

Sent via email to Michelle.Fish@dep.state.fl.us

May 10, 2011

Michelle Fish
Florida Department of Environmental Protection
Post Office Box 2549
Fort Myers, FL 33902-2549

Severn Trent Services
4837 Swift Road, Suite 100
Sarasota, FL 34231
United States

T: +1 941 925 3088
TF: +1 800 535 6832
F: +1 941 924 7203

www.severntrentservices.com

Re: Collier County – DW
Big Cypress Elementary WWTP – Permit No. FLA014131

Dear Ms. Fish:

The Collier County School Board and Severn Trent Environmental Services, Inc. (STES) are in receipt of the Department's letter regarding the referenced facility. We offer the following responses to the items noted in the Department's letter. For ease of review, the Department's comment is restated followed by the response.

1. The following required reports were not available at the time of the inspection. Please provide these documents to the Department, and maintain copies at the facility.
 - a. Backflow prevention device test certification
 - b. Laboratory certification
 - c. Flow meter calibration record
 - d. Sludge hauling records for 5 years

Response:

- a. The backflow prevention device test certification is attached to this letter and will be maintained at the facility.
 - b. The laboratory certification is attached to this letter and will be maintained on the plant site.
 - c. The flow meter calibration report is attached and will be maintained at the facility.
 - d. Please note STES started operating this facility in November 2010 and has not hauled sludge since this date. We requested sludge hauling records from the previous operator and have been provided with the attached information. Any additional information we are able to obtain on sludge hauling will be submitted to the Department under separate cover and will be maintained on the plant site.
2. The certified operator's daily logbook was not legible.

Response: This issue has been reviewed with the facility operator to ensure logbook entries are legible in the future.

3. A Residuals Annual Summary for the year 2010 was not received as of February 19, 2011 indicating that a violation of Florida Statutes and Rules may exist at the above-described facility.

Response: As noted above, sludge hauling information obtained from the previous facility operator is attached which appears to indicate that no sludge was hauled for this facility in 2010 and explains why a Residuals Annual Summary was not submitted to the Department.

4. A review of the Discharge Monitoring Reports revealed the following:
- Nitrogen exceedances were reported for March (27.6 mg/L), July (27.4 mg/L), August (26.7 mg/L), and December 2010 (17.6 mg/L).
 - Total suspended Solids exceedances were reported for March (18.9 mg/L), July (21.2 mg/L), and August 2010 (24.7 mg/L); and January 2011 (18.7 mg/L).
 - Qualifier codes should not be used on Part A of the DMR.

Response:

- STES started operating this facility in November 2010 and therefore cannot comment on nitrogen exceedances in March, July, and August 2010. The December 2010 nitrogen exceedance was reported as required on the DMR with the explanation that the elevated result was due to process adjustments with starting operations.
- STES started operating this facility in November 2010 and therefore cannot comment on total suspended solids (TSS) exceedances in March, July, and August 2010. The January 2011 TSS exceedance was reported as required on the DMR with the explanation that the elevated TSS was due to process adjustments with starting operations and the filters requiring maintenance.
- We believe this issue applies to the previous operator but qualifier codes will not be used on Part A of the DMR.

5. Safe access points for obtaining representative effluent samples were not available.

Response: Prechlorination and final effluent samples are obtained using pumps located in the filter effluent wet well and the chlorine contact chamber effluent pump station, respectively. The pictures on the next page show the pumps and the sampling locations.