

CleanConnections

Raise Your Awareness of Significant Non-Compliance

When receiving a violation do you ever stop to wonder if it has put you in Significant Non-Compliance (SNC)? When an industrial user (IU) becomes SNC, that IU is then subject to additional requirements. By becoming aware of and familiar with Significant Non-Compliance, IUs may avoid this possibility.

Whenever an industrial user (IU) receives a violation there is chance that they have reached Significant Non-Compliance status. How do you know if you are in danger? According to Rule 62-625.500(2)(b) of the Florida Administrative Code there are 8 conditions that lead to an SNC status. These conditions are described fully in JEA's Industrial Pretreatment Regulation.

The three most common criteria are:

1. Any required report that is more than 30 days late will result in SNC.
2. Chronic Significant Noncompliance (CSNC) deals with wastewater discharge limit violation frequency. This happens when 66 percent or more of the total samples taken in a six month period for a pollutant parameter exceed the permit discharge limits.

Example:

From January through June an IU takes 6 samples for mercury with 3 of those samples testing above the limit. This IU would not be in SNC because only 50% of the samples exceeded the limit.

3. Technical Review Criteria Significant Noncompliance (TRCNC) deals with the severity of the exceedances of a wastewater discharge limit. In these cases it only takes 33 percent or more of the violations to trigger a TRC significant noncompliance. To get the TRC value the parameter limit is multiplied by a factor 1.4 for conventional pollutants (like SGT-HEM) and 1.2 for nonconventional pollutants (metals and organics). pH violations are not calculated for this category.

Example:

Using the example above, the limit for mercury is 0.006 mg/L. The TRC level would therefore be: $0.006 \text{ mg/L} \times 1.2 = 0.0072 \text{ mg/L}$. Remember 6 samples were taken while 3 resulted in violations. Let's say that the results for the three violations were 0.008 mg/L, 0.0075 mg/L and 0.011 mg/L. Since all three (50% of the samples) exceeded the TRC limit, the industry is in TRCSNC.

Important SNC Precautions

SNC also apply to monthly average discharge limits. Monthly average limit violations can very easily become SNC since there are only six opportunities to use for calculations.

Any IU that samples infrequently has a greater chance of becoming SNC. For example, if a pollutant is sampled semi-annually (once every six months) it only takes one exceedance to trigger chronic SNC. Increased sampling can be the key to prevent an industry from becoming classified as SNC.

When an IU is identified as being in SNC, JEA is required to: Publish IUs in SNC annually; report industries in SNC to the Florida Department of Environmental Protection; and develop compliance schedules to install or upgrade treatment technologies or practices to prevent further violations.

JEA queries for SNC quarterly using six month rolling averages (i.e. January through June, April through September, July through December and October through March.). If you have questions or feel there is a possibility of an SNC status for your facility, call your JEA IP contact immediately. We will gladly assist you in running the numbers and advise you of your options.

FIPA: Connecting with IP Professionals to Create Solutions

The Florida Industrial Pretreatment Association (FIPA) is an organization for individuals working in or associated with the Industrial Pretreatment (IP) profession. FIPA acts as a forum for members helping water professionals create innovative, pragmatic and sustainable solutions to challenging industrial pretreatment needs. FIPA integrates wastewater professionals through research and practice, regulators and regulated, across state boundaries and across wastewater disciplines.



Kenneth Nichols and a member of the JEA Industrial Pretreatment

Kenneth Nichols, a Wastewater Supervisor from Millennium Specialty Chemicals in Jacksonville and FIPA member, said this about belonging to FIPA:

"I have had the benefit in my 16 years as a wastewater operator to walk both sides of the fence. I started my career in this field at a municipality and have seen first hand what an industry, when left unchecked, can do to a POTW. Eleven years ago when I got into the industrial side of treatment it was an eye opening experience.

From my experience, I have learned that the majority of regulated industries don't have individuals who fully understand the impact they have on the POTW. The plant operators are not always trained in wastewater treatment, other than their own operation. Getting involved with FIPA would enhance any industrial operator's knowledge and understanding of the whole process of protecting POTW's and receiving streams. By attending the workshops and certification courses, regulated industries get first hand knowledge of why there has to be a local or state pretreatment program and how they work. Also, there are not a lot of places where industry operators get a chance to network with others and share experiences both good and bad. FIPA has given me the opportunity to do this and shown me that pretreatment coordinators are willing to help industry meet compliance when struggling with their operation. When an industry knows the pretreatment regulations and knows there is someone out there willing to help them meet those regulations, it creates an opportunity for a successful relationship, more focused attention on the treatment process and more consistent permit compliance.

In my opinion, FIPA also benefits from having more industrial dischargers as members. During workshop discussions, it can lead to more diverse dialog among attendees on both sides of any issue presented."

To join or learn more about FIPA, visit their website at <http://fipaonline.com/>.

JEA Earns Two Thumbs Up from EPA

JEA was awarded the Environmental Protection Agency's (EPA) 2007 Clean Water Act Recognition Award as the best large industrial pretreatment program in the country. JEA's program was recognized as a cost-effective collaborative approach for regulating industries and commercial businesses that discharge to the sewer system. Utilizing best management practices and pollution prevention strategies, the JEA approach is beneficial to businesses and has demonstrated improvements in the environment.



From L to R: Dan Parnell, Gunar McKendree, Shannon Sprinkle, Gary Christiansen, Jason Compton, Derrick Stamper, Christina Jacobs

Without the continued support and cooperation of our industries, this recognition would not have been possible. Thank you for your outstanding work in pretreatment which benefits everyone within our service area. This is the second time JEA has received an EPA Clean Water Act Award. In 2003, JEA's Buckman Water Reclamation Facility won the first place award for large secondary treatment facilities for their outstanding work in controlling pollution.

EPA's Clean Water Act Recognition Awards for pretreatment programs was established to recognize municipal implementation and enforcement of local pretreatment programs. The goals of the EPA's national awards program for IP facilities include:

1. Encouraging public support of programs that protect the operations of treatment facilities, the health and safety of municipal employees and the public, and
2. Protecting the water quality of the nation's receiving waters, the reuse and recycling of the effluent and sludge

Crying Over Spilt Milk...

Are you the only industry on your block without a spill control plan? The new JEA Accidental Discharge and Slug Control Plans (ADSCP) template was developed to help industries formulate spill control plans.

This template is based upon the Environmental Protection Agency's required elements for industries regulated under the pretreatment program. It is designed to aid industrial users in developing an ADSCP that will help prevent spills of chemicals or slug discharges from entering the sanitary sewer collection system, surface water or storm water systems.

The template provides a simple avenue to establish procedures that will prevent adverse impacts from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

Get your own ADSCP template by visiting the [jea.com](http://www.jea.com) website at this address: <http://www.jea.com/business/services/industrialpre/permits.asp>.

And the Winners are....

In May, JEA hosted its 2007 Industrial Pretreatment Environmental Stewardship luncheon. The goal of the luncheon is to recognize and thank our industrial users for their continued support of the pretreatment program. The goal of pretreatment is to protect JEA's water reclamation facilities and, ultimately, the St. Johns River.



The 2007 Award Winners

Platinum award for outstanding significant industrial user: Anheuser-Busch

Gold award for outstanding non-significant industrial user: CSX- West Yard

Pollution Prevention awards: Millennium Specialty Chemicals and Bacardi Bottling Corp.

Environmental Stewardship awards for 100% compliance in 2006:

Amalie Oil Company
 American Coolair Corp.
 American Technical Ceramics
 Anheuser - Busch, Inc.
 Baptist Medical Center
 Baptist Medical Center South
 Bacardi Bottling Corp.
 Chevron Products, Inc.
 Cintas Corporation
 ClearView Products Southeast
 CSX Transportation WestYard
 CSX Transportation, Inc. - Moncrief Yard
 Florida Rock and Tank Lines, Inc.
 Flowers Baking Co. of Jacksonville, Inc.
 Amrep Groundwater Remediation
 GA Southern and Florida Railway
 GE Service Center
 Jacksonville Coca Cola Bottling Co
 K & G Box
 Kaman Aerospace Corp.
 Kitchens Seafood

Malnove, Inc.
 Mayo Clinic Jacksonville
 Memorial Hospital of Jacksonville
 Metal Container Corp.
 Millennium Specialty Chemicals
 Owens Corning Fiberglass
 Pan-Glo Florida
 Phillips Petroleum Terminal
 Reichhold, Inc
 Rex Packaging
 Smurfit Stone Container Corporation - Tradeport Dr.
 Smurfit-Stone Container Corporation - E 18th St.
 St. Luke's Hospital
 Swisher International
 The Florida Times-Union
 Thermafin Holdings, LLC
 Trend Offset Printing
 Unison Industries, Inc
 Vistakon
 Whitewave, Inc.

Mark your calendars now, the 2008 event will be held on May 8th. Invitations will be sent in April.

Statewide Award presented to Local Industrial Operator

Congratulations to Ken Nichols of the Millennium Specialty Chemicals Corp. in Jacksonville for winning the L.L. Hedgepeth Award. Nichols was recognized for his leadership, dedication and commitment to the industrial wastewater treatment field. The Hedgepeth award is presented each year by the Florida Water Environment Association to the state's outstanding industrial wastewater operator.

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For more information about our program, forms, and past issues, please visit the JEA Industrial Pretreatment Website (<http://www.jea.com/>)