



Florida Department of Environmental Protection

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November 5, 2015

E-Mail
larry.brock@citrusbocc.com

Mr. Larry Brock
Assistant Public Works Director
Citrus County Board of County Commissioners
3600 W. Sovereign Path, Suite 212
Lecanto, FL 34461

RE: Citrus County Class I Central Landfill, Citrus County
Operation Permit Renewal 10-year term
WACS No. 39859
21375-25-SO/01

Dear Mr. Brock,

Thank you for the subject Citrus County Central Landfill Operation Permit Renewal Application dated October 13, 2015 and received on October 14, 2015. This renewal application was prepared by SCS Engineers. Based on the Department's review, the application is incomplete at this time. Please provide the information requested below as soon as possible.

1. The following link points to a webpage containing the 2015 version of the landfill permit application form. This form has been adjusted to include the 2014 updates to 62-701 F.A.C. and is included in Chapter 62-701 as 62-701.900(1) F.A.C. Please resubmit your permit renewal application using the current (2015) form and reconcile all rule references in the application with the 2014 Chapter revision.
[http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-701/62-701.900\(1\).pdf](http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-701/62-701.900(1).pdf)
2. You supplied a table listing cross references needed to reconcile the numbering used in 62-701.900(1) F.A.C. with the internal numbering system used in your application. Future readers will have an easier time if your numbering system in your permit application is consistent with the numbering system in 62-701.900(1) F.A.C. Please adjust your application to match reflect the order and the numbering of sections in the permit application form before resubmittal.
3. Numerous spelling/numbering/chapter title/included reference errors are present in the proposed Operation Plan. Examples of these include:

- a. On Page B-1, Section B.2, please list key personnel by name in the first chapter of the Operation Plan.
- b. On Page B-4I, Section B.3, you speak about a contingency plan in the first paragraph and an "Emergency Incidents Plan" in your Section B.3.a. These appear to be the same document. Please decide on a name for this document and, in the introductory paragraph identify that this document also serves to fulfill the requirements of 62-701.320(16).
- c. Page C-1, Section C discusses a leachate sampling plan. Leachate sampling is no longer required. Also, as per the 62-701.500(4)(a) F.A.C. rule update, you need to record county of origin for your waste.
- d. Page E-1, please state in Section E that access will only be allowed when an attendant is on duty.
- e. F-1, Section F 62-701.500(6)(a) F.A.C. addresses unauthorized wastes. Item 4 on this page discusses restricted material. Are "unauthorized waste" and "restricted material" the same?
- f. Page F-2 Section F-2 on page F-2 to fully reflect the requirements of 62-701.500(6)(b)(1) F.A.C. Please pay special attention to the requirement that you promptly notify the Department when regulated hazardous wastes are identified during random load checking. Also, describe the precautionary measures required by 62-701.500(6)(b)F.A.C. Please clarify your reasoning underlying the inclusion of waste tires in your hazardous waste stream. Also please address 62-701.500(6)(b)(2)(d) F.A.C. with regard to temporary storage of waste.
- g. Please add the requirement that all inspection results must be maintained at the landfill for a minimum of 3 years to page F-3 as per 62-701.500(6)(b)(2)(c) F.A.C.
- h. Page G-1, Section G-4 Please adjust your wording to qualify the requirement to read "The working face will only be wide enough" as per 62-701.500(7)(d).
- i. Page G-2, Section G-6, please explain how per 62-701.500(7)(f) F.A.C applies to intermediate cover.
- j. Page G-2 Section G-7 is labeled as Final Cover. Most readers would recognize that 62-701.500(7)(g) F.A.C refers to intermediate cover.
- k. The rule referred to in the Litter Policing Erosion Control Subsections (G.9 and G.10) are mislabeled. 62-701.500(7)(j) F.A.C. addresses litter policing while 62-701.500(7)(k) F.A.C describes erosion control requirements. This rule also includes time standards for department notification. These time requirements do not appear in your proposed operation plan submittal. Please add them.

1. The Emergency Contact Chart on page 14 of the Emergency Incidents and Contingency Plan is confusing. Please redo this chart in a standard "organization chart" format.

Items a-l above should be construed as a starting point. It is by no means a complete representation of the items in your application that require further attention.

Your Operation Plan should be a stand-alone document. In general, when a rule requires DEP notification you should provide the DEP contact point in your Operation Plan. If a time limit for notification is specified in the rule, this needs to be carried over to your Operation Plan.

In every case, if there is a conflict between any F.A.C. rule and your Operation Plan, the rule will prevail.

4. You have indicated a desire to use on-site soils for final closure. Use of onsite soils will reduce the amount of required Financial Assurance. AS per 62-701.630(3)(d)1 F.A.C. and 62-701 (3)(d)2 F.A.C, this is permitted. Please submit a letter that satisfies 62-701.630(3)(d)1 F.A.C. This letter should be sealed by a P.E. and should clearly indicate all documents included by reference. The letter should also include a drawing delineating the exact area on the site from which the closure soil will be drawn and sufficient geotechnical information to support your representation of suitability (ie you may want to consider the eventual installation of additional borings to further characterize the borrow material). Please submit separate pdf's of the documents included by reference for entry into Oculus. Please submit a covenant, easement, trust or other legal agreement with the Department as required by 62-701.630(3)(d)2. As per our telephone conversation of November 4, 2015, the Department has developed "boilerplate" for a model agreement that satisfies the rule. This will be forwarded to you in a separate e-mail.
5. You have submitted a DVD provided by Florida Jetclean to provide a video record of your 2015 LCS inspection. The DVD contains a series of .vob files. Please provide the Department with .mp4 files.
6. Please provide a table listing all "Documents Included by Reference." It is the Department's intent to provide Oculus hotlinks to all listed documents. The conforming final permit modification application will include these Oculus links.
7. Please adjust the cover letter to represent that that all significant changes from the previous application are included in your summary. This letter should be signed by a P.E.
8. The expiration date on the Closure Cost Estimate should be changed to reflect the new expiration date. This is a new estimate and as per 62-701.630 (4)(b) estimates are to updated every 5 years.
9. Please submit a Water Quality Monitoring Plan as per 62-701.510(2)(a) incorporating the changes proposed by CDM Smith in the report titled "Water Quality Monitoring Plan Evaluation Report, Semester0 1 2013-Semester 1 2015", dated September 2015. Include an updated figure showing the revised Zone of Discharge and revised monitor well locations.

Please reconcile your proposed Water Quality Monitoring Plan with Consent Order #05-1078. The specific areas of concern are:

a. Ground Water Quality – Northwest Corner of Facility

-Impacts to ground water quality on the west side of the landfill (the closed disposal areas) were addressed as part of CO #05-1078. Results reported for recent routine ground water sampling events show persistent, low-level exceedances for benzene, methylene chloride and vinyl chloride at well MW-10 with a downward trend of concentrations. No exceedances have been reported for the lateral extent well (MW-18), however the vertical extent well (MW-19) has reported a recent and increasing trend of methylene chloride concentrations. Please address the increase of methylene chloride concentrations detected at vertical extent well MW-19.

Ground Water Quality – Background Well MW-7

-The last 4 routine sampling events have reported exceedances of the benzene standard, with no apparent trend. It appears unlikely that the adjacent property to the east in the upgradient direction (State forest) would be a source of benzene in ground water. Please address potential sources of benzene in background well MW-7.

Final Cover – 7-Acre Cell

-During the July 2015 site inspection areas of settlement were observed in the final cover system for the 7-Acre Cell. Relatively low areas in a north to south orientation were observed. Additionally, vehicle ruts were noted in an area where standing water had ponded on the top of the 7-Acre Cell.

-The need to perform repairs to the final cover system of the 7-Acre Cell should be included in the engineering evaluation submitted as part of the permit renewal application.

Leachate Collection System

-Considerable areas of standing water were observed in Cell 3 during the July 2015 site inspection. The western portion of Cell 3 was not actively being filled and has intermediate cover with ponded water. The working face was located in the eastern portion of Cell 3 which also had ponded water. The facility was directed to pump the standing water to the leachate collection system.

- Notifications submitted by Citrus County indicate the leakage action rate has been exceeded for Cell 2 and Cell 3. Monthly notifications were most recently submitted for July, August and September 2015. The notification submitted for September 2015 is attached.

-Evaluation of the leachate collection system and the need to implement corrections should be included in the engineering evaluation submitted as part of the permit renewal application

When responding to this Request for Additional Information (RAI) if a response modifies a section of the renewal application the respective section(s) should be updated accordingly. A revised, complete version of the documents that includes all revisions made in responding to this RAI should be attached. To enable the Department to view changes to the documents, all additions should be underlined (e.g., added) and all deletions should be struck through (e.g., ~~deleted~~). Additionally, the submittal should make a positive statement that all revisions have been tracked in the aforementioned way. By this method, the Department hopes to have one final version of the respective documents that includes all revisions made during this permitting process.

Evaluation of your renewal application will be delayed until all the requested information has been received. Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time.

If your responses involve the practice of engineering or geology, as defined in Chapters 471 or 492, Florida Statutes respectively, please have that work signed and sealed by a professional engineer or professional geologist as appropriate. Also, please submit one hard copy and one electronic copy of the requested information to the Department and reference the above WACS number in your correspondence.

In order to ensure your response will be as complete as possible, the Department recommends we have a meeting, either by phone or in person, to discuss your draft submittal. If you would like to discuss any issue in this letter or schedule a meeting with the Department we are happy to do so. Please feel free to contact either Phil Ciaravella at Philip.Ciaravella@dep.state.fl.us (850-245-8742) myself at henry.freedenberg@dep.state.fl.us or using the signature block information

Sincerely,



Henry Freedenberg PE, PG

Solid Waste Section

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cc: Henry Norris, Citrus County
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Steve Morgan
Richard Tedder, P.E.

Mr. Larry Brock
November 5, 2015
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Philip Ciaravella