



Florida Department of Environmental Protection

South District
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Fort Myers, Florida 33902-2549
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Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan Matthews
Interim Secretary

September 22, 2017

Keith Howard, P. E., Director
Lee County Solid Waste Division
10500 Buckingham Road
Fort Myers, FL 33905
Email: khoward@leegov.com

Re: In Compliance Letter
Lee County Resource Recovery Facilities
WACS Id. No., 93715
Lee County

Dear Mr. Howard,

Department personnel conducted a compliance inspection of the above-referenced facility on August 23, 2017. Based on the information provided during the inspection the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Rick Roudebush at 239/344-5653 or via e-mail at: rick.roudebush@dep.state.fl.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Snyder", is written over a light blue horizontal line.

Ryan Snyder
Environmental Manager
Compliance Assurance Program
South District
Florida Department of Environmental Protection

RS/rrr



**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: LEE COUNTY RESOURCE RECOVERY FACILITY

On-Site Inspection Start Date: 08/23/2017

On-Site Inspection End Date: 09/05/2017

WACS No.: 93715

Facility Street Address: 10500 BUCKINGHAM ROAD

City: FORT MYERS

County Name: LEE

Zip: 33905

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Rick R Roudebush, Environmental Specialist

Other Participants: Renee Kwiat, Environmental Consultant; Katie O'Gara, Environmental Specialist; Laura Gray, Engineering Manager; Rebecca Rodriguez, Engineering Manager

INSPECTION TYPE:

Routine Operation Inspection for WPF - Source-Separated Organics Proc Fac (SOPF)

Routine Operation Inspection for Other - Waste Tire Collection Center

Routine Operation Inspection for WPF - Waste To Energy Facility

Routine Operation Inspection for WPF - Material Recovery Facility - C&D

ATTACHMENTS TO THE INSPECTION CHECK LIST:

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

1.0 - SECTION 1.0 - FILE REVIEW

4.0 - SECTION 4.0 - WASTE PROCESSING FACILITIES

10.0 - SECTION 10.0 - REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES

12.0 - SECTION 12.0 - WTE FACILITIES

Inspection Date: 08/23/2017

1.0 - SECTION 1.0 - FILE REVIEW

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	FILE REVIEW (Pre- or Post-Inspection, as appropriate.)	Ok	Not Ok	Unk	N/A
1.1	For landfills and C&D disposal facilities, does the facility have a current plan for the method and sequence of filling wastes? 62-701.500(2)(f) for landfills; 62-701.730(7)(a) for C&D debris sites				✓
1.2	For landfills, are the following records being reported to the Department?(Check any that are Not OK) <input type="checkbox"/> Waste reports (annually) 62-701.500(4) <input type="checkbox"/> Annual estimate of remaining life 62-701.500(13)(c)				✓
1.3	Is gas monitoring being performed as required by the permit? 62-701.500(9), 62-701.530(2)				✓
1.4	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)(c)				✓
1.5	Is water quality sampling and testing performed according to standard procedures and at the required frequencies? 62-701.510(2) for landfills; 62-701.730(8) and 62-701.730(10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.	✓			
1.6	Do the results of the water quality testing suggest there may be adverse impacts to water quality from the operation of the solid waste facility? 62-701.510(3) and (4); 62-701.730(4)(c) and (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.	✓			
1.7	For closed landfills and C&D disposal facilities with final elevations higher than 20 feet above grade, has a final survey report verifying the final elevations and contours of the facility been submitted to the Department? 62-701.600(6)(b), 62-701.730(9)(e)				✓
1.8	Is financial assurance adequate? 62-701.630 for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(a) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities. NOTE: The Solid Waste Financial Coordinator in Tallahassee can assist with this information.	✓			
1.9	Are cost estimates current and adjusted every year? 62-701.630(4) for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(b) and 62-713.600(6)(c) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities.	✓			
1.10	For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by February 1st of each year? 62-701.730(12)	✓			
1.11	For C&D recycling facilities with no disposal, is an Annual Report for the recycling facility submitted to the Department by February 1st of each year? 62-701.710(8)(b)	✓			
1.12	For compost facilities, has the compost product been sampled and analyzed every 20,000 tons or every 3 months (whichever is sooner)? 62-709.530(1)				✓
1.13	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				✓

Inspection Date: 08/23/2017

4.0 - SECTION 4.0 - WASTE PROCESSING FACILITIES

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18))	Ok	Not Ok	Unk	N/A
4.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a)	✓			
4.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
4.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
4.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event.) 62-701.300(2)(d)	✓			
4.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
4.5	Unauthorized open burning of solid waste prohibited, except in accordance with Department requirements? 62-701.300(3)	✓			
4.6	Are the following unauthorized wastes or special wastes properly managed? (Check any that are Not OK) <input type="checkbox"/> Hazardous waste 62-701.300(4) <input type="checkbox"/> Biomedical waste 62-701.300(6) <input type="checkbox"/> Used oil and oily wastes, except as exempted 62-701.300(11) <input type="checkbox"/> PCB wastes 62-701.300(5) <input type="checkbox"/> Liquids 62-701.300(10)	✓			
Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
4.7	For areas not enclosed, is litter controlled and are litter control devices maintained? 62-701.710(3)(a)	✓			
4.8	Is leachate collection and removal system maintained and operated as required? 62-701.710(3)(b)				✓
4.9	Are all drains and leachate conveyances kept clean so that leachate flow is not impeded? 62-701.710(4)(g)				✓
4.10	Are the following records or plans current and available on-site? (Check any that are Not OK) <input type="checkbox"/> Operation Plan 62-701.710(2)(e) <input type="checkbox"/> Contingency Plan 62-701.710(2)(g) <input type="checkbox"/> Operation records 62-701.710(8)(a)	✓			
4.11	Is the Operation Plan substantially followed? 62-701.710(4)(a)	✓			
4.12	Are putrescible wastes stored no longer than 48 hours or as otherwise allowed in the Operation Plan? 62-701.710(4)(b)	✓			
4.13	Are the operating hours posted at the facility? 62-701.710(4)(c)1	✓			
4.14	Is a trained operator on duty whenever the facility is operating? 62-701.710(4)(c)1	✓			

Inspection Date: 08/23/2017

Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
4.15	Is at least one trained spotter on duty at all times that waste is received at the facility to inspect the incoming waste, unless exempt under 62-701.710(1)(d)1? 62-701.710(4)(c)2	✓			
4.16	Are unauthorized wastes removed from the waste stream and placed into appropriate containers for disposal at a permitted facility? 62-701.710(4)(c)2	✓			
4.17	Is the facility operated to control objectionable odors? 62-701.710(4)(d)	✓			
4.18	Is adequate fire protection equipment available and operational? 62-701.710(4)(e)	✓			
4.19	Is access to the facility controlled by fencing or other effective barriers to prevent disposal of unauthorized solid waste? 62-701.710(4)(f)	✓			
4.20	If the facility is a Transfer Station and is claiming the financial assurance exemption, does it manage the waste on a first-in, first-out basis and store waste for no greater than 7 days? 62-701.710(1)(d)1	✓			
4.21	Are all additional specific conditions (not otherwise addressed above) in the permit, Department order, or certification, if any, being followed? 62-701.320(1), 403.161, F.S.	✓			
4.22	If the facility has reached its permitted capacity for storage of wastes or recyclable materials, has the permittee stopped accepting additional waste for processing? 62-701.710(4)(i)	✓			
Item No.	WASTE PROCESSING FACILITY CLOSURE	Ok	Not Ok	Unk	N/A
4.23	Has the solid waste or residue been properly disposed of within 30 days after receiving the final solid waste shipment? 62-701.710(6)(b)	✓			
4.24	Has closure been completed within 180 days after receiving the final solid waste shipment? 62-701.710(6)(c)	✓			

Inspection Date: 08/23/2017

10.0 - SECTION 10.0 - REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES

Requirements:

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FACILITY TYPE(S) **MATERIAL(S) PROCESSED** **PRODUCE(S)** **METHOD OF COMPOSTING**

Yard Trash Transfer Station Yard Trash Mulch Passive aerated windrows

Other

Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ALL REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES	Ok	Not Ok	Unk	N/A
10.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted or registered solid waste management facility or other exempt facility? 62-701.300(1)(a)	✓			
10.2	Have objectionable odors been caused or allowed in violation of Chapter 62-296, F.A.C.? 62-709.300(7)(a)	✓			
10.3	Unauthorized storage or processing in a way or location that violates air quality or water quality standards? 62-709.300(7)(b), 62-701.300(1)(b)	✓			
10.4	Do geological formations or subsurface features provide support for the facility? 62-709.300(7)(b), 62-701.300(2)(a)	✓			
10.5	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e), 62-709.320(3)	✓			
10.6	Unauthorized storage or processing in any natural or artificial water body (e.g. ground water and wetlands within DEP jurisdiction)? 62-709.300(7)(b), 62-701.300(2)(d)	✓			
10.7	Unauthorized storage or processing on the right of way of any public highway, road, or alley? 62-709.300(7)(b), 62-701.300(2)(f)	✓			
10.8	Unauthorized open burning of solid waste except in accordance with Department requirements? 62-709.300(7)(b), 62-701.300(3)	✓			
10.9	Unauthorized incorporation of CCA treated wood into material that will be applied as a ground cover, soil or soil amendment? 62-709.300(7)(b), 62-701.300(14)	✓			
10.10	Unauthorized unconfined emissions of particulate matter in violation of paragraph 62-296.320(4)(c), F.A.C.? 62-709.300(7)(b), 62-701.300(15)	✓			
10.11.1	Effective barrier to prevent unauthorized entry and dumping? 62-709.320(2)(a)1	✓			
10.11.2	Dust and litter control methods? 62-709.320(2)(a)2	✓			
10.12.1	20-foot all-weather access road all around the perimeter? 62-709.320(2)(a)3.a.	✓			
10.12.2	No material mechanically compacted? 62-709.320(2)(a)3.b.	✓			
10.12.3	No material more than 50 feet from access by motorized firefighting equipment? 62-709.320(2)(a)3.c.	✓			
10.13	Is the facility operated in a manner to control vectors? 62-709.320(2)(b)	✓			
10.14	Is the facility operated in a manner to control objectionable odors per with Rule 62-296.320(2), F.A.C.? 62-709.320(2)(c)	✓			
10.15	Are any installed drains and leachate or condensate conveyances kept cleaned? 62-709.320(2)(d)	✓			
10.16.1	Is yard trash size-reduced or removed within 6 months or time needed to receive 3,000 tons or 12,000 cubic yards, whichever is greater? (Separated logs with 6 inch diameter or greater can be stored for up to 12 months before being size-reduced or removed.) 62-709.320(2)(e)1	✓			

Inspection Date: 08/23/2017

Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ALL REGISTERED SOURCE-SEPARATED ORGANICS PROCESSING FACILITIES	Ok	Not Ok	Unk	N/A
10.16.2	Is putrescible waste (e.g. vegetative wastes, animal byproducts or manure) processed and incorporated into the composting material, or removed from the facility, within 48 hours? 62-709.320(2)(e)2	✓			
10.17	Is any treated or untreated biomedical waste; hazardous waste; or any materials having (PCB) concentration of 50 ppm or greater containerized and removed immediately? 62-709.320(2)(f), 62-701.300(4), 62-701.300(5), 62-701.300(6)	✓			
10.18	Have all residuals, solid waste and recyclable materials been removed and recycled or disposed and has any remaining processed material been properly used or disposed upon the facility ceasing operations? 62-709.320(2)(g)	✓			
10.19	If temperature is used to show disinfection or vector attraction achieved, are records kept for at least three years? 62-709.320(4)(b)				✓
10.20	Is the registration for the facility current and on file with the Department? 62-709.320(3)(b)	✓			
10.21	Are renewal applications for annual registration of the facility submitted to the Department by July 1st, if applicable? 62-709.320(3)(c)	✓			
10.22	Are monthly records of incoming and outgoing material kept on-site or at another location as indicated on the registration form for at least three years? 62-709.320(4)(a)	✓			
10.23	Are Annual Reports, based upon the preceding calendar year, summarizing monthly records, submitted to the Department as required? 62-709.320(4)(a)	✓			
Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO YARD TRASH ONLY FACILITIES	Ok	Not Ok	Unk	N/A
10.24	Unauthorized storage or processing within 100 feet from off-site potable water well that existed before facility registered? 62-709.300(7)(b) and 62-701.300(12)(a)	✓			
10.25	Unauthorized storage or processing within 50 feet from any body of water, including wetlands? (Does not include parts of permitted stormwater system, or water bodies totally within facility with no discharge to surface waters.) 62-709.300(7)(b), 62-701.300(12)(b)	✓			
10.26	Is processed material removed from facility within 18 months, unless longer storage authorized by permit? 62-709.330(2)	✓			
10.27	Is the facility accepting only yard trash, and bags used to collect yard trash and containerizing any other material? 62-709.330(3)	✓			
Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ONLY THOSE FACILITIES THAT BLEND MANURE OR COMPOST VEGETATIVE WASTES, ANIMAL BYPRODUCTS OR MANURE	Ok	Not Ok	Unk	N/A
10.28	Unauthorized storage or processing within 500 feet off-site potable water well that existed before facility registered? 62-709.300(7)(b) and 62-701.300(2)(b)				✓
10.29	Unauthorized storage or processing within 200 feet from any body of water, including wetlands? (Does not include parts of permitted stormwater system, or water bodies totally within facility with no discharge to surface waters.) 62-709.300(7)(b), 62-701.300(2)(e)				✓
10.30	Unauthorized storage or processing within 10,000 feet of any licensed and operating airport runway used by turbine powered aircraft, or within 5,000 feet of any licensed and operating airport runway used only by piston engine aircraft, unless applicant demonstrates that the facility is designed and will be operated so that it does not pose a bird hazard to aircraft? 62-709.300(7)(b), 62-701.320(13)(b)				✓
10.31	Is the carbon:nitrogen ratio of the blended feedstocks greater than 20? 62-709.350(2)				✓
10.32	Do piles exceed 12 feet in height? 62-709.350(3)				✓
10.33	Is all material removed within 18 months, unless longer storage authorized by permit? 62-709.350(5)				✓
10.34	Is there documentation showing that disinfection has been achieved? Note that this is not required if they are composting only pre-consumer vegetative waste with or without yard trash. 62-709.350(6)				✓

Inspection Date: 08/23/2017

Item No.	REQUIREMENTS AND PROHIBITIONS APPLICABLE TO ONLY THOSE FACILITIES THAT BLEND MANURE OR COMPOST VEGETATIVE WASTES, ANIMAL BYPRODUCTS OR MANURE	Ok	Not Ok	Unk	N/A
10.35	<p>Is there vector attraction reduction controls that include one of the following? 62-709.350(7)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Temperature monitoring records showing the waste was composted for at least 14 days, with temperature no lower than 40 degrees Celsius and average temperature of the material being composted higher than 45 degrees Celsius. or 62-709.350(7)(a) <input type="checkbox"/> Results of testing showing the specific oxygen uptake rate (SOUR) for material being composted or blended equal to or less than 1.5 milligrams of oxygen per hour per gram of total solids (dry weight basis) at a temperature of 20 degrees Celsius. 62-709.350(7)(b) 				✓

Inspection Date: 08/23/2017

12.0 - SECTION 12.0 - WTE FACILITIES

Requirements:

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Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18))	Ok	Not Ok	Unk	N/A
12.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a)	✓			
12.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
12.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
12.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event.) 62-701.300(2)(d)	✓			
12.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
12.5	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
12.6	Are the following unauthorized wastes or special wastes properly managed? (Check any that are Not OK) <input type="checkbox"/> Lead-acid batteries, mercury-containing switches and lamps in WTEs 62-701.300(9) <input type="checkbox"/> CCA treated wood 62-701.300(14)	✓			
Item No.	WTE FACILITY OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
12.7	WTE facility in compliance with all permit conditions, site certification conditions, Department order, or certification, if any, and applicable requirements? 62-701.320(1), 403.161, F.S.	✓			

COMMENTS:

On August 23, 2017, an annual Routine Operations inspection was conducted at this facility for the Waste-to-Energy Resource Recover, C&D Materials Recovery Facility, SOPF processing and Waste Tire Collector permitted units. Each unit was actively operating during this evaluation.

SOPF Storage/Processing - This area was processing yard wastes for mulch (40% of volume of waste stream) and composting preparation (60% volume of waste stream) at the compost processing facility, Lee-Hendry Solid Waste facility. During the winter season, 100% of processed yard wastes goes to composting at Lee-Hendry. No issues or concerns were noted in this unit area during the evaluation.

Waste Tire Collection - Approximately 1,000 waste tires were on site at the time of the evaluation, No issues or concerns were noted in this unit area during this evaluation.

C&D Materials Recovery - This unit was receiving C&D wastes which was being put directly into the recovery process. No issues or concerns noted in this unit area at time of evaluation.

Waste to Energy Facility - No concerns or issues noted during inspection.

Overall status of the Lee County Resource Recovery Facility - In compliance at the time of the annual inspection for each permitted unit.

Inspection Date: 08/23/2017

Inspection Date: 08/23/2017

Signed:

Rick R Roudebush

PRINCIPAL INSPECTOR NAME

Environmental Specialist

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SDO

ORGANIZATION

09/05/2017

DATE

Renee Kwiat

INSPECTOR NAME

Environmental Consultant

INSPECTOR TITLE

NO SIGNATURE REQUIRED

INSPECTOR SIGNATURE

FDEP - SDO

ORGANIZATION

Katie O'Gara

INSPECTOR NAME

Environmental Specialist

INSPECTOR TITLE

NO SIGNATURE REQUIRED

INSPECTOR SIGNATURE

FDEP - SDO

ORGANIZATION

Laura Gray

REPRESENTATIVE NAME

Engineering Manager

REPRESENTATIVE TITLE

NO SIGNATURE REQUIRED

REPRESENTATIVE SIGNATURE

Lee County Solid Waste Division

ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Rebecca Rodriguez

REPRESENTATIVE NAME

Engineering Manager

REPRESENTATIVE TITLE

NO SIGNATURE REQUIRED

REPRESENTATIVE SIGNATURE

Lee County Solid Waste Division

ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Report Approvers:Approver: Ryan B SnyderInspection Approval Date: 09/22/2017