PRETREATINENT Communication October 1999, Volume 4 Issue 2

PUBLISHED BY THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Coordinator's Desl

If you tried to reach me during July or August, you would have gotten my voice mail that said something like, "You have reached my voice mail, I'll be out of the office until September 1. If you need to speak to someone about pretreatment, press 0, and ask for Gary Millington." No, fortunately I was not out sick or recuperating from any medical procedure. On the contrary, I was having the time of my life.

Most of you know that I ride motorcycles and have done so all my driving years. A long time ago I decided that I wanted to ride a motorcycle across the United States and see as much as I could in whatever time I had. Well, this year I was fortunate enough to have accumulated enough leave time and "squirreled" away enough money to take two months off work and pursue my dream.



Time to leave Tallahassee ...

My wife and I traveled in 25 states over 53 days and logged 9,757 miles on our Harley-Davidson@ motorcycle. We saw many awesome

(See Coordinator, page 5)

Beginning of the Pipe: P2 in Industrial Pretreatment

by Randall S. Greer City of Melbourne, Florida

The National Pretreatment Program is a cooperative effort of federal, state, and local regulatory environmental agencies established to protect water quality. As indicated by the name, the historical emphasis of pretreatment programs has been the treatment of industrial wastewater to remove or reduce pollutants to meet established discharge limits. Unfortunately, focusing on the final quality of the process wastestream (i.e. the end of the pipe) without consideration of the treatment byproducts can produce hazardous waste and/or unwanted air emissions. The problem with generating a hazardous waste is the cradle to grave

responsibility that goes along with it. Regardless of whether the transport company or disposal site is licensed and approved for hazardous waste, transporting hazardous waste somewhere else does not relieve the generator of responsibility. If the hazardous waste is not properly managed at the new site, it can and will continue to cause problems. The generator of the hazardous waste is



responsible for the required clean up and any damages involved as a result of the generated waste wherever it may end up.

A case in point involves a company located in Melbourne, Florida. A metal finisher regulated under the pretreatment program generated a process wastestream containing chromium from the chromate conversion of aluminum parts. Chemical precipitation provided an effective means to meet the discharge limits on the chromium that could be discharged to the sewer system, but resulted in the generation of hazardous waste sludge. Although the sludge was properly manifested and transported to a hazardous waste management facility, the company was one of

Pretreatment Communicator

hundreds that became liable for a contaminated site due to the cradle to grave responsibility that goes along with hazardous waste generation.

As a result of the problems that developed from a waste product no longer under their immediate control, the metal finishing company decided to implement a long-range program to adopt more environmentally friendly production methods. In 1997, the company's pollution prevention (P2) program achieved the major goal of eliminating the chromate conversion process, and the facility is no longer classified as a categorical user or a hazardous waste generator. The facility continues to produce quality products, but no longer has the potential to impact the wastewater facility (WWF) or the environment.

Although pretreatment programs are water quality programs responsible for enforcing pretreatment standards and requirements, the overall environmental impact from all aspects of manufacturing should be considered when evaluating process wastestreams. Local pretreatment programs can better serve the community and the industrial users by promoting pollution prevention as the means of meeting the standards while reducing environmental

liabilities and saving money. In communities lacking pollution prevention programs, pretreatment programs are often the only local source of information on cost-effective, environmentally friendly, alternatives for industrial users.

Pollution prevention should be recognized as a valuable tool and become a component of every Industrial Pretreatment Program because both business and the control authority benefit from P2.

P2 can be promoted within the pretreatment program as follows:

Inspections

Part of the normal routine of implementing a pretreatment program is conducting inspections of industrial facilities. Preparing for an inspection involves obtaining background information such as water consumption and manufacturing processes. After determining what type of general and industry specific P2 material would be suitable, the appropriate information can be downloaded from the Internet or obtained from other sources, for delivery to the industrial user. As inspections are conducted, manufacturing processes can be evaluated with potential P2 strategies brought to the attention of the industrial user. At the conclusion of the inspections, the industrial users are provided with the P2 material brought for the

inspection, with an offer to provide additional information.



Presentations

Pretreatment programs should focus on educating the community about pretreatment standards and requirements as a means of preventing discharge violations due to ignorance of applicable limits. P2 information can easily be included in the presentations to educate the industrial users how to decrease operating/ production costs while reducing liability. The community as a whole can be educated through the use of staffed displays at regularly scheduled events at shopping malls, auditoriums, schools, etc. Information for the business community can be disseminated through presentations at the Chamber of Commerce, Manufacturers Association meetings, etc.

Internet

The internet is a fantastic tool for providing information to the community. Pretreatment programs can develop home pages with information on pretreatment standards and requirements, some general P2 strategies, and possible enforcement initiatives for violations. Links to P2 sites are highly recommended, there is no need to duplicate what is already available on the net.

Recognition Program An added incentive for businesses to implement P2 strategies is the development of an award program to recognize those businesses that have made significant strides in P2. Annual awards could be presented during Earth Week or Pollution Prevention Week. Promotion of the award can be through the web page, newspaper, radio, local business publications, during inspections, and any presentations held throughout the year.



Significant User Permits Wastewater discharge permits can include language promoting P2, encouraging users to investigate possible P2 strategies. Permits could also require P2 implementation for those facilities with chronic violations in the previous reporting year.

Incorporating P2 into pretreatment programs benefits the control

authority as follows:

Decrease in the potential for impact to WWF

If companies are not using acids, solvents, or heavy metals in the manufacturing process, the possibility of spills or illegal discharges is eliminated. With the possibility of slug loads diminishing, you are less likely to experience treatment upsets or pass through.

A lift station immediately downstream of a metal finisher used to have problems with carbonate scale build up. The deposits accumulated in the piping as well as on the lift station walls and submersible pumps. The scale build up on the submersible pumps acted as insulation, causing overheating and failure of the pumps. When the facility substituted painting for chromate conversion, the associated alkaline cleaning was eliminated. The elimination of the alkaline cleaning process resulted in an elimination of the scale build up in the lift station from the precipitation of carbonates.

Increase in the quality of treated effluent and residuals Product substitution and the elimination and/or reduction of metal bearing wastestreams produce a decrease in the headworks loading of the treatment facilities. Heavy metals typically concentrate in the residuals; thus a reduction in the total pounds of metals entering the treatment facility produces higher quality residuals for land applications.

An excellent example is the reduction of copper in the treatment plant residuals after a circuitboard manufacturer implemented P2 strategies.

<u>Reduction in operating costs</u> The control authority is required to sample and inspect all significant industrial users within its jurisdiction. If P2 initiatives can enable SIUs to be reclassified as nonsignificant, the requirement to monitor and the associated costs are eliminated.



During the last fourteen years, three Melbourne companies have eliminated metal finishing operations. Since the City does not impose fees upon industrial users for sampling and analyses to verify compliance, the reduction in inspections and sampling events is a direct saving.

Development of a better working rapport with the industrial and commercial community

Working with the industrial sector to assist obtaining the necessary information to reduce production cost and decrease liability provides a positive image for the control authority. Although regulatory in nature, pretreatment programs do not have to establish an adversarial relationship with local businesses. Noncompliance with pretreatment standards does require an enforcement response, but a pretreatment program is more effective when there is a good working rapport with industry. Prior to promoting P2, the City of Melbourne would inspect SIUs once a year and sample on a routine basis. Unless there was a violation. interaction with the industrial users was minimal, generating a feeling of dread when the City knocked on the door for an inspection. After incorporating P2 into the pretreatment program, contact with the industrial users became more frequent, with P2 material distributed during most visits. Inspections still focus on pretreatment requirements, but the emphasis is now on P2 strategies instead of waste treatment to meet applicable effluent limits with the users appreciative of any assistance to reduce operating costs.

The overall benefits that industrial users can achieve through pollution prevention include reduced production costs, decreased liability, a safer work environment, and a positive environmental image.



In addition to benefiting the control authority, incorporating P2 into pretreatment programs benefits the industrial user as follows:

- In the absence of a local P2 program, the pretreatment program may be the only local source of information.
- Pretreatment personnel routinely inspect industrial facilities and are familiar with manufacturing processes.

Advanced Quick Circuits, L. P. (AQC) located in Melbourne, Florida, is an excellent example of how industry has benefited from implementing P2.

In 1989, AQC was discharging an average of 350,000 to 400,000 gallons per day (gpd) of process wastewater to the City's WWF and was experiencing difficulty maintaining compliance with effluent limits. Due to a lack of treatment capacity and problems maintaining discharge limits, daily production shutdowns were common. The excessive copper loading at the WWF resulted in several plant upsets and an elevated copper concentration in the residuals. AQC took a proactive approach to meeting the challenge of reducing the copper and hydraulic loading

by implementing a long range P2 program. Utilizing counter current rinsing, flow restrictors, ion-exchange technology, and reuse of reverse osmosis reject water, AQC has reduced the wastestream by 50%.

Today, AQC has an additional production facility on line, maintains compliance with discharge limits, and saves over 2 million dollars per year in operating costs as a result of P2 implementation. Specific information on the success story can be found at the FDEP P2 web site.

Enforcing the pretreatment standards is still a priority, but educating companies to implement P2 to achieve compliance benefits industrial users and the community. Those pretreatment programs operating within the jurisdiction of local P2 programs can scale down their P2 efforts and develop a partnership with the P2 program to provide guidance and direction to the regulated industries. For those pretreatment programs operating in areas without P2 programs, it is more important to step up to the plate and bring P2 to the businesses. v



Pretreatment Communicator

Coordinator... (Continued from page 1)

sights, and experienced the smells and feelings that can only be sensed via motorcycle. The weather was almost perfect most of the time. One word of caution though, if you plan to visit Yellowstone National Park on a motorcycle, I would advise you to wait a few years until all the road work is completed (unless you're on a dirt bike). The major roads in and out of Yellowstone are totally under construction. I mean that there is no road at all in some places at this time. It was a very scary trip through a major attraction. In fact, I don't remember seeing much, other than the roads!

I would like to thank Gary Millington and the rest of the pretreatment staff for covering for me. I know my absence put an additional workload on the Tallahassee folks. I appreciate their cooperation. I hope you all were able to get all your



Nice park ... bad roads!

questions answered adequately. I did have DEP's laptop with me, so I could occasionally communicate via email with my people as well as the programs. I did not see anything that was not addressed or that needs additional attention. Also, I would like to thank Divina for the excellent job she did on her first issue of the *Communicator*.

While I was away it looks like a couple of pretreatment program related issues have surfaced at the national level. By now I think that everyone knows that the industrial laundries have been eliminated from the categorical classification. This issue was mentioned in the last issue of the *Communicator* and is good news for many programs. Please remember that although these IUs are not considered "categorical", they can, and probably should, be permitted as "significant."

The other major item was the publication of the long awaited Pretreatment Program Streamlining Regulations. These proposed revisions were published in the July 22 Federal Register. I believe many of the proposed changes will have a positive effect on the approved pretreatment programs, but I don't agree with all the changes. We have discussed the proposed streamlining many times in the past and you have shared your concerns about the proposed regulations too. Now is your chance to officially comment to EPA about the impact these revisions will have on your program or industrial users. Please thoroughly review these proposed changes, as they will directly impact how you do business. Take the time to send your comments to EPA. Please note that the comment period has already been extended from the initial date of September 20 to a new date of November 19. There is plenty of time to draft a response. The more programs that EPA hears from, the better the chances of having an effective regulation.

Well, its good to be back in Florida where we have the greatest pretreatment programs in the United States. Feel free to contact me with any questions, or if you would like to set up a time to see my vacation pictures. The pictures shouldn't take more than a few hours! v

Robert E. Heilman

Pretreatment Communicator

Technical Quiz



Hi Folks! Technical Quiz is a new feature in our forum intended to exercise our aging minds. It contains miscellaneous questions in general, support systems, unit operation/process control and technical supervision/management, etc. So put on your thinking hard hats, grab a pencil and get ready to take the quiz. Bob says he'll review your responses during your program audit.

- 1. Hydrogen sulfide gas smells like
 - A. Dead fish
 - B. Fuel gas
 - C. Rotten cabbage
 - D. Rotten eggs
- 2. Gasoline and volatile solvents are objectionable when present in a sewer because
 - A. They produce an explosion hazard.
 - B. They tend to cause the solids to vaporize.
 - C. They will coagulate floatables and cause stoppages.
 - D. None of the above.
- 3. The formula for calculating the volume of a wet well is
 - A. $V = L \times W \times C$.
 - $B. \quad V = W x A x P.$
 - $C. \quad V = W \ x \ L \ x \ D.$
 - $D. \quad V = W x H x D.$
- 4. Biological activity in long, sluggish-flow, flat-grade sewer lines will likely cause
 - A. Concrete and metal corrosion.
 - B. Oxygen deficiency in the air in manholes, sewers or wet wells.
 - C. Toxic gas production.
 - D. All of the above.
- 5. A task performed by a collection system operator is
 - A. Cleaning local treatment plants.
 - B. Maintaining collection system equipment.
 - C. Making water connections.
 - D. None of the above.



- 6. The amount of oxygen that may become dissolved in any given amount of water is most related to
 - A. Hardness.
 - B. Total dissolved solids.
 - C. Temperature.
 - D. Turbidity.
- 7. The gas most commonly associated with septic wastewater is
 - A. Carbon dioxide.
 - B. Carbon monoxide.
 - C. Hydrogen sulfide.
 - D. Methane.
- 8. The amount of hydrogen sulfide produced in a sewer is determined by
 - A. BOD concentration.
 - B. Dissolved oxygen concentration.
 - C. pH.
 - D. Suspended solids concentration.



- 9. Four conditions are necessary to create an explosion. Three of these conditions are combustible gas, adequate oxygen and sufficient heat. What is the fourth?
 - A. Constant supply of combustible gas.
 - B. Enclosed area that will hold the gases.
 - C. Proper mixing of gas and oxygen.
 - D. None of the above.
- 10. A flow of 650 gpm would be ____ mgd.
 - A. 0.472
 - B. 0.936
 - C. 1.714
 - D. 1.923
- 11. The temperature versus dissolved oxygen (DO) relationship for wastewater is such that the
 - A. Higher the temperature, the higher the DO saturation level.
 - B. Higher the temperature, the lower the DO saturation level.
 - C. Lower the temperature, the lower the DO saturation level.
 - D. None of the above.
- 12. The gas most commonly associated with fresh wastewater is
 - A. Carbon dioxide.
 - B. Carbon monoxide.
 - C. Hydrogen sulfide.
 - D. Oxygen.

- 13. Sources of harmful radioactive isotopes in wastewater collection systems include
 - A. Hospitals.
 - B. Research labs.
 - C. Tracer studies.
 - D. All of the above.
- 14. The presence of hydrogen sulfide in a collection system is usually caused by the
 - A. Bacterial oxidation of sulfur in the presence of dissolved oxygen.
 - B. Bacterial reduction of methane in the absence of dissolved oxygen.
 - C. Bacterial reduction of methane in the presence of dissolved oxygen.
 - D. Bacterial reduction of sulfate compounds in the absence of dissolved oxygen.
- 15. Which of the following rules apply to the operation of gas or electric welding equipment?
 - A. Adequate fire protection must be provided.
 - B. Operators must be thoroughly trained.
 - C. Protection of other personnel must be provided and used.
 - D. All of the above.

It-D' IS-D. J-C' 8-C' 6-C' 10-B' 11-B' 15-D' 13-D' WusMets: 1-D' 5-Y' 3-C' t-D' 2-B' 6-C'



CONGRATULATIONS!



Mr. Erik L. Melear of the City of Orlando is the recipient of the 1999 Robert E. Heilman Pretreatment Award. Erik has demonstrated an outstanding interest in improving the industrial pretreatment programs in the State of Florida. He was instrumental in assisting and organizing the Florida Pretreatment Coordinators Training Workshop in Gainesville last February. He arranged the hotel facilities, handled all the workshop notice mailings and faxing, kept track of the registration forms, arranged for the Continuing Education Units, and handled all the finances for the workshop. We could not have had such a successful training workshop without Erik's involvement.

Thank you Erik for being dedicated to the Florida Pretreatment Program!

Pretreatment Program ActiVities

Contact the Tallahassee DEP pretreatment program for more information on any of the following:

q The Tallahassee DEP pretreatment program staff met with DEP attorneys to discuss statutory requirements for implementation of multijurisdictional agreements needed for pretreatment programs. The Office of General Counsel has the opinion that cities and counties have legal authority to exercise and transfer rights of enforcement under Florida Statutes. In certain cases, the statutory authority negates the need for a multijurisdictional agreement.



q The City of Hollywood presented a paper entitled "The City of Hollywood's Experience with Developing a Pretreatment Program" at the 1999 Florida Water Resources Conference. The paper emphasizes the importance of using near-clean sampling techniques.

q Managing grease problems and elimination techniques through ordinances were discussed at the Florida Pretreatment Coordinators Workshop in Casselberry in June.

q A literature study was conducted on acceptable levels of molybdenum in reclaimed water principally used for turf grass and landscaping irrigation.

If you have any information that you think might be helpful or interesting for other pretreatment programs, let us know and we'll put the it in the next issue of the *Pretreatment Communicator*!

Gary taught a class on multijurisdictional agreements at the Florida Water Pollution Control Operators Association A Class for pretreatment voluntary certification program ...

Bob and Divina went to South Carolina to present their Local Limits paper at the 1999 Specialty Conference Series for Pretreatment Programs and Industrial Users ...

Sal represented the Pretreatment Program to accept the DEP Water Resource Management Division Work Unit Award ...

Welcome Aboard

After a lot of hard work and effort, pretreatment programs have recently been approved for the City of Ocala and the City of Deland.



We now have fifty-three approved pretreatment programs in Florida ...

Reminders ...

The City of Melbourne will be hosting the next statewide Industrial Pretreatment Workshop on October 14, 1999, at the Melbourne Auditorium, 625 E Hibiscus Boulevard, Melbourne, FL, 32901.

The workshop will begin at

8:30 a.m. and end at 3:30 p.m.

Contact Randall Greer at (407) 255-4619 or ipp@iu.net.

Directions

From I-95: Exit #71, east on US-192 to Babcock Street (about 5 1/2 miles), left on Babcock Street, Right on Hibiscus Blvd. Auditorium is on the right side of the road.

From US-1: Turn west on Hibiscus Blvd. Auditorium is on the south side of Hibiscus Blvd.

Agenda

- 8:30 Tour registration/confirmation, coffee and bagels
- 8:50 Introduction and general notices
- 9:00 FDEP update
- 9:30 Beginning of the Pipe: Pollution Prevention in Pretreatment
- 10:00 Depart for tour at Advanced Quick Circuits (20 people maximum)

or ...

- 10:00 Round table discussion, open forum 11:30 Finish AQC tour, break for lunch
 - :30 Finish AQC tour, break for lunch
- 1:00 Sanitary sewer evaluation studies and inflow & infiltration programs
 2:00 Round table discussion or breakout sessions: painless local limit allocation, groundwater remediation sites, and regulating hauled waste

or ...

- 2:00 Depart for tour at Advanced Quick Circuits (20 people maximum)
- 3:30 Finish AQC tour
- 3:30 Wrap up, discuss next meeting date, location, and potential agenda

Please RSVP if you are interested in the tour of Advanced Quick Circuits. Each tour will be limited to twenty people.

Accommodations

Workshop attendees can obtain a special rate at the Holiday Inn Oceanfront. Contact the Holiday Inn at (407) 777-4100 and mention that you will be attending the Industrial Pretreatment Workshop held by the City of Melbourne.

DEP Annual Reuse Reports Due January 1, 2000

Annual reports are required by Rule 62-610.870(3), F.A.C.

Who needs to submit an annual reuse report? All permittees having reuse projects if the domestic wastewater treatment plant has a capacity of 0.1 mgd or more.

What is considered reuse? Reuse projects are defined in Rule 62-610.810(2), F.A.C. The following types of projects are reuse:

Public access reuse systems meeting Part III requirements of Chapter 62-610, F.A.C. (irrigation of golf courses, parks, residential properties, other landscaped areas and urban reuse activities).

Agricultural irrigation including irrigation of edible food crops as described in Part III of Chapter 62-610, F.A.C.

Spray irrigation systems irrigating feed and fodder crops, grasslands, or pastures as described in Part II of Chapter 62-610, F.A.C.

Rapid-infiltration basins (perc ponds) and absorption fields meeting Part IV requirements of Chapter 62-610, F.A.C.

Projects involving wetlands creation, restoration, or enhancement using reclaimed water.

Groundwater recharge (injection to potable water) and **indirect potable reuse** projects as described in Part V of Chapter 62-610, F.A.C.

Industrial uses of reclaimed water including use at the wastewater treatment facility as described in Part VII of Chapter 62-610, F.A.C.

What time period is covered by the next report? October 1, 1998 - September 30, 1999

What form do I submit? Use DEP Form 62-610.300(4)(a)2. Note: This form was revised in 1999. It is available on the internet at www.dep.state.fl.us/water/wf/dom/reuse/legal.htm

What will the data be used for? To maintain an updated inventory of reuse in Florida. This type of information is useful to facilities wanting to implement reuse. This data is also used to track the effectiveness of Florida's reuse program.

For more information: Call the appropriate DEP district office or David York at (850) 488-4524.



Regulatory Upc

October 1999

q The Environmental Protection Agency (EPA) published a final rule on May 14, 1999, that approves n-hexene as a solvent in laboratory methods that test for the presence of oil and grease and total petroleum hydrocarbons in wastewater discharges. This will reduce the amount of chlorofluorocarbons released to the atmosphere.

Visit the following website: http://www.epa.gov/ostwater/ Methods/oil.html

q In a final rule published on September 21, 1998 (63 FR 50388), EPA established final effluent limitations and standards for the pharmaceutical manufacturing point source category for the control of wastewater pollutants. The final rule omitted a clarifying abbreviation and contained four incorrect subsections. EPA corrected these errors, and the corrections became effective on September 2, 1999.

For more information, contact Dr. Frank H. Hund, USEPA, Office of Water, Engineering and Analysis Division, (202) 260-7182. Website: http://www.epa.gov/ reg3wapd/3wp24/preweb/ pharmrev.txt

q On September 3, 1999, the final rule of Title 40 of the Code of Federal Regulation Parts 403 and 503, Standards for the Use and Disposal of Sewage Sludge, became effective. The general pretreatment regulation for existing and new sources of pollution was amended by adding a concentration for total chromium in land-applied sewage sludge to the list of pollutants that are eligible for a removal credit issued by a wastewater treatment works treating domestic sewage.

Visit the following website: http://www.epa.gov/fedrgstr/EPA-WATER/1999/August/Day-04/w18604.htm

Streamlining the General Pretreatment Regulations for Existing and New Sources of Pollution - 40 CFR Part 403

On July 22, 1999, EPA proposed to revise several provisions of the general pretreatment regulations that address restrictions on and oversight of industrial users who introduce pollutants into publicly owned treatment works (POTW). EPA also proposed changes to certain program requirements to be consistent with National Pollutant Discharge Elimination System requirements. The proposals would reduce the regulatory burden on both industrial users and state and POTW control authorities without affecting the environment.

Written comments on the proposed rule must be submitted on or before **November 19, 1999.** For more information, contact Jeffrey B. Smith, USEPA, Office of Wastewater Management, (202) 260-5586. Website: http://www.epa.gov/owmitnet/permits/pretreat/waisgate.pdf

Overview of What is Being Proposed

a Specific Prohibition Regarding pH - POTWs could accept wastewater having a pH less than 5 from industrial users that continuously monitor their discharges if the discharges are of short duration and the POTWs can demonstrate that this will not damage their collection system.

a Equivalent Mass Limits - Control authorities could set a mass limit in lieu of a concentration limit for categorical standards for certain regulated pollutants if the industrial facility demonstrates it uses best available technology economically achievable (BAT) or equivalent and practices water conservation.

a Equivalent Concentration Limits for Flow Based Standards - For those facilities subject to effluent guidelines that prescribe a mass limit based upon flow, but have highly variable flow, Control Authorities could set a concentration-based limit for the regulated pollutants.

a Oversight of Significant Industrial Users - Certain *non-significant* categorical industrial users (CIUs) would be exempt from the definition of significant industrial users (SIUs). *Non-significant* CIUs would be defined as facilities that never discharge concentrated wastes and discharge less than one hundred gallons per day of process wastewater, or are subject only to certification requirements after having met baseline monitoring report requirements.

a Categorical Industrial Users Monitoring - A *non-significant* CIU would be exempt from certain inspection and sampling requirements, but would have to annually certify that it was in compliance with discharge limitations and low flow rates.

a Slug Control Plans - Control Authorities would have flexibility to set their own schedules for reviewing the need for a slug control plan as part of their oversight and inspection of industrial users rather than being tied to the current mandatory two year review cycle. Requirements for slug control plans, where necessary, would be included in SIU permits.

a Sampling for Pollutants Not Present - Control Authorities could wave sampling for pollutants that have been determined to not be present in concentrations greater than ambient background levels. The industrial user would have to periodically certify that the pollutant(s) are present at or below background levels only.

next page ...



a Use of Grab and Composite Samples - Control Authorities and industrial users would have additional flexibility to use grab or manually composited samples for certain parameters that are unaffected by the composting process. Control Authorities would have additional latitude regarding the number of samples required for certain monitoring reports and whether to allow time-proportional sampling in lieu of flow-proportional sampling procedures.

a Removal Credits - Industrial users upstream of combined sewer overflow or sanitary sewer overflow points would be ineligible for removal credits unless the discharges are treated because of the possibility of untreated pollutants entering a river or stream during a storm event. The preamble also discusses existing procedures for petitioning the Agency to establish a part 503 sewage sludge standard which must be in place before a removal credit can be requested.

a Electronic Filing and Storage of Reports - To reduce the paperwork burden, the Agency is currently evaluating options for electronic reporting and storage of records. The Agency will publish a separate, proposed rulemaking to allow electronic reporting in the near future.

a General Permits - General permits could be used to regulate significant industrial users if these facilities have the same or substantially similar type of industrial processes, discharge the same type of wastes and are covered by the same concentration-based standards or best management practices.

a Best Management Practices - Best management practices developed by POTWs could serve as local limits and be enforceable as local permit requirements.

a Modification of Significant Noncompliance Criteria - Significant Noncompliance Criteria (SNC) would only be required to apply to significant industrial users. SNC criteria would be changed to address any violations of pretreatment standards or requirements rather than just violations of daily maximum or longer-term average limits. The SNC list could be published in any paper of general circulation that provides meaningful public notice. Comments are being sought on other changes recommended by stakeholders and OMB. v

Please ad	d me to	If you would like to receive the <i>Pretreatment Communicator</i> ,
your maili	ng list.	
		Mail this form to:
name		Pretreatment Communicator
hanc		Domestic Wastewater Section
title		Florida Department of
company		Environmental Protection
company		2600 Blair Stone Road, MS 3540
address		Tananassee, FL 32399-2400
		Fax this form to:
city state zin		Divina M. Ruiz
		Pretreatment Communicator
phone	fax	(850) 921-6385
comments or suggestions	:	
		Or, E-mail your information to:
		divina.m.ruiz@dep.state.fl.us
		Thanks for your interest!

PRETREATMENT COMMUNICATOR DEPENDENT HE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION The Pretreatment Communicator is a quarterly publication of the Pretreatment	Program of the Florida Department of Environmental Protection. The Pretreatment Communicator encourages participation from its readers and any other individuals interested in pretreatment in the State of Florida. Please submit your letters, information, or articles to Pretreatment Communicator, Domestic Wastewater Section, Florida Department of Environmental Protection, 2600 Blair Stone Road MS 3540, Tallahassee, Florida 32399-2400. The Pretreatment Communicator reserves full editorial rights to all submissions.	Anyone with questions or comments about this newsletter or wanting to be included on the mailing list should contact the pretreatment program staff at the above address or at (850) 488-4524. 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.	Pretreatment Coordinator: Robert E. Heilman Pretreatment Engineers: Gary A. Millington Salvador A. Resurreccion Divina M. Ruiz	Please recycle or pass this newsletter on to other pretreatment staff.	
FLORIDA Pretreatment Commun Domestic Wastewater 2600 Blair Stone Road Tallahassee, Florida 32	icator Section 1, MS 3540 2399-2400				

