



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway, Suite 101
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

September 28, 2017

Kimberly Byer, P.G., Division Director
Hillsborough County Public Works Department – Solid Waste Management Division
332 N. Falkenburg Rd.
Tampa, Florida 33619
ByerK@hillsboroughcounty.org

Re: Requirement to Comply with Chapter 62-780, Florida Administrative Code &
Consent Agreement OGC No. 17-0058 Corrective Action Plan Comments
Hillsborough Southeast County Landfill
Facility ID No. 41193
Hillsborough County

Dear Ms. Byer:

A routine inspection was conducted at your facility on August 16, 2017 under the authority of Section 403.091, Florida Statutes (F.S.). During this inspection and subsequent file review, possible violations of Chapter 403, F.S., Chapter 62-701, Florida Administrative Code (F.A.C.), and Chapter 62-550, F.A.C. were observed. The inspection report is attached for your records.

During the file review associated with the above-referenced inspection, Department personnel noted that violations of groundwater standards exist at the zone of discharge for Phases I-VI of the landfill. This has been attributed to leachate releases from the landfill. The County first reported changes in water quality in the detection well TH-67 located adjacent to Phase II in February of 2016. It has been 20 months since the County began investigating these issues. The Department had approved the County to conduct various investigations as to the source of the discharges in lieu of initiating evaluation monitoring in accordance with Rule 62-701.510(6)(a), F.A.C. At that time, the Department and County agreed to increase sampling frequency at select locations and agreed that installation of an additional detection well, TH-79, north of TH-67 would be valuable in determining the extent of the plume associated with the leachate discharges. Further discussions between the County and the Department established that compliance wells were not necessary at the time; however, the County contacted the Department on February 27, 2017 and indicated that they intended to install wells downgradient of TH-67 and TH-79 at the zone of discharge. The Department confirmed that these locations were appropriate to monitor the surficial aquifer at the facility and did not object to their installation on March 2, 2017. The County installed compliance wells TH-80 and TH-81 at the edge of the

zone of discharge, approximately 100 feet from the edge of waste of the Phase II disposal area and assessment well, TH-82, located approximately 150-175 feet from the edge of waste on March 9-10, 2017.

The County provided *Analytical Data Reports for the Supplemental Sampling* in accordance with Paragraph 10 of the Consent Agreement OGC No. 17-0058 for Quarter 1 2017 on September 1, 2017; Quarter 2 2017 on September 5, 2017 and preliminary raw data for the Quarter 3 2017 event on September 14, 2017. All datasets appear to indicate the presence of constituents of concern which exceed Department water quality standards at the zone of discharge. The reports summarize that “The area of impacted groundwater appears to have been delineated by the installation of the additional monitoring wells, and the water quality observed in the three new wells aligns well with the 2016 geophysical investigation which depicts a limited area of groundwater impacts. The plume has been adequately delineated.” However, based on Department review of the submitted contour maps, the Department disagrees that the impacted areas have been adequately delineated based on seasonal fluctuations in groundwater flow. Additionally, while the concentrations of contaminants do appear to fluctuate seasonally with water levels within the surficial aquifer, there is no indication at this time that the discharge has ceased and therefore cannot be fully delineated until the source of the discharge is identified and the discharge has ceased.

Therefore, the County shall initiate evaluation monitoring in accordance with Rule 62-701.500(6)(a), F.A.C. at monitoring wells TH-67, TH-79, TH-80, and TH-81 upon receipt of this letter, in addition to the requirements of Paragraph 10 of Consent Agreement OGC No. 17-0058. Additionally, because contaminants which exceed Department water quality standards have been verified at the zone of discharge, the County shall also initiate corrective actions in accordance with Rule 62-701.500(6)(c), F.A.C. at affected locations.

Rule 62-701.500(6)(c), F.A.C. requires that corrective actions be implemented in accordance with applicable provisions of Chapter 62-780, F.A.C. when contaminants are discovered outside the zone of discharge. On April 17, 2005, through authority granted by Chapter 376.30701, Florida Statutes (“F.S.”), the Department adopted Chapter 62-780, Florida Administrative Code (“F.A.C.”), establishing a process and time schedule for assessing and remediating contaminated sites. All persons who have legal responsibility for site rehabilitation, pursuant to Chapters 376 or 403, F.S., are required to comply with the provisions of this rule and are subject to enforcement to compel such compliance.

Please provide documentation that you have initiated a site assessment within 60 days of receipt of this letter. Please submit a site assessment report (SAR) within 270 days of receipt of this letter.

Additionally, the County submitted a Corrective Action Plan (Plan) in accordance with Paragraph 9.a of Consent Agreement OGC No. 17-0058 on June 27, 2017. At this time, the **Plan is not approved**. The objective of the Plan was to address the inadequacies of the leachate collection system and provide a proposal for evaluating and reducing leachate levels in Phases I-VI. The Plan did not appear to address the inadequacies of the leachate collection system or its effectiveness in removing leachate from the landfill long-term. The Plan was divided into four stages. The County has indicated that they have completed most of the proposed actions for evaluating and removing

leachate from the landfill outlined in Stages 1 and 2. Some of the proposed construction activities were either abandoned or modified from the original proposal and the Plan does not reflect current conditions. The County has submitted weekly updates to the Department to summarize the modifications. The Plan has become outdated from the original submittal because of these deviations. The Plan also did not provide any performance standards for measuring the effectiveness of each proposed activity. The County indicated via September 22, 2017 update that they are currently into Stage 3 of the Plan which consists of continuing to collect data to determine the effectiveness of the leachate removal efforts.

As of the date of this letter, it does not appear that dewatering efforts have been effective in removing leachate from the landfill and so the dewatering plan should be re-evaluated. Most of the piezometers continue to show increasing head on the liner in depths in excess of the Approved Operating Limit (currently 12 inches). The Department is concerned, based on the continued presence of contaminants in groundwater discussed above and with rising leachate head over liner as documented in Series 2 piezometers, that the landfill continues to discharge leachate beyond the leachate collection system. To date, the County has not identified the source of the discharge. Additional investigation into the source of the discharge may include an evaluation of the integrity of the side liner or other containment features as necessary. The Plan and the Consent Agreement also discuss the County's submittal of an Alternate Procedure to address what the Approved Operating Limit will be. The Department has not received this request for Alternate Procedure to date. To allow the County flexibility in addressing corrective actions and for resolving the non-compliance issues, the Department proposes that a performance based plan which provides a generic description of the completed and proposed actions, the monitoring locations and frequency, and milestones for achieving compliance though those various actions may be more appropriate. The Department requests a meeting to discuss preparation of a revised Plan.

Please contact Steven Tafuni, at (813)470-5792, within **15 days** of receipt of this letter to arrange a meeting to discuss these issues. We look forward to your cooperation in resolving this matter.

Sincerely,



Mary Yeargan, P.G., Director
Southwest District
Florida Department of Environmental Protection

MY/mm

Cindy Pelley, Hillsborough County Public Works Dept., pelleyc@hillsboroughcounty.org
Dave Adams, Hillsborough County Public Utilities Dept., adamsds@hillsboroughcounty.org
Ron Cope, HCEPC, cope@epchc.com
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Hillsborough Southeast County Landfill

Facility ID No.:41193

Page 4 of 4

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Brad Butler, FDEP, Bradley.butler@dep.state.fl.us



**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: SOUTHEAST COUNTY SLF (PICNIC LF)

On-Site Inspection Start Date: 08/16/2017

On-Site Inspection End Date: 08/16/2017

WACS No.: 41193

Facility Street Address: 15960 CR 672

City: LITHIA

County Name: HILLSBOROUGH

Zip: 33547

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Javier Ramirez, Engineering Specialist II

Other Participants: Melissa Madden, Environmental Consultant; Benjamin Hsu, Engineering Specialist I; Justin Chamberlain, Environmental Specialist III; Cindy A. Pelley, General Manager II

INSPECTION TYPE:

Routine Operation Inspection for WPF - Waste Tire Processing Facility

Routine Operation Inspection for Landfill - Class I

ATTACHMENTS TO THE INSPECTION CHECK LIST:

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

1.0 - SECTION 1.0 - FILE REVIEW

2.0 - SECTION 2.0 - LANDFILL OPERATION AND MAINTENANCE

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

Inspection Date: 08/16/2017

1.0 - SECTION 1.0 - FILE REVIEW

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	FILE REVIEW (Pre- or Post-Inspection, as appropriate.)	Ok	Not Ok	Unk	N/A
1.1	For landfills and C&D disposal facilities, does the facility have a current plan for the method and sequence of filling wastes? 62-701.500(2)(f) for landfills; 62-701.730(7)(a) for C&D debris sites	✓			
1.2	For landfills, are the following records being reported to the Department?(Check any that are Not OK) <input type="checkbox"/> Waste reports (annually) 62-701.500(4) <input type="checkbox"/> Annual estimate of remaining life 62-701.500(13)(c)	✓			
1.3	Is gas monitoring being performed as required by the permit? 62-701.500(9), 62-701.530(2)	✓			
1.4	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)(c)	✓			
1.5	Is water quality sampling and testing performed according to standard procedures and at the required frequencies? 62-701.510(2) for landfills; 62-701.730(8) and 62-701.730(10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.	✓			
1.6	Do the results of the water quality testing suggest there may be adverse impacts to water quality from the operation of the solid waste facility? 62-701.510(3) and (4); 62-701.730(4)(c) and (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.		✓		
1.7	For closed landfills and C&D disposal facilities with final elevations higher than 20 feet above grade, has a final survey report verifying the final elevations and contours of the facility been submitted to the Department? 62-701.600(6)(b), 62-701.730(9)(e)	✓			
1.8	Is financial assurance adequate? 62-701.630 for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(a) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities. NOTE: The Solid Waste Financial Coordinator in Tallahassee can assist with this information.	✓			
1.9	Are cost estimates current and adjusted every year? 62-701.630(4) for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(b) and 62-713.600(6)(c) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities.	✓			
1.10	For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by February 1st of each year? 62-701.730(12)				✓
1.11	For C&D recycling facilities with no disposal, is an Annual Report for the recycling facility submitted to the Department by February 1st of each year? 62-701.710(8)(b)				✓
1.12	For compost facilities, has the compost product been sampled and analyzed every 20,000 tons or every 3 months (whichever is sooner)? 62-709.530(1)				✓
1.13	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				✓

Inspection Date: 08/16/2017

2.0 - SECTION 2.0 - LANDFILL OPERATION AND MAINTENANCE

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18))	Ok	Not Ok	Unk	N/A
2.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility. 62-701.300(1)(a)	✓			
2.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
2.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
2.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event.) 62-701.300(2)(d)	✓			
2.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
2.5	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
2.6	Are the following unauthorized wastes or special wastes properly controlled, managed and disposed? (Check any that are Not OK) <input type="checkbox"/> Hazardous waste 62-701.300(4) <input type="checkbox"/> Biomedical waste 62-701.300(6) <input type="checkbox"/> Yard trash 62-701.300(8)(c) <input type="checkbox"/> Whole waste tires 62-701.300(8)(e) <input type="checkbox"/> Regulated asbestos waste 62-701.520(3), 62-701.730(19) <input type="checkbox"/> Used oil and oily wastes, except as exempted 62-701.300(11) <input type="checkbox"/> PCB wastes 62-701.300(5) <input type="checkbox"/> Lead-acid batteries 62-701.300(8)(a) <input type="checkbox"/> White goods 62-701.300(8)(d) <input type="checkbox"/> Liquids 62-701.300(10) <input type="checkbox"/> CCA treated wood 62-701.300(14)	✓			
2.7	Are only permitted waste types disposed at facility? 62-701.340(2), 62-701.500(6)(a), 62-701.500(2)(c)	✓			
Item No.	LANDFILL OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
2.8	Is there a trained operator on-site at Class I and III landfills when receiving wastes? 62-701.500(1)	✓			
2.9	Is there at least one trained spotter at each working face when receiving wastes at Class I and III landfills? 62-701.500(1)	✓			

Inspection Date: 08/16/2017

Item No.	LANDFILL OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
2.10	Are the following records or plans current and available on-site? (Check any that are Not OK) <input type="checkbox"/> Training Plan 62-701.320(15)(a) <input type="checkbox"/> Operating Plan 62-701.500(2) <input type="checkbox"/> Waste weight records 62-701.500(4) <input type="checkbox"/> Precipitation records 62-701.500(8)(g) <input type="checkbox"/> Load-checking program records 62-701.500(6)(a) <input type="checkbox"/> Training records 62-701.320(15)(a) <input type="checkbox"/> Operation record 62-701.500(3) <input type="checkbox"/> Quantity of leachate 62-701.500(8)(f)	✓			
2.11	Is the operation plan substantially followed? 62-701.500(2)	✓			
2.12	Is incoming waste weighed? 62-701.500(4)(a) and 62-701.500(2)(d)	✓			
2.13	Is the method and sequence of filling waste according to plans? 62-701.500(2)(f)	✓			
2.14	Is access properly controlled to prevent unauthorized waste disposal? 62-701.500(5)	✓			
2.15	Is waste compacted as required? 62-701.500(7)(a)	✓			
2.16	Are the working face and side slopes above ground graded to a slope no greater than 3 feet horizontal to 1 foot vertical rise? 62-701.500(7)(c)	✓			
2.17	Is a narrow working face practiced? 62-701.500(7)(d)	✓			
2.18	Is the frequency, amount and quality of initial cover, as required? 62-701.500(7)(e)	✓			
2.19	Is the frequency, amount and quality of intermediate cover, as required? 62-701.500(7)(f)	✓			
2.20	Is litter controlled and are litter control devices maintained? 62-701.500(7)(i) and 62-701.500(11)(f)	✓			
2.21	Is erosion control adequate? 62-701.500(7)(j)	✓			
2.22	Is the leachate collection and removal system maintained and operated as required? 62-701.500(2)(j), 62-701.500(8)(b) and 62-701.500(8)(h)	✓			
2.23	Is leachate disposed of or treated as required? 62-701.500(8)(b), 62-701.500(8)(c) and 62-701.500(8)(d)	✓			
2.24	If leachate recirculation is practiced at the facility, is it done in accordance with Department requirements and the Operation Plan? 62-701.400(5)				✓
2.25	Is gas controlled to not cause objectionable odors beyond the property boundary? 62-701.530(3)(b)	✓			
2.26	Is gas controlled to not allow combustible gas concentrations to exceed specified limits? 62-701.530(3)(a)	✓			
2.27	Are gas vents intact and functioning properly? 62-701.500(9), 62-701.530(1)(a)3	✓			
2.28	Is mixing of leachate and stormwater prevented or minimized? 62-701.500(10), 62-701.400(9)(b)	✓			
2.29	Is stormwater management system maintained and operated as required? 62-701.500(10)	✓			
2.30	Is there sufficient operating equipment? 62-701.500(11)(a)	✓			
2.31	Is there sufficient reserve equipment (or other arrangements)? 62-701.500(11)(b)	✓			
2.32	Are communication facilities adequate? 62-701.500(11)(c)	✓			
2.33	Are approved dust control methods adequate? 62-701.500(11)(d)	✓			

Inspection Date: 08/16/2017

Item No.	LANDFILL OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
		✓			
2.34	Are fire protection and fire fighting capabilities adequate and operational? 62-701.500(11)(e)	✓			
2.35	Are there required signs for operational directions and public information? 62-701.500(11)(g)	✓			
2.36	Are all-weather access roads and inside perimeter roads properly maintained? 62-701.500(12)	✓			
2.37	Are groundwater wells intact and properly maintained? 62-701.510(2)(b), 62-701.620(8)	✓			
2.38	Are all additional specific conditions (not otherwise addressed above) in the permit, Department order, or certification, if any, being followed? 62-701.320(1), 403.161, F.S.	✓			

Inspection Date: 08/16/2017

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18))	Ok	Not Ok	Unk	N/A
9.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a)	✓			
9.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
9.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
9.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event) 62-701.300(2)(d)	✓			
9.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
9.5	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
9.6	If the facility accepts tires from the public, is a sign posted at the facility entrance stating operating hours, cost of disposal and site rules? 62-711.540(1)(a)	✓			
9.7	Are operations involving the use of open flames conducted no closer than 25 feet of a waste tire pile? 62-711.540(1)(b)	✓			
9.8	If the facility accepts tires from the public, is an attendant always present on site when the site is open for business? 62-711.540(1)(c)	✓			
9.9	Are fire protection services assured through notification to local fire protection authorities? 62-711.540(1)(d)	✓			
9.10	Is an annual fire safety survey conducted? 62-711.540(1)(d)	✓			
9.11	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)	✓			
9.12	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e)	✓			
9.13	Does the EPM contain the following information? (Check all that are Not OK) <input type="checkbox"/> Contact names and numbers 62-711.540(1)(e)1 <input type="checkbox"/> List of emergency response equipment and locations on-site 62-711.540(1)(e)2 <input type="checkbox"/> Procedures to be followed in the event of a fire 62-711.540(1)(e)3	✓			
9.14	Is the operator at the facility maintaining records of the quantity of waste tires received at the site, stored at the site, and shipped from the site? 62-711.540(1)(g) and 62-711.400(5)	✓			
9.15	If the operator of the site is not the owner of the property, has written authorization been obtained from the property owner to operate the facility? 62-711.540(1)(h)	✓			
9.16	Is adequate communications equipment available at the site? 62-711.540(1)(i)	✓			

Inspection Date: 08/16/2017

Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
9.17	Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711.540(1)(j)	✓			
Item No.	WASTE TIRE FACILITY - STORAGE INDOORS	Ok	Not Ok	Unk	N/A
9.18	Are waste tire piles more than 50 feet in width? 62-711.540(2)(a)				✓
9.19	Are waste tire piles along a wall more than 25 feet in width? 62-711.540(2)(a)				✓
9.20	Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b)				✓
9.21	Is there less than 3 feet of clearance between the top of storage to sprinkler detectors or roof structures? 62-711.540(2)(c)				✓
9.22	Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(d)				✓
9.23	If waste tires are stored up to 15 feet high, do walls between adjacent warehouse areas and between manufacturing and warehouse areas have at least a four-hour fire rating? 62-711.540(2)(e)				✓
9.24	If waste tires are stored over 15 feet high, do walls between manufacturing and warehouse areas have a fire rating of not less than six hours and do steel columns have one-hour fireproofing? If the top of storage exceeds 20 feet in height, do columns and their connections with other structural members have two-hour fireproofing? 62-711.540(2)(f)				✓
9.25	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(2)(h)				✓
Item No.	WASTE TIRE FACILITY - STORAGE OUTDOORS	Ok	Not Ok	Unk	N/A
9.26	Is the waste tire site operated within 200 feet from a body of water? 62-711.540(3)(a)	✓			
9.27	Does the waste tire pile have a width less than 50 feet? 62-711.540(3)(b)	✓			
9.28	Does the waste tire pile have an area less than 10,000 sq. ft? 62-711.540(3)(b)	✓			
9.29	Does the waste tire pile have a height less than 15 feet? 62-711.540(3)(b)	✓			
9.30	Is there a 50 feet wide fire lane around the perimeter of the waste tire pile? 62-711.540(3)(c)	✓			
9.31	Is there unobstructed access to the fire lane? 62-711.540(3)(c)	✓			
9.32	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d)	✓			
9.33	Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711.540(3)(f)	✓			
9.34	Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711.540(3)(e)	✓			
9.35	Are residuals contained on-site and disposed of in a permitted solid waste management facility or properly recycled? 62-711.540(5)	✓			
9.36	Does the waste tire site qualify for the exceptions to the technical and operational standards as allowed by rule? 62-711.540(6)	✓			
Item No.	WASTE TIRE FACILITY - COLLECTION CENTER	Ok	Not Ok	Unk	N/A
9.37	Are no more than 1,500 tires at the collection center at any one time? 62-711.550(1)(a)				✓
9.38	Are all waste tires, which are not used tires, removed from site yearly for recycling, processing, or disposal? 62-711.550(1)(b)				✓

Inspection Date: 08/16/2017

Pre-existing Areas Of Concern:

Rule: 62-701.510(3), 62-701.510(4), 62-701.730(10), 62-701.730(8)(f), 62-713.400(3)

Question Number: 1.6

Explanation: As a result of the findings of the 1st Semi-Annual 2016 Water Quality Monitoring Report and subsequent confirmation sampling results, exceedances of groundwater standards were confirmed at TH-67. This well is located near the southeast corner of Phase II, extends to the surficial aquifer, and has been designated as a detection well. The parameters of interest are pH, total dissolved solids (TDS), chloride, and sodium.

Update for 2017 Inspection: The County continues to assess water quality impacts in the area surrounding TH-67. The County has installed additional monitoring locations (TH-79, 80, 81 and 82) and is conducting supplemental quarterly sampling at these plus existing locations to monitor impacts associated with elevated leachate levels within the Phases I-VI landfill in accordance with Paragraph 9.g of Consent Agreement OGC No. 17-0058. The most recent supplement event, sampled May 2017 indicates exceedances of a primary drinking water standard, Sodium at TH-67, TH-79, and TH-81, and of secondary drinking water standards, TDS and Chloride, at TH-67, TH-79, TH-81 and TDS at TH-80. TH-67 and TH-79 are detection wells located ~50 feet from the edge of waste. TH-80 and TH-81 are located at the edge of the zone of discharge (100' ZOD) for Phase I-VI.

Corrective Action: The County shall initiate evaluation monitoring in accordance with Rule 62-701.500(6)(a), F.A.C. at monitoring wells TH-67, TH-79, TH-80, and TH-81 upon receipt of this letter in addition to the requirements of Paragraph 10 of the Consent Agreement OGC No. 17-0058. Additionally, since contaminants which exceed Department water quality standards have been verified at the zone of discharge, the County shall also initiate corrective actions in accordance with Rule 62-701.500(6)(c), F.A.C. at affected locations.

Attachments:

TH-67



COMMENTS:

Item 1.5 - While ADAPT Data was provided for supplemental events conducted Q1 and Q2 2017, the accompanying reports have not yet been provided to the Department. In accordance with Paragraph 10 of OGC Case No. 17-0058, the County shall submit the results of the supplemental ground water sampling events to the Department in accordance with the requirements of Rule 62-701.510(8)(a), F.A.C. (including ADaPT files), within 60 days from completion of laboratory analyses. Additionally, Q2 2017 effluent data, due July 15, 2017 was not yet received.

Item 2.6 - At least three whole waste tires were observed in the working face. The operator indicated that they likely came in with ash and would be removed.

Inspection Date: 08/16/2017

Item 2.10 - The Department reviewed the following documents during the inspection: load inspections, daily landfill inspection reports, and daily leachate pump meter field readings forms.

Item 2.13 - The facility was filling in Phase IV, Lift 16A at time of inspection. A recent permit modification was issued to address a sequence of fill modification to avoid filling in Phase II (leachate accumulation) and potentially encourage settlement of LCS to restore flow from Phases I,II, III area to PPS-B.

Item 2.22 - The Department and County recently executed a Consent Agreement (OGC No. 17-0058) to address elevated leachate levels in Phases I-VI and potential discharges from the system. The Department is in receipt of a Corrective Action Plan in accordance with Paragraph 9. Additional information to follow under separate cover.

During the inspection, the leachate sump for the compost pad on top of Sections 7, 8, and 9 was observed to have been clogged and ponded leachate was observed. This sump was cleaned on 8/23/17 and photos of the cleared sump were submitted to the Department. Leachate from the compost sump is also pumped from this sump and discharged into the Section 9 leachate forcemain for conveyance to the leachate treatment plant. This pump was not connected at the time of the inspection due to clogging of the intake. Specific Condition C.14 of Permit and the current Composting O&M Manual does not contemplate this method of leachate removal. Please work with Tallahassee permitting staff to ensure the current configuration for leachate management associated with the composting operation is authorized.

Item 2.28 - During the inspection, the temporary leachate pump located on the south side of Phase 2, TPS-2B, appeared to be discharging from an air release valve. A majority of the leachate was contained on top of a collapsing temporary containment liner on which the pump was located, however there appeared to be a small amount of leachate discharging onto the ground within the limits of the landfill. This discharge was cleaned up and a berm was erected around the pump during the time of the inspection. In addition, the temporary leachate pump located on the east side of Phase 2, PS-2, was observed to be discharging leachate onto the ground and into the adjacent stormwater ditch due to a leaky pipe fitting. Documentation that this discharge was cleaned up, the connection repaired, and a berm erected around the pump was provided to the Department prior to the end of the inspection day. The County indicated that new containment liners would be purchased with a plan to formalize containment structures if the locations are deemed permanent.

Item 2.37 - Not all wells were inspection during this inspection. All wells observed appeared to be locked, labeled, and well protected.

ATTACHMENTS:

Working Face (Phase 3)



Phase 2 Leachate Extraction Pump



Inspection Date: 08/16/2017

Phase 2 South Temp Pump (Before)



Phase 2 South Temp Pump (After)



Phase 2 East Temp Pump (Before)



Phase 2 East Temp Pump (After)



Compost Sump (Before)



Compost Sump (After)



Inspection Date: 08/16/2017

Signed:

Javier Ramirez

PRINCIPAL INSPECTOR NAME

Engineering Specialist II

PRINCIPAL INSPECTOR TITLE



PRINCIPAL INSPECTOR SIGNATURE

FDEP

ORGANIZATION 09/01/2017
DATE

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REPRESENTATIVE SIGNATURE

Hillsborough County

ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Report Approvers:

Approver: Steve Tafuni

Inspection Approval Date: 09/27/2017
