



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Alexis A. Lambert
Secretary

Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

January 24, 2025

Kevin Sweet, City Manager
City of Winter Springs
1126 E. State Road 434
Winter Springs, FL 32708
ksweet@winterspingsfl.org

Re: Warning Letter
Winter Springs East
DW Facility ID No. FLA011068
Seminole County

Dear Mr. Sweet:

A File Review and Compliance Evaluation Inspection were conducted on your facility on January 15, 2025 and September 20, 2024 under the authority of Chapter 403.091, Florida Statutes (F.S.). During this inspection, possible violations of Chapter 403, F.S. and Chapter 62-600, Florida Administrative Code (F.A.C.) were observed.

During the January 15, 2025 file review Department personnel noted the following:

- Total suspended solids maximum effluent exceedances were reported on the DMRs for September and October 2024.

During the September 20, 2024 inspection Department personnel noted the following:

- Failure to annually calibrate the flow meter for the required monitoring site Rapid Infiltration Basins (FLW-5).
- Total suspended solids maximum effluent exceedances were reported on the DMRs for October - December 2023, and February, March, May, June, and August 2024.
- Fecal coliform monthly maximum effluent exceedances were reported on the DMRs for November 2023, and March – May 2024.
- Fecal Coliform % less than detection exceedances were report on the DMRs for October – December 2023, and March 2024.
- Nitrate maximum effluent exceedances were noted on the DMRs for October and December 2023 and January and February 2024.

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

Winter Springs East; Facility ID No.: FLA011068
Warning Letter
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January 24, 2025

Please contact Trey Stamm via email at Trey.Stamm@FloridaDEP.gov, within **7 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), Florida Statutes. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,



Aaron Watkins, Director
Central District
Florida Department of Environmental Protection

AW/dkh/ts

Enclosures: Inspection Report

cc: Kevin McCann, kmccann@winterspringsfl.org
Meera McKie, MMcKie@carollo.com
Edward de la Parte, Jr., edelaparte@dgfirm.com
FDEP: Daniel K. Hall, Trey Stamm

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTEWATER COMPLIANCE INSPECTION REPORT

Facility Name and Physical Address Winter Springs/ East WRF 1560 Winter Springs Blvd. Winter Springs, FL 32708	WAFR ID FLA011068	County Seminole	Entry Date 9/20/2024	Entry Time 9:06 AM
	Facility Phone # (407) 327-5989		Exit Date 9/20/2024	Exit Time 11:24 AM

LAT	28	°	40	′	32.48	″
LONG	81	°	14	′	32.16	″

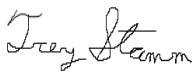

Name(s) of Field Representatives(s) and Title	Operator Certification #	Email	Phone
Todd Petrie Meera McKie Scott Richards John Wallace Matthew Edwards	0026178 0029252	todd.petrie@veolia.com MMcKie@carollo.com srichards@carollo.com	(407) 455-3798

Name & Address of Permittee / Designated Rep.	Title	Email	Phone
Bilal Iftikhar	Director of Utilities	biftikhar@winterspringsfl.org	(407) 327-5989

Inspection Type	C	E	I		Samples Taken(Y/N): N	Sample ID#: N/A	Samples Split (Y/N) : N
<input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Industrial							

FACILITY COMPLIANCE AREAS EVALUATED							
IC = In Compliance; MC = Minor Out of Compliance; NC = Out of Compliance; SC = Significant out of Compliance; NA = Not Applicable; NE = 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	SC	9. ♦ Effluent Quality
IC	2. ♦ Compliance Schedules	IC	4. Sampling	NC	7. Flow Measurement	IC	10. ♦ Effluent Disposal
		IC	5. ♦ Records & Reports	IC	8. ♦ Operation & Maintenance	IC	11. Biosolids
						IC	12. ♦ Groundwater
NA	14. Other					IC	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
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Recommended Actions: Warning Letter		
Name(s) and Signature(s) of Inspector(s) Trey Stamm 	District Office/Phone Number CD/ (407) 897-4168	Date 12/18/2024
Name and Signature of Reviewer Daniel K. Hall 	District Office/Phone Number CD/ (407) 897-4167	Date 1/9/2025

Single Event Violations (*SNC SEVs)

Check for Yes	Evaluation Area	Description	Finding Description	Finding ID
<input type="checkbox"/>	Permit	Effluent Violations - Unapproved Bypass	Wastewater was diverted from a portion of the treatment process without department approval.	UNBY
<input type="checkbox"/>	*Permit	Permit Violations - Discharge Without a Valid Permit	The facility was operating without a permit or with an expired permit.	UPHI
<input type="checkbox"/>	Permit	Permit Violations - Failure to Submit Timely Permit Renewal Application	The permittee failed to submit an application to renew the existing permit at least 180 days prior to expiration.	PFSA
<input type="checkbox"/>	Laboratory	Management Practice Violations - Laboratory Not Certified	The laboratory was not certified by the Florida Department of Health and therefore is not certified to meet NELAC standards.	LNCE
<input type="checkbox"/>	Sampling	Monitoring Violations - Analysis not Conducted	The facility failed to collect and/or analyze samples as required by permit or enforcement action.	ANCV
<input type="checkbox"/>	Sampling	Monitoring Violations - Failure to Monitor for Toxicity Requirements	The facility failed to collect and/or analyze routine or follow-up toxicity samples.	FTOX
<input type="checkbox"/>	Records and Reports	Management Practice Violations - Failure to Develop Adequate SPCC Plan	The facility failed to develop or maintain their Spill Prevention Control and Countermeasures (SPCC) plan.	FSPC
<input type="checkbox"/>	Records and Reports	Management Practice Violations - Failure to Maintain Records	The facility failed to maintain records for the required retention period.	FMRR
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to Notify	The permittee failed to notify the department of any event or activity that requires notification as required by permit or rule.	RSWP
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to Submit DMRs	The permittee failed to submit any DMR required by rule, permit, or enforcement action in a timely manner.	FDMR
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to submit required report (non-DMR, non-pretreatment)	The facility failed to submit any report required by rule, permit, enforcement action or inspection activity except for DMRs.	FRPT
<input type="checkbox"/>	Facility Site Review	Management Practice Violations - Improper Land Application (non-503, non-CAFO)	The land application system was not being maintained.	LASN
<input type="checkbox"/>	Flow Measurement	Monitoring Violations - No Flow Measurement Device	The facility failed to install a flow measurement device, an approved flow measurement device, or a working flow measurement device.	NOFL
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - Improper Operation and Maintenance	The facility failed to follow their operation and maintenance plan/manual or their Biosolids Nutrient Management Plan.	IONM
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - Inflow/Infiltration (I/I)	The facility had an inflow and infiltration problem causing collection system issues and/or operational issues.	ININ
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - No Licensed/Certified Operator	The facility was being operated without a certified operator or by an operator that is not licensed for the size of plant.	ONCO
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent acute toxicity has been documented through follow-up tests.	EATX
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent chronic toxicity has been documented through follow-up tests.	ECTX
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent acute or chronic toxicity has been documented in the effluent through the use of routine and follow-up tests.	ETOX
<input checked="" type="checkbox"/>	Effluent Quality	Effluent Violations - Narrative Effluent Violation	The facility violated a permit or enforcement narrative effluent limit.	XNEV
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Reported Fish Kill	The facility had a discharge of wastewater that resulted in a fish kill.	XFSH
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Discharge to Waters	A sewage spill from any components of a collection/transmission system or from a treatment plant reached surface waters including stormwater conveyance system or drainage ditch.	SSO1
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to Maintain Records or Meet Record Keeping Requirements	The facility failed to keep routine documentation and reporting records of spills, and/or operation and maintenance activities on the collection/transmission system.	SSO2
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to monitor	The facility failed to collect and/or analyze bacteriological samples for sewage spills that reached surface waters.	SSO3
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to report violation that may endanger public health 122.41(1)(7)	The facility failed to report a sewage spill within 24 hours of discovery.	SSO4
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Improper Operation and Maintenance	The facility failed to perform routine preventative maintenance to keep the collection/transmission system in good working order.	SSO5
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Overflow to Dry Land	A sewage spill from any part of a collection/transmission system or treatment plant that did not make it to surface waters, i.e., stormwater collection system, drainage ditch, stream, pond, or lake.	SSO6

Facility Treatment Summary: The facility is an existing 2.012 MGD annual average daily flow (AADF) permitted capacity contact stabilization domestic wastewater treatment plant consisting of flow equalization, influent screening, contact and re-aeration, secondary clarification, filtration, chlorination, aerobic digestion and dewatering of biosolids using a portable belt filter press. The facility also has an existing 2.012 MGD annual average daily flow permitted capacity slow-rate public access system (R-001) which consists of consisting of a 3.0 MG reclaimed water storage tank, a 5.61 MG lined reject/wet weather storage pond, a 40 acre restricted access sprayfield (Oak Forest Spray Field, 0.201 MGD AADF), and public access irrigation within the permitted reuse service area with a capacity of 1.720 MGD. The sprayfield requires high level disinfection due to setbacks and an existing 0.610 MGD annual average daily flow permitted capacity rapid infiltration basin system. R-002 is a reuse system which consists of the 6.8-acre Owasco RIBs having a capacity of 0.610 MGD.

1. ♦Permit: In-Compliance

Current Permit available on-site?	Yes
Date Permit issued	July 7, 2022
Date Permit Expires	July 6, 2027
Permit Renewal Application due by	January 6, 2027
Administrative or Judicial Orders?	N/A

1.1 **Observation:** A copy of the current permit was onsite and available for review.

2. ♦Compliance Schedules: In-Compliance

Compliance Schedule in Permit met?	Yes
Compliance Schedules in Order are being met?	Not Applicable

3. Laboratory: In-Compliance

Contract Lab Name	Pace Analytical
Facility NELAC Certification #	E83079

3.1 **Observation:** A copy of the lab certification was available and up to date at the time of inspection.

4. Sampling: In-Compliance

Sampling conducted during inspection?	No
Sampling observed during inspection?	No
Sampling conducted at locations identified by the permit?	Yes
Safe access to sampling locations?	Yes

4.1 **Observation:** Influent – The Sigma AS950 composite sampler was programmed to collect 16-hour flow proportioned composite samples weekly. Sampling was not being conducted at the time of inspection. The sampler temperature was 6°C at the time of inspection and the aliquot collected was 640 mL. The tubing appeared to be in good condition and is replaced monthly. The composite sampler appeared to be functioning properly at the time of inspection.

- 4.2 **Observation:** Effluent – The Hach AS950 composite sampler was programmed to collect 16-hour flow proportioned composite samples. Sampling was not being conducted at the time of inspection. The temperature of the thermometer was 5.0°C. the sample tubing appeared to be in good condition and is replaced monthly. The sample aliquot volume was set 300 mL and collected approximately 270 mL at the time of inspection. The composite sampler appeared to be functioning properly at the time of inspection.
- 4.3 **Observation:** TSS Meter – A Hach sc200 was in use at the time of inspection for TSS monitoring. The inline readings are compared to the grab sample data on a daily basis.
- 4.4 **Observation:** TRC Meter – An ATI Q46 inline meter was in use at the time of inspection and has a high setpoint of 20 mg/L. The chlorine reading at the time of inspection was 10.0 mg/L. The Hach bench meter is compared to the inline meter daily and the bench meter is verified daily with secondary gel standards which were not expired at the time of inspection.
- 4.5 **Observation:** pH meter – An Emerson 1056 inline meter was in use at the time of inspection. A Hach HQ440D bench meter is used to verify the inline meter and is calibrated using 4.0, 7.0, and 10.0 buffer solutions, which were all within their expiration dates.
- 4.6 **Observation:** Thermometers – All thermometers in use were in good condition with NIST certifications maintained onsite.

5. **Records and Reports:** In-Compliance

Documents/Records reviewed	Time frame
Discharge Monitoring Reports (DMRs)	From September 2023 to August 2024

- 5.1 **Observation:** The DMRs in the review period were submitted to the Department in a timely manner.
- 5.2 **Observation:** A bound and numbered Operations and Maintenance Logbook with sampling and maintenance logged was onsite and available for review.
- 5.3 **Observation:** All operator licenses were current, onsite, and available for review.
- 5.4 **Observation:** An Operations and Maintenance Manual was onsite and available for review.
- 5.5 **Observation:** An Annual Reuse Report was submitted to the Department on December 14, 2023.
- 5.6 **Observation:** Pathogen monitoring results were submitted on-time to the Department on November 21, 2024
- 5.7 **Observation:** An Operating Protocol (OP) was onsite and available or review.
- 5.8 **Observation:** Certification records for the reduced pressure zone (RPZ) device were onsite and available for review.
Additional Comments: The RPZ was last certified on September 18, 2024.

6. Facility Site Review: In-Compliance

- 6.1 **Observation:** The facility is surrounded by a fence with emergency contact information and advisory signage.
- 6.2 **Observation:** The facility has an emergency generator which is tested weekly.
- 6.3 **Observation:** The facility has one reduced pressure zone device which appeared to be functioning properly at the time of inspection with no noted leaks.
- 6.4 **Observation:** The facility has two treatment plants, one designed for 1.4 MGD and one for 0.7 MGD.
- 6.5 **Observation:** Plant 1 has three aeration basins and Plant 2 has two aeration basins.
Additional Comments: The aeration basins appeared well mixed and light brown in color.
- 6.6 **Observation:** The facility has three housed blowers which appeared to be functioning properly at the time of inspection.
- 6.7 **Observation:** The headworks of the facility has two automatic barscreens. The grit and screenings are disposed of properly in a closed-lid container.
- 6.8 **Observation:** A lift station malfunction caused a heavy amount of sand to be pumped into the headworks of the facility. This malfunction was being addressed prior to the inspection.
- 6.9 **Observation:** The facility has one clarifier per plant with skimmer arms in both of them which appeared to be functioning properly at the time of inspection.
- 6.10 **Observation:** The facility has a sand filtration system which appeared to be functioning properly at the time of inspection. It is continuously backwashed automatically.
- 6.11 **Observation:** The facility has two chlorine contact chambers which alternate. Four chlorine pumps are used and appeared to be functioning properly at the time of inspection. The effluent appeared to be clear at the time of inspection.
- 6.12 **Observation:** The facility has three digester basins with room for wasting.
Additional Comments: No odors or vectors were noted at the time of inspection. The sludge is polymerized and belt pressed prior to disposal.

7. Flow Measurement: Out-of-Compliance

Flow meter present and location as per permit?	Yes
Easy access to flow meter?	Yes
Date of last flow meter calibration	March 1, 2024

- 7.1 **Deficiency: Failure to annually calibrate the flow meter for the required monitoring site Rapid Infiltration Basins (FLW-5). The onsite calibration record shows the last calibration date for this monitoring site was June 2, 2022. This is a repeat violation from the last inspection on March 23, 2021.**
Rule/Permit Reference: Chapter 62-600.200(25)(a) F.A.C. – For wastewater facilities having a permitted capacity of 100,000 gallons per day or greater, flow values obtained from recording flow meters and totalizers, calibrated at least once every 12 months.

Corrective Action: Calibrate FLW-5 and submit an electronic copy of the calibration record to the Department.

7.2 **Observation:** The flow meter calibration records for FLW-1, FLW-2, FLW-3, FLW-4, and FLW-6 were onsite, up to date, and available for review.

8. **Operation and Maintenance:** In-Compliance

Facility being operated as per permit?	Yes
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8.1 **Observation:** Operator onsite times are in line with the permit requirements.

9. **Effluent Quality:** Significant-Out-Of-Compliance

DMRs review period	From September 2023 to August 2024
Any exceedances?	Yes

9.1 **Deficiency:** In the following months, the Total Suspended Solids monthly maximum (TSS max) exceeded the permitted limit of 5 mg/L:

- In October 2023, TSS max was reported as 45.2 mg/L,
- In November 2023, TSS max was reported as 37.4 mg/L,
- In December 2023, TSS max was reported as 31.9 mg/L,
- In February 2024, TSS max was reported as 11.5 mg/L,
- In March 2024, TSS max was reported as 95 mg/L,
- In May 2024, TSS max was reported as 8.1 mg/L,
- In June 2024, TSS max was reported as 9.5 mg/L,
- In August 2024, TSS max was reported as 32 mg/L

Rule/Permit Reference: Chapter 62-600.660 (3)(c), F.A.C. - Grab samples shall be used to test for TSS where a facility is required to meet the 5.0 mg/L TSS limitation associated with high-level disinfection for a reuse system permitted under Chapter 62-610, F.A.C.

Corrective Action: Provide a written explanation to the Department in response to the Warning Letter detailing why TSS has been consistently above the permitted limit and what actions are being taken to try to eliminate further TSS exceedances.

9.2 **Deficiency:** In the following months, the Fecal Coliform monthly maximum (Fecal Coliform max) exceeded the permitted limit of 25 fcc/100mL:

- In November 2023, Fecal Coliform max was reported as 123 fcc/100mL,
- In March 2024, Fecal Coliform max was reported as 20000 fcc/mL,
- In April 2024, Fecal Coliform max was reported as 60 fcc/mL,
- In May 2024, Fecal Coliform max was reported as 60 fcc/mL,

Rule/Permit Reference: Chapter 62-600.440 (6), F.A.C. - 2. Any one sample shall not exceed 25 fecal coliform values per 100 mL of sample.

Corrective Action: Provide a written explanation to the Department detailing what caused these significant fecal coliform exceedances, how they were addressed, and what is being done to address this issue going forward.

9.3 **Deficiency:** In the following months, the Fecal Coliform % less detection exceeded the permitted limit of 75% minimum:

- In October 2023, Fecal Coliform % less detection was reported as 60.0% minimum,

- **In November 2023, Fecal Coliform % less detection was reported as 70.0% minimum,**
- **In December 2023, Fecal Coliform % less detection was reported as 73.7% minimum,**
- **In March 2024, Fecal Coliform % less detection was reported as 56% minimum.**

Rule/Permit Reference: Chapter 62-600.440 (6)(1), F.A.C. - 1. Over a 30 day period (monthly), 75% of the fecal coliform values shall be below the detection limits.

Corrective Action: Provide a written explanation to the Department detailing what caused these significant fecal coliform exceedances, how they were addressed, and what is being done to address this issue going forward.

9.4 Deficiency: In the following months, the Nitrate Maximum (Nitrate max) exceeded the permitted limit of 12.0 mg/L:

- **In October 2023, Nitrate max was reported as 13.70 mg/L,**
- **In December 2023, Nitrate max was reported as 14.40 mg/L,**
- **In January 2024, Nitrate max was reported as 17.50 mg/L,**
- **In February 2024, Nitrate max was reported as 12.8 mg/L.**

Rule/Permit Reference: Chapter 62-610.510 (1), F.A.C. - At a minimum, preapplication waste treatment shall result in a reclaimed water meeting secondary treatment and basic disinfection levels prior to spreading into the rapid infiltration basins or absorption field system. The nitrate concentration in the applied reclaimed water shall not exceed 12 mg/L (as nitrogen) unless reasonable assurance is provided in the engineering report that nitrate as measured in any hydraulically down-gradient monitoring well located at the edge of the zone of discharge established in accordance with Chapter 62-520, F.A.C., will not exceed 10 mg/L or background levels in the receiving ground water, whichever is less stringent. Design nitrate content of the reclaimed water prior to reuse shall be established by the permittee subject to Department approval. Additional treatment may be required as a result of the pond location, subsurface drainage, and hydraulic loading rate provisions contained below.

Corrective Action: Provide a written explanation to the Department detailing what caused these nitrate exceedances, how they were addressed, and what is being done to address this issue going forward.

10. ♦Effluent Disposal: In-Compliance

Facility discharging?	Yes
Discharge location(s) as per permit?	Yes

10.1 Observation: The facility has four Rapid Infiltration Basins (RIBs) and one lined reject pond.

Additional Comments: The RIBs and the reject pond had adequate freeboard.

10.2 Observation: The RIBs and the reject pond are access controlled with proper advisory signage.

Additional Comments: Proper signage was posted at PAR disposal sites.

10.3 Observation: The facility was discharging to the RIBs as specified by the permit.

11. Biosolids: In-Compliance

11.1 Observation: Biosolid Hauling Records were onsite and available for review.
Additional Comments: 31.60 wet tons of biosolids were last hauled on September 9, 2024 by Compost USA.

12. Groundwater Quality: In-Compliance

DMRs review period	From September 2023 to August 2024
Any exceedances?	No
All monitoring wells accessible, secured & locked?	Yes

13. SSO Survey: In-Compliance

Does the facility have an Operation and Maintenance Manual for their collection system?	Yes
Does the facility track spills in their collection system?	Yes
Does the facility have procedures for minimizing spills?	Yes
Are those procedures included in the Operation and Maintenance Manual or in a separate document?	Included
How often is the manual updated?	N/A

13.1 Observation: A Sanitary Sewer Overflow Response Plan and an Operation and Maintenance Manual for the collection system were onsite and available for review.

14. Other: Not Applicable