

**Exhibit II**

Review Letters from:

Office of Administrative Services  
Florida Department of Health in Duval County  
Planning and Development Department  
Environmental Quality Division  
Solid Waste Division

Complete List of Substantiating Documents

Facility Vicinity Map  
Facility Process Flow Diagram



A NEW DAY.

# City of Jacksonville, Florida

*Donna Deegan, Mayor*

Office of Administrative Services  
214 N. Hogan Street, 5<sup>th</sup> Floor  
Jacksonville, FL 32202  
(904) 255-8406  
[www.jacksonville.gov](http://www.jacksonville.gov)

February 25, 2026

The Honorable Kevin Carrico  
City Council President  
and Members of the City Council  
117 West Duval Street, Suite 425  
Jacksonville, Florida 32202

**RE:** Modification/Renewal Application for Certificate of Public Convenience and Necessity  
GFL Solid Waste Southeast, LLC  
GFL Jacksonville Construction and Demolition Debris Transfer Station  
11011 Blasius Road  
Jacksonville, Florida 32226

Dear Council President Carrico and City Council Members:

In accordance with the provisions of Section 380.105 (d) and Section 380.112 of the City of Jacksonville Ordinance Code, the Office of Administrative Services hereby provides its' comments and recommendations regarding the above-referenced modification/renewal application as follows:

**Section 380.105 (d) (1)** – *Quantity of solid waste in the City requiring management or disposal:*

The quantity of construction and demolition debris (C&DD) generated in Duval County is estimated at 1,442,418 tons per year (not including asphalt). In addition, the amount of asphalt debris currently generated in Duval County is estimated at 605,095 tons per year. The quantity of yard trash generated in Duval County is estimated at 270,962 tons per year.

**Section 380.105 (d) (2) – Capacity of the existing facilities and the capacity of the proposed operation:**

The GFL Jacksonville Construction and Demolition Debris Transfer Station proposes to accept up to 1,000 tons of construction and demolition debris and yard trash per operating day. Listed below are the facilities that hold a Certificate of Public Convenience and Necessity within Duval County to recycle and/or landfill construction and demolition debris and/or yard trash:

<b>Facility Capacity</b>	<b>Operation</b>
AAction Recycling 1,200 tons per day	Clean Debris Recycling Facility
ACC Florida, LLC 5,000 tons per day	Clean Debris Recycling Facility
ELEV8 Recycling, LLC 1,000 tons per day	Clean Debris Recycling Facility
GFL Jacksonville C&DD Transfer Station Facility 1,000 tons per day	C&DD & Yard Trash Transfer Station and Clean Debris Recycling (including yard trash)
Custom Concrete, Inc. 910 tons per day	Clean Debris Recycling Facility
Duval Asphalt Products, Inc. 12 <sup>th</sup> Street Location 825 tons per day (550 of which is clean debris)	C&DD Recycling Facility (clean debris & asphalt shingles)
Duval Asphalt Products, Inc. Philips Highway Location 550 tons per day	Clean Debris Recycling Facility
Greenland Biomass, LLC 3,000 tons per day	Clean Debris & Yard Trash Recycling Facility
Hrustic Brothers, Inc. Edgewood Avenue Location 1,200 tons per day	Clean Debris Recycling Facility

Hrustic Brothers, Inc. Fayal Drive Location 1,200 tons per day	Clean Debris Recycling Facility
Whitehouse Recycling 2,000 tons per day	C&DD Recycling Facility (including yard trash)
Jones Road C&DD Disposal Facility 3,000 tons per day	C&DD Disposal/Recycling Facility (including yard trash)
Masters Road, LLC 1,500 tons per day	Clean Debris Recycling Facility
Mulliniks Recycling, Inc. 1,500 tons per day	Clean Debris Recycling Facility
Old Kings Road C&DD Disposal Facility 3,000 tons per day	C&DD Disposal/Recycling Facility (including yard trash)
Otis Road Landfill, LLC 2,000 tons per day	Class III Landfill/Recycling Facility
Outdoor Depot, Inc. 1,000 tons of clean debris per day 275 tons of yard trash per day	Clean Debris & Yard Trash Recycling Facility
Realco Recycling Co., Inc. 1,400 tons per day (1,000 of which is reserved for clean debris)	C&DD Recycling Facility
Trail Ridge Landfill 5,000 tons per day	Class I Landfill
United Brothers, Inc. 250 tons per day	Clean Debris Recycling Facility
Shaw's Land Clearing, LLC 675 tons per day	Yard Trash Recycling Facility
Sunshine Organics & Composting, LLC 200 tons per day	Composting & Yard Trash Recycling Facility

Gaston Tree Debris Recycling, LLC  
300 tons per day

Yard Trash Recycling Facility

Jacksonville Transfer Station  
600 tons per day

Class I & Class III Transfer Station

**Section 380.105 (d) (3) – Availability of alternate methods of management or disposal:**

Alternate methods of disposal and/or processing are available within the county for these waste streams. Depending on the type of construction and demolition material, it is typically disposed or processed in one of the following manners: landfilled, concrete/block can be processed into mid-size pieces for use as rip rap, processed into small pieces for use in roadways or parking areas or utilized on construction projects for various structural and drainage considerations, metal can be separated and sent to metal recyclers. Yard trash and clean wood is typically disposed or processed in one of the following manners: landfilled, processed into mulch for landscaping purposes or size reduced for use as boiler fuel or landfill cover material.

**Section 380.105 (d) (4) – Potential sites best suited to serve the City:**

The GFL Jacksonville Construction and Demolition Debris Transfer Station is located just northeast of Interstate 295 on Blasius Road in the northeast portion of the City. The location of this Facility is well suited to serve the northern portions of Duval County.

**Section 380.105 (d) (5) – Availability of regional facilities that are operating, or are projected within five years to be constructed and operating, that do or will accept the type and quantity of waste to be disposed or managed by the proposed facility:**

The facilities that currently have a certificate to landfill or otherwise process these waste streams are listed in a previous section of this letter report. No other facilities are known to be planned for Duval County at this time.

**Section 380.105 (d) (6) – Whether the waste to be disposed or managed is generated within Duval County:**

The majority of the waste delivered to this facility is expected to be generated in Duval County.

**Section 380.105 (d) (7) – The current rate of waste generation and the projected generation rate in Duval County over the next five years:**

The average rate of waste generated in Duval County for the Construction and Demolition Debris waste stream over the past 5 years has been estimated at 1,240,000 tons per year (not including asphalt). As listed in an earlier section of this report, it is estimated that 1,442,418 tons of this waste stream is currently generated annually in Duval County. In addition, it is estimated that 605,095 tons of asphalt debris is currently generated annually in Duval County.

The average rate of waste generated in Duval County for the yard trash waste stream over the past 5 years has been estimated at 290,000 tons per year. As listed in an earlier section of this report, it is estimated that 270,962 tons of this waste stream is currently generated annually in Duval County.

The projected generation rate of this waste stream over the next five years is anticipated to remain steady but may change depending on economic conditions or natural disasters in the area over this time period.

**Section 380.112 (a)**

Attached are agency responses from the Solid Waste Division, the Environmental Quality Division, the Planning and Department and the Florida Department of Health in Duval County. All reviewing agencies have recommended that the renewal and modification application be approved.

**Section 380.112 (d)**

This site has not had any payable citations related to its CON and is in compliance.

**Section 380.112 (f)**

Based on an on-line review of the Duval County Tax Collector's website, the applicant has no outstanding taxes or liens due to the City of Jacksonville.

**Section 380.112 (c)**

In accordance with the provisions of Section 380.112 (c) of the City of Jacksonville Ordinance Code, the above-referenced facility is proposing to modify their current CON, which is identified by City of Jacksonville Ordinance number 2015-406-E-R1. The facility has proposed a modification to their facility operations to operate as a transfer station for construction and demolition debris and yard trash (instead of a recycler) and to continue to receive and process dedicated loads of clean debris for recycling. The facility proposes to manage mixed loads of construction and demolition debris and segregated loads of yard trash received in accordance with Chapter 380.108(q), City of Jacksonville Ordinance Code. The facility proposes to continue to accept and process clean

debris for recycling in accordance with 380.108(p). Section 380.111 does not allow for a change of a CON facility type to be accomplished administratively; therefore, this modification will require Council approval.

The requested modification will also require a modification to the facility's current Florida Department of Environmental Protection (FDEP) permit, which the GFL Solid Waste Southeast, LLC will plans to complete after the CON modification is finalized. The requested modification is not contrary to any other local, state or federal regulation applicable to the facility, including the facility's current zoning. The Solid Waste Division has also incorporated the following into the Specific Conditions: language for permit consistency, current regulatory reference updates and any Environmental Quality Division suggested inclusions. No other changes have been made to the Specific Conditions and they are provided as Exhibit I.

Based upon the determination of need for this facility and the approval of the requested modification by the City Council, the Office of Administrative Services supports the issuance of the modification/renewal of the Certificate of Public Convenience and Necessity for the GFL Solid Waste Southeast, LLC – Construction and Demolition Debris and Yard Trash Transfer Station and Clean Debris Recycling Facility under the conditions specified in Exhibit I. The enacted resolution shall serve as the certificate and the resolution number shall serve as the certificate number. The effective date of this certificate modification/renewal shall be the date the resolution is signed by the Mayor or it becomes effective without her signature. This certificate shall be valid for a period of five years from the effective date. Should the applicant desire to renew the certificate, a renewal application shall be submitted to the City of Jacksonville's Solid Waste Division no later than six (6) months prior to the certificate expiration date.

If there are any questions regarding this matter, please contact me at your convenience.

Sincerely,



Richard Reichard  
Manager of the Office of Administrative Services

Attachments

cc: Will Williams, M.B.A., Solid Waste Division  
Eric B. Fuller, Solid Waste Division  
Cletus Kuhn, Solid Waste Division



**Mission:**

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



**Ron DeSantis**  
Governor

**Joseph A. Ladapo, MD, PhD**  
State Surgeon General

**Vision:** To be the Healthiest State in the Nation

September 5, 2025

Mr. Cletus Kuhn  
City of Jacksonville  
Solid Waste Division  
1031 Superior Street  
Jacksonville, FL 32254

**RE: Renewal Application for Certificate of Public Convenience and Necessity  
GFL Solid Waste Southeast LLC  
11011 Blasius Road  
Jacksonville, FL 32226**

Dear Mr. Kuhn:

In accordance with Chapter 380.105, City Ordinance Code, the Florida Department of Health in Duval County, Environmental Health and Safety Division, hereby forwards its comments regarding the above referenced application.

According to the above-mentioned CON application for **11011 Blasius Road, Jacksonville, Florida 32226**, the facility utilizes Limited Use Commercial Well Water for potable water (FDOH permit #16-57-1351715) and utilizes an Onsite Sewage Treatment and Disposal System (OSTDS) for wastewater (FDOH permit #16-QJ-1354935).

Based on the above information, the Florida Department of Health in Duval County offers no objection to this Application for Certificate of Public Convenience and Necessity.

If you have any questions concerning this letter, please contact me at (904) 253-2422.

Sincerely,

A handwritten signature in black ink, appearing to read "S Turner".

Scott Turner, MPA, RS  
Environmental Administrator

**Florida Department of Health in Duval County**  
**Division of Environmental Health and Safety**  
921 N. Davis Street • Bldg. B, Suite 350 (MC-45)  
Jacksonville, FL 32209  
PHONE: 904-253-1280 • FAX: 904-253-2390  
**FloridaHealth.gov**

The logo for the Accredited Health Department Public Health Accreditation Board (PHAB), consisting of the letters "PHAB" in a stylized font.  
**Accredited Health Department**  
Public Health Accreditation Board



# City of Jacksonville, Florida

*Donna Deegan, Mayor*

Planning Department  
214 North Hogan Street, Suite 300  
Jacksonville, FL 32202  
(904) 630-CITY  
www.jacksonville.gov

## MEMORANDUM

**TO:** Eric B. Fuller, Landfill Environmental Manager  
Office of Administrative Services, Solid Waste Division

**FROM:** Erin Abney, Chief of Current Planning, on behalf of:  
Helena A. Parola, Interim Director, Planning Department *SA*

**RE:** Renewal Application for Certificate of Public Convenience and Necessity (CON) with Major Modification  
Coastal Recycling Services, LLC  
GFL Solid Waste Southeast, LLC  
11011 Blasius Road  
Jacksonville, FL 32226

**DATE:** June 3, 2025

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In accordance with the provisions of Section 380.105, Ordinance Code, the Planning Department hereby forward its comments and recommendations regarding the above referenced application:

*(1) Compliance with the Zoning Code.*

The 15.25 acre subject property is located at 11011 Blasius Road within Planning District 6 and is currently zoned Industrial Heavy (IH). The underlying functional land use category is Heavy Industrial (HI). The site and the surrounding area were designated as Industrial Sanctuary by Ordinance 2007-398-E.

The applicant is seeking renewal of Certificate of Public Convenience and Necessity (CON) for construction and demolition debris recycling facility. The applicant is also proposing a Major Modification to the CON which will allow the site to be a transfer station for construction debris. The Industrial Heavy Zoning District allows this by right as long as the site does not include the transfer of Hazardous Waste. The subject site if not authorized to receive Hazardous Waste and thus meets the IH use regulations. The existing use is allowed in the IH Zoning District as a permissible use pursuant to Sec. 656.323(A)(III)(a)(14) "Recycling facilities and yards meeting the performance standards and development criteria set forth in Part 4." Construction and demolition recycling facility is also listed as a permitted use in accordance with Section 656.399.44(a)(9) of the Industrial Sanctuary Overlay Zone.

The continued use can reasonably be anticipated to comply with the Zoning Code.

*(2) The impact of the proposed facility on surrounding and nearby land uses including those impacts caused by the anticipated traffic patterns associated therewith.*

The subject property is located at the southern terminus of Blasius Road between the Alta Road/I-295 intersection and the New Berlin Road/I-295 intersection, and with immediate access from Blasius Road to either Faye Road or New Berlin Road. Blasius Road is a local road serving the surrounding industrial area with traffic impacts limited by the small area served.

The site is bordered to the north by undeveloped wetland, to the east by a CSX Transportation rail spur, to the south by a warehouse and shipping terminal and by undeveloped industrial property, and to the west by a construction equipment rental and service facility. The subject site is surrounded by undeveloped land and industrial uses. Excessive impacts from the continued operation of the facility are not expected.

*(3) The consistency of the proposed facility with any duly adopted Comprehensive Plan and all land use regulations related thereto.*

The subject property is located in the Heavy Industrial (HI) land use category. A construction and demolition recycling facility, and transfer station located in this functional land use category is consistent with the Future Land Use Element (FLUE) of the City's 2045 Comprehensive Plan. This property is also located within the Industrial Sanctuary per Ordinance 2007-398-E.

*(4) Whether the entity submitting an application is currently a registered business in the City and has a current Certificate of Use for the proposed facility operations.*

The facility operates under a current Certificate of Use (COU) granted to "Coastal Disposal and Recycling, LLC" and under the address as identified in this application; 11011 Blasius Road. COU# 4693.0

*(5) Such other considerations as he/she deems relevant.*

The Planning Department Director and the Current Planning Division Chief have identified no additional concerns.

Based on the proceeding, it is the recommendation of the Planning Department that the renewal application for the "Certificate of Public Convenience and Necessity" for Coastal Recycling Services be **APPROVED**.

If there are any questions regarding this matter, please contact me at your convenience.

## Kuhn, Cletus - ASSW

---

**From:** Corrigan, Connor - PDCU  
**Sent:** Thursday, February 12, 2026 1:31 PM  
**To:** Kuhn, Cletus - ASSW  
**Subject:** RE: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Good Afternoon Cletus,

The hours of operation change does not affect our letter. I apologize for missing the previous emails.

Thank You,

**Connor Corrigan**

*City Planner Supervisor- Current Planning Division*  
City of Jacksonville – Planning Department  
214 North Hogan Street, Suite 300  
Jacksonville, FL 32202  
(904) 255-7844



**A New Day.**

**From:** Kuhn, Cletus - ASSW <KCletus@coj.net>  
**Sent:** Thursday, February 12, 2026 1:28 PM  
**To:** Corrigan, Connor - PDCU <CCorrigan@coj.net>  
**Subject:** FW: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Connor,

The applicant has inquired about the status of their application, we are awaiting your response to the email below before moving this on to the Manager and then to Council.

Please contact me if you have any questions.

Thank you,

Cletus Kuhn  
Solid Waste Division

**From:** Kuhn, Cletus - ASSW  
**Sent:** Friday, January 16, 2026 9:20 AM  
**To:** Corrigan, Connor - PDCU <CCorrigan@coj.net>  
**Subject:** FW: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Connor,

Have you had a chance to look at this yet? Please see my email below.

Thanks,

Cletus Kuhn  
Solid Waste Division

**From:** Kuhn, Cletus - ASSW  
**Sent:** Monday, December 29, 2025 11:15 AM  
**To:** Corrigan, Connor - PDCU <[CCorrigan@coj.net](mailto:CCorrigan@coj.net)>  
**Subject:** RE: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Connor,

Please be advised that the applicant for this CON application is now requesting to modify their current hours of operation. Please see their last two responses addressing their proposed hours of operation. This request was made after you had completed your review and submitted your approval memo. Would these proposed changes to the hours of operation have an effect on your approval memo for this application (attached)?

Please contact me if you have any questions or need further information.

Thank you,

Cletus Kuhn  
Solid Waste Division

**From:** Corrigan, Connor - PDCU <[CCorrigan@coj.net](mailto:CCorrigan@coj.net)>  
**Sent:** Tuesday, June 3, 2025 2:50 PM  
**To:** Kuhn, Cletus - ASSW <[KCletus@coj.net](mailto:KCletus@coj.net)>  
**Subject:** RE: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Here is the signed letter.

Thank You,

**Connor Corrigan**

*City Planner Supervisor- Current Planning Division*  
City of Jacksonville – Planning Department  
214 North Hogan Street, Suite 300  
Jacksonville, FL 32202  
(904) 255-7844



**A New Day.**

**From:** Kuhn, Cletus - ASSW <[KCletus@coj.net](mailto:KCletus@coj.net)>  
**Sent:** Tuesday, June 3, 2025 10:19 AM  
**To:** Corrigan, Connor - PDCU <[CCorrigan@coj.net](mailto:CCorrigan@coj.net)>  
**Subject:** RE: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Great!  
Thanks for the update!

Cletus Kuhn  
Solid Waste Division

**From:** Corrigan, Connor - PDCU <[CCorrigan@coj.net](mailto:CCorrigan@coj.net)>  
**Sent:** Tuesday, June 3, 2025 10:18 AM  
**To:** Kuhn, Cletus - ASSW <[KCletus@coj.net](mailto:KCletus@coj.net)>  
**Subject:** RE: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Good Morning,

Thank you for the clarification. Both CON's are on Erin's desk for review and sign off. She told me she will have them back to me by the end of the day at the latest. As soon as I receive them I will forward them over to you.

Thank You,

**Connor Corrigan**

*City Planner Supervisor- Current Planning Division*  
City of Jacksonville – Planning Department  
214 North Hogan Street, Suite 300  
Jacksonville, FL 32202  
(904) 255-7844



**A New Day.**

**From:** Kuhn, Cletus - ASSW <[KCletus@coj.net](mailto:KCletus@coj.net)>  
**Sent:** Tuesday, June 3, 2025 9:14 AM  
**To:** Corrigan, Connor - PDCU <[CCorrigan@coj.net](mailto:CCorrigan@coj.net)>  
**Subject:** RE: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Connor,

They are only authorized to receive construction and demolition debris and yard trash. They are not proposing any changes to their authorized waste types. They are not authorized to receive hazardous waste.

Let me know if you any further questions.

Thanks,

Cletus Kuhn  
Solid Waste Division

**From:** Corrigan, Connor - PDCU <[CCorrigan@coj.net](mailto:CCorrigan@coj.net)>  
**Sent:** Monday, June 2, 2025 4:35 PM  
**To:** Kuhn, Cletus - ASSW <[KCletus@coj.net](mailto:KCletus@coj.net)>  
**Subject:** RE: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Good Afternoon Cletus,

Quick conformation on this one. Does the transfer station involve just construction material and no hazardous waste? If hazardous waste is involved then a zoning exception is required.

If it is just general construction waste being transferred, I should be able to have the letter sent over to you by noon tomorrow. Helena is out for a couple of weeks, but I have confirmed with our Chief here in Current Planning that she can sign off on the letters.

Thank You,

**Connor Corrigan**

*City Planner Supervisor- Current Planning Division*  
City of Jacksonville – Planning Department  
214 North Hogan Street, Suite 300  
Jacksonville, FL 32202  
(904) 255-7844



**A New Day.**

**From:** Kuhn, Cletus - ASSW <[KCletus@coj.net](mailto:KCletus@coj.net)>  
**Sent:** Monday, June 2, 2025 9:25 AM  
**To:** Corrigan, Connor - PDCU <[CCorrigan@coj.net](mailto:CCorrigan@coj.net)>  
**Subject:** FW: CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Connor,

Can you please provide an updated on the status of your review of the modification/renewal application for the Coastal Recycling Services C&DD Transfer Station Facility?

Thank you,

Cletus Kuhn  
Solid Waste Division

**From:** Kuhn, Cletus - PWSW  
**Sent:** Tuesday, March 11, 2025 12:17 PM

**To:** Hubsch, Charles - EREQ <[CHUBSCH@coj.net](mailto:CHUBSCH@coj.net)>; Corrigan, Connor - PDCU <[CCorrigan@coj.net](mailto:CCorrigan@coj.net)>  
**Cc:** Fuller, Eric - PWSW <[EFuller@coj.net](mailto:EFuller@coj.net)>; McIntire, Nancy - PWSW <[NMcintire@coj.net](mailto:NMcintire@coj.net)>  
**Subject:** CON Modification/Renewal Application - Coastal Recycling Services C&DD Recycling Facility

Gentlemen,

Attached is a copy of the above-referenced Certificate of Public Convenience and Necessity ("CON") modification/renewal application for your review. In accordance with Chapter 380.112, City Ordinance Code, please provide comments and recommendations within 30 days.

Page 3, Section H, of the application describes the requested modification of modifying the facility designation from C&DD Recycling Facility to Transfer Station (C&DD and Yard Trash). Please review all aspects of the application as you would for an initial application.

In order to further expedite the process, you may fax your comments to my attention at 255-7600, I can pick up responses at your office, or you may email your comments to me.

Please contact me if you have any questions.

Thank you,

**Cletus Kuhn**

*Solid Waste Environmental Specialist*  
City of Jacksonville | Solid Waste Division  
1031 Superior Street  
Jacksonville, FL 32254  
Phone: (904)-255-7521  
Fax: (904)-255-7601  
Email: [kletus@coj.net](mailto:kletus@coj.net)  
[jacksonville.gov](http://jacksonville.gov)



# City of Jacksonville, Florida

*Donna Degan, Mayor*

Office of Administrative Services  
Environmental Quality Division  
214 N. Hogan St., 5<sup>th</sup> Floor  
Jacksonville, FL 32202  
(904) 255-7100  
www.Jacksonville.gov

A NEW DAY.

November 19, 2025

## MEMORANDUM

**TO:** Richard Reichard, Director  
Office of Administrative Services

**FROM:** Melissa M. Long, P.E., Chief *p.p. Terry Carr*  
Environmental Quality Division

**SUBJECT:** Application for Certificate of Public Convenience and Necessity  
GFL Solid Waste Southeast, LLC Jacksonville  
Construction and Demolition Debris Transfer Station  
11011 Blasius Road (RE# 109084-0302)

The Environmental Quality Division (EQD) has reviewed the additional information received on October 31, 2025, for the subject GFL Solid Waste Southeast, LLC Jacksonville Construction and Demolition Transfer Station Application for Certificate of Public Convenience and Necessity. This additional information was submitted in response to the August 29, 2025, EQD comment memorandum. The EQD review was conducted in accordance with the requirements of 380.105(a) and (e), City of Jacksonville Ordinance Code. EQD offers the following comments:

1. Asbestos  
The additional information submitted by the applicant (on August 1, 2025) is complete. EQD does not have any other questions or comments.
2. Fuel Storage Tank Regulations  
The additional information submitted by the applicant (on August 1, 2025) is complete. EQD does not have any other questions or comments.
3. Well Setback Requirements  
The additional information submitted by the applicant (on August 1, 2025) is complete. EQD does not have any other questions or comments.
4. Jacksonville Emergency Management Plan Requirements  
The additional information submitted by the applicant (on August 1, 2025) is complete. EQD does not have any other questions or comments.

Richard Reichard, Director  
Office of Administrative Services  
November 18, 2025  
Page 2

5. Potable Water Service and Wastewater Disposal Service

The additional information submitted by the applicant (on August 31, 2025) is complete. EQD does not have any other questions or comments.

EQD has determined that the applicant has provided all information needed to complete its review, and the application provides reasonable assurance that the proposed project will comply with the state and local environmental regulations that are under its jurisdiction.

EQD staff requests that the Solid Waste Division send us the draft conditions for the next certificate of public convenience and necessity.

If you need additional information, please contact Charles Hubsch of EQD, at telephone number (904) 255-7217.

**Kuhn, Cletus - ASSW**

---

**From:** Hubsch, Charles - ASEQ  
**Sent:** Friday, January 16, 2026 3:55 PM  
**To:** Kuhn, Cletus - ASSW  
**Cc:** Fuller, Eric - ASSW  
**Subject:** FW: Emailing: \_\_\_CON\_GFL Solid Waste\_11011 Blasius Rd\_EQD to SWD\_ November 2025  
**Attachments:** Coastal\_Draft Specific Conditions\_1.docx

Good afternoon, Cletus. The only change that I recommend is to Specific Condition 23: Sediment and Erosion Control. In the first sentence, please change the specific references to the Department of Public Works, Development Services Division, Land Development Procedures Manual, January 2026 edition (and subsequent updates), Volume 2 Design Guidelines, Section 3.9 Erosion and Sediment Control.

Thank you,

Charles Hubsch  
Environmental Engineer/Scientist  
City of Jacksonville | Environmental Quality Division  
214 N. Hogan Street, 5th Floor  
Jacksonville, FL 32202  
Office: 904-255-7217  
Email: [chubsch@coj.net](mailto:chubsch@coj.net)  
[www.jacksonville.gov](http://www.jacksonville.gov)

A NEW DAY.

-----Original Message-----

**From:** Kuhn, Cletus - ASSW <[KCletus@coj.net](mailto:KCletus@coj.net)>  
**Sent:** Friday, January 16, 2026 9:23 AM  
**To:** Hubsch, Charles - ASEQ <[CHUBSCH@coj.net](mailto:CHUBSCH@coj.net)>  
**Subject:** FW: Emailing: \_\_\_CON\_GFL Solid Waste\_11011 Blasius Rd\_EQD to SWD\_ November 2025

Charles,

Have you had a chance to review these draft conditions yet?

Thanks,

Cletus Kuhn  
Solid Waste Division

-----Original Message-----

**From:** Kuhn, Cletus - ASSW  
**Sent:** Monday, December 29, 2025 11:25 AM  
**To:** Hubsch, Charles - ASEQ <[CHUBSCH@coj.net](mailto:CHUBSCH@coj.net)>  
**Subject:** FW: Emailing: \_\_\_CON\_GFL Solid Waste\_11011 Blasius Rd\_EQD to SWD\_ November 2025

Charles,

I noticed that I had not updated specific condition 11 with the applicant's requested modification of their hours of operation in the previous draft specific conditions. The attached has been revised to include these requested changes. I wanted to ensure that you the most recent draft conditions for your review.

Let me know if you have any questions.

Thank you,

Cletus Kuhn  
Solid Waste Division

-----Original Message-----

From: Kuhn, Cletus - ASSW  
Sent: Monday, December 22, 2025 10:04 AM  
To: Hubsch, Charles - ASEQ <CHUBSCH@coj.net>  
Subject: RE: Emailing: \_\_\_CON\_GFL Solid Waste\_11011 Blasius Rd\_EQD to SWD\_ November 2025

Charles,

As requested, please see the attached draft specific conditions for your review and comment. Please provide comments or an email confirming no comments within 5 business days.

Please contact me if you have any questions.

Thank you,

Cletus Kuhn  
Solid Waste Environmental Specialist  
City of Jacksonville | Solid Waste Division  
1031 Superior Street  
Jacksonville, FL 32254  
Phone: (904)-255-7521  
Fax: (904)-255-7601  
Email: kcletus@coj.net  
jacksonville.gov

-----Original Message-----

From: Hubsch, Charles - ASEQ <CHUBSCH@coj.net>  
Sent: Wednesday, November 19, 2025 3:52 PM  
To: Kuhn, Cletus - ASSW <KCletus@coj.net>; Fuller, Eric - ASSW <EFuller@coj.net>  
Cc: Hubsch, Charles - ASEQ <CHUBSCH@coj.net>  
Subject: Emailing: \_\_\_CON\_GFL Solid Waste\_11011 Blasius Rd\_EQD to SWD\_ November 2025

Good afternoon, Eric and Cletus. Please see the attached file, Environmental Quality Division comments regarding the subject application. Please contact me if you need additional information.

Thank you,

Charles Hubsch  
Environmental Engineer/Scientist  
City of Jacksonville | Environmental Quality Division

214 N. Hogan Street, 5th Floor  
Jacksonville, FL 32202  
Office: 904-255-7217  
Email: [chubsch@coj.net](mailto:chubsch@coj.net)  
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A NEW DAY.



# City of Jacksonville, Florida

*Donna Deegan, Mayor*

Office of Administrative Services  
Solid Waste Division  
1031 Superior Street  
Jacksonville, FL 32254  
(904) 255-7500  
[www.jacksonville.gov](http://www.jacksonville.gov)

A NEW DAY.

**TO:** Richard Reichard, Manager  
Office of Administrative Services

**FROM:** Will Williams, M.B.A, Chief   
Solid Waste Division

Cletus Kuhn, Solid Waste Environmental Specialist   
Solid Waste Division

**DATE:** December 8, 2025

**SUBJECT:** Certificate of Public Convenience and Necessity Modification/Renewal Application  
GFL Jacksonville Construction and Demolition Debris Transfer Station  
11011 Blasius Road  
Jacksonville, Florida 32226

The GFL Jacksonville Construction and Demolition Debris Transfer Station is located just northeast of Interstate 295 on Blasius Road in the northeast portion of the City. The facility lies within a Heavy Industrial land use category and is currently zoned Industrial Heavy. GFL Solid Waste Southeast, LLC proposes to continue to accept at the facility construction and demolition debris and yard trash; however, the facility has proposed a modification to their facility operations to be a transfer facility for construction and demolition debris and yard trash (instead of a recycler) and to continue to receive and process dedicated loads of clean debris for recycling. The facility proposes to manage mixed loads of construction and demolition debris and segregated loads of yard trash received in accordance with Chapter 380.108(q), City of Jacksonville Ordinance Code. The facility proposes to continue to accept and process clean debris for recycling in accordance with 380.108(p).

In accordance with Chapter 380.105(b), City of Jacksonville Ordinance Code, the Solid Waste Division hereby forwards its comments and recommendations regarding the above-referenced application:

- (1) *Whether the proposed method of operation will comply with the requirements of this Part and with the Florida Statutes and Florida Administrative Code.*

The GFL Jacksonville Construction and Demolition Debris Transfer Station operation as described in the modification/renewal application for a Certificate of Public Convenience and Necessity will comply with current local, state and federal rules and regulations in regard to solid waste handling, storing, processing and disposal when operated in accordance with the approved plans.

- (2) *Whether any hazard or menace to the public health would be created by the proposed use of the land involved or by the proposed method of operation.*

The GFL Jacksonville Construction and Demolition Debris Transfer Station operation, when operated according to the approved operations plan submitted as part of the renewal application, will not create any hazard or menace to the public health.

- (3) *Whether the wastes to be disposed or managed are generated within Duval County.*

Based upon the type of waste received by the facility and the location of the facility operations, the majority of the waste delivered to this facility is expected to be generated in Duval County.

- (4) *The rate at which the wastes to be disposed or managed are being generated in Duval County and the projected generation rate over the next five years.*

The average rate of waste generated in Duval County for the Construction and Demolition Debris waste stream over the past 5 years has been estimated at 1,240,000 tons per year (not including asphalt). It is estimated that 1,442,418 tons of this waste stream is currently generated annually in Duval County (not including asphalt). In addition, it is estimated that 605,095 tons of asphalt debris is currently generated annually in Duval County.

The average rate of waste generated in Duval County for the yard trash waste stream over the past 5 years has been estimated at 290,000 tons per year. It is estimated that 270,962 tons of this waste stream is currently generated annually in Duval County.

The projected generation rates of these waste streams over the next five years is anticipated to remain steady but may change depending on economic conditions or natural disasters in the area over this time period.

- (5) *The reasonably available means to reduce or eliminate the wastes requiring disposal or management.*

The GFL Jacksonville Construction and Demolition Debris Transfer Station proposes to continue to accept mixed loads of construction and demolition debris and segregated loads of yard trash for transferring and segregated loads of clean debris for processing and subsequent recycling. The facility will accept and manage mixed loads of construction and demolition debris and segregated loads of yard trash received in accordance with Chapter 380.108(q), City of Jacksonville Ordinance Code. Clean debris is typically generated by construction and demolition projects. There currently exists no reasonable available means to reduce or eliminate clean debris apart from recycling it as proposed by the facility operation. The facility shall meet the current recycling requirement for clean debris recycling facilities as provided in Ordinance Code Section 380, Part 1 which is currently 98% for clean debris recycling facilities.

Based upon review of the above-listed solid waste related items, it is the recommendation of the Solid Waste Division that the renewal and modification application for a Certificate of Public Convenience and Necessity regarding the GFL Solid Waste Southeast, LLC, 11011 Blasius Road, Construction and Demolition Debris and Yard Trash Transfer Station and Clean Debris Recycling Facility be **approved**.

cc: Eric B. Fuller, Solid Waste Division



**GFL Solid Waste Southeast, LLC  
C&DD & Yard Trash Transfer Station & Clean Debris Recycling Facility  
List of Substantiating Documents**

March 10, 2025 – Modification/Renewal Application received for the GFL Solid Waste Southeast, LLC C&DD & Yard Trash Transfer Station and Clean Debris Recycling Facility Certificate of Public Convenience and Necessity, prepared for GFL Solid Waste Southeast, LLC and submitted by Arnold Engineering Consulting, LLC.

April 30, 2025 – Memorandum to Richard Reichard, Office of Administrative Services, from Melissa Long, Environmental Quality Division, commenting and requesting additional information on the CON application.

June 3, 2025 – Memorandum to Eric Fuller, Solid Waste Division, from Helena Parola, Planning Department, recommending that the CON application be approved.

July 30, 2025 – Response to Request for Additional Information to the modification/renewal Application for the CON for GFL Solid Waste Southeast, LLC C&DD & Yard Trash Transfer Station and Clean Debris Recycling Facility, prepared by Arnold Engineering Consulting, LLC.

August 29, 2025 – Memorandum to Richard Reichard, Office of Administrative Services, from Melissa Long, Environmental Quality Division, commenting and requesting additional information on the CON application.

September 5, 2025 – Letter to Cletus Kuhn, Solid Waste Division, from Scott Turner, Florida Department of Health in Duval County, stating that the Florida Department of Health in Duval County offers no objection to the application for CON.

September 8, 2025 – Memorandum from Eric Fuller & Cletus Kuhn, Solid Waste Division, to GFL Solid Waste Southeast, LLC commenting and requesting additional information for the CON application.

July 30, 2025 – Response to Request for Additional Information to the modification/renewal Application for the CON for GFL Solid Waste Southeast, LLC C&DD & Yard Trash Transfer Station and Clean Debris Recycling Facility, prepared by Arnold Engineering Consulting, LLC.

November 19, 2025 – Memorandum to Richard Reichard, Office of Administrative Services, from Melissa Long, Environmental Quality Division, stating that EQD has determined that the CON application is now complete and provides reasonable assurance that the proposed project will comply with state and local environmental regulations under its jurisdiction.

November 20, 2025 – Memorandum from Eric Fuller & Cletus Kuhn, Solid Waste Division, to GFL Solid Waste Southeast, LLC commenting and requesting additional information for the CON application.

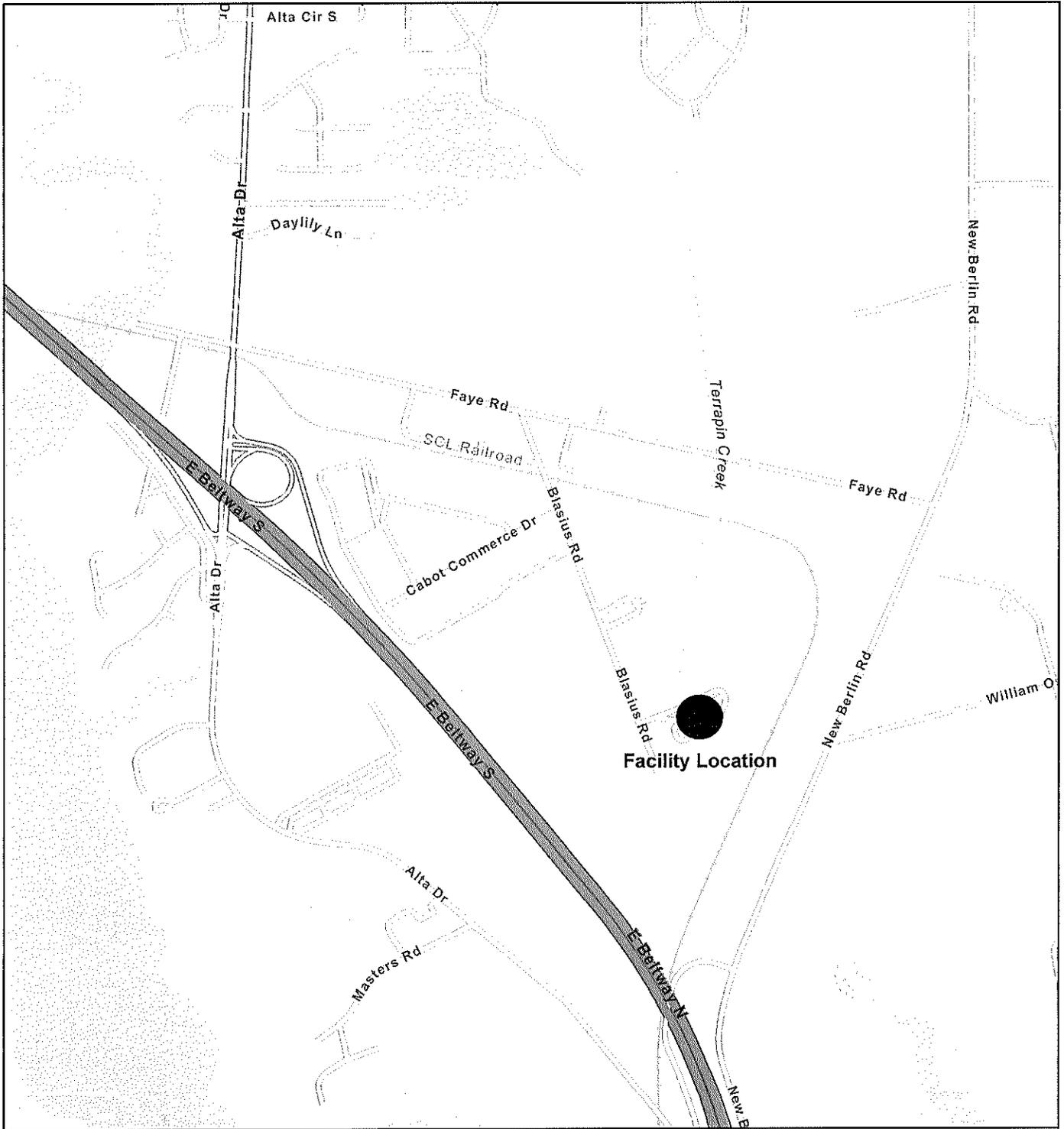
November 25, 2025 – Response to Request for Additional Information to the modification/renewal Application for the CON for GFL Solid Waste Southeast, LLC C&DD & Yard Trash Transfer Station and Clean Debris Recycling Facility, prepared by Arnold Engineering Consulting, LLC.

December 8, 2025 – Memorandum to Richard Reichard, Office of Administrative Services, from Will Williams, Solid Waste Division, recommending that the CON application be approved.

January 16, 2026 – Email to Cletus Kuhn, Solid Waste Division, from Charles Hubsch, Environmental Quality Division, stating EQD's review and comments on the Draft Specific Conditions.

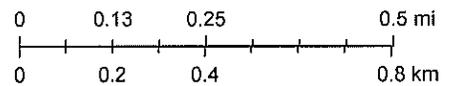
February 12, 2026 – Email to Cletus Kuhn, Solid Waste Division, from Connor Corrigan, Planning Department, stating the requested hours of operation change does not affect their approval letter.

# Duval Map



February 13, 2026

1:18,056

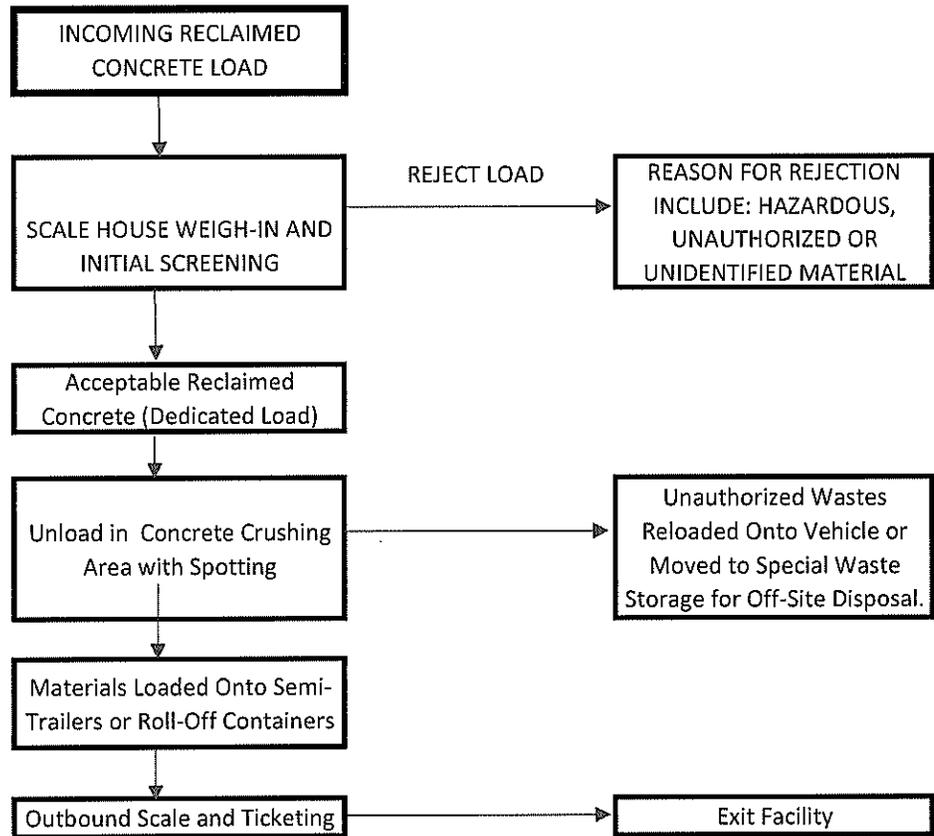


GFL Solid Waste Southeast, LLC  
GFL Jacksonville Construction & Demolition Debris Transfer Station  
11011 Blasius Road  
Jacksonville, FL 32226

Esri Community Maps Contributors, City of Jacksonville, Nassau County Property Appraiser, FDEP, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, MET/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

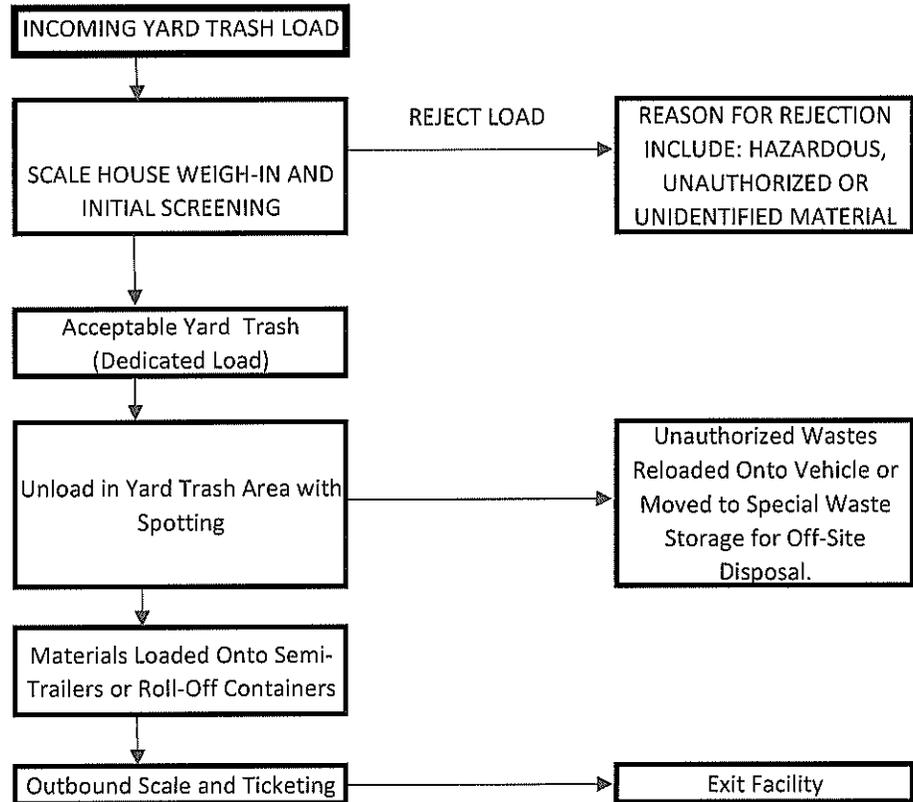
# GFL COASTAL TRANSFER STATION RECLAIMED CONCRETE PROCESS FLOW DIAGRAM

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# GFL COASTAL TRANSFER STATION YARD TRASH WASTE PROCESS FLOW DIAGRAM

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# GFL COASTAL TRANSFER STATION C&D WASTE PROCESS FLOW DIAGRAM

