

PRETREATMENT Communicator

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Coordinator's Desk

For those of you who couldn't attend the February 7-8 pretreatment coordinator's workshop hosted by Broward County, you missed a terrific day and a half. I would like to take this opportunity to thank the County for the excellent venue and their professionalism in organizing this workshop. It was amazing how all this came together so quickly. There were approximately 100 attendees. The first half-day of the workshop included a discussion of Broward County's hauled waste program and a tour of the county's septage receiving facility, followed by a presentation on the upcoming Capacity, Management, Operation and Maintenance (CMOM) requirements. The next day was dedicated to several topics to help pretreatment personnel become more proficient in a number of areas. There were presentations on use of the combined wastestream and flow weighted average formulae, compliance data tracking systems, developing local limits, and pretreatment program significant noncompliance. I felt this was one the best training workshops we have had. The favorable feedback we received from the workshop evaluations confirmed my feeling.

By now most of the approved and pending pretreatment programs, and a few "other" organizations, have received a copy of the ***State of Florida Guidance Manual for Pretreatment Programs***. If you did not receive your copy at the February workshop or via mail, you will get it at your next scheduled compliance inspection or audit.

(See Coordinator, page 3)

FLORIDA INDUSTRIAL PRETREATMENT ASSOCIATION (FIPA)

A message from the President

by
John Parnell

The next FIPA meeting will be held at the Gainesville Regional Utilities Building, in, as you would expect, Gainesville. Fred Williams (williamsfd@gru.com) has set the date for Friday, June 14, 2002 and the tentative meeting times will be 9:00am till 3:00pm. The agenda is still in the process of being compiled. Be sure to mark your calendars and plan to attend.

The association is at present arranging a partnership with the Florida Water Environment Association (FWEA) to sponsor a workshop at the end of the year (probably October) to focus on the Centralized Waste Treatment (CWT) category. This should be a great opportunity to listen to some high power presentations on this subject so we will keep you informed as the arrangements proceed. Finally, the next FWPCOA short school will be in Cocoa Beach during the week of August 12th to 16th, 2002. We will be offering the "C" class once again as we had a very good turnout (22 students) at the last short school in Ft. Pierce. Whether the "B" and "A" classes are held will depend on the number of students that pre-register. We must have at least 8 students or the class will probably be canceled. If you are considering either of these classes, get your application in as early as possible so that we can reach our target of 8. Hope to see you in Gainesville. PS - FIPA is still accepting proposals of artwork for a logo of the organization by sending the designs to me via email at john.parnell@stpete.org

Regulatory D ragnet

U.S. EPA Headquarters Press Releases

CONNECTICUT COMPANY TO PAY \$3 MILLION FOR WATER VIOLATIONS

MacDermid Inc., a chemical manufacturer in Waterbury, Conn., pleaded guilty to four felony violations of the Clean Water Act and was sentenced on Nov. 28 to pay a \$2 million fine and \$1 million for supplemental environmental projects. MacDermid manufactures over 1,000 chemicals used for metal treating, plating and other purposes. The plant wastewater is required to be pretreated before being released into the Waterbury city sewer system, and the company is required to submit to the Connecticut Department of Environmental Protection discharge monitoring reports (DMRs) concerning the level of chemicals contained in the treated wastewater it releases. For eight years or longer, MacDermid engaged in a set of unlawful practices, such as discarding wastewater samples that had high levels of pollutants and failing to report analyses of such samples, which led to the falsification of its DMRs. As a result, wastewater with unacceptably high levels of copper and zinc was released into the Waterbury sewers. The release of wastewater with high levels of copper and zinc into sewer systems can cause damage to sewage treatment plant equipment and also kill bacteria needed to digest and properly treat sewage at sewage treatment plants. The case was investigated by EPA's Criminal Investigation Division with the assistance of EPA's National Enforcement Investigations Center and was prosecuted by the U.S. Attorney's Office in Bridgeport.

NEW HAMPSHIRE MEN CHARGED WITH ILLEGAL SEWAGE DISCHARGE

The indictment of Frederick B. Lawrence Jr., and Bradley G. Beaudoin, both of Troy, N.H., was announced on Nov. 30. Lawrence, chairman of the Troy Water and Sewer Commission, and Beaudoin, the superintendent of the Troy Waste Water Treatment Plant, were charged with installing an illegal pipe that allowed raw sewage and wastewater to leak into the Ashuelot River. Such pollution can make the waters unsafe for drinking, recreation, fish and wildlife. An indictment is merely an accusation and all defendants are presumed innocent unless or until proven guilty in a court of law. If convicted, each defendant faces a maximum sentence of up to three years in prison and/or a maximum fine of up to \$250,000. The case was investigated by EPA's Criminal Investigation Division with the assistance of EPA's National Enforcement Investigations Center and is being prosecuted by the U.S. Attorney's Office in Concord, N.H.

FORMER IDAHO REPAIR SHOP MANAGER PLEADS GUILTY

Kevin H. Jonely, former manager of Mac's Radiator & Repair Inc., Garden City, Idaho, pleaded guilty to violating the Clean Water Act. In his plea, the defendant admitted that instead of hiring a licensed hazardous waste disposal firm to remove and dispose of lead-containing hazardous waste, he directed employees to help him break up the waste and flush it down the facility's sewer clean-out. He had been previously notified by a Garden City official that he did not have a Clean Water Act discharge permit to discharge the waste into the city sewer system, which was not designed to treat hazardous waste. The waste contained approximately 4,400 parts per million lead. Lead is a toxic metal which can be harmful to fish and wildlife and can cause neurological and learning disorders in people. When sentenced, the defendant faces a maximum sentence of up to five years in prison and/or a fine of up to \$250,000. The case was investigated by EPA's Criminal Investigation Division, the FBI, the Idaho State Police, the City of Boise and the City of Garden City. It is being prosecuted by the U.S. Attorney's Office in Boise.

FORMER ILLINOIS REFINERY MANAGER CONVICTED OF WATER VIOLATIONS

Ronald Snook of Coal City, Ill., former Environmental Manager at Premcor's Blue Island Refinery, near Chicago, was convicted of conspiring to violate the Clean Water Act (CWA) and concealment of information from the Metropolitan Water Reclamation District of Greater Chicago (MWRD). Snook conspired with Premcor; Elva Carusiello, Premcor's former Environmental Engineer and Assistant Environmental Manager at Blue Island; and Environmental Monitoring and Technologies Inc. (EMT), of Morton Grove, Ill., a consultant to Premcor, to not report violations of the Blue Island Refinery's CWA discharge permit. The permit limited the pH of the refinery's wastewater discharges and also limited the amount of fats, oils and grease that the refinery could release into sewers operated by the MWRD. The scheme involved failing to report tests that indicated the refinery was out of compliance with its discharge permit. The discharge of wastewater with higher than permitted levels of pollutants and a high or low pH value, can harm sewage treatment equipment and also harm fish and wildlife. In previous court actions in this case, Premcor paid a \$2 million fine, EMT paid a \$50,000 fine and Carusiello pleaded guilty to a CWA violation. When sentenced, Snook faces a maximum sentence of up to five years in prison and/or a \$250,000 fine on each count. The case was investigated by EPA's Criminal Investigation Division with the assistance of EPA's National Enforcement Investigations Center, and is being prosecuted by the U.S. Attorney's Office in Chicago.

...Coordinator (Continued from page 1)

This manual has been dubbed the Florida Guidance Manual (FGM). The FGM was developed to assist developing, as well as already approved pretreatment programs. The manual can be used as a guide to start a new program or to enhance an existing program. It has taken several years to develop the FGM and could not have been possible without the assistance of the following individuals:

Janet DeBiasio, City of St. Petersburg
Laverne Hodge, Polk County
Tony Manello, City of Oldsmar (now with the City of Dunedin)
Jerome Mickens, Hillsborough County
Kelsi Oswald, Pinellas County
Rick Ruede, City of Lakeland

I would also like to acknowledge the work that Chris Jensen of the Tallahassee DEP pretreatment staff has done on the FGM. When Chris joined our staff, I told him I had one project that needed to be completed before he started on anything else. I told him he could learn about the pretreatment program while he was completing this assignment. I'm not sure Chris would have taken this job if he really knew how many problems he would encounter as he pulled this manual together. I won't go into the gory details, but suffice it to say that he had his hands full. To Chris' credit, he was able to complete the organization, editing, and reformatting of the FGM last July. After some "fine tuning," the FGM was sent to the City of Hollywood for copying and binding. The City of Hollywood provided this service as an "in-kind" penalty project in lieu of a monetary settlement of a DEP enforcement case. Many thanks to the city for this creative way to resolve a penalty, at the same time helping the pretreatment program with a monumental task. Thanks to everyone who has helped

to make the FGM a useable product. I encourage each of you to refer to the FGM often as a source of guidance whenever you have a pretreatment related question. We have included copies of examples of many checklists, etc. that should be of use. If you find any errors or have suggestions for additions or clarifications to the manual, please let us know. This manual will be periodically updated to reflect changing regulations and/or policies. This project was funded, in part, with a grant from the United States Environmental Protection Agency.

I have been working with the Florida Water Environment Association (FWEA) and the Florida Industrial Pretreatment Association (FIPA) to help coordinate a specialty workshop on the permitting of Centralized Waste Treatment (CWT) facilities. The workshop will include the industrial facilities, the pretreatment programs and, state and federal regulators. At this point the workshop is targeted for October in the Orlando area. Please watch for future notification on this activity.

Speaking of the FWEA, I would like to extend my congratulations to **Burgess "Andy" Johnson** on receiving the 2002 Albert B. Herndon Pretreatment Award at the 2002 Florida Water Resources Conference in March. Andy has been involved with the City of Orlando pretreatment program for many years and has contributed to the betterment of the pretreatment programs in Florida. He is very deserving of this award. I understand that Andy is planning on retiring later this year. When you see Andy, congratulate him and let him know that his presence will be missed at our pretreatment activities.

On a final note, I hope you take time to read about the newest DEP pretreatment

(see Coordinator, page 6)

Meet the Pretreatment Staff's Newest Member

Marc Harris



I came to the Pretreatment Program from DEP's Pollution Prevention Program, where I assisted industry and local government staff with negotiated pollution prevention (P2) projects that improved their facilities' operations and practices while reducing environmental impacts and in some cases regulatory reporting requirements.

Prior to the P2 Program, I was the Environmental Engineer and ISO Coordinator for Jack M. Berry, Inc., a citrus juice processing plant in Southwest Florida, for two years. My responsibilities included development and implementation of standard operating procedures and work instructions from fruit receiving to fruit processing to juice shipping to QA/QC to ancillary activities in order to meet the standards for ISO 9000 (quality) and ISO 14000 (environmental) management systems. In addition, I supervised all three shifts of the QA/QC laboratory and was responsible for ensuring compliance with federal, state, and local rules and regulations for drinking water treatment, industrial wastewater discharge, air emissions, and hazardous waste management.

As a result of working with all levels of staff on various types of projects, my background includes production scheduling, material handling, unit operations, inventory control and equipment maintenance -- just to name a few. I don't hold a wastewater operator's license of any level although I do have a Class C drinking water operator's license; most of you would probably argue that potable water is the source of your wastewater headaches. I look forward to assisting the pretreatment coordinators in continuing to implement successful pretreatment programs.

F.I.P.A Workshop June 14, 2002



GRU administration building.

Sponsored by Gainesville Regional Utilities and the FDEP

Clear your calendars

More details will be forthcoming

Pretreatment Program Assignments

As mentioned in the Coordinator's Desk column, the pretreatment program assignments have been reshuffled. Below is a list of active pretreatment programs and the assigned inspector.

Paul Brandl



Altamonte Springs
Apopka
Broward County
Casselberry
Charlotte County
Clearwater
Davie
Escambia County
Ft. Lauderdale
Ft. Myers
Ft. Walton Beach

Hillsborough County
Hollywood
Largo
Manatee County
Miramar
Orange County
Orlando
Perry
Pinellas County
Plant City
Plantation

Reedy Creek Improvement Dist.
St. Petersburg
Sunrise
Tampa

Marc Harris



Bay County
Boca Raton
Clay County
Deland
JEA
Leesburg
Marion County

Ocala
Palm Beach County
Panama City
Port St. Joe
Sanford
Seacoast Utilities Authority
Seminole County

South Central WWTP
St. Augustine
St. Johns County
West Palm Beach
Wildwood

Christopher Jensen



Auburndale
Bartow
Cocoa Beach
Daytona Beach
Ft. Pierce
Gainesville
Holly Hill
Lake Alfred
Lake City
Lakeland
Loxahatchee ECD

Madison
Melbourne
New Smyrna Beach
Oldsmar
Ormond Beach
Palm Bay
Pasco County
Polk County
Port Orange
Rockledge
Stuart

Tarpon Springs
Titusville
Vero Beach
Winter Haven

...Coordinator (Continued from page 3)

engineer, **Marc Harris** (see Marc's profile on page 4). Marc replaced Sal Resurreccion, who left DEP for the Corp of Engineers in Jacksonville. Marc started with us in February and is a welcomed addition to the staff. With Marc's background in pollution prevention (P2), he will be an asset to all of us. Please feel free to contact Marc to welcome him and to pick his brain with P2 questions. I have included a listing elsewhere in this newsletter of the new program assignments as a result of personnel changes to my staff. Please take note of your DEP program engineer, it may have changed.

Keep up the great work you are doing out there. I'll see you at your next inspection or FIPA workshop (June 14).

Bob Heilman

State of Florida
Pretreatment Coordinator



Congratulations to

Mr. Mark Morris
City of Vero Beach Pretreatment Program

Mr. Robert Evans
City of Plant City Pretreatment Program

Ms. Cheryl Staley-Archer
Orange County Pretreatment Program

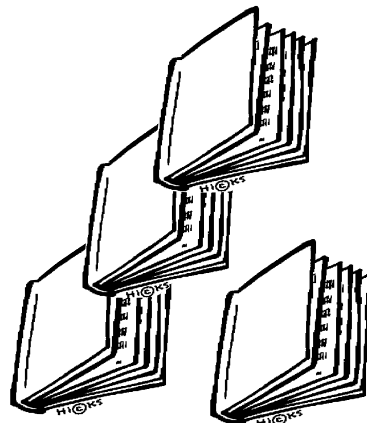
Their facilities were nominated for potential receipt of a 2002 Clean Water Act Recognition Award. The Recognition Awards acknowledge facilities that demonstrate a commitment to protecting and improving the Nation's waters. Their facilities were nominated in the pretreatment category.

Pretreatment Training Manuals from the Florida Pretreatment Coordinators Training Workshop (February, 1999)

Blow-out Prices
\$15 each or \$25 for the set
* hurry...only a few left *

Pretreatment Program Fundamentals & Industrial User Classification and Permitting

These are excellent pretreatment Manuals
Produced by the EPA
Contact : Erik Melear @
(407) 246-2151
or
erik.melear@ci.orlando.fl.us

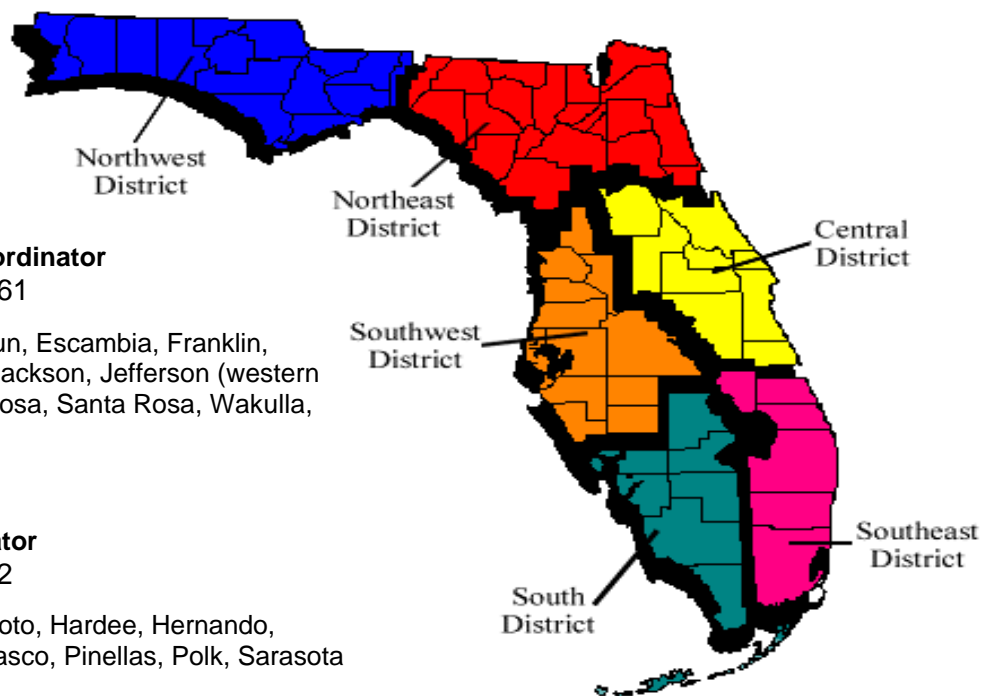


Do you or your industrial users need help?

It may be time to seek assistance from one of DEP's Pollution Prevention (P2) Coordinators if you or your staff lack the time, resources or expertise to help industries with identifying pollution prevention solutions to their discharge problems.

The P2 Coordinators are committed to helping Pretreatment Program Coordinators with implementing pollution prevention requirements by partnering with them on inspections and site visits at industries or through referrals.

For more information on the services that the P2 Coordinators can provide look at the map and talk to the Pollution Prevention Coordinator in your area.



Northwest District

Brenda Leonard, P2 Coordinator
(850) 595-8300 Ext. 1261

Jurisdiction: Bay, Calhoun, Escambia, Franklin, Gadsden, Gulf, Holmes, Jackson, Jefferson (western half), Leon, Liberty, Okaloosa, Santa Rosa, Wakulla, Walton, & Washington

Southwest District

Al Gephart, P2 Coordinator
(813) 744-6100 Ext. 372

Jurisdiction: Citrus, DeSoto, Hardee, Hernando, Hillsborough, Manatee, Pasco, Pinellas, Polk, Sarasota & Sumter

South District

Laura Comer, P2 Coordinator
(239) 332-6975 Ext. 170

Jurisdiction: Charlotte, Collier, Glades, Hendry, Highlands, Lee & Monroe

Northeast District

Christopher Bodin, P2 Coordinator
(904) 807-3300 Ext. 3370

Jurisdiction: Alachua, Baker, Bradford, Clay, Columbia, Dixie, Duval, Flagler, Gilchrist, Hamilton, Jefferson (eastern half), Lafayette, Levy, Madison, Nassau, Putnam, St. Johns, Suwannee, Taylor, & Union

Central District

Debby Valin, P2 Coordinator
(407) 893-3323

Jurisdiction: Brevard, Indian River, Lake, Marion, Orange, Osceola, Seminole, Volusia

Southeast District

Paul Thompson, P2 Coordinator
(561) 681-6759

Jurisdiction: Broward, Dade, Martin, Okeechobee, Palm Beach, & St. Lucie

Technical Tip ...



More Laboratory Quality Assurance

Best 2 out of 3 Proficiency Tests
By

Paul Salerno

Proficiency testing demonstrates a laboratory's ability to perform analysis on blind samples using a method producing enforceable results. In each pretreatment program the use of sample analysis to determine the compliance of the industry is the basis of the enforcement response plan. How do you know the laboratory you are using is still certified for the tests you require?

If the lab has been inspected by the Florida Department of Health (FDOH) and has met the requirements, you should obtain a copy of its National Environmental Laboratory Accreditation Conference (NELAC) accreditation certificate. The certificate should be placed in your program file. To validate the lab's proficiency, you will need to obtain a copy of the last three proficiency studies performed. These studies are required to be performed every six months by FDOH and there must be at least one month between retesting studies and the scheduled studies. Be sure to ask if there were other tests performed to eliminate the use of the best three instead of the latest three. Discuss with your lab notification procedures of any analytes that have not passed the most recent two of three proficiency tests.

You should generate a list of analytes you use from that lab in your program and match the results to verify the lab has passed 2 of the last 3 most recent proficiency tests of your usable



analytes. Should there be a failure (rated "Not Acceptable") of an analyte in one of the three tests, there should be an accompanying letter to FDOH which addresses the deficiency and how it will be, or has been corrected. The performance evaluation of "Acceptable" or "Check for Error" means the results are within the acceptable limits provided by the NELAC accredited sample provider.

If two of the last three proficiency tests of an analyte have failed, the lab could be decertified for that specific test. Contact the lab immediately and discuss how the certification is being handled. Using a decertified analyte in the compliance monitoring where the industry was found to be in violation may not stand up in court. Should using a decertified analyte in monitoring occur, resample as soon as possible and use another lab that is certified in that particular analyte.

Working together with the lab director to provide usable data for your program is an essential part of the compliance expectations. For further information the website <http://www.epa.gov/ttn/nelac> provides accredited proficiency test providers and links to proficiency testing requirements.

The author is the Pretreatment Coordinator and Lab Director for the City of Port Orange. In addition, he is the current president of the Florida Society of Environmental Analysts (FSEA).

Quick Quiz ...

1. A comprehensive and effective enforcement response plan must adequately reflect the POTW's primary responsibility to enforce all applicable pretreatment standards and requirements.
 - A. True
 - B. False
2. POTW personnel can determine whether a discharge may generate gas/vapor-toxic conditions by comparing gas/vapor toxicity criteria to pollutant concentrations in an industry's discharge.
 - A. True
 - B. False
3. Baseline monitoring reports are not required to contain any additional information if the pretreatment standards are not being met on a consistent basis. (Rule 62-625.(600)(1) Florida Administrative Code.)
 - A. True
 - B. False
4. If monitoring is necessary to measure compliance with the 40 CFR 413 & 433 TTO standards, the industrial user always needs to analyze for all of the pollutants in the TTO list.
 - A. True
 - B. False
5. Which of the following types of information should not be entered into a field notebook during inspections?
 - A. names and titles/positions of all facility personnel interacted with during inspection
 - B. weather conditions
 - C. unusual conditions or problems
 - D. opinions or observations regardless of support.
6. Material inventory is one of the general elements of a _____.
 - A. self-monitoring report
 - B. discharge permit
 - C. slug control plan
 - D. chain-of-custody form
7. Baseline monitoring reports for the Centralized Waste Treatment category (40CFR437) were/are due :
 - A. July 21, 2002
 - B. July 21, 2001
 - C. September 9, 2001
 - D. December 15, 2003
8. Which of the following should not be used as criteria for determining a proper response to a violation? (except when deciding to pursue criminal prosecution)
 - A. Magnitude of the violation
 - B. knowledge, intent, or negligence
 - C. Duration of the violation
 - D. Effect of the violation on the receiving water
9. What is the compliance date for Existing Sources in the Transportation Equipment Cleaning category ?
 - A. August 14, 2003
 - B. August 14, 2002
 - C. September 9, 2002
 - D. July 21, 2002



Answers: 1-A; 2-A; 3-B; 4-B; 5-D; 6-C; 7-B; 8-B; 9-A

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The **Pretreatment Communicator** encourages participation from its readers and any other individuals interested in pretreatment in the State of Florida. Please submit your letters, information, or articles to Pretreatment Communicator, Domestic Wastewater Section, Florida Department of Environmental Protection, 2600 Blair Stone Road MS 3540, Tallahassee, Florida 32399-2400. The **Pretreatment Communicator** reserves full editorial rights to all submissions.

Anyone with questions or comments about this newsletter or wanting to be included on the mailing list should contact the pretreatment program staff at the above address or at (850) 488-4524. The Department of Environmental Protection assumes no responsibility for the statements or opinions expressed in this newsletter. Views and information contained in this newsletter are those of the authors and do not necessarily reflect those of the Department.

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