Message

From: FloresThiebaud, Astrid [Astrid.FloresThiebaud@dep.state.fl.us]
Sent: 11/13/2015 7:53:19 PM
To: Wahlstrom-Ramler, Meghan [Wahlstrom-Ramler.Meghan@epa.gov]
CC: Champion, Jacquelyn [Jacquelyn.Champion@dep.state.fl.us]; Thompson, Steve [Steve.Thompson@dep.state.fl.us]
Subject: RE: Questions regarding NPDES permit FL0020940
Attachments: 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
Engineer IV
Permitting and Waste Cleanup Programs
Florida Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813) 470-5760
Fax: (813) 470-5996
Email: astrid.floresthiebaud@dep.state.fl.us

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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

Meghan Wahlstrom | Environmental Engineer | Water Protection Division | USEPA Region 4
Atlanta Federal Center | 61 Forsyth Street SW | Atlanta, GA 30303-8960
(404) 562-9672 | Wahlstrom-ramler.meghan@epa.gov