



Florida Department of Environmental Protection

CHAPTER 62-625 PRETREATMENT REQUIREMENTS FOR EXISTING AND NEW SOURCES OF POLLUTION

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❖ *Overview of All Rule Changes*

❖ *Summary of Required Changes*

❖ *Timeline*

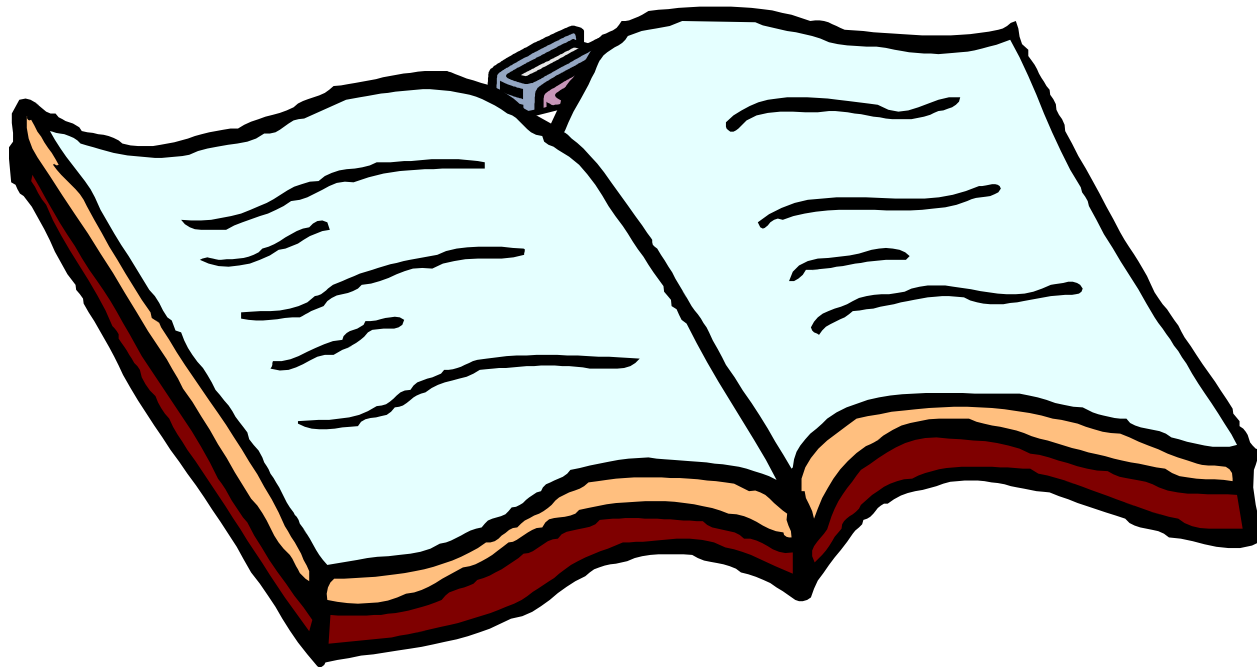
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What Changes Have Been Made?





62-625, F.A.C. Sections Changed

- 100 Scope/Intent Purpose
- 110 Applicability
- 200 Definitions
- 400 Prohibited Discharges
- 410 Categorical Standards
- 420 Removal Credits
- 500 Program Development and Submission
- 510 Program Review and Approval Procedures
- 540 Modification of Pretreatment Programs
- 600 Reporting Requirements
- 700 Fundamentally Different Factors
- 820 Net/Gross Calculation
- 880 Tables





Summary of Changes

62-625.100 Scope / Intent / Purpose

- ❖ The objectives now clarify the intent to reuse sludge and reclaimed water

62-625.110 Applicability

- ❖ Now applies to Class I disposal wells (40 CFR 146)





Summary of Changes

62-625.200 Definitions

Added

- ❖ Best Management Practice (BMP)
- ❖ Categorical Industrial User (CIU)
- ❖ Grab Sample
- ❖ Instantaneous Limit
- ❖ Maximum Allowable Industrial Loading (MAIL)
- ❖ Method Detection Limit (MDL)
- ❖ Non-Significant Categorical Industrial User (NSCIU)

Removed

- ❖ Approval Authority – Now Department
- ❖ Measurement – Now MDL





Summary of Changes

62-625.200 Definitions

Revised

- ❖ Control Authority (CA)
- ❖ Pass through
- ❖ Permit
- ❖ Pretreatment
- ❖ Pretreatment Standard
- ❖ Responsible Corporate Officer
- ❖ Significant Industrial User (SIU)
- ❖ Slug Discharge
- ❖ Wastewater facility (WWF)





Summary of Changes

62-625.400 Prohibited Discharges

- ❖ Utility may develop Best Management Practices (BMP)
 - ❖ BMPs are enforceable and considered pretreatment standards

62-625.410 Categorical Standards

- ❖ Allows concentration limits to be converted to mass limits if certain conditions are met
- ❖ Industrial User's File must contain documentation of how equivalent limits were determined





Summary of Changes

62-625.420 Removal Credits

- ❖ General Housekeeping
- ❖ Clarified newspaper notification requirements





Summary of Changes

62-625.500 Program Development and Submission

- ❖ Clarified who must develop a program
 - ❖ Now includes Class I disposal wells
- ❖ Industrial User Permit Requirements
 - ❖ May be individual permits or general control mechanisms
 - ❖ Permits must contain Best Management Practices (if used)
 - ❖ Permits must include process to seek waiver of pollutants not expected to be present
 - ❖ Permits must contain requirements to control slug discharges (if determined to be necessary by the Control Authority)





Summary of Changes

62-625.500 Program Development and Submission

- ❖ Control Authority Sampling / Inspection
 - ❖ Inspect and Sample once per year
 - ❖ If pollutant has been waived sample once per permit cycle
 - ❖ Non-Significant CIU's must be evaluated annually to determine if the NSCIU continues to meet all criteria
 - ❖ Reduced Reporting SIU's must be sampled and inspected once every two years





Summary of Changes

62-625.500 Program Development and Submission

- ❖ Slug Control Plan
 - ❖ New SIUs must be analyzed for the need to develop plan within 1 year
 - ❖ SIUs must notify Control Authority immediately if there is a change that affect the potential for slug discharge



Summary of Changes

62-625.500 Program Development and Submission

- ❖ Significant Non Compliance (SNC)
 - ❖ Wording changed to exceed “a numeric pretreatment standard or requirement, including instantaneous limits”
 - ❖ Includes Any other violation of a pretreatment standard or requirement (daily maximum, long-term average, instantaneous limit, or narrative standard)
 - ❖ Reports must be 45 days late to trigger SNC
 - ❖ Includes Any other violation or group of violations, including a violation of best management practices, which the control authority determines will adversely affect the operation or implementation of the pretreatment program,





Summary of Changes

62-625.500 Program Development and Submission

- ❖ Local Limits
 - ❖ Plan of Study must be submitted prior to beginning sampling necessary to determine local limits
- ❖ Enforcement Response Plan
 - ❖ Describe how Control Authority will investigate non-compliance including: sampling, data review, site visits and inspections
 - ❖ ERP must address: limit violations, self-monitoring and reporting violations, compliance schedule violations, and inspection violations





Summary of Changes

62-625.510 Program Review and Approval

- ❖ Newspaper Publication Requirements
 - ❖ No longer required to be a daily paper
 - ❖ Newspaper must be of “general” circulation within the WWF jurisdiction
 - ❖ Must meet the requirements of 50.011 and 50.013, F.S.





Summary of Changes

62-625.540 Modification of Pretreatment Programs

❖ Substantial Modification

- ❖ Becomes effective upon approval by the Department if no substantive comments were received from the publication of the Notice of Request for Approval
- ❖ Changes no longer considered substantial
 - ❖ Modifications to pH local limit (must meet federal standards)
 - ❖ Reallocations to Maximum Allowable Industrial loading of a pollutant that does not increase total industrial loadings
 - ❖ Significant reductions in Control Authority's Pretreatment Resources
 - ❖ Changes in WWF's residual disposal and management procedures





Summary of Changes

62-625.540 Modification of Pretreatment Programs

- ❖ Non Substantial Modification
 - ❖ Must notify the Department 45 days prior to implementation
 - ❖ Will be deemed to be approved by Department 45 days after submittal unless the Department determines modification is substantial





Summary of Changes

62-625.600 Reporting Requirements

- ❖ Industrial User Monitoring
 - ❖ Added language for NSCIU and BMP requirements
 - ❖ Allows the Control Authority to waive sampling of categorical pollutant if criteria are met
 - ❖ If Control Authority samples in lieu of industrial user, the Control Authority must resample (or require the industrial user to sample) within 30 days and pollutant found in violation
 - ❖ Clarifies that sampling procedures are for all analyses, not just base line reports
 - ❖ All monitoring results of any regulated pollutant at the appropriate monitoring location must be reported
 - ❖ Annual Certification required for all NSCIUs

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Summary of Changes

62-625.600 Reporting Requirements

- ❖ Control Authority Reports
 - ❖ The Control Authority's Industrial User list must include all SIUs, CIUs, and NSCIU's
 - ❖ Clarifies what samples are required for annual reports (only 503 metals are required for residuals)
 - ❖ Industrial User must notify the control authority and public utility (if public utility is not control authority) of any change in discharge
 - ❖ All reports for the Control Authority must have an Authorization submitted with or prior to the report
 - ❖ Control Authority must retain supporting documentation for authorizing reduced reporting requirements for 3 years after expiration of permit





Summary of Changes

62-625.600 Reporting Requirements

- ❖ Local Limits
 - ❖ Control Authority must re-evaluate local limits within 180 days of permit issuance





Location of Draft Rule

**Strikethrough / Underline version of Rule showing all changes
summarized in this presentation**

<http://www.dep.state.fl.us/water/rules.htm>

Draft Rules – Water and Wastewater





What Changes are Required?





Required Changes

Program Development / Modification

- ❖ Public Utilities using Class I Injection wells (40 CFR 146 dischargers) are now required to develop an approved pretreatment program unless the public utility has no significant industrial users
- ❖ All newspaper publication requirements have changed (from a daily paper with the largest circulation to a newspaper with general circulation within the WWF jurisdiction) Must meet the requirements of 50.011 and 50.013, F.S.





Required Changes

Program Development / Modification

- ❖ Substantial Modification - Becomes effective upon approval by the Department if no substantive comments were received from the publication of the Notice of Request for Approval
- ❖ Non Substantial Modifications - Must notify the Department 45 days prior to implementation



Required Changes

Program Development / Modification

- ❖ All reports for the Control Authority must have an authorization submitted by the principal executive officer or ranking elected official naming the Duly Authorized Employee with or prior to the report
- ❖ An approved Plan of Study is required prior to the Control Authority conducting any sampling for the establishment of local limits



Required Changes

Sampling and Inspections

- ❖ All SIUs must be inspected and sampled by the Control Authority once per year (not 12 months)
- ❖ If sampling for a pollutant has been waived, the Control Authority must sample for this pollutant once during the permit cycle
- ❖ If Non-Significant CIUs are granted, the Control Authority must annually determine the requirements are met to continue as NSCIU



Required Changes

Sampling and Inspections

- ❖ If reduced reporting is granted, the Control Authority must sample and inspect every two years
- ❖ The Control Authority must analyze the need to develop a slug discharge control plan for all new SIUs within one year
- ❖ The Pretreatment Residuals DMR (PRT-R) must sample for all 503 metals – any other parameters shown on DMR should be shown as MNR



Required Changes

Industrial User Permits

- ❖ SIUs must notify Control Authority immediately if there is a change that affect the potential for slug discharge
- ❖ Permits must contain requirements to control slug discharges (if determined to be necessary by the Control Authority)
- ❖ Permits must include process to seek waiver of pollutants not expected to be present
- ❖ Industrial User's File must contain documentation of how equivalent limits were determined





Required Changes

Sewer Use Ordinance

- ❖ Significant Non- Compliance (SNC) Criteria updated
- ❖ Add / Modify the Definitions as needed
- ❖ If the Control Authority chooses to adopt any of the optional changes, the Sewer Use Ordinance must be updated



Required Changes

Enforcement Response Plan

- ❖ Must Describe how the Control Authority will investigate non-compliance including:
 - ❖ Sampling
 - ❖ data review
 - ❖ site visits
 - ❖ Inspections

- ❖ ERP must address:
 - ❖ limit violations,
 - ❖ self-monitoring and reporting violations
 - ❖ compliance schedule violations
 - ❖ inspection violations





When do the changes begin?





Timeline

40 CFR 403

❖ Effective November 14, 2005

62-625, F.A.C.

❖ Effective May 10, 2010





Timeline

Control Authority Program Modifications

❖ Optional

- ❖ Can begin the process of Program Modification immediately
 - ❖ Submit draft SUO and ERP to the Department with any optional streamlining changes and all required changes
 - ❖ Adopt the revised SUO after Department approval
 - ❖ Submit the Program Modification request to the Department
 - ❖ The Department will review the modification and issue the Notice to be published in the newspaper
 - ❖ If no comments are received, the modification will be approved





Timeline

Control Authority Program Modifications

- ❖ Required
 - ❖ Will be a permit condition for the WWF renewal
 - ❖ Submit draft SUO and ERP to the Department with all required changes and any optional changes
 - ❖ Adopt the revised SUO after Department approval
 - ❖ Submit the Program Modification request to the Department
 - ❖ The Department will review the modification and issue the Notice to be published in the newspaper
 - ❖ If no comments are received, the modification will be approved





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