

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTINEZ CENTER 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32399-2400 RICK SCOTT GOVERNOR

CARLOS LOPEZ-CANTERA LT. GOVERNOR

JONATHAN P. STEVERSON SECRETARY

SENT VIA ELECTRONIC MAIL

In the Matter of an Application for Permit by:

26 March 2015

Dave Cash, Water/Wastewater Division Manager Sarasota County Public Utilities 1001 Sarasota Center Boulevard Sarasota, Florida 34242 <u>dcash@scgov.net</u> Sarasota County UIC 331586-001-UO/1X WACS ID 101256 Class I Injection Well System, IW-1A Operation Permit

NOTICE OF DRAFT PERMIT

The Department of Environmental Protection hereby gives notice that a Draft Permit has been developed for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Sarasota County Public Utilities, Dave Cash, Water/Wastewater Division Manager, 1001 Sarasota Center Boulevard, Sarasota, Florida 34242 applied on December 30, 2014 to the Department of Environmental Protection for a permit to operate a Class I injection well system.

The Department has permitting jurisdiction under chapter 403 of the Florida Statutes and the rules adopted thereunder. The project is not exempt from permitting procedures. The Department has determined that an operation permit is required for the proposed work.

Pursuant to section 403.815 of the Florida Statutes, and Rule 62-528.315 (6)(b) of the Florida Administrative Code, you (the applicant) are required to publish at your own expense the enclosed Notice of Draft Permit. The Notice must be published one time only within 30 days in a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031 of the Florida Statutes, in the county where the activity is to take place. The applicant shall provide proof of publication to the Tallahassee Office of the Department within seven (7) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit. Any interested person may submit written comments on the draft permit within 30 days of the public notice. Written comments may be submitted to the Department of Environmental Protection, Aquifer Protection Program, 2600 Blair Stone Road, MS 3530, Tallahassee, Florida 32399-2400. All comments received within the 30-day period and during the public meeting will be considered by the Department in formulating a final decision concerning this project. If a public meeting is arranged it must be held in the area of the well no less than 30 days after publication of this Notice for the purpose of receiving verbal and written comment concerning this project. If a public meeting is not arranged prior to publication, the Notice must provide an opportunity for a public meeting. If a public meeting is later scheduled, there will be another 30-day notice period for that meeting. Please contact Douglas Thornton, Engineering Specialist at 850.245.8666, for additional information.

Executed in Leon County, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Joseph Haberfeld

Joseph Haberfeld, P.G. Aquifer Protection Program Administrator

PERMITTEE: Dave Cash, Integrated Water/Wastewater Manager**Permit Number:** 331586-001-UO/1XSarasota County Public UtilitiesWACS ID:Venice Gardens WTP101256

CERTIFICATE OF SERVICE

The undersigned designated clerk hereby certifies that this NOTICE OF DRAFT PERMIT and all copies were mailed before the close of business on Thursday, March 26, 2015, to the listed persons.

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to Section.120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged

Maryter

Clerk

March 26, 2015

Date

Copies Furnished To:

Joseph Haberfeld, FDEP/TLH Douglas Thornton, FDEP/TLH Cathleen McCarty, FDEP/TLH Will L. Evans, FDEP/TLH David Rhodes, FDEP/SD Cliff Harrison, SGOV/Sarasota Glenn Richter, SGOV/Sarasota John Eash, Atkins Inc. Tom Farkas, Atkins Inc. Kevin Dorsey, Atkins Inc. Leandro Garcia, FDEP/TLH Mary Genung, FDEP/TLH Nancy Marsh, USEPA/ATL joe.haberfeld@dep.state.fl.us douglas.thornton@dep.state.fl.us cathleen.mccarty@dep.state.fl.us will.l.evans@dep.state.fl.us david.rhodes@dep.state.fl.us hharriso@scgov.net grichter@scgov.net john.eash@atkinsglobal.com tom.farkas@atkinsglobal.com kevin.dorsey@atkinsglobal.com leandro.garcia@dep.state.fl.us mary.genung@dep.state.fl.us marsh.nancy@epa.gov

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF DRAFT PERMIT

The Department of Environmental Protection hereby provides Notice that it has prepared a Draft Permit for the proposed project as detailed in application File No. 331586-001-UO/1X (WACS #101256), subject to the conditions specified in the draft permit and summarized below. The applicant, Sarasota County Public Utilities, Dave Cash, Water/Wastewater Division Manager, 1001 Sarasota Center Boulevard, Sarasota, Florida 34242 applied on December 30, 2014 for a permit to operate a Class I injection well system. The project is located at 1350 Jacaranda Boulevard, Venice Gardens, Florida.

The facility will operate - A non-hazardous Class I Injection Well System, consisting of one (1) Class I injection well (IW-1A) with, twenty-four inch (24") diameter steel casing, to 1300 feet below land surface (bls) and sixteen inch, (16.6" inside diameter) FRP injection tubing to 1300 feet bls, with a fluid-filled annulus, and a total depth of 1850 feet bls. Injection will be into the Avon Park Formation for the primary means of disposal of reverse osmosis concentrate from the Venice Gardens and T. Mabry Carlton Water Treatment Plants and back-up disposal of secondary treated municipal effluent from the Venice Gardens Water Reclamation Facility to the existing (IW-1A) injection well. The shallow zone monitoring well (UZMW-1) will monitor from 610 to 650 feet bls and deep zone monitoring well (LZMW-1) will monitor from 1130 to 1180 feet bls.

The Department has permitting jurisdiction under Chapter 403 of the Florida Statutes and the rules adopted thereunder. The project is not exempt from permitting procedures. The Department has determined that an operation permit is required for the proposed work.

Any interested person may submit written comments on the draft permit and may request a public meeting within 30 days after publication of this public notice. A request for a public meeting shall be submitted in writing and shall state the nature of the issues proposed to be raised in the meeting. If a public meeting is later scheduled, there will be another 30-day notice period for that meeting. Written comments or a public meeting request shall be submitted to the Department of Environmental Protection, Aquifer Protection Program, 2600 Blair Stone Road, MS 3530, Tallahassee, Florida 32399-2400, which is the office processing this permit application. All comments received within the 30-day period will be considered in formulation of the Department's final decision regarding permit issuance.

The application, draft permit, and fact sheet are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, South District Office, 2295 Victoria Avenue, Suite 364, P.O. Box 2549, Fort Myers, Florida 33902-2549, and at the Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Any additional information concerning this project may be obtained by contacting Douglas Thornton, Engineering Specialist, at 850.245.8666.

ANDOWENTAL PROTECTION

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION CARLOS LOPEZ-CANTERA

BOB MARTINEZ CENTER 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32399-2400 RICK SCOTT **GOVERNOR**

LT. GOVERNOR

JONATHAN P. STEVERSON SECRETARY

Underground Injection Control Class I Injection Well System Operation Permit

Permittee:

Dave Cash, Water/Wastewater Division Manager Permit Number: Sarasota County Public Utilities 1001 Sarasota Center Boulevard Sarasota, Florida 34242 dcash@scgov.net

Facility Venice Gardens WTP 1350 Jacaranda Boulevard Venice Gardens, Florida

Date of Expiration: Permit Processor:

Location

County: 27° 03' 48" N Latitude: 82° 23' 03" W Longitude: Section/Township/Range:

Sarasota County UIC Sec 26/ T39S / R19E

331586-001-UO/1X

Douglas Thornton

101256

Draft

Draft

Project: Class I Injection Well System IW-1A.

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and the rules adopted thereunder. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows.

TO OPERATE: A non-hazardous Class I Injection Well System, consisting of one (1) Class I injection well (IW-1A) with, nominal twenty-four inch (24") diameter steel casing, to 1300 feet below land surface (bls) and nominal sixteen inch, (16.6" inside diameter) FRP injection tubing to 1300 feet bls, with a fluid-filled annulus, and a total depth of 1850 feet bls. Injection will be into the Avon Park Formation for the primary means of disposal of reverse osmosis (RO) concentrate from the Venice Gardens and T. Mabry Carlton Water Treatment Plants and back-up disposal of secondary treated municipal effluent from the Venice Gardens Water Reclamation Facility to the existing (IW-1A) injection well for a maximum disposal of 9.8 million gallons per day (MGD). The maximum injection rate shall not exceed 6805 gallons per minute. The shallow zone monitoring well (UZMW-1) will monitor from 610 to 650 feet bls and deep zone monitoring well (LZMW-1) will monitor from 1130 to 1180 feet bls.

Permit/Certification WACS ID: Date of Issuance:

IN ACCORDANCE WITH: The Application to Operate DEP Form No. 62-528.900(1) received, December 30, 2014, response to the Department's February 9, 2014 request for additional information, and supporting information submitted to this agency.

LOCATION: Venice Gardens WTF, 1350 Jacaranda Boulevard, Venice Gardens, Florida, in the county of Sarasota.

The injection and monitoring wells at this facility are designated as follows:

Injection Wells:

Well Name	WACS Effluent Testsite ID	Total Well Depth *	Casing Diameter (inches)	Casing or Tubing Type	Casing Depth or Interval*
			54	Steel	33
IW-1A			42	Steel	278
	101256	1850	34	Steel	980
	101230	1650	24	Steel	1300
			16.6 ID		1300
			Open hole		From 1300 to 1850

*Feet Below Land Surface

Monitoring Wells System

Well Name	WACS Monitoring Well Testsite ID	Monitoring Zone	Casing Diameter (OD)	Casing Type	Casing Depth*	Monitoring Depth*
			16	Steel		280
UZMW-1			6	FRP		610
	4203	Upper Zone				From 610 to 650
LZMW-1			16	Steel		280
			6	FRP		1130
	4364	Lower Zone				From 1130 to 1180

*Feet Below Land Surface

SUBJECT TO: Specific Conditions I-VI and General Conditions 1-24.

Specific Conditions

I. OPERATING REQUIREMENTS

A. General

- 1. Only non-hazardous injectate as described in this permit and purge water from the on-site monitoring wells (associated with the injection well system) may be discharged into the injection wells. [62-528.400(1)]
- 2. The injection pressure at the wellhead shall be monitored and controlled at all times to ensure the maximum pressure at the wellhead does not exceed two-thirds of the most recent tested pressure on the final casing, final cemented tubing, or casing/tubing annular space, as applicable. The following table outlines the wellhead pressures applicable at the time of permit issuance:

Well	Maximum Permitted Wellhead Pressure (psi)	Most Recent tested wellhead pressure at the time of issuance of this permit (psi)
IW-1A	106	160

At such time as the next pressure test is performed and a report for that test is submitted to and accepted by the Department, the maximum wellhead pressure allowable will become two-thirds of the tested pressure from the successive test. [62-528.300(6)(e)]

3. The flow to the injection wells at each wellhead shall be monitored and controlled at all times to ensure the maximum fluid velocity down the well during operation does not exceed the respective flow rate indicated below, and shall not exceed 10 feet per second except during planned testing, maintenance, or emergency conditions in which case the flow rate shall not exceed 12 feet per second [62-528.415(1)(f)]:

Well	Peak Flow Rate			
wen	GPM	MGD		
IW-1A	6805	9.8		

- 4. No underground injection is allowed that causes or allows movement of fluid into an underground source of drinking water if such fluid movement may cause a violation of any Primary Drinking Water Standard or may otherwise affect the health of persons. [62-528.440(2)(c)]
- 5. All equipment of this facility shall be operated and maintained so as to function consistently as designed in removing pollutants. The wastewater stream shall remain non-hazardous at all times. [62-528.307(3)(b) and 62-528.400(1)]
- 6. In the event a well must be plugged or abandoned, the permittee shall obtain a permit from the Department as required by Chapter 62-528, Florida Administrative Code

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Sarasota County Public Utilities**Permit Number:** 331586-001-UO/1X
WACS ID: 101256Venice Gardens WTPVenice Cardens WTP

(F.A.C.). When no longer used for their intended purpose, these wells shall be properly plugged and abandoned. Within 180 days of well abandonment, the permittee shall submit to the Department the proposed plugging method, pursuant to Rule 62-528.460, F.A.C. *[62-528.460(1) and 62-528.435(6)]*

- In accordance with rules 62-4.090 and 62-528.455(3)(a), F.A.C., the permittee shall submit an application for permit renewal at least 60 days prior to expiration of this permit. [62-528.307(3)(a)]
- 8. Hurricane Preparedness: Preparations to be made by permittee upon issuance of a "Hurricane Watch" by the National Weather Service include, but are not limited to:
 - a. Secure all onsite salt and other stockpiled additive materials to prevent surface and/or ground water contamination.
 - b. Properly secure equipment to prevent damage to well(s) and onsite treatment process equipment.

[62-528.307(1)(f)]

B. Mechanical Integrity and Mechanical Integrity Testing (MIT)

- 1. Mechanical Integrity.
 - a. The permittee shall maintain the mechanical integrity of the well at all times.
 - b. If the Department determines that the injection well lacks mechanical integrity, written notice shall be given to the permittee.
 - c. Within 48 hours of receiving written notice that the well lacks mechanical integrity, unless the Department requires immediate cessation of injection, the permittee shall cease injection into the well unless the Department allows continued injection pursuant to subparagraph d. below.
 - d. The Department shall allow the permittee to continue operation of a well that lacks mechanical integrity if the permittee has made a satisfactory demonstration that fluid movement into or between underground sources of drinking water is not occurring.

 $[62{\text{-}}528{\text{.}}307(3)(e)]$

2. The permittee shall demonstrate mechanical integrity at least once every five years during the life of each injection well. In the event operational or other data indicate a possible loss of integrity in an injection well, the mechanical integrity and other testing may be required at less than a five-year interval. For each injection well, the mechanical integrity testing program shall include: TV survey, pressure test, radioactive tracer survey (RTS), and temperature log. Mechanical integrity testing shall be run and completed prior to the following dates:

Five-Year MIT				
Well NameRequired Completion				
IW-1A	3/27/2016			

[62-528.300(6)(b)2, 62-528.300(6)(c), and 62-528.425(1)(d)]

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 - 3. A plan describing the mechanical integrity procedures shall be submitted to the Department's Tallahassee and South District offices for approval at least 90 days prior to the required completion date noted above. [62-528.307(1)(m)4]
 - 4. The Department's South District office must be notified a minimum of seventy-two (72) hours prior to all testing for mechanical integrity on the injection wells. The testing procedure must be approved by the Department before testing begins. All testing must be initiated during daylight hours, Monday through Friday. An evaluation of all test results must be submitted with all test data. [62-528.300(6)(f)]
 - 5. Pursuant to Rule 62-528.430(2)(b)2.a., F.A.C., the final MIT report for the demonstration of mechanical integrity for the injection wells shall be submitted to the Department's Tallahassee office for review and approval within three months of the completion date for mechanical integrity testing. In addition, a copy of the cover letter for the MIT results shall be sent to the U.S. Environmental Protection Agency, Region 4, UIC program, 61 Forsyth St. SW, Atlanta, GA 30303-8909. The final MIT report shall be prepared by a registered/certified Professional Engineer and/or Professional Geologist (as appropriate), and it shall address all tests noted in condition B.2 (including procedures followed, interpretations and results), and shall include a tabular presentation/graphical evaluation of monitoring well data over the previous 5-year period. If the well has failed any of the specified tests, the MIT report shall include a plan for corrective action for all discovered deficiencies. [62-528.440(5)(b)]

C. Surface Equipment

- 1. The integrity of the monitoring zone sampling systems shall be maintained at all times. Sampling lines shall be clearly and unambiguously identified by monitoring zone at the point at which samples are drawn. All reasonable and prudent precautions shall be taken to ensure that samples are properly identified by monitoring zone and that samples obtained are representative of those zones. Sampling lines and equipment shall be kept free of contamination with independent discharges and no interconnections with any other lines. [62-528.307(1)(f) and 62-528.307(3)(b)]
- 2. The surface equipment for the each injection well disposing of domestic (municipal) effluent shall maintain compliance with Chapter 62-600.540(4), F.A.C., for water hammer control, screening, access for logging and testing, and reliability and flexibility in the event of damage to the well and effluent piping. [62-600.540(4), 62-528.307(1)(f), and 62-528.307(3)(b)]
- 3. Injection wells not disposing of domestic (municipal) effluent shall maintain compliance with Chapter 62-528.450(2)(j), F.A.C., for water hammer control, as well as access for logging and testing, and reliability and flexibility in the event of damage to the well and effluent piping. [62-528.450(2)(j), 62-528.307(1)(f), and 62-528.307(3)(b)]

- **PERMITTEE:** Dave Cash, Integrated Water/Wastewater Manager
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 - 4. The surface equipment and piping for the injection and monitoring wells shall be kept free of corrosion at all times. [62-528.307(1)(f) and 62-528.307(3)(b)]
 - 5. Spillage onto the injection well pad(s) during construction activities, and any waters spilled during mechanical integrity testing, other maintenance, testing or repairs to the system(s) shall be contained on the pad(s) and directed to a sump which in turn discharges to the pumping station, wet well, or via other approved means to the injection well system(s). [62-528.307(1)(f) and 62-528.307(3)(b)]
 - 6. The injection well pads shall be maintained and retained in service for the life of the injection wells. The injection well pads are not, unless specific approval is obtained from the Department, to be used for storage of any material or equipment at any time. [62-528.307(1)(f) and 62-528.307(3)(b)]
 - 7. The surficial aquifer monitoring wells adjacent to the injection and monitoring wells shall be secured, maintained, and retained in service for subsequent sampling that may be needed (i.e., should there be an accidental discharge to the surficial aquifer); alternatively, the facility may submit a request to the Department for cessation of sampling followed by capping, or plugging and abandonment of these wells. [62-528.307(3)(b) and 62-520.600(6)(k)]

II. QUALITY ASSURANCE/QUALITY CONTROL

- 1. The permittee shall ensure that the operation of this injection well system shall be as described in the application and supporting documents. Any proposed modifications to the permit shall be submitted in writing to the Tallahassee office of the Aquifer Protection Program for review and clearance prior to implementation. Changes of negligible impact to the environment and staff time will be reviewed by the program manager, cleared when appropriate and incorporated into this permit. Changes or modifications other than those described above will require submission of a completed application and appropriate processing fee as per Rule 62-4.050, F.A.C. *[62-528.100 and 62-4.050]*
- 2. Proper operation and maintenance include effective performance and appropriate quality assurance procedures; adequate operator staffing and training; and adequate laboratory and process controls. [62-528.307(3)(b)]
- 3. All water quality samples required by this permit shall be collected in accordance with the appropriate Department Standard Operation Procedures (SOP), pursuant to Chapter 62-160, Field Procedures. A certified laboratory shall conduct the analytical work, as provided by Chapter 62-160, F.A.C., Laboratory Certification. Department approved test methods shall be utilized, unless otherwise stated in this permit. All calibration procedures for field testing and laboratory equipment shall follow manufacturer's instrumentation manuals and satisfy the requirements of the Department SOPs. A listing of the SOPs pertaining to field and laboratory activities is available at the FDEP website at: http://www.dep.state.fl.us/water/sas/sop/sops.htm. [62-4.246 and 62-160]

- **PERMITTEE:** Dave Cash, Integrated Water/Wastewater Manager
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 - 4. All indicating, recording and totalizing devices associated with the injection well system shall be maintained in good operating condition and calibrated annually at a minimum. The pressure gauges, flow meter, and chart records shall be calibrated using standard engineering methods. [62-528.307(1)(f) and 62-528.307(3)(b)]
 - 5. All reports submitted to satisfy the requirements of this permit shall be signed by a person authorized under Rule 62-528.340(1), F.A.C., or a duly authorized representative of that person under Rule 62-528.340(2), F.A.C. All reports required by this permit which are submitted to the Department shall contain the following certification as required by Rule 62-528.340(4), F.A.C.:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

[62-528.340(1), (2), and (4)]

6. Analyses shall be conducted on unfiltered samples, unless filtered samples have been approved by the South District as being more representative of ground water conditions. [62-520.310(5)]

III. TESTING AND REPORTING REQUIREMENTS

A. General

- 1. The permittee shall submit monthly to the Department the results of all injection well and monitoring well data required by this permit no later than the last day of the month immediately following the month of record. The report shall include:
 - a. A cover page summarizing the current status of all monthly activities, including, but not limited to, the certification and signature required in condition II.5.
 - b. Operational and water quality data in a tabular format. The following identifying information must be included on each data sheet:
 - i. Facility Name
 - ii. Well Name
 - iii. UIC Permit Number
 - iv. WACS Facility ID
 - v. WACS Testsite ID number (on appropriate data sheet) as provided on the Injection Well and Monitoring Well tables on page 2 of this permit.
 - c. Laboratory pages and supporting documentation

[62-528.307(3)(d)]

- **PERMITTEE:** Dave Cash, Integrated Water/Wastewater Manager**Permit Number:** 331586-001-UO/1XSarasota County Public UtilitiesWACS ID:Venice Gardens WTP101256
 - 2. The report may be sent via electronic mail in AdobeTM (.pdf) format to the following Program e-mail addresses:

South District	SouthDistrict@dep.state.fl.us
Tallahassee - UIC Program	TAL_UIC@dep.state.fl.us

If a paper copy of the report is submitted, it should be sent to Department staff at the following addresses:

	2295 Victoria Avenue, Suite 364
South District	P.O. Box 2549
	Fort Myers, Florida 33902-2549
Tallahassee - UIC Program	2600 Blair Stone Road, MS 3530 Tallahassee, Florida, 32399-2400
[62-528.307(3)(d)]	

PERMITTEE: Dave Cash, Integrated Water/Wastewater Manager**Permit Number:** 331586-001-UO/1XSarasota County Public UtilitiesWACS ID:Venice Gardens WTP101256

B. Monitoring

 The injection system shall be monitored in accordance with Rules 62-528.425(1)(g) and 62-528.430(2), F.A.C. The following injection well performance data and monitor zone data shall be recorded and reported in the Monthly Operating Report (MOR) as indicated below. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. [62-528.307(3)(d) and 528.430(2)]

		RECORDING	FREQUENCY OF ANALYSES		
PARAMETER	UNIT FREQUENCY	IW-1A	UZMW-1	LZMW-1	
		The Queline I	101256	4203	4364
Annular Pressure, max.	psi	continuous	а		
Annular Pressure, min.	psi	continuous	a		
Annular Pressure, avg.	psi	continuous	а		
Injection Pressure, max.	psi	continuous	а		
Injection Pressure, min.	psi	continuous	а		
Injection Pressure, avg.	psi	continuous	а		
Flow Rate, max.	gpm	continuous	а		
Flow Rate, min.	gpm	continuous	а		
Flow Rate, avg.	gpm	continuous	а		
Volume WRF Effluent Injected	mg	daily/monthly			
Volume WTP Concentrate Injected	mg	daily/monthly			
Total Volume Injected	mg	daily/monthly			
Fluid Added to or Removed From Annulus	gal	daily/monthly			
Pressure Added to or Removed From Annulus	psi	daily/monthly			
Water Level/Pressure max.	psi or ft NAVD	continuous		а	а
Water Level/Pressure min.	psi or ft NAVD	continuous		а	а
Water Level/Pressure avg.	psi or ft NAVD	continuous		а	а
Nitrate + Nitrite as N (mg/l)	mg/L*	grab	M WRF		
Ammonia (as N)	mg/L*	grab	M WRF	М	М
Total Kjeldahl Nitrogen	mg/L*	grab	M WRF	М	М
Specific Conductivity ^b	µmhos/cm	grab	M WTP	М	М
Sulfate	mg/L	grab	M WTP	М	М
Temperature (field) ^b	°C	grab	M WTP	М	М
Total Dissolved Solids	mg/L	grab	M WTP	М	М
Chloride	mg/L	grab	M WTP	М	М
pH ^b	std. units	grab	M WTP	М	М
Bicarbonate – HCO3	mg/L	grab	Q ^{WTP}	Q	Q
Calcium	mg/L	grab	QWTP	Q	Q
Iron	mg/L	grab	QWTP	Q	Q
Magnesium	mg/L	grab	Q ^{WTP}	Q	Q
Potassium	mg/L	grab	Q ^{WTP}	Q	Q
Sodium	mg/L	grab	Q ^{WTP}	Q	Q
Gross Alpha	pCi/L	grab	QWTP		Q
Radium ²²⁶	pCi/L	grab	QWTP		Q
Radium ²²⁸	pCi/L	grab	Q ^{WTP}	1 6	Q

^a - Operational data reporting for flows, pressures and water levels: daily max, min and average from continuous reporting; monthly max, min and average (calculated from daily averages).

^b - Field samples

*Sampling only required during those months in which WRF effluent is injected.

WRF – WRF Effluent Water Quality; WTP – WTF Concentrate Water Quality

M - monthly; Q – quarterly;

- 2. A specific injectivity test shall be performed quarterly on the injection well as required by Rule 62-528.430 (2) (b)l.b., F.A.C. Pursuant to Rule 62-528.430(2) (d), F.A.C, the specific injectivity test shall be performed with the pumping rate to the well set at a predetermined level and reported as the specific injectivity index (gallons per minute/specific pressure). The pumping rate to be used shall be based on the expected flow, the design of the pump types, and the type of pump control used. As part of this test, the well shall be shut-in for a period of time necessary to conduct a valid observation of pressure fall-off. The specific injectivity test data shall be submitted along with the monitoring results of the injection and monitoring well data. [62-528.430(2) (b) and (d)]
- 3. Pertaining to the evacuation (purging) of monitoring wells, which is required prior to the collection of samples for the Monthly Operating Reports (MORs), the facility may elect to follow either one of the following two purging protocols:
 - a. The protocol stated below:

A minimum of three well volumes of fluid shall be evacuated from the monitoring systems prior to sampling for the chemical parameters listed above. Sufficient purging shall have occurred when either of the following has occurred:

- 1) pH, specific conductance <u>and</u> temperature when sampled, upon purging the third or subsequent well volume, each vary less than 5% from that sampled upon purging the previous well volume; or
- 2) Upon purging the fifth well volume.
- b. The following protocol taken from DEP-SOP-001/01(Field Procedures):
 - 1) Purge until the water level has stabilized (well recovery rate equals the purge rate), then purge a minimum of one well volume, and then collect the first set of stabilization parameters, namely pH, specific conductance and temperature;
 - 2) Thereafter, collect stabilization parameters \geq every ¹/₄ well volume;
 - 3) Purging shall be complete when either of the following have occurred:
 - a) 3 consecutive readings of the parameters listed below are within the following ranges^[1]:
 - i. $pH \pm 0.2$ Standard Units
 - ii. Specific Conductance \pm 5.0% of reading
 - iii. Temperature $\pm 0.2^{\circ}C$
 - b) Upon purging the fifth well volume.

[62-160.210(1) and 62-528.430(2)]

4. The flow from the monitoring zones during well evacuation and sampling shall not be discharged to surface waters or aquifers containing an underground source of drinking water. Waters purged from monitoring wells in preparation for sampling shall be

^[1] Provided dissolved oxygen in the groundwater of the zone being monitored is $\leq 20\%$ of saturation for the measured temperature and turbidity is ≤ 20 NTUs. This assumption holds true for groundwater in most zones of the Floridan aquifer.

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diverted to the injection well head via the pad drainage system, wet well, or treatment plant. [62-4.030, 62-620.320]

IV. ABNORMAL EVENTS

- 1. In the event the permittee is temporarily unable to comply with any of the conditions of a permit due to breakdown of equipment, power outages or destruction by hazard of fire, wind, or by other cause, the permittee of the facility shall notify the South District office. [62-528.415(4)(a)]
- 2. Notification shall be made in person, by telephone, or by electronic mail (e-mail) within 24 hours of breakdown or malfunction to the South District office. [62-528.307(1)(x)]
- 3. A written report of any noncompliance referenced in Specific Condition (1) above shall be submitted to the South District office and the Tallahassee office within five days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its reoccurrence, emergency procedures in use pending correction of the problem, and the time when the facility will again be operating in accordance with permit conditions. [62-528.415(4)(b)]

V. EMERGENCY DISPOSAL

- 1. All applicable federal, state and local permits must be in place to allow for any alternate discharges due to emergency or planned outage conditions. [62-528.415(4)(c)1]
- 2. Any proposed changes in emergency disposal methods shall be submitted to the South District office and the Tallahassee office for review and approval prior to implementation. [62-528.415(4)(c)]
- 3. The emergency disposal method must be fully operational in the event of planned or emergency outages of the injection well system. [62-528.415(4)(c)2]

VI. FINANCIAL RESPONSIBILITY

- 1. The permittee shall maintain at all times the financial resources necessary to close, plug, and abandon the injection and associated monitoring wells. [62-528.435(9)]
- 2. The permittee shall annually review the cost estimate for plugging and abandonment. Upon the occurrence of the plugging and abandonment cost estimate exceeding, by 10 percent or more on an annual basis, the cost estimate upon which the current financial responsibility is based, the permittee shall submit to the Department certified financial documentation necessary to amend, renew, or otherwise replace the existing financial responsibility pursuant to Rule 62-528.435(9)(b), F.A.C. and the conditions of this permit. Documentation that the annual updates are being conducted

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shall be submitted thirty (30) months after the date of permit issuance. [62-528.435(9)(b)]

3. In the event that the mechanism used to demonstrate financial responsibility should become insufficient or invalid for any reason, the permittee shall notify the Department's Tallahassee office in writing within 14 days of such insufficiency or invalidation. The permittee shall within 90 days of said notification submit to the Department's Tallahassee office for approval new financial documentation certifying either the remedy of current financial insufficiency or resolution of the financial instrument invalidation in order to comply with Rule 62-528.435(9)(b), F.A.C, and the conditions of this permit. [62-528.435(9)(b)]

General Conditions

- 1. The terms, conditions, requirements, limitations and restrictions set forth in this permit are "permit conditions" and are binding and enforceable pursuant to section 403.141, F.S. [62-528.307(1)(a)]
- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action. [62-528.307(1)(b)]
- 3. As provided in subsection 403.087(7), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit. [62-528.307(1)(c)]
- 4. This permit conveys no title to land, water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title. [62-528.307(1)(d)]
- 5. This permit does not relieve the permittee from liability for harm to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties there from; 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. [62-528.307(1)(e)]
- 6. The permittee shall 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, or are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar

systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules. [62-528.307(1)(f)]

- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of this permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

d. Reasonable time will depend on the nature of the concern being investigated. [62-528.307(1)(g)]

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent the recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

[62-528.307(1)(h)]

- 9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules. [62-528.307(1)(i)]
- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. [62-528.307(1)(j)]
- 11. This permit is transferable only upon Department approval in accordance with rules 62-4.120 and 62-528.350, F.A.C. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. [62-528.307(1)(k)]

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 - 12. This permit or a copy thereof shall be kept at the work site of the permitted activity. [62-528.307(1)(l)]
 - 13. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records shall be extended automatically unless the Department determines that the records are no longer required.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) the date, exact place, and time of sampling or measurements;
 - 2) the person responsible for performing the sampling or measurements;
 - 3) the dates analyses were performed;
 - 4) the person responsible for performing the analyses;
 - 5) the analytical techniques or methods used;
 - 6) the results of such analyses.
 - d. The permittee shall furnish to the Department, within the time requested in writing, any information which the Department requests to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
 - e. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

[62-528.307(1)(m)]

- 14. All applications, reports, or information required by the Department shall be certified as being true, accurate, and complete. [62-528.307(1)(n)]
- 15. Reports of compliance or noncompliance with, or any progress reports on, requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each scheduled date. [62-528.307(1)(o)]
- 16. Any permit noncompliance constitutes a violation of the Safe Drinking Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [62-528.307(1)(p)]
- 17. 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. [62-528.307(1)(q)]

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 - 18. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit. [62-528.307(1)(r)]
 - 19. This permit may be modified, revoked and reissued, or terminated for cause, as provided in 40 C.F.R. sections 144.39(a), 144.40(a), and 144.41 (1998). The filing of a request by the permittee for a permit modification, revocation or reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition. [62-528.307(1)(s)]
 - 20. The permittee shall retain all records of all monitoring information concerning the nature and composition of injected fluid until five years after completion of any plugging and abandonment procedures specified under rule 62-528.435, F.A.C. The permittee shall deliver the records to the Department office that issued the permit at the conclusion of the retention period unless the permittee elects to continue retention of the records. [62-528.307(1)(t)]
 - 21. All reports and other submittals required to comply with this permit shall be signed by a person authorized under rules 62-528.340(1) or (2), F.A.C. All reports shall contain the certification required in rule 62-528.340(4), F.A.C. [62-528.307(1)(u)]
 - 22. The permittee shall notify the Department as soon as possible of any planned physical alterations or additions to the permitted facility. In addition, prior approval is required for activities described in rule 62-528.410(1)(h). [62-528.307(1)(v)]
 - 23. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or injection activity which may result in noncompliance with permit requirements. [62-528.307(1)(w)]
 - 24. The permittee shall report any noncompliance which may endanger health or the environment including:
 - a. Any monitoring or other information which indicates that any contaminant may cause an endangerment to an underground source of drinking water; or
 - b. Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.

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 5 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 times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. [62-528.307(1)(x)]

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Issued this _____ day of _____ 2015

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft

Joseph Haberfeld, P.G. Aquifer Protection Program Administrator Division of Water Resource Management

FACT SHEET Sarasota County Venice Gardens WTP Site No. 0331586-001-UO/1X, WACS ID No. 101256 March 23, 2015

1. General Information

A. Statutory Basis for Requiring/Issuing Permit

The Department has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.), and the rules adopted thereunder. The project is not exempt from permitting procedures. The Department has determined that an operation permit is required.

B. Name and Address of Applicant.

Dave Cash Water/Wastewater Division Manager Sarasota County Public Utilities 1001 Sarasota Center Boulevard Sarasota, Florida 34242

Facility Venice Gardens Water Treatment Plant (WTP) 1350 Jacaranda Boulevard Venice Gardens, Florida

C. Description of Applicant's Proposed Operation.

To operate one (1), non-hazardous Class I injection well (IW-1A) with, nominal twentyfour inch (24") diameter steel casing to 1300 feet below land surface (bls) and nominal sixteen inch, (16.6 ID) diameter FRP injection tubing to 1300 feet bls, with a fluid-filled annulus, and a total depth of 1850 feet bls. Injection will be into the Avon Park Formation for the primary means of disposal of reverse osmosis (RO) concentrate from the Venice Gardens and T. Mabry Carlton WTP's and back-up disposal of secondary treated municipal effluent from the Venice Gardens Water Reclamation Facility to the existing (IW-1A) injection well for a maximum disposal of 9.8 million gallons per day (MGD). The maximum injection rate shall not exceed 6805 gallons per minute (gpm). The shallow monitoring well (UZMW-1) will monitor from 610-650 feet bls and the deep monitoring well (LZMW-1) will monitor from 1130 to 1180 feet bls. See Document 1.

D. Permitting History of this Facility

Construction Permit issued December 10, 1984 to construct IW-1. Operation Permit UO58-116725 issued for IW-1, May 10, 1988. Operation Permit UO58-263243 issued for IW-1, March 18, 1996. Operation Permit 136598-003-UO issued for IW-1, August 28, 2001. Operation Permit 136598-004-UO issued for IW-1, March 1, 2007 Construction Permit 136598-005-UC issued for IW-1A, August 13, 2008. Operation Permit 136598-006-UO/1X issued for IW-1, August 29, 2012. Construction Permit 0136598-007-UC/1I issued for IW-1A, September 30, 2013.

- E. Documents Used in Permitting Decision
 - 1. Application to renew construction permit for injection IW-1A and monitor wells with supporting information, June 10, 2013.
 - 2. Well Completion Report, Atkins, received September 1, 2011.
 - 3. Financial responsibility documentation approved February 27, 2008.
 - 4. Venice Gardens RO WTP Class I Test Injection Well Operating Permit Application, Atkins, December 30, 2014.
 - 5. Response to incompleteness items, Atkins, March 10, 2015.
- 2. Reasons Permit was Issued / Derivation of Conditions
 - A. Area of Review (Rule 62-528.300(4), F.A.C.)

Wells located within a 1.2 mile (6336 ft) radius from the injection facility were located on a map and the well information listed. There were no wells identified that were not properly completed or plugged within the 1.2 mile area of review. See Document 4 and Rules 62-528.300(4) and 62-528.455(3)(b)1. and 2. F.A.C.

B. Mechanical Integrity Demonstration (Rule 62-528.300(6), F.A.C.)

Mechanical Integrity testing (MIT) on well IW-1 was successfully conducted during construction of well IW-1A. On February 21, 2011, the 24-inch OD casing was pressure tested with a beginning pressure of 160 psi for 60 minutes. At the end of the test the pressure was 158 psi or a 1.25 percent decrease. On March 28, 2011, the annulas between the18-inch OD

FRP tubing and the 24-inch casing was pressure tested with a beginning pressure of 159 psi for 60 minutes. At the end of the test the pressure decreased to 158.5 psi or a loss of 0.31 percent. Both pressure tests indicates successful testing by not exceeding a 5 % change in pressure after one hour pursuant to F.A.C. Rule 62-528.300(6)(a)2(e). See Document 2, Section 2.6 for details.

On April 14, 2011, a temperature log and radioactive tracer log were run on the completed injection well with no evidence of upward movement of tracer. See Document 2, Section 2.6 for details.

C. Confinement (Rule 62-528.405(3), F.A.C.)

The Underground Source of Drinking Water (USDW), where water quality consists of a total dissolved solids (TDS) value less than 10,000 mg/L, extends to a depth of approximately 800 feet bls at this site. Straddle packer test, core analysis and geophysical logs indicate that confinement exists at the base of the USDW to a depth of approximately 1,300 feet bls. The confining interval is part of the lower Suwannee Limestone (Oligocene) and Ocala Limestone (Eocene). Lithology is mostly limestone with intermittent layers of dolostone. See Documents 2 and 8.

D. Injection Zone Testing, (Rule 62-528.405(30, F.A.C.)

Based on lithology, aquifer packer testing, water quality sampling, geophysical logs and short and long-term injection tests the injection zone is between 1300 feet bls and 1850 feet bls within the Avon Park Formation of Eocene Age. These data indicate that the injection zone is sufficiently permeable and saline for injection. The lithology consist of well-indurated, variable vuggy and fractured dolostones and minor amounts of poorly indurated limestones. Specific injectivity testing and long-term operation indicate the zone is sufficiently permeable and saline for injection. See Documents 2 and 8 for details.

F. Well Construction.

Casing program for IW-1A (all casings are new, unused steel cemented to land surface) and an uncemented FRP tubing. Actual depths of casings are shown below. See Document 2.

54" OD steel casing set to 33 feet bls, thickness is 0.375 inches
42" OD thick) steel casing set to 278 feet bls, thickness is 0.375 inches
34" OD steel casing set to 980 feet bls, thickness is 0.375 inches
24" OD steel casing set to 1,300 feet bls, thickness is 0.50 inches
18.11" OD FRP tubing set to 1,300 feet bls with a packer, thickness is 0.76 inches

Total well depth is 1850 feet bls. The casing / tubing annulus is fluid-filled with its pressure continuously monitored.

G. Monitor Plan, (Rule 62-528.425(1), F.A.C.)

Two monitor wells are located within 150 feet of injection well IW-1A. The Upper Zone Monitor Well (UZMW-1) monitors the interval at 610 to 650 feet bls within the Suwannee Limestone (Oligocene Age). The Lower Zone Monitor Well (LZMW-1) monitors the interval of 1,130-1,180 feet bls within the Ocala Limestone and Avon Park Formation (Eocene Age). The upper zone monitor well monitors the basal portion of the USDW. The lower zone monitor well is for early warning monitoring below the base of the USDW. Packer tests, water quality tests, formation sampling, coring and geophysical logs were used to define the characteristics of the monitoring zones. See Document 1 and Document 2, Sections 2 and 3.

Required monitoring parameters include daily injection volume, flow rate, annular pressure, and injection pressure; monitoring of the wastestream for chemical parameters; and monitoring of the monitor wells for chemical parameters. Pressures are continuously monitored in the monitor wells. Quarterly specific injectivity and pressure fall off testing is also required. Ground water quality monitoring data collected since the start of operational testing in 2013 indicate the system is operating as designed. See Documents 1, 4, and Draft Permit for details.

H. Financial Responsibility (Rules 62-528.435(9) and 62-528.455(3)(b)8., F.A.C.)

Demonstrated by local government guarantee. Financial responsibility approved February 27, 2008. Revised plugging and abandonment costs for 2014 were submitted with the 2014 application. See Documents 3 and 4 for details.

I. Emergency Disposal (Rule 62-528.455(1)(d), F.A.C.)

This well serves as backup to the county's other injection well at this facility (IW-1), Venice Gardens IW-2, and the T. Mabry Carlton, Jr. WTP (Center Road) injection facility. If this injection well is out of service, flows will be directed to the above wells owned by Sarasota County. See Document 2, Appendix O Operation and Maintenance Manual.

3. Agency Action

A draft permit shall be issued as per Rule 62-528.310, F.A.C.

4. Public Rights (Rules 62-528.310, 62-528.315, 62-528.325, F.A.C.)

Any interested person may submit written comments on the draft permit, and may request a public meeting, within 30 days of the public notice. A request for a public meeting shall be in writing and shall state the nature of the issues proposed to be raised at the meeting. If a public meeting is later scheduled, there will be another 30-day notice period for that meeting. Written comments or a public meeting request may be submitted to the Department of Environmental Protection, Aquifer Protection Program, 2600 Blair Stone Road, MS 3530, Tallahassee, Florida 32399-2400. All comments received within the 30-day period and during the public meeting will be considered in formulation of the Department's final decision regarding permit issuance.

After the conclusion of the public comment period and public meeting described above, the Department may revise the conditions of the permit based on such public comment. Then the applicant will publish Notice of the Proposed Agency Action. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing). Accordingly, the Department's final action may be different from the position taken by it in the Notice of Proposed Agency Action. The petition must conform to the requirements specified in the Notice and be filed (received) within 14 days of publication of the Notice in the Department's Office of General Counsel, MS 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will only be at the discretion of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

The application and draft permit are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at Department of Environmental Protection, Aquifer Protection Program, 2600 Blair Stone Road, Mail Station 3530, Tallahassee, Florida, 32399-2400, and Department of Environmental Protection, South District Office, 2295 Victoria Ave., Suite 364, Fort Myers, Florida 33901. Please contact Douglas Thornton at 850.245.8666 for additional information concerning this project.

Agency Contact:

Douglas Thornton, Engineer Specialist III. Florida Department of Environmental Protection Aquifer Protection Program, MS 3530 Tallahassee, Florida 32399-2400 Phone: 850-245-8666