



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

November 23, 2021

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

RE: Notice of Evaluation Monitoring for Monitoring Wells MW-7 & MW-20
Citrus County Class I Central Landfill
230 West Gulf to Lake Highway, Lecanto 34461
WACS Facility ID No. 39859
DEP Permit No. 21375-025-SO-01

Dear Mr. Norris:

The Florida Department of Environmental Protection (Department) has reviewed groundwater monitoring reports submitted for the referenced facility as required by Permit 21375-025-SO-01 to evaluate ground water quality at various locations around the permitted landfill and property. A review of the last twelve supplemental sampling events (First Semiannual 2016 through the Second Semiannual 2021) indicates the following groundwater standards and minimum criteria were exceeded during multiple sampling events conducted during this timeframe:

- Monitoring well MW-7 (WACS Testsite No. 179), a designated background well completed in the Floridan aquifer exceeded groundwater standards/minimum criteria and/or resulted in concentrations significantly above background levels for Benzene. Periodic exceedances of other volatile organic compounds during this period have included Vinyl Chloride and Methylene Chloride. Arsenic has been detected at concentrations above groundwater standards/minimum criteria as well.
- Monitoring well MW-20 (WACS Testsite No. 23691), a designated compliance well (but not located at the edge of the zone of discharge) completed in the Floridan aquifer exceeded groundwater standards/minimum criteria and/or resulted in concentrations significantly above background levels for Arsenic and Iron. Benzene has been detected at concentrations above groundwater standards/minimum criteria as well.

Appendix 3, Section I, Specific Condition 4 of the approved Water Quality Monitoring Plan included in Permit No. 21375-025-SO-01, provides the opportunity for the permittee to conduct a

confirmatory sampling event within 30 days of receipt of laboratory data that indicates parameters are present at concentrations significantly above background or that exceed the Department's water quality standards or minimum criteria. As no subsequent confirmatory resampling events were submitted, the Department considers the results of the samples collected during the First Semiannual 2016 through the Second Semiannual 2021 to be representative of ground water conditions at the facility.

Appendix 3, Section I, Specific Condition 4 of the approved Water Quality Monitoring Plan also states that upon notification by the Department, the permittee shall initiate evaluation monitoring, prevention measures and corrective action as described in Rule 62-701.510(6)(a), Florida Administrative Code (F.A.C.). This letter serves as written notice that implementation of evaluation monitoring is required, including the following:

1. In accordance with Rule 62-701.510(6)(a)1., F.A.C.: Continue routine monitoring of all monitoring wells and surface water monitoring locations as specified in the above-referenced permit.
2. In accordance with Rule 62-701.510(6)(a)2., F.A.C.: **Within 90 days of the date of this letter**, background well MW-7 and compliance well MW-20 shall be sampled and analyzed for the parameters listed in Rule 62-701.510(7)(c), F.A.C. and a laboratory report submitted to the Department. Any new parameters detected and confirmed in MW-7 and/or MW-20 shall be added to the routine ground water monitoring parameter lists required in the referenced permit (per Rule 62-701.510(6)(a)2., F.A.C.).
3. In accordance with Rule 62-701.510(6)(a)3., F.A.C.: **Within 90 days of the date of this letter**, two compliance wells shall be installed at the edge of the zone of discharge upgradient from monitoring well MW-7. The locations shall be located upgradient from MW-7 rather than downgradient based on the location being designated as a background well and the unique pathway proposed as the potential source of contamination (i.e. landfill gas migration into groundwater). The zone of discharge has been established as extending horizontally 100 feet from the limits of the liner. The well locations and well construction details should be approved by the Department prior to construction. The compliance wells shall be installed according to the requirements of Rule 62-701.510(3)(d), F.A.C. and be screened to obtain representative ground water samples at 135-145 feet Below Land Surface (BLS) and 155-165 feet BLS. The compliance wells shall be sampled and analyzed for the parameters listed in Rule 62-701.510(7)(a), F.A.C. and any other parameters detected in MW-7 and quarterly thereafter. The compliance wells and affected background well shall be sampled and analyzed annually for the parameters listed in Rule 62-701.510(7)(c), F.A.C.
4. In accordance with Rule 62-701.510(6)(a)3., F.A.C.: **Within 90 days of the date of this letter**, one compliance well shall be installed at the edge of the zone of discharge downgradient from monitoring well MW-20. The zone of discharge has been established as extending horizontally 100 feet from the limits of the liner. The well location and well

construction details should be approved by the Department prior to construction. The compliance well shall be installed according to the requirements of Rule 62-701.510(3)(d), F.A.C. and be screened to obtain representative ground water samples at 105.7-125.7 feet BLS. The compliance well shall be sampled and analyzed for the parameters listed in Rule 62-701.510(7)(a), F.A.C. and any other parameters detected in MW-20 and quarterly thereafter. The compliance wells and affected background well shall be sampled and analyzed annually for the parameters listed in Rule 62-701.510(7)(c), F.A.C.

5. In accordance with Rule 62-701.510(6)(a)4., F.A.C.: **Within 180 days of the date of this letter**, please submit a Contamination Evaluation Plan to the Department. The plan shall be designed to delineate the extent and cause of the contamination, predict the likelihood that Department water quality standards will be violated outside the zone of discharge and evaluate methods to prevent any such violations.
6. Upon agreement between the Department and the permittee that the Contamination Evaluation Plan is appropriately designed, the plan shall be implemented, and a Contamination Evaluation Report shall be submitted in accordance with the schedule presented in the plan. All reasonable efforts shall be made by the permittee to prevent further degradation of water quality from the facility's activities.
7. In accordance with Rule 62-701.510(6)(a)5., F.A.C.: If the quarterly groundwater laboratory reports or the Contamination Evaluation indicates that water quality standards or criteria are likely to be violated outside the zone of discharge, the permittee shall, within 90 days, submit a Prevention Measures Plan to the Department. Upon the Department's approval, the permittee shall initiate preventative measures to prevent such violations.
8. If any contaminants are detected and confirmed in the compliance wells in concentrations that exceed both background levels and Department water quality standards or criteria, then the permittee shall notify the Department within 14 days of this finding and shall either pursue a demonstration that the exceedance is not related to the solid waste disposal unit in accordance with the requirements of Rule 62-701.510(6)(a), F.A.C., or shall initiate corrective actions that shall comply with the applicable provisions of Chapter 62-780, F.A.C.

The Department's agency action shall become final unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

Petitions by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice. Petitions filed by other persons must be filed within 14 days of publication of the notice or receipt of the written notice, whichever occurs first. Under Section 120.60(3), F.A.C., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of such notice, regardless of the date of publication. The petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;
- (d) A statement of all material facts disputed by petitioner or a statement that there are no disputed facts;
- (e) A statement of the ultimate facts alleged, including a statement of the specific facts which the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

[INTENTIONALLY LEFT BLANK]

If you have any questions, please contact Steven Tafuni at 813-470-5792 or via email at Steven.Tafuni@floridadep.gov. In an effort to reduce costs and waste, the agency is requesting all future submittals be sent in electronic format.

Sincerely,



Kelley M. Boatwright
Southwest District Director
Florida Department of Environmental Protection

KB/ab

ec: Melissa Madden, DEP Southwest District, Melissa.Madden@floridadep.gov
Steven Tafuni, DEP Southwest District, Steven.Tafuni@floridadep.gov
Alexis Black, DEP Southwest District, Alexis.Black@floridadep.gov
Pamala Vazquez, DEP Southwest District, Pamala.Vazquez@floridadep.gov
Phil Ciaravella, DEP Tallahassee, Phillip.Ciaravella@floridadep.gov
Joshua Younce, Citrus County Solid Waste Management,
Joshua.Younce@citrusbocc.com