Protect Sanctuary Waters: Finish the Wastewater Job Shallow Wells

Jan M. Edelstein
Water Quality Protection Program
November 13, 2019
(Rev. 11.16.2019)

Goal: Eliminate Discharges of Pollutants remaining in AWT Treated Wastewater to Outstanding Florida Waters

DID YOU KNOW?

Discharges from shallow wells to Sanctuary waters are NOT monitored.

ROLE FOR WATER QUALITY PROTECTION PROGRAM

- 1. Ask DEP questions
- 2. Get answers
- 3. Design shallow well discharge monitoring program
- 4. Implement pilot shallow well monitoring program

How many Gallons/Day of Treated Wastewater Goes Down Shallow Wells as the primary disposal method?



Not Shown

- Marathon
- KWRU/Stock
 Island

How many Gallons/Day of Treated Wastewater Goes Down Shallow Wells DEP CAN EASILY PROVIDE THE ANSWERS

Location	Max Monthly Capacity	Permitted Average Daily	2019 Three Month Actual Flow
Marathon	1.?? mgd	1.8 (??) mgd.	
Cudjoe*, **	1.18 mgd	.94 mgd	
KWRU		.998 mgd	
Bay Point	Under 100,000		
Big Coppitt			
Boca Chica			
Key Haven, etc.			
TOTAL:			

^{*}Cudjoe Shallow Wells currently permitted for Primary Disposal

^{**} How many gallons go down Shallow Wells when used as "back-up"?

What Does That Mean? – How Much Nitrogen and Phosphorous per year goes into Sanctuary Waters?

DEP CAN EASILY PROVIDE THE ANSWERS

Location	Total Nitrogen (Pounds) Per Year	Total Phosphorous (Pounds) Per Year
	Permitted/Actual	Permitted/Actual
Marathon		
Cudjoe	8,584 lbs.* / ??	2,861 lbs.**/??
KWRU		
Bay Point		
Big Coppitt		
Boca Chica		
Key Haven, etc.		
TOTAL:		

```
*0.94 mgd (permitted AADF)

x 3 mg/l (permitted nitrogen average)

x 8.34

x 365 days=

8584.362 pounds of nitrogen per year.
```

```
**0.94 mgd (permitted AADF)
x 1 mg/l (permitted phosphorous average)
x 8.34
x 365 days=
    2,861 pounds of nitrogen per year.
```

CAVEAT: Information should be provided by DEP. Advised by Prof. Engineer that this is consistent with their method of calculating.

But What Is The Problem? The Wastewater Is Treated To Drinking Water Standards?

Sanctuary Waters are Polluted with very low levels of nutrients

Pollutant	Drinking Water Standard	AWT Standard	Keys Surface Water Standard (Cudjoe area)
Total Nitrogen	10.00 mg/L	3.00 mg/L	0.25 mg/L
Total Phosphorous	Unlimited	1.00 mg/L	0.009 mg/L
Compounds: Pharmaceuticals, Personal Care Product	Not yet regulated	Not yet regulated	Mutagenic - None shall be present

But What Is The Problem? The Wastewater Is Treated To Drinking Water Standards.



A dramatic effect of endocrine disruptors that occur in water is their ability to disrupt endocrine-mediated processes, such as reproduction, including sex determination and development of sexual characteristics. The three female mosquito fish (*Gambusia affinis*) have been "masculinized" and have developed an elongated anal fin (i.e., gonopodium) (vellow arrow) that is an organ normally used by

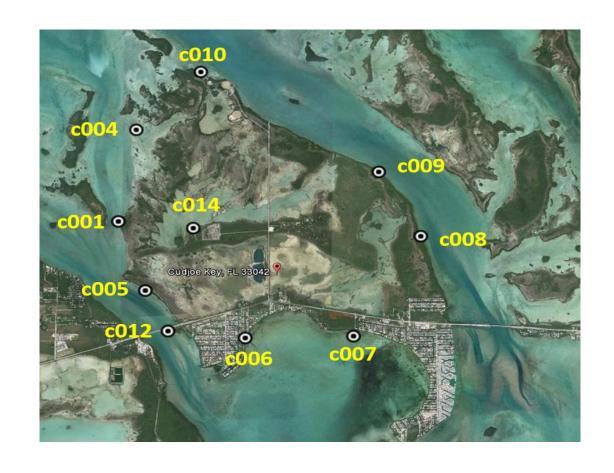
EPA is beginning to study Contaminants of Emerging Concern, which are not removed by AWT methods.

- Pharmaceuticals, including hormones
- Personal Care products

Tropical Connections, Page 107

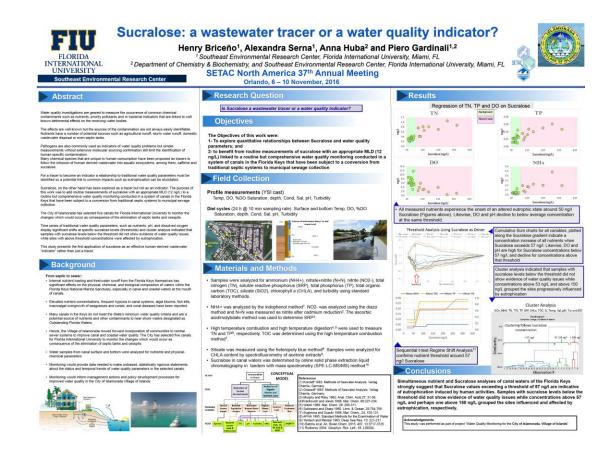
Design a Surface Water Monitoring Program for Shallow Well Injection

1. Select sampling locations based on geologic assessment of area surrounding the WWTP shallow wells. Identify sink holes, etc. which could indicate expedited pathways.



Design a Surface Water Monitoring Program for Shallow Well Injection

- 2. Monitor for nutrients, other pollutants of concern and salinity.
- 3. Monitor for Sucralose to distinguish shallow well pollution from 'mainland wash down' pollution.



Pilot Test a Monitoring Program for Shallow Well Injection

Marathon??

New canal monitoring and nearshore monitoring efforts should identify and collect water quality data in vicinity of shallow well injection.

Show DEP It can and Should be Done by all Operators of Shallow Wells used for Wastewater Disposal to protect Sanctuary Waters.

DEP has the regulatory authority to require monitoring under its rules.

In addition, an NPDES permit with monitoring might be required in the future, pending the outcome of <u>County of Maui v. Hawai'l Wildlife Fund [heard Nov 6 by US Supreme Court]</u>. (In Maui, dye tracer study proved shallow well injection of WWTP was polluting nearby ocean area; Maui claimed no NPDES permit required because discharge was "indirect" because pollutants do not flow directly into ocean but go through groundwater. ""At bottom, this case is about preventing the county from doing indirectly that which it cannot do directly," <u>the Ninth Circuit ruled</u>, and required NPDES permit. Maui appealed.)