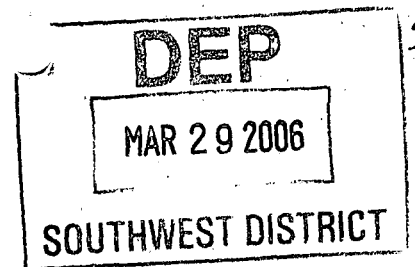


kessler consulting inc.  
innovative waste solutions



TO:

Susan Felz  
P.E., Solid Waste Manager  
DEP - Southwest District  
13051 N. Telecom Pkwy  
Tempe Terrace, FL 33057-0020

Date: 3/27/06

Project #: 06-07 F

Attention:

RE: on behalf of Miriam Zimms

We are sending you the following item/s:

Copy of Letter \_\_\_\_\_ Report \_\_\_\_\_ Prints \_\_\_\_\_

Other Article & TAG Contact List

Items are: ☒ enclosed \_\_\_\_\_ under separate cover, via: \_\_\_\_\_

Copies	Description
1	Article: "As the Worm Turns: Apopka Couple's Environmentally Friendly Business Reduces Need for Landfill Space"
1	Updated FORCE-TAG Contact Information Sheet

THESE ARE TRANSMITTED as checked below:

☐ For Approval ☒ For Your Use ☐ As Requested  
☒ For Your Information ☐ For Review & Return ☐ Sign & Return  
☐ For Review and Comment \_\_\_\_\_

Return to Kessler Consulting for future action by: \_\_\_\_\_

For Distribution to: \_\_\_\_\_

This might be of interest to you

Material and/or prints returned to your organization after loan to us

COPY TO: File,

SIGNED:

**SOLID WASTE ROUTING**

Vacant OPS

Vacant PE *Roger*

Steve Morgan *-1st, file*

John Morris

Bret Galbraith

Stephanie Watson

DATE: *4/1/06*

☐

☒

☒

☒

☒

☒

=====

**DEPOSITION AFTER REVIEW**

FILE *X*

SUSAN PELZ

☐

*4/4/06*



ORLANDO BUSINESS JRNL  
ORLANDO  
WEEKLY - 11,000  
Feb 23, 2006



PHOTOS BY JIM CARCHIDI

Bernie Moro, along with her husband Carl, sells home starter kits – complete with worms – to those interested in doing their own worm composting.

# As the worm turns

## Apopka couple's environmentally friendly business reduces need for landfill space.

BY CHRIS KAUFFMANN | STAFF WRITER

APOPKA — About five years ago, a new business wormed its way into the hearts of retirees Carl and Bernadine “Bernie” Moro.

And no wonder. All that’s really needed to keep it going is a steady supply of garbage.

The Apopka couple now own Our Vital Earth Inc., a composting worm farm — also known as a vermiculture farm — which sells worm byproducts locally and on the Internet.

The firm’s “Wonder Worm” byproducts are all-natural worm excrement and urine — known more delicately in the industry as “worm castings” and “worm tea,” respectively. The byproducts are used as organic plant fertilizers and insecticides.

In addition, Our Vital Earth sells \$169 homestarter kits — complete with



a two-pound box of worms — that allow homeowners to do their own worm composting to reduce the amount of garbage they send to landfills.

Customer Al Chiodi, who lives in Tangerine and redevelops commercial real estate projects, bought a home system and says he’s been putting the worm castings around his tomato plants. “I like it a lot,” he says. “Ev-

ery bit of food waste, except meat and cheese, goes to the worms.”

The worms will consume anything that was once grown, including kitchen refuse, grass clippings, paper and cardboard. They will not eat plastic, glass, metal or bones. Though they can eat meat, it is not suggested because it takes too long for the worms to digest.

The Moros, who have been married 55 years, are also about to start marketing dumpster-like commercial systems that would be leased or sold to restaurants, theme parks, golf courses and fish camps.

“What better legacy can we leave our kids than by cleaning up the waste we created?” asks Bernie Moro, the 74-year-old mother of nine children — eight surviving — who help their parents on a part-time basis.

PLEASE SEE WORMS.  
CONTINUED ON NEXT PAGE

CATEGORY	SOLID WASTE COLLECTION		
LOCATION	DUVAL COUNTY		
SPECS	A REGIONAL PARK/BAYMEADOWS - INCL NEW DRIVEWAYS, PARKING, SEEDING & SODDING, LANDSCAPING & FENCING, TRASH REMOVAL, SOCCER FIELDS, STREET & FIELD LIGHTING, RESTROOM/CONCESSION BLDG, CONCRETE WALKS, GROUP PAVILIONS, IRRIGATION SLEEVING & DISTRIBUTION SYSTEMS, WASTEWATER COLLECTION SYSTEMS & STORMWATER COLLECTION, ADDITIVE ALT NO. 1 WORK INCL: A PLAYGROUND AREA, ADDITIVE ALTERNATIVE NO. 2 WORK INCL: TENNIS COURT PARKING LOT		
DUE	3/29/2006	2:00 PM	302719
PRE-BID	3/14/2006	2:00 PM	MANDATORY <input checked="" type="checkbox"/>
BID#	CP-0043-06-9		
CONTACT	MARTHA ARNETT 904/630-7575 JACKSONVILLE, CITY OF PROCUREMENT AND SUPPLY DIVISION 117 WEST DUVAL STREET, STE. 335 JACKSONVILLE FL 32202		

### FINANCIAL NEWS & DAILY RECORD

#### JACKSONVILLE DAILY - 5,800

##### INVITATION TO BID

Sealed bids will be received by the City of Jacksonville, Procurement and Supply Division, Suite 335, New City Hall until the time and dates as follows:

**Wednesday, March 15, 2006  
AT 2:00 P.M.**

SC-0481-06 Port-O-Let Rental For City Of Jacksonville, Various Agencies

**\*\*Mandatory Pre-Bid Meeting: Monday, March 3, 2006 at 10:00 am, City Hall @ St James Bldg, 117 W. Duval Street, Jacksonville, Florida, 3rd Floor - Conference Room 3-C.**

**JOHN PEYTON, MAYOR  
CITY OF  
JACKSONVILLE, FLORIDA**

By: Devin Reed, Director  
Department of Procurement  
Feb. 22

00 (06-1204)

cont'd on back →



# WORMS: The Moros willingly offer to train would-be competitors in vermiculture

CONTINUED FROM PREVIOUS PAGE

To boot, Our Vital Earth does a pretty brisk business. The company sells about \$10,000 worth of products per month to homeowners, organic farmers and "a lot of doctors" who don't want to pay for yard refuse removal. They have shipped their products as far away as Alaska and Canada. "Garbage is a worldwide problem, not just local," says Carl Moro, 77.

Debbie Sponsler, section manager for Orange County's solid waste division, agrees.

"Anything we can do to reduce the amount of waste going to the landfill is a good thing," says Sponsler, noting the landfill currently has about 25 years of life left to it. "It takes a change of habits, just like recycling did, but anything that extends the life of the landfill is good for

residents of Orange County."

## Following Australia's lead

Originally from a small town in Missouri, the couple moved to this area in 1960 with their children due to health reasons. They ran an insurance business in Apopka that they sold in 1980, the same year they bought the 10 acres that's now home to the worm farm. The idea at the time was to have rental greenhouses on the property that would supplement their retirement income.

The Moros continued in the insurance business with Southern Security Life Insurance in Lake Mary until 1998, when they officially retired. However, in 2001, a customer who came to rent a greenhouse piqued their interest after telling them he planned to grow composting worms.

## Our Vital Earth Inc.

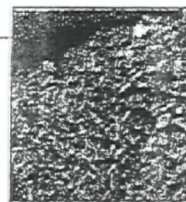
**Founded:** 2002

**Owners:** Carl and Bernadine "Bernie" Moro

**Core business:** Worm farming

**Volume:** \$10,000 per month

**Contact:** (800) 237-4780 or [www.ourvitalearth.com](http://www.ourvitalearth.com)



They went on the Internet and discovered, as Bernie Moro says, that "Australia was so much further advanced with this than the United States." In fact, the Australian government even encourages its citizens to do worm composting and will fund the worms because the country was able to reduce the amount of organic waste going to the landfill by 65 percent during a four-year period.

The Moros eventually hooked up with an Australian couple who do worm farming, and in 2002, spent three weeks with that couple learning the business. They returned and converted some of their greenhouses for producing worms. The Moros currently have 52 4-foot-by-8-foot beds of worms churning out byproducts. One bed will consume 50 pounds of garbage every two days.

## Rapid reproduction

One reason the Moros like the business so much, apart from the recycling aspect, is the fact that worms are an ever-increasing asset. Left to their own devices, the worms will double their population every nine to 12 weeks. However, the population is easy to control as the worms won't reproduce beyond what's needed to fill the available space.

The Moros are so enthusiastic about vermiculture that they have started a nonprofit entity, Save Our Vital Earth, which does outreach programs at local schools such as Princeton Elementary School in Orlando.

As well, the Moros practically invite competition, offering up two business opportunities to interested parties. One opportunity is for business associates, who would get the training and materi-

## 'Our ultimate goal is to

*create a healthier, safer and*

*cleaner environment for*

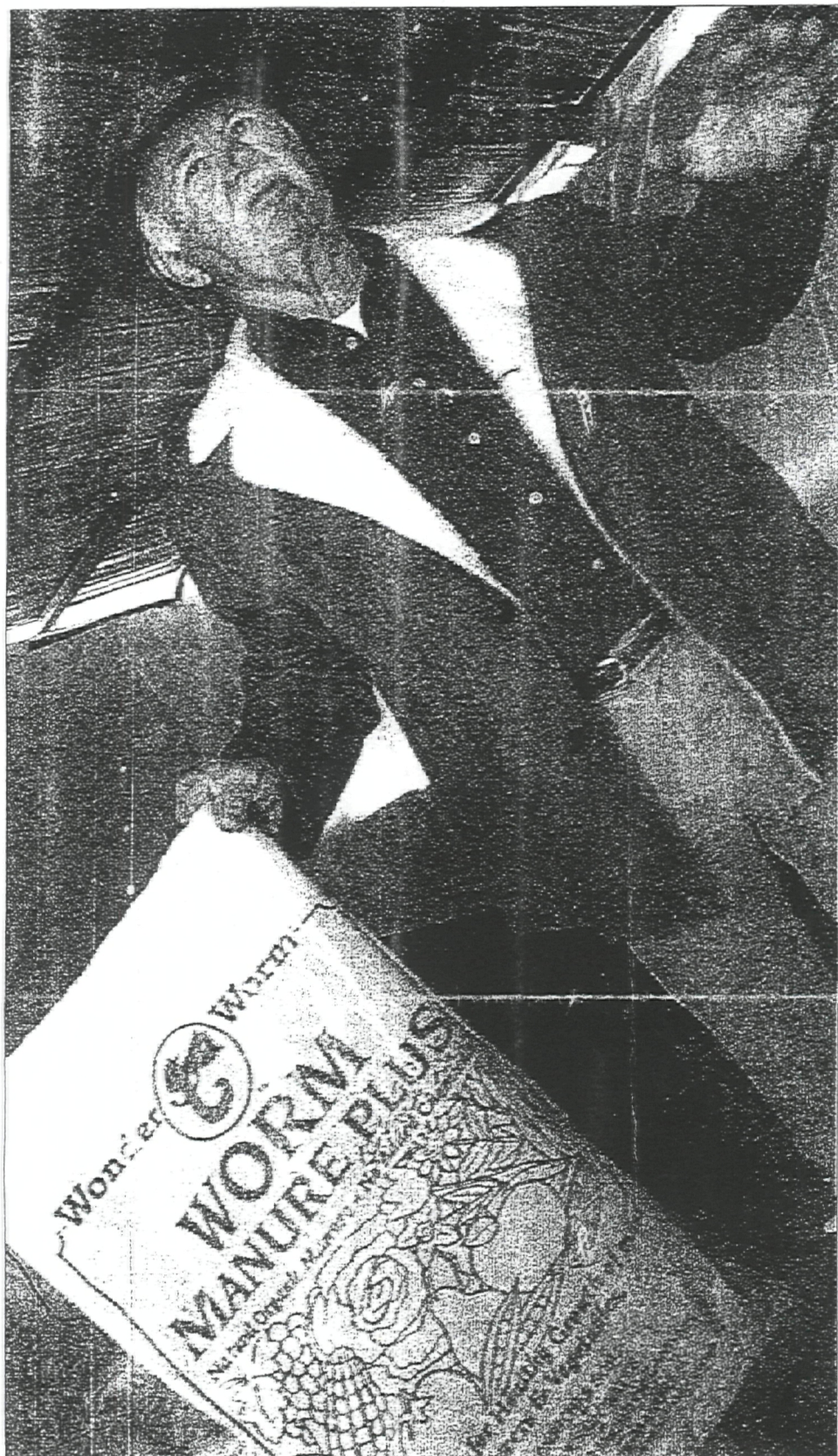
*our children and grandchildren.'*

## Carl and Bernadine "Bernie" Moro,

Owners, Our Vital Earth Inc.

als to get into the business themselves and operate separately, and the other is for associate growers, who would get the training and materials to sell products back to Our Vital Earth.

As the Moros note in their literature, "Our ultimate goal is to create a healthier, safer and cleaner environment for our children and grandchildren."



Carl Moro lifts a 25-pound bag of "worm manure."

PHOTO BY JIM CARCHIDI



# Florida Organics Recycling Center for Excellence – Contact Information

## Sector

Last Name	First Name	Company	Telephone	Fax	E-mail Address	2nd E-mail
-----------	------------	---------	-----------	-----	----------------	------------

### DIRECTORS (Administration & Technical)

Howell	Sandra	Sumter County	(352) 793-0200	(352) 793-0259	<a href="mailto:sandra.howell@sumtercountyfl.gov">sandra.howell@sumtercountyfl.gov</a>	
Kessler	Mitch	Kessler Consulting, Inc.	(813) 971-8333	(813) 971-8582	<a href="mailto:mk@kesconsult.com">mk@kesconsult.com</a>	

### SUPERINTENDENT & SPECIALIST

Jackson	Jackey	Sumter County	(352) 793-0240	(352) 793-0247	<a href="mailto:jjackson@scpw.org">jjackson@scpw.org</a>	
Stokes	Stacie	Sumter County	(352) 793-3368	(352) 568-0166	<a href="mailto:ssokes@scpw.org">sstokes@scpw.org</a>	

### TECHNICAL ADVISORY GROUP (TAG)

#### Department of Transportation

Boan	Josh	Florida DOT	(850) 414-5266	(850) 410-5808	<a href="mailto:joshua.boan@dot.state.fl.us">joshua.boan@dot.state.fl.us</a>	
------	------	-------------	----------------	----------------	--	--

#### End Users: Peat/Media Blender

Hufnagel	Dick	C&C Peat Co., Inc.	(352) 429-5808	(352) 429-5808	No email > please call / fax	
Cook	Steve	C&C Peat Co., Inc.	(352) 429-5706 x12		<a href="mailto:ccpeat@aol.com">ccpeat@aol.com</a>	

#### Feedstock: Poultry

Smith	Charles R.	Florida Poultry Federation	(813) 628-4551	(813) 620-4008	<a href="mailto:fpf290@aol.com">fpf290@aol.com</a>	
-------	------------	----------------------------	----------------	----------------	--	--

#### Private Sector Processing

Gomez	Robert	Consolidated Resource	(941) 756-0977 (941) 704-5249 (c)	(727) 535-2924	No email > please call / fax	
-------	--------	-----------------------	--------------------------------------	----------------	------------------------------	--

#### Trade Associations

Snow	Chris	Hillsborough County	(813) 276-8408	(813) 276-2960	<a href="mailto:snowc@hillsboroughcounty.org">snowc@hillsboroughcounty.org</a>	
------	-------	---------------------	----------------	----------------	--	--

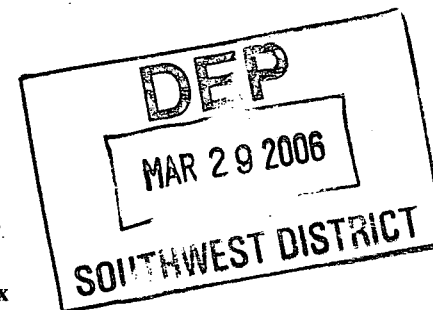
### EX-OFFICIO MEMBERS

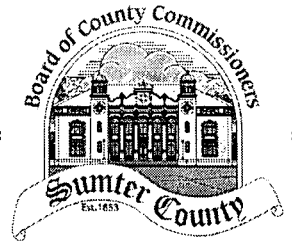
#### Project & Contract Consultant, FORCE

Zimms	Miriam	Kessler Consulting, Inc.	(813) 971-8333	(813) 971-8582	<a href="mailto:mzimms@kesconsult.com">mzimms@kesconsult.com</a>	
-------	--------	--------------------------	----------------	----------------	--	--

#### Dept of Environmental Protection

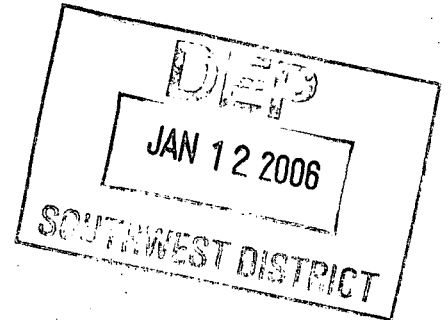
Joyal	Francine	DEP FORCE Project Manager	(850) 245-8747	(850) 245-8811	<a href="mailto:francine.joyal@dep.state.fl.us">francine.joyal@dep.state.fl.us</a>	
Pelz	Susan	DEP – Southwest District	(813) 632-7600	(813) 744-6084	<a href="mailto:susan.pelz@dep.state.fl.us">susan.pelz@dep.state.fl.us</a>	



**SUMTER COUNTY SOLID WASTE***SUMTER COUNTY, FLORIDA*PO Box 1066 • Bushnell, FL 33513 • Phone (352) 793-3368 • Fax (352) 568-0166 • [www.scpw.org](http://www.scpw.org)

January 9, 2006

Department of Environmental Protection  
Attention: Susan J. Pelz, P.E.  
Solid Waste Division  
13051 N. Telecom Pkwy,  
Temple Terrace, Florida 33637-0926



Dear Ms. Pelz:

Please see attached our Fourth Quarter 2005 Scrubber Air Discharge as per permit number 126940-010-SO; specific condition 9.d and 12.f.1.b

If you have any questions, please feel free to contact me.

Respectfully,

Jackey Jackson  
Public Works Assistant Director

Cc: Denise Warnock, Sumter County  
Miriam Zimms, Kessler Consulting  
Sandee Howell, Sumter County

---

**THE COLINAS GROUP, INC.**  
HYDROGEOLOGISTS & ENGINEERS

---

January 4, 2005

**Ms. Stacie Stokes**

Sumter County Solid Waste Facility  
P.O.Box 1066  
Bushnell, Florida 33513

Subj: Scrubber Air/Water Analytical Report  
Sumter County Composting Facility  
FDEP Permit No. 126940-010-SO  
TCG Project No. P-301

Dear Ms. Stokes:


The Colinas Group, Inc. (TCG) has completed sampling and analysis of air and water discharge from the Sumter County Composting Facility. Sampling was completed by TCG field sampling personnel on November 18, 2005, immediately prior to a scheduled shut-down of the facility. Influent and effluent air samples were collected at designated sampling ports using a mechanical air pump. The scrubber water discharge sample (WW-1) was collected at a designated sampling spigot. Samples were collected in accordance with the latest issue of the FDEP Standard Operating Procedures for Field Activities.

Collected air and water samples were properly prepared and transported to U.S. Biosystems, Inc., Boca Raton, Florida for laboratory analysis. Results of laboratory analyses are attached together with the Chain-of-Custody record for the sampling event.

If you have any questions concerning the attached laboratory report, please do not hesitate to contact me at your convenience. This report should be submitted to the Florida Department of Environmental Protection in satisfaction of the Composting Facility operating permit.

Very truly yours,

**THE COLINAS GROUP, INC.**

*1/5/06*  


Richard L. Potts, Jr. P.G.  
Principal Consultant  
Fl. P.G. Reg. No. 1113

Client #: ORL-12-060401  
Address: The Colinas Group  
509 N. Virginia Ave.  
Winter Park, FL 32789  
Attn: Rick Potts

Page: Page 1 of 1  
Date: 12/15/2005  
Log #: L121717-2

**Sample Description:**

Sumter County Landfill

**Analytical Report: Influent Air**

Date Sampled: 11/18/2005

Time Sampled: 08:17

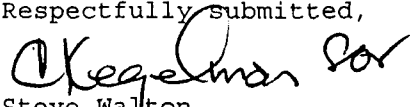
Date Received: 11/19/2005

Collected By: Client

Parameter	Results	Units	Method	MDL	RL	Extr. Date	Anly. Date	AN
<b>TPH in Air</b>								
TRPH	U C10	mg/m3	EPA 18	100	100	11/19	11/19	SV
Dilution Factor	1.0		EPA 18			11/19	11/19	SV
<b>Surrogate Recoveries:</b>								
a,a,a-Trifluorotoluene	98	%	EPA 18		59-153	11/19	11/19	SV
<b>BTEX Compounds</b>								
Benzene	U C10	mg/m3	EPA 18	1.0	1.0	11/19	11/19	SV
Toluene	9.1 C10	mg/m3	EPA 18	1.0	1.0	11/19	11/19	SV
Ethylbenzene	U C10	mg/m3	EPA 18	1.0	1.0	11/19	11/19	SV
Total Xylenes	U C10	mg/m3	EPA 18	2.0	2.0	11/19	11/19	SV
MTBE	U C10	mg/m3	EPA 18	5.0	5.0	11/19	11/19	SV
Dilution Factor	1.0		EPA 18			11/19	11/19	SV
<b>Surrogate Recoveries:</b>								
a,a,a-Trifluorotoluene	84	%	EPA 18		59-144	11/19	11/19	SV

All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.  
Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.  
Flags: CFR-Pb/Cu rule; ND-non detect (RL estimated); NFL-no free liquids; dw-dry wt; ww-wet wt; C(#)-see attached USB code  
FLDEP Flags: J(#)-estimated 1:surr. fail 2:no known QC req. 3:QC fail %R or %RPD; 4:matrix int. 5:improper fld. protocol  
FLDEP Flags: L-exceeds calibration; Q-holding time exceeded; T-value < MDL; V-present in blank  
FLDEP Flags: Y-improper preservation; B-colonies exceed range; I-result between MDL and PQL

FLDOH/NELAC# E86240 KS/NELAC# E-10360  
NC CERT# 444 ADEM ID# 40850  
SC CERT# 96031001 TN CERT# 02985  
IL/NELAC CERT# 200020 GA CERT# 917  
VA CERT# 00395 USDA Soil Permit# S-35240

Respectfully submitted,  
  
Steve Walton  
Client Technical Svcs. Manager

Client #: ORL-12-060401  
Address: The Colinas Group  
509 N. Virginia Ave.  
Winter Park, FL 32789  
Attn: Rick Potts

Page: Page 1 of 1  
Date: 12/15/2005  
Log #: L121717-3

**Sample Description:**

Sumter County Landfill

**Analytical Report: Effluent Air**

Date Sampled: 11/18/2005

Time Sampled: 08:19

Date Received: 11/19/2005

Collected By: Client

Parameter	Results	Units	Method	MDL	RL	Extr. Date	Anly. Date	AN
<b>TPH in Air</b>								
TRPH	U C10	mg/m3	EPA 18	100	100	11/19	11/19	SV
Dilution Factor	1.0		EPA 18			11/19	11/19	SV
<b>Surrogate Recoveries:</b>								
a,a,a-Trifluorotoluene	95	%	EPA 18		59-153	11/19	11/19	SV
<b>BTEX Compounds</b>								
Benzene	U C10	mg/m3	EPA 18	1.0	1.0	11/19	11/19	SV
Toluene	8.6 C10	mg/m3	EPA 18	1.0	1.0	11/19	11/19	SV
Ethylbenzene	U C10	mg/m3	EPA 18	1.0	1.0	11/19	11/19	SV
Total Xylenes	U C10	mg/m3	EPA 18	2.0	2.0	11/19	11/19	SV
MTBE	U C10	mg/m3	EPA 18	5.0	5.0	11/19	11/19	SV
Dilution Factor	1.0		EPA 18			11/19	11/19	SV
<b>Surrogate Recoveries:</b>								
a,a,a-Trifluorotoluene	79	%	EPA 18		59-144	11/19	11/19	SV

All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.  
Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.  
Flags: CFR-Pb/Cu rule; ND-non detect(RL estimated); NFL-no free liquids; dw-dry wt; ww-wet wt; C(#)-see attached USB code  
FLDEP Flags: J(#)-estimated 1:surr. fail 2:no known QC req. 3:QC fail %R or %RPD; 4:matrix int. 5:improper fld. protocol  
FLDEP Flags: L-exceeds calibration; Q-holding time exceeded; T-value < MDL; V-present in blank  
FLDEP Flags: Y-improper preservation; B-colonies exceed range; I-result between MDL and PQL

FLDOH/NELAC# E86240 KS/NELAC# E-10360  
NC CERT# 444 ADEM ID# 40850  
SC CERT# 96031001 TN CERT# 02985  
IL/NELAC CERT# 200020 GA CERT# 917  
VA CERT# 00395 USDA Soil Permit# S-35240

Respectfully submitted,

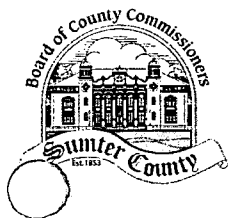
  
Steve Walton

Client Technical Svcs. Manager

**Most Common Flags (Qualifiers used by USB)****Flag    Meaning**

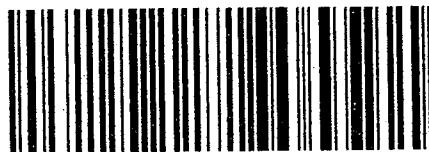
- C10:** NELAC Certification is not offered for this method.
- C13:** MS / MSD reported from a post-digestion / distillation spike.
- C18:** As per client request, sample for Dissolved Metal analysis was filtered and preserved by the laboratory upon receipt.
- C19:** Sample received for Ortho phosphorous analysis was not field filtered. Sample was filtered by the laboratory upon receipt
- C21:** See attached Case Narrative or Non-Conformance / Corrective Action Report.
- C22:** The addition of Spike solution was inadvertently omitted.
- C23:** Detection Limit has been elevated due to high negative values.
- C24:** Detection Limit has been adjusted to sample volume.
- C25:** Detection Limit has been elevated due to ICSA and /or ICSAB recovering outside control limits.
- C26:** As per client request, the Ferrous Iron analysis has been performed in the laboratory
- C27:** 2-Chloroethyl vinyl ether is subject to chemical degradation in presence of acid. Therefore, it is not present in MS and MSD since the parent matrix sample, (MSAMP) was preserved with hydrochloric acid.
- C50:** The addition of Surrogate (s) was inadvertently omitted.
- C58:** Continuing and/or Closing Calibration Check Standard recovery was below the limit allowed by method. Sample was analyzed twice. Sample results were evaluated and reported based on MDL supporting analysis of lower concentrations.
- C59:** Result was based on a one-point calibration
- C61:** The LCS (D) % Recovery has recovered above acceptable limits. The reported target analyte is Below Detection Limit (BDL) establishing that there is no high biased result reported.





Sumter County Solid Waste  
P. O. Box 1066  
Bushnell, FL 33513-0058

**CERTIFIED MAIL™**



7002 2030 0005 8996 9394

Florida Department of Environmental Protection  
Solid Waste Division  
Attn: Susan J. Pelz  
13051 N. Telecom Pkwy.,  
Temple Terrace, Florida 33637-0926

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Fl Dept. of Env. Protection  
Solid Waste  
Attn: Susan J. Pelz  
13051 N. Telecom Pkwy.  
Temple Terrace, FL  
33637-0926

2. Article Number  
(Transfer from)

7002 2030 0005 8996 9394

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

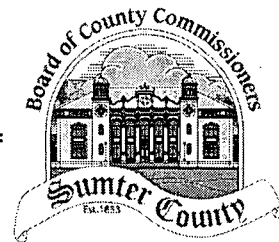
☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

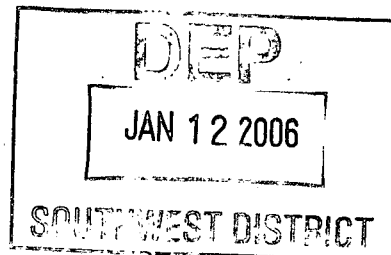
**SUMTER COUNTY SOLID WASTE***SUMTER COUNTY, FLORIDA*

PO Box 1066 • Bushnell, FL 33513 • Phone (352) 793-3368 • Fax (352) 568-0166 • www.scpw.org



January 9, 2006

Department of Environmental Protection  
Attention: Susan J. Pelz, P.E.  
Solid Waste Division  
13051 N. Telecom Pkwy.,  
Temple Terrace, Florida 33637-0926



Dear Ms. Pelz:

Please see attached our Fourth Quarter 2005 Scrubber Water Discharge as per permit number 126940-010-SO; specific condition 9.d and 12.f.1.a

If you have any questions, please feel free to contact me.

Respectfully,

Jackey Jackson  
Public Works Assistant Director

Cc: Denise Warnock, Sumter County  
Miriam Zimms, Kessler Consulting  
Santee Howell, Sumter County

---

**THE COLINAS GROUP, INC.**  
**HYDROGEOLOGISTS & ENGINEERS**

---

January 4, 2005

**Ms. Stacie Stokes**

Sumter County Solid Waste Facility  
P.O.Box 1066  
Bushnell, Florida 33513

Subj: Scrubber Air/Water Analytical Report  
Sumter County Composting Facility  
FDEP Permit No. 126940-010-SO  
TCG Project No. P-301

Dear Ms. Stokes:

The Colinas Group, Inc. (TCG) has completed sampling and analysis of air and water discharge from the Sumter County Composting Facility. Sampling was completed by TCG field sampling personnel on November 18, 2005, immediately prior to a scheduled shut-down of the facility. Influent and effluent air samples were collected at designated sampling ports using a mechanical air pump. The scrubber water discharge sample (WW-1) was collected at a designated sampling spigot. Samples were collected in accordance with the latest issue of the FDEP Standard Operating Procedures for Field Activities.

Collected air and water samples were properly prepared and transported to U.S. Biosystems, Inc., Boca Raton, Florida for laboratory analysis. Results of laboratory analyses are attached together with the Chain-of-Custody record for the sampling event.

If you have any questions concerning the attached laboratory report, please do not hesitate to contact me at your convenience. This report should be submitted to the Florida Department of Environmental Protection in satisfaction of the Composting Facility operating permit.

Very truly yours,

**THE COLINAS GROUP, INC.**

1/5/06  


Richard L. Potts, Jr. P.G.  
Principal Consultant  
Fl. P.G. Reg. No. 1113

Client #: ORL-12-060401  
 Address: The Colinas Group  
 509 N. Virginia Ave.  
 Winter Park, FL 32789  
 Attn: Rick Potts

Page: Page 1 of 3  
 Date: 12/15/2005  
 Log #: L121717-1

### Sample Description:

Sumter County Landfill

### Analytical Report: WW-1

Date Sampled: 11/18/2005  
 Time Sampled: 08:28  
 Date Received: 11/19/2005  
 Collected By: Client

Parameter	Results	Units	Method	MDL	RL	Extr. Date	Anly. Date	AN
<b>General Chemistry</b>								
Cyanide	0.0021 I	mg/l	335.3	0.0017	0.0050	11/29	11/29	IG
pH	6.17	pH Units	150.1	0.0100	0.100	11/22	11/22	JK
<b>Florida Petroleum Range Organics</b>								
TPH(C8-C40)	27	mg/l	FLPRO	0.15	0.65	11/23	11/24	RR
Dilution Factor	1.0		FLPRO			11/23	11/24	RR
<b>Surrogate Recoveries:</b>								
o-Terphenyl	66 IL	%	FLPRO		82-142	11/23	11/24	RR
Pentatriacontane	17	%	FLPRO		10-152	11/23	11/24	RR
<b>Volatile Organic Compounds</b>								
Acetone	6400	ug/l	5030/8260	80	1000	11/21	11/21	BL
Acrolein	U	ug/l	5030/8260	4.6	100	11/22	11/22	BL
Acrylonitrile	U	ug/l	5030/8260	7.6	10	11/22	11/22	BL
Benzene	U	ug/l	5030/8260	5.5	10	11/22	11/22	BL
Bromobenzene	U	ug/l	5030/8260	7.3	10	11/22	11/22	BL
Bromochloromethane	U	ug/l	5030/8260	7.1	10	11/22	11/22	BL
Bromodichloromethane	U	ug/l	5030/8260	2.8	6.0	11/22	11/22	BL
Bromoform	U	ug/l	5030/8260	4.6	10	11/22	11/22	BL
Bromomethane	U	ug/l	5030/8260	2.7	20	11/22	11/22	BL
n-Butylbenzene	U	ug/l	5030/8260	6.4	10	11/22	11/22	BL
sec-Butylbenzene	U	ug/l	5030/8260	7.3	10	11/22	11/22	BL
tert-Butylbenzene	U	ug/l	5030/8260	8.2	10	11/22	11/22	BL
Carbon Disulfide	U	ug/l	5030/8260	8.6	100	11/22	11/22	BL
Carbon Tetrachloride	U	ug/l	5030/8260	6.3	10	11/22	11/22	BL
Chlorobenzene	U	ug/l	5030/8260	5.9	10	11/22	11/22	BL
Chloroethane	U	ug/l	5030/8260	5.4	10	11/22	11/22	BL
2-Chloroethylvinyl Eth	U	ug/l	5030/8260	2.8	100	11/22	11/22	BL
Chloroform	U	ug/l	5030/8260	5.8	10	11/22	11/22	BL

Client #: ORL-12-060411  
 Address: The Colinas Group  
 509 N. Virginia Ave.  
 Winter Park, FL 32789  
 Attn: Rick Potts

Page: Page 2 of 3  
 Date: 12/15/2005  
 Log #: L121717-1

Sample Description:

Sumter County Landfill

Analytical Report: WW-1

Date Sampled: 11/18/2005

Time Sampled: 08:28

Date Received: 11/19/2005

Collected By: Client

Parameter	Results	Units	Method	MDL	RL	Extr. Date	Anly. Date	AN
<b>Volatile Organic Compounds (continued)</b>								
Chloromethane	U	ug/l	5030/8260	4.1	10	11/22	11/22	BL
2-Chlorotoluene	U	ug/l	5030/8260	6.0	10	11/22	11/22	BL
4-Chlorotoluene	U	ug/l	5030/8260	4.8	10	11/22	11/22	BL
1,2-Dibromo-3-Chloropr	U	ug/l	5030/8260	5.6	10	11/22	11/22	BL
Dibromochloromethane	U	ug/l	5030/8260	2.3	4.0	11/22	11/22	BL
Dibromomethane	U	ug/l	5030/8260	5.4	10	11/22	11/22	BL
1,2-Dibromoethane	U	ug/l	5030/8260	5.6	10	11/22	11/22	BL
1,2-Dichlorobenzene	U	ug/l	5030/8260	5.3	10	11/22	11/22	BL
1,3-Dichlorobenzene	U	ug/l	5030/8260	5.9	10	11/22	11/22	BL
1,4-Dichlorobenzene	16	ug/l	5030/8260	4.4	10	11/22	11/22	BL
Dichlorodifluoromethan	U	ug/l	5030/8260	6.0	10	11/22	11/22	BL
1,1-Dichloroethane	U	ug/l	5030/8260	5.4	10	11/22	11/22	BL
1,2-Dichloroethane	U	ug/l	5030/8260	5.1	10	11/22	11/22	BL
1,1-Dichloroethene	U	ug/l	5030/8260	8.4	10	11/22	11/22	BL
cis-1,2-Dichloroethene	U	ug/l	5030/8260	5.7	10	11/22	11/22	BL
trans-1,2-Dichloroethe	U	ug/l	5030/8260	6.6	10	11/22	11/22	BL
1,2-Dichloropropane	U	ug/l	5030/8260	5.4	10	11/22	11/22	BL
1,3-Dichloropropane	U	ug/l	5030/8260	5.2	10	11/22	11/22	BL
2,2-Dichloropropane	U	ug/l	5030/8260	5.1	10	11/22	11/22	BL
1,1-Dichloropropene	U	ug/l	5030/8260	6.9	10	11/22	11/22	BL
trans-1,3-Dichloroprop	U	ug/l	5030/8260	1.4	2.0	11/22	11/22	BL
cis-1,3-Dichloropropen	U	ug/l	5030/8260	1.2	2.0	11/22	11/22	BL
Ethylbenzene	U	ug/l	5030/8260	5.8	10	11/22	11/22	BL
Hexachlorobutadiene	U	ug/l	5030/8260	5.3	5.0	11/22	11/22	BL
2-Hexanone	U	ug/l	5030/8260	4.3	100	11/22	11/22	BL
Isopropyl Benzene	U	ug/l	5030/8260	6.6	8.0	11/22	11/22	BL
4-Isopropyl Toluene	U	ug/l	5030/8260	8.2	10	11/22	11/22	BL
MEK(2-Butanone)	12000	ug/l	5030/8260	92	1000	11/21	11/21	BL
Methylene Chloride	U	ug/l	5030/8260	7.1	50	11/22	11/22	BL
MIBK(4-Methyl-2-Pentan	U	ug/l	5030/8260	5.9	100	11/22	11/22	BL
MTBE	110	ug/l	5030/8260	8.0	50	11/22	11/22	BL
Naphthalene	U	ug/l	5030/8260	7.5	10	11/22	11/22	BL
n-Propylbenzene	U	ug/l	5030/8260	6.0	10	11/22	11/22	BL
Styrene	15	ug/l	5030/8260	4.8	10	11/22	11/22	BL
1,1,1,2-Tetrachloroeth	U	ug/l	5030/8260	1.4	10	11/22	11/22	BL
1,1,2,2-Tetrachloroeth	U	ug/l	5030/8260	2.0	2.0	11/22	11/22	BL
Tetrachloroethene	U	ug/l	5030/8260	7.0	10	11/22	11/22	BL
Toluene	59	ug/l	5030/8260	5.4	10	11/22	11/22	BL
Total Xylenes	47	ug/l	5030/8260	12	20	11/22	11/22	BL

Client #: ORL-12-060401  
Address: The Colinas Group  
509 N. Virginia Ave.  
Winter Park, FL 32789  
Attn: Rick Potts

Page: Page 3 of 3  
Date: 12/15/2005  
Log #: L121717-1

**Sample Description:**

Sumter County Landfill

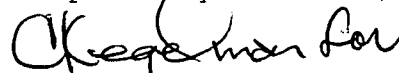
**Analytical Report:** WW-1  
Date Sampled: 11/18/2005  
Time Sampled: 08:28  
Date Received: 11/19/2005  
Collected By: Client

Parameter	Results	Units	Method	MDL	RL	Extr. Date	Anly. Date	AN
<b>Volatile Organic Compounds (continued)</b>								
1,2,3-Trichlorobenzene	U	ug/l	5030/8260	9.8	10	11/22	11/22	BL
1,2,4-Trichlorobenzene	U	ug/l	5030/8260	3.9	10	11/22	11/22	BL
1,1,1-Trichloroethane	U	ug/l	5030/8260	6.5	10	11/22	11/22	BL
Trichloroethene	U	ug/l	5030/8260	7.5	10	11/22	11/22	BL
1,1,2-Trichloroethane	U	ug/l	5030/8260	4.9	10	11/22	11/22	BL
1,2,3-Trichloropropane	U	ug/l	5030/8260	1.8	2.0	11/22	11/22	BL
Trichlorofluoromethane	U	ug/l	5030/8260	3.3	10	11/22	11/22	BL
1,2,4-Trimethylbenzene	U	ug/l	5030/8260	5.7	10	11/22	11/22	BL
1,3,5-Trimethylbenzene	U	ug/l	5030/8260	5.9	10	11/22	11/22	BL
Vinyl Acetate	U	ug/l	5030/8260	3.7	100	11/22	11/22	BL
Vinyl Chloride	U	ug/l	5030/8260	4.2	10	11/22	11/22	BL
Dilution Factor	10		5030/8260			11/22	11/22	BL
<b>Surrogate Recoveries:</b>								
Dibromofluoromethane	96	%	5030/8260		68-145	11/22	11/22	BL
Toluene-D8	89	%	5030/8260		62-133	11/22	11/22	BL
4-Bromofluorobenzene	99	%	5030/8260		56-135	11/22	11/22	BL

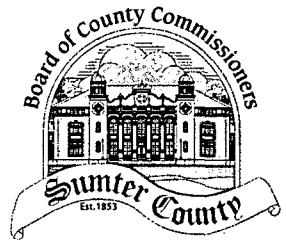
All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.  
Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.  
Flags: CFR-Pb/Cu rule; ND-non detect (RL estimated); NFL-no free liquids; dw-dry wt; ww-wet wt; C(#)-see attached USB code  
FLDEP Flags: J(#)-estimated 1:surr. fail 2:no known QC req. 3:QC fail %R or %RPD; 4:matrix int. 5:improper fld. protocol  
FLDEP Flags: L-exceeds calibration; Q-holding time exceeded; T-value < MDL; V-present in blank  
FLDEP Flags: Y-improper preservation; B-colonies exceed range; I-result between MDL and PQL

FLDOH/NELAC# E86240	KS/NELAC# E-10360
NC CERT# 444	ADEM ID# 40850
SC CERT# 96031001	TN CERT# 02985
IL/NELAC CERT# 200020	GA CERT# 917
VA CERT# 00395	USDA Soil Permit# S-35240

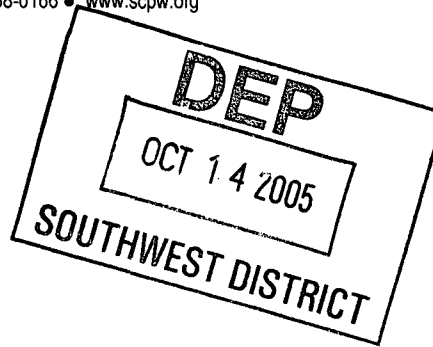
Respectfully submitted,



Steve Walton  
Client Technical Svcs. Manager

**SUMTER COUNTY SOLID WASTE***SUMTER COUNTY, FLORIDA*PO Box 1066 • Bushnell, FL 33513 • Phone (352) 793-3368 • Fax (352) 568-0166 • [www.scpw.org](http://www.scpw.org)

October 12, 2005



Department of Environmental Protection  
Attention: Susan J. Pelz, P.E.  
Solid Waste Division  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Dear Ms. Pelz:

Please see attached our Third Quarter 2005 Scrubber Air Discharge as per permit number 126940-010-SO; specific condition 9.d and 12.f.1.b

If you have any questions, please feel free to contact me.

Respectfully,

Chuck Jett  
Solid Waste Superintendent

Cc: Denise Warnock, Sumter County  
Miriam Zimms, Kessler Consulting  
Santee Howell, Sumter County

Client #: ORL-12-060401  
 Address: The Colinas Group  
 509 N. Virginia Ave.  
 Winter Park, FL 32789  
 Attn: Rick Potts

Page: Page 1 of 1  
 Date: 09/20/2005  
 Log #: L118036-1

### Sample Description:

Sumter Cty. Landfill

Analytical Report: Influent  
 Date Sampled: 09/12/2005  
 Time Sampled: 15:00  
 Date Received: 09/12/2005  
 Collected By: Client

Parameter	Results	Units	Method	MDL	RL	Extr. Date	Anly. Date	AN
<b>TPH in Air</b>								
TRPH	U C10	mg/m3	EPA 18	100	100	09/13	09/13	AG
Dilution Factor	1.0		EPA 18			09/13	09/13	AG
<b>Surrogate Recoveries:</b>								
a,a,a-Trifluorotoluene	85	%	EPA 18		59-144	09/13	09/13	AG
<b>BTEX Compounds</b>								
Benzene	U C10	mg/m3	EPA 18	1.0	1.0	09/13	09/13	AG
Toluene	U C10	mg/m3	EPA 18	1.0	1.0	09/13	09/13	AG
Ethylbenzene	U C10	mg/m3	EPA 18	1.0	1.0	09/13	09/13	AG
Total Xylenes	2.1 C10	mg/m3	EPA 18	2.0	2.0	09/13	09/13	AG
MTBE	U C10	mg/m3	EPA 18	5.0	5.0	09/13	09/13	AG
Dilution Factor	1.0		EPA 18			09/13	09/13	AG
<b>Surrogate Recoveries:</b>								
a,a,a-Trifluorotoluene	98	%	EPA 18		59-144	09/13	09/13	AG

All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.  
 Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.  
 Flags: CFR-Pb/Cu rule; ND-non detect (RL estimated); NFL-no free liquids; dw-dry wt; ww-wet wt; C(=) see attached USB code  
 FLDEP Flags: J(=)-estimated 1:surr. fail 2:no known QC req. 3:QC fail %R or %RPD; 4:matrix int. 5:improper fld. protocol  
 FLDEP Flags: L-exceeds calibration; Q-holding time exceeded; T-value < MDL; V-present in blank  
 FLDEP Flags: Y-improper preservation; B-colonies exceed range; I-result between MDL and POL

FLDOH/NELAC# E86240  
 NC CERT# 444  
 SC CERT# 96031001  
 IL/NELAC CERT# 200020  
 VA CERT# 00395  
 VA CERT# 00395

KS/NELAC# E-10360  
 ADEM ID# 40850  
 TN CERT# 02985  
 GA CERT# 917  
 USDA Soil Permit# S-35240

Respectfully submitted,

Steve Walton  
 Client Technical Svcs. Manager



Client #: ORL-12-060401  
 Address: The Colinas Group  
 509 N. Virginia Ave.  
 Winter Park, FL 32789  
 Attn: Rick Potts

Page: Page 1 of 1  
 Date: 09/20/2005  
 Log #: L118036-2

## Sample Description:

Sumter Cty. Landfill

## Analytical Report: Effluent

Date Sampled: 09/12/2005  
 Time Sampled: 15:01  
 Date Received: 09/12/2005  
 Collected By: Client

Parameter	Results	Units	Method	MDL	RL	Extr. Date	Anly. Date	AN
<b>TPH in Air</b>								
TRPH	150 C10	mg/m3	EPA 18	100	100	09/14	09/14	AG
Dilution Factor	1.0		EPA 18			09/14	09/14	AG
<b>Surrogate Recoveries:</b>								
a,a,a-Trifluorotoluene	71	%	EPA 18		59-144	09/14	09/14	AG
<b>BTEX Compounds</b>								
Benzene	1.4 C10	mg/m3	EPA 18	1.0	1.0	09/14	09/14	AG
Toluene	6.8 C10	mg/m3	EPA 18	1.0	1.0	09/14	09/14	AG
Ethylbenzene	1.4 C10	mg/m3	EPA 18	1.0	1.0	09/14	09/14	AG
Total Xylenes	5.3 C10	mg/m3	EPA 18	2.0	2.0	09/14	09/14	AG
MTBE	U C10	mg/m3	EPA 18	5.0	5.0	09/14	09/14	AG
Dilution Factor	1.0		EPA 18			09/14	09/14	AG
<b>Surrogate Recoveries:</b>								
a,a,a-Trifluorotoluene	93	%	EPA 18		59-144	09/14	09/14	AG

All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.  
 Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.  
 Flags: CFR-Pb/Cu rule; ND-non detect (RL estimated); NFL-no free liquids; dw-dry wt; ww-wet wt; C(=)-see attached USB code  
 FLDEP Flags: J(=)-estimated 1:surr. fail 2:no known OC req. 3:OC fail &R or &RPD; 4:matrix int. 5:improper fld. protocol  
 FLDEP Flags: L-exceeds calibration; Q-holding time exceeded; T-value < MDL; V-present in blank  
 FLDEP Flags: Y-improper preservation; B-colonies exceed range; I-result between MDL and PQL

FLDOH/NELAC# E86240

KS/NELAC# E-10360

NC CERT# 444

ADEM ID# 40850

SC CERT# 96031001

TN CERT# 02985

IL/NELAC CERT# 200020

GA CERT# 917

VA CERT# 00395

USDA Soil Permit# S-35240

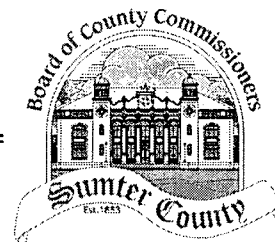
Respectfully submitted,

Steve Walton  
 Client Technical Svcs. Manager

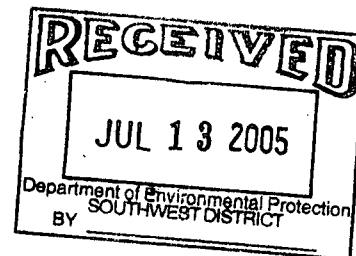
# SUMTER COUNTY SOLID WASTE

SUMTER COUNTY, FLORIDA

PO Box 1066 • Bushnell, FL 33513 • Phone (352) 793-3368 • Fax (352) 568-0166 • www.scpw.org



July 11, 2005



Department of Environmental Protection  
Attention: Susan J. Pelz, P.E.  
Solid Waste Division  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Dear Ms. Pelz:

Please see attached our Second Quarter 2005 Scrubber Air Discharge as per permit number 126940-010-SO; specific condition 9.d and 12.f.1.b

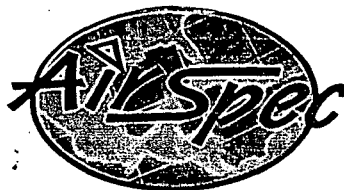
If you have any questions, please feel free to contact me.

Respectfully,

Chuck Jett  
Solid Waste Superintendent

Cc: Denise Warnock, Sumter County  
Miriam Zimms, Kessler Consulting  
Santee Howell, Sumter County

1114 W. Dixie Ave  
Leesburg, FL 34748  
Email: [Info@airspec.org](mailto:Info@airspec.org)



Office - 321-251-6656  
Fax - 321-251-6676  
[www.airspec.org](http://www.airspec.org)

May 27, 2005

Sumter County Solid Waste Facility  
P.O. Box 1066  
Bushnell, FL 33513

Attn: Mr. Chuck Jet

RE: Scrubber Water Discharge & Bio-filter Test Results  
Sumter County Solid Waste Management Facility  
Second Quarter 2005

Dear Mr. Jet,

Air Spec has completed the second quarter air and scrubber water sampling as required by Specific Conditions No. 9D of the composting permit number 126940-010-SO. These samples were taken on April 28, 2005. The air was sampled prior to entering the scrubber, "Before", and at the outlet of the bio-filter, "After". The air samples were tested for BTEX and TRPH. The water sample was obtained from the out flow spicket. The results are attached for your use.

If you should need additional information or have questions concerning the report, please feel free to contact our office.

Very Truly Yours,  
Air Spec

A handwritten signature in black ink, appearing to read 'Patricia Snowdon'.

Patricia Snowdon  
Senior Environmental Scientist

Attachments

cc: Mr. Steve Morgan, FDEP Tampa  
Ms. Miriam Zimms, Kessler Consulting



## Analytical Data

Client: Air Spec

Job Number: 660-1606.1

Client Sample ID: AIR-BEFORE SCRUBBER

Lab Sample ID: 660-1606-1

Date Sampled: 04/28/2005 1100

Client Matrix: Air - Tedlar

Date Received: 04/28/2005 1435

## EPA-18 Volatile Organic Compounds in Air

Method: EPA-18

Analysis Batch: 660-5830

Instrument ID: VARIAN PID/FID

Preparation: N/A

Lab File ID: 2D28G13.d

Dilution: 1.0

Initial Weight/Volume:

Date Analyzed: 04/29/2005 1033

Final Weight/Volume: 25 mL

Date Prepared: N/A

Injection Volume:

Analyte	Result (mg/m3)	Qualifier	MDL	PQL
Benzene	0.16	U	0.16	1.0
Ethylbenzene	0.24	U	0.24	1.0
Toluene	0.43	I	0.20	1.0
m-Xylene & p-Xylene	0.26	I	0.24	1.0
o-Xylene	0.24	U	0.24	1.0
Methyl tert-butyl ether	0.40	U	0.40	1.0
Total Hydrocarbons	0.80	U	0.80	10

## Analytical Data

Client: ~~Air Spec~~

Job Number: 660-1606.1

Client Sample ID: AIR-AFTER SCRUBBER

Lab Sample ID: 660-1606-2

Date Sampled: 04/28/2005 1100

Client Matrix: Air - Tedlar

Date Received: 04/28/2005 1435

## EPA-18 Volatile Organic Compounds in Air

Method: EPA-18

Analysis Batch: 660-5830

Instrument ID: VARIAN PID/FID

Preparation: N/A

Lab File ID: 2D28G12.d

Dilution: 1.0

Initial Weight/Volume:

Date Analyzed: 04/29/2005 1003

Final Weight/Volume: 25 mL

Date Prepared: N/A

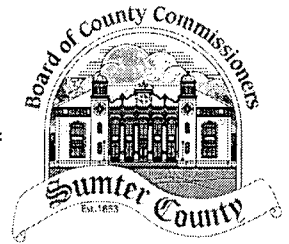
Injection Volume:

Analyte	Result (mg/m3)	Qualifier	MDL	PQL
Benzene	0.16	U	0.16	1.0
Ethylbenzene	0.24	U	0.24	1.0
Toluene	1.6		0.20	1.0
m-Xylene & p-Xylene	0.24	U	0.24	1.0
o-Xylene	0.24	U	0.24	1.0
Methyl tert-butyl ether	0.40	U	0.40	1.0
Total Hydrocarbons	7.6	I	0.80	10

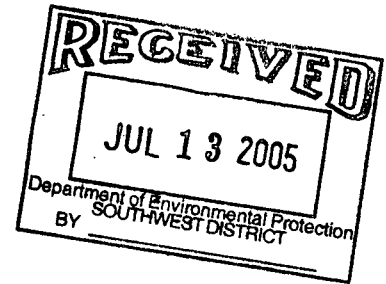
# SUMTER COUNTY SOLID WASTE

SUMTER COUNTY, FLORIDA

PO Box 1066 • Bushnell, FL 33513 • Phone (352) 793-3368 • Fax (352) 568-0166 • www.scpw.org



July 11, 2005



Department of Environmental Protection  
Attention: Susan J. Pelz, P.E.  
Solid Waste Division  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Dear Ms. Pelz:

Please see attached our Second Quarter 2005 Scrubber Water Discharge as per permit number 126940-010-SO; specific condition 9.d and 12.f.1.a

If you have any questions, please feel free to contact me.

Respectfully,

Chuck Jeff  
Solid Waste Superintendent

Cc: Denise Warnock, Sumter County  
Miriam Zimms, Kessler Consulting  
Santee Howell, Sumter County

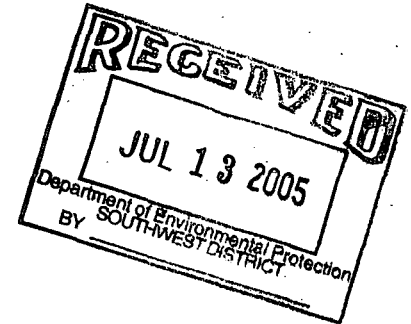
1114 W. Dixie Ave  
Leesburg, FL 34748  
Email: [info@airspec.org](mailto:info@airspec.org)



Office - 321-251-6656  
Fax - 321-251-6676  
[www.airspec.org](http://www.airspec.org)

May 27, 2005

Sumter County Solid Waste Facility  
P.O. Box 1066  
Bushnell, FL 33513



Attn: Mr. Chuck Jet

RE: Scrubber Water Discharge & Bio-filter Test Results  
Sumter County Solid Waste Management Facility  
Second Quarter 2005

Dear Mr. Jet,

Air Spec has completed the second quarter air and scrubber water sampling as required by Specific Conditions No. 9D of the composting permit number 126940-010-SO. These samples were taken on April 28, 2005. The air was sampled prior to entering the scrubber, "Before", and at the outlet of the bio-filter, "After". The air samples were tested for BTEX and TRPH. The water sample was obtained from the out flow spicket. The results are attached for your use.

If you should need additional information or have questions concerning the report, please feel free to contact our office.

Very Truly Yours,  
Air Spec

A handwritten signature in black ink, appearing to read "Patricia Snowdon".

Patricia Snowdon  
Senior Environmental Scientist

Attachments

cc: Mr. Steve Morgan, FDEP Tampa  
Ms. Miriam Zimms, Kessler Consulting



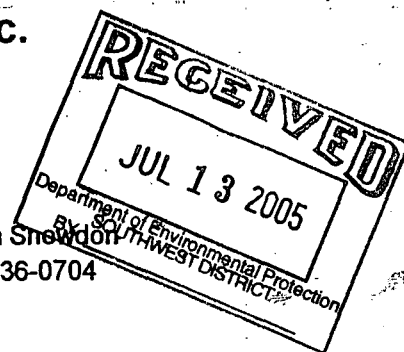


# PC&B Environmental Laboratories, Inc.

210 Park Road, Oviedo, Florida 32765  
Phone: 407-359-7194 Fax: 407-359-7197

Client : Air Spec  
1114 W. Dixie Ave  
Leesburg, FL 34748-

Contact : Patricia Snowden  
Phone : (352) 636-0704



Laboratory Reference Number : 205040343

Project Name : SCPW-2nd Q-2005

Project Number :

Sample temperature at time of receipt: 2 degrees C

Chain of Custody :

Laboratory ID	Matrix	Client ID	Status	Date/Time Sampled
205040343-1	Water	DISCHARGE	RUN	04/28/2005

Number	Parameter	Description
1	FL-PRO	Petroleum Hydrocarbons
1	EPA 602 by 8260	Volatile Organic Aromatics
1	EPA 9012A	Reactive Cyanide
1	EPA 150.1	pH

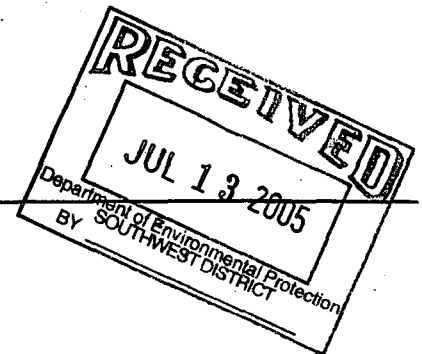


PC&B Environmental Laboratories, Inc.  
210 Park Road  
Oviedo, FL 32765-8801  
PHONE: 407-359-7194  
FAX: 407-359-7197

Report of Analysis  
Volatile Organic Aromatics

CLIENT NAME: Air Spec  
PROJECT NAME: SCPW-2nd Q-2005  
PROJECT NUMBER:  
DATE RECEIVED: 04/29/2005  
ANALYTICAL PROTOCOL: EPA 602 by 8260

Lab Reference Number	205040343-1
Client Sample ID	DISCHARGE
Date/Time Sampled	04/28/2005
Date/Time Extracted	04/29/2005
Date/Time Analyzed	04/29/2005 23:20
Sample Matrix (as Received)	Water
Analysis Confirmed	GCMS
Dilution Factor	1
Result Units	ug/l
Benzene	1.0 U
Chlorobenzene	1.0 U
1,2-Dichlorobenzene	1.0 U
1,3-Dichlorobenzene	1.0 U
1,4-Dichlorobenzene	1.0 U
Ethylbenzene	1.0
MTBE	5.0 U
Toluene	6.4
m & p-Xylenes	3.2
o-Xylene	1.7
(Surr) 1,2-Dichloroethane-d4 (%)	108
(Surr) Toluene-d8 (%)	102
(Surr) 4-Bromofluorobenzene (%)	88



U = Undetected. The value preceeding the 'U' is the RL for the analyte, based on dilution. Results reported on a Wet Weight basis.

NELAP - FDOH Certification # E13239

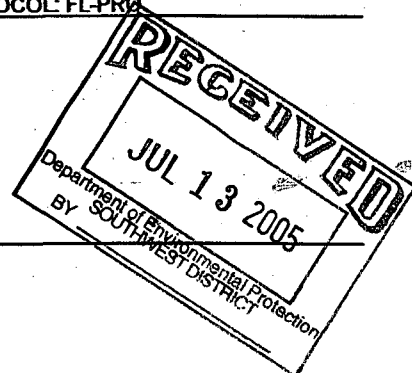
Reviewed by: 

PC&B Environmental Laboratories, Inc.  
210 Park Road  
Oviedo, FL 32765-8801  
PHONE: 407-359-7194  
FAX: 407-359-7197

Report of Analysis  
Petroleum Hydrocarbons

CLIENT NAME: Air Spec  
PROJECT NAME: SCPW-2nd Q-2005  
PROJECT NUMBER:  
DATE RECEIVED: 04/29/2005  
ANALYTICAL PROTOCOL: FL-PR0

Lab Reference Number	205040343-1
Client Sample ID	DISCHARGE
Date/Time Sampled	04/28/2005
Date/Time Extracted	05/02/2005
Date/Time Analyzed	05/03/2005 09:06
Sample Matrix (as Received)	Water
Analysis Confirmed	No
Dilution Factor	1
Result Units	mg/l
Total PHS	50.9
(Surr) C-39 (%)	70
(Surr) OTP (%)	80



U = Undetected. The value preceeding the 'U' is the RL for the analyte, based on dilution. Results reported on a Wet Weight basis.

NELAP- FDOH Certification # E83239

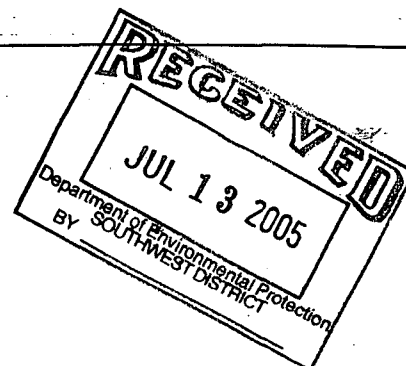
Reviewed by: 

PC&B Environmental Laboratories, Inc.  
210 Park Road  
Oviedo, FL 32765-8801  
PHONE: 407-359-7194

Report of Analysis

CLIENT NAME: Air Spec  
PROJECT NAME: SCPW-2nd Q-2005  
PROJECT NUMBER:  
DATE RECEIVED: 04/29/2005

Lab Reference Number	205040343-1		
Client Sample ID	DISCHARGE		
Date/Time Sampled	04/28/2005		
Sample Matrix (as Received)	Water		
EPA 150.1	pH	Unit	5.52 Q
EPA 9012A	Cyanide, Reactive	mg/kg	0.1 U



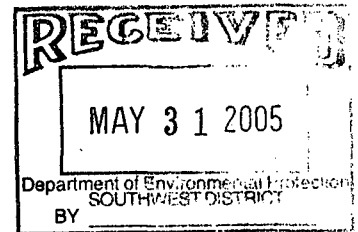
U = Undetected. The value preceeding the 'U' is the RL for the analyte. Results reported on a Wet Weight basis.

NELAP- FDOH Certification # E83239

Reviewed by: 

**Sumter County Public Works Department  
2<sup>nd</sup> Quarter 2005  
Compost, Scrubbable Water Discharge,  
Air Sampling & Testing**

**209 North Florida Avenue  
Bushnell, FL 33513**



**Attention:**

**Mr. Bernard Dew  
And  
Mr. Chuck Jet**

**May 27, 2005**



**Prepared By: Patricia Snowdon  
Senior Environmental Scientist**

1114 W. Dixie Ave  
Leesburg, FL 34748  
Email: info@airspec.org

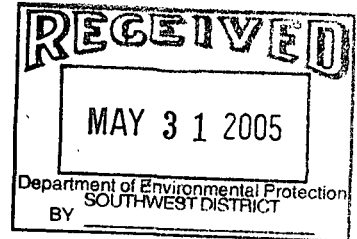


Office - 321-251-6656  
Fax - 321-251-6676  
www.airspec.org

May 27, 2005

Sumter County Solid Waste Facility  
P.O. Box 1066  
Bushnell, FL 33513

Attn: Mr. Chuck Jet



RE: Scrubber Water Discharge & Bio-filter Test Results  
Sumter County Solid Waste Management Facility  
Second Quarter 2005

Dear Mr. Jet,

Air Spec has completed the second quarter air and scrubber water sampling as required by Specific Conditions No. 9D of the composting permit number 126940-010-SO. These samples were taken on April 28, 2005. The air was sampled prior to entering the scrubber, "Before", and at the outlet of the bio-filter, "After". The air samples were tested for BTEX and TRPH. The water sample was obtained from the out flow spicket. The results are attached for your use.

If you should need additional information or have questions concerning the report, please feel free to contact our office.

Very Truly Yours,  
Air Spec

Patricia Snowdon  
Senior Environmental Scientist

Attachments

cc: Mr. Steve Morgan, FDEP Tampa  
Ms. Miriam Zimms, Kessler Consulting



## ANALYTICAL REPORT

Job Number: 660-1606.1

Job Description: Sumter County

For:

Air Spec  
30946 Sealine Drive  
Leesburg, FL 34648

Attention: Ms. Patricia Snowdon



---

Peggy Penner  
Project Manager II  
ppenner@stl-inc.com

05/05/2005

Methods: FDEP

DOH Certification #: E84282

These test results meet all the requirements of NELAP. All questions regarding this test report should be directed to the STL Project Manager who signed this test report. The estimated uncertainty associated with these reported results is available upon request.

Severn Trent Laboratories, Inc.

STL Tampa 6712 Benjamin Road, Suite 100, Tampa, FL 33634

Tel 813-8857427 Fax 813-8857049 [www.stl-inc.com](http://www.stl-inc.com)

## METHOD SUMMARY

Client: Air Spec

Job Number: 660-1606.1

Description	Method	Preparation Method
-------------	--------	--------------------

Matrix: Air - Tedlar		
----------------------	--	--

Volatile Organic Compounds in Air	EPA EPA-18	
-----------------------------------	------------	--

## REFERENCES

EPA - US Environmental Protection Agency

## SAMPLE SUMMARY

Client: Air Spec

Job Number: 660-1606.1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
660-1606-1	AIR-BEFORE SCRUBBER	Air - Tedlar Bag	04/28/2005 1100	04/28/2005 1435
660-1606-2	AIR-AFTER SCRUBBER	Air - Tedlar Bag	04/28/2005 1100	04/28/2005 1435



## SAMPLE RESULTS

## Analytical Data

Client: Air Spec

Job Number: 660-1606.1

Client Sample ID: AIR-BEFORE SCRUBBER

Lab Sample ID: 660-1606-1

Date Sampled: 04/28/2005 1100

Client Matrix: Air - Tedlar

Date Received: 04/28/2005 1435

## EPA-18 Volatile Organic Compounds in Air

Method: EPA-18

Analysis Batch: 660-5830

Instrument ID: VARIAN PID/FID

Preparation: N/A

Lab File ID: 2D28G13.d

Dilution: 1.0

Initial Weight/Volume:

Date Analyzed: 04/29/2005 1033

Final Weight/Volume: 25 mL

Date Prepared: N/A

Injection Volume:

Analyte	Result (mg/m3)	Qualifier	MDL	PQL
Benzene	0.16	U	0.16	1.0
Ethylbenzene	0.24	U	0.24	1.0
Toluene	0.43	I	0.20	1.0
m-Xylene & p-Xylene	0.26	I	0.24	1.0
o-Xylene	0.24	U	0.24	1.0
Methyl tert-butyl ether	0.40	U	0.40	1.0
Total Hydrocarbons	0.80	U	0.80	10

## Analytical Data

Client: Air Spec

Job Number: 660-1606.1

Client Sample ID: AIR-AFTER SCRUBBER

Lab Sample ID: 660-1606-2

Date Sampled: 04/28/2005 1100

Client Matrix: Air - Tedlar

Date Received: 04/28/2005 1435

## EPA-18 Volatile Organic Compounds in Air

Method: EPA-18

Analysis Batch: 660-5830

Instrument ID: VARIAN PID/FID

Preparation: N/A

Lab File ID: 2D28G12.d

Dilution: 1.0

Initial Weight/Volume:

Date Analyzed: 04/29/2005 1003

Final Weight/Volume: 25 mL

Date Prepared: N/A

Injection Volume:

Analyte	Result (mg/m3)	Qualifier	MDL	PQL
Benzene	0.16	U	0.16	1.0
Ethylbenzene	0.24	U	0.24	1.0
Toluene	1.6		0.20	1.0
m-Xylene & p-Xylene	0.24	U	0.24	1.0
o-Xylene	0.24	U	0.24	1.0
Methyl tert-butyl ether	0.40	U	0.40	1.0
Total Hydrocarbons	7.6	I	0.80	10

## DATA REPORTING QUALIFIERS

Client: Air Spec

Job Number: 660-1606.1

Lab Section	Qualifier	Description
Air Toxics	U	Indicates that the compound was analyzed for but not detected.
	I	The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

## QUALITY CONTROL RESULTS

## Quality Control Results

Client: Air Spec

Job Number: 660-1606.1

## QC Association Summary

Lab Sample ID	Client Sample ID	Client Matrix	Method	Prep Batch
<b>Air Toxics</b>				
<b>Analysis Batch:660-5830</b>				
LCS 660-5830/4	Lab Control Spike	Air - Tedlar	EPA-18	
LCSD 660-5830/1	Lab Control Spike Duplicate	Air - Tedlar	EPA-18	
MB 660-5830/5	Method Blank	Air - Tedlar	EPA-18	
660-1606-A-1	AIR-BEFORE SCRUBBER	Air - Tedlar	EPA-18	
660-1606-A-2	AIR-AFTER SCRUBBER	Air - Tedlar	EPA-18	
<b>Analysis Batch:660-5831</b>				
MB 660-5831/3	Method Blank	Air - Tedlar	EPA-18	
660-1606-A-1	AIR-BEFORE SCRUBBER	Air - Tedlar	EPA-18	
660-1606-A-2	AIR-AFTER SCRUBBER	Air - Tedlar	EPA-18	

## Quality Control Results

Client: Air Spec

Job Number: 660-1606.1

## EPA-18 Volatile Organic Compounds in Air

## Method Blank - Batch: 660-5830

Lab ID: MB 660-5830/5

Date Analyzed: 04/29/2005 0131

Dilution: 1.0

Matrix: Air - Tedlar Bag

Units: mg/m3

Analyte	Result	Qualifier	MDL	PQL
Benzene	0.16	U	0.16	1.0
Ethylbenzene	0.24	U	0.24	1.0
Toluene	0.20	U	0.20	1.0
m-Xylene & p-Xylene	0.24	U	0.24	1.0
o-Xylene	0.24	U	0.24	1.0
Methyl tert-butyl ether	0.40	U	0.40	1.0

## Laboratory Control Sample/ Control Duplicate - Batch: 660-5830

LCS Lab ID: LCS 660-5830/4

Date Analyzed: 04/29/2005 1103

Dilution: 1.0

LCSD Lab ID: LCSD 660-5830/1

Date Analyzed: 04/29/2005 0231

Dilution: 1.0

Matrix: Air - Tedlar Bag

Analyte	% Recovery		Recovery Limits	RPD	RPD Limit	Qualifier
	LCS	LCSD				
Benzene	88	92	60 - 140	5	30	
Ethylbenzene	83	94	60 - 140	12	30	
Toluene	92	99	60 - 140	6	30	
o-Xylene	82	100	60 - 140	19	30	

Calculations are performed before rounding to avoid round-off errors in calculated results.

STL Tampa

## Quality Control Results

Client: Air Spec

Job Number: 660-1606.1

## EPA-18 Volatile Organic Compounds in Air

## Method Blank - Batch: 660-5831

Lab ID: MB 660-5831/3

Date Analyzed: 04/29/2005 0131

Dilution: 1.0

Matrix: Air - Tedlar Bag

Units: mg/m3

Analyte	Result	Qualifier	MDL	PQL
Total Hydrocarbons	0.80	U	0.80	10

Calculations are performed before rounding to avoid round-off errors in calculated results.

STL Tampa



Serial Number 13615

## ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

SEVERN  
TRENT

STL

STL Tampa  
6712 Benjamin Road, Suite 100  
Tampa, FL 33634Website: www.stl-inc.com  
Phone: (813) 885-7427  
Fax: (813) 885-7049

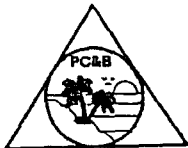
1606

Alternate Laboratory Name/Location

St. Petersburg

Phone:  
Fax:

PROJECT REFERENCE SCPW-20 2005		PROJECT NO.	PROJECT LOCATION (STATE) FL	MATRIX TYPE	REQUIRED ANALYSIS										PAGE 1	OF 1			
SAMPLER'S SIGNATURE <i>[Signature]</i>		P.O. NUMBER	CONTRACT NO.	COMPOSITE (C) OR GAS (G) INDICATE AQUEOUS (WATER) SOLID OR SEMISOLID AIR NONAQUEOUS LIQUID (OIL, SOLVENT, ...)	EPA-18 VOC										STANDARD REPORT DELIVERY				
CLIENT (SITE) PM N		CLIENT PHONE 352 636 0704	CLIENT FAX												DATE DUE				
CLIENT NAME AirSpec		CLIENT E-MAIL Patricia.Snowdon@AirSpec.com													EXPEDITED REPORT DELIVERY (SURCHARGE)				
CLIENT ADDRESS 1114 W. DIXIE AVE, Leesburg, FL 34748															DATE DUE				
COMPANY CONTRACTING THIS WORK (if applicable)															NUMBER OF COOLERS SUBM PER SHIPMENT:				
SAMPLE		SAMPLE IDENTIFICATION			NUMBER OF CONTAINERS SUBMITTED										REMARKS				
DATE	TIME																		
4/28/05	11:00	Air - Before Scrubber															X-Tra Bag		
		1100 Air - After Scrubber															For each Sa		
																	Point		
																	In Case of		
																	IS Damage		
RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME
<i>[Signature]</i>		4/28/05	235	<i>[Signature]</i>				<i>[Signature]</i>				<i>[Signature]</i>				<i>[Signature]</i>			
RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME
<i>[Signature]</i>		4-28-05	1435	<i>[Signature]</i>				<i>[Signature]</i>				<i>[Signature]</i>				<i>[Signature]</i>			
LABORATORY USE ONLY																			
RECEIVED FOR LABORATORY BY: (SIGNATURE)		DATE	TIME	CUSTODY INTACT YES <input type="radio"/> NO <input type="radio"/>		CUSTODY SEAL NO.		STL TAMPA LOG NO.		LABORATORY REMARKS									
<i>[Signature]</i>		4-28-05	1435					1606											



## PC&B Environmental Laboratories, Inc.

210 Park Road, Oviedo, Florida 32765  
Phone: 407-359-7194 Fax: 407-359-7197

DISCharge  
20-2005  
SCPW

05-18-2005

Patricia Snowdon  
Air Spec  
1114 W. Dixie Ave  
Leesburg, FL 34748-

Dear Patricia Snowdon:

Enclosed are the results of the analysis of your samples received 04/29/2005.

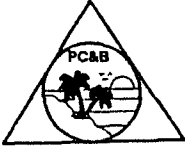
Our laboratory is NELAP certified by the Florida DOH (Lab #E83239) and operates under an NELAP approved Quality Assurance Plan. Unless otherwise noted, all results are reported as received. All data were determined in accordance with published procedures (EPA-600/4-79-020), Methods for Chemical Analysis of Water and Wastes, Revised March 1983, or later and/or Standard Methods for the examination of Water and Wastewater, 20th Edition 1999, or later and/or Test Methods for Evaluating Solid Waste (EPA-SW-846, Revised January 1995, or later), unless stated otherwise in our ComQapp under method modifications.

Test results meet all of the requirements of the NELAC Standards.

If you have any questions, please do not hesitate to give me a call.

Sincerely,

  
W. Judson Rogers III  
Quality Assurance Officer



# PC&B Environmental Laboratories, Inc.

210 Park Road, Oviedo, Florida 32765  
Phone: 407-359-7194 Fax: 407-359-7197

Client : Air Spec  
1114 W. Dixie Ave  
Leesburg, FL 34748-

Contact : Patricia Snowdon  
Phone : (352) 636-0704

**Laboratory Reference Number : 205040343**

Project Name : SCPW-2nd Q-2005

Project Number :

Chain of Custody :

Sample temperature at time of receipt: 2 degrees C

Laboratory ID	Matrix	Client ID	Status	Date/Time Sampled
205040343-1	Water	DISCHARGE	RUN	04/28/2005

Number	Parameter	Description
1	FL-PRO	Petroleum Hydrocarbons
1	EPA 602 by 8260	Volatile Organic Aromatics
1	EPA 9012A	Reactive Cyanide
1	EPA 150.1	pH

# PC&B Environmental Laboratories, Inc.

210 Park Road  
Oviedo, FL 32765-8801  
407-359-7194 - (FAX) 407-359-7197

## Case Narrative

Patricia Snowdon  
Air Spec  
1114 W. Dixie Ave  
Leesburg, FL 34748-

CASE NARRATIVE for Work Order: 205040343  
Project Number:  
Project Name: SCPW-2nd Q-2005

This Case Narrative is a summary of events and/or problems encountered with this Work Order.

For samples requesting EPA 602 analysis, the GCMS method EPA 8260 was substituted in order to generate the highest quality data possible at no additional cost.

### Definition of Flags

A	=	Value reported is an average of 2 or more determinations
DL	=	No surrogate result due to dilution or matrix interference.
H	=	Value based on field kit determination, results may not be accurate
I	=	The reported value is between MDL and PQL
J	=	Estimated Value, value not accurate.
J1	=	Estimated value surrogate limits have been exceeded
J4	=	Estimated value matrix interference
K	=	Off scale low
L	=	Off-scale high. Actual value is greater than value given. Above calibration curve.
M	=	Presence of material is verified but not quantified. Should be lab PQL
N	=	Presumptive evidence of presence of material
Q	=	Sample analyzed beyond the accepted holding time.
T	=	Value less than the lab MDL
T2	=	Analysis from an unpreserved or improperly preserved sample
V	=	Analyte was both detected in the method blank and sample.
Y	=	Analysis from an unpreserved or improperly preserved sample

PC&B Environmental Laboratories, Inc.  
210 Park Road  
Oviedo, FL 32765-8801  
PHONE: 407-359-7194  
FAX: 407-359-7197

Report of Analysis  
Volatile Organic Aromatics

CLIENT NAME: Air Spec  
PROJECT NAME: SCPW-2nd Q-2005  
PROJECT NUMBER:  
DATE RECEIVED: 04/29/2005  
ANALYTICAL PROTOCOL: EPA 602 by 8260

Lab Reference Number	205040343-1
Client Sample ID	DISCHARGE
Date/Time Sampled	04/28/2005
Date/Time Extracted	04/29/2005
Date/Time Analyzed	04/29/2005 23:20
Sample Matrix (as Received)	Water
Analysis Confirmed	GCMS
Dilution Factor	1
Result Units	ug/l
Benzene	1.0 U
Chlorobenzene	1.0 U
1,2-Dichlorobenzene	1.0 U
1,3-Dichlorobenzene	1.0 U
1,4-Dichlorobenzene	1.0 U
Ethylbenzene	1.0
MTBE	5.0 U
Toluene	6.4
m & p-Xylenes	3.2
o-Xylene	1.7
(Surr) 1,2-Dichloroethane-d4 (%)	108
(Surr) Toluene-d8 (%)	102
(Surr) 4-Bromofluorobenzene (%)	88

U = Undetected. The value preceeding the 'U' is the RL for the analyte, based on dilution. Results reported on a Wet Weight basis.

NELAP- FDOH Certification # E83239

Reviewed by : 

# Quality Control Report for Spike/Spike Duplicate Analysis

## Aromatic Volatile Organics

Matrix: Water

Lab Sample ID: MW-MS

QC Batch ID: 200504MS1060

Spike Units: ug/l

Analysis Date: 04/29/2005

Preparation Date: 04/29/2005

Method: EPA 624

Analyst: KN

Analyte	Spike Amount	Sample Result	Spike Result	Spike Percent Recovery	MSD Result	MSD Percent Recovery	RPD
Benzene	50.0	0.0	57.0	114	57.0	114	0
Ethylbenzene	50.0	0.0	49.0	98	51.0	102	4
MTBE	50.0	0.0	47.0	94	46.0	92	2
Toluene	50.0	0.0	58.0	116	58.0	116	0
m & p-Xylenes	100.0	0.0	102.0	102	105.0	105	3
o-Xylene	50.0	0.0	50.0	100	53.0	106	6

### Quality Control Limits

Analyte	Lower Limit	Upper Limit	RPD
Benzene	46	145	17
Ethylbenzene	70	127	10
MTBE	51	149	16
Toluene	56	136	14
m & p-Xylenes	67	130	11
o-Xylene	57	132	13

PC&B Environmental Laboratories, Inc.  
210 Park Road  
Oviedo, FL 32765-8801  
PHONE: 407-359-7194  
FAX: 407-359-7197

Report of Analysis  
Petroleum Hydrocarbons

CLIENT NAME: Air Spec  
PROJECT NAME: SCPW-2nd Q-2005  
PROJECT NUMBER:  
DATE RECEIVED: 04/29/2005  
ANALYTICAL PROTOCOL: FL-PRO

Lab Reference Number	205040343-1
Client Sample ID	DISCHARGE
Date/Time Sampled	04/28/2005
Date/Time Extracted	05/02/2005
Date/Time Analyzed	05/03/2005 09:06
Sample Matrix (as Received)	Water
Analysis Confirmed	No
Dilution Factor	1
Result Units	mg/l

---

Total PHS	50.9
(Surr) C-39 (%)	70
(Surr) OTP (%)	80

U = Undetected. The value preceeding the 'U' is the RL for the analyte, based on dilution. Results reported on a Wet Weight basis.

NELAP- FDOH Certification # E83239

Reviewed by : 

# Quality Control Report for LCS Analysis

## Petroleum Hydrocarbons

Matrix: Water

Lab Sample ID: LCS

QC Batch ID: 200505FLRO005

LCS Units: mg/l

Analysis Date: 05/03/2005

Preparation Date: 05/02/2005

Method: FL-PRO

Analyst: TT

Analyte	LCS Conc	LCS Result	Percent Recovery	Lower Control Limit	Upper Control Limit
(Surr) C-39	100.0	86.0	86	42	193
(Surr) OTP	100.0	97.0	97	82	142
Total PHS	50.0	54.0	108	55	118



PC&B Environmental Laboratories, Inc.  
210 Park Road  
Oviedo, FL 32765-8801  
PHONE: 407-359-7194

Report of Analysis

CLIENT NAME: Air Spec  
PROJECT NAME: SCPW-2nd Q-2005  
PROJECT NUMBER:  
DATE RECEIVED: 04/29/2005

Lab Reference Number	205040343-1			
Client Sample ID	DISCHARGE			
Date/Time Sampled	04/28/2005			
Sample Matrix (as Received)	Water			
EPA 150.1	pH	Unit	5.52	Q
EPA 9012A	Cyanide, Reactive	mg/kg	0.1	U

U = Undetected. The value preceeding the 'U' is the RL for the analyte. Results reported on a Wet Weight basis.

NELAP- FDOH Certification # E83239

Reviewed by : 

# PC&B Environmental

210 Park Road, Oviedo, FL 32765  
407-359-7194 (FAX) 407-359-7197

## Chain of Custody

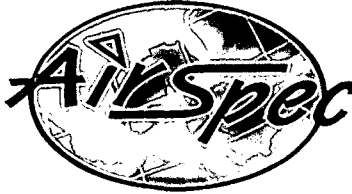
Work Order: 205040343

Date: 4/28/05 Page 1 of 1

COMPANY: Air Spec			ANALYSIS REQUESTED										Number of Containers
ADDRESS: 1114 W. DIXIE AVE Leesburg, FL 34748													
SAMPLED BY: Patricia Snowden <i>tsk</i>													
PHONE: 352 636 0704 FAX:													
			PRESERVATION										
#	SAMPLE ID	DATE/TIME	MATRIX										
			AIR	WATER	SLUDGE	SOIL/SOLID	ORG. LIQUID						
1	Discharge	4/28/05	X					X	X	X	X		
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													

RELINQUISHED BY		DATE/TIME	RECEIVED BY		DATE/TIME	PROJECT INFORMATION		SAMPLE RECEIPT	
1:			2: <i>Sam Hwang</i>		10:45	PROJECT NAME: SCPW-2nd Q-2005		Total # of Containers	
2:			3:			PROJECT #:		Chain of Custody Seals	
3:						SITE ADDRESS: Bushnell, FL		Recv'd in Good Condition	
SPECIAL INSTRUCTIONS/COMMENTS:  RUSH						PROJECT MANAGER:		PO #:	
						INVOICE TO: (IF DIFFERENT FROM ABOVE)			
QUOTE/CONTRACT #:									

1114 W. Dixie Ave  
Leesburg, FL 34748  
Email: info@airspec.org



Office - 321-251-6656  
Fax - 321-251-6676  
www.airspec.org

May 27, 2005

Leesburg

Sumter County Solid Waste Facility  
P.O.Box 1066  
Bushnell, FL 33513  
Attn: Mr. Tommy Hurst

RE: Second Quarter 2005 Compost Sampling and Testing Results  
Sumter County Solid Waste Facility  
Permit No.126940-010-SO

Dear Sir:

Air Spec has received the results of the 2005 second quarter sampling, testing and classification for the compost produced at the above referenced facility. A composite compost sample was collected for the purpose of analysis and classification on April 28, 2005 at the facility as required in 7-R through 8A, 1-5. The samples were analyzed and classified in accordance with the Florida Administrative Code (FAC) Chapter 62-709, Criteria for the Production and Use of Compost Made from Solid Waste and specific condition 7.8 of your permit.

A **raw feed stock, raw and finished compost** sample was obtained and based on the attached results, currently the compost is classified as **Type A** as described in 62-709.600, Criteria for the Use of Compost, states compost classified as Type A has unrestricted use by commercial, agricultural, institutional or governmental operations.

We hope that the provided information meets your needs at the present time. Should you have any questions or require additional information, please contact our office or cell phone.

Very Truly Yours,  
Air Spec

Patricia Snowdon  
Senior Environmental Scientist

Attachments cc: Mr. Steve Morgan of FDEP, Mr. Chuck Jett, Sumter County Solid Waste and  
Ms. Miriam Zimms, Kessler Consulting



Environmental Services



COPY  
2Q-2005  
SCPWFlorida Certified and  
NELAP AccreditedTHORNTON LABORATORIES, INC.  
MARINE, ANALYTICAL AND ENVIRONMENTAL SERVICES1145 EAST CASS STREET, TAMPA, FLORIDA 33602  
P.O. BOX 2880, TAMPA, FLORIDA 33601-2880  
WWW.THORNTONLAB.COM  
FL DOM # EB4100TELEPHONE (813) 223-8702  
FAX (813) 223-83329-May-2005  
Page 1 of 1

## Report For:

Airspec  
1114 W. Dixie Ave.  
Leesburg, FL 34748

## Sample Identification:

Compost - SCPW - 2nd Q-2005      Attn: Patricia Snowden  
Id: Raw Feed Stock, Bushnell Pl.  
Sampled on 04/28/05

Date Received: 28-Apr-2005

Laboratory Number: 258531A

CERTIFICATE OF ANALYSIS  
Test results meet all requirements of NELAP

Method	Parameter	Result	Units	Analysis Date	Analyst
EPA 160.3	Moisture, 105 °C	17.9	%	2-May-2005	Austin Duffee
ANALYSIS ON DRY BASIS					
EPA 160.4	Organic Matter (550 °C)	94.4	%	5-May-2005	Devinder Nanda
	Reduction in Organic Matter	84.1	%	9-May-2005	Sandy Duffee

THORNTON LABORATORIES, INC.  
Lovie Hudson  
Project Manager



THORNTON LABORATORIES, INC.  
MARINE, ANALYTICAL AND ENVIRONMENTAL SERVICES

1145 EAST CASS STREET, TAMPA, FLORIDA 33602  
P.O. BOX 2880, TAMPA, FLORIDA 33601-2880  
WWW.THORNTONLAB.COM  
FL DOH # E94100

TELEPHONE (813) 223-8702  
FAX (813) 223-8332

10-May-2005  
Page 2 of 2

Report For:

Airepco  
1114 W. Dixie Ave.  
Leesburg, FL 34748

Sample Identification:

Compost - 8CPW - 2nd Q-2005      Attn: Patricia Snowden  
Id: Raw Compost, Bushnell Fl.  
Sampled on 04/28/05

Date Received: 28-Apr-2005

Laboratory Number: 250532A

CERTIFICATE OF ANALYSIS  
Test results meet all requirements of NELAP

Method	Parameter	Result	Units	Analysis Date	Analyst
EPA 7741	Selenium (Se)	< 0.25	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7061	Arsenic (As)	1.1	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7471	Mercury (Hg)	0.010	mg/Kg	5-May-2005	Sandy Lundgren
SM9221E	Fecal Coliform (MPN)/gm. Dry Weight	** 730		3-May-2005	Sandy Duffee
	Date and time started	0503 1045		3-May-2005	DAN SHARP

\* Value was rechecked.

\*\* Average of multiple determinations.

THORNTON LABORATORIES, INC.  
Lovie Hudson  
Project Manager



**THORNTON LABORATORIES, INC.**  
MARINE, ANALYTICAL AND ENVIRONMENTAL SERVICES

1145 EAST CASS STREET, TAMPA, FLORIDA 33602  
P.O. BOX 2880, TAMPA, FLORIDA 33601-2880  
WWW.THORNTONLAB.COM  
FL DCM # E84100

TELEPHONE (813) 223-9702  
FAX (813) 223-8332

10-May-2005

Page 1 of 2

Report For:

Airspec  
1114 W. Dixie Ave.  
Leesburg, FL 34748

Sample Identification:

Compost - SCPW - 2nd Q-2005      Attn: Patricia Snowden  
Id: Raw Compost, Bushnell Fl.  
Sampled on 04/28/05

Date Received: 28-Apr-2005

Laboratory Number: 258532A

**CERTIFICATE OF ANALYSIS**  
Test results meet all requirements of NELAP

Method	Parameter	Result	Units	Analysis Date	Analyst
EPA 160.3	Moisture, 105 °C	50.6	%	2-May-2005	Austin Duffee
EPA 9045	pH, noncalcareous soils(1:3)	6.6		3-May-2005	Sandy Duffee
ANALYSIS ON DRY BASIS					
EPA 160.4	Organic Matter (550 C)	66.0	%	5-May-2005	Devinder Nanda
EPA/CE-81-1	Total Nitrogen (N)	* 12100	mg/Kg	10-May-2005	Joseph Fishbach
	Phosphorus, Total (P)	* 11600	mg/Kg	10-May-2005	Sandy Duffee
EPA 7610	Potassium (K)	* 13800	mg/Kg	10-May-2005	Sandy Lundgren
EPA 7130	Cadmium (Cd)	0.5	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7210	Copper (Cu)	65	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7420	Lead (Pb)	37	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7520	Nickel (Ni)	11	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7950	Zinc (Zn)	347	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7480	Molybdenum (Mo)	< 8	mg/Kg	5-May-2005	Sandy Lundgren

\* Value was rechecked.

\*\* Average of multiple determinations.



# THORNTON LABORATORIES, INC.

MARINE, ANALYTICAL AND ENVIRONMENTAL SERVICES

1145 EAST CASS STREET, TAMPA, FLORIDA 33602  
P.O. BOX 2680, TAMPA, FLORIDA 33601-2680  
WWW.THORNTONLAB.COM  
FL DOH # E84100

TELEPHONE (813) 223-9702  
FAX (813) 223-9332

10-May-2005

Page 1 of 2

Report For:

Airspec  
1114 W. Dixie Ave.  
Leesburg, FL 34748

Sample Identification:

Compost - SCPW - 2nd Q-2005      Attn: Patricia Snowden  
Id: Finished Compost, Bushnell FL.  
Sampled on 04/28/05

Date Received: 26-Apr-2005

Laboratory Number: 258533

CERTIFICATE OF ANALYSIS  
Test results meet all requirements of NELAP

Method	Parameter	Result	Units	Analysis Date	Analyst
EPA 160.3	Moisture, 105 °C	55.8	%	2-May-2005	Austin Duffee
EPA 9045	pH, noncalcereous soils(1:3)	7.0		3-May-2005	Sandy Duffee
ANALYSIS ON DRY BASIS					
EPA 160.4	Organic Matter (550 °C)	72.8	%	5-May-2005	Devinder Nanda
EPA/CE-81-1	Total Nitrogen (N)	* 10700	mg/Kg	10-May-2005	Joseph Fishbach
	Phosphorus, Total (P)	* 3420	mg/Kg	10-May-2005	Sandy Duffee
EPA 7610	Potassium (K)	* 2500	mg/Kg	10-May-2005	Sandy Lundgren
EPA 7130	Cadmium (Cd)	0.5	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7210	Copper (Cu)	93	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7420	Lead (Pb)	49	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7520	Nickel (Ni)	14	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7950	Zinc (Zn)	288	mg/Kg	5-May-2005	Sandy Lundgren

\* Value was rechecked.

\*\* Average of multiple determinations.



Florida Certified and  
NELAP Accredited

**THORNTON LABORATORIES, INC.**  
MARINE, ANALYTICAL AND ENVIRONMENTAL SERVICES

1145 EAST CASS STREET, TAMPA, FLORIDA 33602  
P.O. BOX 2880, TAMPA, FLORIDA 33601-2880  
WWW.THORNTONLAB.COM  
FL DOH # E84100

TELEPHONE (813) 223-9702  
FAX (813) 223-9332

10-May-2005

Page 2 of 2

Report For:

Airspec  
1114 W. Dixie Ave.  
Leesburg, Fl. 34748

Sample Identification:

Compost - 6CPN - 2nd Q-2005      Attn: Patricia Snowden  
Id: Finished Compost, Buahnell Fl.  
Sampled on 04/28/05

Date Received:      28-Apr-2005

Laboratory Number:      258533

**CERTIFICATE OF ANALYSIS**  
Test results meet all requirements of NELAP

Method	Parameter	Result	Units	Analysis Date	Analyst
EPA 7480	Molybdenum (Mo)	< 8	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7742	Selenium (Se)	< 0.25	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7061	Arsenic (As)	1.5	mg/Kg	5-May-2005	Sandy Lundgren
EPA 7472	Mercury (Hg)	0.17	mg/Kg	5-May-2005	Sandy Lundgren
SM9221E	Fecal Coliform (MPN)/gm. Dry Weight	** 27700		3-May-2005	Sandy Duffee
	Date and time started	0503 1045		3-May-2005	DAN SHARP

\* Value was rechecked.

\*\* Average of multiple determinations.

THORNTON LABORATORIES, INC.  
Lovie Hudson  
Project Manager



1114 W. Dixie Ave  
Leesburg, FL 34748  
Email: info@airspec.org



Office - 321-251-6656  
Fax - 321-251-6676  
www.airspec.org

April 28, 2005

Sumter County Solid Waste Facility  
P.O. Box 1066  
Bushnell, FL 33513

**Foreign Matter Content of Compost Made From Solid Waste  
(Procedure per 62-709.530(f))**

Date Sample Collected: 4-28-2005  
Date Tested: 4-28-2005

Sampled by: Patricia Snowden, Senior Environmental Scientist

Total Dry Sample Weight	1038.02g
Less No. 1 Tare Weight	- 5.4g
Net Dry Sample Weight	1032.62 g

Total Dry Inorganic Weight	372.20g
Less Tare Weight	- 5.4g
Net Dry Inorganic Weight	366.8 g

---

Foreign Matter Content:	Total Weight	0	Percent	0%
Consisting of:				
Glass		0		0 %
Metal		0		0 %

(Wt Separated Divided By Wt Total)

**Formula:**

Foreign Matter Content  
----- X 100 = % Foreign Matter  
Total Dry Sample Weight

Indoor Air Quality



1  
Environmental Services



Industrial Hygiene

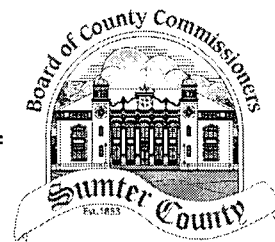


**1114 W. Dixie Ave. ~ Leesburg, FL 34748**  
**Office - 321-251-6656 ~ Fax - 321-251-6676**  
**Email: [info@airspec.org](mailto:info@airspec.org) ~ Web: [www.airspec.org](http://www.airspec.org)**

# SUMTER COUNTY SOLID WASTE

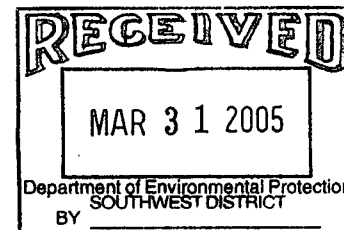
SUMTER COUNTY, FLORIDA

PO Box 1066 • Bushnell, FL 33513 • Phone (352) 793-3368 • Fax (352) 568-0166 • www.scpw.org



March 29, 2005

Mr. Steve Morgan  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318



Dear Mr. Morgan:

As a follow-up to the letter sent to you by Bernard Dew, County Administrator on February 7, 2005; I am requesting for the second time, a meeting with D.E.P. to discuss sludge and other permit issues affecting the daily operations of the Solid Waste Facility as soon as possible.

It would be helpful to have several dates to choose from, as this meeting will involve Ms. Susan Pelz, Ms. Francine Joyal, yourself, several county employees and consultants. This will allow all involved to review their schedules and hopefully select a date that will be accommodating to all.

The county will briefly highlight the direction we were recently given by our Board of County Commissioners (BOCC) based on the growing population of the County and the impacts to our solid waste, recycling and composting facility. Once closure is brought to the first meeting requested in this letter, Sumter County will be approaching you for a second time to discuss in further detail some larger changes expected to occur at our facility in the near future; in order for staff/consultants to properly prepare an action plan for these future changes to meet the BOCC direction.

As this is our second request for a meeting, I respectfully request a reply to Sumter County as soon as possible.

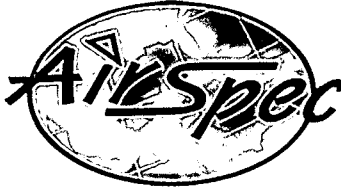
Respectfully,

Chuck Jett,  
Solid Waste Superintendent

CJ/sp

Cc: Bernard Dew/Tina Chavez (Sumter BOCC Admin)  
Tommy Hurst/Denise Warnock (Sumter PW)  
Francine Joyal (FORCE)  
Susan Pelz (DEP)  
Miriam Zimms (KCI)

1114 W. Dixie Ave  
Leesburg, FL 34748  
Email: info@airspec.org



Office - 321-251-6656  
Fax - 321-251-6676  
www.airspec.org

March 14, 2005

Sumter County Solid Waste Facility  
P.O. Box 1066  
Bushnell, FL 33513

Attn: Mr. Chuck Jet

RE: Scrubber & Bio-filter Test Results  
Sumter County Solid Waste Management Facility  
First Quarter 2005

*Rec'd 3/15/05  
DN*

Dear Mr. Jet,

Air Spec has completed the first quarter air and scrubber water sampling as required by Specific Conditions No. 9D of the composting permit number 126940-010-SO. These samples were taken on March 2, 2005. The air was sampled prior to entering the scrubber, "A1", and at the outlet of the bio-filter, "A2". The air samples were tested for BTEX and TRPH. The water sample was obtained from the out flow spicket. The results are attached for your use.

If you should need additional information or have questions concerning the report, please feel free to contact our office.

Very Truly Yours,  
Air Spec

Patricia Snowdon  
Senior Environmental Scientist

Attachments

cc: Mr. Steve Morgan, FDEP Tampa  
Ms. Miriam Zimms, Kessler Consulting



## ANALYTICAL REPORT

Job Number: 660-483.1

Job Description: Sumter County P.W.

For:

Air Spec  
30946 Sealine Drive  
Leesburg, FL 34648

Attention: Patricia Snowden

---

Mike Valder  
Project Manager II  
mvalder@stl-inc.com

03/14/2005

Methods: FDEP

DOH Certification #: E84282

These test results meet all the requirements of NELAC. All questions regarding this test report should be directed to the STL Project Manager who signed this test report. The estimated uncertainty associated with these reported results is available upon request.

**Severn Trent Laboratories, Inc.**

STL Tampa 6712 Benjamin Road, Suite 100, Tampa, FL 33634

Tel 813-8857427 Fax 813-8857049 [www.stl-inc.com](http://www.stl-inc.com)

## METHOD SUMMARY

Client: Air Spec

Job Number: 660-483.1

Job Description: Sumter County P.W.

Description	Method	Preparation Method
Matrix: Water		
Volatile Organic Compounds by GC/MS Purge-and-Trap	SW846 8260B	SW846 5030E
Florida Method for Determination of Petroleum Range Organics by GC/FID Continuous Liquid-Liquid Extraction	FL-DEP FL-PRO	SW846 3520C

## REFERENCES

FL-DEP - State Of Florida Department Of Environmental Protection, Florida Administrative Code.

SW846 - "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

## SAMPLE SUMMARY

Client: Air Spec

Job Number: 660-483.1

Job Description: Sumter County P.W.

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
660-483-1	DISCHARGE	Water	03/02/2005 1445	03/03/2005 0845
660-483-2	TRIP BLANK	Water	03/02/2005 1445	03/03/2005 0845

Preliminary Data

**SAMPLE RESULTS**

Preliminary Data



**Analytical Data**

Client: Air Spec

Job Number: 660-483.1

**Client Sample ID: DISCHARGE**

Lab Sample ID: 660-483-1

Date Sampled: 03/02/2005 1445

Client Matrix: Water

Date Received: 03/03/2005 0845

**8260B Volatile Organic Compounds by GC/MS**

Method: 8260B

Analysis Batch: 660-2647

Instrument ID: BVMG GC/MS

Preparation: 5030B

Lab File ID: 1GC1047.D

Dilution: 1.0

Initial Weight/Volume: 5 mL

Date Analyzed: 03/11/2005 0625

Final Weight/Volume: 5 mL

Date Prepared: N/A

Analyte	Result (ug/L)	Qualifier	MDL	PQL
Benzene	0.27	U	0.27	1.0
Ethylbenzene	11		0.83	1.0
Toluene	73		0.51	1.0
Xylenes, Total	42		0.98	1.0
Methyl tert-butyl ether	0.88	U	0.88	1.0
m-Xylene & p-Xylene	31		0.74	1.0
o-Xylene	11		0.78	1.0
Surrogate	%Rec	Qualifier	Acceptance Limits	
Toluene-d8	106		77 - 122	
Dibromofluoromethane	108		70 - 130	
4-Bromofluorobenzene	97		74 - 126	

**Analytical Data**

Client: Air Spec

Job Number: 660-483.1

Client Sample ID: TRIP BLANK

Lab Sample ID: 660-483-2

Client Matrix: Water

Date Sampled: 03/02/2005 1445

Date Received: 03/03/2005 0845

**8260B Volatile Organic Compounds by GC/MS**

Method: 8260B

Analysis Batch: 660-2647

Instrument ID: BVMG GC/MS

Preparation: 5030B

Lab File ID: 1GC1030.D

Dilution: 1.0

Initial Weight/Volume: 5 mL

Date Analyzed: 03/10/2005 2338

Final Weight/Volume: 5 mL

Date Prepared: N/A

Analyte	Result (ug/L)	Qualifier	MDL	PQL
Benzene	0.27	U	0.27	1.0
Ethylbenzene	0.83	U	0.83	1.0
Toluene	0.51	U	0.51	1.0
Xylenes, Total	0.98	U	0.98	1.0
Methyl tert-butyl ether	0.88	U	0.88	1.0
m-Xylene & p-Xylene	0.74	U	0.74	1.0
o-Xylene	0.78	U	0.78	1.0
Surrogate	%Rec	Qualifier	Acceptance Limits	
Toluene-d8	98		77 - 122	
Dibromofluoromethane	96		70 - 130	
4-Bromofluorobenzene	90		74 - 126	

STL Tampa

**Analytical Data**

Client: Air Spec

Job Number: 660-483.1

**Client Sample ID: DISCHARGE**

Lab Sample ID: 660-483-1

Date Sampled: 03/02/2005 1445

Client Matrix: Water

Date Received: 03/03/2005 0845

**FL-PRO Florida Method for Determination of Petroleum Range Organics by GC/FID**

Method: FL-PRO Analysis Batch: 660-2741  
Preparation: 3520C Prep Batch: 660-2480  
Dilution: 5.0  
Date Analyzed: 03/11/2005 1141  
Date Prepared: 03/08/2005 1630

Instrument ID: HP 5890 FID  
Lab File ID: 1C11M010.D  
Initial Weight/Volume: 930 mL  
Final Weight/Volume: 2 mL  
Injection Volume:  
Column ID: PRIMARY

Analyte	Result (mg/L)	Qualifier	MDL	PQL
FL PRO	35		0.54	1.6
Surrogate	%Rec	Qualifier	Acceptance Limits	
n-C39	0		24 - 137	
o-Terphenyl	0		38 - 156	

STL Tampa

## DATA REPORTING QUALIFIERS

Client: Air Spec

Job Number: 660-483.1

Lab Section	Qualifier	Description
GC/MS VOA	U	Indicates that the compound was analyzed for but not detected.
GC Semi VOA	U	Indicates that the compound was analyzed for but not detected.

Preliminary Data

STL Tampa

## QUALITY CONTROL RESULTS

Preliminary Data

## Quality Control Results

Client: Air Spec

Job Number: 660-483.1

Job Description: Sumter County P.W.

### QC Association Summary

Lab Sample ID	Client Sample ID	Client Matrix	Method	Prep Batch
<b>GC/MS VOA</b>				
<b>Analysis Batch:660-2647</b>				
LCS 660-2647/1	Lab Control Spike	Water	8260B	
LCSD 660-2647/2	Lab Control Spike Duplicate	Water	8260B	
MB 660-2647/3	Method Blank	Water	8260B	
660-483-J-1	DISCHARGE	Water	8260B	
660-483-C-2	TRIP BLANK	Water	8260B	
660-527-A-1 MS	Matrix Spike	Water	8260B	
660-527-A-1 MSD	Matrix Spike Duplicate	Water	8260B	
<b>GC Semi VOA</b>				
<b>Prep Batch: 660-2480</b>				
LCS 660-2480/2-A	Lab Control Spike	Water	3520C	
LCSD 660-2480/3-A	Lab Control Spike Duplicate	Water	3520C	
MB 660-2480/1-A	Method Blank	Water	3520C	
660-483-A-1-A	DISCHARGE	Water	3520C	
<b>Analysis Batch:660-2741</b>				
LCS 660-2480/2-A	Lab Control Spike	Water	FL-PRO	660-2480
LCSD 660-2480/3-A	Lab Control Spike Duplicate	Water	FL-PRO	660-2480
MB 660-2480/1-A	Method Blank	Water	FL-PRO	660-2480
660-483-A-1-A	DISCHARGE	Water	FL-PRO	660-2480

STL Tampa

## Quality Control Results

Client: Air Spec

Job Number: 660-483.1

Job Description: Sumter County P.W.

### Surrogate Recovery Report

#### 8260B Volatile Organic Compounds by GC/MS

<u>Client Sample ID</u>	<u>Lab Sample ID</u>	(BFB) (%Rec)	(TOL) (%Rec)	Dibromo fluorom ethane
DISCHARGE	660-483-1	97	106	108
LCS	LCS 660-2647/1	91	102	101
LCSD	LCSD 660-2647/2	84	95	97
MB	MB 660-2647/3	101	105	107
-MS	660-527-A-1 MS-MS	98	105	111
-MSD	660-527-A-1 MSD-	84	95	92
TRIP BLANK	660-483-2	90	98	96

#### Surrogate

#### Acceptance Limits

(BFB)	4-Bromofluorobenzene	74 - 126
(TOL)	Toluene-d8	77 - 122
Dibromofluor	Dibromofluoromethane	70 - 130

STL Tampa

## Quality Control Results

Client: Air Spec

Job Number: 660-483.1

Job Description: Sumter County P.W.

### Surrogate Recovery Report

#### FL-PRO Florida Method for Determination of Petroleum Range Organics by GC/FID

<u>Client Sample ID</u>	<u>Lab Sample ID</u>	n-C39	o-Terphenyl
DISCHARGE	660-483-1	0	0
LCS	LCS 660-2480/2-A	115	108
LCSD	LCSD 660-2480/3-A	114	106
MB	MB 660-2480/1-A	108	108

Surrogate

Acceptance Limits

STL Tampa



## Quality Control Results

Client: Air Spec

Job Number: 660-483.1

### 8260B Volatile Organic Compounds by GC/MS

#### Method Blank - Batch: 660-2647

Lab ID: MB 660-2647/3

Date Analyzed: 03/10/2005 2314

Dilution: 1.0

Matrix: Water

Units: ug/L

Analyte	Result	Qualifier	MDL	RQL
Benzene	0.27	U	0.27	1.0
Ethylbenzene	0.83	U	0.83	1.0
Toluene	0.51	U	0.51	1.0
Xylenes, Total	0.98	U	0.98	1.0
Methyl tert-butyl ether	0.88	U	0.88	1.0
m-Xylene & p-Xylene	0.74	U	0.74	1.0
o-Xylene	0.78	U	0.78	1.0

#### Laboratory Control Sample/ Control Duplicate - Batch: 660-2647

LCS Lab ID: LCS 660-2647/1

Date Analyzed: 03/10/2005 2201

Dilution: 1.0

LCSD Lab ID: LCSD 660-2647/2

Date Analyzed: 03/10/2005 2225

Dilution: 1.0

Matrix: Water

Units: ug/L

Analyte	% Recovery		Recovery Limits	RPD	RPD Limit	Qualifier
	LCS	LCSD				
Benzene	112	103	62 - 135	9	37	
Toluene	97	93	68 - 131	5	33	

#### Matrix Spike/Spike Duplicate - Batch: 660-2647

MS Lab ID: 660-527-A-1 MS

Date Analyzed: 03/11/2005 0537

Dilution: 1.0

MSD Lab ID: 660-527-A-1 MSD

Date Analyzed: 03/11/2005 0601

Dilution: 1.0

Matrix: Water

Units: ug/L

Analyte	% Recovery		% Recovery Limits	RPD	RPD Limit	Qualifier
	MS	MSD				
Benzene	109	98	62 - 135	11	37	
Toluene	97	99	68 - 131	2	33	

Calculations are performed before rounding to avoid round-off errors in calculated results.

STL Tampa

## Quality Control Results

Client: Air Spec

Job Number: 660-483.1

### FL-PRO Florida Method for Determination of Petroleum Range Organics by GC/FID

#### Method Blank - Batch: 660-2480

Lab ID: MB 660-2480/1-A  
Matrix: Water

Date Analyzed: 03/10/2005 1251  
Units: mg/L

Dilution: 1.0

Analyte	Result	Qualifier	MDL	RQL
FL PRO	0.10	U	0.10	0.30

#### Laboratory Control Sample - Batch: 660-2480

Lab ID: LCS 660-2480/2-A  
Matrix: Water

Date Analyzed: 03/10/2005 1311  
Units: mg/L

Dilution: 1.0

Analyte	Spike Amount	Result	% Rec.	Recovery Limits	Qualifier
FL PRO	2.72	2.6	96	55 - 118	

LCS Lab ID:  
LCSD Lab ID:  
Matrix:

Date Analyzed:  
Date Analyzed:  
Units:

Dilution:  
Dilution:

Analyte	% Recovery		Recovery Limits	RPD	RPD Limit	Qualifier
	LCS	LCSD				

Calculations are performed before rounding to avoid round-off errors in calculated results.

STL Tampa

## ANALYTICAL REPORT

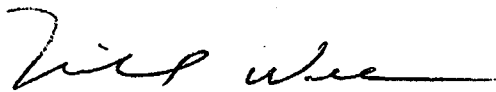
Job Number: 660-472.1

Job Description: Sumter County

For:

Air Spec  
1114 W. Dixie Ave.  
Leesburg, FL 34748

Attention: Patricia Snowden



Mike Valder  
Project Manager II  
mvalder@stl-inc.com

03/14/2005

Methods: FDEP, DOH Certification #: E84282 These test results meet all the requirements of NELAC. All questions regarding this test report should be directed to the STL Project Manager who signed this test report. The estimated uncertainty associated with these reported results is available upon request.

## METHOD SUMMARY

Client: Air Spec

Job Number: 660-472.1

Job Description: Sumter County

Description	Method	Preparation Method
Matrix: Air - Tedlar		
Volatile Organic Compounds in Air	EPA EPA-18	

## REFERENCES

EPA - US Environmental Protection Agency

**SAMPLE SUMMARY**

Client: Air Spec

Job Number: 660-472.1

Job Description: Sumter County

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
660-472-1	AIR INSIDE	Air - Tedlar Bag	03/02/2005 1445	03/03/2005 0840
660-472-2	AIR OUTSIDE	Air - Tedlar Bag	03/02/2005 1445	03/03/2005 0840

## **SAMPLE RESULTS**

**Analytical Data**

Client: Air Spec

Job Number: 660-472.1

Client Sample ID: AIR INSIDE

Lab Sample ID: 660-472-1

Date Sampled: 03/02/2005 1445

Client Matrix: Air - Tedlar

Date Received: 03/03/2005 0840

**EPA-18 Volatile Organic Compounds in Air**

Method: EPA-18

Analysis Batch: 660-2511

Instrument ID: VARIAN PID/FID

Preparation: N/A

Lab File ID: 2C03G25.d

Dilution: 1.0

Initial Weight/Volume:

Date Analyzed: 03/04/2005 0512

Final Weight/Volume: 25 mL

Date Prepared: N/A

Injection Volume:

Analyte	Result (mg/m3)	Qualifier	MDL	PQL
Benzene	0.16	U	0.16	1.0
Ethylbenzene	0.24	U	0.24	1.0
Toluene	0.20	U	0.20	1.0
m-Xylene & p-Xylene	0.24	U	0.24	1.0
o-Xylene	0.24	U	0.24	1.0
Methyl tert-butyl ether	0.40	U	0.40	1.0
Total Hydrocarbons	0.80	U	0.80	10

## Analytical Data

Client: Air Spec

Job Number: 660-472.1

Client Sample ID: AIR OUTSIDE

Lab Sample ID: 660-472-2

Date Sampled: 03/02/2005 1445

Client Matrix: Air - Tedlar

Date Received: 03/03/2005 0840

## EPA-18 Volatile Organic Compounds in Air

Method: EPA-18  
Preparation: N/A  
Dilution: 1.0  
Date Analyzed: 03/04/2005 0611  
Date Prepared: N/A

Analysis Batch: 660-2511

Instrument ID: VARIAN PID/FID  
Lab File ID: 2C03G27.d  
Initial Weight/Volume:  
Final Weight/Volume: 25 mL  
Injection Volume:

Analyte	Result (mg/m3)	Qualifier	MDL	PQL
Benzene	0.16	U	0.16	1.0
Ethylbenzene	0.24	U	0.24	1.0
Toluene	5.5		0.20	1.0
m-Xylene & p-Xylene	0.24	U	0.24	1.0
o-Xylene	0.36	I	0.24	1.0
Methyl tert-butyl ether	0.40	U	0.40	1.0
Total Hydrocarbons	15		0.80	10



# DATA REPORTING QUALIFIERS

Client: Air Spec

Job Number: 660-472.1

Lab Section	Qualifier	Description
Air Toxics	U	Indicates that the compound was analyzed for but not detected.
	I	The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

## **QUALITY CONTROL RESULTS**

**Quality Control Results**

Client: Air Spec

Job Number: 660-472.1

Job Description: Sumter County

**QC Association Summary**

Lab Sample ID	Client Sample ID	Client Matrix	Method	Prep Batch
<b>Air Toxics</b>				
<b>Analysis Batch:660-2511</b>				
LCS 660-2511/1	Lab Control Spike	Air - Tedlar	EPA-18	
LCSD 660-2511/2	Lab Control Spike Duplicate	Air - Tedlar	EPA-18	
MB 660-2511/9	Method Blank	Air - Tedlar	EPA-18	
660-472-A-1	AIR INSIDE	Air - Tedlar	EPA-18	
660-472-A-2	AIR OUTSIDE	Air - Tedlar	EPA-18	
<b>Analysis Batch:660-2512</b>				
MB 660-2512/7	Method Blank	Air - Tedlar	EPA-18	
660-472-A-1	AIR INSIDE	Air - Tedlar	EPA-18	
660-472-A-2	AIR OUTSIDE	Air - Tedlar	EPA-18	

**Quality Control Results**

Client: Air Spec

Job Number: 660-472.1

**EPA-18 Volatile Organic Compounds in Air**
**Method Blank - Batch: 660-2511**

Lab ID: MB 660-2511/9

Date Analyzed: 03/03/2005 2113

Dilution: 1.0

Matrix: Air - Tedlar Bag

Units: mg/m3

Analyte	Result	Qualifier	MDL	PQL
Benzene	0.16	U	0.16	1.0
Ethylbenzene	0.24	U	0.24	1.0
Toluene	0.20	U	0.20	1.0
m-Xylene & p-Xylene	0.24	U	0.24	1.0
o-Xylene	0.24	U	0.24	1.0
Methyl tert-butyl ether	0.40	U	0.40	1.0

**Laboratory Control Sample/ Control Duplicate - Batch: 660-2511**

LCS Lab ID: LCS 660-2511/1

Date Analyzed: 03/03/2005 2243

Dilution: 1.0

LCSD Lab ID: LCSD 660-2511/2

Date Analyzed: 03/03/2005 2343

Dilution: 1.0

Matrix: Air - Tedlar Bag

Units: mg/m3

Analyte	% Recovery		Recovery Limits	RPD	RPD Limit	Qualifier
	LCS	LCSD				
Benzene	85	83	60 - 140	3	30	
Ethylbenzene	119	96	60 - 140	21	30	
Toluene	94	85	60 - 140	10	30	
m-Xylene & p-Xylene						
o-Xylene	130	110	60 - 140	17	30	

Calculations are performed before rounding to avoid round-off errors in calculated results.

STL Tampa



STL

## Quality Control Results

Client: Air Spec

Job Number: 660-472.1

### EPA-18 Volatile Organic Compounds in Air

#### Method Blank - Batch: 660-2512

Lab ID: MB 660-2512/7

Date Analyzed: 03/03/2005 2113

Dilution: 1.0

Matrix: Air - Tedlar Bag

Units: mg/m3

Analyte	Result	Qualifier	MDL	PQL
Total Hydrocarbons	0.80	U	0.80	10

Calculations are performed before rounding to avoid round-off errors in calculated results.

STL Tampa

6/29/04



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
3804 COCONUT PALM DRIVE  
TAMPA, FL 33619-1352**

**FAXED**

**FAX**

Date: 6/29/04  
Number of pages including cover sheet: 3

TO:	FROM:
KARL RUTHERFORD, CTL	JOHN MORRIS
PHONE:	PHONE: (813) 744-6100, EXT. 336
FAX #: 352 - 728 - 2245	FAX #: (813) 744-6125
CC:	
REMARKS: Urgent <input checked="" type="checkbox"/> For your review Reply ASAP Please comment	
KARL -	
THE ATTACHED PAGES PROVIDE THE PARAMETER LIST TO CHARACTERIZE THE TOXICITY	
CHARACTERISTIC OF THE LIQUID SAMPLES FROM THE SCRUBBER UNIT AT THE	
SUMTER COUNTY COMPOSTING FACILITY, AS YOU REQUESTED. THE SOURCE OF	
THIS INFORMATION IS 40 CFR PART 261, SUBPART C, 261.24.	
John	

**Title 40: Protection of Environment****PART 261—IDENTIFICATION AND LISTING OF HAZARDOUS WASTE****Subpart C—Characteristics of Hazardous Waste**[Browse Previous](#)**§ 261.24 Toxicity characteristic.**

(a) A solid waste (except manufactured gas plant waste) exhibits the characteristic of toxicity if, using the Toxicity Characteristic Leaching Procedure, test Method 1311 in “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” EPA Publication SW-846, as incorporated by reference in §260.11 of this chapter, the extract from a representative sample of the waste contains any of the contaminants listed in table 1 at the concentration equal to or greater than the respective value given in that table. Where the waste contains less than 0.5 percent filterable solids, the waste itself, after filtering using the methodology outlined in Method 1311, is considered to be the extract for the purpose of this section.

(b) A solid waste that exhibits the characteristic of toxicity has the EPA Hazardous Waste Number specified in Table I which corresponds to the toxic contaminant causing it to be hazardous.

Table 1\_Maximum Concentration of Contaminants for the Toxicity  
Characteristic

EPA HW No. \1\	Contaminant	CAS No. \2\	Regulatory Level (mg/ L)
D004	Arsenic.....	7440-38-2	5.0
D005	Barium.....	7440-39-3	100.0
D018	Benzene.....	71-43-2	0.5
D006	Cadmium.....	7440-43-9	1.0
D019	Carbon tetrachloride.....	56-23-5	0.5
D020	Chlordane.....	57-74-9	0.03
D021	Chlorobenzene.....	108-90-7	100.0
D022	Chloroform.....	67-66-3	6.0
D007	Chromium.....	7440-47-3	5.0
D023	o-Cresol.....	95-48-7	\4\ 200.0
D024	m-Cresol.....	108-39-4	\4\ 200.0
D025	p-Cresol.....	106-44-5	\4\ 200.0
D026	Cresol.....	.....	\4\ 200.0
D016	2,4-D.....	94-75-7	10.0
D027	1,4-Dichlorobenzene.....	106-46-7	7.5
D028	1,2-Dichloroethane.....	107-06-2	0.5
D029	1,1-Dichloroethylene.....	75-35-4	0.7
D030	2,4-Dinitrotoluene.....	121-14-2	\3\ 0.13
D012	Endrin.....	72-20-8	0.02
D031	Heptachlor (and its epoxide).	76-44-8	0.008
D032	Hexachlorobenzene.....	118-74-1	\3\ 0.13
D033	Hexachlorobutadiene.....	87-68-3	0.5
D034	Hexachloroethane.....	67-72-1	3.0
D008	Lead.....	7439-92-1	5.0
D013	Lindane.....	58-89-9	0.4
D009	Mercury.....	7439-97-6	0.2
D014	Methoxychlor.....	72-43-5	10.0
D035	Methyl ethyl ketone.....	78-93-3	200.0

D036	Nitrobenzene.....	98-95-3	2.0
D037	Pentachlorophenol.....	87-86-5	100.0
D038	Pyridine.....	110-86-1	\3\ 5.0
D010	Selenium.....	7782-49-2	1.0
D011	Silver.....	7440-22-4	5.0
D039	Tetrachloroethylene.....	127-18-4	0.7
D015	Toxaphene.....	8001-35-2	0.5
D040	Trichloroethylene.....	79-01-6	0.5
D041	2,4,5-Trichlorophenol.....	95-95-4	400.0
D042	2,4,6-Trichlorophenol.....	88-06-2	2.0
D017	2,4,5-TP (Silvex).....	93-72-1	1.0
D043	Vinyl chloride.....	75-01-4	0.2

---

\1\ Hazardous waste number.

\2\ Chemical abstracts service number.

\3\ Quantitation limit is greater than the calculated regulatory level.  
The quantitation limit therefore becomes the regulatory level.

\4\ If o-, m-, and p-Cresol concentrations cannot be differentiated, the  
total cresol (D026) concentration is used. The regulatory level of  
total cresol is 200 mg/l.

[55 FR 11862, Mar. 29, 1990, as amended at 55 FR 22684, June 1, 1990; 55 FR 26987,  
June 29, 1990; 58 FR 46049, Aug. 31, 1993; 67 FR 11254, Mar. 13, 2002]



\*\* Transmit Conf. Report \*\*

P.1

Jun 29 2004 15:40

Telephone Number	Mode	Start	Time	Pages	Result	Note
813527282245	FINE	29,15:36	2'50"	3	* O K	

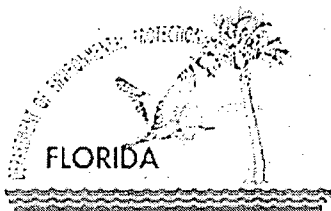


**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
3804 COCONUT PALM DRIVE  
TAMPA, FL 33619-1352**

**FAX**

Date: 6/29/04  
Number of pages including cover sheet: 3

TO:	FROM:
KARL RUTHERFORD, CTL	JOHN MORRIS
PHONE:	PHONE: (813) 744-6100, EXT. 336
FAX #: 352-728-2245	FAX #: (813) 744-6125
CC:	
REMARKS:	Urgent <input checked="" type="checkbox"/> For your review Reply ASAP Please comment
KARL -	
THE ATTACHED PAGES PROVIDE THE PARAMETER LIST TO CHARACTERIZE THE TOXICITY	
CHARACTERISTIC OF THE LIQUID SAMPLES FROM THE SCRAPER UNIT AT THE	
C - - - - - FOR - - - - - REQUESTED THE SAMPLE OF	



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619-1352

Colleen M. Castille  
Secretary

DATE: 5-21-04

TIME: 10:10

LOCATION/CONFERENCE ROOM: WATER FACILITIES

SUBJECT: CITY OF WILDWOOD WWTF

## ATTENDEES

Name	Affiliation	Telephone	Email
<u>Cheryl Minskey</u>	<u>FDEP</u>	<u>(813) 744-6100 x 302</u>	<u>Cheryl.Minskey@dep.state.fl.us</u>
<u>JEFF HILTON</u>	<u>FDEP</u>	<u>X413</u>	<u>JEFF.HILTON@DEP.STATE.FL.US</u>
<u>JEFF GREENWELL</u>	<u>FDEP</u>	<u>X307</u>	<u>JEFF.GREENWELL@DEP.STATE.FL.US</u>
<u>SUSAN PELZ</u>	<u>FDEP</u>	<u>X386</u>	<u>SUSAN.PELZ@DEP.STATE.FL.US</u>
<u>Ed Wolf</u>	<u>City of Wildwood</u>	<u>352-330-1332</u>	
<u>Joni A. Blair</u>	<u>City of Wildwood</u>	<u>352 343 3755</u>	
<u>Jim Stevens</u>	<u>City of Wildwood</u>	<u>(352) 330-1330</u>	
<u>William Bennett</u>	<u>City of Wildwood</u>	<u>352 330 1349</u>	
<u>Ron Ferland</u>	<u>BARNES, FERLAND &amp; ASSOC., INC.</u>	<u>(407) 896-8608</u>	<u>rferland@bfgenvironmental.com</u>
<u>Pete Burghardt</u>	<u>FDEP</u>	<u>Ext. 311</u>	<u>pete.burghardt@dep.state.fl.us</u>

(352) 343-3755

FAX: (352) 343-5301

**JERRI A. BLAIR**

ATTORNEY AND COUNSELOR AT LAW

LOCKETT & BLAIR, P.A.  
351 WEST ALFRED STREET  
POST OFFICE BOX 130  
TAVARES, FLORIDA 32778

5/21/04

## City of Wildwood

cm They will modify their WWTP permit  
They can do fecal coliform testing on ~~the~~  
monitor temperatures

They say they ~~can~~ produce "Class B"  
based on aerobic digestion

They think ~~the~~ ~~the~~ the Dept indicated acceptance  
of "Class B" since DW said ok to go to Compost Facility  
Permit modification -  
to correct "oversight"

Documentation <sup>they will</sup> send to Sumter County - demonstrating it's Class B

They will test -

geometric <sup>fecal</sup> mean  $\leq 2$  million CFU's? = "Class B" PRP

~~modification~~



**Springstead  
Engineering, Inc.**

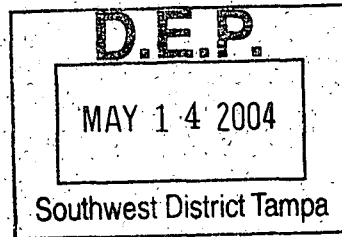
Consulting Engineers - Architects - Planners - Surveyors

5/17/04  
EB - 0001723  
AA - 0002820  
LB - 0001723

727 South 14th Street  
Leesburg, Florida 34748

Lake (352) 787-1414  
Sumter (352) 793-3639  
Fax (352) 787-7221

May 13, 2004



Mr. Steve Morgan  
Southwest District  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

RE: Compost Temperature in Permit  
Permit No. 126940-010-SO  
Sumter County Public Works Department  
SEI File No. 921100.019

Dear Mr. Morgan:

Upon review of the composting permit issued on April 30, 2004, condition 7(k) indicates that the compost materials shall remain a minimum of 72 hours in the digester unit, at a minimum temperature of 141° F. (55° C) with a target moisture content of 55% by weight, unless the permittee demonstrates that a reduced time period does not adversely affect the effectiveness of the composting process...

The 141° F in the Operation Manual is a target temperature. The temperature that corresponds to the minimum temperature of 55° C, as stated in the definition of disinfection in 62-701.200(31), is 131° F. We request that if a minimum temperature is required by condition, the temperature be modified to 131° F.

Please review this information and contact me if you have any questions.

Very truly yours,  
Springstead Engineering, Inc.

  
David W. Springstead, P.E.  
Florida Registration No. 48229

DWS/jal

cc: Chuck Jett  
Bernard Dew  
Mitch Kessler

# 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: April 30, 2004

FILE NAME: Sumter County Composting Facility

PERMIT #: 126940-010-SO

PROGRAM : Solid Waste

COUNTY : Sumter

TYPE OF PERMIT ACTION: X ISSUE

    DENY

    MODIFY

    TRANSFER OWNER

    NOD

    PUBLIC NOTICE

    INTENT TO ISSUE

PUBLIC NOTICE PERIOD CLOSED - N/A

PETITION FILED - N/A

**PERMIT SUMMARY:** This is a permit renewal for the Sumter County Composting Facility. The permit incorporates the approval to operate Digester #2, but withdraws approval to operate Digester #1 until repairs are proposed, completed, and approved by the Department.

**PROFESSIONAL RECOMMENDATION:**    X    APPROVE     DENY

**EVALUATION SUMMARY:** The applicant has provided sufficient information to allow for issuance of this permit.

Application received - February 24, 2003

Application complete - February 2, 2004

Department processing time- 146 days (to 4-30-04)

Initial review - 30 days (2/24/03 - 3/25/03)

RAI #1 response review - 28 days (10/09/03 - 11/7/03)

Issue Permit - 88 days (2/2/04 - 4/30/04)

Total processing time - 431 days (to 4-30-04)

**DAY 90/30 FOR THIS ACTION IS: Day 90 = 5-2-04**

FYI



To: Susan Pelz, P.E.  
Solid Waste

4/30/04

From: Pete Berglund  
Domestic Wastewater

RE: City of Wilfredo WWTFF & Santa Co  
Compost Fac.

Please find a copy of the 4/28/04 FAX  
I received from the City of Wilfredo's  
Attorney. Also I have attached  
Cheryl's Review of the Submittal.


The last Page was Rec. today & is  
a letter from Attorney Blair to  
Santa Co Atty.


I am drafting a letter from Jeff Greenell  
to Wilfredo addressing the several misstatements  
and misrepresentations contained in Wilfredo's  
letter. I will e-mail it to you when  
signed.

# Florida Department of Environmental Protection

Sumter Co  
Compost  
permit

## Memorandum

TO:  Pete Burghardt, Domestic Wastewater

FROM: Cheryl Minskey, Residuals Coordinator 

SUBJECT: City of Wildwood WWTF Residuals  
Facility ID # FLA013497

DATE: April 29, 2004

After reviewing the April 28, 2004, correspondence submitted to the Department, City of Wildwood WWTF (Wastewater Treatment Facility) permit, and permit application regarding the City of Wildwood WWTF residual's treatment and disposition I have the following comments;

1. Permit Condition II of domestic wastewater permit, FLA013497, specifies residuals management requirements. Under this condition, the disposition and treatment requirements are identified. There is no indication that residuals are classified as Class B in the facility permit. If residuals are classified as "B", the permit would specify this as well as the specific pathogen and vector attraction reduction requirements necessary to achieve Class B residuals.
2. Under item 7 on page 2A-7 of Wastewater Application Form 2A, residuals treatment is indicated as Class B however under item 13 on page 2A-5 it is indicated that residuals are transported to the Sumter County Composting Facility for treatment. The Operation and Maintenance Report, submitted with the permit application, should identify the facility's method of achieving Class B and thus clarify this. The information in the report only indicates that sludge from the facility will be de-watered. There is no supporting documentation to indicate that treatment to Class B residuals is being conducted at the wastewater facility.
3. The residuals analysis, submitted with the April 28, 2004 correspondence, does not contain information showing that residuals are treated to Class B with respect to meeting the pathogen and vector attraction requirements. Information is provided that indicates sludge from this facility meets the ceiling concentrations for pollutant parameters.
4. Although the Pathogen Reduction Class is marked "B" on the Residuals Annual Summary, this alone does not provide reasonable assurance that Class B is being attained.

Recommendations: I suggest that the representative submit information to the Department on how the facility's is meeting Class B requirements for residuals and identify the pathogen and vector attraction reduction methods practiced at the facility if they wish to modify the permit to produce Class B residuals.



# *Lockett & Blair, P.A.*

Attorneys and Counselors At Law

Jerri A. Blair  
Attorney at Law

351 W. Alfred St.  
P.O. Box 130  
Tavares, FL 32778-0130  
(352) 343-3755  
(352) 343-5301 fax

Jerry T. Lockett  
Retired Circuit Judge

April 28, 2004

## **VIA FACSIMILE 813-744-8198 AND MAIL**

Pete Burghardt  
Environmental Specialist II  
Domestic Wastewater Section  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

Re: City of Wildwood WWTF  
Facility ID # FLA 013497 Sumter County

Dear Mr. Burghardt:

I am the city attorney for the City of Wildwood, Florida. In response to your letter of April 23, 2004, directed to Jim Stevens concerning delivery by the City of Wildwood of wastewater residual to Sumter County composting facility, solid waste permit number 126940-001-SO, the City of Wildwood is properly permitted to deliver residuals to Sumter County. Although it does not appear that Sumter County has a requirement in its permit that it accept domestic wastewater residuals stabilized at a minimum to Class B, in fact, the City's wastewater residuals are stabilized to Class B. In the permit application filed by the City with the Department, it was made clear that the City would be treated to a Class B level. I enclose for your review a copy of the most recent annual residual report which also indicates that the City's pathogen reduction class is Class B. The City has always understood that it was producing sludge at the Class B level.

Because your letter indicates that the only problem with the delivery of the City of its residuals to Sumter County is that Sumter County requires wastewater residuals stabilized at a minimum to Class B, it would appear there is no problem in the City continuing to dispose of its residuals with Sumter County. The City will continue to deliver its residuals to Sumter County since it meets the requirements laid out in your letter of April 23, 2004.

I wanted to avoid the unnecessary expenses that the City would incur if it were required to

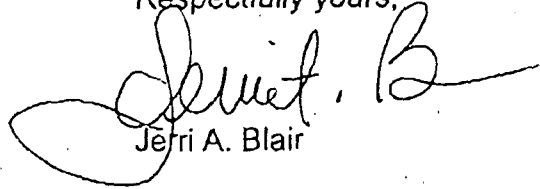
Pete Burghardt  
April 28, 2004  
Page 2

deliver to another residual management facility.

I will be following up with more documentation to support this position. I would suggest that you review the permit application on record in your file which will show you that the City is indeed producing Class B level residuals.

Please let me know as soon as possible if you have any questions with regard to this issue.

Respectfully yours,



Jerri A. Blair

JAB/vgv

cc: Mayor Ed Wolf  
James R. Stevens (via facsimile 352-330-1338)  
Ron Ferland  
Vince Ruano  
Chuck Jett  
Tommy Hurst  
Pete Bennett (via facsimile 352-330-1350)

ww#12  
A:\CORRESP\burghardt dep.1.wpd

# FILE

*City of Wildwood Florida  
Wastewater Treatment Plant  
1290 Industrial Drive Wildwood, Florida 34786*

*William Bennett - Director*

*Telephone #352-330-1349*

*Fax # 352-330-1360*

**CERTIFIED MAIL**

7000 0600 0023 9895 0632

February 24, 2004

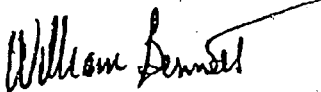
Ms. Stephanie O. Barrios  
State of Florida  
Dept. of Environmental Protection  
3804 Coconut Palm Dr.  
Tampa, FL 33619

Dear Ms. Barrios:

Enclosed is the Annual Residuals Report for 1/03 - 12/03 for City of Wildwood Wastewater Treatment Plant.

Should you have any questions or comments feel free to call me at (352) 330-1349.

Sincerely,



William Bennett  
Wastewater Director

C: Jim Stevens, City Manager



# Florida Department of Environmental Protection

Twin Towers Office Bldg, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400

## Residuals Annual Summary

### Part I - Facility Information

FACILITY NAME: Wildwood WWTP

FACILITY ID:

FLA013497

MAILING ADDRESS: 100 N. Main St

MONITORING PERIOD - From: JAN 1,

03

To: DEC 31, 03

Wildwood, FL 34785

Total Quantity of Residuals Applied During Reporting Period: 401.879 dry tons

Total Number of Residuals Land Application Sites Used During Reporting Period: 0 (Parts II and III should address all residuals land application sites used)

Update of Residuals Characteristics (arithmetic average of all samples taken pursuant to Rule 62-640.650(1), F.A.C., during the reporting period):

Parameter	Units*	Ceiling Limits for Class A and B	Concentration	Parameter (continued)	Units*	Ceiling Limits for Class A and B	Concentration
Total Nitrogen	%	N/A	5.503	Copper	mg/kg	4300	447.950
Total Phosphorus	%	N/A	3.283	Lead	mg/kg	840	23.990
Total Potassium	%	N/A	.721	Mercury	mg/kg	57	.936
Total Solids	%	N/A	1.223	Molybdenum	mg/kg	75	9.800
pH	std. units	N/A	6.843	Nickel	mg/kg	420	79.777
Arsenic	mg/kg	75	BDL	Selenium	mg/kg	100	133.705
Cadmium	mg/kg	85	20.005	Zinc	mg/kg	7500	427.400

\*All units are in a dry weight basis except for total solids and pH. All sampling and analysis shall be conducted pursuant to Title 40 Code of Federal Regulations, Section 503.8, and the POTW Sludge Sampling and Analysis Guidance Document.

NA = not applicable

Pathogen Reduction Class (Rule 62-640.600(1), F.A.C.):

☐ A

☒ B

EPA Vector Attraction Reduction Option (Rule 62-640.600(2), F.A.C.):

☒ 1

☐ 2

☐ 3

☐ 4

☐ 5

☐ 6

☐ 7

☐ 8

☐ 9

☐ 10

### Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT (Type or Print)	TELEPHONE NO.
William Bennett - Director	352-330-1349
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	DATE (YY/MM/DD)
<i>William Bennett</i>	04-02-27

**SUMMARY OF LABORATORY ANALYSIS  
FOR SLUDGE DISPOSED  
AT SUMTER COUNTY SOLID WASTE  
COMPOST FACILITY**

PARAMETER	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Average Concentration
Total Nitrogen (%)	5.590	7.190	3.720	5.510	5.503
Total Phosphorous (%)	3.780	3.000	3.210	3.140	3.283
Potassium (%)	0.792	0.811	0.646	0.633	0.721
% Solids	1.300	1.130	1.210	1.250	1.223
pH	6.870	6.910	6.810	6.780	6.843
Arsenic	<7.692	<44.25	<8.248	<8.000	BDL
Cadmium	<7.692	<44.25	16.740	23.270	20.005
Chromium	53.220	175.200	44.690	50.060	80.793
Copper	396.100	429.200	493.100	473.400	447.950
Lead	23.990	<88.50	<16.49	<15.99	23.990
Mercury	<0.38462	<0.44248	1.471	0.400	0.936
Molybdenum	8.154	9.115	8.579	13.350	9.800
Nickel	<7.692	90.270	69.090	79.970	79.777
Selenium	46.610	220.800	<16.49	<15.99	133.705
Zinc	483.000	423.900	369.300	433.400	427.400

	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	TOTAL
Wasted to Digester (MGD)	3.614	3.795	2.795	3.365	13.569
Gallons Pressed (MGD)	2.171	2.100	1.825	1.728	7.824
Dry Tons Hauled	125.154	104.71	83.495	88.52	401.879

	<u>Wasted</u>	<u>Pressed</u>	<u>Hauled</u>
Jan	1116057	707000	43.952
Feb	1203483	703000	40.332
Mar	1,294,855	761,000	40.87
	<b>3614395</b>	<b>2171000</b>	<b>125.154</b>
April	1322562	883000	44.644
May	1298782	832000	31.858
June	1174109	585000	28.208
	<b>3,795,453</b>	<b>2,100,000</b>	<b>104.71</b>
July	728046	683000	32.055
Aug	1114523	638000	29.963
Sept.	952556	504000	21.477
	<b>2795126</b>	<b>1825000</b>	<b>83.495</b>
Oct.	1,162,388	582,000	30.69
Nov	1053461	454000	24.175
Dec	1149365	692000	33.661
	<b>3,365,214</b>	<b>1,728,000</b>	<b>88.52</b>

April 2, 2003

Page 2

TestAmerica Corp.

CLIENT: CITY OF WILDWOOD  
100 NORTH MAIN STREET  
WILDWOOD, FL 34785

ATTN:

Order Number: 30784  
Project Name: DIGESTER SLUDGE  
Sample ID: DIGESTER SLUDGE  
Lab Number: 03-F5602  
Date Collected: 03/12/03  
Time Collected: 08:00  
Date Received: 03/12/03

# LABORATORY REPORT

Analyte	Result	Q	Units	Report Limit	Dil Factor	Date	Time	Analyst	Method	Batch
<b>*METALS*</b>										
Arsenic	< 7.692	U	mg/kg	7.691	1	3/19/03	21:43	CLL	6010B	85
Cadmium	< 7.692	U	mg/kg	7.691	1	3/19/03	21:43	CLL	6010B	85
Chromium	53.22		mg/kg	7.691	1	3/19/03	21:43	CLL	6010B	85
Copper	396.1		mg/kg	7.691	1	3/20/03	19:24	CLL	6010B	411
Lead	23.99		mg/kg	15.38	1	3/19/03	21:43	CLL	6010B	85
Mercury	< 0.38462	U	mg/kg	0.38462	1	3/14/03		JL	7471A	9919
Molybdenum	8.154		mg/kg	3.845	1	3/19/03	21:43	CLL	6010B	85
Nickel	< 7.692	U	mg/kg	7.691	1	3/19/03	21:43	CLL	6010B	85
Potassium % Weight	0.792		%	0.0308	1	3/19/03	21:43	CLL	calc.	
Selenium	46.61		mg/kg	15.38	1	3/19/03	21:43	CLL	6010B	85
Zinc	483.0		mg/kg	38.45	1	3/19/03	21:43	CLL	6010B	85

Results have been corrected for dry weight (see % Solids below).

## \*GENERAL PARAMETERS\*

% Solids	1.30	%	0.00	1	3/14/03	17:15	RV	SN 25406	18
pH	6.87	pH Units		1	3/12/03	18:00	KG	150.1	9907
Percent Total Phosphate	3.78	%	1.42	20	3/29/03	23:10	REM	365.2 calc.	898
Total Nitrogen Percent	5.59	%	0.00962	1	4/ 2/03	10:30	CLL	Calc.	
Percent TKN as N	5.59	%	0.0839	20	3/29/03	23:10	REM	CE3-201/351.2	899

Sample report continued . . .

2<sup>nd</sup> QTR

June 10, 2003

Page 2

TestAmerica Corp.

CLIENT: CITY OF WILDWOOD  
100 NORTH MAIN STREET  
WILDWOOD, FL 34785

ATTN: BOBBY VALENTICH

Order Number: 32388  
Project Name: DIGESTER SLUDGE  
Sample ID: DIGESTER SLUDGE  
Lab Number: 03-F11066  
Date Collected: 05/20/03  
Time Collected: 09:00  
Date Received: 05/20/03

## LABORATORY REPORT

Analyte	Result	Q	Units	Report Limit	Dil Factor	Date	Time	Analyst	Method	Batch
<b>*METALS*</b>										
Arsenic	< 44.25	U	mg/kg	44.25	1	6/ 5/03	17:09	CLL	6010B	4914
Cadmium	< 44.25	U	mg/kg	44.25	1	6/ 5/03	17:09	CLL	6010B	4914
Chromium	175.2		mg/kg	44.25	1	6/ 5/03	17:09	CLL	6010B	4914
Copper	429.2		mg/kg	8.850	1	5/27/03	1:31	CLL	6010B	4676
Lead	< 88.50	U	mg/kg	88.50	1	6/ 4/03	14:53	CLL	6010B	5401
Mercury	< 0.44248	U	mg/kg	0.44248	1	5/23/03		JL	7471A	4303
Molybdenum	9.115		mg/kg	4.425	1	5/27/03	1:31	CLL	6010B	4676
Nickel	90.27		mg/kg	44.25	1	6/ 4/03	14:53	CLL	6010B	5401
Potassium % Weight	0.811		%	0.0354	1	5/27/03	1:31	CLL	calc.	
Selenium	220.8		mg/kg	88.50	1	6/ 5/03	17:09	CLL	6010B	4914
Zinc	423.9		mg/kg	44.25	1	5/27/03	1:31	CLL	6010B	4676

Results have been corrected for dry weight (see % Solids below).

## \*GENERAL PARAMETERS\*

% Solids	1.13		%	0.00	1	5/23/03	16:30	RV	SM 25408	4473
pH	6.91		pH Units		1	5/20/03	16:35	KG	150.1	4264
Percent Total Phosphate	3.00		%	1.10	20	5/22/03	10:18	SP	365.2 calc.	4412
Total Nitrogen Percent	7.19		%	0.0111	1	5/27/03	12:38	SP	Calc.	
Percent TKN as N	7.19	J4	%	0.0664	20	5/22/03	10:18	SP	CE3-201/351.2	4409

Sample report continued . . .

3<sup>rd</sup> QTR

January 14, 2004

Page 2

CLIENT: CITY OF WILDWOOD  
100 NORTH MAIN STREET  
WILDWOOD, FL 34785

ATTN: BOBBY VALENTICH

Order Number: 34491  
Project Name: DIGESTER SLUDGE  
Sample ID: DIGESTER SLUDGE  
Lab Number: 03-F17993  
Date Collected: 08/21/03  
Time Collected: 15:30  
Date Received: 08/22/03

## LABORATORY REPORT

Analyte	Result	Q	Units	Report Limit	Dil Factor	Date	Time	Analyst	Method	Batch
<b>*METALS*</b>										
Arsenic	< 8.248	U	mg/kg	8.245	1	9/ 4/03	4:05	LSM	6010B	533
Cadmium	16.74		mg/kg	8.245	1	9/ 4/03	4:05	LSM	6010B	533
Chromium	44.69		mg/kg	8.245	1	9/ 4/03	4:05	LSM	6010B	533
Copper	493.1		mg/kg	8.245	1	9/ 4/03	4:05	LSM	6010B	533
Lead	< 16.49	U	mg/kg	16.49	1	9/ 4/03	4:05	LSM	6010B	533
Mercury	1.4711		mg/kg	0.41322	1	8/26/03		JL	7471A	9662
Molybdenum	8.579		mg/kg	4.122	1	9/ 4/03	4:05	LSM	6010B	533
Nickel	69.09		mg/kg	8.245	1	9/ 4/03	4:05	LSM	6010B	533
Potassium % Weight	0.646		%	0.0330	1	9/ 4/03	4:05	LSM	calc.	
Selenium	< 16.49	U	mg/kg	16.49	1	9/ 5/03	22:25	LSM	6010B	1371
Zinc	369.3		mg/kg	41.22	1	9/ 4/03	4:05	LSM	6010B	533

Results have been corrected for dry weight (see % Solids below).

## \*GENERAL PARAMETERS\*

% Solids	1.21		%	0.00	1	8/22/03	16:43	RV	SM 25406	536
pH	6.81		pH Units		1	8/22/03	16:05	AC	150.1	555
Total Phosphorus as P	3.21		%	1.37	20	8/29/03	15:54	SP	calc.	998
Percent Total Nitrogen	3.72		%	0.0103	1	8/29/03	15:54	SP	calc.	
Percent TXN as N	3.72		%	0.0826	20	8/29/03	15:54	SP	CE3-201/351.2	997

if requested: phosphorus, nitrogen, TXN results have been corrected for dry weight.

Sample report continued . . .



January 2, 2004

Page 2

CLIENT: CITY OF WILDWOOD  
100 NORTH MAIN STREET  
WILDWOOD, FL 34785

ATTN: BOBBY VALENTICH

Order Number: 36143  
Project Name: DIGESTER SLUDGE  
Sample ID: DIGESTER SLUDGE  
Lab Number: 03-P23373  
Date Collected: 11/25/03  
Time Collected: 09:00  
Date Received: 11/26/03

## LABORATORY REPORT

Analyte	Result	Q	Units	Report Limit	Dil Factor	Date	Time	Analyst	Method	Batch
<b>*METALS*</b>										
Arsenic	< 8.000	U	mg/kg	7.997	1	12/ 5/03	20:00	CLL	6010B	8105
Cadmium	23.27		mg/kg	7.997	1	12/ 5/03	20:00	CLL	6010B	8105
Chromium	50.06		mg/kg	7.997	1	12/ 5/03	20:00	CLL	6010B	8105
Copper	473.4		mg/kg	7.997	1	12/ 5/03	20:00	CLL	6010B	8105
Lead	< 15.99	U	mg/kg	15.99	1	12/ 5/03	20:00	CLL	6010B	8105
Mercury	0.40000		mg/kg	0.40000	1	12/ 2/03	13:33	CLL	7471A	8088
Molybdenum	13.35		mg/kg	3.998	1	12/ 5/03	20:00	CLL	6010B	8105
Nickel	79.97		mg/kg	7.997	1	12/10/03	23:05	LSM	6010B	8643
Potassium % Weight	0.633		%	0.0320	1	12/ 5/03	20:00	CLL	calc.	
Selenium	< 15.99	U	mg/kg	15.99	1	12/ 5/03	20:00	CLL	6010B	8105
Zinc	433.4		mg/kg	39.98	1	12/10/03	23:05	LSM	6010B	8643

Results have been corrected for dry weight (see % Solids below).

## \*GENERAL PARAMETERS\*

% Solids	1.25		%		1	11/26/03	15:15	RV	SM 25406	7819
pH	6.78		pH Units		1	11/26/03	13:30	DP	150.1	7821
Nitrate-Nitrite	0.019		%	0.0100	1	12/ 5/03	17:28	SP	353.2	8456
Percent Total Phosphate	3.14		%	1.54	20	12/ 2/03	13:07	SP	calc.	8079
Percent Total Nitrogen	5.51		%	0.0100	1	12/ 5/03	17:28	SP	calc.	
Percent TKN as N	5.49		%	0.0914	20	12/ 2/03	13:07	SP	CE3-201/351.2	8073

Results have been corrected for dry weight.

Sample report continued . . .

Apr 27 2004 10:56am

---

Last Fax

<u>Date</u>	<u>Time</u>	<u>Type</u>	<u>Identification</u>	<u>Duration</u>	<u>Pages</u>	<u>Result</u>
Apr 27	10:53am	Sent	814078961822	2:34	8	OK

---

Result:

OK - black and white fax  
Okay color - color fax

*Lockett & Blair, P.A.*

Attorneys and Counselors At Law

Jerri A. Blair  
Attorney at Law

351 W. Alfred St.  
P.O. Box 130  
Tavares, FL 32778-0130  
(352) 343-3755  
(352) 343-5301 fax

Jerry T. Lockett  
Retired Circuit Judge

April 28, 2004

Chuck Jett  
Superintendent  
Sumter County Public Works  
Solid Waste Facility  
P.O. Box 1066  
Bushnell, FL 33513

Dear Mr. Jett:

Enclosed is a copy of the City's most recent annual residual report which indicates that the City is producing sludge with a pathogen reduction Class B classification. The City's application filed with the Department of Environmental Protection indicates that it will be producing sludge at a Class B level. I have also enclosed a copy of my letter to the Department of Environmental Protection concerning this issue.

Respectfully yours,



Jerri A. Blair

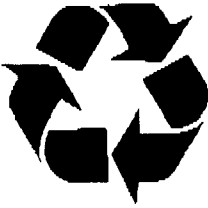
JAB/vgv

Enclosures

cc: Tommy Hurst  
Pete Burghardt  
Mayor Ed Wolf  
James R. Stevens  
Ron Ferland  
Vince Ruano  
Pete Bennett

ww#12

A:\CORRESP\jett.1.wpd



P. O. Box 1066  
Bushnell, FL 33513  
(352) 793-3368  
(352) 568-0166 Fax

*Sumter Co  
Compost  
permit*

## Sumter County Solid Waste

### Fax

To: Susan Pelz

From: Chuck Jett

Fax:

Pages: 1

Re:

Cc:

☐ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle

Dear Susan:

I am sending the information you requested on the oil company who services our facility.

The company is Atlantic Industrial Services, Inc. The address is 359 Cypress Rd. Ocala, FL 34472.

The phone number is 800-328-8252.

FED. EPA I.D. # is FLR000060301.

They also have a web site, it is [www.usedoil.com](http://www.usedoil.com).

If you have need for more information, please give me a call.

Thanks,

Chuck Jett

Sumter County Solid Waste Superintendent

Chuck Jett, Solid Waste Superintendent



**Atlantic**  
Industrial Services, Inc.

**A Quality, Cost Effective Environmental Firm**

Atlantic Industrial Services, Inc. is an environmental firm offering quality, cost effective options to meet the ever-expanding environmental protection needs of our customers.



SERVICES ENVIRONMENTAL HEALTH & SAFETY NEWS CAREERS CONTACT US

Atlantic Industrial Services, Inc. is an environmental firm offering quality, cost effective options to meet the ever-expanding environmental protection needs of our customers.

Our company's ability to provide the highest quality of service in the industry makes AISI the best choice to assist your organization in a variety of matters including used oil management, used oil filter recycling, used antifreeze recycling, fuel services and industrial waste water disposal.

Learn more about Atlantic Industrial Services by visiting our [Services](#) section.

#### Employee Login

Username:

Password:

Login >

New users please  
register [here](#)

© Copyright 2003 Atlantic Industrial Services



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

**CERTIFIED MAIL 7001 1680 0006 6133 5124**  
**RETURN RECEIPT REQUESTED**

April 30, 2004

In the matter of an  
Application for Permit by:

**DEP File No. 126940-010-SO**  
Sumter County

Sumter County Public Works Department  
Mr. Benard Dew, County Manager  
209 N. Florida Avenue  
Bushnell, Florida 33513

## **NOTICE OF PERMIT**

Enclosed is Permit Number **126940-010-SO**, issued pursuant to  
Section(s) 403.087(1), Florida Statutes.

A person whose substantial interests are affected by this transfer of permits may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, 3900 Commonwealth Blvd., MS#35, Tallahassee, 32399-3000, within fourteen (14) days of receipt of this notice. 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 fourteen (14) days shall constitute a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes.

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 Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of 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 Petitioner, if any;
- (e) A statement of facts which petitioner contends warrants reversal or modification of the Department's action or proposed action;

*"More Protection, Less Process"*

PERMITTEE: Sumter County Public Works Dept.  
Mr. Bernard Dew, County Manager

PERMIT NO.: 126940-010-SO  
Composting Facility-Operation

- (f) A statement of which rules or statutes petitioner contends warrant reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action 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 notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication 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.

This permit 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 Rules 62-110 and 28-106, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit 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, Florida Statutes, 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., MS#35, Tallahassee, 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.

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
OFFICIAL USE	
Postage \$	Mailed 4-30-04 Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage	
Sent To	
Street, Apt. No. or PO Box No.	
City, State, ZIP	
PS Form 3800, June 2002	

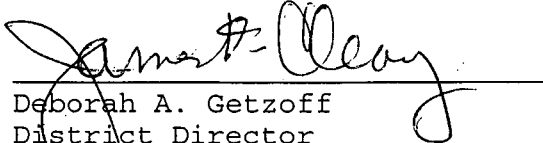
Mr. Bernard Dew, County Adm.  
Sumter County BCC  
209 North Florida Street  
Bushnell, FL 33513

PERMITTEE: Sumter County Public Works Dept.  
Mr. Bernard Dew, County Manager

PERMIT NO.: 126940-010-SO  
Composting Facility-Operation

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
Deborah A. Getzoff  
District Director  
Southwest District

DAG/sgm

Attachment

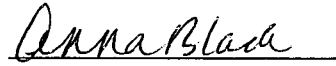
Copies furnished to:

Sumter County Elected Officials Notification  
David Springstead, P.E., Springstead Engineering 727 South 14<sup>th</sup> Street,  
Leesburg, Fl. 34748  
Virginia Watson, Sumter County, 209 N. Florida Street, Bushnell, Florida  
33513  
Francine Joyal, FDEP Tallahassee  
Susan Pelz, P.E., FDEP Tampa  
Douglas Beason, OGC Tallahassee  
(Permit Notebook)

CERTIFICATE OF SERVICE

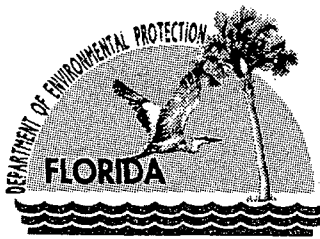
This undersigned duly designated deputy clerk hereby certifies  
that this NOTICE OF PERMIT and all copies were mailed before the close  
of business on April 30, 2004 to the listed persons.  
(date stamp)

FILING AND ACKNOWLEDGMENT  
FILED, on this date, pursuant  
to Section 120.52(10), Florida  
Statutes, with the designated  
Department, Clerk, receipt of  
which is hereby acknowledged.

  
Clerk

4/30/04  
Date





# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

## PERMITTEE

Sumter County Public Works Dept.  
Mr. Bernard Dew, County Manager  
209 N. Florida Ave.  
Bushnell, Florida 33513

## PERMIT/CERTIFICATION

WACS ID No: SWD-60-53088  
Permit No: **126940-010-SO**  
Date of Issue: **04/30/2004**  
Expiration Date: **05/01/2009**  
County: Sumter  
Lat/Long: 28°44'36"  
82°05'19"  
Sec/Town/Rge: 15/20S/22E  
Project: Sumter County  
Composting Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-520, 62-522, 62-550, 62-701, and 62-709, F.A.C.. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To **operate** a solid waste Composting Facility (approximately 88 tons/day in Digester #1 and 121 tons/day in Digester #2), referred to as the Sumter County Solid Waste Management (Composting) Facility, subject to the specific and general conditions attached, for materials recovery, sorting and recycling, located 1 mile east of Interstate 75, along the south side of C.R. 470, north of Bushnell, Sumter County, Florida. The specific conditions attached are for the **operation** of:

### 1. Composting Facility

**Replaces Permits Number: 126940-001-SO, 126940-002-SC, and 126940-006-SC and modifications dated 6-18-98 and 10-22-98.**

This permit contains compliance items summarized in **Attachment 1** that shall be complied with and submitted to the Department by the dates noted. If the compliance dates are not met and submittals are not received by the Department on the dates noted, enforcement action may be initiated to assure compliance with the conditions of this permit.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.161, 403.727, or 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of rights, nor any infringement of federal, State, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under conditions of the permit;

**GENERAL CONDITIONS:**

(General Condition #7. cont.)

(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of noncompliance; and

(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 62-730.300, Florida Administrative Code, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

**GENERAL CONDITIONS:**

13. This permit also constitutes:
  - (a) Determination of Best Available Control Technology (BACT)
  - (b) Determination of Prevention of Significant Deterioration (PSD)
  - (c) Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
  - (d) Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
  - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    1. the date, exact place, and time of sampling or measurements;
    2. the person responsible for performing the sampling or measurements;
    3. the dates analyses were performed;
    4. the person responsible for performing the analyses;
    5. the analytical techniques or methods used;
    6. the results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. **Facility Designation.** This site shall be classified as a solid waste management facility for composting of solid waste materials and shall be constructed and operated in accordance with all applicable requirements of Chapters 62-3, 62-4, 62-330, 62-520, 62-522, 62-550, 62-701, and 62-709, Florida Administrative Code (F.A.C.) and all applicable requirements of Department Rules.

2. **Permit Application Documentation.** This permit is valid for operation of the composting facility (finishing building, digester, and related facilities) in accordance with the reports, plans and other information, submitted by **Springstead Engineering, Inc.**, as follows:

a. Application for Permit to Construct or Operate a Solid Waste Management Facility for the Production of Compost, dated February 21, 2003 (received February 24, 2003);

b. Response to request for additional information, dated October 7, 2003 (received October 9, 2003);

c. Response to request for additional information, dated January 30, 2004 (received February 2, 2004);

d. Additional information dated April 19, 2004 (received April 20, 2004);

e. Bedminster Digester System Operation and Maintenance Manual, dated January 13, 1997 (received February 24, 1997);

f. "Maintenance and Repair of BioMixers", A-C Equipment Services, received October 9, 2003.

g. Plan Sheets titled, Sumter County Solid Waste Management Facility MSW Compost Digester, signed and sealed December 24, 1996, including the following revised sheets:

- 1) Sheet 5 of 5 received February 18, 1997;
- 2) Sheet SUM EL01 received February 18, 1997;

h. Certification of Construction Completion, "Digester No.2 and Infeed/Discharge" dated January 29, 2004 (received January 30, 2004) including the following supporting information:

- 1) September 30, 2002 "Notice of Final Acceptance" letter from A-C Equipment Services to Sumter County;
- 2) December 18, 2003 "Confirmation of Construction of Digester" letter from A-C Equipment Services to Sumter County;

**SPECIFIC CONDITIONS:**

(Specific Condition #2.h., cont'd)

- 3) Plan Sheets titled, Installation & Assembly Drawings for 14'-0" I.D. x 185'-0" LG Rotary Biomixer (Plan Sheets Nos. 69-2120, 69-2121, 69-2127A, 69-4110B, 69-4133 through 69-1338, 69-4146A, 69-4146B, 69-4148, 69-4149, 69-4152A, 69-4154A, 69-4154B, 69-4155, 69-4157, 69-4158A, 69-4159A, 69-4160A, 69-4161A, 69-4162A, 69-4163, 69-4164, and 69-4167), prepared by A-C Equipment Services, received January 30, 2004;
- 4) Record Drawings titled, Sumter County Board of County Commissioners, F.O.R.C.E. Solid Waste Digester II, (Sheets 1 of 2 and 2 of 2), signed and sealed January 29, 2004 (received January 30, 2004);
- 5) Record Drawing titled, Sumter County Board of County Commissioners, Force, Infeed/Discharge Plan, signed and sealed January 29, 2004 (received January 30, 2004);
- 6) Record Drawings titled, Sumter County Board of County Commissioners, Composting Finishing Building Second Digester Bay Addition (Sheets 1 of 2 and 2 of 2), signed and sealed January 29, 2004 (received January 30, 2004);
- i. Plan Sheet titled, Sumter County Board of County Commissioners, Sumter County Composting Facility, Overall Site Plan, dated January 12, 2004 (received February 2, 2004);
- j. Plan Sheet titled, Sumter County Board of County Commissioners, Composting Building, Floor Plan, (Sheet 3 of 7) dated October 24, 1997 (received October 9, 2003);
- k. Plan Sheet titled, Sumter County Board of County Commissioners, Composting Building 2, Floor Plan, (Sheet 3 of 7) dated August 24, 1999 (received October 9, 2003);
- l. Engineering Report for Renewal of Operation Permits Sumter County Recycling, Processing, and Composting Facility Sunterville, Sumter County, Florida, revised April 2004 (received April 20, 2004);
- m. Sumter County Solid Waste Facility Operations Manual, revised January 2004 (received January 30, 2004), with revisions received April 20, 2004;
- n. 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);

and in accordance with all applicable requirements of Department rules, and

**SPECIFIC CONDITIONS:**

**3. Permit Modifications.**

a. This permit is valid for the operation of the finishing building, Digester #2, and related appurtenances (e.g. biofilter and scrubber). This permit authorizes the operation of Digester #1 only after the requirements of Specific Condition #7.a. have been completed and approved by the Department.

b. This permit does not authorize the management of waste tires, used oil or other special wastes (e.g. white goods, scrap metal) at the site. The management of these materials requires a separate permit.

c. Any construction, operation, or activities subject to Department Solid Waste regulations not previously approved as part of this permit shall require a separate Department permit unless the Department determines a permit modification to be more appropriate, or unless otherwise approved in writing by the Department. Permits shall be modified in accordance with the requirements of Rule 62-4.080, F.A.C. A modification, which is reasonably expected to lead to substantially different environmental impacts, which require a detailed review by the Department, is considered a substantial modification.

**4. Permit Renewal.** No later than **one hundred eighty (180) days** before the expiration of the Department Permit, the permittee shall apply for a renewal of a permit on forms and in a manner prescribed by the Department, in order to assure conformance with all applicable Department rules. Permits shall be renewed at least every five years as required by Rule 62-4.090, F.A.C. Operation permit renewal shall include, but not be limited to, an updated Operation Plan, Site Plans for existing site conditions, and revised (not inflation-adjusted) financial assurance cost estimates.

**5. Certification of Construction Completeness.** Within **thirty (30) days** after any specified construction has been completed (including construction associated with corrective actions to be conducted under Consent Order OGC Case #04-0131) and prior to operation, the following activities shall be completed and approved by the Department:

a. The owner or operator shall submit a Certification of Construction Completion, Form 62-701.900(2) (attached), signed and sealed by the professional engineer in charge of construction to the Department for approval, and shall arrange for Department representatives to inspect the construction in the company of the facility operator.

b. The owner or operator shall submit Record Drawings showing all changes (i.e. additions, deletions, revisions to the plans previously approved by the Department including site grades and elevations).

**SPECIFIC CONDITIONS:**

(Specific Condition #5., cont'd)

c. The owner or operator shall submit a narrative indicating all changes in plans and the cause of the deviations, and certification by the engineer of record to the Department.

d. The Record Documents shall include as-built surveys that demonstrate that construction has been completed at designed elevations and/or slopes, or as otherwise approved by the Department.

6. **Prohibitions.** The prohibitions of 62-701.300, F.A.C., shall not be violated at this site.

**7. Facility Operation Requirements.**

a. Composting of materials in Digester #1 shall not be resumed until:

1) A written detailed notification and description of the specific damage to Digester #1 and a specific a plan for corrective actions has been submitted to the Department for review and approval within **30 days** of permit issuance; and

2) Certification of construction completion for repairs to Digester #1 as specified by the approved plan for corrective action submitted under Specific Condition #7.a.(1) above, including the information required in accordance with Specific Condition #5. above, is submitted to and approved by the Department.

b. The permittee shall operate this facility in accordance with Chapter 62-709, F.A.C.; the information and drawings as listed in Specific Condition #2 above; the Operations Manual referenced in Specific Condition #2.m. above; and any other applicable requirements.

c. Waste or leachate shall not be stored in the "lined emergency storage cell."

d. Each finishing building floor (buildings #1 and #2) shall be sloped to the center as shown on the Compost Building Floor Plan plan sheets referenced in Specific Conditions #2.j. and 2.k. above. In the event that liquids accumulate on the floor, the liquids shall be removed by the end of the working day. These liquids may be placed back on the compost piles, may be removed for offsite disposal, or may be disposed of in another appropriate manner, as approved by the Department.

e. Litter shall be collected at least once daily.



**SPECIFIC CONDITIONS:**

(Specific Condition #7., cont'd)

f. In the event of extended downtime (greater than 72 hours) of equipment, or other emergency conditions, additional feedstock materials shall not be placed in the digester system until equipment is operable, or in the case of an emergency, the emergency condition has ceased. In the event that the storage areas for the feedstock are at capacity, the additional feedstock materials shall be removed to an appropriate off-site disposal facility.

g. In order to minimize the potential for explosions and fires, explosive items (e.g. fireworks, ammunition, certain aerosol cans) shall be removed from the waste stream prior to processing in the digester unit.

h. All processed and unprocessed waste materials and compost additives shall be unloaded inside the building or into trucks or containers on paved areas within leachate containment. Spillage inside the building from the loading, unloading or sampling activities shall be cleaned up at the end of each business day. Spillage in the digester discharge area shall be cleaned up **immediately** upon completion of the loading, unloading or sampling activity (prior to continuing with other facility operations).

i. Leakage of fuels, oil, grease, other lubricants or fluids, from the digester equipment that is discharged to soils outside the building, or leachate collection system, shall be cleaned up **immediately** upon discovery (prior to continuing with other facility operations) and stored in a covered container for off-site disposal.

j. Dust shall be controlled at the facility to prevent potential fire hazards and nuisances.

k. Materials shall remain a minimum of 72 hours in the digester unit, at a minimum temperature of 141° F. (55° C.), with a target moisture content of 55% by weight, unless the permittee demonstrates that a reduced time period does not adversely affect the effectiveness of the composting process. The permittee may request Department approval of temporary reductions in the residence time for experimental purposes.

l. Composted materials, which utilize different feedstocks and additives, shall be cured, finished and stored in separate piles. These materials may be mixed or commingled after the finished compost analyses are received and the analyses demonstrate that the piles are the same classification of compost (pursuant to Rule 62-709.550, F.A.C.).

m. All domestic wastewater residuals received, stored, and utilized as a compost additive shall be classified as "Class A residuals", "Class AA residuals", or "Class B residuals", as defined by Rules 62-640.200 (8) through (10), F.A.C. respectively.

**SPECIFIC CONDITIONS:**

(Specific Condition #7., cont'd)

n. Compost which is produced from feedstocks that include domestic wastewater residuals shall meet the ceiling concentration limits listed in 40 CFR 503.13.

o. All compost additives (e.g. domestic wastewater residuals/sludge, animal manure, urea, lime, etc.) shall be stored in covered leakproof containers, or under roof in areas with leachate collection. Additives shall not be stored for greater than **ninety (90) days**. Additives shall be managed and stored in a manner that sufficiently controls odors or vectors.

p. The number, size, location and orientation of the windrows in the finishing building shall be in accordance with the window configuration as shown on the Compost Building Floor Plan plan sheets referenced in Specific Conditions #2.j. and 2.k. above.

q. Final screening of compost material shall be conducted inside the main finishing building or "lean to" portion of the building.

r. Finished compost materials shall be sampled and analyzed in accordance with Specific Condition #11.a. below. Finished compost for which test results have not been received, shall be stored separate from other materials (e.g. unfinished compost, residuals, etc.) until the test results are received. Finished compost, which is classified Types A, B and C may be stored on the outside asphalt pads after the test results are received, but each type shall be stored separately.

s. The outside asphalt pads shall not be used for composting without prior Department approval. The pads may only be used for storage of finished compost [ref.SC#2.l.page 3].

**8. Effectiveness of Pathogen Destruction in Digester**

a. The facility shall demonstrate the effectiveness of each digester in the destruction of pathogens in accordance with Rule 62-701.200(34), F.A.C. and/or Department Guidance Memo #SWM-01.9 (copy attached) as follows:

1) Composite samples of the unfinished compost material shall be sampled at the discharge point of Digester #2 **quarterly for at least one year from permit issuance** (to start during the Quarter 2, 2004 quarterly finished compost sampling event) in accordance with Specific Condition #11.b. below.

2) Composite samples of unfinished compost material shall be sampled at the discharge point of Digester #1 **quarterly for at least one year from resuming operation of Digester #1** (to start during the next scheduled finished compost sampling event following resumption of operation of Digester #1) in accordance with Specific Condition #11.b. below.

**SPECIFIC CONDITIONS:**

(Specific Condition #8.a., cont'd)

3) An evaluation of the effectiveness of Digester #2 in the destruction of pathogens shall be submitted **by August 1, 2005**. This evaluation shall include a summary of the sampling and analytical results for the compost testing conducted in accordance with Specific Condition # 8.a.(1) above. Based on these results, this evaluation shall determine the appropriate frequency for subsequent routine sampling events (or discontinuance of sampling) and evaluate the adequacy of the permitted residence time and temperature in Digester #2 for destruction of pathogens in accordance with Rule 62-701.200(34), F.A.C. and/or Department Guidance Memo #SWM-01.9. The evaluation shall be sent to: Solid Waste Section, Department of Environmental Protection, Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-1352.

4) An evaluation of the effectiveness of Digester #1 in the destruction of pathogens shall be submitted **within 30 days of completion** of the sampling and analysis required in accordance with Specific Condition 8.a.(2) above. This evaluation shall include a summary of the sampling and analytical results for the compost testing conducted in accordance with Specific Condition # 8.a.(2) above. Based on these results, this evaluation shall determine the appropriate frequency for subsequent routine sampling events (or discontinuance of sampling) and evaluate the adequacy of the permitted residence time and temperature in Digester #1 for destruction of pathogens in accordance with Rule 62-701.200(34), F.A.C. and/or Department Guidance Memo #SWM-01.9. The evaluation shall be sent to: Solid Waste Section, Department of Environmental Protection, Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-1352.

5) The testing and analysis required by Specific Condition 11.b. below shall be continued beyond the initial one year unless otherwise approved by the Department.

**9. Scrubber and Biofilter.**

a. At a minimum, the biofilter media shall be regenerated or replaced, **annually, by June 15th each year**, unless the permittee provides documentation to the Department that demonstrates that the biofilter efficiency has not significantly decreased for the previous year.

b. The temperature of the air flow to the biofilter, the back pressure to the biofilter, and the biofilter bed depth shall be monitored to evaluate the efficiency of the unit.

**SPECIFIC CONDITIONS:**

(Specific Condition #9., cont'd)

c. Liquids which discharge from the scrubber shall be recirculated into the digester system, discharged to the leachate management system at the site, or removed for off-site disposal at a permitted wastewater treatment facility.

d. Liquids which discharge from the scrubber shall be sampled and analyzed to adequately demonstrate that the liquids are not a hazardous waste, and to monitor the effectiveness of the scrubber unit. The quality of the air flow to the scrubber and out of the scrubber shall be monitored to allow for the evaluation of the effectiveness of the scrubber unit.

**10. Operation Plan and Operating Record.**

a. Each facility owner or operator shall have an operational plan that meets the requirements of Rule 62-709.500(5), F.A.C. A copy of the Department approved permit, operational plan, construction reports and record drawings, and supporting information shall be kept at the facility at all times for reference and inspection. Operating records as required by Rule 62-709.530, F.A.C. are part of the operations plan, and shall also be maintained at the site.

b. Unless specified otherwise in this permit, all submittals, notifications, or requests for permit modification shall be provided to the Southwest District Solid Waste Section, 3804 Coconut Palm Drive, Tampa, Florida 33619.

c. Proposed changes to the current Department approved Operational Manual, referenced in Specific Condition 2.m. above shall be submitted in writing to the Department for review and may require a permit modification in accordance with Specific Condition #3. The Operational Manual shall be updated as operations change and for renewal of the permit. Revised pages shall be provided as replacement pages with revisions noted (deletions may be struckthrough [~~struckthrough~~] and additions may be shaded [shaded] or a similar method may be used) and each page numbered with the document title and date of revision.

**SPECIFIC CONDITIONS:**

**11. Compost Sampling.**

a. A composite sample of finished compost materials produces shall be sampled at **intervals of every 20,000 tons of compost produced or quarterly**, whichever occurs first, for analysis of the following parameters:

Parameter	Units	Method
Moisture	%	EPA 160.3
Total Nitrogen	% dry weight	EPA 351 and 353
Total Potassium	% dry weight	EPA 365
Total Potassium	% dry weight	EPA 3050/7610
Reduction in Organic Matter	%	EPA 160.4
Organic Matter	%	EPA 160.4
pH	standard units	EPA 9045
Foreign Matter	%	Rule 62-709.530(1)(f), F.A.C.
Arsenic	mg/kg dry weight	EPA 3050/7060
Cadmium	mg/kg dry weight	EPA 3050/7130
Copper	mg/kg dry weight	EPA 3050/7210
Lead	mg/kg dry weight	EPA 3050/7420
Mercury	mg/kg dry weight	EPA 3051/7471
Molybdenum	mg/kg dry weight	EPA 3050/7480
Nickel	mg/kg dry weight	EPA 3050/7520
Selenium	mg/kg dry weight	EPA 3050/7740
Zinc	mg/kg dry weight	EPA 3050/7950
Fecal Coliform	most probable number per gram volatile suspended solids (MPN/gm. VSS)	SM 908
	or	
	most probable number per gram total solids (MPN/gm. TS)	EPA 9221E or 9222D

b. A composite sample of the unfinished compost material at the discharge point of each digester shall be sampled **quarterly for at least one year**, for analysis of the following parameters:

Parameter	Units	Method
Moisture	%	EPA 160.3
Total Nitrogen	% dry weight	EPA 351 and 353
Total Potassium	% dry weight	EPA 365
Total Potassium	% dry weight	EPA 3050/7610
Reduction in Organic Matter	%	EPA 160.4
Organic Matter	%	EPA 160.4
pH	standard units	EPA 9045
Foreign Matter	%	Rule 62-709.530(1)(f), F.A.C.
Arsenic	mg/kg dry weight	EPA 3050/7060
Cadmium	mg/kg dry weight	EPA 3050/7130
Copper	mg/kg dry weight	EPA 3050/7210
Lead	mg/kg dry weight	EPA 3050/7420
Mercury	mg/kg dry weight	EPA 3051/7471
Molybdenum	mg/kg dry weight	EPA 3050/7480
Nickel	mg/kg dry weight	EPA 3050/7520
Selenium	mg/kg dry weight	EPA 3050/7740
Zinc	mg/kg dry weight	EPA 3050/7950
Fecal Coliform	most probable number per gram volatile suspended solids (MPN/gm. VSS)	SM 908
	or	
	most probable number per gram total solids (MPN/gm. TS)	EPA 9221E or 9222D

**SPECIFIC CONDITIONS:**

**12. Recordkeeping and Reporting.**

a. Unless otherwise specified, all records shall be maintained at the facility and copies provided to the Department upon request.

b. The owner or operator of the composting facility shall record, in tons (and cubic yards) per day, the amount of each material inputted into and removed from the digester system.

c. The owner or operator of the composting facility shall maintain documentation of the following information regarding domestic wastewater residuals received, stored, and utilized at the composting facility:

- 1) The wastewater treatment plant source for each load received;
- 2) The quantity, in tons (and cubic yards) of each load received and;
- 3) Documentation from the wastewater treatment plant source that specifies the residual classification (e.g. Class B, A, or AA) of each load, including supporting information utilized in determination of the classification.

d. The permittee shall maintain records on the quantity (tons and cubic yards) of material placed in windrows in the finishing building, the quantity of finished compost produced, and the length of time required to finish the compost.

e. The following information shall be recorded daily, compiled **monthly**, and submitted to the Department **quarterly**:

- 1) The quantity, in tons (and cubic yards) of each additive and feedstock material which are input into the digester, the quantity of materials removed from the digester, and the residual classification, if applicable. This information may be based on the average daily quantity for each month.
- 2) The total quantity (gallons) of make-up water, leachate, recirculated liquids or other liquids added to the digester system.
- 3) Moisture content and temperature reading results from each sampling port of the digester unit.
- 4) Which combination of air pollution control units were utilized, i.e. scrubber, biofilter.

**SPECIFIC CONDITIONS:**

(Specific Condition #12., cont'd)

f. The following information shall be submitted to the Department **quarterly**:

- 1) Analytical results for:
  - a) Scrubber discharge water;
  - b) Scrubber air discharge;
  - c) Finished compost; and
  - d) Unfinished compost at digester discharge points.
- 2) Average residence time for material in the digester each month.
- 3) Quantity of finished compost.

g. Reporting required by Specific Conditions #12.c. through f., above, shall be in accordance with the following schedule:

- 1) Activity from July 1st through September 30th, report due October 15th;
- 2) Activity from October 1st through December 31st, report due January 15th;
- 3) Activity from January 1st through March 31st, report due April 15th; and
- 4) Activity from April 1st through June 30th, report due July 15th.

**13. Monitoring of Waste.** The permittee shall not accept hazardous waste or any hazardous substance at this site. Hazardous wastes are wastes listed in 40 CFR 261 Subpart D as hazardous or are wastes characterized in 40 CFR 261 Subpart C as hazardous. Hazardous substances are those defined in Section 403.703, Florida Statute or in any other applicable state or federal law or administrative rule.

**14. Drainage Requirements.**

a. All areas shall be cleaned at the end of each day's operation, at a minimum, or as needed, to prevent odors and vectors. All washdown water shall be contained within the building(s) or leachate management system. Except for the center sump of the finishing buildings, floors shall be free of standing liquids. Materials in the finishing buildings (in-process, finished, in windrows, etc.) shall not be located in ponded water.

b. Except for discharges to the leachate management system, liquids shall not discharge from the digester system, finishing building, or feedstock storage areas at any time.

c. The "lean-to" portion of the finishing building shall be operated to prevent the accumulation of liquids in the digester discharge area. Liquids, which accumulate in this area, and have contacted waste, shall be managed as leachate.

**SPECIFIC CONDITIONS:**

15. **Closure Requirements.** The facility owner or operator shall notify the Department of the facility's closure, no later than **180 days prior** to the date when the facility is expected to close. The facility shall be closed in accordance with Rule 62-709.510(4), F.A.C.

16. **Financial Assurance.** Since the digester system is an integral part of the materials recovery facility (MRF) located at the site, the owner or operator shall provide financial assurance for this solid waste management facility, pursuant to Rules 62-4.110, and 62-701.710(7), F.A.C. The costs for loading, transportation and disposal of the maximum quantity of feedstock that may be at the facility at any time must be included with the financial assurance cost estimates for the MRF. All costs for closure and proof that the financial mechanism has been funded adequately shall be submitted **annually** shall be submitted in accordance with **Permit Number 126941-003-SO, Specific Condition #13**, or its successors.

17. **Control of Nuisance Conditions.**

a. The operating authority shall be responsible for the control of odors and fugitive particulates (dust) arising from this operation. Such control shall minimize the creation of nuisance conditions on adjoining property. Complaints received from the general public, and confirmed by Department personnel upon site inspection, shall constitute a nuisance condition, and the permittee must take immediate corrective action to abate the nuisance. The owner or operator shall control disease vectors so as to protect the public health and welfare.

b. To reduce the potential for the offsite migration of objectionable odors, the owner or operator shall:

1) Operate and maintain the odor abatement control system specified in Specific Condition #2.n. above;

2) Operate and maintain the scrubber and biofilter system in accordance with Specific Condition #9 above;

c. In the event that the measures required by Specific Condition #17.b., above, do not sufficiently abate the objectionable odors offsite, the owner or operator shall submit an odor abatement plan to the Department for approval. This plan shall include, at a minimum, a description of the proposed corrective actions and a schedule for implementation.



**SPECIFIC CONDITIONS:**

**18. Facility Maintenance and Repair.**

a. The site shall be properly maintained including building maintenance, and maintenance of equipment, drainage systems, leachate collection and removal systems, and stormwater systems.

b. Except for minor equipment repairs and maintenance, in the event of the following occurrences, the permittee shall **immediately (within 24 hours)** notify the Department of Environmental Protection explaining such occurrence and remedial measures to be taken and time needed for repairs:

- 1) Damage to any portion of the site facilities;
- 2) Failure of any portion of the associated systems;
- 3) Emergency incidents such as fires or explosions;
- 4) Extended downtime (greater than 72 hours) for any component of the digester system.

c. Written detailed notification, including a plan for corrective actions, shall be submitted to the Department **within seven (7) days** following the occurrence.

d. Within 48 hours of use, the Department shall be notified of operation of the digester by-pass system. The Department shall also be notified when normal operations utilizing the digester resume.

**19. Stormwater System.** The site shall continue to have a stormwater management system operated and maintained to prevent surface water flow into waste processing and storage areas. The stormwater management system shall be operated and maintained in accordance with Chapter 62-330, F.A.C., and any other applicable Department or water management district rules.

**20. Fire Safety.**

a. **Annually**, the permittee shall arrange for a fire safety inspection by the local fire protection authorities. The inspection shall be conducted no later than **June 15th** each year. The fire safety inspection report, which includes a statement from the local protection authorities that the site meets the requirements of the local fire protection authorities, shall be maintained at the facility for five years, and copies shall be provided to the Department upon request.

b. In the event that deficiencies are noted, **within 30 days** of completion, the permittee shall provide documentation to the Department indicating correction of any deficiencies noted in the annual Fire Safety Survey. The documentation shall include approval of the corrections by the local fire authority.

PERMITTEE: Sumter County Public Works Dept.  
Mr. Bernard Dew, County Manager

PERMIT NO.: 126940-010-SO  
Composting Facility-Operation

**SPECIFIC CONDITIONS:**

21. **Professional Certification.** Where required by Chapter 471 (P.E.) or Chapter 492 (P.G.), Florida Statutes, applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.


22. **General Conditions.** The permittee shall be aware of and operate under the "General Conditions". General Conditions are binding upon the permittee and enforceable pursuant to Chapter 403, Florida Statutes.

23. **Permit Acceptance.** By acceptance of this Permit, the Permittee certifies that he/she has read and understands the obligations imposed by the Specific and General Conditions contained herein and also including date of permit expiration and renewal deadlines. It is a violation of this permit for failure to comply with all conditions and deadlines.

24. **Regulations.** Chapter 62-709, F.A.C. (effective 10-22-00), and Chapter 62-701, F.A.C. (effective 5-27-01), are incorporated into this permit by reference. The permittee shall comply with all applicable requirements of Department rules.

Executed in Tampa, Florida

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
Deborah A. Getzoff  
District Director  
Southwest District

ATTACHMENT 1

SPECIFIC CONDITION	SUBMITTAL DUE DATE	REQUIRED ITEM
4.	180 days prior to permit expiration (November 1, 2008)	Permit Renewal Application
5.a., 5.b., 5.c., 5.d.	Within 30 days of completion of construction	Certification of Construction Completion submitted; Record Drawings submitted
7.a.1)	June 1, 2004	Report on damage to Digester #1 and corrective action plan
8.a.3)	August 1, 2005	Report of pathogen reduction effectiveness of Digester #2
9.a.	Annually, by June 15 <sup>th</sup> each year	Regenerate biofilter media
12.e., 12.f., 12.g.	Quarterly, by October 15th, January 15th, April 15th, and July 15th	Waste quantity reports, analytical results
13.	180 days prior to date of final material acceptance	Closure notification
16.	Annually	Revised financial assurance cost estimates, proof that financial mechanism is adequately funded
18.b.	Within 24 hours, of occurrence	Notification of failure of systems
18.c.	Within 7 days, of occurrence	Written notification & description of corrective actions
20.a.	Annually, by June 15th	Fire safety survey/inspection completed
20.b.	Within 30 days of completion	Documentation of approved completion of fire safety corrective actions

**Memorandum**

**Florida Department of  
Environmental Protection**

---

TO: District Waste Program Administrators

FROM: Richard B. Tedder, Program Administrator  
Solid Waste Section

Chris McGuire, Senior Assistant General Counsel  
Office of General Counsel

DATE: December 1, 2003

SUBJECT: Chapter 62-709 (Compost Rule) - Fecal Coliform Testing  
Memo # SWM-01.9

---

The definition of disinfection in Rule 62-701.200(34), Florida Administrative Code (F.A.C.), specifies that disinfection, as relates to composting, is the selective destruction of pathogens indicated by a reduction in indicator organisms to less than or equal to 100 fecal coliform Most Probable Number per gram of Volatile Suspended Solids (MPN/gram VSS). Rule 62-709.530(1)(c), F.A.C., specifies measuring fecal coliform as MPN/gram VSS using Test Method SM 908 found in "Standard Methods for the Examination of Water and Wastewater", 16<sup>th</sup> Edition, 1985. This value and test method were adopted into Chapter 62-709, F.A.C., when the Compost Rule was promulgated in 1989, and were based on the 1989 draft biosolids guidance and proposed federal regulations - 40 CFR Part 503.

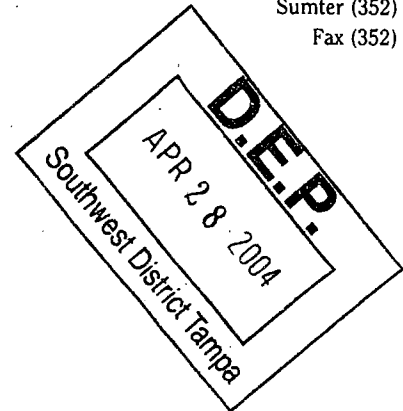
It has come to our attention that there is a more representative measurement available for pathogen evaluation, specifically, 1,000 Most Probable Number per gram Total Solids (MPN/gram TS) - dry weight, using Test Methods 9221 E or 9222 D contained in "Standard Methods for the Examination of Water and Wastewater", 18<sup>th</sup> Edition, 1992. This reflects the final 503 regulations adopted in 1993. The Department intends to amend the existing target value in Chapter 62-701, F.A.C., and the test method specified in Chapter 62-709, F.A.C., to parallel the biosolids requirements by adopting the 1,000 MPN/gram TS criteria.

It is Department policy that the results of the MPN per gram TS test will be accepted in lieu of the currently specified MPN/gram VSS should any permittee wish to use MPN/gram TS until Chapters 62-701 and 62-709, F.A.C., are amended to reflect this. However, permittees are still allowed to use the currently specified criteria and method if they so choose until such changes are adopted.



January 14, 2004

Mr. Steven G. Morgan  
Solid Waste Section  
Southwest District  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619



**Re: Financial Responsibility Request for Additional Information  
Sumter County Composting Processing & Recycling Facility  
Suttermerville, Sumter County, Florida  
SEI File No. 921100.020**

Dear Mr. Morgan:

Please find the responses to your questions regarding the financial responsibility of the above referenced facility below:

**Sections 62-701.710(2)(j) and 62-701.630(4)(c), F.A.C. Section 8, Financial Responsibility:** Please provide following additional information:

- a. Cost Estimate For Tipped Material: Please provide following additional information in regard to this section and revise accordingly:
  - 1) Please provide the calculations that support the assumptions of a maximum of 300 tons of waste on the tipping floor and a maximum of 300 tons in the digesters.
  - 1) The maximum volume of material on the tipping floor will be 300 tons. The material in the digesters consists of 3 days waste less the recovered materials plus the weight of the sludge and water added. This maximum weight of material in the digesters is estimated to be  $[(100+121)*3] = 663$  tons.
  - 2) Loading, hauling, and disposal costs for unfinished compost in the digester were included, but loading, hauling, and disposal costs for unfinished compost in the finishing building were not provided. Please revise the cost estimates to include costs for loading, hauling, and disposal of the maximum storage quantity of unfinished compost in the finishing building at the facility, along with supporting third party estimates.
  - 2) Based on record drawings for the building, the maximum volume of material in the finish building is 2,520 cubic yards. This is the volume used to calculate the disposal of material.
  - 3) Please provide a copy of the current third-party estimate that supports the stated \$57.35 per ton cost for loading, hauling, and disposal of Class I waste.

(REVISED 4/04)

- 3) **The 3<sup>rd</sup> party costs are attached. The current cost to haul and dispose class F materials has increased to \$60/ton.**
  - 4) Loading, hauling, and disposal costs for biosolids and leachate at the facility were not provided. Please revise the cost estimates to include costs for loading, hauling, and disposal of the maximum storage quantity of these wastes at the facility, along with supporting third party estimates.
  - 4) **The 3<sup>rd</sup> party costs to load, haul and dispose of leachate and biosolids was quoted by Shelley's Environmental. The written quote had not yet been received but will be forwarded to DEP.**
- b. Cost For Removal of All Recovered Materials: Please provide following additional information in regard to this section and revise accordingly:
- 1) Disposal costs for all recovered materials at the facility were not provided. Please revise the cost estimates to include costs for disposal of the maximum storage quantity of all recovered materials at the facility.
  - 1) **The 3<sup>rd</sup> party costs and revised closure cost information is attached. Loading and hauling has been figured for materials which have a value. Local hauling and disposal is figured for the remainder of the materials.**
  - 2) The lump sum load/haul/dispose costs provided from Town & Country Refuse, Inc. assumes disposal of construction & demolition debris and therefore is inconsistent with the disposal of "aluminum" or "glass containers". Please provide revised cost estimates to include costs for loading, hauling, and disposal of these items at an appropriate recycling or disposal facility.
  - 2) **The 3<sup>rd</sup> party costs and revised closure cost information for Class 1 disposal is attached.**
  - 3) Please provide a copy of the current third-party estimate that supports the stated \$11.30 per ton cost for loading and hauling of "Processed Materials", "Non-Processables", and "C&D Materials."
  - 3) **The information has been revised and the disposal cost is being determined using the \$60/ton cost for Class I waste.**
  - 4) Please provide a copy of the current third-party estimates that supports the stated "cost from vendor" to load, haul, and dispose of tires, lead-acid batteries, and used oil.
  - 4) **The 3<sup>rd</sup> party costs and revised closure cost information is attached.**
  - 5) Please provide a copy of the current third-party estimate that supports the stated \$45.00 per ton cost for loading and hauling of "White Goods" and "Yard Waste."
  - 5) **The 3<sup>rd</sup> party costs for white goods and revised closure cost information is attached.**
- c. Financial Assurance Cost Estimate Form: Please provide following additional information in regard to this form and revise accordingly:
- 1) The current groundwater monitoring plan provides for both quarterly and annual sampling of monitor wells. The form provides cost estimates for quarterly sampling only. Please explain this discrepancy and revise the estimate accordingly. Please provide a copy of the third-party laboratory quote that lists parameters, costs for QC samples, and reporting.

- 1) The 3<sup>rd</sup> party costs and revised closure cost information has been revised and is attached.
- 2) The unit cost estimates provided throughout the form reflect either no change or a decrease in the approved unit cost for long-term care activities from the facility's 1997 approved long-term care cost estimates. Please provide the calculations and current third-party estimates or references utilized to support and justify the provided estimates.
- 2) The 3<sup>rd</sup> party costs and revised closure cost information has been revised and is attached.

I trust this information meets your needs at this time. Should you have any questions or require additional information, please contact our office.

Very truly yours,  
Springstead Engineering, Inc.

 4/27/04  
David W. Springstead, P.E.  
Florida Registration No. 48229

DWS/jal

Attachments

cc: Tommy Hurst



**Springstead  
Engineering, Inc.**

Consulting Engineers – Architects – Planners – Surveyors

EB-0001723

AA-0002820

LB-0001723

727 South 14th Street  
Leesburg, Florida 34748

Lake (352) 787-1414

Sumter (352) 793-3639

Fax (352) 787-7221

April 19, 2004

Mr. Steve Morgan  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619



RE: Supplemental Information for Permit  
Sumter County Composting and Recycling Facility  
DEP Permit No. **126940-008-SC**  
Sumterville, Sumter County, Florida

Dear Mr. Morgan:

Based on our discussions in a meeting held Tuesday March 23, 2004, Sumter County would like to present this supplemental information for the Department to consider while reviewing the pending permit application.

The initial discussion concerned the capacity of the facility and the need to include transferring waste as a continuous process at the facility. We have revised the Operations plan to include this language. The facility can process 100 tons of tipped waste through the digesters. The current limiting process is the floor space in the finishing building. As additional finishing space is permitted, constructed and approved for operation, the limiting process at the facility will become the recyclables recovery line. An additional processing shift will double the capacity of the facility at that time. Due to current growth, the need to transfer will occur during the course of this permit. The interior ramp and current operational process will facilitate the transferring of waste. The information regarding the capacity of Digester No. 2 is attached as requested.

The next area of discussion focused on the need for material to spend 72 hours in the digester and what methodology would be used to determine how long the material has resided in the digester. After a lengthy discussion it was decided that the county would propose testing to be performed on material exiting the digester for a period of time after permit issuance to insure proper destruction of pathogens.

The revised application page indicating Mr. Bernard Dew as the facility contact person is attached as requested



The revised pages from the engineering report indicating that material will not be in the tube for 24 hours are attached.

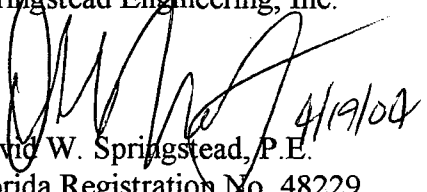
The revised Operations Plan discussing the transfer of waste and the operation of Digester 2 along with the other changes based on our discussions are attached.

Mr. John Morris' comments concerning the additional wells and locations for gas monitoring have been addressed and the revised monitoring plan evaluation is attached.

The Department's comments about the long term care and closure costs have been addressed in the revised comments. A revised estimate will follow.

We hope that this information meets your needs at this time. Please review this information and contact me if you have any questions.

Very truly yours,  
Springstead Engineering, Inc.

  
David W. Springstead, P.E.  
Florida Registration No. 48229

Attachments

cc: Bernard Dew - Sumter County  
Chuck Jett - Sumter County Solid Waste  
Mitch Kessler - Kessler Consulting, Inc.  
Miriam Zimms - Kessler Consulting, Inc.



**Springstead  
Engineering, Inc.**

Consulting Engineers – Architects – Planners – Surveyors

EB-0001723

AA-0002820

LB-0001723

727 South 14th Street  
Leesburg, Florida 34748

Lake (352) 787-1414

Sumter (352) 793-3639

Fax (352) 787-7221

TO: Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Date: January 29, 2004

Job No.: 921100.020

Attention: Mr. Steve Morgan

RE: Solid Waste, Composting, & Recycling Facility

**GENTLEMEN:**

WE ARE SENDING YOU ☒ Enclosed ☐ under separate cover via \_\_\_\_\_ the following items:

☐ Shop Drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications ☐ Facsimile

☐ Copy of Letter ☐ Change Order ☐ \_\_\_\_\_

Copies	Date	No.	Description
1			Response to Request for Additional Information (Signed & Sealed) Sumter County Composting, Processing, & Recycling Facility, Sumterville, Sumter County Pending Permit No.: 126940-010-SO – Composting Facility Pending Permit No.: 126941-003-SO – Material Processing Facility Pending Permit No.: 22926-003-SF – Closed Class I Long-Term Care
1			

**THESE ARE TRANSMITTED as checked below:**

☒ For Approval

☐ Approved as submitted

☐ Approved for payment

☐ For your use

☐ Approved as noted

☐ Resubmit \_\_\_\_ copies for approval

☐ As Requested

☐ Returned for corrections

☐ For Review and Comment

☐ \_\_\_\_\_

☐ Material and/or prints returned after loan to us

**REMARKS:**

**COPY TO:**

SC Public Works  
Chuck Jett, SC Landfill  
Kessler Consulting

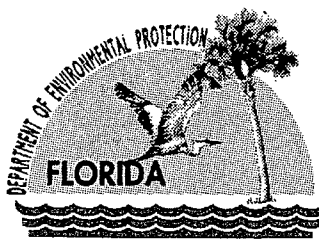
SIGNED: \_\_\_\_\_

*David W. Springstead, P.E.*

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

FEB - 2 2004

SOUTHWEST DISTRICT  
TAMPA



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

April 6, 2004

Mr. Bernard Dew  
Sumter County Administrator  
209 North Bushnell Street  
Bushnell, FL 33513

Re: Sumter County Closed Class I Landfill  
Long-term Care Permit Renewal, Pending Permit No. 22926-003-SF

Dear Mr. Dew:

This letter has been prepared to acknowledge that responses to the Department's letter dated November 7, 2003 that requested additional information regarding the application for renewal of the closure (long-term care) permit for the closed Class I landfill were received as follows:

Submittal from Central Testing Laboratory (CTL) report entitled "Gas Migration Study Report", prepared by Central Testing Laboratory (CTL), dated January 13, 2004, received January 14, 2004;

Submittal from Springstead Engineering, Inc. (SEI) dated January 30, 2004, received February 2, 2004, including:

- Section 1 -- Transmittal letter from SEI dated January 30, 2004 (15 pages, addressed to Steven G. Morgan);
- Section 2 -- DEP Form No. 62-701.900(1), Solid Waste Management Facility, revised pages 4, 5, 32, 33, 39;
- Section 3 -- *Engineering Report*, revised December 30, 2003;
  - Subsection entitled "Requirements of Section M"
  - Subsection entitled "Supplemental Information for Long Term Care"
  - Subsection entitled "Report of Effectiveness of Landfill Design"
  - Subsection entitled "General Maintenance for the Covered Areas of the Closed Class I Landfill"
- Section 4 -- *Sumter County Solid Waste Facility, Operations Manual*, revised January 30, 2004;
  - Subsection entitled "Section 5.0 -- Long Term Care"
  - Appendix F -- Monitoring Well Location Map, prepared by SEI, revised January 12, 2004
  - Appendix F -- Overall Site Plan, Sheet 1 of 1, prepared by SEI, revised January 12, 2004
- Section 5 -- Transmittal letter from SEI dated January 30, 2004 (6 pages, addressed to John R. Morris);
- Section 6 -- Transmittal letter from SEI dated January 14, 2004 (3 pages, addressed to Steven G. Morgan); and,

Submittal from CTL dated March 2, 2004, received March 4, 2004, transmitting revisions to the document entitled *Sumter County Ground Water Monitoring Plan Evaluation* (GWMPE), revised March 2, 2004.

This letter also constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes. It has been 403 days since your permit renewal application was initially received. The Department has requested additional information in writing on two occasions. Based on review of the referenced submittals, your application for permit renewal has been deemed to be complete and in accordance with Chapter 62-4, F.A.C., the Department must take agency action on the pending permit renewal by May 25, 2004.

The review comment numbers presented below are consistent with the Department's letter dated November 7, 2003 and summarize those items for which sufficient responses were not provided. To facilitate the review process, the comments for which responses were received that were considered to be complete and sufficient have been omitted from this letter. As discussed during the meeting conducted on March 23, 2004, submittal of supplemental information is requested for the following comments by April 16, 2004 to provide adequate time for review and development of appropriate permit conditions. In the event that no responses, untimely responses or insufficient responses to this letter are received, the Department may proceed with permit denial.

"More Protection, Less Process"

**DEP FORM NO. 62-701.900(1), SOLID WASTE MANAGEMENT FACILITY PERMIT FORM**

**Part M – Water Quality and Leachate Monitoring Requirements (Rule 62-701.510, F.A.C.)**

15. **M.1.c.(1):** Section 5 of the SEI submittal indicated that the figure entitled “Monitoring Well Map”, dated January 12, 2004, was revised to depict the edge of the former disposal areas and the distances from the edge of the waste units to the monitor wells. The response is not considered sufficient to address the review comment, as follows:

- Neither the SEI nor the CTL submittals provided a response to the review comment regarding the adequacy of the existing well locations to address the requirements of Rule 62-701.510(3), F.A.C., regarding the lateral distance from the detection wells to the edge of the disposal units. The figure entitled “Monitoring Well Map” indicates that existing wells MW-1 and MW-7 are 300 feet and 337 feet, respectively, from the edge of the landfill. These wells do not meet the location requirements of the cited rule for detection wells, and the replacement detection wells shall be required.
- The figure entitled “Monitoring Well Map” does not include the boundaries of Phases I, II and III within the landfill area as requested in the review comment.
- The reference on the application form to Section 2.0 of the GWMPE is not correct. The application form should reference Appendix F of the *Operations Manual*.

19. **M.1.c.(6):** Section 6.0 of the revised GWMPE (CTL submittal) referenced the construction details summary table as Appendix IX, however the table appears to be included in Appendix X. Section 6.0 of the revised GWMPE recommended replacement of well MW-2 to move it away from a high traffic area and to construct the well with 10 feet of screen and recommended replacement of wells MW-7 and MW-9 to construct each well with 10 feet of screen at a specified range of elevations. The response is not considered sufficient to address the review comment, as follows:

- The justification provided for the proposed top/bottom screen elevations for the replacements for wells MW-7 and MW-9 does not address the lithology encountered at the facility and the potential to breach the confining unit.
- Unique identification numbers were not provided for the replacement wells.
- The locations of the replacement detection wells were not described relative to the edge of the landfill and were not shown on a site map.

23. **M.1.h.(2): Bi-annual report requirements signed, dated and sealed by P.G. or P.E.**

(Rule 62-701.510.(9)(b), F.A.C.)

b. **GWMPE – Section 2.0:** Section 5 of the SEI submittal referred to the figure entitled “Monitoring Well Map” (provided in Appendix F of the *Operations Manual* in Section 4 of the SEI submittal), dated January 12, 2004. The response is not considered sufficient to address the review comment, as follows:

- The revised map does not include the location of the compost pads as requested in the review comment.

25. **O.2.: Provide documentation that will describe locations, construction details and procedures for monitoring gas at ambient monitoring points and with soil monitoring probes (Rule 62-701.530(2), F.A.C.)**

b. Section 5 of the SEI submittal referred to the figure entitled “Monitoring Well Map”, dated January 12, 2004 (provided in Appendix F of the *Operations Manual* in Section 4 of the SEI submittal) which included the locations of four gas probes (designated GP-1 through GP-4). The response is not considered to be sufficient to address the review comment for the following:

- The adequacy of the existing perimeter gas probes was not provided.
- No discussion of the proposed gas probe construction details was provided. The figure entitled “Typical Gas Monitoring Probe” (provided in Section 5 of the SEI submittal) indicated that the bottom elevation of the proposed gas probes shall be elevation 55 feet NGVD, however justification of this elevation and comparison of ground water elevations were not provided.

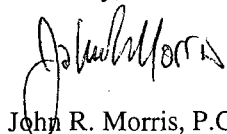
c. Section 5 of the SEI submittal did not include a response to this review comment which requested an evaluation of the ambient gas monitoring locations and did not provide a site map that located ambient gas monitoring locations within structures at the facility.

26. **P.2.b.(5):** Section 5 of the SEI submittal referenced revisions to Section 5.3 of the *Operations Manual* which were indicated to provide a description of procedures for conducting landfill gas monitoring (Section 5). It does not appear that this section of the *Operations Manual* was revised as indicated.

27. **P.3.d.:** Same as review comment No. 25.

The Department appreciates your assistance in addressing the sufficiency of the responses provided to the request for additional information regarding the pending permit renewal. Please contact me at 813-744-6100, extension 336, if you have questions about this letter.

Sincerely,



John R. Morris, P.G.  
Solid Waste Section

cc: David Springstead, P.E., Springstead Engineering, Inc., 727 So. 14<sup>th</sup> Street, Leesburg, FL 34748  
Ted Strouse, P.E., Central Testing Laboratories, Inc., 723 So. 14<sup>th</sup> Street, Leesburg, FL 34748  
Virginia Watson, Sumter County, 209 N. Florida Street, Bushnell, FL 33513  
Mitch Kessler, Kessler Consulting Inc., 14620 N. Nebraska Ave., Bldg. D, Tampa, FL 33613  
Susan Pelz, P.E., FDEP Tampa  
Steve Morgan, FDEP Tampa

3/23/04

## Permitting

lot info (compost, MRF) 2/2/04 decision by 5/1/04  
no more RATs, not necessarily sufficient  
need more info in next couple wks to be able to issue  
- may have to issue permits w/ conditions  
you may or may not like

## LTC permit -

GWMPE info rec'd 3/4/04

Application still insufficient

## Compost/MRF

### Waste Flow -

how much waste are you planning on taking in?  
what about by-passing?  
MRF is limited to 100 tpd

220	tipping floor
<del>200</del> tpd	
- 100 tpd	MRF (only 1 8hr shift)
- 120 tpd	by-pass

~~220 tpd tipping floor~~

actually running 75 tpd to MRF  $\Rightarrow$  50 tpd to digester  
limiting factor is finishing bldg (21 days on pad)

They will give us revised Op Plan that details transfer operation

What is capacity of new digester?

175 tpd max  $\begin{matrix} 100 \text{ waste} \\ 50 \text{ sludge} \\ 25 \text{ inductant} \end{matrix}$

don't know how much digester #2 will hold

they can weigh mat'l coming out of MRF (known volume, measure weight to get bulk density)

10% will be removed prior to 3 days

How do you tell you've taken 1 day's worth out?

~~measure~~

measure what's on finishing floor

time of discharge  $\Rightarrow$  conveyor speed know capacity of conveyor

Measure temperature & moisture - what are you trying to get - what temp & moisture?

Digester #1 -

need description & photos of failure

Existing topo -

we need proposed drainage plan & after renovation

we need as-built topo of all closed LF areas

## Application Form

LTC permit -

need ~~the~~ sealed copies

distance to wells -

intent of comment - wells need to be 50 ft  
from edge of waste

<sup>MW-1 & MW-7</sup>  
Are these well locations adequate for detection wells?

MW-1 & MW-7 don't abandon, will use for water levels  
discuss representativeness of data

<sup>MW-2 & MW-4</sup> part of CO  
active monitoring - we want wells in right  
locations, good construction, good sampling

need proposed well locations & construction details  
so we can incorporate in permit

CO & PCAP vs group

Address MW-2 & MW-4 in PCAP/CO  
later modify group based on results

maintain group as is - then revise based on result  
of CO (went through Jan summary & picked  
which bullets need to be done as part of permit  
& which part will be CO



## FINANCIAL ASSURANCE -

check qty #'s for digester material

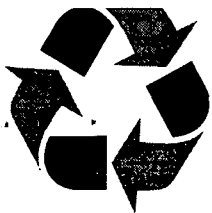
baled aluminum, steel cans, metals  $\Rightarrow$  recovered materials demonstration

used oil, white goods, special wastes must be included

gwtr monitoring - need 3<sup>rd</sup> party

MAINTENANCE of wells  $\Rightarrow$  replace / well / 5 yrs

MAINT. of cover  $\Rightarrow$  3<sup>rd</sup> party est.



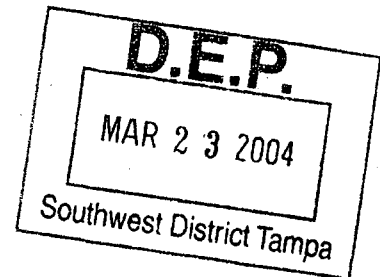
Stone FYI - Kelly

P.O. Box 1066  
Bushnell, FL 33513  
(352) 793-3368  
(352) 568- 0166 Fax

## Sumter County Solid Waste

March 19, 2004

Ms. Kelly Honey  
Environmental Specialist II  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619



Dear Ms. Honey:

This letter is in response to warning letter #274589 received from your office concerning hazardous waste program field inspections conducted on December 12, 2003 and February 5, 2004 at the Sumter County Solid Waste Facility. The violations were clearly defined and discussed with staff during the field inspections. I have also reviewed your list of recommended corrective action plans.

Below, you will be pleased to find that the Sumter County Solid Waste Facility has worked diligently to make necessary corrections to the violations defined by DEP.

**40CFR 279.22 (C) (1):** New decals clearly labeled "used oil only" have been ordered for all tanks used for waste oil storage.

**403.708 (1) (a), FS:** The waste oil tank has been relocated to the new concrete containment area at the citizens drop-off area. The diesel tank and trailer have been cleaned and removed from service and will not be used in the operation. The asphalt and all stained soil at the waste oil and fuel location have been removed and placed at the sludge storage area to go into the digester. We have brought in Central Testing and taken soil samples from the described areas in the excavated hole. All test results will be immediately forwarded to DEP as soon as we receive them.

**62-737.400 (5) (a), FAC:** All spent florescent bulbs will be stored in properly marked boxes, and extra effort will be placed on keeping these boxes closed. Also, please note that April 3, 2004 has been slated for Amnesty day. All properly stored household hazardous waste will be disposed of at this time.

If I can be of any further assistance in obtaining full compliance with the DEP in our quest for permit renewal, please do not hesitate to call.

Respectfully,

Chuck Jett,  
Solid Waste Superintendent

Chuck Jett, Solid Waste Superintendent

3/23/04

# SUMTER COUNTY - MEETING TO DISCUSS RESPONSES TO RFI #2

SJP  
SGM  
JRM  
BERNARD DEW  
MULHAM ZIMMS  
CHUCK JETT  
MITCH KESSLER  
DAVID SPRINGSTEAD

SGM - MATERIALS REC'D FEB 2, 2004 FOR COMPOST/MRF PERMITS

- COMPLETE BUT NOT SUFFICIENT; NEEDED SOME ADD'L INFORMATION
- MAY NEEDED TO DEVELOP SPECIFIC CONDITIONS

JRM - RESPONSES TO RFI #2 MOST RECENTLY REC'D 3/4/04

- "OFF CYCLE" FROM MRF & COMPOST PERMITS

SJP - NO FURTHER PLANS

- APPLICATIONS IN HOUSE FOR OVER 1 YEAR SO WILL NOT PREPARE RFI #3 LETTERS
- MAKE DECISIONS BASED ON INFORMATION PROVIDED IN HOUSE (OR ADD'L MATERIALS TO BE REC'D)

SGM - WASTE VOLUMES/WASTE HANDLING INCONSISTENT: BETWEEN APPLICATION FORM, ENG. REPORT & FINANCIAL

- HOW MUCH CAN BE HANDLED BY MRF, WILL ADD'L VOLUME BE BY-PASSED OR ADD ANOTHER SHIFT TO MRF - NOT ADDRESSED IN OPERATIONS PLAN

SJP - 200 TPD ON TIPPING FLOOR

D. SPRINGSTEAD - GET ~ 33% REDUCTION ON PICKING LINE

MITCH K - ACCEPTANCE TEST INDICATED MORE THAN 100 TPD

CHUCK J. - TAKING 75 TPD OFF TIPPING FLOOR NOW; PUTTING 50 TPD IN DIGESTER;

HAVING LIMITING AT FINISHING BUILDING NOW; ADD'L WASTE IS BY-PASSED

MZ - MAKING REVISIONS TO OPERATIONS MANUAL TO REFLECT THESE WASTE VOLUMES;

MAY MAKE CHANGES IN FUTURE BUT DON'T HAVE FUNDING FROM COUNTY AT

THIS TIME FOR IMPROVEMENTS

- WILL BE PLANNING ON MAX OF 100 TPD THROUGH TIPPING FLOOR

MK - COUNTY HAS AGREEMENT W/ WASTE MGMT. TO PROVIDE TRUCKS TO HANDLE BUSINESS VOLUME

SJP - FOR PERMITS PENDING NOW, NEEDED TO REFLECT CURRENT VOLUMES THAT THE

BUILDINGS/FACILITIES CAN HANDLE; COME BACK LATER FOR PERMIT MOD TO INCREASE VOLUMES LATER

- REPAIR OF DIGESTER #1 DOESN'T MATTER; CAPACITY IS LIMITED BY FINISHING BUILDING

## SUMTER COUNTY

SGM - MAX. CAPACITY OF DIGESTER #2 UNCLEAR BASED ON VOLUME

- CAN NEW DIGESTER DIGEST EFFECTIVELY WHEN FULL?

D.S. - DON'T KNOW YET FOR DIGESTER #2 AS NOT YET OPERATED w/ WASTE

SJP - EXPECT SOME VOLUME REDUCTION BUT CAN'T QUANTIFY YET (DIDN'T APPEAR TO HAVE A REDUCTION FACTOR FOR DIGESTER #1)

CJ. - DON'T LOAD DIGESTER ON WEDNESDAYS

DS - USED VOLUMES FROM MANUFACTURER

SGM - NEED TO RE-EVALUATE LOADING VOLUMES; CAN'T ASSUME IT IS LOADED FULL

MK - 800#/TON SEEMS HIGH FOR PICKED WASTE

SJP - NEED TO CHECK DENSITY USED BY MANUFACTURER IN THE CALCULATIONS

SGM - AIR SPACE IN DIGESTER #2 WON'T CHANGE; ESTIMATE IF PLAN TO RUN 66% OR 75% FULL

### AND SUBMIT REVISIONS

MK - CAPACITY OF TUBE IS (AIR SPACE) - (% FULL) - (% VOLUME REDUCTION)

SJP - IF COME UP w/ DIFFERENT BULK DENSITY, NEED TO JUSTIFY

- 800#/CUBIC YARD IS TYPICAL VALUE FOR UNCOMPACTED SOLID WASTE

- CAN USE DATA COLLECTED AS "QUALITY CONTROL" CHECKS TO SEE HOW MUCH ORGANIC

LOADING GOES INTO TUBE - BUT NEED TO MEASURE BULK DENSITY OF WASTE GOING

INTO THE TUBE AFTER PICKING LINE (NOT CORRECTLY BEING MEASURED) - NEED TO ACCOUNT

FOR VOLUME CHANGES AFTER PICKING LINE FOR NEW BULK DENSITY OF WASTE

SGM - "20% BLENDING" / MIXING ZONE BETWEEN SUCCESSIVE DAYS LOADING

DS - 10% MIXING FROM PREVIOUS DAY w/ CURRENT (10% MIXING AT BOTH 'ENDS' OF EACH DAY)

SGM - 10% WILL REMAIN IN TUBE FOR 4 DAYS

- EPA REQUIREMENT FOR SLUDGE TO BE COMPOSTED A MINIMUM OF 3 DAYS

MK - WHAT ABOUT COMPOSTING SLUDGE OUTSIDE THE TUBE (IN WINDROWS)

SJP - EPA 503 RULE, REQUIRES WINDROWS FOR 30+ DAYS, NEED TO CHECK RULE

# SUMMIT COUNTY MEETING

DS - WHAT ABOUT 3 DAYS IN DIGESTER + 21 DAYS IN FINISHING BUILDING

MK - LAB DATA FROM THORNTON INDICATES MAJORITY OF Fecal COLIFORMS ARE  
KILLED W/IN 24 HOURS

SJP - 503.32(B) - CLASS B SLUDGE REQUIREMENTS

- THORNTON DATA INDICATE LESS THAN 5,000,000 CFU (?)

MK - COMPOST RULE HAS COLIFORM STANDARD

- COUNTY WENT THROUGH 3 DIFFERENT TESTS TO PROVIDE DATA NEEDED

SJP - W/ MULTIPLE STANDARDS IN RULES, NEED TO MEET MOST STRINGENT REQUIREMENT

DS - WHAT ABOUT CLASS A SLUDGE

MK - DEFINITIONS OF DISINFECTION IN 62-701

SJP - DEFINITION REFERS TO <sup>VOLATILE</sup> SUSPENDED SOLIDS (POL GRAM)

- SLUDGE RULE REFERS TO TOTAL SOLIDS

- 503 RULE REFERS TO TREATMENT OF BIOSOLIDS NOT COMPOST

- CONFLICT IN RULE REQUIREMENTS IS NOTHING NEW, NEED TO MEET MOST STRINGENT CRITERIA

DS - APPARENT CONFLICT IN RULES REGARDING LEVEL OF DISINFECTION IS CONFUSING

MZ - HOW IS SLUDGE CLASSIFIED & CAN THEY DEMONSTRATE ONLY TAKE SLUDGE THAT MEETS  
PATHOGEN REDUCTION

SJP - DOMESTIC WASTE QUESTION REGARDING SLUDGE CLASSIFICATION

MK - COUNTY  
NEEDS TO CONSIDER TALKING W/ ELLIOT EYSTEIN (AUTHOR OF 503 RULE) FOR CLARIFICATION  
OF SLUDGE HANDLING

SJP - THAT'S FINE, <sup>TOGETHER HIS INPUT</sup> ANY COME DOWN TO RULE INTERPRETATION W/ FRANKLIN JOYAL - ANY CLARIFICATION  
HIS TO COME THROUGH FRANKLIN

- NEED TO LOOK AT METALS COMPOSITION FOR UNRESTRICTED USE OF COMPOST (SINCE USING SLUDGE)

MK - WINDOWS IN FINISHING BUILDING PROVIDE COMPOSTING FUNCTION

SJP/SGM - FINISHING BUILDING NOT PRESENTED TO US AS COMPOSTING FUNCTION, JUST CURING

- NEED TO DEMONSTRATE MEET TEMPERATURE & TURNING REQUIREMENTS FOR WINDOWS

CJ - MEET TEMP REQUIREMENTS & HAVE TO TURN WINDOWS TO KEEP TEMP DOWN IN COMPOST

## SUMMIT COUNTY MEETING

SEM - HOW DOES DIGESTER #2 MEET REQUIREMENTS TO HAVE IN VESSEL COMPOSTING FOR 3 DAYS

MK - TESTING CONDUCTED TO TRY TO DEMONSTRATE DISINFECTION

SJP - SOME QUESTIONS W/ SAMPLING RESULTS

- DOESN'T MEET '503 RULE'; SAMPLING NOTES, HOW COLLECTED, WHERE IN TUBE COLLECTED, NEED TO PROVIDE SAMPLING METHODOLOGY

SAM - SAMPLING IN TUBE #1 IS EASIER W/ SEPARATE COMPARTMENTS

SJP - LOOKING AT SOME ADD'L TESTING FOR TUBE #2 - PERFORMANCE TESTING

- IF TESTING SHOWS NOT GETTING REQUIRED TREATMENT NEED TO RELOAD INTO TUBE; NEED TO HAVE CONTINGENCY AS PART OF PERMIT CONDITIONS

MK - HAVE 2 OTHER DIGESTERS THAT COMPOST LESS THAN 3 DAYS (MS & GA)

MZ - DIFFICULT TRYING TO GET APPROPRIATE TESTING METHODS THROUGH REGULATORS

SEM - IMPROVE TESTING METHODOLOGY FOR COMPOST COMING OUT OF TUBE #2 TO MEET DISINFECTION REQUIREMENTS FOR EDPA RULES

SJP - ENOUGH DATA TO BE STATISTICALLY SIGNIFICANT TO DEMONSTRATE MEET DISINFECTION REQUIREMENTS

MK - WANT TO USE DIFFERENT FEEDSTOCKS FOR FORCE PROJECTS

SJP - CHANGE IN FEEDSTOCK WILL REQUIRE ADD'L TESTING PERIOD FOR DATA COLLECTION

JS - WHAT ABOUT FEEDSTOCK THAT DO NOT USE SLUDGE

SJP - THEN DO NOT HAVE TO MEET REQUIREMENTS OF 503 RULE

SEM - HOW DO YOU TELL TAKE A DAYS WORTH OUT OF DIGESTER #2 (VOLUME & RATE OF DISCHARGE)

CJ - CONVEYOR LIMITS AMOUNT / VOLUME COMING OUT OF TUBE; RAN CAPACITY OF CONVEYOR OPERATION

- ALSO CHECK VOLUME OF MATERIAL IN THE FINISHING BUILDING
- IF OVERLOAD THE CONVEYOR IT STOPS

SEM - REWORK SECTION ABOUT DISCHARGE RATE

SEM - OPERATION PLAN INDICATES TEMPERATURE WILL BE MONITORED; ASKED THAT THE OP. PLAN INDICATE WHAT TEMP. IS THE TARGET FOR TEMP & MOISTURE FOR DAY 1, DAY 2, DAY 3

## SUMTER COUNTY

SGM - NEED REPORT TO SUMMARIZE PROPOSED REPAIR TO DISTRICT #1

MK - HAVE HAD ENGINEERING REPORT; BOARD HAS NOT APPROVED REPAIR (\$250,000 TO \$500,000)

SJP - NEED TO SEE PHOTOGRAPHS OF CRACKS; NEED TO KNOW WHAT HAPPENED

CJ - REPAIR 60 FT OF TUBE ~~AT~~ AT BULKHEAD BETWEEN DAYS 2 & 3

SGM - NEED TO ADVISE DCS PLAN TO BE CONSISTENT W/ PROPOSED REPAIR TO TUBE #1

WHenever it happens; will be a PERMIT MOD. WHEN IT HAPPENS

SGM - ASKED FOR UPDATED TOPO FOR FACILITY; HOW WILL KNOW HOW TO REPAIR W/O  
STARTING POINT TOPO?

CJ - REPAIR PROBLEM AREAS, BRING UP TO GRADE & REPAVE

MK - HAVE HAD POTENTIAL CONTRACTORS <sup>(LANDFILL ENGINEERS)</sup> LOOKING AT PAVED AREA - PART OF C.O. PHASE II PLAN

SJP - NEED TO LOOK AT REPAIR TO ENTIRE PAVED AREA

- WILL COUNTY BE PROVIDING MATERIALS & LABOR TO DO REPAIRING

CJ - NOT DECIDED YET, BUT PROBABLY WILL DO IT THAT WAY

SJP - HOW WILL AMOUNT OF MATERIALS BE DETERMINED

DS - DISTINCTION BETWEEN ROUTING OF WORK AREAS & SETTLEMENT OF WASTE

- PLACED CRUSHED LIME ROCK ON SURFACE, COMPACT IT & REPAVE

SJP - HOW WILL CONTRACTOR KNOW HOW MUCH MATERIALS WILL BE NEEDED

- WOULD PRODUCE INITIAL TOPO, BUT PRIMARY INTEREST IS THAT NEW GRADERS ~~WILL~~ WILL DRAIN

- NEED ADD'L INFORMATION FOR CONSENT ORDER; NEED ENOUGH INFO TO APPROVE PLAN;

(FINAL CONTOURS & X-SECTIONS OF REPAIRING) - NOT A PERMIT MOD. ISSUE, A.C.O. ISSUE

- NEED TOPO FOR ENTIRE CURED LF (PAVED & UNPAVED)

JRM - GW ISSUES DISCUSSED AT LENGTH - NO NOTES TAKEN

SUMTER COUNTY

FINANCIAL COSTS -

SJP - 3 PARTIAL FOIL RECOVERED MATERIAL - MUST PROVIDE THE DEMONSTRATION TO  
EXEMPT FROM COSTS FOR FINANCIAL ASSURANCE ; IT IS CONSIDERED WASTE IF FINE  
NOT PROVIDED BYPRODUCT DEMONSTRATION.

SGM - THIRD PARTY COSTS NOT PROVIDED FOR SOME

SGM - LTC COSTS - 3<sup>RD</sup> PARTY ESTIMATES FOR GSW STAMPING / ANALYSIS

- SOME COSTS FOR MAINTENANCE OF MON. WELLS
- LANDSCAPING COSTS (MOWING) - SAME AS 5 YRS AGO
- EROSION CONTROL - NO JUSTIFICATION FOR COST AMOUNT
- ADMIN. COSTS - SAME AS 5 YRS AGO

APPLICATION FORMS - NEW APPLICANT (BECAUSE) DEW AS NEW APPLICANT)

ENG REPORT - pg 2 - 72 HOURS FOR COMPOST RESIDENCE TIME

pg 7 - 100 TPD - REVIEW & REVISE BASED ON ESTIMATED CONVEYANCE

OPS. PLAN pg 12/17 - DIGESTER OPERATION DESCRIPTION (ALL OF SECTION 4 OF OPS PLAN)

pg 19 - RETAIL TIMEFRAME REQUESTED FOR EROSION FEATURES

pg 22 - ~~WATER~~ HOT LOTS DIRECTED TO A LOCATION THAT WON'T RUN OFF ;  
NEED TO BE ABLE TO CONTAIN FIRE FIGHTING WATER

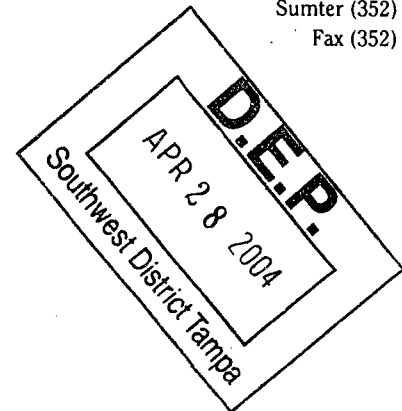
HAZ WASTE MANUAL pg 1 - NOT KNOWINGLY RECEIVE HAZ WASTE





January 14, 2004

Mr. Steven G. Morgan  
Solid Waste Section  
Southwest District  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619



**Re: Financial Responsibility Request for Additional Information  
Sumter County Composting Processing & Recycling Facility  
Suttermerville, Sumter County, Florida  
SEI File No. 921100.020**

Dear Mr. Morgan:

Please find the responses to your questions regarding the financial responsibility of the above referenced facility below:

**Sections 62-701.710(2)(j) and 62-701.630(4)(c), F.A.C. Section 8, Financial Responsibility:** Please provide following additional information:

- a. Cost Estimate For Tipped Material: Please provide following additional information in regard to this section and revise accordingly:
- 1) Please provide the calculations that support the assumptions of a maximum of 300 tons of waste on the tipping floor and a maximum of 300 tons in the digesters.
  - 1) **The maximum volume of material on the tipping floor will be 300 tons. The material in the digesters consists of 3 days waste less the recovered materials plus the weight of the sludge and water added. This maximum weight of material in the digesters is estimated to be  $[(100+121)*3] = 663$  tons.**
  - 2) Loading, hauling, and disposal costs for unfinished compost in the digester were included, but loading, hauling, and disposal costs for unfinished compost in the finishing building were not provided. Please revise the cost estimates to include costs for loading, hauling, and disposal of the maximum storage quantity of unfinished compost in the finishing building at the facility, along with supporting third party estimates.
  - 2) **Based on record drawings for the building, the maximum volume of material in the finish building is 2,520 cubic yards. This is the volume used to calculate the disposal of material.**
  - 3) Please provide a copy of the current third-party estimate that supports the stated \$57.35 per ton cost for loading, hauling, and disposal of Class I waste.

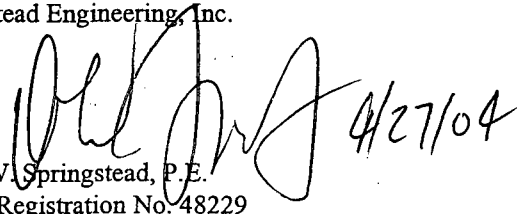
(REVISED 4/04)

- 3) **The 3<sup>rd</sup> party costs are attached. The current cost to haul and dispose class F materials has increased to \$60/ton.**
  - 4) Loading, hauling, and disposal costs for biosolids and leachate at the facility were not provided. Please revise the cost estimates to include costs for loading, hauling, and disposal of the maximum storage quantity of these wastes at the facility, along with supporting third party estimates.
  - 4) **The 3<sup>rd</sup> party costs to load, haul and dispose of leachate and biosolids was quoted by Shelley's Environmental. The written quote had not yet been received but will be forwarded to DEP.**
- b. Cost For Removal of All Recovered Materials: Please provide following additional information in regard to this section and revise accordingly:
- 1) Disposal costs for all recovered materials at the facility were not provided. Please revise the cost estimates to include costs for disposal of the maximum storage quantity of all recovered materials at the facility.
  - 1) **The 3<sup>rd</sup> party costs and revised closure cost information is attached. Loading and hauling has been figured for materials which have a value. Local hauling and disposal is figured for the remainder of the materials.**
  - 2) The lump sum load/haul/dispose costs provided from Town & Country Refuse, Inc. assumes disposal of construction & demolition debris and therefore is inconsistent with the disposal of "aluminum" or "glass containers". Please provide revised cost estimates to include costs for loading, hauling, and disposal of these items at an appropriate recycling or disposal facility.
  - 2) **The 3<sup>rd</sup> party costs and revised closure cost information for Class 1 disposal is attached.**
  - 3) Please provide a copy of the current third-party estimate that supports the stated \$11.30 per ton cost for loading and hauling of "Processed Materials", "Non-Processables", and "C&D Materials."
  - 3) **The information has been revised and the disposal cost is being determined using the \$60/ton cost for Class I waste.**
  - 4) Please provide a copy of the current third-party estimates that supports the stated "cost from vendor" to load, haul, and dispose of tires, lead-acid batteries, and used oil.
  - 4) **The 3<sup>rd</sup> party costs and revised closure cost information is attached.**
  - 5) Please provide a copy of the current third-party estimate that supports the stated \$45.00 per ton cost for loading and hauling of "White Goods" and "Yard Waste."
  - 5) **The 3<sup>rd</sup> party costs for white goods and revised closure cost information is attached.**
- c. Financial Assurance Cost Estimate Form: Please provide following additional information in regard to this form and revise accordingly:
- 1) The current groundwater monitoring plan provides for both quarterly and annual sampling of monitor wells. The form provides cost estimates for quarterly sampling only. Please explain this discrepancy and revise the estimate accordingly. Please provide a copy of the third-party laboratory quote that lists parameters, costs for QC samples, and reporting.

- 1) **The 3<sup>rd</sup> party costs and revised closure cost information has been revised and is attached.**
- 2) **The unit cost estimates provided throughout the form reflect either no change or a decrease in the approved unit cost for long-term care activities from the facility's 1997 approved long-term care cost estimates. Please provide the calculations and current third-party estimates or references utilized to support and justify the provided estimates.**
- 2) **The 3<sup>rd</sup> party costs and revised closure cost information has been revised and is attached.**

I trust this information meets your needs at this time. Should you have any questions or require additional information, please contact our office.

Very truly yours,  
Springstead Engineering, Inc.

 4/27/04  
David W. Springstead, P.E.  
Florida Registration No. 48229

DWS/jal

Attachments

cc: Tommy Hurst



**Springstead  
Engineering, Inc.**

Consulting Engineers – Architects – Planners – Surveyors

EB-0001723

AA-0002820

LB-0001723

727 South 14th Street  
Leesburg, Florida 34748

Lake (352) 787-1414

Sumter (352) 793-3639

Fax (352) 787-7221

April 19, 2004

Mr. Steve Morgan  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619



RE: Supplemental Information for Permit  
Sumter County Composting and Recycling Facility  
DEP Permit No. **126940-008-SC**  
Sumterville, Sumter County, Florida

Dear Mr. Morgan:

Based on our discussions in a meeting held Tuesday March 23, 2004, Sumter County would like to present this supplemental information for the Department to consider while reviewing the pending permit application.

The initial discussion concerned the capacity of the facility and the need to include transferring waste as a continuous process at the facility. We have revised the Operations plan to include this language. The facility can process 100 tons of tipped waste through the digesters. The current limiting process is the floor space in the finishing building. As additional finishing space is permitted, constructed and approved for operation, the limiting process at the facility will become the recyclables recovery line. An additional processing shift will double the capacity of the facility at that time. Due to current growth, the need to transfer will occur during the course of this permit. The interior ramp and current operational process will facilitate the transferring of waste. The information regarding the capacity of Digester No. 2 is attached as requested.

The next area of discussion focused on the need for material to spend 72 hours in the digester and what methodology would be used to determine how long the material has resided in the digester. After a lengthy discussion it was decided that the county would propose testing to be performed on material exiting the digester for a period of time after permit issuance to insure proper destruction of pathogens.

The revised application page indicating Mr. Bernard Dew as the facility contact person is attached as requested

Mr. Steve Morgan  
Department of Environmental Protection

April 19, 2004  
Page No. 2

The revised pages from the engineering report indicating that material will not be in the tube for 24 hours are attached.

The revised Operations Plan discussing the transfer of waste and the operation of Digester 2 along with the other changes based on our discussions are attached.

Mr. John Morris' comments concerning the additional wells and locations for gas monitoring have been addressed and the revised monitoring plan evaluation is attached.

The Department's comments about the long term care and closure costs have been addressed in the revised comments. A revised estimate will follow.

We hope that this information meets your needs at this time. Please review this information and contact me if you have any questions.

Very truly yours,  
Springstead Engineering, Inc.

  
David W. Springstead, P.E.  
Florida Registration No. 48229

Attachments

cc: Bernard Dew - Sumter County  
Chuck Jett - Sumter County Solid Waste  
Mitch Kessler - Kessler Consulting, Inc.  
Miriam Zimms - Kessler Consulting, Inc.



# Springstead Engineering, Inc.

Consulting Engineers – Architects – Planners – Surveyors

EB-0001723  
AA-0002820  
LB-0001723

727 South 14th Street  
Leesburg, Florida 34748

Lake (352) 787-1414  
Sumter (352) 793-3639

Fax (352) 787-7221

TO: Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Date: January 29, 2004

Job No.: 921100.020

Attention: Mr. Steve Morgan

RE: Solid Waste, Composting, & Recycling Facility

## GENTLEMEN:

WE ARE SENDING YOU ☒ Enclosed ☐ under separate cover via \_\_\_\_\_ the following items:

☐ Shop Drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications ☐ Facsimile

☐ Copy of Letter ☐ Change Order ☐ \_\_\_\_\_

Copies	Date	No.	Description
1			Response to Request for Additional Information (Signed & Sealed) Sumter County Composting, Processing, & Recycling Facility, Sumterville, Sumter County Pending Permit No.: 126940-010-SO - Composting Facility -- Pending Permit No.: 126941-003-SO - Material Processing Facility Pending Permit No.: 22926-003-SF - Closed Class I Long-Term Care
1			

## THESE ARE TRANSMITTED as checked below:

- ☒ For Approval ☐ Approved as submitted ☐ Approved for payment  
☐ For your use ☐ Approved as noted ☐ Resubmit \_\_\_\_ copies for approval  
☐ As Requested ☐ Returned for corrections  
☐ For Review and Comment ☐ \_\_\_\_\_  
☐ Material and/or prints returned after loan to us

## REMARKS:

## COPY TO:

SC Public Works  
Chuck Jett, SC Landfill  
Kessler Consulting

SIGNED: \_\_\_\_\_

David W. Springstead, P.E.

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

FEB - 2 2004

SOUTHWEST DISTRICT  
TAMPA



# Springstead Engineering, Inc.

Consulting Engineers – Architects – Planners – Surveyors

EB-0001723  
AA-0002820  
LB-0001723

727 South 14th Street  
Leesburg, Florida 34748

Lake (352) 787-1414  
Sumter (352) 793-3639  
Fax (352) 787-7221

TO: Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Date: January 29, 2004

Job No.: 921100.020

Attention: Mr. Steve Morgan

RE: Digester No. 2 and Infeed/Discharge

## GENTLEMEN:

WE ARE SENDING YOU ☒ Enclosed ☐ under separate cover via \_\_\_\_\_ the following items:

☐ Shop Drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications ☐ Facsimile

☐ Copy of Letter ☐ Change Order ☐ \_\_\_\_\_

Copies	Date	No.	Description
1			Certification of Construction Completion of a Solid Waste Management Facility (DEP Construction Permit No. 126940-008-SC) with photographs
1			Operations Manual
2			Sets of Record Drawings for Digester 2 infeed, discharge and foundation construction
2			Drawings AC Equipment

## THESE ARE TRANSMITTED as checked below:

☒ For Approval

☐ Approved as submitted

☐ Approved for payment

☐ For your use

☐ Approved as noted

☐ Resubmit \_\_\_ copies for approval

☐ As Requested

☐ Returned for corrections

☐ For Review and Comment

☐

☐ Material and/or prints returned after loan to us

## REMARKS:

## COPY TO:

SC Public Works

SIGNED: \_\_\_\_\_

David W. Springstead, P.E.



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

EP 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: 126940-008-SC County: Sumter  
Name of Project: Digester No. 2 and Infeed/Discharge  
Name of Owner: Sumter County Public Works  
Name of Engineer: Springstead Engineering, Inc.  
Type of Project: Construction of the digester and the infeed and discharge area to serve the digester.

Cost: Estimate: \$ 2,500,000 Actual \$ 2,515,000

Site Design: Quantity: 220 ton/day Site Acreage: 120 Acres

Deviations from Plans and Application Approved by DEP: Please see the attached photographs.

The only deviation from the plans was the addition of the wing foundations for the gear drive foundation. The mechanical equipment as built in accordance with the manufacturer's plans. A copy of A-C's as-built plans are attached along with their certification letter. Photos of the interior of the digester 2 are also attached.

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

Name(s) of Site Supervisor: Chuck Jett

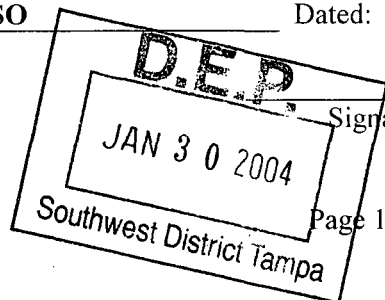
Date Site inspection is requested: As soon as possible.

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. 126941-001-SO

Dated: January 26, 2004

Date: 1/29/04



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



*Sumter County Landfill*  
*Taken: October 3, 2003*

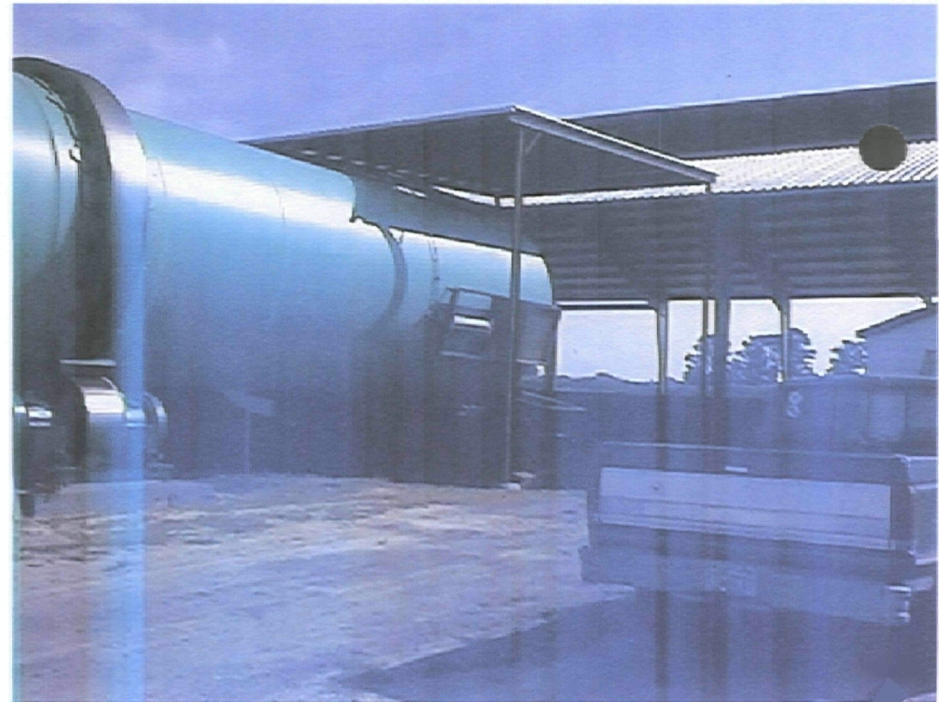


Aerial Photograph of MRF, Digester, Finish Building and Community Drop-off Area

*Sumter County Landfill  
Inspection Photographs  
Taken: October 3, 2003*



1) Looking west – Cover over Direct Feed Conveyor



2) Cover over discharge Digester #2.



*Sumter County Landfill  
Inspection Photographs  
Taken: October 3, 2003*



3) Discharge for Digester #2



4) Discharge for Digester #2

*Sumter County Landfill  
Inspection Photographs  
Taken: October 3, 2003*



5) Cover and Discharge Conveyors - Digester #2



6) Direct Feed Conveyor and Digester #2



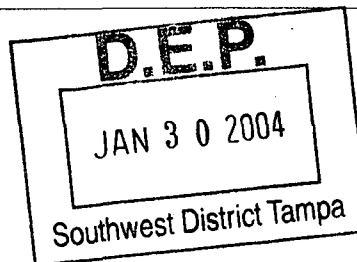
*Sumter County Landfill  
Inspection Photographs  
Taken: October 3, 2003*



7) Ram feed for Digester #2



8) Cross conveyor system for Digester Nos. 1 and 2



6623 W. Washington St.  
Milwaukee, WI 53214  
Phone (414) 475-2554  
FAX (414) 475-3328  
www.a-cequipment.com

December 18, 2003

Sumter County  
319 E. Anderson  
Bushnell, FL 33513

Attn: Mr. Garry Breeden  
Public Works Director

Subject: **CONFIRMATION OF CONSTRUCTION OF DIGESTER**

Dear Garry:

We hereby notify you that the digester constructed and installed by A-C Equipment Services during 2002 was built to the specifications agreed to in our Contract with Sumter County.

The attached letter from A-C Equipment Services dated September 30, 2002, provides Notice of Final Acceptance and indicates that all work has been completed and the Performance Test was successfully completed.

Additionally, three (3) sets of instruction manuals and "as built" drawings have been provided and distributed according to the terms of the Contract.

If you have any questions, please feel free to contact me.

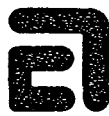
Sincerely,

A handwritten signature in black ink, appearing to read "John J. Vitas". The signature is stylized with a large, sweeping "J" and a cursive "Vitas".

John J. Vitas  
President

djw

cc: David Springstead, Springstead Engineering  
Chuck Jett, Superintendent, Sumter County Solid Waste Facility  
Miriam Zimms, Kessler Consulting Inc.



a-c  
equipment  
services

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

SEP 27 2002  
SOUTHWEST DISTRICT  
TAMPA

September 30, 2002

6623 W. Washington St.  
Milwaukee, WI 53214  
Phone (414) 475-2554  
FAX (414) 475-3328  
www.a-equipment.com

Mr. Garry Breeden  
Director  
Sumter County Public Works  
319 E. Anderson Avenue  
Bushnell, FL 33513

Subject: **NOTICE OF FINAL ACCEPTANCE**

Dear Garry,

We hereby notify you that we believe the digester is ready for final acceptance by Sumter County.

Per the contract, we certify that:

- (i) the performance of the Work is complete including all punch list items.
- (ii) the digester can be utilized and is ready for operation as far as our Work is concerned.
- (iii) the Acceptance Test has been successfully completed and all final adjustments have been performed.

The final invoice has been sent under separate cover.

If you have any questions, please feel free to contact me.

Sincerely,

John J. Vitas  
President

cc: Mitch Kessler - Kessler Consulting

CERTIFICATION

STATE OF Wisconsin )  
COUNTY OF Milwaukee ) SS:

Pursuant to Section 6.02 of that certain Procurement Agreement dated September 18, 2001, by and between Sumter County, Florida, and A-C Equipment Services, Corp. ("A-C"), the undersigned John J. Vitas, President of A-C, hereby certifies, for and on behalf of A-C, that all payrolls, invoices of subcontractors, materials, equipment, and other indebtedness connected with the work completed to the date of this affidavit have been paid or otherwise satisfied is provided for by a bond satisfactory to Sumter County.

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

JAN 30 2004

SOUTHWEST DISTRICT  
TAMPA

A-C EQUIPMENT SERVICES, CORP.

By: 

John J. Vitas, President

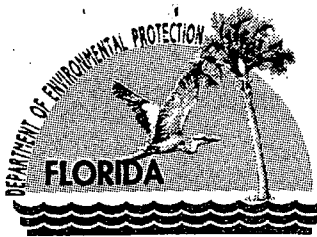
Subscribed and sworn to before me this 1<sup>st</sup> day of October, 2002.

Donna Wellner  
Notary Public

My Commission Expires:

July 30, 2006





# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

Sumter County Public Works Department  
Mr. Garry Breeden, Director  
319 E. Anderson Ave.  
Bushnell, Florida 33513

November 7, 2003

**Re: Sumter County Composting, Processing, & Recycling Facility,  
Sumterville, Sumter County  
Pending Permit No.: 126940-010-SO - Composting Facility  
Pending Permit No.: 126941-003-SO - Material Processing Facility  
Pending Permit No.: 22926-003-SF - Closed Class I Long-Term Care**

Dear Mr. Breeden:

This is to acknowledge receipt of additional information prepared by Springstead Engineering, dated October 7, 2003, (received October 9, 2003), for the above referenced permit renewal applications to operate a solid waste composting facility and a waste processing facility, and continue long-term care, monitoring, and maintenance for a closed Class I Landfill.

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 2nd 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.

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(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 13. - Estimated Closure Costs: Please provide the facility's revised closure cost estimate amount, calculated as required by Rule 62-701.630(4)(c), F.A.C., in this section of the application form. (See comment #16 below)

b. Section A. "General Information" Part 15.: Please verify the expected volume of waste to be received by submittal of the waste projection information required in accordance with Rule 62-701.710(2)(a), F.A.C. (see comment #2d below), and revise this section of the application form as appropriate.

c. Rules 62-701.710(2)(g) and 62-709.500(2)(c), F.A.C. Application Form #62-701.900(4) Section B. "Additional Information" Part 8.: There have been several changes in site conditions (e.g. citizen drop-off area, revised storm water management system etc.) that have occurred since January 2001. Therefore a January 2001 topographic survey is not "representative of current site conditions." Please provide a current topographic survey of the site.

*"More Protection, Less Process"*

2. **Rules 62-701.320(7)(d) and 62-709.300(3), F.A.C. Engineering Report:** Please provide following additional information and revisions to the engineering report. Please provide a comprehensive engineering report that incorporates the responses to these comments.

a. Engineering Report, Overview: This section states, "As this material falls into the hopper, the ram cycles and loads the first compartment of the digester. Based on the volume of the material entering the facility, the material will spend 24 to 72 hours in the digester. The temperature, moisture content, and level of material in each digester compartment will be measured at least daily." This statement is inconsistent with the procedures provided in Section 4.3 of the Operations Manual. Please explain how this procedure applies to Digester #2 since it does not have "compartments." Please provide the basis for requiring only 24-hour residence time in the digester. Please revise this section accordingly.

b. Engineering Report, Contingency Plan: The most recent inspection of the Materials Recycling Facility ("MRF") by Department personnel noted continued use of the loading ramp located outside the north side of the MRF building. Your response letter states, "The loading ramp currently exists and is being used." Please note that this activity is not a part of your permitted contingency plan for the facility and the use of the loading ramp is not authorized under your current facility permit, and continued unauthorized use of the loading ramp will subject you to potential enforcement action by the Department. Please revise Section 6.0 of the Operational Manual to include a description of the facility contingency plans for bypass of waste at the facility and a detailed description of the proposed vehicle loading procedures, including proposed equipment and the building dimensions within the residential drop-off side of the MRF building tipping area.

c. Engineering Report, Unauthorized Wastes: This section states, "Bins are provided for storage of unacceptable items..." and "If the source of the hazardous waste cannot be identified, it will be separated and placed in bins located inside the building." Please revise Attachment A - Hazardous Waste Manual to identify the location and types of these "bins".

d. Engineering Report, Unauthorized Wastes: This section provides a description of how "hazardous waste" is identified and handled at "four check points". Please revise this section and Section 3.2 of the Operations Manual to clarify how other non-hazardous unacceptable wastes are identified and handled at these "check points".

e. Engineering Report, Closure Plan For The Facility: Please revise this section to provide procedures for removal and disposal of unfinished compost located in the digesters and the finishing building, remaining biosolids, and leachate in the mixing basin as part of facility closure. The closure plan shall include procedures for removal of all materials located in the digester and finished building, including "classified" materials. Please identify the "reoccurred materials" referenced in this section.

f. Engineering Report, Additional Pertinent Information: Please revise this section to reference procedures for evaluating and minimizing off-site odors associated with facility operations in Section 1.2 of the Operation Manual.

(Comment #2, cont'd)

g. Engineering Report, Additional Pertinent Information: Please revise this section to identify the facility operator(s), verify that they have completed the required training for certification as waste processing facility operator in accordance with Section 62-701.320(15)(b)2., F.A.C., and provide copies of certificates as appropriate. Please revise this section to identify the number of trained spotters that will be located at the Citizen Drop-off Area and the Materials Processing Building tipping area, identify facility personnel that have completed training for certification as trained spotters in accordance with 62-701.320(15)(c), F.A.C., and provide copies of certificates of completion as appropriate.

h. Engineering Report, Waste Projections (Page 7): There continue to be inconsistencies in quantities of waste the facility projects to be received at the facility and the capacity of the facility. Section A. Part 15. of Application Form #62-701.900(4) estimates that the facility will receive 200 tons/day. This section indicates that the facility currently accepts about 100 tons/day and projects a 24% increase by 2009. Your response letter indicates that the MRF has a processing capacity of 100 tons per 8-hour shift and your proposed hours of operation are 8:00 AM - 4:00 PM. Your capacity calculations indicate that the capacity of the two digesters is a combined 135 tons. Unless it is planned that by-pass of waste for alternate disposal is a part of routine facility operation, rather than a contingency plan, or operation hours of the MRF are amended, it appears that the facility's capacity is limited to the current 100 tons/day operating capacity of the MRF, and acceptance of waste at the facility should be limited accordingly. Please address these issues and revise this and all other appropriate sections of this application accordingly.

3. Section 4, Table 1 - Material Quantities For Recycling, Processing, and Composting Facility: There are multiple inconsistencies between this table and the facility site plans. For example, this table indicates multiple "hoppers" for aluminum cans stored at the CDA, however Sheet 1 of 1 "Loading Area Site Plan" shows no area designated for aluminum can hoppers. Sheet 1 of 1 "Loading Area Site Plan" shows a "Loose Tin Can" storage area, but "Loose Tin Cans" are not listed on Table 1. Please verify that all material types, maximum storage quantities, storage methods, required area dimensions, and storage locations identified in Table 1 are consistent with locations and dimensions identified on the site plans for the facility and revise this table and/or the facility site plans accordingly.

4. Section 4, Supplemental Information For Long-term Care: Please provide following additional information in regard to this section:

a. Your response letter indicates that the facility has been recently re-permitted for storm water by SWFWMD. Please provide a copy of the referenced SWFWMD permit issued to the facility along with the associated as-built drawings.

5. Section 4, Report of Effectiveness of Landfill Design: Please provide following additional information in regard to this section:

a. The geotechnical testing referenced in this section and provided as an attachment to this submittal is the subsurface exploration investigation conducted in support of construction of the Compost Finishing Building, and therefore does not address the effectiveness of the landfill design or the "effects on the site... due to landfill operations at the subject site." Please provide or reference the documentation and/or investigations conducted that were utilized to support the conclusion presented in this section and revise this section accordingly.

(Comment #5, cont'd)

b. The geotechnical testing referenced in this section and provided as an attachment to this submittal is the subsurface exploration investigation conducted in support of construction of the Compost Finishing Building, and therefore does not address settlement or sloughing of the closed landfill or foundation support of the landfill. Please provide or reference the documentation and/or investigations conducted that were utilized to substantiate the conclusion that "No settlement or sloughing has occurred due to foundation support" and revise this section accordingly.

c. The facility procedures for repair of the asphalt final cover for Phase III noted in your response letter reiterates the current facility procedures for asphalt cover repair, which have been ineffective in addressing the issue of subsidence, cover integrity and drainage. The letter was unresponsive to subsidence and drainage issues at the outdoor compost pads. The most recent inspection of the facility by the Department noted continuing chronic subsidence of the asphalt cover over Phase III and the outdoor finished compost storage pad, affecting drainage in the area. Please provide the supporting information that was used to substantiate the conclusions provided in this section or provide a plan for correction of the settlement on the closed landfill and revise this section accordingly.

d. During recent inspections, the Department has observed areas of significant settlement on the closed landfill. Please explain how the landfill cover "is effective and has operated as designed" in spite of significant settlement in grassed cover and cracking and settlement in the asphalt cover, and revise this section accordingly.

e. Please provide a current topographic survey that shows the current condition of all of the closed landfill areas.

6. Section 4, General Maintenance for the Covered Areas of the Closed Class I Landfill - Areas Covered with Liner, Soils, and Grass: This section references documentation maintained at the site that identifies areas of repair. Based on recent inspections, the facility operator is unaware of the existence of such documentation. Please explain this discrepancy. Please revise this section to describe the procedures used to verify that repairs are completed to match the designed slope of the cover.

7. Section 4, General Maintenance for the Covered Areas of the Closed Class I Landfill - Area Covered with Asphalt: Contrary to the statement made in your response letter, limerock and/or recycled asphalt materials are frequently used to repair cracks and subsidence in the asphalt cover, without subsequent repaving. Therefore, the current facility procedures for asphalt cover repair, have been ineffective in addressing the issue of subsidence, cover integrity and drainage. Please provide a proposed corrective action plan that addresses the repairs to the asphalt final cover of Phase III that the facility plans on implementing once the recycled materials storage and processing operation is moved. Please revise this section to include revised procedures for monitoring and maintenance of the asphalt cover and procedures for repair of future subsidence, cracking, and ponding that may occur. This section references documentation maintained at the site that identifies areas of repair. Based on recent inspections, the facility operator is unaware of the existence of such documentation. Please explain this discrepancy. Please revise this section to describe the procedures used to verify that repairs are completed to match the designed slope of the cover.

8. Rules 62-701.320(7)(e) and 62-701.710(2)(h), F.A.C. Sumter County Solid Waste Facility Operations Manual, February 2003: Please provide the following additional information and revisions to the facility operation plan. Please provide a comprehensive Operations Manual that incorporates the responses to these comments.

a. Operations Manual: Please revise this section to reference the recyclables storage building and the outdoor finished compost storage pads as components of the facility, as previously requested.

b. Operations Manual, Section 1.2: With the exception of the reference to "odor masking aerosol spraying devices," the description of facility odor control procedures in this section reiterates the current facility procedures, which have been ineffective in minimizing reoccurring and confirmed complaints of off-site odor associated with facility operations. Please revise Section 1.2 of the Operation Manual to provide revised procedures for evaluating and minimizing off-site odors associated with facility operations. Please provide manufacturer's information on the "odor masking aerosol spraying device" and the aerosol masking agents proposed to be used. Please revise Section 1.2 of the Operation Manual to include the specific proposed operational procedures for implementation and use of the "odor masking aerosol spraying devices" as part the facility odor control procedures.

c. Operations Manual, Section 1.7: Please provide a description of the facility procedures for maintenance of the MRF building and the leachate collections system, including proposed frequency of maintenance and revise the Operational Manual accordingly.

d. Operations Manual, Section 3.1.1: Please clarify how often the Class I roll-off will be emptied in the MRF Building and that the Class I roll-off will be covered or tarped at the end of the day or during inclement weather and revise this section accordingly.

e. Operations Manual, Section 3.1.3: Please revise Attachment B to include biosolids as a special waste accepted at the facility, as previously requested.

f. Operations Manual, Section 4.1: Please revise this section to clarify how materials will be "processed" or "prepared" at the CDA.

g. Operations Manual, Section 4.2: Please revise this section to identify where in the process the aluminum cans are re-introduced.

h. Operations Manual, Section 4.2: This section provides that "Sorters at the bulky waste sorting station remove bulky waste..." and "The bulky waste is dropped into a truck..." Please confirm that a truck is located at the bulky waste sorting station or revise this section accordingly to accurately describe operation at the bulky waste sorting station.

i. Operations Manual, Section 4.3: Please provide plans that demonstrate that the direct feed conveyor is suitable for feeding biosolids into the digester system and that all leachate is contained.

(Comment #8, cont'd)

j. Operations Manual, Sections 4.3.1 & 4.3.2: These sections state, "The material will stay in the digester for a period of 24 to 72 hours. No materials shall be removed... unless a residence time of 24 hours... has been maintained." Specific Condition #7.k. of the current compost facility permit provides that, "Materials shall remain a minimum of 72 hours in the digester unit, unless the permittee demonstrates that a reduced time period does not adversely affect the effectiveness of the composting process." If it is the permittee's intention to reduce the residence time for materials in both digesters, please provide supporting information, calculations, and data for each digester that demonstrates that a reduced time period does not adversely affect the effectiveness of the composting process. Please revise these sections to describe residence time in each digester, as appropriate.

k. Operations Manual, Section 4.3.1 & 4.3.2: Please provide supporting information, documentation, and calculations from similar digester operations that demonstrate that materials initially loaded in to the digester will not commingle with the previous day's loaded materials in the now combined first two-thirds of Digester #1 and throughout the entire length of Digester #2. Based on the findings of these demonstrations, please revise the narrative of these sections, as appropriate.

l. Operations Manual, Section 4.3.1 & 4.3.2: Assuming that it is demonstrated that that materials initially loaded into each digester will not commingle with the previous day's loaded materials in the now combined first two-thirds of Digester #1 and throughout the entire length of Digester #2, please revise these sections to provide a description of the facility's procedures for measuring the temperature and moisture of each day's batch of composting materials, along with a description of the temperature measuring procedures in the third compartment of Digester #1. Otherwise, please revise these sections to provide a description of alternate temperature measuring procedures.

m. Operations Manual, Section 4.3: Recent inspections have noted improper drainage of the biosolids storage area. Please revise this section to include a description of the operation of the biosolids storage area, including drainage. Please specify the type of biosolids used in the process. Your response letter states, "Please see revised Section 4.3 in the operations manual for this information." Section 4.3 has not been revised to include this description.

n. Operations Manual, Section 4.4: Recent site inspections and discussions with facility and county personnel have revealed that storage and screening of finished compost is occurring in a large area east of the Compost Finishing Building. The existence of this area is not addressed in this section nor is the storage and screening of materials in this area consistent with the composting finishing operations described in this section. Please explain what specific operations are occurring in this area, including the condition and classification of the compost materials that are being stored and processed in this area.

o. Operations Manual, Section 4.4: Please clarify where compost is stored until the analytical results are received and revise this section accordingly.

(Comment #8, cont'd)

p. Operations Manual, Section 4.5: This section indicates that compost is stored on the north compost pad "to stabilize as it ages" and "Any materials sold and removed from the facility for use will come from this pad." However, recent site inspections and discussions with facility and county personnel have revealed that materials stored and screened in the area east of the Compost Finishing Building are also sold or used as finished compost. In addition, facility personnel indicate that further screening of materials is also occurring on the north compost pad. Please address these inconsistencies and revise this section accordingly.

q. Operations Manual, Section 4.5: Your response letter states, "Wood chips may be placed on the closed center pad for composting. Only wood chips generated at the county facility will be placed on this pad. No other compost materials at the site will be mixed with the wood chips." However, discussions with facility personnel during the most recent site inspection revealed that biosolids are being added to the wood chips on this pad to promote composting. Please address this discrepancy and discuss the potential impacts of runoff from this compost pad into the adjacent "stormwater pond." As appropriate, please revise this section to accurately describe composting operations on the "central compost pad."

r. Operations Manual, Section 4.6: Please revise this section to provide waste handling procedures in the event of equipment failure (such as the loader), fire, or insufficient personnel.

s. Operations Manual, Section 5.1: Please see Comments 6 and 7 above regarding documentation and final cover repair and revise this section accordingly. Please revise this section to clarify the specifics of the "annual survey" referenced in this section. Please specify the time frames for implementation of the corrective actions discussed in this section.

t. Operations Manual, Section 5.3: Please provide a figure that shows all monitoring locations for groundwater, surface water (if applicable) and landfill gas.

u. Operations Manual, Section 6.1: Please clarify where "large quantities of dirt which will be used for fire control" will be stored. Please clarify if the "isolated area away from the active tipping area" is within the MRF building.

9. Appendix A - Hazardous Waste Manual: Please revise Appendix A to include the clarification information provided in your response letter.

10. Section 5., Appendix B - Management of Special Wastes and Miscellaneous Materials: Please identify the specific location at the facility where each of the special wastes and miscellaneous materials are being managed and stored. Your response letter indicated that Appendix B was revised to provide this information, however, no revisions to Appendix B were made.

11. Section 5, Appendix B - Management of Special Wastes and Miscellaneous Materials: Please revise Appendix B to identify the location at the facility where yard waste mulching operations will be conducted. Please revise the Operations Manual to provide a description of how the mulching operation will be conducted in accordance with Rule 62-709.320, F.A.C.

12. Section 5, Appendix B - Management of Special Wastes and Miscellaneous Materials: Please revise Appendix B or the Operations Manual to provide a detailed description of the facility's procedures for recycling automotive parts and recovering recyclable materials from electronics.

13. Section 5, Appendix B - Management of Special Wastes and Miscellaneous Materials: Please revise Appendix B to include the description of the specific precautions and procedures used when removing the valves and releasing the remaining gas from propane tanks provided in your response letter.
14. Section 5, Appendix D - MRF/Processing Building Schematic: This schematic identifies an "Isolated Homeowner Drop-Off Area." Please provide a revised schematic that accurately identifies the proposed future use for this area.
15. Rules 62-701.710(2)(j) and 62-701.630(4)(c), F.A.C. Section 8, Financial Responsibility: Your response letter indicates that responses to most of the Department's March 24, 2003 comments regarding financial assurance would be provided under a separate cover letter. Therefore, the financial assurance will be evaluated as a whole once that information is provided.
16. Rules 62-701.320(9)(a), F.A.C. Certification of Construction Completion DEP Form #62-701.900(2) - Citizen Drop-off Area Construction & Sheet 1 of 1 "Loading Area Site Plan": Please provide the following additional information and revisions to the Certification of Construction Completion and associated plan sheet. Please provide a revised signed and sealed Certification of Construction Completion DEP Form #62-701.900(2) and revised signed and sealed drawings that incorporate the responses to these comments.
  - a. Sheet 1 of 1 "Loading Area Site Plan": This "as-built" plan sheet shows the "Wood Recycle Pole Barn" as a separate structure. Recent Department inspection of the facility revealed that it was constructed as an attachment to the "Modular Building." Please explain this discrepancy and revise the plan sheet accordingly.
  - b. Sheet 1 of 1 "Loading Area Site Plan": This "as built" plan sheet shows that the "Ramp" proposed at the west end of the Citizen Drop Off Area ("CDA") has been eliminated and the "Ramp" proposed next to the "Densifier" has not been constructed. Please explain how the Class III and C&D waste stored at the CDA will be loaded into vehicles for disposal and how the densifier will be loaded without the proposed ramps. If ramps are to be built, please identify the location of these ramps and indicated the proposed timeframe for completion of construction.
  - c. Sheet 1 of 1 "Loading Area Site Plan": This "as-built" plan sheet shows that the CDA was constructed at the "exact" elevations that were permitted. Please provide a copy of the survey utilized to confirm this or alternatively survey the CDA and provide a revised plan sheet with actual constructed elevations.
  - d. Sheet 1 of 1 "Loading Area Site Plan": This "as-built" plan sheet shows that the electronics and battery storage areas are "covered." However no "cover" has been constructed over these areas. Please explain this discrepancy, and revise this plan sheet accordingly.
  - e. Sheet 1 of 1 "Loading Area Site Plan": Information provided by the County on April 26, 2002 as part of the approved permit modification application indicated that the used oil tank "will be set up as it is currently setup at the new location shown on the plan." The used oil tank is currently located within a curbed containment area. A curbed containment area has not been constructed at the proposed "used oil" area at the CDA. Please explain this discrepancy, provide the proposed timeframe for completion of construction of this containment area and revise the "as-built" plan sheet accordingly.



(Comment #16, cont'd)

f. Sheet 1 of 1 "Loading Area Site Plan": Information provided by the County on April 26, 2002 as part of the approved permit modification application indicated that "The densifier... will be relocated under roof in the area shown." A roof has not been constructed at the proposed "densifier" area at the CDA. Please explain this discrepancy, provide the proposed timeframe for completion of construction of this roofed area and revise the "as-built" plan sheet accordingly.

17. Rules 62-701.320(9)(a), F.A.C. Certification of Construction Completion DEP Form #62-701.900(2) - Digester #2 and In-feed/Discharge and associated record drawings: Please provide the following additional information and revisions to the Certification of Construction Completion and associated record drawings. Please provide a revised signed and sealed Certification of Construction Completion DEP Form #62-701.900(2) and revised signed and sealed record drawings that incorporate the responses to these comments.

a. Sumter County Solid Waste Management Facility Sheet 1 of 1 "Force Infeed/Discharge": This "record drawing" plan sheet shows no notations of any deviations in construction from the permitted design drawings. Please verify that, in fact, no deviations occurred in construction. Alternately, please provide a revised "record drawing" plan that identifies all deviations that occurred during construction.

b. Sumter County Solid Waste Management Facility Sheet 1 of 1 "Ram Wall", Springstead Engineering, February 11, 2002: Please provide "record drawing" of the construction completed in accordance with the proposed construction depicted on this permitted design plan sheet, including notations of deviations in construction from the design plans.

c. Compost Finishing Building Secondary Digester Bay Addition Sheet 1 of 1 "Force Infeed/Discharge": This "record drawing" plan sheet shows no notations of any deviations in construction from the permitted design drawings. Please verify that, in fact, no deviations occurred in construction. Alternately, please provide a revised "record drawing" plan that identifies deviations that occurred during construction.

d. Compost Finishing Building Secondary Digester Bay Addition Sheet 2 of 2 "Details": This "record drawing" plan sheet shows no notations of any deviations in construction from the permitted design drawings. Please verify that, in fact, no deviations occurred in construction. Alternately, please provide a revised "record drawing" plan that identifies deviations that occurred during construction.

e. F.O.R.C.E. Solid Waste Digester II Sheet 1 of 2 "Site Plan": This "record drawing" plan sheet shows no notations of any deviations in construction from the permitted design drawings. Please verify that, in fact, no deviations occurred in construction. Alternately, please provide a revised "record drawing" plan that identifies deviations that occurred during construction.

f. F.O.R.C.E. Solid Waste Digester II Sheet 2 of 2 "Foundation Plan": This "record drawing" plan sheet shows no notations of any deviations in construction from the permitted design drawings. Please verify that, in fact, no deviations occurred in construction. Alternately, please provide a revised "record drawing" plan that identifies deviations that occurred during construction.

g. Plan Sheets #69-4133, 69-4134, 69-4135, 69-4136, 69-4138, 69-4152A, 69-4154A, 69-4154B, 69-4155, 69-4157, and 69-4144A, dated October 2, 2001, prepared by A-C Equipment Services: Please provide "record drawings" of the construction completed in accordance with the proposed construction depicted on these permitted design plan sheets, including notations of deviations in construction from the design plans.

**The following comments are for information only at this time and do not require an immediate response:**

1. Please be advised that pursuant to Rule 62-4.070(5), F.A.C., the Department shall take into consideration a permit applicant's violation of any Department rules at any installation when determining whether the applicant has provided reasonable assurances that Department standards will be met. As indicated in Comment #2.b., 5.c., 5.d., 6, 7, 8.b., 8.k., 8.m., 8.n., 8.p., 8.q., and 8.s. above, it appears that the facility has not been operated in accordance with its permitted design.

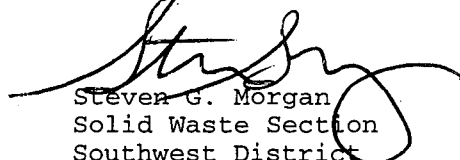
2. The Record Drawings provided do not appear to accurately reflect the as-built condition or that construction is complete. Please be advised that the Department cannot approve the construction completion or operation of these areas or systems until sufficient as-built information is provided. The as-built information must demonstrate that the area or system was constructed in accordance with the permitted plans and is ready for operation. The operation of Digester #2 and its appurtenances and the CDA are not approved at this time.

**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 3 copies of your response to this letter as one complete package with an original and two 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

Attachment

cc: David Springstead, P.E., Springstead Engineering 727 South 14<sup>th</sup> Street, Leesburg, Fl. 34748

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

Francine Joyal, FDEP Tallahassee

A Susan Pelz, P.E., FDEP Tampa

John Morris, P.G., FDEP Tampa



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

November 7, 2003

Mr. Garry Breeden  
Sumter County Department of Public Works  
319 E. Anderson Ave.  
Bushnell, FL 33513

Re: Sumter County Closed Class I Landfill  
Long-term Care Permit Renewal, Pending Permit No. 22926-003-SF

Dear Mr. Breeden:

This letter has been prepared to acknowledge the receipt of the submittal entitled *Response to Request for Additional Information (1)*, prepared by Springstead Engineering, Inc. (SEI), received October 9, 2003 in response to the Department's request for additional information (RAI) letter dated March 25, 2003 regarding the renewal application for the long term care permit at the referenced facility. In addition, the proof of publication of the Notice of Application was received under separate cover via facsimile from SEI on October 15, 2003. The sections of the SEI submittal that address the long term care permit include the following:

- Transmittal letter from SEI dated October 7, 2003 (14 pages, addressed to Steven G. Morgan)
- Transmittal letter from SEI dated October 7, 2003 (9 pages, addressed to John R. Morris)
- Section 1 -- DEP Form No. 62-701.900(1), Solid Waste Management Facility, revised
- Section 4 -- *Engineering Report*, revised
  - Subsection entitled "Requirements of Section M"
  - Subsection entitled "Requirements of Section P"
  - Subsection entitled "Requirements of Section R"
  - Subsection entitled "Supplemental Information for Long Term Care"
  - Subsection entitled "Report of Effectiveness of Landfill Design"
  - Subsection entitled "General Maintenance for the Covered Areas of the Closed Class I Landfill"
  - Proof of Publication of Declaration to the Public dated February 12, 1998
- Section 5 -- *Sumter County Solid Waste Facility, Operations Manual*, revised
  - Subsection entitled "Section 5.0 -- Long Term Care"
  - Appendix F -- Monitoring Well Location Map, prepared by SEI, dated October 2003
  - Appendix F -- Overall Site Plan, Sheet 1 of 1, prepared by SEI, dated October 8, 2003
- Section 6 -- Transmittal letter from Central Testing Laboratory (CTL) dated July 24, 2003
  - Responses to selected review comments from the Department's letter dated March 25, 2003, including comment Nos., 16, 17, 19, 20, 21, 23.c.1) through 23.c.4), 23.d.1) and 23.d.2), 23.e.1), 23.e.3), and 25.d.
  - Table A -- Monitor Well Construction Details, Sumter County Closed Class I Landfill, revised May 27, 2003
  - Submittal entitled *Sumter County Ground Water Monitoring Plan Evaluation* (GWMPE), prepared by CTL, revised May 28, 2003 (page 11 of 12 of the GWMPE, received via facsimile November 6, 2003)
- Section 7 -- Copies of closure documents and record drawings provided for Phases I, II and III

This letter also constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes. Your application for a permit renewal remains incomplete. This letter represents the second request for additional information in support of your permit application. Evaluation of your proposed project will be delayed until all requested information have been received. The following information is needed in support of the solid waste application [Chapter 62-701, Florida Administrative Code (F.A.C.)].

"More Protection, Less Process"

Please provide responses to all review comments that do not include the phrase: **"No additional information is requested."** Please provide revised submittals, or replacement pages to the submittals, that use a ~~striketrough~~ and underline format, or similar format, to facilitate review. Please also include the revision date as part of the header/footer for all revised or replacement pages. The information requests have been referenced to the permit application form and sections of the supporting information, and the review comment numbers are consistent with the Department's RAI letter dated March 25, 2003, except for new comment No. 4A, as presented below:

**DEP FORM NO. 62-701.900(1), SOLID WASTE MANAGEMENT FACILITY PERMIT FORM**

**Part A – General Information**

1. **A.1.:** The revision to this item of the application form to indicate the type of facility as a Class I landfill is noted. **No additional information is requested.**
2. **A.2.:** The revision to this item of the application form to indicate the type of application is a closure permit is noted. **No additional information is requested.**
3. **A.4.:** The revision to this item of the application form to indicate the facility name is the Sumter County closed Class I landfill is noted. **No additional information is requested.**
4. **A.5.:** The revision to this item of the application form to indicate the DEP ID Number is SWD/60/53008 is noted. **No additional information is requested.**
- 4.A. **A.7.:** The latitude and longitude coordinates provided on the revised application form are different from the application form submitted in February 2003, and it is noted that neither set of coordinates represent the center of the landfill footprint. Please verify that a latitude of 28°44' 36" and a longitude of 82°5' 19" accurately reflects the center of the closed class I landfill areas at the facility and submit revisions to this item of the application form.
5. **A.17.:** The revision to this item of the application form to indicate that the closed Class I landfill areas of the facility receive no waste (0 tons/day) is noted. **No additional information is requested.**

**Part B – Disposal Facility General Information**

6. **B.10.:** The revision to this item of the application form to indicate that an attendant will not be present at the closed Class I landfill is noted. **No additional information is requested.**
7. **B.11.:** The revision to this item of the application form to indicate that spotters will not be present at the closed Class I landfill is noted. **No additional information is requested.**
8. **B.14.:** The revision to this item of the application form to indicate a "N/A" response regarding days of operation of the closed Class I landfill is noted. **No additional information is requested.**
9. **B.15.:** The revision to this item of the application form to indicate a "N/A" response regarding the hours of operation of the closed Class I landfill is noted. **No additional information is requested.**
10. **B.21.:** The revision to this item of the application form to indicate a "None" response regarding the landfill bottom liner for the closed Class I landfill is noted. **No additional information is requested.**

**Part C – Non-disposal Facility General Information**

11. **C.1. through C.25.:** The revision to these items of the application form to indicate a "N/A" response is noted. **No additional information is requested.**

**Part D – Prohibitions (Rule 62-701.300, F.A.C.)**

12. **D.1. through D.11.:** The revision to these items of the application form to indicate a "N/A" response is noted. **No additional information is requested.**

Part L – Landfill Operation Requirements (Rule 62-701.500, F.A.C.)

13. **L.1. through L.13.:** The revision to these items of the application form to indicate a "N/A" response is noted. **No additional information is requested.**

Part M – Water Quality and Leachate Monitoring Requirements (Rule 62-701.510, F.A.C.)

14. **M.1.b.:** The revision to this item of the application form to reference Section 4 of the renewal application (*Engineering Report*) is noted. The revisions to the subsection entitled "Requirements of Section M" on page 6 of the *Engineering Report* that indicates all sample collection and analyses shall be performed in accordance with the Department's Standard Operating Procedures that are referenced in Chapter 62-160, F.A.C., are noted. **No additional information is requested.**

15. **M.1.c.(1):** While this item to the application form was revised to reference Section 2.0 of the GWMPE as requested, it does not appear that the GWMPE was revised to address the review comment regarding the lateral distance from the detection wells to the edge of the disposal units for Phases I, II and III. The response to this review comment in the SEI letter does not specify the location of the response. The only response to this comment appears to be in Section 5.2 of the *Operations Manual* that references a new figure ("Monitoring Well Map") presented in Appendix F. It is noted that this figure does not identify the location of the edge of the disposal units for the closed landfill phases, so this figure is not adequate to determine the lateral distances between the landfill and the monitor wells as requested. Please provide a complete response to this review comment as presented in the March 25, 2003 RAI letter, (presented below in italics):

*Please submit a revised application form that references Section 2.0 of the Ground Water Monitoring Plan Evaluation (GWMPE), prepared by CTL. Please submit revisions to the GWMPE to demonstrate that the locations designated as detection wells in Specific Condition No. 20 of permit No. 22926-002-SF (MW-1, MW-2, MW-4, MW-7, MW-8 and MW-9) are within 50 feet of the edge of the disposal unit in the downgradient direction. Please submit a scale-drawn figure that shows the waste footprint in Phases I, II and III and the distances from the edge of waste to each monitor well. (Rule 62-701.510(3), F.A.C.)*

16. **M.1.c.(3):** The revision to this item of the application form to reference Section 2.0 of the GWMPE is noted. The revision to Section 2.0 of the GWMPE to address the adequacy of using well MW-6A as the background well is noted. **No additional information is requested.**

17. **M.1.c.(4):** The revision to this item of the application form to reference Section 2.0 of the GWMPE is noted. The revision to Section 2.0 of the GWMPE (Table 1) to provide the latitude and longitude coordinates for each of the existing monitor wells is noted. **No additional information is requested.**

18. **M.1.c.(5):** While this item of the application form was revised to reference Section 2.0 of the GWMPE as requested, it does not appear that the GWMPE was revised to address the review comment regarding the lateral spacing between monitor wells on the downgradient side of the facility. Rather, the response to this review comment in the SEI letter indicates that the lateral distances between monitor wells are presented on the figures ("Monitoring Well Map" and "Overall Site Plan") provided in Appendix F of the *Operations Manual*. Please submit a revised application form that references Appendix F of the *Operations Manual*.

19. **M.1.c.(6):** While this item of the application form was revised to reference Section 2.0 of the GWMPE as requested, it does not appear that the GWMPE was revised to address the review comment regarding the adequacy of the well screen locations. The requested revisions to Table A ("Monitor Well Construction Details") were provided in the CTL transmittal letter, however this summary table was not incorporated into or referenced by the GWMPE. Please revise the appropriate section of the GWMPE to provide an evaluation of the adequacy of the well screens of the existing wells to monitor the saturated thickness of the uppermost aquifer within the zone of discharge (Rule 62-701.510(3)(d)4, F.A.C.), using the information provided in Table A (elevations for top of limestone unit, ground water elevation range and wells screen elevations). Please specifically evaluate the ability to sample well MW-2A during dry season conditions and compare the top of screen elevations at wells MW-7 and MW-9 with the top of the limestone unit encountered in the boring logs to determine if the depth of the wells is appropriate. Please also submit a revised application form that references the revised section of the GWMPE.

20. **M.1.f.(3):** Please submit a revised application form that references Section 2.0 of the GWMPE. The Department does not object to deleting many of the parameters from the quarterly sampling events as suggested in the revision to Section 2.0 of the GWMPE, however it is considered appropriate to maintain two indicator parameters that are characteristic of landfill leachate (chloride and sodium) and one parameter (fluoride) that has been reported to exceed the ground water standard in a previous sampling event. The anticipated list of parameters for routine quarterly events follows:

<u>Field Parameters</u>	<u>Laboratory Parameters</u>		
Static water levels	Chlorides	Aluminum	Mercury
before purging	Fluoride	Antimony	Silver
Specific conductivity	Nitrate	Cadmium	Sodium
pH	Total ammonia	Chromium	Thallium
Temperature	Total dissolved solids (TDS)	Iron	
Turbidity	Gross alpha	Lead	
Dissolved oxygen	Radium 226 + 228	Manganese	
Colors & sheens (by observation)			

The revised list of parameters for the annual sampling event (during fourth quarter of each year) provided in the revision to Section 2.0 of the GWMPE appears to be somewhat inconsistent with Rule 62-701.510(8)(a), F.A.C., and does not address some of the parameters that have been reported to exceed ground water standards in previous sampling events. The anticipated list of parameters for the annual sampling events follows:

<u>Field Parameters</u>	<u>Laboratory Parameters</u>	
Static water levels	Chlorides	Aluminum
before purging	Fluoride	Iron
Specific conductivity	Nitrate	Manganese
pH	Total ammonia	Mercury
Temperature	Total dissolved solids (TDS)	Sodium
Turbidity	<u>Those parameters listed in 40 CFR</u>	
Dissolved oxygen	<u>Part 258, Appendix I</u>	
Colors & sheens (by observation)	Gross alpha	
	Radium 226 + 228	

Please submit revisions to Section 2.0 of the GWMPE to include the lists of parameters for the quarterly and annual sampling events.

21. **M.1.g.:** Please submit a revised application form that references Section 6.0 of the GWMPE. The revisions to Section 6.0 and the addition of Appendix VIII of the GWMPE that present the procedures for implementing evaluation monitoring, prevention measures, and corrective action are noted.

22. **M.1.h. and M.1.h.(1):** The revision to this item of the application form to reference the *Engineering Report* is noted. Please submit additional revisions to the *Engineering Report* subsection entitled "Requirements of Section M" that reference the changes to Section 2.0 of the GWMPE regarding the anticipated parameters for the quarterly and annual ground water sampling events as requested in review comment No. 20.

23. **M.1.h.(2): Bi-annual report requirements signed, dated and sealed by P.G. or P.E.**  
(Rule 62-701.510.(9)(b), F.A.C.)

a. The revision to this item of the application form to reference the GWMPE is noted. **No additional information is requested.**

b. **GWMPE – Section 2.0:** The revised GWMPE does not include the well location map referenced as Figure 1 as requested in the March 25, 2003 RAI letter. The response to this review comment in the SEI letter references the attached maps without specifying their location in the submittal. It is assumed that the response refers to Appendix F of the *Operations Manual* that includes the figure entitled "Monitoring Well Map" and the drawing entitled "Overall Site Plan". It is noted that the figure and the drawing do not identify the location of the edge of the disposal units for the closed landfill phases or the compost pads as requested. Please submit revisions to the referenced figure and drawing to show the omitted information.

c. **GWMPE – Section 3.0**

- 1) The revisions to the ground water elevations provided in Table 1 are noted. **No additional information is requested.**
- 2) The revision to Table A (Monitor Well Construction Details) that indicate the ground water elevation reported for well MW-2 for the July 2001 sampling event (36.64 ft NGVD) was within the screened interval of the well is noted. **No additional information is requested.**
- 3) The revisions to the hydrograph provided in Appendix V of the revised GWMPE are noted. **No additional information is requested.**
- 4) The response in the CTL letter that references the revised sampling procedure is noted. **No additional information is requested.**

d. **GWMPE – Section 4.0**

- 1) The response in the CTL letter that indicates the extreme hydraulic gradient was measured during Quarter 4, 2002 is noted. **No additional information is requested.**
- 2) The response in the CTL letter that the horizontal hydraulic conductivity value used in the ground water velocity calculation was obtained from slug tests conducted on monitor wells located at the Sumter Recycling C&D facility (formerly known as the D&C facility) is noted. Please note that in the absence of site specific data to characterize hydraulic conductivity, quarterly ground water sampling frequency shall be required. **No additional information is requested.**

e. **GWMPE – Section 5.0:**

- 1) The revisions to the summary of analytical results in Appendix II for the specified ground water quality analyses are noted, however additional revisions are required to be consistent with the reports for the routine sampling events provided to the Department. Please review the apparent inconsistencies for the following sampling events and submit revisions to the quarterly reports or to the summary tables in Appendix II, as appropriate:

October 2000 -- pH at MW-2 (7.57 SU), MW-4 (5.53 SU), MW-6A (6.43 SU), MW-7 (7.02),  
MW-8 (6.44 SU), and MW-9 (5.92 SU)  
Ammonia at MW-8 (0.171 mg/L)

April 2001 -- Ammonia at MW-1 (0.036 mg/L), MW-2 (<0.02 mg/L), MW-4 (<0.02 mg/L),  
MW-6A (<0.02 mg/L), MW-7 (0.041 mg/L), MW-8 (0.029 mg/L), and  
MW-9 (0.12 mg/L)

- 2) The response in the SEI letter that references the drainfield locations on the attached figure (Appendix F of the *Operations Manual*, figure entitled "Monitoring Well Map" and drawing entitled "Overall Site Plan") is noted. However, the requested information to substantiate the potential for the septic drainfields to impact ground water quality at well MW-4 was not provided in Section 5.0 of the GWMPE, including: the direction of ground water flow between the drainfields and well MW-4; the calculation of the time required for ground water to migrate from the drainfields to well MW-4; and, the distance between the drainfields and well MW-4. In the absence of the requested information, the source of elevated nitrate at well MW-4 is considered to be the closed Class I landfill areas or the activities conducted with the processing of MSW at the facility, and it appears that evaluation monitoring is appropriate (Rule 62-701.510(7), F.A.C.). Please submit a site map that provides the proposed locations for additional monitor wells to determine the extent of the elevated nitrate at the facility and submit construction details for these proposed well locations (screen top/bottom elevation, screen slot size, sand pack size, method of installation and development, and distance from the edge of the landfill phases).

3) The response in the CTL letter that concentrations reported for nitrate and TDS at well MW-2 have declined during the sampling events conducted during 2003 is noted. Provided the results reported for future sampling events at well MW-2 continue to be below the ground water standard it is not considered appropriate to initiate evaluation monitoring for nitrate and TDS at this time. Please note the requirement of Rule 62-701.510(7)(a), F.A.C., that it is the permittee's responsibility to provide notification to the Department within 14 days of the receipt of data that indicates exceedances of ground water standards. Failure to provide timely notification of impacts to ground water quality is a violation of the solid waste rule and may be the basis for enforcement actions. This comment is provided for informational purposes and does not require a response. **No additional information is requested.**

Part N – Special Waste Handling Requirements (Rule 62-701.520, F.A.C.)

24. **N.1. through N.5.:** The revision to these items of the application form to indicate a "N/A" response is noted. **No additional information is requested.**

Part O – Gas Management System Requirements (Rule 62-701.530, F.A.C.)

25. **O.2.:** **Provide documentation that will describe locations, construction details and procedures for monitoring gas at ambient monitoring points and with soil monitoring probes** (Rule 62-701.530(2), F.A.C.)

a. The revision to this item of the application form to reference the *Engineering Report* is noted. It is also noted that the revisions to the "Supplemental Information for Long Term Care" subsection of the *Engineering Report* indicate that a supplemental study is being performed at the gas vents to determine if gas is still being generated within the closed landfill cells. Please submit an evaluation and the results of this supplemental study with the responses to this RAI letter and submit revisions to the *Engineering Report* regarding recommendations to maintain or terminate gas monitoring at the facility.

b. It is noted that the revisions to the Supplemental Information for Long Term Care subsection of the *Engineering Report* indicate that the perimeter gas probes do not extend to the depth of the waste in the landfill cells, however the requested discussion of the adequacy of these monitoring locations was not provided in the response to this review comment. Please submit an evaluation of the results of the supplemental gas study referenced in review comment No. 25.a. with the responses to this RAI letter and submit revisions to the *Engineering Report* regarding the adequacy of the existing perimeter gas probes and include recommendations regarding the need to install deeper gas probes. If appropriate, please submit a site map showing the existing and any proposed gas probe locations on a scale-drawn site map (no larger than 11x17 inches in a black and white format), and include identification numbers.

c. It is noted that the revisions to the Supplemental Information for Long Term Care subsection of the *Engineering Report* indicate that a supplemental gas study will include all site structures. Please submit an evaluation of the results of the supplemental gas study referenced in review comment No. 25.a. with the responses to this RAI letter and submit revisions to the *Engineering Report* regarding the ambient monitoring points at the facility. Please submit a site map showing the existing and any proposed ambient gas monitoring locations on a scale-drawn site map (no larger than 11x17 inches in a black and white format), and include identification numbers.

d. The checklist provided for the gas migration report conducted during 2002 in Attachment II of the GWMPE is noted. **No additional information is requested.**

Part P – Landfill Final Closure Requirements (Rule 62-701.600, F.A.C.)

26. **P.2.b.(5):** The revision to this item of the application form to reference the *Operations Manual* is noted. The addition of Section 5.0 (Long Term Care) to the *Operations Manual* is also noted. Please submit additional revisions to Section 5.3 of the *Operations Manual* to delete the reference to the Department's SOPs and insert a description of the procedures used to conduct the gas monitoring events at the facility (perimeter gas probes, gas vents, and ambient locations). Please ensure that the gas monitoring procedures address the requirements of Rule 62-701.530(2), F.A.C.



27. **P.3.d.:** The revision to this item of the application form to reference the *Engineering Report* is noted. It is noted that the revisions to the "Supplemental Information for Long Term Care" subsection of the *Engineering Report* indicate that a supplemental study is being performed at the gas vents to determine if gas is still being generated within the closed landfill cells. Please submit an evaluation and the results of this supplemental study with the responses to this RAI letter and submit revisions to the *Engineering Report* to substantiate the statement that the "gas vents are in proper working order".

28. **P.3.e.:** The revision to this item of the application form to reference the *Engineering Report* is noted. Please submit revisions to the *Engineering Report* subsections entitled "Report of Effectiveness of Landfill Design" and "General Maintenance for the Covered Area's of the Closed Class I Landfill" to respond to comment Nos. 5, 6 and 7 in Steve Morgan's letter dated November 7, 2003, provided under separate cover.

Part Q – Closure Procedures (Rule 62-701.610, F.A.C.)

29. **Q.3.:** The submittal of copies of the closure documents to Phases I, II and III in Section 7 of the submittal is noted. **No additional information is requested.**

30. **Q.4. through Q.7.:** The revision to these items of the application form to indicate a "N/A" response is noted. **No additional information is requested.**

Part R – Long Term Care Requirement (Rule 62-701.620, F.A.C.)

31. **R.3.:** The revision to this item of the application form to indicate a "N/A" response is noted. **No additional information is requested.**

32. **R.5.:** Please submit a revised application form for this item that indicates a "N/A" response since the long term care period has not been completed for the facility.

Part S – Financial Responsibility Requirements (Rule 62-701.630, F.A.C.)

33. **S.1.:** Please submit revisions to the Financial Responsibility (Section 8 of the renewal application) that respond to comment No. 15. in Steve Morgan's letter dated November 7, 2003, provided under separate cover.

NOTICE OF APPLICATION

34. The submittal of proof of publication of the Notice of Application via facsimile (received October 15, 2003) is noted. **No additional information is requested.**

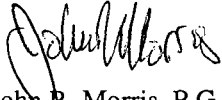
"NOTICE! Pursuant to the provisions of Section 120.60, F.S., if the Department does not receive a complete response to this request for information within 90 days of the date of this letter, the Department may issue a final order denying your application. You need to **respond within 30 days** after you received this letter, responding to all of the information requests 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 time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department may be grounds for the Department to issue a Final Order of Denial for lack of a timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant may reapply as soon as the requested information is available."

Mr. Garry Breeden  
Sumter County Closed Class I Landfill, Pending Permit No. 22926-003-SF

November 7, 2003  
Page 8 of 8

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 provide three copies of all permit application responses to the Department for review. Please provide all responses that relate to engineering or geological interpretation signed and sealed by the respective Florida-licensed professional. Please contact me at (813) 744-6100, extension 336, to discuss questions you may have about this letter.

Sincerely,



John R. Morris, P.G.  
Solid Waste Section

cc: David Springstead, P.E., Springstead Engineering, Inc., 727 So. 14<sup>th</sup> Street, Leesburg, FL 34748  
Ted Strouse, P.E., Central Testing Laboratories, Inc., 723 So. 14<sup>th</sup> Street, Leesburg, FL 34748  
Virginia Watson, Sumter County, 209 N. Florida Street, Bushnell, FL 33513  
Susan Pelz, P.E., FDEP Tampa  
Steve Morgan, FDEP Tampa



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: 126940-008-SC County: Sumter

Name of Project: Digester No. 2 and Infeed/Discharge

Name of Owner: Sumter County Public Works

Name of Engineer: Springstead Engineering, Inc.

Type of Project: Construction of the digester and the infeed and discharge areas to serve the digester.

Cost: Estimate \$ 2,500,000 Actual \$ 2,500,000

Site Design: Quantity: 200 ton/day Site Acreage: 120 Acres

Deviations from Plans and Application Approved by DEP: None. Please see attached photographs.

Address and Telephone No. of Site: \_\_\_\_\_

Name(s) of Site Supervisor: Lonnie Cash; Chuck Jett

Date Site inspection is requested: Week of October 20, 2003

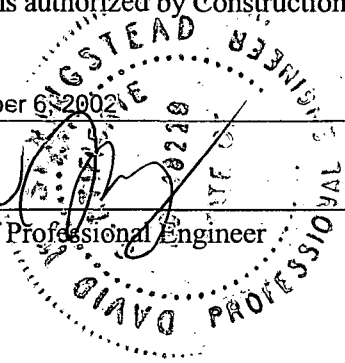
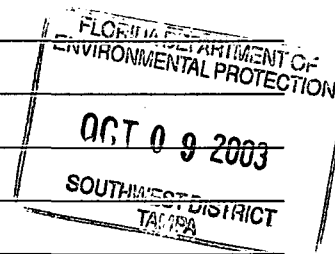
This is to certify that, with the exception of any deviation noted above, the construction of the project has been completed in substantial accordance with the plans authorized by Construction

Permit No. 126941-001-SO : Dated: September 6, 2002

Date: 10/8/03

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

*Sumter County Landfill*  
*Taken: October 3, 2003*



Aerial Photograph of MRF, Digester, Finish Building and Community Drop-off Area



*Sumter County Landfill  
Inspection Photographs  
Taken: October 3, 2003*



1) Looking west – Paved Community Drop-off Area (CDA)  
Wood Recycling Building at the far end.



2) Wood recycling building on west end of CDA

*Sumter County Landfill  
Inspection Photographs  
Taken: October 3, 2003*



3) Looking East – Paved CDA



4) Paved CDA – MW-2 located in a manhole on the paved pad.



*Sumter County Landfill  
Inspection Photographs  
Taken: October 3, 2003*



5) Paved CDA – MW-2 Manhole cover in place.



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

**CERTIFIED MAIL 7001 1940 0006 5800 9695**  
**RETURN RECEIPT REQUESTED**

Mr. Garry Breeden, Director  
Sumter County Public Works Department  
319 E. Anderson Avenue  
Bushnell, Fl. 34513

October 6, 2003

RE: Sumter County Composting, Processing, and Recycling Facility  
Sumterville, Sumter County  
Pending Permit No.: 126940-010-SO - Composting Facility  
Pending Permit No.: 126941-003-SO - Materials Processing Facility  
Pending Permit No.: 22926-003-SF - Closed Class I Long-Term Care

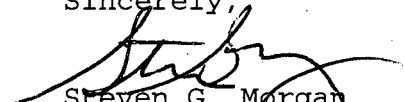
Dear Mr. Breeden:

On March 25, 2003, you were notified that your applications for permit renewal were incomplete. The required information necessary to complete your applications was itemized (copies attached).

When a permit application is incomplete, all processing of the application is suspended. Pursuant to Section 120.60, Florida Statutes, the Department may deny a permit application if the applicant, after receiving timely notice, fails to correct errors, omissions, or supply additional information within a reasonable period of time.

It has been 195 days since we notified you of the deficiencies in your application. Please provide a response sufficient to complete the pending applications, or your notice withdrawing the pending applications, by October 17, 2003. In the event that a sufficient response is not received by this date, the Department may deny the pending permit applications. Please remember that a permit must be obtained from this Department before you undertake the proposed work. If you should have any questions concerning this matter, please contact me at (813) 744-6100, extension 385.

Sincerely,

  
Steven G. Morgan  
Solid Waste Section  
Southwest District

sgm

Attachments

cc: David Springstead, P.E., Springstead Engineering 727 South 14<sup>th</sup> Street,  
Leesburg, Fl. 34748  
Francine Joyal, FDEP Tallahassee  
William Kutash, FDEP Tampa  
Susan Pelz, P.E., FDEP Tampa  
John Morris, P.G., FDEP Tampa

"More Protection, Less Process"



U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage	

Mailed  
10/7/03  
Postmark  
Here

**Sent To** Mr. Garry Breeden, Director  
**Street, Apt. No. or PO Box No.** Sumter County Public Works Dept.  
319 E. Anderson Avenue  
**City, State, ZIP** Bushnell, FL 34513

PS Form 3800, January 2000

7001 1940 0006 5800 9695

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

**3. Article Addressed to:**

Mr. Garry Breeden, Director  
Sumter County Public Works Dept.  
319 E. Anderson Avenue  
Bushnell, FL 34513

7001 1940 0006 5800 9695

**4b. Service Type**

- |  |   |
|--|---|
| <input type="checkbox"/> Registered                                | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail                              | <input type="checkbox"/> Insured              |
| <input checked="" type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD                  |

**7. Date of Delivery**

10-8-03

**5. Received By: (Print Name)**

Betty Combs

**6. Signature: (Addressee or Agent)**

X: Betty Combs

**8. Addressee's Address (Only if requested and fee is paid)**

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

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

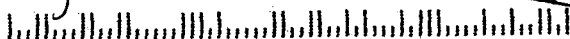
State of Florida  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619-1352

**D.E.P.**

OCT 10 2003

*Steve Morgan - Solid Waste*

Southwest District Tampa





# Springstead Engineering, Inc.

Consulting Engineers – Architects – Planners – Surveyors

EB - 0001723  
AA - 0002820  
LB - 0001723

727 South 14th Street  
Leesburg, Florida 34748

Lake (352) 787-1414  
Sumter (352) 793-3639  
Fax (352) 787-7221

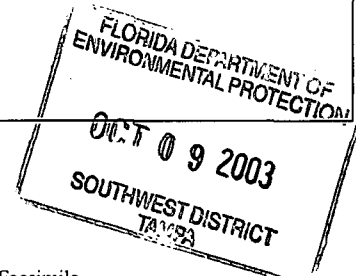
TO: *Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619*

Date: October 8, 2003

Job No.: 921100.021

Attention: *Mr. Steven Morgan, P.E.*

RE: *Sumter County Landfill*



## GENTLEMEN:

WE ARE SENDING YOU ☒ Enclosed ☐ under separate cover via \_\_\_\_\_ the following items:

☐ Shop Drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications ☐ Facsimile

☐ Copy of Letter ☐ Change Order ☐ \_\_\_\_\_

Copies	Date	No.	Description
3			<i>Response to Request for Additional Information for Sumter County Composting, Processing, and Recycling Facility - Pending Permit No.: 126940-010-SO - Composting Facility; Pending Permit No.: 126941-003-SO - Materials Processing Facility &amp; Pending Permit No.: 22926-003-SF - Closed Class I Long-Term Care with all required attachments (Signed &amp; Sealed)</i>
1			<i>Maintenance and Repair of Biomixers</i>
2			<i>Certification of Construction Completion of a Solid Waste Management Facility DEP Construction Permit No. 126941-001-SO - Citizen Drop-Off Area Construction (application, pictures &amp; record drawings)</i>
2			<i>Certification of Construction Completion of a Solid Waste Management Facility DEP Construction Permit No. 126940-008-SC - Digester No. 2 and Infeed/Discharge (application, pictures &amp; record drawings)</i>

## THESE ARE TRANSMITTED as checked below:

- ☒ For Approval ☐ Approved as submitted ☐ Approved for payment  
☐ For your use ☐ Approved as noted ☐ Resubmit \_\_\_ copies for approval  
☒ As Requested ☐ Returned for corrections  
☐ For Review and Comment ☐ \_\_\_\_\_  
☐ Material and/or prints returned after loan to us

## REMARKS:

## COPY TO:

Garry Breeden, SCPW

SIGNED: \_\_\_\_\_

*David W. Springstead, P.E.*



## **MEETING AGENDA**

**DATE:** May 28, 2003

**TIME:** 2:30 PM

**SUBJECT:** Sumter County Solid Waste Management Facility  
Permit Renewal Application & Facility Compliance Issues

### **AGENDA ITEMS**

#### **A. PERMIT APPLICATION OPERATION ISSUES**

- 1) Digester #2 Construction/Certification/Operation
- 2) Citizen Drop-off Area Construction/Certification/Operation
- 3) Financial Assurance
- 4) Temporary Loading Ramp
- 5) Exterior Compost Pads

#### **B. PERMIT APPLICATION LONG-TERM CARE ISSUES**

- 1) Groundwater Monitoring
- 2) Gas Monitoring
- 3) Monitoring/Maintenance Plan
- 4) Cover Maintenance

#### **C. COMPLIANCE RELATED PERMITTING ISSUES**

- 1) Odors Complaints and Control
- 2) Asphalt Cover Maintenance

#### **D. OTHER ISSUES**

Sunter Co

5/28/03

Digester Certification - ~~infeed~~ <sup>infeed/discharge</sup> - maybe submitted?  
tube haven't submitted

Citizen Drop Off Cert - DS will check on it  
- ramp, pole barn not built, attendant office  
word

Current appl -

- for operation of both digesters & CCC

Will provide a schedule for transition

- moving mem & pop to CCC
- both digesters

CCC - finish construction, certify

after we approve cert they can operate

under existing permit

- move ramp & pole barn  $\Rightarrow$  show on cert list as deviation

Digester #2 -

- need to build roots over infeed & discharge
- certify the entire unit (tube, infeed, discharge)
- start up testing done
- current Application will cover operation

Financial Assurance -

- revised ests & 3<sup>rd</sup> party
- they will re-look & recover mat'l
- biosolids, leachate, unfinished compost (in bldg)
- gutter monitoring frequency

### Temp loading ramp -

- may put ramp in "mom & pop" area after CCC Area is in service (30-45 days)
- interim  $\Rightarrow$  cleanup waste spillage immediately
- no operation in rain
- cover transfer trailer

### Exterior compost pads -

- compost wood chips on middle pad - public wood chips chipping
- finished compost on north pad

### Long-Term Care Permit -

#### Groundwater mon -

- Nitrate

- MW 4, MW 2

- MW 4 -

- CAP/CAR  $\Rightarrow$  Nitrate, iron, manganese, <sup>cadmium</sup> aluminum, <sup>lead</sup> thallium, <sup>antimony</sup>
- they will submit CAR as part of RAI response
- they ~~to~~ prefer to do assessment as part of permitting instead of CO
- should take all efforts to minimize turbidity  $\Rightarrow$  <sup>helps</sup> results

### Gas monitoring -

- will look at gas vents <sup>(monitor)</sup> to determine if gas still generated

- onsite structures - need to designate some from year to year



(gas monitoring cont'd)

- if gas vents not generating gas (over seasonal variation) quarterly

then no more gas

- if don't want to do that demonstration now, \*  
need to modify monitoring probes to  
depth of waste

\* or if vents show gas still generated

monitoring/maintenance plan

- plan  $\Rightarrow$  what activities, frequency? regarding,  
revegetating

- asphalt area

- need plan for reguarding

Odors -

- control plan  $\Rightarrow$

- misters

- enclosed building

- they will look @ alternate plans

~~The~~ DS will send fax w/schedule for submittal



P. O. Box 1066  
Bushnell, FL 33513  
(352) 793-3368  
(352) 568-0166 Fax

# Sumter County Solid Waste

## Fax

To: Steve Morgan

From: Chuck Jett

Fax:

Pages: 3 including Cover

Re:

Cc: Susan Pelz

☐ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle

Chuck Jett, Solid Waste Superintendent



P. O. Box 1066  
Bushnell, FL 33513  
(352) 793-3368  
(352) 568-0166 Fax

# Sumter County Solid Waste

## Fax

To: Susan Peiz

From: Chuck Jett

Fax:

Pages: 3 including Cover

Re:

Cc: Steve Morgan

☐ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle

Chuck Jett, Solid Waste Superintendent

**SLUDGE INCREASE****FISCAL YEAR 2003-2004**

	Wildwood	OMI	LSU	Clermont
October 03	192.09	146.59	143.83	29.07
November 03	148.78	107.14	212.78	53.83
December 03	212.73	190.88	161.26	31.01
January 04	251.64	128.98	260.89	0.00
February 04	187.17	196.06	228.31	0.00
March 04	241.56	167.13	118.56	0.00
April 04				
May 04				
June 04				
July 04				
August 04				
September 04				

*City of Wildwood Florida  
Wastewater Treatment Plant*

*Shipping Address: 1290 Industrial Drive Wildwood, Florida 34785*

*Mailing Address: 100 N. Main Street Wildwood, Florida 34785*

*William Bennett-Director*

*Telephone # 352-330-1349*

*Fax # 352-330-1350*

**CERTIFIED MAIL**

**7000 0600 0023 9895 0588**

April 7, 2004

Department of Environmental Protection

Ms. Stephanie O. Barrios

3804 Coconut Palm Drive

Tampa, FL 33619-8318

Dear Ms. Barrios:

Enclosed are the 1st Quarter Residuals Monitoring Report and Lab Analysis for the Wildwood Wastewater Treatment Plant.

Residuals are sent to the Sumter County Solid Waste Facility for processing, which is a Class B Process.

If you have any question, please call me at (352) 330-1349.

Sincerely,

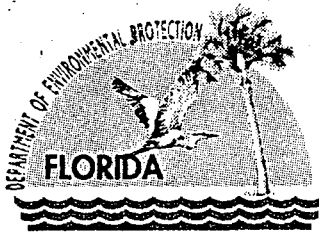


William Bennett

Wastewater Director

C: Jim Stevens, City Manager

Chuck Jett, Sumter County Solid Waste Facility



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

Sumter County Public Works Dept.  
Mr. Garry Breeden, Director  
319 E. Anderson Ave.  
Bushnell, Florida 33513

March 25, 2003

**Re: Sumter County Composting, Processing, & Recycling Facility,  
Sumterville, Sumter County  
Pending Permit No.: 126940-010-SO - Composting Facility  
Pending Permit No.: 126941-003-SO - Material Processing Facility  
Pending Permit No.: 22926-003-SF - Closed Class I Long-Term Care**

Dear Mr. Breeden:

This is to acknowledge receipt of the permit renewal applications prepared by Springstead Engineering, dated February 21, 2003, (received February 24, 2003), to operate a solid waste composting facility and a waste processing facility, and continue long-term care, monitoring, and maintenance for a closed Class I Landfill.

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.

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(8), F.A.C.** Please publish the attached Notice of Application and provide proof of publication to 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 7. - Location Coordinates:** The latitude/longitude coordinates provided in this section generally correspond to the center of the Sumter County site as a whole. Please verify the correct coordinates for the materials processing facility and provide a corrected page 1 of the application form.

b. **Section A. "General Information" Part 13. - Estimated Closure Costs:** Please provide the facility's revised closure cost estimate amount, calculated as required by Rule 62-701.630(4)(c), F.A.C., in this section of the application form. (see comment #21 below)

(Comment #2, cont'd)

- c. Section A. "General Information" Part 15.: Please verify the expected volume of waste to be received by submittal of the waste projection information required in accordance with Rule 62-701.710(2)(a), F.A.C. (see comment #2d below), and revise this section of the application form as appropriate.
  - d. Rule 62-701.710(2)(a), F.A.C. Application Form #62-701.900(4) Section B. "Additional Information" Part 1.: The "attached engineers report in Section 4" did not appear to include a projection of the waste types and quantities expected in future years, and the assumptions used to make the projections. Please provide this information along with the calculations used to support the projections.
  - e. Rules 62-701.710(2)(g) and 62-709.500(2)(c), F.A.C. Application Form #62-701.900(4) Section B. "Additional Information" Part 8.: Please identify the date of the topographic survey that is represented by the contours included on Overall Site Plan 1 of 1, dated February 21, 2003 and verify that the contours are representative of current site conditions.
3. Rule 62-701.320(7)(b), F.A.C. Application Form #62-701.900(10): 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 1.b. - Facility Location: The latitude/longitude coordinates provided in this section generally correspond to the center of the Sumter County site as a whole. Please verify the correct coordinates for the composting facility and provide a corrected page 1 of the application form.
  - b. Rule 62-701.320(8), F.A.C. Required Attachments - Proof of Publication: Please publish the attached Notice of Application and provide proof of publication to the Department. (See comment #1 above)
4. Rules 62-701.320(7)(d) and 62-709.300(3), F.A.C. Engineering Report: Please provide following additional information and revisions to the engineering report. Please provide a comprehensive engineering report that incorporates the responses to these comments.
- a. Engineering Report, Site History: This section states, "A second digester was completed in 2002, and a new community drop-off area was permitted and built in 2002." The Department has not received certification of construction completion for either of these facility components. Please provide Certification of Construction Completeness for Digester #2 in accordance with Specific Condition #5 of Composting Facility Digester #2 Permit #126940-008-SC and Certification of Construction Completeness for the Citizen's Drop-Off Center in accordance with Specific Condition #22 of Materials Processing Facility Permit #126941-001-SO. Alternatively, in the event that construction has not been completed, please provide information on the anticipated timeframes for completion of construction.
  - b. Engineering Report, Current Facility Status: This section and Operations Manual, Section 3.1.2 provide that the facility's hours of operation are 8 AM to 4 PM. The Compost Facility Data Form attached to Application Form #62-701.900(10) indicates that the facility's hours of operation are 7 AM to 4 PM. Please correct this discrepancy.

(Comment #4, cont'd)

- c. Engineering Report, Overview: This section states, "The only materials which are not weighed when entering the site are clean recyclables which can be dropped off in recycling bins prior to crossing the scale." Please explain how the facility determines and reports the total quantities of these materials received at the facility, in tons, if these materials are not weighed at the scales.
- d. Engineering Report, Overview: This section states, "... private citizens are directed to the new community drop-off area/processing area." However, recent facility inspections reveal that private citizens are still being directed to the "Isolated Homeowner Drop-off Area" within the MRF Processing Building, identified in Section 5 Appendix D of this permit application. Please clarify what areas the facility plans on utilizing for citizen drop-off and make revisions to this application and supporting information where appropriate.
- e. Engineering Report, Overview: There appears to be a typographic error in lines 2-3 of the second to last paragraph on page 2 of the Engineering Report.
- f. Engineering Report, Overview: This section states, "As this material falls into the hopper, the ram cycles and loads the first compartment of the digester. Based on the volume of the material entering the facility, the material will spend 24 to 72 hours in the digester. The temperature, moisture content, and level of material in each digester compartment will be measured at least daily." However Digester #2 has no separate compartments. Please provide a separate detailed description of waste handling and processing procedures in Digester #2, including the issues of waste loading; waste travel and retention time within the digester; and temperature, moisture content, and material level control.
- g. Engineering Report, Contingency Plan: Please provide a description of the contingency plan for the facility that addresses response to instances of operational interruptions, equipment failure, and emergencies such as fire, natural disasters, and severe weather conditions.
- h. Engineering Report, Contingency Plan: Inspections of the materials processing facility by Department personnel have noted a loading ramp located outside the north side of the MRF building, which has been utilized in the past to load waste from the tipping area into transfer vehicles for off-site disposal during instances of processing facility by-pass. This activity is not a part of your permitted contingency plan for the facility and the use of the loading ramp is not authorized under your current facility permit. Please verify that the use of this loading ramp has been discontinued and confirm whether or not you intend on permitting its proper construction and operation in the future.
- i. Engineering Report, Unauthorized Wastes: This section states, "Bins are provided for storage of unacceptable items..." and "If the source of the hazardous waste cannot be identified, it will be separated and placed in bins located inside the building." Please identify the location and types of these "bins".
- j. Engineering Report, Unauthorized Wastes: This section provides a description of how "hazardous waste" is identified and handled at "four check points". Please clarify how other non-hazardous unacceptable wastes are identified and handled at these "check points".



(Comment #4, cont'd)

k. Engineering Report, Unauthorized Wastes: Please identify in this section where the 250-gallon used oil tank and palletized lead acid batteries will be located at the facility.

l. Engineering Report, Closure Plan For The Facility: Please provide procedures for removal and disposal of unfinished compost located in the digesters and the finishing building, remaining biosolids, and leachate in the mixing basin as part of facility closure. Please identify the "reoccurred materials" referenced in this section.

m. Engineering Report, Additional Pertinent Information: The Department has received and confirmed reoccurring complaints of off-site odor associated with facility operations. Please provide procedures for evaluating and minimizing off-site odors associated with facility operations.

n. Engineering Report, Additional Pertinent Information: Please identify the facility operator(s), verify that they have completed the required training for certification as waste processing facility operator in accordance with Section 62-701.320(15)(b)2., F.A.C., and provide copies of certificates as appropriate. Please outline the number of trained spotters that will be located at the Citizen Drop-off Area and the Materials Processing Building tipping area, identify facility personnel that have completed training for certification as trained spotters in accordance with 62-701.320(15)(c), F.A.C., and provide copies of certificates of completion as appropriate.

o. Engineering Report, Water Quality and Leachate Monitoring Requirements: This section states, "The stormwater leachate collection ponds have been inspected annually and the results have been submitted to the Department." A review of Department records indicates that the referenced inspections have not been received by the Department. In addition, in accordance with Specific Condition #11c of Permit # 126941-001-SO, use of these ponds for leachate storage was discontinued in 1998. Please clarify and revise this section accordingly.

p. Engineering Report, Long-Term Care Requirements: This section states, "No changes have been made to the closed landfill." Please provide the investigation conducted to support this statement.

q. Engineering Report, Long-Term Care Requirements: Please explain what is meant by "recommended materials storage." Recent inspections of the facility by Department personnel noted that a portion of the closed landfill is still being utilized for materials storage. Please confirm that use of the closed landfill for storage of materials will be discontinued and specify the anticipated date that use of the closed area will cease.

r. Engineering Report, Landfill Final Closure Requirements: Please provide a copy of the "approved final closure procedures of the landfill". Alternatively, previously provided reports which are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number) for each item listed.

5. Section 4, Table 1 - Material Quantities For Recycling, Processing, and Composting Facility: Please verify that all material types, maximum storage quantities, storage methods, required area dimensions, and storage locations identified in Table 1 are consistent with locations and dimensions identified on the site plans for the facility and revise this table and/or the facility site plans accordingly.

6. Section 4, Supplemental Information For Long-term Care: Please provide following additional information in regard to this section:

- a. This section states, "The overall drainage design for the landfill, in general, is effective and has operated as designed." Please identify and provide a copy of the information that was used to support this conclusion.
- b. Please identify the referenced "available 50 acres" disposal area.
- c. Please clarify whether the "types of waste received" referenced in this section are waste currently received at the materials processing and composting facilities, waste previously disposed in the closed landfill areas, or both.
- d. Please confirm that use of Phase III of the closed landfill for recyclables storage will be discontinued and revise this section accordingly.

7. Section 4, Report of Effectiveness of Landfill Design: Please provide following additional information in regard to this section:

- a. Please provide a copy of the "geotechnical testing" which supports the conclusion presented in this section. Alternatively, previously provided reports which are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number) for each item listed.
- b. Please provide the supporting information that was used to substantiate the conclusion that "No settlement or sloughing has occurred due to foundation support."
- c. Inspections of the facility by the Department have noted chronic subsidence of the asphalt cover over Phase III and the outdoor finished compost storage pad, affecting drainage in the area. Please provide the supporting information that was used to substantiate the conclusion that "The drainage system has been effective and has operated as designed."
- d. Please provide the supporting information that was used to substantiate the conclusion that "This cover is effective for preventing the flow of water into the closed landfill system."
- e. Inspections of the facility by the Department have noted chronic problems with the integrity and condition of the asphalt cover over Phase III, due primarily to settlement and wear and tear from the facility's recycling activities in the area. Please provide the supporting information that was the basis for the conclusions that "The asphalt cover is generally in good condition," and "The asphalt cover is effective for preventing the flow of water into the closed landfill system."

8. Section 4, General Maintenance for the Covered Areas of the Closed Class I Landfill - Areas Covered with Liner, Soils, and Grass: Please verify that repairs are completed to match the designed slope of cover rather than the "existing slope of cover." Please provide the procedures used to verify that repairs are completed to match the designed slope of the cover. Please provide a copy of the map maintained by the facility director that notes areas of subsidence and repair.

9. Section 4, General Maintenance for the Covered Areas of the Closed Class I Landfill - Area Covered with Asphalt: In regard to maintenance of the asphalt cover, it is stated that "Repair of subsiding areas will consist of filling ... with limerock or recycled asphalt materials and covering the area with an impervious layer of asphalt to match the existing slope of the cover."

(Comment #9, cont'd)

Facility inspections have indicated that soils, rather than limerock, have been utilized in the past as part of cover repair. Please explain this discrepancy. Please verify that repairs are completed to match the designed slope of cover rather than the "existing slope of cover." Please outline the procedures used to verify that repairs are completed to match the designed slope of the cover. Please provide a copy of the map maintained by the facility director that notes areas of subsidence and repair.

10. Section 4, Volume Calculations for Finishing Building: Please provide a copy of a site plan for the finishing building that includes the proposed windrow configuration in the finishing building and a typical windrow cross-section. Alternatively, previously provided reports which are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number) for each item listed.

11. Rules 62-701.320(7)(e) and 62-701.710(2)(h), F.A.C. Sumter County Solid Waste Facility Operations Manual, February 2003: Please provide the following additional information and revisions to the facility operation plan. Please provide a comprehensive Operations Manual that incorporates the responses to these comments.

a. Operations Manual: The introduction of the manual states, "The Facility consists of four components: 1)Community Drop-off/Processing area ... 4)Compost Finishing Building." Please verify that the recyclables storage building and the outdoor finished compost storage pads are still components of the facility, revise this section accordingly, and provide specific operational requirements for these components of the facility in the Operation Manual, where appropriate.

b. Operations Manual, Section 1.1: Please verify that private citizen unloading no longer occurs in the "Isolated Homeowner Drop-off Area" or revise this section accordingly.

c. Operations Manual, Section 1.2: The Department has received and confirmed reoccurring complaints of off-site odor associated with facility operations. Please provide procedures for evaluating and minimizing off-site odors associated with facility operations.

d. Operations Manual, Section 1.3: This section states, "... Sumter County cleans the processing facility at the end of each day and avoids leaving waste on the tipping floor at the end of the day." Section 4, Engineering Report, Closure Plan For The Facility states, "The County will remove and dispose of all materials on the tipping floor (max 3 days of material)..." Please address this discrepancy and revise the documents accordingly.

e. Operations Manual, Section 1.7: Please identify the location where equipment maintenance occurs at the facility and outline the facility procedures for dealing with leaks, spills, and disposal of the typical fluids generated as part of equipment maintenance and repair.

f. Operations Manual, Section 2.2: Please identify the health and safety facilities located in or near the citizen drop-off area, compost finishing building, digester area, recyclable storage building, and outdoor finish compost pads.

g. Operations Manual, Section 3.1: Please verify that the facility still also accepts biosolids and revise this section accordingly.

(Comment #11, cont'd)

- h. Operations Manual, Section 3.1.3: Please verify that the facility still also accepts biosolids and revise this section and Attachment B accordingly.
- i. Operations Manual, Section 4.0: The introductory paragraph of this section states, "The Facility's operations ... is supplemented by Operations & Maintenance Manuals ... for the Processing Building/MRF and Compost Digester System." Please provide a copy of the operation and maintenance manual for Digester #2 provided by the contractor.
- j. Operations Manual, Section 4.2: This section states, "The MRF is designed to process 100 tons per 8 hour day ..." Application Form #62-701.900(4), Part A.15. indicates that the expected volume of waste to be received is 200 tons/day. Please explain the discrepancy.
- k. Operations Manual, Section 4.2: This section includes code numbers (e.g. C-100, B-300) that correspond to specific pieces of equipment or components of the Processing Building/MRF operations. Please either identify each component in the narrative of this section or provide a legend to Appendix D that identifies the components associated with each code number.
- l. Operations Manual, Section 4.2: This section states, "Before the aluminum cans are prepared and transported to market, the aluminum cans are run through the MRF again to mechanically remove contaminants." Please identify where in the process the aluminum cans are re-introduced.
- m. Operations Manual, Section 4.3: This section provides a general description of the digester system operations. However, the two digesters are not identical, and therefore their operations will not necessarily be the same. Please provide a description of the system's operations for each of the digesters in this section. Please provide a description of the conveyor system, outlining the flow of waste and the conditions and circumstances under which each of the conveyor system components is utilized.
- n. Operations Manual, Section 4.3: In the absence of compartments in Digester #2, please explain how the movement of the waste through Digester #2 is controlled and regulated.
- o. Operations Manual, Section 4.3: Recent inspections have noted improper drainage of the biosolids storage area. Please revise this section to include a description of the operation of the biosolids storage area, including drainage. Please specify the type of biosolids used in the process.
- p. Operations Manual, Section 4.4: Please revise this section to include a description of the operation of the outdoor finished compost storage pads.
- q. Operations Manual, Section 4.5: Please revise this section to provide a contingency plan that addresses plans and procedures to be implemented at each operational components of the facility in response to instances of operational interruptions, equipment failure, and emergencies such as fire, natural disasters, and severe weather conditions.

12. Section 5, Appendix A - Hazardous Waste Manual: This section states, "The hazardous materials [removed from the waste stream] are removed from the Facility during the County's Hazardous Waste Amnesty Days conducted once a year..." Please verify whether or not all hazardous materials removed from the waste stream are being stored at the facility for up to one year prior to disposal and whether that storage time is consistent with applicable hazardous waste regulations.
13. Section 5, Appendix B - Management of Special Wastes and Miscellaneous Materials: Please identify the specific location at the facility where each of the special wastes and miscellaneous materials are being managed and stored.
14. Section 5, Appendix B - Management of Special Wastes and Miscellaneous Materials: Please identify the location at the facility where yard waste mulching operations will be conducted and a description of how the mulching operation will be conducted in accordance with Rule 62-709.320, F.A.C., either in this section or in the facility's Operation Manual, as appropriate.
15. Section 5, Appendix B - Management of Special Wastes and Miscellaneous Materials: Please provide a detailed description of the facility's procedures for recycling automotive parts and recovering recyclable materials from electronics.
16. Section 5, Appendix B - Management of Special Wastes and Miscellaneous Materials: Please provide a description of the specific precautions and procedures used when removing the valves and releasing the remaining gas from propane tanks.
17. Section 5, Appendix C - Waste Quantity Report Form: This report form is inconsistent with the report form currently being utilized by the facility. Please verify that the facility intends to continue to use the current form or explain the rationale for changing to the previous format and revise this section accordingly.
18. Section 5, Appendices D & E: The reduced-sized copies of these plans are largely illegible. Please provide plan-sized copy of these plans. Alternatively, previously provided reports which are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number) for each item listed.
19. Section 5, Appendix D - MRF/Processing Building Schematic: This schematic identifies an "Isolated Homeowner Drop-Off Area." Please verify that this area is no longer intended for homeowner waste drop-off and revise this plan accordingly.
20. Sections 62-701.710(9)(a) and 62-709.530(3), F.A.C. Section 7, Waste Quantity Reports: Please provide the procedures for calculating quarterly "Waste Quantity Stored" and verify the calculated total reported quarterly for the reports included in this section.
21. Sections 62-701.710(2)(j) and 62-701.630(4)(c), F.A.C. Section 8, Financial Responsibility: Please provide following additional information:
  - a. Cost Estimate For Tipped Material: Please provide following additional information in regard to this section and revise accordingly:
    - 1) Please provide the calculations that support the assumptions of a maximum of 300 tons of waste on the tipping floor and a maximum of 300 tons in the digesters.

(Comment #21.a., cont'd)

2) Loading, hauling, and disposal costs for unfinished compost in the digester were included, but loading, hauling, and disposal costs for unfinished compost in the finishing building were not provided. Please revise the cost estimates to include costs for loading, hauling, and disposal of the maximum storage quantity of unfinished compost in the finishing building at the facility, along with supporting third party estimates.

3) Please provide a copy of the current third-party estimate that supports the stated \$57.35 per ton cost for loading, hauling, and disposal of Class I waste.

4) Loading, hauling, and disposal costs for biosolids and leachate at the facility were not provided. Please revise the cost estimates to include costs for loading, hauling, and disposal of the maximum storage quantity of these wastes at the facility, along with supporting third party estimates.

b. Cost For Removal of All Recovered Materials: Please provide following additional information in regard to this section and revise accordingly:

1) Disposal costs for all recovered materials at the facility were not provided. Please revise the cost estimates to include costs for disposal of the maximum storage quantity of all recovered materials at the facility.

2) The lump sum load/haul/dispose costs provided from Town & Country Refuse, Inc. assumes disposal of construction & demolition debris and therefore is inconsistent with the disposal of "aluminum" or "glass containers". Please provide revised cost estimates to include costs for loading, hauling, and disposal of these items at an appropriate recycling or disposal facility.

3) Please provide a copy of the current third-party estimate that supports the stated \$11.30 per ton cost for loading and hauling of "Processed Materials", "Non-Processables", and "C&D Materials."

4) Please provide a copy of the current third-party estimates that supports the stated "cost from vendor" to load, haul, and dispose of tires, lead-acid batteries, and used oil.

5) Please provide a copy of the current third-party estimate that supports the stated \$45.00 per ton cost for loading and hauling of "White Goods" and "Yard Waste."

c. Financial Assurance Cost Estimate Form: Please provide following additional information in regard to this form and revise accordingly:

1) The current groundwater monitoring plan provides for both quarterly and annual sampling of monitor wells. The form provides cost estimates for quarterly sampling only. Please explain this discrepancy and revise the estimate accordingly. Please provide a copy of the third-party laboratory quote that lists parameters, costs for QC samples, and reporting.

(Comment #21.c., cont'd)

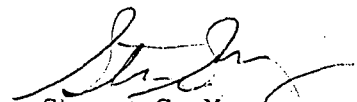
2) The unit cost estimates provided throughout the form reflect either no change or a decrease in the approved unit cost for long-term care activities from the facility's 1997 approved long-term care cost estimates. Please provide the calculations and current third-party estimates or references utilized to support and justify the provided estimates.

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 3 copies of your response to this letter as one complete package with an original and two 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

Attachment

cc: David Springstead, P.E., Springstead Engineering 727 South 14<sup>th</sup> Street, Leesburg, Fl.  
34748

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

Francine Joyal, FDEP Tallahassee

Susan Pelz, P.E., FDEP Tampa

John Morris, P.G., FDEP Tampa

62-110.106(5). Notices: General Requirements.

Each person who files an application for a Department permit or other notice as may publish or be required to publish a notice of application or other notice as set forth below in this section. Except as specifically provided otherwise in this paragraph, each person publishing such a notice under this section shall do so at his own expense in the legal advertisements section a newspaper of general circulation (i.e., one that meets the requirements of sections 50.011 and 50.031 of the Florida Statutes) in the county or counties in which the activity will take place or the effects of the Department's proposed action will occur, and shall provide proof of the publication to the Department within seven days of the publication.

62-110.106(6). If required, the notice shall be published by the applicant one time only within fourteen days after a complete application is filed and shall contain the name of the applicant, a brief description of the project and its location, the location of the application file, and the times when it is available for public inspection. The notice shall be prepared by the Department and shall comply with the following format:

**State of Florida  
Department of Environmental Protection  
Notice of Application**

The Department announces receipt of applications for permit renewal from the Sumter County Public Works Department for a permits to operate a Waste Processing Facility and Solid Waste Composting Facility and a permit for long-term care, monitoring, and maintenance of a closed Class I Landfill, subject to Department rules, at the Sumter County Recycling, Processsing, and Composting Facility located at 835 C.R. 529, Sumterville, in Sumter County, Florida.

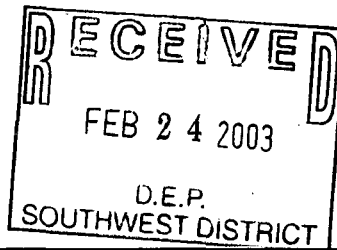
This application is being processed and is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-1352.





# Springstead Engineering, Inc.

Consulting Engineers – Architects – Planners – Surveyors



EB - 0001723

AA - 0002820

LB - 0001723

727 South 14th Street  
Leesburg, Florida 34748

Lake (352) 787-1414

Sumter (352) 793-3639

Fax (352) 787-7221

TO: Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Date: February 21, 2003

Job No.: 921100.020

Attention: Mr. Steven G. Morgan

RE: SC Materials Recovery and Volume Reduction Composting  
and Recycling Facility

## GENTLEMEN:

WE ARE SENDING YOU ☒ Enclosed

☐ under separate cover via \_\_\_\_\_ the following items:

☐ Shop Drawings

☐ Prints

☐ Plans

☐ Samples

☐ Specifications

☐ Facsimile

☐ Copy of Letter

☐ Change Order

☐ \_\_\_\_\_

Copies	Date	No.	Description
5			Application for renewal of Sumter County Materials Recovery and Volume Reduction Composting and Recycling Facility; plan sheet included (Signed & Sealed) includes: permit to operate solid waste mgmt facility, permit to operate a waste processing facility and application for permit to operate a solid waste management facility
3			Checks in the amount of \$100.00 to cover application fees along with letter and resolution (Check #5335, 5336 & 5337)
1			Copy of signature authorization letter

## THESE ARE TRANSMITTED as checked below:

☒ For Approval

☐ Approved as submitted

☐ Approved for payment

☐ For your use

☐ Approved as noted

☐ Resubmit \_\_\_\_ copies for approval

☐ As Requested

☐ Returned for corrections

☐ For Review and Comment

☐ \_\_\_\_\_

☐ Material and/or prints returned after loan to us

## REMARKS:

## COPY TO:

SIGNED: \_\_\_\_\_

David W. Springstead, P.E.

*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: 126940 - 010		
Project Name: SUMTER COUNTY WASTE REDUCTION FACILITY		
Type/Subcode: SO / 13		
Fee submitted: \$100	<input checked="" type="checkbox"/> correct	( ) incorrect
SMALL COUNTY FEE		
Total Fee Required \$ _____ Need \$ _____ Refund \$ _____		

Applicant Information

Name: GARY BREEDEN	
Role: DIRECTOR OF PUBLIC WORKS	
Company:	
Address: ON-FILE	
City:	Zip Code:
Phone:	

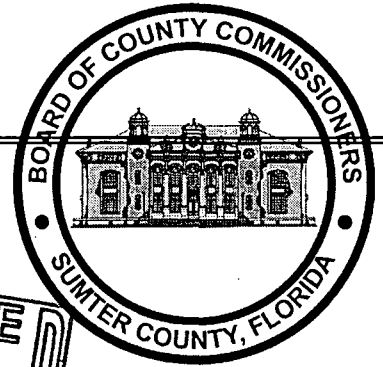
Fee verified by: S. MORGAN

Application Assigned To: \_\_\_\_\_ Date: \_\_\_\_\_

# Board of County Commissioners

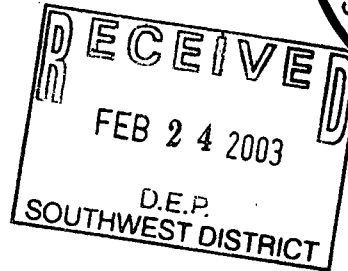
## Sumter County, Florida

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



February 21, 2003

Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619



RE: Sumter County Materials Recovery and  
Value Reduction Composting and Recycling Facility  
SEI File No. 921100.020

Dear Mr. Ford:

In compliance with Chapter 94-278, Florida Statutes, relating to permit fees for small counties, you will find attached herewith a resolution duly adopted by the Board of Sumter County Commissioners in open session.

I certify that the attached resolution specifically applies to the project listed above and request that the provision of the statute be used to calculate the appropriate permit fee.

Please contact me at the telephone number of letterhead address if you need additional information or clarification of this request.

Very truly yours,

OFFICE OF COUNTY ADMINISTRATOR

By Bernard Dew  
BERNARD DEW  
COUNTY ADMINISTRATOR

Enclosure

SUMTER COUNTY RESOLUTION

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF SUMTER COUNTY, FLORIDA, CERTIFYING A FISCAL HARDSHIP JUSTIFYING A WAIVER OR REDUCTION IN FEES BY FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION AND WATER MANAGEMENT DISTRICTS AND AUTHORIZING COUNTY ADMINISTRATOR BERNARD DEW TO APPLY FOR SUCH WAIVERS AND EXEMPTIONS PURSUANT TO SENATE BILL 1780.

WHEREAS, Sumter County has been at the 10 mil ad valorem limit for several years, and

WHEREAS, the Board has been required to pay various permit fees to Florida Department of Environmental Protection (DEP) and Southwest Florida Water Management District (SWFWMD), which permit fees have presented a fiscal hardship to the Board, and

WHEREAS, the Florida Legislature adopted Senate Bill 1780 which provides for exemptions and waivers of such permit fees to qualified counties and cities, and Sumter County qualifies under Section 1, subsection (4) and possibly other subsections.

NOW, THEREFORE, BE IT RESOLVED by the Board of County Commissioners of Sumter County, Florida, as follows:

1. Sumter County does hereby certify that the cost of permit processing fees from DEP and SWFWMD is a fiscal hardship due to the fact that Sumter County has been at the 10 mil ad valorem cap for the past several years.

2. County Administrator Bernard Dew is hereby authorized to formally apply for waivers and exemptions from such permit processing fees.

2. A copy of this resolution shall be spread among the minutes of this Board and shall be furnished to the DEP, SWFWMD

and such other appropriate authorities and agencies as needed.

DONE and RESOLVED at Bushnell, Sumter County, Florida, this  
24<sup>th</sup> day of May, 1994.

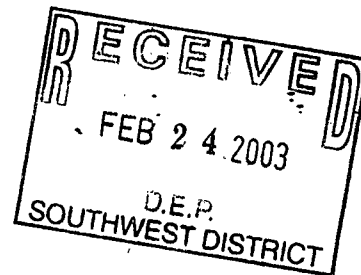
ATTEST: SARA H. MASON  
Clerk of Circuit Court



Jan K. Patrick  
Deputy Clerk

BOARD OF COUNTY COMMISSIONERS  
OF SUMTER COUNTY, FLORIDA

Jim Allen  
Jim Allen - Chair



# Board of County Commissioners

## Sumter County, Florida

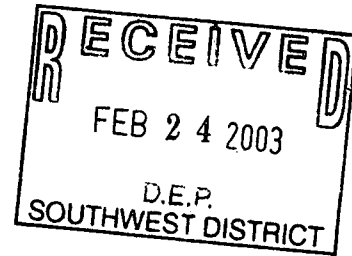
209 North Florida Street • Bushnell, FL 33513 • Phone (352) 793-0200 • FAX: (352) 793-0207 • SunCom: 665-0200  
<http://bocc.co.sumter.fl.us>



February 21, 2003

Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

RE: Sumter County Materials Recovery and  
Value Reduction Composting and Recycling Facility  
SEI File No. 921100.020



Dear Mr. Ford:

The Board of County Commissioners took action at their meeting of October 18, 1994, to authorize Mr. Garry Breeden, Director of Public Works to execute permit application as their authorized agent. A copy of the minutes of the Board Meeting are attached for your reference.

If you have any questions or need additional information regarding this matter, please do not hesitate to contact me.

Very truly yours,

OFFICE OF COUNTY ADMINISTRATOR

By Bernard Dew  
BERNARD DEW  
COUNTY ADMINISTRATOR

Enclosure

WATER CONTROL - ROADS, COUNTY

Garry Breeden, Director of Public Works, reported on the meeting with SWFWMD and residents of the Kal River Area, Croom. After discussion, Chairman Allen requested that Attorney Thornton look into the legalities of using gas tax money to provide assistance with design & application for exemption from SWFWMD.

COUNTY PROPERTY - ACCOUNTS ALLOWED - BIDS & PROPOSALS

Mr. Stephens moved to authorize payment of the following in connection with the renovation of the Sumter County Government Office Building, Wildwood:

1. Tom Barrow Company	\$2,620.84
2. Carrier of Florida	36,034.00
3. P.O. #17275, Primer, Coating	4,246.75
4. P.O. #17276, Carpet	25,548.20
5. Graybar Electric Co.	2,980.00
6. Carrier of Florida	4,438.00

The motion was seconded by Mr. Rutter and carried.

FEES - COUNTY PROPERTY - AGENCIES, STATE

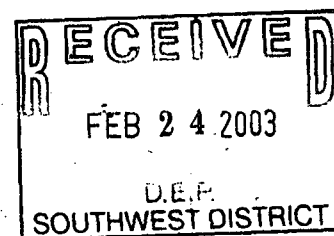
Mr. Rutter moved to approve payment in the amount of \$100.00 to the Department of Environmental Protection for permit fees for the waste water collection system, Sumter County Government Office Building, Wildwood. The motion was seconded by Mr. Stephens and carried.

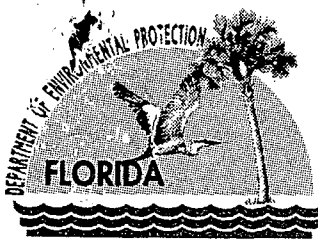
AGENCIES, STATE

Mr. Gideons moved to authorize a letter to the Department of Environmental Regulation advising that Garry Breeden, Director of Public Works, is authorized to execute permit requests. The motion was seconded by Mr. Stephens and carried.

CONTRACTS & AGREEMENTS - COUNTY PROPERTY - BIDS & PROPOSALS

Mr. Gideons moved to authorize the Chairman to execute an agreement with Pieco, Inc., for the construction of the public works vehicle fueling facility. The motion was seconded by Mr. Stephens and carried. (INSERT).





Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

**CERTIFIED MAIL 7001 1680 0006 6133 5124**  
**RETURN RECEIPT REQUESTED**

April 30, 2004

In the matter of an  
Application for Permit by:

**DEP File No. 126940-010-SO**  
Sumter County

Sumter County Public Works Department  
Mr. Benard Dew, County Manager  
209 N. Florida Avenue  
Bushnell, Florida 33513

## **NOTICE OF PERMIT**

Enclosed is Permit Number **126940-010-SO**, issued pursuant to  
Section(s) 403.087(1), Florida Statutes.

A person whose substantial interests are affected by this transfer of permits may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, 3900 Commonwealth Blvd., MS#35, Tallahassee, 32399-3000, within fourteen (14) days of receipt of this notice. 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 fourteen (14) days shall constitute a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes.

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 Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of 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 Petitioner, if any;
- (e) A statement of facts which petitioner contends warrants reversal or modification of the Department's action or proposed action;

*"More Protection, Less Process"*



PERMITTEE: Sumter County Public Works Dept.  
Mr. Bernard Dew, County Manager

PERMIT NO.: 126940-010-SO  
Composting Facility-Operation

- (f) A statement of which rules or statutes petitioner contends warrant reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action 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 notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication 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.

This permit 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 Rules 62-110 and 28-106, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

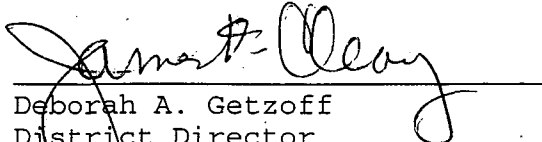
When the Order is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Blvd., MS#35, Tallahassee, 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.

PERMITTEE: Sumter County Public Works Dept.  
Mr. Bernard Dew, County Manager

PERMIT NO.: 126940-010-SO  
Composting Facility-Operation

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
Deborah A. Getzoff  
District Director  
Southwest District

DAG/sgm

Attachment

Copies furnished to:

Sumter County Elected Officials Notification

David Springstead, P.E., Springstead Engineering 727 South 14<sup>th</sup> Street,  
Leesburg, Fl. 34748

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

Francine Joyal, FDEP Tallahassee

Susan Pelz, P.E., FDEP Tampa

Douglas Beason, OGC Tallahassee

(Permit Notebook)

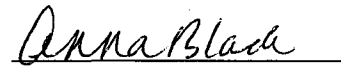
CERTIFICATE OF SERVICE

This undersigned duly designated deputy clerk hereby certifies  
that this NOTICE OF PERMIT and all copies were mailed before the close  
of business on April 30, 2004 to the listed persons.

(date stamp)

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant  
to Section 120.52(10), Florida  
Statutes, with the designated  
Department, Clerk, receipt of  
which is hereby acknowledged.

  
Clerk

4/30/04  
Date



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

## PERMITTEE

Sumter County Public Works Dept.  
Mr. Bernard Dew, County Manager  
209 N. Florida Ave.  
Bushnell, Florida 33513

## PERMIT/CERTIFICATION

WACS ID No: SWD-60-53088  
Permit No: **126940-010-SO**  
Date of Issue: **04/30/2004**  
Expiration Date: **05/01/2009**  
County: Sumter  
Lat/Long: 28°44'36"  
82°05'19"  
Sec/Town/Rge: 15/20S/22E  
Project: Sumter County  
Composting Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-520, 62-522, 62-550, 62-701, and 62-709, F.A.C. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To **operate** a solid waste Composting Facility (approximately 88 tons/day in Digester #1 and 121 tons/day in Digester #2), referred to as the Sumter County Solid Waste Management (Composting) Facility, subject to the specific and general conditions attached, for materials recovery, sorting and recycling, located 1 mile east of Interstate 75, along the south side of C.R. 470, north of Bushnell, Sumter County, Florida. The specific conditions attached are for the **operation** of:

### 1. Composting Facility

**Replaces Permits Number: 126940-001-SO, 126940-002-SC, and 126940-006-SC and modifications dated 6-18-98 and 10-22-98.**

This permit contains compliance items summarized in **Attachment 1** that shall be complied with and submitted to the Department by the dates noted. If the compliance dates are not met and submittals are not received by the Department on the dates noted, enforcement action may be initiated to assure compliance with the conditions of this permit.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.161, 403.727, or 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of rights, nor any infringement of federal, State, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under conditions of the permit;

**GENERAL CONDITIONS:**

(General Condition #7. cont.)

(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of noncompliance; and

(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 62-730.300, Florida Administrative Code, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

**GENERAL CONDITIONS:**

13. This permit also constitutes:
  - (a) Determination of Best Available Control Technology (BACT)
  - (b) Determination of Prevention of Significant Deterioration (PSD)
  - (c) Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
  - (d) Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
  - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    1. the date, exact place, and time of sampling or measurements;
    2. the person responsible for performing the sampling or measurements;
    3. the dates analyses were performed;
    4. the person responsible for performing the analyses;
    5. the analytical techniques or methods used;
    6. the results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. **Facility Designation.** This site shall be classified as a solid waste management facility for composting of solid waste materials and shall be constructed and operated in accordance with all applicable requirements of Chapters 62-3, 62-4, 62-330, 62-520, 62-522, 62-550, 62-701, and 62-709, Florida Administrative Code (F.A.C.) and all applicable requirements of Department Rules.

2. **Permit Application Documentation.** This permit is valid for **operation** of the composting facility (finishing building, digester, and related facilities) in accordance with the reports, plans and other information, submitted by **Springstead Engineering, Inc.**, as follows:

a. Application for Permit to Construct or Operate a Solid Waste Management Facility for the Production of Compost, dated February 21, 2003 (received February 24, 2003);

b. Response to request for additional information, dated October 7, 2003 (received October 9, 2003);

c. Response to request for additional information, dated January 30, 2004 (received February 2, 2004);

d. Additional information dated April 19, 2004 (received April 20, 2004);

e. Bedminster Digester System Operation and Maintenance Manual, dated January 13, 1997 (received February 24, 1997);

f. "Maintenance and Repair of BioMixers", A-C Equipment Services, received October 9, 2003.

g. Plan Sheets titled, Sumter County Solid Waste Management Facility MSW Compost Digester, signed and sealed December 24, 1996, including the following revised sheets:

1) Sheet 5 of 5 received February 18, 1997;

2) Sheet SUM EL01 received February 18, 1997;

h. Certification of Construction Completion, "Digester No.2 and Infeed/Discharge" dated January 29, 2004 (received January 30, 2004) including the following supporting information:

1) September 30, 2002 "Notice of Final Acceptance" letter from A-C Equipment Services to Sumter County;

2) December 18, 2003 "Confirmation of Construction of Digester" letter from A-C Equipment Services to Sumter County;

**SPECIFIC CONDITIONS:**

(Specific Condition #2.h., cont'd)

- 3) Plan Sheets titled, Installation & Assembly Drawings for 14'-0" I.D. x 185'-0" LG Rotary Biomixer (Plan Sheets Nos. 69-2120, 69-2121, 69-2127A, 69-4110B, 69-4133 through 69-1338, 69-4146A, 69-4146B, 69-4148, 69-4149, 69-4152A, 69-4154A, 69-4154B, 69-4155, 69-4157, 69-4158A, 69-4159A, 69-4160A, 69-4161A, 69-4162A, 69-4163, 69-4164, and 69-4167), prepared by A-C Equipment Services, received January 30, 2004;
- 4) Record Drawings titled, Sumter County Board of County Commissioners, F.O.R.C.E. Solid Waste Digester II, (Sheets 1 of 2 and 2 of 2), signed and sealed January 29, 2004 (received January 30, 2004);
- 5) Record Drawing titled, Sumter County Board of County Commissioners, Force, Infeed/Discharge Plan, signed and sealed January 29, 2004 (received January 30, 2004);
- 6) Record Drawings titled, Sumter County Board of County Commissioners, Composting Finishing Building Second Digester Bay Addition (Sheets 1 of 2 and 2 of 2), signed and sealed January 29, 2004 (received January 30, 2004);
- i. Plan Sheet titled, Sumter County Board of County Commissioners, Sumter County Composting Facility, Overall Site Plan, dated January 12, 2004 (received February 2, 2004);
- j. Plan Sheet titled, Sumter County Board of County Commissioners, Composting Building, Floor Plan, (Sheet 3 of 7) dated October 24, 1997 (received October 9, 2003);
- k. Plan Sheet titled, Sumter County Board of County Commissioners, Composting Building 2, Floor Plan, (Sheet 3 of 7) dated August 24, 1999 (received October 9, 2003);
- l. Engineering Report for Renewal of Operation Permits Sumter County Recycling, Processing, and Composting Facility Sumterville, Sumter County, Florida, revised April 2004 (received April 20, 2004);
- m. Sumter County Solid Waste Facility Operations Manual, revised January 2004 (received January 30, 2004), with revisions received April 20, 2004;
- n. 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);

and in accordance with all applicable requirements of Department rules, and



**SPECIFIC CONDITIONS:**

**3. Permit Modifications.**

a. This permit is valid for the operation of the finishing building, Digester #2, and related appurtenances (e.g. biofilter and scrubber). This permit authorizes the operation of Digester #1 only after the requirements of Specific Condition #7.a. have been completed and approved by the Department.

b. This permit does not authorize the management of waste tires, used oil or other special wastes (e.g. white goods, scrap metal) at the site. The management of these materials requires a separate permit.

c. Any construction, operation, or activities subject to Department Solid Waste regulations not previously approved as part of this permit shall require a separate Department permit unless the Department determines a permit modification to be more appropriate, or unless otherwise approved in writing by the Department. Permits shall be modified in accordance with the requirements of Rule 62-4.080, F.A.C. A modification, which is reasonably expected to lead to substantially different environmental impacts, which require a detailed review by the Department, is considered a substantial modification.

**4. Permit Renewal.** No later than **one hundred eighty (180) days** before the expiration of the Department Permit, the permittee shall apply for a renewal of a permit on forms and in a manner prescribed by the Department, in order to assure conformance with all applicable Department rules. Permits shall be renewed at least every five years as required by Rule 62-4.090, F.A.C. Operation permit renewal shall include, but not be limited to, an updated Operation Plan, Site Plans for existing site conditions, and revised (not inflation-adjusted) financial assurance cost estimates.

**5. Certification of Construction Completeness.** Within **thirty (30) days** after any specified construction has been completed (including construction associated with corrective actions to be conducted under Consent Order OGC Case #04-0131) and prior to operation, the following activities shall be completed and approved by the Department:

a. The owner or operator shall submit a Certification of Construction Completion, Form 62-701.900(2) (attached), signed and sealed by the professional engineer in charge of construction to the Department for approval, and shall arrange for Department representatives to inspect the construction in the company of the facility operator.

b. The owner or operator shall submit Record Drawings showing all changes (i.e. additions, deletions, revisions to the plans previously approved by the Department including site grades and elevations).

**SPECIFIC CONDITIONS:**

(Specific Condition #5., cont'd)

c. The owner or operator shall submit a narrative indicating all changes in plans and the cause of the deviations, and certification by the engineer of record to the Department.

d. The Record Documents shall include as-built surveys that demonstrate that construction has been completed at designed elevations and/or slopes, or as otherwise approved by the Department.

6. **Prohibitions.** The prohibitions of 62-701.300, F.A.C., shall not be violated at this site.

7. **Facility Operation Requirements.**

a. Composting of materials in Digester #1 shall not be resumed until:

1) A written detailed notification and description of the specific damage to Digester #1 and a specific a plan for corrective actions has been submitted to the Department for review and approval within **30 days** of permit issuance; and

2) Certification of construction completion for repairs to Digester #1 as specified by the approved plan for corrective action submitted under Specific Condition #7.a.(1) above, including the information required in accordance with Specific Condition #5. above, is submitted to and approved by the Department.

b. The permittee shall operate this facility in accordance with Chapter 62-709, F.A.C.; the information and drawings as listed in Specific Condition #2 above; the Operations Manual referenced in Specific Condition #2.m. above; and any other applicable requirements.

c. Waste or leachate shall not be stored in the "lined emergency storage cell."

d. Each finishing building floor (buildings #1 and #2) shall be sloped to the center as shown on the Compost Building Floor Plan plan sheets referenced in Specific Conditions #2.j. and 2.k. above. In the event that liquids accumulate on the floor, the liquids shall be removed by the end of the working day. These liquids may be placed back on the compost piles, may be removed for offsite disposal, or may be disposed of in another appropriate manner, as approved by the Department.

e. Litter shall be collected at least once daily.

**SPECIFIC CONDITIONS:**

(Specific Condition #7., cont'd)

f. In the event of extended downtime (greater than 72 hours) of equipment, or other emergency conditions, additional feedstock materials shall be not be placed in the digester system until equipment is operable, or in the case of an emergency, the emergency condition has ceased. In the event that the storage areas for the feedstock are at capacity, the additional feedstock materials shall be removed to an appropriate off-site disposal facility.

g. In order to minimize the potential for explosions and fires, explosive items (e.g. fireworks, ammunition, certain aerosol cans) shall be removed from the waste stream prior to processing in the digester unit.

h. All processed and unprocessed waste materials and compost additives shall be unloaded inside the building or into trucks or containers on paved areas within leachate containment. Spillage inside the building from the loading, unloading or sampling activities shall be cleaned up at the end of each business day. Spillage in the digester discharge area shall be cleaned up **immediately** upon completion of the loading, unloading or sampling activity (prior to continuing with other facility operations).

i. Leakage of fuels, oil, grease, other lubricants or fluids, from the digester equipment that is discharged to soils outside the building, or leachate collection system, shall be cleaned up **immediately** upon discovery (prior to continuing with other facility operations) and stored in a covered container for off-site disposal.

j. Dust shall be controlled at the facility to prevent potential fire hazards and nuisances.

k. Materials shall remain a minimum of 72 hours in the digester unit, at a minimum temperature of 141° F. (55° C.), with a target moisture content of 55% by weight, unless the permittee demonstrates that a reduced time period does not adversely affect the effectiveness of the composting process. The permittee may request Department approval of temporary reductions in the residence time for experimental purposes.

l. Composted materials, which utilize different feedstocks and additives, shall be cured, finished and stored in separate piles. These materials may be mixed or commingled after the finished compost analyses are received and the analyses demonstrate that the piles are the same classification of compost (pursuant to Rule 62-709.550, F.A.C.).

m. All domestic wastewater residuals received, stored, and utilized as a compost additive shall be classified as "Class A residuals", "Class AA residuals", or "Class B residuals", as defined by Rules 62-640.200 (8) through (10), F.A.C. respectively.

**SPECIFIC CONDITIONS:**

(Specific Condition #7., cont'd)

n. Compost which is produced from feedstocks that include domestic wastewater residuals shall meet the ceiling concentration limits listed in 40 CFR 503.13.

o. All compost additives (e.g. domestic wastewater residuals/sludge, animal manure, urea, lime, etc.) shall be stored in covered leakproof containers, or under roof in areas with leachate collection. Additives shall not be stored for greater than **ninety (90) days**. Additives shall be managed and stored in a manner that sufficiently controls odors or vectors.

p. The number, size, location and orientation of the windrows in the finishing building shall be in accordance with the window configuration as shown on the Compost Building Floor Plan plan sheets referenced in Specific Conditions #2.j. and 2.k. above.

q. Final screening of compost material shall be conducted inside the main finishing building or "lean to" portion of the building.

r. Finished compost materials shall be sampled and analyzed in accordance with Specific Condition #11.a. below. Finished compost for which test results have not been received, shall be stored separate from other materials (e.g. unfinished compost, residuals, etc.) until the test results are received. Finished compost, which is classified Types A, B and C may be stored on the outside asphalt pads after the test results are received, but each type shall be stored separately.

s. The outside asphalt pads shall not be used for composting without prior Department approval. The pads may only be used for storage of finished compost. [ref. SC#2.l. page 3].

**8. Effectiveness of Pathogen Destruction in Digester**

a. The facility shall demonstrate the effectiveness of each digester in the destruction of pathogens in accordance with Rule 62-701.200(34), F.A.C. and/or Department Guidance Memo #SWM-01.9 (copy attached) as follows:

1) Composite samples of the unfinished compost material shall be sampled at the discharge point of Digester #2 **quarterly for at least one year from permit issuance** (to start during the Quarter 2, 2004 quarterly finished compost sampling event) in accordance with Specific Condition #11.b. below.

2) Composite samples of unfinished compost material shall be sampled at the discharge point of Digester #1 **quarterly for at least one year from resuming operation of Digester #1** (to start during the next scheduled finished compost sampling event following resumption of operation of Digester #1) in accordance with Specific Condition #11.b. below.

**SPECIFIC CONDITIONS:**

(Specific Condition #8.a., cont'd)

- 3) An evaluation of the effectiveness of Digester #2 in the destruction of pathogens shall be submitted **by August 1, 2005**. This evaluation shall include a summary of the sampling and analytical results for the compost testing conducted in accordance with Specific Condition # 8.a.(1) above. Based on these results, this evaluation shall determine the appropriate frequency for subsequent routine sampling events (or discontinuance of sampling) and evaluate the adequacy of the permitted residence time and temperature in Digester #2 for destruction of pathogens in accordance with Rule 62-701.200(34), F.A.C. and/or Department Guidance Memo #SWM-01.9. The evaluation shall be sent to: Solid Waste Section, Department of Environmental Protection, Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-1352.
- 4) An evaluation of the effectiveness of Digester #1 in the destruction of pathogens shall be submitted **within 30 days of completion** of the sampling and analysis required in accordance with Specific Condition 8.a.(2) above. This evaluation shall include a summary of the sampling and analytical results for the compost testing conducted in accordance with Specific Condition # 8.a.(2) above. Based on these results, this evaluation shall determine the appropriate frequency for subsequent routine sampling events (or discontinuance of sampling) and evaluate the adequacy of the permitted residence time and temperature in Digester #1 for destruction of pathogens in accordance with Rule 62-701.200(34), F.A.C. and/or Department Guidance Memo #SWM-01.9. The evaluation shall be sent to: Solid Waste Section, Department of Environmental Protection, Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-1352.
- 5) The testing and analysis required by Specific Condition 11.b. below shall be continued beyond the initial one year unless otherwise approved by the Department.

**9. Scrubber and Biofilter.**

- a. At a minimum, the biofilter media shall be regenerated or replaced, **annually, by June 15th each year**, unless the permittee provides documentation to the Department that demonstrates that the biofilter efficiency has not significantly decreased for the previous year.
- b. The temperature of the air flow to the biofilter, the back pressure to the biofilter, and the biofilter bed depth shall be monitored to evaluate the efficiency of the unit.

**SPECIFIC CONDITIONS:**

(Specific Condition #9., cont'd)

c. Liquids which discharge from the scrubber shall be recirculated into the digester system, discharged to the leachate management system at the site, or removed for off-site disposal at a permitted wastewater treatment facility.

d. Liquids which discharge from the scrubber shall be sampled and analyzed to adequately demonstrate that the liquids are not a hazardous waste, and to monitor the effectiveness of the scrubber unit. The quality of the air flow to the scrubber and out of the scrubber shall be monitored to allow for the evaluation of the effectiveness of the scrubber unit.

**10. Operation Plan and Operating Record.**

a. Each facility owner or operator shall have an operational plan that meets the requirements of Rule 62-709.500(5), F.A.C. A copy of the Department approved permit, operational plan, construction reports and record drawings, and supporting information shall be kept at the facility at all times for reference and inspection. Operating records as required by Rule 62-709.530, F.A.C. are part of the operations plan, and shall also be maintained at the site.

b. Unless specified otherwise in this permit, all submittals, notifications, or requests for permit modification shall be provided to the Southwest District Solid Waste Section, 3804 Coconut Palm Drive, Tampa, Florida 33619.

c. Proposed changes to the current Department approved Operational Manual, referenced in Specific Condition 2.m. above shall be submitted in writing to the Department for review and may require a permit modification in accordance with Specific Condition #3. The Operational Manual shall be updated as operations change and for renewal of the permit. Revised pages shall be provided as replacement pages with revisions noted (deletions may be struckthrough [~~struckthrough~~] and additions may be shaded [shaded] or a similar method may be used) and each page numbered with the document title and date of revision.

**SPECIFIC CONDITIONS:**

**11. Compost Sampling.**

a. A composite sample of finished compost materials produces shall be sampled at **intervals of every 20,000 tons of compost produced or quarterly**, whichever occurs first, for analysis of the following parameters:

Parameter	Units	Method
Moisture	%	EPA 160.3
Total Nitrogen	% dry weight	EPA 351 and 353
Total Potassium	% dry weight	EPA 365
Total Potassium	% dry weight	EPA 3050/7610
Reduction in Organic Matter	%	EPA 160.4
Organic Matter	%	EPA 160.4
pH	standard units	EPA 9045
Foreign Matter	%	Rule 62-709.530(1)(f), F.A.C.
Arsenic	mg/kg dry weight	EPA 3050/7060
Cadmium	mg/kg dry weight	EPA 3050/7130
Copper	mg/kg dry weight	EPA 3050/7210
Lead	mg/kg dry weight	EPA 3050/7420
Mercury	mg/kg dry weight	EPA 3051/7471
Molybdenum	mg/kg dry weight	EPA 3050/7480
Nickel	mg/kg dry weight	EPA 3050/7520
Selenium	mg/kg dry weight	EPA 3050/7740
Zinc	mg/kg dry weight	EPA 3050/7950
Fecal Coliform	most probable number per gram volatile suspended solids (MPN/gm. VSS)	SM 908
	or	
	most probable number per gram total solids (MPN/gm. TS)	EPA 9221E or 9222D

b. A composite sample of the unfinished compost material at the discharge point of each digester shall be sampled **quarterly for at least one year**, for analysis of the following parameters:

Parameter	Units	Method
Moisture	%	EPA 160.3
Total Nitrogen	% dry weight	EPA 351 and 353
Total Potassium	% dry weight	EPA 365
Total Potassium	% dry weight	EPA 3050/7610
Reduction in Organic Matter	%	EPA 160.4
Organic Matter	%	EPA 160.4
pH	standard units	EPA 9045
Foreign Matter	%	Rule 62-709.530(1)(f), F.A.C.
Arsenic	mg/kg dry weight	EPA 3050/7060
Cadmium	mg/kg dry weight	EPA 3050/7130
Copper	mg/kg dry weight	EPA 3050/7210
Lead	mg/kg dry weight	EPA 3050/7420
Mercury	mg/kg dry weight	EPA 3051/7471
Molybdenum	mg/kg dry weight	EPA 3050/7480
Nickel	mg/kg dry weight	EPA 3050/7520
Selenium	mg/kg dry weight	EPA 3050/7740
Zinc	mg/kg dry weight	EPA 3050/7950
Fecal Coliform	most probable number per gram volatile suspended solids (MPN/gm. VSS)	SM 908
	or	
	most probable number per gram total solids (MPN/gm. TS)	EPA 9221E or 9222D

**SPECIFIC CONDITIONS:**

**12. Recordkeeping and Reporting.**

a. Unless otherwise specified, all records shall be maintained at the facility and copies provided to the Department upon request.

b. The owner or operator of the composting facility shall record, in tons (and cubic yards) per day, the amount of each material inputted into and removed from the digester system.

c. The owner or operator of the composting facility shall maintain documentation of the following information regarding domestic wastewater residuals received, stored, and utilized at the composting facility:

- 1) The wastewater treatment plant source for each load received;
- 2) The quantity, in tons (and cubic yards) of each load received and;
- 3) Documentation from the wastewater treatment plant source that specifies the residual classification (e.g. Class B, A, or AA) of each load, including supporting information utilized in determination of the classification.

d. The permittee shall maintain records on the quantity (tons and cubic yards) of material placed in windrows in the finishing building, the quantity of finished compost produced, and the length of time required to finish the compost.

e. The following information shall be recorded daily, compiled **monthly**, and submitted to the Department **quarterly**:

- 1) The quantity, in tons (and cubic yards) of each additive and feedstock material which are input into the digester, the quantity of materials removed from the digester, and the residual classification, if applicable. This information may be based on the average daily quantity for each month.
- 2) The total quantity (gallons) of make-up water, leachate, recirculated liquids or other liquids added to the digester system.
- 3) Moisture content and temperature reading results from each sampling port of the digester unit.
- 4) Which combination of air pollution control units were utilized, i.e. scrubber, biofilter.



**SPECIFIC CONDITIONS:**

(Specific Condition #12., cont'd)

f. The following information shall be submitted to the Department **quarterly**:

- 1) Analytical results for:
  - a) Scrubber discharge water;
  - b) Scrubber air discharge;
  - c) Finished compost; and
  - d) Unfinished compost at digester discharge points.
- 2) Average residence time for material in the digester each month.
- 3) Quantity of finished compost.

g. Reporting required by Specific Conditions #12.c. through f., above, shall be in accordance with the following schedule:

- 1) Activity from July 1st through September 30th, report due October 15th;
- 2) Activity from October 1st through December 31st, report due January 15th;
- 3) Activity from January 1st through March 31st, report due April 15th; and
- 4) Activity from April 1st through June 30th, report due July 15th.

**13. Monitoring of Waste.** The permittee shall not accept hazardous waste or any hazardous substance at this site. Hazardous wastes are wastes listed in 40 CFR 261 Subpart D as hazardous or are wastes characterized in 40 CFR 261 Subpart C as hazardous. Hazardous substances are those defined in Section 403.703, Florida Statute or in any other applicable state or federal law or administrative rule.

**14. Drainage Requirements.**

a. All areas shall be cleaned at the end of each day's operation, at a minimum, or as needed, to prevent odors and vectors. All washdown water shall be contained within the building(s) or leachate management system. Except for the center sump of the finishing buildings, floors shall be free of standing liquids. Materials in the finishing buildings (in-process, finished, in windrows, etc.) shall not be located in ponded water.

b. Except for discharges to the leachate management system, liquids shall not discharge from the digester system, finishing building, or feedstock storage areas at any time.

c. The "lean-to" portion of the finishing building shall be operated to prevent the accumulation of liquids in the digester discharge area. Liquids, which accumulate in this area, and have contacted waste, shall be managed as leachate.

**SPECIFIC CONDITIONS:**

15. **Closure Requirements.** The facility owner or operator shall notify the Department of the facility's closure, no later than **180 days prior** to the date when the facility is expected to close. The facility shall be closed in accordance with Rule 62-709.510(4), F.A.C.

16. **Financial Assurance.** Since the digester system is an integral part of the materials recovery facility (MRF) located at the site, the owner or operator shall provide financial assurance for this solid waste management facility, pursuant to Rules 62-4.110, and 62-701.710(7), F.A.C. The costs for loading, transportation and disposal of the maximum quantity of feedstock that may be at the facility at any time must be included with the financial assurance cost estimates for the MRF. All costs for closure and proof that the financial mechanism has been funded adequately shall be submitted **annually** shall be submitted in accordance with **Permit Number 126941-003-SO, Specific Condition #13**, or its successors.

17. **Control of Nuisance Conditions.**

a. The operating authority shall be responsible for the control of odors and fugitive particulates (dust) arising from this operation. Such control shall minimize the creation of nuisance conditions on adjoining property. Complaints received from the general public, and confirmed by Department personnel upon site inspection, shall constitute a nuisance condition, and the permittee must take immediate corrective action to abate the nuisance. The owner or operator shall control disease vectors so as to protect the public health and welfare.

b. To reduce the potential for the offsite migration of objectionable odors, the owner or operator shall:

1) Operate and maintain the odor abatement control system specified in Specific Condition #2.n. above;

2) Operate and maintain the scrubber and biofilter system in accordance with Specific Condition #9 above;

c. In the event that the measures required by Specific Condition #17.b., above, do not sufficiently abate the objectionable odors offsite, the owner or operator shall submit an odor abatement plan to the Department for approval. This plan shall include, at a minimum, a description of the proposed corrective actions and a schedule for implementation.

**SPECIFIC CONDITIONS:**

**18. Facility Maintenance and Repair.**

a. The site shall be properly maintained including building maintenance, and maintenance of equipment, drainage systems, leachate collection and removal systems, and stormwater systems.

b. Except for minor equipment repairs and maintenance, in the event of the following occurrences, the permittee shall **immediately (within 24 hours)** notify the Department of Environmental Protection explaining such occurrence and remedial measures to be taken and time needed for repairs:

- 1) Damage to any portion of the site facilities;
- 2) Failure of any portion of the associated systems;
- 3) Emergency incidents such as fires or explosions;
- 4) Extended downtime (greater than 72 hours) for any component of the digester system.

c. Written detailed notification, including a plan for corrective actions, shall be submitted to the Department **within seven (7) days** following the occurrence.

d. Within 48 hours of use, the Department shall be notified of operation of the digester by-pass system. The Department shall also be notified when normal operations utilizing the digester resume.

**19. Stormwater System.** The site shall continue to have a stormwater management system operated and maintained to prevent surface water flow into waste processing and storage areas. The stormwater management system shall be operated and maintained in accordance with Chapter 62-330, F.A.C., and any other applicable Department or water management district rules.

**20. Fire Safety.**

a. **Annually**, the permittee shall arrange for a fire safety inspection by the local fire protection authorities. The inspection shall be conducted no later than **June 15th** each year. The fire safety inspection report, which includes a statement from the local protection authorities that the site meets the requirements of the local fire protection authorities, shall be maintained at the facility for five years, and copies shall be provided to the Department upon request.

b. In the event that deficiencies are noted, **within 30 days** of completion, the permittee shall provide documentation to the Department indicating correction of any deficiencies noted in the annual Fire Safety Survey. The documentation shall include approval of the corrections by the local fire authority.

PERMITTEE: Sumter County Public Works Dept.  
Mr. Bernard Dew, County Manager

PERMIT NO.: 126940-010-SO  
Composting Facility-Operation

**SPECIFIC CONDITIONS:**

21. **Professional Certification.** Where required by Chapter 471 (P.E.) or Chapter 492 (P.G.), Florida Statutes, applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

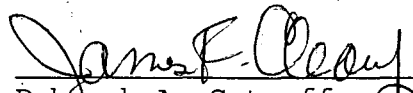
22. **General Conditions.** The permittee shall be aware of and operate under the "General Conditions". General Conditions are binding upon the permittee and enforceable pursuant to Chapter 403, Florida Statutes.

23. **Permit Acceptance.** By acceptance of this Permit, the Permittee certifies that he/she has read and understands the obligations imposed by the Specific and General Conditions contained herein and also including date of permit expiration and renewal deadlines. It is a violation of this permit for failure to comply with all conditions and deadlines.

24. **Regulations.** Chapter 62-709, F.A.C. (effective 10-22-00), and Chapter 62-701, F.A.C. (effective 5-27-01), are incorporated into this permit by reference. The permittee shall comply with all applicable requirements of Department rules.

Executed in Tampa, Florida

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
Deborah A. Getzoff  
District Director  
Southwest District

ATTACHMENT 1

SPECIFIC CONDITION	SUBMITTAL DUE DATE	REQUIRED ITEM
4.	180 days prior to permit expiration (November 1, 2008)	Permit Renewal Application
5.a., 5.b., 5.c., 5.d.	Within 30 days of completion of construction	Certification of Construction Completion submitted; Record Drawings submitted
7.a.1)	June 1, 2004	Report on damage to Digester #1 and corrective action plan
8.a.3)	August 1, 2005	Report of pathogen reduction effectiveness of Digester #2
9.a.	Annually, by June 15 <sup>th</sup> each year	Regenerate biofilter media
12.e., 12.f., 12.g.	Quarterly, by October 15th, January 15th, April 15th, and July 15th	Waste quantity reports, analytical results
13.	180 days prior to date of final material acceptance	Closure notification
16.	Annually	Revised financial assurance cost estimates, proof that financial mechanism is adequately funded
18.b.	Within 24 hours, of occurrence	Notification of failure of systems
18.c.	Within 7 days, of occurrence	Written notification & description of corrective actions
20.a.	Annually, by June 15th	Fire safety survey/inspection completed
20.b.	Within 30 days of completion	Documentation of approved completion of fire safety corrective actions

**Memorandum**

**Florida Department of  
Environmental Protection**

---

TO: District Waste Program Administrators

FROM: Richard B. Tedder, Program Administrator  
Solid Waste Section

Chris McGuire, Senior Assistant General Counsel  
Office of General Counsel

DATE: December 1, 2003

SUBJECT: Chapter 62-709 (Compost Rule) - Fecal Coliform Testing  
Memo # SWM-01.9

---

The definition of disinfection in Rule 62-701.200(34), Florida Administrative Code (F.A.C.), specifies that disinfection, as relates to composting, is the selective destruction of pathogens indicated by a reduction in indicator organisms to less than or equal to 100 fecal coliform Most Probable Number per gram of Volatile Suspended Solids (MPN/gram VSS). Rule 62-709.530(1)(c), F.A.C., specifies measuring fecal coliform as MPN/gram VSS using Test Method SM 908 found in "Standard Methods for the Examination of Water and Wastewater", 16<sup>th</sup> Edition, 1985. This value and test method were adopted into Chapter 62-709, F.A.C., when the Compost Rule was promulgated in 1989, and were based on the 1989 draft biosolids guidance and proposed federal regulations - 40 CFR Part 503.

It has come to our attention that there is a more representative measurement available for pathogen evaluation, specifically, 1,000 Most Probable Number per gram Total Solids (MPN/gram TS) - dry weight, using Test Methods 9221 E or 9222 D contained in "Standard Methods for the Examination of Water and Wastewater", 18<sup>th</sup> Edition, 1992. This reflects the final 503 regulations adopted in 1993. The Department intends to amend the existing target value in Chapter 62-701, F.A.C., and the test method specified in Chapter 62-709, F.A.C., to parallel the biosolids requirements by adopting the 1,000 MPN/gram TS criteria.

It is Department policy that the results of the MPN per gram TS test will be accepted in lieu of the currently specified MPN/gram VSS should any permittee wish to use MPN/gram TS until Chapters 62-701 and 62-709, F.A.C., are amended to reflect this. However, permittees are still allowed to use the currently specified criteria and method if they so choose until such changes are adopted.

Oracle Developer Forms Runtime - Web

Permits Events Payment Site Facility Party Lst Help Exit Window

ORACLE

Permitting Application - Permit Detail and Log Permit

### SITE Permit

Site Name SUMTER CO VOLUME REDUCTION FACILITY (COF) Site # 0126940

County SUMTER Comments II RPAs II #Cases 0

### Project

Permit# - Project# 010 Received 02/24/2003 CRA# 142136

Permit Office SWD (DISTRICT) Agency Action Pending

Project Name SUMTER CO VOLUME REDUCTION FAC Desc

Type/Sub/Des SO / 13 COMPOST-SOL WASTE/HOT YM COE#

Logged 02/26/2003 Issued Expires OGC

Fee 100.00 Fee Recd 100.00 Dele Override SMALL CO. WAIV

### Related Party

Role APPLICANT Begin 02/26/2003 End

Name BREDELL GARY Company SUMTER COUNTY PUBLIC WORKS DEPARTMENT

Address 319 E. ANDERSON AVE., 6

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

Phone 252-793-0240 Fax

### Processors

Processor MORGAN, S Y Active 02/26/2003 Inactive Events

Database has been successfully updated.

start 4 Internet E... Document1 2 Microsoft ... 12:56 PM

Oracle Developer Forms Runtime - Web

Query Coll Bats Rfind Exit CRA Window

ORACLE

Cash Receiving Application - Collection Point Log Remittance

### Collection Point Log Remittance

AREA **SWD** Tot **CRAF006A** **\$100.00**

Remittance **503541** Type \* **CP** Recvd Date \* **02/24/2003** Status **RECEIVED**

SYSROPT **407137** PNR  Check # \* **5335** Amount \* **100.00**

SSN/FEH#  Name \* **SPRINGSTEAD ENGINEERING, LLC.**

First  Middle  Title  Suf

Address1 **727 SOUTH 14TH STREET** Short Comments

Address2  **P-SW 126940-010**

City **LEESBURG** ST **FL** Zip **34748** Country

### PAYMENT(S)

Payment#	Distr CL Area	Object Code/Description	Payment Amount	Reference#	Applic Fund *	status
<b>540789</b>	<b>SWD</b>	<b>002245 SOLID WASTE-OPE</b>	<b>\$100.00</b>		<b>PA PFTF</b>	<b>COMPLETE</b>

COMMIT FREQUENTLY **\$100.00** Payment total

Press TAB to accept Collection Point or enter F&A

start 4 Internet E... Document1 - ... 2 Microsoft... 12:52 PM