

January 18, 2016

Mr. Ernest Ely
District Manager
Waste Management Inc. of Florida
North Manatee Recycling and Disposal Facility
14415 County Road 39, Duette, Florida 34219

Subject: 2016 Annual Landfill Inspection Report

EPA 40 CFR Parts 257 and 261

North Manatee Recycling and Disposal Facility 14415 County Road 39, Duette, Florida 34219

Background:

NMRDF is a permitted Class III landfill located in northern Manatee County, on a 208-acre property at 14415 County Road 39 in Duette, Florida. The site lies within Sections 1 and 6, Township 33 South, and Ranges 21 and 22 East in Manatee County, Florida. The main entrance of the facility is located at latitude 29°30'41.6"N, longitude 82°8'48.0"W. The permitted footprint of the landfill is approximately 112 acres. Features of the landfill include a geo-composite liner, a leachate collection and transmission system, a limited gas collection system, and storm water management system. As part of the landfill permitting and approval process, the landfill design has been subject to, but not limited to, slope stability analysis, subgrade settlement analysis, and leachate generation modeling. Construction of landfill cells follow an approved quality assurance plan. At the time of construction, built cells are certified by a qualified professional engineer prior to the placement of waste. All technical specifications and certifications are maintained as part of the operating record.

At this time, four cells (cells 1-4) are constructed. Cell 4 is currently being filled and Cells 1-3 have received intermediate cover. All four cells have received Coal Combustion Residuals (CCR) material.

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Annual Inspection Results:

On January 12, 2016, existing cells 1-4 were inspected by Nick Khoury, P.E. The inspection was performed in accordance with recognized and generally accepted good engineering standards and included the following elements:

- (i) A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., the results of inspections by a qualified person, and results of previous annual inspections); and
- (ii) A visual inspection of the landfill cells containing CCR waste to identify signs of distress or malfunction of the landfill unit. The visual inspection included:
 - 1. The landfill perimeter and associated berms
 - 2. Exterior and interior side slopes
 - 3. Access roads
 - 4. Condition of cover
 - 5. The working face
 - 6. Stormwater infrastructure

No evidence of cracking, excess settlement, cell geometry changes or sloughing was noted on exterior/interior slopes. No actual or potential structural weakness of the cells were noted. In addition, no existing conditions are disrupting or have the potential to disrupt the operation and safety of the landfill cells.

Cover material was in good condition. No malfunction of other landfill features were observed. The overall condition of the landfill was very good. Weekly inspections performed by a qualified staff person were reviewed and were consistent with the annual inspection observations.

The approximate volume of CCR material received at the above facility at the time of inspection is approximately 252,381 tons.

This letter report was prepared in accordance with the requirement of EPA 40 CFR Parts 257 and 261 Federal Regulation Vol. 80, 21302 (April 17, 2015). If you have any questions or concerns with regard to any of the information presented above please feel free to contact me at (954) 956-2215.

No. 69076

Regards,

Nick Khoury, P.E. (License No. 69076)

Engineering Manger

Waste Management Inc. of Florida