

# PRETREATMENT COMMUNICATOR

December 2009, Volume 14 Issue 3

Published by the Florida Industrial Pretreatment Association

**COORDINATORS DESK** 

Dawn Templin FDEP Pretreatment Coordinator

Rulemaking activities associated with revisions to Chapter 62-625, F.A.C., continue. The Department will publish the Notice of Proposed Rule in the Florida Administrative Weekly on December 18. The notice is available at the following website:



### http://www.FLRules.Com/gateway/View\_Notice.asp?i d=7839557

The Department often receives questions regarding the local limits re-evaluation requirement listed in Section VII of the wastewater discharge permits. Pretreatment programs should refer to Chapter 7 of EPA's 2004 *Local Limits Development Guidance* for information on re-evaluating local limits. If there are questions, please contact your pretreatment program inspector.

As mentioned at the last FIPA meeting, the Department has a new pretreatment program engineer, **Charlotte Cope**. Please welcome her when you meet her.

The Department is here to assist you concerning your pretreatment program. Please contact **Hsiang Chou-Hoofman** at (850) 245-7566, **Sam Jinkins** at (850) 245-8609, **Charlotte Cope** at (850) 245-8607, or me at (850) 245-8601, if you need assistance or have questions.

Have a great holiday season.





# DEFUSING THE THREAT: PASCO COUNTY RESPONDS TO COLLECTION SYSTEM INCIDENT

Farouk EL-Shamy, Ph.D. Pasco County, Florida

How does a utility prepare for intentional dumping of hazardous chemicals by non-industrial facilities or individuals? Significant industrial users must be evaluated to determine if they are required to develop a slug control plan. These plans include several elements which are cited in state and federal regulations. Much of the slug discharge plan covers the procedures used to notify the POTW in the event of spills or slug discharges. The objectives of early notification are to enable the POTW to anticipate the nature and volume of the slug, prepare adequate responses, and protect the public safety, utility infrastructure, wastewater treatment plant, and its receiving stream.

However, slug control plans don't help the utility respond to chemicals after they enter the system. In this case you may not know the source, composition, or amount dumped. For example, a boat owner decides to pour old gasoline down the drain. Or a mobile auto-repair shop owner elects to open a manhole where he lives, and pour used solvents into the sewer. How can the POTW respond to these unknowns?

When encountering these situations, utilities need what may be called an accident emergency response plan (AERP). A written AERP was what was missing when (Continued on page 3)

#### TRAINING OPPORTUNITES

Spring 2010 Spring 2010 Spring 2010 May 19-21 FIPA Workshop FIPA A,B,C IP Voluntary Cert. Course FIPA FOG Voluntary Cert. Course NACWA Pretreatment & P2 Workshop http://www.nacwa.org/ Tallahassee TBD TBD Phoenix, AZ



#### A MESSAGE FROM THE OUTGOING PRESIDENT

Mark Mathis FIPA President



We are certainly living in interesting times to say the least. This is especially true when considering alternate sources of energy. For example the mother company of a permittee in the Fort Pierce

pretreatment program has a contract with Florida Power & Light to manufacture and provide curved mirrors for a solar power venture that is currently in the works. Parabolic mirrors focus and concentrate sunlight onto active solar cell materials. Special solar cells convert the intense light into electricity. Until now solar power has been too expensive for any practical application on a large scale. Advances in manufacturing processes are helping to reduce the cost of solar power. For years the protective paint coating on the back side of mirrors contained lead. Now, advances in the composition of paint materials for mirrors used in the production of solar power allows the manufacturer to mass produce lead free mirrors capable of withstanding high temperatures. The absence of lead is a huge plus for the environment as we move towards environmentally friendly products. The bottom line is that the overall cost of solar power production is coming to down to an affordable range making solar power on a large scale somewhat attractive.

On a personal note...

Serving you as association president for the past two years has certainly been a pleasure. It is time now for me to turn the reigns over to the new president Athena (Thea) Parslow. Thea has a creative imagination and vision with which to lead the association. I am confident that the newly elected board under Thea's leadership will surprise you with many great accomplishments!



### THE BIG CHILL: EPA PROPOSES NEW CATEGORICAL STANDARDS

Effluent guidelines are the industry specific national (categorical) regulations that control the discharge of pollutants to surface waters and to publicly owned treatment works (POTWs).

This program is mandated to continually review current guidelines as well as new industries or processes that may require development of (Continued on page 3)

### CONGRATULATIONS TO THE 2010-12 FIPA BOARD OF DIRECTORS

President:	Athena Parslow
Vice President:	Gary Christiansen
Treasurer:	Randy Greer
North Regional Coordinator:	Linda Fielder
Central Regional Coordinator:	Kevin Shropshire
South Regional Coordinator:	Holly McGrath
Past President:	Mark Mathis
Education Chair:	Susanna Littell
Sponsor Coordinator:	Dan Dashtaki



The **Pretreatment Communicator** is a semi-quarterly production of the Florida Industrial Pretreatment Association (FIPA). The **Pretreatment Communicator** encourages participation from its readers and any other individuals interested in pretreatment in the State of Florida. Please submit any comments, ideas, or articles to Pretreatment Communicator c/o Dan Parnell, 21 W. Church St. T-8, Jacksonville FL 32202 or email to <u>parndp@jea.com</u>. The Pretreatment Communicator reserves full editorial rights to all submissions. FIPA 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 FIPA. Editor – Dan Parnell



#### (Chill, Continued from page 1)

categorical standards.

As Florida pretreatment programs waited in cool anticipation, the EPA finally proposed standards for airport deicing operations. Deicing chemicals used at airports are collected by storm water drainage systems and can be discharged to local water bodies or in some instances to the POTW.

However, even in the frozen tundra of Jacksonville, the proposed rule is expected to have little impact. Florida programs that may be concerned with impending ice ages can review and comment on the proposed rule by clicking <u>here.</u>

#### **CONGRATULATIONS!**

To **Andy Johnson** for receiving the FIPA Lifetime Membership Award. Andy was honored in recognition of his outstanding dedication and creative contributions as a former member of the Board of Directors.

#### **MISSING a LINK?**

Below are links to government and nongovernmental organization websites serving the pretreatment and wastewater professions. Just click on the name to visit the site.

Florida Industrial Pretreatment Association

FDEP Pretreatment

FDEP Draft Water Rules

EPA Pretreatment

EPA Pretreatment Publications

EPA Effluent Guidelines

Florida Water Environment Association

Florida Water and Pollution Control Operators Association

National Association of Clean Water Agencies

Water Environment Federation

#### (Spill, Continued from page 1)

a similar accident happened a couple of months ago. Without this plan, it became a challenging learning experience when an unknown volatile chemical was discovered in the collection system servicing a strictly residential neighborhood.

Pretreatment coordinators typically do not respond to emergencies, especially from an unknown source, but rather find the source after the incident had been addressed. However, as a chemist and hazardous waste manager, I was asked to quickly respond to an illegal dumping of "what smelled like fuel". Chemist do not make judgments based on smells. Samples needed to be collected and analyzed, data to confirm or deny, and it was needed immediately. Because the flow could not be diverted, the pump station servicing the subdivision was shut down. While this stabilized the situation temporarily, this course of action led to a gradual rise in wastewater throughout the collection system with the contaminant floating on top. Fortunately, the incident happened at mid day when wastewater generation from the homes was low. Samples were collected and sent to the county laboratory for analysis. Since the county's laboratory could not perform the required analyses, the samples were then sent to a contract laboratory. With several days before analytical confirmation of the substance, there was no choice but to treat the contaminant as a fuel. At the pump station, which acted as a trap for the substance, continual measurement of the lower explosive limit (LEL) was conducted. Atmospheric monitoring consistently showed flammable vapor concentration within the explosive range. The county was confronted with three issues; accumulation of very high levels of flammable gas in the pump station, lack of ventilation throughout the system, and a rise in the wastewater levels in the sewer lines potentially leading to a sanitary sewer overflow (SSO). In order to eliminate the risks associated with the first two issues, entry to the pump station was strictly limited and the use of portable electronics such has telecommunication devices was prohibited near the station. To accelerate ventilation, (Continued on page 4)



### (Spill, Continued from page 4)

manhole covers throughout the subdivision were opened. The third issue was the most difficult because the liquids at the pump station and in the collection system needed to be removed simultaneously in order to avoid multiple SSOs. Compounding the situation, the county did not have any contracts with emergency response companies to perform these tasks. Once removed from the system, the contaminated liquid must be hauled to a facility that could properly manage this waste stream. The POTW could not accept the wastewater at any of our plants due to the possibility of the waste being hazardous or harming the plant. Also, the plant could have been considered a hazardous waste treatment facility for accepting the waste. As you may expect, it is difficult to locate a treatment facility that accepts contaminated sewage; this was not petroleum contact water (the common water contaminated with petroleum products). As a matter of fact, it took hours to find a treatment facility that would accept this waste.

There were several lessons learned from this incident. First, there must be an AERP ready to activate in emergencies. After the incident was resolved, Pasco Co. began designing its own AERP. Next, have a long term contract with an emergency response company that can respond quickly. Also, make sure your laboratory can provide you with field test results expeditiously to profile the foreign substance allowing better preparation prior to mobilization.

Remember, spills of flammable or explosive materials may require the notification of the local fire department and/or hazardous response department. Be sure to take repeated readings of gases (preferably with different meters) to make sure you do not have false results. Finally, in the event of an illegal dumping where the quantity and identity of the substance is unknown, you must treat it as an emergency.

While these may have been difficult lessons to learn, all was not in vain, Pasco Co. now has a response plan which can be activated in these situations, you live and learn.



## MODEL BEHAVIOR

With the Florida Administrative Code chapter 62-625 revisions on their way, many pretreatment programs may need to revise their local ordinance or control mechanism. In 2007, EPA published a modified pretreatment model ordinance document which includes the streamlining changes.

The new model ordinance makes it easy to track the upcoming changes. The document clearly differentiates between the streamlining elements that are mandatory and optional.

While the model ordinance is a great resource to start revising your control mechanism, remember it only has the federal modifications so it does not contain changes solely proposed by the State. Click on <u>Model Ordinance</u> to get a copy in Word or pdf.

FIPA and FDEP Wishes Everyone A Happy and Safe Holiday Season !!