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

A NEW DAY.

9489 0090 0027 6575 8581 65

October 13, 2026

Via Certified mail:
Keystone Properties LLC
Keystone Investments II, LLC
1915 Wigmore Street
Jacksonville, Florida 32206

Dear Property Owner of RE: **111068 0000, 111075 0100 and 111219 0010**
1301, 1915, and 0 Wigmore Street
Jacksonville, Florida 32206

The City of Jacksonville, Solid Waste Division, has received reported information indicating that the above-referenced properties are operating in violation of Jacksonville Municipal Code Chapter 380.103(a) and 380.108(q). Specifically, reported information along with the City's investigative findings to date indicates the above-referenced properties are being utilized as a solid waste management facility transfer station for coal ash residue.

Ordinance Code

Section 380.102. - Definitions.

Solid waste management facility means any solid waste disposal area, volume reduction plant, transfer station, or other facility, the purpose of which is resource recovery or the disposal, recycling, processing or storage of solid waste. The term does not include facilities which use or ship recovered materials unless such facilities are managing solid waste.

Transfer station means a facility the primary purpose of which is to store or hold solid waste for transport to a processing or disposal facility. Operations at such facilities may include separation of incidental amounts of recyclable materials or unauthorized waste.

Section 380.103(a) - Certificate required for solid waste disposal or management facility.

(a) No person shall use property or permit property under his control or ownership to be used as a solid waste disposal or management facility without a certificate issued under this Chapter.

Section 380.108 (q). - Certificate required for solid waste disposal or management facility.

(q) Transfer stations operating in Duval County which accept waste that is required to be disposed of in a Class I facility shall only accept waste of those types that has been generated in Duval County. Waste that has been generated inside or outside of Duval County that is not required to be disposed of in a Class I facility is not restricted from delivery to a transfer station facility located in Duval County if: (1) the waste is not commingled with waste that is required to be disposed of in a Class I facility, and (2) the transfer station facility is properly permitted to receive the types of waste not required to be disposed of in a Class I facility. Waste generated outside of Duval County and received at a transfer station facility located in Duval County which has not been commingled with waste required to be disposed of in a Class I facility shall not be

directed to a Class I disposal facility owned by the City. Notwithstanding the above, any solid waste collected by municipally-contracted haulers as part of municipal collection services within Duval County shall not be restricted from bringing wastes to a transfer station or be limited to where this material is ultimately directed for disposal or recycling so long as the municipal wastes are not commingled with non-municipal wastes not required to be disposed of in a Class I facility. Municipally-contracted haulers for purposes herein are defined as the haulers contracted by the Town of Baldwin, the City of Atlantic Beach, the City of Jacksonville Beach, the City of Neptune Beach and the City of Jacksonville for municipal collection services.

Potential Violation Information

The subject properties are reportedly being utilized to store and/or transfer solid waste (coal ash residue such as fly ash, bottom ash and related materials) without a Certificate of Public Convenience and Necessity ("CON"). Further, a transfer station of solid waste materials required to be disposed of in a Class I facility is only allowed if the solid waste was generated within Duval County and upon approval from City Council. Information indicates the facility is accepting coal ash residuals from Puerto Rico, off-loading them on parcel RE # 111219 0010, and storing them on parcels RE# 111068 0000 and 111075 0100 before being taken to a landfill in Georgia for disposal.

Corrective Action

Within 30 days of receipt of this letter, please provide the Solid Waste Division with documentation sufficient to demonstrate that the activities occurring at the subject properties are not applicable to or authorized under Chapter 380, including but not limited to, as applicable, the applicable Certificate of Public Convenience and Necessity, permits, approvals, waste characterization documentation, records identifying the generator and location of generation, and documentation identifying the facility to which the material is being transported for re-use or disposal. That information may be provided to:

City of Jacksonville
Solid Waste Division
1031 Superior Street, Jacksonville, Florida, 32254
Attn: Cletus Kuhn or email: kcletus@coj.net.

If the City determines that the reported activities constitute an unauthorized solid waste management facility or transfer station, or otherwise violate Chapter 380, the City will require appropriate corrective action, which may include cessation of unauthorized receipt and storage of solid waste and removal and lawful disposal of material accumulated at the property.