

NOTICE OF MEETING

Today's date: 10/22/92 Writer: MORBAN

Date of meeting: 10/29/92

Time: 2 PM

Place: WASTE MGMT  
CONF ROOM

Subject: CITRUS COUNTY LANDFILL WARNING NOTICE

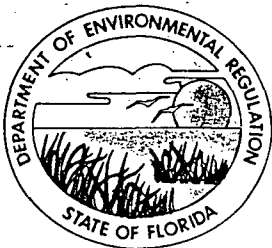
Explanation: SEE ATTACHED CORRESPONDENCE ARRANGED CHRONOLOGICALLY -  
INFO FOR THIS MEETING. RJ

Requested by: CITRUS COUNTY Ph.# \_\_\_\_\_

Names of attendees other than DER: ANTHONY S. HOSMAKOR, COUNTY ADM - JAMES PINKERTON - DIR. TECHNICAL SERVICES  
LARRY HAAG - COUNTY ATTY

Local Program notified: ☒ yes ☐ no Attending? \_\_\_\_\_

Copies to anticipated in-house attendees:	<u>GARRITY</u>	Information copies to:
	<u>KUTASIT</u>	_____
	<u>BOWRA</u>	_____
	<u>MORBAN</u>	_____
	<u>FORD</u>	_____
	_____	_____



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Anthony Shoemaker, County Administrator  
Citrus County Board of County Commissioners  
110 North Apopka Avenue  
Inverness, FL 32650

WARNING LETTER #WL92-0019SW09SWD

Subject: Citrus County Central Landfill, Permit #S009-187229

Dear Mr. Shoemaker:

A site inspection of the facility on October 8, 1992 indicates that you may be in violation of Chapter 403, Florida Statutes, and the rules promulgated thereunder. Department personnel observed the following at your above described facility:

1. Heavy rains on October 3 and 4 caused large quantities of leachate to be generated and to discharge out of the waste disposal area over the north side of the existing liner to an unlined area and caused failure of both the leachate and stormwater pump stations. The county was using portable pumps to pump leachate from the unlined area into the stormwater drainage ditch on the west side of the lined cell which drains into the stormwater detention area on the south side of the lined cell. Pumping of leachate in this manner had occurred for several days.
2. The county is required by permit condition to notify the Department when landfill operation system failure occurs. The county did not notify the Department of these problems occurring at the landfill and as a result, may have created other violations.

It is a violation of Rule 17-4.030, Florida Administrative Code and Sections 403.161(1)(b) and 403.087, Florida Statutes, for any facility that can reasonably be expected to be a source of pollution to operate without an appropriate and valid permit issued by the Department. Also, a facility that causes or allows the disposal of pollutant materials onto the ground may be in violation of Sections 376.302, and 403.088, Florida Statutes and 17-3.404, Florida Administrative Code, if the disposal results in a discharge to groundwater.

You are advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of state statutes or rules may result in liability for

damages and restoration, and the judicial imposition of civil penalties up to \$10,000 per violation per day pursuant to Sections 403.141 and 403.161, Florida Statutes. It is the Department's policy to seek civil penalties for the above described violations in the amount of \$52,600.00.

You are requested to contact Steve Morgan of this office at (813) 744-6100, ext. 385, within 15 days of receipt of this Warning Letter to arrange a meeting with Department personnel to discuss the issues raised in this Warning Letter. You may wish to consult an attorney and to have the attorney attend the meeting with the Department.

PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. If the Department determines that an enforcement proceeding should be initiated in this case, it may be initiated by issuing a Notice of Violation or by filing a judicial action in accordance with Section 403.121, Florida Statutes. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation. The Department can also resolve any violation through entry into a Consent Order.

Sincerely,

Richard D. Garrity, Ph.D.  
Director of District Management  
Southwest District

RDG/sms

cc: Robert Butera, P.E. - FDER Tampa  
James Pinkerton, Director, Dept. of Technical Services  
Chester White Sr., Chairman, Citrus Board of County  
Commissioners

CIVIL PENALTY AUTHORIZATION  
SOUTHWEST DISTRICT

INVESTIGATOR: Steven G. Morgan - Solid Waste  
Compliance/Enforcement Supervisor

DATE SUBMITTED: October 21, 1992

1. VIOLATOR: Citrus County
2. LOCATION OF VIOLATION: Citrus County Class I Landfill,  
S.R. 44, Lecanto, Citrus County
3. NATURE OF VIOLATION:

Citrus County operates a Class I Landfill located on S.R. 44, 3 miles east of Lecanto, Florida. Disposal of Solid Waste is presently occurring in Phase I of the 80 acre disposal cell. Phase I is bottom lined, with lined side slopes on 3 sides. The 80 acre cell is designed to expand toward the north, and therefore there is no lined side slope on the north end of Phase I. Citrus County had experienced continuous problems with stormwater ponding on Phase I but stormwater/leachate ponding had not extended past the north end of Phase I. On Saturday, October 3, 1992, the Landfill received approximately 11.5 inches of rain. The excessive rain caused leachate to run off from the disposal area off the north edge of the liner. The excessive rain also caused failures in both the leachate and stormwater removal systems.

Upon discovery of the problems, Citrus County was required, by conditions of their operation permit, to notify the Department of the failure of the systems and discuss their intentions for corrective action. However, no notification was made to the Department.

On Thursday, October 8, 1992, Department personnel made a routine visit to the Landfill site. This visit revealed that the county was using portable pumps to pump the leachate out of Phase I and into a stormwater drainage ditch on the west side of the cell which eventually routed the leachate into the stormwater detention area on the south side of the site. Landfill personnel indicated that they had been pumping leachate into the stormwater since Monday, October 5. Based on observations made by Department personnel on October 8 and a review of the design of the stormwater management system, the Department estimates that a minimum of 3 million gallons of leachate had been pumped into the stormwater management system. Landfill personnel were instructed to immediately cease pumping leachate into their stormwater system.

4. PENALTY RATIONALE:

- A. Intentional discharge of leachate into the unlined stormwater management system - under Department Solid Waste Penalty Guidelines, failure to maintain leachate collection system so leachate may be discharged is a major potential for harm, and intentional failure to control leachate allowing discharge is a major extent of deviation.

Matrix Range - \$8,000 - \$10,000

Amount chosen - \$10,000

Adjustments - Lack of good faith after discovery: 20% or \$2,000. Citrus County had experienced a similar problem in a previous disposal area and was aware of prohibitions to pumping leachate from a disposal cell to an unlined area.

Multi-Day Penalties - Pumping occurred for 4 days:

Penalty amount x 4

Total Penalty - \$48,000

- B. Failure to notify Department of non-compliance and collection systems failures - A major potential for harm was chosen due to the fact that non-notification has resulted in a major potential for contaminant discharge. A minor extent of deviation was chosen due to the fact that the violation amounted to failure to make a phone call.

Matrix Range - \$4,600 - \$5,999

Amount Chosen - \$4,600

Total Penalty - \$4,600

TOTAL PENALTY FOR ALL VIOLATIONS - \$52,600

5. Penalty recommendation: In recommend that \$52,600 in civil penalties be sought against Citrus County as calculated in the attached penalty worksheet.

Dr. Richard D. Garrity, Ph.D.  
Director of District Management

\_\_\_\_\_  
Approved

\_\_\_\_\_  
Disapproved

\_\_\_\_\_  
Carol M. Browner, Secretary

Date: \_\_\_\_\_

PENALTY COMPUTATION WORKSHEET

Violator's Name: CITRUS COUNTY

Identify Violator's Facility: CITRUS COUNTY CLASS I LANDFILL

Name of Department Staff Responsible for the Penalty Computations:

STEVE MORGAN - SOLID WASTE COMPLIANCE/ENFORCEMENT SUPERVISOR

Date: 10/13/92

PART I - Class B (no penalty) Determination

Rationale for Class B determination: \_\_\_\_\_

PART II - Class A Penalty Determinations

Violation Type	Potential for Harm	Extent of Dev.	Matrix Amount	Multi-day	Adjustments	Total
1. <u>DISCHARGE OF LEACHATE INTO STORMWATER MGMT SYSTEM</u>	<u>MAJOR</u>	<u>MAJOR</u>	<u>\$10,000</u>	<u>X4</u>	<u>20% - \$2000</u>	<u>48,000</u>
2. _____	_____	_____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____	_____	_____
4. <u>FAILURE TO NOTIFY DEPARTMENT OF OPERATION PROBLEMS</u>	<u>MAJOR</u>	<u>MINOR</u>	<u>\$4,600</u>	_____	_____	<u>4,600</u>
5. _____	_____	_____	_____	_____	_____	_____
6. _____	_____	_____	_____	_____	_____	_____
7. _____	_____	_____	_____	_____	_____	_____
8. _____	_____	_____	_____	_____	_____	_____
9. _____	_____	_____	_____	_____	_____	_____

Total Penalties for all Violations: \$52,600

(Attach Part III for each violation for which an adjustment on multi-day penalty is determined.)

PENALTY COMPUTATION WORKSHEET

Part III - Multi-day Penalties and Adjustments

ADJUSTMENTS

Dollar Amount

Good faith/Lack of good faith prior to discovery: \_\_\_\_\_

Justification: \_\_\_\_\_

Good faith/Lack of good faith after discovery: 20% - \$2000

Justification: COUNTY HAD EXPERIENCED IDENTICAL PROBLEM IN 8 ACRE CELL AND WAS AWARE OF PROHIBITIONS TO DISCHARGE WASTE FROM A DISPOSAL AREA

History of non-compliance: \_\_\_\_\_

Justification: \_\_\_\_\_

Economic benefit of non-compliance: \_\_\_\_\_

Justification: \_\_\_\_\_

Ability to pay: \_\_\_\_\_

Justification: \_\_\_\_\_

Total Adjustments: \$2000

MULTI-DAY PENALTIES

Dollar Amount

Number of days adjustment factor(s) to be applied: 4 \$8,000

Justification: COUNTY CONDUCTED PUMPING FOR 4 DAYS DESPITE KNOWLEDGE OF PROHIBITION

Or

Number of days matrix amount is to be multiplied: \$40,000

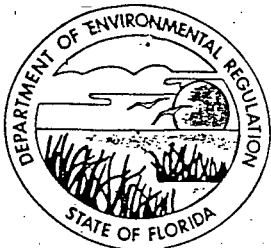
Justification: COUNTY CONDUCTED PUMPING OF LEACHATE FOR 4 DAYS

P 718 865 160  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

Sent to <i>James Pinkerton, Jr.</i>	
Street and No. <i>Citrus City Eng.</i>	
P.O. State and ZIP Code <i>P.O. Box 440</i>	
Postage <i>Levento, FL</i>	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date <i>10-14-92</i>	

PS Form 3800, June 1985





## Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

October 14, 1992

Mr. James Pinkerton, Director  
Department of Technical Services  
Citrus County Division of Engineering  
Post Office Box 440  
Lecanto, FL 32661

Re: Citrus County's violation of Permit No.: S009-187229  
(Specific Conditions #1 and #38) and 17-4.160, FAC -  
extensive discharge of leachate to the  
stormwater system on October 8, 1992 at the Central  
Landfill

Dear Mr. Pinkerton:

This letter is to document requirements the FDER conveyed to you  
at 11:00 a.m. on October 8, 1992 at Citrus County's Central  
Landfill:

1. Terminate pumping of leachate to the stormwater system and DRA immediately.
- 2.a. Recirculate leachate within the landfill over the liner. Build a berm to prevent leachate from discharging beyond the liner.
- b. Haul as much leachate as possible to a permitted facility.
- c. Directly pump leachate to the treatment facility until the lift station is cleaned of sand and operational.
3. Increase operation and manning of the leachate treatment plant to handle an increased quantity of leachate without sacrificing the water quality of the effluent.
4. An independent certified laboratory shall take samples 100' apart at 3 locations of the leachate pumped to the stormwater ditch on the west side of the landfill and samples 200' apart at 3 locations from the stormwater DRA on the south side of the landfill. All samples shall be tested for identical parameters as required by your permit for the effluent discharged from the leachate treatment facility. Forward results to the Department as soon as possible.

Mr. James Pinkerton, Director  
Citrus County

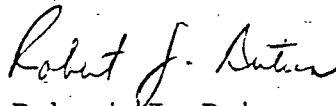
October 14, 1992  
Page Two

5. Submit to the Department within 7 days notification of the storm event, operational problems and rationale for the County's action to pump millions of gallons of leachate into the stormwater system. Inform this Department why the County did not comply with permit specific condition #38 issued September 11, 1992. This condition was added to your permit due to this Department's lack of credibility in the environmentally safe operation of the Central Landfill.

The Department has estimated that approximately 2.5 million gallons of leachate was ponded within the stormwater system on October 8, 1992. This Department is currently proceeding with enforcement action.

If you have any questions regarding this letter, you may contact Steve Morgan at (813) 744-6100, extension 385 or Bob Butera at extension 451.

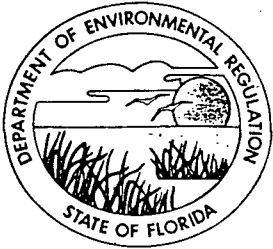
Sincerely,



Robert J. Butera, P.E.  
Solid Waste Manager  
Division of Waste Management

RJB/ab

cc: Ralph Hedgecoth, Citrus County Utilities  
Thomas Dick, Citrus County Solid Waste Director  
Chester J. White, Chairman, Citrus County BCC  
Anthony L. Shoemaker, County Administrator  
Steve Morgan, FDER Tampa  
Kim Ford, P.E., FDER Tampa  
William Kutash, FDER Tampa



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

October 8, 1992

Mr. James Pinkerton, Director  
Department of Technical Services  
Citrus County - Division of Engineering  
Post Office Box 440  
Lecanto, FL 32661

Re: Corrective Action - Citrus Central Landfill  
S009-187229, Citrus County

Dear Mr. Pinkerton:

The Department is in receipt of a letter from Mr. Thomas H. Dick, Solid Waste Director, dated September 28, 1992 identifying Citrus County's proposed short term corrective action plans to eliminate ponding of leachate within the landfill as well as other unacceptable operational procedures. The Department's review of your response by item number requires the following:

- Item 1 Recirculation System - sprayheads shall be installed by extending each head to a location down the slope of the geomembrance liner that will preclude any leachate drift beyond the extent or the top of the liner. This system shall not be operated on windy days when possible to avoid overspray or drift may occur. The Department requests a sketch and/or plan of this system identifying it's specific location relative to the face and top side of the liner.
- 1a. Prior to use of the septage pond liner for a temporary holding pond for leachate, it shall be inspected for cuts, punctures or damaged seams and repaired as required. Submit inspection report and repair patch testing results from an approved FDER testing laboratory. Submit specific details for the proposed leachate pump station to be installed within the septage pond. This Department is concerned of the proposed liner interface with pump station footing and possible settlement which could result in a rupture.

- Item 2 Increased water quality testing must be increased proportionally as the quantity of leachate treated increases. Submit to this Department rationale from Zimpro-Passavant, Inc. relative to decreasing batch time without decreasing effluent water quality.

Mr. James Pinkerton, Director      October 8, 1992  
Department of Technical Services      Page Two

- Item 5      Submit septage disposal facility location and verification from that facility as to the quantity of septage that was disposed. Did HRS approve the septage disposal?
- Item 8      The bottom liner location on the north side must be verified and staked. These stakes shall be located at 150 foot intervals.
- Item 10      The Department recommends your proposal of additional groundwater monitoring. All modifications to the groundwater monitoring plan including addition of a groundwater monitoring well as proposed must be reviewed by the FDER and a modification to your permit is required prior to installation.

The Department will require the following fees for permit modifications:

1. Item 2      Leachate Treatment Plant Modification - \$250.
2. Item 7      Site Sequencing, Operational and Traffic Control Modification - \$250.
3. Item 7      Stormwater Design Modification - \$100.
4. Modification to the Groundwater Monitoring System - \$250.

The Department is awaiting your proposed revised plan of operation to be submitted by October 30, 1992. Please include appropriate permit modification fees noted above. All plans and reports submitted shall be signed and sealed by a professional engineer. The Department will require Citrus County to enter into a Consent Order for all items not resolved prior to December 1, 1992 with specific compliance dates and penalties as noted in the Department's letter to you dated September 11, 1992.

If you have any questions concerning this letter you may contact me at (813) 744-6100, extension 451.

Sincerely,

*Robert J. Butera*

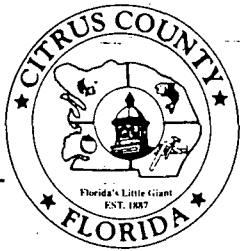
Robert J. Butera, P.E.

Solid Waste Manager

Division of Waste Management

RJB/ab

cc: Thomas Dick, Citrus County Solid Waste Director  
Ralph Hedgecoth, Citrus County Utilities Director  
Kim Ford, P.E., FDER Tampa  
Steve Morgan, FDER Tampa  
William Kutash, Administrator, FDER Tampa  
Chester J. White, Chairman, Citrus County BCC  
Anthony L. Shoemaker, County Administrator



CITRUS COUNTY

## DEPARTMENT OF TECHNICAL SERVICES

1300 South Lecanto Highway • P.O. Box 440  
Lecanto, Florida 32661-0440  
(904) 746-2694 • FAX (904) 746-9874

Reply To:

D.E.R.

SEP 30 1992

SOUTHWEST DISTRICT TAMPA

Division Aquatics and  
Solid Waste Management  
P. O. Box 440  
Lecanto, FL 34460-0440  
(904) 746-5000  
FAX (904) 527-1204

September 28, 1992

Robert J. Butera, P.E.  
Solid Waste Manager  
Division of Waste Management  
Dept. of Environmental Regulation  
Southwest District  
4520 Oakfair Boulevard  
Tampa, FL 33610-7347

RE: ACTION PLAN (per FDER letter dated September 10, 1992)

Dear Mr. Butera:

Submitted herewith for your approval is Citrus County's plan for corrective actions at the Central Landfill:

1. Collect and remove all leachate that is ponding on the surface of the landfill and eliminate all future ponding via appropriate regrading and/or modification of existing stormwater system to reduce inflow to disposal area. Note: All ponded water on top of the disposal area is considered leachate and shall be contained and removed for treatment.

The County proposes to construct a leachate recirculation system to collect and divert the leachate that is ponding on the surface of the landfill to a temporary reservoir where it can be held and subsequently recirculated to the leachate collection system. The recirculation system proposed is a series of spray heads across the top of the geomembrane liner. Recirculation of the leachate through atomizing spray heads onto the geomembrane liner may reduce the volume of leachate (evaporation), thereby lessening the impact on the treatment plant.

James W. Pinkerton, P.E.  
County Engineer and Director



Printed on recycled paper

This proposed leachate recirculation system is shown in Figure 1. The following tasks are required to create the system:

- a. Discontinue use of the septage pond located near the southwest corner of the 80 acre site. The septage contained in the pond must be hauled off-site for final disposal. This septage pond (515,000 gallon capacity) has a geomembrane liner and will be utilized as the "reservoir" for the leachate recirculation system. ESTIMATED COST: \$20,200
- b. Construct a catch basin preceded by a weir system and swale in the northwest corner of Phase I (active cell). Regrade the working faces in the active cell to force both the ponding leachate to this area and the recirculated leachate recaptured at the base of the liner following spraying activities. ESTIMATED COST: \$ 4,500
- c. Reactivate the stormwater liftstation located near the northwest corner of Phase 1, pipe the leachate from the catchbasin to the liftstation and pump via above ground PVC pipe to the leachate reservoir. ESTIMATED COST: \$ 1,500
- d. Construct a header system across the top of the Phase 1 geomembrane liner with 50 atomizing spray heads. Pump the leachate from the reservoir through the spray heads and onto the liner. Each spray head has the capacity of spraying 1.5 gallons of leachate per minute yielding a total of 4,500 gallons of recirculation per hour (36,000 gallons per day). ESTIMATED COST: \$ 5,700
- e. Construct an asphalt curb around the leachate recirculation reservoir to minimize stormwater runoff intrusion. ESTIMATED COST: \$ 3,000

The estimated total cost for this recirculation system is \$35,000. Staff estimates the system can be operational in 7-10 days following FDER approval.

Appropriate regrading and modifications to the existing stormwater system will be accomplished following the removal of ponded leachate. The stormwater management plan will be made a part of the operational plan (see Item #7).

September 28, 1992

Mr. Robert J. Butera, P.E.

Page 3

2. Operate the treatment plant at maximum capacity. The pumping of the leachate to the treatment facility should be improved to achieve this maximum capacity.

The leachate treatment plant was supplied by Zimpro/Passavant, Inc. The system includes a trio of batch-operated PACT units and a sludge/effluent equalization tank. The PACT system combines powdered activated carbon with biological treatment. Each batch unit is self-contained and capable of independent operation.

While the system is designed to treat up to 30,000 gallons per day, the Division of Utilities and Zimpro/Passavant Inc. officials believe that, with some relatively minor alterations, the plant capacity can be doubled. Instead of each batch tank being utilized once per day, the batch time will be reduced to allow for two batches per tank per day or 60,000 gallons of treatment. The physical modifications to the treatment facility can be accomplished for approximately \$500. Doubling the batches however will require plant operations 7 days per week, 12 hours per day. In addition to the increase in operator hours, materials, electrical consumption and effluent testing are also expected to double.

The estimated cost for increasing the capabilities of the treatment plant is \$66,000. The leachate treatment plant began 7 day per week operations on September 26, 1992. Double batching is scheduled to start during the week of September 28, 1992.

3. Truck off-site all untreated leachate which can not be processed by on-site treatment within the next 30 days to a permitted wastewater treatment facility.

The County has expectations to process all leachate on-site with the above outlined improvements to the leachate collection/treatment systems. In the event that we are unable to accomplish this objective within the timeframe allocated (October 30, 1992), off-site trucking to a permitted wastewater treatment facility will be provided.

4. Do not dispose of solid waste in water.

Solid waste disposal is on-going in the southeast section of lower tier on-site. This area is currently dry. The movement of the working face is in a westerly direction which will assist in the movement of ponding leachate toward the temporary leachate collection point for conveyance to the recirculation system.

September 28, 1992

Mr. Robert J. Butera, P.E.

Page 4

5. Remove by processing, through treatment system or trucking off-site, at least 2 feet of wastewater from the septage pond to allow additional capacity for rain events.

All septage and sludge from the septage pond has been trucked off-site for disposal in anticipation of this lined pond being utilized as the leachate recirculation reservoir. The Board of County Commissioners authorized the discontinuance of this septage facility on September 22, 1992. Septage will no longer be accepted at this landfill

6. Continue to implement above described water management practices until you reduce the hydraulic head on the liner within the leachate collection systems to one foot or less as required per F.A.C. 17-701.050(5)(e).

All management practices described herein will be conducted for as long as necessary to comply with F.A.C. 17-701(5)(e).

7. Follow the approved plan of operation as indicated in the approved permit as to the sequence of filling and covering.

The County has not and continues to be unable to follow the designed plan of operation with reference to site sequence of filling due to the large number of passenger vehicles (600/day) utilizing this facility. The County's Division of Engineering is studying the original design and current operational procedures to develop an interim plan of operation. This plan will be submitted for your review no later than October 30, 1992. The plan will address minimizing the generation of leachate and maximizing stormwater resulting from storm events. Site sequencing, traffic control, stormwater structures and conveyance systems will also be included.

An annual operational plan will be made a part of the long term plan by the consultant engineer hired to perform the tasks associated with the permanent solution to the leachate problems.

8. Verify the extent of the landfill liner on the north side and its ability to contain leachate on that boundary of the cell.

Construction plans for Phase 1 of the landfill depict a phase leachate isolation berm on the north side of the landfill. This isolation berm(4') is depicted in the PBS & J plans entitled Citrus County Central Sanitary Landfill Expansion dated March 1989. Photographs taken during construction are on file at the landfill to verify the placement of this berm and can be made available for your review if needed.



September 28, 1992

Mr. Robert J. Butera, P.E.

Page 5

9. Slope intermediate cover for optimum management of storm runoff.

Management of stormwater will be an integral part of both the interim operational plan currently being prepared for submittal by October 30, 1992, and in the long term plan. As the ponded leachate is removed from the site and areas become workable, cover will be replaced and graded to optimize management of stormwater runoff.

10. Evaluate and explain apparent groundwater violations noted in Citrus County's August submittal of groundwater monitoring results. Report of corrective actions.

Groundwater monitoring results submitted in August 1992 reported the presence of several volatile organic compounds (VOC's) in two well sites (Monitor Well "A" and Monitor Well "C"). Anomalies with groundwater tests in this general vicinity is not new.

Citrus County's groundwater monitoring plan was prepared by Seaburn and Robertson, Inc. in June 1985. Noteworthy is the fact that the 1985 soil boring log for MW-A indicated the presence of "leachate" odor in the upper 25 feet of soil at this well site. In addition to this apparent initial problem with this specific well location, other anomalies with test results from this location have been reported from time to time but with no identifiable trend or historical significance. This situation was initially discussed by the County and FDER (Mr. Steve Morgan) in 1988.

It is the County's belief that these test reports may be the findings of a localized condition relative to the well site.

Both MW-A and MW-C are located adjacent to one another in close proximity to the westerly boundary of this 60 acre closed landfill. Landfilling operations began in the southwest corner of this landfill in 1975. Neither landfilling techniques nor record keeping were as accurate as they are today. The precise western boundaries of the individual "cells" on this site are for the most part only by recollection of landfill workers at the time. These well sites may therefore be much closer to the landfill "cells" than originally believed.

Also noteworthy is that these monitor wells appear to be located in a naturally depressed area. The low area is seasonally damp/wet which may also contribute to this localized condition.

September 28, 1992  
Mr. Robert J. Butera, P.E.  
Page 6

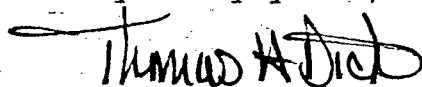
Each of these factors prevent a clear understanding of the reported test results.

Citrus County proposes to drill another monitor well to provide a better understanding of the overall groundwater situation. This new well should be located 200'- 400' in a southwesterly (downgradient) direction from these well sites in question. The siting of this well will require the permission of the State of Forestry Division as it will be located within the Withlacoochee State Forest. Once established, the new site can be monitored for both primary and volatile organic compounds as a part of the County's groundwater monitoring plan.

In addition to these short term corrective action plans, the County shall be providing long range site plans. The attached RFQ has been advertised for the projects contained therein.

Please contact me following your review of this action plan so that we can begin implementation as soon as possible.

Very truly yours,

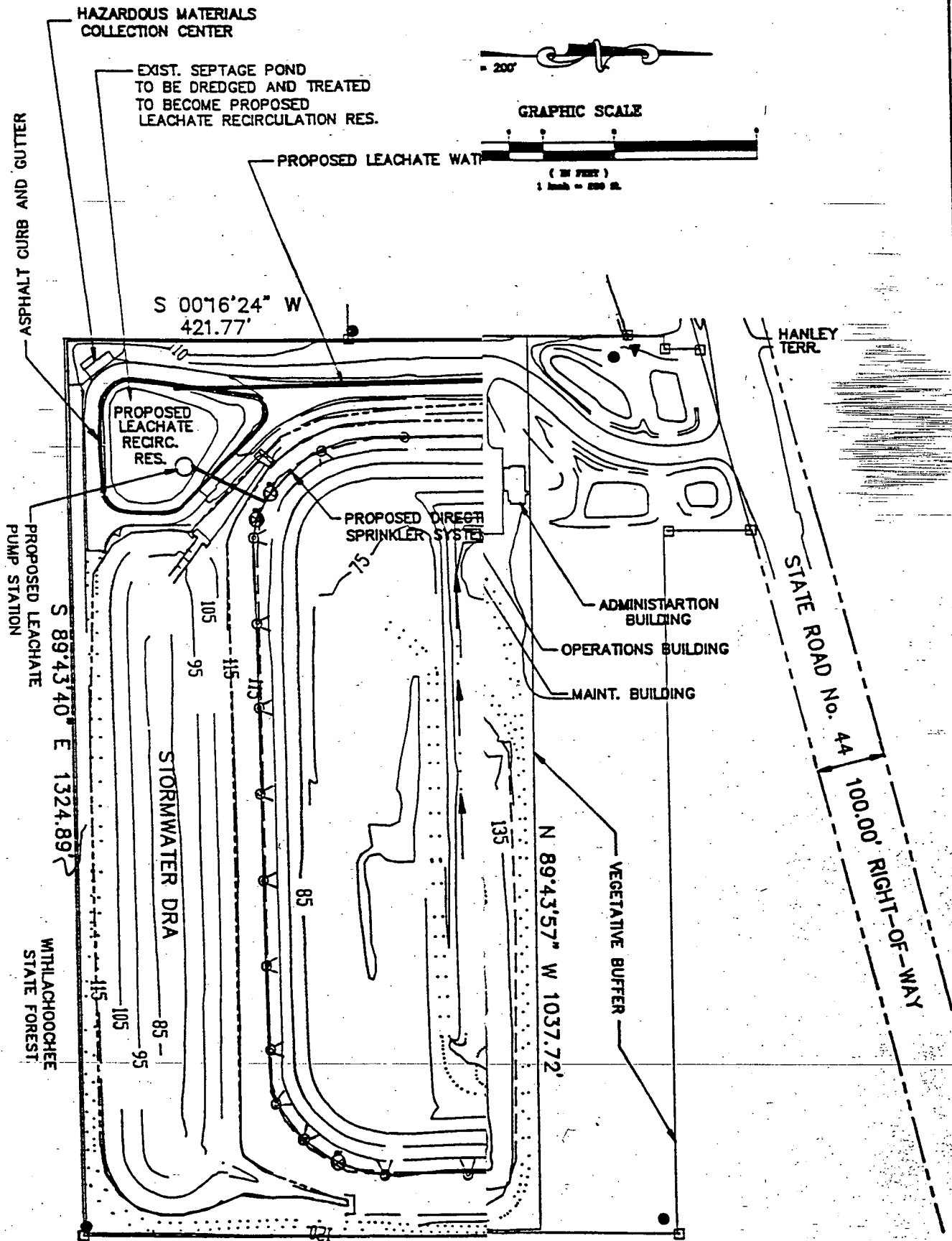


Thomas H. Dick, Director,  
Division Aquatics and Solid Waste Management

THD:cms

cc: Anthony L. Shoemaker, County Administrator  
Steven J. Wylie, Assistant County Administrator  
James W. Pinkerton, Dir. Dept. Technical Services  
Mike Moore, Projects Engineer  
Ralph L. Hedgecoth, Dir. Div. Utilities

FIGURE 1



BY	DATE	REVISIONS	BY	DATE

LEACHATE RECIRCULATION SYSTEM  
E 80 ACRE LANDFILL SITE

PROJECT NUMBER  
88-618

SCALE  
AS SHOWN

SHEET  
OF

REQUEST FOR STATEMENTS OF QUALIFICATIONS  
FROM CONSULTING ENGINEERS  
FOR CITRUS COUNTY LANDFILL EXPANSION  
AND LEACHATE SYSTEM

Citrus County, Florida will receive Statements of Qualifications from interested consulting engineers to provide engineering services for the following project:

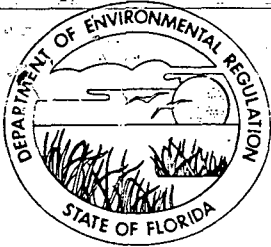
EXPANSION OF LANDFILL, LEACHATE COLLECTION AND  
TREATMENT, AND APPLICABLE PERMITTING

Statements of Qualifications should contain as a minimum Standard Forms 254 & 255. Consultants will be short-listed in accordance with the following criteria:

1. Experience with similar projects;
2. Qualifications of professional staff;
3. Current work load;
4. Proximity to job site;
5. Knowledge of Federal, State and local regulations, and
6. Knowledge of local conditions.

Those firms short-listed for the above project will be interviewed by the Board of County Commissioners and then ranked for the purpose of negotiating a contract.

Interested firms should send three (3) copies of qualifications to Citrus County Engineer, 1300 South Lecanto Highway, Lecanto, Florida 34461, no later than 5:00 p.m., E.D.T., Friday, October 9, 1992.



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

SEP 1 1992

Mr. James Pinkerton, Director  
Department of Technical Services  
Citrus County  
Division of Engineering  
Post Office Box 440  
Lecanto, FL 32661

Re: Modification of Conditions  
Permit No.: SO09-187229  
Citrus County Class I Sanitary Landfill

Dear Mr. Pinkerton:

Due to recent site conditions, the Department hereby modifies your permit. The conditions are changed as follows:

Condition

From

To

Specific Condition #38.

as follows

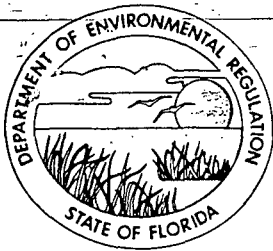
38. In the event of damage to any portion of the site's facilities or failure of any portion of the systems or a site condition which may result in the failure to achieve compliance with any applicable department rule or condition of this permit, the permittee shall immediately notify the Department of Environmental Regulation explaining such occurrence, remedial measures to be taken and time needed for repairs. Written detailed notification shall be made within one week following the occurrence.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

Richard D. Garrity, Ph.D.  
Director of District Management  
Southwest District

RDG/kbfb



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

## NOTICE OF PERMIT

SEP 11 1992

Mr. James Pinkerton, Director  
Department of Technical Services  
Citrus County  
Division of Engineering  
Post Office Box 440  
Lecanto, FL 32661

Dear Mr. Pinkerton:

Enclosed is modification of existing permit, Permit Number SO09-187229, issued pursuant to Section(s) 403.087(1), Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, F.A.C., and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee 32301, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the Clerk of the Department unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

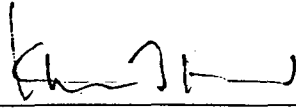
When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Mr. James Pinkerton, Director  
Citrus County  
SO09-187229

SEP 1 1992

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Kim B. Ford, P.E.  
Professional Engineer I  
Division of Waste Management

KBF/ab  
Attachment

cc: Kathy Anderson, FDER Tallahassee  
Robert Butera, P.E., FDER Tampa  
Steve Morgan, FDER Tampa

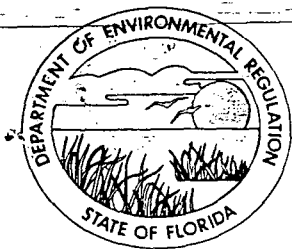
CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on SEP 1 1 1992 to the listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(10), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

  
Clerk

SEP 1 1 1992  
Date



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

September 10, 1992

Mr. James Pinkerton, Director  
Department of Technical Services  
Citrus County  
Division of Engineering  
Post Office Box 440  
Lecanto, FL 32661

Re: Corrective Action Required at the Citrus Central Landfill  
by the FDER  
S009-187229, Citrus County

Dear Mr. Pinkerton:

The intent of this letter is to document procedures and corrective actions the Department believes are required to be performed both short-term (not later than September 30, 1992) and long-term to resolve repeated violations of Department rules and permit operational criteria at the Citrus Central Landfill. The long-term plan of action shall be submitted to the FDER as a minor modification with a fee of \$250.00 together with a schedule for compliance by December 1, 1992.

No later than September 30, 1992, the Department requests that the following actions be taken and reported to our office by means of an immediate plan of action:

1. Collect and remove all leachate that is ponding on the surface of the landfill and eliminate all future ponding via appropriate regrading and/or modification of existing stormwater system to reduce inflow to disposal area.  
Note: All ponded water on top of the disposal areas is considered leachate and shall be contained and removed for treatment.
2. Operate the treatment plant at maximum capacity. The pumping of the leachate to the treatment facility should be improved to achieve this maximum treatment capacity.
3. Truck off-site all untreated leachate which can not be processed by on-site treatment system within the next 30 days to a permitted wastewater treatment facility.
4. Do not dispose of solid waste in water.
5. Remove by processing, through treatment system or trucking off-site, at least 2 feet of waste water from the septage pond to allow additional capacity for rain events.



6. Continue to implement above described water management practices until you reduce the hydraulic head on the liner within the leachate collection system to one foot or less as required per F.A.C. 17-701.050(5)(e).
7. Follow the approved plan of operation as indicated in the approved permit as to the sequence of filling and covering.
8. Verify the extent of the landfill liner on the north side and its ability to contain leachate on that boundary of the cell.
9. Slope intermediate cover for optimum management of storm runoff.
10. Evaluate and explain apparent groundwater violations noted in Citrus County's August submittal of groundwater monitoring results. Report on corrective actions.

The following suggestions are presented by the Department thru Mr. Kim Ford and myself to assist the County in resolving the above violations:

1. Install a sump in ponded areas to collect leachate and allow recirculation by spraying or misting on the exposed liner during daytime hours.
2. Haul leachate to a permitted wastewater treatment facility.
3. Transfer septic waste to a wastewater treatment facility or an approved disposal site to allow usage of the lined septage pond area as a holding pond for leachate prior to treatment.
4. Reduce surface water <sup>and</sup> improvement by utilizing a more permeable cover soil - preferably equivalent to the leachate collection system drainage layer permeability of  $1 \times 10^{-2}$  cm/sec to  $1 \times 10^{-3}$  cm/sec.

No later than December 1, 1992, the Department requests that the following be resolved by the County and/or their engineers as a permanent solution to these repetitive violations. Please submit a schedule of key events and appropriate engineering design to the Department for approval:

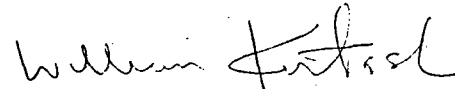
1. Permanent elimination of leachate ponding on-site within the disposal areas.
2. Sodding or seeding of all slopes to prevent any further erosion.
3. Investigate usage of permanent recirculation and/or spray irrigation as a leachate water management option.

4. Submit water balance calculations demonstrating the adequacy of recommended method of leachate handling.
5. Annual operational plan including site sequencing and a comprehensive solid waste facility management plan to assure the Department that compliance and a clear understanding of 17-701, 17-710, 17-711, 17-25 and 17-730, F.A.C. regulations has been provided to the on-site landfill staff and managers.

For those items that cannot be resolved by December 1, 1992, the Department will pursue Citrus County to enter into a Consent Order with specific compliance dates and penalties as outlined in the Department's Enforcement Policy guidelines.


The Department suggests that Citrus County acquire engineering assistance necessary to resolve the aforementioned violations. All requested plans and reports shall be signed and sealed by a professional engineer. Contacts with other landfill operators who are handling their leachate successfully is highly recommended in addition to TREEO courses offered periodically for landfill operators, engineers, and managers.

Sincerely,



Robert J. Butera, P.E.  
Solid Waste Manager  
Division of Waste Management

RJB/ab

cc: Thomas Dick, Citrus County Solid Waste Director  
Ralph Hedgecoth, Citrus County Utilities Director  
Steve Morgan, FDER Tampa  
 P.E., FDER Tampa  
William Kutash, Administrator, FDER Tampa

P 149 930 820

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to <i>Thomas Dick</i>	
Citrus County	
Street and No. <i>P.O. Box 440</i>	
P.O., State and ZIP Code <i>Decatur, FL 32061-0440</i>	
Postage	<i>0440</i> \$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date <i>11-21-91</i>	

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:  
*Thomas Dick*  
*Dir. of Solid Waste Mgt.*  
*Citrus County*  
*P.O. Box 440*  
*Decatur, FL 32061-0440*

4. Article Number:  
*P 149 930 820*

Type of Service:  
☐ Registered ☐ Insured  
☒ Certified ☐ COD  
☐ Express Mail ☒ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee  
*X*

6. Signature — Agent  
*X* *Clare Smith*

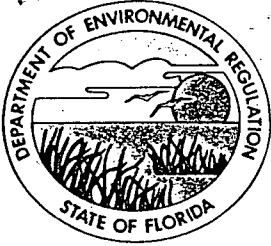
7. Date of Delivery  
*11/27/91*

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

PS Form 3811, Apr. 1989

U.S.G.P.O. 1989-238-515

DOMESTIC RETURN RECEIPT



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-623-5561

Carol M. Browner, Secretary

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

NOV 21 1991

Thomas Dick  
Division of Solid Waste Management  
Citrus County  
Post Office Box 440  
Lecanto, Florida 32661-0440

RE: Warning Notice Letter #WN91-0018SW09SWD  
Citrus County Central Landfill

Dear Mr. Dick:

A field inspection of your facility indicates that you may be in violation of Chapter 403, Florida Statutes, and the rules promulgated thereunder. On October 10, and October 30, 1991, Department personnel observed the following at your facility:

1. Leachate is ponding in the active cell and waste is floating in this pond.
2. The required 2' protective layer of soil on top of the liner is not in place, and waste is pushed directly against liner.
3. The sides of the drainage retention area have eroded badly.
4. The closure of the 7-acre cell is not as it was approved. There are low areas resulting in improper drainage and berms have been constructed that were not shown on the plans.
5. There is evidence of past septage pond overflow.
6. Used oil has contaminated the soil in front of the waste oil container beyond the HDPE liner.

The ponding of leachate is a violation of FAC Rule 17-701.050(5)(e), which states, "Landfills shall have a leachate collection and removal system immediately above the liner that is designed, constructed, maintained and operated to collect and remove leachate from the landfill. The leachate depth on top of the liner shall not exceed one foot depth of leachate."

NOV 21 1991

The lack of a protective layer on top of the liner is a violation of FAC Rule 17-701.050(5)(c)6., which states "Flexible membrane liners shall be protected from physical damage above and below the membrane. A minimum 24 inch thick protective layer of soil or other material approved by the Department shall be installed on top of the upper membrane."

The erosion of the drainage retention area is a violation of FAC Rule 17-701.050(5)(g), which states, "Landfills shall have a stormwater run-off control system designed, constructed, operated and maintained to collect and control stormwater to meet requirements of FAC Rule 17-25 and of the respective water management district."

The unapproved variations on the closure of the 7-acre cell constitute violations of FAC Rule 17-701.073(6)(c) and (7) and 17-701.075.

The spilling of used oil onto the ground is a violation of FAC Rule 17-710.400(2), which states, "No person may discharge used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters."

It is a violation of Rule 17-4.030, Florida Administrative Code and Sections 403.161(1)(b) and 403.087, Florida Statutes, for any facility that can reasonably be expected to be a source of pollution to operate without an appropriate and valid permit issued by the Department. Also, a facility that causes or allows the disposal of pollutant materials onto the ground may be in violation of Sections 376.302, and 403.088, Florida Statutes and 17-3.404. Florida Administrative Code, if the disposal results in a discharge to groundwater.

You are advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$10,000 [\$5,000 for drinking water cases] per violation per day pursuant to Sections 403.141 and 403.161, Florida Statutes.

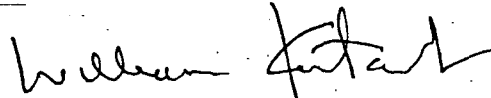
You are requested to contact Stephanie Hinson of this office at (813) 623-5561, ext. 374, within 15 days of receipt of this Warning Letter to arrange a meeting with Department personnel to discuss the issues raised in this Warning Letter. You may wish to consult an attorney and to have the attorney attend the meeting with the Department.

Citrus County Central Landfill  
Warning Letter #WN91-0018SW09SWD

Page Three

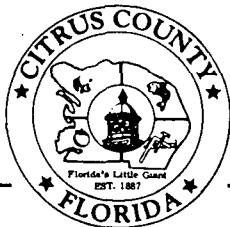
PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. If the Department determines that an enforcement proceeding should be initiated in this case, it may be initiated by issuing a Notice of Violation or by filing a judicial action in accordance with Section 403.121, Florida Statutes. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation. The Department can also resolve any violation through entry into a Consent Order.

Sincerely,



for Richard D. Garrity, Ph.D.  
Director of District Management  
Southwest District

RDG/shr



CITRUS COUNTY

# DEPARTMENT OF DEVELOPMENT SERVICES

1300 South Lecanto Highway

Lecanto, Florida 32661-8099

(904) 746-4223

In reply, refer to:

CPM-91-213

CERTIFIED MAIL

P 041 868 220

May 14, 1991

D.E.R.

MAY 15 1991

SOUTHWEST DISTRICT  
TAMPA

Harley and Betty Mae Wyant  
4643 N. Tumbleweed Trail  
Hernando, Florida 32642

RE: APACHE SHORES UNIT 9, BLOCK 32, LOT 17.8  
SECTION 14, TOWNSHIP 18 SOUTH, RANGE 19 EAST  
CITRUS COUNTY, FLORIDA

Dear Mr. and Mrs. Wyant:

A recent inspection of your above-referenced property has revealed that the abandoned pit located, in part, on your property is being used as an unauthorized site for the depositon of lot clearing debris.

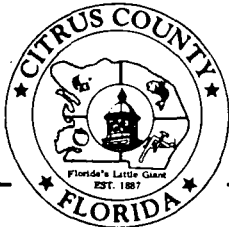
Please contact this office within seven (7) days of receipt of this correspondence so that we may coordinate our efforts to correct this violation. Thanking you in advance for your anticipated cooperation in this matter.

Sincerely yours,

Nancy Witty  
Code Enforcement Specialist

NW/mt

cc: Gary W. Maidhof, Environmental Specialist  
Randy Messer, HazMat Division  
Sgt. Sommer, FGFWFC  
Kim Ford, FDER



CITRUS COUNTY

# DEPARTMENT OF DEVELOPMENT SERVICES

1300 South Lecanto Highway  
Lecanto, Florida 32661-8099  
(904) 746-4223

In reply, refer to:

CPM-91-214

CERTIFIED MAIL  
P 041 866 302

May 14, 1991

D. E. R.

MAY 15 1991

SOUTHWEST DISTRICT  
TAMPA

Robert L. and Pauline Travis  
4547 N. Tumbleweed Trail  
Hernando, Florida 32642

RE: APACHE SHORES, UNIT 9, BLOCK 32, LOTS 7, 8 AND 8.3  
SECTION 14, TOWNSHIP 18 SOUTH, RANGE 19 EAST  
CITRUS COUNTY, FLORIDA

Dear Mr. and Mrs. Travis:

A recent inspection of your above referenced abandoned pit located, in part, on your property is being used as an unauthorized site for the deposition of lot clearing debris and household wastes.

Please contact this office within seven (7) days of receipt of this correspondence so that we may coordinate our efforts to correct this violation. Thanking you in advance for your anticipated cooperation in this matter.

Sincerely yours,

*Nancy Witty*

Nancy Witty  
Code Enforcement Specialist

NW/mt

cc: Gary W. Maidhof, Environmental Specialist  
Randy Messer, HazMat Division  
Sgt. Sommer, FGFWFC  
Kim Ford, FDER