

COMPREHENSIVE ENGINEER'S REPORT

For

PERMIT RENEWAL OF C & D DEBRIS DISPOSAL FACILITY

Operated By

FRIENDS RECYCLING, L.L.C.

JN 12-03

January 28, 2013

Revised March 27, 2013

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Ocala, Marion County, Florida



GUERRA DEVELOPMENT CORPORATION

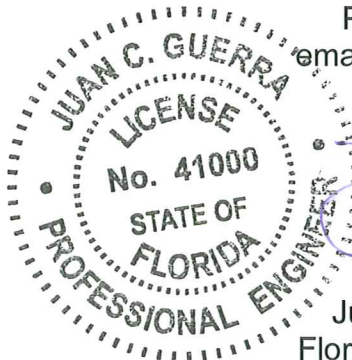
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1 GENERAL INFORMATION

1.1 Location and Access

The Friends Recycling C & D disposal site is located off NW 27th Avenue, just north on NW 21st Street, in Ocala, Marion County, Florida. The project property is located in section 2, Township 15, Range 21 East.

Access to the site can be made from I-75, exiting at US 27, heading east on US 27 to NW 27th Avenue, then north along NW 27th Avenue, approximately 1/4 mile north of NW 21st Street. The site's entrance is located on the west side on NW 27th Avenue.

1.2 Background

The Friends Recycling Landfill for C & D disposal (FRC&D) was permitted on November 1, 2002, permit number **SO42-0019600-005**. Subsequently, a 5-year permit renewal was issued by the Florida Department of Environmental Protection (FDEP), signed by Vivian F. Garfein, dated July 30, 2008, as described below:

WACS Facility: 21012
Permit Number: SO42-0019600-007
Expiration Date: 4/4/2013

This report along with attached and referenced supporting documentation is prepared for the purpose of renewal of the permit described above.

For the purpose of permit renewal, a pre-application meeting was held at the offices of the FDEP in Orlando, on January 15, 2013. Present at the meetings were, representing the applicant, Gerald Lourenco, Nick Giumarelli, Juan Guerra; and representing FDEP, Tom Lubozynski, Laxsamee Levin, Marjorie Heidorn, Gloria-Jean Depradine.

1.3 Site Information

Friends Recycling owns a total of 56.65 acres, as described below. See the Area Breakdown Map included in this Report.

1.3.1 Ownership Area: This area, **56.65 acres**, includes the total contiguous land owned or controlled by Friends Recycling LLC. Only a portion of this Ownership Area (see below) is permitted to receive C & D waste. Disclosure of this total area controlled by the owner is necessary for water management district permits and it is included for information purposes only.

The Ownership Area shown in this application for renewal is slightly less than on previous permits (56.65 acres versus 57.2 acres) due to a land dedication made by Friends Recycling LLC to the City of Ocala. Said dedication was made as right-of-way for an existing city street.

1.3.2 Facility Area: This area, **41.65 acres**, refers to the total area dedicated to the Friends Recycling facility and it includes driveways, buffers, buildings, the C&D disposal cells and portion of the property dedicated as a Drainage Retention Area (DRA), as required by the Saint Johns River Water Management District permit. This area was also reduced due to the right-of-way dedication discussed above, from 42.2 to 41.65 acres.

1.3.3 Disposal Area: This area, **26.8 acres**, remains unchanged from the previous permit; it represents the footprint of areas approved for disposal of C&D waste, or total area of approved cells ($14.5 + 12.3 = 26.8$ acres). The disposal area proposed under this permit renewal has not changed from the 2008 permit.

1.4 Permitting

1.4.1 The Friends Recycling facility provides a substantial service to the Ocala/Marion County community by accepting waste in a facility which is nearby and which is regulated.

1.4.2 The facility has been operating continuously since the original permit approval in 2002. Periodic inspections by FDEP representatives of the facility operations and of the mandated sampling of the monitoring wells indicates that the facility has been operating within the parameters set forth by the permit – This facility is in compliance.

1.4.3 The owners of the facility would like to continue operations and as required by permit conditions, are applying for a 10 year permit renewal.

2 ENGINEERING, SURVEYING AND SCIENTIFIC DATA

In accordance with 62-701.730(2)(a), this report and enclosures includes the following documentation:

2.1 Site Plan, 62-701.730(2)(a)1

2.1.1 A complete set of certified engineering drawings accompanies this submittal and per rule requirements include the following information:

- Site Plan prepare to a scale not greater than 200 feet to the inch.
- Project location map.
- Location and label identifying disposal units.
- Total area of the property, area of the site and of disposal units.
- Other relevant information:
 - Drainage, berms, access driveways, location of fences, gates, office and storage buildings, monitoring wells.

2.1.2 Potable water wells within 500 feet of the site, and community water systems within 1000 feet of the site were identified. The drawings included in this report show a shaded area representing required well setbacks with respect to the disposal facility.

2.2 Geotechnical Investigation

Geotechnical reports in accordance with Rule 62-701-420 were prepared for the original permit application. The following reports are still applicable and are included herewith by reference only.

2.2.1 "Subsurface Exploration, Ocala Recycling Addition, Marion County, Florida", CTL Project No. 0187151.200," dated October 2, 2001, prepared for Ocala Recycling c/o Guerra Development Corporation, prepared by Central Testing Laboratory, signed by Curtis M. Karr, P.E. This report is included in "Engineer's Report for Ocala Recycling, L.L.C., dated October 29, 2001, prepared by Guerra Development Corporation.

2.2.2 "Proposed Ocala Recycling 20 Acre Expansion Geotechnical Site Exploration," dated December 27, 2001, prepared for Ocala Recycling LLC, prepared by Geo-Tech, Inc., signed by William E. Smith, P.E.

2.3 Hydrogeological Investigation

2.3.1 Hydrogeological reports were prepared and accepted during the previous permitting cycle. These are still applicable and are included herewith by reference only.

2.3.1.1 A Phase I and Limited Phase II Environmental Site Assessment report was prepared as part of the original permit application. "Phase I and Limited Phase II Environmental Site of the property known as Commercial Property in the Vicinity of NW 27th Avenue and NW 21st Street, Ocala, Florida," dated August 6, 2001, prepared for Friends Recycling, prepared by Hydrologic Associates U.S.A., Inc. is still applicable and is being included by reference.

2.3.1.2 A revised monitoring plan is included as an attachment to this report, titled "Proposed revised groundwater monitoring program, Friends Landfill, Ocala,

Florida”, addressed to Mr. F. Thomas Lubozynski, P.E., dated October 3, 2007, prepared by Hydrologic Associates U.S.A., Inc., signed by Bradley G. Waller, Principal Hydrologist.

2.3.2 Also included in this submittal for permit renewal are water quality monitoring reports, as described below.

2.3.2.1 Four Period Technical Report
Second Half 2011 through First Half 2013
Friends Recycling (FKA Big D Roofing, Inc.)
Robert M Couch, III, PE, Enviro-tech, Inc.
January 20, 2013

2.3.2.2 Semi-annual monitoring report
First Half 2013
Friends Recycling (FKA Big D Roofing, Inc.)
Robert M Couch, III, PE, Enviro-tech, Inc.
January 20, 2013

2.4 Facility and Cell Design

2.4.1 Design Life

2.4.1.1 The actual life depends on the amount of debris being accepted, which is closely related to economic activity. During the aftermath of hurricanes in 2005, this site proved to be a valuable asset to the community and the disposal rate increased significantly, although for a short period of time.

The economic downturn after 2008 drastically reduced the amount of waste being received, thus making an impact on the estimated life of the facility.

2.4.1.2 Available Volume Calculations: The facility has been in operation for several years, including operation under Big D Roofing and Ocala Recycling. Disposal has taken place on Cell #1 and Cell #2. In order to determine the remaining volume available for fill, GDC used 3-dimensional digital terrain models (DTM).

DTM #1 was created from the topographic survey prepared by REC, titled “A Topographic Survey for Friends Recycling, L.L.C.”, dated 12-21-12, representing the existing topography (benchmark surface), and modified to have a proposed flat bottom for Cell 2 at elevation 64.00 NGVD. DTM 2 was created from the proposed topography shown in the Closure Plan, prepared by GDC, included in this report.

Using AutoDesk’s Land Desktop software, both surfaces were subtracted to obtain the remaining volume available for disposal, VAD = 478,000 cubic yards (CY).

2.4.1.3 Waste Disposal and Compaction Rates: The average delivery of waste to the facility is 600 cubic yards (CY) per day, 5 days/week, or 3,000 CY/week. Normal compaction rate for waste is 3:1, but Friends Recycling is experiencing 4:1, most likely due to their recycling operations and the type of waste they are receiving. Recycling operations involve delivery of non-permitted waste to the county landfill (approx. 30 CY/week) and metal recycling (approx. 200 CY/week). The net amount of waste placed in the cells is computed as $3,000 / 4 = 750$ CY/week.

2.4.1.4 The design life was then calculated as follows:

$$478,000 / 750 = 637 \text{ weeks} / 52 = \underline{12.25 \sim 12 \text{ years}} \text{ from today at current rate.}$$

2.4.2 Disposal Area

2.4.2.1 The triangular configuration of the two primary cells (Cell #1 and Cell #2) was made necessary by the presence of a gas transmission pipeline and its associated easement.

2.4.2.2 After the original permit dated November 1, 2002, the overall cell design and distribution was changed due to the elimination of the gas main easement which divided both Cells, and also due to new setback requirements for disposal cells. The old gas easement through the property was replaced by a new 30-foot easement along the west and south property boundary.

2.4.2.3 Approval of the 1st renewal permit dated July 30, 2008, required changes to the disposal units layout. Primary cells #1 and #2 were further divided into sub-cells to differentiate the type of waste allowed. Due to off-site potable water well setback requirements, sub-cells 1B, 2B and 2C are not permitted to receive regular C&D waste, only clean debris as defined by DEP permit conditions, to include concrete, rubble.

2.4.2.4 The application for permit renewal for Friends Recycling, LLC, does not seek changes to previously approved cell layout, nor additional construction.

2.4.2.5 Topographic surveys and water management district permit referenced later on this report, indicated that this facility is not located within a 100-year flood plain.

2.4.2.6 This C&D disposal cell layout remains unchanged from the active permit for which renewal is sought. The setbacks shown are previously approved, which represent a mix of old and more current setback requirements, which were base in part on significant "historical waste" disposed under previous permits. No change is sought from the previously approved setbacks and cell layout.

2.4.2.7 Cell #1

Located east and north of the old gas easement, showing no significant change from the last permitting cycle. Cell #1 is divided into sub-cells 1A and 1B, of which only Cell #1A is currently permitted to receive waste. As of this application for permit renewal, no waste is being disposed within Cell #1A.

Cell #1 (including 1A & 1B) serves as access and a staging area for waste to be sorted and disposed off in Cell #2.

2.4.2.8 Cell #2

Cell #2 is located south and west of the old gas easement, generally south of Cell #1. Cell #2 is made up is sub-cells 2A, 2B and 2C. Sub-cells #2B and 2C may only receive clean debris and are no permitted to receive waste at this time.

Only Cell #2A is receiving waste as of this application for permit renewal. No changes are proposed at this time.

2.4.3 Currently Permitted Areas

2.4.3.1 At the time of this application for permit renewal of the Friends recycling, LLC C&D Debris Disposal facility, the following cells have been permitted to receive waste.

SUMMARY OF PERMITTED DISPOSAL UNITS AS OF JANUARY 28, 2013			
UNIT	PERMITTED TO START RECEIVING WASTE	ACTIVE	DEP RESTRICTIONS
CELL #1A	YES	NO	None. May receive regular waste.
CELL #1B	YES	NO	Yes. May only receive clean debris.
CELL #2A	YES	YES	None. May receive regular waste.
CELL #2B	NO	NO	Yes. May only receive clean debris.
CELL #2C	NO	NO	Yes. May only receive clean debris.

2.4.4 Sequence of Work

2.4.4.1 Cell #1 is to be partially filled to a maximum elevation 112.00 NGVD before proceeding to Cell 2. This elevation allows access to Cell #2 through Cell #1, and it allows Cell #1 to serve as a staging area for disposal operations in cell #2.

2.4.4.2 Cell #2A shall continue to receive waste until it matches the elevation of Cell #1, not to exceed 112.00 NGVD.

2.4.4.3 Friends Recycling, LLC shall apply for a construction permit to prepare Cells #1B, #2B and #2C to receive waste. These sub-cells shall be filled to reach parity with Cells #2A and #1A.

2.4.4.4 At the time all cells reach an elevation of 100.00 feet NGVD partial construction of the proposed drainage plan, contained in the Closure Plan, shall be constructed to manage storm water runoff from the site. This may take place sooner depending on actual site conditions.

A Florida licensed professional engineer shall be retained to establish the specific requirements for the partial implementation of the final drainage plan, in order to suit the field conditions at the time the threshold described above is reached.

2.4.4.5 The attached Cell Layout Drawing contains a waste boundary line indicating the approximate limits of the existing waste as of the date of this application for permit renewal.

2.4.5 Design Height

The target height of the landfill is sixty (60) feet above the lowest original surface level along the property perimeter. Based on the survey furnished to GDC by the client, the maximum elevation of the site upon closure is 130 feet NGVD. This maximum elevation remains unchanged from the last permitting cycle.

2.5 Wells

Friends Recycling, LLC, contracted with Robert L. Rogers Engineering Company to locate all private wells within 500 feet and all public wells within 1000 feet from the disposal areas. The result of their survey is shown on the 8.5"x11" drawings labeled "A Well Survey", dated 12-11-07, included by reference only. Guerra Development Corporation (GDC) has taken that drawing and augmented the information by adding a table showing more information for each specific well and showing relevant project features; this is shown in the drawing titled "Well Map", dated 1-10-08, included by reference only.

2.5.1 On-site Wells

2.5.1.1 Monitoring Wells

At the time of the previous application for permit renewal (for permit SO42-0019600-007, dated July 30, 2008), DEP required the closure of monitoring wells located within the waste footprint. As of this application for permit renewal, there are no open monitoring wells located within the waste footprint.

Current monitoring wells are described below, per survey by Robert L. Rogers Engineering, dated December 21, 2012.

MONITORING WELLS (December 21, 2012) Friends Recycling, LLC		
WELL NAME	WACS	TOP ELEV.
MW-1	18811	74.66
MW-5	22912	88.01
MW-6	22913	78.05
MW-7	22914	88.67
MW-8	22915	71.17
MW-9S	22916	68.64
MW-9D		68.58

2.5.1.2 Other

In addition to monitoring wells, there is a water well labeled well #19 (Per "Well Map" drawings prepared by GDC, dated 1/10/08, included by reference only), which is not used for drinking but for washing equipment, flushing toilets and other non-potable uses.

The operator is hereby required to label this well and all water outlets from this well as “Not For Drinking Water” or similar sign.

2.5.2 Off-site Wells

Well discussed in this section were located on the drawings titled “A Well Survey”, prepared by Robert L. Rogers, Engineering, dated 12/11/07, included here by reference only.

2.5.2.1 Wells #1, 2, 3, 15

These wells are a private well, located 500 feet or more from the nearest portion of the disposal cells #1 or #2. These wells meet requirements from Rule 62-701.300(2)(b).

2.5.2.2 Wells #4 Through #14, #16 and #18

2.5.2.2.1 Wells #4 through #14 and #16 are private wells, located within the 500 foot setback from the nearest point of Cells #1 and #2, and their setbacks are shown in the setback envelope. Only clean waste will be placed in cells within the well setback envelope.

2.5.2.2.2 Well #18 is a community water system owned and operated by Marion Utilities, (352) 622-1171, serving a portion of the Golden Holiday mobile home park.

The 1000' setback affects both cells as they converge at a point on the southeast corner of Friends Recycling. Sub-cells 1B and 2C have been created to allow only clean waste within the well setback for #18.

2.5.3 Well Setback Discussion

As a result of requirements set forth by DEP during the previous permit renewal cycle, sub-cells 1B, 2B and 2C were created to address the encroachment of these cells into well setbacks. These cells have been designated to receive “Clean Debris” only.

As discussed earlier in this report, monitoring wells which were located within the limits of waste have been abandoned on accordance with requirements set forth by DEP. New monitoring wells (6, 7, 8, 9s, 9d) were installed so that all monitoring wells are located outside of the waste boundaries.

3 SURVEYS

A survey of the parcels comprising the project has been made by Robert L. Rogers Engineering, in accordance with Rule 62-701-730(2). The information provided by said survey was the basis for the engineering design and report for this project. The surveys have been depicted on the following documents:

- “A Boundary Survey For Friends Recycling, L.L.C.,” dated 12 / 21 / 12, prepared by Rogers Engineering, Inc., included in this report.
- “A Topographic Survey For Friends Recycling, L.L.C.,” dated 12 / 21 / 12, prepared by Rogers Engineering, Inc., included in this report.
- “A Well Survey for Friends Recycling, L.L.C.,” dated 12-11-07, prepared by Robert L. Rogers Engineering, included by reference only.

4 OPERATION PLAN

4.1 General

This plan has been prepared to meet requirements set forth by Rule 62-701.730(7). Upon approval by FDEP, a copy of this document shall be issued to the owner / operator. This document shall be kept at the facility at all times and shall be made available for inspection by agencies having jurisdiction over this facility.

4.2 Facility Operations

The facility is allowed to operate during normal business hours, 7:00 a.m. to 6:00 p.m., Monday-Friday. Disposal of waste shall be done in a manner consistent with section 2.4.3, Sequence of Work.

The active cell may be excavated to a depth **not lower than elevation 64.0 NVGD**. The excavated fill may be used for berms and to fill depressions which may be lower than elevation 64.00 NGVD. Excavated clays may be stored in an inactive area of the site. Part of the excavated material shall be reserved for "closing" of the facility, which involves a 24" soil cap. The operator is hereby required to exercise care during excavation to ensure that excavation does not breach any clay layer which may separates the perched water table from the Floridan aquifer below the depth of 64.00 NGVD.

The incoming debris shall be dumped on the cell itself, or on an adjacent permitted cell, designated also as roving sorting area, where it shall then be spread with the tracked dozer or front-end loader. Once the debris has been spread, segregation of the material is done by hand by one (1) trained spotter per each independent dumping area. The trained spotter duties may also be discharged by an interim spotter or trained operator or interim operator, as described in the Definitions subsection of the Training Section in this report.

The material shall be segregated into three categories, namely -- non-permitted putrescible, non-permitted non-putrescible and permitted C & D waste to be disposed off on-site. Non-permitted waste shall be placed in the dumpsters dedicated for each type of waste. The two (2) dumpsters for non-permitted waste shall be handled as described in section "Temporary Storage" of this report. Waste leaving the site shall be delivered only to facilities approved to handle the specific type of waste being delivered.

After segregation of non-permitted waste, the allowed waste is pushed to the final disposal area and compacted by the tracked loader.

A small area, near on-site non-potable well #19 has been dedicated for recycling operations by an independent operator, Waste Pro, Inc. No waste from this stream is disposed of in Friends Recycling, LLC cells or handled by their personnel.

4.2.1 Prohibitions (Rule 62-701.300)

The storage, processing and disposal of waste within this facility shall be in accordance with conditions set forth by all permitting regulatory agencies, including the Florida Department of Environmental Protection (FDEP), the Saint Johns River Water Management District (SJRWMD). Operations must comply with applicable sections of FDEP rule 62-701, "Solid Waste Management Facilities".

- 4.2.1.1** Open burning of solid waste is prohibited except in accordance with rule 62-701.300(3).

- 4.2.1.2** Hazardous waste, Bio-hazardous waste and or liquids containing polychlorinated biphenyl (PCB) are specifically prohibited from acceptance and/or disposal.
- 4.2.1.3** The following items and/or materials shall not be disposed-of on this site:
- Buckets or cans containing tar, paint, solvents, glue, or other liquids
 - Lead-acid batteries
 - Used oil
 - White goods
 - Whole waste tires
 - Noncontainerized liquids
 - Containerized liquids
 - Containers or tanks 20 gallons or larger in capacity, unless these have one end removed or punctured enough to ensure that they are not holding any liquids.
 - Other materials which are not listed here may be listed in the Rule 62-701, or related rules.
 - Pressure treated or creosote-treated or CCA-treated wood and/or products.
 - Gypsum Wallboard
- 4.2.1.4** Hazardous materials, fuels, solvents, lubricants, etc. and other maintenance materials, shall be stored in a secured area near the office, away from the disposal and sorting areas.
- 4.2.1.5** Friends Recycling, LLC has voluntarily removed Gypsum Wallboard from the list of materials to be disposed-of on-site as part of the Odor Management Plan. Small amounts of Gypsum Wallboard which may be embedded in C & D waste which may be impractical to remove and sort out, may still be disposed-of “un-shredded” on-site.
- 4.2.1.6** The Operator shall comply with the treated wood section of this report, which specifies the management and disposal of such materials.
- 4.2.1.7** Cells 1B, 2B, and 2C are not permitted to receive normal C & D waste. Only clean debris consisting of rubble, brick, glass and concrete is allowed until DEP issues a permit modification to receive normal waste.
- 4.2.1.8** Waste material from a waste processing facility which is mixed with Class I or Class III waste, either before or after processing, is not considered construction and demolition debris and may not be accepted for disposal at a construction and demolition debris disposal facility

4.2.2 Materials Allowed

Only inert waste generated by construction and demolition activities, generally considered to be not water soluble and non-hazardous in nature shall be accepted for disposal in this site. These materials include:

- Steel
- Glass
- Brick
- Concrete

- Asphalt material
- Pipe
- Lumber
- Carpet remnant material from C & D activities or from carpet manufacturers
- Rocks, Soils, Vegetative cover, trees and tree remains.

Carpet remnants which are from a construction or demolition project may be accepted at the facility. Plastic buckets which are empty at the time of delivery to the site may be accepted for disposal at the facility.

4.2.3 Management of CCA And Other Treated Wood

- 4.2.3.1 Friends Recycling, LLC, shall not accept waste containing woods treated with CCA, Creosote or Pressure Treated wood ("Treated Wood").
- 4.2.3.2 Friends Recycling, LLC, shall notify their established clients that this facility does not accept Treated Wood. Notification shall take place in the form of a certified form letter, copy of receipts kept on-file at the offices for Friends Recycling, LLC.
- 4.2.3.3 New clients shall be notified of these restrictions by copy of the form letter indicating so.
- 4.2.3.4 Friends Recycling, LLC personnel shall be instructed by the operator of these restrictions, of methods to help identify and handle suspect material, by making available to them the "Guidance for the Management and Disposal of CCA-Treated Wood" (Attachment - 9). This guidance document is made required reading by new personnel and is made part of this report by reference and as an attachment.
 - 4.2.3.4.1 Incoming trucks should be visually inspected to look for dedicated loads of treated wood, specially from contractors specializing in the demolition of fences, decks and docks. The name of the company may help identify contractors who would be likely to have a dedicated load. For additional information, the scale operator shall ask the driver what they are hauling. All dedicated loads shall be diverted at the scale house for disposal at a lined facility.
 - 4.2.3.4.2 A trained operator or spotter must inspect the load and pull out suspect pieces of treated wood. Separated wood should be placed in a roll-off container for disposal at a lined disposal facility.
 - 4.2.3.4.3 Trained operators and spotters shall identify suspect wood by looking for smells, coloring, dimensional lumber, posts, loads of wood associated with hardware related to fences, decks, docks and piers.
- 4.2.3.5 These instructions for handling of treated wood shall be construed to ONLY apply when handling small amounts of Treated Wood inadvertently received among other C&D waste. Large amounts shall be mechanically reloaded onto the originator's vehicles.
- 4.2.3.6 When spotting, sorting and storing (for disposal offsite) Treated Woods, personnel shall be equipped with chemical-resistant gloves adequate for CCA, Creosote and other chemicals used in treating pressure-treated wood.

- 4.2.3.7 When handling Treated Wood, personnel shall wear sufficient clothing to prevent skin contact. In case of skin contact, the area coming in contact shall be washed thoroughly with soap and water.
- 4.2.3.8 Spotters shall sort out wood identified as Treated Wood, to be stored separately from other recyclable materials, and to be hauled for disposal off-site at a facility authorized to receive this waste.

4.3 Emergency and Contingency Plan

4.3.1 Fire

Accidental fires, although unlikely, are possible. However, the most likely type of fire is one which is deliberately set. The following guidelines have been developed to minimize the potential for fires and the spreading of said fires to surrounding properties.

- 4.3.1.1 An earth embankment generally six (6) foot in height, as shown in the drawings, shall be constructed along the perimeter of the parcels used for disposal. The space between the property line and the top of the berm shall be used as a buffer around the property in order to retard any eventual incendiary occurrence. The buffer zone shall be kept free of vegetation and debris at all times (except sod and mowed grass).
- 4.3.1.2 The vegetative screen, provided to buffer surrounding properties from noise, and visual pollution, shall be located on top of the berm.
- 4.3.1.3 Equipment capable of moving large amounts of dirt shall be maintained on-site and in working condition for use in putting fires out or creating new fire break lanes. The same front-end loader used for spreading and compacting the waste may be used for this purpose.
- 4.3.1.4 A chainlink fence shall be provided as shown in the drawings to supplement the barrier effect provided by the berms. The gates to the site shall be kept locked at all times when the facility is not being operated.
- 4.3.1.5 The owner / operator shall post outside the portable office and inside by the telephone, the telephone numbers for applicable emergency agencies having jurisdiction over the facility, such as 911, police, fire department. See Section 4.3.4 of this report.
- 4.3.1.6 A working telephone shall be available at all times during operation of the facility. Additionally, at least one working cellular telephone shall be available outside the office building, to be used by the trained operators or trained spotters in the event line telephone service at the office is down.
- 4.3.1.7 Within 24 hours of a fire affecting the facility, the Operator shall contact DEP by phone call, e-mail, or facsimile. Additionally, a letter must be submitted within five days to the Department describing how the fire began, what was done to extinguish it, and what will be done to prevent future fires.

4.3.2 Health and Injury

The operator shall be responsible for conducting the operation of this site at all times in accordance with OSHA and other applicable safety provisions.

The following minimum safety measures shall be taken:

- 4.3.2.1** The equipment operator (spotter, driver and or front end loader operator) shall have access within the site to two-way communication with the main office. Cellular telephones or other type of radio telephone would be acceptable.
- 4.3.2.2** A First Aid Kit shall be available at the site during operations. The first aid kit can be placed in the front end loader and or the vehicle used to travel to the site. A more comprehensive First Aid Kit shall be located inside the project office.
- 4.3.2.3** A written notification shall be sent by the Owner and/or Operator of the facility to emergency management entities, such as Police, 911, Fire Department. The notification shall include as a minimum, the telephone number, address, name of business, contact person, directions for access to the site and the type of work conducted within the site.

4.3.3 Sinkhole Formation

Upon the discovery of a sinkhole, the permitted owner / operator for the facility shall notify the following entities:

- Engineer of Record: Guerra Development Corp. (352) 629-8060
- St. Johns River Water Management District (386) 329-4500
- Department of Environmental Protection, Solid Waste (407)-897-4100

4.3.4 Emergency Contacts

The Operator shall post in a conspicuous place within the facility office a list of emergency contacts, which shall be updated on a monthly basis, containing as a minimum, the following contacts:

- DEP Receptionist - Central District (407) 897-4100
- City of Ocala Fire Department 911 Emergency or 629-8513 Non-emergency
- City of Ocala Police Department 911 Emergency or 369-7070 Non-emergency
- Guerra Development Corp. (352) 629-8060
- St. Johns River WMD (386) 329-4500
- Gerald Lourenco, Operator (352) 266-9497

4.3.5 Severe Weather

- 4.3.5.1** This section applies to approaching weather such as hurricanes and tropical storms, as well as, the aftermath of tornados and design-level rainfall events (100-year 24-hour storms).
- 4.3.5.2** Within 72-hours of an expected hit by severe weather:

- 4.3.5.2.1 Emergency numbers shall be verified.
- 4.3.5.2.2 Communication tools such as land lines and cellular phones shall be checked.
- 4.3.5.2.3 Essential supplies (equipment fuel, spares, bottled water) shall be topped off.
- 4.3.5.2.4 The Facility Operator/Manager shall hold a meeting with facility personnel to discuss actions to be taken.

4.3.5.3 Within 48 hours of an expected hit by severe weather:

- 4.3.5.3.1 Dumpsters for recyclable material and for non-C&D waste shall be lawfully emptied.
- 4.3.5.3.2 All waste which may become airborne shall be promptly covered with dirt.
- 4.3.5.3.3 All equipment, parts, tools, etc. which may become airborne shall be properly secured.
- 4.3.5.3.4 All components for the drainage system (ditches, swales, pipes, inlets, etc.) shall be verified to be in proper working conditions.

4.3.5.4 Within 24 hours of an expected hit by severe weather:

- 4.3.5.4.1 Mr. Gerald Lourenco, Facility Operator/Manager shall make the determination for shutting down.
- 4.3.5.4.2 Upon shutting down, no additional waste shall be received.
- 4.3.5.4.3 Fuel tank shall be secured, shed access shall be locked and power to the fuel pump disconnected.
- 4.3.5.4.4 All gates to the facility shall be locked.
- 4.3.5.4.5 Emergency contact information, visible from outside of the facility shall be verified.

4.3.5.5 After severe weather has passed:

- 4.3.5.5.1 Mr. Gerald Lourenco, Facility Operator/Manager shall make the determination for re-opening the facility.
- 4.3.5.5.2 An inspection of the facility shall be made under Mr. Lourenco's direction.
- 4.3.5.5.3 If any significant damage is observed Friends Recycling shall retain a licensed professional engineer to assess if the damage may affect permit conditions, and to take appropriate action.
- 4.3.5.5.4 In the event of damage which may affect permit conditions, either Mr. Lourenco or by delegation, the retained licensed professional engineer shall notify DEP of the damage and remedial actions to be taken. This notification to DEP shall be made within 72 hours (or as soon as practical) of the event.

4.4 Site Resources List

4.4.1 Personnel

The owner / operator of the facility intends to continue with the operational practices used in the currently permitted facility.

- A secretary at the portable office.

- Owner / operator, facility manager.
- Two (2) trained operators using the heavy equipment (dozer or front-end loader).
- Two (2) trained spotters.

The trained operator using the heavy equipment to spread the waste once is received may act as a trained spotter upon spreading the waste. Operators and spotters shall be trained as described in this report, per chapter 62-701-730(8).

4.4.2 Equipment

Three Rex compactors, one 4-wheeler, two front-end loaders, one excavator 330 LC, one skid steer 252B Caterpillar, one D25D off-road truck John Deere, top grinder for trees and branches, one 4000-gallon water truck.

4.5 Compaction, Grading Schedule, and Maintenance

Waste shall only be placed on each cell after it has been spread, visually spotted for non-permitted material and segregated (if applicable). Acceptable waste shall be placed in the cells in 12-inch layers. Then it shall be compacted by at least two (2) passes with the front-end loader or two (2) passes with the tracked bulldozer.

Slope of waste disposal shall be kept at a maximum slope of 3:1 (horizontal:vertical) and any erosion shall be promptly fixed.

The drainage swales, berms and other storm drainage system elements shall be kept free of debris, graded in accordance to approved plans and covered with grass or sod to minimize erosion. Failure to maintain the storm drainage system may result in flooding and damage to outside property.

Refer to the Closure & Grading Plan, dated 1-10-08, for final grading for each cell.

4.6 Site Access Control

The facility shall be surrounded by an access barrier, as indicated on the drawings, made up of earth berm and/or chain link fence. The entrance to the facility shall be gated, and the gate shall be locked when the facility is not open for business or unsupervised. The entrance gate shall have a sign showing the name of the facility and a telephone number for normal and off (emergencies) business hours. The drainage retention area (DRA) shall be enclosed with chainlink fence in its entirety. Upon facility closure, install an uninterrupted 6-foot high chainlink fence along the entire perimeter of the facility.

4.7 Minimum Waste Inspection

As described on Rule 62-701.730(7)(d), at least one spotter must be on duty to inspect the waste as it is delivered prior to final placement in the cell. See Operation Plan for additional information.

4.8 Nuisance Control

Proposed location and size of the cells minimize the potential for nuisance to the surrounding areas.

4.8.1 Odors

The type of waste being received at the site, construction debris, minimizes the potential for foul odors as well as animal life nuisance. However, C&D facilities have the potential for the generation of odors.

Primary sources for odor are non-permitted waste, gypsum wallboard, decomposing organic material such as mulch, grass, branches, and other yard waste.

Friends Recycling, LLC, has been made aware by DEP of complaints regarding nuisance odors. The management of the facility has been unable to confirm the severity and frequency of the odors as reported.

Friends Recycling, LLC, operates the C&D facility in a responsible manner and in compliance with the C&D Solid waste permit. Friends Recycling, LLC, will undertake additional measures to mitigate and manage odors which may be emanating from the facility.

Refer to the Odor Management Plan, contained in a subsequent section of this report.

4.8.2 Noise

Operations will continue as they have, with working hours from seven (7) a.m. to six (6) p.m., Monday through Friday. The proposed berm is intended to provide visual as well as noise protection.

4.8.3 Litter

The engineering drawings call for the site to be surrounded by a six (6) foot high berm and a fence. This will minimize the potential for debris such as paper or other like light-weight items to be blown to surrounding properties; The only source for such debris will be the sorting area.

During cell operations above original ground level, the operator shall inspect the surrounding areas outside the project on a monthly basis to ensure that debris and litter is not being blown beyond the project. Any project litter found must be collected by the operator.

The operator is hereby required to maintain a clean project site free of litter. Periodic clean up runs, not to exceed one month (or sooner if needed) are required as a measure of good management practice, and it should encompass the entire site. Daily pick-up of minor litter items is encouraged.

4.9 Storage of Petroleum and other Maintenance Materials

The increase in operating equipment has required the installation of on-site fuel storage. A single 500-gallon above-ground tank is housed inside a secured shed. This shed shall be kept locked during non-operating hours.

4.10 Regulated Hazardous Waste

Upon discovery of regulated hazardous waste in the Friends Recycling facility, the operator shall undertake the following actions.

- Notify the department of the material and estimated quantity found.
- Notify the person and/or entity responsible for shipping the waste, if the identity can be ascertained.
- Notify the generator of the waste, if the identity can be ascertained.
- Cordon off the area where the waste is deposited.
- Undertake the work to cleanup, transport and dispose of the waste at a permitted hazardous waste management facility.
- Notify the department when the cleanup and disposal operations have been completed

4.11 Recycling

Recycling of materials contained in the construction and demolition debris waste stream is allowed under this permit [62-701.730(13)]. The following materials may be recycled: Aluminum, dimensional lumber, plastics, concrete and masonry, steel, gypsum wallboard.

No soil, recovered fines or screened materials shall be accepted for recycling under this permit at this facility. These materials may be disposed of in this facility so long as they are placed in the cells in accordance with the conditions of this permit and so long as they are placed under at least two (2) feet of cover material.

The recycling operation consists of a spotter inspecting the waste as it is being spread by the dozer or front end loader. Material to be recycled is segregated by the spotter and then deposited in bins or recycling dumpsters in accordance with type of material.

Trees and other wood debris originating from the construction and demolition debris waste stream are passed through the top grinder and converted into mulch. This area is mobile and it is relocated as needed to allow the disposal operation to take place.

4.12 Reporting

The owner or operator of the facility shall submit a report to the Florida Department of Environmental Protection, per Chapter 62-701.730(12) F.A.C.

The report shall be submitted on form 62-701.900(7) (enclosed) annually no later than April 1 of each year, and it shall cover the previous calendar year (January 1st to December 31st).

It shall be the responsibility of the owner/operator to verify with the DEP any changes to the form, frequency or other aspects of the reporting requirements for this facility.

The report shall contain information which includes a summary of the amount and types of waste disposed of or recycled, the county of origin of materials which are recycled or a statement that the county of origin is unknown.

5 CLOSURE PLAN

- 5.1** Closure of the facility will involve capping the remaining landfill cell areas, grading the site, seeding/grassing and providing the drainage facilities as indicated on the Closure and Grading Plan, prepared by GDC, dated 1-10-01, updated January 28, 2013, submitted as part of the engineering drawings.
- 5.2** At least 90 days prior to the date when waste will no longer be accepted, the owner or operator of Friends Recycling, LLC, shall submit an updated closure plan to DEP to reflect any changes in the closure plan due to actual operational conditions at the facility.
- 5.3** Final cover and seeding or planting or vegetative cover shall be placed on each disposal cell within 180 days after it has reached its final grade. The final cover shall consist of a 24-inch thick soil layer , the upper 6 inches of it shall be capable of supporting vegetation.
- 5.4** The landfill side slopes shall have a maximum slope of 3:1 (H:V) and shall be capped as described above. Side slopes shall be sodded.
- 5.5** Temporary closure of this facility is not anticipated. If this should change in the future, temporary closing shall be done in accordance with 62-701.730(9)©).
- 5.6** The owner or operator shall retain the services of a Florida licensed professional engineer to oversee construction and implementation of the Closure Plan. This is necessary in order for said professional to certify closure construction completion.
- 5.7** The owner or operator shall provide a certification of closure construction completion to the DEP within 30 days after closing, covering and seeding the disposal unit. Prior to that, a Florida licensed professional engineer shall be retained to review the approved proposed closure plan for applicability and to inspect the closure activities for certification.
- 5.8** The owner or operator shall provide a final survey report prepared by a Florida licensed professional land surveyor and mapper, in accordance with Rule 62-701.601(3), F.A.C..

6 FINANCIAL ASSURANCE

Financial assurance in accordance with Rule 62-701.730(11), is enclosed via separate cover.

7 PROOF OF OWNERSHIP OR CONTROL

The construction and demolition debris facility is owned and operated by Friends Recycling, LLC. The property affected by cells #1 and #2 are represented by two (2) deeds.

Deed 1: Labeled as Parcel One (Current Permit) as an attachment to the "Engineer's Report", dated October 29, 2001, prepared by GDC, on file at DEP. It is a warranty deed dated April 25, 1988, from Donald E. Rose to Ocala Limerock Corporation.

Deed 2: This deed is attached to the revised Report from GDC, it includes property to the south of Deed 1, containing Cell #2 in its entirety.

Proof of ownership remains valid as originally submitted for permit . These are included by reference to the original permit No. SO42-0019600-005 for the Ocala Recycling, LLC, C&D Disposal and Recycling (later changed to Friends Recycling, LLC), issued on November 1, 2002.

8 STORM WATER MANAGEMENT

The storm drainage system for this site has been designed to meet applicable criteria from the Saint Johns River Water Management District (SJRWMD). The system consists of a single retention pond, sized to manage the pre-post difference for a 100-year 24-hour event, with 11.5 inches of rainfall, to minimize damage to downstream properties.

The design shown in the drawings are for the closure state of the facility. During the operation of the facility, prior to closure, partial construction of the drainage facilities are allowed so long as no runoff exits the facility's property for up to a 25-year 24-hour storm.

The approved permit from the SJRWMD is No. 40-083-43631-2, Issued April 26, 2002, authorized by Kenneth A. John.

9 TEMPORARY STORAGE

The spotter for the project is charged with inspecting and sorting the waste. All non-permitted waste shall be segregated away prior to final placement and compaction in the cell.

Two (2) dumpsters (minimum) shall be provided within 100' of the active cell. One will receive the putrescible material, which must be emptied within 48 hours of receiving waste. The other will receive non-putrescible waste, and will be emptied as needed, but not to exceed 30 days after receiving waste.

The dumpsters shall be placed adjacent to the stabilized driveway to permit the garbage truck to have access. These dumpsters shall be relocated as needed, as the project progresses.

10.1 General

This section is included as required by Chapter 62-701.320(15) to ensure adequate training of personnel operating the construction and demolition debris disposal facility. It shall be the responsibility of the facility operator, as identified on the permit, to comply with all applicable provisions from chapter 62-701.320(15), as augmented and supplemented in this report.

The owner and/or operator of the Friends Recycling LLC construction and demolition debris disposal facility shall not employ a person to perform, nor may any person perform, the duties of an operator or spotter at such facility unless that person is a trained operator or a trained spotter, or an interim operator or interim spotter.

10.2 Definitions

- 10.2.1 **“Operator”**: Any person, including the owner, who is principally engaged in, and is in charge of, the actual operation, supervision, and maintenance of a solid waste management facility and includes the on-site person in charge of a shift or period of operation during any part of the day, such as facility managers, supervisors and equipment operators. A trained “operator” may perform the duties of a trained “spotter”.
- 10.2.2 **“Interim Operator”**: Any person who has, in the opinion of the facility manager, shown competency in his chosen occupation through a combination of work experience, education and training and who has at least one year of experience at that facility or similar facility.
- 10.2.3 **“Spotter”**: Any person employed at a solid waste management facility whose job is to inspect incoming waste and to identify and properly manage any hazardous or prohibited materials which are received at the facility. “Spotters” shall be stationed where they can thoroughly inspect each shipment of waste for prohibited materials.
- 10.2.4 **“Interim Spotter”**: Any person who has, in the opinion of the facility manager, shown competency in his chosen occupation through a combination of work experience, education and training. An “Interim Spotter” may perform the duties of a “Spotter”, but only under the supervision of a trained “operator” or a trained “spotter”.

10.3 Training Requirements

- 10.3.1 In order to be considered trained, operators and spotters of the Friends Recycling LLC Construction and Demolitions Debris Disposal facility shall complete the following training requirements at courses described in the facility’s Operating Plan.
- 10.3.2 **Operators**: Shall complete 24 hours of initial training, and shall pass an examination as part of that training. Within three (3) years after passing the examination, and every three (3) years thereafter, operators shall complete an additional 16 hours of continued training.

- 10.3.3** **Spotters:** Shall complete 8 hours of initial training. Within three (3) years after attending the initial training, and every three (3) years thereafter, spotters shall complete an additional 4 hours of continued training.

10.4 Approved Training

- 10.4.1** All training courses, whether public or in-house, shall be approved by the DEP in accordance with Section 403.716, F.S.. A third party must administer any examination required by this sub-section for an in house operator-training program.
- 10.4.2** 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 DEP staff.
- 10.4.3** The owner and/or operator for the Friends Recycling LLC construction and demolition debris disposal facility shall obtain bi-annually a list of approved relevant training courses from the Department of Environmental Protection, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.
- 10.4.4** Until a more current list is obtained, training for personnel on this site will take place through the University of Florida TREEO Center, at the Construction and Demolition Debris Landfills: Short Course for Operators and spotters. Date and location of seminars may be found at the following address:
- University of Florida
TREEO Center (E-Mail: train@treeo.doce.ufl.edu)
3900 SW 63rd Blvd.
Gainesville, FL 32608-3848
- 10.4.5** Proof of training shall be sent to DEP - Central District office in Orlando, on behalf of Friends recycling, LLC, within 15 days of any employee completing the required training. A copy of the proof of training, such as a Certificate of Completion, shall be kept on file at Friends Recycling and shall be made available for inspection by DEP staff upon request.
- 10.4.6** The following employees of Friends Recycling have received required training. Copies of certificates are attached to this report:
- Gerald Lourenco, Operations Manager, spotter: "24-hour Intitial Course for Landfill Operators (Class I, II, III, and C&D)", February 22-24, 2006. Retake same class for renewal not later than January 2009. Spotter Training for Solid Waste Facilities, dated January 30, 2009.
 - Nick Giumarelli, Manager, Spotter, "24-hour Intitial Course for Landfill Operators (Class I, II, III, and C&D)", February 22-24, 2006. Retake same class for renewal not later than January 2009. Initial Training Course for Landfill Operators and C&D Sites, 24 hour, February 25, 2009.
 - Sonny Gilbert, Spotter, "8-Hour Training Course for Spotters at Landfills, C&D Sites and Transfer Stations", November 17, 2010.
 - Neyro Briones, Spotter, "8-Hour Training Course for Spotters at Landfills, C&D Sites and Transfer Stations", November 17, 2010.

11 LONG TERM CARE PROVISIONS

11.1 General

These provisions shall be construed as a minimum and it should not supersede any conditions set forth by permitting agencies such as DEP or the WMD. Every effort must be made to keep the site in accordance with design plans and approved permit conditions and special provisions.

11.2 Vegetative Cover

The project area shall be monitored on a bi-annual basis for erosion. Ensure that a good vegetative cover is in place over the closed cells to minimize erosion. The sod planted on the side slopes for the drainage retention area and ditches shall be mowed regularly. Any areas which have been washed out and eroded shall be re-graded and re-sodded as needed.

11.3 Erosion

Eroded areas shall be repaired promptly to minimize further damage. Re-grade and replace vegetative cover. Accumulated silts from normal drainage flow or from erosion shall be removed from ditches and DRA on a yearly basis.

11.4 Fences

The perimeter fences and gates shall be inspected on a monthly basis and repairs be effected promptly to secure the project site from unauthorized entry.

11.5 Tree Buffer Zones

Proposed perimeter tree buffer zone shall be monitored on an annual basis to ensure the normal progress of planted material. The long leaf pine planted shall be replaced as needed to maintain a continuous barrier along the project perimeter. Alternate plants may be used so long as they are of species which are expected to do well in the climate of the project site and provide similar buffering.

11.6 Cell Caps

Routine inspections should help minimize the potential for damage to the cell soil cap. However, if erosion occurs to the point that the cap has been removed or reduced in specific areas, it must be promptly returned to its design characteristics. Upon making repairs, a cap of soil suitable for vegetative growth shall be placed, to sustain a vegetative cover.

11.7 Regrading

Re-grade as necessary to maintain the final topography of the site as shown in the Closure Plan. This may be necessary due to erosion damage, settlement of the cells due to consolidation of the buried debris, etc. If sinkholes are found or develop, the project engineer and/or the water management district must be notified immediately.

11.8 Groundwater Monitoring

According to Rule 62-701.730(10), F.A.C., ground water monitoring shall be extended for a five (5) year period starting at the date of closing for the C&D disposal facility.

----- END OF MAIN BODY OF REPORT -----

ATTACHMENT 1

RESPONSE TO RULE 62-701.730 F.A.C.

RESPONSE TO C&D DEBRIS RULE 62-701.730 F.A.C.
FRIENDS RECYCLING, LLC
January 28, 2013

The intent of this part of the report is to aid the reviewer by addressing each section of the rule and stating what actions were taken or are being proposed by the applicant in order to meet the requirements set forth by the rule.

62-701.730 Construction and Demolition Debris Disposal and Recycling.

(1) Applicability.

(a) No person shall construct, operate or close an off-site construction and demolition debris disposal facility without a permit issued by the Department. All holders of construction or operation permits issued prior to January 6, 2010, that contain conditions not in conformance with this chapter shall apply for modification of the permit to conform to this chapter to the District Office of the Department that issued the permit. The submission shall occur at the time of application for renewal of an existing permit, or before July 5, 2010, whichever is earlier. For purposes of this paragraph, a permit issued prior to January 6, 2010, is deemed to include a completed permit application received by the Department prior to January 6, 2010. However, the provisions of paragraph (4)(h) of this section will not apply to any disposal units of a facility that have received a Department permit authorizing construction or operation prior to January 6, 2010.

Response to (1)(a): Friends Recycling LLC received a FDEP permit on July 30, 2008, which is prior to January 6, 2010. As such, prior approved setbacks less than 100 feet remain.

(b) After the applicable compliance deadline specified above, facilities shall operate only in accordance with the provisions of this section. However, any disposal unit that received a significant amount of waste in accordance with the conditions of its permit prior to the applicable compliance deadline is not required to comply with any siting or construction design requirements of this chapter that were not in effect prior to the applicable compliance deadline. For purposes of this subsection:

1. A "significant amount of waste" means that the disposal unit has received sufficient waste for disposal, in accordance with its normal operational plan, so that it is impractical to remove that waste or to relocate or reconstruct the disposal unit.

Response to (1)(b)1.: Friends Recycling LLC received a FDEP permit on July 30, 2008, which is prior to January 6, 2010. As such, prior approved setbacks less than 100 feet remain. These historical waste disposals are considered "significant amount of waste".

2. "Siting or construction design requirements" do not include the hydrogeological investigation required by subparagraph 62-701.730(2)(a)3., F.A.C., or the ground water monitoring plan required by paragraph 62-701.730(4)(b), F.A.C.

Response to (1)(b)2.: Hydrogeological investigation for Friends Recycling is per latest requirements set forth by paragraph 62-701.730(4)(b), F.A.C.

(2) Application. A permit application for an off-site construction and demolition debris disposal facility, disposal unit, or lateral expansion shall be submitted on Form 62-701.900(6), Application to Construct, Operate, or Modify a Construction and Demolition Debris Disposal or Disposal with Recycling Facility, <http://www.flrules.org/Gateway/reference.asp?No=Ref-01485>, effective date August, 2012, hereby adopted and incorporated by reference. Copies of this form are available from a local District Office or by writing to the Department of Environmental Protection, Solid Waste Section, MS 4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. The application shall be in conformance with the requirements of subsections 62-701.320(5), (6), (7), and paragraph (8)(a), F.A.C. All applications shall include the information in paragraphs (b) through (f) of

this subsection, and applications to construct or laterally expand a disposal unit shall also include the information in paragraph (a) of this subsection.

Response to (2).: A permit application is being submitted on Form 62-701.900(6). Additionally, the application is NOT for lateral expansion or construction, thus section (2)(a) does not apply, however, some of this information is being included to centralize and update previously submitted information.

(a) An engineering report, signed and sealed by a professional engineer, that includes:

1. A site plan, of a scale not greater than 200 feet to the inch, which shows the project location and identifies the proposed disposal units, total acreage of the site and of the proposed disposal units, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, and potable water wells on or within 500 feet of the site;

Response to (2)(a)1.: An updated site plan as described above is included although not required.

2. A geotechnical investigation which meets the criteria of Rule 62-701.410, F.A.C.

Response to (2)(a)2.: Geotechnical investigation report is included by reference only

3. A hydrogeological investigation which meets the criteria of paragraphs 62-701.410(1)(a) and (c), F.A.C.;

Response to (2)(a)3.: A hydrogeological report is included by reference only.

4. An estimate of the planned active life of the facility, the design of the disposal areas, the final design height of the facility, and the maximum height of the facility during its operation;

Response to (2)(a)4.: The above information is included in the revised report and supporting drawings.

5. Documentation that the facility location will comply with the requirements of paragraphs 62-701.730(4)(g) and (h), F.A.C.

Response to (2)(a)5.: As discussed above, the setback requirements per 62-701.730(4)(h) do not apply to this C&D facility's "historical waste", placed under approved permits prior to January 6, 2010 and with volumes considered "significant waste". Regarding 62-701.730(4)(g), 100-year Flood plain requirements were met by the original designs approved by permits dated November 1, 2002 and July 30, 2008. Physical characteristics of the off-site drainage basin have not changed, and the 100-year flood plain has not changed.

(b) A boundary survey, legal description, and topographic survey of the property;

Response to (2)(b): The required boundary survey, legal description and topographic survey are included.

(c) An operation plan which describes how the applicant will comply with subsection 62-701.730(7), F.A.C., which must include procedures for emergency preparedness and response as required in subsection 62-701.320(16), F.A.C.;

Response to (2)(c): An updated operation plan, made part of the Engineer's Report, is included with this renewal application.

(d) A closure plan that describes how the applicant will comply with subsections 62-701.730(9) and (10), F.A.C.;

Response to (2)(d): An updated Closure Plan has been included in this submittal for a permit renewal.

(e) The financial assurance documentation required by subsection 62-701.730(11), F.A.C.; and

Response to (2)(e): An new cost estimate has been prepared for this renewal application and financial assurance documents will be revised to reflect this cost estimate upon approval of the permit renewal.

(f) The CCA treated wood management plan as required in subsection 62-701.730(20), F.A.C.

Response to (2)(f): An updated Operation Plan includes a section titled "CCA Treated Wood Management" to address the requirements of this section.

(3) Certification. Certification of construction completion shall be done in accordance with paragraph 62-701.320(9)(b), F.A.C.

Response to (3): N/A This application for renewal DOES NOT include lateral expansion or construction.

(4) Other requirements. Except as specified in this section, the requirements of Rules 62-701.330 through 62-701.630, F.A.C., do not apply to construction and demolition debris disposal facilities.

(a) The Department shall not require liners and leachate collection systems at individual facilities unless it demonstrates based upon the types of waste received, methods for controlling the types of waste disposed of, the proximity of ground water and surface water, and the results of the hydrogeological and geotechnical investigations that operation of the facility is reasonably expected to result in violations of ground water standards and criteria otherwise. If the Department determines that a liner and leachate control system may be required, it shall notify the applicant within 30 days of receipt of the information which forms the basis for such a determination. The applicant may either submit additional information, redesign the facility to include a liner and leachate collection system, or demand that the Department process the application without such additional information or redesign.

Response to (4)(a): A full technical report on water quality monitoring was prepared for this renewal application. According to this report, Friends Recycling, LLC is in compliance with ground water standards, thus section 62-701.730(4)(a) is not applicable at this time.

(b) A water quality monitoring plan that meets the criteria set forth in Rule 62-701.510 and Chapter 62-520, F.A.C., shall be included with the permit application, and shall be implemented and maintained by the owner or operator, with the following exceptions:

Response to (4)(b): A full technical report on water quality monitoring was prepared for this renewal application.

1. If no disposal unit is constructed with a liner and leachate collection system, then leachate sampling is not required.

Response to (4)(b)1.: There are no cells with liners in this facility and based on results of the sampling results, requirements of liners in not expected , thus leachate sampling is not performed.

2. Unless a disposal unit is constructed or operated within 200 feet of a surface water body, or unless site-specific conditions could reasonably be expected to result in contaminants entering a surface water body, surface water sampling is not required. For purposes of this subparagraph, a surface water body does not include a body of water contained completely within the property boundaries of the disposal site that does not discharge from the site to surface waters.

Response to (4)(b)2.: There are no surface water bodies within 200 feet of the cells for this facility and there is no indication at this time that contaminants from this site may enter a surface water body outside of the 200 foot radius. Thus, sampling of surface water bodies does not apply.

3. The well spacing requirements of subparagraph 62-701.510(3)(d)3., F.A.C., do not apply. A minimum of one upgradient and two downgradient wells is required, as specified in Chapter 62-520, F.A.C.

Response to (4)(b)3.: The well spacing for this facility was set forth during the previous permit renewal process, permit approved July 30, 2008. The drawings and topographic surveys included in this permit renewal application identify the location of approved active wells.

4. Detection wells shall be sampled and analyzed at least semi-annually for the following parameters:

Field Parameters	Laboratory Parameters
pH	Aluminum
Turbidity	Chlorides
Temperature	Nitrate
Specific conductivity	Sulfate

Dissolved oxygen	Total dissolved solids
Water elevations	Iron
Colors and sheens	Sodium
(by observation)	Arsenic
	Cadmium
	Chromium
	Lead
	Mercury
	Total ammonia – N
	Xylenes
	Those parameters listed in
	EPA Methods 601 and 602

Response to (4)(b)4.: The included Technical Report indicates results of sampling of the above requirements.

5. Background water quality shall be established in accordance with the provisions of paragraph 62-701.510(5)(b), F.A.C., except that the analysis shall also include sulfate and aluminum. In addition, all background and detection wells shall be sampled and analyzed at least once every five years for those parameters listed in paragraph 62-701.510(7)(a), F.A.C., as well as sulfate and aluminum.

Response to (4)(b)5.: Please refer to the included Technical Report.

6. The owner or operator of the facility may request a permit modification from the appropriate District Office of the Department to delete specific laboratory parameters or field parameters from routine analyses of detection wells and surface water. The Department will grant a request for a permit modification upon a demonstration that these parameters are not reasonably expected to be in or derived from the waste which was received or disposed of at the facility.

Response to (4)(b)6.: Noted.

(c) If monitoring parameters are detected in monitoring wells in concentrations which are significantly above background water quality, or which are at levels above the Department's water quality standards or criteria specified in Chapter 62-520, F.A.C., the provisions of subsection 62-701.510(6), F.A.C., shall apply.

Response to (4)(c).: Noted. Latest sampling indicates that there are NO levels which require implementation of this section.

(d) No solid waste other than construction and demolition debris shall be disposed of at a construction and demolition debris disposal facility.

Response to (4)(d).: Noted. The Engineer's Report lists additional waste which this facility has voluntarily decided not to accept. Please refer to the list of Prohibitions and materials Allowed in Section 4 of the Engineer's Report.

(e) Waste material from a waste processing facility which is mixed with Class I or Class III waste, either before or after processing, is not considered construction and demolition debris and may not be accepted for disposal at a construction and demolition debris disposal facility.

Response to (4)(e).: The type of waste describe above is not accepted for disposal at Friends Recycling, LLC. Please refer to the list of Prohibitions on Section 4 of the Engineer's Report.

(f) If a facility is constructed with a liner system, it shall consist of at least a single 60-mil minimum average thickness HDPE geomembrane. In the sumps located inside the disposal facility footprint and in the leachate collection trenches, the geomembrane shall be placed on a GCL with a saturated hydraulic conductivity of less than or equal to 1×10^{-7} cm/sec, or on a compacted clay liner which is a minimum six inches thick with a saturated hydraulic conductivity of less than or equal to 1×10^{-7} cm/sec. The liner shall be placed on a prepared subgrade that will not damage the geomembrane liner or the GCL. A primary leachate collection and removal system and a

drainage layer shall be installed above the geomembrane liner. Except in sumps and leachate collection trenches, the system shall be designed to limit leachate head above the liner during routine facility operation after placement of initial cover to no greater than 12 inches. The liner system must be constructed in accordance with the requirements of paragraphs 62-701.400(3)(a), (d), (e), and (f), and subsections 62-701.400(4), (7), and (8), F.A.C. Any alternative liner system shall be approved only in accordance with the provisions of Rule 62-701.310, F.A.C.

Response to (4)(f): Not Applicable because there are no liners in this facility.

(g) No solid waste disposal unit shall be located in the 100-year floodplain where it will restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain unless compensating storage is provided, or result in a **washout of solid waste**.

Response to (4)(g): The cells for this facility are not located in a 100-year flood plain. This issue was reviewed and approved by FDEP during the previous renewal process. Please refer to the FDEP approved permit No. SO42-0019600-007, dated July 30, 2008.

(h) For an above-grade disposal facility, the minimum horizontal separation between the waste disposal area and the site property boundary shall be 100 feet, measured from the toe of the proposed final cover slope.

Response to (4)(h): This facility has "Historical Waste" with setback less than 100 feet, in volume amounts which classify it as "Significant Waste", making its relocation or removal impractical. Setbacks less than 100 feet were reviewed and approved during the previous permit renewal process (permit No. SO42-0019600-007, July 30, 2008). From that date on, waste has been placed within approved setbacks.

(i) The horizontal boundaries of the waste disposal area authorized in the construction or operation permit shall be clearly delineated with permanent or semi-permanent markers, such as bollards, posts, fencing, or signs, so that the operators can determine on a daily basis whether or not the facility is exceeding its permitted dimensions.

Response to (4)(i): Cell and sub-cell markers have been installed prior to this application for renewal, as shown in the enclosed drawings (topographic survey). These markers consist of a 4" x 4" post painted red protruding at least 48" above ground. These markers have been placed at certain locations and where practical to help identify the limits of permitted work space.

(5) Stormwater. For aboveground disposal units, the design of any features intended to convey stormwater to a permitted or exempted treatment system shall be included in the solid waste construction permit.

Response to (5): This application for renewal, without lateral expansion or construction, does not seek to modify the previously approved storm water conveyance and storage. Please refer to approved permit No. SO42-0019600-007, July 30, 2008.

(6) Temporary storage. The owner or operator shall make arrangements or shall have equipment for temporary storage, handling and transport to an authorized disposal or recycling facility for solid waste, other than construction and demolition debris, that is inadvertently accepted by the facility. Such solid waste that is accepted by the facility shall be segregated and disposed of in accordance with Department rules. Unless an alternate schedule is included in an operation plan submitted with the permit application, which provides for the control of odors and vectors, putrescible waste shall not be stored for longer than 48 hours and non-putrescible waste shall not be stored for longer than 30 days. Any hazardous waste that is received by the facility shall be managed in accordance with the provisions of Chapter 62-730, F.A.C.

Response to (6): Friends Recycling, LLC, has the necessary equipment and operators to handle solid waste other than C & D debris. Said waste is placed in dumpsters which are emptied within 48 hours.

(7) Operation requirements. Owners and operators of construction and demolition debris disposal facilities shall comply with the following requirements:

(a) An operation plan describing the facility operations and maintenance, emergency and contingency plans, and types of equipment that will be used shall be kept at the facility at all times and made available for inspection. The operation plan shall describe the method and sequence of filling waste and shall state the maximum allowed lift depth. Lift depth shall not exceed 10 feet unless authorized in the operation plan. Lift depths greater than 10 feet may be allowed depending on specific operations, daily volume of waste, width of working face, and good safety practices. All activities at the facility shall be performed in accordance with this plan and the permit conditions. The plan shall be updated as operations change but no less frequently than every five years. The operation permit shall be modified to reflect any substantive changes to the plan, other than those required for routine maintenance.

Response to (7)(a): The required Operation Plan has been included as a section in the Engineer's Report.

(b) Construction and demolition debris shall be compacted and sloped during the life of the facility to assure that the requirements of subsection (9) of this section can be met. A schedule for compaction and grading shall be included in the operation plan. The external slopes of all disposal units shall be no greater than three feet horizontal to one foot vertical rise. The working face and internal slopes of all disposal units shall not be greater than three feet horizontal to one foot vertical rise unless reasonable assurance is provided in the operation plan that fires can be controlled in steeply sloped areas.

Response to (7)(b): The Operation Plan and other included drawings depict external slopes as 3:1 (H:V) and the Operation Plan calls for working face slopes not to exceed 3:1 (H:V).

(c) Access to the disposal facility shall be controlled during the design period of the facility by fencing or other effective barriers to prevent disposal of solid waste other than construction and demolition debris. Signs indicating the name of the operating authority, traffic flow, hours of operations and restrictions or conditions of disposal shall be posted.

Response to (7)(c): The Friends Recycling, LLC has controlled access by means of chainlink fence and gates. Required information signs are located at the gated entrance.

(d) A trained operator shall be on duty at the facility at all times that the facility is operating. In addition, a sufficient number of spotters shall be on duty at the working face to inspect the incoming waste at all times waste is being accepted at the site. Waste shall be inspected after it is removed from the transport vehicle and prior to placement for final disposal. Any unauthorized waste shall be removed from the waste stream and placed into appropriate containers or secure storage areas for disposal or recycling at a facility authorized by the Department to receive such waste.

Response to (7)(d): Trained operators are on duty when the facility is operating. Friends Recycling, LLC has recycle bins for waste segregated prior to final disposal, and dumpsters for prohibited waste which is inadvertently received.

(e) The facility shall be operated to control objectionable odors in accordance with subsection 62-296.320(2), F.A.C. If objectionable odors are detected off-site, the owner or operator shall comply with the requirements of paragraph 62-701.530(3)(b), F.A.C.

Response to (7)(e): An updated Odor Management Plan has been included as a section in the Engineer's Report.

(f) Fuels, solvents, lubricants, and other maintenance materials shall be stored in secure areas separate from the disposal or sorting areas.

Response to (7)(f): Friends Recycling, LLC has a dedicated area where equipment fluids and fuel are stored away from the disposal and sorting areas.

(g) Plastic buckets may be accepted at the facility unless they contain liquids other than water when they arrive; however, they may contain hardened paint, tar, cement or similar non-hazardous materials.

Response to (7)(g): Noted. The Operation Plan lists these items and restriction in the Allowed Materials section.

(h) Carpet remnants that are from a construction or demolition project or from a carpet manufacturer may be accepted at the facility.

Response to (7)(h): Noted. The Operation Plan lists these items and restriction in the Allowed Materials section.

(i) CCA treated wood shall be managed as provided in subsection (20) of this section.

Response to (7)(i): Noted. The Operation Plan includes a section for the management of CCA treated woods.

(j) If any regulated hazardous wastes are discovered to be improperly deposited at the facility, the facility operator shall promptly notify the Department, the person responsible for shipping the wastes to the facility, and the generator of the wastes, if known. The area where the wastes are deposited shall immediately be cordoned off from public access. If the generator or hauler cannot be identified, the facility operator shall assure the cleanup, transportation, and disposal of the waste at a permitted hazardous waste management facility.

Response to (7)(j): Noted. The Operation Plan lists these requirements.

(8) Training. Operators and spotters employed at the facility shall be properly trained in accordance with subsection 62-701.320(15), F.A.C.

Response to (8): Noted. Certificates for completion of training have been included in this application for renewal..

(9) Closure.

(a) At least 90 days prior to the date when wastes will no longer be accepted, the owner or operator of the construction and demolition debris disposal facility shall submit an updated closure plan to the Department to reflect any changes in the closure plan due to actual operational conditions at the facility. If unforeseen circumstances do not allow the notification within 90 days prior to ceasing to receive wastes, then notice shall be provided as soon as the need to close the facility becomes apparent. The updated and approved closure plan shall be incorporated into and made part of the permit.

Response to (9)(a): Noted. Please refer to the enclosed Closure Plan.

(b) Final cover and seeding or planting of vegetative cover shall be placed on each disposal unit within 180 days after it has reached its final grade or ceased receiving wastes. Final cover shall consist of a 24-inch-thick soil layer, or a 30-inch thick layer consisting of approximately 50 percent soil and 50 percent ground or chipped yard trash by volume, the upper six inches of which shall be capable of supporting vegetation, and shall be graded and compacted as necessary to eliminate ponding, promote drainage, and minimize erosion. The side slopes of all above-grade disposal units shall be no greater than three feet horizontal to one foot vertical rise. If the disposal unit is lined, the closure design shall include a barrier layer or other measures to ensure that the design leachate head over the liner is not exceeded after closure. The final cover shall be vegetated to control erosion. Disposal units that are aboveground shall be designed to control the flow of stormwater, such as building reverse sloping benches or terraces into the side slopes of the disposal units and shall contain down slope drainage ways with water flow energy dissipaters unless reasonable assurance is provided that adequate erosion control will be achieved in the absence of such measures.

Response to (9)(b): Noted. Please refer to the enclosed Closure Plan.

(c) Placement of final cover may be delayed if additional waste will be deposited on the disposal unit within five years, but only if the disposal unit is temporarily closed in accordance with an approved closure plan. Conditions of temporary closure shall include:

1. The disposal unit was constructed in compliance with its permit conditions;
2. A schedule for temporary and final closure is shown in the closure plan;
3. Final cover is installed on side slopes of each completed disposal unit which will not receive additional waste;

4. Odors and runoff are controlled;
5. The closure cost estimate takes into account the costs of temporary closure as well as the costs of the final closure; and
6. An intermediate cover is installed on the disposal unit within 30 days after the unit stops accepting waste. The intermediate cover may be removed before placing additional waste or installing final cover.

Response to (9)(c): Noted. Please refer to the enclosed Closure Plan.

(d) The owner or operator shall provide a certification of closure construction completion to the Department within 30 days after closing, covering, and seeding the disposal unit. The owner or operator shall also provide a final survey report done by a professional surveyor, in accordance with paragraph 62-701.600(6)(b), F.A.C., if disposal operations have raised the final elevations higher than 20 feet above the natural land surface.

Response to (9)(d): Noted. Please refer to the enclosed Closure Plan.

(e) Upon receipt and approval of the documents required in paragraph (d) of this subsection, the Department shall, within 30 days, acknowledge by letter that notice of termination of operations and closing of the facility has been received. The date of this letter shall be the official date of closing for the purpose of determining the long-term care period, in accordance with subsection 62-701.600(8), F.A.C.

Response to (9)(e): Noted. Please refer to the enclosed Closure Plan.

(f) Declaration to the public. After closing operations are approved by the Department, the facility owner or operator shall file a declaration to the public in the deed records in the office of the county clerk of the county in which the facility is located. The declaration shall include a legal description of the property on which the facility is located and a site plan specifying the area actually filled with construction and demolition debris. The declaration shall also include a notice that any future owner or user of the site should consult with the Department prior to planning or initiating any activity involving the disturbance of the facility's cover, monitoring system or other control structures. A certified copy of the declaration shall be filed with the Department.

Response to (9)(f): Noted. Please refer to the enclosed Closure Plan.

(10) Long-term care. The owner or operator of the construction and demolition debris disposal facility shall continue to monitor and maintain the integrity and effectiveness of the final cover as well as other appurtenances of the facility, control erosion, fill subsidences, comply with the ground water monitoring plan, and maintain the stormwater system pursuant to a Department permit for five years from the date of closing. Before the expiration of the long-term care monitoring and maintenance period, the Department may extend the time period if the ground water monitoring system indicates that the facility continues to impact ground water at concentrations which may be expected to result in violations of Department water quality standards or criteria; if site-specific conditions make it likely that any contamination which may emanate from the disposal area would not be detected within five years; if the final cover does not have well established vegetation or is showing signs of continuing significant erosion problems; or if the permittee has not performed all required monitoring or maintenance.

Response to (10): Noted.

(11) Financial assurance.

(a) As a condition for issuance of an off-site construction and demolition debris disposal facility permit, or permit modification authorizing expansion, the owner or operator shall provide the Department with closure cost estimates for the permitted portions of the facility as part of the application. Proof of financial assurance issued in favor of the Florida Department of Environmental Protection in the amount of the closing and long-term care cost estimates for each permitted disposal unit shall be provided at least 60 days prior to the initial receipt of waste at such unit. No solid waste shall be stored or disposed of at a solid waste disposal unit until the permittee has received written approval of the financial assurance mechanism from the Department. The financial mechanism shall either be:

1. For facilities owned or operated by a local government, an escrow account pursuant to subsection 62-701.630(5), F.A.C. or an alternate financial mechanism pursuant to subsection 62-701.630(6), F.A.C.; or

2. For facilities not owned or operated by a local government, an alternate financial mechanism pursuant to subsection 62-701.630(6), F.A.C.

Response to (11)(a): Friends Recycling, LLC is a privately owned facility; as such (11)(a)2. applies. For the purpose of this permit renewal, the same instrument previously on file will be used, except that the amounts will be updated to reflect the new cost estimate prepared for this permit renewal cycle.

(b) Closure cost estimates and annual updates thereof shall comply with the provisions of subsection 62-701.630(3) and paragraphs 62-701.630(4)(a) through (d), F.A.C., except that the cost of long-term care shall be based upon a five-year period, and the costs shall be based upon compliance with this section.

Response to (11)(b): Noted. Please refer to the enclosed Closure Plan and costs estimates.

(c) If a local government requires financial assurance for closure, which is at least as stringent as that required by this rule, the Department will attempt to establish a cooperative mechanism with the local government and thereby avoid duplicative financial requirements.

Response to (11)(c): Noted.

(d) Owners or operators of facilities that are required to undertake a corrective action program in accordance with paragraph 62-701.730(4)(c), F.A.C., shall submit proof of financial assurance to the Department in accordance with subsection 62-701.630(7), F.A.C., no later than 120 days after the corrective action remedy has been selected.

Response to (11)(d): Noted.

(e) If long-term care is extended because the permittee has failed to perform all required monitoring and maintenance, during the long-term care period, financial assurance shall continue to be required during the extended long-term care. If the long-term care is extended for any other reason, financial assurance is not required during the extended long-term care period, except as may be required in paragraph (d) of this subsection.

Response to (11)(e): Noted.

(12) Annual Reports. The owner or operator of the facility shall submit an annual report to the Department on Form 62-701.900(7). This report shall include a summary of the amounts and types of wastes disposed of or recycled. The county of origin of materials that are recycled, or a statement that the county of origin is unknown, shall be included in the report. The report shall be submitted no later than February 1 of each year and shall cover the preceding calendar year.

Response to (12): Noted.

(13) Recycling.

(a) The owner or operator of a facility that accepts construction and demolition debris for disposal and that also recovers materials from the construction and demolition debris waste stream for purposes of recycling shall meet the requirements of this section as well as the requirements of Rule 62-701.710, F.A.C. If there is a conflict between this section and Rule 62-701.710, F.A.C., this section shall govern. It is not necessary for the owner or operator to apply for a separate permit as a waste processing facility or to pay an additional fee.

Response to (13)(a): Noted. This applies to Friends Recycling, LLC operations.

(b) The owner or operator of a facility that recovers materials from the construction and demolition debris waste stream for purposes of recycling but that does not dispose of any wastes on-site shall apply for a permit on Form 62-701.900(4), and shall comply with the provisions of Rule 62-701.710, F.A.C.

Response to (13)(b): Noted. This is NOT applicable to Friends Recycling, LLC operations.

(c) In order to reuse recovered screened material other than clean debris from the construction and demolition debris waste stream, an owner or operator shall demonstrate that this material will be managed and reused in a

manner that will pose no significant threat to public health or the environment. In making this demonstration, the owner or operator may consider background levels of receiving soils, whether the material will be blended with other materials, and the likelihood that the material may have unlimited distribution or come into direct contact with the public. Examples of management practices which would not require analysis for health-based criteria include permanent encapsulation, use as initial or intermediate cover or subsurface construction at a permitted landfill, or use under at least two feet of clean cover material.

Response to (13)(c): Noted.

(d) Metal, paper, glass, plastic, textile, or rubber materials that have been diverted and source separated or have been removed from the construction and demolition debris waste stream for sale, use, or reuse as raw materials may be managed as recovered materials. Other materials that have been diverted and source separated or have been removed from the construction and demolition debris waste stream may be sold, used, or reused as raw materials upon a demonstration that the material will pose no significant threat to public health or the environment.

Response to (13)(c): Noted.

(14) Incineration. A facility that employs an air curtain incinerator and that also stores or disposes of construction and demolition debris at the site shall meet the permitting requirements of Rule 62-256.500, F.A.C., as well as this section.

Response to (14): Not applicable to this facility.

(15) Clean debris. Clean debris may be used as fill or raw material in any area, including waters of the State, subject to receipt of an environmental resource permit from the Department where applicable. Clean debris used as fill material is not solid waste, and such use does not require a solid waste permit under this rule.

Response to (15): Noted.

(16) Landfill disposal. Construction and demolition debris may be disposed of in a permitted landfill. However, each county must maintain segregated disposal areas for construction and demolition debris. The cover requirements for a segregated construction and demolition debris disposal area within a permitted landfill shall be those in subsection (9) of this section. Landfills permitted in accordance with Rule 62-701.330, F.A.C., which have construction and demolition debris disposal units or recycling facilities included as part of their permit conditions, are not required to submit separate permit applications or financial assurance documents under this section.

Response to (16): Noted.

(17) On-site disposal. Construction and demolition debris that is disposed of on the property where it is generated, or on property that is adjacent or contiguous to and under common ownership and control as that property where the waste is generated, is exempt from the requirements of this section and Rule 62-701.330, F.A.C. However, such disposal is subject to the prohibitions of Rule 62-701.300, F.A.C. All waste shall be inspected by the generator or a spotter prior to disposal, either at the point of generation or at the disposal site, to ensure that any unauthorized waste is removed from the waste stream prior to disposal and managed in accordance with Department rules. Final cover and seeding or planting of vegetative cover shall be placed on each disposal unit within 180 days after final receipt of waste. Final cover shall consist of a 24-inch-thick soil layer, the upper six inches of which shall be capable of supporting vegetation, and shall be graded and compacted as necessary to eliminate ponding, promote drainage, and minimize erosion. The side slopes of all above-grade disposal areas shall be no greater than three feet horizontal to one foot vertical rise.

Response to (17): Not applicable to this facility.

(18) Disposal restrictions. Construction and demolition debris may be disposed of only in accordance with one of the methods authorized above. In addition, disposal areas shall be operated so that adverse environmental and public health impacts, such as blowing litter and vectors, are minimized. Upon discovery that a permitted facility has disposed of solid waste outside of its permitted dimensions, the owner or operator shall notify the Department within three working days of this discovery. If all waste is not relocated within the permitted dimensions of the facility within 30 days of discovery, upon order of the Department the facility shall not accept any waste until the facility is in compliance with its permitted dimensions.

Response to (18): Noted.

(19) Asbestos waste disposal. Asbestos-containing waste materials regulated pursuant to 40 C.F.R. Part 61, Subpart M, shall not be disposed of in a construction and demolition debris disposal unit.

Response to (19): Noted. This is listed under the Prohibitions list of Section 4 of the Engineer's Report.

(20) CCA treated wood. The owner or operator of a facility, except for a disposal facility with a constructed liner system, shall design and implement a CCA treated wood management plan. The plan shall be designed to minimize the amount of CCA treated wood that is delivered to the facility, and must describe procedures the operator will use to make a reasonable effort to separate any CCA treated wood from other wastes at the facility. CCA treated wood that is separated from other wastes at the facility shall not be disposed of at an unlined solid waste disposal facility.

Response to (20): Noted. CCA treated wood is listed under the Prohibitions list of Section 4 of the Engineer's Report. Additionally, the Operation Plan section of the Engineer's Report, contains a section for management of CCA treated wood which may have been received at the facility.

(21) Alternate procedures. The owner or operator of a facility may request alternate procedures and requirements in accordance with Rule 62-701.310, F.A.C. However, if such request is based upon the nature of the construction and demolition debris accepted at the facility (for example, if a facility accepts only segregated wastes which are expected to have a minimal environmental impact), the request will be submitted to and acted on by the appropriate District office of the Department, and need not be accompanied by any additional fee.

Response to (21): Noted.

ATTACHMENT 2



PERMIT RENEWAL APPLICATION FORM

ATTACHMENT 3

COPY OF CHECK FOR APPLICATION FEE

COPY OF CHECK FOR APPLICATION FEE

Check made out to Florida Department of Environmental Protection in the amount of \$2,000.00 to cover the application fee for a renewal term of ten (10) years.

FRIENDS RECYCLING LLC 2350 NW 27TH AVE. PH. 352-622-6800 OCALA, FL 34475		4434
DATE <u>1-29-13</u>		63-1482/670 982
PAY TO THE ORDER OF	<u>Florida Department of Environmental Protection</u>	\$ <u>2,000.00</u>
<u>Two thousand</u>	<u>00/100</u>	DOLLARS
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MEMO

Friends Odor Control permit modification

Tan D. Guerra

MP

⑈005594⑈ ⑆083102152⑆0072000138527⑈

ATTACHMENT 4

**COST ESTIMATE FOR CLOSURE
AND
LONG-TERM CARE**

ATTACHMENT 5
CERTIFICATES OF TRAINING

ATTACHMENT 6
PROOF OF OWNERSHIP

ATTACHMENT 7
REPORTING FORMS

ATTACHMENT 8
DRAWINGS

ATTACHMENT 9

**GUIDANCE FOR THE MANAGEMENT AND DISPOSAL
OF
CCA-TREATED WOOD**