



# IN-COMPLIANCE LETTERS



**Alex McSurley and Krister Martinez**  
South District/Wastewater Program  
Florida Department of Environmental Protection

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# WHAT WE LOOK FOR AT DEP

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Permit and compliance schedules.
- Laboratory.
- Sampling.
- Records and reports.
- Facility site review.
- Flow measurement.
- Operations and Maintenance (O&M).
- Effluent Quality.
- Biosolids.
- Groundwater.
- Sanitary Sewer Overflow (SSO) survey.
- Any other violations.





# PERMIT AND COMPLIANCE SCHEDULES

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Is the permit current?
- Is there a compliance schedule or Administrative Order, and has it been followed?
- Was the facility modified in any way from the permit?
- Has the facility been disposing of biosolids in the way specified in the permit?
- How close are you to reaching the 180-day deadline for a permit renewal?



# LABORATORY AND SAMPLING

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Is laboratory certification current?
- Are any buffers and reagents used past their expiration date?
- Are all sampling records required available and done correctly?
- Is calibration/verification being done correctly?
- Are all composite samplers being monitored and calibrated/verified correctly?
  - Is there a National Institute of Standards and Technology certified thermometer in the sample refrigerator?



# RECORDS AND REPORTS

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Are all required documents available to the department?
- Are all records done correctly?
- Are all required documents, certifications or calibrations up to date?
- Are all Discharge Monitoring Reports (DMRs) submitted on time, and are the calculations/transcriptions on them correct?
- Are all reports required by an Administrative Order or compliance schedule submitted timely?



# FACILITY SITE REVIEW

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Headworks:
  - Is there evidence of splashing?
  - Are the handrails and steps to the headworks safe?
  - Is the Return Activated Sludge line properly located, is there evidence of the line splashing?
  - Is there excessive corrosion (air lines, pipes, concrete, bar screens)?
  - Is there structural damage (cracks in concrete, exposed rebar)?
  - How are rags and screenings being collected and disposed of?
  - Is the surge tank being properly aerated?
  - Evidence of leaks?



# AERATION BASINS

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Is there excessive foaming?
- Is the mixed liquor the correct color?
- Are there leaks in the air lines?
- Review recent DMRs and see if any exceedances would indicate a need to adjust aeration.
- Is there evidence of splashing?
- Are both blowers functioning correctly and do they have belt guards?
- Is there structural damage (cracked concrete, exposed rebar)?
- Is the electrical box circuitry protected?





# CLARIFIER

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Is there trash, excessive algae or solids in the clarifier?
- Is the weir in working order?
- Is the skimmer functional?
- Is the sludge pump operational?
- Is the weir level?
- Is there evidence of short circuiting
- Are there pop-ups in the clarifier?
- Are there signs of structural damage (exposed rebar, cracked concrete)?
- Is the sludge blanket healthy?
  - What level is it maintained at?



# SPOT THE DEFICIENCY

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# CHLORINE CONTACT CHAMBER

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Is the chlorine stored in the proper container?
- Is the peristaltic pump functional, is the chlorine line in good shape?
- Are you chlorinating in accordance with the method specified in the permit?
- Is the chlorine contact chamber full of biosolids or trash?
- Is there evidence of short circuiting?
  - Are you hitting 15 minutes of contact time?
- Is there evidence of leaks or structural damage (cracks in concrete, exposed rebar)?
- Are you meeting minimum total residual chlorine limits?



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# OTHER CONSIDERATIONS FOR FACILITY SITE REVIEW

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Are any Reduced Pressure Zones on the facility or lift station certified, with the tags attached and the records on hand?
- Is there an adequate inventory of spare parts on hand?
- Is the disposal site adequately maintained?
- Is the disposal site properly inaccessible to the public, if required?
- Is the flow meter accessible?
- Is it in the permitted location?
- Is the flow meter calibration up to date?



# LIFT STATIONS

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Is the audio/visual alarm functional?
- Is the lift station inaccessible to the public?
- Do both pumps work correctly?
- Do the check valves on both pumps work correctly?
- Is the electrical box adequately protected?
- Is the emergency contact signage adequate?
- Is the lift station protected against inflow and infiltration?
- Is there a Reduced Pressure Zone on any potable waterlines?
- Are the floats in good shape?
- Is the valve box/dry well free of standing water and excessive corrosion?



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# OPERATIONS AND MAINTENANCE (O&M)

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Does the facility have an up-to-date O&M manual for both the Wastewater Treatment Plant and collection system?
- Does the facility have a hard bound logbook with consecutive page numbering?
- Is there an inflow and infiltration problem that would cause collection system and/or operational issues?





# EFFLUENT QUALITY AND DISPOSAL

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Are there effluent exceedances, if so, are they chronic?
  - When there are exceedances, are there operator comments on the DMR giving context to the exceedances?
  - When exceedances occur, what steps are taken to prevent them in the future?
  - Does the effluent look as clean as effluent is supposed to look (not turbid, foul smelling and no solids present)?
- Is discharge location as per permit?
  - Are advisory signs in English and Spanish in areas where non-potable Public Access Reuse water is being applied (Part III, VII)?
    - If not public access reuse, are there still signs that accurately convey the nature of the disposal area around its boundaries?
  - Are the disposal sites free from excessive vegetation and sludge?



# BIOSOLIDS

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Are the biosolids being disposed of as per permit?
- Is there evidence of tracking of biosolids off site?
- Are the most recent hauling slips available on site?
  - The past five years of hauling slips are required to be maintained on-site for review.
- Are biosolids being reported accurately in DMRs?
  - Landfilled vs transferred.
  - Gallons vs dry tons.



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# MONITORING WELLS

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Are the wells labeled in accordance with the permit?
- Are the concrete pads in good condition (no cracks or overgrowth of plants)?
- Are the wells locked?
- Are there groundwater exceedances?
  - If so, which wells and in comparison, to the background, and are these exceedances chronic?



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# GROUNDWATER

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Are there groundwater exceedances?
- If there are exceedances, how are they in comparison to the background wells?
  - Does the facility need to submit a permit revision application to adjust parameter limits or change their groundwater monitoring plan?
  - Is there an actual issue caused by effluent land application?
- Are Groundwater DMRs being submitted to the department timely and correctly?
- Is the Facility properly reporting water level relative to National Geodetic Vertical Datum rather than static depth to water on Part D DMRs?
  - This requires you to be aware of the surveyed elevation at the top of casing.



# SSO SURVEY

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

- Does the facility have an up-to-date Sanitary Sewer Overflow Response Plan (SSORP)/Emergency Response Plan(ERP)?
  - Does it include bacteriological sampling for spills reaching surface waters?
  - Does it address security including cyber security?
  - Does it address storm preparedness and response?
- Does the facility have a map of its collection system?
- Are both the map and SSORP/ERP immediately available in the event of an incident, including power outages?
- Is preventative maintenance being performed?
- If spills do occur, is the department being notified in the acceptable timeframe?
- If spills do hit surface water, does the facility correctly conduct bacteriological sampling as outlined in its SSORP/ERP?



# THANK YOU

**Alex McSurley, Sam Walch and Krister Martinez**  
South District/Wastewater Program  
Florida Department of Environmental Protection

Contact Information:

Alex McSurley – 239-344-5679

Sam Walch – 239-344-5647

Krister Martinez – 239-344-5687

[Sam.Walch@FloridaDEP.gov](mailto:Sam.Walch@FloridaDEP.gov)

[Alex.McSurley@FloridaDEP.gov](mailto:Alex.McSurley@FloridaDEP.gov)

[Krister.Martinez@FloridaDEP.gov](mailto:Krister.Martinez@FloridaDEP.gov)



