

DATE: April 16, 2020
TO: Industrial Users Permitted by Gainesville Regional Utilities
FROM: Natalia Larsen, GRU Industrial Pretreatment Program (IPP) Coordinator
SUBJECT: IPP Guidance during Current COVID-19 Pandemic

Dear GRU Customer,

We hope that this correspondence finds you well. We wanted to reach out to you to provide some information on Gainesville Regional Utilities' (GRU) Industrial Pretreatment Program (IPP) and offer our assistance during this challenging time. As many of our local businesses have reduced or paused operations due to the stay at home order issued by the State of Florida and Alachua County, GRU's wastewater volumes have decreased and therefore can be more susceptible to industrial discharges. While this situation is temporary, GRU needs to ensure that wastewater is properly treated and we need to maintain proactive communication with all industrial users to understand any changes to your operations and discharges.

All industrial users are responsible for all discharges leaving the site, and although potentially challenging during the COVID-19 circumstances, you must continue to follow your industrial wastewater discharge permit. If a change in operations and/or discharge occur at your facility, you must submit the following:

- Provide notification.
 - Submit an email to LarsenNG@gru.com detailing the following (if applicable).
 - Indicate if there will be a pause in operations
 - Indicate if there will be a change in discharges (or no discharges); and/or
 - Indicate if there will be any staff reporting to the site.
- If your site must close temporarily
 - Submit an email detailing dates and how the closure will occur
 - Submit a decommissioning plan to handle all wastewater and process tanks/containment areas (if those are part of the system/operation)
- Continue to submit Monitoring Reports.
 - If your site is closed, you may indicate no discharge/site closed due to COVID-19 in a letter signed by the authorized representative (you will not be expected to collect samples after the site has closed);
 - If your site is open but has decreased/limited manufacturing, submit an explanation with the monitoring report; and/or
 - If there are difficulties obtaining samples or getting samples to/from the laboratory, submit an explanation with the monitoring report.
 - **REMEMBER – submit only by email and keep the original signed report for submittal at a later date**
- Evaluation of a pause in operation.
 - Will process tanks/containment areas need to be drained due to spoilage?

- Submit a discharge request to the IPP coordinator.
 - How will tanks of chemical baths be managed? Can they stay where they are until sites are opened again?
 - They cannot be discharged to the sanitary sewer.
 - Review any spill or slug discharge plans (if applicable).
- Evaluation of start-up procedures and corresponding potential discharges.

Please let us know if there is anything we can do to assist you during this unprecedented time.

Thank you and be safe!

A handwritten signature in black ink that reads "N. Larsen". The signature is written in a cursive, flowing style.

Natalia G. Larsen
Environmental Programs Coordinator
Gainesville Regional Utilities