

State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

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

---

**DATE:** April 24, 2015  
**TO:** Carlotta Stauffer, Commission Clerk, Office of Commission Clerk  
**FROM:** John Villafrate, Senior Attorney, Office of the General Counsel  
**RE:** Docket Number 150019-WS - Joint application of GCP REIT III and Sun Communities Operating Limited Partnership for authority for transfer of majority organizational control of GCP Plantation Landings, LLC.

---

Please place the attached correspondence from Marty Deterding, on behalf of GCP REIT III/Sun Communities Operating Limited Partnership, in the above-referenced docket file.

JEV/as  
Attachment

## Ashley Soete

---

**From:** John Villafrate  
**Sent:** Friday, April 24, 2015 8:23 AM  
**To:** Ashley Soete  
**Subject:** FW: 150019 Staff's First Data Request  
**Attachments:** 20150423140958487.pdf

---

**From:** Marty Deterding [mailto:mdeterding@sfflaw.com]  
**Sent:** Thursday, April 23, 2015 2:54 PM  
**To:** John Villafrate  
**Cc:** Jennifer Crawford  
**Subject:** RE: 150019 Staff's First Data Request

John

I have talked to our Maintenance and operations people related to the Planation Landings system and the items raised in the Staff's First data request. We just recently completed a Polk County Sanitary inspection from 3/15 and nothing was said of outstanding concerns from an earlier inspection, However some of the items listed in Staff's data request were on this newer sanitary inspection. In working with the county on this latest inspection we have corrected all of the issues raised either through standard maint or in response to this latest sanitary survey. Therefore all issues raised have been completed or otherwise addressed in ways that we believe is fully satisfactory to the County.

Our representatives just talked with the County Health officials and we have corrected all items on the list. Additionally the official says that since we corrected issues on the March 15 report, that report supersedes the Feb '14 report.

The attached letter from last week is our response to this latest county survey. Please let me know if this is adequate for your needs of if there is something else I can provide.

**F. MARSHALL DETERDING**

*Of Counsel*

Sundstrom & Mindlin, LLP  
2548 Blairstone Pines Drive  
Tallahassee, Florida 32301  
T: 850.877.6555  
F: 850.656.4029  
[www.sfflaw.com](http://www.sfflaw.com)  
[mdeterding@sfflaw.com](mailto:mdeterding@sfflaw.com)





April 17, 2015

Matthew A. Nickerson  
Environmental Specialist II

Florida Department of Health in Polk County  
Environmental Engineering  
2090 East Clower Street  
Bartow, Florida 33830-6741

Reference: GCP Plantation Landings, LLC  
PWS ID no. 6531000

Subject: Sanitary Survey Deficiencies at Plantation Landings Water Treatment Plant

Mr. Nickerson,

We are in receipt of your sanitary survey deficiency report dated March 27, 2015. As requested, we are notifying the department of corrective measures to address the deficient items. Correction of deficient items is as follows:

1. Well Not properly sealed: Plantation Landings has engaged Dunham Well Drilling to reseal the casing and enlarge the vent pipe per your conversation with George Dunham.
2. Pesticide storage near well. All pesticides have been relocated to other facilities.
3. Unprotected Chlorine Storage tank. The correct lid has been placed on the tank.
4. Chlorine Injection line corroded. The CI injection line has been replaced.
5. Pressure relief valve not protected. A screen has been placed on the pressure relief valve to protect the opening.
6. Plant operator log deficiencies. General Utilities has corrected this recordkeeping issue and will maintain all logs in compliance with FAC Chapter 62-555.350(12)(a).
7. Valve exercising plan. A valve exercising program has been created. The plan is kept in the *Utility Guide* book in the Community Managers office. Program will be implemented in accordance with the plan and records of the program kept with the program.
8. Flushing Plan. A Flushing program has been created. The plan is kept in the *Utility Guide* book in the Community Managers office. Program will be implemented in accordance with the plan and records of the program kept with the program.
9. Cross Connection Control Plan. A copy of the cross connection control plan is attached. It had previously been approved by Polk County but was not accessible at the time of the inspection.

10. Updated distribution map. The best available records of the distribution system are now kept on site in the *Utility Guide*.
11. Emergency Response Plan. A new emergency response plan has been developed in accordance Chapter 62-555.350(15). The plan is stored in the *Utility Guide* in the community manager's office.
12. Records retention. All records will be retained in accordance with FAC Chapter 62-555.720. Records to be retained by both our operator and Sun Communities facilities.
13. Water system change of ownership. Attached is the requested change of ownership form. The information was changed with the FDEP; however we neglected to change with the DOH.

Sun Communities is committed to providing quality utility services to our residents and will continue to operate the system at the highest levels possible and in compliance with all regulatory requirements.

Please feel free to call me with any questions or if you would like to review any documents with me on site.

Best Regards,

A handwritten signature in black ink, appearing to read "Brad Pinover". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Brad Pinover  
Vice President Construction Services.  
813-503-6323  
bpinover@suncommunities.com