

COUNTRY WALK UTILITIES, INC.

FILED 4/19/2018
DOCUMENT NO. 03055-2018
FPSC - COMMISSION CLERK

April 19, 2018

Office of Commission Clerk
Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Docket No. 20180021-WU - Application of Country Walk Utilities, Inc. for Staff Assisted Rate Case in Highlands County – Third Supplemental Response to Staff’s First Data Request No. 13

Dear Commission Clerk,

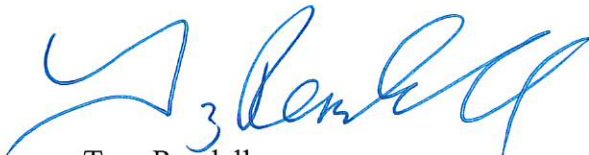
Please find attached Country Walk Utilities, Inc.’s (Country Walk) third supplemental response to Staff’s First Data Request No. 13.

13. A list of all service complaints received during the test year and four years prior to the test year. Please include an explanation of how each complaint was resolved.

Response: See attached.

If you have any questions, please do not hesitate to contact me at (727) 848-8292, ext. 245.

Respectfully Submitted,



Troy Rendell
Vice President
Investor Owned Utilities
// for Country Walk Utilities, Inc.

Troy Rendell

From: Troy Rendell
Sent: Thursday, April 19, 2018 8:41 AM
To: 'Arthur Ballard'; 'Paul Brand'
Cc: 'Tom Moran'; 'Vic Budd'; 'Linda Burkell'; 'barry'; 'Cookie Knox'; 'Sue Sylvester'
Subject: RE: Re: Country walk water quality

Good morning,

I respectfully disagree that the sulfides are not being removed. I've attached a test result taken on 09/06/17 which shows that the sulfide levels post treatment were "not detectable" which indicates that the new treatment system is removing the naturally occurring sulfides in the water as designed. Forced draft aeration with pH adjustments have proven to remove up to 90% of total sulfides. However, as previously explained at the HOA meetings, the sulfide issue has existed for numerous years, prior to the acquisition of the utility by Country Walk. It was previously explained that the previous owner also had issues with FDEP. **Prior to the recent installation of the aeration treatment**, the sulfides were previously oxidized utilizing higher levels of free chlorine. However, this caused exceedances in the disinfection byproducts (DBP) in the system. In order to address the water quality concerns and maintain the minimum chlorine residual in the distribution system, Country Walk utilized flushing of the distribution systems to maintain water quality. Due to the naturally occurring high sulfide content in the wells, the water had to be circulated in the distribution system to maintain the proper chlorine residual as required by FDEP. If the water is allowed to sit stagnant for any length of time, the residual hydrogen sulfide starts reforming and it exhibits a chlorine demand causing the residual to be reduced and ending with "rotten egg" smelly water and chlorine residuals lower than state requirements placing the utility in violation of Rule 62-555, Florida Administrative Code (F.A.C.). Again, this was **prior to** the installation of the new aeration treatment system.

Flushing is recognized as a normal maintenance practice of utilities to address water quality concerns throughout distribution systems in the United States. This is also recognized by the Florida Department of Protection (FDEP) as a common utility practice to address distribution system maintenance. Flushing is the most common and cost effective method of mitigation for this phenomenon. It is accomplished by flushing of the distribution system through blow-offs at dead ends or from flushing hydrants. In addition to regular flushing, upon complaints from specific areas, Country Walk institutes some emergency flushing that can provide immediate relief. Although flushing is the most immediate response to these issues, it only scours the build-up of naturally occurring minerals in the distribution system and did not provide a solution to the source of supply.

The residual hydrogen sulfides in the water distribution lines caused bacteria to begin feeding on the residuals. This interaction of the bacteria with the residual hydrogen sulfides also increased the chlorine demand in the water. In order to address both the rotten egg smell and the reduction in chlorine in the lines, the utility was forced to increase its flushing. This situation is exacerbated by the seasonality of the customer base. During the summer months, the Country Walk experiences a low customer population and low usage throughout the distribution system.

Thus, as previously explained, although the sulfides are now being removed at the source (treatment plant), there may still be residuals throughout the distribution system, as well as inside customers' homes and hot water heaters. This has accumulated over the period of years – again prior to the installation of the new treatment process. It is going to take time for the residuals to be removed throughout the distribution

system, as well as inside the customers' homes. Flushing of the customers' hot water heaters will also assist in this removal process. This will not be instantaneous.

There are several automatic flushers located throughout the Country Walk distribution system. The utility recently installed another automatic flusher to address customer concerns. Again, the utility is meeting all primary and secondary standards and is also below the DBP requirements set by FDEP.

Below is the table from FDEP Chapter 62-555.315(5)(a), Florida Administrative Code:

(a) Provide aeration or other appropriate treatment of the water from the new or altered well to remove total sulfide as necessary. Recommended types of aeration treatment for different water quality ranges are listed in the table below, which is incorporated herein as guidance and not as a requirement. Direct chlorination shall not be used to remove (i.e., oxidize) 0.3 mg/L or more of total sulfide unless the elemental sulfur formed during chlorination is removed.

POTENTIAL FOR IMPACTS WITHOUT TOTAL SULFIDE REMOVAL	WATER QUALITY RANGES	POTENTIAL WATER TREATMENT
Low	Total Sulfide < 0.3 mg/L Dissolved Iron < 0.1 mg/L1	Direct Chlorination2
Moderate	0.3 mg/L Total Sulfide 0.6 mg/L @ pH \leq 7.2 or 0.3 mg/L Total Sulfide 0.6 mg/L @ pH > 7.2	Conventional Aeration3 (maximum removal efficiency 40-50%) or Conventional Aeration with pH Adjustment4,5 (maximum removal efficiency 40-50%)
Significant	0.6 mg/L < Total Sulfide 3.0 mg/L @ pH 7.2 or 0.6 mg/L < Total Sulfide 3.0 mg/L @ pH > 7.2	Forced Draft Aeration3 (maximum removal efficiency 90%) or Forced Draft Aeration with pH Adjustment4,5 (maximum removal efficiency 90%)
Very Significant	Total Sulfide > 3.0 mg/L	Packed Tower Aeration with pH Adjustment4,5 (maximum removal efficiency > 90%)

1. High iron content raises concern if chlorination alone is used and significant dissolved oxygen exists in the source water. Filtration may be required to remove particulate iron prior to water distribution.
2. Direct chlorination of sulfide in water in the pH range normally found in potable sources produces elemental sulfur and increased turbidity. Finished-water turbidity should not be more than two nephelometric turbidity units greater than raw-water turbidity.
3. Increased dissolved oxygen entrained during aeration may increase corrosivity.
4. Reduction of alkalinity during pH adjustment and high dissolved oxygen entrained during aeration may increase corrosivity. Corrosion control treatment such as pH adjustment, alkalinity recovery, or use of inhibitors may be required.
5. High alkalinity will make pH adjustment more costly, and use of other treatment may be in order. Treatment that preserves the natural alkalinity of the source water may enhance the stability of finished water.

From: Arthur Ballard [mailto:ballard.arthur@yahoo.com]
Sent: Wednesday, April 18, 2018 8:46 PM
To: Troy Rendell; Paul Brand
Cc: Tom Moran; Vic Budd; Linda Burkell; barry; Cookie Knox; Sue Sylvester
Subject: Re: Re: Country walk water quality

The issue I have is the sulfides are not being removed, they are being precipitated along with other divalent cations to form a sludge which is plugging filters, shower heads and faucet heads.

Its not clear to me that passing this sludge which was formed in the scrubbing tower to customers is an acceptable practice.

Art Ballard

On Wednesday, April 18, 2018 03:35:14 PM EDT, Paul Brand <plb2280@gmail.com> wrote:

To all;

Is the next step having the water sample analysed? If it is not in compliance it would appear we would have some leverage here. But if it is in compliance, what would our next step be?

Tom, Vic and Art - is his description of our system accurate? Does it comply with state statutes?

I read his letter as saying, in some respects, we're going to pay 95% more for the quality of water we now have, including the sample.

Thank you all for your continuing efforts on behalf of all CW homeowners.

Paul

On Wed, Apr 18, 2018 at 11:20 AM, Troy Rendell <trendell@uswatercorp.net> wrote:

Good morning,

I discussed with the President of the utility and the utility manager. First and foremost, please understand that Country Walk Utilities is a small utility with a small customer base of approximately 71 customers. As previously discussed with the customers, the impact on water rates must be considered in any decision making.

Regarding the new treatment system - This is a forced draft aeration treatment system which is prescribed by Florida Department of Environmental Protection (FDEP) Rule 25-555.315(5)(a), Florida Administrative Code. The levels of sulfides in the source ground water rise to the level which requires forced draft aeration with pH adjustment. We worked closely with both the Homeowners Association and the FDEP on this project, which was placed into service last year. Country Walk Utilities spent approximately \$134,343.64 on the project. The actual costs were higher than that amount, but U.S. Water Services did not charge all of the costs to the utility in order to keep the rate impact at a minimum. We have had some components failures and have either replaced them or are in the process of replacing these components through the warranty. The utility still has some work to do on the equipment, particularly the control panel components that control the blower and VFD. The utility has received little to no water quality complaints, and have been told that it is the best water the customers have tasted. There is no need or requirement for an additional filter. Filters would require backwash with no means to dispose of the backwash water – as there is no wastewater plant. In addition, this would require an Industrial Wastewater Discharge Permit with the FDEP which is costly. Cartridge filters would be costly and would have no added benefits. Individual homeowners may chose to install additional home filters if they would like additional filtration. Cartridges will remove any supplemental components that may remain in the water. However, the forced draft aeration is working properly and is removing the sulfides in the water as designed. Country Walk Utilities is currently meeting **all** primary and secondary water quality standards. In fact with the addition of the new treatment system, the utility was able to lower the chlorine

SHORT Environmental Laboratories, Inc.

10405 U.S. 27 S. Sebring, FL 33876 email: Shortlab@strato.net

Phone: (863) 655-4022 (800) 833-4022 Fax: (863) 655-5820



Report Cover Page

Client: U.S. Water Services, Corp. Report #: 2017090099
Address: 4939 Cross Bayou Blvd. Report Date: 9/22/2017
City, State, Zip: New Port Richey, FL 34652
Attention: Melisa Rotteveel
Project: Country Walk
Sulfide Analyses
Sample Date: 09/06/2017
Sample Numbers: 1710203

This report package includes the following contents and attachments:

Commonly used Qualifiers with explanations:

<u>Contents</u>	<u>Item</u>	<u>Pages</u>	<u>Qualifier</u>	<u>Explanation</u>
Cover Page:		1	U	Compound was analyzed for but not detected.
Report of Analysis:	Original	4	I	Result is between the MDL and the PQL.
Attachments:			Q	Sample was analyzed out of holding time.
			J	Estimated value; may not be accurate.
Total Pages:		5		

The results contained in the report meet all requirements of the NELAC standards. All results are representative of the sample as collected. Direct all questions to the signatory below at the phone number above.

Respectfully Submitted,

Chad Harmon
Project Manager
Sep 22 2017 10:36 AM

This report is for the exclusive and private use of the client listed above and recipients designated by the client. If reproduced in whole or in part by authorized recipients, this cover sheet should accompany any such copies.

Unless noted otherwise, all analyses performed by Florida Spectrum Environmental Labs.



FL CERTS
#86006
#84088
#86618

F4

171110

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

PUBLIC WATER SYSTEM INFORMATION (to be completed by sampler - Please type or print legibly)

System Name: Country Walk PWS I.D. #: 628411U
System Type (check one): Community NonTransient Noncommunity Transient NonCommunity
Address: Country Walk WTP
City: Lake Placid State: Florida ZIP Code: _____
Phone#: 727-848-8292 Fax #: 727-849-4219 E-Mail Address: Dkibitlowski@uswatercorp.net

SAMPLE INFORMATION (to be completed by sampler)

Sample Number: 1 Sample Date: 9-6-17 Sample Time: 1130
Sample Location (be specific): POE (Hydro tank)
Disinfectant Residual (Required when reporting results for trihalomethanes and haloacetic acids): 2.6 mg/L Field pH: 8.6

Sample Type (Check Only One)

Reason(s) for Sample (Check all that apply)

- | | | |
|---|---|--|
| <input type="checkbox"/> Distribution | <input type="checkbox"/> Routine Compliance (with 62-550) | <input type="checkbox"/> Quarterly (Which One?) |
| <input type="checkbox"/> Entry Point (to Distribution) | <input type="checkbox"/> Confirmation of MCL Exceedance* | <input type="checkbox"/> Special (not for compliance with 62-550.) |
| <input type="checkbox"/> Plant Tap (not for compliance with 62.550) | <input type="checkbox"/> Composite Multiple Sites** | <input type="checkbox"/> Violation Resolution |
| <input type="checkbox"/> Raw (at well intake) | <input type="checkbox"/> Clearance (permitting) | <input type="checkbox"/> Replacement (of invalidated Sample) |
| <input type="checkbox"/> Max. Residence Time | <input checked="" type="checkbox"/> Other: <u>total sulfide</u> | |
| <input type="checkbox"/> Ave. Residence Time | Sampling Procedure Used or other Comments: _____ | |
| <input type="checkbox"/> Near First Customer | | |

*See 62-550.500(6) for requirements and restrictions and 62-550.513(3) for nitrate or nitrite exceedances..

** See 62-550.550(4) for requirements and attach a results page for each site.

SAMPLER CERTIFICATION

I, Andrew Barreman, Operator, do HEREBY CERTIFY
(Print Name) (Print Title)

that the above public water system and sample collection information is complete and correct.

Signature: Andy Barreman Date: 9-6-17

Certified Operator #: C22604 Phone #: 772-212-5399 Sampler's FAX #: _____

Sampler's E-mail: abarreman@uswatercorp.net



Report To:
 David Murto
 Short Environmental Labs
 10405 US Hwy 27 South
 Sebring FL, 33876

Page 1 of 2
 Report Printed: 9/18/2017
 Work Order # 1710203
 Project:
 578 US Water Country Walk Sulfide

Well 1

Lab ID: 1710203-01
 Client Sample ID: Well 1
 Matrix: Water

Collection Date: 09/06/17 11:30
 Received Date: 09/07/17 17:00
 Collected By: Andrew Borremas

Laboratory Analysis Report

Parameter	Result	QC	Units	Dil	MDL	PQL	Method	Date Ext.	Date Analy.	Analyst
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Wet Chemistry

Sulfide~	ND	J3, U	mg/L	1	0.0100	0.0300	SM 4500-S D	09/12 11:33	09/12 11:33	LLC
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Florida-Spectrum Environmental Services, Inc.
 1460 W. McNab Road, Fort Lauderdale, FL 33309

Pembroke Laboratory
 528 Gooch Rd.
 Fort Mead, FL 33841

Big Lake Laboratory
 610 Parrot Ave. N.
 Okeechobee, FL 34972

Spectrum Laboratories
 630 Indian St.
 Savannah, GA 31401



Report To:
 David Murto
 Short Environmental Labs
 10405 US Hwy 27 South
 Sebring FL, 33876

Page 2 of 2
 Report Printed: 9/18/2017
 Work Order # 1710203
 Project:
 578 US Water Country Walk Sulfide

Well 1

Notes and Definitions

- U Indicated that the compound was analyzed for but not detected. This shall be used to indicate that the specific component was not detected. The value associated with the qualifier shall be the laboratory method detection limit.
- J3 The matrix spike recovery outside method acceptance limits indicating matrix interference.
- DET Analyte DETECTED
- ND Analyte NOT DETECTED at or above the detection limit
- NR Not Reported
- dry Sample results reported on a dry weight basis
- RPD Relative Percent Difference
- V Indicated that the analyte was detected in both the sample and the associated method blank.
- I The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
- Z Too many colonies were present for accurate counting.

QC=Qualifier Codes as defined by DEP 62-160
 Unless indicated, soil results are reported on actual (wet) weight basis.
 Work performed by outside (subcontracted) labs denoted by SUB in Analyst Field.

Results relate only to this sample.

Suresh (Bobby) Supan - CSM

x

Authorized CSM Signature (954) 978-6400
 Florida-Spectrum Environmental Services, Inc.
 Certification# E86006

All NELAP certified analysis are performed in accordance with Chapter 64E-1 Florida Administrative code, which has been determined to be equivalent to NELAC standards. Analysis certified by programs other than NELAP are designated with a "-".

Florida-Spectrum Environmental Services, Inc.
 1460 W. McNab Road, Fort Lauderdale, FL 33309

Pembroke Laboratory
 528 Gooch Rd.
 Fort Mead, FL 33841

Big Lake Laboratory
 610 Parrot Ave. N.
 Okeechobee, FL 34972

Spectrum Laboratories
 630 Indian St.
 Savannah, GA 31401

FLORIDA-SPECTRUM ENVIRONMENTAL SERVICES, INC.

1460 W. McNab Road
Ft. Lauderdale, FL 33309

Phone: 954.978.6400
Fax: 954.978.2233

1710203

Bottle ID F4

Client Name **SHORT ENVIRONMENTAL LABORATORIES, INC.** Contact / Phone: 863-655-4022

Project Name / Location **578 US Water Country Walk Sulfide** Turn Around Time Requested (*Surcharges may apply)
24 Hour 48 Hour 5 Bus. Days 10 Bus. Days

Samplers: (Signature) Andrew Borremons

Lab Use Only Sample No.	Sample Description	Date	Time	Matrix	Well	Grab	PARAMETER / CONTAINER DESCRIPTION										No. of Containers (Total per each location)					
							S&M 1 L Plastic ZnAc NaOH															
01	Well 1	09/06/17	1130	DW		X	Total Sulfide	1													1	

Report Page ___ of ___

Containers Prepared/Relinquished: <i>[Signature]</i>	Date/Time: 9-6-17 1154	Received: <i>[Signature]</i>	Date/Time: 9-7-17 1230	Seal intact?	Y N N/A	Only certified to run Sulfide in Non-Potable water. per Dave - OK to Run
Relinquished: <i>[Signature]</i>	Date/Time: 9-7-17 1440	Received: <i>[Signature]</i>	Date/Time: 9-7-17 1530	Samples intact upon arrival?	Y N N/A	
Relinquished: <i>[Signature]</i>	Date/Time: 9-7-17 17:00	Received: <i>[Signature]</i>	Date/Time: 9-7-17 1700	Received on ice? Temp 52	Y N N/A	
Relinquished: <i>[Signature]</i>	Date/Time:	Received:	Date/Time:	Proper preservatives indicated?	Y N N/A	
Relinquished:	Date/Time:	Received:	Date/Time:	Rec'd w/in holding time?	Y N N/A	
Relinquished:	Date/Time:	Received:	Date/Time:	Volatiles rec'd w/out headspace?	Y N N/A	
Relinquished:	Date/Time:	Received:	Date/Time:	Proper containers used?	Y N N/A	

Page 3 of 4

Chain of Custody.xls
Rev. Date 11/19/01