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**REBUTTAL TESTIMONY OF CHARLES L. SWEAT  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
ON BEHALF OF  
SOUTHERN STATES UTILITIES, INC.  
DOCKET NO. 920199-WS**

1       **Q.     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR**  
2       **THE RECORDS.**

3       A.     I am Charles L. Sweat and my business address is 1000 Color  
4       Place, Apopka, Florida 32703.

5       **Q.     ARE YOU THE SAME CHARLES L. SWEAT WHO SUBMITTED**  
6       **PRE-FILED DIRECT TESTIMONY IN THIS PROCEEDING?**

7       A.     Yes, I am.

8       **Q.     COULD YOU BRIEFLY DESCRIBE THE PURPOSE OF YOUR**  
9       **REBUTTAL TESTIMONY?**

10      A.     My rebuttal will address the testimony presented by the witnesses  
11      from the Department of Environmental Regulation ("DER") and county  
12      regulatory agencies. The testimony from these witnesses does not  
13      refute my prior testimony that Southern States is providing safe,  
14      efficient and sufficient service to customers served by each of the  
15      127 systems included in this filing. I also will address the adjustment  
16      to test year revenues proposed by Public Counsel's witness Kimberly  
17      H. Dismukes concerning effluent sales on the Deltona Lakes system.

18      **Q.     HOW DO YOU PROPOSE TO ADDRESS THE TESTIMONY OF**  
19      **THESE QUALITY OF SERVICE WITNESSES?**

20      A.     First, it must be pointed out that a number of the DER witnesses (8)  
21      found no deficiency whatsoever for a number of our systems.

1 Additional DER witnesses (7) indicated that past deficiencies had  
2 been detected by the appropriate regulatory agency and corrected  
3 by the Company and two other witnesses praised our operations  
4 personnel. Of course, the sheer number of systems involved in this  
5 case and the emergence of new, amended and more strictly  
6 enforced laws, rules, and regulations in the recent past make it nearly  
7 impossible for this many systems to remain unscathed. However,  
8 the broad picture certainly casts a positive light on the quality of  
9 service we are providing to our customers and confirms my belief in  
10 the progress our Company is making toward becoming the preferred  
11 provider of water and wastewater services. In this regard, I note that  
12 small "package plants" are not particularly the favorites of regulatory  
13 authorities in the past. Owners of these systems often are  
14 developers who lose interest in their operation after a development  
15 is approaching build out or built out completely. Other owners of  
16 such systems have found it increasingly difficult to keep up with  
17 regulatory requirements and, more often than not, are unable to do  
18 so. These systems often are located where no interconnection with  
19 a central water or sewer system is available or at least such  
20 interconnect would not be economically feasible. Therefore, history  
21 has confirmed that counties and municipalities are reluctant to

1           acquire them. For these systems in particular, Southern States has  
2           demonstrated its willingness to bring their services into compliance  
3           with regulatory requirements and insure safe, sufficient and efficient  
4           service.

5           As noted by a number of DER witnesses, a portion of the  
6           systems included in this proceeding service less than 350 persons  
7           and thus are exempt from certain regulatory requirements. The flip  
8           side of this exemption is that the exemptions often are provided, at  
9           least in part, in recognition of the inability of the customers served by  
10          such systems to afford the rates which would result if the exemptions  
11          did not exist. I believe the level of plant in service additions which  
12          Southern States has made in these systems, which are identified in  
13          the MFRs, confirm the Company's commitment to providing these  
14          customers with the same high quality services currently provided to  
15          customers on our larger systems. However, the Company's feeble  
16          economic circumstances occasionally have hampered our efforts in  
17          this regard. The remainder of my testimony will address primarily  
18          those areas of concern identified by the quality of service witnesses  
19          from the DER and county offices and identify how the Company has  
20          alleviated such concerns. For simplicity's sake, I have addressed the  
21          witnesses in alphabetical order.

1       **Q.    BEFORE ADDRESSING THE TESTIMONY OF THE QUALITY OF**  
2       **SERVICE WITNESSES, DO YOU HAVE ANY GENERAL**  
3       **STATEMENTS CONCERNING THE TESTIMONY OF SEVERAL OF**  
4       **THE WITNESSES?**

5       A.    Yes.  Several witnesses have indicated that they were unable to  
6       locate a cross-connection control program in the DER files for several  
7       systems.  Southern States has indeed established a cross-  
8       connection control program for each of its systems.  Copies of the  
9       program were provided to each DER office in April 1989.  Perhaps  
10      DER did not deposit a copy of the program in each "file" for every  
11      system we own and operate.  However, we do have this program  
12      and we did file the program with DER as required.  The program now  
13      is being revised to meet a new DER rule.  The new program is  
14      scheduled to be filed with the DER offices during the week of  
15      October 28.

16      **Q.    WILL YOU MAKE ANY REMARKS ABOUT THE TESTIMONY OF**  
17      **MS. SANDRA ANDINO-SEQUEIRA REGARDING THE ZEPHYR**  
18      **SHORES MOBILE HOME ESTATES WATER SYSTEM IN PASCO**  
19      **COUNTY?**

20      A.    Yes.  I know of no open DER enforcement case against this system  
21      and our records do not reflect any such case.

1       **Q.    DO YOU WISH TO MAKE COMMENT ON THE TESTIMONY OF**  
2       **ROBERTO ANSAG AS IT APPLIES TO YOUR CITRUS PARK AND**  
3       **SALT SPRINGS OPERATIONS IN MARION COUNTY, AND THE**  
4       **DAETWYLER SHORES, LAKE CONWAY PARK AND WESTMONT**  
5       **WATER SYSTEMS IN ORANGE COUNTY?**

6       **A.    No, only that I concur with the testimony.**

7       **Q.    DO YOU HAVE ANY COMMENTS REGARDING THE TESTIMONY**  
8       **OF BRENDA BALL REGARDING THE APACHE SHORES, CITRUS**  
9       **SPRINGS, GOLDEN TERRACE, GOSPEL ISLAND, OAK**  
10      **FORREST, PINE RIDGE, POINT O' WOODS, ROLLING GREEN**  
11      **AND ROSEMONT WATER SYSTEMS IN CITRUS COUNTY?**

12      **A.    Yes. Ms. Ball refers to the Point O'Woods system and difficulties**  
13      **with high iron levels, a situation of which the utility is fully aware.**  
14      **During drilling operations in September a required well developed a**  
15      **sink hole. The circumstances that followed are well documented in**  
16      **Ms. Ball's testimony. The utility approached DER and was given an**  
17      **extension of time to complete the work by Pedro Riveria until**  
18      **November 3rd.**

19                **Ms. Ball commented that the Golden Terrace system was**  
20      **issued a warning notice due to the MCL's for iron being exceeded.**  
21      **I wish to advise the Commission that Mr. Joseph Mack, West Region**

1           Engineer, stated that upon recent re-testing, all levels met  
2           requirements. Along with the new well, iron removal filters are being  
3           installed at the Point O' Wood water treatment facility.

4           **Q. DO YOU HAVE ANYTHING ELSE TO ADD TO MS. BALL'S**  
5           **TESTIMONY?**

6           A. Yes. Ms. Ball testified that on June 16th she returned the Lead and  
7           Copper Sampling Plan to our Citrus Springs facility for four  
8           deficiencies. The deficiencies reported were in brief: no records  
9           review checklist, no materials survey, no page numbers, and no map.  
10          All deficiencies have been corrected and the plan accepted per Ms.  
11          Ball's letter to our Citrus Springs office dated October 20th. A copy  
12          of both the deficiency letter of June 16, 1992 and the acceptance  
13          letter of October 20, 1992 is attached as Exhibit \_\_\_\_ (CLS-3).

14          **Q. WILL YOU COMMENT ON THE TESTIMONY OF MR. ROBERT**  
15          **BARKER AS IT PERTAINS TO SOUTHERN STATES' PALM**  
16          **TERRACE, ELL-NAR FACILITIES IN PASCO COUNTY?**

17          A. Yes, but only one. Mr. Barker commented that sampling is due for  
18          the Ell-Nar system covering turbidity, primary organics, etc. We wish  
19          to advise Mr. Barker that the sampling kits were received on October  
20          21st, as reported by our operator Mr. John Levesque, and samples  
21          should be forwarded to DER shortly.

1           **Q.    WOULD YOU COMMENT ON THE TESTIMONY OF MR. PETER**  
2                   **BURGHARDT AS IT RELATES TO YOUR PALM TERRACE AND**  
3                   **ZEPHYR SHORES WASTEWATER SYSTEMS IN PASCO**  
4                   **COUNTY?**

5           **A.    Yes. Mr. Burghardt references inadequate effluent disposal capability.**  
6                   **The Company has taken corrective action in the form of a Bulk**  
7                   **Service Agreement with Pasco County which will allow the Company**  
8                   **to divert flows from the Zephyr Shores treatment facility. Before**  
9                   **diversion can take place the installation of a force main and pumping**  
10                  **station must be completed. The Company has signed a construction**  
11                  **contract and the work is scheduled for completion before the end of**  
12                  **1992. Upon the diversion of flows the existing effluent disposal**  
13                  **facilities will adequately handle the remaining flow.**

14                         **Mr. Burghardt testified on page 4 of his testimony that the**  
15                         **facilities at Palm Terrace showed that the operations staff was not**  
16                         **reporting abnormal events as required. The Company's operators**  
17                         **have been adequately trained on the reporting of abnormal events,**  
18                         **the proper use of log books, and are instructed to follow written**  
19                         **reporting procedures. Mr. Burghardt confirmed that adequate**  
20                         **training of the use of log books was provided upon reinspection.**

21           **Q.    DO YOU HAVE ANY COMMENTS REGARDING THE TESTIMONY**



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**OF MR. THOMAS CHERUKARA ON THE BURNT STORE WATER SYSTEM LOCATED IN CHARLOTTE AND LEE COUNTIES?**

A. Yes. Mr. Cherukara indicated that the Burnt Store water system is under enforcement action by the Tampa DER office for industrial wastewater violations. This enforcement action is a creature of inherent disagreements between RO users and regulatory agencies, including DER, regarding proper disposal alternatives. The utility received a proper construction permit from DER, but not the required permit for additional concentrate disposal. Without this second permit, the utility cannot expand the plant, nor meet the additional demand of new residents. The recommendation of DER's Southwest District staff is to develop shallow wells. However, the Company believes the associated investment would be exorbitant, and not in the best interests of our customers.

**Q. HAVE YOU ANY COMMENTS REGARDING THE TESTIMONY OF MR. WILLIAM DARLING AS IT PERTAINS TO THE EAST LAKE HARRIS ESTATES, MORNINGVIEW, PALISADES, PALMS MOBILE HOME PARK, STONE MOUNTAIN, SUNSHINE PARKWAY, VENETIAN VILLAGE AND WESTERN SHORES WATER SYSTEMS IN LAKE COUNTY; AND THE KINGSWOOD AND OAKWOOD SYSTEMS IN BREVARD COUNTY?**

1 A. Yes. I would like to say that I concur with Mr. Darling's testimony.

2 Q. HAVE YOU ANY COMMENTARY ON THE TESTIMONY OF MS.  
3 LYNAL DEFALCO AS IT PERTAINS TO YOUR KEYSTONE  
4 HEIGHTS, LAKEVIEW VILLAS AND POSTMASTER VILLAGE  
5 WATER SYSTEMS IN PUTNAM COUNTY?

6 A. Yes. Ms. Defalco indicates that our Postmaster Village does not  
7 have adequate auxiliary power. I would like to report to Ms. Defalco  
8 and to the Commission that the purchase of an auxiliary power  
9 source has been budgeted for 1993.

10 Q. DO YOU HAVE ANY COMMENTS REGARDING THE TESTIMONY  
11 OF MR. PETER F. DENTICE ON THE APPLE VALLEY,  
12 CHULUOTA, CITRUS PARK, DELTONA LAKES, FLORIDA  
13 CENTRAL, HOLIDAY HAVEN, JUNGLE DEN, MEREDITH MANOR,  
14 MORNINGVIEW, SALT SPRINGS, SOUTH FORTY, SUGAR MILL,  
15 SUNSHINE PARKWAY, UNIVERSITY SHORES AND VENETIAN  
16 VILLAGE WASTEWATER SYSTEMS LOCATED IN LAKE, MARION,  
17 ORANGE, SEMINOLE AND VOLUSIA COUNTIES?

18 A. Yes. Referring to our Holiday Haven facilities, Mr. Dentice indicates  
19 that we need to replace the catwalk supports and remove excess  
20 vegetation from the existing percolation ponds and regularly mow the  
21 plant facilities. I wish to advise the Commission that the rusted

1 catwalk was reported as being replaced in the Company's  
2 Environmental Compliance Status Report of June 30, 1992. Also, the  
3 vegetation and mowing has been addressed and Mr. Bill Yocum,  
4 plant manager, has confirmed to me that the ponds were thoroughly  
5 cleaned in August.

6 Mr. Dentice also referred to the bioassay test conducted by  
7 the DER in conjunction with the Orange County Environmental  
8 Protection Department. The results of those tests have come back  
9 reporting that the effluent was acutely toxic. After receiving the  
10 Department's letter on April 15th a meeting was scheduled and held  
11 on May 5th to discuss a re-sampling action plan. A letter dated May  
12 14th was addressed to Ms. Christina C. Ferraero, P.E., of the DER  
13 outlining the re-sampling and testing procedures which included  
14 additional chemical analysis. On June 3, 1992 the Company  
15 received an acceptance letter from the Department signed by Carlos  
16 Riviera deAugilar. As of this date there have been no formal results  
17 from the retesting. Also, Mr. Dentice testified that there is effluent  
18 ponding at the University Shores No. 2 plant drain field. My  
19 investigation reveals that the ponding which is observed is that of  
20 rain water only, and not effluent. Further, Mr. Dentice testified that  
21 the percolation ponds are discharging to surface waters. This hardly

1 seems possible in that the ponds are an appreciable distance from  
2 a surface water source, however, further investigation will continue  
3 on this point.

4 **Q. DO YOU HAVE ANY COMMENTS REGARDING THE TESTIMONY**  
5 **OF MR. WILLIAM C. DUNN ON YOUR SPRING HILL WATER**  
6 **SYSTEM IN HERNANDO COUNTY?**

7 A. Yes. I wish to thank Mr. Dunn for his congenial comments regarding  
8 our operating staff at Spring Hill, and in particular Mr. Ricky Leach.  
9 These comments have been passed on to Mr. Leach.

10 **Q. DO YOU HAVE ANY REMARKS REGARDING THE TESTIMONY**  
11 **OF MR. ROMEO ENAGE ABOUT YOUR APPLE VALLEY,**  
12 **CHULUOTA, DOL RAY MANOR, DRUID HILLS, FERN PARK,**  
13 **HARMONY HOMES, LAKE BRANTLEY, LAKE HARRIET ESTATES**  
14 **AND MEREDITH MANOR WATER SYSTEMS IN SEMINOLE**  
15 **COUNTY?**

16 A. Yes. Mr. Enage's only concern related to Radium-226 and Radium  
17 228 levels on the Chuluota system. Our operating staff has reported  
18 that they have completed the recheck samples for these  
19 contaminants as of August 1992. The results indicate full compliance  
20 and no additional sampling is required. The Company sent a letter  
21 confirming this fact to the DER on October 14, 1992, along with the

1 results of the sampling.

2 **Q. DO YOU HAVE COMMENTS REGARDING THE TESTIMONY OF**  
3 **MR. GERALD FOSTER ON HIS INSPECTION OF THE MARION**  
4 **OAKS AND SAMIRA VILLAS WATER SYSTEMS IN MARION**  
5 **COUNTY?**

6 **A. Yes. I concur with Mr. Foster's testimony.**

7 **Q. WOULD YOU COMMENT ON THE TESTIMONY OF MR. ROBERT**  
8 **GLENN REGARDING YOUR MARCO SHORES WATER FACILITY**  
9 **IN COLLIER COUNTY AND YOUR LEISURE LAKES SYSTEM IN**  
10 **HIGHLANDS COUNTY?**

11 **A. Yes. Mr. Glenn stated that the Leisure Lakes generator does not**  
12 **have automatic start capability. This is no longer accurate. The**  
13 **automatic start capacity was installed in 1991. Mr. Glenn also**  
14 **mentioned that the wells at Leisure Lakes are within 100 feet of the**  
15 **generator's fuel tank which has no spill containment facility and may**  
16 **be a safety hazard. While it is true that the generator's fuel tank**  
17 **does not have a containment structure, I note that Chapter 17-762**  
18 **of the Florida Administrative Code states that containment structures**  
19 **are not required for an above ground tank of 100 gallons. However,**  
20 **the Company will readdress the issue of the containment structure**  
21 **in order to assure protection of our potable water supply.**

1           Mr. Glenn indicated that there were minor leaks at Leisure  
2           Lakes. However, he did not identify what leaks he was referring to.  
3           We believe he may be referring to a minor leak at the site gauge  
4           located on the pressure tank. This gauge was repaired. Mr. Glenn  
5           referred to the log book suggesting that it did not contain all of the  
6           required information. Mr. Dave Denny, our South Region Manager,  
7           has addressed this issue with his operations staff, and the required  
8           information now is being logged. Mr. Glenn further stated that the  
9           generator was not periodically run under full load as required. Mr.  
10          Denny also has addressed this with appropriate operations  
11          personnel, and the generator is being run as required.

12          **Q. DO YOU HAVE ANY COMMENTS REGARDING THE TESTIMONY**  
13          **OF MR. JAMES GROB ON YOUR LEISURE LAKES SYSTEM IN**  
14          **HIGHLAND COUNTY, AND THE MARCO SHORES WASTEWATER**  
15          **SYSTEM IN COLLIER COUNTY?**

16          A. Yes. I wish to state that I concur with the testimony of Mr. Grob.

17          **Q. MR. SWEAT, DO YOU HAVE ANY COMMENTS REGARDING THE**  
18          **TESTIMONY OF MR. THOMAS HAMILTON OF THE DUVAL**  
19          **COUNTY PUBLIC HEALTH UNIT ON YOUR BEACON HILLS AND**  
20          **WOODMERE WATER FACILITIES IN DUVAL COUNTY?**

21          A. Yes. Mr. Hamilton states that there is insufficient chlorine contact

1 times at all three plants, and we wish to advise Mr. Hamilton and  
2 the Commission that the Company plans to initiate the chlorination  
3 point at the entry of the groundwater storage tank. By using this  
4 procedure, it will utilize the full capacity of the groundwater storage  
5 tank, thus chlorine contact time should be sufficient.

6 Also, Mr. Hamilton indicates that the Cobblestone plant is at  
7 times supplying more water than its design capacity, and in order for  
8 the interconnection with the Beacon Hills system to suffice for  
9 meeting demand, the Cobblestone plant production must be limited  
10 to the plant design. We wish to advise Mr. Hamilton and the  
11 Commission that our North Region Engineer, Mr. Robert Regalado,  
12 has advised that our engineering staff has designed an additional 10"  
13 loop between Beacon Hills and Cobblestone that will relieve some  
14 demand from Cobblestone. Also, a second well has been budgeted  
15 for Cobblestone to be installed in 1993. This will alleviate the  
16 demand problem. Additional storage capacity is expected to be  
17 added sometime in 1994.

18 **Q. DO YOU HAVE COMMENTS REGARDING THE TESTIMONY OF**  
19 **MS. CINDY HAYNIE AS IT PERTAINS TO YOUR HOLIDAY**  
20 **HEIGHTS AND UNIVERSITY SHORES WATER SYSTEMS IN**  
21 **ORANGE COUNTY?**

1 A. No comment, other than to say that I agree with her testimony.

2 **Q. WILL YOU COMMENT ON THE TESTIMONY OF MR. CHARLES**  
3 **HOURIET REGARDING YOUR AMELIA ISLAND, BEECHERS**  
4 **POINT, PALM PORT, PARK MANOR AND SILVER LAKE OAKS**  
5 **WASTEWATER SYSTEMS IN NASSAU AND PUTNAM COUNTIES?**

6 A. I have only one comment regarding the Beecher's Point WWTP, Mr.  
7 Houriet stated that the average nitrate-nitrogen level during the  
8 period 6/91 to 5/92 was 15 D. This exceeds the permitted level of  
9 12 D. We believe the cause to be the age of the sludge and  
10 elevated D.O. level. In an effort to lower nitrate levels, we have  
11 increased the sludge removal rate, and put all blowers on separate  
12 timers. The pulleys were changed where needed to decrease the  
13 volume of air. Nitrate levels now are below MCLs.

14 **Q. WILL YOU COMMENT ON THE TESTIMONY OF MR. CHARLES**  
15 **HUBSCH FROM THE CITY OF JACKSONVILLE CONCERNING**  
16 **THE BEACON HILLS AND WOODMERE WASTEWATER SYSTEM?**

17 A. I have no comment other than that I basically agree with his  
18 testimony.

19 **Q. WILL YOU ADDRESS THE TESTIMONY OF MS. MIRIAM HUNT-**  
20 **BOATENG REGARDING YOUR BAY LAKES ESTATES,**  
21 **FOUNTAINS, INTERCESSION CITY, LAKE AJAY VILLAGE,**



1           **PINERIDGE ESTATES, TROPICAL PARK AND WINDSONG**  
2           **WATER SYSTEMS IN OSCEOLA COUNTY?**

3           **A. Ms. Hunt-Boateng asserts that Intercession City's hydropneumatic**  
4           **tank shows evidence of corrosive pitting and should be repaired or**  
5           **replaced. This tank is approximately 10 years old, and the pitting**  
6           **she is referring to is surface pitting on the outside of the tank. It is**  
7           **my opinion that this is not a major problem. Our operations and**  
8           **maintenance staff have thoroughly inspected the tank and have**  
9           **scheduled the sand blasting and painting the tank. The tank will be**  
10           **taken from service to be completely cleaned and coated. We**  
11           **anticipate that the surface pitting problem will disappear after these**  
12           **measures are completed.**

13                       **Ms. Hunt-Boateng also refers to our Windsong system's**  
14           **history of pumping sand. The Company believes that this problem**  
15           **was corrected when a 6" liner was installed in 1991. Some sand**  
16           **reappeared in the distribution system in September 1992, however,**  
17           **the operating staff opened the tank and cleaned the sand from the**  
18           **inside. The well was flushed with the well driller present and there**  
19           **was no sand visible. Therefore, the Company believes that the sand**  
20           **was a residual product from the period prior to the well's repair.**

21           **Q. WOULD YOU COMMENT ON MR. HOSSEIN KADIVAR'S**

1           **TESTIMONY REGARDING TO YOUR CARLTON VILLAGE, FERN**  
2           **TERRACE, FRIENDLY CENTER, GRAND TERRACE, HOBBY**  
3           **HILLS, IMPERIAL MOBILE TERRACE, PICCIOLA ISLAND, PINEY**  
4           **WOODS, QUAIL RIDGE, SILVER LAKE ESTATES AND SKYCREST**  
5           **WATER SYSTEMS IN LAKE COUNTY?**

6           A.    Yes. Mr. Kadivar's only pertinent comment relating to our Carlton  
7           Village plant concerns a well pump which was changed out on an  
8           emergency basis at 2:00 a.m. in 1988. This change out was  
9           explained to DER several times and DER never sought enforcement  
10          action until 1992. We are confident that no adverse finding will result  
11          from this occurrence.

12                        Regarding Fern Terrace, DER's rules state that a second well  
13                        is not necessary if the population served does not exceed 350. The  
14                        Company has gathered an abundance of census data which clearly  
15                        indicates a total population of under 350 served by this system.  
16                        However, to date, DER refuses to accept our findings. Due to the  
17                        existence of an ordinance which prohibits drilling a well within city  
18                        limits, we would have extreme difficulty finding a suitable location for  
19                        an additional well if this requirement is imposed on us. The  
20                        Company has sought a waiver of the ordinance, but to date our  
21                        requests have been denied. Thus, to drill a second well would

1 require finding suitable land, well outside the community, which  
2 would be quite expensive for our customers.

3 **Q. WOULD YOU PLEASE ADDRESS MR. JAMES R. MAHER'S**  
4 **TESTIMONY REGARDING YOUR BEECHERS POINT, HERMITS**  
5 **COVE, INTERLACHEN LAKE ESTATES, PALM PORT, PARK**  
6 **MANOR, POMONA PARK, RIVER GROVE, RIVER PARK,**  
7 **SARATOGA HARBOR, SILVER LAKE OAKS, ST. JOHNS**  
8 **HIGHLANDS, WELAKA AND WOOTENS WATER SYSTEMS**  
9 **LOCATED IN PUTNAM COUNTY?**

10 **A.** Mr. Maher states that during a field inspection at Interlachen Lake  
11 Estates it was noted that the system does not have adequate  
12 auxiliary power. A permit has been issued to install the auxiliary  
13 power source, and the generator is in place. Start-up should be  
14 completed within 20 days through our consulting company,  
15 Development Services.

16 The alleged lack of generation capacity at our Pomona Park  
17 system is currently being evaluated by our consultant, Mr. David  
18 Ross of REFP Engineering Services. We hope to have his report  
19 shortly.

20 Regarding the need for an auxiliary power generator at our  
21 Saratoga Harbor system, let me state that the Company has 155

1 water and wastewater systems. It is impossible to make this type of  
2 improvement to all of our systems to meet DER rules over night, or  
3 even in one year. We just do not have enough time or staff,  
4 particularly with existing budget constraints. However, we are doing  
5 everything possible in the most expeditious manner possible.

6 **Q. DO YOU WISH TO REBUT MR. MAHER'S COMMENTS ON**  
7 **WHETHER THE WATER PRODUCED BY THE SYSTEMS MEET**  
8 **STATE AND FEDERAL MAXIMUM CONTAMINANT LEVELS FOR**  
9 **PRIMARY AND SECONDARY WATER QUALITY STANDARDS?**

10 **A.** Yes. Mr. Maher indicates that water from our Beecher's Point system  
11 does not meet the primary MCL for sodium, or the secondary MCL's  
12 for chlorides. We are aware that our Beecher's Point system has  
13 some problems, and we have been actively working with the City of  
14 Welaka on an interconnect. The Company has been in contact  
15 almost weekly with Welaka (Hon. William Dollar) and most of the  
16 details of the interconnect have been worked out. Welaka has plans  
17 to award the contract to Cen-State Constructors on or about  
18 November 5th for the installation of the City's new distribution  
19 system, and the Company should be able to complete our  
20 interconnection in early 1993.

21 With regard to Hermits Cove not meeting secondary MCL's for

1 Manganese and TDS, the Company believes that an error has  
2 occurred in the testing laboratory. On October 21, 1992, test sample  
3 kits were obtained by our operating personnel to re-sample using  
4 three laboratories - our regular lab and two other certified labs. This  
5 system has experienced no prior manganese problem and a review  
6 of other pertinent parameters make the operations people suspect  
7 a failure in the testing laboratory. A complete evaluation of the  
8 system is also being conducted by Hartman and Associates and a  
9 report is due in November 1992.

10 We also believe that something is amiss in the testing  
11 laboratory regarding our Pomona Park system. The same procedure  
12 is being established for Pomona Park as with Hermits Cove. When  
13 the system was re-checked, there were two days of very acceptable  
14 readings, but test results from the third day were 25 times above the  
15 limit, which leads the operators to doubt the integrity of the  
16 laboratory procedures. A complete evaluation of the system also is  
17 being conducted by Hartman and Associates and a report is due in  
18 November 1992.

19 With regard to our River Park water system, we are awaiting  
20 results from our consulting engineer, Hartman and Associates (Mr.  
21 Gary ReVoir), which should be completed in November 1992. The

1 same consulting firm also is handling the problem with Saratoga  
2 Harbour.

3 Regarding Mr. Maher's testimony concerning our Silver Lake  
4 Oaks system and the fluctuation of iron levels, on a 3 day re-check  
5 the levels were at .24 which satisfied the .3 level, and on June 18,  
6 1992 Mr. Maher stated in a letter that "this systems meets or exceeds  
7 State and Federal drinking water standards." Mr. Maher's letter is  
8 attached as Exhibit \_\_\_ (CLS-4).

9 The Wootens system is being evaluated by Hartman and  
10 Associates (Mr. Gary ReVoir), and his report should be completed  
11 in November 1992, at which time we will of course advise DER of our  
12 findings and plans.

13 **Q. DO YOU WISH TO COMMENT ON THE TESTIMONY OF MS.**  
14 **DEBORAH L. OBLACZYNSKI ON THE MARTIN COUNTY**  
15 **SYSTEMS?**

16 **A.** Yes. Ms. Oblaczynski commented that she observed deficiencies,  
17 such as no permit for loss of chlorine alarms. I wish to advise the  
18 Commission that in 1990, our Environmental Compliance  
19 Administrator, Mr. Mel Fisher, was advised verbally by the DER that  
20 the installation of loss of chlorine alarms did not require a permit.  
21 Recently, Bruce Paster, P.E., our Senior Project Engineer, contacted

1 DER's Mr. Donald B. White on this chlorine alarm permit question,  
2 and other questions, such as the survey on the Fisherman's Haven  
3 and Leilani Heights water systems. A copy of this communication is  
4 attached as Exhibit \_\_\_ (CLS-5).

5 Mr. Fisher has indicated that the utility is still searching for the  
6 cause of the elevated iron levels at Fox Run. As indicated by Ms.  
7 Oblaczynski, we have installed several new iron filters at Fox Run,  
8 and the levels of iron at well #1 are still elevated. This anomaly  
9 currently is being checked by Mr. Fisher and our operations staff.

10 **Q. DO YOU WISH TO COMMENT ON MR. JOHN H. POPE'S**  
11 **REMARKS REGARDING YOUR SUNNY HILLS WATER SYSTEM**  
12 **IN WASHINGTON COUNTY?**

13 **A.** No, other than to say that his testimony reflects the high quality of  
14 our operation of this facility.

15 **Q. WILL YOU COMMENT ON THE TESTIMONY OF MR. ROBERT**  
16 **REINING REGARDING YOUR SUNNY HILLS WASTEWATER**  
17 **SYSTEM IN WASHINGTON COUNTY?**

18 **A.** No, other than to say that the Sunny Hills system is a well run facility,  
19 and Mr. Reining's testimony reflects this.

20 **Q. MR. SWEAT, DO YOU HAVE ANY COMMENTS CONCERNING**  
21 **THE TESTIMONY OF MR. PETER SCRENOCK REGARDING THE**

1                   **CRYSTAL RIVER AND SUGARMILL WOODS WATER SYSTEMS**  
2                   **IN CITRUS COUNTY?**

3           A.     Yes. I would like to say that these two facilities also are clear  
4                   demonstrations of the Company's commitment to providing  
5                   customers with high quality services.

6           **Q.     DO YOU WISH TO COMMENT ON MR. NEAL SCHOBERT'S**  
7                   **TESTIMONY CONCERNING YOUR MARION OAKS**  
8                   **WASTEWATER FACILITY IN MARION COUNTY?**

9           A.     Yes. Mr. Schobert referenced in his July 28th letter that July 9th  
10                   and July 16th inspections were conducted and only four alleged  
11                   deficiencies for this large facility were indicated. The Company  
12                   responded to Mr. Schobert on August 14th noting that either the  
13                   deficiencies already had been taken care of, or were being  
14                   addressed currently.

15          **Q.     DO YOU HAVE ANY REMARKS CONCERNING THE TESTIMONY**  
16                   **OF MR. VINCENT SEIBOLD REGARDING YOUR AMELIA ISLAND**  
17                   **WATER SYSTEM?**

18          A.     No.

19          **Q.     DO YOU WISH TO COMMENT ON THE TESTIMONY OF JOE**  
20                   **SQUITIERI REGARDING YOUR SPRING HILL SYSTEM IN**  
21                   **HERNANDO COUNTY, AND THE APACHE SHORES, CITRUS**



1           **SPRINGS, POINT O' WOODS AND SUGARMILL WOODS**  
2           **WASTEWATER SYSTEMS IN CITRUS COUNTY?**

3           A.    Yes.  Regarding the Point O' Woods system and particularly the  
4           ponds, this item has been addressed by our engineering  
5           department, and pond cleaning has been budgeted for 1993.

6                         Yes.  Mr. Squitieri refers to the audible and visual alarms and  
7           the fact that they were not functioning at the time of the visit.  These  
8           alarms were repaired on or before July 1st, 1992.

9                         Mr. Squitieri testified on the overflow problem in the Spring Hill  
10          Subdivision.  It is true that there have been overflows in the past.  
11          The developer of the subdivision was required by our developer's  
12          agreement to have all flows from the subdivision directed to the  
13          master lift station located on County Line Road.  However, an interim  
14          agreement between the developer and the Company temporarily  
15          allowed the developer to divert these flows to a smaller lift station.  
16          As the subdivision increased in size, the interim lift station was unable  
17          to handle the substantial flows.  Coupled with the high flows were  
18          power outages due to lightning strikes, which also caused overflows.  
19          The Company has begun to apply pressure to the developer to  
20          arrange for the flows to go to the master lift station on County Line  
21          Road, and we have been advised that the developer has in fact

1 submitted plans to the DER, and is expecting approval and permits.  
2 As a short term solution, the operating staff is at a minimum checking  
3 this lift station three times a day, seven days a week. During periods  
4 of thunder storms, the operations staff may check the lift station  
5 more frequently. There have been no instances of overflows since  
6 the operations staff have taken these actions since the end of August  
7 1992.

8 The engineering department at the utility was unaware of any  
9 odor complaints at Sugarmill Woods, and will address the matter  
10 immediately with our operations department on site.

11 Mr. Squitieri spoke about sketchy and incomplete reporting at  
12 Sugarmill Woods regarding groundwater monitoring. The utility had  
13 experienced some difficulty in the past with staff. However, with a  
14 staff change that was made in late 1991, the complexion and  
15 composition of our reporting significantly changed. DER was notified  
16 of this change and we ask that you refer to the attached Exhibit \_\_\_\_  
17 (CLS-6) which contains a copy of our letter to Mr. David  
18 MacColeman which is dated November 19, 1991.

19 Mr. Squitieri indicates that "some slopes of collection lines are  
20 inadequate to meet 2.0 ft/sec and requires periodic flushing". Both  
21 the Company's engineering and operations departments are

1 confused by this statement, and we request clarification of this  
2 statement.

3 Mr. Squitieri also references a non-compliance letter mailed to  
4 the Company on or about April 9th which he alleges "was not  
5 responded to and if violations continue will result in the beginning of  
6 enforcement." On April 29th our Environmental Compliance  
7 Administrator responded to an April 9th letter from Mr. David G.  
8 MacColeman concerning Sugarmill Woods, addressing in detail all  
9 of the concerns that Mr. MacColeman had identified concerning the  
10 Sugarmill Woods system. A copy of this letter is attached hereto as  
11 Exhibit \_\_\_\_ (CLS-7).

12 **Q. DO YOU HAVE ANY COMMENT REGARDING MR. THIEL'S**  
13 **TESTIMONY REGARDING THE MARTIN COUNTY WASTEWATER**  
14 **SYSTEMS?**

15 **A.** Yes. I would like to address Mr. Thiel's comments regarding the Fox  
16 Run wastewater treatment facility and particularly the effluent disposal  
17 system. The effluent disposal system at the Fox Run plant is an  
18 under-drain drip system located adjacent to the treatment plant on  
19 a small parcel of land, about the size of a small building lot. For the  
20 most part, the drain system has work satisfactorily, with the exception  
21 of periods of heavy rains.

1           When the Company started experiencing ponding in the  
2 disposal area, rehabilitation of the under-drain was conducted which  
3 greatly improved the situation, but has not solved it. The schedule  
4 which Mr. Thiel references was arrived at during a meeting between  
5 the Company and the DER. At this meeting, a number of options  
6 were discussed which were not acceptable to DER. Ultimately, we  
7 agreed to tie the Fox Run system into a regional system which is  
8 expected to be available in mid-1993.

9           Regarding Leilani Heights, Mr. Thiel stated that the wastewater  
10 treatment capacity will soon be reached. The Company is aware of  
11 this fact, however, we would like to mention to Mr. Thiel and the  
12 Commission that Leilani Heights is almost at build-out. Mr. Thiel  
13 references a June 2, 1992 inspection, a subsequent non-compliance  
14 letter, and the Company's response of June 25th. It should be  
15 mentioned that the standby blower was never a part of the report,  
16 in that this blower was in for repairs at the time of the inspection.

17           At the Fisherman's Haven facility, the Company's operating  
18 staff monitors the well located at the treatment plant site. The private  
19 well was installed after the wastewater treatment plant was  
20 constructed and we have monitored and will continue to monitor the  
21 water supply for the customers of Fisherman's Haven. The

1           Company will do everything possible to insure that the ground water  
2           supply is protected.

3           **Q.   DO YOU HAVE ANY COMMENTS REGARDING THE TESTIMONY**  
4           **OF MR. RAYMOND VAN LOON AS IT APPLIES TO YOUR**  
5           **DELTONA LAKES, JUNGLE DEN AND SUGAR MILL WATER**  
6           **SYSTEMS?**

7           A.   Yes.  Mr. Van Loon mentions that the secondary standards at  
8           Deltona Lakes exceeded the MCL's in 1990.  I recall this problem,  
9           and I also recall rechecks being made.  At this moment the records  
10          are not available to me, however, I believe the samples were taken  
11          from Well Nos. 9, 12, 14, and 16 showing chlorides, color and TDS  
12          to exceed MCL.  Iron samples were taken from the distribution  
13          system.  Samples taken from Well Nos. 6, 8 and 27 showed TDS  
14          exceeding the MCL.  However, rechecks showed that all came back  
15          below the MCL.  The Company is planning to drill 3 new wells in  
16          1993.  These new wells should help to reduce the chloride and TDS  
17          levels during the high pumping months of summer when demand is  
18          highest.

19          **Q.   DO YOU HAVE ANY REMARKS REGARDING THE TESTIMONY**  
20          **OF MR. HARLEY W. YOUNG CONCERNING YOUR BURNT**  
21          **STORE WASTEWATER SYSTEM IN CHARLOTTE/LEE?**

- 1       A.     I only wish to say that I concur with Mr. Young's testimony.
- 2       **Q.     DO YOU HAVE ANYTHING FURTHER YOU WISH TO SAY**  
3       **REGARDING THE QUALITY OF SERVICE BEING PROVIDED TO**  
4       **THE 127 IN THIS PROCEEDING?**
- 5       A.     Yes. I believe the information provided in this testimony confirms the  
6       fact that the quality of service being provided to each of the 127  
7       systems is safe, efficient and sufficient.
- 8       **Q.     DO YOU AGREE WITH MS. DISMUKES' IMPUTATION OF TEST**  
9       **YEAR REVENUES FOR ALLEGED EFFLUENT SALES AT THE**  
10       **DELTONA LAKES SYSTEM?**
- 11      A.     Yes, however, Ms. Dismukes is not correct when alleging that the  
12      effluent sales occurred and revenues were received by the Company  
13      in 1991. Due to permitting and other operating constraints, no  
14      revenue was received for effluent sales from the Deltona Lakes  
15      wastewater system in 1991. We agree with the adjustment, however,  
16      as an out of period adjustment reflecting known and measurable  
17      revenues beyond the test year since the effluent sales contract  
18      establishes the effluent rate and requires a minimum amount of  
19      effluent to be purchased by the user.
- 20      **Q.     DOES THAT CONCLUDE YOUR TESTIMONY?**
- 21      A.     Yes, it does.

EXHIBIT \_\_\_\_ (CLS-3)  
Cover Page

BRENDA BALL (DER) CORRESPONDENCE TO BOB WILLIAMS,  
CITRUS SPRINGS SYSTEM



# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

June 16, 1992

Bob Williams  
Southern States Utilities  
9840 N. Citrus Springs Blvd.  
Citrus Springs, FL 32630

RE: Citrus Springs Lead and Copper Sampling  
Plan/Materials Survey

Dear Mr. Williams:

This acknowledges receipt of the above referenced information. Upon review of the information, the Department has found your plan deficient in the following area(s).

1. No records review checklist provided. (copy enclosed)
2. No materials survey provided.
3. No page numbers on report.
4. No map indicating exact locations of lead and copper tap sampling sites.

Please correct the item(s) noted above within 30 days of this notice.

If you have any questions, please contact me at (813) 620-6100 extension 318.

Sincerely,

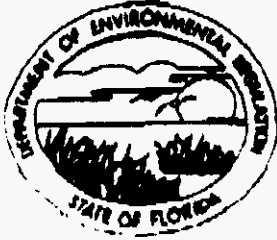
Brenda Ball  
Environmental Specialist I  
Drinking Water Section

BB/sem

Enclosure:

cc: Dawn Durham, Citrus CPHU  
Mel Fisher





# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Park Boulevard • Tampa, Florida 33610-7917  
Lawton Chiles, Governor • 813-630-6100 • Carol M. Browner, Secretary

October 20, 1992

Bob Williams  
Post Office Box 217  
Dunnellon, FL 32630

RE: Lead and Copper Tap Sampling Plan  
Citrus Springs  
PWS-ID # 6090312  
Citrus County

Dear Bob:

The Department has reviewed the Lead and Copper Tap Sampling Plan together with, the supporting materials survey and records review. We find the plan to be sufficient to meet minimum requirements.

Please continue your efforts of compliance with the Lead and Copper Rule by submitting all analysis results required to the Department, no later than January 15, 1993.

If you have any questions, please contact me at (813) 744-6100 extension 318.

Sincerely,

  
Brenda Ball  
Environmental Specialist I  
Drinking Water Section

BB/sam

cc: Citrus CPHU

MR. MAHER (DER)  
CORRESPONDENCE  
SILVER LAKE OAKS SYSTEM



# Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 18, 1992

Mr. Bert Phillips  
Southern States Utilities  
1000 Color Place  
Apopka, FL 32703

Docket No. 920199-WS  
Charles L. Sweat Exhibit No. 4  
Exhibit \_\_\_\_\_ (CLS-4)  
Page 1 of 1

Dear Mr. Phillips:

SSS ENGINEERING

Putnam County - PW  
Silver Lake Oaks WTP  
PWS ID: 2544258

On May 27, 1992, a reinspection was done of the referenced community public water system. No deficiencies were noted. Recent chemical recheck analyses have cleared the Manganese and Iron MCLs. This system currently meets or exceeds State and Federal drinking water standards.

Because the rechecks were erratic, additional iron tests have been requested. We'll have to keep an eye on the iron levels. With the current chemical rechecks, we can at this time formally clear the project under separate correspondence.

If you have any questions, I can be reached at (904) 448-4330, extension 305. Your past cooperation with Florida's Safe Drinking Water Program is appreciated.

Sincerely,

*James R. Maher*  
James R. Maher  
Engineer IV

JRM  
BRL

cc: Paul Thompson  
Joe Roberts  
Robert Regalado  
Putnam County Health Department

Administration 448-4300  
Air 448-4310  
Waste Management 448-4320



Water Facilities 448-4330  
Water Management 448-4340  
FAX 448-4366

@ 6/22

Exhibit \_\_\_\_\_ (CLS-5)  
Cover Page

BRUCE PASTER (SSU) CORRESPONDENCE WITH DONALD WHITE (DER,  
FISHERMAN'S HAVEN AND LEILANI HEIGHTS SYSTEMS



**RECEIVED**

October 20, 1992

VIA FEDERAL EXPRESS  
 AIR BILL #4597985405

OCT 21 1992

Mr. Donald B. White  
 Florida Dept. of Environmental Regulation  
 Southeast District  
 1900 South Congress Avenue  
 Suite A  
 West Palm Beach, FL 33406

**ENVIRONMENTAL  
 SERVICES**

Re: PWS ID #4430442  
 Fisherman's Haven - Martin County Public Water System

Dear Mr. White:

This letter is in response to your Notice of Noncompliance dated September 22, 1992, to Rafael A. Terrero, SSU, regarding the referenced system. The following information is provided concerning the noted deficiencies:

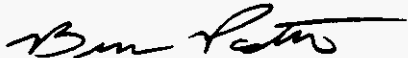
1	WELL CONSTRUCTION - INTRUSION OF SURFACE WATER	A concrete pad 6' x 6' x 4" will be poured to prevent possible surface water intrusion.
2	LACK OF APPROPRIATE PUMP/PIPE APPURTENANCES	An additional pressure gauge was installed on October 9, 1992, to indicate well pump discharge pressure.
3	LEAKING CHECK VALVE	The check valve has been repaired. The hinge pin and O-rings have been replaced and there are no leaks.
4	INADEQUATE DISINFECTANT TIME	The actual chlorine contact time from point of application to the first served lot is approximately 48 minutes. This is adequate disinfection time. The distribution system has consistently met chlorine residual and bacteriological level tests.
5	LACK OF METER BYPASS	In the event of a meter malfunction, the meter can be totally replaced within 10 minutes. During the majority of a typical day, the well pump only runs for a few minutes each hour to maintain adequate distribution system pressure. The meter can easily be replaced during the "off" cycle.
6	LACK OF ADEQUATE AUXILIARY POWER	In July, 1992, a "census" was performed with a mail-out to our customers at Fisherman's Haven. Attached is a sample letter from which we received 85 responses. Our Customer Service Department then attempted to contact, by telephone, the remaining customers from which an additional 17 responses were obtained. Attached is a summary which shows 102 responses out of our 133 potable water connections. The average of 2.28 people per connection calculates out to a total of 303 persons served by the Fisherman's Haven Water System. The lower-than-average population density is due to the fact that all 133 units are half duplexes. The units are small, and most are inhabited by only one or two persons. Therefore, we do not serve 350 or more persons at Fisherman's Haven.

7	WELL CONSTRUCTION UNKNOWN	We have no information in our files regarding the well. The well appears to be a 4" diameter well with a submersible pump which pumps at a rate of 110 gallons per minute. I have spoken with Mel Fisher, SSU, who does not believe that any information on the well was ever received when SSU took over this system. The Martin County Public Health Unit does not have any information on the well, and the South Florida Water Management District does not require a Consumptive Use Permit.
8	INADEQUATE NUMBER OF WELLS	Only one well is required since this system does not serve 350 or more persons. See Item 6 above.
9	NO PERMIT ON FILE FOR WATER PLANT	We do not believe that copies of any construction permits or any other permits were ever received when SSU took over this system. We will continue to look for permits and other construction information which will be forwarded to you upon discovery.
10	NO PERMIT FOR LOSS OF CHLORINE ALARM	I spoke with Mel Fisher, SSU, who indicated that he was informed that a permit was not required by your District in 1990 to install a loss of chlorination alarm. Seeing how this appears to be a new requirement or a different interpretation of an existing requirement, would you please clarify which requirement this falls under and better define for us what modifications or alterations to a treatment system would require a construction permit in the future.
11	LACK OF METERING DEVICE	The meter at Fisherman's Haven accurately indicates pumpage of finished water. Please note Item 5 above.

Please contact me if we can be of further assistant. Thank you for your cooperation in working with us to correct these concerns.

Sincerely,

SOUTHERN STATES UTILITIES, INC.



Bruce Paster, P.E.  
Senior Project Engineer

BP:vs  
Attachments

c: Deborah Oblacznski, FDER  
Ray Cross, Martin County Public Health Unit  
Mel Fisher, SSU  
Jim Ragsdale, SSU  
Rafael Terrero, SSU



LEILANI

**ENVIRONMENTAL  
SERVICES**

October 20, 1992

**VIA FEDERAL EXPRESS  
AIR BILL #4597985405**

Mr. Donald B. White  
Florida Dept. of Environmental Regulation  
Southeast District  
1900 South Congress Avenue  
Suite A  
West Palm Beach, FL 33406

**Re: PWS ID #4430790-02  
Leilani Heights Plant #2  
Martin County Public Water System**

Dear Mr. White:

This letter is in response to your Notice of Noncompliance dated September 17, 1992, to Rafael Terrero, SSU, regarding the referenced system. The following information is provided concerning the noted deficiencies:

1	<b>LACK OF PRESSURE GAUGE</b>	An additional pressure gauge was installed on October 9, 1992, to indicate pump discharge pressure.
2	<b>INADEQUATE DISINFECTANT TIME</b>	The actual chlorine contact time from point of application to the first served lot is approximately 26 minutes. This is adequate disinfection time for the Leilani Heights Water Treatment and Distribution System as it has consistently met chlorine residual, bacteriological level tests as well as other DER required water quality parameters. We believe this well will continue to provide quality potable water to our customers.
3	<b>INADEQUATE AUXILIARY POWER</b>	We are presently determining the best method for meeting the requirements of providing water during an electrical power failure. The possibility of interconnecting with the Martin County Distribution System is being examined as well as the possibility of purchasing/installing a diesel emergency generator. Funds have been requested to accomplish this project in the SSU 1993 Capital Budget.
4	<b>WELL CONSTRUCTION UNKNOWN</b>	Attached is a copy of the South Florida Water Management District Water Use Permit Number 43-00070-W, which contains some basic information regarding the wells at Leilani Heights. We have not been successful in obtaining additional information on the wells from the developer or the Martin County Public Health Unit.

Mr. Donald B. White

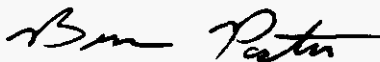
October 20, 1992

5	NO PERMIT FOR LOSS OF CHLORINE ALARM	I spoke with Mel Fisher, SSU, who indicated that he was informed that a permit was not required by your District in 1990 to install a loss of chlorination alarm. Seeing how this appears to be a new requirement or a different interpretation of an existing requirement, would you please clarify which requirement this falls under and better define for us what modifications or alterations to a treatment system would require a construction permit in the future.
6	LACK OF METERING DEVICE	The meter at Plant #2 accurately indicates pumpage of finished water from Plant #2. Any maintenance/replacement of the meter can be accomplished without loss of system pressure because Plant #1 is connected to the same distribution system and can maintain adequate pressure by itself.

Please contact me if you need any additional information on this water system. Thank you for your cooperation in working with us to correct these concerns.

Sincerely,

SOUTHERN STATES UTILITIES, INC.



Bruce Paster, P.E.  
Senior Project Engineer

BP:vs  
Attachments

c: Deborah Oblacznski, FDER  
Ray Cross, Martin County Public Health Unit  
Mel Fisher, SSU  
Sam Sparks  
Rafael Terrero, SSU





**General Offices**

1000 Color Place  
Apopka, FL 32703  
(407) 880-0058

LEILANI HT)

**RECEIVED**

OCT 21 1992

**ENVIRONMENTAL  
SERVICES**

October 20, 1992

**VIA FEDERAL EXPRESS  
AIR BILL #4597985405**

Mr. Donald B. White  
Florida Dept. of Environmental Regulation  
Southeast District  
1900 South Congress Avenue  
Suite A  
West Palm Beach, FL 33406

Re: PWS ID #4430790-01  
Leilani Heights Plant #1  
Martin County Public Water System

Dear Mr. White:

This letter is in response to your Notice of Noncompliance dated September 17, 1992, to Rafael Terrero, SSU, regarding the referenced system. The following information is provided concerning the noted deficiencies:

1	LACK OF PRESSURE GAUGE	An additional pressure gauge was installed on October 9, 1992, to indicate pump discharge pressure.
2	INADEQUATE DISINFECTANT TIME	The actual chlorine contact time from point of application to the first served lot is approximately 22 minutes. This is adequate disinfection time for the Leilani Heights Water Treatment and Distribution System as it has consistently met chlorine residual, bacteriological level tests as well as other DER required water quality parameters. We believe this well will continue to provide quality potable water to our customers.
3	INADEQUATE AUXILIARY POWER	We are presently determining the best method for meeting the requirements of providing water during an electrical power failure. The possibility of interconnecting with the Martin County Distribution System is being examined as well as the possibility of purchasing/installing a diesel emergency generator. Funds have been requested to accomplish this project in the SSU 1993 Capital Budget.
4	WELL CONSTRUCTION UNKNOWN	Attached is a copy of the South Florida Water Management District Water Use Permit Number 43-00070-W, which contains some basic information regarding the wells at Leilani Heights. We have not been successful in obtaining additional information on the wells from the developer or the Martin County Public Health Unit.

Mr. Donald B. White

2


October 20, 1992

5	NO PERMIT FOR LOSS OF CHLORINE ALARM	I spoke with Mel Fisher, SSU, who indicated that he was informed that a permit was not required by your District in 1990 to install a loss of chlorination alarm. Seeing how this appears to be a new requirement or a different interpretation of an existing requirement, would you please clarify which requirement this falls under and better define for us what modifications or alterations to a treatment system would require a construction permit in the future.
6	LACK OF METERING DEVICE	The meter at Plant #1 accurately indicates pumpage of finished water from Plant #1. Any maintenance/replacement of the meter can be accomplished without loss of system pressure because Plant #2 is connected to the same distribution system and can maintain adequate pressure by itself.

Please contact me if you need any additional information on this water system. Thank you for your cooperation in working with us to correct these concerns.

Sincerely,

SOUTHERN STATES UTILITIES, INC.



Bruce Paster, P.E.  
Senior Project Engineer

BP:vs  
Attachments

c: Deborah Oblacznski, FDER  
Ray Cross, Martin County Public Health Unit  
Mel Fisher, SSU  
Sam Sparks  
Rafael Terrero, SSU

JOHN LEVESQUE (SSU), November 19, 1991  
CORRESPONDENCE WITH DAVID MacCOLEMAN (DER)  
SUGARMILL WOODS SYSTEM



**Sugar Mill Woods Office**  
7177 W. International Court No. 6  
Homosassa, FL 32646  
(904) 382-4441

November 19, 1991

Department of Environmental Regulation  
4520 Oak Fair Blvd.  
Tampa, FL 33610-7347

ATTN: Mr. David MacColeman, Environmental Specialist  
Domestic Waste

RE: Letter from David Rhodes regarding  
Ground Water Monitoring at Sugarmill Woods  
Permit #0009-158879

Dear Mr. MacColeman,

Regarding my conversation with Mr. Rhodes, I am forwarding this letter to outline the steps to rectify our compliance situation at Sugarmill Woods.

1. We have appointed different personnel to oversee the monitoring well sampling process at Sugarmill Woods.
2. We have installed a yearly planner in our lab at the Wastewater Treatment Plant. This is marked with ordering dates for sample kits and also dates of when to take samples. This will tell us exactly when samples should be taken.
3. Our sample kits will be ordered the first week of each quarter and wells will be sampled when received. (Kits take approximately three days to arrive after ordering) Taking samples this early will allow us time for any unforeseen rechecks to be taken and analyzed long before the due date.
4. Currently we are using a portable submersible pump to pull samples from the wells. When dropping the tight fitting pump into the wells, it scrapes the sides causing small rust particles to drop down and clog the pump. This causes considerable down time. I have requested a permanent bladder type pump for each well and will be able to order in January, 1992. These permanent pumps will save down time plus eliminate the possibility of bacteria in samples caused by too much handling.



Docket No. 920199-WS  
Charles L. Sweat Exhibit No. 6  
Exhibit \_\_\_\_\_ (CLS-6)  
Page 2 of 2

**Sugar Mill Woods Office**  
7177 W. International Court No. 2  
Homosassa, FL 32348  
(904) 382-4447

Mr. MacColeman, when I received the letter from David Rhodes on November 14th, I checked our files and the kits were received August 7, 1991, the same time our sludge kits were received. The operator took sludge samples to the lab on August 9, 1991 and should have taken the monitoring well samples also, but failed to do so. This person will no longer be responsible for the supervision of the collection of monitoring well samples.

In closing, these third quarter samples are being taken in the fourth quarter, November 18. I would like your input as to when the fourth quarter samples should be taken.

Thank you for your patience, while we work on this situation.

Sincerely, *John Levesque*

John Levesque, Area Supervisor  
Sugarmill Woods  
SSU SERVICES

JL/jb

cc: David Rhodes, DER  
Bill Williams, Spring Hill  
Frank Sanderson, Apopka  
File

MELVIN FISHER (SSU), April 29, 1992  
CORRESPONDENCE WITH DAVID G. MacCOLEMAN (DER)  
SUGARMILL WOODS INSPECTION



**SSU**

April 29, 1992

David G. MacColeman  
Florida Department of Environmental Regulation  
Southwest District  
4520 Oak Fair Boulevard  
Tampa, FL 33610-7347

Re: Sugar Mill Woods Inspection

Dear Mr. MacColeman:

This letter is written in response to your letter dated 4/9/92 to Charles Sweat regarding the inspection of the Sugar Mill Woods wastewater treatment facility. The following items were noted in your report:

Flow Measurement

1. Sprayheads must be maintained or replaced. I have spoken with John Levesque, supervisor at Sugar Mill Woods, who has planned to repair any damaged sprayheads by May 29, 1992.

Disposal Methods

1. The use of the drying beds has been discontinued. They will not be used again until an underdrain system is installed to return the liquid filtrate back to the treatment plant.
2. Regarding the sludge kept temporarily on-site, John Levesque has made arrangements to haul the stabilized dried sludge to the Citrus County landfill. This is expected to be accomplished by May 15, 1992. The drying beds have already been cleaned.

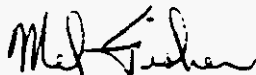
3. I have spoken with Tom Seager, our plant operator at Sugar Mill Woods, to obtain information regarding the operation of the digester. The capacity of the digester is 39,000 gallons per calculations based on quantities of sludge hauled by AAA White Company. Tom has indicated to me that we have approximately 14 days detention time based on current sludge handling practices at the plant. Sludge is stabilized with lime to a pH of 12 for 2 hours prior to hauling from the digester. To ensure adequate pH stabilization, the lab pH meter is going to be repaired or replaced by May 29, 1992.

Additional digester capacity has been planned in the expansion of this sewage treatment plant through DER Construction Permit #DC 09-188699. "10 States Standards" are expected to be met when the expansion is complete.

4. Plant personnel have been reminded of the importance of notifying the DER regarding all abnormal events which may interfere with the function of the facility. A copy of the Southern States Utilities reporting procedures is attached for your information. It is my understanding that a report was made on the oxidation ditch north rotor taken out of service temporarily for repairs. However, a report had not been made on a small spill of raw sewage (approximately 100 gallons) at the head of the plant on March 9, 1992. The spill area was appropriately cleaned and disinfected with HTH.

Please contact me if you need any additional information on the above items. We appreciate the opportunity to work with you in correcting any concerns at the Sugar Mill Woods plant.

Sincerely,



Melvin E. Fisher  
Environmental Compliance Administrator

d1h/92L83

Enclosures



bcc: Charles Sweat  
Karla Olson Teasley  
Chuck Wood  
Bill Williams  
John Levesque  
Tom Seager  
Ralph Terrero  
Joe Mack  
Frank Sanderson

## **EMERGENCY REPORTING PROCEDURE**

**RULE: D.E.R. rules 17-602.360 and 17.600.750 state a "Report must be made to the Department or the local approved regulatory Agency by wire or telephone when any plant breakdown or condition causes or is likely to cause interruption of service, inefficient or unsafe treatment plant operation, or discharge of water or wastewater in a manner not authorized by the permit, as soon as possible, but no later than within 24 hours following this occurrence or condition".**

## **EMERGENCY REPORTING PROCEDURE**

**The following notification Procedure will be followed by all SSU Services operating personnel. Per operating permit, report any non-compliance item of the treatment facility to D.E.R. within 24 hours.**

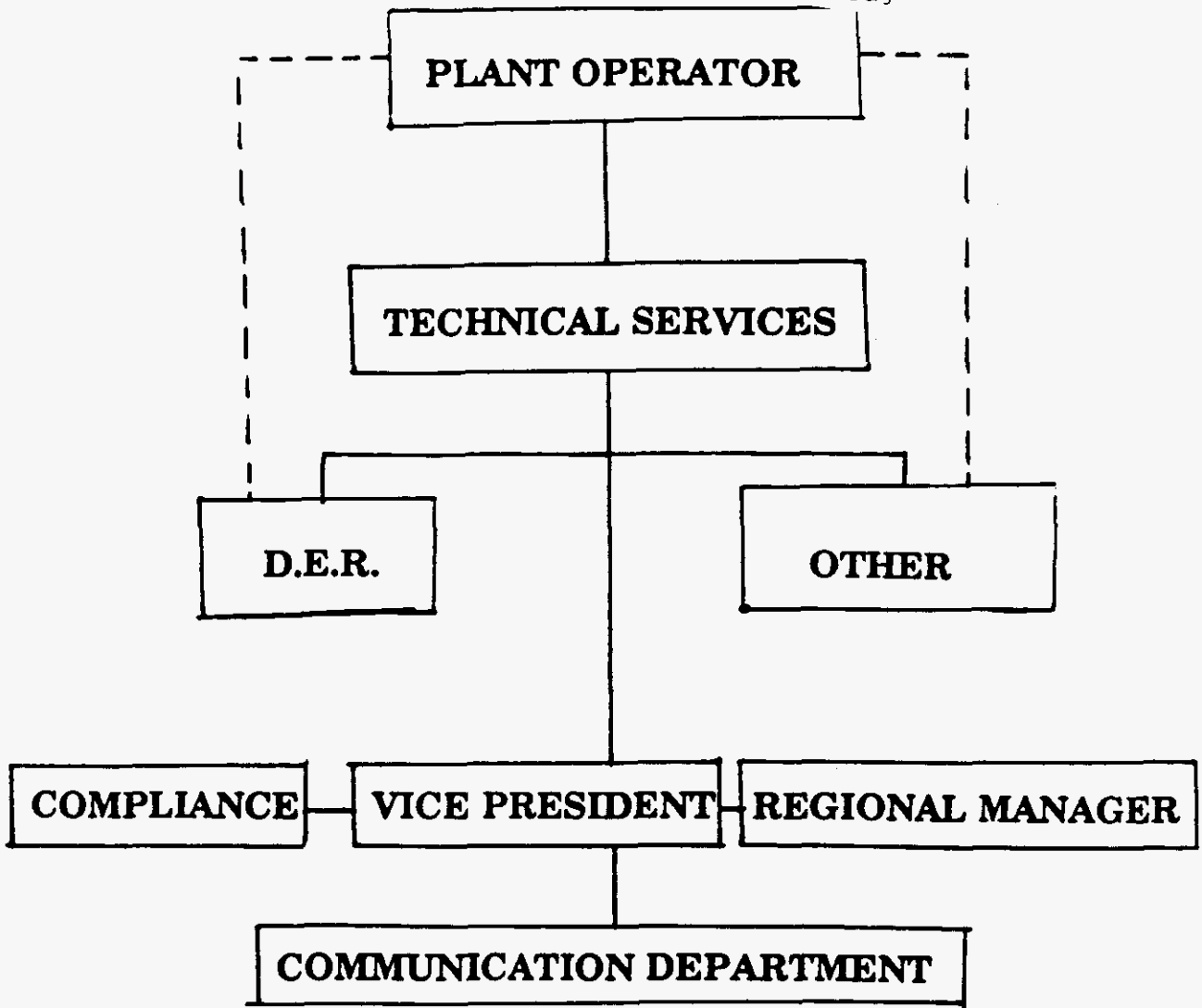
**Listed below are the reporting contacts in prioritized order.**

### **Reporting Contacts**

- 1) Technical Services - Frank Sanderson**
- 2) Region Manager/Supervisor**  
**North Region - Joe Roberts**  
**South Region - Dave Denny**  
**West Region - Bill Williams**  
**Central Region - Charles Sweat**
- 3) Vice President Operations - Charles Sweat**
- 4) Should the contacts listed above not be available, the operator will report any malfunction condition to D.E.R. or the local approved regulatory agency within 24 hours of malfunction.**
- 5) Compliance Audit - Mel Fisher**
- 6) Communications Department - Kerry Crooks (for necessary media information).**

## **FOLLOW UP PROCEDURE**

**Rule 17-600.750(2) states, "A written report will be required by the appropriate district office or local program within 72 hours of the notification of malfunction. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its recurrence, and the time when the water or wastewater facility is expected to be properly operating". This written report will be prepared by Technical Services.**



IN THE EVENT TECHNICAL SERVICES CANNOT BE CONTACTED, THE OPERATOR WILL REPORT ANY MALFUNCTION CONDITION TO D.E.R. OR THE LOCAL APPROVED REGULATORY AGENCY WITHIN 24 HOURS OF MALFUNCTION. THE OPERATOR IS STILL RESPONSIBLE FOR REPORTING THE MALFUNCTION TO TECHNICAL SERVICES AT THE FIRST AVAILABLE OPPORTUNITY.

Docket No. 920199-W5  
 Charles L. Sweat Exhibit No.  
 Exhibit (CIS-7)  
 Page 8 of 9

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From (Your Name) Please Print <b>Malvin E. Fisher, Env.Comp.Admin.</b>		Your Phone Number (Very Important) <b>(407-880-0055)</b>
Company <b>SOUTHERN STATE UTILITIES INC</b>		Department/Floor No.
Street Address <b>1000 COLOR PLACE</b>		
City <b>APOPKA</b>	State <b>FL</b>	ZIP Required <b>32703</b>
To (Recipient's Name) Please Print <b>David G. MacColeman</b>		Recipient's Phone Number (Very Important)
Company <b>FDER Southwest District</b>		Department/Floor No.
Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes) <b>4520 Oak Fair Boulevard</b>		
City <b>Tampa</b>	State <b>FL</b>	ZIP Required <b>33610-7347</b>
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice) <b>Super Mill Waste Inspection</b>		
IF HOLD FOR PICK-UP, Print FEDEX Address Here		
Street Address		
City	State	ZIP Required
PAYMENT 1 <input checked="" type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card		
5 <input type="checkbox"/> Cash 6 <input type="checkbox"/> Check 7 <input type="checkbox"/> Acct./Credit Card No. 8 <input type="checkbox"/> Exp. Date		
SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 18 <input checked="" type="checkbox"/> FEDEX LETTER 12 <input type="checkbox"/> FEDEX PAK * 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY Standard Overnight (Delivery by next business afternoon) 51 <input type="checkbox"/> YOUR PACKAGING 58 <input type="checkbox"/> FEDEX LETTER * 52 <input type="checkbox"/> FEDEX PAK * 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE Government Overnight (Priority to selected addressee) 48 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE Freight Service (No Extra Charge on any package over 150 lbs.) 70 <input type="checkbox"/> OVERNIGHT FREIGHT ** 60 <input type="checkbox"/> TWO-DAY FREIGHT **	1 <input type="checkbox"/> HOLD FOR PICK-UP (It is on Box 14) 2 <input type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (It is a charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (It is a charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE (Use) 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (It is a charge)	WEIGHT in Pounds (lb) YOUR DECLARED VALUE (Max \$500) Total Total Total DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> Lb <b>L x W x H =</b> Received At 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 5 <input type="checkbox"/> Station 4 <input type="checkbox"/> BSC
SERVICE CONDITIONS, DECLARED VALUE AND LIMIT OF LIABILITY Use of this service constitutes your agreement to the terms and conditions printed on the reverse of this bill. The undersigned hereby certifies that the contents of this bill are true and correct. We will not be responsible for any claims in excess of \$500 per package unless the sender provides a higher value. An additional charge and the sender pays at least \$500 per package. The sender's liability for any loss or damage to the contents of this bill is limited to the actual value of the contents. The maximum liability for any loss or damage to the contents of this bill is limited to the actual value of the contents. The maximum liability for any loss or damage to the contents of this bill is limited to the actual value of the contents. The maximum liability for any loss or damage to the contents of this bill is limited to the actual value of the contents.		Federal Express Use Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 6/91 PART #137204 FXEM 1281 FORMAT #088 <b>099</b> © 1990-91 FEDEX PRINTED IN U.S.A.
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## **A NOTICE TO OUR CUSTOMERS REGARDING BACKFLOW PREVENTION**

Dear Customer:

In accordance with the Florida Department of Environmental Regulation Rule 17-555.350, Southern States Utilities, Inc. is required to develop and implement a cross-connection/backflow prevention program.

A Cross-Connection is defined in the rules of the Department of Environmental Regulation (DER), of the State of Florida, 17-555.360 as "Any physical arrangement whereby a public water supply is connected, directly or indirectly with any other water supply system, sewer, drain, conduit, pool, storage reservoir, plumbing fixture, or other device which contains or may contain contaminated water, sewage or other waste or liquid of unknown or unsafe quality which may be capable of imparting contamination to the public water supply as the result of backflow. Bypass arrangements, jumper connection, removable sections, swivel or changeable devices and other temporary or permanent devices through which or because of which backflow could occur are considered to be cross connections." Consequently, either cross-connections or the change of backflow must be eliminated to prevent degrading the high quality of water that water purveyors strive to maintain.

The Cross-Connection/Backflow Prevention Policy is available for your review at your nearest customer service office or upon request from SSU customer service, 1000 Color Place, Apopka, FL 32703.

In the near future, Southern States Utilities personnel will be conducting field surveys of all metered water services and water distribution systems to determine what if any cross-connection/backflow prevention deficiencies exist.

Upon the completion of these surveys, those residences and businesses with existing and/or potential cross-connection or backflow problems will be notified by mail or handout of the corrective action required to come into compliance with the Backflow Prevention Policy.

Sincerely yours,

Southern States Utilities, Inc.