



Board of County Commissioners

DEPARTMENT OF PUBLIC WORKS SOLID WASTE MANAGEMENT DIVISION

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June 10, 2008

Melissa Madden, Environmental Specialist
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 and 126602-002-WT/02
Response to Site Inspection Comments dated 05/09/08

Dear Ms. Madden:

This responds to the comments made on the inspection checklist during the inspection of our active landfill facility by you and Nancy Gaskin accompanied by Scott Palmer and me from Citrus County staff, on May 9, 2008 and provides some feedback to the new Inspection process.

Because this was the first day that you had used the new procedure, I wanted to provide feedback to your office from the regulated community perspective.

- Entering items in the computer during the inspection seemed to take longer than the previous pen and paper version.
- The time between the inspection and receipt of the report, at over two weeks, seems rather long. There are several impacts on the facility of this delay. First, there is nothing to show to staff (both subordinates and our supervisors) for immediate reporting, feedback and corrective action. We are finding that remembering the exact conditions and locations at the time of the inspection are difficult when preparing the response.
- Are the photographs you took during the inspection available for us to review?
- Because the format of the new report is slightly different than the paper forms, we signed a report that we really had not seen. While we accompanied you for this inspection, and heard your comments, we were surprised to see the initial cover issue listed as a violation. It would be good to have a printout of a "dummy" inspection to show to a facility what the new format is so that they could ask questions about the category of the items being noted.
- Is the inspection form intended to be a Notice of Violation? Or any other official enforcement notice?
- We believe that after the new equipment, software and process are familiar to all concerned, that the process should be an improvement, particularly with timely submission of the report to the facility.

Dept. of Environmental
Protection
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Southwest District

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Your comments, including inspection section and permit specific condition citation, are shown in *italics* followed by our response.

OPEN VIOLATIONS

Significance Level: Minor

Harm Level: Moderate

Deviation: Moderate

Question Number: 2.20

Area: Phase II Landfill

Question: Is the frequency, amount and quality of initial cover, as required? 62-701.500(7)(e)

Rule: 62-701.500(7)(e)

Section: LANDFILL OPERATION AND MAINTENANCE

Explanation: Flagging resulting from insufficient initial cover, was observed in the active area outside the traffic pattern. This flagging was observed in areas that had not been active for weeks, according to facility staff.

Corrective Action: Specific Condition C.11.a.

Operation Plan Section 7.5

We do not dispute that flagging was observed. However, we believe that the facility is in compliance with the rule requirements that initial cover be applied daily and for the amount of initial cover material applied. We regularly measure a volume of the 50:50 mix of soil and mulch to equal a six-inch layer over the area of the working face and apply that amount.

Likewise we do not dispute that there were some areas that should have received intermediate cover, which had not been completed within the 7-day time requirement in the rule. All areas that needed intermediate cover have been completed. A photo pair (#1A,1B) is attached showing the current condition of the Phase 2 fill area.

We will be submitting a minor permit modification application within a few weeks that will include an additional form of alternate daily cover for consideration by the Department. We feel that this spray-on slurry may give better coverage while limiting the volume of material needed, thus making more efficient use of constructed fill space. Meanwhile, we will work on getting a more even and thorough covering of waste with daily/intermediate cover material as currently allowed in our permit.

OPEN AREAS OF CONCERN

Question Number: 2.40

Question: Are all specific conditions in the permit being followed? 62-701.320(1)

Rule: 62-701.320(1)

Section: LANDFILL OPERATION AND MAINTENANCE

Explanation: No visible liner stakes observed at edge of liner.

Corrective Action: Specific Condition C.13.1.e.

A row of tires has been placed along the north edge of the liner between Phase 2 and the unlined area used for stormwater collection. Photo #2 shows this set of markers.

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Question Number: 2.8

Area: CCC

Question: Are the following prohibited wastes or special wastes properly controlled, managed and disposed? (Check any that are Not OK)

Hazardous waste 62-701.300(4)

Biomedical waste 62-701.300(6)

Yard trash 62-701.300(8)(c)

Whole waste tires 62-701.300(8)(e)

Used oil, except as exempted 62-701.300(11)

Lead-acid batteries, mercury-containing switches and lamps in WTEs 62-701.300(9)

PCB wastes 62-701.300(5)

Lead-acid batteries 62-701.300(8)(a)

White goods 62-701.300(8)(d)

Liquids 62-701.300(10)

Rule: 62-701.300(8)(d), 62-701.300(6), 62-701.300(8)(a), 62-701.300(9), 62-701.300(10), 62-701.300(5), 62-

701.300(11)(b), 62-701.300(11)(a), 62-701.300(8)(c), 62-701.300(8)(e), 62-701.300(4)

Section: SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(16))

Explanation: DEP staff observed a ballast in the scrap metal pile.

Corrective Action: Please assure that only clean scrap metal is collected in the scrap metal storage area.

Staff who work in the citizen service area have been informed to look for ballasts. Those items will be removed and placed in the household hazardous waste area in a segregated container for proper management by our hazardous waste TSDF contractor.

Question Number: 2.8

Area: CCC

Question: Are the following prohibited wastes or special wastes properly controlled, managed and disposed? (Check any that are Not OK)

Hazardous waste 62-701.300(4)

Biomedical waste 62-701.300(6)

Yard trash 62-701.300(8)(c)

Whole waste tires 62-701.300(8)(e)

Used oil, except as exempted 62-701.300(11)

Lead-acid batteries, mercury-containing switches and lamps in WTEs 62-701.300(9)

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701.300(11)(b), 62-701.300(11)(a), 62-701.300(8)(c), 62-701.300(8)(e), 62-701.300(4)

Section: SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(16))

*Explanation: Fluorescent bulbs were observed stored in open, unlabeled containers.
Corrective Action: Please assure that these bulbs are stored in closed labeled containers. The containers should only be open when adding or removing bulbs.*

Fluorescent bulb collection tubes accessible to the public have been labeled. See attached photo #3. Those tubes are emptied daily by staff and the bulbs are packed inside the labeled cardboard containers inside the shed which is not accessible to the public. While we agree that any liquid hazardous waste should be placed in a container which is closed at all times except for when a trained person is adding material, we do not understand the requirement for closing the boxes. The danger with bulbs is releasing the mercury vapor or dust into the atmosphere by breaking the bulb. The shed and the box provide the physical protection from breakage. Handling the boxes multiple times to secure and reopen them provides more opportunity for breakage of the bulbs. A closed cardboard box will not prevent atmospheric release of the vapor.

Question Number: 2.8

Area: HHW

Question: Are the following prohibited wastes or special wastes properly controlled, managed and disposed? (Check any that are Not OK)

Hazardous waste 62-701.300(4)

Biomedical waste 62-701.300(6)

Yard trash 62-701.300(8)(c)

Whole waste tires 62-701.300(8)(e)

Used oil, except as exempted 62-701.300(11)

Lead-acid batteries, mercury-containing switches and lamps in WTEs 62-701.300(9)

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Lead-acid batteries 62-701.300(8)(a)

White goods 62-701.300(8)(d)

Liquids 62-701.300(10)

Rule: 62-701.300(8)(d), 62-701.300(6), 62-701.300(8)(a), 62-701.300(9), 62-701.300(10), 62-701.300(5), 62-

701.300(11)(b), 62-701.300(11)(a), 62-701.300(8)(c), 62-701.300(8)(e), 62-701.300(4)

Section: SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(16))

Explanation: Several drums of hazardous waste were stored outside of the containment curbing in the house hold hazardous waste collection area.

Corrective Action: Please place these drums in containment pursuant to Specific Condition C.9.b.5

Operations Plan Appendix A - Appendix 5 Section II.A.

We do not dispute that some drums were not in the proper area. Some of those drums were empty at the time; however staff has been directed to store drums only on sections of the slab that are within the containment curbing. Drums are now appropriately stored. As shown in photo #4.

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Question Number: 2.13

Question: Is the operation plan substantially followed? 62-701.500(2)

Rule: 62-701.500(2)

Section: LANDFILL OPERATION AND MAINTENANCE

Explanation: see above

Corrective Action: see above

Question Number: 2.40

Question: Are all specific conditions in the permit being followed? 62-701.320(1)

Rule: 62-701.320(1)

Section: LANDFILL OPERATION AND MAINTENANCE

Explanation: See above referenced Specific Conditions and Corrective Actions

Corrective Action: See Previous

Our understanding is that these two items are marked automatically if any other item is marked in the "no" column, therefore our responses to the various items constitute our response to these as well.

Question Number: 2.22

Area: Phase II Landfill

Question: Is litter controlled and are litter control devices maintained? 62-701.500(7)(i) and (11)(f)

Rule: 62-701.500(7)(i), 62-701.500(11)(f)

Section: LANDFILL OPERATION AND MAINTENANCE

Explanation: Litter was observed in active area and along east and western access roads. DEP staff also observed minor litter on the south slope of Phase I.

Corrective Action: Specific Condition C.1.g.3.

Operation Plan 7.9

We do not dispute that at the time of the inspection, litter was observed. We have one employee whose primary duty it is to collect litter and attends to that 5 days per week, often all day. We sometimes have an inmate to assist. However particularly when it is dry they cannot keep up. All staff have been alerted that if there is time between their other primary duties to assist in the litter pickup effort.

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

Yours truly,

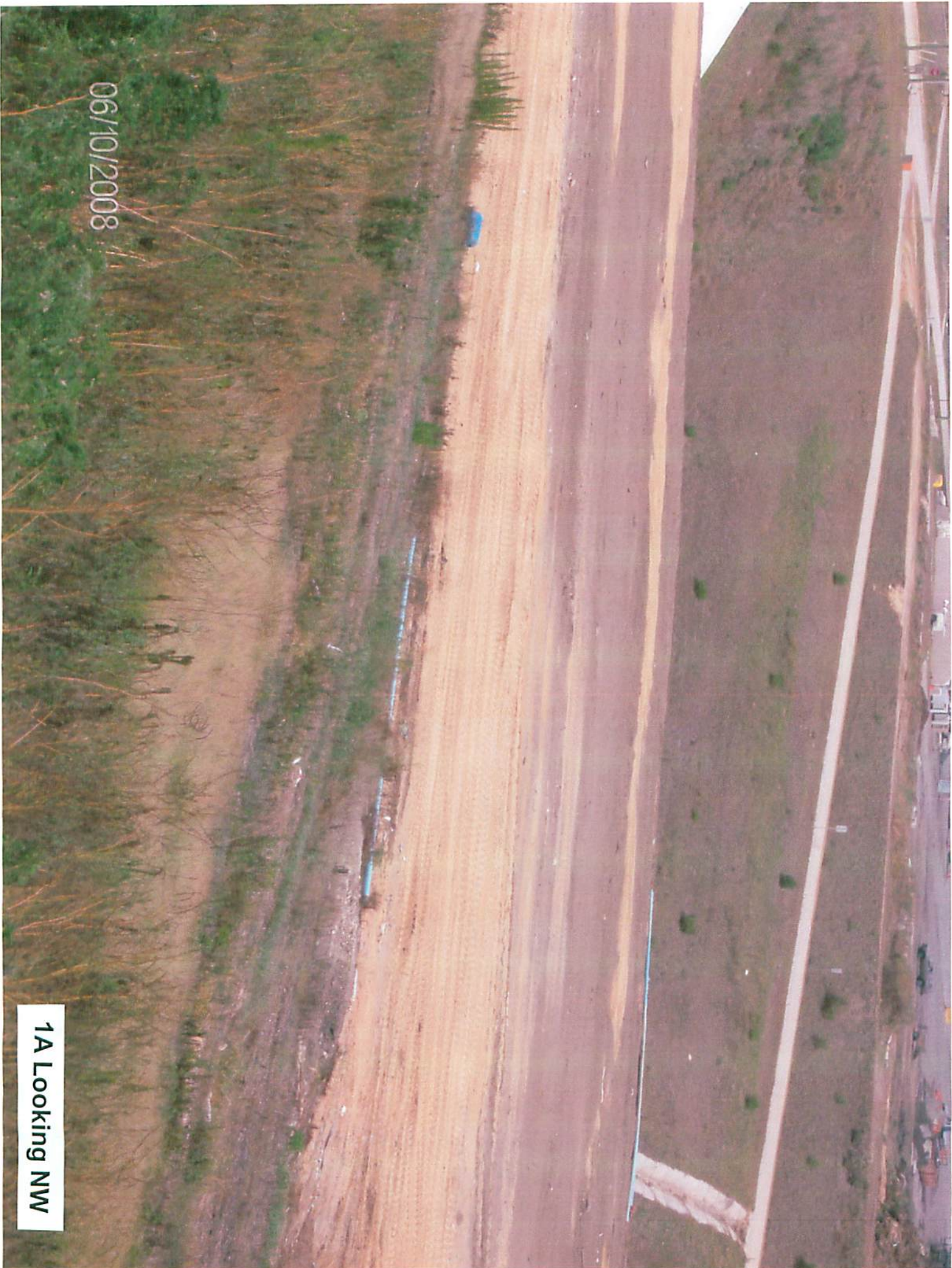


Susan Metcalfe, P.G.
Director

CC: Michael K. Arnold, Assistant Director, Public Works Department
SWM staff

06/10/2008

1A Looking NW



06/10/2008

1B Looking N



06/10/2008



Spent Fluorescent Lamps

4 FOOT
LAMPS

Spent Fluorescent Lamps

4 FOOT
LAMPS

Spent Fluorescent Lamps

Spent Fluorescent Lamps

8 FOOT
LAMPS

06/10/2008

3

06/10/2008



4