ORIGINAL

050587-WS

Maltese Developments, Inc

MSM Land Investments LLC
Rio Villa Lakes LLC
Hunter Creek Estates LLC
Waterfront Homes of Charlotte LLC
MSM Utilities LLC

September 2, 2005

Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0870

Re: Application for Staff Assisted Rate Case

Dear Ms. Bayo:

Enclosed please find an "Application for Staff Assisted Rate Case" for MSM Utilities, LLC (MSM) in Charlotte County.

In support of its eligibility, MSM provides the following additional relevant information:

1) This utility has been in operation since 1982. It has been operating under the jurisdiction of the Commission since 1994. The certificates and assets were transferred to MSM, effective January 18, 2005, per Order No. PSC-05-0147-PAA-WS. MSM has maintained the records of the utility since transfer and has in its possession the supporting documentation for all transactions that have occurred in 2005.
2) The Annual Report for 1994 was filed by the prior owner. The support for revenues and expenses in 1994 or any portion thereof, are in the possession of the prior owner or its consultant, to the extent that they exist. If any such information is needed by the Commission to process this application, MSM will diligently attempt to obtain it. Even without that input, MSM should be able to provide such information with regard to expenses that are not affected by the change in ownership, such as power, chemical, plant operations, sludge removal, etc.
3) According to the 2004 Annual Report, the utility operated at a loss of $60,005 under its prior ownership. After eight months of operation in 2005, MSM's operating loss is $59,958 and is projected to be approximately $90,000 for all of 2005.

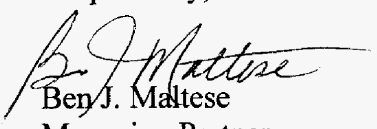
9696 Bonita Beach Road, Suite 210 • Bonita Springs, FL 34135 • (239) 444-1444 • Fax (239) 444-1445

4) MSM contends that the information currently available regarding operating costs in 2005, and that will be available to the Commission by the time it undertakes its audit, will be sufficient to support the need for an increase in rates and to set rates for the future. The information that MSM will make available to the Commission staff will allow it to make the proper pro forma adjustments to recognize the current and ongoing costs of management and supervision and corrective and preventive maintenance being undertaken on behalf of its customers.

Due to the extent of the operating losses being incurred by MSM, time is of the essence in submitting this application. I look forward to working with you on this request. Please do not hesitate to contact me should you need additional information or have any questions.

Thank you for your consideration of the request.

Respectfully,



Ben J. Maltese
Managing Partner

Enclosure

FLORIDA PUBLIC SERVICE COMMISSION

APPLICATION FOR A
STAFF ASSISTED RATE CASE

I. General Data

A. Name of Utility: MSM Utilities, LLC

B. Address: 9696 Bonita Beach Road, Suite 210, Bonita Springs, FL 34135

1. Telephone Nos. (239) 444-1444; Fax: (239) 444-1445

2. County Charlotte Nearest City Punta Gorda

3. General Area Served The Oaks at Rivers Edge and vicinity

C. Authority

1. Water Certificate No. 611-W Date Received 1/18/2005

2. Wastewater Certificate No. 527-S Date Received 1/18/2005

3. Date utility started operations: Water 1982 Wastewater 1982

D. How system was acquired: Purchase of Assets

If utility was purchased, give date 12/31/2004 Amount paid $229,000

1. Name of Seller Ernest E. And Zola M. MacLachlan Revocable Trusts

2. Was seller affiliated with present owners? No

3. Did you purchase Stock No or assets only Yes

E. Type of legal entity: Corporation, Partnership or Sole Proprietorship Limited Liability Company

F. Owners & Officers

Name	Title	Percent Ownership
1. Ben J. Maltese	Trustee, Ben J. Maltese Revocable Trust dated 9/9/97	30%
2. Gerald G. Mansour	Trustee, Gerald G. Mansour Revocable Trust dated 11/18/91	15%
3. Gerald J. Mansour	Trustee, Gerald J. Mansour Revocable Trust dated 10/06/83	15%
4. Ghassan M. Saab	Trustee, Ghassan M. Saab Revocable Trust dated 2/16/87	15%
5. Khalil Saab	Trustee, Khalil Saab Revocable Trust dated 10/10/94	25%

G. List of Associated Companies and Addresses

1. MSM Land Investments LLC , 9696 Bonita Beach Road, Suite 210, Bonita Springs, FL 34135

2 Waterfront Homes of Charlotte LLC, 9696 Bonita Beach Road, Suite 210, Bonita Springs, FL 34135

H. If you have retained an attorney and/or a consultant to represent the utility for this application, Furnish the name(s) and address(es):

Frank Seidman, Management & Regulatory Consultants, Inc., P.O. Box 13427, Tallahassee, FL 312317

Gerald T. Buhr, Esq., Buhr & Associates, P.A., 1519 Dale Mabry Highway, Suite 100, Lutz, FL 33548

II. Accounting Data

A. Outside Accountant

1. Name: Garland Campbell

2. Firm:

3. Address: Santa Barbara Road
Naples, FL

4. Telephone: 239-348-3829

B. Individual to contact on accounting matters:

1. Name Nancy Krawczk

2. Telephone (239) 444-1444

C. Location of books and records 9696 Bonita Beach Road, Suite 210, Bonita Springs, FL 34135

D. Have you filed an Annual Report with the Commission? The Annual Report for 2004 was filed by the previous owner in accordance with Order No. PSC-05-0147-PAA-WS.

Date Last Filed : June 2005

E. Has your last semiannual regulatory assessment fee payment been made (January 30 or July 30 Which ever is applicable? N/A

F. Basic Rate Base Data (Most recent two years)

1. Water	2004	2003
Cost of Plant in Service:	$ 386,243	$ 379,171
Less Accumulated Depreciation:	$ (247,695)	$(128,219)
Less Contributed Plant (net):	$ (53,274)	$ (55,568)
Net Owner's Investment:	$ 85,274	$ 195,384

2. Wastewater	2004	2003
Cost of Plant in Service:	$ 188,366	$ 188,366
Less Accumulated Depreciation:	$ (128,230)	$(101,246)
Less Contributed Plant (net):	$ (36,136)	$ (44,478)
Net Owner's Investment:	$ 24,000	$ 42,642

G. Basic Income Statement (Most recent two years):

1. Water	2004	2003
Revenues (By Class):		
a. Residential	$ 9,567	$ 10,023
b. Commercial		
c. Other		
Total Operating Revenues:	$ 9,567	$ 10,023
Less Expenses:		
a. Salaries & Wages - Employees	$ 3,510	$ 2,656
b. Salaries & Wages - Officers, Directors, & Majority Stockholders		
c. Employee Pensions & Benefits		
d. Purchased Water		
e. Purchased Power	2,090	1,737
f. Fuel for Power Production		
g. Chemicals	1,468	2,155
h. Materials & Supplies	1,616	883
i. Contractual Services	19,403	13,707
j. Rents	600	600
k. Transportation Expenses	601	
l. Insurance Expense	2,316	1,983
m.Regulatory Commission Expense		
n. Bad Debt Expense		
o. Miscellaneous Expense	76	775
p. Depreciation Expense (net)	9,567	8,645
q. Property Taxes	2,179	1,752
r. Other Taxes	822	451
s. Income Taxes		
Operating Income (Loss)	$ (34,681)	$ (25,321)

G. Basic Income Statement (Most recent two years):

2. Wastewater	2004	2003
Revenues (By Class):		
a. Residential	$ 6,249	$ 6,546
b. Commercial		
c. Other		
Total Operating Revenues:	$ 6,249	$ 6,546
Less Expenses:		
a. Salaries & Wages - Employees	$ 3,510	$ 2,656
b. Salaries & Wages - Officers, Directors, & Majority Stockholders		
c. Employee Pensions & Benefits		
d. Purchased Wastewater Treatment		
e. Sludge Removal Expense	1,564	183
f. Purchased Power	2,089	1,737
g. Fuel for Power Production		
h. Chemicals	1,468	2,154
i. Materials & Supplies	1,615	883
j. Contractual Services	19,400	13,706
j. Rents	600	600
l. Transportation Expenses	600	
m. Insurance Expense	2,316	1,983
n.Regulatory Commission Expense		

o. Bad Debt Expense		
p. Miscellaneous Expense	75	775
q. Depreciation Expense (net)	1,000	2,305
r. Property Taxes	946	608
s. Other Taxes	672	295
t. Income Taxes		
Operating Income (Loss)	$ (29,606)	$ (21,339)

H. Outstanding Debt: None

MSM Land Investments makes cash advances to MSM Utilities. Both companies have the same partners and partnership structure.

I. Indicate Type of Tax Return Files:
MSM Utilities is in the first year of operation and therefore no tax returns have been filed.

_____ Form 1120 - Corporation

_____ Form 1120S - Subchapter S Corporation

__x__ Form 1065 - Partnership

_____ Form 1040 - Schedule C - Individual (Proprietorship)

III. Engineering Data

A. Outside Engineering Consultant:

1. Name William J. Murchie
2. Firm A M Engineering, Inc.
3. Address 6320 Tower Lane, Sarasota, FL 34240-8809
4. Telephone (941) 377-9178

B. Individual to contact on engineering matters:

1. Name Ben Maltese
2. Telephone (239) 444-1444

C. Is the utility under citation by the Department of Environmental Protection (DEP) or County Health Department? No. If yes, explain.

D. List any known service deficiencies and steps taken to remedy problems.
See attached communications

E. Name of plant operator(s) and DEP operator certificate numbers(s) held.
Thompson – Moss, Inc. - Tela Thompson #0008652 WW
Aqua USA, Inc. - Susanna Haslinger # 0006822 DW

F. Is the utility serving customers outside of its certificated area? No
If yes, explain.

G. Wastewater:

1. Gallons per day capacity of treatment facilities existing 15,000 GPD
   Under construction None Proposed Replace existing system with 60,000 GPD system when needed (approx. 2 years).

2. Type and make of present treatment facilities Unknown

3. Approximate average daily flow of treatment effluent 5,500 GPD (2004)

4. Approximate length of wastewater mains:

   Size (diameter) 8" PVC
   Linear feet 4,750

5. Number of manholes 18

6. Number of Lift Stations 1

7. How do you measure treatment plant effluent?
   Plant is a plug flow design – that is, what goes in, goes out. Flow is determined by pump hourly meters on the influent side.

8. Is the treatment plant effluent chlorinated? Yes If yes, what is the normal dosage rate?
   The required Florida Department of Environmental Protection residual rate is : minimum .5mgk<avg. daily is 2.0 mgk.

9. Tap in fees - Wastewater $ -0-

10. Service availability fees - Wastewater $ -0-

11. DEP Treatment Plant Certificate Number and date of expiration date:
    Number FL0042412
    Expiration Date : December 16, 2009.

12. Total gallons treated during most recent twelve months:
    3.008 million gallons per year (3-5-04 to 3/5/05).

H. Water

1. Gallons per day capacity of treatment facilities existing: 40,000 GPD (R/O)
   Under construction: None Proposed: None

2. Type of treatment Reverse Osmosis

3. Approximate average daily flow of treated water : 6,000 gallons per day (.006 MGD)

4. Source of water supply: Wells

5. Types of chemicals used and their normal dosage rates: Chlorine Residual Avg. Is 2.0 mgk

6. Number of wells in service 2 Total capacity in gallons per minute (GPM)
   100 gpm

7. Reservoirs and/or hydropneumatic tanks:

Description Concrete
Capacity 6 - 5,000 gal tanks

8. High service pumping:

Motor horsepower	15	15
Pump Capacity (gpm)	275	275

9. How do you measure treatment plant production? High Service Pump Flow Meter.

10. Approximate feet of water mains:

Size (diameter) 6" PVC
Linear feet 4,770

11. Note any fire flow requirements and imposing government agency: Fire Department requires fire hydrants.

12. Number of fire hydrants in service 3

13. Do you have a meter change out program? Yes

14. Meter installation or tap in fees - Water $ -0-

15. Service availability fees - Water $ -0-

16. Has the existing treatment facility been approved by DEP? Yes. ID# 608-4074

17. Total gallons pumped during most recent twelve months : 2,124,155
Includes gallons pumped as reported by previous owner July – December 2004.

18. Total gallons sold during most recent twelve months: 1,549,242
Reflects January – July of operation under MSM Utilities and August – December 2004 from previous owner's monthly reports.

19. Gallons unaccounted for during most recent twelve months: 574,913

20. Gallons purchased during most recent twelve months: 0

IV. Rate Data

A. Individual to contact on tariff matters:

1. Name Ben Maltese

2. Telephone (239) 444-1444

B. Schedule of present rates (Attach additional sheets if more space is needed:

1. Water

a. Residential Water	$10.50/mo + 0-5kgal @ $3.25; 5-8kgal @ $4.88; over 8kgal @ $7.32
b. General Service	None
c. Special contract	None
d. Other	None

2. Wastewater

a. Residential Wastewater $6.50/mo + $2.50/kgal; 10kgal max
b. General Service None
c. Special contract None
d. Other none

C. Number of customers (Most recent two years)

1. Water Metered	2004	2003
a. Residential	48	48
b. General Service		
c. Special contract		
d. Other - specify		

2. Water Unmetered	2004	2003
a. Residential	2	2
b. General Service		
c. Special contract		
d. Other - specify		

3. Wastewater	2004	2003
a. Residential	50	50
b. General Service		
c. Special contract		
d. Other - specify		

V. Affirmation

I, Ben J. Maltese, the undersigned owner, officer, or partner of the above named Public utility, doing business in the State of Florida and subject to the control and jurisdiction of the Florida Public Service Commission, certify that the statements set forth herein are true and correct to the best of my information, knowledge and belief.

Signed _____

Title : Managing Partner

Notice: Section 837.06, Florida Statutes, provides that any person who knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his duty shall be guilty of a misdemeanor of the second degree.

Maltese Developments, Inc
MSM Land Investments LLC
Rio Villa Lakes LLC
Hunter Creek Estates LLC
Waterfront Homes of Charlotte LLC
MSM Utilities LLC

June 9, 2005

VIA FACSIMILE

Mr. Keith Kleinmann
Environmental Manager
Department of Environmental Protection
P.O. Box 2549
Fort Myers, FL 3390

Re: Charlotte County-DW
Oaks at River's Edge WWTP
FLA014062

Dear Mr. Kleinmann;

The following is a response to your communication of May 25, 2005 notice of deficiencies cited as a result of department personnel site visit on May 12, 2005:

1. We are attempting to contact the previous operator in order to locate this report. As you know, we took over ownership and operation of the utility in January 2005 and began negotiating a contract for a new operator. This report may have been missed in the transition.
2. Noted. As this deficiency occurred under the previous owner and operator it is our intention to comply with applicable statutes and/or rules.
3. Noted. As this deficiency occurred under the previous owner and operator it is our intention to comply with applicable statutes and/or rules.
4. A second unit is housed in the utility storage room. Section VI (8) notes that installation is due prior to renewal of the operations permit and/or at the time of plant expansion…Please advise if we are misinterpreting this section.
5. The operators log has the lime stabilization pHs and sludge hauling dates recorded in the back of the log book. A multi-color tab has been inserted to note the specific section.
6. We are in the process of extending the pipes to prevent excessive splashing from the RAS line, scum removal line and the influent line located in the first tank.
7. Subparagraph(s):
    a. the spare blower is located in utility storage room on site (see response 4 above).
    b. the digester had been decanted and lime stabilized. The hauler was scheduled to pick up on May 12, 2005.
    c. the second baffled chamber had an accumulation of solids as noted by FDEP. After the digester was pumped out by the hauler the CCC was pumped down, walls pressure washed, and two (2) leaks from the clarifier were found. The leaks were below the invert of the pipe. Repairs were made to the wall and the CCC was placed back in service after three (3) hours.

Sincerely,

Ben J. Maltese
Managing Partner

COPY

WWTP MALFUNCTION/ABNORMAL EVENT REPORT

Please note for accordance with the Florida Administrative Code (F.A.C.) Rules on back. This form is provided for your convenience only. You may complete this form and FAX it to the Wastewater Section at (941) 332-6969. If spill is greater than 000 gallons you MUST call State Warning Point at 1-800-320-0519.

FACILTY NAME: MSM Utilities COUNTY: Charlotte
REPORTED BY: Tera Thompson WW [illegible] (941 286 7081) PHONE: 941-637-5757 (on-site)
PERMIT NUMBER: FLA014062-001-DW3 METHOD OF CONTACT:

DEP: ☒	Date:	5-12-05	Time:	4 PM Thursday	Person contacted:	EJ Jackson
State Warning Point: ☐	Date:		Time:		Person contacted:	
Other: ☐	Date:		Time:		Person contacted:	
Other: ☐	Date:		Time:		Person contacted:	

UPSET/MALFUNCTION/SPILL

Type of Spill	Source		Discharge Destination
☐ Raw wastewater	☐ Lift station # ____	☐ Surge Tank	☐ storm water
☐ Effluent	☐ Line Break	☐ Aeration Tank	☐ surface water ____
☒ Mixed Liquor	☐ Filter	☒ Clarifier	☐ groundwater
☐ Sludge	☐ Disposal System	☐ Digestor	☐ on ground
☐ Other* ____	☐ Other* ____	☐ Other* ____	☒ Other Chlorine contact Chamber 3 baffle Chambers, Sludge contained in 2ND Chamber

Amount of Discharge (1) [illegible] total gallons OR (2) ____ gallons/minute for ____ minutes/hours

Physical location/ address/ other reference:

MALFUNCTION/CAUSE

☐ Power Outage	☐ RAS Line	Weather	
☐ Pump Failure	☒ Leak	☐ Lightning	
☐ Disinfection System Failure	☐ Switch/Timer Failure	☐ Heavy Rainfall	
☐ Clarifier Failure	☐ Filtration System Problem	☐ High Winds	
☐ Filter Bypass	☐ Clog or blockage	☐ Tropical Storm: ____	
☐ Blower Failure	☐ Failure	☐ Hurricane: ____	
☐ Other* ____			

Explain: Leak detected below invert of Clarifier discharge pipe into the Chlorine Contact Chamber.

EFFLUENT LIMIT VIOLATIONS

☐ Cl_2 ____ mg/L	☐ Turbidity ____ NTU	☐ pH ____
☐ TSS ____ mg/L	☐ NO_3 ____ mg/L	☐ $CBOD_5$ ____ mg/L
☐ Other* ____	☐ fecal coliforms ____	☐ Abnormal Flow ____ MGD

CORRECTIVE / REMEDIAL ACTION BEING TAKEN

☐ Auxiliary Power System On-Line	☐ Back-Up On-Line	☐ Notified Local Authorities
☐ Disinfect with	☐ Samples Taken	☐ Notified State Warning Point
☐ Bypass	☐ Restore Power	☒ Notified DEP by phone and EJ Jackson told MSM Utilities Project Manager of Sludge in 2ND baffle Chamber of the contact tank
☐ Containment	☐ Replace Equipment/Supplies	
☐ Other* Pumped Sludge from	☐ VAC Truck/Destination ____	

Estimated Time for Completion of Repairs: Soon

*Please explain in detail in the line provided.

Chlorine Contact Chamber to Digester, pressure washed walls found two leaks from the Clarifier below the invert of the pipe. Used hydraulic cement to repair leaks.

COPY

Department of Environmental Protection

Jeb Bush
Governor

South District
P.O. Box 2549
Fort Myers, Florida 33902-2549
Ph. (239) 332-6975
Fax (239) 332-6969

Colleen M. Castille
Secretary

~~May 25~~, 2005

03/04/05 - TMI

Ben J. Maltese
Managing Member
MSM Utilities, LLC
9696 Bonita Beach Rd. Suite 210
Bonita Springs, FL 34135

RE: Charlotte County-DW
Oaks at Rivers Edge WWTP
FLA014062

Dear Mr. Maltese:

A file review and a field inspection of the above referenced WWTP on May 12, 2005 indicate that you may be in violation of Chapter 403, Florida Statutes and the rules promulgated thereunder. Department personnel observed the following:

1. **A review of Department files indicates that the February 2005 discharge monitoring reports (DMR) was not received by the Department.** Florida Administrative Code (F.A.C.) Rule 62-601.300(1)(b) states parts A and B of DEP Form 62-620.910(10) shall be completed and submitted on a monthly basis and in a timely manner so as to be received by the appropriate District Office of the Department by the twenty-eighth (28th) of the month following the month of operation.

2. **A review of the August and December 2004 DMRs indicates that the flow percentages were not reported on the DMRs.**

3. **A review of the June, August, and September 2004 DMRs indicated that nitrate violations of 23.6, 14.1, and 20.6 mg/L respectively were reported on the DMRs.** F.A.C. Rule 62-610.510(1) states that at a minimum, preapplication waste treatment shall result in a reclaimed water meeting secondary treatment and basic disinfection levels prior to spreading into the rapid infiltration basins or absorption field system. The nitrate concentration in the applied reclaimed water **shall not exceed 12 mg/L** (as nitrogen) unless reasonable assurance is provided in the engineering report that nitrate as measured in any hydraulically down-gradient monitoring well located at the edge of the zone of discharge established in accordance with Rule 62-522.600, F.A.C., will not exceed 10 mg/L or background levels in the

Continued . . .

THOMPSON - MOSS INC.
P.O. BOX 494746 - PORT CHARLOTTE, FLORIDA 33949-4746
PHONE 941.286.7081

June 7, 2005

Ben J. Maltese
Managing Member
MSM Utilities, LLC
9696 Bonita Beach Rd. Suite 210
Bonita Springs, FL 34135

RE: FDEP File Review and Field Inspection Memo of May 25, 2005

Dear Mr. Maltese:

The following remarks are in response to the DEP memo of May 25, 2005 for Items numbered 1 through 7 of the referenced memo (copy enclosed).

1. Water Technology Inc. Gregor St John was the operator of record for February 2005.
2. Water Technology Inc. Gregor St John was the operator of record August & December 2004.
3. Water Technology Inc. Gregor St John was the operator of record June, August & September 2004.
4. A secondunit is housed in the Utility storage room.
5. The operators log has the lime stabilization pHs and sludge hauling dates recorded in the back of the log book. A multi-color tab has been inserted to show the specific section.
6. MSM Utilities is in process of extending the pipes to prevent excessive splashing from the RAS line, scum removal line and the influent line located in the first tank.
7. Subparagraph A: The spare blower is located in Utility storage room on site.
   Subparagraph B: The digester had been decanted and lime stabilized. The hauler was scheduled to pick up on May 12, 2005.
   Subparagraph C: The second baffled chamber had an accumulation of solids as found by FDEP. After the digester was pumped out by the hauler the CCC was pumped down walls pressure washed and two (2) leaks from the Clarifier were found. The leaks were below the invert of the pipe. Repairs were made to the wall and the CCC was placed back in service after three (3) hours.

If I can be of further assistance to you in this matter, please contact me at 941.286.7081.

Sincerely,

Tela A. Thompson

Tela A. Thompson
Thompson - Moss Inc.

Cc: MSM Project Manager
File
/tat

Duties of Operators. F.A.C. 62-602.650(3)(3) Report to the permittee or supplier of water and the Department and, if applicable, the local regulatory agency, as soon as possible, but within 24 hours following the discovery of any serious plant breakdown or condition causing or likely to cause:

(a) Unsafe treatment plant operation, or

(b) Any discharge of water or wastewater not in accordance with Chapters 62-550, 62-555, F.A.C., or the facility's permit, or

(c) Any major interruption in service.

Abnormal Events. 62-604.550

(1) In the event of equipment breakdown, power outages, destruction by hazard or fire, wind, or by other cause, the permittee shall notify the Department and the local program (where existing) when the above described abnormal events result in the disposal of inadequately treated waste in violation of Rule 62-604.130(1), F.A.C. Notification shall be made in person, by telephone, or by telegraph to the nearest office of the Department and the local program within 24 hours of breakdown or malfunction.

(2) A written report shall be required by the appropriate district office or local program within 72 hours of the notification referenced in (1), above. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its recurrence, and the time when the wastewater facility is expected to be properly operating.

(3) Following any event described in (1) above, the Department or the local program may require the permittee to provide, within 90 days, an acceptable contingency plan for preventing the recurrence of similar events and for minimizing their impacts should they reoccur.

62-620.610(20) General Conditions for All Permits.

a) The permittee shall report to the Department any noncompliance, which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and time, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

(b) The following shall be included as information which must be reported within 24 hours under this condition:

1. Any unanticipated bypass which causes any reclaimed water or the effluent to exceed any permit limitation or results in an unpermitted discharge.
2. Any upset which causes any reclaimed water or the effluent to exceed any limitation in the permit.
3. Violation of a maximum daily discharge limitation for any of the pollutants specifically listed in the permit for such notice, and
4. Any unauthorized discharge to surface or ground waters.

(c) If the oral report has been received within 24 hours, the noncompliance has been corrected, and the noncompliance did not endanger health or the environment, the Department shall waive the written report.

21.) The permittee shall report all instances of noncompliance not reported under conditions (18) or (19) of this permit at the time monitoring reports are submitted. This report shall contain the same information required by condition (20) of this permit.

d) Bypass Provisions.

1. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless the permittee affirmatively demonstrates that:
   i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and,
   2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and,
   3. The permittee submitted notices as required under condition (22)(b) of this permit.
   4. If the permittee knows in advance of the need for a bypass, it shall submit prior notice to the Department, if possible at least 10 days before the date of the bypass. The permittee shall submit notice of an unanticipated bypass within 24 hours of learning about the bypass as required in condition (20) of this permit. A notice shall include a description of the bypass and its cause; the period of the bypass, including exact dates and times; if the bypass has not been corrected, the anticipated time it is expected to continue; and the steps taken or planned to reduce, eliminate, and prevent recurrence of the bypass.

(c) The Department shall approve an anticipated bypass, after considering its adverse effect, if the permittee demonstrates that it will meet the three conditions listed in condition (22)(a)1. through 3. of this permit.

(f) A permittee may allow any bypass to occur which does not cause reclaimed water or effluent limitations to be exceeded if it is for essential maintenance to assure efficient operation. These bypasses are not subject to the provision of condition (22)(a) through (c) of this permit.

23) Upset Provisions.

(a) A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An upset occurred and that the permittee can identify the cause(s) of the upset;
2. The permitted facility was at the time being properly operated;
3. The permittee submitted notice of the upset as required in condition (20) of this permit; and
4. The permittee complied with any remedial measures required under condition (5) of this permit. (b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

(b) Before an enforcement proceeding is instituted, no representation made during the Department review of a claim that noncompliance was caused by an upset final agency action subject to judicial review.

You are advised that any activity that may contribute to violations of the above described statutes and rules should cease immediately. Continued operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties pursuant to Sections 403.141 and 403.161, Florida Statutes.

Please notify the Department in writing within 15 days as to what actions you intend to take in order to address these deficiencies.

If you have any questions, please do not hesitate to contact **Doug Wells** at **(239) 332-6975, ext. 108.** *Your cooperation is appreciated.*

Sincerely,

Keith Kleinmann
Environmental Manager

KK/WDW/EJ/mv

cc: Tela Thompson, Operator
Allen Slater, FRWA (allen.slater@frwa.net)

receiving ground water, whichever is less stringent. Design nitrate content of the reclaimed water prior to reuse shall be established by the permittee subject to Department approval. Additional treatment may be required as a result of the pond location, subsurface drainage, and hydraulic loading rate provisions contained below.

4. **During the inspection, Department personnel observed that a second blower was not installed at the WWTP.** Permit Condition VI.1.8. requires the installation of a second blower-motor assembly so that these backup components are on line for immediate use. Once on line these units can be used alternatively with the other unit installed providing assurance that blower-motor assemblies are operable.

5. **A review of the facility's onsite operators log indicated that lime stabilization pHs and sludge hauling dates were not recorded in the certified operator' log book.** F.A.C. Rule 62-601.300(6) states that the owner shall retain treatment facility operating records for the preceding five (5) calendar years and operators must maintain an operation and maintenance log for each plant, on-site in a location accessible to 24-hour inspection by Department personnel, protected from weather damage, and current to the last operation and maintenance performed. The log shall be maintained in books or electronically for facilities that require more than 6 hours per day of operator attendance. The log shall contain a minimum of 12 months of data at all times. The log shall include the identification of the plant, the signature and certification number of the operator(s) and the signature of the person(s) making any entries, date and time in and out, specific operation and maintenance activities, tests performed and samples taken, and major repairs made, and performance of preventive maintenance and either repairs or requests for repair of the equipment to keep the treatment plant operating as required by sections 468.541 and 468.543, F.S.

6. **During the inspection, Department personnel observed that there was excessive splashing from the return activated sludge (RAS) line causing wastewater to be discharged onto the plant grounds.** Florida Administrative Code (F.A.C.) Rule 62-600.740(2)(a) which states that the release or disposal of excreta, sewage, or other wastewaters or domestic wastewater residuals without providing proper treatment is prohibited.

7. The following observations were made by Department personnel which violate F.A.C. Rule 62-600.410(6) which requires that all facilities and equipment necessary for the treatment, reuse, and disposal of domestic wastewater or domestic wastewater residuals shall be maintained at a minimum, so as to function as intended.

   a. There was no spare blower on site.
   b. The digester was full as such the facility did not have the ability to waste.
   c. There was an accumulation of solids in the chlorine contact chamber (CCC).

Department of Environmental Protection

Jeb Bush
Governor

South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

Colleen M. Castille
Secretary

February 23, 2005

Mr. Ben Maltese
MSM Utilities, LLC
9696 Bonita Springs Road, Ste 210
Bonita Springs FL 34135

Re: Charlotte County - PW
Rivers Edge WTP
PWS I.D. Number: 6084074
Sanitary Survey Report

Dear Mr. Maltese:

Enclosed is your copy of the recently completed Sanitary Survey Report for the referenced public drinking water system.

The deficiencies listed in the Report may be a violation of Rule 62-555 F.A.C. Preventative maintenance programs per 62-555.350(2), F.A.C. were required to have been in place as of August 28, 2003 when the rule revisions went into effect. The equipment manufacturer's recommendations or a written preventive maintenance program was to have been established by the supplier of water for electrical or mechanical equipment, including exercising of isolation valves. A written flushing program for dead end mains was to have been established by the supplier of water. Dead-end water mains conveying finished drinking water were to be flushed quarterly or in accordance with a frequency in a written flushing program. Documentation of exercising valves and flushing dead end mains were to be maintained. The system is to submit documentation to the Department within 30 days of the date of this letter that the programs are in place or be subject to possible enforcement action.

For the other deficiencies, correct them as soon as possible and notify the Department in writing postmarked no later than April 11, 2005 indicating which deficiencies have been corrected. For those deficiencies that have not been corrected, indicate how and on what schedule the system will address the deficiencies noted in the report.

If and when the system exceeds 150 service connections or a population greater than 350, the system will be required to have standby power per 62-555.320(14). Enclosed is a copy of the rule.

Comments are included in the Report.

If you have any questions, please contact me at the letterhead address, call 941-332-6975, extension 119 or e-mail me at Raymond.Kenney@dep.state.fl.us. Please include the system name and PWS I.D number with all correspondence.

Sincerely,

Raymond W. Kenney
Engineer II

RWK
Enclosures
cc: Ms. Peggy Ray (w/encs)
Mr. Gregor St. John (w/encs)

State of Florida
Department of Environmental Protection
South District - Fort Myers Office

SANITARY SURVEY REPORT

Plant Name RIVERS EDGE County Charlotte PWS ID # 6084074
Plant Location Wood Duck Dr, Punta Gorda 33982 Phone
Owner Name MSM Utilities, LLC; Attn: Ben Maltese Phone (239) 444-1444
Owner Address 9696 Bonita Beach Road, Suite 210, Bonita Springs Fl 34135
Contact Person Gregor St John Title Operator Phone (888) 834-2905
This Survey Date 2/10/05 Last Survey Date 2/6/02 Last C.I. Date 2/3/04

PWS TYPE & CLASS
☒ Community
☐ Non-transient Non-community
☐ Non-Community

PWS STATUS
☒ Approved system with approval number & date
WC08-194653
☐ Unapproved system

SERVICE AREA CHARACTERISTICS
Residential Community
Food Service: ☐ Yes ☐ No ☒ N/A

OPERATION & MAINTENANCE
Certified Operator: ☒ Yes ☐ No ☐ Not required
Operator(s) & Certification Class-Number
Gregor St John C 13300; Sue Haslinger C 6822
Albe Quednau C 7514
O & M Log: ☒ Yes ☐ No ☐ Not required
Operator Visitation Frequency
Required: 1 hr/day for 5 days/wk & visit each weekend day
Actual: 1 hr/day for 5 days/wk & visit each weekend day
Non-consecutive Days? ☐ Yes ☒ No ☐ N/A
MORs submitted regularly? ☒ Yes ☐ No ☐ N/A
Data missing from MORs? ☒ No ☐ Yes ☐ N/A

Number of Service Connections 36
Population Served 70 Basis MOR
Average Day (from MORs) 5,500 gpd
Max. Day (from MORs) 35,000 gpd
Max-day Design Capacity 45,000 gpd
Comments

RAW WATER SOURCE
☒ GROUND; Number of Wells 2
☐ SURFACE/UDI; Source
☐ PURCHASED from PWS ID #
☐ Emergency Water Source
Emergency Water Capacity

AUXILIARY POWER SOURCE
☐ Yes ☒ None ☒ Not Required
Source
Capacity of Standby (kW)
Switchover: ☐ Automatic ☐ Manual
Standby Plan: ☐ Yes ☐ No
Hrs Operated Under Load
What equipment does it operate?
☐ Well pumps
☐ High Service Pumps
☐ Treatment Equipment
Satisfy 1/2 max-day demand? ☐ Yes ☐ No ☐ Unk
Comments

TREATMENT PROCESSES IN USE
Reverse Osmosis; Degassifier; Anti-scale (AF 600)
Hypochlorination
What additional treatment is needed?
N/A
For control of what deficiencies?

DISTRIBUTION SYSTEM
Flow Measuring Device McCrometer Flow Meter
Meter Size & Type 4" Propeller
Backflow Prevention Devices: ☒ Yes ☐ No
Cross-connections None observed
Written Cross-connection Control Program: Yes
Coliform Sampling Plan: ☒ Yes ☐ No ☐ N/A
Comments

PWS ID # 6084074
Date 2/10/05

GROUND WATER SOURCE

Well Number		1	2		
Florida ID No		AAH9009	AAH9008		
Year Drilled		1980	1980		
Depth Drilled		230'	230'		
Drilling Method		Rotary	Rotary		
Type of Grout		Cement	Cement		
Static Water Level		3'	3'		
Pumping Water Level		---	---		
Design Well Yield		---	---		
Test Yield		---	---		
Actual Yield (if different than rated capacity)		---	---		
Strainer		---	---		
Length (outside casing)		125'	125'		
Diameter (outside casing)		4"	4"		
Material (outside casing)		PVC	PVC		
Well Contamination History		None	None		
Is inundation of well possible?		No	No		
6' X 6' X 4" Concrete Pad		Yes	Yes		
SET BACKS	Septic Tank	No	No		
	Reuse Water	No	No		
	WW Plumbing	No	No		
	Other Sanitary Hazard	None	None		
PUMP	Type	Submersible	Submersible		
	Manufacturer Name	Goulds	Goulds		
	Model Number	45T03	45T03		
	Rated Capacity (gpm)	50 GPM	40 GPM		
	Motor Horsepower	---	---		
Well casing 12" above grade?		Yes	Yes		
Well Casing Sanitary Seal		Yes	Yes		
Raw Water Sampling Tap		Yes	Yes		
Above Ground Check Valve		Yes	Yes		
Fence/Housing		Yes	Yes		
Well Vent Protection		Yes	Yes		

COMMENTS South well is # 1 - North well is # 2
The south well needs to be secured

PWS ID # 6084074
Date 2/10/05

CHLORINATION (Disinfection)
Type: ☐ Gas ☒ Hypo
Make Stenner 45M5 Capacity 50 gpd
Chlorine Feed Rate 3 gpd
Avg. Amount of Cl_2 gas used N/A
Chlorine Residuals: Plant 4.5 mg/l Remote 5.6 mg/l
Remote tap location: 1573 Condor Dr
DPD Test Kit: ☐ On-site ☒ With operator
☐ None ☐ Not Used Daily
Injection Points Bottom of aerator
Booster Pump Info
Comments

AERATION (Gases, Fe, & Mn Removal)
Type Degassifier (DeLouche) Capacity Unk
Aerator Condition OK
Bloodworm Presence None observed
Visible Algae Growth No
Protective Screen Condition OK
Comments

STORAGE FACILITIES
(G) Ground (H) Hydropneumatic (E) Elevated
(B) Bladder (C) Clearwell

Tank Type/Number	H	G (6)	
Capacity (gal)	5,000	5,000	
Material	Steel	Conc	
Gravity Drain	Yes	No	
By-pass Piping	Yes	Yes	
Pressure Gauge	Yes	N/A	
Sight Glass or Level Indicator	Yes	N/A	
Fittings for Sight Glass	Yes	N/A	
Protected Openings	Yes	Yes	
PRV/ARV	PRV	N/A	
On/Off Pressure	Yes	N/A	
Access Padlocked	No	No	

Comments The storage tanks need to be secured

HIGH SERVICE PUMPS

Pump Number	1	2	
Type	Cent.	Cent.	
Make	Goulds	Goulds	
Model	3656 2.5x3-7 6.75 imp	3656 2.5x3-7 6.75 imp	
Capacity (gpm)	270@150'	270@150'	
Motor HP	15	15	
Date Installed	2004	2004	
Maintenance	Monthly	Monthly	

Comments Plant pressure: 65 psi
Remote pressure 62 psi
Like for like pump replacement

PWS ID # 6084074
Date 2/10/05

DEFICIENCIES:

1. The south well needs to be secured. "Wellheads shall be enclosed by fences with lockable access gates, housed in lockable buildings or enclosures, or otherwise protected against tampering, vandalism, and sabotage." F.A.C. 62-555.315(1)

2. The exterior tanks need to be secured. "Drinking water treatment or pumping facilities shall be enclosed by fences with lockable access gates, housed in lockable buildings or enclosures, or otherwise protected to prevent tampering, vandalism, and sabotage. Finished-drinking-water storage facilities shall be enclosed by fences with lockable access gates, shall have lockable access openings and lockable cages or enclosures obstructing access to ladders, or shall be otherwise protected to prevent tampering, vandalism, and sabotage." F.A.C. 62-555.320(5)

3. If there are any dead end water mains they must be flushed quarterly or in accordance with a schedule in a written flushing program and a record of the flushing is to be maintained. The written flushing program needs to have a list of the dead end mains and identify on the list the location of the dead end water mains to be flushed and at what frequency each dead end main is to be flushed (quarterly or according to the frequency selected for the written flushing program). The quality of the water (e.g. disinfectant residual) should be the determining factor in selecting the frequency of flushing as well as the duration of the flush. An effective flushing program would document when the flushing was performed, the personnel performing the flushing, the before and after disinfectant residual, before and after water characteristics such as color, odor, etc. and any change made to the frequency or duration of the flushing. If hydrant flushing is performed it can also be incorporated into the written flushing program. The flushing records need to be maintained in such a manner that the supplier of water can determine when a dead end main is to be flushed and that it has been flushed in accordance with the frequency in the written flushing program. "Dead-end water mains conveying finished drinking water shall be flushed quarterly or in accordance with a written flushing program established by the supplier of water; additionally, dead-end or other water mains conveying finished water shall be flushed as necessary whenever legitimate water quality complaints are received." Rule 62-555.350(2) F.A.C. "All suppliers of water shall keep records documenting that ... their water mains conveying finished drinking water are being flushed, in accordance with subsection 62-555.350(2), F.A.C." Rule 62-555.350(12)(c) F.A.C.

4. Isolation valves, including those at the water treatment plant, must be exercised in accordance with the equipment manufacturer's recommendations or in accordance with a frequency in a written preventative maintenance program and a record of exercising the isolation valves is to be maintained. The program needs have a listing of the isolation valves with their location identified and an up-to-date map of the distribution system that shows the location of the isolation valves. The list of the isolation valves should identify at what frequency a particular valve is to be exercised. A record that the valve has been exercised must be maintained. An effective preventative maintenance valve-exercising program would document when the valve is to be (or was) exercised, who are the personnel performing the exercising, and in some instances the number of turns required to open and close the valve. The valve exercising records need to be maintained in such a manner that the supplier of water can determine when an isolation valve is to be exercised and that it has been exercised in accordance with the frequency in the written preventative maintenance valve-exercising program. "Preventive maintenance on electrical or mechanical equipment -- including...exercising of isolation valves -- shall be performed in accordance with the equipment manufacturer's recommendations or in accordance with a written preventive maintenance program established by the supplier of water." Rule 62-555.350(2) F.A.C. "All suppliers of water shall keep

records documenting that their isolation valves are being exercised…in accordance with subsection 62-555.350(2), F.A.C." Rule 62-555.350(12)(c) F.A.C.

COMMENTS:

1. An operation and maintenance manual is due to be completed by December 31, 2005. "Suppliers of water shall provide an operation and maintenance manual for each of their drinking water treatment plants by no later than December 31, 2005, and shall update the manual thereafter as necessary to reflect plant alterations and additions. The manual shall contain operation and control procedures, and preventive maintenance and repair procedures, for all plant equipment and shall be made available for reference at the plant or at a convenient location near the plant. Bound and indexed equipment manufacturer manuals shall be considered sufficient to meet the requirements of this subsection." F.A.C. 62-555.350(13)

2. "Finished-drinking-water storage tanks, including conventional hydropneumatic tanks with an access manhole but excluding bladder- or diaphragm-type hydropneumatic tanks without an access manhole,…shall be cleaned at least once every five years to remove biogrowths, calcium or iron/manganese deposits, and sludge from inside the tanks; and shall be inspected for structural and coating integrity at least once every five years by personnel under the responsible charge of a professional engineer licensed in Florida." Rule 62-555.350(2) F.A.C. "All suppliers of water shall keep records documenting that their finished-drinking-water storage tanks, including conventional hydropneumatic tanks with an access manhole but excluding bladder- or diaphragm-type hydropneumatic tanks without an access manhole, have been cleaned and inspected during the past five years in accordance with subsection 62-555.350(2), F.A.C." Rule 62-555.350(12)(c) F.A.C. Comment: Acceptable records documenting compliance with finished-water storage tank cleaning and inspection requirements should consist of bills/receipts for cleaning or inspection services and an inspection report. If a supplier of water uses its own staff to clean or inspect finished-water storage tanks, the supplier of water should keep, in lieu of bills/receipts for cleaning or inspection services, records indicating the date(s) of the cleaning or inspection, the staff involved in the cleaning or inspection, and the method(s) of cleaning. To document that a finished-water storage tank was indeed inspected under the responsible charge of a PE, the inspection report should be signed and sealed by the PE in responsible charge. (Furthermore, technical reports prepared under the responsible charge of a PE and submitted for record should be signed and sealed by the PE per FS 471.025 and FAC 61G15-23.002.) Generally, measurements using pit-depth gauges and ultrasonic thickness gauges should be made in addition to visual inspections when inspecting a finished-water storage tank for structural and coating integrity. However, it is up to the PE in responsible charge, who presumably has expertise in the design/construction/evaluation of structures and the application/evaluation of coatings, to decide exactly what must be done in order for him/her to make a professional determination regarding the structural and coating integrity of a finished-water storage tank.

RECOMMENDATIONS: None

Inspector: Raymond Kenney Raymond W Kenney Title Engineer II Date 2/23/05

Reviewed by James ~~Oni~~ Title ~~P.E. III~~ E III Date 2/23/05

62-555.320(14) Standby Power

(a) By no later than December 31, 2005, each community water system (CWS) serving, or designed to serve, 350 or more persons or 150 or more service connections shall provide standby power for operation of that portion of the system's water source, treatment, and pumping facilities necessary to deliver drinking water meeting all applicable primary or secondary standards at a rate at least equal to the average daily water demand for the system. If a CWS interconnects with another CWS to meet this requirement, the portion of the combined systems' components provided with standby power shall be sufficient to deliver water at a rate at least equal to the average daily water demand for the combined systems.

(b) Where standby power is required under paragraph (a) above, it shall be provided through:

1. connection to at least two independent power feeds from separate substations; or
2. one or more auxiliary power sources (i.e., generators or engines).

(c) Where standby power is required under paragraph (a) above and is provided through connection to independent power feeds from separate substations, the power feeds shall not be located in the same conduit or supported from the same utility pole and, if overhead power feeds are used, shall not cross or be located in an area where a single plausible occurrence (e.g., a fallen tree) could disrupt both power feeds.

(d) Where standby power is required under paragraph (a) above and is provided through an auxiliary power source, an in-place auxiliary power source is preferred. A portable auxiliary power source may be provided only if all of the following conditions are met:

1. A system to automatically start up the auxiliary power source and transfer electrical loads is not required under paragraph (e) below.
2. The supplier of water demonstrates that the water system has first priority for use of the portable auxiliary power source.
3. The supplier of water demonstrates that the portable auxiliary power source will at all times be in reasonably close proximity to (i.e., within 25 miles of) the water system components for which standby power is required.

(e) Where standby power is required under paragraph (a) above and the time delay required to manually transfer electrical loads from one power source to another could result in failure to maintain the minimum water distribution system pressure required under subsection 62-555.350(7), the supplier of water shall provide a system to automatically start up the auxiliary power source if an auxiliary power source is provided and to automatically transfer electrical loads.

(f) At each site where standby power is required under paragraph (a) above, the supplier of water shall provide by December 31, 2005, an audio-visual alarm system that is activated in the event any power source fails. If the site is not staffed during all hours the standby-powered water system components are in operation, the alarm also shall be telemetered to a place staffed during all hours the standby-powered water system components are in operation, or shall trigger an automatic telephone dialing or paging device, to enable notification of an authorized representative of the supplier of water.

Peggy Ray

From: Kenney, Raymond [Raymond.Kenney@dep.state.fl.us]
Sent: Monday, May 23, 2005 8:15 AM
To: Peggy Ray
Subject: RE: Rivers Edge Inspection Deficiencies

Peggy

I have a copy of a letter from Sue that the Department received on May 17, 2005. It was apparently misplaced in our office. Deficiencies
#1 and 2 have been corrected and deficiencies # 3 and 4 are being worked on and should be completed by the end of this month.

Ray Kenney
Florida DEP

-----Original Message-----
From: Peggy Ray [mailto:peggy@msminvest.com]
Sent: Wednesday, May 18, 2005 11:17 AM
To: Kenney, Raymond
Subject: RE: Rivers Edge Inspection Deficiencies

Ray,
I spoke to Susanna Haslinger and she said that she would be in contact with you regarding a written report on the deficiencies as well as the maintenance plan. Please let me know if you have not heard from her.

Also, I hope you can assist me in trying to find the proper noticing procedure. I couldn't find what I was looking for in our permit or Chapter 62.

On May 12 Ed Jackson, FDEP Wastewater Compliance officer found that sludge had seeped into the chlorine contact chamber - we found the crack and repairs were completed on May 14. What is the protocol for reporting this incident? Is this something our operator should be reporting?

Once again, I appreciate your guidance and assistance.

Peggy Ray
239-444-1444

-----Original Message-----
From: Kenney, Raymond [mailto:Raymond.Kenney@dep.state.fl.us]
Sent: Thursday, May 12, 2005 1:46 PM
To: Peggy Ray
Subject: RE: Rivers Edge Inspection Deficiencies

Peggy

We do not recommend any licensed operators but do maintain a list of operators and companies that can supply coverage.

Aqua U.S.A. Inc.
321 Granada Blvd
North Port, Fl 34287-1212

July 20, 2005

Department Of Environmental
Protection
P.O. Box 2549
Fort Myers, Florida 33902-2549

Re: Charlotte County – PW
Rivers Edge WTP
PWS I.D. Number 6084074

Dear Mr. Raymond W. Kenney

This is in answer to your Sanitary Survey Report of February 23, 2005.

The Deficiencies listed in #3 have been taken care of. Dead end mains have been located and flushed. An effective flushing program has been started.

The Deficiencies listed in #4 are still being worked on. We are still located all valves and exercising valves as located.

If I can be of any furth help, please do not hesitate to contact me.

I remain

Yours Truly
AQUA U.S.A. INC

S. Haslinger

Susanna Haslinger
Operator

copy