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MARTIN FRIEDMAN

407-310-2077 mfriedman@deanmead.com

#### September 13, 2021 VIA EFILING

Adam Teitzman, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 20210109-WS - Application for amendment of Certificates 496-W and 465-S to extend territory in Lake County, by Utilities, Inc. of Florida. Our Matter No. 077733

Dear Mr. Teitzman:

The following are Utilities, Inc. of Florida's responses to Staff's Deficiency Letter dated August, 24, 2021:

1. Need for Service. Rule 25-30.036(2)(d)1., Florida Administrative Code (F.A.C.), requires that the applicant provide the number of customers currently being served and proposed to be served, by customer class and meter size, including a description of the types of customers anticipated to be served. The application lists the types of customers proposed to be served, and the number of water and wastewater lots, but does not provide the number of customers <u>by class and meter size</u> either currently being served in UIF's certificated territory or proposed to be served in the territory proposed to be added. Please provide this information.

*RESPONSE:* The new service area will be master metered with an 8" meter and will be a general service customer. The number of customers by class and meter size either currently being served in UIF's certificated territory are set forth in Attachment 1 hereto.

Adam Teitzman Page 2

2. **DEP Reports.** Rule 25-30.036(2)(k), F.A.C., requires that the applicant provide a copy of the most recent DEP and/or county health department sanitary survey, compliance inspection report, and secondary standards drinking water report. Please provide a copy of the most recent DEP compliance inspection report.

RESPONSE: See Attachment 2 hereto.

3. Legal Description. Rule 25-30.036(2)(f), F.A.C., requires that the applicant provide a legal description of the territory proposed to be served, in the format prescribed in Rule 25-30.029, F.A.C. In addition, if the extension of territory is adjacent to existing territory, provide a legal description of the resulting territory including both existing and expanded portions in the format prescribed in Rule 25-30.029, F.A.C. In reviewing the legal descriptions for both the resulting water and wastewater territories, staff found that the descriptions improperly included whole sections for which only portions of said sections had been previously approved by the Commission. The specific sections are as follows: Sections 15, 22, 23 and 27 of Township 24 South, Range 26 East. Please revise the referenced territory descriptions for the water and/or wastewater service territories, and the corresponding maps, to comply with the requirements of Rule 25-30.029(2)(b), F.A.C.

RESPONSE: See Attachment 3 hereto.

Should you have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,

<u>/s/ Martin S. Friedman</u> MARTIN S. FRIEDMAN For the Firm

MSF/ Enclosure

cc: Bryan Gongre (via email) Melinda Watts (via email) Walter Trierweiler, Esquire (via email)

# Attachment 1

| Water Residen | tial        | Water General Se | ervice      | Wastewater Resid | dential     | Wastewater Genera | al Service  | Reuse Residen | tial        | Reuse General Se | ervice      |
|---------------|-------------|------------------|-------------|------------------|-------------|-------------------|-------------|---------------|-------------|------------------|-------------|
| Meter Size    | # of Meters | Meter Size       | # of Meters | Meter Size       | # of Meters | Meter Size        | # of Meters | Meter Size    | # of Meters | Meter Size       | # of Meters |
| 5/8"          | 11,901      | 5/8"             | 104         | 5/8"             | 5,113       | 5/8"              | 21          | 5/8"          | 688         | 5/8"             | 4           |
| 3/4"          | 0           | 3/4"             | 0           | 3/4"             | 0           | 3/4"              | 0           | 3/4"          | 0           | 3/4"             | 0           |
| 1"            | 49          | 1"               | 64          | 1"               | 0           | 1"                | 15          | 1"            | 0           | 1"               | 1           |
| 1 1/2"        | 3           | 1 1/2"           | 15          | 1 1/2"           | 0           | 1 1/2"            | 2           | 1 1/2"        | 0           | 1 1/2"           | 0           |
| 2"            | 1           | 2"               | 22          | 2"               | 0           | 2"                | 1           | 2"            | 0           | 2"               | 1           |
| 3"            | 0           | 3"               | 2           | 3"               | 0           | 3"                | 0           | 3"            | 0           | 3"               | 0           |
| 4"            | 0           | 4"               | 3           | 4"               | 0           | 4"                | 0           | 4"            | 0           | 4"               | 0           |
| 6"            | 0           | 6"               | 0           | 6"               | 0           | 6"                | 0           | 6"            | 0           | 6"               | 0           |
| 8"            | 0           | 8"               | 6           | 8"               | 0           | 8"                | 2           | 8"            | 0           | 8"               | 0           |
| 10"           | 0           | 10"              | 0           | 10"              | 0           | 10"               | 1           | 10"           | 0           | 10"              | 0           |

Attachment 2



# FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE 3319 MAGUIRE BLVD., SUITE 232 ORLANDO, FLORIDA 32803 Ron DeSantis Governor

Jeanette Nuñez Lt. Governor

Noah Valenstein Secretary

October 29, 2019

Patrick C. Flynn, Vice President Lake utility Service, Inc. 200 Weathersfield Ave. Altamonte Springs, FL 32714 pcflynn@uiwater.com

Re: Compliance Assistance Offer Lake Groves WWTF DW-Facility FLA01146 Lake County

Dear Mr. Flynn:

An inspection was conducted at your property on October 22, 2019, under the authority of Section 403.091, Florida Statues (F.S.). During this inspection potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Specifically, potential non-compliance with the requirements of Chapter 403, F.S., Chapter 62-620, Florida Administrative Code (F.A.C.) were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the item(s) of concern noted and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

- 1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed
- 2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
- 3. Arrange for the case manager to visit your facility to discuss the item(s) of concern.

It is the Department's desire that you are able adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

Lake Groves WWTF; Facility FLA011146 Compliance Assistance Offer Page 2 of 2 October 29, 2019

Please address your response and any questions to Sean Boyles at the Central District Office at (407) 897-4164 or via e-mail at <u>sean.boyles@floridadep.gov</u>. We look forward to your cooperation with this matter.

Sincerely,

st kohl

Daniel K. Hall, Manager Central District Florida Department of Environmental Protection

Enclosures: Inspection Report

cc: Brian Gongre, Regional Manager, <u>bkgrongre@uiwater.com</u> Dominic Gentilucci, Area Manager, <u>dvgentilucci@uiwater.com</u> James Kilgore, Lead Operator, <u>jakilgore@uiwater.com</u> Sean Boyles, FDEP, <u>sean.boyles@floridadep.gov</u>

#### FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION **WASTEWATER** COMPLIANCE INSPECTION REPORT

| Facility Name and Physical Address      WAFR ID      County |  |           |              |                  |                |                   | Entry Date                    |            |                                   | Entry Time                     |            |            |  |
|---|--|-----------|--------------|------------------|----------------|-------------------|-------------------------------|------------|-----------------------------------|--------------------------------|------------|------------|--|
| Lake Groves WWTF  |  |           |              | FLA              | FLA011146 Lake |                   |                               | 10/22/2019 |                                   | 9:04 AM                        |            |            |  |
| 2425 US Highway 27<br>Clermont, FL 34714                    |  |           |              | Facility Phone # |                |                   |                               | ]          | Exit Date                         |                                | Exit Time  |            |  |
| cienne  |  |           |              |                  | ) 869-         |                   |                               |            |                                   |                                | 10/22/201  | 9          | 11:35 AM                                 |
| LAT   | 28   | 0         | 22           |                  |                | 55.15             | "                             |            |                                   |                                |            |            |  |
| LONG  | 81   | 0         | 41           |                  |                | 35.23             | "                             |            |                                   |                                |            |            |  |
| Name(s) o   | Name(s) of Field Representatives(s) and Title      Operator Certification #      Email |           |              |                  |                |                   |                               |            |                                   |                                |            |            | Phone                                    |
|   | Gentilucci   |           |              |                  | 020            | 7                 |                               |            |                                   | ntilucci@uiwater.              |            |            | (407) 948-9839                           |
| James K<br>John Pag   | 0  |           |              |                  | 930<br>182     |                   |                               |            | jakilg                            | gore@uiwater.cor               | n          |            |  |
|   | Address of Perm  | ittee / D | esignate     | d Rep.           |                | Title             |                               |            | Er                                | mail Phone                     |            |            |  |
| Patrick C   |  |           |              |                  |                | Vice F            | Presiden                      | it p       | cflynn@                           | Quiwater.com                   |            |            | (407) 869-1919                           |
|   | ility Service, l<br>athersfield Av   |           |              |                  |                |                   |                               |            |                                   |                                |            |            |  |
|   | te Springs, Fl   |           | 4            |                  |                |                   |                               |            |                                   |                                |            |            |  |
|   |  |           | 1            | r                | 1              |                   |                               |            | 1                                 |                                |            |            |  |
| Inspection  | і Туре   | С         | E            | Ι                |                | Samp              | les Taker                     | n(Y/N): N  | Sample                            | e ID#: N/A                     |            | Sar        | nples Split (Y/N) : N                    |
| X Dom   | estic 🗆 l  | ndus      | trial        |                  |                |                   |                               |            |                                   |                                |            |            |  |
|   |  |           |              |                  |                |                   |                               |            |                                   |                                |            |            |  |
| IC  |  |           | <i>r</i> 0   |                  | 1.             |                   |                               | IPLIANCE A |                                   |                                |            |            |  |
| IC =  |  |           |              |                  |                |                   |                               |            |                                   | cant out of Complianc          |            |            | cable; NE = Not Evaluated<br>d by a "♦ " |
|   | PERMITS/OI   |           |              |                  | SEI            |                   | ITORIN                        |            |                                   | ILITY OPERATIO                 |            |            | EFFLUENT/DISPOSAL                        |
| IC  | 1. ♦ Permit  |           | Ι            | C                |                | Laborato          |                               | IC         | 6. F                              | acility Site Review            | N          | C          | 9. ♦ Effluent Quality                    |
| IC  | 2. 	Compli   | ance      | 1            | NC               | 4.             | Sampling          | р                             | IC         | 7. F                              | low Measurement                | I          | С          | 10. ♦ Effluent Disposal                  |
|   | Schedule   | s         |              |                  |                |                   |                               |            |                                   |                                |            |            |  |
|   |  |           | 1            | NC               | 5. •           | Record<br>Reports | 10                            |            |                                   | 8.♦ Operation &<br>Maintenance |            | С          | 11. Biosolids                            |
|   |  |           |              |                  |                | repons            |                               |            |                                   |                                | I          | С          | 12. • Groundwater                        |
| NA  | 14. Other  |           |              |                  |                |                   |                               |            |                                   |                                | N          | ĊC         | 13. ♦ SSO Survey                         |
|   |  |           |              |                  |                |                   |                               |            |                                   |                                | İ          |            |  |
| Facility a  | nd/or Order (  | Compli    | ance Sta     | atus:            |                | In-Com            | pliance                       | X          | Out-Of                            | Compliance                     | 🗆 Sign     | ificar     | nt-Out-Of-Compliance                     |
| Recomme   | nded Actions: C  | Compl     | iance        | Assis            | tance          | Offer             |                               |            |                                   |                                |            |            |  |
| Name(s) a   | nd Signature(s)  | of Insp   | ector(s)     |                  |                |                   |                               |            |                                   | District Office/Pho            | one Number |            | Date                                     |
| Sean M. Boyles  |  |           |              |                  |                |                   | CD/ (407) 897-4164 10/23/2019 |            |                                   | 10/23/2019                     |            |            |  |
|   | Ser  | <u></u>   | $\mathbf{h}$ | 1                |                |                   |                               |            |                                   |                                |            |            |  |
|   | Acri   | 76        | Bal          | m                |                |                   |                               |            |                                   |                                |            |            |  |
|   |  |           |              |                  |                |                   |                               |            |                                   |                                |            |            |  |
| Name and Signature of Reviewer                              |  |           |              |                  |                |                   |                               |            | District Office/Phone Number Date |                                | Date       |            |  |
| Daniel K. I   |  |           |              |                  |                |                   |                               |            |                                   | CD/ (407) 897-4167 10/28/2019  |            | 10/28/2019 |  |
| 1   | Juist Kithel   |           |              |                  |                |                   |                               |            |                                   |                                |            |            |  |
| 4   | mer 12%  | na        |              |                  |                |                   |                               |            |                                   |                                |            |            |  |
| 1   |  |           |              |                  |                |                   |                               |            |                                   | 1                              |            |            |  |

| Single Event Violations (*SNC SEVs) |                                   |  |   |               |  |  |
|-------------------------------------|-----------------------------------|--|---|---------------|--|--|
| Check<br>for Yes                    | Evaluation Area                   | Description  | Finding Description   | Finding<br>ID |  |  |
|                                     | Permit                            | Effluent Violations - Unapproved<br>Bypass   | Wastewater was diverted from a portion of the treatment process without department approval.  | UNBY          |  |  |
|                                     | *Permit                           | Permit Violations - Discharge<br>Without a Valid Permit                                    | The facility was operating without a permit or with an expired permit.  | UPHI          |  |  |
|                                     | Permit                            | Permit Violations - Failure to Submit<br>Timely Permit Renewal Application                 | The permittee failed to submit an application to renew the existing permit at least 180 days prior to expiration.   | PFSA          |  |  |
|                                     | Laboratory                        | Management Practice Violations -<br>Laboratory Not Certified                               | The laboratory was not certified by the National Environmental<br>Laboratory Accreditation Conference (NELAC).  | LNCE          |  |  |
|                                     | Sampling                          | Monitoring Violations - Analysis not<br>Conducted  | The facility failed to collect and/or analyze samples as required by permit or enforcement action.  | ANCV          |  |  |
|                                     | Sampling                          | Monitoring Violations - Failure to<br>Monitor for Toxicity Requirements                    | The facility failed to collect and/or analyze routine or follow-up toxicity samples.  | FTOX          |  |  |
|                                     | Records and<br>Reports            | Management Practice Violations -<br>Failure to Develop Adequate SPCC<br>Plan               | The facility failed to develop or maintain their Spill Prevention<br>Control and Countermeasures (SPCC) plan.   | FSPC          |  |  |
|                                     | Records and<br>Reports            | Management Practice Violations -<br>Failure to Maintain Records                            | The facility failed to maintain records for the required retention period.  | FMRR          |  |  |
|                                     | Records and<br>Reports            | Reporting Violations - Failure to<br>Notify  | The permittee failed to notify the department of any event or activity that requires notification as required by permit or rule.                                      | RSWP          |  |  |
|                                     | Records and<br>Reports            | Reporting Violations - Failure to<br>Submit DMRs   | The permittee failed to submit any DMR required by rule, permit,<br>or enforcement action in a timely manner.   | FDMR          |  |  |
|                                     | Records and<br>Reports            | Reporting Violations - Failure to<br>submit required report (non-DMR,<br>non-pretreatment) | The facility failed to submit any report required by rule, permit,<br>enforcement action or inspection activity except for DMRs.                                      | FRPT          |  |  |
|                                     | Facility Site Review              | Management Practice Violations -<br>Improper Land Application (non-503,<br>non-CAFO)       | The land application system was not being maintained.   | LASN          |  |  |
|                                     | Flow Measurement                  | Monitoring Violations - No Flow<br>Measurement Device                                      | The facility failed to install a flow measurement device, an<br>approved flow measurement device, or a working flow<br>measurement device.                            | NOFL          |  |  |
|                                     | Operation and<br>Maintenance      | Management Practice Violations -<br>Improper Operation and Maintenance                     | The facility failed to follow their operation and maintenance plan/manual.  | IONM          |  |  |
|                                     | Operation and<br>Maintenance      | Management Practice Violations -<br>Inflow/Infiltration (I/I)                              | The facility had an inflow and infiltration problem causing collection system issues and/or operational issues.   | ININ          |  |  |
|                                     | Operation and<br>Maintenance      | Management Practice Violations - No<br>Licensed/Certified Operator                         | The facility was being operated without a certified operator or by<br>an operator that is not licensed for the size of plant.   | ONCO          |  |  |
|                                     | *Effluent Quality                 | Effluent Violations - Failed Toxicity<br>Test  | Persistent acute toxicity has been documented through follow-up tests.  | EATX          |  |  |
|                                     | *Effluent Quality                 | Effluent Violations - Failed Toxicity<br>Test  | Persistent chronic toxicity has been documented through follow-<br>up tests.  | ЕСТХ          |  |  |
|                                     | *Effluent Quality                 | Effluent Violations - Failed Toxicity<br>Test  | Persistent acute or chronic toxicity has been documented in the effluent through the use of routine and follow-up tests.  | ЕТОХ          |  |  |
|                                     | Effluent Quality                  | Effluent Violations - Narrative<br>Effluent Violation                                      | The facility violated a permit or enforcement narrative effluent limit.   | XNEV          |  |  |
|                                     | *Effluent Quality                 | Effluent Violations - Reported Fish<br>Kill  | The facility had a discharge of wastewater that resulted in a fish kill.  | XFSH          |  |  |
|                                     | Sanitary Sewer<br>Overflow Survey | WW SSO - Failure to Maintain<br>Records or Meet Record Keeping<br>Requirements             | The facility failed to keep routine documentation and reporting records of spills, and/or operation and maintenance activities on the collection/transmission system. | SSO2          |  |  |
|                                     | Sanitary Sewer<br>Overflow Survey | WW SSO - Failure to monitor  | The facility failed to collect and/or analyze bacteriological samples for sewage spills that reached surface waters.  | SSO3          |  |  |
|                                     | Sanitary Sewer<br>Overflow Survey | WW SSO - Failure to report violation<br>that may endanger public health<br>122.41(l)(7)    | The facility failed to report a sewage spill within 24 hours of discovery.  | SSO4          |  |  |
|                                     | Sanitary Sewer<br>Overflow Survey | WW SSO - Improper Operation and<br>Maintenance   | The facility failed to perform routine preventative maintenance to keep the collection/transmission system in good working order.                                     | SSO5          |  |  |

# **Facility Treatment Summary:**

An existing 0.999 MGD permitted capacity waste water treatment plant, consisting of influent screening, flow equalization, two anoxic/oxic biological treatment units, secondary clarification, filtration, chlorination, and aerobic digestion of residuals with disposal to two rapid infiltration basins (R-001) with 0.5 MGD AADF and a 0.999 MGD AADF slow-rate public access reuse system (R-002).

#### **<u>1.</u>** • **<u>Permit:</u>** In-Compliance

| Current Permit available on-site?  | Yes               |
|------------------------------------|-------------------|
| Date Permit issued                 | May 30, 2012      |
| Date Permit Expires                | May 29, 2022      |
| Permit Renewal Application due by  | November 29, 2021 |
| Administrative or Judicial Orders? | N/A               |

- **1.1** <u>**Observation:**</u> The facility received a permit revision for reduced sampling frequency for Fecal Coliform and Total Suspended Solids at the public access reuse system (R-002) on May 21, 2013.
- **1.2** <u>**Observation:**</u> The facility received a permit revision for odor control at the headworks on March 24, 2014.
- **1.3 Observation:** The facility received a permit revision in September 28, 2018, to construct a SolorOrganite Drying Chamber.

# 2. • Compliance Schedules: In-Compliance

| Compliance Schedule in Permit met?           | Yes |
|--|-----|
| Compliance Schedules in Order are being met? | No  |

- **2.1** <u>**Observation:**</u> The engineering report summarizing any odor testing results and corrective actions to reduce odors was received by the Department on March 24, 2014.
- **2.2** <u>**Observation:**</u> The updated capacity analysis report was received by the Department on May 26, 2017.

#### 3. Laboratory: In-Compliance

| Contract Lab Name            | See Observation |
|------------------------------|-----------------|
| Facility DOH Certification # | See Observation |

- **3.1 Observation:** A copy of the laboratory certification was available and up to date at the time of the inspection.
- **3.2** <u>**Observation:**</u> The facility uses Tri-Tech Laboratories, Inc., certification # E83294. **Additional Comments:** This lab is used for daily samples, composite samples, and monitoring well samples.
- **3.3** <u>**Observation:**</u> The facility uses Flowers Chemical Laboratories, certification # E83018.

Additional Comments: This lab is used for effluent analysis, pathogen monitoring, permit renewal sampling, and any special sampling that needs to be conducted.

#### 4. Sampling: Out-of-Compliance

| Sampling conducted during inspection?                     | No  |
|---|-----|
| Sampling observed during inspection?                      | No  |
| Sampling conducted at locations identified by the permit? | Yes |
| Safe access to sampling locations?                        | Yes |

**4.1** <u>**Deficiency:**</u> Influent sampler is programmed for time proportioned samples, not the flow proportioned samples that is required in the permit.

**Rule/Permit Reference:** Chapter 62-600.660(3)(b), F.A.C.- Grab samples shall be used to test CBOD<sub>5</sub>, TSS, and nutrients at facilities with a permitted capacity less than 100,000 gallons per day. Except as provided in paragraphs 62-600.660(3)(c) and (d), F.A.C., all other samples for CBOD5, TSS, and nutrients shall be flow proportioned, composite samples and compositing periods shall be 24, 16, or 8 hours based on the facility's staffing requirement. In no case shall the compositing period be less than 8 hours.

**Corrective Action:** Install the new signal transmitter and program the influent sampler for flow proportioned sampling. Send documentation of the corrective action to the Department.

**4.2** <u>**Deficiency:**</u> Effluent sampler is programmed for time proportioned samples, not the flow proportioned samples that is required in the permit.

**Rule/Permit Reference:** Chapter 62-600.660(3)(b), F.A.C.- Grab samples shall be used to test CBOD<sub>5</sub>, TSS, and nutrients at facilities with a permitted capacity less than 100,000 gallons per day. Except as provided in paragraphs 62-600.660(3)(c) and (d), F.A.C., all other samples for CBOD5, TSS, and nutrients shall be flow proportioned, composite samples and compositing periods shall be 24, 16, or 8 hours based on the facility's staffing requirement. In no case shall the compositing period be less than 8 hours.

**Corrective Action:** Program the effluent composite sample to take flow proportioned samples. While the inspection was taking place, the sampler was reprogrammed to take flow proportioned samples. Verify that all aspects of the new program are correct.

**Deficiency:** The Hach Pocket Colorimeter II is not being checked with primary standards. This calibration/verification must be completed annually.
 **Rule/Permit Reference:** Chapter 62-160.210 (1) F.A.C. All persons that conduct or support field activities and field measurements shall follow the applicable procedures and requirements described the DEP SOP collections titled Standard Operating Procedures for Field Activities, DEP-SOP-001/01 FT 2000 3.2.3 - Instruments with Pre-Set or Factory Calibration: Instruments with a pre-set calibration do not require an initial calibration if the instrument calibration is verified with primary standards over the range of use (see 3.2.4 and 3.2.6 below for verification procedures). Verify with primary standards before first use and at least annually. Perform an initial calibration (3.2.2 above) when verification attempts are not successful.

**Corrective Action:** Perform annual calibration/verification of the Hach Pocket Colorimeter II. Forward the documentation of the corrective action to the Department.

**4.4** <u>**Deficiency:**</u> Secondary gel standards used to check the calibration of a hand-held Hach Pocket Colorimeter II are not being checked against primary standards. This check must be performed annually.

**Rule/Permit Reference:** Chapter 62-160.210 (1) F.A.C. All persons that conduct or support field activities and field measurements shall follow the applicable procedures and requirements described the DEP SOP collections titled Standard Operating Procedures for Field Activities, DEP-SOP-001/01 FT 2000 3.2.5 - Determining or Verifying the Values of Secondary Standards:

Use only those certified by the manufacturer for a specific instrument. The values of secondary standards may be dependent on the make and model of the instrument. **Perform all steps of the verification process on the same instrument model that will be used with the secondary standards**.

**Corrective Action:** Have the secondary standards verified against primary standards. Forward the documentation of the corrective action to the Department.

4.5 Deficiency: The pH meter was being calibrated/verified with expired standards. Rule/Permit Reference: Chapter 62-160.210 (1) F.A.C. All persons that conduct or support field activities and field measurements shall follow the applicable procedures and requirements described the DEP SOP collections titled Standard Operating Procedures for Field Activities, DEP-SOP-001/01 FT 1100 2.1.2 - On a weekly basis, check the calibration to ensure the % theoretical slope is greater than 90% (if applicable to your instrument type).

**Corrective Action:** Acquire buffers that are within the expiration dates. While conducting inspection the facility started using pH buffers that were within the expiration date of May 2021.

4.6 <u>Deficiency:</u> The thermometer in the influent compositor/effluent composite sampler refrigerator were not verified against the NIST-traceable thermometer. Rule/Permit Reference: Chapter 62-160.210 (1) F.A.C. All persons that conduct or support field activities and field measurements shall follow the applicable procedures and requirements described the DEP SOP collections titled Standard Operating Procedures for Field Activities, DEP-SOP-001/01 FT 1400 2.2.2 - Verify all thermistor (meter) devices and field thermometers against the NIST-traceable standard thermometer at several temperatures in the expected sample measurement range, using any correction factor indicated by the certificate supplied with the NIST-traceable thermometer.

**Corrective Action:** Obtain new or certify the existing thermometers against a NIST-traceable thermometer. Facility ordered new thermometers for the influent/effluent composite sampler refrigerator on October 22, 2019.

4.7 <u>Observation:</u> The influent composite sampler is a Hach AS950. Aliquots are set to pull 300mL, the sampler pulled 400mL. Sample tube was clean with no sagging. Additional Comments: The facility is to be doing flow proportioned sampling. The facility is doing time proportioned samples, currently. The Hach AS950 is a new sampler and the signal transmitter from the previous sampler does not fit the new sampler. The correct signal transmitter has been ordered. See deficiency 4.1.

**4.8** <u>**Observation:**</u> The effluent composite sampler is a Hach Sigma SD900. Aliquots are set to pull 200 mL, the sampler pulled 200mL. Sample tube was clean with no sagging.

Additional Comments: The composite sampler was set to time proportioned sampling. See deficiency 4.2.

- 4.9 <u>Observation:</u> The NIST-traceable thermometer in the influent composite sample was reading 3°C at the time of the inspection. The NIST-traceable thermometer in the effluent composite sampler was reading 5°C at the time of the inspection. Additional Comments: The NIST-traceable thermometers are replaced annually. See deficiency 4.6.
- 4.10 <u>Observation:</u> The in-line TSS meter is a Hach sc200, the meter was reading 3.54mg/L at the time of the inspection.
  Additional Comments: TSS is sampled after the filters and before chlorination. The facility is verifying the in-line TSS meter with a NELAC certified laboratory results.
- **4.11** <u>**Observation:**</u> The pH bench meter is an Oakton pH 300. The in-line pH meter is a Hach SC100, the meter was reading 7.45 s.u., at the time of the inspection. Verification/calibration of the in-line meter with the bench meter is done daily and written in a calibration log.

Additional Comments: The facility was using pH buffers 4.0, 7.0, and 10.0. See deficiency 4.5.

**4.12 Observation:** The total residual chlorine (TRC) field meter is Hach Pocket Colorimeter II, that was purchased January 23, 2018. The secondary gel standards were last verified on February 1, 2018. The in-line TRC meter is an ATI model Q46, with a reading of 3.94 ppm at the time of the inspection. Verification/calibration of the in-line meter with the bench meter is done daily and written in a calibration log. **Additional Comments:** The facility started using a new Hach DR300 while the inspection was taking place. **See deficiency 4.3 and 4.4.** 

# 5. • Records and Reports: Out-of-Compliance

| Documents/Records reviewed          | Time frame                         |
|-------------------------------------|------------------------------------|
| Discharge Monitoring Reports (DMRs) | From September 2018 to August 2019 |

- 5.1 <u>Deficiency</u>: In several months during the DMR review period, there were reporting errors on Part A of the DMR:
  - September 2018, CBOD (EFA-1) at R-001 and R-002, weekly average incorrect.
  - September 2018, TSS (EFA-1) at R-001, weekly average incorrect.
  - October 2018, CBOD (EFA-1) at R-001, weekly average incorrect.
  - October 2018, CBOD (EFA-1) at R-002, weekly average and maximum reported incorrectly.
  - November 2018, CBOD (EFA-1) at R-001and R-002, weekly average incorrect.
  - November 2018, TSS (EFA-1) at R-001, weekly average incorrect.
  - December 2018, CBOD (EFA-1) at R-001 and R-002, weekly average incorrect.
  - December 2018, TSS (EFA-1) at R-001, weekly average incorrect.

- January 2019, CBOD (EFA-1) at R-001 and R-002, weekly average incorrect.
- January 2019, TSS (EFA-1) at R-001, weekly average incorrect.
- February 2019, CBOD (EFA-1) at R-001 and R-002, weekly average incorrect.
- February 2019, TSS (EFA-1) at R-001, weekly average incorrect.
- March 2019, CBOD (EFA-1) at R-001and R-002, weekly average incorrect.
- March 2019, TSS (EFA-1) at R-001, weekly average incorrect.
- April 2019, CBOD (EFA-1) at R-001 and R-002, weekly average incorrect.
- April 2019, TSS (EFA-1) at R-001, weekly average incorrect.
- May 2019, CBOD (EFA-1) at R-001and R-002, weekly average incorrect.
- May 2019, TSS (EFA-1) at R-001, weekly average incorrect.
- June 2019, CBOD (EFA-1) at R-001and R-002, weekly average incorrect.
- June 2019, TSS (EFA-1) at R-001, weekly average incorrect.
- July 2019, CBOD (EFA-1) at R-001and R-002, weekly average incorrect.
- July 2019, TSS (EFA-1) at R-001, weekly average incorrect.
- August 2019, CBOD (EFA-1) at R-001 and R-002, weekly average incorrect.
- August 2019, TSS (EFA-1) at R-001, weekly average incorrect.
- August 2019, Fecal Coliform (EFA-1) at R-002, maximum incorrect.

**Rule/Permit Reference:** Chapter 62-600.680(1)(a) & (b) F.A.C., As required by the permit, the permittee shall submit monitoring results on the Discharge Monitoring Report, Form 62-620.910(10), F.A.C., in accordance with subsection 62-620.610 (18), F.A.C., as follows: (a) Discharge Monitoring Reports shall be mailed to the Department at the address specified in the permit or electronically submitted using the Departments Business Portal at http://www.fldepportal.com/go/. Reports shall be submitted in accordance with the frequencies specified on the Discharge Monitoring Report forms attached to the wastewater permit and be postmarked or entered electronically by the 28th day of the month following the month of operation; and, (b) Discharge Monitoring Reports of no discharge.

**Corrective Action:** Ensure that all reporting/calculations are done with in the requirements of the permit. **No further action is needed at this time.** 

**5.2** <u>**Deficiency:**</u> On the DMR for October 2018, TSS monthly average was calculated/reported incorrectly.

**Rule/Permit Reference:** Chapter 62-600.680(1)(a) & (b) F.A.C., As required by the permit, the permittee shall submit monitoring results on the Discharge Monitoring Report, Form 62-620.910(10), F.A.C., in accordance with subsection 62-620.610 (18), F.A.C., as follows: (a) Discharge Monitoring Reports shall be mailed to the Department at the address specified in the permit or electronically submitted using the Departments Business Portal at http://www.fldepportal.com/go/. Reports shall be submitted in accordance with the frequencies specified on the Discharge Monitoring Report forms attached to the wastewater permit and be postmarked or entered electronically by the 28th day of the month following the month of operation; and, (b) Discharge Monitoring Reports of no discharge.

**Corrective Action:** Verify that all calculations and reporting are done within the requirements of the permit. **No further action is needed at this time.** 

- **5.3** <u>**Deficiency:**</u> On several occasions during the DMR review, what was reported on Part B does not match what was reported on Part A:
  - January 2019, FLW-4 monthly average at R-001.
  - February 2018, TRC (EFA-1) minimum at R-001.
  - March 2019, FLW-4 monthly average at R-001.
  - May 2019, TSS (EFA-1) monthly average at R-001.
  - June 2019, FLW-2 monthly average at R-002.
  - July 2019, TSS (Grab at EFB-1) maximum at R-002.
  - August 2019, TSS (Grab at EFB-1) maximum at R-002.
  - August 2019, Fecal Coliform (EFA-1) maximum at R-002.

**Rule/Permit Reference:** Chapter 62-600.680(1)(a) & (b) F.A.C., As required by the permit, the permittee shall submit monitoring results on the Discharge Monitoring Report, Form 62-620.910(10), F.A.C., in accordance with subsection 62-620.610 (18), F.A.C., as follows: (a) Discharge Monitoring Reports shall be mailed to the Department at the address specified in the permit or electronically submitted using the Departments Business Portal at http://www.fldepportal.com/go/. Reports shall be submitted in accordance with the frequencies specified on the Discharge Monitoring Report forms attached to the wastewater permit and be postmarked or entered electronically by the 28th day of the month following the month of operation; and, (b) Discharge Monitoring Reports of no discharge.

**Corrective Action:** Verify that all calculations and reporting are done within the requirements of the permit. **No further action is needed at this time.** 

- 5.4 **Observation:** DMRs for the review period were submitted in a timely manner
- 5.5 **Observation:** A copy of the operations and maintenance manual was onsite.
- 5.6 Observation: A copy of the operating protocol was onsite. Reject points in the operating protocol for TSS and TRC match the SCADA system.
  Additional Comments: An updated copy of the operating protocol was received by the Department on September 12, 2018. The facility was given approval to remotely return to the reuse system from a reject event.
- 5.7 **Observation:** All maintenance is recorded in a maintenance book.
- **5.8** <u>**Observation:**</u> A bound, and numbered logbook was onsite. Operator staffing is in accordance with the permit.
  - Additional Comments: Samples are logged in the logbook.
- 5.9 **Observation:** Copies of operator certifications were on-site and current.
- 5.10 <u>Observation</u>: A current copy of the RPZ certifications was available.
  Additional Comments: The RPZs were certified by Utilities, Inc. of Florida on July 18, 2019.
- **5.11** <u>**Observation:**</u> The facility's Annual Reuse Report was received by the Department on December 21, 2018.
- **5.12** <u>**Observation:**</u> The pathogen monitoring report was performed on December 5, 2018. *Cryptosporidium* was below form limits, while *Giardia* sampled at 17.9/100L, which is above form limits.

Additional Comments: The facility resampled on March 6, 2019. *Cryptosporidium* was below form limits and *Giardia* sampled above form limits at 10.0/100L.

- **5.13** <u>**Observation:**</u> A certification stating there have been no new non-domestic wastewater dischargers have been added to the collection system was received on the December 2018 DMR.
- 6. Facility Site Review: In-Compliance
  - 6.1 **Observation:** The facility grounds were clean and well maintained.
  - 6.2 **Observation:** Slight odors were noted at the time of the inspection. Additional Comments: The odors did not extend past the boundaries of the plant.
  - **6.3** <u>**Observation:**</u> The facility grounds were properly secured with appropriate advisory signs.
  - **6.4** <u>**Observation:**</u> The reduced pressure zone backflow prevention devices were tested by a certified technician on July 18, 2019.
  - 6.5 <u>Observation:</u> There are emergency generators to run each the wastewater plant and the reuse portion of the plant. Additional Comments: The generators are exercised each week for one hour

Additional Comments: The generators are exercised each week, for one hour underload. The exercising of the generator is logged generator logbook.

- 6.6 **Observation:** The in-plant lift stations were functional with audio/visual alarms.
- 6.7 <u>Observation:</u> There is an odor control unit, made by Hibocs. It pulls odors from the static bar screen and splitter box.
- 6.8 Observation: Influent enters the plant through a static bar screen. Additional Comments: The bar screen is cleaned manually, at a minimum of once a day. There is a second static bar screen that is not in use and is not connected to the system.
- **6.9 Observation:** Screenings drop into a dumpster, that is emptied twice a week. The dumpster is located below the bar screen on a concrete pad.
- **6.10** Additional Comments: The drain in the dumpster area leads back to an in-plant lift station and takes influent back to the headworks.
- 6.11 <u>Observation:</u> The influent enters a splitter box after leaving the bar screen. Additional Comments: The splitter allows a portion of the influent to go directly into the plant and the other portion to enter the surge tank.
- 6.12 **Observation:** The plant has two identical trains, North and South.
- 6.13 **Observation:** The facility is equipped with a surge tank for each train.
- 6.14 <u>Observation:</u> Each train consists of four anoxic chambers. Additional comments: Three basins at the beginning of the treatment process and one after the last aeration chamber. These basins are used for nitrogen reduction.
- 6.15 <u>Observation:</u> Each train consists of four aeration basins. Additional comments: The contents of the chambers appeared adequately mixed. There was no excessive foaming observed.
- 6.16 <u>Observation:</u> After the fourth anoxic basin there is an air bay, at each train. Additional comments: The air bays are used for final nitrate reduction.
- **6.17 Observation:** The facility has three process blowers. These blowers run all portions of the plant.

Additional Comments: At the time of the inspection only one blower was in use. The other two blowers were down for repairs. When all three blowers are operational, the blowers are rotated weekly. 6.18 **Observation:** Each train consists of a clarifier.

Additional comments: Each clarifier appeared clear and had good settling. No popups were observed.

- 6.19 **Observation:** Each stilling well was free of excessive solids.
- 6.20 **Observation:** The skimmer arms were operating properly.
- 6.21 <u>Observation:</u> The weirs appeared level.
  - Additional Comments: There was no fouling of the weirs.
- **6.22 Observation:** There is a sodium hypochlorite tank at the bottom of the south plant. This tank gives a maintenance shot of chlorine to the effluent before it enters the filters.

Additional Comments: The chlorine shot helps control vectors and algae.

6.23 <u>Observation:</u> Each train had a Fontana micro screen filter. Both filters were in use at the time of the inspection.

Additional Comments: The filters are backwashed automatically, using a level system. Backwash water is returned to the head of the plant by an in-plant lift station.

- 6.24 <u>Observation:</u> There are two chlorine contact chambers (CCC).
  Additional Comments: only one CCC was online at the time of the inspection.
  Effluent appeared slightly cloudy at the time of the inspection. Sodium hypochlorite is added at the beginning of the process.
- 6.25 <u>Observation:</u> Disinfection is achieved with the use of sodium hypochlorite. Additional Comments: There are two sodium hypochlorite tanks at the facility. Only one is being used at this time. The tank is filled once a week.
- 6.26 <u>Observation:</u> There were two hypo chlorite pumps at the facility. Additional Comments: Only one pump was online at the time of the inspection. The pumps are rotated monthly.
- 6.27 <u>Observation:</u> Each train is equipped with one digester. Additional Comments: There appeared to be room for wasting in each digester. No vectors were present during the inspection.
- 6.28 **Observation:** There was a manual dewatering box at the facility.
- **6.29 Observation:** The facility has a SolarOrganite Biosolids processing system. **Additional Comments:** This system is not in use.
- **6.30 Observation:** The facility has 2 pumps to transfer water to the reuse water storage tank.

Additional Comments: There were two auto diversion valves at the facility. The valves are used to switch water between the storage tank and the RIBs.

**6.31** <u>**Observation:**</u> There were two pumps at the facility dedicated to pumping effluent to the reuse system.

# 7. Flow Measurement: In-Compliance

| Flow meter present and location as per permit? | Yes              |
|--|------------------|
| Easy access to flow meter?                     | Yes              |
| Date of last flow meter calibration            | January 30, 2019 |

7.1 <u>Observation:</u> A copy of the current flow meter calibration was on-site.
 Additional Comments: The flow meters were inspected by Paralee, Inc. Company.

# 8. • Operation and Maintenance: In-Compliance

| Facility being operated as per permit? | Yes |
|--|-----|
|--|-----|

**8.1 Observation:** The facility was operated and maintained in accordance with the description in the Permit.

# 9. • Effluent Quality: Out-of-Compliance

| DMRs review period | From September 2018 to August 2019 |
|--------------------|------------------------------------|
| Any exceedances?   | Yes                                |

**9.1** <u>**Deficiency:**</u> On the DMR for August 2019, Nitrate (EFA-1) at R-001 was reported at 13mg/L (Permit 12mg/L). An explanation for the exceedance was listed on Part A of the DMR.

**Rule/Permit Reference:** Permit Condition 1.A.1, during the period beginning on the issuance date and lasting through the expiration date of this permit, the permittee is authorized to discharge treated industrial wastewater to Land Application System R-002, a spray irrigation field. Such discharge shall be limited and monitored by the permittee as specified below and reported in accordance with Permit Condition I.B.3. Corrective Action: Take steps to remain in compliance with the Permit limit and report any Permit limit exceedances within 24 hours of discovery. No further action is needed at this time.

# 10. • Effluent Disposal: In-Compliance

| Facility discharging?                | Yes |
|--------------------------------------|-----|
| Discharge location(s) as per permit? | Yes |

- **10.1** <u>**Observation:**</u> The fence surrounding the effluent disposal site provided adequate access control.
- **10.2 Observation:** The RIBs had adequate freeboard
- **10.3 Observation:** RIBs are used for rejecting in cases of an issue, storage when the storage tank is full, and receiving effluent from another plant.
- **10.4** <u>**Observation:**</u> Appropriate reclaimed water signs were observed at Citrus highlands and Orange Tree communities.

# 11. Biosolids: In-Compliance

**11.1** <u>**Observation:**</u> According to onsite records, 16.01 tons of untreated biosolids were hauled to Shelley's Environmental Systems on October 15, 2019 for further treatment.

# 12. • Groundwater Quality: In-Compliance

| DMRs review period                                 | From July 2018 to June 2019 |
|--|-----------------------------|
| Any exceedances?                                   | See Observation             |
| All monitoring wells accessible, secured & locked? | See Observation             |

- **12.1** <u>**Observation:**</u> In all quarters of the review period the monitoring wells showed low pH. This is historically the findings with the facility.
- **12.2 Observation:** No monitoring wells were observed during the inspection.

#### 13. • SSO Survey: Out-of-Compliance

13.1 <u>Deficiency</u>: There was one SSO reported during the review period, throughout the Lake Groves WWTF collection/transmission system and at the facility.
 Rule/Permit Reference: Chapter 62.604.130 (1), F.A.C.: The following acts and the causing thereof are prohibited. (1) The release or disposal of excreta, sewage, or other wastewaters of residuals without providing proper treatment approved by the Department; construction or operation of a wastewater collection system not in compliance with this rule; or any act otherwise violating provisions of this rule or of any other rules of the Department.

**Corrective Action:** The SSO was reported to the Department as required and sufficient corrective actions were provided in a timely manner. **No further information is required at this time.** 

14. Other: Not Applicable



November 7, 2019

Mr. Sean Boyles Florida Department of Environmental Protection Central District 3319 Maguire Boulevard, Suite 232 Orlando, FL 32803

RE: Compliance Assistance Offer Lake Groves WWTF DW-Facility FLA010630 Lake County

Dear Mr. Boyles:

The Utility has received and reviewed the Department's letter dated October 29, 2019 regarding the outcome of the CEI inspection conducted on October 22, 2019 at the Lake Groves WWTF.

The Utility acknowledges the comments throughout the inspection report and is providing the following information to address specific corrective action items.

<u>Section 4.1</u> – The influent composite sampler transmitter was ordered the day of the inspection. Since that time the transmitter has been received and installed.

<u>Section 4.2</u> – All aspects of the new program for the effluent composite sampler were verified the day of the inspection and are correct.

<u>Section 4.3</u> – The Hach Pocket Colorimeter calibration verification was performed by the lab on 10/26/2019.

<u>Section 4.4</u> – The Secondary Gel Standards were verified against Primary Standards by the lab on 10/26/2019 and found to be acceptable.

<u>Section 4.6</u> – New thermometers for the influent and effluent composite samplers were ordered, received and placed in each unit on 10/24/2019.

We hope this information satisfies the Department's concerns. If additional information is required, please contact me at (321) 972-0360 or by email <u>bkgongre@uiwater.com</u>.

Sincerely, UTILITIES INC OF FLORIDA

Buyan K. Dongu

Bryan K. Gongre Regional Manager

Ec: Patrick Flynn, Vice President Seyd Matteson, Compliance & Safety Manager Domenic Gentilucci, Area Manager

a Utilities, Inc. company Utilities, Inc. of Florida

#### ATTACHMENT 3

#### LUSI WATER SERVICE AREA

#### DESCRIPTION

A TRACT OF LAND LYING IN TOWNSHIP 22 SOUTH, RANGE 25 EAST; TOWNSHIP 22 SOUTH, RANGE 26 EAST; TOWNSHIP 23 SOUTH, RANGE 26 EAST; TOWNSHIP 23 SOUTH, RANGE 26 EAST AND TOWNSHIP 24 SOUTH, RANGE 26 EAST, LAKE COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

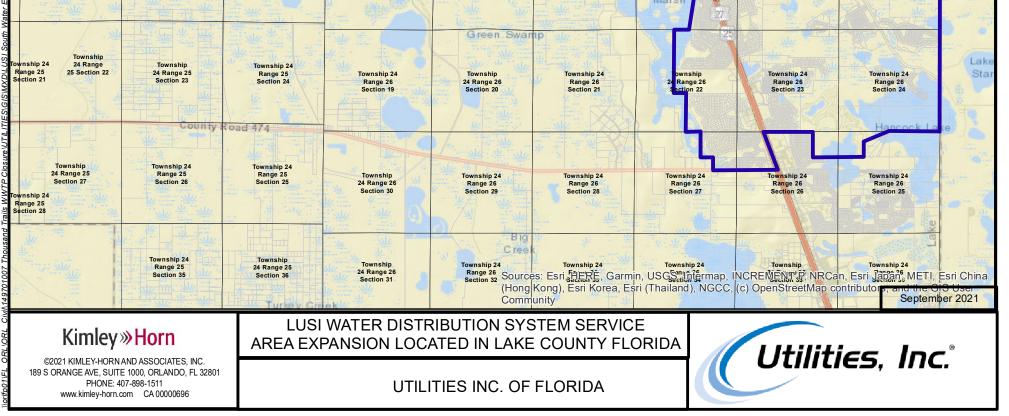
BEGINNING AT THE NORTHEAST CORNER OF SECTION 25, TOWNSHIP 23 SOUTH. RANGE 26 EAST, RUN SOUTH ALONG THE EAST LINES OF SAID SECTION 25 AND SECTION 36, TOWNSHIP 23 SOUTH, RANGE 26 EAST, AND SECTIONS 01, 12, 13, AND 24, TOWNSHIP 24 SOUTH, RANGE 26 EAST, TO THE SOUTHEAST CORNER OF SAID SECTION 24; THENCE DEPARTING SAID EAST LINE, RUN WEST ALONG THE SOUTH LINE OF SAID SECTION 24 A DISTANCE OF 2628.51 FEET TO THE SOUTH 1/4 CORNER OF SAID SECTION 24; THENCE DEPARTING SAID SOUTH LINE, RUN S67°25'14"W, A DISTANCE OF 1434.86 FEET TO A POINT ON THE EAST LINE OF THE NORTHWEST 1/4 OF THE NORTHWEST 1/4 OF SECTION 25, TOWNSHIP 24 SOUTH, RANGE 26 EAST; THENCE RUN S00° 19'12"W ALONG SAID EAST LINE A DISTANCE OF 798.51 FEET TO THE SOUTHEAST CORNER OF THE NORTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 25; THENCE DEPARTING SAID EAST LINE, RUN WEST ALONG THE SOUTH LINE OF THE NORTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 25 AND THE SOUTH LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 26, TOWNSHIP 24 SOUTH, RANGE 26 EAST, TO THE SOUTHWEST CORNER OF NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 26; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 26 TO THE NORTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 26; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE NORTH LINE OF SAID SECTION 26 TO A POINT ON THE CENTERLINE OF U.S. HIGHWAY #27: THENCE DEPARTING SAID NORTH LINE, RUN SOUTHEAST ALONG SAID CENTERLINE TO A POINT ON THE SOUTH LINE OF THE NORTH 1/2 OF THE SOUTH 1/2 OF THE NORTHWEST 1/4 OF SAID SECTION 26; THENCE DEPARTING SAID CENTERLINE, RUN WEST ALONG SAID SOUTH LINE AND ALONG THE SOUTH LINE OF THE NORTH 1/2 OF THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 27, TOWNSHIP 24 SOUTH, RANGE 26 EAST, TO THE SOUTHWEST CORNER OF THE NORTH 1/2 OF THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27: THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINE OF THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27, TO THE SOUTHEAST CORNER OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINE OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27 TO THE SOUTHWEST CORNER OF THE EAST 1/2 OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27: THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINE OF THE EAST 1/2 OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27 TO THE SOUTHEAST CORNER OF THE

SOUTHWEST 1/4 OF THE SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 22, TOWNSHIP 24 SOUTH, RANGE 26 EAST; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINE OF SAID SECTION 22 TO THE SOUTHWEST CORNER OF THE SOUTHEAST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINE OF THE SOUTHEAST 1/4 OF SAID SECTION 22 TO THE SOUTHEAST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SAID SECTION 22 TO THE SOUTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG WEST LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SAID SECTION 22 AND THE WEST LINE OF THE EAST 1/2 OF THE EAST 1/2 OF THE NORTHWEST 1/4 OF SAID SECTION 22 TO THE NORTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID WEST LINE, RUN EAST ALONG THE NORTH LINE OF SAID SECTION 22 A DISTANCE OF 779.42; THENCE DEPARTING SAID NORTH LINE, RUN N08°28'18"E, A DISTANCE OF 1963.81 FEET; THENCE RUN N19°16'20"W, A DISTANCE OF 737.22 FEET TO A POINT ON THE SOUTH LINE OF THE NORTHEAST 1/4 OF SECTION 15, TOWNSHIP 24 SOUTH, RANGE 26 EAST; THENCE RUN WEST ALONG SAID SOUTH LINE A DISTANCE OF 2726.50 FEET TO THE WEST 1/4 CORNER OF SAID SECTION 15; THENCE DEPARTING SAID SOUTH LINE, RUN N00°46'09"W, A DISTANCE OF 9.63 FEET; THENCE RUN N89°15'03"E, A DISTANCE OF 55.95 FEET; THENCE RUN S89°50'27"E, A DISTANCE OF 59.15 FEET; THENCE RUN N89°59'24"E, A DISTANCE OF 49.27 FEET; THENCE RUN S88°13'07"E, A DISTANCE OF 59.03 FEET; THENCE RUN S88°28'10"E, A DISTANCE OF 54.99 FEET; THENCE RUN N89°37'10"E, A DISTANCE OF 45.73 FEET; THENCE RUN N89°50'30"E, A DISTANCE OF 39.00 FEET; THENCE RUN N88°58'32"E, A DISTANCE OF 48.05 FEET; THENCE RUN N86°38'09"E, A DISTANCE OF 53.58 FEET; THENCE RUN N88°03'18"E, A DISTANCE OF 65.11 FEET; THENCE RUN N83°28'02"E, A DISTANCE OF 46.10 FEET; THENCE RUN N74°43'38"E, A DISTANCE OF 31.36 FEET; THENCE RUN N46°59'45"E, A DISTANCE OF 27.72 FEET; THENCE RUN S72°17'47"E, A DISTANCE OF 24.18 FEET; THENCE RUN N72°44'02"E, A DISTANCE OF 52.35 FEET; THENCE RUN N75°16'54"E, A DISTANCE OF 44.62 FEET; THENCE RUN N76°44'19"E, A DISTANCE OF 45.16 FEET; THENCE RUN N66°06'32"E, A DISTANCE OF 42.91 FEET: THENCE RUN N73°23'27"E. A DISTANCE OF 36.05 FEET: THENCE RUN N75°47'41"E, A DISTANCE OF 27.80 FEET; THENCE RUN N64°42'31"W, A DISTANCE OF 26.33 FEET; THENCE RUN N78°02'12"W, A DISTANCE OF 15.09 FEET; THENCE RUN N46°55'48"W, A DISTANCE OF 28.01 FEET; THENCE RUN N04°29'55"W, A DISTANCE OF 31.60 FEET; THENCE RUN N18°47'22"W, A DISTANCE OF 28.33 FEET; THENCE RUN N33°08'03"W, A DISTANCE OF 29.15 FEET; THENCE RUN N06°38'49"E, A DISTANCE OF 49.75 FEET; THENCE RUN N58°00'58"E, A DISTANCE OF 35.28 FEET; THENCE RUN N50°52'52"E, A DISTANCE OF 38.63 FEET; THENCE RUN N21°54'59"E, A DISTANCE OF 23.67 FEET; THENCE RUN N31°27'02"E, A DISTANCE OF 34.00 FEET; THENCE RUN N34°15'07"W, A DISTANCE OF 18.32 FEET; THENCE RUN N34°43'58"W, A DISTANCE OF 9.02 FEET; THENCE RUN N14°23'54"E, A DISTANCE OF 15.71 FEET; THENCE RUN N38°55'44"E, A DISTANCE OF 9.23 FEET; THENCE RUN N53°12'28"E, A DISTANCE OF 26.43 FEET; THENCE RUN N84°23'47"E, A DISTANCE OF 28.35 FEET; THENCE RUN N35°37'38"E, A DISTANCE OF 15.47 FEET; THENCE RUN N10°48'04"E, A DISTANCE OF 29.24 FEET; THENCE RUN N34°26'45"E, A DISTANCE OF 33.20 FEET; THENCE RUN N31°36'42"E, A DISTANCE OF 56.27 FEET; THENCE RUN N32°43'08"E, A DISTANCE OF 30.08 FEET; THENCE RUN N14°03'31"E, A DISTANCE OF 31.26 FEET; THENCE RUN N19°26'59"E, A DISTANCE OF 19.22 FEET; THENCE RUN N42°30'08"E, A DISTANCE OF 39.40 FEET; THENCE RUN N02°49'13"E, A DISTANCE OF 26.89 FEET; THENCE RUN N07°56'28"E, A DISTANCE OF 28.98 FEET; THENCE RUN N03°03'27"E, A DISTANCE OF 32.47 FEET; THENCE RUN N04°16'12"E, A DISTANCE OF 27.51 FEET; THENCE RUN N10°42'32"E, A DISTANCE OF 32.00 FEET; THENCE RUN N07°53'16"E, A DISTANCE OF 17.83 FEET; THENCE RUN N24°01'02"E, A DISTANCE OF 25.64 FEET; THENCE RUN N34°14'07"E, A DISTANCE OF 21.65 FEET; THENCE RUN N24°01'25"E, A DISTANCE OF 19.53 FEET; THENCE RUN N02°17'14"E, A DISTANCE OF 41.24 FEET; THENCE RUN N02°29'16"E, A DISTANCE OF 82.41 FEET; THENCE RUN N07°01'02"W, A DISTANCE OF 52.74 FEET; THENCE RUN N03°41'04"W, A DISTANCE OF 104.21 FEET; THENCE RUN N02°04'36"W, A DISTANCE OF 100.65 FEET; THENCE RUN N35°26'38"W, A DISTANCE OF 40.47 FEET; THENCE RUN N13°05'18"E, A DISTANCE OF 36.40 FEET; THENCE RUN N12°26'02"W, A DISTANCE OF 34.81 FEET; THENCE RUN N62°02'57"W, A DISTANCE OF 35.93 FEET; THENCE RUN N21°32'23"E, A DISTANCE OF 19.38 FEET; THENCE RUN S82°36'53"E, A DISTANCE OF 31.38 FEET; THENCE RUN N10°58'40"E, A DISTANCE OF 49.70 FEET; THENCE RUN N50°11'59"W, A DISTANCE OF 38.36 FEET; THENCE RUN N45°50'02"E, A DISTANCE OF 62.22 FEET; THENCE RUN N00°23'31"E, A DISTANCE OF 66.17 FEET; THENCE RUN N02°42'17"W, A DISTANCE OF 70.17 FEET; THENCE RUN N04°34'58"E, A DISTANCE OF 25.79 FEET; THENCE RUN N13°34'00"W, A DISTANCE OF 103.36 FEET; THENCE RUN N07°35'40"W, A DISTANCE OF 47.92 FEET; HENCE RUN N08°15'44"W, A DISTANCE OF 82.22 FEET; THENCE RUN N12°24'44"W, A DISTANCE OF 108.97 FEET; THENCE RUN N09°51'24"W, A DISTANCE OF 112.56 FEET; THENCE RUN N12°36'41"W, A DISTANCE OF 113.42 FEET; THENCE RUN N01°25'52"E, A DISTANCE OF 91.38 FEET; THENCE RUN N03°08'19"W, A DISTANCE OF 126.70 FEET; THENCE RUN N54°37'53"E, A DISTANCE OF 53.45 FEET; THENCE RUN N33°44'02"W, A DISTANCE OF 114.64 FEET; THENCE RUN N23°24'17"W, A DISTANCE OF 76.28 FEET TO A POINT ON THE SOUTH LINE OF SECTION 10, TOWNSHIP 24 SOUTH. RANGE 26 EAST: THENCE DEPARTING SAID WESTERLY LINE. RUN WEST LONG THE SOUTH LINES OF SAID SECTION 10 AND OF SECTIONS 09, AND 08, TOWNSHIP 24 SOUTH, RANGE 26 EAST, A DISTANCE OF 11555.13 FEET TO THE SOUTHWEST CORNER OF SAID SECTION 08; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINES OF SAID SECTION 08 AND OF SECTION 5, TOWNSHIP 24 SOUTH, RANGE 26 EAST, TO THE NORTHWEST CORNER OF SAID SECTION 05; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINE OF SECTION 31, TOWNSHIP 23 SOUTH, RANGE 26 EAST, TO THE SOUTHWEST CORNER OF SAID SECTION 31; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINES OF SAID SECTION 31 AND OF SECTION 30, TOWNSHIP 23 SOUTH, RANGE 26 EAST, TO THE NORTHWEST CORNER OF SAID SECTION 30; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINES OF SECTIONS 24 AND 23, TOWNSHIP 23 SOUTH, RANGE 25 EAST, TO

THE SOUTHWEST CORNER OF SAID SECTION 23; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINES OF SAID SECTION 23, SECTIONS 14, 11, AND 02, TOWNSHIP 23 SOUTH, RANGE 25 EAST, AND SECTION 35, TOWNSHIP 22 SOUTH, RANGE 25 EAST, TO THE NORTHWEST CORNER OF SAID SECTION 35; THENCE DEPARTING SAID WEST LINE, RUN EAST ALONG THE NORTH LINE OF SAID SECTION 35 TO THE NORTHEAST CORNER OF THE NORTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 35; THENCE DEPARTING SAID NORTH LINE, RUN NORTH ALONG THE WEST LINE OF THE SOUTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 26, TOWNSHIP 22 SOUTH, RANGE 25 EAST, A DISTANCE OF 744.69 FEET TO A POINT ON THE SOUTH SHORE OF LAKE MINNEHAHA; THENCE DEPARTING SAID WEST LINE, RUN ALONG SAID SOUTH SHORE THE FOLLOWING FORTY-EIGHT (48) COURSES: (1) RUN S67°24'38"E, A DISTANCE OF 544.07 FEET; (2) THENCE RUN S71°26'23"E, A DISTANCE OF 476.50 FEET; (3) THENCE RUN S01°04'09"W, A DISTANCE OF 285.84 FEET; (4) THENCE RUN S31°01'06"E, A DISTANCE OF 442.55 FEET; (5) THENCE RUN S06°13'07"W, A DISTANCE OF 861.68 FEET; (6) THENCE RUN S31°39'14"W, A DISTANCE OF 289.52 FEET; (7) THENCE RUN S08°00'49"E, A DISTANCE OF 1,270.70 FEET; (8) THENCE RUN N89°33'53"W, A DISTANCE OF 373.48 FEET; (9) THENCE RUN S05°04'31"W, A DISTANCE OF 207.96 FEET; (10) THENCE RUN S58°54'10"E, A DISTANCE OF 436.81 FEET; (11) THENCE RUN S08°47'43"E, A DISTANCE OF 319.88 FEET; (12) THENCE RUN S15°21'43"E, A DISTANCE OF 305.52 FEET; (13) THENCE RUN S19°53'06"E, A DISTANCE OF 350.44 FEET; (14) THENCE RUN S34°48'18"E, A DISTANCE OF 331.34 FEET; (15) THENCE RUN S32°58'53"E, A DISTANCE OF 907.87 FEET; (16) THENCE RUN S40°08'28"E, A DISTANCE OF 804.18 FEET; (17) THENCE RUN S50°51'13"E, A DISTANCE OF 1,572.96 FEET; (18) THENCE RUN S47°27'29"E, A DISTANCE OF 592.54 FEET; (19) THENCE RUN S59°27'30"E, A DISTANCE OF 339.61 FEET; (20) THENCE RUN N85°00'35"E, A DISTANCE OF 808.90 FEET; (21) THENCE RUN N62°48'09"E, A DISTANCE OF 592.54 FEET; (22) THENCE RUN N38°46'54"E, A DISTANCE OF 575.41 FEET; (23) THENCE RUN \$51°10'05"E, A DISTANCE OF 220.00 FEET; (24) THENCE RUN \$89°04'54"E, A DISTANCE OF 208.45 FEET; (25) THENCE RUN N00°14'28"W, A DISTANCE OF 316.54 FEET; (26) THENCE RUN N26°12'56"W, A DISTANCE OF 427.83 FEET; (27) THENCE RUN N14°36'39"E, A DISTANCE OF 231.27 FEET; (28) THENCE RUN N84°14'42"E, A DISTANCE OF 112.27 FEET; (29) THENCE RUN N63°14'17"E, A DISTANCE OF 1,102.93 FEET; (30) THENCE RUN N78°07'44"E, A DISTANCE OF 864.97 FEET; (31) THENCE RUN N88°39'53"E, A DISTANCE OF 102.00 FEET; (32) THENCE RUN S80°10'06"E, A DISTANCE OF 369.93 FEET: (33) THENCE RUN N56°20'03"E. A DISTANCE OF 174.64 FEET; (34) THENCE RUN S83°02'57"E, A DISTANCE OF 296.01 FEET; (35) THENCE RUN S74°04'02"E, A DISTANCE OF 226.28 FEET; (36) THENCE RUN S45°13'59"E, A DISTANCE OF 70.64 FEET; (37) THENCE RUN S28°03'26"W, A DISTANCE OF 109.49 FEET; (38) THENCE RUN S15°43'49"E, A DISTANCE OF 129.21 FEET; (39) THENCE RUN S58°27'50"E, A DISTANCE OF 203.38 FEET; (40) THENCE RUN S85°12'44"E, A DISTANCE OF 324.98 FEET; (41) THENCE RUN N78°30'56"E, A DISTANCE OF 243.88 FEET; (42) THENCE RUN S67°11'20"E, A DISTANCE OF 202.31 FEET; (43) THENCE RUN N63°50'44"E. A DISTANCE OF 946.60 FEET: (44) THENCE RUN N47°39'47"E. A DISTANCE OF 1,402.54 FEET; (45) THENCE RUN N46°52'59"E, A DISTANCE OF 711.73 FEET; (46) THENCE RUN N29°43'45"E, A DISTANCE OF 937.03 FEET; (47) THENCE

RUN N87°20'31"W, A DISTANCE OF 132.89 FEET; (48) THENCE RUN N01°56'46"E, A DISTANCE OF 2,561.91 FEET TO A POINT ON THE NORTH LINE OF SECTION 31, TOWNSHIP 22 SOUTH, RANGE 26 EAST; THENCE DEPARTING SAID SOUTH SHORE, RUN EAST ALONG SAID NORTH LINE AND THE NORTH LINE OF SECTION 32, TOWNSHIP 22 SOUTH, RANGE 26 EAST, A DISTANCE OF 2325.63 FEET TO A POINT ON THE CENTERLINE OF U.S. HIGHWAY #27; THENCE DEPARTING SAID NORTH LINE, RUN SOUTHEASTERLY ALONG SAID CENTERLINE TO A POINT ON THE SOUTH LINE OF SECTION 21, TOWNSHIP 23 SOUTH, RANGE 26 EAST; THENCE DEPARTING SAID CENTERLINE, RUN EAST ALONG SAID SOUTH LINE TO THE SOUTHEAST CORNER OF SAID SECTION 21; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE EAST LINE OF SAID SECTION 21 TO THE NORTHEAST CORNER OF THE SOUTHEAST 1/4 OF SAID SECTION 21; THENCE DEPARTING SAID EAST LINE, RUN WEST ALONG THE SOUTH LINE OF THE NORTH 1/2 OF SAID SECTION 21, TO A POINT ON THE CENTERLINE OF U.S. HIGHWAY #27; THENCE DEPARTING SAID SOUTH LINE, RUN NORTHEAST ALONG SAID CENTERLINE TO A POINT ON THE NORTH LINE OF SAID SECTION 21; THENCE DEPARTING SAID CENTERLINE, RUN EAST ALONG SAID NORTH LINE AND ALONG THE NORTH LINE OF SECTION 22, TOWNSHIP 23 SOUTH, RANGE 26 EAST, TO THE NORTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID NORTH LINE, RUN SOUTH ALONG THE WEST LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 22, TO THE SOUTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID WEST LINE, RUN EAST ALONG THE SOUTH LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 22 AND THE NORTH LINE OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SECTION 23, TOWNSHIP 23 SOUTH, RANGE 26 EAST, TO THE NORTHEAST CORNER OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 23; THENCE DEPARTING SAID NORTH LINE, RUN SOUTH ALONG THE EAST LINE OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 23, TO THE SOUTHEAST CORNER OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 23: THENCE DEPARTING SAID EAST LINE. RUN WEST ALONG THE SOUTH LINE OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 23, TO THE SOUTHWEST CORNER OF THE NORTHWEST 1/4 OF SAID SECTION 23; THENCE DEPARTING SAID SOUTH LINE, RUN SOUTH ALONG THE EAST LINE OF SECTION 22, TOWNSHIP 23 SOUTH, RANGE 26 EAST, TO THE SOUTHEAST CORNER OF SAID SECTION 22: THENCE DEPARTING SAID EAST LINE. RUN EAST ALONG THE NORTH LINES OF SECTIONS 26 AND 25, TOWNSHIP 23 SOUTH, RANGE 26 EAST TO THE NORTHEAST CORNER OF SAID SECTION 25 AND THE POINT OF BEGINNING.

| S197   |                                       | A COMPANY AND A COMPANY                               |  |                                       | 1000 miles   |  |  |   |  |                 |  |
|--|---------------------------------------|---|--|---------------------------------------|--|--|--|---|--|-----------------|--|
| Township 22<br>Range 25<br>Section 21  | Township 22<br>Range 25<br>Section 22 | Township 22<br>Range 25<br>Section 23                 | Township<br>22 Range 25<br>Section 24                      | Township<br>22 Range 26<br>Section 19 | Township<br>22 Range 26<br>Section 20  | Township 22<br>Range 26<br>Section 21                              | Township<br>22 Range 26<br>Section 22                  |   |  |                 |  |
| Township<br>22 Range 25<br>Section 28  | Township<br>22 Range 25<br>Section 27 | Township 22<br>Range 25<br>Section 26                 | Township 22<br>Range 25<br>Section 25                      | Township 22<br>Range 26<br>Section 30 | Township 22<br>Range 26<br>Section 29  | E Highway<br>Township 22<br>Range 26<br>Section 28                 | 11 50<br>Township 22<br>Range 26<br>Section 27         |   | 500 5,000<br>Feet<br>= 5,000 feet                              |                 |  |
| Township 22<br>Range 25<br>Section 33  | Township 22<br>Range 25<br>Section 34 | Township<br>22 painge 25<br>Solbion 35                | Lake<br>Minnehaha<br>Township 22<br>Range 25<br>Section 36 | Township 22<br>Range 26<br>Section 31 | Township 22<br>Ringe 26<br>Section 32  | Township 22<br>Range 26<br>Section 33                              | Township 22<br>Range 26<br>Section 34                  | S   | <b>nd</b><br>Water Service Area<br>Section Grid<br>Tax Parcels | ohns Lake       |  |
| Township 23<br>Range 25<br>Section 4   |                                       | Township 23<br>Range 25<br>Section 2                  | Township 23<br>Range 25<br>Section 1                       | Township<br>23 Range 26<br>Section 6  | Township 23<br>Recreating 26<br>Section 5  | Township<br>23 Range 26<br>Section 4<br>Kings Ricton<br>Golf Clubs | Township 23<br>Range 26<br>Section 3                   | Township 23<br>Range 26<br>Section 2                | Township 23<br>Range 26<br>Section 1                           | Marsh           |  |
| Township<br>23 Range 25<br>Section 9   | Township 23<br>Range 25<br>Section 10 | Township<br>23 Range 25: a m<br>Section 11            | Township 23<br>Range 25<br>Section 12                      | Township 23<br>Range 26<br>Section 7  | Township<br>23 Range 26<br>Section 8   | Township<br>23 Range 26<br>Section 9                               | Township 23<br>Range 26 Cond M<br>Section 10           | Township 23<br>Range 26<br>Section 11               | Township 23<br>Range 26<br>Section 12                          |                 |  |
| Township 23<br>Range 25<br>Section 16  | Township 23<br>Range 25<br>Section 15 | Township 23<br>Range 25<br>Section 14                 | Township 23<br>Range 25<br>Section 13                      | Township<br>23 Range 26<br>Section 18 | Township<br>23 Range 26<br>Section 17  | Township<br>23 Range 26<br>Section 16                              | Township<br>23 Range 26<br>Section 15                  | Township 23<br>Range 26<br>Section 14               | Township 23<br>Range 26<br>Section 13                          | Orange          |  |
| Township<br>23 Range 25<br>Section 21  | Township 23<br>Range 25<br>Section 22 | Township 23<br>Range 25<br>Section 23                 | Lake<br>Ne III Township 23<br>Range 25<br>Section 24       | Township 23<br>Range 26<br>Section 19 | Township 23<br>Range 26<br>Section 20  | Toynship 23<br>Runge 29<br>Section 21                              | Township 23<br>Range 26<br>Section 22                  | Township<br>23 Range 26<br>Section 23               | Township 23<br>Range 26<br>Section 24                          |                 |  |
| Township<br>23 Range 25<br>Section 28  | Township 23<br>Range 25<br>Section 27 | Township 23<br>Range 25<br>Section 26                 | Township 23<br>Range 25<br>Section 25                      | Township<br>23 Range 26<br>Section 30 | Township<br>23 Range 26<br>Section 29  | Township<br>23 Range 26<br>Section 28                              | Township<br>23 Range 26<br>Section 27                  | Township<br>23 Range 26<br>Section 26               | Township 23<br>Range 26<br>Section 25                          |                 |  |
| Township<br>23 Range 25<br>Section 33  | Township 23<br>Range 25<br>Section 34 | Township 23<br>Range 25<br>Section 35                 | Township 23<br>Range 25<br>Section 36                      | Township 23<br>Range 26<br>Section 31 | Lake Louisa<br>State Park<br>Township 23<br>Range 26<br>Section 32<br>Dixie Lake | Township 23<br>Range 26<br>Section 33                              | Township 23<br>Range 26<br>Section 34<br>Adain<br>Lake | Township<br>23 Range 26<br>Section 35               | Township 23<br>Range 26<br>Section 36                          | Lake<br>leedham |  |
| 2 Township<br>24 Reange 25<br>25 Section 4   | Township<br>24 Range 25<br>Section 3  | Township 24<br>Range 25<br>Section 2                  | Township 24<br>Range 25<br>Section 1                       | Township<br>24 Range 26<br>Section 6  | Township 24<br>Range 26<br>Section 5   | Township<br>24 Range 26<br>Section 4                               | U.S. 27<br>Township<br>24 Range 26<br>Section 3        | Sawgrass La<br>Township 24<br>Range 26<br>Section 2 | Township<br>24 Range 26<br>Section 1                           |                 |  |
| Township<br>24 Range 25<br>25 Section 4<br>70wnship<br>24 Range 25<br>25 Section 9 | Township<br>24 Range<br>25 Section 10 | Township 24<br>Range 25<br>Section 11                 | Township<br>24 Range 25<br>Section 12                      | Township<br>24 Range 26<br>Section 7  | Township<br>24 Range 26<br>Section 8   | Township 24<br>Range 26<br>Section 9                               | Township 24<br>Range 26<br>Section 10                  | Township 24<br>Range 26<br>Section 11               | Township 24<br>Range 26<br>Section 12                          |                 |  |
| Township<br>24 Range 25<br>Section 16  | Township 24<br>Range 25<br>Section 15 | Township 24<br>Range 25<br>Section 14<br>Little Creek | Township 24<br>Range 25<br>Section 13                      | Township 24<br>Range 26<br>Section 18 | Township<br>24 Range 26<br>Section 17  | Township 24<br>Range 26<br>Section 16                              | Township 24<br>Borsection 15<br>Marsh                  | Township 24<br>Range 26<br>Section 14               | Township 24<br>Range 26<br>Section 13                          | Orange          |  |



#### LUSI SOUTH SANITARY SEWER SERVICE AREA

#### DESCRIPTION

A TRACT OF LAND LYING IN TOWNSHIP 23 SOUTH, RANGE 26 EAST AND TOWNSHIP 24 SOUTH, RANGE 26 EAST, LAKE COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF SECTION 25, TOWNSHIP 23 SOUTH, RANGE 26 EAST, RUN SOUTH ALONG THE EAST LINES OF SAID SECTION 25 AND SECTION 36, TOWNSHIP 23 SOUTH, RANGE 26 EAST, AND SECTIONS 01, 12, 13, AND 24, TOWNSHIP 24 SOUTH, RANGE 26 EAST, TO THE SOUTHEAST CORNER OF SAID SECTION 24; THENCE DEPARTING SAID EAST LINE, RUN WEST ALONG THE SOUTH LINE OF SAID SECTION 24 A DISTANCE OF 2628.51 FEET TO THE SOUTH 1/4 CORNER OF SAID SECTION 24; THENCE DEPARTING SAID SOUTH LINE, RUN S67°25'14"W, A DISTANCE OF 1434.86 FEET TO A POINT ON THE EAST LINE OF THE NORTHWEST 1/4 OF THE NORTHWEST 1/4 OF SECTION 25, TOWNSHIP 24 SOUTH, RANGE 26 EAST; THENCE RUN S00° 19'12"W ALONG SAID EAST LINE A DISTANCE OF 798.51 FEET TO THE SOUTHEAST CORNER OF THE NORTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 25; THENCE DEPARTING SAID EAST LINE, RUN WEST ALONG THE SOUTH LINE OF THE NORTHWEST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 25 AND THE SOUTH LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 26, TOWNSHIP 24 SOUTH, RANGE 26 EAST, TO THE SOUTHWEST CORNER OF NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 26; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 26 TO THE NORTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 26: THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE NORTH LINE OF SAID SECTION 26 TO A POINT ON THE CENTERLINE OF U.S. HIGHWAY #27; THENCE DEPARTING SAID NORTH LINE, RUN SOUTHEAST ALONG SAID CENTERLINE TO A POINT ON THE SOUTH LINE OF THE NORTH 1/2 OF NORTHWEST 1/4 OF SAID SECTION 26; THENCE DEPARTING SAID CENTERLINE, RUN WEST ALONG SAID SOUTH LINE AND ALONG THE SOUTH LINE OF THE NORTH 1/2 OF THE NORTHEAST 1/4 OF SECTION 27, TOWNSHIP 24 SOUTH, RANGE 26 EAST, TO THE SOUTHEAST CORNER OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINE OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27 TO THE SOUTHWEST CORNER OF THE EAST 1/2 OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINE OF THE EAST 1/2 OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 27 TO THE SOUTHEAST CORNER OF THE SOUTHWEST 1/4 OF THE SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 22, TOWNSHIP 24 SOUTH, RANGE 26 EAST; THENCE

DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINE OF SAID SECTION 22 TO THE SOUTHWEST CORNER OF THE SOUTHEAST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINE OF THE SOUTHEAST 1/4 OF SAID SECTION 22 TO THE SOUTHEAST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SAID SECTION 22 TO THE SOUTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG WEST LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SAID SECTION 22 AND THE WEST LINE OF THE EAST 1/2 OF THE EAST 1/2 OF THE NORTHWEST 1/4 OF SAID SECTION 22 TO THE NORTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SAID SECTION 22; THENCE DEPARTING SAID WEST LINE, RUN EAST ALONG THE NORTH LINE OF SAID SECTION 22 A DISTANCE OF 779.42; THENCE DEPARTING SAID NORTH LINE, RUN N08°28'18"E, A DISTANCE OF 1963.81 FEET; THENCE RUN N19°16'20"W, A DISTANCE OF 737.22 FEET TO A POINT ON THE SOUTH LINE OF THE NORTHEAST 1/4 OF SECTION 15, TOWNSHIP 24 SOUTH, RANGE 26 EAST; THENCE RUN WEST ALONG SAID SOUTH LINE A DISTANCE OF 2726.50 FEET TO THE WEST 1/4 CORNER OF SAID SECTION 15; THENCE DEPARTING SAID SOUTH LINE, RUN N00°46'09"W, A DISTANCE OF 9.63 FEET; THENCE RUN N89°15'03"E, A DISTANCE OF 55.95 FEET; THENCE RUN S89°50'27"E, A DISTANCE OF 59.15 FEET; THENCE RUN N89°59'24"E, A DISTANCE OF 49.27 FEET; THENCE RUN S88°13'07"E, A DISTANCE OF 59.03 FEET; THENCE RUN S88°28'10"E, A DISTANCE OF 54.99 FEET; THENCE RUN N89°37'10"E, A DISTANCE OF 45.73 FEET; THENCE RUN N89°50'30"E, A DISTANCE OF 39.00 FEET; THENCE RUN N88°58'32"E, A DISTANCE OF 48.05 FEET; THENCE RUN N86°38'09"E, A DISTANCE OF 53.58 FEET; THENCE RUN N88°03'18"E, A DISTANCE OF 65.11 FEET; THENCE RUN N83°28'02"E, A DISTANCE OF 46.10 FEET; THENCE RUN N74°43'38"E, A DISTANCE OF 31.36 FEET; THENCE RUN N46°59'45"E, A DISTANCE OF 27.72 FEET; THENCE RUN S72°17'47"E, A DISTANCE OF 24.18 FEET; THENCE RUN N72°44'02"E, A DISTANCE OF 52.35 FEET; THENCE RUN N75°16'54"E, A DISTANCE OF 44.62 FEET; THENCE RUN N76°44'19"E, A DISTANCE OF 45.16 FEET; THENCE RUN N66°06'32"E, A DISTANCE OF 42.91 FEET; THENCE RUN N73°23'27"E, A DISTANCE OF 36.05 FEET; THENCE RUN N75°47'41"E, A DISTANCE OF 27.80 FEET; THENCE RUN N64°42'31"W, A DISTANCE OF 26.33 FEET; THENCE RUN N78°02'12"W, A DISTANCE OF 15.09 FEET; THENCE RUN N46°55'48"W, A DISTANCE OF 28.01 FEET; THENCE RUN N04°29'55"W, A DISTANCE OF 31.60 FEET; THENCE RUN N18°47'22"W, A DISTANCE OF 28.33 FEET; THENCE RUN N33°08'03"W, A DISTANCE OF 29.15 FEET; THENCE RUN N06°38'49"E, A DISTANCE OF 49.75 FEET; THENCE RUN N58°00'58"E, A DISTANCE OF 35.28 FEET; THENCE RUN N50°52'52"E, A DISTANCE OF 38.63 FEET; THENCE RUN N21°54'59"E, A DISTANCE OF 23.67 FEET; THENCE RUN N31°27'02"E, A DISTANCE OF 34.00 FEET; THENCE RUN N34°15'07"W, A DISTANCE OF 18.32 FEET; THENCE RUN N34°43'58"W, A DISTANCE OF 9.02 FEET; THENCE RUN N14°23'54"E, A DISTANCE OF 15.71 FEET; THENCE RUN N38°55'44"E, A DISTANCE OF 9.23 FEET; THENCE RUN N53°12'28"E, A DISTANCE OF 26.43 FEET; THENCE RUN N84°23'47"E, A DISTANCE OF 28.35 FEET; THENCE RUN N35°37'38"E, A DISTANCE OF 15.47 FEET; THENCE RUN N10°48'04"E, A DISTANCE OF 29.24 FEET; THENCE RUN N34°26'45"E, A DISTANCE OF 33.20 FEET; THENCE RUN N31°36'42"E, A DISTANCE OF 56.27 FEET; THENCE RUN N32°43'08"E, A DISTANCE OF 30.08 FEET; THENCE RUN N14°03'31"E, A DISTANCE OF 31.26 FEET; THENCE RUN N19°26'59"E, A DISTANCE OF 19.22 FEET; THENCE RUN N42°30'08"E, A DISTANCE OF 39.40 FEET; THENCE RUN N02°49'13"E, A DISTANCE OF 26.89 FEET; THENCE RUN N07°56'28"E, A DISTANCE OF 28.98 FEET; THENCE RUN N03°03'27"E, A DISTANCE OF 32.47 FEET; THENCE RUN N04°16'12"E, A DISTANCE OF 27.51 FEET; THENCE RUN N10°42'32"E, A DISTANCE OF 32.00 FEET; THENCE RUN N07°53'16"E, A DISTANCE OF 17.83 FEET; THENCE RUN N24°01'02"E, A DISTANCE OF 25.64 FEET; THENCE RUN N34°14'07"E, A DISTANCE OF 21.65 FEET; THENCE RUN N24°01'25"E, A DISTANCE OF 19.53 FEET; THENCE RUN N02°17'14"E, A DISTANCE OF 41.24 FEET; THENCE RUN N02°29'16"E, A DISTANCE OF 82.41 FEET; THENCE RUN N07°01'02"W, A DISTANCE OF 52.74 FEET; THENCE RUN N03°41'04"W, A DISTANCE OF 104.21 FEET; THENCE RUN N02°04'36"W, A DISTANCE OF 100.65 FEET; THENCE RUN N35°26'38"W, A DISTANCE OF 40.47 FEET; THENCE RUN N13°05'18"E, A DISTANCE OF 36.40 FEET; THENCE RUN N12°26'02"W, A DISTANCE OF 34.81 FEET; THENCE RUN N62°02'57"W, A DISTANCE OF 35.93 FEET; THENCE RUN N21°32'23"E, A DISTANCE OF 19.38 FEET; THENCE RUN S82°36'53"E, A DISTANCE OF 31.38 FEET; THENCE RUN N10°58'40"E, A DISTANCE OF 49.70 FEET; THENCE RUN N50°11'59"W, A DISTANCE OF 38.36 FEET; THENCE RUN N45°50'02"E, A DISTANCE OF 62.22 FEET; THENCE RUN N00°23'31"E, A DISTANCE OF 66.17 FEET; THENCE RUN N02°42'17"W, A DISTANCE OF 70.17 FEET; THENCE RUN N04°34'58"E, A DISTANCE OF 25.79 FEET; THENCE RUN N13°34'00"W, A DISTANCE OF 103.36 FEET; THENCE RUN N07°35'40"W, A DISTANCE OF 47.92 FEET; THENCE RUN N08°15'44"W, A DISTANCE OF 82.22 FEET; THENCE RUN N12°24'44"W, A DISTANCE OF 108.97 FEET; THENCE RUN N09°51'24"W, A DISTANCE OF 112.56 FEET; THENCE RUN N12°36'41"W, A DISTANCE OF 113.42 FEET; THENCE RUN N01°25'52"E, A DISTANCE OF 91.38 FEET; THENCE RUN N03°08'19"W, A DISTANCE OF 126.70 FEET; THENCE RUN N54°37'53"E, A DISTANCE OF 53.45 FEET; THENCE RUN N33°44'02"W, A DISTANCE OF 114.64 FEET; THENCE RUN N23°24'17"W, A DISTANCE OF 76.28 FEET TO A POINT ON THE SOUTH LINE OF SECTION 10, TOWNSHIP 24 SOUTH, RANGE 26 EAST; THENCE DEPARTING SAID WESTERLY LINE, RUN WEST ALONG THE SOUTH LINES OF SAID SECTION 10 AND OF SECTIONS 09, AND 08, TOWNSHIP 24 SOUTH, RANGE 26 EAST, A DISTANCE OF 11555.13 FEET TO THE SOUTHWEST CORNER OF SAID SECTION 08; THENCE

DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINES OF SAID SECTION 08 AND OF SECTION 05, TOWNSHIP 24 SOUTH, RANGE 26 EAST, TO THE NORTHWEST CORNER OF SAID SECTION 05; THENCE DEPARTING SAID WEST LINE, RUN WEST ALONG THE SOUTH LINE OF SECTION 31, TOWNSHIP 23 SOUTH, RANGE 26 EAST, TO THE SOUTHWEST CORNER OF SAID SECTION 31; THENCE DEPARTING SAID SOUTH LINE, RUN NORTH ALONG THE WEST LINES OF SAID SECTION 31 AND OF SECTION 30, TOWNSHIP 23 SOUTH, RANGE 26 EAST, TO THE NORTHWEST CORNER OF SAID SECTION 30; THENCE DEPARTING SAID WEST LINE, RUN EAST ALONG THE NORTH LINES OF SAID SECTION 30 AND OF SECTIONS 29, 28, 27, 26, AND 25, TOWNSHIP 23 SOUTH, RANGE 26 EAST, TO THE NORTHEAST CORNER OF SAID SECTION 25 AND THE POINT OF BEGINNING.

| Township 23<br>Range 25<br>Section 21  | Township 23 Range<br>25 Section 23   | Township 23 Range<br>25 Section 24                   | Township 23 Range<br>26 Section 19                   | Township 23 Range<br>26 Section 20   | Township 23 Range<br>26 Section 21          | Township 23 Range<br>26 Section 22                            | Township<br>23 Range 26<br>Section 23                 | Township<br>23 Range 26<br>Section 24                            |
|--|--|--|--|--|---|---|---|--|
| Township 23<br>Range 25<br>Section 28<br>23 Range<br>25 Section 27               | Lake Nettie Rd<br>Township 23<br>Range 25<br>Section 26                            | Ige Ave<br>Township<br>23 Range 25<br>Section 25     | Township 23<br>Range 26<br>Section 30<br>Bear Lake   | Township 23<br>Range 26<br>Section 29  | 23<br>Township<br>23 Range 26<br>Section 28 | Township 23<br>Range 26<br>Section 27                         | Five Mile Rd<br>Township 23<br>Range 26<br>Section 26 | Township 23<br>Range 26<br>Section 25                            |
| Kittla d Late<br>Township 23<br>Range 25<br>Section 34<br>Range 25<br>Section 33 | Township<br>23 Range 25<br>Section 35  | Township 23<br>Range 25 Bantly<br>Section 36         | Township 23<br>Range 26<br>Section 31                | Late Lotins<br>State Park<br>Township 23<br>Range 26<br>Section 32<br>Dixie Late | Township 23<br>Range 26<br>Section 33       | Township 23<br>Range 26<br>Section 34<br>Adain Lake           | Township<br>23 Range 26<br>Section 35                 | Township<br>23 Range 26<br>Section 36                            |
| Township 24<br>Range 25<br>Section 4<br>Township 24<br>Range 25<br>Section 3     | Township 24<br>Range 25<br>Section 2   | Cypress Lake<br>Township<br>24 Range 25<br>Section 1 | Wash<br>Lake<br>Township<br>24 Range 26<br>Section 6 | Township 24<br>Range 26<br>Section 5   | Township 24<br>Range 26<br>Section 4        | Township<br>24 Range 26<br>Section 3<br>Frank Jarrell Rd      | Dewgrass Lake<br>Township 24<br>Range 26<br>Section 2 | Township<br>24 Range 26<br>Section 1                             |
| Township<br>24 Range 25<br>Section 10<br>Township 24<br>Range 25<br>Section 9    | Township<br>24 Range 25<br>Section 11  | Township 24<br>Range 25<br>Section 12<br>Section Rev | Township<br>24 Range 26<br>Section 7                 | Township<br>24 Range 26<br>Section 8   | Township 24<br>Range 26<br>Section 9        | Township 24<br>Range 26<br>Section 10 U.S                     | Township 24<br>Range 26<br>Section 11                 | Range 26<br>Section 12   |
| Township 24<br>Township 24 Range 25<br>Range 25 Section 15<br>Section 16         | Township 24<br>Range 25<br>Section 14  | Township 24<br>Range 25<br>Section 13                | Township<br>24 Range 26<br>Section 18                | Township<br>24 Range 26<br>Section 17  | Township 24<br>Range 26<br>Section 16       | Solveras<br>Solveras<br>Township 24<br>Range 26<br>Section 15 | Township 24<br>Range 26<br>Section 14                 | Township 24<br>Range 26<br>Section 13                            |
| Township<br>24 Range 25<br>Section 21<br>Range 25<br>Section 22                  | Township 24<br>Range 25<br>Section 23  | Township 24<br>Range 25<br>Section 24                | Township<br>24 Range 26<br>Section 19                | Township 24<br>Range 26<br>Section 20  | Township 24<br>Range 26<br>Section 21       | Township 24<br>Range 26<br>Section 22                         | Township 24<br>Range 26<br>Section 23                 | Township 24<br>Range 26<br>Section 24                            |
| Township<br>24 Range<br>25 Section 28<br>Township 24<br>Range 25<br>Section 27   | Township 24<br>Range 25<br>Section 26  | Township 24<br>Range 25<br>Section 25                | Township<br>24 Range 26<br>Section 30                | Township<br>24 Range 26<br>Section 29  | Township 24<br>Range 26<br>Section 28       | Township 24 County<br>Range 26<br>Section 27                  | toad 47<br>Township 24<br>Range 26<br>Section 26      | Township 24<br>Range 26<br>Section 25<br>INCREMENTAPRNRCan, Esri |
|  | 25 Section 35  | Fewnship 24 Range To<br>25 Section 36                | wnship 24 Range<br>26 Section 31                     | Township 24 Range<br>26 Section 32   | Township 24 Range<br>26 Section 33          |   | Gamin, USGS, Intermat<br>butors, and the GIS User     |  |
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