

## FLORIDA DEPARTMENT OF Environmental Protection

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

Jeanette Nuñez Lt. Governor

Noah Valenstein Secretary

October 30, 2019

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

Re: Warning Letter #WL19-107SW09SWD CO # 05-1078 Citrus County Central Class I Landfill Facility ID: 39859 Citrus County

Dear Mr. Norris:

A compliance inspection was conducted at your facility on October 3, 2019. During this inspection, possible violations of Chapter 403, Florida Statutes, Chapter 62-701, Florida Administrative Code (F.A.C), and Solid Waste Permit No. 21375-025-SO-01 (including 21375-026-SO-MM) were observed. Please see the attached inspection report.

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 403.121 and 403.161, Florida Statutes.

Please contact Scott Borderieux at 813-470-5758 or at <u>scott.borderieux@floridadep.gov</u> within **7 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,

Mary E. Gargan

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

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Citrus County Central Class I Landfill Facility ID No.: 39859 Warning Letter Page 2 of 2

Enclosure: Inspection Report

ec: Kelley Boatwright, DEP, <u>Kelley.M.Boatwright@floridadep.gov</u> Melissa Madden, DEP, <u>Melissa.Madden@floridadep.gov</u> Steven Tafuni, DEP, <u>Steven.Tafuni@floridadep.gov</u> Scott Borderieux, DEP, <u>Scott.Borderieux@floridadep.gov</u>



Florida Department of Environmental Protection Inspection Checklist

**FACILITY INFORMATION: Facility Name:** CITRUS CENTRAL SLF **On-site Inspection Start Date:** 10/03/2019 **On-site Inspection End Date:** 10/03/2019 WACS No.: 39859 Facility Street Address: 230 W GULF TO LAKE HWY **LECANTO** City: **County Name:** CITRUS Zip: 34461

#### **INSPECTION PARTICIPANTS:**

(Include ALL Landfill and Department Personnel with Corresponding Titles)
 Principal Inspector: Scott T Borderieux, Inspector
 Other Participants: Melissa Madden, Inspector; Matt Dinning, Inspector; Henry Norris, Solid Waste Division Director; Wendell Laigh, Waste Water Plant Operator;

#### **INSPECTION TYPE:**

Routine Operation Inspection for Landfill - Class I Routine Operation Inspection for WPF - Source-Separated Organics Proc Fac (SOPF) 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

10.0 - SECTION 10.0 - REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES

#### 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.

ltem No.	FILE REVIEW (Pre- or Post-Inspection, as appropriate.)	Yes	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			
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			
1.3	Is gas monitoring being performed as required by the permit? 62-701.500(9), 62-701.530(2)	1			
1.4	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)(c)		1		
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			
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		
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
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			
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			
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
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
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
1.13	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				1

#### 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))		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)		1		
2.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	1			
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)	1			
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)	1			
2.5	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	1			
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) 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) Biological waste - Disposal of dead animals due to disease 62-701.520(5)(a) Biological waste - Disposal of captive wildlife, fish or marine mammals, and domestic animals that have not died due to disease 62-701.520(5)(c)	7			
2.7	Are only permitted waste types disposed at facility? 62-701.340(2), 62-701.500(6)(a), 62-701.500(2)(c)	1			
2.6.5	Recommended guidance for Item 2.6 above. Facility was provided a copy of the Department's Disposal of Deceased Domestic Animals Guidance Document dated November 9, 2018. (Note: The Guidance Document is to provide direction regarding the disposal of deceased domestic animals pursuant to Chapter 62-701.520(5), F.A.C. and Chapter 823.041, F.S.)				

Item No.	LANDFILL OPERATION AND MAINTENANCE	Yes	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)	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)	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) Precipitation records 62-701.500(8)(g) Load-checking program records 62-701.500(6)(a) Training records 62-701.320(15)(a) Operation record 62-701.500(3)	J			
	Quantity of leachate 62-701.500(8)(f)				
2.11	Is the operation plan substantially followed? 62-701.500(2)	1			
2.12	Is incoming waste weighed? 62-701.500(4)(a) and 62-701.500(2)(d)	1			
2.13	Is the method and sequence of filling waste according to plans? 62-701.500(2)(f)	1			
2.14	Is access properly controlled to prevent unauthorized waste disposal? 62-701.500(5)	1			
2.15	Is waste compacted as required? 62-701.500(7)(a)	1			
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)	1			
2.17	Is a narrow working face practiced? 62-701.500(7)(d)	1			
2.18	Is the frequency, amount and quality of initial cover, as required? 62-701.500(7)(e)		1		
2.19	Is the frequency, amount and quality of intermediate cover, as required? 62-701.500(7)(f)		1		
2.20	Is litter controlled and are litter control devices maintained? 62-701.500(7)(i) and 62-701.500(11)(f)	1			
2.21	Is erosion control adequate? 62-701.500(7)(j)	1			
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)		1		
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)	1			
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)				1
2.25	Is gas controlled to not cause objectionable odors beyond the property boundary? 62-701.530(3)(b)	1			
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)		1		
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)	1			
2.32	Are communication facilities adequate? 62-701.500(11)(c)	1			
2.33	Are approved dust control methods adequate? 62-701.500(11)(d)	1			
2.34	Are fire protection and fire fighting capabilities adequate and operational? 62-	1		1	

Item No.	LANDFILL OPERATION AND MAINTENANCE	Yes	Not Ok	Unk	N/A
	701.500(11)(e)				
2.35	Are there required signs for operational directions and public information? 62- 701.500(11)(g)	1			
2.36	Are all-weather access roads and inside perimeter roads properly maintained? 62-701.500(12)	1			
2.37	Are groundwater wells intact and properly maintained? 62-701.510(2)(b), 62-701.620(8)		1		
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.	1			

#### 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))	Yes	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)	1			
9.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	1			
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?	1			
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)	1			
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)	1			
9.5	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	1			
Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Yes	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)	1			
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)	1			
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)	1			
9.9	Are fire protection services assured through notification to local fire protection authorities? 62-711.540(1)(d)	1			
9.10	Is an annual fire safety survey conducted? 62-711.540(1)(d)	1			
9.11	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)	1			
9.12	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e)	1			
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	1			
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)	1			
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)				1
9.16	Is adequate communications equipment available at the site? 62-711.540(1)(i)	1			
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)	1			

Item No.	WASTE TIRE FACILITY - STORAGE INDOORS	Yes	N O		Unk	N/A
9.18	Are waste tire piles more than 50 feet in width? 62-711.540(2)(a)					1
9.19	Are waste tire piles along a wall more than 25 feet in width? 62-711.540(2)(a)					1
9.20	Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b)					1
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)					1
9.22	Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(d)					1
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)					1
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)					1
9.25	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(2)(h)					1
ltem No.	WASTE TIRE FACILITY - STORAGE OUTDOORS		Yes	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)		1			
9.27	Does the waste tire pile have a width less than 50 feet? 62-711.540(3)(b)		1			
9.28	Does the waste tire pile have an area less than 10,000 sq. ft? 62-711.540(3)(b)		1			+
9.29	Does the waste tire pile have a height less than 15 feet? 62-711.540(3)(b)		1			+
9.30	Is there a 50 feet wide fire lane around the perimeter of the waste tire pile? 62-711.540(3	)(c)	1		1	1
9.31	Is there unobstructed access to the fire lane? 62-711.540(3)(c)		1			+
9.32	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d)		1			
9.33	Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62 711.540(3)(f)	-	1			
9.34	Is the site bermed or given other adequate protection to prevent liquid runoff from enterin water bodies? 62-711.540(3)(e)	g	1			
9.35	Are residuals contained on-site and disposed of in a permitted solid waste management facility or properly recycled? 62-711.540(5)		1			
9.36	Does the waste tire site qualify for the exceptions to the technical and operational standa as allowed by rule? 62-711.540(6)	rds	1			
ltem No.	WASTE TIRE FACILITY - COLLECTION CENTER		Yes	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)					1
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)					1

# 10.0 - SECTION 10.0 - REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING 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.

FACILITY TYPE(S)	MATERIAL(S) PROCESSED	PRODUCES	METHOD OF COMPOSTING
Vard Trash Transfer	✓ Yard Trash	✓ Mulch	Windrow
Station	Manure	Firewood	Passive aerated windrows
✓ Yard Trash Recycling	Animal byproducts	Fuel	Aerated static piles
	Pre-consumer vegetative	Compost	In-vessel composting
	waste	Soil Amendment	
	Vegetative waste	🗌 Soil	
		Other	

ltem No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ALL REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES	Yes	Not Ok	Unk	N/A
10.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted or registered solid waste management facility or other exempt facility? 62-701.300(1)(a)	1			
10.2	Have objectionable odors been caused or allowed in violation of Chapter 62-296, F.A.C.? 62-709.300(7)(a)	1			
10.3	Unauthorized storage or processing in a way or location that violates air quality or water quality standards? 62-709.300(7)(b), 62-701.300(1)(b)	1			
10.4	Do geological formations or subsurface features provide support for the facility? 62- 709.300(7)(b), 62-701.300(2)(a)	1			
10.5	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), 62-709.320(3)	1			
10.6	Unauthorized storage or processing in any natural or artificial water body (e.g. ground water and wetlands within DEP jurisdiction)? 62-709.300(7)(b), 62-701.300(2)(d)	1			
10.7	Unauthorized storage or processing on the right of way of any public highway, road, or alley? 62-709.300(7)(b), 62-701.300(2)(f)	1			
10.8	Unauthorized open burning of solid waste except in accordance with Department requirements? 62-709.300(7)(b), 62-701.300(3)	1			
10.9	Unauthorized incorporation of CCA treated wood into material that will be applied as a ground cover, soil or soil amendment? 62-709.300(7)(b), 62-701.300(14)	1			
10.10	Unauthorized unconfined emissions of particulate matter in violation of paragraph 62- 296.320(4)(c), F.A.C.? 62-709.300(7)(b), 62-701.300(15)	1			
10.11	Does the facility have the necessary operational features and equipment - unless otherwise specified? Including: 62-709.320(2)(a)				
10.11.1	Effective barrier to prevent unauthorized entry and dumping? 62-709.320(2)(a)1	1			
10.11.2	Dust and litter control methods? 62-709.320(2)(a)2	1			
10.12	Does the facility have the necessary fire protection and control provisions to deal with accidental burning of solid waste? Including 62-709.320(2)(a)3				
10.12.1	20-foot all-weather access road all around the perimeter? 62-709.320(2)(a)3.a.	1			
10.12.2	No material mechanically compacted? 62-709.320(2)(a)3.b.	1			

ltem No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ALL REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES	Yes	Not Ok	Unk	N/A
10.12.3	No material more than 50 feet from access by motorized firefighting equipment? 62-709.320(2)(a)3.c.	1			
10.13	Is the facility operated in a manner to control vectors? 62-709.320(2)(b)	1			
10.14	Is the facility operated in a manner to control objectionable odors per with Rule 62-296.320(2), F.A.C.? 62-709.320(2)(c)	1			
10.15	Are any installed drains and leachate or condensate conveyances kept cleaned? 62- 709.320(2)(d)				1
10.16	Is the received solid waste processed timely as follows? 62-709.320(2)(e)				
10.16.1	Is yard trash size-reduced or removed within 6 months or time needed to receive 3,000 tons or 12,000 cubic yards, whichever is greater? (Separated logs with 6 inch diameter or greater can be stored for up to 12 months before being size-reduced or removed.) 62-709.320(2)(e)1	1			
10.16.2	Is putrescible waste (e.g. vegetative wastes, animal byproducts or manure) processed and incorporated into the composting material, or removed from the facility, within 48 hours? 62-709.320(2)(e)2	1			
10.17	Is any treated or untreated biomedical waste; hazardous waste; or any materials having (PCB) concentration of 50 ppm or greater containerized and removed immediately? 62-709.320(2)(f), 62-701.300(4), 62-701.300(5), 62-701.300(6)	1			
10.18	Have all residuals, solid waste and recyclable materials been removed and recycled or disposed and has any remaining processed material been properly used or disposed upon the facility ceasing operations? 62-709.320(2)(g)				~
10.19	If temperature is used to show disinfection or vector attraction achieved, are records kept for at least three years? 62-709.320(4)(b)				1
10.20	Is the registration for the facility current and on file with the Department? 62-709.320(3)(b)	1			
10.21	Are renewal applications for annual registration of the facility submitted to the Department by July 1st, if applicable? 62-709.320(3)(c)	1			
10.22	Are monthly records of incoming and outgoing material kept on-site or at another location as indicated on the registration form for at least three years? 62-709.320(4)(a)	1			
10.23	Are Annual Reports, based upon the preceding calendar year, summarizing monthly records, submitted to the Department as required? 62-709.320(4)(a)	1			
ltem No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO YARD TRASH ONLY FACILITIES	Yes	Not Ok	Unk	N/A
10.24	Unauthorized storage or processing within 100 feet from off-site potable water well that existed before facility registered? 62-709.300(7)(b) and 62-701.300(12)(a)	1			
10.25	Unauthorized storage or processing within 50 feet from any body of water, including wetlands? (Does not include parts of permitted stormwater system, or water bodies totally within facility with no discharge to surface waters.) 62-709.300(7)(b), 62-701.300(12)(b)	1			
10.26	Is processed material removed from facility within 18 months, unless longer storage authorized by permit? 62-709.330(2)	1			
10.27	Is the facility accepting only yard trash, and bags used to collect yard trash and containerizing any other material? 62-709.330(3)	1			
ltem No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ONLY THOSE FACILITIES THAT BLEND MANURE OR COMPOST VEGETATIVE WASTES, ANIMAL BYPRODUCTS OR MANURE	Yes	Not Ok	Unk	N/A
10.28	Unauthorized storage or processing within 500 feet off-site potable water well that existed before facility registered? 62-709.300(7)(b) and 62-701.300(2)(b)				~
10.29	Unauthorized storage or processing within 200 feet from any body of water, including wetlands? (Does not include parts of permitted stormwater system, or water bodies totally within facility with no discharge to surface waters.) 62-709.300(7)(b), 62-701.300(2)(e)				~
10.30	Unauthorized storage or processing within 10,000 feet of any licensed and operating airport runway used by turbine powered aircraft, or within 5,000 feet of any licensed and operating airport runway used only by piston engine aircraft, unless applicant demonstrates that the facility is designed and will be operated so that it does not pose a bird hazard to aircraft? 62-709.300(7)(b), 62-701.320(13)(b)				~

ltem No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ONLY THOSE FACILITIES THAT BLEND MANURE OR COMPOST VEGETATIVE WASTES, ANIMAL BYPRODUCTS OR MANURE	Yes	Not Ok	Unk	N/A
10.31	Is the carbon:nitrogen ratio of the blended feedstocks greater than 20? 62-709.350(2)				1
10.32	Do piles exceed 12 feet in height? 62-709.350(3)				1
10.33	Is all material removed within 18 months, unless longer storage authorized by permit? 62-709.350(5)				1
10.34	Is there documentation showing that disinfection has been achieved? Note that this is not required if they are composting only pre-consumer vegetative waste with or without yard trash. 62-709.350(6)				1
10.35	Is there vector attraction reduction controls that include one of the following? 62-709.350(7) Temperature monitoring records showing the waste was composted for at least 14 days, with temperature no lower than 40 degrees Celsius and average temperature of the material being composted higher than 45 degrees Celsius. or 62-709.350(7)(a) Results of testing showing the specific oxygen uptake rate (SOUR) for material being composted or blended equal to or less than 1.5 milligrams of oxygen per hour per gram of total solids (dry weight basis) at a temperature of 20 degrees Celsius. 62- 709.350(7)(b)				1

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#### **Current 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 (VOCs) were detected above groundwater standards at MW-7 and MW-19 in the 2nd SA 2016 through 2nd SA 2019 Groundwater Monitoring Reports. The 1st SA 2016 Groundwater Monitoring Report attributed the VOCs exceedances at these wells to landfill gas.
Corrective Action:	On 2/22/2017, the Department, Citrus County, and Jones Edmunds had a meeting to discuss landfill gas migration and groundwater exceedances at the facility. The facility assessed the adequacy of the existing landfill gas and groundwater monitoring systems 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 provide an update on the implementation of the Landfill Gas Assessment and Groundwater Delineation plan. In addition, 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 has started the construction. 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 a minimum of 1 year. Based on a schedule provided on June 21, 2019, and updated September 9, 2019, it is anticipated that construction will be substantially completed by approximately December 2019. Please provide updates on the progress

of installation of the expanded system and notify the Department once completed.

Area:	Citizens Service Area
Rule:	62-701.300(1)(a)
Question Number:	2.1.1
Explanation:	Class I waste was observed in the furniture area of the citizen drop-off. Per Permit Condition C.5.b and Operation Plan Section K.2.c, Class I waste cannot be stored on the ground in this area.
Corrective Action:	Staff needs to be retrained/ reminded that Class I waste needs to be disposed of in the landfill or in the provided Class I dumpsters. In a email on October 18, 2019, Henry Norris stated that "Scale house employees and Spotters have been briefed on prohibited Class 1 waste deposited in the furniture area, customers are being instructed to place all household waste delivered to the customer service area in the provided dumpsters. Additionally we are planning to redirect customers with dump trailers to the working face if loads are determined to contain Class 1 waste. The gas system expansion contractor is currently installing lateral headers in phase III in the west end of phase III, once this phase of the project is complete a small working face will be created on the west end of phase III to take residential Class 1 waste."
	While the Department has no objections to this new working face, it will require an

update to Section K.2.C of the Facility's Operation Plan. Please provide the Department a timeline for when the Operation Plan will be updated and when this

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#### new procedure will begin within 30 days of receiving this inspection report.

#### Attachments:

Class I in Citizens Service Area



٥	
Area:	Phase III
Rule:	62-701.500(7)(e)
Question Number:	2.18
Explanation:	Please see comments for Item 2.19
Corrective Action:	Please see comments for Item 2.19
Area:	Phase III
Rule:	62-701.500(7)(f)
Question Number:	2.19
Explanation: Corrective Action:	The Department received a complaint on September 26, 2019 regarding cover used at the Facility. During the inspection, insufficient initial and intermediate cover, especially on the west end of Phase III, was observed. Exposed waste was apparent across the surface of Phase III. Permit Condition C.8 and Operation Plan Section K.2.g.2 require at least eighteen inches of cover (12 inches of intermediate cover in addition to the 6 inches of initial cover) to cover waste. Please cover this area per the requirements of the Permit and Operation Plan and send photographs of Phase III after it has been covered. In a follow-up email on October 18, 2019, Henry Norris stated that "Cover material will be utilized to minimize vector breeding, animal attraction and reduce fire potential as well as to prevent blowing litter and to control odors. Daily cover material will be composed of soil from the on-site borrow area and sufficient amounts will be hauled daily to cover working face. A 50/50 mixture of soil and mulch can be used to reduce soil consumption in addition to ADC which can be utilized and applied for a maximum duration of seven days in dry conditions. Daily soil cover will be placed and compacted minimum thickness of 6 inches; sprayed on ADC will be applied per manufacturer specification and shall not be used in rain. Intermediate cover shall be applied to a minimum thickness of 12 inches whenever an area is not intended for use for a period of longer than 180 days."
Attachments:	

#### Looking NW from top of Phase II

West end of Phase III



#### Phase III

2.28

#### 62-701.400(9)(b), 62-701.500(10)

Question Number:

Explanation:

Area:

Rule:

The Department received a complaint on September 26, 2019 regarding landfill leachate seeps mixing with the stormwater system. During the inspection, active leachate seeps were observed on the east end of Phase III, potentially discharging to the stormwater system. Also, their was no perimeter berm present around the working face.

Per Permit Condition C.16 and Operation Plan Section K.8, leachate shall not be discharged into the the stormwater management system. Stormwater or other surface water which comes into contact with or mixes with the solid waste or leachate shall be considered leachate and is subject to the requirements of Rule 62-701.500(8).

Corrective Action: Repair the seeps to prevent mixing of leachate with stormwater. On October 18, 2019, Henry Norris sent a follow-up email that stated "Seep repairs are ongoing on east and north side of phase III, expected completion 10/18. 200 loads of red clay soil is currently being procured to be used for any future seep repairs". Documentation received on October 24, 2019 confirmed that the seeps and berm had been repaired.

#### Attachments:

Active seep from Phase III

Active seep from Phase III (2)



## Seep Repaired on Phase III



### Working face berm



#### **Current Areas of Concern:**

62-701.530(2)(c)
1.4
2019 Quarter 1 and Quarter 2 gas monitoring reports were received on June 19 and October 8, 2019 respectively, after Department request. Please note that reports are due 15 days after each calendar quarter ends (i.e. April 15, July 15, October 15, and January 15).
Ensure that all reports are submitted to the Department on time. Quarterly reports are due 15 days after each calendar quarter ends (i.e. April 15, July 15, October 15, and January 15) per Rule 62-701.530(2)(c), Permit Condition 2.E.4, and Operation Plan Section K.9.e. Consent Order 05-1078 also requires reporting of gas sampling (Paragraph 7 and Exhibit B). Stipulations in the Consent Order allow for penalties of \$100 per day for failure to meet any requirement of the Consent Order. In the future, the Department may pursue penalties for any late submittals.
Phase III
62-701.500(2)(j), 62-701.500(8)(b), 62-701.500(8)(h)
2.22
The Department received a complaint on September 26 regarding leachate pump operations and reporting. It appears that the leachate pumps and transducers within the riser pipes of Phase 3 (and possibly Phase 2) may be located outside of

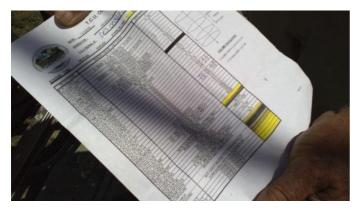
the sump (within the pipe & before the elbow) and/or that the pump setpoints may be set too high. During the inspection, the Phase 3 primary lead pump was set to pump at 7' and the lag at 7'2", with pump off at 6'5" and the secondary on at 1'5" and pump off 1'1". The primary alarm is set to 8'. It was also indicating that the transducer is set 1' above the pump in the riser pipe. The sump appears to be 4' deep. Please see the Phase 3 Expansion Project, Sheet 9, titled Leachate Collection System Details for more detail about the sump construction. Based on these observations, it appears that head on liner may be accumulating in excess of 12" within Phase 3 (and possibly Phase 2). Phase 3 may never be drawn down to less than 12" of head (normal operating condition between 2'7" and 3' of head on liner outside of the sump or more depending on transducer location). Similar setpoints were observed for Phase II but details for the sump construction have not yet been reviewed. This would be potentially in violation of Permit Condition C.12 and Operation Plan section K.8.a.

Corrective Action: Provide additional information about pump and transducer locations at Phases 1, 1A, 2 and 3 in relation to the pump setpoints and provide a demonstration that leachate is not allowed to accumulate in excess of 12" on each of the respective landfill liners.

In the 10-18-19 follow-up email, Henry Norris stated "The landfill is currently working with vendor to provide submersible camera services to determine transducer location within the risers and to determine the amount of head that is in each sump. Once this is completed a report will be submitted to FDEP for review." On October 24, 2019, Mr. Norris informed the Department that the vendor will be onsite on October 30, 2019 with cameras. Please submit the report to the Department within 14 days of project completion.

#### Attachments:

Set Points for Phase III



8	
Area:	Closed 60 Acre Landfill
Rule:	62-701.510(2)(b), 62-701.620(8)
Question Number:	2.37
Explanation:	Well pads for MW-19 and MW-19D were cracked. Appendix 3.IV of the Permit requires notification if a well becomes damaged or inoperable.
Corrective Action:	In an email dated October 18, 2019, Henry Norris stated "MW-19 and MW-19d were found to be damaged by contractor installing powered gas extraction system on the 7 acre site. Field services workers from Jones Edmunds have inspected the wells and found that the integrity of the wells have not been compromised and informed the contractor of the required repairs to concrete pads. Will follow up with FDEP when concrete work is complete." Please provide an expected timeline for these repairs and report submittal. Not every well was inspected during the inspection by the Department. The Department recommends that

Citrus County verify that each well is intact, locked, labelled, and properly maintained.

#### Attachments:

MW-19 with cracked pad

MW-19D with cracked pad



#### COMMENTS:

Item 1.6: Groundwater monitoring data was reviewed for groundwater standard exceedances, completeness, and quality assurance/quality control (QA/QC); however, a review of historical data trending was not performed

Items 1.8 and 1.9: Financial assurance cost estimate adjustments were received on August 21, 2019 and approved on September 13, 2019. Financial assurance was verified and approved by Tallahassee.

Items 2.18, 2.19, 2.22, and 2.28 refer to a complaint received on September 26, 2019. This document can be located in the Department Public Access Oculus database at: https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=8.303829.1]&[profile=

Discovery\_Compliance]

Item 2.38: During the inspection, the 7 Acre cell and Phases I and IA side slopes appeared to need mowing. Citrus County confirmed mowing of these areas was completed on October 14, 2019.

Item 9.10: The annual fire inspection was performed on April 29, 2019 by Citrus County Fire Rescue. The report was received by the Department on June 19, 2019.

Item 9.17: If tires are stored outdoors for greater than 30 days, the Department recommends spraying to control mosquitoes.

Items 10.20 and 10.21: SOPF Registration Renewal and Payment were received on June 20, 2019.

Citrus County Landfill has partnered with T2C-Energy on a pilot program using landfill gas taken from the condensate knockout pot. This pilot program is not expected to allow release of landfill gas to the atmosphere. Please ensure that future projects are authorized by the Department's Solid Waste Section prior to initiating work.

#### ATTACHMENTS:

Inspection Date: 10/03/2019

## Working Face (with berm)

Working face viewed from Phase II



Working face (10-14-19)



Future new flare site

Mowed Closed Area



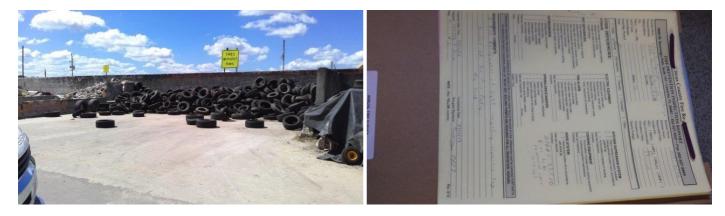
SOPF Area



Waste Tire Section



Waste Tire Fire Inspection



Inspection Date: 10/03/2019

#### Signed:

Scott T Borderieux	Inspector		
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TIT	LE	
Scoto Bord	DEP	10/24/2019	
PRINCIPAL INSPECTOR SIGNATURE	ORGANIZATION	DATE	
Melissa Madden	Inspector		
INSPECTOR NAME	INSPECTOR TITLE		
NO SIGNATURE REQUIRED	DEP		
INSPECTOR SIGNATURE	ORGANIZATION		
Matt Dinning	Inspector		
INSPECTOR NAME	INSPECTOR TITLE		
NO SIGNATURE REQUIRED	DEP		
INSPECTOR SIGNATURE	ORGANIZATION		
Henry Norris	Solid Waste Division Director		
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.

Wendell Laigh	Waste Water Plant Operator	
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: 10/30/2019