



DATE: January 31, 2024

TO: Moira Homann, Program Administrator
Florida Department of Environmental Protection
Division of Environmental Assessment & Restoration
Water Quality Restoration Program

FROM: Charles S. Parker, P.E., Assistant Division Manager
Orange County Utilities
Engineering Division

SUBJECT: DEP Request for Information Pursuant to Final Order, OGC Case No. 23-0112 to 0135 Wastewater Treatment Plans and Onsite Sewage Treatment and Disposal System Remediation Plans

Dear Ms. Homann:

Orange County Utilities (OCU) is pleased to submit the following response to the Request for Information regarding OGC Case No. 23-0112 to 0135, for Order Elements 1 through 11. Order Elements 12-14 will be submitted under a separate submittal by the Orange County Environmental Protection Division.

The jurisdictional boundary of Orange County intersects the following nutrient Basin Management Action Plan (BMAP) areas:

- Lake Jesup Basin;
- Lake Okeechobee;
- Upper Ocklawaha River Basin;
- Wekiva River, Rock Springs Run, and Little Wekiva Canal; and
- Wekiwa Spring and Rock Springs.

Surface waters in these BMAPs are impaired primarily by excess nutrients chemically composed of nitrogen and/or phosphorus.

The Clean Waterways Act (Chapter 2020-150, Laws of Florida) includes water quality protection provision mandates to local governments that are intended to reduce the adverse impacts of nutrient pollution to surface waters. One of the new provisions in the Clean Waterways Act, subparagraph 403.067(7)(a)9., Florida Statutes (FS), requires Orange County to develop a wastewater treatment plan and/or an onsite sewage treatment and disposal system (OSTDS) remediation plan, if the Florida Department of Environmental Protection (DEP), "... identifies domestic wastewater treatment facilities or onsite sewage treatment and disposal systems as contributors of at least 20 percent of point source or nonpoint source nutrient pollution or if the department determines remediation is necessary to achieve the applicable TMDL." Please note that DEP has determined that wastewater treatment facilities and OSTDS within the BMAP areas stated above meet the 20% contribution threshold. Therefore, a remediation plan for these sources is necessary to achieve the nutrient threshold criteria within the BMAP areas above.

The Final Order (Order) pursuant to Sec. 120.52, F.S., which specified that local governments must prepare a remediation plan (Plan), was executed on June 12, 2023. The elements of OSTDS Remediation Plans are included on Page 3 of the Order. Elements 1 through 11 of the Order are

presented in ***bold italics*** and a summary of our responses is below. Please note that for purposes of the draft Plan submittal, the responses below pertain to OSTDSs located in the Orange County Wastewater Service Area.

Order Elements 1 through 6: Wastewater Treatment Plans

In cooperation with the Department, Water Management Districts, and public and private domestic wastewater facilities, each local government within the above referenced BMAPs that either contains a domestic wastewater facility within its jurisdictional boundaries, or has a demonstrated need to establish a domestic wastewater treatment facility within its jurisdiction to improve water quality in order to achieve the water quality objectives of the BMAP, must develop a wastewater treatment plan containing the following information for each domestic wastewater facility in the local government's jurisdiction

The wastewater treatment plan for the affected Orange County Utilities Water Reclamation Facilities is included in *Folder 01 – 06 Wastewater Treatment Plans*

Order Element 7. An inventory of the OSTDS (including locational information, such as GIS shape files, if available, or an excel spreadsheet with address and/or latitude and longitude) within the location government's jurisdiction or service area based on the best information available.

A GIS analysis conducted by Orange County determined that there are 59,650 Onsite Sewage Disposal and Treatment Systems (OSTDS) located within the Orange County Wastewater Service Area. The associated GIS shape files are included in *Folder 07 – Inventory of OSTDS in Orange County WW Service Area*.

Order Element 8. An estimate of future growth in new OSTDS over the next 20 years in the local government's jurisdiction or service area (including locations information such as GIS shape files, if available or an excel spreadsheet with addresses and/or latitude or longitude).

Based on an average of new septic systems permitted with the Florida Department of Health from 2018 to 2022, Orange County estimates an average of 540 new septic tanks installed within Orange County each year. Of the 540, we anticipate the installation of approximately 210 new conventional OSTDS's in Orange County located outside the BMAPS and PRPs each year. The remainder would be advanced/enhanced septic as those areas lie within BMAP and PRP areas. Orange County is currently reviewing one project for 47 single family homes called the Solace at Corner Lake that proposes wastewater disposal by advanced/enhanced septic tanks. This project is located on the southwest corner of Chuluota Road and Lake Pickett Road. The support document and analysis is included in *Folder 08 – Estimate of 20 Year Future Growth of New OSTDS*.

Order Element 9. An inventory of OSTDS that are expected to be eliminated over the next 20 years through connection to central sewer lines of a domestic wastewater facility or other distributed wastewater system with additional nutrient reduction (including locational information, such as GIS shape files, if available, or an excel spreadsheet with address and/or latitude and longitude)

Orange County completed a Septic Tank Feasibility Study for the Wekiwa and Rock Springs BMAP that estimates the number of OSTDS's that are expected to be eliminated over the next 20 years through connection to central sewer lines of a domestic wastewater facility. Part of the study included a GIS analysis conducted by Orange County determined that there are 4,731 OSTDS's located within the Orange County Wastewater Service Area and the Wekiwa and Rock Springs BMAP that are expected to be eliminated. The associated GIS shape files are included in *Folder 09 – Inventory of OSTDS to Sewer*.



Order Element 10. *Identification of deadlines and interim milestones for the planning, design, and construction of new/extended central sewer lines and replacement of OSTDS by connection to the new/extended lines (including locational information, such as GIS shape files, if available, or an excel spreadsheet with address and/or latitude and longitude)*

Orange County has developed a GANNT chart that includes the deadlines and interim milestones for the planning, design, and construction of new/extended central lines and replacement of OSTDS by connection to the new/extended lines. The GANNT chart is based on the locational information included in Order Element 9 and is included in *Folder 10 – Deadlines and Milestones for OSTDS to Sewer*.

Order Element 11. *The estimated costs associated with the projects in Order Element 10 above.*

The overall estimated costs for the planning, design and construction of new/extended central sewer lines and replacement of OSTDS by connection to the new/extended lines is approximately \$443,000,000. Support calculations are included in *Folder 11 – Estimated Costs for OSTDS to Sewer*.

Thank you for the opportunity to submit this draft Plan. Please feel free to contact me regarding any comments or questions regarding Order Elements 1-11 via e-mail at Charles.Parker2@ocfl.net. For any questions related to elements 12, 13, and 14, please contact Mitchell Katz via email at Mitchell.Katz@ocfl.net.

Sincerely,

Charles S. Parker, P.E.
Assistant Division Manager
Orange County Utilities
Engineering Division