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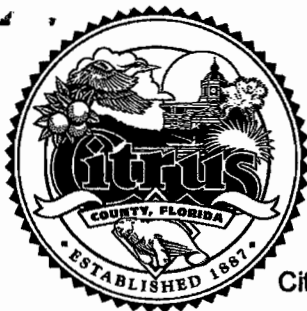
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holtgard_e

Date 7/26/10



Board of County Commissioners
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SOLID WASTE MANAGEMENT DIVISION

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3859
IASWPT

Dept. of Environmental
Protection

NOV 12 2009

November 6, 2009

Southwest District

Melissa Madden, Environmental Specialist
Solid Waste Section
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Re: Citrus County Central Landfill
Permit No. 21375-008-SO/01 and 126602-002-WT/02
Response to Site Inspection Comments received 10/15/2009

Dear Ms. Madden:

This letter is in response to the comments made on the inspection checklist during the inspection of our active landfill facility by you, accompanied by Carmen Bruno and me from Citrus County staff, on September 29, 2009 and provides some feedback to the new inspection process.

Your inspection comments, including inspection section and permit specific condition citation, are shown in *italics* followed by our response to each open violation and area of concern.

OPEN VIOLATIONS

None noted on inspection form.

PRE-EXISTING AREA OF CONCERN

Section: Landfill Operation and Maintenance

Question Number 2.13

Question: Is the operation plan substantially followed? 62-701-500(2)

Explanation: See Items 2.23, 2.30

Corrective action: See Items 2.23, 2.30

It is our understanding that this check mark on the inspection form must be entered if any other item is checked "Not Ok"; therefore our responses to items 2.23 and 2.30 constitute our response to this item.

Area: Phase I Landfill

Rule: 62-701.400(9) (c), 62-401.500 (10)

Question Number: 2.30

Explanation: A dark stained leachate seep was observed flowing through an erosional feature near the center of Phase II and had ponded along the top of the N slope (against a berm of a temporary leachate line extension gate valve). The seep appeared to initiate at an intermediately covered and mulched area of the N slope of Phase IA. Some erosional evidence observed suggested that the seep may have traveled beyond the pipe berm; however, two smaller berms to slow down stormwater were observed at lower elevations and would have likely contained any run-off. No further active seepage was observed

beyond the ponding at the top of the slope. Ponded leachate should be pumped off and the seep repaired with a low permeability cover material and the erosion re-graded.

During the inspection, Department staff observed erosion with exposed waste along the Phase I access road. Water was observed flowing along the erosion over the exposed waste (leachate) and to the west. Erosional evidence appeared to indicate that any water in this area would have been directed back east along the toe of slope and been contained by a berm to direct stormwater to the E. The continuity of the lower berm could not be confirmed due to heavy vegetation.

In Phase I, above the areas where the exposed waste was observed on the access road, tannic stormwater was observed flowing from mulch covered areas as small discreet lighter stained seeps. Operator indicated that the lighter staining was likely from the mulch cover (on top on intermediate) rather than true leachate seeps. Exposed waste and active seeps should be adequately covered and then re-graded to prevent ponding and promote flow to the stormwater system.

Corrective Action: Specific Condition C.6.a., C.12.b Department staff received documentation that the areas identified in this area of concern were addressed and repaired as of October 2, 2009.

RESPONSE: As stated under Corrective Action, an email from Ms. Susan Metcalfe to the inspector Melissa Madden was sent on October 2, 2009 documenting repairs of areas noted above. That being said it is our belief that the "dark stained leachate seep" that was observed flowing across Phase II was stormwater discolored by flow through our mulch. An erosional feature was observed which at its deepest point was no more than 4-6" into the intermediate cover. And, we agree that the erosional feature was the result of sheet flow across the intermediately covered and mulched the north slope of Phase IA collecting in a topographically low point on the slope. But given the fact that no waste was exposed in Phase II, and there was no evidence to suggest that exposed waste was present on the intermediately covered and mulched north slope of Phase IA, it is our contention that this was simply tannic stained stormwater runoff and should have been noted as such in the inspection report.

We do agree with the observations noted with respect to the temporary access road, which was repaired immediately as noted in the October 2, 2009 email. Additionally, erosion control measures in the form of mulch diversion berms have been placed along the high side of the access road to slow the flow of runoff down the access road (See Photo #1). It should be noted that September was a very wet month with 6.4 inches of rainfall which made the access road nearly impassible for inspections and repairs very difficult. On October 6, 2009 the certified operators were re-educated with respect to our expectations for documenting stormwater related issues during daily inspections.

*Area: Phase II Landfill
Rule: 62-701.500(7) (j)
Question Number: 2.23
Explanation: See 2.30*

RESPONSE: Following the inspection and the Citrus County Central Landfill's above stated response we believe that we have adequately addressed this area of concern.

*Rule: 62-701.320(1)
Question Number: 2.40
Explanation: See 2.23, 2.30*

RESPONSE: Following the inspection and the Citrus County Central Landfill's above stated response we believe that we have adequately addressed this area of concern.

Rule: 62-701.500(2)

Question Number: 2.13

Explanation: See 2.23, 2.30

RESPONSE: Following the inspection and the Citrus County Central Landfill's above stated response we believe that we have adequately addressed this area of concern

COMMENTS:

10/08/2009 - Reminder: Final leachate assessment report, videotape, and inspection report and water quality monitoring plan evaluations due Feb 1, 2010.

RESPONSE: The final leachate assessment report, videotape, and inspection report and water quality monitoring plan evaluation will be submitted by February 1, 2010.

09/29/2009 - Minor ponding observed in the YT area. The grinder contractor will be at the site on October 5 and the pad will be re-graded at that time.

RESPONSE: The yard waste area has been re-graded to mitigate ponding. See Photo #2.

09/29/2009 - Department staff observed bulbs in the Citizen Service Area in the open PVC tubes. Operator indicated that are boxed up inside the shed at the end of each day. Universal waste lamps should be managed in accordance with 40 CFR Part 273.13.

Department staff observed that the facility had purchased a bulb crusher for the HHW. This practice does not appear to be included in the facility's current HHW Operation Plan and may need to be included in future iterations of the report.

RESPONSE: The Citrus County Central Landfill will manage Universal waste lamps in accordance with 40 CFR Part 273.13. The HHW Operations Plan will include this practice in future iterations of the report.

09/29/2009 - The cover on the lower terrace of the south slope of Phase I could not be effectively evaluated due to overgrowth of vegetation. Facility staff indicated that the slopes would be walked down as soon as they are dry enough and should be completed by Dec/Jan.

RESPONSE: The overgrowth of vegetation has been addressed ahead of schedule due to the cooperation of the weather. See Photo #3.

02/29/2009 - The E lift station at the 7 acre cell is hooked up to a generator due to power outage. This system has been in place for several months. Facility indicated reclosure should begin by December.

RESPONSE: Permanent power to the east lift station on the 7-acre landfill will be restored as part of the reclosure project. On November 3, 2009, the BOCC awarded the contract for the 7-acre reclosure and the installation of the gas collection system to Belair Excavating of Naples, FL. FDEP will be notified 7 days in advance of the upcoming pre-construction meeting.

09/29/2009 - The 7 acre cell appeared very wet and vegetation was high. Facility plans to mow when the rainy season subsides.

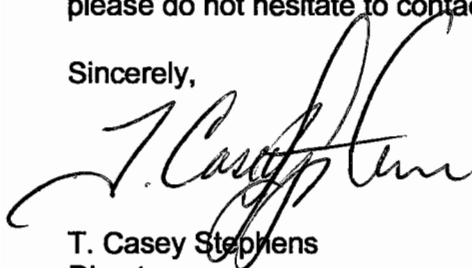
RESPONSE: As stated above the pending 7 acre reclosure project will address the wet areas. The vegetation has been mowed. See Photo #4.

09/29/2009 – Leachate ponding observed at base of bermed working face. A pump was observed for pumping the leachate prior to placing waste in the area. The leachate was being pump across the top of Phase II into temporary leachate collection piping via a gate valve.

RESPONSE: Any leachate that ponds inside the bermed area is removed prior to waste placement.

I trust this response addresses all applicable FDEP concerns regarding the September 29, 2009 inspection of the Citrus County Central Landfill. If you have any questions or need additional information please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Casey Stephens", is written over the typed name and title.

T. Casey Stephens
Director

TCS

Attachments

CC: Glenn McCracken, Director, Public Works Department



Photo #1: Access Road looking east showing mulch stormwater diversions



Photo #2: Yard Waste area re-graded



Photo #3: South slope of Phase I with vegetation removed



Photo #4: 7-acre cell with vegetation mowed

Madden, Melissa

From: Susan Metcalfe [Susan.Metcalfe@bocc.citrus.fl.us]
Sent: Friday, October 02, 2009 8:20 AM
To: Madden, Melissa
Cc: Casey Stephens
Subject: inspection followup
Attachments: DEP Response Back Ramp 10.01.09 002 (1).jpg; DEP Response Back Ramp 10.01.09 002 (2).jpg; DEP Response Back Ramp 10.01.09 002 (4).jpg; DEP Response Back Ramp 10.01.09 002 (10).jpg; DEP Response Back Ramp 10.01.09 002 (11).jpg; DEP Response Cell 10.01.09 001.jpg; DEP Response Cell 10.01.09 004.jpg; DEP Response Cell 10.01.09 016.jpg

Melissa

I have attached photos of the areas you were concerned about during your inspection on Tuesday. The erosion on the south ramp and the stained runoff area have been repaired. The weekend rainfall was 1.15 inches. Was there any other information you needed prior to completing the inspection report?

Susie

Susan Metcalfe, Director
Citrus County Solid Waste Management Division P.O. Box 340 Lecanto, FL 34460

352-527-7670 phone
352-527-7672 fax



10/01/2009





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