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Water and Sewer
PO Box 330316 • 3071 SW 38 Avenue
Miami, Florida 33146-0316
T 305-665-7471

VIA ELECTRONIC CORRESPONDENCE

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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

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

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

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

RE: Consent Decree (Case: No. 1:12-cv-24400-FAM)
Reference DOJ Case No. 90-5-1-1-4022/1
Section VI – Wastewater Treatment Plant Operations and Maintenance Program,
Paragraph 19(h)

Dear Sir/Madam:

Miami-Dade County (County) is in receipt of your request for additional information related to the November 21, 2016 submittal of the revised Wastewater Treatment Plant Operations and Maintenance Program (WWTP OMP), as required by Paragraph 19(h) of the above referenced Consent Decree (CD). Following, please find the restatement of the EPA/FDEP comments and the County's responses, clarification, and/or additional information to your questions and/or comments.

- (1) Paragraph 19.(h).(i). of the CD requires that the WWTP OMP prioritize each piece of equipment at the 3 WWTPs as critical, semi-critical or non-critical. While Miami-Dade has further broken down the prioritization into 5 categories (as opposed to 3 outlined in the CD), Appendix E does not cover all the equipment listed in the CD. Some questions remain about the lists in Appendix E.
 - a) In several places, it appears that the same item is listed multiple times and may be given different ratings. For example, on Page 626, Appendix E lists "O2 Plant 1-Plant 1" seven times, without further distinction between those items. On page 630, it lists some items

twice with different ratings. For example, "Final Settling Tnk 3-Final Settling 3" is rated as "moderate disruption," followed immediately by the same item name with a rating of "minor disruption."

- b) Concrete and metal structures, such as tanks or effluent trough/chlorine contact chambers are either not itemized or are named or organized in such a way that they were not found. Deteriorating concrete structures are an issue in a number of locations at the WWTPs and are specifically required to be listed here by multiple sub-paragraphs of CD Para. 19(h)(i). Stairways and other access structures should also be listed, since the impacts of loss of use (such as being unsafe for operators to walk on/through) is included as a concern in this Paragraph.

RESPONSE: The Department understands the intent of this requirement is to quantify the risk of equipment and process failures within the treatment plants by assigning priorities. The asset/equipment priority ratings (typically referred to as criticality ratings) was performed by subject matter experts within the Treatment Plant Division as part of InforEAM™ implementation in 2013-2014. The Department acknowledges the duplication of equipment with conflicting ratings and missing concrete structures as described in the comment. Recognizing this is a continuous process, CMOM implementation activities include an asset register management plan to improve data accuracy (as recommended in the WWTP OMP) and asset condition assessments (as part of the SSAMP), which will provide the Department with a complete asset inventory as well as improved condition and risk/prioritization rankings. In addition, the Department is developing an enterprise-wide asset management framework, including conducting a gap analysis and producing a roadmap to develop complete and consistent asset management programs across the utility. The intent of the phased implementation of the CMOM program is to develop programs and processes that continuously update, correct, and improve collection of asset information. With the development of asset management programs, root causes of inaccurate data will be addressed in an effective manner at that time.

- (2) Table 04-1, Key Performance Indicators. Please define "reportable" SSOs.

RESPONSE: According to Section 5.01 "SSO Reporting Requirements" of the Sewer Overflow Response Plan, submitted in August 15, 2017, reportable SSO's are unauthorized releases or spills in excess of 1,000 gallons per incident or that endanger public health or the environment. Under Florida Administrative Code (F.A.C.) Chapter 62-604.550 for any reportable SSO MDWASD must, within 24 hours, provide an oral report to FDEP through the Florida State Watch Office and the State Warning Point Hotline at (800) 320-0519, with details of the SSO to the extent known.

- (3) Comment #10 (bullet #3): The goal should be 0 pass-through or upset events per year, not a "limit" of 5 events. Also, what will MDWASD do if they surpass this "limit" of 5 events/year (e.g. increased meetings between WASD and RER-DERM; increased inspections by RER-DERM, etc.)?

RESPONSE: It is understood that the ultimate goal is zero (0) events, but the limit prompting a formal regulatory response, regardless of meeting treatment plant discharge limits and performance indicators

as described in Table 04-1, is five (5) events. The intent is that a revision in WASD policy or regulatory response would not occur unless events exceed the five (5) events per year as stated. Upon a 5th event in a calendar year, WASD and RER-DERM will escalate monitoring of hauled waste shipments including increased sampling and analysis of hauled waste. In addition, new reporting procedures and quarterly meetings between RER-DERM and Wastewater Treatment Plant Staff, as outlined in Section 11- Hauled Waste Control Program, allows for proactive responses to any pass-through or upset events.

(4) Comment #11(b): Was the County's SUO amended and submitted in January 2017 (I don't have record of it being submitted to me)?

RESPONSE: RER-DERM submitted responses to FDEP's (July 17, 2017) comments on November 17, 2017. The County is currently waiting for FDEP's final approval of the Sewer Use Ordinance (SUO). The SUO shall be enacted (approved by MDC-BCC) within 180 days of FDEP's approval.

(5) Comment #12(b): Did the County re-evaluate its local limits (Chapter 24 of the Miami-Dade Code) this summer?

RESPONSE: The County is in process of seeking consultant support to re-evaluate the County's local limits. The consultant selection has not been made; the project is currently in procurement. RER-DERM is keeping FDEP informed of the status of this project on a regular basis.

(6) Comment #12(d): Did the County start conducting random samples of the hauled waste at SDWWTP in March 2017?

RESPONSE: The first random collection of hauled waste occurred on May 10th, 2017 and continues as a standard practice. The random sample collection practice and procedures used at the SDWWTP are in accordance with EPA's Handbook Guidance Manual for Control of Hauled Wastes EPA-833-B-98-003.

(7) Comment 19.(b). (Section 05, Plant Operations): FDEP did not mean to request such information. What was intended was to establish whether the SCADA system is well secured from meddling by outside entities via the Internet, since greater remote accessibility makes a system more vulnerable.

RESPONSE: The WASD SCADA network has external connections to the Miami-Dade County network (MetroNet), as well as the Internet. Firewalls exist between the SCADA network and MetroNet and the Internet to provide significant security and are configured to deny all traffic except that which is explicitly authorized. The SCADA network generates outbound communication to the Internet for Windows updates, antivirus signatures, vendor support, etc. Inbound Internet communication for remote access to SCADA is accomplished through two-factor authentication, in addition to username and password. Vendor support requiring file transfer is only permitted over the MetroNet connection. Additionally, historical SCADA data is only accessible via MetroNet.

(8) Comment 19.(c).: Are these the only plant operation SOPs already in existence? Or are written SOPs available for other tasks?

RESPONSE: Each wastewater treatment plant has a library of process and equipment related standard operating procedures. In addition, the CMOM implementation activities will include the development of maintenance work management guidelines, creation of a knowledge capture plan, continued development of standard operating and maintenance procedures, to develop comprehensive facility level O&M Manuals.

(9) Comment 24.(b).: There was no description of how funding would be obtained.

RESPONSE: MDWASD is committed to implementing the WWTP OMP and allocating the necessary funding. Upon implementation of the WWTP OMP, results will be analyzed and considered to further refine the program and identify appropriate funding levels going forward. Funding requirements will be addressed through MDWASD's annual budgeting process, and required resources will be appropriated.

The above responses serve to clarify the intent of the revised WWTP OMP submitted to EPA/FDEP on November 21, 2017, and to fully comply with the requirements set forth in paragraph 19(h) of the CD. Should you have any further 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.

Deputy Director, Capital Improvement Programs & Regulatory Compliance

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

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
Sed.wastewater@dep.state.fl.us

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

Lester Sola, Director
Miami-Dade Water and Sewer Department
3071 SW 38th 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

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

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

ebc: Hardeep Anand
Antonio Cotarelo
Douglas L. Yoder
Marisela Aranguiz
Josenrique Cueto
Lynnette Ramirez
Frances G. Morris
Sarah Davis
Ureaka Wyche
Sherry Negahban
Richard O'Rourke
Robert Fergen
Al Galambos
Dan Edwards
Rolando Roque
Juan Bedoya
Amanda Kinnick
Lee N. Hefty (RER-DERM)
Carlos Hernandez (RER-DERM)
Rashid Istambouli (RER-DERM)