Borderieux, Scott

From: Henry C. Norris <Henry.Norris@citrusbocc.com>

Sent: Thursday, August 23, 2018 11:23 AM **To:** Madden, Melissa; Borderieux, Scott

Cc: Ray Oates; DAN S. SHERLOCK; SAMMIE WALKER

Subject: FDEP Compliance Inspection Response

Attachments: Response to FDEP Inspection of 07.19.18.docx

Melissa / Scott, please see attached Citrus Counties response to FDEP Compliance Inspection conducted on 7/19/18. If you should have any questions please don't hesitate to give me a call.



Henry C Norris Jr Solid Waste Division Director Citrus County Board of County Commissioners 230 W. Gulf to Lake Hwy Lecanto, Fl 34461 352.527.7670

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Board of County Commissioners DEPARTMENT OF PUBLIC WORKS SOLID WASTE MANAGEMENT DIVISION

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August 23, 2018

Scott Borderieux Engineering Specialist, Compliance Assurance Section Florida Department of Environmental Protection 13051 North Telecom Parkway Temple Terrace. Florida 33637-0926

RE: Citrus County Central Class I Landfill

Facility ID: 39859

Dear Mr. Borderieux:

In response to your correspondence dated August 10th, enclosed please find the following information pertaining to the compliance inspection your department conducted at our facility on July 19, 2018.

Pre-existing Violations:

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: Volatile organic compounds (VOC's) were reported above groundwater standards at MW-7 and MW-19 in the second Semi-annual (SA) 2016 Groundwater Monitoring Report, first and second SA Reports of 2017 and first SA Report of 2018. The first SA 2016 Groundwater Monitoring Report attributed the VOC exceedances at these wells to landfill gas.

County Response: FDEP requested update on the progress of the installation of the expanded gas collection system. Jones Edmunds is finalizing the specifications and contract documents for the project and is expected to publish an Invitation to Bid for the project mid-September. Tentatively, construction of the system is projected to begin at the end of this year. The contract time will be 180 days.

Pre-existing Areas of Concern:

Area: Phase III

Rule: 62-701.500(7)(d) Question Number: 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.

Corrective Action: Documentation was provided via email on 8/3/2018 which included pictures of continuing effort to reduce 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.

County Response: Staff intends to continue to maintain a narrow working face and apply initial and intermediate cover as required so that waste is not exposed. A depiction of the additional intermediate materials transported to the area near the working face is shown in the Working Face photograph dated August 3, 2018. The County fully understands the implication of any permit violations as well as violations of a consecutive nature and intends to make adequate operational changes insuring permit conditions are followed to avoid any future violations.

Area: Phase III

Rule: 62-701.500(7)(e)
Question Number: 2.18
Explanation: See 2.17
Corrective Action: See 2.17

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 immediate cover. This should be treated as leachate (facility indicated this was

already the plan).

Corrective Action: The standing water observed by FDEP in the southwest corner of the Phase III cell was pumped to the leachate tanks and treated as leachate.

Respectfully Submitted