

INDIAN RIVER COUNTY
COMMUNITY DEVELOPMENT DEPARTMENT
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June 9, 2017

Mr. Tobin R. "Toby" Overdorf
EDC
10250 SW Village Parkway
Suite 201
Port St. Lucie, FL 34987

RE: Sunbreak Farms Proposed Biosolids Management Facility

Dear Mr. Overdorf:

Indian River County staff appreciated the opportunity to meet with you and Mr. Patrick Cheney regarding the proposed \pm 6,600 acre facility located on contiguous acreage within St. Lucie County (5,100 acres) and Indian River County (1,500 acres). At this time, Indian River County staff asks that you confirm the following regarding the proposed 6,600 acre facility.

1. That the facility will be used solely to amend the soil on the 6,600 acre site in support of actively and continuously farming feed corn or a similar crop over the entire subject site except for the Minute Maid Road Reservoir area.
2. That the overall site will continue to be managed for farming under the Florida Department of Agricultural Services (FDACS) best management practices program, including any FDACS best management practices and recommendations for preventing leaching of run-off from biosolids into the soil.
3. That the facility will cease accepting compost or biosolids on site if and when the continuous farming of crops on-site ceases.
4. That mulch from vegetative debris and biosolids will be accepted on-site only twice a year during fallow periods between crops (roughly June – August and November – January).
5. That no mulching will be conducted on site and compost will be tilled into the soil within 90 days of receipt on site; compost will not be stored on site for more than 90 days.
6. That no water or compost will be marketed, sold, or exported from the site.

Note: It was stated in a recent meeting that no water or compost will be exported from the site. That statement is contrary to a portion of the FDEP application (see attachment 2). Will the applicant correct or clarify the application?

7. That the 1,500 acre portion of the site lying within Indian River County drains into the overall system of the 6,600 acre overall site and the 640 acre Minute Maid Road Reservoir that lies within St. Lucie County.
8. That the 6,600 acre facility is subject to South Florida Water Management District (SFWMD) stormwater management permitting requirements and that compost containment areas will be established and maintained so as to contain run-off from a 100-year 3-day storm.

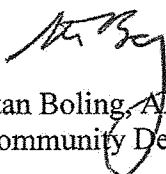
Note: At this time staff is still awaiting access to stormwater management permit plans and data to review and confirm this item, to confirm what construction is required to establish and maintain a stormwater system for the compost areas to meet the 100-year 3 day storm design, to confirm that the system will be adequately completed and then inspected by an outside agency prior to compost or biosolids being brought to the site, and to understand and confirm that an adequate back-up plan is in place in the event that any necessary pumping facilities fail.

Staff appreciates your continuing offer to meet and County Public Works will continue to coordinate with you on stormwater run-off issues.

9. That the facility will cease accepting compost or biosolids on site if and when the facility stormwater management system fails to meet the 3 day 100-year storm design standard.
10. That the Florida Department of Environmental Protection (FDEP) permit holder notify the Indian River County Administrator at the time any permit extension or modification request is made to the FDEP or its successor agency.

Indian River County appreciates the opportunity to confirm information about the project and to understand project commitments. If you have any questions, please do not hesitate to contact me at (772) 226-1253.

Sincerely,



Stan Boling, AICP
Community Development Director, Indian River County

Attachment: Excerpt from FDEP Application

cc: Jason Brown (via email)
Richard B. Szpyrka, P.E. (via email)
Vincent M. Burke, P.E. (via email)
Roland M. DeBlois, AICP (via email)
John W. McCoy, AICP (via email)
John Lang, SJID Administrator (via email)
Patrick B. Cheney (via email)
David Gunter, IRFWCD Superintendent (via email)
Christine Kelly-Begazo (via email)
Dylan Reingold, Esq. (via email)
William K. DeBaal, Esq. (via email)

Section 3 - Facility Design and Operations

3.1 Overview, Background, and Site Design

The agricultural operation associated with this plan is currently known as Sunbreak Farms. The proposed activities associated with this operations plan include the on-site composting of aerobically digested and dewatered biosolids with yard trash debris (green waste). There will be subsequent land application of the Class AA product on Sunbreak's farm acreage. Prior to land application the compost shall meet the regulatory and licensing requirements of 62-640.850, F.A.C. for distribution and marketing.

Sunbreak Farms is located approximately 2.25 miles west of Interstate 95, north of the Florida Turnpike. The farm is located mostly in St. Lucie County with the northern portion lying in Indian River County. See Section 6 for a location map of the property.

Sunbreak Farms consists of 6580 acres of farm land, of which, 640 acres consists of an above ground impoundment used for the storage of irrigation and drainage.

The project will occur on an existing agricultural operation that was formerly known as Cloud Grove. The previously farm operation served as citrus groves for Coca-Cola and Minute Maid since the 1960's. Historically, the farms surface water and water use permits have been regulated and issued by SFWMD (56-00111-S). All site permits are currently in compliance. Irrigation has primarily (and will continue to be) provided by permitted water use from the SFWMD C-25 Canal and storage of water in the above ground impoundment. There are 2 existing, permitted, 100 gpm wells within the boundary of the farm. Per SFWMD documentation these wells are cased to 450+ feet and are not associated with potable water. The previous agricultural property and impoundment were purchased by Sunbreak Break Farms, LLC. The previous citrus groves have been eliminated. The beds and furrows have been knocked down with intent to reestablish the fields in order to grow row crop. Fertility testing by the owner has indicated a reduction in the nutrient and organic profile of the on-site soils.

Sunbreak Farms will establish management areas where composting of aerobically digested and dewatered biosolids to the permitted Class AA standards will be achieved. Biosolids and bulking agents shall only be brought to areas once the berming and grading depicted on the exhibits of Section 6 have been constructed.

Biosolids will be obtained primarily from municipal wastewater treatment plants. The facility is designed to accept 500 tons of biosolids per day on a five day basis. Based on soil fertility testing and recommendations by the facilities farming operations manager, Sunbreak Farms demand for compost is approximately 10 tons per acre. While most deliveries will take place Mon-Fri, the farm requests authorization to accept materials on weekends as needed. The appropriate staffing, record keeping, and monitoring will be made available for such occasions.

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As further outlined in this report, Sunbreak Farms is designed to accept all bulking agents necessary for the complete composting of the biosolids. The bulking agent will consist of chipped yard trash (green waste) and is exempt from Chapter 62-709, F.A.C.

Sunbreak Farms will utilize the Modified Static Aerobic Pile (MSAP) methodology as the primary method of composting. The MSAP methodology is currently accepted by both the US Environmental Protection Agency (EPA) and FDEP. This is evident by other permitted facilities in the State of Florida utilizing this method to produce Class AA fertilizers. The method is in compliance with CFR 503.32(a) for pathogen reduction and CFR 503.33(b) vector attraction reduction. Sunbreak Farms will also incorporate turning the windrows as needed to achieve the necessary pathogen and vector attraction reductions.

Prior to land application on the farm the compost shall meet the regulatory and licensing requirements of 62-640.850, F.A.C. for distribution and marketing. The purpose of the composting is for on-farm use only and composting operations are not intended to be continuous at this point in time. There will be no storage of excess biosolids. Biosolids will be accepted and compost will be generated on an as-needed basis to meet the demands of the normal farm operations. A licensed fertilizer applicator receiving the biosolids will incorporate the product into the farm blocks soil prior to plantings. In the event there are any biosolids or compost materials on-site that exceed the farms fertilization needs these materials will be given away (distributed and marketed) to an acceptable agricultural operation. It is the responsibility of Sunbreak Farms to ensure sufficient licensing, labeling, and packaging in accordance with FDAC's rules for such distribution. As a last resort, excess material may be transported off-site to a landfill. All distribution and marketing will be done in accordance with 62-640.850, F.A.C. and rules referenced therein. Sunbreak shall make available to all users of its biosolids compost information regarding the name and address of the farm; analysis of the compost; a statement of the compost's compliance with quality standards; and recommendations on compost storage and usage that does not exceed agronomic application rates.

Please see Section 6 for the enclosed composting area exhibits.

3.2 Bulking Agent Receiving and Processing

The proposed compost piles required the incorporation of a bulking agent. The bulking agent must consist of chipped yard trash debris (green waste) and mixed at a ratio of 3-to-1 (yard trash to biosolids). When possible the bulking agent will be brought on-site in a suitable chipped form, however, Sunbreak Farm is capable of processing the material on-site. Weight of materials will be recorded at the front office of the farm. The amount of bulking agent brought on-site will be quantified by the shipping contractors and report to the farms front office prior to being placed on-site. All loads will be inspected for suitable materials. Any unacceptable materials will be hauled off-site to the appropriate disposal facility. Additionally, the processed yard trash is required to form a 12" base layer that will optimize the passive windrow aeration.

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