



# Pretreatment Communicator

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## THE COMMUNICATOR...

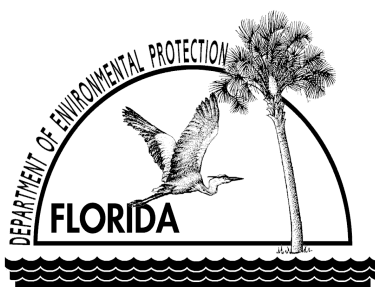
"The Communicator" is a quarterly publication of the Pretreatment Program for the Florida Department of Environmental Protection. The Communicator encourages participation from its readership and any other individuals interested in pretreatment in the State of Florida. Individuals wishing to contribute letters, information, or articles should submit them to:

The Communicator  
Domestic Wastewater Section  
FDEP, MS 3540  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

The **Pretreatment Communicator** reserves full editorial rights to all submissions. Anyone with questions about this newsletter, wishing to make comments, or wanting to be included on our mailing list, should contact the pretreatment program staff at (850) 488-4524 or write to the above address. 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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## Florida Department of Environmental Protection Domestic Wastewater Section Pretreatment Program

Robert Heilman, P.E.  
Pretreatment Coordinator

Gary Millington  
Pretreatment Engineer

John Coates, P.E.  
Pretreatment Engineer

## Department to Unveil New Domestic Wastewater and Pretreatment Web Pages

by John Coates, P.E.

The Department is finalizing new World Wide Web (WWW) pages that cover many domestic wastewater topics including the pretreatment

(Please see **Web Pages**, page 2)

## Treatment Plant Award Winners!

by Kathlyn Gaither  
and Mary Smith

The Department of Environmental Protection (DEP) hosted its *Annual Plant Operations Excellence Award* program in Tallahassee on November 13. Division of Water Facilities Director Mimi Drew presented awards to eight domestic wastewater facilities, along with a number of other drinking water and industrial wastewater facilities. Consideration for the awards are based on maintenance, compliance, innovative treatment, waste reduction, pollution prevention, conservation, recycling or other special achievements.

"These water facilities have demonstrated excellent operational procedures," said Drew. "The awards provide a way for DEP to recognize them for a job well done."

"The protection of our water is crucial. I am proud that DEP is able to honor 21 facilities for their outstanding operations," said DEP Secretary Virginia Wetherell.

Award categories for domestic wastewater facilities are divided into groups, based on treatment

(Please see **Winners!**, page 6)

## Regulatory Updates:

- Revisions to Chapter 62-640, F.A.C., were approved at the August 28, 1997, meeting of the Environmental Regulation Commission (ERC). However, the effective date of the rule has been delayed pending resolution of questions from the ERC related to surface water setback requirements. This issue will be addressed at the January ERC meeting.
- EPA is still working toward a final rule to replace the freon extraction based Oil and Grease test methods. On October 2, 1997 (62 FR 51621), EPA made additional analytical data available for public review and comment. Stay Tuned!
- EPA has announced an information collection request to gather additional technical and economic information in order to develop revised effluent guidelines for the iron and steel manufacturing point source category. According to EPA, iron and steel facilities have been placed on a list of 10 sectors to receive increased scrutiny because data indicate high rates of noncompliance.

## Web Pages

(Continued from page 1)

program. The pages can be accessed at:

[http://www.dep.state.fl.us/water/wf/dom/dom\\_page.htm](http://www.dep.state.fl.us/water/wf/dom/dom_page.htm)

The domestic wastewater pages provide a wealth of information about domestic wastewater in Florida. The information includes facts on the generation and disposal of wastewater in Florida as well as

## Nominations for the Albert B. Herndon Award

Nominations are requested for the 1997 Albert B. Herndon Award. This award, established in 1992, is presented each year to outstanding individuals who are responsible for administration or enforcement of either a pretreatment program or industrial wastewater regulations. The award is named in honor of Al Herndon, P.E., who served as Chief of Industrial Pretreatment for EPA Region IV for more than 20 years until his retirement earlier this year.

The general criteria for the award are listed below. These criteria should be used as a guide when submitting nominations for the award.

- appropriate level of responsibility
- pretreatment program's performance
- nominee's knowledge of regulations
- working relationship with industrial users
- program innovations
- length of service
- nominee has technical expertise and a positive attitude

Nominations should be submitted to the Industrial Wastewater Committee of the Florida Water Environment Association before December 31, 1997. You may forward your nominations in care of Bob Heilman at the Florida Department of Environmental Protection, MS 3540; 2600 Blair Stone Road; Tallahassee, Florida 32399-2600.

Good Luck to all who are nominated!

the requirements for permitting activities for domestic wastewater facilities. A lot of information is also provided on topics of special interest such as reuse, wastewater to wetlands, and residuals management in Florida.

The pretreatment staff are especially looking forward to getting our web pages online. As you would expect, the pages provide general information about pretreatment in Florida. For example, we have provided a map which includes approved pretreatment programs in Florida.

In addition to general information, the Web pages also provide access to frequently requested pretreatment software and files in a link to "download pretreatment related files." At present the available files include:

- DEP's annual report guidelines;
- the Local Limit Information

Development System (LLIDS) program, version 1.02;

- a list of Pretreatment References;
- EPA's PCME program, version 3.1;
- EPA's Treatability database, version 5.0;
- EPA's 1992 Model Pretreatment Ordinance;
- EPA's Economic Benefit (BEN) Model, version 4.2

In addition to these files, this page provides a link to EPA's Point Source Information Provision and Exchange System (PIPES) Web page. From EPA's PIPES pages you can download additional files.

Adobe Acrobat versions of each of the past issues of the Pretreatment Communicator are also available from the pretreatment web pages. In the future, we would like to add more Adobe Acrobat files for a number of useful pretreatment policy letters and guidance documents.

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## by Gary Millington

(Please see **Assistance**, page 5)

Technical Paper

If you would like to discuss this approach in greater detail, please contact one of the pretreatment staff at (850) 488-4524.

*The Coordinator's Desk:*

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## News from Norfolk

by Robert Heilman, P.E.

I had a very enlightening time in Norfolk, Virginia at the 1997 AMSA/EPA Pretreatment Coordinator's Workshop. There were a number of topics, discussions, and papers that provided several insights into what other EPA regions, states, and POTWs are doing with regard to pretreatment. I returned with many ideas and some possible new directions for the State of Florida pretreatment program. I'd like to share some of my thoughts with our readers and get some feedback before implementing these concepts.

Some of the liveliest and most interesting discussion was concerning the development of technically defensible local limits. In a breakout session with folks from other parts of the country, I heard many similarities when it came to dealing with local limits. We discussed the need for proper data collection, plant removal efficiencies, the use of default data, how to deal with data below detection limits, industrial user allocation, and computer assisted calculations. There was not enough time to thoroughly discuss the above issues, but it became clear that the State of Florida needs some sort of policy or guidance to ensure consistency in the above areas. To that end, we will be preparing a draft policy/guidance on developing local limits sometime in 1998. Ultimately, the final document will probably be incorporated into Chapter 62-625, Florida Administrative Code.

Another area that we will be developing a strategy for will be the implementation of the Department's Performance Partnership Agreement (PPA) with EPA. I found out that most states have PPAs with EPA, Florida being no exception, and those states have been able to modify their pretreatment program oversight in accordance with those agreements.

By way of background, the PPA is an agreement with EPA that outlines how various delegated programs will be operated. In the past, oversight of the delegated federal programs was conducted under a set of specific commitments which were very inflexible. The PPA provides a great deal of flexibility in conducting oversight of delegated programs. The goal of the PPA is to minimize the somewhat meaningless "bean counting" and focus on resolving problems that result in improved environmental results. Under the PPA, there is a possibility that if you have an "excellent" pretreatment program, you may not see us for a couple of years! However, if your program is "struggling," you may see us several times in one year. I think you get the picture. At any rate, we will be looking at these issues this federal fiscal year.

To nobody's surprise, Pollution Prevention (P2) also received a good deal of attention. I believe P2 is where we need to go in conjunction with the existing pretreatment requirements. Many discharge violations and problems could be minimized through a good P2 program. In 1998 I would like to develop a pretreatment program policy that implements P2 in the state's pretreatment programs. I will be soliciting help from the approved programs to develop that policy. If anyone would like to volunteer to assist in that effort, please let me know.

There was a very interesting session on innovative approaches to pretreatment. While the proposed pretreatment streamlining regulation language, that I wrote about in the past, provides for the regulation of SIUs through the use of best management practices (BMPs), there is currently no restriction on using BMPs to control non-SIUs. To that end, several control authorities are using

BMPs to control the discharges of mercury, silver, and other pollutants. I feel strongly that, if properly and consistently implemented, the use of BMPs is a viable means of controlling certain discharges. That is not to say that BMPs are a panacea to the pretreatment program, but there is a place for their use. I would like to encourage more control authorities in Florida to begin seeking legal authority and implementing BMPs for certain categories of dischargers.

A final issue that concerns me a great deal is the handling of hauled waste. Currently, EPA is developing guidance on this topic, which should be out in about 18 months or so. In Florida, it appears that most cities do not accept hauled wastes. However, those that do, do not appear to have adequate control mechanisms in place. I plan to inventory the approved programs to determine which programs have hauled waste policies/regulations and what, if any, control mechanisms are used. The results of the inventory would possibly result in the development of a state policy or guidance dealing with the handling of hauled wastes. I would like to cover all hauled wastes including septage, marina wastes, chemical process wastes, portable toilet wastes, and grease. I may be a bit ambitious in my coverage, but I believe there is an immediate need for guidance in these areas.

Overall, the 1997 AMSA/EPA workshop provided an excellent opportunity to exchange many ideas. It was great to see nine of Florida's pretreatment programs represented. I encourage more control authorities to attend these meetings in the future. Please feel free to contact me on the above, or any other issue, if you would like to have input. Otherwise, stay tuned as we enter into 1998 for changes to the pretreatment program. ☺

## Water Reuse 98

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**What:** The world's preeminent conference devoted entirely to water reuse.

**Features:** Technical Sessions                      Poster Sessions  
Sunday Workshops                      Reuse Tours

**When:** February 1-4, 1998

**Where:** Orlando

**Sponsors:** American Water Works Association  
Water Environment Federation

### In Association With:

- Florida Section/American Water Works Association
- Florida Water Environment Association
- Florida Water & Pollution Control Operators Association
- National Water Research Institute
- Water Reuse Association of California
- U.S. Bureau of Reclamation

### Additional Information:

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Housing & Registration	Joanne Gaglia	303/347-6158
	jgaglia@awwa.org	
General Questions	Paul Lehnertz	303/347-6184
	plehnert@awwa.org	

*Use it Again, Florida!*

## Assistance

(Continued from page 3)

The DEP hopes to, among other things, increase environmental education of small businesses, promote the use of pollution prevention and minimization techniques, and identify opportunities to develop Best Management Practices (BMP). These goals fit very well into the pretreatment arena, since we have (through you) a significant level of contact with industrial users. However, it is not a goal of the DEP pretreatment program to become actively involved with the EISP. Rather, we will try to incorporate activities from this program into the pretreatment program as found appropriate.

As it turns out, the term "technical assistance" is probably not the best title for this article. Technical assistance is more often used to describe those who provide assistance for a fee (i.e., consultants). The term "compliance assistance" is more appropriate for my goal here. The reason for this is that government agencies are not usually in a position to provide technical assistance. There are obvious reasons for this and they will probably not change. For example, the DEP is largely a regulatory agency and can not get too deeply involved with technical assistance because of liability and conflict of interest issues. However, there are many incentives for us to improve compliance assistance to increase compliance rates and to reduce the potential for environmental damage.

As many of you know, searching the internet can be time consuming and may provide few results. Well, in some ways that has happened to me lately. It appears to me that, as with many government initiatives, the areas of technical and compliance assistance are evolving at a pretty rapid pace. It is not easy to see where they are headed. There also appear to be several avenues to pursue – and they are not necessarily headed in the same direction. EPA has the Common Sense Initiative (CSI) program that is geared toward the creation of specific projects to improve the way environmental issues are handled – to make them more efficient. They also have Compliance Assistance Centers (CAC). The EPA also has the Project XL and the Sustainable Industry Project. I believe the CACs will be more useful to pretreatment programs in general.

Compliance Assistance Centers are virtual centers (i.e., internet based) for collecting and coordinating information specific to industrial sectors. At the present time there are four Compliance Assistance Centers. They are the National Metal Finishing Resource Center (NMFRC), the Printer's National Compliance Assistance Center (pneac), CCAR GreenLink – the Automotive Compliance Information Assistance Center, and the National Agricultural Compliance Assistance Center. Centers that are being planned include the Small Chemical Manufacturers Center and the Printed Wiring Board Center. The web site address for the CACs is <http://es.epa.gov/oeca/mfcac.html>. This program is coordinated through EPA's Office of Enforcement and Compliance Assurance.

The NMFRC appears to be the most mature of these centers, probably because of the financial resources

available to the industry and the history of compliance problems. The site provides a lot of information regarding vendors, manufacturing facilities (national list) environmental regulations, manufacturing problems and other information. Some of it is provided only to its members.

The CCAR GreenLink has a virtual auto repair facility with hyperlinks attached to the important objects in the garage. You can easily find disposal and other information for used oil, tires, parts washer fluids, and others. This is nice and easy to use. This site could become very important to you if and when the Metal Products and Machinery (MP&M) regulations come out.

We encourage you to take advantage of the Manufacturing Technology Centers and our Pollution Prevention folks in Tallahassee. Maybe you could hold a meeting and invite one of these groups to speak to your industrial users.

As I am finishing this article, we just received an EPA document we requested entitled, “Role of the EPA Inspector in Providing Compliance Assistance, Final Report.” It looks interesting so I will plan to summarize it next time as well as provide updates and information on additional

## Reminders:

- The next Florida Pretreatment Coordinator Certification course will be conducted March 30 through April 3, 1998 in Ft. Pierce. Participants can pick up course materials on Sunday, March 29, from 1-5:00 p.m. Both the Level B and Level C courses are planned. Please plan on registering at least a month before the course is offered. You may contact Rosemary Tilley at (407) 267-5452 for more information.

## Pretreatment Program Assignments

In the April 1997 **Pretreatment Communicator**, we mentioned that we were assigning one of the pretreatment program staff as a primary contact for the active pretreatment programs. Below is a list of those assignments as of October 1997. If the listed person is not available, please contact Bob Heilman for assistance.

<u>John Coates</u>	<u>Gary Millington</u>
Bay County	Altamonte Springs, City of
Boca Raton, City of	Apopka, City of
Broward County	Auburndale, City of
Clay County	Casselberry, City of
Clearwater, City of	Escambia County
Davie, Town of	Ft. Lauderdale, City of
Daytona Beach, City of	Ft. Myers, City of
DeLand, City of	Ft. Walton Beach, City of
Ft. Pierce, City of	Gainesville, City of
Hollywood, City of	Hillsborough County
Jacksonville Electric Authority	Lake City, City of
Largo, City of	Lakeland, City of
Loxahatchee RR WWTP	Madison, City of
Margate, City of	Manatee County
Marion County	Melbourne, City of
Ocala, City of	New Port Richey, City of
Oldsmar, City of	Okaloosa County
Orange County	Palm Bay, City of
Orlando, City of	Palm Beach County
Panama City, City of	Pasco County
Port Orange, City of	Pinellas County
Reedy Creek Improvement District	Plant City, City of
Sanford, City of	Plantation, City of
Seacoast Utilities Authority	Rockledge, City of
Seminole County	Sarasota County
South Central WWTP	St. Petersburg, City of
St. Augustine, City of	Tampa, City of
St. Johns County	Tarpon Springs, City of
Vero Beach, City of	Titusville, City of
West Palm Beach, City of	
Wildwood, City of	

## Winners!

(Continued from page 1)

plant size. Congratulations to the following winners!:

## Type I

- Falkenberg Advanced Wastewater Treatment Plant, Tampa
- Florida Cities Water Company, Fiesta Village

Wastewater Treatment Plant,  
Ft. Myers

- North Brevard Wastewater Treatment Plant, Mims
- Hurlburt Field Advanced Wastewater Treatment Plant, Hurlburt Field
- South Central Regional Wastewater and Disposal Board, Delray Beach
- City of St. Augustine, St. Augustine





Hey Joey, Should we get the gang together and go on an inspection !

