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Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0870

RE: Notice of Application
Initial Wastewater Certificate
For Resort Village Utility, Inc.

During the past several months, a number of Resort Village scopes have been presented in various public forums for information. I have had the opportunity to review the information in some detail and have listened at length to explanations offered by the developer, i.e., Mr. Ben Johnson. All of the proposals fall considerably short of complementing the status quo established by the 1977 DRI. A major failing has to do with the discharge of treated wastewater from the treatment facility.

Over the past several years, wastewater discharge has received priority attention from the appropriate environmental protection and regulatory agencies. This has been especially true in Franklin County due to the need to preserve the water quality of Apalachicola Bay. The concerns about wastewater making its way into the Bay have significantly impacted even wastewater handling at private residences. This is highlighted by the requirement for aerobic treatment systems and/or other high level equivalents for all single family residences constructed on St. George Island commencing January 1, 1993. It seems to be obviously incongruous to believe that measures like this are complemented by construction of a waste treatment facility for a village of very substantive population and allow the discharge of effluent from same where it will automatically and continuously make its way into the Bay.

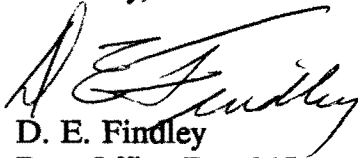
Recent precedents, including the disallowance of occasional run-off from a proposed golf course at Green Point into the Bay, serve to highlight a need for protection and prevention which precludes even incidental intrusion of wastewater into the Bay. In the case of Green Point, run-off into the Bay would only occur at times of excessive rainfall. The point of entrance into the Bay for Green Point provided for maximum mixing due to both tidal and wind action. The extensive area proposed for wastewater discharge for Resort Village waters into Apalachicola Bay occurs where such mixing does not readily take place. The discharge does occur very close to and/or adjacent to Nick's Hole, a primary estuary which nurtures the total Bay. This information is readily available to anyone familiar with the ecological studies previously conducted.

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It should be noted that industry throughout the State of Florida is under considerable pressure to use best available technology to assure that industrial discharge will satisfy drinking water standards. A very straightforward approach to permitting developments such as Resort Village would be to require a zero effluent discharge. The waste treatment plant would become the potable water supply facility for the Village. Incremental make-up water for the Village could be purchased from the public utility.

There are a host of other examples that can be sighted which confirm established precedents for denying the discharge of wastewater into or in close proximity to Apalachicola Bay. I, therefore, ask that you examine all the facts, recognize that prior actions have preserved the Bay to date, and that good judgment and prudence would dictate denial of the application.

Sincerely,



D. E. Findley
Post Office Box 945
Eastpoint, FL 32328

DEF/gf

cc: Resort Village Utility, Inc.
1234 Timberlane Road
Tallahassee, FL 32312