April 21, 2016

CERTIFIED MAIL 7015 1730 0001 9508 9004 RETURN RECEIPT REQUESTED

Robert D. Coolidge Coolidge Trucking Systems, Inc. 829 Central Ave W Saint Paul, Minnesota 55104

Dear Mr. Coolidge:

RE: Cease and Desist Orders

On April 13, 2016, Joe Wozniak of the Environmental Health Division conducted a site visit of the vehicle storage area for Coolidge Trucking Systems, Inc. (hereinafter "Coolidge Trucking" or the "company") located at 560 Randolph Ave., Saint Paul, Minnesota. During this visit, Mr. Wozniak observed a company employee performing solid waste transfer activities for which this site is not licensed. As a result, you and Coolidge Trucking are currently in violation of the following provision of the Ramsey County Solid Waste Ordinance:

SECTION 4.00 LICENSING OF SOLID WASTE FACILITIES AND SITES

4.01 License Required. No Person shall make nor allow any land or property under their control to be used for Solid Waste Management or Disposal purposes unless such land or property has been duly Licensed pursuant to the provisions of this Ordinance.

Section 3.00 DEFININTIONS

3.91 Transfer Station: means an intermediate Solid Waste Facility in which Solid Waste collected from any source is temporarily deposited to await transportation to another Solid Waste Facility.

Facts supporting the conclusion that a violation of the Ramsey County Solid Waste Ordinance has occurred are as follows:

On April 13, 2016, Joe Wozniak conducted a site visit of the vehicle storage area for the mixed municipal solid waste (MSW) hauler licensed as Coolidge Trucking, whose vehicle storage area is located at 560 Randolph Ave., Saint Paul, MN. During this visit, Mr. Wozniak observed "Willie," a company employee, using a skid steer vehicle to move MSW from a concrete pad on the ground into a 30-cubic yard roll-off box. Mr. Wozniak spoke with Willie, who indicated that he had previously dumped a 10-yard roll-off box of MSW onto the pad, and then proceeded to load that material into the 30-yard box. Willie said he was to deliver the box to the resource recovery facility in Newport, MN. later that day. When asked how often he dumps a box on site to

Environmental Health Division 2785 White Bear Ave. North Suite 350

Maplewood, MN 55109 Phone: (651) 266-1199 Fax: (651) 266-1177 www.co.ramsey.mn.us Robert D. Coolidge, Coolidge Trucking Systems, Inc. Cease and Desist Order April 21, 2016 Page Two

transfer waste into another container, Willie stated that it occurred once or twice a week, depending on how busy the company was. Mr. Wozniak observed a second 30-yard box of MSW on site that was covered. Willie indicated that he was also going to deliver that box to Newport that day. Willie also stated that a box of construction and demolition waste was to be delivered to SKB landfill in Rosemount, Minnesota later that day.

Mr. Wozniak took photographs of the items listed above to record and illustrate his observations.

Therefore, the County hereby orders the following:

Robert D. Coolidge and Coolidge Trucking are hereby ordered to immediately cease and desist any and all solid waste transfer activity at 560 Randolph Ave., St. Paul, MN. This includes, but is not limited to, the deliberate dumping or emptying of any container of solid waste onto the ground or any surface, unless such activity is expressly licensed and/or permitted. This activity is NOT to occur at the above location or any other location within the boundaries of Ramsey County until you have obtained all required permits and/or licenses from this Department, the proposed site location municipality, (City of Saint Paul for this location), and/or the Minnesota Pollution Control Agency (MPCA).

THEREFORE, YOU ARE HEREBY GIVEN NOTICE THAT THESE VIOLATIONS HAVE BEEN RECORDED BY SAINT PAUL - RAMSEY COUNTY PUBLIC HEALTH. THIS NOTICE DOES NOT PRECLUDE THE DEPARTMENT FROM TAKING FURTHER ENFORCEMENT ACTION FOR THESE VIOLATIONS. FAILURE TO COMPLY WITH THESE ORDERS AND ANY PROVISIONS OF THE RAMSEY COUNTY SOLID WASTE ORDINANCE WILL RESULT IN THE REFERRAL OF THIS MATTER TO THE RAMSEY COUNTY ATTORNEY'S OFFICE FOR APPROPRIATE ENFORCEMENT ACTION, INCLUDING CRIMINAL PROSECUTION.

If you have any questions related to this cease and desist order or the transfer station licensing process, please contact Joe Wozniak at (651) 266-1187, or Larry Carlson at (651) 266-1180.

Signed:

Zack Hansen

Environmental Health Division Director

c: Larry Carlson, Supervisor, Solid & Hazardous Waste Compliance Joe Wozniak Solid & Hazardous Waste Compliance Program John Ristad, Assistant Ramsey County Attorney Tom Ferrara, City of St. Paul, Dept. of Safety and Inspections Scott Parr, MPCA, Solid Waste Management