

Miramar - Lee County CnD Ord. comments for SWA.

Broward County and its vendor must amend the current Broward County Disposal Service Agreement, to include other vendors. Otherwise, this won't work.

Lose control of our own destiny without ownership of facilities. Opposite reason many members joined the SWA.

Consultant has stated that the "private sector" has sufficient capacity to handle waste stream, so why do we need Transfer Stations.

SWA is proposing to create flow control to private businesses. But SWA will not own its own facilities, lose control of our destiny by being attached to private sector businesses, and higher rates.

Municipalities already utilize the current facilities for processing of CnD materials prior to final disposal.

This Ordinance and policies would require additional members staffing and expenses to administer and manage. Increase cost will be passed onto the customer.

There has been no discussion with Industry about this for their feedback.

Requiring recycling for members who do not recycle because of the high cost of recycling processing. Forcing them to increase the collection and disposal cost for residents.

Lee county incorporated CnD and Recycling Ord. to extend life of their own facilities. SWA / Broward County owns very few facilities. Not apples to apples comparison.

A lot of the Lee County Ordinance speaks to "discretion" of the Director. If all members pass their own CnD Ordinance, this fragments the SWA, as well as each member most likely have different Ordinance rules to follow. Creating more confusion instead of universal process throughout the County.

CnD operations create revenue streams for some members. Has the consultant investigated how this would impact those members. Since creating a source separate/ recycling system would undermine the members authority over waste streams.

Developers would lose precious operating space on projects due to increase in collection containers.

Haulers would need more staff (already hard to find qualified personal), increase in containers purchases, and vehicles.

Increase in vehicle traffic on road and GHGs.

Lee Co. Ord provide for self-hauling. Not sure if any members allow that.

Will the rate be the same across the board?

Does Ordinance require Developer to still use franchise hauler for CnD work or can they choose the hauler and negotiate price?

Attorneys need to confirm Definition and applicability of State Statutes on Cnd and Recycling.

How can this be adopted without any certified facilities?

What if developers refuse to comply or choose not to recycle? Will they not be issued a permit, is there a fine?

Who monitors the onsite recycling rules, educations, collection agreement for MF properties?

What if member city requires permit for some of the work performed (elec, plumbing) that Lee County does not require a permit for or is considered exempt?

Recommend bring the SWA Members BPZ and Code Compliance Directors in for their opinion, and thoughts on how proposed ordinance may impact their operations.

Need a clean policy for CnD deposits, reimbursements, challenges and protests.

Need to define the acceptable recycling materials. Suggest limiting to those commodities that are revenue producers. This will decrease contamination and processing fees.

Recycling facility (MRF) MUST have a bag breaker. This will increase the amount of processible recyclables and decrease the contamination rate.

Salvage – provides for the storing of materials for use later. Not good idea.

The Lee Co. Ordinance uses the State Statutes for definitions, but CnD is defines as solid waste.

If set-up source separations of CnD materials at site of development, member loose authority to direct those “recyclables”.

Has consultant reviewed the impact this CnD, MF and Commercial recycling Ord would have on members recurring revenues?

Mandatory recycling will require ALL BUSINESS to add another element to their staffs workload, take up space and enter into a collection agreement.

Processing of recyclables cost about 3x solid waste disposal costs.

Requiring all businesses/MFs' to "recycle" requires containers. Obtaining that amount of containers would be quite challenging. It can take years.

Outdoor storage of collection containers must meet County standards. What if the member city has Stricker regulations, whose trumps the other regulation?

Employee recycling education. Who confirms each business is following the rules, SWA staff, Member staff, independent contractor?

The Lee County Director has a lot of power in this Ordinance, not sure that's going to work.

Business only have 20 days to respond to violation. Way to short, 45-60 days.

If violation occurs, whose magistrate hears the case? County or municipality?

MF recycling requires collection of recyclable, PLUS white goods and electronic devices. White goods and electronic devices can contain hazardous waste. How will that be regulated for proper handling and disposal.

Who will customers submit recycling "exceptions" to, County or member city?

Lee county ord permits, anonymous complaints which can trigger investigation. This element would have to comply with Code violation practices.

Curious as to how many commercial and multi-family businesses are I Lee County compared to Broward County.

Many MF properties are run/governed by Property Managers (PMs) and/or HOAs. Many of which can be off-site. What happens when paperwork (invoices, receipts) is not available for inspection. Or not available at all because the previous PMs or HOA representative are no longer associated with the property.

Who carries out Code Compliance efforts, the County, SWA or member City. Some members Code Department are Sheriff Dept. are they going to want to be involved in this. Has the BC Sheriff Dept. been asked for their opinion?

Diversion of Waste provides the Director a lot of leeway with the permitted "methods" for processing and or disposal methods. Potential litigation in the future if materials are determined to be hazardous. (think old lead paint resulting from deconstruction).

Diversion Fees are only going to be passed on the customer, resulting in increased costs. When was the last time these diversion fees were updated?

How can the permit applicant make a reasonable effort to ensure the facility are measuring and recorded? It is not their business. Especially if the County or SWA certifies a facility.

Need a detailed process for reimbursement and exemption challenges.

Who oversees a difference of opinion between the County, SWA, and member city?

Please provide Lee County updated fee and Penalty schedule.

Who would determine changes to the fee and penalty schedule? The County, SWA or member. Would all members need to have the same fee schedule?

What happens if a rolloff is refused by the recycling facility as to contaminated.

What happens if the developer refutes the claim.

Members can mandate recycling but not who collects or where the materials are delivered for processing.