



Public Service Commission

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COMMISSION
CLERK

DATE: April 19, 2004

TO: Kay B. Flynn, Chief of Records and Hearing Services, Division of the Commission Clerk & Administrative Services

FROM: Marshall W. Willis, Chief of Rate Filings, Division of Economic Regulation *(Signature)*

RE: Docket No. 020896-WS - Petition by Customers of Aloha Utilities, Inc for Deletion of Portion of Territory in Seven Springs Area in Pasco County

Please file the attached letter, dated April 9, 2004, from Dr. Abraham Kurien, in the above referenced docket.

- AUS _____
- CAF _____
- CMP _____
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- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC 1
- OTH _____

cc: Division of Economic Regulation (Walden)
Office of the General Counsel (Gervasi)

DOCUMENT NUMBER-DATE

04656 APR 20 03

FPSC-COMMISSION CLERK

V. Abraham Kurien, M.D.
1822 Orchardgrove Ave,
NEW PORT RICHEY, FL 34655
EMAIL: akurien@attglobal.net

Mr Marshall M. Willis, CPA
Chief of Rate Cases
Division of Economic Regulation
2540 Shumard Oak Boulevard
TALLAHASSEE, 32399-0850

RECEIVED
FLORIDA PUBLIC SERVICE
COMMISSION
04 APR 12 AM 9:55
DIVISION OF
ECONOMIC REGULATION
April 9, 2004

Dear Mr Marshall,

First of all, allow me to say a Thank you to the PSC team and Commissioners who came down to New Port Richey to the Hearing of the Customers' Petition Docket No. 020896. It gives us the assurance that you are working on our behalf to find an appropriate solution to the problem of black water and foul smell in the water in our domestic plumbing.

I am forwarding to you with this letter documentation showing that the hydrogen sulfide at well 9 was 4.3 mg/l on May 12, 1994, even before the well was brought on line to relieve the low pressure problems which apparently was the main concern of the customers of Aloha at that time. On May 24, 1994 a report was submitted to Aloha indicating that the "total odor number was <1" with an apparent maximum allowed level of 3. As I pointed out at the Hearing, the level of 4.3mg/l is at least 40 times the detectable level that can be detected by the human nose! These reports were copied from files at the Tampa Office of the FDEP.

It is necessary to point out that the chlorinator installed subsequently at Well 9 has a maximum injection capacity of only 25 mg of chlorine per liter of raw water. According to Dr Levine's calculations (Phase I report, pages 20 and 21) "for sulfide levels up to about 2.6 mg/L., there is adequate chlorination capacity to completely oxidize the sulfide to either sulfur or sulfate and maintain a chlorine residual of about 3 mg/L. If all the sulfide is oxidized to elemental sulfur, there is adequate chlorination capacity at well 9 to oxidize up to about 11 mg/L of sulfide and still maintain a chlorine residual of about 3mg/L".

What this implies is that whenever sulfide levels are above 2.6 mg/L at well 9, there is obligatory formation of elemental sulfur at that well. Of the 23 samples of raw water hydrogen sulfide levels mentioned in Phase I and II of Dr Levine's report, 21 samples had levels higher than 3.5 mg/L., and processed water delivered on those occasions would have had significant levels of sulfur, resulting in elemental sulfur being delivered into domestic supply, setting up the stage for production of black water (as per the recent guidelines of FDEP)

I am also forwarding to you copies of MOR submitted by Aloha utilities to FDEP, which shows unsatisfactory record entries and submission. Data that should be entered on a daily basis are submitted with one reading for the month, with a line starting from the 2nd day of the month to the last day. Does that mean that no data was collected from the 2nd to the 3^{1st} of May 1999 or that the same number 0.8 mg/L was the number obtained as the lowest residual disinfectant at remote point?

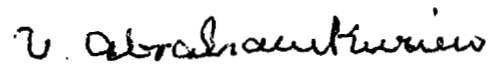
The CAC has attempted over a period of 3 months to get information from Aloha as to where and when this particular data is obtained to determine its relationship to flushing periods, but Aloha has not given a relevant answer so far.

One of the main reasons why customers are unwilling to stay with Aloha as its water provider is the Corporation's stonewalling attitude towards legitimate enquiry that will help to understand why the currently used process does not attain the maximum efficiency it is capable of. Our conclusion is that it is due to inadequate implementation of rigorous schedules and inadequate understanding of the meaning of data obtained resulting in no corrective actions being implemented expeditiously.

I hope you will share these documents with technical experts within the confines of the PSC. As part of the discovery process that will be undertaken for the evidentiary hearing, the customers and OPC will request more data from Aloha and FDEP.

If you have any further questions in this matter, please do not hesitate to contact me. I will be out of the country from April 26 to May 25th.

Yours sincerely,


V. Abraham Kurien, M.D.

cc. Atty Steve Burgess, OPC.

SAMPLE # 8
CLIENT: Ben Lovelace & Company

PUBLIC DRINKING WATER ANALYSIS FORM

PUBLIC WATER SYSTEM INFORMATION

NAME Aloha Utilities, Inc. ID# 6512214
ADDRESS 2514 Aloha Place PHONE# 937-4275
Holiday, Florida 34691
TYPE: C C=Community NTN= Nontransient Noncommunity N= Non Community

SAMPLE INFORMATION

SAMPLE DATE 5/12/94 SAMPLE TIME 2:30 P.M. LAB SAMPLE # see above

SAMPLE LOCATION: Well #9-27

SAMPLER NAME/PHONE# Bonita Lucas (813) 530-5615

SAMPLE TYPE: RW DIST=Distribution CL=Clearance DEP=Distribution Entry Point
RC=Recheck of MCL TMRT=THM Max Res Times RW=Raw
RLIS=Resample of Lab Invalidated Sample PT=Plant Tap CP=Composite

LAB CERTIFICATION INFORMATION

LAB NAME Haines Testing Laboratory, Inc. HRS#/EXPIRATION DATE #84123 6/94
ADDRESS 13285 62nd Street North Clearwater, FL 34620 PHONE (813) 530-5615

SUBCONTRACTED LAB HRS# GROUPS ANALYZED see below
KNL Laboratory Services #84252 & E84025
Micro Analytical Laboratories, Inc. #82436

ANALYSIS INFORMATION

DATE SAMPLES RECEIVED 5/12/94

GROUPS ANALYZED Complete 17-550

I, W.E. Haines do hereby Certify that all analytical data reported has been reviewed by me and to the best of my knowledge, is correct.

Signature

Title PRESIDENT

NO2= Nitrite SEC 14= Secondaries all 14
NO3= Nitrate PST= Pesticides & PCBs all 29
ASB= Asbestos GI= Group I Unregulated all 13
T= Turbidity GII= Group II Unregulated all 37
IN18= Inorganics all 18 RC= Radio chemicals
THM4= THMs all 4 VOC21= Volatile Organics all 21
P= Partial

COMPLIANCE INFORMATION

Sample Collection Satisfactory:

Resample Requested for:

Person notified to resample:

DER/ACPHU Reviewing Official:

Sample Analysis Satisfactory:

Reason:

Date Notified:

SAMPLE# 88927
 CLIENT: Ben Lovelace & Company

SECONDARY CHEMICAL ANALYSIS
 17-550.320
 (PWS031)

WELL 9

Parameter ID	NAME	Sample Number	Analysis Result (mg/l)	Analytical Method	Analysis Date
1002	Aluminum .2	88927	< 0.020	202.1	5/28/94
1017	Chloride 250	" "	4 <i>μ</i>	4500B	5/20/94
1022	Copper 1	" "	< 0.002	220.1	5/15/94
1025	Fluoride 2.0	" "	0.15	340.2	5/20/94
1028	Iron .3	" "	0.068	236.1	5/29/94
1032	Manganese .05	" "	0.005	243.1	5/18/94
1050	Silver .1	" "	< 0.005	272.2	6/14/94
1055	Sulfate 250	" "	10.3 <i>μ</i>	375.4	5/26/94
1095	Zinc 5	" "	0.004	289.1	5/15/94
1905	Color (color units) 15	" "	15 <i>μ</i>	110.2	5/12/94
1920	Odor (total odor number) 3	" "	< 1	140.1	5/12/94
1925	pH 6.8-8.5	" "	7.6	150.1	5/12/94
1930	Total Dissolved Solids 500	" "	265 <i>μ</i>	160.1	5/19/94
2905	Foaming Agents .5	" "	0.03	425.1	5/12/94

RADIOLOGICAL ANALYSIS
 17-550.310(5)
 (PWS033)

Parameter	Sample Number	Analysis Result (pCi/l)	Analytical Method	Analysis Error	Analysis Date
4000	Gross Alpha	2.0 ± 0.9	900.0		5/24/94
4012	Photon Emitters				
4020	Radium-226				
4030	Radium-228				
4100	Gross Beta				
4101	Man-made beta & photon emitters				
4102	Tritium				
4172	Strontium-89				
4174	Strontium-90				
4264	Iodine-131				
4270	Cesium-134				

HAINES TESTING LABORATORY, INC.

13245 67th STREET NORTH
CLEARWATER, FLORIDA 34620

June 24, 1994

TELEPHONE (813)330-3815

REPORT NO. BR927

FOR: Ben Lovelace & Company
6501 Orient Road
Tampa, FL 33610

ANALYSIS: CHLORINE DEMAND

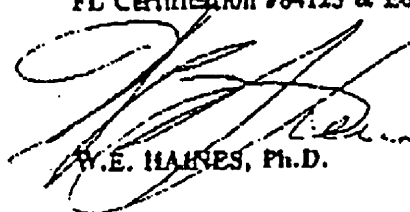
SAMPLE MARKINGS: Water sample taken 5/12/94 @ 2:30 P.M., received 5/12/94 @ 3:30 P.M.

LABORATORY FINDINGS

HYDROGEN SULFIDE 4.3
milligrams per liter

milligrams/liter (Dose)	pH after Dose	milligrams/liter CHLORINE DEMAND @ 1 Hour	pH @ 18 Hour Contact	milligrams/liter CHLORINE DEMAND @ 18 Hours
0	7.5		7.6	
10	7.7	> 10	7.7	> 10
15	7.7	14.7	7.8	14.6
20	7.7	17.5	7.8	18.2
25	7.8	20.9	7.9	21.1
30	7.85	20.2	7.95	20.6
40	8.1	19.1	8.05	22.0
50	8.2	18.1	8.1	22.0
Blank				
0	6.3		7.3	
1.0	6.8	0	7.7	0.00
2.0	7.2	0.15	7.7	0.10

HAINES TESTING LABORATORY, INC.
FL Certification #84123 & E84039



W.E. HAINES, Ph.D.

Monthly Operation Report for Public Water Systems that Use Ground Water and for Consecutive Public Water Systems that Treat Their Water

System PWS Identification Number: 6512214
 Treatment Plant Name: Seven Springs Well #4

III. SUMMARY OF DAILY WATER TREATMENT DATA FOR THE MONTH YEAR OF May 1999

- Type of Residual Disinfectant Maintained in Distribution System Served by Plant: free chlorine; combined chlorine (chloramine); chlorine dioxide
- Summary of Daily Water Treatment Data for Month:

Day of the Month	Hours Plant in Operation	Quantity of Finished Water Produced by Plant (gallons)	Lowest Residual Disinfectant Concentration at Entry to Distribution System (mg/L)	Residual Disinfectant in Distribution System			Reported Emergency or Abnormal Operating Conditions
				Lowest Residual Disinfectant Concentration at Remote Point (mg/L)	Number of Instances Where Residual Disinfectant Measurements Taken at Total Coliform Sampling Points	Lowest Residual Disinfectant Concentration at Total Coliform Sampling Points (mg/L)	
1	24	191000	2.1	0.8			
2		4163000	3.0				
3		494000	2.5				
4		450000	2.5				
5		692000	2.5				
6		343000	2.5		20*	0.8*	
7		263000	2.8				
8		270000	2.5				
9		270000	2.5				
10		472000	1.7				
11		353000	2.6				
12		633000	2.6				
13		576000	3.0				
14		484000	3.0				
15		494000	1.5				
16		796000	3.5				
17		752000	3.5				
18		523000	3.5				
19		519000	1.6				
20		347000	1.5				
21		24000	1.5				
22		208000	2.5				
23		365000	2.5				
24		298000	1.7				
25		285000	0.5				
26		372000	1.8				
27		244000	1.7				
28		211000	1.7				
29		442000	1.5				
30		481000	2.5				
31	✓	64000	2.2	✓	20*	1.49	
Total		12279000			20*		
Avg.		396096					
Max.		796000					

manually max 827,000
 7 max capability - 500 x 1440 = 720,000
 196