



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor
Alexis A. Lambert
Secretary

Sent Via Electronic Mail

May 13, 2025

In the Matter of an Application for Permit by:

City of Marco Island
Jeffrey Poteet
General Manager of Water and Sewer
50 Bald Eagle Drive
Marco Island, Florida 34145
JPoteet@CityofMarcoIsland.com

UIC Permit: 0280170-011-UO/1X
WACS Facility ID: 73754
County: Collier
Class I Injection Well System, IW-1
Operation Permit
Marco Island Reclaimed Water Production Facility

Notice of Permit

Enclosed is permit number 0280170-011-UO/1X for a Class I injection well system.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, (F.S.), by the filing of a Notice of Appeal pursuant to Rules 9.110 and 9.190, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, Agency_Clerk@FloridaDEP.gov; and by filing a copy of the Notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Permittee: City of Marco Island
Jeffrey Poteet, General Manager of Water and Sewer Department
Marco Island Reclaimed Water Production Facility

UIC Permit: 0280170-011-UO/1X
WACS Facility ID: 73754
Date: May 13, 2025

Executing and Clerking:

Executed in Tallahassee, Florida.
State of Florida Department of Environmental Protection

Richard Lobinske

Richard Lobinske, Ph.D.
Environmental Administrator
Aquifer Protection Program
Division of Water Resource Management

Certificate of Service

The undersigned duly designated clerk hereby certifies that this **Notice of Permit** and all copies were sent on the filing date **May 13, 2025**, to the following listed persons:

- Richard Lobinske, DEP/TLH, Richard.Lobinske@FloridaDEP.gov
- James Dodson, DEP/TLH, James.Dodson@FloridaDEP.gov
- Edith Chuy, DEP/TLH, Edith.Chuy@FloridaDEP.gov
- Cheryl Greenwell, DEP/TLH, Cheryl.Greenwell@FloridaDEP.gov
- Gabriele Starrach, DEP/SD Gabriele.Starrach@FloridaDEP.gov
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- Matthew Van Patten, PE, Apex Companies, LLC, Matt.VanPatten@ApexCos.com
- Rommy Lahera, Water Science Associates, Rommy@WSAConsult.com
- Kirk Martin, PG, Water Science Associates, Kirk@WSAConsult.com
- Jason Meadows, USEPA/ATL, Meadows.JasonB@EPA.gov

Filing and Acknowledgment

Filed, on this date, pursuant to Section.120.52, Florida Statutes, (F.S.), with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

5/13/2025

Date



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

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Underground Injection Control Class I Injection Well System Operation Permit

Permittee

City of Marco Island
Jeffrey Poteet
General Manager of Water and Sewer Department
50 Bald Eagle Drive
Marco Island, Florida 34145
JPoteet@CityofMarcoIsland.com

Permit/Certification

UIC Permit Number: 0280170-011-UO/1X
WACS Facility ID: 73754
Date of Issuance: May 13, 2025
Date of Expiration: May 13, 2030
Permit Processor: James Dodson

Facility

Marco Island Reclaimed Water Production Facility
807 East Elkcam Circle
Marco Island, Florida 34145

Location

County: Collier
Latitude: 25° 57' 33.94" N
Longitude: 81° 43' 23.38" W

Project: Class I Injection Well System IW-1

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and the rules adopted thereunder, particularly Chapter 62-528, Florida Administrative Code (F.A.C.). The above-named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department or DEP) and made a part hereof and specifically described as follows.

To Operate: One non-hazardous Class I injection well (IW-1) and associated monitor well (DZMW-1) for the disposal of reverse osmosis concentrate from the Marco Island South Water Treatment Plant and secondary treated municipal effluent from the Marco Island Reclaimed Water Production Facility. The maximum injection rate for IW-1 shall be 5,400 gallons per minute (gpm) and the maximum injection volume for IW-1 shall be 7.78 million gallons per day (mgd). The injection well is constructed with a 24-inch diameter steel casing set to 2,640 feet below land surface (bls), a 16-inch diameter stainless steel tubing set to 2,581 feet bls with a cemented annulus, and total depth of 3,340 feet bls. The dual-zone monitor well DZMW-1 is completed in the Suwannee Limestone from 1,000 to 1,089 feet bls and the Avon Park Formation from 1,490 to 1,600 feet bls.

In Accordance With: The Application to Operate DEP Form No. 62-528.900(1) received Mar 15, 2023, response to the Department's request for additional information dated August 8, 2024, and supporting information submitted to the Aquifer Protection Program (APP) Tallahassee office.

Permittee: City of Marco Island
 Jeffrey Poteet, General Manager of Water and Sewer Department
 Marco Island Reclaimed Water Production Facility

UIC Permit: 0280170-011-UO/1X
WACS Facility ID: 73754
Date: May 13, 2025

Location: Marco Island Reclaimed Water Production Facility, 807 East Elkcam Circle, Marco Island, Florida 34145, in Collier County.

The injection and monitor wells, as designated below by well name and Water Assurance Compliance System (WACS) Testsite identification (ID), and construction details at this facility, are as follows:

Table 1
Injection Wells

Well Name	WACS Testsite ID	Well Depth (Feet bls)	Casing Size ^a (Inches)	Casing Thickness (Inches)	Casing or Tubing Type	Casing Depth or Interval (Feet bls)
IW-1	4060	3,340	44	0.375	Steel	230
			39	0.375	Steel	400
			34	0.375	Steel	910
			24	0.5	Steel	2,640
			16	0.312	Duplex Steel	2,581
					Open Hole	2,640 – 3,340
Additional Injection Wells at this Site						
IW-2 0280170-010-UO/1X	13382	3,225	48	0.375	Steel	399
			36	0.375	Steel	900
			24	0.5	Steel	2,638
			15.8	0.66	FRP	2,629
					Open Hole	2,638-3,225

Injection Well Notes: All casing and tubing were cemented to land surface. ^aAll sizes in outside diameter or nominal size. ^bFiberglass reinforced plastic tubing

Table 2
Monitor Well

Well Name	WACS Testsite ID	Monitor Zone	Casing Size ^a (Inches)	Casing Thickness (Inches)	Casing Type	Casing Depth (Feet bls)	Monitoring Depth (Feet bls)
DZMW-1	7784A*	Upper Zone	24	0.375	Steel	395	1,000 – 1,089
			16	0.5	Steel	1,000	
	7784B	Lower Zone	6.625	0.3	FRP ^b	1,490	

Monitor Well Notes: All casings were cemented to land surface, except the 6.625-inch FRP casing which has an uncemented zone for monitoring. ^aOutside diameter. ^bFiberglass-reinforced plastic tubing. *7784A is the compliance point.

Subject To: Specific Conditions I-VI and General Conditions 1-24.

Specific Conditions

I. Operating Requirements

A. General

1. Only non-hazardous injectate as described in this permit and purge water from the on-site monitor wells (associated with the injection well system) may be discharged into the injection wells. *[62-528.400(1), F.A.C.]*
2. The injection pressure at the wellhead shall be monitored and controlled at all times to ensure the maximum pressure at the wellhead does not exceed two-thirds of the most recent tested pressure on the final casing, final cemented tubing, or casing/tubing annular space, as applicable. The following table outlines the wellhead pressures in pounds per square inch (psi) applicable at the time of permit issuance:

Well	Maximum Permitted Wellhead Pressure (psi)	Most Recent Tested Wellhead Pressure at the Time of Permit Issuance (psi)
IW-1	115	173

At such time as the next pressure test is performed and a report for that test is submitted to and accepted by the Department, the maximum wellhead pressure allowable will become two-thirds of the tested pressure from the successive test. *[62-528.300(6)(e), F.A.C.]*

3. The flow to the injection wells at each wellhead shall be monitored and controlled at all times to ensure the maximum fluid velocity down the well during operation does not exceed the respective flow rate indicated below, and shall not exceed 10 feet per second except during planned testing, maintenance, or emergency conditions in which case the flow rate shall not exceed 12 feet per second *[62-528.415(1)(f), F.A.C.]*:

Well	Peak Flow Rate (gpm)	Maximum Injection Volume (mgd)
IW-1	5,400	7.78

4. No underground injection is allowed that causes or allows movement of fluid into an underground source of drinking water if such fluid movement may cause a violation of any Primary Drinking Water Standard or may otherwise affect the health of persons. *[62-528.440(2)(c), F.A.C.]*
5. All equipment of this facility shall be operated and maintained so as to function consistently as designed in removing pollutants. The wastewater stream shall remain non-hazardous at all times. *[62-528.307(3)(b) and 62-528.400(1), F.A.C.]*
6. In the event a well must be plugged or abandoned, the permittee shall obtain a permit from the Department, as required by Rule 62-528, F.A.C. When no longer used for its intended purpose, a well shall be properly plugged and abandoned. Within 180 days of well abandonment, the permittee shall submit to the

Department the proposed plugging method, pursuant to Rule 62-528.460, F.A.C. [62-528.460(1) and 62-528.435(6), F.A.C.]

7. In accordance with rules 62-4.090 and 62-528.455(3)(a), F.A.C., the permittee shall submit an application for permit renewal at least 60 days prior to expiration of this permit. [62-528.307(3)(a), F.A.C.]
8. Hurricane Preparedness: Preparations to be made by permittee upon issuance of a "Hurricane Watch" by the National Weather Service include, but are not limited to:
 - a. Secure all onsite salt and other stockpiled additive materials to prevent surface and/or ground water contamination.
 - b. Properly secure equipment to prevent damage to well(s) and onsite treatment process equipment.
 [62-528.307(1)(f), F.A.C.]

B. Mechanical Integrity and Mechanical Integrity Testing (MIT)

1. Mechanical Integrity.
 - a. The permittee shall maintain the mechanical integrity of the well at all times.
 - b. If the Department determines that the injection well lacks mechanical integrity, written notice shall be given to the permittee.
 - c. Within 48 hours of receiving written notice that the well lacks mechanical integrity, unless the Department requires immediate cessation of injection, the permittee shall cease injection into the well unless the Department allows continued injection pursuant to subparagraph d. below.
 - d. The Department shall allow the permittee to continue operation of a well that lacks mechanical integrity if the permittee has made a satisfactory demonstration that fluid movement into or between underground sources of drinking water is not occurring.
 [62-528.307(3)(e), F.A.C.]
2. The permittee shall demonstrate mechanical integrity at least once every five years for each existing injection well. In the event operational or other data indicate a possible loss of integrity in an injection well, mechanical integrity and other testing may be required at less than a five-year interval. For each injection well, the mechanical integrity testing program shall include: a television survey, pressure test, radioactive tracer survey (RTS), and temperature log. Mechanical integrity testing shall be run and completed prior to the following dates:

Five-Year MIT	
Well Name	Required Completion Date
IW-1	September 26, 2026

[62-528.300(6)(b)2, 62-528.300(6)(c), and 62-528.425(1)(d), F.A.C.]

3. A plan describing the mechanical integrity procedures shall be submitted to the Department's APP Tallahassee and South District offices for approval at least 90 days prior to the required completion date noted above. *[62-528.307(1)(m)4, F.A.C.]*
4. The Department's South District office must be notified a minimum of seven (7) calendar days prior to all testing for mechanical integrity on the injection wells. The testing procedure must be approved by the Department before testing begins. Any change in the approved testing procedure must be approved by the Department before testing begins. All testing must be initiated during daylight hours, Monday through Friday other than State holidays, unless approval has been given by the Department. An evaluation of all test results must be submitted with all test data. *[62-528.300(6)(f), F.A.C.]*
5. Pursuant to Rule 62-528.430(2)(b)2.a., F.A.C., the final report for the demonstration of mechanical integrity for the injection wells shall be submitted to the APP Tallahassee office for review and approval within three months of the completion date for mechanical integrity testing. In addition, a copy of the cover letter for the MIT results shall be sent to the U.S. Environmental Protection Agency, Region 4, Underground Injection Control program, 61 Forsyth St. SW, Atlanta, Georgia 30303-8909, or R4gwuic@EPA.gov. The final MIT report shall be prepared by a Florida-Licensed Professional Engineer and/or Professional Geologist (as appropriate), and it shall address all tests noted in Specific Condition Number I.B.2. above (including procedures followed, results, and interpretations), and shall include a tabular presentation/graphical evaluation of monitor well data over the previous five-year period. For wells with a fluid-filled annulus, the report shall also include a tabular presentation/graphical evaluation of annular pressure data over the previous five-year period, with the addition or removal of pressure and annular fluid noted. If the well has failed any of the specified tests, or the annular pressure system exhibits leaks, the MIT report shall include a plan for corrective action for all discovered deficiencies. *[62-528.440(5)(b), F.A.C.]*

C. Surface Equipment

1. The integrity of the monitor zone sampling systems shall be maintained at all times. Sampling lines shall be clearly and unambiguously identified by monitor zone at the point at which samples are drawn. All reasonable and prudent precautions shall be taken to ensure that samples are properly identified by monitor zone and that samples obtained are representative of those zones. Sampling lines and equipment shall be kept free of contamination with independent discharges and no interconnections with any other lines. *[62-528.307(1)(f) and 62-528.307(3)(b), F.A.C.]*
2. The surface equipment for each injection well disposing of domestic (municipal) effluent shall maintain compliance with Rule 62-600.540(5), F.A.C., for water hammer control, screening, access for logging and testing, and reliability and flexibility in the event of damage to the well and effluent piping. *[62-600.540(5), 62-528.307(1)(f), and 62-528.307(3)(b), F.A.C.]*

3. Injection wells not disposing of domestic (municipal) effluent shall maintain compliance with Rule 62-528.450(2)(j), F.A.C., for water hammer control, as well as access for logging and testing, and reliability and flexibility in the event of damage to the well and effluent piping. *[62-528.450(2)(j), 62-528.307(1)(f), and 62-528.307(3)(b), F.A.C.]*
4. The surface equipment and piping for the injection and monitor wells shall be kept free of corrosion at all times. *[62-528.307(1)(f) and 62-528.307(3)(b), F.A.C.]*
5. Spillage onto the injection well pad(s) during construction activities, and any waters spilled during mechanical integrity testing, maintenance, testing, or repairs to the system(s) shall be contained on the pad(s) and directed to a sump which in turn discharges to the pumping station wet well, or via other approved means to the injection well system, or by another method approved by the Department. *[62-528.307(1)(f) and 62-528.307(3)(b), F.A.C.]*
6. The injection well pads are not, unless specific approval is obtained from the Department, to be used for storage of any material or equipment at any time. *[62-528.307(1)(f) and 62-528.307(3)(b), F.A.C.]*
7. The surficial aquifer monitor wells adjacent to the injection and monitor wells shall be secured, maintained, and retained in service for subsequent sampling that may be needed (e.g., should there be an accidental discharge to the surficial aquifer); alternatively, the facility may submit a request to the Department for cessation of sampling followed by capping, or plugging and abandonment of these wells. *[62-528.307(3)(b) and 62-520.600(6)(k), F.A.C.]*

II. Quality Assurance/Quality Control

1. The permittee shall ensure that the operation of this injection well system shall be as described in the application and supporting documents. Any proposed modifications to the permit, construction procedures, testing procedures, completion procedures, operation procedures, or any additional work not described in the application or supporting documents shall be submitted in writing to the APP Tallahassee office for review and clearance prior to implementation. Changes of negligible impact to the environment and staff time will be reviewed by the program manager, cleared when appropriate and incorporated into this permit. Changes or modifications other than those described above will require submission of a completed application and appropriate processing fee as per Rule 62-4.050, F.A.C. *[62-4.050, F.A.C.]*
2. Proper operation and maintenance include effective performance and appropriate quality assurance procedures; adequate operator staffing and training; and adequate laboratory and process controls. *[62-528.307(3)(b), F.A.C.]*
3. All water quality samples required by this permit shall be collected in accordance with the appropriate Department Standard Operation Procedures (SOP), pursuant to Rule 62-160.210, F.A.C., *Approved Field Procedures*. A certified laboratory shall conduct the analytical work, as provided by Rule 62-160.300,

F.A.C., *Laboratory Certification*. Department approved test methods shall be utilized, unless otherwise stated in this permit. All calibration procedures for field testing and laboratory equipment shall follow manufacturer's instrumentation manuals and satisfy the requirements of the Department SOPs. A listing of the SOPs pertaining to field and laboratory activities is available at the Department's website: <https://floridadep.gov/dear/quality-assurance/content/dep-sops>. [62-4.246, 62-160, F.A.C.]

4. All indicating, recording and totalizing devices associated with the injection well system shall be maintained in good operating condition and calibrated annually at a minimum. The pressure gauges, flow meter, and chart recorders shall be calibrated using standard engineering methods. [62-528.307(1)(f) and 62-528.307(3)(b), F.A.C.]
5. All reports submitted to satisfy the requirements of this permit shall be signed by a person authorized under Rule 62-528.340(1), F.A.C., or a duly authorized representative of that person under Rule 62-528.340(2), F.A.C. All reports required by this permit which are submitted to the Department shall contain the following certification as required by Rule 62-528.340(4), F.A.C.:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

[62-528.340(1), (2), and (4), F.A.C.]

6. Analyses shall be conducted on unfiltered samples, unless filtered samples have been approved by the Department as being more representative of ground water conditions. [62-520.310(5), F.A.C.]
7. An updated operation and maintenance manual, including a description of surge and water hammer control, shall be submitted to the Department within 60 days of the issuance of this permit if requested by the Department during the permit application process and was not already submitted. [62-528.415(3), F.A.C.]

III. Testing and Reporting Requirements

A. General

1. The permittee shall submit monthly to the Department the results of all injection well and monitor well data required by this permit no later than the last day of the month immediately following the month of record. The report shall include:
 - a. A cover page summarizing the current status of all monthly activities, including, but not limited to, the certification and signature required in Specific Condition Number II.5 above.

- b. Operational and water quality data in a tabular format. The following identifying information must be included on each data sheet:
 - i. Facility Name
 - ii. Well Name
 - iii. UIC Permit Number
 - iv. WACS Facility ID
 - v. WACS Testsite ID on the appropriate data sheet (as provided in Table 1 and Table 2).
- c. Laboratory pages and original supporting documentation including DEP Form FD 9000-24, *Groundwater Sampling Log*, for the purging of each monitor well.

[62-528.307(3)(d), F.A.C.]

2. The report may be sent in portable document format (.pdf) format to the following Program e-mail addresses:

South District SouthDistrict@FloridaDEP.gov
Aquifer Protection Program TAL_UIC@FloridaDEP.gov

If a paper copy of the report is submitted, it should be sent to Department staff at the following addresses:

South District 2295 Victoria Avenue, Suite 364
Ft. Myers, Florida 33901-3875
Aquifer Protection Program 2600 Blair Stone Road, MS 3530
Tallahassee, Florida 32399-2400

[62-528.307(3)(d), F.A.C.]

B. Monitoring

1. The injection system shall be monitored in accordance with Rules 62-528.425 and 62-528.430, F.A.C. The following injection well performance data and monitor zone data shall be recorded and reported in the *Monthly Operation Report* (MOR) as indicated below. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. [62-528.425, 62-528.430, F.A.C.]
 - a. Monthly (M) samples and measurements shall be taken as close to 30 days apart as possible.
 - b. Quarterly (Q) samples and measurements shall be taken during the following quarters:
 - “ January 1 – March 31
 - “ April 1 – June 30
 - “ July 1 – September 30
 - “ October 1 – December 31

Samples and measurements collected during consecutive quarters shall be taken at least 30 days apart. A MOR including quarterly results shall be noted as such on the title page of the report.

c. Annual (A) samples and measurements

“ The period for reports of annual samples and measurements shall be for the calendar year ending December 31.

Annual samples and measurements taken in consecutive years shall be taken at least 6 months apart and as close to a year apart as possible. If a MOR includes annual results, it shall be noted as such on the title page of the report.

[62-528.307(1)(m) F.A.C.]

2. The permittee shall submit the results of all injection well and monitor well data required by this permit to the Department no later than the last day of the month immediately following the month of record. *[62-528.307(2)(d)]*
3. Technical malfunctions and emergencies that interfere with the sampling schedule can be explained in the comment section of the MOR. The explanation shall include what issues occurred, how long it will take to address the issues, and an estimated time when the samples and measurements will be completed and submitted.

Table 3
Monitoring Schedule

Parameter	Unit	Recording Frequency or Sampling Method	Frequency of Analyses		
			IW-1 4060	DZMW-1 Upper Zone 7784A	DZMW-1 Lower Zone 7784B
Injection Pressure, Max.	psi	Continuous	D/M ^a		
Injection Pressure, Min.	psi	Continuous	D/M ^a		
Injection Pressure, Avg.	psi	Continuous	D/M ^a		
Flow Rate, Max.	gpm	Continuous	D/M ^a		
Flow Rate, Min.	gpm	Continuous	D/M ^a		
Flow Rate, Avg.	gpm	Continuous	D/M ^a		
Volume WTP Fluid Injected per Well	MG	Daily/Monthly	D/M		
Volume WWTP/WRF Fluid Injected per Well	MG	Daily/Monthly	D/M		
Total Volume Injected per Well	MG	Daily/Monthly	D/M		
Total Volume Injected Facility	MG	Daily/Monthly	M		
Pressure or Water Level Max.	psi or ft NAVD	Continuous		D/M ^a	D/M ^a
Pressure or Water Level Min.	psi or ft NAVD	Continuous		D/M ^a	D/M ^a
Pressure or Water Level Avg.	psi or ft NAVD	Continuous		D/M ^a	D/M ^a
pH ^b	standard units	Grab/Purge	M	M	M
Specific Conductance ^b	µmhos/cm	Grab/Purge	M	M	M
Temperature ^b	°C	Grab/Purge	M	M	M
Dissolved Oxygen ^b	mg/L	Grab/Purge		M	M
Turbidity ^b	NTU	Grab/Purge		M	M
Chloride	mg/L	Grab/Purge	M	M	M
Sulfate	mg/L	Grab/Purge	M	M	M
Total Dissolved Solids	mg/L	Grab/Purge	M	M	M
Nitrate + Nitrite as N	mg/L	Grab/Purge	M	M	M
Ammonia as N	mg/L	Grab/Purge	M	M	M
Total Kjeldahl Nitrogen	mg/L	Grab/Purge	M	M	M
Total Phosphorus as P	mg/L	Grab/Purge	M	M	M
Bicarbonate	mg/L	Grab/Purge	Q	Q	Q
Calcium	mg/L	Grab/Purge	Q	Q	Q
Total Iron	mg/L	Grab/Purge	Q	Q	Q
Magnesium	mg/L	Grab/Purge	Q	Q	Q
Potassium	mg/L	Grab/Purge	Q	Q	Q
Sodium	mg/L	Grab/Purge	Q	Q	Q
Gross Alpha	pCi/L	Grab/Purge	Q		Q
Uranium	µg/L	Grab/Purge	Q		Q
Radium ²²⁶	pCi/L	Grab/Purge	Q		Q
Radium ²²⁸	pCi/L	Grab/Purge	Q		Q
Primary & Secondary Drinking Water Standards, Source Waters		c	A		

D - Daily; M - Monthly; Q - Quarterly; A - Annually

^a - Operational data reporting for flows, pressures and water levels: daily maximum, minimum and average from continuous reporting; monthly maximum, minimum and average (calculated from daily averages).

^b - Field samples

^c - Composite and grab samples, as appropriate.

One monthly injectate sample is required regardless of which injection well is used.

Refer to Table 1, Table 2, and above for the appropriate WACS testsite IDs to be used for reporting.

- A laboratory analysis of the injectate for the Primary and Secondary Drinking Water Standards of Chapter 62-550, F.A.C., shall be submitted annually. The

report of analysis shall be submitted in accordance with Specific Condition II.5 of this permit.

- a. For facilities permitted to inject domestic wastewater, the domestic wastewater annual sample results may be the same as submitted for the domestic wastewater program if taken within the last 12 months. Primary and Secondary Drinking Water Standards of Chapter 62-550, F.A.C., not included in the domestic wastewater annual sample requirements shall be included in the same sample or in a separate sample. If not required annually for the domestic wastewater program, a separate sample shall be taken and reported for this permit. The samples shall be composite and grab samples as appropriate for the domestic wastewater program. The permittee may choose to take a combined annual sample from multiple domestic waste streams if they are authorized for injection in this permit.
- b. For facilities permitted to inject water other than domestic wastewater, the source water samples shall not be combined with domestic wastewater samples. The samples shall be grab samples. The permittee may choose to take a combined annual sample from multiple non-domestic waste streams if they are authorized for injection in this permit.
- c. The report should be sent to the addresses in Specific Condition III.A.2
For renewal of this permit, the permittee shall submit a separate laboratory analysis for each permitted injectate source.

[62-528.425(1)(a), F.A.C.]

5. Monitor well purging and field stabilization parameter measurement is required prior to the collection of laboratory samples for the MORs. The facility shall conduct the monitor well sampling following the monitor well sampling protocols specified in FS 2200-*Groundwater Sampling* in the DEP-SOP-001/01 Standard Operating Procedures for Field Activities. The results of the purging techniques and field stabilization parameters shall be provided on DEP Form FD 9000-24 or a similar alternative approved by the Department, and the completed forms shall be submitted to the Department with the MORs.
 - a. Calculate the volume of water in the well casing (or sample pipe if installed), and the monitoring interval. For dual zone monitor wells, calculate the upper monitor zone volume with allowance for reduced volume due to the hollow cylinder created by the lower zone tubing. Purge until the water level has stabilized (when the well recovery rate equals the purge rate), purging a minimum of one well volume, and then collect the first set of stabilization parameters.
 - b. Thereafter, collect stabilization parameters after every $\frac{1}{4}$ well volume beyond the initial one volume.

- c. Purging shall be complete when three consecutive readings of the parameters listed below are within the following ranges^[1] **and** a minimum of 1.5 well casing volumes of fluid since the beginning of purging have been evacuated from the monitor well:
 - pH: ± 0.2 Standard Units
 - Specific Conductance: $\pm 5.0\%$ of reading
 - Temperature: $\pm 0.2^\circ$ C
 - Dissolved Oxygen: $\leq 20\%$ Saturation or ± 0.2 mg/L
 - Turbidity: ≤ 20 NTU
- d. If necessary, continue to take the above readings every additional $\frac{1}{4}$ well volume until three consecutive readings meet the above criteria.
- e. Typical field conditions may not allow the temperature parameter to be met. If all the other purging criteria have stabilized, the sampling team leader may decide whether to collect a sample if the temperature criteria has not been met (DEP SOP FS2212 Section 3.6). Documentation as to why the sample was collected without meeting a field parameter must be recorded in the ground water sampling log.
- f. If three consecutive $\frac{1}{4}$ well volume readings have not reached the stabilization criteria listed above by the time the fifth well volume has been reached, the monitor well sample shall be taken, and document the reason(s) in the ground water sampling log.
- g. If a sampling pipe is used for purging, the sampling pipe volume will substitute for the well casing volume.

The Department will consider an alternate purging method meeting monitor well sampling protocol in DEP-SOP-001/01 FS 2200 *Groundwater Sampling* where the above procedure causes a hardship to the facility. The permittee shall request an alternate method and receive written Department approval before implementing it. [62-160.210(1) and 62-528.430(2), F.A.C.]

6. The flow from the monitor zones during well evacuation and sampling shall not be discharged to surface waters or aquifers containing an underground source of drinking water. Waters purged from monitor wells in preparation for sampling shall be diverted to the injection wellhead via the pad drainage system, wet well, or treatment plant. [62-4.030 and 62-620.320, F.A.C.]

IV. Abnormal Events

1. In the event the permittee is temporarily unable to comply with any of the conditions of a permit due to breakdown of equipment, power outages or destruction by hazard of fire, wind, or by other cause, the permittee of the facility shall notify the South District office. [62-528.415(4)(a), F.A.C.]

^[1] Provided dissolved oxygen in the groundwater of the zone being monitored is $\leq 20\%$ of saturation for the measured temperature and turbidity is ≤ 20 NTUs. This assumption holds true for groundwater in most zones of the Floridan aquifer.

2. Notification shall be made in person, by telephone, or by electronic mail (e-mail) within 24 hours from the time the permittee becomes aware of a breakdown or malfunction to the South District office. *[62-528.307(1)(x), F.A.C.]*
3. A written report of any noncompliance referenced in Specific Condition Number IV.1 above shall be submitted to the South District office and the APP Tallahassee office within five days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its reoccurrence, emergency procedures in use pending correction of the problem, and the time when the facility will again be operating in accordance with permit conditions. *[62-528.415(4)(b), F.A.C.]*

4. **Reporting Requirements**

The permittee shall report to the Department's South District any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain: a description of the noncompliance and its cause; the period of noncompliance including exact dates and time, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

- a. The following shall be included as information which must be reported within 24 hours under this condition:
 - 1) Any unanticipated bypass which causes any reclaimed water or effluent to exceed any permit limitation or results in an unpermitted discharge,
 - 2) Any upset which causes any reclaimed water or the effluent to exceed any limitation in the permit,
 - 3) Violation of a maximum daily discharge limitation for any of the pollutants specifically listed in the permit for such notice, and
 - 4) Any unauthorized discharge to surface or ground waters.
- b. Oral reports as required by this subsection shall be provided as follows:
 - 1) For unauthorized releases or spills of treated or untreated wastewater reported pursuant to subparagraph (a)4. that are in excess of 1,000 gallons per incident, or where information indicates that public health or the environment will be endangered, oral reports shall be provided to the **State Watch Office Toll-Free Number 800-320-0519**, as soon as practical, but no later than 24 hours from the time the permittee becomes aware of the discharge. The permittee, to the extent known, shall provide the following information to the State Watch Office:
 - a) Name, address, and telephone number of person reporting;

- b) Name, address, and telephone number of permittee or responsible person for the discharge;
 - c) Date and time of the discharge and status of discharge (ongoing or ceased);
 - d) Characteristics of the wastewater spilled or released (untreated or treated, industrial or domestic wastewater);
 - e) Estimated amount of the discharge;
 - f) Location or address of the discharge;
 - g) Source and cause of the discharge;
 - h) Whether the discharge was contained on-site, and cleanup actions taken to date;
 - i) Description of area affected by the discharge, including name of water body affected, if any; and
 - j) Other persons or agencies contacted
- 2) Oral reports, not otherwise required to be provided pursuant to subparagraph b.1 above, shall be provided to the Department's South District within 24 hours from the time the permittee becomes aware of the circumstances.
- c. If the oral report has been received within 24 hours, the noncompliance has been corrected, and the noncompliance did not endanger health or the environment, the Department's South District shall waive the written report.
[403.077(2)(d), F.S., 62-528.307(1)(e) and 62-528.307(1)(x), F.A.C.]

5. **Pollution Notification**

- a. In accordance with subsection 403.077, F.S., in the event of a reportable pollution release, an owner or operator of the installation at which the reportable pollution release occurs must provide to the department information reported to the State Watch Office within the Division of Emergency Management pursuant to any department rule, permit, order, or variance, within 24 hours after the owner's or operator's discovery of such reportable pollution release. The Department's Pollution Notice website is at <https://floridadep.gov/pollutionnotice>.
- b. If multiple parties are subject to the notification requirements based on a single reportable pollution release, a single notification made by one party in accordance with this section constitutes compliance on behalf of all parties subject to the requirement. However, if the notification is not made in accordance with this section, the department may pursue enforcement against all parties subject to the requirement.
- c. If, after providing notice pursuant to paragraph (a), the owner or operator of the installation determines that a reportable pollution release did not occur or that an amendment to the notice is warranted, the owner or operator may submit a letter to the department documenting such determination.

- d. If, after providing notice pursuant to paragraph (a), the installation owner or operator discovers that a reportable pollution release has migrated outside the property boundaries of the installation, the owner or operator must provide an additional notice to the department that the release has migrated outside the property boundaries within 24 hours after its discovery of the migration outside of the property boundaries.

[403.077(2)(d), F.S., 62-528.307(1)(e) and 62-528.307(1)(x), F.A.C.]

V. Emergency Disposal

1. All applicable federal, state and local permits must be in place to allow for any alternate discharges due to emergency or planned outage conditions. *[62-528.415(4)(c)1, F.A.C.]*
2. Any proposed changes in emergency disposal methods shall be submitted to the South District office and the APP Tallahassee office for review and approval prior to implementation. *[62-528.415(4)(c), F.A.C.]*
3. The emergency disposal method must be fully operational in the event of planned or emergency outages of the injection well system. *[62-528.415(4)(c)2, F.A.C.]*

VI. Financial Responsibility

1. The permittee shall maintain at all times the financial resources necessary to close, plug, and abandon the injection and associated monitor wells. *[62-528.435(9), F.A.C.]*
2. The permittee shall annually review the cost estimate for plugging and abandonment. Upon the occurrence of the plugging and abandonment cost estimate exceeding, by 10 percent or more on an annual basis, the cost estimate upon which the current financial responsibility is based, the permittee shall submit to the Department certified financial documentation necessary to amend, renew, or otherwise replace the existing financial responsibility pursuant to Rule 62-528.435(9)(b), F.A.C. and the conditions of this permit. *[62-528.435(9)(b), F.A.C.]*
3. In the event that the mechanism used to demonstrate financial responsibility should become insufficient or invalid for any reason, the permittee shall notify the APP Tallahassee office in writing within 14 days of such insufficiency or invalidation. The permittee shall within 90 days of said notification submit to the APP Tallahassee office for approval new financial documentation certifying either the remedy of current financial insufficiency or resolution of the financial instrument invalidation to comply with Rule 62-528.435(9)(b), F.A.C, and the conditions of this permit. *[62-528.435(9)(b), F.A.C.]*

General Conditions

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit are "permit conditions" and are binding and enforceable pursuant to section 403.141, F.S. *[62-528.307(1)(a), F.A.C.]*

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action. *[62-528.307(1)(b), F.A.C.]*
3. As provided in subsection 403.087(7), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit. *[62-528.307(1)(c), F.A.C.]*
4. This permit conveys no title to land, water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title. *[62-528.307(1)(d), F.A.C.]*
5. This permit does not relieve the permittee from liability for harm to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties there from; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department. *[62-528.307(1)(e), F.A.C.]*
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, or are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules. *[62-528.307(1)(f), F.A.C.]*
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of this permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
 - d. Reasonable time will depend on the nature of the concern being investigated.*[62-528.307(1)(g), F.A.C.]*

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent the recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

[62-528.307(1)(h), F.A.C.]
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules. *[62-528.307(1)(i), F.A.C.]*
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. *[62-528.307(1)(j), F.A.C.]*
11. This permit is transferable only upon Department approval in accordance with rules 62-4.120 and 62-528.350, F.A.C. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. *[62-528.307(1)(k), F.A.C.]*
12. This permit or a copy thereof shall be kept at the work site of the permitted activity. *[62-528.307(1)(l), F.A.C.]*
13. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records shall be extended automatically unless the Department determines that the records are no longer required.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

- c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used;
 - 6) The results of such analyses.
- d. The permittee shall furnish to the Department, within the time requested in writing, any information which the Department requests to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- e. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

[62-528.307(1)(m), F.A.C.]

- 14. All applications, reports, or information required by the Department shall be certified as being true, accurate, and complete. *[62-528.307(1)(n), F.A.C.]*
- 15. Reports of compliance or noncompliance with, or any progress reports on, requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each scheduled date. *[62-528.307(1)(o), F.A.C.]*
- 16. Any permit noncompliance constitutes a violation of the Safe Drinking Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *[62-528.307(1)(p), F.A.C.]*
- 17. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[62-528.307(1)(q), F.A.C.]*
- 18. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit. *[62-528.307(1)(r), F.A.C.]*
- 19. This permit may be modified, revoked and reissued, or terminated for cause, as provided in 40 C.F.R. sections 144.39(a), 144.40(a), and 144.41 (1998). The filing of a request by the permittee for a permit modification, revocation or reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition. *[62-528.307(1)(s), F.A.C.]*
- 20. The permittee shall retain all records of all monitoring information concerning the nature and composition of injected fluid until five years after completion of any plugging and abandonment procedures specified under rule 62-528.435, F.A.C. The permittee shall deliver the records to the Department office that issued the

permit at the conclusion of the retention period unless the permittee elects to continue retention of the records. *[62-528.307(1)(t), F.A.C.]*

21. All reports and other submittals required to comply with this permit shall be signed by a person authorized under rules 62-528.340(1) or (2), F.A.C. All reports shall contain the certification required in rule 62-528.340(4), F.A.C. *[62-528.307(1)(u), F.A.C.]*
22. The permittee shall notify the Department as soon as possible of any planned physical alterations or additions to the permitted facility. In addition, prior approval is required for activities described in rule 62-528.410(1)(h). *[62-528.307(1)(v), F.A.C.]*
23. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or injection activity which may result in noncompliance with permit requirements. *[62-528.307(1)(w), F.A.C.]*
24. The permittee shall report any noncompliance which may endanger health or the environment including:
 - a. Any monitoring or other information which indicates that any contaminant may cause an endangerment to an underground source of drinking water; or
 - b. Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.

Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause, the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
[62-528.307(1)(x), F.A.C.]

Permittee: City of Marco Island
Jeffrey Poteet, General Manager of Water and Sewer Department
Marco Island Reclaimed Water Production Facility

UIC Permit: 0280170-011-UO/1X
WACS Facility ID: 73754
Date: May 13, 2025

Issued this 13th day of May 2025
State of Florida
Department of Environmental Protection

Richard Lobinske

Richard Lobinske, Ph.D.
Environmental Administrator
Underground Injection Control
Aquifer Protection Program
Division of Water Resource Management