

COMMENTS:

Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

FAX TRANSMITTAL LETTER

DATE: 3/16/90	-
TO: NAME: Kim Ford	
AGENCY: DER	
TELEPHONE: 813-272-2279	
NUMBER OF PAGES (INCLUDING COVER SHEET)	
NAME: Francine Joyal	
AGENCY: DER	
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IMMEDIATELY. PHONE NO. 922-6104 Sc 292-6104	
senders name: Brechy Davis	

RE: SUMTER COUNTY COMPOSTING FACILITY
MODIFICATION TO SC60-132071 PERMIT CONDITIONS

NOTE: None of the following suggested changes reflect leachate treatment and testing See modification request item No. 1 in February 21 letter from Paul Bradley.

29. The solid waste composting facility shall be designed, constructed, and tested by the permittee in accordance with the report submitted on February 22, 1988, by Springstead Engineering, Inc., plans submitted on March 9, 1988, and addended information submitted on March 17, 1988, and in accordance with all applicable requirements of Department rules. The permittee shall be allowed six (6) months for operating and testing to determine compliance with the rules and regulations of the Department. The Department may require such tests and evaluations of the facilities to be accomplished by the applicant at his expense.

SUGGESTED POSSIBLE CHANGE:

29. The solid waste composting facility shall be designed, constructed, and the leachate tested by the permittee in accordance with the report submitted on February 22, 1988, by Springstead Engineering, Inc., plans submitted on March 9, 1988, and addended information submitted on March 17, 1988, and in accordance with all applicable requirements of Department rules. The permittee shall be allowed six (6) months for operating and testing to determine compliance with the rules and regulations of the Department. The Department may require such tests and evaluations of the facilities to be accomplished by the applicant at his expense.

OR(IF COUNTY CAN COMPLY WITH NEW COMPOST RULE):

29. The solid waste composting facility shall be designed, constructed, and tested by the permittee in accordance with the report submitted on February 22, 1988, by Springstead Engineering, Inc., plans submitted on March 9, 1988, and addended information submitted on March 17, 1988, and in accordance with all applicable requirements of Department rules:operated in accordance with Rules 17-709.500 and 17-709.510, F. A. C. The permittee shall be allowed six (6) months for operating and testing to determine compliance with the rules and regulations of the Department. The Department may require such tests and evaluations of the facilities to be accomplished by the applicant at his expense.

NOTE: Rule 17-709.500, F. A. C., requires leachate meet applicable standards of Rules 17-3 and 17-4, F.A.C., at the point of discharge.

- 30. Adequate equipment and reserve equipment shall be available for the mixing and turning of the windrow piles.
- 31. Each windrow pile shall be composted for a minimum of 15 consecutive days at an internal core temperature of 55 degrees Celsius ($^{\circ}$ C) and be completely turned at least 5 times during this fifteen day period.

SUGGESTED POSSIBLE CHANGE:

31. Each windrow pile shall be composted for a minimum of 15 consecutive days at an internal core temperature of 55 degrees Celsius (°C) and be completely

turned at least 5 4 times during this fifteen day period.

NOTE: This reflects disinfection as defined in Rule 17-709.200(6), F.A.C.

- 32. If odors are determined to be a nuisance at the sites boundaries, or if rainfall damages the final curing piles, odor controls or waterproof covers shall be provided.
- 33. A monthly operation report shall be submitted to the Department by the fifteenth (15) of the succeeding month.

SUGGESTED POSSIBLE CHANGE:

. . .

- 33. A monthly operation An annual report shall be submitted to the Department by the fifteenth (15) of the succeeding month. by June 1 of each year in accordance with Rule 17-709.530(3), F. A. C.
- 34. At least 30 days prior to sampling and testing of the leachate or the compost, the permittee shall obtain Department approval of both the laboratory that will perform the testing, as well as the related QA/QC Plan, for all of the parameters to be tested.

SUGGESTED POSSIBLE CHANGE:

34. At least 30 days prior to sampling and testing of the leachate or the compost, the permittee shall obtain Department approval of both the laboratory that will perform the testing, as well as the related QA/QC Plan, for all of the parameters to be tested. Sampling and testing of the finished compost shall be in accordance with Rule 17-709.530(1), F. A. C. A copy of the test results shall be submitted to the Department within 30 days of sample collection. Note that Rule 17-709.530(1)(e), F. A. C., requires that sample collection, preservation, and analysis be pursuant to a Department-approved quality assurance plan.

NOTE: As worded, this does not address testing of the leachate.

35. At least 30 days prior to sampling and testing of the leachate or compost, the permittee shall submit an adequate plan for compost pathogen testing.

SUGGESTED POSSIBLE CHANGE:

- 35. At least 30 days prior to sampling and testing of the leachate or compost, the permittee shall submit an adequate plan for compost pathogen testing. The finished compost shall comply with disinfection as defined in Rule 17-709.200(6), F. A. C.
- 36. Within the first 60 days of composting activities, the permittee shall submit an adequate standard operating procedures manual to describe daily operations, the complete composting process, and equipment. The manual should describe composting times, temperature, moisture content and controls, turning and handling. The manual should describe the reuse of leachate and the addition

of bacteria.

37. At least 10 days prior to each day designated for sampling and testing of the leachate or the compost, the permittee shall notify the Solid Waste Section of this office of the day designated for sampling and testing.

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- 38. All required submittals shall be sent to the Department of Environmental Regulation, c/o Solid Waste Section, 4520 Oak Fair Blvd., Tampa, FL 33610-7347. Upon receipt and review of the required data, the Department will determine conditions for continued testing.
- 39. Technical criteria for composting as described in Chapter 12 of EPA 625/1-79-011, "Process Design Manual for Sludge Treatment and Disposal" and in EPA 625/4-85-014, "Composting of Municipal Wastewater Sludges", should be used as guidance for the composting operations.
- 40. Finished compost shall achieve a fecal coliform count of less than 2400 colonies/gram utilizing the most probable number (MPN) technique before final compost distribution of utilization.

SUGGESTED POSSIBLE CHANGE:

- 40. Finished compost shall achieve a fecal coliform count of less than 2400 colonies/gram utilizing the most probable number (MPN) technique before final compost distribution of utilization. The composting facility and the resulting compost product shall be in accordance with Rule(s) ...
 - a) <u>17-709</u>, F. A. C.
 - b) $\overline{17-709.510}$ and 17-709.530, F. A. C.
 - c) 17-709.510, 17-709.530, 17-709.550, and 17-709.600, F. A. C.

NOTE: 17-709.510 is operating criteria which also includes operating and maintaining design features pursuant to 17-709.500--design criteria. 17-709.530 is testing, recording and reporting criteria. 17-709.550 is the classification criteria. 17-709.600 is the use criteria. ALSO, THIS MAY BE REDUNDANT IF CONDITION NO. 29 IS CHANGED TO REFER TO 17-709.510.

SUGGESTED POSSIBLE CHANGE:

41. The finished compost accumulated and stored at the facility prior to March 1, 1990, shall either be tested in accordance with Rule 17-709.530(1), F. A. C., or shall be reprocessed with incoming solid waste and run through the composting process a second time.