Florida Department of

Environmental Protection

Inspection Checklist

FACILITY INFORMATION:

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

On-site Inspection Start Date: 11/06/2020

On-site Inspection End Date: 11/06/2020

WACS No.: 89544

Facility Street Address: 1501 OMNI WAY

City: SAINT CLOUD

County Name: OSCEOLA

Zip: 34773

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Amada M Fernandez, Inspector

Other Participants: Benjamin Gray, District Manager;

INSPECTION TYPE:

Routine Operation Inspection for Landfill - Class I

Routine Operation Inspection for WPF - Waste Tire Processing Facility

ATTACHMENTS TO THE INSPECTION CHECKLIST:

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

Note: Checklist items with shaded boxes are for informational purposes only.

1.0 - SECTION 1.0 - FILE REVIEW

2.0 - SECTION 2.0 - LANDFILL OPERATION AND MAINTENANCE

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

Inspection Date: 11/06/2020

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) ☐ Waste reports (annually) 62-701.500(4) ☐ 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)				✓

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) ☐ 100 feet from potable water wells (except on-site)? ☐ 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) ☐ Hazardous waste 62-701.300(4) ☐ Biomedical waste 62-701.300(6) ☐ Yard trash 62-701.300(8)(c) ☐ Whole waste tires 62-701.300(8)(e) ☐ Regulated asbestos waste 62-701.520(3), 62-701.730(19) ☐ Used oil and oily wastes, except as exempted 62-701.300(11) ☐ PCB wastes 62-701.300(5) ☐ Lead-acid batteries 62-701.300(8)(a) ☐ White goods 62-701.300(8)(d) ☐ Liquids 62-701.300(10) ☐ CCA treated wood 62-701.300(14) ☐ Biological waste - Disposal of dead animals due to disease 62-701.520(5)(a) ☐ Biological waste - Disposal of dead poultry and hatchery residue 62-701.520(5)(b) ☐ 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.) ☐ Yes ☐ No ☑ 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) ☐ Training Plan 62-701.320(15)(a) ☐ Operating Plan 62-701.500(2) ☐ Waste weight records 62-701.500(4) ☐ Precipitation records 62-701.500(8)(g) ☐ Load-checking program records 62-701.500(6)(a) ☐ Training records 62-701.320(15)(a) ☐ Operation record 62-701.500(3) ☐ 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.	✓			

COMMENTS:

Current landfill operations are outlined in permit 0199726-033-SO-01, issued 6/13/17 and expires 6/13/27. This permit authorizes operation of Phases I through 5, which includes Cells 1 through 15. Modifications to the permit are outlined in permit 0199726-037-SO-MM, issued 6/28/19, and include an update to the operation plan. Changes to the operation plan include the addition of Posi-Shell spray-on product as an alternate initial cover material and update to the leachate treatment facility. Construction permit 0199726-031-SC-01 authorizes the construction of Phase 4, Cell 12 and Phase 5, Cells 14 and 15 over a 10-year period, issued 9/7/16 and expires 9/7/26. Construction of Cells 12 is complete.

Item 1.2 - The 2020 annual estimate of remaining life was 9/25/20. The 2019 annual waste report was received 2/4/20.
Items 1.3 and 1.4 - The 4th quarter 2019 gas report was received 1/13/20. The 1st quarter 2020 gas report was received 4/14/20. The 2nd quarter 2020 has report was received 7/3/20. The 3rd quarter 2020 gas report was received 9/24/20.
Item 1.5 - The 2020 1st semi-annual water quality monitoring report was received 2/11/20. The 2020 2nd semi-annual water quality monitoring report was received 9/4/20. The 7th 2.5-year Technical Report on Water Quality was received 9/30/19.
Item 1.6 marked unknown - The water quality report is reviewed as a separate function and is not deemed part of this inspection report.
Item 1.8 - In an email dated 11/3/20, Susan Eldredge stated the facility is in compliance with financial assurance requirements as of 5/5/20.
Item 1.9 - The 2020 closure cost estimate was received 2/29/20.

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

Waste is currently being placed Cell 12. The facility currently has two working faces on Cell 12. The facility performs load checks at least 3 times a week. The facility is using alternate cover materials including 50/50 mulch/soil blend, tarps, processed tires, contaminated soils, posi-shell and topcoat.

The operators and spotters on-site were David Collins, Leslie Weeks, Jesus Urbina, Porfirio Castaneda-Cavillo and Jose Sanchez. Training Records are up to date.

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

The inspector was unable to drive the perimeter road along Cells 2, 3 and 6 due to road conditions. Mr. Gray stated the facility recently secured funds to redo the perimeter road in 2021.

Some litter was protruding through the cover on Cells 8 and 12, and some wind-blown litter was also observed on Cells 8 and 12. There was a litter fence on Cell 12 and a litter crew was picking up litter at the time of the inspection. Mr. Gray stated the facility employs two full-time laborers for litter cleanup and hires additional temporary labor when necessary. Mr. Gray stated the slopes of Cells 8 and 12 were redressed last week due to high wind conditions and that the facility planned to seed the slopes the week of November 9, 2020, and planned to redress the slopes every two weeks until grass is growing on the slopes.

The leachate generated on-site is pumped to one of three leachate storage ponds on-site. A leachate evaporator system is on-site and is used as the primary method of leachate treatment/disposal (Permit 0199726-039-SO-21). The facility keeps records of leachate evaporation, and the records were reviewed on-site. Leachate that is not processed by the leachate evaporator is sent to Aqua Clean Environmental Company for treatment/disposal. In emergency situations, leachate is sent to Liquid Environmental Solutions for treatment/disposal. In extreme emergency situations, the facility recirculates leachate. The facility has recirculated leachate this year, and leachate recirculation records were reviewed on-site.

Waste Connections has completed the project meant to address leachate seeps and to prevent future seeps on the eastern and western slopes. In accordance with the Corrective Action Plan submitted by Waste Connections in January 2020, Waste Connections hired contractors who have installed exposed geo-membrane covers (EGCs) and/or toe interceptors on the outer slopes of the eastern slopes (Cells 3, 6, 9, 10, 11, and 13) and on the western slopes (Cells 5, 7, and 8). No leachate seeps were noted during the inspection. Waste Connections provided a report with a summary of the project on November 10, 2020.

Waste Connections has also engaged a consultant for designing dewatering wells to potentially deal with areas where liquids are not draining as desired. Waste Connections is awaiting the design and possible deployment locations from the consultant, Golden Associates.

ATTACHMENTS:

Leachate evaporator



Leachate ponds



Waste tire storage



Working face



EGC on eastern slopes



EGC on western slopes



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Inspection Date: 11/06/2020

Signed:

Amada M Fernandez	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
	DEP	11/16/2020
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Benjamin Gray	District Manager
REPRESENTATIVE NAME	**REPRESENTATIVE TITLE**
NO SIGNATURE REQUIRED	Waste Connections
REPRESENTATIVE SIGNATURE	**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Report Approvers:

Approver: Jill M. Farris **Inspection Approval Date:** 11/19/2020