

**Antonia Hover**

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**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Monday, January 27, 2025 10:04 AM  
**To:** 'jody furch'  
**Cc:** Consumer Contact  
**Subject:** RE: Docket 20240032-SU

Good Morning, Joseph Furch.

We will be placing your comments below in consumer correspondence in Docket No. 20240032, and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you!

*Toni Hover*

*Commission Deputy Clerk I  
Florida Public Service Commission  
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**From:** jody furch <jody.furch@gmail.com>  
**Sent:** Monday, January 27, 2025 9:59 AM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Cc:** Michele Barnes <lgipreservationalliance@gmail.com>; Terrie Weibley <tweibley1@gmail.com>; Jody Furch <gasparshoavicepres@gmail.com>  
**Subject:** Docket 20240032-SU

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**Docket # 20240032-SU**

**Subject;**

**PSC hearing on Environmental Utilities, LLC request to obtain a certificate to provide waste water service to customers of the barrier Islands Little Gasparilla Island, Don Pedro Island, and Knight Island**

January 27, 2025

Dear Commissioners

I am a resident of Little Gasparilla Island and I am unable to attend your hearing on Environmental Utilities, LLC's (EU) request for approval to provide waste water services to barrier islands because of a scheduling conflict, but I wanted to inform you I am strongly **opposed** to granting them the certificate. I believe the process has not been handled properly, and their proposed system may not yield the results we all desire, improved water quality. It offers additional liabilities as others have stated, but will no doubt have a terrible financial impact on Little Gasparilla Island owners.

The impact of an island wide removal of every existing system and replacing it with new tanks, pumps, etc , plus building out the required other infrastructure such as piping thru the roads, easements, and private property needs to be considered as the last option.

### **The much referenced Lapointe Study**

There is no doubt the Lapointe study is established science and the author Dr. Lapointe makes the undeniable case sewage pollution is the primary cause of water quality degradation and harmful algae blooms (HAB's) in Lemon Bay, Gasparilla Sound, and Charlotte Harbor. It is also responsible for high levels of bacteria and pose a health issue.

Dr. Lapointe concludes the relatively high water table, old systems, often too low elevation of leach fields above water table, and flood events, etc are responsible for the contamination. He references the current US EPA requirement of a minimum 2 to 5 ft septic leach field height above water table to function properly. No doubt many old systems may not reach that requirement.

Interestingly enough, Charlotte County does not consider the leach field presence (or absence), or in any condition as an indicator of septic system failure. This is a major oversight. If we are going to use science to justify removing septic systems lets use ALL of the science to analyze and solve the problem. Leach fields DO matter!

Dr. Lapointe concludes that a better option for the barrier islands sewage disposal is to pump it to a centralized system on the mainland. He does not discuss or endorse EU's specific proposal but EU is using him to champion the reason for central sewer.

While I fully agree with Dr. Lapointe that failed septic systems are the primary culprit I **do not support** the EU proposal. I think it is an inferior system as many have addressed, puts an unfair financial burden on owners to purchase, install, and operate, places a severe environmental impact on the island to install, etc. and is unproven as the right option for LGI. IMO it

is Charlotte county's attempt to wash its hands to move on from its responsibility as quick as possible and EU offers that opportunity.

After reading his paper multiple times I was especially struck though that Dr. Lapointe makes a case for ATU systems without mentioning them.

### **Some Background; in the weeds of the science**

Ammonia is the primary cause of eutrophication and the common method for its removal from both individual septic and centralized sewer systems is employing a 2 step microbial assisted digestion to convert it to inert nitrogen. Solids are also digested in the process.

In the first step microbes use oxygen from air to convert ammonia to nitrate then a different microorganism converts the resulting nitrate to inert nitrogen gas. The first step is absolutely important for the process to go forward.

In conventional septic systems the primary tank's environment is very limited in oxygen (anaerobic) due to many competing processes and the first step is slow, but as the effluent slowly moves thru the system and finally into the leach field the ammonia is converted. If the system is operated beyond design parameters (too much material too fast ) or the depth of leach field above water table is too shallow there might not be enough time to complete the process before the pollutants percolate into the environment. As stated the EPA required a 2-5 ft leach field elevation above water table.

Unlike conventional septic systems the central sewer facility employs an aeration step to speed up the process. The infrastructure required to move the sewage to such a facility is expensive and has its own risks. My understanding is EU's low pressure proposal is the riskiest.

Incidentally, even the central sewer facility that will receive the waste does not remove pharmaceuticals and other impurities so there is no advantage over septic systems in that respect.

### **Why an ATU System**

An important obvious question is, can you improve conventional septic system's performance by introducing an aeration step? If so, you are essentially accomplishing the central mainland secondary septic treatment operation the site of waste origination. You still require the leach field elevation to conform to US EPA requirements of 2-5 ft above water table to be fully effective. What if you also require regular inspections to insure the system is working properly? Well, this is by definition an LGI ATU system.

## **ATU vs central sewer**

Rather than disposing of everything without consideration of impact and down a pipe to never be seen again (perhaps?) each ATU is under the care of the individual homeowner who is required to insure proper operation, pass yearly inspections, make repairs when needed, and system issues, performance, and failures are reported to the County Health Department and need to be addressed to avoid penalty.

Our ATU is well cared for. We are conscious to what we add to it, and it easily passes a thorough inspection 2x per year. As mentioned we are required to have a service contract (ours is with Martin Septic Co at \$500/year = \$42/month) and a report is sent to Charlotte county health department. Failures are reported and are required to be addressed immediately.

Our ATU leach field is greater than 2 ft and in fact at least 3 - 4 ft or more above the water table, exceeding the US EPA requirement.

Our negligence on its use also impacts us because poor care is expensive.

Let's empower individuals to be stewards of their own actions, aware of their disposal and its impact on the environment and pocket book.

## **A flawed process that needs to be addressed.**

Before any system is even considered for LGI (central sewer or Septic) though, the Charlotte County health department **must undertake** a survey to determine what is currently present on island in order to establish a baseline and a need for island wide change. I am confident this has never been done. It must be done if it hasn't.

This survey will determine what currently is in use on the island. For example how many ATU's, other systems, the age of each system and height of established leach fields, extent of use (number of individuals, part time vs full time), and extent of renting, etc. Without such a survey the county has no way to solve the problem without knowing what the problem is, what is needed, or what is available to work with.

The flawed process is even considering the proposal to destroy every LGI septic system, even those working properly yet at same time imposing financial burden on owners without a survey to determine need.

Especially agreeing to any proposal to replace every septic system even those that are functioning properly will never garner any support without first understanding the extent of the need.

## **Grants, a necessary piece.**

Finally once it is determined the extent and number of systems that should to be upgraded or replaced the next step is to absolutely secure grants for homeowners who are impacted. Florida water quality improvement grants via FDEP may still be available to individual owners who need help in this regard (to repair septic systems ) but not to private companies like EU. Maybe other help is available to individual homeowners...let's find them!

## **Conclusion**

Without a doubt pollution from failed septic systems is contributing to water quality deterioration in lemon bay, etc and failed systems need to be identified and replaced and grants need to be obtained to avoid financial burdens on affected homeowners.

Charlotte County must undertake a comprehensive survey to identify the degree of the need on LGI before any decisions are made as per next step.

Existing modern systems (conventional and ATU) with elevated leach fields and properly cared for should be considered as a viable alternative to EU's proposal instead of being destroyed and replaced with an expensive different system that may not be as good.

Rather than accept the current unproven and risky EU's low pressure proposal because it offers an opportunity to "do something." if replacement of only a few systems is warranted then perhaps individual ATU systems present a better option for homeowners. They are safer (less risk of spills, etc) and less expensive to operate (\$42/month compared to EU's estimates at \$220/month)

More work is obviously needs to be done, but whatever the result granting the certificate to EU a private company is the wrong choice.

Thank you

Joseph Augustus Furch III  
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