



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

December 13, 2019

Kirk Wills, Southern Region Engineer
Waste Connections
1501 Omni Way
St. Cloud, FL 34773
Kirk.Wills@wasteconnections.com

Re: Compliance Assistance Offer
JED Solid Waste Management Facility
SW #89544
Osceola County

Dear Mr. Wills:

An inspection was conducted at your property on November 26, 2019, under the authority of Section 403.091, Florida Statutes (F.S.). During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

Specifically, potential non-compliance with the requirements of Chapter 403, F.S. and Chapter 62-701, Florida Administrative Code were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the item(s) of concern noted and respond in writing within **30 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed. See page 6 of inspection report for corrective action.
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the item of concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

JED Landfill; Facility ID No.: 89544
Compliance Assistance Offer
Page 2 of 2
December 13, 2019

Please address your response and any questions to Amada Fernandez of the Central District Office at 407-897-4159 or via e-mail at Amada.M.Fernandez@FloridaDEP.gov. We look forward to your cooperation with this matter.

Sincerely,



Jill Farris,
Central District
Florida Department of Environmental Protection

Enclosures: Inspection Report (with attachments)

cc: Amada Fernandez and Jill Farris, FDEP
Benjamin Gray, Benjamin.Gray@wasteconnections.com



**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: J.E.D LANDFILL (F/K/A OAK HAMMOCK DISPOSAL)

On-site Inspection Start Date: 11/26/2019

On-site Inspection End Date: 11/26/2019

WACS No.: 89544

Facility Street Address: 1501 OMNI WAY

City: SAINT CLOUD

County Name: OSCEOLA

Zip: 34773

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Amada M Fernandez, Inspector

Other Participants: Benjamin Gray, District 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

J.E.D LANDFILL (F/K/A OAK HAMMOCK DISPOSAL)

Inspection Date: 11/26/2019

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.)	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	✓			
1.2	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: 11/26/2019

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))	Yes	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) <input type="checkbox"/> Biological waste - Disposal of dead animals due to disease 62-701.520(5)(a) <input type="checkbox"/> Biological waste - Disposal of dead poultry and hatchery residue 62-701.520(5)(b) <input type="checkbox"/> 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)	✓			
2.7	Are only permitted waste types disposed at facility? 62-701.340(2), 62-701.500(6)(a), 62-701.500(2)(c)	✓			
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.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				

Inspection Date: 11/26/2019

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)	✓			
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) <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)	✓			
2.34	Are fire protection and fire fighting capabilities adequate and operational? 62-	✓			

Inspection Date: 11/26/2019

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)	✓			
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.	✓			

J.E.D LANDFILL (F/K/A OAK HAMMOCK DISPOSAL)

Inspection Date: 11/26/2019

Current Violations:

Rule: 62-701.400(9)(b), 62-701.500(10)

Question Number: 2.28

Explanation: Leachate seepage was observed along the eastern slopes of Cells 3 and 6 and along the northeastern slopes of Cells 9, 10 and 11, with the potential for runoff into the stormwater pond. The facility had already begun taking corrective action to remediate the leachate seeps and to prevent further seepage. The intermediate cover was being reworked at the time of the inspection. Mr. Gray stated the facility will begin laying a 40-mil liner as a temporary cap to prevent future leachate seeps starting the week of December 2, 2019.

Corrective Action: The facility shall submit a corrective action plan to the Department describing the leachate seepage problem and shall include a description and timeline of corrective actions. In an email dated December 11, 2019 Mr. Gray stated the facility is currently working on the corrective action plan.

COMMENTS:

Current landfill operations are outlined in permit 0199726-033-SO-01, issued 6/13/17 and expires 6/13/27. This permit authorizes operation of Phases I through 5, which includes Cells 1 through 15. Modifications to the permit are outlined in permit 0199726-037-SO-MM and include an update to the operation plan. Changes to the operation plan include the addition of Posi-Shell spray-on product as an alternate initial cover material and update to the leachate treatment facility. Construction permit 0199726-031-SC-01 authorizes the construction of Phase 4, Cell 12 and Phase 5, Cells 14 and 15 over a 10-year period, issued 9/7/16 and expires 9/7/26. Construction of Cell 12 was completed last year. Mr. Gray stated that further construction is not likely for another year.

Item 1.2 - The 2019 annual estimate of remaining life was received 4/5/19. The 2018 annual waste report was received 1/21/19.

Items 1.3 and 1.4 - The 1st quarter 2019 gas report was received 4/10/19. The 2nd quarter 2019 gas report was received 7/15/19.

Item 1.5 - The 30th Semi-annual Water Quality Monitoring Report was received 8/6/19. The 7th 2.5-year Technical Report on Water Quality was received 9/30/19.

Item 1.6 marked unknown - The water quality report is reviewed as a separate function and is not deemed part of this inspection report.

Item 1.8 - Financial assurance is adequate per a letter from the Department's Financial Coordinator dated 6/03/2019.

Item 1.9 - The 2019 closure cost estimate was received 5/30/19.

Waste tires:

The facility accepts waste tires for collection and sends the tires out to Empire Tire for processing when the pile reaches the permitted capacity. The tires are then sent back to the landfill for disposal or for use as alternate cover. The facility is current on quarterly records required by the WTPF permit. The WTPF is in compliance.

Waste is currently being placed in the third lift of Cell 12. The facility performs load checks once a day. The facility is using alternate cover materials including 50/50 mulch/soil blend, tarps, processed tires and contaminated soils. The facility is currently not using Posi-Shell or other spray-on products as alternate cover material.

The operators and spotters on-site were Jose Sanchez, Porfirio Casteneda-Calvillo, Jesus Urbina, Karen Smith and Matt Belden. Training records are up to date.

The facility no longer accepts Puerto Rican Coal Combustion Residuals (CCR) for disposal.

The facility has recirculated leachate this year in accordance with the operation permit. Leachate recirculation is recorded in the leachate records. The leachate generated on-site is pumped to one of

J.E.D LANDFILL (F/K/A OAK HAMMOCK DISPOSAL)

Inspection Date: 11/26/2019

three leachate storage ponds. Leachate is currently being disposed of at the Aqua Clean Environmental Company rather than at the City of St. Cloud's waste water treatment plant, in accordance with the most recent permit modification. A temporary leachate evaporator system was on-site next to the leachate ponds but was not hooked up. Mr. Gray stated a permanent leachate evaporator system is expected to arrive within a month. Air Construction Permit No. 0970079-014-AC authorizes the installation of the leachate evaporator system consisting of two evaporator tanks with a combined capacity of 52,000 gallons per day, and a volatile organic compounds (VOC) and ammonia stripper column.

Leachate seepage was observed along the eastern slopes of Cells 3 and 6 and along the northeastern slopes of Cells 9, 10 and 11. Mr. Gray stated a black 40-mil liner will be used as a temporary cap to prevent future leachate seeps. He stated the facility will begin laying the liner the week of December 2, 2019. He stated the project should take several months. In accordance with the facility's Operation Plan for Leachate Recirculation and with Rule 62-701.400(5)(d), leachate circulation activities in areas of a seepage will cease until the extent of the problem and possible corrective measures have been evaluated.

ATTACHMENTS:

Leachate seep Cell 11



Leachate seep Cell 11



Leachate seep Cells 3,6,9,10



Inspection Date: 11/26/2019

Signed:

Amada M Fernandez

Inspector

PRINCIPAL INSPECTOR NAME**PRINCIPAL INSPECTOR TITLE**

DEP

12/12/2019

PRINCIPAL INSPECTOR SIGNATURE**ORGANIZATION****DATE**

Benjamin Gray

District Manager

REPRESENTATIVE NAME**REPRESENTATIVE TITLE**

NO SIGNATURE REQUIRED

Waste Connections

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:** Jill M. Farris**Inspection Approval Date:** 12/12/2019