



Florida Department of Environmental Protection

South District Branch Office
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Marathon, Florida 33050
SouthDistrict@dep.state.fl.us

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

September 16, 2016

Jay Miller, Operations Manager
Florida Keys Aqueduct Authority
1100 Kennedy Drive
Key West, FL 33041-1239
JMiller@fkaa.com

Re: Compliance Assistance Offer
Big Coppitt Wastewater Treatment Plant
FLA567591
Monroe County – DW

Dear Mr. Miller:

A Compliance Evaluation Inspection was conducted at your facility on June 29, 2016. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matter(s).

Specifically, potential non-compliance with the requirements of Chapter 403, Florida Statutes, and Chapter 62-600, Florida Administrative Code was observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the item(s) of concern noted and respond in writing within 15 days of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed,
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the item(s) of concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

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FLA567591
Compliance Assistance Offer
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Please address your response and any questions to Gary Hardie of the South District Marathon Branch Office at (305)289-7074 or via e-mail at Gary.Hardie@dep.state.fl.us. We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer L. Carpenter".

For Jennifer L. Carpenter
Assistant District Director
South District
Florida Department of Environmental Protection

Enclosures: Inspection Report (with attachments)

cc: TWalker@fkaa.com
TKnowles@fkaa.com
SD_CAE_WPR@dep.state.fl.us

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WASTEWATER COMPLIANCE INSPECTION REPORT

FACILITY AND INSPECTION INFORMATION

@ = Optional

Name and Physical Location of Facility	WAFR ID:	County	Entry Date/Time
Big Coppitt WWTP	FLA567591	Monroe	06/29/2016
1100 Kennedy Drive		Phone	Exit Date/Time
Post Office Box 1239		(305)809-2514	06/29/2016
Key West, Florida 33041 - 1239			
Name(s) of Field Representatives(s)	Title	Email	Phone
Teddy Knowles	Lead Operator	TKnowles@fkaa.com	
Name and Address of Permittee or Designated Representative	Title	Phone	Operator Certification #
Jay Miller	Operations Manager	(305)809-2623	
1100 Kennedy Drive	Email		
Key West, Florida 33040	JMiller@fkaa.com		
Inspection Type:	<input type="checkbox"/> C <input type="checkbox"/> E <input type="checkbox"/> I <input type="checkbox"/>	Samples Taken(Y/N): N	@ Sample ID#:
<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
IC	1. ♦ Permit	IC	3. Laboratory	IC	6. Facility Site Review	NC	9. ♦ Effluent Quality
NE	2. ♦ Compliance Schedules	IC	4. Sampling	IC	7. Flow Measurement	IC	10. ♦ Effluent Disposal
		IC	5. ♦ Records & Reports	IC	8. ♦ Operation & Maintenance	IC	11. Biosolids/Sludge
						NA	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
Gary Hardie 	SDB/ (305)289-7074	07/19/2016
Signature of Reviewer	District Office/Phone Number	Date
Diane DiPascale 	SD/ (239)344-5641	09/13/2016

Single Event Violation Code(s):

INSPECTION REPORT SUMMARY

Facility Name: Big Coppitt WWTP

Facility ID: FLA567591

Inspection Type: CEI

Inspection Date: 06/29/2016

FACILITY BACKGROUND:

Facility Address: 1100 Kennedy Drive Post Office Box 1239, Key West, Florida 33041 - 1239, Monroe County

Program/ Permit Information: DW, permit issue date: 11/06/2012, expiration date: 11/05/2017

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

Permitted Capacity: 0.323 MGD

1. **Permit:** RATING – IN COMPLIANCE

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

Additional Comments: The current facility operating permit will expire on November 5, 2017.

1.2 Observation: *General* – Please see specific comment.

Additional Comments: If the facility will continue to operate beyond the effective dates of the permit, an application for renewal should be submitted at least 180 days before expiration.

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

2.1 Observation: *General* – Not Evaluated.

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

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

Additional Comments: Flowers (Altamonte) - E83018; Flowers (Marathon) - E35834

4. **Sampling:** RATING – IN COMPLIANCE

4.1 Observation: *General* – Calibrations were performed correctly.

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

4.3 Observation: *General* – No permittee-conducted sampling was scheduled or performed at the time of the Compliance Evaluation Inspection to make observations and evaluation of sampling procedures and techniques.

4.4 Observation: *General* – Safe and dry access to influent and effluent sampling points are provided.

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

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

Additional Comments: Teddy Knowles - WWA0015282; Teddy Rongey - WWA0006224; Jeremy Miller - 0022875; Danny Price - WWA0015283; Walt Lee - WWC0021628; Robert Gloyd - WWC0021628; Dave Hoffmann - WWC0021622; Edward Roberts - WWC0022970; Kathryn Simmons - WWC0023035; Ryan Mendez - WWB0021093; Stephen Frates - WWC0009207

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

5.3 Observation: *General* – A copy of the current laboratory certification was available at the time of the inspection [62-620.350(1), Florida Administrative Code (F.A.C.)].

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

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

6.6 Observation: *Aeration Basins/Act. Sludge* – The contents in the aeration chambers appeared to be adequately mixed.

6.7 Observation: *Aeration Basins/Act. Sludge* – The air line(s) to the aeration basin was free from leaks at the time of the inspection.

6.8 Observation: *Aeration Basins/Act. Sludge* – The time clock for the aeration system control was operational at the time of the inspection.

6.9 Observation: *Aeration Basins/Act. Sludge* – The RAS line was properly located.

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

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

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

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

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

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

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

7.1 Observation: *General* – The flow measurement device was installed properly.

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

Additional Comments: The inline meters utilized to measure influent (FLW-1), effluent (FLW-2 for U-001), and reuse (FLW-3 for R-001) flows were last calibrated November 2015.

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

8.1 Observation: *General* – The operator is performing treatment plant operation and maintenance duties in a responsible and professional manner.

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

8.3 Observation: *General* – The facility maintains an adequate spare parts inventory.

8.4 Observation: *General* – Please see specific comment.

Additional Comments: During the inspection, FKAA staff was in the process of repairing a decant issue in one of the SBRs. Repairs were completed while Department staff was on site.

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

9.1 Observation: *General* – The effluent appeared clear with an acceptable chlorine residual.

Additional Comments: TRC > 2.20 mg/L at 11:50. Analyzed with DR890 Unit #2.

9.2 Deficiency Description: *General* – A review of the Discharge Monitoring Reports revealed the following effluent exceedance(s).

Additional Comments: The facility reported single grab sample maximum results of 6.8 mg/L in June 2015, 5.2 mg/L in August 2015, and 12.4 mg/L in September 2015 for effluent TSS at monitoring location EFB-1 to R-001. In addition, the facility reported single grab sample maximum results of 2,000.0 colony forming units (cfu)/100 mL in March 2016 for effluent fecal coliform at monitoring location EFA-1 to R-001 and U-001. The facility also reported a single grab sample result of 28.0 cfu/100 mL at EFA-1 to R-001 in April 2016.

The lead operator advised that the facility is designed to automatically divert effluent to the injection wells when TRC drops below 1.0 mg/L for more than eight (8) minutes or if turbidity levels indicate TSS values exceeding reuse requirements. **However, it is unclear whether the effluent was introduced to the reuse system or rejected to the wells.**

Permit/Rule or Other Reference:

F.A.C. Rule 62-600.440(6)(a) states that except as provided in paragraphs 62-600.440(6)(e) and (f), F.A.C., facilities required to provide high-level disinfection shall meet the following criteria (using MF or equivalent MPN methods): 3. Any one sample shall not exceed 5.0 mg/L of TSS at a point before application of the disinfectant.

F.A.C. Rule 62-600.440(6)(b) states that where chlorine is used for disinfection, a total chlorine residual of at least 1.0 mg/L shall be maintained at all times. The minimum acceptable contact time shall be 15 minutes at the peak hourly flow.

F.A.C. Rule 62-600.440(6)(a) states that except as provided in paragraphs 62-600.440(6)(e) and (f), F.A.C., facilities required to provide high-level disinfection shall meet the following criteria (using MF or equivalent MPN methods): 2. Any one sample shall not exceed 25 fecal coliform values per 100 mL of sample. (Discharges to R-001)

Pursuant to F.A.C. Rule 62-600.440(5) and Permit Condition I.A.1., the arithmetic mean of the monthly fecal coliform values collected during an annual period shall not exceed 200 per 100 mL of effluent sample. The geometric mean of the fecal coliform values for a minimum of 10 samples of effluent each collected on a separate day during a period of 30 consecutive days (monthly), shall not exceed 200 per 100 mL of sample. No more than 10 percent of the samples collected (the 90th percentile value) during a period of 30 consecutive days shall exceed 400 fecal coliform values per 100 mL of sample. Any one sample shall not exceed 800 fecal coliform values per 100 mL of sample. (Discharges to U-001)

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

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

Additional Comments: During the inspection, effluent was being diverted to the injection wells due to the upset condition.

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 APPLICABLE

12.1 Observation: *General* – Not Applicable.

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

13.1 Observation: No observations were recorded.

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

14.1 Observation: *General* – Not Applicable.