



Board of County Commissioners

DEPARTMENT OF PUBLIC WORKS

SOLID WASTE MANAGEMENT DIVISION

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August 11, 2016

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

Re: Citrus County Central Landfill
Permit No. 21375-018-SO/01
Consent Order #05-1078
Response to Compliance Inspection 6/27/2016

Dear Ms. Madden:

This letter is in response to the comments received during the facility inspection conducted on 6/27/2016. For each comment we list FDEP's explanation of the issue and requested corrective action followed by the County's response and course of action.

CURRENT VIOLATIONS:

Question 1.6

FDEP's EXPLANATION:

The "1st SA 2016 Groundwater Monitoring Report" (GWMR) indicated that the most likely source of VOC's in the groundwater is attributed to the presence of landfill gas specifically in MW-7 (BG), MW-19 (AS), and MW-21 (CO). The report also indicated that the groundwater quality in the vicinity of MW-7 was not attributed to a discharge of leachate from the lined disposal area (Phase I/II/III). Additionally this report indicated impacts to groundwater quality in MW-7 were not from an offsite source.

FDEP's CORRECTIVE ACTION:

Supplemental assessment activities need to be completed and/or implemented adjacent to MW-19 to define vertical extent of groundwater impacts, in accordance with consent order (CO) #05-1078. The occurrence of groundwater impacts at locations not addressed by the CO# 05-1078 (MW-7 & MW-21) also need to be evaluated. Additionally MW-7 and MW-21 (not addressed in consent order) will need to be evaluated in the same manner.

CITRUS COUNTY's RESPONSE:

Citrus County and our consultants met with FDEP in Tampa on August 10, 2016 to discuss the observed groundwater impacts and what steps need to be taken to address these issues. It was agreed at the meeting that Citrus County will prepare a plan to address the observed groundwater issues and submit it to FDEP for review within 90 days (by November 7, 2016). The plan will detail a phased approach with deadlines for completing each phase. The plan will include:

- Investigating the adequacy of the current in-place landfill gas migration monitoring network.
- Conducting additional assessment activities in accordance with the Consent Order to determine the vertical extent of groundwater impacts around MW-19.
- Preparing modifications to the remediation system near MW-19 to increase effectiveness.
- Evaluating the effectiveness of the landfill gas venting network on the closed landfills.
- Investigating the groundwater impacts at MW-7 and MW-21.

CURRENT AREAS OF CONCERN:

Question **2.28**

FDEP's EXPLANATION:

During the most recent inspection, a sump area was observed that collected water from Cell -3. A pump was observed that is being used to move water out of the sump area into a Storm water conveyance which in turn flows to DRA-4 (it shall be noted that this Storm water conveyance runs within close proximity of MW-7 (BG)). Observed a small amount of miscellaneous litter located in the sump.

FDEP's CORRECTIVE ACTION:

The facility should take care to ensure that only non-contact water is being discharged into the storm water management system.

CITRUS COUNTY's RESPONSE:

Staff has been briefed on ensuring any windblown litter that collects in sump areas be removed immediately. Additionally, landfill staff are reviewing alternatives to reroute storm water away from MW-7 eliminating any potential risk of attributive contamination.

Question **10.12.1**

FDEP's EXPLANATION:

Access roads through the yard waste piles and around the yard waste piles appeared to be holding water. These access roads may be difficult for firefighting equipment to effectively gain access.

FDEP's CORRECTIVE ACTION:

Please ensure that all access roads through and around the SOPF area able to be traveled on by emergency equipment.

CITRUS COUNTY's RESPONSE:

Staff has been briefed on maintaining the yard waste area in a manner that promotes sufficient drainage to reduce standing water. Additionally, yard waste has been moved back to allow for a 20 foot buffer around the SOPF to ensure emergency equipment have non impeded access.

Question 2.27

FDEP's EXPLANATION:

The most recent gas monitoring event conducted at the perimeter gas probes (April 2016), reported a Zero permit LEL. However, the "1st SA 2016 Groundwater Monitoring Report: (GWMR) indicated that a combustible gas concentration of 32% by volume was measured at well MW-7 (BG). The report also indicated that landfill gas collecting in MW-7 is most likely from migrating landfill gas.

FDEP's CORRECTIVE ACTION:

The adequacy of the gas venting system in the lined and unlined portions of the facility needs to be evaluated.

CITRUS COUNTY's RESPONSE:

The County is already moving forward with expanding the active gas extraction system into the Cell 3 area. We will also be reviewing the adequacy of the landfill gas venting network on the closed portion of the facility as part of the phased plan to address the observed groundwater issues. A discussion of the adequacy of the gas venting system at the facility will be included with the phased plan that will be submitted to FDEP by November 7, 2016.

PRE-EXISTING AREAS OF CONCERN:

Question 1.6

FDEP's EXPLANATION:

Well MW-10 exceeded the groundwater standard for Benzene and Vinyl Chloride since the Jan. 2013 sampling event. Well MW-19 exceeded the groundwater standard for Benzene, Vinyl Chloride, and Methylene Chloride for samples collected during Jan. 2015.

Background well MW-7 exceeded the groundwater standard for Benzene since the Jan. 2014 sampling event.

FDEP's CORRECTIVE ACTION:

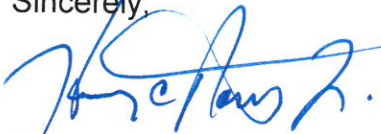
Impacts to groundwater quality shall be included in the monitoring plan evaluation report required by Spec. Cond. #E.11.a., of permit #21375-018-SO/01, due Oct. 15, 2015, as part of the operating permit renewal application.

CITRUS COUNTY's RESPONSE:

The monitoring plan evaluation report was submitted with the operating permit renewal application as required by the permit. The County responded to additional FDEP comments concerning the observed groundwater issues as requested in the November 5, 2015 Request for Additional Information. We request that this item be removed as a Pre-Existing Area of Concern on future inspections as the requested document was submitted.

The County is moving forward to address the groundwater and landfill gas issues at the facility along with taking operational steps to mitigate storm water ponding and ensuring that no contact water migrates to the storm water conveyance system. Citrus County greatly appreciates FDEP's help and cooperation throughout this process. If you have any questions, do not hesitate to call me at 352-527-7670 or Troy Hays with Jones Edmunds & Assoc. at 352-377-5821.

Sincerely,

A handwritten signature in blue ink, appearing to read "H. Norris Jr.", is written over the word "Sincerely,".

Henry C Norris Jr.
Citrus County Solid Waste Management Director