Public Notice

Proposed Solid Waste Closure Permit Renewal for Florence Landfill

Comments due: 5 p.m., Dec. 16, 2019

Project location: Florence Landfill, 2840 Rhododendron Drive, Florence, Lane County

Proposal: The Oregon Department of Environmental Quality proposes to renew the solid waste closure permit for this site. The permit authorizes the operator of this site to continue to implement post-closure care activities in a manner that protects the environment in conformance with the permit and the DEQ-approved Closure Plan. The closed landfill is not open to the public and has not accepted solid waste since 1991. Lane County Public Works operates and maintains the facility.

Highlights: The facility is a closed municipal solid waste landfill. The current DEQ solid waste permit expires on Dec. 31, 2019. Current operations would not change under the proposed renewal.

A review of the DEQ solid waste permit file for the site indicates there were no compliance issues noted during the last permit cycle. The most recent compliance inspection was Oct. 4, 2019. The facility was in compliance with all its permit conditions at that time. DEQ did not receive any pollution complaints during the term of this permit.

How to comment: Send comments to DEQ Permit Coordinator, Denise Miller, at 165 E. Seventh Ave., Suite 100, Eugene, OR 97401 or miller.denise@deq.state.or.us.

Find more information: View the draft permit and permit evaluation electronically by scrolling down in this document or going to http://www.oregon.gov/deq/Get-Involved/Pages/Public-Notices.aspx. To request a copy be mailed to you, contact Denise Miller, DEQ permit coordinator, at 541-687-7465 or miller.denise@deq.state.or.us. For questions on the permit, contact James McCourt at 541-687-7438 or mccourt.james@deq.state.or.us.

If you want to review the application and related documents in person at the DEQ office at 165 E. Seventh Ave., Suite 100, Eugene, OR 97401, please contact Denise Miller, DEQ permit coordinator, at 541-687-7465 or miller.denise@deq.state.or.us, to set up an appointment.

The next step: DEQ considers and responds to all comments received and may modify the proposed permit based on comments.

Alternative formats: DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.
SOLID WASTE DISPOSAL SITE CLOSURE PERMIT:
Municipal Solid Waste Landfill – Closed

Issued in accordance with the provisions of Oregon Revised Statute Chapter 459; Oregon Administrative Rules 340, Divisions 90, 93, 94, 96 and 97; and subject to the Land Use Compatibility Statement referenced below.

Issued to:
Lane County Public Works
Waste Management Division
3100 E. 17 Ave.
Eugene, OR 97403
541-682-4516

Facility name and location:
Florence Landfill
2840 Rhododendron Drive
Florence, OR  97439
Sec. 22, T18S, R12W, W.M.
Lane County

Owner:
Lane County
3100 E. 17th Ave.
Eugene, OR  97403
541-682-4516

Operator:
Lane County Public Works
Waste Management Division
3100 E. 17th Avenue
Eugene, OR 97403
541-682-4516

ISSUED IN RESPONSE TO:
• Solid waste permit renewal application received July 10, 2019
• Land Use Compatibility Statement from the City of Florence dated April 29, 2010

The determination to issue this permit is based on findings and technical information included in the permit record.

ISSUED BY THE OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Brian Fuller, Manager
Western Region Materials Management
Permitting and Compliance

Permitted Activities

Until such time as this permit expires or is modified or revoked, the permittee is authorized to maintain a closed solid waste disposal site in conformance with the requirements, limitations, and conditions set forth in this document including all attachments.
TABLE OF CONTENTS

Introduction
This document is a solid waste permit issued by the Oregon Department of Environmental Quality in accordance with Oregon Revised Statutes 459 and Oregon Administrative Rules, Chapter 340.

In this document
This document contains the following sections:

<table>
<thead>
<tr>
<th>Section</th>
<th>Topic</th>
<th>See Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>Issuance</td>
<td>3</td>
</tr>
<tr>
<td>2.0</td>
<td>Disclaimers</td>
<td>4</td>
</tr>
<tr>
<td>3.0</td>
<td>Authority</td>
<td>4</td>
</tr>
<tr>
<td>4.0</td>
<td>Permit Modification</td>
<td>4</td>
</tr>
<tr>
<td>5.0</td>
<td>Authorizations</td>
<td>5</td>
</tr>
<tr>
<td>6.0</td>
<td>Prohibitions</td>
<td>5</td>
</tr>
<tr>
<td>7.0</td>
<td>Closure Construction and Maintenance</td>
<td>5</td>
</tr>
<tr>
<td>8.0</td>
<td>Facility Management</td>
<td>6</td>
</tr>
<tr>
<td>9.0</td>
<td>Financial Assurance</td>
<td>7</td>
</tr>
<tr>
<td>10.0</td>
<td>Environmental Sampling Requirements</td>
<td>7</td>
</tr>
<tr>
<td>11.0</td>
<td>Environmental Monitoring Standards</td>
<td>8</td>
</tr>
<tr>
<td>12.0</td>
<td>Recordkeeping and Reporting</td>
<td>8</td>
</tr>
<tr>
<td>13.0</td>
<td>Environmental Monitoring Network</td>
<td>9</td>
</tr>
<tr>
<td>14.0</td>
<td>Environmental Monitoring Plan</td>
<td>9</td>
</tr>
<tr>
<td>15.0</td>
<td>Summary of Due Dates</td>
<td>10</td>
</tr>
<tr>
<td>16.0</td>
<td>Attachments</td>
<td>12</td>
</tr>
<tr>
<td>16.0</td>
<td>Attachments</td>
<td>12</td>
</tr>
<tr>
<td>16.0</td>
<td>Attachment 1: Remedial Action Concentration Limits</td>
<td>12</td>
</tr>
</tbody>
</table>
PERMIT ADMINISTRATION

1.0 ISSUANCE

1.1 Permittee. The permit is issued to Lane County.

1.2 Permit Number: This permit will be referred to as Solid Waste Permit Number 91.

1.3 Permit Term. The issue date of this permit is the date this document is signed. The expiration of this permit is Nov. 30, 2029.

1.4 Facility Type. The facility is permitted as a closed municipal waste landfill.

1.5 Owner/Operator. The owner/operator of the facility is Lane County Public Works, Waste Management Division, 3100 E. 17th Ave., Eugene, Oregon.

1.6 Basis for Issuance. This permit is issued based upon the following documents submitted by the permittee:
   - Solid Waste Landfill Closure Permit Renewal Application received July 10, 2019
   - Land Use Compatibility Statement from the City of Florence dated April 29, 2010

1.7 Legal Control of Property. The permittee shall at all times maintain legal control of the disposal site property; including maintaining a current permit, contract or agreement that allows the operation of the facility if the site is not owned by the permittee.

1.8 Definitions. Unless otherwise specified, all terms are as defined in OAR 340-93-030.

1.9 Submittals and Notification Addresses: Unless otherwise specified, all submittals and notifications to DEQ under this permit must be sent to:

   Oregon Department of Environmental Quality
   Materials Management Program
   165 E. Seventh Ave., Suite 100
   Eugene, OR 97401-3049
   Telephone: 541-687-7465

All submittals to DEQ under Section 8.5 must be sent to:

   Oregon Department of Environmental Quality
   Materials Management Program
   700 NE Multnomah St., Suite 600
   Portland, OR 97232
   Telephone: 503-229-5409

All submittals must include, at a minimum, one paper copy and one electronic copy in a format that is approved by the DEQ project manager. Note that some submittals may require more paper copies. Therefore, the permittee must confirm with the permit manager how many copies are necessary prior to submittal of a document.

Note: Whenever possible, the permittee must submit two-sided paper copies of all reports. DEQ may accept electronic submittals for portions of some reports, as approved in the Environmental Monitoring Plan or by DEQ.
2.0 DISCLAIMERS

2.1 Property Rights. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights.

2.2 DEQ Liability. DEQ, its officers, agents or employees do not sustain any liability on account of the issuance of this permit or on account of the construction, maintenance or operation of facilities pursuant to this permit.

3.0 AUTHORITY

3.1 Ten-Year Permit. This permit may be issued for a maximum of ten years as authorized by Oregon Revised Statutes 459.245(2).

3.2 Documents Superseded. This document is the primary solid waste permit for the facility, superseding all other solid waste permits issued for the Florence Landfill by DEQ.

3.3 Permittee Responsibility and Liability. Conditions of this permit are binding upon the permittee. The permittee must conduct all facility activities in compliance with the provisions of this permit. The permittee is liable for all acts and omissions of the permittee’s contractors and agents in carrying out the operations and other responsibilities pursuant to this permit.

3.4 DEQ Access to Disposal Site. The permittee shall allow representatives of DEQ access to the disposal facility at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data and carrying out other necessary functions related to this permit.

Reference: OAR 340-093-0050(6)(e)

3.5 Other Compliance. Issuance of this permit does not relieve the permittee from the responsibility to comply with all other applicable federal, state or local laws or regulations. This includes the following solid waste requirements, as well as all updates or additions to these requirements:

- Solid Waste Closure Permit Renewal Application received July 10, 2019
- Oregon Revised Statutes, Chapters 459 and 459A
- Oregon Administrative Rules Chapter 340
- Any documents submitted by the permittee and approved by DEQ

3.6 Penalties. Violation of permit conditions will subject the permittee to civil penalties of up to $25,000 for each day of each violation.

Reference: OAR 340-093-0120 and ORS 459.995(1)(a)

4.0 PERMIT MODIFICATION

4.1 Five Year Review. Between the 3rd and 5th year of the life of the permit, DEQ may review the permit and determine whether or not the permit should be amended.

While not an exclusive list, the following factors will be used in making that determination:

- Compliance history of the facility
- Changes in operations at the facility
- Changes in state or federal rules which should be incorporated into the permit
- A significant release of leachate or landfill gas to the environment from the facility
- Significant changes to a DEQ-approved post-closure plan
- Other significant information or event
4.2 **Permit Modification.** At any time in the life of the permit, DEQ or the permittee may propose changes to the permit. Once approved by DEQ, any permit-required plans become part of the permit by reference. DEQ may provide notice and opportunity for review of permit-required plans.

4.3 **Modification and Revocation by DEQ.** DEQ may, at any time before the expiration date, modify, suspend or revoke this permit in whole or in part, in accordance with Oregon Revised Statutes 459.255, for reasons including but not limited to the following:

- Violation of any terms or conditions of this permit or any applicable statute, rule, standard or order of the Environmental Quality Commission
- Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts
- A significant change in the quantity or character of solid waste received or in the operation of the disposal site.

4.4 **Modification by Permittee.** The permittee must apply for a modification to this permit if there is a significant change in facility operations or a deviation from activities described in this document.

4.5 **Public Participation.** DEQ will issue a public notice to inform the public of any significant changes to the permit.

4.6 **Changes in Ownership.** At least 10 days in advance, the permittee must report to DEQ any change in the facility's ownership or the permittee's or operator's name and/or address.

Reference: OAR 340-093-0070(6)(a)(A)

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**CLOSURE CARE**

5.0 **AUTHORIZATIONS**

5.1 **Closure Care.** The permittee is authorized to provide post-closure care to the facility. The Final Engineered Post Closure Care Plan guides closure actions and is now part of the 2009 Environmental Monitoring and Post Closure Maintenance Plan and its approved amendments.

Reference: OAR 340-094-0115(3)(b) and 340-094-0130(1)

5.2 **Authorization of Activities:** All facility activities are to be conducted in accordance with the provisions of this permit. All plans required by this permit become part of the permit by reference once approved by DEQ. Any conditions of the approval are also incorporated into this permit unless contested by the permittee within 30 days of receipt of conditional approval.

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6.0 **PROHIBITIONS**

6.1 **Waste Receipt.** The Florence Landfill is closed to waste receipt. The permittee is prohibited from accepting solid waste for disposal.

6.2 **Open Burning:** The permittee must not conduct any open burning on the landfill cell.

Reference: OAR 340-094-0040(2)

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7.0 **CLOSURE CONSTRUCTION AND MAINTENANCE**

7.1 **Plan Compliance.** The permittee must maintain the disposal site in accordance with the approved Final Post-Closure Plan, and any amendments to the plan approved in writing by DEQ. This plan’s update was accomplished with the 2009 Environmental Monitoring and Post Closure Maintenance Plan and its approved amendments. This plan describes long term monitoring until Remedial Action Objective are met and the post closure care plans for this site. The current site uses include the adjacent Florence Transfer Station and its improvements.

Reference: OAR 340-094-0115 and 340-094-0130

7.2 **Vegetation.** The permittee must establish and maintain a dense, healthy growth of native vegetation on the closed landfill cells. This long term maintenance includes mowing the landfill cell areas annually to ensure the final cover system is maintained.

Reference: OAR 340-094-0115(3)(b)(E) and 0130(1)(b)(B)
7.3 **Surface Contour Maintenance.** The permittee must maintain the final surface contours of the landfill cover so that erosion and ponding of water is prevented to the maximum extent practicable. Erosion damage, cuts, must be repaired and seeded so that all waste remains covered.

The permittee must refill with soil, grade and seed all areas that have settled or where water ponds, and all areas where the cover soil has been damaged by cracking or erosion. Areas where vegetation has not been fully established must be fertilized, re-seeded and maintained.

Reference: OAR 340-094-0115(3)(b)(E) and 0130(1)(b)(A)

7.4 **Surface Water.** The permittee must divert surface water drainage around or away from the landfill at all times.

The permittee must maintain surface water diversion ditches or structures free of obstructions and debris at all times.

Reference: OAR 340-094-0115(3)(b)(E) and 0130(1)(b)(A)

7.5 **Leachate System.** The permittee must maintain the disposal site in a manner that deters leachate production to the maximum extent practical. The landfill has a three-foot sandy soil final cover system to minimize leachate production. The final cover system is being enhanced with chipped and decomposed green waste to promote vegetative cover. The 2012 Record of Decision for this site established Remedial Action Concentration Limits (RACLS) with no further post closure care actions beyond final cover system and buffer lands maintenance.

Reference: OAR 340-094-0115(3) and 0130(1)(b)

7.6 **Property Records.** The permittee must record the presence and location of the waste in the property records of Lane County, and submit a documented copy to DEQ. DEQ requires a deed notification within 90 days after the issuance of this permit to meet 40CFR258.60(i) and OAR 340-094-0130(1)(a) requirements.

8.0 **FACILITY MANAGEMENT**

8.1 **Discovery of Prohibited Waste.** If the permittee discovers prohibited waste, the permittee must notify DEQ within 24 hours and begin to isolate or remove the waste.

Within 60 days, the permittee must transport non-putrescible, non-hazardous prohibited waste to a disposal or recycling facility authorized to accept such waste, unless otherwise approved or restricted by DEQ.

8.2 **Spills Notification.** Oregon Revised Statute 466.635 and Solid Waste Rules, Chapter 340, Division 142 require immediate notification to Oregon Emergency Response System after taking any required emergency actions to protect human health and the environment when oil or hazardous materials are spilled. Immediately report spills to Oregon Emergency Response System at 1-800-452-0311 if the spill is of a reportable quantity. Reportable quantities include:

- Any amount of oil spilled to waters of the state
- Oil spills on land in excess of 42 gallons
- Two hundred pounds, 25 gallons or more of spilled pesticide residue
- Spills of hazardous materials that are equal to, or greater than, the quantity listed in the Code of Federal Regulations, 40 CFR Part 302 (List of Hazardous Substances and Reportable Quantities), and amendments adopted before July 1, 2002

For a complete list of hazardous materials required to be reported, please refer to OAR 340-142-0050.

8.3 **Inspection.** The permittee must physically inspect the entire disposal site at least quarterly to determine compliance with this permit and the rules of DEQ. The permittee must record any post-closure repairs performed. Inspection records must be made available to DEQ upon request.
8.4 Evaluation. Prior to Feb. 15 of each year, the permittee must conduct and submit to DEQ an evaluation of the facility’s status, including:

- A discussion of implementation of the post-closure plans
- A description of unanticipated occurrences and any changes to the post-closure plans
- The permittee will summarize the quarterly closed landfill site inspection or monthly site inspections of the closed landfill site results as part of the Annual Site Evaluation Report that is part of the annual environmental monitoring and post closure care maintenance reporting.

Reference: 340-094-0100(3)(a)

8.5 Fees. The permittee must pay the solid waste fee each year this permit is in effect. An invoice indicating the amount of the fee will be mailed prior to the date due. Reference: OAR 340-097-0110(4)(c) and 340-097-120(6)(d)

8.6 Access Control. The permittee must control public access to the facility as necessary to prevent unauthorized entry and dumping.

Reference: OAR 340-094-0040(9)

8.7 Fire Protection. The permittee shall make arrangements with the local fire control agency to immediately acquire their services when needed and shall provide adequate on-site fire protection as determined by the local fire control agency.

Fires must be immediately and thoroughly extinguished. The permittee shall be responsible for initiating and continuing appropriate firefighting methods until all smoldering, smoking and burning ceases.

Fires shall be reported to DEQ within 24 hours at: 541-687-7465.

Reference: OAR 340-094-0040(11)(g)

8.8 Future Use. Any use, activity or construction of buildings, structures or utilities on or within 200 feet of the waste footprint of this disposal site during the post-closure care period must have DEQ’s prior written approval and must be done in a manner that protects the integrity of the final cover system, landfill stability, gas monitoring devices, and surface water control systems.


9.0 FINANCIAL ASSURANCE

9.1 Financial Assurance Not Required. The permittee was exempted of financial assurance requirements by DEQ in the1991 Permit Evaluation Report. This exemption does not relieve the permittee from the responsibility of financing and completing post closure maintenance of the site in accordance with the approved Environmental Monitoring and/or Post Closure Maintenance Plans or any subsequent plan modifications in the term of this permit.

10.0 ENVIRONMENTAL MONITORING

10.1 Notification. The permittee must notify DEQ in writing or email of all upcoming sampling events at least ten working days prior to the scheduled date of the sampling event at the following address:
10.2 **Split Sampling.** The permittee must split samples with DEQ when requested, and must schedule all requested split-sampling events with DEQ’s laboratory at least forty-five (45) days prior to the sampling event. The permittee must conduct split sampling events with DEQ in accordance with the schedule presented in the most recently approved Environmental Monitoring Plan.

10.3 **Monitoring Schedule.** The permittee must refer to the approved Environmental Monitoring Plan for environmental monitoring procedures.

10.4 **Changes in sampling or split sampling.** DEQ reserves the right to add to or delete from the list of scheduled sampling events, sample locations, parameters to be sampled for, and to conduct unscheduled samplings or split sampling. In the event of changes to the split sampling schedule, DEQ will make every effort to notify the permittee of the changes at least 30 days prior to the split sampling event.

10.5 **Split Sampling Events.** The permittee must split samples with DEQ when requested, and must schedule all requested split-sampling events with the DEQ laboratory at least forty-five (45) days prior to the sampling event.

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11.0 **ENVIRONMENTAL MONITORING STANDARDS**

11.1 **Rules.** The permittee must not allow the release of any substance from the landfill into water media which will result in a violation of any applicable federal or state surface water, groundwater or drinking water rules or regulations beyond the solid waste boundary of the disposal site or an alternative boundary specified by DEQ.

11.2 **Review of Results.** The permittee must review the analytical results after each monitoring event according to the protocols established in the most currently approved site-specific Environmental Monitoring Plan.

11.3 **Resampling Results.** Upon receipt of data from resampling, the permittee must review the analytical results according to the protocols established in the most currently approved site-specific Environmental Monitoring Plan.

11.4 **Certified Environmental Laboratory Data.** DEQ suggests the use of only environmental sampling data analyzed by an Oregon Laboratory Accredited Program (ORLAP) lab or a National Volunteer Laboratory Accreditation Program (NVLAP) lab. Use of an ORLAP or NVLAP approved lab will aid you and DEQ in Environmental Monitoring Plan and Annual Environmental Monitoring Report preparation and review.

12.0 **RECORDKEEPING AND REPORTING – ENVIRONMENTAL MONITORING**

12.1 **Annual Environmental Monitoring Report (AEMR).** Prior to June 30th of each year for the duration of this permit, the permittee must submit to DEQ two copies (one hard copy and one electronic copy) of an annual monitoring report covering the year. The report must be prepared in accordance with the approved format and stamped by an Oregon Registered Geologist or an Oregon Registered Engineering Geologist and must follow the format approved in the Environmental Monitoring Plan.

*Note:* Whenever possible, the permittee must submit two-sided copies of all reports.
12.2 **Statement of Compliance.** A short (approximately one-page) cover letter must accompany the Annual Environmental Monitoring Report that:

- Compares the analytical results with the relevant monitoring standards
- States whether or not federal or state standards were exceeded for the relevant media
- States whether or not a significant change in water quality occurred

The cover letter must be signed by a person familiar with this site and that has experience in hydrogeological investigations at solid waste facilities.

12.3 **Annual Monitoring Report Contents.** The Annual Environmental Monitoring Report must reflect the facility’s current condition, present accurate data that corresponds with the original field and laboratory data, and include the elements presented in the most recently approved Environmental Monitoring Plan.

12.4 **Submittal Address.** Except where otherwise noted, all submittals to DEQ under this section must be sent to the Eugene office address as provided in Section 1.9.

12.5 **Split Sampling Submittal.** Within 90 days of any split sampling event, the permittee must submit the following information from the split sampling event to DEQ’s laboratory:

- A copy of all information pertinent to the sample collection handling, transport and storage, including field notes
- Copies of all laboratory analytical reports
- Copies of all laboratory QA/QC reports
- Any other data or reports requested by DEQ

12.6 **Lab Address.** All split sampling reporting must be sent to the lab address found above.

12.7 **DEQ Response to Split Sampling.** If requested by the permittee in writing and after the permittee has submitted all split sampling data information, DEQ’s lab may send the permittee a copy of:

- DEQ’s analysis of the split sample
- QA/QC report
- Analytical report
- Field data sheet

### 13.0 ENVIRONMENTAL MONITORING NETWORK

13.1 **Damage Reporting.** Any damage to a monitoring device must be reported to DEQ in writing within 14 days of the discovery, along with a description of proposed repair or replacement measures and a time schedule for completion of this work.

13.2 **Access to Monitoring Device.** The permittee must maintain reasonable all-weather access to all monitoring devices and/or locations in order to facilitate sample collection and/or inspection

### 14.0 ENVIRONMENTAL MONITORING PLAN

14.1 **Environmental Monitoring Plan Submittal.** If requested in writing by DEQ or submitted by the permittee based on justified long term monitoring reductions, the permittee must submit, for approval, two copies (one hard copy and one electronic copy) of an updated Environmental Monitoring Plan to DEQ. The plan must be prepared and stamped by an Oregon Registered Geologist or an Oregon Registered Engineering Geologist. Upon approval, this plan is incorporated into this permit by reference including all conditions of the approval.

**Note:** Whenever possible, the permittee must submit two-sided copies of all reports

Reference: OAR 340-095-0040(2)
14.2 **Environmental Monitoring Plan Contents.**

The Environmental Monitoring Plan must include plans implementing an environmental monitoring program that will characterize potential facility impacts. This plan may consist of the previous approved SAPs (Sampling and Analysis Plans) with any changes or additions since that time (i.e., approved permit-specific concentration limits, new wells, etc.)

Reference: The *Solid Waste Landfill Guidance, September 1996,* provides information on applicable elements of what DEQ considers an acceptable Environmental Monitoring Plan. Following the organizational format provided in the Guidance will expedite DEQ’s review of the plan.

14.3 **EMP Maintenance.** The permittee must revise the EMP as necessary to keep it current and reflective of current facility conditions, procedures, and sampling requirements or changes. The permittee must submit all Environmental Monitoring Plan revisions to DEQ for approval.

14.4 **EMP Compliance.** The permittee must conduct all environmental monitoring at the facility in accordance with the approved EMP, including any conditions of approval, amendments and updates.

14.5 **Additional Monitoring Points.** Any new or replacement monitoring point or device established during the time frame of this permit must be incorporated into the environmental monitoring plan. The updated plan must be resubmitted to DEQ for approval.

14.6 **Submittal Address.** Send all required submittals under this section to:

   Oregon Department of Environmental Quality
   Materials Management Program
   165 E. Seventh Ave., Suite 100
   Eugene, OR 97401-3049
   Telephone: 541-687-7465

### COMPLIANCE SCHEDULE

**15.0 SUMMARY OF DUE DATES**

15.1 **Summary.** The permittee must comply with the event-driven schedule shown below. This compliance schedule does not apply to many of the routine reporting requirements specified in other sections of the permit.

<table>
<thead>
<tr>
<th>Due Date</th>
<th>Activity</th>
<th>See section...</th>
</tr>
</thead>
<tbody>
<tr>
<td>Within 10 days of ownership or</td>
<td>Notify DEQ</td>
<td>4.6 Changes in ownership or address</td>
</tr>
<tr>
<td>operator change</td>
<td></td>
<td></td>
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<tr>
<td>As needed</td>
<td>Review the 2009 Environmental Monitoring and Post Closure Maintenance Plan</td>
<td>7.1 Plan compliance</td>
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<tr>
<td></td>
<td>for changes to long term monitoring and its approved amendments</td>
<td></td>
</tr>
<tr>
<td>Within 90 days of permit issuance</td>
<td>Deed Notification made with Lane County Deeds and records for this site</td>
<td>7.6 Property records</td>
</tr>
<tr>
<td>Immediately</td>
<td>OERS notification of reportable spill</td>
<td>8.2 Spills notification</td>
</tr>
<tr>
<td>Within 24 hours of fire</td>
<td>Notify DEQ, immediately and thoroughly extinguish fire</td>
<td>8.7 Fire protection and reporting</td>
</tr>
<tr>
<td>Event Description</td>
<td>Action Description</td>
<td>Section</td>
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<td>----------------------------------------------------------------------------------</td>
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<tr>
<td>Within 24 hours of discovery of prohibited waste</td>
<td>Notify DEQ of prohibited waste, begin to isolate and remove, take digital photos</td>
<td>8.1</td>
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<tr>
<td>Within 60 days of discovery of prohibited waste</td>
<td>Transport prohibited waste to authorized facility</td>
<td>8.1</td>
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<tr>
<td>At least quarterly</td>
<td>Physically inspect entire disposal site.</td>
<td>8.3</td>
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<tr>
<td>By Feb. 15 of each year</td>
<td>Submit an annual site evaluation report</td>
<td>8.4</td>
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<tr>
<td>By June 30 of each year</td>
<td>Submit an annual environmental monitoring report</td>
<td>12.1</td>
</tr>
<tr>
<td>If requested by DEQ or permittee requests changes to long term monitoring</td>
<td>Submit updated Environmental Monitoring Plan (EMP) if requested by DEQ for changes to long term monitoring</td>
<td>14.1</td>
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<tr>
<td>At least 10 working days prior to scheduled sampling event</td>
<td>Notify DEQ</td>
<td>10.1</td>
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<tr>
<td>At least 45 days prior to split sampling event</td>
<td>Schedule split sampling event with DEQ laboratory</td>
<td>10.5</td>
</tr>
<tr>
<td>Within 90 days of split sampling event</td>
<td>Submit required data/documents to DEQ laboratory</td>
<td>12.5</td>
</tr>
<tr>
<td>Within 14 days of discovery of monitoring well damage reporting</td>
<td>Notify DEQ</td>
<td>13.1</td>
</tr>
</tbody>
</table>
16.0        ATTACHMENTS

Attachments to the permit include:

<table>
<thead>
<tr>
<th>Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Remedial Action Concentration Limits</td>
</tr>
</tbody>
</table>

ATTACHMENT 1: REMEDIAL ACTION CONCENTRATION LIMITS

As listed in the site DEQ-approved Environmental Monitoring Plan, Remedial Action Concentration Limits for groundwater are established as follows:

<table>
<thead>
<tr>
<th>Compound</th>
<th>Remedial Action Concentration Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Volatile Organic Compounds (µg/L)</strong></td>
<td></td>
</tr>
<tr>
<td>Benzene</td>
<td>130</td>
</tr>
<tr>
<td>Chlorobenzene</td>
<td>50</td>
</tr>
<tr>
<td>Chloroethane</td>
<td>670</td>
</tr>
<tr>
<td>1,4-Dichlorobenzene (1,4-DCB)</td>
<td>15</td>
</tr>
<tr>
<td>Methyl Chloride</td>
<td>2,200</td>
</tr>
<tr>
<td>Napthalene</td>
<td>620</td>
</tr>
<tr>
<td>1,2,4 Trimethylbenzene</td>
<td>1,300</td>
</tr>
<tr>
<td>m,p-Xylenes</td>
<td>1.8</td>
</tr>
<tr>
<td><strong>Dissolved Metals (mg/L)</strong></td>
<td></td>
</tr>
<tr>
<td>Barium</td>
<td>5.0</td>
</tr>
<tr>
<td>Manganese</td>
<td>1.2</td>
</tr>
<tr>
<td>Copper</td>
<td>0.0031</td>
</tr>
<tr>
<td><strong>Inorganic Compounds (mg/L)</strong></td>
<td></td>
</tr>
<tr>
<td>Total Ammonia</td>
<td>11.5</td>
</tr>
<tr>
<td>Nitrate (NO₃/NO₂)</td>
<td>900</td>
</tr>
</tbody>
</table>
Evaluation and Overview
Florence Landfill– Permit #91
Oregon Department of Environmental Quality
Western Region - Eugene Office
165 E. Seventh Ave, Suite 100
Eugene, OR 97401

Oct. 8, 2019
Contact: James McCourt, 541-687-7438, mccourt.james@deq.state.or.us

Proposed Permit
The Department of Environmental Quality proposes to renew a solid waste closure permit for this closed municipal solid waste landfill.

The Florence Landfill is located at 2840 Rhododendron Drive, northwest of the city center of Florence, along the Siuslaw River, approximately 2.5 miles upstream of the mouth with the Pacific Ocean. The legal description of the site is Section 22, Township 18S, Range 12W, W.M. The site is bounded to the west by Rhododendron Drive and the Siuslaw River, to the east by open space dune sand and a small airfield, to the north by open space, and to the south by Greentrees Subdivision, a private mobile home park with controlled access.

The current DEQ solid waste permit for this facility was issued Dec. 21, 2010 and expires on Dec. 31, 2019. The permit is administratively extended until action is taken on the proposed renewal application due to the timely submission of the renewal permit application.

Permit Writer
James McCourt
Western Region –Eugene Office
541-687-7438
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Permit Category
Solid waste disposal site –Municipal Solid Waste Landfill Site Closure Permit

Activities Covered Under this Permit
This permit authorizes the permittee to implement closure and post-closure activities per OAR 340-094-0100 and the site-specific DEQ-approved closure and post-closure plan with limitations as defined in the permit.

Activities Not Covered Under the Permit
This site is closed and the permittee is prohibited from accepting any solid waste for disposal. Open burning is also prohibited.

Source Location
Florence Landfill
Sec. 22, T18S, R12W, W.M.
Lane County

Coverage and Eligibility
The permit is effective on the date it is signed by DEQ and is proposed to expire on Nov. 30, 2029. The permit is issued in accordance with the provisions of Oregon Revised Statutes Chapter 459; Oregon Administrative Rules 340 Divisions 93, 94 and 97 and subject to Special-Use Permit 1208-01 from 1996.
Introduction: What is DEQ Proposing?
DEQ is proposing to renew a Solid Waste Disposal Site Closure Permit for the closed Florence Landfill. The permit renewal application was received on July 10, 2019 and DEQ determined that the application was complete.

The permit allows the permittee to continue to implement closure and post-closure activities at the disposal site in conformance with the requirements of the permit and DEQ-approved closure plan that requires closure and post-closure activities at the disposal site be implemented in a manner that protects the environment.

The permit prohibits acceptance of any waste materials for disposal in the landfill. The permit also prohibits open burning at the closed disposal site.

Regulatory Context
Oregon Revised Statutes Chapter 459 requires a DEQ permit for any solid waste disposal site. OAR Chapter 340 Divisions 93-97 provides further clarification of requirements for permitted facilities.

Permit History
The Florence Landfill has operated under an Oregon DEQ solid waste disposal permit since 1973. Site records show that the waste stream was predominantly household-generated solid waste. A limited amount of woodwaste from commercial sources was also received and used as intermediate cover. Septage and sewage sludge was also disposed of at this site in the mid-1980s. The total estimated waste fill volume in the landfill is between 200,000 and 270,000 cubic yards.

The site is set in an area of sand dunes that lie on top of siltstone and claystone formations. Waste was placed as fill in low spots within the dunes or in areas where sand dunes had been excavated. Waste fill, estimated to be between 15 and 27 feet thick, was placed above the groundwater table. During site closure in 1992, the landfill was covered with a 3-foot thick layer of sand and some areas also received a layer of finer soils and organic material to promote vegetation growth. Starting in 2006, areas of the landfill cap, that had thin cover soil or poorer vegetative growth were re-covered with green waste/mulch and re-seeded. The use of this organic cover material enhances the growth of vegetation in these select areas.

Contaminants present in waste fill have been mobilized by rainwater percolating through the waste and transporting them to the underlying groundwater. Contaminants include inorganic compounds (e.g., ammonia and nitrate) and dissolved metals, with lower concentrations of trace metals and volatile organic compounds (VOCs). These compounds are transported with groundwater flow where they discharge to the saline-brackish water of the Siuslaw River. It is unlikely that groundwater in the site area would be used for any purpose (drinking, industrial, or commercial) since water is supplied by the City of Florence municipal water supply. Concerns for these concentration levels in the 1996 Environmental Monitoring Report led to a Remedial Investigation/Feasibility Study for this site that led to a Recod of Decision in 2012. Remedial Action Concentration Limits were established for this site. The groundwater monitoring shows stable to improving water quality with the closure of this site similar to the predictions from the RI/FS work for this site.

Currently, Lane County operates a solid waste transfer station on the landfill property (off of and north of the landfill footprint).

Site surface water is directed off the site via grading, vegetative cover and perimeter drainages. The cover soils and vegetation over the cells are in good condition and promote drainage off the cell while minimizing infiltration.
The Permit Administration Section describes parameters surrounding the issuance of the permit, Disclaimer information for DEQ, DEQ authority and information about modification of the permit.

The Closure Care Section describes activities the permit authorizes and prohibits, closure construction and maintenance requirements, facility management requirements, financial assurance requirements were not required since issuance of the 1991 permit evaluation and environmental monitoring requirements per the current Environmental Monitoring Plan.

The Compliance Schedule includes a summary of due dates that typically include the recurring tasks of Annual Environmental Monitoring Report and Annual Site Evaluation Report.

Lane County Waste Management Division has submitted a complete application for renewal of a Solid Waste Disposal Site Closure Permit for the Florence Landfill received July 10, 2019. The current Solid Waste Disposal Site Permit expires on Dec. 31, 2019.

**Compliance History**

Since the most recent solid waste permit was issued for the Florence Landfill on Dec. 21 2010, there have been no Notices of Non-Compliance issued. The site continues to see improvements in the surrounding water quality and no landfill gas migration issues. A site investigation was conducted and completed to assess groundwater impacts caused by the landfill. Groundwater monitoring conducted in 1996 under the solid waste permit found elevated levels of landfill-related chemicals, primarily non-hazardous chemicals such as manganese and nitrate, in site groundwater monitoring wells. A remedy, as presented in a DEQ 2012 Record of Decision (ROD), was developed to address these groundwater impacts. The remedy is to continue implementing the presumptive remedy for landfills (e.g., maintain the cover, stormwater management, access control, and groundwater and landfill gas monitoring). The human health and environmental endangerment assessment found that the site does not pose a risk to human receptors and to the Siuslaw River estuary system.

This closed landfill cell site is currently on a two-year inspection cycle.

**DEQ’s Recommendation Regarding the Permit Renewal**

Based on a review of all issues and site visits, I recommend the draft permit be placed on public notice for comment.