

# 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](mailto: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.

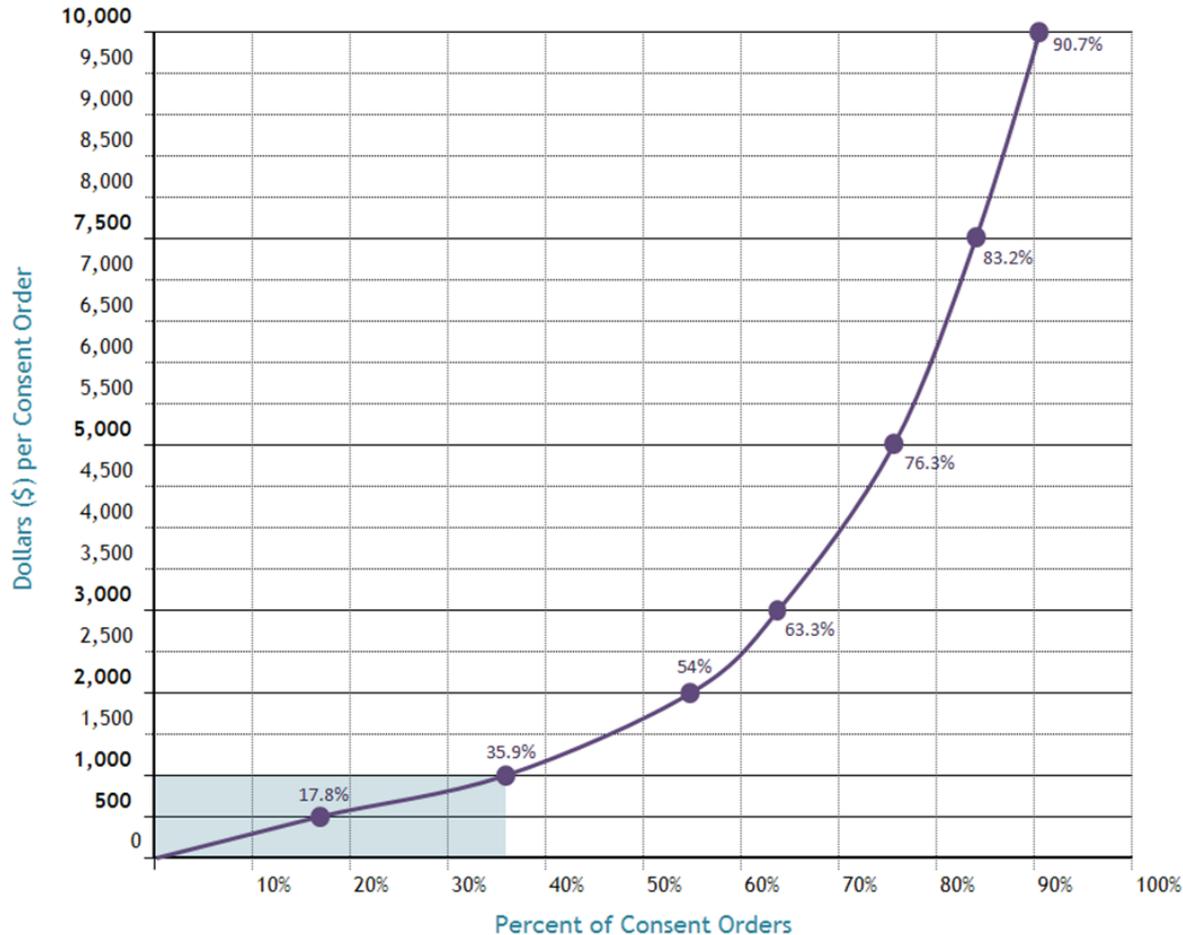


# Compliance & Enforcement Strategy

- **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

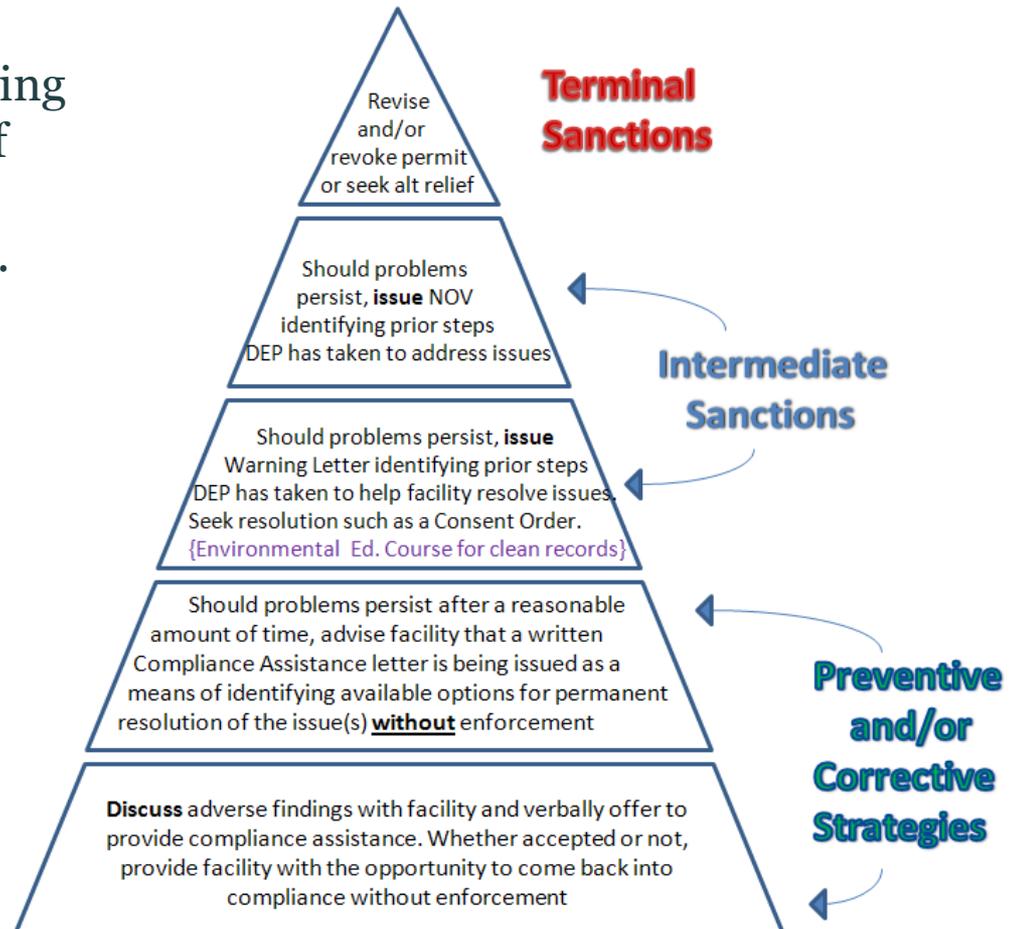
Actual penalties assessed from Consent Orders, Final Orders and Final Judgment (1592 total).

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

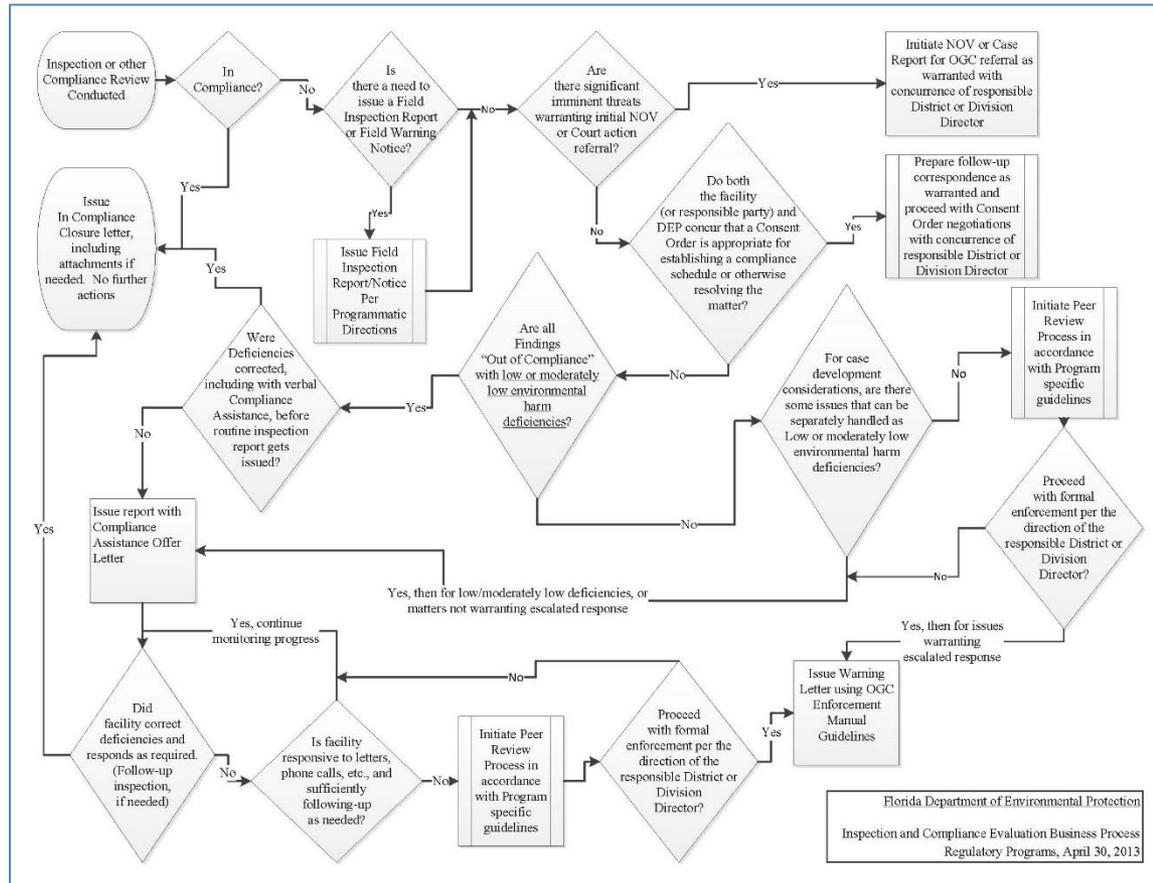


# Compliance & Enforcement Strategy

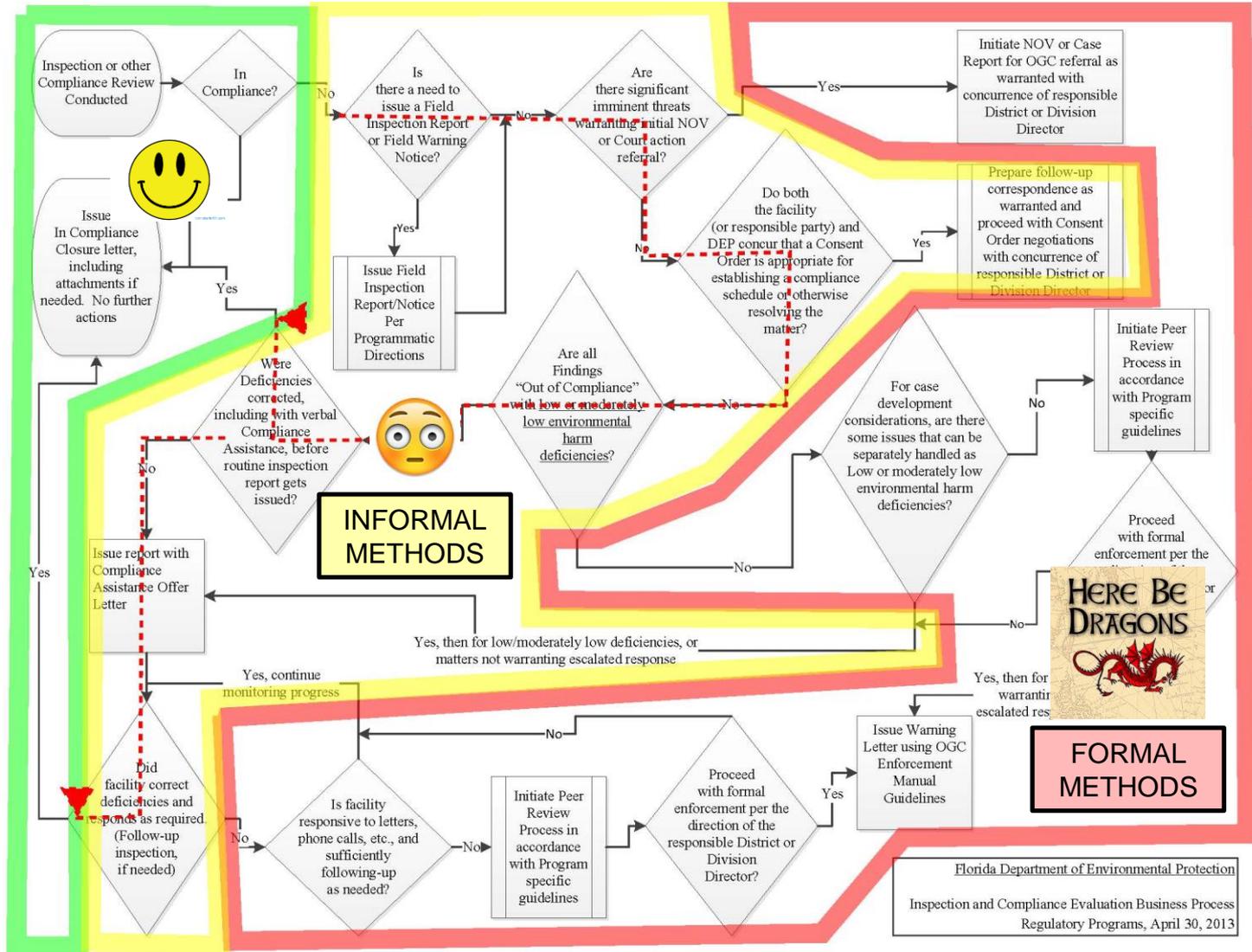
Methodology for approaching non-compliance matters of LOW and MODERATELY LOW environmental harm.



## 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.



# Contact Information

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