



# Everglades Coalition

February 20, 2019

Benjamin M. Melnick, Deputy Director,  
Division of Water Resource Management  
Marc Harris, P.E., Environmental Administrator  
Florida Department of Environmental Protection  
2600 Blair Stone Road,  
Tallahassee, Florida, 32399-2400  
*Sent Via Email*

**Re: NPDES Permit No. FL0001562, PA File No. FL0001562-012-IW1N**

Dear Mr. Melnick and Mr. Harris,

On behalf of the Everglades Coalition's 63 organization, we wish to express our concern with the Florida Department of Environmental Protection's (DEP) proposed draft National Pollutant Discharge Elimination System (NPDES) permit renewal (DEP File No. FL0001562-012-IW1N) for Florida Power & Light's (FPL) Turkey Point power plant's wastewater treatment and effluent disposal facilities for Units 3, 4, and 5.

The provisions of the permit renewal will play an important role in determining future impacts of the Turkey Point plant cooling canal system (CCS) on the surrounding region, including adjacent Everglades Restoration projects and on the lower east coast regional water supply.

FPL's Turkey Point facility's CCS has been leaking hypersaline water and contaminants into groundwater for decades. And since 2014 it has been shown to have reached surface waters of a National Park and Marine Sanctuary, as well. The CCS is a 5,900-acre network of unlined cooling canals that has had and will continue to have adverse impacts on water quality in Biscayne Bay and adjacent wetlands and the Biscayne Aquifer to the west – which is the drinking water resource for Miami-Dade County and the Keys.

This draft NPDES permit renewal varies considerably from the original NPDES permit in that the permit renewal seems to allow discharges into surrounding groundwater and explicitly provides that groundwater discharges that migrate to surface water via the porous limestone, shall not be a violation of the permit or surface water quality standards. The following are some questions we have for the department to clarify our concerns:

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1000 Friends of Florida  
Arthur R. Marshall Foundation  
Audubon Florida  
Audubon of Southwest Florida  
Audubon of the Western Everglades  
Audubon Society of the Everglades  
Backcountry Fly Fishers of Naples  
Bullsugar Alliance  
Calusa Waterkeeper  
Cape Coral Friends of Wildlife  
Center for Biological Diversity  
Conservancy of Southwest Florida  
Defenders of Wildlife  
"Ding" Darling Wildlife Society  
Earthjustice  
Environment Florida  
Everglades Foundation  
Everglades Law Center  
Everglades Trust  
Florida Conservation Voters Education Fund  
Florida Defenders of the Environment  
Florida Keys Environmental Fund  
Florida Native Plant Society  
Florida Oceanographic Society  
Friends of the Arthur R. Marshall  
Loxahatchee National Wildlife Refuge  
Friends of the Everglades  
Hendry-Glades Audubon Society  
International Dark-Sky Association,  
FL Chapter  
Izaak Walton League of America  
Izaak Walton League Florida Division  
Izaak Walton League Florida Keys Chapter  
Izaak Walton League Mangrove Chapter  
Lake Worth Waterkeeper  
Last Stand  
League of Women Voters of Florida  
Martin County Conservation Alliance  
Miami Pine Rocklands Coalition  
Miami Waterkeeper  
National Audubon Society  
National Parks Conservation Association  
National Wildlife Refuge Association  
Natural Resources Defense Council  
North Carolina Outward Bound School  
Ocean Research & Conservation Association  
Reef Relief  
Sanibel-Captiva Conservation Foundation  
Sierra Club  
Sierra Club Florida Chapter  
Sierra Club Broward Group  
Sierra Club Calusa Group  
Sierra Club Central Florida Group  
Sierra Club Loxahatchee Group  
Sierra Club Miami Group  
Snook and Gamefish Foundation  
South Florida Audubon Society  
Southern Alliance for Clean Energy  
The Florida Wildlife Federation  
The Institute for Regional Conservation  
The National Wildlife Federation  
The Urban Environment League of  
Greater Miami  
Theodore Roosevelt Conservation  
Partnership  
Tropical Audubon Society

- Has the department considered how the continued use of the CCS under the proposed permit renewal will impact the Biscayne Bay Costal Wetlands Projects (Phase I and II) and the C-111 spreader canal projects?
- Is it the department's intent to allow industrial wastewater from the CCS to be discharged through the porous limestone underlying the CCS into the surface waters of Biscayne Bay, a protected Outstanding Florida Water?
- Has the department provided any effluent limitations on these discharges if they are permitted or any requirements to line or otherwise confine the CCS?
- Has the department considered continued function of this facility given the CCS is at sea-level and has already been breached during category 1 hurricanes like Irma, allowing surface to surface water contact?
- Is it department's intent to change the protective boundary delineating the G-II and G-III aquifer in the attached 1983 map?
- How were the surface water monitoring locations selected? The locations identified are not clear compliance boundaries of protected areas that could properly identify the appropriate water quality standards that apply.
- Has the agency been made aware of the degradation of the L-31 E canal system and its subsequent impacts to the surface waters in the wetlands to the west? Our concern is that these wetlands have been protected for conservation and CERP projects. What water quality standards will apply to protect the surface waters of the US to the east of the plant and the L-31E to the West?
- Is the department aware that the weir separating the L-31 E canal water from waters of the US is opened during high rain events and those waters comingle with protected waters of the US, as was the case leading up to Hurricane Irma?
- Will antidegradation standards be required to protect Biscayne Bay from the treated wastewater that FPL's canal "freshening" will likely use to comply with DEP's Consent Order? What are those standards?

We ask that DEP provide clarifying answers and reasonable assurances to our concerns in an open and transparent manner and revise the draft permit to protect the resources of the greater Everglades ecosystem.

Sincerely,



Mark Perry  
Co-Chair



Marisa Carrozzo  
Co-Chair

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