

**INSPECTION REPORT FORM  
AIR POLLUTION EMISSION SOURCES**

<b>FACILITY:</b> Omni Waste of Osceola County, LLC Oak Hammock Disposal Facility		<b>DISTRICT:</b> Central District	<b>COUNTY:</b> Osceola
<b>ADDRESS:</b> 1501 Omni Way St. Cloud, FL 34473		<b>CONTACT:</b> Mike Kaiser 386-947-2952	
<b>AIRS#:</b> 0970079	<b>PERMIT #:</b> 0970079-003-AC	<b>EXPIRATION DATE:</b> June 30, 2010	
<b>SOURCE DESCRIPTION:</b> EU1 – Municipal Solid Waste Landfill with Gas Extraction EU2 – Phase I-Class I Landfill Gas Collection System Flare 1 EU3 – Phase II-Class I Landfill Gas Collection System Flare 1			
<b>INSPECTION DATE:</b> January 13, 2009	<b>AUDIT TYPE:</b> Level 2	<b>COMPLIANCE STATUS:</b> In-compliance	
<b>INSPECTION COMMENTS/RECOMMENDATIONS:</b>  On January 13, 2009, Ms. Wanda Parker-Garvin, Mr. Rodell Rice, Ms. Caroline Shine, and Mr. Allen Rainey of Florida Department of Environmental Protection visited the subject facility to conduct an annual inspection. Contact was made with Mr. Mike Kaiser, of Omni Waste, Mr. Kevin Brown and Mr. Don Griggs of Golder Associates, and Kurt Wills, of Geosyntec. Mr. Wills stated that the facility flare was in operation and Mr. Kaiser stated the facility had 27 wells installed in Phase I. Ms. Shine discussed the Visible Emissions test (VE) requirements according to the rule and asked when the facility plans to conduct a VE on the flare. Ms. Shine asked the facility to contact the Department by Friday, January 16, 2009 to schedule a pre-test meeting date.  Ms. Shine reviewed the Operation and Maintenance plan with the group. Mr. Kaiser shared his viewpoint on the 4-to-1 slope verses the 3-to-1 slope. Ms. Shine questioned the facility's alternative surface emissions remedial action plan and the exclusion of active areas from wellhead monitoring. Both of the activities require prior approval from the Department.  Mr. Wills said they currently have 5 wells reading temperatures above 139° F. Mr. Kaiser asked what the procedure for handling the tempeature issue was. Ms. Shine suggested that they should to contact Leigh Pell in the Tallahassee office of DEP and ask for a variance for high temperature wells. The facility has 120 days to attempt to fix the exceedance problem and they must notify the Department upon resolution or by the 120 day timeframe. . Mr. Brown discussed that the possible build up of water in the pipeline may be the problem and how to test the pipelines for water.  Ms. Shine reviewed the Startup, Shutdown, and Malfunction (SSM) plan and said the facility well head exceedances should be included in the SSM plan because it is addressed in the rule. Ms. Shine reviewed the SSM forms and asked that the form include more information about the corrective action performed. Ms. Shine asked what happens when the flare shuts down. Mr. Griggs said the shutoff valve closes and the flare tries to restart automatically. Ms. Shine asked that the facility send the Department documentation on the flare automatic valve shut-off operations.  There was a discussion on surface monitoring. Mr. Griggs explained his interpretation on the corrective action steps for an exceedance. For the first exceedance, record the exceedance and perform corrective action steps. Ten days later recheck the well. Record the 2 <sup>nd</sup> exceedance and perform corrective action steps. Recheck the well again after ten days. If a 3 <sup>rd</sup> exceedance occurs, record the exceedance and perform corrective action steps. Recheck the well again in 30 days from the first exceedance recorded date. Record the temperature. If the temperature is still exceeding, contact the Department and requesta variance. Ms. Shine told the facility that all request for alternative monitoring procedures should be sent to DARM in Tallahassee.  Ms. Shine reviewed some of the facility's records and explained to thereports/recordkeeping requirements to the facility. Ms. Shine asked about the facility's shutdowns and explained that anything over and hour of flare downtime is a violation.			
<b>INSPECTOR(S) NAME(S):</b> <p style="text-align: center;">Rodell Rice</p>			
<b>SIGNATURE(S):</b>			<b>DATE:</b> January 20, 2009

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<b>INSPECTION COMMENTS/RECOMMENDATIONS:</b>  Ms. Shine asked that the monitoring parameter permit limits be listed on the monitoring reports. Ms. Shine proceeded to complete the applicable sections of the Appendix G On-Site Inspection Checklist. Mr. Kaiser stated there is a sampling port installed at each well head and a thermometer. The flare has an ultraviolet sensor to indicate the presence of a flame. The flare uses a digital device to record the gas flow data and the information is downloaded onto a disk weekly. The disk is brought back to the office and downloaded onto a computer. The surface concentrations of methane will be monitored on a quarterly basis and the calibration procedures are being followed before conducting surface monitoring.  Mr. Kaiser provided a plot map of the wells which Ms. Shine reviewed. Ms. Shine asked if the facility has a designated asbestos area. Mr. Kaiser said the asbestos disposal waste is put on a daily grid with latitudes/longitudes for GPS tracking purposes. Ms. Parker-Garvin asked if signage was displayed at those areas. Mr. Kaiser said no. Ms. Parker-Garvin asked if the asbestos waste was properly bagged to prevent mixing with the other waste. Mr. Kaiser said the asbestos waste is checked in at the weigh station and plotted. Mr. Kaiser was not aware of the exact procedures for upcoming asbestos wastes.  Ms. Shine reviewed some of the records required by the permit and discussed her concerns. Ms. Shine asked that the monthly records include tonnage. Mr. Kaiser said he would send the Department the yearly totals in tonnage and he provided the 3 <sup>rd</sup> quarter data. Ms. Shine asked that the facility expand the information on the corrective action documentation and provide a more detailed description of the codes. Mr. Kaiser said they were working with Ms. Debbie Valin of DEP on the P2 project. Mr. Kaiser said he would submit the additional records to the department at a later time.  Mr. Kaiser, Mr. Brown, and Mr. Griggs accompanied Ms. Parker-Garvin, Mr. Rice, Ms. Shine, and Mr. Rainey on an inspection of the flare station and several monitoring wells. At the flare station, the observed gas flow was 570 scfm and the flare temperature was 1278° F. Mr. Wills showed how where the disk was located and how it is used to download data. Mr. Griggs explained again the procedures that occur when the flare shuts down. The pipeline containing the gas from the landfill is shutoff. The flare attempts to restart itself three times with propane gas. Wells #7 and #9 were inspected and found to be in-compliance.  <u>Facility-wide Conditions</u> No objectionable odors were detected. No visible emissions were observed. A Method 9 observation was not considered necessary. No areas were observed where reasonable precautions were not used to prevent unconfined particulate emissions.  Based on the site inspection and documentation provided, the facility was found to be in-compliance.			
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