From: Kuhn, Cletus - ASSW <KCletus@coj.net>
Sent: Friday, November 13, 2026 7:34 AM
To: Fuller, Eric - ASSW <EFuller@coj.net>
Subject: FW: October 13 COJ Letter - Keystone Facility

See Keystone response email below:

Cletus Kuhn
Solid Waste Division

From: Bill Harris <wharrisco@aol.com>
Sent: Thursday, November 12, 2026 10:07 AM
To: Kuhn, Cletus - ASSW <KCletus@coj.net>
Subject: October 13 COJ Letter - Keystone Facility

Cletus - good morning.

Keystone is in receipt of your October 13 letter regarding Keystone and the city's solid waste program. I would have responded to you earlier but I have been trying to research this situation.

This e mail constitutes Keystone's formal response to your October 13 letter and demonstrates that the Agremax coal ash material temporarily stored at Keystone does not constitute a solid waste disposal or management facility or a transfer station subject to Sections 380.102 , 380.103(a), and 380.108(q), as cited in your letter. Below is my reasoning.

1. As recognized by the city's Environmental Quality Division (EQD), the Keystone Terminal is an existing bulk material handling facility under Standard Industrial Classification Number 4491 and NAICS Code Number 423520. Bulk dry material offloaded from ships or by rail includes cement, gypsum, various sizes and shapes of stone, granite, wood chips, and other bulk materials. As such, the primary purpose of the terminal is not to store or hold solid waste for transport to a processing or disposal facility as a transfer station.

2. The definitions of solid waste management facility and transfer station cited in your letter are substantially the same as the definitions for such terms adopted by the Florida Department of Environmental Protection (FDEP) in Chapter 62-701, FAC. FDEP is fully aware of all bulk material handling operations at the terminal, as is the city's EQD. FDEP has not required that any Keystone bulk material handling operation at the terminal, including the Agremax coal ash material temporary storage, be subject to any solid waste management facility or transfer station permitting under Ch. 62-701, FAC.

Accordingly, Keystone does not believe that its terminal is subject to issuance of a certificate from the city, as a solid waste disposal or management facility.

Having said all of this; I welcome an opportunity for you and I to discuss this together, on the phone or elsewhere. I don't know if you, or someone else, is making these regulatory/enforcement interpretations on behalf of the city, but I want to make sure we all get on the same sheet of music.

Thanks for your cooperation.

Bill Harris
Keystone Properties, LLC
1915 Wigmore Street
Jacksonville, Florida
404 626 2990