Message

From: FloresThiebaud, Astrid [Astrid.FloresThiebaud@dep.state.fl.us]
Sent: 11/17/2015 4:34:31 PM
To: Wahlstrom-Ramler, Meghan [Wahlstrom-Ramler.Meghan@epa.gov]
CC: Champion, Jacquelyn [Jacquelyn.Champion@dep.state.fl.us]
Subject: RE: Questions regarding NPDES permit FL0020940

Meghan,

The limits in condition I.A.1 of the permit have not changed and still the same. For that reason, the facility needs to meet the more stringent effluent concentration in the permit.

I modified the previous language. Please see below:

According with Rule 62-600.420, All domestic wastewater facilities are required, at a minimum, to provide secondary treatment of wastewater. New facilities and modifications of existing facilities shall be designed to achieve an effluent after disinfection containing not more than 20 mg/L CBOD5 and 20 mg/L TSS, or 90% removal of each of these pollutants from the wastewater influent, whichever is more stringent. All facilities shall be operated to achieve, at a minimum, the specified effluent limitations (20 mg/L). This facility has continuously met the limits specified in condition I.A.1 of the permit which is most stringent.

Astrid

From: Wahlstrom-Ramler, Meghan [mailto:Wahlstrom-Ramler.Meghan@epa.gov]
Sent: Tuesday, November 17, 2015 9:21 AM
To: FloresThiebaud, Astrid <Astrid.FloresThiebaud@dep.state.fl.us>
Subject: RE: Questions regarding NPDES permit FL0020940

Astrid,

Ok, I really need to drink a cup of coffee before I start sending e-mail. I'm sorry. I see now that you say, "in addition to the limits in Condition I.A.1 of the permit'. I'm assuming that those limits in I.A.1 have not changed and still have the same daily max (10ug/L), monthly average (6.25), etc. as they did in the draft permit you sent out. The language about 20 mg/L is just the standard language in your regs. Since you have the wording "in addition to" the more stringent effluent concentrations in the permit would then take presidence.

Sorry for my own confusion this morning.

Thanks,

meghan

From: FloresThiebaud, Astrid [mailto:Astrid.FloresThiebaud@dep.state.fl.us]
Sent: Tuesday, November 17, 2015 8:46 AM
To: Wahlstrom-Ramler, Meghan
Cc: Champion, Jacquelyn
Subject: RE: Questions regarding NPDES permit FL0020940

Good morning Meghan,

Please see below new language for the Fact Sheet:

In addition to the specified limits in Condition I.A.1 of the permit, All domestic wastewater facilities are required, at a minimum, to provide secondary treatment of wastewater. New facilities and modifications of existing facilities shall be designed to achieve an effluent after disinfection containing not more than 20 mg/L CBOD5 and 20 mg/L TSS, or 90% removal of each of these pollutants from the wastewater influent, whichever is more stringent. All facilities shall be operated to achieve, at a minimum, the specified effluent limitations (20 mg/L).

Please let me know if this language is clear and you are ok with it.

Thanks

Astrid

From: Wahlstrom-Ramler, Meghan [mailto:Wahlstrom-Ramler.Meghan@epa.gov]
Sent: Monday, November 16, 2015 4:08 PM
To: FloresThiebaud, Astrid <Astrid.FloresThiebaud@dep.state.fl.us>
Subject: RE: Questions regarding NPDES permit FL0020940

Just to clarify, that isn't then removing the 90% removal requirement that you guys have, correct? I know you said it during our phone conversation today, but I just wanted to make sure that was still then a requirement.

Thanks!

Meghan

From: FloresThiebaud, Astrid [mailto:Astrid.FloresThiebaud@dep.state.fl.us]
Sent: Monday, November 16, 2015 4:06 PM
To: Wahlstrom-Ramler, Meghan
Subject: RE: Questions regarding NPDES permit FL0020940

Good afternoon Meghan,

The SWD-FDEP is planning to use the following language in the Fact Sheet:

In addition to the specified limits in Condition I.A.1 of the permit, the monthly average effluent concentration for carbonaceous biochemical oxygen demand (5-day) and total suspended solids shall not exceed 15% of the respective influent values (i.e., 85% removal), which is based on the Rule 62-600.420 Minimum Treatment Standards - Technology Based Effluent Limitations (TBELs).

Please let me know if you are ok with the language.

Sincerely

Astrid

From: Wahlstrom-Ramler, Meghan [mailto:Wahlstrom-Ramler.Meghan@epa.gov]
Sent: Monday, November 16, 2015 9:15 AM
To: FloresThiebaud, Astrid <Astrid.FloresThiebaud@dep.state.fl.us>
Subject: RE: Questions regarding NPDES permit FL0020940

Astrid,

Thanks for getting back to me. I have one final question for you. Where in the permit does it reference the 62-600.420 standard? Since that is more restrictive than the secondary standard (90% removal vs 85% removal) I don't think you need to put in the language you proposed.

Thanks!

Meghan

From: FloresThiebaud, Astrid [mailto:Astrid.FloresThiebaud@dep.state.fl.us]
Sent: Friday, November 13, 2015 2:53 PM
To: Wahlstrom-Ramler, Meghan
Cc: Champion, Jacquelyn; Thompson, Steve
Subject: RE: Questions regarding NPDES permit FL0020940

Good afternoon Meghan,

Please find the District response to your questions below, in red, and attached. Please let me know if you have any additional questions.

Sincerely

Astrid Flores Thiebaud
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Permitting and Waste Cleanup Programs
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Southwest District
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Helpful Links: Waste | Forms | Rules
Drinking Water | Forms | Rules
Wastewater | Domestic Wastewater | Forms | Rules
http://www.dep.state.fl.us/secretary/info/permitting.htm

From: Wahlstrom-Ramler, Meghan [mailto:Wahlstrom-Ramler.Meghan@epa.gov]
Sent: Friday, October 30, 2015 3:32 PM
To: FloresThiebaud, Astrid <Astrid.FloresThiebaud@dep.state.fl.us>
Subject: Questions regarding NPDES permit FL0020940

Astrid,

It was great talking to you today. Below is a summary of my questions:

1) My first question is regarding the Secondary Treatment Standards of 85% removal for BOD_5 and TSS. I wasn't able to find any reference of that requirement in the permit. If it's not there, do you know when/why it was removed?

SWD-FDEP Response:

Typically, the Department doesn't include this reference because the facility must meet the criteria of Rule 62-600.420 (please see below) . However, we can add the following language to the FS: In addition to the specified limits in Condition I.A.1., the monthly average effluent concentration for carbonaceous biochemical oxygen demand (5-day) and total suspended solids shall not exceed 15% of the respective influent values (i.e., 85% removal), which is based on the Rule 62-600.420 Minimum Treatment Standards - Technology Based Effluent Limitations (TBELs).

Rule 62-600.420 - Minimum Treatment Standards
(1) Secondary Treatment.
(a) Surface water disposal (excluding ocean outfalls).
All domestic wastewater facilities are required, at a minimum, to provide secondary treatment of wastewater. New facilities and modifications of existing facilities shall be designed to achieve an effluent after disinfection containing not more than 20 mg/L CBOD5 and 20 mg/L TSS, or 90% removal of each of these pollutants from the wastewater influent, whichever is more stringent. All facilities shall be operated to achieve, at a minimum, the specified effluent limitations (20 mg/L). All facilities shall be subject to provisions of Rule 62-600.110, F.A.C., regarding the applicability of the above requirements, and Rules 62-600.440, 62-600.445 and 62-600.740, F.A.C., regarding compliance with these requirements. Appropriate disinfection and pH control of effluents shall also be required.
(b) Surface water disposal via ocean outfall.
1. All domestic wastewater treatment plants discharging to Class III coastal waters shall meet, at a minimum, the appropriate secondary treatment criteria contained in paragraph 62-600.420(1)(a), F.A.C. Appropriate disinfection and pH control of the effluents shall also be required. Discharges to coastal waters are subject to the applicable limitations of Rule 62-600.520, F.A.C.
2. All domestic wastewater treatment plants discharging to open ocean waters are required, at a minimum, to provide secondary treatment as defined herein. New treatment plants and modifications of existing plants shall be designed to achieve an effluent prior to discharge containing not more than 30 mg/L CBOD5 and 30 mg/L TSS, or 85% removal of these pollutants from the wastewater influent, whichever is more stringent. All facilities, whether new or existing, shall be operated to achieve, at a minimum, the specified effluent limitations (30 mg/L) and shall be subject to the provisions of Rules 62-600.440, 62-600.445 and 62-600.740, F.A.C., regarding compliance with these requirements. Appropriate disinfection and pH control of the effluents shall also be required. Deviations from the minimum treatment requirements for all facilities, whether new or existing, discharging to open ocean waters shall only be approved pursuant to subsection 62-600.520(5), F.A.C.

2) My second question in regarding the reasonable potential analysis for the effluent sample that was submitted with the facility's application. When I looked at the sampling results, it looked like there were detections of several parameters, most of which were under the Water Quality Standards. There are three, however, that I'm unsure of.

   a. The first is copper. According to the results, the daily maximum concentration for copper was 3.8 ug/L and the average daily concentration was 2.3 ug/L. In comparison, the FL Class III marine waters limit is 3.7 ug/L. Based on that, it looks like the daily max concentration is above the limit. Maybe that 3.7 ug/L isn't comparable to the daily max?
      SWD-FDEP Response: Copper is part of the discharge effluent sampling. In addition, please see attached email information provided by the facility.
   b. The second is benzo(a)pyrene. According to the sample results, the daily max was 0.94 ug/L and the average daily was 0.93 ug/L. The FL Class III marine waters limit, however, is 0.031 ug/L annual average. How was it shown that benzo(a)pyrene was not in violation of the annual average.

SWD-FDEP Response: please see attached email information provided by the facility.

c. Finally, the third parameter is benzo(a,h)anthracene. The sampling results showed a daily max of 0.95 ug/L and an average daily of 0.94 ug/L. As with benzo(a)pyrene, the Class III marine waters limit is 0.031 ug/L annual average.
SWD-FDEP Response: please see attached email information provided by the facility.

Thanks!

Meghan

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Internet Improvement Survey

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