

Florida Department of
Environmental Protection

Memorandum

TO: District Waste Program Administrators

FROM: Richard B. Tedder, Program Administrator
Solid Waste Section

Chris McGuire, Senior Assistant General Counsel
Office of General Counsel

DATE: December 1, 2003

SUBJECT: Chapter 62-709 (Compost Rule) - Fecal Coliform Testing
Memo # SWM-01.9

The definition of disinfection in Rule 62-701.200(34), Florida Administrative Code (F.A.C.), specifies that disinfection, as relates to composting, is the selective destruction of pathogens indicated by a reduction in indicator organisms to less than or equal to 100 fecal coliform Most Probable Number per gram of Volatile Suspended Solids (MPN/gram VSS). Rule 62-709.530(1)(c), F.A.C., specifies measuring fecal coliform as MPN/gram VSS using Test Method SM 908 found in "Standard Methods for the Examination of Water and Wastewater", 16th Edition, 1985. This value and test method were adopted into Chapter 62-709, F.A.C., when the Compost Rule was promulgated in 1989, and were based on the 1989 draft biosolids guidance and proposed federal regulations - 40 CFR Part 503.

It has come to our attention that there is a more representative measurement available for pathogen evaluation, specifically, 1,000 Most Probable Number per gram Total Solids (MPN/gram TS) - dry weight, using Test Methods 9221 E or 9222 D contained in "Standard Methods for the Examination of Water and Wastewater", 18th Edition, 1992. This reflects the final 503 regulations adopted in 1993. The Department intends to amend the existing target value in Chapter 62-701, F.A.C., and the test method specified in Chapter 62-709, F.A.C., to parallel the biosolids requirements by adopting the 1,000 MPN/gram TS criteria.

It is Department policy that the results of the MPN per gram TS test will be accepted in lieu of the currently specified MPN/gram VSS should any permittee wish to use MPN/gram TS until Chapters 62-701 and 62-709, F.A.C., are amended to reflect this. However, permittees are still allowed to use the currently specified criteria and method if they so choose until such changes are adopted.