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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

10 SEP -3 PM 3: 07

In re: Application for increase in water rates in Franklin County by Water Management Services, Inc.

DOCKET NO. 100104-WU

COMMISSION CLERK

DATED: SEPTEMBER 3, 2010

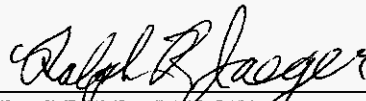
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Direct Testimony and Exhibit CM-1 of Cliff McKeown have been served by U.S. Mail, on this 3rd day of September, 2010, to the following:

Lisa C. Scoles, Esquire  
Radey Thomas Yon Clark  
Post Office Box 10967  
Tallahassee, FL 32302

Joseph A. McGlothlin  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400

Mr. Gene D. Brown  
Water Management Services, Inc.  
250 John Knox Road, #4  
Tallahassee, FL 32303-4234



RALPH R. JAEGER  
SENIOR ATTORNEY

FLORIDA PUBLIC SERVICE COMMISSION  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
Telephone: (850) 413-6234

COM 5  
APA \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
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DOCUMENT NUMBER DATE  
07448 SEP-3 2010  
FPSC-COMMISSION CLERK

DIRECT TESTIMONY OF CLIFF MCKEOWN

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Q. Please state your name and business address.

A. My name is Cliff McKeown. My business address is: Department of Environmental Protection, 630-3 Capital Circle NE, Tallahassee, Fl. 32308.

Q. By whom are you employed and in what capacity?

A. I am employed by the Florida Department of Environmental Protection (DEP), Northwest District. I am the primary inspector of all Public Water Systems subject to the Florida Safe Drinking Water Act, located East of the Apalachicola River and West of the center of Jefferson County.

Q. How long have you worked in that position?

A. I have been employed by DEP for 36 years. In that time, I have worked in Florida's wild-flowing Artesian well control program, in the domestic and industrial waste water programs, as well as the storm water program. My primary responsibilities for the last 31 years have been in the drinking water program.

Q. What are your duties in that position?

A. I inspect all public water supplies in my geographic area of responsibility and take enforcement actions as required to ensure compliance with the safe drinking water act.

Q. Please summarize your educational background and professional experience.

A. I graduated high school in 1970 and thereafter attended community college for two years. Also, as stated above, I have 36 years experience working in DEP.

Q. Have you ever filed or presented expert testimony before this Commission or any other regulatory agency?

A. I testified in an earlier rate case for this utility in 1994 (see Docket No. 940109-WU), and others including various DEP actions between 1975 and the present. Some of the other DEP actions involved this very utility.

1 Q. What is the purpose of your testimony in this proceeding?

2 A. The purpose of my testimony is to present the DEP's position on the following five  
3 points:

4 1. The utility's compliance with DEP regulations for drinking water.

5 2. The DEP's position on the customers of Water Management Services installing  
6 private, shallow wells and the installation of backflow prevention devices at those  
7 connections.

8 3. Test results for total trihalomethanes for this utility.

9 4. The condition of the utility's water storage tanks.

10 5. Recalibration of the utility's flow meters at its wells.

11 Each position is addressed below:

12 1. Utility's Compliance with DEP Regulations

13 The utility is currently in compliance with the applicable requirements of the Safe  
14 Drinking Water Act, based on the last inspection of March 5, 2010, as shown in a cover letter  
15 dated March 15, 2010, with an attached Compliance Inspection Form. The cover letter and  
16 Compliance Inspection Form are attached as Exhibit CM-1.

17 2. DEP's Position on Installation of Shallow Wells and Back-flow Preventers

18 Through Rule 62-555, Florida Administrative Code (F.A.C.), DEP requires all  
19 community type water systems to establish and implement a routine cross connection control  
20 program. The purpose of this program is to detect and protect against cross connections  
21 occurring which may endanger that customer or other customers of the system. This may  
22 occur through back-pressure or back siphonage, when an unproven source of water (such as a  
23 shallow well) is introduced within the system. All cross connection control programs  
24 recognize that any source of water that is not known to be potable is therefore non-potable and  
25 prohibited from introduction to the system and its customers.

1 Rule 62-555.360(2), F.A.C., requires all community type public water systems to  
2 establish and implement routine cross connection control programs and further requires that  
3 these programs be established in accordance with the American Water Works Association's  
4 Manual of Practice No. 14 (MOP 14). MOP 14 states in section 5.2, page 55, "An approved  
5 backflow-prevention assembly shall be installed at the service connection of the water  
6 purveyor to any premises where there is an auxiliary water supply or system, even though  
7 there is no connection between the auxiliary water supply and the public potable water  
8 system."

9 The installation of irrigation or other wells which produce water that is not regularly  
10 examined for bacteriological, chemical and radiological quality is considered non-potable.  
11 Because the water utility is required to operate this cross connection control program, the  
12 installation of non-potable wells increases the utility's work load. The utility's staff must  
13 determine the need for a back-flow preventer device, ensure that one is properly installed, and  
14 then these devices must be re-certified each year.

### 15 3. Test Results for Total Trihalomethanes (TTHMs)

16 During the years 2006, 2007, and 2008, the system exceeded the maximum  
17 contaminant levels (MCLs) for TTHMs of 80.5 parts per million (ppm). The Department of  
18 Health maintains a laboratory certification program. All public water supplies must use a lab  
19 certified under this program. The Department of Health determined that improper procedures  
20 were used in the handling and preservation of these samples and, as a result, DEP invalidated  
21 past results. Therefore, the utility was required to take four additional samples starting on  
22 August 17, 2009, and going through June 8, 2010. The levels for TTHMs in ppm for each of  
23 the last four tests are 41.6 (August 17, 2009), 23.8 (December 14, 2009), 29.9, March 15,  
24 2010) and 40.6 (June 8, 2010). The highest level of MCL recorded during these four tests was  
25 41.6, which is approximately 50% of the allowed TTHMs. Therefore, the test results for

1 TTHMs for this utility are now satisfactory. Based on this satisfactory four samples, the  
2 utility is now back on the normal sampling period of once every year.

3 4. Condition of Utility's Water Storage Tanks

4 This utility's ground storage reservoir is constructed of concrete and includes two  
5 gravity type aerators mounted on its roof. The aerators are there to remove hydrogen sulfide  
6 gas, a gas fairly common to Florida's groundwaters. This gas is highly corrosive and  
7 aggressive to certain substances such as concrete.

8 As the water pumped from the wells on the mainland flows through the aerators the  
9 water is separated into smaller and smaller volumes, thus exposing more of the water's surface  
10 to the atmosphere. This process strips the gas from the water allowing much of the gas to be  
11 dissipated into the atmosphere. Some of the gas however enters the ground storage reservoir,  
12 and, in the presence of moisture, forms a corrosive substance that attacks concrete.

13 It is somewhat common to have corrosion that is so severe that chunks of concrete may  
14 be removed by hand from the internal portions of the water tank above the water line.  
15 Because damage to water storage tanks is common for many different reasons, DEP requires  
16 an inspection of each tank every five years to determine its structural and coating integrity.  
17 These inspections must be supervised by a Florida Licensed Professional Engineer. The  
18 utility conducted a tank inspection in January 2006 for its ground storage tank and in March  
19 2009 for its elevated tank.

20 5. Recalibration of Utility's Flow Meters at its Wells.

21 The 2009 Sanitary Survey reported individual well meter accuracy results ranging  
22 from -1.0% to + 4.0% AWWA sets a accuracy standard of +/- 5%; therefore, recalibration is  
23 not required at this time.

24 Q. Does this conclude your testimony?

25 A. Yes, it does.



## Florida Department of Environmental Protection

Tallahassee Branch Office  
630-3 Capital Circle Northeast  
Tallahassee, Florida 32301

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

March 15, 2010

Sent via email  
(water2nm@yahoo.com)

Ms. Nita Molsbee  
250 John Knox Road  
Tallahassee, Florida 32303

Dear Ms. Molsbee:

An annual compliance inspection of St. George Island Water System (PWS ID No. 1190789) was completed on March 5, 2010, by Cliff McKeown, Engineering Specialist. Your assistance during the inspection was most helpful.

The purpose of this inspection was to evaluate the capability of the water system to continually produce safe drinking water. Public water systems in this state are regulated by the Department under the Florida Safe Drinking Water Act as promulgated by Florida Administrative Code Chapters 62-550, 555 and 560. The Department determines compliance with these regulations.

No major deficiencies were identified during the inspection. My congratulations to you and your staff on the condition of this system. Please note the section titled Outstanding Permits we would appreciate a written response within 15 days advising us of the status of these permits. Please address the response to me.

If you have any questions regarding the report and/or deficiencies, please contact Cliff McKeown at 850/488-3704 or e-mail (cliff.mckeown@dep.state.fl.us.)

Sincerely,

*Marlane Castellanos*

Marlane Castellanos  
Branch Manager

MC:cm  
Enclosures  
*Compliance Inspection Report*

cc: Franklin County Department of Health (jason\_flowersi@doh.state.fl.us)  
Scott Grubbs, (Scott.Grubbs@dep.state.fl.us)  
Angela Chelette, NFWMD (Angela.Chelette@nfwmd.state.fl.us )  
Cliff McKeown (cliff.mckeown@dep.state.fl.us)

**Compliance Inspection Form**

**BASIC INSPECTION AND SYSTEM INFO**

Water system: ST. GEORGE ISLAND UTILITIES System PWS #: 1190789 Date of inspection: 3/5/2010

System address: 250 JOHN KNOX ROAD - SUITE #4 City TALLAHASSEE State FL Zip 32303

System phone: 850/668-0440 Cell: 850/697-2836

Fax number: 850/927-3395 Email: water2nm@yahoo.com

Owner name: GENE BROWN Owner title:

Owner address: 250 JOHN KNOX ROAD - SUITE #4 City: TALLAHASSEE State FL Zip 32303

Owner phone: 850-668-0440 Cell: 850/519-7685

Fax number: Email: gdb5@comcast.net

Operator required?  Yes  No (If "No", Operator sections not applicable) Operator name: MS. NITA MOLSBEE

Operator Email WATER2NM@YAHOO.COM Phone 850/927-2648 Fax: 850/927-3395

S=Satisfactory U=Unsatisfactory -=Not Applicable \*=See comment below

SOURCE - WELL INFORMATION	Well Number	1	2	3	4	DISTRIBUTION	Water system map compliant?	Yes CAD
	Well head sealed? (Pad/conduit/openings)	S	S	S	S			Flushing of dead ends compliant?
Well casing 12" above grade?	S	S	S	S		Valve maintenance compliant?	Yes	
Casing vent compliant? (2003)	S	S	S	S		Chlorine residual > 0.2 mg/L	Yes	
Check valve compliant?	S	S	S	S		Number of high service pumps?	3	
Tap Compliant? (Smooth/12" high/pre-check)	S	S	S	S		High service pumps functional?	Yes	
Flow measurable?	S	S	S	S		CCC devices tested annually?	Yes	
Security measures compliant?	S	S	S	S		Flow meter accuracy checked?	Yes	
O & M manual compliant?	S	S	S	S		Emergency Preparedness Plan?	Yes	
Cl storage compliant (no organics/acid/sun)	S	S	S	S		In use permits have clearance?	Yes	
Spare chlorinator compliant?	S	S	S	S		Operator visits compliant?	Yes	
Loss of chlorine alarm compliant?	S	S	S	S		Plant checked 5 times per week?	Yes	
Treated sample tap provided?	S	S	S	S		MORs submittal compliant?	Yes	
Security measures compliant?	S	S	S	S		FOLLOW-UP TO LAST INSPECTION OR SURVEY		
TREATMENT HYPH	Cl solution NSF approved?	S	S	S	S	Last inspection fully compliant? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (see below)		
	Solution vat compliant?(covered/etc)	S	S	S	S	Number of deficiencies last cited?	N/A	
TREATMENT GAS	Safety: (Gloves/Apron/Eyewash/etc)	S	S	S	S	Were any of the deficiencies "repeat"?	N/A	
	Cl room compliant?(separate/ventilation)	S	S	S	S	Response from system submitted?	N/A	
	Scales compliant?	S	S	S	S	Have deficiencies been addressed?		
STORAGE	Auto switchover provided?	S	S	S	S	MONITORING SCHEDULE		
	Safety: (SCBA/Gloves/Ammonia/Panic HW)	S	S	S	S	<b>CHEMICAL</b>	<b>ANALYSIS DATE</b>	<b>NEXT DUE</b>
	Tank Number	1	2			Nitrate/Nitrite	8-09	2010
	Inspections compliant? (annual/5yr)	S	S			Inorganics	9-08	2011
Overflow/Vents compliant? (elevated)	S	S			Secondaries	9-08	2011	
Pressure relief valve provided? (hydro)					VOCs	9-08	2011	
Security measures compliant?	S	S			Rads	9-08	see below	
					SOCs	9-08/waiver	2011	
					UOCs	7-97	susp	
					Asbestos	waiver	2011	
					TTHM/HAA5(qtrs)	8,12-09	3-10	
					Pb/Cu (tri)	2008	2011	

<b>FIELD SAMPLING RESULTS</b>	Plant Cl (mg/L)	S			Plant=3.5	Distribution Cl (mg/L) / pH	State Park=2.5 West End=0.7
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**COMMENTS**

HANK GARRETT WMSHG2000@YAHOO.COM



**DEFICIENCIES**

**NO MAJOR DEFICIENCIES NOTED**

**Outstanding Permits**

Our records indicate that the enclosed list of permits have not been cleared by this office. Please submit a status report for the permits listed with your response to this report.

The 'status' would fall into one of the following categories, A, B, C, D, or E:

- A) not started
- B) started, but not completed
- C) completed, but not in use
- D) completed, and in use
- E) project abandoned (will not be built)

PROJECTNAME	PERMITNO	EXPIRES	OWNER NAME	STATUS
Resort Village	0244255-002DSGP/01	04/06/10	Mr. Morris Palmer	
St. George Island State Park	0076016-001-DSGP/01	07/23/11	Mr. Eric Kiefer	

INSPECTOR'S SIGNATURE *Cliff McKeown* TITLE ENGINEER SPECIALIST DATE: March 15, 2010  
CLIFF MCKEOWN

REVIEWED BY *Marlane Castellanos* TITLE BRANCH MANAGER DATE: March 15, 2010  
MARLANE CASTELLANOS