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Guerra Development Corporation

Civil & Structural Engineering

AM

March 26, 2013

12-03 02.ltr

RECEIVED

Mr. F. Thomas Lubozynski, P.E.

Waste Program Administrator, Central District, DEP

3319 Maguire Boulevard, Suite 232

Orlando, Florida 32803-3767

MAR 2 9 2013

DDB Guntral District

JN 12-03

SUBJECT:

Friends Recycling, LLC

Marion County - SW WACS #21012

Friends Recycling - C&D Disposal and Recycling

Response to First Request for Additional Information

Permit Application No. 0019600-008-SO-24

Dear Mr. Lubozynski,

Enclosed please find our response to your First Request for Additional Information, dated March 1, 2013. A detailed response to each comment has been attached hereto, along with additional documents and revised report pages and/or drawings.

If you have any questions please feel free to contact me at (352) 629-8060 or via email at jcg@guerracorp.net.

Sincerely,

Juan C. Guerra, P.E.

President

Guerra Development Corporation

(352) 629-8060 Ph

enclosures:

- Response to first RFI dated March 1, 2013

- Copy letter from City of Ocala, by Sean Lanier, PE, CFM, 3/26/13, acknowledges donation of Right of Way by Friends to construct city road and water main.

- Copy letter from City of Ocala, by Jeff Halcomb, 3/26/13 with attached letter from DEP regarding water main installed along west boundary of Friends Recycling.

- Copy of Map Depicting homes connected to city water

Revised report pages

Revised drawings
 Explanation of cost estimate quantities

- Third party prices for top soil cover and vegetative layer

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

Ocala, Marion County, Florida



GUERRA DEVELOPMENT CORPORATION

CIVIL AND STRUCTURAL ENGINEERING 2817 N.E. 3rd Street Ocala, Florida 34470 Ph: (352) 629-8060 email: guerracorp@att.net





March 26, 2013

12-03 02.ltr

Mr. F. Thomas Lubozynski, P.E. Waste Program Administrator, Central District, DEP 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767

SUBJECT:

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Marion County - SW WACS #21012

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RESPONSE TO RFI FROM FDEP DATED MARCH 1, 2013 FRIENDS RECYCLING C & D DISPOSAL AND RECYCLING

Marion County - SW WACS #21012 Permit Application No. 0019600-008-SO-24

1. In the Comprehensive Engineer's Report, page 2, section 1.4.3 states "The owners of the facility would like to continue operations and as required by permit conditions, are applying for a 10 year permit renewal." The facility does qualify for a 10 year operations permit. A fee of \$2,000 was paid at the time of submittal of this application; therefore, the 10 year permit is paid in full.

Response: Noted

- 2. In the Comprehensive Engineer's Report, page 6, section 2.4.4.3 states "Friends Recycling, LLC shall apply for a construction permit to prepare Cells #1B, #2B and #2C to receive waste."
 - a. Please note that Sub-cells #1B, #2B and #2C may only receive clean debris. This is restriction is because of potable well setback requirements. The restriction is properly described in the table on page 6 and on Drawing Sheet 5 of 7.

Response: Noted

- b. When the Department approved Cells 1 and 2 not much information was required for construction details of an unlined C&D disposal facility. Now, more detail is necessary to ensure the waste area is properly prepared before authorization to receive waste is given. The following sub-cells have not yet been approved for disposal of C&D waste: #1B, #2B, #2C and the remainder of sub-cell 2A. The design (that is, bottom elevations) of those areas does need to be documented. Response: Noted. At this time, Friends Recycling LLC does not know if they intend to place debris over the existing ground at these sub-cells or if they would excavate to an elevation around 64.00. This would be made clear during the application for construction to prepare the sub-cells prior to receiving debris.
 - I. Drawing Sheet 5 of 7 has a note that states, ""Prior to receiving waste, cell 2 (or portions thereof) shall be graded so that the lowest bottom elevation is 64.00."
 - (1) A bottom elevation not lower than 64-feet is approved for #2B and the remainder of sub-cell 2A.

Response: Noted

(2) Will the bottom of Sub-cell 2C be excavated to 64-feet? Or, will the clean debris be deposited on the existing topography as depicted in the drawing "Topographic Survey," from Rogers Engineering, Inc., dated 12-21-2012? If you intend that the bottom of sub-cell 2C be lower than the elevations shown on the topographic survey, then provide a drawing that shows the design of sub-cell 2C.

Response: Noted. At this time, Friends Recycling LLC is not seeking to place debris at sub-cell 2C. At a later date when economically feasible, an application for construction will be submitted to the department and plans will be included to depict the proposed geometry of the cell and its bottom elevation.

ii. Where is the bottom elevation of Sub-cell 1B described? Will the clean debris be deposited on the existing topography as depicted in the drawing "Topographic Survey," from Rogers Engineering, Inc., dated 12-21-2012? If you intend that the bottom of sub-cell 1B be lower than the elevations shown on the topographic survey, then provide a drawing that shows the design of sub-cell 1B.

Response: Bottom elevation is not described, but it is understood that it can not be lower than 64.00. Debris on sub-cell 1B was placed by previous owners of the C&D landfill (historical waste). Friends Recycling LLC intends to place debris on sub-cell starting from current topography, with the understanding of the limitations as to the type of clean debris that can be deposited there.

3. In the Report, Operation Plan section 4.2.3.4, please add how CCA treated wood will be identified when spotting loads of waste. Attached is "Guidance for the Management and Disposal of CCA-Treated Wood." It could be referenced in the Operations Plan. The Operator can use this document to explain to workers methods to help identify and handle suspect material.

Response: We thank the department for the reference. The enclosed guidance manual is being incorporated by reference in the Operations Plan. This was discussed with the operating manager and operator of the facility, and it was agreed that this guidance manual will be made required reading by facility personnel, and it shall be kept (along with the Operations Plan) at the office and available to all personnel.

- 4. In the Report, Operation Plan section 4.2.1.2 does prohibit hazardous waste from being disposed at the facility. However, that section does not describe the actions that must be taken if hazardous waste is received. Add a section to the Operation Plan to specifically address regulated hazardous wastes. The section should clearly meet the requirement of Rule 62-701.730(7)(j), F.A.C. and should address the following actions upon discovery of a regulated hazardous waste:
 - a. Notify the Department,
 - b. Notify the person responsible for shipping the wastes (when possible),
 - c. Notify the generator of the wastes (when possible),
 - d. Cordon off the area where the wastes are deposited,
 - e. State that the facility will assure the cleanup, transportation and disposal of the waste at a permitted hazardous waste management facility.

Response: The Operations Plan has been revised to include a section as to what to do once hazardous waste is identified. Although the revised section closely follows your requirements (above), language has been included to avoid tripping all reporting and cordoning off requirements for small items such as a battery, etc.

- 5. In the Report, Section 5, Odor Management Plan:
 - a. Section 5.5.1, Phase One of the Odor Remediation Plan states "Actions listed on this plan shall be implemented no later than two (2) weeks after receipt of a permit renewal for Friends Recycling, LLC by FDEP." The Department acknowledges this intent and will incorporate the implementation of Phase One of the Odor Remediation Plan as a Specific Condition in the permit renewal.

Response: Noted

b. Section 5.5.2.3 states, "The practice of mulching vegetative waste, storing and using the mulch as partial cover, shall be stopped. Mulch in the premises shall be handled as described above." Currently there is vegetative waste stockpiled at the facility. When Phase One is implemented ("Actions listed on this plan shall be implemented no later than two (2) weeks after receipt of a permit renewal for Friends Recycling, LLC by FDEP.") all stockpiled vegetative waste will be processed within that two week period or removed from the facility. Is this correct?

Response: Not exactly. One potential source of odors is the practice of using mulch as cover, or storing mulch on-site over an extended period of time. What we meant to say is that Friends will no longer use mulch as cover, and that Friends will no longer store mulch on-site over an extended period of time (two weeks or more).

Regarding the existing mound of vegetative debris (branches, trunks, etc.), we believe that this material in its current state does not pose a concern regarding the generation of noxious odors. This material will be mulched when economically feasible, and the mulch will be shipped off site within two weeks of its production.

"Economically feasible" is used here in the context of having a customer who would buy the mulch. This way the stockpile of branches will be consumed as the demand for mulch dictates. This ensures that mulch is produced when a client needs it, which means the mulch is quickly taken away from the facility.

- c. Section 5.5.4, "Odor Complaint Management"
 - I. The terms "legitimate" and "illegitimate" complaint can give the wrong impression to others. It may be interpreted that a statement is being made about the person or quality of the complaint. Please use the following terms:
 - "verified complaint" instead of "legitimate complaint"
 - "complaint" (no qualifying adjective) or "anonymous complaint" instead of "illegitimate complaint." Do not use the word "illegitimate" at all.
 - "ignored complaint" is allowed because it describes your action regarding the complaint, not a quality of the complaint.

Response: Noted. "Illegitimate" was changed to "Unverified", and "legitimate" was changed to "verified".

- d. Section 5.5, Phase One of the Odor Management Plan, has record keeping requirements but no reporting requirements. Reporting is necessary. It would be based upon the records kept at the facility. The Department recommends the following be added as Section 5.5.5, "Reporting:
 - I. The landfill operator will prepare a quarterly report detailing the Phase One Odor Management Plan actions. The report will be submitted for each calendar quarter, not later than the 15th day of the following month (that is, April 15, July 15, October 15, and January 15). The report can be submitted electronically to DEP_CD@dep.state.fl.us. The report will include the following:
 - A summary of odor complaints received by landfill personnel including date, time, and location of the complainant (if applicable);
 - A summary of actions taken to confirm the odor complaint (if applicable);
 - A summary of actions taken to mitigate the odor complaint (if applicable);

• Copies of correspondence sent by the landfill operator to the complainant, addressing their concerns and actions taken by landfill personnel to mitigate the source of odor (if applicable).

Response: Noted. The Odor Management Plan has been revised to include a reporting schedule.

- e. Section 5.6, Phase Two of the Odor Management Plan:
 - I. The Department does agree that Phase Two actions will be implemented incrementally. **Response:** Noted
 - ii. Section 5.6.1.2 indicates that Phase Two of the Plan will be implemented only under certain conditions and not before 24-months after implementation of Phase One. These conditions are not acceptable.

Response: Noted. Please see comments under iv. below.

iii. If Phase One does not resolve the odor complaints, Phase Two must be implemented within 30 days of notification by the Department. At that time we will work out a timeline for installation of stormwater controls, installation of passive landfill gas vents, and / or other actions. The timeline may include additional time to perform necessary engineering studies to ensure the actions will be successful.

Response: Noted. Please see comments under iv. below.

iv. Unless you have comments to the contrary, the Department will incorporate these requirements for the implementation of Phase Two of the Odor Management Plan as a Specific Condition in the permit renewal.

Response: On item e.ii above, you noted that our recommendation calls for implementation of Phase Two 24 months after a failed Phase One; You noted that such delay is not acceptable to the department.

The reason for the 24-month delay was to allow Phase One to effectively remove the odors, pertinent materials, and collect useful data (6-12 months); and to afford Friends Recycling time to retain a third-party expert who would analyze the data obtained during Phase One and conduct necessary studies to develop recommendations for implementation of Phase Two.

If said time-frame is not acceptable, Friends Recycling LLC, at a minimum, would like to replace the 24-month period with a period sufficient to retain the third-party expert to prepare recommendations for implementation of Phase Two. Please refer to the revised language, which hopefully addresses department's concerns and satisfy the needed time frame for Friends Recycling.

f. Section 5.6.4 is titled "Reporting and Monitoring." It should be titled "Landfill Gas Vents." **Response:** Noted and corrected.

- g. The Department recommends the following be added as Section 5.6.5, "Reporting:
 - I. The landfill operator will prepare a monthly report detailing the Phase Two Odor Management Plan actions. The report will be submitted for each month, not later than the 15th day of the month following the reporting month. The report can be submitted electronically to DEP_CD@dep.state.fl.us. The report will include the following:
 - A summary of odor complaints received by landfill personnel including date, time, and location of the complainant (if applicable);
 - A summary of actions taken to confirm the odor complaint (if applicable);
 - A summary of actions taken to mitigate the odor complaint (if applicable);
 - Copies of correspondence sent by the landfill operator to the complainant, addressing their concerns and actions taken by landfill personnel to mitigate the source of odor (if applicable).
 - A description of Phase Two actions taken during the previous month and an assessment whether they were effective
 - A description of Phase Two actions that are planned for the next three months.

Response: Noted. The Odor Management Plan has been revised to include a reporting schedule.

h. Please revise Section 5 to address the above comments.

Response: Noted. The Odor Management Plan has been revised to include a reporting schedule.

- 6. In the Report, Attachment 8 contains the submitted drawings. The following are comments regarding Attachment 8, Sheet 2 of 7.
 - a. Specific conditions 16 and 17 of Permit SO42-0019600-007 originally required the removal of waste from sub-cells 1B, 2B, and 2C. In the Department's December 29, 2008 letter (Enclosure 3) we said we were willing to modify both specific conditions. However, we cannot find a reply from Friends Recycling, Inc or its engineer about the proposed changes. The proposed modifications were:
 - Specific Condition 16: 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.
 - Specific Condition 17: 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 permitee 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).

i. The Department has not yet notified Friends that based on water quality results for MW#7 the waste in sub-cells 1B and 2C must be removed.

Response: That is our understanding as well.

- ii. The letter requested information about the timeline to switch residences from well to public utility provided water. Although we remember being told that the water main was installed, we cannot find documentation in our files that proves it was. Also, we do not have any documentation that proves all of the potable wells are no longer being used. Response: The potable water main was installed by the City of Ocala (a letter to this effect is included along with this response). The city has offered residents that they can connect free of connection fees and Friends Recycling LLC has offered to pay for several years of their water bills, residents can not be forced to connect to the water main. A map has been included showing which residences have connected to city water, but GDC has not been able to confirm if the wells were properly abandoned.
- iii. Are any of the potable wells to the west of the facility still being used, even though a public water supply is available? If yes, identify which wells. Use the well numbering shown on Sheet 6 of 6, "Wells Map," signed/sealed 1/25/2008 that was submitted in the permit application SO42-0019600-007.

Response: A map has been included showing which residences have connected to city water, but GDC has not been able to confirm if the wells were properly abandoned.

- iv. As part of your response to this request for additional information, please address the questions raised in the Department's December 29, 2008 letter and the comments above. Response: For comments above please see responses above. Immediately below are responses to letter dated December 29,2008.
- 1. Permit Specific Condition #16 states, "Sub-cells 1B and 1C: 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 repot 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.

Response: It is Friends Recycling LLC position that results from water quality testing for MW#7 provide no basis for concern at this time.

- 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 from completing the switching of residences from well to city water.
 - B. The Department is willing to Modify Permit Condition #17 to state: <u>Sub-Cell 2B:</u> Existing C&D waste within sub-cell 2B shall be removed within 9 months after notification from Department of 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)

Response: It is Friends Recycling LLC position that results from water quality testing for MW#6 provide no basis for concern at this time. Additionally, the potable water main has been installed and is available to the residents within the well setback free of connection charges.

b. Notes 2, 3 and the note in the middle of Cell #1 refer to "clean waste." The Department does not recognize the term "clean waste." Throughout the Report, this fill area is referred to as receiving "clean debris." It is the Department's understanding that these notes should read "clean debris." If you agree, when you revise this drawing ensure the words are changed to "clean debris." If not, please clarify what is meant by "clean waste."

Response: "Clean waste" in this context means "clean debris". Sheet 2 of 7 has been revised to replace "clean waste" with "clean debris" on notes #2 & 3 as well as on the note in the middle of Cell #1.

- c. There are multiple dashed and solid lines on the drawing. Provide a legend for the different lines. Response: The different dashed lines are intended to differentiate between distinctly authorized disposal areas. A note has been added to sheet 2 of 7 to help identify the meaning of the lines.
- d. A dashed line inside of the thick solid line is labeled "current waste footprint (typ)." This implies that waste has been approved and disposed in this area. This line also encompasses areas only approved for clean debris disposal, not waste. Waste has only been approved for disposal in the Sub-cell 1A and a portion of Sub-cell 2A. (A 1.36-acre area was approved on August 17, 2011. A 2.77-acre area was approved on March 3, 2009. Those two areas are properly depicted on Drawing Sheet 5 as Sub-cell 2A, "Active Excavation and Fill Area." A triangular area of Sub-cell 2A that had already been cleared and already contained waste was approved to receive more waste on October 24, 2008.)

Response: Because the facility has undergone ownership change no less than three (3) times and there is historical waste, there was confusion at our pre-application meeting in your office as to were the actual limits of waste were. I understood that we were asked to show what we believed the limits of waste to be (regardless of who or when it was placed).

That line is NOT intended to imply authorization to dispose within its boundaries. It means that we believe waste exists there, some placed more that 20 years ago. The dashed lines you referred-to on 7.c. above denote the areas we believe are currently authorized to receive waste (in addition to Cell #1A).

I. Was the waste removed from sub-cells 1B, 2B, and 2C? If yes, please provide the date of the documents submitted to the Department that the waste was removed. If waste was not removed, please explain the current situation. (See Item 6.a above.)

Response: No, waste has not been removed from cells #1B, 2B, 2C. Data from monitoring wells #7 and #6 have not indicated the need for concern at this time. If this positive trend continues, Friends Recycling, LLC has future plans to request authorization to dispose of "clean debris" on these sub-cells starting from existing topography.

ii. Explain the difference between the dashed line (current waste footprint) and the thick solid line (cell boundary).

Response: Please also refer to our response to question 7.d. above. The thick line represents what the department has approved as "Disposal Cells"; Within the "thick line" (or approved "disposal cells") only the following areas have been approved to actually start receiving waste: 1A and the dashed lines of 2A.

The thin dashed line labeled "current waste footprint" represents the footprint of all the waste ever placed in this property, including previous owners going back 20-30 years (historical waste). Again, the areas currently authorized to receive waste are Cell #1A and the dashed lines in sub-cell 2A.

iii. Depict all areas on the drawing where waste has been disposed.Response: That would be the thin dashed line labeled "current waste footprint".

iv. Depict all areas on the drawing where clean debris has been disposed.

Response: Clean debris has not been disposed off in this facility yet. On sub-cell 2C, which can only receive "clean debris" but has not yet been authorized to receive it, there is a stockpile of concrete rubble (considered "clean debris"). This stockpile is temporary while is being transferred and/or crushed. This clean debris will not be disposed off permanently on sub-cell 2C.

v. Depict all areas where waste has not yet been deposited.

Response: The areas which have not received ANY waste are identified as the difference between the "thick line" depicting the approved cell boundary, and the "thin dashed line" labeled "current waste footprint".

By inspection of these lines on sheet 2 of 7 you will notice that the areas which have not received any waste are the southern portion of sub-cell 2B, the southwest corner of sub-cell 2A and the southeast corner of sub-cells 2C and 1B.

e. Note 4 states "Cell Corner markers shall be installed prior to sub-cell receiving waste." The drawing should have different symbols for "installed" and "to be installed" corner markers.

Response: There is no difference since corner markers depicted on the revised sheet are installed as of the date of this response.

f. Provide a revised drawing that addresses the above comments.

Response: We have included revised drawings addressing the above comments and revised portions of the report.

- 7. The following are comments regarding Attachment 8, Sheet 5.
 - a. This drawing has the same issues as described in Item 6.b thru 6.e above.

Response: The responses to your comments 6.b thru 6.e apply to this as well. We have included a revised sheet 5 of 7.

b. As shown on Sheet 5, not all of sub-cell 2A has been approved to receive waste. There is a section between an approved area and the boundary with sub-cell 2B that has not yet been approved. Do you agree?

Response: That is correct. As explained earlier in this response, the only areas currently authorized to receive waste are Cell 1A and the portions of sub-cell 2A described by the dashed lines with dimensions.

c. A note in Sub-cell # 2B states "Prior to receiving waste, Cell 2 (or portions thereof) shall be graded so that the lowest bottom elevation is 64.00. Existing mounds of C&D debris may remain at elevations higher than 64.00." Is C&D waste still located in sub-cell 2B? Drawing Sheet 2 of 7 indicates it is. (See Item 6.a above.)

Response: Historical waste is located within portions of sub-cells 1B, 2C and 2B, as depicted by the thin dashed line labeled "current waste footprint". It is the intent of Friends Recycling LLC to place authorized "clean debris" over existing historical waste when economically feasible. At that time Friends Recycling LLC will apply for a construction permit to prepare the aforementioned sub-cells to receive the clean debris.

- d. A note pointing to Sub-cells # 1B and 2C states "Relocate normal C&D waste from subcells 1B & 2C into authorized cell. Only clean waste allowed in sub-cells 1B & 2C."
 - I. Is C&D waste still located in sub-cells 1B and 2C? Drawing Sheet 2 of 7 indicates it is. (See Item 6.a above.)

Response: Yes

ii. Change "clean waste" to "clean debris."

Response: Noted

e. Provide a revised drawing that addresses the above comments.

Response: Provided.

- 8. The following are comments regarding Attachment 4, Cost Estimate for Closure and Long- Term Care:
 - a. Provide supporting calculations for:
 - I. Unit calculations (quantity calculations) for top soil cover and vegetative layer
 - ii. Waste relocation cost (how much waste is assumed in this amount and at what disposal/hauling cost)

iii. Stormwater control systems (based upon the closure design)

Response: Supporting calculations for these three items are included.

- b. Provide third party quotes for the following closing costs:
 - I. Top soil cover (purchase, delivery and spreading)
 - ii. Vegetative layer (sodding and / or hydroseeding)

Response: Third party quotes are enclosed.

9. On page 4 of the submittal dated October 10, 2007 the facility noted that the operator would be directed to provide "Not for Drinking" or similar signs at each point where water can be accessed from well #19. The Department's response (dated November 9, 2007) noted that because you control the use of the water from Well #19, you can ensure it is not used for potable water; therefore, the 500 foot setback requirement does not apply.

In Section 2.5.1.2 of the current submittal, states, "...the operator is hereby required to label this well and all water outlets from this well as "Not For Drinking Water" or similar sign." Also, several of the maps including The Topographic Survey Sheet 2 of 2 note the well to be "Potable".

Currently the Department does not have reasonable assurance that the Well #19 has only been used for non-potable use. If inspections show that the signs have not been installed and maintained, the Department may require that Well #19 be added to the ground water monitoring plan and sampled semi-annually.

Response: Well #19 has been labeled on-site as "Non-Potable Water, Not For Drinking". The same signs have been installed at each faucet dispensing water from Well #19.





March 26, 2013

Jerry Lourenco Friends Recycling 2350 NW 27th Avenue Ocala, Florida 34475

Dear Mr. Lourenco,

I would like to express my sincere appreciation for your donation of the Right-of-Way and granting of Easements to facilitate the extension of the City water main and the paving of NW 31st Avenue along the West side of your property. Your neighborly actions have allowed the City to make water services and improved access available to the residents located in that area. On behalf of the City of Ocala, thank you very much.

Very Respectfully,

Sean Lanier, PE, CFM Director Public Works



March 26, 2013

Nick Giumarelli Friends Recycling 2350 NW 27th Avenue Ocala, Florida 34475

SUBJECT: FRIENDS RECYCLING WATER MAIN EXTENSION PROJECT, OCALA, FL

Dear Mr. Giumarelli,

In response to your request, attached is a copy of the Florida Department of Environmental Protection (FDEP) Clearance Letter for the Friends Recycling Water Main Extension Project (Clearance Date of 3/4/2010).

A clearance letter is given after the line is installed and tested to ensure water quality standards have been met. If the water quality standards are met, FDEP will then send an "official" clearance letter.

Also attached is an over-all aerial of the existing water mains and properties currently connected to City water.

We trust this information meets your needs. If we can be of further assistance, please contact us.

Sincerely,

Jeff Halcomb

Water & Sewer Director

SAB2 Holeon



Florida Department of Environmental Protection

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

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

March 4, 2010

City of Ocala 405 Se Osceola Avenue Ocala, Florida 34471

Attention: Bruce H. Phillips, P.E., P.L.S., Assistant City Manager/City Engineer Phillips,

Marion County - PW City of Ocala

Friends Recycling Water Main Extension

Dear Mr. Phillips:

This acknowledges receipt of certification that the subject water distribution system extension has been completed in accordance with the plans and related materials permitted by this agency on Permit Number WD42-0080629-327 dated January 13, 2010 and that the system has passed the pressure and bacteriological tests that were conducted in accordance with the AWWA Standards.

Based on this certification and satisfactory bacteriological results, we are clearing the system for service.

This constitutes the total clearance for this project. No additional clearances or construction are allowed under this permit.

The responsibility for the microbiological quality of the water at the time it ultimately reaches the consumer's meter remains entirely with the utility and/or the owner/operator of the system who should ensure that this quality remains as represented by the bacteriological test results presented. This letter of clearance does not preclude the need for obtaining acceptance by other entities as may be required.

Sincerely,

C.M. Padell

Cary M. Padell Engineer IV Drinking Water Permitting Supervisor

CMP/mn

c: Jeffrey Halcomb, Director of Water & Sewer Edward T. Earnest, Deputy City Engineer

bphillips@ocalafl.org; jhalcomb@ocalafl.org; eearnest@ocalafl.org;

From: John Zobler < JZobler@Ocalafl.org>

To: 'nicsprng@aol.com' <nicsprng@aol.com>

Cc: Marc Mondell <mmondell@Ocalafl.org>; James Haynes <JHaynes@Ocalafl.org>

Subject: Draft Letter to Area Residents re: water connection

Date: Thu, Mar 31, 2011 12:15 pm

Attachments: rev_Water_Connection_Payment_Offer.doc (24K)

Nick, attached is the draft letter that has been worked up pursuant to your request and offer. I have modified it to reflect your most recent conditional offer. The city must stay neutral on this issue and accordingly must be clear on that point in the letter. Please confirm your approval or otherwise indicate needed changes. We will send the letter out shortly after hearing from you.

Email Disclaimer: Please note — "Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing."

March 29, 2011

[Insert Address]

Dear Citizen:

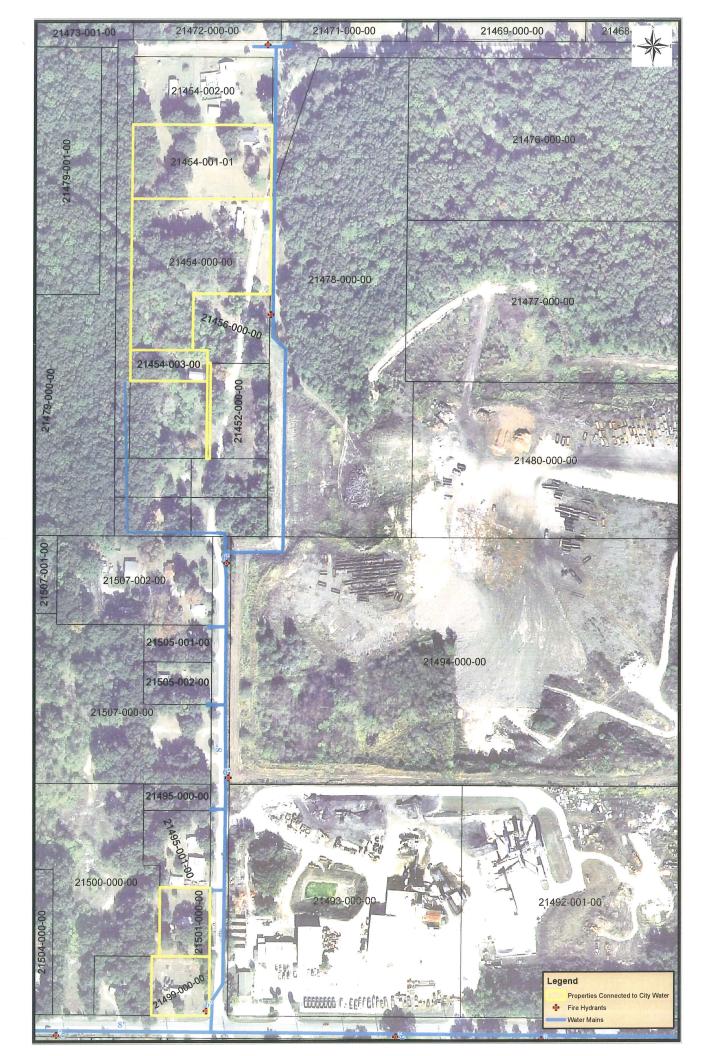
The City of Ocala does not currently provide your residence potable water service. Typically, the up front costs associated with connecting to the City's system includes impact fees, plumbing fees, and permit fees which for a 1,500sq.ft. house can on average cost the homeowner between \$2,500 and \$3,500. Once connected, the average charge for water service is between \$25 and \$30 per month.

If you are interested in obtaining city water service through the use of Community Development Block Grant (CDBG) funds, I encourage you to contact our office at the telephone number given below. If you qualify, the above installation costs will be paid from those funds

Alternatively, if you do not qualify for CDBG assistance, the City has recently been approached by an independent third party (Friends Recycling) which is offering to pay the entire up front costs to connect your residence to the City's system. In addition, they have offered to pay all of the monthly water charges until that time you no longer own the residence or the account is no longer in your name. This monthly payment arrangement will be by separate contract between you and Friends Recycling. They will be responsible for preparing and managing the contract and setting up the utility account with you. THIS PARTICULAR ALTERNATIVE OFFER FROM FRIENDS RECYCLING IS CONTINGENT UPON ALL AFFECTED PROPERTY OWNERS AGREEING TO CONNECT TO THE CITY'S WATER SYSTEM. If every contacted property owner in your area does not connect, Friends Recycling withdraws its financial assistance offer for all other property owners.

The City is <u>not</u> endorsing or requiring citizens to take advantage of this opportunity, any participation is <u>strictly voluntary</u>. The City is not aware of any current groundwater contamination or the potential or likelihood for any future groundwater contamination affecting your property.

In the event you are interested please contact James Haynes, Senior Manager at (352) 629-8261 who will seek to qualify you for CDBG assistance or, upon your approval, will forward your information to company representatives so they can provide you additional details.



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

Ocala, Marion County, Florida



GUERRA DEVELOPMENT CORPORATION

CIVIL AND STRUCTURAL ENGINEERING 2817 N.E. 3rd Street Ocala, Florida 34470 Ph: (352) 629-8060 email: guerracorp@att.net

Fuenz

Juan C. Guerra, P.E. Florida Reg. No. 0041000 3 / 2 8 / 13

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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 <u>SO42-0019600-005</u>. 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 <u>Disposal Area</u>: 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 = 28.8 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 Techical 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 <u>Available Volume Calculations</u>: 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 <u>Waste Disposal and Compaction Rates</u>: 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 weeks $/ 52 = 12.25 \sim 12$ years 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.	
MVV-1	18811	74.66	
MVV-5	22912	88.01	
MVV-6	22913	78.05	
MVV-7	22914	88.67	
MVV-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

Tese wells is 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, subcells 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 <u>not lower than elevation 64.0 NVGD</u>. 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. <u>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.</u>

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 <u>shall not</u> 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 unpractical 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
- Rocks
- Carpet remnant material from C & D activities or from carpet manufacturers
- 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.
- 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 onsite 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 Émergency 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 skeet 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

The 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 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

The operator is permitted and encouraged to exercise judgement as to amount of hazardous waste which requires reporting to the department. A single battery found, for example, can be considered hazardous waste but can be cleaned up, transported and disposed off at a permitted hazardous waste management facility, or placed in a hazardous waste container for disposal within 48 hours, without reporting tot he department.

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 dumspters 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 ODOR MANAGEMENT PLAN

5.1 BACKGROUND

- **5.1.1** The original Engineer's Report for Friends Recycling, LLC (Friends), contained provisions for Nuisance Control, including section 4.8.1, which specifically addressed nuisance odors.
- **5.1.2** After the 2008 permit was issued, Friends was made aware of odor-related complaints filed with DEP by nearby residents and/or their representatives, after which several visits and discussions held between DEP representatives and the owner/operators for Friends Recycling, LLC.
- **5.1.3** This culminated in a letter from DEP, dated May 18, 2010, signed by Mr. Thomas Lubozynski, P.E., Waste Program Administrator, on which specific actions were required of Friends, one of which was the preparation of a more detailed odor control program.
- **5.1.4** On behalf of Friends, Guerra Development Corp. (GDC) prepared a draft Odor Control Plan, dated August 17, 2010, which was submitted to DEP.
- **5.1.5** Odor complaints were referred to the City of Ocala and this got city officials involved in monitoring complaints, conducting site visits and meetings with residents, the Operator and DEP.

5.2 STATEMENT OF FACT

- **5.2.1** Friends Recycling, LLC is currently in compliance with permit requirements, as set forth in the permit conditions for permit #SO42-0019600-007.
- 5.2.2 Friends Recycling, LLC is a responsible operator for the permitted C&D debris disposal facility and it has been demonstrably responsive to rules, regulations and the welfare of the adjacent residents. For example, odor complaints have been acted upon, Friends has caused the installation of central City of Ocala water for residents on their west side, measures have been implemented to minimize impact to residents from nuisance sources such as dust, noise and odors.
- 5.2.3 Following odor complaints, multiple site visits and inspections by DEP officials, City of Ocala representatives and from Friend's personnel, have not been able to confirm the severity and frequency of the odor problems as stated in the complaints. Friends has not construed this to mean that no odor ever reaches the adjacent properties under certain climatic and atmospheric conditions.
- **5.2.4** From recent historical evidence, DEP and members of the C&D industry have realized that practices previously thought to mitigate odors may indeed increase their potential, such as crushing and pulverizing gypsum wallboard prior to disposal.
- **5.2.5** Recent anecdotal evidence from C&D facility operators in the central Florida area suggests that expensive and complex systems for odor control are no more effective than simpler and more cost efficient methods such as additional soil cover.

5.3 FOCUS OF THE ODOR MANAGEMENT PLAN

- **5.3.1** GDC has identified three primary potential sources of nuisance odors at Friends. This Odor Management Plan will focus on these which could make the most difference in mitigating odors:
 - 5.3.1.1 Old Waste
 - 5.3.1.2 New Waste
 - 5.3.1.3 Temporary Storage of non-permitted waste
- **5.3.2 Old Waste**: Waste previously deposited in cells at Friends may be causing occasional odor emissions. Application of additional soil cover is one of the methods used with success.

As example of this procedure, a couple of locations were identified as minor sources of on-site odors where older waste was deposited. These areas were provided with an additional 12 inches of soil cover and the odor has ceased.

5.3.3 New Waste: Friends is voluntarily removing certain items form the approved materials list. The old practice of mulching vegetation and using the mulch for cover has been stopped; decomposing mulch was generating odors.

Gypsum wallboard, which in its decomposing state is believed to be the primary source of odors in old and new waste, will no longer be disposed of at Friends. The gypsum wallboard will be sorted out and stored for hauling offsite. This shall not be interpreted to mean that Friends will be in violation of the Odor Management Plan if small and sporadic pieces of gypsum wallboard embedded in the waste stream and which are impractical to remove, make it to the disposal cell.

5.3.4 Temporary Storage: Although not believed to be the source of odors generating the complaints, temporary storage of non-permitted waste, such as putrescibles, new gypsum wallboard, has the potential to generate odors.

This Odor Management Plan sets forth procedures to ensure that the residency time for such waste is short enough to prevent nuisance odor generation.

5.3.5 Complaint Management Protocol: As a good neighbor, Friends interprets verified complaints as opportunities to better manage and operate their facility, and as helpful outside indicators of areas which need additional attention. This Odor Management Plan sets forth procedures to ensure that surrounding community concerns are addressed by Friends in a timely and effective manner, and that complaints are utilized to assess the effectiveness of procedures already in place.

5.4 ODOR MANAGEMENT PLAN PHASING

- **5.4.1** Implementation of the Odor Management Plan has been arranged to start with the most effective and simple procedures, then if needed, progressively advance to more complex and expensive methodologies.
- **5.4.2** Phase One, shall be implemented by Friends upon approval by FDEP of this application for permit renewal. This initial phase presents the greatest potential for reduction of future nuisance odors and mitigates current nuisance odors.

5.4.3 Phase Two, a more involved, time-consuming and expensive approach, shall be put into action in the event that Phase One has been demonstrated inadequate by the FDEP.

5.5 PHASE ONE OF THE ODOR MANAGEMENT PLAN

5.5.1 Actions listed on this plan shall be implemented no later than two (2) weeks after receipt of a permit renewal for Friends Recycling, LLC by FDEP.

5.5.2 OPERATING PROCEDURES FOR ODOR MANAGEMENT

- **5.5.2.1** Non-permitted waste, including putrescible material, shall be removed from the site on a daily basis.
- **Mulch** shall not be accepted as waste unless it is disposed of immediately and covered with 12" of waste, or alternatively with 2-4 inches of soil.
- **The practice of mulching vegetative waste**, storing and using the mulch as partial cover, shall be stopped. Mulch in the premises shall be handled as described above.
- 5.5.2.4 Gypsum wallboard has been identified by DEP as one of the primary sources of nuisance odors in C & D disposal facilities. Friends has voluntarily decided to stop disposing of gypsum wallboard on-site. Gypsum wallboard shall be sorted out like non-permitted waste, stored away from the disposal cell and hauled off site on a weekly basis.

No section of this Odor Management Plan shall be interpreted as preventing Friends from disposing on-site of minor, smaller pieces of gypsum wallboard which may be embedded in the waste stream and which may be impractical to remove.

- 5.5.2.5 <u>Compaction:</u> Material placed in the disposal cells shall be thoroughly compacted to eliminate voids and to enhance water runoff from the surface of the compacted waste.
- 5.5.2.6 <u>Interim Storm Water Runoff Management:</u> Temporary drainage improvements shall be constructed to minimize runoff from coming into contact with the waste stream.
 - 5.5.2.6.1 Berms and/or swales shall be constructed to prevent runoff to flow into uncapped cells. Runoff flowing from the higher portions of Cell #1 currently flow south into the active cells #2A. Berms and swales shall be constructed to convey runoff around Cell #2A.
 - 5.5.2.6.2 Disposal cells which trap water, such as depressed pits, shall be graded temporarily so that the bottom slopes away from the active area of the cell. Temporary ditches and depressions may be excavated at the bottom of the cell to accumulate runoff away from under the waste mound.
 - 5.5.2.6.3 Friends shall retain the services of Florida Registered Professional Engineer to prepare Interim Drainage Plans, and to make monthly inspections to ensure that Interim Drainage meets the performance criteria set forth by this Odor Management Plan.

- **Nuisance Odor Survey:** Implementation of this Odor Management Plan includes conducting regularly scheduled nuisance odor surveys as described in a subsequent section of this report
- **5.5.2.8** Odor Complaint Management Protocol: Upon receipt of the approved permit renewal, Friends shall implement the Complaint Management Protocol described in a subsequent section of this report.
- 5.5.2.9 Interim Soil Cap: Upon detection of nuisance odors, weather by random detection, or from the regularly scheduled Nuisance Odor Survey, or from a complaint, the source area should be identified and provided with a 6" thick soil cap. If 48 hours later it is found that this cover was inadequate, an additional 6" soil cap shall be installed over nuisance odor the source area.

5.5.3 NUISANCE ODOR SURVEY

5.5.3.1 ON-SITE FOR ACTIVE CELLS

- 5.5.3.1.1 WHEN: Once in the early morning, at the start of operations, AND, once in the evening, at closing time.
- 5.5.3.1.2 WHERE: A designated employee from Friends Recycling shall walk the perimeter of the active cell, and, walk in a serpentine pattern across the top of the active cell.
- 5.5.3.1.3 PURPOSE: To identify the presence and source area of nuisance odors.
- 5.5.3.1.4 ACTION: Areas identified during the survey walk as nuisance odor generators shall be provided with additional waste cover until the odor ceases. If the odor does not cease with the placement of additional waste, an interim soil cap shall be provided as described in the Operating Procedures for Odor Management.

5.5.3.2 ON-SITE FOR INACTIVE CELLS

- 5.5.3.2.1 WHEN: Once in the evening, at closing time on Friday or the last work day of the week. When verified active complaints are received, the schedule of Nuisance Odor Surveys for inactive cells shall be the same as the one for active cells, as described above.
- 5.5.3.2.2 WHERE: A designated employee from Friends Recycling shall walk in a serpentine pattern across the top of the inactive cell.
- 5.5.3.2.3 PURPOSE: To identify the presence and source area of nuisance odors.
- 5.5.3.2.4 ACTION: Areas identified during the survey walk as nuisance odor generators shall be provided with an interim soil cap as described in the Operating Procedures for Odor Management. If the 12" soil cover does not satisfactorily control the nuisance odor, the engineer of record shall be contacted for further evaluation.

5.5.3.3 OFF-SITE

- 5.5.3.3.1 WHEN: Once in the early morning, at the start of operations, AND, once in the evening, at closing time.
- 5.5.3.3.2 WHERE: A designated employee from Friends Recycling shall

- conduct an odor survey of the perimeter of the Friends Recycling facility. Additionally, the western boundary of the facility shall be inspected by foot.
- 5.5.3.3.3 PURPOSE: To identify the presence and source area of nuisance odors.
- 5.5.3.3.4 ACTION: Upon discovery of nuisance odors, the source location shall be identified taking into account actual wind conditions. Nuisance odor source areas shall be provided with additional cover waste until the odor ceases. In the event that odor does not cease with the placement of additional waste, a soil cover of 12" shall be placed over the problem areas.

5.5.3.4 NUISANCE ODOR SURVEY LOG

- 5.5.3.4.1 Friends Recycling shall create a log document to be kept at the facility at all times. Monitoring of nuisance odors shall be logged by recording, as a minimum, the following information:
 - 5.5.3.4.1.1 Date and time of the inspection
 - 5.5.3.4.1.2 Name and signature of employee conducting the survey.
 - 5.5.3.4.1.3 Environmental conditions, such as estimated wind direction and speed, rain or clear skies.
 - 5.5.3.4.1.4 Areas surveyed, as a minimum, active cell number, inactive cell number, offsite and offsite along west boundary of the facility.
 - 5.5.3.4.1.5 Results of the inspection denoting whether or not nuisance odors were detected.
 - 5.5.3.4.1.6 If nuisance odors were detected, note the location and relative strength.
 - 5.5.3.4.1.7 Note the source area of the odor
 - 5.5.3.4.1.8 Note the action taken to mitigate the nuisance odor.
- 5.5.3.4.2 An official Inspection Log Book shall be maintained at the on-site offices of Friends Recycling, LLC, and shall be available to DEP representatives for inspection during regular business hours.

5.5.4 ODOR COMPLAINT MANAGEMENT PROTOCOL

- **5.5.4.1** Friends Recycling, LLC (Friends) shall prepare and maintain a log for odor complaints. This log shall be available at the offices of Friends during regular business hours.
- 5.5.4.2 It shall be the facility operator's responsibility to prepare, maintain and make appropriate entries into the log. The Operator may designate an employee of Friends to keep the log, but it shall ultimately be the operator's responsibility to keep the log in accordance with ths protocol.
- **5.5.4.3** Complaints shall be categorized in to three (3) groups:
 - 5.5.4.3.1 Verified Complaints are hereby defined as those for which:
 - 5.5.4.3.1.1 The complainant provides name, address or other means of contacting the complainant back.

- 5.5.4.3.1.2 The complainant provides credible and sufficient data to adequately investigate the complaint.
- 5.5.4.3.1.3 The nature of the complaint has been verified by either personnel from Friends, FDEP representatives or City of Ocala officials.
- 5.5.4.3.2 Unverified Complaints are hereby defined as those which do not meet the prerequisites of a Verified Complaint as described above.
 - 5.5.4.3.2.1 Anonymous complainants.
 - 5.5.4.3.2.2 Not enough information to investigate the claims.
 - 5.5.4.3.2.3 The claims could not verified by either employees of Friends, FDEP representatives or City of Ocala officials.
- 5.5.4.3.3 Ignored Complaints are hereby defined as those unverified complaint on which the complainant uses vulgar or abusive language, or make threats or allege false accusations against Friends personnel or their subcontractors.

5.5.4.4 Verified Complaints

- 5.5.4.4.1 Upon receipt of a verified complaint, the complainant's information shall be entered in the log.
- 5.5.4.4.2 A Friends employee (Inspector) shall immediately drive to the location identified by the complaint, and offer to meet the complainant at said location to confirm the nature of the complaint.
- 5.5.4.4.3 The Inspector shall remain in public property unless invited by the owner to enter the property of the complainant.
- 5.5.4.4.4 The Inspector shall walk the area of the complaint for at least 10 minutes to account for momentary atmospheric variations (wind direction shift, wind speed change), and check for the presence of nuisance by means of smelling.
- 5.5.4.4.5 If the presence of nuisance odors is detected:
 - 5.5.4.4.5.1 The Inspector shall attempt to identify the source location (old waste, new waste, temporary storage, etc.)
 - 5.5.4.4.6 Upon identification of the source location for the nuisance odor, Friends shall take immediate action to mitigate the odors by using methods outlined in this Odor Management Plan, such as installing an Interim Soil Cap.
- 5.5.4.4.7 The Inspector shall enter the results of the inspection and any action taken in the log.
- 5.5.4.4.8 Friends shall respond to the complainant in writing, email or other methods which leaves a paper trail, and advise the complainant of the results of the inspection, actions taken or future measures to be implemented.

5.5.4.5 Unverified Complaints

- 5.5.4.5.1 If not enough information was received to identify the general direction of the alleged odor problem, a Friends employee (inspector) shall walk the perimeter of the waste within the Friends property.
- 5.5.4.5.2 If no odors are detected by the Inspector by means of smelling, an entry shall be made in the log to document the event.
- 5.5.4.5.3 If an odor is detected by the Inspector by means of smelling, then the same procedures shall be taken as for a verified complaint, including log entry.

5.5.4.6 Ignored Complaints

5.5.4.6.1 No action taken other than making an entry in the log stating that an Ignored Complaint was received on the date and time applicable, and the reasons why it was deemed an Ignored Complaint.

5.5.5 REPORTING

- The landfill operator will prepare a quarterly report detailing the Phase One Odor Management Plan actions. The report will be submitted for each calendar quarter, not later than the 15th day of the following month (that is, April 15, July 15, October 15, and January 15). The report can be submitted electronically to DEP_CD@dep.state.fl.us. The report will include the following:
 - A summary of odor complaints received by landfill personnel including date, time, and location of the complainant (if applicable);
 - A summary of actions taken to confirm the odor complaint (if applicable);
 - A summary of actions taken to mitigate the odor complaint (if applicable);
 - Copies of correspondence sent by the landfill operator to the complainant, addressing their concerns and actions taken by landfill personnel to mitigate the source of odor (if applicable).

5.6 PHASE TWO OF THE ODOR MANAGEMENT PLAN

5.6.1 Implementation

- 5.6.1.1 Phase Two of the Odor Management Plan shall be considered as an incremental program. All requirements set forth by the Phase One of the Odor Management Plan shall continue to be implemented in addition to those described below.
- 5.6.1.2 Phase One shall be allowed to work for twelve (12) months. If after the twelve-month period, the department determines through scientific evidence that Phase One is inadequate, the landfill operator shall have thirty (30) days to present Phase Two Implementation Plan.
- 5.6.1.3 Scientific Evidence shall be construed as a as a long-term study by a Florida Licensed professional with documented expertise in the subject of industrial nuisance odors.

- 5.6.1.4 The Phase Two Implementation Plan shall consist of a study, design and schedule for implementation of Phase Two, prepared by a Florida licensed professional.
- 5.6.1.5 Elements listed below make part of Phase Two of the Odor Management Plan, and may be implemented in part if said part alone is believed to be sufficient to address pertinent issues.

5.6.2 Detailed Interim Drainage Plan

5.6.2.1 Friends Recycling, LLC shall retain Guerra development Corp, or other Florida Licensed professional engineering firm with experience in C & D landfills and drainage, to prepare a detailed interim drainage plan to provide flow routes, conveyance and management of runoff with the express goal of reducing the potential for infiltration of rainwater into the waste areas.

5.6.3 Excavate interim cell runoff storage

- 5.6.3.1 This may be implemented as part of the above item, Detailed Interim Drainage Plan, or on its own.
- Interim cell runoff storage shall consist of grading the bottom of the remainder of the active cell away from the waste area, and providing specific storage volume determined by the engineer of record for the project. The express goal of this action is to allow infiltrated rain water to seep to the bottom of the waste mound and then flow away from the waste to an interim runoff storage depression.

5.6.4 Landfill Gas Vents

- 5.6.4.1 If off-site verified nuisance odor complains continue to be received by FDEP and Friends Recycling, LLC, supported by nuisance odors surveys as described earlier in this plan, Friends Recycling, LLC, will prepare a gas monitoring plan and present it to FDEP for review and approval.
- Gas monitoring plan may consist of the installation of three (3) 2" PVC vents with valves, to be used as a program to sample the gas at each vent at quarterly intervals.
- In the event the sampling of vents reveals a significant amount of gas, most likely hydrogen sulfide (H₂S), the plan shall be amended to determine the gas mitigation procedure Venting at times of desirable atmospheric conditions or by the installation of vent flares.

5.6.5 REPORTING

5.6.5.1 The landfill operator will prepare a monthly report detailing the Phase Two Odor Management Plan actions. The report will be submitted for each month, not later than the 15th day of the month following the reporting month. The report can be submitted electronically to DEP_CD@dep.state.fl.us. The report will include the following:

- A summary of odor complaints received by landfill personnel including date, time, and location of the complainant (if applicable);
- A summary of actions taken to confirm the odor complaint (if applicable);
- A summary of actions taken to mitigate the odor complaint (if applicable);
- Copies of correspondence sent by the landfill operator to the complainant, addressing their concerns and actions taken by landfill personnel to mitigate the source of odor (if applicable).
- A description of Phase Two actions taken during the previous month and an assessment whether they were effective
- A description of Phase Two actions that are planned for the next three months.

6 CLOSURE PLAN

- 6.1 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.
- 6.2 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.
- 6.3 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.
- 6.4 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.
- 6.5 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)©).
- 6.6 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.
- 6.7 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.
- 6.8 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..

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

8 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.

9 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.

10 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.

11 TRAINING PLAN

11.1 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.

11.2 Definitions

- 11.2.1 "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".
- **"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.
- 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.
- **"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".

11.3 Training Requirements

- 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.
- 11.3.2 <u>Operators:</u> 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.

11.3.3 <u>Spotters:</u> 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.

11.4 Approved Training

- 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.
- 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.
- 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.
- 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

- 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.
- 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. <u>Retake same class for renewal not later than January 2009.</u> 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.

12 LONG TERM CARE PROVISIONS

12.1 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.

12.2 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.

12.3 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.

12.4 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.

12.5 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.

12.6 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.

12.7 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.

12.8 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 ------

IV. ESTIMATED CLOSING COST (check what applies)

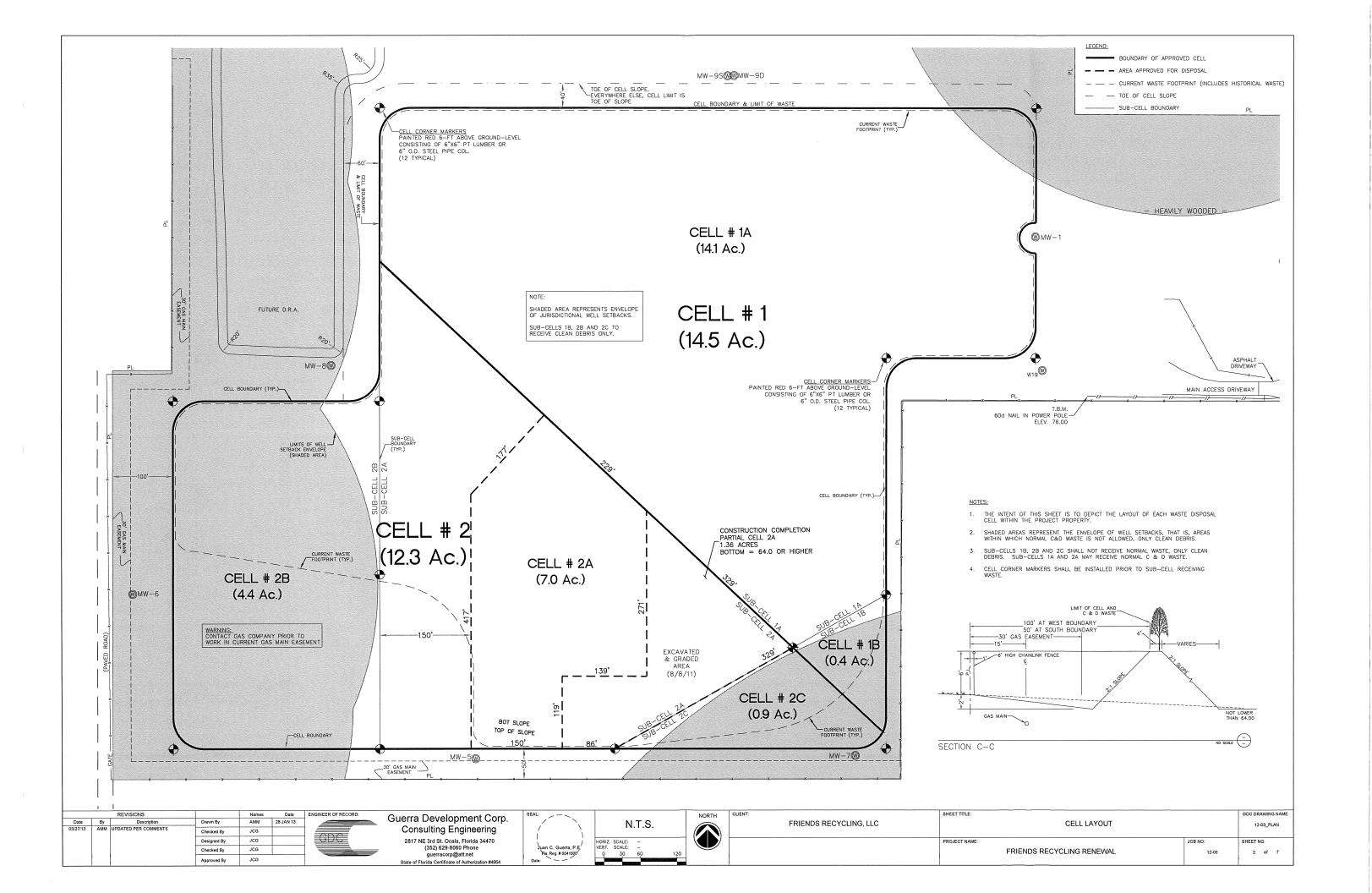
★ Recalculated Cost Estimate □ New I	Facility Cost Estimate
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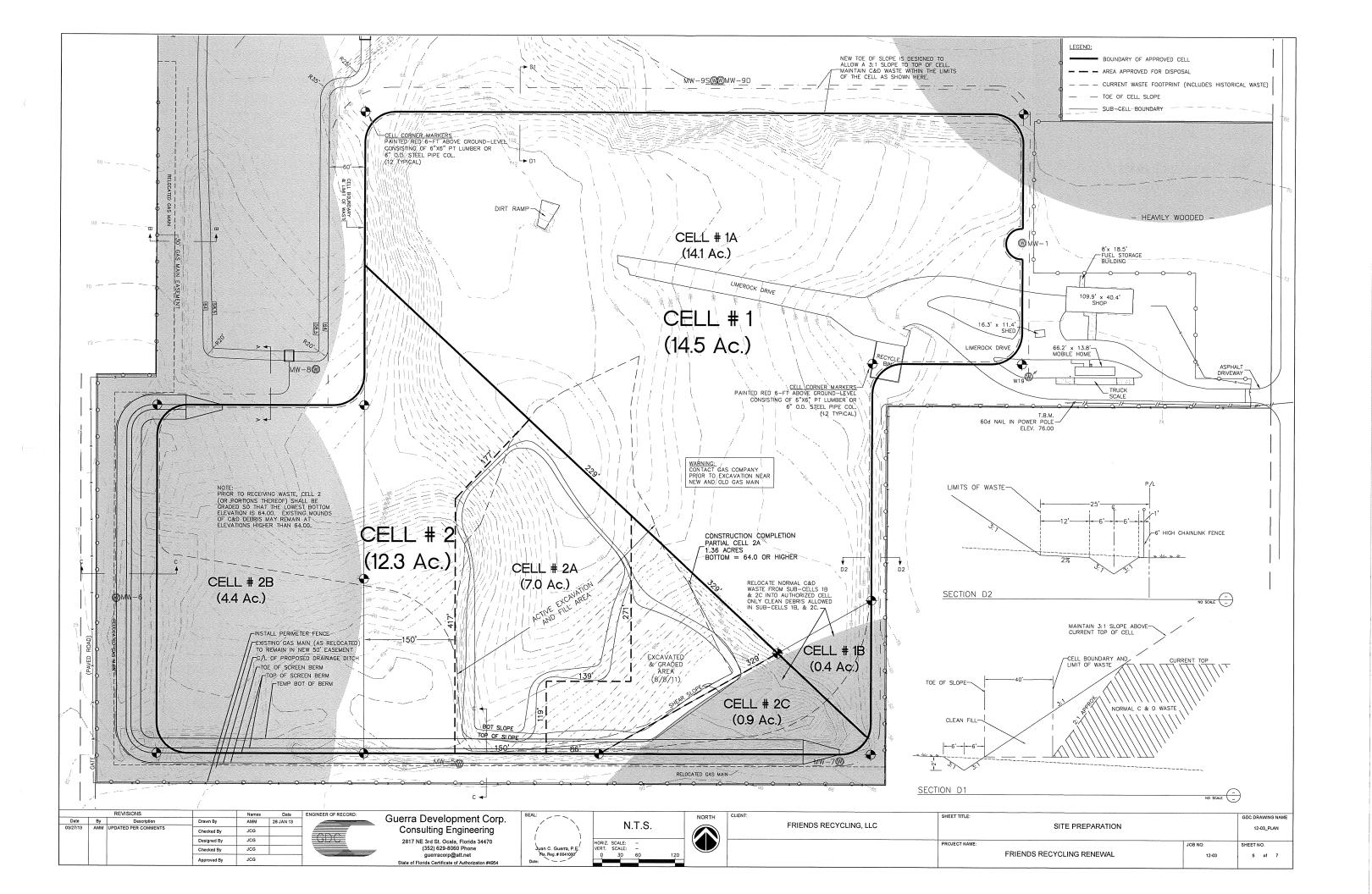
Notes: 1. Cost estimates for the time period when the extent and manner of landfill operation makes closing most exp

- 2. Cost estimate must be certified by a professional engineer.
- 3. Cost estimates based on third party suppliers of material, equipment and labor at fair market value.
- 4. In some cases, a price quote in support of individual item estimates may be required.

Number						
Description	Unit	of Units	Cost / Unit	Total Cost		
1. Proposed Monitoring Wells	(Do not incl	ude wells alread	y in existence.)			
	EA	***************************************				
		Subtotal Proposed Monitoring Wells:				
. Slope and Fill (bedding layer	between was	te and barrier lay	/er):			
Excavation	CY	***************************************				
Placement and Spreading	CY					
Compaction	CY					
Off-Site Material	CY					
Delivery	CY			****		
			Subtotal Slope and Fill:			
. Cover Material (Barrier Layer)):		_			
Off-Site Clay	CY					
Synthetics - 40 mil	SY					
Synthetics - GCL	SY					
Synthetics - Geonet	SY	· · · · · · · · · · · · · · · · · · ·	-			
Synthetics - Other (explain)						
			Subtotal Cover Material:			
. Top Soil Cover:	-		_			
Off-Site Material	CY	60,466	\$2.25	\$136,048.50		
Delivery	CY	86,356	\$1.95	\$168,394.20		
Spread	CY	86,356	\$0.75	\$64,767.00		
			Subtotal Top Soil Cover:			
. Vegetative Layer			- Custotal Top Coll Cover.	\$369,209.70		
Sodding	SY	101,958	\$2.00	¢202 046 00		
Hydroseeding	AC	12	\$4,100.00	\$203,916.00		
Fertilizer	AC	12		\$49,200.00		
Mulch	AC		\$1,200.00	\$14,400.00		
Other (explain)	Α0					
			Subtotal Vegetative Layer:			
. Stormwater Control System:	-		Subtotal vegetative Layer.	\$267,516.00		
Earthwork	CY					
Grading	SY					
Piping	LF	2,020		AFO =00 f =		
Ditches		4,470	\$26.50	\$53,530.00		
	LF	7,470	\$8.25	\$36,877.50		
Berms	LF					
Control Structures	EA		\$1,500.00	\$31,500.00		
Other (explain)	-					
PROPERTY AND ADDRESS OF THE PROPERTY A	-	Subtotal S	Stormwater Control System: _	\$121,907.50		

		Subtotal of 1-11 Above:	\$811,573.20
12.	Contingency 10 % o	of Subtotal of 1-11 Above	\$81,157.32
		Subtotal Contingency:	\$81,157.32
		Estimated Closing Cost Subtotal: _	\$892,730.52
	Description		Total Cost
13.	Site Specific Costs		
	Mobilization		\$12,000.00
	Waste Tire Facility	_	THE LAND OF THE PARTY OF THE PA
	Materials Recovery Facility	_	
	Special Wastes	_	
	Leachate Management System	Modification	
	Other (explain) Waste Relocation		\$75,000.00
		Subtotal Site Specific Costs:	\$87,000.00
		TOTAL ESTIMATED CLOSING COSTS (\$):	\$979,730.52





Friends Recycling - C&D Disposal and Recycling Marion County - SW WACS #21012 Permit Application No. 0019600-008-SO-24 March 26, 2013

IV. CLOSING COSTS - EXPLANATION

4. Top Soil Cover:

Sloped area = 669,446 sf (slopes and benches)

Top area = 496,366 sf

Total area = 1,165,812 sf = 129534 sy

Cover depth = 2 ft

Cover volume = 2,331,624 cf = 86,356 cv

DRA At = 300,776 sf

DRA Ab = 258,432 sf

DRA Aa = 279,604 sf

DRA D = 5.5 ft

DRA D net = 5.0 ft (lost to clearing)

DRA V = 1,398,020 cf = 51,778 cy

DRA usable soil for cover (50% per boring) = 25,889 cy

Off-site material = 86,356 - 25,889 = 60,466 cy

Delivery (on-site) = 25,889 cy (3) 1.00/cy

Delivery (off-site) = $60,466 \text{ cy} \ \text{@} \ \$2.25/\text{cy}$

Delivery Net = 86,356 cy @ \$1.87/cy

Spread = 86,356 cy @ \$0.75/cy

5. Vegetative Cover:

Sodding = Slopes, Benches and 50% of top = 669,446 + (0.5x496,366) = 917,629 sf = 101958 syHydroseeding = 50% top+disturbed areas = 250,000 + 255,000 = 505,000 sf = 11.6 ac

6. Stormwater:

Earthwork= 51,778 cy. This cost is not used because the cost of relocating the waste outside of well setbacks is included. If a third party has to relocate the waste, that means the pit was not filled, which means that the volume provided by the DRA is not needed.

Piping= This cost was included because runoff still has to be routed to the pit.

9. Security System:

The security system is passive and it consists of fences and gates.

Fencing= The length shown is for fencing not constructed yet. 1,400 lf

13. Site Specific:

Other= Cost of relocating waste from well setbacks

2 laborers with 2 machines for 8 months

2 laborers at $1,800/\text{wk} \times 8 \text{ months} = 14,400 \times 2 = 28,800$

2 machines @ $7,500/month \times 8 months = $60,000 = $120,000$

Fuel = 11,500 gal @.\$3.50/gal = \$40,250 x 2 = \$80,500

Total = \$229,300

As verification of this cost, a different approach is used.

Gross Area of waste to be relocated = portions of Cell 2B+2C+1B=77,552+20,775+8,634 = 106,961 SF

Estimated Average Depth of waste to be relocated = 12 Ft

Estimated Volume to be relocated = $106,961 \times 12 = 1,283,532 \text{ CF} = 47,538 \text{ CY}$

Cost per CY = \$4.50 / CY

Total cost = 47,538 CY x 4.50 /CY = 213,921 < than 229,300 ==> Ok !

From: Stan Salser (stan@salserconstruction.com)

To: guerracorp@att.net;

P *e: Wed, March 27, 2013 10:54:35 AM

Subject: friends recycling land fill closing

Mr. guerra,

The following is our unit price for delivery and grading of top soil at the land fill also sod and hydroseeding as needed.

\$5.00 sy Import top soil

\$2.00 sy sod installed

\$.85 hydroseeding

Thank you for the opportunity to submit this quote

Stan Salser

President

