

3 – Proposed Solution

CEC's *general* approach to regulatory monitoring and reporting projects is consistent and has been shown over time to reduce regulatory burden, violations, and misunderstandings. First, dependent upon our clients' needs, we attempt to schedule required monitoring as early as possible in the allowable sampling window (e.g. early in the semiannual period) to ensure adequate time is available if issues arise that require postponement of the event. We always have trained backup personnel available. Second, unless there is a specific need discussed with, requested, or approved by our client, we keep our deliverables simple and limited to the information required by the applicable rule, permit, plan, or guidance. If a prior party had submitted reports successfully that meet all requirements, we attempt to continue that basic format for continuity. Third, we communicate, whether it be with the client or Agency, proactively. However, we do not communicate with regulatory agency personnel unless approved or requested by our client. All of our team is trained on how to manage regulator interactions. Lastly, we understand that data integrity and accuracy is paramount. We have a strict internal review policy that ensures accurate submittals.



Our *specific* approach to the Lake County Central Solid Waste Management Facility and the closed Umatilla Landfill projects, based on the information available and summarized for brevity, would follow those general tenets, as well as the following:

Scheduling

Near the beginning of semi-annual monitoring period, CEC (Ken Guilbeault) will provide the County with a proposed schedule for the required monitoring for review. If updates or adjustments to the schedule are required due to other factors, CEC will notify the County. CEC (Ken Guilbeault) will notify the FDEP of the monitoring event at least two weeks prior to the event, as required by Chapter 62-701.510.



Following the monitoring event, the CEC team will review the field logs and speak to the field technicians about the monitoring event. The CEC team will notify the County of any required maintenance issues with monitoring wells.

Laboratory Analysis

Water quality samples will be analyzed by the Lake County Water Resource Management Laboratory and the County's contracted laboratory (currently Pace Analytical Services, LLC). CEC understands that the lab will provide both electronic data deliverables and PDF reports. The samples will be analyzed using industry standards, approved EPA methods, with detection and reporting limits sufficient for comparison to applicable water quality standards.

Water Quality Notifications and Reporting

CEC will compile all field and lab information, review the information for completeness, conduct the necessary statistical analysis and data review in accordance with Chapter 62-701.510 FAC, the water quality monitoring plan, and site permit and notify Lake County of exceedances of relevant standards so that FDEP notifications can be made within 14 days as required by rule. If re-sampling of monitoring

wells is needed to verify concentrations the CEC (Mr. Guilbeault) will coordinate with the County to conduct a field event to collect samples. CEC (Mr. Guilbeault) will make the notifications to FDEP via email if requested by Lake County. CEC will compile water level elevations and create potentiometric maps for each zone in accordance with Chapter 62-701.510, FAC. Mr. Christiansen will provide QA/QC by reviewing all draft reports, maps, and calculations.

CEC will provide a draft Monitoring Report for each water quality sampling event to Lake County for review and comments within 35 days of receipt of the laboratory data. Reports will be produced for the County which will include a background and summary, description of the monitoring network, sampling, a summary of water elevations, a summary of QA/QC results, a summary of data including statistical analysis (if needed or required) and comparison to established standards, and a certification statement. Figures will include site locations, site plans, and potentiometric maps. Tables will include water levels, field results, and lab data. Once comments are addressed (a copy of the final report will be prepared for the County final review within five calendar days prior to being submitted to FDEP), CEC will prepare the final reports for signature/seal by a Florida Professional Geologist (Mr. Guilbeault) or Engineer (Mr. Nunes) and submit the final reports to FDEP within 60 days of the finalization of the laboratory reports.

CEC will provide a draft copy of the biennial technical report 35 calendar days prior to the FDEP report due date (currently October 15, 2023) for the Lake County Central Solid Waste Management Facility and October 31, 2026 for the Umatilla Closed Landfill.

Quality Control

We will implement our Quality Assurance Quality Control (QA/QC) procedures at the onset of the project with an internal kickoff meeting. The project scope, approved project schedule, including all internal milestones, will be discussed. We will also assign duties so each team member knows the responsibilities of each team member.

We understand that obtaining quality data and producing quality deliverables is a team effort and is of critical importance. We carefully selected our team to be able to produce a high quality work product for Lake County.

Our QA/QC procedures for all projects requires all calculations to be checked by a second person for accuracy and approach. All deliverables must be reviewed by at least two professionals with experience performing similar projects. Deliverables for this project will include a review by the original author, the project manager, and the project director or a designated quality assurance reviewer. If the project has a design aspect to it, a second engineer will review the design for constructability.

Having several senior professionals review documents prior to submittal increases the quality of the document and decreases the chances of a regulatory question on the report.

Schedule Control

Meeting and exceeding Lake County's expectations is of utmost importance to the project team. Part of the expectations is with schedule and budget control. The project manager will be responsible for the project schedule and budget. The project manager will use the following tools to set expectations, schedules, and budgets:

- Meeting with the County. Clear communication is critical to a successful project.
 - During the initial meeting with Lake County personnel, we will discuss the preferred forms of communications (in person meetings, telephone conference calls, email, or

- text messaging). The preferred form of communication will be implemented first followed by other forms, as needed.
- The team (CEC and Lake County) will discuss what aspects of the project were liked and areas that should be improved.
 - The project expectations will be discussed.
 - The project schedule will be set, including due dates for drafts and final deliverables.
 - The project budget will be discussed
 - Understanding aspects of the project that may affect the schedule, budget, and deliverables.
- Regular discussions with the County's field technicians and the County's contracted laboratory. This will facilitate project expectations and schedules. Schedules will be set at the beginning of the contract term and if unforeseen circumstances should occur the schedule can be slightly altered while maintaining required submittal dates with the FDEP.
 - Regular discussions with Lake County Personnel (schedule and frequency to be determined during the initial meeting) to update the County on progress, schedule, and budgets.
 - CEC has invested in technology to allow seamless inter-office teamwork. Through the use of this technology, the challenges of the past have been fixed, allowing the ease of file sharing and working together on projects. With our technology upgrade we are able to share screens across locations to allow team members to virtually come together and see what other team members are seeing. This allows CEC to work together to come up with new and innovative solutions.

Safety Program

CEC has a comprehensive health and safety program for all personnel. We take safety seriously and ensure that our personnel and subcontractors follow our and our client's safety procedures. Our employees are (at a minimum) all OSHA HAZWOPER 40-hr certified, First Aid trained, participate in annual 8-hr OSHA refresher training as well as weekly CEC health and safety training conference calls. Construction crews undergo additional specialized training in equipment operation, trenching safety, gas well drilling, and landfill gas construction safety. All field employees have company-issued personal gas detection meters, first aid kits, fire extinguishers, and other personal protective equipment required for their safety. CEC's minimum OSHA safety protection level is Level D and we can offer higher levels of OSHA worker protection if required. CEC has also voluntarily enrolled in a drug testing program with a national company, Nationwide Testing Association (NTA). All employees are required to pass an initial drug screening and then are put into a national pool and are from time to time randomly selected for drug testing; therefore, giving us the highest assurance that we operate and will continue to operate a drug free workplace.



CEC develops a site-specific Health and Safety Plan for each site with significant safety risks prior to commencement of activities. We also have a Corporate Health and Safety Plan that all employees must follow and is reviewed with employees at our annual safety training classes. Superintendents and Project Managers attend quarterly and monthly safety training meetings that review safety procedures, the status of safety equipment, and any incidents or close-calls.

At CEC, we strive always to perform our work in a professional, productive, safe, and high-quality manner. Concern for the safety of our employees is our greatest responsibility along with safeguarding the general public and our client's property. Safety is an integral part of how we do business and we have adopted

a comprehensive plan to carry out that philosophy. Our policy is to provide a safe working environment, free of hazards, and to provide adequate safety devices and all required training to all employees. It is our goal to create safety awareness among our employees so that each individual understands that they have the ultimate responsibility to work safely. It is our ultimate goal to eliminate unsafe practices and conditions, and to have zero accidents and injuries.

In order to help achieve this goal, all employees who work in the field are distributed a safety sheet about a different topic every week. On Fridays, we attend a conference call to discuss that week's safety subject in detail. By bringing safety to the forefront every week, we help our employees maintain an awareness to work and act safely.