



A NEW DAY.

# City of Jacksonville, Florida

*Donna Deegan, Mayor*

Office of Administrative Services  
Environmental Quality Division  
214 N. Hogan Street, 5<sup>th</sup> Floor  
Jacksonville, Florida 32202  
(904) 255-7100  
[www.jacksonville.gov](http://www.jacksonville.gov)

**E-mail:**

[alek@lionconstructioncompany.com](mailto:alek@lionconstructioncompany.com)

Lion Construction Inc  
5342 Clark Road, Suite 132  
Sarasota, Florida 34233

**RE: Cease and Desist Citation WP-25-12**

**Jacksonville Mini-Storage construction project at Real Estate ID Number (RE) 161675-0007, addressed at 9383 Merrill Road, Jacksonville, Florida (the "Project" at the "Property")  
Illicit discharge of non-stormwater to the MS4; and emissions of fugitive particulate to public right-of-way causing a nuisance**

## **Consent Order**

The purpose of this letter is to complete the resolution of violations of the City of Jacksonville Environmental Protection Board (JEPB) Rules 2 and 3. as identified by the City of Jacksonville, Neighborhoods Department in Cease-and-Desist Citation **WP-25-12** (the "Citation"), a copy of which is attached as Exhibit A and incorporated herein. The corrective action was completed by establishing best management practices through site cleaning and housekeeping steps to control the rasping of EPS foam board. To complete the resolution of this case, the payment of a civil penalty of **\$2,300** is required. The check shall be made payable to the City of Jacksonville **Environmental Protection Trust Fund** and shall be mailed to the Department's Environmental Quality Division ("EQD") at **214 N. Hogan Street, Fifth Floor, Jacksonville, FL 32202** and **Reference WP-25-12** within 30 days after approval of this agreement by the JEPB. *EQD cannot accept this payment until after JEPB approval. Do not submit payment until receipt of a fully executed Consent Order with the JEPB Chair signature.*

Payment of such amount does not constitute, nor shall it be construed as, an admission of liability or wrongdoing for any allegations in the Citation.

Your signing of this letter constitutes your agreement to the terms of the letter. After this letter has been countersigned by the Department and approved by the JEPB, this letter shall constitute a consent order and final action on behalf of the Department and full satisfaction of the Citation and the matters alleged in the Citation. The terms of the consent order may be enforced in a court of competent jurisdiction, pursuant to Jacksonville Ordinance Code Chapter 360. Failure to comply with the terms of this consent order may constitute a violation of Jacksonville Ordinance Code Section 362.110.

The Department for, and in consideration of, the timely performance by the Respondent of the obligation agreed to in this consent order, hereby waives any rights to seek administrative or judicial imposition of civil and administrative action, complaints, citations, causes of action, and claims arising from the Citation. The Respondent waives its right to an administrative hearing on, or judicial review of, the terms of this consent order.

Consent Order WP-25-12

Page 2

Failure to sign and return this document to the Department on or before **May 30, 2025**, will be assumed to be a rejection of the settlement agreement contained herein. This matter will then be referred to the City's Office of General Counsel for further action.

**CITY OF JACKSONVILLE  
NEIGHBORHOODS DEPARTMENT**

6/26/2025

Date

Signed by:  
*Richard Reichard*  
3196CABD731495...

Richard A. Reichard  
Office of Administrative Services

**Lion Construction Inc**

6/25/2025

Date

DocuSigned by:  
*Alek Bynzar*  
239FBAE2DCE4AF...

Print Name: Alek Bynzar

Print Title: pm

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**ORDER**

I hereby certify that the foregoing document was adopted by order of the Environmental Protection Board of the City of Jacksonville this 21 day of July, 20 25.

Signed by:  
*Thomas Deck*  
767AB406964445...

Thomas Deck, Chair  
Environmental Protection Board