From: Tony W. Cubbedge
To: Barker, Maurice
Cc: Colin Groff; Frank Kenton; Gordon Smith
Subject: 62-604
Date: Wednesday, September 7, 2022 7:50:21 AM

EXTERNAL MESSAGE
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Maurice,

We'd like to provide comment to a specific section of 62-604 in current rule making.

We feel 62-604.550 (3) will create challenges with contacting FDEP staff prior to initiating water quality monitoring.

62-604.550 (3) For unauthorized discharges from a collection/transmission system to surface waters that endanger public health or the
environment, the owner/operator of the collection/transmission system shall conduct bacteriological surface water quality
monitoring for the applicable parameters in subsection 62-302.530(6), F.A.C., as soon as possible but no later than 24 hours from
the time the owner/operator becomes aware of the discharge. The owner/operator shall contact the appropriate District Office prior
to initiating surface water quality monitoring.

St. Johns County Utilities often errs on the side of caution and will sample ponds/surface water bodies if we cannot definitively identify if a spill has reached them. Many times the results are less than detection or well below surface water limits and we will cease sampling. How are we to contact the appropriate District Office if a spill occurs on Friday at 5:30 pm? Does leaving a voice message count as contacting them or an email? Do we need to wait for authorization before we initiate sampling? This section seems vague and will lead to trouble and delays in sampling as written.

Thanks for the opportunity to comment.

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