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DOCKET NO.: 950495-WS - [Southern States Utilities, Inc. - Beacon Hills/Cobblestone Water System, Woodmere Water System, Keystone Heights Water System, Lakeview Villas Water System, Postmaster Village Water System, Amelia Island Water System, Palm Valley Water System, Remington Forest Water System, Beecher's Point Water System, Hermits Cove Water System, Interlachen Lakes Estates/Park Manor Water System, Palm Port Water System, Pomona Park Water System, River Grove Water System, Silver Lake Oaks Water System, John's Highlands Water System, Welaka/Saratoga Harbour Water System, Wootens Water System, Geneva Lake Estates Water System, Keystone Club Estates Water System]

WITNESS: Direct Testimony of Blanca R. Rodriguez, Florida Department of Environmental Protection, Appearing on Behalf of the Staff of the Florida Public Service Commission

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DIRECT TESTIMONY OF BLANCA R. RODRIGUEZ

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Q. Please state your name and business address.

A. Blanca R. Rodriguez, 7825 Baymeadows Way - B200, Jacksonville, Florida 32256.

Q. Please state a brief description of your educational background and experience.

A. I am an environmental manager, supervising the Drinking Water Section. I have a Bachelors Degree in Chemical Engineering and 19 years experience as an engineer. I have 11 years of experience as an engineer in the Potable Water Section with the Department.

Q. By whom are you presently employed?

A. I am employed by the Florida Department of Environmental Protection. (FDEP)

Q. How long have you been employed with the FDEP and in what capacity?

A. I have been employed by FDEP during the last 11 years as an engineer. Right now, I am an environmental manager supervising the Drinking Water Section.

Q. What are your general responsibilities at the FDEP?

A. I supervise 11 people in the Drinking Water Section. I am responsible for the permitting, compliance and enforcement activities for the Public Water Systems in FDEP's Northeast District.

Q. Are you familiar with the Southern States Utilities, Inc. water systems located in the Northeast District?

A. Yes.

Q. Were these systems inspected by you, or by staff under your supervision?

1 A. Yes.

2 Beacon Hills/Cobblestone Water System

3 Q. Does the utility have a current construction permits from the FDEP for
4 Beacon Hills/Cobblestone Water System (Beacon Hills/Cobblestone)?

5 A. Yes. For Beacon Hills, Permit No. 1695-WD-3301, issued July 6, 1995 for
6 Water Main Relocation and Permit No. 1695-WD-3311, issued June 30, 1995 for
7 the Corrosion Control System. For Cobblestone, Permit No. 1695-WD-3210,
8 issued March 22, 1995 for Chlorination System Improvements and Permit No.
9 1695-WD-3312, issued June 30, 1995 for the Corrosion Control System.

10 Q. Are the utility's treatment facilities and distribution system
11 sufficient to serve its present customers?

12 A. Yes. However, the utility was advised in a September 26, 1995 letter
13 that corrosion control treatment needs to be implemented for the Cobblestone
14 facilities. According to the utility, it planned to implement the changes by
15 the end of November. Copies of those letters are attached as Exhibit BRR-1.

16 Q. Does the utility maintain the required 20 psi minimum pressure
17 throughout the distribution system?

18 A. Yes.

19 Q. Does the utility have an adequate auxiliary power source in the event
20 of a power outage?

21 A. Yes.

22 Q. Are the utility's water wells for Beacon Hills/Cobblestone located in
23 compliance with Rule 62-555, Florida Administrative Code?

24 A. Yes.

25 Q. Does the utility have certified operators as required by Rule 61E12-41,

1 | Florida Administrative Code?

2 | A. Yes.

3 | Q. Has the utility established a cross-connection control program in
4 | accordance with Rule 62-555.360, Florida Administrative Code?

5 | A. Yes, according to a letter dated June 30, 1994.

6 | Q. Is the overall maintenance of the treatment plant and distribution
7 | facilities satisfactory?

8 | A. Yes.

9 | Q. Does the water produced by the utility meet the State and Federal
10 | maximum contaminant levels for primary and secondary water quality standards?

11 | A. Yes. However, the Beacon Hills water treatment plant area exceeded the
12 | lead action level indicated in Rule 62-551, Florida Administrative Code, and
13 | the Cobblestone water treatment plant area exceeded the copper action level.
14 | Documentation concerning the lead and copper levels are attached as Exhibit
15 | BRR-2. This situation is still being evaluated by the Duval County Health
16 | Department at the time of the filing of this testimony. FDEP has delegated
17 | regulation of public water systems in Duval County to FDHRS.

18 | Q. Does the utility monitor the organic contaminants listed in Rule
19 | 62-550.410, Florida Administrative Code?

20 | A. Yes.

21 | Q. Do recent chemical analyses of raw and finished water, when compared to
22 | regulations, suggest the need for additional treatment?

23 | A. Yes. FDEP rules regarding lead and copper call for corrosion control
24 | treatment.

25 | Q. Does the utility maintain the required chlorine residual or its

1 | equivalent throughout the distribution system?

2 | A. Yes. Exhibit BRR-1 regarding high chlorine complaints and the utility's
3 | resolution.

4 | Q. Are the plant and distribution systems in compliance with all the other
5 | provisions of Chapter 62, Florida Administrative Code, not previously
6 | mentioned?

7 | A. Yes.

8 | Q. Has Beacon Hills/Cobblestone been the subject of any FDEP enforcement
9 | action within the past two years?

10 | A. None. However, as indicated in Exhibit BRR-2, the utility was issued
11 | an April 26, 1995 compliance letter for lack of public education for exceeding
12 | lead action levels.

13 | Woodmere Water System

14 | Q. Does the utility have an active construction permit from the FDEP for
15 | the Woodmere Water System (Woodmere)?

16 | A. No, there are no active permits.

17 | Q. Are the utility's treatment facilities and distribution system
18 | sufficient to serve its present customers?

19 | A. Yes. However, the chlorine contact time is minimal resulting in
20 | chlorine residual variations in the distribution system. We recommend that
21 | a 15 minute contact time at maximum hour flow be provided.

22 | Q. Does the utility maintain the required 20 psi minimum pressure
23 | throughout the distribution system?

24 | A. Yes.

25 | Q. Does the utility have an adequate auxiliary power source in the event

1 | of a power outage?
2 | A. Yes.
3 | Q. Are the utility's water wells for Woodmere located in compliance with
4 | Rule 62-555, Florida Administrative Code?
5 | A. Yes.
6 | Q. Does the utility have certified operators as required by Rule 61E12-41,
7 | Florida Administrative Code?
8 | A. Yes.
9 | Q. Has the utility established a cross-connection control program in
10 | accordance with Rule 62-555.360, Florida Administrative Code?
11 | A. Yes. A written copy of the utility's compliance is on file.
12 | Q. Is the overall maintenance of the treatment plant and distribution
13 | facilities satisfactory?
14 | A. Yes.
15 | Q. Does the water produced by the utility meet the State and Federal
16 | maximum contaminant levels for primary and secondary water quality standards?
17 | A. Yes.
18 | Q. Does the utility monitor the organic contaminants listed in Rule
19 | 62-550.410, Florida Administrative Code?
20 | A. Yes.
21 | Q. Do recent chemical analyses of raw and finished water, when compared to
22 | regulations, suggest the need for additional treatment?
23 | A. No.
24 | Q. Does the utility maintain the required chlorine residual or its
25 | equivalent throughout the distribution system?

1 | A. Yes.

2 | Q. Are the plant and distribution systems in compliance with all the other
3 | provisions of Chapter 62, Florida Administrative Code, not previously
4 | mentioned?

5 | A. Yes. With the exception of one aeration/ground storage tank taken off
6 | line in February, 1993 without authorization from this office.

7 | Q. Has Woodmere been the subject of any FDEP enforcement action within the
8 | past two years?

9 | A. No.

10 | Keystone Heights Water System

11 | Q. Does the utility have a current construction permit from the FDEP for
12 | Keystone Heights Water System (Keystone Heights)?

13 | A. No.

14 | Q. Are the utility's treatment facilities and distribution system
15 | sufficient to serve its present customers?

16 | A. Yes. However, Well #2 is still offline and is needed during peak
17 | months.

18 | Q. Does the utility maintain the required 20 psi minimum pressure
19 | throughout the distribution system?

20 | A. Yes.

21 | Q. Does the utility have an adequate auxiliary power source in the event
22 | of a power outage?

23 | A. Yes, at Plant #3. This site has a portable generator sufficient to run
24 | well pumps and treatment. However, we would recommend that this site provide
25 | permanent generator with an automatic switch-on.

1 Q. Are the utility's water wells for Keystone Heights located in compliance
2 with Rule 62-555, Florida Administrative Code?

3 A. Yes. However, one well located within 200 feet of ground contamination
4 from underground storage facilities for gasoline.

5 Q. Does the utility have certified operators as required by Rule 61E12-41,
6 Florida Administrative Code?

7 A. Yes.

8 Q. Has the utility established a cross-connection control program in
9 accordance with Rule 62-555.360, Florida Administrative Code?

10 A. Yes, a plan exists according to AWWA standards and a copy of the written
11 plan is being provided.

12 Q. Is the overall maintenance of the treatment plant and distribution
13 facilities satisfactory?

14 A. Yes.

15 Q. Does the water produced by the utility meet the State and Federal
16 maximum contaminant levels for primary and secondary water quality standards?

17 A. Yes.

18 Q. Does the utility monitor the organic contaminants listed in Rule
19 62-550.410, Florida Administrative Code?

20 A. Yes.

21 Q. Do recent chemical analyses of raw and finished water, when compared to
22 regulations, suggest the need for additional treatment?

23 A. No.

24 Q. Does the utility maintain the required chlorine residual or its
25 equivalent throughout the distribution system?

1 A. Yes.

2 Q. Are the plant and distribution systems in compliance with all the other
3 provisions of Chapter 62, Florida Administrative Code, not previously
4 mentioned?

5 A. Yes. All gas chlorine facilities have alarm and buzzer and no
6 telemetry. However, all gas systems will be removed by December 1995. Well
7 #2 is still off line. Bacteriological clearance for the well has not been
8 achieved since work was performed on well and well pump in 1994.

9 Q. Has Keystone Heights been the subject of any FDEP enforcement action
10 within the past two years?

11 A. No.

12 Lakeview Villas Water System

13 Q. Does the utility have a current construction permit from the FDEP for
14 Lakeview Villas Water System (Lakeview Villas)?

15 A. No.

16 Q. Are the utility's treatment facilities and distribution system
17 sufficient to serve its present customers?

18 A. Yes.

19 Q. Does the utility maintain the required 20 psi minimum pressure
20 throughout the distribution system?

21 A. Yes.

22 Q. Does the utility have an adequate auxiliary power source in the event
23 of a power outage?

24 A. Because the Lakeview Villas' system has fewer than 350 people and 150
25 connections, it has a portable generator that can be connected in emergency.

1 Q. Are the utility's water wells for Lakeview Villas located in compliance
2 with Rule 62-555, Florida Administrative Code?

3 A. Yes. The well may be within 200 feet of a nearby septic system.
4 However, - 175 feet is maximum distance and no bacteriological problems have
5 occurred.

6 Q. Does the utility have certified operators as required by Rule 61E12-41,
7 Florida Administrative Code?

8 A. Yes.

9 Q. Has the utility established a cross-connection control program in
10 accordance with Rule 62-555.360, Florida Administrative Code?

11 A. Yes, a plan exists according to AWWA standards, and a copy of the
12 written plan is being provided.

13 Q. Is the overall maintenance of the treatment plant and distribution
14 facilities satisfactory?

15 A. Yes.

16 Q. Does the water produced by the utility meet the State and Federal
17 maximum contaminant levels for primary and secondary water quality standards?

18 A. Yes.

19 Q. Does the utility monitor the organic contaminants listed in Rule
20 62-550.410, Florida Administrative Code?

21 A. Because Lakeview Villas' has fewer than 150 connections a waiver has
22 been issued and no samples are required at this time.

23 Q. Do recent chemical analyses of raw and finished water, when compared to
24 regulations, suggest the need for additional treatment?

25 A. No.

1 Q. Does the utility maintain the required chlorine residual or its
2 equivalent throughout the distribution system?
3 A. Yes.
4 Q. Are the plant and distribution systems in compliance with all the other
5 provisions of Chapter 62, Florida Administrative Code, not previously
6 mentioned?
7 A. Yes.
8 Q. Has Lakeview Villas been the subject of any FDEP enforcement action
9 within the past two years?
10 A. No.
11 Postmaster Village Water System
12 Q. Does the utility have a current construction permit from the FDEP for
13 Postmaster Village Water System (Postmaster Village)?
14 A. Yes.
15 Q. Are the utility's treatment facilities and distribution system
16 sufficient to serve its present customers?
17 A. Yes.
18 Q. Does the utility maintain the required 20 psi minimum pressure
19 throughout the distribution system?
20 A. Yes.
21 Q. Does the utility have an adequate auxiliary power source in the event
22 of a power outage?
23 A. Yes.
24 Q. Are the utility's water wells for Postmaster Village located in
25 compliance with Rule 62-555, Florida Administrative Code?

1 | A. Yes.

2 | Q. Does the utility have certified operators as required by Rule 61E12-41,
3 | Florida Administrative Code?

4 | A. Yes.

5 | Q. Has the utility established a cross-connection control program in
6 | accordance with Rule 62-555.360, Florida Administrative Code?

7 | A. Yes, a plan exists according to AWWA standards, and a copy is being
8 | submitted for review.

9 | Q. Is the overall maintenance of the treatment plant and distribution
10 | facilities satisfactory?

11 | A. Yes.

12 | Q. Does the water produced by the utility meet the State and Federal
13 | maximum contaminant levels for primary and secondary water quality standards?

14 | A. Yes.

15 | Q. Does the utility monitor the organic contaminants listed in Rule
16 | 62-550.410, Florida Administrative Code?

17 | A. Yes.

18 | Q. Do recent chemical analyses of raw and finished water, when compared to
19 | regulations, suggest the need for additional treatment?

20 | A. No.

21 | Q. Does the utility maintain the required chlorine residual or its
22 | equivalent throughout the distribution system?

23 | A. Yes.

24 | Q. Are the plant and distribution systems in compliance with all the other
25 | provisions of Chapter 62, Florida Administrative Code, not previously

1 | mentioned?

2 | A. Yes.

3 | Q. Has Postmaster Village been the subject of any Department of
4 | Environmental Protection enforcement action within the past two years?

5 | A. No.

6 | Amelia Island Water System

7 | Q. Does the utility have a current construction permit from the FDEP for
8 | the Amelia Island Water System (Amelia Island)?

9 | A. Yes.

10 | Q. Are the utility's treatment facilities and distribution system
11 | sufficient to serve its present customers?

12 | A. Yes.

13 | Q. Does the utility maintain the required 20 psi minimum pressure
14 | throughout the distribution system?

15 | A. Yes.

16 | Q. Does the utility have an adequate auxiliary power source in the event
17 | of a power outage?

18 | A. Yes.

19 | Q. Are the utility's water wells for Amelia Island located in compliance
20 | with Rule 62-555, Florida Administrative Code?

21 | A. Yes.

22 | Q. Does the utility have certified operators as required by Rule 61E12-41,
23 | Florida Administrative Code?

24 | A. Yes.

25 | Q. Has the utility established a cross-connection control program in

1 | accordance with Rule 62-555.360, Florida Administrative Code?
2 | A. Yes.
3 | Q. Is the overall maintenance of the treatment plant and distribution
4 | facilities satisfactory?
5 | A. Yes.
6 | Q. Does the water produced by the utility meet the State and Federal
7 | maximum contaminant levels for primary and secondary water quality standards?
8 | A. Yes.
9 | Q. Does the utility monitor the organic contaminants listed in Rule
10 | 62-550.410, Florida Administrative Code?
11 | A. Yes.
12 | Q. Do recent chemical analyses of raw and finished water, when compared to
13 | regulations, suggest the need for additional treatment?
14 | A. No.
15 | Q. Does the utility maintain the required chlorine residual or its
16 | equivalent throughout the distribution system?
17 | A. Yes.
18 | Q. Are the plant and distribution systems in compliance with all the other
19 | provisions of Chapter 62, Florida Administrative Code, not previously
20 | mentioned?
21 | A. Yes.
22 | Q. Has Amelia Island been the subject of any FDEP enforcement action within
23 | the past two years?
24 | A. No.
25 |

Palm Valley Water System

1 Q. Does the utility have a current construction permit from the FDEP for
2 Palm Valley Water System (Palm Valley)?

3 A. No. Palm Valley is a consecutive water system with distribution
4 facilities only.

5 Q. Are the utility's treatment facilities and distribution system
6 sufficient to serve its present customers?

7 A. Yes. Water mains were replaced and upgraded in 1992 and 1993.
8 Interconnection to Intercoastal Utilities was made in 1993.

9 Q. Does the utility maintain the required 20 psi minimum pressure
10 throughout the distribution system?

11 A. Yes.

12 Q. Does the utility have an adequate auxiliary power source in the event
13 of a power outage?

14 A. Yes. Intercoastal Utilities has sufficient auxiliary power.

15 Q. Are the utility's water wells for Palm Valley located in compliance with
16 Rule 62-555, Florida Administrative Code?

17 A. The utility has no wells as it has interconnected with Intercoastal
18 Utilities.

19 Q. Does the utility have certified operators as required by Rule 61E12-41,
20 Florida Administrative Code?

21 A. Yes.

22 Q. Has the utility established a cross-connection control program in
23 accordance with Rule 62-555.360, Florida Administrative Code?

24 A. Intercoastal Utilities has a cross connection control plan.

25 Q. Is the overall maintenance of the treatment plant and distribution

1 facilities satisfactory?

2 A. Yes.

3 Q. Does the water produced by the utility meet the State and Federal
4 maximum contaminant levels for primary and secondary water quality standards?

5 A. Yes.

6 Q. Does the utility monitor the organic contaminants listed in Rule
7 62-550.410, Florida Administrative Code?

8 A. Yes. Intercoastal Utilities, the supplier of water, monitors for
9 contaminants.

10 Q. Do recent chemical analyses of raw and finished water, when compared to
11 regulations, suggest the need for additional treatment?

12 A. No.

13 Q. Does the utility maintain the required chlorine residual or its
14 equivalent throughout the distribution system?

15 A. Yes.

16 Q. Are the plant and distribution systems in compliance with all the other
17 provisions of Chapter 62, Florida Administrative Code, not previously
18 mentioned?

19 A. Yes.

20 Q. Has Palm Valley been the subject of any FDEP enforcement action within
21 the past two years?

22 A. No.

23 Remington Forest Water System

24 Q. Does the utility have a current construction permit from the FDEP for
25 Remington Forest Water System (Remington Forest)?

1 | A. No.

2 | Q. Are the utility's treatment facilities and distribution system
3 | sufficient to serve its present customers?

4 | A. Yes.

5 | Q. Does the utility maintain the required 20 psi minimum pressure
6 | throughout the distribution system?

7 | A. Yes.

8 | Q. Does the utility have an adequate auxiliary power source in the event
9 | of a power outage?

10 | A. No. The Remington Forest facility does not meet the population/
11 | connection requirements to require auxiliary power.

12 | Q. Are the utility's water wells for Remington Forest located in compliance
13 | with Rule 62-555, Florida Administrative Code?

14 | A. Yes.

15 | Q. Does the utility have certified operators as required by Rule 61E12-41,
16 | Florida Administrative Code?

17 | A. Yes.

18 | Q. Has the utility established a cross-connection control program in
19 | accordance with Rule 62-555.360, Florida Administrative Code?

20 | A. Yes.

21 | Q. Is the overall maintenance of the treatment plant and distribution
22 | facilities satisfactory?

23 | A. Yes.

24 | Q. Does the water produced by the utility meet the State and Federal
25 | maximum contaminant levels for primary and secondary water quality standards?

1 | A. Yes.

2 | Q. Does the utility monitor the organic contaminants listed in Rule
3 | 62-550.410, Florida Administrative Code?

4 | A. Yes.

5 | Q. Do recent chemical analyses of raw and finished water, when compared to
6 | regulations, suggest the need for additional treatment?

7 | A. No.

8 | Q. Does the utility maintain the required chlorine residual or its
9 | equivalent throughout the distribution system?

10 | A. Yes.

11 | Q. Are the plant and distribution systems in compliance with all the other
12 | provisions of Chapter 62, Florida Administrative Code, not previously
13 | mentioned?

14 | A. Yes.

15 | Q. Has Remington Forest been the subject of any FDEP enforcement action
16 | within the past two years?

17 | A. No.

18 | Beecher's Point Water System

19 | Q. Does the utility have a current construction permit from the FDEP for
20 | Beecher's Point Water System (Beecher's Point)?

21 | A. No.

22 | Q. Are the utility's treatment facilities and distribution system
23 | sufficient to serve its present customers?

24 | A. Yes. This is a consecutive water system, with the town of Welaka's
25 | water treatment plant as the primary system.

1 Q. Does the utility maintain the required 20 psi minimum pressure
2 throughout the distribution system?
3 A. Yes.
4 Q. Does the utility have an adequate auxiliary power source in the event
5 of a power outage?
6 A. Yes.
7 Q. Are the water wells located at Beecher's Point in compliance with Rule
8 62-555, Florida Administrative Code?
9 A. Yes. These wells are connected to the town of Welaka.
10 Q. Does the utility have certified operators as required by Rule 61E12-41,
11 Florida Administrative Code?
12 A. Yes.
13 Q. Has the utility established a cross-connection control program in
14 accordance with Rule 62-555.360, Florida Administrative Code?
15 A. Yes. SSU established one program for all of its systems.
16 Q. Is the overall maintenance of the treatment plant and distribution
17 facilities satisfactory?
18 A. Yes.
19 Q. Does the water produced by the utility meet the State and Federal
20 maximum contaminant levels for primary and secondary water quality standards?
21 A. Yes.
22 Q. Does the utility monitor the organic contaminants listed in Rule
23 62-550.410, Florida Administrative Code?
24 A. Yes. Through the Welaka water treatment plant.
25 Q. Do recent chemical analyses of raw and finished water, when compared to

1 regulations, suggest the need for additional treatment?

2 A. No.

3 Q. Does the utility maintain the required chlorine residual or its
4 equivalent throughout the distribution system?

5 A. Yes.

6 Q. Are the plant and distribution systems in compliance with all the other
7 provisions of Chapter 62, Florida Administrative Code, not previously
8 mentioned?

9 A. Yes.

10 Q. Has Beecher's Point been the subject of any FDEP enforcement action
11 within the past two years?

12 A. No.

13 Hermits Cove Water System

14 Q. Does the utility have a current construction permit from the FDEP for
15 Hermits Cove Water System (Hermits Cove)?

16 A. No.

17 Q. Are the utility's treatment facilities and distribution system
18 sufficient to serve its present customers?

19 A. Yes.

20 Q. Does the utility maintain the required 20 psi minimum pressure
21 throughout the distribution system?

22 A. Yes.

23 Q. Does the utility have an adequate auxiliary power source in the event
24 of a power outage?

25 A. Yes.

1 Q. Are the utility's water wells for Hermits Cove located in compliance
2 with Rule 62-555, Florida Administrative Code?
3 A. Yes.
4 Q. Does the utility have certified operators as required by Rule 61E12-41,
5 Florida Administrative Code?
6 A. Yes.
7 Q. Has the utility established a cross-connection control program in
8 accordance with Rule 62-555.360, Florida Administrative Code?
9 A. Yes.
10 Q. Is the overall maintenance of the treatment plant and distribution
11 facilities satisfactory?
12 A. Yes.
13 Q. Does the water produced by the utility meet the State and Federal
14 maximum contaminant levels for primary and secondary water quality standards?
15 A. Yes.
16 Q. Does the utility monitor the organic contaminants listed in Rule
17 62-550.410, Florida Administrative Code?
18 A. Yes.
19 Q. Do recent chemical analyses of raw and finished water, when compared to
20 regulations, suggest the need for additional treatment?
21 A. No.
22 Q. Does the utility maintain the required chlorine residual or its
23 equivalent throughout the distribution system?
24 A. Yes.
25 Q. Are the plant and distribution systems in compliance with all the other

1 | provisions of Chapter 62, Florida Administrative Code, not previously
2 | mentioned?

3 | A. Yes.

4 | Q. Has Hermits Cove been the subject of any FDEP enforcement action within
5 | the past two years?

6 | A. No.

7 | Interlachen Lakes Estates/Park Manor Water System

8 | Q. Does the utility have a current construction permit from the FDEP for
9 | the Interlachen Lakes Estates/Park Manor Water System (Interlachen Lakes
10 | Estates/Park Manor)?

11 | A. No.

12 | Q. Are the utility's treatment facilities and distribution system
13 | sufficient to serve its present customers?

14 | A. Yes.

15 | Q. Does the utility maintain the required 20 psi minimum pressure
16 | throughout the distribution system?

17 | A. Yes.

18 | Q. Does the utility have an adequate auxiliary power source in the event
19 | of a power outage?

20 | A. Yes.

21 | Q. Are the utility's water wells for Interlachen Lakes Estates/Park Manor
22 | located in compliance with Rule 62-555, Florida Administrative Code?

23 | A. Yes.

24 | Q. Does the utility have certified operators as required by Rule 61E12-41,
25 | Florida Administrative Code?

1 A. Yes.

2 Q. Has the utility established a cross-connection control program in
3 accordance with Section 62-555.360, Florida Administrative Code?

4 A. Yes. It is a utility-wide program.

5 Q. Is the overall maintenance of the treatment plant and distribution
6 facilities satisfactory?

7 A. Yes.

8 Q. Does the water produced by the utility meet the State and Federal
9 maximum contaminant levels for primary and secondary water quality standards?

10 A. Yes.

11 Q. Does the utility monitor the organic contaminants listed in Rule
12 62-550.410, Florida Administrative Code?

13 A. Yes.

14 Q. Do recent chemical analyses of raw and finished water, when compared to
15 regulations, suggest the need for additional treatment?

16 A. No.

17 Q. Does the utility maintain the required chlorine residual or its
18 equivalent throughout the distribution system?

19 A. Yes.

20 Q. Are the plant and distribution systems in compliance with all the other
21 provisions of Chapter 62, Florida Administrative Code, not previously
22 mentioned?

23 A. Yes.

24 Q. Has Interlachen Lakes Estates/Park Manor been the subject of any FDEP
25 enforcement action within the past two years?

1 | A. No.

2 | Palm Port Water System

3 | Q. Does the utility have a current construction permit from the FDEP for

4 | Palm Port Water System (Palm Port)?

5 | A. Yes, a general permit for corrosion control.

6 | Q. Are the utility's treatment facilities and distribution system

7 | sufficient to serve its present customers?

8 | A. Yes.

9 | Q. Does the utility maintain the required 20 psi minimum pressure

10 | throughout the distribution system?

11 | A. Yes.

12 | Q. Does the utility have an adequate auxiliary power source in the event

13 | of a power outage?

14 | A. No. Auxiliary power is not required due to the system's size.

15 | Q. Are the utility's water wells for Palm Port located in compliance with

16 | Rule 62-555, Florida Administrative Code?

17 | A. Yes.

18 | Q. Does the utility have certified operators as required by Rule 61E12-41,

19 | Florida Administrative Code?

20 | A. Yes.

21 | Q. Has the utility established a cross-connection control program in

22 | accordance with Rule 62-555.360, Florida Administrative Code?

23 | A. Yes. It is a utility-wide program.

24 | Q. Is the overall maintenance of the treatment plant and distribution

25 | facilities satisfactory?

1 | A. Yes.

2 | Q. Does the water produced by the utility meet the State and Federal
3 | maximum contaminant levels for primary and secondary water quality standards?

4 | A. Yes.

5 | Q. Does the utility monitor the organic contaminants listed in Rule
6 | 62-550.410, Florida Administrative Code?

7 | A. No. There is a waiver due to the utility's size.

8 | Q. Do recent chemical analyses of raw and finished water, when compared to
9 | regulations, suggest the need for additional treatment?

10 | A. No.

11 | Q. Does the utility maintain the required chlorine residual or its
12 | equivalent throughout the distribution system?

13 | A. Yes.

14 | Q. Are the plant and distribution systems in compliance with all the other
15 | provisions of Chapter 62, Florida Administrative Code, not previously
16 | mentioned?

17 | A. Yes.

18 | Q. Has Palm Port been the subject of any FDEP enforcement action within the
19 | past two years?

20 | A. No.

21 | Pomona Park Water System

22 | Q. Does the utility have a current construction permit from the FDEP for
23 | Pomona Park Water System (Pomona)?

24 | A. No.

25 | Q. Are the utility's treatment facilities and distribution system

1 | sufficient to serve its present customers?

2 | A. Yes.

3 | Q. Does the utility maintain the required 20 psi minimum pressure

4 | throughout the distribution system?

5 | A. Yes.

6 | Q. Does the utility have an adequate auxiliary power source in the event

7 | of a power outage?

8 | A. Yes.

9 | Q. Are the utility's water wells for Pomona Park located in compliance with

10 | Rule 62-555, Florida Administrative Code?

11 | A. Yes.

12 | Q. Does the utility have certified operators as required by Rule 61E12-41,

13 | Florida Administrative Code?

14 | A. Yes.

15 | Q. Has the utility established a cross-connection control program in

16 | accordance with Rule 62-555.360, Florida Administrative Code?

17 | A. Yes. It is a utility-wide program.

18 | Q. Is the overall maintenance of the treatment plant and distribution

19 | facilities satisfactory?

20 | A. Yes.

21 | Q. Does the water produced by the utility meet the State and Federal

22 | maximum contaminant levels for primary and secondary water quality standards?

23 | A. Yes.

24 | Q. Does the utility monitor the organic contaminants listed in Rule

25 | 62-550.410, Florida Administrative Code?

1 A. Yes.

2 Q. Do recent chemical analyses of raw and finished water, when compared to
3 regulations, suggest the need for additional treatment?

4 A. No.

5 Q. Does the utility maintain the required chlorine residual or its
6 equivalent throughout the distribution system?

7 A. Yes.

8 Q. Are the plant and distribution systems in compliance with all the other
9 provisions of Chapter 62, Florida Administrative Code, not previously
10 mentioned?

11 A. Yes.

12 Q. Has Pomona Park been the subject of any FDEP enforcement action within
13 the past two years?

14 A. No.

15 River Grove Water System

16 Q. Does the utility have a current construction permit from the FDEP for
17 River Grove Water System (River Grove)?

18 A. Yes, a general permit for corrosion control.

19 Q. Are the utility's treatment facilities and distribution system
20 sufficient to serve its present customers?

21 A. Yes.

22 Q. Does the utility maintain the required 20 psi minimum pressure
23 throughout the distribution system?

24 A. Yes.

25 Q. Does the utility have an adequate auxiliary power source in the event

1 | of a power outage?

2 | A. No. Due to River Grove's size, auxiliary power is not required.

3 | Q. Are the utility's water wells for River Grove located in compliance with

4 | Rule 62-555, Florida Administrative Code?

5 | A. Yes.

6 | Q. Does the utility have certified operators as required by Rule 61E12-41,

7 | Florida Administrative Code?

8 | A. Yes.

9 | Q. Has the utility established a cross-connection control program in

10 | accordance with Rule 62-555.360, Florida Administrative Code?

11 | A. Yes. It is a utility-wide program.

12 | Q. Is the overall maintenance of the treatment plant and distribution

13 | facilities satisfactory?

14 | A. Yes.

15 | Q. Does the water produced by the utility meet the State and Federal

16 | maximum contaminant levels for primary and secondary water quality standards?

17 | A. Yes.

18 | Q. Does the utility monitor the organic contaminants listed in Rule

19 | 62-550.410, Florida Administrative Code?

20 | A. Yes.

21 | Q. Do recent chemical analyses of raw and finished water, when compared to

22 | regulations, suggest the need for additional treatment?

23 | A. No.

24 | Q. Does the utility maintain the required chlorine residual or its

25 | equivalent throughout the distribution system?

1 A. Yes.

2 Q. Are the plant and distribution systems in compliance with all the other
3 provisions of Chapter 62, Florida Administrative Code, not previously
4 mentioned?

5 A. Yes.

6 Q. Has River Grove been the subject of any FDEP enforcement action within
7 the past two years?

8 A. No.

9 Silver Lake Oaks Water System

10 Q. Does the utility have a current construction permit from the FDEP for
11 Silver Lake Oaks Water System (Silver Lake Oaks)?

12 A. No.

13 Q. Are the utility's treatment facilities and distribution system
14 sufficient to serve its present customers?

15 A. Yes.

16 Q. Does the utility maintain the required 20 psi minimum pressure
17 throughout the distribution system?

18 A. Yes.

19 Q. Does the utility have an adequate auxiliary power source in the event
20 of a power outage?

21 A. No. It is not required due to Silver Lake Oaks' size.

22 Q. Are the utility's water wells for Silver Lake Oaks located in compliance
23 with Rule 62-555, Florida Administrative Code?

24 A. Yes.

25 Q. Does the utility have certified operators as required by Rule 61E12-41,

1 | Florida Administrative Code?
2 | A. Yes.
3 | Q. Has the utility established a cross-connection control program in
4 | accordance with Rule 62-555.360, Florida Administrative Code?
5 | A. Yes. It is a utility-wide program.
6 | Q. Is the overall maintenance of the treatment plant and distribution
7 | facilities satisfactory?
8 | A. Yes.
9 | Q. Does the water produced by the utility meet the State and Federal
10 | maximum contaminant levels for primary and secondary water quality standards?
11 | A. Yes.
12 | Q. Does the utility monitor the organic contaminants listed in Rule
13 | 62-550.410, Florida Administrative Code?
14 | A. No. The system has a waiver due to its size.
15 | Q. Do recent chemical analyses of raw and finished water, when compared to
16 | regulations, suggest the need for additional treatment?
17 | A. No.
18 | Q. Does the utility maintain the required chlorine residual or its
19 | equivalent throughout the distribution system?
20 | A. Yes.
21 | Q. Are the plant and distribution systems in compliance with all the other
22 | provisions of Chapter 62, Florida Administrative Code, not previously
23 | mentioned?
24 | A. Yes.
25 | Q. Has Silver Lake Oaks been the subject of any FDEP enforcement action

1 | within the past two years?

2 | A. No.

3 | St. John's Highlands Water System

4 | Q. Does the utility have a current construction permit from the FDEP for
5 | St. John's Highlands Water System (St. John's Highlands)?

6 | A. No.

7 | Q. Are the utility's treatment facilities and distribution system
8 | sufficient to serve its present customers?

9 | A. Yes.

10 | Q. Does the utility maintain the required 20 psi minimum pressure
11 | throughout the distribution system?

12 | A. Yes.

13 | Q. Does the utility have an adequate auxiliary power source in the event
14 | of a power outage?

15 | A. Yes. The St. John's Highlands system is interconnected to Hermit's Cove
16 | water treatment plant.

17 | Q. Are the utility's water wells for St. John's Highlands located in
18 | compliance with Rule 62-555, Florida Administrative Code?

19 | A. Yes.

20 | Q. Does the utility have certified operators as required by Rule 61E12-41,
21 | Florida Administrative Code?

22 | A. Yes.

23 | Q. Has the utility established a cross-connection control program in
24 | accordance with Rule 62-555.360, Florida Administrative Code?

25 | A. Yes. It is a utility-wide program.

1 Q. Is the overall maintenance of the treatment plant and distribution
2 facilities satisfactory?

3 A. Yes.

4 Q. Does the water produced by the utility meet the State and Federal
5 maximum contaminant levels for primary and secondary water quality standards?

6 A. No. Total Dissolved Solids are 900 mg, Chloride - 300 mg.

7 Q. Does the utility monitor the organic contaminants listed in Rule
8 62-550.410, Florida Administrative Code?

9 A. No. The system has a waiver due to its size.

10 Q. Do recent chemical analyses of raw and finished water, when compared to
11 regulations, suggest the need for additional treatment?

12 A. Yes. Treatment is necessary to remove chloride.

13 Q. Does the utility maintain the required chlorine residual or its
14 equivalent throughout the distribution system?

15 A. Yes.

16 Q. Are the plant and distribution systems in compliance with all the other
17 provisions of Chapter 62, Florida Administrative Code, not previously
18 mentioned?

19 A. Yes.

20 Q. Has St. John's Highlands been the subject of any FDEP enforcement action
21 within the past two years?

22 A. No.

23 Welaka/Saratoga Harbour Water System

24 Q. Does the utility have a current construction permit from the FDEP for
25 Welaka/Saratoga Harbour Water System. (Welaka/Saratoga Harbour)?

1 | A. Yes. A permit for hydropneumatic tank capacity increase/replacement at
2 | the Welaka mobile home park.

3 | Q. Are the utility's treatment facilities and distribution system
4 | sufficient to serve its present customers?

5 | A. Yes.

6 | Q. Does the utility maintain the required 20 psi minimum pressure
7 | throughout the distribution system?

8 | A. Yes.

9 | Q. Does the utility have an adequate auxiliary power source in the event
10 | of a power outage?

11 | A. No, it is not required due to the size of the individual systems. The
12 | interconnect is normally kept closed.

13 | Q. Are the utility's water wells for Welaka/Saratoga Harbour located in
14 | compliance with Rule 62-555, Florida Administrative Code?

15 | A. Yes.

16 | Q. Does the utility have certified operators as required by Rule 61E12-41,
17 | Florida Administrative Code?

18 | A. Yes.

19 | Q. Has the utility established a cross-connection control program in
20 | accordance with Rule 62-555.360, Florida Administrative Code?

21 | A. Yes. SSU has one program for all of its systems.

22 | Q. Is the overall maintenance of the treatment plant and distribution
23 | facilities satisfactory?

24 | A. Yes.

25 | Q. Does the water produced by the utility meet the State and Federal

1 | maximum contaminant levels for primary and secondary water quality standards?

2 | A. Yes.

3 | Q. Does the utility monitor the organic contaminants listed in Rule
4 | 62-550.410, Florida Administrative Code?

5 | A. No. This system has a waiver due to its size.

6 | Q. Do recent chemical analyses of raw and finished water, when compared to
7 | regulations, suggest the need for additional treatment?

8 | A. No.

9 | Q. Does the utility maintain the required chlorine residual or its
10 | equivalent throughout the distribution system?

11 | A. Yes.

12 | Q. Are the plant and distribution systems in compliance with all the other
13 | provisions of Chapter 62, Florida Administrative Code, not previously
14 | mentioned?

15 | A. Yes.

16 | Q. Has Welaka/Saratoga Harbour been the subject of any FDEP enforcement
17 | action within the past two years?

18 | A. No.

19 | **Wootens Water System**

20 | Q. Does the utility have a current construction permit from the FDEP for
21 | Wootens Water System (Wootens)?

22 | A. Yes, for an operator addition.

23 | Q. Are the utility's treatment facilities and distribution system
24 | sufficient to serve its present customers?

25 | A. Yes.

1 Q. Does the utility maintain the required 20 psi minimum pressure
2 throughout the distribution system?

3 A. Yes.

4 Q. Does the utility have an adequate auxiliary power source in the event
5 of a power outage?

6 A. No, it is not required due to Wootens' size.

7 Q. Are the utility's water wells for Wootens located in compliance with
8 Rule 62-555, Florida Administrative Code?

9 A. Yes.

10 Q. Does the utility have certified operators as required by Rule 61E12-41,
11 Florida Administrative Code?

12 A. Yes.

13 Q. Has the utility established a cross-connection control program in
14 accordance with Rule 62-555.360, Florida Administrative Code?

15 A. Yes. It is a utility-wide program.

16 Q. Is the overall maintenance of the treatment plant and distribution
17 facilities satisfactory?

18 A. Yes.

19 Q. Does the water produced by the utility meet the State and Federal
20 maximum contaminant levels for primary and secondary water quality standards?

21 A. No. TDS 630 mg, and odor no. 8 should be corrected with aerator
22 addition.

23 Q. Does the utility monitor the organic contaminants listed in Rule
24 62-550.410, Florida Administrative Code?

25 A. No. There is a waiver due to the system's size.

1 Q. Do recent chemical analyses of raw and finished water, when compared to
2 regulations, suggest the need for additional treatment?
3 A. Yes. An aerator to be installed.
4 Q. Does the utility maintain the required chlorine residual or its
5 equivalent throughout the distribution system?
6 A. Yes.
7 Q. Are the plant and distribution systems in compliance with all the other
8 provisions of Chapter 62, Florida Administrative Code, not previously
9 mentioned?
10 A. Yes.
11 Q. Has Wootens been the subject of any FDEP enforcement action within the
12 past two years?
13 A. No. There was a consent order regarding the aerator addition, but that
14 case is more than two years old.
15 Geneva Lake Estates Water System
16 Q. Does the utility have a current construction permit from the FDEP for
17 Geneva Lake Estates Water System (Geneva Lake Estates)?
18 A. No.
19 Q. Are the utility's treatment facilities and distribution system
20 sufficient to serve its present customers?
21 A. Yes.
22 Q. Does the utility maintain the required 20 psi minimum pressure
23 throughout the distribution system?
24 A. Yes.
25 Q. Does the utility have an adequate auxiliary power source in the event

1 | of a power outage?

2 | A. No. It is not required because the system serves less than 350 people.

3 | Q. Are the utility's water wells for Geneva Lake Estates located in

4 | compliance with Rule 62-555, Florida Administrative Code?

5 | A. Yes.

6 | Q. Does the utility have certified operators as required by Rule 61E12-41,

7 | Florida Administrative Code?

8 | A. Yes.

9 | Q. Has the utility established a cross-connection control program in

10 | accordance with Rule 62-555.360, Florida Administrative Code?

11 | A. Yes. SSU has a standard plan on file.

12 | Q. Is the overall maintenance of the treatment plant and distribution

13 | facilities satisfactory?

14 | A. Yes.

15 | Q. Does the water produced by the utility meet the State and Federal

16 | maximum contaminant levels for primary and secondary water quality standards?

17 | A. Yes.

18 | Q. Does the utility monitor the organic contaminants listed in Rule

19 | 62-550.410, Florida Administrative Code?

20 | A. Yes.

21 | Q. Do recent chemical analyses of raw and finished water, when compared to

22 | regulations, suggest the need for additional treatment?

23 | A. No.

24 | Q. Does the utility maintain the required chlorine residual or its

25 | equivalent throughout the distribution system?

1 A. Yes.

2 Q. Are the plant and distribution systems in compliance with all the other
3 provisions of Chapter 62, Florida Administrative Code, not previously
4 mentioned?

5 A. Yes.

6 Q. Has Geneva Lake Estates been the subject of any FDEP enforcement action
7 within the past two years?

8 A. No.

9 Keystone Club Estates Water System

10 Q. Does the utility have a current construction permit from the FDEP for
11 Keystone Club Estates Water System (Keystone Club Estates)?

12 A. No.

13 Q. Are the utility's treatment facilities and distribution system
14 sufficient to serve its present customers?

15 A. Yes.

16 Q. Does the utility maintain the required 20 psi minimum pressure
17 throughout the distribution system?

18 A. Yes.

19 Q. Does the utility have an adequate auxiliary power source in the event
20 of a power outage?

21 A. No. It is not required because the system serves less than 350 people.

22 Q. Are the utility's water wells for Keystone Club Estates located in
23 compliance with Rule 62-555, Florida Administrative Code?

24 A. Yes.

25 Q. Does the utility have certified operators as required by Rule 61E12-41,

1 Florida Administrative Code?
2 A. Yes.
3 Q. Has the utility established a cross-connection control program in
4 accordance with Rule 62-555.360, Florida Administrative Code?
5 A. Yes. SSU has a standard plan on file.
6 Q. Is the overall maintenance of the treatment plant and distribution
7 facilities satisfactory?
8 A. Yes.
9 Q. Does the water produced by the utility meet the State and Federal
10 maximum contaminant levels for primary and secondary water quality standards?
11 A. Yes.
12 Q. Does the utility monitor the organic contaminants listed in Rule
13 62-550.410, Florida Administrative Code?
14 A. Yes.
15 Q. Do recent chemical analyses of raw and finished water, when compared to
16 regulations, suggest the need for additional treatment?
17 A. No.
18 Q. Does the utility maintain the required chlorine residual or its
19 equivalent throughout the distribution system?
20 A. Yes.
21 Q. Are the plant and distribution systems in compliance with all the other
22 provisions of Chapter 62, Florida Administrative Code, not previously
23 mentioned?
24 A. Yes.
25 Q. Has Keystone Club Estates been the subject of any FDEP enforcement

1 | action within the past two years?

2 | A. None.

3 | Q. Do you have anything further to add?

4 | A. No, I do not.

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DOCKET 950495-WS
EXHIBIT NO. 203
CASE NO. 96-04227



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND
REHABILITATIVE SERVICES
District Four

LAWTON CHILES, GOVERNOR

HRS Duval County Public Health Unit
Environmental Health/Engineering Division
900 Building - Suite 300
900 University Boulevard North
Jacksonville, Florida 32211



ED AUSTIN, MAYOR

September 27, 1995

Ms. Catherine A. Walker, P.E.
Senior Permitting Engineer
Southern States Utilities, Inc.
1000 Color Place
Apopka, FL 32703

Re: Cobblestone Water Treatment
Plant Modifications

Dear Ms. Walker:

This is in reference to the Cobblestone Water Treatment Plant and the construction permit (No. 1695-WD-3210) which was issued on March 22, 1995 for Chlorination System Improvements. I am writing this because of on-going high chlorine complaints being received by this office. On September 7 a discussion with the system operator indicated that the chlorination system improvements are sorely needed to help alleviate maintenance problems associated with the fluctuations in the system chlorine residuals.

We encourage your company to move expediently on the execution of the aforementioned permit in order to effect an even application of chlorination to the system. Also, it appears that the limiting factor for the plant (the ground storage tank size) is exacerbating the high chlorine complaint problem by the fact that the ground storage tank detention time is not adequate during times of high demand. Accordingly, we seriously recommend that immediate consideration be given to an assessment of the limiting factors for the Cobblestone Water Treatment Plant and appropriate additional upgrades be initiated as indicated by the results of the assessment.

In regard to the June 30, 1995 Corrosion Control General Permit for the Cobblestone Water Treatment Plant (1695-WD-3312), we recommend that initiation of the pH adjustment treatment be commenced in accordance with the permit as soon as possible to minimize any effect of the intermittent high chlorine residuals on the corrosivity of the water.

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 950495-WS EXHIBIT NO. 203
COMPANY/ WITNESS: J.P. Rodriguez
DATE: 9/29/95

DOCUMENT NUMBER-DATE
02354 FEB 26 1996
FPSC-RECORDS/REPORTING

September 27, 1995

Ms. Catherine A. Walker, P.E.

I bring these matters to your attention because, in my opinion, it will be in the best interest of all parties involved to move toward stabilization of the operation of the Cobblestone Water Treatment Plant while simultaneously coordinating the installation of the necessary modifications for a smooth transition.

Thank you for your coordination in these and other matters. If you have any questions concerning this letter or wish to discuss the Cobblestone Water Treatment Plant situation please do not hesitate to contact me at (904) 630-3272.

Sincerely,


Thomas R. Hamilton, P.E. Supervisor II
Environmental Engineering Section

TRH/trh

Cc: Rafael A. Terrero, P.E.

THIS FILE



Southern States Utilities • 1000 Color Place • Apopka, FL 32703

RECEIVED

OCT 20 1995

ENVIRONMENTAL
ENGINEERING
DIVISION

October 11, 1995

Mr. Thomas R. Hamilton, P.E.
Supervisor II
HRS Duval County Public Health Unit
Environmental Health/Engineering Division
900 Building, Suite 300
900 University Boulevard North
Jacksonville, Florida 32211

Re: Cobblestone Water Treatment Plant Modifications

Dear Mr. Hamilton:

Thank you for your recent correspondence regarding the recommended improvements at the Cobblestone Water Treatment Facility. The following information is provided in response to your letters dated September 27, 1995, and October 3, 1995.

The chlorination system improvements authorized under construction permit no. 1695-WD-3210 are currently under construction and are expected to be in service prior to January 1, 1996. These improvements will help to alleviate problems associated with maintenance of a consistent chlorine dosage and acceptable system chlorine residuals.

In regard to the June 30, 1995 Corrosion Control General Permit (1695-WD-3312), equipment has been ordered, and we expect to have the pH adjustment improvements implemented by the end of November, 1995. With respect to your October 3, 1995 letter regarding permit no. 1693-WD-2842 for installation of Aqua-Mag at the Beacon Hills/Cobblestone Water Treatment facilities, review of the permit conditions and further evaluation of the system indicated that pH adjustment was a more desirable treatment than Aqua-Mag for this system. Consequently, plans were developed for installation of pH adjustment (caustic soda) for treatment to meet corrosion control requirements. Therefore, permit no. 1693-WD-2842 will not be implemented.

To respond to your comments regarding the ground storage tank size at Cobblestone, we have retained a consulting firm to perform preliminary engineering analysis of the Cobblestone facility to define limiting treatment factors and recommend improvements. The preliminary engineering report is nearing completion, and final cost estimates are being prepared for consideration for our 1996 capital budget.

We appreciate your concern and look forward to meeting with you on Friday, October 20 at 10:30 A.M. to further discuss these issues.

Sincerely:
Southern States Utilities, Inc.

Catherine A. Walker, P.E.
Senior Permitting Engineer





STATE OF FLORIDA
DEPARTMENT OF HEALTH AND
REHABILITATIVE SERVICES
District Four

LAWTON CHILES, GOVERNOR

HRS Duval County Public Health Unit

Environmental Health/Engineering Division
900 Building - Suite 300
900 University Boulevard North
Jacksonville, Florida 32211

April 26, 1995



ED AUSTIN, MAYOR

NOTICE OF VIOLATION

CERTIFIED - RETURN RECEIPT # P - 411 - 736 - 821

Rafael A. Terrero, P.E., Manager
Environmental Services
Southern States Utilities, Inc.
1000 Color Place
Apopka, Florida 32703

RE: Non-Compliance Letter
Beacon Hills
PWS ID# 2160064

Dear Mr. Terrero:

It has come to our attention that the Community Public Drinking Water System referenced above is out of compliance with Florida Administrative Code 62-551.800 Part VIII Public Education Requirements concerning the Lead and Copper Rule. The Rule specifically states that a system shall, within 60 days of exceeding the lead action level perform public education as specified in 62-551.810 (1) (2) (a) (b) (c) and (d). Our records indicate that this public water supply is out of compliance with this portion of the rule concerning samples that were taken in October 1994 and received by our office on January 23, 1995.

Failure to submit to our office within ten (10) working days of receipt of this letter for review and consideration for approval all required public education materials required by this rule will place the supplier of water subject to appropriate enforcement in accordance with fines and penalties commiserate with the degree of harm to the public.

If you have any questions or need assistance please call our office at (904) 630-3272.

Sincerely

A handwritten signature in cursive script, appearing to read 'Chris C. Carter'.

Chris C. Carter
Environmental Specialist III
Environmental Engineering Section

cc: Thomas R. Hamilton, P.E.
William R. Nowlin

COBBLESTONE LEAD/COPPER PROGRAM

**PWS SYSTEM: COBBLESTONE WTP
PWS ID#: 2164406
SAMPLING PLAN SUBMITTED: 02/4/93**

FIRST ROUND LEAD COPPER SAMPLES TAKEN:

1. 30 SAMPLES TAKEN: 08/92
2. 10 SAMPLES TAKEN: 12/92
- 40 SAMPLES REQUIRED BASED ON POPULATION

SAMPLE RESULTS: FIRST ROUND

**90TH PERCENTILE:
LEAD: 0.004 (mg/l)
COPPER: 2.2 (mg/l)*
*EXCEEDED ACTION LEVEL**

1. WQP SAMPLES TAKEN: 10/14/92
2. WQP SAMPLES TAKEN: 12/18/92
3. COPPER SOURCE WATER SAMPLE TAKEN: NONE

SECOND ROUND: LEAD/COPPER SAMPLES TAKEN:

1. 30 SAMPLES TAKEN: 06/93
2. 10 SAMPLES TAKEN: 07/93

**LEAD SAMPLE RESULTS:
90TH PERCENTILE: 0.009 (mg/l)**

**COPPER SAMPLE RESULTS:
90TH PERCENTILE: 2.6 (mg/l)**

**COPPER SOURCE WATER SAMPLE TAKEN: 11/93
SAMPLE RESULT: BDL**

BEACON HILLS LEAD/COPPER PROGRAM

**PWS SYSTEM: BEACON HILLS WTP
PWS ID#: 2160064
SAMPLING PLAN SUBMITTED: 02/4/93**

FIRST ROUND LEAD COPPER SAMPLES TAKEN:

1. 35 SAMPLES TAKEN: 08/92
5 SAMPLES TAKEN: 12/92
40 SAMPLES REQUIRED BASED ON POPULATION

SAMPLE RESULTS: FIRST ROUND

**90TH PERCENTILE:
LEAD: 0.014 (mg/l)
COPPER: 0.002 (mg/l)**

1. WQP SAMPLES TAKEN: 10/92
2. WQP SAMPLES TAKEN: 12/92

SECOND ROUND: LEAD/COPPER SAMPLES TAKEN:

1. 27 SAMPLES TAKEN: 06/93
2. 13 SAMPLES TAKEN: 07/93

**LEAD SAMPLE RESULTS:
90TH PERCENTILE: 0.014 (mg/l)**

**COPPER SAMPLE RESULTS:
90TH PERCENTILE: 0.7 (mg/l)**

**SSU REQUESTS REDUCED MONITORING:
11/22/93 (REVISED SAMPLING PLAN SUBMITTED)
APPROVED 11/22/93**

BEACON HILLS LEAD/COPPER REDUCED MONITORING

1. 9 SAMPLES TAKEN: 09/94
2. 11 SAMPLES TAKEN: 10/94

**LEAD SAMPLE RESULTS:
90TH PERCENTILE: 0.019 (mg/l)***

**COPPER SAMPLE RESULTS:
90TH PERCENTILE: 0.21 (mg/l)**

***LEAD EXCEEDED ACTION LEVEL**