

Solid Waste Management Department

2725 Judge Fran Jamieson Way Building A, Room 118 Viera, Florida 32940

BOARD OF COUNTY COMMISSIONERS

May 10, 2021

Florida Department of Environmental Protection Central District 3319 Maguire Boulevard Orlando, FL 32803

Attention: Mary Powers, Environmental Specialist

Subject: ODOR CONTROL PLAN FOR VEGETATIVE WASTE PROCESSING Brevard County Sarno Road Class III Landfill WACS ID 16255

Dear Ms. Powers:

This letter serves to detail the plan of action that will be taken by the Brevard County Solid Waste Management Department to control offsite objectionable odors that may be associated with vegetative waste processing operations that take place on the top deck of the Sarno Road Class III Landfill. This odor control plan is a result of the March 3, 2021 inspection by FDEP during which "mulch/yard debristype odor" was detected at both the Westwood Condominium and New York Avenue. As discussed during our enforcement teleconference on April 20, 2021, Brevard County Solid Waste Management Department (BCSWMD) requested 30 days to formulate an odor control plan prior to issuance of a Consent Order by FDEP.

Vegetative waste generated in the south portion of Brevard County is brought to the Sarno Road Landfill for processing. The current contract for vegetative waste mulching and transport is held by Consolidated Resource Recovery, Inc. (CCR). Currently, CCR conducts vegetative waste processing operations at two locations concurrently; either at Sarno Road Landfill (Sarno) and Central Disposal Facility or at the Mockingbird Way Mulching Facility (Mockingbird) and Central Disposal Facility. Currently, with processing/transport operations relocating between Sarno and Mockingbird, there are times when processed waste may remain at the Sarno site long enough to become a source of odor while processing and transport equipment has been relocated to Mockingbird. BCSWMD has formulated a plan to reduce offsite odor complaints that may be attributed to our vegetative waste processing operations at Sarno:

<u>Plan A</u>

Brevard County Solid Waste has coordinated with CCR so that either processing/transport equipment is dedicated to the Sarno vegetative waste processing operations, or that transport trucks remain servicing Sarno until all processed material has been removed from the site. This will reduce the amount of time processed vegetative waste remains at the Sarno site and should eliminate the odors associated with composting mulch.

<u>Plan B</u>

If the FDEP continues to associate offsite odors with the vegetative waste processing operations at Sarno despite the increased offsite transportation, mobile odor control devices will be utilized at the landfill in addition to the increased offsite transportation. According to wind direction and intensity, BCSWD will utilize two drum-mounted foggers to release odor neutralizing agents into the air. The fogger jet can be mounted on the bung of a typical 55-gallon poly drum filled with an odor neutralizing agent. The drums will be located on the northeast side of the landfill and will be operated while processed materials remain on site, according to wind direction. The attached figure shows the anticipated approximate location of the mobile odor control units.

<u>Plan C</u>

If the FDEP continues to associate offsite odors with the vegetative waste processing operations at Sarno despite the increased offsite transportation and use of mobile odor neutralizers, passive odor control socks will be placed along the eastern fence of the undeveloped property located northeast of the Sarno Road Landfill in addition to the previous odor control attempts. This property is owned by BCSWMD, but is not utilized for solid waste management. The attached figure shows the anticipated approximate location of the passive odor control socks.

We hope that this plan of action is satisfactory to FDEP. If you have any questions or comments, please feel free to contact me at 321-633-2042 or thomas.mulligan@brevardfl.gov.

Thank you,

Thomas J. Mulligan, Assistant Department Director

Cc: Euripides Rodriguez, Director

Attachment: Approximate odor control device locations

