



# LAKE COUNTY

DEPARTMENT OF  
GROWTH MANAGEMENT

*Planning & Community Design Division*

August 27, 2010

JAMES MOTT  
CEMEX CONSTRUCTION MATERIALS FLORIDA, LLC  
100 LEM CARNES ROAD  
DAVENPORT, FL 33837

RE: **Additional Comments and Clarification**  
CEMEX - 474 SAND MINE EXPANSION – Operating Permit Application  
(Project #2010060023/ Application Request #1670)

Dear Mott:

This letter is sent to inform you of additional comments and revised comments previously provided on August 18, 2010. These latest comments are provided in similar format as those previously provided. Please respond to these latest comments with those provided on August 18, 2010.

Please address all the comments at your earliest convenience, resubmit them for review and provide a comprehensive written response to all comments. If necessary, provide four (4) signed and sealed sets of plans or revised pages for insertion into the current plans. Ensure that the revision dates are noted in the title block and indicate plan revisions as revision clouds on the revised plans.

The Development Review Staff will review the additional information within seven (7) working days of receipt for compliance with the Comprehensive Plan and LDR. Upon completing that review, you will be contacted of whether your application has been approved or requested to provide additional information.

Should you have any questions on this letter, please do not hesitate to contact our office.

Sincerely,

Steve K. Greene, AICP  
Chief Planner

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JENNIFER HILL  
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*District 2*

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*District 4*

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*District 5*

**PLANNING & COMMUNITY DESIGN DIVISION, Steve Greene, AICP, 352-343-9739**  
**Additional Comments**

**Item:** CONSISTENT WITH PROVISIONS OF THE COMPREHENSIVE PLAN AND THE LAND DEVELOPMENT REGULATIONS

1. Please revise the operating permit to be consistent with Ordinance 2010-4; specifically Sections 2.B., F. and G. These sections involve operations and permit requirements, phasing details, and water quality protection practices. A copy of Ordinance 2010-4 should be included in the permit binder and is provided for your reference.

**The previous comments from WATER QUALITY SERVICES are revised as follows:**  
**Comments**

1. Provisions should be added the operating permit consistent with the conditions specified by Ordinance 2010-4.

**Informational Comments**

1. Inspection of stations and replacement of missing and/or damaged monitoring gauges/wells
2. Re-survey to maintain datum accuracy and standardization of reporting consistent with the County system
3. Evaluation/Investigation of inconsistent data with bi-annual Professional Geologist or Professional Engineer review

These items may addressed in the manner described below:

**Task 1: Inspection and Replacement of Missing and/or Damaged Monitoring Stations**

Monthly water levels in mine pits and monitoring wells along with rainfall is required to be monitored at each mine site. Because the mines are very dynamic environments, staff gauges emerge from water and are displaced due to the movement of heavy equipment, caving, flooding, etc. Wells are occasionally damaged by heavy equipment and, in some cases, go dry.

Data collection performed on a monthly basis. The monthly monitoring and reporting should include a completed form of the type shown as an example in **Appendix A**. This is a form that briefly summarizes the conditions of monitoring wells and staff gauges in the network, together with any recommendations for replacement or repair at individual stations. This form will use the appropriate "flag" codes used by the County at their landfill and other monitoring sites.

The forms summarizing the condition of the monitoring stations will be submitted within 30 days of data collection for review. If it is determined that the integrity of the monitoring station has been compromised, repair or replace the staff gauge or monitoring well and resurvey the datum.

If the repairs involve complete replacement of a well, the services of a Florida licensed, professional geologist will be retained who will review available information on site geology and well construction and prepare technical specifications for a replacement well. Well and staff gauge replacement will be subject to approval by the St. Johns River Water Management District (SJRWMD) and/or the Florida Department of Environmental Protection (FDEP) under the terms of permits for the mine sites. Monitoring station repair and resurvey work will be completed within 90 days of receipt of required approval from the SJRWMD and/or FDEP.

The total depth of each well will be measured and recorded once per year.

Information on all wells shall be initially reported in the County's Excel station format. Wells that are not surveyed in for location can have their locations determined by GPS. New or replacement wells shall also be reported in this format with the next report.

## **Task 2: Re-survey to Maintain Datum Accuracy and Standardization of Reporting**

Any wells or staff gauges damaged will be resurveyed by a Professional Land Surveyor licensed in the State of Florida. Staff gauges that need to be relocated due to damage or operational requirements will be left in place until the new gauge is installed and surveyed. The water levels will then be compared to ensure that they are set to the same datum prior to removing the old gauge. In addition to the letter report that summarizes the station repair, replacement and re-survey that is to be submitted to the County, the Excel spreadsheet used to record and report the data will be corrected and annotated to show the date and change in datum. The cell(s) within the spreadsheet at the point of the datum change will be highlighted in color or bold font to flag the datum change and a footnote will be inserted within the print area of the specific spreadsheet page.

Where lacking; permanent benchmarks shall be established within the mine site at key locations to allow for easier re-surveying of wells and staff gauges. This can be performed in concert with other survey work at the site.

A report will be submitted to the County on a semiannual basis that contains the results of the prior 6 months of sampling and a letter explaining any problems or changes. . These reports will include the results of monitoring at all sand plants within Lake County that are subject to monitoring (Astatula Sand, Turnpike Sand, and Lake Sand). This report will be submitted within 60 days of the end of June and December respectively. The data shall be reported in an

Excel spreadsheet in the standard format specified by the County submitted electronically and hardcopy format.

**Task 3: Evaluation/Investigation of Inconsistent Data**

The well data from each mine will be transferred from field forms to an Excel spreadsheet or Access database. All data will be reviewed to determine the acceptable range of monthly fluctuation at each monitoring station. The spreadsheet or database will include a formula for each monitoring station that will automatically flag a station where the water level change over the prior month exceeds the acceptable range that is determined for that particular well or staff gauge.

If the water table falls below the bottom of a well screen, the casing may still contain water. Measurement of this water will not reflect the actual ground water level and could be ½ to 1-foot or more above the bottom of the casing. To check for this, the total depth of each well will be measured and recorded once per year. Every water level measured shall be compared to the well depth to ensure the ground water level is actually being measured. If it is determined that the water table is below the well screen, that well may have to be replaced with a deeper well.

If a monitoring station is flagged, the mine manager will determine whether this is a natural exceedance or if the station has been compromised. This will provide a measure of redundancy and serve as a cross-check to the procedures outlined under Task 1 above.

In addition, the data will be reviewed semi-annually by a Professional Geologist or Professional Engineer registered in the State of Florida to determine that the data collection stations are functioning as intended. The first semi-annual letter report that summarizes the results of this review will be prepared and submitted to the County as part of the Annual Progress Report.

**Review Status:** NEED MORE INFO