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**DOCKET NO.:** 950495-WS - [Southern States Utilities, Inc. - Valencia Terrace Water System, Picciola Island Water System, Quail Water System, Skycrest Water System]

**WITNESS:** Direct Testimony of Deborah de Paiva, Florida Department of Environmental Protection, Appearing on Behalf of the Staff of the Florida Public Service Commission

**DATE FILED:** February 26, 1996

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FPSC-RECORDS/REPORTING

DIRECT TESTIMONY OF DEBORAH DE PAIVA

1 |  
2 | Q. Please state your name and business address.

3 | A. Deborah de Paiva, 3319 Maguire Boulevard, Suite 232, Orlando, Florida,  
4 | 32803.

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

7 | A. I received a Bachelor of Science in mechanical engineering in August  
8 | 1992. I worked as an engineering co-op student for approximately 2 years at  
9 | the Florida Department of Environmental Protection (FDEP) while taking classes  
10 | at the University of Central Florida. Currently, I am an Engineer II at the  
11 | FDEP in the drinking water program.

12 | Q. By whom are you presently employed?

13 | A. I am employed by the Florida Department of Environmental Protection.  
14 | (FDEP)

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

16 | A. I have been employed by the FDEP three years as an engineer in the  
17 | drinking water compliance/enforcement section, following approximately 2 years  
18 | as an engineering co-op student.

19 | Q. What are your general responsibilities at the FDEP?

20 | A. My responsibilities are to conduct enforcement related activities, to  
21 | conduct sanitary surveys and compliance inspections of public water systems,  
22 | and to provide technical assistance.

23 | Q. Are you familiar with the Southern States Utilities Inc. water systems  
24 | located in the Central District?

25 | A. Yes.

1 Q. Were these systems inspected by you, or by FDEP staff under your  
2 supervision?

3 A. They were inspected by me.

4 Valencia Terrace Water System

5 Q. Does the utility have a current construction permit from the FDEP for  
6 Valencia Terrace Water System (Valencia Terrace)?

7 A. No.

8 Q. Are the utility's treatment facilities and distribution system  
9 sufficient to serve its present customers?

10 A. Yes.

11 Q. Does the utility maintain the required 20 psi minimum pressure  
12 throughout the distribution system?

13 A. Yes.

14 Q. Does the utility have an adequate auxiliary power source in the event  
15 of a power outage?

16 A. Yes.

17 Q. Are the utility's water wells for Valencia Terrace located in compliance  
18 with Rule 62-555, Florida Administrative Code?

19 A. Yes.

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

22 A. Yes.

23 Q. Has the utility established a cross-connection control program in  
24 accordance with Rule 62-555.360, Florida Administrative Code?

25 A. Yes. Southern States Utilities, Inc. has established a cross-connection

1 | control program for all of its water systems.

2 | Q. Is the overall maintenance of the treatment plant and distribution  
3 | facilities satisfactory?

4 | A. Yes.

5 | Q. Does the water produced by the utility meet the State and Federal  
6 | maximum contaminant levels for primary and secondary water quality standards?

7 | A. Yes.

8 | Q. Does the utility monitor the organic contaminants listed in Rule  
9 | 62-550.410, Florida Administrative Code?

10 | A. Yes.

11 | Q. Do recent chemical analyses of raw and finished water, when compared to  
12 | regulations, suggest the need for additional treatment?

13 | A. No.

14 | Q. Does the utility maintain the required chlorine residual or its  
15 | equivalent throughout the distribution system?

16 | A. Yes.

17 | Q. Are the plant and distribution systems in compliance with all the other  
18 | provisions of Chapter 62, Florida Administrative Code, not previously mentioned?

19 | A. Yes.

20 | Q. Has Valencia Terrace been the subject of any FDEP enforcement action  
21 | within the past two years?

22 | A. No.

23 | Q. Do you have anything further to add?

24 | A. At the time of my last inspection, Lake Utilities Company was the owner  
25 | of this water systems.

Picciola Island Water System

1  
2 Q. Does the utility have a current construction permit from the FDEP for  
3 Picciola Island Water System (Picciola Island)?

4 A. No.

5 Q. Are the utility's treatment facilities and distribution system  
6 sufficient to serve its present customers?

7 A. Yes.

8 Q. Does the utility maintain the required 20 psi minimum pressure  
9 throughout the distribution system?

10 A. Yes.

11 Q. Does the utility have an adequate auxiliary power source in the event  
12 of a power outage?

13 A. Yes.

14 Q. Are the utility's water wells for Picciola Island located in compliance  
15 with Rule 62-555, Florida Administrative Code?

16 A. No. Septic tanks and/or drainfields are located within 200 feet of both  
17 wells. However, FDEP accepted the distances in a letter dated September 23,  
18 1993, based on satisfactory department records.

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

21 A. Yes.

22 Q. Has the utility established a cross-connection control program in  
23 accordance with Rule 62-555.360, Florida Administrative Code?

24 A. Yes. Southern States Utilities, Inc. has established a cross-connection  
25 control program for all of its water systems.

1 | Q. Is the overall maintenance of the treatment plant and distribution  
2 | facilities satisfactory?

3 | A. Yes.

4 | Q. Does the water produced by the utility meet the State and Federal  
5 | maximum contaminant levels for primary and secondary water quality standards?

6 | A. Yes.

7 | Q. Does the utility monitor the organic contaminants listed in Rule  
8 | 62-550.410, Florida Administrative Code?

9 | A. Yes.

10 | Q. Do recent chemical analyses of raw and finished water, when compared to  
11 | regulations, suggest the need for additional treatment?

12 | A. No.

13 | Q. Does the utility maintain the required chlorine residual or its  
14 | equivalent throughout the distribution system?

15 | A. Yes.

16 | Q. Are the plant and distribution systems in compliance with all the other  
17 | provisions of Chapter 62, Florida Administrative Code, not previously  
18 | mentioned?

19 | A. Yes.

20 | Q. Has Picciola Island been the subject of any Department of Environmental  
21 | Protection enforcement action within the past two years?

22 | A. No.

23 | Quail Ridge Water System

24 | Q. Does the utility have a current construction permit from the FDEP for  
25 | Quail Ridge Water System (Quail Ridge)?

1 A. No.

2 Q. Are the utility's treatment facilities and distribution system  
3 sufficient to serve its present customers?

4 A. Yes.

5 Q. Does the utility maintain the required 20 psi minimum pressure  
6 throughout the distribution system?

7 A. Yes.

8 Q. Does the utility have an adequate auxiliary power source in the event  
9 of a power outage?

10 A. No. According to Rule 62-555.320(6), Florida Administrative Code, an  
11 auxiliary power source is required if the community water system serves 350  
12 or more persons or if the system has 150 or more service connections.  
13 According to the most recent monthly operation report, there are 28 service  
14 connections and 98 people served by this water system. Therefore, an auxiliary  
15 power source is not required.

16 Q. Are the utility's water wells for Quail Ridge located in compliance with  
17 Rule 62-555, Florida Administrative Code?

18 A. Yes.

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

21 A. Yes.

22 Q. Has the utility established a cross-connection control program in  
23 accordance with Rule 62-555.360, Florida Administrative Code?

24 A. Yes. Southern States Utilities, Inc. has established a cross-connection  
25 control program for all of its water systems.

1 | Q. Is the overall maintenance of the treatment plant and distribution  
2 | facilities satisfactory?  
3 | A. Yes.  
4 | Q. Does the water produced by the utility meet the State and Federal  
5 | maximum contaminant levels for primary and secondary water quality standards?  
6 | A. Yes.  
7 | Q. Does the utility monitor the organic contaminants listed in Rule  
8 | 62-550.410, Florida Administrative Code?  
9 | A. Yes. The utility monitors for volatile organic contaminants and for  
10 | pesticides and polychlorinated biphenyls. However, the utility submitted a  
11 | waiver in 1993 for unregulated organic contaminants monitoring, since the  
12 | system is eligible for the waiver.  
13 | Q. Do recent chemical analyses of raw and finished water, when compared to  
14 | regulations, suggest the need for additional treatment?  
15 | A. No.  
16 | Q. Does the utility maintain the required chlorine residual or its  
17 | equivalent throughout the distribution system?  
18 | A. Yes.  
19 | Q. Are the plant and distribution systems in compliance with all the other  
20 | provisions of Chapter 62, Florida Administrative Code, not previously  
21 | mentioned?  
22 | A. Yes.  
23 | Q. Has Quail Ridge been the subject of any FDEP enforcement action within  
24 | the past two years?  
25 | A. No.



1 Skycrest Water System

2 Q. Does the utility have a current construction permit from the FDEP for  
3 Skycrest Water System (Skycrest)?

4 A. No.

5 Q. Are the utility's treatment facilities and distribution system  
6 sufficient to serve its present customers?

7 A. Yes.

8 Q. Does the utility maintain the required 20 psi minimum pressure  
9 throughout the distribution system?

10 A. Yes.

11 Q. Does the utility have an adequate auxiliary power source in the event  
12 of a power outage?

13 A. Yes.

14 Q. Are the utility's water wells for Skycrest located in compliance with  
15 Rule 62-555, Florida Administrative Code?

16 A. Yes.

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

19 A. Yes.

20 Q. Has the utility established a cross-connection control program in  
21 accordance with Rule 62-555.360, Florida Administrative Code?

22 A. Yes. Southern States Utilities, Inc. has established a cross-connection  
23 control program for all of its water systems.

24 Q. Is the overall maintenance of the treatment plant and distribution  
25 facilities satisfactory?

1 | A. Yes.

2 | Q. Does the water produced by the utility meet the State and Federal  
3 | maximum contaminant levels for primary and secondary water quality standards?

4 | A. Yes.

5 | Q. Does the utility monitor the organic contaminants listed in Rule  
6 | 62-550.410, Florida Administrative Code?

7 | A. Yes.

8 | Q. Do recent chemical analyses of raw and finished water, when compared to  
9 | regulations, suggest the need for additional treatment?

10 | A. No.

11 | Q. Does the utility maintain the required chlorine residual or its  
12 | equivalent throughout the distribution system?

13 | A. Yes.

14 | Q. Are the plant and distribution systems in compliance with all the other  
15 | provisions of Chapter 62, Florida Administrative Code, not previously  
16 | mentioned?

17 | A. Yes.

18 | Q. Has Skycrest been the subject of any FDEP enforcement action within the  
19 | past two years?

20 | A. No.

21 | Q. Do you have anything further to add?

22 | A. No, I do not.

23 |

24 |

25 |