



Florida Department of Environmental Protection

South District
P.O. Box 2549
Fort Myers, FL 33902-2549

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 22, 2010

VIA ELECTRONIC MAIL

Lee County Solid Waste Division
c/o Laura Gray, P.E., Engineering Manager
E-Mail: lgray@leegov.com
10500 Buckingham Road
Fort Myers, Florida 33906

Re: Lee County – SW
Lee County Solid Waste Energy Recovery (WTE) Facility
Modification to Site Certification to Incorporate
Lee County Construction & Demolition Debris Recycling Facility
Request for Additional Information (RAI) No. 1
WACS ID No. 93715

Dear Ms. Gray:

The Department has reviewed the construction/operation permit application package prepared by the Lee County Solid Waste Division for the proposed Lee County Construction and Demolition Debris Recycling Facility (CDDRF). It was dated March 2010 and received by the Department on April 2, 2010. The submittal was determined to be incomplete and additional information, as requested below, is required to complete the application.

Please reference Florida Administrative Code (F.A.C.), Rule 62-701.710(2), Application, that the application "shall include the information required in subsections F.A.C. Rule 62-701.320(5), (6), and (7)".

PLANS:

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



3. Please provide a Vicinity Map meeting F.A.C. Rule 62-701.320(7)(f)4.
4. Please provide a Topographic Survey of the proposed CDDRF site [F.A.C. Rule 62-701.710(2)(g)].
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)].
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 (asphalt, concrete, unpaved, etc.). Indicate road locations and surface type, and connect or delete lines to clarify entrance details [F.A.C. Rules 62-701.320(7)(f)5 and 62-701.710(2)(b)].
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. Rules 62-701.320(7)(f)5 and 62-701.710(2)(b)].
8. On the Site Plan, please show 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].

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. Rules 62-701.200(24) and 62-701.200(121)].

2. Item 3, Operations and Functions of Processing: Please describe "unauthorized waste" [F.A.C. Rules 62-701.710(2)(a) and (4)(a)2].
3. Item 3, Operations and Functions of Processing Equipment: 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)].
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 the positioning, type, and capacity of the storage containers used for the recycled materials being extracted and identify the sorted materials [F.A.C. Rule 62-701.710(2)(c)].
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)].
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. Rules 62-701.710(2)(d), (2)(e) and (3)(c)].
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.
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 62-701.710(6)(c) and (d)].
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).

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

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

Lee County Solid Waste Energy Recovery (WTE) Facility
WACS ID No. 93715, RAI No. 1
April 22, 2010

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 addresses the items listed in (16)(a), with no reference made to text outside of the written plan.

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.
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.

Should you have any questions, please contact Don Forsberg at (239)332-6975, extension 185, or email DonaldForsberg@dep.state.fl.us. Please submit at least four (4) copies of your response. Your cooperation in this matter is appreciated.

Sincerely,



Charles Emery III
Environmental Administrator

CE/DF/MR/se

- c: Mel Reinhart, DEP Fort Myers mel.reinhart@dep.state.fl.us
Bill Krumbholz, DEP Fort Myers bill.krumbholz@dep.state.fl.us
Jack Myers, DEP Fort Myers jack.d.myers@dep.state.fl.us
Frank Nemec, DEP frank.nemec@dep.state.fl.us