ORIGINAL

State of Florida

Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

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

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
COM
CTR
ECR
GCL
OPC
MMS
SEC 1
OTH

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

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

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 3rd 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

V. Abraham Kurien, M.D.

cc. Atty Steve Burgess, OPC.

SAMPLE # 8
CLIENT: Ben Lovelace & Company

PUBLIC DRINKING WATER ANALYSIS FORM

BLIC 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
NO3= Nitrate
ASB= Asbestos
T= Turbidity
IN18= Inorganics all 18
THM4= THMs all 4
P= Partial

SEC 14= Secondaries all 14
PST= Pesticides & PCBs all 29
GI= Group I Unregulateds all 13
GII= Group II Unregulateds all 37
RC= Radio chemicals
VOC21= Volatile Organics all 21

COMPLIANCE INFORMATION

Sample Collection Satisfactory:

Sample Analysis Satisfactory:

Resample Requested for:

Reason:

Person notified to resample:

Date Notified:

DER/ACPHU Reviewing Official:

SAMPLE# 88927
CLIENT: Ben Lovelace & Company

SECONDARY CHEMICAL ANALYSIS
17-550.320
(PWS031)

WELL 9

Parameter ID	NAME	Sample Number	Analysis Result (mg/l) WELL 9	Analytical Method	Analysis Date
1002	Aluminum .2	88927	< 0.020	202.1	5/26/94
1017	Chloride 250	" "	4	4500B	5/20/94
1022	Copper /	" "	< 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	375.4	5/26/94
1095	Zinc 5	" "	0.004	289.1	5/15/94
1905	Color (color units) 15	" "	15	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	160.1	5/19/94
2905	Foaming Agents 1.5	" "	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	88927	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.

13295 62nd STREET NORTH
CLEARWATER, FLORIDA 34620

June 24, 1994

TELEPHONE (813)530-3815

REPORT NO 88927

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.

jd

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 #9

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)	Residual Disinfectant In Distribution System: Lowest Residual Disinfectant Concentration at Entry to Distribution System (mg/L)	Residual Disinfectant In Distribution System: Lowest Residual Disinfectant Concentration at Remote Point (mg/L)	Residual Disinfectant In Distribution System: Number of Instances Where Residual Disinfectant Measurements Taken at Total Coliform Sampling Points	Residual Disinfectant In Distribution System: Lowest Residual Disinfectant Concentration at Total Coliform Sampling Points (mg/L)	Reported Emergency or Abnormal Operating Conditions
1	24	191000	2.1	0.8			
2		416000	3.0				
3		494000	2.5				
4		450000	2.5				
5		592000	2.5		20*	0.8*	
6		343000	2.5				
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	↓		1.49	
Total		12279000			20*		
Avg.		396096					
Max.		796000					

monthly max ? max capability - 500 x 1440 = 720,000