



FLORIDA DEPARTMENT OF Environmental Protection

Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

September 1, 2022

Kirk Wills, Southern Region Engineer
Waste Connections
1501 Omni Way
St. Cloud, FL 34773
kirk.wills@wasteconnections.com

Re: Warning Letter
J.E.D Landfill
SW Facility ID #89544
Osceola County

Dear Mr. Wills:

A routine compliance inspection was conducted at your facility on July 12, 2022. During this inspection, possible violations of Chapter 403, F.S. and Chapter 62-701, Florida Administrative Code (F.A.C.) were observed.

During the inspection Department personnel noted the following:

- The leachate collection system was not operating as designed, a temporary system has been placed into service to collect leachate.
- Leachate seeps were noted along the landfill access road in Cell 13, this road led up to the landfill's working face. Leachate was also noted to be mixed with storm water in the temporary drainage ditch along this road. Leachate seeps were noted in the previous solid waste inspection conducted on 11/26/2019.
- Portable pumps were noted in the permitted storm water collection system on the slopes of the landfill. These pumps were directing a mixture of storm water and leachate to the onsite leachate storage ponds. The storm water pipes leading to the perimeter storm water detention ponds were blocked with inflatable blocks to ensure this mixture was contained.


Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 403.161 and 403.121, Florida Statutes.

Please contact Jenny E. Farrell, at (407) 897-4173, within **7 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any

facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Watkins", with a stylized flourish at the end.

Aaron Watkins, Director
Central District
Florida Department of Environmental Protection

AW/jef

Enclosure: Inspection Report

cc: Kory Broussard, Waste Connections, kory.broussard@wasteconnections.com
Kenny Stover, Waste Connections, kenny.st@wasteconnections.com



**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: 07/12/2022
On-site Inspection End Date: 07/12/2022
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: Jenny E. Farrell, Inspector

Other Participants: Dale Melton, Environmental Consultant; Sarah Fayed, Environmental Specialist III;
Kory Broussard, Assistant District Manager; Kenny Stover, Southern Region
Engineer; Hailey Ambrose, Environmental Consultant;

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

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

Inspection Date: 07/12/2022

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) <input type="checkbox"/> Waste reports (annually) 62-701.500(4) <input type="checkbox"/> 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)				✓

Inspection Date: 07/12/2022

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) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 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) <input type="checkbox"/> Hazardous waste 62-701.300(4) <input type="checkbox"/> Biomedical waste 62-701.300(6) <input type="checkbox"/> Yard trash 62-701.300(8)(c) <input type="checkbox"/> Whole waste tires 62-701.300(8)(e) <input type="checkbox"/> Regulated asbestos waste 62-701.520(3), 62-701.730(19) <input type="checkbox"/> Used oil and oily wastes, except as exempted 62-701.300(11) <input type="checkbox"/> PCB wastes 62-701.300(5) <input type="checkbox"/> Lead-acid batteries 62-701.300(8)(a) <input type="checkbox"/> White goods 62-701.300(8)(d) <input type="checkbox"/> Liquids 62-701.300(10) <input type="checkbox"/> CCA treated wood 62-701.300(14) <input type="checkbox"/> Biological waste - Disposal of dead animals due to disease 62-701.520(5)(a) <input type="checkbox"/> Biological waste - Disposal of dead poultry and hatchery residue 62-701.520(5)(b) <input type="checkbox"/> 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.) <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A				

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

Inspection Date: 07/12/2022

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) <input type="checkbox"/> Training Plan 62-701.320(15)(a) <input type="checkbox"/> Operating Plan 62-701.500(2) <input type="checkbox"/> Waste weight records 62-701.500(4) <input type="checkbox"/> Precipitation records 62-701.500(8)(g) <input type="checkbox"/> Load-checking program records 62-701.500(6)(a) <input type="checkbox"/> Training records 62-701.320(15)(a) <input type="checkbox"/> Operation record 62-701.500(3) <input type="checkbox"/> 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-	✓			

Inspection Date: 07/12/2022

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.	✓			

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

Inspection Date: 07/12/2022

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES**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
9.1.1	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)	✓			
9.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
9.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
9.3	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)	✓			
9.4	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)	✓			
9.5	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
9.6	If the facility accepts tires from the public, is a sign posted at the facility entrance stating operating hours, cost of disposal and site rules? 62-711.540(1)(a)	✓			
9.7	Are operations involving the use of open flames conducted no closer than 25 feet of a waste tire pile? 62-711.540(1)(b)	✓			
9.8	If the facility accepts tires from the public, is an attendant always present on site when the site is open for business? 62-711.540(1)(c)	✓			
9.9	Are fire protection services assured through notification to local fire protection authorities? 62-711.540(1)(d)	✓			
9.10	Is an annual fire safety survey conducted? 62-711.540(1)(d)				✓
9.11	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)				✓
9.12	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e)	✓			
9.13	Does the EPM contain the following information? (Check all that are Not OK) <input type="checkbox"/> Contact names and numbers 62-711.540(1)(e)1 <input type="checkbox"/> List of emergency response equipment and locations on-site 62-711.540(1)(e)2 <input type="checkbox"/> Procedures to be followed in the event of a fire 62-711.540(1)(e)3	✓			
9.14	Is the operator at the facility maintaining records of the quantity of waste tires received at the site, stored at the site, and shipped from the site? 62-711.540(1)(g) and 62-711.400(5)	✓			
9.15	If the operator of the site is not the owner of the property, has written authorization been obtained from the property owner to operate the facility? 62-711.540(1)(h)	✓			
9.16	Is adequate communications equipment available at the site? 62-711.540(1)(i)	✓			
9.17	Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711.540(1)(j)	✓			

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

Inspection Date: 07/12/2022

Item No.	WASTE TIRE FACILITY - STORAGE INDOORS	Ok	Not Ok	Unk	N/A
9.18	Are waste tire piles more than 50 feet in width? 62-711.540(2)(a)				✓
9.19	Are waste tire piles along a wall more than 25 feet in width? 62-711.540(2)(a)				✓
9.20	Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b)				✓
9.21	Is there less than 3 feet of clearance between the top of storage to sprinkler detectors or roof structures? 62-711.540(2)(c)				✓
9.22	Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(d)				✓
9.23	If waste tires are stored up to 15 feet high, do walls between adjacent warehouse areas and between manufacturing and warehouse areas have at least a four-hour fire rating? 62-711.540(2)(e)				✓
9.24	If waste tires are stored over 15 feet high, do walls between manufacturing and warehouse areas have a fire rating of not less than six hours and do steel columns have one-hour fireproofing? If the top of storage exceeds 20 feet in height, do columns and their connections with other structural members have two-hour fireproofing? 62-711.540(2)(f)				✓
9.25	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(2)(h)				✓
Item No.	WASTE TIRE FACILITY - STORAGE OUTDOORS	Ok	Not Ok	Unk	N/A
9.26	Is the waste tire site operated within 200 feet from a body of water? 62-711.540(3)(a)	✓			
9.27	Does the waste tire pile have a width less than 50 feet? 62-711.540(3)(b)	✓			
9.28	Does the waste tire pile have an area less than 10,000 sq. ft? 62-711.540(3)(b)	✓			
9.29	Does the waste tire pile have a height less than 15 feet? 62-711.540(3)(b)	✓			
9.30	Is there a 50 feet wide fire lane around the perimeter of the waste tire pile? 62-711.540(3)(c)	✓			
9.31	Is there unobstructed access to the fire lane? 62-711.540(3)(c)	✓			
9.32	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d)	✓			
9.33	Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711.540(3)(f)	✓			
9.34	Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711.540(3)(e)	✓			
9.35	Are residuals contained on-site and disposed of in a permitted solid waste management facility or properly recycled? 62-711.540(5)	✓			
9.36	Does the waste tire site qualify for the exceptions to the technical and operational standards as allowed by rule? 62-711.540(6)	✓			
Item No.	WASTE TIRE FACILITY - COLLECTION CENTER	Ok	Not Ok	Unk	N/A
9.37	Are no more than 1,500 tires at the collection center at any one time? 62-711.550(1)(a)	✓			
9.38	Are all waste tires, which are not used tires, removed from site yearly for recycling, processing, or disposal? 62-711.550(1)(b)	✓			

Inspection Date: 07/12/2022

Current Violations:

Rule: 62-701.500(2)(j), 62-701.500(8)(b), 62-701.500(8)(h)

Question Number: 2.22

Explanation: The landfill operator is responsible for the operation of the leachate collection and removal system and for maintaining the system as designed for the design period. Leachate shall be collected and treated as necessary so that water quality standards and criteria are not violated. If the leachate is classified as a hazardous waste, it shall be managed in accordance with Chapter 62-730, F.A.C. Leachate treatment or disposal facilities that may be used shall be identified in the operating plan, and the Department shall be notified as to which facility is actually being used.

Specifically on the day of inspection the leachate collection system was operating under a temporary design closed loop system and not as the permitted designed system.

Corrective Action: Provide the Department with a design plan for the temporary leachate collection system and an estimated length of time that this system will be in place.

Attachments:

Temporary Change Leachate West #2



Temporary Change Leachate West #3



Temporary Change Leachate East #1



Temporary Change Leachate East #2



Inspection Date: 07/12/2022

Temporary Change Leachate West #1



Rule: 62-701.400(9)(b), 62-701.500(10)

Question Number: 2.28

Explanation: Stormwater or other surface water which comes into contact with the landfilled solid waste or mixes with leachate shall be considered leachate and is subject to the requirements of subsection 62-701.500(8), F.A.C.

Specifically on the day of inspection leachate seeps were noted along the landfill access road in Cell 13, this road led up to the landfill working face. Leachate was also noted to be mixed with storm water in the temporary drainage ditch along this road, although it did not appear to be discharging off the landfill and into the surrounding storm water ponds. Leachate seeps were noted in a previous solid waste inspection conducted on 11/26/2019.

Corrective Action: According to an email received by the Department on 07/15/2022, a new sump with pump has been installed at the Cell 13 seep, along the landfill access road. No further information is needed at this time.

Attachments:

Leachate Seep Picture #1



Leachate Seep Picture #2



Inspection Date: 07/12/2022

Leachate Seep Picture #3



Leachate Seep Picture #4



Leachate Seep Picture #5



Corrective Action 07/15/2022



Rule: 62-701.500(10)

Question Number: 2.29

Explanation: Stormwater system management. Stormwater management systems shall be operated and maintained as necessary to meet the requirements of subsection 62-701.400(9), F.A.C.

Specifically on the day of inspection portable sumps were pumping a mixture of storm water and leachate out of the permitted storm water conveyance system on the slopes of the landfill and the storm water pipes to the surrounding storm water detention ponds were blocked with inflatable blocks to ensure this mixture was contained and pumped to the leachate ponds.

Corrective Action: Provide the Department with a design plan for the temporary leachate collection system and an estimated length of time that this system will be in place.

COMMENTS:

Permit:

Current landfill operations are covered under permit #0199726-033-SO-01, which was issued on 06/13/2017 and will expire on 06/13/2027. This permit authorizes the operation of Phases 1 through 5, which includes Cells 1 through 15. Modifications to the permit are outlined in permit #0199726-037-SO-MM, which was issued on 06/28/2019, changes included an updated operation plan, including the addition of Posi-Shell spray-on product as an alternate initial cover material and an update to the leachate treatment facility. The 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, which was issued on

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

Inspection Date: 07/12/2022

09/07/2016 and will expire on 09/07/2026. The construction of Cell 14 was completed and the Certificate of Construction Completion (CCC) report was received by the Department on 02/08/2022. Permit modification #0199726-040-SO-MM issued on 06/11/2021 included the installation and operation of a leachate evaporator and incorporated the facilities Leachate Evaporation Plan as an attachment.

File Review:

Item 1.2 - The 2021 Estimate of Remaining Life was received on 09/09/2021. The 2020 & 2021 Annual Waste Reports were received on 01/22/2021 & 01/10/2022.

Items 1.3 and 1.4 - The 4th Quarter 2020 Gas Report was received on 01/11/2021. The 1st Quarter 2021 Gas Report was received on 04/01/2021. The 2nd Quarter 2021 Gas Report was received on 07/05/2021. The 3rd Quarter 2021 Gas Report was received on 10/11/2021. The 4th Quarter Gas Report was received on 01/31/2022.

Item 1.5 - The 2021 1st Semi-Annual Water Quality Monitoring Report was received on 05/05/2021. The 2021 2nd Semi-Annual Water Quality Monitoring Report was received on 10/12/2021. The 8th 2.5-year Technical Report on Water Quality was received on 03/31/2022.

Item 1.6 (Unknown) - The water quality reports are reviewed as a separate function and are not deemed part of this inspection report activity.

Item 1.8 - In an email dated 07/11/2022, the Departments Financial Assurance section stated the facility was in compliance with financial assurance requirements at this time.

Item 1.9 - The 2021 Cost Estimate was received on 02/25/2021 and approved on 02/26/2021. The 2022 Cost Estimate was received on 02/23/2022 and approved on 02/24/2022.

Waste Tire Handling:

This 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 the permit). The facility is current on the quarterly records as required by the WTPF permit, the last report quarterly report was received on 07/06/2022 for the 2nd Quarter 2022.

Facility Site Inspection:

Items 2.8 & 2.9 - The operators and spotters onsite were Karen Smith, Porfirio Castaneda-Cavillo, and Jose Sanchez. Training records were noted onsite at the time of inspection.

Item 2.10 - All required documentation was noted to be onsite and available for review at the time of inspection.

Item 2.11 - The onsite Operations Plan reviewed was dated June 2019.

Item 2.13 & 2.15 - The working face was located in Cell 12 at the time of inspection and waste was being placed and compacted in this area. This facility was performing and documenting random load checks in an area adjacent to working face location at least 3 times a week.

Item 2.18 & 2.19 - The facility is using alternate cover materials including 50/50 mulch/soil blend, tarps, and spray cover (hydroseed). Exposed geo-membrane (EGCs) were installed and completed in 2020 as part of project to prevent future leachate seeps on the eastern (in Cells 3, 6, 9, 10, 11, and 13) and western (in Cells 5, 7, and 8) slopes of the landfill. The EGCs cover the outer slopes and/or toe interceptors.

Item 2.20 - Litter fences are utilized at the working face to assist in controlling windblown litter from this area. Three full-time laborers are employed as a litter crew that routinely cleanup litter on the property and access roadways. Some litter flagging was noted along the southern access road in Cells 13 and 12. A few pieces of windblown litter were noted in the northern storm water perimeter ponds at the time of inspection.

Item 2.21 - At the time of inspection a large gully was noted at the bottom of Cell 3 slope. According to an email with corrective action picture received by the Department on 07/15/2022, the Cell 3 slope had been restored and was scheduled to be hydroseeded within one week. It was also mentioned that other areas would be "touched up" while the company was onsite at the landfill into to prevent further erosion.

Item 2.22 - See additional comments and pictures in the violation cited.

Item 2.23 - According to onsite personnel, multiple loads of leachate are hauled to the City of St. Cloud

Inspection Date: 07/12/2022

WWTF (5 loads daily) or by Aqua Clean (2 loads daily) at least five days a week.

Item 2.24 - The facility is permitted to recirculate and evaporate leachate, but at the time of inspection these activities were not occurring, the facility was only storing and hauling leachate away routinely.

Item 2.25 - No objectionable odors were noted at the time of inspection.

Item 2.28 - See additional comments and pictures in the violation cited.

Item 2.29 - Some accumulated sediment was noted in the perimeter storm water ponds around the landfill at the time of inspection. The southwestern perimeter road and storm water ponds in this area have maintenance performed recently.

Item 2.33 & 2.34 - Water trucks are utilized for both dust and fire protection at this facility.

Item 2.36 - At the time of inspection the entire perimeter of the landfill was accessible with a vehicle via the landfill perimeter access road.

Item 2.38 - According to onsite personnel, the every 5-year submittal noted in Section 2.A.6 of the current permit that was due on 06/13/2022, was submitted to the Department on 06/11/2022. At the time of inspection it was stated by onsite personnel that the Waste Solidification activity is not being conducted.

ATTACHMENTS:

Leachate Ponds #1



Leachate Ponds #2



Waste Tire Storage Area



Working Face #1



Inspection Date: 07/12/2022

Working Face #2



Working Face #3



Working Face #4



Looking NE at Litter Fences on WF



Looking East at Cell #14



Corrective Action 07/15/2022



Inspection Date: 07/12/2022

Signed:Jenny E. FarrellInspector**PRINCIPAL INSPECTOR NAME****PRINCIPAL INSPECTOR TITLE**Jenny E. FarrellFDEP CD08/09/2022**PRINCIPAL INSPECTOR SIGNATURE****ORGANIZATION****DATE**Dale MeltonEnvironmental Consultant**INSPECTOR NAME****INSPECTOR TITLE**NO SIGNATURE REQUIREDFDEP CD**INSPECTOR SIGNATURE****ORGANIZATION**Sarah FayedEnvironmental Specialist III**INSPECTOR NAME****INSPECTOR TITLE**NO SIGNATURE REQUIREDFDEP CD**INSPECTOR SIGNATURE****ORGANIZATION**Kory BroussardAssistant District Manager**REPRESENTATIVE NAME****REPRESENTATIVE TITLE**NO SIGNATURE REQUIREDWaste 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.

Kenny StoverSouthern Region Engineer**REPRESENTATIVE NAME****REPRESENTATIVE TITLE**NO SIGNATURE REQUIREDWaste Connections**REPRESENTATIVE SIGNATURE****ORGANIZATION**

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Hailey AmbroseEnvironmental Consultant**REPRESENTATIVE NAME****REPRESENTATIVE TITLE**

Inspection Date: 07/12/2022

NO SIGNATURE REQUIRED

FDEP CD

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: David Smicherko

Inspection Approval Date: 08/25/2022
