

From: [Bartnick, Bill](#)
To: [Bartnick, Bill](#)
Subject: FW: comment on FDACS rulemaking addressing SB712
Date: Friday, November 13, 2020 3:31:26 PM

From: Erich Marzolf <EMarzolf@sjrwmd.com>
Sent: Friday, November 13, 2020 12:10 PM
To: Bartnick, Bill <William.Bartnick@fdacs.gov>
Cc: Andy Canion <ACanion@sjrwmd.com>; Suzanne Archer <sarcher@sjrwmd.com>; Dean Dobberfuhl <ddobberf@sjrwmd.com>; Vickie Hoge <vhoge@sjrwmd.com>
Subject: [External] RE: comment on FDACS rulemaking addressing SB712

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Mr. Bartnick,

Staff from the St. Johns River Water Management District attended the virtual workshop last week on SB712. Here is our comment.

Our thought centers on the appropriateness using “book values” for the analysis of compost. All compost is not created equal. In one recently published study (Grigatti et al. 2019), the total phosphorus (TP) of a green waste compost was 2.64% and the TP of a compost containing biosolids was 8.85%. The two materials had a labile (available) phosphorus concentration both around 25%, so the biosolids compost could have over 3 times more bioavailable P. Recently, agricultural producers have been applying large amounts of compost to improve their soil health. Citrus growers specifically are using compost products to improve the organic matter content of their soil. They are successfully improving their tree health as they battle citrus greening. Large amounts of compost, up to 10 tons per acre annually, are being applied under the trees. We think that all agricultural producers should request analyses of the compost products used since their nutrient content can vary widely, with potential implications for movement offsite. Manures tend to have similar nutrient contents so book values are appropriate for that product.

*Grigatti, M., L. Cavani, G. di Biase, and C. Ciavatta. 2019. Current and residual phosphorus availability from compost in a ryegrass pot test. Science of the Total Environment. 677:250-262.

Thank you for the opportunity to comment.
Sincerely, Erich

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