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Tradewinds Utilities, Inc.

P.O. Box 5220
Ocala, Fl 34478-5220
352-622-4949

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June 20, 2011

Ms. Ann Cole
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: Docket No. 100127-WU
Water & Sewer Sanitary Surveys

Dear Ms. Cole,

For the record attached are the Water and Sewer Sanitary Surveys and respective responses by our operations company U.S. Water Services Corp.
Sincerely

Charles deMenzes

Charles deMenzes

DOCUMENT NUMBER-DATE

04328 JUN 23 =

FPSC-COMMISSION CLERK



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
I.t. Governor

Herschel T. Vinyard, Jr.
Secretary

VIA EMAIL
CHARLIE@ALTERNATIVEPHONE.COM

April 13, 2011

Mr. Charles DeMenzes
Tradewinds Utilities, Inc.
P.O. Box 5220
Ocala, FL 34478

OCD-PW-SS-11-0380

Marion County – PW
Tradewinds Village
PWS ID Number 3424620

Dear Mr. DeMenzes:

This confirms a visit to the subject community public water system on March 31, 2011, by Dan Shideler to conduct a sanitary survey inspection. A copy of the sanitary survey inspection report is enclosed for your reference and records.

Deficiencies found during the sanitary survey and in Department records are listed in the enclosed report. These deficiencies shall be corrected in order to return to compliance with *Florida Administrative Code* (F.A.C.) Rules 62-550, 62-555, 62-560 and 62-602.

Please correct the indicated deficiencies, and notify the Department in writing that the deficiencies have been corrected, **no later than May 15, 2011**. (*You may use the attached response form to indicate the corrective actions taken.*)

If you have any questions, please contact Daniel Shideler by phone at (407) 894-7555, extension 2322, or by e-mail at Daniel.Shideler@dep.state.fl.us.

Sincerely,

Reggie Phillips, Environmental Supervisor II
Drinking Water Compliance and Enforcement

RFP/ds
Enclosures: CCCP Template

cc: Robbin Higgins, US Water Services Corporation [rhiggins@uswatercorp.com]

www.dep.state.fl.us

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FPSC-COMMISSION CLERK

State of Florida
Department of Environmental Protection
Central District
SANITARY SURVEY REPORT

Plant Name TRADEWINDS VILLAGE County Marion PWS ID # 3424620
Plant Location NE 43rd Place and NE 27th Court, Ocala, FL 34478 Phone 352-622-4949
Owner Name Tradewinds Utilities, Inc. Phone 352-622-4949
Owner Address PO Box 5220, Ocala, FL 34478
Contact Person Charles DeMenzes Title Owner Phone 352-622-4949
This Survey Date 3/31/11 Last Survey Date 5/08/08 Last Compliance Inspection Date 07/31/08

PWS TYPE: Community

PLANT CATEGORY & CLASS: 5C

MAX-DAY DESIGN CAPACITY: 950,000 gpd

PWS STATUS: Approved

TREATMENT PROCESSES IN USE

Hypochlorination

SERVICE AREA CHARACTERISTICS

Subdivision

Food Service: Yes No N/A

Number of Service Connections 375

Population Served 1,313 Basis: Operator

OPERATION & MAINTENANCE LOG: Yes

Location Water Treatment Plant

Comments _____

CERTIFIED OPERATOR: Yes

Operator(s) & Certification Class-Number:

Oliver Shockley C-13924

Hrs/day: Required _____ Visit _____ Actual _____ Visit _____

Days/wk: Required 5+1 Actual 5+1

Non-consecutive Days? Yes No N/A

Comments _____

MONTHLY OPERATION REPORTS (MORs)

MORs submitted regularly? Yes No N/A

Data missing from MORs? No Yes N/A

Average Day (from MORs) 132,589 gpd

Maximum Day (from MORs) 250,000 gpd 4/10

Comments _____

Flow Measuring Device Flow Meter

Meter Size & Type 8" Water Specialties

Date Last Calibrated Unknown

RAW WATER SOURCE

GROUND; Number of Wells 3

PURCHASED from PWS ID # _____

Emergency Water Source _____

Emergency Water Capacity _____

STANDBY POWER SOURCE: Yes

Source MO Diesel - MOP30IZ

Capacity of Standby (kW) 100

Switchover: Automatic Manual

Hrs Operated Under Load Unknown

What equipment does it operate?

Well Pumps Vertical Turbine well

High Service Pumps _____

Treatment Equipment All

Satisfy avg. daily demand? Yes No Unknown

Audio-visual alarm? Yes No

Comments _____

PLANS AND MAPS

Coliform Sampling Plan Yes No N/A

D/DBP Monitoring Plan Yes No N/A

Lead and Copper Plan Yes No N/A

Distribution System Map Yes No N/A

Emergency Response Plan Yes No N/A

Comments _____

PREVENTIVE MAINTENANCE/O&M

Operation & Maintenance Manual Yes No

Preventive Maintenance Program Yes No

Flushing Program Yes No N/A

Records Yes No N/A

Isolation Valve Exercise Yes No N/A

Records Yes No N/A

Comments _____

CROSS CONNECTION CONTROL

BFPAs None noted # Tested Unknown

WWTP RPZ Yes Date Tested Unknown

Written Plan Inadequate Date Unknown

Comments N/A

GROUND WATER SOURCE

Well Number (Florida Unique Well ID #)	1 (AAG9349)	2 (AAG9348)	3 (AAG9347)
Year Drilled	1983	1983	1991
Depth Drilled	285'	140'	164'
Drilling Method	Rotary	Rotary	Rotary
Type of Grout	Neat cement	Neat cement	Neat cement
Static Water Level	23'	23'	23'
Pumping Water Level	Unknown	Unknown	Unknown
Design Well Yield	Unknown	Unknown	Unknown
Test Yield	Unknown	Unknown	Unknown
Actual Yield (if different than rated capacity)	Unknown	Unknown	Unknown
Strainer	Unknown	Unknown	Unknown
Length (outside casing)	105'	111'	88'
Diameter (outside casing)	6"	6"	10"
Material (outside casing)	Black steel	Black steel	Black steel
Well Contamination History	None	None	None
Is inundation of well possible?	No	No	No
6' X 6' X 4" Concrete Pad	Yes	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	Submersible	Submersible
	Manufacturer Name	Sta-Rite	Sta-Rite
	Model Number	Unknown	Unknown
	Rated Capacity (gpm)	185	185
	Motor Horsepower	10	10
Well casing 12" above grade?	Yes	Yes	Yes
Well Casing Sanitary Seal	OK	OK	OK
Raw Water Sampling Tap	Yes	Yes	Yes
Above Ground Check Valve	Yes	Yes	Yes
Security	Yes	Yes	Yes
Well Vent Protection	Yes	Yes	N/A

COMMENTS: Wells 1 and 2 serve as backup wells.

CHLORINATION (Disinfection)

Type: Gas Hypo
 Make (2) Chem-Tech Capacity 30 gpd
 Chlorine Feed Rate 100%
 Avg. Amount of Cl₂ gas used N/A
 Chlorine Residuals: Plant 1.2 Remote 1.8
 Remote tap location: Publix
 DPD Test Kit: On-site With operator
 None Not Used Daily
 Injection Points Prior to elevated storage tank.
 Booster Pump Info _____
 Comments _____

STORAGE FACILITIES

(G) Ground (C) Clearwell (E) Elevated
 (B) Bladder (H) Hydropneumatic / flow-through

Tank Type/Number	*H1*	H2	E
Capacity (gal)	5,000	10,000	200,000
Material	Steel	Steel	Steel
Gravity Drain	Yes	Yes	Yes
By-Pass Piping	Yes	Yes	Yes
Protected Openings	Yes	Yes	Yes
Sight Glass or Level Indicator	Yes	Yes	Yes
PRV/ARV	PRV	PRV	None
Pressure Gauge	No	No	Yes
On/Off Pressure	N/A	N/A	50/60'
Access Secured	Yes	Yes	Yes
Access Manhole	Yes	Yes	Yes
Tank Sample Tap Location	On tank	On tank	Discharge piping
Date of Inspection	Unknown	Unknown	01/2008
Date of Cleaning	Unknown	Unknown	01/2008

Chlorine Gas Use Requirements	YES	NO	Comments
	<input type="checkbox"/>	<input type="checkbox"/>	
Dual System	<input type="checkbox"/>	<input type="checkbox"/>	
Auto-switchover	<input type="checkbox"/>	<input type="checkbox"/>	
Alarms:			
Loss of Cl ₂ capability	<input type="checkbox"/>	<input type="checkbox"/>	
Loss of Cl ₂ residual	<input type="checkbox"/>	<input type="checkbox"/>	
Cl ₂ leak detection	<input type="checkbox"/>	<input type="checkbox"/>	
Scale	<input type="checkbox"/>	<input type="checkbox"/>	
Chained Cylinders	<input type="checkbox"/>	<input type="checkbox"/>	
Reserve Supply	<input type="checkbox"/>	<input type="checkbox"/>	
Adequate Air-pak	<input type="checkbox"/>	<input type="checkbox"/>	
Sign of Leaks	<input type="checkbox"/>	<input type="checkbox"/>	
Fresh Ammonia	<input type="checkbox"/>	<input type="checkbox"/>	
Ventilation	<input type="checkbox"/>	<input type="checkbox"/>	
Room Lighting	<input type="checkbox"/>	<input type="checkbox"/>	
Warning Signs	<input type="checkbox"/>	<input type="checkbox"/>	
Repair Kits	<input type="checkbox"/>	<input type="checkbox"/>	
Fitted Wrench	<input type="checkbox"/>	<input type="checkbox"/>	
Housing/Protection	<input type="checkbox"/>	<input type="checkbox"/>	

Comments *H1 is offline*

HIGH SERVICE PUMPS

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

Comments _____

AERATION (Gases, Fe, & Mn Removal)

Type _____ Capacity _____
 Aerator Condition _____
 Visible Algae Growth _____
 Protective Screen Condition _____
 Frequency of Cleaning _____
 Date Last Inspected/Cleaned _____
 Comments _____

DEFICIENCIES:

1. **Failure to establish and implement a cross-connection control program.** The written cross-connection program shall include:
 - i. Written legal authority.
 - ii. Written policy establishing where backflow prevention at water service connections is mandatory because of actual or potential cross-connections.
 - iii. Written policy regarding ownership, installation, testing, and maintenance of backflow preventers at service connections.
 - iv. Written procedures for assessing new or existing service connections to determine the need for backflow preventers at service connections.
 - v. Written procedures for keeping cross-connection control program records.
 - vi. Written procedures for educating customers about cross-connection control and backflow prevention.
 - vii. Written procedures for investigating and responding to backflow incidents.

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.]

Deliver a copy of the completed Cross Connection Control Program to this office, Attention: Manuel Cardona. If you have any questions concerning cross connection control, please contact Manuel Cardona at 407-894-7555, extension 2322, or via email at Manual.Cardona@dep.state.fl.us.

2. **Failure to keep records documenting that dead-end 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.]

Monitoring:

- Bacteriological Sampling (one raw water, and two finished water distribution samples) required monthly.
- Nitrate, nitrite, and lead and copper tap sampling is due in 2011. Please review the full monitoring reminder schedule available at our website at:

<http://www.dep.state.fl.us/central/Home/DrinkingWater/InHouseCompliance/MonitoringSchedules/MonitoringSchedules.htm>

COMMENTS/REMINDERS:

- Provide information for all items marked "unknown."
- Provide the date of the most recent flow meter calibration.

Inspector *Daniel Hiddle* Title Env. Specialist II Date 4/13/11

Approved by *[Signature]* Title Env. Supervisor II Date 4/13/11

RESPONSE FORM

Please provide any changes to the following:

PWS ID Number: 3424620

Business Name: _____

PWS Name: Tradewinds Village

Owner(s) Name: _____

Attention: _____

Mailing Address: _____

Mailing Address: _____

Date: _____

Phone Number(s): _____

Fax Number: _____

E-Mail Address: _____

**Florida Department of Environmental Protection
Drinking Water Compliance/Enforcement Program
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803**

Attention: Daniel Shideler, Environmental Specialist

In response to the Department's **Sanitary Survey Report** for the subject public water system dated **March 31, 2011**, the following actions were done to correct the listed deficiencies:

<u>Deficiency Item No.</u>	<u>Corrective Action Done</u>	<u>Date Done</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(Attach additional sheet if necessary)

I hereby certify to the correctness of the above information:

PWS Owner/Representative Signature: _____

Name of PWS Owner/Representative: _____

(Please Type or Print)

TRADEWINDS UTILITIES FLUSHING PROGRAM

Conditions within a water supply distribution system can significantly affect water quality received by the public. This part of the water systems is just as important as the water treatment plant itself.

Under Department of Environmental Protection Rule 62-555.350(2) 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.

DEAD-END WATER LINES

1. The dead-end water lines shall be located and issued a section number, number on site and given a address.
2. Each dead-end line shall be accessible for flushing and have a blow off system.
3. Each dead-end blow off shall be maintained in operating condition.
4. The dead- end lines shall be flushed under the following guidelines and recorded on forms.
 - a. Flushed Quarterly
 - b. Chlorine Residual sampled
 - c. PH sampled
 - d. Gallons flushed
 - e. Appearance and Comments (Color, Odor, taste)
 - f. Time/ Date

WATER QUALITY COMPLAINTS

Taste and odor complaints originating within the distribution system are usually confined to limited areas or zones. Dead ends, low flow zones, and areas subject to wide flow variations or changes in the supply source all may experience higher than normal numbers of taste and odor complaints. Records of complaints should be reviewed so such areas can be identified and preventive measures, such as more frequent flushing, can be implemented.

MONTHLY REPORTS

A monthly report shall be filled out and turned in on amount of water flushed during the month.

Preventative Maintenance Log TRADEWINDS UTILITIES

Exercise ALL Mainline Valves - Annually Jan & Feb *(add sheets as needed)*

Valve ID #	Valve Location	Last Service (Date)	Service (Date)	Service (Date)	Service (Date)	Service (Date)



VALVE RECORD

Location (street / address):

Type:

Make:

Size:

Opens: Left Right Other:

of Turns:

Date Installed:

Date Exercised	Closes/Opens? (Y/N)	# of Turns	Condition of Stem, Packing, Nut, Gearing, Etc.	Valve Status (Open or Closed)

DEAD-END WATER MAIN FLUSHING RECORD

Location (street):

Flushing Date	Flushing Duration (min.)	Water Characteristics (color, odor, etc.)		Disinfectant Residual, mg/L	
		Before Flushing	After Flushing	Before Flushing	After Flushing



U.S. WATER SERVICES CORPORATION

Utility Operations, Maintenance, Design, Management, Engineering

TRADEWINDS UTILITIES WATER SYSTEM BACKFLOW PREVENTION AND CROSS-CONNECTION CONTROL POLICY

APRIL 2011

SECTION 1 CROSS-CONNECTION CONTROL - GENERAL POLICY

1.1 Purpose

The purpose of this policy is:

1.1.1 To protect the public potable water supply of Tradewinds Utilities Water System, from the possibility of contamination or pollution by isolating within the customer's internal distribution system(s) or the customer's private water system(s) such contaminants or pollutants that could backflow into the public water system; and,

1.1.2 To promote the elimination or control of existing cross connections, actual or potential, between the customer's in-plant potable water system(s) and non-potable water systems, plumbing fixtures, and industrial piping systems; and,

1.1.3 To provide for the maintenance of a continuing program of cross-connection control that will systematically and effectively prevent the contamination or pollution of all potable water systems.

1.2 Responsibility

The Tradewinds Utilities Water System shall be responsible for the protection of the public potable water distribution system from contamination or pollution due to the backflow of contaminants or pollutants through the water service connection. If, in the judgment of the Tradewinds Utilities Water System, an approved backflow-prevention assembly is required (at the customer's water service connection; or, within the customer's private water system) for the safety of the water system, the Tradewinds Utilities Water System or its designated agent shall give notice to said customer that such an approved backflow-prevention assembly(s) at specific location(s) will be installed by the Tradewinds Utilities Water System on his/her premises. The customer shall immediately install such approved assembly(s) at his/her own expense; and, failure, refusal, or inability on the part of the customer to install, have tested, and maintain said assembly(s) shall constitute grounds for discontinuing water service to the premises until such requirements have been satisfactorily met.

SECTION 2 DEFINITIONS

2.1 WATER COMMISSIONER OR HEALTH OFFICIAL

The Tradewinds Utilities Water System is invested with the authority and responsibility for the implementation of an effective cross-connection control program and for the enforcement of the provisions of this policy.

2.2 APPROVED

Accepted by the authority responsible as meeting an applicable specification stated or cited in this policy or as suitable for the proposed use.

2.3 AUXILIARY WATER SUPPLY

Any water supply on or available to the premises other than the purveyor's approved public water supply. These auxiliary waters may include water from another purveyor's public potable water supply or any natural source(s), such as a well, spring, river, stream, harbor, and so forth; used waters; or industrial fluids. These waters may be contaminated or polluted, or they may be objectionable and constitute an unacceptable water source over which the water purveyor does not have sanitary control.

2.4 BACKFLOW

The undesirable reversal of flow in a potable water distribution system as a result of a cross connection.

2.5 BACKPRESSURE

A pressure, higher than the supply pressure, caused by a pump, elevated tank, boiler, or any other means that may cause backflow.

2.6 BACKSIPHONAGE

The potential or actual reversal of flow (Backflow) into a potable Water Distribution System from a source of unknown quality caused by a negative or reduced pressure in the Potable Water Distribution System.

2.7.1 Air Gap The unobstructed vertical distance through the free atmosphere between the lowest opening from any pipe or faucet conveying water or waste to a tank, plumbing fixture, receptor, or other assembly and the flood level rim of the receptacle. These vertical, physical separations must be at least twice the diameter of the water supply outlet, never less than 1 in. (25mm).

2.7.2 Reduced-pressure backflow-prevention assembly. The approved reduced-pressure principle backflow-prevention assembly consists of two independently acting approved check valves together with a hydraulically operating, mechanically independent pressure differential relief valve located between the check valves and below the first check valve. These units are located between two tightly closing resilient-seated shutoff valves as an assembly and equipped with properly located resilient-seated test cocks.

2.7.3 Double check valve assembly. The approved double check valve assembly consists of two internally loaded check valves, either spring loaded or internally weighted, installed as a unit between two tightly closing resilient-seated shutoff valves and fittings with properly located resilient-seated test cocks. This assembly shall only be used to protect against a non-health hazard (that is, a pollutant).

2.8 Contamination

An impairment of a potable water supply by the introduction or admission of any foreign substance that degrades the quality and creates a health hazard.

2.9 Cross Connection

A connection or potential connection between any part of a potable water system and any other environment containing other substances in a manner that, under any circumstances would allow such substances to enter the potable water system. Other substances may be gases, liquids, or solids, such as chemicals, waste products, steam, water from other sources (potable or non-potable), or any matter that may change the color or add odor to the water.

2.10 Cross Connection - Controlled

A connection between a potable water system and a non-potable water system with an approved backflow-prevention assembly properly installed and maintained so that it will continuously afford the protection commensurate with the degree of hazard.

2.11 Hazard, Degree of

The term is derived from an evaluation of the potential risk to public health and the adverse effect of the hazard upon the potable water system.

2.12.1 HAZARD-HEALTH. A cross connection or potential cross connection involving any substance that could, if introduced in the potable water supply, cause death, illness, spread disease, or have a high probability of causing such effects.

2.12.2 HAZARD-PLUMBING. A plumbing-type cross connection in a consumer's potable water system that has not been properly protected by an approved air gap or an approved backflow-prevention assembly.

2.12.3 HAZARD-NON-HEALTH. A cross connection or potential cross connection involving any substance that generally would not be a health hazard but would constitute a nuisance or be aesthetically objectionable, if introduced into the potable water supply.

2.12.4 HAZARD-SYSTEM. An actual or potential threat of severe damage to the physical properties of the public potable water system or the consumer's potable water system or of a pollution or contamination that would have a protracted effect on the quality of the potable water in the system.

2.13 INDUSTRIAL FLUIDS SYSTEM

Any system containing a fluid or solution that may be chemically, biologically, or otherwise contaminated or polluted in a form or concentration, such as would constitute a health, system, pollution, or plumbing hazard, if introduced into an approved water supply. This may include, but not be limited to: polluted or contaminated waters; all types of process waters and used waters originating from the public potable water system that may have deteriorated in sanitary quality; chemicals in fluid form; plating acids and alkalis; circulating cooling waters connected to an open cooling tower; and/or cooling towers that are chemically or biologically treated or stabilized with toxic substances; contaminated natural waters, such as wells, springs,

streams, rivers, bays, harbors, seas, irrigation canals or systems, and so forth; oils, gases glycerin, paraffin's, caustic and acid solutions, and other liquid and gaseous fluids used in industrial or other purposes for fire-fighting purposes.

2.14 POLLUTION

The presence of any foreign substance in water that tends to degrade its quality so as to constitute a non-health hazard or impair the usefulness of the water.

2.15 WATER-POTABLE

Water that is safe for human consumption as described by the public health authority having jurisdiction.

2.16 WATER-NON-POTABLE

Water that is not safe for human consumption or that is of questionable quality.

2.17 SERVICE CONNECTION

The terminal end of a service connection from the public potable water system, that is, where the water purveyor loses jurisdiction and sanitary control over the water at its point of delivery to the customer's water system. If a meter is installed at the end of the service connection, then the service connection shall mean the downstream end of the meter. There should be no unprotected takeoffs from the service line ahead of any meter or backflow-prevention assembly located at the point of delivery to the customer's water system. Service connection shall also include water service connection from a fire hydrant and all other temporary or emergency water service connections from the public potable water system. An approved connection is required in all cases.

2.18 WATER-USED

Any water supplied by a water purveyor from a public potable water system to a consumer's water system after it has passed through the point of delivery and is no longer under the sanitary control of the water purveyor.

SECTION 3 REQUIREMENTS

3.1 WATER SYSTEM

3.1.1 The water system shall be considered as made up of two parts: the utility system and the customer system.

3.1.2 Utility system shall consist of the source facilities and the distribution system, and shall include all those facilities of the water system under the complete control of the utility, up to the point where the customer's system begins.

3.1.3 The source shall include all components of the facilities utilized in the production, treatment, storage, and delivery of water to the distribution system.

3.1.4 The distribution system shall include the network of conduits used for the delivery of water from the source to the customer's system.

3.1.5 The customer's system shall include those parts of the facilities beyond the termination of the utility distribution system that are utilized in conveying utility-delivered domestic water to points of use.

3.2 POLICY

3.2.1 No water service connection to any premises shall be installed or maintained by the water purveyor unless the water supply is protected as required by state laws and regulations and this policy. Service or water to any premises shall be discontinued by the water purveyor if a backflow-prevention assembly required by this policy is not installed, tested, and maintained, or if it is found that a backflow-prevention assembly has been removed, bypassed, or if an unprotected cross connection exists on the premises. Service will not be restored until such conditions or defects are corrected.

3.2.2 The customer's system should be open for inspection at all reasonable times to authorized representatives of the Tradewinds Utilities Water System to determine whether cross connections or other structural or sanitary hazards, including violations of these regulations, exist. When such a condition becomes known, the Tradewinds Utilities Water System shall deny or immediately discontinue service to the premises by providing for a physical break in the service line until the customer has corrected the condition(s) in conformance with state and county statutes relating to plumbing and water supplies and the regulations adopted pursuant thereto.

3.2.3 In approved backflow-prevention assembly shall be installed on each service line to a customer's water system at or near the property line or immediately inside the building being served; but in all cases, before the first branch line leading off the service line wherever the following conditions exist:

3.2.3a In the case of premises having an auxiliary water supply that is not or may not be of safe bacteriological or chemical quality and that is not acceptable as an additional source by the Tradewinds Utilities Water System, the public water system shall be protected against backflow from the premises by installing an approved backflow-prevention assembly in the service line, appropriate to the degree of hazard.

3.2.3b In the case of premises on which any industrial fluids or any other objectionable substances are handled in such a fashion as to create an actual or potential hazard to the public water system, the public system shall be protected against backflow from the premises by installing an approved backflow-prevention assembly in the service line, appropriate to the degree of hazard. This shall include the handling of process waters and waters originating from the utility system that have been subject to deterioration in quality.

3.2.3c In the case of premises having (1) internal cross connections that cannot be permanently corrected and controlled, or (2) intricate plumbing and piping arrangements or where entry to all portions of the premises is not readily accessible for inspection purposes, making it impracticable or impossible to ascertain whether or not dangerous cross connections exist, the public water system shall be protected against backflow from the premises by installing an approved backflow-prevention assembly in the service line.

3.2.4 The type of protective assembly required under subsections 3.2.3a, 3.2.3b, and 3.2.3c shall depend upon the degree of hazard that exists as follows:

3.2.4a In the case of any premises where there is an auxiliary water supply as stated in subsection 3.2.3a of this section and it is not subject to any of the following rules, the public water system shall be protected by an approved air-gap separation or an approved reduced-pressure principle backflow-prevention assembly.

3.2.4b In the case of any premises where there is water or substance that would be objectionable but not hazardous to health, if introduced into the public water system, the public water system shall be protected by an approved double check valve assembly.

3.2.4c In the case of any premises where there is any material dangerous to health that is handled in such a fashion as to create an actual or potential hazard to the public water system, the public water system shall be protected by an approved air-gap separation or an approved reduced-pressure principle backflow-prevention assembly. Examples of premises where these conditions will exist include sewage treatment plants, sewage pumping stations, chemical manufacturing plants, hospitals, mortuaries, and plating plants.

3.2.4d In the case of any premises where there are "uncontrolled" cross connections, either actual or potential, the public water system shall be protected by an approved air-gap separation or an approved reduced-pressure principal backflow-prevention assembly at the service connection.

3.2.4f In the case of any premises where, in the opinion of the Tradewinds Utilities Water System , an undue health threat is posed because of the presence of extremely toxic substances, the Tradewinds Utilities Water System may require an air gap at the service connection to protect the public water system. This requirement will be at the discretion of the Tradewinds Utilities Water System and is dependent on the degree or hazard.

3.2.5 Any backflow-prevention assembly required herein should be a model and size approved by the Tradewinds Utilities Water System . The term *approved backflow-prevention assembly* shall mean an assembly that has been manufactured in full conformance with the standards established by the **American Water Works Association** titled:

4821 U.S. Highway 19, Suite 2, New Port Richey, Florida 34652
Ph: 727-848-8292 Fx: 727-848-7701

AWWA C510-89-Standard for Double Check Valve Backflow-Prevention Assembly, and AWWA C511-89-Standard for Reduced-Pressure Principle Backflow-Prevention Assembly, and have met completely the laboratory and field performance specifications of the Foundation for Cross-connection Control and Hydraulic Research of the University of Southern California established by "Specification of Backflow-Prevention Assemblies"-Sec. 10 of the most current issue of the Manual of Cross-Connection Control.

Said AWWA and FCCHR standards and specifications have been adopted by the Tradewinds Utilities Water System . Final approval shall be evidenced by a "Certificate of Approval" issued by an approved testing laboratory certifying full compliance with said *AWWA* standards and FCCHR specifications.

The following testing laboratory has been qualified by the Tradewinds Utilities Water System to test and certify backflow preventers:

Foundation for Cross-Connection Control and Hydraulic Research
University of Southern California
University Park
Los Angeles, CA 90089

Testing laboratories, other than the laboratory listed above, will be added to an approved list as they are qualified by the Tradewinds Utilities Water System .

Backflow preventers that may be subjected to backpressure or backsiphonage that have been fully tested and have been granted a certificate of approval by said qualified laboratory and are listed on the laboratory's current list of approved backflow-prevention assemblies may be used without further testing or qualification.

3.2.6 It shall be the duty of the Tradewinds Utilities Water System at any premises where backflow-prevention assemblies are installed to have certified inspections and operational tests made at least once per year. In those instances where the Tradewinds Utilities Water System deems the hazard to be great enough, certified inspections may be required at more frequent intervals. These inspections and tests shall be at the expense of the water user and shall be performed by the Tradewinds Utilities Water System personnel, or by a certified tester approved by the Tradewinds Utilities Water System . It shall be the duty of the Tradewinds Utilities Water System to see that these tests are made in a timely manner. The Tradewinds Utilities Water System shall notify the customer in advance when the tests are to be undertaken so that the customer may witness the tests if so desired. These assemblies shall be repaired, overhauled, or replaced at the expense of the customer whenever said assemblies are found to be defective. Records of such tests, repairs, and overhaul shall be immediately forwarded to the Tradewinds Utilities Water System for retention as a file of record in accordance with chapter 62.550.720(3) FAC. All records related to this policy shall be retained by the Tradewinds Utilities Water System for a period of no less than ten (10) years.

EMERGENCY PROCEDURE

In the event of a Backflow condition resulting in Potable Water Distribution System contamination and/or potential for human illness or sickness, Section 3.2.2 of this Policy shall be immediately executed when identified by the Tradewinds Utilities Water System . All appropriate measures necessary to protect all consumers, ascertain the extent of and to contain the impact of any actual or potential contamination shall be immediately executed by the Tradewinds Utilities Water System . Further, the State Departments of Environmental Protection and Health and Rehabilitative Services shall be contacted to insure that steps taken are sufficient to protect the public, and corrective measures are appropriate for any actual or potential contamination.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

SENT VIA E-MAIL TO: charlie@alternativephone.com

November 16, 2010

TRADEWINDS UTILITIES INC
POST OFFICE BOX 5220
OCALA FL 34478

OCD-C-WW-10-0804

ATTENTION CHARLES DEMENZES
PRESIDENT

Marion County - DW
Tradewinds WWTF
Wastewater Facility - Permit No. FLA010699
Noncompliance Letter

Dear Mr. Demenzes:

On October 21, 2010, Department personnel conducted a routine inspection of the above-referenced facility. A copy of the inspection report is attached for your review. Please note the items listed below which need to be addressed:

1. The surface of the south clarifier in the west plant was covered with foam.
2. One of the clarifier skimmers in the south clarifier of the west plant was not functional.
3. Solids were present in the chlorine contact chambers and in the final effluent. This deficiency as also noted in the Noncompliance Letter Numbers OCD-C-WW-09-0301 and OCD-C-WW-09-0672, dated April 15, 2009 and August 27, 2009, respectively.
4. The last calibration date on the flow meter was April 22, 2009. Flow measuring devices must be calibrated at least annually.
5. Vibrations caused by the air line in the west plant are excessively noisy.
6. An air leak was noted in the west plant.
7. The Fecal Coliform (FC) result reported on the Discharge Monitoring Report (DMR) for September 2009 was 20,000 fecal coliform colonies per 100 milliliters (fcc/100mL), which exceeded the maximum limit of 800 fcc/100mL for any one (1) sample.
8. The Total Suspended Solids (TSS) maximum result reported on the DMR for March 2010 was 65 mg/L, which exceeded the maximum limit of 60 mg/L for any one (1) sample.
9. The TSS annual average result reported on the DMRs for the following months exceeded the maximum limit of 20 mg/L:

"More Protection, Less Process"
www.dep.state.fl.us

DOCUMENT NUMBER-DATE

04328 JUN 23 =

FPSC-COMMISSION CLERK

October 2009	23.7
November 2009	24.6
December 2009	25
January 2010	23
February 2010	24.8
March 2010	30
April 2010	31
May 2010	32.5
June 2010	31.5

The Department requests a written response addressing the items listed above within 14 days from the date of this letter. Your response should include an explanation of any corrective actions that have either been taken or that you plan to take. Please note that this letter and report, being part of the Department's investigation, is preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. Please direct your response and any questions to Katie Williams at (407) 893-3313, or via e-mail: Kathryn.m.williams@dep.state.fl.us.

Sincerely,

David Smicherko

David Smicherko
Supervisor
Wastewater Compliance/Enforcement

DS/kmw/ar

Enclosure: Inspection Report

cc: Marion County Health Department, daniel_dooley@doh.state.fl.us
Protech Water and Wastewater, judy@protechww.com
Fred Lane, fred.lane@marioncountyfl.org

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTEWATER COMPLIANCE INSPECTION REPORT
FACILITY AND INSPECTION INFORMATION

@ = Optional

Name and Physical Location of Facility	WAFR ID:	County	Entry Date/Time
Tradewinds WWTF 2925 NE 43 rd Place Ocala FL 34479	FLA010699	Marion	October 21, 2010
		Phone	@ Exit Date/Time
			October 21, 2010
Name(s) of Field Representatives(s)	Title	Phone	
Name and Address of Permittee or Designated Representative	Title	Phone	@ Operator Certification #
Charles Domenzes Tradewinds Utilities Inc. PO Box 5220 Ocala FL 34478	Chief Executive Officer		



Inspection Type:	<input type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> I	Samples Taken(Y/N): N	@ Sample ID#:	Samples Split (Y/N):
<input checked="" type="checkbox"/> Domestic	<input type="checkbox"/> Industrial	Were Photos Taken(Y/N): Y		@ Log book Volume : 3	@ Page 5	

FACILITY COMPLIANCE AREAS EVALUATED

IC: In Compliance; NC: Out of Compliance; SC: Significant out of Compliance; NA: Not Applicable; NE or Blank: Not Evaluated
 Significant Non-Compliance Criteria Should be Reviewed when Out of Compliance Ratings Are Given in Areas Marked by a "♦"

	PERMITS/ORDERS		SPEE MONITORING PROGRAM		FACILITY OPERATIONS		EFFLUENT DISPOSAL
IC	1. ♦ Permit	NA	3. Laboratory	NC	6. Facility Site Review	SC	9. ♦ Effluent Quality
NC	2. ♦ Compliance Schedules	NA	4. Sampling	NC	7. Flow Measurement	IC	10. ♦ Effluent Disposal
		NC	5. ♦ Records & Reports	NC	8. ♦ Operation & Maintenance	IC	11. Residuals/Studge
	13. Other:					NA	12. Groundwater

Facility and/or Order Compliance Status: <input type="checkbox"/> In-Compliance <input type="checkbox"/> Out-Of-Compliance <input checked="" type="checkbox"/> Significant-Out-Of-Compliance
Recommended Actions: noncompliance letter

Name(s) and Signature(s) of Inspector(s)	District Office/Phone Number	Date
Katie Williams 	Central/407-893-3313	November 5, 2010
@ Signature of Reviewer	District Office/Phone Number	Date
David Smicherko 		November 12, 2010

INSPECTION SUMMARY

Facility Name: Tradewinds WWTF
Facility ID No: FLA010699
Inspection Type: Compliance Evaluation Inspection
Inspection Date: October 21, 2010

PERMIT: In Compliance

Permit No. FLA010699 expired January 10, 2010. A copy of the most current permit was available onsite. The facility is currently in the permitting process.

COMPLIANCE SCHEDULES: Not Evaluated

LABORATORY: Not Applicable

*Please see attached Laboratory Evaluation Summary for details (if applicable)

SAMPLING: Not Applicable

RECORDS AND REPORTS: Out of Compliance

- A bound and numbered logbook was onsite, containing sufficient operation and maintenance entries.
- Current operator certifications were onsite, valid through April 30, 2011.
- A current laboratory certification for Aqua Pure was onsite, valid through June 30, 2011.
- An O&M manual was onsite.
- DMR Paperwork Review, September 2009- June 2010:
 - October 2009: **TSS annual average exceedance was not acknowledged**

FACILITY SITE REVIEW: Out of Compliance

West Plant

- Aeration was even in all bays.
- Contents of the stilling wells were mostly liquid.
- The north clarifier had good clarity. **The south clarifier was covered with foam and pop ups, and one skimmer did not appear to be functioning.** Overall the weirs were clean, but **small solids were entering.** Both clarifiers had good settling with no pop ups and only pin floc. **The RAS line was slightly leaking into the clarifier.**
- There were no solids in the weirs.
- The digester had storage available.

East Plant

- Aeration was even in all bays.
- Contents of the stilling well were liquid and aerated.
- The clarifier had good clarity with a few pop ups. The skimmer was operating.
- Water entering the weir was clear and the weir was clean.

- The digester had storage available.
- **Water in all of the CCCs was turbid, gassing, and contained solids. The water in the third CCC was still over the baffle. These deficiencies have been noted numerous times before.**
- RPZ was last tested December 24, 2009.

FLOW MEASUREMENT: Out of Compliance

- **Last calibration was performed April 22, 2009.**

OPERATION AND MAINTENANCE: Out of Compliance

- **Vibrations from the air line in the west plant are excessively noisy.**
- **An air leak was noted in the west plant, between the south clarifier and aeration.**

EFFLUENT QUALITY: Significant Out of Compliance

- TRC taken during inspection: 0.99mg/L
- DMR Paperwork Review, permit limit exceedances:
 - **September 2009: FC max 20, 000 (limit 800)**
 - **October 2009: TSS annual average 23.7 (limit 20)**
 - **November 2009: TSS annual average 24.6 (limit 20)**
 - **December 2009: TSS annual average 25 (limit 20)**
 - **January 2010: TSS annual average 23 (limit 20)**
 - **February 2010: TSS annual average 24.8 (limit 20)**
 - **March 2010: TSS annual average 30 (limit 20)**
TSS max 65 (limit 60)
 - **April 2010: TSS annual average 31 (limit 20)**
 - **May 2010: TSS annual average 32.5 (limit 20)**
 - **June 2010: TSS annual average 31.5 (limit 20)**
FC max 20,000 (limit 800), exceedance reported

EFFLUENT DISPOSAL: In Compliance

- The sprayfield was visually inspected through the gate. Sprayers were not running, but the field appeared to be well-maintained.

RESIDUALS/SLUDGE: In Compliance

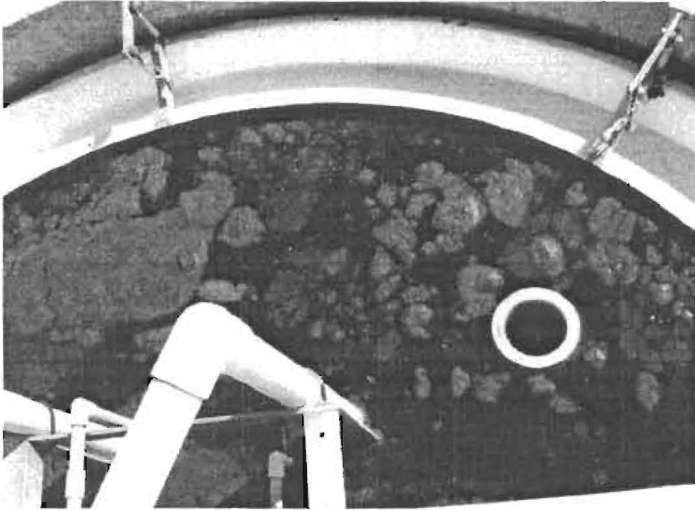
- 12,000 gallons of residuals were last hauled May 25, 2010 by AP&T.

GROUND WATER: Not Applicable

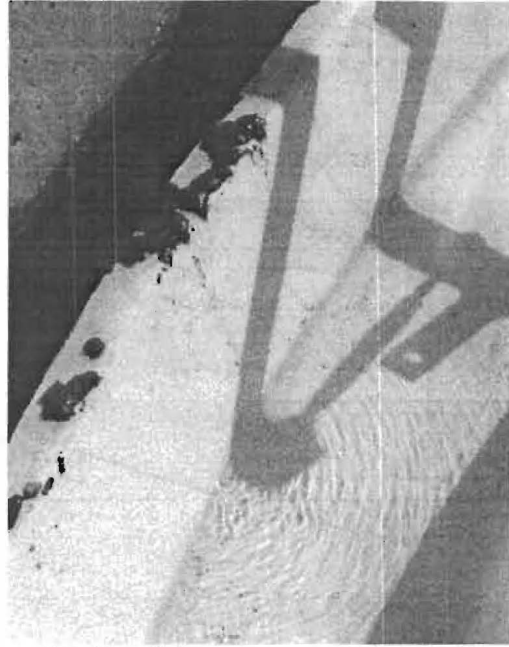
OTHER: The following malfunctions were reported to the Department during the review period

- **July 6, 2010: clogged RAS caused 250-400 gallons of solids to enter CCC, with some making it to the sprayfield.**

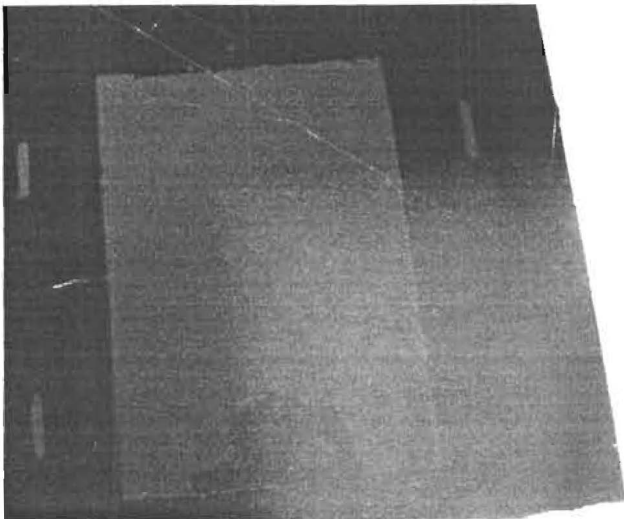
- **June 29, 2010:** ruptured air line caused RAS to stop working, allowing 200-250 gallons of solids to go over the weir into the CCC.
- **June 10, 2010:** Fecal Coliform sample 1Z. Reason for exceedance unknown.



North clarifier of West Plant



Small solids entering weir in the West plant.



Chlorine Contact Chamber turbidity

U.S. Water



Services Corporation

copy

Water and Wastewater Utility Operations, Maintenance, Engineering, Management

November 24, 2010

David Smicherko
FDEP Central District
3319 Maguire Blvd., Suite 232
Orlando, FL 32803-3767

**RE: Tradewinds WWTF
Marion County
Permit No. FLA010699**

Dear Mr. Smicherko:

This information is provided in response to the items addressed in your letter dated November 16, 2010.

- 1. Deficiency – The surface of the south clarifier in the west plant was covered with foam.**

U.S. Water Services took over operation of this facility on November 1, 2010. We are in the process of evaluating the treatment and making necessary adjustments to assure proper treatment. Thus far our operator has made adjustments that have cleared the foam from the facility.

- 2. Deficiency – One of the clarifier skimmers in the south clarifier of the west plant was not functional.**

The skimmer was repaired on November 15, 2010.

- 3. Deficiency – Solids were present in the chlorine contact chambers and in the final effluent. This deficiency was also noted in the non-compliance letters, dated April 15, 2009 and August 27, 2009 respectively.**

U.S. Water Services is in the process of evaluating the treatment and making adjustments to the facility to ensure proper treatment. We will be pumping the solids out of the CCCs to the digester for removal from site.

- 4. Deficiency – The last calibration date on the flow meter was April 22, 2009. Flow measuring devices must be calibrated at least annually.**

4939 Cross Bayou Boulevard ~ New Port Richey ~ Florida 34652

Ph: 727-848-8292 ~ Fx: 727-849-4219 ~ Toll Free: 866-753-8292

Florida Rural Water will be contacted to perform the annual flow calibrations. A copy will be forwarded to the Department upon completion.

5. Deficiency – Vibrations caused by the air line in the west plant are excessively noisy.

We will investigate and make adjustments as necessary to reduce the vibrations, possibly adding pipe supports.

6. Deficiency – An air leak was noted in the west plant.

The air leak will be repaired.

7. Deficiency – The fecal coliform result reported on the DMR for September 2009 was 20,000 fecal colonies per 100 ml which exceeded the maximum limit of 800 fecal colonies per 100 ml.

U.S. Water Services has just taken over the operation of this facility of November 1, 2010 we are not certain what the cause of previous exceedences is. However, we are making process control adjustments to ensure that the facility will stay in compliance under our operation.

8. Deficiency – The TSS maximum reported on the DMR for March 2010 was 65 mg/l which exceeded the maximum limit of 60 mg/l for any one sample.

Again, as U.S. Water Services has just taken over operation of this facility we cannot say what the exact cause of previous exceedences is. We are in the process of evaluating the facility and making adjustments to ensure the facility will be in compliance under our operation.

9. Deficiency – The TSS annual average result reported on the DMRs for the following months exceeded the maximum limit of 20 mg/l: October 2009, November 2009, December 2009, January 2010, February 2010, March 2010, April 2010, May 2010 and June 2010.

Please see the response to Items 7 and 8, this applies to this item as well. In reviewing the data up to May 2010 it stands to be expected that the TSS annual average will be above a 20 mg/l for several months based on previous results. We are awaiting the data for June through October.

If there are any questions or concerns regarding this letter, please contact me at 866-753-8292, ext. 246.

Sincerely,



Sharon Maluk
Compliance Quality Control
U.S. Water Services Corporation

CC: Charles Demenzes, President, Tradewinds Utilities