



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

CENTRAL DISTRICT
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SECRETARY

April 24, 2015

Jim Christiansen
Environmental Protection Manager
Waste Management Inc. of Florida
7382 Talona Drive
West Melbourne, FL 32904
jchristi@wm.com

Re: Required Use of Certified Laboratory for Compost Analyses
Vista Landfill, LLC
WACS Facility ID No. 87081
Orange County
SPCD-WASP-15-4044

Dear Mr. Christiansen:

This letter is in response to your 1/29/2015 email that requested Waste Management Inc (WMI) be allowed to use A&L Great Lakes Laboratories, Inc., in Fort Wayne, Indiana, for compost analyses of samples from WMI's Vista Landfill, LLC facility. In that email, you referenced your 2/20/2014 email addressed to the Department's Southeast District, wherein you requested use of that same laboratory for compost analyses at WMI's Okeechobee Landfill Organics Processing and Recycling Facility (aka Berman Road Landfill, Solid Waste Facility ID #70436). You acknowledged that the laboratory was not certified under the Florida Department of Health, Environmental Laboratory Certification Program (DOH ELCP).

On 2/24/2014, the Department's Southeast District authorized WMI's use of A&L Great Lakes Laboratories, Inc., for compost analyses of samples from WMI's Okeechobee Landfill facility. At that time, the laboratory was accredited for analyses of solids and chemicals under the National Environmental Laboratory Accreditation Program (NELAP). Sometime after the Southeast District gave you authorization, A&L Great Lakes Laboratory's NELAP accreditation became inactive. Presently, the laboratory does not hold any accreditations or certifications under NELAP or DOH ELCP for any matrices, methods, or analytes.

On 2/11/2015, Central District allowed WMI to continue using of A&L Great Lakes only for testing required by WMI's composting permit at Vista Landfill. That permission was considered to be temporary until the Department determined whether we should allow use of a laboratory not accredited by DOH ELCP for compost. Based on recent internal Department discussions, it is not appropriate to allow the use a non-accredited laboratory for compost analysis.

Rule 62-160.300(1), Florida Administrative Code (F.A.C.), requires that “all laboratories generating environmental data for submission to the Department or for use in Department-regulated or Department-sponsored activities shall hold certification from the Florida Department of Health, Environmental Laboratory Certification Program (DOH ELCP).” As such, you must immediately begin using only laboratories certified under DOH ELCP. You may search for certified laboratories using this hyperlink: [Certified Organizations](#)

Your last compost sampling date at Vista Landfill was 2/3/2015. To comply with Rule 62-709.530(1)(e), F.A.C., you must have your next compost composite sample analyzed for that facility on or about 5/3/2015 or after 20,000 tons of compost have been produced since the last sampling event, whichever comes first. Please let us know if you will be unable to secure use of a certified laboratory by that deadline. If so, we will consider extending the date of analyses accordingly.

Sincerely,



F. Thomas Lubozynski, P.E.
Environmental Administrator
Waste, Air, & Stormwater Programs

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