



Florida Department of
Environmental Protection
Inspection Checklist

FACILITY INFORMATION:

Facility Name: COYOTE DISPOSAL FACILITY

On-Site Inspection Start Date: 07/18/2011

On-Site Inspection End Date: 07/18/2011

WACS No.: 911

Facility Street Address: 2141 EAST 9TH STREET

City: PANAMA CITY

County Name: BAY

Zip: 32401

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Thomas Dillard, Inspector

Other Participants: Sandy Moore, Facility Manager & Operator; Raymond Hall, Spotter; Cale Powell, Mechanic; Charlotte Cope, Permit Engineer

INSPECTION TYPE:

Routine Operation Inspection for Waste Processing - Transfer Station facility

ATTACHMENTS TO THE INSPECTION CHECK LIST:

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

Inspection Date: 07/18/2011

Pre-existing Violations:

Rule: 62-701.710(4)(a)1.

Question Number: 4.14

Explanation: Waste is not being processed and removed in a thirty day time frame. The quantity of waste on-site may be exceeding the quantity of waste covered in the facility's financial assurance. Full containers of waste are not promptly removed from the facility.

Corrective Action: Remove all quantities of waste in excess of volume of waste covered by financial assurance. Promptly remove all full roll-offs of waste. Process all waste thru the facility in a 30 day time frame.

Comments:

06/09/2009

As of 6-4-09 there was on-site more than six times the amount approved with the financial assurance. estimates show that there were more than 12,481 cu.yds of waste debris on-site during the visit.

06/22/2010

As of 6-14-10 facility tonnage records reflect that tonnage on-site had been reduced from 5200 tons on 6-4-09 to 871 tons on 6-14-10. This is a reduction in tonnage on-site by 84%. Documentation provided on 6-22-10 that all waste tires (38 tons) in rollofs have been picked up by Tire Disposal Services.

12/17/2010

On 11-10-10 on-site records reflect that there was 640 tons of waste on-site. No Class 3 waste has been shipped off-site since 6-22-10 over 152 days. Only C&D waste is being shipped off-site leaving Class 3 household wastes taking up most of the waste piles on-site. Records reflect that beginning 2010 there were 3349 tons of waste on-site and as of 11-10-10 there were 640 tons on-site.

07/27/2011

As of 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement as noted in comments. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

Rule: 62-701.320(1)

Question Number: 4.26

Explanation: Facility not following requirements specified in its permit application and operations plan as submitted with permit application in regards to process time frame and container management.

Corrective Action: Manage as required in operation plan

Comments:

06/09/2009

Facility was observed to be shipping more processed waste out than coming so far in 2009. Records show 4856 tons received and 5797 tons out. Improvement noted. Waste on-site measured to be over six times that quantity allowed with approved financial assurance.

09/15/2009

On 9-2-09 a review of the waste log reflected that more waste is being processed and shipped off-site than the amount of waste being received. Improvement noted and overall reduction of the

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quantity of waste on-site is being reduced. Since the 6-4-09 visit the facility has reduced the total quantity of waste on-site. Improvement noted with more reduction still needed.

12/02/2009

On 11-24-09 the facility continues to have more unprocessed waste on-site than covered in its financial assurance even though a continued progress in reducing the quantity on-site is noted. Stored containers of waste (C&D and Class 3) are not being shipped off-site in the 30 day time frame specified in its operations plan. presently there are 10 rolloff containers of waste tires on-site.

01/25/2010

On 1-14-10 the facility continues to have more waste on-site than covered in its financial assurance.

06/22/2010

As of 6-14-10 facility records reflect that tonnage on-site has been reduced by 84% compared to tonnage on-site on 6-4-09 one year previous. Documentation provided on 6-22-10 that all waste tires (38 tons) in rolloffs have been picked up by Tire Disposal Services.

07/27/2011

As of 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement as noted in comments. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

07/27/2011

As of 6-15-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement as noted in comments. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

Rule: 62-701.710(4)(a)1.

Question Number: 4.14

Explanation: Records reflect that for 2009 outgoing processed waste tonnage exceeds incoming tonnage. On-site quantity of waste still greatly exceeds that amount provided for in approved financial assurance. Facility continues to not show evidence of processing waste within thirty days of receipt.

Corrective Action: Remove all waste exceeding approved storage limits and process all waste within 30 days of receipt.

Comments:

09/02/2009

On 9-2-09 the quantity of waste on-site was visibly reduced but quantities still present exceeded amount approved by financial assurance. Facility records reflect quantity of waste being processed and shipped off-site in 2009 continues to exceed quantity received. Progress noted but long way to go to be within allowable level.

12/02/2009

On 11-24-09 the amount of waste still requiring processing still exceeds the amount covered in its financial assurance and stored C&D and Class 3 waste is not being processed and shipped off-site in the 30 days time frame described.

01/25/2010

On 1-14-10 reviewed facility records reflect that the tonnage of waste processed and shipped out continues to exceed incoming tonnage. In 2009 outgoing tonnage exceeded incoming by over 3315 tons. Incoming waste (other than C&D debris) not being processed and shipped offsite in a

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30 day time frame.

06/22/2010

Facility has reduced tonnage on-site on 6-4-09 by 84% as of 6-14-10.

12/17/2010

On 11-10-10 records reflect that on-site there were 640 tons of waste. The overall weight of waste on-site continues to decrease but the volume of waste continues to be grow as heavy C&D waste is continuously shipped off-site but household wastes (mattresses and furnishings) continue to not be shipped off-site.

07/27/2011

On 6-15-11 and 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement as noted in comments. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

Rule: 403.161, 62-701.320(1)

Question Number: 4.24

Explanation: Permit Number 0007948-003-SO, Specific Condition Number 17 requires all monitoring wells as described in Specific Condition Number 15, shall be sampled semiannually. The results of each set of semiannual groundwater shall be submitted, under separate cover, by January 31 and July 31, commencing with the January 31, 2006 report.

Corrective Action: Perform groundwater monitoring as required by permit.

Comments:

05/17/2011

Delinquent groundwater monitoring reports include:

July 2008

January 2009

July 2009

January 2010

July 2010

January 2011

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. A review of Department records failed to show performance of semiannual groundwater monitoring or submittal of required reports. Delinquency continues.

Rule: 62-701.510(2), 62-701.730(4)(b), 62-713.400(3), 62-701.730(10)

Question Number: 1.6

Explanation: Required sampling, testing and reporting continues to be not performed and submitted to Department.

Corrective Action: Meet requirements.

Comments:

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring

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at facility with no visible improvement seen in Department records file review. Groundwater monitoring and reporting continues delinquent.

Rule: 62-701.710(4)(a)1.

Question Number: 4.12

Explanation: Waste not being processed within 30 days as indicated by enormous quantity of waste on-site.

Corrective Action: Follow requirements in permit and operations plan.

Comments:

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

Rule: 62-701.300(1)(a)

Question Number: 4.1.1

Explanation: Quantity of waste tires on-site estimated between 1500 and 2000. This classifies the site as a un-permitted waste tire site.

Corrective Action: Remove and properly dispose of all screened waste (ie waste tires) within 30 days of receipt and have on-site less than 1500 tires at all times.

Comments:

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. Quantity of waste tires on-site estimated to exceed 2100 and not shipped off-site in the 30 day time frame. Mass of waste on-site continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

Rule: 62-701.710(4)(a)1.

Question Number: 4.12

Explanation: The Operations Plan states "stored C&D and Class III waste is removed within 30 days."

Corrective Action: Remove and properly dispose of all Class III waste on site more than 30 days. Do not accept any additional Class III waste until the facility is compliant with the approved Operation Plan in accordance with permit requirements.

Remove and properly dispose of all C&D waste which has been on site more than 30 days.

Remove and properly dispose of all waste tires which have been on site more than 30 days.

Comments:

05/17/2011

Class III wastes received are not being removed within 30 days. There is a large quantity of Class III

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wastes on site.

C&D waste and yard trash are being removed. I observed two loads of C&D and yard trash loaded while on site; however, it appears that more than 30 days of C&D waste remain on site.

Waste tires are separated from the Class III and C&D wastes and stored in roll-off containers on site. Waste tires appear to have been onsite greater than 30 days.

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame. Quantity of waste tires on-site estimated as exceeding 2100 and have not been removed from site within 30 day time frame.

Pre-existing Areas Of Concern:

Rule: 62-701.510(3), 62-701.510(4)

Question Number: 1.7

Explanation: This report does not evaluate compliance with required groundwater/surface water monitoring. Department staff assigned to review groundwater/ surface water monitoring reports for this facility will address compliance issues if necessary in separate correspondence.

Comments:

06/09/2009

This report continues to not reflect on water quality of groundwater monitoring.

07/27/2011

As of 7-18-11 Department personnel observed non-compliant condition recurring at facility as records review reflects groundwater monitoring not being performed and reported as required.

Rule: 62-713.600(6)(b), 62-701.710(7)(b), 62-701.730(11)(b), 62-701.630(4), 62-711.500(3), 62-701.710(10)(a), 62-713.600(6)(c)

Question Number: 1.10

Explanation: Cost estimates for financial assurance not adjusted to cover quantity of waste on-site.

Corrective Action: Adjust financial assurance accordingly.

Comments:

12/02/2009

As of 11-24-09 Department records do not show that the amount of financial assurance for the facility has been increased to handle the amount of waste on-site.

01/25/2010

As of 1-25-10 Department records do not show that the amount of financial assurance for the facility has been increased to handle the amount of waste on-site.

12/17/2010

As of 11-10-10 financial assurance still does not cover the quantity of waste on-site.

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07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

Rule: 62-701.300(8)(c), 62-701.300(11)(a), 62-701.300(8)(e), 62-701.300(6), 62-701.300(8)(d), 62-701.300(4), 62-701.300(11)(b), 62-701.300(5), 62-701.300(10), 62-701.300(8)(a), 62-701.300(9)

Question Number: 4.8

Explanation: Waste tires have been screened from wastestream but not shipped off-site within the 30 day storage limit. Presently 10 rolloff containers of waste tires on-site.

Corrective Action: Remove and properly dispose of all waste tires on-site that exceed 30 days storage on-site.

Comments:

12/02/2009

As of 11-24-09 the facility continues to properly screen waste tires from the wastestream but so far in 2009 no waste tires have been shipped off-site and now 10 rolloffs or tires are on-site. The operations plan submitted with the permit application in 2007 and approved reflects that stored Class 3 and C&D waste is to be removed in 30 days. Approximately 2000 waste tires are on-site in roll-off containers.

01/25/2010

1-14-10 - No waste tires have been shipped off-site in 2009 and 10 open top rolloffs of waste tires continue on-site. Quantity of waste tires estimated around 2000.

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame. Quantity of waste tires estimated as exceeding 2100 and not being shipped off-site in the 30 day time frame.

Rule: 62-701.630, 62-711.500(3), 62-701.710(7)(a), 62-701.730(11)(a), 62-701.710(10)(a), 62-713.600(6)(a)

Question Number: 1.9

Explanation: The quantity of waste on-site exceeds the amount covered in the facility's financial assurance.

Corrective Action: Reduce quantity of waste to within amounts covered in financial assurance.

Comments:

12/01/2009

On 11-24-09 the quantity of waste on-site has decreased but visually still exceeds the quantity of waste covered in its financial assurance. Waste records continue to reflect more waste being processed and shipped off-site than incoming. Progress noted.

01/25/2010

On 1-14-10 the quantity (tonnage) of waste on-site continues to decrease but visually the volume of waste still exceeds the quantity of waste covered in its financial assurance. Waste records continue to reflect more waste being processed and shipped off-site than incoming. Progress continues.

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06/23/2010

As of 6-14-10 the quantity of waste on-site still exceeds the amount covered in its financial assurance. In the last 12 month period the facility has reduced the tonnage of waste on-site by 84%. Progress noted but still not down to calculated tonnage allowed in financial assurance to Department.

12/17/2010

As of 11-10-10 the quantity of waste on-site still exceeds the quantity allowable in the financial assurance.

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

Rule: 62-701.710(4)(a)1.

Question Number: 4.12

Explanation: Waste is not being processed within a 30 day time frame. Processed waste is not being shipped off-site within 30 days.

Corrective Action: process waste within 30 days of receipt and ship processed waste off-site within 30 days.

Comments:

12/17/2010

On 11-10-10 Class 3 wastes and waste tires not being processed and shipped off-site in a 30 day time frame.

07/27/2011

As of 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement as noted in comments. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame. Quantity of waste tires on-site estimated as exceeding 2100.

Rule: 62-701.630, 62-701.710(7)(a), 62-701.730(11)(a), 62-711.500(3), 62-701.710(10)(a), 62-713.600(6)(a)

Question Number: 1.9

Explanation: Financial assurance not adequate to cover quantity of waste on-site.

Corrective Action: Meet financial assurance requirements.

Comments:

07/27/2011

As of 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility as the quantity of waste on-site continues to greatly exceed financial assurance coverage.

Rule: 62-701.710(4)(a)1.

Question Number: 4.12

Explanation: Class 3 Wastes received are not processed in & out in the 30 day time frame

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described in the operations plan.

Corrective Action: Follow requirements in permit and operations plan.

Comments:

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

Rule: 62-701.510(2), 62-701.730(4)(b), 62-713.400(3), 62-701.730(10)

Question Number: 1.6

Explanation: Required ground water monitoring reports not submitted to Department as required.

Corrective Action: Perform groundwater monitoring as required and directed by Department.

Comments:

07/27/2011

As of 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility as records review failed to reflect performance or reporting of groundwater monitoring as required..

Rule: 62-701.630, 62-701.710(7)(a), 62-701.730(11)(a), 62-711.500(3), 62-701.710(10)(a), 62-713.600(6)(a)

Question Number: 1.9

Explanation: Excessive quantity of waste on-site exceeds amount of financial assurance (FA).

Corrective Action: Adjust financial assurance to cover waste on-site or reduce waste to coverable quantity in FA..

Comments:

07/27/2011

On 6-15-11 and on 7-18-11 Department personnel observed non-compliant condition recurring at facility with no visible improvement seen. Quantity of waste continues to exceed volume covered in financial assurance and waste still not being processed and shipped off-site in the required 30 day time frame.

COMMENTS:

07/26/2011

The facility was inspected on 7-18-11 with the following observed:

1. More waste continues to be stored on-site than observed in many years. An attempt was made to estimate the total volume of waste using Toughbook GPS but cloud conditions impaired efficiency. Photos taken and attached show the quantity of waste present. With records not kept up on-site during Ms. Moore's (operator of facility) absence the site was unable to indicate the amount of waste processed or un-processed currently on-site. (RECURRING)
2. Waste scales continue to be broken and waste weights estimated using factors.(RECURRING)
3. Since Ms. Moore returned to site on 6-13-11 on-site waste records have been kept and available for review. A Department review reflected that in June 2011 (from 6-13 to 7-1) an estimated 736 tons of waste was received and an estimated 965.4 tons were processed and shipped out. Records further reflect that in June, an estimate of 648.7 tons of mixed waste went to Springhill Landfill and

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an estimate of 316.7 tons of C&D to the Coyote C&D in Freeport (Coyote East). This reflects that the amount of waste on site for June decreased by approximately 229.4 tons. Improvement noted but volume of waste continues to exceed amount covered in financial assurance and waste still not being processed and shipped off-site in the required 30-day time frame.

4. To date, July records reflect that the facility has shipped off approximately 79.1 tons of waste to the Coyote C&D facility (East) and nothing elsewhere.

5. Nine roll off containers of waste tires were present on-site and many tires loose on the ground and scattered in waste awaiting processing. Quantity estimated by roll off volume to exceed 1,500 and upward of 2,100 waste tires on-site. Waste tires not being removed from site in the 30 day time frame. (RECURRING)

6. Actions to correct used oil management containers on-site are in progress of being corrected. Used oil management to be addressed in separate Hazardous waste inspection report.

7. Waste visibly not being processed within 30 days of receipt. (RECURRING)

8. Waste previously noted to be very close to pushing over into the adjacent area (outside permitted footprint) has been addressed and now visibly was observed to not extend outside the permitted disposal area.

Personnel have pulled back questionable waste along that side. Improvement noted

9. Monitoring wells not inspected during site visit.

10. Conditions on-site have not improved and continue to be non-compliant as previously noted.

11. No waste storage activity observed in adjacent Area B. The Department has denied the facility's yard trash processing registration application based on its ongoing non-compliant status as an irresponsible applicant.

12. Next to the scale house, Inspectors found an accumulation of approximately 40 spent fluorescent lamps in 5 taped bundles. Lamps were precariously stored but fortunately still intact with no broken lamps visible. Management of these lamps will be addressed in separate Hazardous waste inspection report.

ATTACHMENTS:

Waste 7-18-11



Waste 7-18-11



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Waste Tires



Spent lamps



Waste tires



Waste 7-18-11



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Signed:

Thomas Dillard	Inspector
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE
<i>Thomas Dillard</i>	FDEP
PRINCIPAL INSPECTOR SIGNATURE	ORGANIZATION
	7/27/2011
	DATE

Charlotte Cope	Permit Engineer
INSPECTOR NAME	INSPECTOR TITLE
<i>Charlotte A Cope</i>	FDEP
INSPECTOR SIGNATURE	ORGANIZATION
	7/27/2011
	DATE

Sandy Moore	Facility Manager & Operator
REPRESENTATIVE NAME	REPRESENTATIVE TITLE
NO SIGNATURE	Coyote Disposal Facility
REPRESENTATIVE SIGNATURE	ORGANIZATION

Raymond Hall	Spotter
REPRESENTATIVE NAME	REPRESENTATIVE TITLE
NO SIGNATURE	Coyote Disposal Facility
REPRESENTATIVE SIGNATURE	ORGANIZATION

Cale Powell	Mechanic
REPRESENTATIVE NAME	REPRESENTATIVE TITLE
NO SIGNATURE	Coyote Land
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.