



# Alachua County Development Review Committee Staff Report

**Project Number: DR23-000020**

---

## ***Revised Final Development Plan for Watson Construction and Demolition Debris Disposal Facility***

**SUBJECT:** Watson C&D Debris Disposal Facility

**DESCRIPTION:** Construction and demolition debris fill operation renewal

**AGENT/APPLICANT:** eda engineers-surveyors-planners, inc

**PROPERTY OWNER:** Countyline Landfill, LLC

**PROPERTY DESCRIPTION:**

Location: 20103 SW Archer Road  
Parcel Numbers: 05104-002-002  
Land Use: Rural/Agriculture  
Zoning: Agriculture  
Acreage: 44.5

**CHRONOLOGY:**

Special Use Permit Z22-000007 Approved: 02/28/23  
Application Submittal: 05/01/23  
Insufficiency Reports: 05/19/23; 06/22/23; 08/17/23  
Application Resubmittal: 06/05/23; 07/31/23; 10/2/23  
Sufficiency Determination: 01/31/23  
Rev. Final Development Plan Hearing: 02/15/24

**STAFF RECOMMENDATION:** **Approval with Conditions of the Revised Final Development Plan**

# Alachua County Development Review Committee Staff Report

## **DESCRIPTION OF PROPOSED PLAN:**

This is an existing operation that received a Special Use Permit (SUP) renewal by the Board of County Commissioners (BoCC) in February 2023 to continue to allow a construction and demolition landfill in the Agriculture zoning district (Special Use Permit application Z22-000007; Resolution Z-22-12 – copy of resolution provided in back-up materials). Per Unified Land Development Code (ULDC) Section 404.95 (a) *Expiration of special use permit and development plan*, approval of a Special Use Permit (SUP) and development plan for a mining or excavation and fill operation shall be valid for a maximum of five years, except for excavation, clean debris and land clearing debris operations, which shall be valid for a period specified in the Special Use Permit. This site is for construction and demolition debris, and therefore requires SUP renewal every five years.

The site is located several miles west of the City of Archer on the south side of State Road 24. Originally approved as a sand borrow pit in 1984, the Special Use Permit was then transferred to the current operator in 1987. The central 30 acres of the site that was originally permitted has been previously cleared and excavated, and no more excavation will occur.

The facility will operate in five phases. The initial phase (phase 0) entails the filling of the previously excavated area up to original ground. The other four phases involve the vertical expansion of the facility.



Aerial of the Site

# Alachua County Development Review Committee Staff Report

## **CONSISTENCY ANALYSIS:**

Following is an analysis of the consistency of the proposed plan with the applicable policies of the Comprehensive Plan and Land Development Regulations.

## **COMPREHENSIVE PLAN:**

### **FUTURE LAND USE ELEMENT**

Policy 5.1.2 of the Future Land Use Element determines that landfills are institutional uses. Policy 5.1.1 states that such institutional uses may be allowed in areas specifically designated for institutional land use, as well as in other land use categories, as provided in the Land Development Regulations.

Policy 6.1.7 of the Future Land Use Element states that clean debris and construction and demolition debris landfills may be permitted through the special use permit process in areas identified as Rural/Agriculture, subject to performance criteria in the land development regulations, including the protection of groundwater quality.

Solid Waste Element Objective 1.3 and related policies provides policies for landfill operations, including C&D operations, and provides for standards to be included in the development regulations.

The approved Special Use Permit and proposed Revised Final Development Plan is consistent with the applicable Comprehensive Plan policies.

## **UNIFIED LAND DEVELOPMENT CODE:**

### **ZONING DISTRICT AND USE REGULATIONS**

Mining, Excavation and Fill Operations are allowed in the Agriculture zoning district with a Special Use Permit. The Special Use Permit was re-approved on February 28, 2023, with 23 specific conditions related to this site.

Staff reviewed the revised final development plan for compliance with the approved conditions.

Below are the SUP conditions in *italics* followed by response of how the condition has been met in **bold**:

1. *The applicant shall comply with all federal, state, and local laws, rules,*

# Alachua County Development Review Committee Staff Report

*regulations, permits and ordinances, now and hereafter in force, which may be applicable to the use of the site. Revised Final Development Plan approval shall be required within one year of the issuance of this permit and shall include an updated groundwater monitoring plan.*

**The BoCC approved the Special Use Permit February 28, 2023. The Revised Final Development Plan was submitted May 1, 2023. The DRC hearing is scheduled for February 15, 2023. DRC approval will bring the facility into compliance with this condition.**

2. This special use permit is issued to County Line Landfill, Inc. (Larry Watson, President) to allow excavation, fill, and recycling of construction and/or demolition debris and shall expire February 28, 2028. In the event of transfer of this property or business to any other operating entity, this Special Use Permit shall terminate.

**This condition has been acknowledged by the applicant. It is operated by County Line Landfill, LLC.**

3. *A setback 100 feet in width shall be retained along the right-of-way of State Road 24. A setback 50 feet in width shall be retained along all other property lines. Stormwater basins shall be allowed in the setback area.*

**These setbacks are provided on the development plans.**

4. *A 50-foot low density buffer shall be required along State Road 24 to provide visual screening.*

**A 50-foot low density buffer is provided on the plan. Existing vegetation fulfills the requirements.**

5. *Any materials such as lubricants, hydraulic fluids, oils or other materials used in equipment maintenance shall be collected and properly disposed of and not allowed to leak onto the surface of the ground.*

**Currently, an above ground storage tank is located on the subject site – it stores diesel fuel for business equipment onsite use. Tanks are installed within what appears to be a roll-off 20-yard debris dumpster with a continuous roof system over the dumpster within a fabricated steel dyke area within the dumpster and a gas power air compressor used to dispense the diesel located in the double open-door end of the dumpster. This storage tank is currently relocated from time**

# Alachua County Development Review Committee Staff Report

to time on the site.

**This storage tank will either have to be fully mobile (mounted on a trailer) and comply with the required regulations or install a concrete pad or impervious surface for the fueling area, per Chapter 353 Hazardous Materials Management Code (HMMC) and as allowed by National Fire Prevention Association (NFPA) 1 Chapter 42.3.3.9 Florida Fire Prevention Code (FFPC) 8<sup>th</sup> Addition.**

**See Recommended Condition #1 of approval language.**

*6. Burning shall be prohibited.*

**No burning is proposed.**

*7. The waste disposal limit and sequence of fill, and closure and reclamation plan shall be in accordance with the Florida Department of Environmental Protection (FDEP) permit requirements for this site.*

**The applicant has stated that the facility is in compliance with the existing FDEP permit and a copy of the permit is included in the backup.**

*8. Hours of operation shall be daylight hours Monday through Saturday.*

**The hours of operation are indicated in the Operations Manual and the applicant has stated they are/will be complied with.**

*9. The finished slopes shall be no greater than 1:4 (rise:run), and the maximum height of fill shall not exceed 148 feet NGVD (National Geodetic Vertical Datum).*

**The development plan demonstrates that neither the finished slopes nor the maximum height are exceeded.**

*10. Excavation shall be prohibited.*

**All previous excavation activities have concluded on this property. Therefore, no excavation shall occur as part of this existing C&D disposal facility. All current and future proposed work is to dispose of materials above grade.**

*11. If groundwater or surface water monitoring results indicate a degradation of the water quality, the applicant may be required to temporarily cease filling*

# Alachua County Development Review Committee Staff Report

*operations until the source of the problem is identified, and appropriate corrective actions are completed.*

**Monitoring results do not indicate any violations of primary drinking water quality (per latest ground water monitoring report). If there are issues, then per condition 21 of the SUP the operator is required to report the issue and develop and implement an action plan in coordination with Alachua County EPD.**

*12. Prior to any disturbance of native soils in the setback areas, the applicant shall survey these areas for gopher tortoises. Should the survey reveal that gopher tortoises reside in setback areas proposed for construction activities, certification that Florida Fish and Wildlife Conservation Commission regulations have been addressed shall be provided to the Alachua County Environmental Protection Department prior to excavation or land clearing.*

**No disturbance in these areas is proposed.**

**13.** At the time of development review, the applicant shall provide an update of the following:

- a) An engineer or geologist, registered in the State of Florida, shall prepare an environmental monitoring plan. The plan shall provide for monitoring during landfill operation and for a five-year post-closure period. The plan shall include:
  - i. An inventory of all public and private potable water wells within 500 feet of the subject property boundaries.
  - ii. Monitoring and reporting of ground water quality upgradient and downgradient of the site.
  - iii. Monitoring and reporting of surface water quality on, and in the vicinity of the site, when it is present.
  - iv. Field and laboratory test parameters.
  - v. Frequency of monitoring events and location of monitoring wells and surface water stations.
  - vi. Timely submission of monitoring reports that include a one page summary/cover letter, prepared by a professional engineer or professional geologist. The summary/cover letter shall highlight and discuss any exceedances or increases over historic results. In addition, exceedances of primary drinking water standards shall be reported in writing within 48 hours to the Alachua County Environmental

# Alachua County Development Review Committee Staff Report

Protection Department.

The “environmental monitoring plan” is not one specific document. However, the required information has been provided within the Operations Plan, Water Quality Reports, as well as the Well Inventory document.

The applicant has provided County staff with an inventory of all public and private potable water wells within 500 feet of the subject property boundaries.(The inventory in included in the back-up materials.)

**Additionally, as also explained in the response to comment #11, monitoring results do not indicate any violations of primary drinking water quality (per latest ground water monitoring report).**

- b) *A site closure plan shall be developed and submitted. The plan shall include, but not be limited to, the provision of procedures for post-closure repair of subsidence on the “finished” landfill surface to prevent the contamination of the Floridan aquifer by runoff from the land surface. Specifically, filling shall occur in a contiguous manner, and upon filling of five acres of the site, a 24-inch-thick layer of soil will be placed and compacted over the fill material. The upper 6 inches of this layer shall be capable of supporting vegetation. All cover as well as revegetation for a 5-acre portion of the site shall be in place within 180 days of final receipt of waste.*

**This has been submitted as part of the Operations Plan and a closure plan is provided in the development Plan.**

- c) *A hazardous materials management plan shall be established for the purpose of outlining spill cleanup and hazardous materials disposal procedures.*

**This is within the Operations Plan – Section 3; 3.8 and Section 4 *Emergency and Contingency Plans*. However, the Operations Plan needs additional information. Staff is recommending the following condition (see condition #2) of approval: An updated operations plan will be provided by EDA with necessary updates for Alachua County – including Section 1 - Hazwaste notification and clean up procedures and Section 4 - Emergency notification to ACEPD. This should be**

# Alachua County Development Review Committee Staff Report

provided with the next submitted quarterly report.

- d) *A waste management plan for the handling of unauthorized wastes shall be established for the purpose of outlining procedures for properly managing the disposal of wastes, other than C&D (construction and/or demolition debris) materials, that are discovered.*

**This is within the Operations Plan – Section 2.5 Waste Receipt and Screening**

- e) The future use or abandonment of any well which may exist in the proposed excavation area shall be specified. The Development Review Committee may require the use of existing wells as monitoring wells. Well abandonment shall be carried out in compliance with Suwannee River Water Management District requirements.

**This has been noted by the applicant and will comply with Suwannee River Water Management District requirements.**

- f) *A copy of the applicant's current Florida Department of Environmental Protection permits, with any additional amendments.*

**This was provided with the application and is in the backup materials.**

- g) Financial assurance that the reclamation plan will be completed.

**The FDEP permit has this information and references are located with the FDEP permit materials (starts on page 10 of the FDEP permit) and the Financial Assurance Cost Estimates are provided in the back-up.**

*14. The operator shall maintain a record of the waste stream and records showing the final disposal location for these materials shall be maintained for County inspection. The following information, at a minimum, shall be compiled monthly and maintained at the operator's local office:*

- a. *tons or cubic yards of C&D debris received;*
- b. *tons or cubic yards of waste recycled by type and material*



# Alachua County Development Review Committee Staff Report

- (i.e. concrete, shingles, cardboard, wood, etc.); and*
- c. *tons or cubic yards of materials removed from the waste stream by type (i.e., Class I, Class III, hazardous waste).*

**The applicant is in compliance with this requirement.**

*15. Copies of groundwater monitoring reports or correspondence related to groundwater monitoring at this landfill which are sent to the Florida Department of Environmental Protection by the applicant shall also be provided to the Alachua County Environmental Protection Department within 15 days of transmittal to FDEP. Groundwater monitoring data shall be supplied with the report submittals in an electronic format to be determined at the time of development review.*

**Groundwater monitoring reports have been provided and are in compliance.**

*16. Recycling of allowable materials including land-clearing debris for composting and mulch, concrete/masonry products, non-treated wood, plastic, metal and cardboard will be allowed to the extent that it is not inconsistent with current provisions of the accepted materials and disposal methods approved in this special use permit.*

**This has been acknowledged.**

17. *The operator shall be responsible for providing an annual report to the Alachua County Growth Management Department by November 15<sup>th</sup> of each year, to cover the period from October 1<sup>st</sup> to September 30<sup>th</sup>. The report shall include the following information:*
  - a. *An updated site plan showing location and acreage of:*
    1. *areas that have been excavated, filled and reclaimed;*
    2. *areas that are currently excavated and continue to be used as working areas to receive fill; and*
    3. *areas that are planned for excavation, fill or reclamation within the following year.*
  - b. *A calculation of the remaining available capacity (volume) for construction and demolition debris.*
  - c. *A monthly compilation of waste stream records.*

**The annual report has been provided.**

# Alachua County Development Review Committee Staff Report

18. *CCA (Chromated copper arsenate)-treated wood shall not be disposed, burned, or used as compost or mulch at this site. CCA wood waste and contaminated media shall be properly disposed of at a lined Class I facility.*

**The applicant stated in their response to conditions that no CCA-treated wood will be processed on-site and shall be properly disposed of off-site.**

19. *One identification sign shall be allowed at the entrance to the facility, out of the right-of-way, not to exceed 32 square feet with a maximum height of 8 feet. Additional directional signs for the facility shall be permitted provided they meet the requirements of the Unified Land Development Code (ULDC) Chapter 407, Article 3.*

**There is one existing identification sign.**

20. *Any violation of the above conditions shall be grounds for suspension or revocation of this Special Use Permit by the Alachua County Board of County Commissioners.*
21. *Any discharges or sampling/contamination data that indicates the site is above the criteria specified in Chapter 62-777, F.A.C., Groundwater Cleanup Target Levels (GWCTL) or Soil Cleanup Target Levels (STCL) shall require an environmental remediation action plan and appropriate immediate response per the criteria specified in Chapter 62-780, F.A.C., by the owner or its agent or consultant. Failure to coordinate this response with the Alachua County Environmental Protection Department and satisfactorily implement a remediation action plan within 30 days, may result in the suspension or revocation of the special use permit, under ULDC Chapter 409.*

*Monitoring Wells - If parameters are detected in monitoring wells in concentrations that are significantly above background water quality, or that are at levels above water quality standards or criteria specified in Chapter 62-520, F.A.C., the Permittee may resample the wells within 30 days after the sampling data is received to confirm the data. Should the Permittee choose not to resample, the Alachua County Environmental Protection Department will consider the water quality analysis as representative of current groundwater conditions at the facility. If the data is confirmed, or if the Permittee chooses not to resample, the Permittee shall notify the Alachua County Environmental Protection Department in writing within 14 days of this finding.*

# Alachua County Development Review Committee Staff Report

The latest quarterly reports provided indicated that the site is currently in compliance. Any discharges or sampling/contamination data that indicates the site is above the criteria specified in Chapter 62-777, F.A.C., Groundwater Cleanup Target Levels (GWCTL) or Soil Cleanup Target Levels (STCL) shall require an environmental remediation action plan and appropriate immediate response per the criteria specified in Chapter 62-780, F.A.C., by the owner or its agent or consultant.

*22. Comprehensive water quality testing shall be conducted in consultation with the Alachua County Environmental Protection Department at least quarterly with the results submitted to the Alachua County Environmental Protection Department.*

**Quarterly reports have been provided and are provided in the back-up materials.**

*23. A complete copy of any future FDEP permits to continue this use shall be provided within 15 days of approval to the Alachua County Environmental Protection Department.*

**This has been acknowledged.**

## **NATURAL AND HISTORIC RESOURCES PROTECTION**

There are no conservation areas associated with this site.

## **TREE PRESERVATION**

The trees within the required 50-foot buffer are being preserved and meet the low-density buffer requirement.

## **STORMWATER MANAGEMENT**

The proposed Revised Final Development Plan utilizes existing stormwater management facilities around the perimeter of the site.

## **STATE AND FEDERAL PERMIT**

The issuance of a state or federal permit shall not obligate the County to grant approval of any local permit and shall not be deemed to satisfy the requirements of the ULDC. As well, the issuance of this permit does not indicate that Alachua County believes that the applicant has all federal and state permits necessary prior to commencing construction.

Because §125.022, F.S. makes it hard for local governments to coordinate their

# Alachua County Development Review Committee Staff Report

permitting activities with state and federal permitting agencies, the applicant is advised that conflict with a subsequently issued state or federal permit may cause a need to apply for an amendment to this development plan approval.

Upon approval of a development plan, the applicant shall obtain all required state and federal permits prior to commencement of the development. Upon issuance of a required state or federal permit, the applicant shall furnish a copy of such permit to the applicable County department.

## **EXPIRATION DATE:**

The Revised Final Development Plan is valid until the expiration of the Special Use Permit Z22-000007 which is February 28, 2028.

## **STAFF RECOMMENDATION:**

Staff has found the proposed **Revised Final Development Plan** to be consistent with the Comprehensive Plan, requirements of the Unified Land Development Code, and approved Special Use Permit.

Staff recommends **approval with conditions** of The Revised Final Development Plan for Watson C&D Debris Disposal Facility.

## **Conditions:**

1. The diesel storage tank will either have to be fully mobile (mounted on a trailer) and comply with the required regulations or install a concrete pad or impervious surface for the fueling area, per Chapter 353 Hazardous Materials Management Code (HMMC). This needs to be addressed with the submittal of the next quarterly monitoring report.
2. An updated operations plan will be provided by EDA with necessary updates for Alachua County – including Section 1 - Hazwaste notification and clean up procedures and Section 4 - Emergency notification to ACEPD. This information shall be submitted with the next quarterly monitoring report.