Lee County Construction & Demolition Debris Recycling Facility

Located at the
Lee County Solid Waste Energy Recovery Facility
Pursuant to Conditions of Certification
PA90-30H

10500 Buckingham Road
Fort Myers, Florida

Prepared by Applicant:
Lee County Solid Waste Division
10500 Buckingham Road
Fort Myers, FL, 33905

LEE COUNTY
SOUTHWEST FLORIDA

Submitted to the
Florida Department of Environmental Protection
South District Office and
Siting Coordination Office

RECEIVED
JUN 15 2010
D.E.P. South District

March 2010
Revised June 2010

6-15-10

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STATE OF FLORIDA
PROFESSIONAL ENGINEER

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Entered into
OCULUS
South District

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LEE COUNTY
SOUTHWEST FLORIDA
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June 15, 2010

Mr. Charles Emery III
Solid Waste Administrator
Florida Department of Environmental Protection, South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

RECEIVED
JUN 15 2010
D.E.P. South District

Re: Lee County Solid Waste Energy Recovery Facility (SWERF)
PA 90-30H
Modification to Conditions of Certification for a
Construction and Demolition Debris Recycling Facility (CDDRF)
Response to Request for Additional Information (RAI) No. 1
WACS ID No. 93715

Dear Mr. Emery:

The Lee County Solid Waste Division (SWD) has reviewed the Department's Request for Additional Information (RAI) dated April 22, 2010 pertaining to the information submitted to the Department to authorize the construction and operation of the Construction and Demolition Debris Recycling Facility (CDDRF) and provides the following response. The Department's comments are reiterated below in bold font followed by SWD's response in regular font. Note that the responses below and several of the attachments provided herein were modified in part based on discussions between Department staff and SWD representatives during meetings held on May 19, 2010 and June 3, 2010.

Please note that Specific Condition K. of Section B. I. of the modified Conditions of Certification (COC) dated March 22, 2010 specifies the submittal requirements for the Construction and Demolition Recycling Facility. An excerpt from the COC containing this Specific Condition is provided in Attachment 1 for the Department's reference. This Specific Condition requires the submittal of Form 62-701.900(4) and supporting information for all items of the Form, excluding any information previously provided to the Department. Therefore, where the RAI requests information that was not submitted in the CDDRF package but was previously submitted, or requests revisions to submitted information that was not required to be submitted but was submitted nonetheless, the response indicates the information is not required and, therefore, was not provided or was not revised.

Note that while the specific types and volumes of C&D material expected to be received as well as the types and volumes of the processed material types sorted from the incoming C & D can be projected, it would only be an estimate. The types and volumes of recyclables and

non-recyclables anticipated to be separated from the C&D and the specific storage containers or areas for each type, their locations and their capacities will change as the recyclables markets change, incoming C&D types and volumes change, and the types of materials that will be recovered change. The SWD will provide the necessary storage containers or areas in the sizes and locations needed based on the actual types and volumes of the materials received, recovered, and/or disposed. Further, the CDDRF location at the existing SWERF which includes a Recovered Materials Processing Facility, a Waste-to-Energy Facility, and a Solid Waste Transfer Station provides reasonable assurances that incoming C&D, recyclables and non-recyclables will be managed, stored, and removed in an efficient manner well within any regulatory requirements.

In addition to the above discussion, the SWD provided to the Department during the above-referenced meeting on May 19, 2010, information on the anticipated composition of the incoming C&DD and the approximate types and capacities of storage areas to be provided at the CDDRF. This information has been incorporated into this response as Addendum 1. Addendum 1 includes a table entitled 'Approximate Capacities of Storage Areas' and a second table entitled 'C &DD Composition Estimate –Type and Volume' for the Department's reference and records.

PLANS

1. Please Provide a Cover Sheet meeting F.A.C. Rule 62-701.320(7)(f)2.

Response: The Cover Sheet has been revised to provide the information required by the referenced rule. The revised Cover Sheet is provided in Attachment 2 of this response.

2. Please provide a Regional Map meeting F.A.C. 62-701.320(7)(f)3. The submitted Vicinity Map may be re-labeled to meet the needs of a Regional Map.

Response: The inset map on the SWERF Site Plan has been re-labeled to state 'Regional Map'. The revised SWERF Site Plan is provided in Attachment 3 of this response.

3. Please provide a Vicinity Map meeting F.A.C. Rule 62-701.320(7)(f)4.

Response: As indicated in the introduction, previously submitted information is not required to be submitted again. Further, the referenced rule allows for the submittal of either a Vicinity Map or a recent aerial photograph. A recent aerial photograph of the SWERF was provided in correspondence to the Department's Siting Coordination Office dated January 26, 2009 notifying the Department of a proposed amendment to the Power Plant Site Application. As the previously submitted aerial photograph can be used in lieu of a Vicinity Map, and previously submitted information is not required to be resubmitted per the above-

noted section of the Conditions of Certification, the previously provided aerial photograph satisfies the request for a Vicinity Map. Therefore, a Vicinity Map is not provided as requested by this comment.

4. Please provide a Topographic Survey of the proposed CDDRF site [F.A.C. Rule 62-701.710(2)(g)]

Response: Although a topographic survey was provided to the Department previously, a topographic map of the property which is required by the referenced rule and which contains the CDDRF site was obtained from the County's GIS system and is provided as Attachment 4 of this response.

5. Please modify the SWERF SITE PLAN using a larger scale that will allow the Site Plan to encompass the 24-inch x 36-inch sheet and allow better visibility of vehicle flow, ground water monitoring well locations, and other pertinent information [F.A.C. Rule 62-701.320(7)(f) and 62-701.710(2)(c)].

Response: The referenced SWERF Site Plan provided is of the same scale and configuration as the Site Plan previously provided to the Department's Siting Coordination Office in a submittal dated May 28, 2009 as Figure 6, Basin Delineation/Site Plan, in response to Department correspondence dated April 30, 2009. Locations of the ground water monitoring wells are included with the SWERF Ground Water Monitoring Plan. As noted above, information previously provided to the Department does not need to be resubmitted. Therefore, and because the SWERF Site Plan was provided for the Department's reference only, no revisions were made to the SWERF Site Plan in response to this comment.

6. Please provide a CDDRF Site Plan, with legend, that indicates the proposed tipping area, residue area, and storage areas that will match the volumes and surface areas discussed in the engineering report. Please eliminate the clouded areas on the plans. Show the type of surfaces proposed for the site. Indicate road locations and surface type, and connect or delete lines to clarify entrance details [F.A.C. Rule 62-701.320(7)(f) and 62-701.710(2)(c)].

Response: The CDDRF Site Plan was revised to show the approximate location and areas of the proposed tipping area, residue area, and storage areas to match the volumes and surface areas discussed in the engineering report. The CDDRF Site Plan was also revised to eliminate the clouded areas and to delineate the approximate boundaries of the areas previously depicted by the clouded areas. However, and as indicated above, because the referenced areas will likely change as the recyclables market conditions change, the volumes and types of incoming C&D material change, and as the specific materials that will be

recycled change, the specific volumes and surface areas for each of the referenced areas are not provided on the CDDRF Site Plan as requested. However, as indicated above, Addendum 1 to this response provides information submitted to the Department during the meeting held on May 19, 2010 pertaining to the anticipated volumes and types of incoming C&D material and the anticipated storage types and capacities that may be provided at the CDDRF as needed. Further, the CDDRF Site Plan has been revised to show the surface types, e.g., concrete pavement or rock or shell stabilized surface. The entrance detail has been clarified as requested. The revised CDDRF Site Plan is provided in Attachment 5 to this response.

7. **Please provide a Site Plan that provides clarity for the C&DD material recycling facility being proposed. Identify the specific storage locations and capacities for recyclable materials and non-recyclables, with further separation to processible and non-processible materials, to be sorted from the C&DD material. Identify whether the processed material areas will contain roll offs and/or bulk storage of recycled material on the ground surface. Indicate where unauthorized wastes will be placed. Indicate how residue material is handled and deposited (roll off containers and/or on the ground). Please provide dimensions for the size of the proposed residue storage area [F.A.C. Rule 62-701.320(7)(f)5 and 62-701.710(2)(b)].**

Response: The CDDRF Site Plan provided shows with clarity the CDDRF being proposed and it identifies the approximate locations where recyclable and non-recyclables will be temporarily stored. However, because the actual types and volumes of recyclables and non-recyclables are unknown at this time and will likely change as indicated above, definitive storage types, locations and capacities for these materials are not shown on the CDDRF Site Plan. Refer to Addendum 1 of this response for more detailed information on the proposed types and sizes of storage facilities that may be provided at the CDDRF. Note that the distinction of non-recyclables as either processible or non-processible has been removed from the submitted documents. Finally, the CDDRF Site Plan provided already showed the location where unauthorized wastes will be placed. However, as indicated above, the CDDRF Site Plan was revised in response to comment 6 above and is provided in Attachment 5 of this response.

8. **On the Site Plan, please show how the location of the sign posting a list of wastes that will not be accepted [F.A.C. Rule 62-701.320(7)(f)6].**

Response: The CDDRF Site Plan was revised to show the approximate location of the referenced sign. The revised CDDRF Site Plan is provided in Attachment 5.

ADDITIONAL INFORMATION REPORT:

1. **Item 1, Solid Waste Description: Please identify the types of wastes that are likely to be received by the facility that fall under the definition of "construction and demolition debris". Any waste type not defined here would be considered unauthorized waste at this facility [F.A.C. Rule 62-701.200(24) and 62-701.200(121)].**

Response: The referenced definition of 'Construction & Demolition Debris' (C&D) in F.A.C. Rule 62-701.200(24) provides a complete list of the types of waste that fall under this definition and will likely be received at the CDDRF. Therefore, and in lieu of listing every type of C&D waste expected, a reference to the regulatory definition of C&D was added to Item 1.

2. **Item 3, Operations and Functions of Processing: Please describe "unauthorized waste" [F.A.C. Rule 62-701.710(2)(a) and (4)(a)2].**

Response: Unauthorized wastes were described in the documents submitted to be hazardous or biomedical wastes as stated in Section 5.3 of the Operations Plan. This description has since been revised to indicate unauthorized wastes include both hazardous and non-hazardous wastes. The information required by the referenced rule, or F.A.C. Rule 62-701.710(4)(a)2, that being a plan to inspect the wastes received by the facility, inspection procedures, and procedures to handle unauthorized wastes, is provided in Section 5.0 of the Operations Plan. The other referenced rule, or F.A.C. Rule 62-701.710(2)(a), requires a description of the solid waste to be received by the facility and, as unauthorized wastes are not proposed to be received, are not discussed in Item 1 which is where the information required by the referenced rule is provided. In other words, the information required by F.A.C. Rule 62-701.710(2)(a) is not required in the referenced Item 3 as it is provided in Item 1 of the Additional Information document.

Item 3 provides the information required by F.A.C. Rule 62-701.710(2)(c) as identified in the heading of Item 3. The requested description of unauthorized waste is provided elsewhere in the submitted documents, i.e., Sections 5.2 and 5.3 of the Operations Plan. The reference to 'unauthorized wastes' in Item 3.a., along with the references to other types of wastes such as recyclables and non-recyclables/residues, is in a general sense as Item 3.a. describes 'Regular Facility Operations' as required by F.A.C. Rule 62-701.710(2)(c)1 and as the heading suggests.

3. **Item 3, Operations and Functions of Processing: Please specify storage containers and/or bunker sizes for recyclables and non-recyclables/residues. Also, please provide storage capacities for the processible and non-processible non-recyclables/residues and their identity [F.A.C. Rule 62-701.710(2)(e)].**

Response: As previously indicated, information submitted to the Department during the meeting on May 19, 2010 pertaining to the anticipated volumes and types of incoming C&D material and the anticipated storage types and capacities that may be provided at the CDDRF has been incorporated into this response as Addendum 1.

4. **Item 3, Operations and Functions of Processing Equipment: Please provide the manufacturer's schematic for the facility's sorting equipment and whether it will have a roof structure. Please show positioning, type, and capacity of the storage containers used for recycled materials being extracted and identify the sorted materials (F.A.C. Rule 62-701.710(2)(c)].**

Response: A plan and profile of the proposed sorting/processing equipment was obtained from the anticipated manufacturer and has been added as Figure 1 to the Additional Information document and referenced as such in Item 3. The revised Additional Information document containing the above-noted changes as well as other revisions referenced in the responses to other comments below, is provided in Attachment 6 to this response. The proposed processing equipment will likely have a roof structure but will not be enclosed as indicated in Sections 2.1 and 4.4 of the Operations Plan where it states that no areas or facility operations will be enclosed. The storage bunkers integral to the processing equipment are shown on the plan provided in the above-referenced Figure 1. The recyclable materials that may be temporarily stored in these bunkers prior to removal will likely change over time as the recyclables market conditions change, as conditions in the SWD's associated operations change, and as incoming C& D types and volumes change. These bunkers may or may not include roll-off containers for materials depending on the type(s) of material that will be placed in these bunkers. Although Figure 1 designates certain types of recyclables that may be stored in the bunkers, these designations are for reference only and will likely change as operating conditions change. Also refer to Addendum 1 for the information submitted to the Department during the meeting on May 19, 2010 pertaining to the anticipated volumes and types of incoming C&D material and the anticipated storage types and capacities that may be provided at the CDDRF.

5. **Item 4, Design Requirements: Please provide the capacity of any onsite storage areas for recyclable materials, non-processible wastes, processible wastes, unauthorized wastes and residue. Please describe the specific type of wastes and materials to be stored in these areas [F.A.C. Rule 62-701.710(2)(e)].**

Response: See the response to comment 3 above. The requested information which is required by F.A.C. Rule 62-701.710(2)(e) is provided in Item 6 of the Additional Information document. Item 4 provides information required by F.A.C. Rule 62-701.710(3) as noted in the heading of Item 4. Item 4.c. provides information demonstrating the CDDRF is able to evaluate the quantity of all incoming C&D waste and recovered materials and indicates storage areas will be sufficiently sized to hold the expected volumes of materials until they are transferred for disposal or recycling as required by F.A.C. Rule 62-701.710(3)(c). Further and as previously indicated, Addendum 1 to this response provides information submitted to the Department during the meeting held on May 19, 2010 pertaining to the anticipated volumes and types of incoming C&D material and the anticipated storage types and capacities that may be provided at the CDDRF.

6. **Item 5, Loading, Unloading, Storage and Processing Areas: Specify the types and volumes of C & D waste materials that are expected at this facility and the approximate volume of storage areas to meet that projection [F.A.C. Rule 62-701.710(2)(d), (2)(e) and (3)(c)].**

Response: The requested information pertaining to the types and volumes of C&D waste materials expected at the CDDRF, which is required by F.A.C. Rule 62-701.710(2)(a), is provided in Item 1 of the Additional Information document. Further, documentation that the CDDRF meets the design criteria specified by the referenced rule, F.A.C. Rule 62-701.710(3)(c), which includes assurances that the waste processing facility has made provisions for evaluating the quantity of all incoming solid waste and recovered materials and that facility's storage areas will be sufficiently sized to hold the expected volumes of materials until they are transferred for disposal or recycling, is provided in Item 4.c of the Additional Information document. The requested information pertaining to the approximate volume of storage areas that will be provided, which is required by F.A.C. Rule 62-701.710(2)(e), is provided in Item 6, 'Capacity of Onsite Storage Areas'. The requested information to show that the volume of storage areas provided is sufficient for the types and volumes of C&D wastes expected at the CDDRF is also provided in Item 6. Item 5 provides a description of the loading, unloading, storage, and processing areas at the CDDRF which is required by F.A.C. Rule 62-701.710(2)(d) and, as such, does not specify the types and volumes of C&D materials expected because this information is provided in Item 1 which, again, is required by F.A.C. Rule 62-701.710(2)(a). As stated above, the requested information does not correspond to the information provided in Item 5 which pertains to the loading, unloading, storage and processing areas, and corresponds to F.A.C. Rule 62-701.710(2)(a) as indicated by the heading of Item 5.

Finally, as previously indicated, Addendum 1 to this response provides information submitted to the Department during the meeting held on May 19, 2010 pertaining to the

anticipated volumes and types of incoming C&D material and the anticipated storage types and capacities that may be provided at the CDDRF as needed.

7. **Item 6, Capacity of Onsite Storage Areas: Hazardous waste is given as an example for storage of unauthorized waste. Unauthorized waste received can be categorized as either hazardous or non-hazardous waste. Please reference F.A.C. Rule 62-701.710(4)(g) for how the facility is to handle hazardous waste.**

Response: Originally, unauthorized waste included only hazardous and/or biomedical waste as indicated in Section 5.3 of the Operations Plan. However, this has been changed to include all non-C&D wastes as unauthorized wastes including both hazardous and non-hazardous wastes. As such, Section 5.0 of the Operations Plan has been revised to indicate this designation for unauthorized waste. As such, the term 'unacceptable' waste has been removed from the Additional Information document, the Operations Plan and the CDDRF Site Plan. The revisions to Section 5.0 of the Operations Plan now indicate that unauthorized wastes include both hazardous and non-hazardous wastes and that non-hazardous wastes include MSW, other Class I waste, certain Class III wastes and all other non-hazardous waste that are not C&D debris where C&D debris is defined in F.A.C. Rule 62-701.200(24). Note that the Department has previously issued a memorandum stating that nominal amounts of certain non-C&D wastes may be expected to be delivered along with C&D waste materials.

It is understood that the referenced rule indicates how the Facility is to handle hazardous waste. Further, Section 5.3 of the Operations Plan has been revised to incorporate the language in the referenced rule for handling hazardous wastes if encountered as requested in comment 7 under the 'Operations Plan' section of the RAI. The revised Operations Plan containing the noted revisions to Section 5.0 is provided in Attachment 7 of this response.

8. **Item 10, Closure Plan: Please provide a note that stored putrescible waste shall continue to be managed in accordance with paragraph 62-701.710(4)(b). Also, provide a note addressing closure contamination evaluation for a facility that uses ground water monitoring in place of leachate control [F.A.C. Rule 62-701.320(7)(f) and 62-701.710(2)(c)]. [F.A.C. Rule 62-701.710(6)(c) and (d)].**

Response: The referenced language has been added to the Closure Plan as requested. Additionally, the Closure Plan did not address the contamination evaluation required by F.A.C. Rule 62-701.710(10)(b) because of the unique situation at the CDDRF. The ground water monitoring plan for the CDDRF incorporates monitoring wells that are part of the larger ground water monitoring network for the SWERF. The ground water monitoring program for the SWERF will continue to be implemented as required regardless of the closure of the CDDRF. The purpose of performing the contamination evaluation at the time

of closure is to determine whether the facility may discontinue operating the ground water monitoring system. If the evaluation indicates the potential for ground water contamination the facility is required to continuing operation the ground water monitoring system. As indicated above, because the SWERF will continue to implement the required ground water monitoring program which includes the wells proposed to monitor the CDDRF, there is no reason to perform the contamination evaluation because the CDDRF ground water monitoring program will continue to be implemented after closure of the CDDRF. This information has been added to the Closure Plan in Item 10 of the Additional Information document. The revised Additional Information document containing the noted revisions to Item 10 is provided in Attachment 6 of this response.

9. **Item 11, Financial Assurance Documentation: Please provide financial assurance for this facility. It is not an exempt processing facility, as referenced in F.A.C. Rule 62-701.710(10).**

Response: Item 11 of the Additional Information document has been revised to address financial assurance requested by the Department for closure of the CDDRF.

10. **Item 14, Enforcement History: Please address this Item of the application [F.A.C. Rule 62-701.320(3).]**

Response: The enforcement history of the SWD has been added to the Additional Information document as Item 14. There has been no enforcement against the SWD since operation of the SWD's solid waste facilities began. See the referenced new Item 14 in the revised Additional Information document provided in Attachment 6 of this response as noted above.

Appendix C – Operations Plan

1. **Section 2.1, Location: Please correct any reference to a Vicinity Map to be a Regional Map [F.A.C. Rule 62-701.320(7)(f)3].**

The reference to a Vicinity Map in Section 2.1 of the Operations Plan was revised to indicate a Regional Map as requested. The revised Operations Plan containing the referenced revisions to Section 2.1 is provided in Attachment 7 of this response as noted previously.

2. **Section 2.4, Transfer Plan: Please describe the types of discarded C & DD Materials that are considered processible or combustible material received and those types considered non-processible and non-combustible [F.A.C. Rule 62-701.200(24)].**

Response: The referenced Section 2.4 is not required by the rules pertaining to waste processing facilities but was provided as general information only. Therefore, and because the distinction of non-recyclables being either processible or non-processible has been removed from the submitted documents as indicated in the response to comment 7 under the 'Plans' section of the RAI, the requested information was not added to Section 2.4 of the Operations Plan.

3. **Section 4.1, Description of Operations: Please specify the types of recyclable, nonrecyclable, processible (combustibles), and non-processible (non-combustibles) C&DD materials. Indicate the expected volumes of each and locate their storage areas on the Site Plan [F.A.C. Rule 62-701.710(2)(e) and (3)(c)].**

Response: As previously referenced, Addendum 1 to this response provides information submitted to the Department during the meeting held on May 19, 2010 pertaining to the anticipated volumes and types of incoming C&D material and the anticipated storage types and capacities that may be provided at the CDDRF as needed.

4. **Section 4.2, Operating Hours: Please list normal operating hours for the CDDRF [F.A.C. Rule 62-701.710(4)(c)1].**

Response: The normal operating hours for the CDDRF have been added to Section 4.2 of the Operations Plan as requested. The revised Operations Plan containing the noted revisions to Section 4.2 is provided in Attachment 7 of this response.

5. **Section 4.4, Maximum Waste Storage Times and Quantities: For the maximum 20,000 cubic feet of combined processed and unprocessed waste onsite at any time, please indicate capacities by the types of recycled materials, unauthorized waste, an non-recycled materials that may be processible (combustible) or non-processible (non-combustible), etc. that will make up this amount [F.A.C. Rule 62-701.710(2)(e) and (3)(c)].**

Response: The information provided on the maximum volume of combined processed and unprocessed waste onsite at any time was added to the Operations Plan as agreed by the SWD and the South District office's Solid Waste Administrator and documented in correspondence to the Siting Coordination office dated June 26, 2009 and is only an estimate. Any attempt to quantify by type of materials that make up this quantity would be a projection only. Further, the types and approximate volumes of unprocessed and processed materials are unknown at this time and, even if projections of each type and volume were made, they will likely change over time as indicated in the comments provided at the beginning of this

response letter. However, and as previously indicated, Addendum 1 to this response provides information submitted to the Department during the meeting held on May 19, 2010 pertaining to the anticipated volumes and types of incoming C&D material and the anticipated storage types and capacities that may be provided at the CDDRF.

6. **Section 5.0, Waste Acceptance and Management: Specify types of wastes that have been encountered in current operations and will fall into the categories prohibited/unauthorized wastes, unacceptable solid wastes, and hazardous wastes [F.A.C. Rule 62-701.710(2)(e) and (3)(c)].**

Response: The types of wastes encountered in current operations, i.e., WTE and Class I and Class III landfills, include MSW, Class I and Class III wastes. All of these wastes, except for C & D debris which is included in the category of Class III wastes, would be unauthorized at the CDDRF. As indicated in the response to comment 7 under 'Additional Information', the designation of unauthorized wastes was revised to include both hazardous and non-hazardous wastes and Section 5.0 of the Operations Plan was revised accordingly. The revised Operations Plan containing the referenced revisions to Section 5.0 is provided in Attachment 7 of this response.

7. **Section 5.3, Unauthorized Wastes: Please incorporate the language in F.A.C. Rule 62-701.710(4)(g) for handling hazardous waste when encountered.**

Response: The referenced language has been incorporated into Section 5.3 of the Operations Plan as requested. The revised Operations Plan containing the referenced revisions to Section 5.3 is provided in Attachment 7 of this response.

8. **Section 10.0, Contingency Plan: Please reference F.A.C. Rule 62-701.320(7)(e)2 and (16)(a). Please provide a Contingency Plan that addressed the items listed in (16)(a), with no reference made to text outside of the written plan.**

Response: The requested Contingency Plan has been incorporated into the Operations Plan as Attachment 1. The revised Operations Plan incorporating the new Contingency Plan as Attachment 1 is provided in Attachment 7 of this response.

Appendix D – Ground Water Monitoring Plan

1. **Ground Water Monitoring Well Network: Well WTE-3S will be replaced by Well WTE-3SR. Please identify WTE-3SR (in place of WTE-3S) as the downgradient well.**

Response: All references to the replacement well as WTE-3S have been revised to refer to the well as WTE-3SR where 'R' denotes a replacement well. The revised Ground Water Monitoring Plan is provided in Attachment 8 of this response.

2. **Ground Water Sampling and Analyses: Please indicate that monitoring well sampling will consist of the parameters listed in F.A.C. Rule 62-701.730(4)(b). Phenols shall be eliminated from the Monitoring Plan and Xylenes shall be included in the parameters for analysis.**

Response: The requested changes have been made to the list of parameters to be monitored in the ground water monitoring system for the CDDRF. The revised Ground Water Monitoring Plan is provided in Attachment 8 of this response.

Copies of the Additional Information document and the Operations Plan with the revisions incorporated are provided in Attachments 9 and 10, respectively, of this response.

We trust this response satisfies the Department's request for additional information for the Construction and Demolition Debris Recycling Facility. Please call me at (239) 533-8930 if you have any questions pertaining to this response.

Sincerely,

6-15-10

Laura A. Gray, P.E., #50138
Engineering Manager
Solid Waste Division

LAURA A. GRAY
LICENSE
No. 50138
STATE OF FLORIDA
PROFESSIONAL ENGINEER

Attachments

Cc: Lindsey J. Sampson, SWD
Keith Howard, SWD
File II J101

LEE COUNTY
SOUTHWEST FLORIDA

BOARD OF COUNTY COMMISSIONERS

Bob Janes
District One

A. Brian Bigelow
District Two

Ray Judah
District Three

Tammy Hall
District Four

Frank Mann
District Five

Karen B. Hawes
County Manager

David M. Owen
County Attorney

Diana M. Parker
County Hearing Examiner

March 31, 2010

Mr. Charles Emery III
Department of Environmental Protection, South District
PO Box 2549
Ft Myers, FL 33902-2549

Re: Lee County Solid Waste Energy Recovery Facility, DEP Permit No. PA90-30H Additional Information for the Proposed Construction and Demolition Debris Recycling Facility (CDDRF)

Dear Mr. Emery:

Enclosed please find DEP Form 62-701.900(4) and supporting documents which are being submitted to request Department approval of the proposed Construction and Demolition Debris Recycling Facility (CDDRF) to be located at the existing Solid Waste Energy Recovery Facility (SWERF) site. The proposed CDDRF will manage construction and demolition debris (C & DD) generated in Lee and Hendry Counties.

The C & DD will be sorted into two primary categories; recyclables and residues/non-recyclables, with non-recyclables consisting of processible and non-processible materials. Recycled materials will be delivered to appropriate vendors for recycling. Processible residues will be processed at the SWERF and non-processible residues will be directed to the Lee/Hendry County Regional Solid Waste Disposal Facility's Class III Landfill in Hendry County. The CDDRF will also serve as an additional outlet for C & DD in light of the County's Mandatory Business Recycling Ordinance which requires 50 % diversion of all C & DD from qualifying projects located in unincorporated Lee County.

If you have any questions or comments, or need additional information, please contact me at (239) 533-8000.

Sincerely,

3/31/10

Laura A. Gray, PE, #50138
Engineering Manager
Solid Waste Division

Cc: Lindsey J. Sampson, LCSWD Director; Jim Lavender, LC Public Works Director
Scott Coovert, LC Assistant Attorney; ` File II J 101

DEP Application Form 62-701.900(4)

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form #: 62-701.900(4), F.A.C.

Form Title: Application to Construct, Operate, or Modify a Waste Processing Facility

Effective Date: January 6, 2010

Incorporated in Rule: 62-701.710(2), F.A.C.

APPLICATION TO CONSTRUCT, OPERATE, OR MODIFY A WASTE PROCESSING FACILITY

GENERAL REQUIREMENT: Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A minimum of four copies of the application shall be submitted to the Department District Office having jurisdiction over the facility. The appropriate fee in accordance with Rule 62-701.315(4), F.A.C., shall be submitted with the application by check made payable to the Department of Environmental Protection (DEP). Complete appropriate sections for the type of facility for which application is made and include all additional information, drawings, and reports necessary to evaluate the facility.

Please Type or Print in Ink

A. GENERAL INFORMATION

1. Type of facility (check all that apply):

☐ Transfer Station

☒ Materials Recovery Facility:

☒ C&D Recycling

☐ Class III MRF

☐ MSW MRF

☐ Other Describe: _____

☐ Other Facility That Processes But Does Not Dispose Of Solid Waste On-Site:

☐ Storage, Processing or Disposal for Combustion Facilities (not addressed in another permit)

☐ Other Describe: _____

NOTE: C&D Disposal facilities that also recycle C&D, shall apply on DEP FORM 62-701.900(6), F.A.C.

2. Type of application:

☒ Construction/Operation

☐ Operation without Additional Construction

3. Classification of application:

☒ New ☐ Substantial Modification

☐ Renewal ☐ Intermediate Modification

☐ Minor Modification

4. Facility name: Lee County Construction and Demolition Debris Recycling Facility*

5. DEP ID number: PA90-30H (WACS ID 93715) County: Lee

6. Facility location (main entrance): 10500 Buckingham Road, Fort Myers, FL 33905

* The C & D Debris Recycling Facility (CDDRF) will be located within the area covered by the site certification for the Lee County Solid Waste Energy Recovery Facility (SWERF).

7. Location coordinates:

Section: 24 Township: 44S Range: 25E

Latitude: 26° 38' 2" Longitude: 81° 45' 43"

Datum: NAD 83 Coordinate Method: Google Earth/USGS

Collected by: Laura Gray Company/Affiliation: Lee County Solid Waste Division

8. Applicant name (operating authority): Lee County Solid Waste Division

Mailing address: 10500 Buckingham Road, 2nd fl. Fort Myers FL 33905
Street or P.O. Box City State Zip

Contact person: Laura A. Gray Telephone: (239) 533-8930

Title: Engineering Manager lgray@leegov.com
E-Mail address (if available)

9. Authorized agent/Consultant: _____

Mailing address: _____
Street or P.O. Box City State Zip

Contact person: _____ Telephone: (____) _____

Title: _____ _____
E-Mail address (if available)

10. Landowner (if different than applicant): Lee County Board of County Commissioners

Mailing address: P.O. Box 398 Fort Myers FL 33902
Street or P.O. Box City State Zip

Contact person: Lindsey J. Sampson Telephone: (239)533-8000

sampsolj@leegov.com
E-Mail address (if available)

11. Cities, towns and areas to be served: Incorporated & Unincorporated areas of Lee and Hendry Counties

12. Date site will be ready to be inspected for completion: TBA; Approximately April 2011

13. Estimated costs:

Total Construction: $ 2,500,000 Closing Costs: $ 0

14. Anticipated construction starting and completion dates:

From: Upon Permit Issuance To: April 2011

15. Expected volume of waste to be received: _____ yds^3/day 500 tons/day

16. Provide a brief description of the operations planned for this facility: Construction and Demolition debris

delivered to the Facility will be processed by sorting and segregating by type and stored temporarily until removed for recycling and/or disposal.

B. ADDITIONAL INFORMATION

Please attach the following reports or documentation as required.

1. Provide a description of the solid waste that is proposed to be collected, stored, processed or disposed of by the facility, a projection of those waste types and quantities expected in future years, and the assumptions used to make the projections (Rule 62-701.710(2)(a), F.A.C.).

2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site (Rule 62-701.710(2)(b), F.A.C.).

3. Provide a description of the operation and functions of all processing equipment that will be used, with design criteria and expected performance. The description shall show the flow of solid waste and associated operations in detail, and shall include (Rule 62-701.710(2)(c), F.A.C.):
   a. Regular facility operations as they are expected to occur;
   b. Procedures for start up operations, and scheduled and unscheduled shut down operations; and
   c. Potential safety hazards and control methods, including fire detection and control.

4. Provide a description of the loading, unloading, storage and processing areas (Rule 62-701.710(2)(d), F.A.C.).

5. Provide the identification and capacity of any on-site storage areas for recyclable materials, non-processable wastes, unauthorized wastes, and residues (Rule 62-701.710(2)(e), F.A.C.).

6. Provide a plan for disposal of unmarketable recyclable materials and residue, and for waste handling capability in the event of breakdowns in the operations or equipment (Rule 62-701.710(2)(f), F.A.C.).

7. Provide a boundary survey, legal description, and topographic survey of the property (Rule 62-701.710(2)(g), F.A.C.).

8. Provide a description of the design requirements for the facility which demonstrate how the applicant will comply with Rule 62-701.710(3), F.A.C.

9. Provide an operation plan which describes how the applicant will comply with Rule 62-701.710(4), F.A.C. (Rule 62-701.710(2)(h), F.A.C.).

10. Provide a closure plan which describes generally how the applicant will comply with Rule 62-701.710(6), F.A.C. (Rule 62-701.710(2)(i). F.A.C.).

11. Unless exempted by Rule 62-701.710(10)(a), F.A.C., provide the financial assurance documentation required by Rule 62-701.710(7), F.A.C. (Rule 62-701.710(2)(j), F.A.C.).

12. Provide documentation to show that stormwater will be controlled according to the requirements of Rule 62-701.710(8), F.A.C.

13. Provide documentation to show that the applicant will comply with the recordkeeping requirements of Rule 62-701.710(9), F.A.C.

14. Provide a history and description of any enforcement actions by the applicant described in subsection 62-701.320(3), F.A.C. relating to solid waste management facilities in Florida. (Rules 62-701.710(2), F.A.C. and 62-701.320(7)(i), F.A.C.)

C. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

1. Applicant:

The undersigned applicant or authorized representative of Lee County Solid Waste Division

is aware that statements made in this form and attached information are an application for a C&D Debris Recycling Facility Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility.

Signature of Applicant or Agent

10500 Buckingham Road, 2nd floor
Mailing Address

Lindsey J. Sampson
Name and Title (please type)

Fort Myers, FL 33905
City, State, Zip Code

sampsolj@leegov.com
E-Mail address (if available)

(239) 533-8000
Telephone Number

4/1/10
Date

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, Florida Statutes):

This is to certify that the engineering features of this waste processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.

3/30/10
Signature

10500 Buckingham Road, 2nd floor
Mailing Address

Laura A. Gray, Engineering Manager
Name and Title (please type)

Fort Myers, FL 33905
City, State, Zip Code

lgray@leegov.com
E-Mail address (if available)

50138
Florida Registration Number
(please affix seal)

(239) 533-8930
Telephone Number

3/30/10
Date

Additional Information

Additional Information

Lee County Construction & Demolition Debris Recycling Facility

Located at the
Lee County Solid Waste Energy Recovery Facility
Pursuant to Conditions of Certification
PA90-30H

10500 Buckingham Road
Fort Myers, Florida 33905

Prepared by the
Lee County Solid Waste Division

LEE COUNTY
SOUTHWEST FLORIDA

Submitted to the
Florida Department of Environmental Protection
South District Office and
Siting Coordination Office

March 2010
Revised June 2010

LAURA A. GRAY
LICENSE
No. 50138
STATE OF FLORIDA
PROFESSIONAL ENGINEER

Laura A. Gray, P.E.
PE # 50138

RECEIVED
JUN 15 2010
D.E.P. South District

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Figure 1 – Plan and Profile of C&D Debris Material Recovery Facility
Attachment 1- Financial Test Documents

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1. Solid Waste Description (62-701.710(2)(a))

The solid waste that is proposed to be processed by the Lee County Construction & Demolition Debris Facility (CDDRF) includes construction and demolition debris (C&DD) from construction, renovation and demolition projects in incorporated and unincorporated areas of Lee and Hendry Counties. C&DD includes the materials identified in the regulatory definition found in F.A.C. Rule 62-701.200(24). The quantity of C&DD to be received at the CDDRF is expected to increase over time at a rate dependent on market forces in the construction industry. A summary of the average daily C&DD quantity per year anticipated to be received at the CDDRF are shown below.

Year	C&DD (Tons/Day)
2010	200
2011	240
2012	288
2013	346

Assumptions

1.) *Tons/day in 2010 were projected based on the average tons per day of C&D received at the SWERF during 2009 (the first year C&D was accepted at the SWERF).*
2.) *Tons/day in subsequent years was projected to increase 20% each year.*
3.) *Tons/Day will vary depending on County economic and seasonal fluctuations.*
4.) *The CDDRF has a processing capacity of 500 tons per day.*

2. Site Plan (62-701.710(2)(b))

A 'Solid Waste Energy Recovery Facility (SWERF) Site Plan' showing the location of the CDDRF relative to the SWERF, the Recovered Materials Processing Facility (RMPF), and the Transfer Station is provided in Appendix A. The SWERF Site Plan shows the features required by Rule 62-701.710(2)(b), Florida Administrative Code (FAC), including the County's total acreage (approximately 280 acres), the SWERF certified Site acreage (approximately 150 acres), the CDDRF acreage (approximately 5 acres), and the locations of two (2) wetlands (defined by dedicated conservation easements), both of which are located greater than 200 feet from the CDDRF site boundaries. An existing storm

water retention pond #2, which is part of the SWERF approved storm water management system, is located approximately 100 feet south of the CDDRF. There are no potable water wells on or within 500 feet of the CDDRF and no wells serving community water supplies within 1,000 feet of the CDDRF.

A CDDRF Site Plan, which was drawn at a larger scale (than the SWERF Site Plan) to show the various processing and storage areas within the CDDRF, is provided in Appendix B.

3. Operations and Functions of processing equipment (62-701.710(2)(c))

The operation and functions of the processing equipment to be used at the CDDRF as well as the flow of waste through the CDDRF are described in detail in the sections below. Design criteria and expected performance of the equipment was based on technical information provided by individual equipment manufacturers.

a. Regular Facility Operations

All incoming traffic to the CDDRF will use the SWERF's existing entrance road off of Buckingham Road and existing weigh scales and will access the CDDRF via the bypass road around the SWERF's tipping building. Outgoing traffic from the CDDRF will also utilize the SWERF's existing exit roads. Both the SWERF's and the CDDRF's roadways are designed to accommodate commercial trucks with either dump or rolloff bodies.

All vehicles destined for the CDDRF will enter the CDDRF at the southwest corner via the existing road serving the horticulture processing facility. Incoming vehicles delivering C&DD to the CDDRF will discharge their loads in the staging areas shown on the CDDRF Site Plan provided in Appendix B. Vehicles arriving to transfer materials from the CDDRF will enter the CDDRF as indicated above but will be directed to the designated loading area depending on the materials they will be removing.

Materials that will be removed from the CDDRF generally include recyclables, non-recyclables/residues, and unauthorized/prohibited wastes (which include both non-hazardous and hazardous wastes). Recyclables will be delivered to the appropriate commodity recyclers. Non-recyclables/residues will be delivered to the SWERF tipping floor or

to the County's Class III landfill located at the Lee/Hendry Landfill in Hendry County as appropriate based on the type of waste. Non-hazardous unauthorized wastes such as putrescible wastes will be delivered to the SWERF tipping floor for disposal. Hazardous unauthorized wastes will be returned to the customer or delivered to an appropriate approved disposal facility in accordance with the direction received from the Department.

C&DD received at the CDDRF will be loaded by loader or excavator with a grapple attachment onto the primary charging conveyor and will pass through several different sorting machines and picking lines where recyclables will be removed and placed in the appropriate storage bunker located below the conveyor/picking line. Non-recyclables/residues removed from the processing equipment will be separated into processible and non-processible components and temporarily stored in a suitable container or stockpile until removed for disposal. All sorted materials will be temporarily stored in the bunkers or in stockpiles until sufficient material is collected for loading into transfer vehicles. Bunkers are sized to accommodate a minimum of one load of material for transport based on the processing capacity of the CDDRF. The facility is rated to process up to 500 tons per day (shift).

The machinery and equipment to be used at the CDDRF includes mobile and stationary machinery and equipment. Mobile equipment includes 'handling' equipment, such as loaders and excavators, and transfer vehicles and equipment, such as transfer trailers, roll-off containers and their associated tractors, and trucks. The mobile equipment and vehicles expected to be used at the CDDRF includes one to two front-end loaders (John Deere 344 and/or 644 or equivalent; bucket capacity 3 and/or 7 cubic yard, respectively), one excavator with grapple, one to two skid-steer loaders, and various transfer vehicles which may include walking floor transfer trailers (100 cubic yard capacity) and associated tractors, dump trailers (30 cubic yard capacity) and tractors, and roll off containers (20 - 30 cubic yard capacity) and trucks. The stationary processing equipment includes conveyors, sorting equipment (magnet, density separator), screens, and storage bunkers. A plan and profile of the proposed processing equipment is provided in Attachment 1. A detailed description of the stationary equipment to be used is provided in Section 6.0 of the Operations Plan provided in Appendix C.

All vehicles leaving the CDDRF will exit at the location shown on the CDDRF Site Plan and travel on the existing SWERF's one-way loop road to the scale house to exit the facility. As indicated above, transfer vehicles loaded with non-recyclables will either continue to the SWERF's tipping floor or will travel to the County's Class III Landfill in Hendry County as appropriate based on the type of non-recyclable waste.

b. Start-up & Shutdown (Scheduled and Unscheduled) Procedures

The CDDRF will only require basic start-up or shutdown procedures (e.g. conveyor and sorting equipment start, etc.) to prepare for (or stop) normal operations. Start-up procedures are the same following both scheduled and unscheduled shut-downs.

Scheduled shutdowns will occur at the end of each operating day, and will involve parking all mobile equipment, turning off stationary equipment, and securing all vehicles and equipment.

Unscheduled shutdowns, such as for severe weather, will follow the procedures as described in the Operations Plan and are generally the same as for scheduled shutdowns, i.e., stationary equipment will be turned off and mobile equipment will be parked. All equipment will be secured and additional precautions for securing equipment and materials will be employed as dictated by the type of emergency or other situation responsible for the unscheduled shutdown.

c. Potential safety hazards and control methods

The stationary process equipment includes numerous "all stop" switches and cables to instantly stop the process equipment during emergencies. Additional hazards include the material drop chutes and working platforms, which will be equipped with safety railings or other appropriate safety markings or devices. Operating equipment will be equipped with backup alarms and all other required safety features.

Adequate fire protection and control methods will be available at the CDDRF at all times. Fire extinguishers will be mounted on all mobile equipment. Fire hydrants are located within the CDDRF operating areas as shown on the CDDRF Site Plan provided in Appendix B. Facility personnel will be trained in safety procedures including fire prevention and control measures and are instructed to immediately call 911 as necessary.

4. Design Requirements (62-701.710(3))

The design requirements are described as follows:

a. The processing equipment will have access and egress provided from various walkways, ladders and steps throughout the facility. The CDDRF, including all tipping, processing, sorting, and storage areas, are not enclosed; therefore, no ventilation is required. Litter control will be provided by temporary laborers and/or Facility staff who will periodically collect litter around the Facility. The CDDRF is bordered on the south and the west by the existing operations, i.e., SWERF and yard waste processing area, respectively, and on the north and east by wooded areas or otherwise non-residential areas, all of which provide adequate visual screening.

b. In accordance with Rule 62-701.710(10)(b), FAC, as the facility only accepts C&DD debris and all areas where waste is stored and/or processed are covered by a ground water monitoring system which meets the requirements of Rule 62-701.730(4)(b), FAC, the facility is exempt from the requirement to provide a leachate control system. The Lee County Solid Waste Division proposes to implement a Ground Water Monitoring (GWM) System for the CDDRF that meets the above-referenced rule. The GWM System is summarized in the CDDRF GWM Plan (GWMP) provided in Appendix D. The GWMP includes information on the proposed relocation of ground water monitoring wells WTE-3S and WTE-3D which are currently located within the CDDRF operational area. The GWMP describes the well installation and abandonment procedures that will be followed upon receiving Department approval of the proposed new location of wells WTE-3S and WTE-3D. A Ground Water Monitoring Well Location Map provided as Figure 1 in the GWMP shows the locations of the monitoring wells which are proposed to serve as the ground water monitoring well network for the CDDRF. The monitoring network will consist of well WTE-3SR (where 'R' denotes the replacement well) in its' new location just southwest of the CDDRF entrance and the SWERF's existing monitoring well WTE-4S as the two (2) downgradient or

detection wells and the SWERF's existing monitoring well WTE-2S located east of the CDDRF as the upgradient well.

c. All incoming C&DD and outgoing recyclables, non-recyclables, and unauthorized wastes will be weighed on the SWERF's existing scales to assess the quantity of these materials and/or wastes. Storage areas for each of the above-identified materials and/or wastes will be of sufficient size to hold the expected volume of these materials until they are transferred for disposal or recycling. The receiving area for incoming C&DD materials is an area with dimensions of approximately 100 feet by 100 feet. This area is sufficient to collect and manage incoming material and inspect for unauthorized materials. The CDDRF is of sufficient size to provide adequate space for unloading, processing, temporary storage, and loading activities and areas. A detailed description of the storage areas and/or containers/bunkers to be employed at the CDDRF are provided in Section 6.0 below.

5. Loading, Unloading, Storage, and Processing Areas (62-701.710(2)(d))

The loading, unloading, storage and process areas are shown on the CDDRF Site Plan provided in Appendix B and are described as follows:

a. Loading Area

The loading areas for recyclable(s), non-recyclables/residues, and unauthorized wastes generated at the CDDRF are located as shown on the CDDRF Site Plan in Appendix B. Vehicles arriving at the Facility to remove these materials will be positioned at the appropriate storage bunker or temporary material stockpile and will be ground loaded by front end loaders for transport. Generally this will occur adjacent to the storage bunkers or temporary material stockpiles in any of the clear space surrounding these areas.

b. Unloading Area

Incoming C&DD vehicles will enter the facility at the southwest corner of the CDDRF area and be directed to the unloading area which is located as shown on the CDDRF Site Plan in Appendix B. C&DD loads will be discharged in the designated area (approximately 100 ft. x 100 ft.) for

handling, pre-sorting and inspection for unauthorized materials. After initial discharge and pre-sorting of materials, the materials will be placed adjacent to the loading point for the CDDRF processing equipment for charging into the processing equipment as well as pre-sorting.

c. *Storage Area*

The facility incorporates numerous bunkers for the collection and storage of sorted recyclables and non-recyclables/residues as needed. Most of these bunkers are 15′ wide and approximately 30′ long with a minimum overhead clear-space of 12′. Other storage bunkers or storage areas (stockpile areas) consist of pushwalls situated to accommodate the temporary stockpiles of materials such as brick/block, metals, and recovered screened material (RSM). Other storage areas are described in Item 6 below.

6. Capacity of On-site Storage Areas (62-701.710(2)(e))

Approximately 500 square feet of storage for hazardous unauthorized wastes is provided at the facility. Additionally, approximately 500 square feet of storage for non-hazardous unauthorized wastes that are identified and pulled from incoming C&DD loads prior to processing is provided at the facility. Both of these temporary storage areas are located as shown on the CDDRF Site Plan in Appendix B and are discussed in the appropriate subsections of Section 5.0 of the Operations Plan. These areas are appropriately located near the tipping (unloading) area to accommodate their prompt transfer to these storage areas until they are removed for proper disposal. Any hazardous wastes identified in incoming C&DD loads will be recorded and returned to the customer or managed as outlined in the Operations Plan in accordance with the direction received from the Department. Non-hazardous materials transferred to the storage area will be transferred to the SWERF or to the Class III Landfill at the Lee/Hendry Landfill in Hendry County depending on the type of material. Other storage areas shown on the CDDRF Site Plan are designated for all classes of materials processed by the CDDRF. These include bunkers for various types of recyclables, e.g., wood, paper, glass, metals, etc., and stockpiles for aggregates such as brick, block, and RSM fines as well as for non-recyclables/residues.

7. **Plan for Handling and Disposal of Solid Waste in Case of Equipment Failure (62-701.710(2)(f))**

Should the facility suffer equipment failure, waste will be directed to the Solid Waste Transfer Station where some sorting will occur to separate processible material destined for the SWERF from non-processible material destined for the Class III disposal cell. Any recyclables that are found to be unmarketable will be disposed either onsite in the SWERF or transferred offsite to the appropriate disposal facility at the Lee/Hendry Landfill.

8. **Boundary Survey, Legal Description, and Topographic Survey of the Property (62-701.710(2)(g))**

A boundary survey with legal description and a topographic survey of the SWERF site was previously provided to the Department in a similar Post-Certification submittal provided for the Solid Waste Transfer Station in 2002. A copy of the above-referenced boundary survey is provided in Appendix E for the Department's reference.

9. **Operations Plan (62-701.710(2)(h))**

An Operations Plan for the CDDRF, which describes how the Facility operations will comply with Rule 62-701.710(4), FAC., is provided in Appendix C.

10. **Closure Plan (62-701.710(2)(i))**

The following discussion provides the Closure Plan which describes how the Facility will comply with Rule 62-701.710(6), FAC. The Lee County Solid Waste Division will notify the Department in writing prior to permanently ceasing operations and will specify a closing date. No waste will be received by the CDDRF after the specified closing date. Within 30 days after receiving the final solid waste delivery, the Lee County Solid Waste Division will remove or otherwise dispose of all solid waste and residue in accordance with the approved closure plan which is outlined in the following paragraph. Stored putrescible wastes will continue to be managed in accordance with paragraph 62-701.710(4)(b), F.A.C.

Closure of the CDDRF will include removal of all remaining processed and unprocessed materials by transfer to the appropriate commodity recycler or

disposal facility. Other closure activities consist of decommissioning and/or removal of the processing/sorting equipment and platforms located at the CDDRF. All storage bunkers or pushwalls will be removed and/or cleared of any materials or residues along with other processing equipment located at the CDDRF. Signage and/or other security features specific to the CDDRF will also be removed. The contamination evaluation required by F.A.C. Rule 62-701.710(10)(b) will not be performed because the ground water monitoring system implemented for the CDDRF will continue to be operated after closure of the CDDRF because the wells monitoring the CDDRF are part of the ground water monitoring well network for the SWERF. All closure activities will be completed within 180 days of the closing date. After all closure activities are completed, the Lee County Solid Waste Department will certify in writing to the Department that closure is complete.

11. Financial Assurance Documentation (62-701.710(2)(j))

The Lee County Solid Waste Division is responsible for the operation of the SWERF, the RMPF, and the Solid Waste Transfer Station, all of which are located at the SWERF, as well as the Lee/Hendry Landfill located in Hendry County. Any materials requiring disposal and/or transfer from the CDDRF as part of the closure activities will be managed at one of the above-noted Facilities. Based on the closure activities described in the Closure Plan provided above and given the capabilities of the Facilities operated by the Lee County Solid Waste Division, no significant closure costs are anticipated. However, the following is offered to demonstrate that the Lee County Solid Waste Division has the financial resources to cover the nominal costs associated with closure of the facility such as the removal and proper disposal of both processed and unprocessed C&DD and the processing equipment. For the purpose of this demonstration, it is assumed that closure of the facility in the manner outlined above would cost approximately $75,000.00. The Lee County Solid Waste Division submitted Financial Assurance documents to the Department under cover letter dated March 31, 2010 that demonstrate the County's financial resources are sufficient to cover approximately $37M in closure and post-closure care for three landfills it owns and operates. A copy of these Financial Assurance Documents are provided in Attachment 1. Based on these documents and the negligible incremental cost estimated to close the C&D Facility, the SWD has sufficient financial resources to properly close the CDDRF.

12. Storm Water System (62-701.710(9))

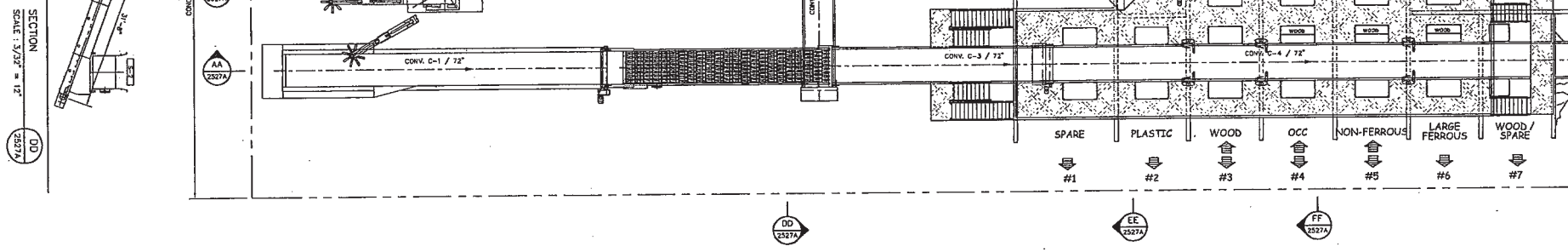
According to email correspondence dated September 3, 2009 from the Department's Siting Coordination Office, the storm water management plan calculations submitted to the Siting Office on June 15, 2009 with additional information submitted on August 13, 2009, reflect the addition of the C & D Recycling Facility (CDDRF), the expansion of the Recovered Materials Processing Facility, and the addition of the Vehicle Maintenance Facility. The Siting Office stated that based on the review conducted by the Department's South District office, there are no wetland issues associated with the expansion/additions and the existing storm water management system (with minor modifications to the storm water runoff routing via some swales and interconnecting piping) has been shown to be sufficient for the proposed work. A copy of the above-referenced Department email correspondence is provided in Appendix F. The Lee County Solid Waste Division will implement the referenced minor modifications to the storm water management system as part of the construction of and prior to operating the CDDRF; therefore, the storm water management system for the CDDRF has been shown to be sufficient as required.

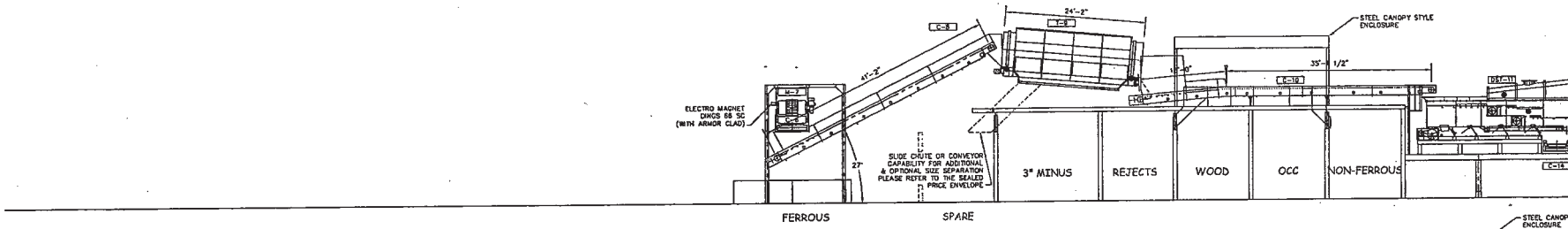
13. Recordkeeping (62-701.710(9))

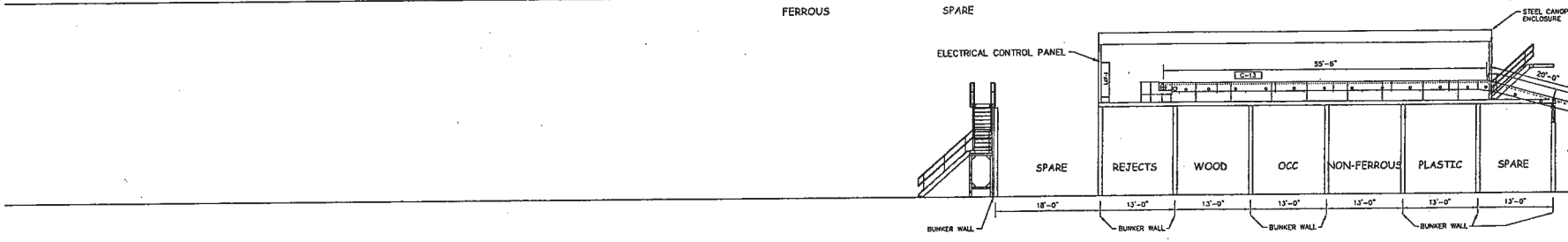
The Lee County Solid Waste Department will comply with the recordkeeping requirements of Rule 62-701.710(9), FAC, which are outlined in detail in Section 8.0 of the Operations Plan provided in Appendix C.

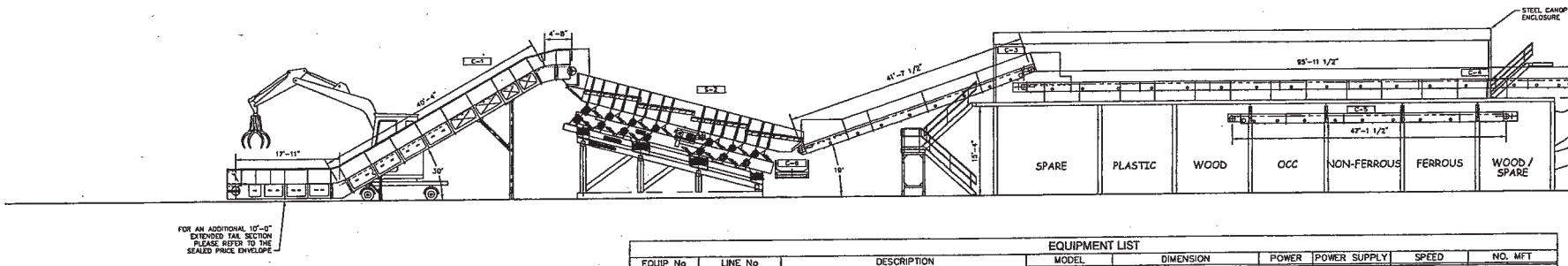
14. Enforcement History (62-701.320(3))

There have been no enforcement actions taken against any of the solid waste management facilities owned and/or operated by the Lee County Solid Waste Division.









EQUIPMENT LIST

EQUIP No	LINE No	DESCRIPTION	MODEL	DIMENSION	POWER	POWER SUPPLY	SPEED	NO. MFT
C-1	C & D	IN-FEED CONVEYOR	APRON/FM PAN	72" WIDE x 62'-11" LG.	15 HP	460/3/60	28 FPM (VFD)	
S-2	C & D	PRIMARY FINGER SCREEN 10" MINUS		72" WIDE x 40'-0" LG. APPROX	20 HP	460/3/60	----	
C-3	C & D	10" OVERS TRANSFER CONVEYOR	SLIDER BED	72" WIDE x 27'-2 1/2" LG.	5 HP	460/3/60	120 FPM	
C-4	C & D	10" OVERS SORTING CONVEYOR	SLIDER	72" WIDE x 95'-11 1/2" LG.	10 HP	460/3/60	100 FPM (VFD)	
C-5	C & D	WOOD TRANSFER CONVEYOR (REVERSIBLE)	SLIDER BED	36" WIDE x 47'-1 1/2" LG.	3 HP	460/3/60	100 FPM	
C-6	C & D	10" MINUS TRANSFER CONVEYOR	SLIDER BED	60" WIDE x 31'-8" LG.	5 HP	460/3/60	100 FPM	
M-7	C & D	MAGNETIC SEPARATOR	ELECTRO	60" WIDE	7 1/2 HP	460/3/60	455 FPM	
C-8	C & D	TROMMEL IN-FEED CONVEYOR	SLIDER BED	60" WIDE x 41'-2" LG.	5 HP	460/3/60	100 FPM	
T-9	C & D	FINES SCREENING TROMMEL	MACHINEX	6'-0" DIA x 24'-2" LG.	15 HP	460/3/60	6.5 RPM	
C-10	C & D	10" MINUS SORTING CONVEYOR	SLIDER BED	48" WIDE x 50'-1 1/2" LG.	7.5 HP	460/3/60	100 FPM (VFD)	
DST-11	C & D	HEAVY / LIGHT SEPARATOR "AIR DENSITY"	DESTONER	48" WIDE x 26'-5" LG.	5 & 75 HP	460/3/60	----	
C-12	C & D	LIGHT FRACTION TRANSFER CONVEYOR	SLIDER BED	36" WIDE x 17'-5" LG.	3 HP	460/3/60	100 FPM	
C-13	C & D	LIGHT FRACTION SORTING CONVEYOR	SLIDER BED	36" WIDE x 75'-6" LG.	7.5 HP	460/3/60	100 FPM (VFD)	
C-14	C & D	HEAVIES TRANSFER CONVEYOR	IDLER	48" WIDE x 20'-2" LG.	3 HP	460/3/60	100 FPM	

DWG. No.	TITLE
REFERENCE DRAWINGS	

No.	DESCRIPTION	DATE	BY
0	RELEASED FOR REVIEW	09/08/13	DAVID

REVISIONS

STAMP

STAMP

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SCALE :	3/32"=12"	
DESIGNED :	DAVID	DATE : 09/08/13
DRAWN :	DAVID	DATE : 09/08/13
CHECKED :	DAVID	DATE : 09/08/13
APPROVED :		DATE :

DESIGNED BY :
MACHINEX INDUSTRIES INC.
2121, Olivier Street
Plessisville, Quebec, Canada, G6L 3G9
Phone: (819) 362-3281
Fax: (819) 362-2280 E-Mail :

dwd

ADDITIONAL INFORMATION
REV. 1 JUNE 2010

ATTACHMENT 1

FINANCIAL ASSURANCE DOCUMENTS
(FINANCIAL TEST; DEP Form 62-701.900(5)(e))

Demonstrates Lee County Board of County Commissioners (BOCC) has sufficient financial resources to cover closing and long-term care costs of approximately $37M for three solid waste management facilities owned/operated by the Lee County BOCC

therefore it has sufficient resources to cover closure of the CDDRF.

Mail this and supporting documents to:
Solid Waste Financial Coordinator
Florida Department of Environmental Protection
2600 Blair Stone Road MS 4565
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(5)(e)
Form Title SWM Fac. Financial Test
Form Effective Date January 6, 2010
Incorporated in Rule 62-701.630(8)

STATE OF FLORIDA
SOLID WASTE MANAGEMENT FACILITY LETTER FROM CHIEF FINANCIAL OFFICER TO DEMONSTRATE FINANCIAL ASSURANCE

Director, Division of Waste Management
Florida Department of Environmental Protection

The term "Required Action," as used in this document means closing, long-term care, or corrective action, or any combination of these, which is checked below.

Check Appropriate Box(es): ☒ Closing ☒ Long-Term Care ☐ Corrective Action

I am the chief financial officer of Lee County Board of County Commissioners,
Name of Firm
P.O. Box 9366 Fort Myers, FL 33902.
Business Address

This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Part 264, as adopted by reference in Rule 62-701.630, Florida Administrative Code (F.A.C.).

Fill out the following seven paragraphs regarding facilities and associated cost estimates. If your firm has no facilities that belong in a particular paragraph, write "NONE" in the space indicated. For each facility, include its FDEP Identification Number, facility name, site address, and current "Required Action" cost estimates. Identify each cost estimate as to which "Required Action" it is for.

1. This firm is the owner or operator of the following solid waste management facilities in the State of Florida for which financial assurance for the "Required Action" is demonstrated through the financial test specified in Subpart H of 40 CFR Part 264, as adopted by reference in Rule 62-701.630, F.A.C. The current "Required Action" cost estimates covered by the test are shown for each facility:

WACS ID# 00074766 Lee/Hendry Co Regional SW Disposal Facilty
5500 Church Road, Felda, FL 33930

Class I Landfill (Phases 1A/1B and 2)	Closing	$8,373,056.00
	Long-Term Care	$10,182,211.00
Ash Monofill	Closing	$3,228,578.00
	Long-Term Care	$5,306,958.00
Class III Landfill	Closing	$5,009,797.00
	Long-Term Care	$4,720,464.00

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Part 264, as adopted by reference in Rule 62-701.630, F.A.C., the "Required Action" of the following solid waste management facilities in the State of Florida owned or operated by the guaranteed party. The current cost estimates for the "Required Action" so guaranteed are shown for each facility: NONE

[Paragraph 2 continued]

The firm identified above is *[Check Appropriate Box]*

☐ (1) the direct or higher-tier parent corporation of the owner or operator;

☐ (2) owned by the same parent corporation as the parent corporation of the owner or operator and receiving the following value in consideration of this guarantee _____ (Value received); or

☐ (3) engaged in the following substantial business relationship with the owner or operator - _____ (Business Relationship*) -

and receiving the following value in consideration of this guarantee _____ (Value received).

*(Attach a written description of the business relationship or a copy of the contract establishing such relationship to this letter.)

3. In states other than Florida, this firm, as owner or operator or guarantor is demonstrating financial assurance for the "Required Action" of the following solid waste management facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Part 264, as adopted by reference in Rule 62-701.630, F.A.C. The current "Required Action" cost estimates covered by such test are shown for each facility: NONE

4. This firm is the owner or operator of the following solid waste management facilities for which financial assurance for the "Required Action" is not demonstrated to the federal government or other state government through the financial test or any other financial assurance mechanism specified in Rule 62-701.630, F.A.C., or equivalent or substantially equivalent federal or state mechanisms. The current "Required Action" cost estimates not covered by such financial assurance are shown for each facility: NONE

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144 and/or Rule 62-28.270(9), F.A.C. The current plugging and abandonment cost estimates as required by 40 CFR 144.62 and/or Rule 62-28.270(9), F.A.C., are shown for each facility: NONE

6. This firm is the owner or operator of the following hazardous waste facilities for which financial assurance for closure, post-closure care, corrective action and/or liability coverage is required under 40 CFR Parts 264 and 265, Subpart H and/or Rule 62-730.180, F.A.C. The current closure, post-closure care, corrective action cost estimates and/or liability coverage as required by 40 CFR Parts 264 and 265, Subpart H and/or Rule 62-730.180, F.A.C., are shown for each facility: NONE

7. This firm is the owner or operator of the following underground storage tank (UST) facility(ies) for which financial responsibility for liability coverage and corrective action is required under 40 CFR Parts 280 and 281 and/or Rule 62-761.450(3), F.A.C. The amount of annual aggregate coverage for liability coverage and corrective action being assured by a financial test are shown for each facility: NONE

This firm Is not required to file a Form 10K with the Securities and Exchange Commission
"is required" or "is not required"
(SEC) for the latest fiscal year. The fiscal year of this firm ends on September 30. The figures
Month, Day
for the following items marked with an asterisk (*) are derived from this firm's independently audited, year-end financial statements and footnotes for the latest completed fiscal year, ended September 30, 2009.
Date

Fill in Alternative I if the criteria of Rule 62-701.630 (6)(c) 1., F.A.C., are used.
Fill in Alternative II if the criteria of Rule 62-701.630 (6)(c) 2., F.A.C., are used.

ALTERNATIVE I

1. Sum of current "Required Action" cost estimates and annual aggregate liability coverage. $ _____
(Total of all costs listed in 1-7 above)

* 2. Total liabilities. $ _____
(If any portion of the "Required Action" cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 3 and 4.)

* 3. Tangible net worth. $ _____

* 4. Net worth. $ _____

* 5. Current assets. $ _____

* 6. Current liabilities. $ _____

* 7. Net working capital. $ _____
(Line 5 minus line 6)

* 8. The sum of net income plus depreciation, depletion, and amortization. $ _____

* 9. Total assets in U.S. $ _____

	YES	NO
10. Is line 3 minus line 1 at least $10 million?		
11. Is line 3 at least 3 times line 1?		
12. Is line 7 at least 3 times line 1?		
13. Is line 9 at least 3 times line 1?		
14. Is line 2 divided by line 4 less than 1.5?		
15. Is line 8 minus $10 million divided by line 2 greater than 0.10?		

ALTERNATIVE II

1. Sum of current "Required Action" cost estimates and annual aggregate liability coverage. (Total of all costs listed in 1-7 above)	$ 36,821,064.00
2. Current unsecured investment grade bond rating of most recent issuance of this firm and name of rating service.	Lee County, Florida Capital Revenue Bonds Series 2006 CUSIP # 52348LC Moody's Aa2
3. Date of bond issuance.	October 19, 2006
4. Date of bond maturity.	October 1, 2026
* 5. Tangible net worth. (If any portion of the "Required Action" cost estimates is included in "total liabilities" on your financial statements, you may add that portion to this line.)	$ 3,619,708,800.00
* 6. Total assets in the U.S.	$ 5,047,698,315.00

	YES	NO
7. Is line 5 minus line 1 at least $10 million?	X	
8. Is line 5 at least 3 times line 1?	X	
9. Is line 6 at least 3 times line 1?	X	

The chief financial officer whose signature appears below hereby certifies that the wording of this letter is identical to the wording as adopted and incorporated by reference in Rule 62-701.900, F.A.C.

Signature	Date: 3/16/2010
Type Name: Charlie Green	Telephone Number: 239-533-2100
Title: Clerk of the Circuit Court	E-mail Address: soneill@leeclerk.org

KPMG LLP
Suite 1700
100 North Tampa Street
Tampa, FL 33602

Independent Accountants' Report on Agreed Upon Procedures

To the Board of County Commissioners
Lee County, Florida:

We have performed the procedures enumerated below which are included in Rule 62-701.630, Florida Administrative Code (F.A.C.), which were agreed to by the Florida Department of Environmental Protection (FDEP) and by the management of Lee County, Florida (the County), solely for the purpose of assisting the FDEP in evaluating management's assertion about the County's compliance with the financial test option as of September 30, 2009, included in the accompanying "State of Florida Solid Waste Management Facility Letter from Chief Financial Officer to Demonstrate Financial Assurance" (the Letter) to FDEP dated March 16, 2010 from Charlie Green, Clerk of the Circuit Court. The County is responsible for maintaining records in support of the compliance requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures enumerated below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and our findings, if any, are summarized as follows:

1. We obtained the correspondence from the Florida Department of Environmental Protection which approved the Ash Monofill, Class I Landfill, and Class III Landfill closing cost estimates and annual long-term cost estimates from the County and observed the closing cost estimates and annual long-term cost estimates agreed to the closing cost estimates and annual long-term cost estimates listed on page one of the Letter.

2. We summed the closing cost and annual long-term cost estimates listed on page one of the Letter and agreed the sum to the amount in line 1, under the caption titled Alternative II in the Letter.

3. We read the Moody's Investors Service report on the rating of the Lee County, Florida Capital Revenue Bonds, Series 2006 and determined the rating and the name of the rating service on the report agreed to the rating and the name of the rating service on line 2, under the caption titled Alternative II in the Letter.

4. We agreed the date of bond issuance on line 3, under the caption titled Alternative II in the Letter, to the date of bond closing for the issuance of the Lee County, Florida Capital Revenue Bonds, Series 2006.

5. We read the Official Statement for the Lee County, Florida Capital Revenue Bonds, Series 2006 and determined that the latest maturity of the bonds issued in the Official Statement agreed with the bond maturity date listed on line 4, under the caption titled Alternative II in the Letter.

KPMG LLP, a U.S. limited liability partnership, is the U.S. member firm of KPMG International, a Swiss cooperative.

6. We compared the amount of $3,619,708,800 appearing on line 5 labeled "Tangible Net Worth" under the caption titled Alternative II in the Letter, to the amount listed as "total net assets" under the column labeled Total in the County's September 30, 2009 Comprehensive Annual Financial Report, less $19,200 of intangible assets plus $11,843,000 of landfill closure and postclosure liabilities, and observed that such amounts agreed.

7. We compared the amount of $5,047,698,315 appearing on line 6 under the caption titled Alternative II in the Letter, to the total amount of assets in the County's September 30, 2009 Comprehensive Annual Financial Report, and observed a difference of $685, which represents assets held outside the United States.

8. Based on representations from management and the procedures performed by us as outlined in this report, no matters came to our attention which caused us to believe that the specified data should be adjusted.

9. We observed that the difference between the amount of $3,619,708,800 appearing on line 5 under the caption titled Alternative II in the Letter, minus the amount of $36,821,064 appearing on line 1 under the caption titled Alternative II in the Letter, was greater than $10 million.

10. We multiplied the amount of $36,821,064 appearing on line 1 under the caption titled Alternative II in the Letter, by three (3), and compared the results of that amount to the amount of $3,619,708,800 appearing on line 5 under the caption titled Alternative II in the Letter, noting that the amount in line 5 under the caption titled Alternative II in the Letter to be greater.

11. We multiplied the amount of $36,821,064 appearing on line 1 under the caption titled Alternative II in the Letter, by three (3) and compared the results of that amount to the amount of $5,047,698,315 appearing on line 6 under the caption titled Alternative II in the Letter, noting that the amount in line 6 under the caption titled Alternative II in the Letter to be greater.

12. We inquired of management of the County and obtained representation that all of the County's assets are located in the United States of America, except for $685 belonging to the Visitor and Convention Bureau.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on management's assertion. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Board of County Commissioners of Lee County, Florida and management, and for filing with the FDEP in accordance with the requirements of Rule 62-701.630(6)(c), Florida Administrative Code, and is not intended to be and should not be used by anyone other than these specified parties.

KPMG LLP

March 29, 2010
Certified Public Accountants

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Lee (County of) FL

Moody's Org ID: 600026845 6 Digit CUSIP: 523462, 523480, 523481, 523482, 523484, 523485 ...More

Seniormost Tax Backed Rating	Aa2	Market Segment	U.S. Public Finance
Seniormost Revenue Backed Rating	Aa2	Sector	COUNTY, HOUSING
Long Term Issuer Rating	Aa2		
Outlook	No Outlook		

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	Date	Document Type	Title
	08 Apr 2009	Rating Update	MOODY'S AFFIRMS LEE COUNTY'S Aa2 ISSUER RATING
	07 Sep 2006	Rating Update	MOODY'S AFFIRMS Aa3 RATING ON LEE COUNTY'S (FL) CAPITAL REVENUE BONDS, SERIES 2006
	07 Aug 2006	New Issue	MOODY'S ASSIGNS UNDERLYING Aa3 RATING TO LEE COUNTY'S (FL) CAPITAL REVENUE BONDS, SERIES 2006
	23 Nov 2005	New Issue	MOODY'S ASSIGNS A3 UNDERLYING RATING TO FLORIDA GOVERNMENTAL UTILITY AUTHORITY'S (FL) UTILITY REVENUE BONDS (LEHIGH UTILITY SYSTEM), SERIES 2005
	11 May 2005	New Issue	MOODY'S ASSIGNS A3 UNDERLYING RATING TO LEE COUNTY (FL) TRANSPORTATION FACILITIES REVENUE BONDS, SERIES 2005B
	08 Dec 2004	New Issue	MOODY'S ASSIGNS A3 UNDERLYING RATING TO LEE COUNTY (FL) TRANSPORTATION FACILITIES REFUNDING REVENUE BONDS, SERIES 2005A
	22 Sep 2004	New Issue	MOODY'S ASSIGNS INITIAL A3 UNDERLYING RATING TO LEE COUNTY'S (FL) $28.085 MILLION FIVE CENT LOCAL OPTION GAS TAX REFUNDING REVENUE BONDS, SERIES 2004
	21 Apr 2004	New Issue	MOODY'S ASSIGNS A1 RATING TO LEE COUNTY'S (FL) $56.99 MILLION CAPITAL REVENUE BONDS, SERIES 2004
	15 Jan 2004	Rating Update	MOODY'S AFFIRMS A3 UNDERLYING RATING ON LEE COUNTY (FL) TRANSPORTATION FACILITIES REFUNDING REVENUE BONDS, SERIES 2004B
	18 Dec 2003	New Issue	MOODY'S ASSIGNS A3 RATING TO LEE COUNTY (FL) TRANSPORTATION FACILITIES REFUNDING REVENUE BONDS, SERIES 2004B
	10 Dec 2003	New Issue	MOODY'S ASSIGNS A3 RATING TO LEE COUNTY (FL) TRANSPORTATION FACILITIES REVENUE BONDS, SERIES 2004A
	24 Oct 2003	New Issue	REVISED. MOODY'S ASSIGNS A1 UNDERLYING RATING TO LEE COUNTY (FL) $42.37 MILLION CAPITAL AND TRANSPORTATION REFUNDING REVENUE BONDS, SERIES 2003; OUTLOOK STABLE
	24 Oct 2003	New Issue	MOODY'S ASSIGNS A1 UNDERLYING RATING TO LEE COUNTY (FL) $42.37 MILLION CAPITAL AND TRANSPORTATION REFUNDING REVENUE BONDS, SERIES 2003; OUTLOOK STABLE
	27 May 2003	New Issue	MOODY'S UPGRADES UNDERLYING RATING TO A2 ON LEE COUNTY (FL) $202,430,000 WATER AND SEWER REVENUE BONDS
	10 May 2001	New Issue	MOODY'S ASSIGNS A3 RATING TO $66.1 MILLION LEE COUNTY, FL TRANSPORTATION FACILITY REFUNDING REVENUE BONDS, SERIES 2001A
	05 Jun 2000	New Issue	Lee (County of) FL
	07 Apr 1999	New Issue	Lee (County of) FL
	19 Feb 1999	New Issue	Lee (County of) FL
	03 Jul 1997	New Issue	Lee (County of) FL
	25 Apr 1997	New Issue	Capital Rfdg. Revenue Bonds, Series '97A and Capital Revenue Bonds, Series '97B
	09 Sep 1994	Update	Lee County

Results 1 - 21 of 21 Page 1 of 1

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NEW ISSUE — Book-Entry-Only **RATINGS: See "RATINGS" herein.**

In the opinion of Bond Counsel, under existing statutes, regulations, rulings and court decisions, assuming continuing compliance by the County with certain tax covenants and the accuracy of certain representations, interest on the Series 2006 Bonds will be excludable from gross income for federal income tax purposes and will not be an item of tax preference for purposes of the federal alternative minimum tax imposed on individuals and corporations. Bond Counsel is further of the opinion that the Series 2006 Bonds and interest thereon will not be subject to taxation by the State of Florida, except as to estate taxes and taxes under Chapter 220, Florida Statutes, on interest, income or profits on debt obligations owned by corporations, as defined in said Chapter 220. See "TAX MATTERS" herein.

$63,605,000
LEE COUNTY, FLORIDA
Capital Revenue Bonds
Series 2006

Dated: Date of Delivery **Due: October 1, as shown on the inside cover**

The Lee County, Florida Capital Revenue Bonds, Series 2006 (the "Series 2006 Bonds") will be issued by Lee County, Florida (the "County") as fully registered bonds and, when issued, will be registered in the name of Cede & Co. as registered owner and nominee of The Depository Trust Company, New York, New York ("DTC"). DTC will act as securities depository of the Series 2006 Bonds. Individual Purchases will be made in book-entry form, in denominations of $5,000 and integral multiples thereof. So long as Cede & Co. is the registered owner of the Series 2006 Bonds, as nominee for DTC, references herein to registered owners will mean Cede & Co. and not mean the Beneficial Owner of the Series 2006 Bonds. So long as Cede & Co. is the registered owner the Series 2006 Bonds, principal of and interest on the Series 2006 Bonds are payable by U.S. Bank, National Association, as Bond Registrar and Paying Agent, to Cede & Co., as nominee for DTC. Interest on the Series 2006 Bonds will be payable semi-annually on April 1 and October 1 of each year, commencing April 1, 2007. See "DESCRIPTION OF THE SERIES 2006 BONDS – Book Entry Only System," herein.

This cover page contains certain information for quick reference only. It is not a summary of the bond issue. Investors must read the entire Official Statement to obtain information essential to the making of an informed investment decision.

The Series 2006 Bonds will be subject to optional redemption prior to maturity as described herein.

The Series 2006 Bonds are being issued pursuant to the Constitution and laws of the State of Florida, particularly Chapter 125, Florida Statutes, and the terms of Resolution No. 85-10-10 adopted by the Board of County Commissioners of the County (the "Board") on October 23, 1985, as amended and supplemented, and as particularly amended and supplemented by a resolution adopted by the Board on September 19, 2006 (collectively, the "Resolution").

Proceeds received from the sale of the Series 2006 Bonds will be used to (i) finance the cost of acquisition and construction of a new jail complex and a new evidence building, and (ii) pay the costs of issuance of the Series 2006 Bonds, including the costs of a financial guaranty insurance policy and a debt service reserve surety bond.

The Series 2006 Bonds and interest thereon will be payable solely from and secured by a lien upon and a pledge of the Pledged Revenues, as herein described, on a parity with the County's other Bonds outstanding under the Resolution as further described herein. The Series 2006 Bonds will not be nor constitute general obligations or an indebtedness of the County within the meaning of any constitutional or statutory provisions or limitations and the County is not obligated to levy any ad valorem taxes for the payment thereof. No holder or holders of any Series 2006 Bonds will be entitled to payment of such principal of or redemption price, if applicable, and interest on the Series 2006 Bonds from any other moneys of the County except from the Pledged Revenues (described herein) in the manner provided in the Resolution.

Payment, when scheduled, of the principal of and interest on the Series 2006 Bonds will be insured by an irrevocable and unconditional financial guaranty insurance policy to be issued by XL Capital Assurance Inc. ("XLCA" or the "Insurer"), simultaneously with the delivery of the Series 2006 Bonds.

XL CAPITAL ASSURANCE

The Series 2006 Bonds are offered when, as and if issued and received by the Underwriters, subject to the approval of legality by Greenberg, Traurig P.A., Miami, Florida, Bond Counsel, and certain other conditions. Certain legal matters will be passed upon for the County by David M. Owen, Esquire, County Attorney, Fort Myers, Florida and by Squire, Sanders & Dempsey L.L.P., Tampa, Florida, Disclosure Counsel for the County. Public Financial Management, Inc., Fort Myers, Florida, has served as financial advisor to the County with respect to the offering of the Series 2006 Bonds. It is expected that the Series 2006 Bonds will be delivered in definitive form on or about October 19, 2006.

October 3, 2006

AMOUNTS, MATURITIES, INTEREST RATES, PRICES OR YIELDS AND INITIAL CUSIP NUMBERS

Maturity Date (October 1)	Principal Amount	Interest Rate	Yield	Initial CUSIP No.
2013	$ 2,530,000	4.00%	3.65%	52348LCD5
2014	2,635,000	4.00	3.69	52348LCE3
2015	2,275,000	5.00	3.76	52348LCF0
2016	2,390,000	5.00	3.83	52348LCG8
2017	2,510,000	5.00	3.89	52348LCH6
2018	2,630,000	5.00	3.93	52348LCJ2
2019	2,765,000	4.00	4.05	52348LCK9
2020	2,880,000	5.00	4.01	52348LCL7
2021	3,020,000	5.00	4.04	52348LCM5
2022	3,175,000	5.00	4.07	52348LCN3
2023	3,325,000	5.00	4.10	52348LCP8
2024	3,500,000	5.00	4.13	52348LCQ6
2025	14,620,000	5.00	4.15	52348LCR4
2026	15,350,000	4.375	4.46	52348LCS2

Appendices

Appendix A – SWERF Site Plan (with Vicinity Map)

Appendix B – CDDRF Site Plan

Appendix C – Operations Plan

Appendix D - Ground Water Monitoring Program

Appendix E - Lee County Property Boundary Survey

Appendix F - Department Email Correspondence Pertaining to the SWERF Storm Water Management System

Appendix A – SWERF Site Plan (with Vicinity Map)

Attachment 3

Revised SWERF Site Plan

DRAWINGS
ON
ATTACHED
PDF DOCUMENT
IN
OCULUS
UNDER SAME
INDEXING INFORMATION

Appendix B – CDDRF Site Plan

Attachment 5

Revised CDDRF Site Plan

DRAWINGS
ON
ATTACHED
PDF DOCUMENT
IN
OCULUS
UNDER SAME
INDEXING INFORMATION

Appendix C – Operations Plan

Attachment 10

Revised Operations Plan
(Revisions incorporated)

Operations Plan

Lee County Construction & Demolition Debris Recycling Facility

Located at the
Lee County Solid Waste Energy Recovery Facility
Pursuant to Conditions of Certification
PA90-30H

10500 Buckingham Road
Fort Myers, Florida 33905

Prepared by:
Lee County Solid Waste Division

LEE COUNTY
SOUTHWEST FLORIDA

Submitted to the
Florida Department of Environmental Protection
South District Office and
Siting Coordination Office

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FIGURE 1 – GROUND WATER MONITORING WELL LOCATION MAP

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1.0 GENERAL

The Lee County Solid Waste Division (the "County") will own and operate the Lee County Construction & Demolition Debris Recycling Facility (CDDRF) and has developed this Operations Plan to describe the operations, maintenance, and management of the CDDRF in accordance with the requirements of Rule 62-701.710(4), Florida Administrative Code (FAC). All operations at the CDDRF will be performed in accordance with this Operations Plan. The Operations Plan will be updated as operations change, but no less frequently than every five (5) years as applicable.

2.0 SITE LOCATION AND LAYOUT

The CDDRF will be located within the certified boundary of the Solid Waste Energy Recovery Facility (SWERF) at 10500 Buckingham Road in Fort Myers as shown on the SWERF Site Plan provided in Appendix A. The County owned property is approximately 280 acres in size, of which approximately 150 acres is 'certified' under the Power Plant Siting Act. The CDDRF site is approximately 5 acres.

2.1 Location

The SWERF Site Plan includes a Regional Map which shows the location of the SWERF relative to the main roadways in the vicinity of the SWERF. The SWERF Site Plan also shows the location of the CDDRF relative to the SWERF, the Recovered Materials Processing Facility (RMPF) and the Solid Waste Transfer Station. The CDDRF will be located on uplands just north of the SWERF and east of the horticulture processing area. Although the CDDRF operations will not be enclosed, they will be screened by current campus facilities and existing screening along the SWERF property boundaries.

2.2 Access

Access to the CDDRF is controlled by the SWERF's existing fencing and gates. The CDDRF entrance is at the southeast corner of the Site and is accessed

from the existing road to the Horticulture Processing and Recycling Facility which is west of the CDDRF as shown on the CDDRF Site Plan in Appendix B.

2.3 Traffic Management

The roads, unloading and loading areas within the CDDRF are designed for efficient movement and unloading/loading of vehicles. The roads are designed for the trucks to properly maneuver into and around the CDDRF Site. The flow of vehicles to the loading, unloading, and storage areas and the location of these areas are shown on the CDDRF Site Plan provided in Appendix B.

2.4 Transfer Plan

The transfer plan and route for non-recyclables/residue generated via processing at the CDDRF will be to either the SWERF tipping floor (processible or combustible material) or the Lee/Hendry Landfill (non-processible or non-combustible materials) located in Hendry County. The route to the landfill follows S.R. 82 east after exiting the SWERF via Buckingham Road south. Trucks will travel on S.R. 82 east approximately 30 miles where they will turn north onto South Church and travel approximately 3 miles until they reach the landfill entrance. Typically, the County will use transfer trucks to transport non-recyclables/residue. The number and type of transfer vehicles to be used, which are described in Section 6.0, may change to suit market and economic conditions. Transfer of materials to recycling facilities will be based on the type and quantity of materials to be delivered to recycling facilities. Common destination facilities include aggregate vendors, scrap steel facilities and the County's Materials Recycling Facility (MRF).

3.0 PERSONNEL

3.1 Responsible Authority

The Lee County Solid Waste Division Director will be responsible for the overall operation of the CDDRF.

3.2 Staffing

The person responsible for managing the CDDRF on a day-to-day basis is the CDDRF Operator. The CDDRF Operator will be trained as described below, will have the authority to make operating decisions on a daily basis, and will have a direct line of communication to the Director of the Lee County Solid Waste Division. The CDDRF will employ a sufficient number of trained operators, spotters, laborers, and other personnel to properly manage the operations at the CDDRF. All equipment operators and other personnel involved with facility operation are expected to be employees of Lee County. However, the County may contract for some or all of the CDDRF operations through private entities.

3.3 Training

The CDDRF Operator will receive at least 16 hours of initial training from the University of Florida TREEO Center (or equivalent) and at least 8 hours of continuing education every three years as required by Rule 62-701.320(15), FAC. An operator trained as described above will be on duty whenever the facility is operating.

Spotters will receive at least 8 hours of initial training from the University of Florida TREEO Center (or equivalent) and at least 4 hours of continuing education every three years as required by Rule 62-701.320(15), FAC. A trained spotter or a trained operator serving as a spotter will be on duty at all times that waste is received at the CDDRF to inspect the incoming waste and identify and remove unacceptable and unauthorized wastes.

4.0 GENERAL OPERATIONS

4.1 Description of Operations

All vehicles destined for the CDDRF will use the existing entrance road past the main scale house and scales. Collection vehicles arriving with construction & demolition debris (C&DD) will access the CDDRF via the bypass road around the SWERF. Transfer vehicles will be loaded by onsite equipment with any of the recyclable or non-recyclable materials processed at the facility. These may include, but are not limited to, ferrous and non-ferrous metals,

cardboard and other fiber products, wood and lumber, concrete, blocks/bricks and asphalt, roofing materials, drywall, recovered screen material (RSM), residue, and unauthorized waste. Recyclable materials will be transferred to various recycling facilities and/or may be used by the County as appropriate, e.g., RSM may be reused as initial or intermediate cover at the County's Lee/Hendry Landfill, and/or will be managed in accordance with Rule 62-701.730(13), FAC. Non-recyclables/residue generated via processing of C&DD may be disposed at the SWERF or at the County's Class III Landfill at the Lee/Hendry Landfill located in Hendry County as appropriate. Unauthorized waste will not be accepted at the CDDRF; however, if such wastes are found at the CDDRF, the procedures outlined in Sections 5.2 and 5.3 of this Operations Plan, as appropriate, will be followed; these wastes will ultimately be disposed at an approved facility.

Empty collection vehicles and loaded transfer vehicles will exit the CDDRF at the southwest corner of the Site, merge onto the site one-way loop road, and exit the property via the main exit road past the scale house and scales. Transfer vehicles with waste suitable for being processed at the SWERF will continue to the SWERF tipping floor. The County may use either of the three onsite scales, the scales at the Lee-Hendry Landfill or the scales at a recyclable materials destination facility to weigh the transfer vehicles.

4.2 Operating Hours

The CDDRF will normally accept C&DD during the same hours the SWERF accepts waste, or 6:30 am - 6:00 pm on Monday through Wednesday, 6:30 am - 5:00 pm on Thursday and Friday, and 6:30 am - 12:00 pm on Saturday, but may process and/or transfer materials to the SWERF 24 hours per day, 7 days per week, although processing and/or transfer outside of the normal operating hours is unlikely. The CDDRF may accept C&DD outside of the normal operating hours in response to emergencies, e.g., hurricanes, or following holidays or due to other unanticipated events. The facility operating hours will be posted at the main entrance.

4.3 Solid Waste Accepted at the Facility

Construction & demolition debris (C&DD) proposed to be accepted at the CDDRF will originate in incorporated and unincorporated areas of Lee and Hendry Counties. The waste includes residential, commercial, and industrial

construction and demolition debris from construction, renovation and remodeling or demolition projects. A sign stating 'No putrescibles, biomedical or hazardous wastes will be accepted' will be posted at the entrance to the CDDRF. Waste acceptance and inspection procedures and procedures for managing unauthorized wastes are discussed in Section 5.0 below.

4.4 Maximum Waste Storage Times and Quantities

C&DD will typically be processed within 72 hours of receipt but a longer storage time of up to seven (7) days may occasionally be required following holidays, hurricanes, or unanticipated events. Putrescibles removed from incoming C&DD will not be stored for more than 48 hours; however, in the event that storage lasts for greater than 48 hours, but in no case will storage of putrescibles last longer than 7 days, procedures to control vectors and odors will be implemented. Procedures for controlling vectors and odors include cleaning waste storage areas at least weekly. Only approved pesticides, i.e., as specified in Chapter 5E-2, FAC (Florida Department of Agriculture and Consumer Services), will be used if necessary. Processed and separated materials will be stored in the materials storage bunkers integral to the facility design until the quantity of material is sufficient for transport offsite.

The maximum combined quantity of processed and unprocessed waste at the CDDRF at any time will not exceed 20,000 cubic yards. This quantity was determined based on the size of the CDDRF and the capacity of processing equipment and storage areas and/or containers. Material storage stockpiles will be developed as dictated by the composition and quantity of incoming C&DD and will be located in the general area shown on the CDDRF Site Plan provided in Appendix B. The height of storage stockpiles will generally not exceed 20 feet above the ground surface elevation but may be higher depending on operating conditions and if suitable provisions and controls are implemented for stability.

As previously discussed, no areas of the proposed CDDRF are anticipated to be enclosed; however, the CDDRF operations will be screened by current campus facilities and existing screening along the property boundaries. In addition, litter controls, e.g., litter fencing and/or litter patrols will be implemented as needed to keep the site litter-free, especially during very windy periods. In the event that future operating areas will be in an enclosed building, the building will be equipped with a ventilation system in accordance with the design requirements of Rule 62-701.710(3)(a), FAC.

4.5 Operating Capacity

The facility is designed to handle 500 tons (nominal) of C&DD per day.

4.6 Expected Life of Facility

The facility can operate 10 years or more with proper maintenance.

5.0 Waste Acceptance and Management

The following procedures for waste acceptance and for managing unauthorized wastes will be implemented at the CDDRF:

5.1 Waste Inspection

An operator or spotter trained as described in Section 3.3 of this Operations Plan will inspect the incoming C&DD as collection vehicles unload and as the C&DD is loaded into the CDDRF processing equipment. In addition, an operator trained in accordance with Rule 62-701.320(15), FAC, will inspect at least three loads selected at random per week in accordance with Rule 62-701.710(4)(a)(2), FAC. The drivers of the selected loads will be directed to unload in an area slightly offset from the receiving area and to remain with the load until the inspection is completed. The operator will spread the load with the loader bucket and visually inspect the load for prohibited/unauthorized waste. In the unlikely event that unauthorized wastes are discovered at the facility, the site will follow the procedures for unauthorized wastes, which are provided in Sections 5.2 and 5.3 below.

5.2 Unauthorized Wastes (Non-hazardous)

Non-hazardous unauthorized wastes, which include MSW, other Class I wastes, Class III wastes with the exception of C&DD, and other non-hazardous wastes that are not C&DD, and are prohibited at the CDDRF will be removed from the incoming C&DD and placed in a suitable container in the location shown on the CDDRF Site Plan provided in Appendix B or returned to the customer for removal. These materials will generally be delivered to the SWERF tipping floor daily for disposal but may also be transferred for disposal in the County's Class III Landfill located at the Lee/Hendry Landfill in Hendry

County. The CDDRF Operator will determine the appropriate disposal facility depending on the types of wastes to be disposed. Procedures for managing putrescible wastes if found in C&DD loads are described in Section 4.4 of this Operations Plan.

5.3 Unauthorized Wastes (Hazardous)

Unauthorized wastes that are hazardous will not be accepted at the CDDRF. If hazardous wastes are suspected in a waste load, the facility operator will question the generator and/or driver and if necessary, contact the site supervisor and other personnel to verify the suspicious waste. If any regulated hazardous wastes are discovered to be improperly deposited at the CDDRF, the operator will promptly notify the Department, the person responsible for shipping the waste to the facility, and the generator of the wastes, if known. The area where the wastes are deposited will immediately be cordoned off from public access. If the generator or hauler can not be identified, the facility operator will assure the cleanup, transportation, and disposal of the waste at a permitted hazardous waste management facility. The area designated for these materials is the "unauthorized (hazardous) waste storage area" and is located as shown on the CDDRF Site Plan provided in Appendix B.

The Department will be notified if warranted as indicated above at (239) 332-6975 during normal business hours, and at (850) 413-9911, or toll free (800) 320-0519 during other hours, and the facility will follow the instructions from the Department.

6.0 Equipment

The CDDRF will utilize mobile and stationary equipment generally consisting of the following:

6.1 Rolling Stock

The machinery and equipment expected to be used at the site include one to two front-end loaders, one excavator with grapple, one to two skid-steer loaders. Other rolling stock equipment includes various transfer vehicles which may include walking floor trailers (100 cubic yards) and associated tractors,

dump trailers (30 cubic yards) and tractors, and roll off containers (20 - 30 cubic yards) and trucks.

6.2 Stationary Equipment

The stationary equipment used for handling and sorting the Construction and Demolition Debris and the flow of materials is described below:

6.2.1 Primary Screen: The primary screen receives all material and passes the material over 10" openings. The equipment includes several "drops" to help evenly distribute material and prevent materials from being trapped under other materials. Materials greater than 10" are directed to the primary sorting line and the materials less than 10" are directed for further processing.

6.2.2 Primary Sorting Line: Materials greater than 10" are received on this line and hand sorted. Materials may be positively or negatively sorted depending on the waste stream characteristics as well as market conditions. Typical materials include brick/block, clean wood, metals, cardboard, and plastics with non-recyclables/residue running off the end of the line to a stockpile which will be loaded into a transport vehicle for transfer and disposal.

6.2.3 Ferrous Belt Magnet: The magnet positively sorts ferrous materials from the 10" minus material and diverts this material to a storage bunker.

6.2.4 Fines screen: The fines screen consists of a finger screen, trommel or equivalent. Materials less than the screen dimension, typically 2", are directed to a fines bunker. Materials greater than 2" are directed to the secondary sorting line.

6.2.5 Secondary Sorting Line: This line is for targeting large items rejected by the fines screen and will be sorted into similar categories as the Primary Sorting Line prior to further processing.

6.2.6 Density Separator: The Density Separator receives materials from the Secondary Sorting Line and separates the materials by weight using air and/or screens. The light material typically includes paper and plastics which will be combined with the processible (combustible) non-recyclables/residue destined for the SWERF. The heavy material is typically rock, stones and other

inerts that can be used as aggregate and will be directed to the appropriate processed material storage stockpile.

6.2.7 Material Bunkers: Materials are collected in the recyclable materials storage bunkers until sufficient material has accumulated to transfer to the appropriate recycling and/or disposal facility.

7.0 Water Management and Monitoring

7.1 Water Management

The CDDRF and/or the SWERF includes the following water supply or water management facilities which will be operated and maintained as required and as discussed below.

7.1.1 Storm Water: The CDDRF site will be sloped appropriately to direct storm water into the approved storm water management system. The SWERF's existing approved storm water management system (with minor modifications consisting of swales and interconnecting piping) is adequate to manage storm water from the CDDRF as demonstrated by the calculations performed by the County's consultant which were approved by the Department in an email dated September 3, 2009. A copy of the Department's email is provided in Appendix F of the Post-Certification Submittal for the CDDRF.

7.1.2 Leachate: In accordance with Rule 62-701.710(10)(b), FAC, the CDDRF will be covered by a ground water monitoring system meeting the requirements of Rule 62-701.730(4)(b), FAC; therefore, no leachate system is required for the CDDRF. The referenced ground water monitoring system is described in greater detail in Section 7.2 below.

7.1.3 Potable Water: The facility water supply needs will be provided by the existing onsite water supply system.

7.1.4 Fire Protection: Water for fire protection will be supplied by the existing reclaimed water system which serves fire hydrants located throughout the SWERF campus. Fire hydrants will be located along the southern boundary of the CDDRF as shown on the CDDRF Site Plan in Appendix B. In addition, all stationary and mobile equipment will be equipped with fire extinguishers.

7.2 Ground Water Monitoring

A ground water monitoring program meeting the requirements of Rule 62-701.730(4)(b), FAC, will be implemented at the CDDRF. Figure 1, CCDRF Ground Water Monitoring Well Location Map, to this Operations Plan, shows the locations of the ground water monitoring wells that will comprise the monitoring well network for the CDDRF. The ground water monitoring network for the CDDRF will consist of existing ground water monitoring well WTE-2S located to the east of the CDDFF as the upgradient monitoring well and existing monitoring wells WTE-3SR ('R' denotes replacement well) and WTE-4S located southeast of the CDDRF as the downgradient monitoring wells.

The CDDRF ground water monitoring wells will be sampled semi-annually and the samples will be analyzed for the parameters listed in Rule 62-701.730(4)(b)4., FAC. A report containing the analytical results of the ground water monitoring will be submitted to the Department as required. A separate Ground Water Monitoring Plan was developed for the CDDRF and provided as Appendix D of the Post-Certification Submittal to the Department for its review and approval of the CDDRF.

8.0 Recordkeeping and Reporting

The following recordkeeping and reporting procedures will be implemented for the CDDRF:

8.1 Recordkeeping

Operational records will be maintained in accordance with Rule 62-701.710(9), FAC, which include a daily log of the quantity of solid waste received, processed, stored, and removed from the CDDRF for recycling or disposal, and the county of origin of the waste (e.g., Lee County), if known. The records will include each type of solid waste, recyclable/recovered materials, non-recyclables/residue, and unacceptable waste which is processed, recycled, and disposed. The records will be compiled monthly and will be available for inspection by Department personnel during hours of operation. The records will be retained at the facility for three years.

8.2 Reporting

In accordance with Rule 62-701.710(9)(b), FAC, and Rule 62-701.730(12), FAC, Lee County will submit an annual report to the Department on Form 62-701.900(7). The report will include a summary of the amounts and types of materials recycled. The county of origin of materials which are recycled, or a statement that the county of origin if unknown, will be included in the report. The report will be submitted no later than April 1 of each year for the preceding calendar year.

9.0 Safety

The Lee County Solid Waste Division is committed to providing a safe environment for both the public and staff and will take the following steps to ensure the safety of the customers and the staff of the CDDRF.

9.1 Public Safety

Safety procedures will be established for all personnel entering the CDDRF including private vehicles to prevent the exposure of the public to hazardous conditions and/or wastes. Unauthorized entry to the CDDRF is prevented by the SWERF's existing fencing and gates. Entry to the SWERF is controlled after hours by an automatic gate which can only be opened with security cards issued to authorized personnel only. Other safety procedures include traffic controls, signs, safety equipment, and appropriate staffing of competent individuals capable of dealing with any health or safety issues that may arise.

9.2 Control of Objectionable Odors

The CDDRF will be operated to control objectionable odors in accordance with Rule 62-296.320(2), FAC. As the materials received are non-putrescible, odors are not anticipated but best management practices will be employed to minimize nuisance odors. Wastes are handled on a first-in, first-out basis to the extent practicable. In addition, waste storage areas will be maintained as necessary to minimize odor and vector problems. Procedures for managing putrescible wastes are outlined in Sections 4.4 and 5.2 of this Operations Plan.

10.0 Contingency Plan

Every effort will be made to ensure that the CDDRF operates as required to avoid emergencies or delays in managing received materials. However, in the event of equipment breakdowns, emergencies, or transportation delays, the contingency plan outlined below will be implemented. Note that a separate Contingency Plan meeting the requirements of F.A.C. Rule 62-701.320(16) is provided as Attachment 1 of this Operations Plan.

10.1 Equipment Breakdown

A mechanic is on call from the Lee County Solid Waste Division in the event of equipment failure. In addition, the CDDRF Operator will ensure that backup equipment and/or parts are available or readily obtainable from equipment vendors or from other facilities as necessary.

10.2 Emergencies

Facility personnel will communicate with appropriate management personnel to handle any emergency situations that arise. In the event of a natural disaster where the CDDRF must be shut down with little notice, general procedures will include securing the site, materials, and equipment. Alternate procedures to be considered by CDDRF personnel include the following:

a. Material streams normally received at the facility may be processed on the tipping floor of the SWERF or the Solid Waste Transfer Station if operating during the emergency.

b. Material streams may be redirected to a landfill with permitted available airspace (e.g., the Lee/Hendry Landfill in Hendry County).

c. Waste Transport Delays: The CDDRF Operator will ensure that backup waste transport capabilities are in place either from local vendors or other facilities.

10.3 Fire and Explosion

Adequate fire protection will be available at the facility at all times as discussed in Section 7.1.4 of this Operations Plan. Fire extinguishers will be located throughout the CDDRF.

The local fire department is currently the Tice Fire District. The closest fire station (station # 3) is located at 5850 Buckingham Road, Fort Myers, FL 33905 and the phone number is (239) 694-2380. In the event of a significant fire or explosion, the Department of Environmental Protection will be notified at (239) 332-6975 during normal business hours or at (850) 413-9911 or (800) 320-0519 during other hours.

OPERATIONS PLAN
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ATTACHMENT 1

CONTINGENCY PLAN

CONTINGENCY PLAN
For the
Lee County Construction and Demolition Debris Recycling Facility

I. INTRODUCTION

This Contingency Plan was prepared for the Lee County Construction and Demolition Debris Recycling Facility (CDDRF) located on the campus of the Solid Waste Energy Recovery Facility (SWERF) at 10500 Buckingham Road in Fort Myers, Florida. This Contingency Plan meets the requirements of F.A.C. Rule 62-701.320(16) and is incorporated into the Operations Plan for the CDDRF as Attachment 1.

The purpose of the Contingency Plan is to ensure the CDDRF can respond to emergencies such as fires, explosions, spills, or natural disasters to minimize adverse impacts that may result from an emergency. This Contingency Plan will be kept at the CDDRF at all times and will be accessible to the facility operators.

In accordance with the above-referenced rule, this Contingency Plan includes the following information and/or procedures:

- Designates the person(s) responsible for its implementation;
- Outlines the procedures for notifying the appropriate emergency response persons or organizations, including the Florida Department of Environment Protection (Department), local government (City of Fort Myers), and local fire protection agencies.
- Describes the emergency procedures to be followed, including the location of fire-fighting equipment with explanations of how to use the equipment.
- Provides procedures for immediately shutting down parts of the facility affected by the emergency and for notifying customers of the closure of the facility as necessary.
- Outlines the procedures for notifying the facility's neighbors and the local government of the potentials impacts of the emergency and provisions to minimize those impacts.

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II. RESPONSIBLE PERSONS

The Director of the Lee County Solid Waste Division is responsible for implementing this Contingency Plan. The person responsible for the day-to-day operations of the CDDRF is the CDDRF Operator and, as such, will likely be the first individual to identify an emergency situation at the CDDRF. The CDDRF Operator will follow the procedures outlined in this Contingency Plan, including the initial notification procedures, in response to an emergency.

III. NOTIFICATION PROCEDURES

The following notification procedures will be implemented if an emergency occurs at the CDDRF.

- In the case of a life-threatening emergency such as a significant fire, explosion or injury requiring immediate medical attention, the CDDRF Operator or the person identifying the emergency will call 911 and explain the nature of the emergency.

The following general emergency notification procedures will be implemented for any emergency that occurs at the CDDRF. In the case of life-threatening emergencies as outlined above, the following notifications will be made after calling 911:

- The individual discovering the emergency will notify the CDDRF Operator of the emergency situation. If the CDDRF Operator can not be reached, the individual will notify the Solid Waste Division office at the number provided in Section IV. Emergency Contacts.
- The CDDRF Operator or the Solid Waste Division employee taking the initial emergency notification call will notify the Solid Waste Division Director at the number provided in Section IV. Emergency Contacts. .
- Upon assessing the emergency situation, the Division Director will determine if additional notifications are necessary.

The following notification procedures will be implemented corresponding to the type of emergency:

FIRE

In the event of a fire at or near the CDDRF, the following notification procedures will be implemented:

- The individual discovering the fire should notify the CDDRF Operator via cellular phone provided for communication at the site. In the absence of the CDDRF Operator, the individual will notify the Solid Waste Division office and/or the Solid Waste Division Director at the number(s) provided in the Emergency Contacts section below.
- If the fire is small and can be extinguished using site equipment, the CDDRF Operator or his/her designee will follow the procedures outlined in the Emergency Response Procedures section of the Contingency Plan and no additional notifications are required.
- As indicated above, if the fire is significant and/or is as a result of an explosion, the individual first identifying the fire will contact the local fire department at the number provided in the Emergency Contacts section below or will call 911.
- If the fire department is contacted to respond to the fire, the Solid Waste Division Director or his designee will also notify the Department of the incident at the number provided in Section IV. Emergency Contacts.

In the event of a fire within the waste or a waste pile at the CDDRF, all reasonable efforts will be made to immediately extinguish or control the fire as outlined in Section V. Emergency Response Procedures. If the fire cannot be extinguished or controlled within an hour, the CDDRF Operator or his/her designee will immediately:

1. Implement this Contingency Plan;
2. Cease accepting waste for disposal in those areas of the CDDRF impacted by the fire, and;
3. Notify the Department and the local government having jurisdiction over the CDDRF, i.e., City of Ft. Myers and/or Lee County Emergency Management, of the fire and of the fire control plan being implemented.

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If the fire cannot be extinguished or controlled within 48 hours, the CDDRF Operator or

his/her designee will notify the local Fire Department identified in Section IV. Emergency Contacts, i.e., Tice Fire District, and seek its assistance and will also notify the local government (City of Ft. Myers and/or Lee County Emergency Management) and any neighbors likely to be affected by the fire.

HAZARDOUS MATERIAL SPILL

In the event of a hazardous material spill, including petroleum or other regulated substance as identified in Chapter 62-761, Florida Administrative Code (F.A.C.), is discovered at the CDDRF, the following notification procedures will be followed:

- The individual discovering the spill should notify the CDDRF Operator via cellular phone provided for communication at the site. In the absence of the CDDRF Operator, the individual will notify the Solid Waste Division office and/or the Solid Waste Division Director at the number(s) provided in the Emergency Contacts section below.
- If the spill is a small quantity of a known substance, e.g., oil or diesel fuel, and the spill does not reach a pervious surface such as soil or a storm water pond or swale, the procedures for responding to a small spill of petroleum or other non-hazardous substance identified in Section V. Emergency Response Procedures will be followed and no additional notifications are required.
- If the spill is significant or reportable as defined in the Emergency Response Procedures, notification will be made to the local fire department, Department, the State Warning Point, and the National Response Center at the numbers provided in the Emergency Contacts section below.

NATURAL DISASTERS

In the event of natural disasters such as a hurricane or flood, notification to emergency response persons/agencies is not typically necessary because these persons/agencies will already be aware of any natural disaster which will not be isolated to the facility. The CDDRF will have already been prepared for the impending disaster and will likely be closed until after the hurricane and/or until the flood subsides. Preparation procedures for impending natural disasters will be the focus of the Solid Waste Division Director. These

procedures are discussed briefly in the Emergency Response Procedures section of this Contingency Plan.

If a severe storm or tornado is in the vicinity of or approaching the CDDRF, the general emergency notification procedures outlined above should be implemented.

IV. EMERGENCY CONTACTS

Contact information for emergency response persons/agencies are listed below:

CDDRF Operator:	TBA
Solid Waste Division Office:	(239) 533-8000
Solid Waste Division Director:	(239) 533-8000
Control Room:	(239) 337-2200
Fire Department:	Tice Fire District (station #3) 5850 Buckingham Road, Ft. Myers, 33905 (239) 694-2380
FDEP Fort Myers Office:	(239) 332-6975 (normal business hours) (800) 413-9911 (outside normal hours)
State Warning Point:	(800) 320-0519
National Response Center:	(800) 424-8802
Poison Control Center	(800) 222-1222
Lee County Department of Environmental Health	(239) 332-9501

Sheriff (239) 477-2800

Lee County
Emergency Management (239) 477-3600

City of Ft. Myers
Public Works (239) 321-7608 (24 hours)

V. EMERGENCY RESPONSE PROCEDURES

Emergency Response Procedures are prepared as a safety measure to ensure prompt response to emergency situations and to mitigate their consequences. The specific procedures to be followed in a given situation depend upon the type of emergency that has occurred. Specific procedures are given in the following subsections for each type of emergency.

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FIRE

In the event of a fire at or near the CDDRF, the following procedure should be followed:

- If the fire is small, the CDDRF Operation should attempt to extinguish the fire using the fire extinguisher provided at the site. A list of all emergency response equipment, their locations, and general instructions for their use are provided in the Emergency Equipment section below.
- If the fire cannot be extinguished or is immediately identified as significant, notification to the Fire Department via 911 or at the number listed above will be made as indicated above under 'Notification Procedures' and individuals at or near the site should move away from the fire and await the arrival of the Fire Department.
- If the fire cannot be extinguished or controlled within 48 hours, the notification procedures outlined in Section III of this Contingency Plan will be implemented and the response procedures outlined herein will be implemented;

- In the case of a fire in the waste or in a waste pile at the CDDRF, the procedures outlined in Section III of this Contingency Plan will be implemented;
- The individual at the Solid Waste Division responding to the emergency call should notify the Florida Department of Environmental Protection. A list of all emergency contacts and phone numbers is provided in 'Emergency Contacts'.

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Within two weeks of the occurrence of the fire, the Lee County Solid Waste Division should submit to the Florida Department of Environmental Protection a written report on the fire. This report should describe the origins of the fire, the actions that were taken, the results, and an analysis of the success or failure of the actions.

PETROLEUM/HAZARDOUS MATERIAL SPILLS

There are two types of petroleum or hazardous material spills:

- Reportable Quantities; and
- Non-Reportable Quantities

The difference between the above types of spills is that reportable quantities must be reported to the Department and non-reportable quantities are not required to be reported to the Department.

A reportable spill is defined as:

- Any quantity of petroleum, petroleum product or other regulated substance that is visually observed in soil or surface water;
- A spill or overfill of petroleum or regulated substance to soil, equal to or exceeding 25 gallons;
- A spill or overfill of petroleum or a regulated substance to an impervious surface exceeding 100 gallons; or
- A spill or overfill of petroleum or a regulated substance to a secondary containment, e.g., for a tank, exceeding 500 gallons.

Regardless of whether a fuel/petroleum spills is reportable or note, the spill must be address immediately by following the procedures below.

- Minor spills (typically less than 25 gallons), although not reportable, should still be addressed immediately by using absorbent materials to absorb the petroleum. A spill kit will be located near the processing equipment in case of a fuel or hydraulic oil leak or spill. Alternatively, mulched yard waste from the Horticulture Processing and Recycling Facility located west of the CDDRF may also be used as an absorbent. The CDDRF Operator should use the absorbent materials provided and spread onto the spill. Once all the petroleum product has been absorbed the adsorbents should be placed in a water tight container for proper disposal. The spill clean up material may be temporarily stored with the non-hazardous unauthorized material until removed for disposal at the SWERF or may be taken directly to the SWERF tipping floor for disposal.
- Major spills, while reportable to the Department, should still be contained and absorbed to the extent possible using the same absorbents and procedures as those referenced above.
- The Solid Waste Division Director or his designee will assess the extent of the spill and will arrange for the appropriate clean up contractor or utilize Division equipment to clean up the spill, including contaminated soil if any and will dispose in accordance with direction from the Department.
- The Solid Waste Division Director or his designee will perform the required regulatory notifications.

NATURAL DISASTERS

In the event of an impending natural disaster such as a hurricane, flood, or severe storm, emergency response procedures include preparing for the event and, afterward, assessing damage, if any, and repairing damaged equipment. The following procedures will be implemented in sufficient time before the hurricane makes landfill:

- At the appropriate time before the storm or hurricane makes landfill and if directed by the Solid Waste Division Director, the CDDRF Operator will close the CDDRF to prepare for the hurricane.
- All unprocessed C&D will be transferred to the appropriate facility at the SWERF, e.g., Transfer Station or SWERF, and the processing equipment will be secured.
- To the extent practical, all processed material will be transferred to the appropriate facility and/or will be secured.
- After the hurricane passes and it is safe to do so, the CDDRF Operator will return to the facility and assess any damage that may have occurred. If the processing equipment is damaged to the extent it is inoperable, the Division Director will notify regular customers that the facility will be closed until further notice.

VI. PROCEDURES FOR FACILITY SHUT-DOWN

If any of the emergencies outlined above require the CDDRF to immediately shut-down, the following procedures will be implemented.

- Any remaining unprocessed C&D will be transferred to the appropriate facility, e.g., the SWERF or the County's Class III Landfill located at the Lee/Hendry Landfill in Hendry County.
- Unprocessed material will be transferred to the appropriate facility for recycling or disposal.
- Due to the CDDRF location at the SWERF, notification to customers is not necessary because the SWERF may continue to accept C&D at the SWERF or at the Solid Waste Transfer Station where the C&D will be

transferred to the Class III Landfill located at the Lee/Hendry Landfill in Hendry County. Alternatively, the C&D may be sorted and recyclable removed for recycling and non-recyclables will be disposed at the SWERF or the Class III Landfill.

VII. PROCEDURES FOR NOTIFYING AFFECTED NEIGHBORS AND/OR LOCAL GOVERNMENTS

The CDDRF is sufficiently isolated from surrounding neighbors due to its location within the SWERF campus; therefore, the affects of the emergency on neighbors will be negligible. The Solid Waste Division Director will assess the affects of the emergency and will take steps necessary if notification to other local governments, i.e., City of Ft. Myers, is warranted by the impacts of the emergency.

VIII. EMERGENCY RESPONSE EQUIPMENT

The following emergency response equipment is available at the CDDRF and may be used in response to an emergency. As appropriate, instructions for use of the equipment are provided below the equipment listing.

Fire Extinguisher

Spill Clean-up Kit (oil dry)

Safety Glasses

First Aid Kit

Fire hydrants are located at the south perimeter of the CDDRF and can be utilized as needed in the event of a fire necessitating the use of the hydrants. Fire hoses can be attached to hydrants providing fire protection to the site, if necessary. In addition, equipment is available from the SWERF operation, including front-end loader(s), to assist in emergency situations.

Instructions for Use:

Fire Extinguisher

Pull the pin at the top of the extinguisher. The pin releases a locking mechanism and will allow you to discharge the extinguisher.

Aim at the base of the fire, not the flames. This is important - in order to put out the fire, you must extinguish the fuel.

Squeeze the lever slowly as this will release the extinguishing agent in the extinguisher. If the handle is released, the discharge will stop.

Sweep from side to side using a sweeping motion, move the fire extinguisher back and forth until the fire is completely out. Operate the extinguisher from a safe distance, several feet away, and then move towards the fire once it starts to diminish. Be sure to read the instructions on your fire extinguisher - different fire extinguishers recommend operating them from different distances. Remember: Aim at the base of the fire, not at the flames!!!!

Appendix D - Ground Water Monitoring Program

Groundwater Monitoring Plan
Lee County Construction and Demolition Debris Facility

This Ground Water Monitoring Plan was developed by the Lee County Solid Waste Division (SWD) to summarize the ground water monitoring program to be implemented at the proposed Lee County Construction and Demolition Debris Facility (CDDRF) to be located at the Solid Waste Energy Recovery Facility (SWERF) in Fort Myers.

Ground Water Monitoring Well Network

In accordance with Rule 62-701.730(4)3, FAC., the monitoring well network will consist of 1 upgradient and 2 downgradient wells chosen from the SWERF's existing ground water monitoring well network. Specifically, the three (3) wells that will comprise the ground water monitoring well network for the CDDRF include the following:

WTE-2S will serve as the upgradient well;
WTE-3SR (replacement) and WTE-4S will serve as the downgradient wells;

Note that, at the present time, the existing ground water monitoring well cluster WTE-3S/3D is located in the footprint of the proposed CDDRF. The SWD proposes to move the WTE-3S/3D well cluster to the location shown on Figure 1 attached to this Ground Water Monitoring Plan. The proposed new location for well WTE-3S (or WTE-3SR in its new location) is suitable for this well to serve as one of the two (2) required downgradient detection wells for the CDDRF. The proposed new location for the WTE-3SR/3DR well cluster will also continue to effectively serve as a downgradient detection well for the SWERF.

Although both WTE-3SR and WTE-3DR are shown on Figure 1 in the proposed new location, the SWD believes that only WTE-3SR in the location shown will be necessary, and, as such, plans to request Department approval to eliminate the deep wells from the SWERF's Groundwater Monitoring Program. The SWD is currently preparing a request for Department approval of a revised SWERF Groundwater Monitoring Program. The request will include justification for eliminating the deep wells and include modifications to the monitoring frequency and parameters to more closely match the ground water monitoring requirements for C & D Recycling and other Solid Waste Facilities.

Ground Water Sampling and Analyses

Ground water samples will be collected from the above-noted wells on a semi-annual frequency and the samples will be analyzed for the parameters listed in F.A.C. Rule 62-701.730(4)(b) which include the following:

Field Parameters	Lab Parameters	Lab Parameters	Lab Parameters
pH	Aluminum	Arsenic	Xylenes
Turbidity	Chlorides	Cadmium	Those parameters in
Temperature	Nitrate	Chromium	EPA 601 & 602
Specific Conductivity	Sulfate	Lead	
Dissolved Oxygen	TDS	Mercury	
Water Elevations	Iron	Total Ammonia – N	
Colors/Sheens (visual)	Sodium		

In accordance with Specific Condition H.2.c.(6) of Section B.I. of the modified Conditions of Certification (COC) dated March 22, 2010, the ground water monitoring program may be reviewed annually. In the event that the CDDRF receives a significant volume of 'Chinese' drywall, the ground water monitoring program may be modified to add the laboratory parameters Strontium and Boron to those parameters listed above as identified in F.A.C. Rule 62-701.730(4)(b).

Sampling will be conducted in accordance with the Department's Standard Operating Procedures, DEP-SOP-001/01, and specifically in accordance with FS 2200, Ground Water Sampling. Laboratories selected to perform environmental sampling and analyses required by Department permits or rules will hold a valid certification from the Department of Health's Environmental Lab Certification Program as required by Chapter 62-160, FAC. All field and laboratory records will be made available to the Department.

Ground Water Monitoring Reports

Semi-annual water quality monitoring reports will be prepared in accordance with Rule 62-701.510, FAC, and submitted to FDEP as required. The report will include the information listed in Rule 62-701.510 (9)(a), FAC. A technical report, prepared and signed by a professional engineer or geologist with experience in hydrogeological investigations, will be submitted to the Department as required by 62-701.510(9)(b), FAC. The report will contain a summary of all water level and water quality data collected in the previous 2 ½ years plus, at a minimum, all information listed in Chapter 62-701.510 (9)(b), FAC.

Ground Water Monitoring Well Installation and Abandonment

The following procedures will be implemented for the installation and/or abandonment of ground water monitoring wells at the SWERF, including replacement well WTE-3SR (and WTE-3DR if required) (where 'R' denotes a replacement well) and the abandonment of the existing wells WTE-3S and WTE-3D once approved by the Department.

The LCSWD will hire a Licensed Well Driller to install any new or replacement wells and/or abandon any wells as needed. The Well Driller will secure the required well construction and abandonment permits prior to the installation of any new wells, e.g., WTE-3SR, and prior to abandoning any existing wells, e.g., WTE-3S and WTE-3D.

The wells will be installed in general accordance with ASTM D-5092, Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers, and in accordance with the Department's Bureau of Petroleum Storage Systems Petroleum Cleanup Program's Standard Operating Procedures PCS-006 for the Design, Installation and Placement of Monitoring Wells.

The wells will be fully developed in accordance with procedures outlined in the above-referenced documents. The existing wells will be properly abandoned in accordance with the procedures in the above-referenced documents which generally consist of grouting from the bottom up using a tremie pipe.

A boring log and a Well Construction and Development Log (provided in PCS-006) will be completed for each well installed. A Department Monitor Well Completion Report (DEP Form # 62-522.900(3) will also be completed and submitted for each well installed.

REGIONAL MAP
NOT TO SCALE

0 200 400 600

SCALE IN FEET
1" = 200'

(FOR SCALING DWG MUST BE PLOTTED ACCORDING TO LAYOUT AT 24X36 REDUCED SIZE NOT TO SCALE

SYMBOLS

- DENOTES FOUND REBAR & CAP LB. 3664
- BARBED WIRE FENCE AS SCALED FROM SURVEY
- DENOTES FOUND CONCRETE MONUMENT LB. 3664
- DENOTES FOUND CONCRETE MONUMENT
- GROUNDWATER MONITORING WELLS

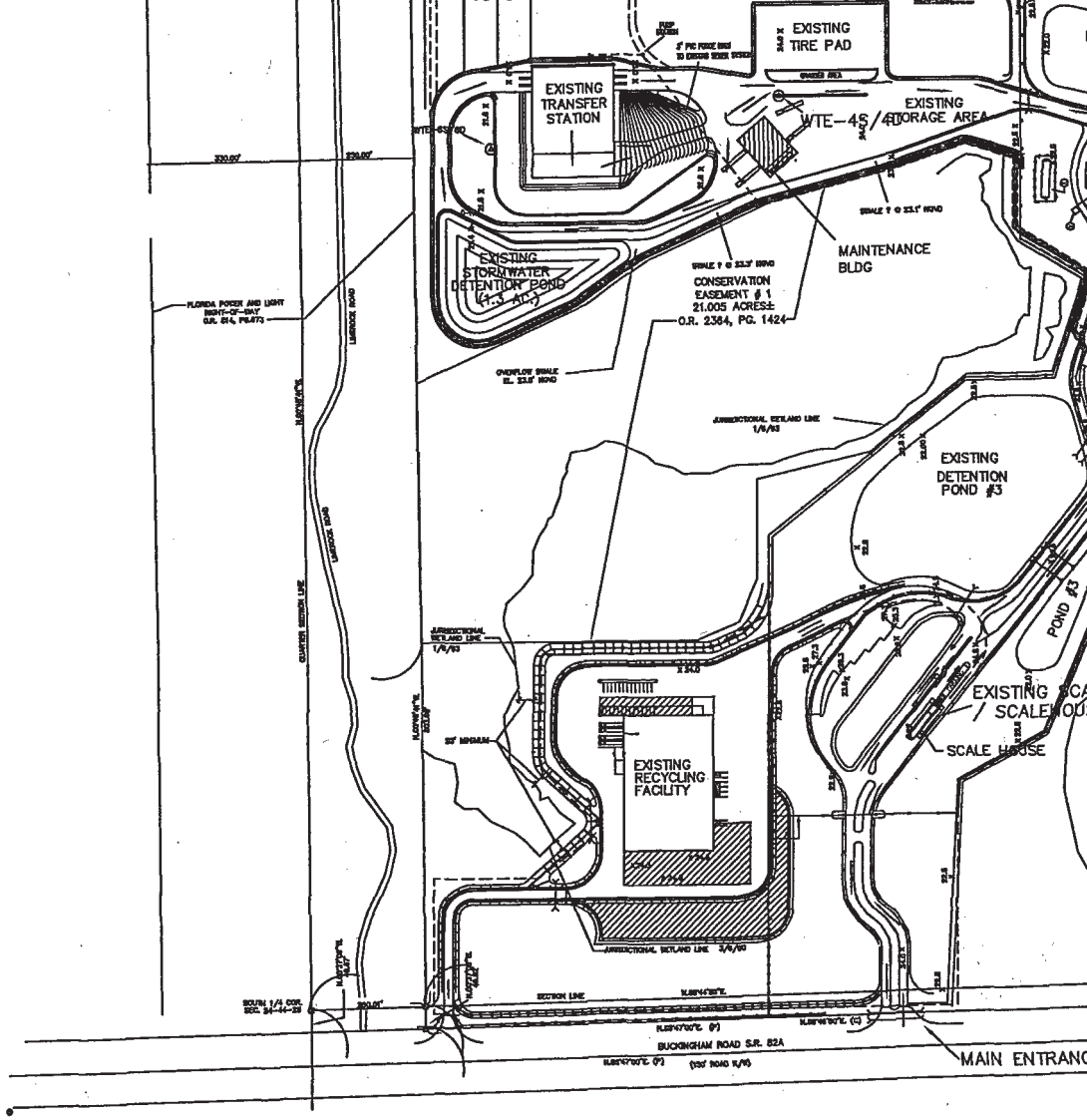
LEGEND:

T.	TOWNSHIP
R.	RANGE
LB	LICENSED BUSINESS
(C)	CALCULATED
(S)	DIMENSION AS SHOWN ON SURVEY
(P)	PLAT
FD	FOUND
COR	CORNER
S.R.	STATE ROAD
MON	MONUMENT
ELEV.	ELEVATION
M.W.	MONITORING WELL

NOTES:

1. ELEVATIONS SHOWN (IF ANY) ARE BASED ON NATIONAL GEODETIC VERTICAL DATUM. (N.G.V.D.) US GEOLOGICAL SURVEY BENCHMARK "51 WTM 1952" SURVEYOR'S NOTES
2. SURVEY BASED ON FOUND MONUMENTATION AS ESTABLISHED BY OTHERS. REFERENCE IS MADE TO A BOUNDARY SURVEY OF PART OF SECTIONS 24 AND 25, TOWNSHIP 44 SOUTH, RANGE 25 EAST, PERFORMED BY AGNOLI, BARBER & BRUNDAGE, INC., AND DATED JUNE 22, 1990, WHICH WAS PREV. PROVIDED TO DEPT.
3. CDDRF GROUNDWATER MONITORING WELLS TO CONSIST OF WTE-2S (UPGRADIENT) & WTE-3S & WTE-4S (DOWNGRADIENT/DETECTION).
4. GWM WELLS WTE-3S AND WTE-3D WILL BE RELOCATED AS SHOWN TO ACCOMMODATE THE CDDRF.

* BASE PLAN PROVIDED BY MALCOLM PIRNIE MODIFIED BY LEE COUNTY SOLID WASTE DIVISION



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REVISIONS			
NO.	BY	DATE	REMARKS
1	MSA	2/2009	PROPOSED ADDITIONS FACILITY SITE LAYOUT
2	MSA	3/2010	PROPOSED CDDRF FACILITY

DES RHF
DWN CCT
CKD RHF

LEE COUNTY SOLID WASTE DIVISION
FORT MYERS, FL 1971-036

LEE COUNTY SOLID WASTE
ENERGY RECOVERY FACILITY (SWERF)

Appendix E - Copy of SWERF Boundary Survey
(For Reference-Original Provided Previously to Department)

DRAWINGS
ON
ATTACHED
PDF DOCUMENT
IN
OCULUS
UNDER SAME
INDEXING INFORMATION

Appendix F - Department Email Correspondence Pertaining to the SWERF Storm Water Management System

Sampson, Lindsey

From: Mulkey, Cindy [Cindy.Mulkey@dep.state.fl.us]
Sent: Thursday, September 03, 2009 5:10 PM
To: Sampson, Lindsey
Cc: Halpin, Mike; Myers, Jack D.; Poulos, Arielle; Reade, Jesse; Gillen, Elizabeth; Landers, Randal
Subject: Lee Co RRF Post Cert Submittal

Lindsey,

The DEP South District Office has completed its review of the stormwater management plan calculations that were submitted by you to the Siting Office on June 15, 2009, and the additional information submitted on August 13, 2009. The calculations reflect the expansion of the Recovered Materials Processing Facility, the addition of the Vehicle Maintenance Facility, and the C&D Recycling Facility.

According to the DEP SD Office, there are no wetland issues associated with the expansions and the existing stormwater management system (with minor modifications to the stormwater runoff routing via some swales and interconnecting piping) has been shown by Lee County's Consultant to be sufficient for the proposed work.

This email serves as approval of your post-certification submittal.

Cindy

Cindy Mulkey
Engineering Specialist
Department of Environmental Protection
Siting Coordination Office
M Station 48
3900 Commonwealth Blvd.
Tallahassee, Florida 32399
Phone: 850-245-2175
FAX: 850-245-2020

From: Sampson, Lindsey
Sent: Monday, June 15, 2009 7:04 PM
To: 'Mulkey, Cindy'
Subject: Lee County Conds of Cert, Amended Application & Modification Submittal

Cindy,

Attached please find the cover letters for the new "Storm Water Management Plan" Calculations, and the electronic file of the Plan/Calculations themselves.

Good talking to you again today.

Lindsey J. Sampson
Lee County Solid Waste Division
sampsolj@leegov.com
Ph 239-533-8000
Fax 239-461-5871

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you re ed. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

Attachment 4

Topographic map of CDDRF

DRAWINGS
ON
ATTACHED
PDF DOCUMENT
IN
OCULUS
UNDER SAME
INDEXING INFORMATION

Addendum to the RAI Response

1. Approximate Capacities of Storage Areas and
   C & DD Composition Estimate – Type and Volume

Attachments to the RAI Response

1. Excerpt from COC (Section B., K)
2. Revised Cover Sheet
3. Revised SWERF Site Plan
4. Topographic map of CDDRF
5. Revised CDDRF Site Plan
6. Revised Additional Information document with revisions highlighted; includes Figure 1-Plan and Profile of Sorting/Processing Equipment and Attachment 1-Financial Assurance Documents (Financial Test) for Lee County Solid Waste Division's three landfills. The Financial Test demonstrates Lee County has sufficient financial resources to cover negligible incremental cost to close CDDRF. The Sections/Items of the Additional Information document that were revised in response to RAI comments include Item 10, Closure Plan and Item 14, Enforcement History. Other Items were revised as an indirect result of RAI comments.
7. Revised Operations Plan with revisions highlighted; includes a new Contingency Plan as Attachment 1. The Sections of the Operations Plan that were revised in response to RAI comments include Section 5.2 and 5.3 for the description of unauthorized waste and procedures for handling hazardous waste when encountered. Other Sections were revised as an indirect result of RAI comments.
8. Revised Ground Water Monitoring Plan; includes two versions-one with revisions highlighted and the other with the revisions incorporated.
9. Revised Additional Information document with revisions incorporated (Cover page and Attachments and/or Figures, etc. are provided in Attachment 6).
10. Revised Operations Plan with revisions incorporated (Cover page and Attachments and Figures, etc. are provided in Attachment 7).

Addendum 1 to the RAI Response

Approximate Capacities of Storage Areas

And

C & DD Composition Estimate – Type and Volume

Lee County Construction and Demolition Debris Recycling Facility

C & DD Composition Estimate - Type and Volume

Per Study done by the State University System of Florida; Florida Center for Solid and Hazardous Waste Management

Generation and Composition of Construction and Demolition Waste in Florida
31-Dec-02

The composition by weight of various C & D debris used in the calculations below was obtained from the above-noted study and applied to the projected C & DD quantity that will be received at the CDDRF in 2010 to arrive at quantity of each type of material

2010 projected quantity of C & D to CDDRF was 200 tons per day
Quantities below are per day

Material	% by Weight	Weight (tons)	Field Measured Density (lb/cy)	Projected Volume (cy/day)
Concrete	54.2	108.4	1567	138.35
Wood	13.6	27.2	220	247.27
Drywall	11.4	22.8	339	134.51
Roofing	6.9	13.8	514	53.70
Metal	2.8	5.6	236	47.46
Misc.	11.2	22.4	587	76.32

Lee County Construction and Demolition Debris Recycling Facility

Approximate Capacities of Storage Areas

(Storage area descriptions correspond to those shown/labeled on CDDRF Site Plan and/or Plan and Profile of C&D Debris Material Recovery Facility)

Storage Area Description	Approx. Dimensions (sf)	No. of Areas	Capacity (CY)
Processed Material Stockpiles	55' x 30'	4	3667
Residue Storage/Staging Area	65' x 80'	1	2889
C&DD Tipping/Screening Area	75' x 130'	1	5417
Additional Recyclables/Non-Recyclables Storage Area	320' x 25'	1	4444
Bunkers (under Processing Equip.)	13' x 54'	6	2340
Larger Bunker/Spare	18' x 54'	1	540
Unauthorized Waste Storage Area	50' x 10'	2	556
Total			19852

Capacity/volume above based on storage height of 15 feet

Attachment 1

Excerpt from COC (Section B., K)

STATE OF FLORIDA

DEPARTMENT

OF

ENVIRONMENTAL PROTECTION

Conditions of Certification

Lee County

Solid Waste Energy Recovery Facility

PA90-30H

March 22, 2010

Chapter 62-730. Disposal of Grade III Domestic Wastewater Treatment Sludge, disposal of domestic septage, and disposal of food service sludge, shall be in accordance with F.A.C. Chapter 62-701.

I. Proprietary Documents or Information - Confidentiality

Proprietary or confidential data, documents or information submitted or disclosed to any agency shall be identified as such by the Licensee and shall be maintained as such pursuant to applicable Florida law.

J. Transmission Lines

The directly associated transmission lines from the SWERF electric generators to the existing Florida Power & Light substation shall be cleared, maintained, and prepared without the use of herbicides.

K. Construction & Demolition Debris Recycling Facility (CDRF)

Prior to construction and operation of the CDRF, Lee County shall submit a completed application form No. 62-701.900(4), (excluding those portions previously submitted for this project), including supporting data for the District's review and approval. Review of this post-certification submittal shall be in accordance with Section A, Condition XIX, Procedures for Post-Certification Submittals and shall include all portions of form 62-701.900(4).

II. SOUTH FLORIDA WATER MANAGEMENT DISTRICT

A Legal/Administrative Conditions

1. General

a. Responsible Entity

The Licensee, defined as Lee County or any full-service vendor/contractor under contract to the County, shall be responsible for the implementation of the Certification Conditions. If contractual rights, duties, or obligations are transferred under this Certification, notice of such transfer or assignment shall immediately be submitted to the Florida Department of Environmental Protection and the SFWMD by the previous certification holder (Licensee) and the Assignee. Included in the notice shall be the identification of the entity responsible for compliance with the Certification. Any assignment or transfer shall carry with it the full responsibility for the limitations and conditions of this Certification. Reference: Sections 373.223 and 373.413, F.S.; Rules 40E-2.091(1)(a), 40E-2.301, 40E-2.381(1), 40E- 4.091(1)(a), and 40E-4.301, F.A.C.

b. Minimum Standards

This Certification is based on the Licensee's submitted information to the SFWMD which reasonably demonstrates that adverse off-site water resource related impacts will not be caused by the authorized activities. The plans, drawings and design specifications submitted by the Licensee shall be considered the minimum standards for compliance. Reference: Sections 373.219, 373.223, 373.229, 373.308, 373.316, 373.413(1) and 373.416(1), F.S.; Rules 40E-2.091(1)(a), 40E-2.301(1), 40E-2.381, 40E-3.500-531, 40E-4.091(1)(a), 40E-4.301(1), and 40E-4.381, F.A.C.

c. Compliance Requirements