

EXHIBIT I

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December 17, 2020

VIA E-MAIL

William J. Dunaway
Clark Partington
125 E. Intendencia Street
Pensacola, FL 32502
wdunaway@clarkpartington.com

Re: Longleaf C&D Disposal Facility

Dear Will:

This letter is in response to your letter dated December 7, 2020. I understand that your client seeks action on its tolled 2014 C&DD permit renewal application. However, your client's 2014 application is deficient for DRC review. The renewal application that your client submitted in 2014 was submitted in accordance with the requirements of the Solid Waste Department. Permit renewals of this nature are now considered by the Development Services Department through the DRC review process.

As I previously expressed, it is the County's position that your client needs to request formal consideration with the Development Services Department. That consideration will include review by the DRC and then a referral to the Board of County Commissioners for a public hearing on your client's renewal request. Before the County can add your client's renewal request to a DRC agenda, your client will need to address the application deficiencies.

You and I are in agreement that your client qualifies for the limited vesting provided for by Section 82-226 of the Escambia County Code of Ordinances. However, as you stated in your letter dated December 7, 2020, your client's 2014 renewal application is deficient in that it does not address several of the general operating requirements for C&DD facilities. Your client's 2014 renewal application is deficient for DRC review because it

does not address the following new items of consideration that were the product of the County's moratorium:

- Odor and Gas Monitoring System Plan (Section 82-227(1)(a))
- Stormwater Management System Plan (Section 82-227(1)(b))
- Groundwater Monitoring Plan (Section 82-227(1)(c))
- Operational Plan (Section 82-227(2)(a) & Section 82-228(2)(d))
 - Facility description
 - Procedures for handling unauthorized waste
 - Contingency plan
 - Procedures for maintaining operational records
 - Procedures for preventing pollution
 - List of reserve equipment and maintenance structure
- Boundary Survey (Section 82-227(2)(k))
- Financial Surety (Section 82-227(2)(l))
- Disposal Fill Sequence Plan (Section 82-227(2)(q))
- Training Certifications (Section 82-227(2)(s))
- Site Plan (82-228(2)(c))
- Design Drawings (Section 82-228(2)(e))
- Proof of Insurance (Section 82-233)

Although your client may have touched on some of these requirements in 2014, many of the requirements have now been revised in the Code. In order to address these deficiencies, your client will need to complete the latest Development Services Department application form and supply all requested documentation. As soon as these deficiencies are resolved and the County has received any applicable fees from your client, the County will commence review of your client's request by placing your client's project on a DRC agenda.

If you have any questions, please feel free to contact me at (850) 595-4970. Please let me know if you need assistance with further processing of your request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alison P. Rogers', with a long horizontal flourish extending to the right.

Alison P. Rogers
County Attorney

cc: Horace Jones, Director, Development Services Department