State of Florida



ORIGINAL

Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: March 9, 1999

TO: Blanca Bayo, Director of Records and Reporting

FROM: Bob Casey, Professional Accountant Specialist, Water and Wastewater Division

RE: Docket No. 971186-SU, Application for Approval of Reuse Project Plan by Sanlando

Utilities Corporation in Seminole County

Please place the attached letter from Sanlando Utilities Corporation (Sanlando) in the above docket file. The letter details a proposed joint reuse project between Sanlando and the City of Altamonte Springs. Thank You.

cc: Division of Water and Wastewater (Hill, Willis, Rendell)
Division of Legal Services (Gervasi)

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SANLANDO UTILITIES CORPORATION

AN AFFILIATE OF UTILITIES, INC. 200 WEATHERSFIELD AVENUE ALTAMONTE SPRINGS, FLORIDA 32714

CORPORATE OFFICES: 2335 Sanders Road Northbrook, Illinois 60062 Telephone: 847-498-6440

Telephone: 407-869-1919 Florida: 800-272-1919 Fax: 407-869-6961

March 4, 1999

Chuck Hill Director of Water and Wastewater Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 RECEIVED

MAR - 8 1999

Florida Public Service Commission
Division of Water and Wastewater

RE: Proposed Joint Reuse Program

Dear Mr. Hill:

The purpose of this letter is to introduce to you a program which Sanlando Utilities Corporation (Sanlando) and the City of Altamonte Springs (City) are pursuing and to request your support for the project. We would appreciate your input and that of your staff. As yet no cost estimates have been done, but we expect the project to fall in the \$2 to \$3 million range.

We are sending a similar letter to environmental groups, homeowners' associations, potential major reuse customers and other interested parties. We are inviting their comments and offering to meet with them to discuss the proposal.

The enclosed document presents a joint reuse concept between Sanlando and the City. A simple schematic is also provided to illustrate the project as currently envisioned. The joint reuse concept contemplates Sanlando's Wekiva WWTP going to 100% reuse and provides a mechanism whereby a significant percentage of the highly treated effluent would be delivered to the City's existing Project APRICOT transmission and distribution system.

Sanlando is pursuing 100% reuse as part of its new parent company policy to reduce or eliminate surface water discharge at all its facilities. The City expects to benefit from reduced reliance on groundwater augmentation for Project APRICOT.

After reviewing the enclosures, we would appreciate your written comments. If you have any questions please do not hesitate to call either Sanlando or the City.

Sincerely,

Jerry M. Salsano Regional Manager

Enclosures

Cc: See Distribution List

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CPH Engineers
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Orlando, FL 32801
Altamonte Springs Reuse File



CITY OF ALTAMONTE SPRINGS

225 NEWBURYPORT AVENUE
ALTAMONTE SPRINGS, FLORIDA 32701-3697

March 4, 1999

Chuck Hill
Director of Water and Wastewater
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Sincerely,

Glenn E. Forrest

Director of Public Works

Enclosures

Cc: See Distribution List

Altamonte Springs and Sanlando Utilities Proposed Joint Reuse Program

The purpose of this paper is to present preliminary details on the concept of a joint reuse program between the City of Altamonte Springs and Sanlando Utilities Corporation and to promote input from outside parties and regulators. Sanlando was recently sold to Utilities Inc. but will retain its corporate identity.

Joint Reuse Objectives

Sanlando and the City desire to supplement the City's reuse system with treated effluent from the Sanlando Wekiva Plant. This form of augmentation will significantly reduce or eliminate any Wekiva Plant discharge to Sweetwater Creek. It will also serve to reduce groundwater withdrawals by the City. The joint reuse program will strive to minimize or eliminate additional wet weather discharge to the Little Wekiva River.

Program Concept

The basic concept of the joint reuse program is to directly interconnect the proposed reclaimed water system of the Wekiva Plant with the City's reclaimed water distribution system known as Project APRICOT. Based on initial research, the connection would occur in the Sand Lake Road area, just east of west Lake Brantley Road, or possibly further south in the SR 436 / Pearl Lake Causeway area, depending on evaluation of the economics and other technical details yet to be refined.

Sanlando's Wekiva Plant FDEP / NPDES permit is 2.9 million gallons per day (MGD) of wastewater treatment capacity. The Wekiva Plant currently operates at approximately 2.2 to 2.4 MGD with no reuse capability. The City's Regional Water Reclamation Facility (RWRF) is a 12.5 MGD plant. Currently, RWRF average daily flows are in the range of 6.5 MGD to 7.0 MGD. APRICOT demand during April through August ranges from 8 to 10 MGD. There is an existing agreement between Sanlando and the City for treatment of up to 500,000 gpd of Sanlando raw wastewater at the City's RWRF.

Presently, the Wekiva Plant discharges its highly treated effluent to Sweetwater Creek. Under its proposed new operating permit, the Wekiva Plant will be permitted for a reclaimed water production facility with 1.0 MGD to 1.3 MGD capacity. With the possibility of a joint reuse program with the City, Sanlando will consider constructing a reclaimed water facility capable of 100% reuse, with the majority of the daily flow going to Project APRICOT, thereby greatly reducing surface water discharge to Sweetwater Creek.

There is more than ample room at the Wekiva Plant site to accomplish the necessary plant expansion. Along with its connection to the City's APRICOT system, Sanlando will supply approximately 600,000 gallons per day of reuse to at least two large customers, the Wekiva Golf Club and a nursery known as the Brantley Plant Corporation.

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Sanlando Wekiva Plant

The existing Wekiva Plant consists of three contiguous "package" wastewater treatment plants currently permitted at 0.97 MGD each. The treatment trains are connected in parallel and produce a high quality effluent. Four existing percolation ponds previously functioned as a continuous effluent disposal system until December 1990. To divert flow for maintenance purposes, the ponds were converted to an intermittent rapid rate restricted public access land application system with a total wetted area of approximately 338,000 square feet. The intermittent use of the ponds is exempt from groundwater monitoring requirements.

City and Sanlando Plant Discharge Locations

When APRICOT demand is less than the effluent flow from the City's RWRF, discharge occurs to the Little Wekiva River (LWR) at a point east of Trout Lake approximately 4 miles upstream from SR 434. Downstream of SR 434, the LWR becomes an Outstanding Florida Water (OFW). From there, it is approximately 5 miles to its confluence with the Wekiva River. Sweetwater Creek joins the Wekiva River approximately 4 miles upstream from this confluence. The existing Wekiva Plant discharge is to Sweetwater Creek.

The joint reuse program will create conditions where the RWRF discharge to LWR may increase. That magnitude and frequency of the increased discharge depend on rainfall and system design constraints but may reach approximately 1 MGD for very brief periods (hours long) during prolonged rainfall events. Although the overall augmentation of APRICOT would be reduced, the potential for increased discharge through the City's LWR outfall would add to the City's responsibilities and RWRF compliance requirements, including associated costs and liabilities, for effluent monitoring and reporting. The potentially higher discharge level, however, would still be significantly below the RWRF's permitted discharge. The overall benefit of joint reuse includes significant reduction of groundwater augmentation to meet APRICOT demand.

Driving Forces

Sanlando has proposed the joint reuse concept to the City to reduce environmental and regulatory pressures associated with its effluent discharge to the Sweetwater Creek / Cove Lake surface water system. The City's Project APRICOT has achieved excellent water conservation resulting in a 40% reduction of groundwater withdrawals, saving over two billion gallons of water per year. However, since the City must augment Project APRICOT with groundwater during times of high irrigation demands, there remains an environmental incentive for the City to enter into a joint reuse agreement and thereby further reduce groundwater withdrawals.

It is anticipated that neither party will incur a utility rate payable to the other. As currently proposed by the Public Service Commission (PSC), all Sanlando reuse costs are to be borne by existing water and wastewater customers, with no reuse rates. The PSC, however, may change that position if a joint reuse program is proposed. The City's utility is not under the jurisdiction of the PSC.

Both parties will remain responsible for meeting requirements of their plant operating permits. The goals of both parties are to enhance the City's reuse system, reduce groundwater withdrawals,

reduce/minimize total surface water discharge and maintain the high regard by all regulatory agencies that both utilities currently enjoy. Each party is expected to bear its own capital costs, to include agreed-upon control arrangements. Regulatory requirements will include reuse monitoring and operating protocols to ensure reclaimed water quality, specifically with regard to chlorine residuals, total suspended solids, and new 62-610 reuse rule provisions. The City will require an inter-utility telemetry system to document conditions under which Sanlando's flow to APRICOT would be "on" or "off." It will be Sanlando's objective to design and install the optimum quantity of wet weather storage to minimize or eliminate any additional wet weather discharge to the LWR and to minimize any wet weather discharge to Sweetwater Creek.

Plant Operating Permits

The Sanlando Wekiva Plant operating permit will require a modification to expand the proposed reuse system from 1.3 MGD to 2.9 MGD and to provide for wet weather discharge to Sweetwater Creek. Sanlando will consider increasing its operator attendance to 24 hour staffing and broadening the scope of its onsite laboratory. The City's RWRF operating permit, which requires renewal in November 2001, will require a modification, at that time or before, to allow for Sanlando's connection to the APRICOT reclaimed water distribution system.

Potential Disincentive

A disincentive for the joint reuse program is the level of potential objection by interest groups or communities along the Little Wekiva River which may perceive an adverse impact. Net environmental benefits and regulatory policies must be weighted against this potential political disincentive.

There is a base of data documenting that the RWRF discharge is of a higher water quality than the "background" in the LWR, due to the LWR's urbanized watershed, thereby benefitting the LWR. There is also benefit of contributing to LWR minimum flows and levels, consistent with St. Johns River Water Management District's (SJRWMD) policies. There may be a community concern, however, of sedimentation effects from erosion during higher creek flows when there is wet weather, although there have been significant improvements recently constructed and underway to mitigate LWR erosion through bank stabilization projects.

The magnitude of flow contribution from the RWRF as compared to creek flows in the LWR, can be considered minimal or even negligible. The LWR bank stabilization improvements have been initiated by the SJRWMD Little Wekiva Technical Working Group (LWRTWG), of which the City and Sanlando are both active participating members.

Benefits

Both utility organizations have a good regulatory compliance record and a positive working relationship with each other and the agencies. There would be a net reduction of effluent discharge for the Wekiva River system and reduced groundwater withdrawals. The joint reuse program would be aligned with Florida Department of Environmental Protection (FDEP) philosophy and would be consistent with the St. Johns River Water Management District's (SJRWMD) Water 2020 plan.

Conclusion

There is an interest by both the City of Altamonte Springs and Sanlando Utilities Corporation to further pursue the joint reuse program to realize the environmental benefits thereof, and to solicit input from regulators and affected parties. The City's Project APRICOT shall preserve its reputation for water quality and reliability. Sanlando's proposed Wekiva Plant reuse system shall maintain the same high standards by which the existing system operates and align its procedures to be consistent with Project APRICOT. Based on very preliminary discussions with representatives from the Florida Audobon Society and the Friends of the Wekiva, the joint reuse program concept may be generally perceived by environmental interest groups in a positive light.

For program development and acceptance, and to achieve the generally accepted goals of environmental protection and water conservation, the City and Sanlando will request feedback from interested citizens and governmental agencies on the joint reuse concept.

Glenn E. Forrest, P.E., Director of Public Works

City of Altamonte Springs, Florida

Donald Rasmussen, Vice President Sanlando Utilities Corporation

Salsano, P.E., Regional Manager

indo Utilities Corporation

