



# Pretreatment Communicator

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## Department Notes

**Tom Shiflett**

**FDEP Pretreatment Coordinator**



My name is Tom Shiflett, and I am the new State Pretreatment Coordinator. I enjoyed meeting many of you at the recent FIPA meeting in West Palm Beach. I wanted to take this opportunity to introduce myself, tell you about a staffing change, and discuss some required changes to most existing sewer use ordinances and enforcement response plans.

I joined the Department in September of 2010 after working for the Department of Corrections for several years as a Regional Engineer in central Florida. My primary responsibilities were water and wastewater compliance at state prison facilities. I also worked for the Florida Department of Health in the drinking water program. I am a graduate of the University of South Florida in Tampa. I am excited about my new position and looking forward to working with all of you.

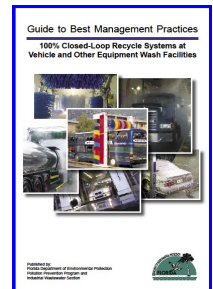
We have had a recent staffing change. Charlotte Cope accepted a position in the Solid Waste section of the Department's Pensacola District Office. We are in the process of recruiting a new inspector and anticipate a starting date of December 1. The new inspector will be responsible for programs previously handled by Charlotte. I do not anticipate any other changes.

As was discussed in the May 2010 column, revisions to the pretreatment rule, 62-625 F.A.C., became effective on May 10, 2010. The final rule is posted <http://www.dep.state.fl.us/legal/Rules/wastewater/62-625.pdf>. The rule revises certain definitions, adds certain requirements for industrial user (IU) permits, requires a Plan of Study prior to local limits development, revises certain reporting requirements for Con-

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## Talkin' About The Car Wash, Yeah

Keeping those rags and machines hummin' can result in the discharge of suspended solids, oil and grease, and detergents to the sanitary sewer system. Many car washes are considered "closed loop" and recycle the cleansing water, however the grey water eventually becomes too soiled to re-use and must be discharged. The Florida Department of Environmental Protection has published the *Guide to Best Management Practices for 100% Closed-Loop Recycle Systems at Vehicle and Other Equipment Wash Facilities*. This BMP addresses types of wash facilities, pollutants, storage, spills, pretreatment, maintenance and safety. It is a great resource for the pretreatment staff as well as vehicle wash facilities. To get a copy of the BMP [click here](#).



## Training Update

- 2011 FIPA Spring Certification Courses and Workshop, Date TBD; Orlando, FL [Website](#)
- May 9 & 10, 2011 WEF Industrial Wastewater Seminar; Atlantic City, NJ [Website](#)
- May 18-20, 2011 NACWA National Pretreatment & Pollution Prevention Workshop; St. Louis, MO [Website](#)



## A Message From the President



**Thea Parslow**  
**FIPA President**

Mercury is a pollutant of concern identified by EPA which Pretreatment Programs must evaluate for a local limit. Although power plants burning fossil fuels emit mercury most of it goes up the stack rather than into the sewer system. A report published on the Medscape Today website states, "Of the approximately 48 tons of mercury released into the air annually as a result of human activity in the United States, electric power generation contributes about 40%." To address this source of mercury, the EPA is developing Total Mass Daily Limits (TMDL) for mercury from coal burning power plants. The agency expects to have the rule established by September 2012. Did you know that volcanoes also spew mercury into the atmosphere?

Of course from a pretreatment standpoint we are concerned about the levels of mercury discharged to POTWs. On the wastewater side EPA has identified sources of mercury that are indirectly discharged to receiving waters through domestic wastewater facilities. In 2002, the National Association of Clean Water Agencies (NACWA) released a report showing dental clinics are the main source of mercury discharges to domestic wastewater facilities. However, the American Dental Association (ADA) funded a study that produced results showing that only 1/2 of the mercury discharged to domestic wastewater facilities comes from dental clinics. So who is right?

*(Continued on page 3)*

## Notes *(con't from 1)*

Control Authorities (CA) and IUs, includes optional changes for CA sampling and inspections, and allows the use of Best Management Practices as a pretreatment standard.

The Control Authorities must now incorporate the revisions into their existing program documents. As many of you know, this has been a comment in our recent program inspection letters. We suggest that all programs begin revising their SUOs as soon as possible. We will continue to ensure the required changes are made as part of our pretreatment program inspection process. If your permit is reissued prior to making the necessary changes, it will be issued with a condition or an order requiring the change.

Also, please make sure that all Annual Reports comply with the new signatory requirement contained in subsection 62-625.600(12), F.A.C. The annual reports must be signed by a principal executive officer, ranking elected official, or other duly authorized employee. The duly authorized employee must be an individual or position having responsibility for the overall operation of the WWF or the pretreatment program. This authorization must be made in writing by the principal executive officer or ranking elected official, and submitted to the Department prior to or together with the report being submitted.

If you have questions about the required revisions or your pretreatment program in general, please feel free to contact our pretreatment folks here in Tallahassee at (850)245-8605. The Department looks forward to working with you this quarter.



## Message *(con't from 2)*

A lot has been done to reduce and control mercury discharges from dental amalgam. For example installing amalgam separators in dental facilities is recommended by the ADA as a Best Management Practice. Why is it then that some states and local pretreatment programs require the installation of amalgam separators in dental facilities? It looks like EPA is about take away the voluntary use of amalgam separators and mandate their use in every dental office in the US. And guess who gets to enforce the regulation once it becomes law? The pretreatment community. I hope EPA takes effluent and residuals disposal practices into account as they vary widely from one POTW to the next. For example a number of POTWs in Florida dispose of treated effluent under the Underground Injection Control (UIC) program and landfill their dewatered residuals.

Although a lot of uncertainty looms around EPA's ever changing stance on mercury source control, one thing you can count on, FIPA will be watching pending regulation for mercury discharges and will provide sensible comments to EPA on behalf of pretreatment programs in Florida!

## The Envelope, Please

The following recipients were recently honored for their contributions to Pretreatment in Florida.

**Brian Dean** received FIPA's Life Membership Award for his work establishing the Florida Industrial Pretreatment Association.

**Rob Powers** was honored with the John Parnell Award for making significant contributions in promoting the industrial pretreatment program.

**Mark Mathis** accepted the Robert Heilman Award on behalf of the Fort Pierce Utility Authority Pretreatment Program for utilizing innovative communication and regulatory approaches to achieve compliance and protect the environment.



Thea Parslow, Mark Mathis, and Gary Christiansen present the FIPA Life Membership Award to Brian Dean.

Rob Powers recipient of the John Parnell Award.



Mark Mathis receives the Robert Heilman Award on behalf the Fort Pierce Utility Authority.

## Separator Anxiety

In September, the EPA announced it will develop pretreatment standards through the Effluent Guidelines program for the control of amalgam from dental offices.

The EPA's goal is to propose a rule in 2011 and finalize it in 2012. The purpose of this regulation will be to reduce mercury discharged from dental offices by requiring these facilities to install amalgam separators. Amalgam separators can remove up to 95% of the mercury from dental effluent. All communities have dentists, so this rule will impact all pretreatment programs. Since the rule establishes pretreatment standards, local control authorities will be responsible for implementing the program within their jurisdiction, monitoring compliance and taking appropriate enforcement actions. With its potential implications this rule is one all pretreatment coordinators need to track, review, and comment on as necessary. Click [here](#) for more information.



The **Pretreatment Communicator** is a semi-annual 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 [parndp@iea.com](mailto:parndp@iea.com). 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

## A Spoon Full of Medicine

September was a busy month for the EPA; besides announcing the plan to regulate dental amalgam it also published a draft Management Practices for Unused Pharmaceuticals at Health Care Facilities (click [here](#) to review the draft BMP). The draft BMP addresses pharmaceutical disposal practices at hospitals, long term health care facilities, and medical offices. It provides guidance to these health care facilities on how to implement pro-



grams to minimize accumulation of unused pharmaceuticals as well as how to properly dispose of them. The EPA was accepting comments on the draft document through November 8th, with a goal of producing a final BMP by the end of 2010. The agency is emphatic the BMP is for guidance only and does not carry any federal requirements for health care facilities. However, utility's concerned with pharmaceutical disposal in the sanitary sewer may find the final document a useful tool when regulating health care facilities.

### Florida Industrial Pretreatment Association

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Or on

Face Book

## I'm Ore-gone!

**Dan Parnell**

**Editor Pretreatment Communicator**

This will be my final edition as the editor of the *Pretreatment Communicator*. Beginning in January, I'll be living near Portland and performing the duties of Pretreatment Coordinator for the City of Gresham, Oregon.

I have truly enjoyed being a part of the FIPA family. Through the Association I have made many friends and learned much about pretreatment. Active involvement in FIPA has helped me and many other pretreatment professionals deal with the many challenges our programs face. If you appreciate the efforts of FIPA volunteers and sponsors to better equip you with the tools needed to do your job, then the best thanks you can give is to pitch in and help; join a committee, run for the board, teach a certification class, present at a workshop, or write an article. By the way, I hear there's an opening for newsletter editor.

Please keep in touch, I'm only an e-mail (don't know the new one yet) or phone call away (cell # 904-502-9017).

