



Board of County Commissioners

DEPARTMENT OF PUBLIC WORKS SOLID WASTE MANAGEMENT DIVISION

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January 29, 2021

Mary E. Yeargen, PG
Southwest District Director
Florida Department of Environmental Protection
13051 North Telecom Parkway # 101
Temple Terrace, Florida 33637-0926

RE: Citrus County Solid Waste Management Department
Citrus County Central Landfill
Permit No. 21375-025-SO-01
Response to Warning Letter #WL20-207SW09SWD and Inspection Report

Dear Ms. Yeargen:

In response to the subject Warning Letter dated December 28, 2020, we have been systematically addressing each issue and have prepared the attached responses. We have taken steps to make immediate repairs and are working with our engineers to handle more in-depth issues. As requested, we have provided photograph documentation of the work completed or a timeline for an item to be further addressed and evaluated. A permit modification will be prepared to revise the fill sequencing plan and to request the option of having two working faces; this modification will be submitted with the 5-year permit report due August 15, 2021.

As mentioned in the meeting with the Department on January 22, 2021, the County is committed to correcting all these issues and maintaining the site in compliance of our operating permit. We appreciate the opportunity to make these corrections and we appreciate your feedback and recommendations.

If you have any questions or comments, please feel free to contact me at (352) 527-7670.

Sincerely,

A handwritten signature in blue ink, appearing to read "Henry C. Norris, Jr.", is written over a horizontal line.

Henry C. Norris, Jr.
Citrus County Solid Waste Director

Attachments

XC: Kelley Boatwright, DEP Southwest District
Melissa Madden, DEP Southwest District
Steven Tafuni, DEP Southwest District
Alexis Black, DEP Southwest District
Phil Ciaravella, DEP Tallahassee
Commissioner Scott Carnahan, Chair, Citrus County
Joshua Younce, Citrus County Solid Waste Management
Troy Hays, Jones Edmunds
Carol Sawyer, Jones Edmunds
Alan Altman, Jones Edmunds

CITRUS COUNTY CENTRAL LANDFILL

RESPONSE TO FDEP

REGARDING ON-SITE INSPECTION

PERMIT NO.: Permit No. 21375-025-SO-01

FDEP WACS ID NO.: 39859

January 2021

The following information responds to the Florida Department of Environmental Protection On-site Inspection Letter and Checklist, dated December 28, 2020. Information is provided in the order in the referenced correspondence. In each case, the FDEP request is repeated in *italics* with the response immediately following in **bold**.

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RESPONSES TO COMMENTS

A. CURRENT VIOLATIONS:

1. Question 2.11: Rule 62-701.500(2)

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.

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 to the Department with information concerning when a modification to update the operation plan will be completed.

Response 2.11: The working face for residential customers has been discontinued and the landfill is only operating one working face in accordance with the facility's Operation Plan. A permit modification will be prepared to request the potential use of two working faces. This permit modification will be prepared as part of the 5-year permit report that is due by August 15, 2021.

2. Question 2.20: 62-701.500(11)(f), 62-701.500(7)(i)

Explanation: During the inspection, litter was observed at the facility outside of the area immediately adjacent to the workforce, 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.

Response 2.20: Litter has been removed from the stormwater swales, covered waste areas, and the anchor trench tie-in berms. Attachment 1 includes photographs. The County currently has in use 4 litter fences and is in the process of purchasing 8 additional fences. Procurement of the fences is underway and the expected board approval for purchase is in March of 2021.

3. Question 2.21: Rule 62-701.500(7)0)

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 in stabilized so as to prevent additional erosion from occurring in the future.

Response 2.21: The stormwater swale on the west side of the landfill in Phase I has been repaired. Attachment 2 provides photographs of the repairs.

4. Question 2.29: Rule 62-701.500(10)

Explanation: See Items 2.20, 2.21, and 2.22.

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

Response 2.29: Refer to Responses #2 and #3 above. Repairs have been performed and the litter removed.

B. PRE-EXISTING VIOLATIONS:

5. Question 1.6: 62-701.510(3), 62-701.510(4), 62-701.730(10), 62-701.730(8)(f), 62-713.400(3)

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 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.

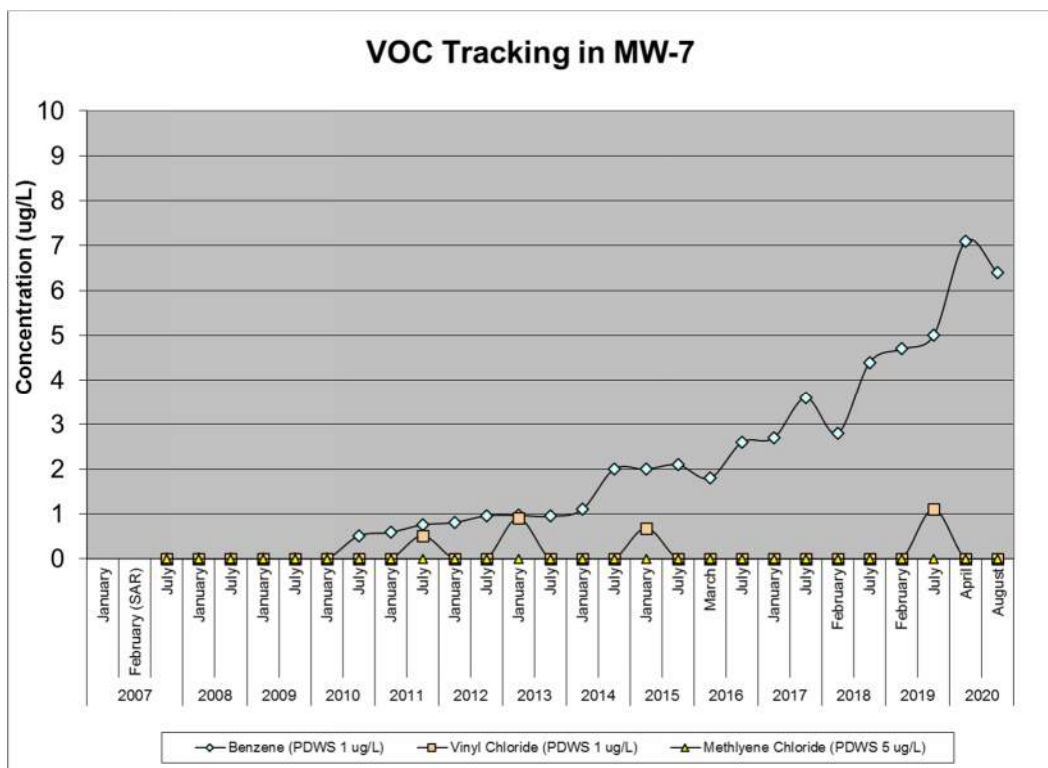
The Department also received and reviewed the Landfill Gas Assessment and Groundwater Delineation Report transmitted November 29, 2017 by email. A meeting was held on February 15, 2018 to discuss the County's proposed methods and timeframes for remediating migrating landfill gas, the next steps for assessment 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.

Response 1.6: The County is progressing with investigating potential damage to MW-19. We will be videoing the well riser to observe if it has been damaged. The status of the well videoing will be included in the First Semiannual 2021 Groundwater Monitoring Report.

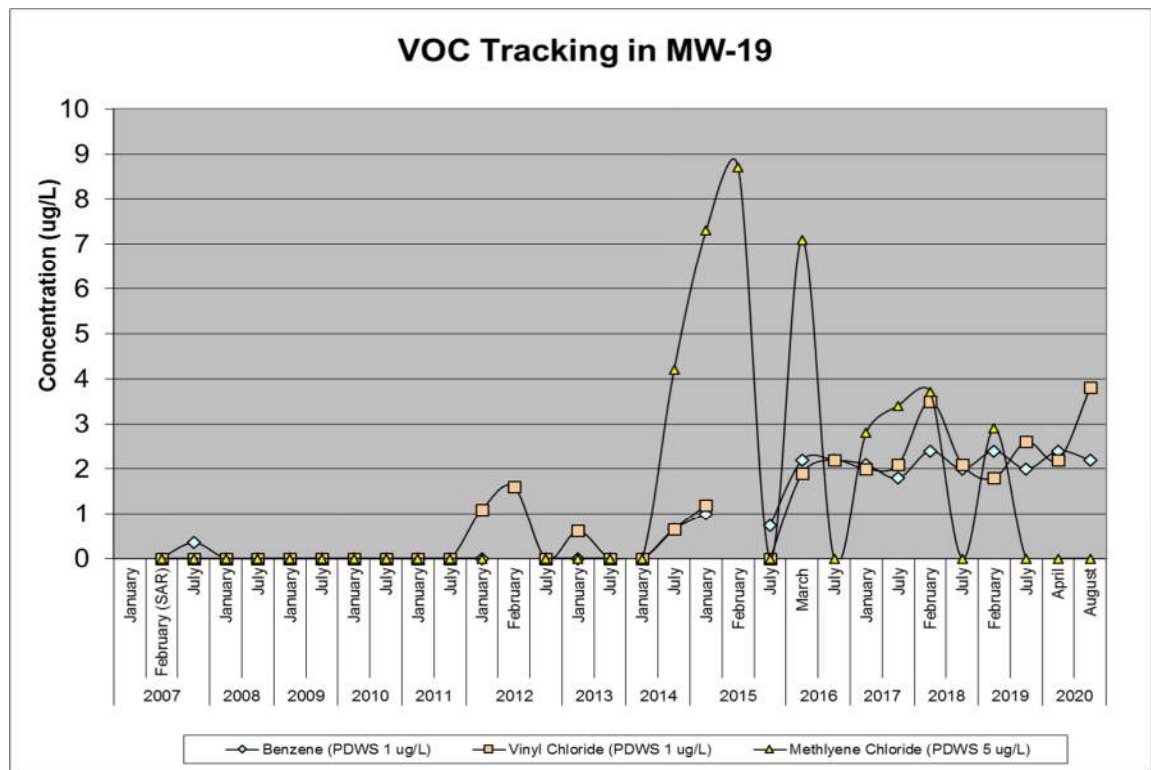
The landfill gas (LFG) migration control system has been on-line full-time since June 2020. At the on set, the system was running 5 days per week from 7 am until 4 pm during operating hours of the facility so that staff could monitor it. At the end of 2020, the run time increased to 7 days per week from 7 am until 7 pm (set on a timer). We are also monitoring/tuning the extraction well monthly.

We expected that the system would take some time to make an impact on the groundwater. We expected a year to start seeing improvements in the wells.

We observed a decrease in VOCs in MW-7 for the first time in over 2 years during the Second Semiannual 2020 sampling event. The decrease followed an increase during the First Semiannual 2020 event. The active LFG system started pulling LFG from around MW-7 at the beginning of 2020, whereas the LFG migration control system on the closed cells was not running until June 2020. The initial increase may be attributed to pulling more gas over near MW-7 followed by the initial decrease as we continued removing LFG and lowering the partial pressure on the groundwater in this area. Lowering the pressure drives the reaction back so that the VOCs stay in the gas and out of the groundwater. We expect these concentrations to continue to decrease as the system continues operation.



In MW-19D, we observed a slight decrease in Benzene but an increase in Vinyl Chloride during the Second Semiannual 2020 sampling event. Methylene Chloride, the most volatile of the three parameters and being the quickest to partition in and out of the groundwater, has been below the laboratory detection limit since the First Semiannual 2019 sampling event.



In addition, as documented in the Second Semiannual 2020 Groundwater Monitoring Report, MW-19D is installed with a deeper screened interval clustered with MW-19 to monitor for vertical migration in this area. VOCs reported in MW-19D were all below the laboratory detection limit during this sampling event indicating limited vertical migration in this area. MW-18 and MW-18D are installed downgradient of the MW-19 well cluster and screened at similar intervals. No VOCs were detected in either of the MW-18 wells.

The Second Semiannual 2020 event was conducted in August 2020, just after the LFG migration control system on the closed landfill cells was placed into full-time operation. We increased the runtime at the end of 2020 to increase the gas extraction efficiency and expect the VOC concentrations to decrease.

As discussed during our meeting on January 22, 2021, an in-depth evaluation of the LFG extraction system will be included in the First Semiannual 2021 Groundwater Monitoring Report along with an analysis of the parameters observed in MW-20. We will also discuss the elevated levels of Chloride, Sodium, Conductivity, and Total Dissolved Solids that have been observed in some of the wells in the semiannual report.

6. Question 2.18: Rule 62-701.500(7)(e)

Area: Phase III

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 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.

Response 2.18: The facility's compactor and dozer have been repaired, are back on site, and are in operation. The facility uses third parties for maintenance of their fleet. In cases where repairs cannot be made in a timely fashion, the County uses rental equipment. The County is procuring a new lease agreement for their equipment; the new lease agreement will include a requirement that the vendor will supply backup equipment within 24 hours of failure. The current lease agreement does not include this provision.

The contingency plan and equipment lists in the Operations Plan will be updated in the 5-year permit report that is due by August 15, 2021.

Additional initial cover has been placed in the central areas of Phase II and Phase III, and the County is applying more daily cover to ensure that adequate coverage exists. Attachment 3 provides photographs.

Question 2.19: Rule 62-701.500(7)(f)

Area: Phase I Landfill

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.

Response 2.19: Facility staff has repaired the bare spot on the north side slope of Phase I. Staff applied additional soil and cover to the area. Attachment 4 provides photographs.

7. Question 2.28: Rule 62-701.400(9)(b), 62-701.500(10)

Area: Phase III

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 discharging outside of the edge of disposal and possibly into the stormwater management system. Per email correspondence dated December 1, 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.

Response 2.28: The seep on the west side of the landfill was repaired. Attachment 5 provides photographs documenting the repair. The County will work with Jones Edmunds to evaluate the seeps at the site and identify methods to reduce the frequency of seeps at the site. FDEP noted that they require notification of leachate seeps within 24 hours of observation.

C. CURRENT AREAS OF CONCERN:

8. Question 2.13: Rule 62-701.500(2)(f)

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 11/111 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.

Response 2.13: As noted, the filling sequence does not match the filling plan shown in the Operation Plan. The current elevation in Phase I/1A is approximately 165 feet. Filling Phase I and IA has not taken place for several years, and the intent was to continue filling the landfill laterally and then to return later and fill out the top portion of the landfill.

The County will be revising the fill sequence plan to reflect current conditions and the intent of the filling. This modification will be submitted with the 5-year permit report due by August 15, 2021.

The most recent survey was submitted to FDEP with the December 2020 Capacity Analysis Report.

9. Question 2.25: Rule 62-701.530(3)(b)

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.

Response 2.25: County staff have inspected the perimeter of Phase III for excessive odors, bare spots, and exposed geonets. This activity has been added to the daily inspection log for County personnel to inspect daily.

10. Question 2.31: Rule 62-701.500(11)(b)

Explanation: At the time of 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, 202, 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.

Response 2.31: The facility's compactor and dozer have been repaired, are back on site, and are in operation. The facility uses third parties for maintenance of their fleet. In cases where repairs cannot be made in a timely fashion, the County uses rental equipment. The County is procuring a new lease agreement for their equipment; the new lease agreement will include a requirement that the vendor will supply backup equipment within 24 hours of failure. The current lease agreement does not include this provision.

11. Question 2.38: Rule 403.161, 62-701.320(1)

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.

Response 2.38: In 2017, during the design of the LFG migration control system and the gas collection and control system (GCCS) expansion, Jones Edmunds contacted FDEP's air and solid waste staff to discuss the project and to obtain guidance on permitting. We were directed that since the existing flare dedicated to the active landfill was not being modified, a

Title V permit modification was not needed. Attachment 6 provides copies of the emails regarding this. This item was also noted in the Title V permit renewal application that Jones Edmunds prepared and submitted in November 2020. The following paragraph was included in the permit renewal application:

On September 20, 2005, the Citrus County Board of County Commissioners (BOCC) executed Consent Agreement #05-1078 with FDEP to address issues of reported groundwater exceedances in downgradient groundwater monitoring wells since 2002 and exceedances of the lower explosive limit (LEL) for combustible gases (calibrated to methane) at the landfill gas (LFG) monitoring probes since November 2003. The County has been working with FDEP and actively addressing this issue. In 2018, Jones Edmunds designed an LFG migration-control system at the closed landfill cells to address the groundwater exceedances at the site. The LFG migration-control system design included connecting some of the existing passive LFG vents along the north portion of the closed landfill to a prefabricated, pre-wired blower skid station. This system applies negative pressure to the passive gas wells, induces low pressure inside the landfill area to create a preferential pathway for the gas generated, and inhibits lateral gas migration. The collected gas is then vented to the atmosphere through a 15-foot-high vent stack. Based on discussions with FDEP during the design process, we were given direction that a Title V permit modification was not needed for this system since we were not modifying the active flare system. However, a solid waste operation permit modification was required; the permit modification application was submitted to the FDEP Solid Waste Permitting Group in 2018¹.

12. Question 9.10: Rule 62-711.540(1)(d)

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.

Response 9.10: The annual fire report for 2020 was performed on May 12, 2020 and was submitted to FDEP with the third quarter waste tire report on October 12, 2020. Attachment 7 includes the 2020 fire survey.

D. PRE-EXISTING AREAS OF CONCERN

13. Question 2.22: Rule 62-701.500(2)0), 62-701.500(8)(b), 62-701.500(8)(h)

Area: Phase III

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 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.

Response 2.22: Please refer to the following responses:

- A) The County has the new leachate pumps on site and is awaiting the completion of the new electrical panels before replacing the pumps. The temporary well pumps that are currently in the leachate sumps are working as intended; if a failure occurs, the County will install the new on-site leachate pumps.**

B) The lightning protection on the current panels has been replaced, and the County is procuring new electrical control panels.

The new supervisory control and data acquisition (SCADA) system is running properly. As discussed during our January 22, 2020 meeting, FDEP approved the proposed set points in Jones Edmunds' Technical Memorandum dated December 9, 2020; accordingly, the new SCADA controls will be programed with the set points recommended in the Memorandum. We will meet with the vendor to adjust the set points and notify FDEP of any needed conversions in the telemetry to ensure that the system is operating and reading correctly.

C) As discussed during our January 22, 2021 meeting, we are not sure if calcification is occurring in the leachate pipes. Based on the pipe video, we suspect that the buildup is more likely sand infiltrating the pipes as it was all collecting in the bottom of the pipe as opposed to a ring around the pipe interior; however, this is speculation. We propose to continue observing the leachate collection and to re-evaluate at the next video and cleaning in 2025.

D) The corroded flange has been replaced; Attachment 8 provides a photograph. The County is progressing with soliciting bids for replacing the corroded lift station piping. Piping has been installed on the air-release valve so that it does not evacuate leachate into the air, and the leachate will flow through the tubing back into the wet well.

E) Noted. Future reports will include a narrative of the leachate system functionality.

14. Question 2.37: Rule 62-701.510(2)(b), 62-701.620(8)

Area: Closed 60-Acre Landfill

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 wall's overall condition within 30 calendar days of the date listed on the attached letter.

Response 2.37: The vegetation was not covering MW-21; it was covering an electrical box. However, the vegetation has been removed from the electrical box. Attachment 9 includes a photograph of MW-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.

Response 1.5: Noted. We will have at least three consecutive field readings taken before sampling of the monitoring wells.

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

Response 2.6.5: Thank you.

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

Response 2.24: The County is not currently conducting leachate evaporation.

Attachment 1
Litter Removal Photographs





Attachment 2

Repaired Stormwater Swale Photographs



Attachment 3

Phase II/III Initial Cover Photographs





Attachment 4

**Repaired Bare Spot on
North Slope Photograph**



Attachment 5

**Repaired Leachate Seep on
West Slope Photograph**



Attachment 6

Air Permit Documentation

Carol Sawyer

From: Carol Sawyer
Sent: Monday, November 16, 2020 2:09 PM
To: Henry.Norris@citrusbocc.com; Joshua L. Younce
Cc: Troy Hays; Matthew Morse
Subject: Citrus Title V Permit Renewal FDEP call
Attachments: RE: Citrus County Central Landfill questions; RE: Citrus County Central Landfill questions

Hello Henry,

I just spoke with Steve Morgan with FDEP. He said a pre-app meeting was not necessary unless we wanted something formal. This is a straight forward application so I don't think a formal meeting is needed.

We talked about the permit application and I let him know that we are not proposing any changes. We talked about the modifications made to the wellfield of the active system (new wells and pumps). Also I reminded him about the blower that was installed on the closed landfill side to help pull gas from the old waste. He was pleased to hear that this system appeared to be improving the groundwater conditions. I found documentation in my files from 2017 where FDEP said we did not have to include the blower at the closed landfill side in the air permit (see attached emails).

I am reviewing the draft application now and will send you a draft later this week to review.

Have a good afternoon.

Carol

Carol G. Sawyer, PE

Project Manager



p. 352.377.5821 x. 1356 | c. 352-214-5849

JONESEDMUNDS.COM

730 NE Waldo Road, Gainesville, FL 32641



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Carol Sawyer

From: Carol Sawyer
Sent: Wednesday, August 30, 2017 7:16 PM
To: 'Freedenberg, Henry'; 'Ciaravella, Philip'; 'Subramaniam, Pawan'; 'Dawson, John'
Cc: 'Jarmolowski, James'; Ruhaani Bhula
Subject: RE: Citrus County Central Landfill questions
Attachments: GCCS Exp and Migration_DRAFT plan sheets.pdf

All,

Attached are draft drawings for the proposed LFG expansion and migration control project. This is not the whole drawing set; notes, details, and electrical are not included. The design is at about 90%.

The following summarizes the major aspects of the design that we propose.

- Remove existing condensate traps (CT-2 and CT-1) and install a new condensate trap with pump on the west side and rebuild pumps in the existing CS-1 and CS-2.
- Re-drill 4 existing wells (EW-4 through EW-7) (abandon the old wells) and install 3 additional new wells.
- Install dewatering pumps for 3 wells (EW-1 through 3).
- Install 4 new horizontal gas collectors in Phase 2 and 3 (HC-1 through HC-4).
- Abandon 5 existing leachate cleanout riser remote wellheads (W-2, W-3, W-4, W-7, W-9) because they are poor gas producers, are watered in, and have high oxygen content.
- The electrical sheets for the gas migration control are not included because we need to update them to include the a blower package system.
- There are no proposed modifications to the existing flare – it has adequate capacity.

Please let me know if you have any questions. I am available anytime next week to discuss.

Thank you for your time and input.

Carol

Carol G. Sawyer, PE
Project Engineer
Jones Edmunds & Associates, Inc.
352.377.5821 ext. 1356 | Cell: 352-214-5849

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From: Carol Sawyer
Sent: Friday, August 25, 2017 9:48 AM
To: 'Freedenberg, Henry' <Henry.Freedenberg@dep.state.fl.us>; Ciaravella, Philip <Philip.Ciaravella@dep.state.fl.us>
Subject: RE: Citrus County Central Landfill questions

Henry,

Yes, I will try to send you draft sheets by the end of today or early next week.

Thanks,

Carol

Carol G. Sawyer, PE
Project Engineer

Jones Edmunds & Associates, Inc.
352.377.5821 ext. 1356 | Cell: 352-214-5849

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From: Freedenberg, Henry [<mailto:Henry.Freedenberg@dep.state.fl.us>]
Sent: Friday, August 25, 2017 9:42 AM
To: Carol Sawyer <CSawyer@jonesedmunds.com>; Ciaravella, Philip <Philip.Ciaravella@dep.state.fl.us>
Subject: RE: Citrus County Central Landfill questions

Good morning Carol

Do you have some conceptual drawings prepared that illustrate what you want to do?

Thanks

Henry

From: Carol Sawyer [<mailto:CSawyer@jonesedmunds.com>]
Sent: Friday, August 25, 2017 9:30 AM
To: Subramaniam, Pawan <Pawan.Subramaniam@dep.state.fl.us>; Dawson, John <John.Dawson@dep.state.fl.us>; Jarmolowski, James <James.Jarmolowski@dep.state.fl.us>; Freedenberg, Henry <Henry.Freedenberg@dep.state.fl.us>
Subject: RE: Citrus County Central Landfill questions

Good morning.

Thank you John and Pawan for getting back to me regarding the air permit.

Also, thank you Henry for talking with me this week on the solid waste side.

The existing flare (750 scfm) will not be modified. It has adequate capacity to handle the expansion. Based on the AOR for reporting year 2016 the average generation rate was about 110 scfm.

We are drafting drawings now and can send you a draft plan of the proposed expansion. I will send that to you all next week.

Regards,

Carol

Carol G. Sawyer, PE
Project Engineer
Jones Edmunds & Associates, Inc.
352.377.5821 ext. 1356 | Cell: 352-214-5849

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From: Subramaniam, Pawan [<mailto:Pawan.Subramaniam@dep.state.fl.us>]
Sent: Wednesday, August 23, 2017 11:08 AM
To: Dawson, John <John.Dawson@dep.state.fl.us>; Carol Sawyer <CSawyer@jonesedmunds.com>; Jarmolowski, James <James.Jarmolowski@dep.state.fl.us>
Subject: RE: Citrus County Central Landfill questions

Carol,

I agree with John's assessment that an air permit is not required unless the existing flare needs to be modified in any way to accommodate the expanded GCCS.

Pawan

Pawan Kumar Subramaniam, Ph.D.
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
850-717-9033
Pawan.Subramaniam@dep.state.fl.us

From: Dawson, John
Sent: Wednesday, August 23, 2017 10:29 AM
To: Carol Sawyer <CSawyer@jonesedmunds.com>; Jarmolowski, James <James.Jarmolowski@dep.state.fl.us>
Cc: Subramaniam, Pawan <Pawan.Subramaniam@dep.state.fl.us>
Subject: RE: Citrus County Central Landfill questions

Carol,

My first inclination is that an air permit likely wouldn't be needed, but I'll look into it further. Would there be any new/larger flares installed, or would the existing flare still be used as is?

I'm also cc'ing Pawan Subramaniam who could weigh in further.

John

John P. Dawson, Ph.D., P.E.
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399
John.Dawson@dep.state.fl.us
O: 850-717-9085

From: Carol Sawyer [<mailto:CSawyer@jonesedmunds.com>]
Sent: Tuesday, August 15, 2017 7:10 PM
To: Jarmolowski, James <James.Jarmolowski@dep.state.fl.us>; Dawson, John <John.Dawson@dep.state.fl.us>
Subject: Citrus County Central Landfill questions

Dear Mr. Dawson and Mr. Jarmolowski,

We are working with Citrus County on two projects at the Central Landfill:

1. Active GCCS Expansion Project: expand their active gas collection system.

2. Landfill Gas Migration Control Project: design a landfill gas migration system utilizing existing passive vents at the closed landfill.

The Central Landfill's permit numbers are as follows:

- Solid Waste: 21375-025-SO-01
- Title V: 0176366-006-AV

We are requesting direction from FDEP on whether permit modifications are required for the active GCCS expansion project and/or for the landfill gas migration project. Project details are as follows:

1. GCCS Expansion Project

The Central Landfill has a 32 acre active, lined disposal area (Phase 1, 1A, 2, and 3).

- The County elected to install an active gas collection system in 2010 (designed and permitted by SCS).
- The system consists of vertical gas collection wells and a 750 scfm flare with 1 blower.
- The landfill is not currently subject to the LFG collection and control system requirements of Subpart WWW.
- The wellfield is monitored monthly and Title V reports (AOR, SOC, semi-annual report) are submitted to FDEP.
- The County pursues greenhouse gas reduction credits per the Climate Action Reserve Landfill Protocol.
- The County wants to expand the system with additional vertical wells and horizontal wells.
- Jones Edmunds is in the process of designing the expansion. The new vertical wells will be 30 to 80 feet deep and will be a minimum of 20 feet off the bottom liner. No existing wells are proposed to be abandoned. We may propose some dewatering pumps.

2. Landfill Gas Migration Control Project

The County has been working with the Southwest District on a landfill gas assessment and groundwater delineation plan. The District approved installing new landfill gas monitoring probes and groundwater delineation wells on the north side of the closed site. The wells/probes are currently being installed. In an effort to augment the landfill gas collection in the closed landfill area, we are designing a system that will use some of the passive gas vents on the closed landfill and connect them to a small blower/vent (<5 HP blower motor). This project will include using existing vents and installing collection headers on the surface of the closed landfill. This project does not include installing new passive vents. The closed landfill area is in post closure care.

Is a solid waste or air permit modification required for the expansion and/or migration control project? When the projects have completed construction can we provide a report of the work completed and the record drawings to FDEP? We can also provide the bid documents (drawings and specs) before it goes to bid.

We appreciate your time and input. Please let me know if you need additional information.

Regards,

Carol

Carol G. Sawyer, PE
Project Engineer



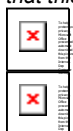
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www.jonesedmunds.com

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Carol Sawyer

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To: Dawson, John; Carol Sawyer; Jarmolowski, James
Subject: RE: Citrus County Central Landfill questions

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Pawan Kumar Subramaniam, Ph.D.
Florida Department of Environmental Protection
Division of Air Resource Management
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John P. Dawson, Ph.D., P.E.
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399
John.Dawson@dep.state.fl.us
O: 850-717-9085

From: Carol Sawyer [<mailto:CSawyer@jonesedmunds.com>]

Sent: Tuesday, August 15, 2017 7:10 PM

To: Jarmolowski, James <James.Jarmolowski@dep.state.fl.us>; Dawson, John <John.Dawson@dep.state.fl.us>

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We appreciate your time and input. Please let me know if you need additional information.

Regards,

Carol

Carol G. Sawyer, PE
Project Engineer



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Attachment 7
May 2020 Fire Survey Report

Citrus County Fire Rescue

FIRE PREVENTION INSPECTION REPORT

3600 W. Sovereign Path, Suite 141 • Lecanto, FL 34461 • 352-527-5527 • Fax 352-527-5404

Business Name: C.C. Lord F.I. Tire Storage Business Phone: 352-527-5576
 Physical Address: 230 W. Gulf to Lake Hwy Business Hours: _____
 Mailing Address: _____ City Limits: ☐ Y ☒ N Responsible Party: _____
 City: Lecanto Zip Code: _____ Contact Info: _____
 Plaza ☐ Yes ☒ No AED ☐ KNOX ☐ LWRT ☐ DRILLS ☐ CEMP ☐
 Unit # / Suite: _____ Type of Construction: II
 Owner/Manager: Michael Holst Station: 23 Occupancy Class: Storage
 Owner/Mgr. Phone #: 352-44-0674 Occupant Load: 500 Tires
 Email: _____ Square Footage: _____

☐ Initial ☒ Annual ☐ Re-inspection ☐ Request ☐ Complaint ☐ Other _____

CODE DEFICIENCIES:

STORAGE

- ☐ Improper storage of combustible material
- ☐ Storage too close to ceiling
- ☐ Storage too close to electrical panel
- ☐ Unsafe storage

EXIT DEFICIENCIES

- ☐ Exits inadequate number or capacity
- ☐ Aisles/corridors too narrow
- ☐ Exit door does not swing in direction of travel
- ☐ Door not equipped with approved exit hardware
- ☐ Exit doors inoperative or locked
- ☐ Exit blocked / obstructed
- ☐ Emergency lights not provided or working
- ☐ Exit sign (s) not illuminated
- ☐ Exit sign (s) battery not operable

EXTINGUISHERS

- ☐ Extinguishers not provided
 - ☐ Not proper type ABC - etc
 - ☐ Not inspected / tagged water - ok
 - ☐ Not visible / accessible Extinguishers
 - ☐ Inadequate number
 - ☐ Not charged / operable
 - ☐ Not properly installed
- Date last inspected: Sept 2019
 Company: Eucalydy
 Type: ABC Number: _____

ELECTRIC EQUIPMENT

- ☐ Overloaded circuits
- ☐ Electrical panel obstructed
- ☐ Electrical panel / boxes open
- ☐ Coverplate missing
- ☐ Temporary wiring / extension cords
- ☐ GFCI not functioning
- ☐ HVAC equipment not maintained

FIRE ALARM

- ☐ Fire alarm not provided
 - ☐ Log book not provided
 - ☐ Fire alarm does not meet code
 - ☐ Fire alarm not inspected / maintained
 - ☐ Smoke detector not provided
 - ☐ Smoke detector inoperative
- Date last inspected: _____
 Company: _____

SPRINKLERS/STANDPIPE

- ☐ System not inspected / maintained
 - ☐ Valves closed
 - ☐ Loaded sprinkler heads
 - ☐ Heads obstructed or too close to stock
 - ☐ FDC deficiency
 - ☐ Missing spare heads / wrench
- Date last inspected: Qtr. _____ Annual _____
 Company: _____
 System Type: _____

KITCHEN SUPPRESSION SYSTEM

- ☐ Filters missing or improperly installed
 - ☐ Extinguishment system not in accordance w/NFPA 96
 - ☐ Accumulation of grease in ducting
- Date last inspected: _____
 Company: _____

COOKING EQUIPMENT

- ☐ Accumulation of grease on/in cooking equipment
 - ☐ Cooking equipment maintenance
- Date last inspected: _____
 Company: _____

HOOD SYSTEM

- ☐ Hood & duct system not in accordance with NFPA 96
- Date last cleaned: _____
 Company: _____

Deficiencies noted below may cause a fire, contribute to the spread of fire, or cause undue injury in the event of a fire. Deficiencies must be corrected FORTHWITH.
 For additional information or assistance, please call: 352-794-5999. BUILDING PERMITS ARE REQUIRED FOR ALL RENOVATION / REPAIRS.

REQUIREMENTS / COMMENTS:

No deficiencies noted
Tire storage passed

Inspection Date / Time: 5/12/2020 Compliance Date: 24 3857
 Inspector: 141579 Gilliam Occupant Signature: _____
 Page 1 of 1 WHITE - office YELLOW - customer PINK - Rev. 11/17

Attachment 8

Corroded Flange Replaced Photograph





Attachment 9
MW-21 Photograph

