

# PRETREATMENT COMMUNICATOR

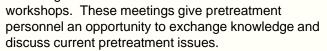
May 2008, Volume 13 Issue 1

# Published by the Florida Industrial Pretreatment Association

# Coordinators Desk

Dawn Templin
FDEP Pretreatment Coordinator

We were pleased to see a number of pretreatment programs represented at the April FIPA meeting held in West Palm Beach. As always, pretreatment programs are encouraged to attend the FIPA



On the new front, the Department is beginning to evaluate draft rule language to incorporate the EPA revisions of 40 CFR 403 into Chapter 62-625, F.A.C. We are in the process of developing a schedule for rulemaking, so stay tuned. Also, the Department has a new pretreatment program engineer, Paul Chang. I am sure you will be meeting him on inspections shortly. Please welcome him when you meet him. An issue that we would like to bring to everyone's attention this guarter is the pretreatment requirements found in your wastewater facility permit. These requirements are found in Section VII of the permit. Of particular interest is the requirement to re-evaluate local limits within 180 days of permit re-issuance to verify that the local limits are still protective of the wastewater treatment facility. We have noticed that several pretreatment programs have not submitted the re-evaluation by this due date and therefore, are not in compliance with the permit requirement. Pretreatment program supervisors should be aware when the permit is re-issued, so they can ensure the local limits re-evaluation is completed by the due date. If the pretreatment program cannot meet the due date because of circumstances beyond its control, a permit modification must be requested from the Department's District Office. As some pretreatment programs are already aware, the Department is issuing noncompliance letters when

this permit requirement is not met.

We have also noticed that many programs are having problems completing the pretreatment discharge monitoring reports (DMRs). DMR instructions can be found on the Department pretreatment website at: <a href="http://www.dep.state.fl.us/water/wastewater/dom/docs/">http://www.dep.state.fl.us/water/wastewater/dom/docs/</a>/Pretreat DMR Instruc.pdf

If you are still unsure on how to correctly complete the pretreatment DMRs, please contact your pretreatment program inspector in Tallahassee. The Department looks forward to working with the pretreatment programs this quarter.

# The Missing Link

Gary Christiansen JEA

As we all know the Florida Industrial Pretreatment Association (FIPA) is an organization for individuals working in or associated with the Industrial Pretreatment (IP) profession. FIPA acts as a forum for members to help create innovative, pragmatic and sustainable solutions to meet challenging industrial pretreatment needs. FIPA joins wastewater professionals, regulators and regulated, across state boundaries and across wastewater disciplines by providing a network for sharing a wealth of knowledge, experience, ideas and information. One of the most important facets of the association is the avenue of communication opened between industrial pretreatment officials and the industries they regulate. Most of us have learned through experience it is much easier for an industry with well trained, knowledgeable personnel who understand the language and can interpret regulation to stay in compliance. Kenneth Nichols a Wastewater Supervisor from Millennium Specialty Chemicals in Jacksonville had the following to say about his membership in the Florida (continued on p.4)

### TRAINING OPPORTUNITES

June 24 & 25 EPA/WEF FOG Management Phoenix, AZ

http://www.wef.org/ConferencesTraining/Seminars/FOG/

July 24 & 25 FIPA Summer Workshop St. Augustine

www.fipaonline.com

Oct. 18-22 WEFTEC Chicago, II
www.weftec.org

Nov. 10-12 The Florida Green Lodging Conference Gainesville

http://www.treeo.ufl.edu/conferences/GreenLodging/



# A MESSAGE FROM THE PRESIDENT

Mark Mathis FIPA President



# Tax Reform

Most city and county taxing authorities in Florida have already started tightening the purse strings due to the potential losses in revenue brought about by tax reform. Depending on the financial

position and stability of your agency, tax reform can have far reaching effects.

Probably everyone would agree that fire and police protection are priority funding areas. No one wants to the loose this type of protection or see changes for the worse in response time.

How will tax reform affect agency pretreatment programs?

That's a tough question. One area that's usually the first to be restricted during budget crunches is travel and training. While we all hope that this isn't the case we also have to be realistic. If given a choice between travel and training and fire and police protection the later would win every time.

So how can pretreatment programs help their agencies in tough times?

One area that should not be overlooked is that of excess strength wastewater surcharges. You probably already have a good idea which industrial users contribute conventional pollutants BOD, COD and TSS to your wastewater system. If your agency doesn't have a surcharge program and industrial user monitoring data shows a pattern of conventional pollutant levels that exceed what your rates are designed to cover you should take a closer look at surcharges.

<u>Justifying a Surcharge Program</u>

Domestic wastewater plants are designed to treat

(Continued on p. 3)

# NEW STATE PRETREATMENT COORDINATOR NAMED

**Dawn Templin** was recently named the Florida Department of Environmental Protection Pretreatment Coordinator. CONGRATULATIONS Dawn!

# **FIPA SUMMER WORKSHOP**

# "Industrial Pretreatment's Role in ...The Road to Sustainability"

Join us in the Nation's First City for the FIPA summer workshop. Our next workshop will be in St Augustine on July 24 & 25. This summer's event will focus on industrial user water conservation and pretreatment program's role in providing reliable reclaimed water. We will be meeting at the Holiday Inn Hotel & Suites (<a href="https://www.staugustinehi.com">www.staugustinehi.com</a>) in the St Augustine historical district. Along with the main workshop on Friday; we will have a Thursday afternoon tour and program at the Guana National Estuarine Research Reserve (<a href="http://www.gtmnerr.org/">http://www.gtmnerr.org/</a>) as well as a social gathering in the evening.

To reserve your room call 800-569-8008 and ask for the Florida Industrial Pretreatment Assoc. group block by July 10th. An individual tax exempt form must be presented at check-in to avoid a 9% sales tax charge. The room rate is \$94.00 per night and has been extended to cover Wednesday through Friday night should you desire to extend your stay and enjoy the sights in this historic city. The room rate includes an \$8.00 breakfast voucher for use at the breakfast buffet. This rate is available on a first come first served basis and good only on rooms reserved prior to July 10 so get your reservations in as soon as possible.

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 <a href="mailto:parndp@jea.com">parndp@jea.com</a>. 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

# (Message Continued from p. 2)

domestic wastewater, not high strength wastewater from industry. Municipal wastewater rates are usually structured to recover operation and maintenance (O&M) costs for the conveyance, treatment and disposal of wastewater equal to the domestic strength. The definition of the domestic strength for BOD and TSS may vary from one utility to the next. If your sewer use ordinance defines the domestic strength for BOD and TSS for wastewater at 250 mg/L, your rates probably don't cover the costs to treat BOD and TSS exceeding this concentration. That is, unless there's a mechanism, such as a surcharge program, in place to recover the additional costs.

If you've been thinking about developing a surcharge program but have yet to take the plunge, you may not find a better time than now to do it. Keep in mind that you're probably not going to make a lot of money off surcharges. However, what a surcharge program will do for you is help to recover the O&M costs that result from excess strength wastes entering your wastewater system. During times like these chances are that your wastewater utilities director would welcome the opportunity to offset O&M costs by implementing a surcharge program for excess strength wastewater.

# FLORIDA WATER ENVIRONMENT ASSOCIATION IP AWARD WINNERS ANNOUNCED!

During the May Florida Water Resource Council Conference held in Tampa, the L.L Hedgepeth and Albert Herndon awards were presented to the 2008 winners:

**Ken Nicholls** of Millennium Specialty Chemicals was presented with the **L.L. Hedgepeth Award** for his achievements as an industrial wastewater operator.

Dan Parnell was the recipient of the Albert Herndon Award.

# **CONGRATULATIONS!**

### **GET YOUR FOG ON!**

Waste Haulers are weighed down with different waste manifest from every city and county in the Florida. Municipalities are faced with developing an oil and grease management program. What if there was a program that the whole state could benefit from? That is what the FIPA FOG Committee has been working on for the past few months. The committee has developed a manifest that will serve the purpose of collecting grease trap compliance data. The final draft will be sent to one centralized printing company. The waste hauler will purchase the manifest directly from the printing company. The benefits for the municipality are no more printing cost, shipping cost, or running out of manifest. Benefits for the waste hauler are reduction of different manifests that the driver is required to carry and preprinted hauler information reduces time spent preparing manifest. More information will be provided as soon as the final draft in available.

A lot of hard work went into the development of the unified manifest and FIPA would like to give special thanks to the following committee members:

Thea Parslow, City of Orlando Chairperson Dan Dashtaki, City of Orlando Mark Mathis, Fort Pierce Utilities Authority Gary W. Christiansen, JEA Richard Underwood, TWA Penny Woodruff, Brownies Septic Services Rob Powers, Clearwater Michelle Helms, FCS Frankie Dibenelelto Grease Depot Monica Swearingen, Earth America Jorean Washington, Orange County Susanna Littell, Orange County Michael Connolly, Linko Matt Wotowiec, Pinnellas County Jorge Allwood, St Pete Rodney R Hyde, Pasco County Kizuwanda Agee, Hillsborough County

If anyone has any questions please contact Thea Parslow at 407-246-2664.

# **GOOD FORM!**

If you have not checked it out recently, the Florida Department of Environmental Protection's Industrial Pretreatment web site has many of the forms and documents you may need.

FL Guidance Manual for Pretreatment Programs Annual Report Instructions Pretreatment Inspection Interview Form Plan of Study Summary Instructions for DMR Reporting Download for LLIDS

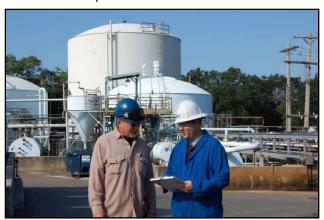
If you need a FDEP form just go to: http://www.dep.state.fl.us/water/wastewater/dom/pretreat.htm

# (Link, Continued from page 1)

Industrial Pretreatment association:

"I have had the benefit in my 16 years as a wastewater operator to walk both sides of the fence. I started my career in this field at a municipality and have seen first hand what an industry, when left unchecked, can do to a POTW. Eleven years ago when I got into the industrial side of treatment it was an eye opening experience. From my experience I have learned that the majority of regulated industries don't have the individuals who fully understand the impact they can have on the POTW. The plant operators are not always trained in wastewater treatment, other than their own operation. Getting involved with FIPA would enhance any industrial operator's knowledge and understanding of the whole process of protecting POTW's and receiving streams. By attending the work shops and or certification courses, regulated industries would get the first hand knowledge of why there has to be a local or state pretreatment program and how that program works. Also, there are not a lot of places where industry operators get a chance to network with others and share experiences both good and bad. FIPA has given me the opportunity to do this and has also shown to me that pretreatment coordinators are willing to help an industry meet compliance when struggling with their operation. When an industry knows the pretreatment regulations and knows there is someone out there willing to help them meet those regulations it creates a better working relationship between the two parties. A better relationship can lead to a more focused attention to the treatment process and more consistent permit compliance.

On another note, in my opinion, FIPA would also benefit from having more industrial dischargers as members. During work shops there would be a more diverse dialog among attendees as both sides of any issue could be presented."



Kenneth Nichols from Millennium Specialty Chemicals and Gunar McKendree from JEA Industrial Pretreatment compare notes during an annual inspection

There are several ways we can generate more interest among our industries. You can share this newsletter, visit or ask to speak at manufacturing or industrial trade organization meetings in your area, send a web link for the FIPA website to your permit holders or just bring it up during your next inspection. I have been involved with several organizations over the years and one thing has held true to all. If you are not growing... You are dying... I would like to challenge each FIPA member to invite one new member of industry to one of our next workshops.



### TALKIN' ABOUT THE CAR WASH

While the car wash may be the cool place to be this summer, keeping those rags and machines hummin' can result in a pollutant loading to your collection system. Suspended solids, oil and grease, and detergents are pollutants that can be discharged to the sanitary system. Many car washes are considered "closed loop" and recycle the cleansing water, however the grey water eventually becomes too soiled to reuse 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 themselves. To get a copy of the BMP go to FDEP's website at:

http://www.dep.state.fl.us/pollutionprevention/initiatives <a href="http://www.dep.state.fl.us/pollutionprevention/initiatives">http://www.dep.state.fl.us/pollutionprevention/initiatives</a>

Hey get your car washed today.
Fill up and you don't have to pay.
At the car wash.
Talkin' about the car wash yeah!