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September 23, 2022

Maurice Barker
Florida Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

RE: Proposed Revisions to 62-604 F.A.C.

Dear Mr. Barker:

The City of Lakeland's Water Utility staff have reviewed the proposed revisions to 62-604 F.A.C. and attended the August 31, 2022 virtual public workshop. The city submits these comments on the proposed changes for consideration by the Department:

1. The proposed requirement to submit O&M manuals should be removed. These manuals contain sensitive information on security, controls, and other details on how to operate a pump station including how to shut it down. Not only should this information not be posted to the Department's website as suggested during the August 31, 2022 workshop, but it should also be excluded from all public records laws. Instead, we recommend manuals be subject to review by Department staff during annual or periodic inspections.
2. The requirement to contact the DEP district office prior to initiating surface water monitoring following an abnormal event is unnecessary and problematic. This step will complicate the response, especially on weekends and holidays when the district office is closed. The local system owner will typically have the most knowledge concerning the stormwater system, potentially impacted waterbodies, and local conditions leading up to and following the event, and therefore, fully capable of developing a sampling plan if needed without prior consultation with Department staff.
3. Finally, the City of Lakeland staff recommend that the rule specifically state whether it applies to both Public and Private systems.



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The City of Lakeland appreciates the opportunity to comment on these proposed rule changes and supports the Department's goals of updating and streamlining the language to improve consistency while supporting resiliency. With the recommended changes herein, we believe the Department will move closer to meeting this goal without placing unnecessary burden on the collection system or Department staff, while also keeping these systems secure.

Respectfully,

Bill Anderson
Director of Water Utilities
City of Lakeland

CC: David Bayhan, Assistant Director of Water Utilities
Rick Ruede, Manager of Wastewater Collection
Sarah Malone, Water Utilities Compliance Manager