



August 5, 2010

Tim Powell, P.E.
Florida Department of Environmental Protection
Southeast District Office
400 North Congress Ave, Suite 200
West Palm Beach FL 33401

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

AUG - 6 2010

Dear Mr. Powell,

SITING COORDINATION

Palm Beach County is constructing an approximately 17-mile reclaimed water pipeline from the East Central Regional (ECR) Wastewater Treatment Plant to Florida Power & Light Company's (FPL's) West County Energy Center (WCEC). The pipeline will provide reclaimed water to be used for cooling at WCEC. Following installation of the water pipeline and prior to operation, the line must be flushed. This letter is a written description of our plan to flush the system, as requested in your telephone conversation with David Xavier on July 14, 2010.

The permanent reclaimed water pumps at the ECR plant will pump reclaimed water through the line to flush the system. The reclaimed water will meet the requirements of Part III of Chapter 62-610, Florida Administrative Code (F.A.C.). In order to adequately flush the pipeline, we will use a minimum of 2 pipeline volumes of flush water and could use up to 4 pipeline volumes of flush water. Each pipeline volume is approximately 5 million gallons. Therefore, approximately 10 to 20 million gallons of flush water will be used (2 – 4 volumes of the pipe). The flush is expected to occur in early September 2010. The flush water will be discharged to the south stormwater detention basin at WCEC (see attached Figure 1). In order to adequately flush the line, the water has to be moved at a velocity of at least 2 feet per second. FPL is using reclaimed water as the source of flush water because the pumps in place at the ECR Wastewater Treatment Plant can provide adequately high pressure to achieve the required minimum velocity for the flush of the pipeline. Prior to flushing the system, the entire 17-mile pipeline will be pressure tested at 200 pounds per square inch (psi) for a minimum of two hours in accordance with the requirements of the Palm Beach County Water Utilities Department specifications.

Section 4.2 of FPL's Site Certification Application (SCA) for WCEC Unit 3 states:

"SCA Section 4.2 – Impact on Surface Water Bodies and Uses:...Construction water such as **flush water**, hydrostatic testing water, or other high volume water may be routed to the UIC well system, or treated as necessary and **routed to the stormwater ponds or otherwise allowed to percolate or evaporate.**"

Section 5.1 of the SCA for WCEC 3 states:

"5.1 Effects of the Operation of the Heat Dissipation System...Reclaimed water will be used for Unit 3 cooling system makeup. Reclaimed water used by WCEC Unit 3 will meet all of the requirements for cooling water applications found in 62-610.668, F.A.C..."

In addition, the attached guidance document from DEP specifically addresses discharge of reclaimed water used for flushing. Below are relevant excerpts:

“Reclaimed water that meets the requirements of Part III of Chapter 62-610, F.A.C., is a high-quality water resource. As noted in Sections 403.064 and 373.250, F.S., its use is regarded as being environmentally acceptable and posing no threat to public health. The Department encourages its use for landscape irrigation, agricultural irrigation, and other urban uses (like toilet flushing, street cleaning, fire protection, **line cleaning**, aesthetic uses, and construction dust control). Recognizing this, permitting requirements for use of reclaimed water should be streamlined in order to facilitate its use.”...

“...Reclaimed water meeting the requirements of Part III of Chapter 62-610, F.A.C., may be used for a variety of nonpotable uses in the urban environment. Potential uses of reclaimed water include landscape irrigation, **flushing of sewers and reclaimed water lines**, street cleaning, aesthetic uses (decorative ponds, pools, fountains, and other decorative water features), toilet flushing, construction dust control, and fire protection. Several of these activities may result in the release of water used for the intended purpose into the environment. For example, some water used for street cleaning may flow into storm sewers, swales, or drainage features. In a similar fashion, **water used to flush sewers, reclaimed water lines, or fire protection lines/hydrants may flow into sanitary or storm sewers, swales, or drainage features.**

If reclaimed water is used for these types of activities, its use should not be regulated beyond the degree of regulation imposed when other sources of water (ground water, surface water, potable water) are used for these purposes. Release of the reclaimed water (or other water sources) to the environment after use normally will be considered as a disperse, nonpoint source discharge not subject to NPDES permitting. The reuse permit shall identify the uses being made of the reclaimed water.” [emphasis added]

The guidance document also addresses "storage" of the water in "isolated lakes"

"Isolated Lakes...The use of isolated, non-discharging lakes, which are not waters of the state, to store reclaimed water does not require any form of NPDES permitting. It is recognized that any pond may be subject to overflow during extreme hydrologic conditions (extreme flooding in the area, a hurricane, others). If discharges are limited to such extreme hydrologic conditions, the discharges can be handled under the upset and bypass provisions of Chapter 62-620, F.A.C., even though the wastewater permit issued to the domestic wastewater facility will not be an NPDES permit.

The use of isolated lakes for storing reclaimed water is encouraged.”

The WCEC south stormwater detention basin is an isolated basin that does not discharge to surface water. It is designed to collect stormwater flow from the power plant site and allow it to percolate and evaporate. FPL has analyzed the capacity of the WCEC south stormwater basin to ensure that it is adequately sized to handle the flush water. The south stormwater basin is designed to hold two 25-year 3 day storm events. The WCEC Unit 3 stormwater calculations show that the south stormwater basin would fill with 73.72 acre-feet of water (approximately 24 million gallons) during a 25-year 3 day storm event. A flush of 20 million gallons (worst case), is less than a 25-year 3 day storm event. Therefore, the pond is adequately sized to handle the flush even if it were performed just before or after a 25-year 3 day storm event. FPL will take the weather forecast into account when scheduling the flush to avoid discharging the flush water just before or during a large storm.

Please feel free to call me at (561) 676-7238 or to email me at rachel.godino@fpl.com if you require additional information or have any questions.

Sincerely,



Rachel Godino
Environmental Project Manager
Florida Power & Light Company

Cc: Mike Halpin, DEP SCO
Tim Gray, DEP SED
Brian Shields, Palm Beach County Water Utilities
Maurice Tobon, Palm Beach County Water Utilities
Carine Bullock, FPL WCEC
Tom Young, FPL WCEC
David Xavier, FPL WCEC

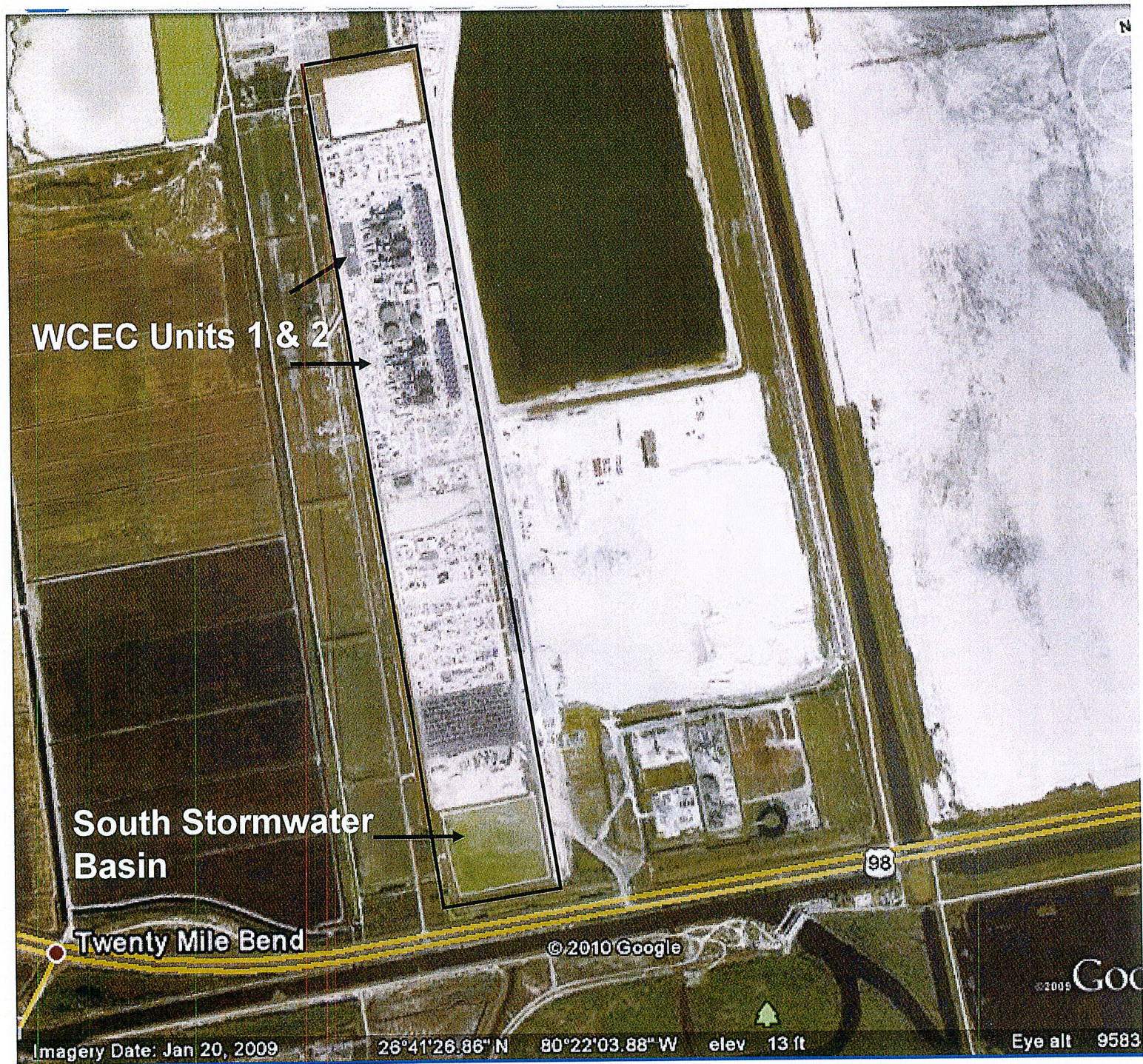


FIGURE 1

ATTACHMENT 1

PROGRAM GUIDANCE MEMO**DOM-96-01**

TO: Water Facilities Administrators

FROM: Mimi Drew, Director
Division of Water Facilities

DATE: April 26, 1996

SUBJECT: Reuse Activities & NPDES Permitting for Golf Course Lakes

This Program Guidance Memo addresses NPDES permitting issues related to reuse systems permitted under Part III of Chapter 62-610, F.A.C. Of particular note is the discussion of golf course lakes and other lakes used for storage of reclaimed water.

I. BACKGROUND

Sections 403.064 and 373.250, F.S., establish the encouragement and promotion of reuse as state objectives. These sections note that reuse is in the public interest and that systems designed and operated in accordance with DEP rules are environmentally acceptable and do not pose threats to public health and safety. Reuse offers significant advantages for both wastewater management and water resource management. As a result, reuse is considered an important part of ecosystem management in Florida.

At the same time, the Clean Water Act essentially requires NPDES permits for any point source discharge of domestic wastewater. With the assumption of NPDES delegation in May 1995, the Department now is charged with application of the Clean Water Act requirements.

Many types of reuse applications will involve relatively disperse release of reclaimed water to the environment after use of the water. Examples include use of reclaimed water for line flushing, street cleaning, and construction dust control. In addition, irrigation of landscaped areas and residential lawns may result in some minor runoff of reclaimed water to storm sewers, drainage ditches, or water bodies.

Of particular interest is the use of golf course lakes (and other lakes and ponds) to store reclaimed water. Many of these lakes are part of the stormwater management system and will discharge intermittently to waters of the state. As noted in previous program guidance memos, some form of permitting is needed for use of these discharging lakes to store

reclaimed water.

II. PHILOSOPHY

Reclaimed water that meets the requirements of Part III of Chapter 62-610, F.A.C., is a high-quality water resource. As noted in Sections 403.064 and 373.250, F.S., its use is regarded as being environmentally acceptable and posing no threat to public health. The Department encourages its use for landscape irrigation, agricultural irrigation, and other urban uses (like toilet flushing, street cleaning, fire protection, line cleaning, aesthetic uses, and construction dust control). Recognizing this, permitting requirements for use of reclaimed water should be streamlined in order to facilitate its use.

III. STORAGE LAKES

The use of golf course lakes (and other lakes and ponds) to store reclaimed water has been discussed in Program Guidance Memos DOM-89-11 (see Section I), DOM-91-01 (see Section V and Exhibit II), and DOM-93-03 (see Section VI). The basic contents of these program guidance memos remain in effect. The key issue involves how to handle these types of systems now that DEP is the NPDES authority. As stated in previous program guidance memos, the use of isolated, non-discharging, non-jurisdictional lakes for the storage of reclaimed water will facilitate the permitting process.

The focus of this program guidance memo is on the use of lakes located on golf courses (will be referred to as “golf course lakes”) to store reclaimed water. However, it also applies to the use of other lakes and ponds (those not located on golf courses) to store reclaimed water.

Rule 62-610.830, F.A.C., addresses storage lakes and ponds. This program guidance memo supplements this rule.

Isolated Lakes

The use of isolated, non-discharging lakes, which are not waters of the state, to store reclaimed water does not require any form of NPDES permitting. It is recognized that any pond may be subject to overflow during extreme hydrologic conditions (extreme flooding in the area, a hurricane, others). If discharges are limited to such extreme hydrologic conditions, the discharges can be handled under the upset and bypass provisions of Chapter 62-620, F.A.C., even though the wastewater permit issued to the domestic wastewater facility will not be an NPDES permit.

The use of isolated lakes for storing reclaimed water is encouraged. Use of isolated lakes significantly reduces the complexity of permitting, eliminates the need for NPDES permitting, and eliminates the need for the annual surveillance fee.

Lakes With Intermittent Discharges

Background: This section deals with golf course lakes (or other lakes or ponds), which are not waters of the state, which will discharge intermittently. While DEP rules do not define “intermittent discharges,” the basic concept is that such discharges occur more frequently than the extreme hydrologic conditions described for isolated lakes. The following paragraphs describe intermittent discharging lakes and their characteristics. Typically, these lakes are part of the stormwater management system. Discharges from these lakes to waters of the state occur in response to storm events. Use of these lakes to store reclaimed water needs to be identified in the wastewater permit for the reuse system. In addition, coordination with the management and storage of surface water (MSSW) permitting entity is needed. Typically, the MSSW entity will be the water management district (WMD). Stormwater management generally is regulated by Chapter 62-25, F.A.C., and applicable WMD rules, as implemented by the MSSW entity. The stormwater management program involves permitting the construction of stormwater management facilities. Operation permits normally are not involved for stormwater facilities.

If the lake which will receive reclaimed water is part of the stormwater management system, it is essential that the lake have sufficient capacity to accommodate both uses (reclaimed water storage and stormwater management). In accordance with Rule 62-610.830(4), F.A.C., the applicant for the wastewater permit for the reuse system must provide written concurrence from the MSSW entity that the lake has sufficient volume to serve both functions. The applicant must provide this documentation with the initial permit application.

Figures 1 and 2 illustrate the basic concepts involved in the use of a stormwater management pond for storage of reclaimed water. The ponds typically are constructed with a control structure (weir, standpipe, or other device). The “full pool level” (Level A in Figures 1 and 2) corresponds to the condition where the pond is at the invert elevation of the peak discharge or rate control device (the weir invert in Figures 1 and 2). If the pond is at the full pool level, any additional input of water into the pond will result in rapid discharge from the outlet structure. The “control elevation” (Level B in Figures 1 and 2) represents the maximum water level that will ensure availability of sufficient volume for the storage and treatment of stormwater. Typically, the volume between Level B and Level A represents the volume needed for storage and treatment of the first 0.5 inch or 1.0 inch (depending on the area) of runoff from the tributary watershed (this is based on current requirements in Chapter 62-25, F.A.C. -- for discharges to Outstanding Florida Waters, the stormwater volume is increased by 50 percent). The WMD’s stormwater rules may be more stringent than the Chapter 62-25, F.A.C., requirements.

Normally, the peak discharge or rate control device (the weir in Figures 1 and 2) is sized to route some predetermined design storm for flood control purposes.

Following a rainstorm which results in discharge over the weir, the water level in the pond will fall to Level A as discharges over the weir diminish. At Level A, there is no available volume in the lake for storage and treatment of stormwater. As a result, most ponds will feature some form of bleed-down device located below Level A. This normally will be a small orifice or V-notch weir, an underdrain in the berm or bank, or other device in the

control structure. This bleed-down device will enable recovery of the stormwater storage and treatment volume (between Level B and Level A). As a result, a minor discharge will occur for a period of time after the end of a rainstorm (7-8 days are typical). This frees up storage volume for the next rain event. Recovery of the stormwater storage and treatment volume may be expedited by pumping out of the lake for irrigation during the period following the rainstorm.

The bleed-down device normally is located at the control level (as shown in Figures 1 and 2). Also, the bleed-down device normally is located above the ground water level to avoid continuous discharges.

Permitting Approach: Normally, the MSSW entity will be interested in ensuring that a predetermined volume is available in the lake to accommodate some volume of runoff (the volume between Level B and Level A in Figures 1 and 2). The result is that the lake volume below the control elevation is potentially available for use as storage for reclaimed water. Consideration of stormwater storage and treatment volume requirements will be left to the MSSW entity. The Department should work with the applicant and the MSSW entity to determine this control elevation. The reuse system permit (issued to the domestic wastewater facility permittee) will prohibit discharge of reclaimed water to the lake during periods when the actual pool elevation is above the control elevation. The control elevation must be identified in the reuse system permit.

It is recommended that the permit require a staff gauge in the lake receiving the reclaimed water.

The Department will regulate discharge of reclaimed water into the lake using technology based effluent limits (TBELs). The TBELs will be established on the basis of the quality requirements for a reuse system permitted under Part III of Chapter 62-610, F.A.C. (secondary treatment, high-level disinfection, 5.0 mg/L TSS). The points of reclaimed water monitoring will be the standard points at the treatment facility for a Part III reuse system.

Reclaimed water discharge into the lake should cease when the lake level reaches the control level. As a result, any discharges from the lake to waters of the state likely will consist primarily of stormwater. As a result, the discharges out of the lake are not subject to limitations imposed by the Grizzle-Figg or Indian River Lagoon Acts.

Some golf course lakes are constructed and operated such that the lake is always (or almost always) full (i.e., the water level is maintained at Level A). In this case, any discharge of reclaimed water into the lake normally will result in a discharge out of the outlet structure. This situation should be handled as a continuously discharging lake system (possibly including water quality based effluent limits [WQBELs] at the discharge point from the lake). The provisions for intermittently discharging lakes are not appropriate for this situation.

Monitoring Lake Discharges: The EPA has requested that domestic wastewater facility

permits authorizing such a discharge be designated as NPDES permits with TBELs on the influent to the golf course lakes and minimal flow monitoring on discharges out of the lakes. The permit shall require reporting of the frequency and duration of lake discharges. This may be based on visual observation. There is no need for automatic sensing and recording equipment.

The permittee (the wastewater facility permit holder) ultimately will be responsible for this monitoring (observation). Of course, this monitoring task may be delegated to golf course personnel, at the discretion of the golf course and the permittee.

For purposes of this permitting activity, "discharge" will mean release of water from the pond via the overflow or peak discharge control structure (weir, standpipe, or other device). Discharge of water from a bleed-down device (orifice, drain pipe, or other device) shall not be considered as a "discharge." Flow out of the bleed-down device shall be considered as a "timed release of treated stormwater, subject to the rebuttable presumption that the facility would not be expected to cause or contribute to violation of water quality standards."

Permit Condition: The Department will include the following condition in the domestic wastewater permit:

Discharge of reclaimed water to _____
_____ (insert name/description of lake) at
_____ (insert name of the golf course) shall only occur
when the elevation of the water in the lake is less than or equal to
_____ ft. M.S.L. (insert the control elevation for stormwater
management). A list of all days during a month on which
discharges from _____ (insert
name/description of the lake) to _____ (insert name of
the receiving water body) occurred shall be attached to the DMR
form. For each day on which discharge occurred, the approximate
number of hours of discharge shall be noted.

Permit Fees: Consistent with Rule 62-4.052(8), F.A.C., the NPDES regulatory program and surveillance fee for use of these golf course lakes as storage is \$200 per year for each golf course. In no case will the sum of all golf course storage fees exceed the NPDES regulatory program and surveillance fee for a domestic wastewater treatment facility having a surface water discharge. The annual NPDES fee will be charged to the wastewater facility owner. A single \$200 fee will cover all lakes (with intermittent discharges) used to store reclaimed water on a single golf course.

Control Strategies: The approach outlined in this section dealing with use of intermittently discharging lakes to store reclaimed water needs to be incorporated into the permittee's operation and maintenance (O&M) procedures. Constraints on discharge to storage ponds based on water level in the ponds and monitoring (observation) and reporting of the frequency of discharge out of the ponds need to be formalized. These

concepts may merit inclusion in the agreement between the wastewater facility permittee and the golf course. The details of the operation of the storage system need to be included in the O&M manual and/or the operating protocol.

Lakes Which are Waters of the State

Lakes which are waters of the state may be used to store reclaimed water. However, reclaimed water limitations must be established to ensure that appropriate water quality criteria will be met in the lake and in downstream water bodies. This probably will include the establishment of WQBELs. All state and NPDES permitting requirements apply. The point of final compliance monitoring will be at the point of discharge into the lake.

Lakes Which Discharge Continuously

Use of lakes which continuously discharge to waters of the state will be done on a case-by-case basis. The permitting approach will range from the requirements imposed on intermittently discharging lakes to the full requirements for lakes which are waters of the state. The level of permitting involvement will be dictated by the physical characteristics of the lake system and the discharge structure, nature of the receiving water body, and the relative flows of reclaimed water, other sources tributary to the lake, and flows in the receiving water.

Retrofit of Existing Lakes or Ponds

Rules 62-610.464 and 62-610.414, F.A.C., contain requirements for the construction of new storage ponds. The requirements in Rule 62-610.414, F.A.C., deal with side slopes, freeboard, minimum pond water depth, and emergency overflow devices. Many projects permitted under Part III of Chapter 62-610, F.A.C., will use existing lakes or ponds to store reclaimed water. For these existing lakes, the DEP will not require retrofit or reconstruction of these lakes to meet the construction standards in Rule 62-610.414, F.A.C. The requirements of Rule 62-610.830, F.A.C., shall apply.

The Permittee

The permit for the treatment and reuse facilities shall be issued to the owner/operator of the domestic wastewater treatment facility. A separate reuse permit shall not be issued to a golf course.

There are several instances in which the EPA issued a separate NPDES permit to a golf course. The Department will not continue this practice. Permits issued by EPA for individual golf courses will not be renewed by the Department. The Department will include appropriate permit conditions in the permit for the domestic wastewater and reuse facilities. The next section of this guidance memo describes the procedures to be used in handling the transition of permits for golf courses which currently have NPDES permits.

Transition Procedures for Golf Courses with NPDES Permits

The above discussion addresses the idealized case of how to permit discharges to golf course lakes. While this policy will be fairly straightforward to implement for new discharges, it will be more challenging for existing discharges to golf course lakes where EPA issued a separate NPDES permit to the golf course. This section addresses how to handle existing permitted discharges, with guidance divided into the two possible scenarios: 1) cases where the wastewater treatment plant (WWTP) permit expires first, and 2) cases where the golf course permit expires first.

When the WWTP Permit Expires First: This scenario is the easier of the two. When renewing the WWTP permit, we simply need to address the discharge of reclaimed water to the golf course lake as described previously. Upon issuance of the renewal permit, the Department should notify the responsible authority for the golf course that they can terminate their wastewater permit. District staff should complete the necessary termination paperwork and copy the Wastewater Facilities Management Section (WFMS) on the letter to the permittee. The WFMS will be responsible for updating the Permit Compliance System (PCS).

When the Golf Course Permit Expires First: In this scenario, District staff need to **initiate** revision of the WWTP permit before expiration of the golf course permit. We had previously thought we had to complete the revision to the WWTP permit before we could allow the golf course permit to expire. Since the revision would be classified as a substantial revision which takes a relatively long time to process, we also previously recommended that District staff request the golf course to apply for renewal (including the application fee) but not act on the renewal - so that their permit would be administratively continued until the WWTP permit was revised.

However, the January 9, 1996 version of the reuse rules provides "good cause", as described in Section 62-620.325, F.A.C., to unilaterally revise the WWTP permit to address the discharge to the golf course lake. Rule 62-610.490(1), F.A.C., states that DEP will issue a single permit to the WWTP and that the WWTP will regulate individual users (like a golf course) through binding agreements or local ordinances.

Once you initiate the revision for good cause, you can use discretion (based on the fact that we are revising the WWTP permit) to not initiate enforcement against the discharges to the lakes even if the golf course permit expires before completion of the revision to the WWTP permit. Thus, once you have initiated the substantial revision, using a letter as described below, you can allow the golf course permit to officially expire (without renewal application). This will save the golf course permittee the frustration and cost of applying for renewal when we do not plan to act on the renewal.

If you complete the substantial revision before expiration of the golf course permit, you should complete the termination paperwork for the golf course permit as described in the discussion of Case 1. If the golf course permit expires first, District staff still should notify the WFMS that the golf course permit will not be renewed so they can officially

inactivate the permit in PCS.

To initiate the substantial revision, District staff should prepare a letter to the responsible authority for the WWTP permit informing him/her that we have "good cause" as directed under Rules 62-620.325 and 62-610.490(1), F.A.C., to revise their permit to address the discharge to the golf course lake. The letter (see Exhibit I) will include a notice advising the permittee of their rights under Section 120.57, F.S., to petition for an administrative hearing. The letter will state that there is no application fee associated with the revision (because it was initiated by the Department). If any additional information is needed about the operation of the golf course lake system (appropriate control level), the District should contact the golf course and possibly the MSSW entity.

Golf Course Lakes and Limited Wet Weather Discharges

Rule 62-610.860, F.A.C., provides for limited wet weather discharges for reuse projects. The following paragraphs address the potential use of golf course lakes as limited wet weather discharges.

Isolated Lakes: These lakes are not candidates for use as limited wet weather discharges.

Lakes With Intermittent Discharges: In this case, the permitting approach outlined in this program guidance memo is more favorable than is the limited wet weather discharge provision. It is recommended that the limited wet weather discharge provisions not be used for intermittently discharging lake systems.

Lakes Which are Waters of the State: The limited wet weather discharge provisions can be used in this case, but only if the other sources of flow through the lake provide sufficient dilution. The lake would have to be a flowing water body during periods in which reclaimed water was discharged to the lake.

Lakes Which Discharge Continuously: The limited wet weather discharge provisions can be used in this case, but only if the other sources of flow through the lake provide sufficient dilution.

IV. UNDERDRAINS

Many golf courses provide underdrains beneath tee boxes, greens, bunkers, or traps in order to maintain playable conditions and to protect valuable turf grass. During (and probably after) storm events these underdrains will collect water and discharge. Typically, discharge from the underdrains is routed to lakes on the golf course which are part of the stormwater management system. Reclaimed water meeting the requirements of Part III of Chapter 62-610, F.A.C., will be treated no differently from other sources of irrigation water. Discharges from the underdrains will be considered a nonpoint source, stormwater discharge. Such underdrains do not need to be mentioned in the reuse permit.

V. LINE FLUSHING, STREET CLEANING, LANDSCAPE IRRIGATION,

AESTHETIC USES, AND OTHER URBAN USES

Reclaimed water meeting the requirements of Part III of Chapter 62-610, F.A.C., may be used for a variety of nonpotable uses in the urban environment. Potential uses of reclaimed water include landscape irrigation, flushing of sewers and reclaimed water lines, street cleaning, aesthetic uses (decorative ponds, pools, fountains, and other decorative water features), toilet flushing, construction dust control, and fire protection. Several of these activities may result in the release of water used for the intended purpose into the environment. For example, some water used for street cleaning may flow into storm sewers, swales, or drainage features. In a similar fashion, water used to flush sewers, reclaimed water lines, or fire protection lines/hydrants may flow into sanitary or storm sewers, swales, or drainage features.

If reclaimed water is used for these types of activities, its use should not be regulated beyond the degree of regulation imposed when other sources of water (ground water, surface water, potable water) are used for these purposes. Release of the reclaimed water (or other water sources) to the environment after use normally will be considered as a disperse, nonpoint source discharge not subject to NPDES permitting. The reuse permit shall identify the uses being made of the reclaimed water.

Regardless of the source of the water used (surface water, ground water, potable water, or reclaimed water), landscape irrigation in an urban environment may result in some surface runoff or possible overspray of adjacent areas (possibly including adjacent surface water bodies). Release of the reclaimed water (or other water sources) to the environment resulting from surface runoff from landscape irrigation or from overspray of adjacent areas normally will be considered as disperse, nonpoint source discharges not subject to NPDES permitting.

It is recommended that permittees implementing urban reuse systems develop best management practices (BMPs) for these types of reuse activities. The BMPs should be designed to ensure that reclaimed water is used in an environmentally sound fashion, which will not result in point source discharges to the environment. To avoid point source discharges, the BMPs should describe efforts to avoid scouring and the associated development of discrete channels.

MD/wf/dwy

cc: Directors of District Management
DEP Branch Office Managers
DEP Satellite Office Managers
Local Programs
Reuse Coordinating Committee

PREVIOUS REUSE GUIDANCE MEMOS:

DOM-89-08 (superseded by DOM-89-11)

DOM-89-10	Fire Protection
DOM-89-11	Implementation of Reuse Rules
DOM-90-02	(superseded by DOM-92-01)
DOM-91-01	Implementation of Revised Reuse Rules
DOM-91-04	Toilet Flushing
DOM-91-05	Environmental Enhancement Reuse
DOM-91-06	Reuse
DOM-91-08	Cross-Connection Control Programs
DOM-93-02	Operating Protocols
DOM-93-03	Reuse
DOM-94-02	Backup Discharges for Reuse Projects
DOM-95-01	1994 Reuse Legislation

DOMESTIC WASTEWATER PROGRAM MANUAL KEYWORDS:

Golf Course
 Lakes
 Line Flushing
 NPDES Permitting
 Overspray
 Public Access
 Reuse
 Storage
 Stormwater
 Street Cleaning
 Underdrains

Exhibit I

Letter to the WWTP Permittee Notifying Them of DEP's Intent to Add a Golf Course to Their Permit

Certified Mail

{Date}

DEP File No.: _____

Dear _____:

Reclaimed water from _____ {WWTP facility name} currently is used at _____ {golf course name}. Previously, the U.S. Environmental Protection Agency (EPA) issued a separate National Pollutant Discharge Elimination System (NPDES) permit to _____ {golf course name} authorizing discharges from the golf course lakes. As you may be aware, the Department of Environmental Protection was delegated authority for the NPDES program on May 1, 1995. Under Department rules 62-610.490(1) and 62-610.800(4)(b) of the Florida Administrative Code (F.A.C.), the permit previously issued to _____ {golf course name} cannot be renewed.

Therefore, the Department is initiating a revision to the permit for _____ {WWTP facility name} to include the discharge to _____ {golf course name} in your permit. This revision will constitute a substantial revision to your permit and will take approximately _____ days (see attached project decision schedule).

The permit revision is being initiated for good cause under the provision of rule 62-620.325(2)(c), F.A.C. Because the Department is initiating this procedure, there will be no permit revision fee associated with this revision. However, you may be required to publish a public notice of this permit revision in a newspaper of general circulation. Furthermore, no additional information or application forms are needed for the Department to make this revision.

The permit revision will include the following requirements:

1. Technology based effluent limits for discharges into the lake (based on high-level

disinfection requirements);

2. Flow monitoring for discharges out of the lake (frequency and duration of discharges); and
3. Limitations on when discharge is allowed to the lake (based on water level in the lake).

This letter does not serve as the permit revision. The Department will provide you with a copy of the draft revisions for your review and comment when they are completed. When the revisions are finalized, you will have the opportunity to challenge the permit revision under the provisions of Chapter 120 of the Florida Statutes. In the meantime, if you have any questions about this situation, please call _____ at _____.

Sincerely,

Director of District Management

cc: Daryll Joyner - DEP/Tallahassee
_____ - DEP/ District WFA
_____ - DEP/ District permitting Engineer
_____ - {golf course name}

Figure 1. Discharge Control Structure

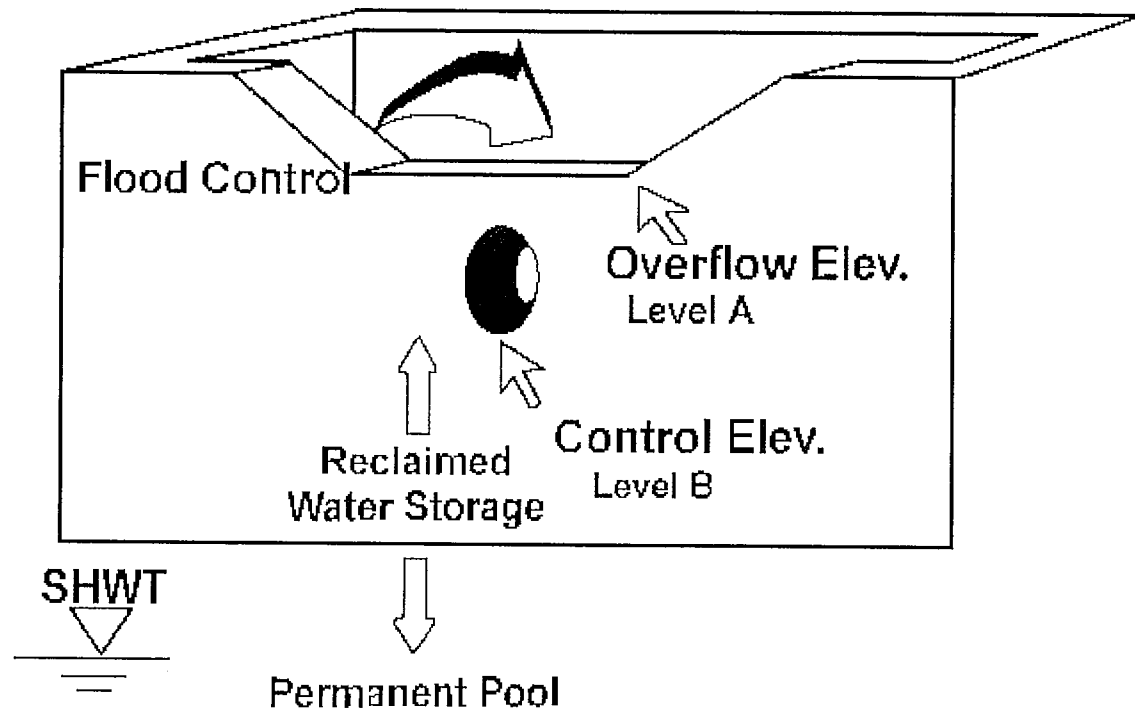


Figure 2. Stormwater / Reclaimed Water Storage Requirements

