PRETREATMENT COMMUNICATOR

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COORDINATOR'S DESK

Change is in the Wind

Bob Heilman. P.E.
FDEP Pretreatment Coordinator

Well it looks like summer has arrived in Florida. The temperatures are regularly in the 90's, the humidity is high, and the rainy afternoons have started. Along with these changes we are about to end another State fiscal year for our pretreatment program. As I have done in the past at this time of year, I would like to share with you some of the changes we foresee and describe our new "focus area" for the next fiscal year.

Before I get into the proposed program changes for next fiscal year, I would like to recap a few items from this past year. First I want to compliment you all on the outstanding job you are doing in implementing the requirements of the pretreatment program in your service areas. The number of approved pretreatment programs that have been in significant noncompliance (SNC) this fiscal year has dropped significantly. In fact, for each quarter of this fiscal year, there was 100% compliance by the approved pretreatment programs. As great as this sounds, it does not mean that there were no programs in SNC. What the data indicates is that even though some programs were in SNC, they returned

to compliance before the end of the reporting quarter. Many thanks to those of you whose program was in SNC for quickly resolving the deficiencies that got you there. We have also seen improvements in several specific program areas that we have been targeting for the last couple of years. Review of the industrial users (IU) files has revealed that many of you are now conducting observations of your IU self-monitoring events. Your observation of this activity has uncovered several problems in the self-monitoring processes. Some of you have told us that some of your IUs were not sampling in the correct locations, some of the contract laboratories were not setting up composite samplers properly, there were some samples that didn't have the proper preservation or were collected incorrectly, etc.

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CLEANING UP SHOP - P2 IN IPP

Kassandra Barnes
Broward Co. Office of Environmental Services (BCOES)

The Problem: Vehicle maintenance and repair facilities discharge wastewater high in Total Recoverable Petroleum Hydrocarbons (TRPH), Total Toxic Organics (TTO) and certain heavy metals (Zinc, Lead, Nickel).

Most facilities of this type have floor drains to allow for mop water and wash down runoff. The drains also allow maintenance shops to keep the work area free from oily spills.

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EIGHTH ANNUAL P2 CONFERENCE

Gainesville August 4-6

This years conference includes some sessions that may be helpful to your IP program our your IU's:

- P2 Projects in Enforcement
- P2 & Hospital Waste streams
- P2 Technologies
- Clean Marinas

Visit the following website for detailed information on the conference:

http://www.treeo.ufl.edu/p2/conference/

TRAINING OPPORTUNITES

August 4-6	Statewide P2 Conference get more info at (http://www.treeo.ufl.edu/p2/conference/)	Gainesville
August 10-12	EPA/WEF Workshop- Introduction and Intermediate Courses	Tampa
August 11-13	EPA/WEF Workshop- Intermediate and Advanced Courses (http://www.wef.org/conferences/workshop_semin/)	Tampa
August 16-20	Short School get more info at (http://www.fwpcoa.org/main.html)	Ft. Pierce
September 17	FIPA Fall Workshop	Orlando

A MESSAGE FROM THE PRESIDENT

I am sorry that I was unable to attend the June 2004 DEP/FIPA Workshop in Fort Pierce but, I was told that it was very well organized and informative workshop. I would like to thank our host Mark Mathis for doing such a good job. I also want to thank the vendors and sponsors Harbor Branch Environmental Laboratory and ISCO Sampling Equipment for their sponsorship and support. Mark has offered this facility for FIPA in the future for other workshops or training events. FIPA and I want to thank you for your offer.

The next FIPA workshop it will be in Orlando at City Walk in Universal Orlando. This event will be called "**THE FIPA BLOWOUT".** The Workshop will be at the Jazz Center in City Walk and lunch will be at the Latin Quarters. To complete the day we will have a dinner party that evening followed by some fun in the Park. The contact at Universal Orlando is also working on a package for the family if you care to stay for the weekend to enjoy the theme park. I have made arrangements with the Doubletree Hotel at the entrance to Universal Orlando for a GROUP RATE for this time period. If any one is interested please call my office (407-246-2664) for more details. We will put this information on the FIPA website as it comes together. This will include directions and a list of other hotels.

We will be adding the minutes from the June board meeting to the FIPA website so you will know what the Board has been doing.
I hope to see you at the **FIPA BLOWOUT** in Orlando September 17, 2004.

Sincerely
Andy Johnson, FIPA President

Congratulations to

Rob Powers !!

With the City of Clearwater

For winning the 2004

Albert B. Herndon Award

The award recognizes Rob's outstanding performance in the administration and enforcement of the City of Clearwater's Pretreatment program.

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 parndp@jea.com. 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

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The list of deficiencies was quite lengthy. Of course, that is exactly why we want you out there when IUs conduct self-monitoring events. Remember that the data the IUs provide can only be valid if it was collected properly.
Another area we focused on this past year was ensuring that the control authorities and the IUs were using only certified laboratories for any compliance monitoring. Now that most of the State's commercial and private laboratories have been inspected and certified by the Florida Department of Health using the NELAP criteria, it has become less of a problem to verify that acceptable laboratories are being used. We also spent a fair amount of time ensuring that the appropriate test methods were being used with acceptable detection limits. While there are still some problems in this area, much progress has been made. We will continue reviewing this data during our pretreatment compliance inspection and audits. Remember to keep the current documentation on file for your laboratories.
As we move into the Fiscal Year 2005, we will again be making some changes in the way we conduct program activities. The very first change I need to make you aware of is not one we had a lot of choice in making. We are again going to loose a DEP pretreatment engineer. Yep, Mike Cheek, our newest staff member, has accepted a two step promotion in another division of the Department. We are very sorry to see Mike leave us so soon, as he was really catching on to the program quite quickly and he was very well liked. Unfortunately, not all of you even got to meet Mike, but if you did, you know what I mean. The good news is that Mike is still with the agency and we wish him all the best in his career choice.

Nominations are Still Being Accepted for the Robert E. Heilman Award

This is awarded to a person who is 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 regulation.
Please submit nominations to
John Parnell
c/o FIPA
205 Meadowcross Drive
Safety Harbor, FL 34695

A more program specific change we will be implementing during the next fiscal year is that we will be e-mailing our standard pretreatment compliance inspection /program audit (PCI/PPA) checklist to the control authorities before we come for our inspection. We want you to complete the interview section of this list prior to our arrival for your PCI or PPA. The main purpose of this change is to expedite the inspection process. We will go over the checklist with you and discuss any items that are not clear or incomplete. Since I am present at all of the pretreatment program audits, rather than just me being present during the interview portion of the audit, two of us will be available to ask and answer questions. This will be very helpful to your assigned DEP pretreatment program engineer, since that person will have the benefit of hearing first hand your responses to the interview questions and related discussions. During the file review portion of the audit, two of us will be reviewing the IU files. Again, we feel this should expedite the review process and result in a more thorough review.
Our specific "focus area" this coming fiscal year will be on how the control authority conducts IU inspections. Rather than us (DEP) taking the lead on IU inspections as part of PPAs, as we often did in the past, now the control authority will conduct a complete facility inspection with the DEP personnel as observers. From this change, we will get a better picture of the quality of IU inspections. If we do observe any major deficiency or violation during an inspection that the control authority overlooks, we will take the initiative to call it out to the IU and it will be noted in our report. We encourage your inspectors to "be themselves" during these inspections. They should conduct their inspections as if we are not there.
As you can see from above, there are some changes in the wind. However, change can be a good thing. I feel that each year our State's pretreatment programs improve because we are all doing our jobs. Remember that we are on the same team. We want to work cooperatively with our programs. We are not just out to find problems, but are only a telephone call or e-mail away to assist you.
Thanks for a great year. Please be patient with us as we find a replacement for Mike.

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Most locations have the floor drains and/or trench drain systems connected to an oil/water separator (OWS) which is designed to provide pretreatment prior to discharge into the sanitary sewer system; a myth that is the root of the oily waste problem in the sewer system.

The Cause: Nature of the repair business, poor housekeeping, lead-acid batteries, engine pressure cleaning, solvent based parts cleaning solutions.

Recommendations:

#1 Seal all floor drains in vehicle service area of repair facilities.

#2 If sealing floor drains is not an option, suggest that the facility consider converting OWS into holding tank. These tanks will be pumped out periodically by a licensed industrial waste hauler and manifested to reflect disposal. This procedure establishes a Best Management Practice which would lead to "Zero Discharge" and eliminate the need for permitting.

Support findings:

• An OWS does not provide full treatment to all the pollutants that are washed down drains (metals, organics, pH, chlorinated solvents, and brake fluids). The myth that an OWS is all that is needed for treatment of these waste streams is obsolete; even when installed to code and approved by your city.

• There is a potential for slug discharges when these wastes accumulate and they are allowed to pass through to the sewer, due to emulsification or lack of maintenance.

• Implementing this initiative ensures that all the waste streams (especially floor mop water; see picture this page) from a vehicle service/repair shop are removed by a license industrial waste transporter, while manifesting insures proper treatment/disposal at a Centralized Waste Treatment facility.

• Violators of the SUO will become more apparent as they will lack disposal manifests for oily wastewater. The Control Authority should advise the facility to keep records for at least three years.

• If and when a spill occurs the environmental consequences may be minimized because it will be contained on site.

• This policy will improve housekeeping, foster waste minimization/ reduction at the source, and result in direct savings for the User.

• Some business owners will claim that they do not want to seal floor drains because rainwater run-off and/or flooding conditions will occur. However, in accordance with the BCOES Sewer Use Ordinance (SUO) - rain/storm water runoff are prohibited discharges into sewer lines.

If there is a Septic Tank that oily waste drains into; a cease and desist of the discharge should be required. Why? To eliminate the possibility of groundwater contamination.

BCOES Success stories:

A cooperative agreement was established with our lift station, underground response and maintenance staff.

Mop Water du Jour

A new policy was established whereby when a complaint is called in by our operations staff, the pretreatment section is notified so we can investigate the source. BCOES has also provided training sessions to the underground and wastewater staff at the cities discharging waste to the BCOES wastewater plant under multi-jurisdictional agreements. This training informs the operations crew of what they should look for in the field. It also has created a great asset since they now inform BCOES of any unusual underground circumstances they observe.

In most of the following success stories, the nature of the waste (oil/solvent & hydrocarbon) made it easy to trace back by doing individual inspections of all the facilities connected to the down stream lift station. We targeted the most probable culprits first, reviewing their manifest and disposal paperwork, always careful to request manifests for disposal of oily floor mop wastewaters. Lastly, if there were no manifests found, BCOES would simply ask, "Where does this waste go?" Most of the time the answer was, "It goes to a drain." The following cases were brought to the attention of the BCOES pretreatment staff:

(Continued on next page)

MARK YOUR CALENDAR NOW!

For the FIPA Blow Out

September 17, 2004

Following the FIPA Workshop in Orlando

Details to Follow!!

Heavily impacted wet well downstream from automotive shop

Facility "X" – Solvent laden waste passing through the separator at this facility set off lift station LEL alarms and made it inaccessible on several occasions. In addition there had been complaints about fumes from their building. Finally a call came into pretreatment staff regarding the problem, which triggered an inspection. During the inspection of "X" it was found that engine degreasing was done in a bay inside the facility and solvent was then allowed to go to the OWS where it eventually passed thru to the sewer. Also the waste in the separator was being hauled by a septic hauler (not-licensed for this type of waste) and disposed of at our septic waste receiving facility.

Enforcement actions were brought against "X" and the SRF waste hauler. The OWS was sealed and the waste stream is removed by a licensed industrial waste hauler. Now the workers and the environment are safe.

Facility "Y" - At this location, the facility management had a corporate Standard Operation Procedure (SOP) for the OWS, however, frequent changes in management led to the neglected maintenance of the OWS. In addition the SOP did not give specific language about disposing of oily mop water therefore it was poured down the floor drains. These discharges overwhelmed the system and the waste ended up in the sewer system. Once the pretreatment staff was notified, BC-IPP conducted inspections and reviewed their SOPs regarding OWS maintenance. The SOPs provided general information about OWS maintenance but did not give sufficient directives or explain the limitation of OWS relative to oily and solvent laden waste.

In this case when addressing OWS issues locally, BC – IPP was also able to make "Y" aware of a possible problem at all locations within the corporation.

"Y" has since adopted a policy of sealing floor drains in many of their facilities throughout Florida and the nation.

Facility "Z"- This facility cleaned its floors with mineral spirits. This did a great job of cleaning all of the transmission fluid – down into the drain. This facility opted not to seal the floor drains, they instead insisted they would contain the waste and have a licensed hauler remove the waste. The facility did not think we would be back to check and they choose not to deal with the problem accordingly. Therefore, instead of containing and shipping waste they ignored our required actions, and increased the problem. When the waste reached the lift station it subsequently increased disposal cost, labor cost and time, and caused significant down time for the county resulting in a $5,000 penalty for the facility. The final outcome, they now <u>really</u> do have the waste removed by a licensed industrial waste hauler.

Savings and Cost associated with this policy

The initiative of sealing floor drains/interceptor can translate into significant cost savings (permit fees/analyses cost) for the facility. The choice becomes the owners, the following examples provide a dramatic cost comparison.

Facility "A" chose the permit route instead of sealing the floor/trench drains in their service area. Since 2001, they have incurred over $7,500 in permit related cost. In another case, Facility "B" (that was inspected as a possible new IU) chose the option of hauling waste instead of maintaining floor drains and an OWS. They spend about $100 to $300 per year hauling drums of oily wastewater.

Conclusion

All of the cases shown above demonstrate that if the sealed floor drain/separator policy had been in effect the discharge of pollutants to the collection system could have been prevented. The utility workers would have been safer and the money spent in labor, lift station down time, hazardous waste hauling, inspections, permitting and fines could have been used to improve the environment. If implemented properly, this policy could make widespread improvement in the quality of your influent flows.

Words of wisdom:

• "My facility is up to code and was permitted and ok'd by the city/county etc." - Your response will be "I know your facility is up to city/county codes but it does not guarantee that it will treat the waste generated by your facility, in other words your waste is not up to code."

• As a business owner you have two choices: seal interceptor/floor drains or apply for a permit to make sure your device is treating waste to meet environmental regulations. The burden of proof falls on the facility.