

# Talking Points for March 10 Public Hearing on ASR Well Testing, 6:30p.m., Rockledge City Hall, 1600 Huntington Lane, Rockledge

\*\*\* Join us in asking Rockledge City Council to not submit the cycle testing application to the Florida Department of Environmental Protection (FDEP) for Rockledge's planned Aquifer Storage and Recovery (ASR) well. These test injections would pollute our aquifer with 230 million gallons of sewage wastewater. \*\*\*

## **Facts to consider:**

**1. ARSENIC:** Arsenic, a very dangerous and highly carcinogenic contaminant, would be released into groundwater by injecting oxygen rich water. Cycle testing of ASR wells in Cocoa, Port Canaveral and around the state caused arsenic releases at levels above EPA groundwater standards.

**2. CONTAMINATION OF THE AQUIFER:** Normally, cycle testing uses potable water, but to save money the City is planning to use reclaimed water as will be used when in operation. This sewage wastewater, containing birth control chemicals, prescription drugs, fecal coliform, personal care products, plasticizers, endocrine disruptors, and a long list of carcinogenic contaminants, would be injected directly into the Floridan aquifer 370 to 470 feet deep. Once polluted, our **Underground Source of Drinking Water** (USDW) would be contaminated permanently.

**3. HIGHLY FRACTURED, NON-CONFINING AQUIFER:** According to a 2008 letter by Rockledge's ASR engineers, Jones, Edmunds and Associates (JEA), the top of the Floridan aquifer in Rockledge is: "highly fractured with large conduit flow zones." Geologists consider the confining layer, the layer that separates the surficial aquifer from the Floridan, to be too thin (less than 35 feet) to prevent the upward flow of injected sewage wastewater into the surficial aquifer and the Indian River Lagoon. At least 480 private wells are known to exist within one mile of the injection site. 82 of those wells are into the Floridan aquifer, 353 wells are surficial and 45 are of unknown depth.

**4. RECOMMENDATIONS IGNORED:** Despite the 2004 JEA Reuse Study that stressed conservation and metering as an integral part of short- and long-term reclaimed water solutions, the City has delayed implementing these steps until recently and only after spending millions of dollars on the ASR well. Conserving reclaimed water through metering, enforcement and public education campaigns would save more than 50% of reclaimed water and make an ASR well unnecessary. Additionally, initial estimates of city growth and reclaimed water projections proved inaccurate and have not been updated.

**5. WATER RIGHTS:** The City was required by the FDEP and Florida Rule 62-610.563(6) to own and operate all potable wells within a one mile radius of the injection site because the proposed injections would contaminate the aquifer and **pose a risk to public health**. The 2006 "well ban" ordinance was enacted without personal notice to the approximately 2,000 property owners in the one-mile radius. No compensation has been offered to owners with private wells for contaminating their well water - this constitutes an inverse taking of water rights.

**6. ALL PAY, FEW BENEFIT:** Citizens of Rockledge were taxed for the ASR well and reclaimed water lines, however just 15% have access to reclaimed water.

**7. EXPERIMENTAL INJECTIONS:** The City is proposing to inject 230 million gallons of reclaimed water over a two-year period to conduct the cycle tests. Actual recovery rates are unknown but a percentage of the injected water would never be recovered. The FDEP does not impose any recovery requirement; the only criteria is being "economically feasible".

**8. NOT CONSERVATION:** In conjunction with the ASR well system, the City plans to annually extract 78 million gallons from the Upper Floridan Aquifer to augment the reclaimed water system. That's equivalent to 52 Cocoa Water Towers each year.

**9. SAFE SOLUTIONS:** The top priority should be to protect and conserve clean water, such as the Floridan aquifer under Rockledge. Conserving water used in homes by encouraging water saving toilets, shower heads, and washers, also reduces wastewater amounts. Reclaimed water can be conserved by metering the users, and adopting a rate structure, estimated to save 50% or more of Rockledge's reclaimed water. Encouraging homeowners to landscape with Florida friendly plants that survive without maintenance or irrigation would further reduce demand. Reclaimed water can be safely stored in above ground storage tanks. Don't pollute our Underground Source of Drinking Water to water lawns.

*Save Our Aquifer, Inc., situated at Rockledge, Florida, is organized to protect the Floridan aquifer system and Underground Sources of Drinking Water (USDW), promote awareness, educate the public, elected officials and agency staff, and conduct other such related activities necessary to its mission. Through awareness and education, Save Our Aquifer is working to protect the aquifer and the lagoon for ourselves and future generations.*

Website: [www.saveouraquifer.org](http://www.saveouraquifer.org), Email: [info@saveouraquifer.org](mailto:info@saveouraquifer.org), Telephone: 321-504-3668, Address: PO Box 251, Cocoa, FL 32923