

The Pretreatment Communicator

Third Quarter 2003



A Message from the President

Brian J. Dean

For those of you that missed the latest FIPA meeting, you missed an excellent opportunity to meet and greet fellow pretreatment professionals from around the state and you missed some outstanding presentations. I want to commend Terry Karda and Kassandra Barnes from Broward County for making the local arrangements. They even arranged for some iguanas to make an appearance in the bushes. US Biosystems was kind enough to provide a delicious lunch to the group, and the meeting was well attended.

The next workshop will be in Orlando on September 19. An agenda should be ready by the middle of July so you can make arrangements to attend. Some possible topics include the new Centralized Waste Treatment Standards and sampling. There will also be some activities on September 18 including a tour of a laboratory and a possible social event in the Disney area. Please look for updates on the web site. A listing of motels is already posted so you can make reservations. Make reservations now, the lower priced rooms at the Disney properties will go quickly. We do have some big sponsors, so the meeting should be fun.

The next short school will be in Fort Pierce the week of August 11. There will not be a school in the Cocoa/Titusville area this year. The "B" and "A" level classes were cancelled at the school in Plant City. The spring school will probably be in Plant City again so if you want to be near the coast, this is your chance. I have my reservations so I hope the classes fill up.

The DEP sampling SOPs are currently under review and some revisions will be made. Workshops are scheduled for the first week of August. The crew from the DEP will be in Tallahassee on August 4, West Palm Beach on August 6, and Orlando on August 7. If you want any input or would like some advanced information, plan on attending one of these meetings. Check out the DEP web site for more details.

I put a survey in the last Communicator to gauge interest in having the FIPA arranging sampling training from the FDEP. I only received two responses for a total of about 10 students. This is the same training that was held in Tallahassee. I attended the first session and found the opportunity to get training directly from the folks that may audit your sampling program to be an excellent opportunity. Since the SOPs are in revision, the training will be delayed for a few months. I will bring the matter up at the next meeting and try to set up some training for the end of the year or for early next year. The Florida Society of Environmental Analysts has also expressed an interest in a possible joint training session.

Check out the WEF site if you're interested in attending the EPA Industrial Pretreatment Training sessions. Our own illustrious Dr. John Parnell teaches a portion of the training. The next session is in Chicago the first week of August. There is also the chance that a session will be in Florida next year. Many of you may remember the training we had in Gainesville a few years ago. This is a boot camp for pretreatment staff with tons of information in a few days.

Finally, the revision to the Table of MDLs for Surface Water Discharges required by Chapter 62-4 is under revision and should be completed soon. This table is used to determine the acceptable MDLs when reporting to DEP. The biggest concern for most programs will be the MDL for Mercury. The revision will probably require programs to use EPA Method 1631 for Mercury and will require Method 1669 (Clean Hands/Dirty Hands) for sampling surface water discharges. The DEP IPP staff is already requiring low-level mercury for local limit development. Many of the treatment plants may discover that they are in violation for Mercury once testing is done using the new trace metals methods.

Until we meet again, I wish you well.

COORDINATOR'S DESK

By: Bob Heilman
FDEP Pretreatment Coordinator



We've just completed another DEP fiscal year as of June 30. There are now 63 approved and active pretreatment programs in Florida. The newest approved program is the City of Bartow in Polk County. All programs had an audit, a compliance inspection, or a technical assistance visit during the year. This past year, compliance by the approved pretreatment programs is higher than ever.

However, as we finished the last of our pretreatment program inspections for the fiscal year, it has come to our attention that there are few program areas that continue to surface as recurring deficiencies. While we realize that we will never achieve 100% compliance with every aspect of the program requirements, we do expect to see continued improvements and compliance with previously noted problems. Unfortunately, this is not always the case. Therefore, I would like to discuss two program issues that are still not being properly addressed in hopes that we can improve our program compliance rates.

The first issue that often appears as a repeat deficiency is the tracking of industrial user (IU) compliance data and the calculation of significant noncompliance (SNC). There are a few control authorities that have failed to implement a data tracking system that is used to demonstrate either compliance or noncompliance with permit limitations using the required six-month, rolling quarter process. The Department has provided a simplified spreadsheet for this purpose, which can be found on the CD in the front pocket of the Florida Guidance Manual and explained in Chapter 8, or there is commercial software available that can be purchased for this purpose. It is very important to track IU self-monitoring and control authority (CA) monitoring data using the required procedures. We have talked to several CAs that didn't know an IU was in SNC until they put the accumulated data in the SNC tracking form. They were surprised at the results because, on the surface, the IU appeared to be in compliance. However, the results from the spreadsheet indicated otherwise. If you have not been using some sort of compliance data tracking system to determine if an IU is in SNC, I would encourage you to start. We will continue to review your program files and specifically look to see what system you're using. If you don't have an adequate system, your program might be placed in SNC on the EPA quarterly noncompliance report (QNCR).

The second item that sometimes shows up as a deficiency during our inspections and audits is the lack of IU self-monitoring observation by the CA. It is a requirement in the pretreatment program that the CA ensure that all IUs are complying with the DEP standard operating procedures for sampling quality assurance (QA). You can only certify IU compliance by being present when either the IU's contract laboratory personnel or the IU's own staff is taking samples. You must verify that whomever is collecting the samples is following approved procedures, using the necessary QA techniques (e.g., equipment blanks, field blanks, duplicates, splits, etc.), and sampling at the correct location. The observations that the CA makes in the field must then be documented in the IU files by completing a memo to the file, notes, or some other supporting documentation. Please be advised that if you see something that is incorrect or unacceptable during your self-monitoring observation, you should let the IU manager know that the data could be compromised by inadequate QA procedures. It would then be up to the IU to speak to those who collected the samples. If the CA is conducting the IU self-monitoring, then this should also be noted in the IU file. If you're not complying with the above requirements, you are encouraged to start immediately. We will be checking on compliance with this requirement during the next round of inspections and audits.

We truly believe that CAs want to do the right thing. Part of our job is letting y'all know what the "right thing" is. I hope that the information provided here is a help to you. If you need more details on what is available for compliance data tracking and SNC calculations, or if you don't understand your responsibilities for IU self-monitoring, please feel free to contact either your DEP program engineer or me at (850) 245-8605.

Help Wanted, Program Improvements

by Marc Harris, FDEP

As most of you are well aware, each year the Department conducts formal evaluations of every industrial pretreatment program (IPP) in Florida. The 2002/2003 evaluation year has recently come to a close and the inspections and annual report reviews have revealed that most programs have made tangible improvements. Program evaluations are intended to ensure that all program components being implemented and prior corrective actions have been initiated. Unfortunately a large number of programs have not addressed some repeat significant deficiencies. As a result, the Department is considering stepping up enforcement actions against programs that have repeat deficiencies. Two of the common deficiencies have already been mentioned elsewhere in this newsletter (see Coordinator's Desk). Listed below are some additional common repeat deficiencies that have been identified over the past year. These are also some of the easiest

deficiencies to identify and correct.

1. Submittal of sampling data with unacceptable method detection limits and practical quantification limits.

A list of Department-established analytical methods, and corresponding method detection limits (MDLs) and (PQLs), which is titled "Florida Department of Environmental Protection Table as Required By Rule 62-4.246(4) Testing Methods for Discharges to Surface Water" dated June 21, 1996, is available at the following web site: <ftp://ftp.dep.state.fl.us/pub/labs/assessment/guidance/mdlppl.pdf>

The MDLs and PQLs listed in this table constitute the minimum MDL and PQL values the Department will accept. Any method listed in the table for the specific parameter may be used for reporting as long as it meets the following requirements:

- a. The laboratory's reported MDL and PQL values for the particular method must be equal to or less than the corresponding method values specified in the table; and,
- b. The laboratory's reported PQL for the specific parameter is less than or equal to the permit limit or applicable water quality criterion stated under Rule 62-302.530, F.A.C., Table: Criteria for Surface Water Quality Classifications, if a permit limit does not exist. If, however, the PQLs for all methods listed in the table for that parameter are above the stated permit limit or the applicable water quality criterion, then the method with the lowest stated PQL must be used.

One method of ensuring that the correct methods are used is to develop an analytical specifications document that lists for each parameter to be tested: the applicable permit limit or water quality criterion; the analytical methods that the control authority (CA) will request the laboratories to perform; and the laboratories corresponding minimum MDLs and PQLs. The analytical result sheets from the laboratories would then be compared by the CA to the analytical specifications to ensure that the correct methods were performed. In addition, the CA could provide a copy of the analytical specifications document to the laboratories performing the analysis and have an authorized representative at each of the laboratories sign a statement acknowledging receipt of the copy thereby establishing proof that the laboratories are aware of the CA's regulatory requirements for the pretreatment analytical work. Please note that next year if the methods do not meet the above requirements, the CA will be required to resample for all parameters incorrectly analyzed.

2. Failure to adhere to the enforcement response plan.

The CAs must follow their approved enforcement response plan (ERP) when violations occur. The ERP outlines, in a step-by-step fashion, the procedures to be followed by CA staff to identify and document pretreatment violations, and the specific remedy the CA must use to respond to a particular violation. The type of remedy is usually dictated by the severity and habitual nature of the violation. If the violation is a repeat offense, then the CA must escalate the enforcement action as stipulated in the ERP. The CA must also carry out the required steps in the time frame specified in their ERP. Only by adhering to the approved ERP can a CA ensure consistent enforcement for similar violations and circumstances.

3. Insufficient use of resources for updating industrial waste survey (IWS).

CAs need to update their IWS on an annual basis using various available methods. In addition to County occupational licensing information, local business directories and drive-by inspections, CAs are strongly encouraged to search through the Toxic Release Inventory (TRI) database which can be found at www.RTK.net, and the SARA Title III forms submitted to the local emergency planning committee (LEPC) and talk to the local Fire Department to support the annual IWS update.

As prevention is the cornerstone for any pretreatment program, the IPP coordinators should review the areas of their program listed in this newsletter and implement the necessary corrections before the next sampling event required for their annual report submittal, and before their next program inspection, to prevent possible enforcement action from being taken against their program.

FOR IMMEDIATE RELEASE

Aug. 15, 2003

**UF/TREEO Offers Energy Use in Water Quality Systems
Course as Part of Pollution Prevention Week**

GAINESVILLE, Fla. - The Center for Training, Research and Education for Environmental Occupations (UF/TREEO) will present the course "Documenting and Improving Energy Use in Water Quality Systems" as part of National Pollution Prevention Week, Sept. 15-21, 2003. This free course will be held on Sept. 16, 2003 at UF/TREEO, 3900 SW 63rd Blvd., Gainesville, Fla. and is co-sponsored by the Florida Pollution Prevention Roundtable.

The course was developed by UF/TREEO with funding from the Environmental Protection Agency to train environmental trainers on energy efficiency so that they can then present the training to municipalities in their geographic area. The goal of the training is to develop awareness of energy consumption, promote understanding of energy conservation and to increase energy efficiency by using energy conservation measures in municipally owned water facilities throughout the United States. The course includes energy conservation strategies for water and wastewater treatment facilities and new energy saving technologies now available in the industry. Award-winning certified environmental trainer Edward M. Toby III, CET, senior training specialist at UF/TREEO, will teach the course.

"This course is a perfect fit with this year's P2 week theme "Conserving Energy Prevents Pollution," said UF/TREEO Director William T. Engel, Ph.D., CET. "We are honored to have been asked to be a part of such an important effort to advance pollution prevention awareness."

National Pollution Prevention Week is an opportunity for individuals, businesses, and government to emphasize and highlight their pollution prevention and sustainability activities and achievements, expand current pollution prevention efforts, and commit to new actions. By sharing information about pollution prevention, businesses can become more competitive, business and government can realize cost savings, and environmental quality can be enhanced. The University of Florida Center for Training, Research and Education for Environmental Occupations (TREEO) offers more than 250 non-credit, professional development courses each year, as well as technical assistance, in the environmental and health and safety fields.
