

Jeb Bush
Governor

Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

CERTIFIED MAIL 7004 0750 0003 0516 2017

April 3, 2006

RETURN RECEIPT REQUESTED

In the matter of an

Application for Permit by:

DEP File No. 126941-004-SO/MM,
Sumter County

Bernard Dew, County Administrator
Sumter County Board of County Commissioners
200 N. Florida Avenue, Suite 3
Bushnell, Florida 33513-6146

NOTICE OF PERMIT DENIAL

The applicant, Sumter County Board of County Commissioners, applied on April 19, 2005, to the Department of Environmental Protection for a **modification** to the existing Solid Waste Processing Facility, referred to as the **Sumter County Material Recovery Facility**, located 1 mile east of Interstate 75, along the south side of C.R. 470, north of Bushnell, Sumter County, Florida.

The Department has permitting jurisdiction under Sections 403.707 and 403.861, Florida Statutes (F.S.), and Chapters 62-4 and 62-701, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a minor modification to a solid waste processing facility permit is required for the proposed work.

Pursuant to Rule 62-4.070(2), F.A.C., if, after review of the application and all the information, the Department determines that the applicant has not provided reasonable assurance that the construction, expansion, or operation of the installation will be in accord with

"More Protection, Less Process"

Printed on recycled paper.

applicable laws or rules, including rules of approved local programs, the Department shall deny the permit. The applicant has not provided reasonable assurance of demonstrating compliance with the requirements of Chapter 62-701, F.A.C., to the Department. The application does not comply with the following rule requirements:

1. Rule 62-701.320(1), F.A.C. A review of the permit modification request indicated that the original odor control system was subsequently replaced by an unpermitted alternate odor control system. Documentation (i.e. certification of construction completion documents) that demonstrates that the originally permitted odor control system was installed was not provided. Supporting information, documentation, engineering calculations, and full size "construction-level" drawings of sufficient detail to show how the alternate Hinsilblon odor control system is designed, constructed and operated was not provided.

2. Rule 62-701.320(5)(b), F.A.C., requires that information in every application shall be of sufficient detail to show how the facility will be constructed, operated, and closed and how it will be monitored and maintained after closure, in order to comply with the provisions of Chapter 62-701, F.A.C.

a. Memorandum titled "Change request for FORCE Proposal from RKB Enterprises Inc. and GOC Technologies submitted August 29, 2003," dated March 18, 2005: This memorandum makes several statements and claims regarding the proposed odor control system without providing adequate supporting information, documentation, and/or engineering calculations that demonstrate that the system will perform as indicated. The following comments regarding this memorandum were not addressed and a revised proposal with the following information was not provided.

1) The title of this memorandum and the section titled "Modification of the Original Agreement" appears to request a change to the existing FORCE proposal, however the cover letter for the modification indicates that "the test period ended" and "FORCE is currently in the process of submitting a final report...." An explanation of these discrepancies was not provided.

2) Background: Supporting information and/or documentation that the proposed system is "A proven and reliable atomizing system..." for odor control as proposed at this facility and that "GOC Technologies 500 series products... are the non-vapor versions of the GOC's 900 series products," as is stated in this section of the memorandum was not provided.

3) New System Capabilities & Modification of the Original Agreement: Supporting information, documentation and engineering calculations that demonstrate the capability of the system to deliver treatment product in accordance with the specific design (e.g. number of nozzles; length, diameter, path of hose; capacity of unit; application rate; etc.), proposed at this facility was not provided.

4) New System Capabilities: Detailed vendor information, drawings, and specifications for the proposed odor control system was not provided.

5) New System Capabilities: A specific description of the proposed procedures for limiting the use of the system by the utilizing the "wind sensor," including the proposed criteria for determining "wind... blowing from a critical sector" and "spray times" was not provided.

6) New System Capabilities: The cover letter for this modification states, "Currently, the Odor Control System, as approved in the Permit Renewals... issued on April 30th, 2004, is still operating..." This section references the "currently installed Hinsilblon product and equipment." Since this does not appear to be the odor control system permitted by the Department, an explanation of this was not provided.

7) How will the change effect the trial: The "Evane-Zyme" does not appear to be the "originally proposed GOC 910UV" that was "approved in the Permit Renewals... issued on April 30th, 2004." An explanation of the reference to the "existing treatment product, Evane-Zyme" was not provided.

8) How will the change effect the trial: Supporting information, documentation and/or engineering calculations utilized to support the statements, "The existing treatment product, Evane-Zyme, has not been consistently effective in the field," "BAT 502... has the same active ingredients and performance as... GOC 910UV," and "the new performance is expected to be greatly improved over Evane-Zyme" was not provided.

2. Rules 62-701.320(5)(b), F.A.C. Attached Drawings (2 sheets), dated February 9, 2005: Construction drawings for the proposed odor control system that are full size "construction-level" drawings of sufficient detail to show how the odor control system is designed, installed and operated were not provided.

3. Rule 62-701.320(5)(b), F.A.C. BAT 502 Test Applications: Supporting information, documentation and engineering calculations that demonstrate that the proposed odor control system will provide the application rate and contact residence time for the BAT 502 solution described by this specification document was not provided.

The Department will **deny** the permit unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative (proceeding) hearing in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Blvd., Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this denial. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit denial. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition and to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C. Mediation is not available in this proceeding.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of permit denial. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

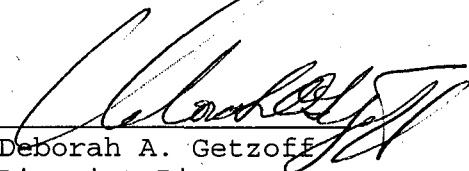
This action is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Chapters 62-110 and 28-106, F.A.C. Upon timely

filing a petition or a request for an extension of time, this permit denial will not be effective until further Order of the Department.

When the Order is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Blvd., Mail Station 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Deborah A. Getzoff
District Director
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this **NOTICE OF PERMIT DENIAL** and all copies were mailed before the close of business on **April 3, 2006** to the listed persons.

Date Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
Section 120.52(11), Florida
Statutes, with the designated
Department Clerk, receipt of which
is hereby acknowledged.

Anna Black
(Clerk)

04/03/2006
(Date)

DAG/sgm

Copies furnished to:

Sumter County Notification List
Joseph L. Miller, P.E., PBS&J, 482 S. Keller Rd., Orlando, FL 32804
Miriam Zimms, Kessler Consulting, Inc., 14620 N. Nebraska Ave., Tampa, FL 33613
Virginia Watson, Sumter County, 209 N. Florida Street, Bushnell, Florida 33513
Francine Joyal, FDEP Tallahassee
Patricia Comer, FDEP OGC
Susan Pelz, P.E., FDEP Tampa
Stephanie Watson, FDEP Tampa

Florida Department of Environmental Protection - Enterprise Applications

Query Coll Print End Edit CP Window

ORACLE

Collection Point Log Remittance

AREA **SND** Total **CRAF006A \$100.00**

Remittance **616599** Type **20** Received Date **04/19/2005** Status **RECEIVED**

SYSRCPT **498351** PNR Check # **45617** Amount **100.00**

SSNFE# Name **SUMTER COUNTY BOCC**

First Middle Title Suf

Address1 **209 N FLORIDA ST** Short Comments

Address2 **SO 126941-094**

City **BUSHNELL** ST **FL** Zip **33513** Country

Distr

PAYMENTS

Payment	Area	Object	Code/Description	Payment Amount	Reference#	Applic Fund	Status
673409	SND	082246	SOLID WASTE OPT	\$100.00		PA PETE	COMPLETE

COMMIT FREQUENTLY **\$100.00** Payment total

Florida Department of Environmental Protection - Enterprise Applications

Permits Events Payments Site Family Party List Help Edit Window

ORACLE

Refunding Application - Permit Detail and Log Permit

SITE Permit

Site Name **SUMTER CO. MRF (MRF)** Site # **0126941**

County **SUMTER** Comments **N** RPAs **N** # Cases **0**

Project

Permit # Project # **004** Received **04/19/2005** CRA # **214726**

Permit Office **SND (DISTRICT)** Agency Action **Pending**

Project Name **SUMTER COUNTY MATERIALS** Desc **Processing Facility**

Type/Sub/Des **SO** **IN** **INTERMEDIATE MODIFICATION** COE #

Logged **04/21/2005** Issued Expires OGC

Fee **100.00** Fee Recd **100.00** Date Override **SMALL CO. WARY**

Related Party

Role **APPLICANT** Begin **04/21/2005** End

Name **DEW, BERNARD** Company **SUMTER COUNTY BOCC**

Address **209 N. FLORIDA AVENUE**

City **BUSHNELL** State **FL** Zip **33513** Country **U.S.A.**

Phone **352-793-0200** Fax Email

Processors

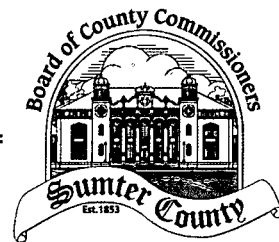
Processor **MORGAN S** Active **04/21/2005** Inactive Events

Permitting Application - Events						
Events Scheduled				18	of	90
Site #	0126941	Site Name	SUMTER CO. MRF (MRF)			
Permit #		Type/Subtype	SO	/	IM	Received 04/19/2005
Project #	004	Project Name	SUMTER COUNTY MATERIALS			
<div> DENY PERMIT: Denied </div>						
Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Receive Request	04/19/2005	1	04/20/2005		Done	04/19/2005
Fee Verification	04/19/2005	2	04/21/2005		Sufficient Fee	04/23/2005
Completeness Review	04/19/2005	30	05/19/2005		Incomplete	05/19/2005
RESET CLOCK	05/19/2005	1	05/20/2005		Done	05/19/2005
Awaiting Additional Information	05/19/2005	45	07/03/2005		Received	01/20/2006
Completeness Review	01/20/2006	30	02/19/2006		Complete	01/20/2006
Determine Agency Action	01/20/2006	90	04/20/2006		Deny	04/03/2006
Deny Final Permit	04/03/2006	14	04/17/2006		Denied	04/03/2006
DENY PERMIT	04/03/2006	1	04/04/2006		Denied	04/03/2006
STOP CLOCK	04/03/2006	1	04/04/2006		Done	04/03/2006

SUMTER COUNTY PUBLIC WORKS

SUMTER COUNTY, FLORIDA

319 E. Anderson Avenue • Bushnell, FL 33513 • Phone (352) 793-0240 • Fax (352) 793-0247 • SunCom 665-0240 • www.scpw.org



August 28, 2006

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

AUG 31 2006

SOUTHWEST DISTRICT
TAMPA

Susan Pelz
Solid Waste Manager
Southwest District
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

Re: Sumter County Odor Control System
Permits: No 126941-003-SO (MRF) and No. 126940-010-SO (Compost)

Dear Ms. Pelz:

In a letter dated May 19, 2006 FDEP responded to Sumter County's (County) April 7, 2005 letter and application for a permit modification relating to the County's Material Processing Facility and Composting Facility. This application was for approval of an alternate odor control system to the one actually installed at the facility because the County felt that the proposed alternate system would be at least as effective, if not more effective, and less expensive to operate. Subsequent to this application, the cost to operate the installed system was substantially reduced, and the county abandoned that permit application. The County did not withdraw their application, and FDEP eventually denied the application due to no further activity on the application.

However, in FDEP's May letter referenced above, FDEP stated in Paragraph 1, "Please be advised that the installation and operation of an alternate odor control system constitutes a modification of the facility without authorization from the Department and may subject the applicant to enforcement action by the Department."

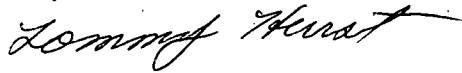
Since that time, on behalf of the County, PBS&J has been in communication with FDEP to explain that the system as installed is substantially the same system as proposed by RKB Enterprises dated August 29, 2003 and permitted by FDEP in Permit #126941-003-SO dated April 30, 2004.

Accompanying this letter is a signed and sealed narrative to Mr. Steven G. Morgan from our engineer of record, Mr. Joseph Miller, per Specific Condition 6.c. of Permit No. 126941-003-SO. Additionally, all other required materials noted in Specific Condition 6 of said Permit are

Ms. Susan Pelz
August 28, 2006
Page 2

also attached. We hope that the COC, equipment and tubing sketches, and Mr. Miller's email satisfactorily resolves this matter with the FDEP.

Sincerely,



Tommy Hurst
Public Works Director
Sumter County

Attachment

xc: Sandra Howell, Sumter County Administration
Jackey Jackson, Sumter County Public Works
Denise Warnock, Sumter County Public Works
Richard L Potts, Jr. P.G., The Colinas Group
David Deans, Post, Buckley, Schuh & Jernigan, Inc.
Joseph Miller, Post, Buckley, Schuh & Jernigan, Inc.
Steven Morgan, Florida DEP
John Morris, Florida DEP
Mitch Kessler/Miriam Zimms, Kessler Consulting, Inc.



An employee-owned company

Sumter CO MRF
Pump File

August 14, 2006

Mr. Steven G. Morgan
Solid Waste Section
Southwest District
Department of Environmental Protection
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

AUG 31 2006

SOUTHWEST DISTRICT
TAMPA

RE: Certification of Construction Completion
Sumter County Solid Waste Composting & Recycling Facility
Odor Control System Modification
Permit Nos.: 126941-003-SO-Material Processing Facility
126940-010-SF-Composting Facility

Dear Mr. Morgan:

As we discussed on the telephone, PBS&J is resubmitting the certification of construction completion with sketches showing the location of the odor control system installed, and this letter clarifying that the system installed is in substantial accordance with the plans authorized.

The odor control system was permitted under FDEP Permit # 126941-003-SO dated 4/30/2004 for the Sumter County Materials Recovery Facility. Specific Condition 2.i. states: "Proposal for GOC-Vapor, Odor Control at FORCE Sumter County, FL. - From RKB Enterprises, Inc. and GOC Technologies, dated August 29, 2003 (received February 2, 2004)." Also, Specific Condition 3.d. states "This permit authorizes construction and operation of the odor abatement and control system (ref.SC#2.i)."

The August 29, 2003 proposal letter was prepared for RKB Enterprises, Inc. by Bob Broom. In the proposal, he describes the odor control system as a system of pipes and nozzles to spray GOC-Vapor 911UV at the MSW Tipping Building floor, and GOC-Vapor 910UV at the Biosolids Tipping Area. There were no sketches or 24" by 36" construction drawings included with the proposal. The proposal has only a general description of the areas to be treated for odor. The proposal does not give the chemical composition of the compounds because the contents of the compounds are proprietary. The proposal describes the control unit as "A wall mounted box containing the electronics and plumbing to produce a vapor (gas) deodorizer."

A memorandum dated June 28, 2004 from Bob Broom requested approval to change their August 29, 2003 proposal for odor control. In this memorandum he says that new technologies have emerged. He states: "In April 2004 GOC concluded more than a year of

Steve Morgan, FDEP

8/14/2006

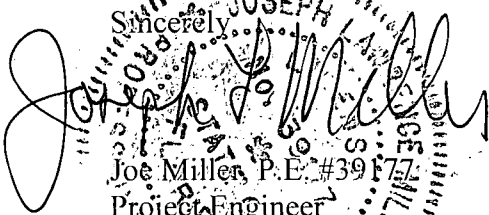
Page 2 of 2

testing resulting in the adaptation of the GOC product "GOC 910UV to perform in tandem with equipment manufactured by the Florida based odor control company, Hinsilblon. The new product is called Evane/Zyme + Evane Scent (EZ-ES)....The treatment product EZ-ES has the same active ingredients as GOC 910UV and therefore the performance is expected to be unchanged."

Sumter County accepted the installation of the EZ-ES system with the Hinsilblon equipment based on the recommendation from Bob Broom that the EZ-ES system had the same active ingredient and would be more effective with the Hinsilblon equipment to control odors. It is our understanding that FDEP has observed this system in operation, and had no problems with the system as it was installed and operating.

In summary, the EZ-ES odor control system has, according to the supplier, the same active ingredients as the GOC-Vapor 910UV and the GOC-Vapor 911UV. Since the contents are proprietary that can not be confirmed. But we understand the odor complaints have stopped, and the active ingredients in the EZ-ES are working. For odor control systems, that is the best test. Since the original letter did not describe the specific equipment, the Hinsilblon equipment, which is working effectively, should be acceptable to FDEP as it is a ".box containing the electronics and plumbing to produce a vapor (gas) deodorizer."

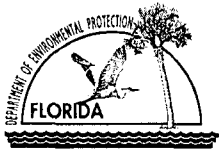
In conclusion, the EZ-ES odor control system installed, to the best of our knowledge, is the renamed GOC odor control system in the August 29, 2003 proposal. The system has been working satisfactorily to eliminate odors since the system was installed between December 7 and 10, 2004, and the system should be acceptable to FDEP.

Sincerely,

Joe Miller, P.E. #39177
Project Engineer

cc: Miriam Zimms, Kessler Consulting, Inc.
Tommy Hurst, Sumter County Director of Public Works
Sandra Howell, Sumter County Assistant Administrator

U:\SO\Projects\SUMTER\Odor Control\June 8, 2006 ltr.doc

PBS



Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

DEP Form # 62-701.900(2)
Form Title Certification of Construction Completion
Effective Date May 19, 1994
DEP Application No. _____
(Filed by DEP)

Certification of Construction Completion of a Solid Waste Management Facility

DEP Construction Permit No: 126941-003SO&126940-010SO County: Sumter

Name of Project: Sumter County Solid Waste Management Facility

Name of Owner: Sumter County Board of County Commissioners

Name of Engineer: Joe Miller, PBS&J, 482 S. Keller Rd., Orlando, FL. 32810

Type of Project: Odor Control System for Biosolids Tipping Floor and MSW Transfer Station. Permits
No. 126940-010-SO Composting Facility Operation & No. 126941-003-SO Materials Recovery Facility.

Cost: Estimate \$ 30,000 Actual \$ 30,000

Site Design: Quantity: N/A ton/day Site Acreage: N/A Acres

Deviations from Plans and Application Approved by DEP: A Hinsilblon HLDA-100 vapor unit was
installed with 2" flex hose over the leeward truck access door to the Materials Recovery Facility.

A Hinsilblon-300 vapor unit was installed with 3" flex hose over the biosolids tipping floor, hopper and
belt conveyor feeding the mixer. The vapor generating units spray Evane/Scent during working hours
as needed to control odors.

Address and Telephone No. of Site: 835 CR 529, Lake Panasoffkee, FL 33538

Telephone #352-793-3368

Name(s) of Site Supervisor: Tommy Hurst or Jackie Jackson

Date Site inspection is requested: At the convenience of FDEP.

This is to certify that, with the exception of any deviation noted above, the construction of the
project has been completed in substantial accordance with the plans authorized by Construction

Permit No. 126941-003-SO & 126940-010-SO :Dated: 04/30/2004 & 04/30/2004

Date: January 10, 2006

Joseph P. Miller
Signature of Professional Engineer
No. PP-1777
Page 1 of 1
STATE OF FLORIDA
PROFESSIONAL ENGINEER

Northwest District
160 Governmental Center
Pensacola, FL 32501-5794
850-595-8360

Northeast District
7825 Baymeadows Way, Ste. B200
Jacksonville, FL 32256-7590
904-448-4300

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
407-894-7555

Southwest District
3804 Coconut Palm Dr.
Tampa, FL 33619
813-744-6100

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33901-3881
941-332-6975

Southeast District
400 North Congress Ave.
West Palm Beach, FL 33401
561-681-6600

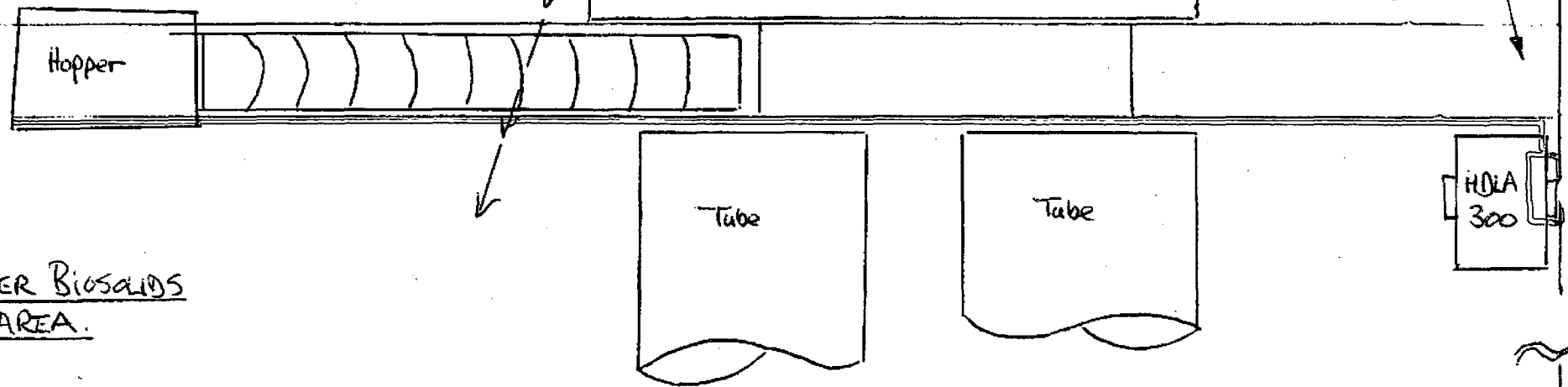
Feb 9, 2005.

PLAN

Biosolids
loading
↓

Biosolids tipping and storage area
↓
Problem Wind Direction.

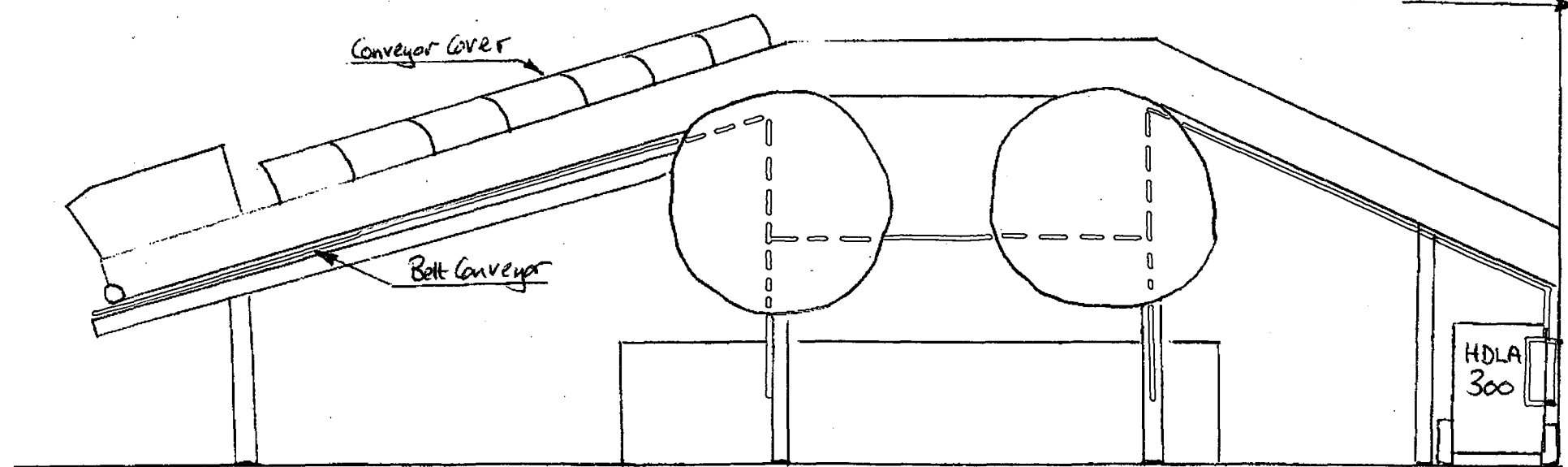
MSW
Loading
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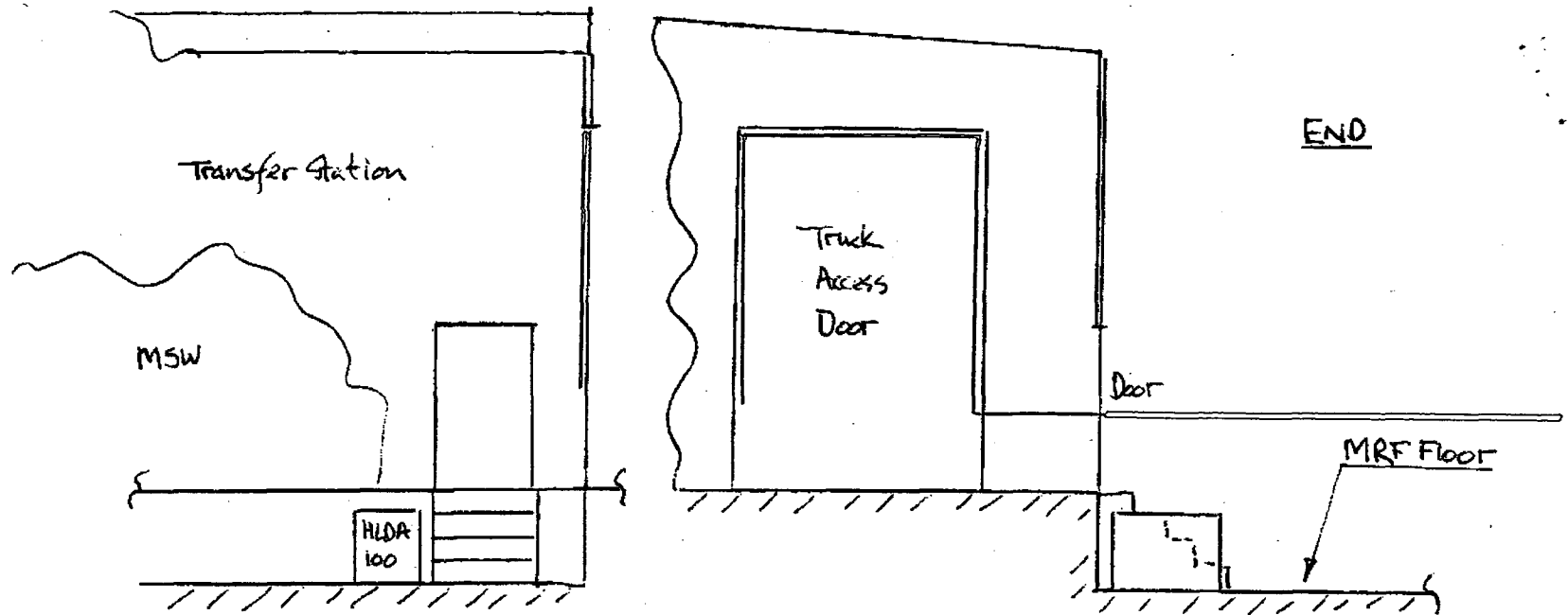
SUMMER BIOSOLIDS
AREA.

FRONT ELEVATION

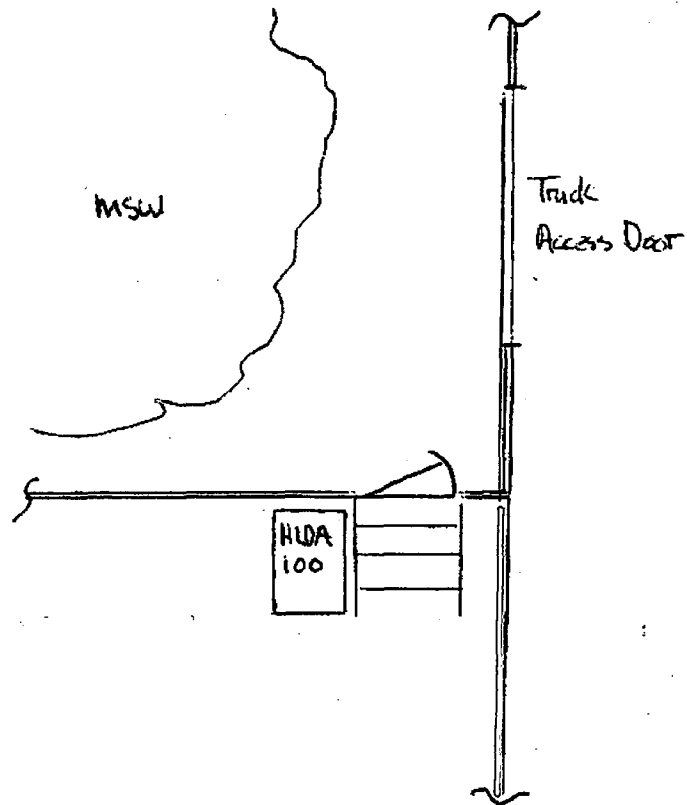
MSW
DRF
→



SIDE



PLAN



Morgan, Steve

From: Miller, Joseph L. [JLMiller@pbsj.com]
Sent: Wednesday, May 03, 2006 3:28 PM
To: Morgan, Steve
Cc: Miriam Zimms; Deans, David E.
Subject: Sumter County MRF Odor Control System

Steve,

As we discussed on the telephone, I researched the files to determine the differences between the odor control system as permitted and the odor control system as constructed. Here is a summary of what I found.

The odor control system was permitted under FDEP Permit # 126941-003-SO dated 4/30/2004 for the Sumter County Materials Recovery Facility. Specific Condition 2.i. states: "Proposal for GOC-Vapor, Odor Control at FORCE Sumter County, FL. - From RKB Enterprises, Inc. and GOC Technologies, dated August 29, 2003 (received February 2, 2004)." Also, Specific Condition 3.d. states "This permit authorizes construction and operation of the odor abatement and control system (ref.SC#2.i.)." The August 29, 2003 proposal letter is attached to this e-mail for reference. The proposal, prepared by Bob Broom, describes the odor control system as a system of pipes and nozzles to spray GOC-Vapor 911UV at the MSW Tipping Building for, and GOC-Vapor 910UV at the Biosolids Tipping Area. There were no sketches or 24" by 36" construction drawings included with the proposal, or referenced in the proposal. There is only a description of the areas to be treated for odor. There is no specific description of the equipment to be used to spray the odor control agents other than the equipment is for the GOC product. The proposal does not give the chemical composition, but states that contents are proprietary. Copies of the material safety data sheet (MSDS) are also attached to this e-mail for reference.

In a letter dated March 5, 2004 from Bob Broom, the odor control system was further described and a sketch was included to show the areas for the treatment. A copy of this letter is attached to this e-mail. As stated in the letter, the March 5 2004 letter was "... clarification to verbal answers provided at the December 1st 2003 meeting with DEP." Bob Broom wrote this letter to answer questions from FDEP submitted to him by Kessler Consulting's Miriam Zimms in a March 3, 2004 e-mail. Her complete e-mail is included in the file with the March 5, 2004 letter. Point 6 in Miriam's e-mail is as follows: "6. They (FDEP) would like to know where the piping will be placed; orientation of the holes in the piping. They (FDEP) do not need an engineering drawing, a sketch is fine." Based on the March 5, 2004 letter, Miriam's e-mail and a review of the files, we do not believe a signed and sealed engineering drawing was ever produced for the odor control system.

A memorandum dated June 28, 2004 from Bob Broom requested approval to change their August 29, 2003 proposal for odor control. A copy of this memorandum is attached to this e-mail for reference. In this memorandum he says that new technologies have emerged. He states: "In April 2004 GOC concluded more than a year of testing resulting in the adaptation of the GOC product "GOC 910UV to perform in tandem with equipment manufactured by the Florida based odor control company, Hinsilblon. The new product is called Evane/Zyme + Evane Scent (EZ-ES). The treatment product EZ-ES has the same active ingredients as GOC 910UV and therefore the performance is expected to be unchanged." The EZ-ES system with the Hinsilblon equipment is what was installed based on the belief that the EZ-ES had the same active ingredient and would be more effective with the Hinsilblon equipment to give a better system for delivering odor control. It is our understanding that FDEP has observed this system in operation, and had no problems with the system as it was installed and operating.

In the files we found a February 12, 2005 letter, again from Bob Broom, with two schematics of the odor control system as currently installed at the Sumter County MRF. A copy of this letter with the sketches is attached to this e-mail.

In summary, the odor control agent EZ-ES has, according to the supplier, the same active ingredients as the GOC-Vapor 910UV and the GOC-Vapor 911UV. Since the contents are proprietary that can not be confirmed. But since, as we understand it, the odor complaints have stopped, the active ingredients in the EZ-ES are working, and in odor control that is the most important thing. Since odors are subjective and can not be measured except by the nose, it is difficult to quantitatively compare products. Also the Hinsilblon equipment is better than the GOC

5/5/2006

equipment proposed in the August 29, 2003 letter to deliver the odor control agents into the air. Since the original letter did not describe the specific equipment, the Hinsiblon equipment, which is working effectively, should be acceptable to FDEP.

In conclusion, the EZ-ES odor control agents are effectively equal to the GOC odor control agents in the August 29, 2003 proposal. The system has been working satisfactorily to eliminate odors since the system was installed between December 7 and 10, 2004, and the odor complaints have stopped. There are no engineering drawings for the odor control system.

FILE

RKBEnterprises, Inc.

625 Maury Ave, Norfolk VA 23517
757-622-0692 rkbe@cox.net

Friday, March 05, 2004

Miriam Zimms
Kessler Consultants, Inc.
14620 N. Nebraska Ave., Bldg. D
Tampa, FL 33613

RE: Question from meeting with DEP on December 1st 2003 - FORCE

Dear Miriam:

As requested in your March 3rd e-mail please find attached additional information and clarification to verbal answers provided at the December 1st 2003 meeting with DEP.

Please contact me with questions at 757-622-0692, or on my mobile at 757-647-6052 or rkbe@cox.net.

Sincerely,



Bob Broom
RKB Enterprises, Inc.

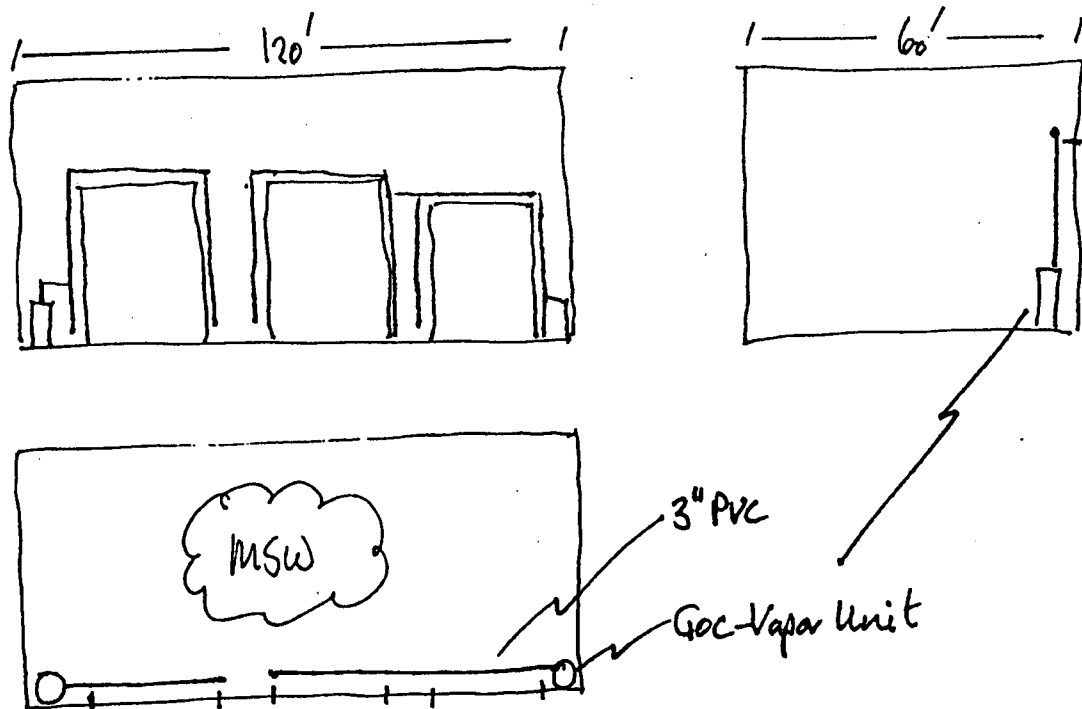
Encl: DEP meeting - additional information

1. Presentation: Update forwarded.
2. Testing: The collection of odor data is not within the scope of this grant. I will liaise with Chuck Jett, Sumter Manager, to produce a plan for subjective assessment testing, but, the accumulation of odor data is not possible without significant additional funding. Manually logging data has been discussed with Mr. Jett; a staff member has been identified as the primary record keeper for this task. The entire on-site staff will be briefed to provide feedback on any changes, which will be recorded in the data log. This procedure, even with a high level of diligence will not be perfect. I have informed Mr. Jett that as much information relating to the hour by hour operation of the facility and the movements of materials must be documented. This will include areas not treated for odor. Of particular concern is the potential for odor from the windrows which have been recognized as a source of odor in the past. This grant provides treatment to bio-chemically change odorous gases into other non-odorous forms. It is practical action for nuisance odors. No odor measurements will be taken.
3. Vapor-phase, re-condensing: Part of the vapor produced will re-condense. The vapor will, however, be routed through 3 inch PVC piping to the treated area. Condensate will return to the well along the same route to the GOC Vapor unit via the PVC piping. Product loss will therefore be minimized.
4. MSDS previously forwarded.
5. Vapor is produced by a negative ion ionizer. The liquid treatment product is pumped from a 55-gal drum into a holding well in which the ionizer is sitting. Vapor is generated at the surface of the liquid and routed via PVC piping to the required treatment area.
6. Perhaps a description will suffice: In the MSW tipping building 115V power is available on the north wall. Locations, safe from vehicle movements are the NE and NW corners of the buildings. The public access door on the eastern side of the building has recently been closed. Odor, therefore, has the greatest potential to escape the building through the three doors in the north wall. The northeast and central doors are 14ft wide x 16ft high. The northwest door is 14ft wide x 14ft high. PVC piping will run vertically along the edge of the three doors. Holes will be drilled to face the open doorway. The number of holes drilled will not be decided until the air flow around

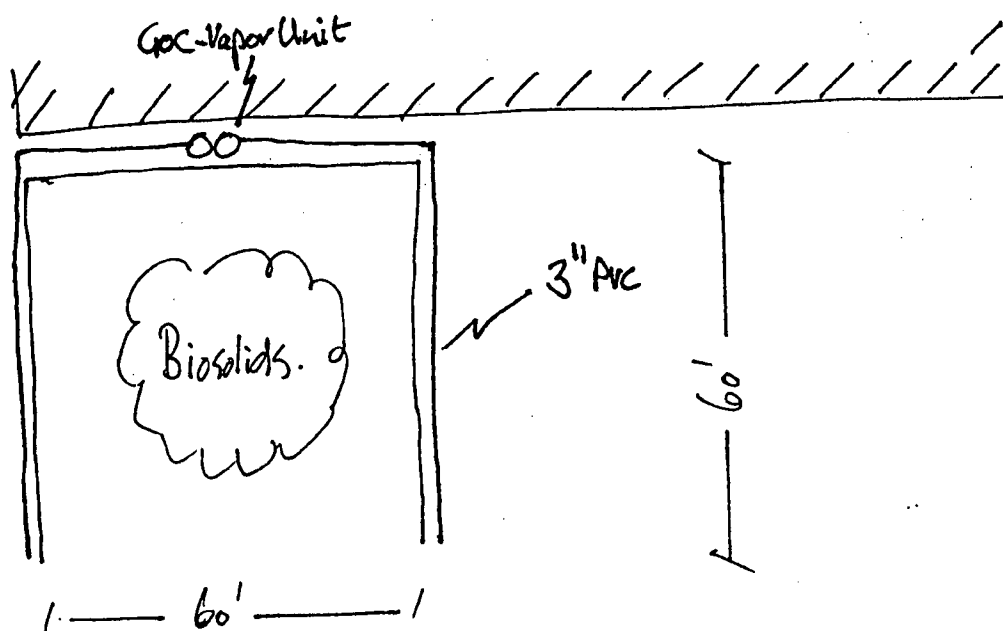
the doors has been determined; but, it is estimated that six holes will be drilled at 1ft to 3ft intervals on each side of each door. The tipping area for biosolids is approximately 60ft x 60ft and is located on the southeast side of the sorting building. 115 V power is available on the southern wall. PVC piping will be run to either side of the tipping area. The GOC-vapor units will be on the south wall. It is assumed that the best performance will be achieved if the holes are in the top of the PVC piping with more hole at the far end to aid the even distribution of vapor; the average hole spacing is expected to be 3ft to 4ft.

7. The system function will be checked daily by a Sumter staff member. I will be contacted immediately if there is a failure. Replacement parts will be supplied expeditiously. As there are few moving parts these units normally operated for long periods of time without attention.
8. The equipment and treatment process identified for this grant are not suitable to treat open areas such as the windrows. Sumter has previously purchased the topical spray BAT 508 to treat these types of area for odor. Within the scope of the grant, treatment will be limited to the MSW tipping building and the area immediately adjacent to the biosolids tipping area. These areas were selected as they have the highest potential for odor of any within the facility.

MSW Tipping Building



Biosolids Tipping Area



Miriam Zimms

From: Bob Broom [rkbe@cox.net]
Sent: Wednesday, March 03, 2004 12:32 PM
To: Miriam Zimms
Subject: Re: Follow-up - R&D - Reply

Miriam: I'll work on the list. The owner of GOC left for Europe yesterday. I will not easily be able to discuss this with him until he gets back in ten days. So, I will do my best to give you an immediate answer, by letter, but I may amend or update my statements when he returns.

I have questions for you. I really thought I had passed the testing question. The answer is that I can't do it. I will liaise with Chuck Jett and give you a plan for subjective assessment testing, but, it is not possible without funding to accumulate odor data. At the USCC conference Todd Williams of Tetra Tech was a speaker on odor modeling. When questioned from the floor as to the cost, he tap-danced. No change from \$100K for very basic data is the reality.

Bottom line, my grant is to do something practical about the odor; I will have to rely on the on-site people to provide feedback on any changes, using a manual entry log. This is also not perfect. My concern is odor from the Sumter windrows which is not an area I am treating, but, I am certain they cause odor problems from time to time. So Chuck and I will have to account for that.

Can you identify for me which of these questions is information vital to the permit and which you feel are just questions? All of them!? Okay. Is the permit really holding this up?

Regards,

Bob Broom
RKB Enterprises, Inc
625 Maury Ave.
Norfolk, VA 23517
757-622-0692
757-640-0239 FAX
757-647-6052 Mobile
rkbe@cox.net

— Original Message —

From: Miriam Zimms
To: Bob Broom (E-mail) ; Bob Broom (E-mail)
Cc: Bernard Dew (E-mail) ; Denise Warnock (E-mail) ; Joan Bradshaw (E-mail)
Sent: Wednesday, March 03, 2004 9:50 AM
Subject: Follow-up - R&D

Hi Bob-

I hope all is going well.

I was going over the notes from the meeting you/we had with the DEP and I wanted to make sure we have everything from you relative to your project that they requested. These are my notes from the DEP's comments. Although you answered many of these questions at that meeting, I believe we need it in writing to attach to other documentation as we move closer to initiating this project so that we provide it in writing to the DEP so that it does not come up again.

1. The information in your presentation was not current regarding the equipment to be use at Sumter. Action: Can you revise your presentation to reflect this and transmit to me?

2. Odors to be "tested" at the facility will be part of the R&D project. How will the system be monitored - odor measured?

3. What keeps it from recondensing?

4. Chemical Analysis of the agent itself? No action. You provided the MSDS sheets.

5. How is the vapor produced?

6. They would like to know where the piping will be placed; orientation of the holes in the piping. They do not need an engineering drawing, a sketch is fine.

7. How will the system be monitored?

8. Suggest that the R&D project test various areas at different times (e.g. sludge area, windrows, etc.)

Would you provide responses to these questions in a letter addressed to me as a follow-up to the DEP meeting on 12/1/03 and my request to you today? Please copy Bernard Dew and Joan on this letter to me. We will attach this letter to your contract with the County and I will forward it to the DEP as appropriate.

Call me if you have any questions. You and Joan may want to also check your own notes from that meeting and see if there is anything else that is missing.

Thank you,

Miriam Zimms
Kessler Consulting, Inc.
www.kesconsult.com
813-971-8333, x 22

Celebrating 15 Years of Quality Service
EPA WasteWise Small Business Program Champion
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TO: Bernard Dew, FORCE Director
Mitch Kessler, FORCE Director

FROM: Bob Broom,
RKB Enterprises, Inc,
625 Maury Ave.
Norfolk, VA 23517

RE: Change Request for FORCE Proposal from RKB Enterprises,
Inc. and GOC technologies submitted August 29, 2003.

DATE: June 28, 2004

This memo is a request to modify and update the RKB Enterprises, Inc. and GOC Technologies FORCE grant proposal submitted August 29, 2003. Since the original proposal was submitted ten months ago, new technologies have emerged in the industry warranting modifications in the FORCE grant project. I have outlined justification for project modifications and the resulting benefits of these upgrades:

Upgrade #1: Odor control technology had been stagnant for years but in the year 2000 GOC Technologies introduced a unique approach to air contract treatment – Vapor Technology. In April 2004 GOC concluded more than a year of testing resulting in the adaptation of the GOC product "GOC 910UV" to perform in tandem with equipment manufactured by the Florida based odor control company, Hinsilblon. The new product is call Evane/Zyme + Evane Scent (EZ-ES). The delay in starting the demonstration has enabled the new combined GOC – Hinsilblon product and equipment to be available for use in the FORCE project.

How will the change effect the trial?

The principle concepts for FORCE the demonstration project will be unchanged. The scope and duration are unchanged. The new hardware is more appropriate for an industrial application and has been adapted from existing Hinsilblon equipment with proven long term reliability. The treatment product EZ-ES has the same active ingredients as GOC 910UV and therefore the performance is expected to be unchanged.

Benefit to Sumter County:

A. *Post trial costs:* The combined operating cost of the four GOC Vapor units was expected to range from \$2,000 to \$5,000 per month; intermittent operation controlled by a timer was used to keep costs down.

The new system will operate 24 hours per day, seven days per week, plus, provide expanded coverage around the biosolids tipping area beyond the scope of the original system.

After the trial, if an annual contract is acceptable to the county, the biosolids system will cost \$ 2,160 monthly and the unit in the transfer station doorway \$ 720 monthly.

B. Equipment lease or purchase: The purchase price of the new equipment – HLDA100 and HLDA300 exceeds the full grant amount of \$25,000. Special arrangements will therefore be made to lease the equipment. This provides options for the county and will allow for future equipment upgrades without new purchases. The lease also allows for the larger more robust systems to be used for the trial without increasing the total dollar amount of the grant.

Modifications of the Agreement:

Section I:

A: Modify language throughout "GOC Vapor 911UV and GOC Vapor 910UV" to read Evane/Zyme + Evane Scent

B. Modify language to read:

MSW Tipping Building: treatment with Evane/Zyme + Evane Scent, an air contact product. The MSW Tipping Building is located at the northern end of the building; although the four truck access doors are mostly left open it is by design an enclosed space – 250,000 cu ft (120'x 60'x 35').

The purpose of the treatment is to control odor to unnoticeable levels downwind of the building. Under normal conditions, a Hinsilblon HLDA100 system is needed, running continuously or as needed. Nozzles are not required with GOC Vapor. The system requires a 115/1/60 14.5 amp power supply. Vapor is distributed using 2" HDPE piping and Camclock hose. Holes are drilled in the piping (3/16 inch diameter) to release the vapor where it is needed. More holes, and therefore, more vapors will be delivered to likely odorous locations. It is simple to make adjustments to the distribution of vapor by either drilling more holes or sealing existing holes.

Biosolids Tipping Area: Evane/Zyme + Evane Scent are an air contact product. The Biosolids tipping area, located at the southern end of the building, is an open sided structure– 100,000 cu ft (60'x 50'x 35').

The purpose of the treatment is to control odor to unnoticeable levels on the critical downwind side of the building. One HDLA300 systems will be installed. Vapor will form a curtain barrier on one side of the

biosolids tipping area and will now extend from the building wall to the end of the loading hopper. Treatment is concentrated in the area that is expected to generate odor. The systems will operate 24 hours per day, seven days per week or as determined by the site manager.

Nozzles are not needed with GOC Vapor. The system requires a 460/3/60 7.9 amp power supply. Vapor is distributed around the area using 3" HDPE piping and Camclock hose. Holes are drilled in the piping (3/16 inch diameter) to release the vapor where it is needed.

g. Project Deliverables:

- 1 x HDLA100 and 1 x HDLA300 Vapor System control units – A free standing unit secured in a metal box. (4 month lease)
- 48 gallons of Evane/Zyme and 48 gallons of Evane Scent
- 400ft of HDPE piping and Camclock hose plus fittings as needed.

I am confident that the requested scope modifications will greatly enhance the overall project and showcases the latest odor control technologies that are available on the market today. If you have any questions or concerns relative to the modification I am requesting, please don't hesitate to contact me at 757-622-0692 (phone) 757-640-0239 (FAX), 757-647-6052 (Mobile) or email me at rkbe@cox.net. Thank you.

Attached information:

GOC Technologies Evane/Zyme Mode of Operation
HDLA Diffused Air Unit

CC: Joan Bradshaw
Miriam Zimms
Chuck Jett



RECEIVED
FEB 17 2005

RKBEnterprises, Inc.

625 Maury Ave, Norfolk VA 23517
757-622-0692 rkbe@cox.net

FILE

Saturday, February 12, 2005

Miriam Zimms
Kessler Consultants, Inc.
14620 N. Nebraska Ave., Bldg. D
Tampa, FL 33613

RE: Force - GOC Vapor odor Control

Dear Miriam:

As requested in an e-mail from Jose Rivera please find attached two updated schematics of the odor control systems as they are currently installed at Sumter.

Following consultation with Chuck Jett, the original layout was re-designed to include odor treatment of areas of concern to the staff. The original plan strung a line around the biosolids tipping area; no other area or equipment was included. This did not protect the hopper or the belt conveyor feeding the mixer, both know odor generator.

With the additional power provided by the vapor generating unit, HLDA300, the hopper-conveyor and the tipping area were both able to be covered.

Only one truck access door was selected for treatment in the transfer station. The direction of the wind as related to downwind local residents was considered in the selection of the door.

Please contact me with questions.

Sincerely,

Bob Broom
RKB Enterprises, Inc.
GOC Technologies
757-622-0692
rkbe@cox.net, or mobile (757) 647-6052.

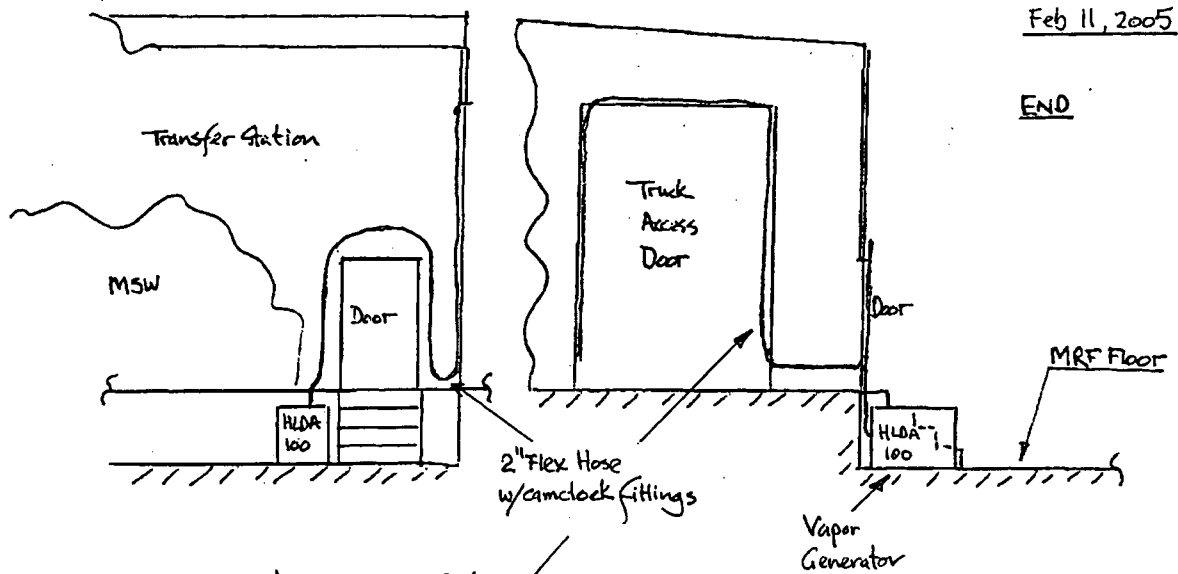
Encl: Schematic (2)

CC: Chuck Jett

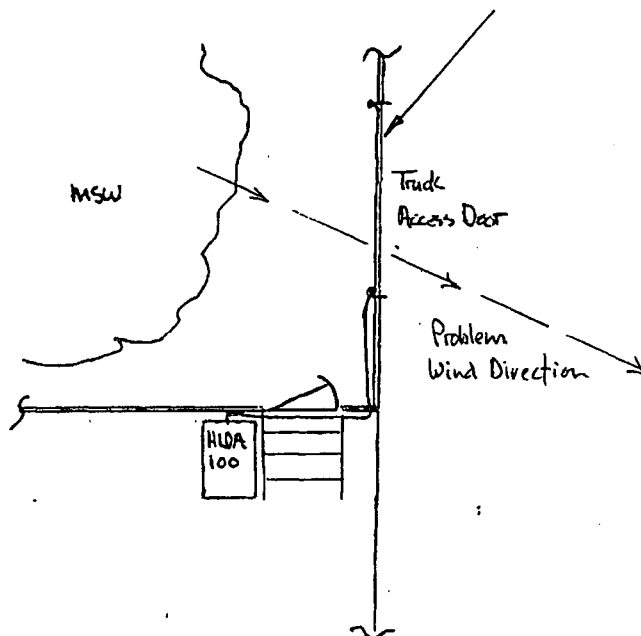
Feb 11, 2005.

END

SIDE



PLAN



Feb 9, 2005.

PLAN

Biosolids loading
↓

Biosolids tipping and storage area

Problem Wind Direction.

Problem Wind Direction

MSW Loading
←

Hopper

3/16" Holes
x 2 ft intervals

Tube

Tube

HDLA 300

Vapor Generator

SUMMER BIOSOLIDS AREA.

FRONT ELEVATION

Conveyor Cover

3-way Coupling

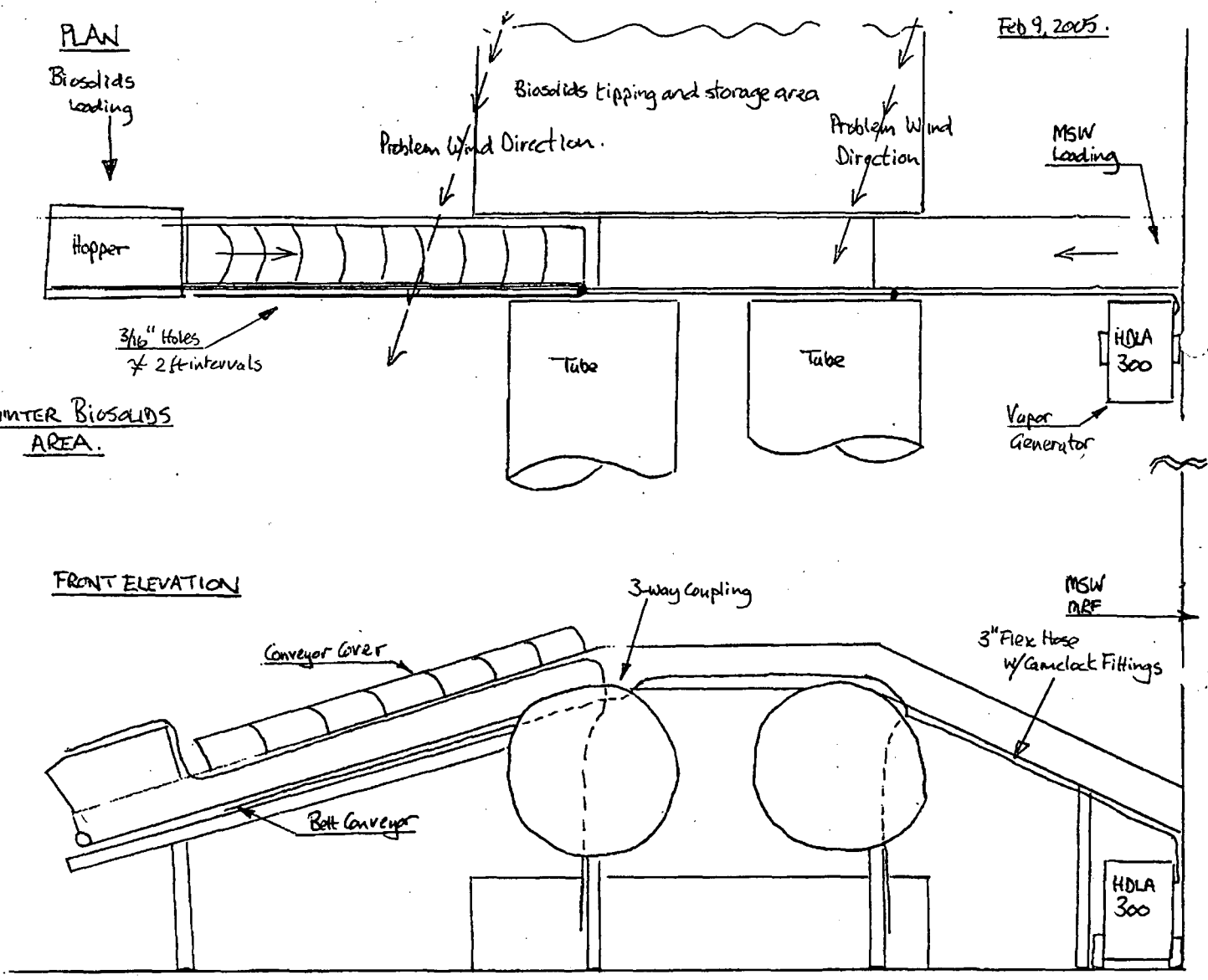
MSW MRF

3" Flex Hose w/ Camlock Fittings

Belt Conveyor

HDLA 300

Over Elevation



PROPOSAL FOR
GOC -Vapor, Odor Control
At
FORCE
Sumter County, FL
From
RKB Enterprises, Inc. and GOC Technologies
August 29, 2003

Summary Overview: If a larger portion of Florida's organic waste is to be recycled it must be possible to consistently handle material without causing an odor nuisance. Any implemented odor treatment process must be reliable, efficient and cost effective.

The following proposal is to demonstrate and evaluate the performance of a new odor product and process called GOC Vapor, which has distinct advantages for the composting and waste collection industries. Traditionally, air contact treatments involve a matrix of tubing feeding pressurized liquid to atomizing nozzles. Trouble-free operation of a nozzle system is problematic in the often dirty, dusty, moist conditions of composting tipping floors and MSW transfer stations. The GOC Vapor process eliminates reliability problems and increases the efficiency of treatment over a broad spectrum of odors.

Section I - Introduction

- a. Project Name: Odor Control for Biosolids Tipping Floors and MSW Transfer Stations
- b. Project Description:

Two areas at Sumnter with known intermittent odor problems will be treated, the MSW tipping floor and biosolids tipping area. The size and layout of the building/structure in each treated area and the nature of the tipped material will require a different approach and treatment product for each:

MSW Tipping Building: Treatment for odor with **GOC-Vapor 911UV**, an air contact product. The MSW Tipping Building is located at the northern end of the building. Although the four truck access doors are mostly left open, by design it is an enclosed space of 250,000 cu ft (120'x 60'x 35').

The purpose of the treatment is to diminish odor to unnoticeable levels in any location around the building and minimize odor inside the building.

Under normal conditions at this site, intermittent activation of two GOC-Vapor systems is required. Each unit will run 2 minutes every 10 minutes, and will reduce to 2 minutes every 60 minutes at night, and holidays. A greater volume of vapor will be concentrated in the areas adjacent to the truck doors.

The system requires a 115V power supply. Treatment is controlled by a timer that can be adjusted to meet the needs of the prevailing situation in the building. Nozzles are not required with GOC Vapor. Vapor is distributed using 3" PVC piping. 3/8 inch diameter holes are drilled in the piping to release vapor where needed. More holes, and therefore, more Vapor will be delivered to more odorous locations. The distribution of vapor within the building is balance by drilling more holes in the PVC pipe to increase dosage, or taping over existing holes if too much vapor is concentrated.

Biosolids Tipping Area: GOC-Vapor 910UV is an air contact product. The Biosolids tipping area is located at the southern end of the building. It is an open sided structure-- 100,000 cu ft (60'x 50'x 35').

The purpose of the treatment is to diminish odor to unnoticeable levels in any location around the building and minimize odor under the covered area. Two GOC-Vapor systems will be installed. Each system will feed vapor, as a curtain barrier, one to each side of the biosolids tipping area thus concentrating treatment in the area that is expected to generate odor. The systems will be controlled by a wind-vane primarily configured to protect the eastern neighborhood from odor.

The system requires a 115V power supply. Nozzles are not needed with GOC Vapor. Vapor is distributed around the area using 3" PVC piping. Holes, 3/8 inch diameter are drilled in the piping to release the vapor where it is needed. The wall curtain will be achieved by running PVC piping along the walls that retains the biosolids.

GOC-Vapor products, including 910UV and 911UV, are non-hazardous and can be handled without special requirements. All GOC products are safe for normal UPS shipment.

- c. Organization:
RKB Enterprises, Inc.
625 Maury Avenue, Norfolk, VA 23517
757-622-0692 office, 757-640-0239 fax, 757-647-6052 mobile, rkbe@cox.net
- d. Project Manager:
Bob Broom
- e. Project Duration:
Set up 2 days.
MSW Tipping Floor - 100 days
Biosolids Area - 100 days (estimated duration as controlled by the wind vane)
- f. ii. Part of travel costs, time on location, installation assistance, ongoing consultation.

g. Project Deliverables:

4 - GOC-Vapor System Control Units – A wall mounted box containing the electronics and plumbing to produce a vapor (gas) deodorizer. The timer can be programmed to an almost unlimited number of options for running the system. A fan runs continuously to assist the vapor down the pipe and to keep odorous gases out of the box electronics.

1- 55-gal drums of GOC 910 UV – broad spectrum deodorizer with a low pH bias to give preference to the sulfide odor families, such as H₂S.

1- 55-gal drums of GOC 911 UV - broad spectrum deodorizer with a subtle fresh smell odorizer. The pH is balanced to allow odors across the pH spectrum to be treated.

200 ft of 3" PVC piping with elbows, caps, supports, etc., as necessary to install the systems

1 - weather-vane control unit – Wind vane with electronics to make or break a circuit when the wind is in a designated sector.

Responsibilities of Sumter County for the Vapor System in both building:

- i. 115-volt electrical connection for each GOC-Vapor unit and weather-vane.
- ii. Provision of a locations for GOC-Vapor control systems. Priority should be given to a location that will allow movement and replacement of a 55-gallon drum.
- iii. Qualified person to assist install electrical equipment as advised by Bob Broom.
- iv. Equipment to unload and move 55-gal drums of product.
- v. Lift equipment as required.

h. Resume & Qualification:

RKB Enterprises was incorporated in 1995 to promote backyard composting through sales events for municipalities. In 1998, working with the Regional Authority and Hartman Engineering, RKB arranged the largest single day backyard-composting event ever in the US. In Greater New Orleans, nearly 19,000 Earth Machines were sold in one day. Bob Broom has installed in-vessel composting systems at a dairy farm, horse farm, abattoir, and food waste composting at an Iowa University, UNC Greensboro and a year long project funded by NC at Brown Creek Correctional Institute. RKB is also the US representative for TEG Environmental, the UK manufacturer of the "Silo-Cage Within Vessel System" which is primarily targeted at composting bio-solids. RKB has an extensive network in the recycling and composting industries established through regular attendance of conferences over the past ten years. Conference presentations include; Waste Expo, Composting the SE, Poultry Conferences in VA, and WEF VA. RKB Enterprises has represented GOC Technologies for 3 years primarily providing odor control solutions for composting operations. GOC Vapor is an emerging technology solution; RKB has installed the first system at a composting operation, near Raleigh, NC.

SECTION II - Environmental Benefits

i. Benefits:

GOC Vapor is a simple, dry, effective way to control ambient hydrogen sulfide (H₂S), ammonia and other odors using its vapor treatment products and the GOC-Vapor Controller. This system provides continuous chemical decomposition of odorous gases without liquid spray, misting nozzles, dangerous chemicals, ozone, or special handling and training. The benefits are:

- **Efficient odor control across a broad spectrum of odors**
- **Lower capital cost. An affordable effective system for composting**
- **Lower monthly product and maintenance costs**
- **Simple installation, no water supply required; equipment requires 115V electrical supply only**
- **All products are safe, no special handling or storage required. OSHA approved**
- **The system can replace conventional scrubbers or carbon filters**
- **Location. It eliminates the need to remotely site facility thus avoiding transportation costs and the environmental effects of longer trucking distances.**
- **Greatly reduces or eliminates the need for an aggressive Public Relation's program to overcome the odor complaints from neighbors.**

j. Testing:

Scientifically based odor testing is expensive. The collection and analysis of sufficient data cannot be conducted within the expected project funding limit.

The test will, therefore, be subjective. The treatment will operate for approximately 100 days. Currently, the Sumter County SW Composting Facility manages odor without treatment. They are careful to restrict daily operations that will cause any odor nuisance to downwind neighbors. They are not always successful.

Chuck Jett, Sumter Manager, will evaluate the treatments effectiveness. Bob Broom will produce report results. After successful treatment the Sumter facility will become a practical example of odor control.

SECTION III – Statewide Integration

- k. **Project Overview:** The following proposal is to treat the broad spectrum of odorous gases that originate from MSW and biosolids with GOC Vapor.

i. Introduction: Traditional air-contact odor control systems are expensive to install and operate. A matrix of nozzles supplied by pressurized tubing must be installed. Nozzles are often located in difficult to reach locations. Trouble-free

operation of nozzle systems is problematic in the often dirty, dusty conditions of tipping floors, and transfer stations.

The GOC Vapor demonstration period and ongoing treatment will show that odor from garbage tipping floors and sludge or biosolids tipping and storage areas can be efficiently minimized. Controlling these odors will reduce the nuisance factor in the neighborhood, and, increase the types of feedstocks that a compost facility can receive.

ii. Feedstocks: Feedstocks consist of MSW and biosolids currently processed at the co-composting facility.

Also, if appropriate, feedstocks of particular interest to the Technical Advisory Group can be treated and feedstocks utilized by other projects.

iii. Technology: Using hydrogen sulfide as an example: The control unit generates VAPOR containing amino hydroxyl groups. These groups react with odorous gases, such as, H₂S. Multistage reactions decompose H₂S into sulfate ions and amino groups. These harmless odorless compounds then are carried out of the treated area by the ventilation system, an installed exhaust fan, or the prevailing wind.

iv. Products: The contents of GOC 910UV and 911UV are proprietary. Additional information can be supplied on request. A MSDS is also available. GOC 910UV and 911UV liquids produce dry, smoke-like vapor providing maximum air mixing and contact time. Vaporization deodorizers are available as fragrance free reactants, fragranced reactants, or fragranced neutralizers. For example, 910UV would normally be fragrance free, but a pine or lemon/lime smell can be added if re-odorizing an area is considered beneficial.

v. Research: Non-scientific subjective testing only. Independent data collected or research by any organization to quantify the effectiveness of this treatment is welcome. Chuck Jett, Manager Sumter County Composting Facility, will keep a manual log of odorous feedstocks and comment on the effectiveness of the treatment. If complaints arise from neighbors they will be noted. A written report describing the treatment, dosage rates, running time, operational costs, feedstock variations and any odor events during the 100-day trial period will be provided within 60 days.

vi. Demonstration: The demonstration will be on a continuous basis for 100 days. The treatment will combat odors originating in the MSW Tipping Building and the biosolids area. Other odors that originate from the Force 40 demonstration area will not be the responsibility of this Vapor odor treatment. We will be available to assist if odor problems arise with other projects.

vii./viii Target audience from Attachment C, and Transferability is as follows:

Agriculture: hog houses, processing facilities, presses and DAF sludge storage tanks and handling buildings, rendering facilities

Biosolids: Lift stations, press rooms, fan exhausts as scrubbers. Treatment use for both odor control and reduce damage to concrete, metal fittings, and electronics.

Transportation: e.g. Vapor is not limited to treatment of ambient odor in a building. It can also be used to deodorize truck and loader cabs. Vapor will also deodorize cigarette odor from, for example, loaner vehicles and rental cars. For the entertainment industry, Vapor can quickly return buses and cruise ships to service.

Municipal and private sector compost: Tipping floors, storage tanks, processing buildings,

Poultry: Processing buildings, press rooms, storage tanks, and rendering facilities

Private sector processing: Processing buildings, press rooms, storage tanks, and rendering facilities.

Thoroughbred Industry: Stables, arenas

There is a financial impact on all of the above from the effects of odorous gases on employees and neighbors. Ammonia and H₂S damage metal structures, fittings, and electronics. Existing conventional odor control options are expensive to install and require intensive maintenance to keep operating efficiently. The effectiveness of the GOC-Vapor System, coupled with the relative low cost and simple operation make it a superior alternative to conventional air scrubber, spray misting systems or filters to control odor.

ix. Educational outreach: Consultation and evaluation of options will be provided to any organization. Each odor management problem invariably contains some unique aspects. GOC Vapor is not a panacea, but its advantages often mean Vapor odor treatment can replace restrictive procedures employed to remediate the effects of odor.

1. Proposal Schedule/ Time line:

Please see Attachment D for task description and budget requirements.

Attached Information:

1. Test Applications: Although we are focused on controlling H₂S as the most probable odorous gas, other odorous gases may be present at the building. This sheet shows the effectiveness of 901V and three other Vapor products to control odor.
2. Tru-Vapor – use of 901V to control H₂S and CO at a WWT plant press room.

MATERIAL SAFETY DATA SHEET

Company Global Odor Control Technologies, Inc.
Address 4901 N. Mt. Gilead Road
Bloomington, IN 47408
Telephone 888 227 8289
812 336 3435
Fax 812 336 3450

IDENTIFICATION SECTION

Product Name GOC 910 UV
Use Deodorizer

DIRECTIONS

Thoroughly mix entire container before use.
For use with ultrasonic vaporization equipment only.

TYPICAL PHYSICAL AND CHEMICAL PROPERTIES

Appearance	Clear to Orange solution
Odor	Sweet citrus fragrance
Toxicity	Low mammalian toxicity
pH	7.0± 0.5
Foam	Medium
Biodegradable	Yes
Flash Point	181°F 82°C
Solubility in Water	Fully soluble in water
Hazchem	Not applicable

Continued 2

MATERIAL SAFETY DATA SHEET - GOC 910 UV

INGREDIENTS

Essential oil blend (Proprietary), Biodegradable emulsifier, amino sucroate, food grade anti-foam agent, chelator, glycerol.

HEALTH HAZARD INFORMATION

HEALTH EFFECTS:

Skin	Mild irritant to skin.
Eyes	May cause irritant.
Inhaled	No fumes released.
Swallowed	Irritant to throat. May cause diarrhea.

FIRST AID:

Skin	Rinse with clean water.
Eyes	Rinse with water for 15 minutes. Seek medical advice if irritation persists.
Swallowed	Drink 500 mls of water.
Advice to Doctor	Treat symptomatically.

PRECAUTIONS FOR USE

Exposure Limits	No known effects.
Ventilation	Not applicable.
Personal Protection	Not applicable.
Flammability	Not applicable.

SAFE HANDLING INFORMATION

Storage & Transport	No special requirements.
Spills & Disposal	Flush with water to waste use absorbent in accordance with local regulations.
Fire/Explosion Hazards	Not applicable.

CONTACT POINT Phone 812 336 3435

The information contained in this Material Safety Data Sheet is provided in good faith and is believed to be correct as at the date hereof. However, it is expected that individuals receiving the information will exercise their independent judgment in determining its appropriateness for a particular purpose. Global Odor Control Technologies, Inc., makes no representation as to the accuracy or comprehensiveness of the information. Conditions of use and suitability of the product for particular uses are beyond our control; all risks of the use of the product are therefore assumed by the user and we expressly disclaim all warranties of any kind and nature, including warranties of merchantability and fitness for a particular purpose in respect to the use or suitability of the product. Appropriate warnings and safe handling procedures should be provided to handlers and users.

February, 2003

MATERIAL SAFETY DATA SHEET

Company Global Odor Control Technologies, Inc.
Address 4901 N. Mt. Gilead Road
Bloomington, IN 47408
Telephone 888 227 8289
812 336 3435
Fax 812 336 3450

IDENTIFICATION SECTION

Product Name GOC 911 UV
Use Deodorizer

DIRECTIONS

Thoroughly mix entire container before use.
For use with ultrasonic vaporization equipment only.

TYPICAL PHYSICAL AND CHEMICAL PROPERTIES

Appearance	Clear solution
Odor	Apple, melon fragrance
Toxicity	Low mammalian toxicity
pH	7.0± 0.5
Foam	Medium
Biodegradable	Yes
Flash Point	181°F 82°C
Solubility in Water	Fully soluble in water
Hazchem	Not applicable

Continued 2

MATERIAL SAFETY DATA SHEET - GOC 911 UV

INGREDIENTS

Essential oil blend (Proprietary), Biodegradable emulsifier, amino sucroate, additional proteins, food grade anti-foam agent, chelator, glycerol.

HEALTH HAZARD INFORMATION

HEALTH EFFECTS:

Skin	Mild irritant to skin.
Eyes	May cause irritant.
Inhaled	No fumes released.
Swallowed	Irritant to throat. May cause diarrhea.

FIRST AID:

Skin	Rinse with clean water.
Eyes	Rinse with water for 15 minutes. Seek medical advice if irritation persists.
Swallowed	Drink 500 mls of water.
Advice to Doctor	Treat symptomatically.

PRECAUTIONS FOR USE

Exposure Limits	No known effects.
Ventilation	Not applicable.
Personal Protection	Not applicable.
Flammability	Not applicable.

SAFE HANDLING INFORMATION

Storage & Transport	No special requirements.
Spills & Disposal	Flush with water to waste use absorbent in accordance with local regulations.
Fire/Explosion Hazards	Not applicable.

CONTACT POINT Phone 812 336 3435

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February 18, 2003

Memorandum

Florida Department of Environmental Protection

PERMIT COVER MEMO

TO: x Deborah A. Getzoff, District Director

FROM/THROUGH:

William Kutash

Susan Pelz, P.E.

Steve Morgan

ENVIRONMENTAL ADMINISTRATOR

SOLID WASTE MANAGER

SOLID WASTE PERMITTING

DATE: March 29, 2006

FILE NAME: Sumter County Material Recovery Facility MODIFICATION #: 126941-004-SO/MM
PERMIT #: 126941-003-SO
PROGRAM : Solid Waste COUNTY : Sumter

TYPE OF PERMIT ACTION: Notice of Permit Denial

PERMIT SUMMARY: The existing Sumter County Materials Recovery and Solid Waste Composting Facility is permitted to accept municipal Class I waste, remove unacceptable waste and recyclable materials through the material recovery facility and compost municipal solid waste at the composting facility.

PROFESSIONAL RECOMMENDATION: APPROVE X DENY

EVALUATION SUMMARY: An application for permit modification to modify the permitted odor control system at the existing Sumter County Materials Recovery and Solid Waste Composting Facility, was submitted on April 19, 2005. A Request for Additional Information ("RAI") letter was sent to the applicant on May 19, 2005. The Department received a certification of construction completion form for a new odor control system on January 20, 2006, however no responses to the Department's May 19, 2006 RAI were provided. The applicant has not provided sufficient information to demonstrate that the modification is in compliance with Department Rules.

Application received - April 19, 2005

Application complete - January 20, 2006

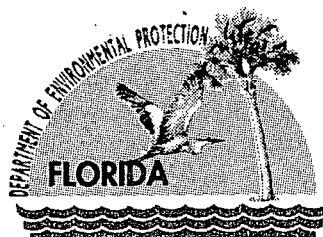
Department processing time- 99 days (to 3-29-06)

Initial review - 30 days (4/19/05 - 5/19/05)

Notice of Permit Denial for routing - 69 days (1/20/06 - 3/29/06)

Total processing time - 345 days (to 3-29-06)

DAY 90/30 FOR THIS ACTION IS: Day 90 = 04-19-06



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

CERTIFIED MAIL 7004 0750 0003 0516 2017

April 3, 2006

RETURN RECEIPT REQUESTED

In the matter of an

Application for Permit by:

DEP File No. 126941-004-SO/MM,
Sumter County

Bernard Dew, County Administrator
Sumter County Board of County Commissioners
200 N. Florida Avenue, Suite 3
Bushnell, Florida 33513-6146

NOTICE OF PERMIT DENIAL

The applicant, Sumter County Board of County Commissioners, applied on April 19, 2005, to the Department of Environmental Protection for a **modification** to the existing Solid Waste Processing Facility, referred to as the **Sumter County Material Recovery Facility**, located 1 mile east of Interstate 75, along the south side of C.R. 470, north of Bushnell, Sumter County, Florida.

The Department has permitting jurisdiction under Sections 403.707 and 403.861, Florida Statutes (F.S.), and Chapters 62-4 and 62-701, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a minor modification to a solid waste processing facility permit is required for the proposed work.

Pursuant to Rule 62-4.070(2), F.A.C., if, after review of the application and all the information, the Department determines that the applicant has not provided reasonable assurance that the construction, expansion, or operation of the installation will be in accord with

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applicable laws or rules, including rules of approved local programs, the Department shall deny the permit. The applicant has not provided reasonable assurance of demonstrating compliance with the requirements of Chapter 62-701, F.A.C., to the Department. The application does not comply with the following rule requirements:

1. Rule 62-701.320(1), F.A.C. A review of the permit modification request indicated that the original odor control system was subsequently replaced by an unpermitted alternate odor control system. Documentation (i.e. certification of construction completion documents) that demonstrates that the originally permitted odor control system was installed was not provided. Supporting information, documentation, engineering calculations, and full size "construction-level" drawings of sufficient detail to show how the alternate Hinsilblon odor control system is designed, constructed and operated was not provided.

2. Rule 62-701.320(5)(b), F.A.C., requires that information in every application shall be of sufficient detail to show how the facility will be constructed, operated, and closed and how it will be monitored and maintained after closure, in order to comply with the provisions of Chapter 62-701, F.A.C.

a. Memorandum titled "Change request for FORCE Proposal from RKB Enterprises Inc. and GOC Technologies submitted August 29, 2003," dated March 18, 2005: This memorandum makes several statements and claims regarding the proposed odor control system without providing adequate supporting information, documentation, and/or engineering calculations that demonstrate that the system will perform as indicated. The following comments regarding this memorandum were not addressed and a revised proposal with the following information was not provided.

1) The title of this memorandum and the section titled "Modification of the Original Agreement" appears to request a change to the existing FORCE proposal, however the cover letter for the modification indicates that "the test period ended" and "FORCE is currently in the process of submitting a final report..." An explanation of these discrepancies was not provided.

2) Background: Supporting information and/or documentation that the proposed system is "A proven and reliable atomizing system..." for odor control as proposed at this facility and that "GOC Technologies 500 series products... are the non-vapor versions of the GOC's 900 series products," as is stated in this section of the memorandum was not provided.

UNITED STATES POSTAL SERVICE

Dept. of Environmental
Protection

First-Class Mail
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Permit No. G-10

- Print your name, address, and ZIP Code in this box •

APR 06 2006

State of Florida
Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Steve Morgan

Solid Waste

R075

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City, State, ZIP+4

Mr. Bernard Dew, County Adm.
Sumter County BCC
209 North Florida Street, Ste 3
Bushnell, FL 33513-6146

PS Form 3800, June 2002

See Reverse for Instructions

7004 0750 0003 0516 2017

3) New System Capabilities & Modification of the Original Agreement: Supporting information, documentation and engineering calculations that demonstrate the capability of the system to deliver treatment product in accordance with the specific design (e.g. number of nozzles; length, diameter, path of hose; capacity of unit; application rate; etc.), proposed at this facility was not provided.

4) New System Capabilities: Detailed vendor information, drawings, and specifications for the proposed odor control system was not provided.

5) New System Capabilities: A specific description of the proposed procedures for limiting the use of the system by the utilizing the "wind sensor," including the proposed criteria for determining "wind... blowing from a critical sector" and "spray times" was not provided.

6) New System Capabilities: The cover letter for this modification states, "Currently, the Odor Control System, as approved in the Permit Renewals... issued on April 30th, 2004, is still operating..." This section references the "currently installed Hinsilblon product and equipment." Since this does not appear to be the odor control system permitted by the Department, an explanation of this was not provided.

7) How will the change effect the trial: The "Evane-Zyme" does not appear to be the "originally proposed GOC 910UV" that was "approved in the Permit Renewals... issued on April 30th, 2004." An explanation of the reference to the "existing treatment product, Evane-Zyme" was not provided.

8) How will the change effect the trial: Supporting information, documentation and/or engineering calculations utilized to support the statements, "The existing treatment product, Evane-Zyme, has not been consistently effective in the field," "BAT 502... has the same active ingredients and performance as... GOC 910UV," and "the new performance is expected to be greatly improved over Evane-Zyme" was not provided.

2. **Rules 62-701.320(5)(b), F.A.C.** Attached Drawings (2 sheets), dated February 9, 2005: Construction drawings for the proposed odor control system that are full size "construction-level" drawings of sufficient detail to show how the odor control system is designed, installed and operated were not provided.

3. **Rule 62-701.320(5)(b), F.A.C.** BAT 502 Test Applications: Supporting information, documentation and engineering calculations that demonstrate that the proposed odor control system will provide the application rate and contact residence time for the BAT 502 solution described by this specification document was not provided.

The Department will **deny** the permit unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative (proceeding) hearing in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Blvd., Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this denial. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit denial. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition and to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C. Mediation is not available in this proceeding.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of permit denial. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

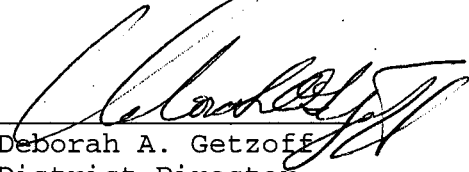
This action is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Chapters 62-110 and 28-106, F.A.C. Upon timely

filing a petition or a request for an extension of time, this permit denial will not be effective until further Order of the Department.

When the Order is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Blvd., Mail Station 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Deborah A. Getzoff
District Director
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this **NOTICE OF PERMIT DENIAL** and all copies were mailed before the close of business on **April 3, 2006** to the listed persons.

Date Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
Section 120.52(11), Florida
Statutes, with the designated
Department Clerk, receipt of which
is hereby acknowledged.

Anna Black
(Clerk)

04/03/2006
(Date)

DAG/sgm

Copies furnished to:

Sumter County Notification List

Joseph L. Miller, P.E., PBS&J, 482 S. Keller Rd., Orlando, FL 32804

Miriam Zimms, Kessler Consulting, Inc., 14620 N. Nebraska Ave., Tampa, FL 33613

Virginia Watson, Sumter County, 209 N. Florida Street, Bushnell, Florida 33513

Francine Joyal, FDEP Tallahassee

Patricia Comer, FDEP OGC

Susan Pelz, P.E., FDEP Tampa

Stephanie Watson, FDEP Tampa

SO
Susan

**Southwest District
Permitting Application**

New Site

Site Name:
Site ID:
County:
Type/Subcode:
Fee submitted: () correct () incorrect
Total Fee Required \$ _____ Need \$ _____ Refund \$ _____

Existing Site

Site ID: <div style="text-align: center;">126941-004</div>
Project Name: <div style="text-align: center;">SUMTER COUNTY MATERIALS PROCESSING FACILITY</div>
Type/Subcode: <div style="text-align: center;">SO/IM</div>
Fee submitted: \$100.00 <input checked="" type="checkbox"/> correct <small>SMALL COUNTY FEE</small> () incorrect
Total Fee Required \$ _____ Need \$ _____ Refund \$ _____

Applicant Information

Name: <div style="text-align: center;">BERNARD DEW</div>	
Role: <div style="text-align: center;">COUNTY ADMINISTRATOR</div>	
Company: <div style="text-align: center;">SUMTER COUNTY BOCC</div>	
Address: <div style="text-align: center;">209 W. FLORIDA AVENUE</div>	
City: <div style="text-align: center;">BUSHWELL</div>	Zip Code: <div style="text-align: center;">33573</div>
Phone: <div style="text-align: center;">(852) 793-0200</div>	

Fee verified by: S. MORGAN

Application Assigned To: S. MORGAN Date: 4/20/05



An employee-owned company

January 13, 2006

Mr. Jackie Jackson
Solid Waste Superintendent
Sumter County Solid Waste Management Facility
835 CR 529
Lake Panasoffkee, FL 33538



RE: Construction Certification for Odor Control System

Dear Mr. Jackson:

Enclosed are four originals of the Certification of Construction Completion of a Solid Waste Management Facility form for the odor control system.

Please review and if acceptable, forward two to FDEP.

If you have any questions, please call me at 407-647-7275 Ext. 4153.

Sincerely,

A handwritten signature in cursive script that reads "Joe Miller".

Joe Miller
Project Engineer

Cc: Miriam Zimms, Kessler Consulting Inc.
File 071475.03 Sumter County

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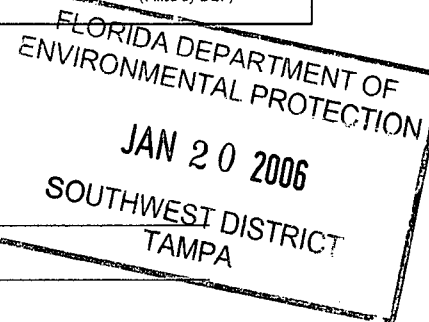


Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

DEP Form # 62-701.900(2)
Form Title Certification of Construction Completion
Effective Date May 19, 1994

DEP Application No. _____
(Filled by DEP)

Certification of Construction Completion of a Solid Waste Management Facility



DEP Construction Permit No: 126941-003SO&126940-010SO County: Sumter

Name of Project: Sumter County Solid Waste Management Facility

Name of Owner: Sumter County Board of County Commissioners

Name of Engineer: Joe Miller, PBS&J, 482 S. Keller Rd., Orlando, FL. 32810

Type of Project: Odor Control System for Biosolids Tipping Floor and MSW Transfer Station. Permits
No. 126940-010-SO Composting Facility Operation & No. 126941-003-SO Materials Recovery Facility.

Cost: Estimate \$ 30,000 Actual \$ 30,000

Site Design: Quantity: N/A ton/day Site Acreage: N/A Acres

Deviations from Plans and Application Approved by DEP: A Hinsilblon HLDA-100 vapor unit was
installed with 2" flex hose over the leeward truck access door to the Materials Recovery Facility.

A Hinsilblon-300 vapor unit was installed with 3" flex hose over the biosolids tipping floor, hopper and
belt conveyor feeding the mixer. The vapor generating units spray Evane/Scent during working hours
as needed to control odors.

Address and Telephone No. of Site: 835 CR 529, Lake Panasoffkee, FL 33538

Telephone #352-793-3368

Name(s) of Site Supervisor: Tommy Hurst or Jackie Jackson

Date Site inspection is requested: At the convenience of FDEP.

This is to certify that, with the exception of any deviation noted above, the construction of the project has been completed in substantial accordance with the plans authorized by Construction

Permit No. 126941-003-SO & 126940-010-SO : Dated: 04/30/2004 & 04/30/2004

Date: January 10, 2006

Joseph L. Miller
Signature of Professional Engineer

Page 1 of 1

P.F. # 39177



Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

DEP Form # 62-701.900(2)
Form Title Certification of Construction Completion
Effective Date May 19, 1994
DEP Application No.

DEP
JAN 20 2006
SOUTHWEST DISTRICT

Certification of Construction Completion of a Solid Waste Management Facility

DEP Construction Permit No: 126941-003SO&126940-010SO County: Sumter

Name of Project: Sumter County Solid Waste Management Facility

Name of Owner: Sumter County Board of County Commissioners

Name of Engineer: Joe Miller, PBS&J, 482 S. Keller Rd., Orlando, FL. 32810

Type of Project: Odor Control System for Biosolids Tipping Floor and MSW Transfer Station. Permits
No. 126940-010-SO Composting Facility Operation & No. 126941-003-SO Materials Recovery Facility.

Cost: Estimate \$ 30,000 Actual \$ 30,000

Site Design: Quantity: N/A ton/day Site Acreage: N/A Acres

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Address and Telephone No. of Site: 835 CR 529, Lake Panasoffkee, FL 33538
Telephone #352-793-3368

Name(s) of Site Supervisor: Tommy Hurst or Jackie Jackson

Date Site inspection is requested: At the convenience of FDEP.

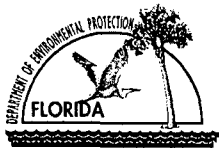
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Permit No. 126941-003-SO & 126940-010-SO :Dated: 04/30/2004 & 04/30/2004

Date: January 10, 2006

Joseph J. Miller
Signature of Professional Engineer
P.E. # 39177

Page 1 of 1



Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

DEP Form # 62-701.900(2)
Form Title Certification of Construction Completion
Effective Date May 19, 1994

DEP Application No. _____
(Filled by DEP)

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DEP Construction Permit No: 126941-003SO&126940-010SO County: Sumter

Name of Project: Sumter County Solid Waste Management Facility

Name of Owner: Sumter County Board of County Commissioners

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as needed to control odors.

Address and Telephone No. of Site: 835 CR 529, Lake Panasoffkee, FL 33538

Telephone #352-793-3368

Name(s) of Site Supervisor: Tommy Hurst or Jackie Jackson

Date Site inspection is requested: At the convenience of FDEP.

This is to certify that, with the exception of any deviation noted above, the construction of the project has been completed in substantial accordance with the plans authorized by Construction

Permit No. 126941-003-SO & 126940-010-SO :Dated: 04/30/2004 & 04/30/2004

Date: January 10, 2006

Joseph L. Miller
Signature of Professional Engineer

Page 1 of 1

P.E. #39177



Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

DEP Form # 62-701.900(2)
Form Title Certification of Construction Completion
Effective Date May 19, 1994

DEP Application No. _____
(Filled by DEP)

Certification of Construction Completion of a Solid Waste Management Facility

DEP Construction Permit No: 126941-003SO&126940-010SO County: Sumter

Name of Project: Sumter County Solid Waste Management Facility

Name of Owner: Sumter County Board of County Commissioners

Name of Engineer: Joe Miller, PBS&J, 482 S. Keller Rd., Orlando, FL 32810

Type of Project: Odor Control System for Biosolids Tipping Floor and MSW Transfer Station. Permits
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Date: January 10, 2006

Joseph L. Miller
Signature of Professional Engineer

Page 1 of 1

PE #39177

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

REGULATORY DISTRICT ROUTING SLIP

TO:

Steve Morgan

DATE: 5-17-05

CC:

	PENSACOLA	NORTHWEST DISTRICT	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
✓	TAMPA	SOUTHWEST DISTRICT OFFICE	
	Punta Gorda	Southwest District Branch Office	
	Bartow	Southwest District Branch Office	
	ORLANDO	CENTRAL DISTRICT OFFICE	
	JACKSONVILLE	NORTHEAST DISTRICT OFFICE	
	Gainesville	Northeast District Branch Office	
	FORT MYERS	SOUTH DISTRICT OFFICE	
	Marathon	South District Branch Office	
	WEST PALM BEACH	SOUTHEAST DISTRICT OFFICE	
	Port St. Lucie	Southeast District Branch Office	

Reply Optional by _____ Reply Required by _____ Info Only _____

COMMENTS:

FROM:

Francine

PHONE

205-8747

05-01-01

Note: This project is in the first stage of reaching a commercial size. These numbers are very preliminary and will become much more meaningful as the operation matures.

Robert Broom, GOC – Vapor and Odor Control at FORCE Sumter County, FL:

This project completed its pilot period on January 28, 2005; however a contract extension through September 30, 2005 was approved by the Board on January, 18, 2005. A copy of the contract extension is attached.

Sumter County entered a period of evaluating the installed system and deciding which odor control system to keep. The mechanisms of the installed system worked properly, but this system did not solve or eliminate odor completely. No odor complaints were received from off-site properties. However, some minor concerns have been expressed by staff in the biosolids area. A new system similar to the one Sumter County already installed is being proposed to replace the existing system. This minor permit modification is currently under review by the DEP Tampa office. Since this project also relates to a permit condition in the counties permit(s) a minor permit modification was requested of the DEP regional office to change systems. Upon approval by the local office the system will be changed.

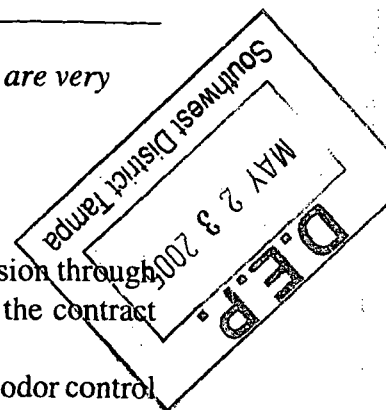
The County is currently reviewing extending this project and testing another odor control system for two reasons: 1) extend the odor duration evaluation over more seasons and 2) obtain comparative equipment operation and economic data for analysis. Regardless, a final report regarding the original odor control system will be prepared and final reimbursements will be requested next quarter. When the DEP Tampa office approves the new system, it is possible that an additional addendum to this project will be made to fund the 2nd odor control system through FORCE; the County will notify the Tallahassee DEP office and request approval.

4.4. Conferences and Meetings: \$ 4,766.42

FORCE facility staff attended the *US Composting Council Conference* in San Antonio, Texas from Monday, January 24th until Wednesday, January 26th to obtain additional operational training in relation to the digester as well as utilizing various feedstocks for innovative research applications. A presentation about FORCE was given by Miriam Zimms (MZ), Kessler Consulting, Inc. (KCI) at the conference as well as MZ gathered equipment information from vendors to include in the technology database on the website and discussed the RFT/FORCE demonstration event. Reimbursement by County staff for this travel is being billed to this task. KCI is only billing for MZ hours attending the conference on behalf of FORCE; no travel will be charged by KCI.

4.5 Demonstration Farm Operations: \$ 13,984.00

See section: 4.3 – UF/Rockwood project update, which is occurring on the FORCE 40-acre farm.



**FORCE PROGRAM ADDENDUM**

between
SUMTER COUNTY PUBLIC WORKS
319 East Anderson Avenue
Bushnell, FL 33513
and

Entity: **RKB Enterprise, Inc.**

Attention: **Bob Broom**

Address: **625 Maury Ave**

Norfolk, VA 23517

PROJECT #: RFP-FI-_____

Project Title: GOC-Vapor Odor Control at FORCE

TYPE OF ADDENDUM:

- ☐ Renewal of Funds
- ☐ Continuation
- ☒ Contract Extension
- ☒ Proposal Activity
- ☐ Funding Use

CERTIFICATION/ASSURANCES:

- ☐ Propriety
- ☐ Good Lab Practices

LOCATION:

Sumter County/FORCE
Other _____

Phone: 757-622-0692

Fax: 757-640-0239

Email: rkbe@cox.net

This written agreement confirms a Sumter County Commission Board approval of A grant ADDENDUM. The work covered by this ADDENDUM is for the purpose of:

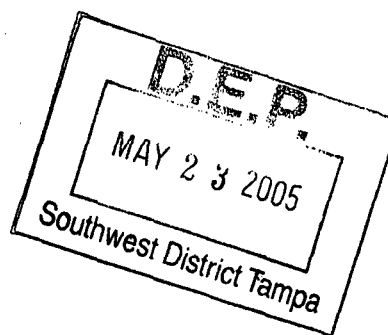
- X Extending the contract end date until: September 30, 2005
Justification:
Permitting constraints resulted in late project start up. The odor control system was installed in late October.
- X Amending the proposal activities as follows:
See Attached.
- ☐ Amending the use of the grant funds as follows:
- ☐ Attachment with additional information.

Jay A. Chandler Chairman 1-18-05
Sumter County Representative, Signature and Title, Date

Bob Broom RKB Enterprise, Inc. President Jan 10, 2005
Grantee Representative, Signature and Title, Date

TO: Bernard Dew, FORCE Director
Mitch Kessler, FORCE Director

FROM: Bob Broom,
RKB Enterprises, Inc,
625 Maury Ave.
Norfolk, VA 23517



RE: Change Request for FORCE Proposal from RKB Enterprises, Inc. and GOC technologies submitted August 29, 2003.

DATE: June 28, 3004

This memo is a request to modify and update the RKB Enterprises, Inc. and GOC Technologies FORCE grant proposal submitted August 29, 2003. Since the original proposal was submitted ten months ago, new technologies have emerged in the industry warranting modifications in the FORCE grant project. I have outlined justification for project modifications and the resulting benefits of these upgrades:

Upgrade #1: Odor control technology had been stagnant for years but in the year 2000 GOC Technologies introduced a unique approach to air contract treatment – Vapor Technology. In April 2004 GOC concluded more than a year of testing resulting in the adaptation of the GOC product "GOC 910UV" to perform in tandem with equipment manufactured by the Florida based odor control company, Hinsilblon. The new product is call Evane/Zyme + Evane Scent (EZ-ES). The delay in starting the demonstration has enabled the new combined GOC – Hinsilblon product and equipment to be available for use in the FORCE project.

How will the change effect the trial?

The principle concepts for FORCE the demonstration project will be unchanged. The scope and duration are unchanged. The new hardware is more appropriate for an industrial application and has been adapted from existing Hinsilblon equipment with proven long term reliability. The treatment product EZ-ES has the same active ingredients as GOC 910UV and therefore the performance is expected to be unchanged.

Benefit to Sumter County:

A. *Post trial costs:* The combined operating cost of the four GOC Vapor units was expected to range from \$2,000 to \$5,000 per month; intermittent operation controlled by a timer was used to keep costs down.

The new system will operate 24 hours per day, seven days per week, plus, provide expanded coverage around the biosolids tipping area beyond the scope of the original system.

After the trial, if an annual contract is acceptable to the county, the biosolids system will cost \$ 2,160 monthly and the unit in the transfer station doorway \$ 720 monthly.

B. Equipment lease or purchase: The purchase price of the new equipment – HLDA100 and HLDA300 exceeds the full grant amount of \$25,000. Special arrangements will therefore be made to lease the equipment. This provides options for the county and will allow for future equipment upgrades without new purchases. The lease also allows for the larger more robust systems to be used for the trial without increasing the total dollar amount of the grant.

Modifications of the Agreement:

Section I:

A: Modify language throughout "GOC Vapor 911UV and GOC Vapor 910UV" to read Evane/Zyme + Evane Scent

B. Modify language to read:

MSW Tipping Building: treatment with Evane/Zyme + Evane Scent, an air contact product. The MSW Tipping Building is located at the northern end of the building; although the four truck access doors are mostly left open it is by design an enclosed space – 250,000 cu ft (120'x 60'x 35').

The purpose of the treatment is to control odor to unnoticeable levels downwind of the building. Under normal conditions, a Hinsilblon HLDA100 system is needed, running continuously or as needed. Nozzles are not required with GOC Vapor. The system requires a 115/1/60 14.5 amp power supply. Vapor is distributed using 2" HDPE piping and Camclock hose. Holes are drilled in the piping (3/16 inch diameter) to release the vapor where it is needed. More holes, and therefore, more vapors will be delivered to likely odorous locations. It is simple to make adjustments to the distribution of vapor by either drilling more holes or sealing existing holes.

Biosolids Tipping Area: Evane/Zyme + Evane Scent are an air contact product. The Biosolids tipping area, located at the southern end of the building, is an open sided structure– 100,000 cu ft (60'x 50'x 35').

The purpose of the treatment is to control odor to unnoticeable levels on the critical downwind side of the building. One HDLA300 systems will be installed. Vapor will form a curtain barrier on one side of the

biosolids tipping area and will now extend from the building wall to the end of the loading hopper. Treatment is concentrated in the area that is expected to generate odor. The systems will operate 24 hours per day, seven days per week or as determined by the site manager.

Nozzles are not needed with GOC Vapor. The system requires a 460/3/60 7.9 amp power supply. Vapor is distributed around the area using 3" HDPE piping and Camclock hose. Holes are drilled in the piping (3/16 inch diameter) to release the vapor where it is needed.

g. Project Deliverables:

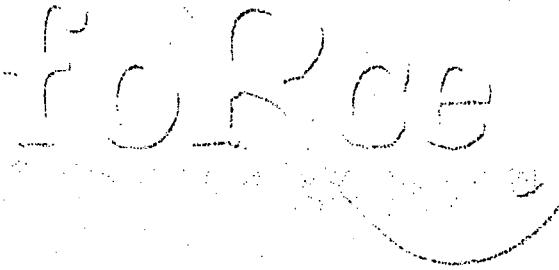
- 1 x HDLA100 and 1 x HDLA300 Vapor System control units – A free standing unit secured in a metal box. (4 month lease)
- 48 gallons of Evane/Zyme and 48 gallons of Evane Scent
- 400ft of HDPE piping and Camclock hose plus fittings as needed.

I am confident that the requested scope modifications will greatly enhance the overall project and showcases the latest odor control technologies that are available on the market today. If you have any questions or concerns relative to the modification I am requesting, please don't hesitate to contact me at 757-622-0692 (phone) 757-640-0239 (FAX), 757-647-6052 (Mobile) or email me at rkbe@cox.net. Thank you.

Attached information:

GOC Technologies Evane/Zyme Mode of Operation
HDLA Diffused Air Unit

CC: Joan Bradshaw
Miriam Zimms
Chuck Jett



825 CR 529 Lake Panasoffkee, FL 33538 • Phone: 800-566-4413 Fax: 352-793-4505 • www.floridaforce.org

Fax

To: Jose

From: Stacie

Attn:

Pages: 4 including cover

Fax: 813-971-8582

Date: 4/25/05

Phone:

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

• Comments:

FORCE PROGRAM SUMMARY

GOC-Vapor Odor Control at FORCE

Contact Information:

Bob Broom,
RKB Enterprises, Inc,
625 Maury Ave
Norfolk, VA 23517
Phone: 757-622-0692 Fax: 757-640-0239
Email: rkbe@cox.net

Summary of Project Monthly Activities

March 2004

Permitting issues- No activities this month

April, 2004

Permitting issues- No activities this month

May, 2003

Permitting issues- No activities this month

June, 2004

Principal Investigator Bob Brooms visited the Sumter County facility on Friday June 25th. He took measurements to begin the odor control project.

In April 2004 GOC concluded more than a year of testing resulting in the adaptation of the GOC product "GOC 910UV" to perform in tandem with equipment manufactured by the Florida based odor control company, Hinsilblon. The new product is call Evane/Zyme + Evane Scent (EZ-ES). The delay in starting the demonstration has enabled the new combined GOC - Hinsilblon product and equipment to be available for use in the FORCE project.

A letter requesting change in the original odor control proposal scope of work was submitted on June 28, 2004 by RKB Enterprises, Inc. and GOC technologies.

July, 2004

On July 20th Principal Investigator Bob Brooms was approved to proceed with the revised order control project as outline in a revised proposal submitted on June 28th 2004. As per this agreement Bob will donated the odor control distribution lines at the conclusion on the project.

.....

September, 2004

Florida experienced three more hurricanes disrupting many activities relative to FORCE grant projects. Bob has scheduled a site visit to Sumter County during the week of October 18th in an attempt to install the odor control system.

FORCE Quarterly Report

December 29, 2004

Project: GOC-Vapor Odor Control for Biosolids Tipping Floors and MSW Transfer Station.

Project Manager: Bob Broom

Period Covered: Oct, Nov, Dec, 2004

Actions:

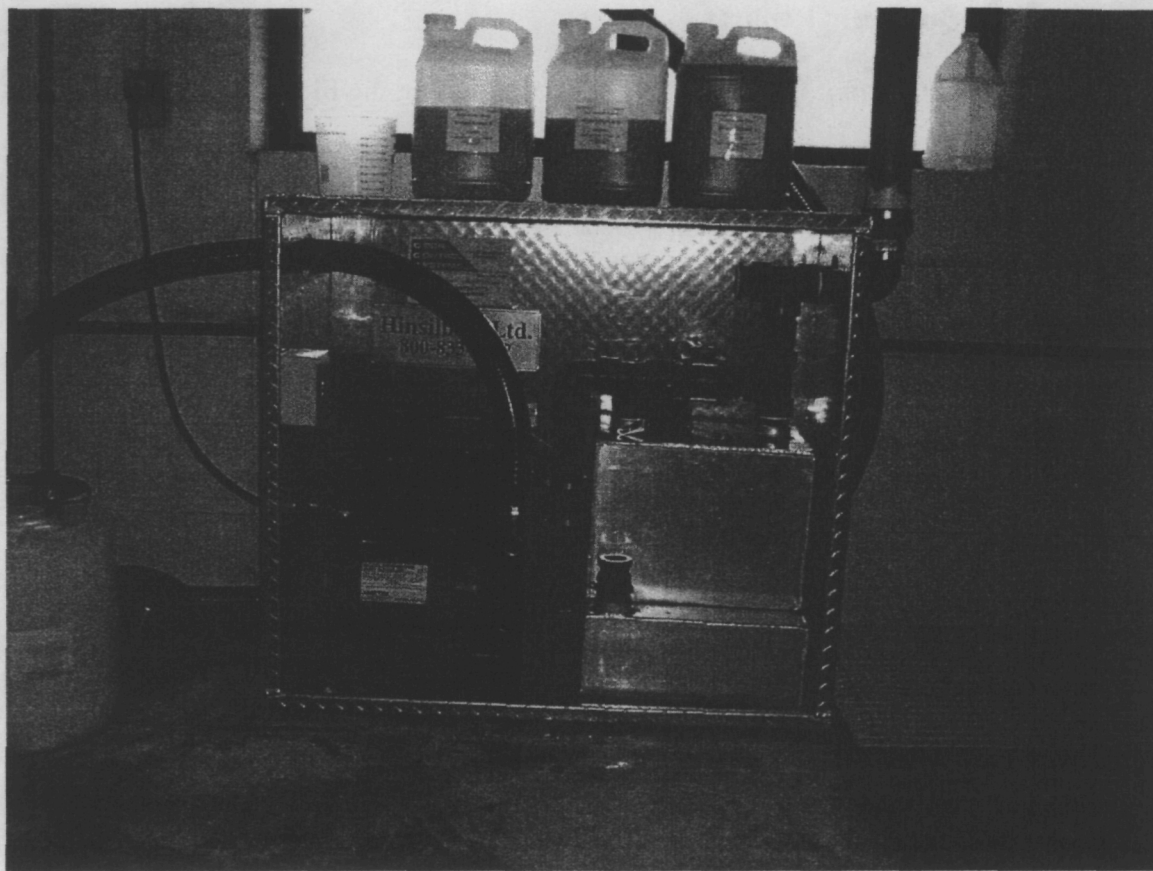
June 23-25

A facility visit with Joan Bradshaw and Chuck Jett to discuss the possibility of amending the project. The change would include new equipment, which had recently become available. Chuck Jett confirmed additional installation requirement would be available, notably, a 460V 3-phase power supply.

Since the original proposal was submitted ten months previously, new technologies had emerged in the industry warranting modifications in the FORCE grant project. I outlined justification for project modifications and the resulting benefits of these upgrades:

GOC's product "GOC 910UV" was adapted to perform in tandem with equipment manufactured by the Florida based odor control company, Hinsilblon. The two new products are Evane/Zyme and Evane Scent (EZ-ES). The delay in starting the demonstration has enabled the new combined GOC – Hinsilblon product and equipment to be available for use in the FORCE project.

The scope and duration of the project were unchanged. The new hardware is more appropriate for an industrial "outside" application and has been adapted from existing Hinsilblon equipment which has demonstrated long term reliability. Since installation, this decision has been proven judicious. In particular the transfer station is a brutal environment to operate any equipment; the transfer station system was found buried in garbage during the Dec 10 visit, but still running. The treatment products EZ-ES have the same active ingredients as GOC 910UV and therefore the performance is expected to be unchanged. Both products will be tested, also a combination of the two products.



Cabinet with HDLA 100 Vapor System

The primary benefit of the equipment change was assessed as both economic and system reliability. The monthly cost for treatment of the two site areas will be lower. Operating costs are being assessed but it is expected to be in the order, post trial, at less than \$3,000 per month to treat both areas.

In conjunction with the Sumter staff it was agreed to focus more on the full treatment of the biosolids tipping area. Treatment of the MSW Tipping Building will be limited to one door on the eastern side of the building; this door faces the closest domestic housing area and is also in the path of the prevailing wind.

A safe location for the equipment away from moving wheel loaders and trucks was identified. The location had good access to a 115/1/60 14.5 amp power supply.



Trailer with HDLA 300 Vapor System

The Biosolids tipping area is located at the southern end of the building, it is an open sided structure-- 100,000 cu ft (60'x 50'x 35'). The odor from the tipping area is very unpredictable; Sumter has minimal control over the content of the arriving loads. For this reason, again in consultation with the Sumter staff, it was decided to oversize the equipment to include a 3-Hp Vapor system. The system's capacity allows Vapor to form a curtain barrier on one side of the biosolids tipping area extending on multiple levels from the building wall to the end of the loading hopper. The 460/3/60 7.9 amp power supply was available in the location but a breaker box had to be provided by Sumter.

Oct 18

Travel by truck from Norfolk Virginia with tools and equipment needed for the installation.

Oct 19

Continue travel to the Sumter site

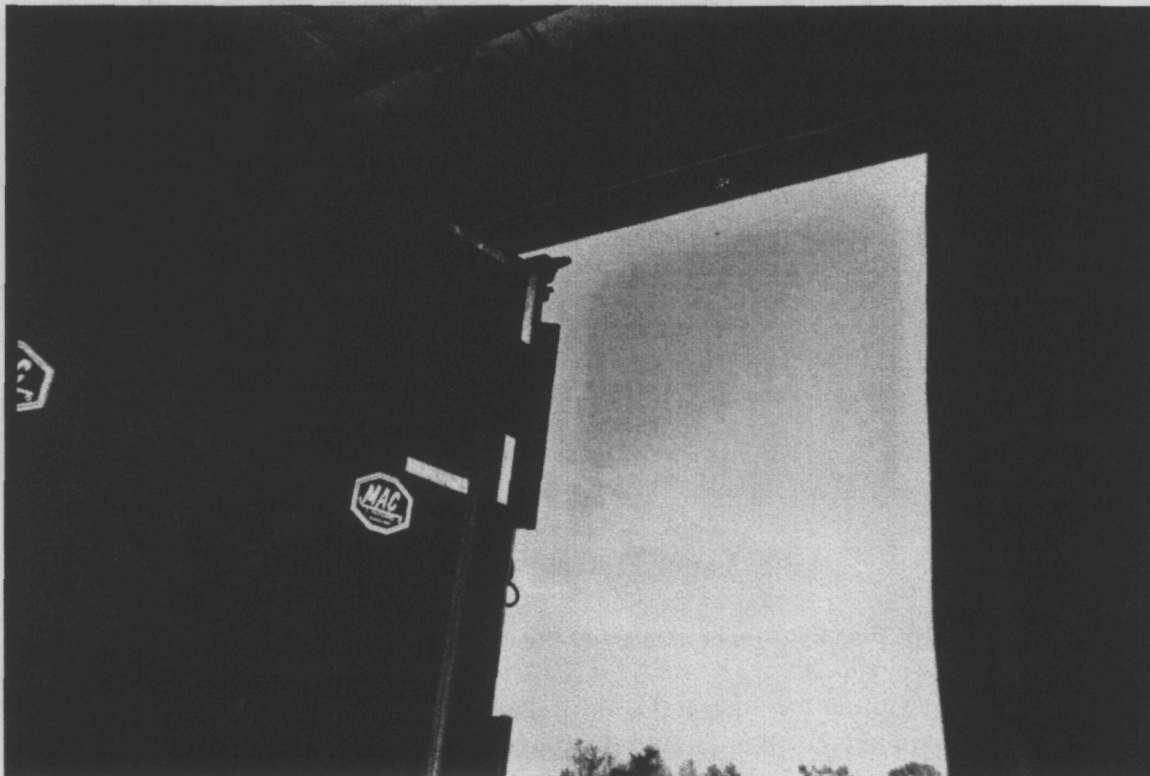
Oct 20

Project deliverables were collected from the Hinsilblon factory in Cape Coral and from a Hinsilblon subcontractor in Tampa; the equipment was loaded into two trucks and two trailers. The equipment included a 3-Hp system trailer, the 1-Hp unit in an aluminum cabinet, and 400ft of flex hose and fittings. The product, 1x 55-gal drum of

Evane Zyme and 1x 55-gal of Evane Scent were delivered to the site by common carrier.

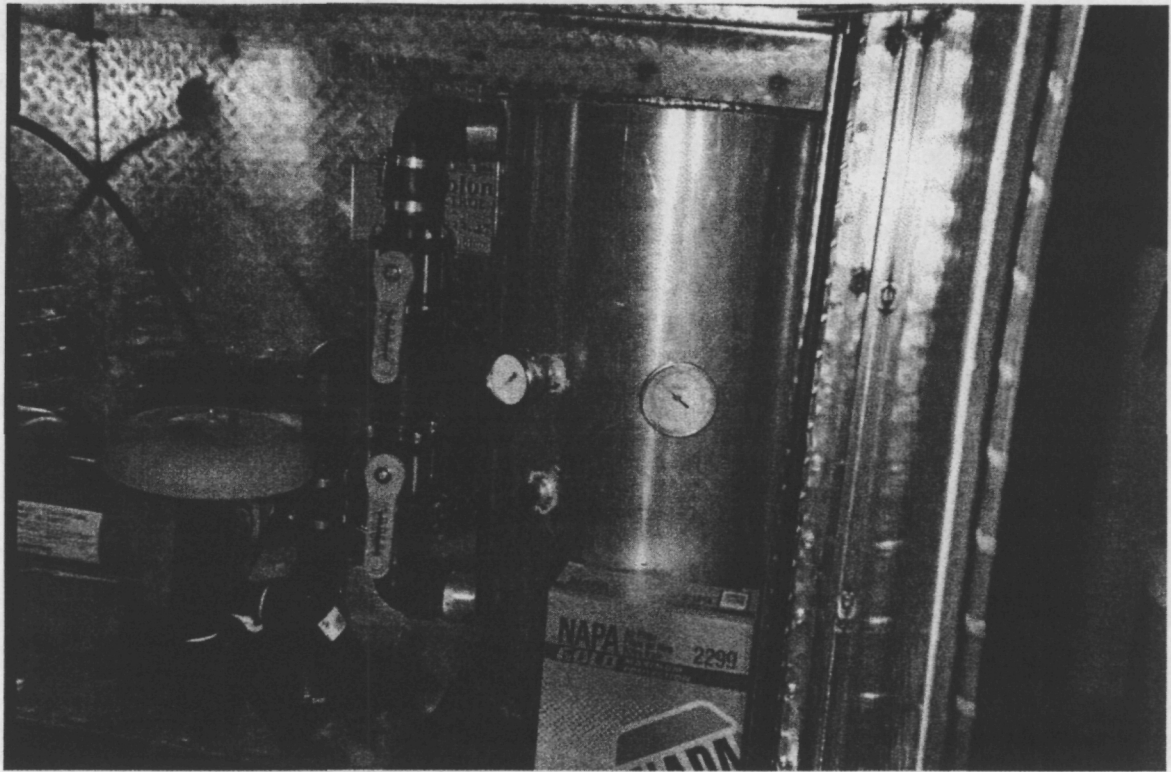
Oct 20 - 21

The location of the Hinsilblon HLDA100 system was changed to an area outside of the Sumter transfer station because access to the door between the transfer station and the MRF was impeded. The Sumter staff offered a new location in a protected corner. The new location required an extra 15 ft of 2" flex hose which, it is anticipated, will not affect system performance; the total length of hose, which completely covers the eastern truck access door, is 70ft.



Eastern doorway in the transfer station

Nozzles are not required with the GOC Vapor system. The HLDA100 system Vapor is distributed using 2" HDPE piping, flex hose, and Camclock fittings. A local electrician installed a 115V power supply box on the wall adjacent to the system; the system was hard wired to the power supply. A 2" flex hose run from the unit was routed over the top of the door, back into transfer station. A man-lift was used to install the hose around the 15ft high doorway. Holes were drilled in the piping (3/16 inch diameter) to release the vapor where it is needed. The systems is capable of operating 24 hours per day, seven days per week, but the site manager decided to run the system during working hours only. At the managers discretion the system will be run overnight or at weekends if an odorous load remains in the transfer station.



HDLA100 System during installation



HDLA300 System During Installation

In the biosolids tipping area Vapor is distributed around the area using 3" HDPE flex hose and Camclock fittings, powered by a HDLA300 Vapor System. It was decided that treatment should be concentrated in the areas that are expected to generate the most odor. At Sumter the biosolids are delivered by truck and dumped into a holding area. A wheel-loader then moves the biosolids to a hopper, and then a conveyor moves them to a mixer for loading into the tube. The hopper and the conveyor were considered the highest priority. The original design of the system placed the HDLA300 in the center of the conveyor area. The physical size of the trailer made this location impractical as movement of other equipment would be restricted. A new location next to the MRF wall did not interfere with other operations. It also had the advantage of being easier to provide the 460/3/60 7.9 amp power supply. From this location the 300 ft of 3" flex hose was coupled together to form the vapor wall. In addition, approximately 40ft of 2" hose was run down the conveyor support legs to bring some treatment down to ground level. Holes were drilled in the piping (3/16 inch diameter) to release the vapor where it is needed. More holes were drilled in the hose run along the top of the hopper and along the hose adjacent to the conveyor belt. It is simple to make adjustments to the distribution of vapor by either drilling more holes or sealing existing holes with tape

**3" Flex Hose run along the rim of the hopper two runs along the conveyor.
2" flex hose runs down from the top of the conveyor**





Checking on the operating pressure in the HDLA300 System

Oct 21

Both Systems were charged with Evane Scent and run to prove the operation. After drilling some additional holes the system pressure and amperage, for both systems, were within tolerance. The installation was therefore considered successful.

Record Keeping: There are insufficient funds to measure any change in specific odorous compounds, all record taking is therefore subjective. The site manager (FL Boy) and the facility manager agreed to keep records. After discussions with Joan Bradshaw and Chuck Jett, sheets were designed to record system consumption, hours of operation, and incidents. Copies of the record sheets are attached.

Oct 22

Return by truck to Norfolk, VA

Oct 25

Finalize record keeping documentation. Joan Bradshaw provided the finished forms to the site.

Nov 5

Post installation service of the system. The site had a problem with the voltage overload protection switch which had tripped on several occasions. Chuck Jett promised

to investigate the facility power supply; it was consider likely that facility power surges caused the problem.

Nov 9

In the biosolids area, the HDLA300 system pressure drifted to a higher level than specified. This puts unwanted pressure and therefore potential ware on the blower motor. To reduce the pressure some additional hoses were drilled. This was successful. Sumter had not identified any power surges following an investigation of the voltage overload problem. It was therefore decided to change the voltage overload protection switch on the HDLA300 system to one with a wider voltage tolerance. A new switch was ordered.

Nov 15

A new voltage overload protection switch was installed in the HDLA300.

Nov 16

Service call to check on the operation of the new overload switch. The system had run since yesterday without cutting out. The facility may still have voltage surges but the system is now able to run continuously; or, the old overload switch was defective. In either case the problem is solved.

Nov 22

Service call. Again the HDLA300 system was running at a slightly higher pressure than desired. Additional holes were again drilled and the pressure reduced.

Dec 01

Service call. System pressure and operations looked fine.

Dec 7-10

Visit from Norfolk to check system records and operation.

Dec 8

Change treatment product from Evane Scent to Evane Zyme. Refill both systems. All operations appear normal. Both systems are operated manually by the site managers at the start and end of each working day. There have been no odor complaints during the operation with Evane Scent.

Dec 9

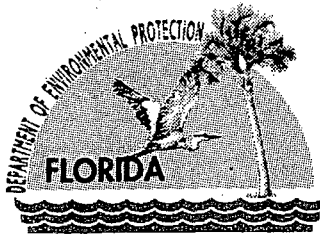
Attend the FORCE TAG meeting at Bushnell.

After the TAG meeting the Sumter system was shown to Chris Snow of Hillsborough County.

Dec 21-29

Prepare quarterly report.

757-622-0692 (phone) 757-640-0239 (FAX) 757-647-6052 (Mobile) rkbe@cox.net.



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

Bernard Dew, County Administrator
Sumter County Board of County Commissioners
200 N. Florida Avenue, Suite 3
Bushnell, Florida 33513-6146

May 19, 2005

**Re: Sumter County Solid Waste Composting & Recycling Facility, Sumter County
Odor Control System Modification
Pending Permit Modification No.: 126941-004-SO
Permit Nos.: 126941-003-SO - Material Processing Facility
126940-010-SF - Composting Facility**

Dear Mr. Dew:

This is to acknowledge receipt of the permit modification application prepared by PBS&J, dated April 15, 2005, (received April 19, 2005), for modification of the operation of a solid waste composting facility and a waste processing facility.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes.

Your application for a permit is incomplete. This is the Department's 1st request for additional information. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

GENERAL:

1. The requested information and comments below do not necessarily repeat the information submitted by the applicant. However, every effort has been made to concisely refer to the section, page, drawing detail number, etc. where the information has been presented in the original submittal.
2. Please submit 4 copies of all requested information. Please specify if revised information is intended to supplement, or replace, previously submitted information. Please submit all revised plans and reports as a complete package. For revisions to the narrative reports, deletions may be struckthrough (~~struckthrough~~) and additions may be shaded shaded or similar notation method. This format will expedite the review process. Please include revision date on all revised pages.
3. Please provide a summary of all revisions to drawings, and indicate the revision on each of the applicable plan sheets. Please use a consistent numbering system for drawings. If new sheets must be added to the original plan set, please use the same numbering system with a prefix or suffix to indicate the sheet was an addition, e.g. Sheet 1A, 1B, P1-A, etc.
4. Please be advised that although some comments do not explicitly request additional information, the intent of all comments shall be to request revised calculations, narrative, technical specifications, QA documentation, plan sheets, clarification to the item, and/or other information as appropriate. **Please be reminded that all calculations must be signed and sealed by the registered professional engineer (or geologist as appropriate) who prepared them.**

"More Protection, Less Process"

The following information is needed in support of the solid waste application [Chapter 62-701 and 62-709, Florida Administrative Code (F.A.C.)]. Please provide:

1. **Rule 62-701.320(1), F.A.C.** The cover letter for this permit modification references "multiple conversations" between Kessler Consulting, Inc. (KCI) and the Department. In each of these conversations, KCI represented to the Department that the purpose of this modification was to make minor changes to the facility's existing odor control system. For that reason, the Department advised KCI that the submittal of the delinquent certification of construction completion documents for the originally permitted odor control system was not necessary. From a review of this permit modification request, it appears that the original system, if installed, was subsequently replaced by an unpermitted alternate odor control system, which this permit modification request proposes to replace. Please explain this apparent discrepancy, and as applicable, provide documentation (i.e. certification of construction completion documents) that demonstrates that the originally permitted odor control system was installed. Please provide supporting information, documentation, engineering calculations, and full size "construction-level" drawings of sufficient detail to show how the Hinsilblon odor control system is designed, constructed and operated. Please be advised that the installation and operation of an alternate odor control system constitutes a modification of the facility without authorization from the Department and may subject the applicant to enforcement action by the Department.

2. **Rule 62-701.320(7)(b), F.A.C.** Application Form #62-701.900(4): Please address the following comments regarding the permit application form and provide a revised application form with the following information, where applicable:

a. Section A. "General Information" Part 14.: This section notes an anticipated construction start date of April 25, 2005. Please note that no modification of the existing odor control system shall be initiated until a permit modification is obtained for the proposed construction. **This comment is for information purposes only and does not require a response.**

3. **Rule 62-701.320(5)(b), F.A.C.** Memorandum titled "Change request for FORCE Proposal from RKB Enterprises Inc. and GOC Technologies submitted August 29, 2003," dated March 18, 2005: This memorandum makes several statements and claims regarding the proposed odor control system without providing adequate supporting information, documentation, and/or engineering calculations that demonstrate that the system will perform as indicated at the Sumter County Recycling and Composting facility. Please address the following comments regarding this memorandum and provide a revised proposal with the following information.

a. The title of this memorandum and the section titled "Modification of the Original Agreement" appear to request a change to the existing FORCE proposal, however the cover letter for this modification indicates that "the test period ended" and "FORCE is currently in the process of submitting a final report...." Please explain these apparent discrepancies.

b. **Background:** Please provide supporting information and/or documentation that the proposed system is "A proven and reliable atomizing system..." for odor control as proposed at this facility and that "GOC Technologies 500 series products... are the non-vapor versions of the GOC's 900 series products," as is stated in this section of the memorandum.

(Comment #3 cont.)

c. **New System Capabilities & Modification of the Original Agreement:**

Please provide supporting information, documentation and engineering calculations that demonstrate the capability of the system to deliver treatment product in accordance with the specific design (e.g. number of nozzles; length, diameter, path of hose; capacity of unit; application rate; etc.), proposed at this facility.

d. **New System Capabilities:** Please provide detailed vendor information, drawings, and specifications for the proposed odor control system.

e. **New System Capabilities:** Please provide a specific description of the proposed procedures for limiting the use of the system by the utilizing the "wind sensor," including the proposed criteria for determining "wind... blowing from a critical sector" and "spray times."

f. **New System Capabilities:** Please explain the reference to the "currently installed Hinsilblon product and equipment" since this does not appear to be the odor control system permitted by the Department and the cover letter for this modification states, "Currently, the Odor Control System, as approved in the Permit Renewals... issued on April 30th, 2004, is still operating..." Please be advised that the installation and operation of an alternate odor control system constitutes a modification of the facility without authorization from the Department and may subject the applicant to enforcement action by the Department.

g. **How will the change effect the trial:** Please explain the reference to the "existing treatment product, Evane-Zyme" since this does not appear to be the "originally proposed GOC 910UV" that was "approved in the Permit Renewals... issued on April 30th, 2004." Please be advised that the use of an alternate odor control solution/system constitutes a modification of the facility without authorization from the Department and may subject the applicant to enforcement action by the Department.

h. **How will the change effect the trial:** Please provide supporting information, documentation and/or engineering calculations utilized to support the statements, "The existing treatment product, Evane-Zyme, has not been consistently effective in the field," "BAT 502... has the same active ingredients and performance as... GOC 910UV," and "the new performance is expected to be greatly improved over Evane-Zyme."

4. **Rules 62-701.320(5)(b), F.A.C. Attached Drawings (2 sheets), dated February 9, 2005:** Department permits are issued for the specific processes and operations applied for and indicated on the approved drawing or exhibits. These drawings shall be full size "construction-level" drawings, signed and sealed by a professional engineer registered in Florida, prepared and submitted in accordance with Rule 62-701.320(7)(f), F.A.C., and be of sufficient detail to show how the proposed modification is designed and will be constructed and operated. Please provide construction drawings for the proposed odor control system. These drawings shall be full size "construction-level" drawings, being of sufficient detail to show how the odor control system is designed, will be installed in the tipping area, MRF building, and bio-solids storage area, and will be operated. All plans will be reviewed in their entirety after responses are received. If the timeframe for development of construction documents is expected to be greater than 90 days, the applicant may want to consider withdrawal of this application until such time as detailed designs of the facility are available.

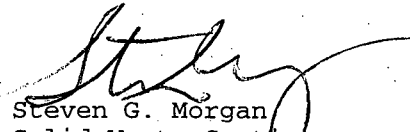
5. **Rule 62-701.320(5)(b), F.A.C. BAT 502 Test Applications:** Please provide supporting information, documentation and engineering calculations that demonstrate that the proposed odor control system will provide the application rate and contact residence time for the BAT 502 solution described by this specification document.

Please provide all responses that relate to engineering for design and operation, including plan sheets, signed and sealed by a professional engineer. Responses that relate to the facility operations should be included as part of the Operation Plan. All replacement pages should be numbered, and with revision date.

"NOTICE! Pursuant to the provisions of Section 120.60, F.S., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department may issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered questions will be submitted. If the response will require longer than 30 days to develop, you should develop a specific timetable for the submission of the requested information for Department review and consideration. Failure to comply with a timetable accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

You are requested to submit 4 copies of your response to this letter as one complete package with an original and three copies of all correspondence (with one copy sent to Ms. Susan Pelz). It is strongly recommended that you contact the Department as soon as possible to set up a meeting to discuss this letter and subsequent submittals. Please contact me at (813) 744-6100 ext. 385 to schedule the meeting.

Sincerely,


Steven G. Morgan
Solid Waste Section
Southwest District

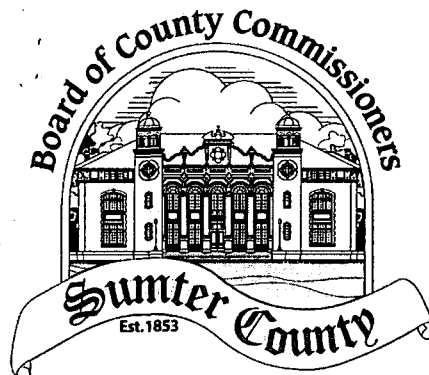
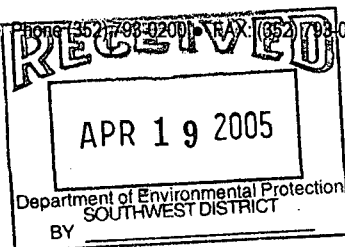
SM/sgm

cc: Joseph L. Miller, P.E., PBS&J, 482 S. Keller Rd., Orlando, FL 32804
Miriam Zimms, Kessler Consulting, Inc., 14620 N. Nebraska Ave., Tampa, FL 33613
Virginia Watson, Sumter County, 209 N. Florida Street, Bushnell, Florida 33513
Francine Joyal, FDEP Tallahassee
Susan Pelz, P.E., FDEP Tampa
Stephanie Petro, FDEP Tampa

Board of County Commissioners

Sumter County, Florida

209 North Florida Street, Suite 3 • Bushnell, FL 33513-6146 • Phone: (352) 793-0200 • FAX: (352) 793-0207
SunCom: 665-0200 • Website <http://boocc.co.sumter.fl.us>



April 7, 2005

Mr. Steve G. Morgan, Environmental Engineer
Florida Department of Environmental Protection (FDEP)
3804 Coconut Palm Drive
Tampa, Florida 33619-1352

RE: Proposed Odor Control System for the Solid Waste, Recycling, and
Composting Facility (SWRCF), Sumter County, Florida

Dear Mr. Morgan:

Please find attached three (3) copies of the Sumter County's application for an Intermediate Permit Modification of the Materials Recycling Facility Permit No. 126941-003-SO and of the Composting Facility Permit No. 126940-010-SO. This application includes a certified application form, a check for the application fee, a proposal for the new Odor Control System, an updated page of the Operations Manual and documentation that shows Sumter is classified as a small County.

As you are probably aware, there is a current Odor Control System operating at the Sumter County SWRCF, which was funded through a Florida Organics Recycling Center for Excellence (FORCE) grant and which is being utilized to meet the odor control requirements of our permits. This grant project included a testing period for the system. Since this testing period has ended, FORCE is currently in the process of submitting a final report to the FDEP, as part of the FORCE contract agreement.

After the testing period ended, the County concluded that the current system is not the most economical system for the County and that new systems needed to be researched. The County spent some time evaluating its options and negotiating terms with the vendor to eventually install a new Odor Control System. This new proposed system is expected to mitigate odor effectively, since it has already been proven successful in open area chicken houses elsewhere and it is capable of covering large spatial areas.

Richard "Dick" Hoffman, Dist 1
(352) 753-1592 or 793-0200
209 North Florida Street
Bushnell, FL 33513

Randy Mask, Dist 5
(352) 793-0200
209 North Florida Street
Bushnell, FL 33513

Joey A. Chandler, Chairman
Dist 2, (352) 748-5005
6255 CR 429
Lake Panasoffkee, FL 33538

Bernard Dew, County Administrator
(352) 793-0200
209 North Florida Street, Suite 3
Bushnell, FL 33513-6146

Michael E. Francis, Dist 3
(352) 753-1592 or 793-0200
209 North Florida Street
Bushnell, FL 33513

Gloria R. Hayward, Clerk & Auditor
(352) 793-0215
209 North Florida Street
Bushnell, FL 33513

Jim Roberts, Vice Chairman
Dist 4, (352) 793-4776
209 North Florida Street, Suite 3
Bushnell, FL 33513-6146

Randall N. Thornton
County Attorney
(352) 793-4040 P.O. Box 58
Lake Panasoffkee, FL 33538

Currently, the Odor Control System, as approved in the Permit Renewals for the Materials Recycling Facility and the Composting Facility issued on April 30th, 2004, is still operating and will continue to operate at the County's expense until the new proposed system has been approved by the FDEP. In multiple conversations between Kessler Consulting, Inc. (KCI) and yourself in the last months, the FDEP advised Sumter County to apply for a Minor Permit Modification to change the current Odor Control System and to not submit Certification of Completion documents for the current system.

The new system will only be installed after approval has been received from the FDEP. After the system is installed and proven successful, Certification of Completion documents will be submitted to the FDEP. The intent of the County is to have an Odor Control System in place that mitigates odor effectively, is economical, and practical for a small County application like ours, and to work closely with the FDEP to remain in compliance.

Please review the attached documents and contact me if you have any questions or require additional information. We look forward to having an effective Odor Control System. I look forward to hearing back from you.

Sincerely,



Bernard Dew
County Administrator

Attachment

xc: Susan Pelz, Florida Department of Environmental Protection
Chuck Jett, Superintendent, SCSWRCF, Sumter County
Tommy Hurst, Public Works Director, Sumter County
Cindy Tompkins, Sumter County
Denise Warnock, Sumter County
Miriam Zimms, Kessler Consulting, Inc.



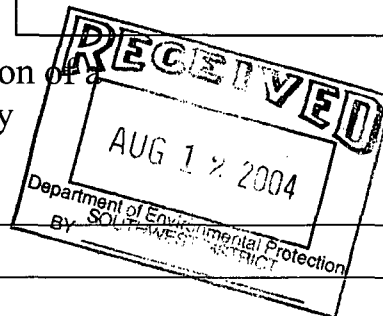
Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

D. # 62-701.900(2)
Form title: Certification of Construction Completion
Effective Date May 19, 1994

DEP Application No. _____
(Filled by DEP)

Certification of Construction Completion of a Solid Waste Management Facility



DEP Construction Permit No: 126940-008-SC County: Sumter
Name of Project: Materials Recovery Facility
Name of Owner: Sumter County Public Works
Name of Engineer: Springstead Engineering, Inc.
Type of Project: Construction of loading ramp and building addition for the Materials Recovery Facility
Cost: Estimate: \$ 25,000 Actual \$ 25,000
Site Design: Quantity: 210 ton/day Site Acreage: 120 Acres
Deviations from Plans and Application Approved by DEP: None
Please see attached drawings for constructed elevations.

Address and Telephone No. of Site: 835 CR 529, Sumterville, Florida 33538 (352) 793-3368

Name(s) of Site Supervisor: Chuck Jett

Date Site inspection is requested: As soon as possible.

This is to certify that, with the exception of any deviation noted above, the construction of the project has been completed in substantial accordance with the plans authorized by Construction

Permit No. 126941-003-SO Dated: April 4, 2004

Date: 8/11/04
Signature of Professional Engineer

Page 1 of 1

Northwest District
160 Governmental Center
Pensacola, FL 32501-5794
850-595-8360

Northeast District
7825 Baymeadows Way, Ste. B200
Jacksonville, FL 32256-7590
904-448-4300

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
407-894-7555

Southwest District
3804 Coconut Palm Dr.
Tampa, FL 33619
813-744-6100

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33901-3881
941-332-6975

Southeast District
400 North Congress Ave.
West Palm Beach, FL 33401
561-681-6600

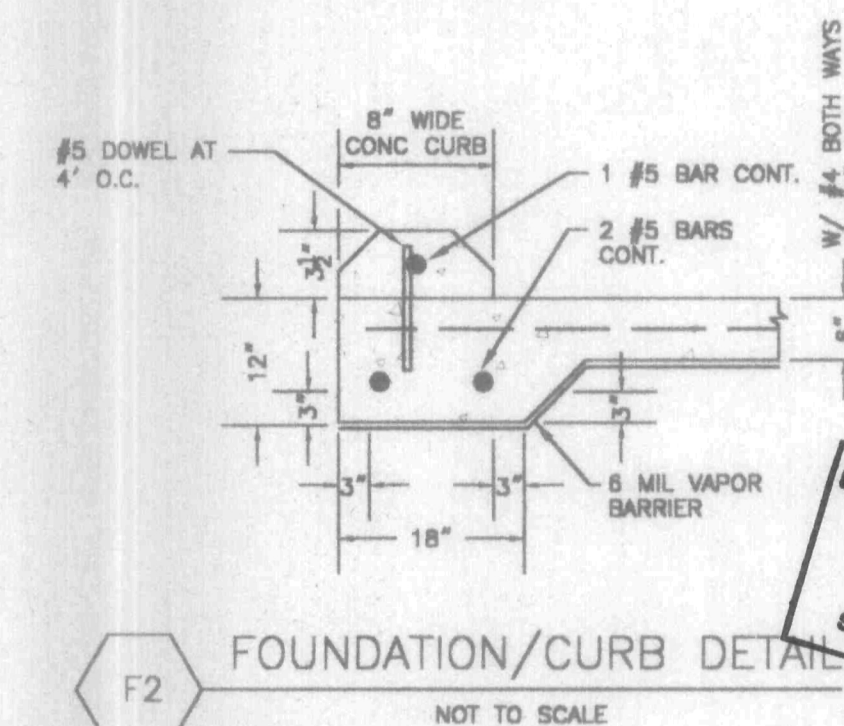
C:\Land Projects R21921100.009\dwg\Bldgfig3.dwg, Model, 05/19/04 02:03:08 PM, *** JRH***



FOUNDATION NOTES:

-
- Figure 1 is a schematic diagram of a rectangular experimental setup. The setup consists of a central rectangular area with a dashed border, surrounded by a solid border. The dimensions are labeled: the top border is 7'-8", the right border is 3", the bottom border is 7'-8", and the left border is 24" LAP. The central area contains several small triangles and a label "9' O.C." indicating a 9-foot on-center spacing.

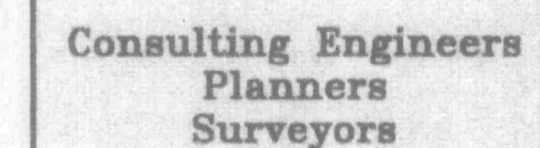
NOT TO SCALE



F2 FOUNDATION/CURB DETAIL
NOT TO SCALE

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
AUG 12 2004
SOUTHWEST DISTRICT
TAMPA

**Springstead
Engineering, Inc.**



SCALE:	FILE:	DATE:
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DRAWING:
MATERIALS RECOVERY FACILITY
FOUNDATION PLAN

CLIENT: SCBCC

JOB NO.:	SHEET:	1
9211000.009	OF:	3

AUG 03 2004