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VIA ELECTRONIC CORRESPONDENCE

February 13, 2018

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U.S. Department of Justice
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RE: DOJ No. 90-5-1-1-4022/1
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West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
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RE: Consent Decree (Case: No. 1:12-cv-24400-FAM)
Reference DOJ Case No. 90-5-1-1-4022/1
Section XI, Paragraph 19(h) — WWTP Operations and Maintenance Program
Hauled Waste Manifest Guidance Manual

Dear Sir/Madam:

Miami-Dade County (County) is in receipt of your request for additional information related to the October 31, 2017 submittal of the Wastewater Treatment Plant Operations and Maintenance Program (WWTPOMP) Hauled Waste Manifest Guidance Manual, prepared pursuant to Section VI – Wastewater Treatment Plant Operations and Maintenance Program, Paragraph 19(h) of the above referenced Consent Decree (CD). Please find below the restatement of the EPA/FDEP comments and the County's responses, clarification, and/or additional information to your questions and/or comments.

- (1) In the November 21, 2016 letter responding to EPA comments, Miami-Dade noted (in its response to comment #9(a) and (b)) that the revised Manual would include a specific certification on the Waste Manifest Monthly Summary Report that would be signed by the hauling management.

The revised Manual stipulates in Section 7.0 that all haulers will use a paper manifest for each load disposed, and on a monthly basis, liquid waste transporters will upload the paper manifest information using a digital system. Other than this monthly upload, there is no mention of a "Monthly Summary Report" in the revised guidance.

Attachment 6 of the revised guidance supplies a sample paper manifest with a certification that is signed by the driver, and not the management of the hauling business. Attachment 6 also includes the 2017 Liquid Waste Transporter Electronic Manifest Guidelines. This guidance includes screen shots of the emanifest system that is used to upload the monthly data. These screen shots suggest the monthly upload procedure does not require/indicate the individual certifying the upload is a manager of the hauling business, and the only certification required is "I certify that the information above is true and accurate" (page 5). This is not the certification that Miami-Dade indicated would be in the guidance in its response to EPA comment #9(a) and (b). The liability burden can still be fully placed on the driver.

The certification language that Miami-Dade had specified in its November 21, 2016 response to comments was included on the Request Form for "Other Liquid Wastes." However, this form does not specify a hauling company manager be the signatory, it only addresses one segment of the hauled wastes being received, and it is for only one disposal and not for each month.

RESPONSE:

Section 7.0 was revised to include the requirement that the LW-ST Operating Permit holder (permittee or authorized manager) must certify/attest that the information uploaded is true and correct and that all discharges comply with applicable local limits. The eManifest system is being updated to include the latter and should be operational for the next operating permits renewal cycle, April 1, 2018. This requirement will be included as a permit condition in the April 2018/2019 permits (effective April 2, 2018).

- (2) In the November 21, 2016 letter responding to EPA comments, Miami-Dade noted (in its response to comment #9(c)) that it would address EPA's concern with non-specification within the manifest form and/or its instructions as to who to contact at the County in order to

obtain approval where the liquid wastes being discharged are other than septage, grease, or portable toilet waste from customers in the County. Miami-Dade responded that it would address this by including such information in the revised Manual.

The revised Manual transmitted on October 31, 2017 does not appear to include such information. With regard to these "Other Liquid Wastes," the revised Manual only references DERM and WASD generally. The hauler of these "Other Liquid Wastes" is directed in the revised Manual to submit a form found in Attachment 5 after first meeting with "RER-DERM staff." This form does not specify who should be the signatory, and also does not identify to whom at Miami-Dade the form should be submitted or how to contact the required staff to meet beforehand.

RESPONSE:

Section 6.0 was revised to include where to submit request, contact information for scheduling pre-submittal meeting and who can sign form.

- (3) In the November 21, 2016 letter responding to EPA comments, Miami-Dade noted (in its response to comment # 10) that training on the Hauled Waste Program will be implemented by July 2017 and repeated on an annual basis. The revised Manual transmitted on October 31, 2017 does not mention the frequency or extent of the training provided in concert with the Hauled Waste Program, except for the one Disposal Facility Spotter, who per Section 8.1 will only be "trained to use a pH meter and explosivity meter," presumably once.

Also, the spotter is required in Section 8.1 to refuse certain types of waste, but the spotter will only know the type of waste if the vehicle sticker says anything other than LW-ST. The spotter is otherwise directed to accept the waste and then watch/monitor it as it is being accepted. How is a spotter supposed to identify if the wasteload (already accepted and being watched) contains all of the listed types of waste with only a pH meter, an explosivity meter, and visual contact? Photo chemicals, certain sludges, and many reactive hazardous wastes, for example, would not be detected with those methods.

RESPONSE:

Section 8.0 was revised to include disposal facility staff training requirements for new employees, monthly "in-service" training, and annual refreshers. Equipment requirements was also revised and linked to waste sampling program results (e.g., random, flagged and facility sampling). As actual sampling data is obtained, equipment requirements will be adjusted.

- (4) Section 3.2 of the revised Manual notes that Miami-Dade will review the compliance history of the permitted hauler on an annual basis. Later, it is noted that DERM and WASD will meet quarterly to discuss disposal station monitoring and POTW incidents. It appears then Miami-Dade may actually review the compliance of a problem hauler more frequently than annually, most likely quarterly. Miami-Dade may want to revise Section 3.2 to factor and/or reference this potential, and may want to identify in the guidance its option to revoke a hauler permit before the renewal process if warranted.

RESPONSE:

Section 3.2 was revised to include ongoing review of transporter compliance, including DERM performing unscheduled inspection of transporters at the disposal facility.

- (5) Section 4.0 of the revised Manual identifies Section 2.0 as the definition of acceptable wastes. The very next section discusses acceptable wastes as well; Miami-Dade may want to reference both Section 2.0 and Section 5.0 in Section 4.0.

RESPONSE:

Section 4.0 was revised accordingly.

- (6) Section 5.0 of the revised Manual notes that transporters hauling waste for disposal to the POTW are not generally required to certify their discharge complies with pretreatment standards found in County Code, such as federal prohibitions and local limits. Since these discharges are non-domestic, they are federally required to meet those pretreatment standards. Miami-Dade is effectively saying that it will not take steps to assure such wastewaters comply with pretreatment standards prior to acceptance, which is a requirement of its authorized pretreatment program; but it will have records (manifests) in place to investigate problems that result when standards are violated. Such partial oversight practices are not acceptable.

RESPONSE:

Section 5.0 and 7.0 were revised so that the LW-ST Operating Permit holder (permittee or authorized manager) must certify/attest that the information uploaded is true and correct and that all discharges comply with applicable local limits.

- (7) Section 8.2.1 of the revised Manual notes that 5% of SVLs daily will be selected for random monitoring. This should be clarified as "5% of unflagged SVLs daily." Wasteloads that are monitored because they are flagged should not be included in the five percent of daily random monitoring events, as this will assure a consistent level of random monitoring. Flagged loads are monitored selectively, not randomly.

RESPONSE:

Section 8.2.1 was revised so that random sampling is 5% of unflagged SVLs (excludes flagged samples).

- (8) Section 8.2.3 of the revised Manual notes that monthly grab samples will be collected after the FOG control equipment, and this data will be provided to DERM before the 15th of the month. This section should be clarified to require variation in the sampling days/times. Since some haulers routinely discharge at the same day of the month, and time of day, assuring variation in the timing of the oversight sample will assure the same discharger conditions are not being sampled each time.

RESPONSE:

Section 8.2.3 was revised to clarify the purpose for this sampling. Given the design of the existing FOG control equipment (i.e., treatment system), it is not possible to correlate the treatment system sampling results with SVLs. Instead, this sampling serves to analyze trends that can be used to make necessary adjustments to sampling, training and equipment requirements.

- (9) Section 9.2 of the revised Manual notes that all incidents at the POTW will be reported to DERM, but does not identify who at WASD will report. Also, the form supplied in Attachment 7 is nonspecific, and not targeted to the Waste Disposal area. Miami-Dade may therefore need to employ two forms - one for non-specific incidents at the POTW, and one for specific incidents related to the Waste Disposal area, so pertinent data for DERM/WASD investigations is collected.

RESPONSE:

Section 9.2 was revised to include who is responsible for reporting and how reporting will be performed.

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.

The above responses serve to clarify the intent of the Hauled Waste Manifest Guidance Manual. Should you have any questions regarding this matter, please call me at (305) 372-6714.

Sincerely,



Carlos L. Hernandez, P.E., P.E., CFM, CEHP, LEED AP, ENV SP
Water & Wastewater Section Chief
Miami-Dade Department of Regulatory and Economic Resources (RER)
Division of Environmental Resources Management (DERM)

Attachments: Revised Hauled Waste Manifest Guidance Manual

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LW-ST^{2.0}

Miami-Dade County
Liquid Waste
Transportation & Disposal
Guidance Manual

Februray 13, 2018



Contents

1.0	Background & Purpose of Guidance Manual.....	3
2.0	Hauled Liquid Waste & Single Vehicle Load (SVL)	5
3.0	Liquid Waste Transporter Permit Application and Renewal.....	6
3.1	New Liquid Waste Transporter Operating Permit Application	6
3.2	Liquid Waste Transporter Operating Permit Renewal.....	7
4.0	Disposal Facilities	8
5.0	Liquid Waste Authorized for Disposal at SDWWTP	8
6.0	Other Hauled liquid waste requiring DERM/MD-WASD Approval	9
6.1	DERM Standards and Limits for Approval.....	10
6.2	WASD Standards and Limits for Approval.....	10
7.0	Reporting Requirements.....	11
8.0	Disposal Facility Monitoring Requirements.....	12
8.1	Disposal Facility Spotter.....	12
8.2	Waste Sampling Programs	13
8.2.1	Random SVL Sampling.....	13
8.2.2	Flagged SVL Sampling.....	13
8.2.3	Septage and FOG Treatment System Sampling	13
9.0	Hauled Waste Coordination & Meetings	14
9.1	Liquid Waste Transporters.....	14
9.2	MD-WASD & DERM.....	15

LW-ST^{2.0} Miami-Dade County Liquid Waste Transportation & Disposal Guidance Manual

Attachments

- Attachment 1 Section 24-46 of the Code, Approved by EPA/FDEP September 7, 2017
- Attachment 2 DERM Liquid Waste Transporter Annual Operating Permit Application & Renewal Application
- Attachment 3 MD-WASD Application
- Attachment 4 DERM & MD-WASD Other Waste Review Flow Chart
- Attachment 5 Other Hauled Waste Disposal Form
- Attachment 6 eManifest System
- Attachment 7 POTW Incident Form

1.0 Background & Purpose of Guidance Manual

Hauled liquid waste generated in Miami-Dade County (MDC), and originating outside of MDC, is regularly disposed of at the MDC Water and Sewer Department's (MD-WASD's) Publicly Owned Treatment Works (POTW) facility, the South District Wastewater Treatment Plant (SDWWTP). This waste consists of wastewater and wastewater bio-solids generated by domestic and non-domestic sources. Chapter 24, MDC Environmental Protection Ordinance (Code), states that liquid waste transported within MDC shall be accomplished by persons with valid Department of Environmental Resources Management (DERM) Liquid Waste Transporters Annual Operating Permits (LW-ST). Requirements for liquid waste transporters are included in Section 24-46 of the Code and future Section 24-42.6 (Approved by FDEP/EPA on September 7, 2017 and pending Board of County Commissioners approval). Section 24-46 of the Code is included below and Section 24-42.6 is included in **Attachment 1**.

<p>Sec. 24-46. Regulation of liquid waste transporters.</p> <ol style="list-style-type: none">(1) It shall be unlawful for any person to permit, cause, allow, let or suffer the transportation within Miami-Dade County of any liquid waste without having a valid liquid waste transporter operating permit issued by the Director or the Director's designee pursuant to Section 24-18.(2) The Director or the Director's designee shall approve, deny, or approve with conditions, limitations or restrictions any application for a liquid waste transporter operating permit. Violations of any permit condition, limitation or restriction shall constitute a violation of the provisions of this chapter. The Director or the Director's designee may suspend or revoke a liquid waste transporter operating permit for failure to comply with any of the provisions of this chapter. The criterion for issuance of the operating permit pursuant to this section is compliance with Chapter 24 of the Code of Miami-Dade County. In addition to the liquid waste transporter operating permit, the Director, or the Director's designee, shall issue numbered stickers which shall be visibly posted on each vehicle permitted to transport liquid waste.(3) All applications for permits issued pursuant to this section shall be on a form prescribed by the Director or the Director's designee and accompanied by a fee which shall be established by administrative order of the County Manager and approved by the Board of County Commissioners. The permit fee payable hereunder shall be deposited in a separate county fund and shall be used exclusively by the Department to pay for the costs of environmental services to and environmental regulation of liquid waste transportation in Miami-Dade County, Florida.(4) All operating permits required by this chapter shall be in addition to any other permits, registrations or occupational licenses which may be required by federal, State or local law. The Director, or the Director's designee, in his or her discretion, may require conditions, limitations or restrictions as part of the operating permit if said conditions, limitations and restrictions are consistent with the requirements of this chapter.(5) Monthly reporting required. All liquid waste transporters shall submit on a monthly basis to the Director or the Director's designee, on a form prescribed by the Department all information required by any conditions, limitations or restrictions which are part of the liquid waste transporter's operating permit.(6) Immediate reporting required. Any liquid waste transporter who causes, permits, lets, allows, or suffers any liquid waste accident, liquid waste spill, or other liquid waste discharge anywhere within the boundaries of Miami-Dade County, shall immediately report the same to the Department.(7) It shall be unlawful for any liquid waste transporter to dump, dispose, throw, drain, run, leak or otherwise discharge, or to allow, cause, permit, let, or suffer to be dumped, disposed, thrown, drained, run, leaked or otherwise discharged any liquid waste or solid waste into a sanitary sewer, any type of manhole, storm sewer, catch basin, french drain, disposal well, soakage pit, solid waste transfer or disposal facility, recycling facility, waste oil facility or similar structure or on to or into the ground, or into any of the waters of this county, or at any other place in Miami-Dade County unless said place is a sewage treatment plant or industrial waste treatment plant or a resource recovery and management facility approved by the Director or the Director's designee to receive said liquid or solid wastes and unless the liquid waste transporter's operating permit authorizes said place for disposal.(8) No person shall utilize a liquid waste transporter unless the liquid waste transporter has a valid operating permit issued by the Director or the Director's designee.(9) The following activities shall be exempt from the provisions of this ordinance:<ol style="list-style-type: none">(a) The on site transportation of liquid waste to a place within the boundaries of a particular facility, location, property or site.(b) The transportation of fully containerized and hermetically-sealed receptacles approved by the State of Florida Department of Transportation, provided said transportation does not commence or end in Miami-Dade County. <p><small>(Ord. No. 04-214, §§ 1, 5, 12-2-04; Ord. No. 08-55, § 2, 5-6-08)</small></p>
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Historically, waste hauled to the SDWWTP primarily consisted of septic tank pump outs. Given the source of the liquid waste hauled, septic tanks, DERM used "ST" as part of the Liquid Waste Transporter permits. This nomenclature (LW-ST) has been retained for all hauled liquid waste that can be disposed of at a POTW facility.

There are six (6) other DERM hauled liquid waste permit categories and these are listed below:

- HW - Hazardous waste
- WO - Waste oil/oily waste water
- RF - Waste radiator fluid
- SR - Waste photo chemicals containing silver
- BW - Bio medical waste
- DA - Sludge from POTW not classified PFRP

This guidance manual does NOT address these permit categories and waste associated with these permit categories shall NOT be hauled to a POTW facility.

This guidance manual was developed to educate waste generators, transporters and disposal facilities on key regulatory requirements contained in Chapter 24 of the Code and key operational requirements for generating, transporting, and disposing of ***Non-Hazardous Liquid Waste*** in a manner that protects POTWs and other disposal facilities. A summary of the key elements used by MDC to accomplish the latter include:

1. DERM and MD-WASD limit the type of waste accepted for disposal at the SDWWTP. Refer to ***Section 2.0***.
2. All waste haulers are permitted by DERM; i.e. only transporters with a DERM Liquid Waste Transporters Annual Operating Permit can haul liquid waste – regardless of disposal facility. Refer to ***Section 3.0***.
3. All hauled waste is manifested. Refer to ***Section 7.0***.
4. MD-WASD monitors incoming waste by performing random sampling and flagging samples that do not meet specific requirements. Refer to ***Section 8.0***.

This guidance manual is not intended to address all operational requirements or all regulatory requirements implemented to safeguard the POTW and other disposal facilities. For additional information contact DERM Pollution Regulation Division at:

Department of Regulatory and Economic Resources
Environmental Resources Management (DERM)
Pollution Regulation Division, 7th Floor
701 NW 1st Court
Miami, Florida 33136
(305) 372-6600

2.0 Hauled Liquid Waste & Single Vehicle Load (SVL)

Hauled Liquid Waste, as defined in this guidance manual and permitted under the LW-ST permit category, includes the following **Non-Hazardous** liquid waste:

1. Sewage and septage from:
 - a. Package sewage treatment plants (e.g. biosolids)
 - b. Sanitary sewer manholes, pump stations, gravity mains, and force mains
 - c. Onsite sewage treatment and disposal systems (e.g. septic and dosing tanks) serving residential and commercial establishments
2. Grey water systems
3. Portable/chemical toilets
4. Grease interceptor contents: Fats, Oils, and Grease (FOG)
5. Storm water (not impacted by petroleum or other waste) from catch basins, storm drains, pump stations, and retention/detention basins.
6. Other waste approved by DERM and the disposal facility subject to the following and specific requirements detailed in **Section 6.0**:
 - a. Waste generated in MDC by facilities permitted by DERM (i.e. facilities with active DERM operating permit).
 - i. Waste characterization requirements are determined based on DERM operational knowledge and if required, additional field inspections.
 - ii. Waste is determined to comply with applicable narrative and numeric standards and limits in Section 24-42.4 of the Code and determined to not interfere with the disposal facility operations and permit limits.
 - b. Waste generated in MDC by facilities not permitted by DERM.
 - i. Complete waste characterization utilizing narrative and numeric standards and limits in Section 24-42.4 of the Code.
 - ii. Waste is determined to comply with narrative and numeric standards and limits in Section 24-42.4 of the Code and determined to not interfere with the disposal facility operations and permit limits.

Wastes that are not mentioned in the list above shall NOT be disposed of at the North, Central, or South District Wastewater Treatment Plants.

Single Vehicle Load (SVL) is defined in this guidance manual as the total waste load contained in a single transport vehicle. Each SVL shall have a unique waste manifest and disposal facility dump ticket. Furthermore, commingling of FOG with other hauled liquid waste is prohibited. That is, SVL loads shall not commingle grease interceptor waste with any other hauled liquid waste. For example, a SVL that contains waste from a food service establishment grease interceptor shall not contain waste from an onsite sewage treatment and disposal system septic tank or dosing tank. Commingling of septage and/or stormwater sources is permitted.

3.0 Liquid Waste Transporter Permit Application and Renewal

All liquid waste transporters engaged in transporting liquid waste in MDC, regardless of the waste's origin or final disposal location, are required to obtain and maintain Liquid Waste Transporters Annual Operating Permits (LW-ST). This requirement applies to:

1. Waste generated outside of MDC and disposed of in MDC.
2. Waste generated in MDC and disposed of in MDC.
3. Waste generated in MDC and disposed of outside of MDC.

The process for obtaining and renewing a liquid waste transporter operating permit are discussed below.

3.1 New Liquid Waste Transporter Operating Permit Application

Prior to transporting liquid waste, a transporter shall obtain a DERM operating permit. The application process begins with the submittal of a Liquid Waste Transporters Annual Operating Permits (LW-ST) Application to DERM. The application can be found at <http://www.miamidade.gov/permits/library/liquid-waste.pdf> and is also included as **Attachment 2**. The completed application shall be submitted with applicable fee to the:

Department of Regulatory and Economic Resources
Environmental Resources Management (DERM)
Pollution Regulation Division, 7th Floor
701 NW 1st Court
Miami, Florida 33136

It is advised that persons applying for a Liquid Waste Transporters Annual Operating Permits (LW-ST) meet with Pollution Regulation Division staff prior to submitting a completed application. The application includes the following:

1. Instructions
2. Permit application Checklist
3. Business/Corporation/owner information
4. Equipment list
5. List of "Type" of facilities served (e.g., Food Service Establishments, Residential Buildings septic tanks and pump stations, sanitary sewer systems, etc.)
6. For chemical/portable toilet waste transporters: list of chemicals used (e.g., disinfectants/deodorizers) and Safety Data Sheets (SDSs). Note that formalin or formaldehyde-based disinfectants/deodorizers and similar chemicals are prohibited and shall not be used.
7. Disposal Facilities used or to be used for unloading liquid waste.
8. Authorization Form with Declaratory statement by owner.

LW-ST^{2.0} Miami-Dade County Liquid Waste Transportation & Disposal Guidance Manual

The Pollution Regulation Division will review the application and issue a Liquid Waste Transporters Annual Operating Permit and DERM LW-ST Decals (one per vehicle) when the application is determined to be complete and applicable fee paid. The DERM LW-ST Decals shall be affixed to each transport vehicle.

A Liquid Waste Transporters Annual Operating Permit ***ONLY*** authorizes the transport of liquid waste. Authorization for the disposal of waste is granted by the disposal facility and DERM. That is, the transporter must have a DERM issued Liquid Waste Transporters Annual Operating Permit; display the DERM LW-ST Decal on each transport vehicle; and have approval from the disposal facility. Moreover, the disposal facility shall not accept transported waste from vehicles not displaying the DERM LW-ST Decal. Note MD-WASD also requires that each transport vehicle display a MD-WASD Vehicle Decal prior to disposal.

After obtaining a DERM issued Liquid Waste Transporters Annual Operating Permit and DERM LW-ST Decals for each transport vehicle, the transporter shall register (obtain approval) from the disposal facilities. For disposal at MD-WASD's SDWWTP Septage and FOG receiving facility, the transporters shall register with MD-WASD and obtain MD-WASD Vehicle Decals. This will require volume testing each vehicle, which involves driving each (empty) vehicle to SDWWTP where each vehicle will be filled with water by MD-WASD, and the starting and ending meter readings recorded. The difference between beginning and ending water meter readings will be the rated capacity of each vehicle, the ***SVL***. Each time a vehicle disposes waste at SDWWTP, the volume recorded is the rated capacity (not the actual volume). For example, if a vehicle with an SVL of 3,500 gallons arrives at SDWWTP to unload 1,500 gallons of permitted waste, MD-WASD's record will reflect 3,500 gallons.

A copy of MD-WASD's current application is included as ***Attachment 3***.

3.2 Liquid Waste Transporter Operating Permit Renewal

Renewal of Liquid Waste Transporter Annual Operating Permits is performed annually, four (4) to six (6) weeks prior to permit expiration. The renewal process is used to confirm/update Business/Corporation/owner, equipment, and chemical/portable toilet disinfectant/deodorizer materials (where applicable) information. DERM also reviews transporter compliance with permit conditions (e.g. Liquid Waste Transporter Electronic Manifest (eManifest) use and reporting) on an ongoing basis, including unscheduled inspections of transporters at the disposal facility, cross-checking disposal receipts, and quarterly meetings with MD-WASD. Transporters not complying with operating permit conditions, including but not limited to eManifest use/reporting, may have their permit revoked or renewal denied until compliance is achieved/demonstrated.

4.0 Disposal Facilities

Disposal facilities in MDC are permitted by DERM and other regulatory agencies (e.g. FDEP). The only publicly owned and operated disposal facility in MDC for hauled liquid waste is the MD-WASD SDWWTP. A common alternative to MD-WASD's SDWWTP is the **Broward County Septage Receiving Facility** in Broward County (<http://www.broward.org/WATERSERVICES/Pages/SRF.aspx>). Other facilities in MDC, private and public, may be permitted in the future. Moreover, MD-WASD's SDWWTP shall only accept hauled liquid waste as defined in **Section 2.0** and more specifically defined in **Section 5.0** of this manual.

5.0 Liquid Waste Authorized for Disposal at SDWWTP

Authorized wastes are **Non-Hazardous** hauled liquid waste listed below (and **Section 2.0** above):

1. *Domestic Sewage:*

- a. Sewage and septage from:
 - i. Package sewage treatment plants (e.g. biosolids)
 - ii. Sanitary sewer manholes, pump stations, gravity mains, and force mains⁽¹⁾
 - iii. Onsite sewage treatment and disposal systems (e.g. septic and dosing tanks) serving residential and commercial establishments
- b. Grey water systems
- c. Grease interceptor contents: Fats, Oils, and Grease (FOG)

(1) Includes wastewater from residential and commercial buildings, industrial plants and institutions. However, the MDC SUO requires pretreatment of all non-domestic wastewater to comply with local limits. Therefore, POTWs (including collection/transmission) are classified Domestic.

2. *Non-Domestic:*

- a. Chemical/portable toilets⁽²⁾
- b. Storm water (not impacted by petroleum or other waste) from catch basins, storm drains, pump stations, and retention/detention basins

(2) chemical/portable toilet waste shall not include formalin or formaldehyde-based disinfectants/deodorizers or similar chemicals.

For chemical/portable toilets, transporters shall certify that the waste does not include formalin or formaldehyde-based disinfectants/deodorizers or similar chemicals and that only chemicals approved by DERM, as part of the permit issuance and renewal process, are utilized. Furthermore, transporters of chemical/portable toilets waste shall notify DERM any time chemicals other than those approved in the application or renewal process are proposed to be used.

6.0 Other Hauled liquid waste requiring DERM/MD-WASD Approval

Hauled liquid waste not listed under **Section 5.0** shall not be disposed of at MD-WASD's SDWWTP without prior DERM and MD-WASD approval. Request for disposal of **other hauled liquid waste** will be evaluated under two (2) broad categories:

- A. Waste generated in MDC by facilities permitted by DERM (i.e. facilities with active DERM operating permit(s)).
- B. Waste generated in MDC by facilities not permitted by DERM.

Category A: waste originates in permitted facilities where DERM performs routine and follow up field inspections and has operational knowledge of waste generating processes and equipment. Therefore, the extent of waste characterization required can be determined based on this knowledge and supplemented with additional information and inspections, as required.

Category B: waste originates in non-permitted facilities or sites. Therefore, waste characterization requires greater scrutiny and evaluation. An example of a Category B waste would be groundwater from a dewatering project associated with infrastructure installation in a right-of-way area with known or suspected contamination.

For **other hauled liquid waste** to be approved for disposal at MD-WASD's SDWWTP, the waste must be shown to:

- 1. Comply with applicable narrative and numeric standards and limits in Section 24-42.4 of the Code
- 2. Not interfere with the disposal facility operations and permit limits

The review process for **other hauled liquid waste** is described below and presented in a flow chart included in **Attachment 4**.

Request for approval of **other hauled liquid waste** shall be submitted to DERM and include a completed **Other Hauled Liquid Waste Disposal Request Form**, SDSs, lab reports, as applicable, and review fee. Submittals shall be made to:

DERM Liquid Waster Transporter Program
Department of Regulatory and Economic Resources
Environmental Resources Management (DERM)
Pollution Regulation Division, 7th Floor
701 NW 1st Court
Miami, Florida 33136

DERM will review submittal and route same to MD-WASD for review and comments (i.e., applicant need not submit directly to WASD). Applicants are advised to meet with DERM prior to submitting request. Call (305) 372-6486 or (305)-372-6789 to schedule a meeting.

A copy of the ***Other Hauled Liquid Waste Disposal Request Form*** is included in **Attachment 5**. Said form shall be signed by the property owner (or person listed in Sunbiz.org as President or equal) or authorized representative (attach Letter of Authorization signed by the property owner). DERM and MD-WASD will review the request and either reject, request additional information (RAI), or approve it. Approval will only be granted if both DERM and MD-WASD determine that the waste complies with their respective standards and limits, discussed in **Section 6.1** and **6.2**, respectively. If approved, the acceptance of the ***other hauled liquid waste*** will be in the form of a DERM/MD-WASD letter which will include general and specific conditions (e.g. rate of discharge). This letter shall be attached to the eManifest form and presented to the MD-WASD SDWWTP attendant. MD-WASD staff will NOT accept any load containing ***other hauled liquid waste*** without prior DERM and MD-WASD approval (i.e. DERM/MD-WASD Approval Letter). During the unloading of the waste, the MD-WASD spotter will monitor the waste stream and cause the cessation of the unloading process if there are any indicators that the waste may be detrimental to facility personnel or operations. Furthermore, ***the spotter shall collect representative samples of the waste unloaded.***

6.1 DERM Standards and Limits for Approval

DERM utilizes narrative and numeric standards and limits in **Section 24-42.4** of the Code to characterize and evaluate ***other hauled liquid waste*** for disposal at MD-WASD's SDWWTP. If the waste is shown to comply with all applicable narrative and numeric standards and limits in **Section 24-42.4** of the Code, excluding Oil and Grease (Hexane Extractable Materials), BOD₅ and total suspended solids for ***allowed hauled waste*** (Section 5.0), DERM can issue an approval if MD-WASD standards and limits are complied with (as determined by MD-WASD). Note that Oil and Grease (Hexane Extractable Materials), BOD₅ and total suspended solids are required for ***other hauled liquid waste*** (Section 6.0).

6.2 WASD Standards and Limits for Approval

MD-WASD will review waste profile information, SDSs and laboratory results to determine if the waste is compatible with facility operations. Specifically, MD-WASD will review waste profile information to assure that discharge will not:

1. Cause toxic fumes/gases, explosive conditions, flammable conditions, corrosive conditions, or other hazard to health and safety of employees.
2. Damage equipment or impair equipment functions.
3. Disrupt plant unit operations or biological treatment processes which may cause pass through, interference or discharge limit violations.
4. Impair sludge treatment, contaminate sludge or limit the use or disposal of sludge.

LW-ST^{2.0} Miami-Dade County Liquid Waste Transportation & Disposal Guidance Manual

MD-WASD will not approve the disposal of waste if one or more of the above conditions may result from the disposal of the waste. Moreover, MD-WASD will cause the disposal of such waste to cease if one or more of the above conditions are present at the time of disposal.

7.0 Reporting Requirements

All liquid waste transporters are required to submit hauled waste manifest data to DERM online, utilizing the eManifest system, monthly on or before the 20th day of each month (e.g. by February 20th for the reporting period January 1 – January 31). Detailed instructions for the use of the eManifest system are included in **Attachment 6** and link below.

https://www8.miamidade.gov/Apps/RER/LiquidWasteTransporterElectronicManifest/General/Septage_Manifest_03-2017.pdf

Liquid waste transporters shall utilize the (paper) eManifest form to collect data from each facility serviced and contained in a **SVL**. The eManifest form is presented to the disposal facility/site attendant for review and approval. If the eManifest form is completed properly and waste can be disposed at the facility, the attendant will complete the eManifest form, which includes completing the *“Disposal Facility Certification”* section of the eManifest form and providing a duplicate copy to the transporter. On a monthly (or more frequent) basis, the transporter logs into the eManifest online system and completes the data entry process using the completed eManifest form signed by the disposal facility. Prior to transmitting (recording) the information online, the LW-ST Operating Permit holder (permittee, or authorized manager) must certify/attest that the information uploaded is true and correct and that all discharges comply with applicable local limits. The eManifest system is being updated to include the latter and should be operational for the next operating permits renewal cycle, April 1, 2018. This requirement will be included as a permit condition in the April 2018/2019 permits (effective April 2, 2018).

Disposal facilities are also required to submit disposal records to DERM. The records are linked to disposal tickets and are currently being provided by MD-WASD and the **Broward County Septage Receiving Facility**.

8.0 Disposal Facility Monitoring Requirements

Each disposal facility is required to monitor the handling and unloading of hauled waste. For facilities other than MD-WASD, the requirements shall be provided as specific permit conditions. For MD-WASD's SDWWTP, monitoring requirements are provided below.

8.1 Disposal Facility Spotter

The SDWWTP shall provide no less than one (1) spotter capable of monitoring the unloading of waste from all **SVLs**. The spotter's primary function is to **Refuse, Accept, or Accept and Watch** the unloading of waste. The spotter shall be equipped and trained to use a pH meter and explosivity meter. Additional equipment will be deployed (e.g., Photoionization Detector, PID) based on waste sampling program results (e.g., random, flagged and facility sampling).

Disposal facility staff training will include, at a minimum, the following:

1. New employee Standard Operating Procedures (SOPs), Best Management Practices (BMP) and Safety training. This training will include safety, equipment use and calibration (in class and field), sampling, and spotter training. The in-class training will also cover the County's Sewer Use Ordinance requirements and this guidance manual.
2. Monthly "in-service" meetings to report new concerns/circumstances, discuss current challenges and potential solutions, and communicate/remind employees of SOPs and safety requirements. As required, in-field equipment training will be covered when new instruments are to be used.
3. Annual refresher training to include Standard Operating Procedures (SOPs), Best Management (BMP) practices and Safety training.

Loads that are NOT permitted under the LW-ST Program shall be immediately **Refused**. For example, an **SVL** containing any of the following waste shall be immediately **Refused**:

- HW - Hazardous waste
- WO - Waste oil/oily waste water
- RF - Waste radiator fluid
- SR - Waste photo chemicals containing silver
- BW - Bio medical waste
- DA - Sludge from POTW not classified PFRP

Waste categorized as **other hauled liquid waste** that does not include a DERM/MD-WASD Approval Letter attached to the eManifest form shall be immediately **Refused**.

All eManifest and attachments shall be carefully scrutinized. If incomplete or incorrect, the **SVL** shall be **Refused** until all corrections are made and verified. ALL **Refusals** shall be reported by

WASD to DERM by calling the Liquid Waste Program and emailing a copy of the paper eManifest form.

Any **SVL** that is permitted under the LW-ST Permit category shall be **Accepted** if the eManifest and attachments are in order. However, loads **Accepted** that have odor, color, consistency or other characteristic that do not match typical or expected observations shall be **Accepted and Watched**. The spotter may order the transporter to immediately cease unloading waste if waste characters pose a threat to personnel or plant as identified above in **Section 6.2**.

The spotter shall also be capable of collecting samples from randomly selected **SVLs** and any flagged **SVL**.

8.2 Waste Sampling Programs

Three (3) distinct sampling programs are required: **Random SVL**, **Flagged SVL** and **Facility Discharge Sampling**. These are discussed below.

8.2.1 Random SVL Sampling

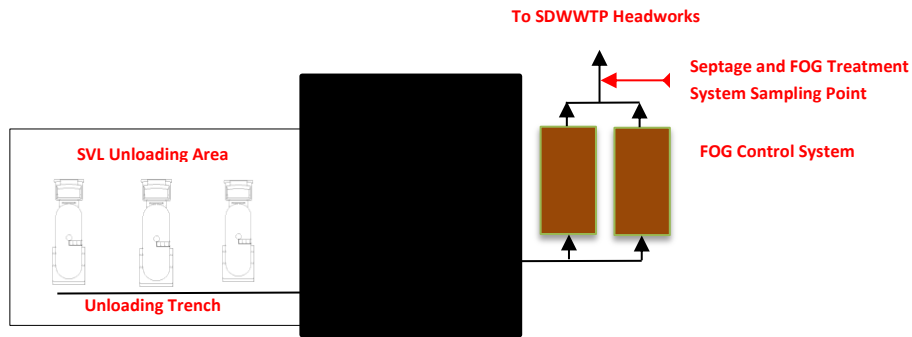
Random **SVL** sampling involves selecting no less than five (5) percent of **SVLs** daily, Monday through Sunday, excluding flagged **SVLs**. All samples collected will be analyzed for all parameters listed in **Section 24-42.4** of the Code.

8.2.2 Flagged SVL Sampling

Flagged **SVL** sampling includes collecting representative samples from all **SVLs** unloading **other hauled liquid waste** and **SVLs** identified by the spotter as **Approved and Watched** based on odor, color, consistency, or other observed characteristic(s) that suggest the waste may not be consistent with the eManifest, or pose a hazard to personnel, plant, or plant operations. Furthermore, the spotter may order the transporter to immediately cease unloading waste if waste characteristics pose a threat to personnel or plant as identified above in **Section 6.2**. Flagged **SVL** samples are not included in the five (5) percent of **SVLs** randomly sampled each day.

8.2.3 Septage and FOG Treatment System Sampling

Over time, **SVL** sampling may be adjusted to decrease the list of parameters being analyzed. The basis for this shall be evaluation of monthly data collected post the FOG and septage facility treatment system. This sampling point is located before the SDWWTP headworks as shown schematically below.



Monthly grab samples shall be collected and analyzed for all the parameters listed in **Section 24-42.4** of the Code. These sample results are not to be used to confirm compliance of the treatment facility or SDWWTP, they shall only be utilized to evaluate *trends in hauled waste characteristics* and fine tune the random and flagged **SVL** sampling procedures and determine if additional training and equipment are required. Monthly sample results shall be submitted to DERM by the 15th of the month following sample collection.

9.0 Hauled Waste Coordination & Meetings

9.1 Liquid Waste Transporters

DERM has been meeting with transporters during the development of the FOG Control Program and Ordinance and development of the eManifest System, including training, since 2014. DERM will continue to meet with transporters no less than semi-annually to provide training and foster coordination with stakeholders and the exchange of ideas to improve FOG Control and hauled waste compliance. Meetings will include the FOG Round Table which convenes quarterly.

9.2 MD-WASD & DERM

DERM meets with MD-WASD SDWWTP personnel on a quarterly basis to review random and flagged **SVL** sampling procedures and results, Septage and FOG Treatment System sampling procedures and results, and POTW incidents. The latter includes reviewing all incidents reported to DERM using the POTW Incident Notification Form. A copy of the POTW Incident Notification Form is included in **Attachment 7**.

All POTW/Disposal Facility (Septage and Hauled Waste facility) incidents are reported by the Chief Plant Operator to the MD-WASD's Emergency Communication Center. Chief Plant Operators for MD-WASD WWTPs are as follows:

- NDWWTP - Gerald Caracappa: Gerald.Caracappa@miamidade.gov, (305) 877-1976
- CDWWTP - Francois Saint-Phard: Francois.Saint-Phard@miamidade.gov, (786) 351-2576
- SDWWTP - Leo Pou: Leo.Pou@miamidade.gov, (305) 495-9601

The Communication Center is responsible for reporting any incidents to DERM. Marcelo Garcia is the manager for MD-WASD's Emergency Communication Center and can be contacted by either email (Marcelo.Garcia@miamidade.gov) or phone (786-251-5894). The Communication Center shall notify DERM of any:

- Emergency POTW incidents within 4-hours by incorporating incidents into the Spills Application.
- Non-emergency POTW incidents within 48-hours by incorporating incidents into the SSO Report.

The Spills Application and SSO Reports shall be submitted via email to:

DERM Director: Lee Hefty, Lee.Hefty@miamidade.gov

DERM Pollution Regulation Division Chief, Rashid Istambouli, Rashid.Istambouli@miamidade.gov

DERM Water & Wastewater Section Chief: Carlos L. Hernandez, hernac@miamidade.gov

Additionally, all Disposal Facility (Septage and Hauled Waste facility) incidents shall be reported by the Chief Plant Operator to DERM using the Incident Notification Form within 48 hours of a non-emergency incident and 4 hours of an emergency incident.