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Public Service Commission

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

DATE: March 5, 2009

TO: Ann Cole, Commission Clerk - PSC, Office of Commission Clerk

FROM: Richard P. Redemann, Professional Engineer III, Division of Economic Regulation

RE: Docket No. 090019-WS - Application of majority organizational control of Service Management Systems, Inc., holder of water Certificate No. 517-W and wastewater Certification 450-S, in Brevard County from IRD Osprey, LLC to Oak Lodge Utility, LLC

Please add the attached correspondence from Kim Dodson, Environmental Manager, DEP to Jim Bates, Service Management Systems, with a deficiency report to the above docket. Also attached is a reply to the deficiency report from Service Management Systems, which should also be added to the above docket. Thanks.

RPR:kb

DOCUMENT NUMBER-DATE
01834 MAR-6 08
FPSC-COMMISSION CLERK

Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

VIA EMAIL
JBATES3@CFL.RR.COM

September 6, 2007

Jim Bates, Director
Service Management Systems, Inc.
7500 South Highway A1A
Melbourne Beach, FL 32951

OCD-PW-SS-07-1111

Brevard County - PW
Service Management Systems (Aquarina)
PWS ID Number 3054060

Dear Mr. Bates:

This confirms a visit to the subject community public water system on July 31, 2007, by Reggie Phillips to conduct a sanitary survey.

Deficiencies noted during the inspection and/or determined from records on file in this office are listed on the report. Corrective actions are required to bring the subject system into complete compliance with relevant Department rules 62-550, 62-555, 62-560 and 62-602 of the *Florida Administrative Code* (F.A.C.).

Please correct and/or provide information on the indicated deficiencies and provide a written statement to the Department no later than **October 15, 2007**, stating that all deficiencies are corrected.

If you have any questions, please contact Reggie Phillips at the address listed above or by phone at (407) 893-3319.

Sincerely,

Kim Dodson

Kim Dodson, Environmental Manager
Drinking Water Compliance and Enforcement

KMD/rp
Enclosures

cc: Jeff Tuttle, Accurate Utilities
Reggie Phillips, FDEP

State of Florida
Department of Environmental Protection
Central District

SANITARY SURVEY REPORT

Plant Name SERVICE MANAGEMENT SYSTEMS County Brevard PWS ID # 3054060
Plant Location 7650 South Highway A1A, Melbourne Beach, FL 32951 Phone 321-723-2447
Owner Name Service Management Systems, Inc. Phone 321-723-2447
Owner Address 7500 South Highway A1A, Melbourne Beach, FL 32951
Contact Person Jim Bates Title Director Phone 321-723-2447
This Survey Date 7/31/07 Last Survey Date 10/28/04 Last C.I. Date 12/12/02

PWS TYPE & CLASS

☒ Community (2C)
☐ Non-transient Non-community
☐ Non-Community

PWS STATUS

☒ Approved system with approval number & date
WC05-2016A (3/17/83)
WC05-2016 (11/2/88)
☐ Unapproved system

SERVICE AREA CHARACTERISTICS

Subdivision

Food Service: ☐ Yes ☐ No ☒ N/A

OPERATION & MAINTENANCE

Certified Operator: ☒ Yes ☐ No ☐ Not required
Operator(s) & Certification Class-Number
David Whiteside C-6849, Ron Chupka C-8596
Jeff Tuttle C-7859
O & M Log: ☒ Yes ☐ No
O & M Manual: ☒ Yes ☐ No
Emergency Response Plan: ☒ Yes ☐ No ☐ N/A
Operator Visitation Frequency
Hrs/day: *Required* 3 + visits *Actual* Unknown
Days/wk: *Required* 5+2 *Actual* 5+2
Non-consecutive Days? ☐ Yes ☐ No ☒ N/A
MORs submitted regularly? ☒ Yes ☐ No ☐ N/A
Data missing from MORs? ☐ No ☒ Yes ☐ N/A
Operators must sign-in and sign-out of the O&M Logbook to verify visitation. The MORs submitted are not filled out in their entirety and frequently contain inaccuracies.
Number of Service Connections 300
Population Served 750 Basis X 2.5
Average Day (from MORs) 32,322 gpd
Max. Day (from MORs) 73,000 gpd 05/07
Max-day Design Capacity 120,000 gpd
Comments

RAW WATER SOURCE

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

AUXILIARY POWER SOURCE

☒ Yes ☐ None ☐ Not Required
Source Baldor diesel generator 3412 DT
Capacity of Standby (kW) 475
Switchover: ☒ Automatic ☐ Manual
Standby Plan: ☒ Yes ☐ No
Hrs Operated Under Load 4 hrs/mo.
What equipment does it operate?
☒ Well pumps Both
☒ High Service Pumps 350 gpm
☒ Treatment Equipment All
Satisfy average day demand? ☒Yes ☐No ☐Unk
Comments Please verify that the generator is exercised under load.

TREATMENT PROCESSES IN USE

Aeration, prefiltration, reverse osmosis
pH adjustment, disinfection
What additional treatment is needed?

For control of what deficiencies?

DISTRIBUTION SYSTEM

Flow Measuring Device Flow Meter
Meter Size & Type Sensus 1000 gpm
Backflow Prevention Devices: ☒ Yes ☐ No
Cross-connections None observed
Written Cross-connection Control Program: No
Flushing and Valve Maintenance Plan: No
Distribution System Map Available: No
Coliform Sampling Plan Available: No
Disinfectant/Disinfection Byproduct Rule Monitoring Plan: No
Lead/Copper Tap Sampling Plan: No

PWS ID # 3054060
Date 7/31/07

GROUND WATER SOURCE

Well Number		1 (north) AAC2808	2 (south) AAC2807		
Year Drilled		1981	1981		
Depth Drilled		595'	590'		
Drilling Method		Cable Tool	Cable Tool		
Type of Grout		Neat Cement	Neat Cement		
Static Water Level		Artesian	Artesian		
Pumping Water Level		Unknown	Unknown		
Design Well Yield		Unknown	Unknown		
Test Yield		Unknown	Unknown		
Actual Yield (if different than rated capacity)		600 gpm	600 gpm		
Strainer		Unknown	Unknown		
Length (outside casing)		400'	400'		
Diameter (outside casing)		18"	18"		
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	N/A	N/A		
	Reuse Water	N/A	N/A		
	WW Plumbing	>100'	>100'		
	Other Sanitary Hazard	None Observed	None Observed		
PUMP	Type	Vertical Turbine	N/A		
	Manufacturer Name	Peerless	N/A		
	Model Number	2626278	N/A		
	Rated Capacity (gpm)	Unknown	N/A		
	Motor Horsepower	7.5	N/A		
Well casing 12" above grade?		Yes	Yes		
Well Casing Sanitary Seal		OK	OK		
Raw Water Sampling Tap		Yes	Yes		
Above Ground Check Valve		Yes	Yes		
Fence/Housing		Not secured	Not Secured		
Well Vent Protection		No	N/A		

COMMENTS Well 1 – There is no protective screen on the well vent. Wells 1 and 2 are not secured with perimeter fencing. Both wells are artesian but flows are boosted by pumps in the plant building.

PWS ID # 3054060
Date 7/31/07

CHLORINATION (Disinfection)
Type: ☐ Gas ☒ Hypo
Make Pulsatron Capacity 30 gpd
Chlorine Feed Rate 90% of stroke
Avg. Amount of Cl_2 gas used N/A
Chlorine Residuals: Plant 2.7 Remote 1.1
Remote tap location Office restroom
DPD Test Kit: ☐ On-site ☒ With operator ☐ None ☐ Not Used Daily
Injection Points Into aerator catchment tank
Booster Pump Info N/A
Comments

Chlorine Gas Use Requirements	YES	NO	Comments
Dual System	☐	☐	
Auto-switchover	☐	☐	
Alarms:			
Loss of Cl_2 capability	☐	☐	
Loss of Cl_2 residual	☐	☐	
Cl_2 leak detection	☐	☐	
Scale	☐	☐	
Chained Cylinders	☐	☐	
Reserve Supply	☐	☐	
Adequate Air-pak	☐	☐	
Sign of Leaks	☐	☐	
Fresh Ammonia	☐	☐	
Ventilation	☐	☐	
Room Lighting	☐	☐	
Warning Signs	☐	☐	
Repair Kits	☐	☐	
Fitted Wrench	☐	☐	
Housing/Protection	☐	☐	

AERATION (Gases, Fe, & Mn Removal)
Type Forced Draft Capacity 78 gpm
Aerator Condition Poor
Bloodworm Presence None Observed
Visible Algae Growth None Observed
Protective Screen Condition Poor
Comments There are unsecured hatches and holes in the side of the aerator catchment tank.

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

Tank Type/Number	G1	H1	
Capacity (gal)	100,000	3,000	
Material	Concrete	Steel	
Gravity Drain	Yes	Yes	
By-pass Piping	No	Yes	
Pressure Gauge	N/A	Yes	
Sight Glass or Level Indicator	Yes	Yes	
Fittings for Sight Glass	No	Yes	
Protected Openings	Yes	No	
PRV/ARV	N/A	PRV	
On/Off Pressure	N/A	58/70	
Access Padlocked	Yes	Yes	

Comments Supply the most recent dates of tank cleaning and inspection.

HIGH SERVICE PUMPS

Pump Number			
Type			
Make			
Model			
Capacity (gpm)			
Motor HP			
Date Installed			
Maintenance			

Comments Please see the following page for pump information.

PWS ID # 3054060
Date 7/31/07

HIGH SERVICE PUMPS

Pump Number	H1/H2	T1/T2	B1/B2	RO1					
Type	Centrifugal			Vertical Turbine					
Make	Ampco	Sta-Rite	Ampco	Grundfos					
Model	212X27C	Unknown	2X1	Unknown					
Capacity (gpm)	175	Unknown	Unknown	Unknown					
Motor HP	15	1	7.5	15					
Date Installed	Unknown	Unknown	Unknown	Unknown					
Maintenance	As needed	As needed	As needed	As needed					

Comments H1 and H2 are high service pumps. T1 and T2 transfer water from the aerator catchment tank to the ground storage tank. B1 and B2 boost the pressure of incoming raw water through the filters and to the RO1 pump. RO1 is an RO train pressure booster pump.

ADDITIVES

Meets NSF 60 & 61 Unknown
Comments Caustic Soda is added to adjust the finished water pH. AF600 is added as an antiscalant.

FILTRATION (Suspended Solids Removal)

Type: Vertical wound cartridge
Size: 5 micron No. of Units 1
Length of Filter Runs: 10 psi change or 3 months
Type of Filter Media: Polypropylene cartridge
Is media visible? No Clean after BW? N/A
Filter Rate 80 gpm BW Rate N/A
Filter Capacity: 80 gpm
Cracks/Cementation/Channeling: N/A
Effluent Stability: OK Algae Growth N/A
Turbidity in clearwell? N/A
Head Loss Gauge: Yes
Comments

REVERSE OSMOSIS (Dissolved Solids Removal)

Make Codeline Pressure 100 psi
No. of Modules 4 (3 stage) Permeate Cap. 60 gpm
Blend Rate (GPM) 10 gpm
Waste-to-product Ratio 1:3 (~70% recovery)
Pre-treatment Prefiltration, AF600 as an antiscalant.
Effluent Quality: TDS (ppm) Permeate-120, blend-350
Waste Disposal Site Wastewater plant
IW Permit # & Expir. Date Unknown
Comments

DEFICIENCIES:

1. **Failure of operation personnel to properly sign in and out of the operation and maintenance logbook.**

   Operation and maintenance logs for each plant shall be maintained on site in a location accessible to 24-hour inspection, protected from weather damage, and current to the last operation and maintenance performed. The logs shall be maintained in hard bound books with consecutive page numbering, and shall contain a minimum of the previous three months of data at all times. Alternative logs or partial electronic logging are acceptable if approved by the appropriate Department district office or the local regulatory agency. The logs shall contain:

   (a) Identification of the plant;

   (b) The signature and license number of the operator and the signature of the persons making any entries;

   (c) Date and time in and out;

   (d) Specific operation and maintenance activities and any repairs made;

   (e) Results of tests performed and samples taken, unless documented on a laboratory sheet.

   (f) Performance of preventive maintenance and repairs or requests for repair of the equipment.

   [Rule 62-602.650(4), F.A.C.]

1. **Failure to submit adequate and complete monthly operation reports (MORs).** The following information is not indicated:

   a) PWS type;

   b) Total population served;

   c) Type of water treated;

   d) Incorrect permitted maximum day operating capacity;

   e) Maintenance events, and abnormal and emergency occurrences.

   Suppliers of water shall describe in the monthly operation reports all emergency or abnormal operating conditions and all maintenance or repair work that involves taking out of operation public water system components other than individual water service lines. [Rule 62-555.350(10) (e), F.A.C.]

   Suppliers of water shall submit monthly operation reports to the appropriate Department of Environmental Protection District Office within ten days after each month of operation per paragraph 62-550.730(1)(d), F.A.C. [Rule 62-555.350(12)(b), F.A.C.]

3. **This system received the following violations:**

   a) Reporting violation for late MOR submittals in February and June 2006, and March and June 2007;

   b) Reporting violations for inadequate CCR submittals in July 2006 and July 2007;

   c) Monitoring violation for late sampling of HAA5s in September 2006;

   d) Maximum contaminant level violations for TTHMs in March and June 2006.

4. **The operation and maintenance manual and emergency response plan must be updated to reflect changes to the system since the plans were authored.**

DEFICIENCIES (continued):

5. **Failure to provide a written preventive maintenance program.**

   Suppliers of water shall keep all necessary public water system components in operation and shall maintain such components in good operating condition so the components function as intended. Preventive maintenance on electrical or mechanical equipment -- including exercising of auxiliary power sources, checking the calibration of finished-drinking-water meters at treatment plants, testing of air or pressure relief valves for hydropneumatic tanks, and 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; however, in no case shall auxiliary power sources be run under load less frequently than monthly. [Rule 62-555.350(2), F.A.C.]

6. **Failure to keep records documenting that finished-drinking-water storage tanks have been cleaned and inspected during the past five years.**

   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.]

7. **Failure to keep records documenting that isolation valves are being exercised.**

   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.]

8. **Failure to keep records documenting that water mains are being flushed.**

   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.]

9. **Failure to provide a written sampling plan for total coliform monitoring.**

   Public water systems shall collect total coliform samples at sites that are representative of water throughout the distribution system and in accordance with a written sampling plan that addresses location, timing, frequency, and rotation period. These plans shall be available for review and possible revision on the occasion of a sanitary survey conducted by the Department. Descriptions of sampling locations shall be specific, i.e., numbered street addresses or lot numbers. Pressure tank or plant tap samples are not acceptable for determining compliance. [Rule 62-550.518(1), F.A.C.]

10. **Failure to provide a disinfectant/disinfection byproducts rule monitoring plan.**

    The monitoring plans required under 40 CFR 141.132(f) shall be prepared in a format containing all the information in 62-550.821(11), F.A.C. and shall be available for review during sanitary surveys conducted by the Department. [62-550.321(10) and (11), F.A.C.]

    An example monitoring plan format can be downloaded from the following website:
    http://www.dep.state.fl.us/water/drinkingwater/forms.htm

DEFICIENCIES (continued):

11. Failure to establish and implement a cross-connection control program that conforms to *Recommended Practice for Backflow Prevention and Cross-Connection Control*, AWWA Manual M14.

Community water systems, and all public water systems that have service areas also served by reclaimed water systems regulated under Part III of Chapter 62-610, F.A.C., shall establish and implement a routine cross-connection control program to detect and control cross-connections and prevent backflow of contaminants into the water system. This program shall include a written plan that is developed using recommended practices of the American Water Works Association set forth in *Recommended Practice for Backflow Prevention and Cross-Connection Control*, AWWA Manual M14, as incorporated into Rule 62-555.330, F.A.C. [Rule 62-555.360(2), F.A.C.]

Upon discovery of a prohibited cross-connection, public water systems shall either eliminate the cross-connection by installation of an appropriate backflow prevention device acceptable to the Department or shall discontinue service until the contaminant source is eliminated. [Rule 62-555.360(3), F.A.C.]

The Florida Rural Water Association's website, www.frwa.net, has a cross-connection control manual for your reference.

12. Failure to provide a lead and copper home tap monitoring plan.

Complete all parts of form 62-555.900(12), F.A.C., attach any maps and written narrative describing the sampling plan, and submit the completed form and any attachments to the appropriate Department of Environmental Protection (DEP) District Office 30 DAYS PRIOR TO THE BEGINNING OF A SIX-MONTH MONITORING PERIOD FOR LEAD AND COPPER IN DRINKING WATER. All information provided on the form shall be typed or printed in ink. The DEP District Office will notify a system of approval of a sampling plan in writing, which will provide the system notice to proceed. Submit a revised sampling plan using the form if any changes in the selection of sampling sites must be made. When no changes have been made, no resubmission is necessary prior to sampling during the next six-month sampling period. [Rule 62-555.900 (12), F.A.C.]

Form 62-555.900(12), F.A.C., can be downloaded from the following website:
http://www.dep.state.fl.us/water/drinkingwater/forms/pdf/555fm12.pdf

13. Failure to maintain records as required by rule.

Suppliers of water shall retain on their premises, or at a convenient location near their premises, the following records:

a) Records of bacteriological analyses made under this chapter shall be kept for not less than 5 years. Records of physical, chemical, or radiological analyses made under any portion of this chapter other than Rule 62-550.800, F.A.C., (including records of chemical analyses to determine compliance with maximum residual disinfectant levels) shall be kept for not less than 10 years. Actual laboratory reports may be kept, or data may be transferred to tabular summaries, provided that the information required in Rule 62-550.730, F.A.C., is included.

b) Records of action taken by the system to correct a violation of primary drinking water regulations shall be kept for a period not less than 3 years after the last action taken with respect to the particular violation involved.

c) Copies of any written reports, summaries, or communications relating to cross connection control program or sanitary surveys of the system conducted by the system itself, by a private consultant or by any local, State, or Federal agency, shall be kept for a period not less than 10 years after completion of the sanitary survey.

d) Records concerning a variance or exemption granted to the system shall be kept for a period ending not less than 5 years following the expiration of the variance and exemption.

e) Monthly operation reports shall be kept for a period of not less than 10 years.

DEFICIENCIES (continued):

f) Any system subject to the requirements of Rule 62-550.800, F.A.C., shall retain, for no fewer than 12 years, original records of all sampling data and analyses, reports, surveys, letters, evaluations, schedules, Department determinations, and any other information required by Rule 62-550.800, F.A.C.

g) Any system subject to this subpart must retain copies of its Consumer Confidence Report for no less than 3 years. [40 CFR 141, Subpart O, Section 155(h), as incorporated by reference in Rule 62-550.824, F.A.C.]

14. Failure to properly secure wells 1 and 2. There were no locked well security fences.

Wellheads shall be enclosed by fences with lockable access gates, housed in lockable buildings or enclosures, or otherwise protected against tampering, vandalism, and sabotage. [Rule 62-555.315(1), F.A.C.]

15. Failure to provide protective screens on vents and relief valves at all wells, pumps, and tanks.

Vents and release/relief valves shall terminate in a down-turned position at least 18 inches above the floor and be covered with a 24 mesh corrosion resistant screen. [*Recommended Standards for Water Works*, 1997 Edition, Great Lakes -- Upper Mississippi River Board of State Public Health and Environmental Managers incorporated by reference in Rule 62-555.330, F.A.C.]

Aerators and vents shall be protected from contamination by birds, insects, and windborne debris by covering with 24-mesh screen. [*Recommended Standards for Water Works*, 1997 Edition, Great Lakes -- Upper Mississippi River Board of State Public Health and Environmental Managers incorporated by reference in Rule 62-555.330, F.A.C.]

16. Failure to maintain equipment. All chemical day tanks and the aerator catchment tank had large holes and/or openings in their exteriors.

Suppliers of water shall keep all necessary public water system components in operation and shall maintain such components in good operating condition so the components function as intended. [Rule 62-555.350(2), F.A.C.]

17. Failure to prove that treatment chemicals meet NSF Standard 60. The identifying labels on the chemical drums and/or day tanks were badly worn or missing.

Drinking water additives and treatment chemicals, including chemicals used to regenerate ion-exchange resins or generate disinfectants on site at treatment plants, shall conform to one of the following:

1. NSF International Standard 60 as adopted in Rule 62-555.335, F.A.C.;
2. The standards in *Water Chemicals Codex* as adopted in Rule 62-555.335, F.A.C.; or
3. The standards in *Food Chemicals Codex* as adopted in Rule 62-555.335, F.A.C.

[Rule 62-555.320(3)(a), F.A.C.]

Suppliers of water shall ensure that drinking water treatment chemicals conform to the standards referenced in paragraph 62-555.320(3)(a), F.A.C., and shall have their lead/chief water treatment plant operators certify in writing on the required monthly operation reports that drinking water treatment chemicals conform to the standards referenced in paragraph 62-555.320(3)(a), F.A.C.

DEFICIENCIES (continued):

To determine or document whether drinking water additives or treatment chemicals or public water system components conform to the standards, regulations, or requirements listed above, suppliers of water or construction permit applicants may conduct their own evaluations or may rely upon third-party or manufacturer certifications. [Rule 62-555.320(3)(c), F.A.C.]

18. Failure to verify that the auxiliary power source (diesel generator) is exercised under load at least monthly.

Preventive maintenance on electrical or mechanical equipment -- including exercising of auxiliary power sources, checking the calibration of finished-drinking-water meters at treatment plants, testing of air or pressure relief valves for hydropneumatic tanks, and 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; however, in no case shall auxiliary power sources be run under load less frequently than monthly. [Rule 62-555-.350(2), F.A.C.]

COMMENTS/REMINDERS:

- Lead and copper tap sampling must be conducted during the June-September 2009 monitoring period.

  For other chemical monitoring requirements, you are advised to contact Marie Carrasquillo at 407-894-7555, 2242.

  Early sampling is recommended. Results shall be submitted within the first ten days following the end of the required monitoring period, or the first ten days following the month in which the sample results were received, whichever time is shortest.

- Suppliers of water shall telephone, and speak directly to a person at, the appropriate DEP District Office by no later than the previous business day before taking PWS components out of operation for planned maintenance or repair work if the work is expected to adversely affect finished-water quality, interrupt water service to 150 or more service connections or 350 or more people, interrupt water service to any one service connection for more than eight hours, or necessitate the issuance of a precautionary "boil water" notice in accordance with the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(10)(d), F.A.C.]

- Suppliers of water shall telephone, and speak directly to a person at, the appropriate DEP District Office as soon as possible, but never later than noon of the next business day, in the event of any of the following emergency or abnormal operating conditions:
  - The occurrence of any abnormal color, odor, or taste in a public water system's raw or finished water;
  - The failure of a public water system to comply with applicable disinfection requirements; or
  - The breakdown of any water treatment or pumping facilities, or the break of any water main, in a public water system if the breakdown or break is expected to adversely affect finished-water quality, interrupt water service to 150 or more service connections or 350 or more people, interrupt water service to any one service connection for more than eight hours, or necessitate the issuance of a precautionary "boil water" notice in accordance with the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(10)(b), F.A.C.]

PWS ID # 3051311
Date 7/31/07

COMMENTS/REMINDERS (continued):

- Suppliers of water shall telephone the SWP at 1-800-320-0519 immediately (i.e., within two hours) after discovery of any actual or suspected sabotage or security breach, or any suspicious incident, involving a public water system. [Rule 62-555.350(10)(a), F.A.C.]

- Suppliers of water shall notify affected water customers in writing or via telephone, newspaper, radio, or television by no later than the previous business day before taking public water system (PWS) components out of operation for planned maintenance or repair work if the work is expected to adversely affect finished-water quality or interrupt water service to any service connection. [Rule 62-555.350(10)(d), F.A.C.]

- Suppliers of water shall issue precautionary "boil water" notices as required or recommended in the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(11), F.A.C.]

Inspector _____ Title Environmental Specialist III Date 8/15/07

Approved by _____ Title Environmental Manager Date 9/6/07

SERVICE MANAGEMENT SYSTEMS, INC. SMS

RECEIVED
OCT 15 2007
DEP Central Dist

October 11, 2007

Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

ATTN: Kim Dodson, Environmental Manager
Drinking Water Compliance and Enforcement

RE: Deficiencies
Letter Dated September 6, 2007
PWS ID Number 3054060

Dear Kim Dodson,

This letter is in reference to the inspection made on July 31, 2007 by Reggie Phillips. The following are the responses to the eighteen deficiencies.

1. All operational personnel have been notified of the importance of properly documenting the log books and adhering to (a) through (f).

2. Accurate Utilities recognizes the missing information on the MOR's and will make the changes needed to (a) through (e).

3. Accurate Utilities will supply copies of the missing MORs, CCRs, HAA5s and the TTHMs.

4. The maintenance and operational manuals located in the R.O. plant are incorporated into the E.R.P.

5. All maintenance will be logged in the log book; the back page of the log book is the generator log. Our finished drinking water meter is and will be checked by FRWA as required. Our pressure relief valve on the hydro pneumatic tank is being checked.

6. Arrangements are presently being made to totally comply with the inspection and cleaning of our G.S.T. (ground storage tank) and hydro pneumatic tanks with a file documenting this.

7. The exercising of the isolation valve program and map is in our valve exercising plan in the R.O. plant.

8. A plan has been established for flushing the water mains and adding to our plan per the rules. The plan is in the R.O. plant.

9. Accurate Utilities will supply us with site plan.

10. Accurate Utilities will supply a disinfectant/disinfection plan.

ccc 11. D.E.P. accepted the construction and as built plans as built.

12. We currently have a plan for lead and copper testing and it is being followed.

13. The present year records are stored the in accounting office, any prior records are stored in our administration office although some records were destroyed and lost in the hurricane.

14. We are in the process of obtaining bids for fencing and locks for our wells.

15. Screens on vents and relief valves at all wells, pumps and tanks are now in place as required.

16. The chemical day tanks and the aerator catchment tank holes or openings have been repaired.

17. All identifying labels on the chemical drums and day tanks have been replaced.

18. The auxiliary generator power is run weekly in accordance with the equipment manufacturer's recommendation along with a log of the preventive maintenance program. We are logging load transfer in generator log.

If you have any questions, please contact Ron Chupka at the address above or by telephone 321-723-2447.

Sincerely,

Ron Chupka
Plant Operator
License #C8596