

Florida Department of Environmental Protection



Industrial Pretreatment Program

Compliance & Enforcement Strategy

May 1, 2015





FY 15: To-Date Industrial Pretreatment Program Statistics

- 27 Pretreatment Compliance Inspections
- 10 Pretreatment Program Audits
- 27 Annual Report Reviews
- 4 Program Modification Approvals
- 0 Reportable or Significant Non-Compliance
- 64-bit version of LLIDs in Beta Testing



Annual Reports

- Due date specified in facility permit
- Send hardcopies to:

**Florida Department of Environmental Protection
Domestic Wastewater Section, Mail Station 3540
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400**



Optional Submittal Format

- A complete electronic copy in PDF format via email, followed by snail-mail copies of:
 - A physical copy of the **AR certification** page with an “inked” signature.
 - Physical copies of the **DMR signature pages** (PRT-I, -E, & -R, for Control and Covered facilities) with “inked” signature.
 - Send physical copies to Tallahassee address.
- Email PDF copies to greg.brown@dep.state.fl.us or upload to FTP : <ftp://ftp.dep.state.fl.us/pub/incoming> (Place in “_Pretreatment Annual Reports”)
- Call or email me to let me know that it has been uploaded to the FTP.

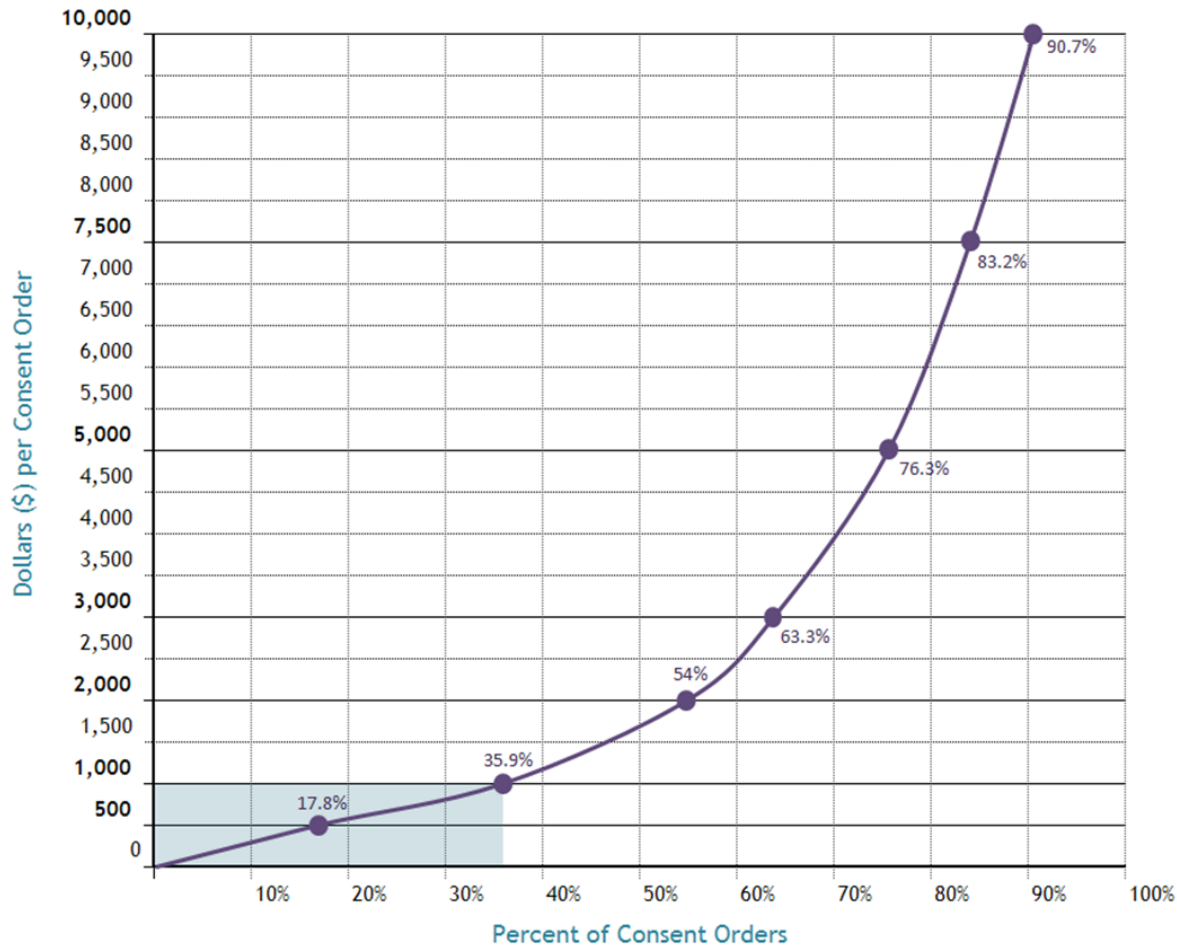


Compliance & Enforcement Strategy

- GOAL: Achieve positive environmental results.
- OBJECTIVE: Apply the best compliance and enforcement method to resolve a violation and prevent further violations.
- MEANS: Informal and Formal Methods
 - Informal: Verbal Compliance Assistance and Compliance Assistance Offers (CAO).
 - Formal: Warning letters and administrative and judicial actions (enforcement actions).
- For the Industrial Pretreatment Program, this applies only to PCI/PPAs.



Compliance & Enforcement Strategy



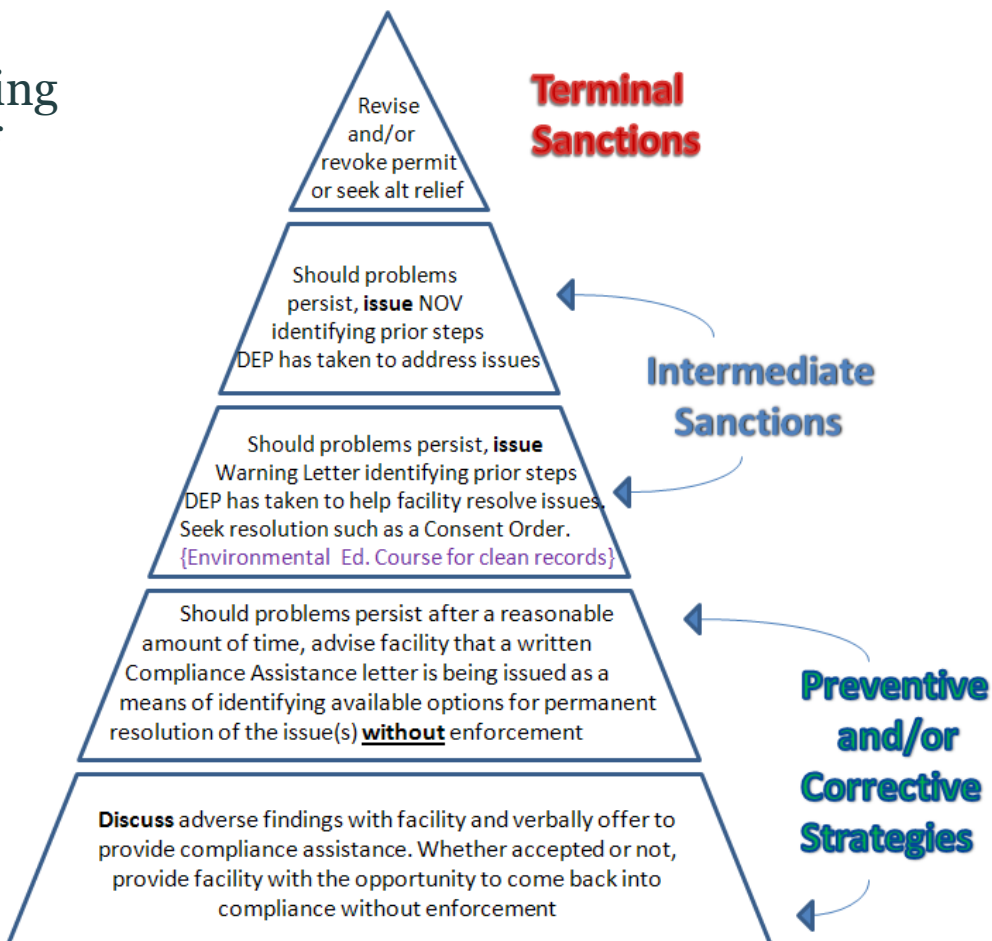
FY10 – 11 AND FY11 – 12

Actual penalties assessed from Consent Orders, Final Orders and Final Judgment (1592 total).

Of those, **64%** were \$3,000 or less and **36%** were \$1,000 or less.

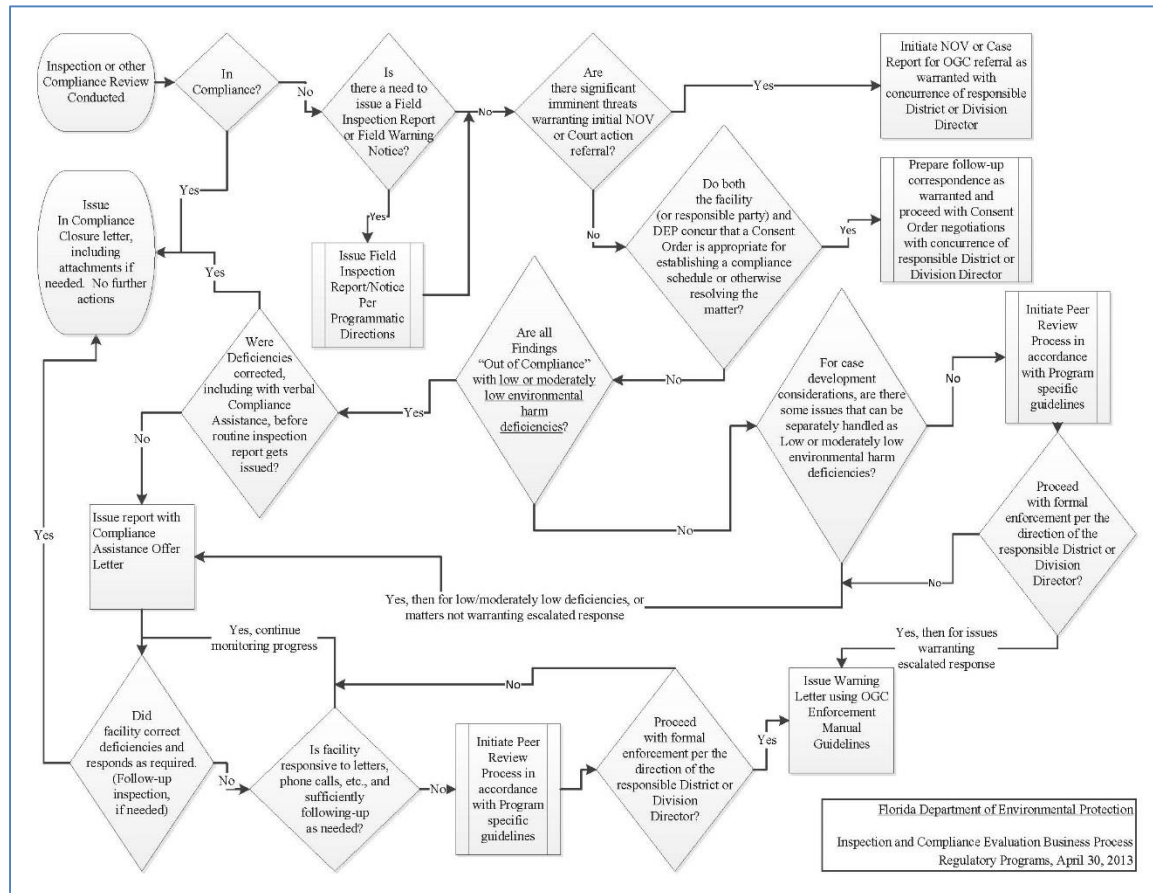
Compliance & Enforcement Strategy

Methodology for approaching non-compliance matters of LOW and MODERATELY LOW environmental harm.

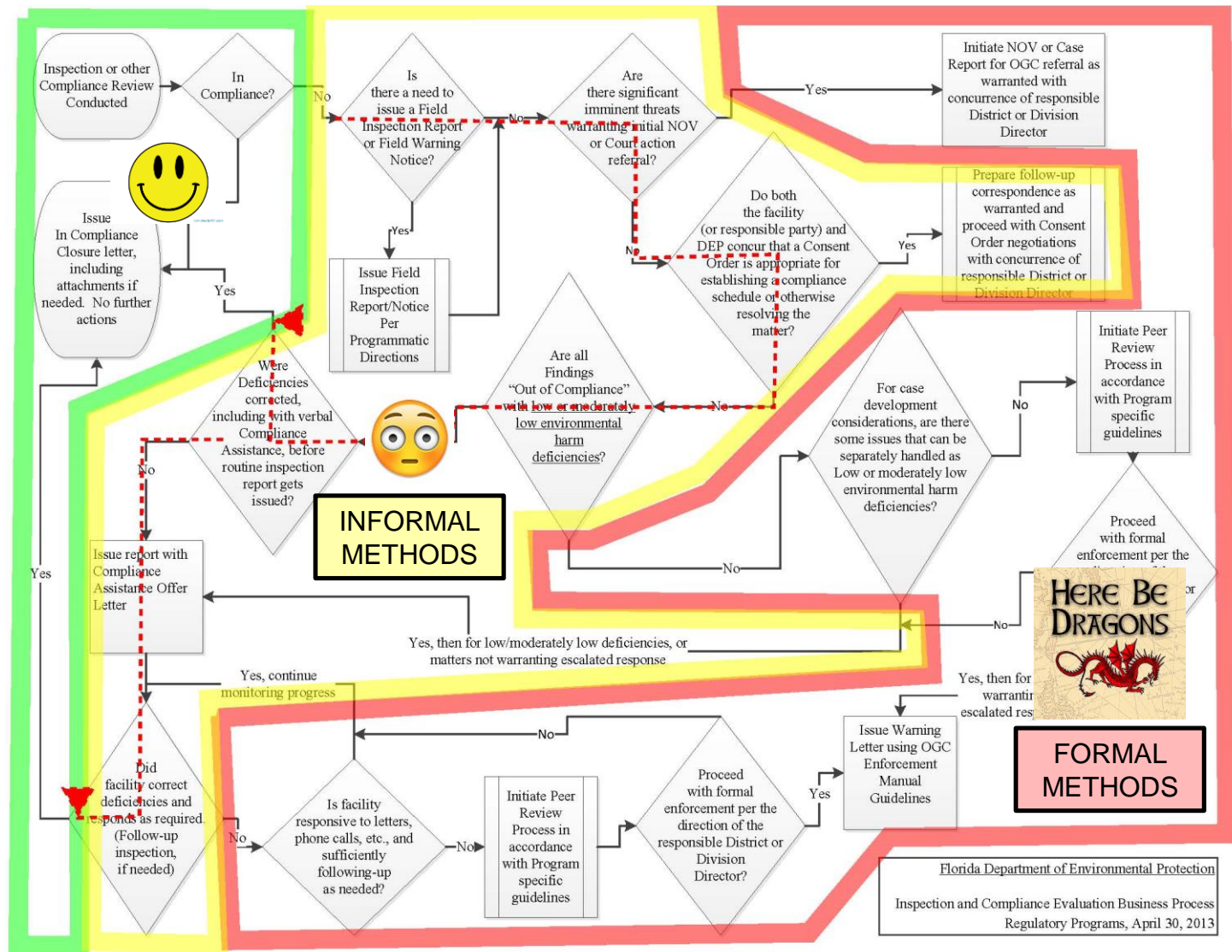


Compliance & Enforcement Strategy

Inspection and Compliance Evaluation Business Process



Compliance & Enforcement Strategy





Compliance & Enforcement Strategy

- Practical Consequences
 - **Green** – Closure Letter from Tallahassee IPP.
 - Informal Methods
 - **Yellow** (Scenario 1) – Verbal Compliance Assistance from Tallahassee IPP.
 - Email with phone call summarizing compliance issues
 - Respond satisfactorily within 15 days, return to the “**Green Zone**” and get a Closure Letter from Tallahassee IPP.
 - **Yellow** (Scenario 2) – Issues that can not be resolved within timeframe will be documented in a Compliance Assistance Offer Letter from the District with possible follow-up inspections.
 - Formal Methods
 - **Red** – Warning Letters, Notice of Violations/Consent Orders, Revise/Revoke Permits or seek alternative relief; initiated by the District.



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