



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

March 23, 2021

Shawn Boyle, City Manager
City of Winter Springs
1126 E. State Road 434
Winter Springs, FL 32708
sboyle@winterspringsfl.org

Re: Warning Letter
Winter Springs West WWTF
DW Facility ID FLA011067
Seminole County

Dear Mr. Boyle:

Inspections were conducted for your system on January 6, 2021, January 12, 2021, January 28, 2021 and February 11, 2021. During these inspections, possible violations of Chapter 403, F.S., Rule 62-620, Florida Administrative Code (F.A.C.), Rule 62-610, F.A.C., Rule 62-600, F.A.C., Rule 62-520, F.A.C., Rule 62-160, F.A.C., Rule 62-602, F.A.C., and current Permit Conditions in FLA011067, were observed.

During the inspections Department personnel noted the following:

- At the time of inspection on January 6, 2021, evidence of a fish kill was noted in Lake Audubon which was attributed to the unauthorized discharge on January 2, 2021.
- Treatment plant flows had bypassed the filtration and disinfection systems. These flows were discharged to the land application disposal systems.
- Bypassed flows were not monitored as required in the current permit.
- Several abnormal events at this facility were reported late or not reported to the Department as required in the current permit.
- Numerous reporting/transcription errors were noted throughout the Discharge Monitoring Report (DMR) review period.
- The current public access reuse operating protocol was not onsite and available to operations personnel at the time of inspection.
- According to Department records the Annual Reuse Report for 2019 and 2020 were not submitted as required in the current permit.
- According to Department records the pathogen monitoring report was last submitted in 2017, the sampling and reports are required every 2 years.

- On the November 2020 DMR the Fecal Coliform was not reported at the frequency required for R-001.
- Several treatment systems throughout the facility were not operating as designed at the time of inspection.
- Excessive odors were noted outside the boundaries of the facility at the time of inspection.
- Multiple effluent exceedances were noted in all land application systems throughout the DMR review period.
- Sub-standard public access reuse was discharged to the public access reuse distribution system.
- Facility failed to operate the effluent land application disposal system as designed.
- Solids were noted in the Dayron Rapid Infiltration Basins (RIBs) at the time of inspection.
- Groundwater exceedances were reported during the DMR review period.
- According to notes on the 2020 fourth quarter DMR, MWI-5 has been damaged and samples could not be collected.
- The Department has not received the revised/updated final written report for the unauthorized discharge that occurred on January 2, 2021.
- In-line and bench field meter comparison documentation errors and/or missing information was noted.
- Operations and maintenance logbook entries were inconsistent, vague, and did not provide clarity.
- Field meter calibration/verification documentation was missing required information.
- Routine composite sampler maintenance records were not provided.
- Reject procedures outlined in the current operating protocol were not followed.
- During the review of the November 2020 DMR data and the effluent land application disposal logs, the Dayron RIBs flow calculations did not match.
- Current flow meter calibration documentation was not provided for all permitted compliance flow meters.

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, Florida Statutes.

Please contact Jenny E. Farrell, at (407) 897-4173, within **two 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,

A handwritten signature in black ink, appearing to read "Aaron Watkins", with a stylized flourish at the end.

Aaron Watkins, Director
Central District
Florida Department of Environmental Protection

AW/ds/jef

cc:

Dale Smith , Winter Springs, dsmith@winterspringsfl.org
FDEP: Jenny E. Farrell, David Smicherko

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTEWATER COMPLIANCE INSPECTION REPORT

Facility Name and Physical Address Winter Springs/West 1000 West SR-434 Winter Springs, FL 32708	WAFR ID FLA011067	County Seminole	Entry Date 1/6/2021	Entry Time 11:08 AM
	Facility Phone #		Exit Date 1/6/2021	Exit Time 11:45 AM

LAT	28	°	42	'	16.69	"
LONG	81	°	19	'	12.87	"

Name(s) of Field Representatives(s) and Title	Operator Certification #	Email	Phone

Name & Address of Permittee / Designated Rep. Kipton Lockcuff City of Winter Springs 1126 East SR 434 Winter Springs, FL 32708	Title PE	Email	Phone (407) 327-5989
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Inspection Type	C	I			Samples Taken(Y/N): N	Sample ID#: N/A	Samples Split (Y/N) : N
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X Domestic ☐ **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
NE	1. ♦ Permit	NE	3. Laboratory	NE	6. Facility Site Review	NE	9. ♦ Effluent Quality
NE	2. ♦ Compliance Schedules	NE	4. Sampling	NE	7. Flow Measurement	NE	10. ♦ Effluent Disposal
		NE	5. ♦ Records & Reports	NE	8. ♦ Operation & Maintenance	NE	11. Biosolids
						NE	12. ♦ Groundwater
NA	14. Other					SC	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) Sean M. Boyles 	District Office/Phone Number CD/ (407) 897-4164	Date 2/8/2021
Name and Signature of Reviewer Daniel K. Hall 	District Office/Phone Number CD/ (407) 897-4167	Date 2/10/2021

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 type="checkbox"/>	Effluent Quality	Effluent Violations - Narrative Effluent Violation	The facility violated a permit or enforcement narrative effluent limit.	XNEV
X	*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 2.07 MGD annual average daily flow (AADF) permitted capacity dual-train contact stabilization domestic wastewater treatment plant (2.5 MGD design capacity for all units except the filters) consisting of influent screening, aeration, secondary clarification, filtration, chlorination, and aerobic digestion and dewatering of biosolids.

Land Application R-002: An existing 0.200 MGD annual average daily flow permitted capacity slow-rate restricted public access reuse system. R-002 is a reuse system which consists of spray field having a capacity of 0.2 MGD. Wet-weather storage is also provided at the treatment plant, as noted above.

Land Application R-003: An existing 0.740 MGD annual average daily flow permitted capacity rapid infiltration basin (RIB) system. R-003 is a reuse system which consists of the Dayron RIBs having a capacity of 0.530 MGD, the Mt. Greenwood RIBs having a capacity of 0.110 MGD, and Site 17 RIBs having a capacity of 0.100 MGD.

1. **♦Permit:** Not Evaluated
2. **♦Compliance Schedules:** Not Evaluated
3. **Laboratory:** Not Evaluated
4. **Sampling:** Not Evaluated
5. **♦Records and Reports:** Not Evaluated
6. **Facility Site Review:** Not Evaluated
7. **Flow Measurement:** Not Evaluated
8. **♦Operation and Maintenance:** Not Evaluated
9. **♦Effluent Quality:** Not Evaluated
10. **♦Effluent Disposal:** Not Evaluated
11. **Biosolids:** Not Evaluated
12. **♦Groundwater Quality:** Not Evaluated
13. **♦SSO Survey:** Significant-Out-Of-Compliance

- 13.1 **Deficiency:** When walking the boundary of the lake, just to the east of the WWTF, several dead fish were observed. The fish kill is attributed to an unauthorized discharge of partially treated effluent from the facility to the lake.

Rule/Permit Reference: Chapter 62-620.610(5), F.A.C., This permit does not relieve the permittee from liability and penalties for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted source; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department. The permittee shall take all reasonable steps to minimize or prevent any discharge, reuse of reclaimed water, or residuals use or

disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Corrective Action: Corrective actions will be handled through a consent order.

- 13.2 Deficiency:** At the southwest end of the lake, closest to the WWTF, an odor was noted beyond the boundaries of the facility. The odor is distinctive of odors from a wastewater treatment facility.

Rule/Permit Reference: Chapter 62-600.410(5), F.A.C., In the event that the wastewater facilities or equipment no longer function as intended, are no longer safe in terms of public health and safety, or odor, noise, aerosol drift, or lighting adversely affect neighboring developed areas at the levels prohibited by paragraph 62-600.400(2)(a), F.A.C., corrective action (which may include additional maintenance or modifications of the treatment plant) shall be taken by the permittee. Other corrective action may be required to ensure compliance with rules of the Department.

Corrective Action: Ensure the facility is operated in a manner that minimizes odors beyond the boundaries of the facility. Further corrective actions will be handled through a consent order.

- 13.3 Observation:** In the northwest of the lake, there was a pipe that was discharging into the lake.

Additional Comments: The origin of this pipe is unknown at this time.

- 13.4 Observation:** At the south end of the lake, there was a small alcove. The water in the alcove had an odor that can be attributed to stagnant water.

Additional Comments: The water on the alcove appeared to be gray and cloudy. There appeared to be a layer of scum or slime on the surface of the water.

- 14. Other:** Not Applicable



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF

Photo #: DSCN4882
Date: Jan 6, 2021
Time: 11:30 AM
Captured by: Sean M. Boyles

Details:

Photograph of dead fish in the lake to the East of the facility.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF

Photo #: DSCN4883
Date: Jan 6, 2021
Time: 11:30 AM
Captured by: Sean M. Boyles

Details:

Photograph of dead fish in the lake to the East of the facility.



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: DSCN4887
Date: Jan 6, 2021
Time: 11:30 AM
Captured by: Sean M. Boyles

Details:

Photograph of dead fish in the lake to the East of the facility.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: DSCN4885
Date: Jan 6, 2021
Time: 11:30 AM
Captured by: Sean M. Boyles

Details:

Photograph of the scum layer on top of the water in the alcove at the South end of the lake, that is to the East of the facility.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTEWATER COMPLIANCE INSPECTION REPORT

Facility Name and Physical Address Winter Springs/West WWTF 1000 West SR 434 Winter Springs, FL 32708	WAFR ID FLA011067	County Seminole	Entry Date 1/12/2021	Entry Time 09:00 AM
	Facility Phone # (407) 327-7579		Exit Date 1/12/2021	Exit Time 1:30 PM

LAT	28	°	42	'	16.69	"
LONG	81	°	19	'	12.87	"

Name(s) of Field Representatives(s) and Title William Culbert, Veolia Lead Operator Kevin M. Jones, Veolia Technical Manager	Operator Certification # B-26315	Email william.culbert@veolia.com kevin.jones@veolia.com	Phone 1-678-770-4839 1-813-983-2802
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Name & Address of Permittee / Designated Rep. Dale Smith City of Winter Springs 400 Old Sanford Oviedo Road Winter Springs, Florida 32708	Title Public Works and Utilities Director dsmith@winterspringsfl.org	Email Phone 407-327-5989
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Inspection Type	C	E	I		Samples Taken(Y/N): N	Sample ID#: N/A	Samples Split (Y/N) : N/A
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X Domestic ☐ **Industrial**

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IC	2. ♦ Compliance Schedules	NC	4. Sampling	IC	7. Flow Measurement	SC	10. ♦ Effluent Disposal
		NC	5. ♦ Records & Reports	NC	8. ♦ Operation & Maintenance	IC	11. Biosolids
						NC	12. ♦ Groundwater
NA	14. Other					NC	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) <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">Jenny E. Farrell </div> <div style="width: 30%;">Helena Dacenay </div> <div style="width: 30%;">Sean Boyles</div> </div>	District Office/Phone Number CD/407-897-4173	Date 3/19/2021
Name and Signature of Reviewer David Smicherko 	District Office/Phone Number Click or tap here to enter text.	Date 3/19/2021

Single Event Violations (*SNC SEVs)				
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<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
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<input checked="" 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 checked="" 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:

An existing 2.07 MGD annual average daily flow (AADF) permitted capacity dual-train contact stabilization domestic wastewater treatment plant (2.5 MGD design capacity for all units except the filters) consisting of influent screening, aeration, secondary clarification, filtration, chlorination, and aerobic digestion and dewatering of biosolids. Effluent flows can be land applied via the slow-rate public access reuse system (R-001), a slow-rate restricted public access reuse system (Sprayfield – R-002), or a rapid infiltration basin (RIB) system (R-003).

1. ♦Permit: Significant-Out-Of-Compliance

Current Permit available on-site?	Yes
Date Permit issued	January 21, 2014
Date Permit Expires	January 15, 2024
Permit Renewal Application due by	July 19, 2023
Administrative or Judicial Orders?	N/A

- 1.1 Deficiency: According to onsite personnel and comments reviewed in the operations and maintenance logbook, and discharge monitoring report (DMR) review it was evident that flow had been bypassing the filtration and chlorination systems in both November and December 2020 for multiple days due to the lack of flow reported for Total Plant Flow (FLW-1), which is located at the end of the chlorine contact chamber.**

Rule/Permit Reference: Rule 62-620.610(22), F.A.C. - (22) Bypass Provisions. (a) Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless the permittee affirmatively demonstrates that:

1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and,
2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and,
3. The permittee submitted notices as required under paragraph (22)(b), of this permit.

(b) If the permittee knows in advance of the need for a bypass, it shall submit prior notice to the Department, if possible at least 10 days before the date of the bypass. The permittee shall submit notice of an unanticipated bypass within 24 hours of learning about the bypass as required in subsection (20), of this permit. A notice shall include a description of the bypass and its cause; the period of the bypass, including exact dates and times; if the bypass has not been corrected, the anticipated time it is expected to continue; and the steps taken or planned to reduce, eliminate, and prevent recurrence of the bypass.

(c) The Department shall approve an anticipated bypass, after considering its adverse

effect, if the permittee demonstrates that it will meet the three conditions listed in subparagraphs (22)(a)1. through 3., of this permit.

(d) A permittee may allow any bypass to occur which does not cause reclaimed water or effluent limitations to be exceeded if it is for essential maintenance to assure efficient operation. These bypasses are not subject to the provision of paragraphs (22)(a) through (c), of this permit.

Corrective Action: During this inspection it appeared the facility was no longer in bypass of the filter or chlorine contact chamber. Routine updates provided by the facility provided reasonable assurance that full treatment and treatment unit recovery was not in the process of completion in these bypassed areas. **Provide the Department with steps on how a bypass situation will be handled in the future at this location in order to maintain compliance with the provision in Rule 62-620.610(22).**

- 1.2 Observation: A permit revision was issued on March 5, 2015 to reduce sampling frequency for R-001.
- 1.3 Observation: A permit revision was issued on March 12, 2020 to allow for the replacement of the existing screens (with new static influent screens), refurbish the aeration diffuser equipment, and complete steel tank/wall repairs.

2. ♦ Compliance Schedules: In-Compliance

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

- 2.1 Observation: According to the 8/8/2017 inspection report, the Item #1 – Improvement Action was completed the first week of September 2017. Item #2 – Capacity Analysis Report was last submitted to the Department on December 12, 2018.

3. Laboratory: Not Evaluated

- 3.1 Observation: This item was evaluated during an additional site visit conducted on January 28, 2021.

4. Sampling: Out-of-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 **Deficiency: When flows were in bypass of FLW-1, the final effluent monitoring point (EFA-1) was in bypass, which is located at the end of the chlorine contact chamber.**

Rule/Permit Reference: Permit Condition I.A.2, 13, & 19 - Reclaimed water samples shall be taken at the monitoring site locations listed in Permit Condition I.**Error! Reference source not found..Error! Reference source not found..** and as described below:

Monitoring Site Number	Description of Monitoring Site
FLW-2	Flow to public access reuse, calculated by adding FLW-4 and 6
FLW-4	Flow to Central Winds public access
FLW-5	Flow from reclaimed water distribution pump station
FLW-6	Flow to residential irrigation and other, FLW-6 equals FLW-5 minus 4, 8, 9, 10, and 7
EFA-1	Chlorine contact chamber effluent
EFB-1	Filter effluent prior to chlorination
FLW-11	Flow (at Lake Jessup Inlet) minus water used for backwashing filters
EFB-3	Solids, Total Suspended (Lake water)
EFA-2	Total Residual (for Disinfection) after High Pressure Service Pumps
FLW-12	Flow to West WRF Reclaimed Water Distribution System minus any re-pumped water

Corrective Action: During this inspection it appeared the facility was no longer in bypass of the filter or chlorine contact chamber. Routine updates provided by the facility provided reasonable assurance that full treatment and treatment unit recovery was not in the process of completion in these bypassed areas. **Provide the Department with steps on how a bypass situation will be handled in the future at this location in order to maintain compliance with the provision in Rule 62-620.610(22).**

- 4.2 **Observation:** Influent and effluent compositors were noted onsite at the time of inspection at the appropriate monitoring locations.
- 4.3 **Observation:** *pH Meter* – The inline pH meter is a Rosemont 1056 pH meter. The meter appeared operational at the time of inspection.
- 4.4 **Observation:** *Total Residual Chlorine (TRC) Meter* – The inline TRC meter is a HACH CL-17 meter. The meter appeared operational at the time of inspection.
- 4.5 **Observation:** *Turbidity Meter* – The inline turbidity meter is an HF Scientific MicroTOL meter. The meter appeared operational at the time of inspection.
- 4.6 **Observation:** The following documentation was reviewed during additional site visits conducted on 1/28/2021 and 2/4/2021: inline/bench meter comparison sheets, calibration/verification records, thermometer calibrations, composite sampler maintenance records, and strip chart data.

5. ♦ **Records and Reports: Out-of-Compliance**

Documents/Records reviewed	Time frame
Discharge Monitoring Reports (DMRs)	From February 2020 to January 2021

- 5.1 **Deficiency:** Facility failed to report several abnormal events and/or malfunctions (unauthorized discharges, effluent exceedances, and treatment bypasses) during the months of November and December 2020 to the Department as required.

Rule/Permit Reference: Rule 62-620.610(20), F.A.C. - The permittee shall report to the Department's Central District Office any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain: a description of the noncompliance and its cause; the period of noncompliance including exact dates and time, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

- a. The following shall be included as information which must be reported within 24 hours under this condition:
 - (1) Any unanticipated bypass which causes any reclaimed water or effluent to exceed any permit limitation or results in an unpermitted discharge,
 - (2) Any upset which causes any reclaimed water or the effluent to exceed any limitation in the permit,
 - (3) Violation of a maximum daily discharge limitation for any of the pollutants specifically listed in the permit for such notice, and
 - (4) Any unauthorized discharge to surface or ground waters.
- b. Oral reports as required by this subsection shall be provided as follows:
 - (1) For unauthorized releases or spills of treated or untreated wastewater reported pursuant to subparagraph (a)4. that are in excess of 1,000 gallons per incident, or where information indicates that public health or the environment will be endangered, oral reports shall be provided to the STATE WARNING POINT TOLL FREE NUMBER (800) 320-0519, as soon as practical, but no later than 24 hours from the time the permittee becomes aware of the discharge. The permittee, to the extent known, shall provide the following information to the State Warning Point:
 - (a) Name, address, and telephone number of person reporting;
 - (b) Name, address, and telephone number of permittee or responsible person for the discharge;
 - (c) Date and time of the discharge and status of discharge (ongoing or ceased);
 - (d) Characteristics of the wastewater spilled or released (untreated or treated, industrial or domestic wastewater);
 - (e) Estimated amount of the discharge;
 - (f) Location or address of the discharge;
 - (g) Source and cause of the discharge;
 - (h) Whether the discharge was contained on-site, and cleanup actions taken to date;
 - (i) Description of area affected by the discharge, including name of water body affected, if any; and
 - (j) Other persons or agencies contacted.
 - (2) Oral reports, not otherwise required to be provided pursuant to subparagraph b.1 above, shall be provided to the Department's Central District Office within 24 hours from the time the permittee becomes aware of the circumstances.

- c. If the oral report has been received within 24 hours, the noncompliance has been corrected, and the noncompliance did not endanger health or the environment, the Department's Central District Office shall waive the written report.

Corrective Action: Since November and December 2020 abnormal events/malfunions have been routinely reported to the Department as required.

Provide the Department with documentation regarding long term changes that will be implemented to ensure proper reporting will be completed as required.

5.2 Deficiency: During the DMR review the flowing reporting/transcription errors were noted, see below:

Monitoring Period	DMR Part	Reporting/Transcription Error
February 2020	A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Annual and Monthly Average calculated/reported incorrectly • TSS (EFA-1) values do not match between Part A & B • TSS (EFA-1) Monthly Average calculated/reported incorrectly • Fecal Coliform Geo Metric Mean calculated/reported incorrectly
March 2020	A & B	<ul style="list-style-type: none"> • CBOD (EFA-1) Annual Average calculated/reported incorrectly • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • TSS (EFA-1) values do not match between Part A & B • TSS (EFA-1) Monthly Average calculated/reported incorrectly • Fecal Coliform Geo Metric Mean calculated/reported incorrectly
April 2020	A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Annual and Monthly Average calculated/reported incorrectly • Total Phosphorus (TP) values do not match between Part A & B

		<ul style="list-style-type: none"> • % Capacity was calculated/reported incorrectly • R-002 – TSS Maximum and Monthly Average did not match between Part A & B
May 2020	A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Annual and Monthly Average calculated/reported incorrectly • % Capacity was calculated/reported incorrectly • R-002 – TSS Maximum and Monthly Average did not match between Part A & B • Fecal Coliform Geo Metric Mean calculated/reported incorrectly
June 2020	A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Annual Average calculated/reported incorrectly • % Capacity was calculated/reported incorrectly • R-003 – TSS Maximum and Monthly Average did not match between Part A & B • Fecal Coliform Geo Metric Mean calculated/reported incorrectly
July 2020	A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Annual and Monthly Average calculated/reported incorrectly • % Capacity was calculated/reported incorrectly • R-002 – TSS Maximum and Monthly Average did not match between Part A & B • Fecal Coliform Geo Metric Mean calculated/reported incorrectly

August 2020	A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Annual and Monthly Average calculated/reported incorrectly • % Capacity was calculated/reported incorrectly • R-002 – TSS Maximum and Monthly Average did not match between Part A & B • Fecal Coliform Geo Metric Mean calculated/reported incorrectly
September 2020	A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Weekly Average calculated/reported incorrectly • TSS Maximum did not match between Part A & B • TSS (EFA-1) Weekly and Monthly Average calculated/reported incorrectly • Fecal Coliform Geo Metric Mean calculated/reported incorrectly
October 2020	A, B, & D	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Annual and Monthly Average calculated/reported incorrectly • TSS (EFA-1) Annual Average calculated/reported incorrectly • MWC-I reported as 0 for all parameters, noted the well was damaged but the proper code should be utilized – OTH or ANC
*November 2020	Part A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • CBOD (EFA-1) Annual Average calculated/reported incorrectly • TSS (EFA-1) Annual and Monthly Average calculated/reported incorrectly • % Capacity was calculated/reported incorrectly

		<ul style="list-style-type: none"> • Multiple Parameters were marked as exceedances on Part A, but an exceedance was not noted on Part B. • Turbidity was reported above the 2.0 NTU reject setpoint for the entire monitoring period • FLW-7 Monthly Average did not match between Part A & B • Total Nitrogen (TN) Annual Average calculated/reported incorrectly • Fecal Coliform Geo Metric Mean calculated/reported incorrectly
December 2020	A & B	<ul style="list-style-type: none"> • Fecal coliform (R-002), FLW-2, and FLW-5 were marked as exceedances on Part A, but an exceedance was not noted on Part B. • CBOD (EFA-1) Annual and Weekly Average calculated/reported incorrectly • TP Annual Average calculated/reported incorrectly • TN and TP Monthly Average did not match between Part A & B • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • FLW-7 Monthly Average did not match between Part A & B
January 2021	A & B	<ul style="list-style-type: none"> • Influent CBOD & TSS reported as Monthly Average, the DMR requires the Maximum be reported • % Capacity was calculated/reported incorrectly • Multiple Parameters were marked as exceedances on Part A, but an exceedance was not noted on Part B or exceedance count was incorrect. • Total Nitrogen and TP Monthly Average did not match between Part A & B • Turbidity was reported above the 2.0 NTU reject setpoint for the entire monitoring period • TSS Annual Average calculated/reported incorrectly • Fecal Colifom reported as “0” on Part B for January 6, 2021

		<ul style="list-style-type: none"> Fecal Coliform Geo Metric Mean calculated/reported incorrectly
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***Resubmitted on March 2, 2021**

Rule/Permit Reference: Rule 62-620.610(18)(a), F.A.C. - Monitoring results shall be reported at the intervals specified elsewhere in this permit and shall be reported on a Discharge Monitoring Report (DMR), DEP Form 62-620.910(10), or as specified elsewhere in the permit.

Corrective Action: **Ensure data on the DMR's are routinely calculated and reported correctly.**

5.3 Deficiency: Current operating protocol was not available at the time of inspection.

Rule/Permit Reference: Rule 62-610.320(6) (a), F.A.C. - An operating protocol is a document which describes how a domestic wastewater facility is to be operated to ensure that only reclaimed water that meets applicable standards is released to a reuse system. It is a detailed set of instructions for the operators of the facilities. It may be part of the operation and maintenance manual or it may be a separate document.

Corrective Action: A copy of the current operating protocol on file with the Department was sent via email to the facility on January 13, 2021. **Provide the Department with information on training improvements and potential updates that will be made to ensure the approved operating protocol will be implemented appropriately in the future.**

5.4 Deficiency: According to Department records the last Annual Reuse Report submitted to the Department was in 2018. This report is due annually on January 1st of each year.

Rule/Permit Reference: Rule 62-610.870(3)(b), F.A.C. - The annual report shall be delivered or mailed to these addresses on or before January 1 of each year.

Corrective Action: **Submit the 2019 and 2020 Annual Reuse Reports to the Department.**

5.5 Deficiency: According to Department records the last pathogen monitoring sampling event was conducted on August 31, 2017 and the report was submitted to the to the Department. This sampling is due bi-annually and should be submitted on DEP Form 62-610.300(4)(a)4.

Rule/Permit Reference: Rule 62-610.463(4)(a), F.A.C.- For treatment plants having capacities of 1.0 mgd or larger, the permittee shall sample the reclaimed water for Cryptosporidium and Giardia as follows:

1. Sampling shall be conducted at one time during each two-year period. Intervals between sampling shall not be greater than two years.
2. Samples shall be taken at a point immediately following the disinfection process.

Corrective Action: **Conduct the pathogen monitoring sampling and submit the results as the permit requires.**

5.6 Deficiency: Fecal Coliform grab not collected as often as required for R-001 on the November 2020 DMR.

Rule/Permit Reference: Permit Condition I.A.1 - During the period beginning on the effective date and lasting through the expiration date of this permit, the permittee is authorized to supplement reclaimed water with surface water and direct reclaimed water to Reuse System R-001. Such reclaimed water shall be limited and monitored by the permittee as specified below and reported in accordance with Permit Condition I.**Error! Reference source not found..**

Parameter	Units	Max/M in	Reclaimed Water Limitations		Monitoring Requirements			Notes
			Limit	Statistical Basis	Frequency of Analysis	Sample Type	Monitoring Site Number	
Coliform, Fecal	#/100mL	Max	25	Single Sample	4 days/week	Grab	EFA-1	

Corrective Action: According to the December 2020 and January 2021 DMR reviews sampling frequency for Fecal Coliform has been conducted as required. **No further response is needed at this time.**

- 5.7 Observation: According to Department records late DMR extension requests were received prior to the DMR due date for the December 2020 and January 2021 DMRs. The December 2020 DMR was received on February 26, 2021 and the January 2021 DMR was received on March 3, 2021.
- 5.8 Observation: The following documentation was reviewed during additional site visits conducted on 1/28/2021 and 2/4/2021: operator certifications, operations/maintenance logbook, effluent flow/data strip charts, reject logs, and operator daily data sheets.
- 5.9 Observation: Operation and Maintenance manuals were noted onsite at the time of inspection.
- 5.10 Observation: A bound and numbered logbook with operator entries was noted onsite at the time of inspection. The facility is staffed for at least 8 hours per day, 7 days per week as required.
- 5.11 Observation: The Reclaimed Water Effluent Analysis DMR was last submitted on via the EZDMR system in 2019. The 2020 submittal is due on or before June 28, 2021.

6. Facility Site Review: Out-of-Compliance

- 6.1 Deficiency: The following items were noted as deficiencies at the time of inspection:
- **Mixed liquor was noted to be discharging from a section of the aeration tank to the ground at the time of inspection (Picture #1 & #2).**
 - **Solids were noted on the surface of the clarifier in Plant #1(Picture #3).**
 - **Solids were noted in the clarifier weir in Plant #1(Picture #4).**
 - **Solids were noted on the surface of the sand filters (Picture #5).**
 - **Solids were noted in the Transfer Pump Station (Picture #6).**

Rule/Permit Reference: Rule 62-620.610(7), F.A.C. - All facilities and equipment necessary for the treatment, reuse, and disposal of domestic wastewater and biosolids shall be maintained, at a minimum, so as to function as intended. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control, and related appurtenances, that are installed and used by the permittee to achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit.

Corrective Action: **Provide the Department with what corrective actions have been and will be implemented to prevent these treatment system failures in the future.** During the inspection on January 28, 2021, it was noted that the solids in the Transfer Pump Station had been removed (Picture #16).

6.2 Deficiency: Excessive odors were noted to be coming from the wastewater treatment plant at the time of inspection.

Rule/Permit Reference: Rule 62-600.400(2)(a), F.A.C. New treatment plants and modifications to existing plants shall be designed and located on the site so as to minimize adverse effects resulting from odors, noise, aerosol drift and lighting. The permittee shall give reasonable assurance that the treatment plant or modifications to an existing plant shall not cause odor, noise, aerosol drift or lighting in such amounts or at such levels that they adversely affect neighboring residents, in commercial or residential areas, so as to be potentially harmful or injurious to human health or welfare or unreasonably interfere with the enjoyment of life or property, including outdoor recreation. Reasonable assurance may be based on such means as aeration, landscaping, treatment of vented gases, buffer zones owned or under the control of the permittee, chemical additions, prechlorination, ozonation, innovative structural design or other similar techniques and methods. All such design measures shall be included in the preliminary design or engineering report.

Corrective Action: Ensure that the wastewater treatment facility is operated to minimize excessive odors. **Provide the Department with corrective actions that will be implemented in the future to minimize excessive odors.**

- 6.3 Observation: *General* – The facility is currently under construction on the rehabilitation of Plant #2. This plant is currently off-line, and all flow is directed towards Plant #1. The facilities are designed as contact stabilization plants, but extended aeration is currently utilized for treatment.
- 6.4 Observation: *Headworks* – Plant #1 has a manual bar screen with a covered container for screenings removal.
- 6.5 Observation: *Biological Treatment* – The aeration sections of the ring plant were receiving enough air to keep contents mixed. Connections between the three aeration basins have been clogged due to the increased flow Plant #1 dislodging debris within the plant. Inspections to keep these connections open and debris removal are ongoing. Three blowers were noted onsite. The replacement of the main air header is currently out for bid and this work will be completed as soon as possible.
- 6.6 Observation: *Clarifiers* - The clarifier skimmer arm appeared operational at the time of inspection. **See additional notes in #6.1 above.**

- 6.7 Observation: Filters - The facility has two traveling bridge sand filters. A bypass pump was noted next to the filters, but it was not operational at the time of inspection. Filter backwash water was bypassing the in-plant lift station and going directly to the reject pond. **See additional notes in #6.1 above.**
- 6.8 Observation: Disinfection – There are two chlorine contact chambers (CCC). Both CCCs were online at the time of inspection. Turbid effluent was noted at the time of inspection (Picture #7).
- 6.9 Observation: Chemical storage & Addition – At the time of inspection a temporary polymer feed had been sent up to address the solid settling issue. The polymer feed addition was located in the stilling well of the Plant #1 clarifier. The facility uses sodium hypochlorite (two tanks - 1200 gallons each) for disinfection.
- 6.10 Observation: Digesters/Dewatering – A digester is located in the ring plant. A portable press is used to dewater the biosolids; this is done routinely. All filtrate is returned to the plant.
- 6.11 Observation: Generator – A generator is located onsite and tested routinely under load.

7. **Flow Measurement:** In-Compliance

Flow meter present and location as per permit?	Yes
Easy access to flow meter?	Yes
Date of last flow meter calibration	See observation below

- 7.1 Observation: Flow meter documentation was reviewed during additional site visits conducted on 1/28/2021 and 2/4/2021.

8. **♦Operation and Maintenance:** Significant-Out-Of-Compliance

Facility being operated as per permit?	Yes
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- 8.1 **Deficiency:** According to notes in the current operations and maintenance logbook and November 2020 DMR review the system had bypassed the filters and chlorine contact chamber which was not operating the system as designed. **Rule/Permit Reference:** Rule 62-620.610(7), F.A.C. All facilities and equipment necessary for the treatment, reuse, and disposal of domestic wastewater and biosolids shall be maintained, at a minimum, so as to function as intended. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control, and related appurtenances, that are installed and used by the permittee to achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit.
Corrective Action: Provide the Department with operations staff training improvements that will be implemented to ensure proper operation of this treatment facility will be maintained at all times.
- 8.2 **Deficiency:** Multiple treatment plant failures were noted since the end of October 2020 when the facility diverted all flows to Plant #1, for the construction work in Plant #2, see below:
- Multiple clogs in internal tank piping due to accumulated grit/debris in Plant #1
 - Main air header failure due to underground corrosion in piping

- **Plant #1 clarifier drive unit failures**

Rule/Permit Reference: Rule 62-620.610(7), F.A.C. All facilities and equipment necessary for the treatment, reuse, and disposal of domestic wastewater and biosolids shall be maintained, at a minimum, so as to function as intended. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control, and related appurtenances, that are installed and used by the permittee to achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit.

Corrective Action: **Provide the Department with preventative maintenance plans and procedures that have and will be implemented to prevent these events in the future.**

- 8.3 Observation: At the time of inspection the facility operations staff were utilizing the treatment train as designed and performing clean-up actions of downstream treatment units in order to bring the facility back into compliance.

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

DMRs review period	From February 2020 to January 2021
Any exceedances?	Yes – See Table Below

- 9.1 Deficiency: The following effluent exceedances were noted by the Department during the DMR file review:

Monitoring Period	Parameter	Monitoring Site	Monitoring Location	Result	Limit
April 2020	Fecal Coliform Maximum	R001	EFA-1	60 #/100mL	25 #/100mL
November 2020	Total Suspended Solids (TSS) Maximum	R001	EFB-1	153 mg/L*(9)	5.0 mg/L
	CBOD Monthly Average	R001, R002, R003	EFA-1	32.8 mg/L	30.0 mg/L
	CBOD Weekly Average	R002	EFA-1	41.5 mg/L	40.0 mg/L
	CBOD Maximum	R001, R002, R003	EFA-1	76.0 mg/L	60.0 mg/L
	pH Minimum	R001, R002, R003	EFA-1	5.74 s.u.	6.0 s.u.
	Total Residual Chlorine Minimum	R001	EFA-1	0.0 mg/L* (13)	1.0 mg/L
		R002, R003	EFA-1	0.0 mg/L* (11)	0.5 mg/L

	Total Suspended Solids Monthly Average	R002, R003	EFA-1	62.6 mg/L	30.0 mg/L
	Total Suspended Solids Weekly Average	R002, R003	EFA-1	173 mg/L	45.0 mg/L
	Total Suspended Solids Maximum	R002, R003	EFA-1	173 mg/L	60.0 mg/L
December 2020	CBOD Monthly Average	R001, R002, R003	EFA-1	43.5 mg/L	30.0 mg/L
	CBOD Weekly Average	R001, R003	EFA-1	99.5 mg/L	45.0 mg/L
		R002	EFA-1	99.5 mg/L	40.0 mg/L
	CBOD Maximum	R001, R002, R003	EFA-1	123 mg/L	60.0 mg/L
	Total Suspended Solids Maximum	R001	EFA-1	182 mg/L*(12)	5.0 mg/L
	pH Minimum	R001, R002, R003	EFA-1	4.72 s.u.*(15)	6.0 s.u.
	pH Maximum	R001, R002, R003	EFA-1	11.66 s.u.*(15)	8.5 s.u.
	Total Residual Chlorine Minimum	R001	EFA-1	0.0 mg/L*(4)	1.0 mg/L
		R002, R003	EFA-1	0.0 mg/L*(4)	0.5 mg/L
	Total Suspended Solids Monthly Average	R002, R003	EFA-1	<43.9 mg/L	30.0 mg/L
	Total Suspended Solids Weekly Average	R002, R003	EFA-1	151 mg/L*(12)	45.0 mg/L
	Total Suspended Solids Maximum	R002, R003	EFA-1	151 mg/L*(12)	60.0 mg/L
January 2021	CBOD Annual Average	R001, R002, R003	EFA-1	35.1 mg/L	20.0 mg/L
	CBOD Monthly Average	R001, R002, R003	EFA-1	35.1 mg/L	30.0 mg/L
	CBOD Weekly Average	R001, R003	EFA-1	50.2 mg/L	45.0 mg/L
		R002	EFA-1	50.2 mg/L	40.0 mg/L

Total Suspended Solids Maximum	R001	EFB-1	332 mg/L*(13)	5.0 mg/L
Fecal Coliform Maximum	R001	EFA-1	>20,000 #/100mL	25 #/100mL
	R002, R003	EFA-1	>20,000 #/100mL	800 #/100mL
Fecal Coliform % Non-Detectable	R001	EFA-1	67%	75%
pH Minimum	R001, R002, R003	EFA-1	5.95 s.u.	6.0 s.u.
pH Maximum	R001, R002, R003	EFA-1	9.25 s.u.*(2)	8.5 s.u.
Total Residual Chlorine Minimum	R001	EFA-1	0.0 mg/L*(18)	1.0 mg/L
	R002, R003	EFA-1	0.0 mg/L*(17)	0.5 mg/L
Total Suspended Solids Monthly Average	R002, R003	EFA-1	<58.5 mg/L	30.0 mg/L
Total Suspended Solids Weekly Average	R002, R003	EFA-1	204 mg/L	45.0 mg/L
Total Suspended Solids Maximum	R002, R003	EFA-1	204mg/L	60.0 mg/L

* Denotes that the permit limit exceeded multiple times during the monitoring review period.

Rule/Permit Reference: Permit Conditions I.A.1, 12, & 18: See the Parameter and Limit Column in the Deficiency Description Table listed above.

Corrective Action: Ensure the facility is operated and maintained to meet the current permit limits. **Provide the Departments with corrective actions on how effluent limitations will consistently be met for all required parameters.**

- 9.2 Deficiency:** During the DMR review it was noted that substandard public access reuse water was discharged to the public access reuse system multiple days in November 2020, December 2020, and January 2021. During this time, it did not appear that the substandard effluent reject procedures were followed as per the current operating protocol on file with the Department.

Rule/Permit Reference: Rule 62-610.463 (2), F.A.C.: The treatment facility shall include continuous on-line monitoring for turbidity before application of the disinfectant. Continuous on-line monitoring of total chlorine residual or for residual concentrations of other disinfectants, if used, shall be provided at the compliance monitoring point. Instruments for continuous on-line monitoring of turbidity and disinfectant residuals shall be equipped with an automated data logging or recording

device. Continuous on-line monitoring instruments shall be calibrated according to the requirements of Chapters 62-160 and 62-601, F.A.C. Continuous on-line monitoring instruments shall be maintained according to the manufacturer's operation and maintenance instructions. In accordance with Rule 62-610.320, F.A.C., the permittee shall develop, and the Department shall approve, an operating protocol designed to ensure that the high-level disinfection criteria will be met before the reclaimed water is released to the system storage or to the reclaimed water reuse system. The operating protocol shall be reviewed and updated as required in Rule 62-610.320, F.A.C. Reclaimed water produced at the treatment facility that fails to meet the criteria established in the operating protocol shall not be discharged into system storage or to the reuse system. Such substandard reclaimed water (reject water) shall be either stored for subsequent additional treatment or shall be discharged to another permitted reuse system requiring lower levels of preapplication treatment or to a permitted effluent disposal system.

Corrective Action: Provide the Department with operating protocol updates and operations staff training plans to ensure these events will not occur in the future.

- 9.3 Observation: *pH In-line Meter Reading* – 7.35 s.u.
- 9.4 Observation: *TRC In-line Meter Reading* – > 5.00 mg/L
- 9.5 Observation: *Turbidity In-line Meter Reading* – 10.40 NTU

10. ♦Effluent Disposal: Significant-Out-Of-Compliance

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

- 10.1 Deficiency: According notes to the operations and maintenance logbook the facility failed to operate the effluent land application disposal system as designed, see below:**

- **Substandard effluent was sent to the public access reuse system.**
- **Substandard effluent was sent to the public access reuse north pond and public access reuse ground storage tank.**

Rule/Permit Reference: Rule 62-620.610(7), F.A.C. All facilities and equipment necessary for the treatment, reuse, and disposal of domestic wastewater and biosolids shall be maintained, at a minimum, so as to function as intended. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control, and related appurtenances, that are installed and used by the permittee to achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit.

Corrective Action: Provide the Department with operating protocol updates and operations staff training plans to ensure these events will not occur in the future.

- 10.2 Deficiency: Solids were noted in the Dayron RIBs during an additional site visit on January 13, 2021 (Picture #8, #9, & #10) by the Department**

Rule/Permit Reference: Rule 62-610.523(6) & (7), F.A.C.-Rapid infiltration basins shall be routinely maintained to control vegetation growth and to maintain percolation capability by scarification or removal of deposited solids. Basin bottoms shall be maintained to be level.

Corrective Action: **Provide the Department with corrective actions for the restoration of these RIBs as required.**

- 10.3 Observation: At the time of inspection the golf course public access reuse storage ponds (located east of the WWTF) appeared to have standing water, no unauthorized discharge was noted but onsite personnel stated that water was flowing over the concrete walkway and discharging to Lake Audubon in the southwest corner (Picture #11 & #12).

11. Biosolids: In-Compliance

- 11.1 Observation: The temporary dewatering unit was operational at the time of inspection. No problems or deficiencies were noted at the time of inspection in this area.
- 11.2 Observation: Hauling records were reviewed during the site visit on 2/4/2021.

12. ♦Groundwater Quality: Out-of-Compliance

DMRs review period	From 2020 QTR 1 to 2020 QTR 4
Any exceedances?	Yes
All monitoring wells accessible, secured & locked?	See Observation #12.3

- 12.1 **Deficiency:** The following groundwater exceedances were noted by the Department during the DMR file review:

Monitoring Period	Parameter	Monitoring Well Number	Result	Limit
2020 QTR 1	Fecal Coliform	MWC-4	45 #/100mL	4 #/100mL
2020 QTR 1	pH	MWC-5	5.4 s.u.	6.5 s.u.
2020 QTR 2	Fecal Coliform	MWC-2	6 #/100mL	4 #/100mL
2020 QTR 2	Fecal Coliform	MWC-4	10 #/100mL	4 #/100mL
2020 QTR 2	Fecal Coliform	MWC-5	9 #/100mL	4 #/100mL
2020 QTR 3	Fecal Coliform	MWC-4	45 #/100mL	4 #/100mL
2020 QTR 3	pH	MWC-5	5.4 s.u.	6.5 s.u.
2020 QTR 4	Nitrate as N	MWC-2	620 mg/L	10 mg/L
2020 QTR 4	Fecal Coliform	MWC-2	84 #/100mL	4 #/100mL
2020 QTR 4	Nitrate as N	MWC-3	13.2 mg/L	10 mg/L
2020 QTR 4	pH	MWC-3	6.3 s.u.	6.5 s.u.

2020 QTR 4	Nitrate as N	MWC-4	13.2 mg/L	10 mg/L
2020 QTR 4	pH	MWC-4	6.3 s.u.	6.5 s.u.
2020 QTR 4	pH	MWC-5	6.1 s.u.	6.5 s.u.

Rule/Permit Reference: Permit Condition III.B.5 - The following parameters shall be analyzed for each of the monitoring well(s) identified in Permit Condition(s) III. B. 4:

Parameter	Compliance Well Limit	Units	Sample Type	Monitoring Frequency
Water Level Relative to Feet, NGVD	Report	Feet	In Situ	Quarterly
Nitrogen, Nitrate, Total (as N)	10	mg/L	Grab	Quarterly
Solids, Total Dissolved (TDS)*	500	mg/L	Grab	Quarterly
Chloride (as Cl)	250	mg/L	Grab	Quarterly
Coliform, Fecal	4	#/100mL	Grab	Quarterly
pH	6.5-8.5	SU	Grab	Quarterly
Turbidity, Lab. – Nephelometric	Report	NTU	Grab	Quarterly

Corrective Action: Provide the Department with corrective actions of the groundwater exceedances noted during this DMR review period.

12.2 Deficiency: According to notes on the 2020 Quarter 4 DMR, MWI-5 has been damaged and samples could not be collected.

Rule/Permit Reference: Rule 62-520.600 & 62-4.070(3), F.A.C.- If any monitoring well becomes damaged or cannot be sampled for some reason, the permittee shall notify the Department's Central District, Ground Water Section immediately and a written report shall follow within seven days detailing the circumstances and remedial measures taken or proposed. Repair or replacement of monitoring wells shall be approved in advance by the Department's Central District, Ground Water Section.

Corrective Action: Provide the Department with a written report detailing the circumstances, remedial measures, and associated dates of completion that will be taken or proposed to repair/replace MWI-5 to ensure samples can be collected as required in the permit.

12.3 Observation: Groundwater monitoring wells were not evaluated as part of this inspection.

13. ♦SSO Survey: Out-of-Compliance

- 13.1 Deficiency:** The Department has issued a Warning Letter on January 5, 2021 to address chronic spills. The Department and the City met on February 12, 2021, the further enforcement actions that will be taken at this time for the January 2, 2021 unauthorized discharge. At the time of this meeting it was discussed with the City that a revised/updated final written report be submitted for this unauthorized discharge. According to Department records this information has not been received.

Rule/Permit Reference: Rule 62-620.610(11), F.A.C. - When requested by the Department, the permittee shall within a reasonable time provide any information required by law which is needed to determine whether there is cause for revising, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. The permittee shall also provide to the Department upon request copies of records required by this permit to be kept. If the permittee becomes aware of relevant facts that were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be promptly submitted, or corrections promptly reported to the Department.

Corrective Action: Submit the revised/updated final written report for the unauthorized discharge the occurred on January 2, 2021.

- 13.2 Observation:** The Department conducted a complaint inspection on January 6, 2021 and additional violations were noted during that inspection. See the attached complaint inspection for additional details.

14. Other: Not Applicable

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTEWATER COMPLIANCE INSPECTION REPORT

Facility Name and Physical Address Winter Springs/West WWTF 1000 West SR 434 Winter Springs, FL 32708	WAFR ID FLA011067	County Seminole	Entry Date 1/28/2021	Entry Time 09:30 AM
	Facility Phone # (407) 327-7579		Exit Date 1/28/2021	Exit Time 3:30 PM

LAT	28	°	42	'	16.69	"
LONG	81	°	19	'	12.87	"

Name(s) of Field Representatives(s) and Title Dale Smith, Public Works & Utilities Director Kevin M. Jones, Veolia Technical Manager	Operator Certification #	Email dsmith@winterspringsfl.org kevin.jones@veolia.com	Phone 407-327-5989 1-813-983-2802
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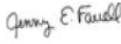
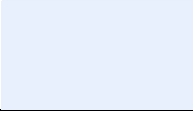

Name & Address of Permittee / Designated Rep. Dale Smith City of Winter Springs 400 Old Sanford Oviedo Road Winter Springs, Florida 32708	Title Public Works and Utilities Director dsmith@winterspringsfl.org	Email Phone 407-327-5989
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Inspection Type	R	I			Samples Taken(Y/N): N	Sample ID#: N/A	Samples Split (Y/N) : N/A
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X Domestic ☐ **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
NE	1. ♦ Permit	IC	3. Laboratory	NC	6. Facility Site Review	NE	9. ♦ Effluent Quality
NE	2. ♦ Compliance Schedules	NC	4. Sampling	NE	7. Flow Measurement	NE	10. ♦ Effluent Disposal
		NC	5. ♦ Records & Reports	IC	8. ♦ Operation & Maintenance	NE	11. Biosolids
						NE	12. ♦ Groundwater
NE	14. Other					NE	13. ♦ SSO Survey

Facility and/or Order Compliance Status:	<input type="checkbox"/> In-Compliance	<input checked="" type="checkbox"/> Out-Of -Compliance	<input type="checkbox"/> Significant-Out-Of-Compliance
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Recommended Actions: Warning Letter			
Name(s) and Signature(s) of Inspector(s) Jenny E. Farrell 	District Office/Phone Number CD/407-897-4173	Date 3/9/2021	
 Helena Dacenay 			
Name and Signature of Reviewer David Smicherko 	District Office/Phone Number 4070-897-4169	Date 3/19/2021	

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 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:

An existing 2.07 MGD annual average daily flow (AADF) permitted capacity dual-train contact stabilization domestic wastewater treatment plant (2.5 MGD design capacity for all units except the filters) consisting of influent screening, aeration, secondary clarification, filtration, chlorination, and aerobic digestion and dewatering of biosolids. Effluent flows can be land applied via the slow-rate public access reuse system (R-001), a slow-rate restricted public access reuse system (Sprayfield – R-002), or a rapid infiltration basin (RIB) system (R-003).

- 1. ♦ Permit:** Not Evaluated
- 2. ♦ Compliance Schedules:** Not Evaluated
- 3. Laboratory:** In-Compliance

Contract Lab Name and Certification #	Pace Analytical Services – Ormond Beach #E83509
Facility NELAC Certification #	Not Applicable

3.1 Observation: The documentation provided at the time of inspection was current.

4. Sampling: Out-of-Compliance

4.1 Deficiency: At the time of inspection in-line and bench field meter comparisons were reviewed for November and December 2020. The following items were noted that are in need of correction:

- **Comparisons did not routinely meet DEP SOP FT1900 Acceptance Criteria for pH**
- **Daily comparison documents were routinely missing information/not legible**
- **Daily comparison documents contained missing/incorrect acceptance limits for pH, total residual chlorine (TRC), and turbidity**

Rule/Permit Reference: 62-160.210 (1) F.A.C. All persons that conduct or support field activities and field measurements shall follow the applicable procedures and requirements described the DEP SOP collections titled Standard Operating Procedures for Field Activities, DEP-SOP-001/01.

Corrective Action: **Ensure that all required documentation is routinely reported on the in-line meter and bench meter comparison sheets. Provide corrective actions for improvements in operations staff training.**

4.2 Observation: The following records were requested but not available at the time of inspection: Composite Maintenance Records, Bench Meter Calibration/Verification Records, Thermometer Certifications. These records were reviewed during the 2/11/2021 site visit.

5. ♦ Records and Reports: Out-of-Compliance

5.1 Deficiency: **The operation and maintenance logbook was reviewed during this inspection in more detail for the months of November and December 2020. During this review it was noted that several significant maintenance issues were**

ongoing at this facility and the entries recorded were very inconsistent, vague, and did not provide clarity.

Rule/Permit Reference: Rule 62-602.650(4), F.A.C. - Domestic wastewater treatment plant operators shall maintain a separate operation and maintenance (O&M) log for each domestic wastewater treatment plant, and water treatment plant operators shall maintain a separate O&M log for each water treatment plant. The plant O&M log shall be maintained on site at the plant in a location accessible to 24-hour inspection and protected from weather damage. The plant O&M log shall be maintained in a hard-bound book with consecutive page numbering, or alternatively, part or all of the plant O&M log may be maintained electronically upon written request by the permittee or supplier of water and written approval by the appropriate Department district office, delegated local program, or approved county health department (ACHD). Department district offices, delegated local programs, and ACHDs shall approve partial or complete electronic plant O&M logs if the permittee or supplier of water demonstrates that required data will remain accessible to 24-hour inspection and protected from weather damage; that adequate data storage capacity and data backup will be provided; that entries made by recording equipment will be date/time stamped; and that entries made by an operator will be date/time stamped and accompanied by an electronic signature unique to, and under the sole control of, the operator. The plant O&M log shall be maintained current to the last operation and maintenance performed and shall contain a minimum of the previous three months of data at all times. The plant O&M log shall contain the following information, which shall be entered in the O&M log during each plant visit before leaving the plant:

- (a) Identification of the plant;
- (b) The signature and license number of the operator making any entries;
- (c) Date and time in and out of the plant;
- (d) Description of specific plant operation and maintenance activities, including any preventive maintenance or repairs made or requested;
- (e) Results of tests performed and samples taken, unless documented on a laboratory sheet;
- (f) Notation of any notification or reporting completed in accordance with subsection 62-602.650(3), F.A.C.

Corrective Action: Ensure operations and maintenance entries met the requirements of Rule 62-602.650(4), F.A.C. Provide the Department with what improvements will be made to operations staff training in regards to improving entries recorded in the operations and maintenance logbook.

6. Facility Site Review: Out-of-Compliance

6.1 Deficiency: Solids were noted on the surface of the clarifier and weir of Plant #1 (Picture #13).

Rule/Permit Reference: Rule 62-620.610(7), F.A.C. - All facilities and equipment necessary for the treatment, reuse, and disposal of domestic wastewater and biosolids shall be maintained, at a minimum, so as to function as intended. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control, and related appurtenances, that are installed and used by the permittee to

achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit.

Corrective Action: Provide the Department with what corrective actions have been and will be implemented to prevent these treatment system failures in the future.

6.2 Observation: Odors were noted at the time of inspection from the wastewater treatment facility. It was noted that a chemical addition was occurring at the influent screenings unit to address this issue (Picture #14).

6.3 Observation: Effluent at the chlorine contact chamber was still turbid and the treatment adjustments and recovery are still ongoing (Picture #15).

7. Flow Measurement: Not Evaluated

8. ♦Operation and Maintenance: In-Compliance

8.1 Observation: At the time of inspection this facility was being operated as designed, all treatment units that are in need of cleaning and/or recovery personnel have a plan to complete and are providing routine updates.

9. ♦Effluent Quality: Not Evaluated

10. ♦Effluent Disposal: Not Evaluated

11. Biosolids: Not Evaluated

12. ♦Groundwater Quality: Not Evaluated

13. ♦SSO Survey: Not Evaluated

14. Other: Not Applicable



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF

Photo #: Picture #1
Date: Jan 12, 2021
Time: 10:49 AM
Captured by: Jenny E. Farrell

Details:

Mixed liquor was noted to be discharging to the ground from this area of the Plant #1 treatment tank.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF

Photo #: Picture #2
Date: Jan 12, 2021
Time: 10:51 AM
Captured by: Jenny E. Farrell

Details:

Mixed liquor discharging over the Plant #1 treatment tank wall.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF

Photo #: Picture #3
Date: Jan 12, 2021
Time: 11:04 AM
Captured by: Jenny E. Farrell

Details:

Solids were noted on the surface of the Plant #1 clarifier.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF

Photo #: Picture #4
Date: Jan 12, 2021
Time: 10:54 AM
Captured by: Jenny E. Farrell

Details:

Solids were noted in the Plant #1 clarifier weir.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF

Photo #: Picture #5
Date: Jan 12, 2021
Time: 11:14 AM
Captured by: Jenny E. Farrell

Details:

Solids were noted on the surface of the sand filtration units.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #6
Date: Jan 12, 2021
Time: 11:55 AM
Captured by: Jenny E. Farrell

Details:

Solids were noted in the transfer pump station which is located after the chlorine contact chamber and leads to the public access reuse system ground storage tank or effluent disposal system.



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #7
Date: Jan 12, 2021
Time: 11:35 AM
Captured by: Jenny E. Farrell

Details:

Effluent clarity in the chlorine contact chamber at the time of the January 12, 2021 inspection.



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #8
Date: Jan 14, 2021
Time: 1:30 PM
Captured by: Sean Boyles

Details:

Solids noted in the Dayron RIBs during a site visit on January 14, 2021.



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #9
Date: Jan 14, 2021
Time: 1:30 PM
Captured by: Sean Boyles

Details:

Solids noted in the Dayron RIBs during a site visit on January 14, 2021.



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #10
Date: Jan 14, 2021
Time: 1:30 PM
Captured by: Sean Boyles

Details:

Solids noted in the Dayron RIBs during a site visit on January 14, 2021.



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #11
Date: Jan 12, 2021
Time: 12:35 PM
Captured by: Jenny E. Farrell

Details:

Location were substandard public access reuse discharged over the concrete at the northern most corner of the abandoned golf course pond and enter Lake Audubon.



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #12
Date: Jan 12, 2021
Time: 12:34 PM
Captured by: Jenny E. Farrell

Details:

Location were substandard public access reuse discharged over the concrete at the northern most corner of the abandoned golf course pond and enter Lake Audubon.



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #13
Date: Jan 28, 2021
Time: 10:46 AM
Captured by: Jenny E. Farrell

Details:

At the time of the 1/28/2021 site visit solids were noted on the clarifier surface and in the weir.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #14
Date: Jan 28, 2021
Time: 10:44 AM
Captured by: Jenny E. Farrell

Details:

Chemical addition was noted to be occurring at the bar screen to assist with odor control.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #15
Date: Jan 28, 2021
Time: 10:30 AM
Captured by: Jenny E. Farrell

Details:

At the time of the 1/28/2021 site visit, picture of the effluent clarity at the end of the chlorine contact chamber.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA011067
Facility/Site Name: Winter Springs West WWTF



Photo #: Picture #16
Date: Jan 28, 2021
Time: 11:09 AM
Captured by: Jenny E. Farrell

Details:

During the January 28, 2021 site visit it was noted that the transfer pump station had solids removed.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTEWATER COMPLIANCE INSPECTION REPORT

Facility Name and Physical Address Winter Springs/West WWTF 1000 West SR 434 Winter Springs, FL 32708	WAFR ID FLA011067	County Seminole	Entry Date 2/11/2021	Entry Time 09:30 AM
	Facility Phone # (407) 327-7579		Exit Date 2/11/2021	Exit Time 3:30 PM

LAT	28	°	42	'	16.69	"
LONG	81	°	19	'	12.87	"

Name(s) of Field Representatives(s) and Title Dale Smith, Public Works & Utilities Director Kevin M. Jones, Veolia Technical Manager	Operator Certification #	Email dsmith@winterspringsfl.org kevin.jones@veolia.com	Phone 407-327-5989 1-813-983-2802
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Name & Address of Permittee / Designated Rep. Dale Smith City of Winter Springs 400 Old Sanford Oviedo Road Winter Springs, Florida 32708	Title Public Works and Utilities Director dsmith@winterspringsfl.org	Email Phone 407-327-5989
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Inspection Type	R	I			Samples Taken(Y/N): N	Sample ID#: N/A	Samples Split (Y/N) : N/A
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X Domestic ☐ **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
NE	1. ♦ Permit	NE	3. Laboratory	NE	6. Facility Site Review	NE	9. ♦ Effluent Quality
NE	2. ♦ Compliance Schedules	NC	4. Sampling	NC	7. Flow Measurement	NE	10. ♦ Effluent Disposal
		NC	5. ♦ Records & Reports	NE	8. ♦ Operation & Maintenance	IC	11. Biosolids
						NE	12. ♦ Groundwater
NE	14. Other					NE	13. ♦ SSO Survey

Facility and/or Order Compliance Status:	<input type="checkbox"/> In-Compliance	<input checked="" type="checkbox"/> Out-Of -Compliance	<input type="checkbox"/> Significant-Out-Of-Compliance
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Recommended Actions: Warning Letter			
Name(s) and Signature(s) of Inspector(s) <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> Jenny E. Farrell </div> <div style="width: 45%;"> Helena Dacenay </div> </div>	District Office/Phone Number CD/407-897-4173	Date 3/19/2021	
Name and Signature of Reviewer David Smicherko 	District Office/Phone Number 407-897-4169	Date 3/19/2021	

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 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:

An existing 2.07 MGD annual average daily flow (AADF) permitted capacity dual-train contact stabilization domestic wastewater treatment plant (2.5 MGD design capacity for all units except the filters) consisting of influent screening, aeration, secondary clarification, filtration, chlorination, and aerobic digestion and dewatering of biosolids. Effluent flows can be land applied via the slow-rate public access reuse system (R-001), a slow-rate restricted public access reuse system (Sprayfield – R-002), or a rapid infiltration basin (RIB) system (R-003).

- 1. ♦Permit:** Not Evaluated
- 2. ♦Compliance Schedules:** Not Evaluated
- 3. Laboratory:** Not Evaluated
- 4. Sampling:** Out-of-Compliance

4.1 Deficiency: The field meter calibration/verification logs were reviewed at the time of inspection and the following required information was not located on this documentation:

- **Lot Numbers of Standards**
- **Expiration Dates of Standards**
- **Serial Numbers of bench meter calibrated/verified**

Rule/Permit Reference: Rule 62-160.240 (1) F.A.C.: The record keeping requirements for entities that conduct or support field activities and field measurements are specified in the DEP SOPs contained in the following collections: DEP-SOP-001/01, which is incorporated by reference in paragraph 62-160.800(1)(a), F.A.C., including all parts and subparts of DEP SOP FD 1000, which is incorporated by reference in subparagraph 62-160.800(1)(a)3., and DEP-SOP-003/11, which is incorporated by reference in paragraph 62-160.800(1)(c), F.A.C., including all DEP SOPs, parts and subparts therein applicable to bioassessment field activities. The specified records shall contain sufficient information to allow independent reconstruction of all activities related to generating data that are submitted to the Department. These records shall be kept by the generator of the records for a minimum of five years after the date of generation or completion of the records unless otherwise specified in a Department contract, order, permit or Title 62 rules.

Corrective Action: **Provide the Department with corrective actions on how operations staff will be trained to ensure consistent documentation requirements are met.**

4.2 Deficiency: Routine composite sampler maintenance records could not be found at the time of inspection.

Rule/Permit Reference: 62-160.210 (1) F.A.C. All persons that conduct or support field activities and field measurements shall follow the applicable procedures and requirements described the DEP SOP collections titled Standard Operating Procedures for Field Activities, DEP-SOP-001/01 FS 1007 - Preventive maintenance activities are necessary to ensure that the equipment can be used to obtain the expected results and to avoid unusable or broken equipment while in the field.

Equipment is properly maintained when: It functions as expected during mobilization; and It is not a source of sample contamination (e.g., dust).

Corrective Action: Ensure routine preventative maintenance is conducted and documented to ensure this equipment functions as designed. **Provide the Department with a plan to maintain this equipment.**

- 4.3 Observation: Thermometer certifications were provided during this inspection and were documented to be within expiration.

5. ♦Records and Reports: Out-of-Compliance

- 5.1 **Deficiency: According to a review of the operation and maintenance logbook, the reject valve activity data, the monitoring strip chart data, and reject setpoint discussion, it appears that the several procedures were not being followed as outlined in the current Operating Protocol.**

Rule/Permit Reference: Rule 62-610.320(6) (a), F.A.C. - An operating protocol is a document which describes how a domestic wastewater facility is to be operated to ensure that only reclaimed water that meets applicable standards is released to a reuse system. It is a detailed set of instructions for the operators of the facilities. It may be part of the operation and maintenance manual or it may be a separate document.

Corrective Action: Ensure the current operating protocol is followed. **Provide the Department with a reviewed and revised copy of the operating protocol. Ensure operations personnel are trained properly on the revised copy once approved by the Department.**

- 5.2 **Deficiency: During the review of the effluent land application site disposal logs and the flow data reported on the November 2020 DMR, the Dayron RIB (FLW-8) flow values calculated on the disposal logs did not match values reported on Part B of the DMR.**

Rule/Permit Reference: Rule 62-620.610(18)(a), F.A.C. - Monitoring results shall be reported at the intervals specified elsewhere in this permit and shall be reported on a Discharge Monitoring Report (DMR), DEP Form 62-620.910(10), or as specified elsewhere in the permit.

Corrective Action: According to a revised November 2020 DMR submittal on March 2, 2021, these flow values have been recalculated, revised and resubmitted. **Provide the Department with corrective actions to ensure data inconsistencies will not occur on future DMRs.**

- 5.3 Observation: Current operator licenses were provided at the time of inspection.

6. Facility Site Review: Not Evaluated

7. Flow Measurement: Out-of-Compliance

- 7.1 **Deficiency: Current flow meter calibration documentation was not provided for all permitted compliance flow meters.**

Rule/Permit Reference: Rule 62-620.350(1), F.A.C. Unless the permit specifically indicates an alternative location, the permittee shall maintain the following records on the site of the permitted facility or activity and make them available for inspection:

(1) Records of all compliance monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, including, if applicable, a copy of the laboratory certification showing the certification number of the laboratory, for at least three years from the date the sample or measurement was taken.

Corrective Action: **Provide current calibrations records, for the compliance flow meters, to the Department.**

- 7.2 Observation: Flow meter calibration documentation was provided for Total Plant Flow Meter (FLW-1) and Reclaimed Water Distribution Pump Station (FLW-5). The last calibration date was July 28, 2020.

8. ♦Operation and Maintenance: Not Evaluated

9. ♦Effluent Quality: Not Evaluated

10. ♦Effluent Disposal: Not Evaluated

11. Biosolids: In-Compliance

- 11.1 Observation: Biosolids hauling records were available and reviewed at the time of inspection. Unstabilized biosolids are hauled to Compost USA BTF for further treatment.

12. ♦Groundwater Quality: Not Evaluated

13. ♦SSO Survey: Not Evaluated

14. Other: Not Applicable