



Florida Department of Environmental Protection

South District Branch Office
2796 Overseas Highway, Suite 221
Marathon, Florida 33050

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Interim Secretary

SENT VIA ELECTRONIC MAIL

July 13, 2015

City of Marathon
c/o Mr. Michael Puto, City Manager
9805 Overseas Highway
Marathon, Florida 33050
Email: putom@ci.marathon.fl.us

Re: Warning Letter
City of Marathon Areas 3, 4, and 5 Wastewater Treatment Plants
FLA642851, FLA550973, and FLA187364
Monroe County

Dear Mr. Puto:

Inspections were conducted at the City of Marathon Facilities on August 19, 2014, April 20, 2015, and June 16, 2015 under the authority of Section 403.061, Florida Statutes (F.S.). During these inspection, possible violations of Chapter 403, F.S., and Chapters 62-600, 62-601, 62-602, and 62-620, Florida Administrative Code (F.A.C.), were observed.

The City of Marathon Area 5 Facility (FLA187364) was first inspected on August 19, 2014. During this inspection, Department personnel noted the following:

- At the time of the inspection, the Facility was operating without a valid permit.
- Safe access was not provided to the Facility and sampling points due to extensive concrete disrepair.
- The Facility Membrane Bio-Reactors (MBRs) were experiencing chronic, low permeability.
- A spill of approximately 20,000 gallons occurred between August 17 and August 18, 2014. According to the operating company, US Water, the spill occurred during a power outage where the generator power transfer shut down the SCADA system, which was the result of an ongoing failure to replace malfunctioning equipment.

On August 22, 2014, Department personnel notified the City via a Compliance Assistance Offer letter that potential violations existed at the Facility and encouraged the City to take corrective action. The potential violations were:

- Operation without a valid permit.
- Failure to provide safe access.

July 13, 2015

- Failure to operate and maintain the Facility in a manner which enables the intended function.
- Release of inadequately treated wastewater.

Department staff met with City of Marathon and Severn Trent Services staff on October 8, 2014, following the beginning of Severn Trent Services operation of the Areas 3, 4, and 5 Facilities on October 1, 2014, and again on December 3, 2014, to discuss deficiencies primarily at the Area 5 Facility as well as collection system concerns in Area 3.

An operating permit, containing corrective action schedules for several of the above-mentioned, potential violations, was issued for the Area 5 Facility on October 24, 2014. On April 20, 2015, a Follow-up Inspection was conducted and resolution of the potential violations was not complete and additional deficiencies were discovered. Specifically, the Department observed:

- Schedules 8 and 9 of the permit, regarding concrete repairs and collection system evaluation were not complete.
- Department Standard Operating Procedures (SOPs) were not followed for the automatic composite samplers and the samplers were not programmed in accordance with the permit.
- MBR cleaning and maintenance was underway but not completed.
- Floating solids were observed in the Chlorine Contact Chambers.
- An aeration recycle pump in aeration basin #1 was inoperable and the power outlet for the influent composite sampler was not operational resulting in that installation of a long extension cord to span the area between the sampler and the vacuum building to an outlet.

On June 15, 2015, a second written Compliance Assistance Offer was issued to the City as part of an agency investigation preliminary to agency action in accordance with Section 120.57(5), F.S.

The City of Marathon Area 3 Facility (FLA642351) was inspected on June 16, 2015. During this inspection, Department personnel noted the following:

- An unauthorized bypass with high potential for water quality or health impacts occurred from March 14, 2015 through May 21, 2015.
- Permit condition VIII(14), which required an evaluation and submittal of a proposed corrective action plan for the Area 3 collection system due to the Department by March 2, 2015, had not been met.
- Department SOPs were not followed for the automatic composite samplers and the samplers were not programmed in accordance with the Permit. Department SOPs for Field Chlorine were also not followed.
- Effluent exceedances to reuse were reported on the March 2015 Discharge Monitoring Report (DMR).
- A planned, unauthorized bypass of filtration and disinfection was observed by Department staff on June 3, 2015.
- Unpermitted and unauthorized use of a mobile centrifuge for sludge dewatering and hauling was determined.

The City of Marathon Area 4 Facility (FLA550973) was inspected on June 16, 2015. During this inspection, Department personnel noted the following:

- An unauthorized bypass with high potential for water quality or health impacts occurred from March 21, 2015 through May 2, 2015.
- A record of annual calibration of the influent flow meter was not available.
- Department SOPs were not followed for the automatic composite samplers and the samplers were not programmed in accordance with the Permit. Department SOPs for Field Chlorine and sample preservation were also not followed.
- Effluent exceedances to reuse were reported on the March and April 2015 DMRs as well as the October and November 2014 DMRs.

Based on the observations of the Department's April 20, 2015, and June 16, 2015, inspections, possible violations may continue to exist:

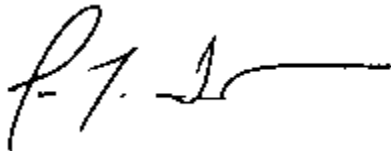
- Failure to operate and maintain the Facility in a manner which enables the intended function.
- Failure to operate in compliance with the Facility permit.
- Failure to comply with Department SOPs.

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Section 403.121, F.S.

Please contact Gus Rios at (305) 289-7081, within **15 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), F.S. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,



Jon M. Iglehart
Director of District Management

DV/DL/GR/JC

ec: Zully Hemeyer, Utilities Director, (hemeyerz@ci.marathon.fl.us)
George Garrett, Planning Director, (garrettg@ci.marathon.fl.us)

INSPECTION REPORT SUMMARY

COMET ENTRY DATE
8/19/2014 3:17:38 PM

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

@ = Optional

WASTEWATER COMPLIANCE INSPECTION REPORT

FACILITY AND INSPECTION INFORMATION

Name and Physical Location of Facility	WAFR ID:	County	Entry Date/Time
City of Marathon Area 5 Little Venice WWTP	FLA187364	Monroe	8/19/2014 9:10:00 AM
506 106th Street Gulf		Phone	@ Exit Date/Time
Marathon, FL 33050		(305) 289-5008	8/19/2014 10:49:00 AM

Name(s) of Field Representatives(s)	Title	Email	Phone
Ron Turner	Lead Operator	ronhelmtturner@gmail.com	305-797-5971
Alex Gajewski	Operations Manager	agajewski@uswatercorp.net	305-394-4393

Name and Address of Permittee or Designated Representative	Title	Phone	@ Operator Certification #
Zully Hemeyer	Utilities Manager	(305) 289-5009	WWC0016064
9805 Overseas Highway	Email		WWC0014428
Marathon, FL 33050	hemeyerz@ci.marathon.fl.us		

Inspection Type:	<input checked="" type="checkbox"/> R <input type="checkbox"/> I <input type="checkbox"/> <input type="checkbox"/>	Samples Taken(Y/N): N	@ Sample ID#:	Samples Split (Y/N): N
<input checked="" type="checkbox"/> Domestic	<input type="checkbox"/> Industrial	Were Photos Taken(Y/N): Y	@ Log book Volume :	@ Page


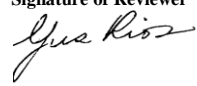
FACILITY COMPLIANCE AREAS EVALUATED

IC: In Compliance; MC: Minor Out of Compliance; NC: Out of Compliance SC: Significant Non-Compliance;
NA: Not Applicable; NE or Blank: Not Evaluated

Significant Non-Compliance Criteria Should be Reviewed When Out of Compliance Ratings Are Given in Areas Marked by a "♦"

	PERMITS/ORDERS		SELF MONITORING PROGRAM		FACILITY OPERATIONS		EFFLUENT/DISPOSAL
SC	1. ♦ Permit	NA	3. Laboratory	NC	6. Facility Site Review	IC	9. ♦ Effluent Quality
NA	2. ♦ Compliance Schedules	NC	4. Sampling	IC	7. Flow Measurement	IC	10. ♦ Effluent Disposal
		IC	5. ♦ Records & Reports	SC	8. ♦ Operation & Maintenance	IC	11. Biosolids/Sludge
						NA	12. Groundwater
NA	14. Other:					NE	13. SSO Survey

Facility and/or Order Compliance Status:	<input type="checkbox"/> In-Compliance	<input type="checkbox"/> Out-Of-Compliance	<input checked="" type="checkbox"/> Significant-Out-Of-Compliance
Recommended Actions:			

Name(s) and Signature(s) of Inspector(s)	District Office/Phone Number	Date
Devon Villareal 	SDB/ (305)289-7070	8/20/14
@ Signature of Reviewer	District Office/Phone Number	Date
	SDB / (305) 289-7081	8/20/14

Facility Name: City of Marathon Area 5 Little Venice WWTP
Inspection Date: 8/19/2014 10:49:00 AM

Single Event Violation Code(s):

Facility Name: City of Marathon Area 5 Little Venice WWTP
Facility ID: FLA187364
Inspection Type: RI
Inspection Date: 8/19/2014 10:49:00 AM

FACILITY BACKGROUND:

Facility Address: 506 106th Street Gulf, Marathon, FL 33050, Monroe County
Program/ Permit Information: DW, permit issue date: 7/13/2009, expiration date: 7/12/2014
Treatment Summary: BNR with MBRs and chlorinated effluent to Class V injection wells or reuse
Permitted Capacity: 0.45 MGD

1. **Permit: RATING – SIGNIFICANT OUT-OF-COMPLIANCE**

- 1.1 Observation: A copy of the permit was onsite and available to plant personnel.
1.2 Observation: An application to renew the existing permit is currently being reviewed by the Department.

1.3 Observation: Deficiency Description: The Permittee failed to submit an application to renew the existing permit at least 180 days prior to expiration.

Additional Comments: A permit renewal reminder letter was issued by the Department to the Permittee on November 13, 2013 stating that the application to renew the permit was due to the Department by January 13, 2014 to be considered timely. A second reminder notice was issued by the Department to the Permittee on March 19, 2014. The application to renew the permit was not received by the Department until June 3, 2014. The application was not complete at the time expiration of the existing permit on July 12, 2014.

Permit/Rule or Other Reference: Florida Administrative Code (F.A.C.) Rule 62-620.410(5) states that an application for renewal of a wastewater permit shall be submitted at least 180 days before the expiration date.

1.4 Observation: Deficiency Description: The facility was operating without a valid wastewater permit.

Additional Comments: The operating permit expired on July 12, 2014. An application to renew the operating permit was not complete by the time of expiration. At the time of the inspection, a new permit had not yet been issued by the Department.

Permit/Rule or Other Reference: F.A.C. Rule 62-4.030 and Section 403.087(1) of the Florida Statutes (F.S.) state that any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, constructed, expanded, or modified without the appropriate and valid permits issued by the Department.

2. **Compliance Schedules:** RATING – NOT APPLICABLE

- 2.1 Observation: No observations were recorded.

3. **Laboratory:** RATING – NOT APPLICABLE

- 3.1 Observation: No observations were recorded.

4. **Sampling: RATING – OUT OF COMPLIANCE**

4.1 Observation: Deficiency Description: Safe access points for obtaining representative effluent samples were not available.

Additional Comments: Chunks of fallen concrete litter from the concrete headworks platform and the concrete blower platform were observed on the Facility grounds under access staircases, on the access staircases, and in close proximity to samplers (see photos).

Permit/Rule or Other Reference: F.A.C. Rule 62-600.400(4)(a) requires that safe access is provided to the Facility and sampling points. In addition, F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

5. **Records and Reports:** RATING – IN COMPLIANCE

5.1 **Observation:** *General* – A copy of the current laboratory certification was available at the time of the inspection (62-620.350(1) F.A.C.).

5.2 **Observation:** *General* – Operators' certification(s) were current and available on-site.

5.3 **Observation:** *General* – The certified operator's daily logbook was complete.

5.4 **Observation:** *General* – Entries in the operator log were clear, concise, informative, and relevant.

6. **Facility Site Review:** RATING – OUT OF COMPLIANCE

6.1 **Observation:** *General* – The facility grounds were secured properly.

6.2 **Observation:** **Deficiency Description:** *General* – The facility grounds were not clean or well maintained.

Additional Comments: The operating company was completing cleanup activities from the 8/17 - 8/18 spill at the time of the inspection. The affected area had been limed. Additional cleaning with a pressure washer and application of additional lime is planned.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(a) prohibits the release of inadequately treated wastewater.

6.3 **Observation:** *General* – Foul odors did not permeate beyond the boundaries of the plant site at the time of the inspection.

6.4 **Observation:** *Alternate Power* – An alternative power source is available at the WWTF.

6.5 **Observation:** **Deficiency Description:** *Alternate Power* – The standby electrical power generator was operational at the time of the inspection.

Additional Comments: The generator is operational however, power transfer problems exist. See Operations and Maintenance section of report.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

6.6 **Observation:** *Alternate Power* – The onsite generator is tested under load on a routine basis

Additional Comments: Every Wednesday from 0700 - 0800.

6.7 **Observation:** *Alternate Power* – A record of testing was available for the onsite generator.

Additional Comments: Operator's log.

6.8 **Observation:** *Headworks* – Screening and grit are being collected in suitable containers.

6.9 **Observation:** *Headworks* – There were no excessive odors emanating from the headworks at the time of the inspection.

6.10 **Observation:** *Headworks* – The bar screen is cleaned on a routine basis.

6.11 **Observation:** *Surge Tanks* – No problems or deficiencies noted.

6.12 **Observation:** *Aeration Basins/Act. Sludge* – No problems or deficiencies noted.

6.13 **Observation:** *Blowers/Motors* – The blower was operational at the time of the inspection.

6.14 **Observation:** *Blowers/Motors* – The blowers were equipped with belt guards.

6.15 **Observation:** *Blowers/Motors* – No problems or deficiencies noted.

6.16 **Observation:** **Deficiency Description:** *Filtration* – Please see specific comment

Additional Comments: The MBRs are experiencing chronic low permeability resulting in an increased frequency in cleaning. This may be due to the polymer entering the Facility when

the mobile centrifuge is onsite dewatering solids and could result in a decreased lifespan of the MBR filters.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

6.17 Observation: *Disinfection* – The chlorine contact chamber was clean and the effluent leaving the plant was clear.

6.18 Observation: *Digestors* – The digestors were free from excessive odors.

6.19 Observation: *Digestors* – The digester was free from excessive foaming.

6.20 **Observation:** **Deficiency Description:** *Digestors* – Please see specific comment

Additional Comments: The digester decant pump failed approximately five months ago. A temporary decant line has been constructed however, it is not adjustable and may not be a hard plumbed solution with a permit revision.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

7. **Flow Measurement:** RATING – IN COMPLIANCE

7.1 Observation: The copy of the flow calibration report is current and satisfactory.

Additional Comments: Calibrated on March 12, 2014.

8. **Operation and Maintenance:** RATING – SIGNIFICANT OUT-OF-COMPLIANCE

8.1 Observation: *General* – A certified operator as required by Rule 62-602 and the Permit, was operating the WWTF.

8.2 **Observation:** **Deficiency Description:** *General* – Failure to replace malfunctioning equipment resulting in a high potential for water quality or health impacts.

Additional Comments: A spill of approximately 20,000 gallons of raw, influent wastewater occurred between Sunday, August 17, 2014 and Monday, August 18, 2014. According to the operating company, a power outage on August 17th, which occurred after the operator had completed staffing for the day, resulted in numerous failures at the Facility. When the power transfers to the backup generator, during an outage or even during weekly tests, it shuts down the SCADA system. The SCADA computer must be manually reset when the generator comes on and when power returns to normal. A backup battery for the SCADA system, which should keep the system in constant power, is not functional. The SCADA system is how the operator receives alarm notices when not present at the Facility. A call did not go out to the operator on August 17th as there was no power to the SCADA system. While the generator provides some power, numerous system errors after the power transfer, which were not reported to the operator through SCADA, did not allow the Facility to continue to operate. Ultimately, the flow equalization tank overflowed discharging untreated wastewater to the Facility grounds though not offsite. According to entries the operator's logbook, this failure has been documented since as far back as September 2012. Further documentation demonstrates that the Permittee has been aware of this problem since at least July 2013.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function. Additionally, F.A.C. Rule 62-600.740(2)(a) prohibits the release of inadequately treated wastewater.

8.3 Observation: *General* – The facility failed to perform maintenance, which resulted in a high potential for water quality or health impacts.

Additional Comments: According to the Facility operator, the onsite backup generator has not been serviced in three years of operation other than routine addition of oil due to specific service required by the manufacturer.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

8.4 Observation: *General* – Please see specific comment

Additional Comments: Rust and corrosion was observed on the plant's exterior surfaces in addition to several areas of crumbling concrete.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

9. **Effluent Quality:** RATING – IN COMPLIANCE

9.1 **Observation:** The final effluent chlorine residual was within the acceptable range.

Additional Comments: Continuous Chlorine Meter reading for TRC = 5.02 mg/L

9.2 **Observation:** A review of the Discharge Monitoring Reports did not reveal any effluent exceedances.

Additional Comments: The current, effluent annual averages are as follows: TSS = 0.91 mg/L, CBOD = 1.10 mg/L, fecal coliform = 0.5 cfu/100 mL, TN = 0.97 mg/L, and TP = 0.28 mg/L.

10. **Effluent Disposal:** RATING – IN COMPLIANCE

10.1 **Observation:** *General* – The facility was discharging at the time of the inspection.

10.2 **Observation:** *General* – The effluent was free from visible sheen at the time of the inspection.

10.3 **Observation:** *General* – The effluent was free from excessive turbidity.

10.4 **Observation:** *General* – The effluent was free from excessive foam.

10.5 Observation: *Reuse* – Please see specific comment

Additional Comments: The reuse diversion valves are not operational according to the operator. There is no assurance that the accumulated effluent in the reuse storage tank meets reuse standards and it must be diverted to the injection wells prior to any reuse being sent out for distribution. At present, this effluent is used for in-plant wash down and mobile centrifuge operations.

10.6 Observation: *Reuse* – Please see specific comment

Additional Comments: There are currently no flow meters for measurement of flow to reuse.

11. **Biosolids/Sludge:** RATING – IN COMPLIANCE

11.1 **Observation:** *General* – Residuals were being disposed of in accordance with the permit.

12. **Groundwater Quality:** RATING – NOT APPLICABLE

12.1 **Observation:** No observations were recorded.

13. **SSO Survey:** RATING – NOT EVALUATED

13.1 **Observation:** No observations were recorded.

14. **Other:** RATING – NOT APPLICABLE

14.1 **Observation:** No observations were recorded.

City of Marathon Area 5 (FLA187364)
Photos by Devon Villareal on
August 19, 2014

I certify that these photos represent the true
on-site conditions observed
and have not been altered in any way.

Devon Villareal



1

A spill of approximately 20,000 gallons of influent wastewater occurred between 1400 on August 17, 2014 and 0800 August 18, 2014. Influent overflowed from the equalization basin to the Facility grounds. Pictures 1 through 15 are of the partially cleaned spill area.



2

There was no discharge offsite. Sludge haulers were used to lower the level in the equalization basin and to pump up pooled wastewater onsite. The area was limed and additional pressure washing and liming was planned.



3



4

City of Marathon Area 5 (FLA187364)
Photos by Devon Villareal on
August 19, 2014

I certify that these photos represent the true
on-site conditions observed
and have not been altered in any way.

Devon Villareal



5



6



7

This photo also contains concrete litter.
Pieces of concrete are breaking off the above
blower platform.



8



9



10

City of Marathon Area 5 (FLA187364)
Photos by Devon Villareal on
August 19, 2014

I certify that these photos represent the true
on-site conditions observed
and have not been altered in any way.

Devon Villareal



11



12



13



14



15

Sludge observed on top on flow equalization tank. Additional cleaning was planned.

City of Marathon Area 5 (FLA187364)
Photos by Devon Villareal on
August 19, 2014

I certify that these photos represent the true
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Devon Villareal



16

Chipped concrete was observed on the blower platform. Pieces of broken concrete observed below in the vicinity of sampling locations.



17

According to the operator, the digester decant pump failed between five and six months ago.



18

A temporary decant line has been installed.



19

The temporary decant line discharges to the fine screen rather than the flow equalization, which is the permitted location.

City of Marathon Area 5 (FLA187364)
Photos by Devon Villareal on
August 19, 2014

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Devon Villareal



20

Chipped concrete was observed on the
headworks platform.



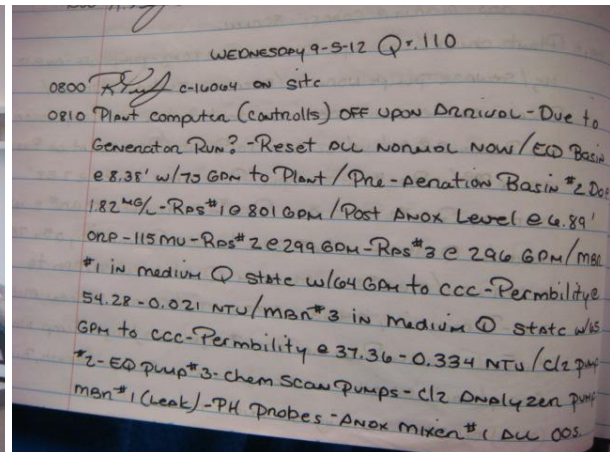
21

Pieces of broken concrete observed on the
access stairs.



22

SCADA System pictured with back up
battery. The back up battery is not functional
at this time and when the Facility switches to
and from generator power, the SCADA
system must be manually restarted (see
inspection report for details).



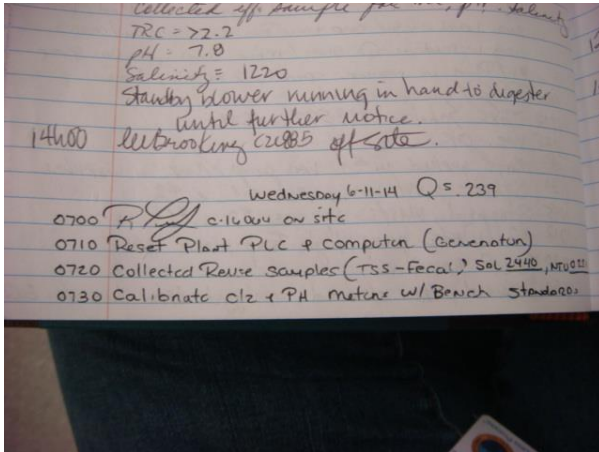
23

Logbook entries dating back to September 5,
2012 document the SCADA power transfer
issue. The logbook entries indicate that the
problem is ongoing.

City of Marathon Area 5 (FLA187364)
 Photos by Devon Villareal on
 August 19, 2014

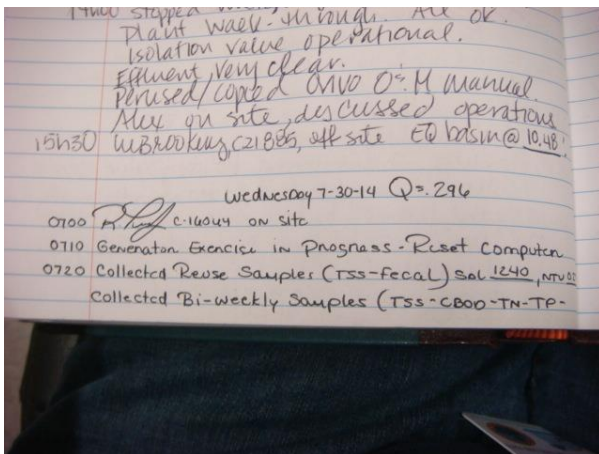
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Devon Villareal



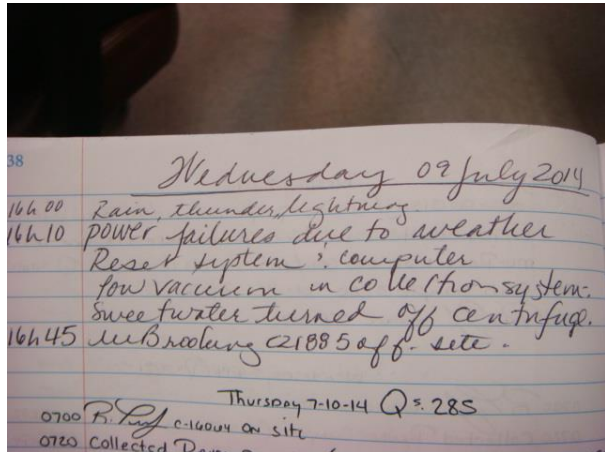
24

Operator entry June 11, 2014 – “Reset Plant
 PLC & computer (Generator).”



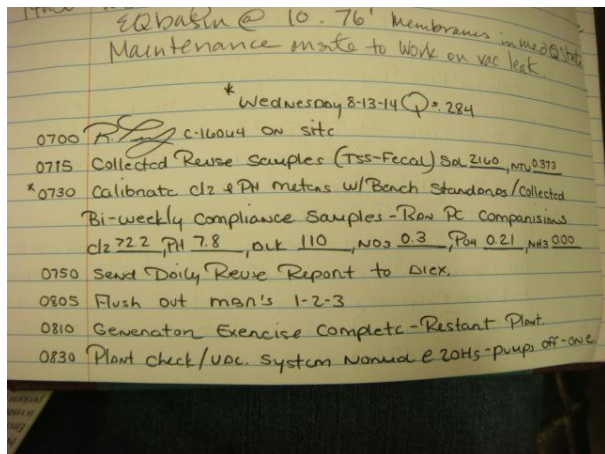
27

July 30, 2014 – “Generator exercise in
 progress – Reset computer.”



25

July 9, 2014 – “Power failure due to weather.
 Reset system & computer.”



28

August 13, 2014 – “Generator exercise
 complete – Restart Plant.”

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WASTEWATER COMPLIANCE INSPECTION REPORT

FACILITY AND INSPECTION INFORMATION

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Name and Physical Location of Facility	WAFR ID:	County	Entry Date/Time
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506 106th Street Gulf		Phone	@ Exit Date/Time
Marathon, FL 33050		(305) 289-5008	4/20/2015 1:58:00 PM
Name(s) of Field Representatives(s)	Title	Email	Phone
Nancy Brooking	Lead Operator	Nancy.Brooking@stservices.com	305-853-6348
Name and Address of Permittee or Designated Representative	Title	Phone	@ Operator Certification #
Michael Puto	City Manager	(305) 289-4130	WWC0021885
9805 Overseas Highway	Email		
Marathon, FL 33050	putom@ci.marathon.fl.us		
Inspection Type:	<input checked="" type="checkbox"/> C <input type="checkbox"/> S <input type="checkbox"/> I	Samples Taken(Y/N): N	@ Sample ID#:
			Samples Split (Y/N): N
<input checked="" type="checkbox"/> Domestic	<input type="checkbox"/> Industrial	Were Photos Taken(Y/N): N	@ Log book Volume :
			@ Page

FACILITY COMPLIANCE AREAS EVALUATED

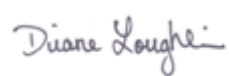
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NC	2. ♦ Compliance Schedules	NC	4. Sampling	IC	7. Flow Measurement	IC	10. ♦ Effluent Disposal
		NC	5. ♦ Records & Reports	NC	8. ♦ Operation & Maintenance	IC	11. Biosolids/Sludge
						IC	12. Groundwater
NA	14. Other:					NE	13. SSO Survey

Facility and/or Order Compliance Status: ☐ In-Compliance ☒ Out-Of-Compliance ☐ Significant-Out-Of-Compliance

Recommended Actions:

Name(s) and Signature(s) of Inspector(s)	District Office/Phone Number	Date
Devon Villareal 	SDB/ (305)289-7070	5/20/15
@ Signature of Reviewer	District Office/Phone Number	Date
Diane Loughlin 	SD/ (239)344-5641	6/10/15

INSPECTION REPORT SUMMARY

Facility Name: City of Marathon Area 5 Little Venice WWTP

Facility ID: FLA187364

Inspection Type: CEI

Inspection Date: 4/20/2015 1:58:00 PM

FACILITY BACKGROUND:

Facility Address: 506 106th Street Gulf, Marathon, FL 33050, Monroe County

Program/ Permit Information: DW, permit issue date: 10/24/2014, expiration date: 10/23/2019

Treatment Summary: BNR with MBRs and chlorinated effluent to Class V injection wells or reuse

Permitted Capacity: 0.45 MGD

1. **Permit:** RATING – IN COMPLIANCE

1.1 **Observation:** A copy of the permit was onsite and available to plant personnel.

2. **Compliance Schedules:** RATING – OUT OF COMPLIANCE

2.1 **Deficiency Description:** The facility failed to meet the schedule in the permit/order.

Additional Comments: Schedules 8 and 9 of the permit have not completed in accordance with the permitted timeframe. A request for an extension, received by the Department on February 3, 2015, did not include an additional amount of time needed. In addition, the timeframes in the permit were provided by the City of Marathon. Given the ongoing safety hazards of the concrete structure, the Department advises completion of the schedule 8 concrete repairs as soon as possible. Correspondence received by the Department on April 24, 2015 indicated that the concrete repair work would commence on April 28th. A site visit of May 19, 2015 revealed that the concrete repairs are still not complete. Results of the evaluation of the collection system had not been finalized at the time of the inspection.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the facility shall be operated in compliance with the permit. Section VI of the permit contains the above-mentioned compliance schedules.

3. **Laboratory:** RATING – NOT APPLICABLE

3.1 **Observation:** No observations were recorded.

4. **Sampling:** RATING – OUT OF COMPLIANCE

4.1 **Deficiency Description:** DEP Standard Operating Procedures were not being followed.

Additional Comments: Neither the influent nor effluent composite sampler collected a sufficient sample aliquot of 100 mL at the time of the inspection.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the facility shall be operated in compliance with the permit. Section IX(17)(e) of the permit states that field activities including onsite tests and sample collection shall follow the applicable standard operating procedures described in DEP-SOP-001/01 adopted by reference in Chapter 62-160, F.A.C. DEP SOP FS 2400. Wastewater Sampling, FS 2430. Wastewater Sampling Techniques, 2. Automatic Samplers, 2.1.1.6. requires, for a flow proportional sample, that the sampler be programmed to collect a minimum of 100 mL for each sample interval, with the interval predetermined based on the flow of the waste stream. Please review DEP SOP FS 2400. Wastewater Sampling.

4.2 **Deficiency Description:** Safe access points for obtaining representative samples were not available.

Additional Comments: The concrete repairs have not occurred at this time and while temporary safety measures have been taken, the site remains unsafe. In addition, the access steps to the influent bar screen are not secured, also providing unsafe access to the site.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.400(4)(a) requires safe access to the facility and sampling points.

4.3 Deficiency Description: Please see specific comment

Additional Comments: Please ensure that a record of composite sampler tubing replacement is documented in the operator's maintenance log. Tubing must be replaced every six months and an equipment blank performed.

Permit/Rule or Other Reference: DEP SOP FS 2400. Wastewater Sampling, FS 2430. Wastewater Sampling Techniques, 2. Automatic Samplers, 2.1.1. recommends replacing the tubing for automatic samplers deployed for extended periods at a minimum of every six months. Further, if there is evidence of loss of elasticity or discoloration or other conditions that would impact the quality of the sample (such as algal growth), or the pumping flow rate, then replace the tubing. 2.1.1.1. Cut the proper length of pre-cleaned tubing. 2.1.1.2. requires collection of equipment blanks each time the tubing is changed or at a frequency of 5% of the tubing changes, whichever is less. Collect a minimum of one blank each year by passing analyte-free water through the equipment that is exposed to the sample. FD 3000. Documentation of Equipment Maintenance, 1. Requires that all maintenance and repairs performed, including routine cleaning procedures, are logged including the calendar date for the procedures performed, record names of personnel performing the maintenance or repair tasks. Designate the identity of specific instrumentation in the documentation with a unique description code for each instrument including manufacturer name, model number, serial number, inventory number, or other unique identification.

4.4 Deficiency Description: Please see specific comment

Additional Comments: The influent and effluent samplers are programmed for an 8 hour time composite. The permit requires an 8 hour flow proportional composite.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the facility shall be operated in compliance with the permit. Section I(A)(1) of the permit requires an 8 hour flow proportional composite.

5. **Records and Reports:** **RATING – OUT OF COMPLIANCE**

5.1 **Observation:** *General* – A copy of the current laboratory certification was available at the time of the inspection (62-620.350(1) F.A.C.).

5.2 **Observation:** *General* – Operators' certifications were current and available on-site.

5.3 **Observation:** *General* – The certified operator's daily logbook was complete.

5.4 **Deficiency Description:** *General* – Two or more Discharge Monitoring Reports (DMRs) were not submitted to the Department within a rolling 6-month period.

Additional Comments: The Biosolids DMR was not submitted with the January or March DMR. The Biosolids DMR must be submitted even if there were no solids transferred or landfilled during that month of operations.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the facility shall be operated in compliance with the permit. Section II(3) of the permit requires that the Biosolids quantities shall be monitored as specified in the permit and the results shall be reported on the monthly Discharge Monitoring Report.

5.5 **Observation:** *General* – Please see specific comment

Additional Comments: Please ensure that the **current** Reuse Operating Protocol is available onsite.

Please Note: A more efficient and paperless alternative to reporting discharge and groundwater monitoring data is available at <http://www.edmr.dep.state.fl.us>.

6. **Facility Site Review: RATING – OUT OF COMPLIANCE**

- 6.1 Observation: *General* – The facility grounds were secured properly.
- 6.2 Observation: *General* – The facility grounds were clean and well maintained.
- 6.3 Observation: *General* – Foul odors did not permeate beyond the boundaries of the plant site at the time of the inspection.
- 6.4 Observation: *AlternatePower* – An alternative power source is available at the WWTF.
- 6.5 Observation: *AlternatePower* – The standby electrical power generator was operational at the time of the inspection.
- 6.6 Observation: *AlternatePower* – The onsite generator is tested under load on a routine basis.
- 6.7 Observation: *AlternatePower* – A record of testing was available for the onsite generator.
- 6.8 Observation: *Headworks* – Screening and grit are being collected in suitable containers.
- 6.9 Observation: *Headworks* – There were no excessive odors emanating from the headworks at the time of the inspection.
- 6.10 Observation: *Headworks* – The bar screen is cleaned on a routine basis.
- 6.11 Observation: *AerationBasins/Act.Sludge* – The contents in the aeration chambers appeared to be adequately mixed.
- 6.12 Observation: *AerationBasins/Act.Sludge* – The air lines to the basins were free from leaks at the time of the inspection.
- 6.13 Observation: *Blowers/Motors* – The blower was operational at the time of the inspection.
- 6.14 Observation: *Blowers/Motors* – The blowers were equipped with belt guards.

6.15 **Deficiency Description:** Filtration – Please see specific comment

Additional Comments: The MBRs continue to experience poor permeability. Intensive cleaning, to be performed by the manufacturer - OVIVO, is scheduled for May 18 - 22, 2015 according to correspondence received from the City of Marathon on April 24, 2015.

Additionally, a temporary patch, due to a previously reported leak, in the exterior wall of MBR #3 will be permanently repaired at that time and preventative maintenance on MBRs #1 and #2 will also be performed to prevent wearing on the tank wall from a weight, which was the cause of the leak from MBR #3. The exterior walls of the MBRs will also be cleaned following the MBR repairs according to the City's April 24th correspondence. A site visit on May 19, 2015 confirmed that the MBR cleaning was underway. MBR #3 was the first unit taken offline. The membranes were removed, cleaned, and in some instances replaced due to extensive damage. MBR #3 was expected to be returned to service on May 20, 2015 and MBR #2 taken offline for cleaning. At the time of the site visit on May 19, 2015, the temporary patch in MBR #3, mentioned above, had not been repaired (see photo log).

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

6.16 **Observation:** *Disinfection* – Floating scum/debris was observed on the surface of the chlorine contact chamber.

Additional Comments: Floating solids were observed in the CCCs during the April 20, 2015 inspection and the May 19, 2015 site visit.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(a) prohibits the release of inadequately treated wastewater.

- 6.17 Observation: *Digestors* – The tank contents in the aerobic digester were well mixed.
- 6.18 Observation: *Digestors* – The digestors were free from excessive odors.
- 6.19 Observation: *Digestors* – The digester was free from excessive foaming.

7. **Flow Measurement:** RATING – IN COMPLIANCE

- 7.1 Observation: The copy of the flow calibration report is current and satisfactory.
Additional Comments: Calibrated on March 4, 2015.

8. **Operation and Maintenance:** RATING – OUT OF COMPLIANCE

- 8.1 Observation: *General* – A certified operator as required by Rule 62-602 and the Permit, was operating the WWTF.

Additional Comments: Nancy Brooking, WWC0021885

- 8.2 Deficiency Description: *General* – The facility failed to perform maintenance, which resulted in a high potential for water quality or health impacts.

Additional Comments: The facility does not maintain a spare parts inventory nor does the facility follow a preventative maintenance schedule. According to the MBR manufacturer, OVIVO, the poor permeability performance of the MBRs is due to a failure to follow the O&M Manual. During the inspection, caustic pump #1 was not operational. Additionally, the aeration recycle pump in aeration basin #1 has been inoperable since October 2014. The power outlet for the influent composite sampler was not functional at the time of the inspection. A long extension cord spans the area from the influent sampler to the vacuum building where it is plugged into an outlet shared with the post-anoxic mixer. The extension cord placement creates a safety hazard and the mixer and sampler cannot run at the same time or the circuit will trip. At the time of a follow up site visit on May 19, 2015, the post-anoxic mixer had failed.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

9. **Effluent Quality:** RATING – IN COMPLIANCE

- 9.1 Observation: The final effluent chlorine residual was within the acceptable range.
9.2 Observation: The final effluent met the minimum/maximum criteria for pH.
9.3 Observation: A review of the Discharge Monitoring Reports did not reveal any effluent exceedances.
Additional Comments: The current effluent annual averages are as follows: TSS = 3.23 mg/L, CBOD = 1.3 mg/L, fecal coliform = 0.5 cfu/100 mL, TN (report only) = 1.72 mg/L, and TP (report only) = 0.30 mg/L.
9.4 Observation: Please see specific comment
Additional Comments: Effluent samples at the time of the inspection yielded the following results: TSS = 18 mg/L, CBOD = 0.89 mg/L, and fecal coliform < 9 cfu/100 mL.

10. **Effluent Disposal:** RATING – IN COMPLIANCE

- 10.1 Observation: *General* – The facility was discharging at the time of the inspection.
10.2 Observation: *General* – The effluent was free from visible sheen at the time of the inspection.
10.3 Observation: *General* – The effluent was free from excessive turbidity.
10.4 Observation: *General* – The effluent was free from excessive foam.
10.5 Observation: *Reuse* – Please see specific comment
Additional Comments: There is no discharge for reuse distribution at this time. Any water sent to the reuse storage tank is used only for centrifuge operations or in plant wash-down. Schedules 1 and 3 of the Permit must be completed prior to discharge to reuse.

11. **Biosolids/Sludge:** RATING – IN COMPLIANCE

- 11.1 Observation: *General* – Residuals were being disposed of in accordance with the permit.

12. **Groundwater Quality:** RATING – IN COMPLIANCE

12.1 Observation: The laboratory detection limits were provided on the ground water monitoring report form.

12.2 Observation: The compliance monitoring wells were being purged properly prior to sampling.

12.3 Observation: A review of the ground water monitoring reports revealed the following violations.

Additional Comments: Exceedances for Total Dissolved Solids, Chlorides, and Total Sulfate were reported on the quarterly groundwater monitoring reports, for Monitoring Well MWC-101909, received April 25, 2014, July 25, 2014 and October 27, 2014. In addition, a fecal coliform exceedance was also reported on the report received October 27, 2014. There is no discharge of reclaimed water from the Facility. The monitoring results are indicative of the background conditions rather than water quality changes due to reuse application as there is not nor has there been application of reclaimed water in the area of MWC-101909. The new permit, issued October 24, 2014, does not contain groundwater monitoring requirements.

13. **SSO Survey:** RATING – NOT EVALUATED

13.1 Observation: No observations were recorded.

14. **Other:** RATING – NOT APPLICABLE

14.1 Observation: No observations were recorded.

City of Marathon Area 5
Wastewater Treatment Plant (FLA187364)
Photos by Devon Villareal on April 20, 2015

I certify that these photos represent the true
on-site conditions observed
and have not been altered in any way.

Devon Villareal



1

At the time of the inspection, caustic pump #1 was inoperable. In addition, corrosion and poor maintenance was observed in each chemical pump housing unit.



2

Temporary pump repair in vacuum hosing.



3

Clean up from vacuum collection tank isolation valve failure, reported to the Department on March 27, 2015.



4

Incomplete concrete repairs.

I certify that these photos represent the true
on-site conditions observed
and have not been altered in any way.

Devon Villareal



5

Incomplete concrete repairs.



6

The outlet for power to the influent sampler
was not operational at the time of the
inspection.



7

A long extension cord (red arrow) has been
connected to an outlet on the exterior of the
vacuum building to power the influent
sampler. The outlet is also serving as the
power source for the post-anoxic mixer (black
arrow). The sampler and mixer cannot
operate at the same time or the outlet will fail
according to the operator.



8

Incomplete concrete repairs over the influent
sampler location.

I certify that these photos represent the true
on-site conditions observed
and have not been altered in any way.

Devon Villareal



9

The influent sampler was programmed for a time composite sample. The Facility permit requires an 8 hour Flow Proportional Composite.



10

The influent sampler did not collect the minimum required 100 mL.



11

The effluent sampler was programmed for a time composite sample. The Facility permit requires an 8 hour Flow Proportional Composite. The effluent sampler also did not collect the minimum required 100 mL.



12

Floating solids were observed in the Chlorine Contact Chambers.

Devon Villareal



13

Floating solids were observed in the Chlorine Contact Chambers.



14

Incomplete concrete repairs. Unsafe access.



15

Extension cord to outlet outside of vacuum building powering the post anoxic mixer.



16

A spill, reported to the Department on March 20, 2015, occurred from MBR #3 on March 19, 2015. Solids remained present on the exterior of the tanks at the time of the inspection.

I certify that these photos represent the true
on-site conditions observed
and have not been altered in any way.

Devon Villareal



17

A temporary repair on the hole in MBR #3, which resulted in the spill, was observed.



18

Evidence of splashing from MBR #3 was observed on the open top of the tank.



19

Evidence of splashing from MBR #1 was observed on the open top of the tank.

iological Analysis Report

SO-DIST-2015-04-21-01

Florida Department of Environmental Protection
Central Laboratory
2600 Blair Stone Road
Tallahassee, FL 32399-2400
DO Accreditation E31 0

Overflow Analyses Performed by:
Flowers Chemical Laboratories Inc.
39 0 Overseas Highway, Suite 103
Marathon, FL 330 0
DO Accreditation E3 34

Event Description: **TSS, CBOD, fecal coliform for secondary WWTP CSI**
Request ID: **RQ-2015-03-02-59**
Customer: **SO-DIST**
Project ID: **CSI**

Send Reports to:
FL Dept. of Environmental Protection
South District Marathon Branch Office
2 96 Overseas Highway, Suite 221
Marathon, FL 330 0
Attn: Devon Villareal

For additional information please contact
David D. Whiting - Administrator
J. Marshall Faircloth - Aquatic Toxicology
Elizabeth Miller - Benthic Biology
Jacqueline Savage - Microbiology
Loretta Wolfe - Molecular Biology
Cheryl Swanson - Taxonomy (Invertebrate & Algal)
Theodore Alathil Chandrasekhar, PhD, QA Officer
Phone (888) 24 - 1

Certified by: Cheryl A. Swanson, Environmental Manager

Date Certified: 11-MA-2015 10:42



NON-CONFORMANCE REPORT INCLUDED

Abbreviations and data remark codes

CERT # - NELAP (National Environmental Laboratory Accreditation Program) Certification Number of the laboratory that performed the analysis.
LCS – Laboratory Control Sample; in the QC Failures column, this notation indicates a batch recovery failure.
MS – Matrix Spike; in the QC Failures column, this notation indicates a batch recovery failure.
RPD – Relative Percent Difference; in the QC Failures column, this notation indicates a batch failure for precision.
CCV – Continuing Calibration Verification; in the QC Failures column, this notation indicates a failure of the calibration verification check sample.
SUR – Surrogate; in the QC Failures column, this notation indicates a recovery failure for the associated surrogate.
RSD – Relative Standard Deviation expressed as a percentage.
SMP – Sample.
** - The laboratory is not NELAP certified for this analyte/method, or certification is not applicable.

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
J - Estimated value and/or the analysis did not meet established quality control criteria
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected. The reported value is the method detection limit for the sample analyzed.
V - Analyte was detected in both sample and method blank.
X - Too few individuals to calculate SCI value.
Y - The laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate
Z - Colonies were too numerous to count (TNTC).

Scientific notation may be used in reporting very large or small values. Values reported using scientific notation will take the form of the following example:
1.3E+03, which is equivalent to 1.3×10^3 or 1300.

Precision is reported as relative percent difference unless otherwise noted.

Uncertainty associated with the analytical results contained in this report can be estimated from the reported quality assurance results and from published test performance acceptance criteria.

Unless otherwise noted, analytical values for soil and sediment samples are reported on a dry weight basis, and analytical values for waste and tissue samples are reported on a wet weight basis.

All sample collection performed by Bureau of Laboratories staff followed the field Standard Operating Procedures adopted by reference in Rule 62-160 FAC unless otherwise noted.

Quality control information from overflow laboratories may not be included in this report. Please refer to the associated report from the overflow laboratory for additional information.

Results for NELAP accredited tests contained in this report meet the requirements specified by the National Environmental Laboratory Accreditation Conference (NELAC). All samples received were in acceptable condition and met NELAC requirements unless otherwise noted. Results generated in this report pertain to the samples collected and submitted for analysis.

All times in this report are adjusted to the applicable Eastern Time Zone (EST or EDT).

ob: TL -201 -04-21-0 roup: Chlorophyll/ rain Size/ OD
ob: TL -201 -04-21-09 roup: Overflow

Sample Location: LITTLE VENICE (AREA 5) WWTP

Collection Date/Time: 04/20/2015 13:00

Field ID: LV042015

Matrix: WATER

Sample ID	Ref. Method	Component	Result	Code	Units	Batch ID	QC Failures
1693491	SM 210	iochemical Oxygen Demand- Day,N-Inhib	0. 9	I	mg/L	P2 391	
1693492	SM 9222 D	Fecal Coliforms-Membrane Filter	9	U	cfu/100 mL		

Ref. Method and Comment:

SM 210 : Laboratory duplicate result is 0.20 U mg/L. Precision data is unavailable due to the small amount of analyte in the C sample.

Non-Conformance Report

NCR ID: 5353

Event(s)

SO-DIST-201 -04-21-01

Job(s)

Sample(s)

Test(s)

NCR Type: SHIPPING/RECEIVING

NCR Category: Receiving

Observation: Collection date and time were not written on the submittal form.

Resolution: Customer Devon Villareal was notified by phone and email. Customer replied by email on 4/22/1 , stating that the samples were collected on 4/20/1 .

Authorised by/Date: athryn olland 4/2 /201

The Non-Conformance Report details exceptions or problems encountered with the events/ obs/samples/test.
Please address questions to:

Chemistry Tim Fitzpatric (0) 24 - 0
iology David D. Whiting (0) 24 - 1

Quality Assurance Report Method Blank Results

Reference Method: SM 5210 B

Batch ID: P283918

Component	Result	Code	Units
iochemical Oxygen Demand- Day,N-Inhib	0.20	U	mg/L

Quality Assurance Report Laboratory Control Sample Accuracy

Reference Method: SM 5210 B

Batch ID: P283918

Component	% Rec.1	% Rec.2	Pass/Fail	Control Limits
iochemical Oxygen Demand- Day,N-Inhib	6.3		P	0 - 96.

Quality Assurance Report Summary

Ref. Method	Analyte	LCS % Recovery	MS % Recovery	LCS	Precision SMP	MS
SM 210	iochemical Oxygen Demand- Day,N-Inhib	6.3				

Reference Method Descriptions

Method / NELAC Cert. #	Description	<u>Associated Samples</u>
SM 210 / E31 0	OD, nitrogen-inhibited (C OD)	1693491
SM 9222 D / E3 34	Fecal coliforms by membrane filter method by FlowersOverflow Laboratory for SD	1693492

Preparation and Analysis Log

Ref. Method	Received Date	Prep Date/Time	Prepared By	Analysis Date/Time	Analyzed By	Associated Samples
SM 210	04/21/201			04/22/201 0 :0	onathan M. Woods	1693491
SM 9222 D	04/20/201			04/20/201 14:	Flowers-Marathon	1693492

Chemical Analysis Report

SO-DIST-2015-04-21-01

Florida Department of Environmental Protection
Central Laboratory
2600 Blair Stone Road
Tallahassee, FL 32399-2400
DO Accreditation E31 0

Event Description: **TSS, CBOD, fecal coliform for secondary WWTP CSI**
Request ID: **RQ-2015-03-02-59**
Customer: **SO-DIST**
Project ID: **CSI**

Send Reports to:
FL Dept. of Environmental Protection
South District Marathon Ranch Office
296 Overseas Highway, Suite 221
Marathon, FL 33060
Attn: Devon Villareal

For additional information please contact
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Colin Wright, Ph.D.
Thejalethil Chandrasekhar, PhD, QA Officer
Phone (904) 241-1000

Certified by: Thejalethil Chandrasekhar, Chemist Administrator Date Certified: 21-APR-2015 12:00



NON-CONFORMANCE REPORT INCLUDED

Abbreviations and data remark codes

CERT # - NELAP (National Environmental Laboratory Accreditation Program) Certification Number of the laboratory that performed the analysis.
LCS – Laboratory Control Sample; in the QC Failures column, this notation indicates a batch recovery failure.
MS – Matrix Spike; in the QC Failures column, this notation indicates a batch recovery failure.
RPD – Relative Percent Difference; in the QC Failures column, this notation indicates a batch failure for precision.
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SUR – Surrogate; in the QC Failures column, this notation indicates a recovery failure for the associated surrogate.
RSD – Relative Standard Deviation expressed as a percentage.
SMP – Sample.
** - The laboratory is not NELAP certified for this analyte/method, or certification is not applicable.

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B - Results based on colony counts outside the acceptable range.
I - The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
J - Estimated value and/or the analysis did not meet established quality control criteria
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
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U - Material was analyzed for but not detected. The reported value is the method detection limit for the sample analyzed.
V - Analyte was detected in both sample and method blank.
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1.3E+03, which is equivalent to 1.3×10^3 or 1300.

Precision is reported as relative percent difference unless otherwise noted.

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Unless otherwise noted, analytical values for soil and sediment samples are reported on a dry weight basis, and analytical values for waste and tissue samples are reported on a wet weight basis.

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All times in this report are adjusted to the applicable Eastern Time Zone (EST or EDT).

Sample Location: LITTLE VENICE (AREA 5) WWTP

Collection Date/Time: 04/20/2015 13:00

Field ID: LV042015

Matrix: WATER

Sample ID	Ref. Method	Component	Result	Code	Units	Batch ID	QC Failures
1693493	SM 2 40 D-9	TSS	1	A	mg/L	P2 3	

Non-Conformance Report

NCR ID: 5353

Event(s)

SO-DIST-201 -04-21-01

Job(s)

Sample(s)

Test(s)

NCR Type: SHIPPING/RECEIVING

NCR Category: Receiving

Observation: Collection date and time were not written on the submittal form.

Resolution: Customer Devon Villareal was notified by phone and email. Customer replied by email on 4/22/1 , stating that the samples were collected on 4/20/1 .

Authorised by/Date: athryn olland 4/2 /201

The Non-Conformance Report details exceptions or problems encountered with the events/ obs/samples/test.
 Please address questions to:

Chemistry Tim Fitzpatric (0) 24 - 0
 iology David D. Whiting (0) 24 - 1

Quality Assurance Report Method Blank Results

Reference Method: SM 2540 D-97

Batch ID: P283878

Component	Result	Code	Units
TSS	2	U	mg/L

Quality Assurance Report Precision

Reference Method: SM 2540 D-97

Batch ID: P283878

Replicated

Lab Sample	Component	% RSD/RPD	Sample/Spike/LCS*	Pass/Fail	Control Limits
1693493	TSS	. 9	Sample	P	0 - 10

Sample, spi e and/or laboratory control sample precision (LCS) is reported.
 Replicate spi e precision may be reported when sample results are below quantifiable levels.

Quality Assurance Report Summary

Ref. Method	Analyte	LCS % Recovery	MS % Recovery	LCS	Precision SMP	MS
SM 2 40 D-9	TSS				. 9	

Reference Method Descriptions

Method / NELAC Cert. #	Description	<u>Associated Samples</u>
SM 2 40 D-9 / E31 0	Total Suspended Solids in aqueous matrices	1693493

Preparation and Analysis Log

Ref. Method	Received Date	Prep Date/Time	Prepared By	Analysis Date/Time	Analyzed By	Associated Samples
SM 2 40 D-9	04/21/201			04/22/201	i ie Li	1693493

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WASTEWATER COMPLIANCE INSPECTION REPORT

FACILITY AND INSPECTION INFORMATION

@ = Optional

Name and Physical Location of Facility City of Marathon Area 4 WWTP behind 5601 Overseas Highway Marathon, FL 33050	WAFR ID: FLA550973	County Monroe Phone (305) 289-5009	Entry Date/Time 6/16/2015 @ Exit Date/Time 6/16/2015
Name(s) of Field Representatives(s) Bobby Bellino	Title Lead Operator	Email bellinob@ci.marathon.fl.us	Phone (305)731-5160
Name and Address of Permittee or Designated Representative Zully Hemeyer 9805 Overseas Highway Marathon, FL 33050	Title Utilities Manager Email hemeyerz@ci.marathon.fl.us	Phone (305) 289-5009	@ Operator Certification # WWC0021394
Inspection Type: <input checked="" type="checkbox"/> C <input type="checkbox"/> E <input type="checkbox"/> I <input type="checkbox"/> I	Samples Taken(Y/N): N	@ Sample ID#:	Samples Split (Y/N):
<input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Industrial	Were Photos Taken(Y/N): N	@ Log book Volume :	@ Page

FACILITY COMPLIANCE AREAS EVALUATED

IC: In Compliance; MC: Minor Out of Compliance; NC: Out of Compliance SC: Significant Non-Compliance;
NA: Not Applicable; NE or Blank: Not Evaluated

Significant Non-Compliance Criteria Should be Reviewed When Out of Compliance Ratings Are Given in Areas Marked by a "♦"

	PERMITS/ORDERS		SELF MONITORING PROGRAM		FACILITY OPERATIONS		EFFLUENT/DISPOSAL
SC	1. ♦ Permit	IC	3. Laboratory	IC	6. Facility Site Review	NC	9. ♦ Effluent Quality
NE	2. ♦ Compliance Schedules	NC	4. Sampling	NC	7. Flow Measurement	IC	10. ♦ Effluent Disposal
		NC	5. ♦ Records & Reports	IC	8. ♦ Operation & Maintenance	IC	11. Biosolids/Sludge
						NE	12. Groundwater
NE	14. Other:					NE	13. SSO Survey

Facility and/or Order Compliance Status: ☐ In-Compliance ☐ Out-Of-Compliance ☒ Significant-Out-Of-Compliance

Recommended Actions:

Name(s) and Signature(s) of Inspector(s) Devon Villareal <i>Devon Villareal</i>	District Office/Phone Number SDB/ (305)289-7075	Date 6/26/15
Gary Hardie	SDB/ (305)289-7074	
@ Signature of Reviewer Diane Loughlin <i>Diane Loughlin</i>	District Office/Phone Number SD/ (239)344-5641	Date 7/9/15

INSPECTION REPORT SUMMARY

Facility Name: City of Marathon Area 4 WWTP

Facility ID: FLA550973

Inspection Type: CEI

Inspection Date: 6/16/15

FACILITY BACKGROUND:

Facility Address: behind 5601 Overseas Highway, Marathon, FL 33050, Monroe County

Program/ Permit Information: DW, permit issue date: 12/23/2014, expiration date: 6/14/2017

Treatment Summary: SBRs with chlorinated effluent to reuse or injection wells

Permitted Capacity: 0.4 MGD

1. **Permit:** **RATING – SIGNIFICANT OUT-OF-COMPLIANCE**

1.1 Observation: *General* – A copy of the permit was onsite and available to plant personnel.

1.2 Deficiency Description: *General* – Unauthorized bypass with a high potential for water quality or health impacts.

Additional Comments: The Facility filters were bypassed from March 21, 2015, to May 2, 2015, due to a failed jet motive pump in SBR #2 and an unavailable spare according to the Abnormal Event Report received by the Department. The bypass was not authorized.

During this time, two effluent Total Suspended Solids (TSS) exceedances were reported on the March 2015 monthly Discharge Monitoring Report (DMR).

Permit/Rule or Other Reference: Florida Administrative Code (F.A.C.) Rule 62-620.610(1) and Section 403.161, Florida Statutes (F.S.) state that the Facility shall be operated in compliance with the permit. Section IX (22)(a) defines “bypass” as the intentional diversion of waste streams from ANY portion of a treatment works. Section IX (22)(b) of the permit states that bypass is prohibited and the Department may take enforcement action against a permittee for bypass unless the permittee affirmatively demonstrates that (1) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and (2) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and (3) The permittee submitted notices as required under Permit Condition IX(22)(c) of the permit. These conditions were not met in the instance of the bypass at the Area 4 WWTP.

2. **Compliance Schedules:** RATING – NOT EVALUATED

2.1 Observation: No observations were recorded.

3. **Laboratory:** RATING – IN COMPLIANCE

3.1 Observation: *General* – The laboratory is certified by the Department of Health.

Additional Comments: Flowers Chemical Laboratories (E83018 and E35834) provides sample analysis.

4. **Sampling:** **RATING – OUT OF COMPLIANCE**

4.1 Deficiency Description: *General* – Effluent composite samples were not being collected proportional to the flow as required by the Permit.

Additional Comments: The effluent composite sampler is not programmed for Flow Proportional Composites (FPC) as required by the permit. Department staff explained that the permit requires an 8-hr FPC and that a manual, FPC, collected in accordance with DEP-SOP-001/01, FS2400 Wastewater Sampling, may be collected until such time that the automatic samplers onsite are connected to the flow meters to allow for a FPC. The operator stated that he will collect a manual 8 hour FPC until such time that the automatic sampler can be programmed for FPCs.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the permit. Sections I(A)(1) and I(B)(1) of the Facility permit require 8-hr FPCs for effluent Total Suspended Solids (TSS), Carbonaceous Biochemical Oxygen Demand (CBOD), Total Nitrogen (TN), and Total Phosphorus (TP).

4.2 Deficiency Description: General – Samples were not preserved properly.

Additional Comments: Samples must be preserved within 15 minutes of the end of the composite.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the Permit. Section IX(18)(e) of the Permit states that field activities, including on-site tests and sample collection, shall follow the applicable Standard Operating Procedures (SOPs) described in DEP-SOP-001/01 adopted by reference in Chapter 62-160, F.A.C. DEP SOP FS2470. Sample Transport and Handling, section 2.3 states that if a large compositing jug is used, preserve samples immediately after sampling has been completed.

4.3 Deficiency Description: General – Field meter(s) was/were not properly calibrated.

Additional Comments: An annual Primary Chlorine Verification has not been performed within the last year.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the Permit. Section IX(18)(e) of the Permit states that field activities, including on-site tests and sample collection, shall follow the applicable Standard Operating Procedures (SOPs) described in DEP-SOP-001/01 adopted by reference in Chapter 62-160, F.A.C. DEP SOP FT 2000. Field Measurement of Residual Chlorine, section 3.2.3.2 requires verification of the Field Chlorine meter with primary standards before first use and at least annually.

4.4 Deficiency Description: General – Please see specific comment

Additional Comments: The intake line tubing for effluent composite sampler was in poor condition at the time of the inspection and should be replaced in accordance with DEP-SOP-001/01, FS2400 Wastewater Sampling. The SOP recommends replacing the tubing every six months or if there is evidence of loss of elasticity, discoloration, or other conditions that would impact the quality of the sample or the pumping flow rate.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the Permit. Section IX(18)(e) of the Permit states that field activities, including on-site tests and sample collection, shall follow the applicable Standard Operating Procedures (SOPs) described in DEP-SOP-001/01 adopted by reference in Chapter 62-160, F.A.C. DEP SOP FS 2400. Wastewater Sampling, FS 2430. Wastewater Sampling Techniques, 2. Automatic Samplers, 2.1.1. recommends replacing the tubing for automatic samplers deployed for extended periods at a minimum of every six months. Further, if there is evidence of loss of elasticity or discoloration or other conditions that would impact the quality of the sample (such as algal growth), or the pumping flow rate, then replace the tubing. 2.1.1.1. Cut the proper length of precleaned tubing. 2.1.1.2. requires collection of equipment blanks each time the tubing is changed or at a frequency of 5% of the tubing changes, whichever is less. Collect a minimum of one blank each year by passing analyte-free water through the equipment that is exposed to the sample. FD

3000. Documentation of Equipment Maintenance, 1. Requires that all maintenance and repairs performed, including routine cleaning procedures, are logged including the calendar date for the procedures performed, record names of personnel performing the maintenance or repair tasks. Designate the identity of specific instrumentation in the documentation with a unique description code for each instrument including manufacturer name, model number, serial number, inventory number, or other unique identification. Please note the equipment blanks required for the parameters analyzed at this Facility include TN and TP (inorganic nonmetallic) in accordance with FQ 1200.

4.5 Observation: *General* – Calibration standards/buffers were within the expiration dates.

4.6 Observation: *General* – Please see specific comment

Additional Comments: The bench sheet for Field Chlorine included the manufacturer's acceptance criteria rather than +/- 10% of standard value acceptance criteria required by the DEP SOPs.

Permit/Rule or Other Reference: DEP SOP FT 2000. Field Measurement of Residual Chlorine, section 3.2.6.2. states that each CCV measurement must be within 10% of the known standard value.

4.7 Observation: *General* – Please see specific comment

Additional Comments: The influent and effluent samplers had calibrated thermometers (which expire on August 22, 2015) and the temperature was <4 degrees C.

5. **Records and Reports: RATING – OUT OF COMPLIANCE**

5.1 Observation: *General* – A copy of the current laboratory certification was available at the time of the inspection (62-620.350(1) F.A.C.).

5.2 Observation: *General* – Operators' certification(s) were current and available on-site.

5.3 Observation: *General* – The certified operator's daily logbook was complete.

5.4 **Deficiency Description: *General* – Discharge Monitoring Reports were not completed properly.**

Additional Comments: On the March 2015 DMR, effluent CBOD results were not reported on Part A for U-001 or R-001 and were not included on Part B of the DMR. In addition, the effluent TSS monthly average was not provided for U-001.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the permit. Section I(C)(8) of the permit requires that the permittee shall complete and submit the DMRs to the Department. The DMR should be completed in accordance with Department Form 62-620.910(10), "Instructions for Completing the Wastewater Discharge Monitoring Report."

Please Note: A more efficient and paperless alternative to reporting discharge and groundwater monitoring data is available at <http://www.edmr.dep.state.fl.us>.

6. **Facility Site Review: RATING – IN COMPLIANCE**

6.1 Observation: *General* – The facility grounds were secured properly.

6.2 Observation: *General* – The facility grounds were clean and well maintained.

6.3 Observation: *General* – Foul odors did not permeate beyond the boundaries of the plant site at the time of the inspection.

6.4 Observation: *AlternatePower* – An alternative power source is available at the WWTF.

6.5 Observation: *AlternatePower* – The onsite generator is tested under load on a routine basis.

6.6 Observation: *AlternatePower* – A record of testing was available for the onsite generator.

6.7 Observation: *Headworks* – Screening and grit are being collected in suitable containers.

6.8 Observation: *Headworks* – The bar screen is cleaned on a routine basis.

6.9 Observation: *AerationBasins/Act.Sludge* – The contents in the aeration chambers appeared to be adequately mixed.

Additional Comments: Three Sequencing Batch Reactors

6.10 Observation: *Blowers/Motors* – The blower was operational at the time of the inspection.

6.11 Observation: *Filtration* – The filter contained sufficient media.

6.12 Observation: *Filtration* – No problems or deficiencies were observed in the filters.

Additional Comments: Anthracite for media replacement was observed onsite.

6.13 Observation: *Disinfection* – The chlorine contact chamber was clean and the effluent leaving the plant was clear.

6.14 Observation: *Digestors* – The tank contents in the aerobic digester were well mixed.

6.15 Observation: *Digestors* – The digestors were free from excessive odors.

6.16 Observation: *Digestors* – The digester was free from excessive foaming.

7. **Flow Measurement: RATING – OUT OF COMPLIANCE**

7.1 Deficiency Description: *General* – Documentation of calibration for the flow meter (or elapsed time meter) was not available at the time of the inspection.

Additional Comments: The effluent flow meter was calibrated by Allen Slater of the FRWA on March 2, 2015 however, according to records available onsite, the ultrasonic, influent flow meter could not be calibrated. The operator stated that repairs to the meter were made however, the meter had not been recalibrated at the time of the inspection.

Permit/Rule or Other Reference: Section I(C)(4) of the permit states that recording flow meters with totalizers shall be utilized to measure flow and calibrated at least once every twelve months in accordance with F.A.C. Rule 62-601.200(17) and .500(6).

7.2 Observation: *General* – Please see specific comment

Additional Comments: The Facility has operated at flows over 50% of the permitted capacity for seven out of the last twelve months. The permitted maximum of 0.400 MGD Annual Average Daily Flow has not been exceeded.

8. **Operation and Maintenance: RATING – IN COMPLIANCE**

8.1 Observation: *General* – The facility was operated and maintained in accordance with the description in the Permit.

8.2 Observation: *General* – A certified operator as required by Rule 62-602 and the Permit, was operating the WWTF.

Additional Comments: Bobby Bellino, WWC0021394

9. **Effluent Quality: RATING – OUT OF COMPLIANCE**

9.1 Observation: *General* – The final effluent chlorine residual was within the acceptable range.

Additional Comments: TRC @ 1636 > 2.20 mg/L, analyzed with DR890 Unit #2

9.2 Deficiency Description: *General* – A review of the Discharge Monitoring Reports revealed the following effluent exceedances.

Additional Comments: Total Suspended Solids (TSS) exceedances to reuse were reported on the March and April 2015 Discharge Monitoring Reports (DMRs). In addition, fecal coliform exceedances to reuse were reported on the October and November 2014 DMRs. The current effluent annual averages are as follows: TSS = 1.7 mg/L, CBOD = 1.8 mg/L, fecal coliform = 0.5 cfu/100 mL, Total Nitrogen (TN) = 1.7 mg/L, and Total Phosphorus (report only) = 1.6 mg/L.

Permit/Rule or Other Reference: Effluent maximums, as defined in Section I(B)(1) of the permit, were exceeded. In addition, F.A.C. Rule 62-600.740(2)(a) prohibits the release of inadequately treated wastewater.

Facility Name: City of Marathon Area 4 WWTP
Inspection Date: 6/16/15

10. **Effluent Disposal:** RATING – IN COMPLIANCE

- 10.1 Observation: *General* – The facility was discharging at the time of the inspection.
- 10.2 Observation: *General* – The effluent was free from visible sheen at the time of the inspection.
- 10.3 Observation: *General* – The effluent was free from excessive turbidity.
- 10.4 Observation: *General* – The effluent was free from excessive foam.

11. **Biosolids/Sludge:** RATING – IN COMPLIANCE

- 11.1 Observation: *General* – Residuals were being disposed of in accordance with the permit.

12. **Groundwater Quality:** RATING – NOT EVALUATED

- 12.1 Observation: *General* – Please see specific comment
Additional Comments: In accordance with Permit FLA550973-004, issued June 15, 2012, Section III, Ground Water Requirements, all piezometers and monitoring wells not part of the approved ground water monitoring plan shall be plugged and abandoned in accordance with Rule 62-532-.500(5), F.A.C., unless future use is intended.

13. **SSO Survey:** RATING – NOT EVALUATED

- 13.1 Observation: No observations were recorded.

14. **Other:** RATING – NOT EVALUATED

- 14.1 Observation: No observations were recorded.

WASTEWATER SIGNIFICANT NONCOMPLIANCE (SNC) DOCUMENTATION

Facility:	<u>City of Marathon Area 4 WWTP</u>	Inspection Date:	<u>6/16/15</u>
Inspector:	<u>D. Villareal</u>	Permit No:	<u>FLA550973</u>
		Permitted Capacity:	<u>0.400</u>

1. Permit

- ☐ Operating without a valid wastewater permit
- ☐ Unpermitted discharge with a high potential for water quality or health impacts
- ☒ Unauthorized bypass with a high potential for water quality or health impacts
- ☐ Unpermitted collection system with a high potential for water quality or health impacts
- ☐ Unauthorized substantial plant modification placed into service
- ☐ Unauthorized residuals or sludge disposal with a high potential for water quality or health impacts

2. Compliance Schedule

- ☐ Start Construction milestone exceeded by 90 days or more
- ☐ End construction milestone exceeded by 90 days or more
- ☐ Attainment of final compliance milestone exceeded by 90 days or more
- ☐ Failure to meet any other enforcement order or compliance schedule milestones by 90 days or more

3. Records and Reports

- ☐ Surface Water Discharge Monitoring Report (DMR) late by 30 or more days
- ☐ Land-Application Effluent Discharge Monitoring Reports – 2 or more non-submittals in 6 mo. window
- ☐ Falsification of any record or report
- ☐ Compliance schedule report or final compliance report late by 30 or more days
- ☐ Pretreatment reports late by 30 or more days

4. Operation and Maintenance

- ☐ Improper operation resulting in a high potential for water quality or health impacts
- ☐ Failure to perform maintenance resulting in a high potential for water quality or health impacts
- ☐ Missing equipment resulting in a high potential for water quality or health impacts
- ☐ Failure to replace malfunctioning equipment resulting in a high potential for water quality or health impacts

5. Effluent

- ☐ Limit exceeded by TRC 2 out of 6 months (TRC Violation)
- ☐ Limit exceeded 4 out of 6 months (chronic effluent violation)
- ☐ Total Residual Chlorine for Disinfection below minimum 10% or more of the time in a rolling 6 month period
- ☐ Persistent acute toxicity through follow up tests
- ☐ Persistent chronic toxicity through follow up tests
- ☐ Pollutant passthrough with a high potential for water quality or health impacts (pretreatment)
- ☐ Any other violation with a high potential for water quality or health impacts

6. Effluent Disposal Method

- ☐ Operation of unauthorized disposal system
- ☐ Disposal system failure with a high potential for water quality or health impacts
- ☐ Failure to operate disposal system as designed with a high potential for water quality or health impacts
- ☐ Unauthorized modification of disposal system placed into service

7. Other Violations

- ☐ Any violation not listed above, or pattern of noncompliance, resulting in a high potential for water quality or health impacts – (Comments or Details supporting SNC finding must be provided.)

Comments/Details:

- ☐ Failure to implement pretreatment program or enforce indirect users where industrial contributions cause effluent limit or disposal violations
- ☐ Any violation considered Significant by Secretary, Deputy Secretary, Director of District Management, or the Division Director

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WASTEWATER COMPLIANCE INSPECTION REPORT

FACILITY AND INSPECTION INFORMATION

@ = Optional

Name and Physical Location of Facility City of Marathon Area 3 WWTP 9805 Overseas Highway Marathon, FL 33050	WAFR ID: FLA642851	County Monroe Phone (305) 289-5009	Entry Date/Time 6/17/2015 @ Exit Date/Time 6/17/2015
Name(s) of Field Representatives(s) Kevin O'Neill	Title Lead Operator	Email cromek2010@yahoo.com	Phone (305) 587-8274
Name and Address of Permittee or Designated Representative Zully Hemeyer 9805 Overseas Highway Marathon, FL 33050	Title Utilities Manager Email hemeyerz@ci.marathon.fl.us	Phone (305) 289-5009	@ Operator Certification #
Inspection Type: <input checked="" type="checkbox"/> C <input type="checkbox"/> E <input type="checkbox"/> I <input type="checkbox"/> I	Samples Taken(Y/N): N	@ Sample ID#:	Samples Split (Y/N):
<input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Industrial	Were Photos Taken(Y/N): Y	@ Log book Volume :	@ Page

FACILITY COMPLIANCE AREAS EVALUATED


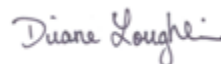
IC: In Compliance; MC: Minor Out of Compliance; NC: Out of Compliance SC: Significant Non-Compliance;
NA: Not Applicable; NE or Blank: Not Evaluated

Significant Non-Compliance Criteria Should be Reviewed When Out of Compliance Ratings Are Given in Areas Marked by a "♦"

	PERMITS/ORDERS		SELF MONITORING PROGRAM		FACILITY OPERATIONS		EFFLUENT/DISPOSAL
SC	1. ♦ Permit	IC	3. Laboratory	IC	6. Facility Site Review	NC	9. ♦ Effluent Quality
NA	2. ♦ Compliance Schedules	NC	4. Sampling	IC	7. Flow Measurement	NC	10. ♦ Effluent Disposal
		NC	5. ♦ Records & Reports	SC	8. ♦ Operation & Maintenance	NC	11. Biosolids/Sludge
						NE	12. Groundwater
NE	14. Other:					NE	13. SSO Survey

Facility and/or Order Compliance Status: ☐ In-Compliance ☐ Out-Of-Compliance ☒ Significant-Out-Of-Compliance

Recommended Actions:

Name(s) and Signature(s) of Inspector(s) Devon Villareal 	District Office/Phone Number SDB/ (305)289-7070	Date 6/18/15
Gary Hardie	SDB/ (305)289-7070	
@ Signature of Reviewer Diane Loughlin 	District Office/Phone Number SD/ (239)344-5641	Date 7/9/15

INSPECTION REPORT SUMMARY

Facility Name: City of Marathon Area 3 WWTP

Facility ID: FLA642851

Inspection Type: CEI

Inspection Date: 6/17/2015

FACILITY BACKGROUND:

Facility Address: 9805 Overseas Highway, Marathon, FL 33050, Monroe County

Program/ Permit Information: DW, permit issue date: 12/23/2014, expiration date: 2/9/2019

Treatment Summary: SBRs with filtration and chlorinated effluent to Class V injection wells or reuse

Permitted Capacity: 0.25 MGD

1. **Permit: RATING – SIGNIFICANT OUT-OF-COMPLIANCE**

1.1 Observation: *General* – A copy of the permit was onsite and available to plant personnel.

1.2 Deficiency Description: *General* – Unauthorized bypass with a high potential for water quality or health impacts.

Additional Comments: The Facility sand filters were bypassed from March 14, 2015 to May 21, 2015 due to "filtration issues" according to the Abnormal Event Report received. The bypass was not authorized. During this time, two effluent fecal coliform exceedances were reported on the monthly Discharge Monitoring Reports (DMRs) on March 24 and 25, 2015 and a Total Residual Chlorine (TRC) level below the permitted minimum of 0.5 mg/L was reported on March 25, 2015. Additionally, four Total Suspended Solids (TSS) violations were also reported on the March DMR for disposal to the reuse storage tank. The filters were also bypassed on November 24, 2014 due to hydraulic overloading according to the Abnormal Event Report.

Permit/Rule or Other Reference: Florida Administrative Code (F.A.C.) Rule 62-620.610(1) and Section 403.161, Florida Statutes (F.S.) state that the Facility shall be operated in compliance with the permit. Section IX (22)(a) defines "bypass" as the intentional diversion of waste streams from ANY portion of a treatment works. Section IX (22)(b) of the permit states that bypass is prohibited and the Department may take enforcement action against a permittee for bypass unless the permittee affirmatively demonstrates that (1) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and (2) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and (3) The permittee submitted notices as required under Permit Condition IX(22)(c) of the permit. These conditions were not met in the instance of the bypass at the Area 3 WWTP.

1.3 Deficiency Description: *General* – Please see specific comment

Additional Comments: Permit revision FLA642851-005, issued January 2, 2015, added permit conditions 10, 11, 12, and 13 to section VIII of permit FLA642851. Condition 12 requires that on or before March 2, 2015, the Permittee shall update and submit its "Blended Reclaimed Water Operating Protocol" dated October 21, 2014, to include the addition of a second backflow preventer and the addition of a return pump station for discarded blended effluent as described in the letter dated December 23, 2014, from Oscar Rubio, P.E. to Gary Maier, P.E. Additionally, Condition 13 requires that on or before March 2, 2015, the Permittee shall submit a PROPOSED CORRECTIVE ACTION PLAN

including a diligent completion schedule to correct the inflow and infiltration of saline water into the collection system. The proposed plan shall be adequate to return the collection system to compliance with Rules 62-604.130(6) and 62-604.500(3), F.A.C. At the time of this report, neither of these permit conditions have been met.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the permit. Permit revision FLA642851-005 required completion of the above-mentioned items by March 2, 2015.

2. **Compliance Schedules:** RATING – NOT APPLICABLE

2.1 **Observation:** No observations were recorded.

3. **Laboratory:** RATING – IN COMPLIANCE

3.1 **Observation:** *General* – The laboratory is certified by the Department of Health.

Additional Comments: Samples analysis is performed by Flowers Chemical Laboratories (E83018 and E35834).

4. **Sampling:** RATING – OUT OF COMPLIANCE

4.1 **Deficiency Description:** *General* – Effluent composite samples were not being collected proportional to the flow as required by the Permit.

Additional Comments: Neither the influent nor effluent composite sampler is programmed for Flow Proportional Composites (FPC) as required by the permit. The operator stated that he is collecting 10, 200 mL samples, three times a day. Department staff explained that the permit requires an 8-hr FPC and that a manual, FPC, collected in accordance with DEP-SOP-001/01, FS2400 Wastewater Sampling, may be collected until such time that the automatic samplers onsite are connected to the flow meters to allow for a FPC.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the permit. Sections I(A)(1), I(B)(1), and I(C)(1) of the Facility permit require 8-hr FPCs for effluent Total Suspended Solids (TSS), Carbonaceous Biochemical Oxygen Demand (CBOD), Total Nitrogen (TN), and Total Phosphorus (TP) as well as influent TSS and CBOD.

4.2 **Deficiency Description:** *General* – Field meter was not properly calibrated.

Additional Comments: Records onsite indicate that the last primary calibration verification for the Field Chlorine meter (DR890) was April 18, 2014.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the Permit. Section IX(18)(e) of the Permit states that field activities, including on-site tests and sample collection, shall follow the applicable Standard Operating Procedures (SOPs) described in DEP-SOP-001/01 adopted by reference in Chapter 62-160, F.A.C. DEP SOP FT 2000. Field Measurement of Residual Chlorine, section 3.2.3.2 requires verification of the Field Chlorine meter with primary standards before first use and at least annually.

4.3 **Observation:** *General* – Calibration standards/buffers were within the expiration dates.

Additional Comments: Department staff notified the operator that the turbidity standards will expire at the end of June 2015.

4.4 **Deficiency Description:** *General* – Please see specific comment

Additional Comments: The intake line tubing for the influent and effluent composite samplers was in poor condition at the time of the inspection and should be replaced in accordance with DEP-SOP-001/01, FS2400 Wastewater Sampling. The SOP recommends replacing the tubing every six months or if there is evidence of loss of elasticity,

discoloration, or other conditions that would impact the quality of the sample or the pumping flow rate.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the Permit. Section IX(18)(e) of the Permit states that field activities, including on-site tests and sample collection, shall follow the applicable Standard Operating Procedures (SOPs) described in DEP-SOP-001/01 adopted by reference in Chapter 62-160, F.A.C. DEP SOP FS 2400. Wastewater Sampling, FS 2430. Wastewater Sampling Techniques, 2. Automatic Samplers, 2.1.1. recommends replacing the tubing for automatic samplers deployed for extended periods at a minimum of every six months. Further, if there is evidence of loss of elasticity or discoloration or other conditions that would impact the quality of the sample (such as algal growth), or the pumping flow rate, then replace the tubing. 2.1.1.1. Cut the proper length of precleaned tubing. 2.1.1.2. requires collection of equipment blanks each time the tubing is changed or at a frequency of 5% of the tubing changes, whichever is less. Collect a minimum of one blank each year by passing analyte-free water through the equipment that is exposed to the sample. FD 3000. Documentation of Equipment Maintenance, 1. Requires that all maintenance and repairs performed, including routine cleaning procedures, are logged including the calendar date for the procedures performed, record names of personnel performing the maintenance or repair tasks. Designate the identity of specific instrumentation in the documentation with a unique description code for each instrument including manufacturer name, model number, serial number, inventory number, or other unique identification. Please note the equipment blanks required for the parameters analyzed at this Facility include TN and TP (inorganic nonmetallic) in accordance with FQ 1200.

4.5 Observation: *General* – Please see specific comment

Additional Comments: The bench sheet for Field Chlorine included the manufacturer's acceptance criteria rather than +/- 10% of standard value acceptance criteria required by the DEP SOPs.

Permit/Rule or Other Reference: DEP SOP FT 2000. Field Measurement of Residual Chlorine, section 3.2.6.2. states that each CCV measurement must be within 10% of the known standard value.

5. **Records and Reports: RATING – OUT OF COMPLIANCE**

5.1 Observation: *General* – A copy of the current laboratory certification was available at the time of the inspection (62-620.350(1) F.A.C.).

Additional Comments: Flowers Chemical Laboratories (E83018 and E35834) are utilized for sample analysis.

5.2 Observation: *General* – Operators' certification(s) were current and available on-site.

5.3 Observation: *General* – The certified operator's daily logbook was complete.

5.4 Deficiency Description: *General* – Discharge Monitoring Reports (DMRs) were not completed properly.

Additional Comments: The monthly average for effluent TSS was not reported on Part A for Monitoring Group U-001 on the April 2015 DMR. In addition, results for TSS at EFB-02, daily sampling for reuse, were not included on Part B of the April 2015 DMR and the monthly max reported on Part A for R-001 is for the TSS result at EFA-02. Also, the annual average for fecal coliform was incorrectly calculated on the March and April 2015 DMRs.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the permit. Section I(C)(8) of the permit requires that the permittee shall complete and submit the DMRs to the Department. The DMR should be completed in accordance with Department Form 62-620.910(10), "Instructions for Completing the Wastewater Discharge Monitoring Report."

5.5 Deficiency Description: General – The Permittee failed to report noncompliance to the Department within 24 hours as required by 62-620.610(20), F.A.C.

Additional Comments: A planned, unauthorized bypass setup was observed by Department staff on June 3, 2015. The bypass was not reported to the Department. See "Operations and Maintenance" section for further details.

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the Permit. Section IX(22) of the permit, as described in item 1.2 above, requires notification, and receipt of Department authorization, for a planned bypass.

5.6 Observation: General – Please see specific comment

Additional Comments: The percent capacity [(Three Month Average Daily Flow/Permitted Capacity) x 100] has exceeded 50% in 9 of the last 12 months of operation. The Annual Average Daily Flow has not exceeded the permitted maximum of 0.250 MGD. City of Marathon staff stated during a meeting on April 21, 2015 that the Area 3 Vacuum Collection System cannot accept any additional connections at this time.

5.7 Observation: General – Please see specific comment.

Additional Comments: Please ensure that the **current** Reuse Operating Protocol is available onsite.

Please Note: A more efficient and paperless alternative to reporting discharge and groundwater monitoring data is available at <http://www.edmr.dep.state.fl.us>.

6. Facility Site Review: RATING – IN COMPLIANCE

6.1 Observation: General – The facility grounds were secured properly.

6.2 Observation: General – The facility grounds were clean and well maintained.

6.3 Observation: General – Foul odors did not permeate beyond the boundaries of the plant site at the time of the inspection.

6.4 Observation: AlternatePower – An alternative power source is available at the WWTF.

6.5 Observation: AlternatePower – The onsite generator is tested under load on a routine basis

6.6 Observation: AlternatePower – A record of testing was available for the onsite generator.

6.7 Observation: Headworks – Screening and grit are being collected in suitable containers.

6.8 Observation: Act.Sludge – The contents in the Sequencing Batch Reactors appeared to be adequately mixed.

Additional Comments: Three Sequencing Batch Reactors. No problems or deficiencies observed or reported at the time of the inspection.

6.9 Observation: Blowers/Motors – The blower was operational at the time of the inspection.

6.10 Observation: Filtration – The filter contained sufficient media.

6.11 Observation: Disinfection – The chlorine contact chamber was clean and the effluent leaving the plant was clear.

7. Flow Measurement: RATING – IN COMPLIANCE

7.1 Observation: General – The copy of the flow calibration report is current and satisfactory.

Additional Comments: The influent and reuse flow meters were calibrated by Florida Rural Water on March 2, 2015.

8. Operation and Maintenance: RATING – SIGNIFICANT OUT-OF-COMPLIANCE

8.1 Observation: General – A certified operator as required by Rule 62-602 and the Permit, was operating the WWTF.

Additional Comments: Kevin O'Neill, WWB0013390. Mr. O'Neill began operating the Facility for the City of Marathon on May 22, 2015 after the end of the City's contract with Severn Trent Services. The Facility was previously operated by Heath Townsend, WWC0022378, from February 18, 2015 through May 22, 2015. Mr. O'Neill also operated the Facility prior to February 18, 2015 for Severn Trent Services and previously, U.S. Water Services Corporation.

8.2 Deficiency Description: General – Improper operation resulting in a high potential for water quality or health impacts.

Additional Comments: On June 3, 2015, Department staff visited the Facility to discuss a bypass observed at the Facility. Upon arrival onsite, a hose was observed from the effluent EQ basin to the outlet of the Chlorine Contact Chambers (CCCs). The mobile centrifuge, operated by Sweetwater, was onsite at the time. The operator, Kevin O'Neill, stated that the pump was set up in the effluent EQ basin to create a bypass of the filters and CCCs should the level in that basin reach 14 feet or more during the centrifuge operations. Mr. O'Neill stated that the filters cannot handle the additional flow generated by the centrifuge dewatering and that the level may exceed 14 feet in the evening hours when the operator is not onsite and the centrifuge is still in operation. Department staff advised that this is not an authorized bypass and that any bypass, planned or unplanned, must be reported to the Department. Mr. O'Neill removed the pump and hosing at the time of the site visit. At the time of the site visit, there was no discharge from the effluent EQ basin to the effluent disposal system as the water level in the basin was well below where the pump was set. Department staff asked Mr. O'Neill if there was any way to document how much flow bypassed the filters and CCCs when he has had this set up in place, which he stated is any time the centrifuge is onsite, and he stated that there was not. Mr. O'Neill also stated that any effluent that bypassed the filters or CCCs would have been discharged to the reuse storage tank rather than the injection wells and that the water in the reuse storage tank does not leave the site but is used for centrifuge operations and in-plant cleaning. Department staff suggested several alternatives to the bypass including hauling of biosolids (avoiding using the centrifuge until such time that the filter capacity is evaluated), changing the hours of centrifuge operation, or shutting the centrifuge down if the level reached a capacity that impacts filters. **Further investigation into the Facility operating permit and revisions issued also revealed that the City is not authorized to use the mobile centrifuge at this Facility. See "Biosolids/Sludge" section of this report.**

Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the Permit. The permit does not allow the use of the mobile centrifuge at this Facility. Additionally, Section IX (22) of the permit, as described in item 1.2 above, requires notification, and receipt of Department authorization, for a planned bypass. Finally, F.A.C. Rule 62-602.650(1), Duties of Operators, requires that domestic wastewater treatment plant operators perform responsible and effective on-site management of the operation, supervision, and maintenance of domestic wastewater treatment plants, including reuse or disposal systems within the operator's responsibility.

8.3 Deficiency Description: General – Improper operation resulting in a high potential for water quality or health impacts.

Additional Comments: On May 26, 2015, the Permittee reported that upon their takeover of the Facility on May 22, 2015 from Severn Trent Services, the City operator found the reuse storage tank full of solids and the auto-diversion to the reuse storage tank disengaged. The operator's Abnormal Event Report is included with this report. The reuse storage tank was cleaned and emptied. Department staff visited the site on May 22, 2015, prior to the City's takeover of operations from Severn Trent Services, and did not note any septic odors or

upset conditions at the time of the site visit. According to the City of Marathon, an abnormal event occurred which was not reported by the former operating company. The City ascertains that none of the inadequately treated wastewater present in the reuse storage tank was discharged offsite.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function. In addition, F.A.C. Rule 62-602.650(1), Duties of Operators, requires that domestic wastewater treatment plant operators perform responsible and effective on-site management of the operation, supervision, and maintenance of domestic wastewater treatment plants, including reuse or disposal systems within the operator's responsibility.

9. **Effluent Quality: RATING – OUT OF COMPLIANCE**

9.1 **Observation:** *General* – Effluent samples were not analyzed.

Additional Comments: Department staff did not collect samples at the time of the inspection.

9.2 **Observation:** *General* – The final effluent chlorine residual was within the acceptable range.

Additional Comments: TRC @ 1041 > 2.20 mg/L analyzed using DR890 Unit #2

9.3 **Deficiency Description:** *General* – A review of the Discharge Monitoring Reports revealed the following effluent exceedances.

Additional Comments: The following effluent exceedances have been reported: Effluent exceedances of greater than 5.0 mg/L for TSS samples collected at EFB-02, disposal to reuse, were reported on March 17, 2015, March 19, 2015, March 24, 2015, and March 25, 2015. Effluent exceedances of greater than 800 cfu/100 mL for effluent fecal coliform at EFA-02, disposal to reuse or injection wells, were reported on March 24 and 25, 2015. TRC results at EFA-02, disposal to injection wells, were reported on March 25 and 26, 2015. Flows exceeding 0.200 MGD were reported on March 12, 2015 and March 26, 2015 and an Abnormal Event Report for "filtration issues" was received by the Department on March 14, 2015 however, there is no explanation on the DMR for these exceedances. The current effluent annual averages, according to Department calculations with reported values, are as follows: TSS = 1.8 mg/L, CBOD = 2.6 mg/L, and fecal coliform = 0.72 cfu/100 mL. The Department annual averages, using data provided from May 1, 2014 through April 30, 2015, are inconsistent with the annual averages provided on the April 2015 DMR. The Facility is not required to meet Advanced Wastewater Treatment standards until January 1, 2016.

Permit/Rule or Other Reference: Effluent maximums, as defined in Sections I(A)(1) and I(B)(1) of the permit, were exceeded. In addition, F.A.C. Rule 62-600.740(2)(a) prohibits the release of inadequately treated wastewater.

10. **Effluent Disposal: RATING – OUT OF COMPLIANCE**

10.1 **Deficiency Description:** *General* – Failure to operate disposal system as designed with a high potential for water quality or health impacts.

Additional Comments: Based on the most recent bypass situation described in the "Operation and Maintenance" section, there is no reasonable assurance at this time that the effluent in the reuse storage tank meets reuse standards due to the bypass of filtration and disinfection. At this time, there is no discharge from the site to the permitted reuse users however, prior to distribution to any external users, the reuse storage tank must be drained, cleaned, and disinfected.

Permit/Rule or Other Reference: F.A.C. Rule 62-600.740(2)(a) prohibits the release of inadequately treated wastewater.

10.2 **Observation:** *General* – The facility was discharging at the time of the inspection.

- 10.3 Observation: *General* – The effluent was free from visible sheen at the time of the inspection.
10.4 Observation: *General* – The effluent was free from excessive turbidity.
10.5 Observation: *General* – The effluent was free from excessive foam.

11. **Biosolids/Sludge:** **RATING – OUT OF COMPLIANCE**

11.1 **Deficiency Description:** *General* – Residuals were not being disposed of in accordance with the Permit.

Additional Comments: The City of Marathon has been utilizing a mobile centrifuge to dewater and haul biosolids from the Area 3 Facility. A comprehensive review of all Area 3 Facility permits, all revisions, and application materials revealed that while the City is authorized to utilize the mobile centrifuge at the Area 4 and 6 Facilities, it is not authorized to use the mobile centrifuge at the Area 3, 5, or 7 WWTPs at this time. Revision FLA642851-006, issued December 23, 2014, allows Biosolids to be transferred to alternate Facilities in the event of emergency but does not authorize the use of the centrifuge. The use of the mobile centrifuge must be ceased until such time that a Professional Engineer evaluates the Facility and applies for a permit modification to utilize the mobile centrifuge.
Permit/Rule or Other Reference: F.A.C. Rule 62-620.610(1) and Section 403.161, F.S. state that the Facility shall be operated in compliance with the Permit. The permit does not allow the use of the mobile centrifuge at this Facility. F.A.C. Rule 62-600.740(2)(c) states that a Facility shall be maintained in a condition which will enable the intended function.

12. **Groundwater Quality:** **RATING – NOT EVALUATED**

12.1 Observation: *General* – Please see specific comment

Additional Comments: In accordance with Permit Revision FLA642851-004, issued March 21, 2014, Section III, Ground Water Requirements, (2), all piezometers and monitoring wells not part of the approved ground water monitoring plan shall be plugged and abandoned in accordance with Rule 62-532-.500(5), F.A.C., unless future use is intended.

13. **SSO Survey:** **RATING – NOT EVALUATED**

13.1 Observation: No observations were recorded.

14. **Other:** **RATING – NOT EVALUATED**

14.1 Observation: *General* – Please see specific comment

Additional Comments: As noted in previous inspection reports, the operator control room/office is within the blower room. Only one access door is providing to the building at this time and hearing protection is not provided outside the building. Staff must pass through the blower room into the office without hearing protection. Hearing protection was also not observed in the office itself. In the event of a fire in the blower room, there is no way to exit the office without going through the blower room.

WASTEWATER SIGNIFICANT NONCOMPLIANCE (SNC) DOCUMENTATION

Facility:	<u>City of Marathon Area 3 WWTP</u>	Inspection Date:	<u>6/16/15</u>
Inspector:	<u>D. Villareal</u>	Permit No:	<u>FLA642351</u>
		Permitted Capacity:	<u>0.250</u>

1. Permit

- ☐ Operating without a valid wastewater permit
- ☐ Unpermitted discharge with a high potential for water quality or health impacts
- ☒ Unauthorized bypass with a high potential for water quality or health impacts
- ☐ Unpermitted collection system with a high potential for water quality or health impacts
- ☐ Unauthorized substantial plant modification placed into service
- ☐ Unauthorized residuals or sludge disposal with a high potential for water quality or health impacts

2. Compliance Schedule

- ☐ Start Construction milestone exceeded by 90 days or more
- ☐ End construction milestone exceeded by 90 days or more
- ☐ Attainment of final compliance milestone exceeded by 90 days or more
- ☐ Failure to meet any other enforcement order or compliance schedule milestones by 90 days or more

3. Records and Reports

- ☐ Surface Water Discharge Monitoring Report (DMR) late by 30 or more days
- ☐ Land-Application Effluent Discharge Monitoring Reports – 2 or more non-submittals in 6 mo. window
- ☐ Falsification of any record or report
- ☐ Compliance schedule report or final compliance report late by 30 or more days
- ☐ Pretreatment reports late by 30 or more days

4. Operation and Maintenance

- ☒ Improper operation resulting in a high potential for water quality or health impacts
- ☐ Failure to perform maintenance resulting in a high potential for water quality or health impacts
- ☐ Missing equipment resulting in a high potential for water quality or health impacts
- ☐ Failure to replace malfunctioning equipment resulting in a high potential for water quality or health impacts

5. Effluent

- ☐ Limit exceeded by TRC 2 out of 6 months (TRC Violation)
- ☐ Limit exceeded 4 out of 6 months (chronic effluent violation)
- ☐ Total Residual Chlorine for Disinfection below minimum 10% or more of the time in a rolling 6 month period
- ☐ Persistent acute toxicity through follow up tests
- ☐ Persistent chronic toxicity through follow up tests
- ☐ Pollutant passthrough with a high potential for water quality or health impacts (pretreatment)
- ☐ Any other violation with a high potential for water quality or health impacts

6. Effluent Disposal Method

- ☐ Operation of unauthorized disposal system
- ☐ Disposal system failure with a high potential for water quality or health impacts
- ☐ Failure to operate disposal system as designed with a high potential for water quality or health impacts
- ☐ Unauthorized modification of disposal system placed into service

7. Other Violations

- ☐ Any violation not listed above, or pattern of noncompliance, resulting in a high potential for water quality or health impacts – (Comments or Details supporting SNC finding must be provided.)

Comments/Details:

- ☐ Failure to implement pretreatment program or enforce indirect users where industrial contributions cause effluent limit or disposal violations
- ☐ Any violation considered Significant by Secretary, Deputy Secretary, Director of District Management, or the Division Director