

# TAB 4

## POINT PAPER

### RE-RATE STUDY & WASTE WATER TREATMENT PLANT IMPROVEMENTS APRIL 21, 2008

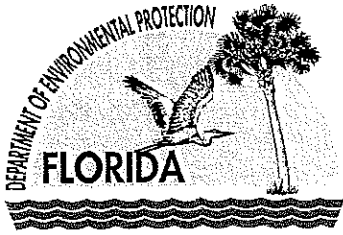
**PROBLEM:** The City of Palmetto has received correspondence from the Florida Department of Environmental Protection (FDEP) regarding the renewal of the permit for the Waste Water Treatment Plant (WWTP). The cost of the improvements is substantial, but must be scheduled for completion in order to renew the permits. A rate study is required to determine the appropriate revenue necessary to fund the improvements.

**BACKGROUND:** The City of Palmetto must renew its WWTP permit every 5 years. We have submitted our application to FDEP for renewal, and received a letter requesting additional information that, in general, is related to revising our groundwater monitoring plan to accommodate a reduction in allowable discharge and to reduce I & I.

In order to accommodate these reductions, the City must make a variety of improvements to the WWTP and to the Water, Sewer, and Stormwater systems.

In order to ensure the City's ability to fund the necessary improvements, the City should conduct a rate study, examining the cost of improvements and current revenue. It is also important to prepare a schedule for the completion of these improvements, so as to distribute the cost over a reasonable time period, while ensuring that the City meets the requirements of the permit renewal.

**Jim McLellan of Jones Edmunds will provide the City Commission with a cost analysis and presentation regarding the needed improvements and permitting requirements.**



# Florida Department of Environmental Protection

Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

March 28, 2008

Mr. Chris Lukowiak  
Public Works Director  
City of Palmetto  
600 17<sup>th</sup> Street West  
Palmetto, FL 34221  
*Via email to: CLukowiak@palmettofl.org*

Re: Request for Additional Information  
City of Palmetto Wastewater Treatment Facility  
PA File No. FL0020401-012-DW1P/NR  
Manatee County

Dear Mr. Lukowiak:

The Department has reviewed the application received on February 29, 2008 for the above-referenced facility. This application has been determined to be incomplete for the following reasons:

1. Please submit a revised groundwater monitoring plan outlining the changes needed as a result of the removal of the 271 acre sprayfield located at the Manatee Fruit Company. Note that with the removal of the sprayfield and the associated 0.820 mgd of reclaimed water that it is permitted for, the annual rating for the public access system will be reduced from 2.65 mgd to 1.83 mgd.
2. Please provide a summary of any exceedances in groundwater monitoring wells MWB-1, MWI-1, MWI-2, MWC-1, MWC-2, MWC-3, MWC-4, and MWC-5 for the current permit cycle.
3. Item 8. on Page 2A-19 indicates 0.82 mgd of reclaimed water going to the Manatee Fruit Company. The cover letter for the renewal package requested to remove this reclaimed water user. Please update Table 8.
4. If the 4,480 acres indicated on Item 8. of Page 2A-19 for the PAR system is to be considered, please provide a reuse map outlining all of the areas, a revised groundwater monitoring plan, and a water balance outlining wet weather storage needed. Tab C 'Addendum No. 1, Reclaimed Water Application Areas and Rates' did not have a document included within it.
5. What percentage of flow is attributed to I&I and what measures are being taken to reduce I&I flow? "Excessive I&I flow" was noted a few times in the CAR.

U-001 is indicated on Page 2A-21 as a new disposal well. U-001 can not be considered at this time. Please apply to the Department's Underground Injection Control program to move forward with a disposal well.

Mr. Chris Lukowiak  
City of Palmetto Wastewater Treatment Facility  
PA File No. FL0020401-012-DW1P/NR  
Page 2 of 2

The request to remove the monitoring of overflow occurrences at Lakes 2 and 3 of the Terra Ceia Golf Course can not be fulfilled. Monitoring of overflow occurrences are a requirement of Chapter 62-610, Florida Administrative Code.

Dichlorobromomethane will be a monitoring parameter in the renewed permit. The limit will be 22 µg/L on an annual average.

The Department does not anticipate the reissuance of mixing zones for toxicity, copper, nickel, or oil and grease.

The City of Palmetto WWTF's immediate receiving waterbody, Terra Ceia Bay, WBID # 1578B is contiguous with Tampa Bay. Therefore, this waterbody and this discharge may be included in the development of the nutrient TMDL and Reasonable Assurance document for Tampa Bay. A Waste Load Allocation (WLA) may be developed based on the most recent loading information available. This WLA may be the basis for the final total nitrogen limit.

When an application is incomplete, all processing is suspended. Pursuant to Section 120.60, Florida Statutes, the Department may deny an application if the applicant, after receiving timely notice, fails to correct errors, omissions, or supply additional information within a reasonable period of time. The information necessary to complete this application should be submitted within 45 days from the date of this letter to re-initiate the processing of the application and avoid denial of issuance of the permit.

This staff assessment is preliminary and designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the department and may be subject to revision pursuant to additional information and further review.

Should you have any questions or comments, please contact the undersigned at [Stephanie.kuhns@dep.state.fl.us](mailto:Stephanie.kuhns@dep.state.fl.us) or 813-632-7600 extension 408.

Sincerely,  
Stephanie Kuhns  
Permitting Engineer  
Domestic Wastewater Section

cc: Tim Harley, P.E., Jones Edmunds (e-mail)  
Ray D'Aiuto, Veolia (e-mail)  
Joe Squitieri, FDEP (e-mail)