



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

December 28, 2020

Commissioner Scott E. Carnahan, Chair
Citrus County Board of County Commissioners
c/o Henry C. Norris
3600 Sovereign Path, Suite 212
Lecanto, FL 34460
Henry.Norris@citrusbocc.com

Re: Warning Letter #WL20-207SW09SWD
OGC File No. 05-1078
Citrus County Class I Central Landfill
Facility ID: 39859
Citrus County

Dear Commissioner Carnahan:

A compliance inspection was conducted at the above referenced facility on December 4, 2020. 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 to review the inspection findings, which include both new and pre-existing items.

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 Steven Tafuni at 813-470-5792 or at Steven.Tafuni@floridadep.gov within **15 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,

A handwritten signature in blue ink that reads "Mary E. Yeargan".

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

www.FloridaDEP.gov

Citrus County Central Class I Landfill
Facility ID No.: 39859
WL20-207SW09SWD
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Enclosure: Inspection Report

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**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: CITRUS CENTRAL SLF
On-site Inspection Start Date: 12/04/2020
On-site Inspection End Date: 12/04/2020
WACS No.: 39859
Facility Street Address: 230 W GULF TO LAKE HWY
City: LECANTO
County Name: CITRUS
Zip: 34461

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Alexis R Black, Inspector

Other Participants: Melissa Madden, Senior Program Analyst; Henry C. Norris, Jr., Solid Waste Division Director; Joshua Younce, 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: 12/04/2020

1.0 - SECTION 1.0 - FILE REVIEW**Requirements:**

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

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

CITRUS CENTRAL SLF

Inspection Date: 12/04/2020

2.0 - SECTION 2.0 - LANDFILL OPERATION AND MAINTENANCE

Requirements:

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

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

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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) <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-	✓			

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Item No.	LANDFILL OPERATION AND MAINTENANCE	Ok	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.		✓		

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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.

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

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

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Current Violations:

Rule: 62-701.500(2)

Question Number: 2.11

Explanation: Two working faces were observed in Phase III of the facility. One phase was dedicated to residential customers and the other to commercial customers. The operation of two working faces is not currently authorized by the Permit No. 21375-025-SO-01 and is not depicted in the facility's operation plan.

Corrective Action: As previously identified in the 2019 inspection report, a modification to the facility's operation plan is required in order to operate the landfill in this manner. Within 30 calendar days of the date listed on the attached letter, please provide the Department with information concerning when a modification to update the operation plan will be completed.

Attachments:

Two Working Faces



Rule: 62-701.500(11)(f), 62-701.500(7)(i)

Question Number: 2.20

Explanation: During the inspection, litter was observed at the facility outside of the area immediately adjacent to the workface, including the stormwater swales, covered waste areas, the anchor trench tie-in berm, and areas beyond the fence on the east side of the landfill. Facility personnel were spotting litter on the west side of Phase II and III during the inspection. Photo documentation was provided to the Department via email on December 11, 2020, showing that litter was removed from the areas beyond the fence on the east side of the landfill and the access road adjacent to that fence. In addition, per this same email correspondence, litter fences are to be installed at the facility.

Corrective Action: Within 30 calendar days of the date listed on the attached letter, please provide the Department with photo documentation demonstrating that all stormwater swales, covered waste areas, and the anchor trench tie-in berm are free of litter. Please also provide documentation showing the installation of litter fences at the facility.

Attachments:

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West Side of Phase II/III



West Side of Phase II/III



Western Stormwater Swale



Area Adjacent to Stormwater Swale



Anchor Trench Tie-In Berm



Litter Beyond Fence



12/11/20: No Litter Beyond Fence



12/11/20: No Litter Beyond Fence



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Rule: 62-701.500(7)(j)

Question Number: 2.21

Explanation: Erosion was observed within the stormwater swale on the western side of the landfill during the inspection. The stormwater liner was exposed as a result of this erosion. Waste was also observed above and below the area of erosion.

Corrective Action: Within 30 calendar days of the date listed on the attached letter, please provide the Department with documentation demonstrating that the soil and waste that washed down into the stormwater swale was removed. In addition, please provide documentation demonstrating that the area at and near where the erosion occurred is stabilized so as to prevent additional erosion from occurring in the future.

Attachments:

Erosion & Washdown in Swale



Rule: 62-701.500(10)

Question Number: 2.29

Explanation: See Items 2.20, 2.21, and 2.22.

Corrective Action: See Items 2.20, 2.21, and 2.22.

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: A) Volatile Organic Compounds (VOCs) were detected above groundwater standards at monitoring wells (MW) 7 and 19 in the groundwater monitoring reports for events submitted between the second semiannual 2016 and second semiannual 2020 reports. The first semiannual 2016 groundwater monitoring report attributed the VOCs exceedances at these wells to landfill gas. Arsenic was also detected above groundwater standards at MW-7 and MW-20. The Arsenic exceedances in MW-20 were first reported with the first semiannual 2020 groundwater monitoring report, but the Arsenic exceedance in MW-7 was just reported with the second semiannual 2020 groundwater monitoring report.

Per the data presented in the latest groundwater technical report (covers groundwater monitoring data presented with reports submitted between the first semiannual 2018 and the first semiannual 2020), it appears that increasing concentrations of certain parameters at the following wells could indicate a leachate discharge although the concentrations of Chloride and Sodium are below applicable drinking water standards. Please see Item 2.28 for additional

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information regarding this violation.

- i) Conductivity, Chloride, and Total Dissolved Solids at MW-17, MW-19, and MW-20.
- ii) Total Dissolved Solids at MW-11, MW-12, MW-14, and MW-22.
- iii) Sodium at MW-12, MW-14, MW-15.

B) Discussion between the Department and facility personnel regarding MW-19's screen being submerged by groundwater occurred during the inspection. Because landfill gas does not typically migrate through water, the Department has concerns that there may be some type of conduit within the well that is permitting landfill gas to permeate into the well casing. Department personnel indicated that the facility could utilize a small submersible camera to investigate the well to determine what could be contributing to the presence of landfill gas within this well.

Corrective Action: A) Per the second semiannual 2020 groundwater monitoring report, the new landfill gas system has been in operation full-time since June 2020. Per the monitoring data provided with this report, the concentration of Benzene within MW-7 remains an exceedance (6.4 ug/L) while other VOCs concentrations were detected below drinking water standards. The VOCs in MW-19 remain exceedances (Vinyl Chloride - 3.8 ug/L; Benzene 2.2 ug/L). It may be too soon to know the degree of effectiveness of this new landfill gas system until it has been in operation for at least one year. The blower system is also indicated to be working, but possibly not at the level desired. To maximize the efficiency of the landfill gas extraction system, increasing the frequency in which the gas wells are tuned, which is currently twice per year, should be completed to sufficiently capture the seasonal variations of gas production at this facility. Lastly, this semiannual report indicates that the plume of VOC exceedances in the area North of the Closed Landfill Cells has been delineated. A review of the data presented regarding this matter is still undergoing review by the Department. Continued monitoring of these VOCs and the Arsenic exceedances is warranted for future groundwater monitoring events.

B) Please provide the Department with information regarding any efforts taken to investigate MW-19 within 30 calendar days of the date listed on the attached letter.

Comments:

Per the October 2019 Inspection:

On February 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 June 6, 2017 and received June 9, 2017) to retrofit/expand both systems to determine the extent and path of landfill gas migration and impacts to groundwater.

The Department also 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 status of existing Consent Order 05-1078. The County received a permit modification to expand the landfill gas system on July 10, 2018 and has started the construction (as of October 2019). The County is also continuing to monitor the site as outlined in the report discussed previously. The Department anticipates an evaluation of the effectiveness of the expanded landfill gas 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 one 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.

CITRUS CENTRAL SLF

Inspection Date: 12/04/2020

Area: Phase III

Rule: 62-701.500(7)(e)

Question Number: 2.18

Explanation: This is the second consecutive violation for this item observed during inspection. The initial cover located in the central areas of Phase III was not adequate during the inspection. Facility staff indicated that some of the issues could be attributed to a break down of the compactor in the days prior to the inspection. Photo documentation was submitted to the Department electronically on December 18, 2020, demonstrating that the facility has begun to deposit initial cover on previously identified areas. However, following the inspection, the facility's dozer experienced a mechanical malfunction and is currently being repaired offsite. The facility is currently working to receive a rented dozer to complete the placement of initial cover in these areas.

Corrective Action: Within 30 calendar days of the date listed on the attached letter, please provide the Department with documentation indicating one of the following:
 A) The the dozer was repaired and is currently functional at the facility, or;
 B) A rented dozer was obtained and is in use at the facility.

In addition, please provide documentation within this same timeframe demonstrating the placement of initial cover on the central areas of Phase II and/or III is completed.

Attachments:

Central Areas - Inadequate Cover

12/18/20: Work in Central Areas



12/18/20: Work in Central Areas



Area: Phase I Landfill

Rule: 62-701.500(7)(f)

Inspection Date: 12/04/2020

Question Number: 2.19

Explanation: This is the second consecutive violation for this item observed during inspection. The intermediate cover located on the southeastern corner of Phase I was not adequate during the inspection. The facility provided the Department with photo documentation via email on December 18, 2020, that the southeastern corner of Phase I received adequate intermediate cover. In addition, a bare spot was observed on the top of Phase I near the northern side slope that leads down to Phase II.

Corrective Action: Within 30 calendar days of the date listed on the attached letter, please provide the Department with photo documentation demonstrating that the bare spot described above was filled in with soil.

Attachments:

SE Corner, Phase I

12/18/20: SE Corner w/ Cover



12/18/20: SE Corner w/ Cover



Bare Spot on Phase I



Area: Phase III

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

Question Number: 2.28

Explanation: In Regards to the 2020 Inspection:
This is the second consecutive violation for this item observed during inspection.

A) Five leachate seeps in total were observed at the eastern, northern, and western sides of the landfill. The western leachate seep was observed in Phase II and potentially discharged into the stormwater system. The northern leachate seeps (two seeps) were discharging outside of the edge of disposal and into the perimeter stormwater swale. The eastern leachate seeps (two seeps) were also

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discharging outside of the edge of disposal and possibly into the stormwater management system. Per email correspondence dated December 11, 2020, the facility indicated that the recent installation of lateral gas wells may have created a conduit for water to infiltrate the landfill and to consequently cause these leachate seeps. Photo documentation was provided with this correspondence showing that the eastern and northern leachate seeps were repaired by placing cover on them.

B) The berm around the working face was comprised of waste filled soil during the inspection. Photo documentation was provided via email on December 11, 2020, showing that a new berm comprised of clean soil was installed around the working face.

Corrective Action:

A) The December 11 correspondence does not appear to contain photo documentation demonstrating that the seep located on the western side of the landfill is repaired. Please provide this documentation within 30 calendar days of the date listed on the attached letter. In addition, please continue to inspect the facility daily for leachate seeps to ensure that no discharges outside of the edge of disposal and discharges into the stormwater system occur. If this does occur, please notify the Department within 24 hours of occurrence. If seepage continues, the County may need to explore greater mitigation efforts, e.g. a constructed toe drain or some other tie-in to the leachate system to ensure leachate is not allowed to discharge beyond the liner system.

B) No additional corrective actions are required at this time. Please continue to ensure that a berm comprised of clean soil surrounds the working face during operation.

Attachments:

West Leachate Seep



North Leachate Seep (1)



Leachate w/in Perimeter Swale



Puddle from Leachate Seep



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North Leachate Seep (2)



East Leachate Seep (1)



East Leachate Seep (2)



East Seeps Repair



North Seeps Repair



Waste Filled Berm



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Berm of Clean Soil



Current Areas of Concern:

Rule: 62-701.500(2)(f)

Question Number: 2.13

Explanation: A review of the 2019 topographic survey submitted to the Department with the latest annual estimate of remaining life report indicated that the elevation on the top of Phase I was 166 feet NAVD88 in September 2019, and the elevations of Phase II and III ranged between 120 and 140 feet NAVD88, respectively. At the time of the inspection, it appeared that the facility may not be filling the landfill in accordance with the fill sequence drawings included in the operation plan. Facility personnel indicated that Phase III was currently estimated to be around elevation 150 feet. As detailed in the fill sequence drawings, Step 4 should not have exceeded elevation 134 in Phases II/III and are brought up to elevations between 148.5 and 154.9 in fill sequence Step 5. However, during the inspection, it did not appear that waste between the elevations of 166 and 180 feet were observed in Phase I, which is also part of fill sequence Step 4. Discussion between the Department and facility personnel following the inspection indicated that a topographic survey of the facility was recently completed in September.

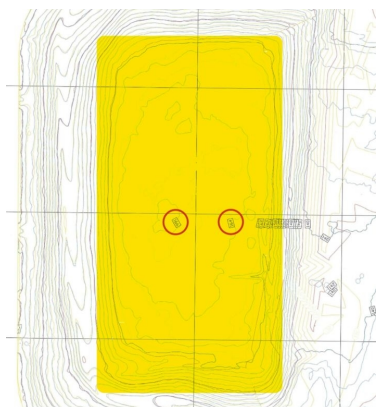
Corrective Action: Within 30 calendar days of the date listed on the attached letter, please provide the Department with a copy of the latest topographic survey of the landfill. In addition, please provide the following information to the Department:

- A) Photo documentation indicating that waste filling on the top of Phase I to elevation 180 feet has commenced and information detailing the approximate completion date of waste filling in this area, or;
- B) Documentation indicating if the facility would like to seek a permit modification to change the method and sequence of fill drawings and applicable sections included in the operation plan, and information detailing the facility's timeline to seek this permit modification.

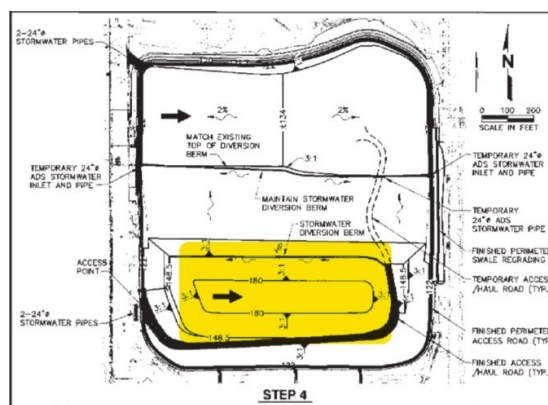
Attachments:

Inspection Date: 12/04/2020

Sept. '19 Topo. 160+ Elev. Ph. I



Step 4 of Fill Sequence



Rule: 62-701.530(3)(b)

Question Number: 2.25

Explanation: Although odors were not observed beyond the landfill property boundary, the gas-like odors detected onsite were strong at the time of the inspection. Adjacent to the Phase III riser pipes, the gas odor was found to be incredibly strong. Upon inspection of the area adjacent to these pipes, Department staff observed a bare area and exposed geonet. It is believed that this area could be conduit for gas to escape the landfill. On December 11, 2020, the facility provided photo documentation via email showing that this bare area and geonet was covered with soil.

Corrective Action: Please inspect the perimeter of Phase III for any excessive odors, bare spots, and/or exposed geonet. If observed, please cover the areas with soil. This activity should be incorporated into routine facility inspections to minimize gas emissions and odors.

Attachments:

Bare Area & Exposed Geonet



12/11/20: Soil Over Area



Rule: 62-701.500(11)(a)

Question Number: 2.30

Explanation: See Item 2.31.

Corrective Action: See Item 2.31.

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Rule: 62-701.500(11)(b)

Question Number: 2.31

Explanation: At the time of the inspection, the facility's compactor was not functional due to a mechanical issue. The facility utilized the dozer to compact waste instead until the compactor was functional again. Per email correspondence dated December 18, 2020, from the facility, the compactor is now functional and in use. However, the dozer suffered a malfunction is now being repaired offsite at a repair shop. A rental dozer is being contracted for at this time. Please note that the facility's operation plan details in section K.11.b that the County has arrangements with suppliers to obtain reserve equipment within 24 hours of equipment breakdown if sufficient equipment is not available to properly operate the landfill.

Corrective Action: Within 30 calendar days of the date listed on the attached letter, please provide the Department with documentation indicating that either the dozer was repaired and is functional or that a replacement dozer is being utilized.

Rule: 403.161, 62-701.320(1)

Question Number: 2.38

Explanation: The new blower system connected to the new landfill gas extraction system does not appear to be included in the air permit application that is currently in-house for processing at the Department.

Corrective Action: Please communicate with the Department's Air Permitting Program to ensure that this new blower system does not need to be incorporated into the facility's air permit within 30 calendar days of the date listed on the attached letter.

Attachments:

Blower System



Rule: 62-711.540(1)(d)

Question Number: 9.10

Explanation: The last annual fire safety survey was conducted in April 2019 and provided in April 2020.

Corrective Action: Please provide the 2020 fire safety survey within 30 calendar days of the date listed on the attached letter.

Pre-existing Areas of Concern:

Area: Phase III

Rule: 62-701.500(2)(j), 62-701.500(8)(b), 62-701.500(8)(h)

Inspection Date: 12/04/2020

Question Number: 2.22

Explanation: In Regards to the 2020 Inspection:
The facility is currently working with Jones Edmunds to complete a Leachate System evaluation that assess the system's hydraulics, its pump check valves, and its power and controls. An initial evaluation was completed (dated September 9, 2020) detailing what actions must be taken to address any inadequacies noted for the three categories of items described previously. A Leachate Collection System Cleaning and Video Inspection Memorandum by Jones Edmunds (dated August 19, 2020, received August 20, 2020) was also completed to supplement the ongoing system evaluation. Per discussion with the facility during the inspection, a full-time employee dedicated to the operation and maintenance of the leachate system is anticipated to be hired soon.

A) In May 2020, the primary pump within Phase II malfunctioned and became inoperable. On June 8, 2020, the primary pump and transducer were replaced. But on June 9, 2020, the second primary and the secondary pumps also malfunctioned and became inoperable. Per email correspondence with the facility at that time (dated June 26, 2020), a short period of time passed during which Phase II did not have an operational pump installed. Temporary pump installations within the primary (one 5-horsepower pump) and secondary (one 1-horsepower pump) riser pipes of Phase II were completed on July 8, 2020. New check valves were installed on three pumps in Phase II on July 24, 2020 per email correspondence dated August 6, 2020. New and preferable pumps are currently in the process of being ordered by the County per the Jones Edmunds initial system evaluation.

B) In conjunction with the issues experienced with these pumps, the facility indicated in email correspondence (dated July 23, 2020) that the control panel that controls the Phase II and Phase III telemetry will be replaced as the control panel is seen as a possible contributor to the pump malfunctions experienced in Phase II. During the inspection, facility personnel indicated that the Phase II control panel will be replaced and that the SCADA system is being upgraded as well.

C) Per the Leachate Collection System Cleaning and Video Inspection Memorandum, four areas of pipe in which possible issues were encountered were observed. Two areas of pipe in which the camera stopped for unknown reasons are located in Phases II and III. The third area of pipe is also in Phase III. Within this area, sand is visible and caused the camera to stop. The fourth area of pipe is located in Phase IA and it was observed that the pipe is partially crushed, therefore causing the camera to stop. During the inspection, Department staff observed limestone within the onsite borrow pit. Based on the images provided by the leachate cleaning and inspection report, it is possible that calcification could be occurring within this area of the leachate system. In addition, Jones Edmunds indicates in this memorandum that the Phase IA pipe has become more constricted since 2015, and that more sand has accumulated in Phases II and III since 2015. The Jones Edmunds Cleaning and Inspection Memorandum indicates that additional investigation of these two areas is warranted.

D) At the time of the inspection, exterior portions of the flare condensate flange and the piping above the leachate lift station were corroded. The air relief valve at the main lift station discharged a heavy stream of leachate into the air during the inspection. Email correspondence dated December 11 and 18, 2020 from the facility shows that the flare condensate flange was replaced.

E) Per review of the latest quarterly leachate generation reports, the data reported includes data including, but not limited to, secondary values greater than those of

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the primary, zero values, and negative values.

Corrective Action: Within 30 calendar days of the date listed on the attached letter, please provide the Department with information concerning the following items. Additionally, please provide an update regarding the continued efforts to complete the leachate system evaluation, including a determination regarding appropriate transducer elevations to ensure no greater than 12" head on liner occurs, as identified during the 2019 inspection.

A) Please provide information concerning the timeframe for the installation of new, preferable pumps within Phase II.

B) Please provide information detailing what control panels will be replaced and what the timeframe to complete their installation will be. Please also provide information stating when the SCADA update will be completed.

C) Please provide documentation demonstrating if calcification could be occurring within the third area of pipe described above. Please also continue to evaluate the pipe construction in Phase IA and the sand accumulation in Phases II and III.

D) Please provide photo documentation demonstrating that the corroded pipes at the lift station were replaced and that the air relief valve is replaced to prevent significant leachate discharge.

E) Please ensure that the next quarterly leachate generation report (due January 15, 2021) and every report thereafter addresses any issues like those noted above in the narrative of the report so as to aid with understanding the impacts of the leachate system's functionality on the leachate generation data reported.

Comments:

Per the October 2019 Inspection:

The Department received a complaint on September 26, 2019, regarding leachate pump operations and reporting. It appears that the leachate pumps and transducers within the riser pipes of Phase III (and possibly Phase II) 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 III primary lead pump was set to pump at 7' and the lag at 7'2" with the pump off at 6'5", and the secondary on at 1'5" and off at 1'1". The primary alarm is set to 8'. It was indicated that the transducer is set 1' above the pump in the riser pipe. The sump appears to be 4' deep. Please see the Phase III Expansion Project, Sheet 9, titled Leachate Collection System Details for more detail about the sump construction. Based on these inspection observations, it appears that head on liner may be accumulating in excess of 12" within Phase III (and possibly Phase II). Phase III may never be drawn down to less than 12" of head (normal operating condition is between 2'7" and 3' or more of head on the liner outside of the sump depending on transducer location). Similar setpoints for the primary and secondary were observed for Phase II, but details for the sump construction needed to be reviewed following the inspection.

Attachments:

C) Summary of Four Pipe Areas

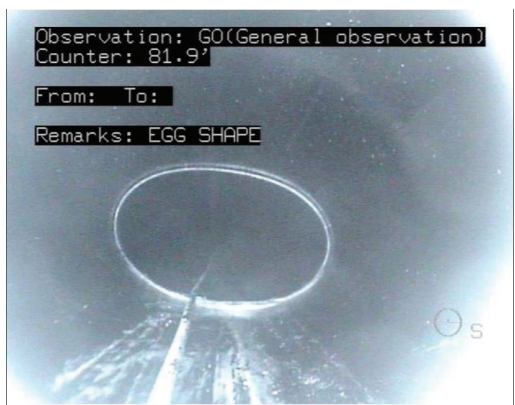
VIDEO LOCATION	ACHIEVED DISTANCE (ft)	COMMENTS
Setup 1 - Phase 3 - WCO to ECO	186.8'	Camera stops under leachate with no clear video picture. Reason for stoppage can not be determined. Smaller jet nozzle proceeded 1,000'.
Setup 2 - Phase 2 - WCO to ECO	732.8'	Camera stops under leachate with no clear video picture. Reason for stoppage can not be determined. Smaller jet nozzle proceeded 1,000'.
Setup 3 - Phase 3 - ECO to WCO	362.6'	Sand visible in pipe stopping camera's forward progress. Smaller jet nozzle proceeded 1,000'.
Setup 6 - Phase 1A - WCO to ECO	108.0'	Pipe partially crushed stopping camera's forward progress. Smaller jet nozzle stopped at same location.

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C) Phase III - Sand Observed



C) Phase IA Constricted Pipe



C) Phase IA Constricted Pipe



D) Corroded Lift Station Pipes



D) Corroded CS-2 Flange



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D) Replaced CS-2 Flange



Area: Closed 60 Acre Landfill

Rule: 62-701.510(2)(b), 62-701.620(8)

Question Number: 2.37

Explanation: MW-21 was covered in vegetation and could not be visually inspected at the time of the inspection.

Corrective Action: Please provide photo documentation showing this well clear of vegetation and the well's overall condition within 30 calendar days of the date listed on the attached letter.

Attachments:

Monitoring Well 21



COMMENTS:

Item 1.5: The stabilization criteria for MW-10 and MW-18 was not met during the second semiannual 2020 sampling event. MW-10 did not meet the stabilization criteria for turbidity. Although it has been noted that MW-10 historically has high turbidity during sampling events, it is required that measures be taken to ensure turbidity levels meet the stabilization criteria so as to ensure that the data reported in these reports is usable. Also, only two samples were reported on the field sampling log for MW-18. Please ensure that three consecutive samples are taken for each monitoring well for each sampling event.

Item 2.6.5: The Department's Disposal of Deceased Domestic Animals Guidance Document was provided to the facility electronically on December 21, 2020.

Item 2.24: Leachate evaporation was not observed being conducted at the facility during the inspection.

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ATTACHMENTS:

MW-7



Waste Tire Facility



Fluorescent Bulb Area



SOPF Facility



Closed 60 Acre Landfill



Inspection Date: 12/04/2020

Signed:

Alexis R Black

Inspector

PRINCIPAL INSPECTOR NAME**PRINCIPAL INSPECTOR TITLE**

DEP

12/23/2020

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

Melissa Madden

Senior Program Analyst

INSPECTOR NAME**INSPECTOR TITLE**

NO SIGNATURE REQUIRED

DEP

INSPECTOR SIGNATURE**ORGANIZATION**

Henry C. Norris, Jr.

Solid Waste Division Director

REPRESENTATIVE NAME**REPRESENTATIVE TITLE**

NO SIGNATURE REQUIRED

Citrus County BOCC

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.

Joshua Younce

Compliance Manager

REPRESENTATIVE NAME**REPRESENTATIVE TITLE**

NO SIGNATURE REQUIRED

Citrus County Solid Waste
Management Division**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:** 12/23/2020