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July 22, 2020

**VIA ELECTRONIC MAIL**

David Smicherko, Environmental Manager  
Central District  
Florida Department of Environmental Protection  
3319 Maguire Blvd.Suite232  
Orlando, Florida 32803

**RECEIVED**

JUL 23 2020

DEP Central District

Subject: **Draft Consent Order Comments**  
**Florida Recyclers of Brevard-Melbourne Landfill**  
**WACS # 18444**  
**3351 Sarno Road**  
**Melbourne, FL 32934**

Dear Mr. Smicherko:

The undersigned represents as attorney Florida Recyclers of Brevard (FRB). Please consider this a response to your draft Consent Order dated March, 2020 for the subject facility. Rather than commenting specifically on the consent order, it is our position that a consent order level of enforcement instrument is unwarranted to bring the facility into compliance with Department Rules. Therefore, we request a "Compliance Assistance Offer", commonly used by other Department Districts for minor violations such as alleged for this facility. The draft CAO, a copy of which is attached hereto, is based on the warning letter and consent order which state the following:

"A complaint inspection was conducted at your facility on January 23, 2020. During this inspection, possible violations of Chapter 403, F.S., 62-701, Florida Administrative Code (F.A.C.), and Chapter 62-709, F.A.C. were observed.

During the inspection Department personnel noted the following:

1. Objectionable odors were noted off-site beyond the property boundary.
2. The facility did not have an all-weather access road, at least 20 feet wide, around the perimeter of the site.
3. The facility failed to ensure there were 50 foot fire breaks in the piles of processed and unprocessed material.
4. Processed material has been stored on site for longer than 18 months."

David Smicherko, Environmental Manager  
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The draft COA has a list of recommended corrective actions that will address each of these potential violations and assure that the facility is brought into compliance. Many of these compliance items have been satisfied to date.

Again, it is our position that a COA is more applicable to the alleged minor violations.

The February 4, 2020 warning letter was the first notice to FRB of these alleged violations noted in the inspection. The site has been in operation for over 20 years, and this is the first time these types of issues have been noted in an FDEP inspection.

To address #1, FRB does not believe that their facility is the source on any off-site objectionable odors that may have been detected at New York Avenue, nor at the Westwood condos to the east. FRB has submitted an Odor Remediation Plan, conducted an on-site odor evaluation, and is conducting ongoing on and off-site odor monitoring to comply with the Department's rules for off-site odor prevention. Three months of odor monitoring supports that the FRB facility is not the source of off-site odors, or has remediated potential odor sources on site.

There are numerous potential odor sources surrounding the FRB facility: the Sarno Road Class III landfill (active working face directly west, at the end of New York Ave.); Brevard County Class I transfer station, and the dredge spoil disposal site, due west of the Westwood condos. All these sites have the potential of generating objectionable odors.

We disagree that the cumbersome variance process to Rules 62-701, or 62-709 FAC is required to allow the facility to store processed organic materials for more than 18 months. It is written in the rule: *62-709.330 (2) Processed material shall be removed from the facility within 18 months. However, if a yard processing facility is authorized under another Department solid waste management facility permit, then the department shall authorize on-site storage of processed material for longer than 18 months if the owner or operator demonstrates that there is a quantifiable use for such material for cover, erosion control, closure, or other similar activities at that permitted facility.* This statement allows the Department to authorize the longer storage thru a solid waste disposal facility demonstration, commonly completed thru an Operations Plan or permit modification. The draft COA offers this simpler solution to the organics storage issue.

The non-compliance items listed in the warning letter and consent order, according to the Departments' enforcement guidelines, are all "minor" deviations from the solid waste rules. These are FRB's first alleged violations, and they have shown good faith actions to comply. Therefore, fines, and a consent odor are not warranted to force compliance.

David Smicherko, Environmental Manager  
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FRB is committed to maintaining compliance with Department regulations. We are looking forward to your comments on this offer, or your offer to conduct a virtual meeting to discuss.

Very truly yours,

*/s/ Jack Kirschenbaum*

Jack Kirschenbaum

JAK/kf

Attachments

cc: James E. Golden, P.G.



# FLORIDA DEPARTMENT OF Environmental Protection

Central District Office 3319 Maguire  
Blvd. Suite 232 Orlando, FL 32803

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

July , 2019

Mr. Art F. Evans, Managing Member  
Florida Recyclers of Brevard, LLC  
1698 W. Hibiscus Blvd. Suite A  
Melbourne, FL 32937  
[Art.fmdc@gmail.com](mailto:Art.fmdc@gmail.com)

Re: Compliance Assistance Offer  
Florida Recyclers of Brevard LLC.  
WACS # 18444-Melborne Landfill  
Brevard County

Dear Mr. Evans:

A solid waste management facility compliant inspection was conducted at the above referenced facility on January 23, 2020. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Specifically, potential non-compliance with the requirements of Chapter 403, Florida Statutes, Chapter 62-701 and Chapter 62-709, Florida Administrative Code (F.A.C.) were observed. Please see the attached inspection report (or Warning letter) for a full account of Department observations and recommendations. The following potential non-compliance items were observed during the inspection:

1. Objectionable odors were noted off-site beyond the property boundary.
2. The facility did not have an all-weather access road, at least 20 feet wide, around the perimeter of the site.
3. The facility failed to ensure there were 50 foot fire breaks in the piles of processed and unprocessed material.
4. Processed material has been stored on site for longer than 18 months."

A list of Recommendations for Corrective Action is attached to bring these items into compliance is attached.

We request you review the item(s) of concern noted and respond in writing within **30 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

<https://floridadep.gov/>

1. Describe what has been done to resolve the non-compliance issue(s) or provide a schedule describing how/when the issue(s) will be addressed.
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your site to discuss the item(s) of concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Ms. Mary Powers of the Central District Office at (407) 897-2921 or via e-mail at [mary.powers@floridadep.gov](mailto:mary.powers@floridadep.gov). We look forward to your cooperation with this matter.

Sincerely,

David Smicherko, Environmental Manager  
Central District  
Florida Department of Environmental Protection

Enclosures: Inspection Report

cc:



# Department of Environmental Protection Solid Waste Facility Inspection Report

## Recommendations for Corrective Action

### **1.) Odor Remediation Plan**

Objectionable odors were noted off-site that potentially could be attributed to the facility. An Odor Remediation Plan in accordance with Rule 62-701.530 (3)(b) must be developed for the facility by a Florida licensed Professional Engineer. Immediately take steps to reduce any objectionable odors. Such steps may include applying or increasing initial cover, reducing the size of the working face, increased turning of compost piles, and ceasing operations in the areas where odors have been detected. Submit to the Department for approval an odor remediation plan for the gas releases. The plan shall describe the nature and extent of the problem and the proposed long-term remedy. The remedy shall be initiated within 30 days of approval.

### **2.) Routine Odor Monitoring Program**

The facility shall implement a routine odor monitoring program to determine the timing and extent of any off-site odors, and to evaluate the effectiveness of the odor remediation plan. Retain records of odor monitoring at the facility and submit monthly reports to the Department until the ORP has been proven effective.

### **3.) Maintain All-Weather Perimeter Road**

A continuous 20-foot wide perimeter access road was not observed. Facility must maintain an all-weather perimeter access road, at least 20-feet wide at all times. The Operator must conduct a self-inspection of the road daily, and make immediate corrective action to maintain the road. Written records of the results of these inspections must be retained for a minimum of three years.

### **4.) Maintain Fire Breaks Between Organics Piles**

50-foot fire breaks were not observed between all processed and unprocessed materials. The facility must maintain fire breaks between piles of processed and unprocessed organics to insure a maximum of 50 feet access from firefighting equipment. The Operator must conduct a self-inspection of the fire breaks daily, and make immediate corrective action to maintain the fire breaks. Written records of the results of these inspections must be retained for a minimum of three years.

### **5.) Demonstrate Need to Store Processed Organics for More Than 18 Months**

Processed organics materials were observed to be stored more than 18 months. The yard trash processing is conducted on a permitted construction and demolition debris disposal facility. In accordance with Rule 62-709.330 (2), the facility shall provide the Department with a demonstration that there is a quantifiable use for such material for cover, erosion control, closure, or other similar activities at that permitted facility to allow the Department to authorize on-site storage of processed material for longer than 18 months. The facility shall submit the demonstration to the Department either in an Operations Plan and Closure Plan modifications, or minor permit modification.





Florida Department of  
Environmental Protection  
Inspection Checklist

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**FACILITY INFORMATION:**

**Facility Name:** MELBOURNE LANDFILL (AKA FLORIDA RECYCLERS OF BREVARD)  
**On-site Inspection Start Date:** 01/23/2020  
**On-site Inspection End Date:** 01/23/2020  
**WACS No.:** 18444  
**Facility Street Address:** 3351 SARNO ROAD  
**City:** MELBOURNE  
**County Name:** BREVARD  
**Zip:** 32934

**INSPECTION PARTICIPANTS:**

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Mary Powers, Inspector

Other Participants: Andrew Cannella, Manager;

**INSPECTION TYPE:**

Complaint Investigation Inspection for C&D Debris Disposal Facility

**ATTACHMENTS TO THE INSPECTION CHECKLIST:**

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

**Note: Checklist items with shaded boxes are for informational purposes only.**

10.0 - SECTION 10.0 - REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES

**MELBOURNE LANDFILL (AKA FLORIDA RECYCLERS OF BREVARD)**

Inspection Date: 01/23/2020

**10.0 - SECTION 10.0 - REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES****Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

<b>FACILITY TYPE(S)</b>	<b>MATERIAL(S) PROCESSED</b>	<b>PRODUCES</b>	<b>METHOD OF COMPOSTING</b>
<input type="checkbox"/> Yard Trash Transfer Station	<input checked="" type="checkbox"/> Yard Trash	<input checked="" type="checkbox"/> Mulch	<input type="checkbox"/> Windrow
<input checked="" type="checkbox"/> Yard Trash Recycling	<input type="checkbox"/> Manure	<input type="checkbox"/> Firewood	<input type="checkbox"/> Passive aerated windrows
	<input type="checkbox"/> Animal byproducts	<input type="checkbox"/> Fuel	<input type="checkbox"/> Aerated static piles
	<input type="checkbox"/> Pre-consumer vegetative waste	<input type="checkbox"/> Compost	<input type="checkbox"/> In-vessel composting
	<input type="checkbox"/> Vegetative waste	<input type="checkbox"/> Soil Amendment	
		<input type="checkbox"/> Soil	
		<input type="checkbox"/> Other	

<b>Item No.</b>	<b>REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ALL REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES</b>	<b>Ok</b>	<b>Not Ok</b>	<b>Unk</b>	<b>N/A</b>
10.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted or registered solid waste management facility or other exempt facility? 62-701.300(1)(a)		✓		
10.2	Have objectionable odors been caused or allowed in violation of Chapter 62-296, F.A.C.? 62-709.300(7)(a)		✓		
10.3	Unauthorized storage or processing in a way or location that violates air quality or water quality standards? 62-709.300(7)(b), 62-701.300(1)(b)	✓			
10.4	Do geological formations or subsurface features provide support for the facility? 62-709.300(7)(b), 62-701.300(2)(a)	✓			
10.5	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e), 62-709.320(3)	✓			
10.6	Unauthorized storage or processing in any natural or artificial water body (e.g. ground water and wetlands within DEP jurisdiction)? 62-709.300(7)(b), 62-701.300(2)(d)	✓			
10.7	Unauthorized storage or processing on the right of way of any public highway, road, or alley? 62-709.300(7)(b), 62-701.300(2)(f)	✓			
10.8	Unauthorized open burning of solid waste except in accordance with Department requirements? 62-709.300(7)(b), 62-701.300(3)	✓			
10.9	Unauthorized incorporation of CCA treated wood into material that will be applied as a ground cover, soil or soil amendment? 62-709.300(7)(b), 62-701.300(14)	✓			
10.10	Unauthorized unconfined emissions of particulate matter in violation of paragraph 62-296.320(4)(c), F.A.C.? 62-709.300(7)(b), 62-701.300(15)	✓			
10.11	Does the facility have the necessary operational features and equipment - unless otherwise specified? Including: 62-709.320(2)(a)				
10.11.1	Effective barrier to prevent unauthorized entry and dumping? 62-709.320(2)(a)1	✓			
10.11.2	Dust and litter control methods? 62-709.320(2)(a)2	✓			
10.12	Does the facility have the necessary fire protection and control provisions to deal with accidental burning of solid waste? Including 62-709.320(2)(a)3				
10.12.1	20-foot all-weather access road all around the perimeter? 62-709.320(2)(a)3.a.		✓		
10.12.2	No material mechanically compacted? 62-709.320(2)(a)3.b.	✓			



**MELBOURNE LANDFILL (AKA FLORIDA RECYCLERS OF BREVARD)**

Inspection Date: 01/23/2020

Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ALL REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES	Ok	Not Ok	Unk	N/A
10.12.3	No material more than 50 feet from access by motorized firefighting equipment? 62-709.320(2)(a)3.c.		✓		
10.13	Is the facility operated in a manner to control vectors? 62-709.320(2)(b)	✓			
10.14	Is the facility operated in a manner to control objectionable odors per with Rule 62-296.320(2), F.A.C.? 62-709.320(2)(c)		✓		
10.15	Are any installed drains and leachate or condensate conveyances kept cleaned? 62-709.320(2)(d)				✓
10.16	Is the received solid waste processed timely as follows? 62-709.320(2)(e)				
10.16.1	Is yard trash size-reduced or removed within 6 months or time needed to receive 3,000 tons or 12,000 cubic yards, whichever is greater? (Separated logs with 6 inch diameter or greater can be stored for up to 12 months before being size-reduced or removed.) 62-709.320(2)(e)1	✓			
10.16.2	Is putrescible waste (e.g. vegetative wastes, animal byproducts or manure) processed and incorporated into the composting material, or removed from the facility, within 48 hours? 62-709.320(2)(e)2	✓			
10.17	Is any treated or untreated biomedical waste; hazardous waste; or any materials having (PCB) concentration of 50 ppm or greater containerized and removed immediately? 62-709.320(2)(f), 62-701.300(4), 62-701.300(5), 62-701.300(6)	✓			
10.18	Have all residuals, solid waste and recyclable materials been removed and recycled or disposed and has any remaining processed material been properly used or disposed upon the facility ceasing operations? 62-709.320(2)(g)				✓
10.19	If temperature is used to show disinfection or vector attraction achieved, are records kept for at least three years? 62-709.320(4)(b)				✓
10.20	Is the registration for the facility current and on file with the Department? 62-709.320(3)(b)				✓
10.21	Are renewal applications for annual registration of the facility submitted to the Department by July 1st, if applicable? 62-709.320(3)(c)				✓
10.22	Are monthly records of incoming and outgoing material kept on-site or at another location as indicated on the registration form for at least three years? 62-709.320(4)(a)	✓			
10.23	Are Annual Reports, based upon the preceding calendar year, summarizing monthly records, submitted to the Department as required? 62-709.320(4)(a)	✓			
Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO YARD TRASH ONLY FACILITIES	Ok	Not Ok	Unk	N/A
10.24	Unauthorized storage or processing within 100 feet from off-site potable water well that existed before facility registered? 62-709.300(7)(b) and 62-701.300(12)(a)	✓			
10.25	Unauthorized storage or processing within 50 feet from any body of water, including wetlands? (Does not include parts of permitted stormwater system, or water bodies totally within facility with no discharge to surface waters.) 62-709.300(7)(b), 62-701.300(12)(b)	✓			
10.26	Is processed material removed from facility within 18 months, unless longer storage authorized by permit? 62-709.330(2)		✓		
10.27	Is the facility accepting only yard trash, and bags used to collect yard trash and containerizing any other material? 62-709.330(3)	✓			
Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ONLY THOSE FACILITIES THAT BLEND MANURE OR COMPOST VEGETATIVE WASTES, ANIMAL BYPRODUCTS OR MANURE	Ok	Not Ok	Unk	N/A
10.28	Unauthorized storage or processing within 500 feet off-site potable water well that existed before facility registered? 62-709.300(7)(b) and 62-701.300(2)(b)				✓
10.29	Unauthorized storage or processing within 200 feet from any body of water, including wetlands? (Does not include parts of permitted stormwater system, or water bodies totally within facility with no discharge to surface waters.) 62-709.300(7)(b), 62-701.300(2)(e)				✓
10.30	Unauthorized storage or processing within 10,000 feet of any licensed and operating airport runway used by turbine powered aircraft, or within 5,000 feet of any licensed and operating airport runway used only by piston engine aircraft, unless applicant demonstrates that the facility is designed and will be operated so that it does not pose a bird hazard to aircraft? 62-709.300(7)(b), 62-701.320(13)(b)				✓

**MELBOURNE LANDFILL (AKA FLORIDA RECYCLERS OF BREVARD)**

Inspection Date: 01/23/2020

Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ONLY THOSE FACILITIES THAT BLEND MANURE OR COMPOST VEGETATIVE WASTES, ANIMAL BYPRODUCTS OR MANURE	Ok	Not Ok	Unk	N/A
10.31	Is the carbon:nitrogen ratio of the blended feedstocks greater than 20? 62-709.350(2)				✓
10.32	Do piles exceed 12 feet in height? 62-709.350(3)				✓
10.33	Is all material removed within 18 months, unless longer storage authorized by permit? 62-709.350(5)				✓
10.34	Is there documentation showing that disinfection has been achieved? Note that this is not required if they are composting only pre-consumer vegetative waste with or without yard trash. 62-709.350(6)				✓
10.35	Is there vector attraction reduction controls that include one of the following? 62-709.350(7) <input type="checkbox"/> Temperature monitoring records showing the waste was composted for at least 14 days, with temperature no lower than 40 degrees Celsius and average temperature of the material being composted higher than 45 degrees Celsius. or 62-709.350(7)(a) <input type="checkbox"/> Results of testing showing the specific oxygen uptake rate (SOUR) for material being composted or blended equal to or less than 1.5 milligrams of oxygen per hour per gram of total solids (dry weight basis) at a temperature of 20 degrees Celsius. 62-709.350(7)(b)				✓

Inspection Date: 01/23/2020

**Current Violations:**

Rule: 62-709.320(2)(a)3.a.

Question Number: 10.12.1

Explanation: There shall be an all-weather access road, at least 20 feet wide, all around the perimeter of the site.

Specifically, Florida Recyclers does not have an all-weather access road, at least 20 feet wide, all around the perimeter of the site.

Corrective Action: Within 30 days of receiving this report, install an all-weather access road at least 20 feet in width around the perimeter of the facility.

Rule: 62-709.320(2)(a)3.c.

Question Number: 10.12.3

Explanation: None of the processed or unprocessed material shall be more than 50 feet from access by motorized firefighting equipment.

Specifically, Florida Recyclers failed to ensure none of the processed or unprocessed material was more than 50 feet from access by motorized firefighting equipment.

Corrective Action: Within 30 days of receiving this report, the owner/operator shall install 50 foot fire breaks through larger piles of debris to create adequately sized internal fire lanes. Within 5 days of completion of corrective activities please notify the Department so that a follow up inspection can be conducted.

Rule: 62-709.320(2)(c)

Question Number: 10.14

Explanation: The facility shall be operated in a manner to control objectionable odors in accordance with subsection 62-296.320(2), F.A.C.

Specifically, Florida Recyclers failed to operate in a manner to control objectionable odors in accordance with subsection 62-296.320(2), F.A.C. Since off site odors were detected beyond the property boundary.

Corrective Action: Operate the facility in a manner so as to eliminate objectionable odors from leaving the site.

Rule: 62-701.300(1)(a)

Question Number: 10.1

Explanation: Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted or registered solid waste management facility or other exempt facility? 62-701.300(1)(a)

Corrective Action: Within 60 days of receiving this report, remove all processed material that has remained on site at the facility for longer than 18 months

Inspection Date: 01/23/2020

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Rule: 62-709.300(7)(a)

Question Number: 10.2

Explanation: No person shall cause or allow the discharge of air pollutants that cause objectionable odor in violation of Chapter 62-296, F.A.C.

Specifically, Florida Recyclers failed to control objectionable odors off site beyond the property boundary.

Corrective Action: See Corrective Actions listed for Question Number 10.14.

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Rule: 62-709.330(2)

Question Number: 10.26

Explanation: Processed material shall be removed from the facility within 18 months. However, if a yard processing facility is authorized under another Department solid waste management facility permit, then the department shall authorize on-site storage of processed material for longer than 18 months if the owner or operator demonstrates that there is a quantifiable use for such material for cover, erosion control, closure, or other similar activities at that permitted facility. Specifically, Florida Recyclers has failed to remove processed material from the facility within 18 months. A longer period of storage is not authorized by their permit.

Corrective Action: Within 60 days of receiving this report, remove all processed material that has remained on site at the facility for longer than 18 months

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Inspection Date: 01/23/2020

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**COMMENTS:**

Permit 0133456-012-SO-MM Issued: 04/13/2017

Permit Renewal Application Due Date: 4/1/2024

Permit Expires: 6/1/2024

On January 23, 2020 at 8:17 A.M., no odor was detected at Ridgewood Club Condominium, which lies to the east of Florida Recyclers. At 8:20 A.M., a musty, earthy odor was detected on New York avenue located southeast of Florida Recyclers. At 8:31 A.M., Mary Powers of DEP met with Andrew Cannella, Manager of Florida Recyclers, and the on site inspection began.

A large compost pile exists in the southeast corner of the facility that Andrew Canella stated is approximately 5 years old (Fig. 1). This is a violation of Rule 62-709.330(2), F.A.C., listed above, which states that "processed material shall be removed from the facility within 18 months. However, if a yard processing facility is authorized under another Department solid waste management facility permit, then the department shall authorize on-site storage of processed material for longer than 18 months if the owner or operator demonstrates that there is a quantifiable use for such material for cover, erosion control, closure, or other similar activities at that permitted facility."

The compost pile is adjacent to the C&D working face of the facility (Fig. 2). An odor similar to the one detected off site was noted in this area.

Additionally, large piles of compost exist in the central part of the property (Fig. 3). Steam was observed emanating and dispersing from the piles of compost; most notably when a pile was being turned by use of an excavator (Fig. 4). Freshly ground yard waste is located next to the compost piles that exist in the central part of the property (Fig. 5).

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**ATTACHMENTS:**

Fig. 1 Large compost pile



Fig. 2 C&amp;D adjacent to compost



Inspection Date: 01/23/2020

Fig. 3 Central compost piles



Fig. 4 Steam off compost piles



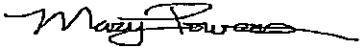
Fig. 5 freshly ground yard waste





**MELBOURNE LANDFILL (AKA FLORIDA RECYCLERS OF BREVARD)**

Inspection Date: 01/23/2020

**Signed:**Mary PowersInspector**PRINCIPAL INSPECTOR NAME****PRINCIPAL INSPECTOR TITLE**FDEP01/29/2020**PRINCIPAL INSPECTOR SIGNATURE****ORGANIZATION****DATE**Andrew CannellaManager**REPRESENTATIVE NAME****REPRESENTATIVE TITLE**NO SIGNATURE REQUIRED**REPRESENTATIVE SIGNATURE****ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

**Report Approvers:****Approver:** David Smicherko**Inspection Approval Date:** 01/30/2020