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OKEECHOBEE LANDFILL, INC.

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March 8, 2010

Mr. Amede Dimonnay
Florida Department of Environmental Protection
400 N. Congress Avenue
West Palm Beach, Florida 33401

Subject: Clay Farms Landfill Construction/Operation Permit Renewal
Okeechobee, Florida

Dear Mr. Dimonnay:

The Okeechobee Landfill Facility located in Okeechobee County, Florida, includes two permitted waste disposal footprints, as described below:

- A 207-acre Class I waste disposal footprint known as the Berman Road Landfill, which is the currently active landfill; and
- A 639-acre Class I waste disposal footprint known as the Clay Farms Landfill, which is not developed yet.

The Clay Farms Landfill construction/operation permit expires December 1, 2010; and the permit renewal application should be submitted to the Florida Department of Environmental Protection (FDEP) no later than October 1, 2010. The newly promulgated version of the solid waste rules (Chapter 62-701 of the Florida Administrative Code) requires the base of the landfill and the leachate collection system (LCS) pipes to be designed with the post-settlement minimum slopes of 1.0 percent and 0.3 percent, respectively. The Clay Farms Landfill currently permitted base and LCS pipe slopes do not meet these minimum requirements. In our understanding, the renewal application must include design modifications to meet the new rule requirements, including the base and LCS pipe slopes.

In consideration of the available airspace at the Berman Road Landfill and the proposed expansions to the Berman Road Landfill, Okeechobee Landfill, Inc. (OLI), the owner and operator of Okeechobee Landfill, envisions that development of the Clay Farms Landfill will commence circa 2025, with the first phase to be in service in 2027. OLI will continue keeping the Clay Farms Landfill permit active by submitting permit renewal applications whenever required. However, since construction of the first phase of the Clay Farms Landfill is not anticipated to commence for another 15 years, and during the next 15 years the State of Florida solid waste rules will most likely change again, OLI is requesting a temporary waiver of any design changes to the Clay Farms Landfill until two years prior to the development of the first phase, in approximately 2023. The requested waiver will save tremendous effort that must be spent to redesign the Clay Farms Landfill for the upcoming permit renewal, only to be redesigned in another 7 to 10 years. The original application for the permitting of the Clay

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Mr. Amede Dimonnay
March 3, 2010
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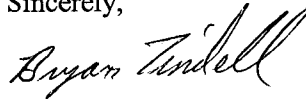
Farms Landfill included 13 binders of supporting documents. OLI anticipates that each redesign would require the same level of effort to prepare the application and same volume of documents to be reviewed by FDEP. The requested temporary waiver can potentially save a significant amount of effort for all involved parties for at least one round of permitting.

OLI is proposing to submit a typical renewal application that is normally submitted for landfills without any changes, prior to October 1, 2010, referencing documents that are currently available on file with the FDEP, and confirming that the base of the landfill ought to be modified to meet the new rules, however this modification will be delayed until such time as discussed above.

OLI realizes that this request must be reviewed by the FDEP District Office and possibly the solid waste officials of the FDEP Tallahassee office. OLI is available to meet with you and your colleagues in the West Palm Beach office and/or the Tallahassee office to discuss your questions and concerns. We greatly appreciate your consideration of this matter, and we look forward to hearing back from you in near future. We respectfully request a prompt response since time is of the essence for the preparation of the renewal application.

Please contact me at (984) 954-2000 if you have any questions

Sincerely,



Bryan Tindell
Director of Disposal Operations

Copy:
Tony Bishop, OLI
Charles Orcutt, OLI
Bryan Tindell, WMIF
Ali Khatami, Globex