

TKCB, INC.
5600 NORTH COCOA, BLVD.
COCOA, FL 32927
(321) 639-1124

July 29, 2021

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

**Re: Docket No. 20210120-SU – Application for a limited alternative rate case proceeding,
by TKCB, Inc.**

Please find attached TKCB, Inc's (Utility) response to Staff's First Data Request dated July 14, 2021, in the above referenced docket.

Plant operational questions, concerning this response, may be directed to our plant operator, David Whiteside, of Accurate Utilities, Inc. at, 772-216-4277. All other questions should be directed to me at, 407-690-2647.

Respectfully Submitted,



Jeffery Small
OCBOA Consulting, LLC
on behalf of ///

Thad A. Terry
President
TKCB, Inc.

STAFF'S FIRST DATA REQUEST – UTILITY RESPONSE

Question No. 1

Noting that a previously unknown backup was discovered leading to approximately 8,000 more gallons of sludge removal in the first half of 2021 (as compared to the test year), please elaborate on the 32,000 gallons of sludge removal estimated to be necessary in the latter half of 2021. (Reference application pages 8 and 40.)

Utility Response

The additional sludge removal is triggered from too many solids in the aeration tanks causing a significant amount of foaming and operating concerns with sludge bulking in the clarifier. See attached **Exhibit 1** for a typical example of this issue.

Question No. 2

Does the Utility expect the same level of sludge hauling (52,000 gallons per year) to be required on a yearly basis going forward? If no, what is the estimated gallonage of sludge hauling the Utility expects going forward? (Reference application page 8.)

Utility Response

Continuing with the excess sludge removal is paramount to getting the MLVSS back into a normal range for a typical activated sludge treatment process and to prevent sludge bulking in the clarifier. Yes, we need to continue on a yearly basis based on our experience with other WWTF of this size and category. The MLVSS value should be between a range of 70 and 80 percent of the MLSS. TKCB's MLVSS is 100%. Thus, the reason for increasing wasting/hauling until these numbers fall back into range. TKCB's June 2021 DMR, as filed with the FDEP is attached as **Exhibit 2**. The results for a TVSS & MLSS wastewater sample, that was taken on June 15, 2021, is attached as **Exhibit 3**. TKCB anticipates hauling 4,000 gallons of sludge per month, or 48,000 gallons annually, from the WWTP, with an additional 4,000 gallons annually to maintain, clean and degrease the master lift station, going forward. The level of sludge removal may have to increase, if our efforts to reduce the amounts of solids in the aeration tanks, as described above, are unsuccessful.

Question No. 3

The Commission approved chemicals expense of \$511 in the Utility's last rate case and the Utility reported chemicals expenses of \$329 in its 2020 Annual Report. Please explain how the Utility arrived at chemicals expense of \$4,251 in the current docket. What are the estimated chemicals expense the Utility expects going forward? (Reference application pages 7, 11, and 55)

Utility Response

Accurate Utilities, Inc. cannot explain what chlorine consumption was being used under the prior plant operator. However, the minimum CL2 residual required by FDEP is 0.5 mg/l leaving the final effluent to meet permit conditions (See page 60 of TKCB's LARI application). TKCB estimates that it will require 1,300 gallons of chlorine annually, or chemical expenditures of \$4,251, for the test year, and subsequent years going forward.

Question No. 4

The Commission approved materials and supplies expense of \$842 in the Utility's last rate case and the Utility reported material and supplies expense of \$2,034 in its 2020 Annual Report. Please explain how the Utility arrived at materials and supplies expense of \$4,684 in the current docket. What are the estimated materials and supplies expense the Utility expects going forward? (Reference application pages 7 and 29)

Utility Response

Materials and supplies expense are recorded from the contract operators monthly service invoice. They represent the materials and parts needed on a recurring basis to maintain wastewater plant operation. By their nature, they are unpredictable and fluctuate on a monthly basis. TKCB's filing includes six-months of actual costs and six-months of projected costs for the test year 2021. The \$4,684 requested was calculated as two-times the actual six-month costs for this period. It has become apparent, based on conversations with the new contract operator, that TKCB's wastewater plant has not been properly maintained on a proactive basis for a number of years. TKCB believes that it will take time to "catch-up" on the routine maintenance requirements of the WWTP, in addition to the recurring maintenance items as they occur. Major repairs, such as those exceeding \$1,000, or repairs that are considered non-recurring, are recorded as deferred assets and amortized over five years, per Rule 25-30.433(9), F.A.C. TKCB estimates materials and supplies expenditures of \$4,684 for the test year, and, with annual amounts of \$4,000 to \$5,000, going forward.

Question No. 5

Please provide additional information related to the "abrupt change in operator service that occurred" earlier this year. Is the impact of the change limited to the additional expense requested in contractual services-other (Acct. 736), or does it also impact additional O&M accounts? (Reference application page 2.)

Utility Response

The prior plant operator notified TKCB on, February 10, 2021, that he would no longer service the WWTP, effectively immediately. Due to the abrupt nature of this notification, TKCB was forced to find a new plant operator in a short period of time. Based on the prior operator's recommendation, and the lack of time to vet other operators, TKCB entered into a contract with Accurate Utilities, Inc. (See page 46 of TKCB's LARI application). The contract was effective March 1, 2021, however, Accurate Utilities, Inc. actually commenced operations at the WWTP on February 15, 2021, (See page 38 of TKCB's LARI application). The impact of this change affects several O&M expense accounts due to the nature and level of the services the new operator provides or determines.

Acct. No. 711 – Sludge

The operator determines the timing and the volume of sludge/solids that are needed to be removed from the WWTP. Sludge is hauled by a third-party vendor and it is recorded in this account.

Acct. No. 735 – Chemicals

The operator determines and provides the amount of chlorine that is needed to treat the wastewater effluent based on FDEP requirements and TKCB's wastewater permit. Chlorine is supplied to TKCB by the operator and it is recorded in this account.

Acct. No. – 720 – Materials & Supplies

The operator determines and provides the recurring maintenance and repair services to the WWTP. The recurring parts and supplies provided to TKCB, by the operator, are recorded in this account.

Acct. No. 735-Testing

The operator provides the monthly, semi-annual, and annual wastewater testing, as required by TKCB’s wastewater permit. The wastewater testing supplied to TKCB, by the operator, is recorded in this account.

Acct. No. 736- Contractual Services – Other

The operator’s month service fee, the general labor associated with recurring maintenance, and the monthly fuel charge, as determined by TKCB’s contact for operator services, is recorded in this account.

Question No. 6

Please explain the “2021 186 Deferred Charges,” which have been included in the total actual/estimate for Account 736, and how the deferred charges were calculated. (Reference application page 29.)

Utility Response

Page 29 of TKCB’s LARI application includes \$2,245 of “186 Deferred Charges” for the test year 2021. The support for this amount comes from the “O&M 186 Cost” schedule located on page 48 of TKCB’s LARI application. The specific line-item cost is shown below.

Item	Deferred Maintenance Item	Total Cost	Amtz. Period	Amtz. Amount
1	Repair WWTP Wall	\$4,000.00	4yrs	\$1,000.00
2	Repair & Replace Fittings PVC	\$725.00	5yrs	\$145.00
3	Air diffusers on Digesters	\$400.00	5yrs	\$80.00
4	Brace RAS Line x 3	\$2,750.00	5yrs	\$550.00
5	RAS/WAS collection Box	\$1,850.00	5yrs	\$370.00
6	Forced Main	\$500.00	5yrs	\$100.00
	Total	\$10,225.00		\$2,245.00

Item 1 was a project to repair 3 structural leaks in the WWTP that was invoiced in 2020. TKCB recorded this deferred maintenance project to Acct 186.1 and is amortizing the total amount over a four-year period based on the consultant’s recommendation. The invoice is attached as **Exhibit 4** of this response.

Items 2-6 are maintenance projects identified by TKCB’s new plant operator, Accurate Utilities, Inc., that are critical in nature and that need to be completed within the proforma test year 2021 to ensure the continued and safe operation of the WWTP. The projects, totaling \$6,225, will be performed in-house by Accurate Utilities Inc., and are based on the operators estimate of repairs need, which is included on page 55 of TKCB’s LARI application. Pictures with an explanation, of some of the repairs, are attached as **Exhibit 5** of this response.

Question No. 7

The following items relate to the Utility's requested rate case expense.

- a. *For each individual person, in each firm providing consulting services to the applicant pertaining to this docket, provide the billing rate (if different from filing), and an itemized description of work performed. Please provide detail of hours worked associated with each activity and the hourly rate.*
- b. *For each firm or consultant providing services, please provide copies of all invoices for services provided to date.*
- c. *If consultant invoices are not broken down by hour, please provide a report that details actual duties performed, times associated with those activities, and amount incurred to date.*

Please provide an estimate of costs to complete the case for each consultant or employee, including a description of estimated work to be performed, and detail of the estimated remaining expense to be incurred through the Proposed Agency Action (PAA) process.

Utility Response

- a. There are two individuals providing consulting services for TKCB's LARI filing. The hourly rates are as stated in the filing.
 - i. Jeffery Small, of OCBOA, Consulting, LLC, who, has prepared the LARI filing, and, has/will provide, coordinate, and represent the Utility's response and position to Staffs inquires and findings throughout this proceeding.
 - ii. David Whiteside, of Accurate Utilities, Inc., who, has/will prepare responses related to the operational needs and the FDEP requirements of the WWTP for this proceeding.
- b. All invoices for consultant's rate case expense, to date, are attached as **Exhibit 6** of this response.

Accurate Utilities, Inc.

Invoice No. 55636, dated 7/21/21, for 3 hours, totaling \$315.

OCBOA Consulting, LLC

Invoice No. 21.022, dated 6/30/21, for 7 hours at \$95/hour with billables of \$50, totaling \$715.

Invoice No. 21.024, dated 7/31/21, for 7 hours at \$95/hour with billables of \$47, totaling \$712.

- c. The invoices contain all of the requested information.

The estimated cost to complete, through the PAA process, remains the same as originally filed. TKCB will file copies of all invoices as received for these services to the docket file. A final estimate for the cost to complete will be provided prior to Staff's final recommendation.

Vendor	Rate/ Hour	Original Estimate		Completed to Date		Estimate to Complete	
		Hours	Amount	Hours	Amount	Hours	Amount
OCBOA	\$95	20	\$1,900	14	\$1,330	6	\$570
(billables)	various		\$0		\$97		
ACCURATE	\$105	8	\$840	3	\$315	5	\$525
Total		28	\$2,740	17	\$1,742	11	\$1,095

The 11 hours estimate to complete is for additional responses to Staff's information request and to review Staff's recommendation for the agenda with the Utility. The estimate to complete does not include OCBOA's time or travel, for the agenda conference, if required.

EXHIBIT 1



Picture was taken on July 26, 2021

TKCB, Inc.
Response to Staff's First Data Request
Docket No. 20210120-SU

EXHIBIT 2

June 2021 DMR's follow

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed mail this report to: Department of Environmental Protection, 3319 Maguire Blvd, Suite 232, Orlando, FL 32803-3767

PERMITTEE NAME: Sun Lake Estates Homeowners Association
 MAILING ADDRESS: 5600 N US Highway 1
 Cocoa, Florida 32927-

PERMIT NUMBER:

FLA010353-006-DW3P

Effective Date: October 28, 2015
 Expiration Date: October 27, 2020
 REPORT FREQUENCY: Monthly
 PROGRAM: Domestic

FACILITY: Sun Lake Estates WWTF
 LOCATION: 616 Emerald Lake Drive
 Cocoa, FL 32926-4648

LIMIT:
 CLASS SIZE:
 MONITORING GROUP NUMBER:
 MONITORING GROUP DESCRIPTION:
 RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING PERIOD From:

Final
 N/A
 R-001
 Rapid Infiltration Basin, including Influent

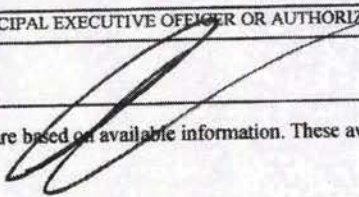
COUNTY: Brevard

June 1st 2021 To: June 30th 2021

OFFICE: Central District

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Flow (Flow to R-001)	Sample Measurement		0.044	MGD					0	5 Days/Week	Flow Totalizer
PARM Code 50050 Y Mon. Site No. FLW-1	Permit Requirement		0.099 (An.Avg.)	MGD					0	5 Days/Week	Flow Totalizer
Flow (Flow to R-001)	Sample Measurement		0.023	MGD					0	5 Days/Week	Flow Totalizer
PARM Code 50050 1 Mon. Site No. FLW-1	Permit Requirement		Report (Mo.Avg.)	MGD					0	5 Days/Week	Flow Totalizer
BOD, Carbonaceous 5 day, 20C	Sample Measurement					4.11		mg/l	0	Monthly	Grab
PARM Code 80082 Y Mon. Site No. EFA-1	Permit Requirement					20.0 (An.Avg.)		mg/L	0	Monthly	Grab
BOD, Carbonaceous 5 day, 20C	Sample Measurement				5.46	5.46	5.46	mg/l	0	Monthly	Grab
PARM Code 80082 A Mon. Site No. EFA-1	Permit Requirement				60.0 (Max.)	45.0 (Max. Wk. Avg.)	30.0 (Mo. Avg.)	mg/L	0	Monthly	Grab
Solids, Total Suspended	Sample Measurement					5.00		mg/l	0	Monthly	Grab
PARM Code 00530 Y Mon. Site No. EFA-1	Permit Requirement					20.0 (An.Avg.)		mg/L	0	Monthly	Grab
Solids, Total Suspended	Sample Measurement				6.38	6.38	6.38	mg/l	0	Monthly	Grab
PARM Code 00530 A Mon. Site No. EFA-1	Permit Requirement				60.0 (Max.)	45.0 (Max. Wk. Avg.)	30.0 (Mo. Avg.)	mg/L	0	Monthly	Grab

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)
Jeffrey M. Tuttle Operator		772-201-3706	07/08/2021

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here): Averages shown are based on available information. These averages are based on 10 nonconsecutive months of information.

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Sun Lake Estates WWTF

MONITORING GROUP R-001
NUMBER:
MONITORING PERIOD From: June 1st 2021 To: June 30th 2021

PERMIT NUMBER: FLA010353-006-DW3P

Parameter		Quantity or Loading	Units	Quality or Concentration		Units	No. Ex.	Frequency of Analysis	Sample Type
Coliform, Fecal	Sample Measurement			1.81		#/100ml	0	Monthly	Grab
PARM Code 74055 Y Mon. Site No. EFA-1	Permit Requirement			200 (An.Avg.)		#/100mL	0	Monthly	Grab
Coliform, Fecal	Sample Measurement			1.00	1.00	#/100ml	0	Monthly	Grab
PARM Code 74055 A Mon. Site No. EFA-1	Permit Requirement			Report (Mo.Geo.Mn.)	800 (Max.)	#/100mL	0	Monthly	Grab
pH	Sample Measurement		7.4		7.6	s.u.	0	5 Days/Week	Grab
PARM Code 00400 A Mon. Site No. EFA-1	Permit Requirement		6.0 (Min.)		8.5 (Max.)	s.u.	0	5 Days/Week	Grab
Chlorine, Total Residual (For Disinfection)	Sample Measurement		.5			mg/l	0	5 Days/Week	Grab
PARM Code 50060 A Mon. Site No. EFA-1	Permit Requirement		0.5 (Min.)			mg/L	0	5 Days/Week	Grab
Nitrogen, Nitrate, Total (as N)	Sample Measurement				.0963	mg/l	0	Monthly	Grab
PARM Code 00620 A Mon. Site No. EFA-1	Permit Requirement				12.0 (Max.)	mg/L	0	Monthly	Grab
Nitrogen, Total	Sample Measurement			13.94		mg/l	0	Monthly	Grab
PARM Code 00600 Y Mon. Site No. EFA-1	Permit Requirement			Report (An.Avg.)		mg/L	0	Monthly	Grab
Nitrogen, Total	Sample Measurement				19.8	mg/l	0	Monthly	Grab
PARM Code 00600 A Mon. Site No. EFA-1	Permit Requirement				Report (Mo.Avg.)	mg/L	0	Monthly	Grab
Phosphorus, Total (as P)	Sample Measurement			2.987		mg/l	0	Monthly	Grab
PARM Code 00665 Y Mon. Site No. EFA-1	Permit Requirement			Report (An.Avg.)		mg/L	0	Monthly	Grab
Phosphorus, Total (as P)	Sample Measurement				8.52	mg/l	0	Monthly	Grab
PARM Code 00665 A Mon. Site No. EFA-1	Permit Requirement				Report (Mo.Avg.)	mg/L	0	Monthly	Grab
Flow (Total Through Plant)	Sample Measurement	0.044	MGD				0	5 Days/Week	Flow Totalizer
PARM Code 50050 P Mon. Site No. FLW-1	Permit Requirement	0.099 (An.Avg.)	MGD				0	5 Days/Week	Flow Totalizer

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Sun Lake Estates WWTF

MONITORING GROUP NUMBER:
MONITORING PERIOD

R-001

From: June 1st 2021 To:

PERMIT NUMBER: FLA010353-006-DW3P

June 30th 2021

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Flow (Total Through Plant)	Sample Measurement	.0294	0.032	MGD				0	5 Days/Week	Flow Totalizer	
PARM Code 50050 Q Mon. Site No. FLW-1	Permit Requirement	Report (Qt.Avg.)	Report (Mo.Avg.)	MGD				0	5 Days/Week	Flow Totalizer	
Percent Capacity, (TMADF/ Permitted Capacity) x 100	Sample Measurement					33	Percent	0	Monthly	Calculated	
PARM Code 00180 P Mon. Site No. CAL-1	Permit Requirement					Report (Mo.Avg.)	percent	0	Monthly	Calculated	

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed mail this report to: Department of Environmental Protection, 3319 Maguire Blvd, Suite 232, Orlando, FL 32803-3767

PERMITTEE NAME: Sun Lake Estates Homeowners Association
 MAILING ADDRESS: 5600 N US Highway 1
 Cocoa, Florida 32927-

PERMIT NUMBER: FLA010353-006-DW3P

FACILITY: Sun Lake Estates WWTF
 LOCATION: 616 Emerald Lake Drive
 Cocoa, FL 32926-4648

LIMIT: Final
 CLASS SIZE: N/A
 MONITORING GROUP NUMBER: R-001
 MONITORING GROUP DESCRIPTION: Rapid Infiltration Basin, including Influent

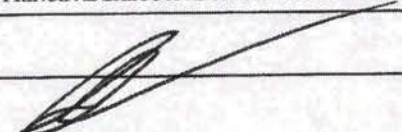
REPORT FREQUENCY: Annually
 PROGRAM: Domestic

COUNTY: Brevard
 OFFICE: Central District

RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING PERIOD From: January 1st 2021 To: December 31st 2021

Parameter		Quantity or Loading	Units	Quality or Concentration	Units	No. Ex.	Frequency of Analysis	Sample Type
BOD, Carbonaceous 5 day, 20C (Influent) PARM Code 80082 G Mon. Site No. INF-1	Sample Measurement				mg/l	0	Annually	Grab
	Permit Requirement			Report (Mo.Avg.)	mg/L	0	Annually	Grab
Solids, Total Suspended (Influent) PARM Code 00530 G Mon. Site No. INF-1	Sample Measurement				mg/l	0	Annually	Grab
	Permit Requirement			Report (Mo.Avg.)	mg/L	0	Annually	Grab

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)
Jeffrey M. Tuttle Operator		772-201-3706	03/17/2021

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed mail this report to: Department of Environmental Protection, 3319 Maguire Blvd, Suite 232, Orlando, FL 32803-3767

PERMITTEE NAME: Sun Lake Estates Homeowners Association
 MAILING ADDRESS: 5600 N US Highway 1
 Cocoa, Florida 32927-

PERMIT NUMBER: FLA010353-006-DW3P

LIMIT: Final
 CLASS SIZE: N/A
 MONITORING GROUP NUMBER: RMP-Q
 MONITORING GROUP DESCRIPTION: Biosolids Quantity
 RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING PERIOD From: June 1st 2021 To: June 30th 2021

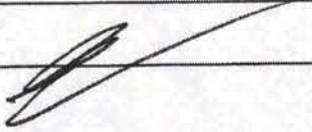
REPORT FREQUENCY: Monthly
 PROGRAM: Domestic

FACILITY: Sun Lake Estates WWTF
 LOCATION: 616 Emerald Lake Drive
 Cocoa, FL 32926-4648

COUNTY: Brevard
 OFFICE: Central District

Parameter		Quantity or Loading	Units	Quality or Concentration	Units	No. Ex.	Frequency of Analysis	Sample Type
Biosolids Quantity (Transferred)	Sample Measurement	0.008	dry tons			0	Monthly	Calculated
PARM Code B0007 + Mon. Site No. RMP-1	Permit Requirement	Report (Mo.Total)	dry tons			0	Monthly	Calculated
Biosolids Quantity (Landfilled)	Sample Measurement	000	dry tons			0	Monthly	Calculated
PARM Code B0008 + Mon. Site No. RMP-1	Permit Requirement	Report (Mo.Total)	dry tons				Monthly	Calculated

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)
Jeffrey M. Tuttle Operator		772-201-3706	07/08/2021

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):

DAILY SAMPLE RESULTS - PART B

Permit Number:
Monitoring Period

FLA010353-006-DW3P
From: June 1st 2021

To: June 30th 2021

Facility: Sun Lake Estates WWTF

	BOD, Carbonaceous 5 day, 20C mg/L	Chlorine, Total Residual (For Disinfection) mg/L	Coliform, Fecal #/100mL	Nitrogen, Nitrate, Total (as N) mg/L	Nitrogen, Total mg/L	Phosphorus, Total (as P) mg/L	Solids, Total Suspended mg/L	pH s.u.	Flow (Flow to R-001) MGD
Code	80082	50060	74055	00620	00600	00665	00530	00400	50050
Mon. Site	EFA-1	EFA-1	EFA-1	EFA-1	EFA-1	EFA-1	EFA-1	EFA-1	FLW-1
1		1.1						7.4	.041
2		2.6						7.5	.030
3		6.9						7.6	.024
4		3.1						7.6	.041
5		2.5						7.6	.004
6									.018
7		0.5						7.5	.018
8		1.9						7.6	.014
9		.8						7.6	.028
10		.9						7.7	.018
11		1.5						7.6	.020
12		.9						7.6	.020
13									.020
14		1.4						7.8	.019
15		2.3						7.6	.019
16		1.0						7.4	.028
17		3.6						7.5	.019
18		4.1						7.5	.016
19		2.6						7.5	.024
20									.028
21		2.1						7.5	.028
22		1.9						7.6	.024
23	5.46	3.0	1.00	0.0570	19.8	8.52	6.38	7.5	.019
24		2.4						7.6	.032
25		2.0						7.5	.017
26		2.0						7.5	.026
27									.026
28		1.6						7.6	.020
29		2.0						7.4	.018
30		2.6						7.6	.022
31									
Total	1	26	1	1	1	1	1	26	0.675
Mo. Avg.	5.46	2.2	1.00	0.0570	19.8	8.52	6.38	7.5	.023

PLANT STAFFING:

Day Shift Operator	Class: <u>C</u>	Certificate No: <u>8655</u>	Name: <u>Jeffrey M. Tuttle</u>
Evening Shift Operator	Class: _____	Certificate No: _____	Name: _____
Night Shift Operator	Class: _____	Certificate No: _____	Name: _____
Lead Operator	Class: _____	Certificate No: _____	Name: _____

GROUNDWATER MONITORING REPORT - PART D

Facility Name: Sun Lake Estates WWTF
 Permit Number: FLA010353-006-DW3P
 County: Brevard

Monitoring Well ID: MWB-1
 Well Type: Background
 Description: SUN LAKE
 ESTATES/BACK
 GMS3005A14849

Report Frequency: Semi-annually
 Program: Domestic

Office: Central District

Re-submitted DMR:

Monitoring Period From: January 1 2021 To: June 30th 2021

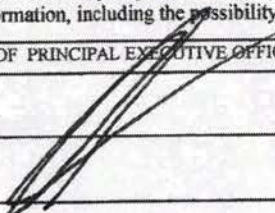
Date Sample Obtained: June 24 2021

Time Sample Obtained: 12:20:00

Was the well purged before sampling? Yes No

Parameter	PARAM Code	Sample Measurement	Permit Requirement	Units	Sample Type	Frequency of Analysis	Detection Limits	Analysis Method	Sampling Equipment Used	Samples Filtered (L/F/N)
Water Level Relative to NGVD	82545	8.86	Report	ft	In Situ	Semi-annually		Tape Measure	Bailer	N
Nitrogen, Nitrate, Total (as N)	00620	10.3	Report	mg/L	Grab	Semi-annually	90.00-110.00	TotNit	Bailer	N
Solids, Total Dissolved (TDS)	70295	580	Report	mg/L	Grab	Semi-annually		SM2540 C	Bailer	N
Chloride (as Cl)	00940	180	Report	mg/L	Grab	Semi-annually	80.00-120.00	SM4500-Cl E	Bailer	N
Coliform, Fecal	74055	1.00	Report	#/100mL	Grab	Semi-annually		COLILERT-18	Bailer	N
pH	00400	7.2	Report	s.u.	Grab	Semi-annually		Field test	Bailer	N
Turbidity	00070	290	Report	NTU	Grab	Semi-annually	50.00-150.00	EPA180.1	Bailer	N

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)
Jeffrey M Tuttle Operator		772-201-3706	07/13/2021

COMMENTS AND EXPLANATION (Reference all attachments here):

GROUNDWATER MONITORING REPORT - PART D

Facility Name: Sun Lake Estates WWTF
 Permit Number: FLA010353-006-DW3P
 County: Brevard

Monitoring Well ID: MWC-3
 Well Type: Compliance
 Description: SUN LAKE
 ESTATES/COMP.
 GMS3005A14851

Report Frequency: Semi-annually
 Program: Domestic

Office: Central District

Re-submitted DMR:

Monitoring Period

From: January 1st 2021 To: June 30th 2021


Date Sample Obtained: 06/24/2021

Time Sample Obtained: 12:50:00

Was the well purged before sampling? Yes No

Parameter	PARAM Code	Sample Measurement	Permit Requirement	Units	Sample Type	Frequency of Analysis	Detection Limits	Analysis Method	Sampling Equipment Used	Samples Filtered (L/F/N)
Water Level Relative to NGVD	82545	6.083	Report	ft	In Situ	Semi-annually		Measurement	Tape measure	N
Nitrogen, Nitrate, Total (as N)	00620	2.38	10	mg/L	Grab	Semi-annually	90.00-110.00	TotNit	Bailer	N
Solids, Total Dissolved (TDS)	70295	116	500	mg/L	Grab	Semi-annually		SM2540 C	Bailer	N
Chloride (as Cl)	00940	14.5	250	mg/L	Grab	Semi-annually	80.00-120.00	SM4500-Cl E	Bailer	N
Coliform, Fecal	74055	1.00	4	#/100mL	Grab	Semi-annually		COLILERT-18	Bailer	N
pH	00400	7.3	6.5-8.5	s.u.	Grab	Semi-annually		Field	Ph meter	N
Turbidity	00070	65.0	Report	NTU	Grab	Semi-annually	50.00-150.00	EPA180.1	Bailer	N

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)
Jeffrey M Tuttle Operator		772-201-3706	07/13/2021

COMMENTS AND EXPLANATION (Reference all attachments here):

GROUNDWATER MONITORING REPORT - PART D

Facility Name: Sun Lake Estates WWTF
 Permit Number: FLA010353-006-DW3P
 County: Brevard

Monitoring Well ID: MWI-2
 Well Type: Intermediate
 Description: SUN LAKE
 ESTATES/INTER.
 GMS3005A14850

Report Frequency: Semi-annually
 Program: Domestic

Office: Central District

Re-submitted DMR:

Monitoring Period From: January 1st 2021 To: June 30th 2021

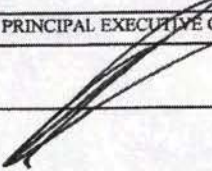
Date Sample Obtained: 6-24-2021

Time Sample Obtained: 12:40:40

Was the well purged before sampling? Yes No

Parameter	PARM Code	Sample Measurement	Permit Requirement	Units	Sample Type	Frequency of Analysis	Detection Limits	Analysis Method	Sampling Equipment Used	Samples Filtered (L/F/N)
Water Level Relative to NGVD	82545	5.875	Report	ft	In Situ	Semi-annually		Measurement	Tape Measure	N
Nitrogen, Nitrate, Total (as N)	00620	4.64	Report	mg/L	Grab	Semi-annually	90.00-120.00	TotNit	Bailer	N
Solids, Total Dissolved (TDS)	70295	208	Report	mg/L	Grab	Semi-annually		SM2540 C	Bailer	N
Chloride (as Cl)	00940	22.0	Report	mg/L	Grab	Semi-annually	80.00-120.00	SM4500-Cl E	Bailer	N
Coliform, Fecal	74055	1.00	Report	#/100mL	Grab	Semi-annually		COLILERT-18	Bailer	N
pH	00400	7.0	Report	s.u.	Grab	Semi-annually		Field	Ph meter	N
Turbidity	00070	140	Report	NTU	Grab	Semi-annually	50.00-150.00	EPA180.1	Bailer	N

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)
Jeffrey M Tuttle Operator		772-201-3706	07/13/2021

COMMENTS AND EXPLANATION (Reference all attachments here):

TKCB, Inc.
Response to Staff's First Data Request
Docket No. 20210120-SU

EXHIBIT 3

Flowers Chemical Laboratories, Inc.
Solids Sample follows



FLOWERS CHEMICAL LABORATORIES INC.

P.O. Box 150597, Altamonte Springs, FL 32715-0597
571 NW Mercantile Pl, Suite 111, Port St. Lucie, FL 34986
812 SW Harvey Green Dr, Madison, FL 32340
3980 Overseas Hwy, Suite 103, Marathon, FL 33050

Phone: 407-339-5984 E83018 (Main Lab)
Phone: 772-343-8006 E86562 (South Lab)
Phone: 850-973-6878 E82405 (North Lab)
Phone: 305-743-8598 E35834 (Keys Lab)

Accurate Utilities
5475 NW St. James Dr. #142
Port St. Lucie, FL 34983

PO #: n/a
Client Project #: Sunlake Estates
Date Sampled: Jun 10, 2021
Jun 15, 2021; Invoice: 473515

Report Summary

Date Received: Jun 11, 2021

FCL Project Manager: William J. Rogers

Laboratory #	Sample Description	Analysis	Chemist	Location	Sample Matrix
473515WW1	Aeration	EPA160.4 SM2540 D	CLL DBL	Main Lab Main Lab	Waste Water

Certificate of Results

Sample integrity was certified prior to analysis. Test results meet all requirements of the NELAP Standards except as noted in the Quality Control Report. Uncertainties for these data are available on request. This report may not be reproduced in part; results relate only to items tested.



Jefferson S. Flowers, Ph.D.
President/Technical Director



FLOWERS CHEMICAL LABORATORIES INC.

P.O. Box 150597, Altamonte Springs, FL 32715-0597
571 NW Mercantile Pl, Suite 111, Port St. Lucie, FL 34986
812 SW Harvey Green Dr, Madison, FL 32340
3980 Overseas Hwy, Suite 103, Marathon, FL 33050

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Phone: 772-343-8006 E86562 (South Lab)
Phone: 850-973-6878 E82405 (North Lab)
Phone: 305-743-8598 E35834 (Keys Lab)

Accurate Utilities
5475 NW St. James Dr. #142
Port St. Lucie, FL 34983

PO #: n/a
Client Project #: Sunlake Estates
Date Sampled: Jun 10, 2021
Jun 15, 2021; Invoice: 473515

Quality Report

Quality Control Batch: 10467533

Analyst: DBL

Blank

TSS

Result **Units**
1.00U mg/L

Laboratory Control Sample

TSS

Result **Units** **Spike** **%REC** **%REC Lim**
148 mg/L 150 99.00 80.00-120.00

Duplicate

TSS

Result **Units** **Sample** **RPD** **RPD Lim** **Lab Number**
198 mg/L 188 5.17 20.00 473615WW1

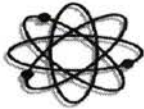
Quality Control Batch: 10467535

Analyst: CLL

Blank

Volatile Suspended Solids

Result **Units**
2.00U %Wt



FLOWERS CHEMICAL LABORATORIES INC.

P.O. Box 150597, Altamonte Springs, FL 32715-0597
571 NW Mercantile Pl, Suite 111, Port St. Lucie, FL 34986
812 SW Harvey Green Dr, Madison, FL 32340
3980 Overseas Hwy, Suite 103, Marathon, FL 33050

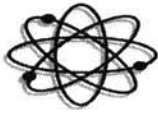
Phone: 407-339-5984 E83018 (Main Lab)
Phone: 772-343-8006 E86562 (South Lab)
Phone: 850-973-6878 E82405 (North Lab)
Phone: 305-743-8598 E35834 (Keys Lab)

Accurate Utilities
5475 NW St. James Dr. #142
Port St. Lucie, FL 34983

PO #: n/a
Client Project #: Sunlake Estates
Date Sampled: Jun 10, 2021
Jun 15, 2021; Invoice: 473515

Analysis Report

Lab #: 473515WW1 Sampled: 06/10/21 08:30 AM Desc: Aeration									
Parameter	Result	Units	DF	MDL	PQL	QC Batch	Method	CAS #	Analyzed
TSS	4530	mg/L	1.00	1.00	2.00	10467533	SM2540 D	E1642818	06/14/21
Volatile Suspended Solids	88.8	%Wt	1.00	2.00	4.00	10467535	EPA160.4		06/12/21



FLOWERS CHEMICAL LABORATORIES INC.

P.O. Box 150597, Altamonte Springs, FL 32715-0597
571 NW Mercantile Pl, Suite 111, Port St. Lucie, FL 34986
812 SW Harvey Green Dr, Madison, FL 32340
3980 Overseas Hwy, Suite 103, Marathon, FL 33050

Phone: 407-339-5984 E83018 (Main Lab)
Phone: 772-343-8006 E86562 (South Lab)
Phone: 850-973-6878 E82405 (North Lab)
Phone: 305-743-8598 E35834 (Keys Lab)

Accurate Utilities
5475 NW St. James Dr. #142
Port St. Lucie, FL 34983

PO #: n/a
Client Project #: Sunlake Estates
Date Sampled: Jun 10, 2021
Jun 15, 2021; Invoice: 473515

Narrative Report

Sample Handling

Sample handling and holding time criteria were met for all samples. Samples collected by submitter. No unusual events occurred during analysis. Results are reported on a wet weight basis for aqueous matrices and on a dry weight basis for sludge and soil matrices unless otherwise noted.

Quality Control

Enclosed analyses met method or FCL criteria, unless otherwise denoted on the sample results. Applied data qualifiers are defined below.

Attachments

Chain of Custody

Qualifier	Meaning
U	Compound was analyzed for but not detected.
J	Estimated value; one or more QC components associated with this data value exceed current QC limits.
Q	Sample held beyond the accepted holding time.
L	Off-scale high; reported concentration exceeds the highest standard.
V	Analyte was detected in both the sample and the associated method blank.
W	The dissolved oxygen blank was above 0.2 mg/L but less than the MDL.
Z	Too numerous to count colonies on plate.
A	Absent
P	Present
T	Value reported is less than the statistical method detection limit. Reported for informational purposes only.
M	Value reported is greater than the statistical method detection limit, but less than the reported MDL.
G	The greatest of the dilutions performed did not yield sufficient oxygen depletion for valid data.
S	The least of the dilutions performed did not yield sufficient oxygen residual for valid data.
O	Result is greater than (over) the specified value.
I	Reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
B	Results based upon colony plate count outside ideal range.
Y	The laboratory analysis was from an improperly preserved sample. The data may not be accurate.

TKCB, Inc.
Response to Staff's First Data Request
Docket No. 20210120-SU

EXHIBIT 4

Inducon Corporation

Invoice No. 21690, follows

INDUCON CORPORATION

P. O. Box 358286
Gainesville, Florida 32635
(352) 377-4148 Fax 377-7591 www.inducon.com
Mark E. Bennett, President
Christopher C. NeSmith, Secretary/Treasurer

Invoice No. **21690**

Date: **January 1, 2020**

SOLD TO:

Mr. Thad Terry
President for TKCB, Inc.
Cocoa, FL

SHIP TO:

Sunlake Estates WWTP
Emerald Lake Drive
Cocoa, FL

18601

Customer Order No. **Signed Quote** Shipped Via: **Crew** Date Shipped: **See below**

Perform urethane injection on 3 structures at WWTP to stop leaks. As described in our quote of 3/6/2017.

12/09/19 - 8 hrs.
12/16/19 - 8 hrs.
12/30/19 - 4 hrs.
20 hrs. @ \$175/hr. = \$3500.00

5 gallons Prime Resins 900XLV @ \$100/gal. = \$ 500.00
\$4000.00

Total Due - \$4,000.00

EXHIBIT 5



Item No. 2 of Deferred Maintenance Request
Compressed air distribution lines have multiple temporary repairs
that need to be repaired/replaced.



Item Nos. 4 & 5 of Deferred Maintenance Request
The RAS/WAS collection box lines need replacement to support the RAS lines.
(3 each 3" angle iron horizontal supports like the one pictured above)
(3" angle iron vertical supports for the RAS/WAS collection box)



Item No. 6 of Deferred Maintenance Request
The force main connecting to the WWTP from the master lift station
needs repaired/replaced and sealed to prevent accidental discharge.

EXHIBIT 6

Accurate Utilities, Inc.

Invoice No. 5636, follows

OCBOA Consulting, LLC

Invoice Nos. 21.002 & 21.004, follow

Accurate Utilities Inc.
 5475 NW St. James Drive #142
 Port St. Lucie FL 34983

772.216.4277
 david@accurateutilitiesinc.net
 www.accurateutilitiesinc.net

Invoice

DATE	INVOICE #
7/21/2021	5636

CUSTOMER BILLING ADDRESS
<p>Atlantis Investment, Inc 5600 North US HWY 1 COCOA, FL. 32927</p>

CLIENT ADDRESS
<p>Sunlake Estates WWTP 613 Emerald Lake drive Sharpes, FL 32927</p>

PLANT	TERMS	DUE DATE
WWTP	Net 15	8/5/2021

DESCRIPTION	QTY	RATE	SERVICED	AMOUNT
<p>Principal David Whiteside to provide consulting for client rate study evaluation.</p> <p>Time spent is an accumulation of documents, conversation, gather of information meeting onsite, during this rate study process. Current QTY is 3 hr as of to date. Any more request of consulting will be in addition to this invoice.</p>	3	105.00	7/21/2021	315.00

Thank you for your business.	Payments/Credits	\$0.00
	Balance Due	\$315.00



OCBOA CONSULTING, LLC

P.O. Box 424
 Goldenrod, FL 32733-0424
 (407) 377-5400

INVOICE: 21.022
DATE: 06/30/21
PAGE: 1 of 1

BILL TO:	FOR:
TKCB Inc. 5600 North Cocoa Blvd. Cocoa, FL 32927 Attention: Thad Terry	Services Provided Project/P.O. #: Agreement for Services

WORK PERFORMED	HOURS	RATE	AMOUNT
Meeting with TKCB to discuss LARI filing. (6/7/21)	1.00	\$95.00	\$95.00
Prepare LARI filing.	6.00	\$95.00	\$570.00
Meeting with TKCB with LARI filing for signatures. Mailed LARI filing to FPSC. (6/22/21)	0.50	\$95.00	NC
OTHER CHARGES	UNITS	RATE	
Travel to TKCB for meeting. (6/07/21)	75 miles	\$0.56	\$42.00
Travel to TKCB for meeting. (6/22/21)	75miles	\$0.56	NC
Postage for LARI filing. (6/22/21)	1	\$8.10	\$8.10
TOTAL INVOICE FOR THE PERIOD			\$715.10
Adjustments:			
Prior unbilled work performed per terms of agreement	1.12	\$95.00	\$106.40
Deferred/Unbilled LARI hours	(7.00)	\$95.00	(\$665.00)
Summary Balance to date per Agreement for Services			
0.00	Remaining unbilled hours		
7.00	Unbilled LARI hours		
TOTAL ADJUSTED AMOUNT DUE			\$164.60

Please make all checks payable to **OCBOA Consulting, LLC**
THANK YOU FOR YOUR BUSINESS



OCBOA CONSULTING, LLC

P.O. Box 424
 Goldenrod, FL 32733-0424
 (407) 377-5400

INVOICE: 21.024
DATE: 07/31/21
PAGE: 1 of 1

BILL TO:	FOR:
-----------------	-------------

TKCB Inc.
 5600 North Cocoa Blvd.
 Cocoa, FL 32927
 Attention: Thad Terry

Services Provided

Project/P.O. #: Agreement for Services

WORK PERFORMED	HOURS	RATE	AMOUNT
Obtain information and prepared response to Staff's First Data Request for the LARI filing. (Filed electronic response to Commission Clerk on 7/29/21)	6.00	\$95.00	\$570.00
Meet with TKCB plant operators at WWTP to obtain additional information on operations and to coordinate response to staff's data request for LARI filing. (7/26/21)	1.00	\$95.00	\$95.00
OTHER CHARGES	UNITS	RATE	
Travel to TKCB WWTP to meet with plant operator. (7/26/21)	84 miles	\$0.56	\$47.04
TOTAL INVOICE FOR THE PERIOD			\$712.04
Adjustments: Deferred LARI hours	(7.00)	\$95.00	(\$665.00)
Summary Balance to date per Agreement for Services			
0.00 Remaining unbilled hours			
14.00 Unbilled LARI hours			
TOTAL ADJUSTED AMOUNT DUE			\$47.04

Please make all checks payable to **OCBOA Consulting, LLC**
THANK YOU FOR YOUR BUSINESS