



# Northeast District Wastewater Update

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# Agenda



- Quality Assurance (QA) Audits
- SSO Reporting Requirements
- Compliance Assurance
- Inspections
- Enforcement
- Reports
- DMRs
- NED Contacts



# Quality Assurance Audits

- QA Rule 62-160:
  - The QA rule requires that standard field sampling and testing follow DEP SOPs. It requires labs to be certified by FDOH for the analyte/method combination.
- The QA Audit consists of:
  - DMR Part A and Part B.
  - Field Sheets and Chain of Custody.
  - Groundwater DMR Part D.
  - Lab Reports.
  - Sampling Calibration and Verification Logs.
- Audit Findings:
  - Included in Inspection Report with compliance ratings.
  - Used to identify corrective actions needed for compliance.

For more information, please visit [www.floridadep.gov/dear/quality-assurance](http://www.floridadep.gov/dear/quality-assurance)



# QA Common Errors – DMR Part A & Part B

- Percent (%) capacity is miscalculated or reported incorrectly.
- DMRs not submitted on time.
- Plant staffing is not fully recorded.
- Transcription Errors.



# QA Common Errors – Field Sheets and CoC

- Lot numbers and expiration dates of preservatives are not documented.
- Sample temperature is not recorded at time of receipt.
- Facility sampled does not have the permit ID information provided.
- Container types are not documented for each analytical group collected.



# QA Common Errors – DMR Part D

- Exceedances/missing data are not explained in the “Comments” field or in attachment.
- Preservation type and amount not listed for samples taken.
- Flow rate during sample collection were not recorded or appropriate for analytes collected.
- All columns are not complete for each parameter.



# QA Common Errors – Lab Reports

- Each sample is not associated with a client identification code.
- Lab's DOH Certification number is not provided.
- A statement that the results relate only to the samples listed in report is not provided.
- Each sample & its condition is not clearly described and/or does not have a unique lab sample ID #.



# QA Common Errors – Logs

- Acceptance criteria for calibrations/verifications not properly documented.
- Indication of whether calibrations/verifications passed is not included.
- Value is not listed, or Unit of Standard not indicated.
- Water quality probe unique identifier are not documented.





# SSO Reporting Requirements

- SSOs must be reported in accordance with F.A.C. Rule 62-604.550 & 62-620.610.
- SSOs < 1,000 gallons MUST be reported to the Department within 24 hours from the time the owner/operator becomes aware.
- SSOs > 1,000 gallons MUST be reported to the State Watch Office no later than 24 hours from the time the owner/operator becomes aware.
  - If reporting to SWO is required, a Public Notice of Pollution (PNP) can be submitted via Business Portal submission, or can be submitted on the PNP webpage, or through email or call to DEP.
- <http://floridadep.gov/pollutionnotice>.



# Information for Reporting SSOs

- Name, address, and telephone number of person reporting,
- Name, address, and telephone number of permittee or responsible person for the discharge,
- Date and time of the discharge and status of discharge (ongoing or ceased),
- Characteristics of the wastewater spilled or released (untreated or treated, industrial or domestic wastewater),
- Estimated amount of the discharge,
- Location or address of the discharge,
- Source and cause of the discharge,
- Whether the discharge was contained on-site, and cleanup actions taken to date,
- Description of area affected by the discharge, including name of water body affected, if any; and,
- Other persons or agencies contacted.



# SSO Enforcement

- SSOs can result in a Memo to File, CAO, or Warning Letter which could lead to future formal enforcement and associated penalties.
- An unpermitted or unauthorized discharge or effluent limitation exceedance for a domestic or industrial wastewater violation not involving a surface water or groundwater quality violation. [403.121(3)(b)]
  - Could result in up to a \$4,000 fine per incident.
- An unpermitted or unauthorized discharge or effluent limitation exceedance that resulted in a surface water or groundwater quality violation. [403.121(3)(b)]
  - Could result in up to a \$10,000 fine per incident.



# SSO DEP Portal

- DEP Business Portal.
  - <https://www.fldepportal.com/DepPortal/go/home>.
- SSOs are entered directly by responsible entity to ensure accurate spill information.
- Reduces time spent on multi-agency notifications.
- Notifies District office, populates Public Notice of Pollution and notifies DOH if within one mile of healthy beaches monitoring location.
- Auto-populates nearby water bodies, if needed for report.
- Auto-reminder email to finish report if not completed within five days.



# Compliance Assurance

- Focus is on assisting facilities in coming into/staying in compliance.
- Achieved through:
  - Compliance Assistance Site Visits.
  - Inspections.
  - Outreach.
  - FRWA.



# Inspections – What to Expect

- Inspection scheduling.
- Inspection day:
  - Records.
    - SSOP, hauling, certifications, BMPs, logbook, DMRs, lab data, COC, etc.
  - Facility walk through:
    - Start at headworks and follow the flow throughout the system.
    - Generator.
    - Application area/discharge point.
    - RPZs.
    - Lift stations.
- Inspection follow-up.



# Inspections – Frequently Noted Deficiencies

- No permit on site.
- Overgrown ponds.
- Expired permit/late application.
- Lapse in flow meter calibration.
- Effluent exceedances.
- Missing/late DMRs.
- Incomplete SSOP plan.
- Incomplete or missing biosolids hauling records.



# Inspections – Frequently Noted Deficiencies

- Compliance schedules not met.
- Improper equipment calibration.
- Expired buffers and dates/lot.
- Logbook incomplete and/or wrong format.
- Monitoring well maintenance.
- RPZ leaks/overdue certification.
- Incomplete groundwater field sheets.





# Inspections

- After an inspection in which deficiencies are found:
  - Verbal notification during exit conference.
  - Follow-up email.
- In-compliance letter issued if all deficiencies corrected within 30 days of the inspection.
- 30 days is extremely critical for NPDES facilities.



# Compliance Assistance Offer Letter

- Common sense approach, our priority is working with you to stay in compliance or return to compliance as quickly as possible.
- Compliance Assistance Offer (CAO) letter issued if all deficiencies are NOT corrected within 30 days of the inspection.
- Communication and progress updates are key.
- If no progress after a CAO letter, this usually leads to formal enforcement.



# Enforcement

- Consent Orders are most often used to resolve:
  - Remaining inspection issues.
  - Sanitary sewer overflows.
  - Effluent exceedances.



# Reports

- Annual Reuse Reports.
- Treatment Facility Biosolids Annual Summary.
- Application Site Annual Summary.



# DMRs

- Reminder to review the DMR instructions at the end of the permit.
- When the facility doesn't have biosolids transferred use NOD.
- Reporting analytical results that fall below a laboratory's reported MDL or PQL.
- Be sure to use appropriate qualifier codes.

CODE	DESCRIPTION/INSTRUCTIONS
<	The compound was analyzed for but not detected.
A	Value reported is the mean (average) of two or more determinations.
J	Estimated value, value not accurate.
Q	Sample held beyond the actual holding time.
Y	Laboratory analysis was from an unpreserved or improperly preserved sample.



# Contacts - CAP

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# THANK YOU

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