with the South Landfill operational plan, permits, and landfill build-out design.
  - e. The County is updating its methods on operating various pieces of landfill equipment to ensure safe, effective, and efficient use. Updated training profiles for staff is being overseen by internal HR and training content is being updated to reflect recent landfill management development.
  - f. The landfill operations staff, engineering, and maintenance staff must all adhere to the site operational plan and permit. Deviation from this will result in employee discipline up to the point of termination.
    - The work in addressing the erosion (by regrading) and waste removal from the sideslopes was completed in mid-June 2024.
- 3. Leachate seeps were noted along the south, east and north slopes of Cell 1 at the South Landfill.**
- a. The County has contracted Sullivan Environmental to assess the leachate impacts, make recommendation for remediation of impacted areas and mitigate ongoing seeps. The contractor recommended placing Kelly wells in areas of leachate seeps to divert leachate from surfacing, collect the leachate from the Kelly wells and pump it into the leachate collection system. A Kelly well involves digging a larger hole into the sideslope, the diameter of which is based on the size of the leachate seep, and inserting an 8” high-density polyethylene piece of pipe into the waste where leachate is mitigating to the surface, that can be fitted to a dewatering pump if needed. The pipe is perforated with holes in the lower section, which creates a preferential path for leachate collection under vacuum conditions. The pipe is placed to an optimum depth for leachate collection, while not risking the bottom liner. The area below the pipe and walls of the hole are backfilled with #67 granite stone as a filter media to keep the sump/Kelly well from silting.
  - b. A dewatering pump has been installed into this pipe and dewateres the leachate surrounding the Kelly well. The contractor is also installing a type of French drain where they are digging a trench and placing crushed concrete and #67 granite stone on the southern sideslope. Thus far, the contractor has placed 16 Kelly wells on the east side and is planning on installing about 3 or 4 Kelly wells on the north side of the landfill. There will be no wells installed on the south sideslope since that side will be connecting with cell 3, only the French drain is being placed.
    - This work is ongoing and expected to be completed in approximately 10 weeks, by the second week of September 2024.
- 4. Leachate was also noted to be mixed with storm water in the draining ditch along the south, east and north side slopes.**
- a. The stormwater ditch was blocked off in the area where leachate had entered the ditch and the contaminated stormwater was pumped into a tanker truck, which was then emptied into a lift station that connects to the sanitary sewer system. Leachate contaminated soils were removed and disposed, and the ditch was regraded with clean soil.
    - This work is ongoing.
- 5. Multiple monitoring wells were observed without a lock throughout the facilities, MW14Dr was observed with the cap broken during the time of inspection.**

- a. The wells referred to above were not groundwater monitoring wells, they were gas migration probes that do not require locks. Groundwater monitoring wells that were installed during the construction of Cell 2 were found and locks are in place for all 12 monitoring wells.
- b. The landfill operations staff have been instructed to inspect all wellheads routinely and enter any that are not locked/ are damaged/ need maintenance into the County's maintenance tracking and request system.
  - The groundwater monitoring well MW-14DR's cap has been repaired.

Overall, the Brevard County Solid Waste department is implementing a range of corrective measures, risk management and mitigation work, and improve staff training and documentation. It is our ongoing intention to work with the FDEP to address any compliance issues promptly and transparently.

Yours sincerely,



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CC: Thomas J. Mulligan, PE Department Director. Brevard County Solid Waste Department.  
Jenny Farrell, Environmental Manager. Florida Department of Environmental Protection.  
Vicky Peña, Engineer. Brevard County Solid Waste Department.