



FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

SOUTH DISTRICT OFFICE
P.O. BOX 2549
FORT MYERS, FL 33902-2549

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

December 14, 2012

Lee County Solid Waste Division
c/o Laura Gray, P.E., Engineering Manager
10500 Buckingham Road, 2nd Floor
Fort Myers, Florida 33905
E-mailed to: lgray@leegov.com

Re: Lee County-SW
Alternate Procedure for Sampling Recovered Screened Material (RSM)
Lee County C&D Debris Recycling Facility, PA90-30

Dear Ms. Gray:

The Department hereby approves the proposed Alternate Procedure for Sampling Recovered Screened Material (RSM) submitted by Lee County Solid Waste Division, and received by the Department on December 7, 2012 (enclosed). The approved Alternate Procedure shall be used for **ONLY** this facility and this specific sampling event.

The proposed Alternate Procedure Sampling Procedure shall consist of the following:

1. Each sample shall consist of hourly composites from an operating day with such day to represent a minimum of four (4) operating hours.
2. Grab samples shall be collected in lieu of the composite samples for VOC analyses (Method 8260) only on each of the fourteen (14) days of sampling.
3. A total of fourteen (14) consecutive composite and grab samples (VOCs only) shall be collected for the baseline analyses specified in the Department's Guidance document entitled "Guidelines for the Management of Recovered Screened Material from C&D Debris Recycling Facilities in Florida", Revision 1 dated April 15, 2011.

Should you need further information, please call me at (239) 344-5636. Your cooperation in this matter is appreciated.

Sincerely,

Albert D. McLaurin, P.E.
Assistant Director
South District Office

Enclosure
ADM/se

Copies furnished to: Lindsey J. Sampson, Director lsampson@leegov.com
Bill Krumbholz, DEP bill.krumbholz@dep.state.fl.us
Jay Standiford, DEP james.standiford@dep.state.fl.us
Richard Tedder, DEP richard.tedder@dep.state.fl.us



LEE COUNTY
SOUTHWEST FLORIDA

BOARD OF COUNTY COMMISSIONERS

John E. Manning
District One

Brian Bigelow
District Two

Ray Judah
District Three

Tammy Hall
District Four

Frank Mann
District Five

Karen B. Hawes
County Manager

Michael D. Hunt
County Attorney

Diana M. Parker
County Hearing
Examiner

December 7, 2012

Mr. Albert McLaurin, P.E.
Assistant Director of District Management
Florida Department of Environmental Protection, South District
2295 Victoria Avenue, Suite 364
Fort Myers, FL 33901

RE: Alternative Procedure for Sampling Recovered Screen Material
Lee County C&D Debris Recycling Facility, PA90-30

Dear Mr. McLaurin:

Please consider this correspondence as revised request for approval to use alternative sampling procedures for sampling the recovered screen material (RSM) from the Lee County Solid Waste Division's C&D Debris Recycling Facility (CDDRF). The Solid Waste Division (SWD) initially requested approval for alternative procedures for RSM sampling in correspondence dated October 19, 2012. Based on subsequent discussions with the Department, the SWD hereby modifies that request as outlined below. This request for approval of alternate RSM sampling procedures was developed in accordance with the Department's 'Guidelines for the Management of Recovered Screen Material from C&D Debris Recycling Facilities in Florida', Revision No. 1, April 15, 2011.

The CDDRF's operating schedule varies with the quantity of incoming C&D debris but typically runs approximately 4 to 6 hours per day, 3 or 4 days per week. As such, the Facility is unable to collect 8-hour composite RSM samples as specified in the guidance document. Instead, the SWD proposes to collect separate RSM subsamples at 60-minute intervals over a minimum of 4 hours or a typical operating day. Composite RSM samples will be collected as outlined above until the required 14 samples are collected.

Further, the Guidelines specify the procedures for collecting the composite samples which presumably applies to all of the parameters/methods required to be analyzed. However, EPA Method 8260, Volatile Organic Compounds, requires the analyses be performed on a grab sample. Thus, the SWD proposes to collect a grab sample for the volatile organic analyses in lieu of performing this analysis on the composite samples as specified in the Department's Guidelines.

RECEIVED

DEC 07 2012

D.E.P. South District

Mr. Albert D. McLaurin

December 7, 2012

Page 2

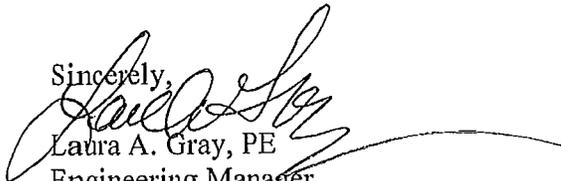
In conclusion, the SWD requests approval of the following alternative sampling procedures for the RSM generated at the County's C&D Debris Recycling Facility for the purposes of establishing baseline conditions required for the Department to issue a beneficial use determination:

1. Samples will consist of hourly composites from an operating day with such day to represent a minimum of 4 operating hours.
2. Grab samples will be collected in lieu of the composite samples for the VOC analyses (Method 8260) only on each of the 14 days of sampling.
3. A total of fourteen (14) composite and grab samples (VOCs only) will be collected for the baseline analyses specified in the guidance.

All other requirements of the Guidelines will be followed during the RSM sampling and analyses.

Thank you for considering our request. If you have any questions about the information reported above, do not hesitate to contact us.

Sincerely,



Laura A. Gray, PE
Engineering Manager
Solid Waste Division

Attachment

Cc: B. Krumbholz, DEP
J. Standiford, DEP
L. Sampson, SWD
K. Howard, SWD
J. Fournier,
File II J103