



Florida Department of Environmental Protection

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By E-Mail
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Mr. Gerald Laurengo
Friends Recycling, LLC
2350 N. W. 27th Avenue
Ocala, FL 34475

OCD-SW-08-0628

Marion County – SW
Friends Recycling, LLC – C&D Disposal & Recycling
Permit No. SO42-0019600-007; WACS ID #21012
Response to letter "Friends Recycling," dated November 13, 2008

Dear Mr. Laurengo:

Guerra Development Corporation submitted the letter "Friends Recycling," dated November 13, 2008. It was received November 18, 2008. Guerra's letter requests a suspension of Permit Specific Condition #16. It provided an update to efforts to eliminate the use of private wells west of the facility.

1. Permit Specific Condition #16 states, "Sub-cells 1B and 2C: Existing C&D debris shall be removed from sub-cells 1B and 2C and disposed into sub-cell 1A within a 90-day time period starting upon issuance of this permit – Sheet No. 2 of 6 (Reference No. 13 – Appendix A)." Previously an extension to the 90 days had been granted. In the letter is a request to suspend the requirement to remove the waste until ground water sampling results indicate a trend in the water quality in MW #7.
 - a. MW#7 is a newly installed well. The letter states the one sampling result for MW#7 shows no significant concerns. The result had a few minor exceedances, but your consultant did not think the exceedances are related to the waste in question.
 - b. The report for the August 28, 2008 sampling event indicates exceedances of the following constituents in MW#7: aluminum, iron, TDS, phenols, and nitrate. Phenols and nitrates are contaminants that may result from a C&D disposal facility. We do agree the one sample result is not enough sufficient to determine if the C&D waste is a source of contamination.
 - c. The Department is willing to modify Permit Condition #16 to state:
Sub-cells 1B and 2C: Existing C&D debris shall be removed from sub-cells 1B and 2C and disposed into sub-cell 1A within a 90-day time period after notification from the Department – Sheet No. 2 of 6 (Reference No. 13 – Appendix A). The Department's decision regarding the need for removal of the waste will depend upon the ground water quality results for MW#7.
2. Permit Specific Condition #17 states, "Sub-cell 2B: Existing C&D waste within sub-cell 2B shall be removed within 9 months from the date this permit is issued, if the potable water wells are not replaced by the city water supply. If it appears that the C&D waste removal will take longer than 9 months, the permittee must provide the Department advance written notice of the cause and delay, and request an extension for completion of the project – Sheet 2 of 6

(Reference No. 13 – Appendix A). Guerra's letter states the water mains are already in place. In a recent conversation, you indicated that you are working with the City to complete the plans for the connections. You did not indicate how long it may take to complete the project, including the proper abandonment of the current potable wells.

- a. Please provide an estimated timeline for completing the switching of residences from well to city water.
- b. The Department is willing to modify Permit Condition #17 to state:
Sub-cell 2B: Existing C&D waste within sub-cell 2B shall be removed within 9 months after notification from Department or by July 30, 2010, if the potable water wells are not replaced by the city water supply. If it appears that the C&D waste removal will not be completed on time, the permittee must provide the Department advance written notice of the cause and delay, and request an extension for completion of the project – Sheet 2 of 6 (Reference No. 13 – Appendix A).

Please submit the timeline mentioned in Item 2.a. within 30 days. Include any comments about the proposed modifications to Specific Conditions 16 and 17.

If you have any questions, please contact me at tom.lubozynski@dep.state.fl.us or by phone at 407-893-3328.

Sincerely,



F. Thomas Lubozynski, P.E.
Waste Program Administrator

Date: December 29, 2008

FTL/ftl/ew

cc: Juan C. Guerra, P.E., Guerra Development Corp. guerracorp@att.net