

DOCKET NO. 040384-WS - Application for Amendment to
Certificates 247-W and 189-S in Seminole County by Sanlando
Utilities Corporation.

WITNESS: Direct Testimony Of Kimberly M. Dodson, Appearing
On Behalf Of Staff

DATE FILED: January 12, 2006

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DIRECT TESTIMONY OF KIMBERLY M. DODSON

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Q. What is your name and business address?

A. Kimberly M. Dodson, Florida Department of Environmental Protection, 3319 Maguire Blvd., Suite 232, Orlando, FL. 32803

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

A. I received a B.A. in Environmental Studies from Rollins College, Winter Park, in 1995. From 1991 to 1996 I worked in the environmental analytical laboratory field. Since 1996 I have worked for the Florida Department of Environmental Protection in the potable water program dealing with field inspections, Consumer Confidence Report rule, and enforcement.

Q. By whom are you presently employed?

A. Florida Department of Environmental Protection (FDEP or Department)

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

A. I have been employed with FDEP for 9 years and have been responsible for conducting inspections, managing the Consumer Confidence Report (CCR) rule program, and conducting enforcement. I am currently the Environmental Manager for the field compliance and enforcement section.

Q. What are your general responsibilities at the FDEP?

A. I manage the field compliance and enforcement section. The field compliance and enforcement section is responsible for inspecting potable water supply plants, generating inspection reports, entering inspection data in program database, managing the CCR rule program for community water systems, generating reports to determine compliance for CCR, taking enforcement action against systems not in compliance with FDEP rules, taking and referring drinking water complaints to the appropriate County Health

1 Department (DOH) for investigation under the DOH-DEP Interagency Agreement.

2 Q. Are you familiar with the City of Longwood water treatment systems in Seminole
3 County?

4 A. Yes. I have conducted four inspections at the City of Longwood water treatment plants
5 in Seminole County.

6 Q. Are the utility's treatment facilities and distribution systems in Seminole County
7 sufficient to serve its present customers?

8 A. Monthly operation reports (MORs) submitted by the utility are grossly deficient and the
9 Department is unable to make a determination about the capacity until corrected MORs
10 for 2005 are received.

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

13 A. Yes. A review of FDEP files does not reveal any consumer complaints regarding low
14 pressure. Lack of consumer complaints was used as a gauge since the Department does
15 not have data regarding continuous monitoring of pressure in the distribution system.

16 Q. Does the utility comply with Section 62-550.320, Florida Administrative Code (F.A.C.)
17 for an auxiliary power source in the event of a power outage?

18 A. Yes.

19 Q. Are the utility's water wells located in compliance with applicable FDEP regulations?

20 A. Yes.

21 Q. Q. Does the utility have certified operators as required by Chapter 62-602, F.A.C.?

22 A. Yes.

23 Q. Has the utility established a cross-connection control program in accordance with Section
24 62-555.360, FAC?

25

1 A. Yes.

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

3 A. No. Inspection results since 1997 indicate a chronic lack of maintenance. The
4 Department initiated enforcement action for a failure to maintain disinfection equipment
5 and failure maintain the required minimum disinfectant residual at the water treatment
6 plants and in the distribution system during 2003 and 2004. The inspection conducted
7 during January 2006 revealed several instances of a failure to maintain the required
8 minimum disinfectant residual at the water treatment plants. The ground storage tank at
9 water treatment plant #1 is in poor condition and the required inspection of structural and
10 coating integrity by personnel under the responsible charge of a professional engineer
11 licensed in Florida has not been provided to the Department. Insufficient cleaning of
12 aerators has been cited during each inspection since 1997 and a failure to provide
13 adequate protective covering on aerators and finished water storage tanks was cited
14 during December 2004 and January 2006. Modifications to the water treatment plants
15 and treatment processes have been made without proper notification to the Department
16 and/or necessary permits and personnel have been unable to provide explanation of
17 problems and corrective actions for the water treatment plants when asked during an
18 inspection. A Warning Letter OWL-PW-05-0001, dated February 21, 2005, lists some
19 of the deficiencies above. I am co-sponsoring Exhibit PJM-2 in Paul Morrison's
20 testimony and can answer questions relating to items 1, 2 and 3 in Exhibit PJM-2.

21 Q. Can you comment on the type and number of corrections above.

22 A. Yes. The utility demonstrates a chronic lack of maintenance and a failure to comply with
23 Department rules.

24 Q. Does the utility maintain the required chlorine residual or its equivalent throughout the
25

1 distribution system?

2 A. No. Inspection results and a review of records indicate the required minimum
3 disinfectant residual was not maintained at the water treatment plants or in the
4 distribution system numerous times during 2003 and 2004, and the required minimum
5 disinfectant residual was not maintained at the water treatment plants several times
6 during 2005. This information is unknown for some time periods, as the utility does not
7 have data for daily disinfectant residual concentration measurements in the distribution
8 system during those periods.

9 Q. Are the plant and distribution systems in compliance with all the other provisions of Title
10 62, F.A.C., not previously mentioned?

11 A. No. Submitted monthly operation reports are grossly deficient and measurements of
12 residual disinfectant concentration (required to be taken at least five days per week) are
13 repeatedly not recorded in logbooks and on monthly operation reports.

14 Q. Do you have anything further to add?

15 A. No.

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BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for amendment to
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County by Sanlando Utilities Corporation.

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DATED: JANUARY 12, 2006

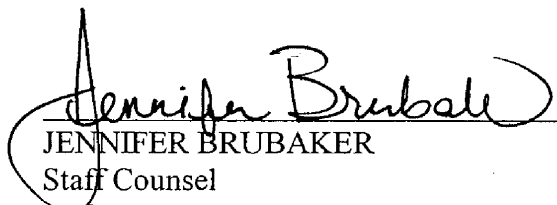
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the DIRECT TESTIMONY OF
KIMBERLY M. DODSON, on behalf of the Florida Public Service Commission, has been
furnished by U.S. Mail, this 12th day of January, 2006, to the following::

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