



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Citrus County Central Landfill

On-Site Inspection Start Date: 09/30/2009

On-Site Inspection End Date: 09/30/2009

ME ID#: 37479

EPA ID#: FLD982102741

Facility Street Address: 230 W Gulf To Lake Hwy, Lecanto, Florida 34461-9201

Contact Mailing Address: PO Box 340, Lecanto, Florida 34460-0440

County Name: Citrus

Contact Phone: (352) 527-7670

NOTIFIED AS:

Non-Handler

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Danielle Nichols, E.S. III

Other Participants: Rebecca Foster, E.S. I; Susan Metcalfe, Director; Carmen Bruno, Customer Service Crew Leader

LATITUDE / LONGITUDE: Lat 28° 51' 18.2815" / Long 82° 26' 18.9314"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: County

Introduction:

The Citrus County Central Landfill (C3LF) operates a household hazardous waste (HHW) facility at the landfill. They also accept and manage hazardous waste from conditionally exempt small quantity generators (CESQGs) operating within the county. In the most recent notification dated December 7, 2007 the landfill declared to be a non-handler based on their management of household hazardous waste. During discussions held subsequent to the inspection, the Department and the county agreed that they are more aptly deemed a conditionally exempt small quantity generator of hazardous waste. The solid waste director, Susan Metcalfe, and Carmen Bruno, who is a key staff member in the running of the HHW center, assisted the inspectors with the inspection.

Process Description:

The landfill facility is on county water and has two septic systems on site. There is a very small lab where varying utility operators perform process control testing on leachate, primarily testing for nitrate, ammonia and CBOD. Inspectors did not observe any hazardous waste being generated in the lab. All wastes in the lab go down the drain and to the septic system.

There is a small maintenance shop that has eight employees. There is no parts washer in the shop and no aerosol brake cleaner products were noted.

The county has regular HHW collection days and times. They encourage CESQGs to make appointments to drop off waste (rather than during the HHW times) and estimated that's the case about 60% of the time. The landfill disposes of its hazardous waste through Clean Harbors FLD 980 729 610. Upon inquiry Ms. Metcalfe said that they do not date their hazardous waste containers but ensure storage no greater than 210 days by the frequency of pickups by Clean Harbors. During the field portion of the inspection, the inspectors observed most drums did in fact have accumulation start dates marked.

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How the county verifies that the commercially-generated hazardous waste they are receiving is from CESQGs was discussed. Ms. Metcalfe explained that primarily this is accomplished by verbal discussion with the parties combined with the knowledge and scrutiny by Paul Davis and Dan Sherlock. Mr. Sherlock conducts the hazardous waste inspections in the county and thus, is familiar with the county's hazardous waste community. He also cross-references with monthly updates from the tax collector's office to identify new hazardous waste generators. Mr. Davis manages the program budget and scrutinizes disposal costs. Larger quantities are noted as part of this course of action.

Ms. Metcalfe stated that in the landfill does not knowingly accept used oil from CESQGs. There are three 400+ gallon, above ground storage tanks, located within a containment area, for the collection of used oil from the public.

New Potential Violations and Areas of Concern:**Checklist Independent Potential Violations and Areas of Concern**

Type:	Violation
Rule:	403.727(1)(b)
Explanation:	<p>Inspectors noted multiple labeled drums of hazardous waste stored on site that resulted from a September 2009 diesel spill. It was originally thought that the spill happened at the landfill property. Subsequent inquiry revealed that the spill occurred at one of the county's road maintenance satellite facilities. Six drums of diesel-contaminated asphalt and soil were brought to the landfill with the thought that the landfill staff had the contacts/relationship with the disposal company and were better able to make disposal arrangements. Mr. Stephens, the new solid waste director, informed the inspector that landfill staff deemed the cleanup material "hazardous waste". Citrus County Central Landfill is not authorized to accept hazardous waste from small quantity or large quantity generators.</p> <p>The Department observed an ammunition detonation unit or 'cooker' that is used to treat unwanted ammunition. The residual from the treatment is disposed by C3LF as hazardous waste. It was learned that some of this ammunition is collected from household residents; however some also comes from the sheriff's office, constituting unpermitted treatment of hazardous waste.</p>
Corrective Action:	<p>Note C3LF must cease acceptance of any hazardous waste from any parties other than household hazardous waste or from conditionally exempt generators within the county. C3LF must recognize that it is the responsibility of the generator of a solid waste, such as the road maintenance department, to conduct a hazardous waste determination in accordance with 40 CFR 262.11 and ensure its proper disposal under their own EPA ID number.</p> <p>Similarly C3LF has been instructed to cease acceptance/treatment of unwanted ammunition waste generated from the sheriff's office.</p>

Type:	Area Of Concern
Rule:	265.54(d)
Explanation:	.
Corrective Action:	Pages 36 and 51 of C3LF's HHW Facility Standards and Emergency Incidents Plan

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must be updated to reflect the new director as well as incorporate staff such as Dan Sherlock and Paul Davis. Please provide the updated pages to the Department for insertion into the current operating plan.

Type:	Violation
Rule:	62-710.401(6)
Explanation:	<p>A large tub and a 5-gallon bucket used to collect or accumulate used oil in the shop were not labeled. The landfill also has three 480-gallon ASTs for the storage of used oil. The labeling on two of the three tanks was not legible. (Corrected)</p> <p>A small amount of used oil was pooled in a low area within the containment area where the used oil tanks are located. Additionally two areas were noted where the paint/sealer on the containment walls was cracked and peeling. Subsequent to the inspection the Department was informed that the tanks are double-walled however after clean up of the area the county has some question as to the integrity of one of the tanks. The county has informed the Department that all three UO tanks will be removed, inspected and repaired if necessary. At the same time, the containment area will be resealed.</p>
Corrective Action:	<p>All labeling was corrected the day of the inspection.</p> <p>Please inform the Department of your findings regarding the potential leaking tank and subsequent corrective actions. With this submittal please include the name of the product used to seal the containment area.</p>

Type:	Violation
Rule:	273.14(e), 273.13(d)(1)
Explanation:	<p>Waste mercury lamps from residents and CESQGs are collected at the citizen drop-off area which is separate from the HHW center. Initially the waste lamps are stored in open-ended PVC tubes and then periodically landfill staff transfer them into cardboard boxes which are stored in a shed in the same vicinity. These boxes were also open and did not appear to be labeled. The PVC tubes were marked "Spent Fluorescent Lamps". Please note this does not technically meet the state or federal labeling requirements governing this universal waste. Again, periodically, the lamps stored in the boxes are moved to the HHW center where they are fed into a bulb crusher. Evidence of breakage was observed on the ground at the initial collection point. Inspectors also noted pieces of broken lamps and phosphor dust in the boxes which are reused.</p>
Corrective Action:	<p>Waste mercury lamps must be stored in closed containers at all times. The container must be marked with one of the following-- "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".</p>

Type:	Area Of Concern
Rule:	62-737.400(6)(b), 62-737.400(4)
Explanation:	<p>Note that written lamp handling and cleanup procedures must be maintained.</p>
Corrective Action:	<p>C3LF is hereby notified of its requirement to comply with the above-referenced regulations including training of staff in proper handling of universal waste lamps, emergency cleanup procedures and proper use of a bulb crusher.</p>

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Type: Area Of Concern

Rule: 403.727(1)(a)

Explanation: Specifically 62-730.220(5)

Corrective Action: The Department requests that more information regarding specific facility operating conditions be provided. Include a list of all hazardous waste treatment activities that are performed at C3LF as part of its management of HHW/CESQG waste that is received. For example, the use of the ammunition cooker, the similar treatment to waste flares, any acids and bases neutralization, etc.

We also suggest bulking activities such as the aerosol can puncturing system and the mercury bulb crusher be noted as part of the C3LF's operations.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 403.727(1)(b)		09/30/2009	<p>Inspectors noted multiple labeled drums of hazardous waste stored on site that resulted from a September 2009 diesel spill. It was originally thought that the spill happened at the landfill property. Subsequent inquiry revealed that the spill occurred at one of the county's road maintenance satellite facilities. Six drums of diesel-contaminated asphalt and soil were brought to the landfill with the thought that the landfill staff had the contacts/relationship with the disposal company and were better able to make disposal arrangements. Mr. Stephens, the new solid waste director, informed the inspector that landfill staff deemed the cleanup material "hazardous waste". Citrus County Central Landfill is not authorized to accept hazardous waste from small quantity or large quantity generators.</p> <p>The Department observed an ammunition detonation unit or 'cooker' that is used to treat unwanted ammunition. The residual from the treatment is disposed by C3LF as hazardous waste. It was learned that some of this ammunition is collected from household residents; however some also comes from the sheriff's office, constituting unpermitted treatment of hazardous waste.</p>

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273.14(e), 273.13(d)(1)		09/30/2009	<p>Waste mercury lamps from residents and CESQGs are collected at the citizen drop-off area which is separate from the HHW center. Initially the waste lamps are stored in open-ended PVC tubes and then periodically landfill staff transfer them into cardboard boxes which are stored in a shed in the same vicinity. These boxes were also open and did not appear to be labeled. The PVC tubes were marked "Spent Fluorescent Lamps". Please note this does not technically meet the state or federal labeling requirements governing this universal waste. Again, periodically, the lamps stored in the boxes are moved to the HHW center where they are fed into a bulb crusher. Evidence of breakage was observed on the ground at the initial collection point. Inspectors also noted pieces of broken lamps and phosphor dust in the boxes which are reused.</p>

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
265.54(d)		09/30/2009	.
62-737.400(6)(b), 62-737.400(4)		09/30/2009	Note that written lamp handling and cleanup procedures must be maintained.
403.727(1)(a)		09/30/2009	Specifically 62-730.220(5)

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Conclusion:

C3LF was found to be in violation of state and federal regulations governing universal waste generators and used oil generators, accepted unauthorized waste, and was found to be performing hazardous waste treatment that was not previously authorized.

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Danielle Nichols

PRINCIPAL INSPECTOR NAME

E.S. III

PRINCIPAL INSPECTOR TITLE*Danielle Nichols***PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

11/10/2009

DATE

Rebecca Foster

INSPECTOR NAME

E.S. I

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Susan Metcalfe

REPRESENTATIVE NAME

Director

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Division of Solid Waste

ORGANIZATION

Carmen Bruno

REPRESENTATIVE NAME

Customer Service Crew Leader

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Div. of Solid Waste

ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.