

PRETREATMENT COMMUNICATOR

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COORDINATOR'S DESK

Bob Heilman. P.E. FDEP Pretreatment Coordinator

As you all probably know by now, Chris Jensen has left the Department for "greener pastures." I wish him the best of luck in his new career in a consulting firm. He will be missed. Until I do find a replacement for Chris, Marc, Dawn and I will be splitting Chris's responsibilities between us. So, please call any of us if you have questions. The position Chris vacated will most likely be reclassified as an Environmental Specialist to remove the minimum requirement for an engineering degree. My hope is that I will be able to select a candidate that already has at least a few years of pretreatment experience. This way, the learning curve won't be as steep and I won't have to spend as much time training a new person. If you, or someone you know, has at least two years of pretreatment experience and can meet the minimum education requirements, please contact me. If you would like more information on the position, please let me know. Now for some good news!! I have it from a reliable EPA source that the Pretreatment Streamlining Regulations, proposed back in 1999, will be finalized in June 2005. I know we've been hearing for years that EPA was going final with these regulations, but since the EPA was recently criticized in an Office of the Inspector General Report for not getting regulations out in a timely manner, I think this is something we should see happen soon. I don't know if all thirteen issues that were addressed in the 1999 version will still be included, but I suspect that we will see some significant regulatory relief for the approved pretreatment programs. All I can say is...stay tuned. One other thing you may want to watch out for is an

One other thing you may want to watch out for is an internal issue paper that EPA is required to develop dealing with options on how to facilitate the use of removal credits. Just to refresh your memory, a removal credit can be granted to a categorical industrial user based on the Publicly Owned Treatment Works (POTW) ability to remove that pollutant through its treatment process.



For example, if a POTW can remove a significant amount of copper, such that it would not violate either its surface water discharge limits or biosolids limits, an industrial user discharging copper could be granted an increase in its discharge over the categorical limit. While this sounds like a simple and logical concept, the

regulations for the demonstration of the <u>consistent removal</u> of the pollutant and the assurance of no permit violations is quite burdensome for the control authority. To date, there have been few POTWs in the nation that have agreed to issue removal credits due to their potential liability. I'm sure at some point, (Continued on page 3)

SIZING UP SEPARATORS

Linda Fielder St. Johns Co. Utility Department

Our utility department just recently boarded the oil and grease train. In developing our ordinance we used other ordinances for guidance. Knowing little to nothing about oil and grease management we used a pinch of this ordinance and a smidge of that one trying to cover all bases. We figured we were good to go. Then, it happened. One of our engineers was reviewing a car wash's construction plans for compliance with oil/water separator requirements when the customer asked..... Why the 750 gallon minimum? Our answer: because it's always been this way. Not a good answer, I know. Thus began my trek into Code territory.

It turns out that our ordinance references two sources, The Plumbing and Drainage Institute PDI-G101 Standard and The Florida Building Plumbing Code. In researching these rules I couldn't find any 750 gallon minimum rule for oil/water separators. (Continued on page 3)

TRAINING OPPORTUNITES

Gainesville April 28 & FDEP SOP Sampling & Training – TREEO

http://www.treeo.ufl.edu/water/ Oct. 18

WEF/EPA Introductory, Intermediate, and June 6-9 Dearborn, MI

Advanced IP Topics

http://www.wef.org/conferences/workshop_semin/

June 16-17 FIPA Summer Workshop Clearwater



A MESSAGE FROM THE PRESIDENT



Well I had a great time in Jacksonville for the February 2005 FIPA Workshop. This was a first being in Jacksonville for the workshop. JEA did a great job

with the arrangements for the two days. We had a much anything please let me know. If you have any ideas better turn out for the first day on the lab information than was anticipated. I hated that I missed the Budweiser Hospitably night with the tour. I was felling a little under the weather that evening. The setup for the second day was also very good with a great view of Jacksonville. Thanks go out to Dan and his staff for a great job!

I want to thank Josam (Ed Miles), Ecosolve (Ralph Rogers), and AMJ (John Van) for their support as sponsors in the FIPA/DEP Jacksonville Workshop. As most of you know these sponsors help our Association with the cost of meals/refreshments and site set ups. So make sure that you take the time to visit our sponsor's displays at the workshops.

The June workshop in Clearwater should be interesting. FIPA President This will be another first time location for the FIPA

workshop. Rob Powers will be the host and he is trying to put together a two-day workshop as well. I have not heard any complaints about having a two day workshop. If there is any one that feels differently please let me know.

If there is anything I can do to help someone with for our association or know of a possible workshop sponsor please let me or one of the officers know.

Dan Parnell is the editor for the FIPA/FDEP newsletter and he will have more information on the up-coming June Workshop. If you have an article to share please let him know. To keep you updated on FIPA business, the minutes from the February board meeting have been added to the FIPA website (<fipaonline.org>). Hope to see you all at the June Workshop in Clearwater, FL.

Sincerely, Andy Johnson

MARK YOUR CALENDARS FOR THE

FIPA Summer Workshop

Where: Clearwater When: June 16 &17 Topic(s): 6/16 - TBD

6/17 - Managing Silver & Mercury

Waste Streams

Agenda, directions, & accommodations will be out in May.

JAIL HOUSE BLOCK(AGES) Part 2

Mark Mathis Ft. Pierce Utilities Authority

An article appeared in the March 2004, Pretreatment Communicator discussing solid waste discharge to The Fort Pierce Utilities Authority (FPUA) sanitary sewerage system. Solid waste consisting of whole oranges, plastic bags toothbrushes and a host of other material was continually discharged from the County's Correctional Facility. Material accumulating in the force main serving the facility created abnormally high (Continued on page 4)

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. 2 Editor - Dan Parnell

PDI addresses sizing considerations for grease traps and interceptors, but there's nothing on oil/water separators. The Florida Building Code, Plumbing section 1003.7.2, did state a capacity requirement but no 750 gallon minimum. So, where did it come from? It turns out the Florida Building Code was written using The Florida Administrative Code. The FAC has a 750 gallon minimum standard for grease interceptors [section 64E-6.013(8)(d)] which, by the way, came from the Dept. of Health. Again, there's nothing on oil/water separators. Therefore our ordinance does not back up a 750 gallon minimum for oil/water separators. After the papers settled we decided it would be wise to draw up a list of enforceable rules for our engineers to reference in the future. This is what we've got.

Oil/Water Separator Standards

The following rules are written in accordance with the following:

- ORD: St. Johns County Oil and Grease Management Ordinance
- FBPC: Florida Building Plumbing Code Chapter 10, Sect 1003
- References: FAC: The Florida Administrative Code
- References: DOH: Florida Department of Health
- PDI: The Plumbing and Drainage Institute PDI-G101 Standard

Who needs an oil/water separator?

- Automotive related enterprises, laundromats, and other users which contribute wastes containing petroleum based oils – ORD.
- Repair garages, gas stations (w/ grease racks, pits or work racks, car washes and/or wash racks), factories where oily and flammable liquids are produced – FBPC.
- Existing facilities found to be contributing petroleum based oils in quantities sufficient to cause line stoppages or increase lift station maintenance ORD.

Who does not need and oil/water separator?

- Parking garages that meet none of the above criteria— FBPC
- Commercial garages for storage only FBPC.

What determines the size or capacity of an oil/water separator?

• For establishments where automobiles are serviced, greased, repaired or washed, or where gas is dispensed, Oil/water separators shall have minimum capacity of: 6 cubic feet for the 1st 100 square feet of area to be drained + 1 cubic foot for each additional 100 square feet of area to be drained into separator – FBPC. Capacity is based on peak flows – ORD.

What other standards must the oil/water separator meet?

• It must be approved by the plumbing official – FBPC. (Continued on page 4)

Voluntary IP Certification Update

The Spring Short School in Lake City marked the final time IP Certification will be offered through the FWPCOA. Starting in the Fall of 2005, certification will be through FIPA.

FIPA certification classes will coincide with the week of FIPA Workshops and hosted by the respective IP program. This will provide many advantages to FIPA members:

- Reduced burden of travel cost associated with attending a workshop in one city and Certification classes at another.
- •Instructional days will be reduced to reflect the amount of time that is needed to cover the course material. In other words, 3 days of material/test will be covered in 3 days, not 5. This will reduce the burden on instructors (as well as students) who must give up time at work to teach.
- Since fewer days are required for class, lodging cost will also be reduced.

It is hoped that the new format will make Certification classes more convenient and economical to attend.

Please remember that CEU's will still be available for those that need them.

The next Certification school will be for the "C" course at the Fall FIPA Workshop. The "B" and "A" courses should be available in 2006.

(Coordinator, Continued from page 1)

the States and the POTWs will have an opportunity to comment on any proposals by the EPA to simplify the removal credit requirements. When that time comes, I urge you to provide your thoughts to EPA.

On a final note, I would like to thank the folks at JEA for the great job they did in hosting the last FIPA workshop in February. The private tour and product sampling at the Anheuser-Busch Brewery was a real nice addition to the technical agenda. I am looking forward to the next workshop in Clearwater Beach on June 16 and 17. See you there!

(Jail House, Continued from page 2)

pressures hindering downstream lift stations. The situation caused sewage back ups.

County officials readily acknowledged the problem. Commissioners approved a \$170,000 allocation for the design and construction of a solid waste removal system. Hazen and Sawyer Environmental Engineers integrated an Auger Monster screening system into the facility's waste stream. The Auger Monster is located downstream from an existing Muffin Monster.

Theory of Auger Monster Operation

Solid waste material is shredded as it passes through the Muffin Monster. Shredded particles collect against a perforated stainless steel screen located in the Auger Monster. Differential in water level triggers the auger portion of the Auger Monster at a predetermined "Run" level. Brushes on the auger sweep accumulated solids from the screen as the auger rotates. The spiral configuration of the auger conveys solid material out of the waste stream where it is bagged for disposal.

Win-Win Situation

The Auger Monster has virtually eliminated the discharge of solid waste materials from the facility. Treatment plant operators as well as lift station maintenance crews are breathing a sigh of relief from the reduction of solid waste material entering the collection system. Lift stations that contribute to the



Business end of the Auger Monster

Correctional Facility force main are once again operating properly. County officials are realizing that this improvement project increases the reliability of wastewater service to the 1,200-bed facility. This enables the County to provide a safe environment for inmates and correction officers. If your treatment plant is experiencing similar problems, contact FPUA Pretreatment Coordinator, Mark Mathis to arrange to see this system in operation.

Contact information:

Mark Mathis - (772) 466-1600, ext. 5517



What goes up, must be bagged

(Separators, Continued from page 3)

- It must have a control manhole or inspection box ORD.
- It must provide for easy access for maintenance and inspections ORD & FBPC.

No wastes that do not require treatment or separation shall be discharged into separator – FBPC.

Detailed requirements are found in section 1003.7.1 and 1003.7.2 of Ch. 10 of FBPC.

These are the rules we can back up. It's a start but it's also a lesson learned. The moral of this story: If you want your ordinance to say something then let it speak for itself. References are an easy catch all, but be sure they have everything you need. We know we need to fix our ordinance. This is one of several oversights we've come across and it's an example of how much we've yet to learn. Our plan is to fix our ordinance after we get our feet wet so we don't end up with countless rewrites. And trust me, it will be very specific.