

October 8, 2013

Mr. Charles Masella
Florida Department of Environmental Protection
2295 Victoria Avenue
Fort Myers, Florida 33901

Re: Interpretation of Environmental Resource Permitting Rule Change (10/01/2013)
Central County Solid Waste Disposal Complex
Re-Paving and Maintenance of Interior Roadways

Dear Mr. Masella:

The purpose of this letter is to confirm your previous determination regarding the requirement for a Solid Waste Permit modification and/or an Environmental Resource Permit modification for the re-paving of the existing interior roads at the Central County Solid Waste Disposal Complex (CCSWDC), Sarasota County, Florida. To summarize, the CCSWDC re-paving project will consist of the following activities:

- Re-surface the existing paved interior roads.
- Add an additional pavement overlay on the in-bound paved shoulder at the entrance to the CCSWDC for use as vehicle stacking.
- Widen the existing paved road, south of the Phase II landfill cell near the access ramp to the landfill cell, to provide for additional vehicle maneuverability and thereby enhancing safer ingress/egress to and from the landfill disposal area.
- As a result of the widening of the existing paved road, south of the Phase II landfill cell, extend one existing groundwater monitoring well and cut one existing groundwater monitoring well to be flush with the pavement surface (encased in a H-20 box and lid).

As shown in the attached email to you dated June 14, 2013, which summarizes our telephone conversation on that day, modifications to the CCSWDC's Solid Waste Permit and the Environmental Resource Permit (ERP) will not be required based on the work as described above. As you may be aware, the Florida Department of Environmental Protection (FDEP) ERP Rules have been revised effective October 1, 2013. Based on HDR Engineering, Inc.'s (HDR) review of the revised Rules, specifically 62-330-020 F.A.C. and 62-330-051 F.A.C. (Exempt Activities), Paragraph 4., 8.C. and D., the CCSWDC Re-Paving Project is considered to be minor roadway safety construction and maintenance. Moreover, no additional vehicle lanes are being installed and the minor pavement widening for increased safety results in approximately 0.28

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acres of additional impervious area at the CCSWDC. The CCSWDC Re-Paving Project will not be altering the permitted stormwater drainage flow directions, altering any of the stormwater ponds, cause any flooding, and/or impact the capacity of the existing stormwater conveyance and/or storage systems. Therefore, as previously discussed with you and per your review and agreement, as well as our review of the recently revised FDEP ERP Rules, HDR maintains that the ERP and Solid Waste Rules exempt the CCSWDC Re-Paving Project from having to submit a modification to the CCSWDC's existing Solid Waste and ERP Permits.

HDR requests a written confirmation from the FDEP (letter or email) that your prior determination for not having to submit a modification to the CCSWDC's existing Solid Waste and ERP Permits is still valid.

Please call me at 813-528-1846 should you or the Department have any questions or require additional information.

Sincerely,

HDR ENGINEERING, INC.



Richard A. Siemering
Florida Waste Operations Manager



Mark D. Oural, P.E.
Senior Stormwater Engineer

Attachment

cc: Jason Timmons, Sarasota County
Lois Rose, Sarasota County
Teresa Goluch, Sarasota County
Bill Krumbholz, FDEP
Jason Starr, HDR

Siemering, Richard

From: Siemering, Richard <Richard.Siemering@hdrinc.com>
Sent: Friday, June 14, 2013 9:52 AM
To: Jason Timmons
Cc: Charles.Masella@dep.state.fl.us; Lois Rose; Starr, Jason; Teresa Goluch
Subject: Sarasota Central County Solid Waste Disposal Complex - Road Re-Surfacing and Groundwater Well Extensions/Lowering

Jason-

This morning, I had a telephone conversation with Mr. Charles Masella of the FDEP-South District regarding the CCSWDC road re-paving project. Specifically, I asked Mr. Masella if a permit modification would be required for the following two issues:

1. **Partial road widening** – I stated to Mr. Masella that we intend to widen the road at the entrance of the site and within the area south of the Phase II cell. The road re-surfacing is for maintenance and the widening of these two areas increases the impervious acreage by approximately 0.28 acres. The widening at the entrance and south of the Phase II cell is primarily for site safety. Mr. Masella stated that a permit modification for the minor road widening ***is not*** required.
2. **Extension and lowering of groundwater monitoring wells** – I stated to Mr. Masella that the widening of the existing paved road adjacent and south of the Phase II cell will require that one groundwater monitoring well be extended and another cut flush with the new pavement. The well locations and depths will not change. I also stated that the cutting and flush mounting of the one well will have a concrete pad and lid which will sustain a H2O loading. Mr. Masella stated that a permit modification ***is not*** required and we can provide the FDEP with the updated top of pad and top of casing survey elevations.

Please call if you have any questions or require additional information. Thank you.

RICHARD SIEMERING

HDR Engineering, Inc.
Senior Project Manager | Solid Waste Section Manager | Professional Associate

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