



Pretreatment Communicator

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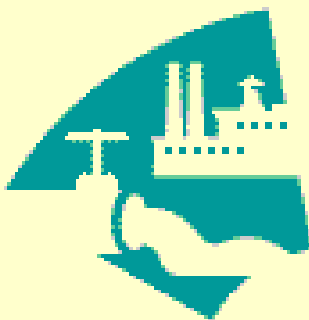
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Department Notes

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FDEP Pretreatment Coordinator



I hope everyone had an opportunity to meet Mr. David Phillips from the US EPA, Region 4, Water Enforcement Branch at the recent FIPA meeting in Silver Springs. We appreciate David taking time out of his busy schedule to attend the meeting and answer your questions. Ms. Randi Peddie, the newest member of the Tallahassee pretreatment staff, was also at the meeting.

David provided a pretreatment update on the regulation of fats, oil and grease (FOG), and I would like to emphasize FDEP pretreatment staff are now reviewing sanitary sewer overflow reports as part of the pretreatment program inspection process. We have also included FOG related questions on the pretreatment inspection checklist.

As most of you know Chapter 62-625, F.A.C. was revised May 10, 2011. The revision will require all programs to update their sewer use ordinance and may require updating other program documents. Updates to your program documents will be required during your next pretreatment program inspection or when your wastewater (continues on page 2)

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Message from the President

Dirty Dishes - Cleaner Lakes

By Athena Parslow



If you have an automatic dishwasher at home you may have noticed that your dishes don't appear to be getting as clean as they used to. Don't rush out and replace your dishwasher just yet.

A lot of people have been having similar experiences since detergent manufacturers re-formulated automatic dishwashing detergent to comply with new environmental laws. Such laws in 16 states including Florida became effective in July 2010. A 2005 Minnesota study suggests that 19% of the phosphate discharged to municipal wastewater systems came from household dishwashing detergent. New regulations require phosphate free dishwashing detergents. Rather than producing dishwashing formulas for the affected states, manufacturers no longer use phosphates in their dishwashing detergent formulas. The elimination of phosphates in the detergent is the likely cause of spots on dishes especially in areas that have hard water.

While phosphate (phosphorus) is a nutrient that is essential to both plant and animal life aquatic plants require far less phosphorus than land-based organisms. Excess amounts of phosphorus entering receiving waters accelerate a process known as eutrophication, which is the rapid growth of algae than can cause dense algal blooms.

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treatment facility permit is re-issued. The revisions include both the required changes and optional provisions adopted by the EPA in Title 40 Code of Federal Regulations, Part 403. We recommend reviewing the EPA Model Pretreatment Ordinance, since it outlines which changes are required and which are optional. The EPA Fact Sheets explain each of the changes. The EPA model SUO and fact sheets available online at

<http://cfpub.epa.gov/npdes/pretreatment/streamlining.cfm>

Please ensure 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 with, the annual report. In addition to the signatory authorization letter, your annual report should include the pretreatment discharge monitoring reports.

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



FOG Committee Update

FIPA's FOG committee recently made revisions to the unified waste manifest. FIPA created the unified waste manifest in the fall of 2008 in cooperation with former DEP Pretreatment Coordinator, Robert Heilman. FIPA makes generic waste manifests available to Florida pretreatment programs for use in holding waste generators and haulers accountable for waste hauled to municipal wastewater facilities. Manifest revisions add fields for more detailed generator, waste type and hauler information. Look for the revised version of the manifest by visiting the FIPA website at fipaonline.com. ■

Multi-jurisdiction Agreements

By Mark Mathis



Instances in which a regional wastewater facility provides treatment and disposal service for one or more outside contributing jurisdictions,

the responsibility for compliant operation lies with the regional facility. Compliant operation includes the implementation of an approved Industrial Pretreatment Program if required. While a multi-jurisdiction agreement identifies the parties and the responsibilities of each, the primary function of such agreements is to provide the receiving jurisdiction with the legal authority to enforce pretreatment program requirements outside of its jurisdiction. There are options as to which entity performs the function of the Control Authority inside the contributing.

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Message (con't from 2)

Such algal blooms also cause severe environmental damage by killing fish and other aquatic organisms and result in "dead zones" that favor the survival of invasive species such as carp over native species." A first hand close up look at algae covering the eel grass during a recent glass bottom boat tour of the Silver River at Silver Springs underscores the need for tighter controls over nutrients. The environmental threat posed by nutrients is real and must be dealt with. Source control of phosphorous is perhaps the best solution and its elimination from dishwashing detergent is a good start. However, the removal of phosphate from dishwashing detergent is sure to be the low hanging fruit. Source control of the remaining 81% of phosphate entering municipal wastewater systems will be a bigger challenge. For more information on getting good results with automatic dishwashers visit cascadeclean.com, and, seventhgeneration.com for environmentally friendly products. ■

Award Nominations

FIPA is accepting award nominations through August 15, 2011, in the following award categories. The Heilman award is an outstanding pretreatment program award. The Parnell award is presented to an individual recognized by peers as having made significant contributions through participation in workshops, writing articles, teaching certifications courses or other contributions to pretreatment programs in Florida. Award nomination forms are available at the FIPA website at fipaonline.com. ■

Agreements (con't from 3)

For example a multi-jurisdiction agreement can authorize the regional wastewater facility to act as the Control Authority in the contributing jurisdiction. Such an arrangement may not be economically feasible for pretreatment program implementation by the regional wastewater facility considering that bulk wastewater service rates alone may not cover the expense of extra-jurisdictional program implementation. The failure to anticipate Control Authority pretreatment program implementation expenses is a flaw in even the most carefully crafted multi-jurisdiction agreement.

Excess strength surcharges is another area often over looked in multi-jurisdiction agreements. Details as to how excess strength surcharges will be recovered need to be identified in the agreement. Surcharges can be hefty in cases where an industrial user discharge characteristics have high BOD, TSS and or nutrient loadings. Of course high loadings drive treatment expenses up for the regional wastewater facility.

Although these cost considerations add complexity to a multi-jurisdiction agreement it is far better to anticipate and address them up front that to find your utility losing money on a bulk service deal. One should anticipate that the contributing jurisdiction may argue that program implementation expenses are already reflected in the bulk service rate. Not!

One alternative to program implementation cost recovery would be for the contributing jurisdiction to act as the Control Authority. In such a case the regional wastewater facility should evaluate the program implementation capabilities of the contributing jurisdiction. However, the receiving jurisdiction is ultimately responsible for the protection of its wastewater system should the contribution jurisdiction fail to enforce pretreatment program requirements.

According to the requirements of pretreatment program annual reports contained in 62-625.600, "Control authorities shall provide the Department with a report that briefly describes the control authority's program activities, including activities of all participating agencies if more than one jurisdiction is involved in the pretreatment program."

As such, a multi-jurisdictional agreement should include reporting requirements for contributing jurisdictions. It is preferable for any regional wastewater facility that is developing a multi-jurisdiction agreement to submit a draft to the pretreatment folks in Tallahassee for review and comment prior to executing the agreement. Appendix 3C of the Florida Guidance Manual for Pretreatment Programs is a wonderful resource for multi-jurisdiction agreements. The Florida Guidance Manual can be accessed at, www.dep.state.fl.us/water/wastewater/dom/pt_fgm.htm. ■

