



**ENVIRONMENTAL PROTECTION and GROWTH MANAGEMENT DEPARTMENT  
ENVIRONMENTAL PLANNING and COMMUNITY RESILIENCE  
DIVISION**

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August 29, 2016

Joseph Haberfeld  
Division of Water Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road M.S. 3500  
Tallahassee, Florida 32399 -2400

Re: Monarch Hill - Application 342410-001

Dear Mr. Haberfeld,

I am writing regarding the above referenced permit application submitted by Waste Management for the construction of a Class I Injection Well System at the Monarch Hill Landfill in Broward County. Broward County's environmental and regulatory divisions have reviewed the permit application for on-site disposal of gas condensate, raw leachate, and capacity for third party liquid waste disposal, with an initial flow of 0.78 million gallons per day (MGD) and a planned capacity of 2.76 MGD. As described in the permit application, Phase I of the system is proposed to address disposal of gas condensate and raw leachate for a total volume of 300,000 gallons per day, followed with expansion over the following 6 to 12 months to accommodate third party liquid waste for a total of 780,000 gallons daily.

As the FDEP is aware, during the last decade, federal and state regulatory agencies have sought to increase water quality protections pertaining to deep injection wells in order to ensure the highest level of protection for underground sources of drinking water. As such, wastewater utilities in Broward County have augmented water quality protections, providing for primary and secondary treatment, and high-level disinfection for new wells. With an existing deep well injection system, Broward County Water and Wastewater Services already receives, treats and disposes of leachate from the Monarch Hill facility. The Monarch Hill permit application indicates the intent to receive third party waste flows in excess of that generated on-site, equivalent to more than 60% of total waste flows to be disposed of locally at Monarch Hill. It is unclear what influence these flows will have on the resultant waste stream, additional treatment that might be needed, and the potential for long-term water quality implications.

To the extent that alternative disposal strategies and water quality treatment systems are already in place and performing well, the County urges that these existing systems be employed in lieu of permitting new systems, and requests that the FDEP seek to limit expansion of deep injection well systems when viable alternatives exist.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer L. Jurado". The signature is fluid and cursive, with the first name being the most prominent.

Jennifer L. Jurado, Ph.D., Director

Cc: Bertha Henry, County Administrator, Broward County  
Henry Sniezek, Director, Environmental Protection and Growth Management Dept.,  
Alan Garcia, Director, Water and Wastewater Services