

LAW OFFICES
ROSE, SUNDSTROM & BENTLEY, LLP
2548 BLAIRSTONE PINES DRIVE
TALLAHASSEE, FLORIDA 32301

(850) 877-6555
Fax (850) 656-4029
www.rsbatorneys.com

ORIGINAL

CENTRAL FLORIDA OFFICE
650 S. NORTH LAKE BLVD., SUITE 420
ALTAMONTE SPRINGS, FLORIDA 32701
(407) 830-6331
FAX (407) 830-8522

CHRIS H. BENTLEY, P.A.
ROBERT C. BRANNAN
F. MARSHALL DETERDING
MARTIN S. FRIEDMAN, P.A.
JOHN R. JENKINS, P.A.
STEVEN T. MINDLIN, P.A.
DAREN L. SHIPPY
WILLIAM E. SUNDSTROM, P.A.
DIANE D. TREMOR, P.A.
JOHN L. WHARTON
ROBERT M. C. ROSE, OF COUNSEL
WAYNE L. SCHIEFELBEIN, OF COUNSEL

December 4, 2002

REPLY TO ALTAMONTE SPRINGS

RECEIVED: FPSC
DEC - 4 PM 12:27
COMMISSION
CLERK

Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

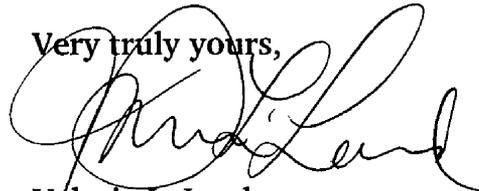
Re: **Docket No. 020408-SU; Application of Alafaya Utilities, Inc., for Rate Increase in Seminole County, Florida**
Our File No.: 30057.46

Dear Ms. Bayo:

Enclosed please find the original and five (5) copies of Alafaya Utilities, Inc.'s Response to the Commission's First Data Request dated October 31, 2002.

Should you have questions concerning this filing, please do not hesitate to contact me.

Very truly yours,



Valerie L. Lord
For the Firm

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC 1
OTH _____

VLL:dmp

Utilities\Alafaya Rate Case\Bayo (PSC) 04.ltr

DOCUMENT NUMBER-DATE

13239 DEC-4 02

FPSC-COMMISSION CLERK

ALAFAYA UTILITIES, INC.

AN AFFILIATE OF UTILITIES, INC.
200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961
florida@utilitiesinc-usa.com

December 2, 2002

Ms. Blanca Bayo, Director
Division of the Commission Clerk and Administrative Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 020408-SU
Application for Rate Increase in Seminole County by Alafaya Utilities, Inc.
STAFF'S FIRST DATA REQUEST

Dear Ms. Bayo:

Our office is in receipt of the Commission's First Data Request dated October 31, 2002. Each of the items addressed in the Commission's letter are referenced below with our response immediately following.

- 1 Please provide a detailed reconciliation of the \$26,248 amount and the \$28,302 amount.

This information is being provided under separate cover and should be sent shortly.

- 2 With regard to the DEP Inspection reports and notices that were provided in the utility's Exhibit 4, please provide a copy of the utility's response to these reports and notices that were not included in its filing.

Please refer to the enclosed items.

- 3 On August 8, 2002, Daniel K. Smith of DEP sent the utility a letter regarding Alafaya's wastewater permit application.

- a Please provide the utility response to this letter.

Please see the attached response to the August 8, 2002 letter.

- b If the utility has not responded yet, state when it intends to respond to this letter, and please provide a copy of the letter when the utility responds.

Please refer to utility response for 3.a.

- 4 On October 7, 2002, Christianne C. Ferraro of DEP sent the utility a noncompliance letter regarding Alafaya's wastewater treatment facility.

a Please provide the utility response to this letter.

Please see the attached response to the October 7, 2002 letter.

b If the utility has not responded yet, state when it intends to respond to this letter, and please provide a copy of the letter when the utility responds.

Please refer to utility response for 3.a.

- 5 During the October 17, 2002 meeting, the utility was considering a wet weather discharge to the Little Econlockhatchee River. The DEP discussed that a wet weather discharge would be extremely difficult to obtain. What other means of effluent disposal is the utility considering?

The utility is currently evaluating several effluent disposal alternatives and evaluating the expected reclaimed water system demand curves to quantify the additional effluent disposal required. These alternatives will be addressed as the utility progresses through its wastewater permit renewal process. The utility will forward a copy of any future correspondence with DEP to the PSC during the permit renewal process.

- 6 It is staff's understanding that reuse will be available to an additional 500 homes by the end of the year. Of these 500 homes, how many of these homes does the utility estimate will accept reuse service within the first year that the service is available?

The utility estimates that approximately 10% of the available homes will request service within the first year. The utility estimate is based on the assumption that since there will be minor retrofitting to the residential irrigation systems and the homes sites are newer that the participation rate will be higher than the participation rate currently experienced by the utility in "older" subdivisions.

7

a Have reuse meters been installed for the existing and/or the 500 potential reuse customers?

Meters are not installed at each individual residential connection. Master meters are installed at designated connection points to each subdivision to monitor water usage within that subdivision.

b If so, what is the cost per meter?

The cost for each master meter installation has varied depending on the size of the meter and the specific installation. For example the 6" meter for the Waverlee Woods subdivision cost approximately \$3,650 to have installed.

- c If not, what is the estimated cost of installing a meter?

The estimated cost for installing a meter at each individual residence is estimated to be approximately \$50 not including any costs associated with connecting the customers irrigation system to the reclaimed system nor administrative charges.

8

- a For homes where reuse is available and not used, what is the source of irrigation?

For homes that do not connect to the reclaimed water system when available, in almost all cases, the source for irrigation water is the potable water system provided by the City of Oviedo.

- b Do these homes have existing irrigation systems?

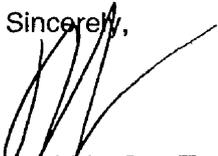
Most, if not all, of the homes within the projected reclaimed water service area of the utility have irrigation systems.

- 9 What additional cost per customer would be associated with connecting a new reuse customer in an area where reuse is available?

The costs borne by the customer vary depending on the quantity of work required to connect the customers irrigation system to the utility's reclaimed water system. The utility does not have any specific information on the cost to the customer to connect to the utility's reclaimed system.

If you have any questions or need additional information, please contact me.

Sincerely,



David L. Orr, E
Regional Manager

DLO/ks

cc: Martin S. Friedman, Esquire
Frank Seidman, Regulatory & Management Consultants
Deborah Swain, Milian, Swain & Associates, Inc.
Steve Lubertozzi, Director, Regulatory Accounting, UI
Don Rasmussen, Vice President, UIOF

ALAFAYA UTILITIES, INC.

Docket No. 020408-SU

Response to Staff's First Data Request

Dated: October 31, 2002

Item 2

Utility's Response to FDEP Inspection Reports and Notices

ALAFAYA UTILITIES, INC.

200 Weathersfield Avenue
Altamonte Springs, Florida 32714

Telephone: 407-869-1919
Fax: 407-869-6961

January 15, 1997

Ms. Ilija Herrera
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

COPY OF WHAT WAS SENT TO
DEP (CERTIFIED MAIL)
1/15/97

RE: Response to Routine Inspection
Alafaya Utilities WWTF

Dear Ms. Herrera:

This letter is in response to the Department's letter dated January 6, 1997, regarding the routine inspection of the Alafaya Wastewater Treatment Facility. The four unsatisfactory items noted in your letter are reprinted below in bold type, with our response immediately following.

- 1. A review of on-site sample chain of custody records and laboratory reports indicated a discrepancy. The sample chain of custody sheet for samples collected on October 23, 1996, indicated that the samples were collected at 10:00 am and relinquished to Tri-Tech Laboratory on October 23, 1996 at 2:00 p.m. The laboratory report for the same samples indicated a sample set up time for the fecal coliform sample of 12:10 p.m. on October 23, 1996.**

We have discussed this discrepancy with Tri-Tech Analytical Laboratories and they have assured us that this is an isolated incident. Enclosed is Tri-Tech Labs' response to this discrepancy and a copy of the corrected report.

- 2. The effluent automatic samplers collected 30 mL per aliquot, which was less than the required 100 mL per individual sample aliquot.**

I have discussed this item with our personnel and been assured that the automatic sampler has been reprogrammed to collect 300 mL samples every 60 minutes for a minimum of 16 hours.

- 3. The Total Suspended Solids (TSS) samples of the public access reuse effluent were not being collected after filtration and prior to chlorination as required by Specific Condition Number I.B.1 of Wastewater Permit Number FLA11074.**

I have discussed this item with our personnel and been informed that a sampling point has been established at sampling point number 25458 (turbidity sampling point) which is after filtration and prior to re-chlorination.

January 15, 1997

Ms. Iia Herrera
Florida Department of Environmental Protection

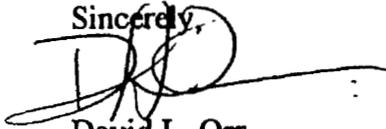
- 4. A review of the ground water files for this facility indicated the following deficiency:**

The Department has not received the ground water monitoring data for the first quarter of 1996. Please submit this data.

The groundwater monitoring reports for the first quarter of 1996 are enclosed.

If you have any questions or require additional information, please contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read 'DLO', with a long horizontal flourish extending to the right.

David L. Orr
Assistant Operations Manager

cc: Don Rasmussen, V.P., UIOF

ALAFAYA UTILITIES, INC.
AN AFFILIATE OF UTILITIES, INC.
200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

*cancel - Em 4/11
KG 4/23
JK 4/2
Please advise the
Compliment.
-Kaden*

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440



April 16, 1997

Ms. Ilija Hererra
Florida Department of
Environmental Protection
3319 Maguire Boulevard - Suite 232
Orlando, FL 32803-3767

RE: Response to Department's Letter
Dated April 8, 1997

Dear Ms. Hererra:

Upon investigation of the recurring problems at our Twin Rivers master lift station, two distinct problems need to be addressed. The first is the excessive down time incurred by electrical controls excessively corroded by Hydrogen Sulfide Gas entering the control panel. The second is the collection system design flaw in the Alafaya Woods subdivision; specifically the elevations of the collection system on Magee Court. This letter will explain the solutions to the above mentioned problems.

Throughout the service life of the Twin Rivers lift station adequate protection from the intrusion of hydrogen sulfide gas into the control panel was never used. In the process of removing and reinstalling pumps into the wetwell and other frequently occurring services to the station the seals used to inhibit the gases from entering the panel were inadequately replaced by contract personnel or all together not replaced. Over the years this has caused a severe deterioration to the electrical controls inside of the panel.

Due to the importance of this lift station in our Alafaya Utilities collection system, we have determined that the appropriate step is the complete replacement of the control panel serving this lift station. Also, in good measure, we have added to our standard control panel a digital duplex pump controller, a backup duplex pump controller, and a digital bubbler system with backup float control. In addition, the items determined to be the most common causes of downtime will have parameters monitored and reported to an automatic dialer system connected to backup power. The automatic dialer system will decrease our response time in the event of problem and inform our operating personnel of the nature of the problem previous to their arrival at the lift station. A junction box will be added to the panel to insure the integrity of the control panel in the future. The junction box will serve as a barrier to restrict the penetration of hydrogen sulfide gas into the new control panel.

Upon investigating the repeated overflows at 1010 North Magee Court a design flaw was discovered inherent to the collection system. The elevation of the terminal manhole and service laterals serving the residences on the cul-de-sac of North Magee Court are lower than the rest of the service main, including the top elevation of the lift station.

Our proposed solution to this problem consists of the installation of a "flapper valve" at the terminal end of the service main serving North Magee Court as it enters the manhole at the intersection of North Magee Court and Kelley Creek Circle. It is our contention that by installing the flapper valve, if a backup ever does occur in the collection system the valve will close. Thus, not allowing sewage access to the lowest

April 16, 1997

Ms. Ilia Herrera
Florida Department of
Environmental Protection

part of the collection system. The installation of the flapper valve will also allow the use of the remaining six (6) feet in elevation difference between the top of the North Magee Court terminal manhole and the next highest elevation.

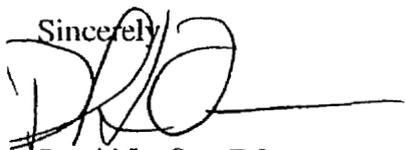
After the flapper valve is installed and adequately tested we will remove the overflow pipe as mentioned in the departments letter. Please understand, that although our operating personnel took upon themselves the action of installing the overflow pipe in the service lateral at 1010 North Magee Court, the installation was done in an effort to keep raw sewage from entering the residence.

We expect the installation of the flapper valve to occur the week of April 14, 1997. Upon successful completion of testing the overflow pipe will be removed. The control panel is on order and is expected to be installed approximately 4 to 5 weeks after the date of this letter.

In the interim, a basic automatic dialer system is expected to be installed the week of April 21, 1997. We will be able to monitor basic parameters and alert personnel immediately to any problem. Also in the interim, our personnel have increased significantly the frequency of visits to the lift station in an effort to deter any further problems. We have also replaced all controls which are known to be affected by corrosion.

We thank the Department for its understanding regarding this matter. If there are any questions regarding the proposed actions outlined in this letter please contact me.

Sincerely



David L. Orr, E.I.
Assistant Operations Manager

cc: Don Rasmussen, V.P., UIOF
Rick Newburg, Alafaya Utilities

Mr. Darryl Colbert
1010 North Magee Court
Oviedo, FL 32765

File

UTILITIES, INC. OF FLORIDA
AN AFFILIATE OF UTILITIES, INC.
200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

FILE

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961

July 3, 1997

Ms. Iliá Herrera
Department of Environmental Protection
3319 Maguire Boulevard
Suite 232
Orlando, FL 32803

RE: Alafaya Utilities, Inc. - FLA011074
Response to Department's
Inspection Report

Dear Ms. Herrera:

This letter is in response to the Department's letter dated June 19, 1997 regarding the routine inspection of our Alafaya Wastewater Treatment Facility. The unsatisfactory conditions noted in the Department's inspection report have been reproduced below in bold with our response immediately following.

1. **Entries in the calibration log were recorded in pencil.**

Personnel have been instructed to use ink when recording entries in the calibration log.

2. **There was no documentation indicating that the composite samples were maintained at or below 4 degrees Celsius.**

Personnel have been instructed to record the temperature at the composite sampler sites when in use.

3. **The continuous monitoring meters for total residual chlorine, pH and turbidity were not calibrated as required. In addition to daily field calibration checks, weekly calibration of these instruments against known standards should be conducted.**

We are currently in the process of obtaining the methodology for the calibration of the lab chlorine analyzer. The lab pH, turbidity and chlorine analyzers will be calibrated weekly per the manufacturers specifications against known standards.

4. **A review of the ground water files for this facility indicated the following deficiencies:**

- a) **The Department has not received the ground water monitoring data for the first quarter of 1996.**

Please refer to the enclosed copies of the Ground water monitoring analysis.

July 3, 1997

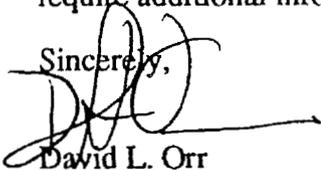
Ms. Ilija Herrera
Department of Environmental Protection
Page Two

- b) The data for the monitoring well on the Ekana Golf Course was not submitted with the rest of the data for the third quarter of 1996. Please submit this information.**

Please refer to the enclosed copies of the Ground water monitoring analysis.

We feel confident that the information contained herein satisfies your request for corrective action. If you require additional information please do not hesitate to contact our office.

Sincerely,



David L. Orr
Assistant Operations Manager

cc: Don Rasmussen, Vice President, UIOF
FDEP Correspondence File

ALAFAYA UTILITIES, INC.

AN AFFILIATE OF UTILITIES, INC.

200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

*File
10/10/98
AD
8/24*

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961

August 12, 1998



Mr. Michael E. Hall
Florida Department of Environmental Protection
3319 Maguire Boulevard - Suite 232
Orlando, FL 32803

RE: Alafaya Utilities, Inc.
Alafaya Wastewater Treatment Facility
Response to Department's Noncompliance Letter dated July 29, 1998

Dear Mr. Hall:

This letter is in response to the Department's letter dated July 29, 1998, regarding the routine compliance inspection of the Alafaya Wastewater Treatment Facility. The three (3) unsatisfactory items noted in your letter are reprinted below in bold type, with our response immediately following.

- 1. Correction Fluid was used on the July 1997 Discharge Monitoring Report (DMR). Corrections should be made by drawing a single line through the error and writing in the correction and the initials of the person making the correction.**

We have reinforced this policy with our operating personnel.

- 2. Total Suspended Solids (TSS) values for March and April 1997 were reported as 5.1 mg/L and 5.3 mg/L respectively. These values exceed the maximum limit of 5.0 mg/L for TSS.**

We will investigate the circumstances surrounding these samples and provide the Department with our results within twenty (20) days of the date of this letter.

- 3. A review of the ground water files for this facility indicates the following deficiencies:**
 - a) The Department has not received the ground water monitoring reports from the fourth quarter 1997. The Ekana Golf Course monitoring well MW-1 was missing from the second quarter 1998. Please provide the Department with the missing data.**

We have enclosed a copy of the referenced data for the Department's records.

- b) Please provide the Department with a detailed explanation of the field procedures used to collect samples from the ground water monitoring wells.**

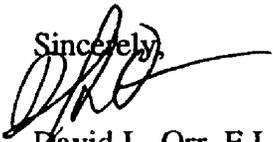
Our ground water monitoring wells are sampled by Tri-Tech Laboratories, Inc. It is our understanding their sampling protocol is already on file with the Department. If you require an additional copy for your records please let us know and we will have the lab forward a copy to your office.

August 12, 1998

Mr. Michael E. Hall
Florida Department of Environmental Protection
Page Two

If you require additional information please contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Orr', with a long horizontal flourish extending to the right.

David L. Orr, E.I.
Assistant Operations Manager

cc: Don Rasmussen, V.P., UIOF

ALAFAYA UTILITIES, INC.
AN AFFILIATE OF UTILITIES, INC.
200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

Handwritten notes:
6-9/8
KG
ALH 9/8

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961

September 1, 1998



Mr. Michael E. Hall
Florida Department of Environmental Protection
3319 Maguire Boulevard - Suite 232
Orlando, FL 32803

RE: Alafaya Wastewater Treatment Facility
Additional Response to Department's Noncompliance Letter dated July 29, 1998

Dear Mr. Hall:

This letter is a follow-up to my previous correspondence dated August 12, 1998 and is in response to the Department's letter dated July 29, 1998, regarding the routine compliance inspection of the Alafaya Wastewater Treatment Facility. Item number 2. in the Department's letter required investigation. The Department's comment is below in bold type with our response immediately following.

2. **Total Suspended Solids (TSS) values for March and April 1997 were reported as 5.1 mg/L and 5.3 mg/L respectively. These values exceed the maximum limit of 5.0 mg/L for TSS.**

We have investigated the circumstances surrounding these sampling results to the best of our ability.

- a) On March 11, 1997 the plant log book entries indicate that the plant was experiencing a high sludge blanket in the clarifier. Filters were taken off-line at approximately 1:00 PM.
- b) On April 2, 1997 the plant log book indicates that a problem was experienced with the in-line turbidity meter. However, the log book indicates the problem was identified at 3:00 PM, not at 10:45 AM when the sample was taken.

The plant does have an in-line turbidity meter and normal operating protocol requires diversion of any substandard effluent registering greater than 2.0 Ntu's to a substandard holding tank via automatic valves.

If you require additional information please contact our office.

Sincerely,

David L. Orr, E.I.
Assistant Operations Manager

cc: Don Rasmussen, V.P., UIOF

ALAFAYA UTILITIES, INC.

AN AFFILIATE OF UTILITIES, INC.

200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961

November 23, 1998

Mr. John B. Bowles
Florida Department of Environmental Protection
Central District
3319 Maguire Boulevard - Suite 232
Orlando, FL 32803-3767

RE: Department's Letter Dated November 10, 1998
Response to Noncompliance Letter

Dear Mr. Bowles:

I must apologize for my oversight with regards to written notice within five days of the time a permittee becomes aware of a noncompliance circumstance. All of the incidents reported via the facsimiles were reported to the department within the 24-hour time frame, however, not followed-up by facsimile within the five day time frame.

All incidents of noncompliance will be sent to the Department as outlined in the permit. Operational procedures require the operator on duty to notify the Department of a noncompliance issue and I will follow-up via facsimile within the five day time frame.

Again I must apologize for this oversight. If you require additional information please let me know.

Sincerely,

David L. Orr, E.I.
Assistant Operations Manager

cc: Don Rasmussen, V.P., UIOF
Bryan Gongre, Area Manager, UIOF
Charlie Forehand, Asst. Area Manager, UIOF
File

ALAFAYA UTILITIES, INC.

AN AFFILIATE OF UTILITIES, INC.

200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

FILE

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961
E-Mail: uif@iag.net

May 24, 1999

Ms. Marsha E. Johnson
Florida Department of Environmental Protection
3319 Maguire Boulevard - Suite 232
Orlando, FL 32803-3767

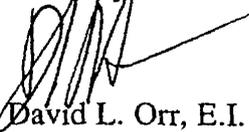
RE: FDEP Permit No.: FLA011074
Repair or Replacement of Monitoring Well # 5
Department Letter Dated May 4, 1999

Dear Ms. Johnson:

In accordance with our conversation, enclosed is the required documentation for the replacement of monitoring well #5. The documentation includes, Monitoring Well Completion Report, Well Completion Log, Explanation for replacement, and Sealed Survey including top of casing and ground elevation in NGVD.

If you require additional information, or if you have any questions please let me know.

Sincerely,



David L. Orr, E.I.
Regional Operations Manager

Enclosure

cc: Don Rasmussen, V.P., UIOF
Bryan Gongre, Area Manager, UIOF

DLO/ks

Florida Department of Environmental Protection

Suite 232 3319 Maguire Boulevard Orlando, Florida 32803

MONITORING WELL COMPLETION REPORT

DATE 4-26-99

FACILITY NAME: Alafaya Woods Development WWTP

PERMIT NO.: FLA011074 FACILITY GMS NO.: 3059P00434

WELL GMS NO.: _____ WELL NAME: MW-5 (new)

WELL TYPE: BACKGROUND _____ DETECTION _____ COMPLIANCE X

LATITUDE AND LONGITUDE: N 28° 39.255' / W 081° 11.846'

AQUIFER MONITORED: Surficial

DRILLING METHOD: Hollow-stem auger DATE INSTALLED: 4-26-99

INSTALLED BY: Groundwater Protection, Inc.

BORE HOLE DIAMETER: 8" TOTAL DEPTH: 15 Feet (BLS)

CASING TYPE: Sch. 40 PVC CASING DIAMETER: 2" CASING LENGTH: 5 feet + 3 feet stick up = 8

SCREEN TYPE: Sch. 40 PVC SCREEN SLOT SIZE: 0.006" SCREEN LENGTH: 10 feet

SCREEN DIAMETER: 2" SCREEN INTERVAL: 5 feet TO 15 feet (BLS)

FILTER PACK TYPE: Silica Sand FILTER PACK GRAIN SIZE: 30/65

INTERVAL COVERED: 3 feet TO 15 feet (BLS)

SEALANT TYPE: 30/65 Silica Sand SEALANT INTERVAL: 2 feet TO 3 feet (BLS)

GROUT TYPE: Type I neat cement GROUT INTERVAL: 0 TO 2 feet (BLS)

TOP OF CASING ELEVATION (NGVD): 84.22' GROUND SURFACE ELEVATION (NGVD): 81.46'

DESCRIBE WELL DEVELOPMENT: well was developed by pumping followed by surge block, followed by additional pumping

POST DEVELOPMENT WATER LEVEL ELEVATION (NGVD): 79.58'

DATE AND TIME MEASURED: 5-12-99 / 12:45 Pm

REMARKS: this well replaces original MW-5, which was damaged. Original MW-5 was abandoned by grouting

NAME OF PERSON PREPARING REPORT: David H. Kincaid, P.G.
Principio Environmental Services, Inc.
578-3889
(Name, Organization, Phone No.)

NOTE ATTACH AS-BUILT MW CONSTRUCTION DIAGRAM AND LITHOLOGIC LOG.
(NGVD) NATIONAL GEODETIC VERTICAL DATUM OF 1929 (BLS) = BELOW LAND SURFACE

Alafaya Woods MW-5 Lithologic Log

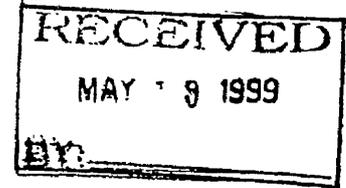
<u>Depth</u>	<u>Lithology</u>
0-1 feet	Light brownish-gray fine sand (Sp)
1-7 feet	Tan fine sand (Sp)
7-15 feet	Light gray fine sand (Sp)

Boring terminated at 15 feet below land surface

Notes: New well MW-5 was installed to replace previously existing MW-5, which was damaged during mowing activities at the site. The new well was installed approximately 4 feet from the original well location. The original MW-5 well was abandoned by Groundwater Protection, Inc. at the time of new well installation. Abandonment was accomplished by grouting to land surface with Type I neat portland cement.

Associated Land Surveying & Mapping, Inc.

101 Wymore Road, Suite 110
Altamonte Springs, Florida 32714
Phone: (407)869-5002 Fax: (407)869-8393



May 17, 1999

Utilities, Inc. of Florida
200 Weathersfield Avenue
Altamonte Springs, Florida 32714

RE: Monitoring Wells

Wedgefield Monitoring Well
New Well # 4
Top 2" PVC set in 2'X2' concrete pad - Elevation 67.36
Ground Elevation - 67.45 (Both Orange County Datum)

Alafaya Utilities
New Well # 5
Top 2" PVC - Elevation 84.22
Ground Elevation - 81.46 (Both Seminole County Datum)

Sincerely,

A handwritten signature in black ink, appearing to read "David M. McDermott".

David M. McDermott
Florida Registered Surveyor and Mapper
Certificate No. 4779

job 98072-1
5-14-99

ALAFAYA UTILITIES, INC.

AN AFFILIATE OF UTILITIES, INC.

200 WEATHERSFIELD AVENUE

ALTAMONTE SPRINGS, FLORIDA 32714

CORPORATE OFFICES:

2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919

Florida: 800-272-1919

Fax: 407-869-6961

florida@utilitiesinc-usa.com

Hand Delivery

February 19, 2002

Ms. Kalina Warren, Supervisor
Wastewater Compliance/Enforcement
Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, FL 32803-3767

Re: Alafaya Utilities, Inc.
OCD-C-WW-02-0117
Noncompliance Letter Dated 2/07/02

Dear Ms. Warren:

As you know, we are in receipt of the referenced letter and have immediately addressed certain items. We are also proceeding with various activities and work efforts to address all of the items and concerns contained in the letter. The purpose of this letter is to provide a written report to the Department as regards the West plant "malfunction" and subsequent repair work performed at this plant.

The West plant clarifier mechanism failed on 12/17/02 due to a failure of the clarifier floor which resulted in the binding of the clarifier sludge scrapers. Flows were immediately diverted to the East plant and investigations begun as to the nature of the problem. By the way, each plant is designed and permitted for a capacity of 1.10 MGD and our current ADF is a little less than 1.0 MGD. FDEP was immediately informed of this situation by our company via facsimile and telephone. Copies of those facsimiles will be provided to you if you should so desire.

The corrective actions taken were as follows:

1. De-watering the plant tankage and transferring its contents to the East plant.
2. Pressure grouting underneath the clarifier floor.
3. Removing the clarifier mechanisms and broken drive.
4. Installing a new clarifier floor.
5. Replacing the clarifier mechanism and refurbishing the drive.

The West plant was put back in service on 1/17/02 and has been on line ever since. Item # 9 of the Department's letter addresses odors reported by an area resident. We have not received any odor complaints to date and would like to know the location of the residence with respect to the plant site. I

Ms. Kalina Warren, Supervisor
February 19, 2002

would not doubt that some odors did occur after the plant was restarted. However, the last odor compliant we are aware of occurred on 11/8/01.

Please be assured that we are aware of the concerns as regards odors and are evaluating what further actions can be taken to minimize them. If you should have any questions, please contact me.

Sincerely,

ALAFAYA UTILITIES, INC.



Gerald Chancellor, P.E.
Regional Manager

GC/ml

Enclosures

cc: Don Rasmussen, V.P., UIOF
Scotty Haws, Ass't. Oper. Mgr., UIOF

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Hand Delivery

February 19, 2002

Ms. Christianne C. Ferraro, P. E.
Water Facilities Administrator
Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, FL 32803-3767

Re: Seminole County-DW
Alafaya Utilities WWTF
Noncompliance Letter of 2/7/02

Dear Ms. Ferraro:

We are in receipt of the Department Letter of February 7, 2002 (Letter) referenced above. We are currently addressing each of the concerns as identified in the letter and have provided a current status of each item within this correspondence. It is our intent to provide a timely update to the Department. Because we are dependent upon information from third parties, we will provide additional and more complete information regarding some items as noted in this correspondence in the immediate future, under separate cover letter.

We provide the following responses for your consideration, based upon the issues raised in the Letter. The items discussed below are presented in numerical correlation to the Department's Letter.

1. We are in the process of obtaining the requested bench sheets from the outside laboratory we utilize for this work. Our initial review indicates that the laboratory held the samples too long and we did not take note of their error. We will provide the Department with analysis and associated actions to improve the situation once we have all of the information.
2. We have taken actions to ensure the calibration of the colorimeter and its usage will be in accordance with the manufacturer's recommendations. The proper procedure is being reviewed with the lead operator by his immediate supervisor. This will be properly performed in the future.
3. The HACH standards and proper verification is required on a quarterly basis. We have taken measures to ensure the proper procedure is being reviewed with the lead operator by his immediate supervisor.

Ms. Christianne C. Ferraro, P. E.

February 19, 2002

4. The 10/00 and 11/00 DMRs did not contain the weekly sampling events results for the last week of October and the first week of November because the Lead operator failed to record the results on the DMR form. The weekly nitrate samplings ^{were} ~~apparently not~~ taken during April, August, and September 2001 are being investigated to determine the reasons for this oversight or if the results simply were not reported.
5. The annual reuse report was submitted on a timely basis to FDEP, Tallahassee. Enclosed please find a copy for your records.
6. The operational problems noted in this item have been addressed and are being/have been resolved. The short-circuiting noted was due to holes at the bottom of the inner separation wall, caused by the diffusers rubbing against this wall over several years. These holes were repaired during the repair of the west plant clarifier.
7. The CCCs have been cleaned and equipment obtained on site to facilitate future cleaning on a regular basis, as may be necessary.
8. Please refer to the separate letter enclosed, which provides a complete report of this work.
9. The utility staff at Alafaya and the operations office in Altamonte Springs have not received any odor complaints since 11/8/01 for this facility. It is indicated that excessive odors were noted by the Department on three occasions, after normal business hours on the 16th, 24th, and 25th of January 2002. Please advise who at the Department performed these "Complaint Inspections," as we would appreciate the opportunity to discuss same with the inspector. Our staff at the WWTF does not recall nor have any records of these inspections. There is also no record of an inspector on the plant site on those dates. Our site is kept secure and access must be obtained through our staff.
10. The TRC result reported on the 10/00 DMR is duly noted.
11. The TSS results for the public access reuse system as reported to the Department on the DMRs are duly noted. Further investigations of these occurrences are being conducted by management.
12. We have reviewed this matter and the issues with which it is concerned. In response, we would offer the following for the Department's consideration:
 - a. There may be a misunderstanding as regards RIBs 1, 2, 3, 4 and 5. These are not five separate ponds, but one large pond (2, 3, 4 & 5) with a small pond (1) adjacent to Boston Cemetary Road. The small pond is not loaded at all, but serves as a buffer to the road. When water is evident in this small pond, loading of the large pond should cease. Enclosed please find a layout of the p/e pond site marked up to illustrate this situation.
 - b. As regards RIBs 10 and 8, please note the lead operator's comments and his recollection of the FDEP inspections, enclosed and dated 2/17/02. He does not seem to be of the opinion that RIB 10 leached offsite.
 - c. A malfunction report was not made to the Department on 8/8/01 as indicated, but was made verbally on 8/12/01 and a written report filed with the Department on 8/13/01. A copy of that facsimile is enclosed for your reference. We are also enclosing the rainfall records kept by the operations staff of the amounts recorded at the p/e pond site. Please note that on 8/11/01, 2.0 inches fell and on 8/12/01, 0.90 inches was recorded. Based upon our knowledge of the area, the amounts of rainfall recorded, and the lack of an adequate stormwater drainage system for Boston Cemetary Road, we believe that the malfunction report may have been in error. However, we are still investigating this issue and, upon completion of our evaluations, will address it with the Department.

Ms. Christianne C. Ferraro, P. E.
February 19, 2002

- d. The issue of the Rapid Infiltration Basins (RIBs), their operations, and possible leaching are being evaluated and investigated by management. It would be our intent to address this issue separately and in subsequent correspondence to the Department.
13. The lack of proper data entry on the residuals transportation records has been addressed with our staff. We have reviewed existing procedures to ensure compliance with Department requirements. We do not expect this error to occur again.
14. The results of the file review by the Department and items 4 and 11 contained in your letter have been addressed with staff. We have taken the necessary steps to ensure that this does not occur in the future.
15. The ground water monitoring concerns and the sample results reported as listed in this item are currently being reviewed with the operations staff and management. Upon completion of these activities, we will be able to address these issues and the concerns of the Department. This work will be performed in the immediate future and addressed by a separate letter report to the Department.

Please be assured that the operations staff and management of Alafaya Utilities are and will be making every effort to correct and address the matters contained in the noncompliance letter. We appreciate the opportunity to meet with the Department today and will proceed to resolve these issues, hopefully, to the satisfaction of all concerned.

In the interim, if you should have any questions, please contact Gerald Chancellor or myself. Thank you for your time and assistance.

Sincerely,

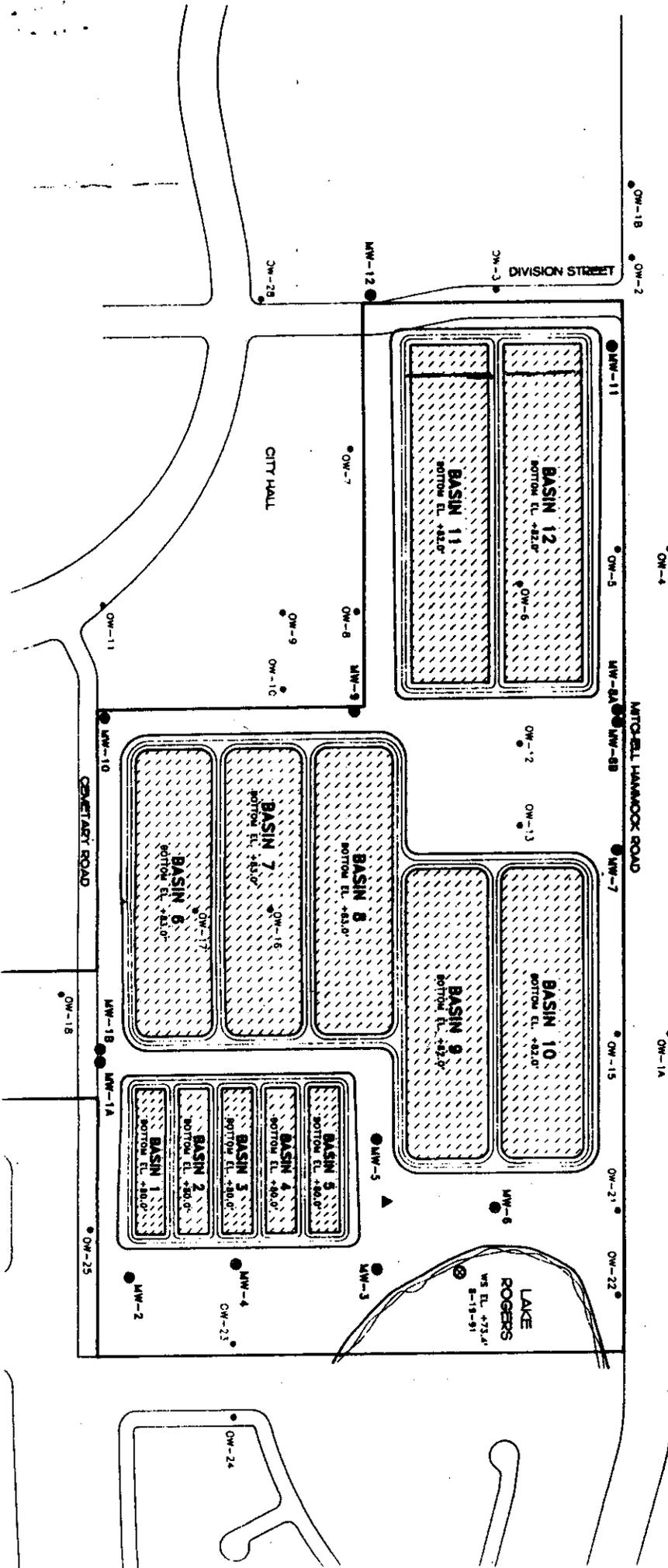
ALAFAYA UTILITIES, INC.



Don Rasmussen, V.P.

DR/ml

Enclosures



ALAFAYA UTILITIES, INC.

AN AFFILIATE OF UTILITIES, INC.

200 WEATHERSFIELD AVENUE

ALTAMONTE SPRINGS, FLORIDA 32714

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Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961
florida@utilitiesinc-usa.com

March 18, 2002

Christianne C. Ferraro, P.E.
Water Facilities Administrator
Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

RE: Alafaya Utilities WWTF
Follow Up Response to Outstanding Items
Noncompliance Letter of 2/07/02

Dear Ms. Ferraro:

We were pleased to meet with you at your offices on February 19, 2002, to discuss the Department of Environmental Protection's letter of 2/7/02 regarding our Alafaya WWTF. At that time, we provided you with a letter addressing each of the points raised in your 2/7/02 letter. We recognize that the results of the Department's evaluation of our 2/19/02 letter and submitted information have not yet been received by the utility. However, we are committed to remaining diligent in correcting the issues as identified by the Department in a timely manner and communicating our progress to you.

The purpose of this letter and its enclosure is to provide additional information regarding three specific areas as identified in both the 2/7/02 Department letter and our 2/19/02 meeting with the Department. Those areas are: the operation and maintenance of the Rapid Infiltration Basins (RIBs or p/e ponds), the question of odors at the WWTF, and the groundwater monitoring and reporting at the pond site. In our meeting of 2/19/02 at your offices, and our earlier letter of 2/19/02, we believe we have addressed the other items contained in the Department's letter of 2/07/02.

Since our meeting of 2/19/02, we have reviewed the overall operations and maintenance of the p/e ponds. We also met with Department personnel at the pond site on 2/26/02. The results of our review and evaluations are as follows:

- a. The rotation of the ponds, and the resting/loading cycles were not being properly performed in accordance with the protocol established in 1995 by the utility and the Department. We have taken the appropriate actions with our operations staff to ensure that proper procedures and protocol are performed.
- b. The hydraulic loading of the individual pond cells and the site as a whole were not being performed in accordance with the 1995 protocol. The lead operator, as he explained during the Department's site visit, was loading the individual cells until "leaching" was observed at the outside toe of the pond berm. At that time, he would then cease loading that cell and begin loading another. We have reviewed the proper loading and rotation procedures with the operations staff. In addition, we will increase the monitoring by management to ensure these procedures are followed.

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19.647

- c. Routine pond maintenance methods have been reviewed with the operations staff and will be monitored by management. Specifically, pond cells 1-5 will be scraped and refurbished by an outside contractor in the immediate future.
- d. The settlement agreement of October 1994, between the utility and the Department addressed the re-grading of the north and south perimeter/boundaries of the p/e pond site to eliminate the potential for the groundwater mound to "daylight" in these areas. The work that had been performed appears to be insufficient, however, and the utility fully intends to do additional work in the coming weeks.

In our opinion, the corrective actions taken and the operational procedures, which have been re-established and are being performed now, will preclude the occurrences of the past six months at the p/e pond site. As stated above, the utility will also proceed with the activities outlined in #4, as envisioned in the settlement agreement. We believe that upon completion of this work, and the proper hydraulic loading and rotation schedules being followed, that the p/e pond site is capable of disposing of 1.0 MGD, as currently permitted.

The question of odors at the WWTF site has been investigated and reviewed with the operations staff. As indicated in our earlier letter, the utility did not receive any odor complaints during the time period referenced in the Department's letter. Our last complaint was on 11/08/01. The utility has initiated daily odor monitoring and is now maintaining a separate logbook of any odors noted, the time and location. In addition, deodorizing blocks are being utilized in the onsite master lift stations and influent structures as a precautionary measure. At present, we believe that the issue of odors is being adequately addressed by the utility. If the Department receives any complaints in the future, we would appreciate being advised and allowed to participate with your staff in the investigation.

Item #15 contained in the 2/07/02 Department letter addressed several groundwater reporting, monitoring, and past analysis results that are of concern. The following responses labeled a. through h. correlate to the Department's #15a. through h.

- a. It is our opinion, based upon our evaluation of the TDS concentrations, that the contract laboratory performing the sampling and analyses was not properly purging and sampling the monitoring wells. The utility has terminated the services of this laboratory and engaged Advanced Environmental Laboratories of Tampa, Florida. This laboratory will be sampling all of the monitoring wells within the next ten days.
- b. We have reviewed the methods previously being employed and have concluded that purging and sampling methods were not satisfactory. The physical conditions of all of the monitoring wells are being investigated and proper techniques utilized by the new laboratory. If it is determined that the wells need to be redeveloped or perhaps replaced, it is our plan to do so. We believe that the turbidity measurements will be reduced below 20 NTUs.
- c. Again, we have determined that the laboratory employed previously, caused the fecal coliform exceedances due to contaminated sampling equipment. Based upon our evaluations it would appear that when a peristaltic pump was utilized for sampling exceedances occurred. However, when a bailer was employed, sample results were satisfactory.

Christianne C. Ferraro, P.E.
Florida Department of Environmental Protection
Re: Alafaya Utilities WWTF
Noncompliance Letter of 2/07/02

- d. We suspect that the elevated chloride concentrations are due to inadequate purging of the wells over the past few years and a buildup of chlorides in the soils around the wells. We will continue our investigations into this item and in addition, we are sampling the effluent for chlorides at this time.
- e. After reviewing bench sheet data from the contracted laboratory which measured the ground water levels, it was determined that the laboratory had miscalculated the depths to ground water elevations, as was subsequently reported in error to the Department. Please see the enclosed table labeled Attachment "A".
- f. The groundwater elevations reported by the laboratory for certain monitoring wells were in error. We have reviewed this matter and prepared Attachment "A", enclosed herein, which lists the correct elevations for the wells in question. Please note that for MW 9, and MW 1B, the groundwater depth is shown as being above the ground surface elevations, in June and August, 2001 respectively. These two wells are located in areas that may have standing water on the ground surface due to rainfall events and the lack of positive drainage, not that the groundwater elevations were at ground surface.
- g. This item was responded to at our meeting of 2/19/02 and the corrected data was provided to the Department at that time.
- h. Again, this item was discussed at our meeting referenced above and a site map furnished to the Department.

As discussed with the Department, it is our belief that the unacceptable results and exceedances that occurred were primarily due to poor flushing and sampling methods employed by the contract laboratory, which was performing this work on behalf of the utility. Management has terminated that laboratory and engaged a new company to perform same in the future. We are also investigating the physical conditions of the groundwater monitoring wells, to determine if certain wells should be replaced or repaired. We will advise the Department of the results of these activities and coordinate the replacement of any wells with the groundwater section.

In conclusion, Alafaya Utilities has and is taking those corrective actions and steps needed to satisfactorily resolve the above referenced issues and the other items of concern, as set forth in the 2/07/02 Noncompliance Letter. We trust that you would agree, and the assistance of the Department is appreciated. If you should have any questions, please contact Gerald Chancellor, P.E. or myself.

Sincerely,
ALAFAYA UTILITIES, INC.



Donald Rasmussen
Vice President

DR/jkw

Enclosure as stated
ec: Gerald Chancellor, Susan Fortino, Scotty Haws

Attachment "A"

Monitoring Well Number	Top of Casing Elevation (NGVD)	Ground Surface Elevation (NGVD)
MW-1	26.37	26.34
MW-1B	85.42	82.90
MW-4	82.14	80.10
MW-7	85.51	83.20
MW-9	85.50	83.10

Well MW-1		
Sample Date	Depth to Groundwater (FT)	Groundwater Depth (NGVD)
2/29/00	2.10	24.27
5/11/00	4.6	21.77
9/9/00	3.9	22.47
12/18/00	7.4	18.97
2/7/01	3.07	23.3

Sample Date	Well MW-1		Well MW-1B		Well MW-4	
	Depth to Groundwater (FT)	Groundwater Depth (NGVD)	Depth to Groundwater (FT)	Groundwater Depth (NGVD)	Depth to Groundwater (FT)	Groundwater Depth (NGVD)
6/6/01	2.8	23.57	2.2	83.22	4.7	77.44
8/20/01	4.6	21.77	4.5	80.92	6.7	75.44
10/29/01	0.11	26.26	5.67	79.44	2.92	79.24

Sample Date	Well MW-7		Well MW-9	
	Depth to Groundwater (FT)	Groundwater Depth (NGVD)	Depth to Groundwater (FT)	Groundwater Depth (NGVD)
6/6/01	3.8	81.71	2.4	83.10
8/20/01	3.2	82.31	2.10	83.4
10/29/01	4.4	81.11	2.75	82.75

ALAFAYA UTILITIES, INC.
AN AFFILIATE OF UTILITIES, INC.
200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

FAXED
8/13/02
na

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961
florida@utilitiesinc-usa.com

Via Facsimile and U.S. Mail

August 13, 2002

Ms. Lynn Lukacs
Groundwater Section
Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, FL 32803-3767

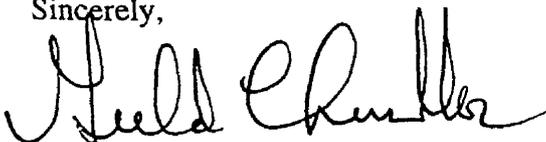
Re: Items g and h, FDEP Non-Compliance Letter dated 2/7/02

Dear Ms. Lukacs:

In accordance with our telephone discussion of yesterday a.m. and your facsimile request, please find enclosed copies of the items submitted with our 3/18/02 response letter to the Department.

Please call me if you should have any additional questions, or we can be of further assistance.

Sincerely,



Gerald Chancellor, P.E.
Regional Manager

GC/ml

Enclosures

cc: Don Rasmussen, V.P., UIOF
Scotty Haws, Ass't. Oper. Mgr., UIOF

GROUNDWATER MONITORING REPORT - PART D
Alafaya Woods Effluent Disposal Area

Permit Number: FLA011074 QW 105870434 Test Site: 6253
 Sample Period From Month/Year: Oct 00 To Month/Year: Dec 00 Well Type: Compliance
 Date Sample Obtained: 12/18/00 Ground Water Class: C-II
 Was the well pumped before sampling? yes no Well Name: MF-2

Parameter	Storet Code	Sampling Method	Samples Filtered (Y/N)	Preserv Added	Analysis Method	Analysis Results (Units)	Detection Limits (Units)
H2O Lev.	82545	NA	N	NA	NA	82.76	NA
Nitrate	620	GRAB	N	4°C	353.3	0.02 U	0.02 mg/L
TDS	70304	GRAB	N	4°C	160.1	586.0	1.0 mg/L
Chloride	940	GRAB	N	4°C	325.2	187.0	5.0 mg/L
Fc Coli	31611	GRAB	N	4°C	9222D	1 U	1.0 cfu's
pH	406	NA	N	4°C	Field	6.9	Standard Units
Turbidity	82079	GRAB	N	4°C	180.1	4.32	0.05 NTU

D - Material was analyzed for but not detected. The value reported is the minimum detection limit.

Comments and Explanation:

FIELD SHEET FOR MONITOR WELL COLLECTION

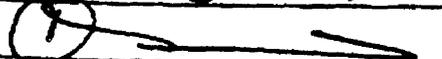
Client: <u>Utilities Inc.</u>	Contact: <u>Charlie Forehand</u>
Project Name: <u>Alafaya Woods Effluent Disposal Area</u>	Date Collected: <u>12-18-00</u>
Address:	Time Collected: <u>1120</u>
Well ID: <u>MW-9</u>	# Containers: <u>2</u>

WELL SPECIFICATIONS		WELL EVALUATION METHOD	
Diameter:	: <u>2</u> in.	Handbailed	: <u> </u>
Total Depth	: <u>17.9</u> ft.	Peristaltic Pump	: <u> </u>
Water Level	: <u>2.9</u> ft.	Submersible Pump	: <input checked="" type="checkbox"/>
Column Height	: <u>15</u> ft.	Centrifugal Pump	: <u> </u>
Column Volume	: <u>2.4</u> gal	Other	: <u> </u>
EVACUATION		SAMPLING METHOD	
Main EPA SX	: <u>12.2</u> gal	Bailer	: <input checked="" type="checkbox"/>
Actual	: <u>13.0</u> gal	Grab	: <u> </u>
GWL Above MSL	: <u>82.74</u> ft.	Submersible Pump	: <u> </u>
FIELD PARAMETER		SAMPLE APPEARANCE	
Temperature	: <u>23.2</u> c	Tint	: <u>Light</u> Medium Dark
Conductivity	: <u> </u> Umhos/25C	Color	: <u>Colorless</u> Gray Yellow Orange Brown Black Green
pH	: <u>6.7</u> Units	Turbidity	: <u>Clear</u> Mild Medium Heavy
		Odor	: <u>None</u> Slight Mild Strong
		Description Odor	: <u>Unknown</u>

Well Location: Client Map - Our Map - Other (Explain):

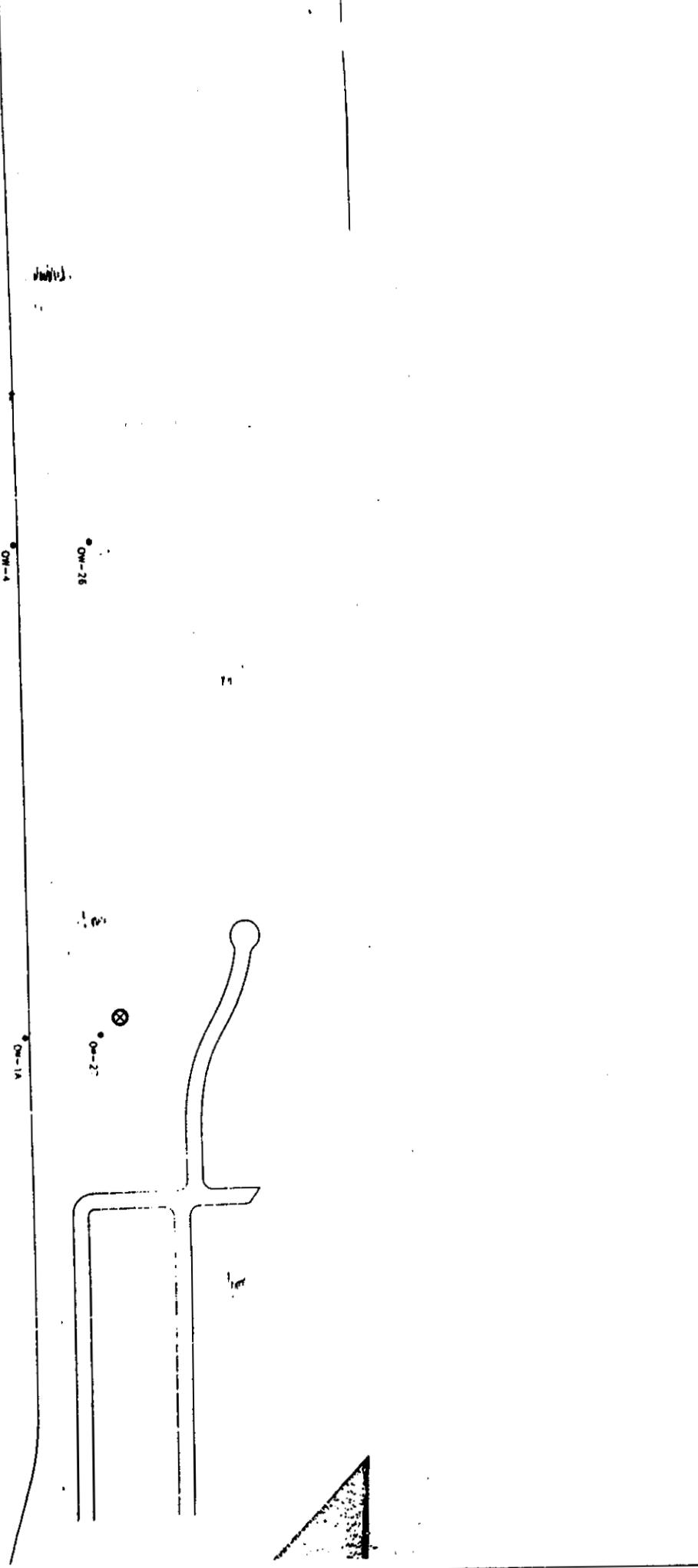
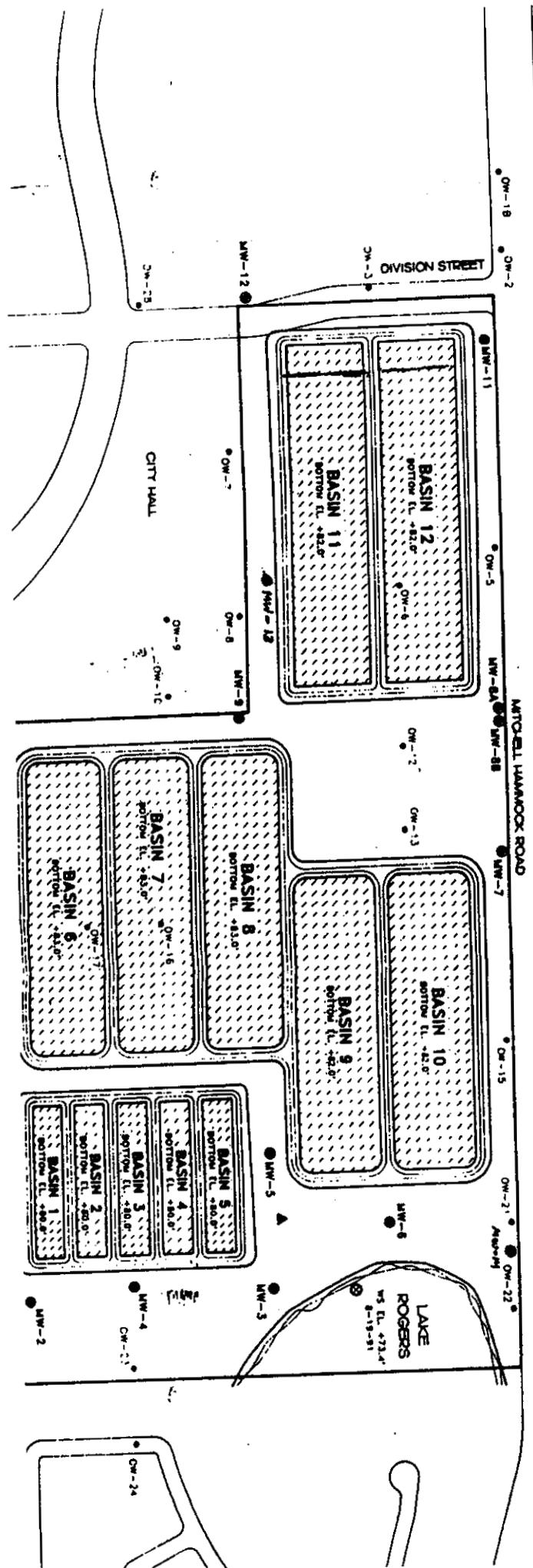
Miscellaneous Comments: Bailer cleaned on 12-18-00

Samples Obtained By (Print): Charles T. Sullivan

Signature of Field Representative: 

Coring Diameter: 1 in. 2 in. 3 in. 4 in. 6 in. 10 in. 12 in. 14 in.
 Volume Gal/Ft: 0.041 0.17 0.34 0.51 0.68 1.36 2.04

PAGE 02



ALAFAYA UTILITIES, INC.

Docket No. 020408-SU

Response to Staff's First Data Request

Dated: October 31, 2002

Item 3 (a)

***Utility's Response to FDEP Letter
Dated August 8, 2002***

ROUTE: ~~22~~ SH —
DR —
FILE



October 8, 2002

Tricia Williams
Domestic Waste Division
Florida Department of Environmental Protection
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803

CPH Engineers, Inc.
1117 East Robinson Street
Suite C
Orlando, Florida 32801
Phone: 407-425-0452
Fax: 407-648-1036
www.cphengineers.com

RE: Alafaya WWTF Permit Renewal
CPH Project No.: U0723

Dear Tricia:

In response to your request for additional information, we offer the following:

FDEP Comment: Please be advised that in Section 2, Item 5 on page 2A-6, of the wastewater application Form 2A, fecal coliform treatment levels do not reflect the high level disinfection criteria required for R002.

Response: This item has been changed to reflect high-level disinfection requirements. A revised Page 2A-6 is attached.

FDEP Comment: Please provide information related to the accuracy of the flow data reported in the discharge monitoring reports (DMR's). Also, indicate whether flows were measured by a flow meter or other method, the location of the flow meter, the last date of calibration, and the person who performed the calibration.

Response: Figure 1 shows the location of the flow-meters at the plant. The latest calibration data for the meters is attached as requested. The reported flow is based on the Facility effluent meters, one to the percolation ponds and one to the public access reclaimed system.

FDEP Comment: The Permitted Capacity Section of the Capacity Analysis Report (CAR) should address permitted capacities for each reuse system.

Response: During a review of the CAR, some errors were noticed in the flow projections in this report in relation to the plant flow projection and the future reuse demands. The report is being revised to reflect the most current data and flow projections. The revised CAR will be submitted with the OMPR as discussed in the next response.

FILE: 647.2.6 / OPERATING PERMIT RENEWAL 2002



FDEP Comment: Please submit an Operation and Maintenance Performance Report (OMPR), as required by Rule 62-600.735, F.A.C., and Section 8.3.a. of the permit application Form 2A, that has been prepared using the Guidelines for Preparation of Operation and Maintenance Performance Reports.

Response: The Operation and Maintenance Performance Report (OMPR) is not included in this submittal. The Utility would like to schedule a meeting with the Department staff to discuss items related to the OMPR and the effluent disposal system, specifically regarding the permitting of a wet weather discharge for the Facility. We would prefer to meet with you to discuss the feasibility of the wet weather discharge and what you will require to permit it. We will prepare the OMPR afterwards for your review.

FDEP Comment: The OMPR should address the reuse systems, including the need for additional wet weather storage, the use of isolated reuse storage ponds, or other means of preventing unpermitted surface water discharges.

Response: Please see previous response.

If you have any questions regarding this project please contact me at (407) 425-0452. Thank you.

Sincerely,
CPH ENGINEERS, INC.

A handwritten signature in black ink, appearing to read "Steve Romano", is written over the printed name and title.

Steve Romano, P.E.
Project Manager

Cc: David Orr, Operations Manager – Alafaya Utilities

SECTION 2. TREATMENT FACILITY DESCRIPTION

1. Description

An existing 2.4 MGD AADF advanced domestic wastewater treatment plant consisting of two 1.2 MGD AADF extended aeration treatment plants operating in parallel with three common influent storage tanks with manual screening and grit removal, aeration, secondary clarification, and chlorination with a splitter box side stream from each plant to the 1.0 MGD tertiary filters and chlorine contact chambers.

2. Treatment Codes

JS, S, ASS, FS, PG, IP, DA

3. Design Capacity of the Treatment Facility

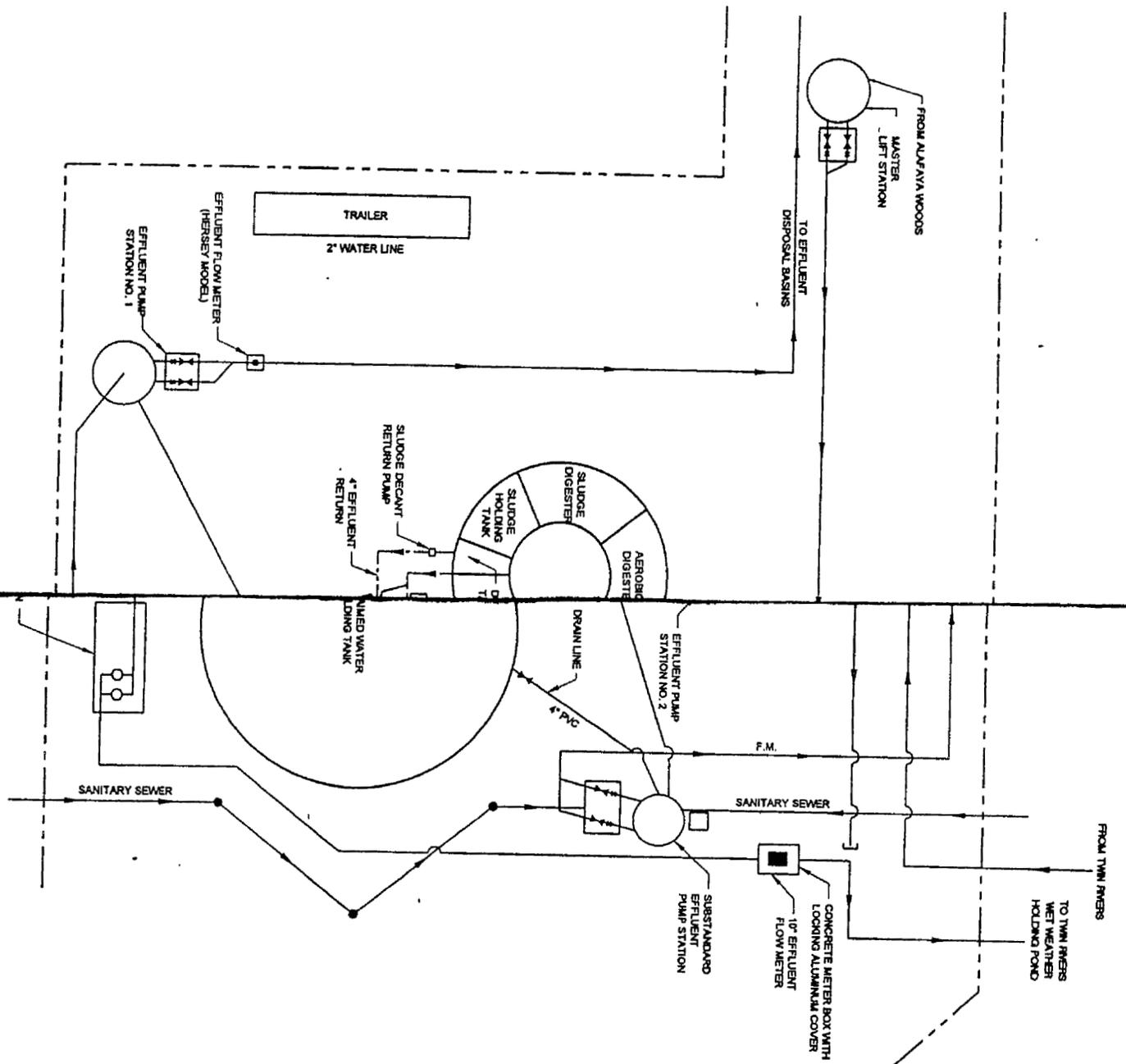
Current Design Capacity	2.400	mgd
Proposed Incremental Design Capacity	+0.000	mgd
Proposed Total Design Capacity	=2.400	mgd

4. Basis of Design Flow

- Annual Average Daily Flow
- Maximum Monthly Average Daily Flow
- Three-Month Average Daily Flow
- Other . If other, specify

5. Design Treatment Levels

Parameter	Effluent Concentration	Units	Basis	Percent Removal
pH	6-8.5	Standard Units		
CBOD ₅	20	mg/L	Annual Average	90%
TSS	5	mg/L	Annual Average	90%
Fecal Coliform	0 ct, 75% of samples	Fecal value/100 ml		
NO	12.0	mg/L		
Cl	1.0	mg/L	15 min @ pHF	



Engineers
 Planners
 Landscape Architects
 Surveyors
 Construction Management
 www.cphengineers.com
 1117 East Robinson Street, Suite C, Orlando, FL 32801
 Phone: 407.425.0452 Fax: 407.648.1036

Scale: NONE
 Date: 9-30-02
 Job No.: U0723
 Certificate of Authorization
 No. 3215

ALAFAYA WWT
 SITE PLAN AND FLOW DIAGRAM
 ALAFAYA UTILITIES, INC.
 OPERATION PERMIT RENEWAL

Sep 13 02 11:14a

P. 2

09/13/2002 11:00 3867382692

MCMAHAN CONST CO INC

PAGE 02

CALIBRATION CERTIFICATE

Model 285-1400 Pipe I.D. MM 406 Inches 16
Serial Number: D1W013363 Sensor S/N: A383

Mean Velocity Units:

- FPS
- CMS
- _____

	Static Velocity	Dynamic Velocity
Standard:	<u>Zero</u>	<u>1.95</u>
Measured:	<u>0.00</u>	<u>1.95</u>

Calibration Method

- MMI Primary Tow Facility
- _____
- Transmitter S/N _____ used in place of customer unit. Adds $\pm 0.10\%$ uncertainty (Model 285 and 282 only).

Sensor Velocity Gain 4.15178 4.15177

Sensor Velocity Zero 0.00 0.00

Calibration Technician: Don Costa 8/7/01

QA Technician: M. J. Kupp 8-7-01

Duplicate cert. issued 8-5-01
This document certifies that the described instrument has been calibrated. Verification is indicated by the measured results shown above. Velocity calibration is traceable to the National Institute of Standards and Technology, (NIST), Gaithersburg, MD. For product information, service, or calibration, please contact the Customer Support Department.



Marsh-McBirney, Inc.
4539 Metropolitan Ct., Frederick, MD 21704-3452
301-874-6399 • 800-368-2723 • FAX 301-874-2173
www.marsh-mcbrney.com



P.O. Box 940989
 MAITLAND - FLORIDA - 32751

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 SEP 12 2002

Calibration Certification

EQUIPMENT NUMBERS IN THIS LOOP 2

CUSTOMER NAME Alafa Utilities STREET 1067 Mckinnon Ave.
 CITY Ovideo STATE Florida

EQUIPMENT LOCATION

NAME Alafaya W.W.T.P. STREET 1067 Mckinnon Ave.
 CITY Ovideo LOOP NAME & No. Influent Flow West

DRAWING No. N/A TAG DESCRIPTION West Flow Meter

MODEL No. ISCO UMC41 S.N. c97h0522& Honeywell Recorder

PERIODIC CALIBRATION START-UP CALIBRATION AFTER REPAIR CALIBRATION

PROCESS RANGE 0-1400 GPM CALIBRATION RANGE _____

INPUT REFERENCE MFG. Application OUTPUT RANGE 4-20 ma.

CALIBRATION CHECK & COMPLETION

INPUT REFERENCE	PRE-CALIBRATION OUTPUT SIGNAL	NEW CALIBRATION OUTPUT SIGNAL	SPECIAL SET-UP
0%		4.0 MA	
10%			
50%			
90%			
1% <u>100%</u>	19.98	20.00	
1%			

REMARKS: CAL. PER MFG. SPEC.

Carroll Kelly AUG. 19, 2002
 SERVICE REPRESENTATIVE DATE



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SEP 12 2002

Calibration Certification

EQUIPMENT NUMBERS IN THIS LOOP 2

CUSTOMER NAME Alafaya Utilities STREET 1067 Mckinnon Ave.
CITY Oviedo STATE Florida

EQUIPMENT LOCATION

NAME Alafaya W.W.T.P. STREET 1067 Mckinnon Ave.
CITY Oviedo LOOP NAME & No. Influent Flow East
DRAWING No. N/A TAG DESCRIPTION East Flowmeter
MODEL No. ISCO UMC41 S.N. C98D4096 & Honeywell Recorder

PERIODIC CALIBRATION START-UP CALIBRATION AFTER REPAIR CALIBRATION

PROCESS RANGE 0-1400 GPM CALIBRATION RANGE _____
INPUT REFERENCE MFG. Application OUTPUT RANGE 4-20 ma.

CALIBRATION CHECK & COMPLETION

INPUT REFERENCE	PRE-CALIBRATION OUTPUT SIGNAL	NEW CALIBRATION OUTPUT SIGNAL	SPECIAL SET-UP
0%		4.0 MA	
10%			
50%			
90%			
% <u>100%</u>	<u>19.89</u>	<u>20.0 MA</u>	
%			

REMARKS: CAL. PER MFG. SPEC.

Ronald Kelly
SERVICE REPRESENTATIVE

AUG. 19, 2002
DATE



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 SEP 12 2002

Calibration Certification

EQUIPMENT NUMBERS IN THIS LOOP 2

CUSTOMER NAME Alafaya Utilities STREET 1067 Mckinnon Ave
 CITY Oviedo STATE Florida

EQUIPMENT LOCATION

NAME Alafaya W.W.T.P. STREET 1067 Mckinnon Ave.
 CITY Oviedo LOOP NAME & No. Re-Used Flow

DRAWING No. N/A TAG DESCRIPTION Turbidity Effluent

MODEL No. HACH-Aquatrend S.N. Honeywell Chart Recorder

PERIODIC CALIBRATION START-UP CALIBRATION AFTER REPAIR CALIBRATION

PROCESS RANGE 0-2 NTU CALIBRATION RANGE 0-2

INPUT REFERENCE Standard OUTPUT RANGE 4-20 ma

CALIBRATION CHECK & COMPLETION

INPUT REFERENCE	PRE-CALIBRATION OUTPUT SIGNAL	NEW CALIBRATION OUTPUT SIGNAL	SPECIAL SET-UP
0%	-0-	-0-	DI water
10%			
50%			
90%			
%	20 NTU	20 NTU	STANDARD of
%			20 NTU

REMARKS: CAL. PER MFG. SPEC. USING 20 NTU.

Ronald Kelly

AUG. 19, 2002

SERVICE REPRESENTATIVE

DATE



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SEP 12 2002

Calibration Certification

EQUIPMENT NUMBERS IN THIS LOOP 2

CUSTOMER NAME ALAFAYA UTILITIES STREET 1067 MCKINNON AVE
CITY OVIEDO STATE FLORIDA

EQUIPMENT LOCATION
NAME ALAFAYA W.W.T.P. STREET 1067 Mckinnon Ave.
CITY Oviedo LOOP NAME & NO. _____

DRAWING NO. N/A TAG DESCRIPTION PH Effluent Flow
MODEL NO. HACH EC1000 S.N. & Honeywell Chart Recorder

PERIODIC CALIBRATION START-UP CALIBRATION AFTER REPAIR CALIBRATION

PROCESS RANGE 0-14 PH CALIBRATION RANGE _____
INPUT REFERENCE 4 and 7 Buffer Std. OUTPUT RANGE 4-20 ma.

CALIBRATION CHECK & COMPLETION

INPUT REFERENCE	PRE-CALIBRATION OUTPUT SIGNAL	NEW CALIBRATION OUTPUT SIGNAL	SPECIAL SET-UP
0%			
40%	3.89	4.0	4.0 PH STANDARD
50%			
90%			
7%	6.95	7.0	7.0 PH STANDARD
0%			

REMARKS: PASS CAL. CHECK

Donald Kelly AUG 19, 2002
SERVICE REPRESENTATIVE DATE



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RECEIVED
SEP 12 2002

Calibration Certification

EQUIPMENT NUMBERS IN THIS LOOP 2

CUSTOMER NAME ALAFAYA UTILITIES STREET 1067 MCKINNON AVE

CITY OVIEDO STATE FLORIDA

EQUIPMENT LOCATION

NAME ALAFAYA W.W.T.P. STREET 1067 Mckinnon Ave.

CITY Oviedo LOOP NAME & No. PH for Percolating Flow

DRAWING No. N/A TAG DESCRIPTION

MODEL No. HACH EC1000 S.N. & Honeywell Chart Recorder

PERIODIC CALIBRATION START-UP CALIBRATION AFTER REPAIR CALIBRATION

PROCESS RANGE 0-14 PH CALIBRATION RANGE

INPUT REFERENCE 4 and 7 Buffer Std. OUTPUT RANGE 4-20 ma.

CALIBRATION CHECK & COMPLETION

INPUT REFERENCE	PRE-CALIBRATION OUTPUT SIGNAL	NEW CALIBRATION OUTPUT SIGNAL	SPECIAL SET-UP
0%			
25%	3.9	4.0	4.0 PH STANDARD
50%			
75%			
100%			
10%	6.9	7.0	7.0 PH STANDARD
1%			

REMARKS: PASS CAL.

Ronald Kelly
SERVICE REPRESENTATIVE

Aug. 19, 2002
DATE

ALAFAYA UTILITIES, INC.

Docket No. 020408-SU

Response to Staff's First Data Request

Dated: October 31, 2002

Item 4 (a)

***Utility's Response to FDEP Letter
Dated October 7, 2002***

ALAFAYA UTILITIES, INC.

AN AFFILIATE OF UTILITIES, INC.
200 WEATHERSFIELD AVENUE
ALTAMONTE SPRINGS, FLORIDA 32714

CORPORATE OFFICES:
2335 Sanders Road
Northbrook, Illinois 60062
Telephone: 847-498-6440

Telephone: 407-869-1919
Florida: 800-272-1919
Fax: 407-869-6961
florida@utilitiesinc-usa.com

October 18, 2002

Mr. David Smicherko
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

Re: Noncompliance Letter
Alafaya WWTF
Permit # FLA011074

Dear Mr. Smicherko:

This letter is in response to the noncompliance items noted during a routine compliance inspection held on July 26, 2002 at the above referenced facility. For your reference, the deficiency has been re-typed in bold with our response immediately following. The following deficiencies have been corrected as follows:

- 1) **Since July 15, 2002 effluent has been overflowing from Ekana Golf Course holding pond, which is not authorized by the permit. The discharge enters the Econlockhatchee River via wetlands. The discharge from the holding pond is being addressed during the permit renewal process.**

Due to the excessive rainfall experienced at the RIB site, effluent was discharged to the holding pond. Alafaya Utilities, Inc. utilized proper notification procedures as outlined in the operating permit and coordinated with FDEP prior to commencing the discharge at the holding pond. Effective October 11, 2002 effluent discharge through the overflow of the irrigation holding pond has ceased.

- 2) **The thermometer in the refrigerator, which the samples are stored in, has not been checked against an NIST certified thermometer annually.**

New thermometers were ordered and received on 8/6/02. Daily recording sheets were started and thermometers will be checked against a NIST certified thermometer annually.

Mr. David Smicherko
October 18, 2002

- 3) **The pH meter was not calibrated daily with appropriate buffers. At the time of inspection the pH meter was being calibrated with one buffer.**

Daily calibrations with 4.0 and 7.0 buffers were started on 7/29/02. A 10.0 buffer was ordered and received on 8/5/02. Since that time, daily calibrations with the three buffers have been obtained.

- 4) **The west plant's clarifier was short circuiting effluent through holes in the weir.**

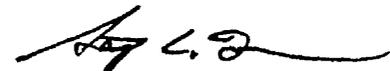
The several holes located in the weir trough are being temporarily repaired. We are scheduling the west plant for rehabilitation and when the plant is taken out of service, permanent repairs will be completed.

It was also noted on the inspection report that excessive odors were noted in front of the wastewater treatment plant on September 30, 2002 near the corner of McKinnon Avenue and Gould Place. Plant personnel were notified the next day of the odors. It was noted the next day that the retention ponds across the street from the plant were being cleaned and the only noticeable odor coming from the wastewater facility was the deodorant, which is applied at the digester, surge tanks, and treatment plants. An odor log is being kept onsite of the wastewater facility. Every effort is being made to minimize odors.

If you should have any questions, or require further information, please do not hesitate to contact me at (407) 869-8588, ext. 234.

Sincerely,

ALAFAYA UTILITIES, INC.



Scotty L. Haws
Assistant Operations Manager

SLH/ml

- ✓ ec: Don Rasmussen, VP, UIOF
David L. Orr, EI, Regional Manager, UIOF
Ron Evans, Area Manager, UIOF