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DOCKET NO.: 950495-WS - [Southern States Utilities, Inc. - Amelia Island Wastewater System, Beacon Hills Wastewater System, Woodmere Wastewater System, Beecher's Point Wastewater System, Interlachen Lakes Estates/Park Manor Wastewater System, Palm Port Wastewater System, Silver Lake Oaks Wastewater System]

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

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FPSC-RECORDS/REPORTING

1 DIRECT TESTIMONY OF KRISTEN SMELTZER

2 Q. Please state your name and business address.

3 A. Kristen Smeltzer, 7825 Bay Meadows Way, Suite 200B, Jacksonville,
4 Florida 32256-7590.

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

7 A. I have a Civil Engineering degree and am a Professional Engineer,
8 license number 0046706.

9 Q. By whom are you presently employed?

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

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

13 A. I have worked for the Department for 7 years as an engineer in both the
14 Drinking Water Section (4 years) and the Domestic Waste Section (3 years).

15 Q. What are your general responsibilities at the FDEP?

16 A. Presently, I am the compliance and enforcement supervisor for the
17 Domestic Waste Section. I supervise 5 employees and make the CSE decisions
18 for the section.

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

21 A. Yes.

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

23 A. Yes.

24 Amelia Island Wastewater System

25 Q. Does the utility have current operating or construction permits from the

1 FDEP for Amelia Island Wastewater System (Amelia Island)?

2 A. Yes.

3 Q. Please state the issuance dates and the expiration dates of the
4 operating or construction permits.

5 A. They are: DC4S-260421, to modify plant, issued April 24, 1995 which
6 expires April 24, 1997, and D045-224076, for the operating permit, issued July
7 7, 1993, which expires July 7, 1998.

8 Q. Are the plants in compliance with FDEP issued permits?

9 A. Yes.

10 Q. Are the wastewater collection, treatment and disposal facilities
11 adequate to serve present customers based on permitted capacity?

12 A. No. The plant is running at capacity. Permit DC4S-260421 raises
13 capacity from .850 to .950 MGD.

14 Q. Are the treatment and disposal facilities located in accordance with
15 Rule 62-600, Florida Administrative Code?

16 A. Yes.

17 Q. Has the FDEP required the utility to take any action so as to minimize
18 possible adverse effects resulting from odors, noise, aerosol drift or
19 lighting?

20 A. No.

21 Q. Do the pump stations and lift stations meet FDEP requirements with
22 respect to location, reliability and safety?

23 A. Yes.

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

1 | A. Yes.

2 | Q. Is the overall maintenance of the treatment, collection, and disposal
3 | facilities satisfactory?

4 | A. Yes.

5 | Q. Does the facility meet the effluent disposal requirements of Rules
6 | 62-600 and 62-610, Florida Administrative Code?

7 | A. Yes.

8 | Q. Are the collection, treatment and disposal facilities in compliance with
9 | all the other provisions of Chapter 62, Florida Administrative Code, not
10 | previously mentioned?

11 | A. Yes.

12 | Q. Has Amelia Island wastewater system been the subject of any FDEP
13 | enforcement action within the past two years?

14 | A. No.

15 | Q. Do you have anything further to add regarding the Amelia Island plant?

16 | A. This year the excessive rain caused problems. The golf course did not
17 | need the effluent and the storage pond overflowed. If these problems persist,
18 | our Department would want the utility to construct a wet weather discharge.
19 | This issue was raised during last permit review. Also, the utility should
20 | have an Inflow/Infiltration (I/I) program. The Department is unaware of any
21 | efforts on the utility's part to track flow vs. rain or track run times of
22 | lift station pumps vs. rain to determine if there is a significant problem.
23 | In addition, we do not know if they actively smoke test or TV portions of
24 | their lines and make repairs as necessary. The question has not been raised
25 | during permit review or inspections. The utility did not address I/I in their

1 Capacity Analyses Report.

2 Beacon Hills Wastewater System

3 Q. Does the utility have current operating or construction permits from the
4 FDEP for Beacon Hills Wastewater System (Beacon Hills)?

5 A. Yes.

6 Q. Please state the issuance dates and the expiration dates of the
7 operating or construction permits.

8 A. Permit DO 16-213087 was issued March 25, 1993 and will expire on June
9 10, 1997. The state operating permit was merged with the National Pollutant
10 Discharge Elimination System (NPDES) permit on May 1, 1995 and set to expire
11 at the earliest date. The NPDES permit expired July 31, 1995. The utility
12 applied to the Environmental Protection Agency (EPA) for a new permit. On May
13 1, 1995, its application was transferred to our Department for processing.
14 The application is currently under review. The previous permit has been
15 extended administratively until the new permit is issued.

16 Q. Are the plants in compliance with FDEP issued permits?

17 A. Yes.

18 Q. Are the wastewater collection, treatment and disposal facilities
19 adequate to serve present customers based on permitted capacity?

20 A. Yes.

21 Q. Are the treatment and disposal facilities located in accordance with
22 Rule 62-600, Florida Administrative Code?

23 A. Yes.

24 Q. Has the FDEP required the utility to take any action so as to minimize
25 possible adverse effects resulting from odors, noise, aerosol drift or

1 | lighting?

2 | A. No.

3 | Q. Do the pump stations and lift stations meet FDEP requirements with
4 | respect to location, reliability and safety?

5 | A. Yes.

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

8 | A. Yes.

9 | Q. Is the overall maintenance of the treatment, collection, and disposal
10 | facilities satisfactory?

11 | A. Yes.

12 | Q. Does the facility meet the effluent disposal requirements of Rules
13 | 62-600 and 62-610, Florida Administrative Code?

14 | A. Yes.

15 | Q. Are the collection, treatment and disposal facilities in compliance with
16 | all the other provisions of Chapter 62, Florida Administrative Code, not
17 | previously mentioned?

18 | A. Yes.

19 | Q. Has Beacon Hills wastewater system been the subject of any FDEP
20 | enforcement action within the past two years?

21 | A. No.

22 | Q. Do you have anything further to add regarding the Beacon Hills system?

23 | A. We are presently waiting on additional information to process the permit
24 | application including the capacity analyses report. Once we review this
25 | information we may have questions about their efforts to control

1 | infiltration/inflow problems. The Department's policy is to reduce as much
2 | effluent discharging to surface water as possible by requiring the utility to
3 | write a reuse feasibility report. When feasible, the utility should move
4 | their effluent discharge to a land application site.

5 | Woodmere Wastewater System

6 | Q. Does the utility have current operating or construction permits from the
7 | FDEP for Woodmere Wastewater System (Woodmere)?

8 | A. Yes.

9 | Q. Please state the issuance dates and the expiration dates of the
10 | operating or construction permits.

11 | A. The system's operating permit is DO 16-194530, issued August 6, 1991
12 | which will expire April 30, 1996. On May 1, 1995, this was merged with the
13 | NPDES permit FL0026786 which expired September 30, 1995. The merged permit
14 | expires on the earliest date. The utility company had applied to EPA for a
15 | permit renewal. That application was transferred to the state for processing.
16 | The old permit has been administratively extended until a new permit is
17 | issued.

18 | Q. Are the plants in compliance with FDEP issued permits?

19 | A. Yes.

20 | Q. Are the wastewater collection, treatment and disposal facilities
21 | adequate to serve present customers based on permitted capacity?

22 | A. Yes. The utility has a tie-in with the University of West Florida's
23 | Monterey Plant. It is difficult to determine how much flow if any is being
24 | sent to Monterey each month. The flows to the plant are above or at 80%
25 | capacity.

1 Q. Are the treatment and disposal facilities located in accordance with
2 Rule 62-600, Florida Administrative Code?
3 A. Yes.
4 Q. Has the FDEP required the utility to take any action so as to minimize
5 possible adverse effects resulting from odors, noise, aerosol drift or
6 lighting?
7 A. No.
8 Q. Do the pump stations and lift stations meet FDEP requirements with
9 respect to location, reliability and safety?
10 A. Yes.
11 Q. Does the utility have certified operators as required by Rule 61E12-41,
12 Florida Administrative Code?
13 A. Yes.
14 Q. Is the overall maintenance of the treatment, collection, and disposal
15 facilities satisfactory?
16 A. Yes.
17 Q. Does the facility meet the effluent disposal requirements of Rules
18 62-600 and 62-610, Florida Administrative Code?
19 A. Yes.
20 Q. Are the collection, treatment and disposal facilities in compliance with
21 all the other provisions of Chapter 62, Florida Administrative Code, not
22 previously mentioned?
23 A. Yes.
24 Q. Has Woodmere wastewater system been the subject of any FDEP enforcement
25 action within the past two years?

1 A. No.

2 Q. Do you have anything further to add regarding this system?

3 A. The physical plant is old and may be beyond its design life. The entire
4 plant either needs an overhaul or should be replaced. We do not have any
5 information as to if the facility has an Inflow/Infiltration program or
6 problem. As stated above, the Department's policy is to reduce as much
7 effluent discharging to surface water as possible by requiring the utility to
8 write a reuse feasibility report. When feasible, their effluent discharge
9 should move to a land application site or reuse site.

10 Beecher's Point Wastewater System

11 Q. Does the utility have current operating or construction permits from the
12 FDEP for Beecher's Point Wastewater System (Beecher's Point)?

13 A. Yes.

14 Q. Please state the issuance dates and the expiration dates of the
15 operating or construction permits.

16 A. Permit No. FLA017732 (D054-230629) was issued June 24, 1993 and expires
17 June 24, 1998.

18 Q. Are the plants in compliance with FDEP issued permits?

19 A. Yes.

20 Q. Are the wastewater collection, treatment and disposal facilities
21 adequate to serve present customers based on permitted capacity?

22 A. No. The effluent disposal site (perc ponds) are not able to handle the
23 effluent discharge and are failing. Until just recently the pond water was
24 being hauled to Welaka in order to prevent them from discharging. The utility
25 has had a report prepared to find a new discharge location.

1 Q. Are the treatment and disposal facilities located in accordance with
2 Rule 62-600, Florida Administrative Code?
3 A. Yes.
4 Q. Has the FDEP required the utility to take any action so as to minimize
5 possible adverse effects resulting from odors, noise, aerosol drift or
6 lighting?
7 A. No.
8 Q. Do the pump stations and lift stations meet FDEP requirements with
9 respect to location, reliability and safety?
10 A. Yes.
11 Q. Does the utility have certified operators as required by Rule 61E12-41,
12 Florida Administrative Code?
13 A. Yes.
14 Q. Is the overall maintenance of the treatment, collection, and disposal
15 facilities satisfactory?
16 A. Yes.
17 Q. Does the facility meet the effluent disposal requirements of Rules
18 62-600 and 62-610, Florida Administrative Code?
19 A. Yes. Except for the fact that the ponds are failing.
20 Q. Are the collection, treatment and disposal facilities in compliance with
21 all the other provisions of Chapter 62, Florida Administrative Code, not
22 previously mentioned?
23 A. Yes.
24 Q. Has Beecher's Point wastewater system been the subject of any FDEP
25 enforcement action within the past two years?

1 A. No.

2 Q. What is the status of the utility's disposal problems?

3 A. Welaka is near-by and could treat Beecher Point's sewage. The permit
4 was recently modified to allow the addition of a larger digester. The
5 construction hasn't been completed yet.

6 Interlachen Lakes Estates/Park Manor Wastewater System

7 Q. Does the utility have current operating or construction permits from the
8 FDEP for Interlachen Lakes Estates/Park Manor Wastewater System (Interlachen
9 Lakes Estates/Park Manor)?

10 A. Yes.

11 Q. Please state the issuance dates and the expiration dates of the
12 operating or construction permits.

13 A. Permit No. FLA011706 (D054-230516) was issued June 24, 1993 and expires
14 June 24, 1998.

15 Q. Are the plants in compliance with FDEP issued permits?

16 A. Yes.

17 Q. Are the wastewater collection, treatment and disposal facilities
18 adequate to serve present customers based on permitted capacity?

19 A. Yes. The plant only has one perc pond. The permit was recently
20 modified to allow the addition of a larger digester. The construction has not
21 been completed yet.

22 Q. Are the treatment and disposal facilities located in accordance with
23 Rule 62-600, Florida Administrative Code?

24 A. Yes.

25 Q. Has the FDEP required the utility to take any action so as to minimize

1 possible adverse effects resulting from odors, noise, aerosol drift or
2 lighting?

3 A. No.

4 Q. Do the pump stations and lift stations meet FDEP requirements with
5 respect to location, reliability and safety?

6 A. Yes.

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

9 A. Yes.

10 Q. Is the overall maintenance of the treatment, collection, and disposal
11 facilities satisfactory?

12 A. Yes.

13 Q. Does the facility meet the effluent disposal requirements of Rules
14 62-600 and 62-610, Florida Administrative Code?

15 A. Yes.

16 Q. Are the collection, treatment and disposal facilities in compliance with
17 all the other provisions of Chapter 62, Florida Administrative Code, not
18 previously mentioned?

19 A. Yes.

20 Q. Has Interlachen Lakes Estates/Park Manor wastewater system been the
21 subject of any FDEP enforcement action within the past two years?

22 A. No.

23 Palm Port Wastewater System

24 Q. Does the utility have current operating or construction permits from the
25 FDEP for Palm Port Wastewater System (Palm Port)?

1 A. Yes.

2 Q. Please state the issuance dates and the expiration dates of the
3 operating or construction permits.

4 A. Permit No. DO 54-230621 was issued July 21, 1993 and expires July 21,
5 1998.

6 Q. Are the plants in compliance with FDEP issued permits?

7 A. Yes.

8 Q. Are the wastewater collection, treatment and disposal facilities
9 adequate to serve present customers based on permitted capacity?

10 A. No. The effluent disposal site is inadequate to handle flows during
11 high rain. The ponds periodically discharge. The utility company has had a
12 report done to evaluate other disposal options.

13 Q. Are the treatment and disposal facilities located in accordance with
14 Rule 62-600, Florida Administrative Code?

15 A. Yes.

16 Q. Has the FDEP required the utility to take any action so as to minimize
17 possible adverse effects resulting from odors, noise, aerosol drift or
18 lighting?

19 A. No.

20 Q. Do the pump stations and lift stations meet FDEP requirements with
21 respect to location, reliability and safety?

22 A. Yes.

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

25 A. Yes.

1 Q. Is the overall maintenance of the treatment, collection, and disposal
2 facilities satisfactory?

3 A. Yes.

4 Q. Does the facility meet the effluent disposal requirements of Rules
5 62-600 and 62-610, Florida Administrative Code?

6 A. Yes. Other than the fact that the pond periodically discharges.

7 Q. Are the collection, treatment and disposal facilities in compliance with
8 all the other provisions of Chapter 62, Florida Administrative Code, not
9 previously mentioned?

10 A. Yes.

11 Q. Has Palm Port wastewater system been the subject of any FDEP enforcement
12 action within the past two years?

13 A. No.

14 Silver Lake Oaks Wastewater System

15 Q. Does the utility have current operating or construction permits from the
16 FDEP for Silver Lake Oaks Wastewater System (Silver Lake Oaks)?

17 A. Yes.

18 Q. Please state the issuance dates and the expiration dates of the
19 operating or construction permits.

20 A. Permit No. DO 54-193603 was issued August 9, 1991 and expires August 9,
21 1996.

22 Q. Are the plants in compliance with FDEP issued permits?

23 A. Yes.

24 Q. Are the wastewater collection, treatment and disposal facilities
25 adequate to serve present customers based on permitted capacity?

1 A. Yes.

2 Q. Are the treatment and disposal facilities located in accordance with
3 Rule 62-600, Florida Administrative Code?

4 A. Yes.

5 Q. Has the FDEP required the utility to take any action so as to minimize
6 possible adverse effects resulting from odors, noise, aerosol drift or
7 lighting?

8 A. No.

9 Q. Do the pump stations and lift stations meet FDEP requirements with
10 respect to location, reliability and safety?

11 A. Yes.

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

14 A. Yes.

15 Q. Is the overall maintenance of the treatment, collection, and disposal
16 facilities satisfactory?

17 A. Yes.

18 Q. Does the facility meet the effluent disposal requirements of Rules
19 62-600 and 62-610, Florida Administrative Code?

20 A. Yes.

21 Q. Are the collection, treatment and disposal facilities in compliance with
22 all the other provisions of Chapter 62, Florida Administrative Code, not
23 previously mentioned?

24 A. Yes.

25 Q. Has Silver Lake Oaks wastewater system been the subject of any FDEP

1 | enforcement action within the past two years?
2 | A. No.
3 | Q. Do you have anything further to add?
4 | A. No, I do not.
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