



Florida Water Environment Association Utility Council



2013 Annual Report



President's Message

The primary objective of the FWEA Utility Council (“FWEAUC”) is to take an active role in the adoption and implementation of effective wastewater legislation and regulations at the federal, state, and regional levels. The FWEAUC is also a forum where utility managers from around the state discuss the important issues facing our industry and help shape the direction for addressing these issues that best meet the needs of the 8 million citizens we serve. Our Member Utilities continuously receive waste products from customers in our communities and manufacture clean water for the environment and nutrients for agriculture.

As an organization, FWEAUC has cultivated a cooperative relationship with Senior Staff at the Florida Department of Environmental Protection (“FDEP”) and Water Management Districts (“WMD”). The FWEAUC has promoted environmental regulations that are strongly rooted in science and give utilities the flexibility to meet environmental objectives at the lowest cost for our customers.

The issues that the FWEAUC has been involved with include the continuation of Numeric Nutrient Criteria (“NNC”), incentivizing the use of reclaimed water through changes to F.A.C. 62-40, and incentivizing water conservation. New challenges that have emerged this year are Human Health-Based Criteria and the Mercury Total Maximum Daily Load (“TMDL”). This year’s efforts have been a combination of individual FWEAUC members leading and participating in the various efforts as well as legal and technical consultants that we have engaged with appropriate expertise.

Significant progress has just been completed on NNC. Last year, the FDEP proposed a more tailored and granular approach to setting numeric nutrient criteria for Florida’s water bodies as a substitute for the more general criteria proposed by the United States Environmental Protection Agency (“EPA”). In November of 2012, EPA approved the FDEP’s NNC in its entirety and without conditions. The FDEP and EPA agreed in March of 2013 on how the FDEP NNC would be implemented and how EPA’s original proposal would be withdrawn. The FWEAUC was an active participant in the discussion that preceded the agreement, advocating for provisions that would protect the environment in the most efficient way for 8,000,000 Floridians provided wastewater service by FWEAUC members.

The FWEAUC was actively engaged in influencing and supporting changes in FAC 62-40 that incentivize the expansion of reclaimed water systems to address water resource issues. In March of this year, there were administrative challenges to changes proposed to F.A.C. 62-40 by FDEP. FWEAUC participated in the administrative challenges to ensure that reclaimed water Incentivization was maintained.

The utility councils of both FWEA and FSAWWA are continuing to work cooperatively with FDEP to develop statewide water conservation policy through the Consumptive Use Permitting Consistency Initiative effort. First and foremost, any water conservation policy should incentivize conservation, specifically through extensions of a water supplier’s water use permit when the supplier can demonstrate reductions in demand resulting from conservation, and also can demonstrate future demand equal to or greater than the water saved through conservation. Additionally, water conservation policy should focus on water suppliers developing



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individual goal-based conservation programs and not establishing uniform, one-size-fits-all, prescriptive water conservation requirements. This year, FDEP is refining the rule language providing for permit extensions and goal-based water conservation. The utility work group will continue to work with the FDEP-WMD work group on these issues in the coming year.

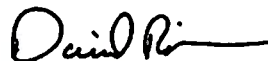
FWEAUC has been actively engaged in proposed human health-based criteria that are scheduled to be presented to the state Environmental Regulatory Committee on June 20, 2013. A workgroup has been established and has been very active in meeting with FDEP staff and providing verbal and written comment on the draft FDEP rule. Of particular concern to utilities are the proposed water quality criteria for disinfection byproducts. The health risk associated with extremely low ambient levels of these constituents has not been demonstrated. If the criteria are set at unreasonably low levels, they could prevent the use of chlorine for disinfection for facilities that have National Pollutant Discharge Elimination System (“NPDES”) permits, and in some cases, would not be met even if an alternative method were used for disinfection.

FDEP is developing a mercury TMDL to be applied statewide. Point sources are *de minimus* in comparison to atmospheric deposition. FWEAUC actively participated in the FDEP rulemaking to ensure that appropriate standards are set for surface water discharges from water reclamation facilities. FDEP revised its initially proposed mercury TMDL to address surface water discharge issues and submitted it to EPA for review; it is now awaiting EPA approval of the state TMDL.

We are pleased to have Dr. Kenneth Rubin present a talk on “Water Resources Utility of the Future” at our Annual Meeting on May 1, 2013 in Orlando. Dr. Rubin has provided engineering, economic, financial, and management consulting services to public and private clients worldwide. Dr. Rubin predicts that instead of current collection, treatment, and disposal practices the utility of the future will manage resources to generate value for the utility and its customers, improve environmental quality at least cost to the community, and contribute to the local economy.

It has been a pleasure serving as the FWEAUC President during the first year of my term and I look forward to another year of service. I want to thank the FWEAUC Board and Members for your active involvement. The successes that we have seen this year can be attributed to member involvement, the willingness of members to support positions that meet environmental objectives and customer needs, and the ability of the FWEAUC to speak with one voice on important policy issues. Thanks to all FWEAUC Members and Participants!

Best,



David Richardson, PE
President, FWEA Utility Council



Ocean Outfalls

This year's passing of SB 444 is the culmination of member efforts for over the past three years, and was signed into law on April 25, 2013. By way of history, on July 1, 2008, SB 1302, "Ocean Outfall Bill", was adopted into law and contained the objective to increase the use of reclaimed water to offset the use of traditional urban water supplies and thereby reducing the amount of nutrients entering the near shore waters of the southeast coast and in southeast Florida.

Only five southeast Florida utilities are impacted by this bill, however, over 30% of the state's total population is served by these utilities and thus impacted. The impacted utilities are: Miami-Dade Water & Sewer Department, City of Hollywood, Broward County, City of Boca Raton, and the South Central Regional Wastewater Treatment Facility (together, the "Southeast Florida Utilities").

The Southeast Florida Utilities have routinely conferred with the FWEAUC on this effort and specifically asked for FWEAUC support. During the 2013 legislative session, the FWEAUC supported the passing of SB 444 which clarifies certain statutory language and incorporates some common-sense provisions to substantially improve the cost/benefit of the rule as seen below:

- Section 1 amends s. 403.086, F.S., to allow utilities to comply with the 60% reuse requirement from their entire service areas or by contract with another utility within Miami-Dade, Broward, or Palm Beach counties rather than just from ocean outfalls by 2025. This provision will allow utilities the flexibility to pursue the most cost-effective method to achieve 60% reuse for their service areas. However, it may also reduce the percentage of reuse derived from ocean outfalls. The bill specifies that only facilities which shared a common ocean outfall as of July 1, 2008, are required to meet the 60% reuse requirement individually but may contract to share or transfer this responsibility with other utilities. FDEP must approve the apportionment of the reuse generated from the new or expanded reuse system for facilities that contract with another utility and the reuse apportioned to each utility's requirement may not exceed the total reuse generated by the new or expanded reuse system. A utility must provide FDEP a copy of any contract with another utility that reflects an agreement between the utilities regarding the apportionment of reuse.
- It allows utilities to continue backup discharges through ocean outfalls that are part of a functioning reuse system or other wastewater management system authorized by FDEP. Utilities may make backup discharges that:
 - Do not cumulatively exceed five percent of total baseline flows measured as a five-year rolling average;
 - Are subject to applicable secondary waste treatment and water-quality-based effluent limitations specified in department rules; and
 - Are deemed to meet AWT when in compliance with the effluent limitations.



Ocean Outfalls

- It defines “baseline flow” as “the annual average flow of domestic wastewater discharging through the facility’s ocean outfall, as determined by the department, using monitoring data available for calendar years 2003 through 2007.”
- It updates the requirements for the detailed plans that utilities must develop by July 1, 2013. The new information included in the plan must identify:
 - The technical, environmental and economic feasibility of various reuse options;
 - An analysis of costs necessary for utilities to meet state and local water quality criteria; and
 - A comparative cost estimate of achieving reuse requirements from ocean outfalls and other sources.
- The plan must evaluate the demand for reuse in the context of future regional water supply demands, the availability of traditional sources of water, the need for alternative water supplies, the offset reuse will have on potable supplies, and other factors contained in the South Florida Water Management District’s (“SFWMD”) Lower East Coast Regional Water Supply Plan. The plan is due to the department by July 1, 2013, with an update due by July 1, 2016.
- Finally, it requires the FDEP, the SFWMD and affected utilities to evaluate the detailed plans and recommend adjustments to the Legislature, if necessary, to the reuse requirements in this bill. The report is due to the Legislature by February 15, 2015.



Numeric Nutrient Criteria

On March 15, 2013, FDEP and EPA announced that they reached an agreement on Florida's nutrient water quality standards program. The two agencies outlined their agreement in a joint "Path Forward" memorandum, in which EPA commits to withdraw all of its federal nutrient criteria rulemakings, so long as the Florida Legislature passes legislation that does the following:

- Authorizes FDEP to adopt a guidance document, entitled "Implementation of Florida's Numeric Nutrient Standards," which in part explains the process for distinguishing between freshwater streams and the subset of flowing waters excluded from FDEP's numeric nutrient criteria rules (e.g. tidally influenced stream segments, managed storm water conveyances, agricultural irrigation canals, intermittent streams, etc.).
- Requires FDEP to manage nutrient loads from all canals, ditches, and other flowing waters to protect downstream receiving waters.
- Requires FDEP to complete its estuary and coastal waters nutrient criteria rulemakings by December 1, 2014. Until that rulemaking is complete, those unimpaired estuaries that lack FDEP adopted nutrient criteria will be managed to maintain current nutrient levels.
- Exempts from legislative ratification any FDEP numeric nutrient criteria rulemakings for estuaries during calendar year 2013.
- Codifies in Florida Statutes that when EPA withdrawals all of its numeric nutrient criteria rulemakings in Florida, the FDEP rule's effective date and non-severability clause shall expire.

The FWEAUC supports this nutrient criteria legislation, HB 7115/SB 1808, which has advanced quickly through the Florida Legislature. At the date of this Report, the bills are being considered on the House and Senate Floor.

Over the past four years, FWEAUC has worked with EPA and FDEP to bridge the gaps between the state and federal nutrient regulatory programs and to develop a science-based and economically responsible outcome. FWEAUC has participated in meetings with top EPA and FDEP officials, filed formal written comments, educated lawmakers, coordinated with aligned stakeholders, and as necessary, pursued legal actions against EPA's nutrient criteria rulemakings. The FWEAUC is gratified that these painstaking efforts have helped shape a state-federal reconciliation on one of the most significant water policy challenges ever to confront Florida's wastewater treatment community.

While the state-federal reconciliation is significant, FWEAUC members should keep in mind that the agencies' agreement is not itself the final resolution of the ongoing numeric nutrient criteria saga; rather, the agreement is a map for FDEP and EPA to follow to achieve resolution. FDEP must complete the additional nutrient criteria rulemakings required by HB 7115/SB 1808, and EPA will need to approve the new FDEP rules and the legislation as a change to water quality standards. These actions are all subject to potential legal challenges, and the environmental advocacy groups that prompted EPA's rulemakings via a 2008 federal lawsuit have already indicated their intentions to sue again. As these developments unfold, Florida's wastewater treatment community can count on the FWEAUC to continue its frontline advocacy for sound nutrient water quality criteria policy.



Mercury TMDL

A 1999 Consent Decree negotiated between EPA and several environmental groups required EPA to promulgate a mercury TMDL by 2012. To satisfy those requirements, FDEP began the development of a statewide mercury TMDL for Florida in 2008. The effort of developing the Florida mercury TMDL has been an extraordinarily involved undertaking for a number of reasons. The primary source of mercury contamination in Florida's waters is air deposition. However, the vast majority of air deposition impacting Florida's waters originates from out of state, and even international sources. Methylmercury is the form of mercury that is of concern in the food chain, but elemental mercury is only transformed to methylmercury under certain limited environmental conditions.

Throughout the process of setting a state mercury TMDL, both FDEP and the utility industry representatives agreed that point source discharges from domestic wastewater plants were a *de minimus* source of mercury (<0.1% of total mercury loading to Florida waters). However, the initial proposed FDEP mercury TMDL contained a mercury allocation for wastewater point sources that was both overly restrictive and arbitrarily calculated. FDEP and FWEAUC cooperatively developed a more representative allocation, as well as appropriate mercury minimization measures, for domestic point sources. The end result is a TMDL that assigns to domestic wastewater sources an appropriate level of responsibility given the minimal impact of the *de minimus* mercury contained in treated municipal effluent.

For the mercury TMDL, domestic plants greater than 1 mgd will be required to sample their effluent to determine if mercury is present. Plants that are found to have mercury present will be required to promote source control through the promulgation of mercury minimization Best Management Practices (BMPs) for dentists, hospitals and schools, which are the typical remaining sources in communities. Facilities less than 1 mgd and those larger facilities with no detectable effluent mercury are exempted from these BMP requirements. Under the terms of the currently proposed TMDL, no specific mercury reduction requirements (beyond issuing the BMPs) are anticipated for any domestic wastewater facilities.

The mercury TMDL has now been proposed by FDEP. A ratification bill is being routed in the 2013 state legislative session, with passage expected. EPA approval of the mercury TMDL is currently expected after state ratification. It is not uncommon for legal challenges by third parties to be reserved for the Federal level.



2013 Legislative Session

While the 2013 Legislative Session has not yet concluded, it is shaping up to be another very successful year for Florida's domestic wastewater treatment community (Knock on wood!). Most notably, the Florida Legislature is poised to pass legislation, SB 1808/HB 7115, embodying the FDEP/EPA reconciliation on numeric nutrient criteria. This legislation requires FDEP to adopt numeric nutrient criteria for remaining estuaries and coastal waters by December 1, 2014 and sets the interim criteria for these waters as their unimpaired condition. The legislation also requires FDEP to manage nutrient loads to protect downstream waters, and it authorizes FDEP's nutrient rules to take effect once EPA stops its nutrient criteria rulemakings.

Another bill of significant interest to many of Florida's southeast utilities, SB 444, has already passed the Legislature and been signed into law by Governor Scott. SB 444 amends the 2008 ocean outfalls legislation that required wastewater utilities in southeast Florida with ocean discharges to enhance treatment and meet specified reuse of reclaimed water requirements. Specifically, SB 444 allows utilities additional flexibility to meet the original 60% reuse requirement and to continue to discharge peak flows up to five percent of utilities' baseline flows, through ocean outfalls.

The Florida Legislature is also considering several other bills whose passage would likely benefit FWEAUC members:

- CS/CS/HB 713 allows water quality credit trading programs to be established for individual impaired water bodies throughout Florida and thereby builds on the water quality credit trading pilot program in the Lower St. Johns River Basin.
- CS/SB 364 directs that alternative water supply development projects are eligible for consumptive use permits of at least 30 years.
- HB 7157 ratifies specified FDEP rules implementing total maximum daily loads for impaired water bodies, including the statewide mercury TMDL and the nutrient TMDL for North Escambia Bay.
- CS/SB 948 improves predictability of the water supply planning process with respect to agriculture demands by enhancing participation of the Florida Department of Agriculture and Consumer Services and water self-suppliers in the water supply planning process.

As in prior years, the FWEAUC has been an active participant in the Florida legislative process, educating members on the importance of Florida's domestic wastewater utility sector and the need for science-based and economically prudent environmental policies.



Reclaimed Water Workgroup

In January 2009, representatives of FDEP, the water management districts, the FWEAUC, Florida League of Cities, individual local government utilities, and environmental consulting firms convened in Orlando to discuss how state regulatory policies could better optimize the reuse of reclaimed water. This initial meeting kicked off a three-year long Reclaimed Water Policy Workgroup ("Workgroup") stakeholder process which concluded in May 2012 with the issuance of a final report.

The Workgroup focused on building consensus-based policies designed to optimize the use and continued development of reclaimed water as an alternative water supply.

The 2012 Florida Legislature passed legislation incorporating the Workgroup's recommended revisions to the scope of water management district authority over reclaimed water. See HB 639 (2012). This legislation also included prior Workgroup recommendations to incentivize the use of reclaimed water through the use of impact offsets and substitution credits. "Impact offsets" are the use of reclaimed water to reduce or eliminate a harmful impact that has occurred or would otherwise occur as a result of other groundwater or surface water withdrawals. "Substitution credits" are the use of reclaimed water to replace part or all of an existing permitted use of resource-limited groundwater or surface water, allowing a different user (or use) to increase its withdrawal from the same resource-limited groundwater or surface water source provided that the withdrawal creates no net adverse impact on the limited water resource or creates a net positive impact.

FDEP proposed changes to Rule 62-40, F.A.C., in December 2012 that included the initiatives developed by the Workgroup and adopted by the Florida Legislature in HB 639. The FWEAUC was actively engaged in influencing and supporting changes in Rule 62-40 that incentivize the expansion of reclaimed water systems to address water resource issues. In March of 2013, administrative challenges were filed against some of FDEP's proposed amendments to Rule 62-40. The FWEAUC intervened in the administrative proceedings to ensure that the rule maintained its reclaimed water incentivization policies. A settlement was reached with all parties that included impact offsets and substitution credits. FDEP subsequently adopted the agreed upon changes to Rule 62-40, which will become effective when the Florida Legislative Session concludes on May 3rd of this year.

Later this year, FDEP will consider additional changes to FAC 62-40 that will address the Workgroup's recommendations on the use of groundwater or surface water to supplement reclaimed water systems.



NACWA Coordination

The FWEAUC maintains a relationship with the National Association of Clean Water Agencies ("NACWA"), a group that is a recognized leader in environmental policy and viewed as a key stakeholder in both the federal legislative and regulatory arenas. NACWA has established credible, collaborative relationships with members of Congress, Presidential administrations and the EPA, that have benefited groups such as the FWEAUC. Brian Wheeler/TOHO Water Authority has been serving as the FWEAUC's NACWA liaison. Suzanne Goss/JEA serves as the NACWA President this year and will serve as liaison for the year.

NACWA has several key areas of focus, all of which touch our members in many ways:

- Affordability Integrated Planning and Funding – encouraging flexibility and innovation as critical components to meet the goals of the Clean Water Act in a sustainable manner. NACWA's Money Matter's campaign has highlighted involvement in several congressional initiatives including the Water Quality Improvement & Investment Prioritization Act, The Clean Water Affordability Act of 2012, and the Water Quality Protection & Job Creation Act which includes the Water Infrastructure Financing Innovations Authority ("WIFIA").
- Energy Recovery and the Water Resources Utility of the Future – NACWA, in partnership with the Water Environment Federation and the Water Environment Research Foundation, developed *The Water Resources Utility of the Future: A Blueprint for Action* to support the exploration and evolution of public utilities through defining relevant issues, research and analyze key data, and offer recommendations for critical actions for the future. NACWA released the Blueprint for Action at its winter conference held in Miami in February.
- Nutrients, Nonpoint Source Control & Watershed Management – NACWA has participated in litigation and regulation promulgation related to imposition of numeric nutrient criteria in Florida and across the country. NACWA supported the FWEAUC in its efforts associated with state's nutrient litigation. Other associated nutrient efforts include opposing the NRDC petition seeking nutrient removal at all treatment facilities, developing a Water Quality Trading Working Group and participation in the Healthy Water Coalition to focus on strengthening the link between agricultural land and water quality.

NACWA continues to be a partner in supporting the FWEAUC's legal effort in opposing EPA's numeric nutrient criteria rule. Their engagement in the Florida case has increased the awareness of nutrient issues nationally.

The FWEAUC receives NACWA's Clean Water Exchange (and Action Alerts) at no cost. This communication tool, designed to keep members of state & regional clean water organizations informed of critical national issues, provides opportunities for our members to stay engaged and to have their voice heard in Washington, DC.

A decorative header consisting of six vertical rectangular panels, each filled with a pattern of small, light blue water droplets. The title "Water Conservation" is centered across these panels in a large, bold, black sans-serif font.

Water Conservation

As traditional potable groundwater resources are becoming limited in the State of Florida, Water Conservation will become a key Alternative Water Supply strategy used to avoid the developing significantly more expensive alternative water resources. For more than ten years the FWEAUC has partnered with the Florida Section of the American Water Works Association Utility Council (“FSAWWAUC”) to develop and promote Guiding Principles for developing water conservation policy at either the water management district or state level. In September 2010, FSAWWAUC adopted and the FWEAUC endorsed a set of eight Guiding Principles for Establishing State Water Conservation Policy.

In 2012 the FDEP initiated efforts to draft and implement a statewide water conservation rule as part of the agency's Consumptive Use Permit Consistency (“CUPcon”) initiative. To assist in the rule development FDEP commissioned a water conservation work group consisting of representatives from the agency and each of the five water management districts. A joint utility work group was also developed composed of representatives from both the FSAWWAUC and the FWEAUC to work with and provide feedback to the FDEP CUPcon work group. The joint utility work group met routinely throughout the year primarily via conference calls developing consensus comments and recommendations to the CUPcon work group. The FDEP CUPcon work group has welcomed the input of the joint utility work group and adopted a number of the utility suggestions and comments in the course of drafting a water conservation rule.

Recently FDEP issued its final draft of the proposed water conservation rule to begin rule workshops within each of the five water management districts beginning in May and continuing into the summer. The present draft of the proposed rule includes several key elements which the joint utility work group, FSAWWAUC and the FWEAUC have advocated for the past several years in conjunction with the Guiding Principles. Two of the most significant beneficial elements of the draft rule are:

- Conservation Incentive – A utility could obtain an extension of its CUP as a result of demonstrated reduction in water use demand through conservation.
- Goal Based Conservation – A utility can develop and adopt a specific goal based water conservation plan designed to meet its unique specific customer base.

The joint utility work group will continue to engage the FDEP CUPcon work group and the Water Management Districts as the water conservation rule proceeds through the rule making stages. The joint work group and both utility councils will still seek to continue to improve the rule to improve the use of water conservation as a key alternative water supply strategy.



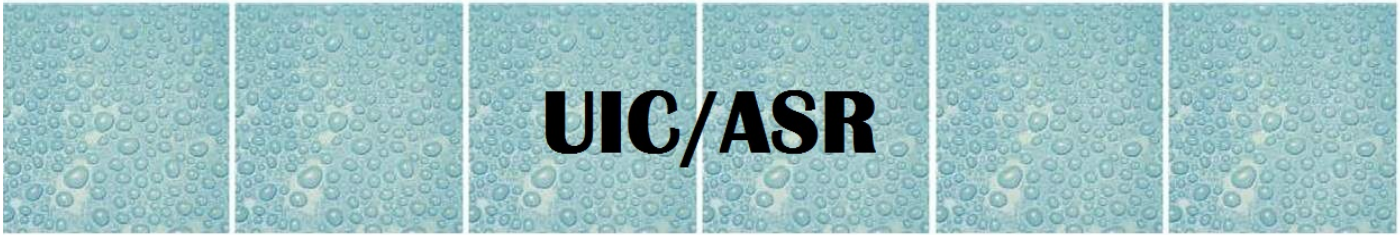
Human Health-Based Criteria

As part of its latest triennial review effort, FDEP initiated rulemaking to update its Human Health Based (“HHC”) water quality criteria. These criteria include compounds such as trihalomethanes, metals and pesticides to which the public is presumed to be exposed by consuming fish living in waters contaminated with the various chemicals and compounds. Ambient criteria are set at levels that are considered safe to humans notwithstanding bioaccumulation and bioconcentration of contaminants in the fish tissue.

DEP’s past attempts to update its HHC were met with significant concern and comment from the regulated community including wastewater utilities, electric utilities and the pulp and paper industry. However, citing numerous failed past attempts to update Florida’s HHC, environmental organizations petitioned EPA to step in and set criteria for the State of Florida. FDEP accelerated its efforts to avoid unwarranted federal intervention moving away from simple mechanistic models used in past efforts and adopting a probabilistic approach applying Monte Carlo analyses to distributions of data rather than adopting a single number for variables such as weight of the individual fish consumer and the fish consumption rate. A probabilistic approach is generally favored over simple mechanistic models because it minimizes the compound conservatism inherent to a mechanistic approach.

The draft criteria initially proposed by FDEP were extremely stringent with many of the proposed criteria falling well below minimum detection limits. The FWEAUC formed an HHC Workgroup to assess the FDEP’s criteria and to work with FDEP to address member concerns. The FWEAUC provided detailed comment letters to the FDEP detailing technical, legal and policy concerns. Specifically, FWEAUC was concerned with FDEP’s criteria for trihalomethanes (which are byproducts of wastewater disinfection) and an organic compound called DEHP which is present in food and bottled water at concentrations orders of magnitude greater than FDEP’s proposed criteria. After meeting with the FWEAUC’s HHC Workgroup, FDEP agreed not to propose a DEHP criterion pending further study. FDEP also recalculated its criteria, including its trihalomethane criteria, using an updated set of fish consumption data and adjusting its methodology to be consistent with a recent shift in EPA policy as to how fish consumption is assessed.

The FDEP’s latest proposed HHC are still extremely stringent and the methodology imposed upon the State by EPA is rife with technical deficiencies. However, FWEAUC members do not find most of the 87 parameters for which FDEP has proposed criteria in their effluent. For those compounds that are detected in facility discharges, the FWEAUC does not anticipate that exceedances of any regulatory significance will be attributed to member wastewater facilities. As currently proposed, and at current detection levels, the FWEAUC does not believe that it is necessary to oppose FDEP’s adoption of its HHC. Approval of the proposed criteria by the Florida Environmental Regulation Commission is pending with final action to approve or disapprove expected to occur on June 20, 2013.



Water storage is critical to water resource management within Florida. While surface storage in ponds or lakes, and storage tanks are all means of storing water, there are many situations in which they are not feasible. Further, the construction and operating costs of these surface storage or storage tanks can be prohibitive. Aquifer Storage and Recovery (“ASR”) involves recharging an aquifer with water and then recovering that water for later use. ASR provides a cost effective, flexible option for water storage.

Arsenic occurs naturally in Florida’s underground rock formations. Arsenic can be released when water is recharged into underlying aquifers. This arsenic release has proven to be a regulatory barrier that may curtail further use of ASR. The FDEP staff understands the issue and its significance and continues to explore options to resolve this issue while protecting public safety. The FWEAUC continues to work with EPA and FDEP to identify permitting strategies that protect public health and safety while making ASR a viable alternative.



Notes



Notes

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