



WASTE MANAGEMENT INC. OF FLORIDA
North Manatee Recycling and Disposal Facility
14415 County Road 39
Duette, FL 34219

January 28, 2019

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

RE: 2018 Landfill Inspection Report
EPA 40 CFR Parts 257 and 261
North Manatee Recycling and Disposal Facility
14415 County Road 39, Duette, FL 34219

Background:

NMRDF is a Class III landfill located in northern Manatee County, on a 208-acre property at 14155 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 improvements. As part of the 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. Completed 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, seven cells (cells 1-7) are constructed. Cells 5 and 7 are currently being filled and Cells 1-4 have received a 2-foot clay cover top deck and Cells 1 – 5 have geosynthetic side slope temporary covers. Cells 1-4 received CCR material in 2018.

Annual Inspection Results:

On January 17, 2018, existing cells 1-4 were inspected by Ashley Evans, P.E. The inspection was performed consistent 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 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. Storm water infrastructure

Review of Available Information

On May 11, 2018, the site ceased acceptance of CCR waste. In July 2018, site staff observed potentially unstable behavior in a localized area of the Tampa Electric Company (TECO) material block fill located approximately 10-feet down-slope on the exterior south slope of the landfill. The TECO material was excavated and backfilled with structural fill as the area of potentially unstable behavior was assumed to be surficial. In September, WM decided to cease acceptance of all TECO materials at the site primarily due to H₂S concerns. During September through November, laboratory analyses were conducted to evaluate the CCR material properties and a preliminary slope stability analysis was performed by Geosyntec. During a site visit on December 7, 2018, Geosyntec CCR specialist and engineers performed a site inspection and observed no evidence unstable areas on the exterior slopes. The preliminary stability analysis concluded the site had a sufficient minimum factor of safety of 1.9.

Visual Inspection

No evidence of cracking, excess settlement, cell geometry changes or sloughing was noted with exterior/interior slopes. No actual or potential structural weakness of the cells were noted and vegetative cover was in place. 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 other malfunctions of the landfill construction or maintenance were observed. An additional rain flap and wind defender cover was added to the side slopes of Cells 1-5. Approximately 2-feet of clay was added over the existing CCR material placed in Cells 1 and 4 to isolate rainfall infiltration in this area. Access roads were well maintained as were stormwater components. Drainage features were clear of debris.

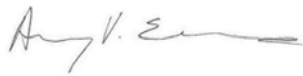
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The overall condition of the landfill was very good. Weekly inspections performed by a qualified staff person were discussed and were consistent with the annual inspection observations.

The approximate volume of CCR material at the time of inspection was 601,000 tons.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley Evans", with a horizontal line extending to the right.

Ashley Evans, P.E.
P.E. License # 71630
Market Area Engineer
Waste Management, Inc. of Florida