

DOCKET NO.: 950495-WS - [Southern States Utilities, Inc. - Apache Shores Water System, Citrus Springs Water System, Crystal River Highlands Water System, Golden Terrace Water System, Spring Gardens Water System, Sugar Mill Woods Water System, Pine Ridge Utilities Water System, Lakeside Water System]

WITNESS: Direct Testimony of Sandra Sequeira, Florida Department of Environmental Protection, Appearing on Behalf of the Staff of the Florida Public Service Commission

DATE FILED: February 26, 1996

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DIRECT TESTIMONY OF SANDRA SEQUEIRA

- 2 Q. Please state your name and business address.
- 3 A. Sandra Sequeira, 3804 Coconut Palm Drive, Tampa, Florida 33619.
- 4 Q. Please state a brief description of your educational background and 5 experience.
- 6 A. I received a Bachelor of Science, from the University of Tampa in April,
- 7 1995. I have nine years of Environmental regulation. The later five years
- 8 have been in public water systems.
- 9 Q. By whom are you presently employed?
- 10 A. I am employed by the Florida Department of Environmental Protection
- 11 (FDEP).

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- 12 Q. How long have you been employed with the FDEP and in what capacity?
- 13 A. Since March 24, 1989. Presently my title is Environmental Specialist
- 14 II.
- 15 Q. What are your general responsibilities at the FDEP?
- 16 A. I inspect drinking water systems for compliance with Department
- 17 regulations, evaluate bacteriological and chemical analysis, and represent the
- 18 Department at public meetings and related enforcement activities.
- 19 Q. Are you familiar with the Southern States Utilities, Inc. water systems
- 20 | located in the Southwest District?
- 21 A. Yes.
- 22 Q. Were these systems inspected by you, or by FDEP staff under your
- 23 | supervision?
- 24 A. Yes.

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Apache Shores Water System

- 1 Q. Does the utility have a current construction permit from the FDEP for
- 2 | Apache Shores Water System (Apache Shores)?
- 3 A. No. The last permit was WC-09-1388, issued February 2, 1983.
- 4 | Q. Are the utility's treatment facilities and distribution system
- 5 | sufficient to serve its present customers?
- 6 A. The Department cannot answer this question with reasonable assurance in
- 7 regards to current plant capacity and treatment facility adequacy, since there
- 8 has not been a construction permit application submitted within the last five
- 9 years.
- 10 Q. Does the utility maintain the required 20 psi minimum pressure
- 11 | throughout the distribution system?
- 12 A. Yes. The Department verified that on the March 13, 1995, sanitary
- 13 survey.
- 14 | Q. Does the utility have an adequate auxiliary power source in the event
- 15 of a power outage?
- 16 A. No. There is no automatic start up equipment available.
- 17 Q. Are the utility's water wells for Apache Shores located in compliance
- 18 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. SSU has a standard plan, dated August 1992 on file with the Department.

- 1 | FDEP encourages a specific plan for each system.
- 2 Q. Is the overall maintenance of the treatment plant and distribution
- 3 | facilities satisfactory?
- 4 A. The Department has not done a field inspection to verify
- 5 physical/maintenance corrections found in the March 13, 1995, survey.
- 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. The system will not be required to analyze pesticide and PCB's
- 12 | until 1997.
- 13 Q. Do recent chemical analyses of raw and finished water, when compared to
- 14 regulations, suggest the need for additional treatment?
- 15 A. No.
- 16 Q. Does the utility maintain the required chlorine residual or its
- 17 | equivalent throughout the distribution system?
- 18 A. Yes. The utility's monthly operating reports documents show adequate
- 19 | chlorine residual.
- 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 Apache Shores been the subject of any FDEP enforcement action within
- 25 the past two years?

- 1 | A. No.
- 2 0. Do you have anything further to add regarding Apache Shores?
- 3 A. Yes. This system is required to have a second well pursuant to Rule 62-
- 4 | 555.320(6), Florida Administrative Code. However, the standby well available
- 5 at this facility does not have up-to-date chemical analysis, no iron filter
- 6 | nor automatic start-up equipment. In the event of an emergency or the main
- 7 | well being taken out of service the Department must give written approval
- 8 prior to the "stand-by" well being placed into service. The chlorine residual
- 9 | must be verified and main clearance of storage tank completed.

10 Citrus Springs Water System

- 11 Q. Does the utility have a current construction permit from the FDEP for
- 12 | Citrus Springs Water System (Citrus Springs)?
- 13 A. No.
- 14 Q. Are the utility's treatment facilities and distribution system
- 15 | sufficient to serve its present customers?
- 16 A. Yes.
- 17 Q. Does the utility maintain the required 20 psi minimum pressure
- 18 | throughout the distribution system?
- 19 A. Yes.
- 20 0. Does the utility have an adequate auxiliary power source in the event
- 21 of a power outage?
- 22 A. Yes.
- 23 Q. Are the utility's water wells for Citrus Springs located in compliance
- 24 | with Rule 62-555, Florida Administrative Code?
- 25 A. Yes.

- 1 | Q. Does the utility have certified operators as required by Rule 61E12-41,
- 2 | Florida Administrative Code?
- 3 | A. Yes.
- 4 Q. Has the utility established a cross-connection control program in
- 5 accordance with Rule 62-555.360, Florida Administrative Code?
- 6 A. Yes.
- 7 | Q. Is the overall maintenance of the treatment plant and distribution
- 8 | facilities satisfactory?
- 9 A. Yes.
- 10 | Q. Does the water produced by the utility meet the State and Federal
- 11 | maximum contaminant levels for primary and secondary water quality standards?
- 12 | A. Yes.
- 13 Q. Does the utility monitor the organic contaminants listed in Rule
- 14 | 62-550.410, Florida Administrative Code?
- 15 | A. Yes.
- 16 Q. Do recent chemical analyses of raw and finished water, when compared to
- 17 regulations, suggest the need for additional treatment?
- 18 A. No.
- 19 Q. Does the utility maintain the required chlorine residual or its
- 20 equivalent throughout the distribution system?
- 21 A. Yes.
- 22 | Q. Are the plant and distribution systems in compliance with all the other
- 23 provisions of Chapter 62, Florida Administrative Code, not previously
- 24 | mentioned?
- 25 A. Yes.

- 1 Q. Has Citrus Springs been the subject of any FDEP enforcement action 2 within the past two years?
- 3 A. No.

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Crystal River Highlands Water System

- 5 Q. Does the utility have a current construction permit from the FDEP for
- 6 | Crystal River Highlands Water System (Crystal River Highlands)?
- 7 A. No.
- 8 Q. Are the utility's treatment facilities and distribution system
 9 sufficient to serve its present customers?
- 10 A. The Department cannot answer this question with reasonable assurance in
- 11 regards to current plant capacity and treatment facility adequacy, since there
- 12 has not been a construction permit within the last five years.
- 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. No, it does not. However, presently that is not a requirement for
- 19 | system of this size.
- 20 Q. Are the utility's water wells for Crystal River Highlands located in
- 21 compliance with Rule 62-555, Florida Administrative Code?
- 22 A. Yes.
- 23 Q. Does the utility have certified operators as required by Rule 61E12-41,
- 24 | Florida Administrative Code?
- 25 A. Yes.

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

Golden Terrace Water System

- Q. Does the utility have a current construction permit from the FDEP for Golden Terrace Water System (Golden Terrace)?
- 1 A. No.

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- Q. Are the utility's treatment facilities and distribution system
 6 sufficient to serve its present customers?
- 7 A. Yes. It should be noted that this is a consecutive water system with 8 no plant of its own. Water is provided by the City of Inverness.
- 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. The City of Inverness has auxiliary power.
- 15 Q. Are the utility's water wells for Golden Terrace located in compliance
- 16 | with Rule 62-555, Florida Administrative Code?
- 17 A. This rule is not applicable.
- 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.
- 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?

- $1 \mid A$. Yes. However, the utility has exceeded lead/copper action levels in
- 2 | more than 10% of the samples.
- 3 | Q. Does the utility monitor the organic contaminants listed in Rule
- 4 62-550.410, Florida Administrative Code?
- 5 A. Yes. The City of Inverness is up-to-date with chemical monitoring.
- Q. Do recent chemical analyses of raw and finished water, when compared to regulations, suggest the need for additional treatment?
- 8 A. Yes. Lead and copper corrosion control is being implemented by the 9 supplier.
- 10 Q. Does the utility maintain the required chlorine residual or its
 11 equivalent throughout the distribution system?
- 12 A. Yes.
- 13 Q. Are the plant and distribution systems in compliance with all the other
- 14 provisions of Chapter 62, Florida Administrative Code, not previously
- 15 | mentioned?
- 16 A. Yes.
- 17 Q. Has Golden Terrace been the subject of any FDEP enforcement action
- 18 | within the past two years?
- 19 A. No.

20 | Spring Gardens Water System

- 21 Q. Does the utility have a current construction permit from the FDEP for
- 22 | Spring Gardens Water System (Spring Gardens)?
- 23 A. Yes, permit WC 09-231175, issued November 22, 1994.
- 24 Q. Are the utility's treatment facilities and distribution system
- 25 sufficient to serve its present customers?

- 1 | A. Yes.
- 2 Q. Does the utility maintain the required 20 psi minimum pressure
- 3 | throughout the distribution system?
- 4 A. Yes.
- 5 | Q. Does the utility have an adequate auxiliary power source in the event
- 6 of a power outage?
- 7 A. No. As connections and populations have approached the requirement
- 8 | criteria, that requirement is now applicable.
- 9 Q. Are the utility's water wells for Spring Gardens located in compliance
- 10 | with 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.
- 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. No. The utility has a waiver on file for unregulated Group I, II, III.
- $2 \mid Q$. Do recent chemical analyses of raw and finished water, when compared to
- 3 regulations, suggest the need for additional treatment?
- 4 A. No.
- Q. Does the utility maintain the required chlorine residual or its equivalent throughout the distribution system?
- 7 A. Yes. The September, 1995 monthly operating reports residuals are 8 documented to meet Florida Administrative Code requirements.
- Q. Are the plant and distribution systems in compliance with all the other provisions of Chapter 62, Florida Administrative Code, not previously
- 11 mentioned?
- 12 A. No. The Department is awaiting "after the fact" permit review for the replacement of pump which was installed in August, 1993.
- Q. Has Spring Gardens been the subject of any FDEP enforcement action within the past two years?
- 16 A. No.

17 Sugar Mill Woods Water System

- 18 Q. Does the utility have a current construction permit from the FDEP for
- 19 | Sugar Mill Woods Water System (Sugar Mill Woods)?
- 20 A. No.
- 21 Q. Are the utility's treatment facilities and distribution system
- 22 | sufficient to serve its present customers?
- 23 | A. Yes.
- 24 Q. Does the utility maintain the required 20 psi minimum pressure
- 25 throughout the distribution system?

- 1 | A. Yes. The system records pressure on a daily plant log.
- 2 | Q. Does the utility have an adequate auxiliary power source in the event
- 3 of a power outage?
- 4 A. Yes.
- 5 | Q. Are the utility's water wells for Sugar Mill Woods located in compliance
- 6 | with Rule 62-555, Florida Administrative Code?
- 7 A. Yes.
- 8 Q. Does the utility have certified operators as required by Rule 61E12-41,
- 9 Florida Administrative Code?
- 10 A. Yes.
- 11 Q. Has the utility established a cross-connection control program in
- 12 | accordance with Rule 62-555.360, Florida Administrative Code?
- 13 | A. Yes.
- 14 Q. Is the overall maintenance of the treatment plant and distribution
- 15 | facilities satisfactory?
- 16 A. Yes.
- 17 | Q. Does the water produced by the utility meet the State and Federal
- 18 | maximum contaminant levels for primary and secondary water quality standards?
- 19 A. Yes.
- 20 | Q. Does the utility monitor the organic contaminants listed in Rule
- 21 | 62-550.410, Florida Administrative Code?
- 22 A. Yes.
- 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 \mid 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.
- Q. Has Sugar Mill Woods been the subject of any FDEP enforcement action
 9 within the past two years?
- 10 Pine Ridge Utilities Water System
- 11 Q. Does the utility have a current construction permit from the FDEP for
- 12 | Pine Ridge Water System (Pine Ridge Utilities)?
- 13 A. No.
- 14 0. Are the utility's treatment facilities and distribution system
- 15 | sufficient to serve its present customers?
- 16 A. Yes.
- 17 Q. Does the utility maintain the required 20 psi minimum pressure
- 18 | throughout the distribution system?
- 19 A. Yes.
- 20 | Q. Does the utility have an adequate auxiliary power source in the event
- 21 of a power outage?
- 22 A. Yes. (Note: only Well #4 has adequate auxiliary power. Well #2 and
- 23 | #3 do not comply).
- 24 Q. Are the utility's water wells for Pine Ridge Utilities located in
- 25 compliance with Rule 62-555, Florida Administrative Code?

- 1 | A. Yes.
- 2 0. 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.
- 8 0. Is the overall maintenance of the treatment plant and distribution
- 9 | facilities satisfactory?
- 10 A. Yes.
- 11 Q. Does the water produced by the utility meet the State and Federal
- 12 | maximum contaminant levels for primary and secondary water quality standards?
- 13 A. Yes.
- 14 Q. Does the utility monitor the organic contaminants listed in Rule
- 15 | 62-550.410, Florida Administrative Code?
- 16 A. Yes.
- 17 Q. Do recent chemical analyses of raw and finished water, when compared to
- 18 regulations, suggest the need for additional treatment?
- 19 A. No.
- 20 Q. Does the utility maintain the required chlorine residual or its
- 21 equivalent throughout the distribution system?
- 22 A. Yes, verified during Department inspections.
- 23 | Q. Are the plant and distribution systems in compliance with all the other
- 24 provisions of Chapter 62, Florida Administrative Code, not previously
- 25 | mentioned?

- 1 | A. Yes.
- 2 Q. Has Pine Ridge Utilities been the subject of any FDEP enforcement action
- 3 | within the past two years?
- 4 A. No.
- 5 Lakeside Water System
- 6 | Q. Does the utility have a current construction permit from the FDEP for
- 7 | Lakeside Water System (Lakeside)?
- 8 A. No.
- 9 Q. Are the utility's treatment facilities and distribution system
- 10 | sufficient to serve its present customers?
- 11 A. Yes. (Note: system population slowly approaching second well
- 12 requirement. Presently only one well is monitored).
- 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. (Note: no second well is being monitored).
- 19 Q. Are the utility's water wells for Lakeside located in compliance with
- 20 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 Lakeside been the subject of any FDEP enforcement action within the
- 23 | past two years?
- 24 A. No.
- 25 | Q. Do you have anything further to add?

- 17 -