



Everglades Coalition

February 20, 2019

Benjamin M. Melnick, Deputy Director,
Division of Water Resource Management
Marc Harris, P.E., Environmental Administrator
Florida Department of Environmental Protection
2600 Blair Stone Road,
Tallahassee, Florida, 32399-2400

Sent Via Email

Re: NPDES Permit No. FL0001562, PA File No. FL0001562-012-IW1N

Dear Mr. Melnick and Mr. Harris,

On behalf of the Everglades Coalition's 63 organization, we wish to express our concern with the Florida Department of Environmental Protection's (DEP) proposed draft National Pollutant Discharge Elimination System (NPDES) permit renewal (DEP File No. FL0001562-012-IW1N) for Florida Power & Light's (FPL) Turkey Point power plant's wastewater treatment and effluent disposal facilities for Units 3, 4, and 5.

The provisions of the permit renewal will play an important role in determining future impacts of the Turkey Point plant cooling canal system (CCS) on the surrounding region, including adjacent Everglades Restoration projects and on the lower east coast regional water supply.

FPL's Turkey Point facility's CCS has been leaking hypersaline water and contaminants into groundwater for decades. And since 2014 it has been shown to have reached surface waters of a National Park and Marine Sanctuary, as well. The CCS is a 5,900-acre network of unlined cooling canals that has had and will continue to have adverse impacts on water quality in Biscayne Bay and adjacent wetlands and the Biscayne Aquifer to the west – which is the drinking water resource for Miami-Dade County and the Keys.

This draft NPDES permit renewal varies considerably from the original NPDES permit in that the permit renewal seems to allow discharges into surrounding groundwater and explicitly provides that groundwater discharges that migrate to surface water via the porous limestone, shall not be a violation of the permit or surface water quality standards. The following are some questions we have for the department to clarify our concerns:

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1000 Friends of Florida
Arthur R. Marshall Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon of the Western Everglades
Audubon Society of the Everglades
Backcountry Fly Fishers of Naples
Bullsugar Alliance
Calusa Waterkeeper
Cape Coral Friends of Wildlife
Center for Biological Diversity
Conservancy of Southwest Florida
Defenders of Wildlife
"Ding" Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
Florida Conservation Voters Education Fund
Florida Defenders of the Environment
Florida Keys Environmental Fund
Florida Native Plant Society
Florida Oceanographic Society
Friends of the Arthur R. Marshall
Loxahatchee National Wildlife Refuge
Friends of the Everglades
Hendry-Glades Audubon Society
International Dark-Sky Association,
FL Chapter
Izaak Walton League of America
Izaak Walton League Florida Division
Izaak Walton League Florida Keys Chapter
Izaak Walton League Mangrove Chapter
Lake Worth Waterkeeper
Last Stand
League of Women Voters of Florida
Martin County Conservation Alliance
Miami Pine Rocklands Coalition
Miami Waterkeeper
National Audubon Society
National Parks Conservation Association
National Wildlife Refuge Association
Natural Resources Defense Council
North Carolina Outward Bound School
Ocean Research & Conservation Association
Reef Relief
Sanibel-Captiva Conservation Foundation
Sierra Club
Sierra Club Florida Chapter
Sierra Club Broward Group
Sierra Club Calusa Group
Sierra Club Central Florida Group
Sierra Club Loxahatchee Group
Sierra Club Miami Group
Snook and Gamefish Foundation
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
The Urban Environment League of
Greater Miami
Theodore Roosevelt Conservation
Partnership
Tropical Audubon Society

- Has the department considered how the continued use of the CCS under the proposed permit renewal will impact the Biscayne Bay Costal Wetlands Projects (Phase I and II) and the C-111 spreader canal projects?
- Is it the department's intent to allow industrial wastewater from the CCS to be discharged through the porous limestone underlying the CCS into the surface waters of Biscayne Bay, a protected Outstanding Florida Water?
- Has the department provided any effluent limitations on these discharges if they are permitted or any requirements to line or otherwise confine the CCS?
- Has the department considered continued function of this facility given the CCS is at sea-level and has already been breached during category 1 hurricanes like Irma, allowing surface to surface water contact?
- Is it department's intent to change the protective boundary delineating the G-II and G-III aquifer in the attached 1983 map?
- How were the surface water monitoring locations selected? The locations identified are not clear compliance boundaries of protected areas that could properly identify the appropriate water quality standards that apply.
- Has the agency been made aware of the degradation of the L-31 E canal system and its subsequent impacts to the surface waters in the wetlands to the west? Our concern is that these wetlands have been protected for conservation and CERP projects. What water quality standards will apply to protect the surface waters of the US to the east of the plant and the L-31E to the West?
- Is the department aware that the weir separating the L-31 E canal water from waters of the US is opened during high rain events and those waters comingle with protected waters of the US, as was the case leading up to Hurricane Irma?
- Will antidegradation standards be required to protect Biscayne Bay from the treated wastewater that FPL's canal "freshening" will likely use to comply with DEP's Consent Order? What are those standards?

We ask that DEP provide clarifying answers and reasonable assurances to our concerns in an open and transparent manner and revise the draft permit to protect the resources of the greater Everglades ecosystem.

Sincerely,



Mark Perry
Co-Chair



Marisa Carrozzo
Co-Chair

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