



**Board of County Commissioners**  
**DEPARTMENT OF PUBLIC WORKS**  
**SOLID WASTE MANAGEMENT DIVISION**

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*Compliance/  
Inspection  
file*

*Environmental Protection*

*DATE*

*TIME*

April 25, 2008

Nancy Gaskin, Environmental Specialist  
Solid Waste Section  
Florida Department of Environmental Protection  
13051 N. Telecom Parkway  
Temple Terrace, FL 33637-0926

Re: Citrus County Central Landfill  
Permit No. 21375-008-SO/01 and 126602-002-WT/02  
Site Inspection 10/22/07 Additional Response

Dear Ms. Gaskin:

Upon further research into your comments from your 10/22/07 inspection of our site, we have found that the operations plan does allow for the activity of bulking. In your inspection you cite SC C.9.b. This condition directs you to SC A.2.b which incorporates the operations plan. Part of the operations plan is the "Facility Standards and Emergency Incidents Plan for the Citrus County Hazardous Waste Collection and Storage Facility". The aforementioned document allows for three (3) choices in how to handle material for facilities that have in-house staff. They are;

- 1 also bulk, neutralize or otherwise treat waste; or
2. also collect CESQG waste with in-house staff; or
3. both 1 and 2 above.

Choice three (3) applies to this facility. Also since your October inspection we have hired a full time Household Hazardous Waste Coordinator. This staff addition has greatly increased the effectiveness of the Household Hazardous Waste function at our site. Therefore we have reinstated these activities.

Yours truly,

Carmen Bruno.  
Customer Service Crew Leader

CB

CC: Susan J. Metcalfe, Director, Division of Solid Waste Management *SJM*  
Michael K. Arnold, Assistant Director, Public Works Department



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Michael K. Arnold, Assistant Director, Public Works Department

# STANDARDS FOR FLORIDA'S HHW COLLECTION FACILITIES

Permanent HHW programs should use the following recommendations as guidance:

## I. APPLICABILITY

These standards are proposed primarily for facilities which collect HHW with in-house staff and:

1. Also bulk, neutralize or otherwise treat waste, or:
2. Also collect CESQG waste with in-house staff, or:
3. Both 1 and 2 above

Subsets of these standards may be appropriate for other types of facilities.

## II. PHYSICAL FACILITY MINIMUM STANDARDS

### A. Containment

1. All waste should be stored either in buildings or in drums or in some other location which is sheltered and contained and will not pollute stormwater if a container leaks.
2. All liquid waste should be stored within secondary containment structures capable of containing the entire contents of the largest two (2) containers in storage or 10% of the total volume of liquid in storage, whichever is greater.
3. Containers holding liquids should be placed so that material escaping from a small leak in a non-pressurized container will not fall outside the containment structure.
4. All non-liquid waste should be stored within secondary containment structures capable of containing all stormwater reasonably expected to fall or run onto the structure in a 25 year flood or on a paved and sheltered surface which would be substantially unaffected by a 25 year flood.
5. Stormwater should be prevented from accumulating within in-service containment structures in amounts in excess of 10% of their volume.
6. Containers should be protected from deterioration due to excessive exposure to stormwater or condensation.

(Note: Some of the standards in this section are more restrictive than requirements applicable to RCRA facilities. We believe that they are appropriate because wastes received by HHW facilities are often received in containers in poor condition, and thus HHW facilities will experience more leaking containers than RCRA facilities. The same logic is applied in section V.E.)

### B. Required Equipment

All facilities should be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

1. An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;

2. A device, such as a cell phone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning emergency assistance from local police department, fire department, or State or local emergency response teams;
3. Fire control equipment, including portable fire extinguishers, (including special extinguishing equipment, such as those using foam, inert gas, or dry chemicals),
4. Spill control equipment, including appropriate protective clothing and equipment and decontamination equipment
5. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems for fire suppression and/or decontamination.
6. Emergency shower and eyewash

### **III. WASTE ACCEPTANCE CRITERIA**

#### **A. Household Waste**

Facilities should only accept waste if:

1. They have a disposal arrangement or contract for that specific material
2. They have sufficient funds to pay for its disposal
3. They can safely store it pending disposal

#### **B. CESQG Waste**

Facilities should meet the following additional criteria with respect to any CESQG waste that they accept (note that this section applies to wastes that the facility accepts, not to waste accepted directly by the disposal contractor):

1. They should verify that the source is Conditionally Exempt.
2. They should not accept unknowns from CESQG's. The generator should be required to identify the process generating the waste and all materials that were used in that process. From that information, either the generator or the facility manager should be able to determine which EPA waste codes are applicable to that waste.
3. They should only accept waste if they can verify that it is what the generator says it is. (note: A good way to do this is to find out what tests the permitted disposal facilities use to verify a material and do the same thing yourself)

### **IV. PERSONNEL**

#### **A. Training**

Facility personnel should successfully complete a training program that teaches them to perform their duties in a way that ensures the facility is operated in a manner that protects them and the public from potential health and safety hazards at the site and is protective of the environment.

1. The program should be taught by a person trained in hazardous waste management procedures, and should include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the

positions in which they are employed. The person providing the training should have no less than 40 hours training in appropriate aspects of hazardous waste/material management including selection of protective clothing and equipment and emergency response.

2. At a minimum, the training program should be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:
  - a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
  - b. Communications or alarm systems;
  - c. Response to fires or explosions;
  - d. Response to discharges to the land surface; incidents; and
  - e. Shutdown of operations.
3. All personnel who handle hazardous waste (or items which would be hazardous waste if regulated) should be trained in sorting materials by hazard class and compatibility group.
4. Facility personnel should successfully complete the program required above within six months after the date of their employment or assignment to a facility. New employees should not work in unsupervised positions until they have completed the training requirements.
5. Facility personnel should take part in an annual review of the initial training required.
6. Facilities which receive CESQG waste or bulk or otherwise treat any waste should have on staff, at least one person who has no less than 40 hours training in appropriate aspects of hazardous waste/material management including selection of protective clothing and equipment and emergency response. One such person should be on site whenever CESQG waste is being received and whenever any hazardous material waste is being bulked or otherwise treated.

## **B. Records**

The owner or operator should maintain the following documents and records at the facility or at the facility manager's office:

1. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
2. A written job description for each position. This description may be consistent in its degree of specificity with descriptions for other similar positions at the same site, but should include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and
4. Record that documents that the training or job experience required for each position has been completed by facility personnel.

## **V. OPERATIONS**

### **A. Maintenance and Operation of Facility**

1. Facilities should be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water that could threaten human health or the environment.
2. All facility communications or alarm system, fire protection equipment, spill control equipment, and decontamination equipment, where required, should be tested and maintained in accordance with manufacturer's recommendations and as necessary to assure its proper operation in time of emergency.
3. The owner or operator should maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.
4. Whenever hazardous waste is being poured, mixed, or otherwise handled, all personnel involved in the operation should have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not necessary.
5. If there is ever just one employee on the premises while the facility is operation, he should have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, unless such a device is not necessary. Telephones and radios shall not be placed in areas where the atmosphere may become explosive due to the presence of flammable vapors, dusts, or gases.

## **B. Accumulation Time**

1. An operator of a permanent HHW collection site may accumulate hazardous waste on-site, provided that:
  - a. The waste is placed in containers (note: a container is a storage building or a DOT shippable drum) and the operator follows the recommendations of this document;
  - b. The amount of waste accumulated does not place the facility in violation of any part of section II.A, V.D, or V.E; and
  - c. While being accumulated on-site, each container is labeled with the appropriate DOT label, if any, and a description of the contents (e.g., used oil, paints, batteries). (note: this does not require labeling each original consumer container. A proper label on a drum or storage building door is sufficient provided it describes all the hazardous properties of the materials inside.)
2. It is recommended that HHW accumulated for treatment or disposal not be accumulated on site for more than 210 days. Once the capacity limit of a collection site or time limit is reached, all hazardous waste collected should be shipped to a permitted hazardous waste facility for treatment or disposal. The operator may request DEP approval of a longer accumulation time period for specific wastes which are accumulated slowly.

## **C. Management of Containers**

1. If a container holding hazardous waste is not in good condition or if it begins to leak, the operator should pack the container and its contents in a larger container that is in good

condition, or manage the waste in some other way that complies with the requirements of this part.

2. The operator should use containers made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.
3. A container holding hazardous waste should always be closed during storage, except when it is necessary to add or remove waste.
4. A container holding hazardous waste should not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.
5. The operator should inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The operator should keep records and results of inspections.

#### **D. Special Requirements for Ignitable or Reactive Waste**

1. Containers holding ignitable or reactive waste should be located at least 50 feet from the facility's property line.
2. The operator should take precautions to prevent accidental ignition of ignitable waste. This waste should be separated and protected from sources of ignition including but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable waste is being handled, the owner or operator should confine smoking and open flame to a specially designated location. "No Smoking" signs should be conspicuously placed wherever there is a hazard from ignitable waste.
3. Reactive wastes shall receive such special handling and storage as needed to prevent unintentional reactions.

#### **E. Special Requirements for Incompatible Wastes**

The purpose of this Section is to prevent fires, explosions, gaseous emissions, leaching, or other discharge of hazardous waste or hazardous waste constituents which could result from the mixing of incompatible waste or if a container breaks or leaks.

1. Incompatible waste, or incompatible waste and materials (for examples, see Attachment 2), should not be placed in the same container;
2. Hazardous waste should not be placed in an unwashed container that previously held an incompatible waste or material (for examples, see Attachment 2); and
3. Incompatible wastes should be stored separately. They should be separated by a minimum of two impervious barriers such that, should any one container fail, no waste or vapors will come into contact with incompatible material or containers.

#### **F. Handling Requirements for Ignitable, Reactive, or Incompatible Wastes**

Repackaging or treatment, including bulking, or neutralizing of ignitable, reactive, or incompatible waste, should be conducted so that it does not:

1. Generate extreme heat or pressure, fire or explosion, or violent reaction;

2. Produce uncontrolled toxic vapors, dusts, or gases in sufficient quantities to threaten human health;
3. Produce uncontrolled flammable vapors, dusts, or gases in sufficient quantities to pose a risk of fire or explosion;
4. Damage the structural integrity of the device or facility containing the waste; or
5. Threaten human health or the environment.

## **G. Material Redistribution Guidelines**

1. Selection of Materials for Redistribution to the Public
  - a. Materials selected for exchange programs should meet the following minimum criteria:
    - i. original containers only
    - ii. original label including ingredients, instructions for use, and warnings must be present and readable
    - iii. contents should be visually inspected and should look like correct material in new condition
    - iv. containers should be at least 3/4 full except pesticides, which should be full and, where applicable, sealed ( NOTE: Facilities which choose to include pesticides must maintain a current list of banned, canceled, and restricted use pesticides.)
  - b. The following items should be excluded from redistribution programs:
    - i. ammunition
    - ii. reactive materials
    - iii. canceled or banned products
  - c. Each item selected for redistribution should be approved by the facility manager or his/her designee.
2. Storage
  - a. Materials designated for redistribution should be stored in a separate area of the facility. This area should be clearly marked and secured from unauthorized access.
  - b. As a minimum, secondary containment sufficient to contain the entire contents of the largest two containers in storage should be provided. Secondary containment which also provides for the separation of incompatibles is preferred.
3. Customers
  - a. All customers should be at least 18 years of age
  - b. Customers should be allowed to "shop" only in the designated area.
4. Documentation
  - a. Each redistribution program should develop and use a waiver/inventory form which includes the following elements:
    - i. customer's name and signature
    - ii. name and quantity if each material received
    - iii. liability waiver ("hold harmless" statement)
  - b. The above document should be reviewed by the county attorney.



## **VI. PREPAREDNESS AND PREVENTION**

### **A. Arrangements with Local Authorities**

The operator should attempt to make the following arrangements, as appropriate for the type of waste handled at this facility and the potential need for the services of these organizations:

1. Arrangements to familiarize police, fire department, and emergency response teams with the layout of the facility, properties of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
2. Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any other to provide support to the primary emergency authority;
3. Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
4. Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.

## **VII. CONTINGENCY PLAN AND EMERGENCY PROCEDURES**

### **A. Purpose and Implementation of Contingency Plan**

1. Each owner or operator should have a contingency plan for his facility. The contingency plan should be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.
2. The provisions of the plan should be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

### **B. Content of Contingency Plan**

1. The contingency plan should describe the actions facility personnel should take to protect the public from potential health and safety hazards in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.
2. If the owner or operator has already prepared some other emergency or contingency plan in the normal permit application for the solid waste management facility, he/she need only amend that plan to incorporate hazardous waste management provisions that are applicable to the HHW collection site.
3. The plan should describe arrangements agreed to by local police department, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services as previously described.

4. The plan should list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (as described later). This list should be kept up to date. Where more than one person is listed, one should be named as primary emergency coordinator and others should be listed in the order in which they will assume responsibility as alternates.
5. The plan should include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems [internal and external], and decontamination equipment, where this equipment is required. This list should be kept up to date. In addition, the plan should include the location and a physical description of each item on the list, and a brief outline of its capabilities.
6. The plan should include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan should describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

### **C. Copies of Contingency Plan**

A copy of the contingency plan and all revisions to the plan should be maintained at the facility, submitted to the local police and fire departments, hospitals, and State and local emergency response teams that would be called upon to provide emergency services.

### **D. Changes of Contingency Plan**

The contingency plan should be reviewed, and immediately changed if necessary; whenever:

1. The plan fails in an emergency;
2. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
3. The list of emergency coordinators changes; or
4. The list of emergency equipment changes.

### **E. Emergency Coordinator**

At all times, there should be at least one employee either on the facility premises or on call (i.e. available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator should be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the locations and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person should have the authority to commit the resources needed to carry out the contingency plan. The emergency coordinator's responsibilities vary, depending on factors such as type and variety of waste(s) handled by the facility, and type and complexity of the facility. "Emergency procedures" outlines the activities for which the coordinator is responsible.

### **F. Emergency Procedures**

1. Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) should immediately:

- a. Activate internal facility alarms or communication systems, where applicable, to notify all facility alarms or communication systems.
  - b. Notify appropriate State or local agencies with designated response roles if their help is needed
2. Whenever there is a release, fire, or explosion, the emergency coordinator should immediately identify the character, exact source, amount, and areal extent of any released materials. He or she may do this by observation or review of facility records, or if necessary, by chemical analysis.
3. Concurrently, the emergency coordinator should assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment should consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire, or heat-induced explosions).
4. If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, they should report their findings as follows:
  - a. If their assessment indicates that evacuation of local areas may be advisable, they should immediately notify appropriate local authorities. The emergency coordinator should be available to help appropriate officials decide whether local areas should be evacuated; and
  - b. They should immediately notify either the government official designated as the on-scene coordinator for that area or the State Warning Point (using their 24-hour emergencies only numbers, 1-800-320-0519 or 1-850-413-9900). The report should include:
    - i. Name and telephone number of reporter;
    - ii. Name and address of facility;
    - iii. Time and type of incident (e.g., release, fire);
    - iv. Name and quantity of material(s) involved, to the extent known;
    - v. The extent of injuries, if any; and
    - vi. The possible hazards to human health, or the environment, outside the facility.
5. During an emergency, the emergency coordinator should take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other areas of the facility. These measures should include, where applicable, stopping processes and operations, collecting and containing release waste, and removing or isolating containers.
6. During an emergency, the emergency coordinator should monitor for leaks, pressure buildup, gas generation, or ruptures in containers and/or equipment, wherever this is appropriate.
7. Immediately after an emergency, the emergency coordinator should provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material contaminated by a release, fire, or explosion at the facility.
8. The emergency coordinator should ensure that, in the affected area(s) of the facility;
  - a. No waste that may be incompatible with the released material is stored or handled until cleanup procedures are complete; and
  - b. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

- c. The owner or operator should notify appropriate State and local authorities, in writing, that the facility is once again functional before operations are resume in the affected area(s) of the facility.
9. The owner or operator should note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 24 hours after the incident, incidents shall be reported to the Department of Environmental Protection (District Office Hazardous Waste Supervisor), and a written report on the incident should be submitted within 15 days. The report should include:
  - a. Name, address, and telephone number of the owner or operator;
  - b. Name, address, and telephone number of the facility;
  - c. Date, time and type of incident (e.g., fire, explosion)'
  - d. Name of quantity of material(s) involved;
  - e. The extent of injuries, if any;
  - f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
  - g. Estimated quantity and disposition of recovered material that resulted from the incident.

**SUGGESTED OUTLINE**  
**HAZARDOUS WASTE MANAGEMENT FACILITY CONTINGENCY PLAN**

- I. Facility Identification and General Information
  - A. Name of Facility
  - B. Location
  - C. Owner's Name, Address, Telephone Numbers, and Emails (office and hours)
  - D. Type of Facility
  - E. Facility Site Plan
  - F. Description of Treatment, Storage and Disposal Activities
  
- II. Emergency Coordinator(s)
  - A. Primary Coordinator
  - B. Alternate Coordinator(s)
  - C. Emergency Duties and Authority to Commit Facility Resources
  
- III. Implementation of Contingency Plan
  
- IV. Emergency Response Procedures
  - A. Notification
  - B. Control Containment
  - C. Follow-up
  
- V. Emergency Equipment
  - A. Emergency Equipment Inventory
  - B. Location of Emergency Equipment
  - C. Equipment Capabilities
  - D. Emergency Equipment Available from Other Sources
  
- VI. Coordination Arrangements
  - A. Police
  - B. Fire
  - C. Other Emergency Response Units (Bomb Squad)
  - D. Hospital
  
- VII. Evacuation Plan
  - A. When to Evacuate
  - B. Signals to Begin Evacuation
  - C. Primary Evacuation Routes
  - D. Alternate Evacuation Routes



Citizen Drop off – fluorescent bulb storage.



Citizen Drop off – fluorescent bulb storage.



Citizen Drop Off – waste tire storage area.



Citizen Drop Off – scrap metal drop off, ballast attached to light fixture.



Phase II – viewed from the NW corner



Phase II SW corner – windblown litter



Phase II - viewed from the North.



Phase II - working face in the SE corner of the phase, abutting the eastern side.



Phase II active area - exposed waste outside of the traffic pattern.



Phase II active area - exposed waste outside of the traffic pattern.



Phase II active area - exposed waste outside of the traffic pattern.



Phase II active area - exposed waste outside of the traffic pattern.



Phase II - working face viewed from atop eastern side.



Phase II - working face viewed from atop eastern side.