

October 18, 2005

Ms. Colleen Castille  
Secretary  
Florida, Department of Environmental Protection  
3900 Commonwealth Boulevard  
MS—10  
Tallahassee, FL 32399-3000

**Re: Coggins Farm Supply**

Dear Ms. Castille:

As you are aware, there have been significant, protracted discussions, as well as litigation on the issue of the management of surface and ground waters flowing into the State of Florida from our neighbors to the north. For example, concerns repeatedly arise over the discharge of pollutants into waterways such as the Ochlocknee and Suwannee Rivers. This pollution can impact not only wildlife and vegetation, but also the region's drinking water supply to the extent that it is allowed to impact the Floridan Aquifer.

The purpose of this correspondence is to alert you to another source of pollution coming from southern Georgia. This pollution is generated by an agricultural concern known as the Coggins Farm Supply operating out of Lake Park, Georgia near Valdosta. According to a number of individuals who live in the area, the operation has been routinely discharging pollutants such as Vapam and Telone into the Alapahoochee River and contiguous wetlands. This water system discharges into the Alapaha River and what is designated by EPA as the Alapaha River Watershed. The Alapaha River then discharges into the Suwannee River. I am sure that you are aware that the Suwannee River is designated as an Outstanding Florida Water, pursuant to 62-302.700(9)(c)70 et seq., F.A.C. Thus, it is entitled to the highest degree of protection that the State of Florida can provide.

In addition to the potential impacts to the Suwannee River, a Design Development Report (DDR) submitted to the Georgia Environmental Protection Division (EPD) by Coggins'

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consultant has pointed out that the water table in the area is such that groundwater can be found from **one to eight** feet below the surface. Surficial aquifers run through this area. But more importantly for the State of Florida, this area is directly above the Floridan Aquifer, which lies from **125 to 165** feet below the surface in that area. Given that many municipalities, as well as much of north Florida, obtain their drinking water from the Floridan Aquifer, the potential for negative impacts to this vital water system should be a cause for alarm.

Florida PEER was alerted to this situation by residents in the South Georgia area who were concerned about the continued pollution to the Alapahoochee River. Accordingly, we have obtained records from not only EPA, but also the Georgia EPD and frankly, these records demonstrate a continuous failure by both of those agencies to seriously investigate the residents' complaints. There have been repeated violations of solid waste laws, as well as blatant discharges of wastewaters into not only the surrounding wetlands, but even into roadside ditches in plain view of the public. Neighboring residents no longer use their private wells for drinking water, but rely on bottled water for consumption. In addition, there is a suspiciously high incidence of cancer in the area immediately surrounding the operation. With all of this, however, federal, state and local officials have failed to require the company to come into compliance.

We write to you to ask that, as Secretary of the State of Florida, Department of Environmental Protection, you take all necessary steps to ensure that aggressive monitoring of the Suwannee River is undertaken—both in accordance with state law, but also in accordance with the National Pollutant Discharge Elimination Program as delegated to Florida by the EPA. If violations are found, we ask that the FDEP aggressively enforce the laws at your disposal to ensure that the offending activities cease. Finally, we ask that you use the influence of your position to encourage the Georgia, EPD to take aggressive measures to eliminate the unpermitted discharges that seem to be regularly occurring.

I have enclosed a copy of Florida PEER's white paper on this matter. This white paper details the situation and the federal and state responses to the complaints of the citizenry. Should you have any questions please do not hesitate to contact me.

Sincerely,

Jerry Phillips  
Director

Encl.