



# Florida Department of Environmental Protection

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By E-Mail  
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Mr. Gerald Laurencio  
Friends Recycling, LLC  
2350 N. W. 27<sup>th</sup> Avenue  
Ocala, FL 34475

OCD-SW-07-0506

Marion County – SW  
Friends Recycling, LLC – C&D Disposal & Recycling  
Permit Application No. SO42-0019600-007  
Review of Cell 2 Certification of Construction Completion

Dear Mr. Laurencio:


Guerra Development Corporation submitted the form "Certification of Construction Completion of a Solid Waste Management Facility" regarding Cell 2 on your behalf. The form was dated October 19, 2007. It was received on October 25, 2007 as an attachment to a letter "Friends Recycling – RAI dated 08-13-07," dated October 23, 2007. On November 15, 2007 the Department conducted a site visit regarding this submittal and the permit renewal application.

As I discussed after the site visit, the "Certification of Construction Completion" for Cell 2 is not acceptable. Cell 2 is not ready to receive waste at this time for the following reasons:

1. The permit drawings dated 2-12-2002 are the basis for the approved initial elevations when Cell 2 is ready for waste. The topographic survey (dated 9-07-2007 but signed and sealed 10-04-2007) included with the Certification does not match the topography shown in the 2-12-2002 drawing. (Mr. Guerra stated that the topography in Cell 2 as depicted on the 10-04-2007 survey was a generalized depiction not a true representation of the topography.)
2. Most of the area in Cell 2 has not been cleared of vegetation, so it is not ready to receive waste.
3. Before waste can be accepted into a disposal area, monitoring wells (upgradient and downgradient) must be in place and previously sampled. The present ground water monitoring plan is not sufficient if waste is allowed to be placed in Cell 2.
4. The submittal does not identify the required setbacks from nearby potable wells. No exemption (waiver) has been granted for the setback requirement.

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

Sincerely,

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

Date: November 21, 2007

cc: Juan C. Guerra, P.E., Guerra Development Corp. [guerracorp@att.net](mailto:guerracorp@att.net)