



LEE COUNTY  
SOUTHWEST FLORIDA

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May 24, 2011

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2600 Blair Stone Road

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Tallahassee, Florida 32399-2400

Karen B. Hawes  
County Manager

**RE: Lee County Resource Recovery Facility  
Title V Air Operation Permit Renewal, Project No. 0710119-007-AV  
Comments Regarding Draft Renewal Permit Received April 15, 2011 (via email)**

Diana M. Parker  
County Hearing Examiner

Dear Mr. Holtom:

On March 18, 2011, the Florida Department of Environmental Protection (FDEP) issued emails to the Lee County RRF (Facility) stating that a draft of the Facility's renewal Title V permit was available for review and comment. On March 29, 2011, FDEP issued emails indicating that updated draft documents were available for review. And on April 15, 2011, FDEP issued emails indicating that another set of draft documents were available for review. The purpose of this letter is to submit Facility comments regarding the draft renewal Title V permit to the FDEP for consideration prior to the official public comment period.

**A. STATEMENT OF BASIS**

1. Page 2 of 3, CAM

The language of the CAM discussion is consistent with the current Title V permit, but not with the draft Title V permit. Further, Lee County has decided to modify the underlying PSD permit to address the CAM issue. Upon resolution of the CAM issues discussed during our April 14, 2011 and April 27, 2011, conference calls and modification of the PSD permit, this condition will need to be updated.

**B. Title V Air Operation Permit Revision – Main Body**

1. Page 3 of 34, Subsection C. Applicable Requirements, 40 CFR 64, Compliance Assurance Monitoring (CAM)

The only emission unit to which CAM is indicated to apply is EU 006. Upon resolution of the CAM issues discussed during our April 14, 2011 and April 27, 2011, conference calls and modification of the PSD permit, this condition will need to be updated.

2. Page 4 of 34, Conditions FW2 and FW3

These two permit conditions are essentially the same and potentially set up double jeopardy in the case of the occurrence of an objectionable odor. Additionally, the definition of “objectionable odor” is newly added to the permit and applies whether or not it is explicitly included in a permit term. To our knowledge, the DEP has never informed the County of a single complaint related to an “objectionable odor” in over 16 years of operation. We request that the added definition be deleted and Conditions FW2 and FW3 are combined into a single permit term.

3. Page 7 of 34, Condition A.5

The language of this permit term imposes three separate throughput limitations, two of which (daily mass throughput and hourly heat input) are impossible to demonstrate compliance with continuously. We request that the following clarification statement be added to the permit term:

“Compliance with the hourly steam production limit constitutes compliance with the other, non-measurable throughput limitations.”

4. Pages 7 and 8 of 34, Condition A.7

The language of this permit term is slightly different in a number of places from the corresponding term in the current permit. As an example, item f.(1) in the draft permit is very different from the corresponding term in the current permit, although the end result of the term is not changed. The basis for the permit term is referenced as PSD-FL-151B, but there is no discussion in the Statement of Basis that the previous (i.e., PSD permit-based) language was obsolete and, therefore, changed. While we agree with the minor changes in format and language, we want to be sure that the changes can be made since the underlying basis is PSD permit language.

5. Page 9 of 34, Condition A.8, last sentence

Effective June 3, 2007, the requirements of 40 CFR Part 60, Subpart Db are not applicable to any affected facility that is subject to the requirements of 40 CFR Part 60, Subpart Cb (see 40 CFR § 60.40b(k)). Therefore, the annual capacity factor portion of Condition A.8 is no longer applicable and, along with the associated regulatory citations, should be deleted. As a note, this provision was deleted from the current permit (see Condition A.10.2) in a previous permitting action.

6. Page 10 of 34, Condition A.18  
The underlying PSD-FL-151 permit includes SO<sub>2</sub> limits in terms of lbs/MMBtu heat input, lbs/hour per unit, and tons/year per unit. However, there is no discussion in the Statement of Basis that these previous (i.e., PSD permit-based) terms are obsolete and, therefore, removed. While we agree that they should be removed, we want to be sure that the changes can be made since the underlying basis is PSD permit language.
7. Page 10 of 34, Condition A.19  
The underlying PSD-FL-151 permit includes HCl limits in terms of lbs/MMBtu heat input, lbs/hour per unit, and tons/year per unit. However, there is no discussion in the Statement of Basis that these previous (i.e., PSD permit-based) terms are obsolete and, therefore, removed. While we agree that they should be removed, we want to be sure that the changes can be made since the underlying basis is PSD permit language.
8. Page 11 of 34, Condition A.28  
This permit term, pertaining to fugitive ash emissions, has historically not been included with the permit terms for the individual MWC units, but instead has been included with the permit terms for E.U. ID No. 004. In fact, the term is included as Condition C.7 of the draft permit. To avoid potential double jeopardy and to simplify the permit, we request that Condition A.28 be deleted and Condition C.7 be kept as is.
9. Page 11 of 34, Condition A.29  
This permit term does not include the provisions of 40 CFR 60.58b(a)(1)(iii) that allows for 15 hours of excess CO emissions during loss of boiler water level control. It also does not contain similar provisions that allow the diluent to be capped at 14% O<sub>2</sub> for SO<sub>2</sub> and NO<sub>x</sub> emissions. We request that both the safety-related CO allowance and the O<sub>2</sub> correction allowance be incorporated into the language of this permit term.
10. Page 11 of 34, Condition A.31  
Review of the facility PSD permit indicates that the language of this permit term is the same as Specific Condition 3.f. (iii) of PSD-FL-151B. As such, a reference to the underlying PSD permit should be added to the list of underlying requirements.
11. Page 12 of 34, Continuous Monitoring Requirements  
Condition A.70 in the current permit requires that all baghouses at the facility, excepting specifically listed units, be equipped with pressure drop monitoring equipment. The basis for the requirement is listed as PSD-FL-151A. However, the draft permit does not appear to include this requirement for Units 1 and 2. Unless this permit condition has been determined as obsolete and therefore removed, the condition should be added to this section of the draft permit.

12. Page 12 of 34, Conditions A.32 and A.33

These two permit terms are applicable solely because of the applicability of 40 CFR Part 60, Subpart Cb (referencing Subpart Eb) to the emission units. All of the other permit terms that are directly from these regulations have been removed from the permit body and, instead, are included in an Appendix to the permit. For consistency, we request that these two permit terms also be deleted.

13. Page 12 of 34, Condition A.36

Upon resolution of the CAM issues discussed during our April 14, 2011 and April 27, 2011, conference calls and modification of the PSD permit, this condition will need to be updated.

14. Page 12 of 34, Condition A.37, PM/PM10

- a. The reference to Method 202 is new. None of the emission limits in the draft permit require the use of Method 202. We request that this reference be deleted from the permit.
- b. The description indicates that the minimum sample volume shall be 30 dry-standard cubic feet. However, 40 CFR §60.58b(c)(3) requires a minimum sample volume of 1.7 cubic meters (approximately 60 cubic feet – see page 16 of 39, APPENDIX 40 CFR 60 SUBPART Eb attached to the draft permit). We request that the reference to the minimum sample volume either be completely deleted or corrected.

15. Page 13 of 34, Condition A.37, Fluorides

The statement "One sample shall constitute one test run" is language that is not contained in the current permit and the purpose for its inclusion in the draft permit is unknown. Review reveals that the phrase is not contained in PSD-FL-151. Further, Lee County has decided to modify the underlying PSD permit that is the source of this condition. We anticipate that this condition will be updated to reflect the modified PSD permit.

16. Page 13 of 34, Condition A.40

Lee County has decided to modify the underlying PSD permit that is the source of this condition. We anticipate that this condition will be updated to reflect the modified PSD permit.

17. Page 14 of 34, Condition A.44

The permit language includes the phrase "one-hour" three times. This phrase is not in the underlying PSD permit. In addition, the previously discussed requirement to collect a minimum sample size of 1.7 cubic meters dictates that PM sampling cannot be completed in a one-hour time frame. We request that each occurrence of the phrase "one-hour" be deleted.

18. Page 14 of 34, Condition A.45

- a. *First row, "Reporting Deadline(s)"* – As listed in the "Report" column, the Excess Emissions from Malfunctions report is required only if requested by the Compliance Authority. For clarity, we request that the "Reporting Deadline(s)" language be revised to state the following:

"Every 3 months (quarter), if requested by the Compliance Authority"

Alternatively, since this requirement is also contained in APPENDIX RR (Condition RR1), the entry could be deleted, along with Condition A.46.

- b. *Third row, "Reporting Deadline(s)"* – 40 CFR 60.7(c) requires that the reports be postmarked by the 30<sup>th</sup> day following the end of each six-month period (see page A-8 of 32, APPENDIX 40 CFR 60 SUBPART A of the draft permit). We request that this language be included in this permit condition. Further, although Rule 62-210.700(6), F.A.C. and PSD-FL-151 are both silent on the date, we request the inclusion of language allowing for a 30 day processing and submittal time period for the non-NSPS requirements.

19. Page 14 of 34, Condition A.46

This permit term is redundant with Condition RR3 in APPENDIX RR and should be deleted.

20. Pages 14 and 15 of 34, Condition A.49

The language of this permit term appropriately removes the references to a 3% limitation, which are obsolete because of testing that the facility has performed and that was witnessed by a DEP representative and the test results submitted to the DEP. The basis for the permit term is referenced as PSD-FL-151B, but there is no discussion in the Statement of Basis that the previous (i.e., PSD permit-based) language referencing the 3% value was obsolete and, therefore, changed. While we agree with removal of the reference to 3%, we want to be sure that the changes can be made since the underlying basis is PSD permit language.

21. Page 15 of 34, Condition A.50

This permit term is new and serves no environmental protection purposes. Keeping monthly auxiliary burner fuel usage records, and calculating an equivalent heat input, does not help to ensure compliance with any condition listed in the permit. We request that this permit term be deleted.

22. Page 15 of 34, Condition A.52

The permit term does not include the regulatory requirement that the records must be retained for at least five years following the date on which the information was recorded. The applicable five year requirement should be included.

23. Page 16 of 34, Condition A.58

To avoid potential confusion, we request that the phrase "see permitting note above" be inserted in the language of the permit term.

24. Page 18 of 34, Condition B.5

The language of this permit term imposes three separate throughput limitations, two of which (daily mass throughput and hourly heat input) are impossible to demonstrate compliance with continuously. We request that the following clarification statement be added to the permit term:

“Compliance with the hourly steam production limit constitutes compliance with the other, non-measurable throughput limitations.”

25. Pages 18, 19, and 20 of 34, Condition B.7

- a. The language of this permit term is slightly different in a number of places from the corresponding term in the current permit. As an example, item f.(1) in the draft permit is very different from the corresponding term in the current permit, although the end result of the term is not changed. Although not included in the regulatory citation section, the basis for the permit term is PSD-FL-151D. There is no discussion in the Statement of Basis that the previous (i.e., PSD permit-based) language was obsolete and, therefore, changed. While we agree with the minor changes in format and language, we want to be sure that the changes can be made since the underlying basis is PSD permit language.
- b. Item e, *Waste Tires* – The reference to 3% should be updated to 5%.

26. Page 20 of 34, Condition B.8, last sentence

Effective June 3, 2007, the requirements of 40 CFR Part 60, Subpart Db are not applicable to any affected facility that is subject to the requirements of 40 CFR Part 60, Subpart Cb (see 40 CFR § 60.40b(k)). Therefore, the annual capacity factor portion of Condition A.8 is no longer applicable and, along with the associated regulatory citations, should be deleted. As a note, this provision was deleted from the current permit (see Condition A.10.2) in a previous permitting action.

27. Page 20 of 34, Condition B.10, Item D

The language of this permit term does not include language included in the corresponding term in the current permit (e.g., the provisions for the first 12 months of operation). The basis for the permit term is referenced as PSD-FL-151D, but there is no discussion in the Statement of Basis that the previous (i.e., PSD permit-based) language was obsolete and, therefore, changed. While we agree with deletion of the language, we want to be sure that the changes can be made since the underlying basis is PSD permit language.

28. Page 22 of 34, Condition B.23

The 15 ppm alternative included in the current permit was not included in the draft permit language. We request that it be added to the draft condition, along with a reference to Condition B.43 of the draft permit. Alternatively, Condition B.43 of the draft permit should be moved to directly follow Condition B.23 to avoid potential confusion.

29. Page 22 of 34, Condition B.24

This permit term, pertaining to fugitive ash emissions, has historically not been included with the permit terms for the individual MWC units, but instead has been included with the permit terms for E.U. ID No. 004. And, in fact, the term is included as Condition C.7 of the draft permit. To avoid potential double jeopardy and to simplify the permit, we request that Condition B.24 be deleted and Condition C.7 be kept as is.

30. Pages 22 and 23 of 34, Condition B.25

The language of this permit term is significantly different than the corresponding term in the current permit. The basis for the permit term is referenced as PSD-FL-151D, but there is no discussion in the Statement of Basis that the previous (i.e., PSD permit-based) language was obsolete and, therefore, changed. We want to be sure that the changes accurately reflect the underlying PSD permit language and that they can be made since the underlying basis is PSD permit language.

31. Pages 22 and 23 of 34, Condition B.25

This permit term does not include the provisions of 40 CFR 60.58b(a)(1)(iii) that allows for 15 hours of excess CO emissions during loss of boiler water level control. It also does not contain similar provisions that allow the diluent to be capped at 14% O<sub>2</sub> for SO<sub>2</sub> and NO<sub>x</sub> emissions. We request that both the safety-related CO allowance and the O<sub>2</sub> correction allowance be incorporated into the language of this permit term.

32. Page 23 of 34, Condition B.26

The language of this permit term is significantly different than in the corresponding term in the current permit. The basis for the permit term is referenced as PSD-FL-151D, but there is no discussion in the Statement of Basis that the previous (i.e., PSD permit-based) language was obsolete and, therefore, changed. We want to be sure that the changes can be made since the underlying basis is PSD permit language.

33. Page 23 of 34, Conditions B.28 through B.31

These four permit terms are applicable because of the applicability of 40 CFR Part 60, Subpart Eb to the emission unit. However, they are all also part of the underlying PSD-FL-151D permit (see Conditions B.13, B.14, and B.16 of PSD-FL-151D). All of the other permit terms that are directly from Subpart Eb have been removed from the permit body and, instead, are included in an Appendix to the permit. For consistency, we request that these four permit terms also be deleted. However, we want to be sure that this change can be made since the underlying basis is PSD permit language.

34. Pages 23 and 24 of 34, Condition B.33

The language and location of this permit term implies that this requirement applies only to Unit 3 (i.e., there is no similar language applicable to Units 1 and 2 in Section A). The truck scales and pit inventory do not, and can not, segregate data applicable to Unit 3 only. To avoid confusion, we request that this permit term be moved to Section II, Facility-Wide Conditions as new permit condition FW12.

35. Page 24 of 34, Condition B.34

Upon resolution of the CAM issues discussed during our April 14, 2011 and April 27, 2011, conference calls and modification of the PSD permit, this condition will need to be updated.

36. Page 24 of 34, Condition B.35

- a. PM/PM10: The reference to Method 202 is new. None of the emission limits in the draft permit require the use of Method 202. We request that this reference be deleted from the permit.
- b. HF: The statement "One sample shall constitute one test run" is language that is not contained in the current permit and the purpose for its inclusion in the draft permit is unknown. Review reveals that the phrase is not contained in PSD-FL-151D. We request that this phrase be deleted from the draft permit. Further, Lee County has decided to modify the underlying PSD permit that is the source of this condition. We anticipate that this condition will be updated to reflect the modified PSD permit.

37. Page 25 of 34, Condition B.38

Lee County has decided to modify the underlying PSD permit that is the source of this condition. We anticipate that this condition will be updated to reflect the modified PSD permit.

38. Page 25 of 34, Condition B.39

Review of the Unit 3 PSD permit indicates that the language of this permit term is the same as Specific Condition B.11 of PSD-FL-151D. As such, a reference to the underlying PSD permit should be added to the list of underlying requirements.

39. Pages 25 and 26 of 34, Condition B.45

- a. *First row, "Reporting Deadline(s)"* – As listed in the "Report" column, the Excess Emissions from Malfunctions report is required only if requested by the Compliance Authority. For clarity, we request that the "Reporting Deadline(s)" language be revised to state the following:

"Every 3 months (quarter), if requested by the Compliance Authority"

Alternatively, since this requirement is also contained in APPENDIX RR (Condition RR1), the entry could be deleted, along with Condition B.46.

- b. *Second row, "Reporting Deadline(s)"* – 40 CFR 60.7(c) requires that the reports be postmarked by the 30<sup>th</sup> day following the end of each six-month period (see page A-8 of 32, APPENDIX 40 CFR 60 SUBPART A of the draft permit). We request that this NSPS language be included in this permit condition. Further, although Rule 62-210.700(6), F.A.C. and PSD-FL-151D are both silent on the date, we request the inclusion of language allowing for a 30 day processing and submittal time period for the non-NSPS requirements.



40. Page 26 of 34, Condition B.46  
This permit term is redundant with Condition RR3 in APPENDIX RR and should be deleted.
41. Page 26 of 34, Condition B.48  
The language of this permit term appropriately removes the references to a 3% limitation, which are obsolete because of testing that the facility has performed. In addition, the language has been revised from that contained in PSD-FL-151D. However, there is no discussion in the Statement of Basis that the previous (i.e., PSD permit-based) language referencing the 3% value was obsolete and, therefore, changed. While we agree with removal of the reference to 3% and the other changes to permit language, we want to be sure that the changes can be made since the underlying basis is PSD permit language.
42. Page 26 of 34, Condition B.49  
This permit term is new and serves no environmental protection purposes. Keeping monthly auxiliary burner fuel usage records, and calculating an equivalent heat input, does not help to ensure compliance with any condition listed in the permit. We request that this permit term be deleted.
43. Pages 26 and 27 of 34, Condition B.50  
The permit term does not include the regulatory requirement that the records must be retained for at least five years following the date on which the information was recorded. The applicable five year requirement should be included.
44. Page 28 of 34, Condition C.2  
The permitted capacities listed for the lime silo and ash handling system are both new (i.e., they are not included in any previously issued PSD or Title V permit) and have no underlying basis. The rules listed in the regulatory citations contain no basis on which to impose these permit limits. Therefore, we request that Condition C.2 be deleted in its entirety.
45. Page 29 of 34, Condition C.5  
The informational reference to an equivalent 2.12 lbs/hr and 9.28 TPY is new and could be mistakenly construed as constituting permit limits. As such, we request that this information be deleted.
46. Page 29 of 34, Condition C.7  
This permit term is applicable because of the applicability of 40 CFR Part 60, Subpart Eb to the ash handling system. All of the other permit terms that are directly from Subpart Eb have been removed from the permit body and, instead, are included in an Appendix to the permit. For consistency, we request that this permit term also be deleted.
47. Page 30 of 34, Condition C.17, C18, and C19  
These permit terms are redundant with Conditions RR1 and RR3 in APPENDIX RR and should be deleted.

48. Pages 30 and 31 of 34, Conditions C.20 through C.23

These Emission Guidelines and NSPS based permit terms apply only to the ash handling system and do not apply to the lime silo. A note should be added to each permit term indicating this (for an example, see Condition C.7 of the draft permit). Alternatively, the lime silo should be moved to a separate section to avoid confusion.

**C. APPENDIX CAM – CAM Plan**

1. As discussed in an April 27, 2011 telephone conference call between myself, Mr. M. Kirk Dunbar of HDR Engineering, and Mr. Jonathon Holtom of FDEP, Mr. Holtom indicated that FDEP agreed with our original assertion that CAM is satisfied for the PM BACT limits contained in the draft permit. As such, no CAM plan is required for PM for any of the three units. The language in APPENDIX CAM should be revised to reflect this FDEP determination.
2. Lee County has decided to modify the underlying PSD permit to address the CAM issue. Upon resolution of the CAM issues discussed during our April 14, 2011 and April 27, 2011, conference calls and modification of the PSD permit, this section will need to be updated.

**D. Table 1, Summary of Air Pollutant Standards and Terms**

1. EU 001 and 002, Cd  
The 0.009 lbs/hour and 0.041 tons per year values are not allowable limits and, as such, should be moved to the Equivalent Emissions columns.
2. EU 001 and 002, Hg, First Row  
The 0.0271 lbs/hour and 0.118 tons per year values are not allowable limits and, as such, should be moved to the Equivalent Emissions columns.
3. EU 001 and 002, Pb
  - a. First Row - The 0.108 lbs/hour and 0.473 tons per year are not allowable limits and, as such, should be moved to the Equivalent Emissions columns.
  - b. Second Row – The value in the Standard(s) column should be corrected to 0.00060 lb/MMBtu.
4. EU 001 and 002, SO<sub>2</sub>  
As discussed previously, PSD-FL-151 contains SO<sub>2</sub> limits in terms of lbs/MMBtu heat input, lbs/hour per unit, and tons/year per unit. If these limits should be included in the renewal Title V permit application, a row should be added for the 0.150 lbs/MMBtu limit and the 41.0 lbs/hour and 163.3 tons per year values are allowable limits and, as such, should be moved to the Allowable Emissions columns of the new row.

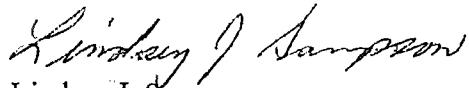
5. EU 001 and 002, HCl  
As discussed previously, PSD-FL-151 contains HCl limits in terms of lbs/MMBtu heat input, lbs/hour per unit, and tons/year per unit. If these limits should be included in the renewal Title V permit application, a row should be added for the 0.064 lbs/MMBtu limit and the 17.7 lbs/hour and 70.70 tons per year (versus 77.5 as shown in the draft Table 1) values are allowable limits and, as such, should be moved to the Allowable Emissions columns of the new row.
6. EU 001 and 002, Dioxin/Furan, First Row  
The  $7.0 \times 10^{-6}$  lbs/hour and  $2.8 \times 10^{-5}$  tons per year values correspond to the  $2.54 \times 10^{-8}$  lbs/MMBtu limit and, as such, should be moved to the Allowable Emissions columns of the second row.
7. EU 001 and 002, NO<sub>x</sub>, First Row  
The 80.0 lbs/hour and 320.0 tons per year values correspond to the 0.290 lbs/MMBtu limit and, as such, should be deleted from the Equivalent Emissions columns of the first row.
8. EU 001 and 002, CO, First Row  
The 27.2 lbs/hour and 320.0 tons per year values correspond to the 0.10 lbs/MMBtu limit and, as such, should be deleted from the Equivalent Emissions columns of the first row.
9. EU 001 and 002, VOC, First Row  
The 5.80 lbs/hour and 23.0 tons per year values correspond to the 0.021 lbs/MMBtu limit and, as such, should be moved to the Equivalent Emissions columns of the second row.
10. EU 001 and 002, F  
Lee County has decided to modify the underlying PSD permit to address fluoride emissions. Upon modification of the PSD permit, this section will need to be updated.
11. EU 003, HF  
Lee County has decided to modify the underlying PSD permit to address fluoride emissions. Upon modification of the PSD permit, this section will need to be updated.

***E. Table e, Summary of Compliance Requirements***

1. EU 001 and 002, F  
Lee County has decided to modify the underlying PSD permit to address fluoride emissions. Upon modification of the PSD permit, this section will need to be updated.
2. EU 003, HF  
Lee County has decided to modify the underlying PSD permit to address fluoride emissions. Upon modification of the PSD permit, this section will need to be updated.

Thank you for your consideration of our comments. Should you have any questions, please contact me at (239-533-8000) or Mr. M. Kirk Dunbar of HDR Engineering, Inc. at (763-591-5476).

Sincerely,



Lindsey J. Sampson  
Lee County Solid Waste Division Director

cc: D. Castro – HDR Engineering, Inc.  
K. Dunbar – HDR Engineering, Inc.  
T. Vielhauer – Bureau Chief, DEP Bureau of Air Regulation  
S. Sheplak – DEP Bureau of Air Regulation  
M. Halpin, P.E. – DEP-Siting  
A. Satyal – DEP-SD  
Mike Duff – Covanta Energy of Lee County  
J. Gorrie – Covanta Energy

## Sheplak, Scott

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**From:** Sampson, Lindsey [LSampson@leegov.com]  
**Sent:** Tuesday, May 24, 2011 6:33 PM  
**To:** Holtom, Jonathan; Sheplak, Scott  
**Cc:** Gorrie, Jason; Duff, Michael; Dunbar, Kirk; Castro, Don  
**Subject:** "Revised" Lee Response to DEP Draft Title V Permit  
**Attachments:** Lee Response to DEP Draft Title V Pmt V2.pdf

Dear Jonathan,

Please disregard my previous email. I corrected "15 minutes" to "15 hours" in items 9 and 31.

The corrected response is attached.

Lindsey J. Sampson  
Lee County Solid Waste Division  
[sampsolj@leegov.com](mailto:sampsolj@leegov.com)  
Ph 239-533-8000  
Fax 239-461-5871

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