



24 West Church Street  
Jacksonville, Florida 32202-3139

March 29, 2012

DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

APR 20 2012

Florida Department of Environmental Protection  
Siting Coordination Office  
3900 Commonwealth Boulevard  
MS 48  
Tallahassee, Florida 32399-3000

**SITING COORDINATION**

RE: Site Certification; JEA St. Johns River Power Park PA 81-13

Dear Ms. Mulkey:

JEA respectfully requests your review of a proposed project at our St. Johns River Power Park (SJRPP). The purpose of the project is to divert effluent flow (reuse water) from JEA's District II wastewater reclamation facility (WRF) to the SJRPP cooling towers in order to deter manatee loitering at the current District II WRF effluent discharge outfall located in the St. Johns River during the winter season of the year. In addition, the reuse will provide a beneficial use as a make-up water source to the SJRPP cooling towers.

JEA has been working with the U.S. Fish and Wildlife Service (US FWS) and Florida Fish and Wildlife Commission (FL FWC) to mitigate and control the manatee loitering that occurs at the District II WRF outfall over the last five years. JEA has agreed to evaluate and implement this effluent diversion strategy to assist in deterring manatees from loitering at the outfall during the late fall and winter seasons.

This project involves the use of the existing 24" and 16" reuse water main from District II WRF to the intersection of New Berlin and Faye roads (Figure 1), and a new 24" reuse water main from Faye Road to the SJRPP cooling towers (Figure 2). Typically, up to 50 MGD of river water is utilized as make-up to the SJRPP cooling towers. If this project is approved approximately up to 5.0 MGD of the water could be supplied as reuse water from District II WRF, or about 10% of the SJRPP cooling tower typical flow.

JEA has made an effort to review and consider the applicable areas of regulatory requirements which must be met for the Department to properly authorize the project under the Site Certification Act. We appreciate the Department's identification of additional requirements and have otherwise identified the applicable regulatory requirement areas as follows for your review;

### NPDES Permit Impact

Both the SJRPP and District II WRF NPDES permits will require some level of modification. JEA has identified these modifications as;

**SJRPP/NGS NPDES Permit** – Authorization to convey reuse for cooling tower makeup is to be incorporated into the permit as a minor modification after the District II NPDES permit has been revised to include reuse water for cooling tower makeup.

**District II NPDES Permit** – Permit to be revised to authorize the use of reuse water for cooling tower makeup (probable minor revision).

### Submerged Lands and Environmental Resources

A minor wetland impact (less than 1,000 square feet) is anticipated at the intersection of New Berlin and Faye roads. Construction methodology and impact footprint will conform to the requirements of Florida Administrative Code 62-341.453. No state owned lands are proposed for impact.

### Control Measures During Construction

A stormwater pollution prevention plan will be developed in advance of construction for the laying of the new pipe along New Berlin Road to the SJRPP cooling towers. This plan will address erosion control measures necessary to protect wetlands and the SJRPP stormwater management system.

Construction dewatering is also anticipated with the installation of the new reuse main. JEA is the property owner of all land in which new construction activity would take place. Though the extent of dewatering required has not yet been determined JEA property ownership in and surrounding the construction corridor includes over 100 acres and therefore adequate space is available to provide for on-site infiltration. Though not anticipated a temporary detention structure will be constructed to allow for on-site infiltration and prevention of off-site discharge of dewater.

### Other Potential Environmental Impacts

No additional environmental impacts are anticipated from the project. The project corridor does not contain any known archeological sites or areas of potential soil or groundwater contamination. The project construction methodology is not anticipated to require any local governmental noise variance or other environmental regulatory requirement other than a City of Jacksonville mandated tree mitigation requirement. JEA will work directly with the City to address this requirement.

### Public Interest and Importance of the Project

As previously mentioned JEA has worked with the US FWS and the FL FWC to develop a manatee loitering mitigation strategy and JEA has committed to these agencies to further design and implement this project. In addition, the reuse will provide a beneficial use as a make-up water source to the SJRPP cooling towers.

Thank you as always for your review, and assistance to JEA in our efforts to continue providing efficient electric, sewer, and water utility services to the JEA rate payers in the most environmentally sound manner. Please let me know what your additional informational needs are at your earliest opportunity. You may contact me at (904) 665-7719 or via my email address at [searar@jea.com](mailto:searar@jea.com)

Sincerely,



Andrew Sears  
Sr. Environmental Scientist  
JEA Environmental Services

CC: A. Seiler, FDEP  
Jay Worley, JEA  
Ed Cordova, JEA  
Jamila Akaryi, JEA

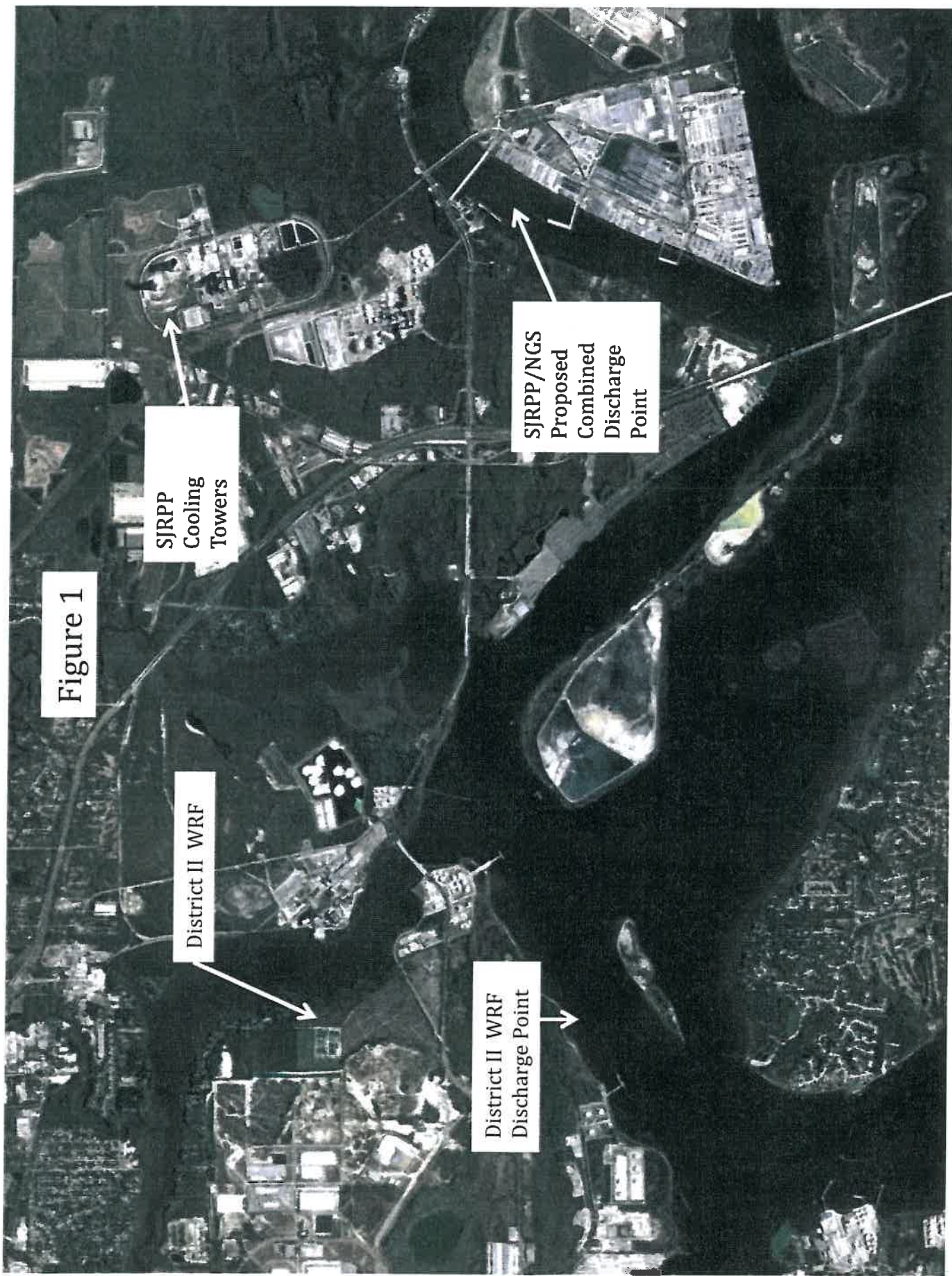
Figure 1

SJRPP  
Cooling  
Towers

SJRPP/NGS  
Proposed  
Combined  
Discharge  
Point

District II WRF

District II WRF  
Discharge Point





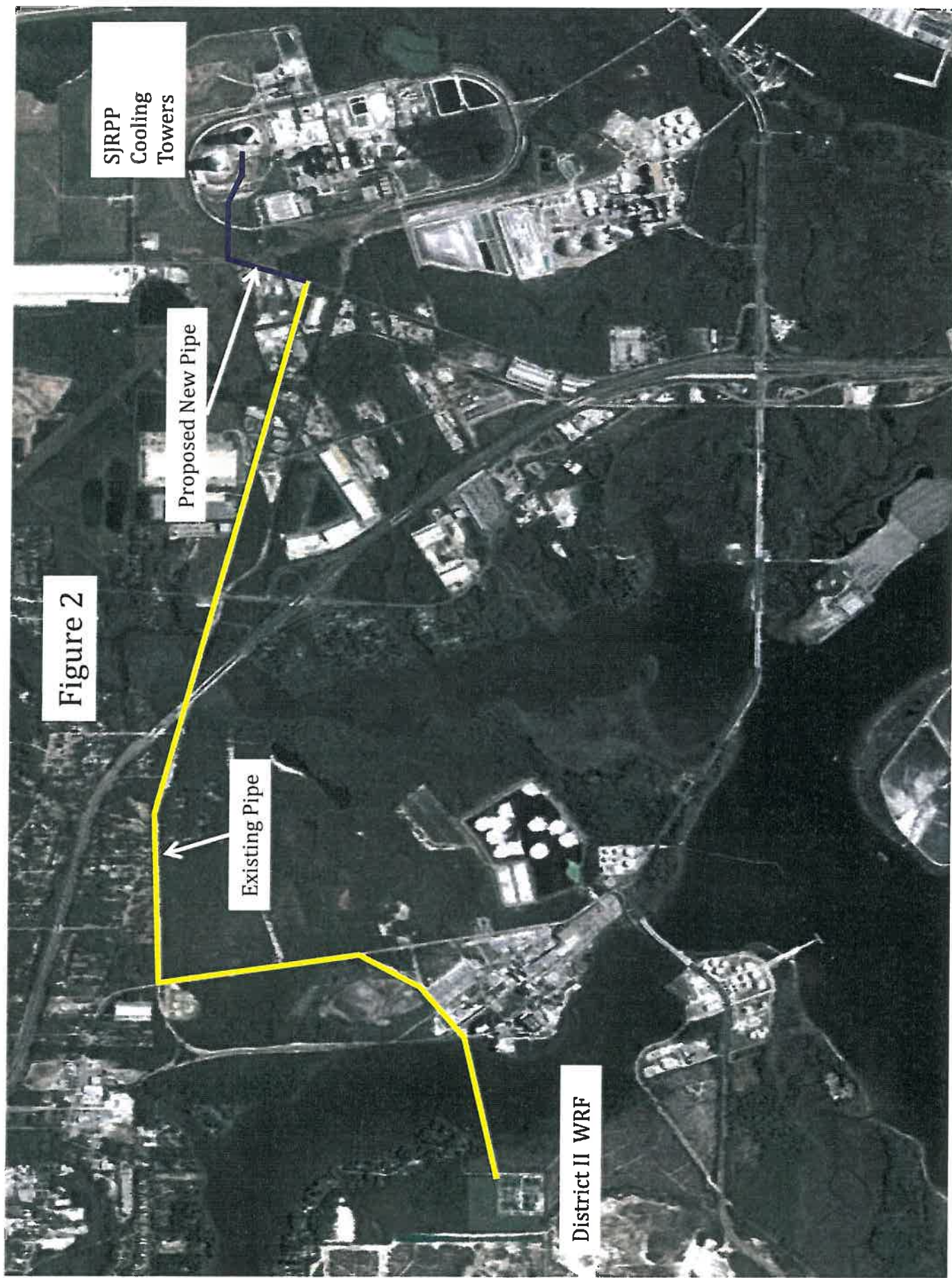


Figure 2



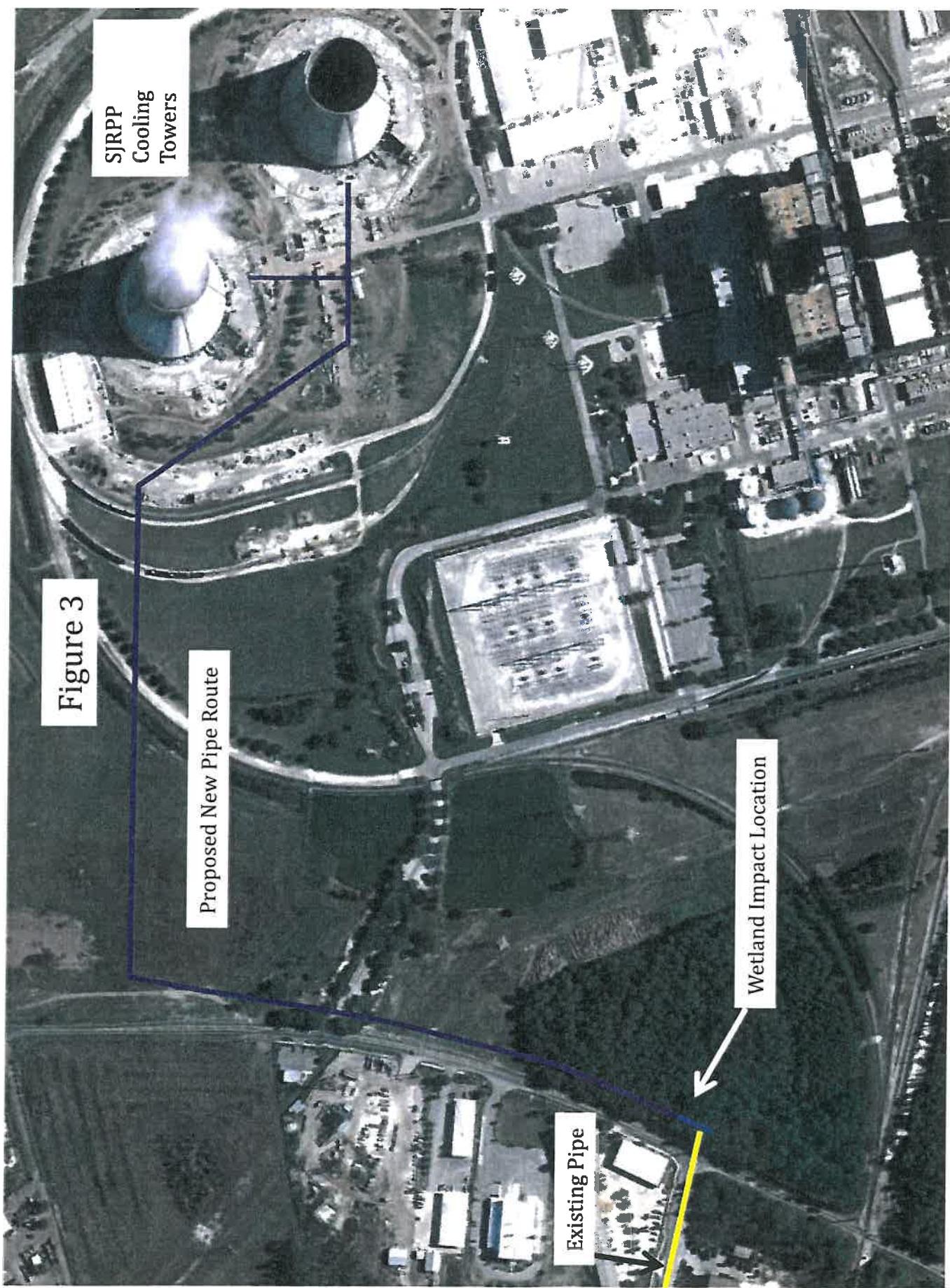


Figure 3