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**Water and Sewer**  
PO Box 330316 • 3071 SW 38 Avenue  
Miami, Florida 33233-0316  
T 305-665-7471

## VIA ELECTRONIC CORRESPONDENCE

September 29, 2017

CCN: 61354  
File No: 8.DC.52 & 77

Chief, Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
P.O. Box 7611  
Ben Franklin Station  
Washington, D.C. 20044-7611  
RE: DOJ No. 90-5-1-1-4022/1  
[Tom.Mariani@usdoj.gov](mailto:Tom.Mariani@usdoj.gov)

Chief, Clean Water Enforcement Branch  
Water Protection Division  
Attn: Brad Ammons  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303  
[Ammons.Brad@epa.gov](mailto:Ammons.Brad@epa.gov)

Rachael Amy Kamons  
Environmental Enforcement Section  
U.S. Department of Justice  
P.O. Box 7611  
Ben Franklin Station  
Washington, D.C. 20044-7611  
[Rachael.Kamons@usdoj.gov](mailto:Rachael.Kamons@usdoj.gov)

Florida Department of Environmental Protection  
Southeast District – West Palm Beach  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL 33406  
Attn: Compliance/Enforcement Section  
[Jason.Andreotta@dep.state.fl.us](mailto:Jason.Andreotta@dep.state.fl.us)

**RE: Consent Decree (Case: No. 1:12-cv-24400-FAM)**  
**Reference DOJ Case No. 90-5-1-1-4022/1**  
**Section XI, Paragraph 19(i) – Specific Capital Improvement Project**  
**Notification of Completion Letter for Consent Decree Appendix D-2, Capital Improvement**  
**Project 2.24 Central District Wastewater Treatment Plant (CDWWTP) Gas Monitoring**

Dear Sir/Madam:

The purpose of this letter is to notify the United States Environmental Protection Agency (EPA) and Florida Department of Environmental Protection (FDEP) that Miami-Dade County (County) has completed Capital Improvement Project 2.24 CDWWTP Gas Monitoring on September 29, 2017. Attached is the County Plant Personnel Certification of Completion of CD CIP 2.24. (See Attachment A)

In accordance with Section IX, Paragraph 52 of the Consent Decree (CD), on September 19, 2017, the County notified EPA/FDEP of a failure to meet CD compliance date of September 19, 2017, for Appendix D Capital Improvement Project 2.24 Gas Monitoring due to Hurricane Irma.

On September 20, 2017, the County sent EPA/FDEP a Force Majeure Notification Letter for Consent Decree Appendix D-2, Capital Improvement Projects in construction due to Hurricane Irma. It stated, "The County anticipates the delays of up to fourteen (14) days on projects in construction because of Hurricane Irma." Project 2.24 has been completed 10 days past the compliance date of September 19, 2017. The County contends that if not for the Force Majeure event, this project would have been completed by the compliance date.

In addition, the delay duration of the completion of this project past the CD compliance date of September 19, 2017 did not present any immediate endangerment to the public health, welfare or the environment.

Should you have any questions regarding this matter, please call me at (786) 552-8571.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Hardeep Anand, P.E., ENV SP  
Deputy Director, Capital Improvement Programs & Regulatory Compliance

Attachment A: WASD CD CIP 2.24 Certification of Completion

ec: Jonathan A. Glogau  
Special Counsel  
Chief, Complex Litigation  
Office of the Attorney General  
PL-01, The Capitol  
Tallahassee, FL 32399-1050  
850-414-3817  
[Jon.Glogau@myfloridalegal.com](mailto:Jon.Glogau@myfloridalegal.com)

Florida Department of Environmental Protection  
Southeast District – West Palm Beach  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL 33406  
Attn: Compliance/Enforcement Section  
[Lisa.M.Self@dep.state.fl.us](mailto:Lisa.M.Self@dep.state.fl.us)  
[Mike.Bechtold@dep.state.fl.us](mailto:Mike.Bechtold@dep.state.fl.us)  
[Sed.wastewater@dep.state.fl.us](mailto:Sed.wastewater@dep.state.fl.us)

Mayor Carlos A. Gimenez  
Miami-Dade County  
111 NW First Street 29<sup>th</sup> Floor  
Miami, Florida 33128

Lester Sola, Director  
Miami-Dade Water and Sewer Department  
3071 SW 38<sup>th</sup> Avenue  
Miami, Florida 33146

Jack Osterholt, Deputy Mayor/Director  
Miami-Dade Regulatory and  
Economic Resources  
111 NW 1st Street. 29th Floor  
Miami, FL 33128  
[Josterholt@miamidade.gov](mailto:Josterholt@miamidade.gov)

Henry Gillman  
Assistant County Attorney  
Miami-Dade County Attorney's Office  
111 NW First Street Suite 2810  
Miami, Florida 33128

William Bush  
Associate Regional Counsel  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
[Bush.William@epa.gov](mailto:Bush.William@epa.gov)

William A. Weinischke  
Senior Trial Attorney  
Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
P.O. Box 7611  
Washington, D.C. 20044  
[Bill.Weinischke@usdoj.gov](mailto:Bill.Weinischke@usdoj.gov)

ebc:

Antonio Cotarelo  
Douglas L. Yoder  
Bertha Goldenberg  
Josenrique Cueto  
Lynnette M. Ramirez  
Maricela J. Fuentes  
Manuel Moncholi  
Ureaka Wyche  
Frances G. Morris  
Sarah Davis  
Sherry Negahban  
Richard O'Rourke  
Howard Fallon  
Robert Fergen  
Al Galambos  
Dan Edwards  
Rolando Roque  
Juan Bedoya  
Lee N. Hefty (RER-DERM)  
Carlos Hernandez (RER-DERM)  
Rashid Istambouli (RER-DERM)  
David Wood (CD PMCM)  
Andrea Suarez Abastida (CD PMCM)  
Scott Eckler (CD PMCM)  
Abby Diaz (CD PMCM)

**Attachment A**  
**WASD CD CIP 2.24 Certification of Completion**

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Consent Decree PMCM Team  
 135 San Lorenzo | Suite 600  
 Coral Gables, FL 33146  
 (O) 305.444.4691 | (F) 305.447.3580

## Memorandum

To	Daniel Edwards
CC	Manuel Moncholi, Jeff An, David Wood, Abby Diaz, Andres McEwen, Brian Stitt, Jane House, Document Control
Subject	Certification of Completion – CIP 2.24, Gas Monitoring at CDWWTP
From	CD Compliance Reporting
Date	September 29, 2017
Pages	2

In accordance with Section VI, Paragraph 19(i) of the Consent Decree, Specific Capital Improvement Projects (CIP), and Appendix D-2, Schedule of all CIPs, Miami-Dade is required to execute rehabilitation projects to address conditions currently causing SSOs and/or contributing to NPDES permit violations. CIP 2.24, Gas Monitoring at the Central District Wastewater Treatment Plant (CDWWTP), located at 3989 Rickenbacker Causeway, Miami, FL 33149 consists of gas monitoring and alarms in hazardous areas. CIP 2.24 did not conform to the typical activities of a design-bid-build project and required neither the initiation of a permitting nor a procurement phase. Design Consultant prepared an Engineering Assessment Report (EAR) in August 2015 to evaluate the gas monitoring system needs for CDWWTP and off-site Pump Stations 1 and 2. The 2015 EAR provided recommendations to procure and install gas monitoring devices at 17 designated process areas as shown in Table 1 below. The installation of gas monitoring equipment at CDWWTP and Pump Station 1 and 2, CD Appendix D-2 CIP 2.24, was initiated on September 7, 2016 when WASD plant staff ordered gas monitoring equipment and the installation was completed on September 29, 2017 by the in-plant staff.

*Table 1 – Designated Hazardous Areas Equipped with Gas Monitoring*

	Hazardous Area
1	Air Scrubber Building 1 (Headworks)
2	Air Scrubber Building 2 (Headworks)
3	Air Scrubber Building 3 (Sludge Concentrator)
4	Air Scrubber Building 5
5	Cogeneration Building
6	Sludge Digester Control Building - Plant 1 Digester Cluster 1 Control Building
7	Sludge Digester Control Building - Plant 1 Cluster 2 Control Building
8	Sludge Digester Control Building - Plant 2 Cluster 1 Control Building
9	Sludge Digester Control Building - Plant 2 Cluster 2 Control Building
10	Sludge Digester Control Building - Plant 2 Cluster 3 Control Building

Certification of Completion – CD CIP 2.24

Hazardous Area	
11	Sludge Digester Control Building - Plant 2 Cluster 4 Control Building
12	Plant 1 Grit Building (Headworks)
13	Plant 2 Grit Building (Headworks)
14	Pump Station 1 (4th St)
15	Pump Station 2 (9th St)
16	Plant 1 Sludge Concentrator Control Building
17	Plant 2 Sludge Concentrator Control Building

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
David Diffie  
WASD Project Manager