

ORIGINAL
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DOCKET NO. 960451-WS - APPLICATION FOR RATE INCREASE IN
DUVAL, NASSAU, AND ST. JOHNS COUNTIES BY UNITED WATER
FLORIDA INC.

DIRECT TESTIMONY OF DAVID J. BOLAM, DEPARTMENT OF
ENVIRONMENTAL PROTECTION, APPEARING ON BEHALF OF THE
STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION

DATE FILED: DECEMBER 18, 1996

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DIRECT TESTIMONY OF DAVID J. BOLAM

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

3 A. My name is David J. Bolam and my business address is 7825 Baymeadows
4 Way, Suite 200B, Jacksonville, Florida, 32256.

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

7 A. I received a Bachelor of Science degree in Environmental Engineering
8 from the University of Florida in 1984. I am also a registered as a
9 Professional Engineer in the state of Florida, License 42480.

10 I have been employed with the Florida Department of Environmental
11 Protection (FDEP) as an engineer in the Water Facilities program supervising
12 permitting for water and wastewater facilities. I have been a permitting
13 supervisor for the FDEP from January 1994 to the present. I was a private
14 engineering consultant from October, 1984 until December, 1993.

15 Q. By whom are you presently employed?

16 A. The Florida Department of Environmental Protection.

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

18 A. I have been employed with the FDEP since January, 1994 in the Water
19 Facilities Program. I was originally hired as a Professional Engineer II and
20 have held this position since being hired.

21 Q. What are your general responsibilities at the DEP?

22 A. I am the Domestic Wastewater Permitting supervisor.

23 Q. Are you familiar with United Water Florida Inc.'s Royal Lakes wastewater
24 facility in Duval County?

25 A. Yes.

- 1 Q. Does the utility have a current operating permit from the Department of
2 Environmental Protection?
- 3 A. Yes.
- 4 Q. Please state the issuance date and the expiration date of the operating
5 permit.
- 6 A. The operating permit, NPDES permit number FL0026751, was issued on
7 January 1, 1993 and expires on January 31, 1998.
- 8 Q. Is the plant in compliance with its permit?
- 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. Yes. The permitted capacity is 3.25 mgd and the 3 month average annual
13 daily flow as of September, 1996 was 2.46 mgd.
- 14 Q. Are the treatment and disposal facilities located in accordance with
15 Rule 62-600.400(2)(c), 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 DEP requirements with
22 respect to location, reliability and safety?
- 23 A. Yes.
- 24 Q. Does the utility have certified operators as required by Chapter 62-699,
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 all applicable technology-based effluent
6 | limitations (TBELS) and water quality based effluent limitations (WQBELS)?

7 | A. Yes.

8 | Q. Does the facility meet the effluent disposal requirements of Rules
9 | 62-600 and 62-620, Florida Administrative Code?

10 | A. Yes.

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

14 | A. Yes.

15 | Q. Has UWF's Royal Lakes wastewater facility been the subject of any
16 | Department of Environmental Protection enforcement action within the past two
17 | years?

18 | A. No.

19 | Q. Are you familiar with United Water Florida Inc.'s Monterey wastewater
20 | facility in Duval County?

21 | A. Yes.

22 | Q. Does the utility have a current operating permit from the Department of
23 | Environmental Protection?

24 | A. Yes.

25 | Q. Please state the issuance date and the expiration date of the operating

- 1 | permit.
- 2 | A. The operating permit, NPDES permit number FL0023604, was issued on April
- 3 | 2, 1996 and expires on April 2, 2001.
- 4 | Q. Is the plant in compliance with its permit?
- 5 | A. Yes.
- 6 | Q. Are the wastewater collection, treatment and disposal facilities
- 7 | adequate to serve present customers based on permitted capacity?
- 8 | A. Yes.
- 9 | Q. Are the treatment and disposal facilities located in accordance with
- 10 | Rule 62-600.400(2)(c), Florida Administrative Code?
- 11 | A. Yes.
- 12 | Q. Has the Department of Environmental Protection (DEP) required the
- 13 | utility to take any action so as to minimize possible adverse effects
- 14 | resulting from odors, noise, aerosol drift or lighting?
- 15 | A. No.
- 16 | Q. Do the pump stations and lift stations meet DEP requirements with
- 17 | respect to location, reliability and safety?
- 18 | A. Yes.
- 19 | Q. Does the utility have certified operators as required by Chapter 62-699,
- 20 | Florida Administrative Code?
- 21 | A. Yes.
- 22 | Q. Is the overall maintenance of the treatment, collection, and disposal
- 23 | facilities satisfactory?
- 24 | A. Yes.
- 25 | Q. Does the facility meet all applicable technology based effluent

1 | limitations (TBELS) and water quality based effluent limitations (WQBELS)?
2 | A. Yes.
3 | Q. Does the facility meet the effluent disposal requirements of Rules
4 | 62-600 and 62-610, Florida Administrative Code?
5 | A. Yes.
6 | Q. Are the collection, treatment and disposal facilities in compliance with
7 | all the other provisions of Chapter 62, Florida Administrative Code, not
8 | previously mentioned?
9 | A. Yes.
10 | Q. Has UWF's Monterey wastewater facility been the subject of any
11 | Department of Environmental Protection enforcement action within the past two
12 | years?
13 | A. No.
14 | Q. Are you familiar with United Water Florida Inc.'s San Jose wastewater
15 | facility in Duval County?
16 | A. Yes.
17 | Q. Does the utility have a current operating permit from the Department of
18 | Environmental Protection?
19 | A. Yes.
20 | Q. Please state the issuance date and the expiration date of the operating
21 | permit.
22 | A. The operating permit, NPDES permit number FL0023663, expired on
23 | September 30, 1995. An application for renewal of the permit is currently
24 | being processed. During the processing period, the former permit is
25 | administratively extended.

- 1 Q. Is the plant in compliance with its permit?
- 2 A. Yes.
- 3 Q. Are the wastewater collection, treatment and disposal facilities
- 4 adequate to serve present customers based on permitted capacity?
- 5 A. Yes.
- 6 Q. Are the treatment and disposal facilities located in accordance with
- 7 Rule 62-600.400(2)(c), Florida Administrative Code?
- 8 A. Yes.
- 9 Q. Has the FDEP required the utility to take any action so as to minimize
- 10 possible adverse effects resulting from odors, noise, aerosol drift or
- 11 lighting?
- 12 A. No.
- 13 Q. Do the pump stations and lift stations meet DEP requirements with
- 14 respect to location, reliability and safety?
- 15 A. Yes.
- 16 Q. Does the utility have certified operators as required by Chapter 62-699,
- 17 Florida Administrative Code?
- 18 A. Yes.
- 19 Q. Is the overall maintenance of the treatment, collection, and disposal
- 20 facilities satisfactory?
- 21 A. Yes.
- 22 Q. Does the facility meet all applicable technology based effluent
- 23 limitations (TBELS) and water quality based effluent limitations (WQBELS)?
- 24 A. Yes.
- 25 Q. Does the facility meet the effluent disposal requirements of Rules

1 | 62-600, Florida Administrative Code?
2 | A. Yes.
3 | Q. Are the collection, treatment and disposal facilities in compliance with
4 | all the other provisions of Chapter 62, Florida Administrative Code, not
5 | previously mentioned?
6 | A. Yes.
7 | Q. Has UWF's San Jose wastewater facility been the subject of any
8 | Department of Environmental Protection enforcement action within the past two
9 | years?
10 | A. No.
11 | Q. Are you familiar with United Water Florida Inc.'s Jacksonville Heights
12 | wastewater facility in Duval County?
13 | A. Yes.
14 | Q. Does the utility have a current operating permit from the Department of
15 | Environmental Protection?
16 | A. Yes.
17 | Q. Please state the issuance date and the expiration date of the operating
18 | permit.
19 | A. The operating permit, NPDES permit number FL0023671, was issued on
20 | November 9, 1993 and expires on April 1, 1998.
21 | Q. Is the plant in compliance with its permit?
22 | A. Yes. Due to past violations of chronic toxicity limitations, however,
23 | the FDEP will issue a consent order with no penalties which require that UWF
24 | monitor and collect data to determine whether or not a mixing zone is needed.
25 | Q. Are the wastewater collection, treatment and disposal facilities

- 1 adequate to serve present customers based on permitted capacity?
- 2 A. Yes.
- 3 Q. Are the treatment and disposal facilities located in accordance with
- 4 Rule 62-600.400(2)(c), Florida Administrative Code?
- 5 A. Yes.
- 6 Q. Has the FDEP required the utility to take any action so as to minimize
- 7 possible adverse effects resulting from odors, noise, aerosol drift or
- 8 lighting?
- 9 A. No.
- 10 Q. Do the pump stations and lift stations meet DEP requirements with
- 11 respect to location, reliability and safety?
- 12 A. Yes.
- 13 Q. Does the utility have certified operators as required by Chapter 62-699,
- 14 Florida Administrative Code?
- 15 A. Yes.
- 16 Q. Is the overall maintenance of the treatment, collection, and disposal
- 17 facilities satisfactory?
- 18 A. Yes.
- 19 Q. Does the facility meet all applicable technology based effluent
- 20 limitations (TBELS) and water quality based effluent limitations (WQBELS)?
- 21 A. No. As I discussed earlier, the facility has exceeded its whole
- 22 effluent toxicity limit and the FDEP intends to issue a consent order with no
- 23 penalties for this violation.
- 24 Q. Does the facility meet the effluent disposal requirements of Rules
- 25 62-600, Florida Administrative Code?

1 A. Yes.

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

5 A. Yes.

6 Q. Has UWF's Jacksonville Heights wastewater facility been the subject of
7 any Department of Environmental Protection enforcement action within the past
8 two years?

9 A. No. The forthcoming issuance of the consent order, however, is a
10 continuation of EPA's enforcement regarding the Whole Effluent Toxicity (WET)
11 testing failures.

12 Q. Are you familiar with United Water Florida Inc.'s Holly Oaks wastewater
13 facility in Duval County?

14 A. Yes.

15 Q. Does the utility have a current operating permit from the Department of
16 Environmental Protection?

17 A. Yes.

18 Q. Please state the issuance date and the expiration date of the operating
19 permit.

20 A. The operating permit, NPDES permit number FL0023621, was issued on
21 September 27, 1990 and expired on September 30, 1995. A permit renewal
22 application is currently being processed. During the processing period, the
23 former permit is administratively extended.

24 Q. Are the plants in compliance with its permits?

25 A. Yes.

- 1 Q. Are the wastewater collection, treatment and disposal facilities
2 adequate to serve present customers based on permitted capacity?
- 3 A. Yes.
- 4 Q. Are the treatment and disposal facilities located in accordance with
5 Rule 62-600.400(2)(c), Florida Administrative Code?
- 6 A. Yes.
- 7 Q. Has the FDEP required the utility to take any action so as to minimize
8 possible adverse effects resulting from odors, noise, aerosol drift or
9 lighting?
- 10 A. No.
- 11 Q. Do the pump stations and lift stations meet DEP requirements with
12 respect to location, reliability and safety?
- 13 A. Yes.
- 14 Q. Does the utility have certified operators as required by Chapter 62-699,
15 Florida Administrative Code?
- 16 A. Yes.
- 17 Q. Is the overall maintenance of the treatment, collection, and disposal
18 facilities satisfactory?
- 19 A. No. Corrosion is noted at this facility and must be repaired.
- 20 Q. Does the facility meet all applicable technology based effluent
21 limitations (TBELS) and water quality based effluent limitations (WQBELS)?
- 22 A. Yes.
- 23 Q. Does the facility meet the effluent disposal requirements of Rules
24 62-600 and 62-610, Florida Administrative Code?
- 25 A. Yes.

1 Q. Are the collection, treatment and disposal facilities in compliance with
2 all the other provisions of Chapter 62, Florida Administrative Code, not
3 previously mentioned?
4 A. Yes.

5 Q. Has UWF's Holly Oaks wastewater facility been the subject of any
6 Department of Environmental Protection enforcement action within the past two
7 years?
8 A. No.

9 Q. Are you familiar with United Water Florida Inc.'s Lofton Oaks wastewater
10 facility in Nassau County?
11 A. Yes.

12 Q. Does the utility have a current operating permit from the Department of
13 Environmental Protection?
14 A. Yes.

15 Q. Please state the issuance date and the expiration date of the operating
16 permit.
17 A. The operating permit, permit number D045-260422, was issued December 1,
18 1994 and expires on December 1, 1999.

19 Q. Is the plant in compliance with its permit?
20 A. Yes.

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

24 Q. Are the treatment and disposal facilities located in accordance with
25 Rule 62-600.400(2)(c), Florida Administrative Code?

- 1 A. Yes.
- 2 Q. Has the Department of Environmental Protection (DEP) required the
3 utility to take any action so as to minimize possible adverse effects
4 resulting from odors, noise, aerosol drift or lighting?
- 5 A. No.
- 6 Q. Do the pump stations and lift stations meet DEP requirements with
7 respect to location, reliability and safety?
- 8 A. Yes.
- 9 Q. Does the utility have certified operators as required by Chapter 62-699,
10 Florida Administrative Code?
- 11 A. Yes.
- 12 Q. Is the overall maintenance of the treatment, collection, and disposal
13 facilities satisfactory?
- 14 A. Yes.
- 15 Q. Does the facility meet all applicable technology based effluent
16 limitations (TBELS) and water quality based effluent limitations (WQBELS)?
- 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 UWF's Lofton Oaks wastewater facility been the subject of any

- 1 | Department of Environmental Protection enforcement action within the past two
2 | years?
- 3 | A. No.
- 4 | Q. Are you familiar with United Water Florida Inc.'s Ortega Hills
5 | wastewater facility in Duval County?
- 6 | A. Yes.
- 7 | Q. Does the utility have a current operating permit from the Department of
8 | Environmental Protection?
- 9 | A. Yes.
- 10 | Q. Please state the issuance date and the expiration date of the operating
11 | permit.
- 12 | A. The operating permit, NPDES permit number FL0025828, was issued on
13 | October 25, 1995 and expires on October 25, 2000.
- 14 | Q. Is the plant in compliance with its permit?
- 15 | A. Yes. The permit has a self-imposed improvement schedule for the
16 | connection of this facility to the Ortega Blanding regional wastewater
17 | treatment plant.
- 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 62-600.400(2)(c), 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 DEP requirements with
4 | respect to location, reliability and safety?

5 | A. Yes.

6 | Q. Does the utility have certified operators as required by Chapter 62-699,
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 all applicable technology based effluent
13 | limitations (TBELS) and water quality based effluent limitations (WQBELS)?

14 | A. Yes.

15 | Q. Does the facility meet the effluent disposal requirements of Rules
16 | 62-600, Florida Administrative Code?

17 | A. Yes.

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

21 | A. Yes.

22 | Q. Has UWF's Ortega Hills wastewater facility been the subject of any
23 | Department of Environmental Protection enforcement action within the past two
24 | years?

25 | A. No.

1 Q. Are you familiar with United Water Florida Inc.'s San Pablo wastewater
2 facility in Duval County?

3 A. Yes.

4 Q. Does the utility have a current operating permit from the Department of
5 Environmental Protection?

6 A. Yes.

7 Q. Please state the issuance date and the expiration date of the operating
8 permit.

9 A. The operating permit, NPDES permit number FL0024767, was issued on July
10 19, 1990 and expired on May 31, 1995. A permit renewal application is
11 currently being processed. During the processing period, the former permit
12 is administratively extended.

13 Q. Is the plant in compliance with its permit?

14 A. Yes.

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

17 A. Yes. Flow projections indicate, however, that the plant will reach its
18 permitted capacity within five years and a plant expansion to 0.7 mgd is
19 proposed.

20 Q. Are the treatment and disposal facilities located in accordance with
21 Rule 62-600.400(2)(c), Florida Administrative Code?

22 A. Yes.

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

- 1 A. No.
- 2 Q. Do the pump stations and lift stations meet DEP requirements with
3 respect to location, reliability and safety?
- 4 A. Yes.
- 5 Q. Does the utility have certified operators as required by Chapter 62-699,
6 Florida Administrative Code?
- 7 A. Yes.
- 8 Q. Is the overall maintenance of the treatment, collection, and disposal
9 facilities satisfactory?
- 10 A. Yes.
- 11 Q. Does the facility meet all applicable technology based effluent
12 limitations (TBELS) and water quality based effluent limitations (WQBELS)?
- 13 A. Yes.
- 14 Q. Does the facility meet the effluent disposal requirements of Rules
15 62-600 and 62-610, Florida Administrative Code?
- 16 A. Yes.
- 17 Q. Are the collection, treatment and disposal facilities in compliance with
18 all the other provisions of Chapter 62, Florida Administrative Code, not
19 previously mentioned?
- 20 A. Yes.
- 21 Q. Has UWF's San Pablo wastewater facility been the subject of any
22 Department of Environmental Protection enforcement action within the past two
23 years?
- 24 A. No.
- 25 Q. Are you familiar with United Water Florida Inc.'s Ponte Vedra wastewater

- 1 facility in St. John's County?
- 2 A. Yes.
- 3 Q. Does the utility have a current operating permit from the Department of
4 Environmental Protection?
- 5 A. Yes.
- 6 Q. Please state the issuance date and the expiration date of the operating
7 permit.
- 8 A. The operating permit, NPDES permit number FL0117951, was issued on
9 November 12, 1996 and expires on November 12, 2001.
- 10 Q. Is the plant in compliance with its permit?
- 11 A. Yes.
- 12 Q. Are the wastewater collection, treatment and disposal facilities
13 adequate to serve present customers based on permitted capacity?
- 14 A. No. The percolation ponds are overloaded and an alternate effluent
15 disposal method is required.
- 16 Q. Are the treatment and disposal facilities located in accordance with
17 Rule 62-600.400(2)(c), Florida Administrative Code?
- 18 A. Yes.
- 19 Q. Has the Department of Environmental Protection (DEP) required the
20 utility to take any action so as to minimize possible adverse effects
21 resulting from odors, noise, aerosol drift or lighting?
- 22 A. No.
- 23 Q. Do the pump stations and lift stations meet DEP requirements with
24 respect to location, reliability and safety?
- 25 A. Yes.

1 Q. Does the utility have certified operators as required by Chapter 62-699,
2 Florida Administrative Code?
3 A. Yes.
4 Q. Is the overall maintenance of the treatment, collection, and disposal
5 facilities satisfactory?
6 A. No. The percolation ponds do not function in accordance with FDEP's
7 requirements. UWF has proposed an alternative disposal method and the FDEP
8 concurs with this proposal.
9 Q. Does the facility meet all applicable technology based effluent
10 limitations (TBELS) and water quality based effluent limitations (WQBELS)?
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. This facility is in compliance with Chapter 62-600 but, since the
15 percolation ponds are not functioning properly, it is not in compliance with
16 Chapter 62-610.
17 Q. Are the collection, treatment and disposal facilities in compliance with
18 all the other provisions of Chapter 62, Florida Administrative Code, not
19 previously mentioned?
20 A. Yes.
21 Q. Has UWF's Ponte Vedra wastewater facility been the subject of any
22 Department of Environmental Protection enforcement action within the past two
23 years?
24 A. No.
25 Q. Are you familiar with United Water Florida, Inc.'s Ponce de Leon

- 1 | wastewater facility in St. John's County?
- 2 | A. Yes.
- 3 | Q. Does the utility have a current operating permit from the Department of
4 | Environmental Protection?
- 5 | A. Yes.
- 6 | Q. Please state the issuance date and the expiration date of the operating
7 | permit.
- 8 | A. The operating permit, permit number D055-253570, was issued on October
9 | 25, 1994 and expires on August 23, 1999.
- 10 | Q. Is the plant in compliance with its permit?
- 11 | A. Yes.
- 12 | Q. Are the wastewater collection, treatment and disposal facilities
13 | adequate to serve present customers based on permitted capacity?
- 14 | A. Yes.
- 15 | Q. Are the treatment and disposal facilities located in accordance with
16 | Rule 62-600.400(2)(c), Florida Administrative Code?
- 17 | A. Yes.
- 18 | Q. Has the FDEP required the utility to take any action so as to minimize
19 | possible adverse effects resulting from odors, noise, aerosol drift or
20 | lighting?
- 21 | A. No.
- 22 | Q. Do the pump stations and lift stations meet DEP requirements with
23 | respect to location, reliability and safety?
- 24 | A. Yes.
- 25 | Q. Does the utility have certified operators as required by Chapter 62-699.

- 1 | Florida Administrative Code?
- 2 | A. Yes.
- 3 | Q. Is the overall maintenance of the treatment, collection, and disposal
- 4 | facilities satisfactory?
- 5 | A. Yes.
- 6 | Q. Does the facility meet all applicable technology based effluent
- 7 | limitations (TBELS) and water quality based effluent limitations (WQBELS)?
- 8 | A. Yes.
- 9 | Q. Does the facility meet the effluent disposal requirements of Rules
- 10 | 62-600 and 62-610, Florida Administrative Code?
- 11 | A. Yes.
- 12 | Q. Are the collection, treatment and disposal facilities in compliance with
- 13 | all the other provisions of Chapter 62, Florida Administrative Code, not
- 14 | previously mentioned?
- 15 | A. Yes.
- 16 | Q. Has UWF's Ponce de Leon wastewater facility been the subject of any
- 17 | Department of Environmental Protection enforcement action within the past two
- 18 | years?
- 19 | A. No.
- 20 | Q. Are you familiar with United Water Florida, Inc.'s St. Johns North
- 21 | wastewater facility in St. John's County?
- 22 | A. Yes.
- 23 | Q. Does the utility have a current operating permit from the Department of
- 24 | Environmental Protection?
- 25 | A. Yes.

1 | Q: Please state the issuance date and the expiration date of the operating
2 | permit.

3 | A. The operating permit, permit number D055-194157, was issued on August
4 | 30, 1991 and expired on August 30, 1996. An application for renewal of the
5 | permit, as an NPDES (surface water discharge) permit, is currently being
6 | processed.

7 | Q. Please state whether the permit is a temporary operating permit, and if
8 | so, please describe the permit terms.

9 | A. The permit was issued with an administrative order which allows for the
10 | temporary operation of the facility while an alternative effluent disposal
11 | method is evaluated.

12 | Q. Is the plant in compliance with its permit?

13 | A. No. The percolation ponds do not function properly and have limited
14 | capacity.

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

17 | A. No. The utility must determine and implement an alternative effluent
18 | disposal method. The permitted capacity is 45,000 gpd and average daily flows
19 | to this facility are 150,000 to 180,000 gpd.

20 | Q. Are the treatment and disposal facilities located in accordance with
21 | Rule 62-600.400(2)(c), Florida Administrative Code?

22 | A. Yes.

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

- 1 A. No.
- 2 Q. Do the pump stations and lift stations meet DEP requirements with
3 respect to location, reliability and safety?
- 4 A. Yes.
- 5 Q. Does the utility have certified operators as required by Chapter 62-699,
6 Florida Administrative Code?
- 7 A. Yes.
- 8 Q. Is the overall maintenance of the treatment, collection, and disposal
9 facilities satisfactory?
- 10 A. Yes.
- 11 Q. Does the facility meet all applicable technology based effluent
12 limitations (TBELS) and water quality based effluent limitations (WQBELS)?
- 13 A. No. The facility will be unable to meet WQBEL limits in the pending
14 NPDES permit. Therefore, an Administrative Order will be attached to the
15 pending permit to allow continued operation while UWF evaluates and implements
16 an alternative effluent disposal method.
- 17 Q. Does the facility meet the effluent disposal requirements of Rules
18 62-600 and 62-610, Florida Administrative Code?
- 19 A. This facility is in compliance with Chapter 62-600 but, since the
20 percolation ponds are not functioning properly, it is not in compliance with
21 Chapter 62-610.
- 22 Q. Are the collection, treatment and disposal facilities in compliance with
23 all the other provisions of Chapter 62, Florida Administrative Code, not
24 previously mentioned?
- 25 A. Yes.

- 1 Q. Has UWF's St. Johns North wastewater facility been the subject of any
2 Department of Environmental Protection enforcement action within the past two
3 years?
- 4 A. No. An administrative order is a permitting device similar to the
5 former Temporary Operating Permit. It is not considered by the FDEP as formal
6 enforcement.
- 7 Q. Are you familiar with United Water Florida Inc.'s Amoco Yulee wastewater
8 facility in Nassau County?
- 9 A. Yes.
- 10 Q. Does the utility have a current operating permit from the Department of
11 Environmental Protection?
- 12 A. Yes.
- 13 Q. Please state the issuance date and the expiration date of the operating
14 permit.
- 15 A. The operating permit, permit number FLA016675, was issued on June 12,
16 1996 and expires on June 12, 2001.
- 17 Q. Is the plant in compliance with its permit?
- 18 A. No. This facility has had continued nitrate violations.
- 19 Q. Are the wastewater collection, treatment and disposal facilities
20 adequate to serve present customers based on permitted capacity?
- 21 A. Yes. The permitted capacity is 3,360 gpd.
- 22 Q. Are the treatment and disposal facilities located in accordance with
23 Rule 62-600.400(2)(c), 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 DEP requirements with
5 respect to location, reliability and safety?

6 A. Yes.

7 Q. Does the utility have certified operators as required by Chapter 62-699,
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 all applicable technology based effluent
14 limitations (TBELS) and water quality based effluent limitations (WQBELS)?

15 A. No. The facility is oversized for the service station's needs and it
16 does not receive sufficient loading to function properly. Suggested
17 corrective actions would be to either connect the customer to a regional
18 system or install an on-site system (septic tank) if possible.

19 Q. Does the facility meet the effluent disposal requirements of Rules
20 62-600 and 62-610, Florida Administrative Code?

21 A. No. The effluent exceeds nitrate limitations.

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

25 A. Yes.

1 Q. Has UWF's Amoco Yulee wastewater facility been the subject of any
2 Department of Environmental Protection enforcement action within the past two
3 years?

4 A. No formal enforcement has been initiated.

5 Q. Do you have anything further to add?

6 A. No.

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