

# PRETREATMENTCommunicator

APRIL 2003, VOLUME 8 ISSUE 2

PUBLISHED BY THE FLORIDA INDUSTRIAL PRETREATMENT ASSOCIATION

## COORDINATOR'S DESK



By Bob Heilman

If you missed the DEP/FIPA local limit workshop on February 7, you missed an excellent training opportunity (if I do say so myself!).

We had eighty-four registered attendees; representing 43 approved pretreatment programs or public utilities. In addition, there were approximately ten DEP employees who either participated in the workshop or observed the presentations.

This workshop was organized a little different than in the past. Normally we break at noon and eat lunch on our own. However, due to the amount of information to present and the need to discuss FIPA business, it was decided to have a catered lunch for a small fee. The feedback from this minor change in procedures was very positive and proved to be cost-effective. We think FIPA should consider this option again in the future.

There were several other positive comments we received about the workshop and I'd like to share these with you. Many of you commented on the quality and preparedness of the speakers. I can tell you from experience that a significant amount of time went into preparing for this workshop and it was obvious by your comments that it was worth it. The same is true for the handout material and the quality of the PowerPoint presentations.

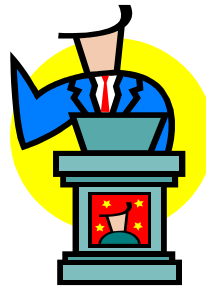
This workshop had a lot of technical information to disseminate. Unfortunately, there was only enough time to hit the high points of some of the topics. As with any workshop, only so much can be said about a topic and the attendee must augment that information with his or her own knowledge, experience, and "homework." Overall, we feel that the workshop presented enough basic information to be able to develop a defensible set of protective local limits.

The most often voiced complaint was the size of the room. It is true that there was limited space for each attendee. However, because we decided to have everyone seated at a table to work and eat comfortably, we were forced to squeeze folks a little close together than we like. Future workshops in Tallahassee will probably be held a location other than the DEP offices and should result in more comfortable accommodations.

One timely issue discussed at the workshop was an alternative approach to re-evaluating local limits. Chris Jensen discussed

(see **Coordinator**, page 6)

## FLORIDA INDUSTRIAL PRETREATMENT ASSOCIATION



### A message from the President

By Brian J. Dean

The meeting in Tallahassee was a great success. The attendance was outstanding and the comments of the attendees were very good. Robert Heilman and staff did a tremendous job. Local limits are a bit overwhelming at first and the presentations should have helped considerably. If you that are still unsure of how to go about a local limits evaluation should contact Bob, one of his staff, or call on your fellow FIPA members for assistance. The FIPA should be an organization of cooperation and assistance.

Our web site should be up and running soon. Walt Smyser is the webmaster for the FWPOCA and has put together a very nice logo, letterhead, and is working on the pages for the web site. If any of you want to see something in particular on the web site, let me know.

The "B" and "A" IPP classes at the FWPCOA State Short School in March were cancelled due to low registration. The next school will be in Fort Pierce in August. A couple of changes were made to the IPP voluntary certification program at the last FWPCOA Director's Meeting. The experience requirements were changed to two years for the "B" school and three years for the "A" school. This decision was reached by the IPP subcommittee after much discussion. The rationale is that many of us in the pretreatment business were brought into programs with little experience and had to learn the trade quickly. By the time one has five years experience, all aspects of the program have been covered and the training comes too late.

Another change allows people to take certification exams prior to having the time required to be certified. Those who need additional time will receive a form to send to the FWPOCA training office once the experience requirement is met. This is great news for people that want to get the training now so they can put it to work. The

(see **President**, page 5)

## New FIPA Logo & Website

The Florida Industrial Pretreatment Association is proud to unveil the official FIPA logo. As many of you are aware, FIPA has been seeking an official association logo over the past year. The selected logo was designed by Walt Smyser, the FWPCOA and new FIPA webmaster. Walt is currently employed by the city of Hollywood as a senior engineer and manages the Technical Services work group in the Engineering Support Services Division. He is a dabbler in computer programming and graphic arts since the 1970s and has created presentations and graphics for decades. Walt designed and maintains our new website at [fipaonline.org](http://fipaonline.org). The website is in its infancy stage and we are encouraging our members to contact us with content ideas. Check out the website today and let us know what you think!

Although it does not show up here, the logo is blue.



## The Inside Grease Trap...The Final Frontier

By: Lori Moreda, Hillsborough County Water Department

Star date 032003, the USS Municipal Sewer is heading for unknown and uncharted territory. Destination: the abyss of the "inside grease trap". (Vintage Star Trek soundtrack please)...

As Industrial Pretreatment professionals we are required to know a lot about a lot of things, and with that, we cannot be proficient in every single facet of our jobs. To that end, the Hillsborough County Water Department, has broken the grease trap inspections into two (2) distinct areas so that we can each be "experts" in our own field.

In Hillsborough County Rodney Hyde, and myself, inspect over 1200 sites every 90 days. We divide the inspections so that Rodney performs the majority of inspections from a dedicated "grease" vehicle. He inspects all outside (large) type grease interceptors, oil and water separators, and lint traps. I inspect the small, usually located inside, grease traps which does not require a dedicated vehicle.

When inspecting the under-the-sink type traps you'll need a variety of small hand tools and a 5 gallon bucket. In the bucket I keep a container of baby wipes, an assortment of screw drivers, allen wrenches, pliers, rubber gloves, paper towels, and spray air freshener.

When inspecting these grease traps, a lot can be wrong that the untrained eye cannot see. Simply, the manufacturer designed these traps to work efficiently when installed properly and maintained correctly. We've found

these traps installed backwards, without venting, with out flow control, and most often without the internal baffles or with the internal parts misaligned (installed wrong). And yes, the single most common element that is missing is the gasket. I carry an assortment of photographs with me to illustrate the internal workings of the trap when I find a problem. When one part is missing or damaged, it adversely affects the performance of the trap. As simple as a vent with flow control may seem, it really does affect the performance of a trap. It could mean the difference between cleaning it daily or cleaning it weekly. And the gasket often gets removed by some over zealous kitchen worker who wants to "really" clean the grease trap. Then the grease trap leaks because it's metal to metal - just like a car's valve covers - it needs a gasket! Then the kitchen staff over tighten the nuts, bolts, or allen nut causing even more damage.

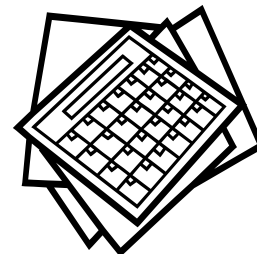
When you find a trap (usually) a Rockford, with water flowing over the internal parts, it's because the holes in the baffles are blocked. People think that just removing the top floating debris is sufficient cleaning. Not in these little traps. They have small holes and openings through out their internal workings and when those are blocked, the water takes the least path of resistance and so does the grease!

Watch for grease and rust bubbles on the lid of the trap (inside).

(see **GREASE**, page 5)

## Calendar of Events

April 14-16	: E.P.A./W.E.F. Pretreatment Training Course in Seattle, Washington
April 29-30	:Field Sampling Training in Ft. Pierce, Fl.
May 4-7	:Florida Water Resources Conference in Tampa, Fl.
May 6	:FIPA Workshop at the Florida Water Resource Conference
June 16-20	:E.P.A./W.E.F. Pretreatment Training Course in Philadelphia, Pa.
June 27	:FIPA Coordinator's Meeting in Coconut Creek, Fl.
August 4-7	:E.P.A./W.E.F. Pretreatment Training Course in Chicago, Illinois
August 11-15	:FW&PCOA Fall Short School in Ft. Pierce, Fl.



### ***FIPA Workshop \**** **Fats, Oil and Grease Management**

**When: May 6, 2003**

**Where: Tampa, Florida**

**Time: 8 a.m until 12 p.m.**

Speakers and Topics are as follows:

Bob Heilman	- State Perspective
John Parnell	- F.O.G. Program Organization
Lori Moreda	- Facility Inspection and Sampling
Brian Dean	- F.O.G. Analysis
Chuck Knotts	- Grease Interceptor / Trap Design
Chuck Watson	- Grease Pumper's Perspective

\*There is a Registration fee of \$175.00 which includes access to the Florida Water Resource Conference the day of the workshop.

For more information contact John Parnell at (727)892-5694 or e-mail [John.Parnell@stpete.org](mailto:John.Parnell@stpete.org)

### **Mark your calendar for the next FIPA Coordinator's Meeting**

**Friday June 27th, 2003**

at the

Fern Forest County Park / Nature Center  
201 Lyons Road South  
Coconut Creek, Florida 33063

Topics will include: Sampling, Analysis, Inspections  
and Industrial Processes.

There will be a registration fee of \$15.00 for FIPA members and \$20.00 for non-members which includes lunch. Registration payments (cash or check only!) are due the day of the meeting and will not be accepted prior to the workshop.

For more information contact your Southern Region Coordinator, Chris Cassidy.

**Coming in August or September, the Central Region is hosting a 2 day FIPA Coordinator's Meeting at Disney World in Orlando, Fl.**

This two day event will include a tour of Reedy Creek Utilities on Thursday and a workshop on Friday.

Discount room rates will be available.

Look for more information in the July Edition of the Pretreatment Communicator or contact FIPA Vice President Andy Johnson via e-mail at [andy.johnson@cityoforlando.net](mailto:andy.johnson@cityoforlando.net).

### **Your FIPA officers contact information:**

President: Brian Dean.....[president@fipaonline.org](mailto:president@fipaonline.org)

Vice President: Andy Johnson .....[vice-pres@fipaonline.org](mailto:vice-pres@fipaonline.org)

Treasurer: John Parnell.....[treasurer@fipaonline.org](mailto:treasurer@fipaonline.org)

Secretary : Cheryl Staley-Archer.....[secretary@fipaonline.org](mailto:secretary@fipaonline.org)

Northern Region: Fred Williams.....[north-coord@fipaonline.org](mailto:north-coord@fipaonline.org)

Central Region: Paul Salerno.....[central-coord@fipaonline.org](mailto:central-coord@fipaonline.org)

Southern Region: Chris Cassidy.....[south-coord@fipaonline.org](mailto:south-coord@fipaonline.org)

Past President: John Parnell .....[past-pres@fipaonline.org](mailto:past-pres@fipaonline.org)

**ROBERT E. HEILMAN AWARD****FLORIDA WATER & POLLUTION CONTROL OPERATORS ASSOCIATION  
INDUSTRIAL PRETREATMENT COMMITTEE**

To be awarded to an individual involved in an Industrial Pretreatment Program, who has demonstrated excellence of performance and shown dedication, commitment and an innovative approach to the Pretreatment Program in Florida, above and beyond the requirements of the regulations.

The application should be completed by a person, who has first hand knowledge of the activities of the nominee in the field of industrial pretreatment. Please answer the questions below and provide any additional information as necessary.

**PLEASE SEND NOMINATIONS BY MAY 31 TO:**

Mr. John Parnell  
c/o F.I.P.A.  
*205 Meadowcross Drive*  
Safety Harbor, Florida 34695

**I. Information about Nominee:**

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Agency: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
Telephone: \_\_\_\_\_  
E-mail Address: \_\_\_\_\_

II. Give a short description of the industrial pretreatment program that the nominee is involved with, including at least the size of the treatment plant(s) involved, # of SIUs, inception date, etc.

III. What evidence can be produced to demonstrate that this program has succeeded in achieving the goals of the pretreatment program?

IV. Give a short account of how the nominee has participated in obtaining these pretreatment goals.

V. Discuss any outstanding innovative ideas and procedures developed by the nominee that have significantly increased the efficiency of the pretreatment program, (leadership, teamwork, computer program, etc.).

VI. Describe any activities that the proposed individual has developed or participated in that can be considered over and above the requirements of the pretreatment regulations, (correspondence courses and professional development courses, etc.).

Nominated By: \_\_\_\_\_  
Title: \_\_\_\_\_  
Agency: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
Telephone: \_\_\_\_\_  
E-mail Address: \_\_\_\_\_

## Sampling Training Survey

At the February meeting many of the members mentioned an interest in attending the DEP Field Sampling Course. The course is two days long and includes several sampling techniques. If you are interested, e-mail the answers to these questions to me at [brianjdean@aol.com](mailto:brianjdean@aol.com). I will gather your comments and then try to set a session that will meet as many needs as possible. I would prefer if there is only one response from each interested program. If you are not interested, you don't need to respond.

1) What month would you be interested in attending the course?

August    September    October    November

January    February

2) Would you be able to travel to Tallahassee to attend the training?

Yes                      No

3) If you can't travel to Tallahassee where would you prefer to have the training? (I can't say if the FDEP crew will be able to travel)

Orlando    Clearwater    Fort Lauderdale    Gainesville

4) Would you be willing to host the training?

Yes                      No

5) What program are you from?

6) How many people from your program would like to attend?

Thank you for your reply,

Brian J. Dean

....**President** (continued from page 1)

only string is that you must get your "C" before you can take your "B" and your "B" before you can take your "A".

Also, the FWPCOA will now allow Regions to teach the "C" level courses at regional short schools. This means that you may not need to travel to take a course. Of course that could be a bad thing. I am not sure what regions will be offering the "C" course.

I am not sure about the next meeting. I know we are looking at going to Orlando in the late summer or early fall. The Florida Water resources Conference will be in Tampa in early May. I know Bob Heilman will be doing a presentation on local limits development and that John Parnell, Bob Heilman, and I will be conducting a workshop on Grease.

Until we meet again, I wish you well.

....**GREASE** (continued from page 2)

This is an indication of a couple of things: improper flow control or no flow control, no venting, and/or a blockage on the outlet side of the trap not allowing the water to leave as rapidly as it enters.

Watch for baffles being removed, put in backwards, and home-made parts. All of which will adversely affect the performance of the trap. Compounded with poor maintenance is a recipe for disaster.

Take the time to learn the different manufacturer's types of trap. Manufacturers will send you a catalogue just for the asking. The catalogue is chock full of cool pictures and diagrams. Make copies of the pictures and diagrams and take them with you on inspections. Educate your restaurateurs. They will appreciate it. No one really wants to pollute. They just have to understand why that one little tiny part is so important! Best of luck!



Are you interested in Pollution Prevention (P2) Activities in the state of Florida? Then check out [www.FLPPR.org](http://www.FLPPR.org). They are the only online, not-for-profit organization in Florida dedicated to P2.

## In The News...

EPA's Administrator signed a final rule to establish wastewater controls for the Metal Products and Machinery (MP&M) industry on February 14th, 2003. The rule establishes technology-based effluent limitations and new source performance standards for wastewater dischargers from new and existing facilities that manufacture, rebuild, or maintain finished metal products, parts, or machines. However, in response to comments from the regulated community and after further review of the rule, EPA decided *not* to incorporate the proposed pretreatment standards for indirect dischargers into the final rule. A pre-publication version is available at <http://www.epa.gov/waterscience/guide/mpm/rule.html>.

The EPA Office of Wastewater Management (OWM) has assembled a collection of useful information to help municipal officials educate citizens on important wastewater issues. EPA offers printed materials free of charge and a companion CD which includes information concerning essential EPA programs and funding sources. For more information visit the website at <http://cfpub.epa.gov/npdes/wastewatermonth.cfm>

In 1998, the EPA promulgated effluent limitations for the Pharmaceutical Manufacturing Point Source Category, 40 CFR Part 439. This regulation established effluent limitation guidelines, pretreatment standards and new source performance standards under the Clean Water Act for the pharmaceutical manufacturing industry. In response to comments from the regulated community and after further review of the rule, EPA decided to make several minor changes to certain provisions of the 1998 effluent limitations guidelines in March 2003. First, EPA is clarifying when those industrial users (classified as new sources under the earlier version) are subject to the new, more stringent standards of the 1998 regulation. Second, two subcategories unintentionally omitted a minimum concentration for the maximum monthly average BOD<sub>5</sub> limitation. EPA is correcting this omission by adding to Sections 439.22(a) and 439.42(a) the phrase: "..., except that no facility shall be required to attain a monthly average limitation for BOD<sub>5</sub> that is less than the equivalent of 45 mg/L." Third, EPA's pass-through analysis for the 1998 regulation used an incorrect value for Henry's Law constant of methyl Cellosolve (2-methoxyethanol). This caused the compound to be classified as a volatile organic compound (VOC), making it subject to the 1998 pretreatment standards. Using the correct Henry's Law value for methyl Cellosolve, the analysis indicates that it is not a VOC and that this compound will not pass-through wastewater treatment facilities. As a result, EPA is deleting methyl Cellosolve from the pretreatment standards of Sections 439.16, 439.17, 439.36 and 439.37, and from Appendix A, Table 2, "Surrogate Parameters for Indirect Dischargers." Finally, the Agency is making other non-substantive editorial and format changes such as removing redundancies, and adding definitions. These changes were published in the Federal Register (68 FR 12266) on March 13 and become effective on June 11, 2003, unless EPA receives adverse comments by May 12, 2003. If adverse comments are received, EPA will publish a "withdrawal" notice in the Federal Register and evaluate the comments received. For more details on the amendments, see [frwebgate1.access.gpo.gov/cgi-bin/waisgate.cgi?WAISdocID=79424328091+0+0+0&WAISaction=retrieve](http://www.access.gpo.gov/cgi-bin/waisgate.cgi?WAISdocID=79424328091+0+0+0&WAISaction=retrieve)

Are **YOU** prepared? There are less than 250 days until Monday, December 22, 2003, the effective date for the Centralized Waste Treatment (CWT) regulations (40 CFR 437). If you have any categorical industrial users required to meet these effluent limitations, you might want to circle this date on your calendar and review the regulations. *For EPA guidance on how to comply with the CWT regulations, see [www.epa.gov/waterscience/guide/CWTcompliance\\_guide.pdf](http://www.epa.gov/waterscience/guide/CWTcompliance_guide.pdf)*

The Local Government Environmental Assistance Network (LGEAN) has developed a new wastewater fact sheet entitled, *Wastewater Treatment: Sources of Potential Environmental Liability for Local Governments*. Electronic copies of the fact sheet are available online at [www.lgean.org](http://www.lgean.org) or by calling (877)TO-LGEAN or by e-mailing [lgean@icma.org](mailto:lgean@icma.org)

---

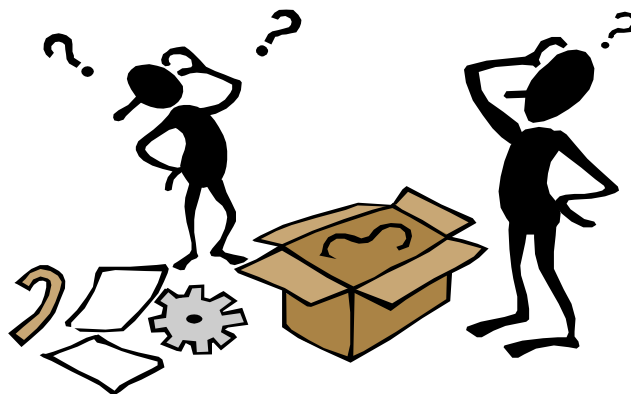
### ....Coordinator (continued from page 1)

discussed the details of implementing a long-term monitoring program to conduct continuous allowable headworks loading evaluation. This "verification" that the current local limits are still protective of the wastewater facilities can be submitted in lieu of a comprehensive short-term, intensive monitoring event for re-evaluating local limits. This approach could save the control authority money in terms of personnel time. The DEP will also be able to reduce its review time of submissions that qualify under the alternative approach. In the next several weeks you should be getting a memorandum from the Department describing this alternative approach for local limit re-evaluation. Included with the memorandum will be a copy of a technical paper prepared for the 2003 Florida Water Resources Conference, a re-evaluation submission checklist, and an updated plan of study checklist. We believe that control authorities should take advantage of this alternative approach. After you review this material, you will see there are several advantages of implementing such a strategy.

Keep up the great work you are doing. We look forward to seeing you at your next inspection or FIPA workshop. Remember that we're here to help as well as to regulate. We're only a phone call or e-mail away.

## Quick Quiz ...

1. Local Limits must be....?
  - A. Protective and Enforceable
  - B. Developed by pretreatment programs with greater than 5 industrial users
  - C. Re-evaluated on a periodic basis
  - D. All of the above
  - E. Only A & C
2. An advantage to using a sequential sampler during a sampling event is that it allows you to characterize the waste stream over a daily cycle.
  - A. True
  - B. False
3. What is the compliance date for the Centralized Waste Treatment regulations (40 CFR 437)?
  - A. December 12, 2003
  - B. April 28, 2004
  - C. December 22, 2003
  - D. November 24, 2003
4. When performing a periodic re-evaluation of your local limit pollutants, the recommended minimum sampling frequency for long-term monitoring is?
  - A. Annually
  - B. Quarterly
  - C. Bi-Annually
  - D. Never
5. When calculating local limits, removal efficiencies derived from sludge data should be used in place of effluent data when a POTW has influent data above detection, but does not have adequate effluent data above detection.
  - A. True
  - B. False



6. The term MAHL stands for maximum allowable headworks loading?
  - A. True
  - B. False
7. Which DEP rule governs wastewater disposal for wetland applications in Florida?
  - A. 62-621
  - B. 62-639
  - C. 62-611
  - D. 62-604
8. A composite sample should be preserved within \_\_\_\_\_ minutes of the last collected sample?
  - A. 5
  - B. 15
  - C. 25
  - D. 45

Do you have a question that you would like featured in Quick Quiz? We will be glad to publish it. Just send your questions and answers to:

Florida Industrial Pretreatment Association  
 Pretreatment Communicator Editor  
 205 Meadowcross Drive  
 Safety Harbor, Fl. 34695  
 Kimberly.Ouellette@stpete.org

Please include your name and organization with all submissions.

KEY 1-E, 2-A, 3-C, 4-B, 5-A, 6-A, 7-C, 8-B



# PRETREATMENT Communicator

APRIL 2003, VOLUME 8 ISSUE 2

PUBLISHED BY THE FLORIDA INDUSTRIAL PRETREATMENT ASSOCIATION



Pretreatment Communicator  
205 Meadowcross Drive  
Safety Harbor, Florida 34695

The **Pretreatment Communicator** is a quarterly publication of the Pretreatment Program of the Florida Industrial Pretreatment Association. 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, Florida Industrial Pretreatment Association, 205 Meadowcross Drive, Safety Harbor, Florida 34695.

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 (727) 551-3025. The Florida Industrial Pretreatment Association 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 Association.

A Special Thanks to the City of St.Petersburg, Public Utilities Department, Director, Patricia Anderson for facilitating production of this newsletter.

FIPA President: Brian Dean  
Editor-in-chief: Kimberly Ouellette

Please recycle or pass this newsletter on to other pretreatment aff.

## In This Issue....

Page 1.....	Coordinators Desk
Page 2.....	FIPA's new logo & website
Page 3.....	Upcoming Meetings
Page 4.....	Robert E. Heilman Award Application
Page 5.....	Training Survey
Page 6.....	In the News
Page 7.....	Quick Quiz