Clean Water Coalition
CWC
of Indian River County, Inc.

TO: eb.roeder@floridadep.gov
FROM: Judy Orcutt
DATE: August 27, 2021
RE: Input on the Discussion from the 1st TAC Meeting

The Clean Water Coalition of Indian River County (CWC) is a 501(c)3 organization whose focus is the restoration and protection of our waters; primarily focused on the Indian River Lagoon and the St. John's River system. In that role, we have worked closely with our local governments to educate the public about the impact of septic systems on our waterways and to try and find solutions to the nutrient loading coming from the 30,000+ septic systems that drain into the Indian River Lagoon – a waterway impaired for nitrogen and **phosphorus**.

The CWC does weekly water sampling for enteric bacteria in the Indian River Lagoon. Our samples are taken following Florida Department of Health (FDOH) Clean Beaches protocol and sent to a State certified lab. Sampling began in January 2020 and may be viewed here: https://www.cwcirc.org/water-quality-monitoring You can easily see that a high percentage of our samples have poor water quality – exceeding EPA's safe recreational water quality limits.

We are thankful that the Clean Waterways Act is requiring a closer look at finding solutions to the Onsite Sewage Treatment and Disposal Systems (OSTDS) problem in Florida. We respectfully request that you consider the following comments:

- The Florida Springs area has received additional funding and higher OSTDS standards to protect this treasure. We would like to recommend that all basins that drain into an impaired water body be treated with equal care. We recommend a significant increase in funding to install and connect to municipal sewer lines that are served by Advanced Wastewater Treatment (AWT) plants that are operated at AWT or potable reuse standards.
- Focus has been on nitrogen reduction only. Since Florida soils typically have a high phosphorus content, we would like to see the phosphorus discharge from OSTDS be measured and accounted for.
- Based on our enteric bacteria sampling, we recommend that more attention is given to bacterial contamination from OSTDS.
- When OSTDS are not operating properly, they are releasing untreated sewage into our groundwater. For that reason, we need to have a statewide inspection program that locates and repairs OSTDS that have cracked tanks, are missing effluent filters, are impacted by a high-water table and/or creating a sanitary nuisance.
- According to the FDOH 2015 OSTDS Nitrogen Reduction Study, Legacy Systems (those installed before 1983) do no remove any nitrogen and they are out of compliance with current regulations. There needs to be a solution to retrofit and/or replace these systems.
- The Conventional Systems, those that are in compliance with current statute, only reduce 30% of the nitrogen load. We recommend that the Rule needs to be updated by increasing the "2 feet separation rule between the drainfield and the high water table" to a greater distance (4 feet separation).
- We support the idea of determining areas that are NOT appropriate for new OSTDS and to focus funding the installation of tested technology or AWT connection in areas of high need.