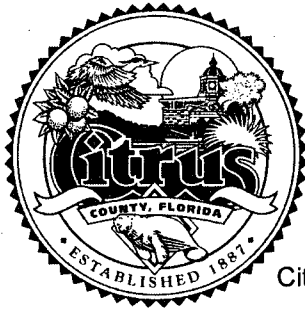


20 11/5/09



Board of County Commissioners
DEPARTMENT OF PUBLIC WORKS
SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Inglis/Yankeetown area Toll Free (352) 489-2120

October 27, 2009

John Morris
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Dept. of Environmental Protection

OCT 29 2009

Southwest District

Re: Citrus County Central Landfill
Permit No. 21375-008 SO/01
Consent Agreement: OGC Case 05-1078

Dear Mr. Morris:

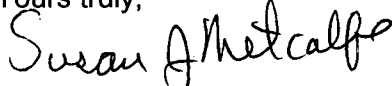
The groundwater monitoring report for the second half of 2009 was prepared by CDM on behalf of the County and was submitted to your office on October 23. We note that in addition to the issues reported in the Jones Edmunds & Associates site assessment report in the area of MW-10, there are now measured exceedences of groundwater standards in MW-13 and MW-15. The parameters of interest and the general concentration range appear to indicate that the mechanism of dissolving landfill gas in groundwater at the interface also applies to these wells.

During our meeting on September 17th, you indicated that natural attenuation was not an acceptable end point for this 62-780 site assessment effort. In addition, you indicated that either a risk assessment or remedial action would be acceptable next steps. After reviewing the situation, the County proposes to skip the risk assessment step and move forward with a proposal for a remedial action, namely a gas venting system for the closed site. We propose to run a pilot project in the area of MW-10 that could be replicated or expanded in other locations should it be warranted.

The County will proceed with contracting with the consultant who will perform this project for us and as soon as that arrangement is complete, we will schedule a meeting with the Department to discuss the proposed approach.

We believe that the County has acted timely and in good faith to meet all deadlines and suggest that this is not an issue that requires a fine and enforcement action.

Yours truly,


Susan Metcalfe, P.G.
Director

SM

CC: Glenn W. McCracken, Director, Public Works Department
Casey Stephens, Assistant Director, Solid Waste Management Division

From: Brantley, Anna
Sent: Tuesday, October 27, 2009 11:31 AM
To: Pelz, Susan; Morris, John R.; Morgan, Steve; 'Susan.Metcalf@bocc.citrus.fl.us'; 'Glenn.McCracken@bocc.citrus.fl.us'
Cc: Watson, Stephanie M.
Subject: Citrus County_Status.of.Compliance_OGC-05-1078 dated and mailed 10-27-2009.pdf (SECURED) - Adobe Acrobat Professional
Attachments: Citrus County_Status.of.Compliance_OGC-05-1078 dated and mailed 10-27-2009

Attached please find the Status of Compliance letter for OGC Case No. 05-1078 for the subject Solid Waste Facility.

NOTE: If you have questions concerning the content of this document, please contact the DEP permit processor stephanie.m.watson@dep.state.fl.us

This is the only electronic copy you will receive. Acrobat Reader 6.0 or greater is required to read this document, and is available for downloading at: <http://www.adobe.com/products/acrobat/readstep.html>

Anna

Anna Brantley
Administrative Assistant II
FL DEP / SWD / Waste Management
13051 North Telecom Parkway
Temple Terrace FL 33637-0629
Tel: 813/632-7600, Ext. 377
Fax: 813/632-7664
anna.brantley@dep.state.fl.us

Memorandum

Florida Department of Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

TO:



Deborah A. Getzoff, District Director

FROM/THROUGH:



William Kutash, Waste Program Administrator



Susan Pelz, P.E., Program Supervisor



Stephanie Watson, Enforcement Coordinator

DATE:

October 23, 2009

will not work in most instances

FILE NAME: CITRUS COUNTY BOARD OF COUNTY
COMMISSIONERS/CITRUS COUNTY
CENTRAL CLASS I LANDFILL

OGC FILE No. 05-1078

PROGRAM: SOLID WASTE/WASTE MANAGEMENT

COUNTY:

CITRUS

TYPE OF DOCUMENT:



DRAFT OR



FINAL



NOV



CONSENT ORDER



FINAL ORDER



STATUS OF COMPLIANCE LETTER



WARNING LETTER



INSPECTION REPORT

Action Required: Status of Compliance letter for your review.

Note: The Consent Agreement was executed in September 2005. This letter provides the Department's understanding of the County's compliance with the Consent Agreement. The only pending activities in the Consent Agreement are ground water site assessment activities.

Description of Violations: Exceedances of ground water standards and exceedances of the landfill gas criteria at or beyond the landfill property boundary.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Chairman John Thrumston
Citrus County
Board of County Commissioners
New Citrus County Courthouse
110 No. Apopka Avenue
Inverness FL 34450

Status of Compliance Letter
Doc Car No 05-1078

2. Article Number

(Transfer from service label)

7008 0150 0003 4893 8404

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

x *Paul New*

☒ Agent

☐ Addressee

B. Received by (Printed Name)

Paul New

C. Date of Delivery

10-29-09

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

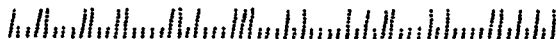
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Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Florida Department of Environmental Protection
Southwest District
c/o Stephanie Watson – Solid Waste
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

NOV 02 2009
Dept. of Environmental Protection
Southwest District



7008 0150 0003 4893 8404

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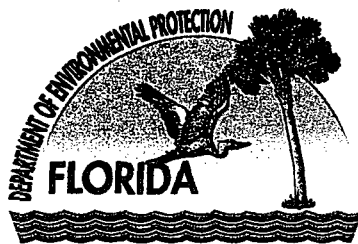
Sent To

Street, Apt. No.,
or PO Box No.
City, State, ZIP+

Chairman John Thrumston
Citrus County
Board of County Commissioners
New Citrus County Courthouse
110 No. Apopka Avenue
Inverness FL 34450

PS Form 3800, August 2006

See Reverse for Instructions



Florida Department of Environmental Protection

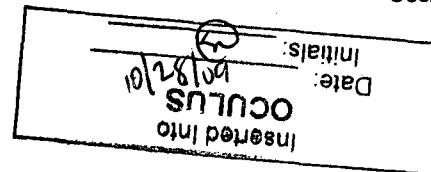
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 27, 2009



Certified Mail Return Receipt No. 7008 0150 0003 4893 8404

Chairman John Thrumston
Citrus County Board of County Commissioners
110 North Apopka Avenue
Inverness, Florida 34450

RE: Status of Compliance
Consent Agreement OGC Case No. 05-1078
Citrus County Central Class I Landfill and Closed Class I Landfill
Citrus County

Dear Chairman Thrumston:

This letter has been prepared as a follow-up to the Department's February 5, 2008 "Status of Compliance" letter and provides the Department's summary of the Citrus County Board of County Commissioner's (the County's) compliance with the Consent Agreement No. 05-1078, which was executed on September 20, 2005, as summarized below.

Paragraph 6 states "The approved 'Groundwater Investigation Plan' shall be incorporated herein and made a part of this Consent Agreement, as Exhibit A, and the Respondent shall implement the proposals in the Groundwater Investigation Plan pursuant to the approved schedule."

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because site assessment activities in accordance with Rule 62-780.600, F.A.C. have not been concluded. The Department received the submittal, "Citrus County Central Landfill, Site Assessment Report in Accordance with Chapter 62-780.600(8), F.A.C., Response to FDEP Request for Additional Information Received September 4, 2008," prepared by Jones Edmunds & Associates, Inc. (JEA), on January 27, 2009. The Department has not yet provided written comments on this submittal to the County, but discussed preliminary concerns with the County in a meeting on September 17, 2009.

Paragraph 7 states "The approved 'Landfill Gas Compliance Action Plan' shall be incorporated herein and made a part of this Consent Agreement, as Exhibit B, and the Respondent shall implement the proposals in the Landfill Gas Compliance Action Plan pursuant to the approved schedule."

Compliance Status:

- The requirements of this paragraph have been **completed**. No further action is required.

Paragraph 8 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall install and develop ground water monitoring wells MW-10 through MW-15 and MW-17 within 100 feet of the edge of waste disposal cells, conduct an "initial sampling event" at these wells, and submit a summary report of the initial sampling event results to the Department with recommendations regarding the need to conduct further assessment activities, as summarized in Exhibit A."

Compliance Status:

- The requirements of this paragraph have been **completed**. No further action is required.

Paragraph 9 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall install new landfill gas monitoring probes GP-1 through GP-18, submit a to-scale construction drawing of the new gas monitoring probes, and submit gas monitoring data results to the Department, as summarized in Exhibit B. Existing gas monitoring probes shall not be abandoned until the lease expansion agreement referenced in Paragraph 10 is submitted to the Department and the permit modification referenced in Paragraph 11.a. is issued."

Compliance Status:

- The requirements of this paragraph have been **completed**. No further action is required.

Paragraph 10 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall obtain a lease expansion agreement from the Division of Forestry/State Lands and submit a copy of this lease agreement to the Department. If the lease expansion agreement is not obtained within 90 days of the effective date of the Consent Agreement, the Department reserves the right to grant an extension of 30 days to Respondent to obtain such lease expansion agreement if an extension is warranted. If the Department grants a 30-day extension, then such 30-day extension shall automatically apply to Ordered Sections Paragraphs 11.a., 11.b., 11.c., 12.a. and 12.b."

Compliance Status:

- The requirements of this paragraph have been **completed**. No further action is required.

Paragraph 11.a. states "Within 120 days of the effective date of the Consent Agreement, Respondent shall submit an application for a permit modification to the Department that addresses changes in the facility's boundaries, zone of discharge (ZOD), monitoring well network, routine ground water sampling frequency, and landfill gas monitoring system."

Compliance Status:

- The requirements of this paragraph have been **completed**. No further action is required.

Paragraph 11.b. states "If exceedances of ground water standards (primary drinking water standards listed in Rule 62-550.310, F.A.C.) or minimum criteria as specified in Chapter 62-520, F.A.C., are reported in the initial sampling event results referenced in Paragraph 8, then within 150 days of the effective date of the Consent Agreement, the Respondent shall commence site assessment activities at the affected new wells (MW-10 through MW-15 and MW-17) at the new ZOD in accordance with Chapter 62-780, F.A.C. The Respondent shall conduct site assessment activities and submit a Site Assessment Report in accordance with the requirements of Rule 62-780.600, F.A.C., as summarized in Exhibit A."

Information Received:

- Document entitled "Citrus County Central Landfill Groundwater Investigation Report – Response to FDEP Request for Additional Information," prepared by JEA, dated September 2006, received September 15, 2006;

Department Action:

- The above document indicates that monitoring well MW-10 demonstrated exceedances of the ground water standard of 1 ug/L for vinyl chloride. The July 2006 sampling result was 5 ug/L and the August 2006 resampling result was 2 ug/L. The Department October 26, 2006 letter notified the County that site assessment activities at the affected well MW-10 were needed and that a Site Assessment Report was required to be submitted to the Department within 270 days of September 1, 2006, or by October 26, 2007.

Information Received:

- The Department received the Site Assessment Report (SAR), prepared by JEA, on October 22, 2007.

Department Action:

- The Department's September 4, 2008 letter notified the County that the SAR did not contain information adequate to support the conclusions regarding the applicable site assessment objectives in Rule 62-780.600(3), F.A.C., and that the recommendation to implement Natural Attenuation with Monitoring was not supported by the applicable criteria in Rule 62-780.600(8), F.A.C. The Department requested the submittal of a Site Assessment Report Addendum (SARA) within 60 days (by November 3, 2008) that included a recommendation to prepare either a Remedial Action Plan as required by Rule 62-780.700, F.A.C. or a risk assessment or a Risk Assessment work plan as required by Rule 62-780.650, F.A.C.

Information Received:

- On October 16, 2008, the Department received via email from JEA on behalf of the County a request for an extension until February 2, 2009 to submit the SARA. On November 4, 2008, the Department approved this request;
- On January 27, 2009, the Department received the submittal entitled, "Citrus County Central Landfill, Site Assessment Report in Accordance with Chapter 62-780.600(8), F.A.C., Response to FDEP Request for Additional Information Received September 4, 2008," (the County's SARA), prepared by JEA.

Department Action:

- On September 17, 2009, at the County's request, the Department met with the County to discuss permitting, enforcement, and compliance issues at to the Citrus County Class I Landfill and Closed Class I Landfill. During the meeting, the Department verbally provided an overview of its review comments on the County's SARA. In an October 8, 2009 email to the County, the Department summarized its review comments on the County's SARA from the September 17, 2009 meeting and indicated that the Department would provide detailed technical review comments to the County at a later date.

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because site assessment activities in accordance with Rule 62-780.600, F.A.C. have not been concluded.
- Please note that if exceedances of ground water standards or minimum criteria are reported in future routine sampling event results for compliance wells MW-11 through

MW-15 and MW-17, then the additional affected wells shall be included in site assessment activities.

Paragraph 11.c., 11.d., and 11.e. states "If exceedances of Rule 62-701.530(1)(a), F.A.C., are reported in the gas monitoring data results referenced in Paragraph 9, then within 150 days of the effective date of the Consent Agreement, the Respondent shall complete installation of passive gas vents, as described in "Phase 2" of the approved Landfill Gas ("LFG") Compliance Action Plan, at the new property boundary,...."

Compliance Status:

- The requirements of this paragraph have been **completed**. No further action is required.

Paragraph 12 states "If the lease expansion agreement referenced in Paragraph 10 is not obtained and submitted to the Department within 90 days of the effective date of this Consent Agreement, or in accordance with an extension granted by the Department..."

Compliance Status:

- This paragraph is not applicable because the lease expansion agreement was obtained. The requirements of this paragraph have been **completed**. No further action is required.

Paragraph 13 states "Upon review of the submittals required by this Consent Agreement, the Department may request additional information. All additional information shall be submitted to the Department within 30 days of receipt of the Department's written request."

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order requirement because the Department has not requested, and is not waiting on information from the County at this time.

Paragraph 14 requires the payment of \$3,000.00 in costs and expenses incurred by the Department during investigation of this matter, within 30 days of the effective date of the Consent Agreement.

Information Received:

- This payment was due to the Department on October 20, 2005. The Department received a check for \$3,000.00 from the County on August 15, 2005.

Compliance Status:

- The requirements of this paragraph have been **completed**. No further action is required.

Paragraph 15 states "Respondent agrees to pay the Department stipulated penalties in the amount of \$100.00 per day for each and every day Respondent fails to timely comply with any of the requirements of paragraphs 6-14 of this Consent Agreement..."

Department Action:

- No stipulated penalties have been assessed to date.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order requirement.

If the County has any questions about this letter, please contact me at (813) 632-7600, ext. 352, Susan Pelz, P.E., ext. 386, or Stephanie Watson, ext. 451.

Sincerely yours,



Deborah A. Getzoff
District Director
Southwest District

dag/sw

ec:

William Kutash, P.G., Waste Program Administrator, FDEP SWD

Susan Pelz, P.E., FDEP SWD

Steve Morgan, FDEP SWD

John Morris, P.G., FDEP SWD

Glenn McCracken, Director, Citrus County Public Works

Susan Metcalfe, P.G., Citrus County Solid Waste Management Division Director

Watson, Stephanie M.

From: Morris, John R.
Sent: Monday, October 19, 2009 7:37 AM
To: Watson, Stephanie M.
Cc: Pelz, Susan
Subject: FW: RE: Site Assessment Report response
Attachments: RE: Site Assessment Report response; Morris102309GWsemi.doc

Importance: High

That's an interesting development, but not an unexpected one considering previous sampling results at MW-13 and MW-15. We'll also need to check that the results for MW-18 don't raise the vertical extent issue.

John R. Morris, P.G.
FDEP SW District Office, Solid Waste Section
13051 N. Telecom Pkwy.
Temple Terrace, FL 33637-0926.
Telephone: 813-632-7600, ext. 336
E-mail: john.r.morris@dep.state.fl.us

-----Original Message-----

From: Susan Metcalfe [<mailto:Susan.Metcalfe@bocc.citrus.fl.us>]
Sent: Friday, October 16, 2009 9:06 AM
To: Pelz, Susan
Cc: Casey Stephens; Glenn McCracken; Morris, John R.
Subject: Fwd: RE: Site Assessment Report response

Susan

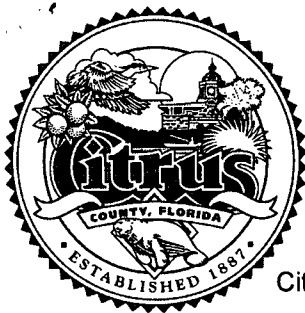
We have seen the draft groundwater report for 2nd half of 2009, although it will not be ready for another week or more to transmit to you. There are exceedences in wells other than MW-10. I wanted you to know this prior to completing the consent agreement status letter.

Our proposed plan of action is included in the attached letter. Within the next two weeks, please let us know whether this needs further discussion prior to presenting you with more details from our consultant. Thanks.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax



Board of County Commissioners

DEPARTMENT OF PUBLIC WORKS

SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Inglis/Yankeetown area Toll Free (352) 489-2120

October 16, 2009

John Morris
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Re: Citrus County Central Landfill
Permit No. 21375-008 SO/01
Consent Agreement: OGC Case 05-1078

Dear Mr. Morris:

The groundwater monitoring report for the second half of 2009 was prepared by CDM on behalf of the County and will be submitted to you shortly. We note that in addition to the issues reported in the Jones Edmunds & Associates site assessment report in the area of MW-10, there are now measured exceedences of groundwater standards in MW-13 and MW-15. The parameters of interest and the general concentration range appear to indicate that the mechanism of dissolving landfill gas in groundwater at the interface also applies to these wells.

During our meeting on September 17th, you indicated that natural attenuation was not an acceptable end point for this 62-780 site assessment effort. In addition, you indicated that either a risk assessment or remedial action would be acceptable next steps. After reviewing the situation, the County proposes to skip the risk assessment step and move forward with a proposal for a remedial action, namely a gas venting system for the closed site. We propose to run a pilot project in the area of MW-10 that could be replicated or expanded in other locations should it be warranted.

The County will proceed with contracting with the consultant who will perform this project for us and as soon as that arrangement is complete, we will schedule a meeting with the Department to discuss the proposed approach.

We believe that the County has acted timely and in good faith to meet all deadlines and suggest that this is not an issue that requires a fine and enforcement action.

Yours truly,

Susan Metcalfe, P.G.
Director

SM

CC: Glenn W. McCracken, Director, Public Works Department
Casey Stephens, Assistant Director, Solid Waste Management Division

Watson, Stephanie M.

From: Pelz, Susan
Sent: Wednesday, October 14, 2009 5:27 PM
To: Watson, Stephanie M.; Morris, John R.
Subject: FW: Site Assessment Report response

fyi

-----Original Message-----

From: Pelz, Susan
Sent: Wednesday, October 14, 2009 5:26 PM
To: 'Glenn McCracken'
Cc: Casey Stephens; Susan Metcalfe
Subject: RE: Site Assessment Report response

Glenn,

I am reviewing a draft of the "status" letter now. Since it will be sent under Deborah's signature, I hope to get it out to you early next week (as she has been out this week).

Thanks,

If you have any questions, please call or email (email is better).

Susan J. Pelz, P.E.
Solid Waste Program Manager
Southwest District
13051 N. Telecom Parkway
Temple Terrace, Fl. 33637
813-632-7600 x 386
susan.pelz@dep.state.fl.us

-----Original Message-----

From: Glenn McCracken [mailto:Glenn.McCracken@bocc.citrus.fl.us]
Sent: Friday, October 09, 2009 9:30 AM
To: Pelz, Susan
Cc: Casey Stephens; Deborah Bloss; Mary Glancy; Susan Metcalfe
Subject: RE: Site Assessment Report response

Susan,

From your below e-mail it is still my understanding that you intend on providing official correspondence to establish that the items in the July 2005 consent agreement have been addressed and deemed satisfied with the exception of the contaminant levels at MW 10. As we discussed at our joint meeting on 9/17, the county would like to establish that we have responded appropriately and timely to the consent agreement. I can appreciate your staffing levels and staff demands and the time which has elapsed since our response submittal. The county shares the same dilemma of matching available diminishing resources with priorities and increasing responsibilities. The county worked diligently to respond in an appropriate and timely fashion and in compliance with the terms of the consent agreement. I think we can all appreciate the complexity of the issues and science surrounding MW 10 and we have all worked and continue to work to a mutually satisfactory solution to the gas contaminant issue.

We intend on hiring JEA to provide an assessment of our options regarding MW-10 and then seek your department's guidance and recommendations. We would still like to establish the completion of the balance of the consent agreement. As it stands now the consent order is open ended on all items.

Please let me know your thoughts or whether my recollection of our discussion is in error.

>>> "Pelz, Susan" <Susan.Pelz@dep.state.fl.us> 10/8/2009 10:26 AM >>>

Susie,

We are involved in depositions for a hearing this week. Next week John has several day 30 or day 90 reviews/permits to complete. As you have several permit applications pending currently, I am sure that you can understand and would also prefer that those reviews are completed prior to other tasks that do not have statutory timeclocks.

The Department apologizes for the delay in providing detailed written technical review comments related to the SAR and SAR addendum. I checked our meeting notes and could not find where we committed to providing you comments on the SAR and SAR addendum within a week of that meeting, but as we discussed in the meeting, there are points in the SAR that we can agree with, and some that we do not (based on the information that was provided).

While we will provide detailed technical review comments to those submittal separately (at a later date), the following summarizes the points we discussed in the meeting:

1. The Department does not disagree that based on the information submitted the contaminants found in the groundwater are likely to have been caused by landfill gas.
2. The Department agrees that quantities of landfill gas produced or generated by the landfill should decrease over time consistent with the decay model presented. However, the Department does not agree that the groundwater data at this time supports the conclusion that a similar decrease in the constituents of concern is occurring in the groundwater in the affected locations.
3. Since the concentrations of contaminants in the groundwater is not decreasing or stable, the Department cannot agree with a Monitoring Only Natural Attenuation endpoint for the assessment.

We also discussed the possibility of the County installing a passive vent (or vents) in order to assess the effectiveness of landfill gas venting on the quality of the groundwater in the affected area. The Department has no objection to this approach and only requests that if vents are installed, the County provide the construction details of the passive gas vents, a figure showing the locations in proximity to the affected groundwater monitoring wells, and the date the vents were installed.

The Department will continue to work with the County to develop and implement appropriate assessment or corrective action activities needed to address the groundwater impacts at the facility.

If you have any questions, please call or email (email is better).

Susan J. Pelz, P.E.

Solid Waste Program Manager

Southwest District

13051 N. Telecom Parkway

Temple Terrace, Fl. 33637

813-632-7600 x 386

susan.pelz@dep.state.fl.us

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

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survey: <http://survey.dep.state.fl.us/?refemail=Susan.Pelz@dep.state.fl.us> Thank you in advance for completing the survey.

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, October 05, 2009 2:21 PM
To: Morris, John R.
Cc: Casey Stephens; Glenn McCracken; Pelz, Susan
Subject: Site Assessment Report response

John

At our meeting on the 17th, one of the topics was the site assessment report (1/26/09) and your response comments. Our recollection was that you would be able to provide the comments in written form within about a week. We have not received those comments to date. I am disappointed in the continued lack of responsiveness.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax

Glenn W. McCracken, P.E.
Director
DEPARTMENT OF PUBLIC WORKS
3600 W. Sovereign Path, Suite 212
Lecanto, Florida 34461
(352) 527-5477

Please Note: Florida has a very broad Public Records Law. Most written communications to or from State and Local Officials regarding State or Local business are public records available to the public and media upon request. Your email communications may therefore be subject to public disclosure.

Pelz, Susan

From: Pelz, Susan
Sent: Thursday, October 08, 2009 10:26 AM
To: 'Susan Metcalfe'
Cc: Casey Stephens; Glenn McCracken; Watson, Stephanie M.; Kutash, William; Morris, John R.
Subject: RE: Site Assessment Report response

Susie,

We are involved in depositions for a hearing this week. Next week John has several day 30 or day 90 reviews/permits to complete. As you have several permit applications pending currently, I am sure that you can understand and would also prefer that those reviews are completed prior to other tasks that do not have statutory timeclocks.

The Department apologizes for the delay in providing detailed written technical review comments related to the SAR and SAR addendum. I checked our meeting notes and could not find where we committed to providing you comments on the SAR and SAR addendum within a week of that meeting, but as we discussed in the meeting, there are points in the SAR that we can agree with, and some that we do not (based on the information that was provided).

While we will provide detailed technical review comments to those submittal separately (at a later date), the following summarizes the points we discussed in the meeting:

1. The Department does not disagree that based on the information submitted the contaminants found in the groundwater are likely to have been caused by landfill gas.
2. The Department agrees that quantities of landfill gas produced or generated by the landfill should decrease over time consistent with the decay model presented. However, the Department does not agree that the groundwater data at this time supports the conclusion that a similar decrease in the constituents of concern is occurring in the groundwater in the affected locations.
3. Since the concentrations of contaminants in the groundwater is not decreasing or stable, the Department cannot agree with a Monitoring Only Natural Attenuation endpoint for the assessment.

We also discussed the possibility of the County installing a passive vent (or vents) in order to assess the effectiveness of landfill gas venting on the quality of the groundwater in the affected area. The Department has no objection to this approach and only requests that if vents are installed, the County provide the construction details of the passive gas vents, a figure showing the locations in proximity to the affected groundwater monitoring wells, and the date the vents were installed.

The Department will continue to work with the County to develop and implement appropriate assessment or corrective action activities needed to address the groundwater impacts at the facility.

If you have any questions, please call or email (email is better).

Susan J. Pelz, P.E.
Solid Waste Program Manager
Southwest District
13051 N. Telecom Parkway
Temple Terrace, Fl. 33637

813-632-7600 x 386
susan.pelz@dep.state.fl.us

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, October 05, 2009 2:21 PM
To: Morris, John R.
Cc: Casey Stephens; Glenn McCracken; Pelz, Susan
Subject: Site Assessment Report response

John

At our meeting on the 17th, one of the topics was the site assessment report (1/26/09) and your response comments . Our recollection was that you would be able to provide the comments in written form within about a week. We have not received those comments to date. I am disappointed in the continued lack of responsiveness.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax



Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

DATE: 9.17.2009

TIME: 1:00

LOCATION/CONFERENCE ROOM: Room 169

MEETING SUBJECT: Citrus County Central Class I Landfill Enforcement Meeting
AND Additional Topics

ATTENDEES

Name	Affiliation	Telephone	E-mail
<u>dinah frazier</u>	<u>DEP-SWD Solid waste</u>	<u>813.632.7600 x382</u>	<u>dinah.frazier@dep.state.fl.us</u>
<u>Melissa Madden</u>	<u>FDEP Solid WASTE</u>	<u>813.632.7600 x374</u>	<u>Melissa.Madden@dep.state.fl.us</u>
<u>Susan Pelz</u>	<u>DEP-SW</u>	<u>813-632-7600 x386</u>	
<u>Stephanie Watson</u>	<u>FDEP-SW</u>	<u>" x375</u>	<u>Nancy.Gashin@ "</u>
<u>Nancy Gashin</u>	<u>FDEP-SW</u>		
<u>STEVE MORGAN</u>	<u>FDEP-SW</u>	<u>" x385</u>	<u>STEVE.MORGAN@ "</u>
<u>JOHN MORRIS</u>	<u>DEP SOLID WASTE SECTION</u>	<u>X 336</u>	<u>JOHN.R.MORRIS@dep.state.fl.us</u>
<u>Bill Gilmore</u>	<u>Citrus Co. SWM</u>	<u>352-527-7608</u>	<u>bill.gilmore@bocc.citrus.fl.us</u>
<u>Susan Metcalfe</u>	<u>Citrus Co SWM</u>	<u>352-527-7671</u>	<u>susan.metcalfe@bocc.citrus.fl.us</u>
<u>Glen W. McCracken</u>	<u>" " DPW-Admin</u>	<u>352-527-5477</u>	<u>glen.mccracken@bocc.citrus.fl.us</u>
<u>Casey Stephens</u>	<u>" "</u>	<u>352-527-7671</u>	<u>casey.stephens@bocc.citrus.fl.us</u>

CITRUS COUNTY AND DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATUS OF ISSUES DISCUSSION
September 17, 2009

INTRODUCTIONS AND POSITION/RESPONSIBILITY DESCRIPTION

①

INSPECTION AND WARNING LETTER

RECLOSURE AND GAS COLLECTION CONSTRUCTION

PHASE 3 CONSTRUCTION PERMIT

OPERATING PERMIT RENEWAL

TRANSFER STATION CONSTRUCTION

②

SITE ASSESSMENT REPORT / (CONSENT AGREEMENT)

④

LEACHATE PIPE CRUSHING

③

PROPOSED ALTERNATE USE FOR CLOSED LANDFILL

COMPOSTING REQUIREMENT 2010

75% recycling

DEP - OK w/ source of cont. is gas.

- NOT OK w/ info provided to show that concentrations decreasing
(models of LF gas production is ↓)

- ~~MM~~

NOT OK w/ NA w/ MM as mdpt.

- OK - cont. in gas to degrade over time

Nat. Attenuation with Monitoring

S.M. - Why not obvious choice?
JRM - Risk assessment approach

JRM - procedure

SSP Venting is a good idea.

S.M. 200 ft before road between MW-10 & road



SSP you may be able to risk it away?

GM do we wait?

SSP you have to do something. put in vent or risk it away.
Vent is better bet b/c you're getting rid of the g-s.

GM got us a response to SARA

SSP pick a different endpoint.

GM maybe remedial action.

Table A - Summary of Selected Analytical Results of Ground Water Samples Collected at Citrus Central Landfill, Citrus County

Parameter/ Sampling Event	Ground Water Standard	Monitor Well Identification Number												
		MW-1R B/F	MW-2 B/F	MW-3 B/F	MW-7 C/F	MW-10 C/F	MW-11 C/F	MW-12 C/F	MW-13 C/F	MW-14 C/F	MW-15 C/F	MW-17 C/F	MW-18 A/F	MW-19 A/F
pH (S.U.)														
Nov-05	6.5					5.01	7.03	6.8	5.33	6.82	4.93	5.22		
Jan-06	6.5										5.22			
Jan-06	6.5										4.93			
Jul-06	6.5	5.51	4.88	5.07	5.46	4.65	7.1	6.67	5.31	6.79	4.78	4.96		
Aug-06	6.5					4.7								
Jan-07	6.5	5.02	3.99	4.11	4.99	4.1	7.04	6.56	5.11	6.71	4.44	4.54		
Feb-07	6.5					4								
Jul-07	6.5	5.39	4.87	4.92	5.43	4.65	7.11	6.65	5.2	6.84	4.71	4.96	5.87	6.41
Jan-08	6.5	5.53	5.05	5.1	5.44	4.77	7.18	6.62	5.35	6.83	4.86	5.11	5.71	6.54
	6.5													
	6.5													
	MAXIMUM	5.53	5.05	5.1	5.46	5.01	7.18	6.8	5.35	6.84	5.22	5.22	5.87	6.54
	MINIMUM	5.02	3.99	4.11	4.99	4	7.03	6.56	5.11	6.71	4.44	4.54	5.71	6.41
Iron (mg/L)														
Nov-05	0.3					0.17	0.054	5.6	0.14	0.19	0.64	0.84		
Jan-06	0.3													
Jan-06	0.3													
Jul-06	0.3	0.027	0.027	0.027	0.027	1.39	0.027	6.71	0.583	0.137	1.35	6.08		
Aug-06	0.3					1.02								
Jan-07	0.3	0.0467	0.0346	0.0038	0.0162	1.61	0.0212	6.49	1.35	0.148	1.99	5.86		
Feb-07	0.3													
Jul-07	0.3	0.0038	0.027	0.00847	0.0038	4.49	0.0225	6.1	2.02	0.113	3.29	7.57		
Jan-08	0.3	0.0014	0.0222	0.0014	0.0241	4.02	0.0208	9.47	2.36	0.105	3.48	7.6		
	0.3													
	0.3													
	MAXIMUM	0.0467	0.0346	0.027	0.027	4.49	0.054	9.47	2.36	0.19	3.48	7.6	0	0
	MINIMUM	0.0014	0.0222	0.0014	0.0038	0.17	0.0208	5.6	0.14	0.105	0.64	0.84	0	0
Benzene (µg/L)														
Nov-05	1					0.2	0.05	0.05	0.05	0.05	0.5	0.6		
Jan-06	1													
Jan-06	1													
Jul-06	1	0.05	0.05	0.05	0.05	2	0.05	0.05	0.05	0.05	0.6	0.05		
Aug-06	1					1								
Jan-07	1	0.24	0.24	0.24	0.24	1.4	0.24	0.24	0.24	0.24	0.49	0.24		
Feb-07	1					1.1								
Jul-07	1	0.16	0.16	0.16	0.16	2.5	0.16	0.45	0.93	0.24	0.24	0.99	0.83	0.35
Jan-08	1	0.17	0.17	0.17	0.17	2.5	0.17	0.17	0.58	0.17	0.17	0.66	0.44	0.17
	1													
	1													
	MAXIMUM	0.24	0.24	0.24	0.24	2.5	0.24	0.45	0.93	0.24	0.6	0.99	0.83	0.35
	MINIMUM	0.05	0.05	0.05	0.05	0.2	0.05	0.05	0.05	0.05	0.17	0.05	0.44	0.17

Table A - Summary of Selected Analytical Results of Ground Water Samples Collected at Citrus Central Landfill, Citrus County

Parameter/ Sampling Event	Ground Water Standard	Monitor Well Identification Number												
		MW-1R B/F	MW-2 B/F	MW-3 B/F	MW-7 C/F	MW-10 C/F	MW-11 C/F	MW-12 C/F	MW-13 C/F	MW-14 C/F	MW-15 C/F	MW-17 C/F	MW-18 A/F	MW-19 A/F
Methylene chloride (µg/L)														
Nov-05	5					1	0.5	0.5	0.5	0.5	0.5	0.5		
Jan-06	5													
Jan-06	5													
Jul-06	5	0.5	0.5	0.5	0.5	6	0.5	0.5	0.5	0.5	0.5	5		
Aug-06	5					5								
Jan-07	5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5		
Feb-07	5					0.5								
Jul-07	5	0.095	0.095	0.095	0.095	4.5	0.095	0.095	0.095	0.5	0.5	0.095		
Jan-08	5	0.245	0.245	0.245	0.245	0.245	0.245	0.245	0.245	0.245	0.245	0.245	0.245	0.245
	5													
	5													
	MAXIMUM	0.5	0.5	0.5	0.5	6	0.5	0.5	0.5	0.5	0.5	5	0.245	0.245
	MINIMUM	0.095	0.095	0.095	0.095	0.245	0.095	0.095	0.095	0.245	0.245	0.095	0.245	0.245
Vinyl chloride (µg/L)														
Nov-05	1					0.25	0.25	0.25	0.8	0.25	2	0.25		
Jan-06	1										0.25			
Jan-06	1										1			
Jul-06	1	0.25	0.25	0.25	0.25	5	0.25	0.25	0.25	0.25	1	0.25		
Aug-06	1					2								
Jan-07	1	0.26	0.26	0.26	0.26	2.5	0.26	0.26	1.1	0.26	0.91	0.26		
Feb-07	1					1.2								
Jul-07	1	0.455	0.455	0.455	0.455	2.3	0.455	0.455	0.455	0.26	0.64	0.455	0.455	0.455
Jan-08	1	0.455	0.466	0.455	0.455	5.4	0.455	0.455	0.455	0.455	0.455	0.455	1.1	0.455
Mar-08	1												0.455	
	1													
	1													
	MAXIMUM	0.455	0.466	0.455	0.455	5.4	0.455	0.455	1.1	0.455	2	0.455	1.1	0.455
	MINIMUM	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.455	0.455

NOTE: FOR THE PURPOSES OF THIS TABLE, THOSE PARAMETERS REPORTED AS "BDL" ARE PRESENTED AT HALF THE DETECTION LIMIT

Analytical Results Summary for Ground Water Samples Collected at Class I/III Landfills

Facility Name -- Citrus Central Landfill

Analytical Laboratory -- ENCO Lab

Filtered Metals -- N Equipment Blank -- Y

(Filtered @ MW-10 and resample at MW-10)

Duplicate --N

County -- Citrus

Date Sampled -- 1/21 to 1/23/08

GW Contour Map -- Y

Sampling Frequency -- semi-annually

Date Received -- 6/5/08

Exceedances summarized -- Y

PARAMETERS	Ground Water Standard	Monitor Well Identification Number														Notes (as needed)
		MW-1R B/F	MW-2 B/F	MW-3 B/F	MW-6 I/F	MW-7 B/F	MW-10 C/F	MW-11 C/F	MW-12 C/F	MW-13 C/F	MW-14 C/F	MW-15 C/F	MW-17 C/F	MW-18 A/F	MW-19 A/F	
Field Measurements		4.71	5.71	NA	5.91	5.57	5.77	4.77	4.91	5.05	4.85	5.12	5.04	5.58	5.73	W/L from day of sampling
Water Level Elevation	NE	4.8	5.72	NA	5.9	5.47	5.64	4.79	4.95	5.05	4.85	5.12	5.04	5.48	5.65	W/L from contour map
pH (Std. Units)	6.5 - 8.5	5.53	5.05	5.1	4.23	5.44	4.77	7.18	6.62	5.35	6.83	4.86	5.11	5.71	6.54	
Turbidity (NTU)	20*	0.36	0.22	0.41	0.34	2.87	51.4	1.18	4.31	4.05	0.76	3.31	4.33	45	11.5	GW ELEV @ 1/21/08
Conductivity (µmhos/cm)	NE	99	26	33	548	115	56	364	693	87	508	44	66	269	117	MW-4R -- 6.0
Dissolved Oxygen (mg/L)	<20% sat*	3.68	5.08	5	0.15	0.2	0.17	0.87	0.11	0.15	0.2	0.18	0.22	0.52	5.75	MW-5 -- 5.83
Temperature (°C)	NE	23	22.1	21.24	23.64	22.74	23.16	23.51	24.06	23.24	23.02	22.14	23.36	21.84	23.2	MW-8R -- 4.65
ORP (mV)	NE	240.2	205.6	289.7	355	187.8	94.1	56.6	-124.7	-5.3	-14.2	79.6	32.6	164.9	132.9	MW-9 -- 4.50
Metals/Semimetals																MW-16 -- 4.99
Antimony (mg/L)	0.006	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082			MW-AA -- 4.64
Arsenic (mg/L)	0.01	0.00275	<0.0011	0.00244	0.0027	0.00472	<0.0011	<0.0011	0.00403	0.00375	<0.0011	0.00407	0.00221			MW-B -- 4.8
Cadmium (mg/L)	0.005	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082	<0.00082			MW-E -- 4.66
Chromium (mg/L)	0.1	0.00169	<0.00069	0.00124	0.00194	0.00134	<0.00069	<0.00069	<0.00069	<0.00069	<0.00069	<0.00069	<0.00069			PZ-1 -- 4.91
Iron (mg/L)	0.3	<0.0028	0.0222	<0.0028	0.0914	0.0241	4.02	0.0208	9.47	2.36	0.105	3.48	7.6			PZ-2 -- 4.69
Lead (mg/L)	0.015	0.000614	<0.0005	0.00933	0.00106	0.000706	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005			
Mercury (mg/L)	0.002	<0.000009	<0.000009	<0.000009	0.00002	<0.000009	<0.000009	<0.000009	<0.000009	<0.000009	<0.000009	<0.000009	<0.000009			
Nickel (mg/L)	0.1	0.00525	<0.0005	0.0014	0.0158	0.00212	0.00851	0.000907	0.00378	0.00601	0.00374	0.00289	0.00375			
Selenium (mg/L)	0.05	<0.0031	<0.0031	<0.0031	<0.0031	<0.0031	<0.0031	<0.0031	<0.0031	<0.0031	<0.0031	0.00733	<0.0031			
Sodium (mg/L)	160	7.36	3.19	2.87	76	20.1	5.24	3.1	2.65	3.9	2.73	1.86	3.62			
Thallium (mg/L)	0.002	<0.0002	<0.0002	<0.0002	0.000409	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	0.000276	<0.0002	<0.0002			
Vanadium (mg/L)	0.049**	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005			
Zinc (mg/L)	5	0.0264	0.0332	0.0525	0.0275	0.0251	0.0263	0.0166	0.0135	0.0286	0.0114	0.044	0.0216			
Inorganics																
Ammonia (mg/L)	2.8**	<0.008	<0.008	<0.008	0.49	<0.008	<0.008	<0.008	0.81	<0.008	<0.008	0.016	0.011			
Chlorides (mg/L)	250	4.9	3.3	4.3	120	6	5.6	4.8	4	4.7	4.1	2.8	3.3			
Nitrate (mg/L)	10	3.4	0.16	0.23	7.8	0.16	0.15	0.23	<0.008	0.15	0.17	0.15	0.15			
Total Dissolved Solids (mg/L)	500	88	22	50	310	100	46	200	390	70	280	30	30			
Organics																
Acetone (µg/L)	6300**	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74			
Benzene (µg/L)	1	<0.34	<0.34	<0.34	1.2	<0.34	2.5	<0.34	<0.34	0.58	<0.34	<0.34	0.66	0.44	<0.34	
Chlorobenzene (µg/L)	100	<0.27	<0.27	<0.27	<0.27	<0.27	0.6	<0.27	0.28	<0.27	<0.27	<0.27	0.67			
Chloromethane (µg/L)	2.7**	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37			
1,2-dichlorobenzene (µg/L)	600	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33			
1,4-dichlorobenzene (µg/L)	75	<0.33	<0.33	<0.33	<0.33	<0.33	5.5	<0.33	2.4	2.9	<0.33	0.53	1.7			
1,1-dichloroethane (µg/L)	70**	<0.35	<0.35	<0.35	1.8	<0.35	2.4	<0.35	<0.35	0.44	<0.35	<0.35	<0.35			
1,2-dichloroethane (µg/L)	3	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39			
1,1-dichloroethene (µg/L)	7	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46			
cis-1,2-dichloroethene (µg/L)	70	<0.34	<0.34	<0.34	2.1	<0.34	12	<0.34	0.65	1.9	<0.34	3.7	<0.34			
Ethylbenzene (µg/L)	30	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36			
Methylene chloride (µg/L)	5	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	
Tetrachloroethene (µg/L)	3	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47			
Toluene (µg/L)	40	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38			
Total Xylenes (µg/L)	20	<0.52	<0.52	<0.52	3.9	<0.52	6.4	<0.52	<0.52	<0.52	<0.52	<0.52	<0.52			
Total TTHMs *** (µg/L)	80	<1.14	4.2	0.77	12.04	<1.14	<1.14	<1.14	<1.14	<1.14	<1.14	<1.14	<1.14			
Trichloroethene (µg/L)	3	<0.3	<0.3	<0.3	0.59	<0.3	0.47	<0.3	<0.3	0.3	<0.3	1.5	<0.3			
Vinyl Chloride (µg/L)	1	<0.91	<0.91	<0.91	3.2	<0.91	5.4	<0.91	<0.91	<0.91	<0.91	<0.91	<0.91	1.1	<0.91	
Vinyl Chloride (µg/L)	1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.91	NA	Resample MW-18 on 3/24/08

Monitor Well Descriptions: B = background; C = compliance; D = detection; A = assessment /// S = surficial aquifer; I = intermediate aquifer (confined); F = Floridan aquifer

NE = not established

NA = not analyzed

NS = not sampled

* = SOP FS 2200 (Ground water sampling)

** = minimum criteria (Chapter 62-777, F.A.C.)

*** TTHMs = sum of bromodichloromethane, dibromochloromethane, bromoform, chloroform

NOTE: THIS REPRESENTS A ROUTINE SAMPLING EVENT AT THESE WELLS

NOTE: WELLS MW-10, MW-15 AND MW-17 WERE NOT COMPLETED IN LIMESTONE

Watson, Stephanie M.

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Tuesday, August 04, 2009 3:44 PM
To: Morris, John R.; Watson, Stephanie M.; Pelz, Susan
Cc: Glenn McCracken
Subject: Site Assessment Report Additional Information

Susan

Jones, Edmunds and Associates prepared the groundwater site assessment report (dated 10/26/2007) for the Citrus County Landfill as required in the 2005 consent agreement between the County and the Department. Your request for additional information was issued September 4, 2008. The additional information was submitted to your office on January 26, 2009. When can we expect to receive your response? Do we need to schedule a meeting?

I will be retiring at the end of October and would appreciate having this issue resolved prior to that time.

In any case, I would like to schedule a meeting after Mr. Casey Stephens, my replacement, starts work in September to discuss the status of all permitting and compliance issues.
Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax



January 26, 2009

Susan Pelz, P.E.
Southwest District
Florida Dept. of Environmental Protection
13051 North Telecom Pkwy.
Temple Terrace, FL 33637

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

JAN 27 2009

SOUTHWEST DISTRICT
TAMPA

RE: Citrus County Central Landfill
Consent Agreement OGC Case No. 05-1078
62-780 Site Assessment Report Request for Additional Information
Jones Edmunds Project No.: 03860-036-01

Dear Susan:

Jones Edmunds, on behalf of Citrus County, is providing 4 copies of the Citrus County Central Landfill Site Assessment Report Request for Additional Information. These documents are signed and sealed by John Catches, P.G.

If you have any questions concerning these documents, please call me at (352) 377-5821 ext. 5375.

Sincerely,

A handwritten signature in black ink, appearing to read "Troy Hays".

Troy Hays
Project Manager

\\Gnv-projects\projects\03860-CitrusCounty\036-01-Citrus SAR RAI\CORR\2009-01-26-LTR-SPelz-FDEP-CitrusSAR-RAI.doc

Enclosures

xc: John Morris, FDEP
Susan Metcalfe, Citrus County

730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352.377.3166 Fax
www.jonesedmunds.com

file copy

**CITRUS COUNTY CENTRAL LANDFILL
SITE ASSESSMENT REPORT
IN ACCORDANCE WITH
CHAPTER 62-780.600(8) FAC**

Dept. of Environmental Protection

**RESPONSE TO FDEP REQUEST
FOR ADDITIONAL INFORMATION**

JAN 27 2009

Southwest District

RECEIVED SEPTEMBER 4, 2008

Prepared for:

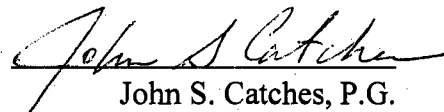
**CITRUS COUNTY BOARD OF
COUNTY COMMISSIONERS**

Prepared by:

JONES EDMUNDS & ASSOCIATES, INC.
730 NE Waldo Road
Gainesville, Florida 32641

P.E. Certificate of Authorization #1841
P.G. Certificate of Authorization #133

January 2009


John S. Catches, P.G.
Florida P.G. No. 2203
1/22/09

Watson, Stephanie M.

From: Watson, Stephanie M.
Sent: Tuesday, November 04, 2008 10:14 AM
To: 'carmen.bruno@bocc.citrus.fl.us'
Cc: Pelz, Susan
Subject: FW: Citrus Central Landfill 62-780 Site Assessment Report Addendum

FYI – Since Susie is out of the office.

Stephanie Watson

Florida Department of Environmental Protection, Southwest District, Solid Waste Section
Telephone: 813-632-7600, ext. 451; Fax: 813-632-7664; E-mail: stephanie.m.watson@dep.state.fl.us

From: Watson, Stephanie M.
Sent: Tuesday, November 04, 2008 10:11 AM
To: 'thayes@jonesedmunds.com'
Cc: Morris, John R.; Pelz, Susan; Brown, Thomas H.; Susie Metcalfe (Susan.Metcalfe@bocc.citrus.fl.us)
Subject: RE: Citrus Central Landfill 62-780 Site Assessment Report Addendum

Troy:

The Department apologizes for the delay in responding to your email below.

The Department does not object to an extension of time to submit the Citrus County Site Assessment Report Addendum (SARA) that was due November 3, 2008.

The Department looks forward to receiving the SARA by February 2, 2009.

If you have any questions, please contact me.

Thank you,

Stephanie

Stephanie Watson

Florida Department of Environmental Protection, Southwest District, Solid Waste Section
Telephone: 813-632-7600, ext. 451; Fax: 813-632-7664; E-mail: stephanie.m.watson@dep.state.fl.us

From: Morris, John R.
Sent: Tuesday, October 21, 2008 3:14 PM
To: Watson, Stephanie M.
Subject: FW: Citrus Central Landfill 62-780 Site Assessment Report Addendum

FYI.

From: Troy Hays [mailto:]
Sent: Thursday, October 16, 2008 8:36 AM
To: Pelz, Susan
Cc: Morris, John R.;
Subject: Citrus Central Landfill 62-780 Site Assessment Report Addendum

Good Morning Susan,

As was requested in the meeting on September 29, 2008 between Citrus County and the FDEP concerning the on-going site assessment at the Citrus County Central Landfill; the County is prepared to conduct speciation sampling of the landfill gas in groundwater monitoring well MW-10. A lab has been identified that can perform the analyses and progress is being made in formulating the methodology to collect the sample.

We are requesting an extension of the deadline for submittal of the site assessment report addendum that is due November 2, 2008 so that the results of the landfill gas sampling can be included. The site assessment report addendum will be submitted to FDEP no later than February 2, 2009.

Please reply to this email if the FDEP finds the new deadline acceptable or give me a call at 352-258-9520 to discuss further.

Thanks for your continued assistance with this matter,

Troy Hays
Geologist

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730 NE Waldo Road
Gainesville, FL 32641
Phone 352-377-5821 Ext. 5375
Fax 352-377-3166
Mobile 352-258-9520
www.jonesedmunds.com

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Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

DATE: 9/29/08

TIME: _____

LOCATION/CONFERENCE ROOM: _____

MEETING SUBJECT: Citrus SAR

ATTENDEES

Name	Affiliation	Telephone	E-mail
<u>Susan Pelz</u>	<u>DEP</u>	<u>813-632-7600 x 386</u>	_____
<u>Susan Metcalfe</u>	<u>Citrus County</u>	<u>352-527-7671</u>	_____
<u>GLENN MCCracken</u>	<u>" " - DPW</u>	<u>352-527-5477</u>	_____
<u>Dominique Brankett</u>	<u>SCS Engineer</u>	<u>813-621-0080</u>	_____
<u>John Banks</u>	<u>" "</u>	<u>" "</u>	_____
<u>Tom Brown</u>	<u>Jones Edmunds</u>	<u>352-577-5821</u>	_____
<u>Troy Hays</u>	<u>Jones Edmunds</u>	<u>352-377-5821</u>	_____
<u>John Morris</u>	<u>DEP SOLID WASTE SECTION</u>	<u>813-632-7600 x 336</u>	_____
<u>Steve Morgan</u>	<u>" "</u>	<u>x385</u>	_____

Agenda for the Citrus County Central Class I Landfill Site Assessment Report FDEP
Request for Additional Information meeting.

Meeting date—September 29, 2008 at 10:45 A.M.

Location—Southwest District FDEP office

TECHNICAL ISSUES – LF GAS AS MECHANISM FOR GROUNDWATER
CONTAMINATION

1. Discussion of source of contamination.
 - a. Analytical parameters found in MW-10 compared to leachate results.
 - b. Historical LFG at the site.
 - c. Additional investigation—Demonstrate the gas is present in the vicinity of MW-10 and analysis of the gas venting system.
2. Overall Decrease in Contaminant Concentrations
 - a. Review of Historical GW data.
 - b. Discussion of local gradient.
 - c. Discussion of contaminates parent constituents.
 - d. Landfill Gas measurements of Methane
3. Groundwater Capacity to Degrade
 - a. Benzene/Vinyl Chloride requirements for degradation
 - b. Oxidation-Reduction Potential measurements
 - c. Dissolved Oxygen
4. Contaminant Discharge Location Maps

62-780 PROCESS MATRIX

1. Department describe where they think we are now
2. Current choices
3. Potential future activities, timetables, choices
 - a. MNA
 - b. Active Remediation-Installation of LFG Vents
 - c. Risk Assessment-Propose Alternate CTL's

SPECIFIC QUESTIONS RESPONSES

1. Ask for input as to preferred content or format of presentation for individual responses.
2. Fewer paper copies if 1 electronic?

QUESTION #1 The landfill is the Source, but is Gas the Mechanism of Transport?

- * Chloride
- * Solubility/Boiling Point/Vapor Pressure
- * Polarity and 1,4-DCB
- * Carbon Dioxide

Table 1: Selected VOC Characteristics

Parameter	Vapor Pressure (mmHg)	Solubility (%)	Boiling Point (F)
1,4-Dichlorobenzene	1.3	0.008	345
1,2-Dichlorobenzene	1	0.01	357
Chlorobenzene	9	0.05	270
Benzene	75	0.07	176
Toluene	21	slight	232
Ethylbenzene	7	0.01	277
m-Xylene	9	slight	282
o-Xylene	7	0.02	292
p-Xylene	9	0.02	281
Tetrachloroethene	14	0.02	250
Trichloroethene	58	slight	189
1,1-Dichloroethene	500	0.04	89
cis-1,2-Dichloroethene	180-265	0.4	118-140
trans-1,2-Dichloroethene	180-265	0.4	118-140
1,1-Dichloroethane	182	0.6	135
1,2-Dichloroethane	64	0.9	182
Vinyl Chloride	2508	slight	7

Data from the NIOSH Pocket Guide to Chemical Hazards

Table 2. VOC ranges detected in MW-10 compared to leachate

MW-10	ug/L			ug/L
2006-2009	Benzene	0.2-2.5	Vinyl Chloride	ND-5.4
	Chlorobenzene	ND-BDL	cis-1,2-Dichloroethene	BDL-12
	1,4-Dichlorobenzene	4.0-6.0	trans-1,2-Dichloroethene	ND
	Toluene	ND	1,1-Dichloroethane	ND-2.4
	Ethylbenzene	ND	Trichloroethene	ND-BDL
	Xylenes	ND-9.3	Tetrachloroethene	ND

Untreated Leachate	ug/L			ug/L
2000-2008	Benzene	ND-34	Vinyl Chloride	ND-17
	Chlorobenzene	ND-3.5	cis-1,2-Dichloroethene	ND-6
	1,4-Dichlorobenzene	ND-15	trans-1,2-Dichloroethene	ND
	Toluene	ND-110	1,1-Dichloroethane	ND-5.8
	Ethylbenzene	ND-62	Trichloroethene	ND-BDL
	Xylenes	ND-84	Tetrachloroethene	ND-1.2

(ND = Non-Detect; BDL = Below Detection Limit)

Table 3: Comparison of Leachate Indicators to Groundwater Background and MW-10

leachate

	Chloride (mg/L)		Sodium (mg/L)		TDS (mg/L)	
	Range	Average	Range	Average	Range	Average
Pre-Treatment	380-1200	714	252-810	554	1300-3300	2318
Post-Treatment	370-1400	900	343-746	541	950-2900	2035
Background	ND-31	5.5	ND-90.8	13.6	ND-3760	133
MW-10	3.5-6.8	6.1	3.5-6.1	5.14	30-114	63

	Ammonia (mg/L)		Benzene (ug/L)		VC (ug/L)	
	Range	Average	Range	Average	Range	Average
Pre-Treatment	12-740	264	ND-34	7	ND-17	3.4
Post-Treatment	0.02-13	1.5	(ND)	(ND)	(ND)	(ND)
Background	ND-0.88	0.07	(ND)	(ND)	(ND)	(ND)
MW-10	ND-0.039	0.01	0.2-2.5	1.5	ND-5.4	2.4

Note: Data from 2000 to 2008

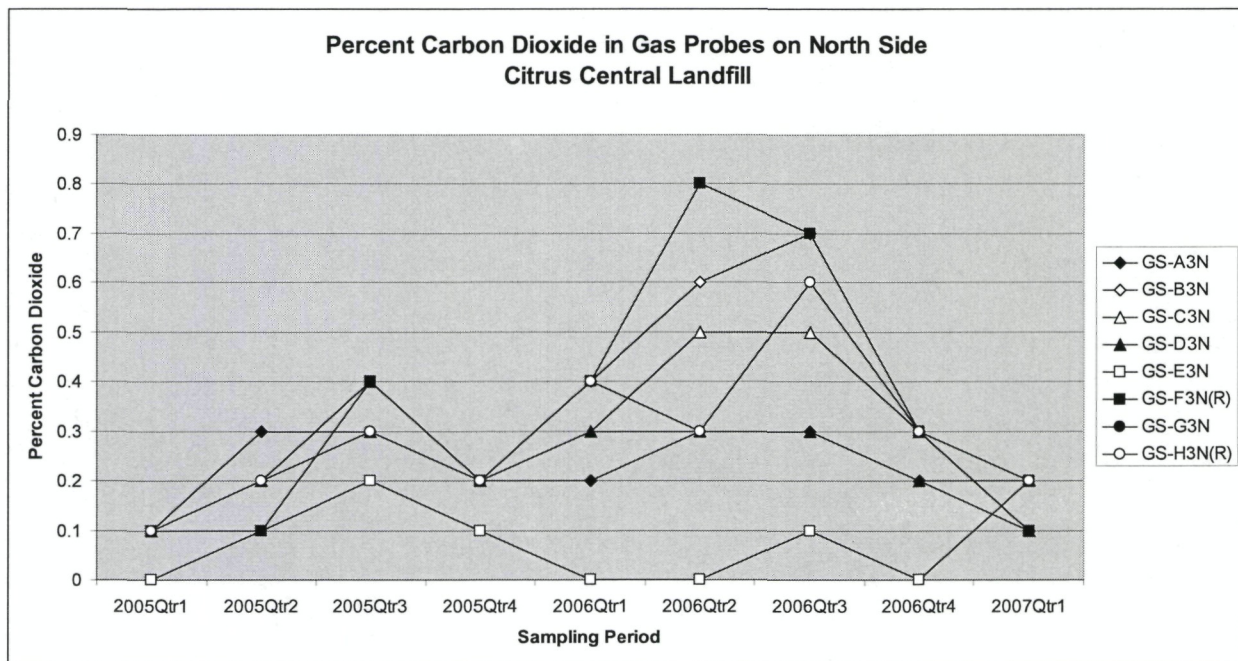


Figure 1: Carbon Dioxide Measurements from the GS(N) Series Probes

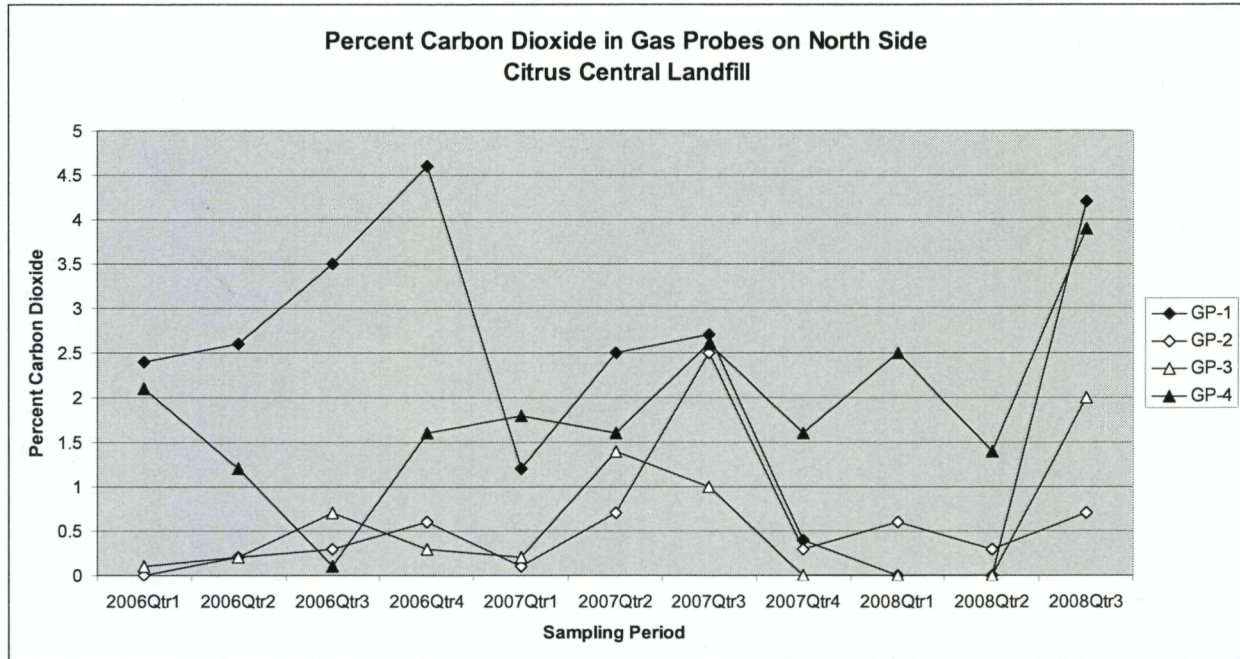
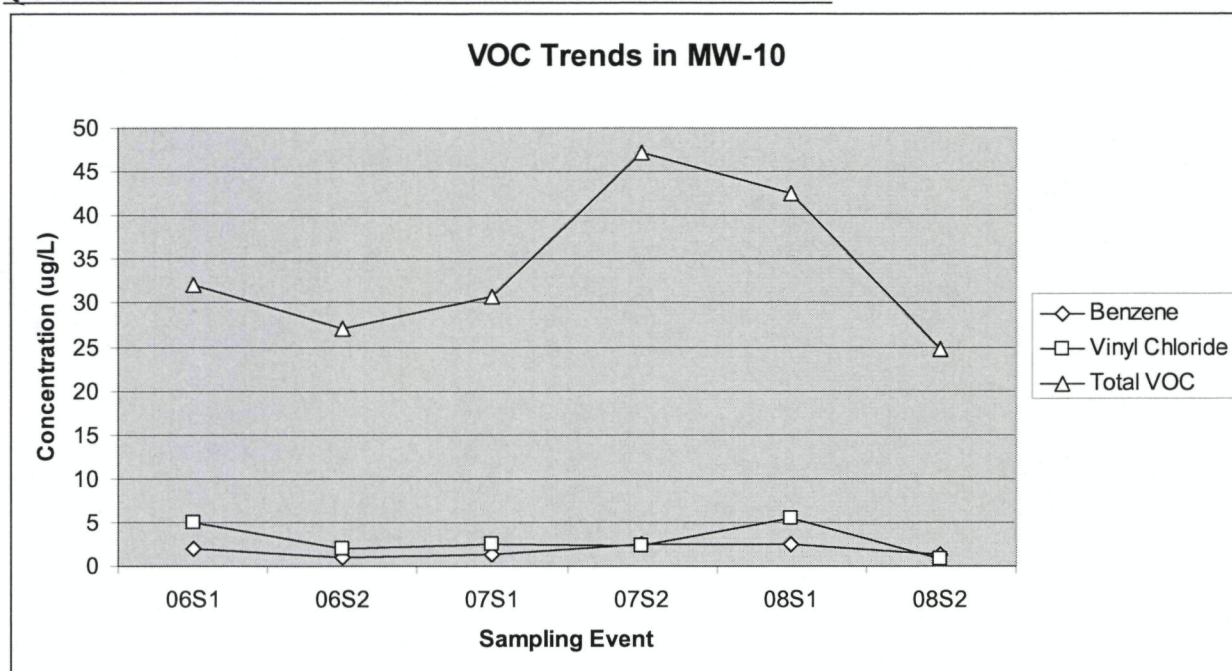


Figure 2: Carbon Dioxide Measurements from GP-1 through GP-4

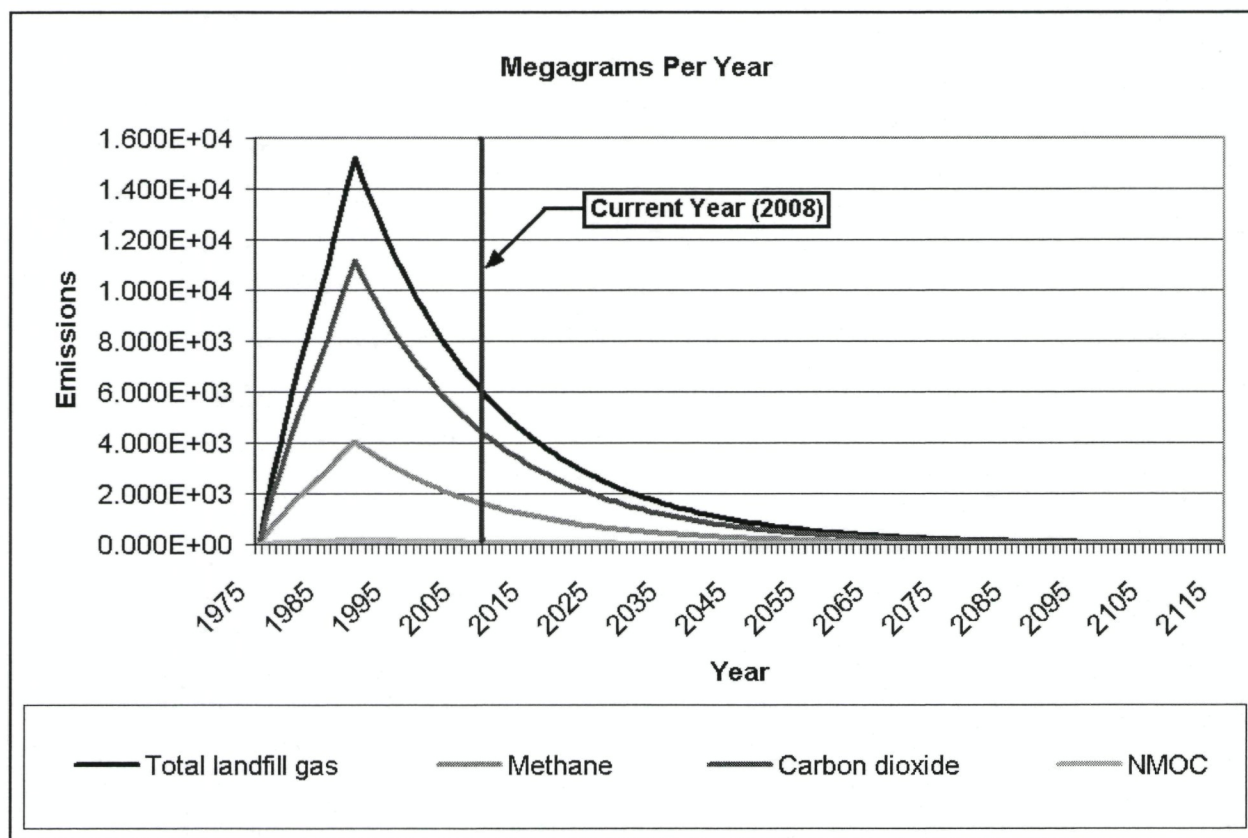
Table 4: March 2, 2006 Gas Measurements

(%gas)	CH4	CO2	O2
MW-10	0	1.7	18.9
MW-14	0	0.2	19.7
MW-15	0	0.6	20
MW-17	0	6.2	13.4

QUESTION # 2 Is There an Overall Decrease in Contamination



LandGEM (EPA 2005) Landfill Gas Production Model



QUESTION #3 Environmental Capacity to Degrade COCs

Geochemical indicators show a relatively oxidated environment: ORP, D.O., Nitrogen

→The screened interval for MW-10 is NOT conducive to determine the equilibrium (ambient) groundwater conditions. A screen across the water table is, by definition, in disequilibrium. Therefore, the conditions found in the deeper well at this location (MW-19) are more accurate in determining the geochemical nature of the ambient groundwater.

Required: Destructive attenuation.

(Volatilization and dilution are not the solution)

Biodegradation destroys VOC by metabolic mineralization (resulting in Carbon Dioxide, water, and energy)

PCE and TCE→electron acceptor (stable under aerobic, but susceptible to halorespiration (reductive dechlorination) under anaerobic conditions)

Cis-1,2-Dichloroethene→both electron acceptor and donor

cis:trans DCE ratios prove that the more chlorinated ethenes are being broken down biologically.

Vinyl Chloride→both electron acceptor and donor

Is biologically available to both aerobic and anaerobic bacteria, but will degrade faster under aerobic conditions due to faster metabolism of aerobic bacteria.

Benzene→Electron donor

(Will biodegrade under both reducing and oxidizing conditions—best way to degrade Benzene is to make sure bacteria don't have an alternative, higher thermodynamic, energy source, though they may require an additional electron acceptor—such as an equal amount of Vinyl Chloride.)

SITE EXAMPLES OF GAS TO GROUNDWATER
IMPACT

INDIANA

Bartholomew County
COC: VOC
(migration through karst)

Caldwell Landfill
COC: VOC
(upgradient issue)

Clinton County Landfill (aka Montgomery Brothers,
Midwest Disposal)
COC: VOC

Elkhart County Landfill
COC: VOC (subliner trash)

Gary Landfill
COC: VOC

Gibson County Landfill
COC: VOC

Randolph Farms
COC: VOC

Uniontown Landfill
COC: VOC

United Refuse
COC: VOC

Whitley County Landfill
COC: VOC
(Condensation problem)

FLORIDA

Baker Landfill (Okaloosa County)
COCs: Iron, Arsenic, VOC

Baseline Landfill (Marion County)
COCs: VOC

Davis Landfill (Marion County)
COCs: VOC, Arsenic

Suwannee County Landfill
COC: Arsenic

9/29/03

CITRUS CENTRAL LANDFILL MEETING

PART II - SAR REVIEW COMMENTS

SAR LETTER

COMMENT #

1-A
1-B
1-C

SAR COMMENTS MEMO BY JRM - MINOR COMMENTS MOSTLY, SLOG TESTS, FIG 5-1 (CLOUT CASE RESULTS)

SAR LETTER COMMENTS BY STP

1B - LF IS SOURCE OF GW CONTAMINATION (NO ARGUMENT)

- VAPOR PRESSURE / SOLUBILITY / BOILING POINTS INFORMATION PRESENTED FOR VOC'S

- COMPARISON OF GW CONSTITUENTS VS. LEACHATE

- 1,4-DICHLOROBENZENE SEEMS LIKE AN OUTLIER FOR THE ^{LANDFILL} GAS AS THE MECHANISM FOR TRANSPORT; NEED TO LOOK AT SOLUBILITY IN GAS RATHER THAN SOLUBILITY IN WATER

- LOW SOLUBILITY OF 1,4-DICHLOROBENZENE IN WATER WOULD HAVE IT OCCUR IN A SEPARATE PHASE (LOW SOLUBILITY IN WATER)

- GAS OCCURRING W/IN LANDFILL UNDER PRESSURE WILL CAUSE 1,4-DICHLOROBENZENE TO BE PART OF LF GAS EXHAUSTING FROM FOOTPRINT

- 1,4-DICHLOROBENZENE IS A NON-POLAR GAS; MORE SOLUBLE IN COLDER WATER, CAN BE MORE SOLUBLE IN GW OUTSIDE LANDFILL THAT IS COOLER

→ IF LEACHATE MIGRATION IS THE MECHANISM FOR GW CONTAMINATION; 1,4-DICHLOROBENZENE WOULD BE ONE OF FIRST CONSTITUENTS TO ATTENUATE

→ IF GAS MIGRATION IS THE MECHANISM FOR GW CONTAMINATION, 1,4-DICHLOROBENZENE CONCENTRATIONS MIGHT BE ~~BE~~ AT A WIDER DISTRIBUTION AT LOW LEVELS & THEN A SHARP DROP-OFF TO NO DETECTION

- CHLORIDE VALUES USED TO INDICATE WHY LEACHATE IS NOT THE SOURCE OF GW CONT.

→ AMOUNT OF ~~CHLORIDE~~ REDUCTION CONTAINING LEACHATE & MW-10 (100 FOLD)

DOES NOT EXPLAIN BZ & VC CONCENTRATIONS WHEN COMPARING LEACHATE & MW-10

- LEACHATE INDICATORS NOT PRESENT IN WELL MW-10 (SO LEACHATE IS NOT LIKELY THE SOURCE OF GW CONT.)

- % CO₂ IN ^{OLD} GAS PROBES ALONG THE NORTH SIDE OF THE 60-ACRE LF

- DEEPER GAS PROBES INDICATE CO₂ INCREASING w/ DEPTH; CONSIDERED TO BE AN INDICATOR OF LF GAS BEING PRESENT IN VICINITY OF WELL MW-10

CITRUS CENTRAL LF - SAR COMMENTS

- OLDER LF TYPICALLY PRODUCE LITTLE METHANE; MORE CO₂ PRODUCED AS ANAEROBIC CONDITIONS EXIST AFTER LF IS COVERED
- CO₂ IS HEAVIER THAN AIR, SO IT WOULD "SINK" (TRYING TO INDICATE THAT DEEPER GAS PROBES WOULD HAVE RELATIVELY HIGHER CONCENTRATION OF CO₂ THAN SHALLOWER GAS PROBES)
- PLAN TO DO SOME FIELD INVESTIGATION AT GP-1 → GP-4 & MW-10 TO TRY TO DEMONSTRATE IF GAS IS THE SOURCE OF ^{GW} CONTAMINATION; BASED ON LOCATION OF GAS PROBES & CONSTRUCTION, MAY NEED TO INSTALL SOME ADD'L "INTERMEDIATE" GAS PROBES TO HELP SUPPORT THE LF GAS PATHWAY

SAR LETTER
COMMENT #3

MECHANISM TO DEGRADE CONSTITUENTS OF CONCERN

- NEED TO DEMONSTRATE CONDITIONS ARE SUITABLE FOR MICROBIAL DEGRADATION

CIS-1,2-DICHLOROETHENE IS AN INDICATOR OF BIOLOGICAL ACTIVITY

SAR LETTER
COMMENT #2

DECREASE OF CONTAMINATION CONCENTRATIONS

SJP - WON'T BE ABLE TO APPROVE SAR ADDENDUM IF CONCENTRATIONS ARE NOT DECREASING

TB - NOT LONG ENOUGH PERIOD OF RECORD AT MW-10 TO SHOW DECREASING GW CONCENTRATIONS

SMEGITE - IF CONTINUE TO MEET DEADLINES WHAT IS IMPLICATION FOR FACILITY FOR PERMITTING/ENFORCEMENT

SJP - IF MEET DEADLINES FOR RESPONSES, NO IMPACTS TO PERMITTING OR ADD'L ENFORCEMENT

SMEGITE - QUESTION ABOUT "SIGNIFICANT" REDUCTION OF GW IDENTIFIED ON LATEST INSPECTION REPORT

SJP - IT IS A CONTINUING ISSUE, NEEDS TO BE REFLECTED ON INSPECTION FORM

Citrus SAR

9/29/08

JRM memo -

#9-12 slug tests - Oct 2007, Oct 2006 reports

- Figure 5-1
- we acknowledge that there is not enough data to make an isoconcentration map
- need to be consistent if wells were resampled to identify the data
- compliance wells vs. detection wells
 - exceedance in compliance wells is a violation
 - can resample detection well, & can disregard previous data
 - we cannot ignore values in compliance wells
- worst case has to be reported for compliance wells
- should include most recent data (2nd 1/2 2008 sampling) in SAR Addendum

Source of contamination - benzene, vinyl chloride
higher vapor pressure \Rightarrow more in vapor
lower boiling point \Rightarrow more in vapor

solubility in gas -

1,4 dichlorobenzene is indicator of gas

MW-10 water table is @ +180 ft
probes are 40 ft deep

#3 Ability to degrade vinyl chloride & benzene

- don't want methanogenic conditions

- look at cis 1,2, DCE for biological degradation
trans 1,2, DCE is chemical degradation

#2

effect on permitting? AS long AS comply w/ timelines w/ ignore to, then in compliance & no effect

Phase 3 - gump needs to be in Phase III
construction permit

- add new leachate sampling point

- change ZOD to include Phase III

Agenda for the Citrus County Central Class I Landfill Site Assessment Report FDEP
Request for Additional Information meeting.

Meeting date—September 29, 2008 at 10:45 A.M.

Location—Southwest District FDEP office

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 - c. Risk Assessment-Propose Alternate CTL's

SPECIFIC QUESTIONS RESPONSES

1. Ask for input as to preferred content or format of presentation for individual responses.
2. Fewer paper copies if 1 electronic?

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

Chairwoman Joyce Valentino
Citrus County Board of County
Commissioners
110 North Apopka Avenue
Inverness, Florida 34450

2. Article Number

(Transfer from service label)

7008 0150 0003 4893 7070

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

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Paul Age

☐ Agent

☐ Addressee

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Paul Age

C. Date of Delivery

4-8-08

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☒ Yes

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☐ No

3. Service Type

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☐ C.O.D.

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Florida Department of Environmental Protection

Southwest District

c/o John Morris - Solid Waste

13051 North Telecom Parkway

Temple Terrace, FL 33637-0926

Southwest District

SAR COMMENTS

LETTER?

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Florida Department of Environmental Protection

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RE: Site Assessment Report, Dated October 2007
Consent Agreement OGC Case No. 05-1078
Citrus County Central Class I Landfill and the Closed Class I Landfill
Citrus County

Dear Chairwoman Valentino:

The Department has prepared this letter regarding the Site Assessment Report (SAR), prepared by Jones Edmunds & Associates, Inc. (JEA), received on October 22, 2007 and submitted on behalf of the Citrus County Board of County Commissioners (County). The SAR was submitted in accordance with paragraph 11.b. of Consent Agreement OGC Case No. 05-1078, which was executed with the County on September 20, 2005. For some background, the Department's letter dated October 26, 2006, regarding "Clarification of Deadlines and Status of Compliance," notified the County that based on the results reported for the July and August 2006 sampling events, assessment activities for the affected ground water monitoring well MW-10 at the referenced facility should commence by January 29, 2007. In accordance with Chapter 62-780, Florida Administrative Code (F.A.C.), the SAR was due by October 26, 2007. The Department apologizes for the delay in providing these comments.

Unfortunately, the Department does not agree with the conclusions of the above-referenced SAR. This letter serves as notification required by Rule 62-780.600(9)(b)1, F.A.C. that the SAR does not contain information adequate to support the conclusions regarding the applicable site assessment objectives outlined in subsection 62-780.600(3), F.A.C. Additionally, this letter serves as notification required by Rule 62-780.600(9)(b)2, F.A.C. that the recommendation to implement Natural Attenuation with Monitoring, which was submitted pursuant to paragraph 62-780.600(8)(b), F.A.C., is not supported by the applicable criteria, as follows:

- 1) The SAR does not adequately determine or confirm the origin of the source of contamination as per Rule 62-780.600(3)(c), F.A.C. Although the SAR indicates that landfill gas is the source of contamination of groundwater in the vicinity of compliance well MW-10, information was not provided to support this conclusion, such as:
 - a. Data to demonstrate that landfill gas is present in the vicinity of compliance well MW-10;
 - b. If landfill gas is present, a proposed pathway and supporting calculations that demonstrates that the volume of landfill gas is sufficient to cause groundwater quality impacts in the vicinity of MW-10;
 - c. Analytical results that demonstrate that volatile organic compounds in landfill gas are similar to those in groundwater in the affected area.
- 2) The monitoring data reported through the January/March 2008 sampling events do not show an overall decrease in contamination, as required by Rule 62-780.690(1)(e), F.A.C.
- 3) A technical evaluation of groundwater characteristics, chemistry, and biological activity that verifies that the contaminants have the capacity to degrade under the site-specific conditions was not provided, as required by Rule 62-780.690(1)(f)2.a., F.A.C.

The attached Department memorandum provides additional comments on the sections of the SAR that do not address the applicable site assessment objectives outlined in subsection 62-780.600(3), F.A.C.

Other Comments

The Conclusions section of the SAR indicates, "Natural Attenuation Monitoring was implemented at the Landfill, with the two assessments wells (MW-18 and MW-19) being incorporated into the compliance monitoring as required by the Permit Modification #23175-011 issued on April 11, 2007...." Please note that the Department **disagrees** that the above-referenced permit modification in any way approved Natural Attenuation with Monitoring as the County's SAR conclusion/recommendation. Please note that Chapter 62-780, F.A.C. requires the Department to provide written approval of the SAR, which in turn requires the Respondent to prepare a Natural Attenuation with Monitoring Plan that also requires written approval prior to its implementation.

As required by Rule 62-780.600(10), F.A.C., please submit to the Department, within sixty (60) days of receipt of this letter, two copies of a Site Assessment Report Addendum that includes a recommendation to either prepare a Remedial Action Plan as required by Rule 62-780.700, F.A.C. or a recommendation to prepare a risk assessment or a Risk Assessment work plan as required by Rule 62-780.650, F.A.C.

In addition, please provide revisions to the Site Assessment Report, dated October 2007, based on the Department's attached review comments that use a ~~strike-through~~ and underline format, or similar format, to facilitate review. Please include the revision date as part of the header/footer for all revised or replacement pages for the SAR (text, figures, tables and appendices).

Please feel free to contact the Department to discuss this letter. You may contact Stephanie Watson at (813) 632-7600 x 451, or John Morris, P.G. at (813) 632-7600 x 336.

Sincerely,



Susan J. Pelz, P.E.
Solid Waste Program Manager
Southwest District

sw/jrm/sjp
Attachment:
cc w/ att:

cc w/o att:

Memorandum by John Morris, P.G., dated August 22, 2008
Susan Metcalfe, P.G., Solid Waste Management Division Director, Citrus County
Karen Bishop, FDEP OGC
Anthony J. Schembri, County Administrator, Citrus County
Glenn McCracken, Director, Public Works, Citrus County
William Kutash, P.G., Waste Program Administrator, FDEP SWD
Steve Morgan, FDEP SWD
John Morris, P.G., FDEP SWD

Memorandum

Florida Department of Environmental Protection

TO: William Kutash, P.G., Waste Management Program Administrator
THROUGH: Susan Pelz, P.E., Solid Waste Section Manager
FROM: John Morris, P.G., Solid Waste Section *JRM 8/22/08*
Stephanie Watson, Solid Waste Section *SW 8/22/08*
DATE: August 22, 2008
SUBJECT: Citrus County Central Class I Landfill
¶11.b. of Consent Agreement OGC Case #05-1078
Site Assessment Report Dated October 2007

This memorandum has been prepared to provide the Department's review comments regarding the document entitled "Citrus County Central Landfill Site Assessment Report" (SAR), prepared by Jones Edmunds & Associates, Inc. (JEA), dated October 2007, received October 22, 2007. The SAR was submitted on behalf of Citrus County to comply with Chapter 62-780, F.A.C., as required by ¶11.b., of Consent Agreement OGC Case #05-1078. The Department's letter dated October 26, 2006, re: "Clarification of Deadlines and Status of Compliance," notified the County that assessment activities at affected ground water monitor well MW-10 needed to commence by January 29, 2007 and that the resultant SAR was due to be submitted to the Department by October 26, 2007.

The following sections of the SAR do not address the requirements of Rule 62-780.600(8), F.A.C., as listed below:

Section 2.1.1 – Present Real Property and Facility Owners [Rule 62-780.600(8)(a)1.a., F.A.C.]

1. The ownership of the 60-acre landfill does not appear to be described.

Section 2.4 – Site Map That Shows Pertinent Features [Rule 62-780.600(8)(a)4., F.A.C.]

2. The occurrence (or absence) of surface or subsurface features including utilities, sewers, floor drains, rain lines, and storage areas in the immediate vicinity of the contamination near well MW-10 does not appear to be described.

Section 2.5 – Contaminant Discharge Location Map [Rule 62-780.600(8)(a)5., F.A.C.]

3. Figure 5-1 was indicated to present the contaminant concentrations for ground water samples collected in January and February 2007, however Figure 5-1 does not present the following:
 - a. Results for the samples collected from well MW-10 during both January 2007 and February 2007;
 - b. Results for the samples collected from well MW-13 during January 2007;
 - c. Results for the samples collected from well MW-15 during January 2007 reported benzene at a concentration of 0.49 µg/L and vinyl chloride at a concentration of 0.91 µg/L; and,
 - d. Results for the samples collected from well MW-B during January 2007 reported benzene at a concentration of 0.69 µg/L.

4. The date of the resampling event conducted at well MW-13 (referenced in Figure 5-1) was not indicated and the laboratory report of results for this resampling event were not provided.

Section 2.6 – Details of Preliminary Site Assessment Activities [Rule 62-780.600(8)(a)6., F.A.C.]

5. Results for the samples collected from well MW-15 during January 2007 reported vinyl chloride at a concentration of 0.91 µg/L (see Recommendation bullet item #1).

6. The reference to Section 1.d., in the first sentence of ¶3 appears to be incorrect and should be replaced by a reference to Section 2.1.4 of the SAR.

Section 2.7 – Well Survey Data [Rule 62-780.600(8)(a)7., F.A.C.]

7. The first sentence of this section referred to the survey for wells MW-18, MW-19, PZ-1 and PZ-2 provided in Attachment B of the SAR. The second sentence of this section indicated that a site survey for the landfill was presented in the “RAI” document (submittal entitled “Citrus County Central Landfill, Ground Water Investigation Report, Response to FDEP Request for Additional Information,” prepared by JEA, dated September 2006), however a survey was not provided in the “RAI” document for wells MW-10 through MW-17.

Section 2.8 – Well Construction Details with Water-Level Elevations [Rule 62-780.600(8)(a)8., F.A.C.]

8. The indication in the first sentence of ¶6 that well MW-16 reported lower ground water elevations as it is screened in limestone is inconsistent with the Boring Log Field Report and Monitor Well Completion Report provided in Appendix D and Appendix E of the “RAI” document, respectively, which indicate this well is screened in silty clay and clayey sand sediments.

Section 2.12 – Slug Test Results [Rule 62-780.600(8)(a)12., F.A.C.]

9. ¶1 of this section referred to the slug tests conducted at MW-18, MW-19, PZ-1 and PZ-2 as summarized in Table 12-1, with slug test data and graphs of residual head vs. time plots provided in Attachment D of the SAR. ¶2 of this section referred to the slug tests conducted at wells MW-10 through MW-17 as summarized in Table 4, with slug test data and graphs of residual head vs. time plots provided in Appendix E of the “RAI” document. While both Section 2.12 of the SAR and Section 2.5 of the “RAI” document indicated that the slug test data were evaluated using the Hvorslev method (as referenced in Fetter, 1994), the “RAI” document indicated that “slug in” data were not used as the well screens were partially submerged. Based on the construction details provided for MW-18, PZ-1 and PZ-2 in Attachment C of the SAR, and the ground water elevations reported in Table 8-2 of the SAR, the well screens were partially submerged at these three locations, however the “slug in” data for these locations were provided in Table 8-2 and the data were used to calculate the average hydraulic conductivity value in the assessment area of the facility.

10. The value of L_e presented in Table 12-1 of the SAR (22 ft) appears to be inconsistent with the construction details provided for MW-18, MW-19, PZ-1 and PZ-2 in Table 8-1 (10-foot screen length at MW-19; 20-foot screen lengths at MW-18, PZ-1 and PZ-2). The screen intervals at MW-18, PZ-1 and PZ-2 were partially submerged at the time the slug tests were conducted, as follow: MW-18 had 9.08 feet of submerged screen; PZ-1 had 13.15 feet of submerged screen; PZ-2 had 5.41 feet of

submerged screen. The entire 10-foot screen length at MW-19 was submerged at the time the slug tests were conducted.

11. Table 12-1 included a note that the “PZ-2 slug out data did not yield a good correlation,” however Section 2.12 of the SAR did not describe the deficiency of this slug test or provide the results of a follow-up “slug out” test at PZ-2.

12. Table 12-1 included a note that “MW-18s time at 37% was calculated using trendlines as the data was good although the tests were not allowed to run to completion,” however the trend lines for the “slug-in” and “slug-out” tests conducted at MW-18 were not provided in Appendix C of the SAR.

Section 2.13 – Horizontal Ground Water Flow Velocity Calculation [Rule 62-780.600(8)(a)13., F.A.C.]

13. ¶1 of this section referred to the horizontal average linear ground water velocity calculations provided in Table 13-1 of the SAR. The distances between wells presented in Table 13-1 are inconsistent with the distances between wells shown on the survey presented in Attachment B.

14. The hydraulic conductivity values presented in Table 13-1 for MW-18, PZ-1 and PZ-2 may need to be revised to be consistent with the responses provided to comment #9 through #12, above.

Section 2.14 – Vertical Ground Water Flow Velocity Calculation [Rule 62-780.600(8)(a)14., F.A.C.]

15. The hydraulic conductivity value presented in Table 14-1 for MW-19 may need to be revised to be consistent with the responses provided to comment #9 through #12, above.

Section 2.16 – Site-Specific Stratigraphy [Rule 62-780.600(8)(a)16., F.A.C.]

16. ¶3 of this section provided a reference to the “RAI” document regarding the elevation range reported for the sediments that represented the top of the Suwannee Formation, however it does not appear that this information was presented in the “RAI” document. It appears the information that described site-specific geology was presented in Section 2.0 of the document entitled “Ground Water Monitoring Plan Evaluation,” prepared by JEA, revised June 2005 (submitted as Attachment M-1 of the Engineering Report in support of permit application #21375-008-SO).

17. ¶3 of this section does not specify that the provided description of site-specific stratigraphy (including composition, thickness, and continuity of various lithologic units) was based on monitoring well installation and on standard penetration test borings.

Section 2.17 – Geologic Cross-Sections [Rule 62-780.600(8)(a)17., F.A.C.]

18. This section referenced Figures 17-1 and 17-2 do not illustrate the approximate concentrations of applicable contaminants. However, the discussion presented in Section 4.1 of the SAR appears to adequately explain why contaminant isoconcentration contours were not provided. Accordingly, for ground water contamination in a single aquifer, the information presented in Figure 5-1 is considered to be sufficient to address the requirements of the cited rule.

19. Figures 17-1 and 17-2 appear to depict the contact between the sand/clayey sand sediments and the limestone sediments based on the first occurrence of limestone. These figures do not depict

the stratigraphy encountered at MW-11, MW-12, MW-13 and PZ-2 where clayey sand, sandy clay, silty clay, or clay were reported below the uppermost limestone.

Section 2.22 – Treatment or Disposal Methods of Investigation-Derived Waste

[Rule 62-780.600(8)(a)22., F.A.C.]

20. The first sentence of this section indicated that drill cuttings from MW-18, MW-19, PZ-1 and PZ-2 were placed in drums until the laboratory reports for the samples were received, however the analyses were not provided to confirm that spreading the drill cuttings on the ground in the vicinity of the wells/piezometers represented proper disposal.

21. The third sentence of this section indicated that no fluids were generated during the drilling of PZ-1 and PZ-2, but does not indicate how fluids generated during the drilling of MW-18 and MW-19 were handled, characterized or disposed.

22. The fourth sentence of this section indicated that purge water from developing MW-18 and MW-19 was placed in drums and later poured on the ground near the respective monitoring wells, however the basis for determining that this represented proper disposal was not provided.

23. The fourth sentence of this section did not address the handling, characterization or disposal of purge water from developing PZ-1 and PZ-2 although the Monitor Well Completion Reports presented in Attachment C of the SAR indicated both locations were initially air sparged and additionally developed before installing the pressure transducers.

Section 2.23 – Updated Well Construction Details Summary Table [Rule 62-780.600(8)(a)23., F.A.C.]

24. This section referenced the construction details provided in Table 8-1, however this table did not fully reference the datum used for the monitor well and piezometer top-of-casing elevation and ground surface elevation (i.e., NGVD “of 1929”).

Section 3.0 – Quality Assurance Requirements [Rule 62-780.600(8)(a), 26., F.A.C.]

25. The references to the laboratory reports, chain-of-custody forms, and sampling logs in Attachment D in sub-sections 3.1, 3.2 and 3.3 appear to be incorrect and should be replaced by references to Attachment E of the SAR.

Section 4.0 – Ground Water Analytical Results [Rule 62-780.600(8)(a)27., F.A.C.]

26. This section does not provide a reference to a summary table of ground water “contaminants detected, their corresponding CTLs and the basis or reason for any alternative CTLs, detection limits achieved for non-detected analytes, and analyses performed, and that summarize all available analytical results.”

27. The reference to the laboratory results in Attachment D appears to be incorrect and should be replaced by a reference to Attachment E of the SAR.

28. The fourth sentence of ¶1 of this section indicated that for the January 2007 and February 2007 sampling events “MW-6, MW-8R, MW-AA and MW-10 reported concentrations above the

standards for Vinyl Chloride and Benzene,” however the samples collected from MW-6 and MW-AA were not reported to exceed the ground water standard for benzene.

29. The fifth sentence of ¶1 of this section indicated that for the January 2007 and February 2007 sampling events vinyl chloride was reported in MW-10 at 1.2 µg/L, however samples from MW-10 were collected for both events with the highest concentration reported at 2.5 µg/L for the sample collected during January 2007.

30. The sixth sentence of ¶1 of this section indicated that for the January 2007 and February 2007 sampling events benzene was reported in MW-10 at 1.1 µg/L, however samples from MW-10 were collected for both events with the highest concentration reported at 1.4 µg/L for the sample collected during January 2007.

Section 4.1 – Well Location Map With Isoconcentration Contours [Rule 62-780.600(8)(a)28., F.A.C.]

31. The first sentence of this section indicated that for the January 2007 and February 2007 sampling events benzene was reported in MW-10 at 1.1 µg/L, however samples from MW-10 were collected for both events with the highest concentration reported at 1.4 µg/L for the sample collected during January 2007.

32. The second sentence of this section indicated that for the January 2007 and February 2007 sampling events vinyl chloride was reported in MW-10 at 1.2 µg/L, however samples from MW-10 were collected for both events with the highest concentration reported at 2.5 µg/L for the sample collected during January 2007.

Section 5.0 – 62-780.600(8)(B) Conclusions [Rule 62-780.600(8)(b), F.A.C.]

33. Comments regarding the summary of conclusions for the site assessment objectives and recommendations for additional actions are provided by the Department under separate cover.

Watson, Stephanie M.

From: Watson, Stephanie M.
Sent: Tuesday, May 13, 2008 1:11 PM
To: 'Susan Metcalfe'; Pelz, Susan
Cc: Michael Arnold; Morris, John R.; Gaskin, Nancy; Morgan, Steve; Tammie Gardner
Subject: RE: SAR review
Attachments: Status.2-5-080001.pdf

Susie,

The status of the Department's review of the SAR, submitted in October 2007, has not changed since the issuance of the Department's February 5, 2008 letter (please see attached).

Please let me know if you have any other questions.

Stephanie

Stephanie Watson
Florida Department of Environmental Protection, Southwest District, Solid Waste Section
Telephone: 813-632-7600, ext. 451; Fax: 813-632-7664; E-mail:
stephanie.m.watson@dep.state.fl.us

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Tuesday, May 13, 2008 11:46 AM
To: Pelz, Susan
Cc: Michael Arnold; Morris, John R.; Gaskin, Nancy; Watson, Stephanie M.; Morgan, Steve; Tammie Gardner
Subject: SAR review

Susan,
Just checking again on the status of review of the groundwater site assessment report for our facility that was submitted in October 2007.
Susie

Tracking:

Recipient

'Susan Metcalfe'

Pelz, Susan

Michael Arnold

Morris, John R.

Gaskin, Nancy

Morgan, Steve

Tammie Gardner

Read

Read: 5/13/2008 1:13 PM

Read: 5/13/2008 4:54 PM

Memorandum

Florida Department of
Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

To: WML ☒ Deborah A. Getzoff, District Director

FROM/THROUGH: WML ☒ William Kutash, Waste Program Administrator

SP 2/4/08 ☒ Susan Pelz, P.E., Program Supervisor

SW 1/30/08 ☒ Stephanie Watson, Enforcement Coordinator

DATE: January 30, 2008

FILE NAME: CITRUS COUNTY BOARD OF COUNTY OGC FILE NO. **05-1078**
COMMISSIONERS/CITRUS COUNTY
CENTRAL-CLASS I LANDFILL

PROGRAM: **SOLID WASTE/WASTE MANAGEMENT** COUNTY: **CITRUS**

TYPE OF DOCUMENT:

☐ DRAFT OR ☐ FINAL ☐ NOV ☐ CONSENT ORDER
☐ FINAL ORDER ☒ STATUS OF COMPLIANCE LETTER
☐ WARNING LETTER ☐ INSPECTION REPORT

Action Required: Status of Compliance letter for your review.

Note: The Consent Agreement was executed in September 2005. This letter provides the Department's understanding of the County's compliance with the Consent Agreement.

Description of Violations: Exceedances of ground water standards and exceedances of the landfill gas criteria at or beyond the landfill property boundary.

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Chairwoman Joyce Valentino
 Citrus County Board of County
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Florida Department of Environmental Protection
Southwest District

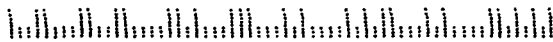
c/o Stephanie Watson - Solid Waste

13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Dept. Of Environmental Protection

FEB 10 2008

Southwest District





Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

290992 Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 5, 2008

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Chairwoman Joyce Valentino
Citrus County Board of County Commissioners
110 North Apopka Avenue
Inverness, Fl. 34450

RE: Status of Compliance
Consent Agreement OGC Case #05-1078
Citrus County Central Class I Landfill and the Closed Class I Landfill
Citrus County

Dear Chairwoman Valentino:

This letter has been prepared as a follow-up to the Department's October 26, 2006 "Status of Compliance" letter and provides the Department's summary of the Citrus County Board of County Commissioner's (the County's) compliance with the Consent Agreement No. 05-1078, which was executed on September 20, 2005, as summarized below.

Paragraph 6 states "The approved 'Groundwater Investigation Plan' shall be incorporated herein and made a part of this Consent Agreement, as Exhibit A, and the Respondent shall implement the proposals in the Groundwater Investigation Plan pursuant to the approved schedule."

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because site assessment activities in accordance with Rule 62-780.600, F.A.C. have not been concluded. The Department received the Site Assessment Report (SAR), prepared by Jones Edmunds & Associates, Inc. (JEA), on October 22, 2007. However, the Department has not yet completed its review of the SAR and provided comments to the County.
- Please see paragraph 11.a. for further details regarding the permit modification to the operation permit.
- Please see paragraph 11.b. for further details regarding site assessment activities in accordance with Rule 62-780, F.A.C.

Paragraph 7 states "The approved 'Landfill Gas Compliance Action Plan' shall be incorporated herein and made a part of this Consent Agreement, as Exhibit B, and the Respondent shall implement the proposals in the Landfill Gas Compliance Action Plan pursuant to the approved schedule."

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Agreement requirement. No further action is required.

Paragraph 8 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall install and develop ground water monitoring wells MW-10 through MW-15 and MW-17 within 100 feet of the edge of waste disposal cells, conduct an "initial sampling event" at these wells, and submit a summary report of the initial sampling event results to the Department with recommendations regarding the need to conduct further assessment activities, as summarized in Exhibit A."

Information Received:

- Document entitled "Citrus County Central Landfill, Ground Water Investigation Report" (GWIR), prepared by JEA, dated January 2006, received January 4, 2006;
- Letter regarding "Supplemental Information and Resampling Data for MW-15, Citrus County Central Landfill Ground Water Investigation," prepared by JEA, dated February 3, 2006, received February 6, 2006;
- Letter regarding "Additional Ground Water Investigation Results, Citrus County Central Landfill," prepared by JEA, dated February 15, 2006, received February 16, 2006; and,
- Letter regarding "Ground Water Sampling Status, Citrus County Central Class I Landfill," prepared by JEA, dated April 21, 2006, received April 24, 2006.

Department Action:

- In its May 24, 2006 letter, the Department requested revisions to the GWIR by September 15, 2006.

Information Received:

- Document entitled "Citrus County Central Landfill Groundwater Investigation Report – Response to FDEP Request for Additional Information," prepared by JEA, dated September 2006, received September 15, 2006;

Department Action:

- The Department reviewed the September 15, 2006 JEA submittal and provided its comments in the September 28, 2006 Memorandum by John Morris entitled "Review Comments Regarding 'Ground Water Investigation Report,' which was transmitted by the Department's October 26, 2006 "Status of Compliance" letter to the County. In the October 26, 2006 letter, the Department requested a response to review comment #1 of the September 28, 2006 memorandum within 30 days of receipt of the letter.

Information Received:

- Letter regarding "Proposed Site Assessment Activities, Citrus County Central Class I Landfill," prepared by JEA, dated November 9, 2006, received November 13, 2006, provided proposed assessment well locations and construction details.

Department Action:

- The Department reviewed the November 9, 2006 JEA letter and discussed review comments during a telephone conversation with County staff and the County's consultants on December 15, 2006. The Department provided review comments to the County in an e-mail message dated November 20, 2006 regarding the use of alternate analytical methods for selected "initial sampling event" parameters for the new wells installed in the lease expansion area.

Information Received:

- Letter regarding "Proposed Site Assessment Activities, Citrus County Central Class I Landfill," prepared by JEA, dated December 28, 2006, received January 2, 2007, provided revised locations and construction details for proposed assessment wells and piezometers.
- Letter regarding "Semiannual Groundwater Monitoring – Second Semiannual 2006, Citrus County Landfill," prepared by JEA, dated and received January 10, 2007, provided the results of supplemental analyses for six (6) initial sampling event parameters for the July 2006 sampling event.
- Letter regarding "First Semiannual 2007 Semiannual Groundwater Monitoring Report, Citrus County Landfill," prepared by JEA, dated May 30, 2007, received June 1, 2007, provided the

results of supplemental analyses for eight (8) initial sampling event parameters for the January 2007 sampling event.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Agreement requirement. No further action is required.

Paragraph 9 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall install new landfill gas monitoring probes GP-1 through GP-18, submit a to-scale construction drawing of the new gas monitoring probes, and submit gas monitoring data results to the Department, as summarized in Exhibit B. Existing gas monitoring probes shall not be abandoned until the lease expansion agreement referenced in Paragraph 10 is submitted to the Department and the permit modification referenced in Paragraph 11.a. is issued."

Information Received:

- Document entitled "Landfill Gas Monitoring Probes Installation Construction Certification Report, Citrus County Central Landfill," prepared by SCS Engineers (SCS), dated January 3, 2006, received January 3, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 1st Quarter 2006, prepared by SCS, dated March 17, 2006, received March 22, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 2nd Quarter 2006, prepared by SCS, dated July 3, 2006, received July 7, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 3rd Quarter 2006, prepared by SCS, dated September 26, 2006, received September 29, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 4th Quarter 2006, prepared by SCS, dated October 24, 2006, received October 30, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 1st Quarter 2007, prepared by SCS, dated April 13, 2007, received April 16, 2007;
- Document entitled "Landfill Gas Monitoring Results," for 2nd Quarter 2007, prepared by SCS, dated July 6, 2007, received July 9, 2007;
- Document entitled "Landfill Gas Monitoring Results," for 3rd Quarter 2007, prepared by SCS, dated August 29, 2007, received August 30, 2007;
- Document entitled "Landfill Gas Monitoring Results," for 4th Quarter 2007, prepared by SCS, dated December 11, 2007, received December 13, 2007;
- The application for operating permit modification referenced in paragraph 11.a. was submitted on January 5, 2007, and minor permit modification No. 21375-011 to existing permit No. 21375-008-SO was issued on April 24, 2007.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Agreement requirement. No further action is required.

Paragraph 10 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall obtain a lease expansion agreement from the Division of Forestry/State Lands and submit a copy of this lease agreement to the Department. If the lease expansion agreement is not obtained within 90 days of the effective date of the Consent Agreement, the Department reserves the right to grant an extension of 30 days to Respondent to obtain such lease expansion agreement if an extension is warranted. If the Department grants a 30-day extension, then such 30-day extension shall automatically apply to Ordered Sections Paragraphs 11.a., 11.b., 11.c., 12.a. and 12.b."

Department Action:

- The Department granted, in its April 4, 2006 letter to the County, an extension until September 1, 2006 to comply with this paragraph.

Information Received:

- Document entitled "Amendment Number One to Sublease Number 3316-05," which was executed on August 30, 2006 between Citrus County and the Florida Department of Agriculture and Consumer Services, received on September 22, 2006.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Agreement requirement. No further action is required.

Paragraph 11.a. states "Within 120 days of the effective date of the Consent Agreement, Respondent shall submit an application for a permit modification to the Department that addresses changes in the facility's boundaries, zone of discharge (ZOD), monitoring well network, routine ground water sampling frequency, and landfill gas monitoring system."

Department Action:

- The Department granted, in its April 4, 2006 letter to the County, an extension until September 1, 2006 to comply with this paragraph.

Compliance Deadline:

- The County was required to submit an application for the permit modification referenced above within 120 days of September 1, 2006, or by December 30, 2006.

Information Received:

- The application for operating permit modification referenced in paragraph 11.a. was submitted on January 5, 2007, and minor permit modification No. 21375-011 to existing permit No. 21375-008-SO was issued on April 24, 2007.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Agreement requirement. No further action is required.

Paragraph 11.b. states "If exceedances of ground water standards (primary drinking water standards listed in Rule 62-550.310, F.A.C.) or minimum criteria as specified in Chapter 62-520, F.A.C., are reported in the initial sampling event results referenced in Paragraph 8, then within 150 days of the effective date of the Consent Agreement, the Respondent shall commence site assessment activities at the affected new wells (MW-10 through MW-15 and MW-17) at the new ZOD in accordance with Chapter 62-780, F.A.C. The Respondent shall conduct site assessment activities and submit a Site Assessment Report in accordance with the requirements of Rule 62-780.600, F.A.C., as summarized in Exhibit A."

Information Received:

- Document entitled "Citrus County Central Landfill Groundwater Investigation Report – Response to FDEP Request for Additional Information," prepared by JEA, dated September 2006, received September 15, 2006;

Department Action:

- The above document indicates that monitoring well MW-10 demonstrated exceedances of the ground water standard of 1 ug/L for vinyl chloride. The July 2006 sampling result was 5 ug/L and the August 2006 resampling result was 2 ug/L. The Department October 26, 2006 letter notified the County that site assessment activities at the affected well MW-10 were needed and that a Site Assessment Report was required to be submitted to the Department within 270 days of September 1, 2006, or by October 26, 2007.

Information Received:

- The Department received the Site Assessment Report (SAR), prepared by Jones Edmunds & Associates, Inc., on October 22, 2007.

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because site assessment activities in accordance with Rule 62-780.600, F.A.C. have not been concluded. The Department has not yet completed its review of the SAR and provided comments to the County.
- Please note that if exceedances of ground water standards or minimum criteria are reported in future routine sampling event results for compliance wells MW-11 through MW-15 and MW-17, then the additional affected wells shall be included in site assessment activities.

Paragraph 11.c., 11.d., and 11.e. states "If exceedances of Rule 62-701.530(1)(a), F.A.C., are reported in the gas monitoring data results referenced in Paragraph 9, then within 150 days of the effective date of the Consent Agreement, the Respondent shall complete installation of passive gas vents, as described in "Phase 2" of the approved Landfill Gas ("LFG") Compliance Action Plan, at the new property boundary,..."

Information Received:

- Document entitled "Landfill Gas Monitoring Results," for 1st Quarter 2006, prepared by SCS, dated March 17, 2006, received March 22, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 2nd Quarter 2006, prepared by SCS, dated July 3, 2006, received July 7, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 3rd Quarter 2006, prepared by SCS, dated September 26, 2006, received September 29, 2006;

Department Action:

- A Department review of the above-mentioned reports indicates that there were no exceedances of Rule 62-701.530(1)(a), F.A.C reported for gas monitoring probes GP-1 through GP-18.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order requirement. No further action is required.

Paragraph 12 states "If the lease expansion agreement referenced in Paragraph 10 is not obtained and submitted to the Department within 90 days of the effective date of this Consent Agreement, or in accordance with an extension granted by the Department..."

Compliance Status:

- This paragraph is not applicable because the lease expansion agreement was obtained. The facility is considered to be **in compliance** with this Consent Order requirement. No further action is required.

Paragraph 13 states "Upon review of the submittals required by this Consent Agreement, the Department may request additional information. All additional information shall be submitted to the Department within 30 days of receipt of the Department's written request."

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order requirement because the Department has not requested, and is not waiting on information from the County at this time.

Paragraph 14 requires the payment of \$3,000 in costs and expenses incurred by the Department during investigation of this matter, within 30 days of the effective date of the Consent Agreement.

Information Received:

- This payment was due to the Department on October 20, 2005. The Department received a check for \$3,000 from the County on August 15, 2005.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order paragraph. No further action is required.

Paragraph 15 states "Respondent agrees to pay the Department stipulated penalties in the amount of \$100 per day for each and every day Respondent fails to timely comply with any of the requirements of paragraphs 6-14 of this Consent Agreement..."

Department Action:

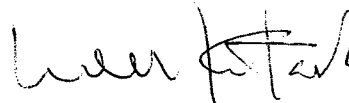
- No stipulated penalties have been assessed to date.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order paragraph at this time.

If you have any questions, please feel free to contact me at (813) 632-7600 x 339, Susan Pelz, P.E., Solid Waste Program Manager, at (813) 632-7600 x 386, or Stephanie Watson at (813) 632-7600 x 451.

Sincerely yours,



Deborah A. Getzoff
District Director
Southwest District

dag/sw
cc:

William Kutash, P.G., Waste Program Administrator, FDEP SWD
Susan Pelz, P.E., FDEP SWD
Steve Morgan, FDEP SWD
John Morris, P.G., FDEP SWD
Lisa London, FDEP OGC
Glenn McCracken, Director, Citrus County Public Works
June Fisher, County Administrator
Susan Metcalfe, P.G., Citrus County Solid Waste Management Division Director

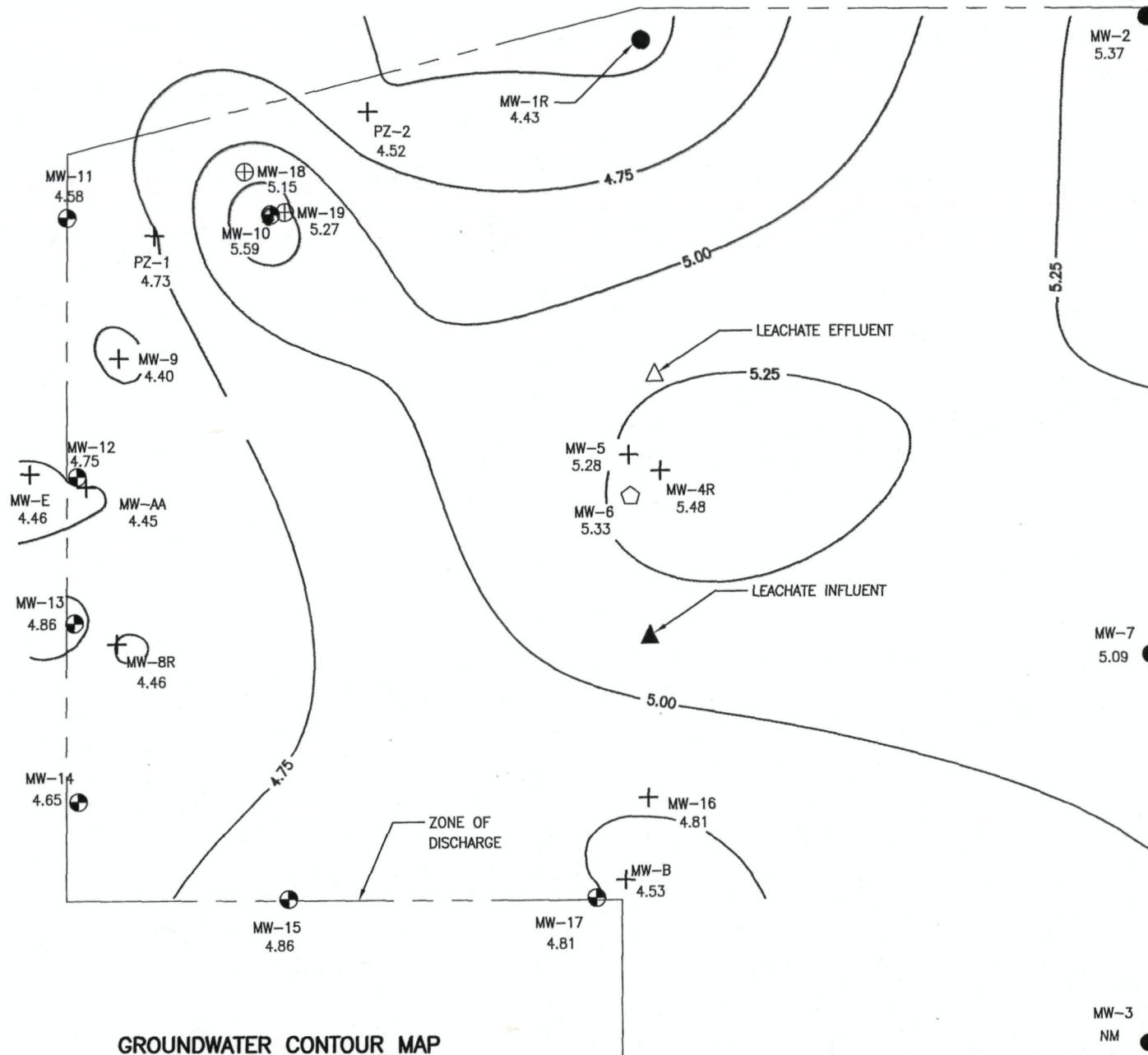
**Table A - Summary of Selected Analytical Results of Ground Water Samples Collected
at Citrus Central Landfill, Citrus County**

THE LATEST MON. DATA
SUMMARY TABLE FOR
NEW COMPLIANCE WELLS

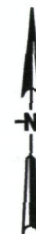
Parameter/ Sampling Event	Ground Water Standard	Monitor Well Identification Number												
		MW-1R B/F	MW-2 B/F	MW-3 B/F	MW-7 C/F	MW-10 C/F	MW-11 C/F	MW-12 C/F	MW-13 C/F	MW-14 C/F	MW-15 C/F	MW-17 C/F	MW-18 A/F	MW-19 A/F
pH (S.U.)														
Nov-05	6.5					5.01	7.03	6.8	5.33	6.82	4.93	5.22		
Jan-06	6.5										5.22			
Jan-06	6.5										4.93			
Jul-06	6.5	5.51	4.88	5.07	5.46	4.65	7.1	6.67	5.31	6.79	4.78	4.96		
Aug-06	6.5					4.7								
Jan-07	6.5	5.02	3.99	4.11	4.99	4.1	7.04	6.56	5.11	6.71	4.44	4.54		
Feb-07	6.5					4								
Jul-07	6.5	5.39	4.87	4.92	5.43	4.65	7.11	6.65	5.2	6.84	4.71	4.96	5.87	6.41
	6.5													
	MAXIMUM	5.51	4.88	5.07	5.46	5.01	7.11	6.8	5.33	6.84	5.22	5.22	5.87	6.41
	MINIMUM	5.02	3.99	4.11	4.99	4	7.03	6.56	5.11	6.71	4.44	4.54	5.87	6.41
Iron (mg/L)														
Nov-05	0.3					0.17	0.054	5.6	0.14	0.19	0.64	0.84		
Jan-06	0.3													
Jan-06	0.3													
Jul-06	0.3	0.027	0.027	0.027	0.027	1.39	0.027	6.71	0.583	0.137	1.35	6.08		
Aug-06	0.3					1.02								
Jan-07	0.3	0.0467	0.0346	0.0038	0.0162	1.61	0.0212	6.49	1.35	0.148	1.99	5.86		
Feb-07	0.3													
Jul-07	0.3	0.0038	0.027	0.00847	0.0038	4.49	0.0225	6.1	2.02	0.113	3.29	7.57		
	0.3													
	MAXIMUM	0.0467	0.0346	0.027	0.027	4.49	0.054	6.71	2.02	0.19	3.29	7.57	0	0
	MINIMUM	0.0038	0.027	0.0038	0.0038	0.17	0.0212	5.6	0.14	0.113	0.64	0.84	0	0
Benzene (µg/L)														
Nov-05	1					0.2	0.05	0.05	0.05	0.05	0.5	0.6		
Jan-06	1													
Jan-06	1													
Jul-06	1	0.05	0.05	0.05	0.05	2	0.05	0.05	0.05	0.05	0.6	0.05		
Aug-06	1					1								
Jan-07	1	0.24	0.24	0.24	0.24	1.4	0.24	0.24	0.24	0.24	0.49	0.24		
Feb-07	1					1.1								
Jul-07	1	0.16	0.16	0.16	0.16	2.5	0.16	0.45	0.93	0.24	0.24	0.99	0.83	0.35
	1													
	MAXIMUM	0.24	0.24	0.24	0.24	2.5	0.24	0.45	0.93	0.24	0.6	0.99	0.83	0.35
	MINIMUM	0.05	0.05	0.05	0.05	0.2	0.05	0.05	0.05	0.05	0.24	0.05	0.83	0.35

**Table A - Summary of Selected Analytical Results of Ground Water Samples Collected
at Citrus Central Landfill, Citrus County**

Parameter/ Sampling Event	Ground Water Standard	Monitor Well Identification Number												
		MW-1R B/F	MW-2 B/F	MW-3 B/F	MW-7 C/F	MW-10 C/F	MW-11 C/F	MW-12 C/F	MW-13 C/F	MW-14 C/F	MW-15 C/F	MW-17 C/F	MW-18 A/F	MW-19 A/F
Methylene chloride (µg/L)														
Nov-05	5					1	0.5	0.5	0.5	0.5	0.5	0.5		
Jan-06	5													
Jan-06	5													
Jul-06	5	0.5	0.5	0.5	0.5	6	0.5	0.5	0.5	0.5	0.5	5		
Aug-06	5					5								
Jan-07	5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5		
Feb-07	5					0.5								
Jul-07	5	0.095	0.095	0.095	0.095	4.5	0.095	0.095	0.095	0.5	0.5	0.095		
	5													
	MAXIMUM	0.5	0.5	0.5	0.5	6	0.5	0.5	0.5	0.5	0.5	5	0	0
	MINIMUM	0.095	0.095	0.095	0.095	0.5	0.095	0.095	0.095	0.5	0.5	0.095	0	0
Vinyl chloride (µg/L)														
Nov-05	1					0.25	0.25	0.25	0.8	0.25	2	0.25		
Jan-06	1										0.25			
Jan-06	1										1			
Jul-06	1	0.25	0.25	0.25	0.25	5	0.25	0.25	0.25	0.25	1	0.25		
Aug-06	1					2								
Jan-07	1	0.26	0.26	0.26	0.26	2.5	0.26	0.26	1.1	0.26	0.91	0.26		
Feb-07	1					1.2								
Jul-07	1	0.46	0.46	0.46	0.46	2.3	0.46	0.46	0.46	0.26	0.64	0.46	0.46	0.46
	1													
	MAXIMUM	0.46	0.46	0.46	0.46	5	0.46	0.46	1.1	0.26	2	0.46	0.46	0.46
	MINIMUM	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.46	0.46



GROUNDWATER CONTOUR MAP
CITRUS COUNTY LANDFILL
JULY 16, 2007



GRAPHIC SCALE
0 100 200 400
SCALE IN FEET

LEGEND

- BACKGROUND (UPGRADIENT) WELLS
- ⊕ DETECTION (DOWNGRAIDENT) WELLS
- ⊕ EXISTING COMPLIANCE WELL
- ▲ LEACHATE INFLUENT SAMPLING LOCATION
- △ LEACHATE EFFLUENT SAMPLING LOCATION
- ⊕ WATER LEVEL ONLY WELLS
- 5.00- GROUNDWATER CONTOUR AT 0.50 FOOT INTERVAL
- ← GROUNDWATER FLOW DIRECTION

NOTE: NM = NOT MEASURED.
* INDICATES WELL NOT USED IN CONTOURING.

Analytical Results Summary for Ground Water Samples Collected at Class I/III Landfills

Facility Name -- Citrus Central Landfill

Analytical Laboratory -- ENCO Lab

Filtered Metals -- N

Equipment Blank -- Y

Duplicate --N

County -- Citrus

Date Sampled -- 11/16 & 11/17/05

GW Contour Map -- Y

Sampling Frequency -- semi-annually

Date Received -- 2/6/06

Exceedances summarized -- Y

PARAMETERS	Ground Water Standard	Monitor Well Identification Number								Notes (as needed)
		MW-10 A/F	MW-11 A/F	MW-12 AF	MW-13 AF	MW-14 AF	MW-15 AF	MW-17 AF		
Field Measurements										
Water Level Elevation	NE	7.84	6.37	6.35	6.65	6.37	6.98	6.55		W/L from contour map (12/21/05)
pH (Std. Units)	6.5 - 8.5	5.01	7.03	6.8	5.53	6.82	4.93	5.22		
Turbidity (NTU)	20*	4.07	0.54	2.18	2.7	2.14	3.04	2.48		GW ELEVATIONS @ 12/21/05
Conductivity (µmhos/cm)	NE	54	388	564	137	499	64	106		MW-1R -- 6.73
Dissolved Oxygen (mg/L)	<20% sat*	1.01	0.4	0.38	0.38	0.36	0.35	0.61		MW-2 -- 8.85
Temperature (°C)	NE	27.98	25.73	26.2	26.74	25.35	26.52	26.55		MW-3 -- 8.46
Metals/Semimetals										MW-4R -- 8.48
Antimony (mg/L)	0.006	<0.001	<0.001	0.0014	<0.001	<0.001	<0.001	<0.001		MW-5 -- 8.50
Arsenic (mg/L)	0.01	0.005	0.0046	0.0025	0.0089	0.005	0.0066	0.0044		MW-6 -- 8.51
Cadmium (mg/L)	0.005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005		MW-7 -- 8.46
Chromium (mg/L)	0.1	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002		MW-8R -- 6.58
Iron (mg/L)	0.3	0.17	0.054	5.6	0.14	0.19	0.64	0.84		MW-9 -- 6.41
Lead (mg/L)	0.015	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	0.0021		MW-16 -- 6.67
Mercury (mg/L)	0.002	<0.00007	<0.00007	<0.00007	0.00032	<0.00007	<0.00007	<0.00007		MW-AA -- 6.47
Nickel (mg/L)	0.1	0.0027	<0.002	<0.002	<0.002	0.0034	0.0028	0.0055		MW-B -- 6.77
Selenium (mg/L)	0.05	<0.002	<0.002	<0.002	<0.002	<0.002	0.0065	<0.002		MW-C -- 6.49
Sodium (mg/L)	160	3.5	2.8	2.3	2.8	2.5	2.2	4.2		MW-D -- 6.47
Thallium (mg/L)	0.002	<0.0007	<0.0007	<0.0007	<0.0007	<0.0007	<0.0007	<0.0007		MW-E -- 6.46
Vanadium (mg/L)	0.049**	<0.001	0.0013	<0.001	<0.001	<0.001	<0.001	<0.001		
Zinc (mg/L)	5	0.011	<0.001	0.0054	0.0066	0.001	0.016	0.032		
Inorganics										
Ammonia (mg/L)	2.8**	<0.003	<0.003	1.2	<0.003	<0.003	<0.003	<0.003		
Chlorides (mg/L)	250	6.8	5.3	4.6	6.1	4.4	3.9	4.5		
Nitrate (mg/L)	10	0.47	0.34	<0.008	0.28	0.19	0.22	<0.008		
Total Dissolved Solids (mg/L)	500	96	280	318	86	296	94	100		
Organics										
Acetone (µg/L)	700**	<3	<3	<3	<3	<3	<3	<3		
Benzene (µg/L)	1	0.2	<0.1	<0.1	<0.1	<0.1	0.5	0.6		
Chlorobenzene (µg/L)	100	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.6		
Chloromethane (µg/L)	2.7**	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6		
1,2-dichlorobenzene (µg/L)	600	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3		
1,4-dichlorobenzene (µg/L)	75	0.6	<0.2	1	2	<0.2	0.3	1		
1,1-dichloroethane (µg/L)	70**	0.4	<0.3	<0.3	<0.3	<0.3	0.4	<0.3		
1,2-dichloroethane (µg/L)	3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3		
1,1-dichloroethene (µg/L)	7	<0.8	<0.8	<0.8	<0.8	<0.8	<0.8	<0.8		
cis-1,2-dichloroethene (µg/L)	70	0.9	<0.3	<0.3	2	<0.3	4	0.4		
Ethylbenzene (µg/L)	30	<0.3	<0.3	<0.3	0.9	<0.3	<0.3	<0.3		
Methylene chloride (µg/L)	5	1	<1	<1	<1	<1	<1	<1		
Naphthalene (µg/L)	14**	<0.4	<0.4	<0.4	<0.4	<0.4	<0.4	6		
4-nitrophenol (µg/L)	56**	0.04	0.08	<0.04	0.4	0.1	<0.04	0.4		
Tetrachloroethene (µg/L)	3	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6		
Toluene (µg/L)	40	<0.2	0.2	<0.2	<0.2	0.3	0.4	0.3		
Total Xylenes (µg/L)	20	1	<0.9	<0.9	2	<0.9	0.7	0.6		
Total TTHMs *** (µg/L)	80	4	<1.1	<1.1	<1.1	<1.1	0.2	<1.1		
Trichloroethene (µg/L)	3	<0.3	<0.3	<0.3	<0.3	<0.3	2	<0.3		
Vinyl Chloride (µg/L)	1	<0.5	<0.5	<0.5	0.8	<0.5	2	<0.5		

Monitor Well Descriptions:

NE = not established

NA = not analyzed

NS = not sampled

B = background; C = compliance; D = detection; A =assessment /// S = surficial aquifer; I = intermediate aquifer (confined); F = Floridan aquifer

* = SOP FS 2200 (Ground water sampling)

** = minimum criteria (Chapter 62-777, F.A.C.)

*** TTHMs = sum of bromodichloromethane, dibromochloromethane, bromoform, chloroform

NOTE: THIS REPRESENTS THE INITIAL SAMPLING EVENT AT THESE WELLS

Analytical Results Summary for Ground Water Samples Collected at Class I/III Landfills

Facility Name -- Citrus Central Landfill

Analytical Laboratory -- ENCO Lab

Filtered Metals -- N

Equipment Blank --
(Y @ 1/5/06; N @ 1/27/06)

Duplicate --N

County -- Citrus

Date Sampled -- 1/5 & 1/27/06

GW Contour Map -- N

Sampling Frequency -- semi-annually

Date Received -- 2/16/06

Exceedances summarized -- Y

PARAMETERS	Ground Water Standard	Monitor Well Identification Number						Notes	
		MW-15 1/5/2006	Equip blk 1/5/2006	Trip blk 1/5/2006	MW-15 1/27/2006	Trip blk 1/27/2006		Date sampled	
Field Measurements									
Water Level Elevation	NE								
pH (Std. Units)	6.5 - 8.5	5.22			4.93				
Turbidity (NTU)	20*	9.85			2.38				
Conductivity (µmhos/cm)	NE	81			61				
Dissolved Oxygen (mg/L)	<20% sat*	0.66			0.29				
Temperature (°C)	NE	25.1			25.31				
Metals/Semimetals									
Antimony (mg/L)	0.006								
Arsenic (mg/L)	0.01								
Cadmium (mg/L)	0.005								
Chromium (mg/L)	0.1								
Iron (mg/L)	0.3								
Lead (mg/L)	0.015								
Mercury (mg/L)	0.002								
Nickel (mg/L)	0.1								
Selenium (mg/L)	0.05								
Sodium (mg/L)	160								
Thallium (mg/L)	0.002								
Vanadium (mg/L)	0.049**								
Zinc (mg/L)	5								
Inorganics									
Ammonia (mg/L)	2.8**								
Chlorides (mg/L)	250								
Nitrate (mg/L)	10								
Total Dissolved Solids (mg/L)	500								
Organics									
Acetone (µg/L)	700**								
Benzene (µg/L)	1								
Chlorobenzene (µg/L)	100								
Chloromethane (µg/L)	2.7**								
1,2-dichlorobenzene (µg/L)	600								
1,4-dichlorobenzene (µg/L)	75								
1,1-dichloroethane (µg/L)	70**								
1,2-dichloroethane (µg/L)	3								
1,1-dichloroethene (µg/L)	7								
cis-1,2-dichloroethene (µg/L)	70								
Ethylbenzene (µg/L)	30								
Methylene chloride (µg/L)	5								
Naphthalene (µg/L)	14**								
4-nitrophenol (µg/L)	56**								
Tetrachloroethene (µg/L)	3								
Toluene (µg/L)	40								
Total Xylenes (µg/L)	20								
Total TTHMs *** (µg/L)	80								
Trichloroethene (µg/L)	3								
Vinyl Chloride (µg/L)	1	<0.5	1	<0.5	1	<0.5			

Monitor Well Descriptions:

NE = not established

NA = not analyzed

NS = not sampled

B = background; C = compliance; D = detection; A =assessment /// S = surficial aquifer; I = intermediate aquifer (confined); F = Floridan aquifer

* = SOP FS 2200 (Ground water sampling)

** = minimum criteria (Chapter 62-777, F.A.C.)

*** TTHMs = sum of bromodichloromethane, dibromochloromethane, bromoform, chloroform

NOTE: THESE REPRESENT RESAMPLING EVENTS CONDUCTED AT MW-15

Analytical Results Summary for Ground Water Samples Collected at Class I/III Landfills

Facility Name -- Citrus Central Landfill

County -- Citrus

Sampling Frequency -- semi-annually

Analytical Laboratory -- ENCO Lab

Date Sampled -- 7/17 & 7/18/06

Date Received -- 9/15/06

Filtered Metals -- N

Equipment Blank -- Y

Duplicate --N

GW Contour Map -- Y

Exceedances summarized -- Y

(filtered samples collected at MW-10 and MW-10 resample)

PARAMETERS	Ground Water Standard	Monitor Well Identification Number								Notes (as needed)
		MW-10 A/F	MW-11 A/F	MW-12 AF	MW-13 AF	MW-14 AF	MW-15 AF	MW-17 AF	MW-10 Resample 8/31/06	
Field Measurements										
Water Level Elevation	NE	6.06	5.15	4.83	5.35	5.15	5.57	5.29		W/L from contour map (7/17/06)
pH (Std. Units)	6.5 - 8.5	4.65	7.1	6.67	5.31	6.79	4.78	4.96	4.7	
Turbidity (NTU)	20*	20.7	0.56	4.87	2.8	1.69	4.37	4.23	24.1	GW ELEVATIONS @ 7/17/06
Conductivity (µmhos/cm)	NE	62	361	600	93	519	48	68	60	MW-1R -- 5.33
Dissolved Oxygen (mg/L)	<20% sat*	0.81	1.34	0.46	1.21	0.78	1.22	1.18	0.31	MW-2 -- 6.86
Temperature (°C)	NE	29.26	26	26.28	26.72	25.51	25.3	26.04	26.78	MW-3 -- 6.27
Metals/Semimetals										MW-4R -- 6.79
Antimony (mg/L)	0.006	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	0.011	MW-5 -- 6.51
Arsenic (mg/L)	0.01	<0.002	<0.002	0.003	0.006	<0.002	<0.002	<0.002	<0.002	MW-6 -- 6.52
Cadmium (mg/L)	0.005	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	MW-7 -- 6.45
Chromium (mg/L)	0.1	<0.006	<0.006	<0.006	<0.006	<0.006	<0.006	<0.006	<0.006	MW-8R -- 5.29
Iron (mg/L)	0.3	1.39	<0.054	6.71	0.583	0.137	1.35	6.08	1.02	MW-9 -- 5.18
Lead (mg/L)	0.015	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	MW-16 -- 5.68
Mercury (mg/L)	0.002	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	MW-AA -- 5.19
Nickel (mg/L)	0.1	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	0.005	MW-B -- 5.46
Selenium (mg/L)	0.05	<0.002	<0.002	<0.002	<0.002	<0.002	0.008	<0.002	0.004	MW-C -- 5.3
Sodium (mg/L)	160	5.95	2.74	2.48	2.95	2.15	1.46	3.68	5	MW-D -- 5.18
Thallium (mg/L)	0.002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	MW-E -- 5.31
Vanadium (mg/L)	0.049**	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	
Zinc (mg/L)	5	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	
Inorganics										
Ammonia (mg/L)	2.8**	<0.003	<0.003	0.3	<0.003	<0.003	<0.003	<0.003	<0.003	
Chlorides (mg/L)	250	6.64	5.1	5.14	5.72	4.59	4.47	4.33	5.86	
Nitrate (mg/L)	10	0.272	0.336	0.317	0.266	0.321	0.232	0.248	0.183	
Total Dissolved Solids (mg/L)	500	114	246	370	118	336	82	40	30	
Organics										
Acetone (µg/L)	700**	<3	<3	<3	<3	<3	<3	<3	<3	
Benzene (µg/L)	1	2	<0.1	<0.1	<0.1	<0.1	0.6	<0.1	1	
Chlorobenzene (µg/L)	100	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.5	
Chloromethane (µg/L)	2.7**	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6	
1,2-dichlorobenzene (µg/L)	600	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	
1,4-dichlorobenzene (µg/L)	75	5	<0.2	<0.2	3	<0.2	<0.2	1	4	
1,1-dichloroethane (µg/L)	70**	1	<0.3	<0.3	0.7	<0.3	<0.3	<0.3	1	
1,2-dichloroethane (µg/L)	3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	
1,1-dichloroethene (µg/L)	7	<0.8	<0.8	<0.8	<0.8	<0.8	<0.8	<0.8	<0.8	
cis-1,2-dichloroethene (µg/L)	70	3	<0.3	<0.3	2	<0.3	5	<0.3	4	
Ethylbenzene (µg/L)	30	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3	
Methylene chloride (µg/L)	5	6	<1	<1	<1	<1	<1	5	5	
Naphthalene (µg/L)	14**	0.09	<0.09	<0.09	0.31	<0.09	<0.09	<0.09	NA	
4-nitrophenol (µg/L)	56**	NA	NA	NA	NA	NA	NA	NA	NA	
Tetrachloroethene (µg/L)	3	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6	<0.6	
Toluene (µg/L)	40	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	
Total Xylenes (µg/L)	20	10	<0.9	<0.9	1	<0.9	0.8	0.7	9	
Total TTHMs *** (µg/L)	80	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	
Trichloroethene (µg/L)	3	<0.3	<0.3	<0.3	<0.3	<0.3	2	<0.3	0.5	
Vinyl Chloride (µg/L)	1	5	<0.5	<0.5	<0.5	<0.5	1	<0.5	2	

Monitor Well Descriptions:

B = background; C = compliance; D = detection; A =assessment /// S = surficial aquifer; I = intermediate aquifer (confined); F = Floridan aquifer

NE = not established

* = SOP FS 2200 (Ground water sampling)

NA = not analyzed

** = minimum criteria (Chapter 62-777, F.A.C.)

NS = not sampled

*** TTHMs = sum of bromodichloromethane, dibromochloromethane, bromoform, chloroform

NOTE: THIS REPRESENTS A ROUTINE SAMPLING EVENT AT THESE WELLS

NOTE: WELLS MW-10, MW-15 AND MW-17 WERE NOT COMPLETED IN LIMESTONE

Analytical Results Summary for Ground Water Samples Collected at Class I/III Landfills

Facility Name -- Citrus Central Landfill

Analytical Laboratory -- ENCO Lab

Filtered Metals -- N

Equipment Blank -- Y

Duplicate -- N

County -- Citrus

Date Sampled -- 1/25 & 1/26/07

GW Contour Map -- Y

Sampling Frequency -- semi-annually

Date Received -- 6/1/07

Exceedances summarized -- Y

PARAMETERS	Ground Water Standard	Monitor Well Identification Number												Notes (as needed)
		MW-1R B/F	MW-2 B/F	MW-3 B/F	MW-7 B/F	MW-10 A/F	MW-11 A/F	MW-12 AF	MW-13 AF	MW-14 AF	MW-15 AF	MW-17 AF	MW-10 resample 2/26/07	
Field Measurements		4.82	6.19	5.75	5.93									
Water Level Elevation	NE	4.83	6.21	5.73	5.93	5.94	4.89	4.98	5.29	4.98	5.41	5.14		W/L from contour map (7/17/06)
pH (Std. Units)	6.5 - 8.5	5.02	3.99	4.11	4.99	4.1	7.04	6.56	5.11	6.71	4.44	4.54	4	
Turbidity (NTU)	20*	0.53	0.2	0.63	0.85	7.64	0.34	2.65	2.26	1.57	3.53	4.9	11.7	GW ELEVATIONS @ 1/22/07
Conductivity (umhos/cm)	NE	114	23	33	133	59	365	607	89	501	46	63	55	MW-1R -- 4.83
Dissolved Oxygen (mg/L)	<20% sat*	3.68	5.87	4.72	0.25	0.21	0.96	0.1	0.2	0.24	0.14	0.11	0.23	MW-2 -- 6.21
Temperature (°C)	NE	19.26	21.78	21.47	21.54	26.77	25.56	25.97	27.29	25.39	26.13	25.81	25.94	MW-3 -- 5.73
Metals/Semimetals														MW-4R -- 6.26
Antimony (mg/L)	0.006	0.00273	0.00283	0.00291	0.00358	0.00257	0.00251	0.00263	0.00273	0.0028	0.00301	0.00325		MW-5 --
Arsenic (mg/L)	0.01	<0.00098	<0.00098	<0.00098	<0.00098	<0.00098	0.00098	0.00436	0.00511	<0.00098	0.00452	0.00242		MW-6 --
Cadmium (mg/L)	0.005	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003		MW-7 --
Chromium (mg/L)	0.1	0.00385	<0.0012	<0.0012	<0.0012	0.00562	0.00382	0.00383	0.00403	0.00476	0.00438	0.00472		MW-8R --
Iron (mg/L)	0.3	0.0467	0.0346	<0.0067	0.0162	1.61	0.0212	6.49	1.35	0.148	1.99	5.86		MW-9 --
Lead (mg/L)	0.015	0.00216	<0.00017	0.0123	<0.00017	0.000952	0.000499	0.000644	0.000556	0.000527	0.000627	0.000597		MW-16 --
Mercury (mg/L)	0.002	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011	<0.00011		MW-AA --
Nickel (mg/L)	0.1	0.00804	<0.00047	0.00182	0.00176	0.00422	0.00205	0.00392	0.00429	0.00393	0.00294	0.00288		MW-B --
Selenium (mg/L)	0.05	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	0.00826	0.00195		MW-C --
Sodium (mg/L)	160	8.65	2.46	2.96	25	5.51	3.06	2.72	3.33	2.83	1.97	3.78		MW-D --
Thallium (mg/L)	0.002	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029		MW-E --
Vanadium (mg/L)	0.049**	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038		
Zinc (mg/L)	5	0.0233	0.0141	0.0911	0.0172	0.0243	0.00783	0.0112	0.0154	0.0181	0.0223	0.0155		
Inorganics														
Ammonia (mg/L)	2.8**	<0.003	<0.003	<0.003	0.01	<0.003	<0.003	0.53	<0.003	0.003	0.038	0.042		
Chlorides (mg/L)	250	3.8	2.8	3.8	6	5.8	4.6	4.3	4.6	3.9	2.8	3.2		
Nitrate (mg/L)	10	6.2	0.13	0.26	0.12	0.11	0.26	0.12	0.11	0.1	0.11	0.11		
Total Dissolved Solids (mg/L)	500	100	32	42	98	58	210	330	68	290	44	44		
Organics														
Acetone (µg/L)	700**	<2.6	<2.6	<2.6	<2.6	5.8	<2.6	<2.6	<2.6	<2.6	<2.6	<2.6		
Benzene (µg/L)	1	<0.48	<0.48	<0.48	<0.48	1.4	<0.48	<0.48	<0.48	<0.48	0.49	<0.48	1.1	
Chlorobenzene (µg/L)	100	<0.21	<0.21	<0.21	<0.21	0.43	<0.21	0.27	<0.21	<0.21	<0.21	0.49		
Chloromethane (µg/L)	2.7**	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82		
1,2-dichlorobenzene (µg/L)	600	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27		
1,4-dichlorobenzene (µg/L)	75	<0.24	<0.24	<0.24	<0.24	4	<0.24	1.5	2	<0.24	0.32	1.1		
1,1-dichloroethane (µg/L)	70**	<0.6	<0.6	<0.6	<0.6	1.4	<0.6	<0.6	0.67	<0.6	<0.6	<0.6		
1,2-dichloroethane (µg/L)	3	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94		
1,1-dichloroethene (µg/L)	7	<0.83	<0.83	<0.83	<0.83	<0.83	<0.83	<0.83	<0.83	<0.83	<0.83	<0.83		
cis-1,2-dichloroethene (µg/L)	70	<0.75	<0.75	<0.75	<0.75	5	<0.75	<0.75	1.9	<0.75	3.3	<0.75		
Ethylbenzene (µg/L)	30	<0.99	<0.99	<0.99	<0.99	<0.99	<0.99	<0.99	<0.99	<0.99	<0.99	<0.99		
Methylene chloride (µg/L)	5	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	
Tetrachloroethene (µg/L)	3	<0.65	<0.65	<0.65	<0.65	<0.65	<0.65	<0.65	<0.65	<0.65	<0.65	<0.65		
Toluene (µg/L)	40	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25		
Total Xylenes (µg/L)	20	<0.6	<0.6	<0.6	<0.6	5.1	<0.6	<0.6	0.58	<0.6	<0.6	<0.6		
Total THMs *** (µg/L)	80	<1.79	1.7	<1.79	<1.79	<1.79	<1.79	<1.79	<1.79	<1.79	<1.79	<1.79		
Trichloroethene (µg/L)	3	<0.71	<0.71	<0.71	<0.71	<0.71	<0.71	<0.71	<0.71	<0.71	1.3	<0.71		
Vinyl Chloride (µg/L)	1	<0.52	<0.52	<0.52	<0.52	2.5	<0.52	<0.52	1.1	<0.52	0.91	<0.52	1.2	

Monitor Well Descriptions:

NE = not established

NA = not analyzed

NS = not sampled

B = background; C = compliance; D = detection; A = assessment /// S = surficial aquifer; I = intermediate aquifer (confined); F = Floridan aquifer

* = SOP FS 2200 (Ground water sampling)

** = minimum criteria (Chapter 62-777, F.A.C.)

*** THMs = sum of bromodichloromethane, dibromochloromethane, bromoform, chloroform

NOTE: THIS REPRESENTS A ROUTINE SAMPLING EVENT AT THESE WELLS

NOTE: WELLS MW-10, MW-15 AND MW-17 WERE NOT COMPLETED IN LIMESTONE

Analytical Results Summary for Ground Water Samples Collected at Class I/III Landfills

Facility Name -- Citrus Central Landfill

Analytical Laboratory -- ENCO Lab

Filtered Metals -- N

Equipment Blank -- Y

Duplicate --N

County -- Citrus

Date Sampled -- 7/17 to 7/20/07

GW Contour Map -- Y

Sampling Frequency -- semi-annually

Date Received -- 11/1/07

Exceedances summarized -- Y

PARAMETERS	Ground Water Standard	Monitor Well Identification Number															Notes (as needed)
		MW-1R B/F	MW-2 B/F	MW-3 B/F	MW-6 I/F	MW-7 B/F	MW-10 C/F	MW-11 C/F	MW-12 C/F	MW-13 C/F	MW-14 C/F	MW-15 C/F	MW-17 C/F	MW-18 A/F	MW-19 A/F		
Field Measurements		4.44	5.37	NS	5.32	5.09	5.27	4.65	4.72	4.85	4.65	4.87	4.83	5.22	5.29	W/L from day of sampling	
Water Level Elevation	NE	4.43	5.37	NS	5.33	5.09	5.59	4.58	4.75	4.86	4.65	4.86	4.81	5.15	5.27	W/L from contour map	
pH (Std. Units)	6.5 - 8.5	5.39	4.87	4.92	4.02	5.43	4.65	7.11	6.65	5.2	6.84	4.71	4.96	5.87	6.41		
Turbidity (NTU)	20*	0.43	0.27	0.19	0.32	1.45	2.27	2.06	3.23	4.9	2.19	1.25	4.28	53.5	4.1	GW ELEV @ 7/16/07	
Conductivity (µmhos/cm)	NE	107	23	54	702	135	60	366	595	86	492	45	68	494	1.68	MW-4R -- 5.48	
Dissolved Oxygen (mg/L)	<20% sat*	2.58	1.52	4.07	0.38	0.22	0.34	1.2	0.18	0.44	0.36	0.11	0.09	1.4	0.99	MW-5 -- 5.28	
Temperature (°C)	NE	28.76	22.75	27.86	25.08	26.86	24.48	24.23	25.19	24.49	23.74	23.2	24.21	26.21	27.25	MW-8R -- 4.46	
Metals/Semimetals																MW-9 -- 4.40	
Antimony (mg/L)	0.006	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	<0.00076	MW-16 -- 4.81	
Arsenic (mg/L)	0.01	<0.00098	<0.00098	<0.00098	<0.00098	<0.00098	0.00148	<0.00098	0.00217	0.00356	<0.00098	0.00259	<0.00098	<0.00098	<0.00098	MW-AA -- 4.45	
Cadmium (mg/L)	0.005	0.000435	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	0.000487	0.000583	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	MW-B -- 4.53	
Chromium (mg/L)	0.1	<0.0012	<0.0012	<0.0012	0.00144	<0.0012	0.00188	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	MW-E -- 4.46	
Iron (mg/L)	0.3	<0.0067	0.027	0.00847	0.108	<0.0067	4.49	0.0225	6.1	2.02	0.113	3.29	7.57			PZ-1 -- 4.73	
Lead (mg/L)	0.015	<0.00017	0.00061	0.0278	0.000768	0.00114	<0.00017	<0.00017	<0.00017	<0.00017	0.000299	<0.00017	<0.00017	<0.00017	<0.00017	PZ-2 -- 4.52	
Mercury (mg/L)	0.002	<0.0000092	<0.0000092	0.0000094	0.000034	<0.0000092	<0.0000092	<0.0000092	<0.0000092	<0.0000092	<0.0000092	<0.0000092	<0.0000092	<0.0000092	<0.0000092		
Nickel (mg/L)	0.1	0.00516	<0.00047	0.0024	0.0283	0.00284	0.00565	0.00144	0.00276	0.00674	0.00234	0.00465	0.00501				
Selenium (mg/L)	0.05	<0.0017	<0.0017	<0.0017	0.00265	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	0.00173	0.00736	<0.0017	<0.0017	<0.0017		
Sodium (mg/L)	160	7.71	2.68	4.66	94.6	19.5	5.26	2.96	2.56	3.33	2.49	1.61	3.75				
Thallium (mg/L)	0.002	<0.00029	<0.00029	0.000325	0.00171	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029	<0.00029		
Vanadium (mg/L)	0.049**	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038	<0.00038		
Zinc (mg/L)	5	0.016	0.0136	0.0429	0.0204	0.0145	0.0217	0.00384	0.00434	0.0139	0.00377	0.0292	0.0138				
Inorganics																	
Ammonia (mg/L)	2.8**	<0.008	<0.008	<0.008	0.59	<0.008	0.039	<0.008	0.68	<0.008	<0.008	0.025	0.024				
Chlorides (mg/L)	250	3.4	2.5	5.8	150	5.3	5.1	4	3.6	4.1	3.5	2.1	2.5				
Nitrate (mg/L)	10	5.8	0.5	0.72	18	0.41	0.24	0.13	0.52	0.5	0.74	0.13	0.63				
Total Dissolved Solids (mg/L)	500	90	42	62	370	110	48	390	340	60	270	36	66				
Organics																	
Acetone (µg/L)	700**	<0.74	<0.74	<0.74	<2.6	<0.74	<0.74	<0.74	<0.74	<0.74	<2.6	<2.6	<0.74			MW-6, MW-14 & MW-15 reported at different MDLs	
Benzene (µg/L)	1	<0.32	<0.32	<0.32	0.52	<0.32	2.5	<0.32	0.45	0.93	<0.48	<0.48	0.99	0.83	0.35		
Chlorobenzene (µg/L)	100	<0.27	<0.27	<0.27	<0.21	<0.27	0.85	<0.27	<0.27	<0.27	<0.21	<0.21	0.54				
Chloromethane (µg/L)	2.7**	<0.35	<0.35	<0.35	<0.82	<0.35	<0.35	<0.35	<0.35	<0.35	<0.82	<0.82	<0.35				
1,2-dichlorobenzene (µg/L)	600	<0.33	<0.33	<0.33	<0.27	<0.33	0.47	<0.33	<0.33	<0.33	<0.27	<0.27	<0.33				
1,4-dichlorobenzene (µg/L)	75	<0.33	<0.33	<0.33	0.31	<0.33	5.9	<0.33	1.4	3.6	<0.24	<0.24	1.5				
1,1-dichloroethane (µg/L)	70**	<0.28	<0.28	<0.28	0.7	<0.28	1.4	<0.28	<0.28	0.62	<0.6	<0.6	<0.28				
1,2-dichloroethane (µg/L)	3	<0.18	<0.18	<0.18	<0.94	<0.18	0.25	<0.18	<0.18	<0.18	<0.94	<0.94	<0.18				
1,1-dichloroethene (µg/L)	7	<0.4	<0.4	<0.4	<0.83	<0.4	<0.4	<0.4	<0.4	<0.4	<0.83	<0.83	<0.4				
cis-1,2-dichloroethene (µg/L)	70	<0.18	<0.18	<0.18	<0.75	<0.18	7.3	<0.18	0.23	2.6	<0.75	3.2	0.42				
Ethylbenzene (µg/L)	30	<0.32	<0.32	<0.32	<0.99	<0.32	0.36	<0.32	<0.32	<0.32	<0.99	<0.99	<0.32				
Methylene chloride (µg/L)	5	<0.19	<0.19	<0.19	<1	<0.19	4.5	<0.19	<0.19	<0.19	<1	<1	<0.19				
Tetrachloroethene (µg/L)	3	<0.47	<0.47	<0.47	<0.65	<0.47	0.81	<0.47	<0.47	0.6	<0.65	<0.65	<0.47				
Toluene (µg/L)	40	<0.35	<0.35	<0.35	0.42	<0.35	0.59	<0.35	<0.35	<0.35	0.27	0.27	<0.35				
Total Xylenes (µg/L)	20	<0.65	<0.65	<0.65	0.93	<0.65	9.3	<0.65	<0.65	1.24	<0.6	<0.6	0.87				
Total TTHMs *** (µg/L)	80	<0.92	2.9	0.46	11	<0.92	<0.92	<0.92	<0.92	<0.92	<1.92	<1.92	<0.92				
Trichloroethene (µg/L)	3	<0.26	<0.26	<0.26	<0.71	<0.26	0.77	<0.26	<0.26	0.28	<0.71	0.83	<0.26				
Vinyl Chloride (µg/L)	1	<0.91	<0.91	<0.91	1.4	<0.91	2.3	<0.91	<0.91	<0.91	<0.52	0.64	<0.91	<0.91	<0.91		

Monitor Well Descriptions:

NE = not established

NA = not analyzed

NS = not sampled

* = SOP FS 2200 (Ground water sampling)

** = minimum criteria (Chapter 62-777, F.A.C.)

*** TTHMs = sum of bromodichloromethane, dibromochloromethane, bromoform, chloroform

NOTE: THIS REPRESENTS A ROUTINE SAMPLING EVENT AT THESE WELLS

NOTE: WELLS MW-10, MW-15 AND MW-17 WERE NOT COMPLETED IN LIMESTONE

Morris, John R.

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Wednesday, December 26, 2007 1:46 PM
To: Morris, John R.; Pelz, Susan
Cc: Glenn McCracken; Michael Arnold; Tammie Gardner
Subject: Ground water site assessment report and consent agreement

Susan and John,

JEA submitted the SAR in late October for your review. I'm wondering when we may receive your comments on that report?

My letter dated October 24 requested, based on the Department's approval of the SAR, which we feel is the last work element to be completed, that the Consent Agreement be closed. Are you in agreement?

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax

May 30, 2007

Mr. John Morris, P.G.
Florida Department of Environmental Protection – Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
JUN - 1 2007
SOUTHWEST DISTRICT
TAMPA

RE: First Semiannual 2007 Semiannual Groundwater Monitoring Report
Citrus County Landfill
Permit No. 21375-008-SO/01
Jones Edmunds Project No. 03860-025-01

Dear Mr. Morris:

This report presents data from the First Semiannual 2007 sampling event at the Citrus County Landfill, performed on January 22, 23, 24, 25, and 26, 2007. A limited resampling for Vinyl Chloride in MW-13 was conducted on February 26, 2007. The results of that resampling are included in this report.

All groundwater monitoring wells (including the groundwater investigation wells) were sampled during this event under the above referenced permit for the semiannual parameters. As stated in the Second Semiannual 2006 report, samples from the investigation wells were also collected and analyzed for the eight remaining parameters included in the Appendix II parameter list. These parameters have been reported previously with reporting limits that were greater than DEP PQL's. A summary of results reported for these parameters is summarized in the table below:

Parameter	DEP MCL	DEP PQL*	January 2007 Sampling***
2,4-Dinitrotoluene	0.05 µg/L	0.2 µg/L	<0.012 µg/L
Chlorobenzilate	0.1 µg/L	0.8 µg/L	<0.015 µg/L
Diallate	0.6 µg/L	**	<0.021 µg/L
Dibenzo(a,h)anthracene	0.005 µg/L	0.2 µg/L	<0.0780 µg/L
Dimethoate	51.4 µg/L	**	<0.019 µg/L
Disulfoton	0.3 µg/L	0.4 µg/L	<0.042 µg/L
Kepone	0.004 µg/L	6 µg/L	<3.5 µg/L
Pentachloronitrobenzene	0.1 µg/L	0.3 µg/L	<0.019 µg/L
Phorate	1.4 µg/L	**	<0.029 µg/L

* = DEP "Guidance for the Selection of Analytical Methods and for the Evaluation of Practical Quantitation Limits", October 12, 2004

** = No PQL listed

*** = Well sampled and reported as BDL for all parameters listed are MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, and MW-17

← ADEQUATELY
ADDRESSSED BY
SUPPLEMENTAL
SAMPLING
CONDUCTED 7/06

Leachate effluent was collected on January 25th and those results were submitted separately on April 12, 2007.

SUPPLEMENTAL INITIAL SAMPLING AT "ASSESSMENT WELLS" ON 1/22 TO 1/26/07 ADDRESSED
DEP COMMENTS REGARDING ELICITED MDLS REPORTED FOR:

- CHLOROBENZILATE
- DIALLATE
- DIMETHOATE
- 2,4-DINITROTOLUENE
- DISULFOTON
- KEPONE
- PENTACHLORONITROBENZENE
- PHORATE

730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352-377.3166 Fax
www.jonesedmunds.com

Mr. John Morris, P.G.
May 30, 2007
Page 2

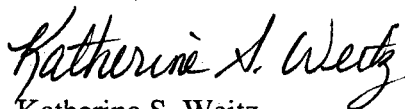
Analysis results compared to groundwater standards are presented in Attachment 2. Vinyl Chloride concentrations initially reported in MW-13 were not confirmed by resample. The data presented in Attachment 2 indicates that concentrations reported during this event are consistent with historical values.

A 62-780 site assessment is being conducted to address the levels of Benzene and Vinyl Chloride reported in MW-10.

The Second Semiannual 2007 sampling event will be conducted in accordance with the sampling requirements outlined in Permit Modification No. 21375-011 received in April 2007.

If you have any questions regarding this report, please contact us at (352) 377-5821.

Sincerely,



Katherine S. Weitz
Project Manager

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
JUN - 1 2007
SOUTHWEST DISTRICT
TAMPA

xc: Susan Metcalfe, P.G.

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Attachment 1:	Groundwater Elevation Data and Groundwater Contour Map
Attachment 2:	Analysis Results Compared to Groundwater Standards
Attachment 3:	Groundwater and Leachate Parameters At or Above the Laboratory Detection Limit
Attachment 4:	Parameter Monitoring Report Forms
Attachment 5:	Original Laboratory Data
Attachment 6:	Original Field Data

JONES EDMUNDS

ENF. FILE

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
JAN 10 2007
SOUTHWEST DISTRICT
TAMPA

January 10, 2007

Mr. John Morris, P.G.
Florida Department of Environmental Protection – Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RE: Semiannual Groundwater Monitoring Report – Second Semiannual 2006
Citrus County Landfill
Permit No. 21375-008-SO/01
Jones Edmunds Project No. 03860-022-01

Dear Mr. Morris:

This report presents data from the Second Semiannual 2006 sampling event at the Citrus County Landfill, performed on July 17, 18, 19, 20, and September 22, 2006.

All groundwater monitoring wells including the groundwater investigation wells were sampled during this event and analyzed for the semiannual parameters. Additionally, the investigation wells were analyzed for select Semivolatile Organic Compounds (SVOC's) by EPA 8270. The additional SVOC's are included within this report and are being submitted as supplemental data to the initial sampling of these wells in November, 2005.

An additional sampling of the investigation wells is scheduled for January, 2007 in order to collect and report the eight remaining parameters included in the Appendix II Parameter list that were previously submitted with reporting limits that were greater than DEP PQL's. Kepone is not scheduled to be collected in these wells as it is not possible with current technology to report down to the DEP PQL for this parameter. Communication received on October 30, 2006 from DEP's QA Department by the County's subcontract laboratory Environmental Conservation Laboratories (ENCO) indicated that the laboratory has demonstrated its willingness to meet the Department's criteria and recommend that the past data submitted for the investigation wells be accepted. After a further telephone conversation between your office, Jones Edmunds, and Citrus County on November 21, 2006, it is our understanding that the submission of data collected in January, 2007 with reporting levels at or below DEP PQL's, will complete the data required to demonstrate compliance with the consent agreement.

Leachate effluent was collected on September 22nd, those results were submitted under separate cover on October 12, 2006.

SUPPLEMENTAL INITIAL SAMPLING AT "ASSESSMENT WELLS" ON 7/17 & 7/18/06

ADDRESS OF DEP COMMENTS REGARDING ELIMATED MOLS

REMOVED FOR

BENTZ (a) ANTHRACENE

BENTZ (b) FLUORANTHENE

BENTZ (k) FLUORANTHENE

BENTZ (e) PYRENE

DELETED (a, b)

ANTHRACENE

INDENO (1,2,3-cd)

PHENOL

730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone

352-377.3166 Fax

www.jonesedmunds.com

Mr. John Morris, P.G.

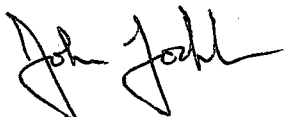
January 10, 2007

Page 2

Analysis results compared to groundwater standards are presented in Attachment 2. The data presented in Attachment 2 indicates that concentrations reported during this event are consistent with historical values with the following exceptions: Benzene (2 $\mu\text{g/L}$), Methylene Chloride (6 $\mu\text{g/L}$), and Vinyl Chloride (5 $\mu\text{g/L}$) in groundwater investigation well MW-10 are first time exceedances. MW-10 was resampled on August 31, 2006 confirming the exceedances mentioned above at the following levels: Benzene (1 $\mu\text{g/L}$), Methylene Chloride (5 $\mu\text{g/L}$), and Vinyl Chloride (2 $\mu\text{g/L}$). Results of that resampling are included in this report. Assessment actions under Rule 62-780 have been initiated to address exceedances in MW-10.

If you have any questions regarding this report, please contact us at (352) 377-5821.

Sincerely,



John D. Locklear, P.G.

Project Manager

xc: Susan Metcalfe, P.G.

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Attachment 1:	Groundwater Elevation Data and Groundwater Contour Map
Attachment 2:	Analysis Results Compared to Groundwater Standards
Attachment 3:	Groundwater and Leachate Parameters At or Above the Laboratory Detection Limit
Attachment 4:	Parameter Monitoring Report Forms
Attachment 5:	Original Laboratory Data
Attachment 6:	Original Field Data

Watson, Stephanie M.

From: Morris, John R.
Sent: Thursday, January 10, 2008 7:50 AM
To: Watson, Stephanie M.
Subject: FW: SAR status

I didn't respond to her e-mail dated 12/26/07. Should we talk with Susan about how to respond?

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Wednesday, January 09, 2008 3:28 PM
To: Morris, John R.
Cc: Tammie Gardner
Subject: SAR status

John,
What can you tell me about the schedule for reviewing the SAR which was submitted by Jones Edmunds in October? Sorry to be a pest but my boss is bugging me about closing out that project. Thanks.
Susie

Citrus County
CO file

Pelz, Susan

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Thursday, February 08, 2007 3:51 PM
To: Morris, John R.; Morgan, Steve; Pelz, Susan
Cc: Carmen Bruno; Glenn McCracken; Michael Arnold; Bo Bruner; John Locklear; Chris Kuzler
<ckuzler@kingengineering.com>; John Banks
Subject: Meeting Minutes 020507.doc
Attachments: Meeting Minutes 020507.doc



Meeting
es 020507.doc

Susan and group,
I have attached our summary of the meeting between Citrus County, our consultants and your group held on Monday February 5. Thank you for your time and suggestions for the several projects we discussed. The last section includes our understanding of who will take action based on that meeting.
Please let us know if there are any changes based on your notes.
Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax

**CITRUS COUNTY/ CONSULTANTS/ FDEP SOLID WASTE
MEETING MINUTES
FEBRUARY 5, 2007**

ITEMS SHOWN IN ITALICS ARE ADDITIONS OR MODIFICATIONS TO THE PREVIOUSLY TRANSMITTED AGENDA

1. ATTENDEES

*County staff – Glenn McCracken, Michael Arnold, Carmen Bruno, Susan Metcalfe
FDEP solid waste regulatory personnel – Susan Pelz, John Morris, Steve Morgan
Consultants – John Locklear – Jones Edmunds & Associates, John Banks – SCS
Engineers, Chris Kuzler – King Engineering, Bo Bruner – CH2M Hill.*

2. OTHER COUNTY PERSONNEL CHANGES

*Commission Chairman – Dennis Damato, County Administrator – June Fisher, Assistant
County Administrator – Tom Dick*

3. CONSENT AGREEMENT ACTIVITIES – County staff & John Locklear (Jones, Edmunds & Associates)

a. Sublease,

Completed to FDEP staff satisfaction by deadline

b. Donations to State,

FDEP (regulatory) staff has no issues or need to have reports on progress

c. Minor Permit Modification Application and Review Comments

Application complete, FDEP ready to issue permit,

*Discussed compliance deadline of 90 days to abandon MW-C, MW-D and gas
probes, previous compliance and intermediate wells retained as piezometers*

Gas probe abandonment – Discussed abandonment procedures.

*Groundwater and Gas sampling network changes, next semiannual event (July
07) will be for new network only*

New groundwater pumps, no need to provide additional information

d. Groundwater Site Assessment

*MCL vs PQL – State lab will accept previous data for Kepone. Meeting the PQL is
not required due to reactive nature. State lab will require that our analytical lab meet PQL
but not the MCL for the 7 other remaining semi-volatile compounds for which previous
analysis could not detect low enough levels.*

*Department approval of proposed scope – Discussed proposed well locations,
groundwater flow direction, difference in 62-780 requirements for zone of discharge
boundary vs. property boundary*

*Field work status – 2 additional groundwater wells (MW-18 and MW-19) and 2
additional piezometers (PZ1 and PZ2) installed January 22nd week to meet 62-780 deadline of
January 29. Wells were developed last week, to be sampled next week. Water level recorders to
be installed next. FDEP requested preliminary data on water levels within 30 days.*

4. OPERATING ISSUES – County staff and John Banks; SCS Engineers

a. Closed site

1) Firing range modifications

FWC range will be smaller, but overlap Citrus County sublease
Discussed changes from information presented last year with permit modification. FDEP staff wants an as-built after it is completed, no concerns relative to who is leaseholder.

2) "7-acre" cell drainage situation / options

Discussed plan and cross sections of "7-acre cell" located in northeast quadrant of closed 60-acre site. Actual footprint is about 10.5 acres. Bottom liner is single layer of HDPE; cap is PVC. Waste settlement prevents surface drainage, previous additions of soil to promote drainage surcharged the fill, GPR survey reveals PVC cap has a bowl that prevents subsurface drainage. This will require action.

Permitting and construction requirements/ options

Discussed several options: 1) Remove (and reclaim material) soil cover over cap, puncture/remove PVC cap, fill with MSW to a new configuration with ~ 7% slopes, reclose. 2) Remove soil cover over cap, puncture/remove PVC cap, fill with C & D waste to a new configuration with ~ 7% slopes, reclose. 3) Remove soil cover over cap in a limited area, remove waste to make a notch in cap to allow gravity drainage, repair cap in notch area, regrade soil cover to improve surface drainage to coordinate with subsurface drainage 4) Remove soil, install new liner and leachate collection system above the old cap and permit as a vertical expansion for MSW disposal. 5) Deal with stormwater in the leachate collection system as the cap continues to sag and potentially deteriorates.

FDEP staff indicated Option 1 is unlikely to be permissible, because original liner does not meet current rule, but County could ask for alternate procedure from Tallahassee. FDEP staff will consult with Richard Tedder. Option 2 probably could be permitted at the local level as a "Solid Waste Construction – Other". Issues of concern would include how long to fill, construction conditions of dewatering, odor and gas monitoring, sequence of construction, operations plan would have to be modified. Option 3 probably could be permitted at the local level with the same type of permit application. Issues of concern would be exposure and deterioration of the PVC cap, resulting difficulty to seal the new material to the old, potential further settlement might make the drainage repair temporary. Option 4 could be permissible as a vertical expansion at local level. Issues would be slope stability, leachate collection slope, impact of future settlement on new facilities. Option 5 was not discussed in detail.

b. Active site

Proposed interim drainage improvements

Discussed what notice is required to install open-channel downchutes on the north slope of the south DRA, underlain by dirt. Included in closure plan, OK to construct at any time.

5. REPLACE CSA AND SCALEHOUSE / CONSTRUCT NEW TRANSFER STATION – County Staff, Chris Kuzler – King Engineering and Bo Bruner – CH2M Hill

a. Introduce preliminary design concept

Similar to Hillsborough South County project – replace existing CSA and SH in area north of cell, east of existing CSA, add TS in same general area. County wants CSA construction completed earlier than transfer station. Design will be concurrent, but permitting of TS and possibly construction may be separate. Looking for most expedient permitting path.

b. Discuss options for permitting including timing and sequence

Modification for replacement facilities

King suggests submitting CSA and SH replacement, which are exempt from permitting, with concurrent ERP application for (?) north half of site and a minor modification of the landfill operating permit by modifying the pertinent sections of the operations plan and site plan only, to be completed before the new facilities are in use. (Solid Waste Construction – Other - \$1K fee suggested by FDEP)

Alternate would be an intermediate permit modification to the existing landfill permit (\$5K fee)

Stormwater permit coordination

Douglas Hyman, stormwater permitting rep, could not attend. FDEP Solid Waste staff indicated that keeping the old SWFWMD permit for the landfill (south half) and getting a new ERP for the north half would be simplest. Also that the ERP must be in place before site work can be done. The selected option will require design activities sufficient to determine if space is available in the north half for any required stormwater ponds.

Construction/operation for new transfer station

A separate solid waste processing facility construction/operation permit application could be submitted for the new transfer station. It would be the County's option whether to keep it separate or combine with other facilities in the future. FDEP staff indicated this will take longer to review.

c. Discuss impact of construction options on design and permitting

Design-bid-build – results in more detailed construction specs and drawings.

Design/CM, or Design/CM at risk, or Design/build results in more contractor input early in the project (during design) and less detailed specifications, drawings. FDEP Southwest District SW staff does not have any experience with other than traditional construction contracts. Permit application set will require construction level drawings, no schematics. Their (FDEP Solid Waste) review of roadways, drainage, site work, electrical and structural is less rigorous than items pertinent to Solid Waste rules compliance like leachate collection, litter and odor control, and waste removal. As long as the ERP is in place, FDEP Solid Waste would not object to site work beginning before the transfer station permit was issued.

Initial response is 30 days after the application, usually resulting in a request for additional information (RAI). After a complete application is received (all RAI's issued and responded to) it takes 90 days to issue notice of intent to issue. Advertising and 30-day comment period follows, then permit to construct can be issued.

6. COUNTY ISSUES – County staff

a. HHW program changes – paint *Now accepting all paint products 3 days per week. Latex goes to recycling, oil paint is boxed for HW contractor and tars are bulked for HW contractor. OK to add this to the next permit modification.*

b. Regional emergency disposal agreements

Model on mutual aid agreements

Counties in the region are working on an emergency interlocal agreement for waste disposal at alternate sites when their own facilities are: not accessible, not functional or cannot deal with the volume of MSW created by a disaster by increasing hours, manpower etc.

c. Concurrency

Disposal capacity reservations for approved but undeveloped lots vs actual waste stream growth. "Site life" for annual capacity reports and closure cost escrow.

Potential Phase 3 cell construction – line the north slope and fill to grade only

Number of approved but undeveloped lots exceeds the number of improved lots.

Recently adopted concurrency requirement (SB 360) and related County ordinance, will require

County to have reserved solid waste disposal capacity for that waste before we can approve new development. (or have the needed facility in the active capital improvement program before the development construction would be complete) Approach and timing have not been decided yet, but could include remaining Phase 2 cell capacity, transfer station (other end disposal facility) capacity and/or "Phase 3 capacity".

7. ACTION ITEMS -

- a. JEA (for County) will prepare an interim update letter on SAR activities after survey and initial water level data collection is complete. Letter will address John Morris' issue with groundwater flow direction, mounding in water table and definition of ZOD vs. "offsite" as controlled by 62-780 requirements. It will also address the regulatory or investigative need for an additional well.
- b. FDEP will issue permit modification on groundwater and gasmonitoring. County and JEA will review permit when received.
- c. JEA (for County) will prepare a letter as soon as analytical data is available to demonstrate compliance with the PQL/MCL levels for the eight parameters for all new groundwater monitoring wells according to State Lab criteria. Seven of nine parameters will have results from different methodology, one will be exempt and one does not have a method PQL that will reach the MCL. This will close out that requirement (Paragraph 8) of the Consent Agreement.
- d. JEA (for County) will abandon MW-C, MW-D and select gas wells within 90 days of permit issuance. (Grout holes where pipe cannot be pulled; backfill with sand for probes where pipe can be removed).
- e. County will submit an as-built drawing of new FWC- Hunter Safety range when it is complete. There is no timetable for construction, pending outcome of sublease issues with Forestry and agreement between County and FWC.
- f. County will submit as as-built drawing of the drainage downchutes after completed and show on site plan.
- g. FDEP will consult Richard Tedder on whether 7-acre cell improvement Options 1(reopen as Class 1) and 2 (reopen as C& D or Class 3) are permittable. County will evaluate "7-acre" drainage repair options relative to permitting, costs and operational considerations with SCS and report back to FDEP. SCS will prepare design/construction cost estimate for County to budget in FY starting October 2007.
- h. King/CH2MHill will complete the scope for the first contract – Preliminary Engineering and submit that to the County for approval. Work on that project must be partly to mostly complete before the County decides how to format the permit submittals and the construction contracts. No applications would be submitted for several months.



Board of County Commissioners
DEPARTMENT OF PUBLIC WORKS
SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Inglis/Yankeetown area Toll Free (352) 489-2120

October 24, 2007

Dept. Of Environmental Protection

Susan J. Pelz, P.E.
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

OCT 26 2007

Southwest District

Re: Citrus County Central Landfill
Permit No. 21375-008-SO/01
Consent Agreement OGC File No. 05-1078

Dear Ms. Pelz:

Your office recently received a report prepared by Jones Edmunds & Associates, Inc. for Citrus County, entitled Citrus County Central Landfill, Site Assessment Report in accordance with Chapter 62-780-600(8) FAC, which should be the final compliance item related to the referenced Consent Agreement. Paragraphs 6, 7, 8, 9, 10, 11, 12, 15 and 18 included specific performance criteria for the County, which we feel have now been met. This is to request that the Department provide the County with written confirmation of completion of these activities and closure of the Consent Agreement.

Please let me know if you need additional information.

Yours truly,

Susan Metcalfe, P.G.
Director

SM

CC: Dennis Damato, Chairman, BOCC
June Fisher, County Administrator
Glenn McCracken, Director, Public Works Department
John Banks, SCS Engineers, Tampa
Tammie Gardner, JEA, Gainesville

LETTER OF TRANSMITTAL



TO:	Mr. John Morris, P.G. Southwest District Florida Dept. of Environmental Protection 13051 North Telecom Pkwy. Temple Terrace, FL 33637	DATE	10/19/2007
		JOB. NO.	03860-028-01-1000
		RE:	Citrus Co. Central L/F – Site Assessment Report

WE ARE SENDING YOU VIA:

- | | |
|--|--|
| <input type="checkbox"/> U.S. Mail | <input type="checkbox"/> UPS Next Day |
| <input type="checkbox"/> FedEx | <input checked="" type="checkbox"/> UPS Ground |
| <input type="checkbox"/> Hand Delivery | <input type="checkbox"/> Courier |

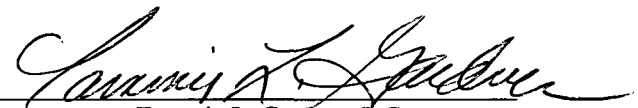
# Copies	Date	Description
2	10/2007	Citrus County Central Landfill – Site Assessment Report

THESE ARE TRANSMITTED AS CHECKED BELOW:

- | | |
|--|---|
| <input type="checkbox"/> For Approval | <input type="checkbox"/> For Your Information |
| <input checked="" type="checkbox"/> For Your Use | <input type="checkbox"/> For Review and Comment |
| <input type="checkbox"/> As Requested | <input type="checkbox"/> For Your File |
| <input type="checkbox"/> For Signature | <input type="checkbox"/> Other: |

REMARKS:

Copies to: Susie Metcalfe, P.G. Citrus Co. Solid Waste Director Signed


Tammie L. Gardner, P.G.

If enclosures are not as noted, kindly notify us at once.

M:\03860-CitrusCounty\028-01 Site Assessment\Correspondence\2007-10-19-XMT-Morris-DEP-SiteAssessmentReport.doc

730 NE Waldo Road • Gainesville, Florida 32641 • 352-377-5821 / FAX 352-377-3166
324 S. Hyde Park Avenue, Suite 250 • Tampa, Florida 33606 • 813-258-0703 / FAX 813-254-6860
1100 Cesery Boulevard • Jacksonville, Florida 32211 • 904-744-5401 / FAX 904-744-6267
3910 S. Washington Avenue • Suite 210 • Titusville, Florida 32796 • 321-269-2950 / FAX 321-269-2951
1685 Lee Road, Suite 250 • Winter Park, Florida 32789 • 407-740-7400 / FAX 407-647-8080

plus 127
file copy
Dept. of Environment
Protection
OCT 22 2007
Southwest District

**CITRUS COUNTY CENTRAL LANDFILL
SITE ASSESSMENT REPORT
IN ACCORDANCE WITH
CHAPTER 62-780.600(8) FAC**

Prepared for:

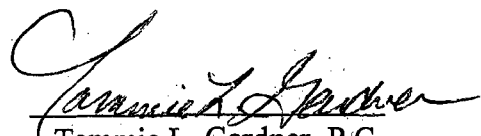
**CITRUS COUNTY BOARD OF
COUNTY COMMISSIONERS**

Prepared by:

JONES EDMUNDS & ASSOCIATES, INC.
730 NE Waldo Road
Gainesville, Florida 32641

P.E. Certificate of Authorization #1841
P.G. Certificate of Authorization #133

October 2007


Tammie L. Gardner, P.G.
Florida P.G. No. 1609
10/19/07

Morris, John R.

From: Morris, John R.
Sent: Friday, March 23, 2007 8:43 AM
To: Susan Metcalfe (E-mail)
Cc: Pelz, Susan; Morgan, Steve; Watson, Stephanie M.
Subject: Citrus Central landfill -- abandonment of monitor wells/gas probes; pending modification # 21375-011

Susie:

Based on our telephone conversation conducted March 15, 2007, this message has been prepared to summarize the proposed abandonment of the following locations:

- Monitor wells -- existing wells MW-C and MW-D
- Gas probes -- all existing gas probes referenced in Specific Condition #F.3. of permit #21375-008-SO, EXCEPT that existing gas probes GS-1E, GS-2E, GS-4E, GS-1W, GS-T6E, GS-N6E and GS-J3E shall be maintained for future monitoring events

The abandonment of these monitor wells and gas probes will be reflected in the changes to Specific Conditions #E.3. and #F.3., respectively, when the amended permit associated with pending modification #21375-011 is issued. As the proposed replacement monitor wells and gas probes approved by the Department have already been installed, no routine ground water or landfill gas monitoring events will be missed. Accordingly, the Department does not object to the abandonment of the above-listed monitor wells and gas probes prior to issuance of permit modification #21375-011.

Please contact me if you have questions about this message.

John

John R. Morris, P.G.
FDEP SW District Office, Solid Waste Section
13051 N. Telecom Pkwy.
Temple Terrace, FL 33637-0926.

Telephone: 813-632-7600, ext. 336; suncom 514-9155, ext. 336
Facsimile: 813-632-7664
E-mail: john.r.morris@dep.state.fl.us



FILE COPY
29059Z

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
JAN - 2 2007
SOUTHWEST DISTRICT
TAMPA

December 28, 2006

Mr. John Morris, P.G.
Florida Department of Environmental Protection – Southwest District
13051 N Telecom Parkway
Temple Terrace, FL 33632-0926

Re: Citrus County Central Class I Landfill
Proposed Site Assessment Activities
FDEP Permit No.: 21375-005-SO/01 & Consent Agreement 05-1078
Jones Edmunds Project No.: 03860-021-01

Dear John:

In accordance with Florida Department of Environmental Protection Permit No. 21375-005-SO/01 and Consent Agreement 05-1078, groundwater monitoring is performed semiannually at the Citrus County Central Landfill.

Data collected during the second semiannual compliance monitoring event of 2006 indicated the presence of Benzene, Methylene Chloride and Vinyl Chloride at concentrations above the Primary Drinking Water Standards in monitoring well MW-10. This well was subsequently re-sampled and all three Constituents of Concern were confirmed at concentrations above their associated drinking water standards. Consequently, site assessment activities will be conducted in accordance with Consent Agreement 05-1078 and Rule 62-780, F.A.C.

Our November 9, 2006 letter proposed activities to be performed to address the requirements of Rule 62-780.600, F.A.C. The proposed activities have been revised based on a discussion with Ms. Stephanie Watson on December 15, 2006. The revised activities are provided below:

1. Install one horizontal assessment monitoring well approximately 150 feet north-northwest of MW-10 as shown in Figure 1 (See Enclosed). This well will be identified as MW-18 and will be constructed with a screened interval at the same approximate elevation as MW-10 (approximately 15 to -5 feet, NGVD).
2. Install one vertical assessment monitoring well in cluster with MW-10 as shown in Figure 1. This well will be identified as MW-19 and will be constructed with a screened interval elevation of approximately -15 to -25 feet, NGVD.

730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352-377.3166 Fax
www.jonesedmunds.com

Mr. John Morris, P.G.

December 28, 2006

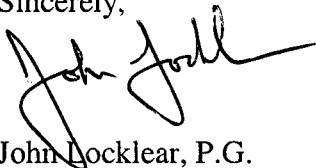
Page 2

3. Develop and sample MW-18 and MW-19. Groundwater samples will also be collected from MW-10 and background well MW-1R. The groundwater samples will be analyzed by EPA Method 8260.
4. Install two piezometers, one east and one west of MW-10 as shown in Figure 1. The piezometers will be identified as PZ-1 and PZ-2. Both piezometers will be constructed with screen interval elevations similar to MW-10.
5. Survey MW-18, MW-19, PZ-1 and PZ-2. All work will be performed by a licensed Professional Land Surveyor.
6. Install pressure transducers in MW-10, MW-18, MW-19, and PZ-2 to collect daily groundwater levels. In conjunction with daily rainfall data recorded on site, the water level data will be used to evaluate the apparent groundwater mounding observed in the vicinity of MW-10. The mounding may be the result of surface water infiltration from the adjacent stormwater retention pond.
7. Perform a well inventory to identify potential public water supply wells located within a half mile of the site and private water supply wells within a quarter mile of the site.
8. Prepare a Site Assessment Report (SAR).

The date of the confirmed exceedance was August 31, 2006. Therefore, the SAR is due no later than May 28, 2007.

We would like to discuss the proposed actions with you prior to implementation. Please call me at your earliest convenience at (352) 377-5821 ext. 5305.

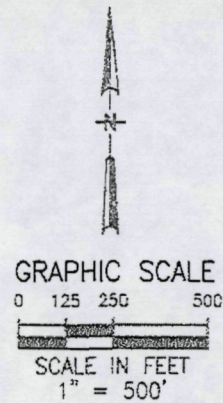
Sincerely,



John Locklear, P.G.
Project Manager

Enclosure: Figure 1 – Proposed Well for SAR

xc: Susan Metcalfe, P.G.
Katherine Weitz

**LEGEND**

- COMPLIANCE WELLS
- WATER LEVEL WELLS
- PROPOSED WELL
- BACKGROUND WELLS
- INTERMEDIATE WELL
- LEACHATE INFLUENT SAMPLING LOCATION
- LEACHATE EFFLUENT SAMPLING LOCATION

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
JAN - 2 2007
SOUTHWEST DISTRICT
TAMPA

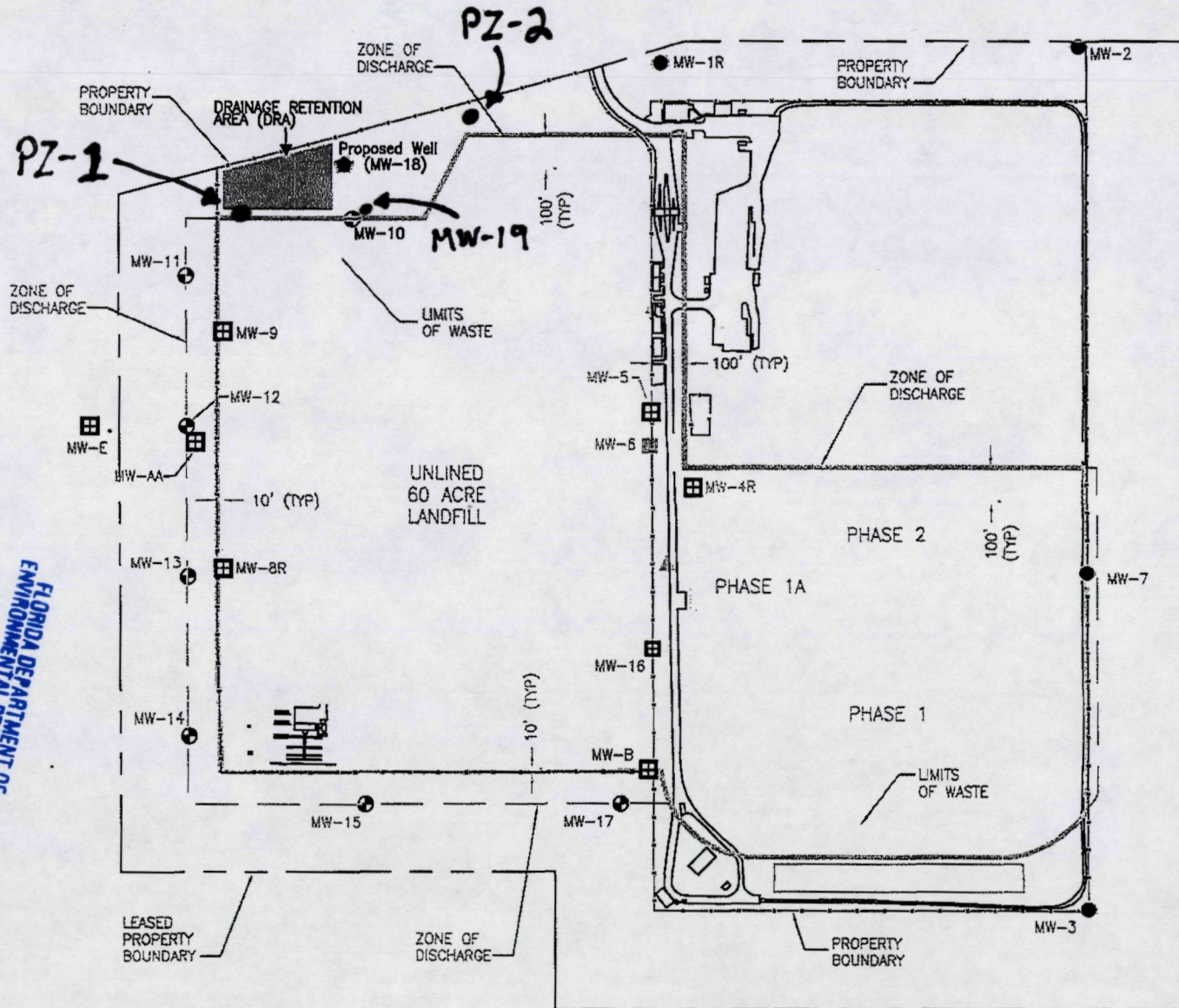


FIGURE 1
PROPOSED WELL FOR SAR
CITRUS COUNTY CENTRAL LANDFILL

Watson, Stephanie M.

From: Morris, John R.
Sent: Monday, November 20, 2006 12:44 PM
To: Susan Metcalfe (E-mail); Allan Biddlecomb (E-mail)
Cc: Pelz, Susan; Watson, Stephanie M.
Subject: FW: 62-777 and best available technology.
Importance: High

Susie and Allan:

This message has been prepared to forward the e-mail message received from Silky Labie regarding the results of recent monitoring events reported for Citrus Central Landfill and is also intended to supplement the Department's letter dated October 26, 2006 regarding the clarification of deadlines and status of compliance with Consent Agreement #05-1078.

The requirements of Paragraph 8 of the referenced Consent Agreement included the completion of an "initial sampling event" at new wells MW-10 through MW-15 and new well MW-17. Review comments were provided in my memorandum dated September 28, 2006 regarding the elevated detection limits reported for the July 2006 sampling event for 8 semi-volatile organics that are listed in 40 CFR Part 258, Appendix II that did not demonstrate compliance with the Department's minimum criteria for ground water. The 8 parameters included: chlorobenzilate; diallate; dimethoate; 2,4-dinitrotoluene; disulfoton; kepone; pentachloronitrobenzene; and, phorate.

Based on Silky Labie's e-mail message the following conclusions are provided:

- The elevated detection limit originally reported for kepone for the November 2005 sampling event is considered to be acceptable due to its highly reactive nature. No additional analyses are requested for kepone.
- The laboratory should be able to meet the Department's minimum criteria for ground water (or PQL if established) for the remaining 7 semi-volatile organics. A supplemental sampling event at wells MW-10 through MW-15 and well MW-17 is requested for analysis of: chlorobenzilate; diallate; dimethoate; 2,4-dinitrotoluene; disulfoton; pentachloronitrobenzene; and, phorate.

Upon receipt of the results of a supplemental sampling event at the referenced wells for the referenced parameters, and upon receipt of revisions to the document entitled "Ground Water Investigation Report" as requested in the comments memorandum dated September 28, 2006, the Department will be able to indicate that the County is in compliance with the requirements of Paragraph 8 of the Consent Agreement.

Please contact me if you have questions about this message.

John

Our new office is located at 13051 N. Telecom Pkwy., Temple Terrace, FL 33637-0926.

John R. Morris, P.G., FDEP SW District Office, Solid Waste Section
 Telephone: 813-632-7600, ext. 336; suncom 514-9155, ext. 336
 Facsimile: 813-632-7664; E-mail: john.r.morris@dep.state.fl.us

-----Original Message-----

From: Labie, Silky
Sent: Monday, October 30, 2006 10:10 AM
To: Morris, John R.
Cc: Mark E. Inman
Subject: RE: 62-777 and best available technology.

11/28/2006

Importance: High

John – in reviewing the information provided by Enco, and also talking with their Quality Assurance Officer, it appears that the laboratory is able to achieve levels that will meet the DEP PQL criteria for 7 of the eight components in question. Kepone is highly reactive, and may require using a different method or a different extraction strategy to achieve a satisfactory PQL, although the laboratory is very close to the stated requirement.

It is my opinion that the laboratory has demonstrated its willingness to meet the Department's criteria and that they have, in good faith, made the effort to satisfy the client and the Department. Since this is an ongoing project, I recommend that the past data be accepted, and that future data (with the new PQLs and technology) should meet our requirements.

Silky

Florida Dept. of Environmental Protection
Environmental Assessment Section
(850) 245 8065
<<mailto:silky.labie@dep.state.fl.us>>

Get automatic updates on QA Activities – subscribe to our eNewsletter at

<http://www.dep.state.fl.us/labs/training/listserve.htm>

Have you subscribed, but haven't gotten any eNewsletter emails? Let me know!!

From: Morris, John R.
Sent: Tuesday, October 17, 2006 3:20 PM
To: Labie, Silky
Subject: RE: 62-777 and best available technology.

Silky:

Results of routine sampling conducted at Citrus Central Landfill indicated ground water quality had been impacted (primarily related to benzene and vinyl chloride). The Department entered into a consent order with Citrus County to address these ground water impacts, as well as the occurrence of landfill gas at elevated concentrations. The ordered section of the consent order required the County to conduct "evaluation monitoring" for an expanded list of parameters, including the parameters listed in 40 CFR Part 258, Appendix II and provide a summary report.

The first sampling event for the expanded list of parameters was conducted 11/16 and 11/17/05. Review comments were provided to the County that indicated 14 of the parameters on the Appendix II list were reported at elevated MDLs that did not demonstrate compliance with either ground water standards or the ground water minimum criteria in Chapter 62-777, F.A.C. The County agreed to add these 14 parameters to the next routine sampling event (conducted on 7/17 & 7/18/06) to provide sufficient data to be able to demonstrate compliance with the ground water standards/minimum criteria for these parameters.

The summary report received on September 15, 2006 indicated that alternate methods were used by ENCO following communications with FDEP Laboratory in Tallahassee (no names provided) for six of the 14 parameters, but that "the reporting limits were not able to be reduced below the MCL" for the remaining 8 parameters. The laboratory report for the July 2006 sampling event did not include results for these 8 parameters (the same 8 parameters listed in the ENCO letter that you forwarded). A summary of the elevated MDLs for these two sampling events is presented on the attached file.

It appears that the other semi-volatile organics included in the Appendix II list were not present at detectable concentrations in these two sampling events. However, to be able to agree that it is appropriate to return to the routine list of ground water parameters (and "release" the County from having to repeat the Appendix II list of parameters), I have been trying to get one

11/28/2006

set of analyses that demonstrated compliance with ground water standards or minimum criteria. Alternately, I have indicated to the County and their consultant that if the Bureau of Labs felt that appropriate analytical methods had been used and that good faith efforts had been made at measuring these 8 parameters at the lowest achievable levels for the applied methods I would be able to "let it go" (consistent with the October 2004 PQL guidance document). In the event that the Bureau of Labs agrees that good faith efforts have been made, I have asked for written confirmation for our file.

That's a lot of background information, but hopefully helpful to you in understanding where we're at on this facility. We're preparing a status letter for the County that describes their compliance with the requirements of the consent order. Right now we're indicating that the objectives of the paragraph regarding the investigation of ground water impacts have not been completed, that is the main consequence.

Your assistance is appreciated. Please contact me if you have questions about this message.

John

Our new office is located at 13051 N. Telecom Pkwy., Temple Terrace, FL 33637-0926.

John R. Morris, P.G., FDEP SW District Office, Solid Waste Section
Telephone: 813-632-7600, ext. 336; suncom 514-9155, ext. 336
Facsimile: 813-632-7664; E-mail: john.r.morris@dep.state.fl.us

-----Original Message-----

From: Labie, Silky

Sent: Tuesday, October 17, 2006 8:18 AM

To: Morris, John R.

Subject: FW: 62-777 and best available technology.

Before I respond – can you give me some background? Since the published PQLs are expected to be reasonably achieved with the stated methodologies, I tend to concur that the previously generated data does not meet the state's expectations and are hence unusable for decisions.

However – what are the consequences of not accepting the data? Is this an ongoing monitoring permit, so that that future analyses can be used or was this a one-time monitoring effort?

Silky

Florida Dept. of Environmental Protection
Environmental Assessment Section
(850) 245 8065
<<mailto:silky.labie@dep.state.fl.us>>

Get automatic updates on QA Activities – subscribe to our eNewsletter at
<http://www.dep.state.fl.us/labs/training/listserve.htm>

Have you subscribed, but haven't gotten any eNewsletter emails? Let me know!!

From: Mark E. Inman, Ph.D. [<mailto:minman@encolabs.com>]
Sent: Monday, October 16, 2006 10:18 AM
To: Labie, Silky
Subject: 62-777 and best available technology.

silky,

11/28/2006

attached letter is sent to try and get some state resolution on some data that has been generated in the past. look forward to discussing this with you.

M.



File copy
290572
Dept. of Environmental
Protection

NOV 13 2006

Southwest District

November 9, 2006

Mr. John Morris, P.G.
Florida Department of Environmental Protection – Southwest District
13051 N Telecom Parkway
Temple Terrace, FL 33632-0926

Re: Citrus County Central Class I Landfill
Proposed Site Assessment Activities
FDEP Permit No. 21375-005-SO/01 & Consent Agreement 05-1078
Jones Edmunds Project No.: 03860-021-01

Dear John:

In accordance with Florida Department of Environmental Protection Permit No. 21375-005-SO/01 and Consent Agreement 05-1078, groundwater monitoring is performed semiannually at the Citrus County Central Landfill.

Data collected during the second semiannual compliance monitoring event of 2006 indicated the presence of Benzene, Methylene Chloride and Vinyl Chloride at concentrations above the Primary Drinking Water Standards in monitoring well MW-10. This well was subsequently re-sampled. Benzene and Methylene Chloride were not confirmed by the re-sample, however, Vinyl Chloride was confirmed at a concentration of 5 ug/L (above the PDWS of 1 ug/L). Consequently, site assessment activities will be conducted in accordance with Consent Agreement 05-1078 and Rule 62-780, F.A.C.

The following activities are proposed to be performed to address the requirements of Rule 62-780.600, F.A.C.:

1. Install one assessment monitoring well approximately 150 feet north-northwest of MW-10 as shown in Figure 1 (See Enclosed). This well will be identified as MW-18 and will be constructed with a screened interval at the same approximate elevation as MW-10.
2. Develop and sample MW-18. On the same day, groundwater samples will also be collected from MW-10 and background well MW-1R. The groundwater samples will be analyzed by EPA Method 8260.

730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352.377.3166 Fax
www.jonesedmunds.com

Mr. John Morris, P.G.

Florida Department of Environmental Protection – Southwest District

November 9, 2006


Page 2

3. Survey MW-18. All work will be performed by a licensed Professional Land Surveyor.
4. Install pressure transducers in MW-10, MW-18, and MW-1R to collect daily groundwater levels. In conjunction with daily rainfall data recorded on site, the water level data will be used to evaluate the apparent groundwater mounding observed in the vicinity of MW-10. The mounding may be the result of surface water infiltration from the adjacent stormwater retention pond.
5. Perform a well inventory to identify potential public water supply wells located within a half mile of the site and private water supply wells within a quarter mile of the site.
6. Prepare a Site Assessment Report (SAR).

The date of the confirmed exceedance was August 31, 2006. Therefore, the SAR is due no later than May 28, 2007.

We would like to discuss the proposed actions with you prior to implementation. Please call me at your earliest convenience at (352) 377-5821 ext. 5305.

Sincerely,



John Locklear
Project Manager

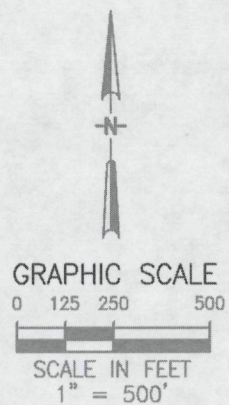
Enclosure: Figure 1 – Proposed Well for SAR

xc: Susan Metcalfe, P.G.
Katherine Weitz

Dept. of Environmental
Protection

NOV 13 2006

Southwest District



LEGEND

- COMPLIANCE WELLS
- WATER LEVEL WELLS
- PROPOSED WELL
- BACKGROUND WELLS
- INTERMEDIATE WELL
- LEACHATE INFLUENT SAMPLING LOCATION
- LEACHATE EFFLUENT SAMPLING LOCATION

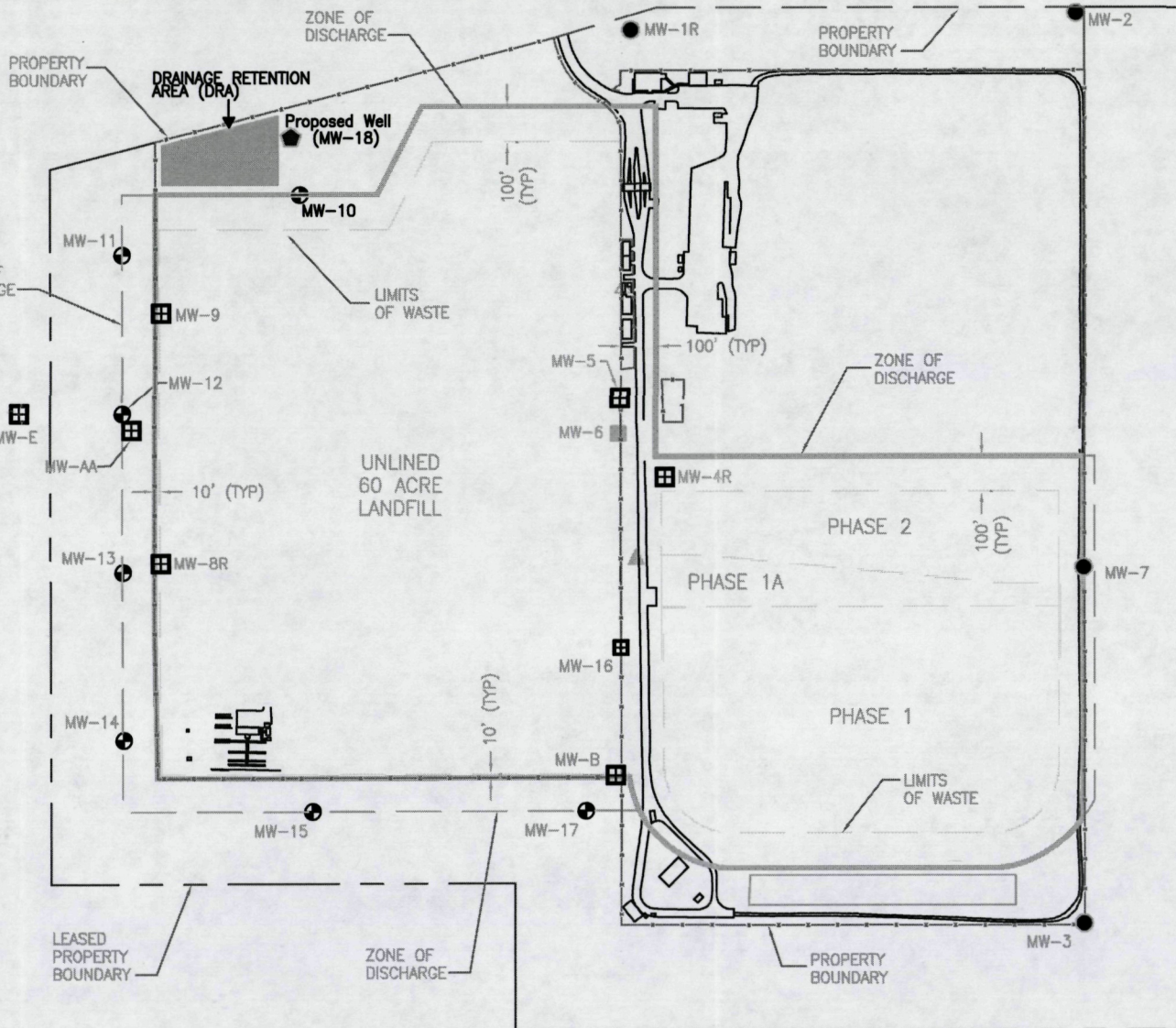


FIGURE 1
PROPOSED WELL FOR SAR
CITRUS COUNTY CENTRAL LANDFILL

Memorandum

Florida Department of
Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

To:

[Signature]



J.M. Farley, Interim District Director

FROM/THROUGH:

10/25/06

[Signature]



William Kutash, Waste Program Administrator

10/25/06



Susan Pelz, P.E., Program Supervisor

10/25/06



Stephanie Watson, Enforcement Coordinator

DATE: October 17, 2006

FILE NAME: CITRUS COUNTY BOARD OF COUNTY
COMMISSIONERS/CITRUS COUNTY
CENTRAL CLASS I LANDFILL

OGC FILE NO. 05-1078

PROGRAM: SOLID WASTE/WASTE MANAGEMENT

COUNTY: CITRUS

TYPE OF DOCUMENT:

☐ DRAFT OR ☐ FINAL
☐ FINAL ORDER
☐ WARNING LETTER

☐ NOV

☐ CONSENT ORDER

☒ STATUS OF COMPLIANCE LETTER

☐ INSPECTION REPORT

Action Required: "Status of Compliance with Consent Agreement" letter for your review.

Note: The Consent Agreement was executed in September 2005. This letter provides the Department's understanding of the County's compliance with the Consent Agreement.

Description of Violations: Exceedances of ground water standards and exceedances of the landfill gas criteria at or beyond the landfill property boundary.

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Chairman Gary Bartell
Citrus County
Board of County Commissioners
New Citrus County Courthouse
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Inverness FL 34450

PS Form 3800, J

See Reverse for Instructions

SENDER: Consent Agent OBC Case #05-1078

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

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3. Article Addressed to:

4a. Article Number

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Chairman Gary Bartell
Citrus County
Board of County Commissioners
New Citrus County Courthouse
110 No. Apopka Avenue, #251
Inverness FL 34450

4b. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

10/30/06

5. Received By: (Print Name)

PAUL WELTON

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Addressee or Agent)

X Paul Welton

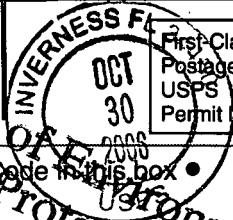
PS Form 3811, December 1994

Domestic Return Receipt

Letter: Clarification of Deadlines and Status on Compliance

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Florida Department of Environmental Protection
Southwest District
c/o Stephanie Watson Solid Waste
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

NOV 01 2006
Southwest District

336370926 R075





Jeb Bush
Governor

Department of Environmental Protection

290 592

Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

October 26, 2006

CERTIFIED MAIL 7004 1350 0002 5571 4329
RETURN RECEIPT REQUESTED

Chairman Gary Bartell
Citrus County Board of County Commissioners
110 North Apopka Avenue
Inverness, FL 34450

RE: Clarification of Deadlines and Status of Compliance
Consent Agreement OGC Case #05-1078
Citrus County Central Class I Landfill and the Closed Class I Landfill
Citrus County

Dear Chairman Bartell:

This letter has been prepared to provide the Department's summary of the Citrus County Board of County Commissioner's (the County's) compliance with the Consent Agreement No. 05-1078, which was executed on September 20, 2005, and to clarify upcoming deadlines, as summarized below.

Paragraph 6 states "The approved "Groundwater Investigation Plan" shall be incorporated herein and made a part of this Consent Agreement, as Exhibit A, and the Respondent shall implement the proposals in the Groundwater Investigation Plan pursuant to the approved schedule."

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because site assessment activities in accordance with Rule 62-780.600, F.A.C. and as per Section 5 of the Groundwater Investigation Plan, are required, and have not yet been completed.

Paragraph 7 states "The approved 'Landfill Gas Compliance Action Plan' shall be incorporated herein and made a part of this Consent Agreement, as Exhibit B, and the Respondent shall implement the proposals in the Landfill Gas Compliance Action Plan pursuant to the approved schedule."

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Agreement requirement. **No further action is required.**

Paragraph 8 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall install and develop ground water monitoring wells MW-10 through MW-15 and MW-17 within 100 feet of the edge of waste disposal cells, conduct an "initial sampling event" at these wells, and submit a summary report of the initial sampling event results to the Department with recommendations regarding the need to conduct further assessment activities, as summarized in Exhibit A."

"More Protection, Less Process"

Printed on recycled paper.

Information Received:

- Document entitled "Citrus County Central Landfill, Ground Water Investigation Report" (GWIR), prepared by Jones Edmunds & Associates, Inc. (JEA), dated January 2006, received January 4, 2006;
- Letter regarding "Supplemental Information and Resampling Data for MW-15, Citrus County Central Landfill Ground Water Investigation," prepared by JEA, dated February 3, 2006, received February 6, 2006;
- Letter regarding "Additional Ground Water Investigation Results, Citrus County Central Landfill," prepared by JEA, dated February 15, 2006, received February 16, 2006; and,
- Letter regarding "Ground Water Sampling Status, Citrus County Central Class I Landfill," prepared by JEA, dated April 21, 2006, received April 24, 2006.

Department Action:

- In its May 24, 2006 letter, the Department requested revisions to the GWIR by September 15, 2006.

Information Received:

- Document entitled "Citrus County Central Landfill Groundwater Investigation Report – Response to FDEP Request for Additional Information," prepared by JEA, dated September 2006, received September 15, 2006;

Department Action:

- The Department has reviewed the September 15, 2006 JEA submittal and has provided comments in the attached memorandum by John Morris.

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time**.

Further Action:

- Please provide a response to review comment #1 in the attached memorandum dated September 28, 2006 within 30 days of receipt of this letter.

Paragraph 9 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall install new landfill gas monitoring probes GP-1 through GP-18, submit a to-scale construction drawing of the new gas monitoring probes, and submit gas monitoring data results to the Department, as summarized in Exhibit B. Existing gas monitoring probes shall not be abandoned until the lease expansion agreement referenced in Paragraph 10 is submitted to the Department and the permit modification referenced in Paragraph 11.a. is issued."

Information Received:

- Document entitled "Landfill Gas Monitoring Probes Installation Construction Certification Report, Citrus County Central Landfill," prepared by SCS Engineers (SCS), dated January 3, 2006, received January 3, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 1st Quarter 2006, prepared by SCS, dated March 17, 2006, received March 22, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 2nd Quarter 2006, prepared by SCS, dated July 3, 2006, received July 7, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 3rd Quarter 2006, prepared by SCS, dated September 26, 2006, received September 29, 2006;

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because a portion of Paragraph 9 is contingent upon the permit modification (referenced in Paragraph 11.a.), for which an application has not yet been submitted.

Paragraph 10 states "Within 90 days of the effective date of the Consent Agreement, the Respondent shall obtain a lease expansion agreement from the Division of Forestry/State Lands and submit a copy of this lease agreement to the Department. If the lease expansion agreement is not obtained within 90 days of the effective date of the Consent Agreement, the Department reserves the right to grant an extension of 30 days to Respondent to obtain such lease expansion agreement if an extension is warranted. If the Department grants a 30-day extension, then such 30-day extension shall automatically apply to Ordered Sections Paragraphs 11.a., 11.b., 11.c., 12.a. and 12.b."

Department Action:

- The Department granted, in its April 4, 2006 letter to the County, an extension until September 1, 2006 to comply with this paragraph.

Information Received:

- Document entitled "Amendment Number One to Sublease Number 3316-05," which was executed on August 30, 2006 between Citrus County and the Florida Department of Agriculture and Consumer Services, received on September 22, 2006.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Agreement requirement. **No further action is required.**

Paragraph 11.a. states "Within 120 days of the effective date of the Consent Agreement, Respondent shall submit an application for a permit modification to the Department that addresses changes in the facility's boundaries, zone of discharge (ZOD), monitoring well network, routine ground water sampling frequency, and landfill gas monitoring system."

Department Action:

- The Department granted, in its April 4, 2006 letter to the County, an extension until September 1, 2006 to comply with this paragraph.

Compliance Deadline:

- The County shall submit an application for the permit modification referenced above within 120 days of September 1, 2006, or by **December 30, 2006.**

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because the application for the permit modification has not yet been submitted.

Paragraph 11.b. states "If exceedances of ground water standards (primary drinking water standards listed in Rule 62-550.310, F.A.C.) or minimum criteria as specified in Chapter 62-520, F.A.C., are reported in the initial sampling event results referenced in Paragraph 8, then within 150 days of the effective date of the Consent Agreement, the Respondent shall commence site assessment activities at the affected new wells (MW-10 through MW-15 and MW-17) at the new ZOD in accordance with Chapter 62-780, F.A.C. The Respondent shall conduct site assessment activities and submit a Site Assessment Report in accordance with the requirements of Rule 62-780.600, F.A.C., as summarized in Exhibit A."

Information Received:

- Document entitled "Citrus County Central Landfill Groundwater Investigation Report – Response to FDEP Request for Additional Information," prepared by JEA, dated September 2006, received September 15, 2006;

Department Action:

- The above document indicates that monitoring well MW-10 demonstrated exceedances of the ground water standard of 1 ug/L for vinyl chloride. The July 2006 sampling result was 5 ug/L and the August 2006 resampling result was 2 ug/L. The Department has determined that site assessment activities at the affected well MW-10 are needed.

Further Action:

- Site assessment activities at the affected well MW-10 shall commence within 150 days of September 1, 2006, or by **January 29, 2007**.
- A Site Assessment Report shall be submitted to the Department within 270 days of September 1, 2006, or by **October 26, 2007**.
- Please note that if exceedances of ground water standards or minimum criteria are reported in future sampling event results for assessment wells MW-11 through MW-15 and MW-17, then the additional affected wells shall be included in site assessment activities.

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because site assessment activities have not been completed in accordance with the requirements of Rule 62-780.600, F.A.C.

Paragraph 11.c., 11.d., and 11.e. states "If exceedances of Rule 62-701.530(1)(a), F.A.C., are reported in the gas monitoring data results referenced in Paragraph 9, then within 150 days of the effective date of the Consent Agreement, the Respondent shall complete installation of passive gas vents, as described in "Phase 2" of the approved Landfill Gas ("LFG") Compliance Action Plan, at the new property boundary,..."

Information Received:

- Document entitled "Landfill Gas Monitoring Results," for 1st Quarter 2006, prepared by SCS, dated March 17, 2006, received March 22, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 2nd Quarter 2006, prepared by SCS, dated July 3, 2006, received July 7, 2006;
- Document entitled "Landfill Gas Monitoring Results," for 3rd Quarter 2006, prepared by SCS, dated September 26, 2006, received September 29, 2006;

Department Action:

- A Department review of the above-mentioned reports indicates that there were no exceedances of Rule 62-701.530(1)(a), F.A.C reported for gas monitoring probes GP-1 through GP-18.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order requirement. **No further action is required.**

Paragraph 12 states "If the lease expansion agreement referenced in Paragraph 10 is not obtained and submitted to the Department within 90 days of the effective date of this Consent Agreement, or in accordance with an extension granted by the Department..."

Compliance Status:

- This paragraph is not applicable because the lease expansion agreement was obtained. The facility is considered to be **in compliance** with this Consent Order requirement. **No further action is required.**

Paragraph 13 states "Upon review of the submittals required by this Consent Agreement, the Department may request additional information. All additional information shall be submitted to the Department within 30 days of receipt of the Department's written request."

Compliance Status:

- Compliance with this Consent Agreement requirement is **pending at this time** because the Department has requested additional information within 30 days (see 'Further Action' under Paragraph 8).

Paragraph 14 requires the payment of \$3,000 in costs and expenses incurred by the Department during investigation of this matter, within 30 days of the effective date of the Consent Agreement.

Information Received:

- This payment was due to the Department on October 20, 2005. The Department received a check for \$3,000 from the County on August 15, 2005.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order paragraph. **No further action is required.**

Paragraph 15 states "Respondent agrees to pay the Department stipulated penalties in the amount of \$100 per day for each and every day Respondent fails to timely comply with any of the requirements of paragraphs 6-14 of this Consent Agreement..."

Department Action:

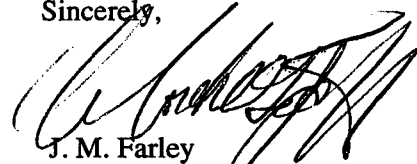
- No stipulated penalties have been assessed to date.

Compliance Status:

- The facility is considered to be **in compliance** with this Consent Order paragraph at this time.

If you have any questions, please feel free to contact me at (813) 632-7600 x 339, Susan Pelz, P.E., Solid Waste Program Manager, at (813) 632-7600 x 386, or Stephanie Watson at (813) 632-7600 x 451.

Sincerely,



J. M. Farley
Interim District Director
Southwest District

jmf/sw

Attachments: 1) September 28, 2006 Memorandum by John Morris "Review Comments Regarding 'Ground Water Investigation Report'
2) Excel Spreadsheet: Summary of Inadequate Results for the July 17/18, 2006 Sampling Event
cc: William Kutash, Waste Program Administrator, FDEP SWD
Susan Pelz, P.E., FDEP SWD
Steve Morgan, FDEP SWD
Stephanie Watson, FDEP SWD
John Morris, FDEP SWD
Glenn McCracken, Citrus County Public Works Director
Thomas H. Dick, Assistant Co. Administrator
Susan Metcalfe, Citrus County Solid Waste Management Division Director

Memorandum

Florida Department of Environmental Protection

TO: Stephanie Watson
FROM: John R. Morris, P.G.
DATE: September 28, 2006
SUBJECT: Citrus County Central Landfill
OGC Case No. 05-1078
Review Comments Regarding "Ground Water Investigation Report"
cc: Susan Pelz, P.E.

I have reviewed the document entitled "Citrus County Central Landfill, Ground Water Investigation Report, Response to FDEP Request for Additional Information," prepared by Jones Edmunds & Associates, Inc., (JEA), dated September 2006, received September 15, 2006. The document included the following:

- Responses to Comments, dated September 15, 2006; and,
- Attachment 1 – Document entitled "Citrus County Central Landfill, Ground Water Investigation Report" (GWIR), dated September 2006, signed/sealed September 15, 2006.

The review comment numbers referenced below are consistent with my memorandum dated May 10, 2006. As sufficient responses were provided to comment #2 through #12, no additional information is requested for these items. As comment #13 and #14 were informational comments that did not request responses, no additional information is requested for these items.

Please have the Respondent submit additional revisions to the GWIR to address review comment #1, below, using a ~~strike through~~ and underline format, or similar format, to facilitate review. Please also have the applicant include the revision date as part of the header/footer for all revised or replacement pages (text, figures, tables and appendices).

Section 2.3 – Ground Water Sampling

1. The response letter indicated that ground water samples were collected from wells MW-10 through MW-15 and well MW-17 during July 2006, included the analysis of six selected semi-volatile organics listed in 40 CFR Part 258, Appendix II. The selected semi-volatile organics were analyzed using alternate analytical methods (as compared to the November 2005 sampling event) to demonstrate compliance with ground water standards or minimum criteria as summarized on the attached table. The response letter indicated that these alternate analytical methods were selected after communicating with personnel in the Bureau of Laboratories. In addition, the response letter indicated that reporting limits were not able to be met for eight other semi-volatile organics (see attached table). Please have the Respondent provide an acknowledgement from the Bureau of Laboratories that appropriate analytical methods were selected for the November 2005 sampling event and that good faith efforts have been made to by the laboratory to measure these eight semi-volatile organics at the lowest achievable levels for the applied method. In the event that alternate analytical methods are recommended by the Bureau of Laboratories, supplemental analyses of samples collected from wells MW-10 through MW-15 and well MW-17 shall be required to demonstrate compliance with the Department's minimum criteria for these eight semi-volatile organics. Please have the Respondent submit revisions this section of the GWIR to reference the results of any supplemental sampling and analyses, as appropriate.

I can be contacted at (813) 632-7600, extension 336, to discuss these review comments.

Attachment – Summary of Inadequate Results for the July 17/18, 2006 Sampling Event
jrm

SUMMARY OF INADEQUATE RESULTS FOR THE JULY 17/18, 2006 SAMPLING EVENT

Facility Name -- Citrus Central Landfill
Analytical Laboratory -- ENCO Laboratories

County -- Citrus
Date Sampled -- 7/17 & 7/18/06

Date Received -- 9/15/06

PARAMETERS	Ground Water Criteria	Criteria Type	Monitor Well Identification Number							Notes (as needed)
			MW-10 A/F	MW-11 A/F	MW-12 AF	MW-13 AF	MW-14 AF	MW-15 AF	MW-17 AF	
SEMI-VOLATILE ORGANICS										
Benzo(a) anthracene	0.05	MC	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04	PQL @ 0.2 µg/L
Benzo(b) fluoranthene	0.05	MC	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	PQL @ 0.1 µg/L
Benzo(k) fluoranthene	0.5	MC	<0.06	<0.06	<0.06	<0.06	<0.06	<0.06	<0.06	
Benzo(a) pyrene	0.2	1° GWS	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	
Chlorobenzilate	0.1	MC	NA	NA	NA	NA	NA	NA	NA	Not analyzed; PQL @0.8 µg/L
Diallate	0.6	MC	NA	NA	NA	NA	NA	NA	NA	Not analyzed
Dibenzo(a,h) anthracene	0.005	MC	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	PQL @ 0.2 µg/L
Dimethoate	1.4	MC	NA	NA	NA	NA	NA	NA	NA	Not analyzed
2,4-dinitrotoluene	0.05	MC	NA	NA	NA	NA	NA	NA	NA	Not analyzed; reported; PQL @ 0.2 µg/L
Disulfoton	0.3	MC	NA	NA	NA	NA	NA	NA	NA	Not analyzed; PQL @ 0.4 µg/L
Indeno(1,2,3-cd) pyrene	0.05	MC	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	PQL @ 0.2 µg/L
Kepone	0.004	MC	NA	NA	NA	NA	NA	NA	NA	Not analyzed; PQL @ 6 µg/L
Pentachloronitrobenzene	0.1	MC	NA	NA	NA	NA	NA	NA	NA	Not analyzed; PQL @ 0.3 µg/L
Phorate	1.4	MC	NA	NA	NA	NA	NA	NA	NA	Not analyzed

1° GWS = primary ground water standard

Units reported in µg/L

MC = minimum criteria (Chapter 62-777, F.A.C., Table I)

NA = not analyzed

PQL = practical quantitation limits presented in Table C of DEP document "Guidance for the Selection of Analytical Methods and for the Evaluation of Practical Quantitation Limits" dated October 12, 2004; this document can be accessed at the following link: ftp://ftp.dep.state.fl.us/pub/labs/assessment/library/docs/62_777final.pdf.

Unless a PQL value is presented in the Notes column, the analytical laboratory must report MDL at or below the ground water standard or minimum criterion to demonstrate compliance for that parameter

Watson, Stephanie M.

From: Watson, Stephanie M.
Sent: Tuesday, October 17, 2006 11:02 AM
To: 'Susan Metcalfe'
Cc: Pelz, Susan; Morris, John R.
Subject: RE: consent timetable letter

Hi Susie,

The letter has been drafted, but it is still in the review process, so it has not been sent yet.

The letter will be a "status of compliance" letter, which lists each Consent Agreement item under paragraphs 6 through 15, and the Department's understanding of the County's status of compliance with each item. It is a fairly comprehensive letter, and will be several pages long.

If you have any other questions, please let me know.

Stephanie

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, October 16, 2006 9:37 AM
To: Watson, Stephanie M.
Subject: consent timetable letter

Stephanie,
I haven't seen your letter yet. Has it been sent?
Susie

Watson, Stephanie M.

From: Pelz, Susan
Sent: Monday, October 09, 2006 10:32 AM
To: Morris, John R.; Watson, Stephanie M.
Subject: FW: Gas Monitoring

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Friday, October 06, 2006 1:02 PM
To: Pelz, Susan
Cc: Glenn McCracken; JBanks@SCSEngineers.com
Subject: Gas Monitoring

Susan,

This is to report that the quarterly gas sampling event was performed at the Citrus County Central Landfill on October 4. Methane concentration in one probe (GS-2E) was in excess of 5% at the property boundary. That location is on the east side of the active landfill.

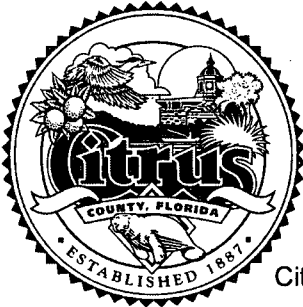
The sublease recently granted to the County moves the monitoring boundary approximately 300 feet away from this point. Therefore, we are reporting this as a courtesy rather than as an exceedence.

Please let me know if you have any questions or need additional information.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax

**Board of County Commissioners****DEPARTMENT OF PUBLIC WORKS****SOLID WASTE MANAGEMENT DIVISION**

P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Ingles/Yankeetown area Toll Free (352) 489-2120

September 19, 2006

Susan J. Pelz, P.E.
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Dept. of Environmental
Protection
SEP 22 2006
Southwest District

Re: Citrus County Central Landfill
Consent Agreement OGC File No. 05-1078
Lease expansion, Permit modification & Site assessment activities.

Dear Ms. Pelz:

The attached document is a certified copy of the amendment to the sublease held by Citrus County with the Division of Forestry. This document was executed by the Division of Forestry and Division of State Lands on August 30, 2006, thus meeting the deadline of September 1 for the County's compliance with Paragraph 10 of the referenced Consent Agreement, as extended. The expanded area of the sublease is described in Exhibit "A".

The report submitted by JEA in compliance with Paragraph 8 of the Consent Agreement was deemed incomplete by the Department. The supplemental report was submitted to your office on September 15, according to the timetable therefore.

According to Paragraph 11a of the Consent Agreement, Jones, Edmunds & Associates is preparing the application for a permit modification to incorporate the change in compliance boundaries, zone of discharge, monitoring well network, and gas monitoring system. This will be provided to your office prior to the end of September.

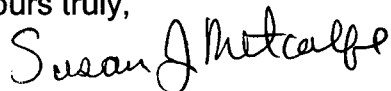
Paragraph 11b requires that if exceedences of groundwater standards are discovered in the new wells, a site assessment will be initiated. Jones, Edmunds & Associates is preparing a plan for that activity, in accordance with Chapter 62-780 F.A.C., which will be submitted to your office prior to the end of October. Installation of additional wells will commence promptly upon approval of the plan by the Department.

No exceedences have been detected in the new probes in the gas monitoring system; therefore no additional action is anticipated.

Susan Pelz
September 19, 2006
Page 2

Please contact me if you have questions or require additional information.

Yours truly,

A handwritten signature in cursive script that reads "Susan J. Metcalfe".

Susan Metcalfe, P.G.
Director

SM

Attachment

CC: Glenn W. McCracken, Director, Public Works Department
John Banks, SCS Engineers, Tampa
John Locklear, JEA, Gainesville
Keith Mousel, Forestry, Brooksville

003289

ATL2

STATE OF FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES,
DIVISION OF FORESTRY

AMENDMENT NUMBER ONE TO SUBLEASE NUMBER 3316-05

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
SEP 22 2006
SOUTHWEST DISTRICT
TAMPA

THIS SUBLEASE AMENDMENT is entered into this 30th day of
August, 2006, by and between the STATE OF FLORIDA DEPARTMENT OF
AGRICULTURE AND CONSUMER SERVICES, DIVISION OF FORESTRY, hereinafter referred
to as "SUBLESSOR" and CITRUS COUNTY, FLORIDA, hereinafter referred to as
"SUBLESSEE";

W I T N E S S E T H

WHEREAS, the Board of Trustees of the Internal Improvement Trust Fund of
the State of Florida, by virtue of Section 253.03, Florida Statutes, holds
title to certain lands and property for the use and benefit of the State of
Florida; and

WHEREAS, on April 22, 1996, SUBLESSOR and SUBLESSEE entered into
Sublease Number 3316-05; and

WHEREAS, SUBLESSOR and SUBLESSEE desire to amend the Sublease to include
additional lands listed in Exhibit "A" for use by SUBLESSEE to construct and
maintain monitoring wells.

NOW THEREFORE, in consideration of the mutual covenants and agreements
contained herein, the parties hereto agree as follows:

1. The sublease agreement is hereby amended to add land described in
Exhibit "A" to expand an existing well monitoring area within which SUBLESSEE
may construct and maintain monitoring wells. As consideration for this land
being added to this sublease, SUBLESSEE agrees to perform those obligations
contained in Exhibit "B". The lands described in Exhibit "B" are for well
monitoring purposes only and are not for any landfill expansion.
2. It is understood and agreed by SUBLESSOR and SUBLESSEE that in each and
every respect the terms of the Sublease Number 3316-05 except as amended shall
remain unchanged and in full force and effect and the same are hereby
ratified, approved and confirmed by SUBLESSOR and SUBLESSEE.

CERTIFIED TO BE A TRUE COPY
BETTY STRIFLER
CLERK OF THE CIRCUIT COURT

BY Theresa Steyer D.C.
THIS 18 DAY OF Sept A.D. 2006



IN WITNESS WHEREOF, the parties have caused this sublease agreement to be executed on the day and year first above written.

Chander D. Baker
Witness
Chander D. Baker
Print/Type Witness Name

Suse P. Burch
Witness
Suse P. Burch
Print/Type Witness Name

STATE OF FLORIDA
COUNTY OF LEON

The foregoing instrument was acknowledged before me this 28th day of August 2006, by Mike Gresham, as Director of Administration, on behalf of the STATE OF FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES, DIVISION OF FORESTRY. (He/She is personally known to me or has produced _____ as identification.

STATE OF FLORIDA DEPARTMENT OF
AGRICULTURE AND CONSUMER SERVICES,
DIVISION OF FORESTRY

By: Mike Gresham (SEAL)

Mike Gresham
Print/Type Name

Title: Director of Administration

"SUBLESSOR"

Karen A. Meyer
Notary Public, State of Florida

KAREN A. MEYER
Print/Type Notary Name



Commission Number: #DD 346679

Commission Expires: 10/20/2008

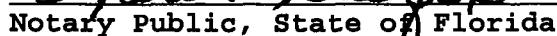
By: John Barlett (SEAL)

Title: Chairman

(OFFICIAL SEAL)

"SUBLESSEE"

The foregoing instrument was acknowledged before me this 8
day of August, 2006 by Gary Bartell, and
 as Chairman, and
 , respectively, on behalf of the Board of County
Commissioners or Citrus County, Florida. They are personally known to
me ~~or produced~~ as identification.



Print/Type Notary Name

Commission Number:

Commission Expires:

Consented to by the TRUSTEES on 30th day of August 2006

Gloria C. Nelson
GLORIA C. NELSON, OPERATIONS AND
MANAGEMENT CONSULTANT MANAGER,
BUREAU OF PUBLIC LAND
ADMINISTRATION, DIVISION OF STATE
LANDS, DEPARTMENT OF ENVIRONMENTAL
PROTECTION

Approved as to Form and Legality

By: [Signature]
DEP Attorney

EXHIBIT "A"
Legal Description of the Subleased Premises

Legal Description:

A portion of Sections 1 and 12, Township 19 South, Range 18 East, and Section 6, Township 19 South, Range 19 East, Citrus County, Florida, more particularly described as follows:

Begin at the northeast corner of the southeast quarter of Section 1, Township 19 south, Range 18 East, Citrus County, Florida; thence south $89^{\circ} 43' 25''$ east along an easterly extension of the north boundary of the southeast quarter of said Section 1, a distance of 285.89 feet; thence south $00^{\circ} 16' 35''$ west, a distance of 2,930.05 feet; thence north $89^{\circ} 43' 25''$ west parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,925.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 421.83 feet; thence north $89^{\circ} 43' 25''$ west parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,320.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 2,030.38 feet to a point of intersection with the southerly right-of-way line of State Road Number 44, said point being 150.00 feet from, when measured at right angles to the centerline of said State Road Number 44; thence north $75^{\circ} 41' 50''$ east along said southerly right-of-way line, a distance of 309.98 feet; thence departing said southerly right-of-way line south $00^{\circ} 16' 35''$ west, a distance of 1,808.41 feet; thence south $89^{\circ} 43' 25''$ east parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,320.00 feet; thence south $00^{\circ} 16' 35''$ west, a distance of 421.83 feet; thence south $89^{\circ} 43' 25''$ east parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,325.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 2,630.05 feet to a point of intersection with the north boundary of the southeast quarter of said Section 1; thence south $89^{\circ} 43' 25''$ east along the north boundary of the southeast quarter of said Section 1, a distance of 14.11 feet to the point of beginning.

Said parcel containing 55.55 acres, more or less.

EXHIBIT "B"

1. SUBLESSEE shall donate the following described lands, consisting of approximately 33 acres, to the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida ("Board of Trustees"):

a. West ½ of Tract 21, Homosassa Company's Subdivision of Section 33, Township 19 South, Range 17 East, according to map or plant thereof, as recorded in Plat 1, Page 4, of the public records of Citrus County, Florida. Containing 5.05 acres more or less.

b. A portion of the Northeast quarter of Section 14, Township 20 South, Range 19 East, Citrus County, Florida; more particularly described as follows: Begin at the northeast corner of Section 14, Township 20 South, Range 19 East, Citrus County, Florida; thence south 89 42'37" west along the north line of the northeast ¼ of said Section 14, a distance of 389.96 feet; thence departing said north line south 00 03' 44" West a distance of 1,060.00 feet, thence south 89 42' 37" west, a distance of 917.00 feet to a point of intersection with the west line of the east ½ of the northeast ¼ of said Section 14; thence south 00 03' 44" west along said west line, a distance of 182.59 feet; thence departing said west line north 89 42'37" east, a distance of 1309.26 feet to a point of intersection with the east line of the northeast ¼ of said Section 14; thence north 00 02'37" west along said east line, a distance of 1242.60 feet to the point of beginning. Containing 15.0 acres more or less.

c. Lots 1-6, Block 153, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,260 square feet more or less.

Lots 7-12, Block 153, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,426 square feet more or less.

Lots 1-6, Block 154, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,348 square feet more or less.

Lots 7-12, Block 154, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,434 square feet more or less.

Lots 7-12, Block 155, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,364 square feet more or less.

Lots 1-6, Block 156, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,342 square feet more or less.

Lots 8-12, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 65,274 square feet more or less.

Lot 6, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 13,058 square feet more or less.

Lot 1, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 13,058 square feet more or less.

The total of the properties described in c. above, are all located within Section 32, Township 19 South, Range 17 East, Citrus County Florida, containing 12.89 acres more or less.

SUBLESSEE shall comply with all Board of Trustees' requirements for donations of real property and pay all costs associated with this donation.

2. SUBLESSEE shall purchase and donate to Withlacoochee Forestry Center \$36,000 worth of herbicides for use in the eradication of invasive exotics on Withlacoochee State Forest over a consecutive three year period (\$12,000 per fiscal year beginning in 2006-07 fiscal year).

3. SUBLESSEE shall purchase and donate to Withlacoochee Forestry Center \$75,000 worth of road stabilization material for use on roads within Withlacoochee State Forest over a consecutive three year period (\$25,000 per fiscal year beginning in 2006-07 fiscal year).

Watson, Stephanie M.

From: Morris, John R.
Sent: Wednesday, September 27, 2006 6:35 PM
To: Allan Biddlecomb (E-mail); Susan Metcalfe (E-mail)
Cc: Pelz, Susan; Watson, Stephanie M.
Subject: Citrus Central LF -- minor mod. for gw/gas monitoring

Importance: High

Allan and Susie:

I've prepared this message to follow up our telephone conversation today regarding the permit modification that you are preparing. I had the opportunity to discuss the issues we spoke about with Susan and Stephanie and can give these updates:

- No objection to only submitting the portions of the application form that are being revised as part of the permit modification (Parts A, B, M, O and T)
- No objection to referencing the previously submitted documents for gw and gas monitoring (the Consent Agreement attachments), but please be specific about the dates of these documents when referencing them in the modification application; for example, the gas monitoring probe locations are included in the SCS letter dated July 8, 2005; please also be specific about what parts of the permit renewal documentation is being replaced
- I physically located the original submittals for gw and gas monitoring that were attached to the Consent Agreement; both submittals are signed and sealed so you can reference these previously submitted documents
- A new drawing that shows the new property boundary to be consistent with the revised legal description of the combined footprint does need to be submitted; the drawing will need to be signed/sealed by a PLS

You do NOT need to submit the minor modification application by 10/1/06. Susan and I would like to talk with you about gw monitoring issues (Chapter 62-780, F.A.C. assessment, abandonment of the existing wells, and routine monitoring/reporting) before you submit the modification application. As Thursday and Friday of this week are overbooked already and I'm out on Monday next week, could we call next Tuesday afternoon (10/3) to discuss?

Your assistance is appreciated.

John

Our new office is located at 13051 N. Telecom Pkwy., Temple Terrace, FL 33637-0926.

John R. Morris, P.G., FDEP SW District Office, Solid Waste Section
Telephone: 813-632-7600, ext. 336; suncom 514-9155, ext. 336
Facsimile: 813-632-7664; E-mail: john.r.morris@dep.state.fl.us

Watson, Stephanie M.

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Wednesday, September 20, 2006 2:50 PM
To: Watson, Stephanie M.
Cc: jlocklear@jonesedmunds.com
Subject: RE: Consent Agreement

Stephanie,
Paragraph 11a (permit modification application), and Paragraph 11b (site assessment plan, implementation and report) seem to be the pertinent items.
Susie

>>> "Watson, Stephanie M." <Stephanie.M.Watson@dep.state.fl.us>
>>> 9/20/2006 12:38 PM >>>
Susie,

In response to your question regarding the application fee for the permit modification, the correct fee is \$250.00.

I plan to send the County a clarification letter regarding Consent Agreement deadlines/status of compliance. For which Consent Agreement deadlines were you seeking clarification?

Thanks,

Stephanie

-----Original Message-----

From: Pelz, Susan
Sent: Thursday, September 14, 2006 7:17 AM
To: Watson, Stephanie M.
Subject: FW: Consent Agreement

fyi

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Wednesday, September 13, 2006 3:25 PM
To: Morris, John R.; Pelz, Susan
Cc: Glenn McCracken; jlocklear@jonesedmunds.com; JBanks@SCSEngineers.com
Subject: Consent Agreement

Susan,

I am currently waiting for a copy from the official records department in the Clerk's office of the fully executed sublease. I requested a PDF as well, so as soon as it is available I will forward you a copy. That document is dated August 30, 2006.

The report due on the 15th concerning the groundwater investigation is under review in my office.

Confirming that the new deadline date for the permit modification application referred to in item 11a of the Consent Agreement (120 days after execution of the CA or extended deadline (September 1) is September 30, 2006. There are several other x-days after CA execution deadlines for which I would like clarification.

Is this considered a minor permit modification application with a \$250 fee?
Please let me know as soon as possible so that I can get a check for the application fee at the only remaining opportunity this month (September 26).

Looking forward to hearing from you. Thanks.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax



Dept. of Environmental
Protection

SEP 15 2006

September 14, 2006

Mr. John Morris, P.G.

Florida Department of Environmental Protection – Southwest District
13051 N Telecom Parkway
Temple Terrace, FL 33632-0926

Southwest District

Re: Citrus County Central Class I Landfill
Response to Department's May 24, 2006 Correspondence
Jones Edmunds Project No.: 03860-021-01

John:

At the request of Citrus County, Jones Edmunds has prepared responses to comments provided by the Department in a letter to the Chairman of the Board of County Commissioners dated May 24, 2006. Enclosed please find two copies of our responses to your comments and two copies of the revised Groundwater Investigation Report.

Please feel free to call me at (352) 377-5821 if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "John Locklear", written over a horizontal line.

John Locklear
Project Manager

xc: Susan Metcalfe, P.G.
Katherine Weitz

730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352.377.3166 Fax
www.jonesedmunds.com

SEP 15 2006

Southwest District

**CITRUS COUNTY CENTRAL LANDFILL
GROUNDWATER
INVESTIGATION REPORT**

**RESPONSE TO FDEP REQUEST
FOR ADDITIONAL INFORMATION**

bound submittal
in hanging
folder in enforcement
file

Prepared for:

CITRUS COUNTY BOARD OF COUNTY COMMISSIONERS

110 North Apopka Avenue
Inverness, Florida 34450

Prepared by:

JONES EDMUNDS & ASSOCIATES, INC.

730 NE Waldo Road
Gainesville, Florida 32641

P.E. Certificate of Authorization #1841

P.G. Certificate of Authorization #133

September 2006

Allan H. Biddlecomb

Allan H. Biddlecomb, P.G.

Florida P.G. No. 0001258

9/15/06

Watson, Stephanie M.

From: Pelz, Susan
Sent: Monday, September 18, 2006 5:40 PM
To: Watson, Stephanie M.; Morgan, Steve
Subject: FW: executed sublease

Attachments: Executed sublease.tif



Executed
sublease.tif (206 KB).

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, September 18, 2006 2:08 PM
To: Pelz, Susan
Subject: executed sublease

Susan,
The attachment is a .tif file of the executed sublease. I will forward a certified copy, hard copy via US mail when I receive it.
Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax

ATL2

STATE OF FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES,
DIVISION OF FORESTRY

AMENDMENT NUMBER ONE TO SUBLEASE NUMBER 3316-05

THIS SUBLEASE AMENDMENT is entered into this 30th day of August, 2006, by and between the STATE OF FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES, DIVISION OF FORESTRY, hereinafter referred to as "SUBLESSOR" and CITRUS COUNTY, FLORIDA, hereinafter referred to as "SUBLESSEE";

W I T N E S S E T H

WHEREAS, the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida, by virtue of Section 253.03, Florida Statutes, holds title to certain lands and property for the use and benefit of the State of Florida; and

WHEREAS, on April 22, 1996, SUBLESSOR and SUBLESSEE entered into Sublease Number 3316-05; and

WHEREAS, SUBLESSOR and SUBLESSEE desire to amend the Sublease to include additional lands listed in Exhibit "A" for use by SUBLESSEE to construct and maintain monitoring wells.

NOW THEREFORE, in consideration of the mutual covenants and agreements contained herein, the parties hereto agree as follows:

1. The sublease agreement is hereby amended to add land described in Exhibit "A" to expand an existing well monitoring area within which SUBLESSEE may construct and maintain monitoring wells. As consideration for this land being added to this sublease, SUBLESSEE agrees to perform those obligations contained in Exhibit "B". The lands described in Exhibit "B" are for well monitoring purposes only and are not for any landfill expansion.
2. It is understood and agreed by SUBLESSOR and SUBLESSEE that in each and every respect the terms of the Sublease Number 3316-05 except as amended shall remain unchanged and in full force and effect and the same are hereby ratified, approved and confirmed by SUBLESSOR and SUBLESSEE.

IN WITNESS WHEREOF, the parties have caused this sublease agreement to be executed on the day and year first above written.

STATE OF FLORIDA DEPARTMENT OF
AGRICULTURE AND CONSUMER SERVICES,
DIVISION OF FORESTRY

Chander D. Baker
Witness
Chander D. Baker
Print/Type Witness Name

Suse P. Burch
Witness
Suse P. Burch
Print/Type Witness Name

By: Mike Gresham (SEAL)

Mike Gresham
Print/Type Name

Title: Director of Administration

"SUBLESSOR"

STATE OF FLORIDA
COUNTY OF LEON

The foregoing instrument was acknowledged before me this 28th day of August 2006, by Mike Gresham, as Director of Administration, on behalf of the STATE OF FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES, DIVISION OF FORESTRY. (He/She is personally known to me or has produced _____ as identification.

Karen A. Meyer
Notary Public, State of Florida

KAREN A. MEYER
Print/Type Notary Name



Commission Number: # DD 346679

Commission Expires: 10/20/2008

BY ITS BOARD OF COUNTY COMMISSIONERS

By: Wm. E. Baskin (SEAL)

Gary Bartell
Print/Type Name

Title: Chairman

(OFFICIAL SEAL)

ATTEST: Ellye Pryor
County Administrator and Ex-Officio
Clerk of the Board of County
Commissioners of Citrus County

"SUBLESSEE"

STATE OF FLORIDA
COUNTY OF CITRUS

The foregoing instrument was acknowledged before me this 8
day of August, 2006 by Gary Bartell, -and-
Chairman, as Chairman, and
, respectively, on behalf of the Board of County
Commissioners or Citrus County, Florida. They are personally known to
me or produced as identification.



Notary Public, State of Florida

Print/Type Notary Name

Commission Number:

Commission Expires:

Consented to by the TRUSTEES on 30th day of August 2006

Gloria C. Nelson
GLORIA C. NELSON, OPERATIONS AND
MANAGEMENT CONSULTANT MANAGER,
BUREAU OF PUBLIC LAND
ADMINISTRATION, DIVISION OF STATE
LANDS, DEPARTMENT OF ENVIRONMENTAL
PROTECTION

Approved as to Form and Legality

By: [Signature]
DEP Attorney

EXHIBIT "A"
Legal Description of the Subleased Premises

Legal Description:

A portion of Sections 1 and 12, Township 19 South, Range 18 East, and Section 6, Township 19 South, Range 19 East, Citrus County, Florida, more particularly described as follows:

Begin at the northeast corner of the southeast quarter of Section 1, Township 19 south, Range 18 East, Citrus County, Florida; thence south $89^{\circ} 43' 25''$ east along an easterly extension of the north boundary of the southeast quarter of said Section 1, a distance of 285.89 feet; thence south $00^{\circ} 16' 35''$ west, a distance of 2,930.05 feet; thence north $89^{\circ} 43' 25''$ west parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,925.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 421.83 feet; thence north $89^{\circ} 43' 25''$ west parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,320.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 2,030.38 feet to a point of intersection with the southerly right-of-way line of State Road Number 44, said point being 150.00 feet from, when measured at right angles to the centerline of said State Road Number 44; thence north $75^{\circ} 41' 50''$ east along said southerly right-of-way line, a distance of 309.98 feet; thence departing said southerly right-of-way line south $00^{\circ} 16' 35''$ west, a distance of 1,808.41 feet; thence south $89^{\circ} 43' 25''$ east parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,320.00 feet; thence south $00^{\circ} 16' 35''$ west, a distance of 421.83 feet; thence south $89^{\circ} 43' 25''$ east parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,325.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 2,630.05 feet to a point of intersection with the north boundary of the southeast quarter of said Section 1; thence south $89^{\circ} 43' 25''$ east along the north boundary of the southeast quarter of said Section 1, a distance of 14.11 feet to the point of beginning.

Said parcel containing 55.55 acres, more or less.

EXHIBIT "B"

1. SUBLESSEE shall donate the following described lands, consisting of approximately 33 acres, to the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida ("Board of Trustees"):

a. West $\frac{1}{2}$ of Tract 21, Homosassa Company's Subdivision of Section 33, Township 19 South, Range 17 East, according to map or plant thereof, as recorded in Plat 1, Page 4, of the public records of Citrus County, Florida. Containing 5.05 acres more or less.

b. A portion of the Northeast quarter of Section 14, Township 20 South, Range 19 East, Citrus County, Florida; more particularly described as follows: Begin at the northeast corner of Section 14, Township 20 South, Range 19 East, Citrus County, Florida; thence south $89^{\circ}42'37''$ west along the north line of the northeast $\frac{1}{4}$ of said Section 14, a distance of 389.96 feet; thence departing said north line south $00^{\circ}03'44''$ West a distance of 1,060.00 feet, thence south $89^{\circ}42'37''$ west, a distance of 917.00 feet to a point of intersection with the west line of the east $\frac{1}{4}$ of the northeast $\frac{1}{4}$ of said Section 14; thence south $00^{\circ}03'44''$ west along said west line, a distance of 182.59 feet; thence departing said west line north $89^{\circ}42'37''$ east, a distance of 1309.26 feet to a point of intersection with the east line of the northeast $\frac{1}{4}$ of said Section 14; thence north $00^{\circ}02'37''$ west along said east line, a distance of 1242.60 feet to the point of beginning. Containing 15.0 acres more or less.

c. Lots 1-6, Block 153, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,260 square feet more or less.

Lots 7-12, Block 153, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,426 square feet more or less.

Lots 1-6, Block 154, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,348 square feet more or less.

Lots 7-12, Block 154, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,434 square feet more or less.

Lots 7-12, Block 155, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,364 square feet more or less.

Lots 1-6, Block 156, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,342 square feet more or less.

Lots 8-12, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 65,274 square feet more or less.

Lot 6, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 13,058 square feet more or less.

Lot 1, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 13,058 square feet more or less.

The total of the properties described in c. above, are all located within Section 32, Township 19 South, Range 17 East, Citrus County Florida, containing 12.89 acres more or less.

SUBLESSEE shall comply with all Board of Trustees' requirements for donations of real property and pay all costs associated with this donation.

2. SUBLESSEE shall purchase and donate to Withlacoochee Forestry Center \$36,000 worth of herbicides for use in the eradication of invasive exotics on Withlacoochee State Forest over a consecutive three year period (\$12,000 per fiscal year beginning in 2006-07 fiscal year).

3. SUBLESSEE shall purchase and donate to Withlacoochee Forestry Center \$75,000 worth of road stabilization material for use on roads within Withlacoochee State Forest over a consecutive three year period (\$25,000 per fiscal year beginning in 2006-07 fiscal year).

file copy

Watson, Stephanie M.

From: Pelz, Susan
Sent: Thursday, September 14, 2006 7:17 AM
To: Watson, Stephanie M.
Subject: FW: Consent Agreement

fyi

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Wednesday, September 13, 2006 3:25 PM
To: Morris, John R.; Pelz, Susan
Cc: Glenn McCracken; jlocklear@jonesedmunds.com; JBanks@SCSEngineers.com
Subject: Consent Agreement

Susan,

I am currently waiting for a copy from the official records department in the Clerk's office of the fully executed sublease. I requested a PDF as well, so as soon as it is available I will forward you a copy. That document is dated August 30, 2006.

The report due on the 15th concerning the groundwater investigation is under review in my office.

Confirming that the new deadline date for the permit modification application referred to in item 11a of the Consent Agreement (120 days after execution of the CA or extended deadline (September 1) is September 30, 2006. There are several other x-days after CA execution deadlines for which I would like clarification.

Is this considered a minor permit modification application with a \$250 fee? Please let me know as soon as possible so that I can get a check for the application fee at the only remaining opportunity this month (September 26).

Looking forward to hearing from you. Thanks.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460
352-527-7670 phone
352-527-7672 fax

Watson, Stephanie M.

From: Pelz, Susan
Sent: Friday, September 08, 2006 3:59 PM
To: Watson, Stephanie M.; Morris, John R.
Subject: FW: sublease documents

fyi

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Friday, September 08, 2006 3:41 PM
To: Pelz, Susan
Subject: sublease documents

Susan,
We finally received the original executed lease documents this afternoon.
Susie

Watson, Stephanie M.

From: Pelz, Susan
Sent: Thursday, August 31, 2006 1:11 PM
To: 'Susan Metcalfe'
Cc: Glenn McCracken; Watson, Stephanie M.; Kutash, William; Morris, John R.
Subject: RE: Sublease documents for consent agreement

Susie,

An electronic copy now and then a certified hard copy when you get it would be good.

thanks,

If you have any questions, please call or email (email is better).

Susan J. Pelz, P.E.
Solid Waste Program Manager
Southwest District

13051 N. Telecom Parkway
Temple Terrace, Fl. 33637
813-632-7600 x 386
susan.pelz@dep.state.fl.us

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Thursday, August 31, 2006 10:32 AM
To: Pelz, Susan
Cc: Glenn McCracken
Subject: Sublease documents for consent agreement

Susan,

Kime Landes, a representative of Division of State Lands in Tallahassee, has just informed me that they are putting an executed original of the sublease in the mail to Citrus County today. Obviously we will not be able to provide your office with a copy by the September 1 deadline, however we will forward that document to your office as soon as it is received here.

Will you require a certified copy, scanned electronic version or a photocopy? Certified paper copy through the mail will take about one week longer than a scanned electronic version. A photocopy would take 2-3 days longer than the electronic version which can be e-mailed.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax

Watson, Stephanie M.

From: Pelz, Susan
Sent: Monday, August 28, 2006 9:00 AM
To: Watson, Stephanie M.
Cc: Morris, John R.; Morgan, Steve
Subject: FW: consent agreement schedule

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Friday, August 25, 2006 2:11 PM
To: Pelz, Susan
Cc: Glenn McCracken
Subject: consent agreement schedule

Susan,
The State agencies (DOF/DoACS and State Lands/DEP) are in the process of signing off on the sublease agreement. We expect that the paperwork will be completed just before the September 1 deadline established in our consent agreement. I will let you know if there are any changes. Please let me know if you have any questions.
Susie



Board of County Commissioners
DEPARTMENT OF PUBLIC WORKS
SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Inglis/Yankeetown area Toll Free (352) 489-2120

August 17, 2006

Kime Landes
Bureau of Public Land Administration
Mail Station 130
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Re: Citrus County Amendment to Sublease No. 3316-5

Dear Mr. Landes:

Enclosed are three originals of the sublease amendment executed by the Board of County Commissioners. These are being returned to your office for execution by the Division of Forestry and the Division of State Lands. Please return one fully executed original to my attention. The regulatory section of DEP (Solid Waste, Tampa) has established a deadline of September 1 for the County to have this paperwork completed. Thank you for your prompt attention to this matter.

I will forward the executed original to the County Clerk's Office for recording and filing in the official records.

Yours truly,

Susan J. Metcalfe
Director

SM

Attachments

CC: Thomas H. Dick, Assistant County Administrator
Glenn W. McCracken, Director, Public Works Department
Keith Mousel, Division of Forestry, Brooksville
David Speake, DOF, Tallahassee
Susan J. Pelz, Solid Waste Manager, FDEP, Tampa ✓

Dept. of Environmental
Protection

AUG 21 2006

Southwest District

STATE OF FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES,
DIVISION OF FORESTRY

AMENDMENT NUMBER ONE TO SUBLEASE NUMBER 3316-05

THIS SUBLEASE AMENDMENT is entered into this ____ day of _____, 20__, by and between the STATE OF FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES, DIVISION OF FORESTRY, hereinafter referred to as "SUBLESSOR" and CITRUS COUNTY, FLORIDA, hereinafter referred to as "SUBLESSEE";

W I T N E S S E T H

WHEREAS, the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida, by virtue of Section 253.03, Florida Statutes, holds title to certain lands and property for the use and benefit of the State of Florida; and

WHEREAS, on April 22, 1996, SUBLESSOR and SUBLESSEE entered into Sublease Number 3316-05; and

WHEREAS, SUBLESSOR and SUBLESSEE desire to amend the Sublease to include additional lands listed in Exhibit "A" for use by SUBLESSEE to construct and maintain monitoring wells.

NOW THEREFORE, in consideration of the mutual covenants and agreements contained herein, the parties hereto agree as follows:

1. The sublease agreement is hereby amended to add land described in Exhibit "A" to expand an existing well monitoring area within which SUBLESSEE may construct and maintain monitoring wells. As consideration for this land being added to this sublease, SUBLESSEE agrees to perform those obligations contained in Exhibit "B". The lands described in Exhibit "B" are for well monitoring purposes only and are not for any landfill expansion.
2. It is understood and agreed by SUBLESSOR and SUBLESSEE that in each and every respect the terms of the Sublease Number 3316-05 except as amended shall remain unchanged and in full force and effect and the same are hereby ratified, approved and confirmed by SUBLESSOR and SUBLESSEE.

IN WITNESS WHEREOF, the parties have caused this sublease agreement to be executed on the day and year first above written.

STATE OF FLORIDA DEPARTMENT OF
AGRICULTURE AND CONSUMER SERVICES,
DIVISION OF FORESTRY

Witness

Print/Type Witness Name

Witness

Print/Type Witness Name

By: _____ (SEAL)

Print/Type Name

Title: _____

"SUBLESSOR"

STATE OF FLORIDA
COUNTY OF LEON

The foregoing instrument was acknowledged before me this ____ day
of _____ 20__, by _____, as
_____, on behalf of the STATE OF
FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES, DIVISION OF
FORESTRY. He/She is personally known to me or has produced
_____ as identification.

Notary Public, State of Florida

Print/Type Notary Name

Commission Number:

Commission Expires:

CITUS COUNTY, FLORIDA
BY ITS BOARD OF COUNTY COMMISSIONERS

By: Gary Bartell (SEAL)

Gary Bartell
Print/Type Name

Title: Chairman

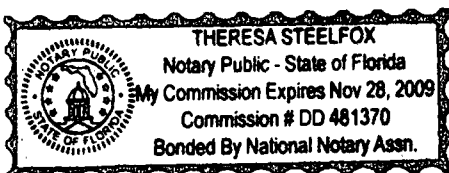
(OFFICIAL SEAL)

ATTEST: Betty Strigler
~~County Administrator and Ex-Officio~~
Clerk of the Board of County
Commissioners of Citrus County

"SUBLESSEE"

STATE OF FLORIDA
COUNTY OF CITRUS

The foregoing instrument was acknowledged before me this 8
day of August 2004 by Gary Bartell, and
Chairman, as Chairman, and
Chairman, respectively, on behalf of the Board of County
Commissioners or Citrus County, Florida. They are personally known to
me or produced as identification.



Theresa Steelfox
Notary Public, State of Florida

Print/Type Notary Name

Commission Number:

Commission Expires:

Consented to by the TRUSTEES on _____ day of _____ 20__.

GLORIA C. NELSON, OPERATIONS AND
MANAGEMENT CONSULTANT MANAGER,
BUREAU OF PUBLIC LAND
ADMINISTRATION, DIVISION OF STATE
LANDS, DEPARTMENT OF ENVIRONMENTAL
PROTECTION

Approved as to Form and Legality

By: _____
DEP Attorney

EXHIBIT "A"
Legal Description of the Subleased Premises

Legal Description:

A portion of Sections 1 and 12, Township 19 South, Range 18 East, and Section 6, Township 19 South, Range 19 East, Citrus County, Florida, more particularly described as follows:

Begin at the northeast corner of the southeast quarter of Section 1, Township 19 south, Range 18 East, Citrus County, Florida; thence south $89^{\circ} 43' 25''$ east along an easterly extension of the north boundary of the southeast quarter of said Section 1, a distance of 285.89 feet; thence south $00^{\circ} 16' 35''$ west, a distance of 2,930.05 feet; thence north $89^{\circ} 43' 25''$ west parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,925.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 421.83 feet; thence north $89^{\circ} 43' 25''$ west parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,320.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 2,030.38 feet to a point of intersection with the southerly right-of-way line of State Road Number 44, said point being 150.00 feet from, when measured at right angles to the centerline of said State Road Number 44; thence north $75^{\circ} 41' 50''$ east along said southerly right-of-way line, a distance of 309.98 feet; thence departing said southerly right-of-way line south $00^{\circ} 16' 35''$ west, a distance of 1,808.41 feet; thence south $89^{\circ} 43' 25''$ east parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,320.00 feet; thence south $00^{\circ} 16' 35''$ west, a distance of 421.83 feet; thence south $89^{\circ} 43' 25''$ east parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,325.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 2,630.05 feet to a point of intersection with the north boundary of the southeast quarter of said Section 1; thence south $89^{\circ} 43' 25''$ east along the north boundary of the southeast quarter of said Section 1, a distance of 14.11 feet to the point of beginning.

Said parcel containing 55.55 acres, more or less.

EXHIBIT "B"

1. SUBLESSEE shall donate the following described lands, consisting of approximately 33 acres, to the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida ("Board of Trustees"):

a. West $\frac{1}{2}$ of Tract 21, Homosassa Company's Subdivision of Section 33, Township 19 South, Range 17 East, according to map or plant thereof, as recorded in Plat 1, Page 4, of the public records of Citrus County, Florida. Containing 5.05 acres more or less.

b. A portion of the Northeast quarter of Section 14, Township 20 South, Range 19 East, Citrus County, Florida; more particularly described as follows: Begin at the northeast corner of Section 14, Township 20 South, Range 19 East, Citrus County, Florida; thence south $89^{\circ}42'37''$ west along the north line of the northeast $\frac{1}{4}$ of said Section 14, a distance of 389.96 feet; thence departing said north line south $00^{\circ}03'44''$ West a distance of 1,060.00 feet, thence south $89^{\circ}42'37''$ west, a distance of 917.00 feet to a point of intersection with the west line of the east $\frac{1}{2}$ of the northeast $\frac{1}{4}$ of said Section 14; thence south $00^{\circ}03'44''$ west along said west line, a distance of 182.59 feet; thence departing said west line north $89^{\circ}42'37''$ east, a distance of 1309.26 feet to a point of intersection with the east line of the northeast $\frac{1}{4}$ of said Section 14; thence north $00^{\circ}02'37''$ west along said east line, a distance of 1242.60 feet to the point of beginning. Containing 15.0 acres more or less.

c. Lots 1-6, Block 153, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,260 square feet more or less.

Lots 7-12, Block 153, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,426 square feet more or less.

Lots 1-6, Block 154, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,348 square feet more or less.

Lots 7-12, Block 154, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,434 square feet more or less.

Lots 7-12, Block 155, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,364 square feet more or less.

Lots 1-6, Block 156, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,342 square feet more or less.

Lots 8-12, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 65,274 square feet more or less.

Lot 6, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 13,058 square feet more or less.

Lot 1, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 13,058 square feet more or less.

The total of the properties described in c. above, are all located within Section 32, Township 19 South, Range 17 East, Citrus County Florida, containing 12.89 acres more or less.

SUBLESSEE shall comply with all Board of Trustees' requirements for donations of real property and pay all costs associated with this donation.

2. SUBLESSEE shall purchase and donate to Withlacoochee Forestry Center \$36,000 worth of herbicides for use in the eradication of invasive exotics on Withlacoochee State Forest over a consecutive three year period (\$12,000 per fiscal year beginning in 2006-07 fiscal year).

3. SUBLESSEE shall purchase and donate to Withlacoochee Forestry Center \$75,000 worth of road stabilization material for use on roads within Withlacoochee State Forest over a consecutive three year period (\$25,000 per fiscal year beginning in 2006-07 fiscal year).

Watson, Stephanie M.

From: Pelz, Susan
Sent: Monday, July 31, 2006 12:48 PM
To: Watson, Stephanie M.; Morris, John R.
Subject: FW: consent agreement activities

fyi

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Friday, July 28, 2006 4:45 PM
To: Pelz, Susan
Subject: consent agreement activities

Susan,

I have the sublease agreement here ready for execution by our Board at their next meeting (August 8). After the County signs, then Forestry and State Lands have to execute the paperwork. I am assured that everyone will be expediting this process. Please let me know if you need more information.

Susie

Watson, Stephanie M.

From: Pelz, Susan
Sent: Thursday, July 06, 2006 12:17 PM
To: Evans, Roger; Morgan, Steve; Morris, John R.; Watson, Stephanie M.
Subject: FW: Air Program Review of Citrus County Central Landfill NSPS Tier 2 Sampling and NMOC Emissions Estimate Report

fyi

-----Original Message-----

From: Zell, David
Sent: Thursday, July 06, 2006 12:15 PM
To: Pelz, Susan
Cc: Nasca, Mara; Galbraith, Bret
Subject: Air Program Review of Citrus County Central Landfill NSPS Tier 2 Sampling and NMOC Emissions Estimate Report

FYI,

On June 29, 2006 we received the above Tier 2 NMOC emission report (which you were also shown as receiving a copy of). The results of this report shows that the estimated NMOC emission from this landfill are currently well below the NSPS Subpart WWW 50 Mg/yr trigger level for requiring that a collection and control system be designed, installed and operated. Since the report also shows that the estimated NMOC emissions will still be below the trigger level for the next 5 years, in accordance with the provisions of Subpart WWW they will not be required to submit another Tier 2 NMOC emissions report until 2011, unless there is a change in permitted landfill capacity or the future disposal rates exceed the projections used in the MNOC estimate modeling.

Since the permitted capacity of the landfill is above the NSPS applicability level (2.5 MM Mg and 2.5 MM cubic meters), they are still required to get a Title V Major Source air operation permit. The application for this Title V operation permit is in-house and is now being processed (it had been held incomplete pending receipt of this Tier 2 NMOC emissions report). The Title V permit will not require any collection or control measures for LFG.

Please let me know if you have any questions.

David Zell
FDEP SWD District (Tampa)
Air Permit Engineer

7/6/2006

Watson, Stephanie M.

From: Pelz, Susan
Sent: Saturday, June 24, 2006 10:53 AM
To: Watson, Stephanie M.; Morgan, Steve; Morris, John R.
Subject: FW: gas monitoring result

fyi

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Thursday, June 22, 2006 4:06 PM
To: Pelz, Susan
Cc: Glenn McCracken; LKennelly@SCSEngineers.com
Subject: gas monitoring result

Susan,

This is to inform you that during the quarterly gas monitoring event on June 21, 2006, methane was detected in excess of the regulatory limit of 5% at the property boundary in gas probe GS2E.

The ongoing remediation defined in the Consent Agreement (OGC 05-1078), expansion of the leased area within the state forest surrounding the site, is the proposed response to this violation. A full report will be submitted as required by permit.

Susie Metcalfe

Susan Metcalfe, Director

Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone

352-527-7672 fax



Board of County Commissioners
DEPARTMENT OF PUBLIC WORKS
SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Ingles/Yankeetown area Toll Free (352) 489-2120

240592

June 9, 2006

Susan J. Pelz, P.E.
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

**Dept. of Environmental
Protection**

JUN 14 2006

Re: Citrus County Central Landfill
Permit No. 21375-008-SO/01
Consent Agreement OGC File No. 05-1078

Southwest District

Dear Ms. Pelz:

This is to update you on our activities related to the referenced Consent Agreement. Division of Forestry and County staff have completed negotiations on the terms of the agreement that will allow State Lands to process the sublease amendment for sublease 3316-05 (which covers the closed 60-acre landfill property). The amendment will provide the County with a sublease on the approximately 55-acre parcel that surrounds both the closed landfill and the active landfill as required in Paragraph 9 of the CA. This is the land that is intended to be used to expand our compliance boundary/monitoring zone.

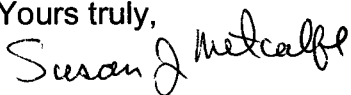
The Board of County Commissioners approved the terms on April 25, 2006. They directed staff to proceed with obtaining the required surveys, title insurance commitment and environmental site assessments that are prerequisite to the state moving forward with the land donation, which is one of the terms of the sublease agreement. The Board will approve a resolution to the same effect on July 27, which is also a prerequisite to the State proceeding with the land donation.

The surveys are completed. The title insurance commitment can be complete within days. The environmental site assessments can be complete within two weeks.

State Lands has provided a draft sublease amendment document to the County. The County has provided updated information back to State Lands related to the legal description of the lands to donate. The County Attorney's office is reviewing the draft sublease agreement. Copies of the draft sublease agreement and the updated information are attached. The timing after we submit all of our paperwork to State Lands is still not well defined.

Susan Pelz
June 9, 2006
Page 2

Please let me know if you need additional information.

Yours truly,


Susan Metcalfe, P.G.
Director

SM

Attachments

CC: Gary Bartell, Chairman, BOCC
Tom Dick, Assistant County Administrator
Glenn McCracken, Director, Public Works Department
John Banks, SCS Engineers, Tampa
John Locklear, JEA, Gainesville
Keith Mousel, Forestry, Brooksville
David Speake, Forestry, Tallahassee
David Stevenson, State Lands, Tallahassee

State of Florida
Dept. of Agriculture and Consumer Services
Division of Forestry
AMENDMENT NUMBER 1 TO SUBLEASE NUMBER 3316-05

THIS SUBLEASE AMENDMENT is entered into this _____ day of _____, 2005, by and between the State of Florida Department of Agriculture and Consumer Services, Division of Forestry, hereinafter referred to as "SUBLESSOR" and Citrus County, Florida, hereinafter referred to as "SUBLESSEE";

W I T N E S S E T H

WHEREAS, the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida, by virtue of Section 253.03, Florida Statutes, holds title to certain lands and property for the use and benefit of the State of Florida; and

WHEREAS, on April 22, 1996, SUBLESSOR and SUBLESSEE entered into Sublease Number 3316-05; and

WHEREAS, SUBLESSOR and SUBLESSEE desire to amend this Sublease to include additional lands listed in Exhibit "A" for use by SUBLESSEE to construct and maintain monitoring wells.

NOW THEREFORE, in consideration of the mutual covenants and agreements contained herein, the parties hereto agree as follows:

1. The sublease agreement is hereby amended to add land described in Exhibit "A" to expand an existing well monitoring area within which SUBLESSEE may construct and maintain monitoring wells. As consideration for this land being added to this sublease, SUBLESSEE agrees to perform those obligations contained in Exhibit "B". The lands described in Exhibit "B" are for well monitoring purposes only and are not for any landfill expansion.
2. It is understood and agreed by SUBLESSOR and SUBLESSEE that in each and every respect the terms of Sublease Number 3316-05 except as amended shall remain unchanged and in full force and effect and the same are hereby ratified, approved and confirmed by SUBLESSOR and SUBLESSEE.

IN WITNESS WHEREOF, the parties have caused this sublease agreement to be executed on the day and year first above written.

STATE OF FLORIDA DEPARTMENT OF
DEPARTMENT OF AGRICULTURE AND CONSUMER
SERVICES, DIVISION OF FORESTRY

By: _____ (SEAL)

Witness

Print/Type Witness Name

Print/Type Name

Title: _____

Witness

"SUBLESSOR"

Print/Type Witness Name

STATE OF FLORIDA
COUNTY OF LEON

The foregoing instrument was acknowledged before me this ____ day of
____ 20__, by _____, as _____ of
Division of Forestry, State of Florida Department of Agriculture and Consumer
Services, who is personally known to me or who has produced
_____ as identification.

Notary Public, State of Florida

Print/Type Notary Name

Commission Number:

Commission Expires:

CITRUS COUNTY, FLORIDA
BY ITS BOARD OF COUNTY COMMISSIONERS

Witness

By: _____ (SEAL)

Print/Type Witness Name

Print/Type Name

Witness

Title: _____

Print/Type Name

(OFFICIAL SEAL)

ATTEST: _____
County Administrator and Ex-Officio
Clerk of the Board of County
Commissioners of Citrus County

"SUBLESSEE"

STATE OF FLORIDA
COUNTY OF CITRUS

The foregoing instrument was acknowledged before me this _____ day of
_____ 20__, by _____ and _____, as
_____ and _____, respectively, on behalf of the Board
of County Commissioners of Citrus County, who are personally known to me or
who have produced _____ as identification.

Notary Public, State of Florida

Print/Type Notary Name

Commission Number:

Commission Expires:

Consented to by the TRUSTEES on _____ day of _____ 20__.

GLORIA C. NELSON, OPERATIONS AND
MANAGEMENT CONSULTANT MANAGER,
BUREAU OF PUBLIC LAND
ADMINISTRATION, DIVISION OF STATE
LANDS, DEPARTMENT OF ENVIRONMENTAL
PROTECTION

Approved as to Form and Legality

By: _____
DEP Attorney

EXHIBIT "A"
Legal Description of the Subleased Premises

Legal Description:

A portion of Sections 1 and 12, Township 19 South, Range 18 East, and Section 6, Township 19 South, Range 19 East, Citrus County, Florida, more particularly described as follows:

Begin at the northeast corner of the southeast quarter of Section 1, Township 19 south, Range 18 East, Citrus County, Florida; thence south $89^{\circ} 43' 25''$ east along an easterly extension of the north boundary of the southeast quarter of said Section 1, a distance of 285.89 feet; thence south $00^{\circ} 16' 35''$ west, a distance of 2,930.05 feet; thence north $89^{\circ} 43' 25''$ west parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,925.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 421.83 feet; thence north $89^{\circ} 43' 25''$ west parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,320.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 2,030.38 feet to a point of intersection with the southerly right-of-way line of State Road Number 44, said point being 150.00 feet from, when measured at right angles to the centerline of said State Road Number 44; thence north $75^{\circ} 41' 50''$ east along said southerly right-of-way line, a distance of 309.98 feet; thence departing said southerly right-of-way line south $00^{\circ} 16' 35''$ west, a distance of 1,808.41 feet; thence south $89^{\circ} 43' 25''$ east parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,320.00 feet; thence south $00^{\circ} 16' 35''$ west, a distance of 421.83 feet; thence south $89^{\circ} 43' 25''$ east parallel with the north boundary of the southeast quarter of said Section 1, a distance of 1,325.00 feet; thence north $00^{\circ} 16' 35''$ east, a distance of 2,630.05 feet to a point of intersection with the north boundary of the southeast quarter of said Section 1; thence south $89^{\circ} 43' 25''$ east along the north boundary of the southeast quarter of said Section 1, a distance of 14.11 feet to the point of beginning.

Said parcel containing 55.55 acres, more or less.

EXHIBIT "B"

1. SUBLESSEE shall donate the following described lands, consisting of approximately 23 acres, to the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida ("Board of Trustees"):

- a. All lots located in the Homasassa Villa Subdivision owned by SUBLESSEE.
- b. Block 21 in Section 33, Township 19 South, Range 17 East.
- c. Lots located in Section 32, Township 19 South, Range 17 East, south of Central Street, north of Oliver and east of Mallflower Avenue.

SUBLESSEE shall comply with all Board of Trustees' requirements for donations of real property and pay all costs associated with this donation.

2. SUBLESSEE shall purchase and donate to Withlacoochee Forestry Center \$36,000 worth of herbicides for use in the eradication of invasive exotics on Withlacoochee State Forest over a consecutive three year period (\$12,000 per year beginning in 2005-06 fiscal year).
3. SUBLESSEE shall purchase and donate to Withlacoochee Forestry Center \$75,000 worth of road stabilization material for use on roads within Withlacoochee State Forest over a consecutive three year period (\$25,000 per year beginning in 2005-06 fiscal year).

Exhibit "B"

1. SUBLESSEE shall donate the following described lands, consisting of approximately 33 acres, to the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida ("Board of Trustees"):

a. West $\frac{1}{2}$ of Tract 21, Homosassa Company's Subdivision of Section 33, Township 19 South, Range 17 East, according to map or plant thereof, as recorded in Plat 1, Page 4, of the public records of Citrus County, Florida. Containing 5.05 acres more or less.

b. Parcel "C", a portion of the Northeast quarter of Section 14, Township 20 South, Range 19 East, Citrus County, Florida; more particularly described as follows: Begin at the northeast corner of Section 14, Township 20 South, Range 19 East, Citrus County, Florida; thence south 89° 42' 37" west along the north line of the northeast $\frac{1}{4}$ of said Section 14, a distance of 389.96 feet; thence departing said north line south 00° 03' 44" West a distance of 1,060.00 feet, thence south 89° 42' 37" west, a distance of 917.00 feet to a point of intersection with the west line of the east $\frac{1}{2}$ of the northeast $\frac{1}{4}$ of said Section 14; thence south 00° 03' 44" west along said west line, a distance of 182.59 feet; thence departing said west line north 89° 42' 37" east, a distance of 1309.26 feet to a point of intersection with the east line of the northeast $\frac{1}{4}$ of said Section 14; thence north 00° 02' 37" west along said east line, a distance of 1242.60 feet to the point of beginning. Containing 15.0 acres more or less.

c. Lots 1-6, Block 153, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,260 square feet more or less.

Lots 7-12, Block 153, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,426 square feet more or less.

Lots 1-6, Block 154, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,348 square feet more or less.

Lots 7-12, Block 154, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,434 square feet more or less.

Lots 7-12, Block 155, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,364 square feet more or less.

Lots 1-6, Block 156, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 78,342 square feet more or less.

Lots 8-12, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 65,274 square feet more or less.

Lot 6, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 13,058 square feet more or less.

Lot 1, Block 157, Town of Homosassa as recorded in Plat Book 1, Page 6, Public records of Citrus County, Florida. Containing 13,058 square feet more or less.

The total of the properties described in "c" above, are all located within Section 32, Township 19 South, Range 17 East, Citrus County Florida, containing 12.89 acres more or less.

SUBLESSEE shall comply with all Board of Trustees' requirements for donations of real property and pay all costs associated with this donation.

Watson, Stephanie M.

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Friday, June 09, 2006 2:22 PM
To: Watson, Stephanie M.; Pelz, Susan
Cc: Glenn McCracken; Stevenson, David; mouselk@doacs.state.fl.us; schreiw@doacs.state.fl.us; David Speake <speaked@doacs.state.fl.us>
Subject: Status report on OGC Case No. 05-1078

Susan,

This is to update you on our activities related to the referenced Consent Agreement. I will be sending it on letterhead as well.

Division of Forestry and County staff have completed negotiations on the terms of the agreement that will allow State Lands to process the sublease amendment for sublease 33-6-05 (which covers the closed 60-acre landfill property). The amendment will provide the County with a sublease on the approximately 55-acre parcel that surrounds both the closed landfill and the active landfill as required in Paragraph 9 of the CA. This is the land that is intended to be used to expand our compliance boundary/monitoring zone.

The Board of County Commissioners approved the terms on April 25, 2006 and directed staff to proceed with obtaining the required surveys, title insurance commitment and environmental site assessments that are prerequisite to the state moving forward with the land donation, which is one of the terms of the sublease agreement. The Board will approve a resolution to the same effect on July 27, which is also a prerequisite to the State proceeding with the land donation.

The surveys are completed. The title insurance commitment can be complete within days. The environmental site assessments can be complete within 2 weeks.

State Lands has provided a draft sublease amendment document to the County. The County has provided updated information related to the legal description of the lands to donate back to State Lands. The County Attorney's office is reviewing the draft sublease agreement.

Copies of the draft sublease agreement and the updated information are attached as Word documents.

The timing after we submit all of our paperwork to State Lands is still not well defined.

Please let me know if you need additional information. Thanks.
Susie

Is your RETURN ADDRESS completed on the reverse side?

Ground Water Investigation Report - OGC # 05-1078

SENDER: Citrus County Central

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Chairman ~~Bradley Arnold~~
Citrus County
Board of County Commissioners
New Citrus County Courthouse
110 No. Apopka Avenue
Inverness FL 34450

7004 0750 0003 0516 2307

4b. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

8-26-6

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X

8. Addressee's Address (Only if requested and fee is paid)

Post Office Service.

Thank you for using Return Receipt.

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GAINESVILLE, FL 32611

FL 32611

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- Print your name, address, and ZIP Code in this box. •

State of Florida
Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Stephanie Watson
Solid Waste

R075



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Citrus County
Board of County Commissioners
New Citrus County Courthouse
110 No. Apopka Avenue
Inverness FL 34450



Department of Environmental Protection

290592

Jeb Bush
Governor

Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7004 0750 0003 0516 2307

May 24, 2006

Chairman Bradley Arnold
Citrus County Board of County Commissioners
110 North Apopka Avenue
Inverness, FL 34450

RE: Ground Water Investigation Report – Department Review Comments
Paragraph 8 of Consent Agreement, OGC Case No. 05-1078

Dear Chairman Arnold:

The Department has reviewed the following documents that were submitted pursuant to paragraph 8 of Consent Agreement OGC Case No. 05-1078:

- Document entitled "Citrus County Central Landfill, Ground Water Investigation Report" (GWIR), prepared by Jones Edmunds & Associates, Inc. (JEA), dated January 2006, received January 4, 2006;
- Letter regarding "Supplemental Information and Resampling Data for MW-15, Citrus County Central Landfill Ground Water Investigation," prepared by JEA, dated February 3, 2006, received February 6, 2006;
- Letter regarding "Additional Ground Water Investigation Results, Citrus County Central Landfill," prepared by JEA, dated February 15, 2006, received February 16, 2006; and,
- Letter regarding "Ground Water Sampling Status, Citrus County Central Class I Landfill," prepared by JEA, dated April 21, 2006, received April 24, 2006.

The Department has provided its review comments in the attached memorandum regarding the adequacy of the above-mentioned submitted materials to meet the requirements of the Groundwater Investigation Plan. Please submit revisions to the GWIR to address the attached comments by **September 15, 2006**. Please provide revisions that use a ~~strike-through~~ and underline format, or similar format, to facilitate review. Please also include the revision date as part of the header/footer for all revised or replacement pages (text, figures, tables and appendices).

If you have any questions, please feel free to contact me at (813) 632-7600 x 451, or John R. Morris at (813) 632-7600 x 336.

Sincerely,

Stephanie Watson

Stephanie Watson
Solid Waste Section
Southwest District

Enclosure: Department memorandum dated May 10, 2006

cc: Susan Metcalfe, Citrus County Solid Waste Management Division Director
William Kutash, Waste Program Administrator, FDEP Tampa
Susan Pelz, P.E., FDEP Tampa
Steve Morgan, FDEP Tampa

"More Protection, Less Process"

Printed on recycled paper.

Memorandum

Florida Department of Environmental Protection

TO: Stephanie Watson
FROM: John R. Morris, P.G. *JRM*
DATE: May 10, 2006
SUBJECT: Citrus County Central Landfill
OGC Case No. 05-1078
Review Comments Regarding "Ground Water Investigation Report"
cc: Susan Pelz, P.E.

Paragraph No. 6 of the referenced Consent Agreement required the implementation of the Department-approved "Ground Water Investigation Plan" (GWIP, provided as Exhibit A of the Consent Agreement). Paragraph No. 8 of the referenced Consent Agreement required the installation, development and initial sampling of wells MW-10 through MW-15 and MW-17, and submittal of a summary report with recommendations regarding the need to conduct further assessment activities in accordance with Exhibit A within 90 days of the effective date of the Consent Agreement. As the effective date of the Consent Agreement was September 20, 2005, the Ground Water Investigation Report was due by December 19, 2005, however the Department subsequently approved a time extension request to submit the GWIR by January 4, 2006.

This memorandum provides review comments regarding the adequacy of the submitted materials to meet the requirements of the GWIP. The submitted materials that were reviewed include the following:

- Document entitled "Citrus County Central Landfill, Ground Water Investigation Report" (GWIR), prepared by Jones Edmunds & Associates, Inc. (JEA), dated January 2006, received January 4, 2006;
- Letter regarding "Supplemental Information and Resampling Data for MW-15, Citrus County Central Landfill Ground Water Investigation," prepared by JEA, dated February 3, 2006, received February 6, 2006;
- Letter regarding "Additional Ground Water Investigation Results, Citrus County Central Landfill," prepared by JEA, dated February 15, 2006, received February 16, 2006; and,
- Letter regarding "Ground Water Sampling Status, Citrus County Central Class I Landfill," prepared by JEA, dated April 21, 2006, received April 24, 2006.

Please have the Respondent submit revisions to the GWIR to address the following comments. Please have the applicant provide revisions that use a ~~strike through~~ and underline format, or similar format, to facilitate review. Please also have the applicant include the revision date as part of the header/footer for all revised or replacement pages (text, figures, tables and appendices). Review comments regarding the referenced sections of the GWIR are presented below:

Section 2.3 – Ground Water Sampling

1. The second paragraph of this section indicated that ground water samples collected from wells MW-10 through MW-15 and MW-17 were analyzed for the parameters listed in Table 2 ("Initial Ground Water Sampling Parameters"). It is noted that the elevated detection levels reported for selected volatile organics and semi-volatile organics listed by 40 CFR Part 258, Appendix II do not demonstrate compliance with ground water standards or minimum criteria as summarized on the attached table. It is also noted that until final approval of the pending lease expansion with the Florida Division of Forestry has been resolved, Citrus County Solid Waste Management has agreed to include wells MW-10 through MW-15 and MW-17 in the in the routine (semi-annual) ground water sampling events required by Specific Condition No. E.4.b., of permit No. 21375-008-SO. The next routine ground water sampling event is scheduled for July 2006, however the parameters required for this upcoming sampling event do not include the parameters listed in 40 CFR Part 258, Appendix II. Please have the Respondent include analysis of the above-referenced volatile organics and semi-volatile organics for samples collected from wells MW-10 through MW-15 and MW-17 during the July 2006 sampling event using alternate methodologies as appropriate to demonstrate compliance with the Department's ground water standards and minimum criteria. Please have the Respondent submit revisions this section to reference this supplemental sampling event and results of analyses.

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2. Please have the Respondent submit revisions to this section to reference the initial sampling event (November 2005), resampling events conducted at well MW-15 (January 5, 2006 and January 27, 2006) and the upcoming supplemental sampling event referenced in review comment No. 1, above.

Section 2.4 – Ground Water Elevation Measurements

3. Please have the Respondent submit revisions to this section to provide a summary of ground water elevation data to be collected during the upcoming supplemental sampling event referenced in review comment No. 1, above. Please have the Respondent submit revisions to this section of the GWIR to include a new ground water surface contour map for the upcoming supplemental sampling event.

Section 2.5 – Hydraulic Testing

4. Field data of residual head vs. time collected during the hydraulic conductivity testing (“slug out” tests) conducted at wells MW-10 through MW-17 were provided in Appendix G. Please have the Respondent submit revisions to Appendix G to also include the graphical solutions prepared for each set of slug test data.

Section 3.1 – Site Specific Hydrogeology

5. Please have the Respondent submit revisions to this section to include the absence of limestone sediments in the soil borings completed at wells MW-10, MW-15 and MW-17 in the discussion of the variation in elevation of the sediments that comprise the top of the Ocala Formation.

Section 3.2 – Ground Water Sampling Results

6. Please have the Respondent submit revisions to the fourth paragraph of this section to include the occurrence of vinyl chloride that was reported at a concentration of 0.8 µg/L for the sample collected from well MW-13 during November 2005. Please have the Respondent submit revisions to the fourth paragraph of this section to include the results reported for the resampling events conducted at well MW-15.

7. Please have the Respondent submit revisions to this section to include a summary of the analytical results for the upcoming supplemental sampling event referenced in review comment No. 1, above.

Section 3.3.1 – Ground Water Flow Direction

8. Please have the Respondent submit revisions to this section to include the ground water elevations measured during the upcoming supplemental sampling event referenced in review comment No. 1, above, in the discussion of the direction of ground water flow.

Section 3.3.2 – Ground Water Flow Rate

9. Please have the Respondent submit revisions to this section (and Table 4) to include ground water velocity calculations also using the hydraulic gradient values obtained for the new ground water surface contour map for the upcoming supplemental sampling event referenced in review comment No. 1, above.

Section 4.0 – Summary of Findings and Recommendations

10. Please have the Respondent submit revisions to the third conclusion bullet item to be consistent with the response provided to review comment No. 8, above.

11. Please have the Respondent submit revisions to the fifth conclusion bullet item to include the results of the initial sampling event (November 2005), resampling events conducted at well MW-15 (January 5, 2006 and January 27, 2006) and the upcoming supplemental sampling event referenced in review comment No. 1, above.

12. Please have the Respondent submit revisions to the first recommendation bullet item to include the results of the initial sampling event (November 2005), resampling events conducted at well MW-15 (January 5, 2006 and January 27, 2006) and the upcoming supplemental sampling event referenced in review comment No. 1, above.

13. Based on the results of the resampling conducted at well MW-15 as summarized in the JEA letters dated February 3, 2006 and February 16, 2006, the Department does not object to the conclusion provided in the JEA letter dated April 21, 2006 that the implementation of assessment activities described in Section 5.0 of the GWIP (“Site Assessment”) is not required at this time. The continued appropriateness of this conclusion will be further evaluated based on the results provided for the upcoming supplemental sampling event referenced in review comment No. 1. As indicated in Section 1.0, Item 1.c., of the GWIP, in the event that primary ground water standards are exceeded in the upcoming supplemental sampling event at wells MW-10 through MW-15 and MW-17, site assessment activities at the proposed lease expansion area shall commence within 60 days of receipt of the analytical data. If required, site assessment activities shall be conducted and a Site Assessment Report shall be submitted in accordance with Section 5.0 of the GWIP. **This comment is provided for informational purposes and does not require a response.**

14. The second recommendation bullet item indicates that an application for minor modification to the operating permit for Citrus Central Landfill (No. 21375-008-SO) will be submitted following execution of the lease expansion with the Florida Division of Forestry. The Department does not object to the proposed modifications (landfill property boundary, zone of discharge, monitor well network and gas monitoring network) provided the lease expansion is executed. Please note that the current date for completion of the activities related to executing the lease expansion is **September 1, 2006**. As indicated in Section 1.0, Item 2.a., of the GWIP, in the event that the lease expansion is not completed by this due date or is denied by the Florida Division of Forestry, site assessment activities at the existing property boundary shall commence within 60 days of the end of the approved time extension or receipt of the denial from the Florida Division of Forestry. If required, site assessment activities shall be conducted and a Site Assessment Report shall be submitted in accordance with Section 5.0 of the GWIP. **This comment is provided for informational purposes and does not require a response.**

I can be contacted at (813) 632-7600, extension 336, to discuss these review comments.

Attachment – Summary of Inadequate Results for the November 16/17, 2005 Sampling Event
jrm

SUMMARY OF INADEQUATE RESULTS FOR THE NOVEMBER 16/17, 2005 SAMPLING EVENT

Facility Name -- Citrus Central Landfill
Analytical Laboratory -- ENCO Laboratories

County -- Citrus
Date Sampled -- 11/16 & 11/17/05

Date Received -- 2/6/06

PARAMETERS	Ground Water Criteria	Criteria Type	Monitor Well Identification Number						Notes (as needed)
			MW-10 A/F	MW-11 A/F	MW-12 AF	MW-13 AF	MW-14 AF	MW-15 AF	
SEMI-VOLATILE ORGANICS									
Benzo(a) anthracene	0.05	MC	<1	<1	<1	<1	<1	<1	Elevated MDL reported; PQL @ 0.2 µg/L
Benzo(b) fluoranthene	0.05	MC	<1	<1	<1	<1	<1	<1	Elevated MDL reported; PQL @ 0.1 µg/L
Benzo(k) fluoranthene	0.5	MC	<2	<2	<2	<2	<2	<2	Elevated MDL reported
Benzo(a) pyrene	0.2	1° GWS	<2	<2	<2	<2	<2	<2	Elevated MDL reported
Chlorobenzilate	0.1	MC	<1	<1	<1	<1	<1	<1	Elevated MDL reported; PQL @ 0.8 µg/L
Diallate	0.6	MC	<1	<1	<1	<1	<1	<1	Elevated MDL reported
Dibenzo(a,h) anthracene	0.005	MC	<2	<2	<2	<2	<2	<2	Elevated MDL reported; PQL @ 0.2 µg/L
Dimethoate	1.4	MC	<2	<2	<2	<2	<2	<2	Elevated MDL reported
2,4-dinitrotoluene	0.05	MC	<1	<1	<1	<1	<1	<1	Elevated MDL reported; PQL @ 0.2 µg/L
Disulfoton	0.3	MC	<2	<2	<2	<2	<2	<2	Elevated MDL reported; PQL @ 0.4 µg/L
Indeno(1,2,3-cd) pyrene	0.05	MC	<2	<2	<2	<2	<2	<2	Elevated MDL reported; PQL @ 0.2 µg/L
Kepone	0.004	MC	<20	<20	<20	<20	<20	<20	Elevated MDL reported; PQL @ 6 µg/L
Pentachloronitrobenzene	0.1	MC	<1	<1	<1	<1	<1	<1	Elevated MDL reported; PQL @ 0.3 µg/L
Phorate	1.4	MC	<2	<2	<2	<2	<2	<2	Elevated MDL reported

1° GWS = primary ground water standard

Units reported in µg/L

MC = minimum criteria (Chapter 62-777, F.A.C., Table I)

PQL = practical quantitation limits presented in Table C of DEP document "Guidance for the Selection of Analytical Methods and for the Evaluation of Practical Quantitation Limits" dated October 12, 2004; this document can be accessed at the following link: ftp://ftp.dep.state.fl.us/pub/labs/assessment/library/docs/62_777final.pdf.

Unless a PQL value is presented in the Notes column, the analytical laboratory must report MDL at or below the ground water standard or minimum criterion to demonstrate compliance for that parameter

JONES EDMUNDS

FILE
Dept. of Environmental
Protection

APR 24 2006

Southwest District

April 21, 2006

Mr. John Morris, P.G.
Florida Department of Environmental Protection – Southwest District
13051 N Telecom Parkway
Temple Terrace, FL 33632-0926

Re: Citrus County Central Class I Landfill
Groundwater Sampling Status
Jones Edmunds Project No.: 03860-021-01

Dear John:

The initial groundwater investigation activities required by Article 8 of Consent Agreement 05-1078 have been completed. The Groundwater Investigation Report summarizing the investigation activities and findings was submitted to your office on January 4, 2006.

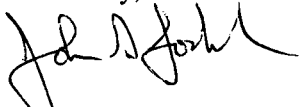
The initial laboratory analytical results reported for the groundwater sample collected from monitoring well MW-15 indicated the possible presence of Vinyl Chloride above the Primary Drinking Water Standard (PDWS) of 1 µg/L. A re-sampling of MW-15 was performed on January 27, 2006 with a resulting Vinyl Chloride concentration of 1 µg/L. The re-sample data was provided to you in a letter dated February 15, 2006.

The February letter also included a recommendation to initiate assessment activities in accordance with the Consent Agreement. However, per our discussion on April 13, 2006, the Vinyl Chloride concentration of 1 µg/L reported for the re-sample event does not represent an exceedance of the PDWS. Therefore, assessment activities will not be implemented at this time.

As we discussed, groundwater samples will be collected from the newly installed groundwater investigation wells in addition to the currently permitted compliance monitoring wells during the second semiannual compliance monitoring event. Sampling for this event is currently scheduled to begin on July 18, 2006.

Please feel free to call me at (352) 377-5821 if you have any questions.

Sincerely,



John Locklear
Project Manager

xc: Susan Metcalfe, P.G.
Katherine Weitz

X:\03860-CitrusCo\021-01.GroundwaterInvestigation\2006.04.21.Ltr.JMorrisDEP.GroundwaterSamplingStatus.doc

730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352.377.3166 Fax
www.jonesedmunds.com

Is your RETURN ADDRESS completed on the reverse side?

Letter = Approval of Request for 60-Day Extension of

SENDER:

- Deadline in CA per Para 16
OGC #05-1078
- Complete items 1 and/or 2 for additional services.
 - Complete items 3, 4a, and 4b.
 - Print your name and address on the reverse of this form so that we can return this card to you.
 - Attach this form to the front of the mailpiece, or on the back if space does not permit.
 - Write "Return Receipt Requested" on the mailpiece below the article number.
 - The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Chairman Gary Bartell
Citrus County
Board of County Commissioners
New Citrus County Courthouse
110 No. Apopka Avenue, #251
Inverness FL 34450

Article Number

7004 0750 0003 0516 7500

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☒ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

4/6/06

5. Received By: (Print Name)

Shirley Smith

6. Signature: (Addressee or Agent)

X [Signature]

8. Addressee's Address (Only if requested and fee is paid)

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FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

APR 10 2006

SOUTHWEST DISTRICT
TAMPA

State of Florida

Department of Environmental Protection

Southwest District

13051 North Telecom Parkway

Temple Terrace, FL 33637-0926

Stephanie Watson / Susan Pelz

Solid Waste

0926

R078



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Citrus County
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Inverness FL 34450

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Department of Environmental Protection

Jeb Bush
Governor

Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

CERTIFIED MAIL 7004 0750 0003 0516 7500
RETURN RECEIPT REQUESTED

April 4, 2006

Chairman Gary Bartell
Citrus County Board of County Commissioners
110 North Apopka Avenue
Inverness, FL 34450

RE: Approval of Request for 60-Day Extension of Deadlines in Consent Agreement per Paragraph 16
Consent Agreement, OGC Case #05-1078

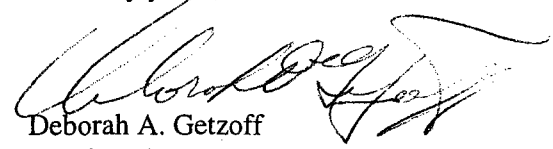
Dear Chairman Bartell:

The Department received the Citrus County Board of County Commissioners' (BOCC) March 15, 2006 (received March 17, 2006) request for a 150-day extension of the April 4, 2006 deadline for compliance with paragraphs 10, 11 a., 11.b., 11.c., 12.a., and 12.b. of the Consent Agreement. Additional supporting information dated April 3, 2006 was received via facsimile and email on April 3, 2006. The County requested this extension, per paragraph 16 of the Consent Agreement, because "while some of the activities are within staff capabilities, others are not [within the control of the County]."

Based on the information provided, it appears that the County is continuing to make reasonable efforts to resolve the conditions at the landfill site. Therefore, the Department does not object to the BOCC's request. The deadline to comply with paragraphs 10, 11 a., 11.b., 11.c., 12.a., and 12.b. of the Consent Agreement was extended to **April 4, 2006** by the Department's February 2, 2006 letter to the BOCC. Therefore, the new deadline to comply with paragraphs 10, 11 a., 11.b., 11.c., 12.a., and 12.b. is **September 1, 2006**.

If you have any questions, please feel free to contact me at (813) 632-7600 x 352, Susan Pelz, P.E., Solid Waste Program Manager, at (813) 632-7600 x 386, or Stephanie Watson at (813) 632-7600 x 451.

Sincerely yours,


Deborah A. Getzoff
District Director
Southwest District

DAG/sjp

cc: Glenn McCracken, Citrus County Public Works Director
Richard Wm. Wesch, Citrus County Administrator
Susan Metcalfe, Citrus County Solid Waste Management Division Director
William Kutash, Waste Program Administrator, FDEP Tampa
Steve Morgan, FDEP Tampa
Stephanie Watson, FDEP Tampa

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Board of County Commissioners

DEPARTMENT OF PUBLIC WORKS

SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Inglis/Yankeetown area Toll Free (352) 489-2120

April 3, 2006

Susan J. Pelz, P.E. *4/4/06*

Solid Waste Section

Florida Department of Environmental Protection

13051 N. Telecom Parkway

Temple Terrace, FL 33637-0926

Dept. of Environmental Protection

APR 04 2006

Re: Citrus County Central Landfill
Permit No. 21375-008-SO/01
Consent Agreement OGC File No. 05-1078

Southwest District

Dear Ms. Pelz:

This is an update to my letter of March 15, 2006 requesting a 120-day extension to the Consent Agreement schedule for obtaining the sublease extension from Forestry and State Lands. After further review of the timetable, we would like to modify that request to 150 days.

We held a meeting on March 30 between Forestry personnel, Homosassa Civic Club representatives and County staff from Solid Waste, Public Works and Community Services (Parks and Recreation). At that time we discussed Forestry's request for land donation of specific parcels to which the Civic Club objected, on the basis that many of the parcels were in an area they desire for a future park. As a result, Forestry modified their sublease amendment request to the items shown on Attachment 1. The County is requested to donate 33 acres of land and purchase herbicide and road stabilization material for Forestry over the next three years. County staff will present these proposals to our BOCC on April 25 for conceptual approval.

After the Board approves the concept for the agreement, we will have to arrange for the items shown on Attachment 2. Outside firms will be required for title commitment, environmental site assessment, and perhaps the surveys. The BOCC will have to approve those items. The earliest date for those approvals is May 9. The process of preparing the parcels for donation is expected to take approximately 60 days after that.

We have not yet seen the language of the proposed sublease expansion from State Lands. Now that the parcels have been identified, we understand that State Lands can begin their administrative activity by drafting the sublease expansion agreement for our review and BOCC execution.

After our Board executes the sublease expansion agreement and the land donation is offered, the Trustees of the Internal Improvement Trust Fund will have to review and accept (or deny)

Susan Pelz
April 3, 2006
Page 2

both. Only then will we have the document that is required in the Consent Agreement. We do not know how long the approval process takes, however it is our understanding that the meeting at which such business is conducted occurs once a month. Thus the request for 150 days is based on our best understanding of the process.

Thank you for your consideration of this request. We are encouraged that the negotiation step has been completed and that from here forward the process will move as quickly as it can through the agencies involved. As always, we would be happy to meet with FDEP staff in your Tampa office to discuss this issue.

Yours truly,

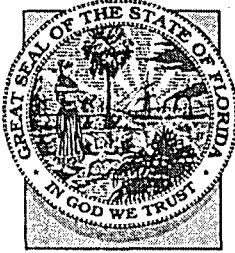


Susan Metcalfe, P.G.
Director

SM

Attachments

CC: Gary Bartell, Chairman, BOCC
Tom Dick, Assistant County Administrator
Glenn McCracken, Director, Public Works Department
John Banks, SCS Engineers, Tampa
John Locklear, JEA, Gainesville
Keith Mousel, Forestry, Brooksville
David Speake, Forestry, Tallahassee
David Stevenson, State Lands, Tallahassee



Florida Department of Agriculture and Consumer Services
CHARLES H. BRONSON, Commissioner
The Capitol • Tallahassee, FL 32399-0800

Please Respond to:
Withlacoochee Forestry Center
15019 Broad Street
Brooksville, Florida 34601

March 30, 2006

MEMORANDUM

TO: Susan Metcalfe, Director, Citrus County Landfill
FROM: Keith Mousel, Resource Administrator, WSF^{KM}
SUBJECT: Citrus County Landfill, Sublease Amendment Requests

Due to concerns raised by the Homosassa Civic Association regarding the swapping of land from Citrus County to the Board of Trustees in exchange for a sublease on 56 acres of land to be used by the Citrus County Landfill, the Withlacoochee Forestry Center would like to remove from our request all lots located in the Homosassa Villa Subdivision. The lots in question are found in Section 34, Township 19 South, Range 17 East, Citrus County, Florida. However, in order to keep the acreage exchange equivalent the Withlacoochee Forestry Center would like to see Citrus County exchange 15 acres of land in Section 14, Township 20 South, Range 19 East, Citrus County, Florida as well as the below listed items.

1. Acreage of approximately 18 acres that include:
 - a. Block 21 in Section 33, Township 19 South, Range 17 East.
 - b. Lots located in Section 32, Township 19 South, Range 17 East, south of Central Street, north of Oliver and east of Mallflower Avenue.
2. Purchase \$36,000 worth of herbicides for use in the eradication of invasive exotics on the Withlacoochee State Forest over a three year period (\$12,000 per year beginning in 2006-07 fiscal year).
3. Purchase \$75,000 worth of road stabilization material for use on roads within the Citrus Tract of the Withlacoochee State Forest over a three year period (\$25,000 per year beginning in 2006-07 fiscal year).

Per the staff of the Withlacoochee Forestry Center we feel this is the appropriate course of action and have informed our state office of this change request. Per a phone conversation our state office they are in agreement with this request and will be forwarding this recommendation onto the Division of State Lands.

If I can be of any further assistance to you please feel free to contact my office at 352-754-6777, ext. 117.

cc: Winnie Schreiber, Center Manager, WFC
John Kern, Deputy Chief, Field Operations
Steve Bohl, Deputy Chief, Forest Management



Florida Agriculture and Forest Products
\$53 Billion for Florida's Economy

Florida Department of
Environmental Protection

GUIDELINES FOR DONATIONS

ITEMS REQUIRED TO BEGIN DONATION PROCESS

1. Copy of recorded Deed verifying ownership in the Donor's name.
2. Tax ID number of proposed donation parcel.
3. Property Appraiser aerial photo and/or tax map of proposed donation parcel
4. Legal description of proposed donation parcel.

These items are forwarded to the Bureau of Public Land Administration to locate a managing agency for the property. Do not proceed any further until notified by BPLA as to whether the property is **ACCEPTED** or **REJECTED**.

If the property is rejected, we notify Donor in writing expressing our appreciation of their generous offer, however, at this time there is no managing agency for the property. Therefore, we must reject the offer.

*NOTE: Because Division of
Forestry has requested the donation,
Skip to
guidelines
below this
line*

If BPLA locates a managing agency for property, the next steps in the process are as follows:

1. *Order a title commitment insuring the BOARD OF TRUSTEES OF THE INTERNAL IMPROVEMENT TRUST FUND OF THE STATE OF FLORIDA
2. *Order a survey (unless waived by Bureau of Survey and Mapping)
3. *Order an Environmental Site Assessment (unless waived by the Division)
4. Donor agrees to execute a Title, Possession and Lien Affidavit and an Environmental Affidavit. (Provide to Donor for review)

*Usually ordered by DSL from companies contracted with the State of Florida, but can be Donor provided.

For mitigation or litigation, the Donor pays all costs for processing the donation.

If all of this is accomplished, we will prepare all of the closing documents and forward to the Donor for execution. We will review the executed documents for approval and if accepted we provide an Acceptance of Transfer to be attached to Deed before it is recorded. (Florida Statute 253.025 (8) (b))

Send memo to OMCII, Closing Supervisor, Closing Coordinator for BLA, BLMS, BSM and Title and Land Records advising of property acquired.

Forward file to Post Closing for processing.

Memorandum

Florida Department of
Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: ☒ Deborah A. Getzoff, Director of District Management
☐ Mike Farley, Asst. Director of District Management
☐ William Kutash, Program Administrator
☐ OGC

FROM/THROUGH: *Wk 4/3/06*
William Kutash, Environmental Administrator
Susan Pelz, P.E. Solid Waste Manager *4/3/06*
Stephanie Watson, Environmental Specialist III

DATE: April 3, 2006

FILE NAME: Citrus County Central Class I and Closed Class I Landfills OGC FILE# 05-1078
PROGRAM: Solid Waste COUNTY: Citrus

TYPE OF DOCUMENT:

WARNING ☐ FINAL ORDER ☐ CASE REPORT ☐
DRAFT ☐ OR FINAL ☐ NOV ☐ CONSENT ORDER ☐
PENALTY AUTHORIZATION ☐ EXTENSION REQUEST APPROVAL ☒

BRIEF DESCRIPTION: Citrus County BOCC's request for an extension of the deadline for compliance with paragraphs 10, 11.a., 11.b., 11.c., 12.a., and 12.b. of the Consent Agreement, per paragraph 16.

STAFF EVALUATION: Based on the information provided, it appears that the County is making reasonable efforts to complete the property transfer with State lands/Division of Forestry. Further, recent groundwater monitoring results (January 2006) have indicated that there are no groundwater exceedances in the compliance wells at the zone of discharge. The most recent gas monitoring report (3/17/06) indicates that although landfill gas concentrations exceed 100% LEL at the current property line on the east side of the facility, gas migration has not extended to the point of the proposed new property boundary.

Based on this, staff recommends approving the requested extension of time.

PENALTY SUMMARY:

ELRA PENALTY
EXTENT OF DEVIATION: ☐ POTENTIAL FOR HARM: ☐
PENALTY AMOUNT: ☐ COST AND EXPENSES: \$3,000

TOTAL PENALTY AMOUNT: \$3,000 APPROVED BY SECRETARY: N/A

Pelz, Susan

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, April 03, 2006 4:04 PM
To: Pelz, Susan
Cc: Glenn McCracken; Thomas Dick; Morris, John R.; Watson, Stephanie M.; jlocklear@jonesedmunds.com; DPenoyer@SCSEngineers.com; JBanks@SCSEngineers.com
Subject: Environmental monitoring related to Consent AgreementActivities

Susan,

During the phone conversation between John Morris and me earlier today, the Department inquired as to whether the County would be willing to monitor both the existing permitted monitoring sites for gas and groundwater as well as the monitoring sites installed as part of the Consent Agreement (OGC 05-1078) activities. This dual monitoring request would extend until the sublease extension can be granted by Forestry/State Lands/TIITF.

According to our current understanding of the timetable, and our request for a 150-day time extension, this would involve two gas monitoring events and one groundwater monitoring event. The next groundwater monitoring event is scheduled for July 2006. The next gas monitoring events are scheduled for May 2006 and August 2006.

The County is willing to perform this dual monitoring.

Please contact me if you need any additional information.

Susie Metcalfe

Pelz, Susan

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, April 03, 2006 1:47 PM
To: Pelz, Susan
Cc: Glenn McCracken; Thomas Dick; Watson, Stephanie M.
Subject: request for time extension



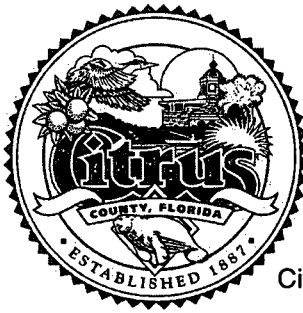
Pelz040306Con
itAgreementExt

Susan,

The attached letter will be forwarded hard copy to your office. The attachments referred to are being faxed to you at 813-632-7664. Please call to discuss if you wish.
Susie Metcalfe

Susan Metcalfe, Director
Citrus County Solid Waste Management Division
P.O. Box 340
Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax



Board of County Commissioners

DEPARTMENT OF PUBLIC WORKS

SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Inglis/Yankeetown area Toll Free (352) 489-2120

April 3, 2006

Susan J. Pelz, P.E.
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Re: Citrus County Central Landfill
Permit No. 21375-008-SO/01
Consent Agreement OGC File No. 05-1078

Dear Ms. Pelz:

This is an update to my letter of March 15, 2006 requesting a 120-day extension to the Consent Agreement schedule for obtaining the sublease extension from Forestry and State Lands. After further review of the timetable, we would like to modify that request to 150 days.

We held a meeting on March 30 between Forestry personnel, Homosassa Civic Club representatives and County staff from Solid Waste, Public Works and Community Services (Parks and Recreation). At that time we discussed Forestry's request for land donation of specific parcels to which the Civic Club objected, on the basis that many of the parcels were in an area they desire for a future park. As a result, Forestry modified their sublease amendment request to the items shown on Attachment 1. The County is requested to donate 33 acres of land and purchase herbicide and road stabilization material for Forestry over the next three years. County staff will present these proposals to our BOCC on April 25 for conceptual approval.

After the Board approves the concept for the agreement, we will have to arrange for the items shown on Attachment 2. Outside firms will be required for title commitment, environmental site assessment, and perhaps the surveys. The BOCC will have to approve those items. The earliest date for those approvals is May 9. The process of preparing the parcels for donation is expected to take approximately 60 days after that.

We have not yet seen the language of the proposed sublease expansion from State Lands. Now that the parcels have been identified, we understand that State Lands can begin their administrative activity by drafting the sublease expansion agreement for our review and BOCC execution.

After our Board executes the sublease expansion agreement and the land donation is offered, the Trustees of the Internal Improvement Trust Fund will have to review and accept (or deny)

Susan Pelz
April 3, 2006
Page 2

both. Only then will we have the document that is required in the Consent Agreement. We do not know how long the approval process takes, however it is our understanding that the meeting at which such business is conducted occurs once a month. Thus the request for 150 days is based on our best understanding of the process.

Thank you for your consideration of this request. We are encouraged that the negotiation step has been completed and that from here forward the process will move as quickly as it can through the agencies involved. As always, we would be happy to meet with FDEP staff in your Tampa office to discuss this issue.

Yours truly,

Susan Metcalfe, P.G.
Director

SM

Attachments

CC: Gary Bartell, Chairman, BOCC
Tom Dick, Assistant County Administrator
Glenn McCracken, Director, Public Works Department
John Banks, SCS Engineers, Tampa
John Locklear, JEA, Gainesville
Keith Mousel, Forestry, Brooksville
David Speake, Forestry, Tallahassee
David Stevenson, State Lands, Tallahassee



BOARD OF COUNTY COMMISSIONERS

DEPARTMENT OF PUBLIC WORKS

SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460

E-Mail: landfillinfo@bocc.citrus.fl.us

Telephone: (352) 527-7670 FAX (352) 527-7672

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Inglis/Yankeetown Area

Toll Free (352) 489-2120

TELECOPIER MESSAGE

DATE:

4/3/06

TIME:

1:50

NO. OF PAGES

3

INCLUDING COVER SHEET:

TO:

Susan Peltz

FDEP-Tampa

813 632 7664

FROM:

Sasie Metcalfe

SUBJECT:

attachments to letter dated 4/3

MESSAGE:



Florida Department of Agriculture and Consumer Services
CHARLES H. BRONSON, Commissioner
The Capitol • Tallahassee, FL 32399-0800

Please Respond to:
Withlacoochee Forestry Center
15019 Broad Street
Brooksville, Florida 34601

March 30, 2006

MEMORANDUM

TO: Susan Metcalfe, Director, Citrus County Landfill
FROM: Keith Mousel, Resource Administrator, WSF *KM*
SUBJECT: Citrus County Landfill, Sublease Amendment Requests

Due to concerns raised by the Homosassa Civic Association regarding the swapping of land from Citrus County to the Board of Trustees in exchange for a sublease on 56 acres of land to be used by the Citrus County Landfill, the Withlacoochee Forestry Center would like to remove from our request all lots located in the Homosassa Villa Subdivision. The lots in question are found in Section 34, Township 19 South, Range 17 East, Citrus County, Florida. However, in order to keep the acreage exchange equivalent the Withlacoochee Forestry Center would like to see Citrus County exchange 15 acres of land in Section 14, Township 20 South, Range 19 East, Citrus County, Florida as well as the below listed items.

1. Acreage of approximately 18 acres that include:
 - a. Block 21 in Section 33, Township 19 South, Range 17 East.
 - b. Lots located in Section 32, Township 19 South, Range 17 East, south of Central Street, north of Oliver and east of Mallflower Avenue.
2. Purchase \$36,000 worth of herbicides for use in the eradication of invasive exotics on the Withlacoochee State Forest over a three year period (\$12,000 per year beginning in 2006-07 fiscal year).
3. Purchase \$75,000 worth of road stabilization material for use on roads within the Citrus Tract of the Withlacoochee State Forest over a three year period (\$25,000 per year beginning in 2006-07 fiscal year).

Per the staff of the Withlacoochee Forestry Center we feel this is the appropriate course of action and have informed our state office of this change request. Per a phone conversation our state office they to are in agreement with this request and will be forwarding this recommendation onto the Division of State Lands.

If I can be of any further assistance to you please feel free to contact my office at 352-754-6777, ext. 117.

cc: Winnie Schreiber, Center Manager, WFC
John Kern, Deputy Chief, Field Operations
Steve Bohl, Deputy Chief, Forest Management



Florida Agriculture and Forest Products

Florida Department of
Environmental Protection

GUIDELINES FOR DONATIONS

ITEMS REQUIRED TO BEGIN DONATION PROCESS

1. Copy of recorded Deed verifying ownership in the Donor's name.
2. Tax ID number of proposed donation parcel.
3. Property Appraiser aerial photo and/or tax map of proposed donation parcel
4. Legal description of proposed donation parcel.

These items are forwarded to the Bureau of Public Land Administration to locate a managing agency for the property. Do not proceed any further until notified by BPLA as to whether the property is **ACCEPTED** or **REJECTED**.

If the property is rejected, we notify Donor in writing expressing our appreciation of their generous offer, however, at this time there is no managing agency for the property. Therefore, we must reject the offer.

*NOTE: Because Division of
Forestry has requested the donations,
Skip to
guidelines
below this
line.*

If BPLA locates a managing agency for property, the next steps in the process are as follows:

1. *Order a title commitment insuring the BOARD OF TRUSTEES OF THE INTERNAL IMPROVEMENT TRUST FUND OF THE STATE OF FLORIDA.
2. *Order a survey (unless waived by Bureau of Survey and Mapping).
3. *Order an Environmental Site Assessment (unless waived by the Division)
4. Donor agrees to execute a Title, Possession and Lien Affidavit and an Environmental Affidavit. (Provide to Donor for review)

*Usually ordered by DSL from companies contracted with the State of Florida, but can be Donor provided.

For mitigation or litigation, the Donor pays all costs for processing the donation.

If all of this is accomplished, we will prepare all of the closing documents and forward to the Donor for execution. We will review the executed documents for approval and if accepted we provide an Acceptance of Transfer to be attached to Deed before it is recorded. (Florida Statute 253.025 (8) (b))

Send memo to OMCI, Closing Supervisor, Closing Coordinator for BLA, BLMS, BSM and Title and Land Records advising of property acquired.

Forward file to Post Closing for processing.

Watson, Stephanie M.

From: Vazquez, Pamala
Sent: Monday, April 03, 2006 10:13 AM
To: Getzoff, Deborah; Pelz, Susan; Watson, Stephanie M.; Kutash, William
Subject: article

good morning everyone---please let me know when there is movement on this Consent Order deadline.. tx, pam

CITRUS COUNTY CHRONICLE

County proposes land swap to comply with landfill testing requirements

By Chronicle staff

Citrus County officials have come up with a deal with local state forestry officials that could solve the county's problem at the landfill. The only problem is that the time allowed for solution of the problem will run out Monday, and if the county can't get a time extension from another state agency, it could face fines of up to \$10,000 a day.

The county is under the gun with the Department of Environmental Protection (DEP) to get methane monitoring sites around the current landfill. To do so, the county has been negotiation with forestry officials to swap land the county has for forestry land around the landfill.

At a meeting Thursday, some Homosassa Civic Club members became concerned that the county was considering a swap for land adjacent to Bluebird Springs that had been slated for expansion of the park.

After explanation of the plan and discussions, county Solid Waste Director Suzie Metcalfe said that land was taken off the table. Other properties were considered, she said and the forestry officials came back Friday with some 33 acres of county lands - in addition to some herbicides and road material - it would be willing to swap for the 54 acres around the landfill the county needs.

Now the proposed deal has to go to Tallahassee and up through a number of agencies before finally being considered for approval by the governor and cabinet.

Metcalfe said she is asking for an extension from DEP for that process.

*Pamala Vazquez
External Affairs Coordinator
Florida Dept. of Environmental Protection*

813-632-7600 ext. 495

Cell: 813-376-9593

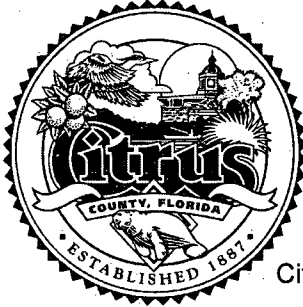
Fax: 813-632-7665

email: pamala.vazquez@dep.state.fl.us

Watson, Stephanie M.

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, April 03, 2006 8:03 AM
To: Watson, Stephanie M.
Subject: CA extension

Stephanie,
I need feedback from some folks who did not work over the weekend to complete the request.
It will be complete today.
Susie



Board of County Commissioners
DEPARTMENT OF PUBLIC WORKS
SOLID WASTE MANAGEMENT DIVISION

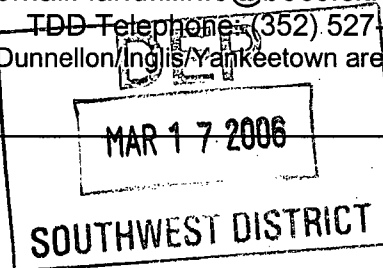
P.O. Box 340, Lecanto, Florida 34460

Telephone: (352) 527-7670 FAX: (352) 527-7672

email: landfillinfo@bocc.citrus.fl.us

TDD Telephone: (352) 527-5303

Citrus Springs/Dunnellon/Ingles/Yankeetown area Toll Free (352) 489-2120



March 15, 2006

Susan J. Pelz, P.E.
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Re: Citrus County Central Landfill
Permit No. 21375-008-SO/01
Consent Agreement OGC File No. 05-1078

Dear Ms. Pelz:

According to the referenced Consent Agreement and subsequent correspondence from Ms. Getzoff to the BOCC, the current deadline for obtaining a sublease expansion from Forestry and State Lands is April 4, 2006. This request, on behalf of Citrus County, is for an additional extension to that deadline of 120 days.

We received information from State Lands as to the requirements for making a land donation on February 16. The County's Land Section reviewed the information and indicated that our Board will have to approve having these actions undertaken. While some of the activities are within staff capabilities, others are not. Use of outside firms for most activities may expedite the work, which would also require BOCC approval. Our Board meets only two times per month.

In the interim, the County has received objections from citizens concerning some of the parcels proposed to be donated to the State in exchange for the buffer property surrounding the landfill. The County, Forestry and the citizen group are working to resolve the issue. We hope to have a consensus within a couple of weeks.

We have not yet seen the language of the proposed sublease expansion from State Lands, although we have reviewed the specific conditions proposed by Forestry. When the identity of the donation parcels has been confirmed and Forestry can finalize the specific conditions document, we understand that State Lands will begin their administrative activity by drafting the sublease expansion agreement for our review.


The process of preparing the parcels for donation is expected to take approximately 60 days. After our Board executes the sublease expansion agreement and the land donation is offered, the Trustees of the Internal Improvement Trust Fund will have to review and accept (or deny) both. Only then will we have the document that is required in the Consent Agreement. We do not know how long the approval process takes, however it is our understanding that the

Susan Pelz
March 15, 2006
Page 2

meeting at which such business is conducted occurs once a month. Thus the request for 120 days is based on our best understanding of the process.

Thank you for your consideration of this request.

Yours truly,



Susan Metcalfe, P.G.
Director

SM

CC: Gary Bartell, Chairman, BOCC
Richard Wm. Wesch, County Administrator
Tom Dick, Assistant County Administrator
Glenn McCracken, Director, Public Works Department
John Banks, SCS Engineers, Tampa
John Locklear, JEA, Gainesville
Keith Mousel, Forestry, Brooksville
David Speake, Forestry, Tallahassee
David Stevenson, State Lands, Tallahassee

Watson, Stephanie M.

From: Pelz, Susan
Sent: Friday, March 31, 2006 11:42 AM
To: Watson, Stephanie M.
Subject: FW: Consent Agreement timetable

this is the last correspondence I got from Susie

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Wed 3/22/2006 6:53 PM
To: Pelz, Susan
Cc:
Subject: Consent Agreement timetable

Susan,

Please give me a call Thursday to discuss my 3/15 letter and status of the project.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division
P.O. Box 340
Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax

3/31/2006

Watson, Stephanie M.

From: Morgan, Steve
Sent: Monday, February 27, 2006 9:51 AM
To: Pelz, Susan; Watson, Stephanie M.; Morris, John R.
Subject: FW: Landfill Gas Monitoring

FYI

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, February 27, 2006 9:23 AM
To: Morgan, Steve
Cc: Glenn McCracken
Subject: Landfill Gas Monitoring

Steve,
SCS Engineers performed routine landfill gas monitoring in the probes that are a part of the current permit on Friday February 24, 2006 These are not the probes set out at the 300-foot from the property boundary.

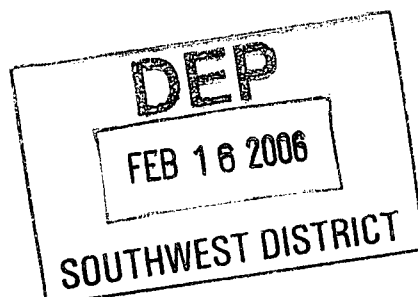
During that event, they found methane concentrations at or above the regulatory limit of 5 % at the property boundary in the following locations:
GS-2E
GS-4E.

The activities associated with the consent agreement are the intended investigative and remedial actions. A full report will be submitted when we receive this from SCS.
Susie

February 15, 2006

Ms. Deborah A. Getzoff
District Director

Florida Department of Environmental Protection – Southwest District
13051 N Telecom Parkway
Temple Terrace, FL 33632-0926



Re: Citrus County Central Class I Landfill
Additional Groundwater Investigation Results
Jones Edmunds Project No.: 03860-021-01

Dear Ms. Getzoff:

The initial groundwater investigation activities required by Article 8 of Consent Agreement 05-1078 have been completed. The Groundwater Investigation Report summarizing the investigation activities and findings was submitted to your office on January 4, 2006. The initial laboratory analytical results reported for the groundwater sample collected from monitoring well MW-15 indicated the possible presence of Vinyl Chloride above the Primary Drinking Water Standard (PDWS) of 1 µg/L. The January 4th submittal included a recommendation to re-sample MW-15 to confirm the reported Vinyl Chloride exceedance. The re-sampling was performed on January 5, 2006 and the results were forwarded to your office on February 6, 2006. The January 5th re-sampling data indicated a Vinyl Chloride concentration below the PDWS, however the presence of Vinyl Chloride in the equipment blank rendered the data somewhat suspect. Therefore, a second re-sampling was performed on January 27, 2006. A copy of the January 27th data is attached to this letter. The second re-sampling data for MW-15 indicated the presence of Vinyl Chloride at the PDWS of 1 µg/L. Therefore, in accordance with Article 11b and Exhibit A of the Consent Agreement the County shall commence with site assessment activities to address the groundwater contamination reported for monitoring well MW-15.

Article 11b of the Consent Agreement requires commencement of site assessment activities within 150 days of the effective date of the agreement. However, the Department granted an extension of several deadlines including 11b in your February 2, 2006 letter to the County. The revised deadline is April 4, 2006. Therefore, site assessment activities will commence prior to April 4, 2006. In accordance with Rule 62-780, F.A.C., we will contact Mr. Morris to discuss details of the site assessment activities prior to implementation.

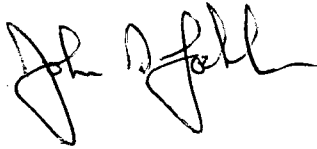
730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352-377.3166 Fax
www.jonesedmunds.com

Ms. Getzoff
February 15, 2006
Page 2

Please feel free to call me at (352) 377-5821 if you have any questions regarding this request. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "John Locklear". The signature is stylized with a large, sweeping "J" and "L".

John Locklear
Project Manager

xc: Susan Metcalfe, P.G.
John Morris, P.G.
✓Stephanie Watson

Citrus Co Landfill Groundwater Investigation

Parameter Monitoring Report

PART III Analytical Results

Facility GMS #: SWD/09/39859

Test Site ID #:

Well Name: MW-15

Classification of Ground Water: GII

Ground Water Elevation (NGVD):

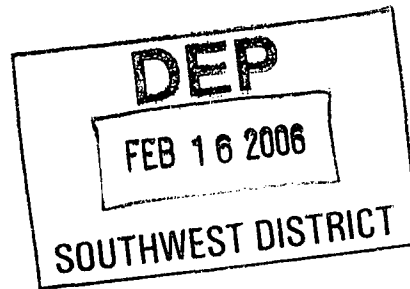
Sampling Date/Time: 01/05/06 8:50:00 AM

Report Period: JANUARY 2006

Well Purged: Yes

Well Type: ☐ Background
☐ Intermediate
☐ Compliance
☒ Other
☐ Detection

STORET CODE	PARAMETER MONITORED	SAMPLING METHOD	FIELD FILTERED	ANALYSIS METHOD	ANALYSIS DATE/TIME	ANALYSIS RESULT *	UNITS	DETECTION LIMIT/UNITS
00094	CONDUCTIVITY (FIELD)	SP	No	EPA 120.1	01/05/06 8:50:00 AM	81	µmhos/cm	
00406	pH (FIELD)	SP	No	EPA 150.1	01/05/06 8:50:00 AM	5.22	S.U.	
00010	TEMPERATURE (FIELD)	SP	No	EPA 170.1	01/05/06 8:50:00 AM	25.1	Deg. C	
82078	TURBIDITY (FIELD)	SP	No	EPA 180.1	01/05/06 8:50:00 AM	9.85	NTU	
00299	DISSOLVED OXYGEN (FIELD)	SP	No	EPA 360.1	01/05/06 8:50:00 AM	.66	mg/L	
39175	VINYL CHLORIDE	SP	No	EPA 8260	01/09/06 10:32:00 PM	<0.5	µg/L	.5µg/L



Citrus Co Landfill Groundwater Investigation

Parameter Monitoring Report

PART III Analytical Results

Facility GMS #: SWD/09/39859

Test Site ID #:

Well Name: MW-15 R

Classification of Ground Water: GII

Ground Water Elevation (NGVD):

Sampling Date/Time: 01/27/06 8:27:00 AM

Report Period: JANUARY 2006

Well Purged: Yes

Well Type: ☐ Background

☐ Intermediate

☐ Compliance

☒ Other

☐ Detection

STORET CODE	PARAMETER MONITORED	SAMPLING METHOD	FIELD FILTERED	ANALYSIS METHOD	ANALYSIS DATE/TIME	ANALYSIS RESULT *	UNITS	DETECTION LIMIT/UNITS
39175	VINYL CHLORIDE	SP	No	EPA 624	02/02/06 1:09:00 AM	1	µg/L	0.5µg/L
00094	CONDUCTIVITY (FIELD)	SP	No	Field	01/27/06 8:27:00 AM	61	µmhos/cm	µmhos/cm
00299	DISSOLVED OXYGEN (FIELD)	SP	No	Field	01/27/06 8:27:00 AM	0.29	mg/L	mg/L
00406	pH (FIELD)	SP	No	Field	01/27/06 8:27:00 AM	4.93	pH Units	pH Units
00010	TEMPERATURE (FIELD)	SP	No	Field	01/27/06 8:27:00 AM	25.31	°C	°C
82078	TURBIDITY (FIELD)	SP	No	Field	01/27/06 8:27:00 AM	2.38	NTU	NTU

Citrus Co Landfill Groundwater Investigation

Parameter Monitoring Report

PART III Analytical Results

Facility GMS #: SWD/09/39859

Test Site ID #:

Well Name: EQUBLK (CCIR-EQ1)

Classification of Ground Water: QAQC

Ground Water Elevation (NGVD):

Sampling Date/Time: 01/05/06 8:06:00 AM

Report Period: JANUARY 2006

Well Purged:

Well Type: ☐ Background
☐ Intermediate
☐ Compliance
☐ Other
☐ Detection

STORET CODE	PARAMETER MONITORED	SAMPLING METHOD	FIELD FILTERED	ANALYSIS METHOD	ANALYSIS DATE/TIME	ANALYSIS RESULT *	UNITS	DETECTION LIMIT/UNITS
39175	VINYL CHLORIDE	SP	No	EPA 8260	01/09/06 10:02:00 PM	1.	µg/L	.5µg/L

Citrus Co Landfill Groundwater Investigation

Parameter Monitoring Report

PART III Analytical Results

Facility GMS #: SWD/09/39859

Test Site ID #:

Well Name: TRIP (CCIR-TB1)

Classification of Ground Water: QAQC

Ground Water Elevation (NGVD):

Sampling Date/Time: 01/05/06

Report Period: JANUARY 2006

Well Purged:

Well Type: ☐ Background
☐ Intermediate
☐ Compliance
☐ Other
☐ Detection

STORET CODE	PARAMETER MONITORED	SAMPLING METHOD	FIELD FILTERED	ANALYSIS METHOD	ANALYSIS DATE/TIME	ANALYSIS RESULT *	UNITS	DETECTION LIMIT/UNITS
39175	VINYL CHLORIDE		No	EPA 8260	01/09/06 11:02:00 PM	<0.5	µg/L	.5µg/L

Citrus Co Landfill Groundwater Investigation

Parameter Monitoring Report

PART III Analytical Results

Facility GMS #: SWD/09/39859

Test Site ID #:

Well Name: TRIP R (CCI05R2-TB3)

Classification of Ground Water: QAQC

Ground Water Elevation (NGVD):

Sampling Date/Time: 01/27/06

Report Period: JANUARY 2006

Well Purged:

Well Type: ☐ Background
☐ Intermediate
☐ Compliance
☐ Other
☐ Detection

STORET CODE	PARAMETER MONITORED	SAMPLING METHOD	FIELD FILTERED	ANALYSIS METHOD	ANALYSIS DATE/TIME	ANALYSIS RESULT *	UNITS	DETECTION LIMIT/UNITS
39175	VINYL CHLORIDE		No	EPA 624	02/02/06 1:39:00 AM	<0.5	µg/L	0.5µg/L

Environmental Conservation Laboratories, Inc.
10775 Central Port Drive
Orlando, Florida 32824-7009
407 / 826-5314
Fax 407 / 850-6945
www.encolabs.com



DHRS Certification No. E83182

CLIENT : Jones Edmunds & Associates, Inc.
ADDRESS: 730 N.E.Waldo Road
Bldg.A
Gainesville, FL 32641

REPORT # : ORL40561
DATE SUBMITTED: January 6, 2006
DATE REPORTED : January 13, 2006

ATTENTION: Tim Cully

SAMPLE IDENTIFICATION

Samples submitted and
identified by client as:

REFERENCE: CITRUS CO.

03860-022-01-1000

01/05/06

ORL40561-1 : EQB#1 (CCIR-EQ1) @ 08:06
ORL40561-2 : MW-15 (CCIR-15) @ 08:50
ORL40561-3 : TB#1 (CCIR-TB1)

Unless otherwise noted in an attached project narrative, all samples were received in acceptable condition and processed in accordance with the referenced methods/procedures. This data has been produced in accordance with NELAC Standards (June, 2003). This report shall not be reproduced except in full, without the written approval of the laboratory. Results for these procedures apply only to the samples as submitted.

Note: Data within this document has been reported to the laboratory Method Detection Limit (MDL). Where positive results are obtained at levels below the lowest calibration standard, an appropriate qualifier has been assigned.

PROJECT MANAGER

A handwritten signature in black ink, appearing to read "Kelly Samples", written over a horizontal line.
Kelly Samples

ENCO LABORATORIES

REPORT #	:	ORL40561
DATE REPORTED	:	JANUARY 13, 2006
REFERENCE	:	03860-022-01-1000
PROJECT NAME	:	CITRUS CO LF.

RESULTS OF ANALYSIS

STATION NAME	PARAMETER	RESULT	UNITS	METHOD
EQB#1	VINYL CHLORIDE	1.	ug/L	EPA 8260

ENCO LABORATORIES

REPORT #	:	ORL40561
DATE REPORTED	:	JANUARY 13, 2006
REFERENCE	:	03860-022-01-1000
PROJECT NAME	:	CITRUS CO LF.

RESULTS OF ANALYSIS

STATION NAME	PARAMETER	RESULT	UNITS	METHOD
MW-15	SPEC COND-FIELD	81	umhos/cm	EPA 120.1
MW-15	PH-FIELD	5.22	S.U.	EPA 150.1
MW-15	TEMP-FIELD	25.1	Deg. C	EPA 170.1
MW-15	TURBIDITY-FIELD	9.85	NTU	EPA 180.1
MW-15	DISSOLVED OXYGEN	.66	mg/L	EPA 360.1
MW-15	VINYL CHLORIDE	<0.5	ug/L	EPA 8260

ENCO LABORATORIES

REPORT #	:	ORL40561
DATE REPORTED	:	JANUARY 13, 2006
REFERENCE	:	03860-022-01-1000
PROJECT NAME	:	CITRUS CO LF.

RESULTS OF ANALYSIS

STATION NAME	PARAMETER	RESULT	UNITS	METHOD
TB#1	VINYL CHLORIDE	<0.5	ug/L	EPA 8260

ENCO LABORATORIES

REPORT # : ORL40561
DATE REPORTED: January 13, 2006
REFERENCE : CITRUS CO.
PROJECT NAME : 03860-022-01-1000

PAGE 1 OF 3

RESULTS OF ANALYSIS

EPA METHOD 8260 -
VOLATILE ORGANICS

Vinyl Chloride

LAB BLANK

0.5 U

Units

ug/L

Surrogate:

Bromofluorobenzene

Date Analyzed

% RECOV

93

01/09/06 15:32

LIMITS

52-167

U = Compound was analyzed for but not detected to the level shown.

ENCO LABORATORIES

REPORT # : ORL40561

DATE REPORTED: January 13, 2006

REFERENCE : CITRUS CO.

PROJECT NAME : 03860-022-01-1000

PAGE 2 OF 3

LABORATORY CERTIFICATIONS

Laboratory Certification: NELAC:E83182

All analyses reported with this project were analyzed by the facility indicated unless identified below.

ENCO LABORATORIES

REPORT # : ORL40561

DATE REPORTED: January 13, 2006

REFERENCE : CITRUS CO.

PROJECT NAME : 03860-022-01-1000

PAGE 3 OF 3

QUALITY CONTROL DATA

<u>Parameter</u>	<u>% RECOVERY</u> <u>LCS/MS/MSD</u>	<u>LCS</u> <u>LIMITS</u>	<u>MS/MSD</u> <u>LIMITS</u>	<u>RPD</u> <u>MS/MSD</u>	<u>RPD</u> <u>LIMITS</u>
EPA Method 8260					
1,1-Dichloroethene	131/132/141	49-156	36-185	6	34
Benzene	118/111/116	64-132	65-143	4	25
Trichloroethene	103/103/105	66-130	51-152	2	28
Toluene	98/ 95/ 98	58-132	62-144	3	24
Chlorobenzene	92/ 94/ 97	68-135	64-140	3	23

< = Less Than

MS = Matrix Spike

MSD = Matrix Spike Duplicate

LCS = Laboratory Control Standard

RPD = Relative Percent Difference

Environmental Conservation Laboratories, Inc.

Login Sample Disposition Form

Client Name: TEA

Login #: ORL40561

Proj. Name: CITRUS Co. LF

Date Rec'd: 1/6/06 Logged By: JF

Samples received via:

Client Drop-off

Lab Pickup

Courier

Greyhound
LIST AND ATTACH BILLS

Container Descriptions and Preservation

Indicate presv. type and # of each

Containers	None	HCl	HNO ₃	H ₂ SO ₄	NaOH	Other
1 L Glass						
1 L Plastic						
500 ml Plastic						
250 ml Plastic						
250 ml Glass						
4 oz Jars						
40 ml Vial		<u>6</u>				
Other						

Receiving Temperatures

Total Number of Coolers: 1

Cooler Number	Receipt Temperature		
<u>L40</u> <u>2</u>	<u>2-6°</u>	<u>On Ice</u>	No Ice
	2-6°	On Ice	No Ice
	2-6°	On Ice	No Ice
	2-6°	On Ice	No Ice
	2-6°	On Ice	No Ice
	2-6°	On Ice	No Ice
	2-6°	On Ice	No Ice

Provide details of "No Ice" in Notification/Comments.

Sample Receipt Disposition

- | | | | |
|--|------------|-----------|------------|
| 1. Were sample containers received intact? | <u>Yes</u> | No | |
| 2. Were sample containers properly preserved? | <u>Yes</u> | No | |
| 3. Were proper containers used for analyses requested? | <u>Yes</u> | No | |
| 4. Do sample labels match Chain-of-Custody record? | <u>Yes</u> | No | |
| 5. Were samples received under custody seal? | <u>Yes</u> | No | |
| 6. If received under custody seal, were all seals intact? | <u>Yes</u> | No | N/A |
| 7. Were volatile containers preserved (check labels only)? | <u>Yes</u> | No | N/A |
| 8. Were aqueous volatile samples headspace-free? | Yes | <u>No</u> | N/A |
| 9. Were aqueous samples checked for residual chlorine? | Yes | No | <u>N/A</u> |
| 10. Were all samples specified in the prelog received? | <u>Yes</u> | No | N/A |

Any discrepancies must be noted below and approved by lab management.

Client Notification

- Does client need to be notified? Yes No
- Who notified client? _____
- Who was notified? _____
- When? _____ by: _____ Phone _____ Fax _____ Mail _____
- Client requests following action(s) be taken:
 - _____ Continue analysis and report disposition in final report.
 - _____ Cancel affected analyses only (identify in comments below).
 - _____ Cancel all analyses.
 - _____ Other (explain in comments below).

Comments TRIPS have 7 per size

Project Status

☒ Samples received into lab.
☐ Samples rejected

KJS 1/6/06
APPROVED BY DATE



ENVIRONMENTAL CONSERVATION LABORATORIES

QSARF # P27957

4810 Executive Park Court, Suite 211
Jacksonville, Florida 32216-6069
Ph. (904) 296-3007 • Fax (904) 296-6210

10775 Central Port Drive
Orlando, Florida 32824
Ph. (407) 826-5314 • Fax (407) 850-6945

1015 Passport Way
Cary, North Carolina 27513
Ph. (919) 677-1669 • Fax (919) 677-9846

ENCO CompQAP No.: 960038G/0

CHAIN OF CUSTODY RECORD

PROJECT REFERENCE		PROJECT NO.		P.O. NUMBER		MATRIX TYPE		REQUIRED ANALYSIS		PAGE 1 OF 1							
Citrus Co. LF		03860-022-01		1000													
PROJECT LOC. (State)	SAMPLER(S) NAME		PHONE		FAX												
	DAN Lichtenwaller		(352) 377-5821														
CLIENT NAME		CLIENT PROJECT MANAGER															
Jones, Edmunds + Assoc.		J. Locklear															
CLIENT ADDRESS (CITY, STATE, ZIP)																	
730 NE Waldo Rd Gville, FL 32641																	
SAMPLE																	
STATION	DATE	TIME	GRAB	COMP	SAMPLE IDENTIFICATION	SURFACE WATER	GROUND WATER	WASTEWATER	DRINKING WATER	SOIL/SOLID/SEDIMENT	NONAQUEOUS LIQUID (oil, solvent, etc.)	AIR	SLUDGE	OTHER	PRESERVATIVE	NUMBER OF CONTAINERS SUBMITTED	REMARKS
EQB#1	1/5/05	0806	✓		CCIR-EQ1								✓			2	EQ Blank
MW-15	↓	0850	✓		CCIR-15	✓										2	
TB#1	↓												✓			2	Trip Blank
4																	
5																	
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	
SAMPLE KIT PREPARED BY:		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME						
CJACKSONVILLE		12/20/05	16:30	Lisa Ponte		12/20/05	16:30										
RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME						
				Dan Lichtenwaller		1/4/05	1442										
RECEIVED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME						
				Dan Lichtenwaller		1/5/05	1130										
RECEIVED FOR LABORATORY BY: (SIGNATURE)		DATE	TIME	CUSTODY INTACT		ENCO LOG NO.		REMARKS									
K. Casey		1/6/06	10:50	YES		ORL40561		Shipped Greyhound from Gainesville to Orlando									

Environmental Conservation Laboratories, Inc.

10775 Central Port Drive

Orlando FL, 32824

Phone: 407.826.5314 FAX: 407.850.6945



February 14, 2006

Jones Edmunds & Associates, Inc. (JO006)

Attn: J. Locklear

730 N.E. Waldo Road Bldg. A

Gainesville, FL 32641

**RE: Project Number: 03860-022-01, Project Name/Desc: Citrus Co. LF
ENCO Workorder: A600411**

Dear J. Locklear,

Enclosed is a copy of your laboratory report for test samples received by our laboratory on
1/28/06 10:00:00AM.

Unless otherwise noted in an attached project narrative, all samples were received in acceptable
condition and processed in accordance with the referenced methods/procedures. Results for
these procedures apply only to the samples as submitted.

This data has been produced in accordance with NELAC standards (June, 2003). This report
shall not be reproduced except in full, without the written approval of the Laboratory.

If you have any questions or require further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly Samples", is written over a horizontal line.

Kelly Samples
Project Manager

Enclosure(s)

ENCO LABORATORIES

REPORT # : A600411
DATE REPORTED : 2/14/2006
REFERENCE : 03860-022-01
PROJECT NAME : Citrus Co. LF Resample

RESULTS OF ANALYSIS

STATION NAME	PARAMETER	RESULT	UNITS	METHOD
MW-15	Vinyl chloride	1	ug/L	EPA 624
MW-15	Dissolved Oxygen	0.29	mg/L	Field
MW-15	pH	4.93	pH Units	Field
MW-15	Specific Conductance (EC)	61	umhos/cm	Field
MW-15	Temperature	25.31	°C	Field
MW-15	Turbidity	2.38	NTU	Field

FEB-14-2006 09:09 FROM:

TO: 13523773166

P.5/10

ENCO LABORATORIES

REPORT # : A600411
DATE REPORTED : 2/14/2006
REFERENCE : 03860-022-01
PROJECT NAME : Citrus Co. LF Resample

RESULTS OF ANALYSIS

STATION NAME	PARAMETER	RESULT	UNITS	METHOD
TB#3	Vinyl chloride	<0.5	ug/L	EPA 624



QUALITY CONTROL

Analyte	Result	MRL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----	-------	-------------	---------------	------	-------------	-----	-----------	-------

Volatile Organic Compounds by GCMS - Quality Control

Batch 6B01010 - EPA 5030B_MS

Blank (6B01010-BLK1)

Prepared & Analyzed: 01-Feb-06

1,1,1-Trichloroethane	0.2 U	1	ug/L							
1,1,2,2-Tetrachloroethane	0.2 U	0.2	ug/L							
1,1,2-Trichloroethane	0.4 U	1	ug/L							
1,1-Dichloroethane	0.3 U	1	ug/L							
1,1-Dichloroethene	0.8 U	1	ug/L							
1,2-Dichlorobenzene	0.3 U	1	ug/L							
1,2-Dichloroethane	0.3 U	1	ug/L							
1,2-Dichloropropane	0.2 U	1	ug/L							
1,3-Dichlorobenzene	0.2 U	1	ug/L							
1,4-Dichlorobenzene	0.2 U	1	ug/L							
Bromodichloromethane	0.2 U	0.4	ug/L							
Bromoform	0.5 U	1	ug/L							
Bromomethane	1 U	1	ug/L							
Carbon tetrachloride	0.2 U	1	ug/L							
Chlorobenzene	0.1 U	1	ug/L							
Chloroethane	0.5 U	1	ug/L							
Chloroform	0.2 U	1	ug/L							
Chloromethane	0.6 U	1	ug/L							
cis-1,2-Dichloroethene	0.3 U	1	ug/L							
cis-1,3-Dichloropropene	0.1 U	0.2	ug/L							
Dibromochloromethane	0.2 U	0.2	ug/L							
Dichlorodifluoromethane	0.5 U	1	ug/L							
Methylene chloride	1 U	2	ug/L							
Tetrachloroethene	0.6 U	1	ug/L							
trans-1,2-Dichloroethene	0.8 U	1	ug/L							
trans-1,3-Dichloropropene	0.2 U	0.2	ug/L							
Trichloroethene	0.3 U	1	ug/L							
Trichlorofluoromethane	0.7 U	1	ug/L							
Vinyl chloride	0.5 U	1	ug/L							

Surrogate: Toluene-d8

60.6

ug/L

50.0

121

70-132

Surrogate: 4-Bromofluorobenzene

54.0

ug/L

50.0

108

60-135

Surrogate: 1,2-Dichloroethane-d4

0.00

ug/L

50.0

50-150

S-GC, 1

LCS (6B01010-BS1)

Prepared & Analyzed: 01-Feb-06

1,1-Dichloroethene	26.8	1	ug/L	20.0		134	49-156			
Chlorobenzene	18.7	1	ug/L	20.0		94	68-135			
Trichloroethene	20.3	1	ug/L	20.0		102	66-130			

Surrogate: Toluene-d8

61.5

ug/L

50.0

123

70-132

Surrogate: 4-Bromofluorobenzene

49.8

ug/L

50.0

100

60-135

Surrogate: 1,2-Dichloroethane-d4

0.00

ug/L

50.0

50-150

S-GC, 1

Matrix Spike (6B01010-MS1)

Source: A600288-08

Prepared & Analyzed: 01-Feb-06

1,1-Dichloroethene	25.5	1	ug/L	20.0	0.8 U	128	36-185			
Chlorobenzene	19.8	1	ug/L	20.0	0.1 U	99	64-140			
Trichloroethene	19.4	1	ug/L	20.0	0.3 U	97	51-152			



www.encolabs.com

QUALITY CONTROL

Analyte	Result	MRL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----	-------	-------------	---------------	------	-------------	-----	-----------	-------

Volatile Organic Compounds by GCMS - Quality Control

Batch 6B01010 - EPA 5030B_MS

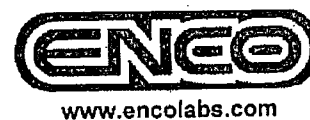
Matrix Spike (6B01010-MS1) Continued Source: A600288-08 Prepared & Analyzed: 01-Feb-06

Surrogate: Toluene-d8	60.8		ug/L	50.0		122	70-132			
Surrogate: 4-Bromofluorobenzene	55.8		ug/L	50.0		112	60-135			
Surrogate: 1,2-Dichloroethane-d4	0.00		ug/L	50.0			50-150			S-GC, 1

Matrix Spike Dup (6B01010-MSD1) Source: A600288-08 Prepared & Analyzed: 01-Feb-06

1,1-Dichloroethene	25.8	1	ug/L	20.0	0.8 U	129	36-185	1	34	
Chlorobenzene	19.4	1	ug/L	20.0	0.1 U	97	64-140	2	23	
Trichloroethene	19.2	1	ug/L	20.0	0.3 U	96	51-152	1	28	

Surrogate: Toluene-d8	61.4		ug/L	50.0		123	70-132			
Surrogate: 4-Bromofluorobenzene	53.8		ug/L	50.0		108	60-135			
Surrogate: 1,2-Dichloroethane-d4	0.00		ug/L	50.0			50-150			S-GC, 1



Notes and Definitions

- U Analyte included in the analysis, but not detected
- S-GC Surrogate recovery outside of control limits. The data was accepted based on valid recovery of the remaining surrogate.
- I Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).



ENVIRONMENTAL CONSERVATION LABORATORIES

QSARF # _____

 4810 Executive Park Court, Suite 211
 Jacksonville, Florida 32216-6069
 Ph. (904) 296-3007 • Fax (904) 296-6210

 10775 Central Port Drive
 Orlando, Florida 32824
 Ph. (407) 826-5314 • Fax (407) 850-6945

 1015 Passport Way
 Cary, North Carolina 27513
 Ph. (919) 677-1669 • Fax (919) 677-9846

ENCO CompQAP No.: 960038G/0

CHAIN OF CUSTODY RECORD

PROJECT REFERENCE Citrus Co. LF		PROJECT NO. 03860-022-01		P.O. NUMBER		MATRIX TYPE		REQUIRED ANALYSIS		PAGE 1 OF 1	
PROJECT LOC. (State) FL		SAMPLER(S) NAME DAN Lichtenwalter		PHONE (904) 377-5821		FAX		<input checked="" type="checkbox"/> STANDARD REPORT DELIVERY <input type="checkbox"/> EXPEDITED REPORT DELIVERY (surcharge) Date Due: _____			
CLIENT NAME Jones, Edmunds + Assoc.		CLIENT PROJECT MANAGER J. Locklear									
CLIENT ADDRESS (CITY, STATE, ZIP) 730 NE Waldo Rd Gville, FL 32641											
SAMPLE		STATION		DATE	TIME	GRAB	COMP	SAMPLE IDENTIFICATION		REMARKS	
		MW-15		1/27/06	0827	✓		CCIO5R2-15		RESAMPLE 1	
		TB#3		1							
		3									
		4								* Note: Used	
		5								the same	
		6								equipment	
		7								covered by	
		8								EQB #3 on	
		9								1/26/06	
		10									
		11									
		12									
		13									
		14									
SAMPLE KIT PREPARED BY:		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME
<input type="checkbox"/> JACKSONVILLE <input type="checkbox"/> ORLANDO						1/24/06	1630				
RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME
						1/27/06	1815				
RECEIVED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME
RECEIVED FOR LABORATORY BY: (SIGNATURE)		DATE	TIME	CUSTODY INTACT		ENCO LOG NO.		REMARKS			
<input type="checkbox"/> Jacksonville <input checked="" type="checkbox"/> Orlando		1/28/06	10:30	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		A600411		Shipped Greyhound from Gainesville to Orlando			

Watson, Stephanie M.

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, February 06, 2006 11:10 AM
To: Morgan, Steve
Cc: Watson, Stephanie M.; mouselk@doacs.state.fl.us; jlocklear@jonesedmunds.com; DPenoyer@SCSEngineers.com; JBanks@SCSEngineers.com
Subject: Eagle nest exclusion zone/

Steve,

We have been informed by Division of Forestry that there is an eagle's nest near the landfill. We were aware of this fact, but were not aware until very recently that this might impact our use of the proposed sublease expansion area. During the nesting season (October 1 through May 31 or so) we will be required not to enter the nest exclusion zone. This will impact testing of the gas probes installed as part of the response to the Consent Agreement. It appears that GP-14 and GP-15 are within the exclusion zone.

According to Forestry, we may be able to accomplish an entry under the following conditions: a trained monitor can accompany the field personnel during the sampling event; the monitor observes the nest and nesting behavior; if any disturbance occurs, the entry to the exclusion zone must be terminated immediately. If no disturbance is observed, the sampling can continue. This would impact 3 of the 4 proposed quarterly gas monitoring events.

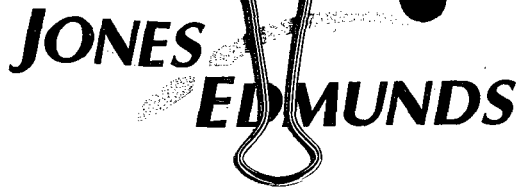
This exclusion zone will also require that access to GP-5 through GP-13 be from the north and west around the closed site and that access to GP-16 through GP-18 be from the north on the east side of the active landfill. Those limits to access are workable. There is no impact on the groundwater monitoring program.

We propose to request a monitor from Forestry (or FWC?) for the sampling events that are during the nesting season. Further we propose to sample GP-14 and GP-15 only if entry can be accomplished without violating the limits established by the wildlife protection rules. Is this something that can be approved?

Please indicate what format you need for the "formal" request. Thanks.
Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division
P.O. Box 340
Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax



FILE

submittal in
enforcement
hanging file

February 3, 2006

Ms Stephanie M. Watson
Florida Department of Environmental Protection – Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33169

RE: Supplemental Information and Resampling Date for MW-15
Citrus County Central Landfill Groundwater Investigation
Jones Edmunds Project No.: 03860-021-01-1000

FEB 06 2006

Dear Ms Watson:

Following the results of the Citrus County Central Landfill Groundwater Investigation Sampling Event of November 2005, the determination was made to re-sample MW-15 for Vinyl Chloride.

A limited re-sampling was conducted on January 5, 2006. The results of the re-sampling reported Vinyl Chloride below the Laboratory Detection Limit in MW-15 but at the Groundwater Standard of 1 ug/L in the Equipment Blank. The laboratory was unable to determine whether or not sample containers of the Equipment Blank and MW-15 had been switched in the laboratory.

Based on the nature of the Resampling results, a second Resampling of MW-15 was conducted for Vinyl Chloride on January 27, 2006. The results of that Resampling will be forwarded under separate cover by February 17, 2006.

Also included in this submission are two complete copies of analytical data from the November 2005 sampling event for inclusion into the Groundwater Investigation Report submitted in January 2006.

If you have any questions regarding this information, please contact us at (352) 377-5821.

Sincerely,

John D. Locklear
Project Manager

X:\03860-CitrusCo\021-01.GroundwaterInvestigation\2006.02.03_LTR_Watson_DEP_SupplementalInfo.andResamplingDataforMW-15.doc

xc: Susan Metcalfe, P.G.

Attachments

730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352-377.3166 Fax
www.jonesedmunds.com

Watson, Stephanie M.

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Friday, February 03, 2006 11:59 AM
To: Watson, Stephanie M.
Cc: Morris, John R.; Morgan, Steve; jlocklear@jonesedmunds.com
Subject: Request for Information re: Groundwater Investigation Report

Stephanie,
John Locklear at JEA will have that information delivered to your office on Monday February 6. The resampling event data had a problem with the blank. Therefore we have repeated that event. The delivery date for the second resampling will be included in the information you receive.
Susie

>>> "Watson, Stephanie M." <Stephanie.M.Watson@dep.state.fl.us> 02/03/2006 11:22 AM >>>
Hi Susie,

We received the Groundwater Investigation Report on January 4, 2006. Section 3.2 states "Groundwater analytical data are provided in Appendix H." However, Appendix H appears to be limited to summary tables.

Would you please forward a copy of the laboratory's analytical report for the November 2005 sampling event to my attention? It may be submitted as "Amendment to Appendix H" so the Table of Contents do not have to be changed.

Also, the first recommendation in Section 4.0 referenced re-sampling at MW-15 and indicated that results would be provided to the Department no later than January 30, 2006. Could you update us on the status of these sampling results?

Thank you,
Stephanie

Stephanie (Petro) Watson, FDEP SW District Office, Solid Waste Section
Telephone: 813-632-7600, ext. 451 (SunCom 514-9155, ext. 451)
Facsimile: 813-632-7664 (SunCom fax 514-9219); E-mail:
<mailto:stephanie.m.watson@dep.state.fl.us>
stephanie.m.watson@dep.state.fl.us

Watson, Stephanie M.

From: Watson, Stephanie M.
Sent: Thursday, February 02, 2006 11:24 AM
To: Susie Metcalfe (E-mail 2)
Cc: Morgan, Steve
Subject: RE: Response to CA time extension request beyond February 3, 2006



Extension
approval.02-1-06.sw..

Hi Susie,

I have attached a copy of the Department's approval letter of the County's December 28, 2005 request for an extension. This letter is going out in today's mail.

Stephanie

Stephanie (Petro) Watson, FDEP SW District Office, Solid Waste Section
Telephone: 813-632-7600, ext. 451 (SunCom 514-9155, ext. 451)
Facsimile: 813-632-7664 (SunCom fax 514-9219); E-mail: stephanie.m.watson@dep.state.fl.us
<mailto:stephanie.m.watson@dep.state.fl.us>

-----Original Message-----

From: Morgan, Steve
Sent: Thursday, February 02, 2006 11:08 AM
To: Watson, Stephanie M.
Subject: FW: Response to CA time extension request beyond February 3, 2006

Stephanie:

Please send Susan Metcalfe a copy of the extension letter that went out today.

Steve

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Monday, January 30, 2006 4:46 PM
To: Morgan, Steve; Pelz, Susan
Cc: Glenn Mcracken
Subject: Response to CA time extension request beyond February 3, 2006

Susan - if you are still at DEP

Steve - if you are handling this project now.

The County submitted a letter dated December 28, 2005 requesting an extension of the February 3, 2006 deadline (by 60 days) for obtaining the sublease from Division of Forestry and State Lands. We have not received a response as yet. Has one been prepared?

We continue to make progress with this Consent Agreement requirement. The County submitted the document to Forestry on January 17 that includes the AK #, legal description, official record book location and size of each of the 42 parcels that are being offered to the state in exchange for the sublease. The total area is 31.49 acres. They are proceeding to take this offer to State Lands to make the exchange official. We have not heard details of that process.

Thank you for your attention to this matter.

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division
P.O. Box 340
Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax

Memorandum

Florida Department of
Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

W
TO: ☒ Deborah A. Getzoff, Director of District Management
☐ James Cleary, Asst. Director of District Management
☐ William Kutash, Program Administrator
☐ OGC

FROM/THROUGH: *WKC* William Kutash, Environmental Administrator
Steve Morgan, Interim Solid Waste Manager
Stephanie Watson, Environmental Specialist III

2/1/06
2/1/06

DATE: February 1, 2006

FILE NAME: Citrus County Central Class I and Closed Class I Landfills OGC FILE# 05-1078
PROGRAM: Solid Waste COUNTY: Citrus

TYPE OF DOCUMENT:

WARNING ☐ FINAL ORDER ☐ CASE REPORT ☐
DRAFT ☐ OR FINAL ☐ NOV ☐ CONSENT ORDER ☐
PENALTY AUTHORIZATION ☐ EXTENSION REQUEST APPROVAL ☒

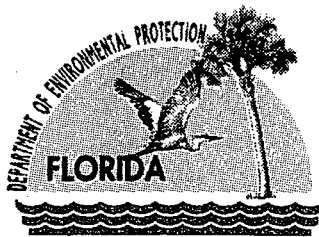
BRIEF DESCRIPTION: Citrus County BOCC's request for an extension of the deadline for compliance with paragraphs 10, 11.a., 11.b., 11.c., 12.a., and 12.b. of the Consent Agreement, per paragraph 16.

PENALTY SUMMARY:

ELRA PENALTY

EXTENT OF DEVIATION: ☐ POTENTIAL FOR HARM: ☐
PENALTY AMOUNT: ☐ COST AND EXPENSES: \$3,000

TOTAL PENALTY AMOUNT: \$3,000 APPROVED BY SECRETARY: N/A



Jeb Bush
Governor

Department of Environmental Protection

290592

Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

February 2, 2006

Chairman Gary Bartell
Citrus County Board of County Commissioners
110 North Apopka Avenue
Inverness, FL 34450

RE: Approval of Request for 60-Day Extension of Deadlines in Consent Agreement per Paragraph 16
Consent Agreement, OGC Case #05-1078

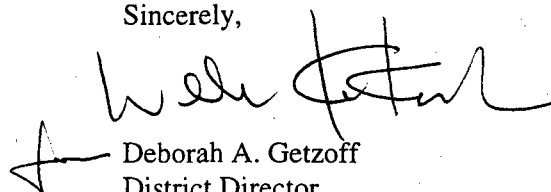
Dear Chairman Bartell:

The Department received the Citrus County Board of County Commissioners' (BOCC) January 5, 2006 (dated December 28, 2005) request for a 60-day extension of the February 3, 2006 deadline for compliance with paragraphs 10, 11 a., 11.b., 11.c., 12.a., and 12.b. of the Consent Agreement. The County requested this extension, per paragraph 16 of the Consent Agreement, because "the activities and schedules of state agencies (Division of Forestry) are not within the control of the County..."

The Department does not object to the BOCC's request. The deadline to comply with paragraphs 10, 11 a., 11.b., 11.c., 12.a., and 12.b. of the Consent Agreement was extended to February 3, 2006 by the Department's December 21, 2005 letter to the BOCC. Therefore, the new deadline to comply with paragraphs 10, 11 a., 11.b., 11.c., 12.a., and 12.b. is **April 4, 2006**.

If you have any questions, please feel free to contact me at (813) 632-7600 x 352, Steve Morgan, Interim Solid Waste Program Manager, at (813) 632-7600 x 385, or Stephanie Watson at (813) 632-7600 x 451.

Sincerely,


Deborah A. Getzoff
District Director
Southwest District

dag/sw

cc: Glenn McCracken, Citrus County Public Works Director
Richard Wm. Wesch, Citrus County Administrator
Susan Metcalfe, Citrus County Solid Waste Management Division Director
William Kutash, Waste Program Administrator, FDEP Tampa
Steve Morgan, FDEP Tampa
Stephanie Watson, FDEP Tampa

"More Protection, Less Process"

Printed on recycled paper.

Watson, Stephanie M.

From: Morris, John R.
Sent: Monday, January 16, 2006 12:22 PM
To: Pelz, Susan; Morgan, Steve; Watson, Stephanie M.; Galbraith, Bret
Subject: FW: Eagle nest in Citrus near the landfill



Eagle nest in Citrus
near the ...

FYI.

Our new office is located at 13051 N. Telecom Pkwy., Temple Terrace, FL 33637-0926.

John R. Morris, P.G., FDEP SW District Office, Solid Waste Section

Telephone: 813-632-7600, ext. 336; suncom 514-9155, ext. 336

Facsimile: 813-632-7664; E-mail: john.r.morris@dep.state.fl.us

-----Original Message-----

From: Susan Metcalfe [mailto:Susan.Metcalfe@bocc.citrus.fl.us]

Sent: Friday, January 13, 2006 5:12 PM

To: Morris, John R.; jlocklear@jonesedmunds.com;

DPenoyer@SCSEngineers.com

Subject: Fwd: Eagle nest in Citrus near the landfill

I just got this from Forestry. Let's discuss how this may impact sampling activities or further investigations.

Watson, Stephanie M.

From: Morris, Vincent [morrisv@doacs.state.fl.us]
Sent: Friday, January 13, 2006 4:55 PM
To: susan.metcalfe@bocc.citrus.fl.us
Cc: Werner, Colleen
Subject: Eagle nest in Citrus near the landfill

Susan,

The eagle nest near the landfill requires protection during the nesting season. The nesting season occurs between October 1st through May 15th. During this time period we must keep all people and equipment out of the primary zone which is a 750' radius of the nest. If it is determined that the nest is inactive, or if the eagles are not present using the nest, then this primary zone can be entered.

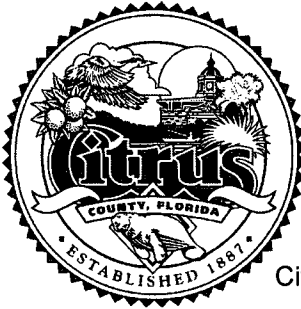
The location is 82 degrees 26.10 minutes south, 28 degrees 50.80 minutes east. The state designated number for the nest is Citrus 036.

Since the landfill is probably the primary foraging zone for the eagle we would have to assume that equipment within the landfill site would not constitute a disturbance to the nest even if it falls within the primary zone.

If someone must enter this zone during the nesting season, it would be necessary to include a biologist who can observe the eagles to determine if the eagles are being disturbed. If they are being disturbed then the offending activity must be discontinued to avoid an illegal "take".

If you have questions about this matter, please feel free to call me or Colleen Werner at this office.

Vincent Morris
Ecology Unit Leader
Withlacoochee State Forest
15019 Broad Street
Brooksville, FL 34601
(352) 754-6777 ext. 129
morrisv@doacs.state.fl.us



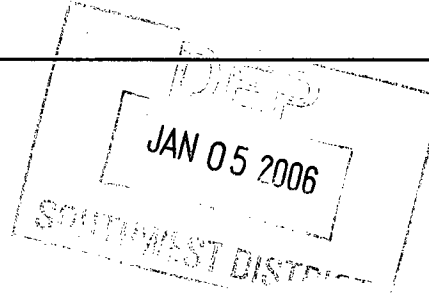
Board of County Commissioners
DEPARTMENT OF PUBLIC WORKS
SOLID WASTE MANAGEMENT DIVISION

P.O. Box 340, Lecanto, Florida 34460
Telephone: (352) 527-7670 FAX: (352) 527-7672
email: landfillinfo@bocc.citrus.fl.us
TDD Telephone: (352) 527-5303
Citrus Springs/Dunnellon/Inglis/Yankeetown area Toll Free (352) 489-2120

sw 11/10/06
290592

December 28, 2005

Susan J. Pelz, P.E.
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926



Re: Citrus County Central Landfill
Permit No. 21375-008-SO/01
Consent Agreement OGC File No. 05-1078

Dear Ms. Pelz:

The County has received the Department's letter dated December 21 which was prepared in response to the County's November 30 request to extend the deadline for certain Consent Agreement activities by 30 days. Accordingly, we understand that the revised deadlines apply to Paragraph 10, Paragraphs 11 a, b, and c and Paragraph 12 a and b.

Following our letter of November 30, the Division of Forestry submitted their request to you which included a 90-day extension to the original 90-day timetable. Please consider this their best estimate of the time for Forestry to complete the required process. Because the activities and schedules of state agencies are not within the control of the County, we are requesting an extension to the Consent Agreement timetable of 60 additional days. This corresponds to the Forestry request. This request is being submitted as allowed by Paragraph 16 of the Consent Agreement. Please indicate in your response to which requirements any extension that is granted applies.

Thank you for your consideration of this request. Progress is still being made between the County and Forestry. The initial reports of investigation will be submitted for your review in accordance with the January 4 2006 timetable.

Yours truly,

Susan Metcalfe, P.G.
Director

SM

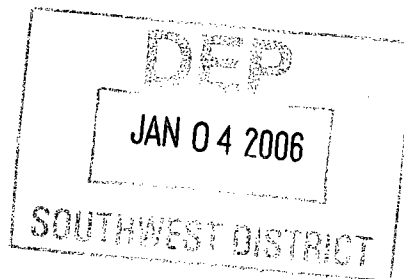
CC: Glenn McCracken, Director, Public Works Department
Richard Wm. Wesch, County Administrator
Gary Bartell, Chairman, BOCC
John Banks, SCS Engineers, Tampa
John Locklear, JEA, Gainesville



Rec'd K

January 4, 2006

Deborah A. Getzoff
District Director
Southwest District
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619



Re: Consent Agreement OGC Case No. 05-1078
Citrus County Central Landfill Class I and Closed Class I Landfill
Groundwater Investigation Report

Dear Ms. Getzoff:

Enclosed please find two copies of the Groundwater Investigation Report for the above referenced facility as required by Paragraph 8 of the Consent Agreement. The report was prepared by Jones, Edmunds and Associates, Inc. on behalf of the Citrus County Board of County Commissioners.

Sincerely,

A handwritten signature in black ink, appearing to read 'John D. Locklear'.

John Locklear
Project Manager

xc: Susan Metcalfe, Citrus County
Glenn McCracken, Citrus County

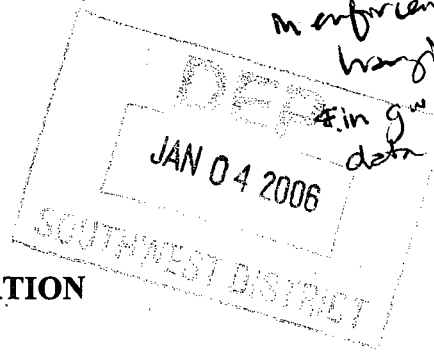
730 NE Waldo Rd
Gainesville, FL 32641

352.377.5821 Phone
352.377.3166 Fax
www.jonesedmunds.com

290592
enforcement
file copy

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in gw mon
data file

**CITRUS COUNTY
CENTRAL LANDFILL
GROUNDWATER INVESTIGATION
REPORT**



Prepared for:

CITRUS COUNTY BOARD OF COUNTY COMMISSIONERS

Prepared by:

JONES EDMUNDS & ASSOCIATES, INC.
730 NE Waldo Road
Gainesville, Florida 32641

P.E. Certificate of Authorization #1841
P.G. Certificate of Authorization #133

January 2006

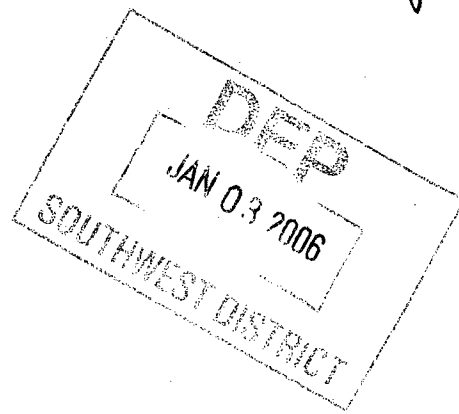
Allan H. Biddlecomb, P.G.
Florida P.G. No. 0001258

1/3/06

813-621-0080
FAX 813-623-6757

If enclosures are not as noted, kindly notify us at once.

290592
enforcement
file copy



**LANDFILL GAS MONITORING PROBES INSTALLATION
CONSTRUCTION CERTIFICATION REPORT
CITRUS COUNTY CENTRAL LANDFILL
PERMIT NO. 21375-008-SO/01**

Prepared for:

Citrus County Solid Waste Management Division
P.O. Box 340
Lecanto, Florida 34460
(352) 527-7670

Prepared by:

SCS Engineers
3012 U.S. Highway 301 North, Suite 700
Tampa, Florida 33619
(813) 621-0080
Fax: (813) 623-6757

Florida Board of Professional Engineers
Certificate No. 00004892

January 3, 2006
File No. 09204067.01

Dis. Ranger
NO. 56065
1/3/06