

Sarasota Food Compost  
permit**Pelz, Susan**

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**From:** Ford, Kim  
**Sent:** Wednesday, March 31, 2004 11:42 AM  
**To:** Pelz, Susan  
**Subject:** conversation with Cory Jamison and Jessie White about Sarasota Composting and panel discussion

On 3/31/04 at 10:40am I spoke with Cory Jamison about his phone call and e-mail. Cory expressed an interest in someone from the district being on a panel to discuss opinion of the food composting operations and permitting for the Sarasota facility. I explained that I would not be planning to come because it is not normally what I do and if he feels that it is more important than he may want to call Susan. I explained that it is up to Susan whether someone goes or not and I asked if Francine was coming. Cory said yes. I asked if there had been some resolution of what is required for the design of such facilities and he said no and that is what he wants us for the panel for to express our opinions. I said I did not really have an opinion and had not reviewed the results or been involved since the facility was approved for the operation at Sarasota. Cory said that Jessie wanted to talk to me. Jessie asked why I was not coming. I said that is not normally what I do and Susan would decide if someone would attend. Jessie asked if I would attend if Susan wanted me to. I said of course, and that obviously it is important so he would need to decide whether he wanted to call Susan. He asked me if Susan wanted to know if someone should go what would I say. I said Susan is familiar with the project and would probably not ask me that and I had not really been involved since the facility was approved. I explained [to either Jessie or Cory] that I had not reviewed any test results and asked if someone put the results together and who has them, and I was told that Francine has them. I explained that unless there is a new policy, the same would probably be expected of the next facility design and I did not think that was what those that are interested would want to hear and suggested that he may want to discuss such rules and policies with someone in Tallahassee before the meeting. I said that I did not think that it would be appropriate for me to speak for the entire state on the rules and policies regarding these type of facilities. Jessie said that he wanted our district there because we have the reputation of being strict with the rules and that Susan and I make a good team, and he was concerned about a strict interpretation and rules rather than the intent of the rules. I said I sort of understand and I would like to get notes from Francine from the meeting. Jessie said thanks and was glad that I called so that things would not just fall through. I said that I would tell Susan that he may be calling her. I said that I was only trying to be courteous and returning the call, and that I hope his meeting goes well.

Kim Ford  
FDEP - Tampa  
Solid Waste Section  
(813) 744-6100, 382  
[kim.ford@dep.state.fl.us](mailto:kim.ford@dep.state.fl.us)

Department of  
Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

INFORMATION REQUEST

TO:

FRANCINE JOYAL

SOLID WASTE PROGRAM

DEPT. TALLAHASSEE

We are pleased to send the enclosed information you requested.

If we can be of further service, please contact:

Kim B. Ford, P.E.  
Solid Waste Section  
Waste Management Division  
3804 Coconut Palm Drive  
Tampa, FL 33619-8318  
(813) 744-6100, ext. 382

COMMENTS:

Food Compost Letter

for 1/20/04

Project Manager

Attachments

cc: Franklin Coggins, Manager, SWO  
Jean Nutter, Sarasota County  
Jessie White, President, Resource Management Group, Inc.

D.E.P.

JAN 14 2004

Southwest District Tampa

in operating since June  
conducted as described  
a will be provided to

y December 31 of 2003.  
distribution area in  
low for ease of  
a schedule.

9.550. This material  
in commercial and  
ached is all pertinent

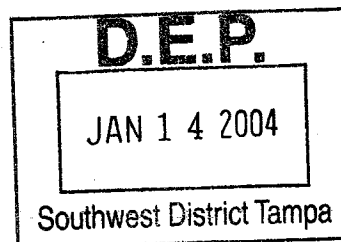
. It is planned for  
ger than sixty (60)



## SARASOTA COUNTY

"Dedicated to Quality Service"

*Susan 1/12/04  
Any comments? o/c  
du*



January 13, 2004

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Re: Food Waste Recycling Facility  
Permit #2008-19-001-SO

Dear Mr. Ford:

Sarasota County's permitted food waste recycling facility has been operating since June of 2003. Sampling of solids and leachate at the facility has been conducted as described in the Sampling and Analysis, May 27<sup>th</sup>, 2003. A summary of data will be provided to the Department at the conclusion of the project.

As you may be aware, the project team agreed to vacate the site by December 31 of 2003. This letter is to inform you of a plan to move mature compost to a distribution area in another location of the solid waste disposal complex. This will allow for ease of distribution and Sarasota County can continue with their operation schedule.

The mature compost is Class B Material, according to FAC 62-709.550. This material will not be made available to the general public, but will be used in commercial and horticultural trials, managed by RMG for market assessment. Attached is all pertinent analytical data.

A total of 50 – 60 yards of material will be moved and distributed. It is planned for distribution by January 31, 2004, but will remain onsite for no longer than sixty (60) days.

Please contact us with your comments or questions.

Very truly yours,

*Paul A. Wingler*  
Paul A. Wingler, P.E.  
Project Manager

Attachments

cc: Franklin Coggins, Manager, SWO  
Jean Nutter, Sarasota County  
Jessie White, President, Resource Management Group, Inc.

I:\ccswdf\Shared\Administration\Correspondance\FDEP\FordFoodWasteRecycling2004.doc

Lab #: 225890 Sample of: COMPOST  
Date Received: 10-Dec-2003 Status: PRELIMINARY

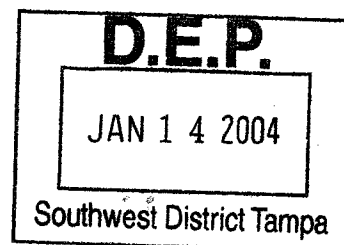
Client: Resource Management Group, Inc.

Compost - Composite

Client: Resource Mgmt Group, Inc.

Id #120903COM

Sampled by J Cory Jamieson on 12/09/03 @ 1340 hrs.



Method	Parameter	Result	Units
	Moisture, Air Dried	34.3	%
	ANALYSIS ON DRY BASIS	-	
Screen Test	Foreign Matter, Retained on 1/4" Screen	6.34	%
Screen Test	Bones, % of total compost	0	%
Screen Test	Glass, % of total compost	0.37	%
Screen Test	Leather, % of total compost	0	%
Screen Test	Metal, % of total compost	0	%
Screen Test	Plastic, % of total compost	0	%
Screen Test	Rubber, % of total compost	0	%
Screen Test	Other, % of total compost	5.97	%





ELAB, Inc.

8 East Tower Cr., Ormond Beach, FL 32174-8759

Date: 17-Dec-03

## Analytical Report

CLIENT: Sarasota County  
 Lab Order: F03120338  
 Project: Compost/Screened  
 Lab ID: F03120338-001

Client Sample ID: 120903 COM  
 Collection Date: 12/9/2003 12:43:00 PM  
 Sample Description: compost  
 Matrix: Soil

Analyses	Result	Qual	RL Units	DF	Date Analyzed	Batch ID
<b>NITROGEN, NITRATE-NITRITE</b>		<b>CE-81-1</b>	PrepDate: 12/16/2003 10:30:00		Analyst: TSHE	
Nitrogen, Nitrate-Nitrite	190		38 mg/kg-dry	5	12/17/2003 10:18:39 AM	16037
<b>NITROGEN, TOTAL</b>		<b>SM4500-N C</b>	PrepDate:		Analyst: SST	
Nitrogen, Total	5700		5.0 mg/Kg	1	12/17/2003 1:00:00 PM	R21457
<b>NITROGEN, TOTAL KJELDAHL</b>		<b>CE-81-1</b>	PrepDate: 12/11/2003 8:45:00		Analyst: SST	
Nitrogen, Kjeldahl, Total	5500		99 mg/kg	1	12/11/2003 5:57:45 PM	15940
<b>PH IN SOIL</b>		<b>SW9045</b>	PrepDate:		Analyst: MMA	
pH	7.94	Q	0.100 pH Units	1	12/10/2003 5:00:00 PM	R21243
<b>PHOSPHORUS, TOTAL</b>		<b>CE-81-1</b>	PrepDate: 12/11/2003 8:45:00		Analyst: SST	
Phosphorus, Total (as P)	1000		20 mg/kg	1	12/11/2003 5:57:45 PM	15940
<b>SOLIDS, PERCENT MOISTURE</b>		<b>D2216</b>	PrepDate:		Analyst: MDE	
Percent Moisture	34.43		0.10 wt%	1	12/11/2003	R21286
<b>SOLIDS, VOLATILE</b>		<b>E160.4</b>	PrepDate:		Analyst: MDE	
Solids, Total Volatile	33		5.0 %	1	12/11/2003	R21366
<b>ICP METALS</b>		<b>SW6010</b>	PrepDate: 12/11/2003 11:56:00		Analyst: JCO	
Cadmium	0.27	I	0.31 mg/Kg-dry	5	12/16/2003	15943
Copper	10		1.6 mg/Kg-dry	5	12/16/2003	15943
Lead	3.7		1.6 mg/Kg-dry	5	12/16/2003	15943
Nickel	3.2		1.6 mg/Kg-dry	5	12/16/2003	15943
Potassium	4500		160 mg/Kg-dry	5	12/16/2003	15943
Zinc	40		6.2 mg/Kg-dry	5	12/16/2003	15943

Data I Analyte detected below quantitation limits  
 Qualifier U Not Detected Above the MDL  
 Code Key:

Q Holding times for preparation or analysis exceeded  
 V Analyte detected in the associated Method Blank

ELAB, Inc.

8 East Tower Cr., Ormond Beach, FL 32174-8759

Date: 17-Dec-03

## Analytical Report

CLIENT: Sarasota County  
 Lab Order: F03120338  
 Project: Compost/Screened  
 Lab ID: F03120338-002

Client Sample ID: 120903FLDBLK  
 Collection Date: 12/9/2003 12:49:00 PM  
 Sample Description: Field Blank  
 Matrix: Waste Water

Analyses	Result	Qual	RL Units	DF	Date Analyzed	Batch ID
<b>NITROGEN, NITRATE-NITRITE</b>		<b>E353.2</b>	PrepDate:		Analyst: TSHE	
Nitrogen, Nitrate-Nitrite	0.019	I	0.050 mg/L	1	12/17/2003 9:25:48 AM	R21434
<b>NITROGEN, TOTAL</b>		<b>SM4500-N C</b>	PrepDate:		Analyst: SST	
Nitrogen, Total	0.50	U	0.50 mg/L	1	12/17/2003 1:00:00 PM	R21457
<b>NITROGEN, TOTAL KJELDAHL</b>		<b>E351.2</b>	PrepDate: 12/11/2003 8:45:00		Analyst: SST	
Nitrogen, Kjeldahl, Total	0.50	U	0.50 mg/L	1	12/11/2003 5:04:43 PM	15941
<b>PH</b>		<b>E150.1</b>	PrepDate:		Analyst: MMA	
pH	5.09	Q	0.100 pH units	1	12/10/2003 4:55:00 PM	R21243
<b>PHOSPHORUS, TOTAL</b>		<b>E365.4</b>	PrepDate: 12/11/2003 8:45:00		Analyst: SST	
Phosphorus, Total (as P)	0.020	I	0.10 mg/L	1	12/11/2003 5:04:43 PM	15941
<b>SOLIDS, TOTAL DISSOLVED</b>		<b>E160.1</b>	PrepDate: 12/11/2003		Analyst: MMA	
Solids, Total Dissolved	5.0	U	5.0 mg/L	1	12/11/2003	15950
<b>ICP METALS</b>		<b>SW6010</b>	PrepDate: 12/11/2003 8:34:00		Analyst: JCO	
Cadmium	1.0	U	1.0 mg/L	1	12/11/2003 6:14:00 PM	15924
Copper	0.62	IV	5.0 mg/L	1	12/11/2003 6:14:00 PM	15924
Lead	5.0	U	5.0 mg/L	1	12/11/2003 6:14:00 PM	15924
Nickel	5.0	U	5.0 mg/L	1	12/11/2003 6:14:00 PM	15924
Potassium	500	U	500 mg/L	1	12/11/2003 6:14:00 PM	15924
Zinc	20	U	20 mg/L	1	12/11/2003 6:14:00 PM	15924

Data I Analyte detected below quantitation limits  
 Qualifier U Not Detected Above the MDL  
 Code Key:

Q Holding times for preparation or analysis exceeded  
 V Analyte detected in the associated Method Blank



## SARASOTA COUNTY

"Dedicated to Quality Service"

*Handwritten:* L. J. R. 9/10/27



September 5, 2003

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Re: Food Composting Facility Operation - CCSWDC  
Permit No. 200819-001-SO

Dear Mr. Ford:

Sarasota County's permitted food waste recycling facility (permit #200819-001-SO) has been operating as permitted over the past three months. The project team has collected a total of 22 tons of waste, and filled 8 small Ag-Bags. Sampling of solids and leachate at the facility has been proceeding as described in the Sampling and Analysis Plan of May 27, 2003. A summary of data collected will be provided to the Department at the conclusion of the project.

This letter is to inform you of a planned modification to the current sampling and analysis plan. This modification is scheduled to occur after the last solid waste collection at the facility on September 17, 2003 and is planned to continue for three months thereafter.

Based on the quality of sampling to date, the project team intends to simulate windrow composting to provide leaching data that is relevant without the Ag-Bag system. This will entail constructing an exposed pile of 1-5 tons of food waste combined with yard waste on the existing concrete pad. Details of this design and its goals are included in the attached document. Please provide your recommendations and comments. We will be distributing this information to the sampling plan advisory committee for feedback as well.

If you have any questions, please contact me directly at (941) 861-1578.

Thank you for your input.

Sincerely,

*Handwritten signature:* PA Wingler

Paul A. Wingler, P.E.  
Project Manager

Attachments

# **Food Recovery Project IG1-14 Sampling and Analysis Plan Amendment**

Submitted August 15, 2003

SEP 11 2003

## **Introduction**

This document is an amendment to the Sampling and Analysis Plan for Grant IG1-14 submitted to the department May 27th, 2003. Sarasota County and Resource Management Group, Inc. have implemented the plan submitted May 2003. This document provides additional information on a sampling schematic not developed in the original plan.

## **Purpose**

Processing and composting of food wastes can be accomplished with a variety of products and technologies. Windrowing is a well established and cost effective composting method. The technique does leave much of the materials exposed to the environment however. The intent of the sampling and analysis plan is to examine and describe the potential environmental impacts of a food waste recycling facility. To this end, the current plan amendment attempts to develop a sampling design around the environmental impacts of windrow composting.

Another area that this sampling plan amendment will address is quantification of volume of analytes of concern. What would the impacts be if there was not a leachate collection system in place? This kind of question can only be addressed by a modified sampling schedule.

Currently the sampling has revealed that some analytes are present, but the total volume of leachate being generated is variable and difficult to measure. Investigating this data can reveal what type of mitigation needs to take place for the analytes present. Further, mature or semi mature compost likely does not exhibit the same leaching characteristics of freshly ground and mixed material. The differences in these materials could be valuable in assessing the way in which they are categorized and treated from a regulatory standpoint.

## **Design**

The receiving pad will operate on September 17<sup>th</sup>, 2003 as normal and will process the last collection of food waste (estimated between 1 and 2 tons). This waste will be combined with yard waste at a ratio of 3:1 yard waste to food by volume and placed in a small windrow in the middle of the pad. This material will then be covered with another layer of yard waste to a depth of one foot. The receiving pad will then be cleaned off and cleared of all processing equipment.

Systems will be put in place to mitigate for vectors prior to building the windrow. These will include a low voltage wire strung 6" above ground around the perimeter of the experimental area and a synthetic netting suspended above the pad. Please see figure 1 for the site design.

The sampling will be done during rain events only. Water will flow from the pile or pad into the leachate collection system. An autosampler will be employed to take samples at timed intervals (10 min) during rain events. The autosampler will extract samples from the leachate pipe leaving the receiving pad.

Rainfall will automatically initiate the sampling timer through an attached raingauge. The autosampler will conform to applicable sections of FDEP SOP 001/01 for sampling equipment materials and will cool the samples for preservation. A maximum of 24 discrete grab samples will be taken over the course of the rain event and will be collected in 1 liter polyethylene bottles. These will then be used to transfer sample material to bottles containing appropriate preservatives supplied by ELAB, Inc.

An accurate estimate of the leaching characteristics of a fresh food and yard waste composting pile will be determined by combining rain event data with exposed surface area data from the analytic pile, flow data through the collection system, and concentration data from the samples collected. This data will then be extrapolated to estimate the total effluent of a given constituent for a facility of given size and throughput per rain event or even per year.

### **Analytes of Concern**

Current sampling and analysis has revealed that the parameters of concern are likely to be nutrients, specifically nitrogen and phosphorus. These nutrients will be analyzed in various forms to assess their potential impact on surface or groundwater.

Other inorganic and physical parameters will also be examined. These will more broadly characterize the effluent in general and provide data that can corroborate other information. For example, biological and chemical oxygen demands (BOD and COD) should give an estimation of the amount of activity that occurs in the runoff as is. Metals will also be analyzed for to be certain they are not present in high levels. A complete list of parameters is found below in Table 1.

Table 1 – Parameters for analysis

pH
Turbidity
Conductivity
BOD5 - Biochemical Oxygen Demand
COD - Chemical Oxygen Demand
Nitrogen, Total
Nitrogen, Ammonia
Nitrogen, Kjeldahl
Nitrogen, Nitrate
Nitrogen, Nitrite
Phosphorous, Total
Total Hardness
Antimony.
Arsenic
Barium
Beryllium
Cadmium
Chromium
Cobalt
Copper
Iron
Lead
Mercury
Nickel
Selenium
Silver
Sodium
Thallium
Vanadium
Zinc

Ford, Kim

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**From:** Joyal, Francine  
**Sent:** Thursday, July 17, 2003 2:01 PM  
**To:** 'Cory Jamieson'  
**Cc:** 'Jesse White'; Boroff, Suzanne; Pelz, Susan; Ford, Kim; 'Jean Nutter'; 'Bob Sleep'; 'Paul Wingler'  
**Subject:** RE: Sarasota Composting Pilot - Timeline and Collections

Cory,

You mentioned time constraints at the landfill. I am curious about what those time constraints are, since I do not recall them being mentioned. Here are my comments to the questions:

1. Will this amount of total material give us an accurate representation of the program?

I believe you mean the 50 tons of total material to be processed. It is hard to say how accurate a representation it will be without knowing how variable the analytical data is. But it appears that the other potential variable will not be address -- seasonal variability. Optimally, a year's worth of data would be more desirable.

2. Will it provide information enough to evaluate the process from an objective standpoint?

I can not answer this either for the same reason as above -- data and seasonal variability. But even if a complete evaluation in not possible, it should provide information currently not available about this Florida waste stream.

3. Is there a magic number of tons that would be ideal to reach?

I know of no magic number for tons. How representative is the amount collected to the waste stream being generated? I think this is an evaluation and discussion we look forward to seeing in the final project report.

Francine

-----Original Message-----

**From:** Cory Jamieson [mailto:cory@rmg.us]  
**Sent:** Tuesday, July 15, 2003 5:20 PM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** Sarasota Composting Pilot - Timeline and Collections

Dear associates,

We have reached the half way mark on the collections and processing segments of our food waste recycling project. Some updates:

- \* We have collected and processed approximately 15 tons of food waste from local generators, combined this with equal weight of yard waste, and filled 100 feet of bag.
- \* Operational challenges continue to be encountered and overcome
- \* Sampling continues according to the submitted plan at a rate of approximately 1 waste and 1 leachate sample per week

At this point we would like to get your feedback to aid in our evaluation of the project to date and get your insights into possible modifications for the remainder of the collections period.

The collection volumes are lower than previously anticipated. We are getting data however, and the collections we are getting are relatively uncontaminated with unwanted materials (plastic, styrofoam, etc.). We are planning to continue working with generators to divert as much as possible from their waste streams.

We estimate at current collection volume and frequency that we will process a total of 25-30 tons of waste (50 when combined with yard waste) by the end of the project. Because of time constraints at the landfill we plan on completing the receiving portion of the project by late August/early September. Will this amount of total material give us an accurate representation of the program? Will it provide information enough to evaluate the process from an objective standpoint? Is there a magic number of tons that would be ideal to reach?

Please let us know if you have ideas or comments.

Thank you all very much for your support throughout this project. -Cory

Cory Jamieson  
Environmental Specialist  
Resource Management Group, Inc.  
1143 Central Ave,  
Sarasota, FL 34236  
ph: 941 358-7730  
fx: 941 362-4290  
cory@rmg.us



**Ford, Kim**

---

**From:** Pelz, Susan  
**Sent:** Tuesday, June 10, 2003 7:18 AM  
**To:** 'Cory Jamieson'; Joyal, Francine; Ford, Kim  
**Subject:** RE: Sampling and analysis plan - Sarasota County Food Waste Recycling project

This looks good. I look forward to seeing the results of the study.

Susan

-----Original Message-----

**From:** Cory Jamieson [mailto:cory@rmg.us]  
**Sent:** Monday, June 02, 2003 10:20 AM  
**To:** Joyal, Francine; Ford, Kim; Pelz, Susan  
**Subject:** Sampling and analysis plan - Sarasota County Food Waste Recycling project

Dear associates,

Attached is the finalized version of the sampling plan for the composting facility located at the Sarasota County Central Solid Waste Disposal Complex. Please print it out and save a copy for your records. If I receive no further commentary from you about this plan then I will consider it satisfactory and begin implementation. Thank you all for your time and consideration. -Cory

Cory Jamieson  
Environmental Specialist  
Resource Management Group  
1143 Central Avenue  
Sarasota, FL 34236  
941 358-7730  
Fax: 941 362-4290

**Ford, Kim**

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**From:** Cory Jamieson [cory@rmg.us]  
**Sent:** Monday, May 19, 2003 6:48 PM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** sampling plan - sarasota food waste recycling project

Dear associates,

We are quickly approaching the start date for our food waste collection and the beginnings of our sampling regimen. I have not received any further feedback on the appropriateness of the draft plan distributed April 15th. I will make the changes and additions as included in my draft comments and submit the this as a final version of our plan that will be implemented upon project commencement next week. Please contact me with any comments or questions. Thank you all for your help. -Cory

Cory Jamieson  
Environmental Specialist  
Resource Management Group  
1143 Central Avenue  
Sarasota, FL 34236  
941 358-7730  
Fax: 941 362-4290

**Ford, Kim**

---

**From:** Cory Jamieson [cory@rmg.us]  
**Sent:** Monday, April 28, 2003 10:13 AM  
**To:** Ford, Kim; Pelz, Susan  
**Subject:** Sampling Plan comments for revision

Kim and Susan,

I have not received any reply or comments from you in regards to the sampling plan documents sent to you on April 15th. I understand that you have been very busy but we are planning on receiving waste at the facility on May 26th and need an approved sampling regimen in place prior to this date. Any feedback you could give at this point would be greatly appreciated.

Tallahassee has given feedback on some of the parameters but has deferred to your office for DQO's and similar information. Thank you very much for your input. -Cory

Cory Jamieson  
Environmental Specialist  
Resource Management Group  
1143 Central Avenue  
Sarasota, FL 34236  
941 358-7730  
Fax: 941 362-4290

**Ford, Kim**

---

**From:** Cory Jamieson [cory@rmg.us]  
**Sent:** Friday, April 25, 2003 6:02 PM  
**To:** Monica Ozoires-Hampton  
**Cc:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** Feedstock Sampling

Monica,

Would the standard analysis (#101) provided by Wood's End be sufficient to characterize the waste for recipe formulation? We would like to use ELAB for metals and coliforms so that we can provide this information to DEP if need be.

In general, after speaking with you and DEP, I've decided on the following in regards to the sampling and analysis done over the course of the project, and the feedstock presently:

Any parameters that give valuable information for recipe formulation (outside those that may be of regulatory concern) or product marketing considerations, will be done by Wood's End.

Any parameters that may ultimately be analyzed at any point in the composting process (in leachate, final product, etc.) that could be used for regulatory considerations, will be analyzed by a NELAP certified laboratory, ELAB is the lab the County uses currently.

We would like to be able to present as large a body of usable data as possible to DEP. For example, if we found fecal coliforms in the compost during the process (from data supplied by ELAB), and had data provided by Wood's End that showed that it could have come from a mulch windrow exposed to bird droppings, we could not present this as a valid explanation of the data to DEP, and the whole project could be jeopardized. Of course, if either lab ever supplied data that showed an analyte of concern was present at a regulatory threshold we would avoid the source, but we'd also like to have the ability to give definitive negatives on analytes of concern for all our sources.

Therefore we want to cover our bases as much as possible without spending money from a limited budget on data that could turn out to be for our information only. Of course we want to use Wood's End as much as possible to make sure we get as good a product as we can out of this, and we'd like to be able to use them for more, but the DEP rules dictate how we approach the data collection process. Let me know if this seems reasonable to you and how it might affect presentation of project findings to the composting community. Thanks Monica. -Cory

Cory Jamieson  
Environmental Specialist  
Resource Management Group  
1143 Central Avenue  
Sarasota, FL 34236  
941 358-7730  
Fax: 941 362-4290



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

CERTIFIED MAIL 7001 1940 0001 7487 9276  
RETURN RECEIPT REQUESTED

April 15, 2003

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 knights Trail Road  
Nokomis, FL 34275

## NOTICE OF PERMIT

Dear Mr. Bennett:

Enclosed is Permit Number 200819-001-SO, issued pursuant to Section(s) 403.087(1), Florida Statutes.

Any party to the Order (permit) 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 Boulevard, Mail Station 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.

Executed in Tampa Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Kim B. Ford, P.E.  
Solid Waste Section  
Division of Waste Management

KBF/ab  
Attachment

cc: Paul Wingler, P.E., Sarasota County  
Jesse White, Resource Management Group  
Susan Pelz, P.E., FDEP Tampa (permit notebook)  
Richard Tedder, P.E., FDEP Tallahassee  
Francine Joyal, FDEP Tallahassee  
Fred Wick, FDEP Tallahassee

"More Protection, Less Process"

Printed on recycled paper.

Mr. Gary Bennett  
Permit No.: 200819-001-SO

Page Two

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on April 15, 2003 to the listed persons.

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

Anna Black  
Clerk

04/15/2003  
Date

**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.

**GENERAL CONDITIONS:**

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;
- (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.



**GENERAL CONDITIONS:**

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.

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.

PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

**GENERAL CONDITIONS:**

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 yard trash mulch and food waste composting facility and shall be operated in accordance with all applicable requirements of Chapters 62-4, 62-330, 62-522, 62-550, 62-701 and 62-709 Florida Administrative Code (F.A.C.) and all applicable requirements of Department Rules. This permit does not relieve the permittee's responsibility to comply with all applicable state, federal and local regulations which may govern this operation.
2. **Permit Application Documentation.** This permit authorizes the operation of the temporary composting facility in accordance with the reports, plans and other information as follows:
  - a. Application to Operate the Food Composting Facility, with related documents, received June 17, 2002;
  - b. Response letter by Sarasota County dated January 13, 2003 received on January 17, 2003;
  - c. Supplemental response letter and drawings (including the Yard Plan - Page No. 3) by Sarasota County dated February 4, 2003, received on February 5, 2003;and in accordance with all applicable requirements of Department rules.
3. **Permit Modifications.** Any activities 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 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 **ninety (90) 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 (if necessary to continue operation beyond the expiration date), in order to assure conformance with all applicable Department rules.
5. **Prohibitions.** The prohibitions of Rule 62-701.300, F.A.C., shall not be violated.
6. **Facility Operation Requirements.**
  - a. The permittee shall operate this facility in accordance with the information referenced in Specific Condition #2, above, and applicable Department rules.

**SPECIFIC CONDITIONS:**

- b. The facility site shall be constructed and operated to prevent ponding of water.
  - c. Measures shall be taken to avoid mixing unprocessed materials with finished compost.
  - d. Adequate equipment and reserve equipment shall be available for managing the material. In the event that equipment becomes inoperable, reserve equipment shall be operating at the site **within 24 hours** of equipment breakdown.
  - e. Litter shall be collected daily on operating days.
  - f. The facility shall have an all-weather access road, and shall maintain adequate access to the receiving, processing and storage areas at all times.
7. **Operation Plan and Operating Record.**
- a. Each facility owner or operator shall have an operational plan. 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 inspections.
  - b. **Annually, no later than June 1st each year**, the permittee shall either submit an updated Operations Plan which includes any revisions or modifications to the facility design or operations, or in the event that no changes have occurred, the permittee shall notify the Department that the facility design and operations have not changed from the permitted activity.
8. **Control of Access.** Access to, and use of, the facility shall be controlled as required by Rule 62-709.500(4)(b), F.A.C.
9. **Monitoring of Waste.**
- a. This permit authorizes the acceptance, processing and management of yard trash mulch and food waste only (including biodegradable materials associated with food waste).
  - b. Wastes shall be monitored as required by Rule 62-709.500(5)(c), F.A.C. Sufficient operating personnel shall be at the facility at all times when waste is received or processed. Incoming wastes shall be inspected for unacceptable wastes immediately after being received. Unacceptable wastes shall be removed immediately from incoming loads.
  - c. The permittee, owner or operator shall not accept mulch from painted or treated (e.g. pentachlorophenol, creosote, or CCA treated) wood for processing or storage at this facility.

**SPECIFIC CONDITIONS:**

**12. Sampling and Quality Assurance.**

a. Sampling and analysis of the finished compost shall be in accordance with Rule 62-709.530(1)(a) and (c), F.A.C.

b. Leachate Sampling and Analysis. In the event that the permittee wishes to demonstrate that the leachate produced by the facility operation meets Department water quality standards, then the leachate must be sampled and analyzed for the following parameters:

Water quality parameters listed in 62-701.510(8)(a) and (b), and chlorinated and nitrogen/phosphorus pesticide scan.

1) The demonstration must include a statistically significant number of samples equally distributed throughout the demonstration period.

2) Method Detection Limits must be less than or equal to the Maximum Contaminant Levels established for the individual parameters.

3) All field work done in connection with the facility's Sampling and Analysis Plan shall follow all applicable procedures described in DEP SOP-001/01 (January 2002). All laboratory analyses done in connection with the facility's Sampling and Analysis Plan shall be conducted by firms that are certified by the Department of Health Environmental Laboratory Certification Program in accordance with the schedule referenced in Chapter 62-160, F.A.C. The SOPs utilized and the laboratory's list of certified test methods and analytes must be specifically address the types of sampling and analytical work that are required by the permit and shall be implemented by all persons performing sample collection or analysis related to this permit.

4) The field testing, sample collection, sample preservation and laboratory testing, including the collection of quality control samples, shall be in accordance with the requirements of and methods approved by the Department in accordance with Rule 62-4.246 and Chapter 62-160, F.A.C. Approved methods published by the Department, or as published in Standard Methods or by A.S.T.M., or EPA methods shall be used. Alternate field procedures and laboratory methods may be used if they have been approved according to the requirements of Rule 62-160.220 and 62-160.330, F.A.C.

c. The Department may decrease or increase the parameters to be analyzed for or the frequency of analysis based on monitoring data, changes in the waste stream or processing, or the potential presence of toxic substances.

d. Annually by June 1<sup>st</sup>, and upon completion of the project, a project report shall be provided with all compost and leachate analytical data, with conclusions and recommendations, signed and sealed by a professional engineer.

**SPECIFIC CONDITIONS:**

13. **Recordkeeping.** Records shall be maintained as required by Rule 62-709.530, F.A.C.
- a. **Annually, no later than June 1st each year,** the owner or operator shall submit an annual report to the Department in accordance with Rule 62-709.530(3), F.A.C.
- b. The permittee shall record and maintain for three years the information required by Rule 62-709.530(2), F.A.C. The permittee shall compile this information monthly, and shall submit a summary **quarterly, by March 1st, June 1st, September 1st and December 1st each year.** Records shall be available for inspection by Department personnel during normal business hours and shall be sent to the Department upon request.
14. **Stormwater System Management.** Stormwater shall be managed to meet applicable standards of Chapters 62-3, 62-302, and 62-330, F.A.C. The facility shall have a surface water management system operated and maintained to prevent surface water flow onto composting areas, and a stormwater runoff control system operated and maintained to collect and control stormwater to meet requirements of Florida Administrative Code 62-330 and requirements of the respective water management district.
15. **Waste Burning.** Open burning of solid waste is prohibited except in accordance with Rules 62-701.300(3) and 62-256, F.A.C. Controlled burning of solid waste is prohibited at this site except for clean vegetative and wood wastes which may be burned in a permitted air curtain incinerator in accordance with Rule 62-296.401, F.A.C. Any accidental fires which require longer than **one (1) hour** to extinguish must be promptly reported to the Department.
16. **Fire Safety Survey.**
- 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 1st** 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.

**SPECIFIC CONDITIONS:**

**17. Control of Nuisance Conditions.**

a. The operating authority shall be responsible for the control of odors and fugitive particulates 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 mosquitoes and rodents or request such control measures from the local mosquito control office, as so to protect the public health and welfare.

b. Odor Control. The owner or operator shall inspect the facility boundaries at least **daily** for the presence of odor. In the event that odors are detected, the owner or operator shall **immediately (within 24 hours)** implement corrective actions to abate the odor. If the corrective measures do not sufficiently control the odor, the Department shall be notified in accordance with Specific Condition #18, and a plan for additional corrective measures shall be submitted. In the event that odor complaints are received from adjacent property owners/operators, the facility shall cease accepting material until the odors have been adequately controlled.

**18. Facility Maintenance and Repair.** The site shall be properly maintained including grading, prevention of ponding, and maintenance of composting subgrades and equipment. In the event of damage to any portion of the site facilities, failure of any portion of the facility systems, or in the event of a fire, the permittee shall **immediately (within 24 hours)** notify the Department of Environmental Protection explaining such occurrence, method to prevent reoccurrence, and remedial measures to be taken and time needed for repairs. Written detailed notification shall be submitted to the Department **within seven (7) days** following the occurrence.

**19. 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.

**20. 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.

**21. 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.

PERMITTEE: Sarasota County  
Mr. Gary Bennett

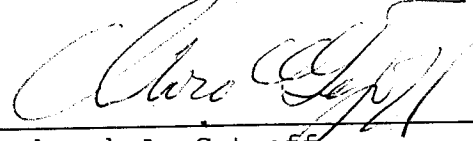
PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

**SPECIFIC CONDITIONS:**

22. **Regulations.** The requirements of Chapter 62-709, F.A.C., effective October 22, 2000, are incorporated into this permit by reference. In the event that the regulations governing this permitted operation are revised, the Department shall notify the permittee, and the permittee shall request modification of those specific conditions which are affected by the revision of regulations to incorporate those revisions.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



Deborah A. Getzoff  
Director of District Management  
Southwest District



PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

ATTACHMENT 1

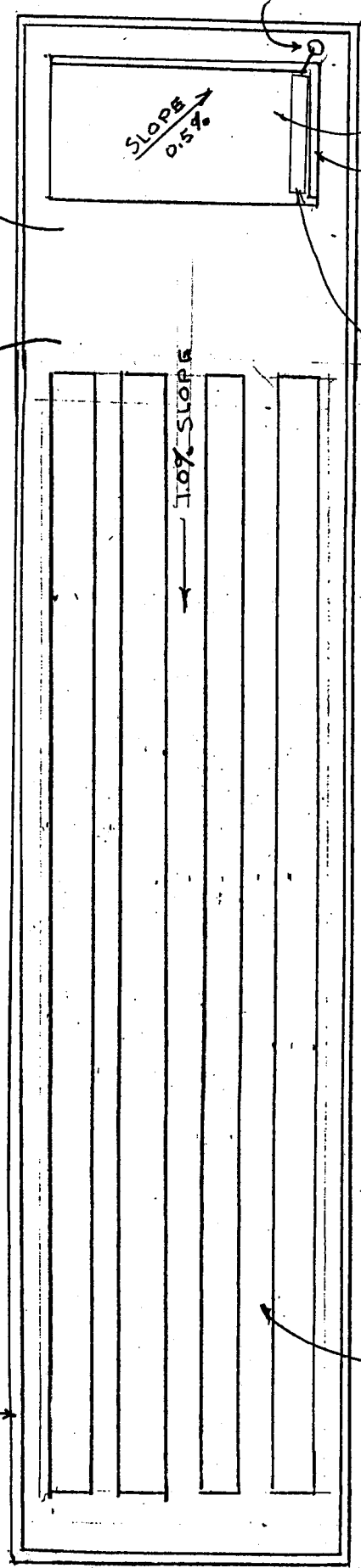
SPECIFIC CONDITION	SUBMITTAL DUE DATE	REQUIRED ITEM
4.	180 days prior to permit expiration	Permit Renewal Application or extend the expiration date
7.b.	Annually, by June 1st	Submit updated Operations Plan
12.d.	Annually, by June 1st	Submit Project Report
13.a.	Annually, by June 1st	Submit Annual Report
13.b.	Quarterly, by March 1st, June 1st, September 1st, and December 1st	Waste quantity reports, compost production report, compost analysis
18.	Within 24 hours of occurrence	Notify FDEP of system failure
18.	Within 7 days of occurrence	Written notification of system failure, and schedule for repair

N  
1" = 30'

ACCESS RAMP

EARTH BERM

275'



AG BAG AREA

(4) BAGS 5' DIA (4' X 7' +/-)

24" X 24" PUSH STOP

25' X 50' CONC RECEIVING PAD  
9" SAMPLE COLLECTION CURB

SAMPLE BUCKET

SLOPE 0.5%

10% SLOPE

25' X 50' X 6" CONC PAD  
ON 8" NO 57 CONC

6" MULCH FILL

TRENCH DRAIN  
3' X 3' X 50' NO 37  
CONC. W/ GEO COVER

18" INTERMEDIATE COVER

TRENCH DRAIN (TYP)

PROFILE (N.T.S.)

YARD PLAN

FOOD COMPOSTING FACILITY

DEC 2002 D. PAWINGLER, P.E.  
REV 2-8-03

PAGE NO. 3

PAWINGLER  
1/4/03

### Events Scheduled

Site # 0200819  
 Permit # 0200819-001-SO  
 Project # 001

Site Name FOOD COMPOSTING FACILITY  
 Type/Subtype SO / 21  
 Received 06/17/2002  
 Project Name FOOD COMPOSTING FACILITY

> ISSUE PERMIT: Issued

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Fee Verification	06/17/2002	2	06/19/2002		Sufficient Fee	06/19/2002
Completeness Review	06/17/2002	30	07/17/2002		Incomplete	07/16/2002
RESET CLOCK	07/16/2002	1	07/17/2002		Done	07/16/2002
Awaiting Additional Information	07/16/2002	45	08/30/2002		Received	01/17/2003
Completeness Review	01/17/2003	30	02/16/2003		Complete	01/17/2003
Determine Agency Action	01/17/2003	90	04/17/2003		Issue	03/21/2003
Mail Public Notice of Intent to Applicant an	03/21/2003	10	03/31/2003		Done	03/21/2003
Date of Publication	03/21/2003	999	12/14/2005		Published	03/26/2003
Issue Final Permit	03/26/2003	14	04/09/2003		Issued	04/15/2003
STOP CLOCK	04/15/2003	1	04/16/2003		Done	04/15/2003
ISSUE PERMIT	04/15/2003	1	04/16/2003		Issued	04/15/2003

Permitting Application - Permit Detail and L ermit

### SITE Permit

Site Name **FOOD COMPOSTING FACILITY** Site # **0200819**

County **SARASOTA** Comments ☒ RPAs ☒ # Cases ☐

#### Project

Permit # **0200819** - **001** - **SO** Project # **001** Received **06/17/2002** CRA # **124065**

Permit Office **SWD (DISTRICT)** Agency Action **Issued**

Project Name **FOOD COMPOSTING FACILITY** Desc  COE #

Type/Sub/Des **SO** / **21** **SOL WASTE R & D** OGC ☐

Logged **06/21/2002** Issued **04/15/2003** Expires **04/15/2004** Dele  Override **NONE**

Fee **1000.00** Fee Recd **1000.00**

#### Related Party

Role **APPLICANT** Begin **06/21/2002** End

Name **SOSADEETER, MIKE** Company **RESOURCE MANAGEMENT GROUP, INC.**

Address **200 S. WASHINGTON BLVD.** State **FL** Zip **34236** Country **U.S.A.**

City **SARASOTA** Phone **941-358-7730** Fax

#### Processors

Processor **FORD\_K** ☒ Active **06/21/2002** Inactive  **Events**

ord, Kim

**From:** cory jamieson [cory@rmg.us]  
**Sent:** Tuesday, April 15, 2003 5:01 PM  
**To:** Joyal, Francine; Ford, Kim; Pelz, Susan; White, Jesse; Nutter, Jean  
**Subject:** Draft of Sampling Plan

Dear associates,

Attached is the start of the sampling plan and its associated documents. I'm distributing this as a basis for comment and revision. I think it clearly outlines where this project is trying to go and what specific procedures will be followed. I've included with the draft some notes of my own on the status of the document as well as some specific questions that should be addressed prior to the plan's final submittal to the Department.

Thank you all for agreeing to work with me on this plan and attempting to expedite this process as much as possible. I want to make sure that we are going in the right direction with this and I look forward to the comments you have. -Cory

Note: Figure 1, referred to in the document, is a 4MB file and I did not include it in this email. It is essentially a modified version of the yard plan that is included in the permit and adds little information for the purposes of the plan at the moment. Let me know if you'd like a copy anyway.

Cory Jamieson  
Resource Management Group  
143 Central Ave.  
Tallahassee, FL 32306  
Phone: (904) 358-7730  
Fax: (904) 362-4290

### Notes on the Draft

- Table 1 incomplete. Awaiting information from ELAB in order to complete the tables. Specifically Table 1's RTs MDLs and PQLs need to be added. Table 2 is complete.
- A projected schedule will be attached in section 1.1.2
- An updated contact list will be added including laboratory contacts and quality assurance officers
- An equipment list or reference will be added for collection and test procedures.

### Specific Input Needed

- 1) Clear definitions of what DEP's DQO's are.
- 2) What are the acceptable ranges for accuracy, precision, and completeness for this project?
- 3) Will the data generated by this project be held in any data banks or repositories?
- 4) If the above information is added, will this sampling plan be sufficient to provide quality data to DEP. If not what more needs to be done?
- 5) Is any of this information superfluous?

**Sampling and Analysis Plan**  
**Food Waste Recovery and Recycling Project**  
**Grant IG1-14**

Submitted to the Florida Department of Environmental Protection on April 15, 2003, by  
Sarasota County

Prepared by Resource Management Group, Inc.

**DRAFT**

## **1.1 Introduction**

### **1.1.1 Project Description:**

Sarasota County, under a State of Florida Department of Environmental Protection Innovative Recycling Grant, was to conduct a three-tiered food reuse and recycling project in cooperation with local organizations. The production of compost made from organic solid waste (food residuals and food soiled paper products) was a primary component of this program.

The concept of a sampling plan that goes beyond compliance is an outgrowth of Sarasota County's desire to commercialize composting of food discards mixed with yard trimmings. During the County's attempt to site a composting facility on a farm and, later, an unlined section of the Central County Solid Waste Disposal Complex, barriers were encountered to facility permitting.

The project is moving forward as a pilot program. The primary purpose of this pilot is to collect data about the environmental impacts, particularly on water quality, that a composting facility produces. Does a food waste composting facility adversely affect water quality, and is the final product safe for commercial distribution?

Sarasota's experience is that the current standards for construction and operation of a composting facility make cost too high to encourage this type of waste reduction. If sampling can demonstrate that environmental risks are minimized, it is hoped that FDEP and the legislature will consider regulatory changes or exemptions for compost facilities that adhere to certain best management practices.

### **1.1.2 Project Scope and Purpose:**

The purpose of this project is to collect data on the physical and chemical properties of source-separated organic waste, storm and yard debris, the compost produced from their decomposition, and the leachate produced during the processing of these wastes into marketable compost.

The sampling and analysis of leachate, waste, and compost will take place over a period of approximately four months beginning in June of 2003, during all phases of the composting process. Attached is a projected schedule for this project.

### **1.1.3 Project Organization:**

## **1.2 Data Quality Objectives (DQO)**

### **1.2.1 Data Use:**

The data produced by this project will be provided to the Florida Department of Environmental Protection for the purpose of assessing the environmental impacts of composting. The department will make decisions



concerning the applicability of current regulations to the composting methods utilized during this project, and to compost facilities in general.

Specifically the permitting requirements of future facilities using the practices demonstrated in this project will be considered. If the data warrants rule modifications or special exemptions then the Department will act according to internal procedures for decision-making, data review, and rule changes.

### **1.2.2 Data Quality:**

The data provided to the Department will give assurances that the analytes of interest either do or do not exist in a given matrix at the applicable regulatory threshold. This data quality will be pursued for both compliance monitoring and data gathering objectives.

If no regulatory threshold exists for a parameter then the preferred method's MDL will be appropriate for characterizing the parameter's presence. Specifically the data will be presented and compared to a regulatory threshold, if applicable, with a two-tailed t-test at 80% confidence as recommended in SW 846 chapter nine.

Quality assurance actions will be taken to guarantee data quality. All pertinent quality control measures will be adhered to and applicable quality control programs will be complied with. These items include laboratory and field quality control samples, adherence to Department standard operating procedures and laboratory certification. These items are referenced specifically in section 1.3.1.

#### **1.2.2.1 Parameters**

The specific parameters fall into two categories: those parameters required by permit for regulatory compliance and those that provide useful information on the environmental impacts of the processes used or quality of final product. Those that are monitored for permit compliance are listed in 62-709.530 (1)(a) and (c) and apply to the finished compost product. Those parameters listed in 62-709.530 (1)(c) are not expected to be present in the finished compost at levels near their respective regulatory thresholds.

Parameters that will characterize the environmental impact of the process will show that the compost does not contain chlorinated or organo-phosphorous pesticides. These pesticides are not expected to be detected in the finished product.

Leachate from the facility will be analyzed for its effect on water quality. Therefore it will be tested for those parameters outlined in 62-701.510 (8) (a) and (b), as well as chlorinated and organo-phosphorous pesticides. No toxic organics are expected to be detected. Some nutrients are expected at dilute concentrations.

The waste will be analyzed for organic matter as required by permit in 62-709.530 (1)(g), chlorinated and organophosphorous pesticides and nutrient information for product and process evaluation. No pesticides are expected to be found in the waste.

All individual parameters are outlined in Appendix A, Table 1.

#### 1.2.2.2 Regulatory Thresholds

Leachate parameter levels will be compared with their corresponding maximum contamination levels allowable for Class I surface waters as found in table 62-302.530 FAC and for cleanup target levels as outlined in chapter 62-777 FAC for chlorinated and organophosphorous pesticides in surface water.

Compost data for 62-709.530 (1)(c) parameters will be compared with those levels defined for code 1 classification as outlined in chapter 62-709.550 (1) (e) and pesticides for 62-777 soil remediation target levels.

All individual parameter thresholds, if applicable, are listed in Appendix A, Table 1.

### 1.2.3 Analytical Methods

The laboratory methods used for this project were selected based on their ability to test for the analyte of concern in the applicable matrices at a level of precision consistent with the thresholds for that analyte and applicable rule or Department recommendations. These methods, with their respective MDLs and PQLs, are summarized in Appendix A, Table 1.

A Synthetic Precipitation Leaching Procedure (SPLP), Solid Waste method 1312 will be used in addition to those methods outlined in Table 1. This method will be used to characterize the waste's leaching properties and compare it to field collected leachate samples. This method will be performed on both solid waste received (Site B on Figure 1) and the finished compost (Site C on Figure 1). The individual parameters are outlined in the method.

## 1.3 Data Quality Indicators

### 1.3.1 Quality Control Measures

ELAB, Inc. will be the primary laboratory used for processing samples produced by this project and the only laboratory used for those parameters outlined in this sampling plan. ELAB is NELAC certified for all parameters and methods outlined herein. Certification information is available upon request. ELAB currently processes samples produced by Sarasota County's solid waste disposal facility.

FDEP SOP 001/01 will be followed for all sampling procedures. All appropriate Documentation will be filed (see section 1.5). Field quality control samples will be taken at a rate of 5% per reported analytical result and will include equipment blanks and duplicates. The laboratory will provide its own internal quality control blanks, including trip blanks for volatile organics. Any data that fails a quality control test will be reported to DEP but rejected and ignored for the purposes of this project's objectives.

## **1.4 Field Activities**

### **1.4.1 Sampling Design**

This sampling plan is designed to provide a representative body of data about composting and its by-products. Because little preliminary data exists for this project, more samples will be collected than are estimated as necessary to adequately characterize the process. Samples will be taken from 3 sites at the facility as illustrated in Figure 1 –Sampling Sites.

#### **1.4.1.1 Leachate**

Leachate will be sampled from site A, the leachate bucket. This is where the vast majority of leachate from the facility will collect, and all the leachate from the receiving and mixing process will collect.

Samples will be taken during every instance that leachate appears in the collection bucket until the data collected is believed to provide sufficient information as to the appropriate number and frequency of future sampling. All Leachate sampling and analysis is for data collection only and is not related to permit compliance.

#### **1.4.1.2 Waste**

Waste will be sampled at site B, the receiving pad. The nature of the project is such that the waste will be fairly heterogeneous upon receipt and its potential to contain unwanted material is relatively high. Therefore, for the purposes of data quality, generator characterization, and management concerns, the waste will be sampled every day waste is received for the first 10 days the facility receives waste, and then on an as needed basis thereafter determined by the results and data quality indicators. Waste sampling, outside of testing for organic matter content, is for data collection only and is not related to permit compliance.

#### **1.4.1.3 Compost**

Compost will be sampled at site C, the Ag-Bag area. A three-part composite will be sufficient to characterize the compost as recommended in 62-709.530 (1)(e). Some of the Compost sampling is permit compliance required while the remainder is for data collection purposes, these groups are delineated in Appendix A, Table 2

### **1.4.2 Sampling Locations and Collection Methods**

#### **1.4.2.1 Locations**

Sampling locations are illustrated in Figure 1 and their respective sampling methods are outlined in this section and in the Appendices. Samples will be taken from four sites during the course of the project: the leachate collection bucket (Site A), which collects runoff from the receiving pad; the receiving pad itself (Site B), the Ag-Bag area

(Site C), and a mulch windrow offsite (Site D). All permit required compliance monitoring will take place in Site C.

#### 1.4.2.2 Collection methods

Collections will be taken using methods from the Florida Department of Environmental Protection Standard Operating Procedures and methods for sampling compost found in DEP form 62-160.900(3) (Revised 6-96) Quality Assurance Project Plan for Testing Compost

Leachate will be sampled from the collection bucket using the grab sample technique for surface waters outlined in DEP-SOP 001/01 FS2100. These procedures will be followed for all samples taken from the collection bucket at Site A. Sampling equipment and applicable preservatives will be supplied by the analytical laboratory (discussed in section 1.3) and will adhere to the standards set forth in Table FS 1000-4 of DEP-SOP 001/01, and outlined in Table 2.

Waste will be sampled on the receiving pad using the methods described in section 6.1 of the Quality Assurance Project Plan for Compost Made From Solid Waste, which is included in Appendix 2. Materials for sampling will be provided by the laboratory and will conform to DEP SOP 001/01 Tables FS 1000-3 and 1000-7 as outlined in Appendix A Table 2.

Compost will be sampled using procedures described in section 6.2 of the Quality Assurance Project Plan for Compost Made From Solid Waste, as included in Appendix 2. Materials and equipment will be supplied by the laboratory and will adhere to DEP SOP 001/01 Tables FS 1000-2 and 1000-6 and applicable procedures.

#### 1.4.3 Field Testing Activities

Field testing of materials and leachate will take place at the sampling locations illustrated in Figure 1. All field sampling is for data collection purposes and does not constitute permit compliance monitoring. Leachate at site A will be tested using the following SOPS for the field parameters below:

- Temperature – FT1400
- pH - FT1100
- Conductance – FT1200
- Turbidity – FT1600
- Dissolved Oxygen – FT1500

All instruments and associated equipment will conform to the above SOPs. These measurement will be taken at least during every sampling event for leachate.

Compost will be monitored for the following field parameters:

- Temperature – FT1400
- pH - FT1100

All instruments and associated equipment will conform to the above SOPs. Measurements for temperature will be taken at least daily. Measurements for pH will be taken at least every time there is a sampling event for compost.

## **1.5 Documentation**

All analytical data submitted to the Department will be accompanied by the applicable documentation. This documentation will conform to FDEP SOP 001/01 FD 1000.

All data reported by the laboratory will conform to NELAC standards for data presentation and reporting. Included with this documentation will be the appropriate chain of custody information.

All field data collected and reported will be recorded according to FDEP SOP 001/01 FT 1000 section 4.1 and 4.2.

Table 1 - Parameters and Methods

Parameter	CAS #	Method	RT (ug/L)	PQL (ug/L)	MDL (ug/L)
<b>Field Parameters</b>					
Colors/Sheens	na	observe			
Conductivity	na	FT 1200			
DO - Dissolved Oxygen	na	FT 1500			
pH	na	FT 1100			
Salinity	na	FT 1300			
Temperature	na	FT 1400			
Turbidity	na	FT 1600			
<b>Physical/Biological Characteristics</b>					
BOD5 - Biochemical Oxygen Demand		EPA 405.1			
Chlorophyll A					
COD - Chemical Oxygen Demand		EPA 410.1			
Fecal Coliform		SM9221CE			
TDS - Total Dissolved Solids		SM2540C			
Total Hardness		EPA 200.7			
Total Organic Carbon		SM5310B			
TSS - Total Suspended Solids		EPA 160.1			
<b>Inorganic Metallics</b>					
Antimony.	Total	SW6010			
Arsenic	Total	SW6010			
Barium	Total	SW6010			
Beryllium	Total	SW6010			
Cadmium	Total	SW6010			
Chromium	Total	SW6010			
Cobalt	Total	SW6010			
Copper	Total	SW6010			
Iron	Total	SW6010			
Lead	Total	SW6010			
Mercury	Total	SW7472			
Nickel	Total	SW6010			

Table 1 - Parameters and Methods

Parameter	CAS #	Method	RT (ug/L)	PQL (ug/L)	MDL (ug/L)
<b>Inorganic Metallics (cont.)</b>					
Selenium	Total	SW6010			
Silver	Total	SW6010			
Sodium	Total	SW6010			
Thallium	Total	SW6010			
Vanadium	Total	SW6010			
Zinc	Total	SW6010			
<b>Inorganic Nonmetallics</b>					
Ammonia -N		350.1			
Unionized Ammonia		calc.			
Chlorides		300			
Nitrates		SM4500F/EPA9056/300			
Phosphates	Total	365.1			
Nitrogen	Total				
<b>Volatile Organics</b>					
Acetone	67-64-1	SW8260B			
Acrylonitrile	107-13-1	SW8260B			
Benzene	71-43-2	SW8260B			
Bromochloromethane	74-97-5	SW8260B			
Bromodichloromethane	75-27-4	SW8260B			
Bromoform; Tribromomethane	75-25-2	SW8260B			
Carbon disulfide	75-15-0	SW8260B			
Carbon tetrachloride	56-23-5	SW8260B			
Chlorobenzene	108-90-7	SW8260B			
Chloroethane; Ethyl chloride	75-00-3	SW8260B			
Chloroform; Trichloromethane	67-66-3	SW8260B			
Dibromochloromethane; Chlorodibromomethane	124-48-1	SW8260B			
1,2-Dibromo-3-chloropropane; DBCP	96-12-8	SW8260B			
1,2-Dibromoethane; Ethylene dibromide; EDB	106-93-4	SW8260B			
o-Dichlorobenzene; 1,2-Dichlorobenzene	95-50-1	SW8260B			
p-Dichlorobenzene; 1,4-Dichlorobenzene	106-46-7	SW8260B			
trans-1,4-Dichloro-2-butene	110-57-6	SW8260B			
1,1-Dichloroethane; Ethylidene chloride	75-34-3	SW8260B			
1,2-Dichloroethane; Ethylene dichloride	107-06-2	SW8260B			
1,1-Dichloroethylene; 1,1-Dichloroethene	75-35-4	SW8260B			
cis-1,2-Dichloroethylene; cis-1,2-Dichloroethene	156-59-2	SW8260B			

Table 1 - Parameters and Methods

Parameter	CAS #	Method	RT (ug/L)	PQL (ug/L)	MDL (ug/L)
<b>Volatile Organics (cont.)</b>					
trans-1,2-Dichloroethylene; trans-1,2-Dichloroethane	156-60-5	SW8260B			
1,2-Dichloropropane; Propylene dichloride	78-87-5	SW8260B			
cis-1,3-Dichloropropene	10061-01-5	SW8260B			
trans-1,3-Dichloropropene	10061-02-6	SW8260B			
Ethylbenzene	100-41-4	SW8260B			
2-Hexanone; Methyl butyl ketone	591-78-6	SW8260B			
Methyl bromide; Bromomethane	74-83-9	SW8260B			
Methyl chloride; Chloromethane	74-87-3	SW8260B			
Methylene bromide; Dibromomethane	74-95-3	SW8260B			
Methylene chloride; Dichloromethane	75-09-2	SW8260B			
Methyl ethyl ketone; MEK; 2-Butanone	78-93-3	SW8260B			
Methyl iodide; Iodomethane	74-88-4	SW8260B			
4-Methyl-2-pentanone; Methyl isobutyl ketone	108-10-1	SW8260B			
Styrene	100-42-5	SW8260B			
1,1,1,2-Tetrachloroethane	630-20-6	SW8260B			
1,1,2,2-Tetrachloroethane	79-34-5	SW8260B			
Tetrachloroethylene; Tetrachloroethene	127-18-4	SW8260B			
Toluene	108-88-3	SW8260B			
1,1,1-Trichloroethane; Methylchloroform	71-55-6	SW8260B			
1,1,2-Trichloroethane	79-00-5	SW8260B			
Trichloroethylene; Trichloroethene	79-01-6	SW8260B			
Trichlorofluoromethane; CFC-11	75-69-4	SW8260B			
1,2,3-Trichloropropane	96-18-4	SW8260B			
Vinyl acetate	108-05-4	SW8260B			
Vinyl chloride	75-01-4	SW8260B			
Xylenes	1330-20-7	SW8260B			
<b>Chlorinated Pesticides</b>					
Aldrin	309-00-2	SW8081B			
••BHC	319-84-6	SW8081B			
••BHC	319-85-7	SW8081B			
••BHC (Lindane)	58-89-9	SW8081B			
••BHC	319-86-8	SW8081B			
Chlorobenzilate	510-15-6	SW8081B			
••Chlordane	5103-71-9	SW8081B			
••Chlordane	5103-74-2	SW8081B			



Table 1 - Parameters and Methods

Parameter	CAS #	Method	RT (ug/L)	PQL (ug/L)	MDL (ug/L)
<b>Chlorinated Pesticides (cont.)</b>					
Chlordane	57-74-9	SW8081B			
DBCP	96-12-8	SW8081B			
4,4'-DDD	72-54-8	SW8081B			
4,4'-DDE	72-55-9	SW8081B			
4,4'-DDT	50-29-3	SW8081B			
Diallate	2303-16-4	SW8081B			
Dieldrin	60-57-1	SW8081B			
Endosulfan I	959-98-8	SW8081B			
Endosulfan II	33213-65-9	SW8081B			
Endosulfan sulfate	1031-07-8	SW8081B			
Endrin	72-20-8	SW8081B			
Endrin aldehyde	7421-93-4	SW8081B			
Endrin ketone	53494-70-5	SW8081B			
Heptachlor	76-44-8	SW8081B			
Heptachlor epoxide	1024-57-3	SW8081B			
Hexachlorobenzene	118-74-1	SW8081B			
Hexachlorocyclopentadiene	77-47-4	SW8081B			
Isodrin	465-73-6	SW8081B			
Methoxychlor	72-43-5	SW8081B			
Mirex		SW8081B			
Strombane		SW8081B			
Toxaphene	8001-35-2	SW8081B			
Trifluralin (Treflan)		SW8081B			
<b>Organophosphorus Pesticides</b>					
Atrazine		SW8141A			
Azinphos-methyl	86-50-0	SW8141A			
Azinphos-ethyl	2642-71-9	SW8141A			
Bolstar(Sulprofos)	35400-43-2	SW8141A			
Carbophenothion	786-19-6	SW8141A			
Chlorfenvinphos	470-90-6	SW8141A			
Chlorpyrifos	2921-88-2	SW8141A			
Coumaphos	56-72-4	SW8141A			
Demeton-O	8065-48-3	SW8141A			
Demeton-S	8065-48-3	SW8141A			
Diazinon	333-41-5	SW8141A			

Table 1 - Parameters and Methods

Parameter	CAS #	Method	RT (ug/L)	PQL (ug/L)	MDL (ug/L)
<b>Organophosphorus Pesticides (cont.)</b>					
Dichlorofenthion	97-17-6	SW8141A			
Dichlorvos(DDVP)	62-73-7	SW8141A			
Dimethoate	60-51-5	SW8141A			
Dioxathion	78-34-2	SW8141A			
Disulfoton	298-04-4	SW8141A			
EPN	2104-64-5	SW8141A			
Ethion	563-12-2	SW8141A			
Ethoprop	13194-48-4	SW8141A			
Famphur	52-85-7	SW8141A			
Fensulfothion	115-90-2	SW8141A			
Fenthion	55-38-9	SW8141A			
Leptophos	21609-90-5	SW8141A			
Malathion	121-75-5	SW8141A			
Merphos	150-50-5	SW8141A			
Mevinphos	7786-34-7	SW8141A			
Monocrotophos	6923-22-4	SW8141A			
Naled	300-76-5	SW8141A			
Parathion, ethyl	56-38-2	SW8141A			
Parathion, methyl	298-00-0	SW8141A			
Phorate	298-02-2	SW8141A			
Phosmet	732-11-6	SW8141A			
Phosphamidon	13171-21-6	SW8141A			
Ronnel	299-84-3	SW8141A			
Stirophos(Tetrachlorovinphos)	22248-79-9	SW8141A			
Sulfotepp	3689-24-5	SW8141A			
TEPP	21646-99-1	SW8141A			
Terbufos	13071-79-9	SW8141A			
Thionazin(Zinophos)	297-97-2	SW8141A			
Tokuthion(Protothiofos)	34643-46-4	SW8141A			
Trichloronate	327-98-0	SW8141A			

QAPP # \_\_\_\_\_  
assigned by DEP

**QUALITY ASSURANCE PROJECT PLAN  
FOR TESTING COMPOST MADE FROM SOLID WASTE**

Prepared for: \_\_\_\_\_  
composting facility name

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Laboratory Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

**SIGNATURES**

We, the undersigned, have read this document in its entirety. It is understood that all sampling and analytical methodologies described herein will be adhered to for each sampling and analytical episode performed pursuant to Chapter 62-709, FAC, upon DEP approval of this Quality Assurance Plan. Additionally, all cited Quality Assurance procedures shall be adhered to by all involved parties. Deviations from this plan must be proposed in writing, and approved by the DEP Quality Assurance Officer, before they may be implemented.

Facility Owner/operator: \_\_\_\_\_  
type or print name below line:

Laboratory Project Manager: \_\_\_\_\_  
type or print name below line:

Laboratory QA Officer: \_\_\_\_\_  
type or print name below line:

**DEP APPROVAL**

DEP Quality Assurance Manager: \_\_\_\_\_  
type or print name below line:

## **2.0 INTRODUCTION**

Chapter 62-709 of the Florida Administrative Code requires that sampling and analysis of compost made from solid waste be performed according to a Department-approved Quality Assurance Plan. This requirement shall be fulfilled by completing and filing this Quality Assurance Plan for Testing Compost Made From Solid Waste with the local DEP District Office at an address listed below.

This document was compiled in accordance with Chapter 62-709, FAC, and the Department's Manual for Preparing Quality Assurance Plans, DEP-QA-001/90.

This Compost QA Plan requires that the designated analytical laboratory have an approved Comprehensive Quality Assurance Plan on file with the DEP Quality Assurance Office.

Upon approval, this Compost QA Plan shall be applicable to the testing of compost from the facility listed on the cover page. Sampling and analysis of compost may not begin until this QA Plan is approved by the DEP Quality Assurance Section.

Submit the completed QA Plan to the Division of Waste Management, Bureau of Solid Waste at the local DEP District office.

**NWD** - Pensacola District Office address:  
160 Governmental Center  
Pensacola, FL 32501  
(904) 444-8360

**NED** - Jacksonville District Office address:  
7825 Bay Meadows Way  
Suite 200B  
Jacksonville, FL 32256-7577  
(904) 448-4320

**SWD** - Tampa District Office address:  
3804 Coconut Palm Drive  
Tampa, FL 33619-8318  
(813) 744-6100

**CD** - Orlando District Office address:  
3319 Maguire Boulevard  
Suite 232  
Orlando, FL 32803  
(407) 894-7555

**SD** - Fort Myers District Office address:  
2295 Victoria Avenue  
Fort Myers, FL 33901  
(813) 332-6975

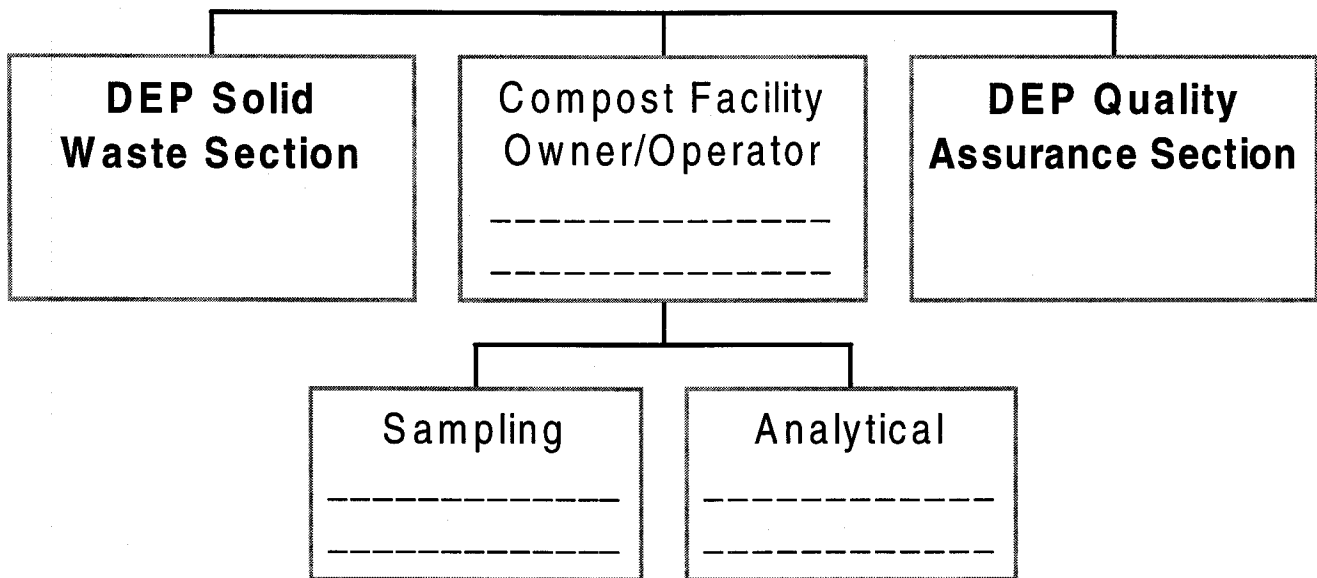
**SED** - West Palm Beach District Office address:  
400 North Congress Avenue  
West Palm Beach, FL 33401  
(561) 681-6729

### **3.0 TABLE OF CONTENTS**

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#### **4.0 PROJECT ORGANIZATION AND RESPONSIBILITY**

Fill in the chart below:



Sampling will be performed by: \_\_\_\_\_

Sampling Consultant Comprehensive QA Plan # (if applicable) \_\_\_\_\_

Last Updated: \_\_\_\_\_

Last Approved: \_\_\_\_\_

Analyses will be performed by: \_\_\_\_\_

Laboratory Comprehensive QA Plan # \_\_\_\_\_

Last Updated: \_\_\_\_\_

Last Approved: \_\_\_\_\_

**All sampling shall be performed in accordance with the procedures outlined in this Quality Assurance Project Plan. All analyses shall be performed using the methods specified in Section 5.4, and shall follow all procedures as approved in the laboratory Comprehensive Quality Assurance Plan.**

## 5.0 QUALITY ASSURANCE OBJECTIVES FOR PRECISION AND ACCURACY

Quality Assurance Objectives for the analyses specified below are listed in \_\_\_\_\_  
\_\_\_\_\_ Comprehensive QA Plan, Section \_\_\_\_\_,  
pages \_\_\_\_\_, dated \_\_\_\_\_.

### 5.1 Instructions

Identified on the next page are analytical categories based on requirements set forth in 62-709.530(1), FAC.

Check box (1) (next page) if compost is made from yard trash and/or manure only.

Check boxes (1) and (2) (next page) if compost is made from solid waste other than only yard trash and/or manure.

In the "Analytical" column, fill in the exact method number to be used by the laboratory per parameter. Equivalent EPA-approved methods may be used, if so indicated in the laboratory's referenced Comprehensive QAP. **Be sure to indicate the decimal or alphabetic suffix when identifying analytical methods.**

### 5.2 Calculations

**Foreign Matter** must be calculated according to the criteria specified in 62-709.530(1)(f), and 62-709.200(7), FAC.

**Organic Matter** must be calculated according to the criteria specified in 62-709.530(1)(g), FAC.

**Reduction in Organic Matter (ROM)** must be calculated according to the criteria specified in 62-709.530(1)(h), FAC.

**Fecal Coliform** must be calculated according to the results for Organic Matter, as determined above.

### 5.3 Analytical Frequencies

Analyses must be performed at the applicable frequencies as specified in 62-709.530(1)(a) and (c), FAC.

## **5.4 Analytical Methods**

### **I. [ ] COMPOST MADE FROM SOLID WASTE**

<u>Parameter</u>	<u>Method Equiv.</u>	<u>Analytical</u>
% Moisture	EPA 160.3	_____
Total Nitrogen <sup>DW</sup> TKN	EPA 351 <sup>A</sup>	_____
NO <sub>3</sub> -NO <sub>2</sub>	EPA 353 <sup>A</sup>	_____
Total Phosphorus <sup>DW</sup>	EPA 365 <sup>A</sup>	_____
Total Potassium <sup>DW</sup>	EPA 3050/7610 <sup>B</sup>	_____
Organic Matter <sup>DW</sup>	EPA 160.4	_____
Reduction in Organic Matter	calculation	_____ N/A
pH	EPA 9045	_____

### **II. [ ] ADDITIONAL PARAMETERS FOR COMPOST MADE FROM SOLID WASTE OTHER THAN ONLY YARD TRASH AND/OR MANURE**

<u>Parameter</u>	<u>Method Equiv.</u>	<u>Analytical</u>
Foreign Matter	[refer to 62-709.530(1) (f)]	_____
Cadmium <sup>DW</sup>	EPA 3050/7130 <sup>B</sup>	_____
Copper <sup>DW</sup>	EPA 3050/7210 <sup>B</sup>	_____
Lead <sup>DW</sup>	EPA 3050/7420 <sup>B</sup>	_____
Nickel <sup>DW</sup>	EPA 3050/7520 <sup>B</sup>	_____
Zinc <sup>DW</sup>	EPA 3050/7950 <sup>B</sup>	_____
Fecal Coliform <sup>DW</sup>	SM 908 (MPN) <sup>A</sup>	_____

<sup>A</sup> Modified Method -- if information does not appear in the referenced Quality Assurance Plan, the information must be submitted as an amendment to that plan. Sample prep methodologies are available from the DEP QA Section.

<sup>B</sup> Graphite furnace or ICP methods are also acceptable.

<sup>DW</sup> Report results as DRY WEIGHT.



## **6.0 SAMPLING PROCEDURES**

Samples shall be taken from both the incoming waste stream and the finished product. Section 6.1 describes sampling, compositing, handling, and analytical procedures for the incoming waste stream. Section 6.2 describes sampling, compositing and handling procedures for finished product.

### **6.1 Procedures for Incoming Waste**

A composite sample of the incoming waste stream (feedstock) shall be analyzed for determination of the initial Organic Matter value to be used in the calculation for Reduction of Organic Matter (% ROM).

#### **6.1.1 Sampling Frequency**

The incoming waste stream shall be sampled every two weeks, or for every 3,000 tons of finished product, whichever comes first (see NOTE in Section 6.1.3). This scheme will give a total of six sampling events within each analytical period required for finished compost.

In order to determine the amount of incoming waste which is equivalent to 3,000 tons of finished product, use the following formula:

$$\frac{333,000}{100 - x} = \text{tons incoming waste equivalent to 3,000 tons finished product}$$

**x** = total reduction in weight from incoming waste to finished product, in percent (%).

If the actual weight reduction factor is unknown, use 70% as the value for x, until the actual value can be determined.

#### **6.1.2 Sample Composition**

Samples shall be taken from incoming material that has been shredded or otherwise reduced in particle size.

From the material exiting the shredder, one sample shall be obtained every 2 hours, over an operational period of 8 hours, for a total of four (4) samples. Sample size should be approximately 1000 cc (approx. 1 qt.) per sample. The four samples shall then be thoroughly mixed together, and a portion of the mixture (composite sample) shall be sent to the laboratory for analysis. Refer to Section 7.0 of this plan for appropriate sample containers and holding times.

#### 6.1.2 Sample Compositing, cont'd.

If grab sampling directly from the shredder is not possible, then the incoming material shall be sampled no more than 24 hours after being passed through the shredding equipment. In this case, the sampling protocol specified in Section 6.2.1 shall be used.

#### 6.1.3 Determination of Initial Organic Matter Content

For each analytical period (every 3 months or every 20,000 tons of finished product), the incoming waste stream shall be sampled six times (every two weeks or every 3,000 tons of finished product), and analyzed for organic matter content. The results from those six analyses shall be averaged, and the average value shall be used as the value for "OM" in the formula for Reduction of Organic Matter (% ROM), as specified in 62-709.530(1)(h), FAC.

#### NOTE -- For facilities composting yard trash/manure ONLY:

If the incoming waste stream is shredded at intervals longer than two weeks, so that it is not possible to sample at exact two week intervals, samples shall be obtained whenever the incoming material is shredded. If no material is shredded during the required analytical period, then the most recent Organic Matter value determined for the incoming material shall be used in the Reduction of Organic Matter (% ROM) calculation. Four (4) samples shall be obtained according to the procedures specified in Section 6.1.2 above, for each of up to six (6) separate sampling events during the analytical period required for the finished compost. When reporting %ROM, include the dates of the actual sampling events.

#### 6.1.4 Analytical Procedures

Organic Matter content shall be determined by EPA Method 160.4 or equivalent, as specified in Section 5.4 of this QA Plan. The laboratory must further pulverize the sample to reduce particle size, then thoroughly mix the sample before analysis. Individual and average results must be reported as percent dry weight.

### 6.2 Procedures for Finished Product

Samples shall be taken from product that has completed the composting process since the last sampling event. Each compost pile or similar unit produced since the last sampling event shall be sampled according to procedures given below.

For each sampling event, a single composite sample shall be made up of subsamples from each pile and analyzed according to procedures outlined in Section 5.0 of this plan.

### 6.2.1 Sample Location

Samples shall be located according to the following protocol:

For each pile of finished compost, a minimum of three (3) points shall be selected around the perimeter of the pile. If possible, the locations should be at least 25 linear feet apart. At each selected Perimeter location, four (4) samples must be taken as follows:

- a. At a vertical level of approximately one foot above ground level, one sample shall be taken at a point approximately one foot horizontally into the pile. A second sample shall be taken at a point approximately four feet horizontally into the pile.
- b. Repeat the above procedure at a vertical level of four feet above ground level.

*See figure 6-1 below, for a diagram of sample location procedures.*

The above procedure will result in a minimum of twelve (12) grab samples per pile. Samples from each pile must be composited according to the procedure described in Section 6.3 below.

### 6.2.2 Sample Collection

Samples may be collected horizontally or vertically, as feasible. If samples are collected vertically, care must be taken to insure that the actual collected sample is representative of the intended depth.

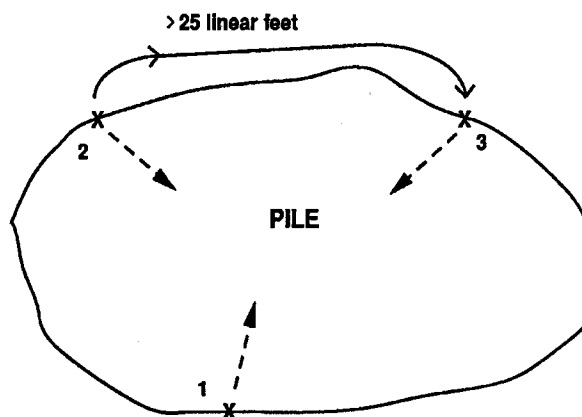
Appropriate sampling devices include thief samplers, triers, and coring devices. Hand augers may be used for vertical sampling, if the conditions of the pile are amenable to such techniques. If coring devices (such as PVC pipe, or similar plastic cylinders) are driven into the pile, care must be taken to prevent splintering of the device.

In order to maintain the integrity of samples during the collection and compositing process, all grab samples and intermediate composite samples shall be kept away from excessive heat or direct sunlight. The final composite sample shall be containerized immediately upon composition, and placed on wet ice for shipping. Refer to Section 7.0 for information regarding appropriate containers, shipping and handling procedures.

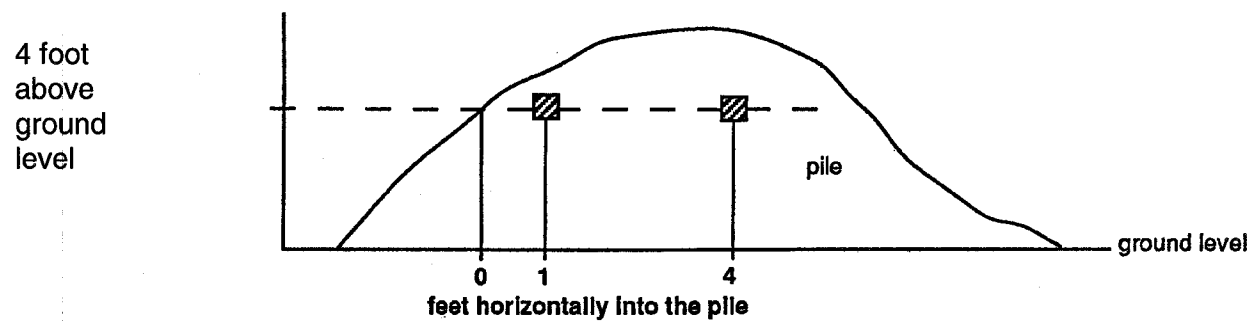
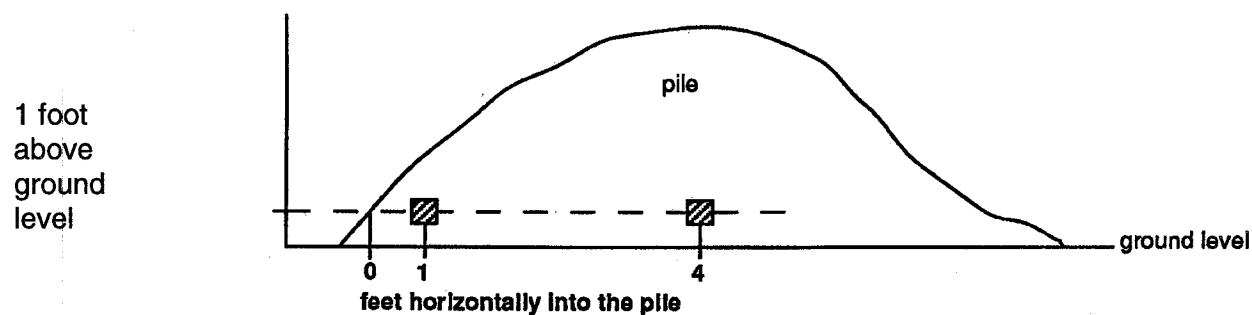
**Figure 6-1 Sample Location Diagram**

**A. Perimeter Sample Location Points**

At each numbered point "X",  
take four (4) grab samples  
as shown in "B" below (two  
samples at each height level).



**B. Horizontal Sampling Depths (Towards Center)**



### 6.2.3 Sample Compositing

Grab samples from each pile shall be composited into a single sample; a single composite sample shall then be composed from subsamples of the pile composites.

*Refer to Figure 6-2 for a diagram of compositing procedures.*

#### 6.2.3.1 Pile Composites

Grab samples shall be composited according to the following protocol: Approximately 250 cubic centimeters (250 cc; about 8 oz.) of compost material should be collected from each sampling point (grab sample). The material from all grab samples should be held in a suitable mixing vessel, approximately 3000-5000 cc (approx. 3-5 qt.) in volume (refer to Section 6.4 below for restrictions). When all grab samples from a specific pile have been collected, the contents of the vessel must be thoroughly mixed. A portion of the pile composite shall be transferred to a separate mixing vessel for the final composite (refer to Section 6.3.2 below). The volume of the subsample will be dependent on the number of piles to be sampled, and laboratory requirements, but must be no less than 500 cc, in order to insure minimum representativeness. For example, if the lab requires 1 500 cc for analysis, and there are two piles to be sampled, approximately 1000 cc should be taken from each pile composite. The two composites, totaling 2000 cc, are then mixed thoroughly, and the 1500 cc sample is taken from this final composite.

This procedure must be repeated for each individual compost pile.

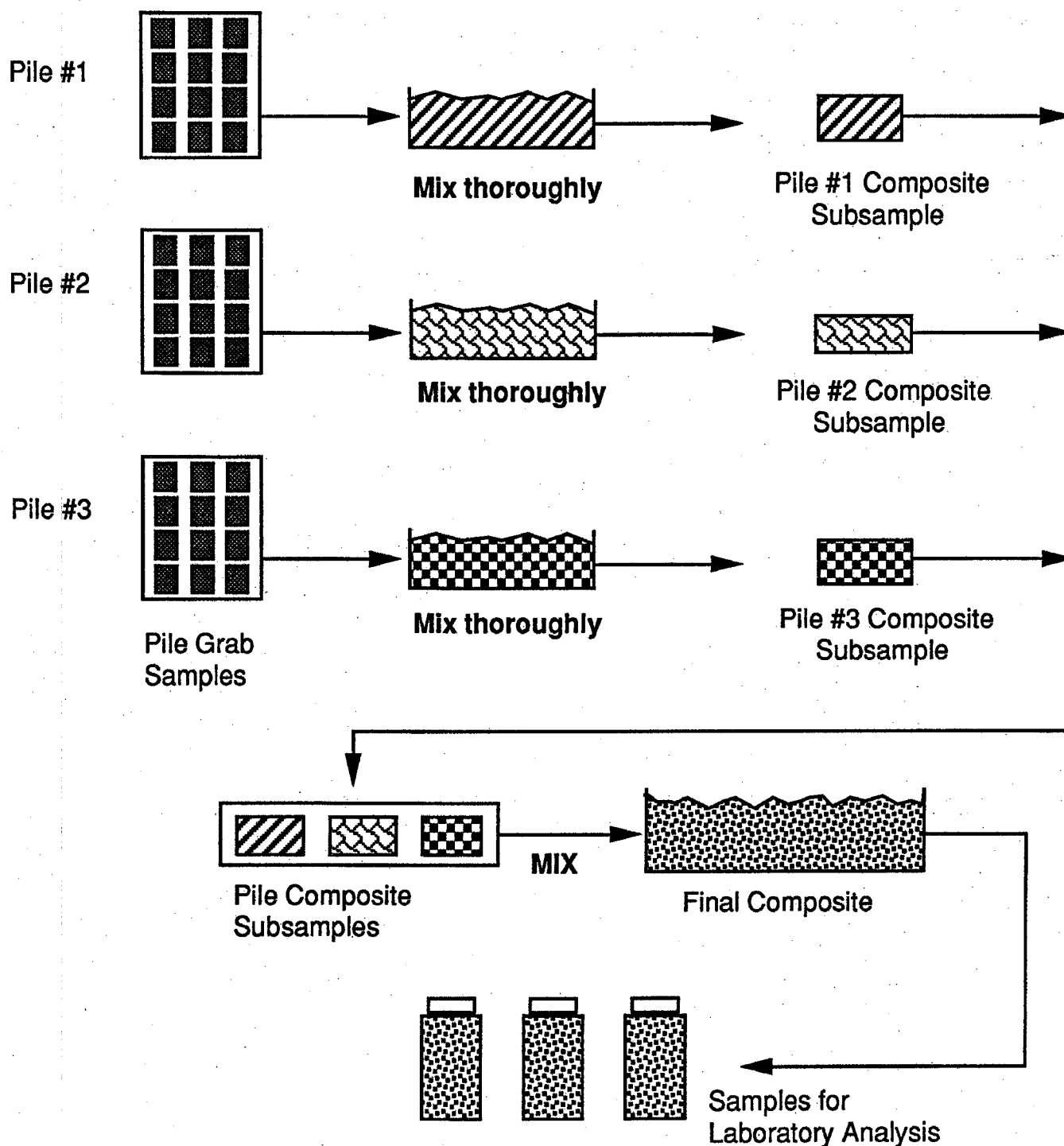
#### 6.2.3.2 Final Composite

The final composite sample shall be prepared as follows: Equal proportions of each pile composite sample should be transferred to the final mixing vessel as they are processed. When all pile composites have been processed and proportioned, the contents of the vessel must be thoroughly mixed. The final volume of the sample should be approximately 1000 cc, or as determined by the analyzing laboratory. Refer to Section 7.0 below for appropriate sample containers.

### 6.2.4 Sampling Equipment and Decontamination Procedures

Sampling equipment and procedures for cleaning are dependent upon the analytical category of the compost (as defined in Section 5.4 of this QA Plan).

**FIGURE 6-2 Sample Compositing Flow Diagram**



#### 6.2.4.1 Equipment

Sampling equipment, as specified in Section 6.2 above, may be constructed of plastic, including fluorocarbon resins (Teflon®) without restriction. Metallic sampling devices are also acceptable for Category I parameters, except painted or galvanized equipment.

For Category II compost (solid waste other than only yard trash/manure), metallic sampling devices shall be constructed of **stainless steel** only. Plastic devices are also acceptable for this category.

Mixing vessels and implements may be constructed of glass, plastic, or metal as described above. Note: stainless steel must be used if sampling Category II compost. A shallow bowl or tray is recommended for mixing composite samples.

#### 6.2.4.2 Decontamination Procedures

The procedure outlined below will be followed for all equipment used:

- 1) Scrub (bottle brush or equivalent) with a tap water solution of laboratory grade detergent (Liquinox® or equivalent). Detergent must be free of all phosphorus and nitrogen species (Alconox® and Micro®, or equivalents, are not appropriate).
- 2) Rinse thoroughly with deionized or distilled water.

Equipment should be decontaminated before each sampling event. Equipment decontamination is not necessary between sampling points in each pile, or between piles.

## **7.0 SAMPLE CUSTODY**

Sample containers may be provided by the laboratory or other appropriate source. Plastic containers are recommended, but glass is also acceptable. Container lids shall have plastic, or plastic-faced cardboard liners. Foil or other metallic liners are not acceptable. For fecal coliforms, sterilized glass or plastic containers are recommended, but unused "zip" closure bags or "Whirl-Pak" bags are also acceptable for use. All sample containers shall be new, or be clean and/or sterile before reuse. Fill all containers as completely as possible, label, and seal tightly before placing them in the shipping container. Sample labels must include date of sampling, sample identification number, and requested analyses.

After each sampling event, the final composite sample (to be analyzed) shall be placed on wet ice immediately, and delivered or shipped to the laboratory as soon as possible.

The following sample holding times (time from sample collection to analysis) shall not be exceeded:

**6 hours** for Fecal Coliform;

**7 days** for % Moisture, Organic Matter, pH;

**28 days** for Nitrogen, Phosphorus;

**6 months** for metals (Potassium, Cadmium, Copper, Lead, Nickel, Zinc)

Field records must be kept for each sampling event. The following information must be documented.

- ◆ Date of sampling event
- ◆ Site conditions/observations
- ◆ Sample collection device and construction
- ◆ Source of sample containers
- ◆ Sample identification numbers
- ◆ Name(s) of sampler(s)
- ◆ Description of all pile sampling points, with volume of each grab sample (point) taken; volume (proportion) of each pile composite subsampled; volume of final composite sample.



**Ford, Kim**

---

**From:** jesse white [jesse.white@rmg.us]  
**Sent:** Tuesday, April 15, 2003 8:54 AM  
**To:** Ford, Kim  
**Cc:** Cory Jamieson  
**Subject:** permit for sarasota composting facility

Dear Kim,

Did you mail us a copy of the permit? Please note our new address (below).

We will be updating the County's citizen advisory council tomorrow on the status of the project, can you please confirm that a permit has been issued? thanks.

Jesse

Jesse White  
President  
Resource Management Group, Inc.  
jesse@rmg.us

www.rmg.us

-----  
"RMG - Creating sustainable programs for business and government to manage solid waste efficiently through waste reduction, materials reuse, recycling, and compost production."

Resource Management Group, Inc.  
1143 Central Ave  
Sarasota, FL 34236  
941-358-7730  
\*NEW\* 941-362-4290 FAX  
-----



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

CERTIFIED MAIL 7001 1940 0001 7487 9276  
RETURN RECEIPT REQUESTED

April 15, 2003

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 knights Trail Road  
Nokomis, FL 34275

## NOTICE OF PERMIT

Dear Mr. Bennett:

Enclosed is Permit Number 200819-001-SO, issued pursuant to Section(s) 403.087(1), Florida Statutes.

Any party to the Order (permit) 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 Boulevard, Mail Station 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.

Executed in Tampa Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Kim B. Ford, P.E.  
Solid Waste Section  
Division of Waste Management

KBF/ab

Attachment

cc: Paul Wingler, P.E., Sarasota County  
Jesse White, Resource Management Group  
Susan Pelz, P.E., FDEP Tampa (permit notebook)  
Richard Tedder, P.E., FDEP Tallahassee  
Francine Joyal, FDEP Tallahassee  
Fred Wick, FDEP Tallahassee

"More Protection, Less Process"

Printed on recycled paper.

Mr. Gary Bennett  
Permit No.: 200819-001-SO

Page Two

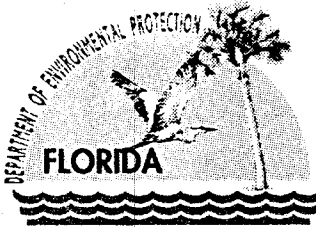
CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on April 15, 2003 to the listed persons.

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

Anna Blau  
Clerk

04/15/2003  
Date



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

## PERMITTEE

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 Knights Trail Road  
Nokomis, FL 34275

## PERMIT/CERTIFICATION

WACS Facility ID No: SWD/58/51614  
Permit No: 200819-001-SO  
Date of Issue: **04/15/2003**  
Expiration Date: **04/15/2004**  
County: Sarasota  
Lat/Long: 27° 12' 09"N  
82° 23' 15"W  
Sec/Town/Rge: 1-4, 9-16/38S/19E  
Project: Food Composting  
Facility Operation - CCSWDC

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-522, 62-550, 62-701, and 62-709. 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 composting facility (approximately 1/2 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida. The specific conditions attached are for the operation of a:

1. Food Composting Facility

**Replaces Permit No.: N/A, new**

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.

**GENERAL CONDITIONS:**

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;
- (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.

**GENERAL CONDITIONS:**

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.

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.

PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

**GENERAL CONDITIONS:**

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 yard trash mulch and food waste composting facility and shall be operated in accordance with all applicable requirements of Chapters 62-4, 62-330, 62-522, 62-550, 62-701 and 62-709 Florida Administrative Code (F.A.C.) and all applicable requirements of Department Rules. This permit does not relieve the permittee's responsibility to comply with all applicable state, federal and local regulations which may govern this operation.
2. **Permit Application Documentation.** This permit authorizes the operation of the temporary composting facility in accordance with the reports, plans and other information as follows:
  - a. Application to Operate the Food Composting Facility, with related documents, received June 17, 2002;
  - b. Response letter by Sarasota County dated January 13, 2003 received on January 17, 2003;
  - c. Supplemental response letter and drawings (including the Yard Plan - Page No. 3) by Sarasota County dated February 4, 2003, received on February 5, 2003;and in accordance with all applicable requirements of Department rules.
3. **Permit Modifications.** Any activities 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 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 **ninety (90) 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 (if necessary to continue operation beyond the expiration date), in order to assure conformance with all applicable Department rules.
5. **Prohibitions.** The prohibitions of Rule 62-701.300, F.A.C., shall not be violated.
6. **Facility Operation Requirements.**
  - a. The permittee shall operate this facility in accordance with the information referenced in Specific Condition #2, above, and applicable Department rules.

**SPECIFIC CONDITIONS:**

- b. The facility site shall be constructed and operated to prevent ponding of water.
  - c. Measures shall be taken to avoid mixing unprocessed materials with finished compost.
  - d. Adequate equipment and reserve equipment shall be available for managing the material. In the event that equipment becomes inoperable, reserve equipment shall be operating at the site **within 24 hours** of equipment breakdown.
  - e. Litter shall be collected daily on operating days.
  - f. The facility shall have an all-weather access road, and shall maintain adequate access to the receiving, processing and storage areas at all times.
7. **Operation Plan and Operating Record.**
- a. Each facility owner or operator shall have an operational plan. 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 inspections.
  - b. **Annually, no later than June 1st each year,** the permittee shall either submit an updated Operations Plan which includes any revisions or modifications to the facility design or operations, or in the event that no changes have occurred, the permittee shall notify the Department that the facility design and operations have not changed from the permitted activity.
8. **Control of Access.** Access to, and use of, the facility shall be controlled as required by Rule 62-709.500(4)(b), F.A.C.
9. **Monitoring of Waste.**
- a. This permit authorizes the acceptance, processing and management of yard trash mulch and food waste only (including biodegradable materials associated with food waste).
  - b. Wastes shall be monitored as required by Rule 62-709.500(5)(c), F.A.C. Sufficient operating personnel shall be at the facility at all times when waste is received or processed. Incoming wastes shall be inspected for unacceptable wastes immediately after being received. Unacceptable wastes shall be removed immediately from incoming loads.
  - c. The permittee, owner or operator shall not accept mulch from painted or treated (e.g. pentachlorophenol, creosote, or CCA treated) wood for processing or storage at this facility.

**SPECIFIC CONDITIONS:**

- d. The permittee shall not accept hazardous waste or any hazardous substance at this site. Hazardous waste is a waste in Chapter 62-730, F.A.C. Hazardous substances are those defined in Section 403.703, Florida Statute or in any other applicable state or federal law or administrative rule.
10. **Waste Handling Requirements.**
- a. The composting facility shall be operated so as to handle solid wastes on first-in, first-out basis.
- b. Food waste shall be processed **daily** on operating days or removed for off-site disposal **within 24 hours** of receipt at the composting facility.
- c. Material which has completed the composting process shall be removed from the site within three months.
- d. In the event that the storage capacity has been reached, no additional material shall be accepted at the facility until sufficient storage and/or processing capacity has been restored.
11. **Material Storage Requirements.**
- a. The storage capacity of this facility is limited to 580 cubic yards total of in-process material, finished compost, or a combination thereof (i.e. 4-Ag Bags rows). The compost windrows shall be formed and managed in accordance with the layout shown on the Yard Plan (attached).
- b. Storage of yard trash mulch and unprocessed food wastes is limited to the "receiving pad" as shown on the Yard Plan.
- c. Yard trash mulch which will not be made into compost or processed into other usable material shall be removed at least **monthly**.
- d. All solid waste (yard trash mulch, food waste, or compost) received, processed or stored at the composting facility shall be stored, processed and managed in a manner so as not to constitute a fire or safety hazard or a sanitary nuisance. Likewise, these materials shall be stored, processed and managed such that odors and vectors are minimized.
- e. Plastic bags and solid waste other than the authorized materials for the facility, shall be separated and stored in a manner that prevents odor and vector problems and shall be removed **within 24 hours** of receipt. If odors are determined to be a nuisance at the site boundaries, or if rainfall damages the final curing piles, odor controls or waterproof covers may be required.

**SPECIFIC CONDITIONS:**

**12. Sampling and Quality Assurance.**

a. Sampling and analysis of the finished compost shall be in accordance with Rule 62-709.530(1)(a) and (c), F.A.C.

b. Leachate Sampling and Analysis. In the event that the permittee wishes to demonstrate that the leachate produced by the facility operation meets Department water quality standards, then the leachate must be sampled and analyzed for the following parameters:

Water quality parameters listed in 62-701.510(8)(a) and (b), and chlorinated and nitrogen/phosphorus pesticide scan.

1) The demonstration must include a statistically significant number of samples equally distributed throughout the demonstration period.

2) Method Detection Limits must be less than or equal to the Maximum Contaminant Levels established for the individual parameters.

3) All field work done in connection with the facility's Sampling and Analysis Plan shall follow all applicable procedures described in DEP SOP-001/01 (January 2002). All laboratory analyses done in connection with the facility's Sampling and Analysis Plan shall be conducted by firms that are certified by the Department of Health Environmental Laboratory Certification Program in accordance with the schedule referenced in Chapter 62-160, F.A.C. The SOPs utilized and the laboratory's list of certified test methods and analytes must be specifically address the types of sampling and analytical work that are required by the permit and shall be implemented by all persons performing sample collection or analysis related to this permit.

4) The field testing, sample collection, sample preservation and laboratory testing, including the collection of quality control samples, shall be in accordance with the requirements of and methods approved by the Department in accordance with Rule 62-4.246 and Chapter 62-160, F.A.C. Approved methods published by the Department, or as published in Standard Methods or by A.S.T.M., or EPA methods shall be used. Alternate field procedures and laboratory methods may be used if they have been approved according to the requirements of Rule 62-160.220 and 62-160.330, F.A.C.

c. The Department may decrease or increase the parameters to be analyzed for or the frequency of analysis based on monitoring data, changes in the waste stream or processing, or the potential presence of toxic substances.

d. Annually by June 1<sup>st</sup>, and upon completion of the project, a project report shall be provided with all compost and leachate analytical data, with conclusions and recommendations, signed and sealed by a professional engineer.

**SPECIFIC CONDITIONS:**

13. **Recordkeeping.** Records shall be maintained as required by Rule 62-709.530, F.A.C.
  - a. **Annually, no later than June 1st each year,** the owner or operator shall submit an annual report to the Department in accordance with Rule 62-709.530(3), F.A.C.
  - b. The permittee shall record and maintain for three years the information required by Rule 62-709.530(2), F.A.C. The permittee shall compile this information monthly, and shall submit a summary **quarterly, by March 1st, June 1st, September 1st and December 1st each year.** Records shall be available for inspection by Department personnel during normal business hours and shall be sent to the Department upon request.
14. **Stormwater System Management.** Stormwater shall be managed to meet applicable standards of Chapters 62-3, 62-302, and 62-330, F.A.C. The facility shall have a surface water management system operated and maintained to prevent surface water flow onto composting areas, and a stormwater runoff control system operated and maintained to collect and control stormwater to meet requirements of Florida Administrative Code 62-330 and requirements of the respective water management district.
15. **Waste Burning.** Open burning of solid waste is prohibited except in accordance with Rules 62-701.300(3) and 62-256, F.A.C. Controlled burning of solid waste is prohibited at this site except for clean vegetative and wood wastes which may be burned in a permitted air curtain incinerator in accordance with Rule 62-296.401, F.A.C. Any accidental fires which require longer than **one (1) hour** to extinguish must be promptly reported to the Department.
16. **Fire Safety Survey.**
  - 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 1st** 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.

**SPECIFIC CONDITIONS:**

**17. Control of Nuisance Conditions.**

a. The operating authority shall be responsible for the control of odors and fugitive particulates 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 mosquitoes and rodents or request such control measures from the local mosquito control office, as so to protect the public health and welfare.

b. Odor Control. The owner or operator shall inspect the facility boundaries at least **daily** for the presence of odor. In the event that odors are detected, the owner or operator shall **immediately (within 24 hours)** implement corrective actions to abate the odor. If the corrective measures do not sufficiently control the odor, the Department shall be notified in accordance with Specific Condition #18, and a plan for additional corrective measures shall be submitted. In the event that odor complaints are received from adjacent property owners/operators, the facility shall cease accepting material until the odors have been adequately controlled.

**18. Facility Maintenance and Repair.** The site shall be properly maintained including grading, prevention of ponding, and maintenance of composting subgrades and equipment. In the event of damage to any portion of the site facilities, failure of any portion of the facility systems, or in the event of a fire, the permittee shall **immediately (within 24 hours)** notify the Department of Environmental Protection explaining such occurrence, method to prevent reoccurrence, and remedial measures to be taken and time needed for repairs. Written detailed notification shall be submitted to the Department **within seven (7) days** following the occurrence.

**19. 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.

**20. 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.

**21. 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.

PERMITTEE: Sarasota County  
Mr. Gary Bennett

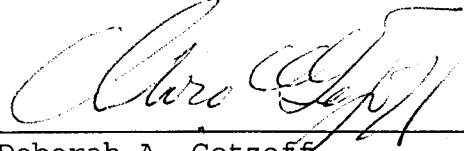
PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

**SPECIFIC CONDITIONS:**

22. **Regulations.** The requirements of Chapter 62-709, F.A.C., effective October 22, 2000, are incorporated into this permit by reference. In the event that the regulations governing this permitted operation are revised, the Department shall notify the permittee, and the permittee shall request modification of those specific conditions which are affected by the revision of regulations to incorporate those revisions.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



Deborah A. Getzoff  
Director of District Management  
Southwest District

PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

ATTACHMENT 1

SPECIFIC CONDITION	SUBMITTAL DUE DATE	REQUIRED ITEM
4.	180 days prior to permit expiration	Permit Renewal Application or extend the expiration date
7.b.	Annually, by June 1st	Submit updated Operations Plan
12.d.	Annually, by June 1st	Submit Project Report
13.a.	Annually, by June 1st	Submit Annual Report
13.b.	Quarterly, by March 1st, June 1st, September 1st, and December 1st	Waste quantity reports, compost production report, compost analysis
18.	Within 24 hours of occurrence	Notify FDEP of system failure
18.	Within 7 days of occurrence	Written notification of system failure, and schedule for repair



1" = 30'

ACCESS RAMP

EARTH BERM

275'

SLOPE  
0.5%

10% SLOPE

24" x 24"  
PUSH STOP

SAMPLE  
BUCKET

25' x 50' CONC  
RECEIVING PAD  
9" SAMPLE COLLECTION  
CURB

AG BAG AREA

(4) BAGS 5' DIA (4 1/4' x 7 1/4')

25' x 50' x 6" CONC PAD  
ON 8" NO 57 CONC.

6" MULCH FILLED

TRENCH DRAIN  
3' x 3' x 50'  
CONC. W/ GEO COVER

18" INTERMEDIATE  
COVER

TRENCH DRAIN  
(TYP)

PROFILE (NTS)

YARD PLAN

FOOD COMPOSTING FACILITY

DEC 2002 P.A. WINGLER, P.E.  
REV 2-3-03

PAGE NO. 3

PAWING  
2/4/03

# Memorandum

## Florida Department of Environmental Protection

### PERMIT COVER MEMO

TO: X DEBORAH A. GETZOFF, Director of District Management

#### FROM/THROUGH:

William Kutash *WFK* ENVIRONMENTAL ADMINISTRATOR  
Susan Pelz, P.E. *SP* SUPERVISOR  
Kim Ford, P.E. *KF* ENGINEER

DATE: 4/10/03

FILE NAME: Food Composting Facility PERMIT #: 200819-001-SO

Operation - CCSWDC

PROGRAM : Solid Waste

COUNTY : Sarasota

TYPE OF PERMIT ACTION: X ISSUE      DENY      MODIFY  
     TRANSFER OWNER      NOD  
     PUBLIC NOTICE      INTENT TO ISSUE

PUBLIC NOTICE PERIOD CLOSED? yes PETITION FILED? no

PERMIT SUMMARY: This permit is to allow the operation of a temporary food composting facility for research as part of a grant. The composting facility will be located over an existing intermediately covered landfill area.

PROFESSIONAL RECOMMENDATION: X APPROVE      DENY

EVALUATION SUMMARY: The application form and related documents were received on June 17, 2002. One deficiency letter was sent, and responses were received on January 17 and February 5, 2003.

This application was deemed complete on **January 17, 2003.**

Published Intent to Issue on March 26, 2003

No Petitions as of April 10, 2003

Department Processing Time = 92 days (as of April 10, 2003)

Total Processing Time (TIH) = 276 days (as of April 10, 2003)

Day 90/30 for this Action is May 8, 2003.

Memorandum

Florida Department of  
Environmental Protection

PERMIT COVER MEMO

TO: ☒ DEBORAH A. GETZOFF, Director of District Management

FROM/THROUGH:

William Kutash ENVIRONMENTAL ADMINISTRATOR  
Susan Pelz, P.E. SUPERVISOR 3/14/03  
Kim Ford, P.E. ENGINEER 3/14/03

DATE: 3/14/03

FILE NAME: Food Composting Facility PERMIT #: 200819-001-SO  
Operation - CCSWDC  
PROGRAM : Solid Waste COUNTY : Sarasota

TYPE OF PERMIT ACTION: ☐ ISSUE ☐ DENY ☐ MODIFY  
☐ TRANSFER OWNER ☐ NOD  
☐ PUBLIC NOTICE ☒ INTENT TO ISSUE

PUBLIC NOTICE PERIOD CLOSED? ☐ PETITION FILED? ☐

PERMIT SUMMARY: This permit is to allow the operation of a temporary food composting facility for research as part of a grant. The composting facility will be located over an existing intermediately covered landfill area.

PROFESSIONAL RECOMMENDATION: ☒ APPROVE ☐ DENY

EVALUATION SUMMARY: The application form and related documents were received on June 17, 2002. One deficiency letter was sent, and responses were received on January 17 and February 5, 2003.

This application was deemed complete on January 17, 2003.

Department Processing Time = 82 days (as of March 10, 2003)  
Total Processing Time (TIH) = 266 days (as of March 10, 2003)

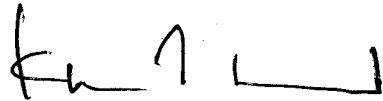
Day 90/30 for this Action is April 17, 2003.

P.E. CERTIFICATION

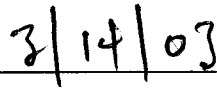
Application No.: 200819-001-SO

**Re: Food Composting Facility Operation - CCSWDC**

I HEREBY CERTIFY that in my professional judgment the engineering features described in the above referenced application provide reasonable assurance of compliance with applicable provisions of Florida Administrative Code Chapter 62-701. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical and structural, features).



\_\_\_\_\_  
(Signed)



\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Seal)

**Ford, Kim**

**From:** Joyal, Francine  
**Sent:** Monday, April 14, 2003 10:17 AM  
**To:** 'cory jamieson'; Ford, Kim  
**Cc:** Labie, Silky; White, Jesse  
**Subject:** RE: Sarasota Food Waste Recycling - Sampling Plan Format

Cory,

I will defer to the District regarding 2 separate plans for permit-required and optional, or both elements combined into one plan. But if they are combined into one plan, I recommend those associated with permit requirements be clearly identified.

Francine

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Friday, April 11, 2003 10:53 AM  
**To:** Ford, Kim; Joyal, Francine  
**Cc:** Labie, Silky; White, Jesse  
**Subject:** Sarasota Food Waste Recycling - Sampling Plan Format

Kim and Francine,

After speaking with the FDEP QA office, I've decided to submit the sampling plan for the Project utilizing the guidelines set forth in two DEP documents: DEP-QA-002/02, and "Quality Assurance Project Plan for Testing Compost Made from Solid Waste" (DEP form 62-160.900, as of 6-96).

If the information included in these documents is not sufficient to provide a satisfactory sampling plan for use by the Department in relation to desired DQO's and data use, then please let me know. Also, will it be necessary to compose two separate sampling plans for permit-required sampling and optional sampling? Or can both be incorporated in to the same plan? Thank you very much for your help. -Cory

Cory Jamieson  
 Resource Management Group  
 1143 Central Ave.  
 Sarasota, FL 34236  
 Ph: (941) 358-7730  
 Fx: (941) 362-4290

**Ford, Kim**

---

**From:** jesse white [jesse.white@rmg.us]  
**Sent:** Monday, April 14, 2003 9:45 AM  
**To:** Ford, Kim  
**Cc:** Cory Jamieson; Boroff, Suzanne; Jean Nutter; Project Manager Paul A. Wingler  
**Subject:** Permit for Sarasota Food Composting Project

Dear Kim,

Thank you for calling last week to keep us appraised of the permit progress.

We are working on the sampling plan draft and look forward to working with you on finalizing it.

Best regards,

Jesse White  
President  
Resource Management Group, Inc.  
jesse@rmg.us

[www.rmg.us](http://www.rmg.us)

-----  
"RMG - Creating sustainable programs for business and government to manage solid waste efficiently through waste reduction, materials reuse, recycling, and compost production."

Resource Management Group, Inc.  
1143 Central Ave  
Sarasota, FL 34236  
941-358-7730  
\*NEW\* 941-362-4290 FAX  
-----

**From:** cory jamieson [cory@rmg.us]

**Sent:** Friday, April 11, 2003 10:53 AM

**To:** Ford, Kim; Joyal, Francine

**Cc:** Labie, Silky; White, Jesse

**Subject:** Sarasota Food Waste Recycling - Sampling Plan Format

After speaking with the FDEP QA office, I've decided to submit the sampling plan for the Project utilizing the guidelines set forth in two DEP documents: DEP-QA-002/02, and "Quality Assurance Project Plan for Testing Compost Made from Solid Waste" (DEP form 62-160-900, as of 6-96).

the information included in these documents is not sufficient to provide a satisfactory sampling plan for use by the Department in relation to desired DQO's and data when please let me know. Also, will it be necessary to compose two separate sampling plans for permit-required sampling and optional sampling? Or can both be incorporated in to the same plan? Thank you very much for your help. -Cory

Cory Jamieson  
Resource Management Group  
143 Central Ave.  
Sarasota, FL 34236  
Ph: (941) 358-7730  
Fax: (941) 362-4290

Ford, Kim

**From:** cory jamieson [cory@rmg.us]  
**Sent:** Friday, April 11, 2003 10:29 AM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul  
**Subject:** Minutes for Teleconference April 3rd

Attached is the minutes for our conference of April 3rd. Please submit comments or suggestions on Monday. Thanks, Cory

Cory Jamieson  
Resource Management Group  
143 Central Ave.  
Tarasota, FL 34236  
Ph: (941) 358-7730  
Fax: (941) 362-4290

4/11/03



# Food Recovery Project

## Meeting Minutes

IG1-14

Date: Thursday, April 3<sup>rd</sup>, 2003  
Time: 2:00pm to 3:00pm  
Location: Teleconference  
Purpose: Discuss the development of a sampling and analysis plan for the proposed food waste composting facility in Sarasota.

### Participants:

Francine Joyal: FDEP Tallahassee  
Kim Ford: FDEP District  
Susan Pelz: FDEP District  
Monica Ozoires-Hampton: SWFREC  
Jean Nutter: Sarasota County  
Jesse White: RMG  
Cory Jamieson: RMG

### Topics Discussed

#### *A. Discussion Document*

The discussion document that RMG prepared and submitted to participants prior to the conference outlined specific areas of the composting process requiring significant capital investment to comply with regulations. Conference participants reviewed this document and the main points were reviewed in a discussion led by Jesse White of RMG. This discussion was centered about the idea of a sampling plan that is based upon the regulatory challenges faced by the project.

- The first item discussed as a part of the document was the receiving pad. FDEP indicated that the following might be germane for a sampling plan to consider.
  - A leachate collection tank does not have to be double-walled if it is above ground.
  - Leachate from the pad is regulated as leachate.
  - The sampling plan should show that leachate complies with Department ground and surface water criteria.
  - The first half-inch of a rain event will contain analytes of concern and they will be the most concentrated.
  - A double liner pond is required for leachate, but not stormwater.
  - A roof might serve as an alternative to a collection system
- Compost Pad
  - A sampling plan should show leachate and water from storm events do not violate Department water quality standards.
  - A Synthetic Precipitation Leaching Procedure (SPLP), EPA method, could be a valuable tool in analyzing de minimus compost effects upon harvest.
- Curing
  - Curing on native soils exposes compost to weed seeds, nematodes, etc.
  - Monitoring of rain event leachate from curing piles for Department water quality criteria will be valuable to a sampling plan.

## Meeting Minutes

- A pad would be required for SPLP data to be accurate.
- Much of the curing process may take place inside the Ag-Bag, so little change in leachate would be observed over a short curing period outside the bag.

As a result of these discussion points a number of conclusions were arrived at. The data would be presented to the department as a body of information, the use of this information would be decided by FDEP. This includes possible rule changes and permitting implications dependant upon the results.

RMG raised concerns that if a permit is required to operate a compost facility on a farm, to be used on its fields, then many farmers would opt not to develop an operation. Commercial operations would be expected to be subject to permitting as normal.

FDEP indicated that if the leachate from the facility was shown to adhere to the water quality standards of the Department then a rule change might not be necessary to ease permitting of future facilities.

FDEP Tallahassee indicated that an alternate procedure request might be useful. The request would include the data collected by the project and the desired procedural modifications. This alternate procedure would show that the same environmental protection is provided by the new procedures as the current procedures written into rule. Tallahassee would review this request and submit it to the districts for their input. If they agree that the new procedure affords the same environmental protection then the facility can adopt their alternate procedure. However, this procedure will be applicable only to that particular facility and similar operations would have to undergo the same process.

RMG put forth the idea that this project could provide a blueprint for future Ag-Bag operations. If a commercial operation were to develop using the same techniques outlined by this project then FDEP would know what environmental impacts to expect. All agreed this could streamline both permitting, and alternate procedure requests.

***C. Submittal Process***

Due to time constraints imposed on the project, RMG suggested the sampling plan be completed two weeks from the time of the meeting. All parties agreed that this was a realistic goal. This will require extensive communication between the particular parties involved and necessitates the creation of a committee to review and give feedback as the sampling plan develops. Specifically the plan will address what parameters are being analyzed for, how often samples are being taken, and at what part of the facility

A work group was discussed and developed for the purposes of the plan's creation and implementation. The group will consist of the following parties.

FDEP District – Kim Ford  
FDEP Tallahassee – Francine Joyal  
RMG – Cory Jamieson  
Sarasota County – Jean Nutter and Paul Wingler

Consultant – Dr. Monica Ozores-Hampton

RMG will develop the sampling plan and submit it for review to the above parties. They will supply feedback and comments for revision. RMG will make the suggested changes and submit a final draft to FDEP District and Tallahassee.

**RMG**

Resource Management Group, Inc.  
1143 Central Ave.  
Sarasota, FL 34236

941-358-7730  
Fax: 941-362-4290

# Fax

To: Kim Ford From: Cory Jamieson  
Fax: 813 744-6125 Pages: 2 including cover  
Phone: 813 744-6100 Ext: 382 Date: 4/4/2003  
Re: Affidavit of Notice Publication - Sarasota Compost Facility

Kim - If you require the real thing  
let me know.

**SARASOTA HERALD-TRIBUNE  
PUBLISHED DAILY  
SARASOTA, SARASOTA COUNTY, FLORIDA**

STATE OF FLORIDA

SARASOTA HERALD TRIBUNE

COUNTY OF SARASOTA

RESOURCE MANAGEMENT GROUP  
1143 CENTRAL AVENUE  
CORY JAMIESON  
SARASOTA, FL 34236

REFERENCE: 60053235 Permit  
3PBC007003 STATE OF FLORIDA DEP

Before the undersigned authority, personally appeared Moya Neville, who on oath says she is the Advertising Director of the Herald-Tribune, a daily newspaper published at Sarasota, in Sarasota County, Florida; that the attached copy of advertisement, was published in said newspaper on the dates listed.

Affiant further says that the said Herald Tribune is a newspaper published at Sarasota, in said Sarasota County, Florida, and that the said newspaper has heretofore been continuously published in said Sarasota County, Florida, each day and has been entered as periodicals matter at the post office in Sarasota, in said Sarasota County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

PUBLISHED ON: 03/26

TOTAL COST: 244.80  
FILED ON: 03/26/03

AD SPACE: 120 LINE

SWORN TO AND SUBSCRIBED BEFORE ME THIS 26<sup>th</sup> DAY OF MARCH A.D., 2003 BY MOYA NEVILLE WHO IS PERSONALLY KNOWN TO ME.

SEAL

OFFICIAL NOTARY SEAL  
BOBBIE J CLARK  
NOTARY PUBLIC STATE OF FLORIDA  
COMMISSION NO. CC068894  
MY COMMISSION EXP. OCT. 11, 2004

NOTARY PUBLIC

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF PROPOSED AGENCY ACTION  
ON PERMIT APPLICATION**

The Department gives notice of its intent to issue a permit (File No. 200310-001-80) to Sarasota County, to Mr. Gary Bennett, 4000 Knights Trail Road, Nokomis, Florida 34275, who applied on June 17, 2002 to the Department of Environmental Protection for a permit to operate a composting facility (approximately 1/2 acre), referred to as the Food Composting Facility, subject to the specific and general conditions attached located on existing CC&WPC land at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3800 Commonwealth Boulevard, Mail Station 30, Tallahassee, Florida 32309-3000, within fourteen (14) days of publication of this notice. A copy of the petition must also be mailed at the time of filing to the applicant at the address indicated. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, 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 the Department's 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 the facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this 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 of 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, Florida Statutes, and to participate as a party to the proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-9.207, Florida Administrative Code.

The application 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 Department of Environmental Protection, Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33618-6818.  
Published: March 28, 2003

ord, Kim

From: cory jamieson [cory@rmg.us]  
Sent: Thursday, April 03, 2003 12:25 PM  
To: Ford, Kim  
Cc: pwingler@co.sarasota.fl.us; White, Jesse  
Subject: Notice of Intent Affidavit

m,

The Sarasota Herald-Tribune sent an affidavit confirming publication of the intent to issue notice to our address at RMG on Monday. We are expecting it anytime and will send you a copy as soon as it arrives. In the meantime I've attached a copy of the notice to this mailing. Talk with you soon. -Cory

Cory Jamieson  
Resource Management Group  
43 Central Ave.  
Sarasota, FL 34236  
Tel: (941) 358-7730  
Fax: (941) 362-4290

CLASSIFIED: 953-5555

WEDNESDAY, MARCH 26, 2003

0001 Legals

0001 Legals

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF PROPOSED AGENCY ACTION  
ON PERMIT APPLICATION

The Department hereby gives notice of its intent to issue a permit (File No. 20020-001-001) to Sarasota County, and Mr. Gary Bennett, 4000 Knight Trail Road, Nokomis, Florida 34958, who applied on June 17, 2002 to the Department of Environmental Protection for a permit to operate a composting facility (approximately 12 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on existing 605,000 square feet of land at the north end of Knight Trail Road, northeast of Venice, Sarasota County, Florida.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding, hearing, in accordance with Section 720.57, Florida Statutes. The petition must contain the information set forth below and must be filed, received, by the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 36, Tallahassee, Florida 32399-0036, within fourteen (14) days of publication of this notice. A copy of the petition must also be mailed at the time of filing to the applicant at the address indicated. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination hearing under Section 220.07, Florida Statutes.

The petition shall contain the following information: (a) The name, address, and telephone number of each petitioner; (b) The address, name and address of the Department Permit File Number and the county in which the project is proposed; (c) A statement of how and when each petitioner received notice of the Department's action; (d) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (e) A statement of the material facts claimed by petitioner; (f) A statement of the facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (g) A statement of which rule or statute petitioner contends requires reversal or modification of the Department's action or proposed action; and (h) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take in response 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 require a party to the proceeding. The petition must comply with the requirements specified above and be filed, received, within 14 days of publication of this notice at 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 220.07, Florida Statutes, and to participate as a party to the proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28.0207, Florida Administrative Code.

This application 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 Department of Environmental Protection, Southwest District Office, 3800 Queen of the South, Tampa, Florida 33639-5015. Published: March 26, 2003.

ALBRITTON TOWING  
5435 CATALYST AVENUE  
SARASOTA, FL 34238

Auction at Sawyer Court  
Storage, 4041 Sawyer Ct.

**Teleconference, April 3<sup>rd</sup>, 2003**

---

Date: Thursday, April 3, 2003

Location: Teleconference

Purpose: Discuss the development of a sampling and analysis plan for the proposed food waste composting facility in Sarasota.

Desired Results: Specific feedback from FDEP and others regarding the purposes of a sampling plan, what it will cover, and the process by which it will be approved. Organize a workgroup.

Start Time: 2:00 PM

End Time: 2:45 PM

**Participants**

Francine Joyal: FDEP Tallahassee

Susan Pelz: FDEP District

Kim Ford: FDEP District

Jean Nutter: Sarasota County

Paul Wingler: Sarasota County

Jesse White: RMG

Cory Jamieson: RMG

**AGENDA**Item I – Review Discussion Document

- Receiving Pad
- Compost Pad
- Curing

Item II – Approval Process

- Outline Involved Parties
- Develop Work Group
- Discuss Authority, Implementation, and Reporting

NOTES DHP will look at worst case  
SPLP may be preferred for solids  
A statistically significant # of samples  
to account for seasonal variability  
is expected.





COPY

2F HERALD-TRIBUNE

www.heraldtribune.com

CLASSIFIED: 953-5555

WEDNESDAY, MARCH 26, 2003

0001 Legals

0001 Legals

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF PROPOSED AGENCY ACTION  
NON-PERMIT APPLICATION

The Department gives notice of its intent to issue a permit (File No. 200819-001-SC) to Sarasota County, c/o Mr. Gary Bennett, 4000 Knights Trail Road, Nokomis, Florida 34275, who applied on July 17, 2002 to the Department of Environmental Protection for a permit to operate a composting facility (approximately 1/2 acre), related to an the Food Composting Facility, subject to the specific and general conditions attached, located on existing OCSWDC landfill at the north end of Knights Trail Road, northwest of Venice, Sarasota County, Florida.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3800 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3400, within fourteen (14) days of publication of this notice. A copy of the petition must also be mailed at the time of filing to the applicant at the address indicated. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, 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 the Department's 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 the facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this 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, Florida Statutes, and to participate as a party to the proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28.1-207, Florida Administrative Code.

The application 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 Department of Environmental Protection, Southeast District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-0316. Published March 26, 2003.

ord, Kim

**From:** cory jamieson [cory@rmg.us]  
**Sent:** Wednesday, April 02, 2003 4:40 PM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul  
**Subject:** materials for conference  
ear Associates,

Attached are an agenda for the conference and the discussion document. Please give these a quick review prior to the call. Thanks. -Cory

Cory Jamieson  
Resource Management Group  
143 Central Ave.  
arasota, FL 34236  
h: (941) 358-7730  
x: (941) 362-4290

## **Teleconference, April 3<sup>rd</sup>, 2003**

---

Date: Thursday, April 3, 2003

Location: Teleconference

Purpose: Discuss the development of a sampling and analysis plan for the proposed food waste composting facility in Sarasota.

Desired Results: Specific feedback from FDEP and others regarding the purposes of a sampling plan, what it will cover, and the process by which it will be approved. Organize a workgroup.

Start Time: 2:00 PM

End Time: 2:45 PM

### **Participants**

Francine Joyal: FDEP Tallahassee

Susan Pelz: FDEP District

Kim Ford: FDEP District

Jean Nutter: Sarasota County

Paul Wingler: Sarasota County

Jesse White: RMG

Cory Jamieson: RMG

### **AGENDA**

#### Item I – Review Discussion Document

- Receiving Pad
- Compost Pad
- Curing

#### Item II – Approval Process

- Outline Involved Parties
- Develop Work Group
- Discuss Authority, Implementation, and Reporting

# **Sampling Plan Discussion Document**

Submitted to:  
Florida Department of Environmental Protection  
as a part of the Sarasota County  
Food Recovery and Recycling Project  
Innovative Recycling Grant Number IG1-14

## **Introduction**

The concept of a sampling plan that goes beyond compliance is an outgrowth of Sarasota County's desire to commercialize composting of food discards mixed with yard trimmings, after the pilot program being conducted in an active cell of the County's landfill. During the County's attempt to site a composting facility on a farm and, later, in an unlined section of the Central County Solid Waste Disposal Complex (landfill), barriers were encountered to facility permitting.

Sarasota's experience is that the current standards for construction and operation of a composting facility make costs too high to encourage this kind of waste reduction. If sampling can demonstrate that environmental risks are minimized, it is hoped that FDEP and the legislature will consider writing exceptions into the Solid Waste and Compost Rules, to allow limited food waste composting when conducted using certain best management practices.

Following is a discussion of the three issues in this project which have the highest capital and operational costs. Please review these issues, and work with us to develop a sampling plan that will develop data to evaluate the validity of changing the way Florida regulates food residuals composting operations.

## **ISSUE 1: Feedstock Receiving Pad**

### *Description of Process*

On the Feedstock Receiving Pad, food residuals are received, inspected for unpermitted materials removal, size reduced, and mixed with bulking agent. During this process, leachate may be generated. If rain occurs, leachate may be produced from this operation.

### *Current Rule Requirements*

Current rules require that any liquid produced on this pad must be managed as leachate, whether or not food discards are present.

### *Impact of Current Rules*

Leachate management requires either continuous pumping into an approved leachate management system, e.g., sanitary sewer or placement in a double walled storage tank. Both of these options are prohibitively expensive for a farmer or small scale commercial composting operation to implement.

### *Preferred Alternative*

- No requirement for continuous feed of leachate into treatment system.
- No requirement for double lined storage tanks.
- Exemption from the "tank rule."
- Storage tank for leachate generated on pad sized to accommodate leachate generated during compost receipt and processing, plus \_\_ inches of rain, based on the average 1 hour rainfall in a summer storm.
- Rain on pad when waste is not being received can be sent to stormwater treatment system, but not handled as leachate.

### *Sampling Plan Impact*

Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?

## **ISSUE 2: Composting Pad Requirements**

### *Description of Process*

The Ag-Bag System is an invessel composting system, which contains the food discards and bulking agent for the first 3-6 months of the composting process. Ag-Bag can operate on virtually any surface. At the conclusion of the Ag-Bag composting phase, the bags are opened and the compost removed for curing, the final composting phase. District has raised concerns that during harvest, compost may fall on the pad, or be left in the Ag-Bag footprint, and that this compost is defined as "solid waste" until fully matured.

### *Current Rule Requirements*

It is not entirely clear what surface is required for the placement of the Ag Bag. However, to completely remove all compost during the harvest phase would require the construction of a concrete or asphalt operating pad. Additionally, if compost is not completely removed from the operating pad, stormwater generated on this pad might be required to be managed as leachate.

### *Impact of Current Rules*

Constructing a concrete, asphalt, or even soil-cement composting pad is cost prohibitive.

### *Preferred Alternative*

- Permit Ag-Bag composting on native soils with no pad construction requirements.
- Permit harvesting to result in <3% residual on the operating pad.
- No requirement to handle stormwater generated on this pad to be managed as leachate.

### *Sampling Plan Impact*

Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?

### **ISSUE 3: Curing Pad Requirements**

#### *Description of Process*

The final phase of the composting process is “curing” which occurs in static piles created when the Ag-Bags are harvested. This material is “immature” compost, which has many uses and many limitations from a product marketing and liability standpoint.

#### *Current Rule Requirements*

Compost in the curing phase is still considered solid-waste. The Compost Rule requires compost to comply with several parameters before it can be considered mature.

#### *Impact of Current Rules*

Liquid generated from the compost and stormwater produced on the curing pad is considered to be leachate, requiring the management strategies described above in “Issue 1.” Typically, a concrete or other impermeable pad is required for storage of compost during the curing phase.

#### *Preferred Alternative*

- No impermeability requirements for curing pad.
- Leachate control requirements replaced with best management practices for curing compost that demonstrates no analytes of concern (metals).
- Best management practices to handle any potential nutrient issues.

#### *Sampling Plan Impact*

Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?



Message

ord, Kim

**From:** Joyal, Francine  
**Sent:** Tuesday, April 01, 2003 3:02 PM  
**To:** 'cory jamieson'  
**Cc:** Boroff, Suzanne; Clark, Jan Rae; Pelz, Susan; Ford, Kim; Jessie White  
 (jwhite@recyclesmart.com)  
**Subject:** RE: Threshold and Reporting Limits

cory,

I would use the proposed cleanup target levels (and the Practical Quantitation Levels (PQLs) for the proposed analytes list in Chapter 62- 777, F.A.C., where the cleanup criteria is less than the target PQL.) for guidance where there is no specific maximum concentration for the media (i.e., surface water, drinking water or compost product) refer to the draft Table I (Groundwater and Surface Water Cleanup Target Levels) for water quality and Table II (Soil Cleanup Target Levels) for the compost. The Draft Cleanup target levels can be downloaded from <http://fddep.ifas.ufl.edu/>, and the Practical Quantitation Levels (PQLs) can be downloaded from <http://www.dep.state.fl.us/labs/pqitables.htm>.

Francine

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Monday, March 31, 2003 10:15 AM  
**To:** Joyal, Francine  
**Subject:** Threshold and Reporting Limits

Francine,

The Class I surface water limits (Table 62-302.530) specify the maximum concentrations of some of the pesticides we'll be looking for, but not all. Is there another source which I could use to get this information? Also, what would be your desired reporting limits for these parameters? What about results for the compost itself? Method detection limits vary with matrix, should the maximum concentrations and reporting limits for compost be the same as surface water? Please let me know.  
 Thanks for your help. -cory

Cory Jamieson  
 Resource Management Group  
 1143 Central Ave.  
 Sarasota, FL 34236  
 Ph:(941) 358-7730  
 Fx: (941) 362-4290

Message

ord, Kim

**From:** Paul Wingler [PWINGLER@co.sarasota.fl.us]  
**Sent:** Tuesday, April 01, 2003 1:29 PM  
**To:** Robesleep@aol.com; Jean Nutter; Joyal, Francine; Ford, Kim; Pelz, Susan; Boroff, Suzanne; cory@rmg.us; jesse@rmg.us  
**Subject:** RE: Compost Sampling Plan Conference

ull: It could work for me. P

>>> "Joyal, Francine" <Francine.Joyal@dep.state.fl.us> 4/1/2003 10:45:51 AM >>>  
 Confirming that 2:00 p.m. on Thursday, April 3 is okay with me.

Francine

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Tuesday, April 01, 2003 10:19 AM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** Compost Sampling Plan Conference

Dear Associates,

A conference call with the parties involved with the Sarasota Food Waste Recycling Project is needed to move this project towards the production of a sampling plan. The discussion document of 3/26 was intended to begin communication between involved parties regarding this. RMG has attempted to outline the goals that the sampling plan should address. A discussion of the strengths and weaknesses of this approach, as well as the goals of the Department, need to be integrated into the plan itself. Substantial input from FDEP is still needed to develop this sampling plan in a way that will provide valuable, and usable, information to the Department.

The participants of the conference call should be:

FDEP Tallahassee - Francine Joyal  
 FDEP District - Kim Ford and Susan Pelz  
 Sarasota County - Jean Nutter  
 RMG - Jesse White and Cory Jamieson

The conference call is currently scheduled for 2:00pm on Thursday afternoon. If an alternate time would be better for you please reply to this message and we will make other arrangements.

My sincere thanks to all of you for your help so far and for your continued support. -Cory

Cory Jamieson  
 Resource Management Group  
 1143 Central Ave.  
 Sarasota, FL 34236  
 Ph: (941) 358-7730  
 Fx: (941) 362-4290

Ford, Kim

**From:** cory jamieson [cory@rmg.us]  
**Sent:** Wednesday, April 02, 2003 2:15 PM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul  
**Subject:** Phone Conference - April 3rd, 2:00 pm

Dear Associates,  
Currently the participants for the Sarasota County Compost Facility phone conference are as follows:

DEP Tallahassee: Francine Joyal  
DEP District: Susan Pelz, Kim Ford  
Sarasota County: Jean Nutter, Paul Wingler  
MG: Jesse White, Cory Jamieson

The conference will begin tomorrow (Thursday) at 2:00pm and last approximately 45 minutes.  
To join call this toll-free number: 877-737-0509  
Conference Passcode is 665681 #

Thanks everybody, we'll talk with you soon. -Cory

Cory Jamieson  
Resource Management Group  
143 Central Ave.  
Sarasota, FL 34236  
h: (941) 358-7730  
x: (941) 362-4290



Ford, Kim

**From:** Pelz, Susan  
**Sent:** Wednesday, April 02, 2003 1:42 PM  
**To:** 'cory jamieson'; Jesse White; Boroff, Suzanne; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** RE: Compost Sampling Plan Conference

Kim and I can be there, but you need to give us a phone # to call. How long do you anticipate the teleconference to be?

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Wednesday, April 02, 2003 1:29 PM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** Re: Compost Sampling Plan Conference

Current Participants for Teleconference on Thursday, April 3, at 2:00 pm.

Francine Joyal  
Paul Wingler  
Jean Nutter  
Jesse White  
Cory Jamieson

----- Original Message -----

**From:** jesse white  
**To:** cory jamieson  
**Sent:** Wednesday, April 02, 2003 10:40 AM  
**Subject:** RE: Compost Sampling Plan Conference

how many rsvp's do we have?

j

Jesse White  
President  
Resource Management Group, Inc.  
jesse@rmg.us

[www.rmg.us](http://www.rmg.us)

-----  
"RMG - Creating sustainable programs for business and government to manage solid waste efficiently through waste reduction, materials reuse, recycling, and compost production."

Resource Management Group, Inc.  
1143 Central Ave  
Sarasota, FL 34236  
941-358-7730  
\*NEW\* 941-362-4290 FAX

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Tuesday, April 01, 2003 10:19 AM  
**To:** Jesse White; Suzanne Boroff; Susan Pelz; Kim Ford; Jean Nutter; Francine Joyal; Bob Sleep; Paul Wingler  
**Subject:** Compost Sampling Plan Conference

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Cory Jamieson  
Resource Management Group  
1143 Central Ave.  
Sarasota, FL 34236  
Ph: (941) 358-7730  
Fx: (941) 362-4290

ord, Kim

**From:** Boroff, Suzanne  
**Sent:** Wednesday, April 02, 2003 3:07 PM  
**To:** 'cory jamieson'; Jesse White; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** RE: Phone Conference - April 3rd, 2:00 pm

Cory,  
 I am going to try to listen in. Am taking the next couple of days off, but have to call in on another call tomorrow at 1:00 and will try to join you all after that. I probably will have no comments as I am in the learning mode with this project.

Suzanne Boroff  
 Environmental Specialist II  
 Florida Department of Environmental Protection  
 Waste Reduction Section, Recycling Program  
 600 Blair Stone Rd., MS 4570  
 Tallahassee, FL 32399-2400  
**PLEASE NOTE NEW CONTACT NUMBERS**  
 Phone: 850/245-8718 SUNCOM: 205-8718 Fax 850/245-8803  
 suzanne.boroff@dep.state.fl.us

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Wednesday, April 02, 2003 2:15 PM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** Phone Conference - April 3rd, 2:00 pm

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FDEP Tallahassee: Francine Joyal  
 FDEP District: Susan Pelz, Kim Ford  
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 Conference Passcode is 665681#

Thanks everybody, we'll talk with you soon.-Cory

Cory Jamieson  
 Resource Management Group  
 1143 Central Ave.



Sarasota, FL 34236  
Ph: (941) 358-7730  
Fx: (941) 362-4290

**Ford, Kim**

**From:** Joyal, Francine  
**Sent:** Tuesday, April 01, 2003 10:46 AM  
**To:** 'cory jamieson'; Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Bob Sleep; Paul Wingler  
**Subject:** RE: Compost Sampling Plan Conference

Confirming that 2:00 p.m. on Thursday, April 3 is okay with me.

Francine

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Tuesday, April 01, 2003 10:19 AM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** Compost Sampling Plan Conference

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The conference call is currently scheduled for 2:00pm on Thursday afternoon. If an alternate time would be better for you please reply to this message and we will make other arrangements.

My sincere thanks to all of you for your help so far and for your continued support. -Cory

Cory Jamieson  
Resource Management Group  
1143 Central Ave.  
Sarasota, FL 34236  
Ph: (941) 358-7730  
Fx: (941) 362-4290



**Ford, Kim**

**From:** Joyal, Francine  
**Sent:** Thursday, March 27, 2003 2:43 PM  
**To:** 'cory jamieson'; Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Bob Sleep; Paul Wingler  
**Subject:** RE: Sarasota Composting - Sampling Plan Technical Advisory Committee

Cory,

I have attached a marked up copy of the document you requested comments on.

Francine

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Wednesday, March 26, 2003 12:26 PM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul Wingler  
**Subject:** Sarasota Composting - Sampling Plan Technical Advisory Committee

Dear Associates,

Sarasota County and RMG have been composing a sampling plan for the composting facility and would like to form a Technical Advisory Committee to continue developing it. Attached is a document prepared by RMG that outlines the goals of a sampling plan. Please review this document and submit your comments to me before 12:00 PM on Friday. Thank you for your help. -Cory

Cory Jamieson  
Resource Management Group  
1143 Central Ave.  
Sarasota, FL 34236  
Ph: (941) 358-7730  
Fx: (941) 362-4290

# Sampling Plan Discussion Document

Submitted to:  
Florida Department of Environmental Protection  
as a part of the Sarasota County  
Food Recovery and Recycling Project  
Innovative Recycling Grant Number IG1-14

## **Introduction**

The concept of a sampling plan that goes beyond compliance is an outgrowth of Sarasota County's desire to commercialize composting of food discards mixed with yard trimmings, after the pilot program being conducted in an active cell of the County's landfill. During the County's attempt to site a composting facility on a farm and, later, in an unlined section of the Central County Solid Waste Disposal Complex (landfill), barriers were encountered to facility permitting.

Sarasota's experience is that the current standards for construction and operation of a composting facility make costs too high to encourage this kind of waste reduction. If sampling can demonstrate that environmental risks are minimized, it is hoped that FDEP and the legislature will consider writing exceptions into the Solid Waste and Compost Rules, to allow limited food waste composting when conducted using certain best management practices.

***Comment:*** The legislature amends the statutes, DEP amends the Solid Waste (Chapter 62-701, F.A.C.) and Compost (Chapter 62-709, F.A.C.) Rules.

Following is a discussion of the three issues in this project which have the highest capital and operational costs. Please review these issues, and work with us to develop a sampling plan that will develop data to evaluate the validity of changing the way Florida regulates food residuals composting operations.

## **ISSUE 1: Feedstock Receiving Pad**

### *Description of Process*

On the Feedstock Receiving Pad, food residuals are received, inspected for unpermitted materials removal, size reduced, and mixed with bulking agent. During this process, leachate may be generated. If rain occurs, leachate may be produced from this operation.

### *Current Rule Requirements*

Current rules require that any liquid produced on this pad must be managed as leachate, whether or not food discards are present.

### *Impact of Current Rules*

Leachate management requires either continuous pumping into an approved leachate management system, e.g., sanitary sewer or placement in a double walled storage tank. Both of these options are prohibitively expensive for a farmer or small scale commercial composting operation to implement.

**Comment:** How do these costs compare to the cost of constructing a roof over the pad and sloping to keep runoff from flowing onto the pad? That would decrease the amount of liquid viewed as leachate.

### *Preferred Alternative*

- No requirement for continuous feed of leachate into treatment system.
- No requirement for double lined storage tanks.
- Exemption from the "tank rule."
- Storage tank for leachate generated on pad sized to accommodate leachate generated during compost receipt and processing, plus \_\_ inches of rain, based on the average 1 hour rainfall in a summer storm.
- Rain on pad when waste is not being received can be sent to stormwater treatment system, but not handled as leachate.

**Comment:** Note that this "switching" of collection systems may be difficult to approve in that it would be very easy to keep the "switch" set to stormwater system.

### *Sampling Plan Impact*

Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?

**Comment:** Data needed for water quality parameters, chlorinated pesticides and nitrogen/phosphorus pesticides. The number of samples needed depends on seasonal variation, variability in the data, and how close to the regulatory limit the analytical data is.

## **ISSUE 2: Composting Pad Requirements**

### *Description of Process*

The Ag-Bag System is an invessel composting system, which contains the food discards and bulking agent for the first 3-6 months of the composting process. Ag-Bag can operate on virtually any surface. At the conclusion of the Ag-Bag composting phase, the bags are opened and the compost removed for curing, the final composting phase. District has raised concerns that during harvest, compost may fall on the pad, or be left in the Ag-Bag footprint, and that this compost is defined as "solid waste" until fully matured.

### *Current Rule Requirements*

It is not entirely clear what surface is required for the placement of the Ag Bag. However, to completely remove all compost during the harvest phase would require the construction of a concrete or asphalt operating pad. Additionally, if compost is not completely removed from the operating pad, stormwater generated on this pad might be required to be managed as leachate.

### *Impact of Current Rules*

Constructing a concrete, asphalt, or even soil-cement composting pad is cost prohibitive.

### *Preferred Alternative*

- Permit Ag-Bag composting on native soils with no pad construction requirements.
- Permit harvesting to result in <3% residual on the operating pad.
- No requirement to handle stormwater generated on this pad to be managed as leachate.

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Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?

**Comment: Data needed for water quality parameters, chlorinated pesticides and nitrogen/phosphorus pesticides. The number of samples needed depends on seasonal variation, variability in the data, and how close to the regulatory limit the analytical data is.**

### **ISSUE 3: Curing Pad Requirements**

#### *Description of Process*

The final phase of the composting process is “curing” which occurs in static piles created when the Ag-Bags are harvested. This material is “immature” compost, which has many uses and many limitations from a product marketing and liability standpoint.

#### *Current Rule Requirements*

Compost in the curing phase is still considered solid-waste. The Compost Rule requires compost to comply with several parameters before it can be considered mature.

#### *Impact of Current Rules*

Liquid generated from the compost and stormwater produced on the curing pad is considered to be leachate, requiring the management strategies described above in “Issue 1.” Typically, a concrete or other impermeable pad is required for storage of compost during the curing phase.

#### *Preferred Alternative*

- No impermeability requirements for curing pad.
- Leachate control requirements replaced with best management practices for curing compost that demonstrates no analytes of concern (metals).
- Best management practices to handle any potential nutrient issues.

#### *Sampling Plan Impact*

Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?

**Comment: Data needed for water quality parameters, chlorinated pesticides and nitrogen/phosphorus pesticides. The number of samples needed depends on seasonal variation, range in the data results, and how close to the regulatory limit the analytical data is.**

**Ford, Kim**

---

**From:** Joyal, Francine  
**Sent:** Thursday, March 27, 2003 8:19 AM  
**To:** 'jesse white'  
**Cc:** Boroff, Suzanne; ESBC Solid Waste Jean Nutter; Project Manager Paul A. Wingler; Cory Jamieson; Ford, Kim; Pelz, Susan; Clark, Jan Rae  
**Subject:** RE: Sarasota Food Waste Composting Project

RE: Food Composting  
Permit - S...

RE: Sampling Plan  
Development

Jessie,

During our conversation yesterday, I mentioned that I did not intend to reply via email to your message below as I felt this had been addressed via telephone conversation and the email from the District. You requested an email reply for your records, so I'll reiterate much of what we discussed.

I previously forwarded the email you inquired about, but am attaching it to this email as well. Sample collection and analysis protocols need to comply with the requirements of Chapter 62-160, Florida Administrative Code. You can view this rule at: <http://www.dep.state.fl.us/legal/legaldocuments/rules/general/62-160.pdf>. You should also look at the information on Quality Assurance found at <http://www.dep.state.fl.us/labs/qa/index.htm>.

It was my understanding that what was to be discussed was the additional parameters (i.e., those not currently required by rule) that could help support future rule making efforts. Those would be the "recommended" parameters mentioned in the attached email. It was not intended that the project be required to test for all the "recommended" parameters. But it can certainly be discussed which (if not all) could be performed as part of this project. My email to Cory (attached) discussed how to determine the analytical methods that should be used. I do want to reiterate a point I made in the email to Cory. Specifically, this project is multi-pronged in that it needs to address site-specific District concerns while also obtaining data that may be useful in rule making. Discussions on the sampling plan should involve the District and me at the same time.

Francine Joyal  
Solid Waste Section, MS 4565  
Florida DEP  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Phone: 850/245-8747

-----Original Message-----

**From:** jesse white [mailto:[jesse.white@rmg.us](mailto:jesse.white@rmg.us)]  
**Sent:** Monday, March 10, 2003 5:52 PM  
**To:** Joyal, Francine  
**Cc:** Boroff, Suzanne; ESBC Solid Waste Jean Nutter; Project Manager Paul A. Wingler; Cory Jamieson  
**Subject:** Sarasota Food Waste COmposting Project

Francine,

As you are aware, we are eagerly awaiting a permit to begin the composting project. The latest delay is being caused by a request from Tampa District DEP for sampling protocol that we will follow to develop valid data for use by FDEP for rulemaking in the future. Agreed, this is the ultimate goal of the project as it now stands.

However, my understanding had been that this sampling protocol was to be created jointly by the affected parties, namely FDEP District, FDEP Tallahassee, and Sarasota County Government (and RMG) after a permit or notice to proceed had been granted by FDEP District.

Cory and I just got off the phone with Kim Ford, Tampa District DEP. He informs us that he believes that the sampling protocol is an integral part of his office's requirements. To this end, he referenced a sampling protocol for our project that you prepared for his review. Could you please forward to us a copy of the protocol? We have not received a copy.

We have also been preparing a sampling plan and have a draft that we had hoped to distribute to you and District for discussion purposes. Kim Ford has indicated that he is too busy to meet with us to discuss a sampling protocol. Furthermore, we do not want to operate at cross purposes with work you have already done. If you have a protocol that we can follow, that would be ideal.

We really need some leadership from FDEP at this point. From what Kim shared with us, I believe you are in an excellent position to provide this leadership. I hope that if you set a clear direction to District, stating the specific data sets and methods that will be of use to your department, that District will accept these. Then, the County and RMG will be able to implement a project that will provide valued data to you. If you are not the person to provide this push, please refer us to the proper person.

Please call me to discuss next steps.

jesse

Jesse White  
President  
Resource Management Group, Inc.  
1143 Central Ave  
Sarasota, FL 34236  
941-358-7730  
\*NEW\* 941-362-4290 FAX  
jesse@rmg.us  
-----

**Ford, Kim**

---

**From:** Joyal, Francine  
**Sent:** Wednesday, February 12, 2003 2:05 PM  
**To:** Ford, Kim  
**Cc:** Pelz, Susan; Clark, Jan Rae; Boroff, Suzanne; Tedder, Richard; McGuire, Chris  
**Subject:** RE: Food Composting Permit - Sarasota

Kim,

I believe the attached email is the one you could not find. I think it is important to distinguish those parameters a food waste composting operation must test for pursuant to rule requirements and those parameters that may provide information leading to future regulatory changes. The parameters that are not required at this time could support relaxing or increasing facility design and operation requirements, and permit renewal procedures.

Required testing:

Leachate parameters they should be required to test for pursuant to Rule 62-709.500(7) are the applicable standards of Chapters 62-25, 62-302 and 62-330, F.A.C.  
Compost product parameters are listed in Rules 62-709.530(1)(a) and (c).

Recommendations that would be OPTIONAL ONLY for those parameters that may provided information supporting future rule amendments:

Leachate parameters (additional pesticides may be identified at a later date):  
Arsenic (This is a surface and groundwater parameter. But if they are not discharging, and therefore not testing for, it should then be included in the optional parameters)  
Total Nitrogen  
Total Phosphorus  
DDT  
Chlorinated (includes DDT) and nitrogen/phosphorus pesticide scan.

Compost product parameters that should be included as recommendations for OPTIONAL ONLY testing (additional pesticides may be identified at a later date):  
Arsenic  
DDT  
Chlorinated (includes DDT) and nitrogen/phosphorus pesticide scan.

Francine



RE: Compost/  
Leachate Testing

-----Original Message-----

**From:** Ford, Kim  
**Sent:** Monday, February 10, 2003 3:00 PM  
**To:** Joyal, Francine  
**Cc:** Pelz, Susan  
**Subject:** Food Composting Permit - Sarasota

Francine :



I am drafting the permit for the food composting facility, you know the one with the grant, and would like your help in preparing conditions related to sampling. It seems like you and Susan may have already briefly discussed this but I cannot find the e-mail. I just want to be sure that what we ask for in the permit matches up with what we expect as part of the grant, and to make sure that we have what we need to make our final decision on allowing it in the future without a liner or not.

Thanks.

Kim

**Ford, Kim**

**From:** Joyal, Francine  
**Sent:** Wednesday, March 26, 2003 10:42 AM  
**To:** 'cory jamieson'  
**Cc:** Paul Wingler; Bob Sleep; Jean Nutter; Ford, Kim; Pelz, Susan; Boroff, Suzanne; Labie, Silky; Clark, Jan Rae  
**Subject:** RE: Sampling Plan Development

Cory,

Per our discussion yesterday, the required compliance sampling (Specific Condition 12a) in the permit is what must be tested for per Chapter 62-709, F.A.C.. The optional sampling is just that -- optional. As I read the draft permit conditions, Specific Condition 12.b lists the parameters that need to be sampled and analyzed for IF the permittee wishes to demonstrate that leachate meets the water quality standard. Results of such testing could provide the District information they need regarding what is required in facility designs to meet water quality standards. This project is multi-pronged in that it needs to address site-specific District concerns while also obtaining data that may be useful in rule making. Discussions on the sampling plan should involve the District and me at the same time. I would refer formatting questions to the District.

I have learnt that our Quality Assurance (QA) group periodically offers sampling training up here. I am not sure who the prime contact on such training is, but my QA contact is Silky Labie. You need to consider the best option for this project regarding who collects the samples. When you are looking at which laboratory to use for the analyses, you should ask if they can supply test kits (e.g., pre-cleaned bottles already containing the proper preservative). The DEP SOP document you are looking at contains the information you need, but you should determine which methods need to be used. Note that for the compost product itself, data on arsenic, chlorinated pesticides and phosphorus/nitrogen pesticides would be helpful for rule making. As I mentioned, the method for looking at chlorinated pesticides is 8081 and for phosphorus/nitrogen pesticides is 8141. The methods selected should have detection levels that are at least at or preferably below the parameter limit. Specific Condition 12.b lists the parameters, and the limits are contained in the water quality regulations. Note that for rule making purposes, I would be looking at Class I surface water quality requirements.

Francine Joyal  
Solid Waste Section, MS 4565  
Florida DEP  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Phone: 850/245-8747

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Monday, March 24, 2003 11:31 AM  
**To:** Paul Wingler; Bob Sleep; Joyal, Francine; Jean Nutter; Ford, Kim; Pelz, Susan; Boroff, Suzanne  
**Subject:** Sampling Plan Development

Dear Francine Joyal,

As you are aware, Sarasota County has received INTENT from FDEP District for the proposed composting facility. At this stage in the project we have begun the first steps of sampling plan development. We are attempting to get this plan finalized in an expedient manner so as to begin collections at the proposed facility as soon as possible.

The County and RMG would like some assistance from you in developing the sampling plan for the project. We would like to set up an open line of communication and begin a dialogue that will make this phase of the project as efficient as it can be. Would you like us to use a standardized format for submittal to the Department for review/approval, or would you rather we send you drafts of what we develop so you and your colleagues can make comments and suggestions as we proceed? There are still unanswered questions regarding this plan, for example the differences between required compliance sampling and optional sampling that addresses FDEP's concerns.

We are eager to get this project underway and your assistance with the sampling plan will help immensely to achieve this goal. I myself am working full time on this project and am available to aide you or other parties in any ways necessary to make the process go as smoothly as possible. I would like to hear from you today, or tomorrow, regarding this. If we don't hear from you we will continue developing the sampling plan to the best of our abilities. Thank you so much for your help thusfar and your continued assistance in the project's development. -Cory

Cory Jamieson  
Resource Management Group  
1143 Central Ave.  
Sarasota, FL 34236  
Ph:(941) 358-7730  
Fx: (941) 362-4290

**Ford, Kim**

**From:** cory jamieson [cory@rmg.us]  
**Sent:** Wednesday, March 26, 2003 12:26 PM  
**To:** Jesse White; Boroff, Suzanne; Pelz, Susan; Ford, Kim; Jean Nutter; Joyal, Francine; Bob Sleep; Paul  
**Subject:** Sarasota Composting - Sampling Plan Technical Advisory Committee

Dear Associates,

Sarasota County and RMG have been composing a sampling plan for the composting facility and would like to form a Technical Advisory Committee to continue developing it. Attached is a document prepared by RMG that outlines the goals of a sampling plan. Please review this document and submit your comments to me before 12:00 PM on Friday. Thank you for your help. -Cory

Cory Jamieson  
Resource Management Group  
1143 Central Ave.  
Sarasota, FL 34236  
Ph:(941) 358-7730  
Fx: (941) 362-4290

# **Sampling Plan Discussion Document**

Submitted to:  
Florida Department of Environmental Protection  
as a part of the Sarasota County  
Food Recovery and Recycling Project  
Innovative Recycling Grant Number IG1-14

## **Introduction**

The concept of a sampling plan that goes beyond compliance is an outgrowth of Sarasota County's desire to commercialize composting of food discards mixed with yard trimmings, after the pilot program being conducted in an active cell of the County's landfill. During the County's attempt to site a composting facility on a farm and, later, in an unlined section of the Central County Solid Waste Disposal Complex (landfill), barriers were encountered to facility permitting.

Sarasota's experience is that the current standards for construction and operation of a composting facility make costs too high to encourage this kind of waste reduction. If sampling can demonstrate that environmental risks are minimized, it is hoped that FDEP and the legislature will consider writing exceptions into the Solid Waste and Compost Rules, to allow limited food waste composting when conducted using certain best management practices.

Following is a discussion of the three issues in this project which have the highest capital and operational costs. Please review these issues, and work with us to develop a sampling plan that will develop data to evaluate the validity of changing the way Florida regulates food residuals composting operations.

## **ISSUE 1: Feedstock Receiving Pad**

### *Description of Process*

On the Feedstock Receiving Pad, food residuals are received, inspected for unpermitted materials removal, size reduced, and mixed with bulking agent. During this process, leachate may be generated. If rain occurs, leachate may be produced from this operation.

### *Current Rule Requirements*

Current rules require that any liquid produced on this pad must be managed as leachate, whether or not food discards are present.

### *Impact of Current Rules*

Leachate management requires either continuous pumping into an approved leachate management system, e.g., sanitary sewer or placement in a double walled storage tank. Both of these options are prohibitively expensive for a farmer or small scale commercial composting operation to implement.

### *Preferred Alternative*

- No requirement for continuous feed of leachate into treatment system.
- No requirement for double lined storage tanks.
- Exemption from the "tank rule."
- Storage tank for leachate generated on pad sized to accommodate leachate generated during compost receipt and processing, plus \_\_\_ inches of rain, based on the average 1 hour rainfall in a summer storm.
- Rain on pad when waste is not being received can be sent to stormwater treatment system, but not handled as leachate.

### *Sampling Plan Impact*

Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?

## **ISSUE 2: Composting Pad Requirements**

### *Description of Process*

The Ag-Bag System is an invessel composting system, which contains the food discards and bulking agent for the first 3-6 months of the composting process. Ag-Bag can operate on virtually any surface. At the conclusion of the Ag-Bag composting phase, the bags are opened and the compost removed for curing, the final composting phase. District has raised concerns that during harvest, compost may fall on the pad, or be left in the Ag-Bag footprint, and that this compost is defined as "solid waste" until fully matured.

### *Current Rule Requirements*

It is not entirely clear what surface is required for the placement of the Ag Bag. However, to completely remove all compost during the harvest phase would require the construction of a concrete or asphalt operating pad. Additionally, if compost is not completely removed from the operating pad, stormwater generated on this pad might be required to be managed as leachate.

### *Impact of Current Rules*

Constructing a concrete, asphalt, or even soil-cement composting pad is cost prohibitive.

### *Preferred Alternative*

- Permit Ag-Bag composting on native soils with no pad construction requirements.
- Permit harvesting to result in <3% residual on the operating pad.
- No requirement to handle stormwater generated on this pad to be managed as leachate.

### *Sampling Plan Impact*

Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?



### **ISSUE 3: Curing Pad Requirements**

#### *Description of Process*

The final phase of the composting process is “curing” which occurs in static piles created when the Ag-Bags are harvested. This material is “immature” compost, which has many uses and many limitations from a product marketing and liability standpoint.

#### *Current Rule Requirements*

Compost in the curing phase is still considered solid-waste. The Compost Rule requires compost to comply with several parameters before it can be considered mature.

#### *Impact of Current Rules*

Liquid generated from the compost and stormwater produced on the curing pad is considered to be leachate, requiring the management strategies described above in “Issue 1.” Typically, a concrete or other impermeable pad is required for storage of compost during the curing phase.

#### *Preferred Alternative*

- No impermeability requirements for curing pad.
- Leachate control requirements replaced with best management practices for curing compost that demonstrates no analytes of concern (metals).
- Best management practices to handle any potential nutrient issues.

#### *Sampling Plan Impact*

Given the preferred alternatives, what sampling and analysis would provide information to evaluate the validity of these proposals?



For, Kim

**From:** Joyal, Francine  
**Sent:** Wednesday, March 26, 2003 10:42 AM  
**To:** 'cory jamieson'  
**Cc:** Paul Wingler; Bob Sleep; Jean Nutter; Ford, Kim; Pelz, Susan; Boroff, Suzanne; Labie, Silky; Clark, Jan Rae  
**Subject:** RE: Sampling Plan Development

Cory,

Per our discussion yesterday, the required compliance sampling (Specific Condition 12a) in the permit is what must be tested for per Chapter 62-709, F.A.C.. The optional sampling is just that -- optional. As I read the draft permit conditions, Specific Condition 12.b lists the parameters that need to be sampled and analyzed for **IF** the permittee wishes to demonstrate that leachate meets the water quality standard. Results of such testing could provide the District information they need regarding what is required in facility designs to meet water quality standards. This project is multi-pronged in that it needs to address site-specific District concerns while also obtaining data that may be useful in rule making. Discussions on the sampling plan should involve the District and me at the same time. I would refer formatting questions to the District.

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Francine Joyal  
Solid Waste Section, MS 4565  
Florida DEP  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Phone: 850/245-8747

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Monday, March 24, 2003 11:31 AM  
**To:** Paul Wingler; Bob Sleep; Joyal, Francine; Jean Nutter; Ford, Kim; Pelz, Susan; Boroff, Suzanne  
**Subject:** Sampling Plan Development

Dear Francine Joyal,

As you are aware, Sarasota County has received INTENT from FDEP District for the proposed composting facility. At this stage in the project we have begun the first steps of sampling plan development. We are attempting to get this plan finalized in an expedient manner so as to begin collections at the proposed facility as soon as possible.

The County and RMG would like some assistance from you in developing the sampling plan for the project. We would like to set up an open line of communication and begin a dialogue that will make this phase of the project as efficient as it can be. Would you like us to use a standardized format for submittal to the Department for review/approval, or would you rather we send you drafts of what we develop so you and your colleagues can make comments and suggestions as we proceed? There are still unanswered questions regarding this plan, for example the differences between required compliance sampling and optional sampling that addresses FDEP's concerns.

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• Cory Jamieson  
Resource Management Group  
1143 Central Ave.  
Sarasota, FL 34236  
Ph:(941) 358-7730  
Fx: (941) 362-4290

**Ford, Kim**

**From:** cory jamieson [cory@rmg.us]  
**Sent:** Monday, March 24, 2003 11:31 AM  
**To:** Paul Wingler; Bob Sleep; Joyal, Francine; Jean Nutter; Ford, Kim; Pelz, Susan; Boroff, Suzanne  
**Subject:** Sampling Plan Development

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1143 Central Ave.  
Sarasota, FL 34236  
Ph: (941) 358-7730  
Fx: (941) 362-4290

3/24/03



**Ford, Kim**

**From:** Boroff, Suzanne  
**Sent:** Friday, March 21, 2003 3:59 PM  
**To:** 'cory jamieson'  
**Cc:** Sleep, Bob; Nutter, Jean; Joyal, Francine; pwingler@co.sarasota.fl.us; Ford, Kim; White, Jesse  
**Subject:** RE: Food Composting - Intent to Issue

Good news and job well done!

-----Original Message-----

**From:** cory jamieson [mailto:cory@rmg.us]  
**Sent:** Friday, March 21, 2003 3:52 PM  
**To:** Boroff, Suzanne  
**Cc:** Sleep, Bob; Nutter, Jean; Joyal, Francine; pwingler@co.sarasota.fl.us; Ford, Kim; White, Jesse  
**Subject:** Food Composting - Intent to Issue

Dear Suzanne,

District DEP is out of town in Orlando at a training seminar for the week, so we've been unable to contact either Kim Ford, or his supervisor Susan Pelz. Despite this setback, District did issue INTENT yesterday (Thursday, 3/20) but did not inform either RMG or the County, though involved parties should receive copies in the mail next week.

I am working with the county to get a notice posted in the Sarasota Herald-Tribune as soon as possible and once that has occurred we can begin the fourteen day waiting period. During this time we will do as much as possible to prepare for the permit's issuance and once it is in hand we should be able to move quickly and efficiently.

We've tentatively planned for about a month to prepare the site and organize collections. The two-week waiting period gives us some breathing room and time to coordinate with DEP about the sampling plan. All told this puts us around the first week of May to begin collections at the site and start filling Ag-Bags.

Thanks Suzanne, we'll keep you informed of developments as they occur.

Cory Jamieson  
Resource Management Group  
1143 Central Ave.  
Sarasota, FL 34236  
Ph:(941) 358-7730  
Fx: (941) 362-4290

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

P.1

Mar 21 2003 11:42

Telephone Number	Mode	Start	Time	Pages	Result	Note
819413624290	NORMAL	21,11:28	13'56"	23	O K	

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

3804 Coconut Palm Drive  
Tampa, FL 33619-8318

**FAX**Date: 3-21-03Number of pages including cover sheet: 23

To:

Cory Jamison  
Resource Mgmt Group

Phone:

Fax phone: 941-362-4290

CC:

From:

Anna

Phone: (813) 744-6100

Fax phone: (813) 744-6125

REMARKS:

☐ Urgent☐ For your review☐ Reply ASAP☐ Please comment

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

3804 Coconut Palm Drive  
Tampa, FL 33619-8318

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Date: 3-21-03  
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Fax phone: 941-362-4290

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Phone: (813) 744-6100

Fax phone: (813) 744-6125

REMARKS:

☐ Urgent

☐ For your review

☐ Reply ASAP

☐ Please comment

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL 7001 1940 0001 7487 9291  
RETURN RECEIPT REQUESTED

March 20, 2003

In the matter of an  
Application for Permit by:

Permit No.: 200819-001-SO  
Sarasota County

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 knights Trail Road  
Nokomis, FL 34275

---

INTENT TO ISSUE

The Department of Environmental Protection gives notice of its Intent to Issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Sarasota County, c/o Mr. Gary Bennett, applied on June 17, 2002 to the Department of Environmental Protection for a permit to operate a composting facility (approximately 1/2 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida.

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

The Department intends to issue this permit based on its belief that reasonable assurances have been provided to indicate that the

proposed project will not adversely impact water quality and the proposed project will comply with appropriate provisions of Chapters 62-4 and 62-701, F.A.C., subject to the specific conditions attached in the permit.

Pursuant to Section 403.815, Florida Statutes and Chapters 62-110 and 28-106, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on Permit Application. The notice must be published one time only within thirty (30) days of receipt of this intent in the legal ad section of a newspaper of general circulation in the area affected. Proof of publication must be provided to the Department within seven (7) days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit. The Department will issue the permit with the attached conditions unless petition for administrative proceeding (hearing) is filed pursuant to the provisions of Sections 120.569 and 120.57, Florida Statutes.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any other person must be filed within fourteen days of publication of the public notice or within fourteen days of receipt



of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the discretion of the presiding officer upon the filing of a motion in compliance with rule 28-5.207 of the Florida Administrative Code.

A petition must 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 the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

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

In addition to requesting an administrative hearing, any person may elect to pursue mediation by reaching a mediation agreement with all parties to the proceeding (which include the applicant, the Department, and any person who has filed a timely and sufficient petition for a hearing) and by showing how the substantial interests of each mediating party are affected by the Department's action or proposed action. The agreement, in accordance with Rule 28-106.404, must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement.

The agreement to mediate must include the following:

- (a) The names, addresses, and telephone numbers of any persons who may attend the mediation;
- (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;
- (c) The agreed allocation of the costs and fees associated with the mediation;
- (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

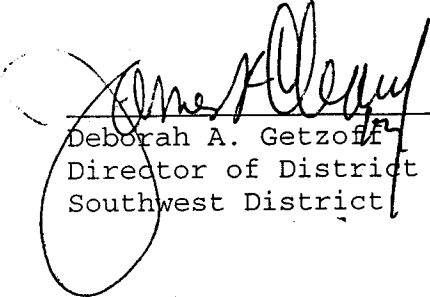
- (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;
- (f) The name of each party's representative who shall have authority to settle or recommend settlement; and
- (g) Either an explanation of how the substantial interests of each mediating party will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that each party has already filed, and incorporating it by reference.
- (h) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 for requesting and holding an administrative hearing and issuing a final order. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above, and must therefore file their petitions within fourteen days of receipt of this notice of intent. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections

120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
Deborah A. Getzoff  
Director of District Management  
Southwest District

DAG/kbfb  
Attachment

Copies furnished to:

Elected Officials Notification  
Jesse White, Resource Management Group  
Paul Wingler, P.E., Sarasota County  
Susan Pelz, P.E., FDEP Tampa  
Francine Joyal, FDEP Tallahassee  
Douglas Beason, OGC Tallahassee

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this **NOTICE OF INTENT TO ISSUE** and all copies were mailed before the close of business on MARCH 20, 2003 to the listed persons.  
Clerk Stamp

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

Anna Blade  
(Clerk)

03/20/2003  
(Date)

**State of Florida**  
**Department of Environmental Protection**  
**Notice of Proposed Agency Action on Permit Application**

The Department gives notice of its intent to issue a permit (File No. 200819-001-SO) to Sarasota County, c/o Mr. Gary Bennett, 4000 Knights Trail Road, Nokomis, Florida, 34275, who applied on June 17, 2002 to the Department of Environmental Protection for a permit to operate a composting facility (approximately ½ acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below, and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within fourteen (14) days of publication of this notice. A copy of the petition must also be mailed at the time of filing to the applicant at the address indicated. Failure to file a request for hearing within this time period shall constitute a waiver any right such person may have to request an administrative determination (hearing) under 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 warrant reversal or modification of the Department's action or proposed action; and (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by 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, Florida Statutes, 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, Florida Administrative Code.

The application 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 3804 Coconut Palm Drive, Tampa, Florida 33619-8318.



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

## PERMITTEE

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 Knights Trail Road  
Nokomis, FL 34275

## PERMIT/CERTIFICATION

WACS Facility ID No: SWD/58/51614  
Permit No: 200819-001-SO  
Date of Issue:  
Expiration Date:  
County: Sarasota  
Lat/Long: 27° 12' 09"N  
82° 23' 15"W  
Sec/Town/Rge: 1-4, 9-16/38S/19E  
Project: Food Composting  
Facility Operation - CCSWDC

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This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-522, 62-550, 62-701, and 62-709. 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 composting facility (approximately 1/2 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida. The specific conditions attached are for the operation of a:

1. Food Composting Facility

**Replaces Permit No.: N/A, new**

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.

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**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.



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**GENERAL CONDITIONS:**

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;
- (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.

GENERAL CONDITIONS:

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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.
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.

PERMITTEE: Sarasota County  
Mr. Gary Bennett

MIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

DRAFT

**GENERAL CONDITIONS:**

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.

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**SPECIFIC CONDITIONS:**

1. **Facility Designation.** This site shall be classified as a yard trash mulch and food waste composting facility and shall be operated in accordance with all applicable requirements of Chapters 62-4, 62-330, 62-522, 62-550, 62-701 and 62-709 Florida Administrative Code (F.A.C.) and all applicable requirements of Department Rules. This permit does not relieve the permittee's responsibility to comply with all applicable state, federal and local regulations which may govern this operation.

2. **Permit Application Documentation.** This permit authorizes the operation of the temporary composting facility in accordance with the reports, plans and other information as follows:

a. Application to Operate the Food Composting Facility, with related documents, received June 17, 2002;

b. Response letter by Sarasota County dated January 13, 2003 received on January 17, 2003;

c. Supplemental response letter and drawings (including the Yard Plan - Page No. 3) by Sarasota County dated February 4, 2003, received on February 5, 2003;

and in accordance with all applicable requirements of Department rules.

3. **Permit Modifications.** Any activities 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 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 **ninety (90) 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 (if necessary to continue operation beyond the expiration date), in order to assure conformance with all applicable Department rules.

5. **Prohibitions.** The prohibitions of Rule 62-701.300, F.A.C., shall not be violated.

6. **Facility Operation Requirements.**

a. The permittee shall operate this facility in accordance with the information referenced in Specific Condition #2, above, and applicable Department rules.

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### SPECIFIC CONDITIONS:

- b. The facility site shall be constructed and operated to prevent ponding of water.
  - c. Measures shall be taken to avoid mixing unprocessed materials with finished compost.
  - d. Adequate equipment and reserve equipment shall be available for managing the material. In the event that equipment becomes inoperable, reserve equipment shall be operating at the site **within 24 hours** of equipment breakdown.
  - e. Litter shall be collected daily on operating days.
  - f. The facility shall have an all-weather access road, and shall maintain adequate access to the receiving, processing and storage areas at all times.
7. **Operation Plan and Operating Record.**
- a. Each facility owner or operator shall have an operational plan. 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 inspections.
  - b. **Annually, no later than June 1st each year**, the permittee shall either submit an updated Operations Plan which includes any revisions or modifications to the facility design or operations, or in the event that no changes have occurred, the permittee shall notify the Department that the facility design and operations have not changed from the permitted activity.
8. **Control of Access.** Access to, and use of, the facility shall be controlled as required by Rule 62-709.500(4)(b), F.A.C.
9. **Monitoring of Waste.**
- a. This permit authorizes the acceptance, processing and management of yard trash mulch and food waste only (including biodegradable materials associated with food waste).
  - b. Wastes shall be monitored as required by Rule 62-709.500(5)(c), F.A.C. Sufficient operating personnel shall be at the facility at all times when waste is received or processed. Incoming wastes shall be inspected for unacceptable wastes immediately after being received. Unacceptable wastes shall be removed immediately from incoming loads.
  - c. The permittee, owner or operator shall not accept mulch from painted or treated (e.g. pentachlorophenol, creosote, or CCA treated) wood for processing or storage at this facility.

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**SPECIFIC CONDITIONS:**

d. The permittee shall not accept hazardous waste or any hazardous substance at this site. Hazardous waste is a waste in Chapter 62-730, F.A.C. Hazardous substances are those defined in Section 403.703, Florida Statute or in any other applicable state or federal law or administrative rule.

**10. Waste Handling Requirements.**

a. The composting facility shall be operated so as to handle solid wastes on first-in, first-out basis.

b. Food waste shall be processed **daily** on operating days or removed for off-site disposal **within 24 hours** of receipt at the composting facility.

c. Material which has completed the composting process shall be removed from the site within three months.

d. In the event that the storage capacity has been reached, no additional material shall be accepted at the facility until sufficient storage and/or processing capacity has been restored.

**11. Material Storage Requirements.**

a. The storage capacity of this facility is limited to 580 cubic yards total of in-process material, finished compost, or a combination thereof (i.e. 4-Ag Bags rows). The compost windrows shall be formed and managed in accordance with the layout shown on the Yard Plan (attached).

b. Storage of yard trash mulch and unprocessed food wastes is limited to the "receiving pad" as shown on the Yard Plan.

c. Yard trash mulch which will not be made into compost or processed into other usable material shall be removed at least **monthly**.

d. All solid waste (yard trash mulch, food waste, or compost) received, processed or stored at the composting facility shall be stored, processed and managed in a manner so as not to constitute a fire or safety hazard or a sanitary nuisance. Likewise, these materials shall be stored, processed and managed such that odors and vectors are minimized.

e. Plastic bags and solid waste other than the authorized materials for the facility, shall be separated and stored in a manner that prevents odor and vector problems and shall be removed **within 24 hours** of receipt. If odors are determined to be a nuisance at the site boundaries, or if rainfall damages the final curing piles, odor controls or waterproof covers may be required.

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SPECIFIC CONDITIONS:

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12. Sampling and Quality Assurance.

a. Sampling and analysis of the finished compost shall be in accordance with Rule 62-709.530(1)(a) and (c), F.A.C.

b. Leachate Sampling and Analysis. In the event that the permittee wishes to demonstrate that the leachate produced by the facility operation meets Department water quality standards, then the leachate must be sampled and analyzed for the following parameters:

Water quality parameters listed in 62-701.510(8)(a) and (b), and chlorinated and nitrogen/phosphorus pesticide scan.

1) The demonstration must include a statistically significant number of samples equally distributed throughout the demonstration period.

2) Method Detection Limits must be less than or equal to the Maximum Contaminant Levels established for the individual parameters.

3) All field work done in connection with the facility's Sampling and Analysis Plan shall follow all applicable procedures described in DEP SOP-0001/01 (January 2002). All laboratory analyses done in connection with the facility's Sampling and Analysis Plan shall be conducted by firms that are certified by the Department of Health Environmental Laboratory Certification Program in accordance with the schedule referenced in Chapter 62-160, F.A.C. The SOPs utilized and the laboratory's list of certified test methods and analytes must be specifically address the types of sampling and analytical work that are required by the permit and shall be implemented by all persons performing sample collection or analysis related to this permit.

4) The field testing, sample collection, sample preservation and laboratory testing, including the collection of quality control samples, shall be in accordance with the requirements of and methods approved by the Department in accordance with Rule 62-4.246 and Chapter 62-160, F.A.C. Approved methods published by the Department, or as published in Standard Methods or by A.S.T.M., or EPA methods shall be used. Alternate field procedures and laboratory methods may be used if they have been approved according to the requirements of Rule 62-160.220 and 62-160.330, F.A.C.

c. The Department may decrease or increase the parameters to be analyzed for or the frequency of analysis based on monitoring data, changes in the waste stream or processing, or the potential presence of toxic substances.

d. Annually by June 1<sup>st</sup>, and upon completion of the project, a project report shall be provided with all compost and leachate analytical data, with conclusions and recommendations, signed and sealed by a professional engineer.

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### SPECIFIC CONDITIONS:

13. **Recordkeeping.** Records shall be maintained as required by Rule 62-709.530, F.A.C.

a. **Annually, no later than June 1st each year,** the owner or operator shall submit an annual report to the Department in accordance with Rule 62-709.530(3), F.A.C.

b. The permittee shall record and maintain for three years the information required by Rule 62-709.530(2), F.A.C. The permittee shall compile this information monthly, and shall submit a summary **quarterly, by March 1st, June 1st, September 1st and December 1st each year.** Records shall be available for inspection by Department personnel during normal business hours and shall be sent to the Department upon request.

14. **Stormwater System Management.** Stormwater shall be managed to meet applicable standards of Chapters 62-3, 62-302, and 62-330, F.A.C. The facility shall have a surface water management system operated and maintained to prevent surface water flow onto composting areas, and a stormwater runoff control system operated and maintained to collect and control stormwater to meet requirements of Florida Administrative Code 62-330 and requirements of the respective water management district.

15. **Waste Burning.** Open burning of solid waste is prohibited except in accordance with Rules 62-701.300(3) and 62-256, F.A.C. Controlled burning of solid waste is prohibited at this site except for clean vegetative and wood wastes which may be burned in a permitted air curtain incinerator in accordance with Rule 62-296.401, F.A.C. Any accidental fires which require longer than **one (1) hour** to extinguish must be promptly reported to the Department.

16. **Fire Safety Survey.**

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 1st** 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.

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**SPECIFIC CONDITIONS:**

**17. Control of Nuisance Conditions.**

a. The operating authority shall be responsible for the control of odors and fugitive particulates 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 mosquitoes and rodents or request such control measures from the local mosquito control office, as so to protect the public health and welfare.

b. Odor Control. The owner or operator shall inspect the facility boundaries at least **daily** for the presence of odor. In the event that odors are detected, the owner or operator shall **immediately (within 24 hours)** implement corrective actions to abate the odor. If the corrective measures do not sufficiently control the odor, the Department shall be notified in accordance with Specific Condition #18, and a plan for additional corrective measures shall be submitted. In the event that odor complaints are received from adjacent property owners/operators, the facility shall cease accepting material until the odors have been adequately controlled.

**18. Facility Maintenance and Repair.** The site shall be properly maintained including grading, prevention of ponding, and maintenance of composting subgrades and equipment. In the event of damage to any portion of the site facilities, failure of any portion of the facility systems, or in the event of a fire, the permittee shall **immediately (within 24 hours)** notify the Department of Environmental Protection explaining such occurrence, method to prevent reoccurrence, and remedial measures to be taken and time needed for repairs. Written detailed notification shall be submitted to the Department **within seven (7) days** following the occurrence.

**19. 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.

**20. 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.

**21. 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.

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**SPECIFIC CONDITIONS:**

22. **Regulations.** The requirements of Chapter 62-709, F.A.C., effective October 22, 2000, are incorporated into this permit by reference. In the event that the regulations governing this permitted operation are revised, the Department shall notify the permittee, and the permittee shall request modification of those specific conditions which are affected by the revision of regulations to incorporate those revisions.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

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Deborah A. Getzoff  
Director of District Management  
Southwest District

ATTACHMENT 1

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SPECIFIC CONDITION	SUBMITTAL DUE DATE	REQUIRED ITEM
4.	180 days prior to permit expiration	Permit Renewal Application or extend the expiration date
7.b.	Annually, by June 1st	Submit updated Operations Plan
12.d.	Annually, by June 1st	Submit Project Report
13.a.	Annually, by June 1st	Submit Annual Report
13.b.	Quarterly, by March 1st, June 1st, September 1st, and December 1st	Waste quantity reports, compost production report, compost analysis
18.	Within 24 hours of occurrence	Notify FDEP of system failure
18.	Within 7 days of occurrence	Written notification of system failure, and schedule for repair

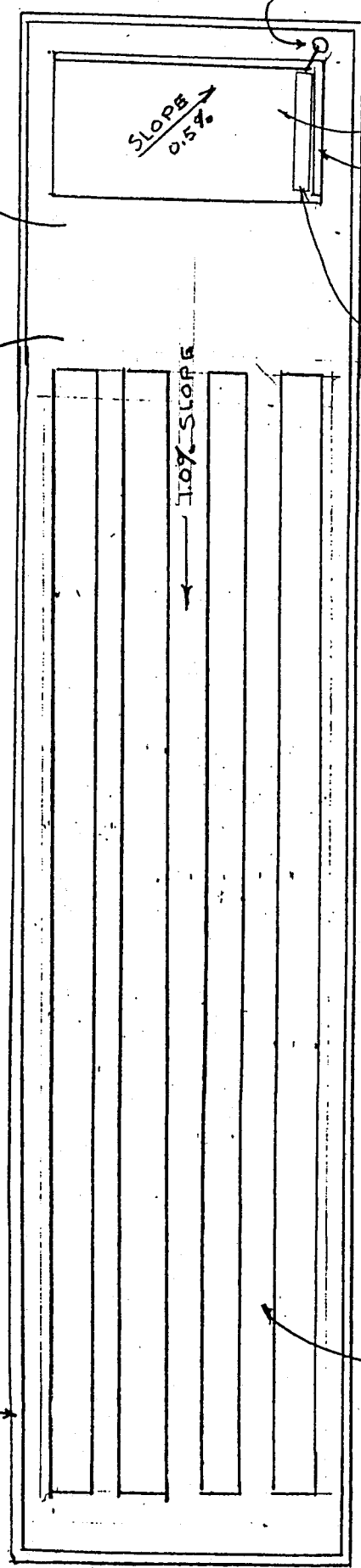
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1" = 30'  
N

ACCESS RAMP

EARTH BERM

275'



SLOPE  
0.5%

SAMPLE  
BUCKET

24" x 24"  
PUSH STOP

25' x 50' CONC  
RECEIVING PAD  
9" SAMPLE COLLECTION  
CURB

AG BAG AREA

(4) BAGS 5' DIA (4 1/4' x 1 1/4')

25' x 50' x 6" CONC PAD  
ON 8" NO 57 CONC.

6" MULCH FILL

TRENCH DRAIN  
3' x 3' x 50' NO 57  
CONC. W/ GEO COVER

18" INTERMEDIATE  
COVER

TRENCH DRAIN  
(TYP)

PROFILE (NTE)

YARD PLAN

FOOD COMPOSTING FACILITY

DEC 2002 D.P.A. WINGLER, P.E.  
REV 2-3-03

PAWML  
7/4/03

PAGE NO. 3

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL 7001 1940 0001 7487 9291  
RETURN RECEIPT REQUESTED

March 20, 2003

In the matter of an  
Application for Permit by:

Permit No.: 200819-001-SO  
Sarasota County

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 knights Trail Road  
Nokomis, FL 34275

INTENT TO ISSUE

The Department of Environmental Protection gives notice of its Intent to Issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Sarasota County, c/o Mr. Gary Bennett, applied on June 17, 2002 to the Department of Environmental Protection for a permit to operate a composting facility (approximately 1/2 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida.

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

The Department intends to issue this permit based on its belief that reasonable assurances have been provided to indicate that the

proposed project will not adversely impact water quality and the proposed project will comply with appropriate provisions of Chapters 62-4 and 62-701, F.A.C., subject to the specific conditions attached in the permit.

Pursuant to Section 403.815, Florida Statutes and Chapters 62-110 and 28-106, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on Permit Application. The notice must be published one time only within thirty (30) days of receipt of this intent in the legal ad section of a newspaper of general circulation in the area affected. Proof of publication must be provided to the Department within seven (7) days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit. The Department will issue the permit with the attached conditions unless petition for administrative proceeding (hearing) is filed pursuant to the provisions of Sections 120.569 and 120.57, Florida Statutes.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any other person must be filed within fourteen days of publication of the public notice or within fourteen days of receipt

of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the discretion of the presiding officer upon the filing of a motion in compliance with rule 28-5.207 of the Florida Administrative Code.

A petition must 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 the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

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

In addition to requesting an administrative hearing, any person may elect to pursue mediation by reaching a mediation agreement with all parties to the proceeding (which include the applicant, the Department, and any person who has filed a timely and sufficient petition for a hearing) and by showing how the substantial interests of each mediating party are affected by the Department's action or proposed action. The agreement, in accordance with Rule 28-106.404, must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement.

The agreement to mediate must include the following:

- (a) The names, addresses, and telephone numbers of any persons who may attend the mediation;
- (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;
- (c) The agreed allocation of the costs and fees associated with the mediation;
- (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;



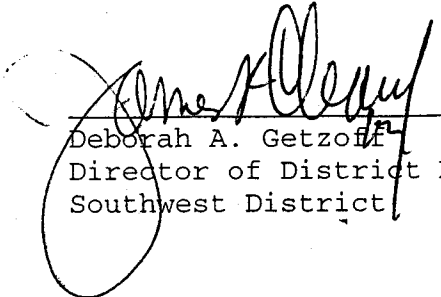
- (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;
- (f) The name of each party's representative who shall have authority to settle or recommend settlement; and
- (g) Either an explanation of how the substantial interests of each mediating party will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that each party has already filed, and incorporating it by reference.
- (h) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 for requesting and holding an administrative hearing and issuing a final order. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above, and must therefore file their petitions within fourteen days of receipt of this notice of intent. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections

120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



Deborah A. Getzoff  
Director of District Management  
Southwest District

DAG/kbfb  
Attachment

Copies furnished to:

Elected Officials Notification  
Jesse White, Resource Management Group  
Paul Wingler, P.E., Sarasota County  
Susan Pelz, P.E., FDEP Tampa  
Francine Joyal, FDEP Tallahassee  
Douglas Beason, OGC Tallahassee

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this **NOTICE OF INTENT TO ISSUE** and all copies were mailed before the close of business on MARCH 20, 2003 to the listed persons.

Clerk Stamp

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

Anna Bladt  
(Clerk)

03/20/2003  
(Date)

**State of Florida**  
**Department of Environmental Protection**  
**Notice of Proposed Agency Action on Permit Application**

The Department gives notice of its intent to issue a permit (File No. 200819-001-SO) to Sarasota County, c/o Mr. Gary Bennett, 4000 Knights Trail Road, Nokomis, Florida, 34275, who applied on June 17, 2002 to the Department of Environmental Protection for a permit to operate a composting facility (approximately ½ acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida.

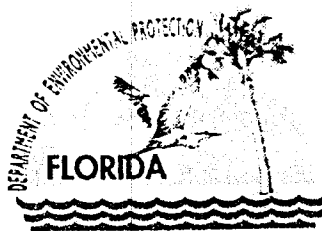
Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below, and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within fourteen (14) days of publication of this notice. A copy of the petition must also be mailed at the time of filing to the applicant at the address indicated. Failure to file a request for hearing within this time period shall constitute a waiver any right such person may have to request an administrative determination (hearing) under 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 warrant reversal or modification of the Department's action or proposed action; and (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by 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, Florida Statutes, 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, Florida Administrative Code.

The application 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 3804 Coconut Palm Drive, Tampa, Florida 33619-8318.



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

## PERMITTEE

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 Knights Trail Road  
Nokomis, FL 34275

## PERMIT/CERTIFICATION

WACS Facility ID No: SWD/58/51614  
Permit No: 200819-001-SO  
Date of Issue:  
Expiration Date:  
County: Sarasota  
Lat/Long: 27° 12' 09"N  
82° 23' 15"W  
Sec/Town/Rge: 1-4, 9-16/38S/19E  
Project: Food Composting  
Facility Operation - CCSWDC

**DRAFT**

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-522, 62-550, 62-701, and 62-709. 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 composting facility (approximately 1/2 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida. The specific conditions attached are for the operation of a:

1. Food Composting Facility

Replaces Permit No.: N/A, new

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.

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SECRET

**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.

GENERAL CONDITIONS:

**DRAFT**

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;
- (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.

GENERAL CONDITIONS:

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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.
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.



PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

DRAFT

**GENERAL CONDITIONS:**

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.

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**SPECIFIC CONDITIONS:**

1. **Facility Designation.** This site shall be classified as a yard trash mulch and food waste composting facility and shall be operated in accordance with all applicable requirements of Chapters 62-4, 62-330, 62-522, 62-550, 62-701 and 62-709 Florida Administrative Code (F.A.C.) and all applicable requirements of Department Rules. This permit does not relieve the permittee's responsibility to comply with all applicable state, federal and local regulations which may govern this operation.
2. **Permit Application Documentation.** This permit authorizes the operation of the temporary composting facility in accordance with the reports, plans and other information as follows:
  - a. Application to Operate the Food Composting Facility, with related documents, received June 17, 2002;
  - b. Response letter by Sarasota County dated January 13, 2003 received on January 17, 2003;
  - c. Supplemental response letter and drawings (including the Yard Plan - Page No. 3) by Sarasota County dated February 4, 2003, received on February 5, 2003;and in accordance with all applicable requirements of Department rules.
3. **Permit Modifications.** Any activities 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 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 **ninety (90) 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 (if necessary to continue operation beyond the expiration date), in order to assure conformance with all applicable Department rules.
5. **Prohibitions.** The prohibitions of Rule 62-701.300, F.A.C., shall not be violated.
6. **Facility Operation Requirements.**
  - a. The permittee shall operate this facility in accordance with the information referenced in Specific Condition #2, above, and applicable Department rules.

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### SPECIFIC CONDITIONS:

- b. The facility site shall be constructed and operated to prevent ponding of water.
  - c. Measures shall be taken to avoid mixing unprocessed materials with finished compost.
  - d. Adequate equipment and reserve equipment shall be available for managing the material. In the event that equipment becomes inoperable, reserve equipment shall be operating at the site **within 24 hours** of equipment breakdown.
  - e. Litter shall be collected daily on operating days.
  - f. The facility shall have an all-weather access road, and shall maintain adequate access to the receiving, processing and storage areas at all times.
7. **Operation Plan and Operating Record.**
- a. Each facility owner or operator shall have an operational plan. 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 inspections.
  - b. **Annually, no later than June 1st each year,** the permittee shall either submit an updated Operations Plan which includes any revisions or modifications to the facility design or operations, or in the event that no changes have occurred, the permittee shall notify the Department that the facility design and operations have not changed from the permitted activity.
8. **Control of Access.** Access to, and use of, the facility shall be controlled as required by Rule 62-709.500(4)(b), F.A.C.
9. **Monitoring of Waste.**
- a. This permit authorizes the acceptance, processing and management of yard trash mulch and food waste only (including biodegradable materials associated with food waste).
  - b. Wastes shall be monitored as required by Rule 62-709.500(5)(c), F.A.C. Sufficient operating personnel shall be at the facility at all times when waste is received or processed. Incoming wastes shall be inspected for unacceptable wastes immediately after being received. Unacceptable wastes shall be removed immediately from incoming loads.
  - c. The permittee, owner or operator shall not accept mulch from painted or treated (e.g. pentachlorophenol, creosote, or CCA treated) wood for processing or storage at this facility.

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### SPECIFIC CONDITIONS:

d. The permittee shall not accept hazardous waste or any hazardous substance at this site. Hazardous waste is a waste in Chapter 62-730, F.A.C. Hazardous substances are those defined in Section 403.703, Florida Statute or in any other applicable state or federal law or administrative rule.

#### 10. Waste Handling Requirements.

a. The composting facility shall be operated so as to handle solid wastes on first-in, first-out basis.

b. Food waste shall be processed **daily** on operating days or removed for off-site disposal **within 24 hours** of receipt at the composting facility.

c. Material which has completed the composting process shall be removed from the site within three months.

d. In the event that the storage capacity has been reached, no additional material shall be accepted at the facility until sufficient storage and/or processing capacity has been restored.

#### 11. Material Storage Requirements.

a. The storage capacity of this facility is limited to 580 cubic yards total of in-process material, finished compost, or a combination thereof (i.e. 4-Ag Bags rows). The compost windrows shall be formed and managed in accordance with the layout shown on the Yard Plan (attached).

b. Storage of yard trash mulch and unprocessed food wastes is limited to the "receiving pad" as shown on the Yard Plan.

c. Yard trash mulch which will not be made into compost or processed into other usable material shall be removed at least **monthly**.

d. All solid waste (yard trash mulch, food waste, or compost) received, processed or stored at the composting facility shall be stored, processed and managed in a manner so as not to constitute a fire or safety hazard or a sanitary nuisance. Likewise, these materials shall be stored, processed and managed such that odors and vectors are minimized.

e. Plastic bags and solid waste other than the authorized materials for the facility, shall be separated and stored in a manner that prevents odor and vector problems and shall be removed **within 24 hours** of receipt. If odors are determined to be a nuisance at the site boundaries, or if rainfall damages the final curing piles, odor controls or waterproof covers may be required.

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SPECIFIC CONDITIONS:

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12. Sampling and Quality Assurance.

a. Sampling and analysis of the finished compost shall be in accordance with Rule 62-709.530(1)(a) and (c), F.A.C.

b. Leachate Sampling and Analysis. In the event that the permittee wishes to demonstrate that the leachate produced by the facility operation meets Department water quality standards, then the leachate must be sampled and analyzed for the following parameters:

Water quality parameters listed in 62-701.510(8)(a) and (b), and chlorinated and nitrogen/phosphorus pesticide scan.

1) The demonstration must include a statistically significant number of samples equally distributed throughout the demonstration period.

2) Method Detection Limits must be less than or equal to the Maximum Contaminant Levels established for the individual parameters.

3) All field work done in connection with the facility's Sampling and Analysis Plan shall follow all applicable procedures described in DEP SOP-0001/01 (January 2002). All laboratory analyses done in connection with the facility's Sampling and Analysis Plan shall be conducted by firms that are certified by the Department of Health Environmental Laboratory Certification Program in accordance with the schedule referenced in Chapter 62-160, F.A.C. The SOPs utilized and the laboratory's list of certified test methods and analytes must be specifically address the types of sampling and analytical work that are required by the permit and shall be implemented by all persons performing sample collection or analysis related to this permit.

4) The field testing, sample collection, sample preservation and laboratory testing, including the collection of quality control samples, shall be in accordance with the requirements of and methods approved by the Department in accordance with Rule 62-4.246 and Chapter 62-160, F.A.C. Approved methods published by the Department, or as published in Standard Methods or by A.S.T.M., or EPA methods shall be used. Alternate field procedures and laboratory methods may be used if they have been approved according to the requirements of Rule 62-160.220 and 62-160.330, F.A.C.

c. The Department may decrease or increase the parameters to be analyzed for or the frequency of analysis based on monitoring data, changes in the waste stream or processing, or the potential presence of toxic substances.

d. Annually by June 1<sup>st</sup>, and upon completion of the project, a project report shall be provided with all compost and leachate analytical data, with conclusions and recommendations, signed and sealed by a professional engineer.

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### SPECIFIC CONDITIONS:

13. **Recordkeeping.** Records shall be maintained as required by Rule 62-709.530, F.A.C.

a. **Annually, no later than June 1st each year,** the owner or operator shall submit an annual report to the Department in accordance with Rule 62-709.530(3), F.A.C.

b. The permittee shall record and maintain for three years the information required by Rule 62-709.530(2), F.A.C. The permittee shall compile this information monthly, and shall submit a summary **quarterly, by March 1st, June 1st, September 1st and December 1st each year.** Records shall be available for inspection by Department personnel during normal business hours and shall be sent to the Department upon request.

14. **Stormwater System Management.** Stormwater shall be managed to meet applicable standards of Chapters 62-3, 62-302, and 62-330, F.A.C. The facility shall have a surface water management system operated and maintained to prevent surface water flow onto composting areas, and a stormwater runoff control system operated and maintained to collect and control stormwater to meet requirements of Florida Administrative Code 62-330 and requirements of the respective water management district.

15. **Waste Burning.** Open burning of solid waste is prohibited except in accordance with Rules 62-701.300(3) and 62-256, F.A.C. Controlled burning of solid waste is prohibited at this site except for clean vegetative and wood wastes which may be burned in a permitted air curtain incinerator in accordance with Rule 62-296.401, F.A.C. Any accidental fires which require longer than **one (1) hour** to extinguish must be promptly reported to the Department.

16. **Fire Safety Survey.**

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 1st** 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.

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**SPECIFIC CONDITIONS:**

**17. Control of Nuisance Conditions.**

a. The operating authority shall be responsible for the control of odors and fugitive particulates 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 mosquitoes and rodents or request such control measures from the local mosquito control office, as so to protect the public health and welfare.

b. Odor Control. The owner or operator shall inspect the facility boundaries at least **daily** for the presence of odor. In the event that odors are detected, the owner or operator shall **immediately (within 24 hours)** implement corrective actions to abate the odor. If the corrective measures do not sufficiently control the odor, the Department shall be notified in accordance with Specific Condition #18, and a plan for additional corrective measures shall be submitted. In the event that odor complaints are received from adjacent property owners/operators, the facility shall cease accepting material until the odors have been adequately controlled.

**18. Facility Maintenance and Repair.** The site shall be properly maintained including grading, prevention of ponding, and maintenance of composting subgrades and equipment. In the event of damage to any portion of the site facilities, failure of any portion of the facility systems, or in the event of a fire, the permittee shall **immediately (within 24 hours)** notify the Department of Environmental Protection explaining such occurrence, method to prevent reoccurrence, and remedial measures to be taken and time needed for repairs. Written detailed notification shall be submitted to the Department **within seven (7) days** following the occurrence.

**19. 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.

**20. 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.

**21. 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.

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PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

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**SPECIFIC CONDITIONS:**

22. **Regulations.** The requirements of Chapter 62-709, F.A.C., effective October 22, 2000, are incorporated into this permit by reference. In the event that the regulations governing this permitted operation are revised, the Department shall notify the permittee, and the permittee shall request modification of those specific conditions which are affected by the revision of regulations to incorporate those revisions.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

**DRAFT**

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Deborah A. Getzoff  
Director of District Management  
Southwest District



ATTACHMENT 1

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SPECIFIC CONDITION	SUBMITTAL DUE DATE	REQUIRED ITEM
4.	180 days prior to permit expiration	Permit Renewal Application or extend the expiration date
7.b.	Annually, by June 1st	Submit updated Operations Plan
12.d.	Annually, by June 1st	Submit Project Report
13.a.	Annually, by June 1st	Submit Annual Report
13.b.	Quarterly, by March 1st, June 1st, September 1st, and December 1st	Waste quantity reports, compost production report, compost analysis
18.	Within 24 hours of occurrence	Notify FDEP of system failure
18.	Within 7 days of occurrence	Written notification of system failure, and schedule for repair

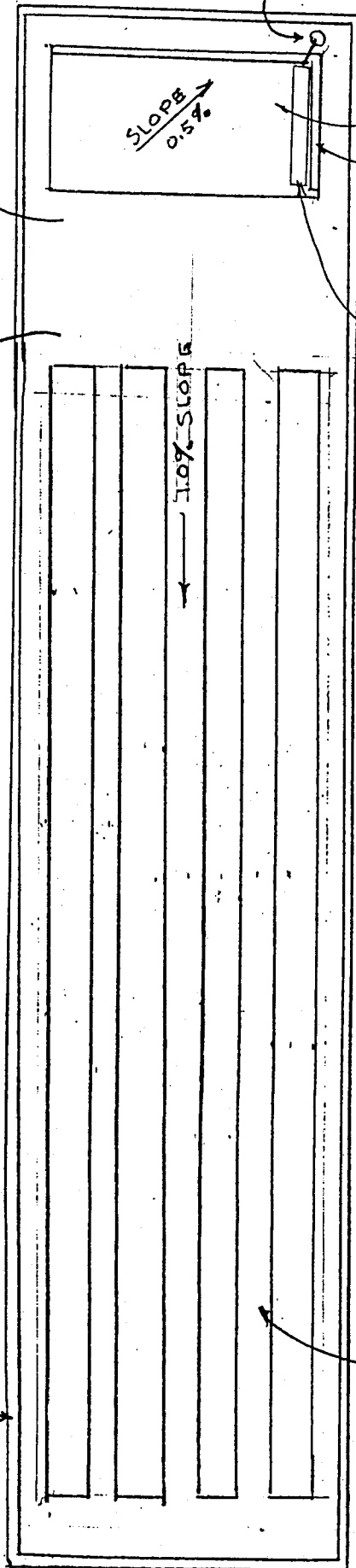
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N  
1" = 30'

ACCESS RAMP

EARTH BERM

275'



AG BAG AREA

(4) BAGS 5' DIA (4 1/4' x 7 1/2')

24\"/>

25' x 50' CONC  
RECEIVING PAD  
9\"/>

25' x 50' x 6\"/>

6\"/>

TRENCH DRAIN  
3\"/>

18\"/>

TRENCH DRAIN  
(TYP.)

PROFILE (NTE)

YARD PLAN

FOOD COMPOSTING FACILITY

DEC 2002 D.P.A. WINGLER, P.E.  
REV 2-8-03

PAGE NO. 3

PAUWING  
1/4/03

**Ford, Kim**

---

**From:** jesse white [jesse.white@rmg.us]  
**Sent:** Tuesday, March 18, 2003 11:48 AM  
**To:** Ford, Kim  
**Cc:** Project Manager Paul A. Wingler; ESBC Solid Waste Jean Nutter; Boroff, Suzanne; Joyal, Francine; Cory Jamieson  
**Subject:** Release of Intent To Issue Composting Facility Permit

Dear Kim Ford,

Thank you for expediting the release of an Intent To Issue Permit for Sarasota County's Pilot Composting Facility. We wanted to confirm that the final permit will include language in Specific Condition 9a that specifies that "biodegradable materials associated with food waste" are acceptable for the facility, pursuant to your conversation with Paul Wingler.

We understand that FDEP is releasing the intent to issue today (3/18/03), and the permit will be finalized pending no objections during a 14 day public notice period. Please copy us on correspondence, our fax is 941-362-4290 (email and mail address below).

Thank you again,

Jesse

Jesse White  
President  
Resource Management Group, Inc.  
jesse@rmg.us

www.rmg.us

-----  
"RMG - Creating sustainable programs for business and government to manage solid waste efficiently through waste reduction, materials reuse, recycling, and compost production."

Resource Management Group, Inc.  
1143 Central Ave  
Sarasota, FL 34236  
941-358-7730  
\*NEW\* 941-362-4290 FAX  
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# Department of Environmental Protection

DEP Form #	62-701.900(10)
Ap. for Per. to Construct/Operate a Solid	
Form Title	Waste Mgmt. Fac. for Prod. of Compost
Effective Date	12-23-96
DEP Application No.	
(Filled in by DEP)	

## Application for a Permit to Construct ☒ Operate ☒ A Solid Waste Management Facility for the Production of Compost

### General Requirements

Solid Waste Management Facilities for the production of compost or mulch shall be permitted pursuant to Section 403.707, Florida Statutes, and in accordance with Rule 62-709, Florida Administrative Code. A minimum of six copies of the application shall be submitted to the Department district Office having jurisdiction over the facility. Complete appropriate sections for the type of facility for which application is made. Entries should be typed or printed in ink. All blanks should be filled in or marked not applicable. The application shall include all information, drawings, and reports necessary to evaluate the facility. Information required to support the application is listed on the attached pages of this form.

Confirmed 3/14/03 km

Facility Type: ☐ Existing ☒ Proposed

Materials Processed: ☐ Yard Trash ☐ Manure ☒ Other Solid Wastes ☐ Solid Wastes with Sludge

a. Facility Name: Food Composting Facility

b. Facility Location (main entrance): Central County Solid Waste Disposal Complex, Knights Trail Road, Sarasota County

Section 9-16, Township 38S, Range 19E Latitude 27 ° 12 ' 00 " Longitude 82 ° 23 ' 15 "

a. Applicant Name (operating authority): Sarasota County

b. Address: 4000 Knights Trail Road Nokomis FL 34275  
Street P.O. Box City State Zip Code

c. Contact Person: Gary Bennett 941-486-2600  
Name Telephone Number

a. Authorized Agent/Consultant: Resource Management Group, Inc.

b. Address: 200 S. Washington Blvd. Sarasota FL 34236  
Street P.O. Box City State Zip Code

c. Contact Person: Mike Sosadeeter 941-358-7730  
Name Telephone Number

a. Landowner (if different than applicant): \_\_\_\_\_

b. Address: \_\_\_\_\_  
Street P.O. Box City State Zip Code

Estimated Cost of Construction, Total: \$ 171,550

Anticipated Construction Starting and Completion Dates From: 8/1/02 To: 9/30/02

CLASS I AND FOOD

27 12 09

82 23 15

WT

27 11 58

82 23 02

MRF

27 11 54

82 23 00

Oracle Developer Forms Runtime - Web  
Query Coll Rpts Rfind Exit CRA Window

ORACLE

Cash Receiving Application - Collection Point Log Remittance

Collection Point Log Remittance

AREA **SWD** Tot **CRAF006A \$1,000.00**

Remittance **478400** Type **CP** Recvd Date **06/17/2002** Status **RECEIVED**

SYSSRCPT **386086** PNR  Check # **00794488** Amount **1,000.00**

SSNFEH#  Name **SARASOTA CO BD CO COMM**

First  Middle  Title  Sur

Address1 **4000 KNIGHTS TRAIL ROAD** Short Comments

Address2  **S-SW 200819-001**

City **NOKOMIS** ST **FL** Zip **34275** Country

PAYMENT(S)

Payment#	Distr CL Area	Object Code/Description	Payment Amount	Reference#	Applic Fund *	Status
511701	SWD	002245 SOLID WASTE-OPE	\$1,000.00		PA PFTF	COMPLETE

COMMIT FREQUENTLY **\$1,000.00** Payment total

Oracle Developer Forms Runtime - Web  
Permits Events Payment Site Billing Party Lst Help Exit Window

ORACLE

Permitting Application - Permit Detail and Log Permit

SITE Permit

Site Name **FOOD COMPOSTING FACILITY** Site # **0200819**

County **SARASOTA** Comments  RPAs  # Cases

Project

Permit #  Project # **001** Received **06/17/2002** CRA# **124065**

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

Project Name **FOOD COMPOSTING FACILITY** Desc

Type/Sub/Des **SO / 21 SOL WASTE R & D** COE #

Logged **06/21/2002** Issued  Expires  OGC

Fee **1000.00** Fee Recd **1000.00** Delc  Override **NONE**

Related Party

Role **APPLICANT** Begin **06/21/2002** End

Name **SOSADEETER, MIKE** Company **RESOURCE MANAGEMENT GROUP, INC.**

Addr **200 S. WASHINGTON BLVD.**

City **SARASOTA** State **FL** Zip **34236** County **U.S.A.**

Phone **941-358-7730** Fax

Processors

Processor **FORD\_K** v Active **06/21/2002** Inactive  Events

Enter date application was received. MM/DD/YYYY  
Record 1/1

Post-it Fax Note	7671	Date	3/10/03	# of pages	1
To	Kim Ford	From	Paul Wiegler		
Co./Dept.	7DEP	Co.			
Phone #		Phone #	(941) 861-1578		
Fax #	(813) 744-6125	Fax #	(941) 486-2620		

PERMIT NO: 200219-001-00

Issued by: [illegible]

**SPECIFIC CONDITIONS:**

- b. The facility site shall be constructed and operated to prevent ponding of water.
- c. Measures shall be taken to avoid mixing unprocessed materials with finished compost.
- d. Adequate equipment and reserve equipment shall be available for managing the material. In the event that equipment becomes inoperable, reserve equipment shall be operating at the site within 24 hours of equipment breakdown.
- e. Litter shall be collected daily on operating days.
- f. The facility shall have an all-weather access road, and shall maintain adequate access to the receiving, processing and storage areas at all times.
7. **Operation Plan and Operating Record.**
- a. Each facility owner or operator shall have an operational plan. 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 inspections.
- b. Annually, no later than June 1st each year, the permittee shall either submit an updated Operations Plan which includes any revisions or modifications to the facility design or operations, or in the event that no changes have occurred, the permittee shall notify the Department that the facility design and operations have not changed from the permitted activity.
8. **Control of Access.** Access to, and use of, the facility shall be controlled as required by Rule 62-709.500(4)(b), F.A.C.
9. **Monitoring of Waste.**
- a. This permit authorizes the acceptance, processing and management of yard trash mulch, and food waste only.
- b. Wastes shall be monitored as required by Rule 62-709.500(5)(c), F.A.C. Sufficient operating personnel shall be at the facility at all times when waste is received or processed. Incoming wastes shall be inspected for unacceptable wastes immediately after being received. Unacceptable wastes shall be removed immediately from incoming loads.
- c. The permittee, owner or operator shall not accept mulch from painted or treated (e.g. pentachlorophenol, creosote, or CCA treated) wood for processing or storage at this facility.

biodegradable

**DRAFT**

materials associated with food waste,

**Ford, Kim**

**From:** Joyal, Francine  
**Sent:** Friday, March 14, 2003 1:53 PM  
**To:** Ford, Kim  
**Cc:** Pelz, Susan; Clark, Jan Rae; Boroff, Suzanne  
**Subject:** Draft food composting permit - Sarasota  
 Kim,

I have a couple of comments concerning Specific Condition 12 in the draft permit for the Sarasota Innovative Grant Project -- composting operation:

Regarding 12.a, I do not believe they should be required to test the compost for parameters that are not required by rule. I suggest modifying to make it optional **OR** deleting:  
 " , and for the following parameters:

- Arsenic
- DDT
- Chlorinated and nitrogen/phosphorus pesticide scan"

Regarding 12.b, delete DDT because this parameter is already included in the chlorinated pesticide scan.

Francine





Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

*John  
GOT A  
WACS #?*

## PERMITTEE

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 Knights Trail Road  
Nokomis, FL 34275

## PERMIT/CERTIFICATION

WACS Facility ID No: *SWD/58/51614*  
Permit No: 200819-001-SO  
Date of Issue:  
Expiration Date:  
County: Sarasota  
Lat/Long: 27° 12' 09"N  
82° 23' 15"W  
Sec/Town/Rge: 1-4, 9-16/38S/19E  
Project: Food Composting  
Facility Operation - CCSWDC

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-522, 62-550, 62-701, and 62-709. 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 composting facility (approximately 1/2 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida. The specific conditions attached are for the operation of a:

1. Food Composting Facility

**Replaces Permit No.: N/A, new**

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.

**Ford, Kim**

---

**From:** jesse white [jesse.white@rmg.us]  
**Sent:** Thursday, March 13, 2003 5:04 PM  
**To:** Ford, Kim  
**Cc:** ESBC Solid Waste Jean Nutter; Joyal, Francine; Boroff, Suzanne; Pelz, Susan; Project Manager Paul A. Wingler; cory jamieson; Solid Waste Operations Manager Gary Bennett  
**Subject:** DRAFT Sarasota County Food Composting Facility Permit

Dear Kim Ford,

Thank you for faxing a DRAFT of the Food Composting Facility permit to us today. It looks like we have made significant progress and that the Intent To Issue is imminent. We are currently reviewing the requirements and specifications. We understand that this is a DRAFT of the permit and that this does not give notice to proceed in developing the facility.

What is the next step? If Sarasota County reviews the draft and agrees to its terms, limitations, and compliance items, we are hoping that you can **issue this Intent to Issue on Monday**. This will trigger the 14 day waiting period.

During the waiting period we would like to schedule a conference call between FDEP Tallahassee, FDEP District, Sarasota County and other involved parties to discuss development of a sampling plan for parameters not explicitly identified in the facility permit.

Please contact us as soon as possible to let us know the earliest date that an Intent to Issue can be set forth. If I am not available, please speak with Cory. Thanks again for your help on this.

Jesse

Jesse White  
President  
Resource Management Group, Inc.  
jesse@rmg.us

www.rmg.us

-----  
"RMG - Creating sustainable programs for business and government to manage solid waste efficiently through waste reduction, materials reuse, recycling, and compost production."

Resource Management Group, Inc.  
1143 Central Ave  
Sarasota, FL 34236  
941-358-7730  
\*NEW\* 941-362-4290 FAX  
-----

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

P.1

Mar 13 2003 13:26

Telephone Number	Mode	Start	Time	Pages	Result	Note
819413624290	NORMAL	13.13:10	15'28"	15	OK	

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION3804 Coconut Palm Drive  
Tampa, FL 33619-8318**FAX**

Date:

3/13/03

Number of pages including cover sheet:

15

To:

Jesse White

Resource Management Group

Phone:

441 358 7730

Fax phone:

441 362 4290

CC:

From:

Jim Ford

Phone:

(813) 744-6100

x 382

Fax phone:

(813) 744-6125

REMARKS:

☐ Urgent☒ For your review☐ Reply ASAP☐ Please comment

Copy of "Draft" permit as requested

-This is NOT FINAL AND IS

NOT AUTHORIZATION TO PROCEED

An intent to issue is required

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

3804 Coconut Palm Drive  
Tampa, FL 33619-8318

**FAX**

Date:

3/13/03

Number of pages including cover sheet:

15

To:

JEFF WHITE

Resource Management Group

Phone:

941 358 7730

Fax phone:

941 362 4290

CC:

From:

Jim Ford

Phone:

(813) 744-6100

x 382

Fax phone:

(813) 744-6125

REMARKS:

☐ Urgent

☒ For your review

☐ Reply ASAP

☐ Please comment

Copy of "DRAFT" permit as requested

- This is NOT FINAL AND IS  
NOT AUTHORIZATION TO PROCEED

An Intent to Issue is REQUIRED  
AND A 14 DAY WAITING PERIOD  
AFTER PUBLICATION.

Any Questions, please call. Jim

**PERMITTEE**

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 Knights Trail Road  
Nokomis, FL 34275

**PERMIT/CERTIFICATION**

WACS Facility ID No:  
Permit No: 200819-001-SO  
Date of Issue:  
Expiration Date:  
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82° 23' 15"W  
Sec/Town/Rge: 1-4, 9-16/38S/19E  
Project: Food Composting  
Facility Operation - CCSWDC

**DRAFT**

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-522, 62-550, 62-701, and 62-709. 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 composting facility (approximately 1/2 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida. The specific conditions attached are for the operation of a:

1. Food Composting Facility

**Replaces Permit No.: N/A, new**

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.

**DRAFT**

**DRAFT**

**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.

PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

**DRAFT**

**GENERAL CONDITIONS:**

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;
- (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.

**DRAFT**

**GENERAL CONDITIONS:**

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.

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.



PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

**DRAFT**

**GENERAL CONDITIONS:**

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.

**DRAFT**

**SPECIFIC CONDITIONS:**

1. **Facility Designation.** This site shall be classified as a yard trash mulch and food waste composting facility and shall be operated in accordance with all applicable requirements of Chapters 62-4, 62-330, 62-522, 62-550, 62-701 and 62-709 Florida Administrative Code (F.A.C.) and all applicable requirements of Department Rules. This permit does not relieve the permittee's responsibility to comply with all applicable state, federal and local regulations which may govern this operation.

2. **Permit Application Documentation.** This permit authorizes the operation of the temporary composting facility in accordance with the reports, plans and other information as follows:

a. Application to Operate the Food Composting Facility, with related documents, received June 17, 2002;

b. Response letter by Sarasota County dated January 13, 2003 received on January 17, 2003;

c. Supplemental response letter and drawings (including the Yard Plan - Page No. 3) by Sarasota County dated February 4, 2003, received on February 5, 2003;

and in accordance with all applicable requirements of Department rules.

3. **Permit Modifications.** Any activities 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 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 **ninety (90) 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 (if necessary to continue operation beyond the expiration date), in order to assure conformance with all applicable Department rules.

5. **Prohibitions.** The prohibitions of Rule 62-701.300, F.A.C., shall not be violated.

6. **Facility Operation Requirements.**

a. The permittee shall operate this facility in accordance with the information referenced in Specific Condition #2, above, and applicable Department rules.

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**DRAFT**

**SPECIFIC CONDITIONS:**

- b. The facility site shall be constructed and operated to prevent ponding of water.
  - c. Measures shall be taken to avoid mixing unprocessed materials with finished compost.
  - d. Adequate equipment and reserve equipment shall be available for managing the material. In the event that equipment becomes inoperable, reserve equipment shall be operating at the site **within 24 hours** of equipment breakdown.
  - e. Litter shall be collected daily on operating days.
  - f. The facility shall have an all-weather access road, and shall maintain adequate access to the receiving, processing and storage areas at all times.
7. **Operation Plan and Operating Record.**
- a. Each facility owner or operator shall have an operational plan. 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 inspections.
  - b. **Annually, no later than June 1st each year,** the permittee shall either submit an updated Operations Plan which includes any revisions or modifications to the facility design or operations, or in the event that no changes have occurred, the permittee shall notify the Department that the facility design and operations have not changed from the permitted activity.
8. **Control of Access.** Access to, and use of, the facility shall be controlled as required by Rule 62-709.500(4)(b), F.A.C.
9. **Monitoring of Waste.**
- a. This permit authorizes the acceptance, processing and management of yard trash mulch and food waste only.
  - b. Wastes shall be monitored as required by Rule 62-709.500(5)(c), F.A.C. Sufficient operating personnel shall be at the facility at all times when waste is received or processed. Incoming wastes shall be inspected for unacceptable wastes immediately after being received. Unacceptable wastes shall be removed immediately from incoming loads.
  - c. The permittee, owner or operator shall not accept mulch from painted or treated (e.g. pentachlorophenol, creosote, or CCA treated) wood for processing or storage at this facility.

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**SPECIFIC CONDITIONS:**

- d. The permittee shall not accept hazardous waste or any hazardous substance at this site. Hazardous waste is a waste in Chapter 62-730, F.A.C. Hazardous substances are those defined in Section 403.703, Florida Statute or in any other applicable state or federal law or administrative rule.
10. **Waste Handling Requirements.**
- a. The composting facility shall be operated so as to handle solid wastes on first-in, first-out basis.
- b. Food waste shall be processed **daily** on operating days or removed for off-site disposal **within 24 hours** of receipt at the composting facility.
- c. Material which has completed the composting process shall be removed from the site within three months.
- d. In the event that the storage capacity has been reached, no additional material shall be accepted at the facility until sufficient storage and/or processing capacity has been restored.
11. **Material Storage Requirements.**
- a. The storage capacity of this facility is limited to 580 cubic yards total of in-process material, finished compost, or a combination thereof (i.e. 4-Ag Bags rows). The compost windrows shall be formed and managed in accordance with the layout shown on the Yard Plan (attached).
- b. Storage of yard trash mulch and unprocessed food wastes is limited to the "receiving pad" as shown on the Yard Plan.
- c. Yard trash mulch which will not be made into compost or processed into other usable material shall be removed at least **monthly**.
- d. All solid waste (yard trash mulch, food waste, or compost) received, processed or stored at the composting facility shall be stored, processed and managed in a manner so as not to constitute a fire or safety hazard or a sanitary nuisance. Likewise, these materials shall be stored, processed and managed such that odors and vectors are minimized.
- e. Plastic bags and solid waste other than the authorized materials for the facility, shall be separated and stored in a manner that prevents odor and vector problems and shall be removed **within 24 hours** of receipt. If odors are determined to be a nuisance at the site boundaries, or if rainfall damages the final curing piles, odor controls or waterproof covers may be required.

**DRAFT**

SPECIFIC CONDITIONS:

**DRAFT**

12. Sampling and Quality Assurance.

a. Sampling and analysis of the finished compost shall be in accordance with Rule 62-709.530(1)(a) and (c), F.A.C., and for the following parameters:

Arsenic  
DDT  
Chlorinated and nitrogen/phosphorus pesticide scan.

b. Leachate Sampling and Analysis. In the event that the permittee wishes to demonstrate that the leachate produced by the facility operation meets Department water quality standards, then the leachate must be sampled and analyzed for the following parameters:

- 1) Water quality parameters listed in 62-701.510(8)(a) and (b)  
DDT  
Chlorinated and nitrogen/phosphorus pesticide scan

The demonstration must include a statistically significant number of samples equally distributed throughout the demonstration period.

- 2) Method Detection Limits must be less than or equal to the Maximum Contaminant Levels established for the individual parameters.

- 3) All field work done in connection with the facility's Sampling and Analysis Plan shall follow all applicable procedures described in DEP SOP-0001/01 (January 2002). All laboratory analyses done in connection with the facility's Sampling and Analysis Plan shall be conducted by firms that are certified by the Department of Health Environmental Laboratory Certification Program in accordance with the schedule referenced in Chapter 62-160, F.A.C. The SOPs utilized and the laboratory's list of certified test methods and analytes must be specifically address the types of sampling and analytical work that are required by the permit and shall be implemented by all persons performing sample collection or analysis related to this permit.

**DRAFT**

**DRAFT**

**SPECIFIC CONDITIONS:**

4) The field testing, sample collection, sample preservation and laboratory testing, including the collection of quality control samples, shall be in accordance with the requirements of methods approved by the Department in accordance with Rule 62-4.246 and Chapter 62-160, F.A.C. Approved methods published by the Department, or as published in Standard Methods or by A.S.T.M., or EPA methods shall be used. Alternate field procedures and laboratory methods may be used if they have been approved according to the requirements of Rule 62-160.220 and 62-160.330, F.A.C.

c. The Department may decrease or increase the parameters to be analyzed for or the frequency of analysis based on monitoring data, changes in the waste stream or processing, or the potential presence of toxic substances.

d. Annually, and upon completion of the project, a project report shall be provided with all compost and leachate analytical data, with conclusions and recommendations, signed and sealed by a professional engineer.

13. **Recordkeeping.** Records shall be maintained as required by Rule 62-709.530, F.A.C.

a. **Annually, no later than June 1st each year**, the owner or operator shall submit an annual report shall be submitted to the Department in accordance with Rule 62-709.530(3), F.A.C.

b. The permittee shall record and maintain for three years the information required by Rule 62-709.530(2), F.A.C. The permittee shall compile this information monthly, and shall submit a summary **quarterly, by March 1st, June 1st, September 1st and December 1st each year**. Records shall be available for inspection by Department personnel during normal business hours and shall be sent to the Department upon request.

14. **Stormwater System Management.** Stormwater shall be managed to meet applicable standards of Chapters 62-3, 62-302, and 62-330, F.A.C. The facility shall have a surface water management system operated and maintained to prevent surface water flow onto composting areas, and a stormwater runoff control system operated and maintained to collect and control stormwater to meet requirements of Florida Administrative Code 62-330 and requirements of the respective water management district.

**DRAFT**

SPECIFIC CONDITIONS:

**DRAFT**

15. **Waste Burning.** Open burning of solid waste is prohibited except in accordance with Rules 62-701.300(3) and 62-256, F.A.C. Controlled burning of solid waste is prohibited at this site except for clean vegetative and wood wastes which may be burned in a permitted air curtain incinerator in accordance with Rule 62-296.401, F.A.C. Any accidental fires which require longer than **one (1) hour** to extinguish must be promptly reported to the Department.

16. **Control of Nuisance Conditions.**

a. The operating authority shall be responsible for the control of odors and fugitive particulates 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 mosquitoes and rodents or request such control measures from the local mosquito control office, as so to protect the public health and welfare.

b. Odor Control. The owner or operator shall inspect the facility boundaries at least **daily** for the presence of odor. In the event that odors are detected, the owner or operator shall **immediately (within 24 hours)** implement corrective actions to abate the odor. If the corrective measures do not sufficiently control the odor, the Department shall be notified in accordance with Specific Condition #17, below, and a plan for additional corrective measures shall be submitted. In the event that odor complaints are received from adjacent property owners/operators, the facility shall cease accepting material until the odors have been adequately controlled.

17. **Facility Maintenance and Repair.** The site shall be properly maintained including grading, prevention of ponding, and maintenance of composting subgrades and equipment. In the event of damage to any portion of the site facilities, failure of any portion of the facility systems, or in the event of a fire, the permittee shall **immediately (within 24 hours)** notify the Department of Environmental Protection explaining such occurrence, method to prevent reoccurrence, and remedial measures to be taken and time needed for repairs. Written detailed notification shall be submitted to the Department **within seven (7) days** following the occurrence.

18. **Fire Safety Survey.**

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 1st** 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.

**DRAFT**

PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

**DRAFT**

**SPECIFIC CONDITIONS:**

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.

19. **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.

20. **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.

21. **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.

22. **Regulations.** The requirements of Chapter 62-709, F.A.C., effective October 22, 2000, are incorporated into this permit by reference. In the event that the regulations governing this permitted operation are revised, the Department shall notify the permittee, and the permittee shall request modification of those specific conditions which are affected by the revision of regulations to incorporate those revisions.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

**DRAFT**

Deborah A. Getzoff  
Director of District Management  
Southwest District



PERMITTEE: Sarasota County  
Mr. Gary Bennett

PERMIT NO: 200819-001-SO  
Food Composting Facility Operation - CCSWDC

ATTACHMENT 1

**DRAFT**

SPECIFIC CONDITION	SUBMITTAL DUE DATE	REQUIRED ITEM
4.	180 days prior to permit expiration	Permit Renewal Application or extend the expiration date
7.b.	Annually, by June 1st	Submit updated Operations Plan
12.d.	Annually	Submit Project Report
13.a.	Annually, by June 1st	Submit Annual Report
13.b.	Quarterly, by March 1st, June 1st, September 1st, and December 1st	Waste quantity reports, compost production report, leachate analysis, compost analysis
17.	Within 24 hours of occurrence	Notify FDEP of system failure
17.	Within 7 days of occurrence	Written notification of system failure, and schedule for repair

**DRAFT**

N  
1" = 20'

ACCESS RAMP

EARTH BERM

275'

SLOPE  
0.5%

10% SLOPE

SAMPLE  
BUCKET

25' X 50' CONC  
RECEIVING PAD  
9" SAMPLE COLLECTION  
CURB

24" X 24"  
PUSH STOP

AG BAG AREA

(4) BAGS 5' DIA (4 1/4' X 7 1/4')

25' X 50' X 6" CONC PAD  
ON 8" NO 57 CONC.

6" MUECH. FILL

TRENCH DRAIN  
3' X 3' X 50' NO 57  
CONC. W/ GEO COVER

18" INTERMEDIATE  
COVER

TRENCH DRAIN  
(TYPE)

PROFILE (NTE)

YARD PLAN

FOOD COMPOSTING FACILITY

DEC 2002  
REV 2-23-03  
P.A. WINGLER, P.E.

PAGE NO. 3

PAWING  
2/4/03

**Ford, Kim**

---

**From:** jesse white [jesse.white@rmg.us]  
**Sent:** Wednesday, March 12, 2003 5:12 PM  
**To:** Ford, Kim  
**Cc:** ESBC Solid Waste Jean Nutter; Joyal, Francine; Boroff, Suzanne; Pelz, Susan  
**Subject:** RE: How does this sound?

Dear Kim Ford,

Thank you for taking the time to review Sarasota County's request to site a pilot composting facility within an active cell of its permitted landfill. We did not hear from you today. Have you made any progress on our request to issue a notice to proceed?

We spoke with Francine Joyal yesterday, and she suggested having a conference call to discuss the sampling plan. We could set up a conference call if requested and are certainly available to meet at your convenience. However, previously, District indicated that the development of a comprehensive sampling protocol is a separate issue to the granting of a permit/notice to proceed.

After speaking with you Monday March 10, 2003, and reviewing your comments to the County's previous request we believe that for the purposes of constructing the compost facility, no further information is required by Florida Statute, and that there is no statutory reason to delay the issuance a permit/notice to proceed for our project.

As previously indicated, we will sample compost produced in this project for the parameters outlined in FAC 62-709.530(1)(a) and (b) using certified laboratories per statute. Leachate and runoff will be collected and treated by the County in its existing landfill collection and treatment systems pursuant to FAC 62-25, 62-302, 62-330 and the County's operating permit.

We need a notice to proceed to allow us sufficient time to construct a pilot compost facility. Among the critical issues, is the construction of the receiving pad, operating pad, training food waste generators, and the ordering / receiving the AgBag invessel composting system.

We agree that developing a sampling plan that is not outlined in current statutes is an important activity that will require your attention and thoughtful feedback. This protocol/plan will be developed in cooperation with you, Francine Joyal, Sarasota County staff, and other involved parties. We will need your cooperation and involvement to develop a sampling plan that will be of value to FDEP. The plan will be developed after District's notice to proceed, and prior to the project accepting food waste. However we anticipate the plan to be developed in less than a month if we get the cooperation from all affected parties.

We would like to have a notice to proceed by the end of this week. We are available to help in any way to expedite the transfer of information. Please contact me tomorrow (Thursday) to discuss any questions or comments that you have.

Jesse

Jesse White  
President  
Resource Management Group, Inc.  
jesse@rmg.us

www.rmg.us


-----  
"RMG - Creating sustainable programs for business and government to manage  
solid waste efficiently through waste reduction, materials reuse, recycling,  
and compost production."

Resource Management Group, Inc.  
1143 Central Ave  
Sarasota, FL 34236  
941-358-7730  
\*NEW\* 941-362-4290 FAX  
-----

**Ford, Kim**

---

**From:** Black, Anna  
**Sent:** Wednesday, March 12, 2003 3:29 PM  
**To:** Joyal, Francine  
**Cc:** Ford, Kim  
**Subject:** DRAFT Permit as requested



200819-001-SO P.doc

**Ford, Kim**

---

**From:** Pelz, Susan  
**Sent:** Wednesday, March 12, 2003 10:53 AM  
**To:** Joyal, Francine; Ford, Kim; Boroff, Suzanne  
**Cc:** Clark, Jan Rae  
**Subject:** RE: Conference call today

I will be unavailable today for a teleconf (I'm out of the office at 1:30pm & have meetings back to back until then).... tomorrow's not much better... sorry

Kim, please email Francine the language we talked about this morning so she knows how we want to approach it in the permit.

Thanks

-----Original Message-----

**From:** Joyal, Francine  
**Sent:** Wednesday, March 12, 2003 9:25 AM  
**To:** Ford, Kim; Pelz, Susan; Boroff, Suzanne  
**Cc:** Clark, Jan Rae  
**Subject:** Conference call today  
**Importance:** High

I got a call yesterday from Jessie White about the food waste composting project in Sarasota -- permit and sampling protocol. Basically the same thing as he wrote in his email. I believe we need to chat about this and would like to set up a conference call for 1:00 pm today. I think we can keep this short, but it would be better if we're all hearing the same thing at the same time. Does that time work for you?

Susan -- After we talk about the composting project, I'd like to discuss the Asian Cycad Scale a bit.

Thanks -- Francine

**Ford, Kim**

---

**From:** jesse white [jesse.white@rmg.us]  
**Sent:** Tuesday, March 11, 2003 3:15 PM  
**To:** Ford, Kim  
**Cc:** Joyal, Francine; Project Manager Paul A. Wingler; Boroff, Suzanne; ESBC Solid Waste Jean Nutter; Cory Jamieson  
**Subject:** Sarasota County Food COMposting Project

Dear Kim,

Thank you for speaking with us yesterday.

Cory and I have been unable to reach Francine as you suggested. Therefore, could you please send me a copy of the sampling protocol you mentioned in our conversation on Monday? I understand that Francine drafted some concepts for you to review, we would like to take a look at this.

I think that you can agree that is imperative that we keep this project moving along toward an operating permit. Any assistance you can provide to that end would be greatly appreciated.

Jesse White  
President  
Resource Management Group, Inc.  
jesse@rmg.us

www.rmg.us

-----  
"RMG - Creating sustainable programs for business and government to manage solid waste efficiently through waste reduction, materials reuse, recycling, and compost production."

Resource Management Group, Inc.  
1143 Central Ave  
Sarasota, FL 34236  
941-358-7730  
\*NEW\* 941-362-4290 FAX  
-----

**Ford, Kim**

---

**From:** Ford, Kim  
**Sent:** Friday, March 07, 2003 2:55 PM  
**To:** Pelz, Susan; Morris, John R.  
**Subject:** FW: Food Composting Permit - Sarasota

Susan and John,

I gave you a copy of the draft permit with condition #12 to deal with the sampling. I would appreciate any suggestions to sort of fit this to Francine's list (being forwarded to you) and anything else that may be needed.  
Thanks.

Kim

-----Original Message-----

**From:** Joyal, Francine  
**Sent:** Wednesday, February 12, 2003 2:05 PM  
**To:** Ford, Kim  
**Cc:** Pelz, Susan; Clark, Jan Rae; Boroff, Suzanne; Tedder, Richard; McGuire, Chris  
**Subject:** RE: Food Composting Permit - Sarasota

Kim,

I believe the attached email is the one you could not find. I think it is important to distinguish those parameters a food waste composting operation must test for pursuant to rule requirements and those parameters that may provide information leading to future regulatory changes. The parameters that are not required at this time could support relaxing or increasing facility design and operation requirements, and permit renewal procedures.

Required testing:

Leachate parameters they should be required to test for pursuant to Rule 62-709.500(7) are the applicable standards of Chapters 62-25, 62-302 and 62-330, F.A.C.  
Compost product parameters are listed in Rules 62-709.530(1)(a) and (c).

Recommendations that would be OPTIONAL ONLY for those parameters that may provided information supporting future rule amendments:

Leachate parameters (additional pesticides may be identified at a later date):

Arsenic (This is a surface and groundwater parameter. But if they are not discharging, and therefore not testing for, it should then be included in the optional parameters)

Total Nitrogen

Total Phosphorus

DDT

Chlorinated (includes DDT) and nitrogen/phosphorus pesticide scan.

Compost product parameters that should be included as recommendations for OPTIONAL ONLY testing (additional pesticides may be identified at a later date):

Arsenic

DDT

Chlorinated (includes DDT) and nitrogen/phosphorus pesticide scan.

Francine



RE: Compost/  
Leachate Testing

-----Original Message-----

**From:** Ford, Kim  
**Sent:** Monday, February 10, 2003 3:00 PM  
**To:** Joyal, Francine  
**Cc:** Pelz, Susan  
**Subject:** Food Composting Permit - Sarasota

Francine :

I am drafting the permit for the food composting facility, you know the one with the grant, and would like your help in preparing conditions related to sampling. It seems like you and Susan may have already briefly discussed this but I cannot find the e-mail. I just want to be sure that what we ask for in the permit matches up with what we expect as part of the grant, and to make sure that we have what we need to make our final decision on allowing it in the future without a liner or not.

Thanks.

Kim

**Ford, Kim**

---

**From:** Joyal, Francine  
**Sent:** Wednesday, February 12, 2003 2:05 PM  
**To:** Ford, Kim  
**Cc:** Pelz, Susan; Clark, Jan Rae; Boroff, Suzanne; Tedder, Richard; McGuire, Chris  
**Subject:** RE: Food Composting Permit - Sarasota

Kim,

I believe the attached email is the one you could not find. I think it is important to distinguish those parameters a food waste composting operation must test for pursuant to rule requirements and those parameters that may provide information leading to future regulatory changes. The parameters that are not required at this time could support relaxing or increasing facility design and operation requirements, and permit renewal procedures.

Required testing:

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Compost product parameters that should be included as recommendations for OPTIONAL ONLY testing (additional pesticides may be identified at a later date):

Arsenic

DDT

Chlorinated (includes DDT) and nitrogen/phosphorus pesticide scan.

Francine



RE: Compost/  
Leachate Testing

-----Original Message-----

**From:** Ford, Kim  
**Sent:** Monday, February 10, 2003 3:00 PM  
**To:** Joyal, Francine  
**Cc:** Pelz, Susan  
**Subject:** Food Composting Permit - Sarasota

Francine :

I am drafting the permit for the food composting facility, you know the one with the grant, and would like your help in preparing conditions related to sampling. It seems like you and Susan may have already briefly discussed this but I cannot find the e-mail. I just want to be sure that what we ask for in the permit matches up with what we expect as part of the grant, and to make sure that we have what we need to make our final decision on allowing it in the future without a liner or not.

Thanks.

Kim

**Ford, Kim**

---

**From:** Pelz, Susan  
**Sent:** Thursday, August 22, 2002 8:23 AM  
**To:** Joyal, Francine; Ford, Kim  
**Cc:** McGuire, Chris; Tedder, Richard; Clark, Jan Rae  
**Subject:** RE: Compost/Leachate Testing

Looks o.k. to me, but I think his question really stems from whether or not runoff from the curing area should be considered to be leachate. I think it is. He may be able to collect the runoff & test it to show that it meets water quality stds, but it's still leachate & he shouldn't discharge it until he knows it meets stds. If he wants to discharge into a surface water body he may need to be thinking NPDES.

Clearly the mixing area has leachate which needs to be collected and disposed of appropriately.

-----Original Message-----

**From:** Joyal, Francine  
**Sent:** Wednesday, August 21, 2002 10:55 AM  
**To:** Pelz, Susan; Ford, Kim  
**Cc:** McGuire, Chris; Tedder, Richard; Clark, Jan Rae  
**Subject:** FW: Compost/Leachate Testing

As you can see, I've heard from Chris. Since Mike Sosadeeter emailed you with the questions, I'll leave it to you to reply.

To summarize my comments:

1. Parameters for compost testing are found in 62-709.530, F.A.C. There are no other compost parameters that would apply to permit processing. But, since this is a new permit or modification of the existing landfill permit, they need to follow the requirements in Chapter 62-160, F.A.C.
2. The parameters applicable (permit-wise) to the stormwater/leachate issue are what ever class surface water applies to the site in Chapter 62-302, F.A.C.

I intend to return Mike's call and add that for data collection to see if requirements can be relaxed for food waste compost (i.e., future rule making), I would look at the Class I surface water requirements.

Francine

-----Original Message-----

**From:** McGuire, Chris  
**Sent:** Tuesday, August 20, 2002 10:39 PM  
**To:** Joyal, Francine  
**Cc:** Tedder, Richard  
**Subject:** RE: Compost/Leachate Testing

Francine, 62-160 contains a provision that existing permits continue to comply with the old QA requirements until the time for permit renewal, so I would say that unless the applicant wants to apply for a modification now, they can continue to rely on their previously-approved QA plan. But we might need to do a little interpretive memo saying that the specific provision in 62-709 should be read in conjunction with the new 62-160 for new facilities, modifications, or renewals.

Also, you are correct that we cannot use 62-777 for compost facilities.

-----Original Message-----

**From:** Joyal, Francine  
**Sent:** Tuesday, August 20, 2002 2:15 PM  
**To:** Pelz, Susan; Ford, Kim

Cc: McGuire, Chris; Clark, J. Rae  
Subject: RE: Compost/Leachate Testing

I have a call from Mike that I have not responded to yet myself about clarification of what they need to test for. He is right that testing the compost itself is covered in Rule 62-709.530, F.A.C., with classification found in Rule 62-709.550, F.A.C. But, I would also mention Chapter 62-160, F.A.C., which applies to quality assurance.

[CHRIS - Rule 62-709.530(1)(e), F.A.C., specifies "Sample collection, preservation, and analysis shall assure valid and representative results pursuant to a Department-approved quality assurance plan", but QA plans no longer exist in the current Chapter 62-160, F.A.C. How do we handle this now? Can we do an interim policy memo without getting into trouble for incipient rulemaking?]

Regarding leachate, Rule 62-709.500(7)(a), F.A.C., does specify leachate reuse or treating it to meet applicable standards of Chapters 62-25 (Stormwater Discharge), 62-302 (Surface Water Quality) and 62-330 (Environmental Resource Permitting), F.A.C. These referenced regulations, especially Chapter 62-302, F.A.C., are the ones they need to look at for testing parameters. But, I believe there are two desired outcomes. One would be for the specific site situation and the ability to direct stormwater from the curing area into the existing stormwater system. The other desired outcome is more long range -- data to help assure DEP that relaxed requirements for food waste composting operations would still be protective of the environment.

As far as what results need to be achieved so that we can be comfortable with release into stormwater, then I believe the analytical results should comply with the category the current system is subject to in Chapter 62-302, F.A.C. But for a blanket relief for future systems, we should consider the standards for Class I surface waters (potable water sources), and perhaps the surface water cleanup target levels in 62-777, F.A.C.

I did a quick comparison between the tables in Chapters 62-302 and 62-777, F.A.C., and it appears that most values in 62-777 are the same as for Class I surface waters. But, in some cases Chapter 62-777, F.A.C., is more stringent. However, it is questionable whether we can apply the Chapter 62-777, F.A.C., requirements to a composting facility permit or any other situation not specifically authorized by the statutes. Until such time as our ability to use Chapter 62-777, F.A.C., is cleared up, I recommend using Chapter 62-302, F.A.C., Class I surface waters for consideration in relieving requirements of food waste composting facilities (as stated above). Also, note that Chapter 62-302, F.A.C., addresses additional parameters such as bacteriological, biological integrity, BOD, specific conductance, dissolved oxygen, dissolved solids, nutrients, oils and greases, pH, and turbidity. Some parameters in Chapter 62-302, F.A.C., are based on background, such as the turbidity criteria being less than or equal to 29 NTU about natural background.

-----Original Message-----

From: Pelz, Susan  
Sent: Monday, August 19, 2002 4:02 PM  
To: Ford, Kim; Joyal, Francine  
Subject: RE: Compost/Leachate Testing

I think I told him in the pre-application meeting that runoff from material which is in the curing area is considered to be leachate. Until the "cured" material meets the definition of "finished compost" I don't think we can let him just run it off to stormwater. If he wants to capture the runoff & test it to see if it meets surface and/or groundwater standards, he can try to do that, but he needs to collect it & sample before discharge.

Francine, what do you think?

-----Original Message-----

From: Ford, Kim  
Sent: Monday, August 19, 2002 2:02 PM  
To: Pelz, Susan  
Cc: Joyal, Francine

Subject: FW: Compost/Leachate Testing

I am sure he wants to know how clean is clean for leachate so that it doesn't not need to be collected from some composting or curing area. Someone at our meeting on Thursday the 15th suggested our stormwater rule requirement since they want it to run off to a stormwater ditch.

Kim

-----Original Message-----

From: Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]

Sent: Friday, August 16, 2002 4:17 PM

To: Ford, Kim

Subject: Compost/Leachate Testing

Kim,

Thanks for the energetic meeting yesterday.

I have a question about testing procedures for compost and leachate.

I have read rules 62-709.530 and 62-709.550 about compost testing and classification. Are these the only rules I need to follow regarding the testing of compost? Are there any other rules I need to be aware of?

Are there any rules regarding the testing of leachate?

Thanks,

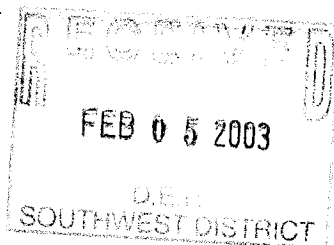
Mike

Mike Sosadeeter, Project Manager  
Resource Management Group, Inc.  
200 S. Washington Blvd., Suite 10  
Sarasota, Florida 34236  
941-358-7730  
941-358-7731 FAX



## SARASOTA COUNTY

*"Dedicated to Quality Service"*



February 4, 2003

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Facsimile (813) 744-6125

Re: Central County Solid Waste Disposal Complex  
Food Composting Facility (FCF)  
Pending Permit No. 200819-001-SO, Sarasota County

Dear Mr. Ford:

This letter is a supplement to my letter of January 13, 2003 as well as a transmittal of the referenced plans.

The following support data is provided:

Page 1 Site Location  
Page 2 Topo Segment  
Page 3 Yard Plan  
Page 4 Details

As we discussed, with respect to Item 4 (62-709.500) of your original letter, elevations have not been provided at this time. However, a 1.0% slope has been specified for the general site and a 0.5% slope is proposed for the concrete Mixing/Receiving Pad.

Similarly, Item 10 (62-709.500) (7b) - the entire operation will be located in an area that has been provided with intermediate cover.

Please call me at (941) 861-1578 after you have reviewed your file so that we can visit the proposed site.

Sincerely,

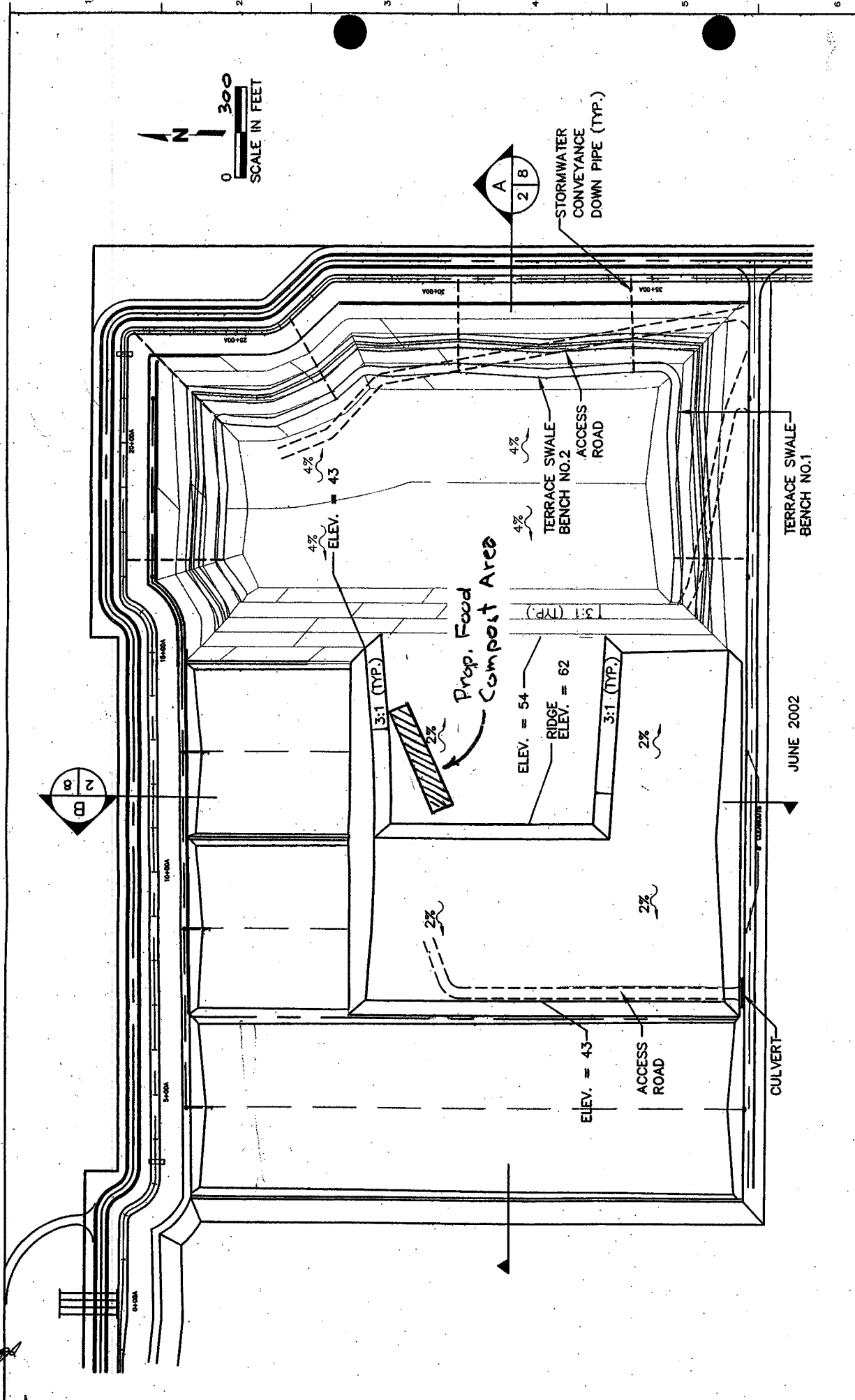
Paul A. Wingler, P.E.

*Interim Solid Waste Operations Manager*

### Attachments

cc: Gerald L. Bennett, General Manager, Solid Waste  
Larry Alexander, Onyx Waste Services of Florida, Inc.  
Jean Nutter, Program Specialist  
Susan J. Pelz, P.E., FDEP - Tampa

\\NFADMR1\DATA1\CCSWDP\SHARED\projects\Central County Solid Waste Disposal Complex\FDEP\Kim Ford - food waste pending permit - 2-4-03.doc



<b>SCS ENGINEERS</b> CONSULTING ENGINEERS 3000 N. W. 10th Ave., Suite 200, Tampa, FL 33610 PH: (813) 252-0000 FAX: (813) 252-0250		<b>ONDY</b>		Revisions <table border="1"> <thead> <tr> <th>No.</th> <th>Description</th> <th>Date</th> <th>By</th> <th>Checked By</th> <th>Drawn By</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		No.	Description	Date	By	Checked By	Drawn By							Project Location: <b>CENTRAL COUNTY SOLID WASTE DISPOSAL COMPLEX</b> SARASOTA COUNTY, FLORIDA		Drawing No. 09201041.00 PHASES.dwg Scale: As Shown Date: 2/14/03 Sheet Number: 1	
No.	Description	Date	By	Checked By	Drawn By																

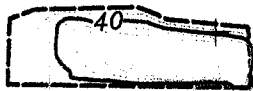
**SITE LOCATION**

**FOOD COMPOST FACILITY**  
 2/13/03 P.A. WINGLER, PE  
 PAGE NO. 1

P.A. Wingler  
 2/14/03



39.5  
X



39.4  
X

North  
↑  
1" = 100 FT

48.7  
X

275'  
Food Compost Area

54.6  
X

Cell #4

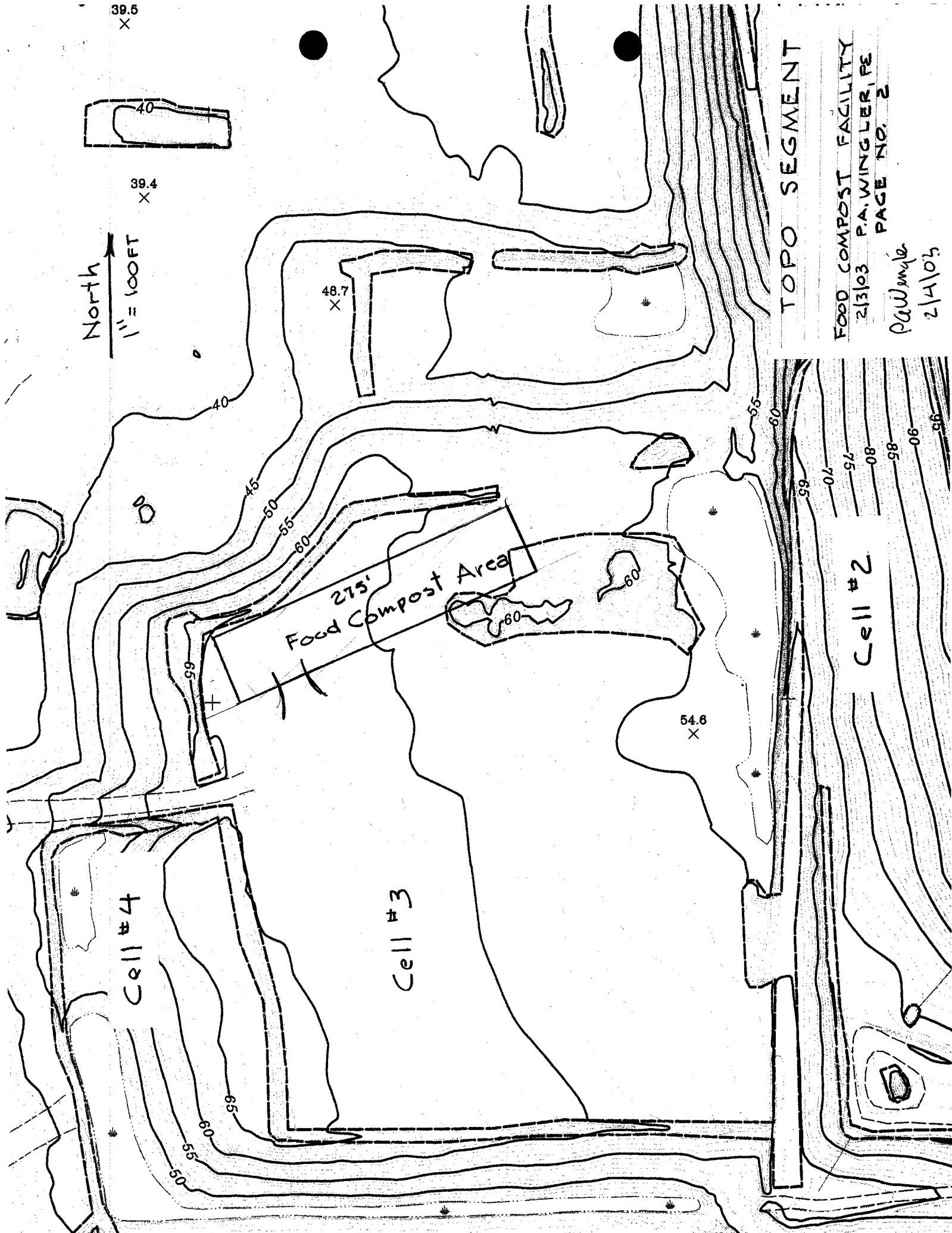
Cell #3

TOPO SEGMENT

FOOD COMPOST FACILITY  
2/3/03 P.A. WINGLER, PE  
PAGE NO. 2

PAWmyle  
2/4/03

Cell #2



1" = 30'

ACCESS RAMP

EARTH BERM

275'

SLOPE  
0.5%

10% SLOPE

SAMPLE  
BUCKET

24" x 24"  
PUSH STOP

25' x 50' CONC  
RECEIVING PAD  
9" SAMPLE COLLECTION  
CURB

AG BAG AREA

(4) BAGS 5' DIA (4'4" x 7' +/-)

25' x 50' x 6" CONC PAD  
ON 8" NO. 57 CONC.

6" MULCH FILL

TRENCH DRAIN  
3' x 3' x 50' NO. 57  
CONC. W/ GEO COVER

18" INTERMEDIATE  
COVER

TRENCH DRAIN  
(TYPE)

PROFILE (N.T.S.)

YARD PLAN

FOOD COMPOSTING FACILITY

DEC. 2002 P.A. WINGLER, P.E.  
REV 2-3-03

PAGE NO. 3

PAWINGLER  
2/14/03

2' earth berm on  
all sides

4" PVC sample  
outlet

6" conc. slab w/ 9"x6" conc. curb

8" #5 concrete stone

10 gal. sample  
bucket (to be  
emptied each  
morning)

bucket receiver  
w/ open bottom

2 Intermediate  
cover 2

## DETAILS

FOOD COMPOST FACILITY  
213103 P.A. WINGLER, PE  
PAGE NO. 4

P. A. Wingler  
2/4/03



**SARASOTA COUNTY**  
"Dedicated to Quality Service"

## **FACSIMILE**

To: *Kim Ford, P.E.*  
Affiliation: *FDEP*  
Facsimile number: *(813) 744-6125*

From: *Paul Wenzler, P.E.*  
Number of pages including this cover page: *6*  
*If all pages are not received, call the phone number at the bottom of this page.*

Subject: *Letter dated 2/4/03*  
Date: *2/4/03*  
Comments:

**SARASOTA COUNTY***"Dedicated to Quality Service"*

February 4, 2003

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Facsimile (813) 744-6125

Re: Central County Solid Waste Disposal Complex  
Food Composting Facility (FCF)  
Pending Permit No. 200819-001-SO, Sarasota County

Dear Mr. Ford:

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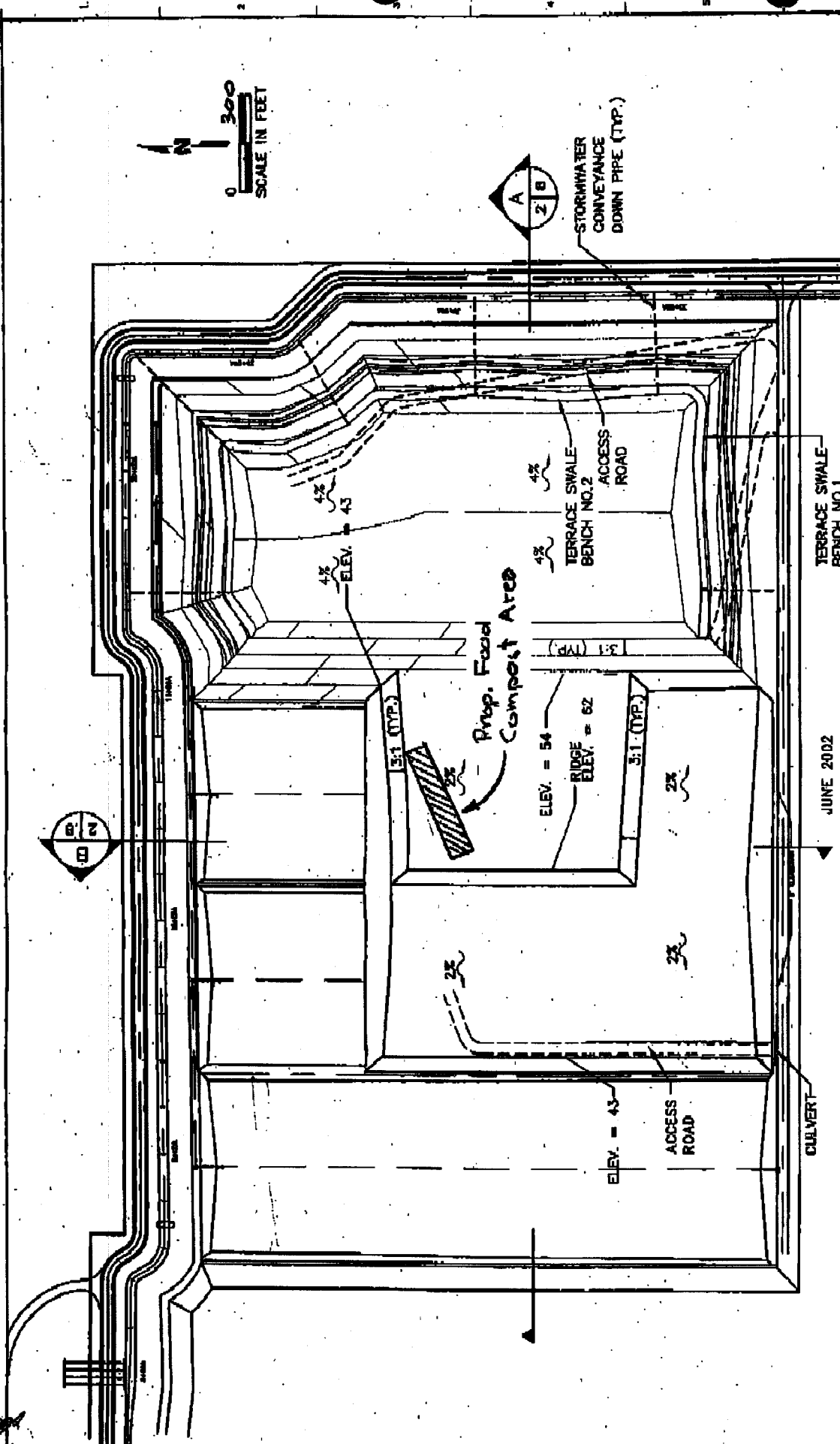
Paul A. Wingler, P.E.

*Interim Solid Waste Operations Manager*

**Attachments**

cc: Gerald L. Bennett, General Manager, Solid Waste  
Larry Alexander, Onyx Waste Services of Florida, Inc.  
Jean Nutter, Program Specialist  
Susan J. Pelz, P.E., FDEP - Tampa

\\FACSERV\DATA\CCW\02FEB\RED\m general\Central County Solid Waste Disposal Complex\FDEP\Kim Ford - food waste pending permit - 2-4-03.doc

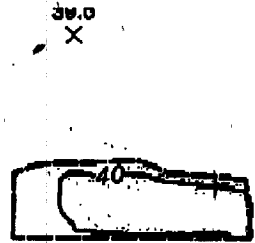


<div>SCS ENGINEERS 1101 W. US HWY 1, SUITE 100 WEST PALM BEACH, FL 33411 TEL: 561-833-1100 FAX: 561-833-1101</div>	<div><div>FONDY</div></div>	Revisions					Project Location		Project No.		Drawing No. 02020403.DWG
		No.	Description	Date	By	Check	Approved By	Date	Project Name	Sheet Number	
											1

# SITE LOCATION

FOOD COMPOST FACILITY  
 2/3/02 P. A. WINGLER, PE  
 PAGE NO. 1

P. A. Wingler  
 2/4/03



89.4  
X

48.7  
X

275'  
Food Compost Area

Cell #4

Cell #3

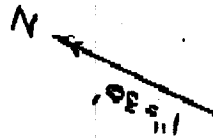
64.8  
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TOPO SEGMENT

FOOD COMPOST FACILITY  
2/3/03 P.A. WINGLER, PE  
PAGE NO. 2

PAW/myle  
2/4/03

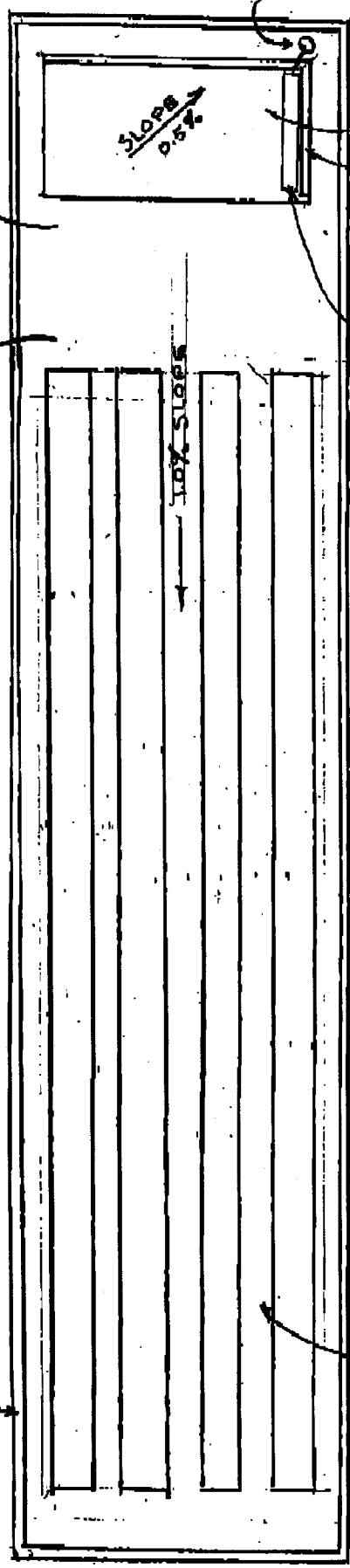
Cell #2



ACCESS RAMP

EARTH BERM

215'



SLOPE  
0.5%

10% SLOPE

SAMPLE  
BUCKET

29'x24'  
PUSH STOP

25'x50' CONC  
RECEIVING PAD  
3" SAMPLE COLLECTION  
CURB

AG BAG AREA  
(4) BAGS 5' DIA (4'x2'x1'x1')

25'x50' CONC PAD  
8'x8'x1' CONC

6" MULCH FILL

TRENCH DRAIN  
(TYPE)

18" INTERLAME ORATE  
COVER

TRENCH DRAIN  
3'x1'x1'x1'x1'  
CONC. W/ GEO COVER

PROFILE (FTS)

YARD PLAN

FOOD COMPOSTING FACILITY

DEC 2002 P. A. WINGLER, P.E.  
REV 2-3-03

PAGE NO. 3

PAULLING  
1/4/03



2' earth berm on all sides

4" PVC sample outlet

6" conc. slab w/ 9" x 6" conc. curb

2 Intermediate cover 2

8" #5 concrete stone

10 Gal. sample bucket (to be emptied each morning)

Bucket receiver w/ open bottom

# DETAILS

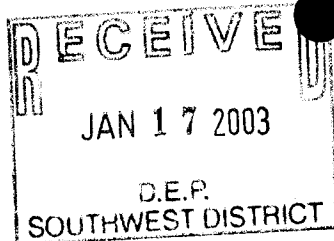
FOOD COMPOST FACILITY  
213103 P.A. WINGLER, PE  
PAGE NO. 4

P. Wingler  
2/4/03



## SARASOTA COUNTY

"Dedicated to Quality Service"



January 13, 2003

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Facsimile (813) 744-6125

Re: Central County Solid Waste Disposal Complex  
Food Composting Facility (FCF)  
Pending Permit No. 200819-001-SO, Sarasota County

Dear Mr. Ford:

Thank you for your preliminary review of my letter and documents of December 12, 2002.

There has been a proposed relocation of the facility at Cell No. 3. The area considered is in an active segment of Cell No. 3 which should further simplify the issue of leachate and storm water management.

I believe that the proposed project has advanced significantly so that your original questions can be addressed to your satisfaction. As previously stated, the FCF will not interfere with the operation of the landfill or impact the fill sequencing plan. Our schedule indicates that the FCF operation will be completed prior to the return of waste filling activities.

**Item 1 (62-701.300)**

The stated prohibitions will not be violated during the operation of the FCF.

**Item 2 (62-701.320)(8)**

The requested, notice of publication was faxed to your office November 20, 2002.

**Item 3 (62-709.500)(1)**

As per our plan, the Mixing Pad will be poured concrete over a crushed concrete base. The Concrete Mixing Pad will be ideally suited to the operation. The Compost Area, or Ag Bag Area, will be on a bed of mulch capable of percolating leachate/ storm leachate into the normal landfill leachate management system. After composting is complete, the Compost Area will, in effect, become the Curing Area. The Ag Bags will be split open, the previously restraining geo membrane containment will be laid out and the surface will provide a Curing Area floor for the collection of any liquids from/or through the compost.

The mulch bed comprising the Composting Area/Curing Area will provide an adequate working surface for the loading and operation of the Ag Bag filling equipment.

**Item 4 (62-709.500)(2a & b)**

The construction details for the berms, flooring, leachate management, site elevations, profile, sample collection chamber, piping, and related appurtenances are included in the design plan.

**Item 5 (62-709.500)(3)**

Storm water collected within the work area will be treated as leachate.

**Item 6 (62-709.500)(4f)**

Two pressurized water trucks with hoses are at the site and will be made available for interim fire control awaiting equipment from the local fire control unit.

**Item 7 (62-709.500)(5c)**

A description of prohibited materials is addressed in the FCF Operations Plan.

**Item 8 (62-709.500)(5g)**

Aside from storm water management (design plan) all other aspects of the operation are described in the FCF Operations Plan.

**Item 9 (62-709.500)(7a)**

The Mixing Pad will be of poured concrete in order to facilitate the operation and housekeeping.

**Item 10 (62-709.500)(7b)**

The entire work area; Mixing Pad, Compost Area, and Curing Pad will all be located on a active portion of Cell No. 3 and all associated liquids, condense, wash down, and storm water will be treated as leachate. The leachate will percolate into the normal leachate management system.

**Item 11 (62-709.510)**

The FCF will be operated in compliance with the rule. The name, address, contact phone number of all persons to be contacted in the event of an emergency or implementation of contingency plans are included in the FCF Operations Plan.

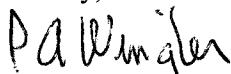
**Item 12 (62-709.530)**

All issues of this rule will be conducted to the Department's satisfaction in compliance with your review of the Operations Plan.

As you previously requested, a meeting will be scheduled at your office at your earliest convenience and all engineering aspects of the project can be reviewed and incorporated into the construction plans.

If you have any questions, please contact me directly at (941) 861-1578.

Sincerely,



Paul A. Wingler, P.E.

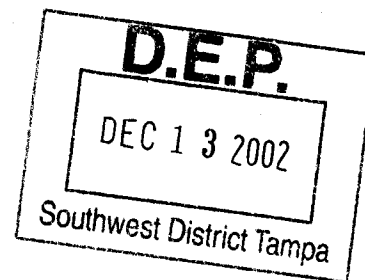
*Interim Solid Waste Operations Manager*

cc: Gerald L. Bennett, General Manager, Solid Waste  
Jean Nutter, Program Specialist  
Susan J. Pelz, P.E., FDEP - Tampa  
Jesse White, Resource Management Group, Inc.



## SARASOTA COUNTY

*"Dedicated to Quality Service"*



December 12, 2002

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Re: Central County Solid Waste Disposal Complex  
Food Composting Facility (FCF)  
Pending Permit No. 200819-001-SO, Sarasota County

Dear Mr. Ford:

As discussed, we have decided to locate the Food Composting Facility (FCF) on the active Cell No 3 of our Class I waste disposal operation. Our primary objective is to reduce the impact of issues associated with FCF leachate management. The FCF will not interfere with the landfill operation or impact the fill sequencing plan. Per plan, fill is in progress at the north end of Cell 3 and the FCF operation will be terminated prior to the return of related filling activities in late 2003.

The following support data is provided:

- Page 1 Fill Sequence Plan, Sheet 1 (June 2002)
- Page 2 Process Yard Plan (signed & sealed)
- Page 3 Details (signed & sealed)
- Page 4 Topo Segment, June 2002

### **Receiving Pad Area**

In general the plan is to construct an earth berm enclosing the area. The berm will extend down to the top surface of the previously covered waste. (See Page 3) The interior of the bermed area will contain approximately 8" of cover over the original buried waste. A poured concrete pad will be constructed within the bermed area. The slab will be sloped and have a combination "Push Curb," which will also capture sample leachate from the pad. The area beyond the pad, and the berm will be filled with a mulch layer. Soiled mulch will be periodically collected and incorporated into the process and the affected areas will be replenished with fresh mulch. Captured leachate will be collected and analyzed.

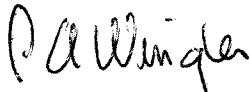
### **Ag Bag Area**

A berm arrangement similar to the Receiving Pad area will be provided with sufficient space to contain four 5 ft diameter x 200' long Ag Bags. Leachate samples will be extracted from the bags for analysis during the aging process.

When the Ag Bag curing process is complete the bags will be slit and folded back from their contents. The material will remain in place as a floor during the static curing period. The plastic bottom of the "peeled" Ag Bags will remain in place, providing a means of sampling potential leachate.

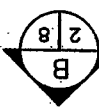
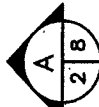
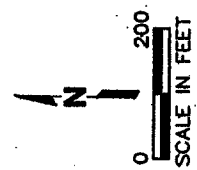
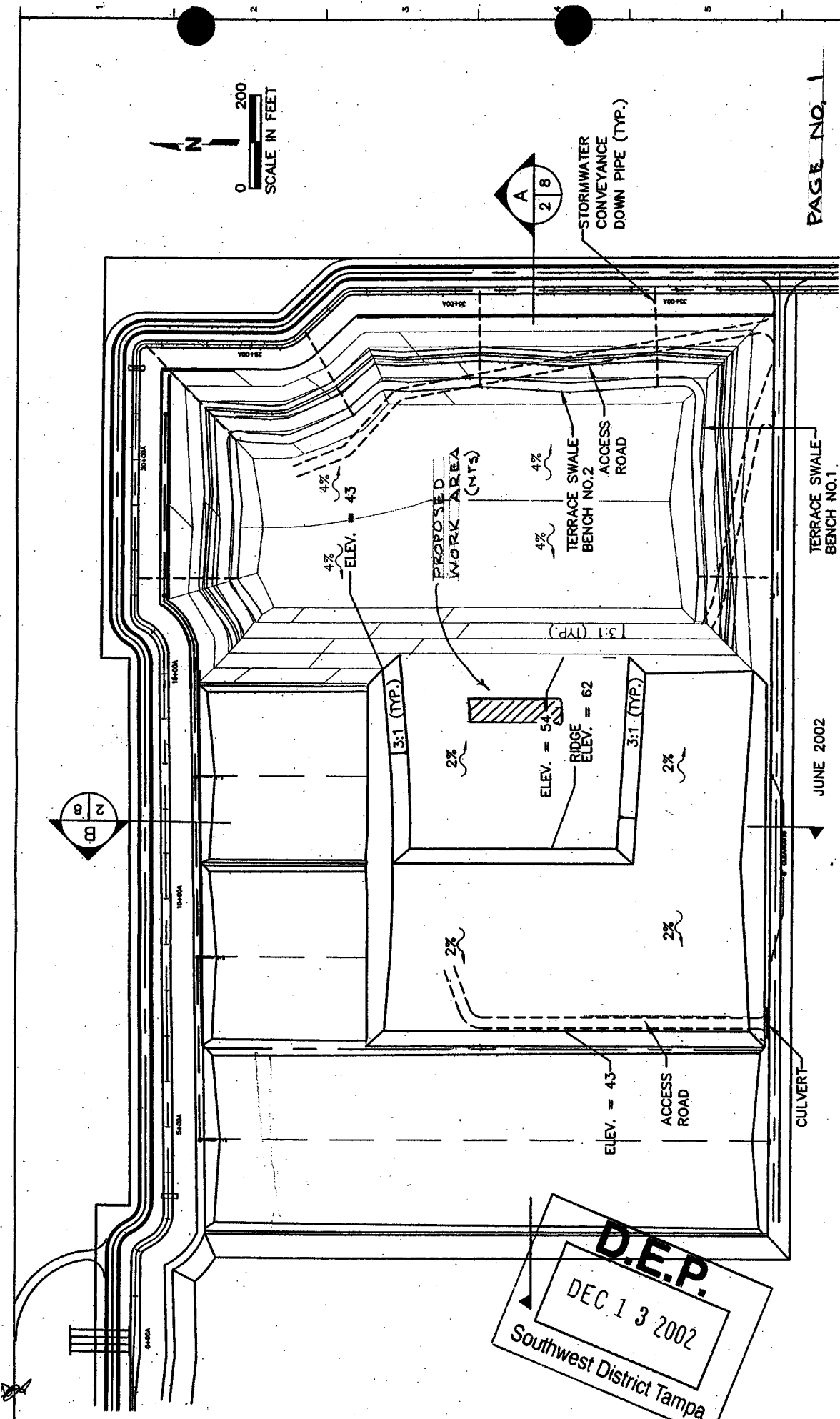
Other than collected samples, all leachate will percolate into the underlying Class I waste and enter the normal landfill leachate collection and management system.

Sincerely,



Paul A. Wingler, P.E.  
*Project Manager*

cc: Gary Bennett, Interim General Manager for Solid Waste  
Jean Nutter, Program Specialist  
Jesse White, Resource Management Group, Inc.



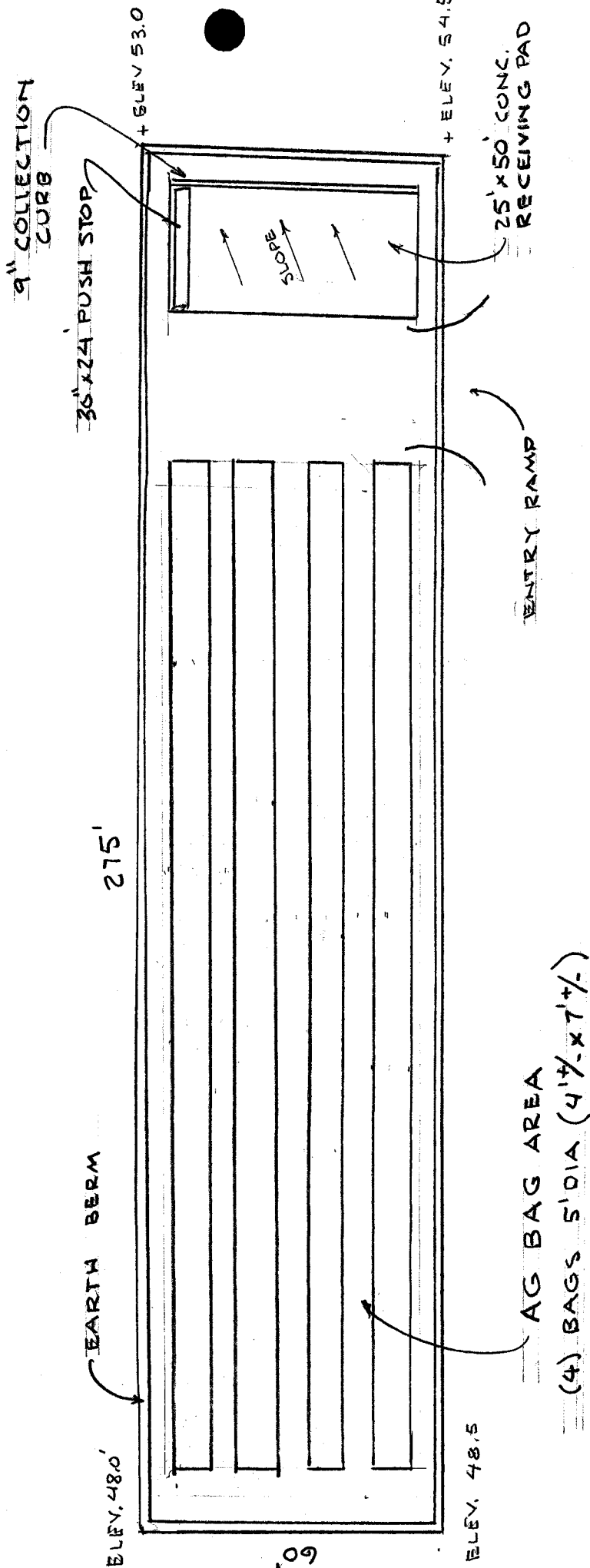
PAGE NO. 1

JUNE 2002

**D.E.P.**  
DEC 13 2002  
Southwest District Tampa

<div>SCS ENGINEERS STEARNS, CONRAD AND SCHMITZ CONSULTING ENGINEERS 1111 N. W. 11th Ave., Suite 200 Ft. Lauderdale, FL 33304-3337</div>										<div>ONDY</div>										<div>Revisions</div> <table><thead><tr><th>No.</th><th>Description</th><th>Date</th><th>By</th><th>Checked By</th><th>Drawn By</th></tr></thead><tbody><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr></tbody></table>										No.	Description	Date	By	Checked By	Drawn By																																																													<div>Project Location</div> <div>COUNTY, FLORIDA</div> <div>WASATCH COUNTY, FLORIDA</div> <div>SPRING VALLEY, FLORIDA</div>										<div>Approved By</div> <div>JCS</div> <div>Checked By</div> <div>JCS</div> <div>Drawn By</div> <div>JCS</div>										<div>Drawing No.</div> <div>08201041.00 PHASES.dwg</div> <div>Date</div> <div>06/01/02</div> <div>Author</div> <div>JCS</div> <div>Checker</div> <div>JCS</div> <div>Plotter</div> <div>JCS</div>										<div>Sheet Number</div> <div>1</div>									
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NORTH  
1" = 30 FT



P. A. Winkler  
P.E.  
12/12/02

# YARD PLAN

FOOD COMPOSTING FACILITY

DEC. 2002 P.A. WINKLER, P.E.

EXIST. LANDFILL  
COVER

2' EARTH BERM

MULCH FILL

4" CONC. MIX PAD

4" CRUSHD CONC BASE

EXIST. WASTE STRATA

BERM DETAIL  
NTS

RECEIVING PAD 2

LEACHATE COLLECTION  
CURB

COLLECTION  
SUMP

RECEIVING PAD LEACHATE  
COLLECTION  
NTS

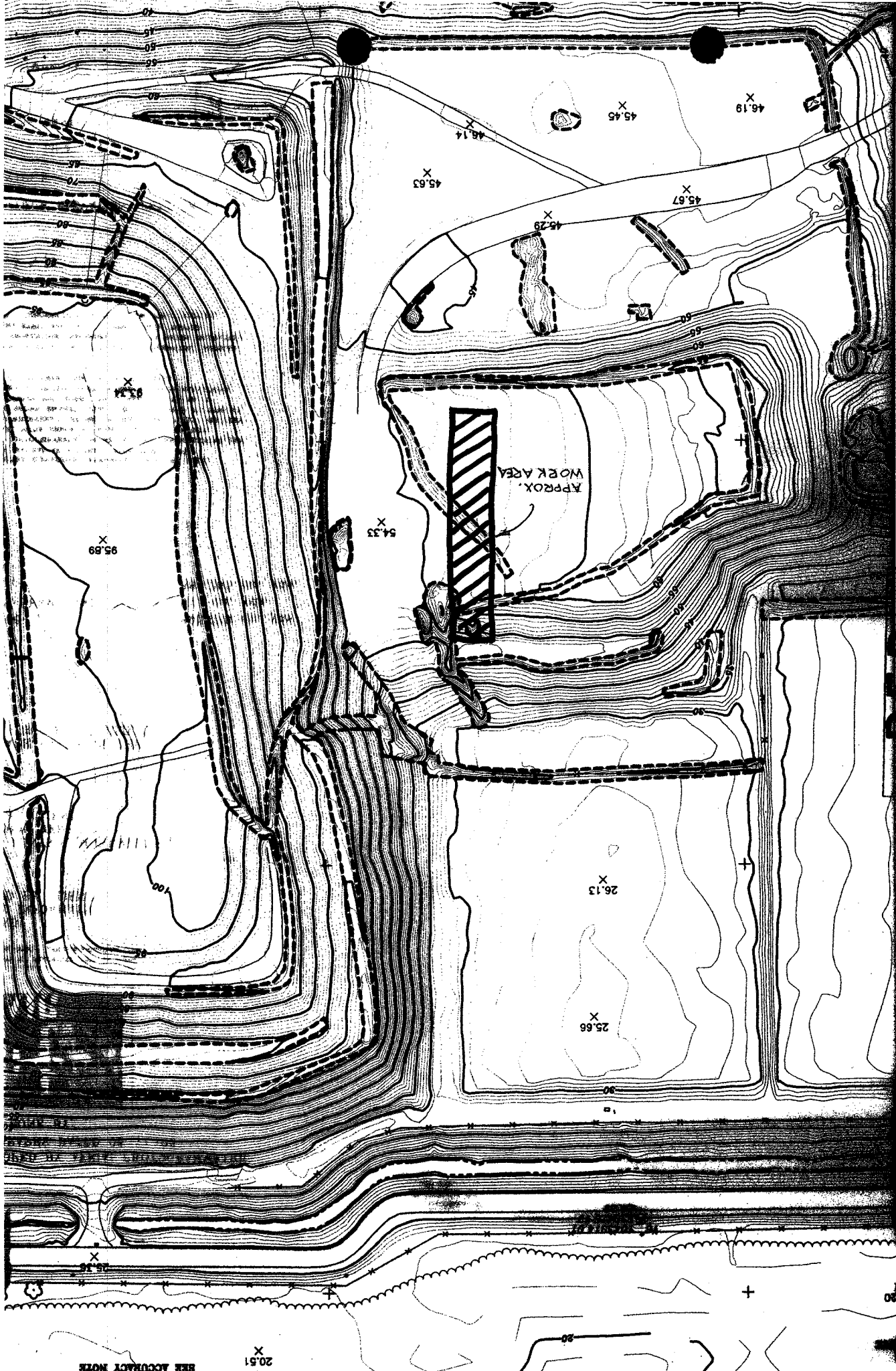
DETAILS

FOOD COMPOSTING FACILITY  
DEC. 2002 P.A. WINGLER, PE

PAGE NO. 3

for  
P. WINGLER  
12/3/02  
PE 12/3/02





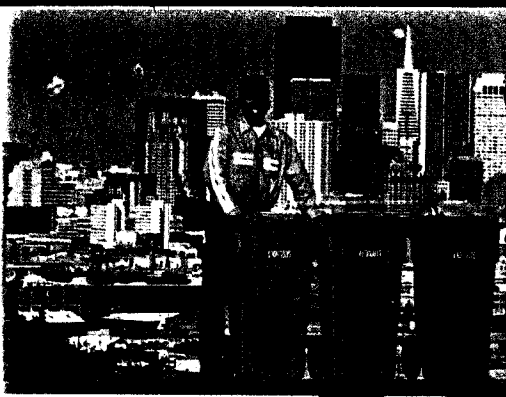
TOPO SEGMENT  
CELL 3  
JUNE 2002  
PAGE 4

D.E.P.

DEC 13 2002

Southwest District Tampa

DENSE TREES  
SEE ACCURACY NOTE



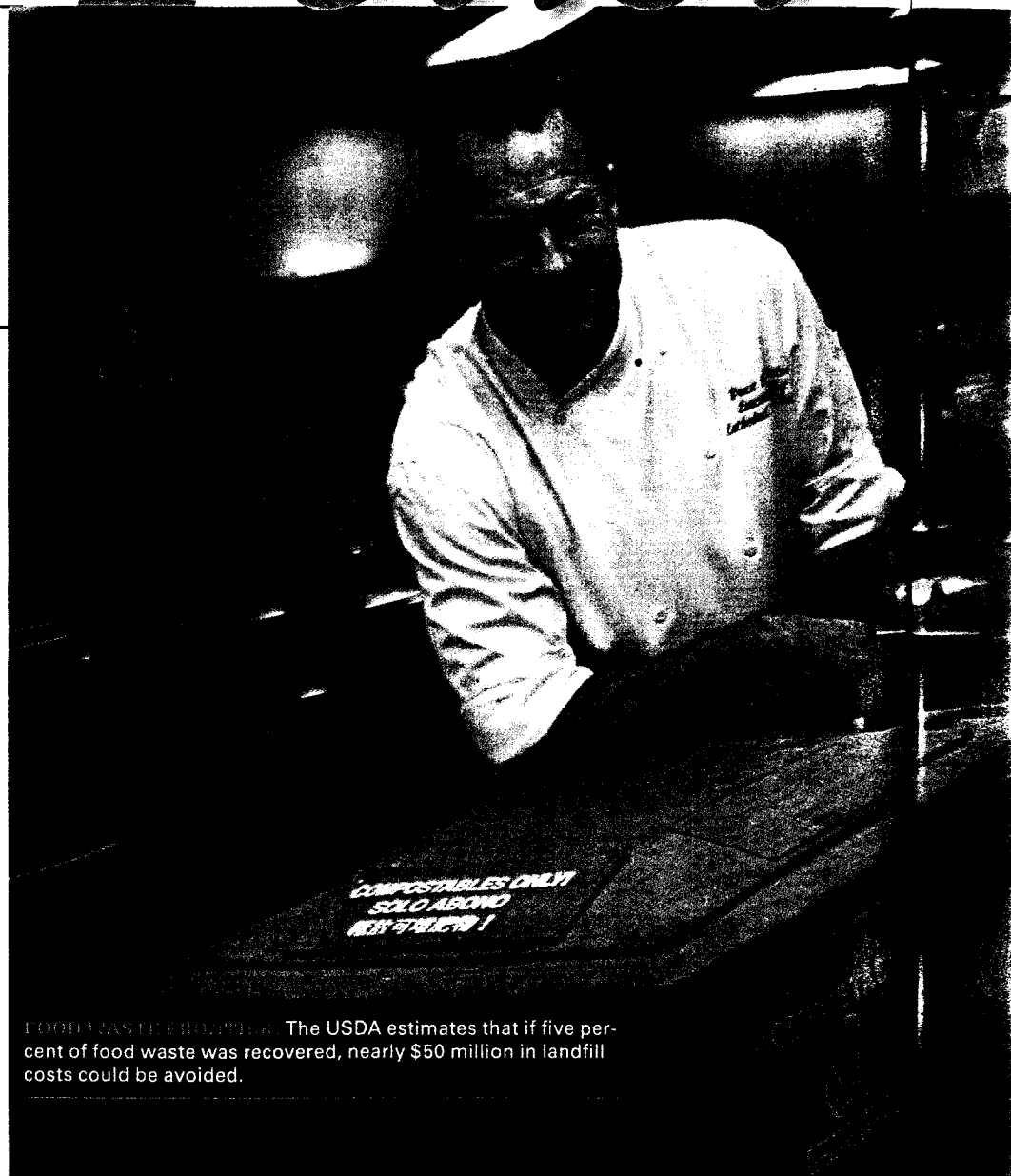
# A Moveable Feast

**The growing food waste stream is becoming a hefty problem, but a few enterprising communities are doing something about it.**

**A**mericans are eating more than ever, and our waistlines are expanding in kind. As a result, the amount of food waste sent to landfills also is expanding. According to the U.S. Environmental Protection Agency (EPA), Washington, D.C., more than 25 percent of the food we eat, or about 96 million pounds of food per year, goes to waste. The nation spends about \$1 billion a year to dispose of food waste, the EPA estimates.

Recovering food waste has many universally accepted benefits, including avoided collection and disposal fees; providing food to needy people or for use in compost or animal feed; helping meet waste reduction goals; and sustaining local recycling infrastructures. Successful food diversion programs have

By Kim A. O'Connell



**FOOD WASTE DIVERSION** The USDA estimates that if five percent of food waste was recovered, nearly \$50 million in landfill costs could be avoided.

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recovered up to 100 percent of their food discards and have reduced their overall solid waste generation by up to 85 percent, according to EPA case studies. Yet food waste recovery has not grown the way other recycling initiatives have.

There are many challenges to recycling food waste. In a recent report, the Center for Ecological Technology, Northampton, Mass., delineated the main barriers to food waste diversion: a lack of availability of hauling and processing; low-quality, contaminated feedstock; lack of support from local and state governments; and the difficulty in handling wet, heavy and odorous material.

Although the report focused on the Boston area, the barriers are universal. And with no easy solution available, many cities continue to landfill food scraps. Still, some municipalities have taken the lead in instituting food waste recycling programs.

### Apple & Orange Comparisons

A key aspect of the food waste dilemma is the incomplete understanding of how much exists. Food scraps generated during the preparation of packaged food products, for example, are not included in the EPA's annual report on the characterization of solid waste. For this report, food scraps are estimated using data samples from various regions combined with demographic information. Adding to the confusion, the EPA admitted that previous reports of food waste generation included composted materials such as paper and industrial food wastes.

With improved data sources, the EPA estimates that, in 2000, food scrap generation topped out at 25.9 million tons, representing about 11 percent of all municipal solid waste (MSW) generated that year. Approximately 370,000 tons of MSW food waste was composted. While recovery of yard trimmings, the other

major aspect of organic materials, has grown dramatically, food waste recovery has not substantially increased. Yet food waste clearly is growing.

An ongoing study by the U.S. Department of Agriculture (USDA), Washington, D.C., and the University of Arizona, Tucson, is challenging the EPA's numbers. The study examined the food habits of 280 Tucson-area families and determined that Americans throw away 474.5 pounds of food waste per person per year, higher than an early estimate that put per-capita food waste disposal at 156 pounds annually. Yet the study's main researcher admits that households handle food waste differently, so questions remain as to whether extrapolating the Tucson numbers is the best reflection of nationwide trends. The study is continuing into 2003.

### Recovery Recipes

Despite the overall sluggishness of this market,

successful food waste recovery programs realize benefits in avoided waste disposal costs. A report from the USDA Economic Research Service says that if 5 percent of food discards in 1995 were recovered, about \$50 million in landfill disposal costs could have been avoided that year.

The EPA touts the relatively low start-up costs of a food recovery or composting program, which vary depending on an establishment's equipment and collection programs. Composting fees, the agency points out, typically are less than trash disposal fees. And some end-users, such as food banks or renderers (which convert fats or meat products for use in cosmetic or other products), will assume the cost of picking up food wastes. Yet local laws vary widely, and this can affect which regions and municipalities will have the most cost-effective programs.

Like its general source-reduction to recycling hierarchy, the EPA has suggested a food waste reduction hierarchy that begins with feeding excess food to people and then to animals, followed by recycling and composting, and then disposal as a last resort. Markets for compost are growing, but this, too, is slow and hampered by many challenges. For instance, agriculture presents the largest potential end-use for compost, but chemical fertilizers still have a lock on the market.

Food recovery sent to needy organizations, also known as "gleaning," is the preferred method of dealing with food waste, similar to "reuse" of any other recyclable commodity. The USDA has taken the lead on promoting food recovery programs, which include collecting harvested crops, salvaging perishable produce, and collecting processed foods with long shelf lives. The USDA estimates that roughly 49 million people could be fed each year with food that now is being sent to landfills.

Although it has no hard numbers on the amount of food waste generated by restaurants, the National Restaurant Association, Washington, D.C., has urged its members to make their operations more environmentally sound, which includes reducing food waste. The association encourages composting food scraps or using them for animal feed, as well as separating waste oil for rendering.



Food Recovery

## San Francisco Treats

The city by the Bay, San Francisco remains the unmatched leader in collecting and recycling its food residuals. In 2001, the city had collected and composted nearly 40,000 tons of food waste and other compostables from more than 62,000 households and 1,500 food-related businesses such as restaurants and hotels. As one of the nation's most dense and diverse cities, San Francisco is a model for other communities that say the outreach for such an aggressive

bles and green for organics. Norcal has helped to develop educational materials for the city's diverse residents, including photo-heavy brochures and materials in Chinese, Spanish and other languages. The average diversion rate with the new program is 45 percent.

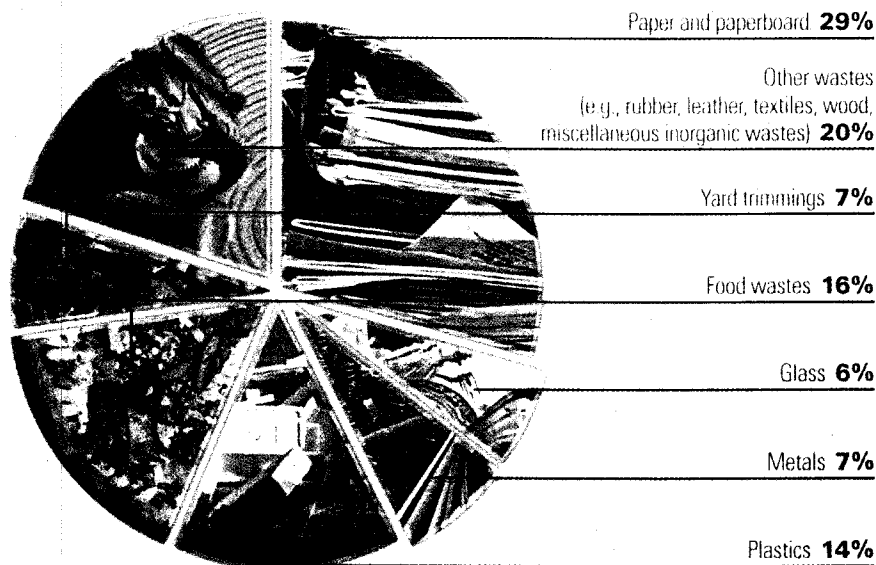
Golden Gate Disposal and Recycling, another Norcal subsidiary, and Sunset Scavenger also are using the three-cart program in the commercial sector. According to company spokesman Robert Reed, some city skyscrapers are

adds that compost from the program recently has been used in Napa Valley vineyards.

The key is to be aggressive in searching for end-users. "We are putting compost on organic farms, traditional farms, commercial nurseries, orchards, vineyards and so on," Reed says. "This country grows a lot of food, and there are a lot of farms, and there are concerns about soil depletion and the need to recondition and improve soils. The better the compost, the better the market." Food waste is essential to good compost, he adds.

### DISCARDED WASTE

(in percent of total generation and discards)



Source: U.S. EPA, 2000

### Automatic Pilot Programs

Building on San Francisco's success, other communities have started pilot programs to boost food waste recovery. In King County, Wash., for example, 1,700 households in four cities are participating in a food-waste pilot program. Over the nine-month program, which began in April, the city is expecting to send nearly 325 tons of organic waste to a local composting facility.

One participating city, Lake Forest Park, is trying an alternating collection system in which trash is collected one week and yard trimmings and food waste are collected together the next. In the other three cities, Issaquah, Kirkland and Redmond, food waste and yard trimmings are collected weekly, as is trash.

"The next frontier for recycling is food waste," says Josh Marx, King County Solid Waste Division's organics program manager. "We're estimating that it represents 30 to 40 percent of the single-family household waste stream. Food waste has tremendous opportunity. There are certainly challenges, but we thought, 'why not be leaders and get it done?'"

Because materials are collected every two weeks, the county has provided Lake Forest Park residents with a "compostainer," an aerated food waste container. There, the county is finding participation to be higher than it is in the other three cities, yet food waste collection still is relatively low. "We've done some waste sorts, and we've found that about 15 percent of what is being sent to the composting facility is food and soiled paper," Marx says. "It's still a small amount of the total." Neverthe-

program is too daunting or the costs too prohibitive.

The city operates under the California law requiring 50 percent waste diversion. But San Francisco faced a particular challenge in recovering organic waste because its urban core has so few yards. Without yard trimmings, which form a high percentage of most recycling programs, the city knew it had to increase food waste recovery. A waste characterization study found that only 5 percent of the city's waste was yard trimmings, but 19 percent was food waste.

After implementing a successful pilot program, the city in 1998 began working with Sunset Scavenger Co., a subsidiary of Norcal Waste Systems, San Francisco, on a three cart collection program. Households and businesses receive three color-coded carts for waste materials — black for unrecyclable trash, blue for recycla-

boasting recovery rates of up to 75 percent. Already, the program has expanded to nearby Oakland, where approximately 60 restaurants are participating.

Clearly, a recycling mandate and an educated citizenry help. "We have a strong recycling and environmental ethic here in San Francisco, and it's an ethic shared by residents, businesses, city officials and employees of this company," Reed says. This support has helped customers to swallow the rate increases associated with the new program. Reed points out that the collection rate of just more than \$16 still is far less than typical collection rates in other Bay areas.

The program also has literally closed the loop. Reed says that food scraps collected from local restaurants have been turned into compost and used in area farms, which grow the produce that is used by some of those same restaurants.

less, contamination has been minimal, Marx adds.

The most common complaints from residents have been that they wanted to pay less for trash service and wanted bigger containers — both items that could be addressed in a citywide program, Marx says. Looking ahead, the county is hoping to continue the food waste program in the participating cities and expand it to other areas and into the commercial sector.

In Minnesota, the state Office of Environmental Assistance (OEA), St. Paul, has spearheaded food waste recovery as well. The state estimates that food-related businesses are recycling nearly 250,000 tons of food waste per year through food banks and food-to-live-stock programs. Food-to-livestock programs quadrupled in the 1990s, growing from just more than 6,000 tons in 1991 to 135,000 tons in 1997.

This growth can be partially attributed to the state's aggressive pilot programs and educational outreach. In its own office, the OEA has switched to compostable foodware for all corporate functions and bought food in bulk to minimize waste. The organization has an in-office composting bin, with posters alerting workers to which items can be composted. The OEA also has awarded a grant to Hutchison, Minn., to underwrite its food waste recovery pilot project. The city reported that as of May 1998, participation in the curbside

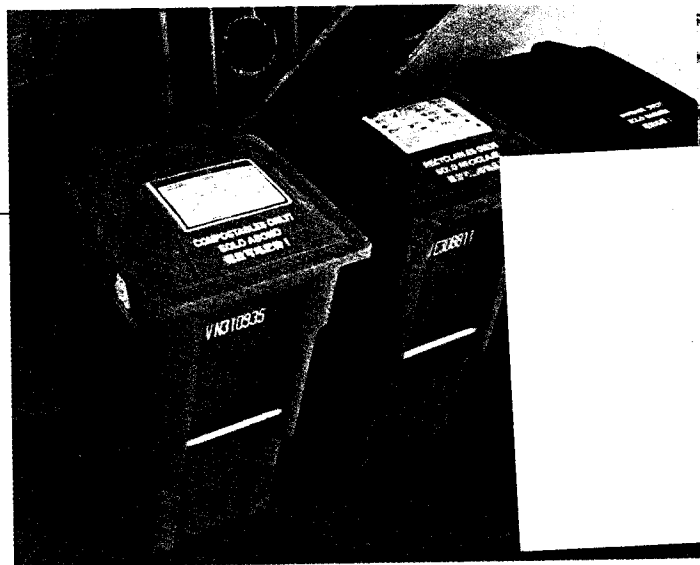
**THREE'S A CHARM:**  
San Francisco residents dispose of food waste, recyclables and trash in three color-coded bins.

collection program, in which citizens put food and yard waste in a specially marked container, stood at 65 percent, with few contamination problems.

### Organically Driven

Although state recycling mandates and citywide recycling initiatives have proven valuable in boosting food waste recovery, Texas is showing that food waste recovery also can grow from the ground up. Although the Texas Commission on Environmental Quality, Austin, has overseen several successful food waste recovery and composting demonstration projects, particularly in the state prison system, at least one private facility is saying that free enterprise is the key to successful food waste recovery.

Silver Creek Materials owns a composting facility in Fort Worth that has made a name for itself by installing an engineered pad for crushing packaged beverage waste. Expired beer and soda come from distributors throughout the Dallas-Ft. Worth area to provide much-needed moisture for the composting



operation. Although wood waste is a chief component of the compost, the operation also relies on a local food supplier that brings in three truckloads a day of vegetables, primarily melon rinds. Silver Creek recycles about 20,000 cubic yards of food waste per year.

The lack of mandates is a help, not a hindrance, to the operation, says Bart McKay, chief operations officer for Silver Creek. "It's strictly on a free enterprise basis," he says. "I think we'll see more and more food waste being brought to us, because landfills are calling this special waste, which drives the tipping fee up. We charge \$3 a cubic yard."

McKay adds that recovery facilities should focus on networking to find out potential sources of food and beverage waste. "Free enterprise will take care of itself," he says. "The food waste comes to us. It creates a great environment in which to operate."

Clearly, successful recycling always will depend on educated and committed participants, businesses and government officials. This is especially true when it comes to food waste. For a commodity that is so essential to our existence, it is time we paid more attention to food's final destination.

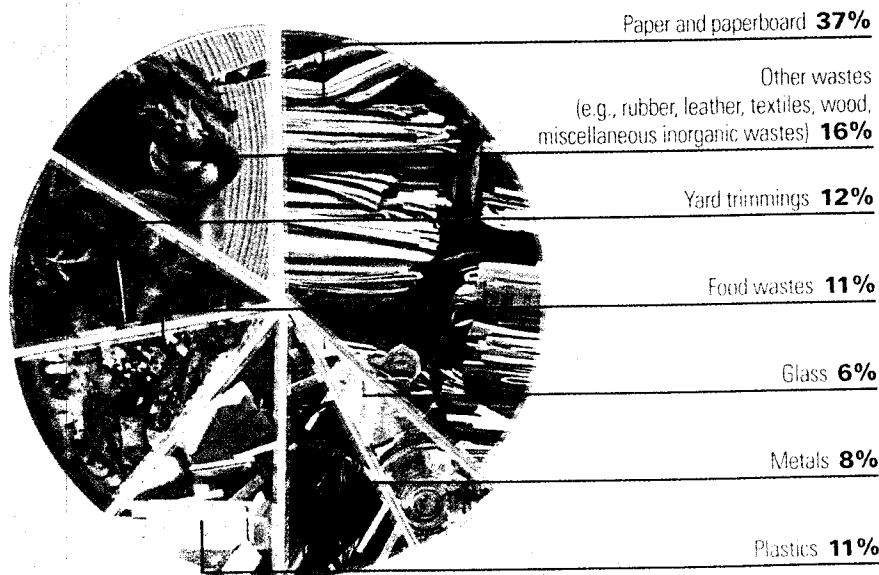
"We've demonstrated that it can be done," says Norcal's Robert Reed. "Not only can you increase recycling [by collecting food waste], you also can include composting for people who want to do it in a simple and effective way. It's a great way to increase recycling, it produces a useful product and you can truly close the recycling loop."

Kim A. O'Connell is a contributing editor based in Arlington, Va.

Photos courtesy of Norcal Waste Systems.

## GENERATED WASTE

(in percent of total generation and discards)



Source: U.S. EPA, 2000

Ford, Kim

---

**From:** Claudette Cobb [CCOBB@co.sarasota.fl.us]  
**Sent:** Wednesday, November 20, 2002 5:07 PM  
**To:** Ford, Kim  
**Cc:** Gary Bennett; Paul Wingler  
**Subject:** State of Florida DEP Notice of Application for Food

Mr. Ford,

Attached is Sarasota County's Ad for the State of Florida DEP Notice of Application for the Food Composting Facility. Please let me know if you need more information.

Claudette Cobb  
Environmental Services Business Center  
Solid Waste Operations  
(941) 861-1572

SARASOTA HERALD-TRIBUNE  
PUBLISHED DAILY  
SARASOTA, SARASOTA COUNTY, FLORIDA

STATE OF FLORIDA

COUNTY OF SARASOTA

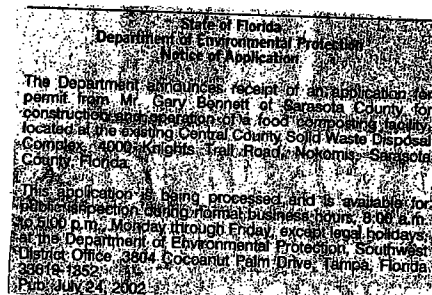
SARASOTA HERALD TRIBUNE

SOLID WASTE OPERATIONS  
4000 KNIGHTS TRAIL ROAD  
CLAUDETTE COBB  
NOKOMIS, FL 45375

REFERENCE: 60031531  
7NBC00800 STATE OF FLORIDA DE

Before the undersigned authority, personally appeared Moya Neville, who on oath says she is the Advertising Director of the Herald-Tribune, a daily newspaper published at Sarasota, in Sarasota County, Florida; that the attached copy of advertisement, was published in said newspaper on the dates listed.

Affiant further says that the said Herald Tribune is a newspaper published at Sarasota, in said Sarasota County, Florida, and that the said newspaper has heretofore been continuously published in said Sarasota County, Florida, each day and has been entered as periodicals matter at the post office in Sarasota, in said Sarasota County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



PUBLISHED ON: 07/24

TOTAL COST: 72.00  
FILED ON: 07/24/02

AD SPACE: 36 LINE

SWORN TO AND SUBSCRIBED BEFORE ME THIS 24th DAY OF July A.D., 2002 BY  
MOYA NEVILLE WHO IS PERSONALLY KNOWN TO ME.

SEAL

OFFICIAL NOTARY SEAL  
BOBBIE J CLARK  
NOTARY PUBLIC STATE OF FLORIDA  
COMMISSION NO. CC968394  
MY COMMISSION EXP. OCT. 11 2004

NOTARY PUBLIC

**Ford, Kim**

---

**From:** Pelz, Susan  
**Sent:** Tuesday, October 29, 2002 4:34 PM  
**To:** Ford, Kim  
**Subject:** FW: Food Recovery Project

fyi

-----Original Message-----

**From:** Boroff, Suzanne  
**Sent:** Tuesday, October 29, 2002 4:31 PM  
**To:** Pelz, Susan; Clark, Jan Rae; Joyal, Francine  
**Subject:** FW: Food Recovery Project

This is the response I got from the e-mail sent to Tom Keith.

-----Original Message-----

**From:** Gary Bennett [mailto:GBENNETT@co.sarasota.fl.us]  
**Sent:** Tuesday, October 29, 2002 3:48 PM  
**To:** Boroff, Suzanne  
**Cc:** Jean Nutter; Paul Winger; jwhite@recyclesmart.com  
**Subject:** Food Recovery Project

Suzanne,

Tom Keith has left the County and I am overseeing the development of this project. We are putting together a new approach and will do the composting on the active part of our Class I landfill. We have received favorable comments from Tampa FDEP on this approach and will submit something in writing to those folks shortly. We are also working on a revised workscope and plan to send to you all shortly. It is our intent to proceed with the grant and complete the work outlined previously, though the approach has changed somewhat.  
If you have questions please call me at (941) 861-1571.

Thanks  
Gary



**Ford, Kim**

---

**From:** Pelz, Susan  
**Sent:** Tuesday, October 29, 2002 12:46 PM  
**To:** Ford, Kim  
**Subject:** FW: Sarasota Innovative Grant IG1-14

fyi

-----Original Message-----

**From:** Boroff, Suzanne  
**Sent:** Tuesday, October 29, 2002 12:33 PM  
**To:** 'tkeith@co.sarasota.fl.us'  
**Cc:** Henricks, Ron; Clark, Jan Rae; Joyal, Francine; Pelz, Susan; 'White, Jessie'  
**Subject:** Sarasota Innovative Grant IG1-14

Dear Tom,

Thank you for taking time out of your schedule to meet with Ron, Peter and myself regarding your concerns about continuing with the Food Recovery Project. I hope the meeting we had in Tallahassee on Oct. 8th and the one you had in Sarasota on Oct. 10th with Francine provided some food for thought and forward progress on the Food Recovery Project. I believe the District office will look favorably upon using an temporarily closed landfill cell as the project site.

Have any decisions been made on your part as to whether you plan to continue with the grant? Any idea when a revised permit application will be presented to the District? The vermicomposting component of the project will need a re-work as well. We (FDEP) would really like to see this project succeed. Hopefully, I will receive a revised scope of service, timeline and budget in the near future and I am looking forward to continuing to work with you on this project.

Sincerely,

Suzanne Boroff  
Florida Department of Environmental Protection  
Waste Reduction Section, Recycling Program  
2600 Blair Stone Rd., MS 4570  
Tallahassee, FL 32399-2400  
Phone: 850/245-8717 SUNCOM: 205-8718 Fax 850/245-8803  
suzanne.boroff@dep.state.fl.us

*Suzan* 10/31/02

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 10/25/02  
Time 11 AM

Subject "Temporary" Compost Area  
Permit No. \_\_\_\_\_  
County SARASOTA  
Telephone No. \_\_\_\_\_

M Paul Winger

Representing SARASOTA County

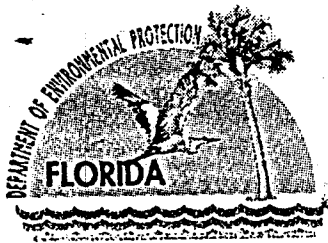
☒ Phoned Me    ☐ Was Called    ☐ Scheduled Meeting    ☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting \_\_\_\_\_

Summary of Conversation/Meeting PW RETURNED my call  
PW says HE HAS A CURRENT topo AND WILL  
SHOW THE LAYOUT ON IT  
I ASKED FOR HIM TO SHOW  
1) SEEM AROUND IT - PW says WILL BE 2-3' HIGH  
ON CTD 3  
2) EMERGENCY AREA ABOVE LERS -  
3) NO CONFINED SPACES, IN HIS PUMPS ETC  
4) A WAY TO COLLECT COMPOST WATER -  
WE DISCUSSED TIME FRAME  
PW SAYS WILL BE ABOUT 9 MONTHS  
I ASKED HIM TO EXPLAIN THAT IN HIS LATER  
(WITH THE TOPO & LAYOUT) AND EXPLAIN WHY IT  
WILL NOT INTERFERE W/ NORMAL OPERATIONS

(continue on another  
sheet, if necessary)

Signature *[Signature]*  
Title \_\_\_\_\_



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

July 16, 2002

Mr. Gary Bennett  
Sarasota County  
4000 Knights Trail Road  
Nokomis, FL 34275

Re: Food Composting Facility  
Pending Permit #200819-001-SO, Sarasota County

Dear Mr. Bennett:

This is to acknowledge receipt of your permit application for the food composting research/demonstration/development project to be located at the existing CCSWDC.

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 [Chapters 62-701 and 62-709, Florida Administrative Code (F.A.C.)]. Please provide:

1. 62-701.300. Please provide information which indicates that each of the prohibitions will not be violated during operation of the facility. *Activity will be on the landfill.*
2. 62-701.320(8). Please publish the attached Notice of Application and provide proof of publication to the Department. *Publication was provided on November 20, 2002.*
3. 62-709.500(1). Specifications for all construction materials are requested, including but not limited to: 1) the "crushed concrete" to demonstrate that it will be impervious and contain leachate; and 2) the base material to demonstrate that the mixing pad, compost pad, and curing pad will not rut or settle under the loading of the front-end loader or other heavy equipment.
4. 62-709.500(2)(b) and (c). Site plans (for construction, not "conceptual") signed and sealed by a professional engineer, including: 1) construction details for berms, walls and floors (for the mixing pit and curing pad) with elevations to show that all leachate will be contained; 2) original elevations and

"More Protection, Less Process"

Printed on recycled paper.

proposed final contours for the entire facility; 3) plan and cross-sections details for each pump station/holding tank with elevations; 4) details for all drains, valves, piping, and connections from each pump station/holding tank to the existing leachate forcemain; and 5) seasonal high water table elevation.

5. 62-709.500(3). Design details with elevations and supporting calculations for the stormwater management system.
6. 62-709.500(4)(f). A description of on-site fire protection and control provisions is requested.
7. 62-709.500(5)(c). A description of types of "prohibited materials" and recyclable debris from the curing pad is requested.  
*See ops plan*
8. 62-709.500(5)(g). A description of operation and maintenance for manual and automatic leachate pumping and removal including: 1) operation of all related valves and hoses, 2) method and frequency of cleaning containers and pads, 3) conditions for opening and closing "slide gates", 4) elevations of float switches in pump stations, and 5) use of a pump truck as a contingency only. Calculations for containment are requested for the mixing pad and curing pad to demonstrate all stormwater/leachate will be contained for a 100 year storm.
9. 62-709.500(7)(a). Clarification is requested regarding the composting facility surfaces to meet the requirements of this rule. "Crushed concrete" does not appear to meet these requirements.
10. 62-709.500(7)(b). Clarification is requested regarding the composting facility containment and removal of leachate. 1) How will stormwater coming in contact with the waste be removed when each "tank" is full for the mixing pad and curing pad? 2) How will stormwater and washdown water be contained for the compost pad from spillage while loading the bags, cutting the bags, and relocating the compost from the compost pad to the curing pad? 3) What is the source of washdown water and where will related piping, hoses, and connections be located? 4) Where will leachate piping, hoses, valves and connections be located for leachate reuse for wetting the mixture, and for automatic pumping to the existing leachate forcemain and storage tank? 5) Is each "tank" intended to meet the leachate storage tank requirements of Rule 62-701.400(6)? (Leachate storage tanks must be designed to meet the requirements of 62-701.400(6), however, pump stations with automatic controls for removal of leachate are not subject to these same requirements.)  
*Will not wash down*  
*See ops plan*
11. 62-709.510. The facility shall be operated in a manner, with any needed measures taken, to control vectors and odors. The list of persons (by name and with phone number) to be contacted in the event of an emergency or to implement contingency plans are requested.  
*See ops plan*

Mr. Gary Bennett  
Sarasota County

July 16, 2002  
Page Three

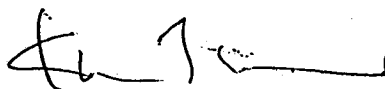
12. 62-709.530. Recordkeeping. a) Forms for all recordkeeping are requested. b) Documentation to demonstrate sampling and testing in accordance with an approved quality assurance plan is requested. c) Frequency of all testing, and of providing records and test results to the Department, is requested. d) List of sampling parameters for the leachate and the compost is requested.
- see ops plan

Please provide all responses that relate to engineering required for design and operation, signed and sealed by a professional engineer. Responses that relate to the facility design and operation should be included as part of the Construction/Operation Plan. All replacement pages should be numbered, and with revision date. To expedite the review process, on one set of the revisions to the narrative reports, deletions may be struckthrough (~~struckthrough~~) and additions may be shaded (shaded) or similar notation method.

"NOTICE! Pursuant to the provisions of Section 120.600, 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 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 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 arrange a meeting with FDEP staff to discuss the items in this letter prior to responding. Please submit your response to this letter as one complete package with an original and two copies of all correspondence. If there are points which must be discussed and resolved, please contact me at (813) 744-6100, extension 382.

Sincerely,



Kim B. Ford, P.E.  
Solid Waste Section  
Division of Waste Management

KBF/ab

Attachment

cc: Mike Sosadeeter, Resource Management Group, Inc.

Paul Wingler, P.E., Sarasota County

Susan Pelz, P.E., FDEP Tampa

Francine Joyal, FDEP Tallahassee

KF       
the file

**Pelz, Susan**

---

**From:** Boroff, Suzanne  
**Sent:** Wednesday, October 23, 2002 8:43 AM  
**To:** Pelz, Susan  
**Subject:** FW: UPDATE Sarasota Food Recovery Project

Thought you might like to look at this before the call this afternoon.  
Suzanne

-----Original Message-----

From: jesse white [mailto:jwhite@recyclesmart.com]  
Sent: Tuesday, October 22, 2002 9:30 AM  
To: Solid Waste Manager Bernadette Thavaiah; ESBC Solid Waste Jean Nutter; Mike Sosadeeter; Project Manager Paul A. Wingler; Solid Waste Operations Manager Gary Bennett; General Manager Thomas Keith; Sandra Washington; ESBC Solid Waste Jodi John  
Cc: Henricks, Ron; Goren, Peter; Boroff, Suzanne; Joyal, Francine  
Subject: UPDATE Sarasota Food Recovery Project

Following is a summary of meetings and directions for the Food Recovery Project.

10/8/02 Meeting in Tallahassee. Tom Keith and I met with Ron Henricks, Peter Goren, and Suzanne Boroff (Solid Waste Section, Tallahassee) to discuss the project status. Tom and I explained the effort to date in seeking a permit for the composting facility, and the concerns Sarasota County has that while we can build the facility, the costs are so high that the project would not be replicable by private enterprises, and therefore the project lacks "sustainability." DEP staff encouraged us to continue with the project because it could result in valuable data gathering. Staff also agreed to re-evaluate the vermi-composting portion of the project. Instead of a centralized facility, decentralized facilities are acceptable. Also, DEP will allow re-allocation of funding from line items where less effort will occur to line-items where more effort will occur.

Outcome: (1) Tom and I will meet with Francine Joyal, FDEP's organics expert, to discuss project plans and confirm conformance with her understanding of the project intent. (2) Sarasota County will re-submit the permit application to FDEP Tampa District with a proposal to do the composting project on top of a temporarily closed landfill cell. Leachate will be directed into the landfill leachate collection system. The project will collect extensive data to ascertain the environmental impacts of composting food waste. This information will be used by FDEP to evaluate the current permit requirements for food waste composting. (3) If the Tampa District accepts this revised application, the County will submit to FDEP a revised Plan and Budget to complete the project. If the Tampa District does not allow this innovative approach, the County may seek to implement only de-centralized vermicomposting, or discontinue the project.

10/10/02 Meeting in Sarasota. Tom Keith and I met with Francine Joyal to discuss the project status. Francine noted that the project intent was to create a Food Recovery Hierarchy, and that establishing a food composting/vermicomposting element is important to that goal. It was agreed that the innovative use of the intermediately closed landfill seemed to address the regulatory issues holding up our permit, but that ultimate authority remains with the Tampa District Office. Francine agreed to assist Sarasota County with developing sampling/analysis parameters that would help DEP evaluate stormwater quality, leachate, and other impacts of composting.

10/21/02 Meeting in Sarasota, Gary Bennett, Jean Nutter, Paul Wingler and I met to discuss submission of revised permit application. It was agreed that Jean Nutter, Paul Wingler and I will put together a proposal to conduct the project on top of cell 1/2, and that we would make this a final application, resulting in either a "green light" from the Tampa District office, or a withdrawal of the application. It was also decided to propose a six-month Pilot program, beginning in December -

ending in May 2003, which would allow sufficient time to demonstrate the process, collect data, and report on results.

I hope I have characterized our conversations correctly, if not please let me know. Jean Nutter, Paul Wingler and I will Draft a revised permit application by next week, and distribute it for review.

Jesse White  
President  
Resource Management Group, Inc.  
jwhite@recyclesmart.com  
www.recyclesmart.com

-----  
"RMG - Creating sustainable programs for business and government to manage solid waste efficiently through waste reduction, materials reuse, recycling, and compost production."

Resource Management Group, Inc.  
200 S. Washington Blvd. Suite 10  
Sarasota, FL 34236  
941-358-7730  
941-358-7731 FAX  
-----

KF 6

**Pelz, Susan**

---

**From:** Joyal, Francine  
**Sent:** Monday, October 21, 2002 3:12 PM  
**To:** Jesse White  
**Cc:** Pelz, Susan; 'Mike Sosadeeter'; Ford, Kim; Clark, Jan Rae; Tedder, Richard; 'TKeith@co.sarasota.fl.us'  
**Subject:** RE: Food Recovery FDEP Meeting

Jessie,

I was thinking about the Sarasota County innovative grant project and parameters that might be useful to look at. Since the food waste could include vegetative waste from imported crops, it would be a good idea to look for pesticides that have been banned in the US but are still used elsewhere in the world (e.g., DDT). I have emailed a contact in DACS, requesting their suggestions on what US-banned pesticides would be good candidates for analyses. I will email you after I hear from DACS.



KF 4

**Pelz, Susan**

---

**From:** Henricks, Ron  
**Sent:** Wednesday, October 16, 2002 12:30 PM  
**To:** Goren, Peter; Moore, Karen S.; Caldwell-Kurka, Jennifer; Boroff, Suzanne; Bujak, Lisa; Barrett, Shane  
**Cc:** Hinkley, Bill; Joyal, Francine; Clark, Jan Rae; Ford, Kim; Pelz, Susan; Tedder, Richard  
**Subject:** FW: Composting Project

FYI. I just received this today.

Ron

-----Original Message-----

From: jesse white [mailto:jwhite@recyclesmart.com]  
Sent: Wednesday, October 16, 2002 11:46 am  
To: Palmer, Mollie  
Cc: General Manager Thomas Keith; Henricks, Ron  
Subject: Composting Project

Dear Ms. Palmer,

Thank you for following up with me after the Council for Sustainable Florida workshop last week. It was a pleasure speaking with you about Sarasota County Government's Food Discards Hierarchy management system, and the regulatory barriers to siting a composting facility. I look forward to working with you and Secretary Struhs to increase diversion and beneficial reuse of this resource.

As we discussed, Sarasota County will be revising its permit request to the FDEP Tampa District Office, and proposing to collect data on the impacts of composting of source separated food waste in the County's innovative demonstration project. The current Rule under which this activity falls, places some stringent barriers to project development, which we believe is why there are currently no Food-Waste composting facilities operating in the State. The County would like to work with FDEP's District Office and its Tallahassee offices in a team approach to find permitting solutions that are both economically viable for the private sector, and protective of human health and the environment.

Below is my contact information as you requested.

Best regards,

Jesse

Jesse White  
President  
Resource Management Group, Inc.  
jwhite@recyclesmart.com  
www.recyclesmart.com

-----  
"RMG - Creating sustainable programs for business and government to manage solid waste efficiently through waste reduction, materials reuse, recycling, and compost production."

Resource Management Group, Inc.  
200 S. Washington Blvd. Suite 10  
Sarasota, FL 34236  
941-358-7730  
941-358-7731 FAX

**Ford, Kim**

---

**From:** Henricks, Ron  
**Sent:** Thursday, October 10, 2002 12:45 PM  
**To:** Pelz, Susan; Ford, Kim  
**Cc:** Boroff, Suzanne  
**Subject:** FW: Composting / permitting

Susan/Kim: FYI.

Ron

-----Original Message-----

**From:** Henricks, Ron  
**Sent:** Thursday, October 10, 2002 10:04 am  
**To:** Palmer, Mollie  
**Cc:** Goren, Peter; Hinkley, Bill; Joyal, Francine; Boroff, Suzanne; Clark, Jan Rae  
**Subject:** Composting / permitting

Mollie:

His name is Jesse White (941-358-7730, 200 S. Washington Blvd. Suite 10 Sarasota, FL 34236, white@recyclesmart.com). He was here Tuesday with one of his clients (Sarasota County) regarding a project we funded (\$500,000+) for Sarasota County from our Innovative Recycling/Waste Reduction Grants. The project focuses on developing an integrated food discard management program, and incorporates composting. The project is described in more detail here:

[http://www.dep.state.fl.us/waste/quick\\_topics/publications/recycling/IGyear4/fullprop/sarasota.pdf](http://www.dep.state.fl.us/waste/quick_topics/publications/recycling/IGyear4/fullprop/sarasota.pdf)

DEP's Tampa District office is raising certain issues regarding permitting the composting facility. Francine Joyal, DEP's Compost Queen in the Solid Waste Section here in Tallahassee, really needs to be involved in any discussion about this. Neither Francine or the District folks will be available until next week (they're all at the same conference this week in Sarasota).

Meanwhile, if you want information before then, feel free to call either me (245-8717) or Peter Goren (245-8714), who manages our Recycling Program.

Ron

***Please note new voice and fax numbers effective September 30, 2002.***

.....  
Ron Henricks, Administrator  
Waste Reduction Section  
Florida Department of Environmental Protection  
Mail Station 4570  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Voice 850-245-8717 (Suncom 205-8717)  
Fax 850-245-8803 (Suncom 205-8803)  
E-mail [ron.henricks@dep.state.fl.us](mailto:ron.henricks@dep.state.fl.us)  
Web <http://www.dep.state.fl.us>  
.....

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

-----Original Message-----

**From:** Palmer, Mollie  
**Sent:** Thursday, October 10, 2002 08:21 am  
**To:** Henricks, Ron  
**Subject:**

ron, on tuesday you met with a consultant who is interestred in composting. the secretary and i met him monday evening at the sustainable council reception and the secretary chatted with him a while and was real interested in his assertion the fla. makes it really hard to get a permit to compost. (i think that was it -- i came in on end of conversation.) the secretary got his card and wrote a note to follow up and discuss with allan and the program. i also got his card but can't find it. what is his name and #? when i get a chance i'll try to call you and follow up on some background on what he was talking about.

thanks mollie

\*\*\*\*\*

Mollie Glover Palmer  
Deputy Chief of Staff  
Department of Environmental Protection  
3900 Commonwealth Boulevard  
Mail Station 50  
Tallahassee, Florida 32399

Phone: 850-245-2011 Suncom 205-2011  
Fax: 850-245-2021 Suncom 205-2021

Please note: Florida has a very broad public records law. Most written communications to or from a state public official regarding state business are public records available to the public and media upon request. Your e-mail communication may be subject to public disclosure.

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

P.1

Oct 7 2002 10:46

Telephone Number	Mode	Start	Time	Pages	Result	Note
818502458803	NORMAL	7,10:44	2'08"	6	* O K	

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION3804 Coconut Palm Drive  
Tampa, FL 33619-8318**FAX**

Date:

10/7/02

Number of pages including cover sheet:

6

To:

SUZANNE BOROFF

SOLID WASTE GRANTS

Phone:

850 245 8718

Fax phone:

850 245 8803

CC:

From:

fu fons

Phone:

(813) 744-6100

Fax phone:

(813) 744-6125

REMARKS:

☐

Urgent

☒

For your review

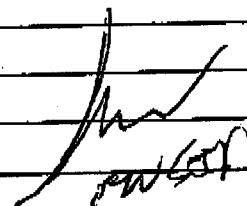
☐

Reply ASAP

☐

Please comment

LETTER AS YOU REQUESTED



FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

3804 Coconut Palm Drive  
Tampa, FL 33619-8318

**FAX**

Date:

10/7/02

Number of pages including cover sheet:

6

To:

SUZANNE BOROFF

SOLID WASTE GRANTS

Phone:

850 245 8718

Fax phone:

850 245 8803

CC:

From:

fm Ford

Phone:

(813) 744-6100

X 382

Fax phone:

(813) 744-6125

REMARKS:

☐

Urgent

☒

For your review

☐

Reply ASAP

☐

Please comment

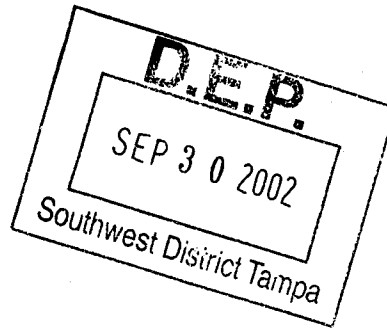
LETTERS AS YOU REQUESTED

*[Signature]*  
PW/GST



## SARASOTA COUNTY

"Dedicated to Quality Service"



September 25, 2002

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Re: Food Waste Composting Facility  
Pending Permit No. 200819-001-SO, Sarasota County

Dear Mr. Ford:

In follow up of our meeting with you on August 15, 2002 regarding our food composting facility permit, the County would like to request that the permit application be kept active while we pursue permit relief.

I discussed the County's position with Ms. Susan Pelz recently on the telephone. Any correspondence regarding relief will be copied to both you and Ms. Pelz. We appreciate your help through the permit process and know that you are bound by the permit rules.

A letter requesting permit relief will be issued soon. Should you have questions, please contact me at (941) 861-1571.

Sincerely,

Gerald L. Bennett  
Manager, Solid Waste Operations

cc: Jodi John, Manager, Office of Sustainability  
Thomas R. Keith, General Manager, Solid Waste/Business Center Operations  
Jean Nutter, Program Specialist  
Jesse White, Resource Management Group, Inc.  
Paul Wingler, P.E., Project Manager



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

July 16, 2002

Mr. Gary Bennett  
Sarasota County  
4000 Knights Trail Road  
Nokomis, FL 34275

**Re: Food Composting Facility  
Pending Permit #200819-001-SO, Sarasota County**

Dear Mr. Bennett:

This is to acknowledge receipt of your permit application for the food composting research/demonstration/development project to be located at the existing CCSWDC.

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 [Chapters 62-701 and 62-709, Florida Administrative Code (F.A.C.)]. Please provide:

1. **62-701.300.** Please provide information which indicates that each of the prohibitions will not be violated during operation of the facility.
2. **62-701.320(8).** Please publish the attached Notice of Application and provide proof of publication to the Department.
3. **62-709.500(1).** Specifications for all construction materials are requested, including but not limited to: 1) the "crushed concrete" to demonstrate that it will be impervious and contain leachate; and 2) the base material to demonstrate that the mixing pad, compost pad, and curing pad will not rut or settle under the loading of the front-end loader or other heavy equipment.
4. **62-709.500(2)(b) and (c).** Site plans (for construction, not "conceptual") signed and sealed by a professional engineer, including: 1) construction details for berms, walls and floors (for the mixing pit and curing pad) with elevations to show that all leachate will be contained; 2) original elevations and

"More Protection, Less Process"

Printed on recycled paper.

- proposed final contours for the entire facility; 3) plan and cross-sections details for each pump station/holding tank with elevations; 4) details for all drains, valves, piping, and connections from each pump station/holding tank to the existing leachate forcemain; and 5) seasonal high water table elevation.
5. 62-709.500(3). Design details with elevations and supporting calculations for the stormwater management system.
  6. 62-709.500(4)(f). A description of on-site fire protection and control provisions is requested.
  7. 62-709.500(5)(c). A description of types of "prohibited materials" and recyclable debris from the curing pad is requested.
  8. 62-709.500(5)(g). A description of operation and maintenance for manual and automatic leachate pumping and removal including: 1) operation of all related valves and hoses, 2) method and frequency of cleaning containers and pads, 3) conditions for opening and closing "slide gates", 4) elevations of float switches in pump stations, and 5) use of a pump truck as a contingency only. Calculations for containment are requested for the mixing pad and curing pad to demonstrate all stormwater/leachate will be contained for a 100 year storm.
  9. 62-709.500(7)(a). Clarification is requested regarding the composting facility surfaces to meet the requirements of this rule. "Crushed concrete" does not appear to meet these requirements.
  10. 62-709.500(7)(b). Clarification is requested regarding the composting facility containment and removal of leachate. 1) How will stormwater coming in contact with the waste be removed when each "tank" is full for the mixing pad and curing pad? 2) How will stormwater and washdown water be contained for the compost pad from spillage while loading the bags, cutting the bags, and relocating the compost from the compost pad to the curing pad? 3) What is the source of washdown water and where will related piping, hoses, and connections be located? 4) Where will leachate piping, hoses, valves and connections be located for leachate reuse for wetting the mixture, and for automatic pumping to the existing leachate forcemain and storage tank? 5) Is each "tank" intended to meet the leachate storage tank requirements of Rule 62-701.400(6)? (Leachate storage tanks must be designed to meet the requirements of 62-701.400(6), however, pump stations with automatic controls for removal of leachate are not subject to these same requirements.)
  11. 62-709.510. The facility shall be operated in a manner, with any needed measures taken, to control vectors and odors. The list of persons (by name and with phone number) to be contacted in the event of an emergency or to implement contingency plans are requested.



Mr. Gary Bennett  
Sarasota County

July 16, 2002  
Page Three

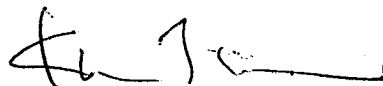
12. 62-709.530. Recordkeeping. a) Forms for all recordkeeping are requested. b) Documentation to demonstrate sampling and testing in accordance with an approved quality assurance plan is requested. c) Frequency of all testing, and of providing records and test results to the Department, is requested. d) List of sampling parameters for the leachate and the compost is requested.

Please provide all responses that relate to engineering required for design and operation, signed and sealed by a professional engineer. Responses that relate to the facility design and operation should be included as part of the Construction/Operation Plan. All replacement pages should be numbered, and with revision date. To expedite the review process, on one set of the revisions to the narrative reports, deletions may be struckthrough (~~struckthrough~~) and additions may be shaded (~~shaded~~) or similar notation method.

"NOTICE! Pursuant to the provisions of Section 120.600, 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 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 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 arrange a meeting with FDEP staff to discuss the items in this letter prior to responding. Please submit your response to this letter as one complete package with an original and two copies of all correspondence. If there are points which must be discussed and resolved, please contact me at (813) 744-6100, extension 382.

Sincerely,



Kim B. Ford, P.E.  
Solid Waste Section  
Division of Waste Management

KBF/ab  
Attachment

cc: Mike Sosadeeter, Resource Management Group, Inc.  
Paul Wingler, P.E., Sarasota County  
Susan Pelz, P.E., FDEP Tampa  
Francine Joyal, FDEP Tallahassee

62-110.106(5). Notices: General Requirements.

Each person who files an application for a Department permit or other approval 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). Notice of Application. Publication of a notice of application shall be required for those projects that, because of their size, potential effect on the environment or natural resources, controversial nature, or location, or reasonably expected by the Department to result in a heightened public concern or likelihood of request for administrative proceedings. 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 an application for permit from Mr. Gary Bennett of Sarasota County for construction and operation of a food composting facility, located at the existing Central County Solid Waste Disposal Complex, 4000 Knights Trail Road, Nokomis, Sarasota 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.



**SARASOTA COUNTY**  
"Dedicated to Quality Service"

**FAXED**  
9/30/02

*AK*

## **FACSIMILE**

To:

*9/10/1*  
*Susan Pelz, P.E.*  
Affiliation: *FDEP - Solid Waste*  
Facsimile number: *813. 744-6125*

From:

*Gary Bennett 2*  
Number of pages including this cover page: *2*

If all pages are not received, call the phone number at the bottom of this page.

Subject:

*Letter dated 9/25/02 - Kim B. Ford, P.E.*

Date:

*9/30/02*

Comments:

*Please accept my apology for  
not copying you on the attached  
letter.*

*Thank you,*

**SARASOTA COUNTY***"Dedicated to Quality Service"*

J 10/1/02

September 25, 2002

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Re: Food Waste Composting Facility  
Pending Permit No. 200819-001-SO, Sarasota County

Dear Mr. Ford:

In follow up of our meeting with you on August 15, 2002 regarding our food composting facility permit, the County would like to request that the permit application be kept active while we pursue permit relief.

I discussed the County's position with Ms. Susan Pelz recently on the telephone. Any correspondence regarding relief will be copied to both you and Ms. Pelz. We appreciate your help through the permit process and know that you are bound by the permit rules.

A letter requesting permit relief will be issued soon. Should you have questions, please contact me at (941) 861-1571.

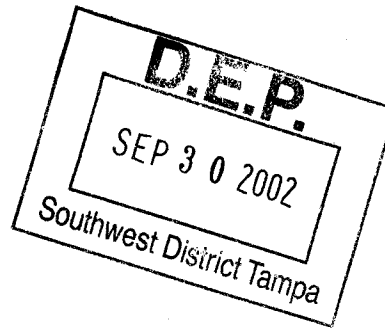
Sincerely,

Gerald L. Bennett  
Manager, Solid Waste Operations

cc: Jodi John, Manager, Office of Sustainability  
Thomas R. Keith, General Manager, Solid Waste/Business Center Operations  
Jean Nutter, Program Specialist  
Jesse White, Resource Management Group, Inc.  
Paul Wingler, P.E., Project Manager



**SARASOTA COUNTY**  
"Dedicated to Quality Service"



September 25, 2002

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Re: Food Waste Composting Facility  
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Gerald L. Bennett  
*Manager, Solid Waste Operations*

cc: Jodi John, Manager, Office of Sustainability  
Thomas R. Keith, General Manager, Solid Waste/Business Center Operations  
Jean Nutter, Program Specialist  
Jesse White, Resource Management Group, Inc.  
Paul Wingler, P.E., Project Manager

**Ford, Kim**

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**From:** Hinton, Jemy  
**Sent:** Friday, September 20, 2002 1:25 PM  
**To:** Ford, Kim  
**Subject:** RE: cattle feed

Thank you Kim.....I would love to see the plan. I had sat in on that original meeting when they discussed it but I didn't know where they were in the process. I thought of them too. Thanks again. -J

-----Original Message-----

**From:** Ford, Kim  
**Sent:** Friday, September 20, 2002 10:07 AM  
**To:** Hinton, Jemy  
**Cc:** Pelz, Susan  
**Subject:** RE: cattle feed

Sarasota County is considering being part of a food waste collection (from Publix produce) and composting program. Part of the food waste collectors job will be to decide what can be fed to cows. I have their plan if you want to see it.

-----Original Message-----

**From:** Hinton, Jemy  
**Sent:** Thursday, September 19, 2002 10:52 AM  
**To:** Southwest District Employees  
**Subject:** cattle feed

Greetings everyone. Does anyone know of products currently going into landfills that could possibly be fed to cows? As you probably know, cows will eat almost anything ....cardboard, citrus pulp, food by-products, etc. If it is sprayed with pesticides, or may contain poisonous plants, such as yard waste, it would not be considered. If you can think of anything, please reply. Thanks. -Jemy

**Ford, Kim**

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**From:** Pelz, Susan  
**Sent:** Thursday, August 22, 2002 8:23 AM  
**To:** Joyal, Francine; Ford, Kim  
**Cc:** McGuire, Chris; Tedder, Richard; Clark, Jan Rae  
**Subject:** RE: Compost/Leachate Testing

Looks o.k. to me, but I think his question really stems from whether or not runoff from the curing area should be considered to be leachate. I think it is. He may be able to collect the runoff & test it to show that it meets water quality stds, but it's still leachate & he shouldn't discharge it until he knows it meets stds. If he wants to discharge into a surface water body he may need to be thinking NPDES.

Clearly the mixing area has leachate which needs to be collected and disposed of appropriately.

-----Original Message-----

**From:** Joyal, Francine  
**Sent:** Wednesday, August 21, 2002 10:55 AM  
**To:** Pelz, Susan; Ford, Kim  
**Cc:** McGuire, Chris; Tedder, Richard; Clark, Jan Rae  
**Subject:** FW: Compost/Leachate Testing

As you can see, I've heard from Chris. Since Mike Sosadeeter emailed you with the questions, I'll leave it to you to reply.

To summarize my comments:

1. Parameters for compost testing are found in 62-709.530, F.A.C. There are no other compost parameters that would apply to permit processing. But, since this is a new permit or modification of the existing landfill permit, they need to follow the requirements in Chapter 62-160, F.A.C.
2. The parameters applicable (permit-wise) to the stormwater/leachate issue are what ever class surface water applies to the site in Chapter 62-302, F.A.C.

I intend to return Mike's call and add that for data collection to see if requirements can be relaxed for food waste compost (i.e., future rule making), I would look at the Class I surface water requirements.

Francine

-----Original Message-----

**From:** McGuire, Chris  
**Sent:** Tuesday, August 20, 2002 10:39 PM  
**To:** Joyal, Francine  
**Cc:** Tedder, Richard  
**Subject:** RE: Compost/Leachate Testing

Francine, 62-160 contains a provision that existing permits continue to comply with the old QA requirements until the time for permit renewal, so I would say that unless the applicant wants to apply for a modification now, they can continue to rely on their previously-approved QA plan. But we might need to do a little interpretive memo saying that the specific provision in 62-709 should be read in conjunction with the new 62-160 for new facilities, modifications, or renewals.

Also, you are correct that we cannot use 62-777 for compost facilities.

-----Original Message-----

**From:** Joyal, Francine  
**Sent:** Tuesday, August 20, 2002 2:15 PM  
**To:** Pelz, Susan; Ford, Kim

Cc: McGuire, Chris; Clark, [REDACTED] n Rae  
Subject: RE: Compost/Leachate Testing

I have a call from Mike that I have not responded to yet myself about clarification of what they need to test for. He is right that testing the compost itself is covered in Rule 62-709.530, F.A.C., with classification found in Rule 62-709.550, F.A.C. But, I would also mention Chapter 62-160, F.A.C., which applies to quality assurance.

[CHRIS - Rule 62-709.530(1)(e), F.A.C., specifies "Sample collection, preservation, and analysis shall assure valid and representative results pursuant to a Department-approved quality assurance plan", but QA plans no longer exist in the current Chapter 62-160, F.A.C. How do we handle this now? Can we do an interim policy memo without getting into trouble for incipient rulemaking?]

Regarding leachate, Rule 62-709.500(7)(a), F.A.C., does specify leachate reuse or treating it to meet applicable standards of Chapters 62-25 (Stormwater Discharge), 62-302 (Surface Water Quality) and 62-330 (Environmental Resource Permitting), F.A.C. These referenced regulations, especially Chapter 62-302, F.A.C., are the ones they need to look at for testing parameters. But, I believe there are two desired outcomes. One would be for the specific site situation and the ability to direct stormwater from the curing area into the existing stormwater system. The other desired outcome is more long range -- data to help assure DEP that relaxed requirements for food waste composting operations would still be protective of the environment.

As far as what results need to be achieved so that we can be comfortable with release into stormwater, then I believe the analytical results should comply with the category the current system is subject to in Chapter 62-302, F.A.C. But for a blanket relief for future systems, we should consider the standards for Class I surface waters (potable water sources), and perhaps the surface water cleanup target levels in 62-777, F.A.C.

I did a quick comparison between the tables in Chapters 62-302 and 62-777, F.A.C., and it appears that most values in 62-777 are the same as for Class I surface waters. But, in some cases Chapter 62-777, F.A.C., is more stringent. However, it is questionable whether we can apply the Chapter 62-777, F.A.C., requirements to a composting facility permit or any other situation not specifically authorized by the statutes. Until such time as our ability to use Chapter 62-777, F.A.C., is cleared up, I recommend using Chapter 62-302, F.A.C., Class I surface waters for consideration in relieving requirements of food waste composting facilities (as stated above). Also, note that Chapter 62-302, F.A.C., addresses additional parameters such as bacteriological, biological integrity, BOD, specific conductance, dissolved oxygen, dissolved solids, nutrients, oils and greases, pH, and turbidity. Some parameters in Chapter 62-302, F.A.C., are based on background, such as the turbidity criteria being less than or equal to 29 NTU about natural background.

-----Original Message-----

From: Pelz, Susan  
Sent: Monday, August 19, 2002 4:02 PM  
To: Ford, Kim; Joyal, Francine  
Subject: RE: Compost/Leachate Testing

I think I told him in the pre-application meeting that runoff from material which is in the curing area is considered to be leachate. Until the "cured" material meets the definition of "finished compost" I don't think we can let him just run it off to stormwater. If he wants to capture the runoff & test it to see if it meets surface and/or groundwater standards, he can try to do that, but he needs to collect it & sample before discharge.

Francine, what do you think?

-----Original Message-----

From: Ford, Kim  
Sent: Monday, August 19, 2002 2:02 PM  
To: Pelz, Susan  
Cc: Joyal, Francine



Subject: FW: Compost/Leachate Testing

I am sure he wants to know how clean is clean for leachate so that it doesn't not need to be collected from some composting or curing area. Someone at our meeting on Thursday the 15th suggested our stormwater rule requirement since they want it to run off to a stormwater ditch.

Kim

-----Original Message-----

From: Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]

Sent: Friday, August 16, 2002 4:17 PM

To: Ford, Kim

Subject: Compost/Leachate Testing

Kim,

Thanks for the energetic meeting yesterday.

I have a question about testing procedures for compost and leachate.

I have read rules 62-709.530 and 62-709.550 about compost testing and classification. Are these the only rules I need to follow regarding the testing of compost? Are there any other rules I need to be aware of?

Are there any rules regarding the testing of leachate?

Thanks,

Mike

Mike Sosadeeter, Project Manager  
Resource Management Group, Inc.  
200 S. Washington Blvd., Suite 10  
Sarasota, Florida 34236  
941-358-7730  
941-358-7731 FAX



8/15/02

MEETING

SARASOTA FOOD COMPOSTING

1:30 —

MS. NOW \$170,000 COST EST  
WAS ORIGINALLY \$34,000 COST (W/ NATIVE SOIL)  
JESSE DISCUSSED INTENTION WITH FRANCINE

PAUL SAYS COST DOES NOT MAKE SENSE  
IF QUALITY IS NOT A PROBLEM

KE ASKED WHY COST HIGHER THAN  
ORIGINAL APPR

- JESSE
- 1) LEACHATE COLLECTION UNDER .POD AREA
  - 2) TANK DESIGN
  - 3) CONTAINMENT OF ALL WATER FROM  
MIXING PADS.

KE ASKED WHY COST IS HIGHER

SO IF NOT WE CAN AGREE ON HOW TO RESOLVE

1) POD AREA

KE SAID LEACHATE COLLECTION NO EXPECTING FOR  
POD AREA SO ENVISION A ROOF

NO CONTACT FROM RAINFALL, USING TARP,  
CLEAN UP W/ SHOVEL, TARP AS REMAINING W/ LOADER

GRASS SURFACE TO BE IMPERVIOUS AND HOLD UP

KE WILL DO A HOSE-TEST

TO CONFIRM FLOW ACROSS NOT DOWN THRU

pg 2

2) MIXING PAD. - IS TO BE CONCRETE  
KE How clean is clean BEFORE DISCHARGE  
TO STORMWATER DITCH

Jesse How clean is clean

FRANCINE IF NOT IN CONTACT WITH WASTE  
THEN IS NOT LEACHATE

KE slope trench to tank AND  
REQUIRE BACKUP TO OVERFLOW TO A BOX  
FOR SAMPLING

Jesse pressure washer so  
NO VISIBLE DEBRIS

KE slope TRENCH TO TANK / SEPARATE

3) TANK

PP only 1 pump station  
NEEDS AND GRAVITY FLOW  
FROM OTHER AREA

~~KE~~ SUGGEST pump station  
NOT TANK with pump (WOL  
AND BOX TO CONTROL, CONTAIN, OR  
ROUTE OR DISCHARGE TO EXISTING

LEACHATE FOREMAN

4) CURING AREA how to minimize leachate

TARP

Jesse say is soil cement curing pads

**MEET-ME  
CONFERENCE  
CONFIRMATION AND REQUEST FORM  
STATE TECHNOLOGY OFFICE-RESOURCE ACCOUNTABILITY**

**TO: ANNA BLACK**

MyFlorida.com

*my*

**FAX: 61813 744 6125**

**FROM: HILDA GAINES:**

**"UNITED WE STAND "**



**VCONF@MyFlorida.com**



**THIS IS YOUR MEET-ME CONFERENCE NUMBER(S) FOR THE DATE(S)  
REQUESTED.**

<b>"MEET-ME" CONFERENCE</b>					
<b>DATE</b>	<b>WHAT TIME TO WHAT TIME</b>	<b>LINES AVAILABLE</b>	<b>SUNCOM #</b>	<b>NON-SUNCOM #</b>	<b>CONFIRMATION #</b>
<b>8/15/02</b>	<b>1-3P</b>	<b>10</b>	<b>292 2903</b>	<b>850 922 2903</b>	<b>108 0815</b>

*Distribute the Meet-Me number to all participants/callers. You must call the given number approximately one (1) minute prior to the actual scheduled time. It takes two callers to dial into the number to stop the ringing. As the other participants call the Meet-Me number, you will hear a short busy signal and the person will then be connected.*

**Conference Operator**

**TELE: 922 9912\*\*\*\*SC 292 9912**



**FAX: 413 0994\*\*\*\*SC 293 0994**

**Ford, Kim**

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**From:** Mike Sosadeeter [msosadeeter@recyclesmart.com]  
**Sent:** Monday, August 12, 2002 3:35 PM  
**To:** Ford, Kim  
**Cc:** Pete Putman; Jean Nutter; Pelz, Susan; Gary Bennett; Paul Wingler; Jesse White; Ellie Gibeau; Joyal, Francine; Jodi John; Peggy Connell  
**Subject:** Food Recovery FDEP Meeting

**Importance:** High

   
555DEPResponseSect CountyMeeting.7.25.02  
ions.doc \_min.doc Kim,

Attached is a brief first draft of the responses to your request for more information for Pending Permit #200819-001-SO. Sarasota County and Resource Management Group compiled these responses and questions in a meeting on July 25, 2002. As you can see, we have several questions for you before we develop complete answers to your questions.

I would like to use this document as the basis for our meeting scheduled for Thursday, August 15 at 1:30PM.

I have attached a second document that outlines each of the sections of chapter 62-701/709 as they relate to your request for additional information. We can use this document for reference during our meeting.

Thanks,

Mike Sosadeeter

Mike Sosadeeter, Project Manager  
Resource Management Group, Inc.  
200 S. Washington Blvd., Suite 10  
Sarasota, Florida 34236  
941-358-7730  
941-358-7731 FAX

The following sections of chapter 62-701: **SOLID WASTE MANAGEMENT FACILITIES** and chapter 62-709: **CRITERIA FOR THE PRODUCTION AND USE OF COMPOST MADE FROM SOLID WASTE**, are located next to the numbered requests for additional information per the July 16, 2002 letter received from Kim B. Ford, P.E., Solid Waste Section, Division of Waste Management, Department of Environmental Protection, for the Food Recovery Project.

**1. 62-701.300 Prohibitions.**

(1) General prohibition.

(a) No person shall store, process, or dispose of solid waste except at a permitted solid waste management facility or a facility exempt from permitting under this chapter.

(b) No person shall store or dispose of solid waste in a manner or location that causes air quality standards to be violated or water quality standards or criteria of receiving waters to be violated.

(2) Disposal. Unless authorized by a Department permit or site certification in effect on January 6, 1993, no solid waste shall be stored or disposed of by being placed:

(a) In an area where geological formations or other subsurface features will not provide support for the solid waste;

(b) In any area where the absence of geological formations or subsurface features would allow for the unimpeded discharge of waste or leachate to ground or surface water. A person may dispose of solid waste in such an area upon demonstration to the Department that permanent leachate control methods will result in compliance with water quality standards under Chapters 62-302 and 62-520, F.A.C.;

(c) Within 500 feet of an existing or approved potable water well unless disposal takes place at a facility for which a complete permit application was filed or which was originally permitted before the potable water well was in existence. This prohibition shall not apply to any renewal of an existing permit that does not involve lateral expansion, nor to any vertical expansion at a permitted facility;

(d) In a dewatered pit unless the pit is lined and permanent leachate containment and special design techniques are used to ensure the integrity of the liner;

(e) In an area subject to frequent and periodic flooding unless flood protection measures are in place;

(f) In any natural or artificial body of water including ground water;

(g) Within 200 feet of any natural or artificial body of water, including wetlands within the jurisdiction of the Department, except bodies of water contained completely within the property boundaries of the disposal site, which do not discharge from the site to surface waters. A person may dispose of solid waste within the 200 foot setback area upon demonstration to the Department that permanent leachate control methods will result in compliance with water quality standards under Chapters 62-302 and 62-520, F.A.C. Stormwater control

**Food Recovery Project**  
**Compost Facility – County Landfill**  
**FDEP Permit – Request for More Information**

IG1-14

methods shall meet stormwater requirements of Chapter 62-25, F.A.C. However, nothing contained herein shall prohibit the Department from imposing conditions necessary to assure that solid waste disposed of within the 200 foot setback area will not cause pollution from the site in contravention of Department rules.

(h) On the right of way of any public highway, road, or alley; and  
(i) Within 1000 feet of an existing or approved potable water well serving a community water system as defined in Rule 62-550.200(9), F.A.C., unless disposal takes place at a facility for which a complete permit application was filed or which was originally permitted before the water well was in existence. It is the intent of the Department that this provision shall be repealed on the effective date of any rule promulgated by the Department which regulates wellhead protection areas generally. This prohibition shall not apply to any renewal of an existing permit that does not involve lateral expansion, nor to any vertical expansion at a permitted facility.

(3) Burning. Open burning of solid waste is prohibited except in accordance with Rule 62-701.520(2), F.A.C. Controlled burning of solid waste is prohibited except in a permitted incinerator, or in a facility in which the burning of solid waste is authorized by a site certification order issued under Chapter 403, Part II, F.S.; clean vegetative and wood wastes may be burned in an air curtain incinerator in accordance with Rule 62-2.500(1)(e), F.A.C.

(4) Hazardous waste. No hazardous waste shall be disposed of in a solid waste management facility unless such facility is permitted pursuant to Chapter 62-730, F.A.C.

(5) PCBs. No person may dispose of liquids containing a polychlorinated biphenyl (PCB) concentration of 50 parts per million or greater, or non-liquid PCBs at concentrations of 50 parts per million or greater in the form of contaminated soil, rags, or other debris, in any solid waste disposal unit in this state.

(6) Biohazardous waste. Biohazardous waste shall be properly incinerated so that little or no organic material remains in the ash residue, or shall be processed by a method approved by the Department pursuant to Chapter 62-712, F.A.C. No untreated biohazardous waste shall be knowingly deposited in any landfill.

(7) Class I surface waters. The Department shall not issue a construction permit for a landfill within 3,000 feet of Class I surface waters.

(8) Special wastes for landfills. No person who knows or who should know of the nature of such solid waste shall dispose of the following wastes in any landfill:

- (a) Lead-acid batteries;
- (b) Used oil, except as provided in Chapter 62-710, F.A.C.;
- (c) Yard trash, except in unlined landfills classified by Department rule;
- (d) White goods; and
- (e) Whole waste tires, except as provided in Chapter 62-711, F.A.C.



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(9) Special wastes for waste-to-energy facilities. No person who knows or who should know of the nature of such solid waste shall dispose of lead-acid batteries in any waste-to-energy facility.

(10) Liquids restrictions.

(a) Noncontainerized liquid waste shall not be placed in solid waste disposal units unless:

1. The waste is household waste other than septic waste; or
2. The waste is leachate or gas condensate derived from the solid waste disposal unit, or byproducts of the treatment of such leachate or gas condensate, and the solid waste disposal unit is lined and has a leachate collection system.

(b) Containers holding liquid waste shall not be placed in a solid waste disposal unit unless:

1. The container is a small container similar in size to that normally found in household waste;
  2. The container is designed to hold liquids for use other than storage;
- or

3. The waste is household waste.

(c) Containers or tanks twenty gallons or larger in capacity shall either have one end removed or cut open, or have a series of punctures around the bottom to ensure the container is empty and free of residue. The empty container or tank shall be compacted to its smallest practical volume for disposal.

(11)(a) Except as provided in paragraph (b) of this subsection, no person may mix or commingle used oil with solid waste that is to be disposed of in landfills or directly dispose of used oil in landfills. Oily wastes may be disposed of in landfills unless prohibited in other department rules.

(b) The Department shall allow disposal of used oil commingled with solid waste if it determines that it is not practicable to separate the used oil from the solid waste, and if such disposal will pose no significant threat to public health or the environment.

Specific Authority 403.704, FS.

Law Implemented 403.704, 403.707, 403.708, FS.

History -- Transferred from 10D-12.06, 10D-12.07, 10-1-74; Amended 5-24-79, 5-27-82; Previously Numbered as 17-7.04; Amended 12-10-85; Formerly 17-7.040; Amended 6-25-90; Formerly 17-701.040; Amended 1-6-93, 1-2-94, 5-19-94, Formerly 17-701.300, Amended 12-23-96, 4-23-97.

**2. 62-701.320 (8) Solid Waste Management Facility Permit Requirements, General.**

(8) Notice of application.

(a) An applicant for a permit to construct or substantially modify a solid waste management facility shall publish and provide proof of publication to the Department of a Notice of Application in a newspaper of general circulation in the area where the facility will be located, in accordance with Rule 62-103.150, F.A.C.

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(b) For all landfills, the Department shall mail a notice of receipt of permit application to the Chair of the Board of County Commissioners, the highest ranking elected official of the municipality, and each State Senator and Representative serving the jurisdiction in which the project is located. After the Department completes the permit review, a copy of the notice of intent to issue or deny the permit will also be sent to these same officials.

**3. 62-709.500 (1) Design Criteria.**

(1) The facility site shall have sufficient structural support for the operation including total waste received, material processed, compost stored, equipment, and structures to be built on site.

**4. 62-709.500 (2) (b) and (c) Design Criteria.**

(2) Facility design plans shall include:

(b) A site plan at a scale of not over 200 feet to the inch showing dimensions, details of the proposed areas for receiving, processing, production, curing and storage, and fencing;

(c) Topographic maps at the same scale as the site plan with no less than one-foot and no greater than five-foot contour intervals showing contour interval used, original elevations and proposed final contours, general outline of facility area, access roads, grades required for proper drainage, any special drainage devices, and all other pertinent information;

**5. 62-709.500 (3) Design Criteria.**

(3) Stormwater management system design standards.

(a) Stormwater controls shall be designed, constructed, and maintained to meet the requirements of Chapters 62-25 and 62-330, F.A.C., or requirements of the water management district where the Department has delegated stormwater permitting to a water management district.

(b) Stormwater management systems shall be designed to prevent run-off from entering the receiving, processing, curing or storage areas. Stormwater or other water which comes into contact with the solid waste received, being stored, processed or composted, or which mixes with leachate shall be considered leachate and shall be reused in the process or treated to meet applicable standards of Chapters 62-25, 62-302 and 62-330, F.A.C., at the point of discharge.

**6. 62-709.500 (4) (f) Design Criteria.**

(4) The facility site shall be provided with operational features and appurtenances necessary to maintain a clean and orderly operation. These minimum features are:

(f) Fire protection and control provisions to deal with accidental burning of solid waste or compost at the facility;

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**7. 62-709.500 (5) (c) Design Criteria.**

(5) An operation plan shall be submitted with all facility construction permit applications. The operation plan shall provide written instructions for the daily operation and maintenance of the facility. The plan shall be revised when operational procedures change. The plan shall include the following detailed procedures at a minimum:

(c) Controlling the type of waste received at the site. The plan shall specify inspection procedures, number and location of spotters and procedures to be followed if prohibited wastes are discovered;

**8. 62-709.500 (5) (g) Design Criteria.**

(g) Operations of leachate and stormwater controls;

**9. 62-709.500 (7) (a) Design Criteria.**

(7) In addition to the requirements specified in (1) through (6) above, the following requirements apply to composting facilities which process solid waste other than only yard trash or manure.

(a) The waste receiving and storage areas, and the processing and curing areas shall be located on surfaces, such as asphalt or concrete, to minimize release of leachate into groundwater. The surfaces shall be capable of withstanding wear and tear from normal operations.

**10. 62-709.500 (7) (b) Design Criteria.**

(7) In addition to the requirements specified in (1) through (6) above, the following requirements apply to composting facilities which process solid waste other than only yard trash or manure.

(b) The facility shall have a leachate collection and removal system designed, constructed, maintained and operated to collect and remove leachate from the waste receiving and storage areas and the processing and curing areas. Washdown from these areas and equipment, stormwater coming into contact with solid waste or compost in these areas, and condensate will be considered leachate.

**11. 62-709.510 Operation Criteria.**

(1) The following operation requirements apply to all composting facilities.

(a) The design features pursuant to Rule 62-709.500, F.A.C., shall be properly operated and maintained.

(b) The facility shall be operated in a manner, with any needed measures taken, to control vectors and odors.

(c) To insure proper staffing and suitable processing facilities, the following shall be required:

1. During hours when solid waste is received, an attendant at all facility sites; and

2. Communication facilities for use in emergencies at all facilities.

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(d) Measures shall be taken to avoid mixing incoming solid waste with finished compost ready to be used or sold for use to discourage the re-introduction of weed seeds and

(e) More than half of the compost stored at the facility shall be used or sold for use within each year beginning the third year after facility startup. Further, any compost remaining at the facility for three years after it was produced shall be disposed of pursuant to the requirements of Chapter 62-701, F.A.C., or shall be reprocessed so that it can be sold or used.

(f) The amount of compost stored at the facility shall not exceed the designed storage capacity.

(2) In addition to the requirements specified in (1) above, the following requirements apply to composting facilities that process only yard trash or manure.

(a) Yard trash or manure which will not be made into compost or processed into other usable material shall be removed at least monthly.

(b) Solid waste other than yard trash or manure received at the facility shall be separated and stored in a manner that prevents vector problems, and shall be removed within 72 hours. However, recovered material which is stored in a manner that prevents vector problems may remain at the facility for up to one year.

(3) In addition to the requirements specified in subsection (1) above, the following requirements apply to composting facilities that process solid waste, other than only yard trash or manure.

(a) All waste delivered to the facility shall be confined to a designated delivery or storage area until processed. Any material not processed within 72 hours shall be removed and disposed of pursuant to Chapter 62-701, F.A.C. Any recovered materials removed from the solid waste stream shall be stored in a manner that prevents vector problems, and shall be removed from the facility at least annually.

(b) The temperature of the composting solid waste shall be monitored at a depth of two feet into the pile on a daily basis during the initial week of composting and then on a weekly basis until the finished compost is produced. The temperature readings and the length of the composting period shall be recorded. These records shall be kept for at least three years and shall be made available for inspection by Department personnel.

(4) When a solid waste management facility that produces compost ceases operation, all residuals, solid waste, and recyclable materials shall be removed from the site and recycled, or disposed of pursuant to the requirements of Chapter 62-701, F.A.C. Any remaining compost shall be used in accordance with the requirements of this rule or disposed of pursuant to the requirements of Chapter 62-701, F.A.C.

Specific Authority 403.061, 403.704, 403.7043, FS.

Laws Implemented 403.7043, FS.

History -- 11-21-89, Formerly 17-709.510, Amended 10-22-00.

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**12. 62-709.530 Testing, Recording and Reporting Requirements.**

(1) The compost product shall be sampled and analyzed as follows.

(a) A composite sample of the compost produced at each composting facility shall be analyzed at intervals of every 20,000 tons of compost produced or every three months, whichever comes first, for:

Parameter	Unit	Method
Moisture	%	EPA 160.3
Total Nitrogen	% dry weight	EPA 351 and 353
Total Phosphorus	% 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

(b) Compost produced by persons for their own use, where the compost is made from yard trash or manure, is not required to be sampled and analyzed as specified in (a) above.

(c) In addition to (a) above, compost made from solid waste, other than only yard trash or manure shall be analyzed at intervals of every 20,000 tons of compost produced or every three months, whichever comes first, for:

<u>Parameter</u>	<u>Unit</u>	<u>Method</u>
Foreign Matter	%	see (f) below
Cadmium	mg/kg dry weight	EPA 3050/7130
Copper	mg/kg dry weight	EPA 3050/7210
Lead	mg/kg dry weight	EPA 3050/7420
Nickel	mg/kg dry weight	EPA 3050/7520
Zinc	mg/kg dry weight	EPA 3050/7950
Fecal Coliform	most probable number(MPN) per gram of volatile suspended solids(VSS)	SM 908

(d) The Department may decrease or increase the parameters to be analyzed for or the frequency of analysis based on monitoring data, changes in the waste stream or processing, or the potential presence of toxic substances.

e) Sample collection, preservation, and analysis shall assure valid and representative results pursuant to a Department-approved quality assurance plan. Composite samples shall consist of at least three individual samples of equal volume taken from separate areas along the side of the pile of the compost produced. Each sampling point shall be at a depth of two feet into the pile from the outside surface of the pile. U.S. Environmental Protection Agency (EPA) Methods 160.3, 160.4, 351, 353 and 365 are contained in Methods for Chemical

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Analysis of Water and Waste, 1979; EPA Methods 3050, 7130, 7210, 7420, 7520, 7610, 7950 and 9045 are contained in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA SW-846), 3rd Edition, September 1986, updated December 1987; Standard Method (SM) 908 is contained in Standard Methods for the Examination of Water and Wastewater, 16th Edition, 1985. Sampling shall be performed in accordance with guidance contained in Chapter 9 of EPA SW-846 and Section 4.0 of Engineering Support Branch Standard Operating Procedures and Quality Assurance Manual, EPA Region IV, April 1, 1986. Analytical results shall be submitted to the appropriate District office within 30 days of sample collection.

(f) Foreign matter content shall be determined by passing a dried, weighed sample of the compost product through a one-quarter inch or six millimeter screen. EPA Method 160.3 shall be used to dry the sample. The material remaining on the screen shall be visually inspected, and the foreign matter that can be clearly identified shall be separated and weighed. The weight of the separated foreign matter divided by the weight of the total sample multiplied by 100 shall be the % dry weight of the foreign matter content.

(g) The organic matter is determined by measuring the volatile solids content using EPA method 160.4.

(h) The reduction of organic matter is determined by comparing the organic matter content of the feedstock into the composting process and the organic matter content of the compost product. The amount of reduction is determined as a percent of the original amount contained in the feedstock using the following calculation:

$$\% \text{ ROM} = [1 - (\text{OMK}(100 - \text{OM}) / \text{OM}(100 - \text{OMK}))]100$$

where: % ROM = reduction of organic matter, OM = % organic matter content of dry matter before decomposition, and OMK = % organic matter content of dry matter after decomposition.

(2) Facility owners or operators shall record and maintain for three years the following information regarding their activities for each month of operation of the facility. Records shall be available for inspection by Department personnel during normal business hours and shall be sent to the Department upon request:

- (a) Analytical results on compost testing;
- (b) The quantity, type and source of waste received;
- (c) The quantity and type of waste processed into compost;
- (d) The quantity and type of compost produced by product classification; and
- (e) The quantity and type of compost removed for use or disposal, by product classification, and the market or permitted disposal facility.

(3) Owners and operators of facilities producing compost made from solid waste shall submit to the Department an annual report by June 1. The report shall be submitted on Form 62-701.900(11), and shall include:

- (a) The facility name, address and permit number;

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- (b) The year covered;
  - (c) The total quantity in tons, with sludge values expressed in dry weight, and type of waste received at the facility during the year covered by the report;
  - (d) The total quantity in tons, with sludge values expressed in dry weight, and type of waste processed into compost at the facility during the year covered by the report;
  - (e) The total quantity in tons and type of compost produced at the facility, by product classification, during the year covered by the report; and
  - (f) The total quantity in tons and type of compost removed for use or disposal from the facility, by product classification, along with a general description of the market if for use during the year covered by the report.
- Specific Authority 403.061, 403.704, 403.7043, FS.  
Law Implemented 403.7043, FS.  
History -- 11-21-89, Formerly 17-709.530, Amended 10-22-00.

# Food Recovery Project

IG1-14

## County Meeting – FDEP Permit Application Questions Meeting Minutes

Date: Thursday, July 25, 2002  
Time: 1:00 – 3:00PM  
Location: Sarasota County Central County Waste Disposal Complex  
Purpose: Discuss FDEP's request for additional information relating to the food waste compost facility permit application

### Desired Results:

- General answers to FDEP's questions
- Questions to discuss with FDEP in terms of the type and depth of information they are requesting
- Set a meeting with FDEP to discuss the permit application and answers to requested additional information

### Participants:

- Gary Bennett, Sarasota County
- Jean Nutter, Sarasota County
- Paul Wingler, Sarasota County
- Mike Sosadeeter, RMG

### Topics Discussed

#### A. FDEP requests for additional information

1. **62-701.300.** Please provide information which indicates that each of the prohibitions will not be violated during operation of the facility.

#### Response

The proposed food waste composting facility shall be designed, built and operated in a manner that meets all requirements stated in section 62-701.300.

2. **62-701.320 (8).** Please publish the attached Notice of Application and provide proof of publication to the Department.

#### Response

Notice of Application was published by Sarasota County in the Sarasota Herald Tribune on July 24, 2002.

3. **62-709.500(1).** Specifications for all construction materials are requested, including, but not limited to: 1) the "crushed concrete" to demonstrate that it will be impervious and contain leachate; and 2) the base material to demonstrate that the mixing pad, compost pad, and curing pad will not rut or settle under the loading of the front-end-loader or other heavy equipment.

#### Response

- Leachate will be collected from the concrete mixing pad as stated in the permit application.
- Crushed concrete was determined by professional engineers to be a more acceptable material than soil cement, as discussed in the FDEP meeting on April 18, for the Ag-Bag POD and curing pad areas. If compacted correctly, crushed concrete should be impervious to leachate.
- The 'leachate' produced by the curing pile will be tested to determine its true quality, as stated in the permit application. Changes to the curing pad could be implemented based on test results (See the permit application for more details).
- Compacted crushed concrete will withstand the forces of heavy equipment proposed for the operation.

*who?*  
*goes UNDER SURFACES  
as a base NOT THE SURFACE*



# Food Recovery Project

IG1-14

## County Meeting – FDEP Permit Application Questions Meeting Minutes

- The curing pad could be covered to prevent rainwater from infiltrating the pile, as discussed in the permit application, thus minimizing leachate.
- Concrete or other impervious material could be used in the curing pad area if compacted crushed concrete is deemed unacceptable. This will increase the cost of construction.

4. **62-709.500(2)(b) and (c).** Site plans (for construction, not “conceptual”) signed and sealed by a professional engineer, including....

### Response

Engineering drawings can be produced to the level needed by FDEP. Further discussion with FDEP is needed to determine actual needs.

5. **62-709.500(3).** Design details with elevations and supporting calculations for the stormwater management system.

### Response

Engineering drawings can be produced to the level needed by FDEP. Further discussion with FDEP is needed to determine actual needs.

6. **62-709.500(4) (f).** A description of on-site fire protection and control provisions is requested.

### Response

- Dry fire hydrants exist at the landfill connected to ponds #3, #5 and #7.
- The Food Waste Composting Facility manager/operator will have an agreement with Onyx Corporation to utilize their on-site water trucks for use in case of fire. Onyx has two 4,000 gallon Mack chassis water trucks with 200 gpm Honda pumps. Onyx Corporation operates the yard waste composting facility across the road from the proposed food waste composting facility.
- As a last resort, the local Nokomis fire department could be called to contain a fire per standard landfill operations procedures. The fire department is approximately 10 minutes from the landfill.

7. **62-709.500(5) (c).** A description of types of “prohibited materials” and recyclable debris from the curing pad is requested.

### Response

Clarification from FDEP is needed on the level of detail desired.

8. **62-709.500(5) (g).** A description of operation and maintenance for manual and automatic leachate pumping and removal including: ....

### Response

Engineering drawings/details can be produced to the level needed by FDEP. Further discussion with FDEP is needed to determine actual needs.

9. **62-709.500(7) (a).** Clarification is requested regarding the composting facility surfaces to meet the requirements of this rule. “Crushed concrete” does not appear to meet these requirements.

### Response

Engineering drawings/details can be produced to the level needed by FDEP. Further discussion with FDEP is needed to determine actual needs.

# Food Recovery Project

IG1-14

## County Meeting – FDEP Permit Application Questions Meeting Minutes

10. 62-709.500(7) (b). Clarification is requested regarding the composting facility containment and removal of leachate. ....

### Response

- Some of these questions have been addressed in the permit application.
- Further discussion with FDEP is needed to determine actual needs.
- Double walled leachate holding tanks could be installed.

write  
REFERENCE SECTION  
FOR EACH  
QUESTION

11. 62-709.510. The facility shall be operated in a manner, with any needed measures taken, to control vectors and odors. The list of persons (by name and with phone number) to be contacted in the event of an emergency or to implement contingency plans are requested.

### Response

- Some of these questions have been addressed in the permit application.
- Further discussion with FDEP is needed to determine actual needs. (2 names from the County? 2 names from RMG?)

write  
REFERENCE SECTION  
FOR EACH REQUEST

12. 62-709.530. Record keeping. ...

### Response

- A sample Ag-Bag temperature recording form can be found in Tab V Testing Procedures in the permit application form.
- As described in Tab V, the project will utilize the testing services of the US Composting Council whose laboratories have their own forms for taking compost samples for testing.
- Further discussion with FDEP is needed to determine actual needs.

provide  
RESPONSES TO EACH  
COMMENT BY REFERENCE  
TO a), b)  
(1) & (2)

put  
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### **B. Questions for FDEP**

Specific questions are noted in section 'A' above. A general question is: How much detail does FDEP really need for this pilot project? The more detail required, the more expensive the facility will be to design, build and operate, thus taking it out of the realm of a pilot project in terms of budget. Can we create a facility that meets all human and environmental safety measures within a reasonable budget?

### **C. Set meeting with FDEP to discuss permit application**

Gary Bennett will set the meeting with FDEP and notify project partners.

ord, Kim

From: Loretta Hewlett [LHEWLETT@co.sarasota.fl.us]

Sent: Wednesday, July 31, 2002 2:56 PM

To: Ford, Kim

Cc: Gary Bennett; Pelz, Susan

Subject: RE: Requested Meeting

Kim,

I am going to schedule the meeting for Thursday, August 15, 2002 at 1:30 p.m., at FDEP in Tampa.

P. P. (Pete) Putman, P.E., will attend the meeting from PBS&J.

Thank you for your assistance in scheduling this meeting.

Loretta Hewlett

**Ford, Kim**

**From:** Ford, Kim  
**Sent:** Wednesday, July 31, 2002 12:25 PM  
**To:** 'Loretta Hewlett'  
**Cc:** Pelz, Susan  
**Subject:** RE: Requested Meeting

Can try August 13th-PM,14th-AMorPM, 15th-PM.

-----Original Message-----

**From:** Loretta Hewlett [mailto:LHEWLETT@co.sarasota.fl.us]  
**Sent:** Wednesday, July 31, 2002 11:33 AM  
**To:** Ford, Kim  
**Cc:** Gary Bennett  
**Subject:** Requested Meeting

Kim,

Good Morning. Gary Bennett asked me to contact you regarding a food waste application meeting to be scheduled within the next 2 weeks if possible at your location.

Participation from our area will include; Paul Wingler, P.E., Gary Bennett, Jean Nutter, Mike Sosadeeter, and possibly someone from PBS&J.

Please provide me with a few dates and times that you are available to meet and I will check with our staff.

Thank you for your assistance.

Loretta Hewlett  
(941) 861-1573

[lhewlett@co.sarasota.fl.us](mailto:lhewlett@co.sarasota.fl.us)

Ford, Kim

**From:** Loretta Hewlett [LHEWLETT@co.sarasota.fl.us]  
**Sent:** Wednesday, July 31, 2002 11:33 AM  
**To:** Ford, Kim  
**Cc:** Gary Bennett  
**Subject:** Requested Meeting

Kim,

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Participation from our area will include; Paul Wingler, P.E., Gary Bennett, Jean Nutter, Mike Sosadeeter, and possibly someone from PBS&J.

Please provide me with a few dates and times that you are available to meet and I will check with our staff.

Thank you for your assistance.

Loretta Hewlett  
(941) 861-1573

[lhewlett@co.sarasota.fl.us](mailto:lhewlett@co.sarasota.fl.us)

12 - 15th

13th PM

14th AM & PM

15th PM

**RESOURCE MANAGEMENT GROUP, INC.**

**D.E.P.**  
**APR 16 2002**  
**Southwest District Tampa**

POST OFFICE BOX 1726  
TALLEVAST, FL 34270-1726  
**941-358-7730**  
FAX 941-358-7731

April 15, 2002

Re: Meeting 1:00 PM, Thursday, April 18, 2002 to discuss DRAFT Facility Design and Operations Plan for Food Recovery and Recycling Demonstration Pilot Project in Sarasota County

Dear Attendees:

This binder includes a copy of the DRAFT Facility Design and Operations Plan for a pilot food discards composting facility proposed for Sarasota County. A meeting is scheduled on Thursday, April 18, 2002 at 1:00PM to:

- discuss this draft Plan;
- gather FDEP feedback about the Plan; and
- identify what next steps need to be taken to move the project forward toward a permit being issued.

The meeting will be held at the FDEP Tampa office, 3804 Coconut Palm Drive, 813-744-6100 ext. 382 and the following attendees are planned:

Susan Pelz, FDEP  
Kim Ford, FDEP  
Francine Joyal, FDEP (via phone)  
Gary Bennett, Sarasota County

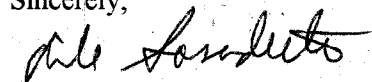
John Banks, SCS Engineers  
Liz Foeller, SCS Engineers  
Mike Sosadeeter, Resource Management Group, Inc.  
Jesse White, Resource Management Group, Inc.  
Bernadette Thavarajah, Publix Supermarkets

The purpose of the pilot Food Recovery and Recycling Demonstration Project is to demonstrate the feasibility of food composting on a small, but scalable, commercial basis. The project will conduct intensive data gathering and reporting to FDEP to develop a body of knowledge about food composting. The proposer anticipates working closely with FDEP to monitor the facility operation and develop best management practices recommendations that may be helpful to FDEP in siting future food recycling/composting operations. This is envisioned as a pilot scale project, which aims to prove the commercial potential of food waste composting.

Resource Management Group, Inc. is proposing to utilize an AG-BAG Eco-POD CT-5® in-vessel compost system. This binder includes information about the Ag-Bag system, proposed equipment needs, proposed food discards collection system, case studies about the Ag-Bag system and the original grant proposal, as well as the DRAFT design/operations plan.

You are invited to review this proposal before the scheduled meeting. We look forward to your input on April 18th. You may also submit comments/questions via email to [msosadeeter@recyclesmart.com](mailto:msosadeeter@recyclesmart.com).

Sincerely,



Mike Sosadeeter, Project Manager

cc. Jodi John, Sarasota County



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

July 16, 2002

Mr. Gary Bennett  
Sarasota County  
4000 Knights Trail Road  
Nokomis, FL 34275

**Re: Food Composting Facility  
Pending Permit #200819-001-SO, Sarasota County**

Dear Mr. Bennett:

This is to acknowledge receipt of your permit application for the food composting research/demonstration/development project to be located at the existing CCSWDC.

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 [Chapters 62-701 and 62-709, Florida Administrative Code (F.A.C.)]. Please provide:

1. **62-701.300.** Please provide information which indicates that each of the prohibitions will not be violated during operation of the facility.
2. **62-701.320(8).** Please publish the attached Notice of Application and provide proof of publication to the Department.
3. **62-709.500(1).** Specifications for all construction materials are requested, including but not limited to: 1) the "crushed concrete" to demonstrate that it will be impervious and contain leachate; and 2) the base material to demonstrate that the mixing pad, compost pad, and curing pad will not rut or settle under the loading of the front-end loader or other heavy equipment.
4. **62-709.500(2)(b) and (c).** Site plans (for construction, not "conceptual") signed and sealed by a professional engineer, including: 1) construction details for berms, walls and floors (for the mixing pit and curing pad) with elevations to show that all leachate will be contained; 2) original elevations and

"More Protection, Less Process"

Printed on recycled paper.

- proposed final contours for the entire facility; 3) plan and cross-sections details for each pump station/holding tank with elevations; 4) details for all drains, valves, piping, and connections from each pump station/holding tank to the existing leachate forcemain; and 5) seasonal high water table elevation.
5. **62-709.500(3).** Design details with elevations and supporting calculations for the stormwater management system.
  6. **62-709.500(4)(f).** A description of on-site fire protection and control provisions is requested.
  7. **62-709.500(5)(c).** A description of types of "prohibited materials" and recyclable debris from the curing pad is requested.
  8. **62-709.500(5)(g).** A description of operation and maintenance for manual and automatic leachate pumping and removal including: 1) operation of all related valves and hoses, 2) method and frequency of cleaning containers and pads, 3) conditions for opening and closing "slide gates", 4) elevations of float switches in pump stations, and 5) use of a pump truck as a contingency only. Calculations for containment are requested for the mixing pad and curing pad to demonstrate all stormwater/leachate will be contained for a 100 year storm.
  9. **62-709.500(7)(a).** Clarification is requested regarding the composting facility surfaces to meet the requirements of this rule. "Crushed concrete" does not appear to meet these requirements.
  10. **62-709.500(7)(b).** Clarification is requested regarding the composting facility containment and removal of leachate. 1) How will stormwater coming in contact with the waste be removed when each "tank" is full for the mixing pad and curing pad? 2) How will stormwater and washdown water be contained for the compost pad from spillage while loading the bags, cutting the bags, and relocating the compost from the compost pad to the curing pad? 3) What is the source of washdown water and where will related piping, hoses, and connections be located? 4) Where will leachate piping, hoses, valves and connections be located for leachate reuse for wetting the mixture, and for automatic pumping to the existing leachate forcemain and storage tank? 5) Is each "tank" intended to meet the leachate storage tank requirements of Rule 62-701.400(6)? (Leachate storage tanks must be designed to meet the requirements of 62-701.400(6), however, pump stations with automatic controls for removal of leachate are not subject to these same requirements.)
  11. **62-709.510.** The facility shall be operated in a manner, with any needed measures taken, to control vectors and odors. The list of persons (by name and with phone number) to be contacted in the event of an emergency or to implement contingency plans are requested.



Mr. Gary Bennett  
Sarasota County

July 16, 2002  
Page Three

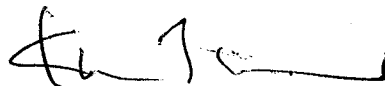
12. 62-709.530. Recordkeeping. a) Forms for all recordkeeping are requested. b) Documentation to demonstrate sampling and testing in accordance with an approved quality assurance plan is requested. c) Frequency of all testing, and of providing records and test results to the Department, is requested. d) List of sampling parameters for the leachate and the compost is requested.

Please provide all responses that relate to engineering required for design and operation, signed and sealed by a professional engineer. Responses that relate to the facility design and operation should be included as part of the Construction/Operation Plan. All replacement pages should be numbered, and with revision date. To expedite the review process, on one set of the revisions to the narrative reports, deletions may be struckthrough (~~struckthrough~~) and additions may be shaded (~~shaded~~) or similar notation method.

"NOTICE! Pursuant to the provisions of Section 120.600, 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 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 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 arrange a meeting with FDEP staff to discuss the items in this letter prior to responding. Please submit your response to this letter as one complete package with an original and two copies of all correspondence. If there are points which must be discussed and resolved, please contact me at (813) 744-6100, extension 382.

Sincerely,



Kim B. Ford, P.E.  
Solid Waste Section  
Division of Waste Management

KBF/ab

Attachment

cc: Mike Sosadeeter, Resource Management Group, Inc.  
Paul Wingler, P.E., Sarasota County  
Susan Pelz, P.E., FDEP Tampa  
Francine Joyal, FDEP Tallahassee

62-110.106(5). Notices: General Requirements.

Each person who files an application for a Department permit or other approval 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.

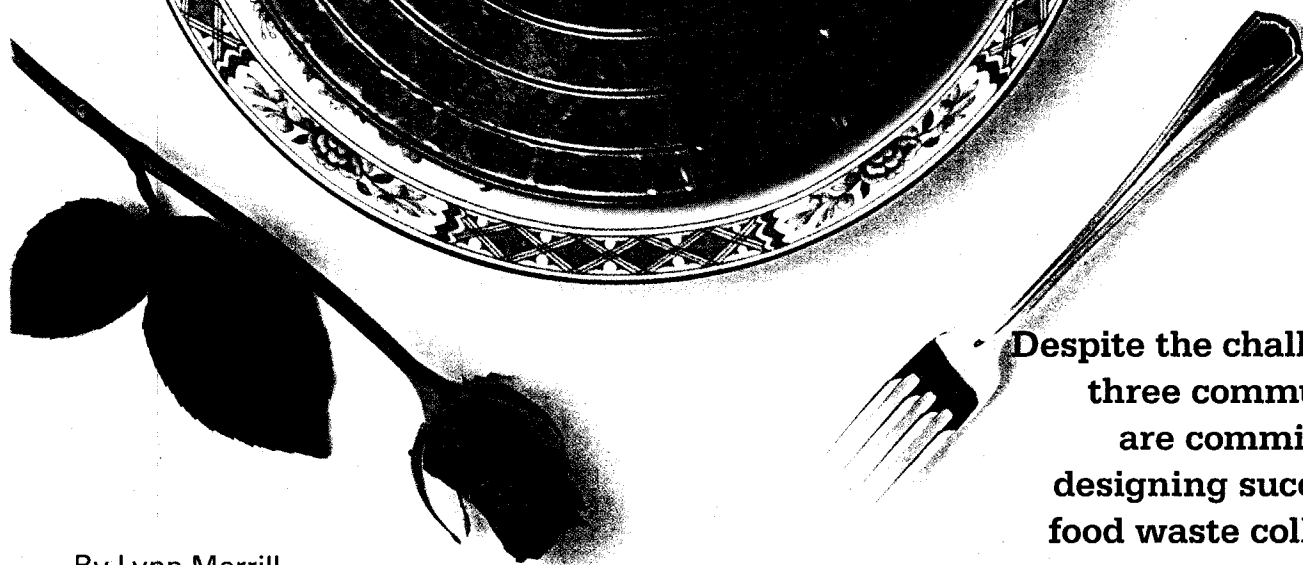
62-110.106(6). Notice of Application. Publication of a notice of application shall be required for those projects that, because of their size, potential effect on the environment or natural resources, controversial nature, or location, or reasonably expected by the Department to result in a heightened public concern or likelihood of request for administrative proceedings. 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 an application for permit from Mr. Gary Bennett of Sarasota County for construction and operation of a food composting facility, located at the existing Central County Solid Waste Disposal Complex, 4000 Knights Trail Road, Nokomis, Sarasota 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.

# ON THE PLATE



By Lynn Merrill

**Despite the challenges,  
three communities  
are committed to  
designing successful  
food waste collection  
programs.**

**E**ACH YEAR IN THE UNITED STATES, more than 21.9 million tons of food waste make a sloshy trip to the landfill.

Yet, the potential for food waste diversion is great. Traditional recycling programs may get municipalities tantalizingly close to meeting diversion mandates of 50 percent or more, but they don't offer the waste diversion opportunities available through commercial food waste collection.

With commercial collection, concentrated quantities of food waste are generated in pre-consumer, industrial settings such as canning or food preparation operations. Grocery stores,

institutional cafeterias and restaurants further offer copious quantities of over-ripe and semi-eaten post-consumer wastes that can be composted or used as animal feed.

## **Starting Off Small**

While it can be challenging to establish economically viable separation programs, several haulers are working within their communities to make it work. Nick Boersema, divisional territory manager for In-Plant Services of Canadian Waste, Strathroy, Ontario, Canada, says his company began a food waste collection pilot because it is seen as a "green earth issue," plus

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"the municipality is committed to it."

Currently, the diversion project is in the planning stages and involves only one large manufacturing company's cafeteria. "You've got a small group of workers, so it's a little bit easier to control quality," Boersema says. But if all goes well, other customers are ready to start similar programs. "There's a demand for [it]," he says.

Yet collecting food waste from even one facility presents difficulties. "The composter that I am using doesn't have the ability to do the richer organics, so things like cooking oils, mayonnaise and butter ... do cause them some grief," Boersema says. "We have to be careful as to what goes into it."

To alleviate any confusion, Canadian Waste will provide education and signs on containers, targeting the food preparation area first. With a smaller pool of workers, it will be easier to control quality, Boersema says.

"As we move into the cafeteria, it will definitely be more challenging. It will be an ongoing, coaching affair, like we have in a lot of our recycling programs."

While separation is more cost-intensive for the hauler, the manufacturing company is motivated by the diversion opportunities and subsequent reduced disposal costs.

Meantime, Boersema is working on including other materials to increase the diversion volume. He is considering "wet paper towels, things that would normally pose recycling problems," he says.

### **Portland's Pair of Pilots**

When Portland, Ore., decided to divert food waste, it addressed higher collection costs by soliciting proposals in 2000.

"We knew there would be costs in collecting food wastes because it requires sending a separate truck and person on a scheduled collection route that was not compact," says Judy Crockett, commercial program specialist with the city's Office of Sustainable Development. "We felt the haulers would be unwilling to incur the additional costs unless we underwrote some of them, so we did."

Portland eventually initiated two pilots starting in 2000 — one with Houston-based Waste Management Inc., the city's largest commercial hauler provid-

ing collection, and the second comprised of several smaller haulers. From there, haulers helped the city to identify the commercial "food producers," who were asked to join the pilot. Eventually more than three dozen businesses participated, including coffee shops, grocery stores and a food wholesaler.

"We were trying to get a fairly broad range, both in size and type, of businesses involved in the pilot so that we could determine which businesses were going to be the right size to be covered with the mandatory ordinance," Crockett says.

In the pilots, which concluded in October 2001, Portland used one- and two-yard front-loading plastic bins, plus 60-gallon carts. All food waste — including meat, food-soiled paper and waxy corrugated cardboard — was collected and sent to a composting operation outside the Metro area. Grease was the only material that was not accepted.

This made consumer education challenging. The city used college students to help run the system and to help educate customers at their sites.

"Portland State University students provided a lot of the follow-up and day-to-day management," Crockett says. Educational materials were trans-

## **FRONT BURNER ISSUES**

Admittedly, food waste is heavy, has a high water content and quickly produces large volumes of odors as it begins to decompose. The waste attracts vectors and usually must meet tight public health codes regulating storage, collection frequency and disposal practices. The contents also are highly acidic, which can damage metal collection containers and refuse trucks.

To further complicate matters, end-markets are skittish about the quality of the material. Broken glass or rusting metals in a cart of vegetable waste destined for animal feed, for example, can render a load unusable. But separating contaminants before or after processing can be difficult.

Adding source-separated food waste to existing composting or animal feed operations also can trigger additional regulatory requirements, which creates an entirely different set of concerns.

For example, California requires composting operations that accept food waste to obtain a solid waste facilities permit, while a composting operation that just accepts green waste may only require a registration permit, depending on the material type and volume.

There is additional concern that food waste mixed with animal feedstock could spread transmittable diseases. So the Food and Drug Administration (FDA), Washington, D.C., along with state and local agricultural governing bodies, have added laws to ensure that feedstock is sanitary.

Despite these challenges, however, some communities persist in their food waste diversion efforts, noting its value.

— Lynn Merrill

lated into English, Spanish and Chinese because those are the three most common languages spoken by Portland restaurant employees.

Nevertheless, more obstacles surfaced, for example, using plastic bags to contain food wastes, Crockett says. "We purchased compostable plastic bags for the first pilot," she says. "We didn't make that available in the second pilot, mainly because it was expensive. In addition, when people run out of the compostable bags, they use whatever bag that happens to be around."

Canadian Waste's Boersema agrees that bags add to the costs of food waste diversion. "When you have a client that used to pay pennies per bag and suddenly they're looking in excess of a dollar [for a biodegradable] bag, that adds costs to an otherwise effective program," he says.

Portland has managed its program without a local food waste processor. "There are no facilities in the Portland area that are permitted to take plate scrapings and food wastes containing meat," Crockett explains. So to ensure the long-term success of the diversion program, the city has to find a local processor to avoid transporting heavy wastes long distances.

"Portland is anticipating having com-

mercial food waste collection processing on-line by the end of next year," she says, which should reduce program costs.

### An Educator's Education

Although food waste collection has been a part of campus life since 1993, Illinois State University, Normal, Ill., faces another kind of educational issue: high turnover among the cafeteria staff and residents. Additionally, because the waste is used for animal feed in addition to sometimes being composted, it must meet strict FDA regulations.

In the beginning, "we wanted to look at what we could do to recycle food wastes," says Paul Walker, professor of animal sciences. "If you take a loaf of bread, a head of cabbage or a chuck of round and try to compost it, it decomposes pretty slowly because of the high nitrogen content and density. If you grind that material up, it increases surface area [and] makes a homogenous product that composts fast."

To experiment, the university decided to put the food waste in pulpers, Walker says. Using a \$180,000 grant from the

Illinois Department of Commerce and Community Affairs, four dining centers were renovated to install the pulpers and establish a utilization project.

To sterilize food waste for animal feed, the university also had to install equipment to treat the food to kill pathogens and to prevent the spread of mad cow disease, Walker adds.

Now, students bus their own trays in the cafeterias, removing glassware, plates and silverware. Remaining materials are sent to the dining center, where the staff pulls off plastics, missed glasses and silverware. Food waste then is scraped into a recycled water trough that transports the material to the pulper.

An extruder process forces pulped material through a machine which, through the force of friction, raises



**VALUABLE FOOD:** Despite the collection challenges, food waste can help cities reach their diversion mandates.

the temperature of the material to 300 degrees and sanitizes the waste for animal feed.

The pulped material is loaded into 30-gallon tubs that are transported daily by truck to the feed center where the food material is used as feed or sent to the university's compost facility.

Currently, "the only time we [use it as] feed is if we're doing a research trial

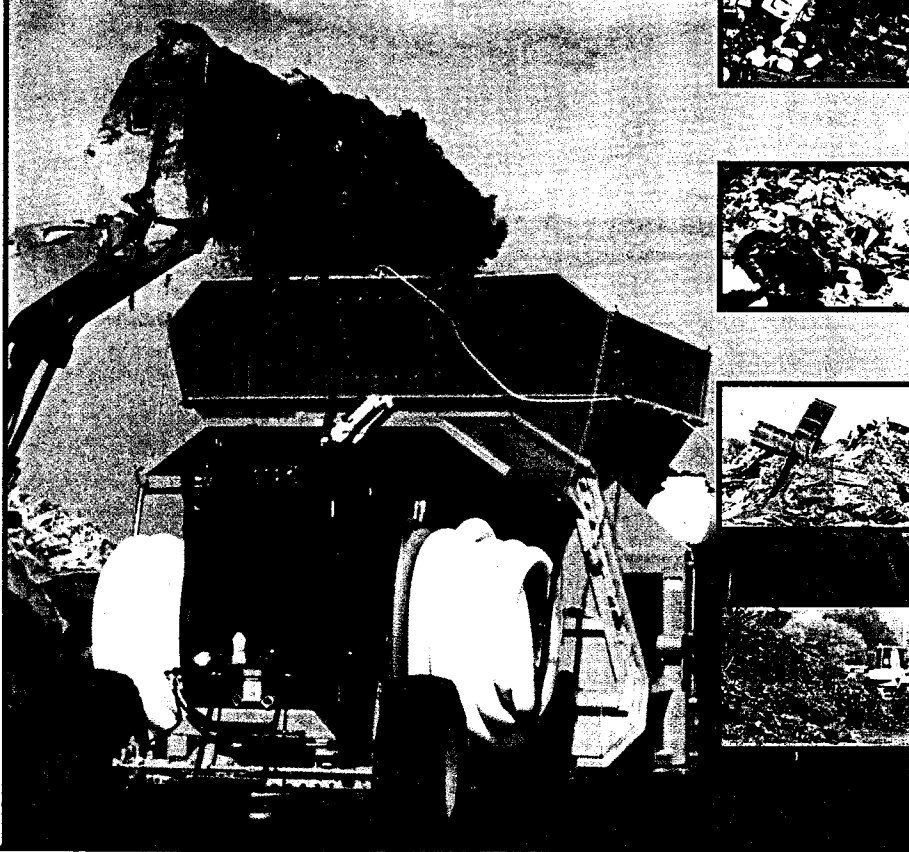
Photo courtesy of the City of Portland, Ore.

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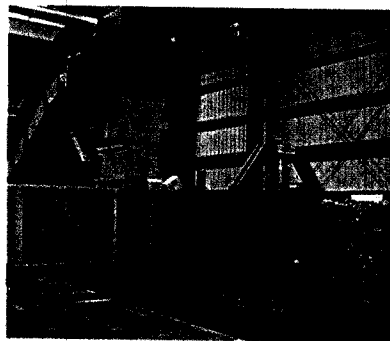
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— normally our food waste is composted," Walker says. But when the school initially started the program in 1993, the pulped waste was fed to cows.

"We did that for three years, replacing 50 percent of [the cows'] energy and all their supplemental protein," Walker says.


Indeed, cafeterias are a high source of food waste. "Initially, students paid one fee for meals, picked all they wanted to eat, then ate it or threw it away," Walker recalls. Approximately 1 ton per day was produced, then pulped.

Later, two cafeterias were converted into pay-as-you-go, and national fast food vendors were added to the program. "If students are paying for every item, they only take what they're going to eat," Walker explains. "We immediately noticed food waste went down."

Instead of 1 ton per day, the university reduced its volume to 1,300 pounds per day, Walker says. However, switching to food vendors that use more non-compostable Styrofoam and plastic increased the waste stream. "We are trying to address that," Walker adds.

Regardless, the cafeterias still produce a considerable amount of waste food, which is mixed with landscape and livestock waste, then composted. The facility produces about 40,000 tons of compost per year, which is given away to residents. Landscapers and greenhouses are charged a \$10 per ton loading fee.

Clearly, food waste collection and diversion can be challenging. Project managers must find processing facilities that can take both meat and vegetable waste along with mixed papers and other materials. Haulers also have to develop a dense enough collection route to make the program cost-effective. Educating consumers and staff about separation also may demand more intensive efforts than traditional recycling programs.

Nevertheless, despite their difficulties, Canadian Waste, Portland and Illinois State University are preparing the ground to grow a successful food waste diversion program. 

*Lynn Merrill is the director of public services for the city of San Bernardino, Calif. Visit [www.wasteage.com](http://www.wasteage.com).*

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SOUTHWEST DISTRICT  
FDEP

Solid Waste Program  
Permitting Application

New Site

Site Name:	FOOD COMPOSTING FACILITY
Site Address:	4000 KNIGHTS TRAIL ROAD
County:	Sarasota
Type/Subcode:	50/21

Existing Site

Site ID:	200819 - 001
Project Name:	FOOD COMPOSTING FACILITY
Type/Subcode:	50/21
Fee Submitted:	\$1000 <input checked="" type="checkbox"/> correct ( ) incorrect
Fee Refund \$	<input checked="" type="checkbox"/> Fee Request \$ <input checked="" type="checkbox"/>

Related Party

Role:	Consultant
Name:	Mike Sosadeeter
Company:	Resource Management Group
Street:	200 S. WASHINGTON BLVD.
City:	Sarasota
Zip Code:	34236
Phone:	941-358-7730

Distribution Date: \_\_\_\_\_

Fee Checked By: E Ford

Date: 6/19/02

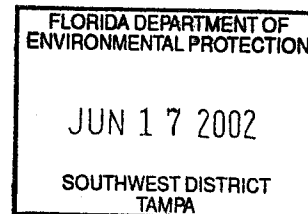


## SARASOTA COUNTY

*"Dedicated to Quality Service"*

June 13, 2002

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318



Re: Food Waste Compost Permit  
Sarasota County, Florida

Dear Mr. Ford:

Please find enclosed with this letter an Application for a Permit to Construct and Operate A Solid Waste Management Facility for the Production of Compost at the Central County Solid Waste Disposal Complex.

Also, enclosed is a check for \$1,000 to permit this facility as a research/development/demonstration project. An FDEP Innovative Recycling Grant in the amount of \$536, 820 is funding this project.

If you have any questions regarding the permit application, please contact Mike Sosadeeter, Project Manager, Resource Management Group, Inc., at (941) 358-7730.

Sincerely,

Gerald L. Bennett  
*Solid Waste Operations Manager*

### Enclosures

cc: Carole Favero, Interim General Manager, Solid Waste  
Jean Nutter, Resource Conservation  
Susan J. Pelz, P.E., FDEP - Tampa  
Mike Sosadeeter, Resource Management Group, Inc.  
Paul Wingler, P.E., Solid Waste Operations





# Department of Environmental Protection

DEP Form #	62-701.900(10)
Form Title	Ap. for Per. to Construct/Operate a Solid Waste Mgmt. Fac. for Prod. of Compost
Effective Date	12-23-96
DEP Application No.	(Filed in by DEP)

## Application for a Permit to Construct ☒ Operate ☒ A Solid Waste Management Facility for the Production of Compost

### General Requirements

Solid Waste Management Facilities for the production of compost or mulch shall be permitted pursuant to Section 403.707, Florida Statutes, and in accordance with Rule 62-709, Florida Administrative Code. A minimum of six copies of the application shall be submitted to the Department district Office having jurisdiction over the facility. Complete appropriate sections for the type of facility for which application is made. Entries should be typed or printed in ink. All blanks should be filled in or marked not applicable. The application shall include all information, drawings, and reports necessary to evaluate the facility. Information required to support the application is listed on the attached pages of this form.

Facility Type: ☐ Existing ☒ Proposed

Materials Processed: ☐ Yard Trash ☐ Manure ☒ Other Solid Wastes ☐ Solid Wastes with Sludge

1. a. Facility Name: Food Composting Facility

b. Facility Location (main entrance): Central County Solid Waste Disposal Complex, Knights Trail Road, Sarasota County

Section 9-16, Township 38S, Range 19E Latitude 27 ° 12 ' 00 " Longitude 82 ° 23 ' 00 "

2. a. Applicant Name (operating authority): Sarasota County

b. Address: 4000 Knights Trail Road Nokomis FL 34275  
Street P.O. Box City State Zip Code

c. Contact Person: Gary Bennett 941-486-2620  
Name Telephone Number

3. a. Authorized Agent/Consultant: Resource Management Group, Inc.

b. Address: 200 S. Washington Blvd. Sarasota FL 34236  
Street P.O. Box City State Zip Code

c. Contact Person: Mike Sosadeeter 941-358-7730  
Name Telephone Number

4. a. Landowner (if different than applicant): \_\_\_\_\_

b. Address: \_\_\_\_\_  
Street P.O. Box City State Zip Code

5. Estimated Cost of Construction, Total: \$ 171,550

6. Anticipated Construction Starting and Completion Dates From: 8/1/02 To: 9/30/02

DEP Form #	62-701.900(10)
Ap. for Per. to Construct/Operate a Solid Waste Mgmt. Fac. for Prod. of Compost	
Form Title	Waste Mgmt. Fac. for Prod. of Compost
Effective Date	12-23-96
DEP Application No.	(Filled in by DEP)

## Required Attachments for Construction/Operation Permit for a Solid Waste Management Facility Producing Compost

### General

Permit application and supporting information shall include the following (62-709.300(3), F.A.C.):

1. A letter of transmittal to the Department;
2. A table of contents listing the main section of the application
3. The permit fee specified in Rule 62-4.05, F.A.C., in check or money order payable to the Department;
4. Six copies, at minimum, of the completed application for, all supporting data, and reports;
5. Engineer seal;
6. Engineer's letter of appointment, if applicable;
7. Copy of any lease agreement, or any other agreement between operator and property owner by which the closing of the facility may be affected; and
8. Proof of publication of notice of application for the proposed activity in a newspaper of general circulation.

Completeness  
Check

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### Specific Attachment Item

The following information items must be included in the application. Please explain if they are not applicable.

NOTE: For facilities that have been satisfactorily constructed in accordance with their construction permit, the information required does not have to be resubmitted for an operation permit if the information has not changed during the construction period.

#### 1. Facility Design (62-709.500, F.A.C.)

☒

NOTE: All maps, plan sheets, drawings, or aerial photographs shall be legible; be signed and sealed by the registered professional engineer responsible for their preparation; be of appropriate scale to show clearly all required details; be numbered, referenced to narrative, titled, have a legend of symbols used, contain horizontal and vertical scales (where applicable), and specify drafting or origination dates; and use uniform scales as much as possible, contain a north arrow, and use NGVD for all elevations.

- a. A map or aerial photograph of the area, no more than 1 year old, unless not substantially changed for older map or photograph, showing land use and zoning within 1 mile of the facility. (62-709.500(2)(a), F.A.C.)
- b. Site Plan (62-709.500(2)(b), F.A.C.)

☒

Note: The site plan shall be on a scale not greater than 200 feet to the inch showing the following:

- (1) Dimensions of the site
- (2) Plan for receiving, procession, production, curing (if any) and storage areas
- (3) Fencing or other measures to restrict access

☒

- c. Topographic Maps (62-709.500(2)(c), F.A.C.)

NOTE: The topographic maps, which may be combined with the plot plan (item 1b), on a scale not greater than 200 feet to the inch showing the following:

- (1) Five foot contour intervals
- (2) Access roads
- (3) Grades required for proper drainage
- (4) Special drainage devices
- (5) Other pertinent information based on intended use of facility

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- d. Report (62-709.500(2)(d), F.A.C.)

- (1) Designed capacity of the proposed facility
- (2) Anticipated type and source of solid waste
- (3) Any additives to be used in the production of compost



DEP Form #	62-701.900(10)
Ap. for Per. to Construct/Operate a Solid Waste Mgmt. Fac. for Prod. of Compost	
Effective Date	12-23-96
DEP Application No.	(Filled in by DEP)

## Compost Facility Data Form

Permit No.: \_\_\_\_\_ Issue Date: \_\_\_\_\_ Expires: \_\_\_\_\_

Facility No. (DEP identification): \_\_\_\_\_

DEP Action: <input type="checkbox"/> Add <input type="checkbox"/> Delete <input type="checkbox"/> Change <input type="checkbox"/> Deactivate Site <input type="checkbox"/> Other		
1. County Sarasota		2. Facility Name Food Composting Facility
3. Date Form Completed June 7, 2002		4. Facility Address 4000 Knights Trail Road, Nokomis, FL 34275
4a. Facility Phone Number 941-486-2600		4b. Facility Site Supervisor Gary Bennett
5. Facility Type <input type="checkbox"/> Composting <input checked="" type="checkbox"/> In-vessel <input type="checkbox"/> Static Pile <input type="checkbox"/> Windrow <input type="checkbox"/> Other. Describe _____		
6. Month/Year Begun October 2002	7. Area within Site Boundary 1.4 Acres	8. Area within Property Boundary 550 Acres
9. Security to Prevent Unauthorized Use <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		10. Weighing Scales <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
11. Waste Processed Per Operation Day 4-8 tons		
12. Maximum Processing Rate 624-1,248 tons		
13. Charge/ton N/A	14. Days operated S M T W T F S	15. Hours/Day Operated 4-8 hours
16. Types of Waste Received <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Agricultural <input type="checkbox"/> Septic Tank <input type="checkbox"/> Sludge <input type="checkbox"/> Yard Trash <input type="checkbox"/> Sewage Sludge <input checked="" type="checkbox"/> Other food waste and ground yard waste		
17. Leachate Recycled <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		17a. Treatment Method Used: Pumped to landfill's leachate treatment system
17b. Discharges to: <input checked="" type="checkbox"/> Surface Waters <input type="checkbox"/> Underground		17c. Class Receiving Water N/A
18 Final Residue is 25-50 % of waste intake		18a. Residue is disposed of at (site name) Local farms.
19. Surface Runoff Collected <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	19a Type of Runoff Treatment N/A	19b. Class of Receiving Waters N/A
20 Number of Staff 2	21 Attendant <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
22. Name and Title of Person Completing Form Gary Bennett, Solid Waste Operations		

Note: All blanks for the numbered items must be filled or marked as not applicable.

DEP Form #	62-701.900(10)
Ap. for Per. to Construct/Operate a Solid Waste Mgmt. Fac. for Prod. of Compost	
Form Title	Waste Mgmt. Fac. for Prod. of Compost
Effective Date	12-23-96
DEP Application No.	
	(Filled in by DEP)

## Certification by Applicant and Engineer or Public Officer

### A. Applicant

The undersigned applicant or authorized representative of Sarasota County is aware that statements made in this form and attached information are an application for a Food Waste Composting Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and, the Department will be notified prior to the sale or legal transfer of the permitted facility.

*Gary Bennett*  
Signature of Applicant or Agent  
Gary Bennett, Solid Waste Operations  
Name and Title

Date: 6/10/02

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

### B. Professional Engineer Registered in Florida or Public Officer as Required in Section 403.707 and 403.7075, Florida Statutes

This is to certify that the engineering features of this solid waste management facility have been designed/examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.

*Paul A. Wingle, P.E.*  
Signature  
Paul A. Wingle, Proj. Mng.  
Name and Title (please type)  
Florida Registration No. 1235 6/10/02  
(Please affix seal)

4000 Knights Trail Rd.  
Mailing Address  
Hokomos, FL 34275  
City, State, Zip Code  
Telephone No. 914/ 486-2600 x 103  
Date: 6/10/02

Construction Cost Estimate: \$171,550

Permit Number: \_\_\_\_\_

Review Date: \_\_\_\_\_

Issue Date: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

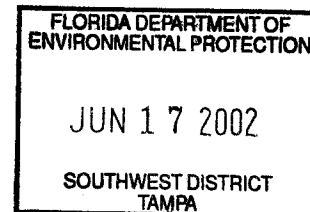


## SARASOTA COUNTY

*"Dedicated to Quality Service"*

June 13, 2002

Kim B. Ford, P.E.  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318



Re: Food Waste Compost Permit  
Sarasota County, Florida

Dear Mr. Ford:

Please find enclosed with this letter an Application for a Permit to Construct and Operate A Solid Waste Management Facility for the Production of Compost at the Central County Solid Waste Disposal Complex.

Also, enclosed is a check for \$1,000 to permit this facility as a research/development/demonstration project. An FDEP Innovative Recycling Grant in the amount of \$536, 820 is funding this project.

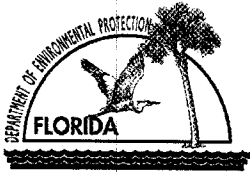
If you have any questions regarding the permit application, please contact Mike Sosadeeter, Project Manager, Resource Management Group, Inc., at (941) 358-7730.

Sincerely,

Gerald L. Bennett  
*Solid Waste Operations Manager*

### Enclosures

cc: Carole Favero, Interim General Manager, Solid Waste  
Jean Nutter, Resource Conservation  
Susan J. Pelz, P.E., FDEP - Tampa  
Mike Sosadeeter, Resource Management Group, Inc.  
Paul Wingler, P.E., Solid Waste Operations



# Department of Environmental Protection

DEP Form #	62-701.900(10)
Form Title	Ap. for Per. to Construct/Operate a Solid Waste Mgmt. Fac. for Prod. of Compost
Effective Date	12-23-96
DEP Application No.	(Filled in by DEP)

## Application for a Permit to Construct ☒ Operate ☒ A Solid Waste Management Facility for the Production of Compost

### General Requirements

Solid Waste Management Facilities for the production of compost or mulch shall be permitted pursuant to Section 403.707, Florida Statutes, and in accordance with Rule 62-709, Florida Administrative Code. A minimum of six copies of the application shall be submitted to the Department district Office having jurisdiction over the facility. Complete appropriate sections for the type of facility for which application is made. Entries should be typed or printed in ink. All blanks should be filled in or marked not applicable. The application shall include all information, drawings, and reports necessary to evaluate the facility. Information required to support the application is listed on the attached pages of this form.

Facility Type: ☐ Existing ☒ Proposed

Materials Processed: ☐ Yard Trash ☐ Manure ☒ Other Solid Wastes ☐ Solid Wastes with Sludge

1. a. Facility Name: Food Composting Facility  
b. Facility Location (main entrance): Central County Solid Waste Disposal Complex, Knights Trail Road, Sarasota County  
Section 9-16, Township 38S, Range 19E Latitude 27 ° 12 ' 00 " Longitude 82 ° 23 ' 00 "
2. a. Applicant Name (operating authority): Sarasota County  
b. Address: 4000 Knights Trail Road Nokomis FL 34275  
Street P.O. Box City State Zip Code  
c. Contact Person: Gary Bennett 941-486-2600  
Name Telephone Number
3. a. Authorized Agent/Consultant: Resource Management Group, Inc.  
b. Address: 200 S. Washington Blvd. Sarasota FL 34236  
Street P.O. Box City State Zip Code  
c. Contact Person: Mike Sosadeeter 941-358-7730  
Name Telephone Number
4. a. Landowner (if different than applicant): \_\_\_\_\_  
b. Address: \_\_\_\_\_  
Street P.O. Box City State Zip Code
5. Estimated Cost of Construction, Total: \$ 171,550
6. Anticipated Construction Starting and Completion Dates From: 8/1/02 To: 9/30/02

DEP Form #	62-701.900(10)
Ap. for Per. to Construct/Operate a Solid Waste Mgmt. Fac. for Prod. of Compost	
Effective Date	12-23-96
DEP Application No.	(Filed in by DEP)

## Required Attachments for Construction/Operation Permit for a Solid Waste Management Facility Producing Compost

### General

Permit application and supporting information shall include the following (62-709.300(3), F.A.C.):

1. A letter of transmittal to the Department;
2. A table of contents listing the main section of the application
3. The permit fee specified in Rule 62-4.05, F.A.C., in check or money order payable to the Department;
4. Six copies, at minimum, of the completed application for, all supporting data, and reports;
5. Engineer seal;
6. Engineer's letter of appointment, if applicable;
7. Copy of any lease agreement, or any other agreement between operator and property owner by which the closing of the facility may be affected; and
8. Proof of publication of notice of application for the proposed activity in a newspaper of general circulation.

Completeness  
Check

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

### Specific Attachment Item

The following information items must be included in the application. Please explain if they are not applicable.

NOTE: For facilities that have been satisfactorily constructed in accordance with their construction permit, the information required does not have to be resubmitted for an operation permit if the information has not changed during the construction period.

#### 1. Facility Design (62-709.500, F.A.C.)

☒

NOTE: All maps, plan sheets, drawings, or aerial photographs shall be legible; be signed and sealed by the registered professional engineer responsible for their preparation; be of appropriate scale to show clearly all required details; be numbered, referenced to narrative, titled, have a legend of symbols used, contain horizontal and vertical scales (where applicable), and specify drafting or origination dates; and use uniform scales as much as possible, contain a north arrow, and use NGVD for all elevations.

- a. A map or aerial photograph of the area, no more than 1 year old, unless not substantially changed for older map or photograph, showing land use and zoning within 1 mile of the facility. (62-709.500(2)(a), F.A.C.)

☒

- b. Site Plan (62-709.500(2)(b), F.A.C.)

☒

Note: The site plan shall be on a scale not greater than 200 feet to the inch showing the following:

- (1) Dimensions of the site
- (2) Plan for receiving, procession, production, curing (if any) and storage areas
- (3) Fencing or other measures to restrict access

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- c. Topographic Maps (62-709.500(2)(c), F.A.C.)

NOTE: The topographic maps, which may be combined with the plot plan (item 1b), on a scale not greater than 200 feet to the inch showing the following:

- (1) Five foot contour intervals
- (2) Access roads
- (3) Grades required for proper drainage
- (4) Special drainage devices
- (5) Other pertinent information based on intended use of facility

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- d. Report (62-709.500(2)(d), F.A.C.)

- (1) Designed capacity of the proposed facility
- (2) Anticipated type and source of solid waste
- (3) Any additives to be used in the production of compost

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>





DEP Form #	62-701.900(10)
Ap. for Per. to Construct/Operate a Solid	
Form Title	Waste Mgmt. Fac. for Prod. of Compost
Effective Date	12-23-96
DEP Application No.	
	(Filed in by DEP)

## Compost Facility Data Form

Permit No.: \_\_\_\_\_ Issue Date: \_\_\_\_\_ Expires: \_\_\_\_\_

Facility No. (DEP identification): \_\_\_\_\_

DEP Action: <input type="checkbox"/> Add <input type="checkbox"/> Delete <input type="checkbox"/> Change <input type="checkbox"/> Deactivate Site <input type="checkbox"/> Other		
1. County Sarasota		2. Facility Name Food Composting Facility
3. Date Form Completed June 7, 2002		4. Facility Address 4000 Knights Trail Road, Nokomis, FL 34275
4a. Facility Phone Number 941-486-2600		4b. Facility Site Supervisor Gary Bennett
5. Facility Type <input type="checkbox"/> Composting <input checked="" type="checkbox"/> In-vessel <input type="checkbox"/> Static Pile <input type="checkbox"/> Windrow <input type="checkbox"/> Other. Describe _____		
6. Month/Year Begun October 2002		7. Area within Site Boundary 1.4 Acres
		8. Area within Property Boundary 550 Acres
9. Security to Prevent Unauthorized Use <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		10. Weighing Scales <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
11. Waste Processed Per Operation Day 4-8 tons		
12. Maximum Processing Rate 624-1,248 tons		
13. Charge/ton N/A		14. Days operated S M T W T F S
		15. Hours/Day Operated 4-8 hours
16. Types of Waste Received <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Agricultural <input type="checkbox"/> Septic Tank <input type="checkbox"/> Sludge <input type="checkbox"/> Yard Trash <input type="checkbox"/> Sewage Sludge <input checked="" type="checkbox"/> Other food waste and ground yard waste		
17. Leachate Recycled <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		17a. Treatment Method Used: Pumped to landfill's leachate treatment system
17b. Discharges to: <input checked="" type="checkbox"/> Surface Waters <input type="checkbox"/> Underground		17c. Class Receiving Water N/A
18 Final Residue is 25-50 % of waste intake		18a. Residue is disposed of at (site name) Local farms.
19. Surface Runoff Collected <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		19a. Type of Runoff Treatment N/A
		19b. Class of Receiving Waters N/A
20 Number of Staff 2		21 Attendant <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22. Name and Title of Person Completing Form Gary Bennett, Solid Waste Operations		


**Note: All blanks for the numbered items must be filled or marked as not applicable.**

DEP Form #	62-701.900(10)
Ap. for Per. to Construct/Operate a Solid	
Form Title	Waste Mgmt. Fac. for Prod. of Compost
Effective Date	12-23-96
DEP Application No.	(Filled in by DEP)

## Certification by Applicant and Engineer or Public Officer

### A. Applicant

The undersigned applicant or authorized representative of Sarasota County is aware that statements made in this form and attached information are an application for a Food Waste Composting Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and, the Department will be notified prior to the sale or legal transfer of the permitted facility.

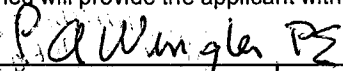
  
 \_\_\_\_\_  
 Signature of Applicant or Agent  
Gary Bennett, Solid Waste Operations  
 \_\_\_\_\_  
 Name and Title

Date: 6/10/02

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

### B. Professional Engineer Registered in Florida or Public Officer as Required in Section 403.707 and 403.7075, Florida Statutes

This is to certify that the engineering features of this solid waste management facility have been designed/examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.

  
 \_\_\_\_\_  
 Signature  
Paul A. Winger, Proj. Mng.  
 \_\_\_\_\_  
 Name and Title (Please type)  
 Florida Registration No. 1235 6/10/02  
 (Please affix seal)

4000 Knights Trail Rd.  
 \_\_\_\_\_  
 Mailing Address  
Nokomis, FL 34275  
 \_\_\_\_\_  
 City, State, Zip Code  
 Telephone No. 914/ 486-2600 x 103  
 Date: 6/10/02

Construction Cost Estimate: \$171,550

Permit Number: \_\_\_\_\_

Issue Date: \_\_\_\_\_

Review Date: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

**Construction/Operation Plan for A Food Waste Composting Facility  
Sarasota County**

**Please replace the sections in your manual with the revised sections listed below:**

**Section I – Construction Operation Plan (entire section)**

**Section II – Site Plan & Maps (entire section)**

**Section IV – ALLU brochure (replace photocopied brochure with attached original)**

**Ford, Kim**

---

**From:** Pelz, Susan  
**Sent:** Tuesday, June 11, 2002 11:24 AM  
**To:** 'Mike Sosadeeter'  
**Cc:** Ford, Kim; Joyal, Francine; McGuire, Chris  
**Subject:** RE: Compost Application Fee

I asked our program attorney if we could do this and, in a nutshell, he said that it's possible, but you will have to submit the full \$5000 and when the permit is issued, we will refund the \$4000. The second year, you would have to submit a permit renewal application (60 days prior to expiration) with \$5000 fee, and when the permit is issued, we would refund the \$4000. Third year, same thing...You all have to decide if it's more trouble than it's worth.

✓ The R&D permit would be for 1 year only, \$1000, and you would have to apply for a new permit at least 60 days prior to expiration.

Susan

-----Original Message-----

**From:** Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]  
**Sent:** Friday, June 07, 2002 10:13 AM  
**To:** Pelz, Susan  
**Subject:** RE: Compost Application Fee

Susan,

Another option we talked about was the 5-year permit with a pro-rated fee of \$1,000 per year with payment one year at a time. RMG would prefer that option.

Let me know what you think,

Mike

-----Original Message-----

**From:** Pelz, Susan [mailto:Susan.Pelz@dep.state.fl.us]  
**Sent:** Thursday, June 06, 2002 3:50 PM  
**To:** Mike Sosadeeter  
**Cc:** Gary Bennett; Jean Nutter; Joyal, Francine; Ford, Kim  
**Subject:** RE: Compost Application Fee

It is my recollection that the fee will be \$5000 for a 5-year permit, or \$1000 for a 1-year R&D permit. If you recall something else, let me know.

-----Original Message-----

**From:** Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]  
**Sent:** Tuesday, June 04, 2002 1:39 PM  
**To:** Pelz, Susan  
**Cc:** Gary Bennett; Jean Nutter  
**Subject:** FW: Compost Application Fee

Susan,

Has there been a decision about the application fee for the Food Waste Composting project in Sarasota? There were several options discussed at the pre-application meeting on April 18, but no decision.

Please advise so we can send in a completed application package.

Thanks,

Mike

-----Original Message-----

From: Gary Bennett [mailto:GBENNETT@co.sarasota.fl.us]  
Sent: Tuesday, June 04, 2002 1:15 PM  
To: msosadeeter@recyclesmart.com  
Cc: Claudette Cobb; Paul Winger  
Subject: Re: Compost Application Fee

Mike,

Please follow up with Susan. Once we know the amount we will request that a check be cut. Usually only takes a few days.

Thanks

Gary

>>> "Mike Sosadeeter" <msosadeeter@recyclesmart.com> 06/04/02 11:26AM >>>  
Jean/Gary,

Do you know what the procedure is for sending payment with the Food Waste Composting Facility application since this is an FDEP funded project through the County? I would like to wrap this up this week and get the permit application in the mail. It requires a "check or money order".

I also do not know the amount of the fee. At our pre-application meeting with DEP, DEP was looking at several options for the fee. I have not heard if a decision was made or not.

I can follow up on this if you would like me to with Susan Pelz.

Let me know,

Mike

Mike Sosadeeter, Project Manager  
Resource Management Group, Inc.  
200 S. Washington Blvd., Suite 10  
Sarasota, Florida 34236  
941-358-7730  
941-358-7731 FAX

**Ford, Kim**

---

**From:** Pelz, Susan  
**Sent:** Monday, May 20, 2002 9:56 AM  
**To:** 'Mike Sosadeeter'  
**Cc:** Ford, Kim; Joyal, Francine  
**Subject:** RE: Vermi-compost Facility Permit

yes, it does.

> -----Original Message-----

> From: Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]  
> Sent: Monday, May 20, 2002 9:12 AM  
> To: Pelz, Susan  
> Subject: RE: Vermi-compost Facility Permit

>  
>  
> Susan,  
>  
> The vermi-compost operation will be at a separate location from the  
> landfill. So, does that require a separate permit application?

> Mike

> -----Original Message-----

> From: Pelz, Susan [mailto:Susan.Pelz@dep.state.fl.us]  
> Sent: Monday, May 20, 2002 8:32 AM  
> To: Mike Sosadeeter  
> Cc: Ford, Kim; Joyal, Francine  
> Subject: RE: Vermi-compost Facility Permit

>  
>  
> A permit will be required, but if it's proposed to take place  
> at the same  
> location as the other operation, you can just submit the  
> information with  
> the  
> other permit application (no additional fee) or modify the  
> "food waste"  
> permit after it's issued (modification fee).

>  
> Susan J. Pelz, P.E.  
> Solid Waste Manager  
> FDEP Southwest District  
> Email: Susan.Pelz@dep.state.fl.us  
> Phone: 813-744-6100 x 386  
> Fax: 813-744-6125

> > -----Original Message-----

> > From: Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]  
> > Sent: Friday, May 17, 2002 3:22 PM  
> > To: Pelz, Susan  
> > Subject: Vermi-compost Facility Permit

> > Susan,

> > RMG, as part of the overall Food Recovery/Reuse Project, is  
> > designing a  
> > commercial scale vermi-compost facility to be placed on a  
> > private piece of  
> > property.

> >  
> > I assume we will need to permit this operation as we are  
> > doing with the  
> > compost facility at the landfill.  
> >  
> > Based on the assumption that a permit will be required, we have been  
> > compiling design/operation information for the vermi-compost  
> > facility as we  
> > did for the landfill compost facility (3-ring binder).  
> >  
> > If a permit for the vermi-compost facility is required we  
> > will complete the  
> > vermi-compost binder. If not, is there another procedure we  
> > should follow.  
> >  
> > Thank you,  
> >  
> > Mike  
> >  
> > Mike Sosadeeter, Project Manager  
> > Resource Management Group, Inc.  
> > 200 S. Washington Blvd., Suite 10  
> > Sarasota, Florida 34236  
> > 941-358-7730  
> > 941-358-7731 FAX  
> >  
> >  
>  
>



Ford, Kim

---

From: Pelz, Susan  
Sent: Monday, May 20, 2002 8:35 AM  
To: 'Mike Sosadeeter'  
Cc: Ford, Kim; Joyal, Francine  
Subject: RE: Food Waste Compost

You need to address the leachate management design and operational procedures, as we discussed in the meeting: how leachate will be contained and either treated or disposed; estimate of how much leachate will be generated; which areas will have impervious surfaces; type of impervious surfaces; etc.

Susan J. Pelz, P.E.  
Solid Waste Manager  
FDEP Southwest District  
Email: Susan.Pelz@dep.state.fl.us  
Phone: 813-744-6100 x 386  
Fax: 813-744-6125

> -----Original Message-----

> From: Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]  
> Sent: Friday, May 17, 2002 3:22 PM  
> To: Pelz, Susan  
> Subject: Food Waste Compost

>

>

> Susan,

>

> In completing the permit application, I never got  
> clarification from your  
> department about #6 Water Quality Standards and there doesn't  
> seem to be any  
> definition in chapter 62-709.

>

> Can you please give me some input about what is required in  
> this section of  
> the permit application.

>

> Thanks,

>

> Mike

>

> Mike Sosadeeter, Project Manager  
> Resource Management Group, Inc.  
> 200 S. Washington Blvd., Suite 10  
> Sarasota, Florida 34236  
> 941-358-7730  
> 941-358-7731 FAX

>

>

**Ford, Kim**

---

**From:** Pelz, Susan  
**Sent:** Monday, May 13, 2002 4:55 PM  
**To:** 'Mike Sosadeeter'  
**Cc:** Ford, Kim  
**Subject:** RE: Food Composting Permit

modified sections which can be inserted into 2 of the binders is fine.

> -----Original Message-----  
> From: Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]  
> Sent: Monday, May 13, 2002 2:53 PM  
> To: Pelz, Susan  
> Subject: Food Composting Permit  
>  
>  
> Susan,  
>  
> We are finalizing our permit application for the food waste composting  
> facility at the landfill in Sarasota County. I am waiting on  
> drawings from  
> the engineers.  
>  
> The modifications to the three ring binder permit application  
> we presented  
> in our pre-application meeting will include just a few sections:  
>  
> I. Construction/Operation Plan -- updated Plan to include  
> DEP comments  
> II. Site Plan & Maps -- new site plan  
> -- aerial map  
> IV. Equipment -- color brochure from ALLU  
> -- brochure of other compost mixers we are considering  
>  
> To save resources, I would like to only send the information for the  
> modified sections for 2 of the four binders you have  
> requested. One set of  
> modified documents for your binder and one set for Kim Ford's binder.  
>  
> I will put together 2 other complete binders so you have four  
> altogether.  
>  
> We will also send you a set of 24"x36" site plan drawings per  
> your request  
> and a set of modifications to Francine Joyal and others at  
> the meeting.  
>  
> If it is acceptable to simply send modified sections for 2 of  
> the binders  
> you already have, please let me know. It you would prefer  
> having 4 new  
> binders, we can produce that as well.  
>  
> Thanks,  
>  
> Mike Sosadeeter  
> Resource Management Group, Inc.  
> 200 S. Washington Blvd., Suite 10  
> Sarasota, Florida 34236  
> 941-358-7730  
> 941-358-7731 FAX  
>  
>

**Ford, Kim**

---

**From:** Alicia Robinson [alicia@recyclesmart.com]  
**Sent:** Thursday, April 25, 2002 4:40 PM  
**To:** Ford, Kim; Pelz, Susan; Ray Dever; Jodi John; Hinton, Jemy; Gary Bennett; Joyal, Francine; bernadette thavarajah; PeggyConnell@CHAC.com; Mike Sosadeeter; Jesse White  
**Subject:** FDEP Meeting Minutes



FDEPMeeting.4.18.02

\_min.doc

Dear Attendees:

Attached you will find the FDEP Meeting Minutes from Thursday, April 18th.

Enjoy  
Alicia, RMG

## **Food Recovery Project**

### **FDEP Meeting Minutes**

Date: Thursday, April 18, 2002  
Location: FDEP 813-744-6100 ext. 382  
Tampa, FL  
Purpose: Present, review and comment on the proposed Facility Design/Operations Plan for the Food Recovery/Composting Project  
Start Time: 1:00 PM  
End Time: 2:30 PM

**Attendees:**

Susan Pelz, FDEP  
Kim Ford, FDEP  
Francine Joyal, FDEP (via phone)  
Jemy Hinton, FDEP  
Gary Bennett, Sarasota County

Jodi John, Sarasota County  
Ray Dever, SCS Engineers  
Mike Sosadeeter, Resource Management Group, Inc.  
Jesse White, Resource Management Group, Inc.  
Bernadette Thavarajah, Publix Supermarkets

### **Discussion**

#### **Site Design – Composting Pad**

- The Ag-Bag POD goes all the way around the compost, creating a sealed in-vessel system.
- The composting area will need a workable surface such as soil cement built on a firm base.
- As long as the composting process will be contained within the Ag-Bag Pod, leachate control will not be necessary for the composting pad.
- Performance of the soil-cement pad will be monitored and may benefit from treatment with sealant if leachate control is necessary in the future.

#### **Site Design – Leachate Management**

- Slope and berm important for leachate head control. Drawings should reflect pitch to sump and then extraction to leachate collection system.
- Leachate may be handled by a holding tank (on-site) and then trucking it to an approved facility/use. Therefore, it may not be necessary to pump into landfill's leachate piping system. "Punching into the leachate system" may be require a landfill permit modification.
  - Issue is capacity of tank
  - Considered leachate collection sump daily removal

#### **Site Design – Storm-water Management**

- No need to have storm water go to leachate tank with exception of curing and initial mixing pad which will need to be managed as leachate.

### **Site Design – Curing Area**

- Leachate control is necessary for the curing pad. Control can be accomplished with a low berm around the perimeter of the pad, with adequate slope to allow collection of leachate. A tarp over the curing pile is not an alternative to leachate collection.
- Permittable to propose starting with a compacted soil-cement pad under the pile, with intensive data gathering regarding leachate generation and quality.
- Compare quality of leachate generated with the cure pile tarped vs. untarped
- Compare quality of leachate with the cure pile tarped vs. untarped
- If at any point in the project FDEP determines the quality or quantity of leachate requires an impervious pad to be utilized, the project can install an asphalt pad for leachate control, does not have to be concrete or geotextile.

### **Site Design – Screening Area**

- Screen only Class A compost and no leachate collection will be necessary for the screening area.

### **Process Design/Operation Plan**

- Test compost while still contained within the POD. If the compost tests as Class A, it does not require being stored in an area where leachate is controlled. Testing for “Code 1” metals will be useful information and may limit or expand possible handling strategies for compost produced. Testing compost just before it is removed from the POD and after curing process will be valuable information to compare results, and the effect of curing on the compost.
- Testing for nitrate may help determine acceptable handling strategies. Further research about this would be helpful, as well as comparison of food derived compost to animal manure management regulations. For example, does food derived compost act like manure and therefore should be subject to CAFO regulations.
- Sweep POD pad and remove any compost to curing pad before starting next POD.
- Indicate the food discards tipped on the pad will be placed into an AgBag by the end of each day.
- Indicate that PODs will not be opened/cut during rain.
- Be more specific of definition of “food” in this project, and indicate all proposed acceptable materials to be composted.
- Any waste containers (Dumpster / Roll off) will need to be covered with rain proofing while not in use.
- Give time range for all process components, e.g., how long will materials remain on POD pad, cure pad, screen area, etc., before moving to next process stage or off-site.
- More information on the Allu mixer, e.g., provide cut sheet drawings.
- Note that record keeping will be in tons, and that the project will also keep track of yards to develop data on size reduction factors.
- Describe all possible ways of handling material, so that the project is not held to one particular way later on in the project if one strategy does not work. For example, indicate collection containers may be lined or unlined, and the procedure for managing containers using each strategy.
- Paragraph 11 – expand to develop a procedure at the composting site of how to handle materials that are not acceptable or prohibited from the composting process. E.g., a spotter

will look for materials that are unwanted and note receipt of these materials for educating the generator not to include these items in the future. If the spotter sees prohibited materials, such as plastic bags or other non-compostable debris the spotter will safely remove the item and dispose of it at an approved disposal or recycling facility.

- Explain how the project team will deal with odor during tipping process.

### **General Comments**

- Whole site will have crushed concrete base or equivalent.
- The leachate tank on the pre-application drawings is the Landfill's existing tank.
- At any point in the process that the compost tests as "Class A" it can be used anywhere without further leachate management requirements.
- The project team may contact Hardee County whose prison system may have experience with operating the AgBag system.
- Name all the parties involved with the project as well as roles and responsibilities.
- Submit four (4) copies of the permit application to FDEP – Tampa (1 set of 24"x36" drawings, the rest can be smaller drawings), and one copy to Francine Joyal (FDEP-Tallahassee).
- **Drawings must be signed and sealed by a PE**
- Discuss with FDEP any philosophical changes in approach before doing them.
- Plan can have phase I/II.
- DEP will get back to us on fees and possible pro-ration or special permit fees.

### **Timeline**

- After submission, FDEP has 30 day to respond
- After approval, there is a public notice period of intent to issue - 14 days



4/18/02

1P

SARASOTA Composting

GB. GRANT

J.W. GENERAL INFO

MS SITE LAYOUT / LEACHATE COLLECTION

DISCUSSED ~~REVIEWED~~ EQUIPMENT

→ BAGS ARE CONSIDERED LCRS

LCRS

SETBACKS FROM WATER

FROM BAGS & CURING PILES

MS. SOIL CEMENT PAD

Condition NO CUTTING BAGS DURING RAIN →

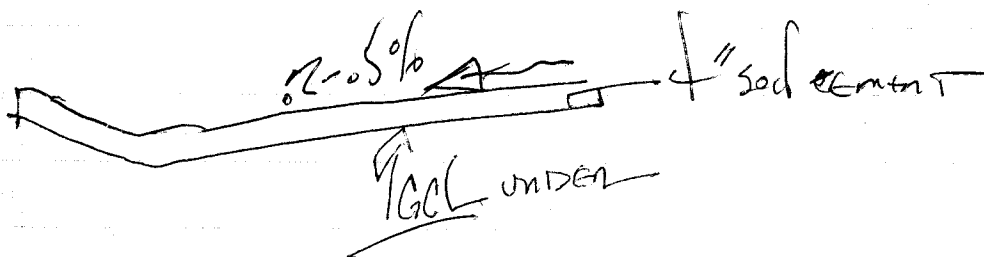
CURING AREA - MUST HAVE LCRS

IF TARPED THEN LEACHATE MINIMAL

ASPHALT →

SAMPLE NITRATE & METALS IN BAGS

IF OK THEN NO ~~ASPHALT~~ ASPHALT AND SOIL CEMENT





~~Sampling From SACS  
will allow cover on  
only~~

Sampling  
Allows use  
of a "sulfonamide" PAD.  
sloped with LCRS

NO LEACHATE COLLECTION  
UNDER SACS IF  
NOT OPENING SACS IN RAIN  
AND RELOCATE COMPOST  
in same day  
AND CLEAN THE PAD  
PRIOR TO REUSE SAME DAY

SWEEP PAD BEFORE REUSE on PAD

SPOTTING PROCEDURES

Location on site plan

Responsible person

Class I spatial & removal  
of unacceptable waste

Instructions ?

Admin. Instruction for  
Review & changes ?

List of "food wastes"

PAPER, BUT NO GLASS,  
PLASTIC, METAL

Waste Collection / Disposal  
"BAGS" OF FOOD WASTE.

SC → INTENT TO ISSUE REQUIRES  
CERT CONSTRUCTION → OPERATION  
FEES ? CAN SC PERMIT  
BE PRORATED  
4 COPIES

## Food Waste Recycling/Composting

Sanasota Co grant - pilot project at the LF

Pre application meeting for food composting

Food waste  $\Rightarrow$  99% of waste generated, 18% of disposal

Innovative Recycling Project -  
At the Sanasota Central Co  
Feedstock from Publix

48 cu/yk  $\frac{1}{2}$  Food  $\frac{1}{2}$  YT

2-3 months for bag to be done

30 day curing

screening  $\Rightarrow$  market  
3-4 wks to fill bag

testing -

collect - 3 times /wk

load ~~over~~ bags daily - nothing on pad except  
yard waste ~~at~~ At end of day

1.1 ac

leachate collection  $\Rightarrow$  curing area & mixing pad

outside gutter monitoring @ LF

soil cement base  $\Rightarrow$

1 yr project w/ possible

Curing Area -

- will ~~give~~ it for this project
- collect data on leachate quality & quantity
- Asphalt, concrete, (soil cement maybe)
  - soil cement - how impermeable is it?

Ag Pad - operational procedures for cleaning  
after removal of material

Recordkeeping - tons

timeline -

where located @ site

wash out containers? container liners

- \* SW other? \$1000
- \* operation permit prorotation?
- \* SC - compost insw \$5000 prorotation?

4 copies, 1 to Francine

**RESOURCE MANAGEMENT GROUP, INC.**



**D.E.P.**

**APR 16 2002**

**Southwest District Tampa**

POST OFFICE BOX 1726  
TALLEVAST, FL 34270-1726  
**941-358-7730**  
FAX 941-358-7731

April 15, 2002

Re: Meeting 1:00 PM, Thursday, April 18, 2002 to discuss DRAFT Facility Design and Operations Plan for Food Recovery and Recycling Demonstration Pilot Project in Sarasota County

Dear Attendees:

This binder includes a copy of the DRAFT Facility Design and Operations Plan for a pilot food discards composting facility proposed for Sarasota County. A meeting is scheduled on Thursday, April 18, 2002 at 1:00PM to:

- discuss this draft Plan;
- gather FDEP feedback about the Plan; and
- identify what next steps need to be taken to move the project forward toward a permit being issued.

The meeting will be held at the FDEP Tampa office, 3804 Coconut Palm Drive, 813-744-6100 ext. 382 and the following attendees are planned:

Susan Pelz, FDEP  
Kim Ford, FDEP  
Francine Joyal, FDEP (via phone)  
Gary Bennett, Sarasota County

John Banks, SCS Engineers  
Liz Foeller, SCS Engineers  
Mike Sosadeeter, Resource Management Group, Inc.  
Jesse White, Resource Management Group, Inc.  
Bernadette Thavarajah, Publix Supermarkets

The purpose of the pilot Food Recovery and Recycling Demonstration Project is to demonstrate the feasibility of food composting on a small, but scalable, commercial basis. The project will conduct intensive data gathering and reporting to FDEP to develop a body of knowledge about food composting. The proposer anticipates working closely with FDEP to monitor the facility operation and develop best management practices recommendations that may be helpful to FDEP in siting future food recycling/composting operations. This is envisioned as a pilot scale project, which aims to prove the commercial potential of food waste composting.

Resource Management Group, Inc. is proposing to utilize an AG-BAG Eco-POD CT-5® in-vessel compost system. This binder includes information about the Ag-Bag system, proposed equipment needs, proposed food discards collection system, case studies about the Ag-Bag system and the original grant proposal, as well as the DRAFT design/operations plan.

You are invited to review this proposal before the scheduled meeting. We look forward to your input on April 18th. You may also submit comments/questions via email to [msosadeeter@recyclesmart.com](mailto:msosadeeter@recyclesmart.com).

Sincerely,

Mike Sosadeeter, Project Manager

cc. Jodi John, Sarasota County

ord, Kim

**From:** Pelz, Susan  
**Sent:** Monday, April 15, 2002 2:38 PM  
**To:** 'Loretta Hewlett'  
**cc:** Gary Bennett; Joyal, Francine; Ford, Kim; msosadeeter@recyclesmart.com; jbanks@scsengineers.com  
**Subject:** RE: Pre-Application Meeting

es, Francine will be attending via teleconference. The number is 813-744-8199 (I think). Francine, you should be able to just call in and get us. We will have a speaker phone. Thanks for the attendance list.

Susan

-----Original Message-----

**From:** Loretta Hewlett [mailto:LHEWLETT@co.sarasota.fl.us]  
**Sent:** Friday, April 12, 2002 11:06 AM  
**To:** Pelz, Susan  
**Cc:** Gary Bennett; Joyal, Francine; Ford, Kim; msosadeeter@recyclesmart.com; jbanks@scsengineers.com  
**Subject:** Pre-Application Meeting

Susan,

Good Morning. Regarding the meeting scheduled for April 18th at 1 p.m.

I have been asked the following questions:

*Will Francine Joyal attend by teleconference?*

*Will the meeting room have a speaker phone available?*

This will confirm attendance for the following:

Gary Bennett, Sarasota County  
 John Banks, SCS Engineers  
 Liz Foeller, SCS Engineers  
 Mike Sosadeeter, Resource Management Group, Inc.

Please advise. Thank you.

Loretta Hewlett  
 941.486-2600, ext. 100  
[lhewlett@co.sarasota.fl.us](mailto:lhewlett@co.sarasota.fl.us)

/16/02

Ford, Kim

**From:** Loretta Hewlett [LHEWLETT@co.sarasota.fl.us]  
**Sent:** Thursday, April 11, 2002 8:09 AM  
**To:** Pelz, Susan  
**Cc:** Gary Bennett; Joyal, Francine; Ford, Kim; msosadeeter@recyclesmart.com; jbanks@scsengineers.com  
**Subject:** RE: Requested Meeting-composting

Susan,  
This e-mail will confirm the above-mentioned meeting for Gary Bennett on Thursday, April 18th at 1 p.m., at FDEP in Tampa.

Thank you.

Loretta Hewlett

**Ford, Kim**

---

**From:** Butera, Robert  
**Sent:** Wednesday, March 20, 2002 5:06 PM  
**To:** 'msosadeeter@recyclesmart.com'  
**Cc:** Pelz, Susan; Ford, Kim  
**Subject:** FW: Food Waste Composting

Please note comments and I do suggest a file review. I believe this is intended to take place at the Central County Landfill, and if so Gary Bennett or his designee should participate in the preapplication meeting. Hope this helps.....If you have any more questions do not hesitate to send me an e-mail.

-----Original Message-----

From: Pelz, Susan  
Sent: Wednesday, March 20, 2002 4:55 PM  
To: Butera, Robert  
Cc: Ford, Kim  
Subject: RE: Food Waste Composting

I think these are the correct forms. They should do a file review and contact us for a pre-application meeting prior to submittal of their application.

> -----Original Message-----

> From: Butera, Robert  
> Sent: Wednesday, March 20, 2002 3:00 PM  
> To: Pelz, Susan  
> Cc: Ford, Kim  
> Subject: FW: Food Waste Composting

> FYI - I beleive all forms and application noted are all  
> that is required. We may want to include the construction  
> certification form or wait until they apply for a permit or  
> permit modification. There is a \$500,000 grant involved so I  
> believe this will get a lot of publicity. Please provide me  
> your comments and I will respond.

> -----Original Message-----

> From: Mike Sosadeeter [mailto:msosadeeter@recyclesmart.com]  
> Sent: Wednesday, March 20, 2002 2:33 PM  
> To: Butera, Robert  
> Subject: Food Waste Composting

> Dear Mr. Butera.

> Resource Management Group, Inc. is working with Sarasota  
> County to design,  
> construct and operate a food waste composting operation at the County  
> landfill. The is a part of an FDEP funded innovative grant  
> pilot project  
> called the Food Waste Recovery Project, IG1-14.

> We have begun the development of the facility design and  
> operation plan for  
> the facility. I want to be sure we are utilizing all of the  
> correct permit  
> applications and accompanying documents.

> I have:

> \*form 62-701.900(10)



> \*form 62-709  
> \*form 62-701  
>  
> Are there other forms and or documents I need to be aware of  
> other than  
> those referenced within the above mentioned forms?  
>  
> Thank you,  
>  
>  
> Mike Sosadeeter, Project Manager  
>  
>



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## **Permitting Information** **Solid Waste Permitting**

### Types of Solid Waste Permits

The DEP district offices take responsibility for issuing solid waste permits. The permits that they may issue are:

- **General permit.**
- A **construction permit** is necessary for the construction of a new solid waste management facility, or substantial modification of an existing facility.
- An **operation permit** is necessary prior to the operation of a new facility or for an existing facility at the time of permit renewal. After all construction has been completed and before accepting any solid waste, the owner or operator must submit a certification of construction completion, Form 62-701.900(2), signed and sealed by a professional engineer, with all modifications of the record drawings. Arrangements must be made for Department representatives to inspect the facility in the company of the permittee, the engineer, and the proposed facility operator.
- A **construction/operation** may be obtained in place of a separate construction permit and separate operation permit, but must follow the same criteria
- A **closure permit** is necessary for the closing and long-term care of a solid waste management facility.

In addition to the permit types which may be issued, there are categories of permits which have separate criteria and requirements. The categories are landfills, construction and demolition, composting, materials recovery facilities, solid waste transfer station, solid waste combustor ash management, and waste tires. Each of these items are summarized separately.

[What you as a Tire Dealer should know about Florida's Waste Tire Law.](#)

### Other Applicable Permits

The Department does not evaluate compliance with local zoning or land use ordinances when determining whether to issue or deny any permit. Issuance of a permit does not relieve an applicant from compliance with local zoning or land use ordinances, or with any other laws, rules, or ordinances. You must check with your local government

## Solid Waste Permit Fees

TYPE	CONSTRUCTION	OPERATION	CLOSURE
Landfill, Class I	\$10,000	\$10,000	\$7,500
Landfill, Class II	\$10,000	\$10,000	\$7,500
Landfill, Class III	\$ 6,000	\$ 4,000	\$4,000
Waste-To-Energy Plants (Not covered by Power Plant Siting Act)	\$10,000	\$10,000	N/A
Other Resource Recovery	\$ 2,000	\$ 1,000	N/A
Compost-Yard Trash or Manure	\$ 2,000	\$ 1,000	N/A
Compost-Municipal Solid Waste	\$ 5,000	\$ 3,000	N/A
Material Recovery Facility	\$ 2,000	\$ 2,000	N/A
Construction & Demolition Debris Disposal Facility	\$ 2,500 (Includes Construction, Operation & Closure)		
Construction & Demolition Debris Recycling Facility	\$ 2,000 (Includes Construction, Operation & Closure)		
Soil Treatment Facility Stationary	\$ 2,000 (Includes Construction, Operation & Closure)		
Waste Tire Processing Facility	\$ 1,250 (Includes Construction, Operation & Closure)		
Waste Tire Collection Center	\$ 500 (Includes Construction, Operation & Closure)		
Waste Tire Small Processing Facility	\$ 500 (Includes Construction, Operation & Closure)		
Other Solid Waste Facilities	\$ 1,000	\$ 500	\$1,000

*Food composting*

**Ford, Kim**

---

**From:** Joyal, Francine  
**Sent:** Thursday, March 07, 2002 9:50 AM  
**To:** Butera, Robert; Henricks, Ron  
**Cc:** Clark, Jan Rae; Pelz, Susan; Ford, Kim  
**Subject:** RE: Composting of Food Waste Grant - Sarasota County

Bob,

Link to Selection memo is

<http://www.dep.state.fl.us/waste/categories/recycling/documents/igg01/memograntsnotify.PDF>

Link to Sarasota County's full proposal is

<http://www.dep.state.fl.us/waste/categories/recycling/documents/igg01/fullprop/sarasota.pdf>

Francine

-----Original Message-----

**From:** Butera, Robert  
**Sent:** Thursday, March 07, 2002 9:40 AM  
**To:** Henricks, Ron  
**Cc:** Joyal, Francine; Clark, Jan Rae; Pelz, Susan; Ford, Kim  
**Subject:** Composting of Food Waste Grant - Sarasota County

We have been approached by Sarasota County as to requirements for permitting for the referenced grant. I have not gone on-line to check if the grant is identified. What can you tell us about this grant and is it available on-line. Thanks, Bob.

- 1) Applicant County: Sarasota County, Florida
- 2) Primary contact person: Jodi John
- 3) Complete Address: Resource Conservation  
Environmental Services  
Sarasota County Government  
1660 Ringling Blvd.  
Sarasota, FL 34236
- 4) Telephone (including SunCom number): 941-364-4663
- 5) E-mail address: jjohn@co.sarasota.fl.us
- 6) Grant Request Amount: \$536,820
- 7) Project Timeframe (months): 24 months
- 8) Project Abstract:

Sarasota County Government seeks funding to develop Florida's first integrated food discard management program using an intrinsic value hierarchy. Significant quantities mean significant opportunities. FDEP estimates 1.3 million tons of food waste was collected in Florida in 1998.

The program will collect food discards generated by supermarkets, restaurants, and institutions (e.g., schools, prisons) and distribute it within the community based on the food's highest and best value.

1. **Food for People:** food that is of highest quality will be collected by a local food bank.
2. **Food for Animals:** food that is of good quality, but not suitable for human consumption will be collected by the food bank in special containers and aggregated for pick up by local farmers.
3. **Food for Plants:** food that is not suitable as food will be collected and processed through composting and vermi-composting into valuable soil amendments.

Each of these program components will function independently, yet complement one another, and form a food discards management pyramid. This powerful diversion strategy, which is unique in Florida, will capture the greatest value in food discards from an environmental, social, and cost-effective standpoint. In addition to food, this project will recover: food soiled paper, yard waste, unmarketable paper (e.g., paper materials recovery facility (MRF) residue), waxed cardboard, and other components of the MSW stream, qualifying this project as addressing "targeted materials."

## **Innovative Technologies and Processes**

Food discards account for 5% to 10% of the overall municipal solid waste stream (exclusive of industrial discards) and offers a huge opportunity for recovery of value from materials otherwise destined for disposal as waste.

### *Not in common use in Florida.*

- **Integrated Hierarchy.** Not one Florida county has implemented a sustainable, integrated food discards management hierarchy.
- **Source Separation.** There are no permitted source-separated food discards composting programs utilizing post-consumer materials currently operating in Florida. Only Sumter county composts any appreciable quantity of food discards, and there the food is mixed with MSW. The product, a mixed-municipal-solid-waste compost, has limited end-market applications.
- **Vermi-composting** is not in common use in Florida on a commercial scale and, up until now, has not been used as a technique for increasing the value of compost. In addition, the vermi-composting system will be constructed of recycled and/or reused materials (minimum 25%).
- **Innovative Carbon Sources.** We will develop procedures for incorporating innovative carbon sources (food-soiled paper, wax cardboard, unmarketable paper) for compost bulking while maintaining quality controls. While attempts have been made to incorporate these challenging materials, this project will combine evaluation of recipe formation with processing method to arrive at sustainable programs that will last beyond the grant period.

### *Novel application of an existing technology or process.*

- **Hierarchy of Diversion.** Hierarchical use of food discards, source reduction (food for people), food reuse (as animal feed); food recycling (including onsite in-vessel composting and vermi-composting). While each of these individual components have been used throughout the ages to manage food discards, our holistic, integrated approach is a novel one.
- **Co-Collection Efficiency.** Some near-expiration foods that are appropriate for animal feed can be co-collected with food for people, while maintaining compliance with FDA and supermarket guidelines for food safety. This novel approach will save farmers time and increase the supply of fresh food for animals.
- **Permit.** The project will seek a solid waste permit to accept and compost food discards and develop guidance for others seeking permits to compost source-separated organic MSW. The permit process is used to protect human health and the environment. The Project Team will work closely with FDEP to share information about successes and challenges in the permit process, and will develop proposals for streamlining this process to stimulate investment in food discards composting, should FDEP choose to do so.

### *Overcoming obstacles to recycling/waste reduction in new or innovative ways.*

- **Compost Markets (Value).** Compost is a historically low priced commodity in Florida. Because of this, many operators minimize investment in composting and sell inferior, typically un-finished materials. These poor products compound market disinterest in compost. We overcome this obstacle by creating a compost that is more beneficial to end-users' horticultural needs.

- ✓ This project utilizes food with urban plant debris, to create a finished product with more nutritional value than yard trash compost.

- ✓ Vermi-composting will be used to “finish” the composting process. Worms have a way of improving the value of compost for plants, and vermi-compost and worm castings command a premium price.
- **Overcoming Collection Challenges.** Two of the major obstacles to food discards management is the limitation on collection infrastructure and failure to integrate collection strategies.
  - ✓ The project also implements an innovative collection system for collecting compostable food discards, focusing on transportation efficiencies.
  - ✓ The project will evaluate composting food discards at the generator’s site (its origin), and transporting partially-composted materials. It is anticipated this will reduce odors, volume, and weight of materials that need to be transported.
- **Programmatic Obstacles.** The Project Team will seek guidance from the Florida Organics Recycling Center of Excellence (FORCE) and other existing resources to build off existing knowledge and to avoid making mistakes demonstrated by previous organics recycling projects. Areas of innovation include demonstration of new composting recipes using food discards and urban plant debris, implementation of original management strategies, and use of non-traditional carbon sources. Innovative demonstrations will include:
  - ✓ **Recipes.** Source separated food composting has been limited by lack of knowledge about recipe formation. Recipes are the proportional combination of several materials to make a mixture of materials that has the chemical and physical characteristics to promote optimal decomposition by aerobic organisms and to avoid malodorous emissions. The project will develop recipes that incorporate unique materials (e.g. wax cardboard, which has only been co-composted with food waste on a limited basis in Florida). Furthermore, all recipes will be shared through the project’s web site, and in presentations at industry events.
  - ✓ **Proper Daily Management** The management of food discards through composting and vermi-composting has been attempted many times before. Odor suppression, which will be address by all proposed systems, is the key obstacle to expanded composting. To avoid odor generation, the project will demonstrate specialized aeration equipment (such as innovative turners and a modified passive/active aerated static pile), mobile small-scale in-vessel composting systems, and vermi-composting.
- **Harvesting Worm Castings** is a challenge because you do not want to harvest your worms with your castings, and you do not want to disturb your worms while they are actively working the material. To overcome this challenge, we will lease a specialized castings extractor that allows worm castings to be removed from the system without harvesting worms. It is hoped this will increase operational efficiency. The process also results in increased aeration of the worm beds.
- **Odor Suppression.** Odor has been the primary cause of composting operation failure. The Project Team will build on the successes of the Massachusetts and Vermont food discards composting projects, which have been lauded by the Environmental Protection Agency as model projects that are market based, low technology, and cost-effective.
- **Quality Assurance.** The Project Team will overcome concerns about compost quality by testing finished product for quality, including nutrient analysis, compost maturity, problem metals, and pathogens. The Florida Organic Growers Association (FOG) is interested in participating in the project to help clarify if the project can produce compost from municipally generated organic discards that meets the stringent requirements of this environmentally oriented group.

Both the overall approach and system components apply novel approaches and new technologies to overcome obstacles to effectively manage food discards. The project will provide the most comprehensive and integrated food discard management system ever implemented in Florida.

## **Environmental and Economic Benefits and Cost effectiveness.**

### *Environmental benefits*

Because the project is built on a food management hierarchy, the embodied energy of the food is captured on all levels, and materials can be used in their highest and best use. Embodied energy represents all the environmental and economic inputs required to bring a product into being.

### *Methodology.*

- **Source Reduction.** People do not eat “recycled” food, thus this project is source reduction at its core. Each item that can be diverted to use as food-for-people has the greatest environmental impact, because this food has already been produced to the point of readiness for human consumption. Thus all the production, transportation, and distribution impacts are already embodied in the item. In a holistic sense, providing food for people has a great environmental return, as well, because providing food for people responds to a basic human condition, and fulfills the need for fresh nourishment. The *Food for Animals* program also provides source-reduction.
- **Green House/Global Warming Gas Reductions.** Using EPA guidance, the Project will be among the first in the nation to quantify diversion in terms of preventing/offsetting the production of global warming gasses. The composting component will reduce greenhouse gas production by approximately 800 metric ton carbon equivalents (MTCE) annually, based on the designed capacity of 50-60 tons per week of food discards.
- **Energy Innovation (Pollution Prevention).** The Project Team plans to utilize solar power generation options for operating the in-vessel system. This would enable the mobile in-vessel system to be operated without electrical hook-ups or noise generation. Further, it allows the system to operate without generating greenhouse gas emissions or pollution.

### *Toxicity/Hazards.*

Composting food discards aerobically can result in many environmental toxicity benefits by reducing the chemical reactions that occur as food discards break down in landfills and other waste treatment systems. Composting results in reductions in:

- **Methane generation.** Methane is a flammable gas that must be managed when generated.
- **Leachate generation.** Leachate generated in landfills must be treated and disposed of properly.
- **Odors and Leachate** in solid waste compactors and dumpsters, where health concerns can arise.
- **Vermin/vectors** at waste management facilities, e.g., landfills, due to reduced food attractants.

### *Economic Benefits*

- **Jobs.** Composting facilities employ four times more people on a per-ton basis than landfills (WasteCap Wisconsin). The Sarasota project will create two to three new permanent full-time jobs, will be replicable, and will demonstrate economic feasibility of commercial food discard composting and vermi-composting.
- **Decreased Generator Costs.** The project aims to reduce generator costs by \$20 - \$40 per ton (depending on internal costs to perform source separation).
- **Commercialization of Source-Separated Organics Management.** The project plans a market-based approach to assure on-going success. This includes a tip fee for the compost operator, disposal savings for the generator, and compensation to the hauler. An anticipated tip fee of \$20/ton is \$44/ton below County landfill tip fees. In addition, the proposed facility location is within seven miles of approximately 60% of the County's population.



- **Low Cost Animal Feed.** Two of 16 Publix Stores currently source separate material for farmers. The project will analyze why these arrangements are effective and permitted, and build on this success to encourage other stores (both Publix and other supermarket chains) to support this end-use. The Project Team is mindful of the changing regulations in this component, and has limited the scope and extent of dependence on this sector to utilize food discards.
  - ✓ **Food Pelletization.** The concept of pelletization and other value-added preparation will be considered. However, the Project Team is aware that, most currently operating food-to-feed pelletization programs require a minimum of 80 to 150 tons per day to be economically feasible, and multi-million dollar infrastructure development. Such a facility is beyond the scope of this proposal. Currently, the Team is aware of only one jurisdiction considering this technology: Reedy Creek, which is home to Disney World and related Theme Parks. While there is much to learn from Reedy Creek's experiences, the Project Team believes that the collection infrastructure issues facing medium sized counties require further innovation to be cost effective.
- **Building Community Value.** The project will serve the community by partnering with and incubating community entrepreneurs in the manufacture and sale of worms, worm castings, and compost as a value-added soil amendments. Whereas bulk yard waste compost has a retail value of \$0 plus shipping to \$15.00, delivered, per cubic yard, worm castings are sold for up to \$ 2.00 per lb. in small quantities or by bulk at approximately \$35.00 to \$70.00 per cubic yard.

#### *Cost-effectiveness*

- **Food Value.** Diversion of approximately 600,000 lb. of perishable food for people, holds a value of approximately \$1,008,000.00 (per All Faiths Food Bank average grocery food values), and will provide approximately 350,000 to 400,000 meals to area residents in need.
- **Feed Value.** Diversion of approximately 10,000 lb. of perishable food for animals will result in approximately 100 lb. of meat donated to area food banks. Thus the market value of this component alone effectively provides a two-to-three-fold return on investment.
- **Cost Avoidance.** Composting and Vermi-composting will result in annual cost avoidance of approximately \$114,400.00. Thus the payback for this component of the hierarchy is 3.0 years at the initially anticipated rate of diversion, not including compost sales.
- **Compost Market.** Quality compost will be produced which we anticipate will have a market value of \$20 to \$40 per ton (\$8 to \$20 per cubic yard), or about \$50,000.00 to \$100,000.00 per year. This profit level is sufficient to attract the private sector to continue the project after the grant period.
- **Co-Collection Efficiencies.** Current systems require farmers to make "milk-run" collections at multiple locations. By aggregating fresh food for animals, participant farmers will be able to reduce transportation costs.
- **Worms,** Vermi-compost has a retail value of \$100+/ton in some areas of the country. However, these prices have not been paid in Florida. Part of the challenge is developing these compost markets. We are sharing information with the Florida Organic Growers Association (FOG) and will be field testing compost products on FOG member farms in the area. We also plan to send compost samples to The Organic Materials Review Institute (OMRI) to have the project's product certified for use in organic agriculture. These activities are anticipated to increase the value and cost effectiveness of the project.
- **Onsite Composting.** We will compare the cost of a small-scale in-vessel system used at the generator's site to the total cost for centralized processing. We anticipate both savings to the generator and environmental benefits through this model. Current research indicates that the

majority of odor is produced during the first two weeks of composting. Therefore, on-site composting could have a significant impact on odor reduction. Additional potential benefits include: reduction in the weight and volume of materials that need to be managed, increased stability of materials that must be handled, and more cost-effective transportation of residue.

- **Coordination with FORCE.** The project will coordinate with FORCE, to maximize efficiency of project, streamline program implementation, add to the existing body of knowledge on composting, and replicate trials, as appropriate, to demonstrate commercialization of University scale research.
- **Innovative low-tech solutions.** Not all communities will be able to afford large scale in-vessel composting systems. Therefore, this project focuses on low technology solutions to odor suppression and management. We will evaluate the combination of a low capital investment strategy with a low labor strategy by focusing on recipe mixtures that include structure to promote airflow.
- **Sustainability.** Because Sarasota County is popular as a resort and retirement destination, there are numerous restaurants in the County. Six schools, the county courthouse, jail, and hospital are all located within several miles of the site. Overall, it is safe to say that there is a greater supply available to the program of commercial and institutional food residuals than the design capacity. Therefore, the program shall be sustainable beyond the project year, and all partners are committed to continuing the project if proven economically viable.

## **Transferability**

### *Technology & processes.*

The project is highly transferable to other locales throughout the state. All counties generate food discards, and nine to ten have or could benefit from a food bank. Virtually all counties have farms, and locations available for composting. The equipment to be utilized is commercially available, although not currently utilized in Florida.

The project will produce educational materials on preparing food discards for use in a food hierarchy (multi-language). These materials will be immediately available throughout the Publix Supermarkets chain, and will be readily transferable to other grocery chains (significant interest has been indicated by at least one other major chain, although a letter of commitment was not received in time for inclusion in this grant application).

*Infrastructure Development.* The Team notes that the collection infrastructure that this project will develop can be duplicated and used as a model and/or expansion point for developing a feed manufacturing system in Sarasota County, or other counties in the future.

Project results, including recipe information, collection structure, and permit information will be compiled in a series of documents that will be readily available, and will be posted on the Internet (see below).

### *Promotion of transferability.*

The Project Team will add pages to Florida's Online Composting Center ([www.compostinfo.com](http://www.compostinfo.com)) to disseminate information on the project. We will include sections to include the following:

- Discussion of the Food Discards Hierarchy program and guidance on setting up a program based on this project's experience.
- Food for People. Listing resources for food banks and people seeking to support food banks.
- Food for Animals. Discussing health and other issues, markets, processes, new technology, and opportunities to expand programs.
- Food for Plants – composting. Specific guidance on commercial food discards composting, permitting requirements, setting up collection routes, operational issues, and equipment specifications based on our project's experience. Discussion of small-scale in-vessel systems use for onsite management vs. centralized facilities.
- Food for Plants – vermi-composting. Specific guidance on commercial food discards vermi-composting, permitting requirements, options for collecting material, operational issues, and equipment specifications based on our project's experience.

The Project Team will also promote the program through the following methods:

- Work with Recycle Florida Today - FORA division to disseminate information to the Florida organics recycling industry.
- Author at least two articles on the project and seek publication in state and national forums.
- Seek to present at annual conferences within the recycling industry including: Recycle Florida Today, Solid Waste Association of North America, and/or the National Recycling Coalition.

## Local Support

The Project Team has assembled interest and commitments from generators, haulers, processors, and end markets, and has leveraged in kind contributions of \$488,700, of \$1,025,520 total budget, a 48% match. The Project Team is actively seeking additional donations valued at \$30,000 to \$50,000, but which is not reflected in the project budget. An additional contribution of \$50,000 would result in a 52% match. The project intends to make cost effective use of resources by leveraging the local expertise and donations.

### Project Partners, and Explanation of Local Matching Funds.

**Sarasota County.** The County has committed \$20,000 to assist with facilitation, development, implementation, and promotion of the project (\$ 10,000 for each year of the project). These funds are distributed among several in-kind match categories, and generally includes staff time, reproduction/printing costs, postage, and miscellaneous expenses. The county will also donate ground urban plant debris, valued at approximately \$93,000 (200 cubic yards per week @ \$9.00 per yard delivered). *Ownership of any equipment purchased through this grant will comply with Florida Statutes guidelines on the use of grant funding.*

**All Faiths Food Bank (AFFB).** The project will fund a refrigerated truck for AFFB to support the food-for-people. AFFB will implement the food discards hierarchy program with expert sub-contractors and maintain the food-for-people program for a minimum of five years. AFFB will be contributing approximately \$85,000 in-kind support, for annual operational and maintenance costs on the truck, hiring a dedicated driver, and staff support time (two years).

**Publix Supermarkets (Publix).** Publix will be taking a lead both on developing educational materials, and in developing the food-for-animals program, utilizing an existing network of supporters. Publix will be contributing staff time valued at approximately \$9,500, and purchase of specialized containers for the project (value undetermined).

**Byron and Lou Crofut.** The Crofuts will be taking a lead in the food-for-plants program. Their contributions to the project include donating land for siting the operation valued at \$2,500 per month (\$30,000 for one year operation, note that land in the area is selling for \$100,000 per acre). Equipment valued at \$800,000 (we estimate it would cost us \$80,000 to lease this donated equipment for the project period). As well as personnel time valued at approximately \$15,000.

**Vermitechnology Unlimited.** Vermitechnology Unlimited will be donating staff time for program implementation, training, and marketing (of end product) valued at approximately \$12,700.

**Resource Management Group, Inc (RMG).** RMG will be donating consulting staff time for program implementation, training, and marketing (of end product) valued at approximately \$22,500.

The food-for-plants program will require participants to pay for collection service and collection containers. During the grant period, private investment will match the grant funds on a dollar for dollar basis. After the grant year, the program participants will pay the full cost of collection and processing. This allows our program to offer participants in the first year of operation price incentive to participate while the system is being developed. It also provides us with a year of real cost data on which to base fees after the grant year.

## Budget

Description	Cost	In Kind	Request	Timeline – Work Period in which activities will occur							
				1	2	3	4	5	6	7	8
<b>Food for People program</b>											
Refrigerated Collection Truck	\$ 75,000	\$ 10,000	\$ 65,000	x	x	x	x	x	x	x	x
Outreach to Stores, Educational Materials	9,500	6,000	3,500	x	x		x		x		x
Driver	70,000	70,000	-	x	x	x	x	x	x	x	x
<b>Food for Animals program</b>											
Refrigerated Collection Truck (co-collected w/Food for People)	-	-	-	x	x	x	x	x	x	x	x
Outreach to Farms, Educational Materials	6,500	2,500	4,000		x		x		x		x
Outreach to Stores, Educational Materials	10,500	6,000	4,500		x		x		x		x
<b>Food for Plants (composting) program</b>											
Facility design and Permitting	51,100	9,500	41,600	x	x	x	x				
Operator Training	14,200	9,100	5,100				x	x	x	x	
Design collection route, market generators	12,480	-	12,480			x	x	x	x	x	x
Collection and Tip Fees	187,200	93,600	93,600					x	x	x	x
Collection container rental	23,400	11,700	11,700					x	x	x	x
Education/training of generators	18,100	7,700	10,400				x	x	x	x	x
Composting Pad (fill material)	12,500	-	12,500				x				
Composting Pad (transporting fill)	12,500	2,500	10,000				x				
Composting Pad (site preparation)	15,000	5,000	10,000				x				
Composting Site Misc. Improvements	5,000	2,500	2,500				x	x	x	x	x
Composting Equipment**** (lease)	110,000	80,000	30,000					x	x	x	x
Operator Compensation	15,600	-	15,600					x	x	x	x
In-Vessel System	30,000	-	30,000			x	x	x	x	x	x
Ground Urban Plant Debris	93,600	93,600	-					x	x	x	x
Sampling and analysis	6,400	1,400	5,000						x	x	x
Marketing Product	8,600	7,600	1,000							x	x
Screening	500	500	-							x	x
Lease Land	30,000	30,000	-				x	x	x	x	x
Insurance	4,000	-	4,000				x	x	x	x	x
<b>Food for Plants (Vermi-composting) prog.</b>											
Design, and Permitting	16,500	5,300	11,200	x	x	x	x	x			
Operator Training	10,300	5,200	5,100				x		x		x
Vermi-Composting Equipment	110,500	6,500	104,000				x	x	x	x	x
Operator Compensation	15,600	-	15,600					x	x	x	x
Horse Manure	3,000	3,000	-					x	x	x	x
Marketing Product	8,500	8,500	-							x	x
Worms	15,000	-	15,000					x	x		
<b>Reporting, Dissemination of Information, Administration</b>	24,440	11,000	13,440	x	x	x	x	x	x	x	x
<b>Total</b>	<b>1,025,520</b>	<b>488,700</b>	<b>536,820</b>								

Full Funding is required to fund all components of this project and to fully leverage local support.

**Budget Notes:** Our request has increased by approximately \$7,000, which reflects *increases* of \$1,000 for the food-for-people outreach and \$15,600 for operator for composting, and *decreases* of \$500 for food-for-animals outreach, \$4,000 for vermi-composting equipment, and \$5,000 for worms. Our overall budget increased from the pre-proposal, primarily through identifying additional sources of in-kind contributions through local support, and confirming the value of services to be contributed. The project assumes that permitting will take six months to a year, and will begin tasks earlier if the permitting process goes more quickly. We have already contacted the local FDEP office to begin establishing a working relationship.

**Ford, Kim**

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**From:** Butera, Robert  
**Sent:** Thursday, March 07, 2002 9:40 AM  
**To:** Henricks, Ron  
**Cc:** Joyal, Francine; Clark, Jan Rae; Pelz, Susan; Ford, Kim  
**Subject:** Composting of Food Waste Grant - Sarasota County

We have been approached by Sarasota County as to requirements for permitting for the referenced grant. I have not gone on-line to check if the grant is identified. What can you tell us about this grant and is it available on-line. Thanks, Bob.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 3/6/02 Subject Compost GRANT  
Time 10:15 Permit No. \_\_\_\_\_  
County SARASOTA  
M GARY BENNETT Telephone No. (941) 4862600  
Representing SARASOTA COUNTY  
☐ Phoned Me ☒ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting  
Other Individuals Involved in Conversation/Meeting \_\_\_\_\_

PAUL WINKLER  
Summary of Conversation/Meeting I RETURNED HIS CALL  
GB. SAID COUNTY HAS \$500,000 GRANT FOR FOOD WASTE  
COMPOSTING AND WANT TO KNOW IF A PERMIT IS REQ.  
GB. DESCRIBED THE PROJECT: FOOD WASTE WILL GO TO  
1) FOOD BANK, 2) ANIMAL FEED, OR 3) COMPOSTING  
COMPOSTING PROPOSED AS YET LARGEST FOOD WASTE  
- 2 ACRES NEEDED.  
I ASKED FOR A LETTER PROPOSING WHERE COMPOSTING  
WILL BE LOCATED AND HOW IT WILL MEET 62-709.  
GB. SAID COUNTY WILL REVIEW 62-709 & MAKE A PROPOSAL  
AND SEND IN COPY OF GRANT AND ANY CONDITIONS OF IT.  
GB. SAID PILOT PROJECT WILL BE 3-6 MILES, IF SUCCESSFUL 3 YRS.  
I SAID DEP DISTRICT WILL REVIEW PROPOSAL  
AND WILL RESPOND WITH REQUIREMENTS.

(continue on another  
sheet, if necessary)

Signature [Signature]

Title \_\_\_\_\_

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 3/6/02 Subject Compost GRANT  
Time 10:15 Permit No. \_\_\_\_\_

County SARASOTA  
M GARY BONNET Telephone No. (941) 4862600

Representing SARASOTA COUNTY

☐ Phoned Me ☒ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting \_\_\_\_\_

PAUL WILKINSON  
Summary of Conversation/Meeting I RETURNED HIS CALL

GB. SAID COUNTY HAS \$50,000 GRANT FOR FOOD WASTE

COMPOSTING AND WANT TO KNOW IF A PERMIT IS REQ.

GB. DESCRIBED THE PROJECT: FOOD WASTE WILL GO TO

1) FOOD BANK, 2) ANIMAL FEED, OR 3) COMPOSTING

COMPOSTING PROPOSED AS YET LARGEST FOOD WASTE

- 2 ACRES NEEDED.

I ASKED FOR A LETTER PROPOSING WHERE COMPOSTING

WILL BE LOCATED AND HOW IT WILL MEET 62-709.

GB. SAID COUNTY WILL REVIEW 62-709 & MAKE A PROPOSAL

AND SEND IN COPY OF GRANT AND ANY CONDITIONS OF IT.

GB SAID PILOT PROJECT WILL BE 3-6 MONTHS IF SUCCESSFUL 3 YRS.

I SAID DEP DISTRICT WILL REVIEW PROPOSAL

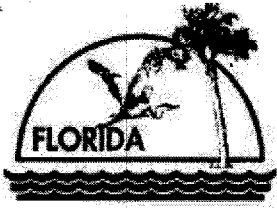
AND WILL RESPOND WITH REQUIREMENTS.

(continue on another  
sheet, if necessary)

Signature [Signature]

Title \_\_\_\_\_





Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

TO: County Recycling Coordinators

FROM: Jennifer Caldwell-Kurka  
Waste Reduction Section, Recycling Program  
Florida Department of Environmental Protection  
2600 Blair Stone Rd. MS 4570  
Tallahassee, FL 32399-2400  
Phone: 850-487-4937 (Suncom 277-4937)

DATE: March 2, 2001

SUBJECT: Year 4 Innovative Grants Awards

This memorandum provides information regarding:

- (1) Final Innovative grant award selections
- (2) Instructions for grantees
- (3) An Updated timeline
- (4) Attachment

## **(1) FINAL GRANT AWARDS**

The DEP Innovative Grants Review Committee has selected the following projects for funding:

<b>Broward-</b> Electronics Recycling in Coordination with a Non-Profit Organization	\$	144,992
<b>Charlotte1-</b> Construction Materials Reuse	\$	316,350
<b>Charlotte2-</b> Electronics Recovery, Reuse, and Recycling	\$	200,000
<b>Dade/Miami-</b> On-Line Interactive Waste Reduction Tool for Businesses	\$	160,000
<b>Duval2-</b> Reuse of Glass as Aggregate for Asphalt Shingles	\$	268,000
<b>Escambia-</b> Regional Electronics Demanufacturing/Recycling & Remanufacturing Project	\$	350,000
<b>Gadsden1-</b> Process Recycled Drywall, Glass & Paper for Use in Manufacturing	\$	280,500
<b>Hillsborough2-</b> Materials Reuse Network	\$	75,000
<b>Leon1-</b> Increased Commercial & Residential Waste Diversion through Innovative Programs & Contracts	\$	380,000
<b>Palm Beach1-</b> Business Equipment Reuse Center	\$	199,574
<b>Palm Beach2-</b> Installation of a Disk Screen System to Process Commercial Fiber	\$	92,000
<b>Palm Beach3-</b> Model Recycling & Waste Reduction Program for County Detention & Correctional Facilities	\$	308,000
<b>Polk-</b> MSW Reduction & Reuse Measurement Guide	\$	228,000

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*Printed on recycled paper.*

<b>Sarasota-</b> Food Recovery & Recycling	\$	536,820
<b>Seminole-</b> Decision Support Tool for Local Source Reduction & Recycling Initiatives	\$	219,500
<b>Sumter-</b> Best Mgmt. Practices Program for Treated & Untreated Lumber	\$	269,000

## **(2) INSTRUCTIONS FOR GRANTEES**

In order to proceed with grant award agreements, I will need the following items and information from all Innovative Grantees **by 5PM on Friday, March 16, 2001**:

- A **detailed scope of services** which aligns the project timeline with deliverables and costs/expenditures. The scope of service must include the project timeline with specific deliverables and associated costs. Project Costs need to be task specific. After the project begins, these costs should coincide with progress reports and reimbursement paperwork.
- A **signed environmental certification form**. This statement verifies that an appropriate environmental expert has carefully reviewed the project and has addressed any environmental safety issues or impacts. The form can be downloaded at:  
[www.dep.state.fl.us/dwm/programs/recycling/igg99/cert.pdf](http://www.dep.state.fl.us/dwm/programs/recycling/igg99/cert.pdf)
- The name of the **official County Project Manager**.
- The name of the **authorized County representative** who will sign all reimbursement requests.
- The **County FEID number and address** where grant payments should be sent.

## **(3) UPDATED GRANTS TIMELINE**

03/16/01 Counties submit scope of services and signed environmental certification form to DEP.

04/20/01 DEP sends Grant agreements to counties for signature execution.

05/29/01 Signed Grant agreement returned to DEP.

***Project reporting periods and reimbursement submittal requirements will be stated in each Grant Agreement.***

## **(4) ATTACHMENT**

- Year 4 Innovative Grant Selections & DEP Project Managers list.

NOTE: The final ranking list and future updates will be posted at:  
[www.dep.state.fl.us/waste/programs/igg01](http://www.dep.state.fl.us/waste/programs/igg01)

- 1) Applicant County: Sarasota County, Florida
- 2) Primary contact person: Jodi John
- 3) Complete Address: Resource Conservation  
Environmental Services  
Sarasota County Government  
1660 Ringling Blvd.  
Sarasota, FL 34236
- 4) Telephone (including SunCom number): 941-364-4663
- 5) E-mail address: jjohn@co.sarasota.fl.us
- 6) Grant Request Amount: \$536,820
- 7) Project Timeframe (months): 24 months
- 8) Project Abstract:

Sarasota County Government seeks funding to develop Florida's first integrated food discard management program using an intrinsic value hierarchy. Significant quantities mean significant opportunities. FDEP estimates 1.3 million tons of food waste was collected in Florida in 1998.

The program will collect food discards generated by supermarkets, restaurants, and institutions (e.g., schools, prisons) and distribute it within the community based on the food's highest and best value.

1. **Food for People:** food that is of highest quality will be collected by a local food bank.
2. **Food for Animals:** food that is of good quality, but not suitable for human consumption will be collected by the food bank in special containers and aggregated for pick up by local farmers.
3. **Food for Plants:** food that is not suitable as food will be collected and processed through composting and vermi-composting into valuable soil amendments.

Each of these program components will function independently, yet complement one another, and form a food discards management pyramid. This powerful diversion strategy, which is unique in Florida, will capture the greatest value in food discards from an environmental, social, and cost-effective standpoint. In addition to food, this project will recover: food soiled paper, yard waste, unmarketable paper (e.g., paper materials recovery facility (MRF) residue), waxed cardboard, and other components of the MSW stream, qualifying this project as addressing "targeted materials."

## **Innovative Technologies and Processes**

Food discards account for 5% to 10% of the overall municipal solid waste stream (exclusive of industrial discards) and offers a huge opportunity for recovery of value from materials otherwise destined for disposal as waste.

### *Not in common use in Florida.*

- **Integrated Hierarchy.** Not one Florida county has implemented a sustainable, integrated food discards management hierarchy.
- **Source Separation.** There are no permitted source-separated food discards composting programs utilizing post-consumer materials currently operating in Florida. Only Sumter county composts any appreciable quantity of food discards, and there the food is mixed with MSW. The product, a mixed-municipal-solid-waste compost, has limited end-market applications.
- **Vermi-composting** is not in common use in Florida on a commercial scale and, up until now, has not been used as a technique for increasing the value of compost. In addition, the vermi-composting system will be constructed of recycled and/or reused materials (minimum 25%).
- **Innovative Carbon Sources.** We will develop procedures for incorporating innovative carbon sources (food-soiled paper, wax cardboard, unmarketable paper) for compost bulking while maintaining quality controls. While attempts have been made to incorporate these challenging materials, this project will combine evaluation of recipe formation with processing method to arrive at sustainable programs that will last beyond the grant period.

### *Novel application of an existing technology or process.*

- **Hierarchy of Diversion.** Hierarchical use of food discards, source reduction (food for people), food reuse (as animal feed); food recycling (including onsite in-vessel composting and vermi-composting). While each of these individual components have been used throughout the ages to manage food discards, our holistic, integrated approach is a novel one.
- **Co-Collection Efficiency.** Some near-expiration foods that are appropriate for animal feed can be co-collected with food for people, while maintaining compliance with FDA and supermarket guidelines for food safety. This novel approach will save farmers time and increase the supply of fresh food for animals.
- **Permit.** The project will seek a solid waste permit to accept and compost food discards and develop guidance for others seeking permits to compost source-separated organic MSW. The permit process is used to protect human health and the environment. The Project Team will work closely with FDEP to share information about successes and challenges in the permit process, and will develop proposals for streamlining this process to stimulate investment in food discards composting, should FDEP choose to do so.

### *Overcoming obstacles to recycling/waste reduction in new or innovative ways.*

- **Compost Markets (Value).** Compost is a historically low priced commodity in Florida. Because of this, many operators minimize investment in composting and sell inferior, typically un-finished materials. These poor products compound market disinterest in compost. We overcome this obstacle by creating a compost that is more beneficial to end-users' horticultural needs.

- ✓ This project utilizes food with urban plant debris, to create a finished product with more nutritional value than yard trash compost.

- ✓ Vermi-composting will be used to “finish” the composting process. Worms have a way of improving the value of compost for plants, and vermi-compost and worm castings command a premium price.
- **Overcoming Collection Challenges.** Two of the major obstacles to food discards management is the limitation on collection infrastructure and failure to integrate collection strategies.
  - ✓ The project also implements an innovative collection system for collecting compostable food discards, focusing on transportation efficiencies.
  - ✓ The project will evaluate composting food discards at the generator’s site (its origin), and transporting partially-composted materials. It is anticipated this will reduce odors, volume, and weight of materials that need to be transported.
- **Programmatic Obstacles.** The Project Team will seek guidance from the Florida Organics Recycling Center of Excellence (FORCE) and other existing resources to build off existing knowledge and to avoid making mistakes demonstrated by previous organics recycling projects. Areas of innovation include demonstration of new composting recipes using food discards and urban plant debris, implementation of original management strategies, and use of non-traditional carbon sources. Innovative demonstrations will include:
  - ✓ Recipes. Source separated food composting has been limited by lack of knowledge about recipe formation. Recipes are the proportional combination of several materials to make a mixture of materials that has the chemical and physical characteristics to promote optimal decomposition by aerobic organisms and to avoid malodorous emissions. The project will develop recipes that incorporate unique materials (e.g. wax cardboard, which has only been co-composted with food waste on a limited basis in Florida). Furthermore, all recipes will be shared through the project’s web site, and in presentations at industry events.
  - ✓ Proper Daily Management The management of food discards through composting and vermi-composting has been attempted many times before. Odor suppression, which will be address by all proposed systems, is the key obstacle to expanded composting. To avoid odor generation, the project will demonstrate specialized aeration equipment (such as innovative turners and a modified passive/active aerated static pile), mobile small-scale in-vessel composting systems, and vermi-composting.
- **Harvesting Worm Castings** is a challenge because you do not want to harvest your worms with your castings, and you do not want to disturb your worms while they are actively working the material. To overcome this challenge, we will lease a specialized castings extractor that allows worm castings to be removed from the system without harvesting worms. It is hoped this will increase operational efficiency. The process also results in increased aeration of the worm beds.
- **Odor Suppression.** Odor has been the primary cause of composting operation failure. The Project Team will build on the successes of the Massachusetts and Vermont food discards composting projects, which have been lauded by the Environmental Protection Agency as model projects that are market based, low technology, and cost-effective.
- **Quality Assurance.** The Project Team will overcome concerns about compost quality by testing finished product for quality, including nutrient analysis, compost maturity, problem metals, and pathogens. The Florida Organic Growers Association (FOG) is interested in participating in the project to help clarify if the project can produce compost from municipally generated organic discards that meets the stringent requirements of this environmentally oriented group.

Both the overall approach and system components apply novel approaches and new technologies to overcome obstacles to effectively manage food discards. The project will provide the most comprehensive and integrated food discard management system ever implemented in Florida.

## **Environmental and Economic Benefits and Cost effectiveness.**

### *Environmental benefits*

Because the project is built on a food management hierarchy, the embodied energy of the food is captured on all levels, and materials can be used in their highest and best use. Embodied energy represents all the environmental and economic inputs required to bring a product into being.

### *Methodology.*

- **Source Reduction.** People do not eat “recycled” food, thus this project is source reduction at its core. Each item that can be diverted to use as food-for-people has the greatest environmental impact, because this food has already been produced to the point of readiness for human consumption. Thus all the production, transportation, and distribution impacts are already embodied in the item. In a holistic sense, providing food for people has a great environmental return, as well, because providing food for people responds to a basic human condition, and fulfills the need for fresh nourishment. The *Food for Animals* program also provides source-reduction.
- **Green House/Global Warming Gas Reductions.** Using EPA guidance, the Project will be among the first in the nation to quantify diversion in terms of preventing/offsetting the production of global warming gasses. The composting component will reduce greenhouse gas production by approximately 800 metric ton carbon equivalents (MTCE) annually, based on the designed capacity of 50-60 tons per week of food discards.
- **Energy Innovation (Pollution Prevention).** The Project Team plans to utilize solar power generation options for operating the in-vessel system. This would enable the mobile in-vessel system to be operated without electrical hook-ups or noise generation. Further, it allows the system to operate without generating greenhouse gas emissions or pollution.

### *Toxicity/Hazards.*

Composting food discards aerobically can result in many environmental toxicity benefits by reducing the chemical reactions that occur as food discards break down in landfills and other waste treatment systems. Composting results in reductions in:

- **Methane generation.** Methane is a flammable gas that must be managed when generated.
- **Leachate generation.** Leachate generated in landfills must be treated and disposed of properly.
- **Odors and Leachate** in solid waste compactors and dumpsters, where health concerns can arise.
- **Vermin/vectors** at waste management facilities, e.g., landfills, due to reduced food attractants.

### *Economic Benefits*

- **Jobs.** Composting facilities employ four times more people on a per-ton basis than landfills (WasteCap Wisconsin). The Sarasota project will create two to three new permanent full-time jobs, will be replicable, and will demonstrate economic feasibility of commercial food discard composting and vermi-composting.
- **Decreased Generator Costs.** The project aims to reduce generator costs by \$20 - \$40 per ton (depending on internal costs to perform source separation).
- **Commercialization of Source-Separated Organics Management.** The project plans a market-based approach to assure on-going success. This includes a tip fee for the compost operator, disposal savings for the generator, and compensation to the hauler. An anticipated tip fee of \$20/ton is \$44/ton below County landfill tip fees. In addition, the proposed facility location is within seven miles of approximately 60% of the County's population.

- **Low Cost Animal Feed.** Two of 16 Publix Stores currently source separate material for farmers. The project will analyze why these arrangements are effective and permitted, and build on this success to encourage other stores (both Publix and other supermarket chains) to support this end-use. The Project Team is mindful of the changing regulations in this component, and has limited the scope and extent of dependence on this sector to utilize food discards.
- ✓ **Food Pelletization.** The concept of pelletization and other value-added preparation will be considered. However, the Project Team is aware that, most currently operating food-to-feed pelletization programs require a minimum of 80 to 150 tons per day to be economically feasible, and multi-million dollar infrastructure development. Such a facility is beyond the scope of this proposal. Currently, the Team is aware of only one jurisdiction considering this technology: Reedy Creek, which is home to Disney World and related Theme Parks. While there is much to learn from Reedy Creek's experiences, the Project Team believes that the collection infrastructure issues facing medium sized counties require further innovation to be cost effective.
- **Building Community Value.** The project will serve the community by partnering with and incubating community entrepreneurs in the manufacture and sale of worms, worm castings, and compost as a value-added soil amendments. Whereas bulk yard waste compost has a retail value of \$0 plus shipping to \$15.00, delivered, per cubic yard, worm castings are sold for up to \$ 2.00 per lb. in small quantities or by bulk at approximately \$35.00 to \$70.00 per cubic yard.

#### *Cost-effectiveness*

- **Food Value.** Diversion of approximately 600,000 lb. of perishable food for people, holds a value of approximately \$1,008,000.00 (per All Faiths Food Bank average grocery food values), and will provide approximately 350,000 to 400,000 meals to area residents in need.
- **Feed Value.** Diversion of approximately 10,000 lb. of perishable food for animals will result in approximately 100 lb. of meat donated to area food banks. Thus the market value of this component alone effectively provides a two-to-three-fold return on investment.
- **Cost Avoidance.** Composting and Vermi-composting will result in annual cost avoidance of approximately \$114,400.00. Thus the payback for this component of the hierarchy is 3.0 years at the initially anticipated rate of diversion, not including compost sales.
- **Compost Market.** Quality compost will be produced which we anticipate will have a market value of \$20 to \$40 per ton (\$8 to \$20 per cubic yard), or about \$50,000.00 to \$100,000.00 per year. This profit level is sufficient to attract the private sector to continue the project after the grant period.
- **Co-Collection Efficiencies.** Current systems require farmers to make "milk-run" collections at multiple locations. By aggregating fresh food for animals, participant farmers will be able to reduce transportation costs.
- **Worms,** Vermi-compost has a retail value of \$100+/ton in some areas of the country. However, these prices have not been paid in Florida. Part of the challenge is developing these compost markets. We are sharing information with the Florida Organic Growers Association (FOG) and will be field testing compost products on FOG member farms in the area. We also plan to send compost samples to The Organic Materials Review Institute (OMRI) to have the project's product certified for use in organic agriculture. These activities are anticipated to increase the value and cost effectiveness of the project.
- **Onsite Composting.** We will compare the cost of a small-scale in-vessel system used at the generator's site to the total cost for centralized processing. We anticipate both savings to the generator and environmental benefits through this model. Current research indicates that the

majority of odor is produced during the first two weeks of composting. Therefore, on-site composting could have a significant impact on odor reduction. Additional potential benefits include: reduction in the weight and volume of materials that need to be managed, increased stability of materials that must be handled, and more cost-effective transportation of residue.

- ***Coordination with FORCE.*** The project will coordinate with FORCE, to maximize efficiency of project, streamline program implementation, add to the existing body of knowledge on composting, and replicate trials, as appropriate, to demonstrate commercialization of University scale research.
- ***Innovative low-tech solutions.*** Not all communities will be able to afford large scale in-vessel composting systems. Therefore, this project focuses on low technology solutions to odor suppression and management. We will evaluate the combination of a low capital investment strategy with a low labor strategy by focusing on recipe mixtures that include structure to promote airflow.
- ***Sustainability.*** Because Sarasota County is popular as a resort and retirement destination, there are numerous restaurants in the County. Six schools, the county courthouse, jail, and hospital are all located within several miles of the site. Overall, it is safe to say that there is a greater supply available to the program of commercial and institutional food residuals than the design capacity. Therefore, the program shall be sustainable beyond the project year, and all partners are committed to continuing the project if proven economically viable.



## **Transferability**

### *Technology & processes.*

The project is highly transferable to other locales throughout the state. All counties generate food discards, and nine to ten have or could benefit from a food bank. Virtually all counties have farms, and locations available for composting. The equipment to be utilized is commercially available, although not currently utilized in Florida.

The project will produce educational materials on preparing food discards for use in a food hierarchy (multi-language). These materials will be immediately available throughout the Publix Supermarkets chain, and will be readily transferable to other grocery chains (significant interest has been indicated by at least one other major chain, although a letter of commitment was not received in time for inclusion in this grant application).

**Infrastructure Development.** The Team notes that the collection infrastructure that this project will develop can be duplicated and used as a model and/or expansion point for developing a feed manufacturing system in Sarasota County, or other counties in the future.

Project results, including recipe information, collection structure, and permit information will be compiled in a series of documents that will be readily available, and will be posted on the Internet (see below).

### *Promotion of transferability.*

The Project Team will add pages to Florida's Online Composting Center ([www.compostinfo.com](http://www.compostinfo.com)) to disseminate information on the project. We will include sections to include the following:

- Discussion of the Food Discards Hierarchy program and guidance on setting up a program based on this project's experience.
- Food for People. Listing resources for food banks and people seeking to support food banks.
- Food for Animals. Discussing health and other issues, markets, processes, new technology, and opportunities to expand programs.
- Food for Plants – composting. Specific guidance on commercial food discards composting, permitting requirements, setting up collection routes, operational issues, and equipment specifications based on our project's experience. Discussion of small-scale in-vessel systems use for onsite management vs. centralized facilities.
- Food for Plants – vermi-composting. Specific guidance on commercial food discards vermi-composting, permitting requirements, options for collecting material, operational issues, and equipment specifications based on our project's experience.

The Project Team will also promote the program through the following methods:

- Work with Recycle Florida Today - FORA division to disseminate information to the Florida organics recycling industry.
- Author at least two articles on the project and seek publication in state and national forums.
- Seek to present at annual conferences within the recycling industry including: Recycle Florida Today, Solid Waste Association of North America, and/or the National Recycling Coalition.

## **Local Support**

The Project Team has assembled interest and commitments from generators, haulers, processors, and end markets, and has leveraged in kind contributions of \$488,700, of \$1,025,520 total budget, a 48% match. The Project Team is actively seeking additional donations valued at \$30,000 to \$50,000, but which is not reflected in the project budget. An additional contribution of \$50,000 would result in a 52% match. The project intends to make cost effective use of resources by leveraging the local expertise and donations.

### **Project Partners, and Explanation of Local Matching Funds.**

**Sarasota County.** The County has committed \$20,000 to assist with facilitation, development, implementation, and promotion of the project (\$ 10,000 for each year of the project). These funds are distributed among several in-kind match categories, and generally includes staff time, reproduction/printing costs, postage, and miscellaneous expenses. The county will also donate ground urban plant debris, valued at approximately \$93,000 (200 cubic yards per week @ \$9.00 per yard delivered). *Ownership of any equipment purchased through this grant will comply with Florida Statutes guidelines on the use of grant funding.*

**All Faiths Food Bank (AFFB).** The project will fund a refrigerated truck for AFFB to support the food-for-people. AFFB will implement the food discards hierarchy program with expert sub-contractors and maintain the food-for-people program for a minimum of five years. AFFB will be contributing approximately \$85,000 in-kind support, for annual operational and maintenance costs on the truck, hiring a dedicated driver, and staff support time (two years).

**Publix Supermarkets (Publix).** Publix will be taking a lead both on developing educational materials, and in developing the food-for-animals program, utilizing an existing network of supporters. Publix will be contributing staff time valued at approximately \$9,500, and purchase of specialized containers for the project (value undetermined).

**Byron and Lou Crofut.** The Crofuts will be taking a lead in the food-for-plants program. Their contributions to the project include donating land for siting the operation valued at \$2,500 per month (\$30,000 for one year operation, note that land in the area is selling for \$100,000 per acre). Equipment valued at \$800,000 (we estimate it would cost us \$80,000 to lease this donated equipment for the project period). As well as personnel time valued at approximately \$15,000.

**Vermitechnology Unlimited.** Vermitechnology Unlimited will be donating staff time for program implementation, training, and marketing (of end product) valued at approximately \$12,700.

**Resource Management Group, Inc (RMG).** RMG will be donating consulting staff time for program implementation, training, and marketing (of end product) valued at approximately \$22,500.

The food-for-plants program will require participants to pay for collection service and collection containers. During the grant period, private investment will match the grant funds on a dollar for dollar basis. After the grant year, the program participants will pay the full cost of collection and processing. This allows our program to offer participants in the first year of operation price incentive to participate while the system is being developed. It also provides us with a year of real cost data on which to base fees after the grant year.

## Budget

Description	Cost	In Kind	Request	Timeline – Work Period in which activities will occur							
				1	2	3	4	5	6	7	8
<b>Food for People program</b>											
Refridgerated Collection Truck	\$ 75,000	\$ 10,000	\$ 65,000	x	x	x	x	x	x	x	x
Outreach to Stores, Educational Materials	9,500	6,000	3,500	x	x		x		x		x
Driver	70,000	70,000	-	x	x	x	x	x	x	x	x
<b>Food for Animals program</b>											
Refridgerated Collection Truck (co-collected w/Food for People)	-	-	-	x	x	x	x	x	x	x	x
Outreach to Farms, Educational Materials	6,500	2,500	4,000		x		x		x		x
Outreach to Stores, Educational Materials	10,500	6,000	4,500		x		x		x		x
<b>Food for Plants (composting) program</b>											
Facility design and Permitting	51,100	9,500	41,600	x	x	x	x				
Operator Training	14,200	9,100	5,100				x	x	x	x	
Design collection route, market generators	12,480	-	12,480			x	x	x	x	x	x
Collection and Tip Fees	187,200	93,600	93,600					x	x	x	x
Collection container rental	23,400	11,700	11,700					x	x	x	x
Education/training of generators	18,100	7,700	10,400				x	x	x	x	x
Composting Pad (fill material)	12,500	-	12,500				x				
Composting Pad (transporting fill)	12,500	2,500	10,000				x				
Composting Pad (site preparation)	15,000	5,000	10,000				x				
Composting Site Misc. Improvements	5,000	2,500	2,500				x	x	x	x	x
Composting Equipment**** (lease)	110,000	80,000	30,000					x	x	x	x
Operator Compensation	15,600	-	15,600					x	x	x	x
In-Vessel System	30,000	-	30,000			x	x	x	x	x	x
Ground Urban Plant Debris	93,600	93,600	-					x	x	x	x
Sampling and analysis	6,400	1,400	5,000						x	x	x
Marketing Product	8,600	7,600	1,000							x	x
Screening	500	500	-							x	x
Lease Land	30,000	30,000	-				x	x	x	x	x
Insurance	4,000	-	4,000				x	x	x	x	x
<b>Food for Plants (Vermi-composting) prog.</b>											
Design, and Permitting	16,500	5,300	11,200	x	x	x	x	x			
Operator Training	10,300	5,200	5,100				x		x		x
Vermi-Composting Equipment	110,500	6,500	104,000				x	x	x	x	x
Operator Compensation	15,600	-	15,600					x	x	x	x
Horse Manure	3,000	3,000	-					x	x	x	x
Marketing Product	8,500	8,500	-							x	x
Worms	15,000	-	15,000					x	x		
<b>Reporting, Dissemination of Information, Administration</b>	24,440	11,000	13,440	x	x	x	x	x	x	x	x
<b>Total</b>	<b>1,025,520</b>	<b>488,700</b>	<b>536,820</b>								

Full Funding is required to fund all components of this project and to fully leverage local support.

**Budget Notes:** Our request has increased by approximately \$7,000, which reflects *increases* of \$1,000 for the food-for-people outreach and \$15,600 for operator for composting, and *decreases* of \$500 for food-for-animals outreach, \$4,000 for vermi-composting equipment, and \$5,000 for worms. Our overall budget increased from the pre-proposal, primarily through identifying additional sources of in-kind contributions through local support, and confirming the value of services to be contributed. The project assumes that permitting will take six months to a year, and will begin tasks earlier if the permitting process goes more quickly. We have already contacted the local FDEP office to begin establishing a working relationship.

BoB HB  
SP

SKULON'T  
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHWEST DISTRICT

NEEDING A PERMIT?  
See E-mail.

CONVERSATION RECORD

Date 3/6/02 Subject Compost GRANT  
Time 10:15 Permit No. \_\_\_\_\_  
County SARASOTA  
M GARY BENNETT Telephone No. (941) 4862600  
Representing SARASOTA COUNTY  
☐ Phoned Me ☒ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting PAUL WINKLER

Summary of Conversation/Meeting I RETURNED HIS CALL  
GB. SAID COUNTY HAS \$500,000 GRANT FOR FOOD WASTE  
COMPOSTING AND WANT TO KNOW IF A PERMIT IS REQ.  
GB. DESCRIBED THE PROJECT: FOOD WASTE WILL GO TO  
1) FOOD BANK, 2) ANIMAL FEED, OR 3) COMPOSTING  
COMPOSTING PROPOSED AS Y/T LAYERED FOOD WASTE  
- 2 ACRES NEEDED.  
I ASKED FOR A LETTER PROPOSING WHERE COMPOSTING  
WILL BE LOCATED AND HOW IT WILL MEET 62-709.  
GB. SAID COUNTY WILL REVIEW 62-709, MAKE A PROPOSAL,  
AND SEND IN COPY OF GRANT AND ANY CONDITIONS OF IT.  
GB. SAID PILOT PROJECT WILL BE 3-6 mos, IF SUCCESSFUL 3 yrs.  
I SAID DEP DISTRICT WILL REVIEW PROPOSAL  
AND WILL RESPOND WITH REQUIREMENTS.

(continue on another  
sheet, if necessary)

Signature [Signature]  
Title \_\_\_\_\_

**SPECIFIC CONDITIONS:**

- d. The permittee shall not accept hazardous waste or any hazardous substance at this site. Hazardous waste is a waste in Chapter 62-730, F.A.C. Hazardous substances are those defined in Section 403.703, Florida Statute or in any other applicable state or federal law or administrative rule.
10. **Waste Handling Requirements.**
- a. The composting facility shall be operated so as to handle solid wastes on first-in, first-out basis.
- b. Food waste shall be processed **daily** on operating days or removed for off-site disposal **within 24 hours** of receipt at the composting facility.
- c. Material which has completed the composting process shall be removed from the site within three months.
- d. In the event that the storage capacity has been reached, no additional material shall be accepted at the facility until sufficient storage and/or processing capacity has been restored.
11. **Material Storage Requirements.**
- a. The storage capacity of this facility is limited to 580 cubic yards total of in-process material, finished compost, or a combination thereof (i.e. 4-Ag Bags rows). The compost windrows shall be formed and managed in accordance with the layout shown on the Yard Plan (attached).
- b. Storage of yard trash mulch and unprocessed food wastes is limited to the "receiving pad" as shown on the Yard Plan.
- c. Yard trash mulch which will not be made into compost or processed into other usable material shall be removed at least **monthly**.
- d. All solid waste (yard trash mulch, food waste, or compost) received, processed or stored at the composting facility shall be stored, processed and managed in a manner so as not to constitute a fire or safety hazard or a sanitary nuisance. Likewise, these materials shall be stored, processed and managed such that odors and vectors are minimized.
- e. Plastic bags and solid waste other than the authorized materials for the facility, shall be separated and stored in a manner that prevents odor and vector problems and shall be removed **within 24 hours** of receipt. If odors are determined to be a nuisance at the site boundaries, or if rainfall damages the final curing piles, odor controls or waterproof covers may be required.



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

## PERMITTEE

Sarasota County  
Solid Waste Operations  
c/o Mr. Gary Bennett  
4000 Knights Trail Road  
Nokomis, FL 34275

## PERMIT/CERTIFICATION

WACS Facility ID No: SWD/58/51614  
Permit No: 200819-001-SO  
Date of Issue: **04/15/2003**  
Expiration Date: **04/15/2004**  
County: Sarasota  
Lat/Long: 27° 12' 09"N  
82° 23' 15"W  
Sec/Town/Rge: 1-4, 9-16/38S/19E  
Project: Food Composting  
Facility Operation - CCSWDC

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-522, 62-550, 62-701, and 62-709. 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 composting facility (approximately 1/2 acres), referred to as the Food Composting Facility, subject to the specific and general conditions attached, located on the existing CCSWDC landfill at the north end of Knights Trail Road, northeast of Venice, Sarasota County, Florida. The specific conditions attached are for the operation of a:

1. Food Composting Facility

**Replaces Permit No.: N/A, new**

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.