**Issue 5.**

**Inactive Pump Issue:**

In the CRS area, there is a sizable percentage of homes experiencing seasonal occupancy—often vacant from about April to as late as January. The individual grinder pumps at these homes will sit dormant for these many months in whatever liquids and gasses the grinder pits contain or generate. The grinder pump manufacturer (E/One) recommends filling the pits with water sufficiently to activate the pump and then turning off the water so that the pit contents are diluted and minimized. That recommendation is stated to likely be adequate to protect the pump from damage for up to 2 weeks. They have cautioned that a long period of inactivity may be sufficient to render the pump inoperative. Causes of possible failure include corrosion of the steel and cast iron grinder mechanism, seepage past shaft or casing o-rings allowing moisture into the motor and electrical components, and bearing failure. Current plans are to maintain a 2% quantity of spare pump cores. The percentage of seasonal residences that can be expected to require a yearly pump replacement is much higher. Even without considering the seasonal replacement issue, a minimum inventory of spare pumps totaling 3% is called by Design and Specification Guidelines for Low Pressure Sewer Systems (1981) DEP (incorporated by reference 62-604.300 (j) F.A.C.), page I-13. Considering the inadequate minimum number of spares for even normal operating conditions coupled with the reasonably expected seasonal emergency replacement demand, FKAA has little hope of complying with 62-604.500(2) F.A.C.

62-604.500(2) F.A.C. states “All collection/transmission systems shall be operated and maintained so as to provide uninterrupted service as required by this rule.”

62-604.600(9) F.A.C. states “If, after review of Form 62-604.300(8)(a) and any supporting documentation, the Department determines that the applicant has not provided reasonable assurance that the construction, modification, expansion, or operation of the installation will be in accordance with applicable laws or rules, including rules of delegated local programs, the Department shall deny the permit or notify the applicant that the general permit cannot be used, as appropriate.”

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