



225 East Robinson Street, Suite 100
Orlando, Florida 32801
Phone: 407 649-5475
Fax: 407 649-6582
Web: www.hsagolden.com

November 15, 2004

Via UPS

Mr. James N. Bradner, P.E.
Program Manager, Solid & Hazardous Waste
Department of Environmental Protection
3319 Maguire Blvd, Suite 232
Orlando, Florida 32803-3767

Subject: **Taft Recycling, Inc., TS/MRF-WPF**
Modification of SO48-0173968-002
Permit Application No. SO48-0173968-004
Project No. 04-297.001

Dear Mr. Bradner:

On behalf of Taft Recycling, Inc. (Taft), HSA Golden is responding to your comment letter on the subject Waste Processing Facility (WPF) permit modification application dated October 26, 2004. Hereafter, we restate your comments and respond accordingly.

Comment 1: Submit proof to the Department that the local government was notified prior to completion of application and not prior to permit issuance.

Response: Proof of local government notification is attached.

Comment 2: A financial mechanism must be funded in the amount specified in the approved cost estimate and accepted by the Department's Financial Coordinator before this application can be deemed complete. Financial responsibility arrangements for the facility for the approved amounts are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and **a copy of the approval letter submitted to:** Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.

Response: A copy of the bond, funded in the approved cost estimate amount, that was submitted to the Financial Coordinator, Frank Hornbrook, is attached. The approval letter should be forthcoming.

We trust that our response will allow approval of the subject permit modification. Please call if you have any questions.

Sincerely,

HSA GOLDEN

 11/15/04
James E. Golden, P.G.

Vice President, Principal Hydrogeologist

Attachments

Copy to: Addressee (3)
Mr. Bill Condrón
Mr. Mike Massaro



225 East Robinson Street, Suite 100
Orlando, Florida 32801
Phone: 407 649-5475
Fax: 407 649-6582
Web: www.hsagolden.com

BUILDING DIVISION

2004 NOV 15 AM 10:11

November 15, 2004

Mr. Dave Seamans
Building Division
Orange County Growth Management Department
201 South Rosalind Avenue, First Floor
Orlando, Florida 32801

Subject: **Taft Recycling, Inc. Waste Processing Facility**
375 7th Street, Taft, Florida
Project No. 04-297.001

Dear Mr. Seamans:

On behalf of Taft Recycling, Inc. (Taft), HSA Golden is notifying Orange County of the filing with the Florida Department of Environmental Protection a permit modification application for expansion of the subject waste processing facility. This notification is required pursuant to Florida Statute Chapter 403.707(14). Taft plans to schedule a pre-application meeting with your Division within the next few weeks.

Sincerely,

HSA GOLDEN

A handwritten signature in dark ink, appearing to read 'J. Golden', is written over a horizontal line.

James E. Golden, P.G.
Vice President, Principal Hydrogeologist

Copy to: Mr. Mike Massaro, Taft Recycling, Inc.
Mr. James Bradner, P.E., FDEP

This bond replaces previous Carolina Casualty Insurance Company bond number 079138.

DEP Form 2 (02-701,200)(SH)
Form Title 2004 Env. Financial Guarantee Bond
Effective Date _____
DEP Application No. _____

**STATE OF FLORIDA
SOLID WASTE MANAGEMENT FACILITY FINANCIAL GUARANTEE BOND
TO DEMONSTRATE FINANCIAL ASSURANCE
FOR**

☒ Closing ☐ Long-Term Care ☐ Corrective Action
[Check appropriate box(es)]

The term "Required Action" as used in this document means closing, long-term care, or corrective action, or any combination of these, which is checked above.

Date bond executed: NOVEMBER 11, 2004

Effective date: NOVEMBER 11, 2004

Principal: TAFT RECYCLING, INC.

1099 MILLER DRIVE, ALTAMONTE SPRINGS, FL 32701

Legal Name and Business Address of Owner or Operator

Type of Organization: ☐ Individual ☐ Joint Venture ☐ Partnership ☒ Corporation

Check One

State of Incorporation: Florida

Surety(ies): CAROLINA CASUALTY INSURANCE COMPANY

2850 W. GOLF ROAD, SUITE 800

ROLLING MEADOWS, FL 32008

Name(s) and Business Address(es)

List for each facility: FDEP Identification Number, name, and address. Indicate "Required Action" amounts for each facility separately.

<u>FDEP I.D. No.</u>	<u>Name</u>	<u>Address</u>	<u>Required Action Amount</u>
	S. Orlando T.S.	375 - 7th Street	89,110.12
	Taft Recycling, Inc.	Taft, FL 32824	

Total penal sum of bond: \$ 89,110.12

Surety's bond number: 097944

Bond premium: \$ 891 annually

Know All Persons By These Presents, That we, the Principal and Surety(ies) hereto are firmly bound to the Florida Department of Environmental Protection (hereinafter called FDEP), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally; provided that, where the Sureties are corporations acting as co-sureties, we, the Sureties, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be full amount of the penal sum.

WHEREAS, said Principal is required, under the Florida Solid Waste Management Act as amended, to have a permit in order to construct, operate or close each solid waste management facility identified above, and

WHEREAS, said Principal is required to provide financial assurance for the "Required Action," as a condition of the permit(s), and

WHEREAS, said principal shall establish a standby trust fund as is required when a surety bond is used to provide such financial assurance;

NOW, THEREFORE, the conditions of the obligation are such that if the Principal shall faithfully, before the beginning of final closure of each facility identified above, fund the standby trust fund in the amount(s) identified above for the facility,

Or, if the Principal shall fund the standby trust fund in such amount(s) within 15 days after an order to begin closure is issued by the Secretary of the FDEP, or the Secretary's designee (the "designee"), or a U.S. district court or other court of competent jurisdiction,

Or, if the Principal shall provide alternate financial assurance and obtain the FDEP Secretary's, or designee's, written approval of such assurance, within 90 days after the date of notice of cancellation is received by both the Principal and the FDEP Secretary, or designee, from the Surety(ies), then this obligation shall be null and void, otherwise it is to remain in full force and effect.

The Surety(ies) shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above. Upon notification by the FDEP Secretary, or designee, that the Principal has failed to perform as guaranteed by this bond, the Surety(ies) shall place funds in the amount guaranteed for the facility(ies) into the standby trust fund as directed by the FDEP Secretary, or designee.

The liability of the Surety(ies) shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety(ies) hereunder exceed the amount of said penal sum.

The Surety(ies) may cancel the bond by sending notice of cancellation by certified mail to the Principal and to the Secretary of the FDEP, or designee; however, cancellation shall not occur during the 120 days beginning on the date of receipt of the notice of cancellation by both the Principal and the FDEP Secretary, or designee, as evidenced by the return receipts.

The Principal may terminate this bond by sending written notice to the Surety(ies); provided, however, that no such notice shall become effective until the Surety(ies) receive(s) written authorization for termination of the bond by the Secretary of the FDEP, or designee.

Principal and Surety(ies) hereby agree to adjust the penal sum of the bond yearly so that it guarantees a new "Required Action" amount, provided that the penal sum does not increase by more than 20 percent in any one year, and no decrease in the penal sum takes place without the written permission of the FDEP Secretary, or designee.

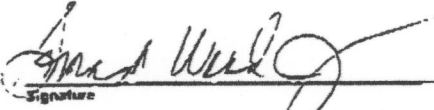
IN WITNESS WHEREOF, the Principal and Surety(ies) have executed this Financial Guarantee Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and Surety(ies), and that the wording of this surety bond is identical to the wording as adopted and incorporated by reference in Rule 62-701.900, F.A.C.

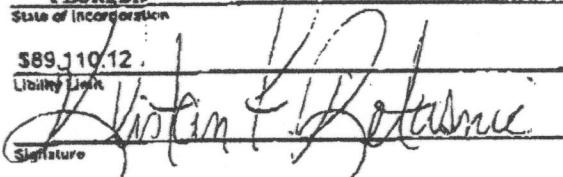
PRINCIPAL

CORPORATE SURETY(IES)

For each co-surety provide the following


Signature
Frank Ward Jr. U-P
Type Name and Title
312-942-0042
Telephone Number

CAROLINA CASUALTY INSURANCE COMPANY
Name and Address
2850 W. GOLF ROAD; ROLLING MEADOWS, IL

FLORIDA
State of Incorporation
589,110,12
Liability Limit

Signature
KRISTAN F. RETUSNIC, ATTORNEY-IN-FACT
Type Name and Title
708-845-3312
Telephone Number

Corporate Seal

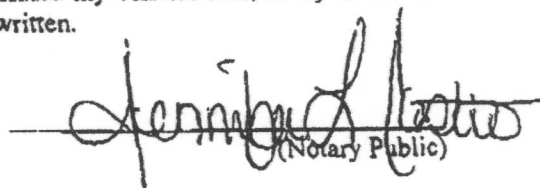
Corporate Seal

State of Illinois
County of Cook

On this 11TH day of NOVEMBER 20 04, before me personally appeared
KRISTAN F. RETUSNIC, known to me to be the Attorney-in-fact of
CAROLINA CASUALTY INSURANCE COMPANY, the corporation that executed the
within instrument, and acknowledged to me that such corporation executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal, at my office in the
aforesaid county, the day and year in this certificate first above written.

"OFFICIAL SEAL"
JENNIFER L. CASTRO
Notary Public, State of Illinois
My Commission Expires 03/01/2008


(Notary Public)

**POWER OF ATTORNEY
CAROLINA CASUALTY INSURANCE COMPANY
JACKSONVILLE, FLORIDA**

No. 177

KNOW ALL MEN BY THESE PRESENTS: that CAROLINA CASUALTY INSURANCE COMPANY ("Company") a corporation duly organized and existing under the laws of the State of Florida, having its principal office in Jacksonville, Florida, has made, constituted and appointed, and does by these presents make, constitute and appoint: John J. Naso, Jr. or Frank Q. Poppie or Kristan F. Reusnic or Illa J. Delman of Horton Insurance Agency, Inc. of Orland Park, IL

its true and lawful Agent and Attorney-in-Fact, with the power and authority hereby conferred in its name, place and stead, to execute, seal, acknowledge and deliver: any and all bonds and undertakings providing that no single obligation shall exceed Fifteen Million and 00/100 Dollars (\$15,000,000.00)

and to bind the Company thereby as fully and to the same extent as if such bonds had been duly executed and acknowledged by the regularly elected officers of the Company at its principal office in their own proper persons.

This Power of Attorney is granted pursuant to the Minutes of the Special Meeting of the Board of Directors of Carolina Casualty Insurance Company held on March 30, 1966, to wit:

RESOLVED: "That the following Officers of the Carolina Casualty Insurance Company, Chairman of the Board, President, Secretary and Treasurer, or either of them, are hereby authorized to execute on behalf of Carolina Casualty Insurance Company, Powers of Attorney authorizing and qualifying the Attorney-in-Fact named therein to execute bonds on behalf of the Carolina Casualty Insurance Company, and further, that the said Officers of the Company mentioned, are hereby authorized to affix the corporate seal of the said Company to Powers of Attorney executed pursuant hereto".

RESOLVED FURTHER, this Power of Attorney limits the acts of those named therein to the bonds and undertakings specifically named therein, and they have no authority to bind the company except in the manner and to the extent therein stated.

RESOLVED FURTHER, this Power of Attorney revokes all previous powers issued in behalf of the Attorney-in-Fact named above.

RESOLVED FURTHER, that the signature of any authorized officer and the seal of the Company may be affixed by facsimile to any power of attorney or certification thereof authorizing the execution and delivery of any bond, undertaking, recognizance, or other suretyship obligations of the Company; and such signature and seal when so used shall have the same force and effect as though manually affixed. The Company may continue to use for the purposes herein stated the facsimile signature of any person or persons who shall have been such officer or officers of the Company, notwithstanding the fact that they may have ceased to be such at the time when such instruments shall be issued.

IN WITNESS WHEREOF the Carolina Casualty Insurance Company has caused these presents to be signed and attested by its appropriate officers and its corporate seal herunto affixed this 17th day of March, 2004.



Attest:

By:

Betty C. Sutherland
Betty C. Sutherland
Vice President and Secretary

Carolina Casualty Insurance Company

By:

Armin W. Blumberg
Armin W. Blumberg
President and Chief Executive Officer

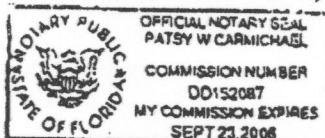
WARNING: THIS POWER OF ATTORNEY INVALID IF NOT PRINTED ON GREEN "MONITOR" SECURITY PAPER.
STATE OF FLORIDA)

SS

COUNTY OF DUVAL)

On this 17th day of March, 2004, before me personally came Betty C. Sutherland to me known, who, being by me duly sworn, did depose and say: that she is Secretary of Carolina Casualty Insurance Company, the Corporation described in and which executed the above instrument; and that she knows the seal of said Corporation; that the seal affixed to the said instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said Corporation and that she signed his/her name thereto by like order.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal; the day and year herein first above written.



Patsy W. Carmichael
Notary Public, State of Florida at Large

CERTIFICATE

I, the undersigned, Secretary of CAROLINA CASUALTY INSURANCE COMPANY, DO HEREBY CERTIFY that the foregoing is a just, true, correct and complete copy of original Power of Attorney; that the said Power of Attorney has not been revoked or rescinded and that the authority of the Attorney-in-Fact set forth therein, who executed the bond to which this Power of Attorney is attached, is in full force and effect as of this date.

Given under my hand and the seal of the Company, this 11TH day of NOVEMBER, 2004



Betty C. Sutherland
Betty C. Sutherland, Secretary

November 15, 2004

RECEIVED
NOV 15 2004
Central Dist. - DEP

Mr. Dave Seamans
Building Division
Orange County Growth Management Department
201 South Rosalind Avenue, First Floor
Orlando, Florida 32801

Subject: **Taft Recycling, Inc. Waste Processing Facility**
375 7th Street, Taft, Florida
Project No. 04-297.001

Dear Mr. Seamans:

On behalf of Taft Recycling, Inc. (Taft), HSA Golden is notifying Orange County of the filing with the Florida Department of Environmental Protection a permit modification application for expansion of the subject waste processing facility. This notification is required pursuant to Florida Statute Chapter 403.707(14). Taft plans to schedule a pre-application meeting with your Division within the next few weeks.

Sincerely,

HSA GOLDEN



James E. Golden, P.G.
Vice President, Principal Hydrogeologist

Copy to: Mr. Mike Massaro, Taft Recycling, Inc.
Mr. James Bradner, P.E., FDEP ✓

Cheryan, George

From: Bradner, James
Sent: Monday, November 08, 2004 8:21 AM
To: Cheryan, George
Subject: FW: Taft Recycling MRF

Let's discuss the response to this question sometime today.

-----Original Message-----

From: Jim Golden [mailto:jgolden@hsagolden.com]
Sent: Friday, November 05, 2004 3:06 PM
To: Bradner, James
Subject: Taft Recycling MRF

Jim,

You may remember, about 2 weeks ago, we discussed that we may request to temporarily accept class I waste into the existing MRF building until we could construct the add on. Instead, we decided to go forward with the mod. as it was and to later request this temporary setup. If we request this temporarily operation for class I after the mod. is complete, what will be the general process for review and timing? I know that the existing bldg, would need upgrades to it's leachate containment system, ventilation, lighting, and probably a minor ops plan revision, etc. Please advise, thx, Jim

James E. Golden, P.G.
 Vice President, Principal Hydrogeologist

HSA Golden
 225 East Robinson Street, Suite 100
 Orlando, FL 32801
 Telephone: 407 649-5475
 Direct Tel: 407 649-6458
 Fax: 407 649-6582
jgolden@hsagolden.com

11/10/2004 1:25pm VM to J. Golden re permit mod. Suggested that applicant wait for permit processing, and final agency action to be completed before receiving Class I waste

11/12/2004 Call back from J. Golden. Request interim operation on Class I with possible permit note! Discuss with FTL.

11/8/2004



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen Castille
Secretary

By E-Mail
bcondron@recyclingit.com

Mr. Bill Condron
Taft Recycling, Inc.
148 Baywood Avenue
Longwood, FL 32750

OCD-SW-04-0333

Orange County - SW
Taft Recycling, Inc., TS/MRF-WPF
Modification of SO48-0173968-002
Permit Application No. SO48-0173968-004

Dear Mr. Condron:

The additional information received on October 4 and Oct 22, 2004, was reviewed, however, the items on the attached sheet remain incomplete. Evaluation of your application will continue to be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within **30 days** of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

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

Sincerely,

James N. Bradner, P.E.
Program Manager
Solid and Hazardous Waste

Date: 10/26/2004

JNB/gc/ew
Enclosure

cc: David L. Leggett, P.E. - HSA Golden dleggett@hsagolden.com
James E. Golden, P.G. - HSA Golden jgolden@hsagolden.com

"More Protection, Less Process"

Printed on recycled paper.

1. Submit proof to the Department that the local government was notified prior to completion of application and not prior to permit issuance.
2. A financial mechanism must be funded in the amount specified in the approved cost estimate and accepted by the Department's Financial Coordinator before this application can be deemed complete. Financial responsibility arrangements for the facility for the approved amounts are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and **a copy of the approval letter submitted to:** Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.



225 East Robinson Street, Suite 100
Orlando, Florida 32801
Phone: 407 649-5475
Fax: 407 649-6582
Web: www.hsagolden.com

FACSIMILE COVER SHEET

Date: October 22, 2004

From: Jim Golden, P.G. 

To: Jim Bradner, George Cheryan, FDEP

Fax No.: 407-893-3124

Subject: Taft Recycling, Inc.
Permit Modification-Draft RAI Comments
No. SO48-0173968-004

No. of Pages to Follow: 3

Jim:

Thank you for discussing with me the draft comments for the subject application on Wednesday, October 20, 2004. I have attached additional information, corrections and clarifications to address the following comments we discussed.

Comment 1: Proof of Orange County notification will be forth coming.

✓ Comment 5: Form # 62-701.900(4), page 2 of 4 has been revised to provide the "average", and not the maximum, expected waste tons per day of Class I (300 tpd) and Class III (700 tpd).

✓ Comment 10: My leachate generation estimate has been corrected to 0.05 gallons of wash water per square foot, see attached.

✓ Comment 14: The aerial photo referred to was previously submitted (8/17/04 - Application) as Attachment D, Figure 1.

✓ Comment ¹⁵17: A revised Appendix B - Material Disposition table with 200 cyds of yard trash is attached.

Comment 18: If the closure cost estimate is approved, we will immediately begin the process of financial assurance instrument amount revision.

We trust that this information will more completely address your comments. Thank you again for your cooperation in this matter.

Environmental and Engineering Consultants

8. Applicant name (operating authority): Taft Recycling, Inc.
Mailing address: 1099 Miller Drive Altamonte Springs, Florida 32701
Street or P.O. Box City State Zip
Contact person: Bill Condron Telephone: (407) 851-0074
Title: Regional Manager bcondron@recyclingit.com
E-Mail address (if available)
9. Authorized agent/Consultant: HSA Golden
Mailing address: 225 E. Robinson Street, Suite 100 Orlando Florida 32801
Street or P.O. Box City State Zip
Contact person: James E. Golden Telephone: (407) 649-6458
Title: Vice President jgolden@hsagolden.com
E-Mail address (if available)
10. Landowner (if different than applicant): 7th Street Properties, LLC
Mailing address: 2401 S. Laflin Street Chicago Illinois 60608
Street or P.O. Box City State Zip
Contact person: Jeff Godfrey, Comptroller Telephone: (312) 942-0042
jgodfrey@recyclingit.com
E-Mail address (if available)
11. Cities, towns and areas to be served: _____
Orange, Osceola, Seminole Counties; City of Orlando
12. Date site will be ready to be inspected for completion: July 2005
13. Estimated costs:
Total Construction: \$ 1,000,000 Closing Costs: \$ TBD
14. Anticipated construction starting and completion dates:
From: January 2005 To: July 2005
15. Expected volume of waste to be received: 3,000 yds³/day Class I-300 / Class III-700 tons/day
16. Provide a brief description of the operations planned for this facility: The
facility will accept Class I and Class III waste from private collection vehicles. The Class I waste will be placed
into transport vehicles and hauled to a Department permitted Class I landfill. Recyclable materials will be separated
from the Class III waste stream. The remaining waste will be hauled to a Department permitted Class III landfill.

**MATERIALS DISPOSITION
TAFT RECYCLING, INC.
TAFT, FLORIDA**

Material Type	Maximum Storage Quantity	Density (lbs/CY)	Covered or Uncovered	Method of Storage	Disposal/Recycling Location	Maximum Hold Time
Unprocessed Class III	700 CY	400	Covered	Tipping Floor	Class III Landfill	1 Week
Unprocessed C&D	700 CY	667	Covered	Tipping Floor	C&D Landfill	1 Week
Yard Trash	200 CY	296	Uncovered	Outside Bin	Re-Sale Public	6 Months
Recovered Concrete	200 CY	4,000	Uncovered	Outside Bin	Re-Sale Public	6 Months
Asphalt Concrete	200 CY	1,380	Uncovered	Outside Bin	Re-Sale Public	6 Months
Roofing Tiles	200 CY	2,000	Uncovered	Outside Bin	Re-Sale Public	6 Months
Recovered Cardboard	60 CY	100	Uncovered	Outside Bin	Re-Sale Public	6 Months
Paper	60 CY	600	Covered	Outside Bin	Re-Sale Public	6 Months
Metal Ferrous	60 CY	400	Uncovered	Outside Bin	Re-Sale Public	6 Months
Metal Aluminum	60 CY	250	Uncovered	Outside Bin	Re-Sale Public	6 Months
Glass	60 CY	1,000	Uncovered	Outside Bin	Re-Sale Public	6 Months
Plastic	60 CY	75	Uncovered	Outside Bin	Re-Sale Public	6 Months
Recovered Wood	1,000 CY	600	Uncovered	Outside Bin	Re-Sale Public	6 Months
Tires	30 CY	100	Covered	Roll-off	Tire Recycler	30 Days
Class I Putrescible	1,200 CY	500	Covered	Trailers or Tipping Floor	Class I Landfill	48 Hours
Waste Oil/Hazardous Waste-Rejected	55 Gallons	8 lbs/gal	Covered	Inside Building	Safety Kleen	30 Days
RSM	100 CY	1,000	Covered	Covered Bin	Class I Landfill	6 Months

Note: Storage Location of Material is shown on the Site Plan.

102204

TAFT RECYCLING, INC.
LEACHATE GENERATION ESTIMATE

ASSUMPTIONS: 1) CLASS I TRIPPING AREA = 45' X 60'
DAILY WASH AREA = 2700 SF
WATER WASH = 0.05 GALLONS / SF. X 2700 SF. =
135 GAL / DAY
 $\therefore 135 \text{ GAL / DAY} \times 30 \text{ DAYS / MONTH} = \underline{4050 \text{ GAL / MONTH}}$

CLASS II AREA - SWEEP - NO WATER USE.

ABOVEGROUND LEACHATE STORAGE TANK = 5000 GAL.
CAPACITY
 \therefore STORAGE SYSTEM HAS 1.2 MONTH CAPACITY

J. B. Barts 9/22/04





PROJECT NO.: 04-297.001
DATE: 9/22/04
BY: JEB.
CALCULATION SHEET
APPENDIX H
SHEET 1 OF 1

Florida Department Of
Memorandum

Environmental Protection

CENTRAL DISTRICT

TO: George Cheryan 
THROUGH: Jim Bradner, P.E.
FROM: Deborah Helle, P.G. 
DATE: October 14, 2004
SUBJECT: Taft Recycling RAI Response Review

I have reviewed the referenced document and following are my comments:

The recommendations of the geotechnical engineering report must be followed to ensure the stability of any structure built on the site.



FILE COPY
225 East Robinson Street, Suite 100
Orlando, Florida 32801
Phone: 407 649-5475
Fax: 407 649-6582
Web: www.hsagolden.com

September 30, 2004

Via Hand Delivery

Mr. James N. Bradner, P.E.
Program Manager, Solid & Hazardous Waste
Department of Environmental Protection
3319 Maguire Blvd, Suite 232
Orlando, Florida 32803-3767

RECEIVED

OCT 04 2004
Central Dist. - DEP

Subject: **Taft Recycling, Inc., TS/MRF-WPF**
Modification of SO48-0173968-002
Permit Application No. SO48-0173968-004
Project No. 04-297.001

Dear Mr. Bradner:

On behalf of Taft Recycling, Inc. (Taft), HSA Golden is responding to your comment letter on the subject Waste Processing Facility (WPF) permit modification application dated September 16, 2004. Hereafter, we restate your comments and respond accordingly.

Comment 1: The applicant is required to notify the local government having jurisdiction over the facility of the filing of the permit application before or on the same day of filing the application with the Department. Submit proof to the Department that the local government was notified.

Response: Taft will supply the Department proof of local governmental authority notification prior to permit issuance.

Comment 2: For Item B-1 on Page 3 of 4, DEP Form #62-701.900(4), submit a projection of the waste types and quantities expected in future years, and the assumptions used to make the projections, Rule 62-701.710(2)(a), FAC. The reference to Attachment C, Sections 1.1 and 1.2 in the Permit Modification Application, does not adequately address Item B-1.

Response: Section 1.2.1 Waste Projections of the Operations Plan has been revised to include waste types and quantities in future years, and the assumptions used to make the projections, see attached.

Comment 3: The site plan in Attachment D of the Permit Modification Application does not show relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site, and wells serving

Environmental and Engineering Consultants

community public water supplies on or within 1,000 feet of the site, as required in Item B-2 on Page 3 of 4, DEP Form #62-701.900(4). Comment and make any necessary revisions to the site plan.

Response:

The information required under form no. 62-701.900(4) was provided in the original 2000 submittal and has not changed. However, we have added the relevant features requested on the revised Site Plan, Appendix I, drawing C-1. In addition, a wetlands map is attached, Figure 1. There are no water bodies, wells or wetlands on site. The site was a borrow pit in the 1970s and was reclaimed in the 1980s. Boggy Creek is adjacent to the site to the west.

Comment 4:

Provide information to indicate that the construction and operation of the proposed Transfer Station is not in violation of the prohibitions referenced in Rule 62-701.300, F.A.C.

Response:

The information required by rule 62-701.300, Prohibitions was provided in the original permit submittal, see attached. Compliance with these prohibitions has not changed; however, we have provided an update on compliance with 62-701.300. The proposed WPF construction and operation will not violate the FAC 62-701.300 Prohibitions as stated below:

- (1) (a) No solid waste will be stored at the proposed WPF prior to permitting.
(b) No solid waste will be stored, process, or disposed of in the manner or location that will cause air quality, water quality, or receiving water standards to be violated, as described in the application.
- (2) Siting (since all solid wastes are to be stored in the WPF building, per 62-701.300(14) the following prohibitions do not apply).
 - (a) The area proposed for storage of solid waste is not in an area of unstable geological formations (sinkholes) or soils, see Department files, Attachment A (Engineering Report, HAI, 2000) and Attachment F (Geotechnical Report) of the permit application.
 - (b) A door-to-door well survey was performed to locate existing water supply wells within 500 feet of the proposed facility. The well survey indicated that all the properties within 500 feet of the site are commercial properties and receive water from OUC. No wells were located within the search area.
 - (c) The Facility will not store waste in a dewatered pit.
 - (d) As shown on the FEMA map (Figure 2) in the Engineering Report, the western half of the property is located within the 100 year flood zone. However, the property has been built up to an elevation of approximately 98 feet NGVD from the 100 year flood elevation of approximately 94 feet NGVD indicated on the USGS topographic map. Also, a stormwater system has been developed for the site to collect and control surface water runoff. Therefore, we do not anticipate any flooding problems on the subject site.
 - (e) The Facility will not store wastes in surface water or groundwater.

- (f) No solid waste will be stored within 200 feet of the closest water body (Boggy Creek). The National Wetland Inventory shows a wetland on the property which extends onto the property to the east. As explained in Section 2.4 of the Engineering Report (Hartman, 2000), this wetland (borrow pit) was filled by the previous owner to surrounding grade with clean debris and partially covered with concrete in the early 1980s.
- (g) The Facility will not store wastes in any road right-of-way.
- (h) The South Florida Water Management District (SFWMD) was contacted to request a survey of all the permitted water supply wells within 1000 feet of the proposed facility. The well inventory indicated that the proposed WPF is not within 1000 feet of a community potable well.
- (3) No burning is proposed at the WPF.
- (4) Hazardous wastes are unacceptable wastes at the proposed WPF, see application.
- (5) PCBs wastes are unacceptable wastes at the proposed WPF, see application.
- (6) Biomedical wastes are unacceptable wastes at the proposed WPF, see application.
- (7) Class I surface waters. N/A
- (8) Special wastes for landfills. N/A
- (9) Special wastes for waste-to-energy facilities. N/A
- (10) Liquids restrictions. N/A
- (11) Except as provided in paragraph (b) of this subsection no person may mix or commingle used oil with solid waste that is to be disposed of in landfills or directly dispose of used oil in landfills. N/A
- (12) Yard trash. The prohibitions in paragraphs (2)(b), (f) and (h) of this section apply to the storage processing, or disposal of yard trash, except that the following setback distances shall apply:
 - (a) The WPF is not within 100 feet from off-site potable water wells, no setback required from on-site water wells;
 - (b) 50 feet from water bodies; a 50-foot setback yard waste area will be maintained; and
 - (c) The WPF is not within 200 feet from wells serving community water supplies.
- (13) Tanks. The prohibitions in subsection (2) of this section do not apply to the storage or treatment of solid waste in tanks which meet the criteria of Chapter 62-761 or Rule 62-701.400(6), F.A.C. Instead, no such storage tank shall be installed within 500 feet of any existing community water supply system or any existing non-transient non-community water supply system, nor shall any tank be installed within 100 feet of any other existing potable water supply well. Taft's proposed WPF leachate tank is double-contained per Rules 62-761 and 62-701.400(6)(c).
- (14) Indoor storage. The prohibitions in subsection (2) of this section do not apply to the storage or processing of solid waste indoors, provided that the indoor storage area has an impervious surface and a leachate collection system. For the purposes of this subsection, an impervious

surface means either a poured concrete pad having a minimum thickness of four inches, or an asphalt concrete paving with both a minimum thickness of one and one-half inches and with an additional component to restrict leaching to ground water such as a soil cement subbase, an epoxy seal or a geomembrane. The Taft WPF building floor exceeds these criteria.

- (15) Storage in vehicles. The prohibitions in subsection (2) of this section do not apply to the storage of solid waste in an enclosed or covered vehicle, provided that such vehicle has either been unloaded or moved over public highways within the previous seven days. Acknowledged.
- (16) Existing facilities. Those portions of facilities which were constructed prior to May 27, 2001, remain subject to the prohibitions that were in effect at the time the permit authorizing construction was issued. Lateral expansions of such facilities remain subject to the prohibitions that were in effect at the time the permit authorizing the lateral expansion was issued. Acknowledged.

Comment 5: For Item A-15, DEP Form #62-701.900(4), provide average tons/day of Class I waste and average tons/day of Class III waste that will be received by the facility.

Response: Of the total average tonnage of 1500 tons/day to be received, 500 tons/day will be Class I and 1000 tons/day will be Class III.

Comment 6: Will the Transfer Station handling Class I waste manage waste on a first-in, first-out basis, Rule 62-701.710(10)(a), FAC.?

Response: Yes.

Comment 7: It is not clear, either as described in Attachment C, Page 7, Section 1.9, of the Permit Modification Application, or depicted on Sheet C-1 of the construction drawings, how truck traffic will enter, load/unload and leave the site. Provide a detailed description of the traffic pattern and add any necessary details to the proposed site plan drawing. The location of the entrance gate described in Section 1.9 does not appear to be consistent with the entrance depicted on Sheet C-1. Also, the word "corner" is consistently misspelled in the Section 1.9 narrative. Make any necessary corrections and submit the revised narrative and drawing.

Response: Truck traffic patterns and loading/unloading areas have been depicted on Appendix I, drawing D-2. A detailed description of truck traffic flow has been added to revised Operations Plan, Section 1.9, along with an entrance description. Other text and drawing revisions as requested are attached.

Comment 8: Describe how loading and unloading of solid waste will occur, and how Class I and Class III waste will be kept segregated during loading, unloading, and

temporary storage. Make any necessary revisions to the operation plan and construction drawings. Note that mixed reject waste must be classified according to the highest category of waste; e.g., if Class I and Class III wastes are mixed, the entire volume of mixed waste becomes Class I waste.

Response: Operations Plan Section 2.3 has been revised to define the segregated C&D, Class III and Class I areas of the WPF Building. These areas are also shown on revised site plan, drawing D-2. We understand that mixed reject waste must be classified and disposed of as the highest category of waste.

Comment 9: What is the purpose of the 2-inch diameter, Schedule 40 PVC pipe depicted at elevation 94.25± on the Stormwater Sump Detail, Sheet D-1 of the construction drawings? If this is proposed as an emergency overflow in case of lift pump failure, will an elevation difference of 0.25 foot between the sump and the stormwater pond allow sufficient conveyance to prevent flooding? Comment and provide any necessary design revisions.

Response: This two inch pvc pipe is to drain loading ramp stormwater to the stormwater pond north of the building. This ramp portion will not contact solid wastes or leachate. A check valve is in the pipe to prevent flooding. If sump stormwater rises above the 94.25 ± ft., the sump pump will pump stormwater into the pond.

Comment 10: Provide estimates of the rate and volume of leachate generation from transfer operations. Where will the leachate be disposed, and how will it be transported or conveyed to the disposal site?

Response: Our leachate generation volume estimate for the transfer/WPF building is attached as Appendix H. Leachate will be stored in the 5,000 gallon above ground tank and transported to a State permitted industrial wastewater treatment plant, such as IWS, Jacksonville, FL. Transportation will be by a permitted industrial waste hauler in a 4,000 gallon vacuum tanker.

Comment 11: Will leachate collected in both Class I and Class III tipping areas will be conveyed to the leachate containment reservoir through force mains? How will leachate be managed in the event of a power failure? Comment, and make any necessary revisions to the operation plan.

Response: Yes, leachate will be pumped to the storage tank. In the event of a power failure, the two on site 8,000 kw generators will be used to power the system and the building. Operations Plan Section 1.6.7 has been revised accordingly, see attached.

Comment 12: Rule 62-701.710(3)(a), F.A.C. requires a ventilation system for tipping, storage, processing, and compaction areas in an enclosed building or covered area. How

will this requirement be met? Comment and provide any necessary design revisions.

Response: The ventilation system details for the WPF building are supplied in Operations Plan, Appendix H, see attached. Specifically, five, Greenheck, 3-hp., 30,000 cfm exhaust fans are to be installed in the north wall of the proposed class I WPF building.

Comment 13: Provide a schedule for training of individual employees, including the employee's name and title, the date when training is due and what class the employee will attend to meet the requirements of Rule 62-701.320(15)(a), F.A.C., as referenced in 62-701.710(4)(c), F.A.C. Incorporate this schedule in the operation plan.

Response: A schedule of training for each employee, has been incorporated in to the Operations Plan, Appendix D, see attached.

Comment 14: Page 8, Section 1.14, Attachment C - Operations Plan, in the Permit Modification Application, indicates the facility will be open 24 hours per day, 7 days a week. How will noise from trucks, facility operation, etc. be controlled and prevented from being a nuisance to the surrounding community?

Response: The surrounding community is industrial land uses and the truck and facility noise is not expected to be a nuisance, see aerial photo, Attachment D. However, all waste processing will be during daytime hours and all night time operations will be limited to within the WPF building. Only 10 percent of truck traffic is after 6:00 p.m. and all trucks are FDOT noise suppression approved (muffled).

Comment 15: Page 12, Section 3.0, Attachment C - Operations Plan in the Permit Modification Application, refers to the copy of an insurance policy for the closure amount in Attachment D, which the Department has not received. If this is an error, provide the appropriate text revision.

Response: The insurance policy referred to in the Operations Plan will be provided to the Department upon approval of a final financial assurance amount.

Comment 16: The updated Geotechnical Report referred in Attachment F of the Permit Modification Application, has not been received by the Department. Submit the updated Geotechnical Report.

Response: The updated Geotechnical Report, Attachment F, is enclosed for your review.

Comment 17: Appendix B - Material Disposition in Attachment C - Operations Plan in the Permit Modification Application, shows maximum storage capacity for yard trash to be 1,000 cubic yards. The Financial Assurance - Attachment E in the Permit Modification Application, shows closure cost for 200 cubic yards of yard trash.

Explain this discrepancy and, if necessary, submit a revised closure cost estimate for the facility, signed and sealed by a professional engineer, licensed in Florida.

Response: Appendix B - Material Disposition has been revised to 200 cubic yards of yard trash; therefore, the closure cost estimate is correct.

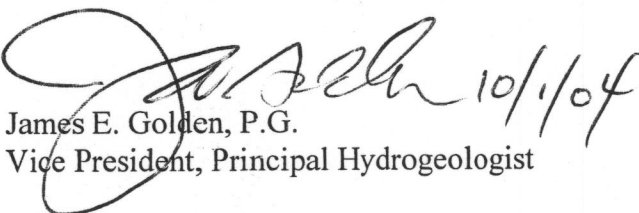
Comment 18: A financial mechanism must be funded in the amount specified in the approved cost estimate and accepted by the Department's Financial Coordinator before this application can be deemed complete. Financial responsibility arrangements for the facility for the approved amounts are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and a copy of the approval letter submitted to: Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.

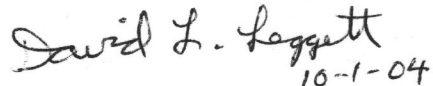
Response: Once we have received Department approval of the Financial assurance cost estimate, an insurance policy for that amount will be provided to the Financial coordinator in Tallahassee and a copy to the Central District.

We trust that our response will allow approval of the subject permit modification. Please call if you have any questions.

Sincerely,

HSA GOLDEN

 10/1/04
James E. Golden, P.G.
Vice President, Principal Hydrogeologist

 10-1-04
David L. Leggett, P.E.
Principal Engineer, Project Manager

Enclosures

Copy to: Addressee (3)
Mr. Bill Condrón
Mr. Mike Massaro



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen Castille
Secretary

By-E-Mail
bcondron@recyclingit.com

Mr. Bill Condron
Taft Recycling, Inc.
148 Baywood Avenue
Longwood, FL 32751

OCD-SW-04-0304

Orange County - SW
Taft Recycling, Inc., TS/MRF-WPF
Modification of SO48-0173968-002
Permit Application No. SO48-0173968-004

Dear Mr. Condron:

Your application for permit received on August 19, 2004 is incomplete. Please provide the information listed on the attached sheet promptly. Evaluation of your application will be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

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

Sincerely,

James N. Bradner, P.E.
Program Manager
Solid and Hazardous Waste

Date: September 16, 2004

JNB/gc/ew
Enclosure

cc: David L. Leggett, P.E. - HSA Golden dleggett@hsagolden.com
James E. Golden, P.G. - HSA Golden jgolden@hsagolden.com

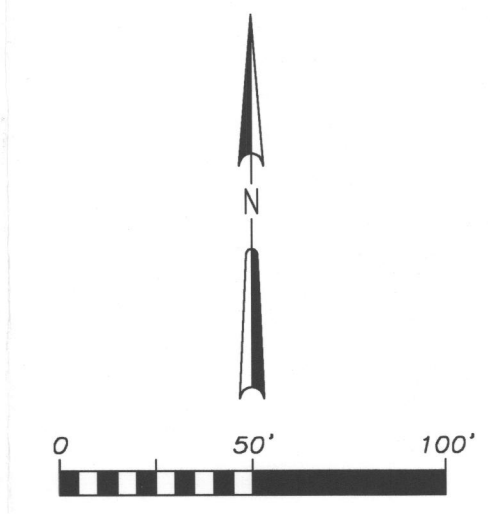
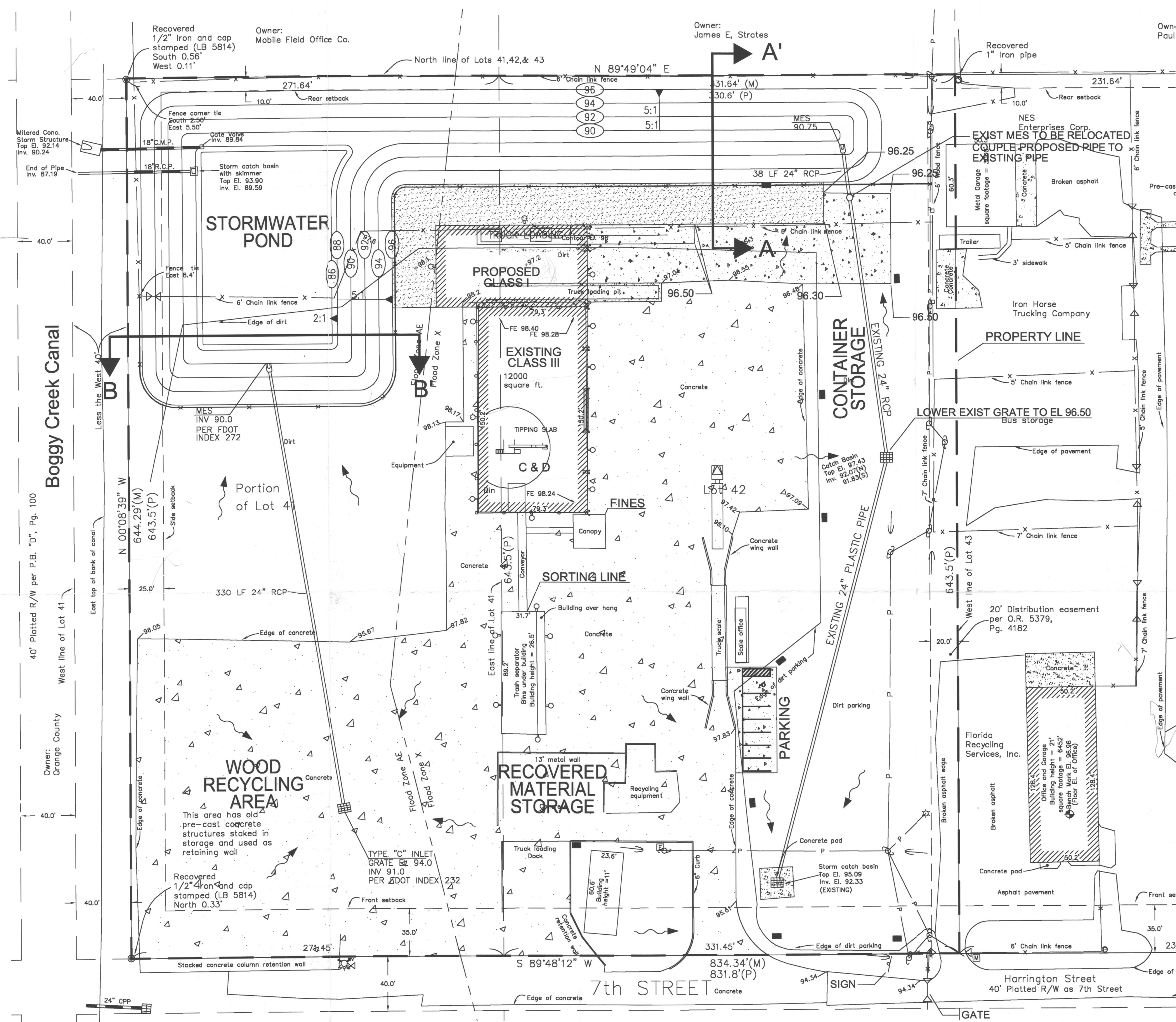
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1. The applicant is required to notify the local government having jurisdiction over the facility of the filing of the permit application before or on the same day of filing the application with the Department. Submit proof to the Department that the local government was notified.
2. For Item B-1 on Page 3 of 4, DEP Form # 62-701.900(4), submit a projection of the waste types and quantities expected in future years, and the assumptions used to make the projections, Rule 62-701.710(2)(a), F.A.C. The reference to Attachment C, Sections 1.1 and 1.2 in the Permit Modification Application, does not adequately address Item B-1.
3. The site plan in Attachment D of the Permit Modification Application does not show relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site, and wells serving community public water supplies on or within 1,000 feet of the site, as required in Item B-2 on Page 3 of 4, DEP Form # 62-701.900(4). Comment and make any necessary revisions to the site plan.
4. Provide information to indicate that the construction and operation of the proposed Transfer Station is not in violation of the prohibitions referenced in Rule 62-701.300, F.A.C.
5. For Item A-15, DEP Form # 62-701.900(4), provide average tons/day of Class I waste and average tons/day of Class III waste that will be received by the facility.
6. Will the Transfer Station handling Class I waste manage waste on a first-in, first-out basis, Rule 62-701.710(10) (a), F.A.C.?
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11. Will leachate collected in both Class I and Class III tipping areas will be conveyed to the leachate containment reservoir through force mains? How will leachate be managed in the event of a power failure? Comment, and make any necessary revisions to the operation plan.
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13. Provide a schedule for training of individual employees, including the employee's name and title, the date when training is due and what class the employee will attend to meet the requirements of

Rule 62-701.320(15) (a), F.A.C., as referenced in 62-701.710(4)(c), F.A.C. Incorporate this schedule in the operation plan.

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18. A financial mechanism must be funded in the amount specified in the approved cost estimate and accepted by the Department's Financial Coordinator before this application can be deemed complete. Financial responsibility arrangements for the facility for the approved amounts are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and **a copy of the approval letter submitted to:** Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.



- LEGEND**
- denotes sign
 - denotes mitered end section
 - denotes existing concrete area
 - denotes proposed concrete area
 - denotes proposed gravel area
 - denotes storm catch basin
 - 1000 W MH SHOEBOX OUTDOOR LIGHT @ 39 FT AG
 - 400 W METAL HALIDE LIGHT - BLDG MOUNT
 - PROPERTY LINE
 - STORM WATER FLOW DIRECTION

HSA Golden
 225 East Robinson Street
 Suite 100
 Orlando, Florida 32801
 Tel: 407 649-5475
 Fax: 407 649-6582

VERIFY SCALES
 BAR IS ONE INCH ON ORIGINAL DRAWING
 IF NOT ONE INCH ON THIS SHEET, PLEASE ADJUST SCALE.
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TAFT RECYCLING, INC.
 ORANGE COUNTY, FLORIDA

**CLASS I & III WPF
 PROPOSED SITE PLAN**

DATE	REVISIONS	REVISED	CHECKED	DATE	BY	DATE	PROJECT NO.
					David L. Leggett, P.E.	7/04	04-297.001
					DESIGNED	7/04	SCALE
					DRAWN	7/04	1"=50'
					CHECKED	8/04	C-1
					QC APPROVAL	8/04	
					FILE:	04297001C10.DWG	SHEET
							OF

RECEIVED
 OCT 04 2004
 Central Dist - DEP