

# FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office 13051 North Telecom Parkway #101 Temple Terrace, Florida 33637-0926 Rick Scott Governor

Carlos Lopez-Cantera Lt. Governor

> Noah Valenstein Secretary

August 10, 2018

Henry Norris, Jr. Division of Solid Waste Citrus County P.O. Box 340 Lecanto, FL 34460 henry.norris@citrusbocc.com

Re: Citrus County Central Class I Landfill Facility ID: 39859 Citrus County

Dear Mr. Norris:

Department personnel conducted a compliance inspection of the above-referenced facility on July 19, 2018. During this inspection, possible ongoing violations of Chapter 403, F.S., and Chapter 62-701, F.A.C., were discussed, including landfill gas migration and groundwater exceedances. Assessment activities as required by Final Consent Agreement #05-1078 are in progress. A copy of the inspection report is attached for your records; please note that there are several action items included in the Comments section.

The Department appreciates your cooperation in investigating and resolving the possible violations. Should you have any questions or comments, please contact Scott Borderieux at (813) 470-5758, or via e-mail at: <u>scott.borderieux@floridadep.gov</u>.

Sincerely,

Steven Tafuni Government Operations Consultant Compliance Assurance Program Southwest District Florida Department of Environmental Protection

**Enclosures: Inspection Report** 

ec: Steven Tafuni, FDEP SWD, <u>steven.tafuni@floridadep.gov</u> Scott Borderieux, FDEP SWD, <u>scott.borderieux@floridadep.gov</u> Melissa Madden, FDEP SWD, <u>melissa.madden@floridadep.gov</u> Justin Chamberlin, FDEP SWD, <u>Justin.chamberlin@floridadep.gov</u> Ray Oates, Citrus County, <u>ray.oates@citrusbocc.com</u>



Florida Department of Environmental Protection Inspection Checklist

## FACILITY INFORMATION:

Facility Name:CITRUS CENTRAL SLFOn-Site InspectionStart Date:07/19/2018On-Site InspectionEnd Date:07/19/2018WACS No.:39859Facility Street Address:3MI E LECANTO, SR44City:LECANTOCounty Name:CITRUSZip:34461

## **INSPECTION PARTICIPANTS:**

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Scott T Borderieux, Inspector

Other Participants: Melissa Madden, Inspector; Justin Chamberlain, Inspector; Henry Norris, Solid Waste Division Director; Ray Oates, Soild Waste Compliance Manager

## **INSPECTION TYPE:**

Routine Operation Inspection for Landfill - Class I

Routine Operation Inspection for WPF - Waste Tire Processing Facility

## ATTACHMENTS TO THE INSPECTION CHECKLIST:

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

## Note: Checklist items with shaded boxes are for informational purposes only.

- 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: 07/19/2018

## 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) Waste reports (annually) 62-701.500(4) 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)				~

## 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)				
	100 feet from potable water wells (except on-site)?	~			
	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)				
	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)				
	Regulated asbestos waste 62-701.520(3), 62-701.730(19)	. 21			
	Used oil and oily wastes, except as exempted 62-701.300(11)	~			
	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)				
	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)	~			
2.10	Are the following records or plans current and available on-site? (Check any that are Not OK)				
	Training Plan 62-701.320(15)(a)				
	Operating Plan 62-701.500(2)	~			
	Waste weight records 62-701.500(4)				
1					

# Inspection Date: 07/19/2018

Item No.	LANDFILL OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
	<ul> <li>Precipitation records 62-701.500(8)(g)</li> <li>Load-checking program records 62-701.500(6)(a)</li> <li>Training records 62-701.320(15)(a)</li> <li>Operation record 62-701.500(3)</li> <li>Quantity of leachate 62-701.500(8)(f)</li> </ul>	~			
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)	~			
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)	~			

Inspection Date: 07/19/2018

Item No.	LANDFILL OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
		~			
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: 07/19/2018

## 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.

ltem 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) 100 feet from potable water wells (except on-site)?	~			
	50 feet from water bodies?	Ť			
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)	~			
ltem 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)         Contact names and numbers 62-711.540(1)(e)1         List of emergency response equipment and locations on-site 62-711.540(1)(e)2         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)	>			
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)	>			

Inspection Date: 07/19/2018

Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
		~			
ltem 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)				~
ltem 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)	~			
ltem 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)				~

## **Pre-existing Violations:**

Rule: Question Number:	62-701.510(3), 62-701.510(4), 62-701.730(10), 62-701.730(8)(f), 62-713.400(3) 1.6
Explanation:	VOCs were reported above groundwater standards at MW-7 and MW-19 in the 2nd SA 2016, 1st SA 2017, 2nd SA 2017, and 1st SA 2018 Groundwater Monitoring Reports. The 1st SA 2016 Groundwater Monitoring Report attributed the VOC exceedances at these wells to landfill gas.
Corrective Action:	On 2/22/2017 prior to the inspection, DEP, Citrus County, and Jones Edmunds had a meeting to discuss landfill gas migration and groundwater exceedances at the facility. After the inspection, the facility assessed the adequacy of the existing landfill gas monitoring system and groundwater monitoring system and submitted a plan (Landfill Gas Assessment and Groundwater Delineation plan, revised 6/6/2017, received 6/9/2017) to retrofit/expand both systems to determine the extent and path of landfill gas migration and impacts to groundwater. Please submit updates on the implementation of the Landfill Gas Assessment and Groundwater Delineation plan. The results of the expanded monitoring should be used to develop a remediation plan.

#### Comments:

The Department received and reviewed the Landfill Gas Assessment and Groundwater Delineation Report transmitted November 29, 2017 by email. A meeting was held on February 15, 2018 to discuss the County's proposed methods and timeframes for remediating migrating landfill gas, the next steps for assessment of impacted groundwater monitoring wells at the site and the existing Consent Order 05-1078 status. The County received a permit modification to expand the LFG system on July 10, 2018 and is currently procuring bids and a contractor to do the work. The County is also continuing to monitor the site as outlined in the report discussed above. The Department anticipates an evaluation of the effectiveness of the expanded LFG system on groundwater in the impacted areas (MW-7 and MW-19 primarily) once the system has been installed and has been operating for some duration. Please provide updates on the progress of installation of the expanded system (eg. construction start date, completion date, certification of construction completion, etc.).

#### **Pre-existing Areas Of Concern:**

Area: Rule: Question Number:	Phase III 62-701.500(7)(d) 2.17
Explanation:	At the time of the inspection, a narrow working face was not being practiced in Phase 3, and daily and intermediate cover was sparse in places leaving waste exposed. This is the second consecutive inspection where this issue has been observed.
Corrective Action:	Documentation was provided via email on 8/3/2018 which included pictures of efforts to reduce the working face area and improve cover (including reducing the area covered by alternative daily cover). Please continue to maintain a narrow working face and apply initial and intermediate cover as required so that waste is not exposed.

#### Attachments:

Page 9 of 12

Inspection Date: 07/19/2018

Working Face (day of inspection)

Large Working Face



Working Face (8-3-18)



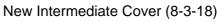
se III
′01.500(7)(e)
ł
2.17
2.17

## Attachments:

Daily Cover Extent









Page 10 of 12

Inspection Date: 07/19/2018

Area:	Phase III
Rule:	62-701.500(7)(f)
Question Number:	2.19
Explanation:	See 2.17. Leachate seepage and ponded water were observed from/on areas of inadequate intermediate cover. This should be treated as leachate (facility indicated this was already the plan).
Corrective Action:	See 2.17.

#### **Attachments:**

Ponding

Runoff and Erosion



## COMMENTS:

During the inspection, the leachate treatment plant was being demolished and the leachate tanks were being emptied for inspection/repair.

## ATTACHMENTS:

#### Tire Area



## Well MW-7



Inspection Date: 07/19/2018

# Leachate Aerator



Old Treatment Plant



Scott T Borderieux	Inspector				
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE				
State Bow					
	DEP	08/06/2018			
PRINCIPAL INSPECTOR SIGNATURE	ORGANIZATION	DATE			
Melissa Madden	Inspector				
	INSPECTOR TITLE				
NO SIGNATURE REQUIRED					
INSPECTOR SIGNATURE	DEP ORGANIZATION				
	ORGANIZATION				
Justin Chamberlain	Inspector				
INSPECTOR NAME	INSPECTOR TITLE				
NO SIGNATURE REQUIRED	252				
INSPECTOR SIGNATURE					
	ORGANIZATION				
Henry Norris	Solid Waste Division Director				
REPRESENTATIVE NAME	REPRESENTATIVE TITLE				
NO SIGNATURE REQUIRED					
	Citrus County ORGANIZATION				
NOTE: By signing this document, the Site Represe Report and is not admitting to the accuracy of any areas of concern.					
Ray Oates	Soild Waste Compliance Manager				
REPRESENTATIVE NAME	REPRESENTATIVE TITLE				
NO SIGNATURE REQUIRED	Citrus County				
REPRESENTATIVE SIGNATURE	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: 08/10/201	8			