

City Commission

AGENDA ITEM REPORT



Meeting: City Commission - 16 Jun 2026
Presenter: Kevin Miller, Environmental Services
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TITLE

Ordinance No. 2026-23 - First Reading - Updating And Standardizing The Permitting And Fee Structure For Wastewater Discharge Permits Issued By The Environmental Control Division Of The Environmental Services Department

SUMMARY:

Purpose/Overview

The proposed ordinance updates and standardizes the permitting and fee structure for wastewater discharge permits administered by the Environmental Control Division of the Environmental Services Department. The revisions are intended to modernize the City's permitting and billing processes, improve administrative efficiency, enhance compliance monitoring, and establish a consistent annual renewal cycle for regulated permits.

Background/Context

In 2022, Environmental Services initiated efforts to transition away from the outdated EC Track permitting and billing system. As part of that initiative, the Department originally planned to coordinate with Pinellas County Utilities to integrate Environmental Control Division permit fees into utility water bills. This approach was intended to improve collection efforts and reduce delinquent permit accounts by linking permit compliance to utility service billing. Accordingly, the Sewer Use Ordinance was structured to reflect this proposed process, including provisions for bi-monthly billing consistent with the Pinellas County Utilities billing cycle.

As the EC Track system became increasingly unserviceable and ultimately reached end-of-life status, implementation of the County integration experienced repeated delays and lacked a defined timeline for completion. In order to maintain continuity of operations, Environmental services redirected previously allocated funding for Pinellas County Utilities toward implementation of the City's Licensing and Permitting platform (LCAP) utilizing Tyler Technologies software. The new system went live in April 2026.

Following the implementation of LCAP, staff conducted a broader review of the Department's existing permitting and billing structure. The current system contains multiple billing schedules and renewal cycles that create administrative inefficiencies and customer confusion. Commercial Users (CU) are currently billed in batches semiannually, while Privately Owned Collection and Transmission System (POCTS) permits operate on staggered two-year permit cycles with annual permits issued at varying times throughout the year. Facilities that hold multiple permit types are unable to consolidate payments into a single billing cycle under the current structure.

The proposed ordinance revisions establish a standardized annual billing cycle aligned with the City's Business Tax Receipt (BTR) cycle of October 1 through September 30. The proposed changes are intended to streamline billing administration, improve payment tracking and reconciliation, reduce delinquent accounts, and provide a more predictable and understandable renewal process for permit holders. In addition, the ordinance revisions update existing code language that was originally drafted to support the previously contemplated bi-monthly utility billing integration with Pinellas County Utilities, ensuring the Sewer Use Ordinance accurately reflects the City's current permitting and billing structure under the LCAP system.

Discussion/Analysis

Implementation of the City's LCAP permitting platform provides an opportunity to modernize and standardize Environmental Services permitting operations. Aligning permit renewals with the annual BTR would allow businesses to coordinate required payments through a singular annual process while improving the City's ability to monitor permit compliance and reduce administrative burden.

The proposed ordinance revisions include updates to the Sewer Use Ordinance fee structure and associated fee tables to support the transition to the new billing framework. The ordinance also establishes a one-time Billing Transitional Period from April 1, 2026, through September 30, 2026, to align existing permits with the new annual renewal cycle.

During the transitional period, permit fees would be prorated as follows:

- Permits issued or renewed between April 1 and June 30, 2026: 50% of the annual permit fee
- Permits issued or renewed between July 1 and September 30, 2026: 25% of the annual permit fee

Beginning October 1, 2026, all permits governed by the ordinance would renew annually at the full applicable fee amount unless otherwise specified.

The Finance Department, Building Department, Community Development Department, and Information Technology Department have reviewed the proposed changes and support the recommended approach. Environmental Services also intends to conduct public outreach and stakeholder education efforts prior to implementation to assist businesses with understanding the revised process and renewal requirements.

CITY ATTORNEY REVIEWED:

Yes

CONSISTENT WITH:

Strategic Plan

POTENTIAL MOTION / DIRECTION REQUESTED:

I MOVE TO APPROVE/DISAPPROVE ORDINANCE NO. 2026-23 ON FIRST READING AND SCHEDULE A SECOND READING AND PUBLIC HEARONG ON JULY 21, 2026.

ATTACHMENTS:

[Ordinance No. 2026-23](#)

[Business Impact Estimate](#)

ORDINANCE NO. 2026-23

AN ORDINANCE OF THE CITY OF LARGO, FLORIDA, AMENDING CHAPTER 23 OF THE LARGO CITY CODE BY REVISING PROVISIONS RELATED TO ENVIRONMENTAL SERVICES PERMITTING AND FEE STRUCTURES; SPECIFICALLY AMENDING ARTICLE II, DIVISION 5, SECTIONS 136, 137, 139, AND ARTICLE IV SECTION 188, TO UPDATE AND STANDARDIZE BILLING PRACTICES FOR COMMERCIAL WASTEWATER DISCHARGE PERMITS (CWDP) AND PRIVATELY OWNED COLLECTION AND TRANSMISSION SYSTEM (POCTS); REMOVING OUTDATED AND INCONSISTENT BILLING LANGUAGE ASSOCIATED WITH PRIOR SYSTEMS AND UNIMPLEMENTED UTILITY BILLING INTEGRATION; ESTABLISHING A UNIFORM ANNUAL BILLING CYCLE ALIGNED WITH THE CITY'S BUSINESS TAX RECEIPT (BTR) PERIOD (OCTOBER 1 THROUGH SEPTEMBER 30); PROVIDING FOR PRORATED PERMIT FEES FOR NEW USERS PERMITTED DURING THE BILLING CYCLE; CLARIFYING THAT ALL FEES ARE REGULATORY IN NATURE AND NOT SUBJECT TO EXEMPTIONS OR REDUCTIONS; UPDATING PERMIT DURATION, RENEWAL, AND ADMINISTRATIVE PROVISIONS TO IMPROVE CONSISTENCY, ENFORCEABILITY, AND OPERATIONAL EFFICENCY; PROVIDING FOR SEVERABILITY; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the City of Largo ("City") maintains an environmental services program responsible for regulating wastewater discharges, including commercial wastewater discharge permits ("CWDP") and privately owned collection and transmission systems ("POCTS"); and

WHEREAS, the City previously utilized an outdated permitting and billing system and anticipated integration of permit fees with external utility billing, which was ultimately not implemented; and

WHEREAS, certain provisions of Chapter 23 of the City Code currently reflect outdated, inconsistent, or unimplemented billing practices, including references to billing structures that are no longer operationally feasible; and

WHEREAS, the City has transitioned to a modern licensing and permitting system to improve operational efficiency, tracking, and administration of permits and fees; and

WHEREAS, the current billing structures for CWDP and POCTS programs are inconsistent, with differing billing cycles and renewal schedules that create administrative inefficiencies and confusion for both staff and customers; and

WHEREAS, the City Commission finds that establishing a uniform, annual billing cycle aligned with the City's business tax receipt ("BTR") period of October 1 through September 30 will improve clarity, efficiency, compliance, and revenue collection; and

WHEREAS, the City Commission further finds that implementing prorated permit fees for newly issued permits during the permit year is necessary to ensure fairness and administrative flexibility; and

WHEREAS, the fees imposed under these programs are regulatory in nature and are intended to recover the costs of administering and enforcing the environmental services program; and

WHEREAS, the City Commission finds that such regulatory fees should not be subject to exemptions, waivers, or reductions otherwise applicable to business tax receipts or other provisions of the City Code; and

WHEREAS, the proposed amendments to Chapter 23 are necessary to update permit duration, renewal procedures, fee structures, and enforcement provisions to ensure consistency, clarity, and effective program administration; and

WHEREAS, the City Commission finds that adoption of these amendments serves the public health, safety, and welfare by improving regulation of wastewater discharges and protecting the City's sanitary sewer system.

NOW, THEREFORE, THE CITY OF LARGO CITY COMMISSION HEREBY ORDAINS:

SECTION 1. That the above recitals are true and correct and are hereby incorporated by reference as the findings of the City Commission.

SECTION 2. That Section 23-136 of the Largo City Code is amended as follows:

Sec. 23-136. Commercial wastewater discharge permit required.

- (a) Permit required. To ensure compliance with this Division 5, Article II, no commercial laundry, commercial vehicle wash or garage facility, or a food service facility shall discharge process wastewater into the WWTF without first obtaining a commercial wastewater discharge permit (CWDP) from the city, except that a commercial user which has filed a timely application pursuant to this division may continue to discharge until such time as the application has been processed by the city and a permit is issued. If a permit is ultimately denied, the commercial user shall cease discharging into the WWTF.
- (b) Users requiring a CWDP shall be subject to all provisions of this Division 5, Article II and all other applicable federal, state, and local laws and regulations. Users subject to a CWDP shall abide by the terms and conditions of the permit. User charges and fees established by

the city shall be paid by the user. All rates and fees are established in Table 23-136—Commercial Wastewater Discharge Rates and Fees. All applicable user permit fees shall be assessed and collected in accordance with the annual billing cycle established by the Control Authority and aligned with the City’s Business Tax Receipt (BTR) cycle.

- (c) The city shall approve, deny, or approve with special conditions, all applications for such authorization within 30 days of receipt of a complete application.
- (d) Each CWDP approved by the city shall be effective for a period of one year, ~~and may include special conditions as required by the city.~~ and shall be aligned with the City’s Business Tax Receipt (BTR) cycle (October 1 through September 30), unless otherwise established by the Control Authority for transition purposes, and may include special conditions as required by the City.
- (e) The CWDP required by the city shall be in addition to any other permits, registrations, or occupational licenses which may be required by federal, state, or local agencies having lawful jurisdiction.
- (f) Exemptions. Notwithstanding any provision of the City Code to the contrary, no exemptions, waivers, or reductions in fees shall apply to Commercial Wastewater Discharge Permit (CWDP) application fees, permit fees, or any other charges established under this Division. This includes, but is not limited to, exemptions applicable to Business Tax Receipts (BTRs) for veterans, spouses of veterans, active or former members of the United States Armed Forces, low-income individuals, or any other category established by law or ordinance.

Table 23-136—Commercial Wastewater Discharge Rates and Fees

RATE OR FEE TYPE*	AMOUNT	BILLING BASIS
Pre-permit inspection fee. (First and second pre-permit inspection included in initial permit application fee)	\$0	NA
Third pre-permit inspection fee, if needed due to failure of applicant to correct deficiencies	\$250	Per Inspection
Fourth and each subsequent pre-permit inspection fee, if needed due to failure of applicant to correct deficiencies	\$500	Per Inspection
CWDP Application Fee—Initial	\$100	Per device
CWDP Application Fee—Renewal	\$100	Per device <u>Billed annually</u> Billed bi-monthly
CWD Annual Permit Fee <u>Failure to Renew CWDP</u>	\$100	Per device <u>Billed bi-monthly</u>
Variance Fee	\$280	Per variance determination
Administrative Order fee	\$50	Per violation
Failure to maintain documentation of CWD device or proof of maintenance or service ¹	\$75	Per violation
Failure to pump CWD device as required	\$350	Per violation

Failure to repair CWD device within five business days of discovery or notification	\$500	Per violation, Per notification
Failure to install or replace CWD device as required	\$500	Per violation, Per notification
Return site visits to review corrections of deficiencies noted during inspections	\$50.00 per hour (or current hourly rate for city staff members)	One hour minimum, billed by the hour
Investigate violations of local, state, or federal rules or regulations	\$50.00 per hour (or current hourly rate for city staff members)	One hour minimum, billed by the hour
Failure to provide access to CWD device during inspection (either scheduled or unannounced)	\$100	Per violation/per inspection
Analytical fees incurred by the city for analysis of samples on behalf of the permittee	Actual Costs	Per sample collected
Other fees as the city may deem necessary to carry out the commercial wastewater discharge program	As determined by the department director	As determined by the department director

*Rates and fees applicable to all commercial wastewater discharge program devices, including grease traps, grease interceptors, laundry waste interceptors (lint traps) and oil/water separators. Such rates and fees shall be in addition to any fines or penalties imposed by any enforcement actions.

*All Commercial Wastewater Discharge Permit (CWDP) fees shall be assessed on an annual basis and invoiced in alignment with the City's Business Tax Receipt (BTR) cycle (October 1 through September 30). The Control Authority may establish prorated fees or adjusted billing periods as necessary during implementation of this alignment.

¹ Each instance in which the permittee fails to produce documentation upon request or fails to document the pump out/cleaning of a device shall constitute a separate violation.

SECTION 3. That Section 23-137 of the Largo City Code is amended as follows:

Sec. 23-137. Commercial wastewater discharge user permit application.

- (a) All commercial laundry, commercial vehicle washing or garage facilities, or food service facilities required to install a grease trap, grease interceptor, oil water separator or laundry waste interceptor (lint trap) pursuant to the Florida Building Code and that are located within the city's sanitary sewer service area must apply on a form provided by the city. Each application shall include the following information:
 - (1) Name of applicant. If the applicant is a partnership, corporation, or other business entity, the name of the individual who can legally act on behalf of the organization, must be provided.

- (2) Facility's address and phone number, including information for person(s) who may be contacted at times other than regular business hours.
- (3) Number of employees, number and times of shifts, and hours and days of operations.
- (4) A description of the activities, facilities, and processes on the premises.
- (5) A drawing of sufficient detail to show the location of all fixtures that introduce fats, oils, grease or other prohibited materials into the sewer system, and all sewers, floor drains, sewer connections and grease/solids interceptors and appurtenances.
- (6) The applicant must submit a copy of any other permits, registrations, or occupational licenses which may be required by federal, state, or local agencies having lawful jurisdiction.
- (7) A signed statement that the information provided is accurate, and that the applicant agrees to abide by the regulations contained in this article, as well as all applicable federal, state, and local regulations governing their activities.
- (8) Any other information as determined by the city to be necessary to evaluate the permit application.

(b) Billing Transition Period. To facilitate implementation of the revised permitting and billing cycle, the City hereby establishes a one-time Billing Transitional Period.

(1) Transitional Period Defined.

The Billing Transitional Period shall commence on April 1, 2026, and conclude on September 30, 2026. This period is intended solely to align all permits with the City's standardized annual billing cycle of October 1 through September 30.

(2) Prorated Fees.

Notwithstanding any provision of this ordinance to the contrary, permit fees issued or renewed during the Billing Transitional Period shall be assessed on a prorated basis, reflecting the remaining portion of the fiscal year. Proration shall be applied as follows:

<u>Time Period</u>	<u>Percentage of Annual Permit Fee</u>
<u>Between April 1 and June 30</u>	<u>50%</u>
<u>Between July 1 and September 30</u>	<u>25%</u>

(3) Limitation of Application.

The prorated fee structure established in this section shall apply only during the Billing Transitional Period and shall not be applied in subsequent years.

(4) Standardized Renewal Cycle.

Effective October 1, 2026, all permits governed by this ordinance shall renew annually on October 1 at one hundred percent (100%) of the applicable fee, unless otherwise specified herein.

(5) Administrative Authority.

The Director of Environmental Services, or designee, is authorized to implement administrative procedures necessary to carry out the intent of this section, including

adjustments required to ensure equitable alignment of existing permits into the new billing cycle.

- (c) Term of issuance; Proration of fees. No Commercial Wastewater Discharge Permit (CWDP) shall be issued for a period of less than three months, except as otherwise determined by the Control Authority for operational or compliance purposes. The Control Authority may, at its discretion, issue a temporary, conditional, or provisional permit for a period of less than three months, as deemed appropriate to the circumstances.

For each newly permitted facility issued a CWDP during the permit year, which is not the renewal of an existing permit, a prorated portion of the annual permit fee shall be assessed based on the date of issuance, in accordance with the following schedule:

<u>Time Period</u>	<u>Percentage of Annual Permit Fee</u>
<u>Between October 1 and December 31</u>	<u>100%</u>
<u>Between January 1 and March 31</u>	<u>75%</u>
<u>Between April 1 and June 30</u>	<u>50%</u>
<u>Between July 1 and September 30</u>	<u>100% of the annual permit fee for the upcoming permit year</u>

*This proration structure shall not apply to permits issued for a duration of one week or less, if such permits are authorized by the Control Authority.

SECTION 4. That Section 23-139 of the Largo City Code is amended as follows:

Sec. 23-139. Commercial wastewater discharge user permit renewal.

- (a) ~~An application for permit renewal shall be submitted at least 60 days prior to the expiration date of the existing permit by each applicant wishing to continue discharging grease and other solid wastes from facilities located in the city's sanitary sewer service area. An application for permit renewal shall be submitted in accordance with deadlines established by the Control Authority to ensure continuous compliance within the City's Business Tax Receipt (BTR) cycle (October 1 through September 30). The Control Authority may establish prorated or transitional renewal requirements as necessary to implement this alignment.~~
- (b) Operating an establishment discharging grease and other prohibited wastes within the city's sanitary sewer service area without a permit is a violation of this article.
- (c) Food service establishments, commercial vehicle car washes/garages or commercial laundries operating without a current permit will be subject to permit fees for the amount specified in Table 23-136—Commercial Wastewater Discharge Rates and Fees.

SECTION 5. That Section 23-188 of the Largo City Code is amended as follows:

Sec. 23-188. Requirements—Permit application; fees.

- (a) *Privately owned collection and transmission system operating permit.* No person shall operate, permit, cause, allow, let, or suffer the operation of a privately owned collection and transmission system, or any facility, which will be reasonably expected to cause, or contribute to air, ground, or water pollution, without a valid operating permit issued by the control

authority, or be in violation of any condition, limitation, or restriction which is part of a valid operating permit.

- (b) *Permit application.* All owners of new and existing privately owned collection and transmission systems discharging to the city's sanitary sewer system shall complete and file, with the control authority, an operating permit application in the form prescribed by the city. An incomplete or inaccurate application will not be processed and will be returned to the applicant for revision.
- (1) Owners of existing privately owned collection and transmission systems, which are discharging wastewater into the city's WWRF and which wish to continue such discharges as of the promulgation date of the ordinance from which this article is derived, shall apply to the control authority for a privately owned collection and transmission system operating permit within 30 days of notification by the control authority.
 - (2) Owners of new privately owned collection and transmission systems intended to commence discharge of wastewater into the city's WWRF after the promulgation date of this article, shall apply to the control authority for a privately owned collection and transmission system operating permit at least 60 days prior to the date upon which any discharge to the city's sanitary sewer system will commence.
 - (3) The application for a privately owned collection and transmission system operating permit shall be complete and must contain the following elements in the format specified by the control authority:
 - a. The system owner's, ~~contact's~~ contacts, and system operator's name, mailing address, email address, and telephone number, and the physical location of the permitted system (if different from the owner's address).
 - b. A map depicting all pump stations, sewer pipes, sewer service areas, sewer subsystems, and/or manholes within the privately owned collection and transmission system.
 - c. The total length, expressed in linear feet, of gravity and/or pressure force mains. Measurements shall include pipe diameter and material (i.e., 100 feet of 4-inch PVC pipe).
 - d. Number and type of all individual service connections to the privately owned collection and transmission system.
 - e. Detailed operation and maintenance (O&M) procedures which shall include, but are not limited to:
 1. Preventative maintenance procedure pursuant to section 23-192(a).
 2. Spill containment and control procedures.
 3. Emergency response plan.
 4. A line jet cleaning program.
 5. A sanitary sewer overflow stabilization and remediation program.
 - (4) For purposes of compliance, a summary of all I&I evaluations and/or rehabilitative work performed between January 1, 1997, and the effective date of the ordinance from which this article is derived shall be submitted to the control authority in conjunction with the initial privately owned collection and transmission system operating permit application. The contents shall include:
 - a. A detailed outline evaluating rehabilitative work performed.
 - b. The I&I reduction results obtained as a result of the rehabilitative work.

- (5) Any other information as determined by the control authority to be necessary to evaluate the permit application.
- (c) Permit duration and renewal. ~~Permits shall be issued for a specified period not to exceed two years. The owner of the privately owned collection and transmission system shall submit a permit renewal application, pursuant to the provisions set forth in subsection (b) of this section, within a minimum of 60 days prior to the expiration of the existing permit. Permits shall be effective for a period of one year. Permits shall be aligned with the City's Business Tax Receipt (BTR) cycle (October 1 through September 30). The owner of the privately owned collection and transmission system shall submit a permit renewal application pursuant to subsection (b) of this section, in accordance with deadlines established by the Control Authority to maintain continuous compliance. The Control Authority may establish prorated or transitional permit terms as necessary to implement this alignment.~~
- (d) Permit fee rate. Permit fees are established to offset the administrative cost of implementing and maintaining this article and remain subject to revision upon approval by the city commission. ~~Permit fees are due annually and shall be submitted as invoiced by the control authority. The initial permit fee shall be paid with the submittal of the privately owned collection and transmission system operating permit application. Permit fees shall be assessed on an annual basis in alignment with the City's Business Tax Receipt (BTR) cycle (October 1 through September 30) and shall be submitted as invoiced by the Control Authority. The initial permit fee shall be paid at the time of the application, with subsequent renewals billed in accordance with the annual BTR cycle. Prorated fees may be applied during the transition period as determined by the Control Authority.~~ For those privately owned collection and transmission systems located within the city's sanitary sewer district but outside the city limits, an additional 25 percent surcharge fee shall be charged. The permit fees shall be assessed as follows:
- (1) Two hundred dollars per privately owned collection and transmission system.
 - (2) Two hundred dollars additional fee for collection and transmission systems with one or more pump station.
 - (3) Privately owned collection and transmission systems with lift stations serving more than one building shall be charged \$200.00 for the lift stations and \$200.00 for the private collection system.
 - (4) Fees and charges imposed under this Division are regulatory in nature and shall not be considered as taxes or business tax receipts. Accordingly, any exemptions, waivers, or reductions provided under other sections of the City Code, including those applicable to Business Tax Receipts (BTRs), shall not apply to fees or related charges in this section.
All permittees are required to pay applicable fees in full, without exception.
- (e) Billing Transitional Period. To facilitate implementation of the revised permitting and billing cycle, the City hereby establishes a one-time Billing Transitional Period.
- (1) Transitional Period Defined.
The Billing Transitional Period shall commence on April 1, 2026, and conclude on September 30, 2026. This period is intended solely to align all permits with the City's standardized annual billing cycle of October 1 through September 30.
 - (2) Prorated Fees.
Notwithstanding any provision of this ordinance to the contrary, permit fees issued or renewed during the Billing Transitional Period shall be assessed on a prorated basis, reflecting the remaining portion of the fiscal year. Proration shall be applied as follows:

<u>Time Period</u>	<u>Percentage of Annual Permit Fee</u>
<u>Between April 1 and June 30</u>	<u>50%</u>
<u>Between July 1 and September 30</u>	<u>25%</u>

(3) Limitation of Application.

The prorated fee structure established in this section shall apply only during the Billing Transitional Period and shall not be applied in subsequent years.

(4) Standardized Renewal Cycle.

Effective October 1, 2026, all permits governed by this ordinance shall renew annually on October 1 at one hundred percent (100%) of the applicable fee, unless otherwise specified herein.

(5) Administrative Authority.

The Director of Environmental Services, or designee, is authorized to implement administrative procedures necessary to carry out the intent of this section, including adjustments required to ensure equitable alignment of existing permits into the new billing cycle.

- (f) Term of issuance; Proration of fees. After the Billing Transitional Period described above has commenced, no privately owned collection and transmission system operating permit shall be issued for a period of less than three months, except as otherwise determined by the Control Authority for operational or compliance purposes. The Control Authority may, at its discretion, issue a temporary, conditional, or provisional permit for a period of less than three months, as deemed appropriate to the circumstances.

For each newly permitted facility issued an operating permit during the permit year, which is not the renewal of an existing permit, a prorated portion of the annual permit fee shall be assessed based on the date of issuance, in accordance with the following schedule:

<u>Time Period</u>	<u>Percentage of Annual Permit Fee</u>
<u>Between October 1 and December 31</u>	<u>100%</u>
<u>Between January 1 and March 31</u>	<u>75%</u>
<u>Between April 1 and June 30</u>	<u>50%</u>
<u>Between July 1 and September 30</u>	<u>100% of the annual permit fee for the upcoming permit year</u>

*This proration structure shall not apply to permits issued for a duration of one week or less, if such permits are authorized by the Control Authority.

(ge) Additional fees.

- (1) Fees for additional monitoring and ~~reinspections~~ reinspection in response to deficiencies noted in routine control authority inspections include charges of \$25.00 per employee hour.
- (2) Annual inspections requiring more than four employee hours to complete due to the size of the sanitary sewer system, shall result in fees of \$25.00 per employee hour after the initial four employee hour period.
- (3) All costs incurred by the control authority for materials needed to conduct routine or additional monitoring shall be charged to the collection and transmission system owner.
- (4) System owners shall be subject to reimburse the city for costs associated with enforcement actions taken against the city by regulatory agencies for violations caused in whole or in part by privately owned collection and transmission systems.

- (f) *Limitation on permit transfer.* Permits may be reassigned or transferred to a new owner and/or operator with prior approval of the control authority:
- (1) The permittee must give the control authority a minimum of 30 ~~days~~ days' advance written notice.
 - (2) The notice must include a written certification by the new owner which:
 - a. States the new owner acknowledges full responsibility for complying with the existing permit.
 - b. Identifies the specific date on which the transfer is to occur.
 - c. The new owner will provide a signed and sealed certification from a licensed professional engineer that the existing collection system capacity is sufficient for any additional flows anticipated with the new occupancy.

SECTION 6. That this ordinance shall take effect immediately upon its final passage and adoption.

SECTION 7. That it is the intention of the Largo City Commission that each provision hereof be considered severable, and, if any section, subsection, sentence, clause, or provision of this ordinance is held invalid, the remainder of the ordinance shall not be affected.

APPROVED ON FIRST READING _____

PASSED AND ADOPTED ON
SECOND AND FINAL READING _____

CITY OF LARGO, FLORIDA

Louis ("Woody") L. Brown, Mayor

REVIEWED AND APPROVED:

ATTEST:



Sarah L. Johnston, City Attorney

Diane Bruner, City Clerk

City of Largo Business Impact Estimate

This form should be included in the agenda packet for the item under which the proposed ordinance is to be considered and must be posted on the City's website by the time notice of the proposed ordinance is published.

Proposed ordinance's title/reference:

An Ordinance of the City of Largo, Florida, Amending Chapter 23 of the City Code of Ordinances to Update and Standardize Environmental Services Permitting and Fee Structures; Establishing a Uniform Annual Billing Cycle for Commercial Wastewater Discharge Permits (CWDP) and Privately Owned Collection and Transmission System (POCTS); Providing for Prorated Fees During a Transitional Period' and Providing for Severability and an Effective Date.

This Business Impact Estimate is provided in accordance with section 166.041(4), Florida Statutes.

Question 1. Does the proposed ordinance meet one or more of the exceptions listed below? If so, then please check the applicable exception below and move to Question 2. If one or more boxes are checked below, this means the City is of the view that a business impact estimate is not required by section 166.041(4), Florida Statutes, for the proposed ordinance. If there is no applicable exception, proceed with completing the business impact estimate at Question 3.

- The proposed ordinance is required for compliance with federal or state law or regulation;
- The proposed ordinance relates to the issuance or refinancing of debt;
- The proposed ordinance relates to the adoption of budgets or budget amendments, including revenue sources necessary to fund the budget;
- The proposed ordinance is required to implement a contract or an agreement, including, but not limited to, any federal, state, local, or private grant or other financial assistance accepted by the municipal government;
- The proposed ordinance is an emergency ordinance;
- The proposed ordinance relates to procurement; or
- The proposed ordinance is enacted to implement the following:
 - a. Development orders and development permits, as those terms are defined in section 163.3164, Florida Statutes, and development agreements, as authorized by the Florida Local Government Development Agreement Act under sections 163.3220-163.3243, Florida Statutes;
 - b. Comprehensive plan amendments and land development regulation amendments initiated by an application by a private party other than the City;
 - c. Sections 190.005 and 190.046, Florida Statutes, regarding community development districts;

- d. Section 553.73, Florida Statutes, relating to the Florida Building Code; or
- e. Section 633.202, Florida Statutes, relating to the Florida Fire Prevention Code.

Question 2. Based on the exception you selected above and in accordance with the provisions of the controlling law, please provide an explanation below of why the ordinance meets the exception(s).

N/A

Question 3. If there is no applicable exception, proceed with completing the below Business Impact Estimate. In accordance, the City hereby publishes the following information:

A. Summary of the proposed ordinance (must include a statement of the public purpose to be served by the proposed ordinance, such as serving the public health, safety, morals and welfare of the City):

The proposed ordinance amends Chapter 23 of the City of Largo Code of Ordinances to update and standardize permitting, billing, and fee structures for the Environmental Services programs governing Commercial Wastewater Discharge Permits (CWDP) and Privately Owned Collection and Transmission System (POCTS). The ordinance removes outdated and unimplemented billing provisions, including references to prior systems and anticipated utility billing integration, and implements a uniform annual billing cycle aligned with the City's Business Tax Receipt (BTR) period of October 1 through September 30.

The ordinance also establishes a one-time billing transitional period from April 1, 2026, through September 30, 2026, during which permit fees will be prorated to facilitate alignment with the new annual cycle. Beginning October 1, 2026, all applicable permits will renew annually at the full established fee. Additional updates clarify permit duration, renewal procedures, administrative authority, and confirm that all fees are regulatory in nature and not subject to exemptions or reductions otherwise provided in the City Code.

The public purpose of this ordinance is to promote the health, safety, and welfare by improving the regulation and oversight of wastewater discharges, ensuring the protection and integrity of the City's sanitary sewer system, and enhancing compliance with environmental standards. The ordinance further serves the public interest by increasing administrative efficiency, reducing billing inconsistencies and customer confusion, improving fee collection, and supporting the City's ability to effectively manage and enforce its Environmental Control Division.

B. An estimate of the direct economic impact of the proposed ordinance on private, for-profit businesses in the City, including the following, if any:

(1) An estimate of direct compliance costs that businesses may reasonably incur if the ordinance is enacted;

The proposed ordinance is not expected to impose significant new direct compliance costs on private, for-profit businesses. Businesses currently subject to Commercial Wastewater Discharge Permits (CWDP) and/or Privately Owned Collection and Transmission System (POCTS) permits are already required to obtain permits and pay associated regulatory fees.

Any minor compliance costs are expected to be administrative in nature, such as internal adjustments to account for the new annual billing cycle (October 1 through September 30), updating accounting practices, and aligning payment schedules.

During the one-time Billing Transitional Period (April 1, 2026, through September 30, 2026), businesses may experience prorated permit fees; however, these are proportional adjustments rather than new or increased costs.

(2) Identification of any new charge or fee on businesses subject to the proposed ordinance, or for which businesses will be financially responsible; and

The proposed ordinance does not create any new charges or fees. All fees associated with CWDP and POCTS permits are existing regulatory fees already adopted by the City.

The ordinance standardizes the timing and administration of these fees by implementing a uniform annual billing cycle and establishing prorated fees during the transition period. While the structure and timing of these payments will change, the ordinance does not increase fee amounts or introduce new financial obligations beyond those already required for permit holders.

(3) An estimate of the City's regulatory costs, including an estimate of revenues from any new charges or fees that will be imposed on businesses to cover such costs.

The City may incur minor administrative costs associated with implementing the updated billing structure, including system configuration within the new permitting platform, staff training, customer outreach, and public education efforts. These costs are expected to be absorbed within existing departmental budgets and resources.

No new regulatory programs are created by this ordinance. Therefore, no new revenue sources are introduced. The ordinance is expected to improve the consistency and timing of existing revenue collection by reducing delinquencies, minimizing billing errors, and aligning permit cycles. Overall, revenues are expected to remain stable, with potential modest increases attributable to improved compliance and collection efficiency rather than fee increases.

(4) Any other direct economic impacts of the proposed ordinance on private, for-profit businesses in the City that are not covered by (1), (2), or (3):

The ordinance is expected to have a positive operational impact on businesses by simplifying and standardizing billing and renewal processes. Aligning Environmental Services permits with the City's Business Tax Receipt (BTR) cycle allows businesses to consolidate payments into a single, predictable annual timeframe, improving financial planning and reducing administrative complexity.

Additionally, increased clarity in billing and renewal requirements may reduce the likelihood of missed payments, late fees, or enforcement actions. The improved transparency and consistency are expected to benefit businesses by making regulatory obligations easier to understand and manage.

No direct adverse economic impacts to private, for-profit businesses are anticipated beyond minor administrative adjustments associated with the transition to the new billing structure.

C. Good faith estimate of the number of businesses likely to be impacted by the ordinance:

Based on current Environmental Services records, it is estimated that approximately 150 to 250 private, for-profit businesses within the City of Largo will be directly impacted by the proposed ordinance. This estimate includes businesses that are currently permitted under the Commercial Wastewater Discharge Permit (CWDP) program, as well as entities operating Privately Owned Collection and Transmission Systems (POCTS). The Range reflects normal fluctuations in permitting activity, including new business establishments, closures, and changes in permit status.

All impacted businesses are already subject to existing permitting requirements, and therefore, the ordinance will primarily affect the timing and administration of billing rather than expanding the number of regulated entities.

D. Additional information the governing body deems useful (what steps did the City take to answer A, B, and C?):

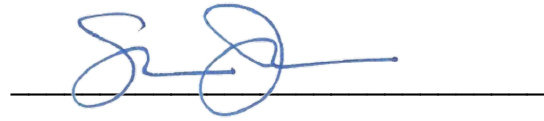
In developing the Business Impact Estimate, the City relied on a combination of internal data, interdepartmental coordination, and programmatic review. Environmental Services staff conducted an evaluation of existing permit records for Commercial Wastewater Discharge Permits (CWDP) and Privately Owned Collection and Transmission System (POCTS) to estimate the number and type of businesses currently subject to regulation. Historical billing data and account records were also reviewed to assess typical payment amounts, billing frequency, and patterns of compliance.

Staff further analyzed the operational differences between the current and proposed billing structures to identify any potential changes in financial obligations or administrative requirements for businesses. This included reviewing the transition from multiple billing cycles to a single annual cycle aligned with the Business Tax Receipt (BTR) period, as well as the implementation of prorated fees during the defined transition period.

Environmental Services staff also coordinated with the Finance Department, Community Development Department, and Information Technology staff to evaluate system capabilities, administrative costs, and anticipated efficiencies associated with the implementation of the new Licensing and Permitting platform. These discussions helped inform estimates related to regulatory costs, revenue impacts, and process improvements.

Finally, the City considered customer service experience, including common sources of confusion, billing disputes, and delinquency issues under the existing system, to assess the likely operational and economic effects on businesses. Based on this comprehensive review, the City determined that the proposed ordinance will not impose new fees and will have minimal direct economic impact, while providing improved clarity, consistency, and administrative efficiency for both businesses and the City.

Reviewed and Approved:

A handwritten signature in blue ink is written over a solid horizontal black line. The signature consists of several loops and a long horizontal stroke extending to the right.

City Attorney's Office