



EXHIBIT C



engineers • surveyors • planners, inc.

Wood Resource Recovery Operations Plan



Location:

Wood Resources Recovery, LLC
10606 N. State Road 121
(Parcel Number 05946-001-000)

Prepared By:

eda engineers-surveyors-planners, inc.

Section 1 - General

1.1 Purpose

The purpose of this Operations Plan is to describe the operation, maintenance, equipment, personnel, emergency and contingency procedures for the Wood Resources Recovery facility located on N. State Road 121 in Alachua County, FL. This plan is submitted with our special exception application and in conformance with the requirements of Chapter 404.16 in the Alachua County Unified Land Development Code (ULDC). This Operations Plan is intended to be used as an operations and maintenance manual for on-site personnel.

1.2 Facility Characteristics

Attached to this plan is a Master Plan that shows the type and location of all proposed activities, setbacks, buildings, parking areas, stockpiles, ingress/egress, etc. Wood Resource Recovery (WRR) is an existing wood processing facility located on 15 acres at 10606 N. State Road 121 in Alachua County (parcel number 05946-001-000). A Special Use Permit (SUP) for this facility was approved by the BoCC in 1997 to allow a tree service and wood recycling center in the "A" (Agriculture) District. The WRR facility has continually operated on-site from 1997 to the present date under this approved SUP. The facility is applying for a Special Exception application to permit a 'wood processing facility' as identified in the ULDC Ch. 404, Article 2.

The facility processes and transfers vegetative material (clean wood materials and yard waste) acquired from various sources, including other tree trimming contractors, landscape maintenance contractors, landowners, and the applicant's own silviculture activity and tree trimming service. The clean wood and yard waste are processed into pulpwood, firewood, lumber, fuel, soil amendment, woodchips, and mulch. Equipment used within the facility includes, but is not limited to a chipper, tub grinder, portable sawmill, excavator, front-end loader, and screening machines.

1.3 Management and Operations Personnel

Personnel trained to process material and operate large equipment are designated to operate the facility. Typical staff on-site consists of 1 scale operator, 1 facility supervisor, and 1 to 2 spotter/equipment operators for the front end loader, excavator and screening equipment. When material is both being processed and removed from the site simultaneously, additional men and equipment are required. The facility supervisor is responsible for managing implementation of the Operations Plan and associated Contingency Plans.

1.4 Regulation and Definition of Wood Processing Facility

The definition and use specific regulations for a Wood Processing Facility are including in the ULDC and indicated below:

Chapter 410 – Definitions

Wood Processing Facility: *A facility that processes and sells non-treated wood products or byproducts. Products produced from a wood processing facility may include composting, wood chips, lumber, fuel or soil amendment or any combination of such materials.*

Section 404.16 Wood Processing Facilities

Wood Processing Facilities may be allowed by Special Exception in the A district subject to development plan approval by the Development Review Committee and the following standards.

(a) Minimum Lot Size

The minimum lot area shall be 15 acres.

(b) Access

The site must have direct access on a paved public road.

(c) Setbacks

All buildings and stock piles shall meet the required setbacks of the zoning district or the setbacks that would be required to meet Florida Fire Prevention Code standards, whichever is greater.

(d) Buffering

At minimum, a 25 foot wide medium-density buffer consistent with Table 407.43.2 in Chapter 407 of this ULDC shall be provided if the facility is located adjacent to existing single family uses or property with residential zoning. Buffers may be increased and may also be required from other adjacent uses if warranted based on an analysis of the noise, dust, visual impact or other potential negative impacts of the Wood Processing Facility on those adjacent uses.

(e) Storage of Materials

All materials processed or stockpiled shall be screened from view of a public right-of-way by an opaque fence or wall or by existing landscaping that provides equal opacity.

(f) Florida Fire Prevention Code

The facility and operations must comply with the Florida Fire Prevention Code.

(g) Operations Plan

As part of the special exemption application, an Operations Plan shall be submitted that includes the following information:

- 1. Site plan that indicates the type and location of all proposed activities, buffers buildings, parking, storage of any wood or wood products, equipment or materials and ingress and egress.*
- 2. Manner of processing wood products at the facility, including specifics on recycling, hauling, composting and other operations.*
- 3. Whether or not any of the processed wood will be available for retail sale, with all sales areas indicated on the site plan.*
- 4. How the facility and operations comply with the Florida Fire Prevention Code.*

5. *Days and hours of operations.*

1.5 Definitions and Registration of Yard Trash Processing Facilities

The facility is currently registered with the Florida Department of Environmental Protection as a Yard Trash Processing Facility, and shall comply with the following Florida Administrative Code criteria:

62-709.201 Definitions.

(25) "Yard trash" means vegetative matter resulting from landscaping maintenance or land clearing operations and includes materials such as tree and shrub trimmings, grass clippings, palm fronds, trees and tree stumps, and associated rocks and soils. For purposes of this chapter, it also includes clean wood.

(26) "Yard trash processing facility" means a yard trash transfer station or a facility at which yard trash is processed into a size-reduced, usable material or is composted, but does not include a facility used for the disposal of yard trash.

62-709.320 General Provisions for Registrations.

(1) Applicability.

(a) Owners or operators of yard trash processing facilities, facilities composting vegetative waste, animal byproducts or manure with or without yard trash, and manure blending operations that meet the criteria of this rule and Rule 62-709.330 or 62-709.350 shall register annually with the Department in accordance with subsection 62-709.320(5), F.A.C., in lieu of obtaining a permit under subsection 62-709.320(3), F.A.C. However, if these criteria are not met then a solid waste management facility permit is required:

- 1. In accordance with Chapter 62-701, F.A.C., for disposal operations or transfer stations; or*
- 2. In accordance with subsection 62-709.300(3), F.A.C., for composting or processing operations or Rule 62-709.460, F.A.C., for qualifying pilot projects.*

(b) Owners or operators of solid waste facilities that meet the criteria of this rule and either Rule 62-709.330 or 62-709.350, F.A.C., are not subject to the requirements of Rules 62-709.500, 62-709.510 and 62-709.530, F.A.C., unless otherwise specified in this chapter. However, they are subject to the requirements in Rules 62-709.300, 62-709.550 and 62-709.600, F.A.C.

(c) If a facility is already authorized under another Department solid waste management facility permit, then facility registration under this rule is not required as long as that permit remains valid. However, an annual report must still be submitted.

(d) Registrations issued under this chapter are considered to be the equivalent of operation permits for purposes of any notice requirements of Chapter 403, F.S. or Rule 62-110.106, F.A.C.

(2) Design and operating requirements.

(a) The facility shall have the operational features and equipment necessary to maintain a clean and orderly operation. Unless otherwise specified in Rule 62-709.330 or 62-709.350, F.A.C., these provisions shall include:

- 1. An effective barrier to prevent unauthorized entry and dumping into the facility site;*
- 2. Dust and litter control methods; and*
- 3. Fire protection and control provisions to deal with accidental burning of solid waste, including:
 - a. There shall be an all-weather access road, at least 20 feet wide, all around the perimeter of the site;*
 - b. None of the processed or unprocessed material shall be mechanically compacted; and*
 - c. None of the processed or unprocessed material shall be more than 50 feet from access by motorized firefighting equipment.**

(b) The facility shall be operated in a manner to control vectors.

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

(d) Any drains and leachate or condensate conveyances that have been installed shall be kept clean so that flow is not impeded.

(e) Solid waste received at a registered facility must be processed timely as follows:

- 1. Any yard trash, including clean wood, received at the facility shall be size-reduced or removed within 6 months, or within the period required to receive 3,000 tons or 12,000 cubic yards, whichever is greater. However, logs with a diameter of 6 inches or greater may be stored for up to 12 months before they are size-reduced or removed, provided the logs are separated and stored apart from other materials on site.*
- 2. Any putrescible waste such as vegetative wastes, animal byproducts or manure received at a facility shall be processed and incorporated into the composting material, or removed from the facility, within 48 hours of receipt.*

(f) If any of the following materials are discovered, they shall be immediately containerized and removed from the facility: treated or untreated biomedical waste; hazardous waste; or any materials containing a polychlorinated biphenyl (PCB) concentration of 50 parts per million or greater.

(g) When a registered facility ceases operation, all residuals, solid waste, and recyclable materials shall be removed from the site and recycled, or disposed of pursuant to the

requirements of Chapter 62-701, F.A.C. Any remaining processed material shall be used in accordance with the requirements of this rule or disposed of pursuant to the requirements of Chapter 62-701, F.A.C.

(3) Registration. Owners or operators of solid waste facilities, that qualify for registration, shall register with the Department before beginning operation, unless they are operating under a solid waste management facility permit as specified in paragraph (1)(c) of this rule.

(a) Registration shall be submitted on Form 62-709.901(3), Application for Registration and Annual Report for a Yard Trash Transfer Station or Solid Waste Organics Recycling Facility, effective date February 15, 2010, hereby adopted and incorporated by reference. Copies of this form are available from a local District Office or by writing to the Department of Environmental Protection, Solid Waste Section, MS 4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 or from the Department web page at http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-709.htm.

(b) The registrant shall provide the facility name, physical address where the facility is located, mailing address, street mailing address, contact name, email address and telephone number, and affirm that facility design and operations comply with the requirements of this rule and Rule 62-709.330 or 62-709.350, F.A.C. The registrant shall also provide documentation that the registrant either owns the land or has legal authorization from the landowner to operate a solid waste organics recycling facility on that site.

(c) Renewal applications for registrations pursuant to Rule 62-709.330 or 62-709.350, F.A.C., shall be submitted annually by July 1.

(d) The application for registration shall include the annual report required in subsection (4) of this rule. Owners and operators of solid waste organics recycling facilities that are submitting registration applications and have not begun operating during the applicable calendar year are not required to submit the annual report for that calendar year.

(4) Record keeping and reporting.

(a) Monthly records of incoming and outgoing material shall be kept on site or at another location as indicated on the registration form for at least three years. The values may be in cubic yards or tonnage, but the same unit of measurement shall be used to record both incoming and outgoing material. An annual report, based on the preceding calendar year, shall summarize the monthly records and shall be submitted by July 1 to the Department using Form 62-709.901(3), Application for Registration and Annual Report for a Yard Trash Transfer Station or Solid Waste Organics Recycling Facility, effective date February 15, 2010, hereby adopted and incorporated by reference. Copies of this form are available from a local District Office or by writing to the Department of Environmental Protection, Solid Waste Section, MS 4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 or from the Department web page at

http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-709.htm. The registrant may submit the annual report to the Department electronically. The initial annual report for existing facilities shall also include a current site inventory of materials.

(b) If temperature monitoring will be used to demonstrate that disinfection has been achieved or that vector attraction has been achieved, then these records shall be kept for at least three years. These records shall be made available upon request.

62-709.330 Specific Criteria for Registration of Yard Trash Processing Facilities.

(1) A facility accepting only yard trash shall meet the criteria in this rule in addition to the provisions of Rule 62-709.320, F.A.C.

(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.

(3) Only yard trash, and bags used to collect yard trash, shall be accepted at the yard trash processing facility. Any other material shall be containerized.

Section 2 - Operations

2.1 Operations Overview

The facility, which has been in place since 1997, includes the processing and transfer of vegetative material (clean wood materials and yard waste) acquired from various sources, including other tree trimming contractors, landscape maintenance contractors, landowners, and the applicant's own silviculture activity and tree trimming service. The clean wood and yard waste are processed into pulpwood, firewood, lumber, fuel, soil amendment, woodchips, and mulch. Equipment used within the facility includes, but is not limited to a chipper, tub grinder, portable sawmill, excavator, front-end loader, and screening machines.

Composting of vegetative material shall be permitted, and topsoil created by composting may be sold from the site. No grading or excavation of the site in order to remove the existing topsoil (below natural grade) shall be allowed. No open burning of vegetative debris shall be permitted on the property.

Facility operations shall be conducted in conformance with good site management practices including dust control from traffic, control of wind-borne debris, and normally accepted measures of fire prevention. The facility shall comply with all federal, state, and local laws, rules, regulations, and ordinances, now and hereafter in force, which may be applicable to the use of the site. The applicant shall obtain all necessary permits required by other local, state, or federal agencies for the operation of this facility. This permit shall be valid only as long as

all other required permits are in effect and the facility is operated in conformance with the requirements of those other agencies.

The working areas and overall layout for activities are identified on the Master Plan. Incoming vehicles enter the site through the entrance road connecting to S.R. 121. Vehicles are directed to enter the site at the scale to weigh in their materials to generate a ticket. Then drivers are directed to dump debris within the designated location, depending on the type of material. When the site approaches capacity, the grinder is mobilized to process material in the area. Debris is ground or screened to specifications for the appropriate market and stored in designated stockpile areas until sold to customers. Finished material is loaded into trucks for hauling off-site. When exiting the composting, stockpiling, and recycling area, trucks are directed to the scale so that weights can be recorded. All on-site retail sales will take place in the designated area on the Master Plan.

2.2 Special Exception Conditions

The proposed Special Exception includes proposed conditions to provide specific operational criteria that must be followed throughout the life span of the project. The proposed conditions are listed below:

- 1. This Special Exception is issued to Wood Resource Recovery for the processing and transfer of vegetative material (clean wood materials and yard waste) acquired from various sources, including other tree trimming contractors, landscape maintenance contractors, landowners, and the applicant's own silviculture activity and tree trimming service. The clean wood and yard waste are processed into pulpwood, firewood, lumber, fuel, soil amendment, woodchips, and mulch. Composting of vegetative material shall be permitted, and topsoil created by composting may be sold from the site. No grading or excavation of the site in order to remove the existing topsoil (below natural grade) shall be allowed by the Special Exception. No open burning of vegetative debris shall be permitted on the property. In the event of transfer of this business to any other operating entity, the Zoning Administrator shall be notified within 1 month.*
- 2. A Revised Final Development Plan shall be submitted within 30 days of the approval of the Special Exception by the County Commission. The Development Plan shall include an earthwork plan showing post-grade topography, equipment operation and stockpiling layout, stormwater management plan, and sedimentation/erosion control plan.*
- 3. Facility operations shall be conducted in conformance with good site management practices including dust control from traffic, control of wind-borne debris, and normally accepted measures of fire prevention. Noise levels caused by the operation of the facility, including, but not limited to, the chipper, tub grinder, or portable sawmill, shall not exceed fifty (50) decibels at any off-site location.*
- 4. A 15'-wide cleared area / fire break shall be maintained along the northern, western, and southern boundaries of the 15-acre site. This setback shall be plowed regularly to keep mineral soil exposed. This setback is intended as a fire break and to provide access for fire protection. The setback shall be maintained and cleared of vegetation*

which would hinder the passage of fire fighting vehicles. Buildings, parking, or storage of any wood or wood products (processed or unprocessed vegetative matter), equipment or materials shall not be permitted within the setback area. A 25' medium density landscape buffer shall be added along the north, west and south property lines at such time that the Plum Creek PD develops the phase thats adjacent to this facility.

- 5. Any buildings or parking and storage area for vehicles shall be located a minimum of 50' from any boundary of the 15-acre site.*
- 6. The areas for storage and processing of the various vegetative materials shall be designated on the Development Plan and shall comply with the criteria stated in Condition 11.*
- 7. The applicant shall comply with all federal, state, and local laws, rules, regulations, and ordinances, now and hereafter in force, which may be applicable to the use of the site. The applicant shall obtain all necessary permits required by other local, state, or federal agencies for the operation of this facility. This permit shall be valid only as long as all other required permits are in effect and the facility is operated in conformance with the requirements of those other agencies.*
- 8. Any operation of equipment, including, but not limited to, a chipper, tub grinder, or portable sawmill, which creates noise audible off the site, shall be limited to daylight hours.*
- 9. Any outdoor lighting on site shall be low intensity and designed to direct the light down and away from the surrounding property.*
- 10. Retail sales to the public shall be permitted at the site. The applicant may also deliver products to off-site purchasers.*
- 11. The applicant shall follow the recommended practices for establishing and maintaining the stored materials (both processed and unprocessed vegetation) contained in the NFPA 230, Standard for the Fire Protection of Storage (2003 Edition), Chapter 11.6 (Protection of Storage of Forest Products).*
- 12. The applicant shall supply to Alachua County on an annual basis data reflecting the amount of incoming and outgoing material at the facility.*
- 13. Access to the site, as well as areas of the site open to public access, must meet the County's off-street parking requirements by providing a hard surface. Alternative surfaces will be permissible in the remaining portions of the site. If these areas are found to be creating erosion problems or hazards to the public, the applicant may be required to take corrective action, such as providing all-weather surfaces.*
- 14. There shall be no direct wetland impacts associated with the facility.*
- 15. There shall be no chemical treatment of wood or wood products associated with this facility.*
- 16. A 10,000 gallon above ground storage tank for fire protection with supply provided via on-site well shall be provided to serve the facility.*
- 17. Violation of any of the terms and conditions of this Special Exception shall be grounds for suspension or revocation by the Board of County Commissioners.*

2.3 Unacceptable Materials

When unauthorized waste is discovered, the equipment operator must either move the unauthorized waste away from the active area for later removal and proper management, or must stop operation and notify another person who will come to the active area and remove the unauthorized waste before operation is resumed. Any unauthorized waste will be hauled from the site and delivered to an appropriately permitted facility.

2.4 Stormwater

The site is served by an existing stormwater basin on the north side of the property, as indicated on the site plan. All runoff from the site is directed to the stormwater basin.

2.5 Hours of Operation

The WRR facility is open to the public Monday through Friday from 8 am – 5 pm. The facility is closed to the public, but open for wood processing Monday – Saturday during daylight hours, the only exception being under emergency conditions where there is an immediate need to accept storm debris, etc.

2.6 Noise

As indicated in special exception condition #8, Any operation of equipment, including, but not limited to, a chipper, tub grinder, or portable sawmill, which creates noise audible off the site, shall be limited to daylight hours.

2.7 Odors

The following actions should be taken to prevent fugitive odors and particulates from creating nuisance conditions:

1. Rejection of unacceptable waste that could create odors
2. Removal from the site of rejected waste that could cause odor problems
3. Active management of recycled materials

2.8 Litter & Dust Control

Personnel will regularly pick up any litter that is observed. The facility has been designed to provide reasonable precautions to prevent emission of particulate matter from on-site activities such as loading, unloading, storing, and handling. The reasonable precautions include a paved entrance and parking areas, and appropriate use setbacks around the facility. If excessive airborne dust ever occurs at the site, additional measures shall be taken, which may include watering of selected debris areas that are creating the dust.

2.9 Fuels, Solvents, Lubricants

Fuels and lubricants are contained within buildings on site or approved containers with secondary containment. All fuels and lubricants are properly labeled. On-road fuel is stored

within a tank with secondary containment; off-road fuel is stored in a 500 gallon temporary tank. The fuel tank is registered with and inspected annually by Alachua County Environmental Protection Department. Grease and oil are stored within a containment area. No solvents will be stored at the facility.

2.10 Equipment Failure

Sufficient backup equipment will be available for equipment breakdowns and downtimes for routine equipment maintenance. In the case of major equipment failure, the following procedures will be followed:

1. Arrangements with contractors and rental equipment dealers will be made to furnish equipment on a short-term basis.
2. Applicable facility operations will cease until equipment capacity is retained.

Section 3 – Contingency Plans

3.1 Emergency Plans

Contact information for responsible persons and their position will be posted along with hours of operation. In the event of an accident or fire, call 911.

3.2 Personal Injury Accidents

In the event of a personal injury at the facility, the nature and extent of the injury will be assessed to the extent possible by on-site personnel and emergency first-aid techniques administered by appropriate personnel as necessary. If the injury appears to require professional medical attention, emergency assistance will be summoned. In all cases, the facility supervisor will be notified.

3.3 Fire Prevention and Extinguishment Plan

This facility shall follow the recommended fire protection criteria and practices as stated in NFPA 230, Standard for the Fire Protection (2003 Edition, Chapter 11.6 (Protection of Storage of Forest Products). In addition, the facility shall comply with any additional requirements of Alachua County Fire Rescue.

A 15'-wide cleared area / fire break shall be maintained along the northern, western, and southern boundaries of the 15-acre site. This setback shall be plowed regularly to keep mineral soil exposed. This setback is intended as a fire break and to provide access for fire protection. The setback shall be maintained and cleared of vegetation which would hinder the passage of fire fighting vehicles. Buildings, parking, or storage of any wood or wood products (processed or unprocessed vegetative matter), equipment or materials shall not be permitted within the setback area. The cleared setback and additional vegetative buffer are required to provide minimum protection against a fire extending from this property to an adjacent property.

The driveway into the site will be maintained as a properly engineered, stabilized road to support the live load of a firefighting apparatus. In addition, a 10,000 gallon above ground tank shall be located on site with supply provided via on-site well.

Both Alachua County Fire Rescue and the facility supervisor will be notified immediately in the event a fire occurs. In the event of fire at the facility or on its equipment, the following procedures will be followed by personnel:

1. Trained personnel will be notified immediately and appropriate equipment staffed.
2. Any people or equipment at risk will be removed from the area.
3. Staff will use equipment to separate burning material from stable material.
4. Two completely different types of fires can occur in piles: surface fires and internal fires. In both cases, the burning material will be extinguished with grinder and spread on-site to cool.
 - a. In the event of a surface fire, the material will be removed from the affected area and extinguished.
 - b. In the case of an internal fire in a pile, equipment will be used to break down the pile and spread it over the safe yard area to allow the fire to be extinguished in both the pile and the ground spread material.

3.4 Spills

If unauthorized hazardous waste, fuel, or oil is spilled at the site, the area will be bermed or absorbent material placed to contain the spill. The facility supervisor will be notified immediately in the event a spill occurs. During the operational hours of the facility, at least one person who is trained in the response procedures below will be on-site. In the case of spill, the following spill contingency will be implemented:

1. In the case of, or as soon as a spill is observed, the source of the spill will be located and actions taken to prevent future spillage, if possible. Personnel will stay upwind, avoiding vapors.
2. Valves, pumps, and electrical will be shut off as appropriate.
3. Potential ignition sources will be removed from and restricted from entering the area of the spill, if the material is flammable.
4. A temporary dike will be constructed to contain the spill.
5. Absorbent socks/booms will be used where appropriate. The Alachua County Fire Department and approved spill response contractor will be immediately advised of the nature and location of the spill.
6. All absorbent material or contained liquid will be removed and packaged in Florida Department of Transportation (FDOT) approved containers. Used absorbent materials should be packaged separately from liquids.
7. All containers for the disposal of spill response debris will be labeled with the type of waste, the start date of accumulation, and disposed of in accordance with Federal and State environmental regulations.
8. The facility supervisor will document all events.