

September 20, 2013

Mr. Stephen Cioccia, Basin Coordinator  
Florida Department of Environmental Protection  
Watershed Planning and Coordination Section

Sent via email to: Stephen.Cioccia@dep.state.fl.us

Reference: **Draft Basin Management Action Plan for the  
Upper Wakulla River and Wakulla Springs Basins**

Dear Mr. Cioccia:

We have reviewed the draft Basin Management Action Plan (BMAP) referenced above and are sending the following comments for your consideration.

It is Talquin Electric Cooperative's (Talquin) opinion that setting a requirement of 3.0 parts per million (ppm) total nitrogen (TN) as a maximum level for wastewater effluent is not an equitable allocation or an effective management strategy. Using a limit of 3.0 ppm TN effectively sets an allocation of greater than 75% on wastewater treatment plants even though the Upper Wakulla River Total Maximum Daily Load (TMDL) only requires a reduction of 56.2% nitrate as nitrogen (NO<sub>3</sub>). The greater than 75% reduction is calculated from the secondary wastewater treatment standard of 12ppm of NO<sub>3</sub> for groundwater discharge, and NO<sub>3</sub> is just one species in the TN calculation. In addition, the TDML is specifically written for a reduction in NO<sub>3</sub> not TN.

This requirement does not equitably allocate the pollutant reductions in the basin, according to Paragraph 403.067(7)(a)2 Florida Statutes (F.S.), as no other stakeholder is required to submit management strategies that go above and beyond the TMDL or achieve reductions in nitrogen species that were not part of the TMDL, e.g., TN rather than NO<sub>3</sub>.

The requirement will restrict alternative management strategies that could provide cost effective nutrient reductions and will force the costly infrastructure associated with a TN limit of 3.0ppm, commonly associated with advance wastewater treatment (AWT) standards. Talquin has actively sought management strategies that will significantly reduce NO<sub>3</sub> load in energy efficient, green and natural design technologies, and cost effective manners, such as constructed treatment wetlands (CTW). Strategies such as CTWs and other such technologies will be eliminated by the arbitrary allocation of 3.0 ppm TN.

The BMAP acknowledges that the largest source of NO<sub>3</sub> loading is onsite sewage treatment and disposal systems (OSTDS) yet does not propose such a stringent or restrictive standard for OSTDS. While Talquin understands the need for the OSTDS initiative put forth in the BMAP, many of the potential management strategies for the OSTDS will become cost prohibitive and not achievable with a 3.0 ppm TN limit. The TN limit will greatly reduce the applicability and effectiveness of the OSTDS initiative. The limit will hinder the innovation of new treatment technologies and the development of strategies to effectively deal with OSTDS.

None of the BMAP technical meetings have discussed the requirement of 3.0 ppm TN on wastewater treatment plants. Instead the first mention was in the draft BMAP, which was released for public

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comment on September 13<sup>th</sup>. The inclusion of a standard that was not discussed in the technical meetings does not encouraged cooperation or consensus from stakeholders in the BMAP process.

Talquin requests that the Department revise its accelerated schedule to address these issues to and allow stakeholder the proper time to review the draft BMAP. Talquin would welcome a meeting with the department to discuss these and other issues.

Sincerely,  
TALQUIN ELECTRIC COOPERATIVE, INC.

A handwritten signature in black ink, appearing to read "John Hallas", written in a cursive style.

John Hallas

JH