

Cheryan, George

From: Helle, Deborah
Sent: Tuesday, June 21, 2005 9:07 AM
To: Cheryan, George
Subject: ZOD Paragraph for Buttrey

Specific Condition 2. Zone of Discharge: The zone of discharge for the facility shall be a three dimensional volume, defined in the horizontal plane as extending 100 feet from the edge of the solid waste deposit, or to the property boundary, whichever is less, as depicted in Attachment B of the MPIS (Exhibit II) of this permit, and defined in the vertical plane as extending from the top of the ground to the base of the surficial aquifer, (water table aquifer) as depicted on Exhibit 1 of this permit. Class G-II water quality standards must be met at the boundary of the zone of discharge in accordance with Rule 62-522.410, F.A.C.

Deborah B. Helle, P.G.

Florida Department of
Environmental Protection
Central District
3319 Maguire Blvd
Orlando, FL 32803
407-893-3320

BUTTREY DEVELOPMENT FOUR, L.L.C.

May 4, 2005

Mr. James Bradner, P.E.
Program Manager Solid and Hazardous Waste
Central District
3319 Maguire Blvd., Ste. 232
Orlando, Florida 32803-3767

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Central Dist. - DEP

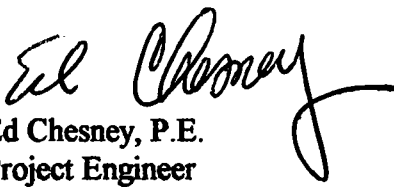
Subject: Request for Additional Information
Keene Road Disposal/Buttrey Development
Application Nos. SC48-0165969-008 & SO48-0165969-009

Dear Mr. Bradner

The following discussion is intended to satisfy the request for additional information dated September 16, 2004. All of the comments have been addressed to the best of my understanding and interpretation of intent. Also included along with this response are the requested copies.

If you have any questions concerning these responses or need clarification or additional information please feel free to contact me at 407-296-0016.

Sincerely,


Ed Chesney, P.E.
Project Engineer

Cc: John Buttrey, Buttrey Development Four, LLC

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1. The application for the Buttrey Development Four site is proposed as a modification to the Department permits now held by Waste Management, Inc. of Florida, for the sites known as Buttrey Development Two and Buttrey Development Three. Accordingly, the permittee name on this application must be **Waste Management, Inc. of Florida**, although Buttrey Development may act as the agent for Waste Management, Inc. of Florida. If you wish Buttrey Development to be the permittee, this project cannot be considered as a permit modification, and must be submitted as a new project. Note that the financial assurance mechanism must be established in the name of the permittee as it appears on the permit.

Response: Attached is authorization from Waste Management Inc. of Florida to change the permittee name on the application to Waste Management, Inc. of Florida and allow Buttrey Development to act as its agent.

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BUTTREY DEVELOPMENT FOUR, LLC

April 25, 2005

RECEIVED
MAY 4 2005
Central Dist. - DEP

Mr. James N. Bradner, P.E.
Program Manager, Solid and Hazardous Waste
Florida Department of Environmental Protection
Central District
3319 Maguire Blvd., St. 232
Orlando, Fl. 32803-3767

Subject: Keene Road Disposal/Buttrey Development, Class III Landfill Expansion
Modification of Permit Nos. SC48-0164969-008 & SO48-0165969-009

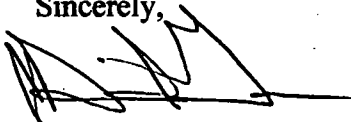
Dear Mr. Bradner:

WASTE MANAGEMENT, Inc. OF FLORIDA has a Contract to purchase Buttrey Development Four, LLC from its current owners, once all permits are received. We followed this same procedure in purchasing Buttrey Development Two, LLC, and Buttrey Development Three, LLC.

As requested in your letter of September 16, 2004 (copy attached), we agree to changing the permittee name on the current application to WASTE MANAGEMENT, Inc. OF FLORIDA. We also authorize Buttrey Development Four, LLC, its Officers and Agents (Ed Chesney, P.E. or John Buttrey) to act as agents for WASTE MANAGEMENT, Inc., OF FLORIDA in this application.

If you have any further questions, don't hesitate to contact either myself (407-788-0800), John Buttrey (407-463-2103) or Ed Chesney (407-296-0016).

Sincerely,



David Green
Market Area Vice President
Waste Management, Inc. OF FLORIDA

Att.

Cc: John Buttrey
Ed Chesney

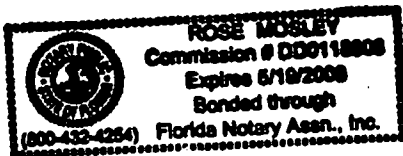
6239 EDGEWATER DR., ORLANDO, FL. 32810
PHONE 407-296-0016, FAX 407-294-8090

Page 2
April 25, 2005

State of Florida
County of Orange

The foregoing was acknowledged before me this 26th day of April 25, 2005

Rose Mosley
Notary Public





Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

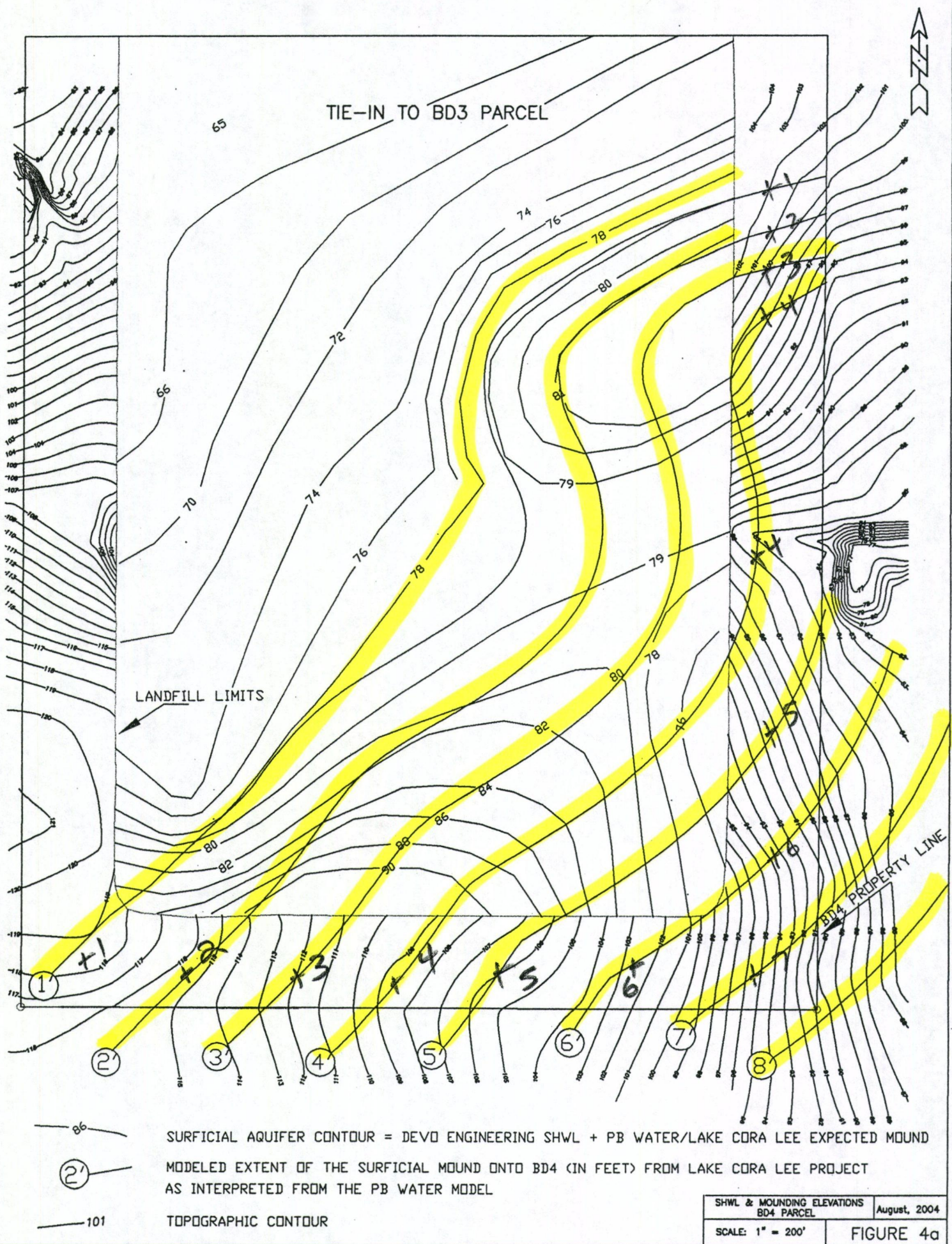
Colleen Castille
Secretary

MEETING ATTENDANCE RECORD

Purpose: Buttrey Landfill

Date: 05/04/05

| Name | Affiliation | 10 Digit Phone No. | E-Mail Address |
|------------------|-------------------------------------|--------------------|--|
| Deborah Helle | FDEP | 407-893-3320 | deborah.helle@dep.state.fl.us |
| Jim Bradner | FDEP | 407-893-3329 | James.Bradner@floridadep.net |
| GEORGE CHERYAN | FDEP | 407-893-3328 | |
| DEBRA LAISURE | FOEP | 407-893-7874 | Debra.Laisure@floridadep.net |
| Leonardo Anglero | FDEP | 407. 893. 3312 | leo.anglero@floridadep.net |
| ED CHESNEY | Buttrey Dev. Four, LLC (BOY LLC) | 407-296-0016 | bishopbuttrey@cfl.tr.com |
| DEVO SEEREE RAM | DEVO ENGR | 407-290-2371 | dsw@devseng.com |
| John Buttrey | BOY LLC | 407-463-2103 | jbuttreydevLLC@AOL.Com |
| | | | |
| | | | |



Buttrey Development Four, L.L.C.

November 2, 2004

Mr. James Bradner, P.E.
FDEP Solid Waste
Central District
3319 Maguire Blvd., Ste. 232
Orlando, Florida 32803-3767

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Central Dist. - DEP

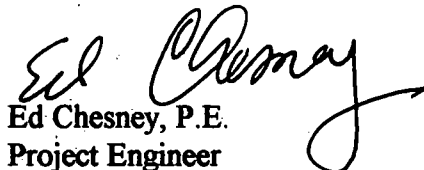
Subject: Request for Extension
Permit Application Nos. SC48-0165969-008 & SO48-0165969-009

Dear Mr. Bradner:

Please accept this as our request for a thirty day extension concerning the additional information letter dated September 16, 2004. We are working with Waste Management Inc. of Florida on this matter and hope to have the necessary paper work from their Corporate Office in the near future.

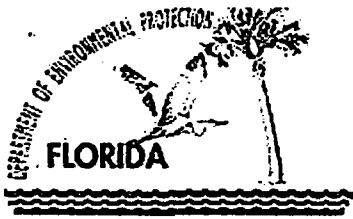
Please feel free to call on me at 407-296-0016 if you have any questions.

Sincerely,


Ed Chesney, P.E.
Project Engineer

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P.O. Box 1029 Clarcona, Florida 32710
Telephone: (407) 296-0016; FAX: (407) 294-8090



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3787

Colleen Castille
Secretary

By E-Mail
bishopbuttrey@cfl.rr.com

Mr. John Buttrey
Buttrey Development Four, LLC
6239 Edgewater Drive, Suite D-1
Orlando, FL 32810

OCD-SW-04-0306

Orange County - SW
Keene Road Disposal/Buttrey Development,
Class III Landfill Expansion - Construct & Operate
Modification of Permit Nos. SC48-0165969-001 & SO48-0165969-002
Permit Application Nos. SC48-0165969-008 & SO48-0165969-009

Dear Mr. Buttrey:

The additional information received on August 17, 2004, was reviewed, however, the items on the attached sheet remain incomplete. Evaluation of your application will continue to be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within **30 days** of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact me at (407) 893-3328.

Sincerely,

James N. Bradner, P.E.
Program Manager
Solid and Hazardous Waste

Date: September 16, 2004

JNB/gc/ew
Enclosure



cc: Ed Chesney, P.E. - bishopbuttrey@cfl.rr.com
Charles J. Campagna, Waste Management, Inc. of Florida
ccampagna@wm.com

1. The application for the Buttrey Development Four site is proposed as a modification to the Department permits now held by Waste Management, Inc. of Florida, for the sites known as Buttrey Development Two and Buttrey Development Three . Accordingly, the permittee name on this application must be **Waste Management, Inc. of Florida**, although Buttrey Development may act as the agent for Waste Management, Inc. of Florida. If you wish Buttrey Development to be the permittee, this project cannot be considered as a permit modification, and must be submitted as a new project. Note that the financial assurance mechanism must be established in the name of the permittee as it appears on the permit.

Florida Department Of
Memorandum

Environmental Protection

CENTRAL DISTRICT

TO: George Cheryan
THROUGH: Jim Bradner, P.E. 
FROM: Deborah Helle, P.G. 
DATE: August 25, 2004
SUBJECT: Keene Road Buttrey 4 RAI Response Review

I have reviewed the referenced document. The concerns about the seasonal high water table and the base elevation have been adequately addressed.

BUTTREY DEVELOPMENT FOUR, L.L.C.

August 17, 2004

Mr. James Bradner, P.E.
Program Manager Solid and Hazardous Waste
Central District
3319 Maguire Blvd., Ste. 232
Orlando, Florida 32803-3767

RECEIVED
AUG 17 2004
Central Dist. - DEP

Subject: Request for Additional Information
Keene Road Disposal/Buttrey Development
Application Nos. SC48-0165969-008 & SO48-0165969-009

Dear Mr. Bradner

The following discussion is intended to satisfy the request for additional information dated July 14, 2004. All of the comments have been addressed to the best of my understanding and interpretation of intent. Also included along with this response are the requested copies.

If you have any questions concerning these responses or need clarification or additional information please feel free to contact me at 407-296-0016.

Sincerely,



Ed Chesney, P.E.
Project Engineer

Cc: John Buttrey, Buttrey Development Four, LLC

C:\Documents and Settings\Ed Chesney\My Documents\MyFiles\pit151application\FDEP_RTC1.doc

1. The applicant is required to notify the local government having jurisdiction over the facility of the filing of the permit application before or on the same day of filing the application with the Department. Submit proof to the Department that the local government was notified.

Response: Attached as Exhibit A is a copy of the cover letter submitted to the City of Apopka on the same day as application to the FDEP was made.

2. For item A-3, page 4, DEP Form # 62-701.900(1), insert a check mark against "New", delete the check mark against "Substantial Modification" and submit the revised page. The application cannot be treated as an application for modification because the current permittee for the sites BD Two and BD Three, LLC is different from the applicant for the new expansion site, BD Four, LLC.

Response: Attached as Exhibit B are owner authorization forms which allow BD Four to act as agents for Waste Management, Inc. of Florida with regards to this application and modifications to their existing BD Two and BD Three sites.

3. Item A-13 on page 5 of 40, DEP Form #62-701.900(1) refers to construction of the new site and not closure completion. Submit the revised page with the appropriate information.

Response: Attached as Exhibit C a revised page 5 of 40.

4. Page 5 of the Operations Plan states that the disposal area is approximately 102 acres. Items B-1 and B-3 on page 6 of 40, DEP Form # 62-701.900(1), indicate the disposal area to be approximately 100 acres. Please submit the revised page of the Operations Plan with the correct acreage for the disposal area, so both documents will be consistent.

Response: Attached as Exhibit D is a revised page 6 of 40. The corrected disposal area is 102 acres as stated on Page 5 of the Operations Plan.

5. The recycling activities on page 14 & 15 of the report indicate that the facility needs a Waste Processing Facility permit to cover the recycling activities. Submit an Application to Construct, Operate, or Modify a Waste Processing Facility, effective 5-27-01 with an application fee of \$2,000.

Response: It is not the intent of this application to acquire a Waste Processing Facility permit. The references on pages 14 & 15 of the Operations Plan intended to refer to the removal, and temporary storage for offsite recycling. The only processing if any would involve clean yard waste to augment intermediate cover. Should processing of recycled materials be desired in the future, all necessary permits will be applied for at that time. Attached as Exhibit E, is a revised page 15 from the Operations Plan, which removes the word processing from subheading 1.4.5.2.

6. The Training Plan on pages 41 and 42 of the report does not indicate that the facility has an adequate number of trained spotters and operators, proof of their most recent training, list of courses for operators and spotters, and a schedule for future training to ensure that the facility meets the requirements of Rule 62-701.320(15), F.A.C. Submit a Training Plan that shall include but not limited to:

- A list and schedule of all classes to be attended by operator(s) and spotter(s).
- List of operators and spotters scheduled for training.
- A mechanism for providing documentation of training.
- All training courses, whether public or in-house, shall be approved by the Department in accordance with Section 403.716, F.S. Any in-house operator-training program, which includes an examination required by this subsection, must be administered by an independent third party.
- Any other in-house operator-training program must be administered by a trained operator. The Training Plan, along with records documenting how the training plan is being implemented, shall be kept at the facility at all times and be made available for inspection by Department staff.

Response: This facility is expected to utilize the same personnel (operators and spotters) currently certified and working at the active Waste Management, Inc. of Florida site on the north side of Keene Road. Attached as Exhibit F are transcripts for these operators and spotters providing their latest training and expiration dates. Each employee or manager is automatically notified when updated training is required. This is monitored by both WMI and the University of Florida Continuing Education – TREEO Department. Once training and updates have been completed, each is issued a certification which can be sent to the FDEP as evidence of compliance with Section 403.716, F.S.

7. Page 48, Section 1.20.2 of the report, references a map which has not been received. Submit the map or provide the revised page with the appropriate reference.

Response: Attached as Exhibit G is the map referenced on page 48, Section 1.20.2.

8. Page 48, Section 1.21 of the report, references the Final Grade Plan to Sheet 6 of the construction plans. The construction plan only has 5 sheets. Submit the revised page with the appropriate reference for the Final Grade Plan.

Response: Attached as Exhibit H is a revised page 48 with the corrected sheet reference.

9. Page 1, Section 1.2 of the Engineering Report, requests modification of BD3 parcel from a 60-foot high rise to a 50-foot high rise. Waste Management, Inc. of Florida, the current permittee, must apply separately for any modification to the permit for the BD3 parcel.

Response: Please refer back to Exhibit B which contains owner's authorization to modify the BD3 parcel in conjunction with the BD4 application.

10. Exhibit A in the report is not signed and sealed by a professional engineer licensed in Florida. Submit Exhibit A, signed and sealed by a professional engineer licensed in Florida.

Response: Attached as Exhibit I is a signed and sealed copy of the Exhibit A previously submitted in Section II of the Engineering Report.

11. Provide information to indicate that none of the wells in Exhibit A are in violation of the prohibitions of Rule 62-701.300, F.A.C.

Response: Each of the wells shown on Exhibit A (Section II – Engineering Report) were either located in the field via area reconnaissance or through a SJRWMD well search (refer to Section II, Table 2 of the application). It is our opinion that each potable or agricultural well identified on Exhibit A are not in violation of Rule 62-701.300, F.A.C. In addition, a recent Phase I Environmental study was performed on the BD4 parcel (attached as Exhibit J) which did not discover any wells in violation during its research.

12. The Water Table Estimates & Proposed Base Grade Elevations report does not incorporate any anticipated mounding impact resulting from the Lake Cora Lee wetland treatment system to the east of BD4, and the proposed rapid infiltration basins (RIBs) south of BD4. The boundaries of these proposed projects are within 0-100 feet of BD4 and must be taken into account as part of the permit application review process. Submit a map showing the projected surficial ground water aquifer contours with the proposed Lake Cora Lee and RIBs impacts. The map should be the same scale as Figure 4, Base Grade Elevations BD4 Parcel, so that they may be compared.

Response: The previously submitted Figure 4 was developed based on a number of contributing factors. 1.) The latest design report (August 2003) prepared by PB Water for the Orange County Utilities Northwest Water Reclamation Facility Reclaimed Water System Expansion, “Rapid Infiltration Basin and Lake Cora Lee Wetland/Augmentation System”. 2.) Devo Engineering Water Table Estimates & Proposed Base Grade Elevations Report dated February 10, 2004. 3.) FDEP ERP Permit Modification (48-187635-003) dated April 27, 2004.

Attached as Exhibit K are three Figures (Figures 4.6, 4.10, & 4.13) all submitted as part of the above referenced PB Water Report. These figures depict the expected surficial aquifer mound as a result of the Lake Cora Lee & RIB expansion project under three different scenarios. The three Figures compare several different operating conditions for the Orange County Utilities (OCU) NWWRF, and their nearby Northwest Service Area (NWSA) municipal well field. The BD4 site has been highlighted in yellow for reference.

Figure 4.6 (Simulation 1) depicts the NWWRF operating at fully permitted capacity and the nearby NWSA well field operating at its 1995 withdrawals volumes.

Figure 4.10 (Simulation 2) depicts the NWWRF operating at fully permitted capacity and the nearby NWSA well field operating at its permitted withdrawal volumes.

Figure 4.13 (Simulation 3) depicts the NWWRF operating at full capacity and the nearby NWSA well field operating at future projected 2010 withdrawal volumes.

The base grade elevations as shown on Figure 4 include an additional five feet above the expected seasonal high and mounding groundwater conditions. PB Water Simulation 2 data was selected and is considered conservative since no land filling is expected to occur until after the 2010 projections of Simulation 3. Figure 4 was also developed as a result of several meetings with OCU and their consultant PB Water. Figure 4 was first submitted to the FDEP under separate cover and title as a base grade modification to the BD4 ERP borrow pit permit (48-187635-003), which was subsequently approved and issued on April 27, 2004.

Attached as Exhibit L, Figure 4a reflects the expected Lake Cora Lee/RIB groundwater mound elevations plotted above the Devo Engineering seasonal high groundwater elevations, together both which will remain at least five feet beneath the proposed landfill base grade elevations.

In Summary, while it may not have been clear, Figure 4 as previously submitted had incorporated both the PB Water mounding and the February 2004 Devo Engineering Report Figures 1.2 & 1.3 groundwater conditions. The base grade elevations shown on Figure 4 include an additional five feet above the expected groundwater conditions

13. Submit a closure and long-term care cost estimate for the BD4 parcel, signed and sealed by a professional engineer, licensed in Florida.

Response: The closure and long term care costs estimates submitted with the original site (BD2) permit cover the first four landfill cells to be filled identified as Cells 1 through 4. This cost estimated was approved at the time of permit issuance in March of 2001. The BD4 permit modification currently under review adds additional landfill acreage that is not expected to be filled until well after the first five-year period. As required in the Special Conditions to Permit Nos. SO48-185969-001 & SO48-0165969-002, the approved financial mechanism will be in place at least 60 days prior to the first receipt of waste at the site.

Based on previous discussions and permitting with the Central District Office, it is proposed that the current approved financial responsibility amount for the existing permitted site is still applicable. This amount would be subject to the regular annual inflationary increases. Approaching the financial responsibility demonstration in a sequential manner provides coverage for all landfill areas expected to be filled within the first five year permit period (Cells 1 through 4). The annual update for the approved closure and long term care costs with the inflationary factor is current and covers 2003-2004.

Expansion area Cells 5 through 8 and 9 through 12 will not receive waste without prior Department approval of updated cost estimates for closure and long-term care covering the additional acreage and volume. To make certain that cells 5 through 12 do not receive waste prior to Department approval, the following conditions are proposed;

1. Only Cells 1 through 4 of the permitted site will be filled prior to submittal of the closure and long term costs for the expanded areas (Cells 5 through 8 (BD3) and Cells 9 through 12 (BD4)).
2. Monuments will be installed at the landfill site to mark the limits of Cell 4 where it adjoins BD3 site. Monuments will be installed along the south end of BD3 to show the expansion onto BD4. These monuments will allow for visual onsite inspections of waste placement between the original and expansion areas. No waste will be placed outside these markers prior to acceptance of and execution of a new financial mechanism.
3. A modified financial mechanism will be in place 60 days prior to placement of waste in the expansion areas BD3 & BD4 (Cells 5 through 12).

14. Financial responsibility arrangements for the facility are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and a copy of the approval letter submitted to: Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767.

Response: As required in the Special Conditions to Permit Nos. SO48-185969-001 & SO48-0165969-002, the approved financial mechanism will be in place at least 60 days prior to the receipt of waste at the site. We request that this same requirement be placed as a Special Condition in the permitting of the expansion area.

15. The Department intends to describe the Zone of Discharge as follows: "The zone of discharge for the facility shall be a three dimensional volume, defined in the vertical plane as extending from the top of the ground to the base of the surficial aquifer, (water table aquifer), and defined in the horizontal plane as extending 100 feet from the edge of the solid waste deposit, or to the property boundary, whichever is less, as depicted on Exhibit III of this permit. The horizontal plane is described on the Soil Boring Location Map, Figure 2 plan view drawing. The vertical plane is depicted on Figure 3, the accompanying cross-section drawing. Class G-ii water quality standards must be met at the boundary of the zone of discharge in accordance with Rule 62-522.410, F.A.C." Do you concur that these drawings adequately depict the zone of discharge, or do you wish to submit additional drawings or information to define the Zone of Discharge?

Response: Yes, Figures 2 and 3 as noted above adequately depict the zone of discharge.

APPENDIX A

RECEIVED

AUG 17 2004

Central Dist. - DEP

BUTTREY DEVELOPMENT FOUR, L.L.C.

May 24, 2004

Mr. Jay Davoll, P.E.
City Engineer
City of Apopka
120 E. Main St.
Apopka, Florida 32704

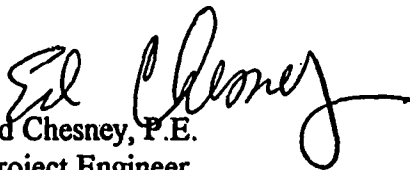
Subject: Class III Landfill Expansion Application
Keene Road Disposal/Buttrey Development Class III Landfill
Permit Nos. 03-A01-300 & FDEP (SC48-0165969-001 & SO48-0165969-002)

Dear Mr. Davoll:

This application is for a permit renewal and expansion to the above referenced subject, located at 230 W. Keene Road in Apopka Florida. The 40 acre expansion parcel is owned and being permitted by Buttrey Development Four, LLC (BD4). An identical application is also being submitted to the FDEP Central District for review. The following sections are intended to satisfy both the City of Apopka and FDEP regulations to the best of my understanding of the required materials.

If anything has been omitted, or you require additional information please do not hesitate to call me a 407- 296-0016.

Sincerely,


Ed Chesney, P.E.
Project Engineer

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6239 Edgewater Dr., Suite D-1, Orlando, Florida 32810-4747
Telephone: (407) 296-0016; FAX: (407) 294-8090

APPENDIX B

BUTTREY DEVELOPMENT THREE, LLC

August 6, 2004

ORIGINAL

Mr. James N. Bradner, P.E.
Program Manager-Solid and Hazardous Waste
State of Florida
Department of Environmental Protection, Central District
3319 Maguire Boulevard, St. 232
Orlando, Fl. 32803-3767


Subject: Authorization to file for Permits-Buttrey Development Four, LLC
The NW ¼ of the SE ¼ of S28, T21, R28, Orange County, Fl.
Permit Application Nos. SC48-0165969 & SO48-0165969-009

Dear Mr. Bradner:

Buttrey Development Two, LLC (BD2) and Buttrey Development Three, LLC (BD3) are the owners of the first two phases of the Keene Rd. Disposal Class III Landfill located on Keene Rd. in Apopka. WASTE MANAGEMENT INC. OF FLORIDA (WMF) is the sole owner of Buttrey Development Two, LLC and Buttrey Development Three, LLC.

Buttrey Development Four, LLC (BD4) is owned by others and is currently requesting permits to tie this latest section of the landfill into the existing BD3 section. This authorization is to advise your department that WASTE MANAGEMENT INC. OF FLORIDA, as owner of BD2 and BD3, fully supports the issuance of permits for BD4 which will allow the BD4 landfill to tie into the BD3 landfill. WMF further authorizes Ed Chesney, P.E., John Buttrey, and Buttrey Development Four, LLC to act as its agents' for the limited purpose of this permitting, and modifications to its facilities.

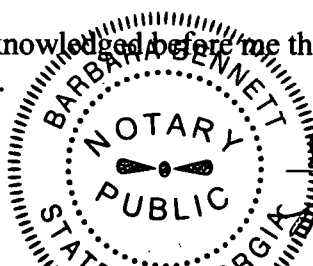
Sincerely,


Charles Compagna

WASTE MANAGEMENT INC. OF FLORIDA

State of Georgia
County of Alachua

The foregoing was acknowledged before me this 4th day of August, 2004.
He is personally known to me.




Notary Public

255 W. Keene Rd., Apopka, FL 32703
PHONE 407-889-2920 FAX 407-889-8043

Commission expires 8/49/07

BUTTREY DEVELOPMENT THREE, LLC

August 6, 2004

ORIGINAL

Mr. James N. Bradner, P.E.
Program Manager-Solid and Hazardous Waste
State of Florida
Department of Environmental Protection, Central District
3319 Maguire Boulevard, St. 232
Orlando, Fl. 32803-3767

Subject: Authorization to file for Permits-Buttrey Development Four, LLC,
Modify BD3 Permit bringing height into conformity with City of Apopka Permit
Permit Application Nos. SC48-0165969 & SO48-0165969-009

Dear Mr. Bradner:

Buttrey Development Two, LLC (BD2) and Buttrey Development Three, LLC (BD3) are the owners of the first two phases of the Keene Rd. Disposal Class.III Landfill located on Keene Rd. in Apopka. WASTE MANAGEMENT INC. OF FLORIDA (WMF) is the sole owner of Buttrey Development Two, LLC and Buttrey Development Three, LLC.

Buttrey Development Four, LLC (BD4) is owned by others and is currently requesting permits to tie this latest section of the landfill into the existing BD3 section. This permit application requests the height of the BD3 Landfill as presently approved by FDEP, be lowered by 10' to a 50' high rise. This BD3 modification is shown on Sheet 3 of 5 of the subject applications, as well as numerous other references throughout the BD4 application. The height of this landfill is restricted to the lower height by the City of Apopka Solid Waste Ordinance. The City's ordinance also requires that all other permits, including FDEP, be compatible with the City's approved Permit.

This authorization is to advise your department that WASTE MANAGEMENT INC. OF FLORIDA, as owner of BD3, fully supports the issuance of permits for BD4 which will, among other things, allow the height of the BD3 Landfill be lowered by 10' for the reasons pointed out above. WMF further authorizes Ed Chesney, P.E., John Buttrey, and Buttrey Development Four, LLC to act as its agents' for the limited purpose of modifying the existing BD3 permit.

Sincerely,



Charles Compagna,

WASTE MANAGEMENT INC. OF FLORIDA

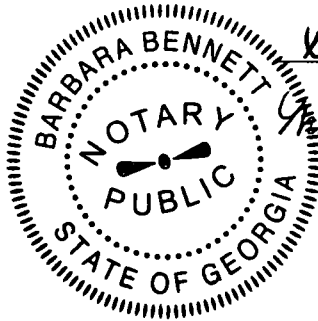
Page 2
August 6, 2004

ORIGINAL

State of Georgia

County of Colch

The foregoing was acknowledged before me this 4th day of August, 2004



Barbara Bennett

Notary Public

My commission expires 8/29/07

APPENDIX C

Applicant name (operating authority): Buttrey Development Four, LLC

Mailing address: 6239 Edgewater Drive, Suite D-1, Orlando, FL 32810
Street or P.O. Box City State Zip

Contact person: John Buttrey Telephone: (407) 296-0016

Title: Manager

bishopbuttrey@cfl.rr.com
E-Mail address (if available)

9. Authorized agent/Consultant: Ed Chesney, P.E.

Mailing address: 6239 Edgewater Dr., Suite D-1, Orlando, FL 32810
Street or P.O. Box City State Zip

Contact person: Ed Chesney, P.E. Telephone: (407) 296-0016

Title: Project Engineer

bishopbuttrey@cfl.rr.com
E-Mail address (if available)

10. Landowner (if different than applicant): N/A

Mailing address: N/A
Street or P.O. Box City State Zip

Contact person: _____ Telephone: () _____

E-Mail address (if available)

11. Cities, towns and areas to be served: Northwest Orange County & Metro Orlando

12. Population to be served:
Current: ± 100,000 Five-Year Projection: + 100,000

13. Date site will be ready to be inspected for completion: 2015

14. Expected life of the facility: 17-18 years

15. Estimated costs:
Total Construction: \$ proprietary Closing Costs: \$ _____

16. Anticipated construction starting and completion dates:
From: 2005 To: 2022

17. Expected volume or weight of waste to be received:
± 5,000 yds³/day _____ tons/day _____ gallons/day

EXHIBIT D

B. DISPOSAL FACILITY GENERAL INFORMATION

1. Provide brief description of disposal facility design and operations planned under this application:

This application proposes to expand the existing landfill site. The existing site is 110 acres with approximately 70 acres permitted to accept Class III waste. The expansion site is 40 acres with approximately 31 acres permitted as a borrow pit. The expanded facility will encompass 150 acres, with approximately 102 acres of Class III air space.

2. Facility site supervisor: Vic McCall
Title: Field Supervisor Telephone: (407) 296-0016

N/A

E-Mail address (if available)

3. Disposal area: Total + 102 acres; Used 0 acres; Available + 102 acres.
4. Weighing scales used: ☒ Yes ☐ No
5. Security to prevent unauthorized use: ☒ Yes ☐ No
6. Charge for waste received: * \$/yds³ \$/ton * based on market
7. Surrounding land use, zoning:

| | |
|--|--|
| <input checked="" type="checkbox"/> Residential | <input checked="" type="checkbox"/> Industrial |
| <input checked="" type="checkbox"/> Agricultural | <input type="checkbox"/> None |
| <input type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Other Describe: <u>institutional</u> |

8. Types of waste received:

| | |
|--|--|
| <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> C & D debris |
| <input type="checkbox"/> Commercial | <input type="checkbox"/> Shredded/cut tires |
| <input type="checkbox"/> Incinerator/WTE ash | <input checked="" type="checkbox"/> Yard trash |
| <input type="checkbox"/> Treated biomedical | <input type="checkbox"/> Septic tank |
| <input type="checkbox"/> Water treatment sludge | <input type="checkbox"/> Industrial |
| <input type="checkbox"/> Air treatment sludge | <input type="checkbox"/> Industrial sludge |
| <input type="checkbox"/> Agricultural | <input type="checkbox"/> Domestic sludge |
| <input type="checkbox"/> Asbestos | |
| <input type="checkbox"/> Other Describe: <u></u> | |

9. Salvaging permitted: ☐ Yes ☒ No
10. Attendant: ☒ Yes ☐ No Trained operator: ☒ Yes ☐ No
11. Spotters: Yes ☒ No ☐ Number of spotters used: 2
12. Site located in: ☐ Floodplain ☐ Wetlands ☒ Other Uplands only



EXHIBIT E

- Glass and plastic (as markets dictate)
- Tires
- Yard waste and wood waste ("clean wood" as defined in Florida Chapter 62-701.200(16))
- Other materials as future markets or uses dictate

1.4.5.2 Removal, storage and marketing recyclables

- Spotters and Equipment Operators will remove targeted materials when the occasion arises and removal can be accomplished safely.
- Targeted materials will be segregated and placed in separate roll-off boxes or storage piles
- Storage piles will be used only for clean concrete and aggregate byproducts or clean wood waste (no treated lumber, "clean wood" as defined in Florida Chapter 62-701.200(16))
- No materials will be retained on site more than 30 days without permission from the City of Apopka
- Except for storage piles containing clean concrete and/or aggregate by products ("clean debris" as defined in Florida Chapter 62-701.200(15)) or clean wood waste ("clean wood" as defined in Florida Chapter 62-701.200(16)), all containers will be covered when not in use
- Personnel will be provided with gloves, hard hats, and other appropriate safety equipment when removing materials for recycling
- Excessively contaminated materials will not be removed for recycling.
- Amounts of recycled materials will be recorded and reported quarterly to FDEP to support the industry 30% recycling goal
- Materials removed from the waste stream may be utilized on site, where applicable, or marketed to local brokers or recycling companies
- Materials leaving the site will be properly secured, covered, or containerized to prevent spillage and litter

No mechanical processing of recyclable materials (other than periodic wood grinding performed with properly permitted temporary equipment) will be conducted without proper approval from. Processing of recyclable materials over the life of the landfill will be accomplished through permanent operations plans modifications or the use of permitted off-site processing vendors..

- No recycling activities will take place in landfill setback areas. Areas for storage and stockpiling of recovered materials will be located within the permitted footprint of the landfill and will move as fill sequencing dictates.
- Recovered materials storage locations will move across the active landfill area in the same sequence as the landfill construction (filling) activities. Typically, storage areas will be within 500 feet of the active disposal areas, where the materials can be loaded and unloaded safely, and where they can be completely separated from solid waste in disposal areas.

EXHIBIT F

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Florida DEP Solid Waste Management Facility Operator Transcript

Certificate: **Class I, II, III Landfill Operator**
Track: **Standard Landfill Track**

Initial Date: **09/13/02**
Expiration Date: **09/12/05**

Status: **Current**

Oliver, Robert E
District Manager
Waste Management Inc.
255 W. Keene Rd
Apopka, FL 32703

Phone: (407) 886-2920
Fax: (407) 889-8043
Email: boliver@wm.com

Time Period: **Prior to Initial Date**

| <u>Course #</u> | <u>Course Completed</u> | <u>Course Provided By</u> | <u>Completion Date</u> | <u>Hours</u> |
|-----------------|---|-------------------------------|------------------------|--------------|
| 21 | Solid Waste Landfill Operator's Short School | University of Florida - TREEO | 11/15/96 | 0 |
| 91 | Eight-Hour Spotter Training for Construction and Demolition Sites | University of Florida - TREEO | 01/17/98 | 8 |
| 39 | Stormwater Management for Landfills | University of Florida - TREEO | 04/19/99 | 8 |

Time Period: **09/13/02 - 09/12/05**

| <u>Course #</u> | <u>Course Completed</u> | <u>Course Provided By</u> | <u>Completion Date</u> | <u>Hours</u> |
|-----------------|---|--|------------------------|--------------|
| 160 | SWANA-Manager of Landfill Operations (MOLO) | Solid Waste Association of North America (SWANA - Florida Chapter) | 09/13/02 | Initial |

Total hours toward Continuing Education: 0

Hours taken prior to your initial course do not count toward your solid waste training.

Continuing Education (CE) Minimum 3 Year Requirement:
I,II,III/C&D-16 hours; TS/MRF-8 hours; Spotter-4 hours
Expired: If you have exceeded the 3 year training period without completing the minimum number of CE, you must start over by taking an approved initial course and pass exam.

Initial hours are not counted toward continuing education.

If you have any questions, please contact djenkin@treeo.ufl.edu or jtought@treeo.ufl.edu or call 352.392.9570 extensions 127, 112, or 130.

Last Updated: 12/6/2002 9:57:59 AM
Date Printed: Tuesday, April 20, 2004

UF Division of Continuing Education: Participant Information

Page 1 of 1

Florida DEP Solid Waste Management Facility Operator Transcript

Certificate: **Class I, II, III Landfill Operator**
Track: **Standard Landfill Track**

Initial Date: **09/14/01** Status: **Current**
Expiration Date: **09/13/04**

Watts, James
OPS Manager
Keene Road Landfill
255 West Keene RD
Apopka, FL 32810

Phone: (407) 886-2920
Fax: (407) 889-8043
Email: bones48@msn.com

Time Period: **Prior to Initial Date**

| <u>Course #</u> | <u>Course Completed</u> | <u>Course Provided By</u> | <u>Completion Date</u> | <u>Hours</u> |
|-----------------|--|-------------------------------|------------------------|--------------|
| 21 | Solid Waste Landfill Operator's Short School | University of Florida - TREEO | 05/21/93 | 0 |
| 36 | Waste Screening and Identification for Landfill Operators and Spotters | University of Florida - TREEO | 03/16/95 | 8 |
| 39 | Stormwater Management for Landfills | University of Florida - TREEO | 05/21/96 | 8 |
| 71 | Asbestos Awareness Course for Landfill Operators | University of Florida - TREEO | 04/22/99 | 4 |

Time Period: **09/14/01 - 09/13/04**

| <u>Course #</u> | <u>Course Completed</u> | <u>Course Provided By</u> | <u>Completion Date</u> | <u>Hours</u> |
|-----------------|---|-------------------------------|------------------------|--------------|
| 160 | SWANA-Manager of Landfill Operations (MOLO) | University of Florida - TREEO | 09/14/01 | Initial |
| 240 | WMI Odor School | WMI / St. Croix Sensory, Inc. | 05/29/02 | 7 |

Total hours toward Continuing Education: 7

Hours taken prior to your initial course do not count toward your solid waste training.

Continuing Education (CE) Minimum 3 Year Requirement:
I,II,III/C&D-16 hours; TS/MRF-8 hours; Spotter-4 hours
Expired: If you have exceeded the 3 year training period without completing the minimum number of CE, you must start over by taking an approved initial course and pass exam.

Initial hours are not counted toward continuing education.

If you have any questions, please contact djenkin@treeo.ufl.edu or jtoucht@treeo.ufl.edu
or call 352.392.9570 extensions 127, 112, or 130.

Last Updated: 11/5/2002 9:30:00 AM
Date Printed: Tuesday, April 20, 2004

Florida DEP Solid Waste Management Facility Operator Transcript

Certificate: **Class I, II, III Landfill Operator**
Track: **Standard Landfill Track**

Initial Date: **07/01/01** Status: **Current**
Expiration Date: **06/30/04**

Wiggand , Brian
Waste Management - Apopka
255 W Keene Road
Apopka, FL 32703

Phone: (407) 886-2920
Fax: (407) 889-8043

Time Period: **07/01/01 - 06/30/04**

| <u>Course #</u> | <u>Course Completed</u> | <u>Course Provided By</u> | <u>Completion Date</u> | <u>Hours</u> |
|-----------------|--|---------------------------|------------------------|--------------|
| 195 | 24-Hour Initial Training Course for Landfill Operators (Class I, II, III and C&D Sites) | Kohl Consulting, Inc. | 07/01/01 | Initial |

Total hours toward Continuing Education: 0

Continuing Education (CE) Minimum 3 Year Requirement:
I,II,III/C&D-16 hours; TS/MRF-8 hours; Spotter-4 hours
Expired: If you have exceeded the 3 year training period without completing the minimum
number of CE, you must start over by taking an approved initial course and pass exam.

Initial hours are not counted toward continuing education.

If you have any questions, please contact djenkin@treeo.ufl.edu or jtoucht@treeo.ufl.edu
or call 352.392.9570 extensions 127, 112, or 130.

Last Updated: 2/23/2002 8:56:00 PM
Date Printed: Tuesday, April 20, 2004

Florida DEP Solid Waste Management Facility Operator Transcript

Certificate: **Spotter / Waste Screener**
Track: **Spotter**

Initial Date: **11/01/01**
Expiration Date: **10/31/04**

Status: **Current**

Turner , Jessi J.
Spotter
Waste Management
355 W Keene Rd
Apopka, FL 32810

Phone: (407) 886-2920

Time Period: **11/01/01 - 10/31/04**

| <u>Course #</u> | <u>Course Completed</u> | <u>Course Provided By</u> | <u>Completion Date</u> | <u>Hours</u> |
|-----------------|---|-------------------------------|------------------------|--------------|
| 147 | Training for Spotters at Construction and Demolition Sites, Landfills and Transfer Stations | University of Florida - TREEO | 11/01/01 | Initial |

Total hours toward Continuing Education: 0

Continuing Education (CE) Minimum 3 Year Requirement:
I,II,III/C&D-16 hours; TS/MRF-8 hours; Spotter-4 hours
Expired: If you have exceeded the 3 year training period without completing the minimum number of CE, you must start over by taking an approved initial course and pass exam.

Initial hours are not counted toward continuing education.

If you have any questions, please contact djenkin@treeo.ufl.edu or jtoucht@treeo.ufl.edu
or call 352.392.9570 extensions 127, 112, or 130.

Last Updated: 2/22/2002 3:22:00 PM
Date Printed: Tuesday, April 20, 2004

Kohl Consulting Inc.
Is Proud to Certify That
John E. Cook

Has Successfully Completed the
24 Hour Initial Training Course for
Solid Waste Management
Facility Operators Entitled :
24 Hour Initial Training for
Landfill Operators (#196)

November 5th, 6th, and 7th 2002
And Has Successfully Completed the Required Examination
in Accordance with the Training Requirements
for Landfill Operators in Florida

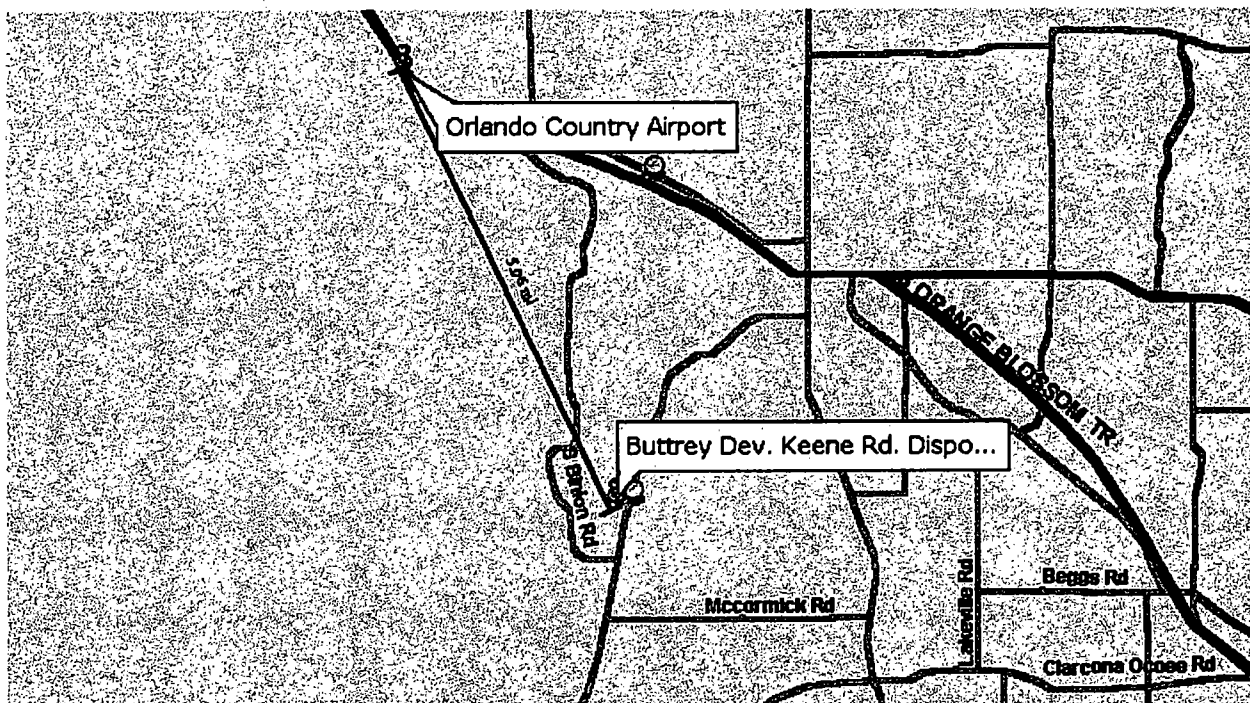
Signed this 11th Day of December, 2002



Chris S. Kohl

President

EXHIBIT G



Airport distance from site = 5.06 miles

EXHIBIT H

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1.20.2 Nearest Airport

The nearest airport to the Buttrey Development Keen Road Class III Landfill site is the Orlando Country Airport, located at 4040 W. Orange Blossom Trail, Apopka, Florida, 32712. This is a airport for piston driven aircraft and is located slightly more than 5 miles from the landfill site (see map, below)

1.20.3 FIRE PROTECTION AND FIRE FIGHTING FACILITIES

Fires that originate in landfills are primarily extinguished by soil application. The City of Apopka Fire Department, Station No.1, supplies supplemental fire protection. In addition, all equipment and site vehicles are equipped with fire extinguishers and radio/cell phone communication to notify personnel in the event of a fire. Cover dirt is always available on site and can be quickly accessed to extinguish as necessary.

1.21 Final Grade Plan

The final grade plan of the facility is shown on Sheet 3 of 5 of the construction plans submitted with the Permit application. No solid waste will be placed below elevation 73 feet-NGVD. The maximum elevation including final cover is proposed at an elevation of 50' above existing site grades.

EXHIBIT I

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EXHIBIT J



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ENGINEERING SCIENCES

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PHASE I ENVIRONMENTAL SITE ASSESSMENT
PROPOSED BORROW PIT
3029 MCQUEEN ROAD
ORANGE COUNTY, FLORIDA

UES Project No. 12474-002-01
Report No. 350342
Date: June 2004

Prepared For:

Buttrey Development IV
6239 Edgewater Drive, Suite D-1
Orlando, Florida 32810

Prepared By:

Universal Engineering Sciences, Inc.
3532 Maggie Boulevard
Orlando, Florida 32811
(407)423-0504
www.uesorl.com

Prepared By:

Ronald C. Neyer, E.I.
Staff Engineer

Reviewed by:

David C. Beerbower, P.G.
Vice President - Environmental Services
Florida License No. 0000828

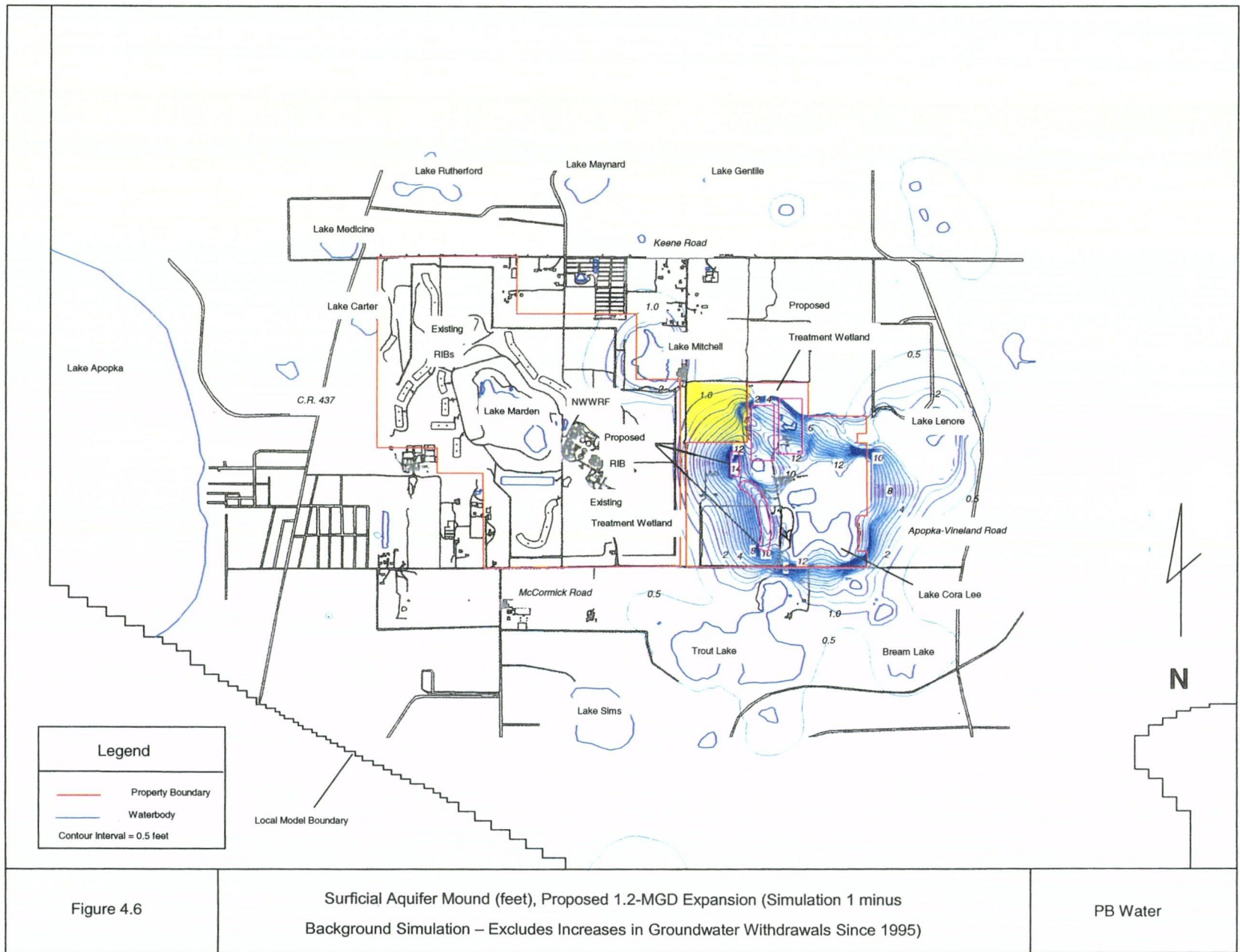
DCB

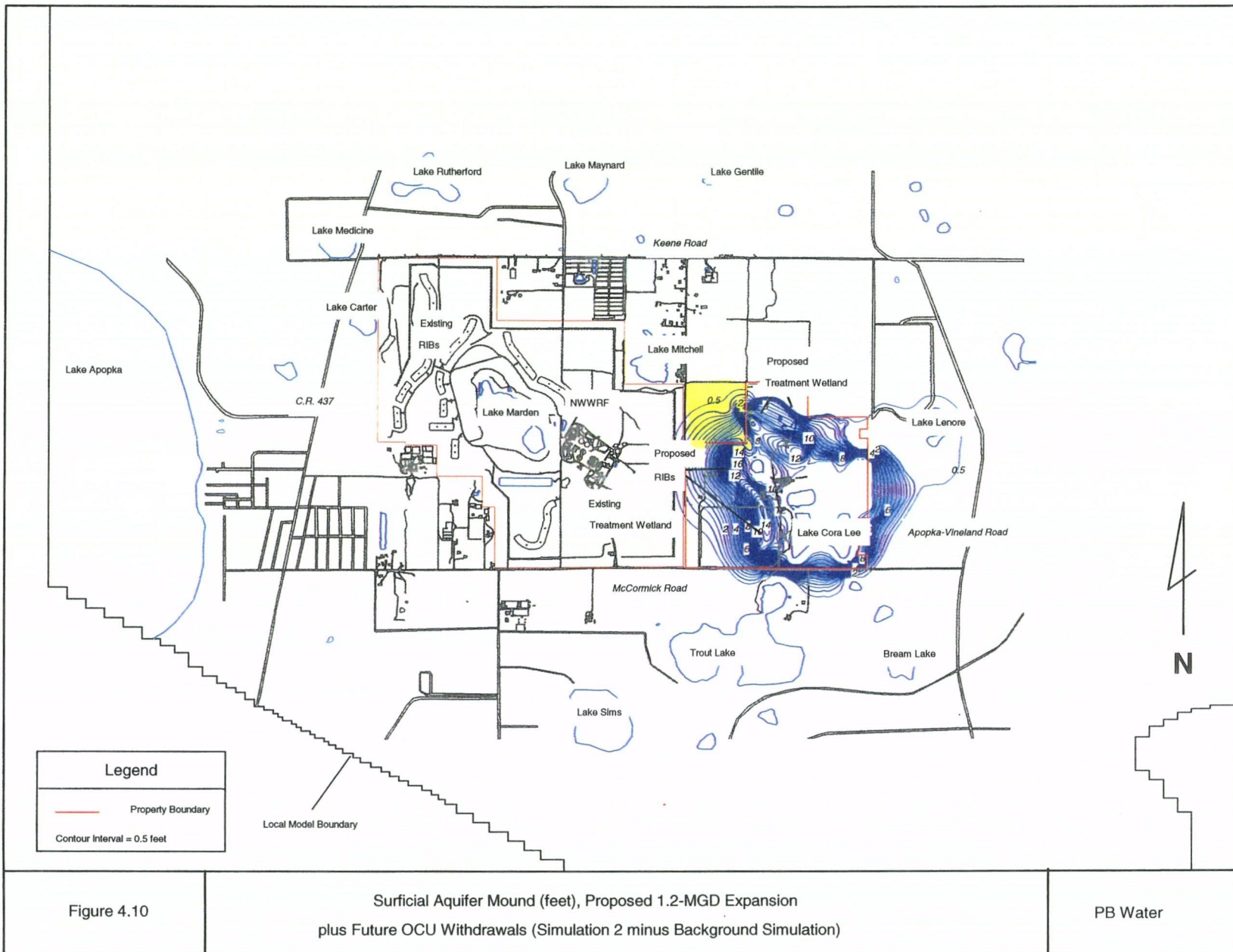
6/16/04

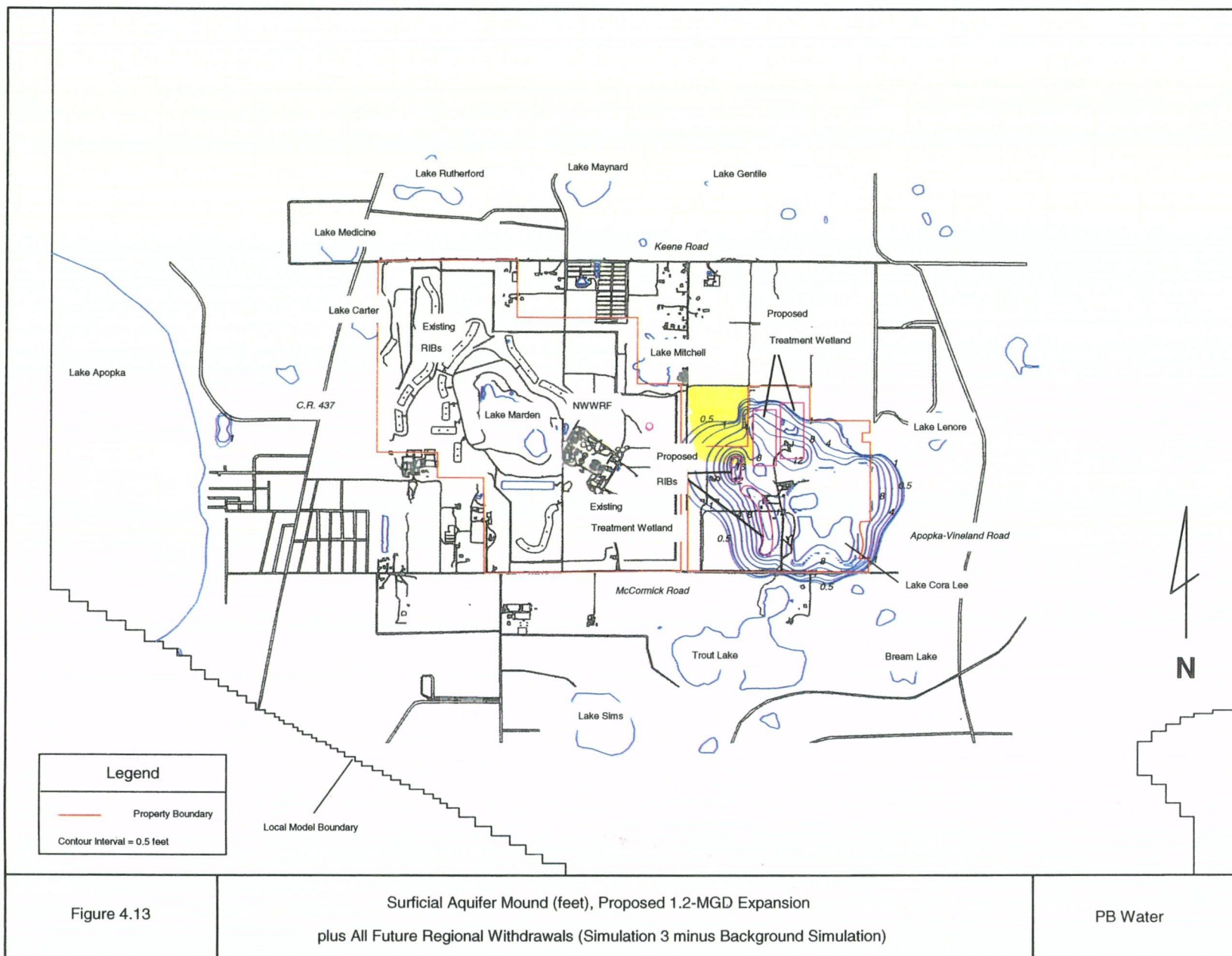
Consultants in: Geotechnical Engineering • Environmental Sciences • Construction Materials Testing • Threshold Inspections
Offices in: Orlando • Gainesville • Riviera Beach • Rockledge • Daytona Beach • Punta Gorda • St. Augustine • Jacksonville • Ocala • Tampa

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EXHIBIT K







the constant head boundary condition assigned to the Floridan aquifer layer. Finally, the local model was run for each simulated condition to determine refined sub-regional estimates of groundwater flows and levels in the vicinity of the NWWRF and expansion areas.

Table 4.2. Summary of Groundwater Modeling Simulations

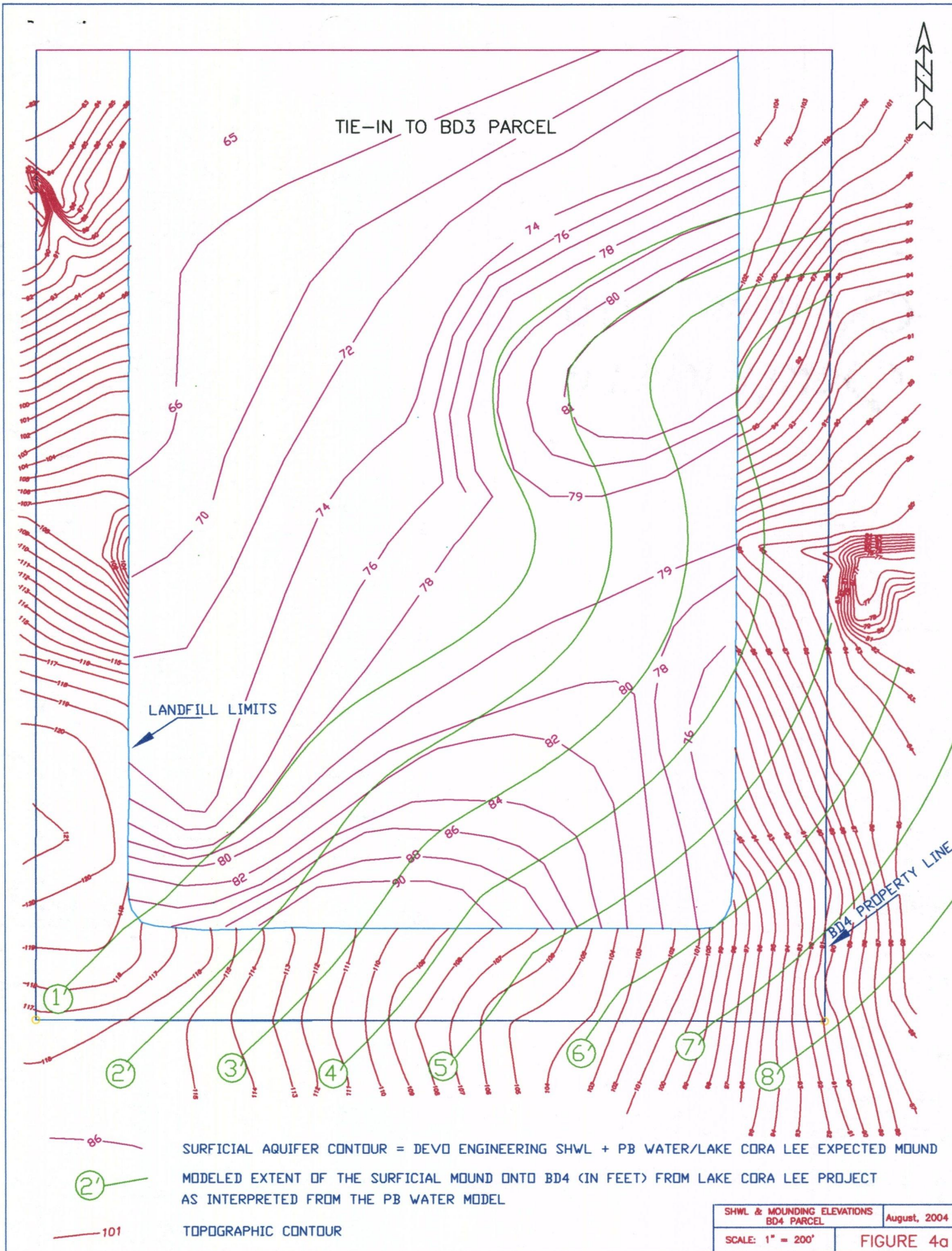
| Simulation ID | Description | Scenario |
|---|---|---|
| Background | A simulation of background conditions ⁽¹⁾ , with recharge at the NWWRF property included at current permitted level of 7.5 MGD AADF (4.5 MGD RIBs, 3.0 MGD Lake Marden augmentation). | Currently permitted recharge conditions with 1995 withdrawals. |
| Simulation 1 | A simulation representing background plus proposed NWSA reuse system expansion of additional 1.2 MGD AADF onto eastern parcels (0.4 MGD RIBs expansion, 0.8 MGD Lake Cora Lee augmentation). | As above, plus new NWSA recharge facilities. |
| Simulation 2 | A simulation of proposed NWSA 1.2 MGD AADF reuse expansion (same as Simulation 1), plus Orange County Utilities (OCU) wellfield withdrawals increased to maximum currently permitted levels. | As above, plus currently permitted increased Orange County withdrawals. |
| Simulation 3 | A simulation of proposed NWSA 1.2 MGD AADF reuse expansion (same as Simulation 1), plus all wellfield withdrawals in the east-central Florida region increased to maximum anticipated levels. These maximum anticipated levels were a combination of maximum current permit levels (for utilities with recently issued permits) or SJRWMD-projected 2006 levels (for utilities with old permits or permits in process). | Currently permitted recharge conditions, plus new NWSA recharge facilities, plus best estimate of year 2006-2010 withdrawals. |
| (1) Year 1995 hydrologic conditions were used as general background input data, as a reasonable baseline point of comparison. | | |

4.3.1 Background Simulation—Current Permitted Condition

The NWSA reuse system is currently permitted through the FDEP for 7.5 MGD AADF of reclaimed water application, consisting of 4.5 MGD AADF at the 13 existing NWWRF RIBs and 3.0 MGD AADF for the planned Lake Marden constructed treatment wetland/lake augmentation system. As a starting point for the analysis of potential expansion recharge facilities, a Background Simulation was prepared representing the current permitted NWSA reuse system condition of 7.5 MGD AADF. Expansion modeling scenarios could then be directly compared to this Background Simulation to compute net changes in the groundwater flow system.

To prepare the Background Simulation, 7.5 MGD of artificial recharge was applied in the *MODFLOW* recharge package on the NWWRF property, divided as 4.5 MGD on the RIBs and 3.0 MGD of additional recharge on Lake Marden. The Lake Marden constructed wetland was included in the simulation, as described in the original PB modeling report (PB,

EXHIBIT L



Williams, Elizabeth

From: Ed Chesney [bishopbuttrey@cfl.rr.com]
Sent: Wednesday, July 14, 2004 4:35 PM
To: Bradner, James
Cc: Williams, Elizabeth
Subject: RE: Correspondence for John Buttrey and Ed Chesney

Yes we did receive the letter.

Thank you, Ed

-----Original Message-----

From: Bradner, James [mailto:James.Bradner@dep.state.fl.us]
Sent: Wednesday, July 14, 2004 4:21 PM
To: bishopbuttrey@cfl.rr.com
Cc: Williams, Elizabeth
Subject: Correspondence for John Buttrey and Ed Chesney

<<0231 Keene Rd.Buttrey rai.pdf>>

Please acknowledge receipt of this letter by return electronic mail to
Elizabeth Williams



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Colleen Castille
Secretary

By E-Mail
bishopbuttrey@cfl.rr.com

Mr. John Buttrey
Buttrey Development Four, LLC
6239 Edgewater Drive, Suite D-1
Orlando, FL 32810

OCD-SW-04-0231

Orange County - SW
Keene Road Disposal/Buttrey Development
Class III Landfill Expansion - Construct and Operate
Permit Application Nos. SC48-0165969-008 & SO48-0165969-009

Dear Mr. Buttrey:

Your application for permit received on June 15, 2004, is incomplete. Please provide the information listed on the attached sheet promptly. Evaluation of your application will be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within **30 days** of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact George Cheryan or me at (407) 893-3328.

Sincerely,

James N. Bradner, P.E.
Program Manager
Solid and Hazardous Waste

Date: July 14, 2004

JNB/gc/ew

Enclosure

cc: Ed Chesney, P.E.
bishopbuttrey@cfl.rr.com

1. The applicant is required to notify the local government having jurisdiction over the facility of the filing of the permit application before or on the same day of filing the application with the Department. Submit proof to the Department that the local government was notified.

2. For item A-3, page 4 of 40, DEP Form # 62-701.900(1), insert a check mark against "New," delete the check mark against "Substantial Modification," and submit the revised page. The application cannot be treated as an application for modification because the current permittee for the sites BD Two and BD Three, LLC is different from the applicant for the new expansion site, BD Four, LLC.

3. Item A-13 on page 5 of 40, DEP Form # 62-701.900(1) refers to construction completion of the new site and not closure completion. Submit the revised page with the appropriate information.

4. Page 5 of the Operations Plan states that the disposal area is approximately 102 acres. Items B-1 and B-3 on page 6 of 40, DEP Form # 62-701.900(1), indicate the disposal area to be approximately 100 acres. Please submit the revised page of the Operations Plan with the correct acreage for the disposal area, so both documents will be consistent.

5. The recycling activities on page 14 and page 15 of the report indicate that the facility needs a Waste Processing Facility permit to cover the recycling activities. Submit an Application to Construct, Operate, or Modify a Waste Processing Facility, effective 5-27-01 with an application fee of \$2,000.

6. The Training Plan on pages 41 and 42 of the report does not indicate that the facility has an adequate number of trained spotters and operators, proof of their most recent training, list of courses for operators and spotters, and a schedule for future training to ensure that the facility meets the requirements of Rule 62-701.320(15), F.A.C. Submit a Training Plan that shall include but not be limited to:

- A list and schedule of all classes to be attended by operator(s) and spotter(s).
- List of operators and spotters scheduled for training.
- A mechanism for providing documentation of training.
- All training courses, whether public or in-house, shall be approved by the Department in accordance with Section 403.716, F.S. Any in-house operator-training program, which includes an examination required by this subsection, must be administered by an independent third party.
- Any other in-house operator-training program must be administered by a trained operator. The Training Plan, along with records documenting how the training plan is being implemented, shall be kept at the Facility at all times and be made available for inspection by Department staff.

7. Page 48, Section 1.20.2 of the report, references a map which has not been received. Submit the map or provide the revised page with the appropriate reference.

8. Page 48, Section 1.21 of the report, references the Final Grade Plan to Sheet 6 of the construction plans. The construction plan only has 5 sheets. Submit the revised page with the appropriate reference for the Final Grade Plan.

9. Page 1; Section 1.2 of the Engineering Report, requests modification of BD3 parcel from a 60-foot high rise to a 50-foot high rise. Waste Management, Inc. of Florida, the current permittee, must apply separately for any modification to the permit for the BD3 parcel.

10. Exhibit A in the report is not signed and sealed by a professional engineer licensed in Florida. Submit Exhibit A, signed and sealed by a professional engineer licensed in Florida.

11. Provide information to indicate that none of the wells in Exhibit A are in violation of the prohibitions of Rule 62-701.300, F.A.C.

12. The Water Table Estimates & Proposed Base Grade Elevations report does not incorporate any anticipated mounding impact resulting from the proposed Lake Cora Lee wetland treatment system to the east of BD4, and the proposed rapid infiltration basins (RIBs) south of BD4. The boundaries of these proposed projects are within 0-100 feet of BD4 and must be taken into account as part of the permit application review process. Submit a map showing the projected surficial ground water aquifer contours with the proposed Lake Cora Lee and RIBs impacts. The map should be the same scale as Figure 4, Base Grade Elevations BD4 Parcel, so that they may be compared.

13. Submit a closure and long-term care cost estimate for the BD-4 parcel, signed and sealed by a professional engineer, licensed in Florida.

14. Financial responsibility arrangements for the facility are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and a copy of the approval letter submitted to: Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767.

15. The Department intends to describe the Zone of Discharge as follows: "The zone of discharge for the facility shall be a three dimensional volume, defined in the vertical plane as extending from the top of the ground to the base of the surficial aquifer, (water table aquifer), and defined in the horizontal plane as extending 100 feet from the edge of the solid waste deposit, or to the property boundary, whichever is less, as depicted on Exhibit III of this permit. The horizontal plane is depicted on the Soil Boring Location Map, Figure 2 plan view drawing. The vertical plane is depicted on Figure 3, the accompanying cross-section drawing. Class G-II water quality standards must be met at the boundary of the zone of discharge in accordance with Rule 62-522.410, F.A.C." Do you concur that these drawings adequately depict the zone of discharge, or do you wish to submit additional drawings or information to define the Zone of Discharge?