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Governor

# Department of Environmental Protection

SW-Sumter  
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MAY 23 2005

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

File: Sumter County

Solid Waste Section  
# 53008

Co. SW Facility Compost Operation

Colleen M. Castille  
Secretary

740 Compost

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

May 19, 2005

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

Dear Mr. Dew:

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

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

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

#### GENERAL:

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

"More Protection, Less Process"

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

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

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

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

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

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

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

(Comment #3 cont.)

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

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

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

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

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

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

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

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

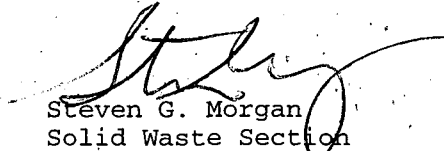
5. **Rule 62-701.320(5)(b), F.A.C. BAT 502 Test Applications:** Please provide supporting information, documentation and engineering calculations that demonstrate that the proposed odor control system will provide the application rate and contact residence time for the BAT 502 solution described by this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

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

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

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

Sincerely,



Steven G. Morgan  
Solid Waste Section  
Southwest District

SM/sgm

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