From:	Rush, Kim
To:	Christiansen, Jim
Cc:	Rush, Kim; Lubozynski, Tom; "Grant, Sheree"; Perez, Deborah
Subject:	Biosolids Compost - Question about Doing This at Vista Landfill
Date:	Monday, December 15, 2014 11:25:00 AM
Attachments:	PermitModRequestPackage_FINAL.pdf biosolids permit 10 17 2013.pdf

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Jim,

In response to your request for a determination whether a similar biosolids composting operation at Vista could be permitted in the same way as the Okeechobee Landfill's operation, the Department has discussed internally and determined that yes, the permit for Vista could be similar.

Rule 62-709.300(6)(c), F.A.C. states:

(c) Composting facilities that process domestic wastewater residuals with yard trash; these are regulated under Chapter 62-640, F.A.C. Composting facilities that process domestic wastewater residuals with other solid wastes are regulated under this chapter. However, nothing in this chapter shall relieve such facilities from complying with other applicable federal or state rules or regulations regarding domestic wastewater residuals management.

Therefore, the Department could permit a biosolids composting operation at Vista as part of the existing solid waste permit since the composting operations at Vista, similar to Ockeechobee Landfill, involves 'other solid wastes' (meaning pre-consumer waste, manure, etc.).

Please note, at this time the incorporation of a biosolids composting operation into the existing solid waste permit would restrict the permit duration to 5 years upon renewal. Our legal department is analyzing the Solid Waste and Waste Water Rules to determine if an extended permit time frame is applicable (10 years or 20 years).

When you are ready to begin the permitting process for Vista, please contact me to set up a pre-application meeting with the Central District Solid Waste and Waste Water departments.

Thank you and Merry Christmas,

Kimberly Rush, P.E.
Solid Waste and Air Permitting
Florida Department of Environmental Protection
3319 Maguire Blvd. Ste 232
Orlando, FL 32803-3767
Phone: (407) 897-4314

From: Christiansen, Jim [mailto:JChristi@wm.com]
Sent: Thursday, November 20, 2014 1:47 PM
To: Lubozynski, Tom
Cc: Grant, Sheree; Perez, Deborah
Subject: Biosolids Compost Permitting Information

Tom – Thanks for the time with the whole team today.

Here is both our application and the resulting permit for our biosolids & organics composting operation at Okeechobee LF. The permit is an appendix to our landfill solid waste permit. The proposed operation at Vista would be similar, though we have only discussed it in concept at this point.

We are requesting a determination from the Central District on whether a similar operation at Vista LF could be permitted in the same way, and if not, what proposed approach is recommended. We would also like any technical guidance you can offer on the proposed permit mod application package. We worked extensively with both the SE District Wastewater Program, Richard and team, and the wastewater folks in Tallahassee on the process and technical approach we used at Okeechobee. The outcome made good sense to us and seems to be working well, and avoided the need for another stand-alone permit. We would of course plan to have a pre app meeting to discuss details.

We did a pilot program at Okeechobee before permitting that helped establish the efficacy of the monitoring and process; we may or may not consider a pilot for different reasons at Vista, but more likely not.

We still need to run the concept by Jay in Apopka as well, but plan to do so soon.

Thanks for the help.

Jim Christiansen
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