



CHARLES A. HUNSICKER
Assistant Director

MANATEE COUNTY PUBLIC WORKS DEPARTMENT

(813) 792-8811
FL "SUNCOM" 527-1330
FAX: 795-3490

4410 66th Street West
P.O. Box 25010
Bradenton, Florida 34206



PATRICK A. KENNEDY

Director Solid Waste Management

Telephone (407) 422-4911

Fax (407) 648-8382

Olympia Place, Suite 300
800 North Magnolia Avenue
Orlando, Florida 32803-3261 USA

R.W. BECK
AND ASSOCIATES



GUS A. DiFONZO
Solid Waste Division Manager

MANATEE COUNTY GOVERNMENT

(813) 792-8811 Ext. 5428
FAX (813) 795-3490

4503 66th Street West
Caller Service 25010
Bradenton, Florida 34210

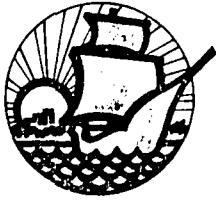
Printed On 10% Post/50% Pre Consumer Wastepaper

JEFFREY N. STEINSNYDER

**ASSISTANT COUNTY ATTORNEY
MANATEE COUNTY**

**P.O. Box 1000
BRADENTON, FLORIDA 34206**

**TELEPHONE
(813) 745-3750**



MANATEE COUNTY

BOARD OF COUNTY COMMISSIONERS

HAND DELIVERED

June 28, 1992

Mr. John M. Ruddell, Director
Division of Waste Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: Supplemental Information for Manatee County's Petition for
a Variance from the January 1, 1992, Yard Trash Ban from
Class I Landfills**

Dear Mr. Ruddell:

The information included in this letter and the reports submitted herewith are intended to clarify the County's position and what we believe to be sound reasons for granting the variance, which have not been accepted by the Department of Environmental Regulation. Manatee County's attorneys have filed a Motion for Reconsideration and we are meeting with the Department on June 29 to present this additional information.

As indicated in our Application for the Variance dated December 10, 1991, the County is in the process of selecting a vendor that will enable the County to comply with all requirements of the Solid Waste Management Act, including the yard waste ban. The County's long-range Solid Waste Master Plan is based on the facilities to be constructed by this vendor as the primary technology for compliance. Our solid waste planning consultant, R. W. Beck and Associates, documents the progress of this effort and the projected date this facility will be available in their report. They also show the costly implications of selecting a short-term approach that only addresses the yard waste requirements.

In his accompanying report, Mr. Gus DiFonzo, our Solid Waste Division Manager, shows that Manatee County has a history of compliance with the dates and requirements of the Solid Waste Management Act. The County has partially complied with the requirement to divert yard waste insofar as it would not conflict with our long-term overall strategy and require separate yard waste collection.

In addition to the information presented in these two reports, Manatee County respectfully requests that you consider the current economic conditions in the County and the hardship that adding costly new services at this time will place on our residents.

As you know, the United States has been in a serious recession and neither Florida nor Manatee County has been spared. Our economy has been hard hit in terms of unemployment, business closings, and reductions in labor force. The construction industry and tourism are important parts of our economy which have experienced a significant decline in the past several years.

The following statistics and economic indicators give some sense of how serious the situation is in Manatee County:

Unemployment

- In March, 1992, 7,425 people were unemployed in Manatee County, the largest number in our history. Further, the February, 1992, unemployment rate was the highest since April, 1983.

Business Closings/Reductions

- In the past 18 months the following businesses have either gone out of business or had serious reductions in labor force:

Wellcraft Marine - Reduction of 1,000 jobs
Tropicana Products - Reduction of 200 jobs
Donzi Marine - Merged with Chris-Craft, loss
of 450 jobs
Piney Point Phosphates, Inc. - Plant closed,
loss of 171 jobs
As well as other smaller business closings

Construction

- Residential building permits show a reduction of 33.2 percent in new permitted units. Because of this drop in construction, permit fees and charges are off over \$300,000 and threaten the loss of positions in the County's Building Department.
- Over the past 12 months, the construction industry has lost 200 jobs.

Tourism

- Tourism is down 5 percent or 40,000 visitors from last year. This is equivalent to a loss of \$15,610,000 in taxable sales.
- Passenger traffic at the Sarasota/Bradenton Airport is down 16.6 percent from 1991 and 19 percent from 1990 indicating a downturn in tourism and less business travel.

General

- New car/truck sales, the greatest contributor to taxable sales, are down 7.5 percent from 1991 and 26.2 percent from 1990 over 1,000 units.
- Appraised property valuation is virtually flattened out for the first time in 10 years.
- Over the past 12 months, Wholesale and Retail Trade lost 100 jobs and Finance, Insurance, and Real Estate lost 200 jobs.
- Manatee County business parks have an 18.2 percent vacancy rate (509,450 square feet). There are also 433,300 square feet of retail space and 148,650 square feet of office space empty.

The Acting County Administrator has recently informed all employees that cost cutting measures will be instituted to keep from laying off employees. Some of these measures include: no requests for new equipment will be made for the next fiscal year; only those vacant, essential positions will be filled during the remainder of this fiscal year; and, a one year moratorium on in-lieu vacation payments. The Board of County Commissioners is considering reducing all employees' hours by two hours per employee weekly and closing County Departments/offices one or two days without pay during the year. In addition, no merit increases have been given to any County employee during the present fiscal year or are anticipated for the next fiscal year.


The Board of County Commissioners has taken the position that in order to stimulate the local economy, it would privatize many of the Public Works construction projects which had previously been done in-house by the Public Works Department. This action was a recognition by the Board of the hardship that was currently being

faced by local contractors and their desire to help out this local industry; however, this action resulted in the elimination of a number of Public Works vacant positions during reorganization last fall.

While we realize that the amount of money to be spent on separate yard waste collection (which our consultant estimates at \$1.7 million) will not by itself rescue the County's economy, we believe that it is our responsibility to do what we can to hold the line on costs and to provide all our public works services as economically as possible. The amount of money is significant and this expenditure can be avoided without substantially reducing the life span of the existing landfill by taking the approach Manatee County proposes.

We ask you to consider (i) possible economic hardship to the County, (ii) our past compliance record, our proven commitment to sound solid waste management planning and (iii) our intention to comply with the yard waste ban in a timely manner while partially complying in the interim. Based on these considerations, we request that the Department grant the variance for a time period adequate to complete the process in progress. In no event is Manatee County requesting a variance for longer than twenty-four months, at this time. The County is willing to agree to periodic progress reports and achievement of specific milestones as a condition for continuing or extending the variance.

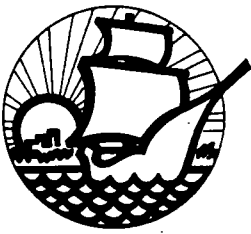
Sincerely,



KATHY SNELL
Chairman

KS:JNS:rm

cc: H. Hamilton Rice, Jr., County Attorney
Richard A. Wilford, Public Works Director
Daniel T. Gray, Deputy Director of Operations
Gus A. DiFonzo, Solid Waste Division Manager



MANATEE COUNTY GOVERNMENT

Public Works Department

RECYCLING/WASTE REDUCTION PROGRAM

JUNE 29, 1992

The purpose of this report is to demonstrate Manatee County (population 215,130) has met the provisions of The Solid Waste Management Act (The Act), F.S. 403.201, Chapter 88-130. Specifically, this report will demonstrate what measures have been taken by Manatee County Government (the County) to address the requirements of the comprehensive legislation of the Solid Waste Management Act, adopted October 1, 1988.

The Act required implementation of a recycling/waste reduction program by October 1, 1989, to address the majority of newspaper, aluminum cans, glass, and plastic bottles. In addition, the Act set prohibitions for disposal in lined landfills of the following items:

PROHIBITED DATE	MATERIAL
July 1, 1989	Construction Debris
January 1, 1989	Lead-Acid Batteries
October 1, 1988	Waste Oil
July 1, 1989	Waste Tires
January 1, 1990	White Goods
January 1, 1992	Yard Waste

Manatee County has met the statutory time frames regarding disposal for construction debris, lead-acid batteries, waste oil, waste tires and white goods.

Manatee County has moved as expeditiously as possible to comply with all of the provisions of the Act. However, a number of factors have caused the County to move cautiously in implementing a comprehensive recycling program.

The County has wanted to meet the spirit, as well as the intent, of the Act. This required a careful study of the options available, including the effectiveness and cost of those options. Further, the potential costs to the County and the citizens of Manatee County were a significant concern to the Board of County Commissioners, particularly in extremely difficult economic times.

Neighboring Sarasota County has received extensive criticism for jumping to an ill conceived, ineffective, and extremely expensive recycling program. Manatee County did not want to make those same mistakes.

In October, 1985, Manatee County initiated mandatory solid waste collection for all residential/commercial entities within its confines (exempting a residential rural area in eastern segments of the County). Mandatory collection was implemented to insure proper solid waste disposal, litter control, and as an aide in prevention of illegal dumping. This program has effectively served the citizens of this County with efficiency, positive environmental results, and little economic impact.

STEPS TAKEN TO MEET THE MATERIALS SEPARATION REQUIREMENTS OF THE ACT:

In January, 1989, the County created a Recycling Office within the Public Works Solid Waste Division consisting of a Recycling Coordinator, Program Specialist, and Field Technician. This newly created office officially opened on May 1, 1989.

In order to proceed in an timely, effective, yet cost efficient manner, staff thoroughly reviewed The Act to determine the spirit, requirements, and intent of the law in order to attain its directives prior to December 31, 1994. A carefully planned three-phase approach was plotted in order to:

- a. Identify and study current market availability.
- b. Evaluate costs of various programs/operations.
- c. Research collection methods and innovative reduction technologies.
- d. Monitor progression of legislation.

Prudently, and with concern for the environment as well as our citizens, staff began implementation of a three phase program.

An aggressive public education and awareness program was instituted to educate our citizens as to the importance of the up-coming programs and continue as part of the total solid waste management program. Tom Armstrong graciously granted the Recycling Office permission to utilize his nationally know comic strip character "Marvin" as the central theme for our promotional efforts. The Recycling Office has responded to over 100 requests for speaking engagements, participated in several community fairs and civic events with a booth, informational speakers, handouts, and facts sheets for Manatee County and Florida as a whole. A public school educational tour of our landfill including verbal/visual aide support has been conducted for all 4th grade students since 1988. The 4-R's educational program has been distributed to all Manatee County Schools.

Plans for Phase I began with requests to each homeowner association, mobile home park, and other cohesive residential neighborhood to participate in the curbside program. Phase I, implemented October 1, 1989, consisted of a voluntary source-separation curbside recycling program for 3,000 households. Three containers were distributed to each household for the collection of newspaper, clear glass, and aluminum at no cost to the participants.

With Phase I in operation, plans began for implementation of Phase II with requests to the communities of a like nature to Phase I.

This Phase utilized a co-mingled container for newspaper, aluminum and clear glass for curbside separation by the collector/hauler, and was implemented for an additional 4,000 households in November, 1990. To compliment the curbside recycling and reach those not served at curbside, drop-off collection centers were sited in eight locations throughout the County. These centers accommodated the collection of newspaper, aluminum, plastic, and clear, green, and brown glass.

As Manatee County has now gathered useful information as to programs that might best serve the environmental and economic needs of its citizens, final planning stages are under way for Phase III - implementation of a county-wide waste reduction program. This program is being tailored to address the majority of not only those required materials but also will include other highly visible materials such as cardboard, tin cans, and styrofoam.

STEPS TAKEN TO MEET THE "SPECIAL WASTE ITEMS" REQUIREMENT OF THE ACT:

Manatee County no longer accepts waste oil at its facility as of October, 1988, and all citizens were originally referred to the State Waste Oil Hot-Line. As time progressed, private enterprise within the county has set up programs for the collection and processing of waste oil. At this time, there are a minimum of twelve sites for the residential collection of waste oil at no cost to the citizens of this County. Waste Oil will also be collected as part of the Household Hazardous Waste Collection Events that will be conducted twice each year.

Commencing with October, 1988, the County has refused all lead-acid batteries for burial at its landfill facility. Those persons requiring disposal were directed to several businesses throughout the County who acted as buy-back centers. For those citizens who requested alternative options, and to reinforce sound environmental recycling methods, lead-acid battery disposal is offered at the landfill's household hazardous waste storage facility as a free service.

Manatee County began segregation and reuse of construction debris received at its landfill facility July 1, 1989.

In addition, a Florida Department of Environmental Regulation permitted site was constructed at the landfill facility for waste tire storage, shredding and reuse. A contract was approved with Geo-Tech, Inc. for the shredding of tires on a quarterly basis. The processed waste tire material is utilized as a mixing agent with dirt for use throughout the landfill.

In January, 1990, the County set in place a program for the segregation of all white goods brought to its landfill facility. White goods are collected on a bi-weekly basis for processing by a scrap metal broker. A requirement of the contract between the County and the broker is special attention to the containment and disposal of all capacitors that could release CFC's or PCB's into the environment.

A contract was executed with Resource Recovery Industries, Inc. in April, 1991, to address processing of yard waste within our County. Implementation of a program for chipping and mulching of all yard waste entering the landfill was initiated. All yard waste entering the landfill facility must be in clean loads and is directed to the mulching area. However, yard waste collected curbside from residential areas as part of the mandatory solid waste collection system is not being separated at this time. Lawn Maintenance and Tree Service companies have been advised that they may not leave debris at their residential/commercial customers site but bring it either to the landfill or a private processing company for disposal. The County is in the process of implementation of a two-fold program for use of its graded mulch produced at the landfill facility. The yard waste recycling/waste reduction program will allow for donation of mulch to non-profit organizations and County agencies. The remainder of mulch produced will be purchased by a private vendor for resale.

A request for an Update to our Solid Waste Master Plan was approved by the Board of County Commissioners, and a contract executed April 2, 1991, with R. W. Beck & Associates, Inc. to initiate work on the several tasks outlined in their Scope of Services (see attached).

In addition, the County has implemented the following waste reduction programs since October 1, 1989:

Christmas Tree Recycling		December, 1989
Office Paper Recycling		April, 1990
Telephone Book Recycling		July, 1990
Household Hazardous Waste Collection		March, 1991
Litter Prevention:		
Adopt-A-Highway*	Adopt-A-Road*	March, 1992*
Adopt-A-Shore*	Operation Facelift	August, 1990

*In conjunction with Keep Manatee Beautiful, Inc., an affiliate of Keep America Beautiful, Inc.

In support of the County's waste reduction efforts, each of our six municipalities has implemented recycling/waste reduction programs as follows:

CITY	POPULATION	PROGRAM
Anna Maria	1,764	Drop-off sites
Bradenton	44,554	Curbside collection
Bradenton Beach	1,653	Drop-off sites
Holmes Beach	4,868	Drop-off sites
Longboat Key(part)	2,571	Curbside collection
Palmetto	9,274	Drop-off sites

The municipalities also participate in annual County events such as Christmas tree recycling, telephone book recycling, etc.

In conclusion, Manatee County's response to the requirements and prohibitions set forth in Florida Statute 403.201, Chapter 88-130, has been timely and effective in waste reduction entering the landfill. The County has been able to meet the statutory requirements in the following areas:

- Construction Debris
- Waste Oil
- White Goods
- Lead-Acid Batteries
- Waste Tires
- Yard Waste - partial compliance

The County has carefully monitored all landfilled and recycled tonnage materials within the geographical confines of our County. Annual reports to the Florida Department of Environmental Regulation have been submitted beginning with Fiscal Year 1989. The following indicates progress made thus far in our County:

FISCAL YEAR 1989	REDUCTION RATE
1989	3 %
1990	11 %
1991	21 %

The County has adopted a successful format for implementation of a county-wide total waste reduction program that has been developed under a concept that is environmentally conscious and economically sound. This prudent approach has brought Manatee County to the 12th most responsive County in the State (see Recycling Performance Chart attached) issued by the Florida Department of Environmental Regulation for each fiscal year.

TABLE B.1
MANATEE COUNTY, FLORIDA
Update of Solid Waste Master Plan
Proposed Tasks/Subtasks

TASK	DESCRIPTION
1	Describe the Study Area
1.1	Research demography
1.2	Review planning documents/maps
1.3	Write report section
2	Determine Waste Quantities and Characteristics
2.1	Review waste composition studies
2.2	Identify and survey major generators
2.3	Project solid waste quantities/composition
3	Evaluate Waste Acquisition/Flow Control Techniques
3.1	Review existing solid waste and recycling collection systems
3.2	Review regulations, ordinances and agreements
3.3	Propose improvements
4	Evaluate Existing Facilities and Operations
4.1	Visit, inventory and appraise facilities
4.2	Analyze landfill site capacity/project life
4.3	Determine cover material availability
4.4	Assess site expansion/additional facilities
4.5	Review compliance history
4.6	Recommend capital improvements
4.7	Suggest revised operational procedures
5	Update Energy and Fuel Markets
5.1	Review existing market surveys
5.2	Survey energy and RDF markets
5.3	Survey landfill gas markets
5.4	Project costs of facilities
6	Estimate Recoverable Materials and Survey Markets
6.1	Analyze existing source separation programs
6.2	Evaluate waste processing facility (MRF)
6.3	Survey markets for various grades of materials

TABLE B.1 (CONTINUED)
 MANATEE COUNTY, FLORIDA
 Update of Solid Waste Master Plan
 Proposed Tasks/Subtasks

TASK	DESCRIPTION
7	Evaluate Alternative Solid Waste Processing/Disposal/Waste Reduction System Proposals
7.1	Identify processing/disposal technologies for consideration
7.2	Identify waste diversion/materials recovery options
7.3	Combine technologies/develop system concepts
7.4	Formulate criteria for comparison
7.5	Compare costs considering risk
7.6	Compare and rank alternatives
7.7	Recommend preferred programs/systems/facilities
7.8	Review/recommend future sitings
7.9	Estimate costs of siting
8	Identify Permitting Requirements
8.1	Review regulations
8.2	List required permits
8.3	Develop timelines and permitting costs
9	Evaluate Ownership, Management and Financing Options/Assist with Procurement
9.1	Assist with procurement
9.2	Evaluate financing options
9.3	Evaluate ownership/management options
10	Plan Budgets/Solid Waste Rate Structures
10.1	Review existing rate structure/rates
10.2	Develop implementation structure
10.3	Develop landfill operations budget forecast
10.4	Develop recycling operations budget forecast
10.5	Project revenue requirements and rates
11	Review Comprehensive Plan
11.1	Review existing plan
11.2	Review ordinances and franchises
11.3	Suggest modifications
11.4	Modify/rewrite solid waste management element

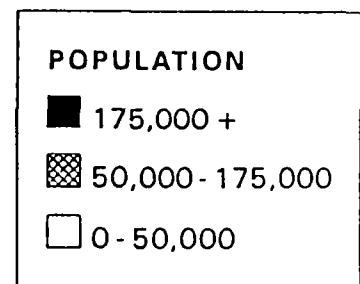
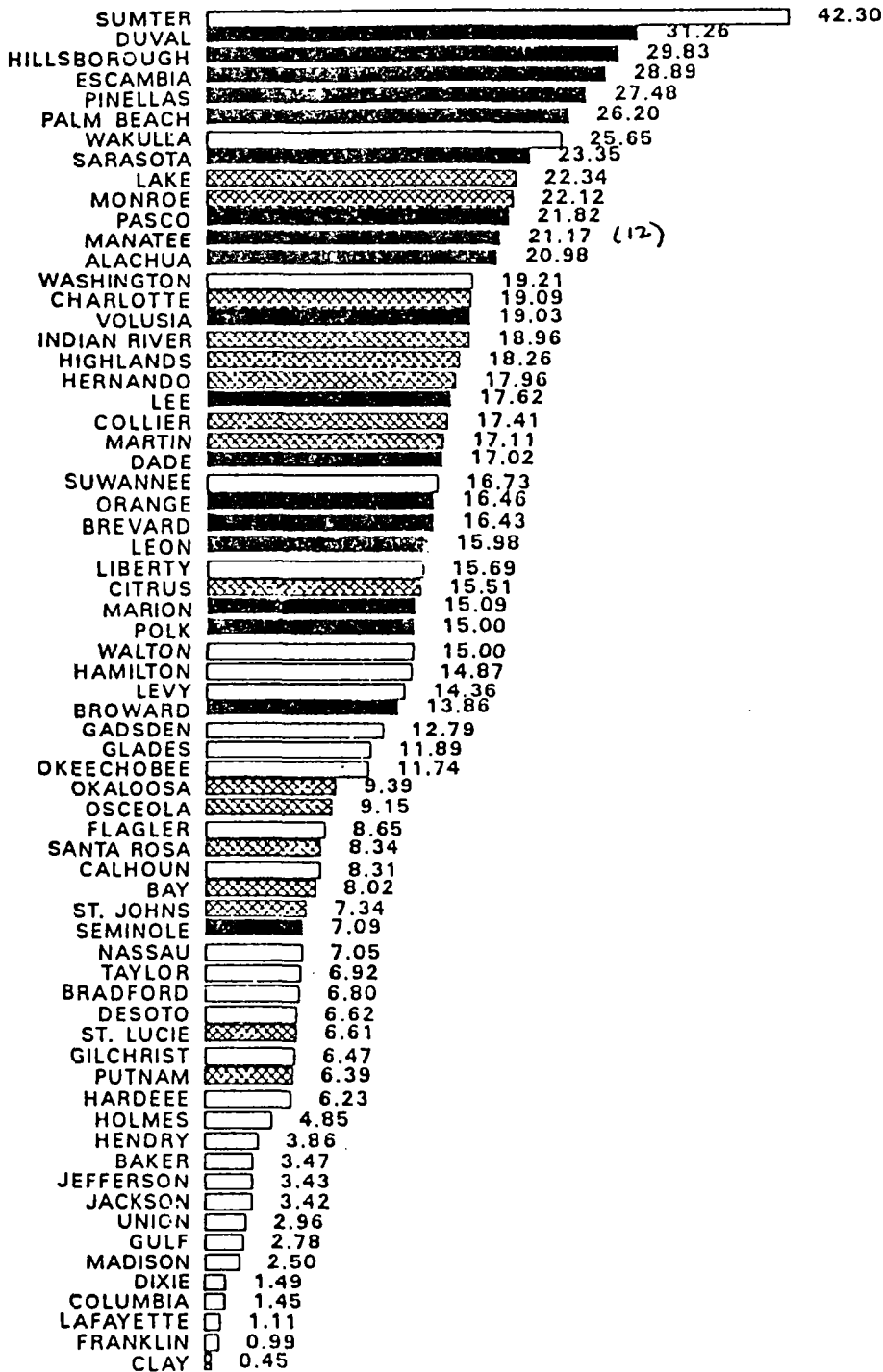
TABLE B.1 (CONTINUED)
MANATEE COUNTY, FLORIDA
Update of Solid Waste Master Plan
Proposed Tasks/Subtasks

TASK	DESCRIPTION
12	Prepare Final Summary Report and Present Detailed Recommendation
12.1	Write draft report
12.2	Respond to comments
12.3	Write final report
12.4	Present final report/recommendation

COUNTY ADJUSTED RECYCLING RATES (PERCENT)

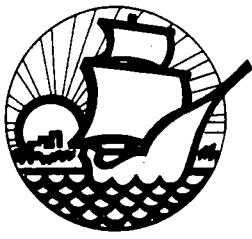
BY DECREASING ADJUSTED RECYCLING RATES

(JULY 1, 1990 - JUNE 30, 1991)



SOURCE: FDER (1991 RECYCLING AND EDUCATION GRANT APPLICATIONS)

3/13/92



MANATEE COUNTY GOVERNMENT

Public Works Department

YARD WASTE REDUCTION PROGRAM

JUNE 29, 1992

Prior to the Solid Waste Management Act (The Act), Manatee County (the County) operated a Florida Department of Environmental Regulation permitted air curtain incinerator at its landfill facility for disposal of clean wood and yard debris. In response to the requirements and intent of The Act, the County executed a contract and implemented a mulching program with Resource Recovery Industries on April 2, 1991. Due to Manatee County's desire to utilize those systems that are environmentally friendly, the air curtain incinerator has been dismantled.

The initial program was for a basic grinding of the mulch for use within the confines of the landfill facility as a cover mixing agent and bank erosion.

As we progressed, this program has been expanded to allow for more effective usage of the material received. Currently, Resource Recovery Industries is operating a full-scale, Grade A mulching program at the landfill facility.

All commercial yard waste is received in clean loads. The commercial yard waste is directed to the "mulching area" for processing by employees stationed at the landfill on a full-time basis by Resource Recovery Industries. At that site, commercial yard debris is separated and graded accordingly. This debris is then ground and processed to create two variables of mulch. Manatee County is processing approximately 18,600 tons of yard debris per year with its current mulching program.

This operation has been fine tuned, and County staff is in the process of a two-fold plan for an environmentally effective, cost-efficient program of mulch utilization. Staff is preparing a request to the Board of County Commissioners for approval to donate mulch to interested non-profit organizations and County departments. Approval of this program will allow for effective use of a good product and assist in beautification projects throughout Manatee County. In addition to the obvious aide to beautification projects is the spin-off benefit of public awareness regarding reuse of products and the need for litter prevention.

The Agriculture Department for Manatee County provides several educational tools for the general public that emphasizes the need for sound management of our natural resources. Widely publicized and included in the agricultural information for our citizens is encouragement of the use of mulching equipment for processing of tree products. In particular, this agency recommends that grass clippings not be removed after cutting but left on the ground as a natural method of fertilization. Utilization of

ADMINISTRATION • 4501 - 66th Street West, Bradenton, Florida 34210 • (813) 792-8811 • FAX (813) 795-3490

this lawn maintenance practice encourages an environmentally sound method of eliminating unnecessary chemical use as well as provides a waste reduction benefit to our landfill facility.

The second part of the plan provides for sale of the product to a private vendor for resale throughout the community. A Request for Bid is currently being reviewed by staff prior to submittal to our Purchasing Department for selection of a qualified vendor. In part, the contract for purchase will require removal of mulch produced at the landfill facility on a weekly basis. This segment of the total mulching program will insure adequate working space at the landfill, disposal of mulch outside the confines of the landfill in an approved manner, and provide revenue to the County to aide in off-setting the cost of the mulching operations. Currently, Manatee County's expenditure for mulching of yard waste received at the landfill exceeds \$38,000 per month. This expenditure covers only the invoices submitted to the County by our contracted vendor and is based on cost per ton processed. Additional costs incurred through use of landfill equipment, personnel and space needs have not been calculated at this time.

Manatee County's goal is to achieve 100% compliance with the yard waste disposal requirement of the Solid Waste Management Act. Curbside collection does not appear to achieve this level of compliance. Upon definition of our county-wide waste reduction program, yard waste will be collected at the site of generation from all of those households and commercial entities wishing to dispose of their debris outside of personal or private composting projects.

In conclusion, Manatee County has addressed its yard waste disposal in a manner that is based on the most environmentally effective use of the material at this time, the economic condition of the County, the provisions within our contracts for the mandatory collection of solid waste, and meets the intent of the Solid Waste Management Act.