D – 2:30 – 3:00

Conventional Systems and Commercial / IM Zone, ATU, and PBTS Operating Permits
Conventional Systems Requiring Commercial or I/M Zone Operating Permits

- Operating Permit Requirements for Commercial Wastewater Treatment Systems and I/M Zones.
- Annual Operating Permit System Inspections
- Maintenance Entities
- System Maintenance Requirements
When an Operating Permit is required:

• Where commercial wastewater is generated, or any wastewater is generated within an Industrial or Manufacturing area, an annual Operating Permit is required per 64E-6.003(5), FAC and 381.0065(4)(i)2.
• What if it is suspected that non-DOH regulated wastewater might enter the OSTDS?
  • Where appropriate, sampling can be required as a condition of operation – the details and frequency of the sampling are to be determined by the County Health Department.

By statute, these permits are valid for 1 (one) year, at the end of which, they must be applied for again: they are not renewed.
Based on these documents and regulations:

• Exempted from these requirements are systems that were in use prior to:
  • July 1, 1998 for systems that would require a Commercial Operating Permit (Memo 98-039).
  • July 5, 1989 for systems that would require an I/M Operating Permit [381.0065(4)(i2)].
• This exemption is only valid for as long as the original owner, system, and use remains unchanged. Examples of items that void this exemption are:
  • Change in ownership.
  • Change in estimated sewage flow.
  • New system installation.
  • System expansion or addition.
  • System repair.
  • Change in wastewater characteristics.
  • Change in wastewater strength.
  • Change in original permit conditions.
Operating Permit Application Considerations

- **DH4081** – Application for Onsite Sewage Treatment and Disposal System Operating Permit...and...
- **DH4081A** – Business Survey
- These forms:
  - Document the proposed operating conditions.
  - Must be amended prior to changes in operating conditions.
  - Are filled out each year, and reviewed for compliance with the original system approval.
  - Must be submitted with fees before an OSTDS receives final approval.
  - Must be reviewed and approved by the County Health Department annually prior to Issuing the Operating Permit.

Commercial and I/M Operating Permits are applied for on forms:
I/M and Commercial Operating Permits:

• The permits bear:
  – Permit Type
  – Permit Number
  – Permit Owner and Location
  – Conditions of Operation
  – Expiration Date
Annual Operating Permit: System Inspections

• In order to ensure compliance with the conditions of operation specified on a Commercial or I/M Operating permit, an annual inspection is required.

• These inspections serve to determine whether any changes have occurred which would require the permit conditions to be amended or the permit to be revoked.

• The standard for determining if such is required, is comparison of the existing conditions to those specified on the originally approved permit and application.
Commercial and I/M Operating Permits Annual Inspections:

• Annual site inspections are conducted to verify that the conditions of operation stated on the permit are not being exceeded.
• These inspections serve to document the operating conditions and determine if there have been any changes from the permitted and approved operating conditions.
  • These inspections are conducted annually by the CHD.
  • If the operating conditions have changed, an existing system evaluation and permit amendment is required.
  • If there is sufficient change in the operating conditions, a system modification, repair, new system installation, or denial of the permit may be required.
Performing the Annual Inspection:

• **Minimum requirements for the CHD’s annual inspection:**
  – At minimum, the County Health Department Inspector must verify that there is no change from:
    • The approved system construction.
    • The approved structure.
    • The approved conditions of operation.
  – The specifics for these items will differ based on the establishment being inspected.

**What are examples of different conditions of operation that should be inspected?**

Use the Operating Permit Inspection Form as a guide.
Operating Permit Inspection Form:

- General Information
- I/M or Equivalent Information
- Commercial Sewage Information
Maintenance Entities and Requirements

• Entities performing maintenance of these systems are the same that are authorized to install them.

• Minimum recommended maintenance for conventional systems in these circumstances is the same as for residential systems, but should occur more frequently depending on the operating conditions.
  – Pump the septic tank at least once every 3 to 5 years.
  – Service the outlet filter as needed between pump-outs.
  – Maintain the original site conditions as permitted and approved by the department.
  – Operate the system without exceeding the design parameters.
E - **ATU Construction and Operating Permits**
Operating Permit Requirements:

• By rule and statute, a Biennial Operating Permit is required prior to use of an ATU or PBTS.
  – The permit application, fee, and maintenance contract must be received by the County Health Department prior to final approval of system construction.
  – The permit must specify the operating conditions, including the sampling and testing requirements that must be provided by the design engineer.
  – The property owner is responsible for ensuring the operating permit is obtained, unless the approved maintenance entity has also contracted to do so.
    • The Maintenance Entity is then responsible for submitting the minimum number of reports to the DOH.
    • The operating permit is non-transferrable. At the time the owner of a residence or business changes, or a tenant of a business changes, a new permit must be applied for.
    • Operating permits are applied for, reviewed, and issued at the beginning of each permit cycle.
ATU and PBTS Operating Permits:

- The permits bear:
  - Permit Type
  - Permit Number
  - Permit Owner and Location
  - Conditions of Operation
  - Expiration Date

ATU and PBTS Operating Permits require multiple inspections throughout the permit cycle.
ATU and PBTS Annual Inspections:

- The minimum inspection and monitoring associated with the Operating Permit:
  - Is dependent on what level of treatment was deemed appropriate through the permitting process.
  - Is specified on the construction application and permit by the design engineer.
  - Must, at minimum, address the required operating parameters.
  - Must appear on the DOH Operating permit.
  - Is in addition to the annual site inspections by the CHD.
  - Must be carried out by an approved maintenance entity.

Minimum standards are summarized in memo 08-003.
Maintenance Entities:

• Before servicing a system, a Maintenance Entity must:
  – Be or employ a Registered Septic Tank Contractor, Licensed Plumber, or Class D Wastewater Plant Operator and:
    • Be trained by the manufacturer of each product they wish to service.
    • Obtain a Maintenance Entity Service Permit from the Health Department in the county where their business is based (Application form DH4066).
    • Sign a maintenance contract with the owner of each system they wish to service.
    • Obtain the Operating Permit for each system they wish to service (form DH4081).

• While a system is under their care:
  – The Maintenance entity must:
    • Service the system as prescribed by the manufacturer, and submit reports to the County Health Department where the system is located. The number of service reports to be submitted is 2 per year for residential, and 4 per year for commercial systems.
    • Respond to emergency calls within 36 hours, and notify the CHD of any emergency service to the system.
    • Report to the CHD when a property owner refuses to renew a maintenance contract, or when there must be an amendment to the permit.

Besides prescribed visits and monitoring or sampling requirements, the maintenance requirements are based on the manufacturer’s training.
**Memo HSES 08-003 INSPECTION AND MONITORING FOR ATU’S AND PBTS**

64E-6 FAC Summary

<table>
<thead>
<tr>
<th>PERFORMANCE STANDARDS</th>
<th>CONVENTIONAL SEPTIC SYSTEM</th>
<th>AEROBIC TREATMENT UNIT</th>
<th>&gt; 1500 gpd AEROBIC TREATMENT UNIT</th>
<th>SECONDARY TREATMENT STANDARDS</th>
<th>ADVANCED SECONDARY TREATMENT STANDARDS</th>
<th>ADVANCED WASTEWATER TREATMENT STANDARDS</th>
<th>FLOIRDA KEYS TREATMENT STANDARDS</th>
<th>OTHER*</th>
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<td>INSPECTION/ MAINTENANCE FREQUENCY</td>
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<td>1 x per year – CHD 2 x per year – ME</td>
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<td>not applicable</td>
<td>CBOD5 and TSS or Ponding Depth ¹ and Fecal Coliforms Semi-annually</td>
<td>Specifications To Be Set By Design Engineer ²</td>
<td>Specifications To Be Set By Design Engineer ²</td>
<td>CBOD5 and TSS or Ponding Depth ¹ Frequency varies ²</td>
<td>Specifications To Be Set By Design Engineer ²</td>
<td>Specifications To Be Set By Design Engineer ²</td>
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Though the Operating Permits are Biennial, the inspection frequency is required on an Annual basis.